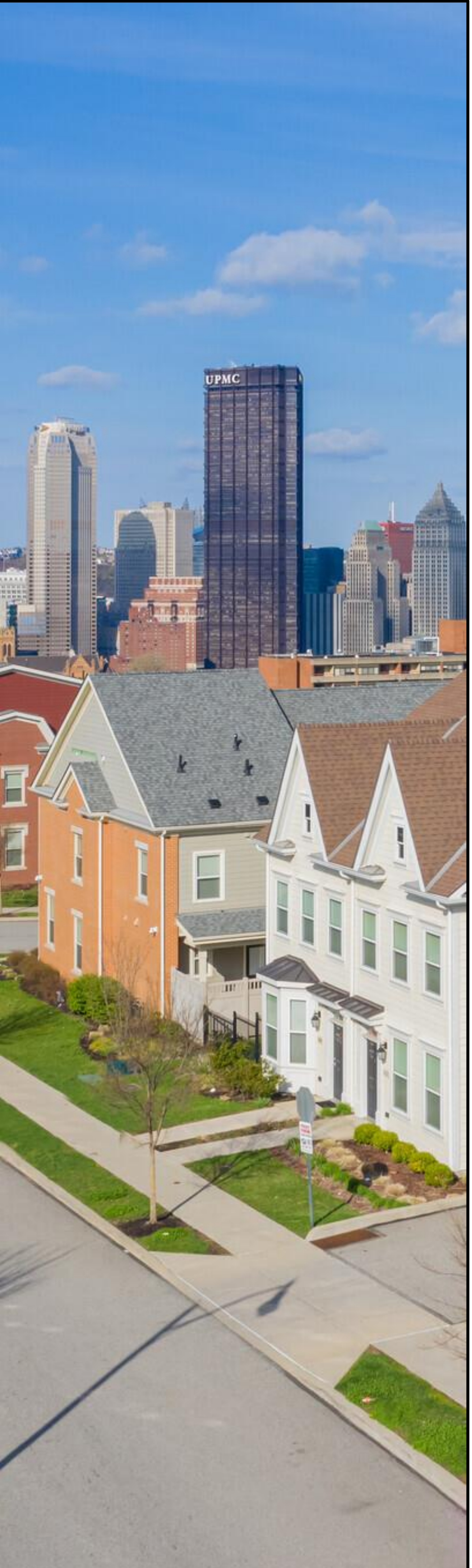

Office of the City
Controller
Rachael Heisler

Special Report:

Housing Authority of the City of Pittsburgh

Activities Under the Moving to Work Demonstration

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May 2025

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Report Highlights

Executive Summary

In recent decades, rising housing costs have emerged as a driving threat to working- and middle-class financial stability, contributing to the displacement of low-income households, a historic rise in homelessness, and stark racial wealth disparities. Though initially isolated to major American metropolitan centers, affordable housing shortages have spread across virtually every region including mid-sized cities like Pittsburgh. Available research points to a growing trend of low-income households leaving Pittsburgh for more affordable housing suburbs while racial disparities in homeownership continue to lag far behind state and national rates.

Historically, two federal programs have served as America's housing safety net to protect the most vulnerable against shortages and discrimination in the private sector: Section 8 (voucher subsidy programs) and Section 9 (the public housing program) of the Housing Act of 1937. Section 9 public housing developments are owned and operated by public housing agencies (PHAs), which select tenants based on a variety of criteria including income, family size, age, and disability. Section 8 has evolved over time and initially only offered project-based subsidies, which are granted to property owners or developers to ensure specific units remained affordable. In 1974, the Housing Choice Voucher Program was introduced, an approach that tied subsidies to prospective tenants instead. Even after being selected to receive a voucher, the recipient must still find a landlord in the private market willing to accept it within a set timeframe and secure a contract that governs the terms of assistance.

Though Section 8 is advantageous to public housing agencies in some respects (reducing the administrative and fiscal burdens of property ownership) and for tenants as well (greater choice and mobility), it also carries risks. Its success relies on adequate participation by private and nonprofit partners, which can be adversely affected by discrimination against voucher holders, program mismanagement, and/or underfunding. Since the 1980s, limits on federal housing investments, the demolition of deteriorating public developments through the HOPE VI program, and a new national strategy of "repositioning" public housing assets toward private ownership have constrained the reach of all programs, resulting in long waitlists while private market supply has simultaneously slowed.

This resource-limited environment has forced public housing agencies like the Housing Authority of the City of Pittsburgh (HACP) to find new means of preserving affordable units with greater reliance on private developer partnerships. This often involves strategies that convert Section 9 public housing units into Section 8 units. As noted above, Section 8 units accept either Housing Choice Vouchers (HCV, a portable tenant-based subsidy) or project-based vouchers (PBV, a subsidy that remains tied to a single unit within a development).

In 2000, the HACP made an important strategic decision by becoming one of the first public housing agencies in the country to join the Department of Housing and Urban Development's (HUD) Moving to Work (MTW) Demonstration. Explored in depth throughout this report, the MTW Demonstration gives the HACP the flexibility to combine three main funding streams from "traditional" HUD programs: the Public Housing Operating Fund, Public Housing Capital Fund, and Housing Choice Voucher Program. It then allows local housing authorities to use this "single fund" in "innovative, locally designed strategies that use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families." Exempt from many of the rules guiding those programs, the HACP can establish its own "local, nontraditional" (LNT) activities with HUD approval. Critically, all MTWdesignated agencies must comply with five statutory requirements meant to ensure locally designed programs do not stray too far from their mix and balance of low-income households at the time of their entry in the Demonstration.

Using its flexibilities as a MTW agency, the HACP established a nonprofit component (Allies and Ross Management Development Corporation, or ARMDC) as part of a robust development program that relies heavily on Section 8 PBV expansion. Though the increase in PBV units has been substantial, it has not been enough to make up for net losses in Section 9 public housing units or stagnant enrollment numbers in the Housing Choice Voucher Program.

A key concern among local housing advocates is the difficulty they have tracking federal funds once transferred to ARMDC. For the MTW program to succeed, all stakeholders – including current tenants, housing providers, and City Council – must be able to clearly understand why a certain investment strategy was taken and how its cost-effectiveness compares against alternatives.

Option 1 in this report aims to resolve this information asymmetry with regular public reports to City Council focused on key program success metrics, as well as disclosing the HACP's external audits. These reports, tailored to local Pittsburgh values and needs, could serve as a baseline from which to measure progress throughout future discussions, enabling Council members to collaboratively understand and address issues in their districts. While the HACP is covered by Department of Housing and Urban Development reporting requirements, our researchers' experience with those materials (including its MTW Annual Reports) found its data insufficiently clear or itemized.

For example, the presentation of data (household demographics, actual/planned units, development program budgets) have changed over time and become less clear in recent reports, while transfers of funds under MTW authority remain exceedingly difficult for the average reader to track. This option requests that HACP voluntarily pursue locally focused reports to further solidify its commitments to transparency and community collaboration. Similarly, **Option 2** requests that the HACP return to clear and consistent reporting of household demographics under each program so stakeholders can monitor progress toward equity goals.

Independent studies on MTW agencies' effectiveness have shown mixed results and the body of research notes wide variations in the scope of local programs approved. A 2018 report by the Government Accountability Office also highlighted those variations, noting that HUD is limited in its ability to evaluate the many MTW programs in existence on an individual basis. While the Demonstration was initially limited to 39 localities, a 2016 law significantly expanded entry and now includes 138 in total, each with their own array of LNT activities. Ultimately, the design of the Demonstration itself is less predictive of performance than what participating agencies decide to do with its added flexibilities. In the absence of more rigorous federal oversight, local collaboration and transparency become critical for ensuring housing production meets community needs.

The City Controller's Office compiled this report, in part, to promote those values and provide local stakeholders with baseline information about the Authority, and as part of a commitment to investigate the rising cost of housing in Pittsburgh. Though the Housing Authority denied initial requests to provide information to the City Controller on the basis of jurisdiction, certain materials (including external audits and data either unclear or missing in the HACP's annual MTW reports) were collected through Right-to-Know requests from the period of October 2023 through March 2024. Without direct cooperation from the HACP, our researchers were unable to directly verify all components of this report. More recent or accurate data may be available through the HACP.

This report was also prompted by local reports of missed payments to housing providers and general inaccessibility in the Authority's Housing Choice Voucher Program, which worsened throughout the pandemic. Since that time, and with public collaboration with City Council, the HACP has made progress in its service performance with tenants and housing providers, a step toward closer local partnership we commend and hope to see strengthened. As stated, federal housing funds are extremely limited, a problem unlikely to change in the foreseeable future. In this environment, efficient management and strong public oversight are key to maximizing the reach of existing dollars. **Option 3** recommends that the HACP collectively engage these tenant and housing provider stakeholders with surveys and incorporate recurring suggestions into its long-term redevelopment strategy.

We also celebrate the improvements made by the Housing Authority over the past year, including its leadership's willingness to discuss problems in an open forum. Still, as its executive team has stated, more progress is needed. City leaders and residents have a vested interest in the HACP's success, both in the annual fiscal investment made with city taxpayer dollars to stabilize an increasingly unaffordable housing market and in our need for broad-based population growth. A resilient housing safety net is the first stop against economic displacement and the threat of homelessness, and we hope this report is a constructive public resource toward those ends.

Options for Policymakers

Option 1: Regular Reports to City Council

In a commitment to greater community transparency, the HACP should submit quarterly reports to City Council. These reports should go in further detail than what is already available in the HACP's MTW Annual Reports, including data points that clearly show yearly progress across activities. In all cases, the most recently available data should be submitted.

1. Financial Transparency
   - Public disclosure of the Authority's annual single audits
   - Baseline capacity: how many households could have been served using only funds from HUD's traditional programs
   - Development program transparency: clearly demonstrate how much was allocated from the HACP's "single fund" block grant authority into each development or fiscal investment
2. Success Measurements
   - Total number of families housed in affordable units, by program
   - Aggregated voucher lease-up and utilization rates
   - Most recent HUD assessments for compliance with the Moving to Work Demonstration's five statutory requirements
3. Equity Measurements
   - Property inspection scores, by council district or neighborhood
   - Per-district/neighborhood totals of where existing voucher holders live
   - Average rent paid by voucher-holding tenants, per district/neighborhood

Option 2: Full Disclosure of Demographic Data for Program Beneficiaries

The HACP should identify and make publicly available the equality and equity outcomes of its activities. At a minimum, the HACP should return to the full disclosure of household demographics by program (including race, immigration status, disability status, income level, and family- or senior-based household status). This should encompass all traditional and nontraditional activities resulting in housing for residents, including PBVs and alternative units.

Option 3: Survey and Engage HACP Stakeholders

In an effort to quantify the most common issues faced by its stakeholders, the HACP should conduct community-wide surveys and release the results to the public. These surveys should be tailored to address specific stakeholder groups (e.g., public housing resident, voucher holder, waitlist applicant, housing provider/landlord) and could measure their satisfaction with the HACP's various services, current redevelopment strategy, and gauge interest in tenant councils at each property. The results should be used to guide decisions in a way that is consistent with community needs and desires.

Glossary of Housing Acronyms and Programs

Federal Agencies and Programs

Choice Neighborhoods Implementation Grant (CNI Grant) - Federal grant for the Choice Neighborhoods program launched in 2010. This program takes a holistic approach to public housing redevelopment by requiring community involvement and making infrastructure and quality of life improvements to surrounding neighborhoods. Choice is highly competitive due to its limited annual funding.

HOPE VI – HUD program launched in 1992 that gave grants to public housing agencies to demolish severely distressed public housing developments. While successful in that goal (demolishing around 100,000 public housing units through 2010), it was criticized for weak tenant protections and not requiring one-for-one replacement of demolished units. The Choice Neighborhoods program and Rental Assistance Demonstration (RAD) were launched in 2010 to replace HOPE VI and address its inadequacies.

Moving to Work (MTW) Demonstration – HUD program created by Congress in 1996. Selected PHAs (often referred to as "MTW agencies") are granted "single fund flexibility." This allows them to combine three main funding streams (Public Housing Operating, Public Housing Capital, and Housing Choice Voucher) and invest them in locally designed programs meant to "use Federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families." As of this report, there are 138 PHAs participating in the MTW Demonstration nationwide.

- **Family Self-Sufficiency (FSS)** – HUD program launched in 1990 and administered by PHAS to "enable HUD-assisted families to increase their earned income and reduce their dependency on welfare assistance and rental subsidies." The HACP incentivizes participation in its FSS program through its Modified Rent Policy, a local nontraditional activity that sets a minimum monthly rent of $150 for most Section 8 and 9 households unless working or participating in FSS activities.
- **Local Nontraditional Activity (LNT)** - Locally designed program an MTW agency has created with HUD approval that otherwise would not be permitted to use Section 8 and Section 9 funds.
- **"Substantially the Same" (STS) Requirement** – One of five requirements under the Moving to Work Demonstration. HUD requires that MTW agencies assist substantially the same total number of eligible low-income households as would have been served without the Demonstration. Compliance is assessed with a baseline number of households that must be served each year.

Rental Assistance Demonstration (RAD) - HUD program launched in 2011 that allows PHAs to convert Section 9 public housing units into Section 8 project-based units including PBVs. Absent federal funding to address the growing backlog of capital needs in aging public housing developments, RAD provides a powerful alternative option to modernize or redevelop them. By converting these units to Section 8 status, PHAs unlock access to wider array of financing sources including private capital and tax credits like the LIHTC. Resulting RAD contracts typically ensure unit affordability for 15-20 years with an option to renew, while tenants in impacted units are protected throughout the conversion process. Converted units usually remain under the ownership of the PHA or its subsidiary but are sometimes transferred to a nonprofit housing provider. The current cap set by Congress on public housing RAD conversions is 455,000 units nationwide.

Section 8 of the U.S. Housing Act – Rental assistance programs that primarily come in two forms: tenant-based or project-based, both of which generally cap the tenant's rent and utilities contribution at 30% of their monthly income. The main difference is in their *portability*. Under tenant-based programs, the subsidy is tied to the prospective tenant and remains with them if they decide to move. Project-based assistance is non-portable, since the property owner or developer receives the subsidy to keep specific units affordable. Tenants for these units are also selected through a waitlist and screening process but lose the subsidy when they move.

- **Housing Assistance Payment Contract ("HAP Contract")** - Formal agreement between a PHA and landlord that determines how much of a Section 8 unit's rent the PHA will subsidize without the tenant incurring costs beyond 30% of monthly income. For the HACP's Housing Choice Voucher Program, local payment standards determine the maximum subsidy based on the unit's location and corresponding Small Area Fair Market Rents (SAFMRs).
- **Housing Choice Voucher Program (HCV/HCVP)** - Tenant-based assistance program and the single largest housing program in the U.S. both by annual spending and total households assisted. A qualifying individual or family must find a unit meeting program standards and a landlord willing to accept the voucher within a set timeframe. At that point, a HAP Contract is signed between the tenant, landlord/housing provider, and PHA governing terms of assistance and each party's responsibilities.
- **Project-Based Voucher (PBV)** - Project-based rental assistance in which a private or nonprofit property owner is contracted with a PHA to keep specific units affordable. Though initially a small component of the larger Housing Choice Voucher Program, the number of PBVs have grown rapidly since the creation of the Rental Assistance Demonstration (RAD) in 2011.

Section 9 of the U.S. Housing Act ("Public Housing") - Federal program providing publicly owned affordable housing to low-income families, seniors, and people with disabilities. PHAs receive funding for the maintenance and improvement of these developments from two sources, the Public Housing Operating and Capital Funds. This program is sometimes referred to as the Low-Income Public Housing (**LIPH**) program. Public housing developments are directly owned and managed by the local PHA.

Low-Income Housing Tax Credit (LIHTC) - Administered by the IRS at the federal level and housing finance agencies at the state level (e.g., the Pennsylvania Housing Finance Agency or PHFA). The program's tax credits are awarded to developers to subsidize the construction or rehabilitation of affordable housing units. LIHTCs are one of many financing sources leveraged by PHAs in their affordable housing strategies.

Uniform Physical Condition Standards (UPCS)/National Standards for the Physical Inspection of Real Estate (NSPIRE) – Inspection protocols required by HUD to evaluate the quality and safety of public housing and HUD-assisted units. NSPIRE is the new protocol replacing UPCS and is in effect for all public housing units as of October 2024 but has been delayed for most other programs including Section 8 vouchers.

U.S. Department of Housing and Urban Development (HUD) - Federal Cabinet-level agency responsible for administering a wide array of programs and protections, most prominently those under Sections 8 and 9 of the U.S. Housing Act of 1937 and the Fair Housing Act of 1968.

Local Agencies and Programs

Allies and Ross Management Development Corporation (ARMDC) - Nonprofit component of the HACP established in 2007 to facilitate mixed finance developments. As a nonprofit, ARMDC is able to receive and administer financing sources the HACP otherwise could not, expanding its available strategies for affordable housing creation.

Housing Authority of the City of Pittsburgh (HACP) - Established by Pittsburgh City Council in 1937 following passage of the U.S. Housing Act "to provide for the elimination of unsafe and unsanitary housing conditions, the eradication of slums, and the provision of decent, safe and sanitary dwellings" for low-income families. The HACP is one of about 3,300 public housing agencies in the U.S.

Project-Based Voucher and Gap Financing Program ("PBV/Gap") - Local nontraditional program established by the HACP under the Moving to Work Demonstration with first investments made in 2015. The HACP, through its nonprofit component ARMDC, subsidizes the creation of affordable units in new developments by pooling funding sources (including federal tax credits) to fill the "gap" needed to make an affordable unit financially viable. Developers are selected through a competitive request for proposals (RFP) process.

Public Housing Agency (PHA) - Local government agencies authorized by state law, approved by local governments, and overseen by HUD. PHAs are the primary end-administrator of HUD programs and funds. Local PHAs include the Housing Authority of the City of Pittsburgh (HACP) and the Allegheny County Housing Authority (ACHA).

Section 1: ‘Moving to Work Demonstration’ Overview and Local Context

The 'Moving to Work' (MTW) demonstration was first authorized by Congress with the passage of the Omnibus Consolidated Rescissions and Appropriations Act of 1996. According to HUD, the MTW Demonstration gives public housing agencies the opportunity “to design and test innovative, locally designed strategies that use federal dollars more efficiently, help residents find employment and become self-sufficient, and increase housing choices for low-income families.”

While the differences between an “MTW agency” and traditional public housing agencies are explored throughout this report, the overall distinction is that MTW agencies may receive HUD approval to engage in “local nontraditional” (LNT) activities otherwise not permitted. For example, an agency in the Demonstration may use funds from traditional sources (primarily the Public Housing and Housing Choice Voucher programs) to invest in development strategies typically reserved for private entities or to design programs with specific populations in mind.

On November 17, 2000, HUD and HACP executed the Moving to Work Agreement, marking the Authority’s formal entrance into the Demonstration. The most recent extension was signed by the HACP on June 8, 2017, extending the HACP’s participation in the demonstration through 2028[1]. The HACP, like all MTW agencies, must comply with five statutory requirements, which are examined in **Section 4** of this report.

Existing Research: Moving to Work Demonstration Performance Nationwide

<u>External Studies</u>

In July 2017, Abt Associates released a report commissioned with local housing agencies to test performance measures of the Moving to Work Demonstration[2]. Their main findings, based on 2015 data:

- **Cost-Effectiveness:** After adjusting for local wage rates, the average per-unit public housing operating costs for MTW agencies was $12/month higher than for non-MTW agencies ($594 compared to $582); administrative costs were about $14 higher ($79 compared to $65).
- **Self Sufficiency:** Earnings were more likely to increase under MTW agencies (46.2% compared to 42.6%), although the average share of households with decreased earnings was also slightly higher (29.9% compared to 27.8%). Fewer had zero earnings (22.6% compared to 26.8%) and the average length of stay at MTW agencies was shorter (7.4 years compared to 8.3 years).
- **Quality and Quantity of Affordable Housing:**

[1] “Second Amendment to Amended and Restated Moving to Work Agreement”, https://www.hud.gov/sites/documents/2028EXTENSIONPITTSBURGH.pdf

[2] Buron et al., “Testing Performance Measures for the MTW Program.” July 25, 2017. https://www.housingcenter.com/wp-content/uploads/2017/09/testing_performance_measures_for_the_mtw_program.pdf

- o <u>Voucher and Public Housing Utilization:</u> MTW agencies had lower utilization rates for Housing Choice Voucher slots (89.3% compared to 90.7%), but virtually the same utilization rates for public housing units. The researchers speculate that voucher utilization may be lower at MTW agencies due to their use of nontraditional MTW vouchers, which are more difficult to track and are often missing in HUD data systems.
- o <u>Use of Nontraditional Assistance</u>: Using their block grant authority, MTW agencies provided property-based housing assistance to a combined 5,455 households and tenant-based assistance to 2,454 households (overall total of 7,909)
- o <u>Physical Inspection Scores for Public Housing:</u> The average inspection score for public housing units in MTW agencies was 83.9 (out of 100), compared to 82.0 for non-MTW agencies.
- o <u>Unmet Capital Needs</u>: The average number of public housing units with unmet capital needs was higher for MTW agencies (2,038 units) than for non-MTW agencies (1,424 units). However, MTW agencies have a statistically significant lower share of all units with unmet needs (76.6%) than for comparison agencies (90.3%)

- **Geographic Scope**: Non-MTW agencies are permitted to project-base up to 20% of their allocated vouchers. Unlike traditional Housing Choice Vouchers, which are portable and move with the tenant, project-based vouchers are tied to units to achieve long-term affordability in a specific location. MTW agencies have the authority to exceed that cap. The average share of project-based vouchers was higher for MTW agencies (8.0% compared to 4.7%), although only four MTW agencies exceeded the 20% threshold.

