

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**

HUD 50075
OMB Approval No: 2577-0226
Expires: 03/31/2002

PHA Plan Agency Identification

PHA Name: Ann Arbor Housing Commission

PHA Number: MI064

PHA Fiscal Year Beginning: (mm/yyyy) 07/2000

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.
- The PHA's mission is: (state mission here)

The mission of the Ann Arbor Housing Commission is to provide desirable, affordable housing by building cohesive residential communities, creating an atmosphere of pride and developing an environment that fosters responsibility and accountability while cultivating a partnership between Ann Arbor Housing Commission staff, residents, the Commission Board and the community.

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 these measures in the spaces to the right of or below the stated objectives.

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: Increase Vouchers by 25% of current allocation
 - Reduce public housing vacancies: Reduce vacancies to 3% or not more than 10 units
 - Leverage private or other public funds to create additional housing opportunities:
 - Acquire or build units or developments

- ✓ Other (list below) Explore bonding capacity and creating of a 501(C)(3)

- ✓ PHA Goal: Improve the quality of assisted housing
 - Objectives:
 - ✓ Improve public housing management: (PHAS score)
 - ✓ Improve voucher management: (SEMAP score)
 - ✓ Increase customer satisfaction: Improve communication through new resident orientation, on-site maintenance training, regular newsletter issuance. Improve timelines of telephone and work order response. Expanded development of resident councils and/or new resident advisory board.
 - ✓ Concentrate on efforts to improve specific management functions: Develop a more stable revenue stream; ability to provide consistent oversight to Section 8 program including review of files, applicant selection, and HQS inspections.
 - ✓ Renovate or modernize public housing units: Continue through CGP
 - 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 – Continue Section 8 workshop series begun in December 1999; speak to apartment owners groups; seek additional landlord participation.
 - ✓ Increase voucher payment standards – Conduct an analysis to consider increasing standards to 105% of the FMR to increase lease up success especially for one bedroom Voucher holders.
 - Implement voucher homeownership program:
 - ✓ Implement public housing or other homeownership programs: - Consider the use of 5% of current allocation as a pilot program (up to 50 Vouchers) as a homeownership option.
 - 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: Establish working family preference in the selection of tenants and implementation of flat rent to encourage retention of working families.
 - 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: Continue Community Policing activities, continue police in residence program and upgrade building security especially to elderly/disabled buildings.
 - Designate developments or buildings for particular resident groups (elderly, persons with disabilities)
 - ✓ Other: (list below) Enhance site appearance through new or improved signage, landscaping and trash management.

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

- ✓ PHA Goal: Promote self-sufficiency and asset development of assisted households
Objectives:
 - ✓ Increase the number and percentage of employed persons in assisted families: Adoption of working family preference
 - ✓ Provide or attract supportive services to improve assistance recipients' employability: Welfare-to-Work Voucher allocation and Welfare-to-Work Top Grant
 - ✓ Provide or attract supportive services to increase independence for the elderly or families with disabilities. Continue to seek HUD and other funding for supportive services. Access local universities for student interns in the areas of occupational and physical therapy, social work and urban planning.
 - ✓ Other: (list below) Enhancement of community centers, including computer lab with Internet hook-up and increased on-site services.

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: Ongoing activity
- ✓ 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: Ongoing activity
- Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required: Already in compliance with 504 needs assessment; waiting list does not indicate a need for additional accessible units.
- ✓ Other: (list below) Improve accessibility to local resource centers established within family developments, i.e., Green-Baxter Court and Maple Meadows.

Other PHA Goals and Objectives: (list below)

Not applicable

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

i. 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

ii. 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.

iii. Annual Plan Table of Contents

[24 CFR Part 903.7 9 (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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Annual Plan

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ii. Table of Contents

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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 **Appendix A**
- FY 2000 Capital Fund Program Annual Statement **Appendix B**
- 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 **Appendix C**
- FY 2000 Capital Fund Program 5 Year Action Plan **Appendix D**
- Definition of “Standard Deviation” **Appendix E**
- Public Housing Drug Elimination Program (PHDEP) Plan **Appendix F**
- Comments of Resident Advisory Board or Boards (must be attached if not included in PHA Plan text) **Appendix G**
- Other (List below, providing each attachment name)

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 |
| ✓ | PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations | 5 Year and Annual Plans |
| ✓ | State/Local Government Certification of Consistency with the Consolidated Plan | 5 Year and Annual Plans |
| | 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 PHA’s involvement. | 5 Year and Annual Plans |
| ✓ Years 1995-00 | 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 |
| ✓ FY2000 | Most recent board-approved operating budget for the public housing program | Annual Plan: Financial Resources; |
| ✓ | 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 |
| ✓ | Section 8 Administrative Plan | Annual Plan: Eligibility, Selection, and Admissions Policies |
| | Public Housing Deconcentration and Income Mixing Documentation: 1. 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 2. Documentation of the required deconcentration and income mixing analysis | Annual Plan: Eligibility, Selection, and Admissions Policies |
| ✓ | Public housing rent determination policies, including the methodology for setting public housing flat rents ✓ check here if included in the public housing A & O Policy | Annual Plan: Rent Determination |

List of Supporting Documents Available for Review

| Applicable & On Display | Supporting Document | Applicable Plan Component |
|------------------------------------|---|---|
| ✓ | 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 |
| ✓ | Section 8 rent determination (payment standard) policies ✓ check here if included in Section 8 Administrative Plan | Annual Plan: Rent Determination |
| ✓ | 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 |
| ✓ | Public housing grievance procedures ✓ check here if included in the public housing A & O Policy | Annual Plan: Grievance Procedures |
| ✓ | Section 8 informal review and hearing procedures ✓ check here if included in Section 8 Administrative Plan | Annual Plan: Grievance Procedures |
| ✓ | The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant year | Annual Plan: Capital Needs |
| N/A | Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant | Annual Plan: Capital Needs |
| ✓ CGP 707-99 | 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 |
| N/A | 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 |
| N/A | Approved or submitted applications for demolition and/or disposition of public housing | Annual Plan: Demolition and Disposition |
| N/A | Approved or submitted applications for designation of public housing (Designated Housing Plans) | Annual Plan: Designation of Public Housing |
| N/A | 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 |
| N/A | Approved or submitted public housing homeownership programs/plans | Annual Plan: Homeownership |
| N/A | Policies governing any Section 8 Homeownership program <input type="checkbox"/> 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 |
| ✓ | 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 |

| List of Supporting Documents Available for Review | | |
|--|--|--|
| Applicable & On Display | Supporting Document | Applicable Plan Component |
| ✓ | 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 |
| ✓ | 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 |
| N/A | Troubled PHAs: MOA/Recovery Plan | Troubled PHAs |
| N/A | Other supporting documents (optional) (list individually; use as many lines as necessary) | (specify as needed) |
| | | |

1. Statement of Housing Needs

[24 CFR Part 903.79 (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 | Afford-ability | Supply | Quality | Access-ibility | Size | Loca-tion |
| Income <= 30% of AMI | 4.5 | 5 | 5 | 5 | N/A | 3 | N/A |
| Income >30% but <=50% of AMI | 4.5 | 5 | 5 | 5 | N/A | 3 | N/A |
| Income >50% but <80% of AMI | 3 | 3 | 3 | 3 | N/A | 3 | N/A |
| Elderly | 2 | 3 | 1 | 1 | N/A | 1 | N/A |
| Families with Disabilities | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| Race/Ethnicity | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| Race/Ethnicity | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| Race/Ethnicity | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| Race/Ethnicity | N/A | N/A | N/A | N/A | N/A | N/A | N/A |

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)

