

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

PHA Plans

5 Year Plan for Fiscal Years 2000 - 2004
Annual Plan for Fiscal Year 2000

**NOTE: THIS PHA PLANS TEMPLATE (HUD 50075) IS TO BE COMPLETED IN ACCORDANCE WITH
INSTRUCTIONS LOCATED IN APPLICABLE PIH NOTICES**

**PHA Plan
Agency Identification**

PHA Name: Aurora Housing Authority

PHA Number: IL06-PO90

PHA Fiscal Year Beginning: 04/2000

Public Access to Information

**Information regarding any activities outlined in this plan can be obtained by contacting:
(select all that apply)**

- Main administrative office of the PHA
- PHA development management offices
- PHA local offices

Display Locations For PHA Plans and Supporting Documents

The PHA Plans (including attachments) are available for public inspection at: (select all that apply)

- Main administrative office of the PHA
- PHA development management offices
- PHA local offices
- Main administrative office of the local government
- Main administrative office of the County government
- Main administrative office of the State government
- Public library
- PHA website
- Other (list below)

PHA Plan Supporting Documents are available for inspection at: (select all that apply)

- Main business office of the PHA
- PHA development management offices
- Other (list below)

5-YEAR PLAN
PHA FISCAL YEARS 2000 - 2004
[24 CFR Part 903.5]

A. Mission

State the PHA's mission for serving the needs of low-income, very low income, and extremely low-income families in the PHA's jurisdiction. (select one of the choices below)

_____ The mission of the PHA is the same as that of the Department of Housing and Urban Development: To promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.

X The PHA's mission is: (state mission here)

Aurora Housing Authority
Mission Statement

It is the mission of the Aurora Housing Authority to promote the original philosophy of public housing as a temporary helping hand by providing housing assistance to those in need with understanding, respect and professionalism without discrimination.

The primary focus of our mission is to provide and maintain quality, affordable housing within a safe, stable environment while promoting educational, employment, economic development and self sufficiency programs and initiatives for the residents we serve to enhance their lives and improve opportunities for upward mobility and independent lifestyles.

B. Goals

The goals and objectives listed below are derived from HUD's strategic Goals and Objectives and those emphasized in recent legislation. PHAs may select any of these goals and objectives as their own, or identify other goals and/or objectives. Whether selecting the HUD-suggested objectives or their own, **PHAS ARE STRONGLY ENCOURAGED TO IDENTIFY QUANTIFIABLE MEASURES OF SUCCESS IN REACHING THEIR OBJECTIVES OVER THE COURSE OF THE 5 YEARS.** (Quantifiable measures would include targets such as: numbers of families served or PHAS scores achieved.) PHAs should identify

HUD Strategic Goal: Increase the availability of decent, safe, and affordable housing.

PHA Goal: Expand the supply of assisted housing

Objectives:

Apply for additional rental vouchers:

Reduce public housing vacancies:

Leverage private or other public funds to create additional housing opportunities:

Acquire or build units or developments

Other (list below)

PHA Goal: Improve the quality of assisted housing

Objectives:

Improve public housing management: (PHAS score)

Improve voucher management: (SEMAP score)

Increase customer satisfaction:

Concentrate on efforts to improve specific management functions:
(list; e.g., public housing finance; voucher unit inspections)

Renovate or modernize public housing units:

Demolish or dispose of obsolete public housing:

Provide replacement public housing:

Provide replacement vouchers:

Other: (list below)

PHA Goal: Increase assisted housing choices

Objectives:

Provide voucher mobility counseling:

Conduct outreach efforts to potential voucher landlords

Increase voucher payment standards

Implement voucher homeownership program:

Implement public housing or other homeownership programs:

Implement public housing site-based waiting lists:

Convert public housing to vouchers:

Other: (list below)

HUD Strategic Goal: Improve community quality of life and economic vitality

PHA Goal: Provide an improved living environment

Objectives:

- Implement measures to deconcentrate poverty by bringing higher income public housing households into lower income developments:
- Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments:
- Implement public housing security improvements:
- Designate developments or buildings for particular resident groups (elderly, persons with disabilities)
- Other: (list below)

HUD Strategic Goal: Promote self-sufficiency and asset development of families and individuals

- PHA Goal: Promote self-sufficiency and asset development of assisted

Objectives:

- Increase the number and percentage of employed persons in assisted families:
- Attract supportive services to improve assistance recipients' employability:
- Attract supportive services to increase independence for the elderly or families with disabilities.
- Other: (list below)

HUD Strategic Goal: Ensure Equal Opportunity in Housing for all Americans

- PHA Goal: Ensure equal opportunity and affirmatively further fair housing

Objectives:

- Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability:
- Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability:
- Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required:
- Other: (list below)

Other PHA Goals and Objectives: (list below)

Annual PHA Plan
PHA Fiscal Year 2000
[24 CFR Part 903.7]

Annual Plan Type:

Select which type of Annual Plan the PHA will submit.

Standard Plan

Streamlined Plan:

- High Performing PHA**
 Small Agency (<250 Public Housing Units)
 Administering Section 8 Only

Troubled Agency Plan

Executive Summary of the Annual PHA Plan

[24 CFR Part 903.7 9 (r)]

Provide a brief overview of the information in the Annual Plan, including highlights of major initiatives and discretionary policies the PHA has included in the Annual Plan.

EXECUTIVE SUMMARY

The Aurora Housing Authority has prepared this Agency Plan in compliance with Section 511 of the Quality Housing and Work Responsibility Act of 1998 and the ensuing HUD requirements.

We have adopted the following mission statement to guide the activities of the Aurora Housing Authority.

It is the mission of the Aurora Housing Authority to promote the original philosophy of public housing as a temporary helping hand by providing housing assistance to those in need with understanding, respect and professionalism without discrimination.

The primary focus of our mission is to provide and maintain quality, affordable housing within a safe, stable environment while promoting educational, employment, economic development and self sufficiency opportunities for the residents we serve to enhance and improve their lives and provide them with an opportunity to break the cycle of poverty, strive towards upward mobility and independent lifestyles.

We have also adopted the following goals and objectives for the next five years.

Goal one: Manage the Aurora Housing Authority's existing public housing program in an efficient and effective manner in order to best serve our residents and at minimum meet the standard performer criteria established by HUD

Objectives:

1. The Aurora Housing Authority (AHA) will strive to be recognized as a high performer by March 31, 2004.
2. The AHA will make our public housing units more desirable to live in and more marketable to the community in order to maintain a 97% or better adjusted occupancy rate by March 31, 2001.
3. The AHA will foster a professional, motivating and rewarding work environment in order to maintain a capable, well trained and productive team of employees to provide client friendly assistance to our residents and continue the tradition of being a fiscally responsible and innovative leader of affordable housing in both the community and the housing industry.

Goal Two: Provide a safe, secure and stable environment in the AHA's public housing developments.

Objectives:

1. The AHA will continue to address and reduce crime in our developments so residents have a good place to live and raise their families and so the crime rate in our developments is similar to or less than the surrounding neighborhood by March 31, 2004.

2. The AHA will continue our close and longstanding partnership with the Aurora Police Department in order to maintain safe developments and continue reducing crime in and around our public housing developments.
3. The AHA will continue working towards housing better new residents through strict aggressive screening procedures, maintain good residents through firm and consistent lease enforcement and education and improve resident and community perception of the quality and need for public housing by March 31, 2001.

Goal Three: Expand the range and quality of housing choices available to participants in the AHA's tenant based assistance program.

Objectives:

1. The AHA will achieve and sustain a utilization rate of 98% by March 31, 2004.
2. The AHA will work towards attracting fifty new landlords who are interested in participating in the program by March 31, 2004.
3. The AHA will strive to provide more quality housing choices for participants by providing comprehensive information and resources as to available housing opportunities within Aurora and surrounding communities.

Our Annual Plan is based on the premise that if we accomplish our goals and objectives we will be working towards the achievement of our mission and making the AHA a valuable asset to Aurora and the surrounding geographic area..

The plans, statements, budget summary, policies, etc. set forth in the Annual Plan all lead towards the accomplishment of our goals and objectives. Taken as a whole, they outline a comprehensive approach towards our goals and objectives and are consistent with the Consolidated Plan.

In summary, The AHA is on course to improve the condition of public housing and expand available affordable housing opportunities for tenant based assistance programs in Aurora and surrounding communities.

Annual Plan Table of Contents

[24 CFR Part 903.79 (r)]

Provide a table of contents for the Annual Plan, including attachments, and a list of supporting documents available for public inspection.

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Attachments

Indicate which attachments are provided by selecting all that apply. Provide the attachment's name (A, B, etc.) in the space to the left of the name of the attachment. Note: If the attachment is provided as a

SEPARATE file submission from the PHA Plans file, provide the file name in parentheses in the space to the right of the title.

Required Attachments:

- Admissions Policy for Deconcentration
- FY 2000 Capital Fund Program Annual Statement
- Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)

Optional Attachments:

- PHA Management Organizational Chart
- FY 2000 Capital Fund Program 5 Year Action Plan
- Public Housing Drug Elimination Program (PHDEP) Plan
- Comments of Resident Advisory Board or Boards (must be attached if not included in PHA Plan text)
- Other (List below, providing each attachment name)

- 1. Deconcentration Policy**
- 2. AHA Organizational Chart**
- 3. Community Service Policy**
- 4. Public Hearing Comments and Recommendations**
- 5. Additional Resident Advisory Board Recommendations**
- 6. Capital Fund Program Annual Plan**
- 7. FY 2000 Capital Fund Program 5 Year Action Plan**
- 8. Public Housing Drug Elimination Program (PHDEP) Plan**

Supporting Documents Available for Review

Indicate which documents are available for public review by placing a mark in the “Applicable & On Display” column in the appropriate rows. All listed documents must be on display if applicable to the program activities conducted by the PHA.

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
X	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations	5 Year and Annual Plans
X	State/Local Government Certification of Consistency with the Consolidated Plan	5 Year and Annual Plans
X	Fair Housing Documentation: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions’ initiatives to affirmatively further fair housing that require the	5 Year and Annual Plans

Applicable & On Display	Supporting Document	Applicable Plan Component
	PHA's involvement.	
X	Consolidated Plan for the jurisdiction/s in which the PHA is located (which includes the Analysis of Impediments to Fair Housing Choice (AI)) and any additional backup data to support statement of housing needs in the jurisdiction	Annual Plan: Housing Needs
X	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources;
X	Public Housing Admissions and (Continued) Occupancy Policy (A&O), which includes the Tenant Selection and Assignment Plan [TSAP]	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public Housing Deconcentration and Income Mixing Documentation: PHA board certifications of compliance with deconcentration requirements (section 16(a) of the US Housing Act of 1937, as implemented in the 2/18/99 <i>Quality Housing and Work Responsibility Act Initial Guidance; Notice</i> and any further HUD guidance) and 18. Documentation of the required deconcentration and income mixing analysis	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public housing rent determination policies, including the methodology for setting public housing flat rents X check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
	Schedule of flat rents offered at each public housing development check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies X check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
X	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation)	Annual Plan: Operations and Maintenance
X	Public housing grievance procedures X check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
X	Section 8 informal review and hearing procedures X check here if included in Section 8 Administrative	Annual Plan: Grievance Procedures

Applicable & On Display	Supporting Document	Applicable Plan Component
	Plan	
X	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant year	Annual Plan: Capital Needs
	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant	Annual Plan: Capital Needs
X	Most recent, approved 5 Year Action Plan for the Capital Fund/Comprehensive Grant Program, if not included as an attachment (provided at PHA option)	Annual Plan: Capital Needs
	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans or any other approved proposal for development of public housing	Annual Plan: Capital Needs
	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition
	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing
	Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act	Annual Plan: Conversion of Public Housing
	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership
	Policies governing any Section 8 Homeownership program check here if included in the Section 8 Administrative Plan	Annual Plan: Homeownership
	Any cooperative agreement between the PHA and the TANF agency	Annual Plan: Community Service & Self-Sufficiency
X	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports	Annual Plan: Community Service & Self-Sufficiency
X	The most recent Public Housing Drug Elimination Program (PHEDEP) semi-annual performance report for any open grant and most recently submitted PHDEP application (PHDEP Plan)	Annual Plan: Safety and Crime Prevention
X	The most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h)), the results of that audit and the PHA's response to any findings	Annual Plan: Annual Audit
	Troubled PHAs: MOA/Recovery Plan	Troubled PHAs
	Other supporting documents (optional) (list individually; use as many lines as necessary)	(specify as needed)

1. Statement of Housing Needs

[24 CFR Part 903.7 9 (a)]

A. Housing Needs of Families in the Jurisdiction/s Served by the PHA

Based upon the information contained in the Consolidated Plan/s applicable to the jurisdiction, and/or other data available to the PHA, provide a statement of the housing needs in the jurisdiction by completing the following table. In the "Overall" Needs column, provide the estimated number of renter families that have housing needs. For the remaining characteristics, rate the impact of that factor on the housing needs for each family type, from 1 to 5, with 1 being "no impact" and 5 being "severe impact." Use N/A to indicate that no information is available upon which the PHA can make this assessment.

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Affordability	Supply	Quality	Accessibility	Size	Location
Income <= 30% of AMI	600	395	-	2	2	201	-
Income >30% but <=50% of AMI	400	400	-	-	-	-	-
Income >50% but <80% of AMI	0	LOW NEED	-	-	-	-	-
Elderly	401	320	-	80	-	-	-
Families with Disabilities	-	MED. NEED	-	-	-	-	-
Race/Ethnicity	NOT	IN	CONSOLIDATED	PLAN			
Race/Ethnicity							
Race/Ethnicity							
Race/Ethnicity							

What sources of information did the PHA use to conduct this analysis? (Check all that apply; all materials must be made available for public inspection.)

Consolidated Plan of the Jurisdiction/s

Indicate year: 1995-2000

U.S. Census data: the Comprehensive Housing Affordability Strategy ("CHAS") dataset

- ___ American Housing Survey data
Indicate year: ___
- ___ Other housing market study
Indicate year: ___
- ___ Other sources: (list and indicate year of information)

A. Housing Needs of Families on the Public Housing and Section 8 Tenant- Based Assistance Waiting Lists

State the housing needs of the families on the PHA’s waiting list/s. **Complete one table for each type of PHA-wide waiting list administered by the PHA.** PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

Housing Needs of Families on the Waiting List			
Waiting list type: (select one)			
___ Section 8 tenant-based assistance			
X___ Public Housing			
___ Combined Section 8 and Public Housing			
___ Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	627		
Extremely low income <=30% AMI	608		
Very low income (>30% but <=50% AMI)	16		
Low income (>50% but <80% AMI)	3		
Families with children	479		
Elderly families	148		
Families with Disabilities	0		
Race/ethnicity/cauc.	99		
Race/ethnicity/hisp.	77		
Race/ethnicity/black	444		

Race/ethnicity/other	7		

Characteristics by Bedroom Size (Public Housing Only)			
1BR	148		
2 BR	217		
3 BR	201		
4 BR	53		
5 BR	7		
5+ BR	1		

Is the waiting list closed (select one)? **No** Yes
 If yes:
B. How long has it been closed (# of months)?
 Does the PHA expect to reopen the list in the PHA Plan year? No Yes
 Does the PHA permit specific categories of families onto the waiting list, even if generally closed? No Yes

A. Housing Needs of Families on the Public Housing and Section 8 Tenant- Based Assistance Waiting Lists

State the housing needs of the families on the PHA's waiting list/s. **Complete one table for each type of PHA-wide waiting list administered by the PHA.** PHAs may provide separate tables for site-based or sub-jurisdictional public housing waiting lists at their option.

Housing Needs of Families on the Waiting List			
Waiting list type: (select one) <input checked="" type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	200		
Extremely low income <=30% AMI	186		

Very low income (>30% but <=50% AMI)	13		
Low income (>50% but <80% AMI)	1		
Families with children	168		
Elderly families	32		
Families with Disabilities	0		
Race/ethnicity/cauc.	19		
Race/ethnicity/hisp.	13		
Race/ethnicity/black	168		
Race/ethnicity/other	0		
Characteristics by Bedroom Size (Public Housing Only)			
1BR			
2 BR			
3 BR			
4 BR			
5 BR			
5+ BR			
<p>Is the waiting list closed (select one)? No Yes</p> <p>If yes:</p> <p>B. How long has it been closed (# of months)? 6 MONTHS</p> <p>Does the PHA expect to reopen the list in the PHA Plan year? No Yes</p> <p>Does the PHA permit specific categories of families onto the waiting list, even if generally closed? No Yes</p>			

C. Strategy for Addressing Needs

Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list **IN THE UPCOMING YEAR**, and the Agency's reasons for choosing this strategy.

) Strategies

Need: Shortage of affordable housing for all eligible populations

Strategy 1. Maximize the number of affordable units available to the PHA within its current resources by:

Select all that apply

- Employ effective maintenance and management policies to minimize the number of public housing units off-line
- Reduce turnover time for vacated public housing units
- Reduce time to renovate public housing units
- Seek replacement of public housing units lost to the inventory through mixed finance development
- Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources
- Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required
- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies
- Other (list below)

Strategy 2: Increase the number of affordable housing units by:

Select all that apply

- Apply for additional section 8 units should they become available
- Leverage affordable housing resources in the community through the creation of mixed - finance housing
- Pursue housing resources other than public housing or Section 8 tenant-based assistance.
- Other: (list below)

Need: Specific Family Types: Families at or below 30% of median

Strategy 1: Target available assistance to families at or below 30 % of AMI

Select all that apply

- Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing
- Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance
- Employ admissions preferences aimed at families with economic hardships
- Adopt rent policies to support and encourage work
- Other: (list below)

Need: Specific Family Types: Families at or below 50% of median

Strategy 1: Target available assistance to families at or below 50% of AMI

Select all that apply

- Employ admissions preferences aimed at families who are working
- Adopt rent policies to support and encourage work
- Other: (list below)

B. Need: Specific Family Types: The Elderly

Strategy 1: Target available assistance to the elderly:

Select all that apply

- Seek designation of public housing for the elderly
- Apply for special-purpose vouchers targeted to the elderly, should they become

_____ available
_____ Other: (list below)

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

Select all that apply

- _____ Seek designation of public housing for families with disabilities
- _____ Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing
- _____ Apply for special-purpose vouchers targeted to families with disabilities, should they become available
- _____ Affirmatively market to local non-profit agencies that assist families with disabilities
- _____ Other: (list below)

Need: Specific Family Types: Races or ethnicities with disproportionate housing needs

Strategy 1: Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:

Select if applicable

- _____ Affirmatively market to races/ethnicities shown to have disproportionate housing needs
- _____ Other: (list below)

Strategy 2: Conduct activities to affirmatively further fair housing

Select all that apply

- Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- Market the section 8 program to owners outside of areas of poverty /minority

_____ concentrations
 _____ Other: (list below)

Other Housing Needs & Strategies: (list needs and strategies below)

(2) Reasons for Selecting Strategies

Of the factors listed below, select all that influenced the PHA's selection of the strategies it will pursue:

- X___ Funding constraints
- X___ Staffing constraints
- _____ Limited availability of sites for assisted housing
- _____ Extent to which particular housing needs are met by other organizations in the community
- _____ Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA
- _____ Influence of the housing market on PHA programs
- _____ Community priorities regarding housing assistance
- _____ Results of consultation with local or state government
- _____ Results of consultation with residents and the Resident Advisory Board
- _____ Results of consultation with advocacy groups
- X___ Other: (list below)

Recommendations made by the Resident Advisory Board

Statement of Financial Resources

[24 CFR Part 903.79 (b)]

List the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant-based Section 8 assistance programs administered by the PHA during the Plan year. Note: the table assumes that Federal public housing or tenant based Section 8 assistance grant funds are expended on eligible purposes; therefore, uses of these funds need not be stated. For other funds, indicate the use for those funds as one of the following categories: public housing operations, public housing capital improvements, public housing safety/security, public housing

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2000 grants)		
a) Public Housing Operating Fund	1,300,854	
b) Public Housing Capital Fund	1,311,878	

Sources	Planned \$	Planned Uses
c) HOPE VI Revitalization	0	
d) HOPE VI Demolition	0	
e) Annual Contributions for Section 8 Tenant-Based Assistance	4,578,822	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)	144,721	
g) Resident Opportunity and Self-Sufficiency Grants	0	
h) Community Development Block Grant	0	
i) HOME	0	
Other Federal Grants (list below)	0	
2. Prior Year Federal Grants (unobligated funds only) (list below)	0	
3. Public Housing Dwelling Rental Income	832,777	
4. Other income (list below)		
Investments	97,214	
4. Non-federal sources (list below)	0	
Total resources	8,266,266	

3. PHA Policies Governing Eligibility, Selection, and Admissions

[24 CFR Part 903.7 9 (c)]

A. Public Housing

Exemptions: PHAs that do not administer public housing are not required to complete subcomponent 3A.