The Center on Budget and Policy Priorities (CBPP), in their analysis of these results, specifically focused on MTW agencies' use of "nontraditional" assistance:

> "In 2014, MTW agencies provided housing assistance to 8,000 families through 'non-traditional' programs funded with transferred voucher or public housing funds. Considered in isolation, this might suggest that MTW agencies served more families than other agencies. HUD data not included in the report, however, show that MTW agencies provide vouchers to tens of thousands fewer families than they could with the funds they receive. In 2015, MTW agencies left about 68,000 families without vouchers because they shifted approximately $600 million in voucher funds — 19 percent of their total voucher subsidy funding — to other purposes or left the funds unspent. **The net result is that MTW agencies provided housing assistance to close to 60,000 fewer families than they could with the funds they received.**"

The CBPP's researchers highlight an underlying tension in the MTW program: while the program's flexibility has enabled to participating agencies to invest in innovative housing strategies through nontraditional activities, it's unclear to what extent funding those activities has come at the expense of housing families through the traditional programs. The CBPP noted their concerns with this dynamic:

> "HUD data show that in 2015, the most recent year for which complete data are available, MTW agencies received $3.3 billion in voucher subsidy funds. If they had used all of their funds for vouchers, they would have assisted about 350,000 families.
>
> Instead, the HUD data show that they spent just $2.7 billion (81 percent of the total) on voucher subsidies and provided vouchers to 282,000 families — <u>or 68,000 fewer families than they could have assisted</u> — while shifting about $600 million to other purposes or

> leaving the funds unspent... By contrast, non-MTW agencies used nearly all their funds for vouchers subsidies, providing vouchers to 99 percent of the families they could assist with the funds they received."

U.S. Government Accountability Office Findings

Another obstacle to assessing the program's effectiveness has been the limited availability of data. In January 2018, the U.S. Government Accountability Office (GAO) released a report on the Moving the Work Demonstration[3]. Its overall finding was that HUD oversight of the program has been limited, particularly concerning its collection of MTW data:

> *"Due to limited data, HUD cannot fully determine the extent to which demonstration flexibilities affected the performance of MTW agencies, especially in relation to outcomes that affect the number of tenants served — occupancy and voucher utilization rates and program expenses."*
> *– U.S. Government Accountability Office*

The GAO found that MTW agencies on average had lower public housing occupancy rates and voucher utilization despite higher yearly median program expenses as compared to non-MTW agencies. Both variations were statistically significant. The report theorizes this is attributable to nontraditional activities (like gap financing) allowable under MTW funding flexibility. Since HUD data does not differentiate between traditional and non-traditional expenses, a firm conclusion regarding these differentials was not possible. Ultimately, MTW agencies' flexibility represents a trade-off: improved housing quality in new units, but often at the expense of additional households served.

Finally, the GAO noted this about HUD oversight of rent reform, work requirements, and time limits on tenants under the Moving to Work demonstration:

> "**HUD is limited in its ability to evaluate the effect of MTW policies on tenants.** HUD does not have a framework – including clear guidance on reporting requirements and analysis plans – for monitoring the effect of rent reform, work-requirement, and time-limit policies... [HUD guidance] does not describe what must be included in the analyses or policies, leading to wide variation in how agencies develop them. Also, **HUD does not assess the results of agencies' analyses**."

[3] U.S. Government Accountability Office, "Rental Housing: Improvements Needed to better Monitor the Moving to Work Demonstration, Including Effects on Tenants". GAO-18-150, January 25, 2018. https://www.gao.gov/products/gao-18-150

HACP Oversight Challenges

Limits to Local and State Oversight

In 2013, the City Controller's Office released a limited performance audit of the HACP following a request from the Allegheny County District Attorney[4]. That request was prompted by its use of constables for law enforcement under a security contract. The DA also requested more information about two nonprofits the Authority had created: Allies and Ross Management and Development Corporation (ARMDC) and Clean Slate E3.

The audit notes the HACP's lack of cooperation at that time:

> "Controller auditors met with HACP administration in July 2012 to discuss audit scope and objectives. At that meeting, the auditors were told that the Controller, who conducted performance audits of the Authority for over ten years, has no authority to audit the Authority. According to HACP, because the Authority receives no funding from the City, the City has no authority to audit it.
>
> The Authority is subject to annual performance reviews by the federal Housing and Urban Development (HUD) agency from which it gets 99% of its funding. Consequently, HACP would not cooperate with an audit of construction cost overruns but as stated in a letter to the Management Auditor, was 'willing to cooperate with the Controller regarding answering specific questions that stemmed from the District Attorney's request.'"

Since then, HACP leadership has maintained that stance and has directed Controller's Office representatives to file Right to Know requests for information sought.

As discussed in the following section, the State Inspector General declined to investigate a complaint regarding the HACP, citing a lack of investigative authority. The federal GAO report makes clear that HUD does not have the resources to conduct robust, continuous assessments of MTW program results. **The resulting environment is one where the HACP is largely responsible for overseeing the MTW Demonstration's success or failure without thorough evaluation of its nontraditional activities or their cost-effectiveness.**

Ongoing Dysfunction in HACP's Housing Choice Voucher Program

In 2023, a series of local reports began sounding the alarm on internal dysfunction at the HACP, particularly within the Housing Choice Voucher Program. The former administrator of its Homeownership Program filed a complaint with the Pennsylvania Department of State in February, alleging that the HACP "does not adhere to basic business standards, which places vulnerable populations at risk of homelessness."[5] Due to the complexity of the issues presented, including jurisdiction, the Office of the State Inspector General declined to pursue the case.

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[4] Office of the City Controller, "Performance Audit: Housing Authority of the City of Pittsburgh." April 2013. https://www.pittsburghpa.gov/files/assets/city/v/1/controller/documents/performance-audits/pittsburgh_housing_authority_april_2013.pdf

[5] Eric Jankiewicz, "Section 8 sold short: Pittsburgh housing authority's mishandling of vouchers repels landlords, imperils tenants." *PublicSource*, April 5, 2023. https://www.publicsource.org/pittsburgh-housing-authority-section-8-choice-vouchers-tenants-landlords-affordable

The complainant specifically raised issues with HACP's use of its budget flexibility under Moving to Work, saying, "The more the voucher programs fails, the more development they can do and nobody is watching. The money doesn't disappear, it goes into another development."

Weeks later, local housing nonprofit Rising Tide Partners, which works to prevent community displacement, wrote to the HACP's Chief Operating Officer, saying the organization hadn't received payments for many of their voucher holders over the previous two years. In one case, a tenant filled out paperwork requested by the Authority five separate times through three different case workers. Housing developers and advocates have warned that in this environment, fewer landlords are willing to endure these hurdles and are withdrawing from the program altogether.

In May, a former HACP board member who served from 2020 to 2022, stated that their decision to resign from the position was driven by disorganization in the Section 8 program:[2]

> *"The lack of communication. The weeks and months without getting their phone calls and emails answered. The months and years that people are waiting to get their rental payment. That's why we're losing units." – Former HACP board member*

The HACP responded to these criticisms by saying it would use a 10% increase in funding for the Housing Choice Voucher Program to make a variety of improvements, including $1,000 bonuses for new landlords entering the program, adding department capacity, and improving customer service. In October 2023, the board approved a contract of up to $500,000 with Florida-based CVR and Associates to make improvements to the voucher program including to train new staff.[6] In December, they approved a number of other changes to the program, one of which required voucher holders to live in the city for at least one year after receiving a voucher.

On March 11, 2024, the HACP reopened its waiting list for the Housing Choice Voucher program for the first time since 2018, saying the existing waitlist had finally been cleared. Within a day, the Authority received over 3,000 applications. At that rate, it was expected that the HACP could see as many as 19,000 applications through the week, significantly higher than the roughly 10,000 applications it received in 2018 and well above the roughly 5,600 vouchers available for use in 2024. Despite this, local housing providers in the voucher program have repeatedly noted delayed referrals from the waitlist for vacant units and conflicting information from HACP regarding how many eligible tenants are available.[7]

On October 30, 2024, City Council held a post-session meeting for a "discussion on the Section 8 program as it relates to landlords." During the meeting, HACP's executive leadership highlighted the progress made since the contract with CVR and Associates was executed. This included processing most contracts under the 60-day guidelines, reducing inspection times, enhanced payment standards, and a new landlord portal to improve communication. HACP's executive

[6] Kate Giammarise, "Pittsburgh Housing Authority approves $500k contract to improve Section 8 housing voucher program". WESA, October 26, 2023. https://www.wesa.fm/development-transportation/2023-10-26/pittsburgh-section-8-housing
[7] Eric Jankiewicz, "Pittsburgh city leader seeks to sell landlords on Section 8 tenants". *PublicSource*, October 30, 2024. https://www.publicsource.org/pittsburgh-housing-authority-section-8-choice-vouchers-city-council-landlords-affordable-housing

leadership also heavily emphasized project-based vouchers as a key component of their strategy to expand affordable housing options, which is explored further in this report.

One council member noted that he often heard from developers that "they want nothing to do with the voucher program." HACP's executive director noted that this might be changing due to the Authority's adoption of new HUD-approved payment standards. According to their own internal study, the new payment standards are higher than the average market cost 71% of the time, which reduces the cost burden for both the landlord and renter and theoretically improves the program's financial appeal.

The housing providers in attendance, who represented both small-scale and large-scale rental enterprises throughout the city, acknowledged some improvements like a new landlord portal but noted that their most common issues when interacting with the Authority still persist: units sitting vacant while awaiting an inspection from HACP, gaps in communication (e.g., paperwork lost, unclear where an application is in the process), and inconsistent messages regarding the availability of tenants from the waitlist. One landlord representative noted that these are not issues they face when interacting with the Allegheny County Housing Authority. They also noted that high turnover has a negative impact on this process and that the HACP's internal culture is essential to keeping good employees in place.

Acknowledging the severity of the problems faced by the Authority in recent years, the executive director asserted that it was now moving in the right direction and that "morale is high" within the organization.

Single Audit Findings: Housing Choice Voucher Program

During the course of this report, our researchers submitted Right to Know requests with the Housing Authority for any external audits conducted from 2014-2022. The materials provided included the Authority's single audits, which are conducted each year by Maher Duessel.

Contained within those audits are the Independent Auditors' Reports, which provides a summary of any identified deficiencies in internal controls or matters of noncompliance with applicable laws and regulations. These reports stress that while the auditors test for these issues, which provides a "reasonable basis" for their opinions, they do *not* express an opinion on the overall effectiveness of the Authority's internal controls or the extent of its compliance.

In the audits for 2014 through 2016, no material weaknesses or instances of noncompliance were found. Yet beginning with the 2017 report, the auditors' findings repeatedly note a **"lack of consistent internal controls",** escalating in severity from "significant deficiencies" in the 2017 audit to "material weaknesses" by the 2021 and 2022 audits.

Recurring errors often involved the Public Housing and Housing Choice Voucher programs: missing key deadlines, failing to conduct inspections or re-inspections in a timely manner, incomplete documentation in tenant files, and failing to make abatements to tenants when deficiencies are left uncorrected.

A full list of their findings and accompanying notes can be found in **Table 1** below.

Table 1

HACP Single Audit Findings (2017-2022)	
Year/Finding	**Description**
2017-001	Review of 60 HUD-50058 submissions: seven were not completed within the required 60 days. Of those seven, one was related to Public Housing program and six were related to Housing Choice Voucher program.
2018-001	Significant adjustments were made to the Financial Data Schedules (FDS) and financial statements with regard to mixed financing related transactions.
2018-002	Review of 60 HUD-50058 submissions: ten were not completed within the required 60 days. Of those ten, one was related to Public Housing program and nine were related to the Housing Choice Voucher program.
2019-001	Review of 60 HUD-50058 submissions: 11 were not completed within the required 60 days. Of those 11, three were related to the Public Housing program and eight were related to the Housing Choice Voucher program.
2019-002	Review of 30 HCV tenant files: three did not have annual inspections performed in a timely manner. In one case where the inspection was performed by failed, the reinspection was not performed within 30 days of the failed inspection.
2020-001	Review of 60 HUD-50058 submissions: seven required corrections subsequent to the original form being processed. Of those seven, one was related to the Public Housing program and six were related to the Housing Choice Voucher program.
2020-002	Review of 60 HUD-50058 submissions: five were not completed within the required 60 days. Of those, one was related to the Public Housing program and four were related to the Housing Choice Voucher program.
2020-003	Review of 30 HCV tenant files: in 12 files, annual inspections were not performed within a one-year timeframe as outlined in HACP's MTW Annual Plan.
2021-001	**Material weakness identified.** Review of 60 HUD-50058 submissions: 12 required corrections or required documentation to support the income calculation due to a lack of functioning internal controls.
2022-001	**Material weakness identified.** Noted lack of functioning internal controls. Review of 60 tenant files: in two cases, the tenant files were unable to be provided; in four cases, recertifications were not completed on a timely basis. With regard to tenant recertification, found two instances where the application was missing or unsigned, three where a social security card or driver's license was missing, two where the signed HUD Form 9886 was missing, two where a signed lease agreement was missing, and two where a signed HAP contract was missing.
2022-002	**Material weakness identified.** Review of 40 failed inspection reports: in two cases, rent (or partial month's rent) was not abated when the deficiencies found were not corrected within the required time frame and 29 instances where they were unable to identify the exact date the landlord was notified about the deficiencies.

Source: Maher Duessel Single Audits of HACP

Combined, these findings illustrate that HACP issues with internal controls and/or staff training were building in the years before the pandemic.

Our researchers also spoke with a former HACP employee referred to the Controller's Office who independently corroborated the issues raised in these audits, including high levels of staff turnover and a lack of adequate training for new hires.

Maher Duessel Single Audit of HACP (2022):

"The Authority did not comply with requirements regarding Eligibility, Reporting, and Special Tests and Provisions… this could lead to ineligible tenants being housed through the Authority program, and/or overpayments or underpayments of rental assistance, and incorrect information being reported to HUD."

In the 2021 audit, Maher Duessel auditors provided a Qualified Opinion on the Moving the Work Demonstration Program. While noting that their audit "does not provide a legal determination of the Authority's compliance with the [MTW program's] compliance requirements", they found that "the Authority did not comply with the requirements regarding Reporting as described in finding 2021-001 for the Moving to Work Demonstration Program, ALN#14.881. **Compliance with such requirements, is necessary, in our opinion, for the Authority to comply with the requirements applicable to that program."**

In that same report, the auditors found a material weakness in finding 2021-001, defined as "a deficiency, or a combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a... federal program will not be prevented, or detected and corrected, on a timely basis."

Again, in 2022, the auditors found the same material weakness, stating that **"The Authority did not comply with requirements regarding Eligibility, Reporting, and Special Tests and Provisions"** as it relates to the Moving to Work Demonstration Program. Due to the lack of adequate internal controls and appropriate documentation found in tenant files, the auditors warned that "this could lead to ineligible tenants being housed through the Authority program, and/or overpayments or underpayments of rental assistance, and **incorrect information being reported to HUD**."

With every finding listed, employee turnover was cited as the driving cause. While this became a widespread phenomenon in the public sector in the aftermath of the pandemic, many of the auditors' findings predate that period.

Through a Right to Know request, our researchers also requested payroll records for 2018-2023 showing:

a. The total number of people employed by the HACP each year,
b. The total number of HACP employees terminated each year, and
c. The total number of people employed as Section 8 Specialists.

While HACP representatives did not provide verifiable payroll records, they did provide the totals found in **Table 2** below (Turnover Rate column added):

Table 2

HACP Self-Reported Turnover Rate (2018-2023)				
Year	**Employees**	**Terminations**	**Turnover Rate**	**Housing Specialists**
2018	385	64	16.6%	19
2019	392	98	25.0%	13
2020	353	61	17.3%	10
2021	353	70	19.8%	12
2022	384	85	22.1%	17
2023 (YTD)	389	76	19.5%	22

Source: HACP Right-to-Know Request

These self-reported figures show that the HACP was grappling with high levels of turnover in at least the two years preceding the outbreak of COVID-19 in 2020 and its subsequent labor disruptions. In fact, turnover peaked in 2019 when terminations represented a full quarter of the Authority's employees.

By affording public housing agencies considerable flexibility in their funding decisions, the Moving to Work Demonstration has great potential to expand housing choice and affordability. Yet given HUD's relatively light oversight over outcomes, it's critical that this amount of discretion is accompanied by strong local oversight and transparency with communities served.

In the HACP's public meetings with City Council throughout 2024, both sides committed to semi-regular discussions for the foreseeable future. A positive sign of local intergovernmental cooperation, these meetings could further be strengthened by establishing a handful of measurable data points that would serve as a baseline to assess whether the Authority is making progress or falling behind. This would have the benefit of familiarizing council members with key housing indicators and building their overall understanding of HACP's complex components to address emerging problems proactively.

This would not be the first time City Council has adopted a role in the oversight of federally assisted housing. In 2017, the Code of Ordinances was amended to add Chapter 1005 – Federally Assisted Multifamily Properties. The ordinance was passed in response to failed inspection scores of multiple properties in Garfield, Homewood, and Larimer, and it requires the Director of Permits, Licenses, and Inspections (PLI) to "semi-annually" request that the local HUD Field Office Director submit a report of all properties with inspection scores below 70 to the Mayor, Council, and PLI. Regular reports by the HACP to Council could supplement these efforts.

Consistent public reports to City Council, ideally on a quarterly or semi-annual basis, would strengthen this existing relationship, increase community transparency, and welcome constructive accountability – all of which are vital to good governance.

Option 1: Regular Reports to City Council

In a commitment to greater community transparency, the HACP should submit quarterly reports to City Council. These reports should go in further detail than what is already available in the HACP's MTW Annual Reports, including data points that clearly show yearly progress across activities. In all cases, the most recently available data should be submitted.

1. Financial Transparency
   - Public disclosure of the Authority's annual single audits
   - Baseline capacity: how many households could have been served using only funds from HUD's traditional programs
   - Development program transparency: clearly demonstrate how much was allocated from the HACP's "single fund" block grant authority into each development or fiscal investment

2. Success Measurements
   - Total number of families housed in affordable units, by program
   - Aggregated voucher lease-up and utilization rates
   - Most recent HUD assessments for compliance with the Moving to Work Demonstration's five statutory requirements

3. Equity Measurements
   - Property inspection scores, by council district or neighborhood
   - Per-district/neighborhood totals of where existing voucher holders live
   - Average rent paid by voucher-holding tenants, per district/neighborhood

Section 1: Key Takeaways

1. External studies have found mixed results regarding the Moving to Work Demonstration's benefits. The budget flexibility granted to local housing agencies appears to help clear the backlog of capital needs for public housing developments, but spending on "nontraditional activities" may result in fewer families assisted through traditional programs (i.e., the Public Housing and Housing Choice Voucher programs).

2. The HACP has asserted that the City Controller lacks jurisdiction to conduct the Authority and the State Inspector General has declined to investigate complaints based on similar grounds. This leaves HUD as the sole entity capable of conducting rigorous oversight.

3. A report by the US Government Accountability Office found that HUD lacked the resources and data needed to evaluate whether MTW agencies' nontraditional activities are succeeding or failing. While HUD conducts oversight and data tracking to some extent, it relies heavily on MTW agencies' own analyses and self-reporting.

4. In recent years, numerous complaints and reports from local media have revealed extensive dysfunction within the HACP's Housing Choice Voucher Program. Based on findings obtained from independent audits of the HACP, these problems seemed to stem from high staff turnover and a lack of adequate training for new hires. Over time, this resulted in a weakening of internal controls, improper documentation, and mistakes left uncorrected.

Section 2: Pittsburgh Housing Needs and Racial Disparities

City of Pittsburgh Housing Needs Assessments

The City of Pittsburgh's 2022 Housing Needs Assessment showed stark housing inequalities between its low-income and high-income residents.[8] Between 2016 and 2019, the city added around 5,200 new households, but this was largely driven by those with significantly higher incomes and levels of educational attainment.

Simultaneously, the number of renters under 30% of area median income (AMI) fell by over 3,000 between 2015 and 2019. This follows a finding from the 2016 assessment estimating a citywide deficit of nearly 15,000 units affordable to households at or below 30% AMI. By 2019, that deficit was estimated to be approximately 8,200 units, driven primarily by the decrease in low-income residents.

The report estimated that about 2 in 5 renters citywide were cost burdened, meaning they spend over 30% of their monthly household income on rent and utilities. Households making less than $35,000 represented 82% of all severely cost-burdened households; 7 in 10 households from this group were burdened overall.

Between 2015 and 2019, Pittsburgh lost around 350 Black renter households and 700 Black owner households – the only racial or ethnic group to experience a significant decline in either category (**Figure 2**). The loss in homeowners is especially concerning: their decline outpaced even renters, who are more vulnerable to rising rents in the private market. This also stands in clear contrast to the rise in homeownership among most other racial groups.

