
Columbus Metropolitan Housing Authority Plans

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

**PHA Plan
Agency Identification**

PHA Name: Columbus Metropolitan Housing Authority

PHA Number: OH001

PHA Fiscal Year Beginning: (mm/yyyy) 01/2000

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: 960 East Fifth Ave., Columbus, OH 43201
- 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: 960 East Fifth Ave., Columbus, OH 43201
- 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: Columbus Metropolitan Library, 96 S. Grant Ave., Columbus, OH 43215
- PHA website
- Other (list below): 1. Mid-Ohio Regional Planning Commission, 285 E. Main St., 43215
2. City of Columbus Dept. of Trade & Dev., 50 W. Gay St., 3rd Floor, Col., OH 43215
3. The Legal Aid Society of Columbus, 40 West Gay St., Columbus, OH 43215

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)

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

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

A. Mission

Columbus Metropolitan Housing Authority's mission is to provide access to affordable housing and supportive services for families and individuals in collaboration with community partners.

B. Goals

GOAL: Expand our community partnerships and leverage our resources to improve the quality of life for our housing customers

OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES
1. To improve the self-sufficiency of our housing residents by developing employment, training and educational opportunities with community based partners	A. Develop a data bank of resident employment and educational skills	Jan. 1, 2000 thru Sept. 30, 2000	Number of residents in the data bank with the employment skills listed.
	B. Make referrals from the data bank for employment	June 1, 2000 thru Ongoing	Number of placements.
	C. Identify potential funding sources and community partners for employment placement	Jun. 1, 2000 thru Ongoing	Number of partners and the amount of money received.

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OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES
2. To increase access to academic and vocational opportunities for our housing residents through educational providers	A. Develop a resource directory of academic and vocational opportunities	Jan. 1, 2001 thru Dec. 2, 2001	The production of a resource directory.
	B. Meet with academic and vocational providers to develop economic incentives for our housing customers	Jan. 1, 2001 thru Ongoing	Number of active programs, participants and graduates.
3. To improve collaboration with cities in order to increase the delivery of services (ex. Police, Trash removal) to our housing residents	A. CMHA meet with community residents and Council to determine the level of city services offered within their communities	Jan. 1, 2000 thru Dec. 31, 2000	Inventory of services delivered and/or needed.
	B. CMHA meet with city officials to discuss services provided to our residents and develop ways to increase the delivery of current and new services	Jan. 1, 2000 thru Dec. 31, 2001	Improvements in services and the delivery of services to our community residents.
4. To increase customer satisfaction by improving the lines of communication with resident organizations and grass root community organizations	A. Attend Resident Council and grass root community organization's meetings	Jan. 1, 2000 thru Dec. 31, 2004	Number of PICL, Senior Coalition and other Community meetings attended.
	B. Address community residents concerns within	Jan. 1, 2000 thru	Journal of community residents' concerns,

	reasonable time frames (review or develop applicable procedures and time frames)	Dec. 31, 2004	established time frames and actual amount of time it took CMHA to address community residents' concerns. Time to process work orders.
	C. Continue to publish community newsletters	Jan. 1, 2000 thru Dec. 31, 2004	Published newsletters.

OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES
Continuation of #4	D. Develop survey of base line data using PHAS resident survey	Jan. 1, 2000 thru Dec. 31, 2001	Count and analyze survey results for baseline data.
	E. Educate staff to customers and organizational diversity	Jan. 1, 2001 thru Dec. 31, 2002	Number of training classes. Reduction in the number of complaints received.
	F. To meet with social services and non-profit organizations to improve the self-sufficiency of our housing customers	Jan. 1, 2000 thru Dec. 31, 2004	Number of residents participating in other self-sufficiency programs.
5. To improve the public's understanding of our mission to develop and provide access to affordable housing and supportive services	A. Actively make known to the news media CMHA's mission when the opportunity arises	Jan. 1, 2000 thru Dec. 31, 2004	Number of positive news stories.
	B. Improve the physical	Jan. 1, 2000	Landscaping with plants, no

appearances of our communities	thru Dec. 31, 2004	trash in communities and use of the PHAS physical measures.
C. Develop an Annual Report (included format and data needs)	Jan. 1, 2000 thru Dec. 31, 2004	Production of Annual Reports.

GOAL: <i>Expand the supply of safe and affordable housing for people in need</i>			
OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES
1. To reduce homelessness by developing housing in partnership with other agencies. (Includes Section 8 vouchers and certificates)	A. Establish and maintain working relationships with the Community Shelter Board and its member agencies	Jan. 1, 2000 thru Ongoing	Number of Section 8 units set aside or dedicated to partner agencies. These agencies will be responsible for lease-up. Number of public housing units designated for use by partner agencies (e.g., permanent housing for homeless families that have successfully completed a transitional housing program).
	B. Review and update current agreements on use of our public housing resources for homeless families	Mar. 31, 2000 thru Ongoing	

	C. Review admission and preference policies (Section 8 and Public Housing) and establish appropriate priorities	Jan. 1, 2000 thru Ongoing	The adoption and preparation of new admission & preference policies.
2. To expand housing choices by providing rental and home ownership opportunities in low poverty area	A. Expand Home ownership program	Jan. 1, 2000 thru Ongoing	An increase in the number of Section 8 and Public Housing units in low poverty areas.
	B. Identify low poverty areas and number of units (S8 and PH) currently in place	Jan. 1, 2000 thru Ongoing	The enrollment of
	C. Initiate Section 8 outreach program to landlords	Jan. 1, 2000 thru Ongoing	

OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES
Continuation of #2	D. Review FMR's and see if they can be raised	Jan. 1, 2000 thru Ongoing	Number of new landlords and units. The number of units developed for homeownership.
	E. Establish Section 8 Homeownership program	Jan. 1, 2000 thru Ongoing	
	F. Publish RFP for sites in low poverty areas for PH elderly/family units	Oct. 1, 1999 thru Ongoing	
3. To assist in the revitalization of designated	A. Continue working with South Linden	Jan. 1, 2000 thru	Number of units developed for home ownership.

neighborhoods (e.g. enterprise community, enterprise zone) through development of affordable housing opportunities	Neighborhood (GLDC, Area Commission, etc.)	ongoing	
	B. Establish collaborative for revitalization of Linton Gardens and the surrounding area	Jan. 1, 2000 thru ongoing	Number of home ownership units developed.
	C. Establish collaborative for revitalization of Taylor Terrace	Jan. 1, 2000 thru June 30, 2001	The development of 100 units of mixed-income housing at Taylor Terrace.
	D. Establish Home ownership program in the Enterprise Community	Jan. 1, 2000 thru Ongoing	The number of participants enrolled in the Home ownership program in the Enterprise Community.
	E. Establish partnership with CHN for the development of scattered sites for the disabled	Jan. 1, 2000 thru Ongoing	Develop 80-100 units of housing for disabled in partnership with CHN.
4. To expand housing units by leveraging funding opportunities	A. Develop partnerships with other agencies to secure grant funding and other types of financial commitments	Jan. 1, 2000 thru ongoing	Increase in the number of participants providing grants and other financial commitments.

GOAL: <i>Improve Customer Service by being More Supportive of Our Customer's Needs</i>			
OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES
1. To provide quality maintenance services to residents	A. Assess existing quality and timeliness of maintenance of occupied units and initial occupancy units	Jan. 1, 2000 thru ongoing	Timeliness in processing work orders, lower vacancy rate, higher resident satisfaction on PHAS survey.
	B. Meet with staff to	May 1, 2000 thru	Performance standard

	develop performance standards	Dec. 30 2000	developed, implemented and monitored.
2. To create better information about CMHA's affordable housing opportunities for prospective tenants	A. Identify potential customers of CMHA housing services	July 1, 2000 thru Sept. 30, 2000	Number of customers identified.
	B. Assess existing policies through meeting and focus groups	Oct. 1, 2000 thru Dec. 31, 2000	Number of meetings and number of policies improved.
	C. Develop a marketing strategy to attract higher income residents	June 1, 2000 thru Dec. 31, 2000	Market plan implemented.
3. To improve our customers' understanding of our leasing and program policies	A. Meet with tenants and Section 8 assisted families to obtain comments about program rules and policies	Oct. 1, 2000 thru Mar. 31, 2001	Reduced number of grievances, improved educational literature.
	B. Meet with employees to obtain input about Low Rent and Section 8 program rules and policies	April 1, 2001 thru June 30, 2001	Number of reduced grievances.
	C. Retain and/or develop new program information in easy to understand language	July 1, 2001 thru Dec. 31, 2002	Number of publications, improved lease up in both conventional and S8 programs.

OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES
4. To create a positive and dynamic work environment which fosters a "we can do it" attitude among our employees	A. Emphasize the recruitment of competent, professional, and people-oriented staff	Jan. 1, 2000 thru ongoing	Skill level of new hire.
	B. Establish a value system that recognizes and rewards team	Mar. 1, 2000 thru Sept. 30, 2000	A system in place.

member's contributions to CMHA's goals and mission		
C. Expand CMHA's professional development and technical training programs in order to retain and promote competent and professional team members	Jan. 1, 2000 thru Dec. 31, 2000	Number of training classes and enrolles.
D. Improve our monitoring and assessment of our progress toward achieving CMHA's mission	Jan. 1, 2000 thru ongoing	Assessment reports in place to monitor progress.

GOAL: *Maintain an Effective, Efficient and Fiscally Accountable Operation*

OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES
1. To expand funding sources and revenues	A. Aggressively pursue the identification of and acquisition of potential funding sources for CMHA and/or its community partners to provide necessary direct or supportive housing programs and services	Jan. 1, 2000 thru Ongoing	Number of programs available to residents, number of new sources and amount of dollars.

<p>B. Advertise and promote programs and activities available through and/or at CMHA communities</p>	<p>Jan. 1, 2000 thru Ongoing</p>	<p>Additional funding sources.</p> <p>Additional income to CMHA and fund reserves.</p> <p>Number of development ventures within the community.</p> <p>Reduction in Tenant Accounts Receivables Report.</p>
<p>C. Continually monitor and modify investment planning opportunities to maximize revenue growth potential</p>	<p>Jan. 1, 2000 thru Ongoing</p>	
<p>D. Leverage funds with community partners to increase the community's investment in program/service development</p>	<p>Jan. 1, 2000 thru Ongoing</p>	
<p>E. Pursue innovative approaches to debt collection</p>	<p>Jan. 1, 2000 thru Ongoing</p>	



OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES
2. Improved decision support	<p>A. Continually assess, evaluate and modify CMHA operations, as needed, to ensure timely, effective and efficient service in compliance with HUD and community requirements</p>	<p>Jan. 1, 2000 thru Ongoing</p>	<p>Reduced time lines for delivery of products and services.</p> <p>Continuous improvement on PHAS and SEMAP evaluations.</p>
	<p>B. Develop information systems to facilitate data gathering and dissemination to aid in the planning, evaluation, forecasting and decision making</p>	<p>Jan. 1, 2000 thru Ongoing</p>	<p>SEMAP, PHAS and other audit findings.</p>
3. Informed and involved staff, clients and landlords	<p>A. Provide mechanism for input from staff, residents, community organizations and interest groups, and landlords into the decision process to enhance agency operations</p>	<p>Jan. 1, 2000 thru Ongoing</p>	<p>Level of response and results of customer satisfaction surveys.</p> <p>Results of PHAS, SEMAP and other audit reports reflecting compliance with HUD policies and guidelines.</p> <p>Community, customer, landlord and staff participation in CMHA sponsored events and activities.</p> <p>New or expanded systems installed.</p>
	<p>B. Develop and implement a marketing campaign to promote CMHA programs, services and activities to landlords, clients, staff and the general public</p>	<p>Jan. 1, 2000 thru Ongoing</p>	
	<p>C. Coordinate the provision of training to staff on program policies, operations and customer service (landlord and</p>	<p>Jan. 1, 2000 thru Ongoing</p>	
	<p>D. Develop automated supports to track and manage customers customer requests</p>	<p>Jan. 1, 2000 thru Ongoing</p>	

for service, catalog waiting list status, etc. and implement tools to handle general info.	
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In addition to the above strategies, five (5) other strategies were developed based upon a study on affordable housing that CMHA funded through a grant from HUD. The study produced in August 1997 was entitled "Providing Affordable Rental Housing in Central Ohio: Market Analysis and Community Strategies". The strategies committed to by CMHA were designed to carry us into the next century. The major players involved were CMHA, City of Columbus, Mid-Ohio Regional Planning Commission, Franklin County Department of Human Services, Community Shelter Board, HUD Columbus Office and Greater Columbus Chamber of Commerce. Broad community participation through focus groups was achieved to be as inclusive as possible. The total report is included with this Five Year Plan and the CMHA strategies are listed below:

- 1) Participate in new development
- 2) Acquire scattered-site existing units
- 3) Invest selectively in preservation projects
- 4) Renovate and deconcentrate existing stock
- 5) Expand housing Opportunity through the Section 8 program

All the CMHA strategies found on pages 82-92 of the report have listed the primary and secondary geographic focus, the stakeholders feedback on keys to success, barriers to overcome and partners.

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

Annual Plan Type:

Standard Plan

Streamlined Plan:

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

Troubled Agency Plan

Executive Summary of the Annual PHA Plan

[24 CFR Part 903.7 9 (r)]

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

The Columbus Metropolitan Housing Authority has prepared this Agency Plan in compliance with Section 511 of the Quality Housing and Work Responsibility Act of 1998. While completing the Plan, the environment continues to shift on us. The

continual evolution of the rules, as well as the uncertainty of our funding, forces us to reevaluate monthly any previous developed plans. The lack of funding from HUD jeopardizes even our basic housing services of the past.

Despite the gloomy financial outlook we have moved forward in an attempt to re-engineer our housing activities. The mission of the Columbus Metropolitan Housing Authority is to provide access to affordable housing and supportive services for families and individuals in collaboration with community partners. To accomplish this mission we developed the following goals:

- ★ Expand our community partnerships and leverage our resources to improve the quality of life for our housing customers
- ★ Expand the supply of safe and affordable housing for people in need
- ★ Improve customer service by being more supportive of our customer's needs
- ★ Maintain an effective, efficient and fiscally accountable operation

Our Annual Plan is based on the premise that if we accomplish our five year goals and objectives we will be working towards the achievement of our mission. The materials set forth in the Annual Plan all lead towards the accomplishment of our goals and objectives. Taken as a whole, they outline a comprehensive approach towards our goals and objectives and are consistent with the Consolidated Plan. Here are just a few of the highlights of our Annual Plan:

- We will test a Site Based Waiting List in The Meadows, Poindexter Village and Post Oak to support customer service, deconcentration and mixed income.
- We will adopt flat rents for all our development based on FMR for the community
- We will work with public/private organizations to redevelop Linton Gardens into a mixed income community.
- We are continuing to support a minimum rent of \$50 to endorse tenant responsibility.
- We will move tenants and demolish Taylor Terrace in preparation for a mixed income development
- We will continue to support tenants moving to work by not requiring

income reporting until their next redetermination.

- ❑ **Deconcentration efforts have been adopted in S8 with rents set at 110% of FMR and exception rents between 110% and 120% of FMR**
- ❑ **A goal of 50% under and 50% more than 30% of AMI has been adopted for Public housing.**
- ❑ **Up to \$25,000 matching funds have been committed for development of a senior housing needs' assessment.**
- ❑ **A new central office will be finalized to help redevelopment in the Four Corners project areas and improve customer service.**
- ❑ **A Home ownership program will be started to support the Four Corners redevelopment.**

In summary, we are on course to improve the condition of affordable housing in the Columbus Metropolitan Housing Authority.

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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:**
 A Admissions Policy for Deconcentration, see page 5 of the Admission & Occupancy Policy
 B FY 2000 Capital Fund Program Annual Statement
 _____ Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)

Optional Attachments:

- C** PHA Management Organizational Chart
 D FY 2000 Capital Fund Program 5 Year Action Plan
 E Public Housing Drug Elimination Program (PHDEP) Plan
 F Comments of Resident Advisory Board or Boards (must be attached if not included in PHA Plan text) To be added at the end of 45-day comment period and public Hearing
 X Other (List below, providing each attachment name)
 Attachment G - Social Service Programs by Community
 Attachment H - Section 8 Administrative Plan
 Attachment I - Pest Control Policy
 Attachment J - Certifications

Supporting Documents Available for Review

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

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
X	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations	5 Year and Annual Plans
X	State/Local Government Certification of Consistency with the Consolidated Plan	5 Year and Annual Plans
	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,	5 Year and Annual Plans

Applicable & On Display	Supporting Document	Applicable Plan Component
	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.	
	Consolidated Plan for the jurisdiction/s in which the PHA is located (which includes the Analysis of Impediments to Fair Housing Choice (AI)) and any additional backup data to support statement of housing needs in the jurisdiction	Annual Plan: Housing Needs
X	Most recent board-approved operating budget for public housing program	Annual Plan: Financial Resources;
X	Public Housing Admissions and (Continued) Occupancy Policy (A&O), which includes the Tenant Selection and Assignment Plan [TSAP]	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public Housing Deconcentration and Income Mixing Documentation: PHA board certifications of compliance with deconcentration requirements (section 16(a) of the US Housing Act of 1937, as implemented in the 2/1899 <i>Quality Housing and Work Responsibility Act Initial Guidance; Notice</i> and any further HUD guidance) and 18. Documentation of the required deconcentration and income mixing analysis	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public housing rent determination policies, including the methodology for setting public housing flat rents <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination

Applicable & On Display	Supporting Document	Applicable Plan Component
X	Schedule of flat rents offered at each public housing development ✓ check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies ✓ check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
X	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation)	Annual Plan: Operations and Maintenance
X	Public housing grievance procedures ✓ check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
X	Section 8 informal review and hearing procedures ✓ check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
X	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant year	Annual Plan: Capital Needs
	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant	Annual Plan: Capital Needs
	Most recent, approved 5 Year Action Plan for the Capital Fund/Comprehensive Grant Program, if not included as an attachment (provided at PHA option)	Annual Plan: Capital Needs
	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans or any other approved proposal for development of public housing	Annual Plan: Capital Needs
X	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition
	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing

Applicable & On Display	Supporting Document	Applicable Plan Component
	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
X	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership
	Policies governing any Section 8 Homeownership program check here if included in the Section 8 Administrative Plan	Annual Plan: Homeownership
	Any cooperative agreement between the PHA and the TANF agency	Annual Plan: Community Service & Self-Sufficiency
X	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program report	Annual Plan: Community Service & Self-Sufficiency
X	The most recent Public Housing Drug Elimination Program (PHEDEP) semi-annual performance report for any open grant and most recently submitted PHDEP application (PHDEP Plan)	Annual Plan: Safety and Crime Prevention
X	The most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U. S.C. 1437c(h)), the results of that audit and the PHA's response to any findings	Annual Plan: Annual Audit
	Troubled PHAs: MOA/Recovery Plan	Troubled PHAs
X	Other supporting documents (optional) (list individually; use as many lines as necessary)	(specify as needed)
	Providing Affordable Rental Housing in Central Ohio	

1. Statement of Housing Needs

[24 CFR Part 903.79 (a)]

The Quality Housing and Work Responsibility Act of 1998 requires that housing authorities set forth in our Annual Plan a Needs Assessment of the housing needs of our jurisdiction, our waiting list and how we plan to address these needs.

The Columbus Metropolitan Housing Authority (CMHA) in collaboration with the City of Columbus, Franklin County, Mid-Ohio Regional Planning Commission, Community Shelter Board, Franklin County Department of Human Services, HUD Columbus Office and the Greater Columbus Chamber of Commerce conducted a market analysis and community strategies relevant to affordable housing. This study completed in August 1997 was and is the most exhaustive Assessment produced for Columbus and Franklin County. This study was initiated by CMHA to examine the impact of significant changes in public and assisted housing at both the federal and local levels and to develop strategies to respond to these changes.

As the report indicates, those that came together at CMHA's request became known as the Replacement Housing Collaborative. This Collaborative soon realized that CMHA is only 5% of the solution. Thus, the Collaborative worked on affordable housing from a community stand point to provide affordable rental housing for low-income Franklin County residents. It is to the credit of the organizations involved and to the community that affordable housing is seen as a community issue and not just the responsibility of the public housing authority.

When we analyze the data in the Providing Affordable Rental Housing in Central Ohio report along with our June 1999 wait list we find the following:

- ✓ There is a 22,000 unit total deficit for extremely low-income households in the study area.
- ✓ The surplus/deficit analysis shows one affordable rental housing unit for every two extremely low-income renters in the study area.
- ✓ The Section 8 Wait list as of June 1999 has 81% of its applicants at or below 30% of median income.
- ✓ The average length of time on the Section 8 Wait List is 21.5 months
- ✓ The Public Housing Wait list as of June 1999 has 86% of its applicants at or below 30% of median income.
- ✓ The average length of time on the Public Housing Wait List is 6.8 months.
- ✓ It would require \$10.63/hr to afford a two bedroom unit at Fair Market Rent
- ✓ At Federal Minimum wage one would have to work 83 hours per week to

afford a two bedroom unit at Fair Market Rent

The Replacement Housing Collaborative with community involvement, developed both CMHA and community strategies. These strategies were based on the following five principles:

- ◆ Use CMHA resources to mobilize the energy and resources of others
- ◆ Provide mixed-income housing environments.
- ◆ Provide affordable units that look like quality market-rate housing.
- ◆ Link housing with employment and services.
- ◆ Meet the housing needs of residents of the local communities in the study area.

The strategies then developed were based on these principles and are intended to compliment each other and build a more comprehensive affordable housing approach. Specific CMHA strategies are listed below and fully delineated on pages 82-92 of the report.

- ◆ Strategy 1 Participate in New Development
- ◆ Strategy 2: Acquire Scattered Site Existing Units
- ◆ Strategy 3: Invest Selectively in Preservation Projects
- ◆ Strategy 4: Renovate & Deconcentrate Existing Stock
- ◆ Strategy 5: Expand Housing Opportunity through the Section 8 Program

As the report indicates, the CMHA strategies can only be accomplished with partners and in a supportive community environment. During the stakeholder feedback, it was clear that many community leaders understood the issue of affordable rental housing but are reticent to take a public stand. Consequently, the community strategies, listed below, were developed with the hope of building that base of community support and to broaden the responsibility. These strategies are detailed on pages 93-96 of the report.

