

Chapter 8

TRANSFER POLICY

INTRODUCTION

This chapter explains the PHA's transfer policy, based on HUD regulations, HUD guidance, and PHA policy decisions.

This chapter describes HUD regulations and PHA policies related to transfers in four parts:

Part I: Emergency Transfers. This part describes emergency transfers and emergency transfer procedures.

Part II: PHA Required Transfers. This part describes types of transfers that may be required by the PHA, including transfers for demolition, disposition, revitalization, and rehabilitation, and notice requirements.

Part III: Transfers Requested by Residents. This part describes types of transfers that may be requested by residents, eligibility requirements, and handling of transfer requests.

Part IV: Transfer Processing. This part describes creating a waiting list, prioritizing transfer requests, the unit offer policy, examples of good cause, payment of transfer costs, de-concentration, rent and reexamination, effective date of transfer, and maintenance charges and security deposits.

The PHA may require the tenant to move from the unit under some circumstances. There are also emergency circumstances under which alternate accommodations for the tenant must be provided, that may or may not require a transfer.

The tenant may also request a transfer, such as a request for a new unit as a reasonable accommodation.

The PHA must have specific policies in place to deal with acceptable transfer requests.

PART I: EMERGENCY TRANSFERS

8-I.A. OVERVIEW

HUD categorizes certain situations that require emergency transfers [PH Occ GB, p. 147]. The emergency transfer differs from a typical transfer in that it requires immediate action by the PHA.

In the case of a genuine emergency, it may be unlikely that the PHA will have the time or resources to immediately transfer a tenant. Due to the immediate need to vacate the unit, placing the tenant on a transfer waiting list would not be appropriate. Under such circumstances, if an appropriate unit is not immediately available, the PHA should find alternate accommodations for the tenant until the emergency passes, or a permanent solution, i.e., return to the unit or transfer to another unit, is possible.

8-I.B. EMERGENCY TRANSFERS

If the dwelling unit is damaged to the extent that conditions are created which are hazardous to life, health, or safety of the occupants, the PHA must offer standard alternative accommodations, if available, where necessary repairs cannot be made within a reasonable time [24 CFR 966.4(h)].

PHA Policy

The following is considered an emergency circumstance warranting an immediate transfer of the tenant or family:

Maintenance conditions in the resident's unit, building or at the site that pose an immediate, verifiable threat to the life, health or safety of the resident or family members that cannot be repaired or abated within 24 hours. Examples of such unit or building conditions would include: a gas leak; no water; toxic contamination; and serious water leaks.

8-I.C. EMERGENCY TRANSFER PROCEDURES

PHA Policy

If the transfer is necessary because of maintenance conditions, and an appropriate unit is not immediately available, the PHA will provide temporary accommodations to the tenant by arranging for temporary lodging at a hotel or similar location. If the conditions that required the transfer cannot be repaired, or the condition cannot be repaired in a reasonable amount of time, the PHA will transfer the resident to the first available and appropriate unit after the temporary relocation.

Emergency transfers are mandatory for the tenant.

PART II: PHA REQUIRED TRANSFERS

8-II.A. OVERVIEW

HUD regulations regarding transfers are minimal, leaving it up to the PHA to develop reasonable transfer policies.

The PHA may require that a resident transfer to another unit under some circumstances. For example, the PHA may require a resident to transfer to make an accessible unit available to a disabled family. The PHA may also transfer a resident in order to maintain occupancy standards based on family composition. Finally, a PHA may transfer residents in order to demolish or renovate the unit.

A transfer that is required by the PHA is an adverse action, and is subject to the notice requirements for adverse actions [24 CFR 966.4(e)(8)(i)].

8-II.B. TYPES OF PHA REQUIRED TRANSFERS

PHA Policy

The types of transfers that may be required by the PHA, include, but are not limited to, transfers to make an accessible unit available for a disabled family, transfers to comply with occupancy standards, transfers for demolition, disposition, revitalization, or rehabilitation, and emergency transfers as discussed in Part I of this chapter.

Transfers required by the PHA are mandatory for the tenant.

Transfers to Make an Accessible Unit Available

When a family is initially given an accessible unit, or the family's unit is rehabilitated to provide accessible features, but the family does not require the accessible features, the PHA may require the family to agree to move to a non-accessible unit when it becomes available [24 CFR 8.27(b)].