Figure 1

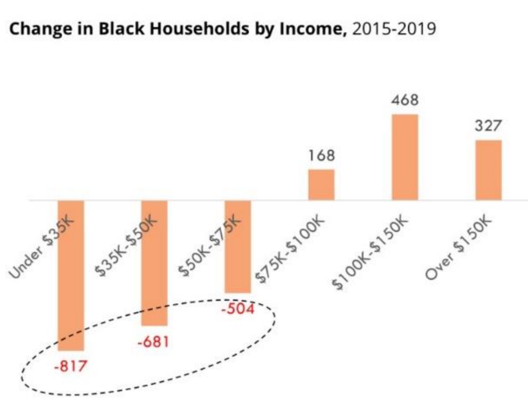
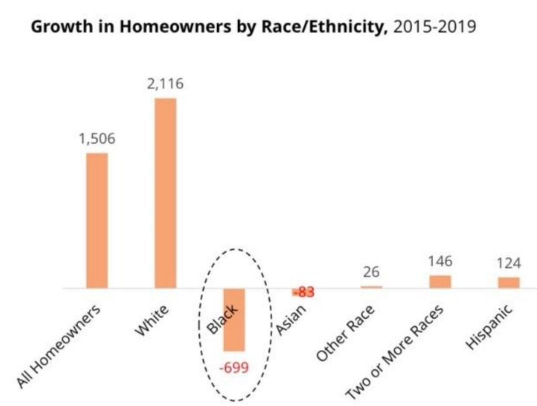


Figure 2



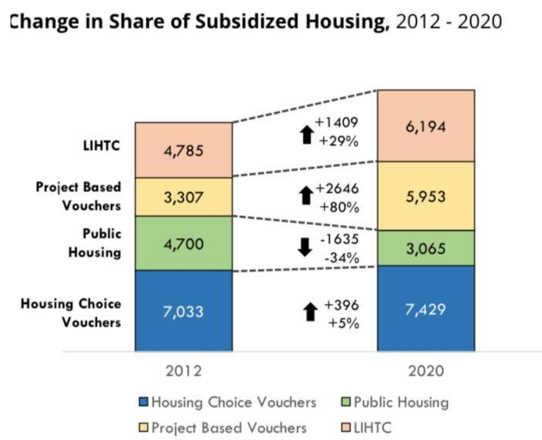
Source: City of Pittsburgh 2022 Housing Needs Assessment

[8] City of Pittsburgh, "Pittsburgh Housing Needs Assessment Final Report." January 2022. https://apps.pittsburghpa.gov/redtail/images/21887_Pittsburgh_HNA_Final_Report.pdf

Conflicting Data with HACP Self-Reporting

From there, the report estimates that the number of subsidized housing units increased by 14% between 2012 and 2020, from 19,825 to 22,641, a net gain of 2,816 units (**Figure 3**).

Figure 3



Source: City of Pittsburgh Housing Needs Assessment (2022)

According to the Housing Needs Assessment, there were 7,033 Housing Choice Vouchers in 2012 and 7,429 in 2020. Yet the HACP's own Annual Reports show that there were 5,430 vouchers utilized in 2012 and 5,516 utilized in 2020. Similarly, the Assessment estimates there were 4,700 public housing units in 2012 and 3,065 in 2020, compared to the HACP's reporting of 3,967 and 2,837 units respectively.

The report also estimates that 2,646 Project-Based Vouchers (PBVs) were added to the inventory, rising from 3,307 in 2012 to 5,953 in 2020. This is far greater than what has been self-reported by the HACP.

HACP's MTW Annual Reports list 18 PBV units actually leased to tenants at the end of 2012, rising to 110 the following year and 666 by the end of 2020. This is corroborated by page 83 in the 2024 MTW Annual Report: "The HACP has managed every aspect of the PBV program for **nearly a thousand PBV units** developed and owned privately since 2011." Additionally, in the appendix for HUD's 2021 report *Moving to Work Agencies' Use of Project-Based Voucher Assistance*, the City of Pittsburgh's PBV count in 2016 was 366, roughly consistent with HACP's reported total of 446 for that year.

These discrepancies may stem from the assessment's use of online HUD data (which it cites as its source) over the HACP's self-reported numbers. Publicly available data on HUD's online AFFH Tool showed there were a total of 5,653 PBV units as of early 2024, closer to the City's Housing Assessment but still massively higher than what the HACP has reported. It is possible that the Assessment's researchers relied on the AFFH Tool as their source for PBV unit counts.

Another online HUD tool, the HCV Data Dashboard, reported a November total of 902 PBV units, much closer in line with the HACP's totals. Both of these data sources are shown in **Figures 4 and 5** below.

Figure 4

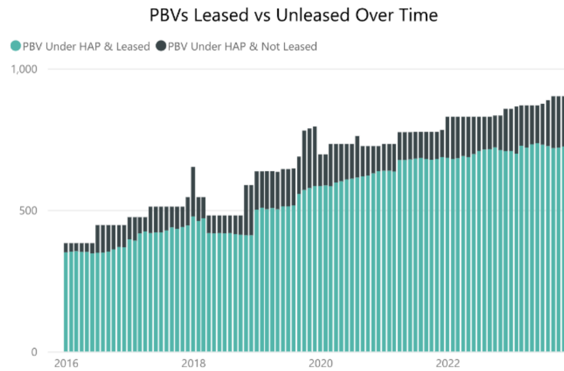


Figure 5

Total Current PBV Units Both Leased & Unleased	PBV Units under HAP but Unleased	Current PBV Unit Utilization
902	177	80.4%

Source: HUD HCV Data Dashboard

Our researchers contacted HUD's Policy and Research Division to determine the potential source of these discrepancies. HUD representatives explained that PBV data found in their AFFH Tool may not be reliable due to the complicated process of RAD conversions and that the total shown might include past demolished or removed units. For that reason, they recommended relying only on the data listed in the HACP's Annual Reports.

If the HACP's reported totals are accurate, the City's Housing Needs Assessments presented an inaccurate snapshot of the City's housing needs in 2020, and the gap between demand and supply may have been far greater than what was estimated.

In the next section, we use a report on the decline in local Black homeownership to examine racial disparities in Pittsburgh's housing needs.

PCRG Report: A Decade in Decline for Black Homeownership in Pittsburgh

In March of 2022, the Pittsburgh Community Reinvestment Group (PCRG) released a report titled *Taking Stock: A Decade in Decline for Black Homeownership in Pittsburgh*, which sheds light on potential drivers of the loss in Black homeownership.[9]

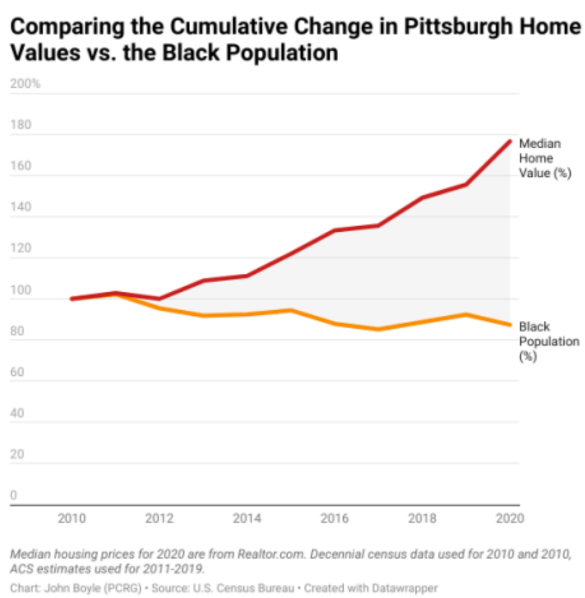
The report states that from 2010 to 2020, **Pittsburgh's Black population fell by about 10,500 residents, a 13.4% decline compared to a 0.9% drop in the overall population**.

During that time, the median home value rose from $88,000 to $149,000 (69.5% increase), while the number of single-family homes owned by corporate entities rose from 1 in 9 to about 1 in 6. Combined, these factors may have disproportionately reduced housing stability for low- and moderate-income homebuyers, and particularly those who are Black; a 2022 report by the National Community Reinvestment Coalition explored various inequities in the private lending market contributing to continued discrimination against households of color.

The racial homeownership gap has been widening at the national level, and to an even greater degree within Pittsburgh and Allegheny County. From 2010 to 2019, Black homeownership fell:

- Nationwide: from 44.1% to 42.0% (2.1-point drop)
- Pennsylvania: from 47.2% to 42.2% (5.0-point drop)
- Allegheny County: from 38.3% to 31.5% (6.8-point drop)
- City of Pittsburgh: from 36.9% to 30.1% (6.8-point drop).

Figure 6



Source: PCRG, "Taking Stock: A Decade in Decline for Black Homeownership in Pittsburgh" (2022)

[9] Pittsburgh Community Reinvestment Group, "Taking Stock: A Decade in Decline for Black Homeownership in Pittsburgh." March 2022. https://www.pcrg.org/black-homeownership-report

These disparities were evident in the rate of mortgage applications submitted by Black and white applicants. From 2013 to 2020, Black residents in Allegheny County submitted an estimated total of 20,390 mortgage applications, of which 48.0% resulted in an originated loan. Comparatively, white residents in the County submitted 291,133 applications during the same period, with 67.3% resulting in a loan.

One reason, as PCRG's report makes clear, is a growing income gap between Black and non-Hispanic white households, a barrier to accessing credit while home costs continue to rise. The average annual income of all Black mortgage applicants in the county from 2013 to 2020 was $91,046, compared to $130,996 for white applicants. The earnings gap narrows when looking only at low- and moderate-income applicants ($47,501 and $49,674 for Black and white applicants, respectively), but white applicants in this category were still approved for loans at a rate of 10.7 percentage points higher than that of their Black counterparts.

Pittsburgh's neighborhoods also remain deeply segregated, with roughly 75% of Black residents located in the bottom half of percentiles of census tracts by average earnings. This can result in a variety of socioeconomic factors inhibiting homeownership at various points: higher unemployment, higher rates of single parent households, lower levels of educational attainment, and lower availability of affordable housing.

While the HACP is unable to directly remedy discrimination in the lending market or corporate consolidation of housing stock, it remains the primary originator of affordable units for economically vulnerable communities in the city. Reversing the displacement of the Black community in Pittsburgh and narrowing the region's racial wealth gap must begin with a commitment by the HACP to maximize the number of housing-stabilized units available throughout the city and building upon available resources like the Homeownership Program.

Section 2: Key Takeaways

1. Pittsburgh's 2022 Housing Needs Assessment estimated that 2 in 5 renters citywide were cost burdened, concentrated mostly among those making under $35,000. It also estimated that the number of renters under 30% of AMI fell by over 3,000 – not due to improved economic standing, but because they left the city.

2. Based on conversations with HUD staff, our research raises questions with the Assessment's count of subsidized housing units citywide. There is a strong possibility the Assessment's researchers relied on inaccurate PBV counts originating from HUD data systems, resulting in an underestimation of the city's affordable housing gap.

3. PCRG's 2022 report on Black homeownership in Pittsburgh revealed that not just Black renters have left the city. From 2010 to 2019, Black homeownership in Pittsburgh fell by 6.8 points, over three times the national average over the same period. The racial income gap, consolidation of single-family homes by corporate entities, and discrimination in lending are speculated to be the main drivers.

Section 3: Repositioning of Public Housing Stock and Changes to Total Households Served

Federal Changes in Public Housing Policy

The federal government began making sharp cuts to funding for public housing in the 1980s and 1990s, resulting in a growing backlog of capital needs. By this time, structural rehabilitation was no longer a possibility in some developments: either the initial construction was substandard and living conditions had grown to severely distressed condition, or developments had simply outlived their useful life expectancy. In addition, passage of the Faircloth Amendment in 1998 placed a hard cap on the number of public housing units a local authority could operate, freezing totals at their 1999 levels. After decades of rapidly expanding their public housing inventories, most metropolitan public housing agencies were forced to make difficult decisions regarding those assets.

In 1992, Congress authorized the first HOPE VI grants in response to a report from a national commission finding that around 6% of public housing units were severely distressed.[10] HOPE VI provided grant funding for public housing agencies to demolish or renovate distressed properties and relocate residents. In 1995, the requirement that any demolished public housing units be replaced one-for-one was repealed by Congress, paving the way for local housing agencies to begin tearing down dilapidated high-rise projects. Additionally, Section 539 of the Public Housing Reform Act of 1999 authorized PHAs to participate in mixed-finance projects for the construction or rehabilitation of units in their inventories, opening the door to privately managed public housing.

According to HUD's 2017 analysis, the HOPE VI program demolished 98,592 public housing units between 1993 and 2010 and produced 97,389 mixed-income units.[11] **Only about 57% of those units were replacements for those demolished.** Affordable and market-rate units made up the remainder, about 30% and 13% respectively. Those latter categories, accounting for over 42,000 units, represent a net loss to the public housing program, and the displacement of low-income families following demolitions remains a lingering criticism of its legacy.

While the quality of housing was typically far superior and benefitted households who were able to return, the overall contraction of America's housing safety net continues to have lasting impacts on the current affordable housing shortage. According to a 2012 report by the Congressional Research Service, **only 38% of original residents returned to new sites**.[12]

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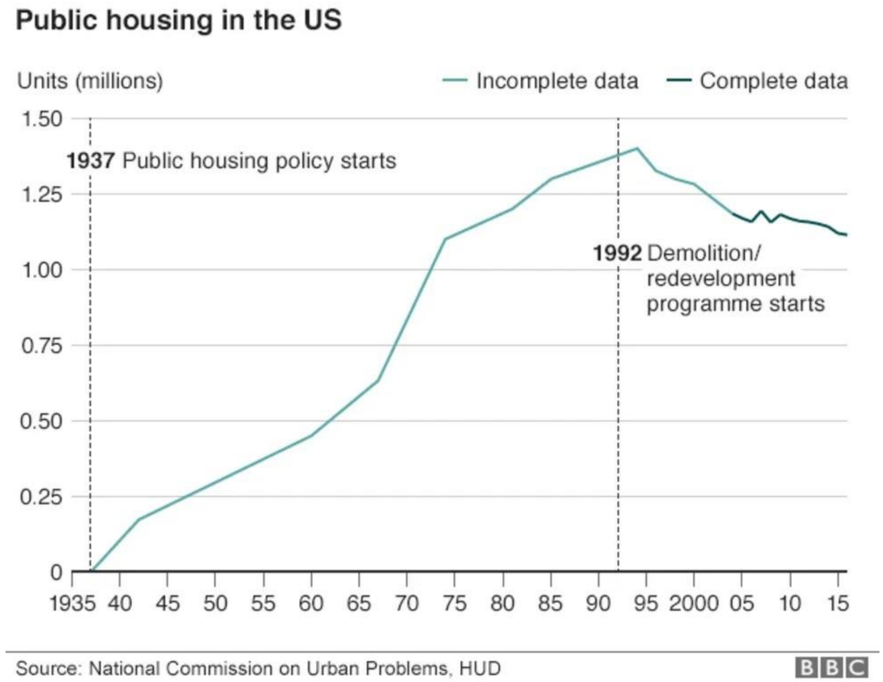
[10] The National Commission on Severely Distressed Public Housing, "The Final Report of the National Commission on Severely Distressed Public Housing." August 1992. https://www.hud.gov/sites/documents/DOC_9836.PDF

[11] U.S. Department of Housing and Urban Development Office of Policy Development and Research, "HOPE VI Data Compilation and Analysis." March 20, 2017. https://www.huduser.gov/portal/pdredge/pdr-edge-research-032017.html

[12] Congressional Research Service, "Hope VI Public Housing Revitalization Program: Background, Funding, and Issues." January 6, 2012. https://crsreports.congress.gov/product/pdf/RL/RL32236/18

Figure 7



Source: BBC, "Why is America pulling down the projects?" (2016)

Partially in response to the program's criticisms, subsequent presidential administrations did not request additional funding for HOPE VI after 2003. Congress continued to appropriate funds, albeit at a third of its prior funding levels.

Instead, by the early 2010s, HUD and federal policymakers increasingly focused on the "repositioning" of public housing assets in a manner that would avoid HOPE VI's negative impacts. In 2011, Congress authorized the Rental Assistance Demonstration (RAD), one of four available options for public housing agencies to convert Section 9 Public Housing units into long-term, project-based Section 8 rental contracts.[13] In turn, public housing agencies can sign long-term leases with private developers to manage those units. Private developers are also sometimes awarded Low-Income Housing Tax Credits (LIHTC) for these proposed projects in order to leverage greater equity and achieve deeper affordability. Unlike most other affordable housing financing sources, LIHTCs are administered and awarded by the Pennsylvania Housing Finance Agency (PHFA).[14]

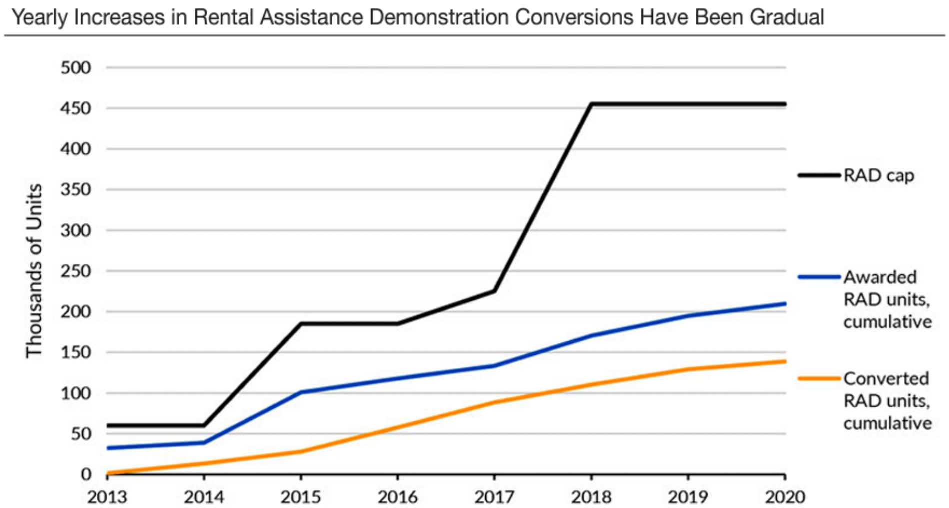
As of October 2022, an estimated 163,973 public housing units had been converted nationwide, another 54,122 had received approval for conversion, and 124,467 were in reserve as potential future conversion. Total conversions are subject to a cap set by Congress. In 2018, Congress

[13] Project-Based Vouchers (PBV) and Project-Based Rental Assistance (PBRA) are the most common conversion vehicles. Section 18 Demolition/Disposition, Streamlined Voluntary Conversion, and Section 32 Homeownership Program are also available as conversion options.

[14] The Choice Neighborhoods Initiative, established in 2010, is another successor to the HOPE VI program. Due to limited funding, it is a highly competitive program and has converted far fewer units nationwide than RAD.

lifted it to a maximum of 455,000 units (**Figure 8**). Over time, this has the potential to convert at least 45% of the national public housing inventory into privately managed units.[15]

Figure 8



Source: Urban Institute, "Impact of Rental Assistance Demonstration Program Conversions on Public Housing Tenants" (2021)

The shift from traditional public housing to mixed-financing platforms comes with both benefits and drawbacks. For public housing agencies, RAD allows for the private financing of public housing units by shifting their management into private hands while allowing them to leverage private debt and equity to finance upgrades. This also makes long-term planning more sustainable, since funding is no longer tied to fluctuations in federal funding or the changing priorities of new administrations.

For tenants, RAD was designed to incorporate a number of protections that HOPE VI lacked.[16] These include a right for tenants whose units are impacted to return and continue receiving assistance in a completed unit and, crucially, requiring *one-for-one replacement*, meaning all properties must retain the same number of deeply subsidized units. Agencies must also plan such redevelopments more carefully and carry it out in phases to minimize resident relocations. Since subsidized units are often embedded within mixed-income developments and are indistinguishable from private units, the "quality gap" that became associated with outdated public housing developments is often avoided.

RAD's protections appear to have resulted in more positive experiences for existing public housing tenants than under HOPE VI. A 2019 study by the Urban Institute found that 63.4% of public housing tenants whose units were impacted by RAD conversions were able to remain in the unit throughout the process, 10.3% relocated but returned to the original unit, and 22.8% relocated but did not return. Of those who relocated, 77.1% reported that they received moving

[15] Ed Gramlich, "Rental Assistance Demonstration" (National Low Income Housing Coalition's 2023 Advocates' Guide). 2023. https://nlihc.org/sites/default/files/2023-03/2023AG4-09_RAD.pdf

[16] U.S. Department of Housing and Urban Development, "RAD Resident Rights in Public Housing." https://www.hud.gov/sites/dfiles/Housing/documents/RAD_Resident_Rights_in_Public_Housing_Web.pdf

assistance. About 55% of those who received a new unit reported that their post-conversion unit was better in quality, 35% reporting about the same quality, and 9% reporting worse quality.[17]

On the other hand, shifting ownership and management from public to private hands has also been met with some criticism. Some have noted that despite having the same rights as public housing occupants on paper, enforcement of these rights by HUD has been lacking. A 2018 report by the US GAO found that HUD "does not systematically use its data systems to track effects of RAD conversions on resident households" and that its monitoring of tenant protections was weak.[18] HUD reported that it had implemented all proposed recommendations in the following years, including a red flag warning system to alert program staff.