- ◆ Strategy 1: Establish a regional Implementing Body
- ◆ Strategy 2: Create a Community Affordable Housing Fund

- ◆ Strategy 3: Develop Customized Approaches for Each Local Community
- ◆ Strategy 4: Target an Education and Buy-in Effort to Key Stakeholders with an Emphasis on the Business Community
- ◆ Strategy 5: Develop a Support System for Organizations Locating Affordable Units in Non-Traditional Locations
- ◆ Strategy 6: Advocate for HUD and Congress to Provide Maximum Flexibility to Implement the Strategies
- ◆ Strategy 7: Reward Positive Efforts

CMHA and the community will continue to implement these strategies based upon the resources available. Where appropriate and feasible, grants and loans from federal, state, local and private sources will be applied for through innovative proposals geared to the funding guidelines. Priorities and guidelines for programs often change from year to year and our decisions to pursue certain opportunities and resources may also change over the coming years if there are program changes beyond our control.

CMHA will continue, during CY 2000, to bring on line housing that will meet the strategies listed above. Specific projects that will see fruition will be the full acquisition and implementation of Sugar Grove to meet Strategy 2, completion of The Meadows to meet Strategy 1, the beginning demolition and rebuilding of Taylor Terrace to meet Strategy 4, the implementation of 400 Section 8 Welfare to Work vouchers, if the 1999 proposal is successful to meet Strategy 5 and the opening of a new central business office located in the Four Corners development area on Cleveland and 11th Avenue. While the relocation of the business office does not target a specific strategy, it is CMHA's belief that use of our administrative dollars through this relocation effort will contribute to the economic development of the Linden community. Other agencies locating offices in the Four Corners area are the Central Ohio Transportation Authority and the Columbus Police Department. Both will have branch offices in place that will help drive the redevelopment of the area.

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

The following chart is taken from our 1997 Report, "Providing Affordable Rental Housing in Central Ohio: Market Analysis & Community strategies," page -33. This is the report our community is familiar with and what the Consolidated Planning group is also working from in preparing their plan.

SUPPLY AND DEMAND
FOR AFFORDABLE RENTAL HOUSING
CENTRAL OHIO
ESTIMATED 1996

RENTER HOUSEHOLDS AT A SPECIFIED HHLD INCOME

ENTER HOUSEHOLD SIZE	AGE	=OR<30%	31% - 40%	41% - 50%	51% - 60%	61% - 80%1	>80%
TOTAL							
ONE-PERSON	15 - 61	13,057	4,419	4,629	5,702	10,120	52,826
TWO-PERSONS	15 - 61	8,709	3,060	3,660	4,230	8,991	50,269
THREE-PERSONS	15 - 61	6,391	2,302	2,521	2,650	4,329	27,022
FOUR OR MORE PERSONS	15 - 61	8,794	3,277	3,589	3,127	4,244	29,536
ONE-PERSON	62+	7,499	2,538	1,922	1,193	1,193	16,223
TWO-PERSONS	62+	1,308	469	611	593	935	5,537
THREE-PERSONS	62+	187	79	95	67	147	854
FOUR OR MORE PERSONS	62+	209	92	45	81	92	597
TOTAL RENTER HOUSEHOLDS		46,154	16,226	17,071	17,642	30,051	182,865
APARTMENT COMPLEXES							
STUDIO AND ONE-BEDROOM		0	383	6,746	12,399	13,016	34,119
TWO-BEDROOM		0	1,535	8,413	20,176	27,861	63,218
THREE OR MORE BEDROOM		28	37	1,317	2,528	2,881	7,450
TOTAL APARTMENT UNITS			28	1,955	16,476	35,103	7,467
		104,787					
PUBLIC HOUSING/ PROJECT-BASED SECTION 8/236							
STUDIO AND ONE-BEDROOM		2,611	0	0	0	0	2,611
TWO-BEDROOM		6,031	0	0	0	0	6,031
THREE OR MORE BEDROOM		2,862	0	0	0	0	2,862
ELDERLY STUDIO AND ONE-BR		4,276	0	0	0	0	4,276
ELDERLY TWO-BEDROOM		387	0	0	0	0	387
TOTAL SUBSIDIZED RENTALS		16,167	0	0	0	0	16,167
SCATTERED RENTALS							
STUDIO AND ONE-BEDROOM		2,830	4,990	6,409	3,981	2,028	20,759
TWO-BEDROOM		3,400	6,256	9,516	6,485	3,309	29,725
THREE OR MORE BEDROOM		1,836	3,450	4,646	2,861	1,418	14,549

TOTAL SCATTERED RENTALS	8,067	14,697	20,571	13,327	6,754	1,618	65,034
TOTAL RENTER HOUSEHOLDS	46,154	16,226	17,071	17,6421	30,051	55,721	182,865
TOTAL RENTER UNITS	24,262	16,652	37,047	48,430	50,512	9,085	185,988
SURPLUS/DEFICIT OF AFFORDABLE UNITS							
STUDIO AND ONE-BEDROOM	-10,839	-1,584	6,604	9,485	3,731	-14,681	-7,284
TWO-BEDROOM	-6,776	1,891	11,042	19,121	16,768	-26,368	15,677
THREE OR MORE BEDROOM	4,277	118	2,330	2,182	-37	-5,587	-5,272
TOTAL SURPLUS/DEFICIT		-21,8921	4261	19,9761	30,788	20,461	-46,635
	3,123						

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: _____
- U.S. Census data: the Comprehensive Housing Affordability Strategy ("CHAS") dataset
- American Housing Survey data
Indicate year: _____
- Other housing market study
Indicate year: 1996 to 2001 Projection
- Other sources: (list and indicate year of information)

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

Housing Needs of Families on the Waiting List June 1999
Waiting list type: (select one)
<input type="checkbox"/> Section 8 tenant-based assistance
<input checked="" type="checkbox"/> <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)

**Housing Needs of Families on the Waiting List
June 1999**

If used, identify which development/subjurisdiction:

	# of families	% of total families	Annual Turnover
Waiting list total	6,222		* See below
Extremely low income <=30% AMI	5,369	86%	
Very low income (>30% but <=50% AMI)	789	13%	
Low income (>50% but <80% AMI)	64	1%	
Families with children			
Elderly families	24	.4%	
Families with Disabilities	584	9%	
Black	4,684	75%	
White	1,400	23%	
American Indian/ Native	29	.5%	
Asian	36	.6%	
Hispanic	73	.1%	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	1,271	20%	N/A
2 BR	2,913	47%	N/A
3 BR	1,565	25%	N/A
4 BR	392	6%	N/A
5 BR	68	1%	N/A
5+ BR	13	.2%	N/A

Is the waiting list closed (select one)? No **X** Yes

If yes:

B. How long has it been closed (# of months)?

Does the PHA expect to reopen the list in the PHA Plan year? No Yes

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? No Yes

* 6.8 months average length of time to receive housing

**Housing Needs of Families on the Waiting List
June 1999**

Waiting list type: (select one)

Section 8 tenant-based assistance

Public Housing

Combined Section 8 and Public Housing

Public Housing Site-Based or sub-jurisdictional waiting list (optional)

If used, identify which development/subjurisdiction:

	# of families	% of total families	Annual Turnover
Waiting list total	5,581		
Extremely low income <=30% AMI	4,509	81%	
Very low income (>30% but <=50% AMI)	936	17%	
Low income (>50% but <80% AMI)	136	2%	
Families with children			
Elderly families	176	3%	

Families with Disabilities	1,046	19%	
Black	4,228	76%	
White	1,228	22%	
American Indian/ Native	24	.4%	
Asian	52	.9%	
Hispanic	29	.5%	
Characteristics by Bedroom Size (Public Housing Only)	Estimated based on Household Size		
1BR	1,781	32%	N/A
2 BR	2,180	39%	N/A
3 BR	1,307	23%	N/A
4 BR	264	5%	N/A
5 BR	42	1%	N/A
5+ BR	7	0%	
<p>Is the waiting list closed (select one)? No <u>Yes X</u></p> <p>If yes:</p> <p>B. How long has it been closed (# of months)? <u>Since 6/19/99</u></p> <p>Does the PHA expect to reopen the list in the PHA Plan year? No <u>Yes</u></p> <p>Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <u>No</u> Yes</p>			

C. Strategy for Addressing Needs

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

The Wait List for both Public Housing and S8 show a very low number of elderly. There has been community concern around the number of elderly wanting public housing. No good data seems to exist. CMHA is willing to commit up to \$25,0000 as a match to develop a senior data base. Since this data base would help many other community organizations serving seniors, CMHA will only provide money

if other organizations allocate matching funds.

The Wait List of both programs exhibits a high number of people waiting for housing. The reality is that many of those, while on the list, will never be housed because they do not meet the criteria. Every year there is a certain percentage of the wait list that turns over constantly and a portion that remains fairly stable. In the coming program year, CMHA will purge the Wait List and develop guidelines that will give the community insight into the characteristics of those on the wait lists.

CMHA is going to a 50/50 selection process in our public housing. To meet the needs of the very low income we will select 50% of those below 30% of medium income from the wait list and 50% over 30% of medium income to meet HUD's mixed income requirements.

We see more individuals on the wait list with disabilities. To meet this demand and to assure safe housing, CMHA will be looking for community organizations to have supportive services in place for families and individuals so that the prospective tenant can be successfully housed.

(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
- Leverage affordable housing resources in the community through the creation of mixed - finance housing
- Pursue housing resources other than public housing or Section 8 tenant-based assistance.
- Other: (list below)

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

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

Select all that apply

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

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

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

Select all that apply

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

B. Need: Specific Family Types: The Elderly

Strategy 1: Target available assistance to the elderly:

Select all that apply

- Seek designation of public housing for the elderly
- Apply for special-purpose vouchers targeted to the elderly, should they become available
- Other: (list below)

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

Select all that apply

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

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

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

Select if applicable

- Affirmatively market to races/ethnicities shown to have disproportionate housing needs
- Other: (list below) Not necessary since wait list already has those with disproportionate need

Strategy 2: Conduct activities to affirmatively further fair housing

Select all that apply

- Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- Market the section 8 program to owners outside of areas of poverty /minority concentrations
- Other: (list below)

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

(2) Reasons for Selecting Strategies

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

- 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
- Other: (list below)

Statement of Financial Resources

[24 CFR Part 903.79 (b)]

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2000 grants)		
a) Public Housing Operating Fund	\$7,961,910	\$14,468,580
a) Public Housing Capital Fund	\$9,020,667	\$9,020,667
a) Hope VI Revitalization		
a) Hope VI Demolition		
a) Annual Contributions for Section 8 Tenant Based Assistance	\$41,792,210	\$41,722,020

a) Public Housing Drug Elimination Program (including any Technical Assistance Funds)		
a) Resident Opportunity and Self-Sufficiency Grants	\$150,000	\$150,000
a) Community Development Block Grant		
a) Home		
Other Federal Grants (list below)		
2. Prior Year Federal Grants (unobligated funds only) (list below)		
Hope VI Revitalization	\$2,000,000	\$2,000,000
Public Housing Capital Fund	\$5,864,425	\$5,864,425
3. Public Housing Dwelling Rental Income	\$5,939,550	
4. Other Income(list below)		
Interest Income	\$351,830	
Non-dwelling Income	\$22,400	
5. Nonfederal sources (list below)		
Other		
Withdrawal of excess Section 8 Reserves	\$122,700	
Total resources	\$73,225,692	\$73,225,692

Notes:

1. Other grant represents the Economic Development & Supportive Services Grant.
2. Non federal funds are the withdrawal of excess Section Reserves needed to balance Low Rental Housing. Total of \$281,990 needed to balance LRH is made up of \$159,290 income generated in the current year by Section 8 plus

\$122,700 withdrawal of excess Section 8 reserve.

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

(1) Eligibility

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

When families are within a certain number of being offered a unit: (state number)

If on wait-list, we screen at approximately 200 number.

When families are within a certain time of being offered a unit: (state time)

Other: (describe)

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

Criminal or Drug-related activity

Rental history

Housekeeping

Other (describe): Financial Credit History

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?

Three: The Meadows, Poindexter and Post Oaks

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? All Three

3. Yes No: May families be on more than one list simultaneously

If yes, how many lists? Two

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? 50% at or below 30% of median area income

b. Transfer policies:

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

- Emergencies
- Overhoused
- Underhoused
- Medical justification
- Administrative reasons determined by the PHA (e.g., to permit modernization work)
- Resident choice: (state circumstances below)
- Other: (list below)
504 over new admissions

a. 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**)

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

Former Federal preferences:

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

Other preferences: (select below)

- Working families and those unable to work because of age or disability
- Veterans and veterans' families
- ___ Residents who live and/or work 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) **Executive Director's Decision**

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

1 Date and Time

Former Federal preferences:

- ___ Involuntary Displacement (Disaster, Government Action, Action of Housing)

- Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden

Other preferences (select all that apply)

- 1 Working families and those unable to work because of age or disability *
- 1 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
- 2 Other preference(s) (list below)

* Disability individuals with supportive services

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): Telephone Inquiries

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

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

(6) Deconcentration and Income Mixing

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

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

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

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

Employing waiting list "skipping" to achieve deconcentration of poverty or income mixing goals at targeted developments
If selected, list targeted developments below: All developments based on data tracking reports.

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

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)
Adopted Flat Rent

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

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

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

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

B. Section 8

(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): Landlords may review file if tenant release is granted.

(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:

1. Can't locate unit within 60 days

2. Medical Reason

3. Any other reasonable request.

(If we must close application or reduce the number of vouchers under lease there is no extension)

(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

- 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): Those not in subsidized housing currently and Executive Director's decision

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

____ Date and Time

Former Federal preferences

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

Other preferences (select all that apply)

- ____ Working families and those unable to work because of age or disability
- 1 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
- 1 Other preference(s) (list below): Those not in subsidized housing and Executive Director's decision

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

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

5. If the PHA plans to employ preferences for "residents who live and/or work in the jurisdiction"

(select one)

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

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

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

(5) Special Purpose Section 8 Assistance Programs

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

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

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

- Through published notices
 Other (list below): Work with community agencies serving the special purpose population

4. PHA Rent Determination Policies

[24 CFR Part 903.79 (d)]

A. Public Housing

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

(A) Income Based Rent Policies

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

- The PHA will not employ any discretionary rent-setting policies for income based rent in public

housing. Income-based rents are set at the higher of 30% of adjusted monthly income, 10% of unadjusted monthly income, the welfare rent, or minimum rent (less HUD mandatory deductions and exclusions). (If selected, skip to sub-component (2))

---or---

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

b. Minimum Rent

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

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

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

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

a. 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:

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

For the earned income of a previously unemployed household member

- For increases in earned income
- Fixed amount (other than general rent-setting policy)
 - If yes, state amount/s and circumstances below:
- Fixed percentage (other than general rent-setting policy)
 - If yes, state percentage/s and circumstances below:
- For household heads
- For other family members
- For transportation expenses
- For the non-reimbursed medical expenses of non-disabled or non-elderly families
- Other (describe below)

e. Ceiling rents

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

- Yes for all developments
- Yes but only for some developments
- No

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

- For all developments
- For all general occupancy developments (not elderly or disabled or elderly only)
- For specified general occupancy developments
- For certain parts of developments; e.g., the high-rise portion
- For certain size units; e.g., larger bedroom sizes
- Other (list below)

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

apply)

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

f. Rent re-determinations:

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

- Never
- At family option
- Any time the family experiences an income increase
- Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold) _____
- 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)

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).**

(1) Payment Standards

Describe the voucher payment standards and policies.

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

- ____ At or above 90% but below 100% of FMR
____ 100% of FMR
 Above 100% but at or below 110% of FMR
 Above 110% of FMR (if HUD approved; describe circumstances below)

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

- ____ FMRs are adequate to ensure success among assisted families in the PHA's segment of the FMR area
____ The PHA has chosen to serve additional families by lowering the payment standard
____ Reflects market or submarket
____ Other (list below)

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

- FMRs are not adequate to ensure success among assisted families in the PHA's segment of the FMR area
 Reflects market or submarket
 To increase housing options for families
 Other (list below):
To help in deconcentration for suburban communities.

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):

5. Operations and Management

[24 CFR Part 903.79 (e)]

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.
See Attachment 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	Expected
--------------	-------------------	----------

	Served at Year Beginning	Turnover
Public Housing	4000	850
Section 8 Vouchers	1873	187
Section 8 Certificates	4319	431
Section 8 Mod Rehab	161	16
Special Purpose Section 8 Certificates/Vouchers (list individually)	682	68
Public Housing Drug Elimination Program (PHDEP)		
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)
Admission & Occupancy Policy - Available at 960 E. Fifth Avenue, Columbus, OH

43201

- **Property Management Maintenance -Available at 960 E. Fifth Avenue, Columbus, OH**

43201

- **Pest Control - Attachment I**

- **Personnel Policy - Available at 960 E. Fifth Avenue, Columbus, OH 43201**

(2) Section 8 Management: (list below)

- Administrative Plan - **Available at 960 E. Fifth Avenue,
Columbus, OH 43201**
- Personnel Policy - **Available at 960 E. Fifth Avenue,
Columbus, OH 43201**

6. PHA Grievance Procedures

[24 CFR Part 903.7 9 (f)]

A. Public Housing

1. ____ Yes X 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)
- X PHA main administrative office
 - ____ PHA development management offices
 - ____ Other (list below)

B. Section 8 Tenant-Based Assistance

1. ____ Yes X 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)
- X 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

Select one:

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

-or-

See Attachment B

_____ 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

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)

-or-

See Attachment D

_____ 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.

o: 2577-0226
: 03/31/2002

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: Rosewind, The Meadows and additional off-sites

2. Grant Number: OH16URD001I194

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:	Taylor Terrace
1b. Development (project) number:	
2. Activity type:	<input checked="" type="checkbox"/> Demolition <input type="checkbox"/> Disposition
3. Application status (select one)	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date application approved, submitted, or planned for submission:	<u>28/07/99</u>
5. Number of units affected:	261
Coverage of action (select one)	<input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity:	
a. Actual or projected start date of activity:	<u>01/09/99</u>
b. Projected end date of activity:	<u>03/12/01</u>

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

<input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date application approved, submitted, or planned for submission: (12/08/99)
5. Number of units affected: <u>70</u> Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: <u>01/10/99</u> b. Projected end date of activity: <u>01/10/00</u>

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

[24 CFR Part 903.7 9 (i)]

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

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

2. Activity Description

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

<u>Designation of Public Housing Activity Description</u>	
1a. Development name:	N/A
1b. Development (project) number:	

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

10. Conversion of Public Housing to Tenant-Based Assistance

[24 CFR Part 903.7 9 (j)]

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:	N/A
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)	
<input type="checkbox"/>	Units addressed in a pending or approved demolition application (date submitted or approved:)
<input type="checkbox"/>	Units addressed in a pending or approved HOPE VI demolition application (date submitted or approved:)
<input type="checkbox"/>	Units addressed in a pending or approved HOPE VI

Revitalization Plan (date submitted or approved:)
<input type="checkbox"/> Requirements no longer applicable: vacancy rates are less than 10 percent
<input type="checkbox"/> Requirements no longer applicable: site now has less than 300 units
<input type="checkbox"/> 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. <u>Development name</u>	1b. <u>Development (project) number</u>
* Trevitt Heights	1-11
* Brittany Hills	1-17
* Brittany Hills	1-22
* Scattered Sites	1-23
* Alice Rita	1-24
* Brittany Hills	1-25
* Glencreek/Crestwood	1-26
* Russell Leach	1-27

2. Federal Program authority:

_____ HOPE I

X HOPE III

Size of Program: CMHA is working with the Columbus Housing Partnership, Inc. on 24 of our scattered site homes. They are taking homes that need lead abatement and remodeling them for resale. They have 11 of the homes in the process of being remodeled.

Pricing the Homes: After remodeling and appraisal the homes are expected to range from \$34,000 to \$38,000 in price.

Financing: The CHP will work with the selected applicants to qualify for a loan through FHA for first time home buyers.

Selection Criteria: CHP has 6 applicants already. The criterion is that the applicants meet low-income status, are employed and have a decent credit history.

Associated Counseling and Training: If the applicant has a poor credit history, credit counseling is required.

Resale Restrictions: No resale for 15 years and no subletting. The profit from the sale of the house goes to CHP to cover the cost of remodeling or for future endeavors.

Results of the Program: If the eleven remodel homes sell well, CMHA in partnership with CHP will file with HUD for an extension of time to complete the final 13 homes.

LINTON GARDENS / SOUTH LINDEN

CMHA is exploring the development of a homeownership program in partnership with local non-profits in the South Linden to help develop the Linton Gardens site. Linton Gardens has been torn down and land is available for development.

_____ 5(h)
X _____ Turnkey III Section 32 of the USHA of 1937
(effective 10/1/99)

Size of Program: The Columbus Metropolitan Housing Authority is in the process of finalizing this program which started in 1971 with 948 units. 809 units have been purchased and 137 units were converted to our conventional public housing. The remaining two units will be sold probable by the time this Plan is put into effect in CY 2000.

_____ Section 32 of the USHA of 1937 (effective 10/1/99)

nnn **Pricing the Homes:** The prices of the homes ranged from \$50,000 to \$80,000 depending on bedroom size.

Financing: Financing was arranged through any bank or mortgage company that would approve the prospective buyer for a loan. Those in public housing had two escrow accounts that were put toward the down payment.

Participation Selection Criteria: Participants were selected from public housing tenants and low-income applicants. The prospective buyer must have employment, a fair credit history and able to obtain a loan.

Associated Counseling and Training: Counseling was provided and included what it meant to buy a home, how to take and maintain a home and credit counseling.

Resale Restrictions: Resale restrictions were in place for the first five years after the sale. Within the five years a pro-rata portion of the fund had to be returned to CMHA.