B. 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 | 508 | | 45 |
| Extremely low income <=30% AMI | 353 | 69% | |
| Very low income (>30% but <=50% AMI) | 145 | 29% | |
| Low income (>50% but <80% AMI) | 9 | 2% | |

| Housing Needs of Families on the Waiting List | | | |
|---|-----------------------|------|--|
| Families with children | 410 | 81% | |
| Elderly families | 13 | 2.5% | |
| Families with Disabilities | 77 | 15% | |
| White | 106 | 21% | |
| Black | 390 | 77% | |
| American Indian | 6 | 1% | |
| Asian | 6 | 1% | |
| Hispanic | 0 | 0% | |
| Characteristics by Bedroom Size (Public Housing Only) | | | |
| | NOT APPLICABLE | | |
| 1BR | | | |
| 2 BR | | | |
| 3 BR | | | |
| 4 BR | | | |
| 5 BR | | | |
| 5+ BR | | | |
| Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes | | | |
| If yes: | | | |
| How long has it been closed (# of months)? <u>24 Months</u> | | | |
| Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes | | | |
| Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <u>We are currently accepting applications from families who qualify for our Welfare-to-Work Voucher allocation.</u> | | | |

| Housing Needs of Families on the Waiting List | | | |
|--|---------------|---------------------|-----------------|
| Waiting list type: (select one) | | | |
| Section 8 tenant-based assistance | | | |
| <input checked="" 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 | 252 | | 65 |

| Housing Needs of Families on the Waiting List | | | |
|--|-----|------|--|
| Extremely low income <=30% AMI | 205 | 83% | |
| Very low income (>30% but <=50% AMI) | 39 | 15% | |
| Low income (>50% but <80% AMI) | 6 | 2% | |
| Families with children | 93 | 37% | |
| Elderly families | 1 | <1% | |
| Families with Disabilities | 126 | 50% | |
| White | 110 | 44% | |
| Black | 137 | 54% | |
| American Indian | 4 | 1.5% | |
| Asian | 1 | <1% | |
| Hispanic | 0 | 0% | |
| Characteristics by Bedroom Size (Public Housing Only) | | | |
| 1BR | 159 | | |
| 2 BR | 56 | | |
| 3 BR | 18 | | |
| 4 BR | 14 | | |
| 5 BR | 5 | | |
| 5+ BR | 0 | | |
| Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes | | | |
| If yes: | | | |
| How long has it been closed (# of months)? <u>1 Month</u> | | | |
| Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes | | | |
| Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes | | | |

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.

(1) 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. We will consider this, but probably not within the next twelve months because are efforts are focused on utilizing the 350 new unit authorized effectively.
- 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)

Need: Specific Family Types: The Elderly

Strategy 1: Target available assistance to the elderly:

Select all that apply

This is not a strategy of ours for the coming year because this is not a high need area either as identified by our waiting list or the Consolidated Plan.

- 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

Our waitlist analysis reveals this to be a high need family type; however, our existing served population reflects placement at a rate equal to or greater than the defined waitlist need. The following areas represent actions taken or in place currently:

- 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: We have built two modified 3BR units of 17 under a recent

new development program. We have completed one-bedroom breakthroughs to create 2 two-bedroom modified units, and with CGP funding, we continue to modify family site resource centers to meet accessibility guidelines.

- X Apply for special-purpose vouchers targeted to families with disabilities, should they become available: We were awarded 100 vouchers targeted to families with disabilities and that allocation is fully leased up. We will not apply this year, as our focus is on another special voucher allocation of 250 under the Welfare to Work program.
- X Affirmatively market to local non-profit agencies that assist families with disabilities: We work closely with CMH, CIL, ACA, HARC
- X Other: (list below) : Obtain grant funding to provide “supportive services” to non-elderly disabled.

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

Again, our waitlist analysis for both Section 8 and Public Housing reveals that Black families have a disproportionate need. However, our clientele served more than adequately reflects housing of this high need population. Therefore, we do not feel additional marketing in this area is warranted.

- 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 - This is not a high need area either, however, we are attempting to market Section 8 to expand all housing opportunities for Section 8 Voucher holders.
- 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:

- ✓ Funding constraints

- ✓ 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 (local Housing Affordability Task Force)
- Other: (list below)

2. Statement of Financial Resources

[24 CFR Part 903.7 9 (b)]

| Financial Resources: Planned Sources and Uses | | |
|---|---------------------|--|
| Sources | Planned \$ | Planned Uses |
| 1. Federal Grants (FY 2000 grants) | | |
| a) Public Housing Operating Fund | \$487,017 @.985 PFS | |
| b) Public Housing Capital Fund | \$584,769 | |
| c) HOPE VI Revitalization | \$0 | |
| d) HOPE VI Demolition | \$0 | |
| e) Annual Contributions for Section 8 Tenant-Based Assistance | \$6,204,642* | |
| f) Public Housing Drug Elimination Program (including any Technical Assistance funds) | \$79,399 | |
| g) Resident Opportunity and Self- Sufficiency Grants | \$0 | |
| h) Community Development Block Grant | \$15,000 | Public Housing Support services – non-elderly |
| i) HOME | N/A | |
| Other Federal Grants (list below) | | |
| Supportive Services Grant (shared with Plymouth H.C.) | \$20,000 | Supportive Services for elderly/disabled |
| 2. Prior Year Federal Grants (unobligated funds only) (list below) | | |
| PHDEP-99 (awarded 12/99) | \$79,399 | PH- safety/security |

| Financial Resources: Planned Sources and Uses | | |
|--|-------------------|---------------------|
| Sources | Planned \$ | Planned Uses |
| | | |
| | | |
| 3. Public Housing Dwelling Rental Income | \$699,433 | PH operations |
| | | |
| | | |
| 4. Other income (list below) | | |
| Interest Income | \$24,640 | Operations |
| Other Charges | \$17,000 | PH - operations |
| 4. Non-federal sources (list below) | | |
| | | |
| | | |
| | | |
| Total resources | \$8,211,299 | |
| | | |
| | | |

* Estimated; assumes renewal of expiring allocations.

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: We assess the number of units available or expected to be available within thirty to sixty days and call in three times as many applicants by bedroom designation.

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?

Note: Our admission exceed the federal requirement of 60/40, not because of targeting, but because wait list composition contains greater than 80% of the families who are at or below 30% of the AMI and because less than 30% of AMI is considered a high need category in the City's Consolidated Plan.

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:

c. Preferences

1 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**)

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: NONE OF THESE

- 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 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
- 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.

2 Date and Time

Former Federal preferences: (NONE OF THESE)

- 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)

- 1 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
 - Other preference(s) (list below)

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:

MI064-001, 008 – family developments

Employing new admission preferences at targeted developments
If selected, list targeted developments below:
MI064-001, 008 – family developments

Other (list policies and developments targeted below)

d. Yes 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:
MI064-001, 008 (scattered site, family developments)

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

(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) Upon written request by the landlord, we share prior landlord history if previously leased under the program.

(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:

Extenuating circumstances might include hospitalization of applicant or applicant's immediate family, poor credit history or as a reasonable accommodation. However, the applicant must have demonstrated a diligent housing search during the initial 60 days or a reason why the search could not be conducted for reasonable accommodation purposes.

(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

1. 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 – NONE OF THESE

- 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 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) Elderly over non-elderly singles

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.

3 Date and Time

Former Federal preferences NONE OF THESE

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)

- 1 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
2 Other preference(s) (list below)
Elderly/disabled over non-elderly/disabled singles

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) NOT APPLICABLE

- 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)

b. 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 903.7 9 (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---

- X 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:

The policy language mimics that published in the federal register for minimum rent hardship cases. It involves loss or reduction in benefits, loss of family members to death and subsequent expenses or medical problems resulting in increased expenses.

c. Rents set at less than 30% than adjusted income

1. Yes 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:

This could occur where flat rents or minimum rents are charged.

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 - Previous to setting flat rents this Commission used ceiling rents.

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

NONE

- 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)

NOT APPLICABLE

- 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 (as it relates to new income such as a new job, promotion or new benefit award.)
- Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold)_____
- Other (list below)

- 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)
Review of operating costs and capital reserve requirements.

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 (use 105% of FMR for 1,2,3 bedrooms)
- 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) NOT APPLICABLE

- 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) NOT APPLICABLE

- 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)

Same as identified for public housing as published in the Federal Register.

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

Describe the PHA's management structure and organization.

(select one)

- An organization chart showing the PHA's management structure and organization is attached. (APPENDIX C)
- 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 | 356 | 70-75 units |
| Section 8 Vouchers | 890 | 36 |
| Section 8 Certificates | 142 | 12 |
| Section 8 Mod Rehab | N/A | N/A |
| Special Purpose Section 8 Certificates/Vouchers (list individually) | Disabled – 100 W-W Vouchers – 250 (included in Section 8 #'s) | 3 9 |
| Public Housing Drug Elimination Program (PHDEP) | 117 (included in ph #'s) | 25 |
| | | |
| Other Federal Programs(list individually) | | |
| | | |
| | | |

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)

Administration:

- Admissions & Continued Occupancy Policy
- Ethics Policy
- Drug Free Work Place Policy
- Lease
- Grievance Procedure/policy
- Criminal Records Management
- Equal Housing Opportunities Policy
- Pet Policy
- Community Facility Use Policy
- Parking Policy
- Deconcentration Policy

Financial:

Check signing Policy
Capitalization Policy
Disposition Policy
Funds Transfer Policy
Investment Policy
Procurement Policy
Rent Collection Policy
Travel Policy

Maintenance (work place) Operations:

Blood Borne Disease Policy
Fraud and Theft Policy
Hazardous Materials Policy
Maintenance Policy
Pest Control Policy
Vehicle Use Policy

(2) Section 8 Management: (list below)

Section 8 Administrative Plan

6. PHA Grievance Procedures

[24 CFR Part 903.7 9 (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?