HACP Changes in Public Housing Stock

To illustrate the changes in the HACP's housing stock over time, our researchers compiled the total number of households actually served in each program, as found in each of the HACP's MTW Annual Reports. Due to unclear and shifting presentation of that data beginning in its 2021 report, the researchers requested actuals for the years 2021 and 2022, as well as earlier years for senior-based and family-based households.

HOPE VI Demolitions of Distressed Public Housing

The HACP summarizes its repositioning strategy as a combination of preserving successful developments while revitalizing distressed developments through "strategic investments" that prioritize mixed-income communities and lowering population densities. The Authority also addressed the loss of public housing units by stating the following:

> "A by-product of these redevelopment efforts is a reduced number of traditional, public housing units. This has been balanced by the addition of new affordable units supported by tax credits, project-based Housing Choice Vouchers, and new units rented at market rates. In some of the HACP's mixed finance/mixed-income developments, a portion of the market rate units are rented at levels affordable to some low-income (80% of AMI) households. The traditional Housing Choice Voucher program also supports low-income families and occupancy of units available in the private market."[19]

By the year 2000, the HACP began the process of utilizing HOPE VI grants to demolish and replace a number of developments. These included:[20]

- Allequippa Terrace ($31.6 million awarded in 1992)
- Manchester ($7.5 million awarded in 1995)
- Bedford Additions ($26.6 million awarded in 1996)

[17] Stout et al., "Final Report: Evaluation of HUD's Rental Assistance Demonstration (RAD)" (Urban Institute). June 2019. https://www.huduser.gov/portal/sites/default/files/pdf/RAD-Evaluation-Final-Report.pdf
[18] U.S. Government Accountability Office, "Rental Assistance Demonstration: HUD Needs to Take Action to Improve Metrics and Ongoing Oversight." GAO-18-123, February 20, 2018. https://www.gao.gov/products/gao-18-150
[19] Housing Authority of the City of Pittsburgh, "FY 2024 MTW Annual Plan". Page 8. October 12, 2023. https://www.hud.gov/sites/dfiles/PIH/documents/PittsburghFY24Plan.pdf
[20] U.S. Department of Housing and Urban Development, "HOPE VI Revitalization Grants as Originally Awarded." Revised June 2011. https://www.hud.gov/sites/documents/DOC_10014.PDF

Other major demolitions in the 2000s, not related to HOPE VI, include the Garfield Heights High Rise (in 2005), the Kelly Street High Rise (in 2007), Louis Mason Jr. High Rise (part of Addison Terrace, in 2008), Auburn Towers (in 2008), and St. Clair Village (in 2010). While not public housing developments, three developments in East Liberty housing low-income renters through the HUD-Assisted Multi-Family Housing program were also demolished due to poor building conditions throughout the decade: Liberty Park and the East Mall (in 2001) and Penn Circle Apartments (in 2009).

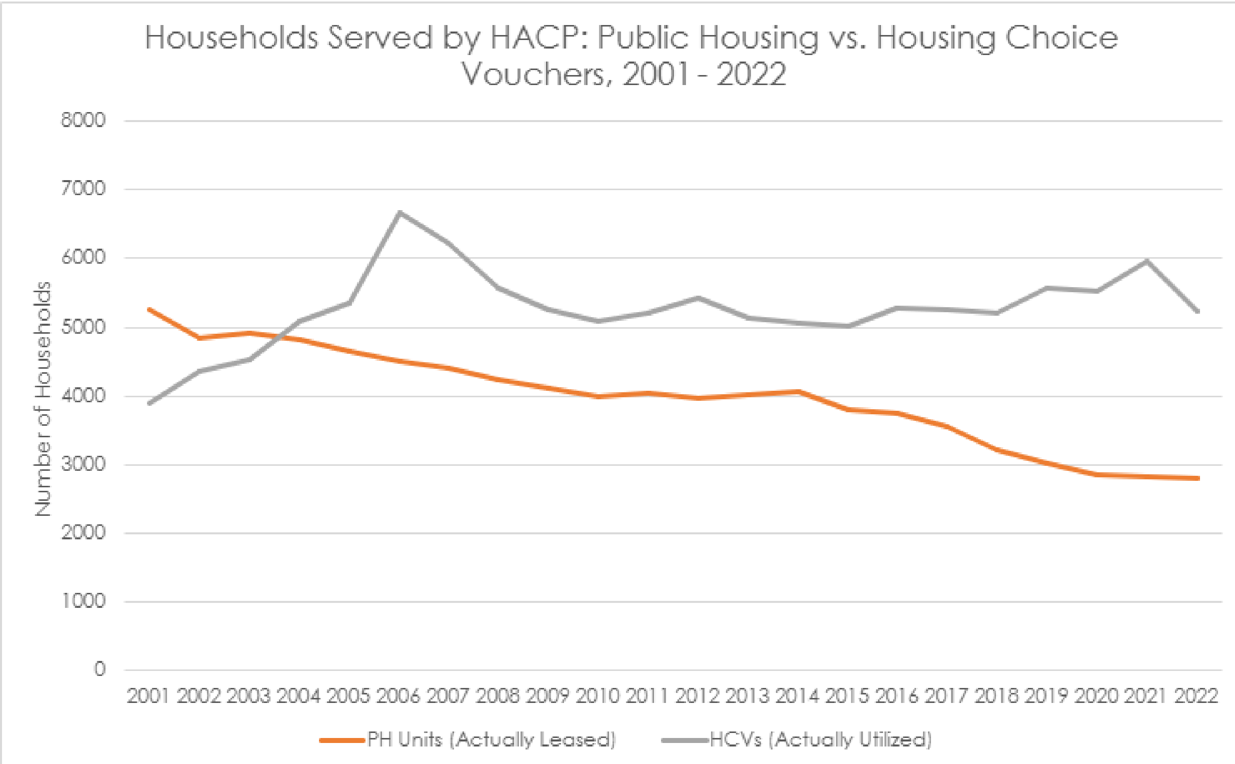
These efforts appear to have had a positive effect on HACP finances. The Authority reported that in 2007, it had reversed years of net losses and finally achieved a budget surplus.[21]

By this time, the number of public housing units managed by the HACP was on the decline and has continued down that trajectory, reflecting the Authority's strategy of replacing outdated high-rise properties exclusively for public housing tenants with mixed-income developments in partnership with private developers. Despite this, the total number of households served by the HACP continued to increase through 2006, at least partially attributable to a rapid increase in the number of Housing Choice Voucher holders. From 2007 to 2010, that figure began to contract and has since hovered between 5,000 and 6,000 recipients.

As **Charts 1 and 2** show, the loss of units in the Public Housing program has been the main driver of these trends, falling from 5,246 units leased in 2000 to 2,801 in 2022, a loss of **2,445 potential households** (46.6% decline). While the HCV program has experienced temporary increases in capacity, it has not been enough to make up for losses in Public Housing units. At its peak in 2007, the HACP served a combined **10,641 households** in the Public Housing and HCV programs, falling to **8,025 households** by 2022.

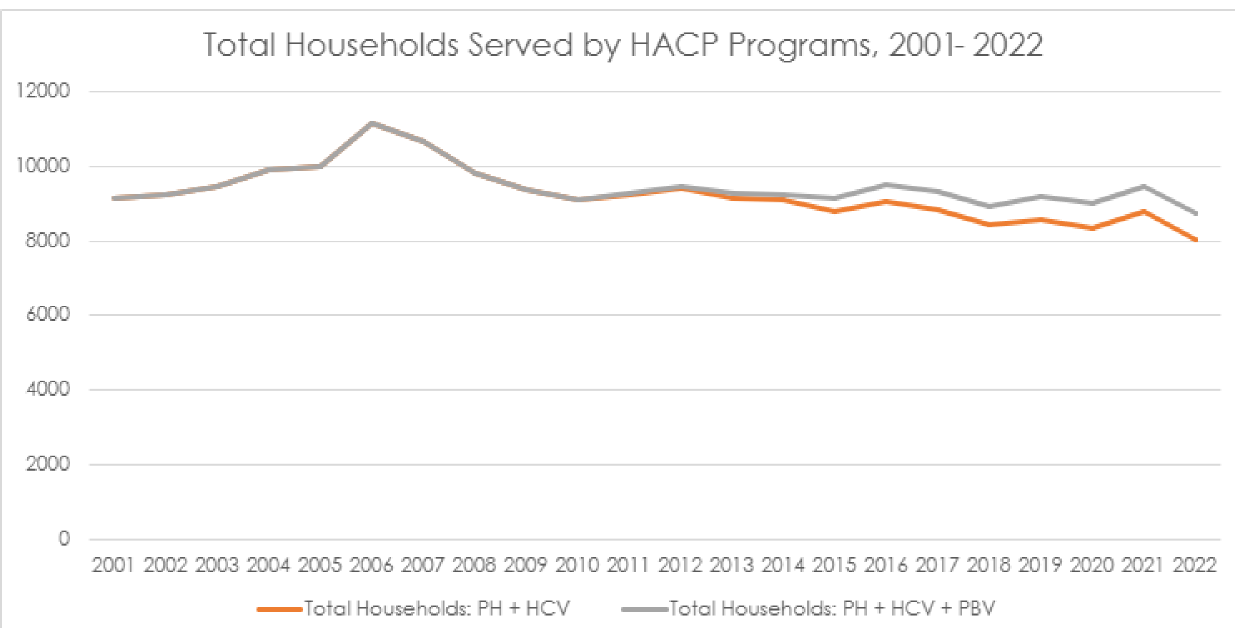
[21] Housing Authority of the City of Pittsburgh, "2007 Annual Report". Page 3. 2007. https://hacp.org/app/uploads/2019/04/2007-HACP-Annual-Report.pdf

Chart 1



Source: HACP MTW Annual Reports (2007-2023)

Chart 2



Source: HACP MTW Annual Reports (2007-2023)

One important note is that while the HACP may be authorized by HUD to distribute a certain number of vouchers in a given year, the amount of federal funding provided is usually not adequate to cover the cost of leasing to an equal number of units. For example, in 2012 the HACP had authorization for 6,757 MTW vouchers and 316 non-MTW vouchers but only served 5,430 households under that program.

Yet as mentioned, MTW agencies retain considerable discretion over how they choose to allocate these already limited funds, including towards mixed-finance development. A 2019 Public Source article raised questions about whether these redevelopment efforts were being prioritized above (or even at the expense of) the Authority's Housing Choice Voucher program, pointing out that it had spent $58 million from its HCV program since 2011 on mixed-income housing projects despite over 8,600 families remaining on the waitlist and serving fewer families than it had a decade prior.[22]

HACP officials have often responded that landlord discrimination against voucher holders is a persistent barrier to getting recipients into actual units. While housing discrimination remains a pressing issue, the Authority's internal program management deficiencies should not be discounted, as explored in **Section 1**. The alternative – increasing supply and placing eligible households in PBV units – is a reasonable strategy, but it should be accomplished alongside a well-functioning HCV program.

HACP Development Program: Establishment of ARMDC and Shift to Mixed-Finance Projects

Over the next decade, the HACP utilized its funding flexibility as a Moving to Work agency to make several important strategic decisions. First, it established Allies & Ross Management Development Corporation (ARMDC) in 2007 as a nonprofit component of the HACP to facilitate mixed finance developments. Second, in 2012, it implemented the *Step Up to Market Financing Program*, which also utilizes this flexibility to identify distressed properties and leverage debt to finance project-based voucher (PBV) replacement units in redevelopment projects.

The program was then expanded in 2017 to include the Project-Based Voucher/Gap Financing ("*PBV/Gap Financing*") component, a "last resort development financing" option for owners and developers to rehabilitate or create affordable rental units. ARMDC acts as the lender of Gap Financing loans. Combined, these components make up the core of the HACP's "development program."

Since then, PBVs have become one of the HACP's main strategies for its "repositioning" of aging public housing stock. The total number of PBV units in the city has increased drastically, representing **712 households** in 2022 (**Chart 3**). Still, this has not been enough to achieve one-for-one replacement of prior public housing units lost or to outpace recent declines in the number of Housing Choice Voucher recipients.[23]

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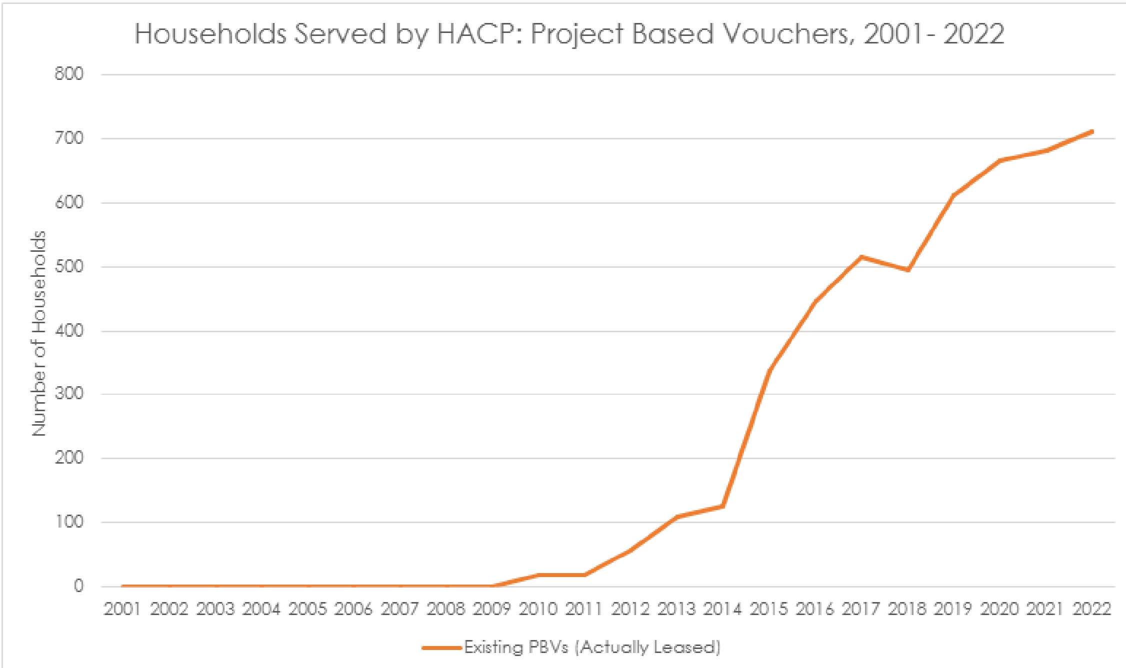
[22] Tom Lisi, Varshini Chellapilla, and Juliette Rihl, "Pittsburgh's housing authority is spending millions in Section 8 voucher funds to build affordable housing." *PublicSource*, December 9, 2019. https://www.publicsource.org/how-pittsburghs-housing-authority-is-spending-millions-in-section-8-funds-to-build-affordable-housing

[23] In the HACP's 2010-2012 MTW Reports, certain PBV units were listed under a separate table, "units administered by HACP but not included in HACP's voucher authorization or leasing data", mostly accounting for single-room occupancy units at YMCA and housing for veterans at Veteran's Place. These were excluded from the totals in the chart.

Chart 3



Source: HACP MTW Annual Reports (2007-2023)

The HACP and ARMDC have utilized this program for the following developments, as found in its 2024 MTW Annual Report (Note: this includes project-based vouchers that are both leased and planned/committed):[24]

Table 3

Developments with Project-Based Vouchers (as of 2024)					
Property Name	**Council District**	**Total Project Based Vouchers**	**Planned Status at End of Year**	**RAD?**	**Project Description**
Allegheny Dwellings I (Sandstone Quarry)	1	47	Leased	No	HAP Contract in place. Phase I of Allegheny Dwellings Redevelopment
Cedarwood Homes	2	24	Committed	No	PBV/Gap Financing
Sycamore Street Apartments	2	15	Leased	No	HAP Contract in place.
Hillcrest Senior Apartments	4	16	Leased	No	HAP Contract in place
Gladstone Residents	5	20	Committed	No	PBV/Gap Financing. 2023 Construction Completion
Addison Phase III (Middle Hill)	6	37	Leased	No	HAP Contract in place. Third phase of Addison Terrace Redevelopment

[24] Housing Authority of the City of Pittsburgh, "FY 2024 MTW Annual Plan." Pages 34-36. October 15, 2023. https://hacp.org/app/uploads/2023/09/2024MTWAnnualPlan-August-11-2023-DRAFT.pdf

Addison Phase IV (Kelly Hamilton Homes)	6	42	Leased	No	HAP Contract in place. Fourth and final phase of Addison Terrace Redevelopment
Allegheny Union Baptist Association	6	36	Leased	No	HAP Contract in place. Senior building
City's Edge	6	92	Committed	No	PBV Mixed-Finance (49) CNI Replacement Units (43)
Crawford Square	6	60	Leased	No	Part of multi-stage HAP Contract is in place. Currently undergoing modernization.
Dinwiddie III and IV	6	24	Leased	No	HAP Contract in place
Legacy Apartments (Senior)	6	18	Leased	No	HAP Contract in place. Senior building.
Letsche School	6	25	Committed	No	PBV/Gap Financing
Lofts at Bentley (Addison Phase II)	6	64	Leased	No	HAP Contract in place. Phase II at Addison Terrace Redevelopment
Mackey Lofts	6	11	Leased	No	HAP Contract in place. Building for hearing-impaired households
Millers Street Apartments	6	9	Leased	No	PBV/Gap Financing. HAP Contract in place.
Milliones Manor (Senior)	6	39	Leased	No	HAP Contract in place. Senior building
New Granada Square Apartments	6	10	Leased	No	PBV/Gap Financing. HAP Contract in place.
Skyline Terrace (Addison Phase I)	6	168	Leased	No	HAP Contract in place. First Phase of Addison Redevelopment
Wood Street Commons	6	65	Leased	No	HAP Contract in place. Single room occupancy (SRO) units located downtown.
Doughboy Square	7	9	Leased	No	HAP Contract in place
East Liberty Place South	9	6	Leased	No	HAP Contract in place
Elmer Williams Square	9	37	Leased	No	PBV/Gap Financing. HAP Contract in place.
Harvard Beatty	9	8	Leased	No	PBV/Gap Financing.
Larimer Pointe	9	40	Leased	No	HAP Contract in place
Larimer/East Liberty Phase I	9	28	Leased	No	HAP Contract in place
Larimer/East Liberty Phase III	9	19	Committed	No	CNI Replacement Units
Larimer/East Liberty Phase IV	9	18	Leased	No	CNI Replacement Units
Lemington Senior Housing	9	54	Leased	No	HAP Contract in place
Mellon's Orchard South	9	12	Leased	No	HAP Contract in place
North Negley Residences	9	13	Committed	No	PBV/Gap Financing. 2022 Construction Completion
Stanton-Highland	9	23	Committed	No	PBV/Gap Financing.
Total		**1,024**			

Source: HACP 2024 MTW Annual Report

An additional 310 PBV units are listed as anticipated for the plan year. As the Authority pursues repositioning and more legacy units come offline, these alternative tools for financing affordable housing units may eventually come to replace the traditional public housing program locally.

HACP Development Program: Budget, Transfers, and Spending

From 2013 to 2020, the HACP's MTW Annual Reports clearly showed how much was budgeted for the development program. As of 2021, those reports began combining that sum with another category ("modernization, protective services, and resident services"). Through a Right to Know request, our researchers received those amounts for years 2021 and 2022. Total amounts budgeted for development are shown in the **Table 4** below; those obtained through a Right to Know request have been italicized.

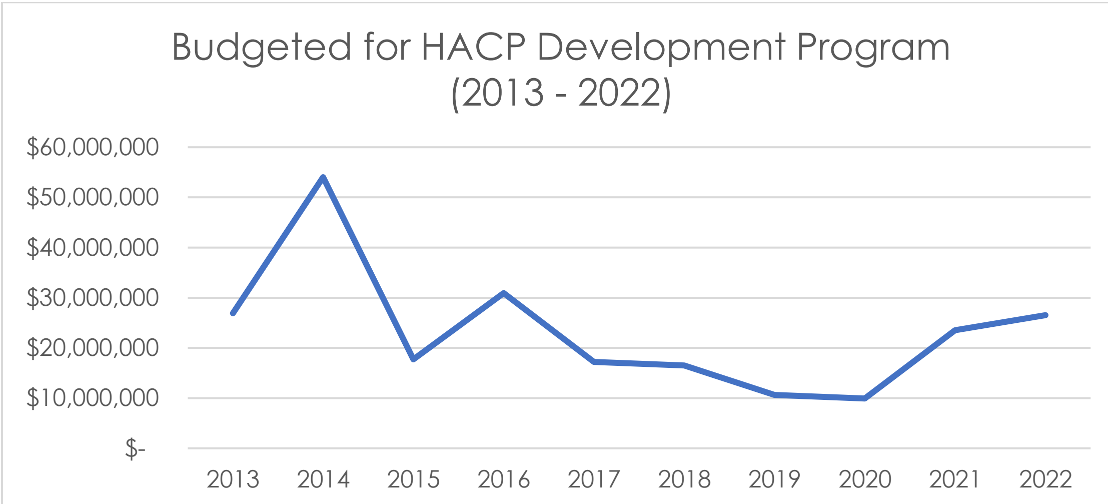
It remains unclear how the HACP determines amounts needed for its development budget. Our researchers requested records showing the methodology used to determine these amounts, but the Authority's response did not provide a clear answer, instead referring back to their MTW Annual Reports.