3. Application status: (select one)

- Approved; included in the PHA's Homeownership Plan/Program
- Submitted, pending approval
- Planned application

B. Section 8 Tenant Based Assistance

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

2. Program Description:

a. Size of Program

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

If the answer to the question above was yes, which statement best describes the number of

- participants? (select one)
- 25 or fewer participants
 - 26 - 50 participants
 - 51 to 100 participants
 - more than 100 participants

b. PHA-established eligibility criteria

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

12. PHA Community Service and Self-sufficiency Programs

[24 CFR Part 903.7 9 (l)]

See Attachment G for listing of all service programs by community

A. PHA Coordination with the Welfare (TANF) Agency

1. Cooperative agreements:

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

If yes, what was the date that agreement was signed? DD/MM/YY

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)
Urban League	350	Meet TANF	Urban League	Public Housing
		30 months dependency	Indian Meadows	
			Thornwood	
			Lincoln Park	

(2) Family Self Sufficiency programs

a. Participation Description

Family Self Sufficiency (FSS) Participation		
Program	Required Number of Participants (start of FY 2000 Estimate)	Actual Number of Participants (As of: DD/MM/YY)
Public Housing	N/A	N/A
Section 8	375	July 31, 1999 - 379

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:

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 903.7 9 (m)]

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

1. Describe the need for measures to ensure the safety of public housing residents (select all that apply)

- High incidence of violent and/or drug-related crime in some or all of the PHA's developments
- High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to the PHA's developments
- Residents fearful for their safety and/or the safety of their children
- Observed lower-level crime, vandalism and/or graffiti
- People on waiting list unwilling to move into one or more developments due to perceived and/or actual levels of violent and/or drug-related crime
- Other (describe below)

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

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

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

Pointdexter Village	240 N. Champion Ave.
Riverside Bradley	241 McDowell Street
Lincoln Park	1755 South 20 th Street
Sawyer Manor	940 Caldwell Place
Trevitt Heights	940 Caldwell Place
Sunshine Terrace	241 McDowell Street
Sunshine Annex	241 McDowell Street
Worley Terrace	99 South Central Avenue
Sawyer Towers	525 Sawyer Boulevard
Bollinger Towers	750 North High Street

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

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

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

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

Same as above in 13, A, 3

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)

Same as listed above in 13, A, 3

D. Additional information as required by PHDEP/PHDEP Plan

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

Yes **No: Is the PHA eligible to participate in the PHDEP in the fiscal year covered by this PHA Plan?**

Yes **No: Has the PHA included the PHDEP Plan for FY 2000 in this PHA Plan?**

Yes **No: This PHDEP Plan is an Attachment. (Attachment Filename: ___)**

14. RESERVED FOR PET POLICY
 [24 CFR Part 903.79 (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?
If not, when are they due (state below)?

17. PHA Asset Management

[24 CFR Part 903.7 9 (q)]

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

High performing and small PHAs are not required to complete this component.

1. Yes ___ No: Is the PHA engaging in any activities that will contribute to the long-term asset management of its public housing stock , including how the Agency will plan for long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs that have not been addressed elsewhere in this PHA Plan?

2. What types of asset management activities will the PHA undertake? (select all that apply)

- Not applicable
- Private management
- Development-based accounting
- Comprehensive stock assessment
- Other: (list below)

3. ___ Yes No: Has the PHA included descriptions of asset management

activities in the optional Public Housing Asset Management Table?

18. Other Information

[24 CFR Part 903.7 9 (r)]

A. Resident Advisory Board Recommendations

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

2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)

Attached at Attachment (File name)

Provided below:

SENIOR COMMUNITIES: The main concern of residents within CMHA's Senior Communities is the mixing of mentally disabled individuals with the elderly. CMHA is in agreement, but with Fair Housing regulations CMHA can not deny the disabled if no senior is on the wait list.

FAMILY COMMUNITIES: Residents within CMHA's Family Communities had two concerns:

(1) Residents were against pets being allowed in the family communities. CMHA supports "no pets" in family developments.

(2) Residents are interested in becoming vendors for CMHA and would like to know the process in order to become a vendor. CMHA will refer tenants to local training programs.

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

- Considered comments, but determined that no changes to the PHA Plan were necessary.
- The PHA changed portions of the PHA Plan in response to comments
- List changes below:
- 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

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): Mayoral Appointment

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):

Mayor choose from list of active resident council officers.

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):

All Resident Council officers are elected by the individual community. Elected eligible candidates are adult members of the respective communities.

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)

Franklin County, Ohio
City of Columbus, Ohio

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

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

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

D. Other Information Required by HUD

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

ATTACHMENTS

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

ATTACHMENT A

**COLUMBUS METROPOLITAN HOUSING AUTHORITY
ADMISSION & OCCUPANCY POLICY**

Prepared for Low Income Public Housing Department

November 1999

NOTES:

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*Admissions and Occupancy Policy Governing
HUD-Assisted Low Rent Public Housing Operated by
Columbus Metropolitan Housing Authority (CMHA)*

I. BACKGROUND

A.

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III. GENERAL STATEMENT OF POLICIES AND OBJECTIVES

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Purpose

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.....Pro
vide a standard policy which will enable CMHA staff to administer the
Public Housing Program consistently and fairly.

b

.....Pro
vide an ongoing training document for both experienced and newly hired
staff.

c

.....Pro
vide answers to the Public Housing Program questions that are beyond the scope of the
federal regulations.

d

.....Pro
vide CMHA residents and other members of the public with a basis for CMHA
decisions.

IV. ELIGIBILITY FOR ADMISSION AND PROCESSING OF APPLICATIONS

A.

Nondiscriminati

1. It is the policy of CMHA to comply with the Housing and Community Development Act of 1974 and the Fair Housing Amendments Act of 1988), Executive Order 11063, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Title II of the Americans with Disabilities Act (to the extent that it applies, otherwise Section 504 and the Fair Housing Amendments govern), any applicable State laws or local ordinances and any legislation protecting the individual rights of tenants, applicants or staff that may subsequently be enacted. (24 CFR § 960.203)
2. CMHA will not accept applications for housing covered by a contract for annual contributions under the United States Housing Act of 1937, as amended, or in the use or occupancy thereof.¹ (24 CFR § 100.5)
3. CMHA will not accept applications for housing that:
 - a. Deny to any family the opportunity to apply for housing, nor deny to any qualified applicant the opportunity to lease housing suitable to its needs;
 - b. Provide offers of housing different from housing provided others based on Fair Housing Amendments;
 - c. Subject a person to segregation or disparate treatment;
 - d. Restrict a person's access to any benefit enjoyed by others in connection with the housing program;
 - e. Treat a person differently in determining eligibility or other requirements for admission;
 - f. Deny a person access to the same level of services; or
 - g. Deny a person the opportunity to participate in a planning or advisory group which is an integral part of the housing program.
4. CMHA will not automatically deny admission to a particular group or category of otherwise qualified applicants. Each applicant in a particular group or category must be treated on an individual basis in the normal processing routine. (24 CFR § 960.205)
5. CMHA will identify and eliminate situations or procedures that create a barrier to equal housing opportunity for all. In accordance with Section 504,

¹ Under certain very specific conditions described in the Housing and Community Development Act of 1992, PHA is permitted to designate occupancy of certain developments for older persons (including elderly people with disabilities).

and the Fair Housing Amendments Act of 1988 HA will make structural modifications to its housing and non-housing facilities (24 CFR §§ 8.21, 8.23, 8.24, and 8.25) make reasonable accommodations (24 CFR § 100.204), or combinations of the two, to permit people with disabilities to take full advantage of the housing program.

- a. In making reasonable accommodations or structural modifications for otherwise qualified persons with disabilities, CMHA is **not** required to:
 - i. In an existing housing program, make each of its existing facilities accessible [24 CFR § 8.24 (a) (1)]; or make structural alterations when other methods can be demonstrated to achieve the same effect; [24 CFR § 8.24 (b)]
 - ii. Make structural alterations that require the removal or altering of a load-bearing structural member [24 CFR § 8.32 (c)]
 - iii. Provide an elevator in any multifamily housing project solely for the purpose of locating accessible units above or below the grade level; [24 CFR § 8.26]
 - iv. Take any action that would result in a fundamental alteration in the nature of the program ; [24 CFR § 8.24 (a) (2)]
 - v. Take any action that would result in an undue financial and administrative burden on the Authority. [24 CFR § 8.24 (a) (2)]

6. CMHA will not permit these policies to be subverted to do personal or political favors. Accepting an applicant from a lower waiting list position before one in a higher position violates policy, federal law, and the civil rights of the other families on the waiting list. (24 CFR § 906. 204 (a)(3)(ii))

B. Accessibility and Plain Language

1. Facilities and programs used by residents must be accessible. Application and management offices, hearing rooms, community centers, laundry facilities, craft and game rooms and so on must be available for use by residents with a full range of disabilities. If these facilities are not already accessible (and located on accessible routes), they will be made so, subject to the undue financial and administrative burden test. (24 CFR § 8.20 and 8.21)
2. Documents intended for use by applicants and residents will be made available in formats accessible for those with vision or hearing impairments (24 CFR § 8.6).
3. Some of the concepts that must be described relative to eligibility, rent computation, applicant screening, reasonable accommodations, and lease compliance is complicated, but offering examples will help applicants and

residents understand the issues involved. In writing materials to be used by applicants and residents, CMHA staff must keep in mind that mental retardation, learning disabilities and cognitive disabilities may affect the applicant's ability to read or understand – so rules and benefits may have to be explained verbally – perhaps more than once. (24 CFR § 8.6)

4. At the point of initial contact CMHA staff will ask all applicants whether they need some form of communication other than plain language paperwork. (24 CFR § 8.6)
5. Some applicants will not be able to read (or to read English), so intake staff must be prepared to read and explain anything that they would normally hand to an applicant to be read or filled out. Applicants who read or understand little English may furnish an interpreter who can explain what is going on. [24 CFR § 8.6])
6. At a minimum CMHA will prepare the following information in plain- language accessible formats:
 - a. Marketing and informational materials
 - b. Information about the application process
 - c. The application form
 - d. All form letters, notices, to applicants and residents
 - e. General statement about reasonable accommodation
 - f. Orientation materials for new residents
 - g. The lease and house rules (if any)
 - h. Guidance or instructions about care of the housing unit
 - i. Information about opening, updating or closing the waiting list
 - j. All information related to applicants' rights (to informal hearings, etc.)

C. Marketing

1. It is the policy of CMHA to conduct outreach as needed to maintain an adequate application pool representative of the eligible population in the area. Outreach efforts will take into consideration the level of vacancy in the HA's units, availability of units through turnover, and waiting list characteristics. CMHA will periodically assess these factors in order to determine the need for and scope of any marketing efforts.
2. Marketing and informational materials will be subject to the following:
 - a. All marketing materials must comply with Fair Housing Act requirements with respect to wording, logos, size of type, etc. [24 CFR §109.30(a)];
 - b. Marketing should be "plain language" and should use more than strictly English-language print media;

- c. An effort should be made to target all agencies that serve and advocate for potentially qualified applicants (e.g. the disabled, to ensure that accessible/adaptable units are used by people who can best take advantage of their features).
 - d. Marketing materials should make clear who is eligible: individuals and families, people with both physical and mental disabilities. D. Qualification for Admission
1. It is CMHA's policy to admit only qualified applicants². Clients are interviewed without an appointment if gainfully employed or by a scheduled appointment if not gainfully employed and/or are disabled.
 2. An applicant is qualified if he or she meets all of the following criteria:
 - b. Is a family as defined in Section 13 Definition 14 of this policy³;
 - c. Heads a household where all members of the household are citizens or eligible non-citizens; (24 CFR § 200, and §912.5 through 912.14)
 - d. Has an Annual Income at the time of admission that does not exceed the low or very low income limits for occupancy established by the Department of Housing and Urban Development.
 - d. Provides a copy of the Social Security card for all family members or can document and certify that they do not have Social Security numbers; (24 CFR § 913.109)
 - e. Meets or exceeds the Applicant Selection Criteria, including completion of a CMHA-approved pre-occupancy class; (24 CFR § 960.205)
 - f. Is not currently adequately housed in a CMHA dwelling unit. Applicants who are listed on a current CMHA dwelling lease (or is part

² We have used the term “qualified” to refer to applicants who are eligible and able to meet the applicant selection standards. This term is taken from the 504 : 24 CFR § 8.3 Definition of qualified individual with disabilities. Eligibility is a term having specific meaning under the Housing Act of 1937. In order to be eligible a family must meet four tests: (1) they must meet PHA's definition of family; (2) have an Annual Income at or below program guidelines; (3) each family member must have a social security number and card or certify that he/she has no number; and (4) each family member must be a citizen or non-citizen with eligible immigration status per 24 CFR § 912.5. The final rules on citizenship were published in the Fed. Register 20 March 1995, effective 19 June 1995.

³ **Family** - Two or more persons regularly living together, related by blood, marriage, adoption, guardianship or operation of law and will live together in PHA housing; OR two or more persons who are not so related, but are regularly living together, can verify shared income or resources, and will live together in PHA housing. **The term family also includes:** Elderly family, disabled family, single person a foster care arrangement, or a kinship care arrangement. Other persons, including members temporarily absent, may be considered a part of the applicant family's household if they are living or will live regularly with the family. [24 CFR 912 and 960] Live-in Aides may also be considered part of the applicant family's household. However, live-in aides are not considered family members and have no rights of tenancy.

of the household as verified by CMHA records) and reside in a unit meeting the occupancy standards for the family size is not qualified for admission and will not be placed on the waiting list for new applicants.

E. Waiting List Management

1. It is the policy of CMHA to administer its waiting list as required by the regulations at 24 CFR §§ 912, 913, 945, 960.201 through 960.215 and the applicable Local Admission Preferences adopted by the Authority.
2. Opening and Closing Waiting Lists
 - a. CMHA may restrict application intake, suspend application intake, and close waiting lists in whole or in part. CMHA may open or close the list by ranking, or local preference category. See (c) below (24 CFR § 960.211).
 - b. CMHA will update the waiting list at least once a year by removing the names of those families who are no longer interested, no longer qualify for housing, or cannot be reached by telephone and/ or mail.
 - c. If CMHA's highest waiting list preference category has sufficient applications to fill anticipated vacancies for the coming 12 months, CMHA may elect to: (a) close the waiting list completely; (b) close the list during certain times of the year; or (c) restrict intakes by preference, type of project, or by size and type of dwelling unit [24 CFR 960.211(c)].
 - d. Decisions about closing the waiting list will be based on the number of applications available for a particular size and type of unit, the number of applicants who qualify for a Preference, and the ability of CMHA to house an applicant in an appropriate unit within a reasonable period of time [24 CFR 960.211(c)]. A decision to close the waiting lists, restricting intake, or opening the waiting lists will be publicly announced.
 - e. During the period when the waiting list is closed, CMHA will not maintain a list of individuals who wish to be notified when the waiting list is reopened.
3. Waiting Lists and the Local Preferences
 - a. During periods when the Waiting List is open and CMHA is not accepting new applications, CMHA will place an applicant on the waiting list if the applicant is otherwise eligible for assistance AND claims that he or she qualifies for a Local Preference. (24 CFR § 960.207)
 - i. Category 1 - Families earning less than 30% of median income

as adjusted for family size will be ordered by date of application receipt. Incomes will be verified prior to admission. If income increases beyond 30% of median income, applicants may elect to be transferred to the Category 2 list or to retain their position on the Category 1 list. If an election is made to transfer to the Category 2 list, placement will be made based upon the original date of application receipt. It is the applicant's responsibility to report in writing any changes in income.

- ii. Category 2 - Families earning 30% or more of the median income as adjusted for family size will be ordered by date of application receipt. Incomes will be verified prior to admission. Failure to meet the income test at the time of admission will result in transfer to the Category 1 list with placement based upon the original date of application.
- iii. Statutory Preferences - in either list, in accordance with State law, applicants with veterans' status will be given priority over any other member of that grouping. The foregoing public housing admission selection policies do not affect the statutory admissions preference of the elderly, disabled or displaced over other singles set forth in 24CFR 912.3 and 950.301 (d) of the program regulations.
- iv. Emergency Preferences - program eligible applicants meeting the following criteria may be placed at the top of the waiting list for the public housing program and may be admitted to the next available appropriately sized public housing unit. The rental term/ lease agreement for all such placement must be for a minimum of one year.

Families currently residing in homes declared unfit for habitation by a government agency. This condition must not have been caused by the resident.

An applicant or family member who has a mobility or other impairment that makes the person unable to use critical elements of the

housing unit, and the owner is not legally obligated to make reasonable accommodation by making changes to the unit. Referrals must be made by an officialy recognized agency whose primary purpose is to provide assistance to persons with disabilities.

- iv. Executive Preferences - the Executive Director of designee has the authority to elect preferences and make decisions

regarding preferences in special circumstances ie. witness protection, domestic abuse, etc.

- b. EXCEPT THAT, CMHA may refuse to place such a Local Preference applicant if the following are true:
 - i. There is an adequate pool of applicants already on the waiting list who are likely to qualify for a Local Preference; and [See 24 CFR § 960.207 (b) (1)]
 - ii. It is unlikely that under CMHA's system for applying the Local Preferences that the family making the application could qualify for assistance ahead of other applicants already on the waiting list. [See 24 CFR § 960.207 (b) (2)]
- c. The determination in (b) above is based on the Local Preference system described in these policies, the preference or preferences claimed by applicants already on the waiting list, and the preference or preferences claimed by the applicant seeking placement on the waiting list.

4. Determining if the Waiting List may be Closed

CMHA will use its Procedure pertaining to Waiting List Closure⁴ to determine whether the waiting list(s) may be closed.

5. Change in Preference Status While on the Waiting List

- a. Occasionally families on the waiting list who did not qualify for a Local Preference at the time of application intake will experience a change in circumstances that qualifies them for a Preference. In such instances, it will be the family's duty to contact CMHA so that their status may be certified or, depending on application processing status, re-verified.
- b. To the extent that CMHA determines that the family does now qualify for a Preference, they will be moved up on the waiting list in accordance with any local or ranking preference(s) and their date and time of application. [24 CFR § 960.212 (c) (2)]

⁴ This policy refers to written procedures that cover, in this case, the closing of the waiting list. References to other administrative procedures is made periodically in the text of this policy. These procedures are separate documents that describe the work steps necessary to implement the policy choices made in this document.

6. Removal of Applications from the Waiting List

CMHA will not remove an applicant's name from the waiting list except in accordance with its Procedure pertaining to Removing Applications from the Waiting List - Exhibit 2

F. Processing Applications for a unit offer and admission

1. It is CMHA's policy to accept and process applications in accordance with applicable HUD Regulations. Applications will be received and processed according to CMHA's Procedure — Intake and Processing.
2. Interviews and Verification Process
 - a. As families approach the top of the waiting list, the following items will be verified according to CMHA's Procedure Verification, to determine qualification for admission to public housing:
 - i. Family composition and type (elderly/non-elderly)
 - ii. Annual Income
 - iii. Assets and Asset Income
 - iv. Allowance Information
 - v. Local Preferences
 - vi. Social Security Cards & Numbers of all Family Members
 - vii. Information Used in Applicant Screening
 - viii. Citizenship or eligible immigration status
 - ix. Training & Self-sufficiency Programs
 - b. CMHA's first choice is a written third party verification to substantiate applicant or resident claims. If unable to obtain third party verifications, CMHA may use phone verifications with the results recorded in the file, dated, and signed by CMHA staff, review of documents, and, if no other form of verification is available, applicant certification. Applicants must cooperate fully in obtaining or providing the necessary verifications.
 - c. Verification of citizenship or eligible immigration status will be carried out pursuant to 24 CFR § 912.8 using the Immigration and Naturalization Service's (INS) SAVE system and, if needed, a manual search of INS records.
3. If a "zero income" family is admitted, every sixty days re-determinations of income will be performed. (See Section 6. C, Periodic Reexaminations, of this policy.)

4. CMHA's records with respect to applications for admission to any low-income housing assisted under the United States Housing Act of 1937, as amended, will indicate for each application the date and time of receipt; the determination by CMHA as to eligibility or ineligibility of the applicant; when eligible, the unit size for which eligible, the preference rating, if any, and the date, location, identification, and circumstances of each vacancy offered and accepted or rejected.

G. The Preference System

1. It is CMHA's policy that a preference does not guarantee admission. Preferences are used to establish the order of placement on the waiting list. Every applicant must still meet CMHA's Resident Selection Criteria before being offered a unit.
2. Preferences will be granted to applicants who are otherwise qualified and who, at the time they are certified for admission meets the definitions of the preferences described below.
3. If there are no applicants on the waiting list(s) that qualify for the local preferences, otherwise eligible non-preference families will be selected.
4. Factors other than preferences that affect the selection of applicants from the waiting list [24 CFR § 960.211 (b)(1)] — Before applying its preference system, CMHA will first match the characteristics of the available unit to the applicants available on the waiting lists. Factors such as unit size, accessible features, or units in housing designated for the elderly or disabled, limit the admission of families to those households whose characteristics “match” the characteristics and features of the vacant unit available.

By matching unit and family characteristics, it is possible that families lower on the waiting list may receive an offer of housing ahead of families with an earlier date and time of application, or ahead of families with preferences e.g. the next unit available is an accessible unit and the only applicant family needing such features is in the non-preference pool (no local preference).

Factors other than the preference systems that affect applicant selection for unit offers are described below:

- a. When selecting a family for a unit with accessible features, CMHA will give a preference to families that include persons with disabilities who can benefit from the unit's features. Physically disabled persons will be identified by a red folder.
- b. If no family can be found for a unit with accessible features, CMHA will house a family not needing the unit features subject to the procedures

described in the Tenant Selection and Assignment Plan.