If yes, list additions to federal requirements below:

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 903.7 9 (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) **APPENDIX B -**

-or-

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

(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.

a. 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) **APPENDIX D**

-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: Demolition <input type="checkbox"/> | |
| Disposition <input type="checkbox"/> | |
| 3. Application status (select one) | |
| Approved <input type="checkbox"/> | |
| Submitted, pending approval <input type="checkbox"/> | |
| Planned application <input type="checkbox"/> | |
| 4. Date application approved, submitted, or planned for submission: (DD/MM/YY) | |
| 5. Number of units affected: | |
| 6. 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; PHA’s 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.

| Designation of Public Housing Activity Description | |
|--|--|
| 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? |
| 6. 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 903.7 9 (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? | |
| <input type="checkbox"/> Assessment underway <input type="checkbox"/> Assessment results submitted to HUD <input type="checkbox"/> Assessment results approved by HUD (if marked, proceed to next question) <input type="checkbox"/> Other (explain below) | |
| 3. <input type="checkbox"/> Yes <input type="checkbox"/> 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) | |
| <input type="checkbox"/> Conversion Plan in development <input type="checkbox"/> Conversion Plan submitted to HUD on: (DD/MM/YYYY) <input type="checkbox"/> Conversion Plan approved by HUD on: (DD/MM/YYYY) <input type="checkbox"/> 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 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: | |
| <input type="checkbox"/> HOPE I <input type="checkbox"/> 5(h) <input type="checkbox"/> Turnkey III <input type="checkbox"/> Section 32 of the USHA of 1937 (effective 10/1/99) | |
| 3. Application status: (select one) | |
| <input type="checkbox"/> Approved; included in the PHA’s Homeownership Plan/Program <input type="checkbox"/> 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:

The program is in concept stage.

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 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? May 21, 1999

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)

b. Economic and Social self-sufficiency programs

- Yes No: Does the PHA coordinate, promote or provide any programs to enhance the economic and social self-sufficiency of residents? (If “yes”, complete the following table; if “no” skip to sub-component 2, Family self-sufficiency Programs. The position of the table may be altered to facilitate its use.)

| |
|------------------------------|
| Services and Programs |
|------------------------------|

| Program Name & Description (including location, if appropriate) | Estimated Size | Allocation Method (waiting list/random selection/specific criteria/other) | Access (development office / PHA main office / other provider name) | Eligibility (public housing or section 8 participants or both) |
|---|----------------|---|---|--|
| <i>Tenant Opportunities Program – NM</i> | 20 | N/A | <i>Community Impact</i> | <i>PH - families</i> |
| <i>Tenant Opportunities Program - MM</i> | 104 | N/A | <i>MM Resident Council</i> | <i>PH – elderly/disabled</i> |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

(2) Family Self Sufficiency program/s

a. Participation Description

| Family Self Sufficiency (FSS) Participation | | |
|--|---|---|
| Program | Required Number of Participants (start of FY 2000 Estimate) | Actual Number of Participants (As of: 12/31/99) |
| Public Housing | -0- | N/A |
| Section 8 | 68 | 0 |

- b. Yes No: If the PHA is not maintaining the minimum program size required by 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:
Will remarket program and attempt to connect interested S8 participants with partners being utilized under Welfare to Work initiative.

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)
Calls for service, documented narcotics purchases by undercover officers and resident reports of gambling, littering and open intoxicants.

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)

Funded drug elimination programs have targeted four major family developments: Maple Meadows, North Maple Estates, Hikone and Green/Baxter Court.

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)

Continuation of police in residence in two elder/disabled mid-rise buildings

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

Scattered site family developments (MI28-P064-001)

Elderly/disabled high-rise buildings (MI28-P064-005 and 007)

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)

Scattered site family developments (MI28-001)

Two elder/disabled mid-rise buildings (MI28-005, 007)

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: phdegtemp)

14. RESERVED FOR PET POLICY

[24 CFR Part 903.7 9 (n)]

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?
NOT APPLICABLE
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. X 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 (Appendix G)

Provided below:

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

X Considered comments, but determined that no changes to the PHA Plan were necessary. (with exception of checking one additional box under safety needs assessment.)

The PHA changed portions of the PHA Plan in response to comments
List changes below:

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.)

3. Description of Resident Election Process

Residents were informed of the creation of a Resident Advisory Board and encouraged to attend meetings for that purpose. Residents were recommended by Ann Arbor Housing Commission staff and were directly solicited as well.

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) There was no election process, all interested residents were encouraged to participate on the Board.

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) **NOT APPLICABLE**

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) **NOT APPLICABLE**

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: (provide name here)

City of Ann Arbor

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)

The City of Ann Arbor has documented the need for youth programming and supportive services for the disabled, and has and will continue to fund through CDBG funding non-profits who assist the Housing Commission under its Drug Elimination Programs as well as enable the Commission to procure additional contractual support to assist the non-elderly disabled.

The City of Ann Arbor has also recognized the lack of affordable housing in the area, and has created an Affordable Housing Task Force, which has met for the last six months to put forth a four goal, twenty-one specific objectives strategy to action over a three year period. One of the objectives, under the goal of increasing *first home ownership opportunity* is to “Expand use of Section 8 Vouchers for homeownership”, increasing the “capacity of Ann Arbor Housing Commission to manage a Section 8 mortgage program ...”. Another identified objective under the goal to *establish 3 new income sources for affordable housing* is to “utilize revenue bonds for housing, which is consistent with and supportive of the Commission’s goal of increasing its revenue stream by exploring issuance of revenue bonds.

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.

Appendix A – Admission’s Policy for Deconcentration

Appendix B – Fiscal Year 2000 Capital Fund Program Annual Statement

Appendix C – PHA Management Organizational Chart

Appendix D – Fiscal Year 2000 Capital Fund Program 5 – year Action Plan

Appendix E – Definition of “Standard Deviation” and “Significant Amendment and Modification”

Appendix F – Public Housing Drug Elimination Program Plan

Appendix G – Comments by Resident Advisory Board

APPENDIX A

ANN ARBOR HOUSING COMMISSION DECONCENTRATION POLICY

POLICY # ____

Original Issued Date: 6-16-99

Approved by Board: _____

Resolution # 99-30

1. Purpose:

To provide guidance in admissions and continued occupancy procedures about how to ensure deconcentration of poverty and encourage income mixing.

2. Policy:

The Ann Arbor Housing Commission seeks to deconcentrate pockets of poverty and promote income mixing in compliance with the QHWRA of 1998, by bringing higher income families into lower income developments and lower income families into higher income developments.

3. Procedures:

3.1 Prior to the beginning of each fiscal year, occupancy staff will analyze the income levels of families residing in each of our sites with 20 or more dwelling units, the income levels of the census tracts in which those sites 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. Please refer to attach worksheet for the analysis that will take place.

3.2 To achieve the goal of income mixing and deconcentration, we will skip families on the waiting list to reach other families with a lower or higher income. The skipping of families to achieve income targeting is a non-adverse, permissible action to achieve the congressional intent of the QHWRA of 1998. Waitlist management will be conducted in a uniform and non-discriminatory manner.

3.3 The Housing Commission will affirmatively market our housing to all eligible income groups (up to 80% of area median income). Lower income residents will not be steered toward lower income developments and higher income people will not be steered toward higher income developments.

3.4 The Housing Commission 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.

3.5 As a vacant unit becomes available, the Commission will contact the first family on the waiting list who has the highest priority for this type of unit and development and whose income category would help to meet the deconcentration goal and/or income targeting goal.

3.6 If in making the offer to a given family the Housing Commission skipped over other families on the waiting list in order to meet its deconcentration goal, or offered the family any 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 Commission did not skip over other families on the waiting list to reach this family and did not offer any deconcentration incentive, and the family rejects the unit without good cause, the family will drop to the bottom of the waiting list, while keeping any preferences.

Rejection of any unit offered with good cause will not result in loss of 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 hearing of the decision to alter their application status.