Table 4

HACP Development Budget and Operating Transfers to ARMDC (2014-2022)		
Year	**Budgeted for Development**	**Operating Transfers to Component Unit (ARMDC)**
2014	$54,038,237	$60,457,670
2015	$17,705,784	$10,423,688
2016	$30,953,684	$26,278,052
2017	$17,178,291	$6,163,223
2018	$16,506,788	$35,737,277
2019	$10,639,757	$44,494,568
2020	$9,923,124	$22,711,352
2021	*$23,552,568*	$22,837,651
2022	*$26,500,000*	$27,500,000
Total	**$206,998,233**	**$256,603,481**

Source: HACP MTW Annual Reports (2013-2020), Right-to-Know Request

Chart 4



Source: HACP MTW Annual Reports (2013-2020), Right-to-Know Request

The researchers also requested and received HACP's single audits, conducted by Maher Duessel, for years 2014 through 2022. Using the audits' Financial Data Schedules, total transfers from four programs (Public Housing, Section 8 Housing Choice Voucher, Choice Grant, and Clean Slate E3) into two development program accounts ("Business Activities" and ARMDC) are shown in **Table 5**. From 2014-2022, net transfers amounted to about $313.3 million.

Table 5

Operating Transfers: Major HACP Programs, 2014 - 2022						
Year	**Public Housing**	**Section 8/HCV**	**Choice Grant**	**Clean Slate E3**	**Business Activities**	**ARMDC**
2014	$(34,466,740)	$(13,342,000)	--	--	$(12,648,930)	$60,457,670
2015	$1,000,000	$(8,080,784)	$(2,240,284)	--	$(1,102,620)	$10,423,688
2016	$(6,000,000)	$(18,268,987)	$(2,009,065)	--	--	$26,278,052
2017	$(337,897)	$(5,825,326)	--	--	--	$6,163,223
2018	$(75,849,072)	$(17,525)	--	$215,177	$39,914,143	$35,737,277
2019	$(52,525,740)	--	$(496,140)	--	$8,527,312	$44,494,568
2020	$(528,337)	$(24,537,091)	$(1,132,424)	--	$3,486,500	$22,711,352
2021	$(40,648,703)	--	$(712,211)	--	$18,523,263	$22,837,651
2022	$(27,500,000)	--	--	--	--	$27,500,000
Total	**$(236,856,489)**	**$(45,534,622)**	**$(6,590,124)**	**$215,177**	**$56,699,668**	**$256,603,481**
	Net Transfers Out: $(288,766,058)				**Net Transfers In: $313,303,149**	

Source: Maher Duessel Single Audits of HACP, Financial Data Schedules Line Item 10040 (Operating transfers from/to component unit)

The researchers requested a list of ARMDC's expenses for the most recently available year, a summary of which is shown below:

Table 6

ARMDC Unaudited Income Statement (December 31, 2023)		
FDS Line Item	**Description**	**Total**
71100	Investment Income – Unrestricted	$6,037,812
71500	Other Revenue	$4,456,215
70000	**Total Revenue**	**$10,494,027**
91100	Administrative Salaries	$118,646
91400	Advertising and Marketing	$6,463
91500	Employee Benefit Contributions – Administrative	$34,766
91600	Office Expenses	$18,056
91700	Legal Expense	$364
91900	Other	$204,089
91000	**Total Operating – Administrative**	**$382,384**
96120	Liability Insurance	$7,677
96130	Workmen's Compensation	$142
96100	**Total Insurance Premiums**	**$7,819**
96200	Other General Expenses	$1,502,529
96500	Bad Debts – Mortgages	$5,410,966
96000	**Total Other General Expenses**	**$6,913,495**
96900	**Total Operating Expenses**	**$7,303,698**
97000	Excess of Operating Revenue over Operating Expenses	$3,190,329
97100	Extraordinary Maintenance	$388,934
90000	**Total Expenses**	**$7,692,632**
10040	**Operating Transfers from/to Component Unit**	**($8,000,000)**
10100	**Total Other Financing Sources (Uses)**	**($8,000,000)**
	Total Expenses	($307,368)
10000	**Excess (Deficiency) of Total Revenue Over (Under) Total**	**$10,801,395**

Source: HACP Right-to-Know Request

Households Served by Nontraditional Activities

Public housing agencies in the Moving to Work Demonstration are federally authorized to combine three eligible funding streams from traditional HUD programs (Public Housing Operating, Public Housing Capital, and Housing Choice Voucher funds) and allocate them toward HUD-approved "local nontraditional" (LNT) activities, as long as five statutory requirements are met. Those requirements are explored further in **Section 4**.

A list of all approved activities, as of the 2024 MTW Annual Report, are shown in **Table 7.**

Table 7

HACP's HUD-Approved Local Nontraditional Activities	
Activity	**Plan Year Implemented**
1. Pre-Approval Inspection Certification	2015
2. Preferred Owners Program	2015
3. Modified Rent Policy – Work or FSS Requirement or increased minimum tenant payment for non-exempt HCV households	2011
4. Modified Rent Policy – Work or FSS Requirement or increased minimum rent for non-exempt LIPH households	2008
5. HCV Revised Recertification Policy – at least once every other year	2008, 2009
6. Homeownership Program: a. Operation of Combined LIPH and HCV Homeownership Program b. Program assistance to include soft-second mortgage assistance, closing cost assistance, homeownership and credit counseling, and foreclosure prevention	2007
7. Modified Housing Choice Voucher Program policy on maximum percent of Adjusted Monthly Income permitted	2001
8. Modified Payment Standard Approval	2004
9. Step Up to Market Financing Program *Use of Block Grant Funding Authority for Development, Redevelopment, and Modernization to include LNT Development (I.e., PBV/Gap Financing)*	2013
10. Local Payment Standard – Housing Choice Voucher Program	2019
11. Asset Exclusion & Self-Certification in HCV and Public Housing Programs	2023

Source: HACP 2024 MTW Annual Report

The HACP has reported total households served by LNT activities since 2010. However, the Authority noted in their 2020 MTW Annual Report that between 2010 and 2018, Project-Based Vouchers were mistakenly included in those totals and would not be counted toward LNT households served moving forward. In 2022, **148 households** were served by LNT activities.

Homeownership Program

One of those LNT activities is the HACP's Homeownership Program, which was approved and implemented as a combined program for Public Housing and HCV participants in 2007, though the Authority engaged in homeownership activities with tenants prior to that date.

Eligible participants include those who have not previously owned a home and are active participants in either the public housing or HCV programs. The household member(s) seeking to purchase a home must also have annual earnings of at least 50% of the area median income. Eligible properties include single-family homes, rowhomes, townhomes, and condominiums, but not multifamily housing. The program's benefits are portable to homes outside of the HACP's jurisdiction (i.e., the City of Pittsburgh) if an outside public housing agency is administering a similar program and is willing to accept participants.

Once a resident expresses interest in finding a home, HACP staff provides educational guidance that includes credit repair counseling and mortgage financing options. From there, the tenant must receive a loan preapproval letter, after which they can finally begin looking for a home.

Other HACP activities have been designed to incentivize participation in the Homeownership Program. The **Family Self-Sufficiency (FSS) Program**, in particular, places a portion of tenants' rent payments in an escrow account that can later be used for home purchase costs.

As of the HACP's most recently amended Homeownership Program Plan and Procedures, the maximum amount of financial assistance a household can receive is $8,000 for a home warranty and closing costs assistance. In the event that a buyer defaults on their mortgage within five years of the closing date, they can receive up to six months of HACP mortgage assistance (up to a maximum of $3,000) if they also apply for and comply with the Pennsylvania Homeowners' Emergency Mortgage Assistance Program.

The HACP's 2013 MTW Annual Report included a "Preliminary Homeownership Demonstration Evaluation Report" conducted by the University of Pittsburgh's Graduate School of Public and International Affairs (GSPIA) Center for Metropolitan Studies.[25] Subsequent MTW reports reference continued work with the Center to evaluate and improve the program, but the HACP does not appear to have published those results. However, focus group testing of FSS participants was conducted by the University and is explored in-depth in **Section 4**.

Though the report only captures early years of the consolidated program's activities, its findings provide useful context:

- Households waited an average of 8.3 months for their preapproval letters, but about half received theirs in less than 4.5 months. A large standard deviation indicated high variation from person to person.
- The average time between a household receiving a preapproval letter and actually closing on the purchase of a home was 6.57 months, but the median was 4.0 months. There was also significant variation, with one participant waiting over four years to close on a purchase.
- The average time of overall participation (from a participant's education start date through a home purchase) was 14.5 months, with a median of 11.5 months. Again, there was significant variation.
- About 63% of participants in the Homeownership Program were Section 8 tenants and 37% were public housing tenants.
- The most popular neighborhoods for home purchases were Glen Hazel (11.3% of all purchases), Sheridan (9.3%), Carrick (7.2%), Garfield (7.2%), and Upper Hill (7.2%). A majority of homes were purchased in neighborhoods where the average property age range from 82-102 years old.
- The average home sale price (including closing costs) was $71,387 and the median was $64,950. Closing costs were $3,782 on average.

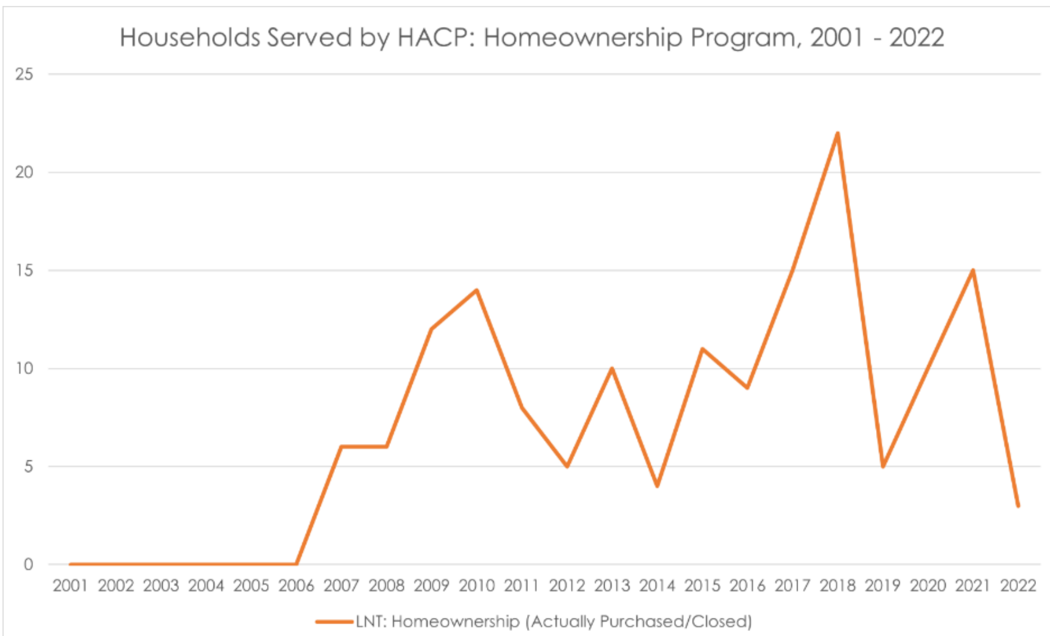
[25] Housing Authority of the City of Pittsburgh, "Moving to Work Demonstration Year 13 (FY 2013) Annual Report." Pages 107-138. Submitted March 31, 2014. https://hacp.org/app/uploads/2019/02/HACP_2013_MTW_Annual_Report.pdf

The researchers noted that foreclosure data was not available, but the HACP self-reported at the time that there had been no foreclosures since the Homeownership Program began.

The report's recommendations include better documentation and case tracking of participant progress, establishing standards on expected time length between activities to investigate outlier cases, and improved communication with the most frequently used lenders.

Shown below are the number of homes actually purchased and closed for participants by year. According to data reported by the HACP in its annual MTW reports, the Authority has helped close on the purchase of **155 homes** for qualifying households since 2007. Home purchases prior to this date are not included.

Chart 5

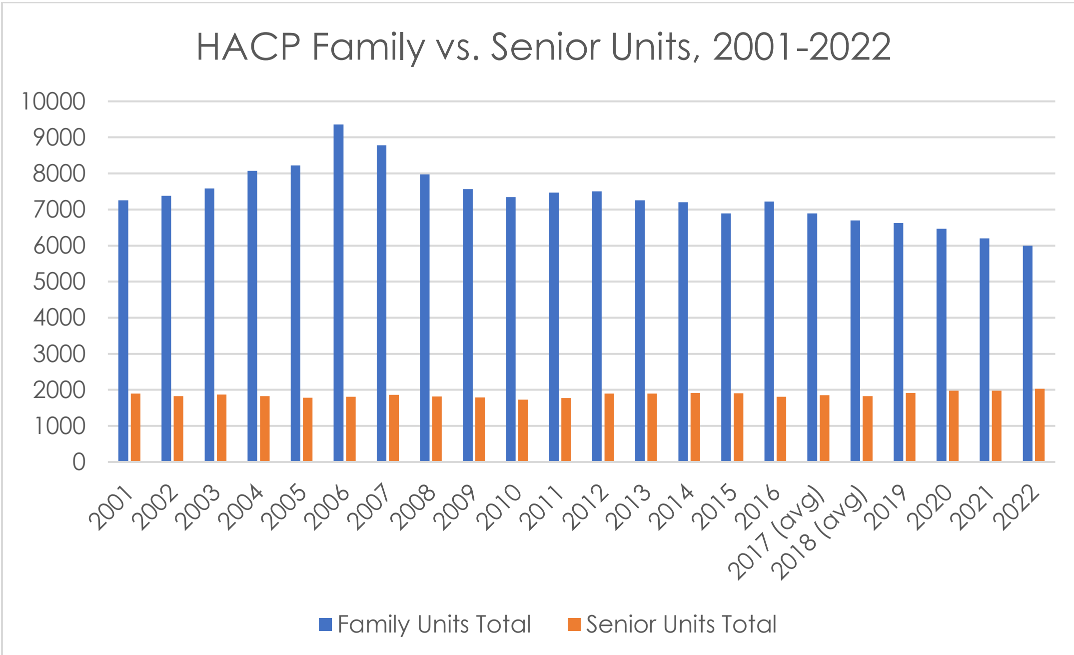


Source: HACP MTW Annual Reports (2007-2023)

Family vs. Senior Units in HACP Inventory

The loss of units has not been proportional across types. The HACP reports to HUD the number of family-based and senior-based households served for both the Public Housing and Housing Choice Voucher programs. When combining the total number of family units and the total number of senior units for each program, clear differences emerge: the number of senior units has remained virtually unchanged and has actually increased in recent years, while family-based units have taken the brunt of public housing losses. **In 2006, the HACP served 9,356 family-based households, but by 2022 this had fallen to 5,999 (decline of 35.9%).**

Chart 6



Source: HACP MTW Annual Reports (2007-2023)

Racial Disparities Between Programs

Until its 2016 MTW Annual Report, the HACP consistently reported the racial demographic data of households served, broken down both by program and by family-based or senior-based households.

That demographic data was not presented in the 2016 report. It returned in the 2017 and 2018 reports, but the figures provided either did not match totals found in other sections or only showed monthly totals. From the 2019 MTW Report onward, racial demographic data has not been presented.

To examine how racial disparities have changed in these categories over time, we selected three comparison years where full and consistent data was available: 2001, 2010, and 2015.

Table 8 below shows the racial composition of the public housing and Housing Choice Voucher programs, disaggregated further by their family-based and senior-based components. While the number of Hispanic and Asian or Pacific Islander HACP residents increased slightly during this period, the vast majority remain either Black or white and our examination will focus on trends between these two groups specifically.

Table 8

Public Housing: Family-Based				Housing Choice Vouchers: Family-Based				All Family-Based Households (PH + HCV)			
	2001	2010	2015		2001	2010	2015		2001	2010	2015
Black	95.4%	94.6%	91.3%	**Black**	67.9%	80.0%	81.6%	**Black**	82.3%	83.3%	85.1%
White	4.3%	3.4%	7.2%	**White**	23.3%	18.8%	17.0%	**White**	13.3%	15.3%	13.4%
Hispanic	0.1%	1.5%	1.1%	**Hispanic**	0.2%	0.9%	0.9%	**Hispanic**	0.1%	1.1%	1.0%
Asian/Pacific Islander	0.1%	0.1%	0.2%	**Asian/Pacific Islander**	0.1%	0.2%	0.3%	**Asian/Pacific Islander**	0.1%	0.1%	0.3%
Other	0.2%	0.3%	0.2%	**Other**	8.5%	0.1%	0.3%	**Other**	4.2%	0.2%	0.2%

Public Housing: Senior-Based				Housing Choice Vouchers: Senior-Based				All Senior-Based Households (PH + HCV)			
	2001	2010	2015		2001	2010	2015		2001	2010	2015
Black	70.3%	76.7%	84.8%	**Black**	39.9%	59.9%	66.5%	**Black**	62.9%	79.3%	77.6%
White	27.8%	21.6%	13.6%	**White**	57.7%	36.5%	31.3%	**White**	35.1%	18.1%	20.6%
Hispanic	1.5%	1.3%	1.3%	**Hispanic**	0.4%	0.7%	0.9%	**Hispanic**	1.3%	1.2%	1.1%
Asian/Pacific Islander	0.1%	0.3%	0.2%	**Asian/Pacific Islander**	0.2%	0.5%	0.8%	**Asian/Pacific Islander**	0.1%	0.4%	0.4%
Other	0.2%	0.2%	0.1%	**Other**	1.7%	2.5%	0.5%	**Other**	0.6%	1.0%	0.3%

Public Housing: All Households				Housing Choice Vouchers: All Households				All Households (PH + HCV)			
	2001	2010	2015		2001	2010	2015		2001	2010	2015
Black	88.5%	88.7%	89.3%	**Black**	64.6%	77.6%	79.4%	**Black**	78.3%	82.5%	83.5%
White	10.8%	9.4%	9.2%	**White**	27.3%	20.9%	19.0%	**White**	17.8%	15.8%	14.9%
Hispanic	0.5%	1.4%	1.2%	**Hispanic**	0.2%	0.8%	0.9%	**Hispanic**	0.4%	1.1%	1.0%
Asian/Pacific Islander	0.1%	0.2%	0.2%	**Asian/Pacific Islander**	0.1%	0.2%	0.4%	**Asian/Pacific Islander**	0.1%	0.2%	0.3%
Other	0.2%	0.3%	0.1%	**Other**	7.7%	0.4%	0.3%	**Other**	3.4%	0.3%	0.2%

Source: HACP MTW Annual Reports (2007, 2010, 2015)

Public Housing Program:

- As discussed earlier, many local public housing developments have undergone redevelopment in recent decades. As a result, far fewer residents in aggregate were served by this program in 2015 as compared to 2001. This was the case for both Black and white residents whether in family-based or senior-based housing.
- However, the loss rate for senior-based public units has been slower than that of family-based units. While 1,242 fewer Black family households were served in 2015 than in 2001 (34.2% decline), only 18 fewer Black senior households were served (1.8% decline)

Housing Choice Voucher Program:

- Unlike the Public Housing program, the number of Housing Choice Voucher recipients grew considerably from 2001 to 2015, which may reflect the absorption of some former public housing residents. Most of this increase was driven by Black households, while fewer white households became participants overall.
- Racial disparities grew throughout the HCV program. Among family-based units, the number of Black households served rose by 1,370 (58.6% increase), while the number of white households fell slightly by 21 (3.6% decline).
- Among senior-based units, the number of Black households rose by 319 (a 174.3% increase) while the number of white households fell by 29 (10.9% decline).

Both Programs Combined

- The proportion of Black households served by both of these programs increased by about 6.0% while that of white households fell by 16.8%. This represents an increase of 429 Black households and a decrease of 273 white households.

- The number of Black households in family-based units grew incrementally by 128 households, or 2.1%, likely buoyed by an increase in the number of vouchers utilized.
- The number of Black households in senior-based units grew even faster: 301 households, or 25.3%.

Throughout the 2010s, Pittsburgh's Black population fell by approximately 10,500 people, or 13.4% of its total. While Pittsburgh's non-Hispanic white population also fell, by over 11,000 people, it did so at a much lower rate of 5.6%. Simultaneously, a considerable number of municipalities surrounding Pittsburgh experienced sharp increases in their Black populations, some by over 100%.[26] Without this exodus of Black residents, the city may have seen positive population growth. Further research is needed to discern whether there is a correlation between HACP's decision-making and broader population trends in Pittsburgh.