(1) Eligibility

a. When does the PHA verify eligibility for admission to public housing? (select all that apply)

- When families are within a certain number of being offered a unit: (state number)
 When families are within a certain time of being offered a unit: (state time)
 Other: (describe)

b. Which non-income (screening) factors does the PHA use to establish eligibility for admission to public housing (select all that apply)?

- Criminal or Drug-related activity
 Rental history
 Housekeeping
 Other (describe)

c. Yes No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?

d. Yes No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?

e. Yes No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source)

(2) Waiting List Organization

a. Which methods does the PHA plan to use to organize its public housing waiting list (select all that apply)

- Community-wide list
 Sub-jurisdictional lists
 Site-based waiting lists
 Other (describe)

b. Where may interested persons apply for admission to public housing?

- PHA main administrative office

- PHA development site management office
- Other (list below)

c. If the PHA plans to operate one or more site-based waiting lists in the coming year, answer each of the following questions; if not, skip to subsection **(3) Assignment**

1. How many site-based waiting lists will the PHA operate in the coming year?
2. Yes No: Are any or all of the PHA's site-based waiting lists new for the upcoming year (that is, they are not part of a previously-HUD-approved site based waiting list plan)?
If yes, how many lists?
3. Yes No: May families be on more than one list simultaneously
If yes, how many lists?
4. Where can interested persons obtain more information about and sign up to be on the site-based waiting lists (select all that apply)?
 - PHA main administrative office
 - All PHA development management offices
 - Management offices at developments with site-based waiting lists
 - At the development to which they would like to apply
 - Other (list below)

(3) Assignment

a. How many vacant unit choices are applicants ordinarily given before they fall to the bottom of or are removed from the waiting list? (select one)

- One
- Two
- Three or More

b. Yes No: Is this policy consistent across all waiting list types?

c. If answer to b is no, list variations for any other than the primary public housing waiting list/s for the PHA:

(4) Admissions Preferences

a. Income targeting:

Yes No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 40% of all new admissions to public housing to families at or below 30% of median area income?

b. Transfer policies:

In what circumstances will transfers take precedence over new admissions? (list below)

Emergencies

Overhoused

Underhoused

Medical justification

Administrative reasons determined by the PHA (e.g., to permit modernization work)

Resident choice: (state circumstances below)

Other: (list below)

a. Preferences

X1. Yes No: Has the PHA established preferences for admission to public housing (other than date and time of application)? (If "no" is selected, skip to subsection **(5) Occupancy**)

1. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences:

Involuntary Displacement (Disaster, Government Action, Action of Housing

Owner, Inaccessibility, Property Disposition)

Victims of domestic violence

Substandard housing

Homelessness

High rent burden (rent is > 50 percent of income)

Other preferences: (select below)

Working families and those unable to work because of age or disability

Veterans and veterans' families

Residents who live and/or work or attend school full time in Aurora

Those enrolled currently in educational, training, or upward mobility programs

Households that contribute to meeting income goals (broad range of incomes)

- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below)

3. If the PHA will employ admissions preferences, please prioritize by placing a “1” in the space that represents your first priority, a “2” in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use “1” more than once, “2” more than once, etc.

1 Date and Time

Former Federal preferences:

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans’ families
- Residents who live and/or work in the jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- X Other preference(s) (list below)

Weight 1: Local residency: live, work or attend school full time in Aurora.

Weight 2: High rent burden

Weight 3: Both preferences listed above

4. Relationship of preferences to income targeting requirements:

- The PHA applies preferences within income tiers
- Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

(5) Occupancy

a. What reference materials can applicants and residents use to obtain information about the rules of occupancy of public housing (select all that apply)

- The PHA-resident lease
- The PHA's Admissions and (Continued) Occupancy policy
- PHA briefing seminars or written materials
- Other source (list)

b. How often must residents notify the PHA of changes in family composition? (select all that apply)

- At an annual reexamination and lease renewal
- Any time family composition changes
- At family request for revision
- Other (list)

(6) Deconcentration and Income Mixing

a. Yes No: Did the PHA's analysis of its family (general occupancy) developments to determine concentrations of poverty indicate the need for measures to promote deconcentration of poverty or income mixing?

b. Yes No: Did the PHA adopt any changes to its **admissions policies** based on the results of the required analysis of the need to promote deconcentration of poverty or to assure income mixing?

c. If the answer to b was yes, what changes were adopted? (select all that apply)

- Adoption of site-based waiting lists
- If selected, list targeted developments below:

Employing waiting list "skipping" to achieve deconcentration of poverty or income mixing goals at targeted developments

If selected, list targeted developments below: **ALL DEVELOPMENTS**

____ Employing new admission preferences at targeted developments
If selected, list targeted developments below:

____ Other (list policies and developments targeted below)

d. ____ Yes X No: Did the PHA adopt any changes to **other** policies based on the results of the required analysis of the need for deconcentration of poverty and income mixing?

e. If the answer to d was yes, how would you describe these changes? (select all that apply)

- ____ Additional affirmative marketing
- ____ Actions to improve the marketability of certain developments
- ____ Adoption or adjustment of ceiling rents for certain developments
- ____ Adoption of rent incentives to encourage deconcentration of poverty and income-mixing
- ____ Other (list below)

f. Based on the results of the required analysis, in which developments will the PHA make special efforts to attract or retain higher-income families? (select all that apply)

- ____ Not applicable: results of analysis did not indicate a need for such efforts
- ____ List (any applicable) developments below:

g. Based on the results of the required analysis, in which developments will the PHA make special efforts to assure access for lower-income families? (select all that apply)

- ____ Not applicable: results of analysis did not indicate a need for such efforts
- ____ List (any applicable) developments below:

B. Section 8

Exemptions: PHAs that do not administer section 8 are not required to complete sub-component 3B. **Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

(1) Eligibility

- a. What is the extent of screening conducted by the PHA? (select all that apply)
- Criminal or drug-related activity only to the extent required by law or regulation
- Criminal and drug-related activity, more extensively than required by law or regulation
- More general screening than criminal and drug-related activity (list factors below)
- Other (list below)
- b. Yes No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?
- c. Yes No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?
- d. Yes No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source)
- e. Indicate what kinds of information you share with prospective landlords? (select all that apply)
- Criminal or drug-related activity
- Other (describe below)

(2) Waiting List Organization

- a. With which of the following program waiting lists is the section 8 tenant-based assistance waiting list merged? (select all that apply)
- None
- Federal public housing
- Federal moderate rehabilitation
- Federal project-based certificate program
- Other federal or local program (list below)
- b. Where may interested persons apply for admission to section 8 tenant-based assistance? (select all that apply)
- PHA main administrative office
- Other (list below)

(3) Search Time

- a. Yes No: Does the PHA give extensions on standard 60-day period to search for a unit?

If yes, state circumstances below:

On a case by case basis based on the circumstances, at the discretion of the AHA.

(4) Admissions Preferences

a. Income targeting

___ Yes ___ No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 75% of all new admissions to the section 8 program to families at or below 30% of median area income?

b. Preferences

X1. ___ Yes ___ No: Has the PHA established preferences for admission to section 8 tenant-based assistance? (other than date and time of application) (if no, skip to subcomponent **(5) Special purpose section 8 assistance programs**)

2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences

- ___ Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- ___ Victims of domestic violence
- ___ Substandard housing
- ___ Homelessness
- ___ High rent burden (rent is > 50 percent of income)

Other preferences (select all that apply)

- ___ Working families and those unable to work because of age or disability
- ___ Veterans and veterans' families
- Residents who live, work or attend school full time in Aurora
- ___ Those enrolled currently in educational, training, or upward mobility programs
- ___ Households that contribute to meeting income goals (broad range of incomes)
- ___ Households that contribute to meeting income requirements (targeting)
- ___ Those previously enrolled in educational, training, or upward mobility programs

- Victims of reprisals or hate crimes
- Other preference(s) (list below)

3. If the PHA will employ admissions preferences, please prioritize by placing a “1” in the space that represents your first priority, a “2” in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either through an absolute hierarchy or through a point system), place the same number next to each. That means you can use “1” more than once, “2” more than once, etc.

Date and Time

Former Federal preferences

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans’ families
- Residents who live and/or work in your jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs

- Victims of reprisals or hate crimes
- Other preference(s) (list below)

Weight 1: Local residency: live, work or attend school full time in Aurora.

Weight 2: High rent burden

Weight 3: Both preferences listed above

4. Among applicants on the waiting list with equal preference status, how are applicants selected? (select one)

- Date and time of application
- Drawing (lottery) or other random choice technique

5. If the PHA plans to employ preferences for “residents who live and/or work in the jurisdiction” (select one)

- This preference has previously been reviewed and approved by HUD
 The PHA requests approval for this preference through this PHA Plan

6. Relationship of preferences to income targeting requirements: (select one)

- The PHA applies preferences within income tiers
 Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

(5) Special Purpose Section 8 Assistance Programs

a. In which documents or other reference materials are the policies governing eligibility, selection, and admissions to any special-purpose section 8 program administered by the PHA contained? (select all that apply)

- The Section 8 Administrative Plan
 Briefing sessions and written materials
 Other (list below)

a. How does the PHA announce the availability of any special-purpose section 8 programs to the public?

- Through published notices
 Other (list below)

4. PHA Rent Determination Policies

[24 CFR Part 903.79 (d)]

A. Public Housing

Exemptions: PHAs that do not administer public housing are not required to complete sub-component 4A.

(1) Income Based Rent Policies

Describe the PHA’s income based rent setting policy/ies for public housing using, including discretionary (that is, not required by statute or regulation) income disregards and exclusions, in the appropriate spaces below.

a. Use of discretionary policies: (select one)

The PHA will not employ any discretionary rent-setting policies for income based rent in public housing. Income-based rents are set at the higher of 30% of adjusted monthly income, 10% of unadjusted monthly income, the welfare rent, or minimum rent (less HUD mandatory deductions and exclusions). (If selected, skip to sub-component (2))

---or---

The PHA employs discretionary policies for determining income based rent (If selected, continue to question b.)

b. Minimum Rent

1. What amount best reflects the PHA's minimum rent? (select one)

- \$0
 \$1-\$25
 \$26-\$50

2. Yes No: Has the PHA adopted any discretionary minimum rent hardship exemption policies?

3. If yes to question 2, list these policies below:

13.3 MINIMUM RENT

The AHA has set the minimum rent at **\$25.00**. However if the family requests a hardship exemption, the AHA will immediately suspend the minimum rent for the family until the AHA can determine whether the hardship exists and whether the hardship is of a temporary or long-term nature.

A. A hardship exists in the following circumstances:

1. When the family has lost eligibility for or is waiting for an eligibility determination for a Federal, State, or local assistance program;

2. When the family would be evicted as a result of the imposition of the minimum rent requirement;
 3. When the income of the family has decreased because of changed circumstances, including loss of employment;
 4. When the family has an increase in expenses because of changed circumstances, for medical costs, child care, transportation, education, or similar items;
 5. When a death has occurred in the family.
- B. No hardship. If the AHA determines there is no qualifying hardship, the minimum rent will be reinstated, including requiring back payment of minimum rent for the time of suspension.
- C. Temporary hardship. If the AHA reasonably determines that there is a qualifying hardship but that it is of a temporary nature, the minimum rent will be not be imposed for a period of 90 days from the date of the family's request. At the end of the 90-day period, the minimum rent will be imposed retroactively to the time of suspension. The AHA will offer a repayment agreement in accordance with the Section 19 of this policy for any rent not paid during the period of suspension. During the suspension period the AHA will not evict the family for nonpayment of the amount of tenant rent owed for the suspension period.
- D. Long-term hardship. If the AHA determines there is a long-term hardship, the family will be exempt from the minimum rent requirement until the hardship no longer exists.
- E. Appeals. The family may use the grievance procedure to appeal the AHA's determination regarding the hardship. No escrow deposit will be required in order to access the grievance procedure.
- a. Rents set at less than 30% than adjusted income
1. ___ Yes X No: Does the PHA plan to charge rents at a fixed amount or percentage less than 30% of adjusted income?
 2. If yes to above, list the amounts or percentages charged and the circumstances under which these will be used below:

d. Which of the discretionary (optional) deductions and/or exclusions policies does the PHA plan to employ (select all that apply)

For the earned income of a previously unemployed household member

For increases in earned income

Fixed amount (other than general rent-setting policy)

If yes, state amount/s and circumstances below:

Fixed percentage (other than general rent-setting policy)

If yes, state percentage/s and circumstances below:

For household heads

For other family members

For transportation expenses

For the non-reimbursed medical expenses of non-disabled or non-elderly families

Other (describe below)

e. Ceiling rents

1. Do you have ceiling rents? (rents set at a level lower than 30% of adjusted income) (select one)

Yes for all developments

Yes but only for some developments

No

2. For which kinds of developments are ceiling rents in place? (select all that apply)

For all developments

For all general occupancy developments (not elderly or disabled or elderly only)

For specified general occupancy developments

For certain parts of developments; e.g., the high-rise portion

For certain size units; e.g., larger bedroom sizes

Other (list below)

3. Select the space or spaces that best describe how you arrive at ceiling rents (select all that apply)

- Market comparability study
- Fair market rents (FMR)
- 95th percentile rents
- 75 percent of operating costs
- 100 percent of operating costs for general occupancy (family) developments
- Operating costs plus debt service
- The "rental value" of the unit
- Other (list below)

f. Rent re-determinations:

1. Between income reexaminations, how often must tenants report changes in income or family composition to the PHA such that the changes result in an adjustment to rent? (select all that apply)

- Never
- At family option
- Any time the family experiences an income increase
- Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold) \$100.00 a month (increase or decrease)
- Other (list below)

Residents must report all changes in family composition within 10 days after they occur.

g. Yes No: Does the PHA plan to implement individual savings accounts for residents (ISAs) as an alternative to the required 12 month disallowance of earned income and phasing in of rent increases in the next year?

(2) Flat Rents

1. In setting the market-based flat rents, what sources of information did the PHA use to establish comparability? (select all that apply.)

- The section 8 rent reasonableness study of comparable housing
- Survey of rents listed in local newspaper
- Survey of similar unassisted units in the neighborhood
- Other (list/describe below)
40TH percentile of Fair Market Rents for existing housing established by HUD

15.3 *FLAT RENTS*

The annual letter to flat rent payers regarding the reexamination process will state the following:

- A. Each year at the time of the annual reexamination, the family has the option of selecting a flat rent amount in lieu of completing the reexamination process and having their rent based on the formula amount.
- B. The amount of the flat rent.
- C. A fact sheet about formula rents that explains the types of income counted, the most common types of income excluded, and the categories of allowances that can be deducted from income.
- D. Families who opt for the flat rent will be required to go through the income reexamination process every three years, rather than the annual review they otherwise would undergo.
- E. Families who opt for the flat rent may request to have a reexamination and return to the formula-based method at any time for any of the following reasons:
 - 1. The family's income has decreased.
 - 2. The family's circumstances have changed increasing their expenses for child care, medical care, etc.
 - 3. Other circumstances creating a hardship on the family such that the formula method would be more financially feasible for the family.
- F. The dates upon which the AHA expects to review the amount of the flat rent, the approximate rent increase the family could expect, and the approximate date upon which a future rent increase could become effective.
- G. The name and phone number of an individual to call to get additional information or counseling concerning flat rents.
- H. A certification for the family to sign accepting or declining the flat rent.

Each year prior to their anniversary date, AHA will send a reexamination letter to the

family offering the choice between a flat or a formula rent. The opportunity to select the flat rent is available only at this time. At the appointment, the AHA may assist the family in identifying the rent method that would be most advantageous for the family. If the family wishes to select the flat rent method without meeting with the AHA representative, they may make the selection on the form and return the form to the AHA. In such case, the AHA will cancel the appointment.

Aurora Housing Authority Flat Rent Schedule

The following is the flat rent amount for each bedroom size unit owned by the Aurora Housing Authority (AHA). This flat rent amount is based on the Fair Market Rent Schedule established by HUD for the Chicago Metropolitan area which includes Kane County.

The Flat Rent Schedule will be adjusted annually as necessary based on the update of the HUD Fair Market Rent Schedule. Adjustments in rent are applied on the anniversary date for each affected family.

Flat Rent Schedules are posted at each development and at the central office of the AHA.

Bedroom Sized Unit	Monthly Flat Rent Amount
Studio (0 bedroom)	\$ 533.00
1 bedroom	\$ 640.00
2 bedroom	\$ 762.00
3 bedroom	\$ 953.00
4 bedroom	\$1,066.00
5 bedroom	\$1,225.00
6 bedroom	\$1,385.00

Families who opt for the flat rent may request to have a reexamination and return to the formula based method at any time for any of the following reasons:

1. The family's income has decreased.

2. The family's circumstances have changed increasing their expenses for child care, medical care, etc.

3. Other circumstances creating a hardship on the family such that the formula method would be more financially feasible for the family.

B. Section 8 Tenant-Based Assistance

Exemptions: PHAs that do not administer Section 8 tenant-based assistance are not required to complete sub-component 4B. **Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

1) Payment Standards

Describe the voucher payment standards and policies.

a. What is the PHA's payment standard? (select the category that best describes your standard)

At or above 90% but below 100% of FMR

100% of FMR

Above 100% but at or below 110% of FMR

Above 110% of FMR (if HUD approved; describe circumstances below)

b. If the payment standard is lower than FMR, why has the PHA selected this standard? (select all that apply)

FMRs are adequate to ensure success among assisted families in the PHA's segment of the FMR area

The PHA has chosen to serve additional families by lowering the payment standard

Reflects market or submarket

Other (list below)

c. If the payment standard is higher than FMR, why has the PHA chosen this level? (select all that apply)

FMRs are not adequate to ensure success among assisted families in the PHA's segment of the FMR area

- Reflects market or submarket
- To increase housing options for families
- Other (list below)

d. How often are payment standards reevaluated for adequacy? (select one)

- Annually
- Other (list below)

e. What factors will the PHA consider in its assessment of the adequacy of its payment standard? (select all that apply)

- Success rates of assisted families
- Rent burdens of assisted families
- Other (list below)

(2) Minimum Rent

a. What amount best reflects the PHA's minimum rent? (select one)

- \$0
- \$1-\$25
- \$26-\$50

b. Yes No: Has the PHA adopted any discretionary minimum rent hardship exemption policies? (if yes, list below)

B. Minimum Rent.

The AHA has set the minimum rent as **\$25.00**. However, if the family requests a hardship exemption, the AHA will suspend the minimum rent for the family beginning the month following the family's hardship request. The suspension will continue until the Housing Authority can determine whether hardship exists and whether the hardship is of a temporary or long-term nature. During suspension, the family will not be required to pay a minimum rent and the Housing Assistance Payment will be increased accordingly.

1. A hardship exists in the following circumstances:

- a. When the family has lost eligibility for or is awaiting an eligibility determination for a Federal, State or local assistance program;
 - b. When the family would be evicted as a result of the imposition of the minimum rent requirement;
 - c. When the income of the family has decreased because of changed circumstances, including loss of employment;
 - d. When the family has an increase in expenses because of changed circumstances, for medical costs, child care, transportation, education, or similar items;
 - e. When a death has occurred in the family.
2. No hardship. If the Housing Authority determines there is no qualifying hardship, the minimum rent will be reinstated, including requiring back payment of minimum rent to the Housing Authority for the time of suspension.
 3. Temporary hardship. If the Housing Authority determines that there is a qualifying hardship but that it is of a temporary nature, the minimum rent will not be imposed for a period of 90 days from the date of the family's request. At the end of the 90-day period, the minimum rent will be imposed retroactively to the time of suspension. The Housing Authority will offer a reasonable repayment agreement for any minimum rent back payment paid by the Housing Authority on the family's behalf during the period of suspension.
 4. Long-term hardship. If the Housing Authority determines there is a long-term hardship, the family will be exempt from the minimum rent requirement until the hardship no longer exists.
 5. Appeals. The family may use the informal hearing procedure to appeal the Housing Authority's determination regarding the hardship. No escrow deposit will be required in order to access the informal hearing procedures.

5. Operations and Management

[24 CFR Part 903.7 9 (e)]

Exemptions from Component 5: High performing and small PHAs are not required to complete this section. Section 8 only PHAs must complete parts A, B, and C(2)

A. PHA Management Structure

(select one) Describe the PHA's management structure and organization.