PHA Policy

When a non-accessible unit becomes available, or as part of the Relocation Plan prepared under this Section, the PHA will transfer a family living in an accessible unit that does not require the accessible features, to an available unit that is not accessible. The PHA may wait until a disabled resident requires the accessible unit before transferring the family that does not require the accessible features out of the accessible unit.

Occupancy Standards Transfers

The PHA may require a resident to move when a reexamination indicates that there has been a change in family composition, and the family is either overcrowded or over-housed according to PHA policy [24 CFR 960.257(a)(4)]. On some occasions, the PHA may initially place a resident in an inappropriately sized unit at lease-up, where the family is over-housed, to prevent vacancies. The public housing lease must include the tenant's agreement to transfer to an appropriately sized unit based on family composition [24 CFR 966.4(c)(3)].

PHA Policy

The PHA will transfer a family when the family size has changed and the family is now too large (overcrowded) or too small (over-housed) for the unit occupied.

For purposes of the transfer policy, overcrowded and over-housed are defined as follows:

Overcrowded: the number of household members exceeds the maximum number of persons allowed for the unit size in which the family resides, according to the applicable occupancy guidelines.

Over-housed: the family no longer qualifies for the bedroom size in which they are living based on the PHA's occupancy standards as described in the applicable occupancy guidelines.

The PHA may also transfer a family who was initially placed in a unit in which the family was over-housed to a unit of an appropriate size based on the PHA's occupancy standards, when the PHA determines there is a need for the transfer.

The PHA may elect not to transfer an over-housed family in order to prevent vacancies.

A family that is required to move because of family size will be advised by the PHA that a transfer is necessary and that the family has been placed on the transfer list.

Families that request and are granted an exception to the occupancy standards (for either a larger or smaller size unit) in accordance with the applicable exceptions to the occupancy guidelines in Chapter 5 will only be required to transfer if it is necessary to comply with the approved exception.

Demolition, Disposition, Revitalizations, or Rehabilitation Transfers

These transfers permit the PHA to demolish, sell or do major capital or rehabilitation work at a building site [PH Occ GB, page 148].

PHA Policy

It is the policy of the PHA to comply with all federal and state relocation laws and regulations governing displacement and subsequent modifications thereto, including:

- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended;
- Section 104(d) of the Housing and Community Development Act of 1974, as amended;
- Section 18 of the United States Housing Act of 1937, as amended;
- 24 CFR Part 968, Subpart A;
- 24 CFR Part 970;
- 49 CFR Part 24;
- Chapter 111, Hawaii Revised Statutes (HRS); and
- Chapter 17-2017, Hawaii Administrative Rules (HAR), which are incorporated in whole by reference.

The PHA shall ensure that activities undertaken with federal or state funds do not cause unnecessary displacement or relocation. The PHA will administer demolition, disposition, revitalization, and rehabilitation (“rehabilitation”) projects in such a manner that careful consideration is given during the planning phase to avoid displacement. Displacement of any nature shall be reserved as a last resort action necessitated only when no other alternative is available and when the activity is determined necessary in order to carry out a specific goal or objective that is of benefit to the public housing program.

If the displacement is precipitated by federally-assisted activities that require the acquisition (either in whole or in part) or rehabilitation of real property directly by the PHA, all appropriate benefits as required by the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended, or section 104(d) of the Housing and Community Development Act of 1974, shall be provided to the displaced person or persons. If the displacement is precipitated by activities that require the acquisition (either in whole or in part) of real property directly by the PHA, or code enforcement activities, and that are

funded solely by state funds, all appropriate benefits as required by Chapter 111, HRS and Chapter 17-2017, HAR, shall be afforded to the displaced person or persons.

The HPHA will provide housing that is decent, safe, and sanitary on a nondiscriminatory basis for families who are moved permanently from the housing project as a result of the demolition, disposition, revitalization or rehabilitation project as well as for families who are moved temporarily to other units on site or at other projects, or who are provided other housing options, such as accommodation at a hotel.

Relocation Plan

The PHA shall establish a Relocation Plan for each demolition, disposition, revitalization and rehabilitation project it administers. The Relocation Plan shall provide the following information:

- Description of the proposed demolition, disposition, revitalization, or rehabilitation activities;
- Source of funding;
- Who will be relocated or displaced;
- Provisions for advisory services, including but not limited to any required notices and the location of temporary or replacement housing;
- Description of moving assistance to be provided, including a moving cost schedule; and
- Treatment of expenses incidental to the move, including but not limited to utility reconnection fees.