The HACP does not provide demographic data for tenants specifically living in PBV units. While HUD has made efforts to make some of that data more available, such as through its AFFH Tool, the totals presented for the Pittsburgh region include surrounding communities and do not meet the needs of this research. While not directly comparable, the National Low Income Housing Coalition released an analysis of *nationwide* tenant demographics for federally assisted housing, including PBVs.[27]

Figure 9

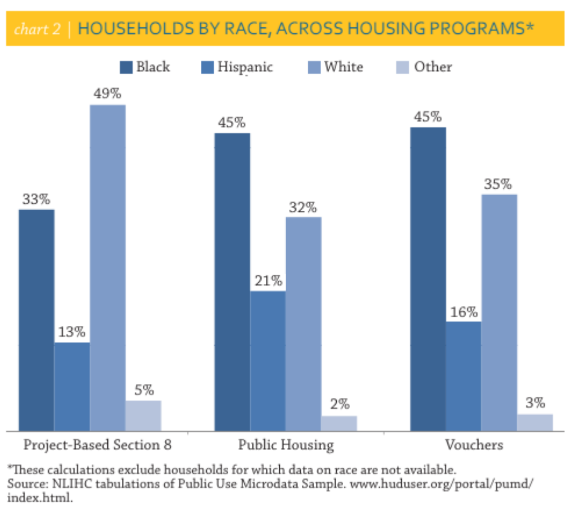
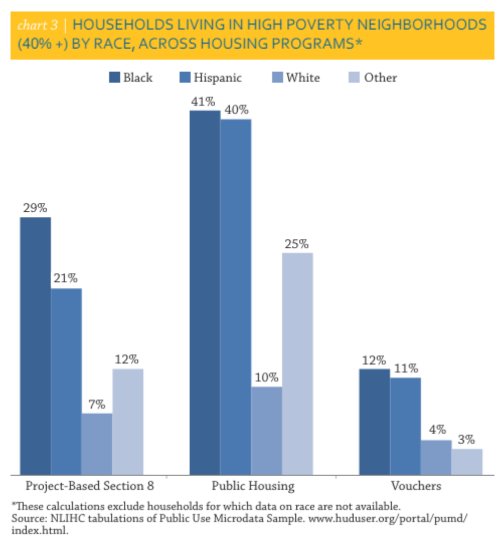


Figure 10



Source: National Low Income Housing Coalition (2012)

Based on their analysis, PBV units tend to have a lower share of Black residents (33%) than public housing or Housing Choice Voucher units (both 45%). Conversely, PBV units have a higher share of white residents (49%) than the latter two programs (32% and 35%, respectively).

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[26] Ryan Deto, "Where is Pittsburgh's population growth occurring and who is driving it?" *Pittsburgh City Paper*, August 25, 2021. https://www.pghcitypaper.com/news/where-is-pittsburghs-population-growth-occurring-and-who-is-driving-it-20072229#:~:text=Allegheny%20County's%20Black%20population%20grew,people%20to%20Allegheny%20County's%20suburbs.

[27] National Low Income Housing Coalition, "Housing Spotlight (vol. 2, issue 2)". November 2012. https://nlihc.org/sites/default/files/HousingSpotlight2-2.pdf

While a lower share of both Black and white PBV tenants were living in high-poverty neighborhoods as compared to public housing, a much lower share of Housing Choice Voucher recipients lived in those communities – perhaps indicating its advantage as a tenant-based, portable subsidy.

Unfortunately, a lack of racial demographic data from either the HACP or HUD prevented our researchers from verifying whether these trends are similar in Pittsburgh.

The Black community in Pittsburgh has experienced a long history of displacement, redlining, and residential segregation, the effects of which still persist today. Closely monitoring how housing policy decisions are impacting racial and ethnic minorities should be a top priority for HACP leadership.

As a first step, the HACP should return to the full disclosure of demographic data (to the extent that it exists) in each program, allowing stakeholders to assess how decisions may be benefitting or negatively impacting vulnerable communities.

Option 2: Full Disclosure of Demographic Data for Program Beneficiaries

The HACP should identify and make publicly available the equality and equity outcomes of its activities.

At a minimum, the HACP should return to the full disclosure of household demographics by program (including race, immigration status, disability status, income level, and family- or senior-based household status). This should encompass all traditional and nontraditional activities resulting in housing for residents, including PBVs and alternative units.

Household demographic data is already collected as per HUD reporting forms. For example, HUD-50058 MTW, Family Report collects demographic data as well as household background data such as whether the household was unhoused at admission, formerly unhoused, or was transitioning out of an institutional setting.

We strongly encourage HACP to identify and publicly disclose any impediments to housing choice within its programs as well as propose short and long-term strategies for addressing the identified impediments.

For example, this report's **Chart 6** uses HACP's MTW Annual Plans to quantify that from 2006 to 2022 that HACP's inventory of housing units for family-based households had declined 35.9% whereas units for senior-based households have increased. While both populations require affordable housing, the disparity of the availability of family-based units may necessitate additional data and potentially require direct short-term strategies.

Additionally, this report's **Table 8** uses HACP's MTW Annual Plans to review the racial demographics of households in the HACP's Public Housing and Housing Choice Voucher programs. However, the HACP's MTW Annual Plans ceased providing racial demographic data after 2015. As a result, the available demographic data is aged and does not include PBV households.

Quantifying and publicly reporting the HACP's affordable housing units by household demographics will identify whether low-income households are equally and equitably distributed throughout the various programs available. Potential redress, as needed, is a local modernization and update to the HUD required Affirmatively Fair Housing Marketing Plan (AFHMP) with a goal of ensuring that tenancy applications are made available to potential applicants least likely to apply.

Section 3: Key Takeaways

1. Federal policies in the 1980s and 1990s resulted in sharp cuts to public housing funding and a surging backlog of capital needs for those outdated developments. The HOPE VI program funded the demolition of nearly 100,000 public housing units between 1993 and 2010, including several in Pittsburgh.

2. The Rental Assistance Demonstration (RAD) gave local housing agencies a new vehicle to convert outdated public housing into mixed-income developments, often privately managed. RAD incorporated new tenant protections, aiming to avoid the level of displacement caused by HOPE VI.

3. Since 2001, the number of public housing units managed by the HACP has steadily declined. Despite sporadic increases in the number of vouchers utilized and the recent utilization of project-based vouchers on a wider scale, neither have been enough to offset those losses. In 2022, the Housing Authority served 8,025 households, down from its peak of 10,641 households served in 2007.

4. The HACP created Allies & Ross Management Development Corporation (ARMDC) in 2007. As a nonprofit component of the Authority, it facilitates mixed-finance development by acting as the lender of Gap Financing loans. One result has been a rapid expansion of project-based vouchers (PBVs) in the city, serving 712 households in 2022. PBVs and similar mixed-financed housing tools are likely to gradually replace legacy public housing units over time.

5. Independent audits of the HACP show that from 2014 to 2022, around $313.3 million was transferred from its traditional HUD programs (primarily public housing and Housing Choice Vouchers) and into its development program – as permitted under the Moving to Work Demonstration.

6. Family-based units have been far more impacted by the erosion of public housing units in Pittsburgh than senior-based units. Since 2006, the number of family-based public housing units in the HACP's inventory has fallen by about 35.9% while the number of senior-based units has held steady.

7. Between 2001 and 2015, both of the HACP's traditional programs became increasingly racially concentrated despite fewer households served overall. However, the Authority has moved away from presenting demographic data, making it difficult to assess how these trends have changed over time. Similarly, a lack of demographic data for those housed under privately managed programs, especially Project-Based Vouchers, remains an obstacle for researchers nationwide.

Section 4: HACP's Five Statutory Requirements as a Moving to Work Agency

Under the Moving to Work Demonstration, public housing agencies with a MTW designation must comply with **five contractual requirements**:[28]

1. Ensure 75% of newly assisted families have very low incomes.
2. Establish a reasonable rent policy designed to encourage employment and self-sufficiency.
3. Continue to assist substantially the same total number of eligible low-income families as they would have without the MTW designation.
4. Continue to assist a comparable mix of households by family size.
5. Meet HUD's housing quality standards.

NOTE: HUD remains the sole arbiter as to whether MTW agencies are in compliance with each of the Demonstration's requirements. While our researchers relied on data available in HACP's reports to replicate HUD tests, we recognize that HUD may take other factors in consideration when assessing compliance. For that reason, we do assume or make any conclusions regarding the Authority's MTW compliance.

Requirement #1: Ensure 75% of Newly Assisted Households Are Very Low-Income

MTW agencies are required to ensure that at least 75% of all *new* admissions meet the definition of "very low income" (50% AMI or less) across all programs. Since the HACP's annual MTW Reports do not contain information regarding *new* tenant admissions (only all existing tenants), our researchers requested this info through a Right to Know request. HACP replied with the following:

> "HUD does not formally assess the HACP on MTW requirement #1 (ensuring at least 75% of the families assisted by the Agency under the MTW demonstration program will be very low-income families. Instead, as stated in each MTW Annual Report at least since 2020, HUD will verify compliance with the statutory requirement for MTW public housing units and MTW HCVs through HUD systems (where the HACP uploads resident data to HUD). The HACP is required to report in each MTW Annual Report data for the actual families housed upon admission during the PHA's Plan Year reported in the "Local, Non-Traditional: Tenant-Based, Property-Based, and Homeownership" categories. This can be generally found in Sections II.D.i of each report. All of the HACP's MTW Annual Plans and Reports can be found on HUD's MTW Demonstration website."

[28] HUD Exchange, "MTW Expansion Training." https://www.hudexchange.info/programs/mtw/mtw-expansion-training/statutory-requirements/the-five-mtw-statutory-requirements

This response is consistent with what was reported by the U.S. Government Accountability Office, namely that HUD relies heavily on MTW agencies' self-reporting of data. As a result, our researchers were unable to test compliance with this requirement.

Requirement #2: Establish a Reasonable Rent Policy

MTW agencies must implement a reasonable rent policy designed to encourage employment and self-sufficiency by participating families. HUD encourages this to be completed early in the Demonstration, which the HACP fulfilled in 2008 for public housing tenants and in 2011 for Housing Choice Voucher recipients (see **Table 7**). The Authority refers to this as the Modified Rent Policy.

Under this policy, able-bodied adults in either program not working must either participate in the Family Self-Sufficiency (FSS) program or otherwise pay a minimum monthly tenant payment of $150. Goals included increased rent collections by the Authority and "a changed environment where work by adults is the norm."

Outcomes for public housing tenants and Housing Choice Voucher recipients are shown in **Tables 9 and 10**, respectively.

Table 9

Family Self-Sufficiency (FSS) Program Outcomes for Public Housing Residents				
Measurement	**Benchmark**	**2005 Baseline**	**Outcome (2017)**	**Outcome (2019)**
Total FSS Participants	500	658	375	404
Number of FSS participant families working	300	181	175	245
Percentage of FSS participant families working	65%	28%	46%	61%
Number of participants graduating from FSS	40	n/a	40	45
Number of participants with escrow accounts	251	29	132	176
Measurement	**Benchmark**	**2008 Baseline**	**Outcome (2017)**	**Outcome (2019)**
HACP rent roll	$645,000	$685,682	$706,742	$718,791
HACP rent collection	$665,200	$612,027	$628,787	$723,529
Average rent (all communities)	$225	$199	$257	$263
Number of families working	730	713	508	745
Percentage of families working	30%	22%	51%	29%

Source: HACP MTW Annual Reports (2017, 2019)

Table 10

Family Self-Sufficiency (FSS) Program Outcomes for Housing Choice Voucher Recipients				
Measurement	**Benchmark**	**2010 Baseline**	**Outcome (2017)**	**Outcome (2019)**
Total FSS Participants	250	448	248	159
Number of FSS participant families working	160	248	156	133
Percentage of FSS participant families working	75%	55%	63%	84%
Number of participants graduating from FSS	51	12	29	23
Number of participants with escrow accounts	200	191	163	115

Source: HACP MTW Annual Reports (2017, 2019)

In its 2017 MTW report, the HACP described the results as "generally in line with expected outcomes", pointing to an overall increase in rent collections and employment among all HACP residents. These trends continued despite languishing FSS enrollment. The Authority also acknowledged difficulties obtaining new admissions in the program due to ongoing RAD conversions and removal of units at several major sites.

By the 2020 report, the HACP noted that stricter guidelines for FSS participants, the lack of a policy permitting re-enrollment in FSS, a decrease in new HCV lease-ups, and the start of COVID-19 restrictions were ongoing challenges for the program's enrollment numbers.

In 2020, Jennifer Bert of the University of Pittsburgh GSPIA's Center for Metropolitan Studies presented the results of her evaluation of the FSS program.[29] The study looked at the results of participant interactions from January 2010 through October 2017.

University of Pittsburgh Focus Group Findings on HACP's FSS Program

One component of her initial research consisted of focus group sessions held in 2014 with HACP residents to evaluate the FSS program. The four focus groups included both FSS participants and non-participants in the public housing and Housing Choice Voucher programs. A total of 36 residents were interviewed and questions concerned "their knowledge of the FSS program,

[29] Jennifer Bert, "An Evaluation of the Family Self-Sufficiency Program in Pittsburgh Using Event History Analysis" (Doctoral Dissertation, University of Pittsburgh, 2020). https://d-scholarship.pitt.edu/38138

incentives for and barriers that limit using the program, effectiveness of the Modified Rent policy, and their perceptions and understanding of homeownership."

Importantly, the study notes that "while no effort was made to verify whether focus group participants' comments are an accurate portrayal of HACP efforts, **their comments are grounded in participants' experiences and perceptions**."

When participants were asked to identify the most valuable aspects of FSS, a wide range of answers were given, including job training, confidence and stability, car ownership, credit counseling, rent reduction, and home ownership. FSS participants were also able to clearly identity the purpose of FSS and the Modified Rent Policy: to move residents out of public assistance and into self-sufficiency.

Yet when FSS participants were asked why they participated in the program, a substantial majority instead responded with complaints and concerns. The most common sentiments centered on the limited helpfulness of staff assistance:

- "They didn't do anything for me. They just said, 'do this'. They didn't follow up on anything, give me any appointments for anything. I had my own networking going on for myself."
- "You get transferred to multiple people who will say 'try this program, call that program, call them'. And its's like nobody wants to help."

That group also identified obstacles within the program. Many were confused about whether escrow accounts could be used for back rent if they fall behind. They cited communication barriers with program staff, wanting more consistent notifications, updates on staff turnover, more details on how the program works, and regular reports on escrow account balances. They also noted that job listings were either too infrequent or already out of date by the time they received them, recommending weekly email updates instead.

Residents were then asked what barriers prevented them from obtaining services in the program. A core concern was that rents increased too quickly as their incomes increased but were slow to decrease when they were unemployed. This, combined with the decrease in utility assistance, **"resulted in the loss of their safety net before they truly felt self-sufficient, resulting in a disincentive for progressing in the FSS program."** One participant was quoted, "So then we quit our jobs. It's like damned if you do, damned if you don't."

Residents in the FSS non-participant group knew very little about the program or its purpose. Despite this, they were able to correctly identify many of its promoted benefits, including job search help, greater housing options, homeownership, and self-sufficiency. Like their counterparts in the FSS participant groups, these residents echoed the sentiment that the HACP was slow to reduce rent during periods of unemployment.

When FSS participants were asked about escrow accounts, some noted its usefulness, but many more expressed confusion regarding whether money was being set aside, how much, and how to track it. Those who had accounts and were knowledgeable about its details "expressed a desire for more control over the accounts and how they could use the money saved."

On the topic of homeownership, respondents in both the FSS-participating and non-participating groups generally understood the key requirements: a steady job and income, adequate credit ratings, the loan process, a home inspection, and savings to cover a down payment, taxes, and mortgage fees. They could also name local programs that assist first-time homebuyers.

Despite this, most expressed considerable hesitation and identified many of the financial risks associated with homeownership. These included building a large enough emergency fund to cover repairs and emergencies, the prospect of foreclosure, high interest rates, predatory lending practices, and racism in the lending process. One participant was quoted as saying, "I think it's just not that easy to buy a home. It's just not as easy as they make it seem."

Access to transportation was also a prominent concern, limiting the pool of available neighborhoods for those who rely on public transit.

University of Pittsburgh Assessment of HACP's FSS Program

Bert's overall analysis tracked the outcomes of participants as they moved through or dropped out of the FSS program. She summarizes her findings as the following:

> "**This study finds that the FSS program at HACP does not lead to self-sufficiency among its participants.** There is a low enrollment rate and a very high rate of attrition, indicating that there is a disconnection between the program offered by HACP and the needs of its residents. Over the course of the seven-year study period, there were 1,058 public housing households enrolled in the FSS program. Of those 1,058 participants, only 191, or 18.1%, completed 60 months in the program and 99, or 9.0%, became program graduates. The rate of completion among the HCV households was even lower. There were 671 HCV households that enrolled in the FSS program during the study period, and of those households, only 72, or 11%, completed 60 months in the FSS program. For HCV households, only 103, or 15.0%, graduated from the FSS program."

The low rate of enrollment and high rate of attrition are largely attributable to weak incentives and a program structure that does not mirror the actual experiences of residents. Most were willing to accept the increase in rent but relatively few participated in the program, and even fewer graduated.

Households with escrow savings accounts – a primary incentive for participation – were more likely to remain in the FSS program than those without one. An important caveat is that the balance on these accounts can only grow if there is an increase in the participant's earnings. This was often not the case:

> "What is distressing is the high number of public housing and housing choice voucher households that did not experience an increase in escrow savings, which indicates that they did not have an increase in income or escrow savings during their time in the program... Also distressing is the high number of HCV households that experienced multiple periods of employment and unemployment, **suggesting that the linear trajectory of the FSS program, which was built upon the theory of change model, is not reflective of the experience of low-income households that are trying to obtain and retain employment**. For the households in this category, supportive services to help participants to keep jobs that they have may be as beneficial as the services to help them to obtain their first job.

Attrition was not concentrated at any one notable point in the program but was instead gradual. For this reason, Bert speculated that this "may reflect dissatisfied and discouraged participants. An FSS program that offers financial incentives to reward smaller achievements may give participants the incentive and encouragement they need to remain in the program."

Nor are these findings exclusive to the HACP: "The FSS program is central to [housing] efforts, yet the program is not effective. Numerous studies have indicated that the FSS program works for very few residents, yet the program remains largely unchanged".

Bert ends by recommending that HUD take the lead on evaluating which components an effective FSS program should include.

Requirement #3: Assist Substantially the Same Number of Families

To establish whether an MTW agency is serving "substantially the same" (STS) number of households as it would have without the demonstration, HUD first creates a baseline for the agency. This is based on how many Public Housing units were occupied and how many Housing Choice Vouchers were utilized in the month preceding execution of the Standard MTW Agreement. The baseline is then adjusted annually to account for allowable changes. For example, demolished public housing units are subtracted from the baseline.

HUD issues a compliance determination by dividing the number of families served in a given year by the baseline. The resulting percentage determines which of the following ratings the agency is assigned:

- Compliant: agency meets or exceeds its adjusted baseline (i.e., 100% or greater)
- Compliant – No Fault of PHA: agency falls below 100% through no fault of its own
- Substantially Compliant – Nominal Dip: agency falls between 95% and 100% of the adjusted baseline
- Substantially Compliant – Plan in Place: agency falls under 95% of the baseline and HUD has required it to submit a "Baseline Plan" that will result in a percentage at or above 100%
- Not Compliant: agency has not taken corrective actions included in Baseline Plan. Sustained noncompliance is considered a breach of the Standard MTW agreement and may result in revocation of the MTW designation.

Through a Right to Know request, our researchers received the results of HACP's most recent STS assessment.

Figure 11

Housing Authority of the City of Pittsburgh (PA001)	Agreement Year BASELINE Novmeber 2000	FY2001	FY2002	FY2003	FY2014	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	FY2021	FY2022
Families Served through MTW Public Housing	5,246	4,844	4,925	4,821	3,904	3,747	3,719	3,580	3,205	3,008	2,959	2,882	2,848
Families Served through MTW Vouchers	3,899	4,363	4,528	5,077	5,245	5,269	5,307	5,546	5,405	5,182	5,088	5,043	5,251
Other Families Served through MTW	0	0	0	0	760	771	779	794	22	27	134	81	151
NUMERATOR - Families Served Total	**9,145**	**9,207**	**9,453**	**9,898**	**9,909**	**9,787**	**9,805**	**9,920**	**8,632**	**8,217**	**8,181**	**8,006**	**8,250**
Baseline Number of Families (Public Housing)	5,246	5,246	5,246	5,246	5,091	5,091	5,037	4,802	4,800	4,303	4,323	4,323	4,293
Incremental Increase to Baseline	0	0	0	0	0	0	0	0	0	20	0	0	0
Incremental Decrease to Baseline	0	0	0	0	0	-54	-235	-2	-497	0	0	-30	0
Baseline Number of Families (Vouchers)	3,899	3,899	3,899	3,899	4,498	4,539	4,539	4,539	4,645	4,645	4,645	4,675	4,679
Incremental Increase to Baseline	0	0	0	0	41	0	0	106	0	0	30	4	30
Incremental Decrease to Baseline	0	0	0	0	0	0	0	0	0	0	0	0	0
DENOMINATOR - Baseline Total	**9,145**	**9,145**	**9,145**	**9,145**	**9,630**	**9,576**	**9,341**	**9,445**	**8,948**	**8,968**	**8,998**	**8,972**	**9,002**
% TOTAL	**100%**	**101%**	**103%**	**108%**	**103%**	**102%**	**105%**	**105%**	**96%**	**92%**	**91%**	**89%**	**92%**
Compliance Determination	**N/A**	**N/A**	**N/A**	**N/A**	**C**	**C**	**C**	**C**	**SC-ND**	**SC-PIP**	**SC-PIP**	**SC-PIP**	**SC-PIP**

Source: HACP Right-to-Know Request

Beginning in 2018, HACP fell under 100% of its adjusted baseline and received a "Substantially Compliant – Nominal Dip" designation. From 2019 to 2021, it fell even further before increasing somewhat in 2022. For those years, HACP received a "Substantially Compliant – Plan in Place" designation from HUD.