APPENDIX B

Capital Fund Program Annual Statement Parts I, II, and II

Annual Statement

Capital Fund Program (CFP) Part I: Summary

Capital Fund Grant Number 708 FFY of Grant Approval: (10/2000)

Original Annual Statement

| Line No. | Summary by Development Account | Total Estimated Cost |
|----------|---|----------------------|
| 1 | Total Non-CGP Funds | |
| 2 | 1406 Operations | |
| 3 | 1408 Management Improvements | \$56,000 |
| 4 | 1410 Administration | \$38,000 |
| 5 | 1411 Audit | |
| 6 | 1415 Liquidated Damages | |
| 7 | 1430 Fees and Costs | \$49,000 |
| 8 | 1440 Site Acquisition | |
| 9 | 1450 Site Improvement | \$37,700 |
| 10 | 1460 Dwelling Structures | \$318,471 |
| 11 | 1465.1 Dwelling Equipment-Nonexpendable | |
| 12 | 1470 Nondwelling Structures | \$5,200 |
| 13 | 1475 Nondwelling Equipment | \$33,619 |
| 14 | 1485 Demolition | |
| 15 | 1490 Replacement Reserve | |
| 16 | 1492 Moving to Work Demonstration | |
| 17 | 1495.1 Relocation Costs | |
| 18 | 1498 Mod Used for Development | |
| 19 | 1502 Contingency | |
| 20 | Amount of Annual Grant (Sum of lines 2-19) | \$537,990 |
| 21 | Amount of line 20 Related to LBP Activities | |
| 22 | Amount of line 20 Related to Section 504 Compliance | |
| 23 | Amount of line 20 Related to Security | \$10,000 |
| 24 | Amount of line 20 Related to Energy Conservation Measures | |

Annual Statement

Capital Fund Program (CFP) Part II: Supporting Table

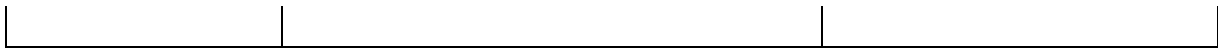
| Development Number/Name HA-Wide Activities | General Description of Major Work Categories | Development Account Number | Total Estimated Cost |
|---|--|----------------------------|----------------------|
| HA-Wide | Economic Development | 1408 | \$10,000 |
| HA-Wide | Resident Training | 1408 | \$3,000 |
| HA-Wide | Security/Crime Elimination | 1408 | \$10,000 |
| HA-Wide | Resident Initiative Coordinator | 1408 | \$20,000 |
| HA-Wide | Staff Training | 1408 | \$8,000 |
| HA-Wide | Computer Software Upgrade | 1408 | \$5,000 |
| HA-Wide | Administrative Salaries | 1410 | \$38,000 |
| HA-Wide | A & E Fees | 1430 | \$32,000 |
| HA-Wide | Advertisements | 1430 | \$2,000 |
| HA-Wide | Clerk of the Works | 1430 | \$15,000 |
| 001-Maple Meadows | Site Lighting-Upgrade contactors/photocells | 1450 | \$5,000 |
| 001-Maple Meadows | Site Improvements-Bicycle lock-ups | 1450 | \$6,000 |
| 001-Hikone | Site Lighting-Upgrade contactors/photocells | 1450 | \$5,000 |
| 001-North Maple | Site Lighting-Upgrade contactors/photocells | 1450 | \$5,000 |
| 001-North Maple | Site Lighting-NM Sign | 1450 | \$5,000 |
| 003-Platt(Col) | Landscaping | 1450 | \$4,000 |
| 005-Miller Manor | Site Improvements-Sidewalk/Greenhouse deck | 1450 | \$7,000 |
| 005-Miller Manor | Dumpster-Replace | 1450 | \$700 |
| 001-Maple Meadows | HVAC-New Furnaces | 1460 | \$28,021 |
| 001-Hikone | HVAC-New Furnaces | 1460 | \$24,000 |
| 001-Hikone | Electrical-Basement wall plugs (3/unit) | 1460 | \$9,000 |
| 001-Hikone | Roofing-Replace roofing & gutters | 1460 | \$35,000 |
| 001-North Maple | Porches-Repair & upgrade wood | 1460 | \$76,000 |
| 001-North Maple | Doors-Replace living room closet doors | 1460 | \$12,000 |
| 001-Oakwood | Walls/Ceilings-Install ceiling fans (2/unit) | 1460 | \$1,200 |
| 003-Platt(Col) | Electrical-Basement wall plugs (3/unit) | 1460 | \$2,250 |

| | | | |
|------------------|--|------|-----------|
| 003-Platt(Col) | Electrical-Install basement stairwell lights | 1460 | \$1,000 |
| 003-W/S/H | Aluminum fascia & overhangs | 1460 | \$25,000 |
| 005-Miller Manor | HVAC-Install air conditioning | 1460 | \$104,000 |
| 005-Miller Manor | Seal/stain entryway canopy | 1460 | \$1,000 |
| 001-Green | HVAC-A/C Community Center | 1470 | \$3,200 |
| 001-Hikone | Community Center-Drinking fountain | 1470 | \$2,000 |
| HA-Wide | Maintenance Tools/Vehicles | 1475 | \$22,000 |
| HA-Wide | Office Equipment | 1475 | \$4,119 |
| HA-Wide | Computer Hardware Upgrade | 1475 | \$7,500 |

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) |
|---|--|---|
| HA-Wide 1408 | Mar-02 | Sept-03 |
| HA-Wide 1410 | Mar-02 | Sept-03 |
| HA-Wide 1430 | Mar-02 | Sept-03 |
| HA-Wide 1475 | Mar-02 | Sept-03 |
| MI28P064-001 Green Road | Mar-02 | Sept-03 |
| Maple Meadows | Mar-02 | Sept-03 |
| Hikone | Mar-02 | Sept-03 |
| North Maple | Mar-02 | Sept-03 |
| Oakwood | Mar-02 | Sept-03 |
| MI28P064-003 Platt(Col) | Mar-02 | Sept-03 |
| White/State/Henry | Mar-02 | Sept-03 |
| MI28P064-005 Miller Manor | Mar-02 | Sept-03 |
| MI28P064-007 Baker Commons | Mar-02 | Sept-03 |



**APPENDIX C
ORGANIZATIONAL CHART**

Board of Commissioner's
Kate Warner, President
Sam Perry, Vice-President
Hazel Turner
Michael Martin
Larry French

Executive Director
Elizabeth Lindsley

Fiscal/Admin Mgr
Ademola Osofisan

Acct. Clerk II
Claudia Neeb

Acct. Clerk I
Gayland Thompson

Clerk Typist I
Gayle White

Maintenance Suprvr
Matthew Waldsmith

Clerk III
Rochelle Baker

HQS Inspector
Paul Winters (.5 FTE)

Maintenance WKRS II
Joe Buford
Gib Blevins
Jim Hughes
Dale Johnson
Paul Winters (.5 FTE)

Maintenance WKR I
Frank Sartor

Hsg. Prgrms. Mgr.
Cynthia C. Telfer

Section 8 Coordinators:
Ann Anglin
Leslee Clerkley
Sue Niedzielski

Public Housing Specialist:
Kathleen Schlipp

Clerk III (section 8)
Dena Cage

Intake/Waitlist Specialist
Sharri Norris

Resident Initiatives Coord.
Tom McHugh

Supportive Servc. Coords.
Marne
Katie

APPENDIX D

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

| Optional 5-Year Action Plan Tables | | | |
|--|--|---------------------|--|
| Development Number | Development Name (or indicate PHA wide) | Number Vacant Units | % Vacancies in Development |
| MI28P064-001 | Green Road | 0 | 0% |
| Description of Needed Physical Improvements or Management Improvements | | Estimated Cost | Planned Start Date (HA Fiscal Year) |
| Parking lot -Seal & Restrip | | \$3,000 | FY2002 |
| Site Improvements - Landscape/concrete | | \$1,000 | FY2003 |
| Drainage-Improve concrete around buildings | | \$40,000 | FY2004 |
| Dumpster – Replace | | \$700 | FY2005 |
| Playground – Upgrade equipment | | \$3,000 | FY2005 |
| Plumbing - Install new ball valves at water meter | | \$3,600 | FY2002 |
| Plumbing - Repair 1725 building shutoff | | \$4,000 | FY2002 |
| Doors - Upgrade exterior locks | | \$9,600 | FY2003 |
| Siding - Paint trim | | \$16,000 | FY2005 |
| Plumbing - Replace hot water tanks | | \$4,800 | FY2005 |
| HVAC - New furnaces | | \$48,000 | FY2005 |
| Seal/stain wood privacy fences | | \$4,800 | FY2005 |
| HVAC - Install central air conditioning | | \$76,800 | FY2006 |
| Roofing - Replace gutters & downspouts | | \$10,000 | FY2006 |
| Siding - Install vinyl siding | | \$120,000 | FY2006 |
| Insulate over stairwells | | \$7,000 | FY2006 |
| Appliance replacement | | \$16,800 | FY2002 |
| Community Center-Expand/504/add 1/2 bath | | \$50,000 | FY2004 |
| Total estimated cost over next 5 years | | \$419,100.00 | |