- An organization chart showing the PHA's management structure and organization is attached.
- A brief description of the management structure and organization of the PHA follows:

B. HUD Programs Under PHA Management

_. List Federal programs administered by the PHA, number of families served at the beginning of the upcoming fiscal year, and expected turnover in each. (Use "NA" to indicate that the PHA does not operate any of the programs listed below.)

Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	656	
Section 8 Vouchers	167	
Section 8 Certificates	537	
Section 8 Mod Rehab	50	
Special Purpose Section 8 Certificates/Vouchers (list individually)	N/A	
Public Housing Drug Elimination Program (PHDEP)	460	
Other Federal Programs(list individually)	N/A	

C. Management and Maintenance Policies

List the PHA's public housing management and maintenance policy documents, manuals and handbooks that contain the Agency's rules, standards, and policies that govern maintenance and management of public housing, including a description of any measures necessary for the prevention or eradication of pest infestation (which includes cockroach infestation) and the policies governing Section 8 management.

(1) **Public Housing Maintenance and Management: (list below)**

- Admissions and Continued Occupancy Policy
- Public Housing Lease
- Routine and Preventive Maintenance Policy
- Pest Control Policy (includes cockroach extermination)

(2) **Section 8 Management: (list below)**

- Section 8 Administrative plan
- HAP Contract

6. PHA Grievance Procedures

[24 CFR Part 903.79 (f)]

Exemptions from component 6: High performing PHAs are not required to complete component 6. Section 8-Only PHAs are exempt from sub-component 6A.

A. Public Housing

1. Yes No: Has the PHA established any written grievance procedures in addition to federal requirements found at 24 CFR Part 966, Subpart B, for residents of public housing?

If yes, list additions to federal requirements below:

2. Which PHA office should residents or applicants to public housing contact to initiate the PHA grievance process? (select all that apply)

- PHA main administrative office
- PHA development management offices
- Other (list below)

B. Section 8 Tenant-Based Assistance

1. Yes No: Has the PHA established informal review procedures for applicants to

the Section 8 tenant-based assistance program and informal hearing procedures for families assisted by the Section 8 tenant-based assistance program in addition to federal requirements found at 24 CFR 982?

2. Which PHA office should applicants or assisted families contact to initiate the informal review and informal hearing processes? (select all that apply)

PHA main administrative office

Other (list below)

7. Capital Improvement Needs

[24 CFR Part 903.79 (g)]

Exemptions from Component 7: Section 8 only PHAs are not required to complete this component and may skip to Component 8.

A. Capital Fund Activities

Exemptions from sub-component 7A: PHAs that will not participate in the Capital Fund Program may skip to component 7B. All other PHAs must complete 7A as instructed.

(1) Capital Fund Program Annual Statement

Using parts I, II, and III of the Annual Statement for the Capital Fund Program (CFP), identify capital activities the PHA is proposing for the upcoming year to ensure long-term physical and social viability of its public housing developments. This statement can be completed by using the CFP Annual Statement tables provided in the table library at the end of the PHA Plan template **OR**, at the PHA's option, by completing and attaching a properly updated HUD-52837.

Select one:

—

The Capital Fund Program Annual Statement is provided as an attachment to the PHA Plan at Attachment (state name)

Annual Statement

- Capital Fund Program (CFP) Part I: Summary
- Capital Fund Program (CFP) Part II: Supporting Table
- Capital Fund Program (CFP) Part III: Implementation Schedule

-or-

X The Capital Fund Program Annual Statement is provided below: (if selected, copy the CFP Annual Statement from the Table Library and insert here)

**Component 7
Capital Fund Program Annual Statement
Parts I, II, and III**

**Annual Statement
Capital Fund Program (CFP) Part I: Summary**

Line No.	Summary by Development Account	Total Estimated Cost
1	Total Non-CGP Funds	0
2	1406 Operations	80,000
3	1408 Management Improvements	25,000
4	1410 Administration	131,187
5	1411 Audit	0
6	1415 Liquidated Damages	0
7	1430 Fees and Costs	115,000
8	1440 Site Acquisition	0
9	1450 Site Improvement	30,000
10	1460 Dwelling Structures	820,691
11	1465.1 Dwelling Equipment-Nonexpendable	20,000
12	1470 Nondwelling Structures	0
13	1475 Nondwelling Equipment	40,000
14	1485 Demolition	0
15	1490 Replacement Reserve	0
16	1492 Moving to Work Demonstration	0
17	1495.1 Relocation Costs	50,000
18	1498 Mod Used for Development	0
19	1502 Contingency	0
20	Amount of Annual Grant (Sum of lines 2-19)	1,311,878
21	Amount of line 20 Related to LBP Activities	265,176
22	Amount of line 20 Related to Section 504 Compliance	0
23	Amount of line 20 Related to Security	10,000
24	Amount of line 20 Related to Energy Conservation Measures	500,000

(2) Optional 5-Year Action Plan

Agencies are encouraged to include a 5-Year Action Plan covering capital work items. This statement can be completed by using the 5 Year Action Plan table provided in the table library at the end of the PHA Plan template **OR** by completing and attaching a properly updated HUD-52834.

- c.
- d.
- e. Yes No: Is the PHA providing an optional 5-Year Action Plan for the Capital Fund? (if no, skip to sub-component 7B)

b. If yes to question a, select one:

The Capital Fund Program 5-Year Action Plan is provided as an attachment to the PHA Plan at Attachment (state name **PHA Plan Table Library - Five Year Action Plan Tables (2001 -2005)**)

-or-

The Capital Fund Program 5-Year Action Plan is provided below: (if selected, copy the CFP optional 5 Year Action Plan from the Table Library and insert here)

B. HOPE VI and Public Housing Development and Replacement Activities (Non-Capital Fund)

Applicability of sub-component 7B: All PHAs administering public housing. Identify any approved HOPE VI and/or public housing development or replacement activities not described in the Capital Fund Program Annual Statement.

- Yes No: a) Has the PHA received a HOPE VI revitalization grant? (if no, skip to question c; if yes, provide responses to question b for each grant, copying and completing as many times as necessary)
- b) Status of HOPE VI revitalization grant (complete one set of questions for each grant)

1. Development name:
2. Development (project) number:
3. Status of grant: (select the statement that best describes the current status)

- Revitalization Plan under development
- Revitalization Plan submitted, pending approval
- Revitalization Plan approved
- Activities pursuant to an approved Revitalization Plan underway

- Yes No: c) Does the PHA plan to apply for a HOPE VI Revitalization grant

in the Plan year?
 If yes, list development name/s below:

Yes No: d) Will the PHA be engaging in any mixed-finance development activities for public housing in the Plan year?
 If yes, list developments or activities below:

Yes No: e) Will the PHA be conducting any other public housing development or replacement activities not discussed in the Capital Fund Program Annual Statement?
 If yes, list developments or activities below:

8. Demolition and Disposition

[24 CFR Part 903.7 9 (h)]

Applicability of component 8: Section 8 only PHAs are not required to complete this section.

1. Yes No: Does the PHA plan to conduct any demolition or disposition activities (pursuant to section 18 of the U.S. Housing Act of 1937 (42 U.S.C. 1437p)) in the plan Fiscal Year? (If “No”, skip to component 9; if “yes”, complete one activity description for each development.)

2. Activity Description

Yes No: Has the PHA provided the activities description information in the optional Public Housing Asset Management Table? (If “yes”, skip to component 9. If “No”, complete the Activity Description table below.)

Demolition/Disposition Activity Description
1a. Development name:
1b. Development (project) number:
2. Activity type: <input type="checkbox"/> Demolition <input type="checkbox"/> Disposition
3. Application status (select one)

<input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date application approved, submitted, or planned for submission: <u>(DD/MM/YY)</u>
5. Number of units affected: Coverage of action (select one) <input type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: b. Projected end date of activity:

9. Designation of Public Housing for Occupancy by Elderly Families or Families with Disabilities or Elderly Families and Families with Disabilities

[24 CFR Part 903.7 9 (i)]

Exemptions from Component 9; Section 8 only PHAs are not required to complete this section.

1. Yes No: Has the PHA designated or applied for approval to designate or does the PHA plan to apply to designate any public housing for occupancy only by the elderly families or only by families with disabilities, or by elderly families and families with disabilities or will apply for designation for occupancy by only elderly families or only families with disabilities, or by elderly families and families with disabilities as provided by section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e) in the upcoming fiscal year? (If “No”, skip to component 10. If “yes”, complete one activity description for each development, unless the PHA is eligible to complete a streamlined submission; PHAs completing streamlined submissions may skip to component 10.)

2. Activity Description

Yes No: Has the PHA provided all required activity description information for this component in the optional Public Housing Asset Management Table? If “yes”, skip to component 10. If “No”,

complete the Activity Description table below.

<u>Designation of Public Housing Activity Description</u>
1a. Development name: 1b. Development (project) number:
2. Designation type: <input type="checkbox"/> Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities
3. Application status (select one) <input type="checkbox"/> Approved; included in the PHA's Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date this designation approved, submitted, or planned for submission: (DD/MM/YY)
5. If approved, will this designation constitute a (select one) <input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
1. Number of units affected: 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input type="checkbox"/> Total development

10. Conversion of Public Housing to Tenant-Based Assistance

[24 CFR Part 903.79 (j)]

Exemptions from Component 10; Section 8 only PHAs are not required to complete this section.

A. Assessments of Reasonable Revitalization Pursuant to section 202 of the HUD FY 1996 HUD Appropriations Act

1. Yes No: Have any of the PHA's developments or portions of developments been identified by HUD or the PHA as covered under section 202 of the HUD FY 1996 HUD Appropriations Act? (If "No", skip to component 11; if "yes", complete one activity description for each identified development, unless eligible to complete a streamlined submission. PHAs completing streamlined

submissions may skip to component 11.)

2. Activity Description

___ Yes ___ No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? If “yes”, skip to component 11. If “No”, complete the Activity Description table below.

Conversion of Public Housing Activity Description
1a. Development name: 1b. Development (project) number:
2. What is the status of the required assessment? ___ Assessment underway ___ Assessment results submitted to HUD ___ Assessment results approved by HUD (if marked, proceed to next question) ___ Other (explain below)
3. ___ Yes ___ No: Is a Conversion Plan required? (If yes, go to block 4; if no, go to block 5.)
4. Status of Conversion Plan (select the statement that best describes the current status) ___ Conversion Plan in development ___ Conversion Plan submitted to HUD on: (DD/MM/YYYY) ___ Conversion Plan approved by HUD on: (DD/MM/YYYY) ___ Activities pursuant to HUD-approved Conversion Plan underway
5. Description of how requirements of Section 202 are being satisfied by means other than conversion (select one) ___ Units addressed in a pending or approved demolition application (date submitted or approved: ___ Units addressed in a pending or approved HOPE VI demolition application (date submitted or approved:) ___ Units addressed in a pending or approved HOPE VI Revitalization Plan (date submitted or approved:) ___ Requirements no longer applicable: vacancy rates are less than 10 percent ___ Requirements no longer applicable: site now has less than 300 units ___ Other: (describe below)

B. Reserved for Conversions pursuant to Section 22 of the U.S. Housing Act of 1937

C. Reserved for Conversions pursuant to Section 33 of the U.S. Housing Act of 1937

11. Homeownership Programs Administered by the PHA

[24 CFR Part 903.7 9 (k)]

A. Public Housing

Exemptions from Component 11A: Section 8 only PHAs are not required to complete 11A.

1. ___ Yes X No: Does the PHA administer any homeownership programs administered by the PHA under an approved section 5(h) homeownership program (42 U.S.C. 1437c(h)), or an approved HOPE I program (42 U.S.C. 1437aaa) or has the PHA applied or plan to apply to administer any homeownership programs under section 5(h), the HOPE I program, or section 32 of the U.S. Housing Act of 1937 (42 U.S.C. 1437z-4). (If “No”, skip to component 11B; if “yes”, complete one activity description for each applicable program/plan, unless eligible to complete a streamlined submission due to **small PHA** or **high performing PHA** status. PHAs completing streamlined submissions may skip to component 11B.)

2. Activity Description

___ Yes ___ No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? (If “yes”, skip to component 12. If “No”, complete the Activity Description table below.)

Public Housing Homeownership Activity Description (Complete one for each development affected)	
1a. Development name:	
1b. Development (project) number:	
2. Federal Program authority:	
___ HOPE I	
___ 5(h)	
___ Turnkey III	
___ Section 32 of the USHA of 1937 (effective 10/1/99)	
3. Application status: (select one)	
___ Approved; included in the PHA’s Homeownership Plan/Program	
___ Submitted, pending approval	

<input type="checkbox"/> Planned application
4. Date Homeownership Plan/Program approved, submitted, or planned for submission: (DD/MM/YYYY)
5. Number of units affected:
6. Coverage of action: (select one)
<input type="checkbox"/> Part of the development
<input type="checkbox"/> Total development

B. Section 8 Tenant Based Assistance

1. Yes No: Does the PHA plan to administer a Section 8 Homeownership program pursuant to Section 8(y) of the U.S.H.A. of 1937, as implemented by 24 CFR part 982 ? (If “No”, skip to component 12; if “yes”, describe each program using the table below (copy and complete questions for each program identified), unless the PHA is eligible to complete a streamlined submission due to high performer status. **High performing PHAs** may skip to component 12.)

2. Program Description:

a. Size of Program

Yes No: Will the PHA limit the number of families participating in the section 8 homeownership option?

If the answer to the question above was yes, which statement best describes the number of participants? (select one)

- 25 or fewer participants
- 26 - 50 participants
- 51 to 100 participants
- more than 100 participants

b. PHA-established eligibility criteria

Yes No: Will the PHA’s program have eligibility criteria for participation in its Section 8 Homeownership Option program in addition to HUD criteria? If yes, list criteria below:

12. PHA Community Service and Self-sufficiency Programs

[24 CFR Part 903.7 9 (l)]

Exemptions from Component 12: High performing and small PHAs are not required to complete this component. Section 8-Only PHAs are not required to complete sub-component C.

A. PHA Coordination with the Welfare (TANF) Agency

1. Cooperative agreements:

Yes No: Has the PHA has entered into a cooperative agreement with the TANF Agency, to share information and/or target supportive services (as contemplated by section 12(d)(7) of the Housing Act of 1937)?

If yes, what was the date that agreement was signed? 12/13/99

2. Other coordination efforts between the PHA and TANF agency (select all that apply)

- Client referrals
- Information sharing regarding mutual clients (for rent determinations and otherwise)
- Coordinate the provision of specific social and self-sufficiency services and programs to eligible families
- Jointly administer programs
- Partner to administer a HUD Welfare-to-Work voucher program
- Joint administration of other demonstration program
- Other (describe)

B. Services and programs offered to residents and participants

(1) General

a. Self-Sufficiency Policies

Which, if any of the following discretionary policies will the PHA employ to enhance the economic and social self-sufficiency of assisted families in the following areas? (select all that apply)

- Public housing rent determination policies
- Public housing admissions policies
- Section 8 admissions policies
- Preference in admission to section 8 for certain public housing families
- Preferences for families working or engaging in training or education programs for non-housing programs operated or coordinated by the PHA
- Preference/eligibility for public housing homeownership option participation
- Preference/eligibility for section 8 homeownership option participation
- Other policies (list below)

HUD, does the most recent FSS Action Plan address the steps the PHA plans to take to achieve at least the minimum program size?
If no, list steps the PHA will take below:

C. Welfare Benefit Reductions

1. The PHA is complying with the statutory requirements of section 12(d) of the U.S. Housing Act of 1937 (relating to the treatment of income changes resulting from welfare program requirements) by: (select all that apply)
- Adopting appropriate changes to the PHA's public housing rent determination policies and train staff to carry out those policies
 - Informing residents of new policy on admission and reexamination

 - Actively notifying residents of new policy at times in addition to admission and reexamination.
 - Establishing or pursuing a cooperative agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services
 - Establishing a protocol for exchange of information with all appropriate TANF agencies
 - Other: (list below)

D. Reserved for Community Service Requirement pursuant to section 12(c) of the U.S. Housing Act of 1937

13. PHA Safety and Crime Prevention Measures

[24 CFR Part 903.79 (m)]

Exemptions from Component 13: High performing and small PHAs not participating in PHDEP and Section 8 Only PHAs may skip to component 15. High Performing and small PHAs that are participating in PHDEP and are submitting a PHDEP Plan with this PHA Plan may skip to sub-component D.

A. Need for measures to ensure the safety of public housing residents

1. Describe the need for measures to ensure the safety of public housing residents (select all that apply)
- High incidence of violent and/or drug-related crime in some or all of the PHA's developments
 - High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to the PHA's developments
 - Residents fearful for their safety and/or the safety of their children
 - Observed lower-level crime, vandalism and/or graffiti

- _____ People on waiting list unwilling to move into one or more developments due to perceived and/or actual levels of violent and/or drug-related crime
- _____ Other (describe below)

2. What information or data did the PHA used to determine the need for PHA actions to improve safety of residents (select all that apply).

- _____ Safety and security survey of residents
- _____ Analysis of crime statistics over time for crimes committed “in and around” public housing authority
- _____ Analysis of cost trends over time for repair of vandalism and removal of graffiti
- _____ Resident reports
- _____ PHA employee reports
- _____ Police reports
- _____ Demonstrable, quantifiable success with previous or ongoing anticrime/anti drug programs
- _____ Other (describe below)

3. Which developments are most affected? (list below)

B. Crime and Drug Prevention activities the PHA has undertaken or plans to undertake in the next PHA fiscal year

1. List the crime prevention activities the PHA has undertaken or plans to undertake: (select all that apply)

- _____ Contracting with outside and/or resident organizations for the provision of crime-and/or drug-prevention activities
- _____ Crime Prevention Through Environmental Design
- _____ Activities targeted to at-risk youth, adults, or seniors
- _____ Volunteer Resident Patrol/Block Watchers Program
- _____ Other (describe below)

2. Which developments are most affected? (list below)

C. Coordination between PHA and the police

1. Describe the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities: (select all that apply)

- _____ Police involvement in development, implementation, and/or ongoing evaluation of drug-elimination plan
- _____ Police provide crime data to housing authority staff for analysis and action
- _____ Police have established a physical presence on housing authority property (e.g., community policing office, officer in residence)
- _____ Police regularly testify in and otherwise support eviction cases
- _____ Police regularly meet with the PHA management and residents
- _____ Agreement between PHA and local law enforcement agency for provision of above-baseline law enforcement services
- _____ Other activities (list below)

2. Which developments are most affected? (list below)

D. Additional information as required by PHDEP/PHDEP Plan

PHAs eligible for FY 2000 PHDEP funds must provide a PHDEP Plan meeting specified requirements prior to receipt of PHDEP funds.

- Yes _____ No: Is the PHA eligible to participate in the PHDEP in the fiscal year covered by this PHA Plan?
- Yes _____ No: Has the PHA included the PHDEP Plan for FY 2000 in this PHA Plan?
- _____ Yes _____ No: This PHDEP Plan is an Attachment. (Attachment Filename: _____)

14. RESERVED FOR PET POLICY

20.7 PET POLICY

DEFINITION

For the purpose of these rules, “pet” is defined as a domesticated small animal traditionally kept in the home for pleasure rather than for utility or commercial purposes. Pet is

understood to be limited to: dogs, litter box-trained cats, birds (specifically parakeets, canaries, or finches), small caged rodents (i.e., hamsters, gerbils, guinea pigs), fish and turtles. Exotic animals are not considered “pets”. These rules, in compliance with federal regulations, distinguish cats and dogs from other pets as “fur-bearing” animals. Except where otherwise indicated, these rules apply principally to dogs and cats.

PET RESTRICTIONS

No more than one fur-bearing pet is permitted in an apartment. There may be no more than two birds or small caged animals per apartment. No limit is placed on the number of fish; however, the size of fish tank may not exceed 10 gallons. Guests are not permitted to bring any type of pet onto the premises.

LOCATION OF PETS WITHIN THE BUILDING

Pets shall not be brought into public lobbies, laundry rooms, storage areas, dining areas or other public gathering spaces. When dogs or cats are moved through the building, they must be moved from the resident’s apartment to the outside exit. One elevator will be specified for pet use; pets will be limited to that one elevator.

SIZES

Dogs shall weight no more than 10 pounds at the time of maturity and stand no more than 18 inches at the shoulder. Pets acquired as puppies shall be understood to mature at the height and weight not to exceed these height and weight restrictions. American Kennel Club’s standards shall determine the height and weight after maturity of the breed. A non-documented animal will be assumed to mature to that size which has been determined by veterinarian evidence to the Management in a signed letter.

LICENSURE AND TAGS

Every dog and cat must wear the appropriate local animal license, a valid rabies tag and a tag bearing the owner’s name, address and telephone number. All licenses and tags must be current.