- c. When selecting a family for a unit in housing designated for elderly families or housing designated for disabled families, CMHA will give a preference to elderly or disabled families.
 - d. When selecting a family for a unit in a mixed population housing (the property houses both elderly and disabled families) CMHA will give a preference to elderly families and disabled families.
 - e. When selecting a single person for a unit in a mixed population housing, elderly or disabled single persons have preference over singles who are neither elderly nor disabled. [24 CFR § 960.407]
 - f. Any admission mandated by court order related to desegregation or Fair Housing and Equal Opportunity will take precedence over the Preference System. Other admissions required by court order will also take precedence over the Preference System.
5. Preference System — CMHA will use local preferences in its preference system.
 6. CMHA will not give a preference to an applicant if any member of the applicant family is a person evicted because of drug-related criminal activity from housing assisted under the 1937 Housing Act. [24 CFR 960.211 (b) (3)] CMHA may give an admission's preference in any of the following cases:
 - a. If CMHA determines that the evicted person has successfully completed a rehabilitation program approved by CMHA;
 - b. If CMHA determines that the evicted person clearly did not participate in or know about the drug-related criminal activity; or
 - c. If CMHA determines that the evicted person no longer participates in any drug-related criminal activity.
 7. The preference system described above will work in combination with requirements to match the characteristics of the family to the type of unit available, including units with targeted populations. When such matching is required or permitted by current law CMHA will give preference to the families described below. The ability to provide preferences for some family types will depend on unit size available.
 - a. Units designated for the elderly⁵ (24 CFR §§ 945.201, 945.105, 945.203, and 945.303) — in accordance with the 1992 Housing Act

⁵ This reference is to buildings or portions of buildings designated for the elderly by following the requirements of the 1992 Housing Act. Designation of housing for the elderly requires the preparation of an allocation plan. A public hearing must be held on the plan and the plan must be presented to HUD for review and approval.

elderly families with a head, spouse or sole member at least 62 years of age will receive a preference for admission to such units or buildings covered by a HUD-approved Allocation Plan.

- i. When there are insufficient elderly families on the waiting list, near-elderly families (head or spouse ages 50 to 61) may receive a preference for this type of unit.
 - ii. When there are insufficient elderly or near-elderly families and units are ready for leasing more than 60 days all other family types are eligible for such units.
 - iii. Units with accessible features — Families with members who require a unit with accessible features will receive preference for such units over families who do not require such features. The application folder will be red to indicate the applicant's preference in processing.
- b. Units designated for the disabled⁶ (24 CFR §§ 945.105, 945.201, 945.203, 945.205, and 945.303) — in accordance with the 1992 Housing Act, disabled families with a head, spouse or sole member who qualifies as a person with disabilities as defined in 24 CFR § 945.105 will receive a preference for admission to units that are covered by a HUD-approved Allocation Plan. The application folder will be blue to indicate the applicant's preference in processing.
- i. Units with accessible features — Families with members who require a unit with accessible features will receive preference for such units over families who do not require such features.
- c. Mixed population units⁷ (24 CFR §§ 945.105 and 960.401, 960.403, 960.405, 960.407 and 24 CFR § 945.407) — in accordance with the 1992 Housing Act elderly families whose head, spouse or sole member is at least 62 years of age and disabled families, a family whose head, spouse, or sole member is a person with disabilities, will receive equal preference for admission to such units. No limit will be established on the number of elderly or disabled families that may occupy a mixed population property.

⁶ Buildings can also be designated for disabled families, also by following the requirements of the 1992 Housing Act. This entails preparing an allocation plan noting which buildings (if any) will be set aside for the disabled and preparing a supportive services plan. HUD approval is required for both the allocation and the supportive services plans.

⁷ A mixed population project is a property (or portion of a property) that was: reserved for elderly and disabled families at its inception and has retained that character; or the PHA obtained HUD approval to give preference in tenant selection to elderly and disabled families. See 24 CFR § 960.405. These projects were formerly known as elderly projects.

- i. Local preferences will be applied when selecting applicants for admission to this type of property.
 - ii. Elderly families or disabled families without a local preference can be given a preference for admission over non-elderly and non-disabled families that do qualify for such preferences.[24 CFR § 960.407 (c)]
 - iii. Elderly or disabled applicants who are single persons will be given a preference for admission over single persons who are neither elderly nor disabled.
 - iv. Units with accessible features — Families with members who require a unit with accessible features will receive preference for such units over families who do not require such features and will be identified with a color representing the preference as described herein.
- d. Units with accessible features, in any property CMHA will give a preference to families that include a person with disabilities who can benefit from the features in the unit.

8. Administration of the Preferences

- a. CMHA requires that applicants certify to their qualification for a local preference at the time of initial application.
- b. At the time of initial application preferences will be verified in accordance with CMHA's Procedure on Verification. Verification of a preference must be adequate to satisfy all conditions
- c. At the time of initial application, CMHA will use a preference checklist or other form to obtain the family's certification that it qualifies for a local preference. If a preference is claimed CMHA will advise the family of the need to verify the claim. At the initial application interview the family will be advised to notify CMHA of any change that may affect their ability to qualify for a preference.
- d. Applicants that are otherwise eligible and are certified or verified as qualifying for a preference will be placed on the waiting list in the preference applicant pool.
- e. Families that do not qualify for a local preference at the time of application will be notified in writing and advised of their right to an informal meeting as described below. If otherwise qualified, the family's application will then be placed on the waiting list in a the appropriate non-preference category.
- f. Applicants that certify/verify a local preference at the time of initial application must be able to verify their preference status prior to the offer of a unit. Applicants that cannot verify current preference status

will lose their preference qualification and their standing on the waiting list.

- g. Families that lose their original local preference, but still qualify for another local preference, will be placed on the waiting list in accordance with their current preference status. Families that cannot qualify for any of the local preferences will be moved into a non-preference category, in a lower position on the waiting list based on date and time of application.

9. Qualifying for Preferences

The definitions of Involuntary Displacement, Substandard Housing, Paying More than 50% of Income for Rent, and Standard, Permanent Replacement Housing can be found in Section 9 of these policies. CMHA may enter into separate lease agreements for PH units with service providers or other appropriate agencies that will provide services and special assistance to these populations under the terms of the lease agreement. Such leasing agreements may not exceed 20% of available housing units at any time.

- a. Involuntarily displaced -- The applicant has been involuntarily displaced and is not living in standard, permanent replacement housing.

NOTE: Applicants may not qualify if they were a resident family and refused to comply with applicable program policies or procedures with respect to the occupancy of under occupied and overcrowded units; or failed to accept a transfer to another housing unit in accordance with a court decree or in accordance with the policies and procedures of a HUD-approved desegregation plan.

- b. Living in substandard housing -- Applicants must be homeless or living in substandard housing at the time of verification required by CMHA.
- c. Paying more than 50% of income for rent -- A family must be paying more than 50% of income for rent for at least 90 days at the time of the verification required by CMHA.

NOTE: An applicant may not qualify if he or she is paying more than 50% of income for rent because the applicant's housing assistance under any one of the following programs is terminated as a result of the applicant's failure to comply with program policies and procedures on the occupancy of under occupied and overcrowded units. Programs covered under this provision are: Section 8 programs or public and Indian housing programs under the United States Housing Act of 1937; Section 101 of the Housing and Urban Development Act of 1965; or rental assistance payments under section 236 (f) (2) of the National

Housing Act.

- d. Local preferences require verification as described earlier in these policies.
10. Required Verifications for the Local 504 Preference — Applicants will qualify for the Preferences to the extent that their status is verified in accordance with CMHA Procedure on Verification.
11. Notice and Opportunity for a Meeting [24 CFR § 960.211 (e)]
 - a. CMHA will provide a written notice of determination in those cases where an applicant does not meet the criteria for receiving a Local preference. This notice will contain: a brief statement of the reasons for the determination, and a statement that the applicant has the right to meet with CMHA's designee to review the determination.
 - b. If the applicant requests the meeting, CMHA will designate an officer or employee to conduct the meeting. This person(s) can be the person who made the initial determination, the person who reviewed the determination of his or her subordinate, or a combination of all applicable parties involved in the determination. A written summary of this meeting will be made and retained in the applicant's file.
 - c. The applicant will be advised that he or she may exercise other rights if the applicant believes that illegal discrimination, based on race, color, religion, national origin, age, disability, or familial status has contributed to the CMHA's decision to deny the preference.

H. Applicant Selection Criteria

It is CMHA's policy that all applicants should be screened in accordance with HUD's regulations (24 CFR Part 960) and sound management practices. During screening CMHA will require applicants to demonstrate ability to comply with essential provisions of the lease as summarized below.

1. All applicants must demonstrate through an assessment of current and past behavior the ability:
 - a. to pay rent and other charges as required by the lease in a timely manner;
 - b. to care for and avoid damaging the unit and common areas;
 - c. to use facilities and equipment in a reasonable way;
 - d. to create no health, or safety hazards, and to report maintenance needs;
 - e. not to interfere with the rights and peaceful enjoyment of others, and to avoid damaging the property of others;
 - f. not to engage in criminal activity that threatens the health, safety or right

- to peaceful enjoyment of other residents or staff; and not to engage in drug-related criminal activity on or near CMHA premises;
 - g. to comply with necessary and reasonable rules and program requirements of HUD and the HA; and,
 - h. to comply with health and safety codes.
2. How CMHA will check ability to comply with essential lease requirements:
- a. Applicant ability and willingness to comply with the essential lease requirements will be checked and documented. Information to be considered in completing applicant screening will be reasonably related to assessing the conduct of the applicant and other family members listed on the application, in present and prior housing.
 - b. The history of applicant conduct and behavior must demonstrate that the applicant family can reasonably be expected not to:
 - i. Interfere with other residents in such a manner as to diminish their peaceful enjoyment of the premises by adversely affecting their health, safety, or welfare; [24 CFR § 960.205 (b)]
 - ii. Adversely affect the physical environment or financial stability of the project; [24 CFR § 960.205 (b)]
 - iii. Violate the terms and conditions of the lease; [24 CFR § 8.3 Definition: Qualified individual with disabilities]
 - iv. Require services from CMHA staff that would alter the fundamental nature of CMHA’s program. [24 CFR § 8.3 Definition: Qualified individual with disabilities)
 - c. CMHA will conduct a detailed interview of all applicants using an interview checklist. The checklist is part of the screening procedures used in support of this policy. The form will ask questions based on the essential elements of tenancy. Answers will be subject to third party verification. [24 CFR §960,,206 (a) &(b)]
 - d. CMHA will complete a rental history check on all applicants.
 - e. Payment of funds owed to CMHA is part of the screening evaluation. Payment of outstanding balances is an opportunity for the applicant to demonstrate an improved track record. CMHA will consider any past balances owed CMHA by the applicant for any program that CMHA operates. CMHA expects these balances to be paid in full (either in a lump sum or over time) before initiating the full screening process. CMHA will not admit families who owe back balances. (See § 960.205 (b)(1)
 - f. CMHA will complete a criminal background check on all applicants

including other adult members in the household or any member for whom criminal records are available. [24 CFR 960.205 (b)(3)]

- g. CMHA's examination of relevant information respecting past and current habits or practices will include, but is not limited to, an assessment of:
 - i. The applicant's past performance in meeting financial obligations, especially rent. [24 CFR § 960.205 (b) (1)]
 - ii. A record of disturbance of neighbors, destruction of property, or living or housekeeping habits at present or prior residences which may adversely affect the health, safety, or welfare of other tenants or neighbors. [24 CFR § 960.205 (b) (2)]
 - iii. Any history or record of criminal activity on the part of any applicant family member involving crimes of physical violence to persons or property and other criminal acts including drug-related criminal activity which would adversely affect the health, safety, or welfare of other residents or staff or cause damage to the unit or the development. (24 CFR § 960.205 (b) (3) and the Anti-Drug Act of 1988)
 - iv. A record of eviction from housing or involuntary termination from residential programs.
 - v. An applicant's ability and willingness to comply with the terms of CMHA's lease. (24 CFR § 8.2 Definition: Qualified Individual with Disabilities)
 - h. An applicant's intentional misrepresentation of any information related to eligibility, awards of preference for admission, housing history, allowances, family composition or rent will result in rejection. [24 CFR § 913.109 (b) & § 760.3]
 - i. Applicants must be able to demonstrate the ability and willingness to comply with the terms of CMHA's lease, either alone or with assistance which they can demonstrate that they have or will have at the time of admission. (24 CFR § 8.2 Definition: Qualified Individual with Disabilities) Availability of assistance is subject to verification by CMHA.
3. Screening applicants who claim mitigating circumstances
- a. If unfavorable information is received about an applicant, consideration will be given to the time, nature, and extent of the applicant's conduct and to factors that might indicate a reasonable probability of favorable future conduct. To be factored into CMHA's screening assessment of the applicant, mitigating circumstances must be verifiable. [24 CFR §960.205(d)]

- b. Mitigating circumstances⁸ are facts relating to the applicant's record of unsuitable rental history or behavior, which, when verified, would indicate both: (1) the reason for the unsuitable rental history and/or behavior; and (2) that the reason for the unsuitable rental history and behavior is no longer in effect or is under control, AND applicants' prospect for lease compliance is an acceptable one, justifying admission. Mitigating circumstances would overcome or outweigh information already gathered in the screening process.
- c. If the mitigating circumstances claimed by the applicant relate to a change in disability, medical condition or course of treatment, CMHA will have the right to refer such information to persons qualified to evaluate the evidence and verify the mitigating circumstance. CMHA will also have the right to request further information reasonably needed to verify the mitigating circumstance, even if such information is of a medically confidential nature. Such inquiries will be limited to the information necessary to verify the mitigating circumstances or, in the case of a person with disabilities, to verify a reasonable accommodation.
- d. Examples of mitigating circumstances might include: (24 CFR § 960.205 (d),
 - i. Evidence of successful rehabilitation;
 - ii. Evidence of the applicant family's participation in social service or other appropriate counseling service.
 - iii. Evidence of successful and sustained modification of previous disqualifying behavior.
- e. Consideration of mitigating circumstances does not guarantee that applicant will qualify for admission. CMHA will consider such circumstances in light of:
 - i. the applicant's ability to substantiate through verification the claim of mitigating circumstances and his/her prospects for improved future behavior; and
 - ii. the applicant's overall performance with respect to all the screening requirements; and,
 - iii. the nature and seriousness of any criminal activity, especially drug related criminal activity that appears in the applicant's record.

4. Qualified and Unqualified Applicants

⁸ The discussion of mitigating circumstance in this paragraph is applicable to all applicants. PHA is required by regulation to consider mitigating circumstance, see 24 CFR § 960.205 (d) (1).

- a. Verified information will be analyzed and a determination made with respect to:
 - i. Eligibility of the applicant as a family; (See 24 CFR § 912.2)
 - ii. Eligibility of the applicant with respect to income limits for admission; (See 24 CFR § 913.104 & 105)
 - iii. Eligibility of the applicant with respect to citizenship or eligible immigration status; [24 CFR § 912.4(b)]
 - iv. Unit size required for the family;
 - v. Preference category (if any) to which the family is entitled; (24 CFR § 960.211)
 - vi. Qualification of the applicant with respect to the Applicant Selection Criteria. (24 CFR § 960.205)
- b. Families determined to be qualified will be notified by CMHA of the approximate date of occupancy insofar as that date can be reasonably determined. [24 CFR § 960.207 (b)]
- c. Assistance to a family may not be delayed, denied or terminated on the basis of the family's ineligible immigration status unless and until the family completes all the verification and appeals processes to which they are entitled under both INS and CMHA procedures. [24 CFR § 912.9]
- d. CMHA will make every effort to accurately estimate an approximate date of occupancy. However, the date given by CMHA does not mean that applicants should expect to be housed by that date. The availability of a suitable unit to offer a family is contingent upon factors not directly controlled by CMHA, such as turnover rates, and market demands as they affect bedroom sizes and project location. [24 CFR § 960.207 (b)]
- e. Applicants determined unqualified for admission will be promptly notified. These applicants will receive a Notice of Rejection from CMHA, stating the basis for such determination. CMHA will provide such applicants with an opportunity for Informal Review and Grievance of the determination as described in the Resident Grievance Procedure (XII.G. Resident Grievance Procedure). [24 CFR § 960.207(a)]

I. Occupancy Guidelines

1. It is CMHA's policy that units should be occupied by families of the appropriate size. This policy maintains the usefulness of the units, while preserving them from excessive wear and tear or underutilization.

- a The following general unit maximum and minimum number of persons per unit will govern the assignment of a family of a given size and composition. These are only guidelines and the maximums may be exceeded at the request of the family, or because of the square footage of a specific unit:

Occupancy Guidelines Chart

Number of Bedrooms	Min Persons/Unit	Max Persons/Unit
0BR	1	1
1BR	1	2
2BR	2	4
3BR	3	6
4BR	4	8
5BR	5	10
6BR	6	12

- b. Exceptions to the maximum standards may be made in case of reasonable accommodations for a person with disabilities, emergencies, and at the discretion of the Executive Director or designee. Further, CMHA has the right to permit families exceeding the maximums shown above to occupy units when the family requests such occupancy, and when CMHA determines that the unit in question is large enough.
2. Families may choose to be placed on the waiting list for a unit one bedroom size smaller than that designated on the chart. A family that chooses to occupy a smaller size unit must agree not to request a transfer until their family size changes.
 3. Families will not be placed on the waiting list for a larger unit unless there is a verifiable medical reason or reasonable accommodation that requires that the family be placed in a larger size unit.
 4. An unborn child will **not** be counted as a person in determining unit size. A single pregnant woman may be assigned to a one bedroom unit. In assigning a unit CMHA will also consider a child who is temporarily away from the home

because of placement in foster care or kinship care.

V. TENANT SELECTION AND ASSIGNMENT PLAN

A. Organization of the Waiting List

It is CMHA's policy that each applicant will be assigned his/her appropriate place on a single citywide waiting list in sequence based upon date and time the application is received, suitable type or size of unit, and factors affecting preference or priority. Preference and priority factors are established in this policy in accordance with HUD regulations (24 CFR §§ 912.3, 945.303, 960.211, and 960.401) and are consistent with the objectives of Titles VI of the Civil Rights Act of 1964 and Title VIII of the Civil Rights Act of 1968 and the HUD regulations and requirements pursuant thereto. [24 CFR §§ 1.4 (b) (2) (ii) and 100] Exceptions to single citywide waiting lists will be permitted only when approved in advance by the Assistant Secretary for Fair Housing and Equal Opportunity.

B. Method of Applicant Selection

1. CMHA will first match the characteristics of the applicant to the unit available, including any priorities for admission required for designated or mixed population housing. Applicable Local preferences as described earlier in this policy will then be used to determine the order of selection from the waiting list. [24 CFR §§ 945.303 and 960.407] Further, in the selection of a family for a unit with accessible features CMHA will give preference to families that include a person with disabilities who can benefit from the unit features. [24 CFR § 8.27]
2. The plan for selection of applicants and assignment of dwelling units to assure equal opportunity and nondiscrimination on grounds of race, color, sex, religion, or national origin is PLAN "A". Under this plan each qualified applicant first in sequence on the waiting list is made one offer of a unit of appropriate size. The applicant must accept the vacancy offered or be dropped from the qualified applicant list, losing any applicable Local preferences.
3. The applicant must accept the vacancy offered within 3 working days of the date the offer is communicated (by phone, mail, or the method of communication designated by the applicant) or, be dropped from the qualified applicant list. Offers made over the phone will be confirmed by letter to the applicant. If unable to contact an applicant by phone CMHA will send a registered letter, return receipt requested.
4. "Dropped from the list" will mean the applicant will lose standing by being removed from the waiting list. Once dropped from the list applicants must wait for 9 months before reapplying to the public housing program.

5. If more than one unit of the appropriate size and type is available, the first unit to be offered will be the unit that was ready for occupancy first.
6. If an applicant is willing to accept the unit offered but is unable to move at the time of the offer and presents to the satisfaction of CMHA clear evidence (“good cause”) that acceptance of the offer of a suitable vacancy will result in undue hardship or disability not related to considerations of race, color, sex, religion or national origin, the applicant will not be dropped from the list. [24 CFR § 1.4 (b)(2)(ii) & (iii)]
7. Examples of good cause reasons for the refusal of an offer of housing include, but are not limited to:
 - a. Inaccessibility to a source of employment or children’s day care such that an adult household member must quit a job, drop out of an educational institution or job training program;
 - b. Presence of lead paint in the unit offered when the applicant has children under the age specified by current law;
 - c. The family demonstrates to CMHA’s satisfaction that accepting the offer will result in a situation where a family member’s life, health or safety will be placed in jeopardy. The family must offer specific and compelling documentation such as restraining orders, other court orders, or risk assessments related to witness protection from a law enforcement agency. Reasons offered must be specific to the family. Refusals due to location alone are not good cause.
 - d. A health professional verifies temporary hospitalization or recovery from illness of the principal household member, other household members or live-in aide (each as listed on final application) necessary to the care of the principal household member;
 - e. The unit is inappropriate for the applicant’s disabilities.
 - f. An elderly or disabled family makes the decision not to occupy or accept occupancy in designated housing. [24 CFR § 945.303 (d)]
8. The applicant must be able to document that the hardship claimed is good cause for refusing an offer of housing. Where good cause is verified to CMHA’s satisfaction, the refusal of the offer will not require that the applicant be dropped from the waiting list or otherwise affect the family’s position on the waiting list. [24 CFR § 85.42]
9. CMHA will maintain a record of units offered, including location, date, and circumstances of each offer, and each acceptance or rejection, including the reason for the rejection.

C. Occupancy of Dwelling Units with accessible or adaptable features [24 CFR § 8.27 (a) (1) (2) and (b)]

1. Before offering a vacant, accessible unit to a non-disabled applicant, CMHA will offer such units:
 - a. First, to a current occupant of another unit of the same development, or other public housing developments under CMHA's control, having a disability that requires the special features of the vacant unit (in effect, a transfer of the occupant with disabilities from a non-adapted unit to the vacant accessible/adapted unit if requested).
 - b. Second, to an eligible-qualified applicant on the waiting list having a disability that requires the special features of the vacant unit.
2. When offering an accessible/adaptable unit to a non-disabled applicant, CMHA will require the applicant to agree to move to an available non-accessible unit within 30-days when either a current resident or an applicant needs the features of the unit. This requirement will be reflected in the lease agreement signed with the applicant.

D. Leasing and Occupancy of Dwelling Units

It is CMHA's policy that all units must be occupied pursuant to a lease that complies with HUD's regulations (24 CFR Part 966).