Optional 5-Year Action Plan Tables

| Development Number | Development Name (or indicate PHA wide) | Number Vacant Units | % Vacancies in Development | | |
|---|--|----------------------------|-----------------------------------|-----------------------|--|
| MI28P064-001 | Maple Meadows | 5 | 16% | | |
| Description of Needed Physical Improvements or Management Improvements | | | | Estimated Cost | Planned Start Date (HA Fiscal Year) |
| Parking lot -Seal & Restrip | | | | \$6,000 | FY2002 |
| Drainage-Improve concrete around buildings | | | | \$40,000 | FY2004 |
| Landscaping - Replace flower boxes | | | | \$16,900 | FY2005 |
| Site Improvements - Landscape/concrete | | | | \$1,000 | FY2005 |
| Dumpster - Replace | | | | \$700 | FY2005 |
| Playground - Upgrade equipment | | | | \$2,000 | FY2005 |
| HVAC - New furnaces | | | | \$31,979 | FY2002 |
| Doors - Upgrade exterior locks | | | | \$12,000 | FY2002 |
| Electrical - Basement wall plugs (3/unit) | | | | \$9,000 | FY2003 |
| Walls/Ceilings - Install ceiling fans (2/unit) | | | | \$12,000 | FY2003 |
| Doors - Weather strip and caulk around doors/windows to improv efficiency | | | | \$13,500 | FY2003 |
| Plumbing - Install shut off valves(kit/bath) | | | | \$3,900 | FY2003 |
| Siding - Install vinyl siding | | | | \$150,000 | FY2003 |
| Plumbing - Install garbage disposals | | | | \$18,000 | FY2004 |
| Siding - Paint trim | | | | \$20,000 | FY2005 |
| Plumbing - Replace hot water tanks | | | | \$6,000 | FY2005 |
| Seal/stain wood privacy fences | | | | \$6,000 | FY2005 |
| Insulate over stairwells | | | | \$9,000 | FY2006 |
| Bathroom - Floor drains in some apts are not connected, repair | | | | \$6,000 | FY2006 |
| Appliance replacement | | | | \$21,000 | FY2002 |
| Community Center-Expand/504/add 1/2 bath | | | | \$50,000 | FY2004 |
| Total estimated cost over next 5 years | | | | \$434,979.00 | |

| Optional 5-Year Action Plan Tables | | | | |
|--|---|---------------------|----------------------------|-------------------------------------|
| Development Number | Development Name (or indicate PHA wide) | Number Vacant Units | % Vacancies in Development | |
| MI28P064-001 | Hikone | 3 | 10% | |
| Description of Needed Physical Improvements or Management Improvements | | | Estimated Cost | Planned Start Date (HA Fiscal Year) |
| Parking lot -Seal & Restrip | | | \$7,200 | FY2002 |
| Drainage-Improve concrete around buildings | | | \$40,000 | FY2002 |
| Site Improvement/LBP removal parking bollard | | | \$10,000 | FY2003 |
| Site Improvements - Landscape/concrete | | | \$1,000 | FY2005 |
| Dumpster - Replace | | | \$700 | FY2005 |
| Playground - Upgrade equipment | | | \$2,000 | FY2005 |
| HVAC - New furnaces | | | \$26,000 | FY2002 |
| Plumbing - Install new ball valves at water meter | | | \$4,500 | FY2002 |
| Siding - Paint trim | | | \$20,000 | FY2005 |
| Seal/stain wood privacy fences | | | \$6,000 | FY2005 |
| Plumbing - Replace hot water tanks | | | \$6,000 | FY2005 |
| Plumbing - Install garbage disposals | | | \$18,000 | FY2005 |
| Siding - Install vinyl siding | | | \$150,000 | FY2006 |
| Insulate over stairwells | | | \$9,000 | FY2006 |
| Replace entrance door w/steel w/panic bar | | | \$2,000 | FY2005 |
| Total estimated cost over next 5 years | | | \$302,400.00 | |

| Optional 5-Year Action Plan Tables | | | |
|------------------------------------|---|---------------------|----------------------------|
| Development Number | Development Name (or indicate PHA wide) | Number Vacant Units | % Vacancies in Development |
| MI28P064-001 | North Maple | 2 | 10% |

| Description of Needed Physical Improvements or Management Improvements | Estimated Cost | Planned Start Date (HA Fiscal Year) |
|--|---------------------|-------------------------------------|
| Parking lot -Seal & Restrip | \$6,000 | FY2002 |
| Site Improvements - Landscape/concrete | \$1,000 | FY2002 |
| Dumpster - Replace | \$700 | FY2005 |
| Playground - Upgrade equipment | \$3,000 | FY2005 |
| Plumbing - Install new ball valves at water meter | \$3,000 | FY2002 |
| Walls/Ceilings - Install ceiling fans (2/unit) | \$8,000 | FY2002 |
| Flooring - Replace flooring (1st floor) | \$50,000 | FY2003 |
| Doors - Upgrade exterior locks | \$8,000 | FY2004 |
| Siding - Paint trim | \$20,000 | FY2005 |
| Doors - Replace bedroom closet doors | \$20,000 | FY2006 |
| Insulate over stairwells | \$6,000 | FY2006 |
| Flooring - Replace flooring (2nd floor) | \$50,000 | FY2006 |
| Appliance replacement | \$14,000 | FY2002 |
| Total estimated cost over next 5 years | \$189,700.00 | |

| Optional 5-Year Action Plan Tables | | | |
|--|---|---------------------|-------------------------------------|
| Development Number | Development Name (or indicate PHA wide) | Number Vacant Units | % Vacancies in Development |
| MI28P064-001 | Oakwood | 0 | 0% |
| Description of Needed Physical Improvements or Management Improvements | | Estimated Cost | Planned Start Date (HA Fiscal Year) |

| | | |
|---|--------------------|--------|
| Parking lot -Seal & Restrip | \$1,500 | FY2002 |
| Drainage/Site Improvement - Tie in gutters | \$6,000 | FY2003 |
| Seal wood stairs/decks | \$3,000 | FY2003 |
| Flooring-Replace flooring (1st level) | \$7,500 | FY2005 |
| Siding - Paint trim | \$3,000 | FY2005 |
| Plumbing - Replace hot water tanks | \$600 | FY2006 |
| Flooring-Replace flooring (2nd level) | \$7,500 | FY2006 |
| Additional linen space-upstairs bathroom (above towel rack) | \$3,000 | FY2006 |
| Insulate over stairwells | \$975 | FY2006 |
| Appliance replacement | \$2,100 | FY2005 |
| Total estimated cost over next 5 years | \$35,175.00 | |

| Optional 5-Year Action Plan Tables | | | | |
|--|---|---------------------|----------------------------|-------------------------------------|
| Development Number | Development Name (or indicate PHA wide) | Number Vacant Units | % Vacancies in Development | |
| MI28P064 | Platt Road (Upper) | 0 | 0% | |
| Description of Needed Physical Improvements or Management Improvements | | | Estimated Cost | Planned Start Date (HA Fiscal Year) |

| | | |
|---|--------------------|--------|
| Parking lot -Seal & Restrip | \$1,500 | FY2002 |
| Plumbing - Install new ball valves at water meter | \$600 | FY2002 |
| Seal wood stairs/decks | \$4,000 | FY2003 |
| Flooring-Replace flooring (1st level) | \$10,000 | FY2005 |
| Plumbing - Replace hot water tanks | \$800 | FY2005 |
| Siding - Paint trim | \$4,000 | FY2005 |
| Porch-Expand to decks | \$30,000 | FY2006 |
| Insulate over stairwells | \$1,200 | FY2006 |
| Additional linen space-upstairs bathroom (above towel rack) | \$4,000 | FY2006 |
| Flooring-Replace flooring (2nd level) | \$10,000 | FY2006 |
| Appliance replacement | \$2,800 | FY2005 |
| Storage sheds | \$20,000 | FY2006 |
| Total estimated cost over next 5 years | \$88,900.00 | |

| Optional 5-Year Action Plan Tables | | | |
|--|---|---------------------|-------------------------------------|
| Development Number | Development Name (or indicate PHA wide) | Number Vacant Units | % Vacancies in Development |
| MI28P064-001 | 7 th /Washington | 0 | 0% |
| Description of Needed Physical Improvements or Management Improvements | | Estimated Cost | Planned Start Date (HA Fiscal Year) |