ADMISSION/REGISTRATION

Every dog and cat must be registered with management upon admission and, thereafter, annually on the resident lease expiration and recertification date. Registration of dogs and cats requires proof of current dog or cat licensure, including, but not limited to feline distemper shots. Dogs shall have certifications of appropriate inoculations for heartworm,

parvo and rabies, unless otherwise specified by a veterinarian. A verification letter that a cat or dog has been spayed or neutered is required prior to admission. Proof of liability insurance, evidence of a flea control program and verification of alternate care-takers are also required as discussed below.

Prior to admittance of a pet into the facility, residents will be required to complete the pet registration form and sign the Lease Addendum pertaining to pets. All pets must be registered.

As part of the application the applicant shall acknowledge and agree that Management has the right to refer cases of pet abuse or abandonment to the appropriate Humane Society or other agency and the AHA and its representatives shall be held harmless for such referral made in good faith.

Applicants are encouraged to review and complete the appropriate form for estimating the costs of pet ownership prior to acquiring a pet.

Any change in pet will be treated as a new pet, and the permission procedure must be initiated and approval obtained once again before the new pet is allowed on the property.

ALTERING

All cats must be declawed prior to occupancy. Female dogs and cats over six months must be spayed, and males over eight months must be neutered. Dogs and cats cannot be admitted until they are old enough to be declawed, spayed or neutered.

LIABILITY

Residents owning pets shall be liable for the entire amount of all damages caused by their pet and all cleaning, defleaing and deodorizing required because of such pet. Pet owners shall be strictly liable for the entire amount of any injury to the person or property of other residents, staff or visitors of the Development caused by their pet. (Resident's will hold AHA, owners of the development and its employees harmless and indemnify them from any and all claims arising directly and indirectly from any injury or damage as a result of pet ownership.) Pet owners are encouraged to obtain liability insurance. Pet liability insurance can be obtained through most insurance agents and companies. It can also be included in renter's policies.

PET DEPOSIT

Each dog and cat owner must provide a pet security deposit in the amount of \$200.00 in addition to the standard rental security deposit. This deposit shall be maintained in a separate account as provided for by state law and HUD regulations for the maintenance of

security deposits. The amount of pet deposit is established to reflect the potential cost of replacing carpeting and other furnishings as a result of pet odors, stains and damage. This fee also reflects the average pet deposit required by apartment facilities in the market area that permit pet ownership.

SANITATION

Dogs and cats are required to be “house-broken”. Cats must be litter-box trained. Dogs must be able to exercise outside the building. Management shall designate a space or spaces to be used exclusively for the purpose of exercising dogs. Pet owners shall be responsible for the immediate clean up of feces after the exercise of their dog. Resident dog owners must place the waste feces in a plastic bag, securely tie and deposit it in designated outdoor trash receptacles. Cat owners shall place “kitty litter” waste in a plastic bag, tie securely, and drop it in specified outdoor trash receptacles. “Kitty-litter” waste may not be disposed of down any garbage chute.

FLEA CONTROL

Upon admission of a pet, the pet owner shall file with Management, proof that a flea control program acceptable to Management will be maintained for a fur bearing pet. Thereafter, the owner of the fur-bearing pet shall file at intervals determined by Management proof that the pet and/or the apartment is being sprayed for fleas by an accredited exterminator or as recommended by an exterminator.

NOISE

No pet may make noise which disrupts other residents. Barking and/or whining dogs and crying or “caterwauling” cats will not be considered acceptable pets.

PET BEHAVIOR

No pet that bites, attacks, or demonstrates other aggressive behavior toward humans or other domesticated animals may be kept.

LEASHES

Dogs and cats shall be on hand-held leashes no longer than 5 feet in length under the control of a responsible individual at all times outside the confines of the pet owner’s apartment.

ALTERNATE CARETAKER

The pet owner must supply the name of a pet sponsor who will be willing to assume immediate responsibility for the pet in case of an emergency (i.e., when the pet owner is absent or unable to adequately maintain the pet). Written verification of the willingness of these persons to assume alternate caretaker responsibility is required. It is the responsibility of the pet owner to inform the management of any change in the name, address or telephone number of the person designated as alternate caretaker. Any expenses relating to alternate caretaker are the responsibility of the pet owner.

In cases of emergency, when management is unable to reach the alternate caretaker, the pet owner agrees to allow management to place the pet in an appropriate boarding facility with all fees and cost borne by the pet owner. Within five days of such an emergency, the resident, his agent, family or estate must make arrangements with the holder of said pet as to its disposition and shall be responsible for all obligations, financial and otherwise, in such disposition.

The resident pet owner absolves Management and/or its agents of any and all liability, financial or otherwise, for actions taken on behalf of the pet owner, or the well-being of the pet.

SICK OR INJURED ANIMALS

No sick or injured pet will be accepted for occupancy without consultation and written acknowledgment of a veterinarian as to the condition of the pet's ability to live in an apartment situation. Acceptance, regardless of documentation and consultation, is the prerogative of the Management. Admitted pets which suffer illness or injury must be immediately taken for veterinarian care at the resident pet owner's expense.

RULE ENFORCEMENT

Any tenant who receives three letters of violation of these pet rules and a letter of intent describing these violations from Management may be required, after private conference, to remove the pet from the premises and provide management with a signed affidavit stating that the pet is no longer on the premises and will not return in the future. Misrepresentation of this affidavit will be grounds for eviction of the resident.

Management exercises the right to act immediately in insisting that an offending pet be removed forthwith in situations deemed to be of an emergency nature. In such instances, Management will act as specified in the section on "Alternate Caretaker" in removing a sick, diseased, or injured and/or aggressive animal.

SPECIALLY-TRAINED ANIMALS

Specially-trained animals to assist the visually and/or hearing impaired and other handicapped persons will not be required to meet the limitations as to pet size, limitations on overall number within the complex, location of pets, or pet deposit, but will be required to meet all other aspects of these rules.

COURTESY

Pets can be therapeutic for those who enjoy, own and care for them. However, pets can be threatening to others who, for whatever reason, are fearful of or allergic to animals. Please exercise common courtesy to other residents and AHA staff in dealing with your pet.

COMPLAINT PROCESS

Management has established a system for handling complaints regarding pet ownership. Management will give the pet owner written notification of a pet rule violation or complaint and will give the owner an opportunity to correct the violation.

The pet owner has the opportunity to meet with management within ten days of written notice to discuss the violation. If the violation is not adequately resolved, management may initiate action to remove the pet or terminate tenancy.

VISITING ANIMALS

These rules pertain only to residents and resident pet owners. No visiting pets are allowed, with the exception of animals through an approved pet therapy program or a disabled visitor requiring a specially-trained animal.

MANAGEMENT'S DETERMINATION FORM

Management will be required to complete the management's determination form. This form will be used to determine whether the pet should be admitted into the building. Management reserves the right to prohibit the admission of any pet in cases where it determines the pet or pet owner will not be able to meet the requirements of these pet rules.

LEGAL OBLIGATIONS

The State of Illinois and the City of Aurora have many laws relating to dogs and cats. The following is a list of main requirements.

1. All dogs and cats must wear a license (available at the City/Village/County Buildings).
2. All dogs and cats must wear a valid rabies tag (available at your

- veterinarian's office).
3. All dogs and cats must wear a tag with the owner's name and address on it (available through a pet store).
 4. All dogs and cats must be leashed and accompanied by the owner or another person at all times when the pet is off the owner's property.
 5. You may not knowingly keep a vicious animal.
 6. You may not permit your dog to defecate on the public highway.
 7. You may not tie your dog or cat so that it can stand on a sidewalk. This means you cannot tie your dog or cat up in your yard so that the pet can reach the sidewalk. Nor can you leave your pet tied outside a store or other building while you go inside.
 8. If your dog or cat should bite a person, it must be isolated at a veterinarian's office for ten days for rabies observation.
 9. You must provide veterinary care, food and shelter for your pet.

PET ADMISSION REQUEST FORM

I hereby request permission to have a pet reside in my premises located at:

Apartment Number_____

_____.

I have read and understand the Pet Rules as are attached and the Lease Addendum pertaining to pets, and by signing this document, evidence my unconditional acceptance of these rules. I understand that the failure to comply with these rules will result in revocation of permission to own a pet. I also understand the failure to remove a pet for not complying with the house rules will be considered by the owner to be material noncompliance with the lease terms and can be used as grounds for eviction.

Upon receipt of the permission to own a pet, within fourteen days, I will provide to you the following information regarding the proposed pet:

1. Type of animal and name of pet
2. Shoulder height
3. Weight
4. Age
5. Sex
6. Color
7. Proof of sterilization
8. Receipt of current paid license
9. Proof of current vaccination
10. Color photograph

Residents Signature

Date

Signature of Witness

Date

15. Civil Rights Certifications

[24 CFR Part 903.7 9 (o)]

Civil rights certifications are included in the PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations.

16. Fiscal Audit

[24 CFR Part 903.7 9 (p)]

1. Yes No: Is the PHA required to have an audit conducted under section

5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h))?
(If no, skip to component 17.)

2. Yes No: Was the most recent fiscal audit submitted to HUD?
3. Yes No: Were there any findings as the result of that audit?
4. Yes No: If there were any findings, do any remain unresolved?
If yes, how many unresolved findings remain? _____
5. Yes No: Have responses to any unresolved findings been submitted to HUD?
If not, when are they due (state below)?

17. PHA Asset Management

[24 CFR Part 903.7 9 (q)]

Exemptions from component 17: Section 8 Only PHAs are not required to complete this component. High performing and small PHAs are not required to complete this component.

1. Yes No: Is the PHA engaging in any activities that will contribute to the long-term asset management of its public housing stock, including how the Agency will plan for long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs that have **not** been addressed elsewhere in this PHA Plan?
2. What types of asset management activities will the PHA undertake? (select all that apply)
 Not applicable
 Private management
 Development-based accounting
 Comprehensive stock assessment
 Other: (list below)
3. Yes No: Has the PHA included descriptions of asset management activities in the **optional** Public Housing Asset Management Table?

18. Other Information

[24 CFR Part 903.7 9 (r)]

A. Resident Advisory Board Recommendations

1. Yes No: Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?

2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)
 X Attached at Attachment (File name) **5. Additional Resident Advisory Board Recommendations** and comments listed below

 X Provided below:

Resident Advisory Board Recommendations From Meeting Of October 5, 1999 4:00 P.M.

June LeCompte

1. The AHA should develop a policy to check on the health and welfare of senior and disabled residents on a daily basis.

Marilyn O'Neil

1. No comments at this time. Reserves the right to add recommendations in the future.

Mary McEntee

1. The AHA should make reasonable accommodations on accepting late rent payments from residents that are very ill or in the hospital. Reasonable accommodations recommended include not to assess late charges and not to evict residents for late rent that are very ill or in the hospital. AHA staff informed Ms. McEntee that it is already AHA policy to waive late rent charges and eviction proceedings due to mitigating circumstances that can be verified.

Mrs. Willis

1. Results of consultation with residents and the Resident Advisory Board should be checked in the "Reasons for Selecting Strategies" section.
2. The AHA should provide a breakdown by site and activity of all Comp Grant items so residents know what work has been performed at their site and how much it cost.
3. What does "PHAS and SEMAP" stand for and what is the resident satisfaction survey and how will it be conducted. AHA staff explained what the acronyms PHAS and SEMAP were and explained the purpose of the resident satisfaction survey and how it will be conducted.

Dee Brial

1. No particular recommendations at this time. Since the QHRWA Act is new, we will see how it works out. Perhaps I will have comments or recommendations in the future.

Jim Cofield

1. The AHA should change the exterior door locks at Centennial House and install a magnetic reader door key system similar to the one at Maple Terrace. This would improve resident security.
2. There are problems with the after hours answering service at times. They do not always call

AHA staff to respond to items that are not considered emergencies, but are still important to residents.

3. In what manner did the PHA address those comments? (select all that apply)

Considered comments, but determined that no changes to the PHA Plan were necessary.

The PHA changed portions of the PHA Plan in response to comments

List changes below:

Added the following recommendation from Mrs. Willis: Results of consultation with residents and the Resident Advisory Board should be checked in the "Reasons for Selecting Strategies" section.

Other: (list below)

B. Description of Election process for Residents on the PHA Board

1. Yes No: Does the PHA meet the exemption criteria provided section 2(b)(2) of the U.S. Housing Act of 1937? (If no, continue to question 2; if yes, skip to sub-component C.)

2. Yes No: Was the resident who serves on the PHA Board elected by the residents? (If yes, continue to question 3; if no, skip to sub-component C.) **AHA Board of Commissioner members are appointed by the Mayor of Aurora. Several residents submitted letters of interest to the Mayors' office for this position. The appointment of an AHA resident as a Board member is forthcoming. As of this date (2/14/00) no appointment has been made**

3. Description of Resident Election Process

a. Nomination of candidates for place on the ballot: (select all that apply)

Candidates were nominated by resident and assisted family organizations

Candidates could be nominated by any adult recipient of PHA assistance

Self-nomination: Candidates registered with the PHA and requested a place on ballot

Other: (describe)

b. Eligible candidates: (select one)

Any recipient of PHA assistance

Any head of household receiving PHA assistance

- Any adult recipient of PHA assistance
- Any adult member of a resident or assisted family organization
- Other (list)

c. Eligible voters: (select all that apply)

- All adult recipients of PHA assistance (public housing and section 8 tenant-based assistance)
- Representatives of all PHA resident and assisted family organizations
- Other (list)

C. Statement of Consistency with the Consolidated Plan

For each applicable Consolidated Plan, make the following statement (copy questions as many times as necessary).

1. Consolidated Plan jurisdiction: **City of Aurora**

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)

- The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
- Other: (list below)

4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)

D. Other Information Required by HUD

Use this section to provide any additional information requested by HUD.

Attachments

Use this section to provide any additional attachments referenced in the Plans.

- 1. Deconcentration Policy**
- 2. AHA Organizational Chart**
- 3. Community Service Policy**
- 4. Public Hearing Comments and Recommendations**
- 5. Additional Resident Advisory Board Recommendations**

PHA Plan Table Library

Annual Statement

- Capital Fund Program (CFP) Part I: Summary**
- Capital Fund Program (CFP) Part II: Supporting Table**
- Capital Fund Program (CFP) Part III: Implementation Schedule**

- Five Year Action Plan Tables (2001 -2005)**

- Public Housing Drug Elimination Program Plan FY2000-2004**

1. Deconcentration Policy

DECONCENTRATION POLICY

It is Aurora Housing Authority's policy to provide for deconcentration of poverty and encourage income mixing by bringing higher income families into lower income developments and lower income families into higher income developments. Toward this end, we will skip families on the waiting list to reach other families with a lower or higher income. We will accomplish this in a uniform and non-discriminating manner.

The Aurora Housing Authority will affirmatively market our housing to all eligible income groups. Lower income residents will not be steered toward lower income developments and higher income people will not be steered toward higher income developments.

Prior to the beginning of each fiscal year, we will analyze the income levels of families residing in each of our developments, the income levels of census tracts in which our developments are located, and the income levels of the families on the waiting list. Based on this analysis, we will determine the level of marketing strategies and deconcentration incentives to implement.

DECONCENTRATION INCENTIVES

The Aurora Housing Authority may offer one or more incentives to encourage applicant families whose income classification would help to meet the deconcentration goals of a particular development.

Various incentives may be used at different times, or under different conditions, but will always be provided in a consistent and nondiscriminatory manner.

OFFER OF A UNIT

When the Aurora Housing Authority discovers that a unit will become available, we will contact the first family on the waiting list who has the highest priority for this type of unit or development and whose income category would help to meet the deconcentration goal and/or the income targeting goal.

The Aurora Housing Authority will contact the family first by telephone to make the unit offer. If the family cannot be reached by telephone, the family will be notified of a unit offer via first class mail. The family will be given five (5) business days from the date the letter was mailed to contact the Aurora Housing Authority regarding the offer.

The family will be offered the opportunity to view the unit. After the opportunity to view the unit, the family will have two (2) business days to accept or reject the unit. This verbal offer and the family's decision must be documented in the tenant file. If the family rejects the offer of the unit, the Aurora Housing Authority will send the family a letter documenting the offer and the rejection.

REJECTION OF UNIT

If in making the offer to the family the Aurora Housing Authority skipped over other families on the waiting list in order to meet their deconcentration goal or offered the family any other deconcentration incentive and the family rejects the unit, the family will not lose their place on the waiting list and will not be otherwise penalized.

If the Aurora Housing Authority did not skip over other families on the waiting list to reach this family, did not offer any other deconcentration incentive, and the family rejects the unit without good cause, the family will forfeit their application's date and time. The family will keep their preferences, but the date and time of application will be changed to the date and time the unit was rejected.

If the family rejects with good cause any unit offered, they will not lose their place on the waiting list. Good cause includes reasons related to health, proximity to work, school, and childcare (for those working or going to school). The family will be offered the right to an informal review of the decision to alter their application status.

2. AHA Organizational Chart (next page)

3. Community Service Policy

14.0 CONTINUED OCCUPANCY AND COMMUNITY SERVICE

14.1 GENERAL

In order to be eligible for continued occupancy, each adult family member must either (1) contribute eight hours per month of community service (not including political activities) within the community in which the public housing development is located, or (2) participate in an economic self-sufficiency program unless they are exempt from this requirement

14.2 EXEMPTIONS

The following adult family members of tenant families are exempt from this requirement.

- A. Family members who are 62 or older
- B. Family members who are blind or disabled
- C. Family members who are the primary care giver for someone who is blind or disabled
- D. Family members engaged in work activity as defined in Section 407(d) of the Social Security Act (42 U.S.C. 607(d) as in effect on and after July 1, 1997
- E. Family members who are exempt from work activity under Part A Title IV of the Social Security Act or under any other State welfare program, including the welfare-to-work program
- F. Family members receiving assistance under a State program funded under Part A Title IV of the Social Security Act or under any other State welfare program, including welfare-to-work and who are in compliance with that program

14.3 NOTIFICATION OF THE REQUIREMENT

The AHA shall identify all adult family members who are apparently not exempt from the community service requirement.

The AHA shall notify all such family members of the community service requirement and of the categories of individuals who are exempt from the requirement. The notification will provide the opportunity for family members to claim and explain an exempt status. The AHA shall verify such claims.

The notification will advise families that their community service obligation will begin upon the effective date of their first annual reexamination on or after 10/1/99. For family's paying a flat rent, the obligation begins on the date their annual reexamination would have been effective had an annual reexamination taken place. It will also advise them that failure to comply with the community service requirement will result in ineligibility for continued occupancy at the time of any subsequent annual reexamination.

14.4 VOLUNTEER OPPORTUNITIES

Community service includes performing work or duties in the public benefit that serve to improve the quality of life and/or enhance resident self-sufficiency, and/or increase the self-responsibility of the resident within the community.

An economic self sufficiency program is one that is designed to encourage, assist, train or facilitate the economic independence of participants and their families or to provide work for participants. These programs may include programs for job training, work placement, basic skills training, education, English proficiency, work fare, financial or household management, apprenticeship, and any program necessary to ready a participant to work (such as substance abuse or mental health treatment).

The AHA will coordinate with social service agencies, local schools, and the Human Resources Office in identifying a list of volunteer community service positions.

Together with the resident advisory councils, the AHA may create volunteer positions such as hall monitoring, litter patrols, and supervising and record keeping for volunteers.

14.5 THE PROCESS

At the first annual reexamination on or after October 1, 1999, and each annual reexamination thereafter, the AHA will do the following:

- A. Provide a list of volunteer opportunities to the family members (by phone, in

person ,etc.)

- B. Provide information about obtaining suitable volunteer positions.
- C. Provide a volunteer time sheet to the family member. Instructions for the time sheet require the individual to complete the form and have a supervisor date and sign for each period of work.
- D. At the time of the family's next lease anniversary date or recertification, the family will meet with their Property Manager, review each applicable family member's community service time sheet and determine if each applicable adult family member is in compliance with the community service requirements.

14.6 NOTIFICATION OF NON-COMPLIANCE WITH COMMUNITY SERVICE REQUIREMENT

The AHA will notify any family found to be in noncompliance of the following:

- A. The family member(s) has been determined to be in noncompliance;
- B. That the determination is subject to the grievance procedure; and
- C. That, unless the family member(s) enter into an agreement to comply, the lease will not be renewed or will be terminated.