In the most recently available year, the HACP's baseline total – representing the minimum threshold of families it must continue to assist – was 9,002 despite the Authority serving 8,250 families.

Requirement #4: Maintain a Comparable Mix of Families

HUD requires that MTW agencies maintain a "comparable mix" of households as they would have without having received a MTW designation. HUD establishes the baseline for each family size (ranging from 1-person to 5+ people). Each year, the MTW agency must ensure that no category has a deviation of more than 10% from its baseline.

Figure 12

Example

In this example, the percentages change by no more than one percentage point. However, because the baseline percentage is small, that one percentage point change results in a 50 percent deviation – five times the allowable deviation – for 6+ person households. This MTW agency would need to develop a plan to increase the number of 6+ member families to bring the mix back into compliance, or provide a clear explanation of the reason for the deviation.

Because the 1-person family size changed by exactly 10 percent, it is still within the acceptable level of deviation.

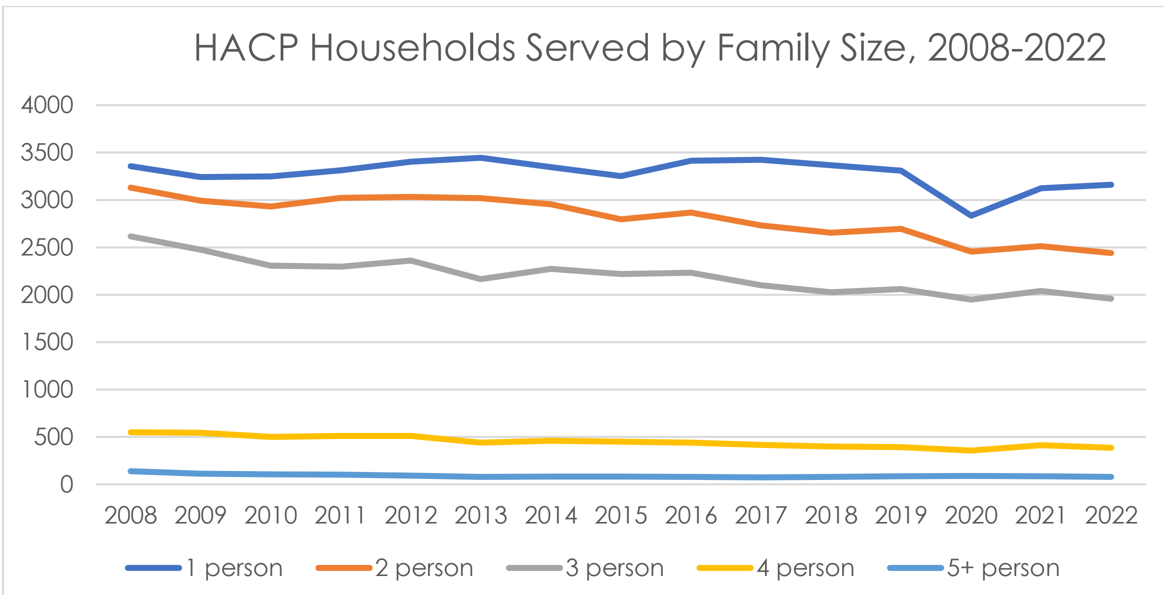
Family Size	Baseline	Comparison Year	Deviation
1 person	10%	11%	-10%
2 person	30%	30%	0%
3 person	27%	26%	4%
4 person	28%	29%	-4%
5 person	3%	3%	0%
6+ person	2%	1%	50%
Totals	**100%**	**100%**	

Source: HUD Exchange MTW Expansion Training, Requirement #4

An important note is that HUD's methodology considers the *percentage total* of each category as the baseline, not the raw totals of households served. This gives MTW agencies flexibility, for example, to reduce the number of public housing units as long as the overall family size mix is maintained. HUD's example for calculating these values is shown above.

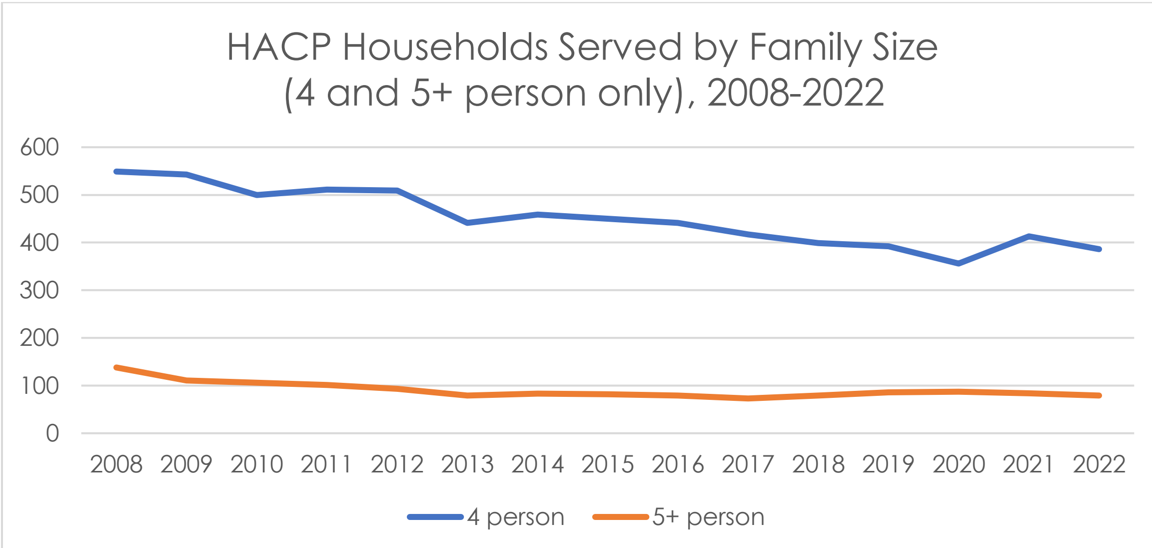
Shown in **Charts 7 and 8** are the total number of occupied Public Housing units plus utilized Housing Choice Vouchers since 2008, separated by unit family size. In the second chart, only totals for 4 and 5+ person households are shown. The HACP served fewer households in all five categories, but 5+ person households have seen the biggest drop in total number of units since 2008, falling by 42.8%.

Chart 7



Source: HACP MTW Annual Reports (2007-2023)

Chart 8



Source: HACP MTW Annual Reports (2007-2023)

HUD says the following about its verification approach to the comparable mix requirement: "In order to establish a comparable mix baseline, HUD will pull data, by family size, for occupied public housing units and leased vouchers at the time of entry into the demonstration... HUD deems an acceptable level of variation to be no more than 10 percent from the baseline. Justifications or explanations for fluctuations greater than 10 percent are required and subject to HUD's review."[30]

As of its 2017 MTW Report, the HACP noted that (unlike the STS assessments) it had not requested any adjustments to the baseline for the mix of families served, though its total baseline had increased to 9,563.

Figure 13

BASELINE MIX OF FAMILY SIZES SERVED (upon entry to MTW)

FAMILY SIZE	OCCUPIED PUBLIC HOUSING UNITS	UTILIZED HCVs	NON-MTW ADJUSTMENTS*	BASELINE MIX NUMBER	BASELINE MIX PERCENTAGE
1 Person	1,714	994	0	2,708	29.61%
2 Person	1,721	1,536	0	3,257	35.62%
3 Person	1,427	1,134	0	2,561	28.00%
4 Person	300	208	0	508	5.55%
5 Person	84	27	0	111	1.21%
6+ Person	N/A	N/A	0	N/A	0%
TOTAL	5,246	3,899	0	9,145	100%

Source: HACP 2020 MTW Annual Report

30 U.S. Department of Housing and Urban Development, "Moving to Work Operations Notice." September 10, 2020. https://www.hud.gov/sites/dfiles/PIH/documents/FinalMTWExOpsNoticePartVIWeb.pdf

In its 2021 MTW Annual Report, the HACP reported using the same baseline mix it did upon initial entry into the Moving to Work Demonstration. Using these figures, our researchers established a lower boundary and upper boundary for each family size, calculated as a 10% deviation lower and higher than the initial baseline *percentage* for that family size.

Figure 9 shows the raw totals of family sizes housed by the HACP since 2008, as found in the MTW Annual Reports. **Figure 10** shows the proportion of each family size category relative to the total. Categories with a deviation over 10% from the baseline are highlighted in green; categories with a deviation under 10% from the baseline are highlighted in red.

Chart 9

HACP Comparable Mix of Family Sizes, 2008-2022 as Compared to MTW Entry Year (Total Households)																
Family Size	Entry Yr. 2001 (Baseline)	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
1	2708	3358	3241	3249	3313	3404	3445	3347	3252	3415	3423	3366	3308	2834	3122	3162
2	3257	3130	2992	2932	3022	3033	3018	2954	2795	2867	2732	2653	2696	2454	2512	2440
3	2561	2616	2474	2305	2297	2362	2164	2273	2220	2231	2099	2025	2059	1949	2041	1958
4	508	549	543	500	511	509	441	459	450	441	417	399	392	356	413	386
5+	111	138	111	106	101	93	79	83	82	79	73	79	86	87	84	79
Total	**9,145**	**9,791**	**9,361**	**9,092**	**9,244**	**9,401**	**9,147**	**9,116**	**8,799**	**9,033**	**8,744**	**8,522**	**8,541**	**7,680**	**8,172**	**8,025**

Source: HACP MTW Annual Reports (2007-2023)

Chart 10

HACP Comparable Mix of Family Sizes, 2008-2022 as Compared to MTW Entry Year (Percentage Mix)																		
Family Size	Entry Yr. 2001 (Baseline)	Lower Boundary (-10%)	Upper Boundary (+10%)	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
1	29.6%	26.6%	32.6%	34.3%	34.6%	35.7%	35.8%	36.2%	37.7%	36.7%	37.0%	37.8%	39.1%	39.5%	38.7%	36.9%	38.2%	39.4%
2	35.6%	32.1%	39.2%	32.0%	32.0%	32.2%	32.7%	32.3%	33.0%	32.4%	31.8%	31.7%	31.2%	31.1%	31.6%	32.0%	30.7%	30.4%
3	28.0%	25.2%	30.8%	26.7%	26.4%	25.4%	24.8%	25.1%	23.7%	24.9%	25.2%	24.7%	24.0%	23.8%	24.1%	25.4%	25.0%	24.4%
4	5.6%	5.0%	6.1%	5.6%	5.8%	5.5%	5.5%	5.4%	4.8%	5.0%	5.1%	4.9%	4.8%	4.7%	4.6%	4.6%	5.1%	4.8%
5+	1.2%	1.1%	1.3%	1.4%	1.2%	1.2%	1.1%	1.0%	0.9%	0.9%	0.9%	0.9%	0.8%	0.9%	1.0%	1.1%	1.0%	1.0%

Source: HACP MTW Annual Reports (2007-2023)

Immediately visible is a trend toward serving smaller one-person households while disproportionately losing larger family-sized households. As examined earlier, the HACP's housing stock has largely preserved senior-based Public Housing (mostly serving one-person households) while family-based public housing units have been increasingly taken offline. This may explain some of the trends found here.

Requirement #5: Meet HUD's Housing Quality Standards

MTW agencies must ensure that all housing assisted under the MTW demonstration meets HUD's housing quality standards, or HQS. Until recently, HUD's Real Estate Assessment Center (REAC) required inspections to use the Uniform Physical Condition Standards (UPCS), "an inspection protocol developed by HUD to evaluate if its residents live in decent, safe and sanitary housing."

HUD has been in the process of transitioning to a new system, the National Standards for the Physical Inspection of Real Estate (NSPIRE). Most public housing programs were mandated to comply with NSPIRE by October 1, 2023, though the compliance date for other programs (including Housing Choice Vouchers and Project Based Vouchers) remains delayed until October 2025.[31] Publicly available HUD datasets only included UPCS/REAC scores, and they will remain the focus in this section, but more information on the new requirements can be found on HUD's NSPIRE homepage.[32]

UPCS uses a scale of 1 to 100, with 100 representing a perfect score. Those scores also determine when the next inspection should occur. Properties scoring 90-100 can be inspected every three years, those scoring 80-89 can be inspected every two years, and those with a 79 or below must be inspected every year. Any score below 60 may constitute a violation under the tenant's HAP Contract and requires remedial action by the affected PHA.

In addition, the score is accompanied by a letter and/or asterisk (*), which represent the following:

- A: No health and safety deficiencies noted
- B: Non-threatening health and safety deficiencies noted
- C: At least one life threatening health and safety deficiency noted
- *: At least one inoperable smoke detector noted

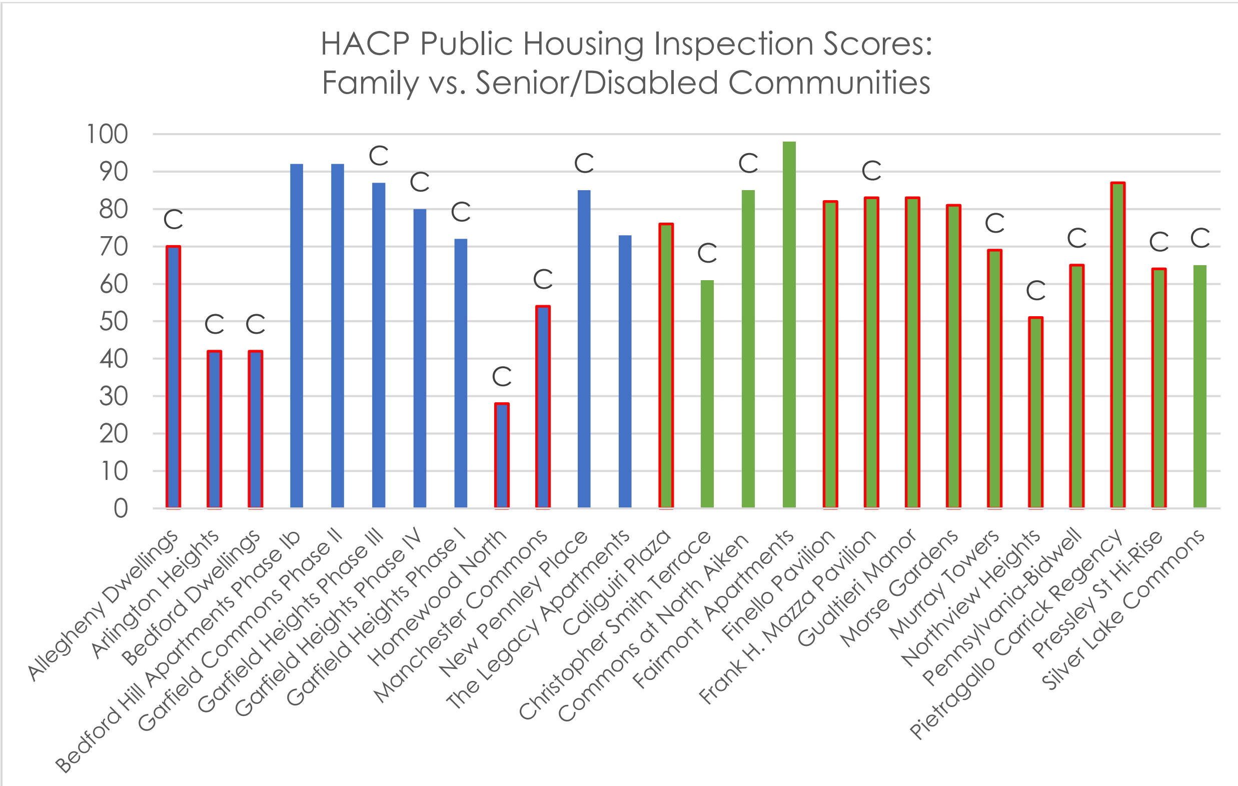
Using HUD's most recently available physical inspection scores for public housing, **Chart 11** below shows developments for which data was available and the most recent score it received.[33] Those on the left side and shaded in blue are family-based communities; those on the right side and shaded in green are senior and disability living communities. Those outlined in red are managed by the HACP, while all others are privately managed. Those shown with a "c" were found to have at least one life threatening health and safety deficiency.

[31] U.S. Department of Housing and Urban Development, Notice, "Implementation of National Standards for the Physical Inspection of Real Estate (NSPIRE)." *Federal Register 89, no. 129* (July 5, 2024): 55645. https://www.govinfo.gov/content/pkg/FR-2024-07-05/pdf/2024-14718.pdf

[32] U.S. Department of Housing and Urban Development, "National Standards for the Physical Inspection of Real Estate (NSPIRE)." https://www.hud.gov/program_offices/public_indian_housing/reac/nspire

[33] U.S. Department of Housing and Urban Development Office of Policy Development and Research, "Physical Inspection Scores." https://www.huduser.gov/portal/datasets/pis.html

Chart 11



Source: HUD Public Housing Physical Inspection Scores

On average, senior/disability communities had a numeric score of 75.0 compared to 68.1 for family communities. Privately managed properties had an average of 80.9 compared to 65.1 for those managed by the HACP. This is not surprising given the old age of certain developments held by HACP, some of which were first constructed in the 1940s. In contrast, privately managed developments have been the result of relatively recent redevelopment efforts with modern health and safety requirements.

Interestingly, when comparing only public housing properties managed by the HACP, there is a relative disparity between the scores of family-based communities and senior/disability-based communities. On average, the latter category scored nearly 27 points higher: HACP's family communities scored 47.2 and its senior/disability communities scored 74.1.

Using the same HUD datasets, **Table 11** below shows only those public housing developments where at least *two* inspection scores, at least one year apart, were included. The first group of inspections took place between 2017-2020, while the comparison group's took place in 2022-2023. Of the 23 sites examined, 12 (52.2%) saw an improved numerical score with an average increase of 14 points. Nine of the sites (39.1%) experienced a drop in their scores with an average decline of around 13 points. Two sites (8.7%) saw no changes to their scores.

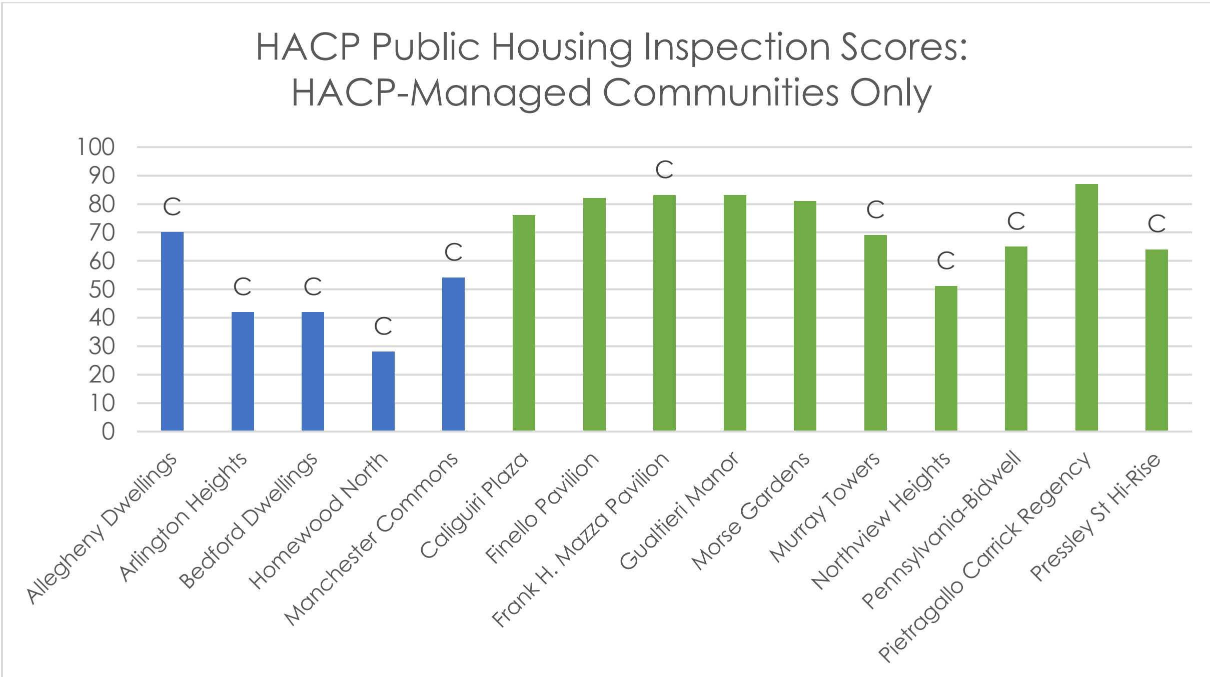
However, the number of sites with an accompanying "a" score (meaning no life-threatening violations were found) fell from two to one, while those with a "c' score (at least one life-threatening violation) increased from 11 to 14. Total sites with an inoperable smoke detector fell from 11 to four.