To the extent possible, the PHA will stage rehabilitation of units to allow tenants to remain in the building. The PHA will relocate a family, in accordance with the Relocation Plan, when the unit or site in which the family lives is undergoing major rehabilitation that requires the unit to be vacant, or the unit is being disposed of or demolished. The PHA's Relocation Plan may or may not require transferring affected families to other available public housing units.

In cases of revitalization or rehabilitation, the family may be offered a temporary relocation. Families offered temporary relocation will be allowed to return to the same public housing development upon completion of the rehabilitation project if practicable and if consistent with a Relocation Plan, subject to 24 C.F.R. §968.108, that has been approved by the Office of the Executive Director. Families who do not qualify for a unit at the rehabilitated property upon

completion of the rehabilitation project, due to changes in household composition, occupancy standards, or other criteria set forth in the Occupancy Guidelines (see Chapter 5), may be transferred to public housing units at other properties or may be allowed to remain permanently at their temporary public housing units.

Families who are not offered temporary relocation will be relocated in accordance with the URA and its implementing regulations, as applicable, or in accordance with HRS Chapter 111 and its implementing administrative rules, as applicable.

Relocation Assistance

Eligible families will be afforded relocation assistance in accordance with federal and state law. The PHA will implement procedures to assure the families understand the relocation process, their rights, and their options.

The PHA shall provide all tenants in good standing who are temporarily relocated due to the rehabilitation project, the date and approximate duration of the temporary relocation as well as advisory services regarding their benefits and options. To the extent possible, the PHA will house families who are temporarily relocated in other public housing units. If it is necessary to temporarily house families in units other than public housing, the HPHA will relocate the families to non-public housing units that, upon inspection, are found to be decent, safe, and sanitary. If the HPHA offers a temporary unit and the family elects to stay with relatives or other privately-owned housing, the family will complete the waiver form regarding the condition of housing. The PHA will offer any tenant who has been temporarily relocated for more than one year permanent relocation assistance.

Families who are to be displaced from the housing project will be given a Notice of Eligibility for assistance under the URA or state relocation laws, as applicable. Families who are to be displaced from the housing project and moved to another public housing project will also receive notice stating the final date by which they must be moved, providing an explanation of the moving assistance to be provided, indicating their replacement housing option, and an explanation of the appeals process.

The PHA, at its discretion, may offer assistance with moving expenses to families who move in after the date that would allow them to be eligible for relocation assistance, hereinafter referred to as the “date of initiation of negotiations.” A family’s refusal of a unit offer after the date of initiation of negotiations and upon receipt of notice that they will be ineligible for relocation assistance shall be considered a refusal for good cause. In such cases, the PHA will follow the applicable policies as listed in Chapter 4, Tenant Selection and Assignment Plan.

The PHA will provide families who are temporarily relocated to facilities that lack cooking facilities a per diem to assist with the costs of meals. The PHA, at its

option, may offer a per diem to families who opt to stay with family members for the duration of a temporary relocation period.

Moving Costs

The PHA will cover moving expenses to and from the temporary housing unit for tenants who will be relocated temporarily to another unit and to replacement housing for tenants who will be relocated permanently to another public housing unit or to non-public housing programs such as Section 8. The PHA will use a schedule of moving estimates by unit size based on estimates from local movers to determine the reasonableness of moving expenses.

Families who will be relocated temporarily as part of a federally-assisted demolition, disposition, rehabilitation, or revitalization project must submit their moving cost estimates to the PHA for approval prior to moving and will receive notice that failure to obtain approval prior to paying for packing materials or moving costs may result in the tenant not being reimbursed fully. Such tenants also will receive reimbursement for reasonable out-of-pocket expenses incurred in connection with the temporary relocation, including the cost of moving to and from the temporarily occupied unit and any increase in monthly rent or utility costs at such housing.

The PHA reserves the right to choose the type of moving assistance to be provided to families who will be displaced but are offered the opportunity to relocate to a comparable replacement public housing unit. The PHA will cover moving expenses to the replacement public housing unit for tenants who will be relocated to another public housing unit.

Tenants who require assistance with packing their items may request packing assistance as a reasonable accommodation.