14.7 OPPORTUNITY FOR CURE

The AHA will offer the family member(s) the opportunity to enter into an agreement prior to the anniversary of the lease. The agreement shall state that the family member(s) agree(s) to enter into an economic self-sufficiency program or agree(s) to contribute to community service for as many hours as needed to comply with the requirement over the past 12-month period. The cure shall occur over the 12-month period beginning with the date of the agreement and the resident shall at the same time stay current with that year's community service requirement. The first hours a resident earns goes toward the current commitment until the current year's commitment is made.

If any applicable family member does not accept the terms of the agreement, does not fulfill their obligation to participate in an economic self-sufficiency program, or falls

behind in their obligation under the agreement to perform community service by more than three (3) hours after three (3) months, the AHA shall take action to terminate the lease.

14.8 AHA VOLUNTEER SERVICE LISTINGS

Allen Elementary, 700 South Farnsworth Avenue, Aurora, Il 60505 are seeking volunteers to assist staff during lunch periods. Contact Barbara Krejca at (630) 898-1602 for more information.

Aurora Township, 515 Gale Street, Aurora, Il 60506 are seeking volunteers to assist staff and children for sports, and early development programs. Contact Ken Maurice at (630) 859-7501 for more information.

Bardwell Elementary, 954 South Lincoln, Aurora, Il 60505 are seeking volunteers to assist staff. Contact Thomas Hartman at (630) 844-5754 for more details.

Beaupre Elementary, 954 East Benton Street, Aurora, Il 60505 are seeking volunteers to assist staff. Contact Gloria Morgan at (630) 898-3155 for more details.

Big Brothers Big Sisters Program, 70 South River Street, Aurora, Il 60506 are seeking volunteers to help mentor children ages 6-12. Contact Kelly Clason at (630) 844-3084 for more information.

Breaking Free, 120 Gales Street, Aurora, Il 60506 are seeking volunteers to help assist children during the after school programs located at the Public Housing Sites of Jericho Circle and Eastwood. Contact Linda Kolaya at (630) 355-2585 or Becky Tressel at (630) 897-1003 for more information and a facility closest to you.

Cowherd Middle School, 441 North Farnsworth Avenue, Aurora, Il 60505 are seeking volunteers to assist staff for various programs. Contact Barbara Hines or Pat Davenport at (630) 978-3760 for more details.

Dieterich Elementary, 1141 Jackson Street, Aurora, Il 60505 are seeking volunteers to assist staff. Contact Gwendolyn Miller at (630) 898-4031.

East Aurora High School, 500 Tomcat Lane, Aurora, Il 60505 are seeking volunteers to assist staff. Contact Robert Barwa at (630) 898-0962 for more information.

Edna M. Rollins School, 950 Kane Street, Aurora, Il 60505 are seeking volunteers to assist staff. Contact Karen Hart at (630) 978-0404 for more details.

Fox Valley Girl Scout Council, are seeking volunteer Troop Leaders and Assistant Leaders to organize a group of girls in their area or assist scout troops in their area. If you are interested please contact Nelly Venecia and Rachael Garcia at (630) 897-1565 for a location near you.

Flyers Track Club, Aurora, Il 60505 are seeking volunteers to assist the coach in preparing children for out door track and fields events. Contact Thomas Boatwright at (708) 817-6946 for more information and the location of sports events.

Fox Valley Special Recreation Association, North Aurora, Il 60542 are seeking volunteers to assist with many different programs. Please contact Jenny Leech at (630) 896-6066 for more information.

Gates Elementary, 800 Seventh Avenue, Aurora, Il 60505 are seeking volunteers to assist staff. Contact Kathleen Richmond at (630) 898-2280 for further details.

Hermes Elementary, 1000 Jungles Avenue, Aurora, Il 60505 are seeking volunteers to assist staff. Contact Mary Ann White at (630) 898-4610 for more information.

Johnson Clifford Elementary, Liberty Road, Aurora, Il 60505 are seeking volunteers to assist staff. Contact Patricia Haynes at (630) 898-7568 for more details.

Krug Elementary, 240 Melrose Avenue, Aurora, Il 60505 are seeking volunteers to assist staff. Contact Kathy Navota at (630) 844-5750 for more details.

Mutual Ground, P.O. Box 843, Aurora, Il 60507 are seeking female volunteers to help assist staff with child care, transportation, office procedures, and various program needs. Contact Pam Clemen at (630) 897-0084 for more information.

Oak Park Elementary, 1200 Front Street, Aurora, Il 60505 are seeking volunteers to assist staff. Contact Anne Benavides at (630) 898-5036 for more details.

O'Donnell Elementary, 1640 Reckinger Road, Aurora, Il 60505 are seeking volunteers to assist staff. Contact Ed Brouch at (630) 898-5857 for more information.

PAD'S, 659 South River Street, Aurora, Il 60506 are seeking volunteers to help with several different programs. PAD'S AM needs volunteers from 9:00 a.m. - 3:00 p.m., on Tuesday thru Friday. Volunteers are needed from 7:00 p.m. - 7:00 a.m., seven days a week for the emergency shelter program. Contact Jessie Hernandez at (630) 897-2156 or (630) 897-2165 for more information.

Provena Mercy Center, Highland Avenue, Aurora, Il 60506 are seeking volunteers to assist staff. Contact Maria Fredrickson at (630) 801-2666 or Nancy Shaddle at (630) 801-2665 for more information.

Simmons Middle School, 1130 Sheffer Road, Aurora, Il 60506 are seeking volunteers to assist staff. Contact Greg Sawka or Pat Davenport at (630) 898-8965 for more information about various in school and after school programs.

Senior Services Associates, are seeking volunteers to assist staff. Contact Roberta Basham at (630) 897-4035 for more information.

Two Rivers Head Start, 107 Jackson Street, Aurora, Il 60505 are seeking volunteers to help assist staff. Contact Sue Bekoyer at (630) 375-9800 for further details.

United Way, 111 West Downer Place, Aurora, Il 60506 are seeking volunteers to help assist staff for varies projects through out the year. Contact Diane Marino at (630) 896-4636 for more information.

Waldo Middle School, 56 Jackson Street, Aurora, Il 60505 are seeking volunteers to assist staff. Contact Lenore Hernandez at (630) 898-8820 for more details.

4. Public Hearing Comments and Recommendations

Public Hearing conducted on Thursday, November 18, 1999 at 5:00 P.M.

Persons attending: David Kramer, Sharon Ferguson, Eileen Garcia and Diana Sefton of the AHA and Ms. Pauline Koffman, Attorney from Prairie State Legal Services. Only comments received were submitted in writing from Ms. Koffman.

Comments from Prairies State Legal Services

November 18, 1999

David Kramer
Deputy Executive Director
Aurora Housing Authority
1630 W. Plum Street
Aurora, IL 60506

Re: Aurora Housing Authority 5 Year Plan for Fiscal Years 2000-2004/Annual Plan for Fiscal Year 2000

Dear Mr. Kramer:

Prairie State Legal Services (“PSLS”) is a nonprofit organization that offers legal services to low income and senior citizen individuals and households in northern Illinois. PSLS regularly represents individuals who live in housing operated by the Aurora Housing Authority (“AHA”) as well as individuals who are participants in the Section 8 rental assistance program.

The AHA is required to develop a Five Year and Annual Plan detailing their operational policies, procedures, and goals under the Quality Housing and Work Responsibility Act of 1998 (“QHWRA”) Pub. L.No. 105-276, Title V, 112 Stat. 2461, 2518 (Oct. 21, 1998), codified at various parts of 42 U.S.C. §1437-13664. On behalf of our client, a resident in property owned by the AHA, PSLS submits the following comments on the AHA 5 Year Plan for Fiscal Years 2000-2004/Annual Plan for Fiscal Year (“Plan”). Based on several deficiencies in the current Plan, I urge the AHA to review the following comments with its staff and the Board of Commissioners, to refuse approval of the Plan in its current form, and to incorporate the following changes in consultation with the Resident Advisory Board (“RAB”) prior to submitting a final Plan to HUD.

I. Procedural Deficiencies of the AHA Plan

It is imperative that the public be permitted to actively participate in the PHA planning process. In order to encourage such participation of public housing residents, Section 8 Voucher/Certificate participants and other interested parties, 24 C.F.R. 903.17(b) requires that: “not later than 45 days before the public hearing is to take place, the PHA must (1) make the proposed PHA plan(s) and all information relevant to the public hearing to be conducted, available for inspection by the public.” In its Final Rule on 24 CFR 903.17(b), issued on October 21, 1999, HUD specifies that not only the PHA plans must be available for review by the public, but also all attachments and documents related to the plan must be available for review by the public.

Unfortunately, the AHA has failed to comply with this regulation. The AHA has not yet made available to the public the new Administrative Plan, Admissions and Continued Occupancy Policy and flat rent policy which are required attachments to the PHA Plan. According to the AHA, the existing Administrative Plan and the Admissions and Continued Occupancy Policy are not yet updated, not in compliance with QWHRA and not yet available to the public for comment. The flat rent policy has not yet been developed. The 45-day notice period is statutorily required. By the AHA proceeding with the hearing without first making these documents available to the public at least 45 days before the public hearing on

the PHA Plan and without additional consultation with the RAB, reflects a lack of respect for the public participation component of this important planning process. At a minimum, the AHA should conduct a supplemental public hearing following the availability of these key documents as well as additional consultation with the RAB. PSLs reserves the right to comment fully on these documents upon their availability to the public.

In addition, the AHA was mandated to establish a RAB to assist them in developing the Plan. All PHA's are required to allocate reasonable resources to assure to effective function of the RAB. These "reasonable resources" must result in reasonable means for the RAB to become informed on programs covered by the Plan, communicate in writing and by telephone with assisted families, hold meetings with assisted families, and access information regarding covered programs on the Internet. 24 C.F.R. §903.13 and 64 Fed. Reg. 56844 (Oct. 21, 1999). Although the AHA did appoint a RAB, it is questionable if they adequately reflected and represented the residents. It is unclear if the AHA provided the RAB with the mandated reasonable resources. Furthermore the independence of the RAB is suspect, as one member of the RAB is also employed by the AHA.

II. Substantive Deficiencies of the AHA Plan

A. Income Exclusions and Deductions

The AHA does not include any information on income exclusions or deductions within the Plan. The exception is a one paragraph statement under a section entitled "Determination of Total Tenant Payment and Tenant Rent" following page 23, under the subtitle "The Formula Method." Presumably the lack of this information with the Plan is due to the AHA not attaching an updated Admissions and Continued Occupancy Policy or Administrative Plan. PSLs reserves the right to comment on the AHA policy on income deductions and exclusions at that time, however we currently urge the AHA to include all statutorily permissible income deductions and exclusions.

B. Flat Rent/Ceiling Rent

The AHA Plan provides that in setting the market-based flat rents, they utilize the Section 8 rent reasonableness study of comparable housing, a survey of rents listed in local newspapers, and a survey of similar unassisted units in the neighborhood. However, the AHA Plan has not yet developed any flat rent policy. The AHA is required to establish flat rents for each public housing unit which is based on the rental value of such unit. 42 U.S.C. §1437a(a)(2). The development of such policy is a key aspect of the QHWRRA.

PSLS further urges the AHA to consider establishing a ceiling rent which would place a limit on the amount a tenant can pay and can never be applied to a tenant if it is greater than 30% of their income. A ceiling rent would act as an incentive toward the AHA policy of increasing the incomes of current public housing families in order to become self-sufficient.

C. Income based rent

The AHA does not clearly set forth its income based rent policy in the Plan. The AHA does not initially indicate within the Plan whether they will employ any discretionary policies for income based rent (Plan, p.21 4A(1)a). Several pages later, following page 23, the Plan does include some, albeit incomplete information on this discretionary policy in a section entitled "Determination of Total Tenant Payment and Tenant Rent."

The AHA is required to describe procedures by which families with flat rents may immediately switch to income-based rents as soon as they experience a financial hardship. 42 U.S.C. §1437a(a)(2)(C). However, the Plan does not adequately describe its policy on financial hardship. The definition of "other circumstances" which create a hardship on the family must be more clearly defined to avoid confusion.

D. Minimum rent policy

Although the AHA is permitted by Congress to impose minimum rents of up to \$50 for public housing and Section 8 voucher holders, it does not require that they establish a minimum.

The AHA policy on minimum rent and the discretionary hardship exemption policy enumerated within the Plan is inconsistent and flawed. The AHA Plan states first that the PHA has not adopted any discretionary hardship exemption policy for public housing and Section 8 tenants on established minimum rent (Plan, p.21, p23). It then continues to set out a discretionary policy following page 23 entitled "Determination of Total Tenant Payment and Tenant Rent." It is unclear if this program refers to public housing, Section 8 tenants or both.

In addition, problems exist with the exemption policy referred to in the previous paragraph. It provides that the AHA will immediately suspend the minimum rent for a family if that family requests an exemption due to a hardship. This occurs if the AHA determines the hardship to be of a "temporary nature." In this scenario, the minimum rent would be reinstated retroactively to the time of the suspension. The AHA would offer a repayment agreement on this retroactively reinstated rent. However, if the family defaults on the repayment agreement, the family could still be evicted in accordance with "Section 19" of the policy. The "Section

19" policy referred to is not contained within the Plan. Moreover, nothing in 42 U.S.C. §1437a(a)(3)(A) authorizes the AHA to recoup "suspended" minimum rents through a repayment agreement. In effect, the AHA recoupment policy may deny the family the intended protection of §1437a(a)(3)(B)(o), that is a prohibition of an imposition of a minimum rent that would result in a family's eviction.

Furthermore, there is no prompt procedure established for a family to challenge the AHA determination that a financial hardship is "temporary". The plan states only that the family may use the grievance procedure to appeal the AHA decision. However, the grievance procedure is not included within or attached to the AHA Plan, most likely because the AHA has not developed a revised Admissions and Continued Occupancy Policy and Administrative Plan. In addition, the Plan does not state that if the family demonstrates their financial hardship is long term following the 90 day period, that they are entitled to a retroactive exemption.

A complete elimination of the AHA's proposed minimum rent of \$25 would be a minimal financial constraint for the AHAs overall budget. In addition, the burdens on the AHA to administer its minimum rent policy may outweigh any substantial benefit as the AHA will need to determine on a case by case basis how to classify each hardship. The AHA will be required to give each family notice of its determination and an opportunity for an administrative hearing should the family disagree with the AHA. PSLS urges the AHA to exercise its option to not establish a minimum rent.

E. Section 8 Voucher Payment Standards

Pursuant to QHWRA, the AHA must set Section 8 payment standards between 90 and 110 percent of the fair market rent ("FMR") established by HUD for the jurisdiction. 42 U.S.C. §1437f(o)(1)(B). The AHA may also set their payment standard above 110 percent with prior approval from HUD.

The Section 8 payment standard established by the AHA is 90 percent of the fair market rent, the lowest possible rate. It is predictable that many Section 8 participants will be unable to find affordable housing. This is further exacerbated by the requirement of 42 U.S.C. §1437f(o)(3) and 24 C.F.R. § 982.508 (2000), 64 Fed. Reg. 56894 (Oct. 21, 1999)(adopting and revising portions of the prior interim rule), amended at 64 Fed. Reg. 59620 (Nov. 3, 1999), by which new and existing participants who seek to use their voucher may not take on a rent burden in excess of 40 percent of their adjusted income, and thus may not use their vouchers for such units.

The low payment standard coupled with the 40% limitation severely limits a participant's ability to secure housing in the community of their choice. In particular, it is

predictable that many participants will be forced to rent in a greatly restricted housing market, in areas of high poverty concentration and in substandard housing. A disproportionate number of minorities, disabled persons and extremely low-income households may not even be able to use their vouchers at all because they will not be able to find housing where their share of the rent would be less than 40% of their adjusted income. This problem is illustrated in a graph entitled "Section 8 Vouchers: Effect of Payment Standard at 90%, 100% and 110% of Fair Market Rent," attached as Exhibit A.

A higher payment standard will also assist the AHA in its mandated efforts to affirmatively further fair housing. A low payment standard will continue to put protected groups under fair housing laws in a clearly disadvantaged position. PSLS urges the AHA to raise their payment standard to 110% of FMR which will result in far greater opportunities for participants to use their voucher in the community of their choice.

In further support of its position, PSLS suggests the AHA consider the minimal amount of financial risk to them by raising its payment standard. On October 21, 1999, HUD published its final regulation governing renewal of expiring Section 8 tenant-based assistance contracts. 24 C.F.R. §982.102 (64 Fed. Reg. 56882). The new rule applies to contracts set to expire after December 31, 1999. The new rule results in no financial disincentive to a PHA to increase the voucher payment standards when necessary to promote mobility, achieve adequate utilization of contracted funds, restrain payment burdens and/or meet targeting requirements, or to admit more poor families than required by the federal targeting floor. Therefore, the AHA can meet these goals and still be assured of sufficient funds to serve at least the number of families that HUD considers its "baseline:" that is, the number of families actually served, or that HUD records indicate the AHA was contracted to serve, on October 1, 1997 (whichever is high), plus any additional "units" subject to HUD/AHA contract after that date. (See Preamble at 64 Fed. Reg. 56883.)

The rule reaches this result by using each PHA's actual average per subsidy costs to calculate the renewal budget authority needed in the following year (or possibly the second following year, depending on the timing of budget audits) to renew the "baseline" number of units, adjusted for any new vouchers which HUD has issued to the PHA as well as by an inflation factor. Therefore, if the AHA's average cost has increased, the increased cost will be reflected in its renewal funding.

To avoid a reduction in the number of families served below the "baseline" during the year when per unit costs first increase and possibly the following year, the AHA would be permitted to draw more liberally on the 2-month reserve that HUD provides to each PHA. This new reserve policy is to be issued shortly in a Federal Register notice. (See Preamble at 64 Fed. Reg. 56883). Moreover, if it occurs that the actual average per subsidy cost decreases compared to a prior year (because of a lowered payment standard, family income

increase, rent decrease or another reason), the AHA may then serve additional families during any year in which they have “extra” funds. The current length of the closed Section 8 waiting list and the AHAs past experience with the large number of people who apply to the list every time it is reopened demonstrate the great need in the community for additional Section 8 assistance from the AHA.

F. Homeownership programs

The AHA Plan does not include any plan to apply to administer any homeownership programs under section 5(h), the HOPE I program, or 42 U.S.C. 1437z-4 (Plan, p.33). This program created within QHWRA would permit qualified Section 8 tenants to utilize their Section 8 rental assistance for mortgage payments instead of rent. This program would create opportunities for Section 8 tenants consistent with the AHA mission statement that “...the primary focus of our mission is...to improve opportunities for upward mobility and independent lifestyles.” The AHA would be greatly assisting Section 8 tenants in reaching this goal if they take advantage of the opportunity this program will provide. Furthermore, it is consistent with the AHA goal to affirmatively further fair housing and to eliminate impediments to fair housing. Last, it would likely assist low income tenants to move away from neighborhoods containing a high concentration of poverty. PSLS urges the AHA to apply to administrate a homeownership program and to include a description of that program in its Plan.

Thank you for your consideration of these comments. Please feel free to contact me if you have any questions or concerns at (630) 232-9415.

Sincerely,

Pauline R. Koffman
Staff Attorney

Public Hearing conducted on Thursday, February 3, 2000 at 5:00 P.M.

Persons attending: Ms. Pauline Koffman, Attorney from Prairie State Legal Services and Mary McEntee, a resident from Centennial House.

Comments Received:

**AHA Annual Plan
Public Hearing Comments
Thursday, February 3, 2000 5:00 P.M.**

Only two persons attended the Public Hearing. They were Mary McEntee a resident of Centennial House and Pauline Koffman, an attorney from Prairie State Legal Services.

Ms. Koffman presented a written copy of her comments and recommendations. She also included a disk copy for ease of inclusion in the text version of the Annual Plan.

Mary McEntee had two recommendations. The first was a request for the replacement of stoves at Centennial House. The second was the replacement of foggy windows at Centennial House (double glazed windows where the seal has broken and there is mineral glaze on the window which causes a transparent milky white effect).

I explained to Ms. McEntee that both items were covered in Comp Grant Program IL06-PO90-708 and would be accomplished within the next year.

Ms. Koffman concluded her statement by requesting how and when her recommendations would be submitted to AHA staff and AHA Board members and what action would be taken.

I informed Ms. Koffman that recommendations received would be shared with AHA staff during the week of February 7, 2000, and provided to Board members along with the draft plan for review and hopeful approval at the February 16, 2000 Board meeting.

The hearing ended at approximately 5:20 P.M..