1. Applicant folders will be processed centrally. Initial intake, waiting list management, screening, and offers of housing (including transfers) will be made at central office.
2. When offering units CMHA will provide the applicant with a brief property description and other information to help orient the applicant to the neighborhood and location in the property. The manager of the property will be advised of the offer and will contact the applicant to set up a date to show the unit.
3. Once the unit is shown and the applicant accepts the unit, the manager will execute a lease. If the applicant refuses the unit, the reason for refusal must be obtained in writing from the applicant. The applicant must sign the refusal form. The form is then sent to central office for a "good cause" determination. No applicant will be expected to sign a lease for a unit that is not ready for occupancy. § 966,4 (i))
4. Managers will show and lease units. If an exception to CMHA's occupancy standards is approved for the applicant this information will be noted on the leasing packet sent to the manager.
5. Changes in family composition, income, or status between the time of the interview with the applicant and the showing of the unit, or between annual

reexaminations will be processed centrally. Managers will work with central office to forward necessary information and coordinate this activity with the applicant or resident family.

6. The lease will be signed by the head, spouse, and all other adult members of the household accepted as a resident family and by the Executive Director or other authorized representative of CMHA, prior to actual admission. [24 CFR § 966.4 (p)]
7. If a resident transfers from one CMHA unit to another, a new lease will be executed for the dwelling into which the family moves. [24 CFR § 966.4 (c)(3)]
8. If at any time during the life of the lease agreement, a change in the resident's status results in the need for changing or amending any provision of the lease, either:
 - a. A new lease agreement will be executed, or
 - b. A Notice of Rent Adjustment will be executed, or
 - c. An appropriate rider will be prepared and made a part of the existing lease, or appropriate insertions made within the lease. All copies of such riders or insertions are to be dated and signed by the Resident and by the Executive Director or other authorized representative of CMHA. [24 CFR § 966.4 (o)]
9. Only those persons listed on the most recent certification form will be permitted to occupy a dwelling unit. [24 CFR §§ 960.209 (b) and 966.4 9 (a) (2)] Except for natural births to family members, any family seeking to add a new member must request approval in writing prior to the new member occupying the unit. [24 CFR § 966.4 (f)(3) & (c)(2)}
10. Additions to the household — Following receipt of a family's request for approval, CMHA will conduct a pre-admission screening of the proposed new member. Only new members approved by CMHA following the screening process will be added to the household. The results of screening will be used to determine whether or not to admit the new member. Children born to a family member, children under the age below which Juvenile Justice records are not made available who are adopted by a family member or who are added through a kinship care arrangement are exempt from the pre-admission screening process. The exemption age specified in this paragraph is subject to change should the State or locality modify its laws concerning the availability of police or court records for juvenile offenders.
11. Examples of situations where the addition of a family member is subject to screening are:

- a. Resident plans to be married and files a request to add the new spouse to the lease;
 - b. Resident is awarded custody of a child over the age for which juvenile justice records are available;
 - c. Resident desires to add a new family member to the lease, employs a live-in aide, or take in a fostered child(ren).
 - d. A unit is occupied by a remaining family member(s) under age 18 (and not an emancipated minor) and an adult, not a part of the original household, requests permission to take over as the head of the household.
12. Residents who fail to notify CMHA of additions to the household are in violation of the lease. Residents who permit persons to join the household without undergoing screening are also in violation of the lease. Such persons will be considered unauthorized occupants by CMHA and the entire household will be subject to eviction. [24 CFR § 966.4 (f)(3)]
 13. Family members over age 18 who move from the dwelling unit to establish new households will be removed from the lease. [24 CFR § 966.4 (f)(3)] The resident has the responsibility to report the move-out within 30 calendar days of its occurrence. These individuals may not be readmitted to the unit and must apply as a new applicant household for placement on the waiting list (subject to applicable income limits, preferences, resident selection, and screening requirements). Medical hardship, or other extenuating circumstances will be considered by CMHA in making determinations under this paragraph.
 14. Visitors may be permitted in a dwelling unit, provided they are reported to the Manager within 72 hours of their arrival or prior thereto. Visits not exceeding 30 calendar days in one year may be authorized by the manager. Visits of more than 30 calendar days will not be authorized. Visitors remaining beyond this period will be considered trespassers and the head of the household will be guilty of a breach of the lease.
 15. In accordance with the lease, roomers and lodgers will not be permitted to occupy a dwelling unit, nor will they be permitted to move in with any family occupying a dwelling unit. Subletting the unit is not permissible. Violation of this provision is ground for termination of the lease. [24 CFR § 966.4 (f) (2)]
 16. A resident will not be given permission to allow a former resident of CMHA who has been evicted to occupy the unit for any period of time. Violation of this requirement is ground for termination of the lease.

E. Pet Ownership - effective 1/1/00

1. Animals that assist the handicapped are excluded from the height provision of this addendum as well as the non-refundable fee provision.
 - a. If any rule or provision of the Pet Addendum is violated by residents or resident's guest or occupants, residents shall immediately and permanently remove the pet from the premises upon written notice from management or their representative, and management shall have all other rights and remedies set forth in the standard lease agreement including damages, eviction and/ or attorney fees.
 - b. The HA shall have the right to make reasonable changes and/ or additions to these rules and will notify residents in writing of any said changes.
2. Only one dog or cat is permitted per unit. Only common, household pets will be permitted such as dogs, cats, birds, turtles and fish. No exotic animals, mammals, reptiles rodents, or insects are allowed. Each adult resident who is signed on the lease shall also sign the Pet Ownership Lease.
 - a. A statement is required from a veterinarian that the animal has been spayed or neutered prior to occupancy in the unit, and proof that all required vaccinations have been administered as required by law is required to be given to the manager prior to the animal's occupancy of the unit. Owners must maintain current inoculations of pets as defined by the Columbus Health Department and such records are to be made available upon request of management.
 - i. The resident must provide proof of licensing annually, which is payable to Franklin County by January 20th of each year. Failure to provide this information to the HA is considered a Lease violation and may result in eviction.
 - b. Animals must be kept on a leash when outside their unit and under control of their handler. Pets are not permitted to be tied to any fixed object outside of the unit and are not permitted in common areas or any posted areas shared by other residents.
 - c. It is the resident's responsibility to clean up and properly dispose of animal waste immediately. Pets are to be fed and watered inside the resident's unit; no food or water is allowed to be stored outside of the unit or in common areas.
 - d. Excessive barking, whining or howling is considered to be a violation of the Lease provision regarding peaceful enjoyment. Pets must be secured (ie. caged or placed in a room) when the resident is not at

home or when a CMHA employee enters the unit for any reason. Animals may be removed permanently and immediately if complaints from neighbors or other residents or if the pet has disturbed the rights, comforts or conveniences of neighbors or other residents.

2. There will be a one time, non-refundable fee of \$300 per dog and \$200 per cat assessed as a general fee for any dog or cat and all pet related purposes which is payable to the HA. This fee is not a limit on the resident's liability for property damage, cleaning, deodorization, defleaing, replacements and/ or personal injuries.
 - a. Guests are not permitted to bring pets into resident's units. Residents are not permitted to "house sit" any pets belonging to others for any reason.
 - i. Residents must inform the HA who will be responsible for the care of their pet in the event they become ill for an extended period of time or in the event of their death or any emergency situation.
 - b. The resident must advise the Manager in writing of their desire to own a pet. Permission to keep a pet is conditional during the term of residency, provided that all rules and regulations are adhered to, whether they are CMHA rules and regulations or applicable laws or ordinances.
 - c. Residents shall be jointly and severally liable for damages and all other obligations set forth herein, even if such resident does not own the pet.
 - i. Each resident shall pay for cleaning, defleaing, and deoderizing their unit as directed by the Manager and/ or prior to move out, and this service will be secured by Management and paid by the resident prior to any refund of housing deposit.
3. Animals must not exceed 35 pounds at maturity. Pit Bull Terriers, or any animal used for fighting purposes or any animals deemed vicious, dangerous or a nuisance by law or ordinance are forbidden (Columbus City Health Code, Chapter 243, Vicious, Dangerous and Nuisance Animals and ORC Section 955.11).

F. Resident Transfers (Administrative Transfer Ratio, Transfer Requirements)

1. It is CMHA's policy that transfers will be made without regard to race, sex, sexual orientation, color, religion, national origin, or familial status. Residents can be transferred to accommodate a disability. (Required, 24 CFR § 100.5)
2. Residents will not be transferred to a dwelling unit of equal size within a site or

between sites except to alleviate hardship of the resident or other undesirable conditions as determined by the Executive Director or designee.

3. CMHA has four types of transfers: Emergency, Administrative - Category 1, Administrative - Category 2, and Incentive.
4. Resident Transfer Criteria:
 - a. Emergency Transfers are permitted when the unit or building conditions pose an immediate threat to resident life, health or safety, as determined by CMHA. Emergency transfers within sites or between sites may be made to repair unit defects hazardous to life, health, or safety, alleviate verified medical problems of a life threatening nature.
 - b. Administrative transfers - Category 1: includes transfers to remove residents to alleviate verified medical problems of a serious nature, permit modernization of units, or permit a family that requires a unit with accessible features to occupy such a unit.
 - i. Requests for medical transfers under Category 1 will be made to the manager. The Resident will provide the manager with the necessary verification and/or documentation to substantiate the need for a medical transfer. Whenever feasible, transfers will be made within a resident's area (e.g., moving a person with mobility problems to a unit with accessible features).
 - c. Administrative transfers - Category 2: within sites or between sites may be made to correct occupancy standards (over/under housed conditions). These transfers will not take priority over new admissions.
 - d. Category 2 administrative transfers will be processed with new admissions. The ratio is discretionary and will be reviewed at least annually to determine its effects on vacancy. Based on recommendations from staff, the Executive Director may authorize a change in the ratio or suspend the processing of this type of transfer.
 - i. Transfers to correct occupancy standards may be recommended at time of reexamination or interim redetermination. This is the only method used to determine over/under housed status.
 - ii. Residents in an over/under housed status will be advised in their 30-day "Notice of Result of Reexamination" that a transfer is recommended and that the family has been placed on the transfer list. Interviewers will record transfer recommendations in duplicate for each manager affected by the transfer.
 - iii. Split-family transfers will be processed under this category of administrative transfers. Families that split into 2 "new"

households may be transferred to two different units or a portion of the “old” household may be transferred to a single unit depending on family circumstances and unit availability. Options for split-family transfers will be considered in order to minimize the impact on vacant units. Such transfers will be made in a manner that best benefits CMHA.

- e. A good record is required for a transfer — residents will be considered for transfers if they:
 - i. have not engaged in criminal activity that threatens the health and safety of residents and staff;
 - ii. do not owe back rent or other charges, or evidence a pattern of late payment; or
 - iii. meet reasonable housekeeping standards and have no housekeeping lease violations.
- f. Without a determination of exception the following policy applies to transfers:
 - i. If back rent is owed the resident will not be transferred until back rent is paid in full.
 - ii. A resident with housekeeping standards violations will not be transferred until he or she passes a follow-up housekeeping inspection.
- g. Incentive Transfers - CMHA may elect to occupy recently modernized and scattered site units through incentive transfers. No applicants will be admitted directly to scattered site units. Depending on CMHA’s vacant unit status, modernized units will be filled with incentive transfers, new applicants, or a combination of both. CMHA reserves the right to fill modernization units in a manner that has the least impact on vacant units.
- h. Resident requests for incentive transfers should be made to the Housing Manager. Managers may also recommend a resident for an incentive transfer. In order for a resident to be considered for an incentive transfer the following conditions must be met:
 - i. Residency in a CMHA development for a least five (5) years.
 - ii. No repayment agreement or unpaid balance at any time in the past two (2) years.
 - iii. No history of disturbances that resulted in lease violations or violence toward staff or neighbors as indicated by notices of lease violation in the applicant’s file.
 - iv. A good housekeeping record.
 - v. Cost of transfers - Residents will bear the cost of transfers to

correct occupancy standards, however, where there is a hardship due to health, disability, or other factors, the manager may recommend that families be reimbursed their out-of-pocket expenses for an occupancy standard transfer. Transfers requested or required by CMHA will be paid for by HA.

- vi. The Manager has the responsibility to obtain and document all pertinent information relative to a request for transfer.

5. Resident Transfers, Administrative Requirements

- a. Transfers will be processed at a central location in accordance with CMHA Procedure on transfers. A central transfer list will be maintained.
- b. Regional managers will review all transfer requests and forward the request to central office. At central office transfers must be approved by the Executive Director or designee.
- c. Residents will receive one offer of a transfer. Refusal of that offer without good cause will result in the removal of the household from the transfer list. The good cause standards applicable to new admissions will apply to transfers.

VI. ELIGIBILITY FOR CONTINUED OCCUPANCY, ANNUAL RE-EXAMINATIONS, AND REMAINING FAMILY MEMBERS

A. Eligibility for Continued Occupancy

Residents who meet the following criteria will be eligible for continued occupancy:

- 1. Qualify as a family as defined in this policy. (Note: For the purpose of continued occupancy remaining family members qualify as family. Remaining family members can also include court ordered emancipated minors under the age of 18.)
- 2. Are in full compliance with the resident obligations and responsibilities as described in the dwelling lease.
- 3. Whose family members each have Social Security numbers or have certifications on file indicating they have no Social Security number.
- 4. Who are citizens or have eligible immigration status. Every member of a resident family must submit either evidence of citizenship or eligible immigration status as required by 24 CFR § 912.6.

B. Remaining Family Members and Prior Debt

- 1. As a party to the lease, remaining family members (other than the head or

spouse) 18 years of age or older will be responsible for arrearage incurred by the former head or spouse. CMHA will not hold remaining family members (other than the head or spouse) responsible for any portion of the arrearage incurred prior to the remaining member attaining age 18.

2. Remaining family members under age 18 will not be held responsible for the rent arrearage incurred by the former head of household.

C. Periodic Reexamination.

1. Regular reexamination. CMHA will, at least once a year, reexamine the anticipated incomes of all resident families. [24 CFR § 960.209 (a)]
2. Special Reexamination. When it is not possible to estimate projected family income with any degree of accuracy at the time of admission or regular reexamination, a temporary determination will be made with respect to income and a special reexamination will be scheduled every 90 days until a reasonably accurate estimate of income can be made. The resident will be notified in advance as to the date for the special reexamination(s).
3. Persons reporting zero income will have their circumstances examined every 60 days until they have a stable income. Persons claiming zero income will also be asked to verify how they are meeting their living expenses.
4. Reexamination Procedures
 - a. At the time of reexamination, all adult members of the household will be required to sign forms required by HUD.
 - b. Employment, income, allowances, Social Security numbers, and such other data as are deemed necessary will be verified via third party, and all verified findings will be documented and filed in the resident's folder. [24 CFR § 960.206]
 - c. Verified information will be analyzed and a determination made with respect to:
 - i. Eligibility of the resident as a family or as the remaining member of a family:
 - ii. Unit size required for the family;
 - iii. Rent the family should pay.
 - d. Income will be computed in accordance with the definitions and procedures set forth in this policy. [24 CFR § 913]
 - e. Families failing to respond to the initial reexamination appointment will be issued a final appointment within the same month. Failure to respond to the final request will result in the family being sent a notice of lease violation and referred to the Housing Manager for failure to comply with

the terms and conditions of occupancy required by the lease. Failure to comply will result in termination of the lease. [24 CFR § 966.4 (c)(2)]

5. Action Following Reexamination

- a. If there is any change in rent, the lease will be amended, or a new lease will be executed, or a Notice of Rent Adjustment will be issued. [24 CFR § 966.4 (c) & (o)]
- b. If any change in the unit size is required, the resident will be place on a transfer list in accordance with the transfer criteria described earlier in this policy and moved to an appropriate unit when one becomes available. [24 CFR § 966.4 (c)(3)]
- c. CMHA will not commence eviction proceedings, or refuse to renew a lease, based upon the income of the resident family unless (1) it has identified, for possible rental by the family, a unit of decent, safe and sanitary housing of suitable size available at a rent not exceeding thirty percent (30%) of income as defined by the Authority for the purpose of determining rents; or (2) it is required to do so by local law. Pending their removal from the project, such families are to be charged rents calculated in accordance with the formula for Total Tenant Payment described in Section VIII of these policies. [24 CFR § 960.210]

VII. INTERIM RENT ADJUSTMENTS: FIXED RENT SYSTEM

A. Rent Adjustments

- 1. Residents must report all changes in family composition or status to the housing manager within 10 calendar days of the occurrence. Failure to report within the 10 calendar days may result in a retroactive rent charge.
- 2. Not all changes in family income between reexaminations will result in a rent change. CMHA will process interim changes in rent in accordance with the chart below⁹:

INCOME CHANGE	HA ACTION
a. Decrease in income for any reason, except for decrease that lasts less than 30 days. [24 CFR § 913.107]	HA will process an interim adjustment in rent. An interim adjustment will not be processed if the decrease will last less than 30 days or Public Assistance was

⁹ This is the so-called “Fixed Rent System”. HAs may elect to increase resident rent at an Interim Readjustment due to any increase in income (the “Interim Rent System” or for selected increases in income stated in the lease.

	terminated due to fraud or non-compliance with Program Rules.
b. Increase in earned income from the employment of a current household member.	HA will defer the increase to the next regular reexamination unless income increases due to the end of exclusion period being met.
c. Increase in unearned income.	HA will defer the increase to the next regular reexamination unless income increased due to the end of an income exclusion period being met.
d. Increase in income because a person with income (from any source) joins the household.	HA will defer the increase to the next regular reexamination.

- e. Residents that take work to obtain the deferral of income and have a pattern of employment termination without good cause to avoid being employed at the next regular reexamination will be considered as misrepresenting the facts and subject to retroactive increases as described in ¶ C. below. Residents with seasonal or part-time employment of a cyclical nature will be asked for third party documentation of the circumstances of their employment including start and ending dates.
 - f. CMHA will process an interim adjustment in rent if it is found that the resident at an annual or interim reexamination has misrepresented the facts upon which the rent is based so that the rent the Resident is paying is less than the rent that he or she should have been charged. CMHA will apply any increase in rent retroactive to the first of the month following the month in which the misrepresentation occurred.
3. Complete justification and verification of the circumstances applicable to rent adjustments must be documented by the resident and verified and approved by the Executive Director or his/her designee. [24 CFR § 960.206]
 4. CMHA will process interim adjustments in rent in accordance with the following policy:
 - a. When a decrease in income is reported, and the Authority receives confirmation that the decrease will last less than 30-days, an interim adjustment will not be processed.
 - b. Residents reporting decreases in income that are expected to last more than 30 days will have an interim adjustment processed.
 5. Residents granted a reduction in rent under these provisions may be required to report for special reexamination at intervals determined by the Housing

Manager. Reporting is required until the circumstances cease or until it is time for the next regularly scheduled reexamination, whichever occurs first. If family income increases during this time, the rent will be increased accordingly. A fully documented record of the circumstances and decisions will be included in the resident's folder.

B. Effective Date of Adjustments

Residents will be notified in writing of any rent adjustment and such notice will state the effective date of the adjustment.

1. Rent decreases go into effect the first of the month following the reported change, provided the change in income or circumstances was reported within the month in which it occurred.
2. Rent increases (except those due to misrepresentation) require 30 days notice.

C. Failure to Report Accurate Information

If it is found the resident has misrepresented or failed to report to Management the facts upon which his/her rent is based so that the rent being paid is less than what should have been charged, then the increase in rent will be made retroactive. Failure to report accurate information is also grounds for initiating eviction proceedings in accordance with CMHA's dwelling lease. [24 CFR § 966.4 (c)(2)]

D. Exceptions to Minimum Rent - SPECIAL FINANCIAL HARDSHIP REVIEW

The PHA may establish minimum rents of up to \$50. The minimum rent is applied as the Total Tenant Payment (TTP), but the resident of the PHA unit may be entitled to a utility reimbursement in the event that the reimbursement is more than the TTP. Certain exceptions to Minimum Rent have been established in accordance with the QHWRA sec.507. Exceptions are considered due to "financial hardship" circumstances that would prevent a PHA resident from being able to pay the HA minimum rent on a long-term basis:

1. The family has lost eligibility for or is pending eligibility for a Federal, State, or Locally funded Training and/ or Assistance Program. These Programs must be verified as receiving Federal, State, or Local Government funds to be considered eligible programs. [QHWRA § 507.1]
2. The family may be evicted as a result of the imposition of the \$50 minimum rent requirement.
3. The income of the PHA resident family¹ has decreased due to a change in

¹ Definition of Family - Two or more persons (with or without children) regularly living together, related by blood, marriage, adoption, guardianship or operation of law who will live together in HA housing; OR two or more persons who are not so related, but are

circumstance as it relates to family composition or loss of income.

- a. Income decreased or terminated due to the PHA resident household's failure to comply with an economic self-sufficiency program or work activities requirements will not be permitted to claim an exception to minimum rent or qualify for an interim rent review and/or adjustment.
 - b. Income decreased or terminated due to the PHA resident household's reported as having submitted fraudulent information to a Federal, State, or Locally funded Assistance Agency a will not be permitted to claim an exception to minimum rent or qualify for an interim rent review and/or adjustment.
 - c. If the PHA family's Assistance Program has been terminated due to "life-term" being reached an exception to minimum rent may be applicable.
4. A death in the PHA unit family has occurred.
 5. Other circumstances determined by the responsible entity.
 6. Hardships determined to be temporary will not be eligible for the exception to minimum rent.
 - a. During the 90-day period following PHA resident household's request for a hardship the unit's residents must demonstrate that the financial hardship is of a long-term basis. Minimum Rent will be temporarily suspended until such determination has been made.
 - i. If the financial hardship is determined to be of a long-term basis...
The HA will retroactively allow the exception to the date of the documented resident claim.
 - ii. If the financial hardship is determined to be temporary...
Minimum rent is charged including any retroactive charges for rent from the time of suspension. A reasonable Re-payment Agreement will be made at such time of determination and/ or CMHA may demand payment in full at such time determination of in-eligibility for the Exception to Minimum Rent has occurred.
 - iii. Proper verification of resident claims are required. -

regularly living together, can verify shared income or resources who will live together in HA housing.