The HPHA will provide direct payment or reimbursement for all disconnection and reconnection fees of necessary utilities, i.e., water, sewer, gas, and electricity. The HPHA also will reimburse disconnection, transfer of service, and reconnection fees for tenants with telephone, cable, or internet services. Where certain utilities require a non-refundable deposit, the HPHA will reimburse the costs of those deposits. New or increased security or utility deposits that are refundable are ineligible for reimbursement; however, the HPHA may consider an advancement of funds under a repayment agreement for hardship cases.

If the newly rehabilitated project changes the utility services from HPHA-furnished utilities to tenant-purchased utilities and new or increased utility deposits will be required, the HPHA cannot pay for the new utilities deposits. These are costs required to be paid by any tenant currently living in a housing project that is being converted to tenant-purchased utilities or by any new tenant moving into such a project.

Appeals Process

Individuals who disagree with the PHA's determination regarding a) whether they qualify for relocation assistance or b) the amount or type of relocation assistance for which they may be eligible may submit a written appeal within 60 days of receiving written notification of the PHA's determination and in accordance with the PHA's grievance procedures. The PHA shall issue a written determination on the appeal and provide the individual a copy. Where the PHA does not grant the individual the full relief requested, the PHA shall notify the individual of his or her right to seek further administrative or judicial review of the PHA decision.

If the relocation plan calls for transferring public housing families to other public housing units, affected families will be placed on the transfer list.

8-II.C. ADVERSE ACTION [24 CFR 966.4(e)(8)(i)]

A PHA required transfer is an adverse action. As an adverse action, the transfer is subject to the requirements regarding notices of adverse actions. If the family requests a grievance hearing within the required timeframe, the PHA may not take action on the transfer until the conclusion of the grievance process.

PART III: TRANSFERS REQUESTED BY TENANTS

8-III.A. OVERVIEW

HUD provides the PHA with discretion to consider transfer requests from tenants. The only requests that the PHA is required to consider are requests for reasonable accommodation. All other transfer requests are at the discretion of the PHA. To avoid administrative costs and burdens, this policy limits the types of requests that will be considered by the PHA.

Some transfers that are requested by tenants should be treated as higher priorities than others due to the more urgent need for the transfer.

8-III.B. TYPES OF RESIDENT REQUESTED TRANSFERS

PHA Policy

The types of requests for transfers that the PHA will consider are limited to requests for transfers due to a threat of physical harm or criminal activity, reasonable accommodation, and transfers to a location closer to employment. No other transfer requests will be considered by the PHA.

The PHA will consider the following as high priority transfer requests, in the following order:

When there has been a verified threat of physical harm or criminal activity. Such circumstances may, at the PHA's discretion, include an assessment by law enforcement indicating that a family member is the actual or potential victim of a criminal attack, retaliation for testimony, a hate crime, or domestic violence, dating violence, sexual assault, or stalking.

When a family requests a transfer as a reasonable accommodation. Examples of a reasonable accommodation transfer include, but are not limited to, a transfer to a first floor unit for a person with mobility impairment, or a transfer to a unit with accessible features

The PHA will consider the following as regular priority transfer requests:

When the head of household or spouse is employed 25 miles or more from the public housing unit, has no reliable transportation, and public transportation is not adequate.

Transfers requested by the tenant are considered optional for the tenant.

8-III.C. ELIGIBILITY FOR TRANSFER

Transferring residents do not have to meet the admission eligibility requirements pertaining to income or preference. However, the PHA may establish other standards for considering a transfer request [PH Occ GB, p. 150].

PHA Policy

Except where reasonable accommodation is being requested, the PHA will only consider transfer requests from residents that meet the following requirements:

- Not within the initial occupancy period of one year (this may be waived for high priority requests)

- Have not engaged in criminal activity that threatens the health and safety of residents and staff

- Owe no back rent or other charges, or have a pattern of late payment

- Have no housekeeping lease violations or history of damaging property

- Can get utilities turned on in the name of the head of household (applicable only to properties with tenant-paid utilities)

- Or any other outstanding violation.

A resident with housekeeping standards violations will not be transferred until the resident passes a follow-up housekeeping inspection.

Exceptions to the good record requirement may be made when it is to the PHA's advantage to make the transfer. Exceptions may also be made when the PHA determines that a transfer is necessary to protect the health or safety of a resident who is a victim of domestic violence, dating violence, or stalking and who provides documentation of abuse in accordance with the PHA's VAWA policy.