Table 11

Comparison of HACP Public Housing Property Scores Over Time						
Development Name	**Council District**	**Inspection Date (1)**	**Inspection Score (1)**	**Inspection Date (2)**	**Inspection Score (2)**	**Change in Numerical Score**
Caliguiri Plaza	3	3/6/2020	97b	3/21/2023	76b	-21
Finello Pavilion	3	2/18/2020	57b	3/7/2023	82b	25
Morse Gardens	3	3/5/2020	84c	3/22/2023	81b	-3
Frank H. Mazza Pavilion	4	1/26/2018	96b	3/6/2023	83c	-13
Gualtieri Manor	4	2/13/2019	93b	3/6/2023	83b*	-10
Pietragallo Regency	4	2/27/2020	77c*	3/23/2023	87b	10
Murray Towers	5	3/27/2019	80b	3/9/2023	69c*	-11
Allegheny Dwellings	6	3/2/2020	60c*	6/9/2023	70c	10
Bedford Hill Apartments Phase 1b	6	2/27/2020	78c	3/15/2023	92b	14
Christopher Smith	6	2/11/2020	60b*	12/8/2022	61c	1
Pennsylvania-Bidwell	6	3/5/2020	48c*	3/20/2023	65c	17
Pressley Street	6	3/28/2019	58c	3/8/2023	64c	6
The Legacy Apartments	6	3/6/2020	73b*	3/22/2023	73b	0
Fairmont Apartments	9	2/11/2020	93b	12/22/2022	98a	5
Garfield Commons Phase 2	9	2/24/2017	92c*	12/21/2022	92b	0
Garfield Heights Phase 3	9	2/28/2020	85b	4/6/2023	87c	2
Garfield Heights Phase 4	9	3/25/2019	91c*	4/6/2023	80c*	-11
Garfield Heights Phase 1	9	2/13/2020	52c*	9/19/2022	72c*	20
New Pennley Place	9	3/29/2019	88a*	2/21/2023	85c	-3
North Aiken Apartments	9	5/14/2018	97b	2/23/2023	85c	-12
Silver Lake Commons	9	5/14/2018	97a	2/22/2023	65c	-32
Scattered Sites North	Varies	2/25/2020	35c*	6/5/2023	75c	40
Scattered Sites South	Varies	4/8/2019	53c*	6/7/2023	71b	18

Source: HUD Public Housing Physical Inspection Scores

Chart 12



Source: HUD Public Housing Physical Inspection Scores

Again, some of this may be attributable to property age, as a number of those senior facilities have been built in the past two decades. Still, this reflects concerns that the HACP has not adequately prioritized the maintenance of legacy public housing properties.

Local Reporting on Housing Conditions and Inspection Scores

In October 2021, the *Pittsburgh Post-Gazette* published its investigation into the deteriorating and unsafe conditions throughout the HACP's largest properties.[34] At Bedford Dwellings, Homewood North, Northview Heights, and Arlington Heights, similar problems were documented and well known to its residents: leaking pipes, pervasive mold, broken appliances, plumbing issues, and rodents. In its review of "hundreds of pages of records" including facilities' inspection scores dating back to 2001, reporters found the following:

> "In just three years, more than half the developments owned and managed by the authority have failed inspections at a time when the vast majority of facilities across the nation have passed... In at least a third of the cases, the local buildings have failed multiple times during the past three years"

The HACP, in response, conducted an investigation into the conditions reported and presented its findings.[35] The Authority visited the units cited in the *Post-Gazette* investigation and presented

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[34] Ashley Murray, Joel Jacobs, "Housing Misery: Pittsburgh public housing plagued by crumbling buildings, failed inspections." *Pittsburgh Post-Gazette*, October 3, 2021. https://newsinteractive.post-gazette.com/crumbling-complexes-homewood-arlington-northview-heights-public-housing

[35] Housing Authority of the City of Pittsburgh, "Findings of HACP's investigation into housing conditions." October 15, 2021. https://hacp.org/app/uploads/2021/10/HACP-Summary-Findings-10.15.21.pdf

photographic evidence showing that most of the issues described had been remediated. Among the statements made by the HACP:

- "Photographs taken by the PG do not reflect the actual date the pictures were taken (this information is not known to us) only the date they were published. When the HACP visited the sites after the pictures were published, the majority of the maintenance issues depicted in the photographs had already been resolved."
- "The HACP conducts annual, HUD-required Uniform Physical Conditions Standards (UPCS) inspections on 100% of the Low Income Public Housing (LIPH) properties. The HACP also performs annual Housekeeping Inspections. Follow-up housekeeping inspections are based on a referral or observance of the condition by management."
- "Based on the scoring criteria from REAC, the HACP is not 'failing' in the work order response time. In all categories in FY 2019, 2020 and FY 2021, the HACP scored a 'C' or higher. The majority of the failing scores were for building exteriors (56%) and site (41%). The units achieved a passing score: (69%)."

Further, the Authority indicated that it's the age of legacy public housing stock driving lower scores, presenting its redevelopment strategy as a solution:

- "Unfortunately, many of the HACP sites are antiquated, older housing stock (1940s & 1950s). The repeated 'failed inspections' for the sites and building exteriors are reminiscent of the situation that has plagued many Housing Authorities with LIPH units in metropolitan urban areas."
- "The HACP is continuing to reposition the LIPH Housing Stock and seek sources of funding to replace obsolete and older housing structures."

As future improvements, the HACP promised that it would:

- Prepare an Action Plan to encompass more effective inspection and maintenance protocols.
- Provide residents with written feedback pertaining to open work orders.
- Conduct a customer service survey pertaining to maintenance.
- Require all HACP Site Managers and Asset Staff to participate in National Standards for Physical Inspections in Real Estate (NSPIRE) training, the new HUD inspection protocol.

While legacy public housing units carry a disproportionate burden of unmet capital needs, housing communities under private management are not immune from similar service issues.

In April 2019, PublicSource outlined the problems faced by residents of Glen Hazel Family Community, HACP's first RAD conversion project, which transferred the facilities' management to New York-based Arco Management.[36] Residents described a lack of clarity about when they would need to move and conflicting answers to basic questions, while some were erroneously told they owed unpaid rent. Though the HACP subsequently addressed concerns raised, problems seem to have persisted. In a budget hearing with HACP officials on November 26, 2024, Councilmember Warwick noted that Glen Hazel residents had persistently dealt with issues regarding the boiler, plumbing, and elevators (and mentioning similar but less extreme issues at Murray Towers).

[36] Tom Lisi, "Has Pittsburgh's public housing authority alleviated the concerns of Glen Hazel residents?" *PublicSource*, May 16, 2019. https://www.publicsource.org/has-pittsburghs-public-housing-authority-alleviated-the-concerns-of-glen-hazel-residents

Based on HUD's physical inspection scores, Glen Hazel Heights and Bernie Crawley High Rise received an inspection score of **57c*** on September 2, 2021. A subsequent inspection on October 11, 2022 resulted in a score of **84c*** -- a notable improvement in the numerical score, though still indicating at least one life-threatening violation and at least one inoperable smoke detector. A full table of HUD's recent physical inspection scores for multifamily assisted housing can be found in the **Appendix**.

In the HACP's budget hearing with City Council on November 27, 2014, the Authority's Executive Director noted that the appropriate balance between vouchers and new developments remains an open debate, encouraging ongoing discussions with the community. Councilmembers also noted a desire from residents in certain properties to form tenant councils, but those efforts are often hampered by HUD's regulatory procedures.

The affordable housing landscape changes quickly; a community-wide survey (or recurring surveys) could assess HACP residents' feelings on topics, ensuring the community has a voice in important strategic decisions throughout the repositioning process.

Option 3: Survey and Engage HACP Stakeholders

In an effort to quantify the most common issues faced by its stakeholders, the HACP should conduct community-wide surveys and release the results to the public. These surveys should be tailored to address specific stakeholder groups (e.g., public housing resident, voucher holder, waitlist applicant, housing provider/landlord) and could measure their satisfaction with the HACP's various services, current redevelopment strategy, and gauge interest in tenant councils at each property. The results should be used to guide decisions in a way that is consistent with community needs and desires.

Section 4: Key Takeaways

1. The Authority confirmed that HUD does not provide a formal assessment of Requirement #1 (“ensure at least 75% of newly assisted households are very low-income") but instead relies on their self-reported data. This mirrors the US GAO’s finding in their 2020 report on the MTW Demonstration: HUD lacks the resources and staff needed to conduct vigorous testing of MTW agencies’ performance and relies heavily on agencies’ own data.

2. The HACP fulfilled Requirement #2 of the MTW Demonstration (“establish a reasonable rent policy designed to encourage self-sufficiency") in 2008 by requiring a minimum monthly tenant payment of $150 for those not participating in the Family Self-Sufficiency (FSS) program. A quantitative and qualitative study of FSS by University of Pittsburgh researchers found that participants were largely dissatisfied with the assistance received and that enrollment experienced heavy attrition over time.

3. HUD monitors requirement #3 (“assist substantially the same number of families”) more closely. The Authority’s most recent HUD assessment showed they fell below 100% of their baseline from 2018 through at least 2022. As a result, its “Compliant” designation was replaced with a “Substantially Compliant – Plan In Place” designation. In 2022, the HACP served 8,250 families despite having a baseline minimum of 9,002 families.

4. Unlike for requirement #3, the HACP noted in its 2017 MTW Report that it had not requested any adjustments from HUD to its initial baseline for requirement #4 (“maintain a comparable mix of families”, by household size). If this is the case, our analysis found that the HACP has fallen below the 10% allowable deviation in all family sizes served except one-person households, where it has exceeded the deviation. This may be partially attributable to the Authority’s efforts to preserve senior-based public housing while family-based units continue to come offline.

5. Requirement #5 (“meet housing quality standards”) has traditionally been assessed using HUD’s UPCS building inspection scores on a scale of 1 to 100. These scores reveal several disparities: HACP-managed communities scored nearly 16 points lower than privately managed communities, senior-based communities scored nearly 7 points lower than family-based communities, and HACP-managed family-based communities scored nearly 27 points lower than HACP-managed senior-based communities. HUD is in the process of transitioning to a NSPIRE, a new inspection protocol for assisted housing programs.

Acknowledgments

We thank Megan Confer-Hammond, Executive Director of the Fair Housing Partnership of Greater Pittsburgh, for sharing her wealth of knowledge in affordable housing policy throughout this research process; HUD’s Policy Development and Research division, for assisting with data comprehension; and Michael Horvath, Field Office Director for HUD’s Pittsburgh office, for connecting us with HUD resources.

Appendix

HUD Physical Inspection Scores (Multifamily Assisted Housing Only)							
Property Name	**Council District**	**Inspection Score (1)**	**Release Date (1)**	**Inspection Score (2)**	**Release Date (2)**	**Inspection Score (3)**	**Release Date (3)**
Allegheny Commons East	1	92c*	12/21/2015	98b	3/7/2019	62c*	9/13/2022
Arch Court	1	96b	10/11/2011	95b	9/10/2015	62c	7/12/2022
Century Building	1	49c	9/26/2017	68c*	7/26/2018	85c	9/13/2022
Lynn Williams Apts.	1	98a	12/22/2014	99a	2/21/2018	89b	2/14/2022
May Building	1	92b	7/23/2015	95b	11/30/2018	78b*	3/18/2022
Midtown Towers	1	67c	5/14/2014	89b	6/8/2015	77c	2/23/2022
Northside Coalition	1	97a	5/9/2016	92b	9/27/2019	72b	9/20/2022
Northside Properties	1	90b	1/26/2010	80c	7/22/2015	90a	2/1/2023
Northside Residences I	1	--	--	84c	11/15/2019	72c	10/6/2021
Northside Residences Ii	1	--	--	79c	10/6/2021	87c	3/15/2023
Northside Residences Iii	1	--	--	--	--	91c	4/5/2023
Riverview Manor/Brighton Heights	1	97c*	12/16/2014	92b	12/14/2017	95b	9/27/2022
Sheptytsky Arms	1	99a	5/16/2012	99b	6/24/2015	97b	5/3/2018
St. Ambrose Manor	1	99c	5/22/2015	96c	4/25/2018	98b	3/22/2023
The Roosevelt Building	1	45c*	4/24/2015	69c*	7/28/2016	99b	9/14/2018
Three Rivers Manor	1	89c*	2/1/2016	92c*	9/17/2018	81c*	2/3/2022
West Park Court	1	89b	10/25/2016	87c*	12/18/2018	82c*	3/23/2023
Crafton Heights Townhomes A/K/A Mountainview Apts	2	98a*	2/7/2014	92b*	10/2/2018	73b*	3/30/2022
Elliott Heights	2	88b	12/13/2013	98b	1/29/2016	98b	5/23/2019
Greenway Park Apts	2	87b	6/21/2017	83c*	10/3/2019	91c*	4/13/2022
Hillsboro Plaza	2	75c	5/23/2013	90c*	7/11/2014	90b*	2/2/2018
Just-Inn Transition	2	61c*	7/24/2018	40c*	10/4/2019	57c	2/25/2020
Noble Towers	2	98b	5/13/2008	84b	5/14/2013	99c*	6/23/2015
St Justin Plaza	2	88c	8/25/2016	99a	11/16/2018	98a*	2/28/2023

Sweetbriar Place	2	95b	5/9/2016	98c	5/7/2019	92b	4/7/2022
Bates Street Apts.	3	86c	10/30/2012	95c	11/14/2014	98a	11/15/2017
Bausman Street Ind. Living	3	97b	5/12/2009	96b	1/16/2014	98a	8/23/2017
Carson Square	3	--	--	67b	3/12/2020	99b	11/30/2021
Carson Towers	3	85c	11/16/2012	93b	10/28/2014	96b*	9/18/2018
Parkview Manor	3	77c	4/23/2018	71c	7/22/2019	82c*	2/2/2023
Residences At South High	3	--	--	84c	9/11/2019	84c	3/1/2023
South Hills Retirement Apts.	3	88b	3/21/2016	92b	3/2/2018	84c	3/3/2023
Sylvania Place	3	99a	4/1/2016	73b	8/5/2019	99a	1/25/2022
The Brix At 26	3	--	--	94c	9/14/2015	80c*	9/12/2019
Beechview Manor	4	90c	9/15/2015	99a	12/10/2018	98a	2/27/2023
Creedmoor Court	4	76c	1/6/2014	98b	9/9/2015	84c	7/6/2022
Parkside Manor	4	91b	10/19/2012	94c	11/18/2016	96b	9/26/2022
Darlington Road Apts.	5	--	--	95b	6/17/2015	93b	9/13/2022
Forward-Shady Apts.	5	100b	12/10/2013	93a	11/29/2016	96a	4/12/2022
Glen Hazel Heights & Bernice Crawley	5	--	--	57c*	9/2/2021	84c*	10/11/2022
Greenfield Terrace	5	93b	12/14/2011	97a	9/11/2015	86b	7/19/2022
Hazelwood Towers	5	96c	3/23/2016	99b	4/17/2019	98a	12/19/2022
Munhall Road Apts.	5	98a	10/12/2011	90c	6/17/2015	97b	9/6/2022
Riverview Phase II	5	90c*	6/2/2016	72c	10/22/2021	91b	4/25/2023
Squirrel Hill Aka Krause Commons	5	--	--	--	--	97b	10/7/2021
Allegheny Union Baptist	6	90b	11/9/2012	91c	10/21/2015	96b	7/27/2022
Allegheny Union Plaza	6	91c	2/7/2014	81c*	8/24/2018	96c	4/14/2022
Bedcliff Apts.	6	86c	12/11/2013	93b*	12/29/2015	92c*	1/30/2019
Central Hill	6	99a*	12/8/2014	75c*	12/6/2017	82c*	5/24/2019
Dinwiddie Housing Phase I	6	77c	11/7/2014	87c	11/3/2015	87b	1/17/2018
Dinwiddie Housing Phase Ii	6	94c	11/7/2014	97a	1/18/2018	82b	3/29/2023
Ebenezer Towers	6	86c	6/28/2016	89b	4/30/2018	72c*	3/2/2023
Hill Com I	6	69c*	10/8/2019	70c	8/3/2021	73c*	11/18/2022

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Hill Com II	6	62c	5/8/2018	78c	10/1/2019	64c	12/6/2022
Kelly-Hamilton	6	94a*	4/1/2014	84b*	9/20/2018	76c*	12/13/2022
Oak Hill - Phase 1a	6	--	--	60c*	10/5/2021	92c*	3/11/2023
Oak Hill Phase 1b	6	--	--	--	--	72c	10/8/2021
Oak Hill Phase 1c	6	--	--	--	--	69c*	10/7/2021
Oak Hill Phase 1d	6	--	--	--	--	68c*	10/4/2021
Oak Hill Phase II Wadsworth	6	--	--	--	--	81b*	10/6/2021
Page Place Apts.	6	96a	9/6/2007	95b	1/7/2014	80c	8/21/2017
Perrysville Plaza	6	81c	2/3/2010	90b	4/4/2012	97b	9/15/2022
River Vue Apts.	6	87c	6/5/2017	56c	9/5/2019	75c	4/13/2023
Steelworkers Tower	6	85c	4/30/2010	94b	12/22/2014	92b	12/13/2017
Towne Place Apts.	6	81b	11/21/2016	94a	5/15/2019	83b	2/8/2022
Upper Rooms	6	70c	10/31/2016	88b	2/28/2018	89b	12/13/2021
Warren Plaza Apts.	6	98b	8/5/2016	93a	4/12/2019	90c	12/20/2022
Western Manor	6	46b*	5/15/2019	21c*	8/31/2021	30c*	9/20/2022
Westlake Apts.	6	88b	8/5/2019	68c	8/2/2021	75c*	9/20/2022
William Moorhead Tower	6	97c	9/10/2015	98b	11/16/2018	86c	11/19/2021
I W Abel Place	7	99a	12/11/2014	97b	2/6/2018	90b*	8/4/2021
John Paul Plaza	7	82c	8/16/2017	78c*	9/9/2019	95b	11/4/2022
St. Augustine Plaza	7	94b*	2/22/2018	70b	10/1/2021	83c	4/20/2023
York Commons	7	99b	9/8/2015	98c	10/23/2018	96b	3/16/2023
Bellefield Dwellings	8	93c	9/30/2014	82c	4/23/2018	94c	7/6/2021
Highland Plaza	8	98a	9/21/2016	98c	9/10/2019	88b	10/19/2022
Sherwood Towers	8	92b	9/30/2015	98b	11/13/2018	97b*	11/3/2022
Bennett Place	9	98b	12/11/2014	82b	1/12/2018	71b	3/15/2022
Bethesda Wilkinsburg	9	67c*	10/22/2018	68c*	9/27/2021	82b*	1/28/2023
Bethome	9	93b	6/15/2015	64c*	10/23/2018	78c	11/4/2022
East Liberty Gardens	9	85c*	11/24/2009	85b*	1/9/2013	51c*	6/9/2015
Elhome	9	71c*	11/16/2011	94b	2/10/2014	92b*	12/5/2018

Emory Senior Housing	9	99b	3/7/2016	93c	5/15/2019	83c	7/22/2022
Eva P. Mitchell	9	90a	6/29/2016	96b	5/16/2019	83c*	4/12/2023
Fairfield Apts.	9	87c*	2/27/2012	98b	3/25/2014	98a	6/22/2017
Harriet Tubman Terrace	9	85b	11/22/2016	95c	1/16/2019	83c	4/26/2022
Homewood House	9	94b	9/9/2015	93a	12/4/2018	99a	12/14/2022
Homewood North	9	61c*	5/14/2019	46c*	9/24/2021	60c*	9/22/2022
Independent Hsg Resources East	9	81c*	10/12/2017	80b	3/11/2020	82b	5/4/2022
JULIA JACKSON A/K/A APPLE AVENUE	9	77c	9/4/2018	44c*	9/16/2021	88c*	8/17/2022
Kelly Hamilton Homes Aka Addison Terrace 4	9	--	--	--	--	97b*	4/14/2023
Larimer Phase I	9	--	--	90b	11/16/2017	88c*	11/2/2022
Laurentian Hall	9	97a	8/5/2016	86c	2/28/2020	81b	5/10/2022
Maple Ridge Apartments	9	89c*	9/9/2014	92c	10/4/2016	88b	10/13/2022
Marian Plaza	9	96c*	9/29/2016	80b*	12/5/2019	71b*	2/17/2023
Negley Commons	9	68c	11/4/2016	93b	2/7/2018	98b	4/15/2022
New Pennley Place Phase I	9	92b	7/16/2015	94b	12/29/2018	95b	2/16/2022
Pennley Commons	9	99a	3/2/2016	96a	7/15/2019	82c	10/13/2022
Prestigious Hills (Aka Second East Hills Phase I)	9	82c	4/13/2016	88b*	11/8/2018	45c*	1/21/2022
Second East Hills Phase II	9	85c*	7/11/2017	83c	4/17/2019	81c	3/13/2023
Second East Hills Phase III	9	84c*	7/6/2017	88c*	5/14/2019	80c*	3/14/2023
Third East Hills Park	9	86c*	10/7/2019	61c*	10/13/2021	81c*	4/26/2023

Appendix