Reported by: David Kramer
Deputy Executive Director
Aurora Housing Authority

Prairie State Written Comments and Recommendations

February 3, 2000

David Kramer
Deputy Executive Director
Aurora Housing Authority
1630 W. Plum Street

Aurora, IL 60506

Re: Aurora Housing Authority 5 Year Plan for Fiscal Years 2000-2004/Annual Plan for Fiscal Year 2000/Administrative Plan/ACOP

Dear Mr. Kramer:

Prairie State Legal Services (“PSLS”) is a nonprofit organization that offers legal services to low income and senior citizen individuals and households in northern Illinois. PSLS regularly represents individuals who live in housing operated by the Aurora Housing Authority (“AHA”) as well as individuals who are participants in the Section 8 rental assistance program.

The AHA is required to develop a Five Year and Annual Plan detailing their operational policies, procedures, and goals under the Quality Housing and Work Responsibility Act of 1998 (“QHWRA”) Pub. L.No. 105-276, Title V, 112 Stat. 2461, 2518 (Oct. 21, 1998), codified at various parts of 42 U.S.C. §1437-13664. On November 18, 1999, on behalf of our client, a resident in property owned by the AHA, PSLS submitted comments on the AHA 5 Year Plan for Fiscal Years 2000-2004/Annual Plan for Fiscal Year (“Plan”). However, prior to that date, all attachments to the Plan were not made available pursuant to the Final Rule in 24 CFR 903.17(b), issued by HUD on October 21, 1999. That Rule specified that not only the PHA plans must be available for review by the public, but also all attachments and documents related to the plan must be available for review by the public. Therefore, at this time we are submitting additional comments following our review of the draft Admissions and Continued Occupancy Policy for the Public Housing Program (“ACOP”) and the Section 8 Administrative Plan. Based on several substantive deficiencies in the current Plan, I urge the AHA to review the following comments with its staff and the Board of Commissioners, to refuse approval of the Plan, ACOP and Section 8 Administrative Plan in their current forms, and to incorporate the following changes in consultation with the Resident Advisory Board (“RAB”) prior to submitting a final Plan, ACOP and Section 8 Administrative Plan to HUD.

A. Rent Determination Issues

1. Mandatory Income Deductions

Child care expenses which enable a family member to work or attend school are a mandatory income deduction under federal law 42 U.S.C. 1437a(b)(5)(A)(iii). Both the ACOP and the Section 8 Administrative Plan, however, limit child care expense deductions to

children under 13 years of age. (ACOP, 11.3, E, p. 29, p. 85)(Admin., 9.0E, p. 50)However, setting an absolute age limit for deducting childcare expenses will adversely impact families which include children with disabilities. Although the federal regulations define “child care expenses” as applying only to children under 13, child care expenses for older children with disabilities fall within the definition of “disability assistance expenses,” which can be deducted pursuant to 24 C.F.R. §5.611. Therefore, we suggest that the AHA provide that, for disabled family members who are children 13 and older, child care expenses which enable a family member to actively seek employment, to be employed, or to further his or her education shall be considered deductible disability assistance expenses.

2. Permissive Exclusions:

Pursuant to 24 C.F.R. §5.609(d), a PHA may adopt a number of permissive exclusive from the annual income of PHA residents. We suggest that the AHA adopt the following exclusions: 1) exclusion of all or part of the family’s earned income; 2) exclusion of the earned income of the head of household, the spouse, or another family member age 18 or older; 3) exclusion of the earned income of persons other than the primary earner; 4) exclusion of income of applicants, newly admitted families, existing tenants, or persons joining the family; 5) exclusion of any or all of the costs that are incurred in order to go to work but are not compensated, such as the cost of special tools, equipment, or clothing; 6) exclusion of any or all of the costs that result from earning income, such as social security taxes or other items that are withhold in payroll deductions; 7) exclusion of any portion of the earned income that is not available to meet the family’s own needs, such as amounts that are paid to someone outside the family for alimony or child support; 8) exclusion of any portion of the earned income that is necessary to replace benefits lost because a family member becomes employed, such as amounts that the family pays for medical costs or to obtain medical insurance. PHAs do not need HUD approval to adopt such optional earned income exclusions. These permissive exclusions will greatly assist tenants in moving toward self-sufficiency.

3. Flat Rent/Ceiling Rent

The AHA flat rent policy as set forth in the ACOP does not identify any flat rents that will be in effect, nor does it state when those rates will be available. The AHA states that they “determined the market value of the unit and set the rent at the market value.” (ACOP, 13.4, p. 35). There is no indication, however, that the AHA conducted a comparability study of unassisted units in the local area as required by HUD 62 Fed. Re. 62927 (Nov. 25, 1997). In addition, the creation of the flat rent policy was designed to encourage assisted families to work and increase their incomes. Therefore, logically, it should be set low enough to act as an incentive for working families to accept the flat rent. The AHA is required to federal law to

not make their flat rent policy act as a disincentive to families achieving self-sufficiency. 42 U.S.C. §1437a(a)(2)(B)(i)(II). Therefore, by adopting flat rents at the fair market value, they are violating this requirement. Last, the ACOP only requires that the AHA give affected families a 30 day notice of any rent change. (ACOP, 13.4, p. 35). PSLs suggests that the AHA adopt a policy of providing affected families with a 90 day notice of any rent change so as to lessen the potential financial hardship on a family unit.

PSLS further urges the AHA to consider establishing a ceiling rent which would place a limit on the amount a tenant can pay and can never be applied to a tenant if it is greater than 30% of their income. A ceiling rent would act as an incentive toward the AHA policy of increasing the incomes of current public housing families in order to become self-sufficient.

4. Minimum rent policy

Although the AHA is permitted by Congress to impose minimum rents of up to \$50 for public housing and Section 8 voucher holders, it does not require that they establish a minimum.

The AHA policy on minimum rent and the discretionary hardship exemption policy enumerated within the Plan, ACOP and the Section 8 Administrative Plan is inconsistent. The AHA Plan states first that the PHA has not adopted any discretionary hardship exemption policy for public housing and Section 8 tenants on established minimum rent (Plan, p.21, p23). In the ACOP and Section 8 Administrative Plan the AHA does set out a hardship policy.(ACOP, pp. 34-35)(Admin, 11.5B, pp. 60-61).

Several problems exist with the exemption policy as set forth in the ACOP and Section 8 Administrative Plan. It provides that the AHA will immediately suspend the minimum rent for a family if that family requests an exemption due to a hardship. This occurs if the AHA determines the hardship to be of a “temporary nature.” In this scenario, the minimum rent would be reinstated retroactively to the time of the suspension. The AHA would offer a repayment agreement on this retroactively reinstated rent. However, according to the ACOP provision, if the family defaults on the repayment agreement, the family could still be evicted in accordance with Section 19 of the ACOP. This conflicts with federal law. Nothing in 42 U.S.C. §1437a(a)(3)(A) authorizes the AHA to recoup “suspended” minimum rents through a repayment agreement. Attempting to impose the minimum rent through a repayment agreement would circumvent that rule in violation of the statute. The language in the Section 8 Administrative Plan closely mirrors that of the ACOP. In addition, nowhere in the exemption policy does it state how much time the AHA is given to make a decision if a hardship is temporary or long term. In effect, the AHA recoupment policy may deny the family the intended protection of 42 U.S.C. §1437a(a)(3)(B)(o), that is a prohibition of an imposition of a minimum rent that would result in a family’s eviction.

In addition, the Plan does not state that if the family demonstrates their financial hardship is long term following the 90 day period, that they are entitled to a retroactive exemption. See 42 U.S.C. §1437a(a)(3)(B)(ii). The AHA also does not include a permissible exception for families containing a lawfully admitted alien that would be eligible for public benefits, but for the Personal Responsibility and Work Opportunity Reconciliation Act of 1996. 42 U.S.C. §1437a(a)(3)(B)

A complete elimination of the AHA's proposed minimum rent of \$25 would be a minimal financial constraint for the AHAs overall budget. Furthermore, the large burden on the AHA to administer its minimum rent policy may outweigh any substantial benefit as the AHA will need to determine on a case by case basis how to classify each hardship. The AHA will be required to give each individual family notice of its determination and, should a family disagree with the AHA determination, an opportunity for two administrative hearings. PSLs urges the AHA to exercise its option to not establish a minimum rent.

5. Section 8 Voucher Payment Standards

Pursuant to QHWRRA, the AHA must set Section 8 payment standards between 90 and 110 percent of the fair market rent ("FMR") established by HUD for the jurisdiction. 42 U.S.C. §1437f(o)(1)(B). The AHA may also set their payment standard above 110 percent with prior approval from HUD.

The Section 8 payment standard established by the AHA is 90 percent of the fair market rent, the lowest possible rate. It is predictable that many Section 8 participants will be unable to find affordable housing. This is further exacerbated by the requirement of 42 U.S.C. §1437f(o)(3) and 24 C.F.R. § 982.508 (2000), 64 Fed. Reg. 56894 (Oct. 21, 1999)(adopting and revising portions of the prior interim rule), amended at 64 Fed. Reg. 59620 (Nov. 3, 1999), by which new and existing participants who seek to use their voucher may not take on a rent burden in excess of 40 percent of their adjusted income, and thus may not use their vouchers for such units.

The low payment standard coupled with the 40% limitation severely limits a participant's ability to secure housing in the community of their choice. In particular, it is predictable that many participants will be forced to rent in a greatly restricted housing market, in areas of high poverty concentration and in substandard housing. A disproportionate number of minorities, disabled persons and extremely low-income households may not even be able to use their vouchers at all because they will not be able to find housing where their share of the rent would be less than 40% of their adjusted income. This problem is illustrated in a graph entitled "Section 8 Vouchers: Effect of Payment Standard at 90%, 100% and 110% of Fair

Market Rent,” attached as Exhibit A.

A higher payment standard will also assist the AHA in its mandated efforts to affirmatively further fair housing. A low payment standard will continue to put protected groups under fair housing laws in a clearly disadvantaged position. PSLs urges the AHA to raise their payment standard to 110% of FMR which will result in far greater opportunities for participants to use their voucher in the community of their choice.

In further support of its position, PSLs suggests the AHA consider the minimal amount of financial risk to them by raising its payment standard. On October 21, 1999, HUD published its final regulation governing renewal of expiring Section 8 tenant-based assistance contracts. 24 C.F.R. §982.102 (64 Fed. Reg. 56882). The new rule applies to contracts set to expire after December 31, 1999. The new rule results in no financial disincentive to a PHA to increase the voucher payment standards when necessary to promote mobility, achieve adequate utilization of contracted funds, restrain payment burdens and/or meet targeting requirements, or to admit more poor families than required by the federal targeting floor. Therefore, the AHA can meet these goals and still be assured of sufficient funds to serve at least the number of families that HUD considers its “baseline:” that is, the number of families actually served, or that HUD records indicate the AHA was contracted to serve, on October 1, 1997 (whichever is high), plus any additional “units” subject to HUD/AHA contract after that date. (See Preamble at 64 Fed. Reg. 56883.)

The rule reaches this result by using each PHA’s actual average per subsidy costs to calculate the renewal budget authority needed in the following year (or possibly the second following year, depending on the timing of budget audits) to renew the “baseline” number of units, adjusted for any new vouchers which HUD has issued to the PHA as well as by an inflation factor. Therefore, if the AHA’s average cost has increased, the increased cost will be reflected in its renewal funding.

To avoid a reduction in the number of families served below the “baseline” during the year when per unit costs first increase and possibly the following year, the AHA would be permitted to draw more liberally on the 2-month reserve that HUD provides to each PHA. This new reserve policy is to be issued shortly in a Federal Register notice. (See Preamble at 64 Fed. Reg. 56883). Moreover, if it occurs that the actual average per subsidy cost decreases compared to a prior year (because of a lowered payment standard, family income increase, rent decrease or another reason), the AHA may then serve additional families during any year in which they have “extra” funds. The current length of the closed Section 8 waiting list and the AHAs past experience with the large number of people who apply to the list every time it is reopened demonstrate the great need in the community for additional Section 8 assistance from the AHA.

B. Homeownership programs

The AHA Plan does not include any plan to apply to administer any homeownership programs under section 5(h), the HOPE I program, or 42 U.S.C. 1437z-4 (Plan, p.33). This program created within QHWRA would permit qualified Section 8 tenants to utilize their Section 8 rental assistance for mortgage payments instead of rent. This program would create opportunities for Section 8 tenants consistent with the AHA mission statement that "...the primary focus of our mission is...to improve opportunities for upward mobility and independent lifestyles." The AHA would be greatly assisting Section 8 tenants in reaching this goal if they take advantage of the opportunity this program will provide. Furthermore, it is consistent with the AHA goal to affirmatively further fair housing and to eliminate impediments to fair housing. Last, it would likely assist low income tenants to move away from neighborhoods containing a high concentration of poverty. PSLs urges the AHA to apply to administrate a homeownership program and to include a description of that program in its Plan.

C. Public Housing Grievance Procedure/Section 8 Grievance Procedure

PSLS has several concerns about the Section 8 grievance procedure and the ACOP grievance procedure for Public Housing.

First, the ACOP procedure states that it applies to any individual grievance except those for termination of tenancy or eviction which involve: "(1) Any criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises of other residents or employees of AHA, or (2) any drug-related criminal activity *on or off* such premises." (ACOP, 20.5, p.58) This provision violates the federal regulations, which limits the waiver of grievance procedure for drug-related criminal activity "on or near such premises." 24 C.F.R. §§966.51(a)(2)(i)(B), 966.55(g)(1)(ii). The ACOP policy is overbroad because it encompasses drug-related criminal activity which occurs anywhere, not just activity on or near the premises. If the alleged activity is not "on or near such premises" the federal regulations guarantee the accused tenant the right to the full grievance procedure.

Second, the time limits to request a grievance hearing under the ACOP and Section 8 Administrative Plan are unreasonable. Specifically, the ACOP policy requires that a complainant present to the AHA in writing a request for an informal settlement conference within "five (5) business days after the occurrence of the event giving rise to the grievance," (ACOP, 20.5, p.60) and a request for a formal grievance hearing "no later than five (5) business days after the date Complainant receives the summary of discussion" [from the informal settlement conference]. (ACOP, 20.5, p. 60). These limitations are

unreasonable, particularly for tenant who are disabled or who have difficulty in understanding the complicated nature of the grievance procedure.

Furthermore, the ACOP provision involving requests for informal settlement conferences is misleading, as it does not take into account that a large percentage of the requests for an informal settlement conference will likely be made following the tenant's receipt of a notice of termination of tenancy from the AHA. We suggest that the AHA adopt a change in the ACOP policy to allow a complainant ten (10) days after either receipt of a notice of termination of tenancy or the occurrence of the event giving rise to the grievance to make their grievance request for an informal settlement conference. We further suggest that the AHA adopt a similar change allowing a complainant ten (10) days after receipt of the summary of discussion from the AHA from an informal settlement conference to request a formal grievance hearing.

The Section 8 Administrative Plan does allow a participant ten (10) days to request an informal hearing in the event of a AHA notification to a participant concerning their rights in the Section 8 program. (Admin, 16.3(C)(2), p. 94) However, in order to best provide for participation in the hearing process, the policy should be clarified to reflect that a participant is granted ten (10) days from the date of receipt of the notification from the AHA.

Third, the time limit deadlines in the ACOP grievance policy (ACOP, 20.5, p. 60, VI (A), VII (A) and (B)) and Section 8 Administrative Plan (Admin, 16.3, pp. 92-97) do not contain the opportunity for the tenant to contend that he or she had good cause for missing the deadlines for requesting either an informal settlement conference or formal grievance hearing (Public Housing) or an informal hearing (Section 8). This lack of an opportunity to claim good cause violates due process and should be corrected to reflect an exception to the stated deadlines in the case of good cause shown by the complainant.

Fourth, the ACOP policy governing informal settlement conferences and formal grievance hearings (ACOP, 20.5, pp. 58-66) does not make clear that the grievance hearing will not be conducted by a Hearing Officer that made or contributed to the decision which precipitated the complainant requesting the grievance hearing. Therefore, this clarification should be made to the ACOP.

Fifth, the ACOP requires payment of rent due and payable as of the month preceding the month in which the complained of act or failure to act took place. The policy allows a waiver to be made only in cases of "extreme and undue hardship" (ACOP, 20.5, IX(A)(3), p. 62). However, the policy does not define the "extreme and undue hardship" in which the payment and escrow requirement is to be waived. The policy should include standards for determining "extreme and undue hardship" so as to not violate a complainant's right to due process.

Sixth, the ACOP and Section 8 Administrative Plan address documents which are available for review prior to hearings. The policy allows a complainant/participant access only to documents which are “directly relevant” to the hearing. (ACOP, 20.5, X.(A)(1), p. 63)(Admin, 16.3D(1)(a), p. 94) This will likely limit a complainant’s access to documents which the AHA will introduce as evidence in the hearing. To comply with due process requirement, tenants and participants must be given full access to any document regarding the subject of the hearing including documents which the AHA does not intend to introduce because these documents may likely exonerate the tenant. The ACOP and Section 8 Administrative Plan should be clarified to clearly state that a tenant has access to these documents.

Seventh, the ACOP and Section 8 Administrative Plan provide that the AHA will charge a complainant/participant for copies made for any AHA documents that are directly relevant to the hearing. (ACOP, 20.5, X.(A)(1), p. 63)(Admin, 16.3D(1)(a), p. 94). Our concern about the limitation of access to “directly relevant” documents is spelled out in the preceding paragraph. However, in addition, the policy does not state the amount of this copying fee. Based on the experiences of our clients, we believe the AHAs current policy is to charge \$.25 a copy. Although the federal regulations allow a housing authority to make copies at the family’s expenses, this means that only the actual expense of the copies can be charged to the family. This cost should be evaluated and the provision should be rewritten to limit the charge to the actual cost of the copies. More appropriate would be a decision by the AHA to eliminate completely the policy of charging a family for documents relating to their tenancy/participation. The financial burden to the AHA as an agency would be minimal as compared to the hardship to a low income tenant/participant to expend money for these documents.

Last, neither the ACOP nor the Section 8 Administrative Plan provide for interpreters for non-English speaking claimants and witnesses. Due process means that individuals have a right to be heard in administrative proceedings. (*See e.g. Goldberg v. Kelly*, 397 U.S. 254 (1970); *Memphis Light, Gas & Water Division v. Craft*, 436 U.S. 1 (1975).) The ACOP and the Section 8 Administrative Plan do provide generally that the AHA will “endeavor to have bilingual staff or access to people who speak language other than English” available. (ACOP, 3.0, p. 9)(Admin, 1.5, p. 7) However, they limit this service to the Spanish language and do not clearly spell out this right in their grievance procedures. The failure to provide for an interpreter can prevent tenants from presenting their cases and violates due process. The grievance procedures in both the ACOP and Section 8 Administrative plans should include a provision to assist all non-English speaking claimants and witnesses.

Thank you for your consideration of these comments. Please feel free to contact me if you have any questions or concerns at (630) 232-9415.

Sincerely,

Pauline R. Koffman
Staff Attorney

cc: Kelly Lambert, Soule & Bradtke

5. Additional Resident Advisory Board Recommendations

AURORA HOUSING AUTHORITY RESIDENT ADVISORY BOARD

COMPREHENSIVE AGENCY PLAN RECOMMENDATIONS

APRIL 1, 2000

Submitted by Rev. and Mrs. John L. Willis

Submitted on Monday November 15, 1999

**AURORA HOUSING AUTHORITY RESIDENT ADVISORY BOARD
COMPREHENSIVE AGENCY PLAN RECOMMENDATIONS (CAP)**

APRIL 1, 2000

Submitted by Rev. and Mrs. John L. Willis

**THE FOLLOWING RECOMMENDATIONS ARE BASED ON HUD AND AHA
MISSION STATEMENTS, GOALS, AND OBJECTIVES, HUD REGULATIONS, AND
DISCUSSIONS WITH RESIDENTS AT THE JERICHO CIRCLE HOUSING COMPLEX.
IT INCLUDES 16 RECOMMENDATIONS AND IS SEVEN (7) PAGES LONG.**

TOPIC: Display Locations for PHA Plans and Supporting
Documents. (p.1) AHA Comprehensive Agency Plan 2000
(CAP2)

RECOMMENDATION #1 PHA plans including attachments and supporting Documents be

**available for public inspection at PHA
developments / sites.**

RATIONALE: HUD encourages HA's to educate residents regarding HA policies, programs, rights and responsibilities. (24CFR 964.140(a)3). Making HA policies easily accessible and available to residents (who may not have transportation to the main office, or who may wish to spend a couple of minutes of their free time viewing policies) will allow residents to educate themselves as needed.

TOPIC: Priority Community Development Needs Assessment,
Public Service Needs (chart p. 5, CAP2).

RECOMMENDATION #2: Assess Transportation as major need.