| | | |
|---|--------------------|--------|
| Parking lot -Seal & Restrip | \$3,600 | FY2002 |
| Site Improvements - Landscape/concrete | \$1,500 | FY2003 |
| Walls/Ceilings - Install ceiling fans (2/unit | \$1,000 | FY2002 |
| HVAC - W.W. New furnaces | \$8,000 | FY2002 |
| Interior - W.W. New carpet | \$3,600 | FY2002 |
| Install doorbells | \$2,500 | FY2003 |
| Insulate W.W. floor joists | \$400 | FY2003 |
| Bathrooms - New bathtub liners | \$9,000 | FY2004 |
| Seal/stain wood privacy fences | \$1,600 | FY2005 |
| Seal wood stairs/deck - W.W. | \$600 | FY2005 |
| Install extra shelving in pantry (between stove & bathroom) | \$1,000 | FY2006 |
| Plumbing - Replace hot water tanks | \$2,000 | FY2006 |
| Siding - Paint trim | \$5,000 | FY2006 |
| Appliance replacement | \$7,000 | FY2005 |
| Storage sheds | \$50,000 | FY2006 |
| Total estimated cost over next 5 years | \$96,800.00 | |

| Optional 5-Year Action Plan Tables | | | |
|--|---|---------------------|-------------------------------------|
| Development Number | Development Name (or indicate PHA wide) | Number Vacant Units | % Vacancies in Development |
| MI28P064-003 | Broadway | 3 | 15% |
| Description of Needed Physical Improvements or Management Improvements | | Estimated Cost | Planned Start Date (HA Fiscal Year) |

| | | |
|--|---------------------|---------------|
| Parking lot -Seal & Restrip | \$4,500 | FY2002 |
| Site Signage - Replace | \$4,000 | FY2003 |
| Dumpster - Replace | \$700 | FY2003 |
| Site Improvements - Landscape/concrete | \$1,000 | FY2005 |
| Walls/Ceilings - Install ceiling fans (1/unit) | \$8,000 | FY2002 |
| Kitchens - Stove backsplashes | \$3,000 | FY2002 |
| Plumbing - Install new ball valves at water meter | \$3,000 | FY2002 |
| Roof/Chimney - Repair chimney | \$3,000 | FY2002 |
| Foundation - Repair 1506 cracks | \$4,000 | FY2003 |
| Install awnings on lower unit windows on south side (18 windows) | \$7,200 | FY2003 |
| Flooring - Install new carpeting | \$14,000 | FY2005 |
| Plumbing - Upgrade bathrooms | \$6,000 | FY2005 |
| HVAC-Install central air conditioning | \$100,000 | FY2006 |
| Install roof antennas | \$9,000 | FY2006 |
| Appliance replacement | \$14,000 | FY2005 |
| Total estimated cost over next 5 years | \$181,400.00 | |

| Optional 5-Year Action Plan Tables | | | |
|---|--|----------------------------|--|
| Development Number | Development Name (or indicate PHA wide) | Number Vacant Units | % Vacancies in Development |
| MI28P064-003 | Platt Road (Colonial Sq) | 1 | 20% |
| Description of Needed Physical Improvements or Management Improvements | | Estimated Cost | Planned Start Date (HA Fiscal Year) |
| Parking lot -Seal & Restrip | | \$1,500 | FY2002 |
| Walls/Ceilings - Install ceiling fans (2/unit) | | \$2,000 | FY2002 |
| HVAC - New furnaces | | \$10,000 | FY2005 |
| Plumbing - Replace hot water tanks | | \$1,000 | FY2005 |
| Install wood privacy fences | | \$10,000 | FY2006 |
| Insulate over stairwells | | \$1,500 | FY2006 |
| Appliance replacement | | \$3,500 | FY2005 |
| Total estimated cost over next 5 years | | \$29,500.00 | |

Optional 5-Year Action Plan Tables

| Development Number | Development Name (or indicate PHA wide) | Number Vacant Units | % Vacancies in Development | | |
|---|--|----------------------------|-----------------------------------|-----------------------|--|
| MI28P064-003 | White/State/Henry | 1 | 3% | | |
| Description of Needed Physical Improvements or Management Improvements | | | | Estimated Cost | Planned Start Date (HA Fiscal Year) |
| Parking lot -Seal & Restrip | | | | \$4,500 | FY2002 |
| Dumpster - Replace | | | | \$700 | FY2005 |
| Landscaping - Plantings/shrubs | | | | \$5,000 | FY2006 |
| Walls/Ceilings - Install ceiling fans (2/unit) | | | | \$11,200 | FY2002 |
| Upgrade bathrooms - New toilets, sinks, vanity, fixtures | | | | \$40,600 | FY2002 |
| Kitchens - Stove backsplashes | | | | \$4,200 | FY2002 |
| Upgrade antenna | | | | \$3,000 | FY2002 |
| LBP Abatement in common areas | | | | \$30,000 | FY2002 |
| Roofing - Replace roofing & gutters | | | | \$24,000 | FY2003 |
| Insulate over stairwells | | | | \$5,600 | FY2005 |
| Sandblast exterior brick | | | | \$30,000 | FY2005 |
| Plumbing - Replace hot water tanks | | | | \$5,600 | FY2005 |
| Windows - Upgrade picture windows | | | | \$14,000 | FY2005 |
| Flooring - Replace common area flooring | | | | \$10,500 | FY2005 |
| Appliance replacement | | | | \$19,600 | FY2005 |
| Total estimated cost over next 5 years | | | | \$208,500.00 | |

Optional 5-Year Action Plan Tables

| Development Number | Development Name (or indicate PHA wide) | Number Vacant Units | % Vacancies in Development | |
|--|--|---------------------|----------------------------|--|
| MI28P064-005 | Miller Manor | 5 | 4% | |
| Description of Needed Physical Improvements or Management Improvements | | | Estimated Cost | Planned Start Date (HA Fiscal Year) |
| Parking lot -Seal & Restrip | | | \$6,000 | FY2002 |
| Paint units, hallways, trashrooms, basement | | | \$104,000 | FY2002 |
| Replace carpet in lobby | | | \$4,000 | FY2005 |
| Replace carpet in common hallways | | | \$42,000 | FY2005 |
| Bathrooms - Additional bathroom shelves | | | \$10,400 | FY2006 |
| Doors - Door guards on handicap units | | | \$5,000 | FY2006 |
| Appliance replacement | | | \$72,800 | FY2005 |
| Administrative Office - Night rent drop box | | | \$2,000 | FY2002 |
| Administrative Office - Carpet & paint | | | \$14,000 | FY2006 |
| Public Area - Upgrade restrooms | | | \$6,000 | FY2003 |
| Replace carpet in community room | | | \$3,000 | FY2002 |
| New doors lobby to community room | | | \$2,000 | FY2005 |
| New Trashroom doors | | | \$2,000 | FY2005 |
| Security - Install camera systems | | | \$15,000 | FY2002 |
| Lobby/Comm Rm - New furniture | | | \$5,000 | FY2006 |
| Total estimated cost over next 5 years | | | \$293,200.00 | |

Optional 5-Year Action Plan Tables

| Development Number | Development Name (or indicate PHA wide) | Number Vacant Units | % Vacancies in Development | |
|--|--|---------------------|----------------------------|--|
| MI28P064-007 | Baker Commons | 4 | 6% | |
| Description of Needed Physical Improvements or Management Improvements | | | Estimated Cost | Planned Start Date (HA Fiscal Year) |

| | | |
|---|---------------------|--------|
| Parking lot -Seal & Restrip | \$6,000 | FY2002 |
| Site Improvements - Landscape/concrete | \$1,000 | FY2005 |
| Paint units, hallways, trashrooms, basement | \$64,000 | FY2003 |
| New chiller unit | \$100,000 | FY2004 |
| New thermostats - temp adjustable | \$6,400 | FY2005 |
| Kitchens - Replace stove hood vent fans | \$4,800 | FY2005 |
| Appliance replacement | \$7,000 | FY2005 |
| Lobby/Community room- New carpet | \$4,000 | FY2002 |
| Community Room-Openable windows | \$4,000 | FY2006 |
| Security camera | \$15,000 | FY2002 |
| Basement exhaust fan | \$3,500 | FY2002 |
| TV components replacement | \$6,000 | FY2003 |
| Lobby/Comm space furniture | \$5,000 | FY2006 |
| Total estimated cost over next 5 years | \$226,700.00 | |