If a family requested to be placed on the waiting list for a unit size smaller than designated by the occupancy guidelines, the family will not be eligible to transfer to a larger size unit unless they have a change in family size or composition, or it is needed as a reasonable accommodation.

8-III.D. HANDLING OF REQUESTS

PHA Policy

Residents requesting a transfer to another unit or development will be required to submit a written request for transfer, stating the reason for the transfer. The manager will interview the resident to determine the reason for the request and whether a transfer is justified. If the manager determines that there is a problem at the family's present site, the manager will address the problem and once solved to the manager's satisfaction, the request for transfer will be cancelled. If the manager determines that the transfer is justified, the request will be transmitted to PMMSB for consideration.

In case of a reasonable accommodation transfer, the PHA will encourage the resident to make the request in writing using a reasonable accommodation request form. However, the PHA will consider the transfer request any time the resident indicates that an accommodation is needed whether or not a formal written request is submitted.

The PHA will respond by approving the transfer and putting the family on the transfer list, by denying the transfer, or by requiring more information or documentation from the family, such as documentation of domestic violence, dating violence, or stalking in accordance with the PHA's VAWA policy.

If the family does not meet the eligibility requirements under Section 8-III.C., the manager will address the problem and, until resolved, the request for transfer will be denied.

The PHA will respond within twenty (20) business days of the submission of the family's request, except in the case additional information is required and has not been provided by the family. If the PHA denies the request for transfer, the family will be informed of its grievance rights.

PART IV: TRANSFER PROCESSING

8-IV.A. OVERVIEW

Generally, families who request a transfer should be placed on a transfer list and processed in a consistent and appropriate order. The transfer process must be clearly auditable to ensure that residents do not experience inequitable treatment.

8-IV.B. TRANSFER LIST

PHA Policy

The PHA will maintain a centralized transfer lists for the island of Oahu and separate transfer lists for each Asset Management Project Office on the neighbor islands, and monitor the transfer offers centrally, to ensure that transfers are processed in the correct order and that procedures are uniform across all properties.

Emergency transfers will not automatically go on the transfer list. Instead emergency transfers will be handled immediately, on a case by case basis. If the emergency cannot be resolved by a temporary accommodation, and the resident requires a permanent transfer, the family will be placed at the top of the transfer list.

Transfers will be processed in the following order:

1. Emergency transfers (hazardous maintenance conditions)
2. High-priority transfers: threat of harm or criminal activity
3. High-priority transfers: reasonable accommodation
4. Transfers to make accessible units available
5. Demolition, renovation, etc.
6. Occupancy standards
7. Other PHA-required transfers
8. Other tenant-requested transfers

Within each category, transfers will be processed in order of the date a family was placed on the transfer list, starting with the earliest date.

With the approval of the executive director, the PHA may, on a case-by-case basis, transfer a family without regard to its placement on the transfer list in order to address the immediate need of a family in crisis.

Demolition and renovation transfers will gain the highest priority as necessary to allow the PHA to meet the demolition or renovation schedule.

Emergency transfers, high priority tenant requested transfers, transfers to make accessible units available, and demolition transfers will take precedence over

waiting list admissions, except as otherwise determined by the PHA to meet operational needs and comply with regulatory requirements.

All other transfers will be processed as units become available for transfer offers without adversely affecting the PHA's operational needs.

8-IV.C. TRANSFER OFFER POLICY

PHA Policy

Residents will receive one offer of a transfer.

When the transfer is required by the PHA, the refusal of that offer without good cause will result in lease termination.

When the transfer has been requested by the resident, the refusal of that offer without good cause will result in the removal of the family from the transfer list. In such cases, the family must wait one year to reapply for another transfer.

8-IV.D. GOOD CAUSE FOR UNIT REFUSAL

PHA Policy

Examples of good cause for refusal of a unit offer include, but are not limited to, the following:

The family demonstrates to the PHA's satisfaction that accepting the unit offer will require an adult household member to quit a job, drop out of an educational institution or job training program, or take a child out of day care or an educational program for children with disabilities.

The family demonstrates to the PHA's satisfaction that accepting the offer will place a family member's life, health, or safety in jeopardy. The family should offer specific and compelling documentation such as restraining orders, other court orders, risk assessments related to witness protection from a law enforcement agency, or documentation of domestic violence, dating violence, or stalking in accordance with the PHA's VAWA policy. Reasons offered must be specific to the family. Refusals due to location alone do not qualify for this good cause exemption.