RATIONALE: This is a resident identified need. Bus service to and from the Jericho Circle Housing Complex ends at approximately 6pm, so that after 6pm, transportation becomes impossible unless one has a car or enough money to pay cab fare. Many residents have voiced difficulty with getting to and from work, doctor's appointments, grocery stores, etc.

TOPIC: Housing Needs of Families on the Public Housing and Section 8
Tenant- Based Assistance Waiting List (p.7 CAP2)

**RECOMMENDATION #3 Reopen the Section 8 Waiting List at least once or more within the
5 year plan period.**

RATIONALE: A waiting period of five years potentially can place undue pressure and duress on the living space of families presently eligible for this program. The needs of these applicants and the demographic composition of their family unit have a potential of change that will directly effect their housing needs during this waiting period. The applicants are in need of adequate housing, and the section 8 program can fill that need in a timely manner if the complete turn around time from initial application to placement is shortened.

TOPIC: Housing Needs of Families on the Public Housing and Section 8
Tenant- Based Waiting List. (p 9CAP2) Strategy 1: Target
assistance to families at or below 50% of AML.

RECOMMENDATION #4: Adopt rent policies to support and encourage work.

RATIONALE: The present rent policy calls for rent calculation to be based on a proportion of eligible income from the household (30%). With an increase in family income an adjustment / increase in rent is presently the norm for

those who obtain viable employment. Further increase in income (\$50 and up) obtained through employment adversely effects the tenant and causes a psychosocial manifestation of hopelessness when attempting to cause or produce self determinant factors and lifestyles. By simply adopting a policy of a periodical rent freeze and/ or ceiling as motivation to obtain viable employment , this problem can become virtually a nonexistent factor.

TOPIC: Other Housing Needs and Strategies: Reasons for Selecting Strategies (p. 10, CAP2)

RECOMMENDATION #5: Allow selection of PHA Strategies to be influenced by results of consultation with residents and the Resident Advisory Boards.

RATIONALE: According to HUD “partnerships between residents and HA’s are essential components to building, strengthening and improving public housing. Strong partnerships are critical for creating positive changes in lifestyles thus improving the quality of life for public housing residents, and the surrounding community” (24CFR 964.14).

TOPIC: PHA Policies Governing Eligibility, Selection, and Admissions. A. Public Housing Eligibility (p 12, CAP2)

RECOMMENDATION #6: Perform criminal background checks on teenage members of household specifically related to gang and drug activity.

RATIONALE: With the utilization of screening methods as dictated by HUD regulations 24CFR and in conjunction with further input from residents council officers also instructed in and aware of the screening methods and processes on their specific complex level, the possibility of having forehand knowledge of potential problematic or problem oriented tenants will be greatly enhanced. Since prosecution of teenage minors for criminal activities cannot be used as a basis for termination of the lease per se it stands to reason that the preidentification of actual and potential teenage delinquents becomes imperative for the continued peace and safety of each complex community.

TOPIC: (4) Admission Preference (p. 14, CAP2)
b. Transfer policies:

RECOMMENDATION #7: The addition of underhoused residents of AHA to this list.

RATIONALE: The continued underhousing of a family unit could justifiably be argued as a failure to comply with the AHA mission statement. Continued overcrowding will cause physical stress on the building dynamics and structure. Prolonged structural stress from overcrowding will substantially increase the maintenance workload and also the amount of ambient and major repairs as per state board of health and local building code regulations. By placing the affected family in an adequate size residential unit, these factors will make housing a success in it’s mission

and keep maintenance cost down.

TOPIC: Capital Fund Program (p. 28, CAP2)

RECOMMENDATION #8: Provide education to residents regarding this program and allow/provide means for resident input regarding needs and potential capital improvements.

RATIONALE: Please refer to 24 CFR 964.135 Resident involvement in AHA Management and Operations and 24CFR 964.140 Resident Training.

TOPIC: Capital Grant Fund

RECOMMENDATION #9: Provide an itemized breakdown of expenditures to each complex/ site specific to that site.

RATIONALE: Please refer to 24 CFR 964. 135 and 140.

TOPIC: Capital Grant Fund: **The following recommendations, items(a) through (g) are recommendations expenditures of the Capital Grant Fund.**

RECOMMENDATION #10: (1) **For the Housing Complex known as Jericho Circle Residents recommend the following improvements.**
(a) **2 Air conditioning units to each townhouse unit, one on the upper level bedroom area and one on the main floor.**

RATIONALE: It is the mission of the AHA to “provide and maintain quality, affordable housing within a safe, stable environment ...” (p. 1, CAP2000) During summer months young children, infants and elderly are especially susceptible to heat exhaustion. These high risk groups are concentrated in Public housing and every year face the extreme heat of summer in discomfort and fear for their health and the health of their family members. Housing can be successful in their stated mission to provide safe, quality housing by heeding this recommendation which comes directly from it’s risks of it’s residents. This will also result in an increased resident/ customer satisfaction, a stated goal/ objective of the AHA. (p. 1, CAP2). It is further the stated goal of the AHA to improve the quality of assisted housing by rennovating or modernizing public housing units . (p. 1-2, CAP2) , (24CFR 964.135).

RECOMMENDATION: (b) **Surveillance cameras at strategic points throughout the complex.**

RATIONALE: Includes increased security and crime prevention. Many residents have reported reluctance in

reporting crime due to fear of retaliation. Surveillance cameras would provide irrefutable evidence of crimes and positive ID of suspects without risk / retaliation to residents. Also, it is likely that criminal activity will decrease due to the mere presence of cameras. This will serve to improved quality of life for residents due to decreased criminal/ gang activity and decreased anxiety/ concern over retaliation for reporting crimes. It also serves to aid housing in achieving it's stated goal/ objective of increased resident / customer satisfaction. (p. 1, CAP 2). Further it is the stated goal/ objective of the AHA to improve the living environment of the residents by implementing public housing security improvements. (p. 2 CAP2), (24 CFR 964.135)

RECOMMENDATION: (c) Replace existing white floor tile with brown or black.

RATIONALE: In light of AHA's housekeeping policy which states that floors must be kept swept and mopped, and the possibility of unannounced visits to inspect units, this places an unnecessary hardship on residents to try to keep white floors clean. There have been numerous resident complaints of having to mop floors up to 3 times per day. This will serve to increase resident / customer satisfaction, which is a stated goal/ objective of the AHA. (p. 1, CAP2), (24CFR964.135)

RECOMMENDATION: (d) Provide blinds or shades for windows.

RATIONALE: Blinds provide insulation and security, and will enhance the physical appearance of the complex. AHA's mission statement to provide quality affordable housing and AHA's goals of (1) increased customer satisfaction and (2) to implement public housing security improvements. (p. 1-2, CAP2) , (24CFR 964. 135)

RECOMMENDATION: (e) Paint interior of units every (2) years.

RATIONALE: Currently the AHA does not permit residents to paint their units nor does the AHA paint units. This means that residents are left with no other choice but to wash the paint off the walls and then suffer with what remains. This is in direct conflict with AHA's mission of providing quality housing. Residents of AHA request that units be painted at least every two years. By heeding this request of it's residents AHA will be succeeding in it's mission to provide quality affordable housing and working to achieve it's stated goals/ objectives of increased resident/ customer satisfaction and rennovating or modernizing public housing units. (p. 1-2, CAP2), (24CFR 964. 135).

RECOMMENDATION: (f) Replace storm doors on all units as needed.

RATIONALE: Currently AHA does not replace storm doors to units when door has become damaged and removed due to damage. Storm doors should be replaced for the following reasons... Storm doors provide insulation from the cold/ heat and enhances the physical appearance of the unit and building in general. Better insulation results in lower heating/ cooling bills for residents, and thereby increases the economic stability of residents. This recommendation serves to aid AHA in achieving it's mission to provide adequate, affordable, and quality housing to the residents that it serves, and to reach it's stated goals/ objectives of (1) increased resident/ customer satisfaction and, (2) renovate or modernize public housing units. (p. 1-2, CAP2) ,

(24CFR. 135).

RECOMMENDATION: (g) Concrete in or provide fencing at the SW corner of building #1413 Jericho Circle.

RATIONALE: This is a well known high traffic area for gang, drug or other illegal activity as reported by residents, also because of the increase foot traffic, grass does not grow which decreases the curb appeal of this building. Fencing off the area would serve as a security measure. Concreting in the grass area would enhance the curb appeal of the property. This will assist housing in reaching it's goals/ objectives to (1) implement security improvements and (2) renovate/ modernizing public housing units, increase customer satisfaction, and (3) implement public housing security improvements. (p.1-2, CAP2), (24CFR 964. 135).

TOPIC: Homeownership Program Administered by PHA (p. 33 CAP2).

RECOMMENDATION #11: **Implement homeownership programs for Public Housing Residents.**

RATIONALE: Programs such as these ensure that residents receive the assistance needed to become homeowners, thereby decreasing the need for public housing assistance. Since the AHA mission is "...as a temporary helping hand.." (p.1, CAP2) "and to promote self-sufficiency programs and initiatives for the residents we serve to enhance their lives and improve opportunities for upward mobility and independent lifestyles." (p. 1, CAP2) and since these types of programs are requested by the residents it serves, it stands to reason that such programs should be implemented and can only aid AHA in achieving it's goals/ objectives.

TOPIC: PHA Community Service and Self Sufficiency Programs
(1) General (a) Self Sufficiency Policies (p.36-37, CAP2)

RECOMMENDATION #12: **Allow eligibility and give preference for Public Housing Residents to participate in the homeownership option.**

RATIONALE: As stated for the previous recommendation.

TOPIC: (b) Economic and Social Self Sufficiency Programs .
(p.36-37 CAP2)

RECOMMENDATION #13: **Establish Self Sufficiency Programs for Public Housing Residents.**

RATIONALE: It is the mission of the Aurora Housing Authority to promote “...educational, employment, economic development and self- sufficiency programs and initiatives for residents..”
(p. 1, CAP2).

TOPIC: PHA Safety and Crime Prevention Measures (p.38,CAP2)
1. Need for Measures to ensure the Safety of Public Housing Residents.
2. What information or data did the PHA use to determine the need for PHA actions to improve safety of residents ?

RECOMMENDATION #14: **Develop and utilize a safety and security survey of residents including the opportunity to give input and evaluate the community oriented policing program.**

RATIONALE: Many residents have verbalized the desire to give input and to affect this area. Also there have been numerous complaints regarding the cop program. This will aid housing in reaching it’s stated goal to increase customer satisfaction. (p. 1, CAP2).

TOPIC: Crime and drug Prevention activities the PHA has undertaken or plans to undertake in the next PHA fiscal year. (p. 38, CAP2)

RECOMMENDATION #15: (1) **Contract with the resident organization for the provision of crime and/ or drug prevention activities.**
(2) **Install Surveillance cameras at strategic points throughout complex.**
(3) **Install security system at the community center.**
(4) **Allow residents to install security systems in their homes/ units.**

RATIONALE: Each of these recommendations will move the AHA closer to achieving their stated mission to “...provide quality, affordable housing within a safe, stable environment...” and to achieve their stated goals of (1) increased customer satisfaction and (2) implement public housing security improvements..(p. 1-2, CAP2) Residents of the Jericho Circle Housing Complex have specifically requested these measures based on their own unique circumstances.

TOPIC: Other Information
Description of Election process for Residents on PHA Board.
(p 41, CAP2)

RECOMMENDATION #16: Educate residents regarding the election process and elect residents to the AHA Board of Directors.

RATIONALE: HUD encourages HA's to educate residents regarding HA policies, programs, rights and responsibilities. (24CFR 964. 140 (a)3). HUD further " promotes resident participation and the active involvement of residents in all aspects of a HA's overall mission and operation". (24CFR 964. 11).

**PHA Plan
Table Library**

**Component 7
Capital Fund Program Annual Statement
Parts I, II, and II**

**Annual Statement
Capital Fund Program (CFP) Part I: Summary**

Line No.	Summary by Development Account	Total Estimated Cost
1	Total Non-CGP Funds	0
2	1406 Operations	80,000
3	1408 Management Improvements	25,000
4	1410 Administration	131,187
5	1411 Audit	0
6	1415 Liquidated Damages	0
7	1430 Fees and Costs	115,000
8	1440 Site Acquisition	0
9	1450 Site Improvement	30,000
10	1460 Dwelling Structures	820,691
11	1465.1 Dwelling Equipment-Nonexpendable	20,000
12	1470 Nondwelling Structures	0
13	1475 Nondwelling Equipment	40,000
14	1485 Demolition	0

15	1490 Replacement Reserve	0
16	1492 Moving to Work Demonstration	0
17	1495.1 Relocation Costs	50,000
18	1498 Mod Used for Development	0
19	1502 Contingency	0
20	Amount of Annual Grant (Sum of lines 2-19)	1,311,878
21	Amount of line 20 Related to LBP Activities	265,176
22	Amount of line 20 Related to Section 504 Compliance	0
23	Amount of line 20 Related to Security	10,000
24	Amount of line 20 Related to Energy Conservation Measures	500,000

Annual Statement

Capital Fund Program (CFP) Part II: Supporting Table

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
Agency Wide	- Operations	1406	80,000
IL90-1 Maple Terrace	- A &E Fees	1430	50,000
	- Replace water piping supply system - 1 building	1460	500,000
	- Relocation (90 residents)	1495	50,000
IL90-3,4,5 & 6 Jericho Circle, Eastwood, Indian Trail, Southwind, Centennial House & Centennial House	- Exterior and major system & Replacement/repairs	1460	120,515
	- Landscaping 401 units 6 sites	1450	30,000

Annex			
IL90-7,8& 9	- A&E Fees/project rep/testing Scattered Sites	1430	65,000
	- LBP Abatement 40 units	1460	200,176
	- Exterior and major system replacement/repairs 40 units		
Agency Wide	Management Improvements	1408	25,000
	- Staff training to administer Comp Grant Program and training to sustain management and physical improvements		
	14 persons		
	- Administration 2 persons	1410	131,187
	- Non-Dwelling Equipment - Appliances	1465	20,000
	- Non Dwelling Equipment	1475	40,000
	Total		1,311,878

Annual Statement

Capital Fund Program (CFP) Part III: Implementation Schedule

Development Number/Name HA-Wide Activities	All Funds Obligated (Quarter Ending Date)	All Funds Expended (Quarter Ending Date)
IL06-PO90-001	12-30-2000	6-30-2002
IL06-PO90-003	12-30-2000	6-30-2002
IL06-PO90-004	12-30-2000	6-39-2002
IL06-PO90-005	12-30-2000	6-30-2002
IL06-PO90-006	12-30-2000	6-30-2002
IL06-PO90-007	12-30-2000	6-30-2002
IL06-PO90-008	12-30-2000	6-30-2002

IL06-PO90-009

12-30-2000

6-30-2002

Agency Wide

12-30-2000

9-30-2002

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Optional Table for 5-Year Action Plan for Capital Fund (Component 7)

Complete one table for each development in which work is planned in the next 5 PHA fiscal years. Complete a table for any PHA-wide physical or management improvements planned in the next 5 PHA fiscal year. Copy this table as many times as necessary. Note: PHAs need not include information from Year One of the 5-Year cycle, because this information is included in the Capital Fund Program Annual Statement.

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
IL06-PO90-001	Maple Terrace	81	44%	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
IL90-1 Maple Terrace				
- FY 2000			\$680,000	2000 Year 1
- A&E Fees Site wide 1430			\$ 10,000	2001 Year 2
- Exterior, interior and major system replacement/repairs 2 buildings 1460			\$ 50,000	2001
- Landscape improvements Site wide 1450			\$ 30,000	2001
- Exterior, interior and major system replacement/repairs 2 buildings 1460			\$ 20,000	2002 Year 3
- A&E			\$ 5,000	
- Exterior, interior and major system replacement/repairs 2 buildings 1460			\$ 50,000	2003 Year 4
- Exterior, interior and major system replacement/repairs 2 buildings 1460			\$ 40,000	2004 Year 5
- Replace appliances 1465			\$ 20,000	2004
Total estimated cost over next 5 years			\$905,000	

Optional 5-Year Action Plan Tables			
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development
IL06-PO90-003	Jericho Circle	19	13%
Description of Needed Physical Improvements or Management Improvements		Estimated Cost	Planned Start Date (HA Fiscal Year)
IL90-3 Jericho Circle			
- FY2000		\$ 45,000	2000 Year 1
- Exterior, interior and major system replacement/repairs - 146 units 1460		\$ 41,515	2001 Year 2
- Exterior, interior and major system replacement/repairs - 146 units 1460		\$ 20,000	2002 Year 3
- A&E		\$ 5,000	2003 Year 4
- Exterior, interior and major system replacement/repairs - 146 units 1460		\$ 50,000	2003
- Exterior, interior and major system replacement/repairs - 146 units 1460		\$ 40,000	2004 Year 5
- Appliance replacement		\$ 30,000	2004
Total estimated cost over next 5 years		\$231,515	

Optional 5-Year Action Plan Tables			
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development
IL06-PO90-004	Eastwood, Southwind and Indian Trail	48	37.5%
Description of Needed Physical Improvements or Management Improvements		Estimated Cost	Planned Start Date (HA Fiscal Year)
IL90-4 Eastwood, Southwind & Indian Trail			
- FY 2000		\$45,000	2000 Year 1
- A&E Fees 15 units 1430		\$ 30,000	2001 Year 2
- Modernization Update 15 units 1460/1465		\$350,000	2001
- Landscaping 3 Sites 1450		\$ 35,000	2001
- A&E Fees 1430		\$ 30,000	2002 Year 3
- Modernization Update 15 units 1460/1465		\$669,691	2002
- A&E Fees 1430		\$ 35,000	2003 Year 4
- Modernization Update 24 units 1460/1465		\$534,421	2003
- A&E Fees 1430		\$ 35,000	2004 Year 5
- Modernization Update 24 units 1460/1465		\$335,421	2004
Total estimated cost over next 5 years		\$2,099,533	

Optional 5-Year Action Plan Tables			
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development
IL06-PO90-005	Centennial House	3	96.3%
Description of Needed Physical Improvements or Management Improvements		Estimated Cost	Planned Start Date (HA Fiscal Year)
IL90-5			
- FY 2000		\$ 35,000	2000 Year 1
- A&E Fees - replace parking lot/landscaping 1430		\$ 15,000	2001 Year 2
- Replace parking lot/landscaping 1450		\$150,000	2001
- Replace 1 W/H's 1460		\$ 10,000	2001
- Replace 1 W/H's 1460		\$ 8,000	2002 Year 3
- Exterior, interior and major system replacement/repairs - 1460		\$ 30,000	2003 Year 4
- Exterior, interior and major system replacement/repairs - 1460		\$ 50,000	2004 Year 5
Total estimated cost over next 5 years		\$298,000	

Optional 5-Year Action Plan Tables

Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
IL06-PO90-006	Centennial House Annex	0	0	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
IL90-6				
- FY 2000			\$ 25,515	2000 Year 1
- A&E Fees - replace parking lot/landscaping 1430			\$ 10,000	2001 Year 2
- Replace parking lot/landscaping 1450			\$140,000	2001
- Replace 1 W/H's 1460			\$ 10,000	2001
- Replace 1 W/H's 1460			\$ 8,000	2002 Year 3
- Exterior, interior and major system replacement/repairs - 1460			\$ 2 0,000	2003 Year 4
- Exterior, interior and major system replacement/repairs - 1460			\$ 50,000	2004 Year 5
Total estimated cost over next 4 years			\$263,515	

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
IL06-PO90-007	Scattered Site	0	0	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
IL06-PO90-007 Scattered Site				
- FY 2000			\$180,176	2000 Year 1
- A&E Fees			\$ 2,000	2001 Year 2
- Exterior, interior and major system replacement/repairs 1460/1465			\$ 40,000	2001
- Landscape & site improvements 1450			\$ 10,000	2001
-A&E Fees			\$ 18,000	2002 Year 3
- Exterior, interior and major system replacement/repairs 1460/1465			\$170,000	2002
-A&E Fees			\$ 4,000	2003 Year 4
- Exterior, interior and major system replacement/repairs 1460/1465			\$ 40,000	2003
- Exterior, interior and major system replacement/repairs 1460/1465			\$ 15,000	2004 Year 5
- Landscape & site improvements 1450			\$ 50,000	2004
Total estimated cost over next 5 years			\$529,176	

Optional 5-Year Action Plan Tables

Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
IL06-PO90-008	Scattered Site	6	14%	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
IL06-PO90-008 Scattered Site				
- FY 2000			\$ 85,000	2000 Year 1
- A&E Fees			\$ 8,000	2001 Year 2
- Exterior, interior and major system replacement/repairs 1460/1465			\$ 90,000	
- Landscape & site improvements 1450			\$ 45,176	
-A&E Fees				
- Exterior, interior and major system replacement/repairs 1460/1465			\$ 12,000	2002 Year 3
			\$140,000	2002
-A&E Fees				
- Exterior, interior and major system replacement/repairs 1460/1465			\$ 21,000	2003 Year 4
			\$271,270	2003
- A&E Fees				
- Exterior, interior and major system replacement/repairs 1460/1465			\$ 26,270	2004 Year 5
- Landscape & site improvements 1450			\$285,000	2004
			\$ 50,000	2004
Total estimated cost over next 5 years			\$1,033,716	

Optional 5-Year Action Plan Tables			
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development
IL06-PO90-009	Scattered Sites	0	0
Description of Needed Physical Improvements or Management Improvements		Estimated Cost	Planned Start Date (HA Fiscal Year)
IL06-PO90-009 Scattered Site - A&E Fees - Exterior, interior and major system replacement/repairs 1460/1465 - Landscape & site improvements 1450 - Exterior, interior and major system replacement/repairs 1460/1465 - Exterior, interior and major system replacement/repairs 1460/1465 - A&E Fees - Exterior, interior and major system replacement/repairs 1460/1465 - Landscape & site improvements 1450		\$ 1,000 \$ 20,000 \$ 8,000 \$ 20,000 \$ 30,000 \$ 4,000 \$ 50,000 \$ 25,000	2001 Year 2 2001 2001 2002 Year 3 2003 Year 4 2004 Year 5 2004 2004
Total estimated cost over next 5 years		\$158,000	

Optional 5-Year Action Plan Tables			
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development

IL06-PO90	Agency Wide		
Description of Needed Physical Improvements or Management Improvements		Estimated Cost	Planned Start Date (HA Fiscal Year)
Agency Wide Improvements			
- FY2000		\$ 216,187	2000 Year 1
- Management Improvements 1408		\$ 25,000	2001 Year 2
- Administration 1410		\$131,187	2001
- Non-Dwelling Equipment 1475		\$ 50,000	2001
- Management Improvements 1408		\$ 25,000	2002 Year 3
- Administration 1410		\$131,187	2002
- Non-Dwelling Equipment 1475		\$ 40,000	2002
- Management Improvements 1408		\$ 25,000	2003 Year 4
- Administration 1410		\$131,187	2003
- Non-Dwelling Equipment 1475		\$ 60,000	2003
- Management Improvements 1408		\$ 25,000	2004 Year 5
- Administration 1410		\$131,187	2004
- Non-Dwelling Equipment 1475		\$ 50,000	2004
Total estimated cost over next 5 years		\$1,040,935	

Public Housing Drug Elimination Program Plan

Note: THIS PHDEP Plan template (HUD 50075-PHDEP Plan) is to be completed in accordance with Instructions located in applicable PIH Notices.