The term family also includes: Elderly family , Near elderly family, disabled family, displaced person, single person, the remaining member of a tenant family, a foster care arrangement, or a kinship care arrangement (. Other persons, including members temporarily absent (e.g. a child temporarily placed in foster care or a student temporarily away at college), may be considered a part of the applicant family's household if they are living or will live regularly with the family. [24 CFR §§912 and 960]

Live-in Aides may also be considered part of the applicant family's household. However, live-in aides are not considered family members and have no rights of tenancy or continued occupancy.

The Federal, State, or Local Government must acknowledge and verify all claims for long-term financial hardship due to a disability. In addition to verification supporting the loss or decrease of income due to the disability.

- b. The PHA resident household may request a grievance hearing if they contest the determination that has been made in accordance with CMHA Grievance Procedure and is exempt from any escrow deposit as it relates to the minimum rent hardship request.

VIII. LEASE TERMINATION PROCEDURES

It is CMHA's policy that no resident's lease will be terminated except in compliance with applicable HUD regulations (24 CFR § 966.4 (1)(2) and the lease terms.

A. Notice Requirements

1. No resident will be given a Notice of Lease Termination (30 days notice) without being told by CMHA in writing the reason for the termination. The resident must also be informed of his/her right to request a hearing in accordance with the Grievance Procedure, and be given the opportunity to make such a reply as he or she may wish. Certain actions are excluded from the Grievance Procedure, specifically: any criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises of other residents or CMHA employees; and any drug-related criminal activity on or near such premises. [24 CFR § 966.4 (1)(3)]
2. Notices of lease termination can be served personally, and if posted to the apartment door, will also be sent to the resident by Certified Mail. Return of the Certified Mail receipt, whether signed or unsigned will be considered to be proof that the resident received proper notification.

B. Record keeping Requirements

A written record of every termination and/or eviction will be maintained by CMHA, and will contain the following information:

1. Name of resident, number and identification of unit occupied;
2. Date of the Notice of Lease Termination and any other notices required by State or local law; these notices may be on the same form and will run concurrently;
3. Specific reason(s) for the Notices, with section of the lease violated, and other facts pertinent to the issuing of the Notices described in detail;
4. Date and method of notifying the resident;

IX. UTILITIES

In some of CMHA's developments residents pay the cost of certain utilities directly to the supplier of utilities. When this is the case, resident rents are reduced by an Allowance for Utilities that is developed by CMHA in consultation with the utility supplier and reviewed by HUD. [24 CFR § 965 & 966.4 (b)(2)]

A. Resident-Paid Utilities

The following requirements apply to residents living in developments with resident-paid utilities or applicants being admitted to such developments:

1. When the supplier of utilities offers a "Budget" or level payment plan, it will be suggested to the resident to pay his/her bills according to this plan. This protects the resident from large seasonal fluctuations in utility bills and ensures adequate heat in the winter.
2. Third-Party Notification — When a resident makes application for utility service in his/her own name, he or she must sign a third-party notification agreement so that CMHA will be notified if the resident fails to pay the utility bill.
3. Ability to Get Utilities Connected — If a resident or applicant is unable to get utilities connected because of a previous balance owed the utility company at a prior address, resident/applicant will not be permitted to move into a unit with resident paid utilities. This may mean that a current resident cannot transfer to a scattered site or that an applicant cannot be admitted to a unit with resident-paid utilities.
4. Payment Requirements-Resident Paid Utilities — Paying the utility bill is the resident's obligation under the Authority's lease. Failure to pay utilities is grounds for eviction.

B. Excess Utility Charges

Residents in units where the CMHA pays the utilities may be charged for excess utilities if additional appliances or equipment are used in the unit (e.g. window air conditioners). This charge will be applied as specified in the lease. [24 CFR § 966.4 (b)(2)]

X. CEILING RENTS [SEE PIH NOTICE # 92-8 AND FEDERAL REGISTER VOL. 54, NO. 49, 3/15/89, AND VOL. 56, NO 241, 12/16/91]

A. Intent and purpose

Ceiling rents are intended for families whose incomes have increased to the point that an income-based rent (Total Tenant Payment as established in 24 CFR 913.107) is unreasonable for the housing being provided.

B. Determining the need for Ceiling Rents

The need for ceiling rents will be demonstrated in two ways:

1. Resident families pay an income-based rent in an amount greater than the Section 8 Fair Market Rent (FMR) for a comparably sized unit; or,
 2. Resident families pay an income-based rent in an amount greater than comparable unassisted rental housing as determined by CMHA. (Comparable means of similar age, amenities, design, and size in the same market area.) **
- ** The second situation is applicable only when CMHA determines by survey that the Section 8 FMRs do not reflect the fair value of some or all PHA units.

C. Establishing Ceiling Rents

CMHA retains the option, with HUD approval, to establish ceiling rents for all dwelling units in a particular development, for one or more classes of units under management (e.g. all three bedroom units) or inventory wide. Ceiling rents for a class of units will be based on the unit type, size, location or some other characteristic that is unit-based. Classification of ceiling rents units will not be resident based, that is, applicable to particular families because of their personal circumstances, rather Ceiling Rents will be based on the characteristics of the dwelling units occupied.

CMHA retains the right to revoke or raise ceiling rents at any time after giving reasonable notice to the affected tenants.

D. Calculating Ceiling Rents

1. CMHA will follow the procedures established by HUD in the 15 March 1989 Federal Register. CMHA will determine the minimum ceiling rent that can be established for a unit.
2. Tenants will be charged the greater of:
 - a. the minimum ceiling rent as calculated by CMHA; or
 - b. the current Section 8 Fair Market Rent for a comparably sized existing housing; unless, CMHA has determined that the FMRs substantially exceed or understate the fair rental value of some or all CMHA's units.
 - c. In the event of an "inaccurate" FMR as described in (b) above, CMHA will charge the greater of: the minimum ceiling rent as calculated by CMHA or an amount equal to comparable unassisted rental housing in the area if approved by HUD.

E. What the resident pays

Tenants in units where ceiling rents are in effect will pay the lower of the ceiling rent as established in 7. D. above, or the income-based rent. (Total Tenant Payment, TTP, as established in 24 CFR 913.107.)

F. Ceiling Rent Adjustments

1. Ceiling rents will be adjusted to reflect the most recent Section 8 FMR as

published annually by HUD in the Federal Register.

2. The minimum ceiling rent as calculated by CMHA will be adjusted annually to reflect operating expenses as reported on the Statement of Operating Receipts and Expenditures as of the end of the most recent fiscal year.

XI. FLAT RENTS

- A. Flat rent will be 85% of Fair Market Rent (FMR) for Franklin County based on bedroom size minus community based utility cost for 1998 except for those communities that are master metered. In the master metered communities it will be a flat rent based on 85% of FMR.
- B. Annually a choice will be offered to residents to select 30% of adjusted gross income or flat rent pending HUD approval. The effective date will be that of the accepted 5 and 1 year Plan

XII. RESIDENT GRIEVANCES

A. Introduction

1. Purpose and Availability

- a. The purpose of this MANUAL is to set forth the requirements, standards, criteria and process for the HA's Grievance Procedure. The Grievance Procedure is a means through which a Resident of low-rent Public Housing may bring his or her grievance concerning his or her residency before the Authority and, if applicable, before a fair, impartial and disinterested Hearing Officer.

The Grievance Procedure ensures that the resident is afforded an appropriate forum to present his or her grievance when he or she disputes or challenges, within the time prescribed, any HA action or failure to act involving his or her residency or any policy, rule and/or regulation of the HA which allegedly adversely affects his rights, duties, welfare or status. {24 CFR § 966.50}

- b. Representation - The Grievance Procedure is designed to be an efficient, effective and accessible forum for the prompt resolution of a resident's grievance. In order for the Grievance Procedure to operate as designed, resident representation is preferred and encouraged at grievance hearings. The Columbus Legal Aid Society (hereinafter, "Legal Aid") is available to perform advocacy for residents and applicant at both informal and formal grievance hearings. Residents desiring to use the Grievance Procedure to resolve disputes with the

HA are strongly urged to contact Legal Aid by telephone at (614) 224-8374 or in person at 40 West Gay Street, Columbus, Ohio 43215.

- c. Availability - A copy of this MANUAL shall be available for public inspection at the Central Office, in the office of the Director of Housing Management and Services, the Applications Office and all Management Offices; and be furnished to Applicants, Residents, resident organizations, Legal Aid, the Columbus Urban League, the Columbus Branch of the NAACP, and any other person or community group upon request within a reasonable time and for a reasonable fee to cover the copying costs of the HA. {24 CFR § 966.52 (d)}

B. Applicability and Scope

In accordance with 24 CFR § 966.51, this Grievance Procedure shall be applicable to all individual grievances (as defined herein) with the HA with the following three exceptions:

1. Because HUD has issued a due process determination that the law of the State of Ohio requires that Tenant be given the opportunity for a hearing in court which provides the basic elements of due process (as defined hereinafter) before eviction from the dwelling unit, the Grievance Procedure shall not be applicable to any termination of tenancy or eviction that involves:
 - a. Any criminal activity that threatens the health, safety, or right to peaceful enjoyment of CMHA property of other residents or employees of CMHA, or
 - b. Any drug-related criminal activity on or near CMHA property.
2. CMHA's Grievance Procedure shall not be applicable to disputes between Residents not involving CMHA or to class grievances. The grievance procedure is not intended as a forum for initiating or negotiating policy changes between a group or groups of Residents and CMHA's Board of commissioners.
 - a. CMHA's Grievance Procedure shall not be applicable to disputes arising from CMHA's denial of an Applicant's request for a Local Preference (24 CFR § 960.211 (k)).
3. The Grievance Procedure, when appropriate, shall be applicable to, but not limited to the following:

- a. Disputes over the amount of rent due under the lease for the leased premises.
- b. Charges levied by the HA due to damages to the HA's property allegedly caused by the Resident or Resident household members, guests, invitees; and
- c. Conditions in the Resident's dwelling unit and/ or the need for repairs.

C. Construction of text and operation

Whenever the context of this MANUAL so requires:

- 1. Words and phrases shall be read in the context and construed according to the rules of grammar and common usage. Words and phrases that have acquired a technical or particular meaning shall be read and construed accordingly;
 - a. "And" may be read "or", and "or" may be read "and" if the sense so requires it; and
 - b. The singular includes the plural, and the plural includes the singular. Words of one gender include the other genders. Words in the present tense include the future tense. If there is a conflict between figures and words in expressing a number, the words shall govern. Any modification to this Grievance Procedure shall be prospective in operation and application unless otherwise expressly made retrospective.
 - i. If any provisions of a section of the Grievance Procedure or the application thereof to any person or circumstance is held invalid, the invalidity does not affect other provisions or effect without the invalid provision or application, and to this and the provisions are severable.
 - ii. Any reference to any portion of the Ohio Revised Code (RC) Or the Code of Federal Regulations (CFR) applies to all re-enactments or amendments thereof.
 - iii. This Grievance Procedure is incorporated by reference in all Resident Leases. Any changes proposed in this Grievance Procedure must provide for at least thirty (30) days notice to Residents and resident organizations, setting forth the proposed changes and providing an opportunity to present written comments. Comments submitted shall be considered by CMHA

before any revisions are made to the Grievance Procedure (24 CFR § 966.52 (d)).

D. Definitions

for purposes of this Grievance Procedure, the following definitions are applicable:

1. Applicant - anyone who make application to become a resident of CMHA or a participant in CMHA's Section 8 or Homeownership Programs.
2. Application - any written request from any person to CMHA to become a resident of CMHA or a participant in CMHA's Section 8 or Homeownership Programs.
3. Authority - CMHA
4. Authority Property - any real or personal property owned or managed by CMHA
5. Board of Commissioners or Commissioners - the duly appointed Commissioners of CMHA
6. Day or Days - a calendar day or calendar days, inclusive of Saturday, Sunday, and legal holidays.
7. Decision - the Hearing Officer's written findings and conclusions, and reasons therefore, relative to Resident's or Applicant's Grievance.
8. Determination - the decision of the CMHA Board of Commissioners made pursuant to 24 CFR § 955.57 (b).
9. Employee - any person employed by the Authority or any agent or representative of the Authority.
10. Eviction or Forcible Entry and Detainer Action - the Court ordered dispossession of a Resident from the leased premises as a result of a Court judgement granting restitution of the leased premises to CMHA.
11. Grievance - any dispute which a Resident may have with respect to Authority action or failure to act in accordance with the individual Resident's lease or Authority regulations which affect the individual Resident's rights, duties, welfare or status.
12. Grievance Hearing shall mean a session where an Applicant or a Resident and

the Authority present information concerning a Resident/Applicant grievance to an impartial Hearing Officer and based on the information presented and the applicable law, regulations and rules, a decision is rendered.

13. Hearing Officer - a person selected by CMHA in accordance with 24 CFR § 966.55 and this Grievance Procedure to hear Resident grievances and render a decision with respect thereto.
14. Housing Community Management Office - the on-site Authority Management Office for the Housing Community in which a Resident resides.
15. HUD - the Department of Housing and Urban Development.
16. Informal Settlement Conference - the conference held between the Housing Community Manager and the Resident to informally discuss and settle the Resident's grievance.
17. Lease or Dwelling Lease - the written contractual agreement between the Authority and the Resident that sets forth the rights, responsibility and obligations of each relating to the use and occupancy by Resident of property (including real and personal property) owned and/ or managed by CMHA.
18. Leased Premises - the unit, dwelling unit, apartment or property (including real and personal property) leased or rented to Resident pursuant to the lease with CMHA.
19. Resident Organization - an organization of residents, incorporated or unincorporated, who reside in CMHA owned or administered property.
20. Rule - regulations, codes of conduct and policies.
21. Resident - the adult person (or persons) other than a Live-In Aide: a) who resides in the unit, and who executed the lease with CMHA as lessee of the dwelling unit, or if no such person now resides in the unit, b) who resides in the unit, and who is the remaining head of the household of the Resident family residing in the dwelling unit.
22. Written or in Writing - any representation in words, letters, symbols, or figures.

E. Effective date

The policies and procedures set forth in this Manual shall take effect immediately and shall remain in effect until modified or repealed by the Board of Commissioners

of the Authority.

- F. Authority's affirmative duty to inform applicants and residents about the grievance procedure

The Authority has a affirmative duty to inform Applicants and Residents about this Grievance Procedure. This duty shall be complied with by:

1. Posting Form 1 (attached hereto) in a conspicuous place in each Housing Community Management Office, the Applications Office and the Authority Central Office; and
2. By advising each Applicant and Resident to read Form 1. Further, if a Resident has made several complaints about some problem but has not specifically requested an Informal Settlement Conference (hereinafter sometimes referred to as Conference), it is desirable, but not mandatory, that the Housing Community manager inform the Resident of the Grievance Procedure and the possibility of settlement under it.

- G. Grievance Procedures

1. Informal Settlement of Resident's Grievance
 - a. If the Resident chooses to resolve his/ her grievance through this Grievance Procedure, he shall personally present, either orally or in writing, his grievance to the Office of the Director of Housing Management and Services at CMHA's Central Office or to the Management Office of the Housing Community in which he resides so that the grievance may be discussed informally and possibly settled at an Informal Settlement Conference without a grievance hearing (24 CFR § 966.54).
 - b. Grievances received by the Office of the Director of Housing Management and Services at CMHA's Central Office will be referred to the Resident's Housing Community Manager.
 - c. The Resident shall present his grievance by 4:00 p.m. on or before the Seventh (7th) day from the date that the dispute or problem originally arose (except in the case where CMHA has issued a Proposed Termination of Lease or Homeownership Agreement). 24 CFR § 966.50.
 - i. When CMHA's Central Office or the Resident's Housing Community Management Office is closed to the public for the

entire day and such day is the seventh (7th) and final day for the Resident to present his grievance or before 4:00 p.m. of such day, then the Resident may present his grievance on the next succeeding day which is not a Saturday, Sunday or legal holiday recognized by the Authority.

- ii. If the Resident does not timely present his grievance, he shall not be entitled to an Informal Settlement Conference or Grievance Hearing under this Grievance Procedure unless he can show good cause for his failure to timely present the same. The Director of Housing Management and Services of the Authority or his designee shall determine whether the Resident has good cause for failing to timely present his grievance.
- d. If the Applicant chooses to dispute the reason for rejection of his/ her application, he shall personally present, either orally or in writing, his grievance to the Office of the Director of Public Housing at CMHA's Central Office so that the grievance may be discussed informally and possibly settled at an Informal Settlement Conference without a grievance hearing.
 - i. The Applicant shall present his grievance by 4:00 p.m. on or before the Seventh (7th) day from the date that the dispute originally arose except for those excluded from the Grievance process.
- 2. As soon as the grievance is received, it will be reviewed by the Resident's Housing Community Manager who will ascertain whether the exclusions set forth in the above apply to the grievance.
 - a. Should any one of the exclusions apply, the complainant will be notified in writing within a reasonable time that the matter raised is not subject to CMHA's grievance procedure, with the reason therefore.
 - b. If none of the exclusions apply, the Housing Community Manager shall schedule an Informal Settlement Conference with the Resident. Form 2.
 - c. Under no circumstance shall the Housing Community Manager schedule a Conference within three (3) days from the date that the Resident's grievance was received or fail to schedule a Conference within ten (10) day time period up to an additional six (6) days on any basis it considers just cause for a reasonable delay, including reasonable delays requested by the Resident.

3. Purpose of the Informal Settlement Conference
 - a. To amicably resolve the Resident's grievance without resorting to an Grievance Hearing.
 - b. The Housing Community Manager and the Resident should extensively discuss the grievance, the possible means of resolution, and reach a decision satisfactory to both parties, if possible.
 - c. Serious effort by the Authority and the Resident shall be made to resolve the grievance at this level (24 CFR § 966.54).
 - d. The Conference is not an adversarial proceeding and therefore, neither CMHA nor the Resident may have any legal representation at such conference. However, both CMHA and the Resident may present witnesses at the Conference.
 - e. Either the Authority or the Resident, or both may record the Informal Settlement Conference with an electronic recording device. Any such recording shall be done at the expense of and remain the property of the party making such recording. Prior to any participant activating any recording device, such participant shall inform all other participants of his intent to record the Informal Settlement Conference. If any participant objects, no one may record the Conference.
 - f. The Housing Community Manager shall conduct the Conference in a fair and impartial manner. The Resident shall be given full opportunity to discuss his grievance. However, the Housing Community Manager may limit the Conference to thirty (30) minutes. Additional time may be allowed at the discretion of the Housing Community Manager.
 - g. If at any time during the Conference, either the Resident or any other participant becomes disruptive, unruly, combative, or otherwise engages in violent, threatening or unacceptable conduct, the Housing Community Manager may terminate the Conference and render a decision in the form of the Summary of Informal Settlement Conference (hereinafter sometimes referred to as Summary) based upon the information adduced up to the time that the Conference was terminated. Form 3. If the Housing Community Manager terminates the Conference, he shall state this fact and the reasons therefore in his Summary.
4. Conference Summary Completion - after the Conference has been held, the Housing Community Manager shall complete the Summary (24 CFR §

966.54).

- a. The Summary shall specify the names of the participants, the date of the Conference, the nature of the Resident's grievance, the nature of the proposed disposition of the grievance and the specific reasons therefore, and shall specify the procedures by which a hearing under 24 CFR § 966.55 may be obtained if the Resident is not satisfied with the Summary.
- b. Every effort shall be made to issue the Summary at the Informal Settlement Conference.
- c. Under no circumstances shall the Housing Community Manager fail to either mail (by first-class mail, postage pre-paid) or personally deliver a copy of the Summary within seven (7) days of the date of the Conference.
- d. The Housing Community Manager shall make an original and one (1) copy of the Summary. The copy shall be mailed or personally delivered to the Resident. The original shall be retained by the Housing Community Manager and placed in the Resident File (24 CFR § 966.54).

H. Procedures for Resident to Obtain a Grievance Hearing

If the resident and/ or applicant is dissatisfied with the settlement arrived at in the Informal Settlement Conference, he may request a Grievance Hearing.

The Resident shall request a Grievance Hearing in the following manner:

1. By completing the Grievance Hearing Request Form (attached to the Summary) or a written request for a hearing and setting forth therein the reasons for his dissatisfaction and/ or grievance and the action or relief sought (24 CFR § 966.55 (A)(1) and (2)); and
2. By delivering or mailing a copy of the Summary and the completed Grievance Hearing Request Form or written request for a hearing to:
 - a. The Resident's Housing Community Management Office; or
 - b. The Columbus Metropolitan Housing Authority, Attention: Director of Housing Management and Services, 960 East Fifth Avenue, Columbus, Ohio 43201.

The Applicant shall request a Grievance Hearing in the following manner:

3. By completing the Grievance Hearing Request Form (attached to the Summary) or a written request for a hearing and setting forth therein the reasons for his dissatisfaction and/ or grievance and the action or relief sought (24 CFR § 966.55 (A)(1) and (2)); and
4. By delivering or mailing a copy of the Summary and the completed Grievance Hearing Request Form or written request for a hearing to:
 - a. The Columbus Metropolitan Housing Authority, Attention: Admissions & Occupancy , 960 East Fifth Avenue, Columbus, Ohio 43201.

In either event, the copy of the Summary and the completed Grievance Hearing Request Form or written request must be received by either the Housing Community Management Office or the Central Office of the Authority within ten (10) days after it was mailed or hand-delivered to the Resident.²

3. The Resident's failure to attach a copy of the Summary to the Grievance Hearing Request Form or to any written request for a hearing shall not be a reason to deny the Resident's request for a hearing.
4. If the complainant requests a Grievance hearing in a proper and timely manner, CMHA shall schedule a hearing on the grievance at the earliest time possible but in no case later than twenty (20) days (except for good cause shown) after CMHA receives the written request for hearing.
 - a. If the complainant fails to request a hearing within ten (10) days after the summary was mailed or hand-delivered to him, CMHA's Summary rendered as a result of the Informal Settlement Conference becomes final and CMHA is not obligated to offer the complainant a hearing unless the complainant can show good cause why he failed to proceed in accordance with this procedure (24 CFR § 966.55 (c) and (d). Also, the Resident's failure to request a grievance hearing does not affect his right to contest CMHA's decisions in a court hearing (24 CFR § 966.55 (c).