A health professional verifies temporary hospitalization or recovery from illness of the principal household member, other household members (as listed on final application) or live-in aide necessary to the care of the principal household member, except where moving arrangements will be made by the PHA and immediate transfer is required to meet the demolition or renovation schedule.

The unit is inappropriate for the resident's disabilities, except where the unit offered is similar in feature to the current unit and the resident can be placed on the waitlist for a subsequent transfer to a unit meeting the resident's disability-related needs, or the family does not need the

accessible features in the unit offered and does not want to be subject to a 30-day notice to move.

The unit will be demolished, disposed, rehabilitated, or renovated, and the unit offer is made after the date of initiation of negotiations and therefore the family would not be eligible for relocation assistance.

The unit has lead-based paint and the family includes children under the age of six.

The PHA will require documentation of good cause for unit refusals.

8-IV.E. COSTS OF TRANSFERS

The PHA must pay moving expenses to transfer a resident with a disability to an accessible unit as an accommodation for the resident's disability [Notice PIH 2006-13].

PHA Policy

The PHA will bear the reasonable costs of temporarily accommodating the tenant and of long term transfers, if any, due to emergency conditions.

The PHA will bear the reasonable costs of transfers that the PHA requires, except that residents will be required to bear the cost of occupancy standards transfers and transfers to make accessible units available, except as pursuant to a relocation plan for demolition, disposition, revitalization, or rehabilitation. See 8.II.B. Demolition, Disposition, Revitalization, or Rehabilitation Transfers for costs related to these types of transfers.

The resident will bear all of the costs of transfer s/he requests. However, the PHA will bear the reasonable cost of transfers when the transfer is to an accessible unit as a reasonable accommodation.

The reasonable cost of transfers only includes, as applicable, the cost of essential packing supplies, moving, and unloading, and does not include transportation costs or the cost of disconnecting and reconnecting any existing resident-paid services, such as telephone and cable television.

The PHA will establish a moving allowance based on the typical costs in the community of packing, moving, and unloading. To establish typical costs, the PHA will collect information from companies in the community that provide these services.

The PHA will reimburse the family for eligible out-of-pocket moving expenses up to the PHA's established moving allowance. The PHA may opt to either complete the move, or make arrangements and pay for the move, in the event of hardship.

8-IV.F. DECONCENTRATION

PHA Policy

If subject to deconcentration requirements, the PHA will consider its deconcentration goals when transfer units are offered. When feasible, families above the Established Income Range will be offered a unit in a development that is below the Established Income Range, and vice versa, to achieve the PHA's deconcentration goals. A deconcentration offer will be considered a "bonus" offer; that is, if a resident refuses a deconcentration offer, the resident will receive one additional transfer offer.

8-IV.G. RENT AND REEXAMINATION POLICIES FOR TRANSFERS

PHA Policy

A resident will pay the same rent at the new unit as at the old unit during the month of the transfer. If there is a change in utility allowance at the new unit, a new rent will be calculated to take effect on the first day of the next month following the month of the transfer.

Upon placement at the new unit, a supplemental lease will be signed with the new unit information and new rent amount.

The date of transfer does not change the reexamination date, with the exception of transfers to or from the Towers at Kuhio Park, which are handled as new placements.

8-IV.H. EFFECTIVE DATE OF TRANSFER

PHA Policy

Effective date of transfer must not overlap, nor will both projects carry the resident on their books at the same time. The effective date of move-in shall be the next calendar day after the move-out.

8-IV.I. MAINTENANCE CHARGES AND SECURITY DEPOSIT

PHA Policy

Upon taking possession of the new unit, the resident has four calendar days to return the unit and mailbox keys for the old unit to the management office for the old unit. After this time, a \$10 per day lost key fee will be charged in addition to maintenance charges, if any, until all keys are returned to the management office, up to a maximum of \$80.

Resident must also make arrangements with the management office for the old unit for a move-out inspection within 10 days of move.

When a family transfers from one federally assisted public housing unit to another, the PHA will transfer their security deposit to the new unit, with the exception of transfers to or from the Towers at Kuhio Park, which are handled as new placements. The tenant will be billed for any maintenance or others charges due for the “old” unit, including any charges for disposal, cleaning, replacement or repair of broken or missing items, or storage.