

Multifamily Housing Policy Drafting Table for The Section IV: 202 Project Rental Assistance Contract (PRAC) Project

Request for Written Feedback on the Implementation of The Conversion of properties Assisted Under Section 811 through the Rental Assistance Demonstration (RAD)

The Rental Assistance Demonstration (RAD) allows certain HUD-assisted properties to convert to long-term Section 8 contracts under the Project Based Rental Assistance (PBRA) or Project-Based Voucher (PBV) programs. The Consolidated Appropriations Act, 2022 (Pub. L. No. 117-103) authorized the conversion of properties assisted under Section 811(d)(2) of the Cranston-Gonzalez National Affordable Housing Act that provide supportive housing for persons with disabilities.

HUD is revising the RAD Implementation Notice – PIH 2019-23, Housing 2019-09 Rev 4 – (RAD Notice) to implement a conversion option for Section 811 properties. Specifically, Section IV of the RAD Notice, which currently describes the conversion requirements for properties assisted under Section 202 PRACs, will be revised to incorporate necessary programmatic details to apply to converting Section 811 properties.

HUD is seeking public feedback on changes to be made to [Section IV of the current RAD Notice](#) that would guide the conversion of Section 811 properties under RAD. HUD is also seeking feedback on changes that could enhance program requirements governing the conversion of Section 202 PRACs.

Following receipt and consideration of public feedback received, HUD will proceed toward producing a revised version of this section of the RAD Notice.

What feedback are we seeking?

HUD is interested in any general or specific feedback on Section IV of the current RAD notice and how it might be revised to accommodate RAD conversions for Section 811 properties. We encourage respondents to consider and address the following:

- Are there unique features of Section 811 properties that should be accounted for in this Notice?

- Are there provisions applicable to the conversion of Section 202 PRACs that should not be applicable to conversion of Section 811 properties?
- Are there special considerations regarding the treatment of service coordinator funding that HUD should keep in mind?
- The U.S. Supreme Court's *Olmstead v L.C.* decision seeks to promote community living for persons with disabilities. What tools or provisions would be useful for owners of Section 811 properties to further the community living objectives articulated in the *Olmstead* decision?
- What processes, (e.g., joint or pooled applications), should HUD consider to revive units under contract that may not have been occupied due to *Olmstead* limitations?
- What changes should HUD consider to enhance conversion of Section 202 PRACs?

Where can you send feedback?

Please send written feedback via e-mail to rad2@hud.gov with the subject line: “RAD - Section 811 Drafting Table Feedback” no later than 3:00 PM ET, Wednesday, November 23rd. As much as possible, please note page and line numbers to identify the text to which your comments apply.