² Notwithstanding the above, a condition precedent to the utilization of the Grievance Procedure, is payment of all rent arrearages claimed by the Authority where the grievance concerns the amount of rent due under the lease (24 CFR § 966.55 (b) and 966.55 (e). The payment of rent arrearages shall be limited to all rent due and payable as of the first of the month preceding the month in which the grievance allegedly occurred, excluding any charges or fines (24 CFR § 966.55 (e). Thereinafter, the Resident must monthly deposit this sum (or such other amount of rent which may result from a change in the economic or family circumstances, if any, of the Resident during the pendency of the grievance) into an escrow account pending resolution of the grievance. Failure to do so by the Resident terminates the grievance in favor of the Authority (24 CFR § 966.55 (e).

I. Selection of Hearing Officer for Resident Grievances

A grievance hearing shall be conducted by an impartial person or persons appointed by CMHA after consultation with resident organizations, as described below:

1. CMHA shall nominate a slate of impartial persons to sit as Hearing Officers.
 - a. Such persons may include CMHA Board members, CMHA staff members, residents, professional arbitrators, or others.
 - b. Such persons shall not include a person who made or approved CMHA's action that is the subject of the grievance hearing or a subordinate of such person.
 - c. CMHA will check with each nominee to determine whether there is an interest in serving as a potential Hearing Officer, whether the nominee feels fully capable of impartiality, whether the nominee can serve without compensation, and what limitations on the nominee's time would affect such service.
 - d. Nominees will be informed that they will be expected to disqualify themselves from hearing grievances that involve personal friends, other residents of Communities in which they work or reside, or grievances in which they have some personal interest.
 - e. Nominees who are not interested in serving as Hearing Officers or whose time is too limited to make service practical will be withdrawn.
2. A slate of potential Hearing Officers nominated by CMHA shall be submitted to CMHA's resident organizations. Written comments from the organizations shall be considered by CMHA before the nominees are appointed as Hearing Officers.
3. When the comments from resident organizations have been received and considered, the nominees will be informed that they are CMHA's official grievance hearing committee. CMHA will subsequently contact committee members in random order to request their participation as Hearing Officers.

J. Escrow Deposit Required for a Hearing Involving Rent

1. Pursuant to 24 CFR § 966.55 (e), before a hearing is scheduled in any grievance involving the amount of rent which CMHA claims is due under the Resident's lease, the complainant shall pay to CMHA an amount equal to the

rent due and payable as the first of the month preceding the month in which the act or failure to act took place.

2. The complainant shall thereafter deposit the same amount of the monthly rent in CMHA's escrow account monthly until the complaint is resolved by decision of the Hearing Officer.
3. This requirement will not be waived by CMHA.
4. The failure of the Resident to make such payments will result in the termination of the Grievance Procedure.

K. Notice of Hearing to all Parties

1. Upon complainant's compliance with paragraphs (a), (d) and (e) of 24 CFR § 966.55, if appropriate, CMHA shall select a Hearing Officer, and with the advice and consent of the Hearing Officer shall promptly schedule a Grievance Hearing and mail or deliver a written notification to the complainant and the Hearing Officer specifying the date, time, and place of the Grievance Hearing.
2. All hearings shall be conducted during the business hours of CMHA.

L. Procedures Governing the Hearing

1. At the hearing, the duties of the Hearing Officer shall be similar to those of a judicial referee.
 - a. The Hearing Officer shall ensure that the hearing is conducted in an orderly fashion using, at his discretion, the powers granted in 24 CFR § 966.56.
 - b. In addition, it is the duty of the Hearing Officer to render a fair and equitable decision based solely on the facts and law presented at the Grievance Hearing.
2. The complainant shall be afforded a fair "due process" hearing, which shall include:
 - a. The opportunity to examine before the Grievance Hearing any CMHA documents, including records and regulations, that are directly relevant to the hearing. The Complainant shall be allowed to copy any such document at the complainant's expense. If CMHA does not make the

document available for examination upon request by the complainant, CMHA may not rely on such document at the grievance hearing.

- b. The right to be represented by counsel or other person chosen as the complainant's representative and to have such person make statements on the complainant's behalf.
 - c. The right to a private hearing unless the complainant requests a public hearing.
 - d. The right to present evidence and arguments in support of the complainant's complaint to controvert evidence relied on by CMHA or Housing Community Management, and to confront and cross examine all witnesses upon whose testimony or information CMHA or Housing Community Management relies; and
 - e. A decision based solely and exclusively upon the fact presented at the hearing.
3. The Hearing Officer may render a decision without proceeding with the hearing if he determines that the issue has been previously decided in another proceeding (24 CFR § 966.56 (c)).
 4. If the complainant of CMHA fails to appear at the scheduled hearing, the Hearing Officer may make a determination to postpone the hearing for a period not exceeding five (5) days, excluding holidays and weekends, or may make a determination that the party has waived his right to a hearing. Both the complainant and CMHA shall be notified of the determination by the Hearing Officer; Provided that a determination that the complainant has waived his right to a hearing shall not constitute a waiver of any right the complainant may have to contest CMHA's disposition of the grievance in court (24 CFR § 966.55 (d)).
 5. At the hearing, the complainant must first make a showing of an entitlement to the relief sought and, thereafter, CMHA must sustain the burden of justifying CMHA's action or failure to act against which the complaint is directed (24 CFR § 966.56 (e)).
 6. The hearing shall be conducted informally by the Hearing Officer.
 - a. Oral or documentary evidence pertinent to the facts and issues raised by the complaint may be received without regard to admissibility under the rules of evidence applicable to judicial proceedings.
 - b. The Hearing Officer shall require CMHA, the complainant, counsel, and

other participants or spectators to conduct themselves in an orderly fashion.

- c. Failure to comply with the directions of the Hearing Officer to obtain order may result in exclusion from the proceedings or in a decision adverse to the interests of the disorderly party and granting or denial of the relief sought, as appropriate (24 CFR § 966.56 (f)).
7. The complainant or CMHA may arrange, in advance, and at expense of the party making the arrangement, for a transcript of the hearing. Any interested party may purchase a copy of such transcript (24 CFR § 966.56 (g)).
 8. CMHA must provide reasonable accommodation for persons with disabilities to participate in the hearing. Reasonable accommodation may include qualified sign language interpreters, readers, accessible locations, or attendants. If the complainant is visually impaired, any notice to the complainant which is required under this procedure must be in an accessible format (24 CFR § 966.56 (h)).
 9. Decision of the Hearing Officer
 - a. The Hearing Officer shall prepare and issue a written decision on the complaint within fifteen (15) days after the hearing.
 - b.. The decision must state the conclusions, reasons, and otherwise comply with the decisional requirements set forth in 24 CFR § 966.56 and 24 CFR § 966.57, specifically including:
 - i. Whether the complainant is entitled to the relief sought and the reasons upon which such a conclusion is based; and
 - ii. Whether CMHA sustained the burden of justifying its actions or failure to act, together with the reasons upon which such a conclusion is based.
 - c. A copy of the decision shall be sent to the Complainant and CMHA.
 - i. CMHA shall retain a copy of the decision in the Complainant's file.
 - ii. A copy of the decision with all names, and identifying references deleted, shall also be maintained on file by CMHA and made available for inspection by a prospective complainant, his

representative, or the Hearing Officer (24 CFR § 966.57 (a)).

- d. Pursuant to 24 CFR § 966.57 (b), the decision of the Hearing Officer shall be binding on CMHA which shall take all actions, or refrain from any actions, necessary to carry out the decision unless CMHA's Board of Commissioners determines within thirty (30) days, and promptly notifies the complainant of its Determination that:
 - i. The grievance does not concern CMHA action or failure to act in accordance with or involving the Complainant's lease or CMHA regulations, with adversely affect the Complainant's rights, duties, welfare or status; or
 - ii. The decision of the Hearing Officer is contrary to applicable Federal, State or Local law, HUD Regulations, or requirements of the annual contributions contract between HUD and CMHA.
- e. A decision by the Hearing Officer or Board of Commissioners in favor of CMHA or which denies the relief requested by the Complainant in whole or in part shall not constitute a waiver or, not affect in any way, the rights of the Complainant to a trial or judicial review in any court proceedings which may be brought in the matter later (24 CFR § 966.57 (c)).

APPENDIX

Form 1

Form 2

Form 3

COLUMBUS METROPOLITAN HOUSING AUTHORITY

960 E 5TH AVENUE, COLUMBUS, OHIO 43201

(614) 294-4901

DATE: _____

NOTICE TO ALL RESIDENTS AND ALL APPLICANTS:

PLEASE BE ADVISED THAT YOU HAVE THE RIGHT TO BRING CERTAIN GRIEVANCES (DISPUTES OR PROBLEMS), INCLUDING BUT NOT LIMITED TO GRIEVANCES OVER THE REJECTION OR YOUR APPLICATION FOR HOUSING, RENT, MAINTENANCE CHARGES, OR CONDITIONS IN YOUR UNIT, BEFORE THE COLUMBUS METROPOLITAN HOUSING AUTHORITY THROUGH THE RESIDENT GRIEVANCE PROCEDURE.

INFORMATION ABOUT AND A COPY OF THE RESIDENT GRIEVANCE PROCEDURE CAN BE OBTAINED AT EACH HOUSING COMMUNITY MANAGEMENT OFFICE AND AT THE CENTRAL OFFICE OF THE COLUMBUS METROPOLITAN HOUSING AUTHORITY.

THE COLUMBUS METROPOLITAN HOUSING AUTHORITY ENCOURAGED EACH APPLICANT OR RESIDENT TO USE THE GRIEVANCE PROCEDURE TO RESOLVE HIS OR HER GRIEVANCE.

THANK YOU.

*Housing Community Manager: Please post in Management Office in three (3) conspicuous places.

FORM 1 (Rev. 5-23-94)

COLUMBUS METROPOLITAN HOUSING AUTHORITY
960 E FIFTH AVENUE, COLUMBUS, OHIO 43201
(614) 294-4901

DATE OF NOTICE: _____

(Must be mailed to Tenant(s) on same date)

TO: _____

(List all Adult members of Household)

_____ Apt. # _____

Columbus, Ohio 432 _____

RE: Informal Settlement Conference

Dear Tenant(s):

On the _____ day of _____, 19 _____, you presented grievance to the Columbus Metropolitan Housing Authority (CMHA). Pursuant to CMHA's Resident Grievance Procedure, I have scheduled an Informal Settlement Conference ("Conference") so that you may discuss your grievance with me. Your Conference has been scheduled for the _____ day of _____, 19 _____ at _____ o'clock ____M.

The Conference will be held at _____

The purpose of the Conference is to amicably resolve your grievance without resorting to a Grievance Hearing. I intend to extensively discuss your grievance, the possible means of resolutions and reach a decision satisfactory to you and CMHA, if possible. The Conference is not an adversarial proceeding and therefore, neither CMHA nor the Tenant may have any legal representation at such Conference. However, both CMHA and the Tenant may present witnesses at the Conference. I shall conduct the Conference in a fair and impartial manner. You will be given full opportunity to discuss your grievance.

You should review the Resident Grievance Procedure prior to attending the Conference so that you may become familiar with your rights. IF YOU DO NOT HAVE A COPY OF THE RESIDENT GRIEVANCE PROCEDURE, INFORMATION ABOUT AND A COPY OF THE RESIDENT GRIEVANCE PROCEDURE CAN BE OBTAINED AT YOUR HOUSING COMMUNITY MANAGEMENT OFFICE AND AT THE CENTRAL OFFICE OF THE COLUMBUS METROPOLITAN HOUSING AUTHORITY.

Sincerely yours,

By: _____

Housing Community Manager

MEMORANDUM OF SERVICE

I hereby certify that pursuant to Paragraph 14 of the LEASE, I served foregoing letter on the above noted Tenant(s) at the above noted address this ____ day of _____, 19____ by _____ (check) regular first class mail, postage prepaid or _____ (check) by hand-delivery

BY: _____

FORM 2 (Rev. 5-23-94)

COLUMBUS METROPOLITAN HOUSING AUTHORITY

960 E FIFTH AVENUE, COLUMBUS, OHIO 43201

(614) 294-4901

III. The disposition on your grievance is:

4V The specific reason for the disposition on your grievance are:

V. If you are not satisfied with the disposition of your grievance, you may obtain a Grievance Hearing on your grievance by complying with the following procedures:

1. You must complete the Grievance Hearing Request Form (attached hereto as "Exhibit A") or a written request for a hearing. You must state your reasons for your dissatisfaction and/ or grievance and the action or relief sought; AND
2. Deliver or mail a copy of the Summary and the completed Grievance Hearing Request Form or written request for a hearing to:
 - a. Your Housing Community Management Office; OR
 - b. The Columbus Metropolitan Housing Authority, Attention: Director of Housing Management and Services. 960 E. Fifth Avenue, Columbus, Ohio 43201.

In either event, the copy of the Summary and the completed Grievance Hearing Request Form or written request must be received by either the Housing Community Management Office or the Central Office of the Authority within ten

(10) days after it was mailed or hand-delivered to you.

Your failure to attach a copy of the Summary to the Grievance Hearing Request Form to any written request for a hearing shall not be a reason to deny the Tenant's request for a hearing.

NOTE: A condition precedent to the utilization of the Grievance Procedure is the payment of all rent arrearages claimed by CMHA where the grievance conditions the amount of rent due under your Lease. The payment of rent arrearages will be limited to all rent due and payable as of the first of the month preceding the month in which the grievance allegedly occurred, excluding any charges or fines. Thereafter, you must monthly deposit this sum (or such other amount of rent which may result from a change in your economic or family circumstances, if any, during the pendency of the grievance) into CMHA's escrow account pending resolution of the grievance. Your failure to do so terminates the grievance in favor of the Authority.

If you request a Grievance Hearing in a proper and timely manner, CMHA shall schedule a hearing on the grievance at the earliest time possible but in no case later than twenty (20) days (except for good cause shown) after CMHA receives the written request for hearing.

If you fail to request a hearing within ten (10) days after the Summary was mailed or hand-delivered to you, CMHA's Summary rendered as a result of the Informal Settlement Conference becomes final and CMHA is not obligated to offer you a hearing unless you show good cause why you failed to proceed in accordance with CMHA's Resident Grievance Procedure. Also, your failure to request a Grievance Hearing does not affect the right to contest CMHA's decision in a court hearing.

Sincerely yours,

By: _____

Housing Community Manager

MEMORANDUM OF SERVICE

I hereby certify that pursuant to Paragraph 14 of the LEASE, I served foregoing letter on the above noted Tenant(s) at the above noted address this ____ day of _____, 19____ by

_____ (check) regular first class mail, postage prepaid or

_____ (check) by hand-delivery

BY: _____

EXHIBIT A

RESIDENT GRIEVANCE HEARING REQUEST FORM

The undersigned Tenant(s) hereby notify(s) CMHA that he/ she/ they is (are) dissatisfied with the CMHA Summary of the Informal Settlement Conference which was held on the ____ day of _____, 19____

The reason(s) for my (our) grievances are:

I (We) hereby request a Grievance Hearing on the foregoing grievance and I (We) request the following relief or action on said grievance:

Tenant Tenant

Tenant Tenant

FORM 3 (Rev. 5-23-94)

XIII. DEFINITIONS AND PROCEDURES TO BE USED IN DETERMINING
INCOME AND RENT

A. Annual Income (24 CFR 913.106)

Annual income is the total income from all sources, including net income derived from assets, received by the family head and spouse (even if temporarily absent) and by each additional family member including all net income from assets for the 12-month period following the effective date of initial determination or reexamination of income, exclusive of income that is temporary, non-recurring, or sporadic as defined below or is specifically excluded from income by other federal statute. Annual income includes but is not limited to:

1. The full amount before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services;
2. The net income from operation of a business or profession, including any withdrawal of cash or assets from the operation of the business. Expenditures for business expansion or amortization of capital indebtedness will not be used as deductions in determining the net income from a business. An allowance for the straight line depreciation of assets used in a business or profession may be deducted as provided in IRS regulations. Withdrawals of cash or assets will not be considered income when used to reimburse the family for cash or assets invested in the business;
3. Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness will not be used as deductions in determining net income. An allowance for the straight line depreciation of real or personal property is permitted. Withdrawals of cash or assets will not be considered income when used to reimburse the family for cash or assets invested in the property.

Where the Family has Net Family Assets in excess of \$5,000. Annual Income will include the greater of the actual income derived from all Net Family Assets or a percentage of the value of such Assets based on the current passbook savings rate as determined by HUD (currently 2%);

4. The full amount of periodic payments received from social security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts.

[See below for treatment of lump sum payments for the delayed or deferred periodic payment of social security or supplemental security income benefits.]

5. Payment in lieu of earnings, such as unemployment and disability compensation, worker's compensation, and severance pay.
6. All welfare assistance payments received by or on behalf of any family member. See 24 CFR § 913.106 (b)(6) for welfare rules applicable to “as-

paid” States;

7. Periodic and determinable allowances, such as alimony and child support payments, and regular cash contributions or gifts received from persons not residing in the dwelling;
8. All regular pay, special pay, and allowances of a family member in the Armed Forces. (See paragraph B. 7. below concerning hazard pay for exposure to hostile fire.)

B. Items not included in Annual Income [24 CFR § 913.106]

Annual Income does not include the following:

1. Income from the employment of children (including fostered children) under the age of 18 years;
2. Payments received for the care of foster children or foster adults (usually individuals with disabilities, unrelated to the resident family, who are unable to live alone);
3. Lump sum additions to family assets, such as inheritances, insurance payments (including payments under health, and accident insurance, and workers’ compensation) capital gains, and settlement for personal property losses; (but see paragraphs 4 and 5 above if the payments are or will be periodic in nature);
4. Amounts received by the family that are specifically for, or in reimbursement of the cost of medical expenses for any family member;
5. Income of a live-in aide, provided the person meets the definition of a live-in aide;
6. The full amount of student financial assistance paid directly to the student or the educational institution. (FR Vol. 60, #65/ 5 April 1995)
7. The special pay to a family member serving in the Armed Forces who is exposed to hostile fire;
8. Amounts received under HUD funded training programs (e.g. Step-up program; excludes stipends, wages, transportation payments, child care vouchers, etc. for the duration of the training);
 - a. Amounts received by a person with disabilities that are disregarded for a limited time for purposes of Supplemental Security Income and benefits that are set aside for use under a Plan to Attain Self-Sufficiency (PASS);

- b. Amounts received by a participant in other publicly assisted programs which are specifically for, or in reimbursement of, out-of-pocket expenses incurred (special equipment, transportation, child care, etc.) to allow participation in a specific program ;
 - c. A resident services stipend. A resident services stipend is a modest amount (not to exceed \$200/month) received by a public housing resident for performing a service for the PHA, on a part-time basis, that enhances the quality of life in public housing. Such services may include but are not limited to, fire patrol, hall monitoring, lawn maintenance, and resident initiatives' coordination. No resident may receive more than one such stipend during the same period of time. (FR Vol. 60, #65/ 5 April 1995)
 - d. Compensation from State or local employment training programs and training of family members as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for a limited period as determined in advance by the PHA. (FR Vol. 60, #65/ 5 April 1995)
9. Temporary, non-recurring, or sporadic income (including gifts); or
 10. For all initial determinations and reexamination of income on or after 23 April 1993, reparation payments paid by foreign governments pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;
 11. Earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of the household and spouse); (FR Vol. 60, #65/ 5 April 1995)
 12. Adoption assistance payments in excess of \$480 per adopted child; (FR Vol. 60, #65/ 5 April 1995)
 13. Applicability of Exclusion:
 - a. The earnings and benefits to any resident resulting from the participation in a program providing employment training and supportive services in accordance with the Family Support Act of 1988 (42 U.S.C. 1437 et seq.), OR any comparable Federal, State or local law during the exclusion period. (FR Vol. 60, #65/ 5 April 1995) For purposes of this paragraph the following definitions apply:
 - i. Comparable Federal, State or local law means a program providing employment training and supportive services that: (a) is

authorized by a Federal, State or local law; (b) is funded by the Federal, State or local government; (c) is operated or administered by a public agency; and (d) has as its objective to assist participants in acquiring employment skills.

- ii. Exclusion period means the period during which the resident participates in a program described in this section PLUS 18 months from the date the resident begins the first job acquired by the resident after completion of such programs that IS NOT funded by public housing assistance under the U.S. Housing Act of 1937 (42 U.S.C.1437 et seq.). If the resident is terminated from employment without good cause, the exclusion period will end.
 - iii. Earnings and benefits mean the incremental earnings and benefits resulting from a qualifying employment training program or subsequent job.
- b. The following is a list of benefits excluded by other Federal Statute as of 3 August 1993 [FR Vol. 58, #147] :
- The value of the allotment provided to an eligible household for coupons under the Food Stamp Act of 1977 [7 USC 2017 (h)].
 - Payments to volunteers under the Domestic Volunteer Service Act of 1973 [42 USC 5044 (g), 5088].
- Examples of programs under this Act include but are not limited to:
- *the Retired Senior Volunteer Program (RSVP), Foster Grandparent Program (FGP), Senior Companion Program (SCP), and the Older American Committee Service Program;*
 - *National Volunteer Antipoverty Programs such as VISTA, Peace Corps, Service Learning Program, and Special Volunteer Programs;*
 - *Small Business Administration Programs such as the National Volunteer Program to Assist Small Business and Promote Volunteer Service to Persons with Business Experience, Service Corps of Retired Executives (SCORE), and Active Corps of Executives (ACE).*
- Payments received under the Alaska Native Claims Settlement Act [43 USC 1626 (a)].
 - Income derived from certain sub-marginal land of the United States that is held in trust for certain Indian tribes [(25 USC 459e)].
 - Payments or allowances made under the Department of Health and

Human Services' Low-Income Home Energy Assistance Program [42 USC 8624 (f)].