| Optional 5-Year Action Plan Tables | | | |
|---|--|----------------------------|--|
| Development Number | Development Name (or indicate PHA wide) | Number Vacant Units | % Vacancies in Development |
| MI28P064-008 | Evelyn Court | 0 | 0% |
| Description of Needed Physical Improvements or Management Improvements | | Estimated Cost | Planned Start Date (HA Fiscal Year) |
| Landscaping - Plantings/shrubs | | \$1,000 | FY2006 |
| Insulate crawl space | | \$1,000 | FY2006 |
| Repair/replace flooring throughout | | \$3,000 | FY2006 |
| Total estimated cost over next 5 years | | \$5,000.00 | |

| Optional 5-Year Action Plan Tables | | | | |
|--|--|---------------------|----------------------------|--|
| Development Number | Development Name (or indicate PHA wide) | Number Vacant Units | % Vacancies in Development | |
| MI28P064-008 | North Maple (Duplexes) | 0 | 0% | |
| Description of Needed Physical Improvements or Management Improvements | | | Estimated Cost | Planned Start Date (HA Fiscal Year) |
| Parking lot -Seal & Restrip | | | \$4,500 | FY2002 |
| Landscaping - Plantings/shrubs | | | \$1,000 | FY2005 |
| Seal wood stairs/decks | | | \$1,000 | FY2005 |
| Appliance replacement | | | \$2,800 | FY2006 |
| Total estimated cost over next 5 years | | | \$9,300.00 | |

| Optional 5-Year Action Plan Tables | | | | |
|--|--|---------------------|----------------------------|--|
| Development Number | Development Name (or indicate PHA wide) | Number Vacant Units | % Vacancies in Development | |
| MI28P064-008 | Mallets Creek | 0 | 0% | |
| Description of Needed Physical Improvements or Management Improvements | | | Estimated Cost | Planned Start Date (HA Fiscal Year) |

| | | |
|---|--------------------|--------|
| Parking lot -Seal & Restrip | \$4,500 | FY2002 |
| Landscaping - Plantings/shrubs | \$2,000 | FY2005 |
| Seal wood stairs/decks | \$1,500 | FY2005 |
| Appliance replacement | \$4,200 | FY2006 |
| Total estimated cost over next 5 years | \$12,200.00 | |

| Optional 5-Year Action Plan Tables | | | |
|--|---|---------------------|-------------------------------------|
| Development Number | Development Name (or indicate PHA wide) | Number Vacant Units | % Vacancies in Development |
| MI28P064-008 | Hillside | 0 | 0% |
| Description of Needed Physical Improvements or Management Improvements | | Estimated Cost | Planned Start Date (HA Fiscal Year) |
| Parking lot -Seal & Restrip | | \$4,500 | FY2002 |
| Landscaping - Plantings/shrubs | | \$2,000 | FY2005 |
| Seal wood stairs/decks | | \$3,000 | FY2005 |
| Appliance replacement | | \$4,200 | FY2006 |
| Total estimated cost over next 5 years | | \$13,700.00 | |

| Optional 5-Year Action Plan Tables | | | |
|--|---|---------------------|-------------------------------------|
| Development Number | Development Name (or indicate PHA wide) | Number Vacant Units | % Vacancies in Development |
| MI28P064 | PHA-Wide | | |
| Description of Needed Physical Improvements or Management Improvements | | Estimated Cost | Planned Start Date (HA Fiscal Year) |

| | | |
|---|---------------------|--------|
| 1408 Management Improvements | | |
| Economic Development | \$50,000 | FY2002 |
| Resident Training | \$15,000 | FY2002 |
| Security/Crime Elimination | \$50,000 | FY2002 |
| Resident Initiatives Coordinator | \$100,000 | FY2002 |
| Staff Training | \$40,000 | FY2002 |
| Computer Software Upgrade | \$15,000 | FY2002 |
| 1410 Administrative Salaries | | |
| Administrative Salaries | \$190,000 | FY2002 |
| 1430 A & E Fees | | |
| A & E Fees | \$160,000 | FY2002 |
| Advertisements | \$10,000 | FY2002 |
| Clerk of the Works | \$75,000 | FY2002 |
| 1475 Non Dwelling Equipment (PHA-Wide) | | |
| Maintenance Tools/Vehicle | \$68,000 | FY2002 |
| Office Equipment | \$24,113 | FY2002 |
| Computer Hardware Upgrade | \$37,587 | FY2002 |
| Total estimated cost over next 5 years | \$834,700.00 | |

APPENDIX E

Substantial Deviation

“Substantial Deviation” from the five-year plan in the Agency Plan or “significant amendment or modification” of the Annual Plan requires the Ann Arbor Housing Commission to submit a revised “PHA Plan” that has met full public process requirements.

“Substantial Deviation” means a change in policy that redirects the Ann Arbor Housing Commission’s course and/or revises the mission, goals and objectives of the Ann Arbor Housing Commission.

“Significant amendment or modification” means changes to the Ann Arbor Housing Commission policies that reflect a directional shift from the published mission and policies included in the Annual and Agency Plan.

Changes in the following areas may qualify as a “significant amendment or modification”:

- 1) Changes to rent, i.e. increasing or decreasing minimum rent
- 2) Changes to Admission’s policies and organization of the waiting list
- 3) Additions of non-emergency work items, (items not included in the current Annual Statement or 5-year Action Plan), or a change in use of replacement reserve funds under the Capital Fund.
- 4) Changes in activities not included in the current PHDEG Plan that would change the programs focus, i.e., shifting from Reimbursement of Law enforcement to Tenant Patrols.
- 5) Any change with regard to demolition or disposition, designation, homeownership programs or conversion activities.

Changes to Ann Arbor Housing Commission internal policies that regulate administrative functions, such as, Check Signing Policy, Travel Policy, Vehicle Use Policy, are not included in the definitions or examples listed above.

Changes to Occupancy Policies (Public Housing and Section 8) that clarify or expound on existing policies included in the Agency Plan are not considered for the purpose of this definition.

Changes to policies included in the Annual Plan and Agency Plan that are as a result of regulatory requirements are also not considered by the Ann Arbor Housing Commission and the Department of Housing and Urban Development to be significant amendments.

APPENDIX F

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 \$79,399

B. Eligibility type (Indicate with an "x") N1 _____ N2 _____ R

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

This plan is the continuation of a comprehensive drug elimination program involving community policing (over baseline services), prevention programs targeted to youth at risk and an intervention/treatment component primarily addressing adult needs.

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) |
|--|--|--|
| S. Maple, N. Maple, Hikone, Green MI064-001 | 107 | |
| Partial Project MI064-008 | 4 | |
| | | |

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 _____ 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, indicates 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 Submission | Grant Extensions or Waivers | Anticipated Completion Date |
|-------------------------------|-------------------------------|----------------|---|------------------------------------|------------------------------------|
| FY 1995 | N/A | | | | |
| FY 1996 | \$172,000 | MI28DEP0640196 | -0- | 09/30/98 | 09/30/98 |
| FY 1997 | \$103,200 | MI28DEP0640197 | -0- | 09/18/99 | 09/18/99 |
| FY1998 | \$108,600 | MI28DEP0640198 | \$75,000 * | N/A | 09/30/00 |
| FY 1999 | \$ 79,399 | MI28DEP0640199 | -0- | N/A | 06/30/01 |

* Estimate as of 3/31/00 based on actuals at 12/31/99

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.

AAHC's target area encompasses our four major scattered public housing family sites ranging from 20-30 units each, plus two closely proximate smaller scattered family complexes of 4-6 units. This strategy is multi-pronged, in terms of contracting with the Ann Arbor Police Department for a community oriented policing team assigned solely to our target sites, to increase their presence above baseline service, contracting with four community-based non-profit service agencies (and potentially one resident council), each linked to a specific site and providing prevention and intervention services dictated by the needs and desires of the residents at those sites. Our overriding goal is to eliminate drug use and drug-related activities at our sites and by our residents with an ultimate outcome of building youth and adult capacity to resist drugs and to improve self-sufficiency opportunities, through positive, constructive activities, educational programs, and family/community supportive services. Program monitoring takes place through regular monthly meetings of collaborative plan partners, submission of monthly reports, and through the annual resident safety/security survey results.