Annual PHDEP Plan Table of Contents:

1. General Information/History
2. PHDEP Plan Goals/Budget
3. Milestones
4. Certifications

Section 1: General Information/History

A. Amount of PHDEP Grant \$144,721

B. Eligibility type (Indicate with an "x") N1_____ N2_____ R X_____

C. FFY in which funding is requested FY2000

D. Executive Summary of Annual PHDEP Plan

In the space below, provide a brief overview of the PHDEP Plan, including highlights of major initiatives or activities undertaken. It may include a description of the expected outcomes. The summary must not be more than five (5) sentences long

The Aurora Housing Authority (AHA) will use FY2000 PHDEP funds to continue ongoing successful strategies that have proven effective in reducing drug-related and violent crime in and around the five public housing target sites in Aurora, Illinois. These sites include Jericho Circle, Eastwood, Southwind, Indian Trail and Maple Terrace. Major activities that will directly benefit approximately 1400 residents include installing security lights, fencing and entry door camera monitoring systems, site reconfiguration, additional law enforcement services including community policing officer (COP) dedicated patrols combined with educational, recreational, cultural, sports youth activities and drug education, prevention and counseling programs for young residents and adults. Activities, programs and crime reduction strategies are developed through a partnership process with residents, resident councils, local COP officers and AHA staff.

E. Target Areas

Complete the following table by indicating each PHDEP Target Area (development or site where activities will be conducted), the total number of units in each PHDEP Target Area, and the total number of individuals expected to participate in PHDEP sponsored activities in each Target Area.

PHDEP Target Areas (Name of development(s) or site)	Total # of Units within the PHDEP Target Area(s)	Total Population to be Served within the PHDEP Target Area(s)
Jericho Circle	146	700
Eastwood	58	300
Indian Trail	36	160
Southwind	34	125
Maple Terrace	186	186

F. Duration of Program

Indicate the duration (number of months funds will be required) of the PHDEP Program proposed under this Plan (place an “x” to indicate the length of program by # of months. For “Other”, identify the # of months).

6 Months _____ 12 Months _____ 18 Months _____ 24 Months X Other _____

G. PHDEP Program History

Indicate each FY that funding has been received under the PHDEP Program (place an “x” by each applicable Year) and provide amount of funding received. If previously funded programs have not been closed out at the time of this submission, indicate the fund balance and anticipated completion date. For grant extensions received, place “GE” in column or “W” for waivers.

Fiscal Year of Funding	PHDEP Funding Received	Grant #	Fund Balance as of Date of this	Grant Extensions	Anticipated Completion
FY 1995					

FY 1996 X	\$250,000	IL06DEP09001-96	0	N/A	Completed
FY 1997 X	\$197,100	IL06DEP09001-97	0	N/A	Completed
FY1998 X	\$197,400	IL06DEP09001-98	\$141,630	N/A	9-30-2000
FY 1999 X	\$144,721	IL06DEP09001-99	\$144,721	N/A	9-30-2001

Section 2: PHDEP Plan Goals and Budget

A. PHDEP Plan Summary

In the space below, summarize the PHDEP strategy to address the needs of the target population/target area(s). Your summary should briefly identify: the broad goals and objectives, the role of plan partners, and your system or process for monitoring and evaluating PHDEP-funded activities. This summary should not exceed 5-10 sentences.

The four main strategies that have been effective in reducing drug-related crime at our sites include:

- Physical security enhancements designed to improve the overall security of the target sites;
- Increased law enforcement presence at peak criminal times intended to arrest persons involved with drug-related and other criminal activities, reduce the number of uninvited persons from congregating at the sites and increase the safety and security of the sites; and
- Educational, cultural, recreational and sports programs, as well as drug education classes and other activities to provide productive alternatives for younger residents to drug-related crime and gangs.

The broad goals and objectives of the PHDEP strategy are to reduce drug-related and violent crime in and around the five target sites, increase resident involvement and participation in reporting and maintaining crime reduction efforts and enhancing the overall quality of life for residents and the surrounding community by creating a safe and stable environment for them to live in.

All activities, programs and crime reduction strategies are developed through a partnership process with residents, resident councils, local COP officers and AHA staff.

Program monitoring and evaluation will be based on information and crime statistics provided by the Aurora Police Department, resident participation and satisfaction in activities and programs, reduction in vandalism, etc.. Goals will be assessed by percentage of reduction in crime and vandalism and increase in resident participation.

B. PHDEP Budget Summary

Enter the total amount of PHDEP funding allocated to each line item.

FY 2000 PHDEP Budget Summary	
Budget Line Item	Total Funding
9110 - Reimbursement of Law Enforcement	\$ 40,000
9120 - Security Personnel	0
9130 - Employment of Investigators	0
9140 - Voluntary Tenant Patrol	0
9150 - Physical Improvements	\$ 50,000
9160 - Drug Prevention	\$ 10,000
9170 - Drug Intervention	0
9180 - Drug Treatment	0
9190 - Other Program Costs	\$ 44,721
TOTAL PHDEP FUNDING	\$144,721

1. PHDEP Plan Goals and Activities

In the tables below, provide information on the PHDEP strategy summarized above by budget line item. Each goal and objective should be numbered sequentially for each budget line item (where applicable). Use as many rows as necessary to list proposed activities (additional rows may be inserted in the tables). PHAs are not required to provide information in shaded boxes. Information provided must be concise—not to exceed two sentences in any column. Tables for line items in which the PHA has no planned goals or activities may be deleted.

Budget Line Item	PHDEP Strategy
9110 - Reimbursement of Law Enforcement	Total PHDEP Funding: \$40,000

Goal(s)							
Objectives							
Proposed Activities	# of Persons Served	Target Population	Start Date	Expected Complete Date	PHEDEP Funding	Other Funding (Amount/Source)	Performance Indicators
1. Directed patrols/safety checks/special details. Objectives: Reduction of drug-related and violent criminal activity in and around target sites/reduced vandalism/ increased resident safety and security			12-2000	12-2002	\$18,000	\$ 2,000 AHA staff time	- reduce drug-related and violent crime by 3% over prior year; - increase number of arrests made by the Aurora Police Department by 2%; - reduce AHA owned property vandalism by 3% dollar value over prior year; - increase resident's perception of safety, security and reduction of drug-related and violent crime by 3% over prior year; and - improve the overall perception of public housing by the Aurora community by 2% over prior year.
2. Community Oriented Police activities/efforts to improve resident relations and participation . Objectives: Increased resident participation and empowerment in reducing crime and taking ownership			12-2000	12-2002	\$20,000	\$ 1,000 AHA staff time	- reduce drug-related and violent crime by 3% over prior year; - increase number of arrests made by the Aurora Police Department by 2%; - reduce AHA owned property vandalism by

of site/increased resident role in reporting drug-related and violent criminal activity in and around target sites/reduced vandalism/ increased resident safety and security							3% dollar value over prior year; - increase resident's perception of safety, security and reduction of drug-related and violent crime by 3% over prior year;- reduce uninvited persons from congregating at sites by 4%; - reduce the number of calls for service by 2% over prior year; and - improve the overall perception of public housing by the Aurora community by 2% over prior year.
3.Strategy Coordination Meetings/court time/ providing statistical crime data. Objectives: Increased cooperation between AHA and APD/exchange of crime data/police reports/UCR data, etc.			12-2000	120-2002	\$ 2,000	\$ 2,000	Improve existing strategies to reduce drug related and violent crime, develop new strategies and improve tracking of statistics, exchange of information, etc..

9120 - Security Personnel		Total PHDEP Funding: \$ 0
Goal(s)		
Objectives		

Proposed Activities	# of Persons Served	Target Population	Start Date	Expected Complete Date	PHEDEP Funding	Other Funding (Amount /Source)	Performance Indicators
1.							
2.							
3.							

9130 - Employment of Investigators	Total PHEDEP Funding: \$ 0
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Goal(s)	
Objectives	

Proposed Activities	# of Persons Served	Target Population	Start Date	Expected Complete Date	PHEDEP Funding	Other Funding (Amount /Source)	Performance Indicators
1.							
2.							
3.							

	Total PHEDEP Funding: \$ 0
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9140 - Voluntary Tenant Patrol							
Goal(s)							
Objectives							
Proposed Activities	# of Persons Served	Target Population	Start Date	Expected Complete Date	PHEDEP Funding	Other Funding (Amount /Source)	Performance Indicators
1.							
2.							
3.							

9150 - Physical Improvements	Total PHEDEP Funding: \$
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Goal(s)							
Objectives							
Proposed Activities	# of Persons Served	Target Population	Start Date	Expected Complete Date	PHEDEP Funding	Other Funding (Amount /Source)	Performance Indicators
1. Install exterior security lights at 5 sites . Objectives: Reduction of drug-related and violent			12-2000	12-2002	\$20,000	\$1,500 AHA staff time	reduce drug-related and violent crime by 3% over prior year; - reduce the number of

criminal activity in and around target sites/reduced vandalism/ increased resident safety and security							calls for police service by 3% over prior year; - increase number of arrests made by the Aurora Police Department by 2% (due to increased visibility provided by security lights); - reduce vandalism to AHA owned property by 5% dollar value over prior year; - reduce criminal damage to resident's property by 4% over prior year; - reduce the presence of uninvited persons by 4% over the prior year;
2.Install security fencing at 3 sites. Objectives: Reduction of drug-related and violent criminal activity in and around target sites/reduced vandalism/ increased resident safety and security			12-2000	12-2002	\$15,000	\$1,000 AHA staff time	reduce drug-related and violent crime by 3% over prior year; - increase number of arrests made by the Aurora Police Department by 4%; - reduce the presence of uninvited persons by 4% over the prior year;
3.Install security cameras and video monitoring system at 1 site (4 locations). Objectives: Reduction of drug-related and violent criminal activity in and around target sites/reduced vandalism/			12-2000	12-2002	\$ 5,000	\$ 500 AHA staff time	- reduce drug-related and violent crime by 3% over prior year; - reduce the number of calls for police service by 4% over prior year; - increase resident's perception of safety,

increased resident safety and security							security and reduction of drug-related and violent crime by 3% over prior year; - increase number of arrests made by the Aurora Police Department by 4%; - reduce vandalism to AHA owned property by 3% dollar value over prior year; and - reduce the presence of uninvited persons by 3% over the prior year.
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9160 - Drug Prevention	Total PHDEP Funding: \$10,000
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Goal(s)							
Objectives							
Proposed Activities	# of Persons Served	Target Population	Start Date	Expected Complete Date	PHDEP Funding	Other Funding (Amount /Source)	Performance Indicators
1. Drug education/ prevention classes at 3 target sites on a weekly or semi-weekly basis/ provide access to counseling services for other drug-related problems. Objectives:	125-250	young residents & interested adult residents	12-2000	12-2002	\$ 10,000	\$ 1,000 AHA staff time	increase resident participation in drug education classes by 4% over prior year; - increase resident awareness of the health hazards and legal ramifications of illegal

<p>coordinate drug education, drug prevention and other counseling services/ distribute drug education information/ provide classes on substance abuse, hoe to avoid peer pressure, etc./ increase resident accessibility to drug counseling and treatment services/ provide services designed for youth and adult substance abusers (i.e., prenatal care and postpartum care, family and individual counseling services, domestic violence counseling, parenting classes, anger management, conflict resolution, etc./ reduce drug-related crime in and around in and around the target sites.</p>							<p>drug use by 3% over prior year; - increase young resident's desire and ability to avoid peer pressure to use illegal drugs; and - influence young residents to totally avoid illegal drug usage (increase 1% over prior year).</p>
2.							
3.							

9170 - Drug Intervention	Total PHDEP Funding: \$ 0
Goal(s)	

Objectives							
Proposed Activities	# of Persons Served	Target Population	Start Date	Expected Complete Date	PHDEP Funding	Other Funding (Amount /Source)	Performance Indicators
1.							
2.							

9180 - Drug Treatment

Total PHDEP Funding: \$ 0

Goal(s)							
Objectives							
Proposed Activities	# of Persons Served	Target Population	Start Date	Expected Complete Date	PHDEP Funding	Other Funding (Amount /Source)	Performance Indicators
1.							
3.							

9190 - Other Program Costs

Total PHDEP Funds: \$44,721

Goal(s)							
Objectives							
Proposed Activities	# of Persons Served	Target Population	Start Date	Expected Complete Date	PHDEP Funding	Other Funding (Amount /Source)	Performance Indicators
1.Youth Activities: Summer, after school and weekend programs include educational, recreational and cultural activities, as well as some semi-			12-2000	12-2002	\$15,721	\$ 4,500 AHA staff time	- reduce drug-related and violent crime involving young residents by 3% over prior year;- reduce gang involvement and association by young

<p>structured sports activities. Objectives: develop self confidence and a strong sense of self worth; develop leadership skills; positive alternative to illegal drugs and gangs; experience new and different ideas, surroundings and viewpoints in order to demonstrate that there are many opportunities available for those that stay in school, work hard and avoid drug-related crime.</p>							<p>residents 2% over prior year- increase resident participation in various activities and programs by 3% over prior year; and - improve school attendance and performance by young residents by 2% over prior year.</p>
<p>2.Computer Lab: training, equipment and support. Objectives: basic and advanced computer training on model equipment and current business software will provide participants with work skills.</p>			12-2000	12-2002	\$12,500	\$ 1,000 AHA staff time	<p>- reduce drug-related and violent crime involving young residents by 3% over prior year; - reduce gang involvement and association by young residents 2% over prior year; and - increase employability of residents involved in employment type programs by 2% over prior year;</p>
<p>3.Art, dance and music classes. Objectives: positive alternative to illegal drugs and gangs; develop self confidence</p>			12-2000	12-2002	\$ 1,000		<p>- reduce drug-related and violent crime involving young residents by 3% over prior year; - reduce gang</p>

and a strong sense of self worth.							involvement and association by young residents 2% over prior year - increase resident participation in various activities and programs by 3% over prior year;
4. After school homework program. Objectives: positive alternative to illegal drugs and gangs; many young resident need assistance and quiet, structured location to complete homework, improve school attendance and performance.			12-2000	12-2002	\$ 500		- reduce drug-related and violent crime involving young residents by 3% over prior year; - reduce gang involvement and association by young residents 2% over prior year; and - improve school attendance and performance by young residents by 2% over prior year.
5. Saturday sports program/other activities. Objectives: positive alternative to illegal drugs and gangs; develop self confidence and a strong sense of self worth; develop leadership skills.			12-2000	12-2002	\$ 2,000		- reduce drug-related and violent crime involving young residents by 3% over prior year; - reduce gang involvement and association by young residents 2% over prior year; and - increase resident participation in various activities and programs by 3% over prior year;
6. Reading club. Objectives: positive			12-2000	12-2002	\$ 500		- reduce drug-related and violent crime involving

alternative to illegal drugs and gangs; develop self confidence and a strong sense of self worth; develop leadership skills.							young residents by 3% over prior year; - reduce gang involvement and association by young residents 2% over prior year;- increase young resident involvement in activities and programs outside their site by 2% over prior year; and - improve school attendance and performance by young residents by 2% over prior year.
7. Summer sports programs. Objectives: positive alternative to illegal drugs and gangs; develop self confidence and a strong sense of self worth; develop leadership skills.			12-2000	12-2002	\$ 5,000		- reduce drug-related and violent crime involving young residents by 3% over prior year; - reduce gang involvement and association by young residents 2% over prior year, and - increase resident participation in various activities and programs by 3% over prior year.
8. Mentoring program/job training skills. Objectives: experience new and different ideas, surroundings and viewpoints; illegal drugs and gangs; develop self			12-2000	12-2002	\$ 2,500	\$1,000	- reduce drug-related and violent crime involving young residents by 3% over prior year; - reduce gang involvement and

<p>confidence and a strong sense of self worth; develop leadership skills; provide working, educated positive male and female role models that can show there are other ways to live besides joining a gang, doing drugs and dropping out of school</p>							<p>association by young residents 2% over prior year;- increase resident participation in various activities and programs by 3% over prior year;- increase young resident involvement in activities and programs outside their site by 2% over prior year; and improve school attendance and performance by young residents by 2% over prior year.</p>
<p>9. Resident Council drug education/prevention/ youth activities. Objectives: Provide opportunities for resident councils to develop and implement various programs for residents to reduce drug related and violent crime in and around public housing sites.</p>			12-2000	12-2002	\$ 5,000		<p>- reduce drug-related and violent crime involving young residents by 3% over prior year; - reduce gang involvement and association by young residents 2% over prior year - increase resident participation in various activities and programs by 3% over prior year;</p>

Section 3: Expenditure/Obligation Milestones

Indicate by Budget Line Item and the Proposed Activity (based on the information contained in Section 2 PHDEP Plan Budget and Goals), the % of funds that will be expended (at least 25% of the total grant award) and obligated (at least 50% of the total grant award) within 12 months of grant execution.

Budget Line Item #	Expenditure of Total Grant Funds By Activity #	Total PHDEP Funding Expended (sum of the activities)	50% Obligation of Total Grant Funds by Activity #	Total PHDEP Funding Obligated (sum of the activities)
<i>e.g Budget Line Item # 9120</i>	<i>Activities 1, 3</i>		<i>Activity 2</i>	
9110	Activities 1,2 & 3	\$10,000	Activities 1, 2 & 3	\$20,000
9120				
9130				
9140				
9150	Activities 1, 2 & 3	\$ 15,000	Activities 1,2 & 3	\$25,000
9160	Activity 1	\$ 2,500	Activity 1	\$ 5,000
9170				

9180				
9190	Activities 1-9	\$12,000	Activities 1-9	\$22,500
TOTAL		\$39,500		\$72,500

Section 4: Certifications

A comprehensive certification of compliance with respect to the PHDEP Plan submission is included in the “PHA Certifications of Compliance with the PHA Plan and Related Regulations.”

Other required certification forms will be submitted by mail to the HUD Chicago Field Office.