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 | \$25,000 |
| 9120 - Security Personnel | N/A |
| 9130 - Employment of Investigators | N/A |
| 9140 - Voluntary Tenant Patrol | N/A |
| 9150 - Physical Improvements | N/A |
| 9160 - Drug Prevention | \$38,000 |
| 9170 - Drug Intervention | \$12,000 |
| 9180 - Drug Treatment | N/A |
| 9190 - Other Program Costs | \$4,399 |
| | N/A |
| TOTAL PHDEP FUNDING | \$79,399 |

C. 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.

| | |
|--|---------------------------------------|
| 9110 - Reimbursement of Law Enforcement | Total PHDEP Funding: \$ 25,000 |
|--|---------------------------------------|

| | | | | | | | |
|--|---|-------------------|------------|------------------------|----------------------------|-------------------------------|---|
| Goal(s) | Eliminate the use of drugs and drug-related criminal activity | | | | | | |
| Objectives | 1) Increase visibility of police within the targeted communities 2) Increase resident involvement in drug/crime prevention through improved resident/COP communication and trust | | | | | | |
| Proposed Activities | # of Persons Served | Target Population | Start Date | Expected Complete Date | PHEDEP Funding \$25,000 | Other Funding (Amount/Source) | Performance Indicators |
| 1. Foot, bike, car patrols | | | 07/01/01 | 12/31/01 | | \$38,000 City Match | Per resident survey #4: decrease in perception of site-based drug use and drug-related activities |
| 2. Surveillance | | | 07/01/01 | 12/31/01 | | | Per Police Reports: increase in police citation/conviction for site-based drug activity |
| 3. Site Based meetings with Residents or Councils and event activities | | | 07/01/01 | 12/31/01 | | | Per resident survey (1-3): increase in resident perception of safety at site. |

| | | | | | | | |
|---|---------------------|-------------------|------------|------------------------|--------------------------------|-------------------------------|------------------------|
| 9120 - Security Personnel NOT APPLICABLE | | | | | Total PHDEP Funding: \$ | | |
| 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 NOT APPLICABLE | | | | | Total PHDEP Funding: \$ | | |
|--|---------------------|-------------------|------------|------------------------|--------------------------------|--------------------------------|------------------------|
| 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. | | | | | | | |

| 9140 - Voluntary Tenant Patrol NOT APPLICABLE | | | | | Total PHDEP Funding: \$ | | |
|--|---------------------|-------------------|------------|------------------------|--------------------------------|--------------------------------|------------------------|
| 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. | | | | | | | |
| 3. | | | | | | | |

| 9150 - Physical Improvements NOT APPLICABLE | | | | | Total PHDEP Funding: \$ | | |
|--|---------------------|-------------------|------------|------------------------|--------------------------------|--------------------------------|------------------------|
| 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. | | | | | | | |
| 3. | | | | | | | |

9160 - Drug Prevention

Total PHDEP Funding: \$ 38,000

| | | | | | | | |
|---------------------------|--|-------------------|------------|------------------------|--------------------------------------|---|---|
| Goal(s) | Build youth and adult capacity to resist drugs and promote self-sufficiency through a variety of activities | | | | | | |
| Objectives | 1) Reach 75% of youth (ages 5 –17) through recreational/cultural, educational activities; and 25% of adults through family support and community building/organizing programs; 2) maintain 2 site-based resident councils, and seek to build one more. | | | | | | |
| | # of Persons Served | Target Population | Start Date | Expected Complete Date | PHEDEP Funding Total \$38K | Other Funding (Amount /Source) \$50K | Performance Indicators |
| 1.Recreational/Cultural | 50 | Youth | 02/01/01 | 12/31/01 | | CAN | Increase youth engagement |
| 2.Substance Abuse Educ. | 50 | Youth | 02/01/01 | 12/31/01 | | CAN/PNC | Lower youth drug experimentation/use |
| 3.Other Education | 200 | Youth | 02/01/01 | 12/31/01 | | Com'ty Volunteers | Increase reading MEAP scores/ 3 rd graders; increase computer skills |
| 4.Community Org/Building | 35 | Youth/Adult | 02/01/01 | 12/31/01 | | SAC/PNC | Increase pride in community; engagement |
| 5.Family Support Services | 80 | Adult | 02/01/01 | 12/31/01 | | PNC/CAN/SAC/OCI | Reduce barriers to meeting basic needs |

| 9170 - Drug Intervention | | | | | Total PHDEP Funding: \$ 12,000 | | |
|--------------------------------------|---|-------------------|------------|------------------------|---------------------------------------|--------------------------------|---|
| Goal(s) | Provide support or referral for treatment | | | | | | |
| Objectives | To identify and support individuals seeking treatment or maintaining recovery | | | | | | |
| Proposed Activities | # of Persons Served | Target Population | Start Date | Expected Complete Date | PHDEP Funding | Other Funding (Amount /Source) | Performance Indicators |
| | 20-25 | | | | \$12K | | |
| 1. Referrals for treatment | | Adults | 04/01/01 | 12/31/01 | | | Number of referrals versus follow through (50%) |
| 2. Direct Substance abuse counseling | | Adults | 04/01/01 | 12/01/01 | | | Number completing treatment and counseling |
| 3. | | | | | | | |

| 9180 - Drug Treatment | | | | | Total PHDEP Funding: \$ | | |
|------------------------------|---------------------|-------------------|------------|------------------------|--------------------------------|--------------------------------|------------------------|
| 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. | | | | | | | |
| 3. | | | | | | | |

| 9190 - Other Program Costs | | | | | Total PHDEP Funds: \$ \$4,399 | | |
|--|---|-------------------|--------------|------------------------|-------------------------------|-----------------------------------|--|
| Goal(s) | To promote program accountability and collaboration among providers | | | | | | |
| Objectives | Through regular communication and evaluation review. | | | | | | |
| Proposed Activities | # of Persons Served | Target Population | Start Date | Expected Complete Date | PHEDep Funding | Other Funding (Amount /Source) | Performance Indicators |
| 1. Monthly Provider Mtgs | | | 02/01/01 | 12/01/01 | \$1,000 (Admin Salaries) | Comp Grant – resident initiatives | Program adjustments resulting from outcome monitoring |
| 2. Annual Audit | | | 08/01, 10/01 | 10/01, 10/02 | -0- | Low Rent operating Funds | Unqualified opinion by CPA on eligibility, efficacy and timeliness of fund use. |
| 3. Annual Resident Survey/Program Evaluation | | | 11/01 | 1/02 | \$2,500 | -0- | Improvement in resident perception of safety and drug-related activities on sites. |
| 4. All site events | | | 8/01 | 12/01 | \$ 499 | Community Donations | Maintain or Increase Participation |

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 # | 25% 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 | <i>Activities 1 - 3</i> | 80% - \$20,000 | <i>Activities 1 - 3</i> | 100% - \$25,000 |
| 9120 | | | | |
| 9130 | | | | |
| 9140 | | | | |
| 9150 | | | | |
| 9160 | <i>Activities 1 - 5</i> | 85% - \$32,300 | <i>Activities 1 - 5</i> | 100% - \$38,000 |
| 9170 | <i>Activities 1, 2</i> | 85% - \$10,200 | <i>Activities 1, 2</i> | 100% - \$12,000 |
| 9180 | | | | |
| 9190 | <i>Activities 1, 2, 4</i> | 50% - 1,899 | <i>Activities 1 - 4</i> | 100% - \$4,399 |
| TOTAL | | \$64,399 | | \$79,399 |

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.”

APPENDIX G – COMMENTS BY RESIDENT ADVISORY BOARD

The following comments came out of RAB meetings held on December 9, 1999, January 6, 2000, February 9, 2000, March 7, 2000, March 21, 2000, plus the Public Hearing held on March 22, 2000.

- Section 8 participant suggested contacting City of Ann Arbor Building Dept. to obtain list of owners of rental units, as potential source of landlords to expand Section 8 landlord base.
- Another resident suggested contacting the Tenants Union, to obtain list of “bad” landlords to avoid in Section 8 program.
- Several comments were recorded concerning “safety”, mainly from residents at the two elderly/disabled complexes, which are are not targeted under Drug Elimination Program, but which have live-in police officers. Major concern areas are “undesired” non-residents gaining access to building and a recent rash of unit “break-ins” at one site.
- Disabled resident spoke at Public Hearing concerning federal policies incorporated in Flat rent policy option, Community Service mandate, and Welfare to Work reform policies. Her feelings were that given the currently high percentage of persons/families with disabilities in public housing (perhaps 40% or more), that the federal policies should pay closer attention to the needs of this population. Re Flat Rents, she felt that this new policy while theoretically beneficial to all who may elect it, is realistically a form of discrimination based on de facto exclusion because of the barriers to full employment that persons with disabilities face which effectively preclude them for ever being able to “elect” this option and therefore benefit from it. Re: Community Service: resident felt that this mandatory policy adversely impacts children, the largest and most vulnerable population served in public housing. To tie volunteer work to the lease potentially adds childcare and transportation costs to an already income strapped household. Re: Welfare to Work, which requires taking a job whether it provides a self-supporting income or

not, does not solve any problems. Individual worth is not defined by whether a person works or doesn't work. (It should be noted that Commissioners were very impressed with the comments presented and will draft a letter to congressional representatives on these policy matters.)