- Payments received under programs funded in whole or in part under the Job Training Partnership Act (29 USC. 1552 (b))
- Income derived from the disposition of funds of the Grand River Band of Ottawa Indians (Pub. L. 94-540, 90 Stat. 2503-04);
- The first \$2000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the Court of Claims (25 USC. 1407-08), or from funds held in trust for an Indian Tribe by the Secretary of Interior [25 SC. 117b, 1407]; and
- Amounts of scholarships funded under Title IV of the Higher Education Act of 1965 including awards under the Federal work-study program or under the Bureau of Indian Affairs student assistance programs [20 USC 1087 uu].
- *Examples of Title IV programs include but are not limited to: Basic Educational Opportunity Grants (Pell Grants), Supplemental Opportunity Grants, State Student Incentive Grants, College Work Study, and Byrd Scholarships.*
- Payments received from programs funded under Title V of the Older Americans Act of 1965 [42 USC 3056 (f)].
- *Examples of programs under this act include but are not limited to: Senior Community Services Employment Program (CSEP), National Caucus Center on the Black Aged, National Urban League, Association National Pro Personas Mayores, National Council on Aging, American Association of Retired Persons, National Council on Senior Citizens, and Green Thumb.*
- Payments received after January 1, 1989 from the Agent Orange Settlement Fund or any other fund established in the In Re Orange product liability litigation, M.D.L. No 381 (E.D.N.Y.)
- Payments received under the Maine Indian Claims Settlement Act of 1980 (Pub. L. 96-420, 94 Stat. 1785)
- The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990 (42 USC. 9858q)
- Earned income tax credit refund payments received on or after January 1, 1991 (26 USC. 32 (j)).

13.1 Required Verification:

- a. CMHA's only choice is a written third party verification to substantiate

applicant or resident income exclusion claims.

Applicants must cooperate fully in obtaining or providing the necessary

14. Deferred periodic payments of supplemental security income and social security benefits that are received in a lump sum payment. (FR Vol. 60, #65/ 5 April 1995)
15. Amounts received by the family in the form of refunds or rebates under state or local law for property taxes paid on the dwelling unit.
16. Amounts paid by a State agency to a family with a developmentally disabled family member living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home. (FR Vol. 60, #65/ 5 April 1995)
17. Amounts specifically excluded by any other Federal Statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under the United States Housing Act of 1937. (A notice will be published by HUD in the Federal Register identifying the benefits that qualify for this exclusion. Updates will be published and distributed when necessary.)

C. Anticipating Annual Income [24 CFR 913.106 (d)]

If it is not feasible to anticipate income for a 12-month period, the Authority may use the annualized income. (This method would be used for teachers who are only paid for 9 months or for tenants receiving unemployment compensation.)

D. Adjusted Income (24 CFR 913.102)

Adjusted Income (the income upon which rent is based) means Annual Income less the following deductions and exemptions.

For All Families

1. Child Care Expenses — A deduction of amounts anticipated to be paid by the family for the care of children under 13 years of age for the period for which Annual Income is computed.

BUT ONLY when such care is necessary to enable a family member to be gainfully employed or to further his/her education. Amounts deducted must be un-reimbursed expenses and shall not exceed: (a) the amount of income earned by the family member released to work; or (b) an amount determined to be reasonable by CMHA when the expense is incurred to permit education.
2. Dependent Deduction — An exemption of \$480 for each member of the family residing in the household (other than the head of household, or spouse,

Live-in Aide, or foster child) who is under eighteen years of age or who is eighteen years of age or older and disabled, handicapped, or a full-time student.

3. Handicapped Expenses — a deduction of un-reimbursed amounts paid for attendant care or auxiliary apparatus expenses for handicapped family members where such expenses are necessary to permit a family member(s), including the handicapped/disabled member, to be employed. In no event may the amount of the deduction exceed the employment income earned by the family member(s) freed to work.

Equipment and auxiliary apparatus may include but are not limited to: wheelchairs, lifts, reading devices for the visually handicapped, and equipment added to cars and vans to permit their use by the handicapped or disabled family member.

- a. For non-elderly families and elderly families without medical expenses: the amount of the deduction equals the cost of all un-reimbursed expenses for handicapped care and equipment less three percent of Annual Income, provided the amount so calculated does not exceed the employment income earned.
- b. For elderly families with medical expenses: the amount of the deduction equals the cost of all un-reimbursed expenses for handicapped care and equipment less three percent of Annual Income (provided the amount so calculated does not exceed the employment income earned) PLUS medical expenses as defined below.

For elderly and disabled families only:

4. Medical Expense Deduction — A deduction of un-reimbursed Medical Expenses, including insurance premiums, anticipated for the period for which Annual Income is computed.

Medical expenses include but are not limited to: services of physicians and other health care professionals, services of health care facilities, insurance premiums (including the cost of Medicare), prescription and non-prescription medicines, transportation to and from treatment, dental expenses, eyeglasses, hearing aids and batteries, attendant care (unrelated to employment of family members), and payments on accumulated medical bills. To be considered by CMHA for the purpose of determining a deduction from income the expenses claimed must be verified first via third party and if unable to obtain third party via receipts.

- a. For elderly families without handicapped expenses: The amount of the deduction shall equal total medical expenses less three percent of annual income.

- b. For elderly families with both handicapped and medical expenses: the amount of the deduction is calculated as described in paragraph 3 (b) above.
- 5. Elderly/Disabled Household Exemption — An exemption of \$400 per household, see Definitions in the next section.

XIV. DEFINITIONS OF TERMS USED IN THIS STATEMENT OF POLICIES

- 1. Accessible dwelling units -- when used with respect to the design, construction or alteration of an individual dwelling unit, means that the unit is located on an accessible route and when designed, constructed, altered, or adapted can be approached, entered, and used by individuals with physical handicaps. A unit that is on an accessible route and is adaptable and otherwise in compliance with the standards set forth in 24 CFR § 8.32 & § 40 [the Uniform Federal Accessibility Standards] is “accessible” within the meaning of this paragraph.

When an individual dwelling unit in an existing facility is being made accessible for use by a specific individual, the unit will be deemed accessible when it meets the standards that address the impairment of that individual.

- 2. Accessible Facility - means all or any portion of a facility other than an individual dwelling unit used by individuals with physical handicaps. [24 CFR § 8.21]
- 3. Accessible Route - For persons with a mobility impairment, a continuous unobstructed path that complies with space and reach requirements of the Uniform Federal Accessibility Standards. For persons with hearing or vision impairments, the route need not comply with requirements specific to mobility. [24 CFR § 8.3 & § 40.3.5]
- 4. Adaptability - Ability to change certain elements in a dwelling unit to accommodate the needs of handicapped and non-handicapped persons; or ability to meet the needs of persons with different types & degrees of disability. [24 CFR § 8.3 & § 40.3.5]
- 5. Allocation Plan - The Plan submitted by the HA and approved by HUD under which the HA is permitted to designate a building or portion of a building for occupancy by Elderly Families or Disabled Families. [24 CFR § 945]
- 6. Alteration - any change in a facility or its permanent fixtures or equipment. It does not include: normal maintenance or repairs, re-roofing, interior decoration or changes to mechanical systems. [24 CFR § 8.3 & § 8.23 (b)]

7. Applicant - a person or a family that has applied for admission to housing.
8. Area of Operation - The jurisdiction of the HA as described in State law and the HA's Articles of Incorporation.
9. Assets - Assets means "cash (including checking accounts), stocks, bonds, savings, equity in real property, or the cash value of life insurance policies. Assets do not include the value of personal property such as furniture, automobiles and household effects." IMPORTANT: See the definition of Net Family Assets, for assets used to compute annual income. (24 CFR 913.102 for definition of Net Family Assets)
10. Auxiliary Aids - means services or devices that enable persons with impaired sensory, manual, or speaking skills to have an equal opportunity to participate in and enjoy the benefits of programs or activities. [24 CFR § 8.3]
11. Care attendant - a person that regularly visits the unit of a HA resident to provide supportive or medical services. Care attendants have their own place of residence (and if requested by HA must demonstrate separate residence) and do not live in the public housing unit. Care attendants have no rights of tenancy.
12. Co-head of household - a household where two persons are held responsible and accountable for the family.
13. Dependent - A member of the household, other than head, spouse, sole member, foster child, or Live-in Aide, who is under 18 years of age, or 18 years of age or older and disabled, handicapped, or a full-time student.[24 CFR § 913.102)
14. Designated Family - means the category of family for whom HA elects to designate a project (e.g. elderly family in a project designated for elderly families) in accordance with the 1992 Housing Act. (24 CFR § 945.105)
15. Designated housing (or designated project) - a project(s), or portion of a project(s) designated for elderly only or for disabled families only in accordance with [24 CFR § 945. 105]
16. Disabled Family - A family whose head, spouse or sole member is a person with disabilities. (Person with disabilities is defined later in this section.) The term includes two or more persons with disabilities living together, and one or more such persons living with one or more persons including live-in aides determined to be essential to the care and well-being of the person or persons with disabilities. A disabled family may include persons with disabilities who are elderly. (24 CFR § 945.105)

17. Displaced Person - A person displaced by government action or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise recognized pursuant to Federal disaster relief laws. This definition is used for eligibility determinations only. It should not be confused with the Federal preference for involuntary displacement. (24 CFR § 913.103)
18. Divestiture Income - Imputed income from assets disposed of by applicant or resident in the last two years at less than fair market value. (See the definition of Net Family Assets (24 CFR § 913.103) in this section.)
19. Elderly Family - A family whose head or spouse (or sole member) is at least 62 years of age. It may include two or more elderly persons living together, and one or more such persons living with one or more persons, including live-in aides, determined to be essential to the care and well-being of the elderly person or persons. An elderly family may include elderly persons with disabilities and other family members who are not elderly. (24 CFR § 945.105)
20. Elderly Person - A person who is at least 62 years of age. (24 CFR § 945.105)
21. Family - Two or more persons (with or without children) regularly living together, related by blood, marriage, adoption, guardianship or operation of law who will live together in HA housing; OR two or more persons who are not so related, but are regularly living together, can verify shared income or resources who will live together in HA housing and whose income and resources are available to meet the family's needs or a single who qualified under the HUD Regulations..

The term family also includes: Elderly family (Definition #19), Near elderly family (Definition #33) disabled family (Definition #16), displaced person (Definition #17), single person (Definition #42), the remaining member of a tenant family, a foster care arrangement, or a kinship care arrangement (Definition #26). Other persons, including members temporarily absent (e.g. a child temporarily placed in foster care or a student temporarily away at college), may be considered a part of the applicant family's household if they are living or will live regularly with the family. [24 CFR §§912 and 960]

Live-in Aides (Definition #27) may also be considered part of the applicant family's household. However, live-in aides are not considered family members and have no rights of tenancy or

continued occupancy.

For purposes of continued occupancy: the term family also includes the remaining member of a resident family with the capacity, as defined by DC law, to execute a lease.

22. Full-Time Student - A person who is carrying a subject load that is considered full-time for day students under the standards and practices of the educational institution attended. Educational institution shall include but not be limited to: college, university, secondary school, vocational school or trade school (24 CFR 913.102).
23. Head of the Household - Head of the household means the family member (identified by the family) who is held responsible and accountable for the family.
24. Individual with handicaps, Section 504 definition [24 CFR § 8.3] --

The Section 504 definitions of Individual with Handicaps and Qualified Individual with handicaps are not the definitions used to determine program eligibility. Instead, use the definition of person with disabilities as defined later in this section. Note: the Section 504, Fair Housing, and Americans with Disabilities Act (ADA) definitions are similar. ADA uses the term “individual with a disability”.

Individual with handicaps means any person who has:

- a. A physical or mental impairment that:
 - substantially limits one or more major life activities;
 - has a record of such an impairment;
 - or is regarded as having such an impairment.
- b. For purposes of housing programs, the term does not include any individual who is an alcoholic or drug abuser whose current use of alcohol or drugs prevents the individual from participating in the program or activity in question, or whose participation, by reason of such current alcohol or drug abuse, would constitute a direct threat to property or the safety of others.
- c. Definitional elements:
 - i. As used in this definition the phrase, “physical or mental impairment” means any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: Neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive;

genito-urinary; hemic and lymphatic; skin; and endocrine; or

- ii. Any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term “physical or mental impairment” includes, but is not limited to, such diseases and conditions as orthopedic, visual, speech and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, drug addiction and alcoholism.
- iii. “Major life activities” means: functions such as caring for one’s self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working.
- iv. “Has a record of such an impairment” means: has a history of, or has been mis-classified as having, a mental or physical impairment that substantially limits one or more major life activities.

- v. “Is regarded as having an impairment” means:

has a physical or mental impairment that does not substantially limit one or more major life activities but that is treated by a recipient as constituting such a limitation;

has a physical or mental impairment that substantially limits one or more major life activities only as result of the attitudes of others toward such impairment; or

has none of the impairments defined in this section but is treated by a recipient as having such an impairment.

NOTE: A person would be covered under the first item if HA refused to serve the person because of a perceived impairment and thus “treats” the person in accordance with this perception. The last two items cover persons who are denied the services or benefits of HA’s housing program because of myths, fears, and stereotypes associated with the disability or perceived disability.

- d. The 504 definition of handicap does not include homosexuality, bisexuality, or transvestitism. Note: These characteristics do not disqualify an otherwise disabled applicant/resident from being covered.
- e. The 504 definition of individual with handicaps is a civil rights

definition. To be consider for admission to public housing a person must meet the program definition of person with disabilities found in this section.

25. Kinship care - an arrangement in which a relative or non-relative becomes the primary care giver for a child or children but is not the biological parent of the child or children. The primary care giver need not have legal custody of such child or children to be a kinship care giver under this definition. (Definition provided by the Kinship Care Project, National Association for Public Interest Law)
26. Live-in Aide -- A person who resides with an elderly person(s) or person(s) with disabilities and who: (a) is determined by HA to be essential to the care and well being of the person(s); (b) is not obligated to support the family member; and (c) would not be living in the unit except to provide the necessary supportive services (24 CFR 913.102).

HA policy on Live-in Aides stipulates that:

Before a Live-in Aide may be moved into a unit, a third-party verification must be supplied that establishes the need for such care and the fact that the person cared for will be able to remain in the unit and comply with the lease terms as the result of such care;

Move-in of a Live-in Aide must not result in overcrowding of the existing unit (although, a reasonable accommodation for a resident with a disability may be to move the family to a larger unit);

Live-in Aides have no right to the unit as a remaining member of a resident family;

- a. Relatives who satisfy the definitions and stipulations above may qualify as a Live-in Aide but only if they sign a statement prior to moving in relinquishing all rights to the unit as the remaining member of a resident family.
- b. A live-in aide can be a single person. A live-in aide with a family may also be considered for admission to the unit provided that the addition of the Live-in Aide's family does not result in overcrowding of the existing unit. The adult members of the live-in aide's family must meet HA's screening criteria.
- c. A Live-in Aide will be required to meet HA's screening requirements with respect to past behavior especially:

** A record of disturbance of neighbors, destruction of property, or living or housekeeping habits at present or prior residences which may adversely affect the health, safety, or welfare of other tenants or neighbors;*

* *Criminal activity such as crimes of physical violence to persons or property and other criminal acts including drug-related criminal activity which would adversely affect the health, safety, or welfare of other residents or staff or cause damage to the unit or the development; and*

* *A record of eviction from housing or termination from residential programs.*

27. Low-Income Household - A family whose annual income does not exceed 80 percent of the median income for the area as determined by HUD with adjustments for smaller and larger families (24 CFR § 913.102).
28. Medical Expense Allowance -- For purposes of calculating adjusted income for elderly or disabled families only, medical expenses mean the medical expense in excess of 3% of Annual Income, where these expenses are not compensated for or covered by insurance (24 CFR § 913.102).
29. Minor - A minor is a person less than 18 years of age. An unborn child will not be considered as a minor. (See definition of dependent.) Some minors are permitted to execute contracts, provided a court declares them “emancipated”. (Not a HUD definition, best practice)
30. Mixed Population Project - means a public housing project for elderly and disabled families. The HA is not required to designate this type of project under 24 CFR 945 or prepare an allocation plan. [24 CFR 945.105]
31. Multifamily housing project - For purposes of Section 504, means a project containing five or more dwelling units. [24 CFR § 8.3]
32. Near-elderly family - means a family whose head, spouse, or sole member is a near-elderly person (at least 50 but less than 62 years of age). The term includes two or more near-elderly persons living together, and one or more such persons living with one or more persons who are determined to be essential to the care or well-being of the near-elderly person or persons. A near-elderly family may include other family members who are not near-elderly. [24 CFR § 945.105]
33. Near-elderly person - means a person who is at least 50 years of age but below 62, who may be a person with a disability. [24 CFR § 945.105]
34. Net Family Assets -- The net cash value, after deducting reasonable costs that would be incurred in disposing of:
 - a. Real property (land, houses, mobile homes)
 - b. Savings (CDs, IRA or KEOGH accounts, checking and savings accounts, precious metals)

- c. Cash value of whole life insurance policies
- d. Stocks and bonds (mutual funds, corporate bonds, savings bonds)
- e. Other forms of capital investments (business equipment)
- f. Net cash value is determined by subtracting the reasonable costs likely to be incurred in selling or disposing of an asset from the market value of the asset. Examples of such costs are: brokerage or legal fees, settlement costs for real property, or penalties for withdrawing saving funds before maturity.
- g. Net Family assets also include the amount in excess of any consideration received for assets disposed of by an applicant or resident for less than fair market value during the two years preceding the date of the initial application or re-examination. This does not apply to assets transferred as the result of a foreclosure or bankruptcy sale.
- h. In the case of a disposition as part of a separation or divorce settlement, the disposition will not be considered to be less than fair market value if the applicant or resident receives important considerations not measurable in dollar terms (24 CFR § 913.102).

35. Person with disabilities³ (24 CFR § 945.105)

means a person who —

- a. Has a disability as defined in Section 223 of the Social Security Act (42 USC. 423); or,
- b. Is determined to have a physical or mental impairment that:
 - i. Is expected to be of long continued and indefinite duration;
 - ii. Substantially impedes his/her ability to live independently; and,
 - iii. Is of such nature that such disability could be improved by more suitable housing conditions; or,
- c. Has a developmental disability as defined in Section 102 (5) (b) of the Developmental Disabilities Assistance and Bill of Rights Act [42 USC. 6001 (5)].

36. Portion of project - includes, one or more buildings in a multi-building project; one or more floors of a project or projects; a certain number of dwelling units in a project or projects. (24 CFR § 945.105)

37. Project, Section 504 - means the whole of one or more residential structures & appurtenant structures, equipment, roads, walks, & parking lots which are

³ NOTE: this is the program definition for public housing. The 504 definition does not supersede this definition. [24 CFR 8.4 (c) (2)]

covered by a single contract for Federal financial assistance or application for assistance, or are treated as a whole for processing purposes, whether or not located on a common site. [24 CFR § 8.3]

38. Qualified Individual with handicaps, Section 504 - with respect to any non-employment program or activity which requires a person to perform a service or to achieve a level of accomplishment, means an individual with handicaps who meets the essential eligibility requirements and who can achieve the purpose of the program or activity without modifications in the program or activity that the recipient (HA) can demonstrate would result in a fundamental alteration in its nature. (24 CFR § 8.3)
 - a. Essential eligibility requirements include: ...stated eligibility requirements such as income as well as other explicit or implicit requirements inherent in the nature of the program or activity, such as requirements that an occupant of multifamily housing be capable of meeting the recipient's selection criteria and be capable of complying with all obligations of occupancy with or without supportive services provided by persons other than the recipient.
 - b. For example, a chronically mentally ill person whose particular condition poses a significant risk of substantial interference with the safety or enjoyment of others or with his or her own health or safety in the absence of necessary supportive services may be "qualified" for occupancy in a project where such supportive services are provided by the recipient as a part of the assisted program. The person may not be 'qualified' for a project lacking such services.
39. Service Provider - means a person or organization qualified and experienced in the provision of supportive services, and that is in compliance with any licensing requirements imposed by State or local law for the type of service or services to be provided. The service provider may provide the service on either a for-profit or not-for-profit basis. (24 CFR § 945.105)
40. Single Person - A person who is not an elderly person, a person with disabilities, a displaced person, or the remaining member of a resident family (24 CFR § 945.105).
41. Standard Permanent Replacement Housing [24 CFR § 960.213 (a) (2)] - such housing is
 - a. decent, safe, and sanitary;
 - b. adequate for the family size;
 - c. occupied pursuant to a lease or occupancy agreement, and
 - d. Standard Permanent Replacement Housing does not include a transient

facility such as a motel, hotel, or temporary shelter for victims of domestic violence or homeless families. In the case of domestic violence, the term does not include the housing unit which the applicant, applicant's spouse, or other member shared with the person who engaged in the violence.

42. Spouse - Spouse means the husband or wife of the head of the household.
43. Supportive Services Plan - (24 CFR § 945)
44. Tenant Rent - The amount payable monthly by the Family as rent to HA. Where all utilities (except telephone) and other essential housing services are supplied by the Authority, Tenant Rent equals Total Tenant Payment. Where some or all utilities (except telephone) and other essential housing services are not supplied by the HA and the cost thereof is not included in the amount paid as rent, Tenant Rent equals Total Tenant Payment less the Utility Allowance (24 CFR § 913.102).
45. Total Tenant Payment (TTP) - The TTP is calculated using the following formula:

The greater of 30% of the monthly Adjusted Income (as defined in these policies) or 10% of the monthly Annual Income (as defined in these policies).
If the Resident pays the utilities, the amount of the Utility Allowance is deducted from the TTP. See the definition for Tenant Rent. (24 CFR §913.102).
46. Uniform Federal Accessibility Standards - Standards for the design, construction, and alteration of publicly owned residential structures to insure that physically handicapped persons will have ready access to and use of such structures. The standards are set forth in Appendix A to 24 CFR Part 40. See cross reference to UFAS in 504 regulations, [24 CFR § 8.32 (a)].
47. Utilities - Utilities means water, electricity, gas, other heating, refrigeration and cooking fuels, trash collection, and sewerage services. Telephone service is not included as a utility (7465.1 REV, APP. 3 & 24 CFR § 965.473).
48. Very Low-Income Family - Very low-income family means a family whose Annual Income does not exceed 50 percent of the median Annual Income for the area, with adjustments for smaller and larger families, as determined by the Secretary of Housing and Urban Development (24 CFR § 913.102).
49. Utility Reimbursement - Funds that are reimbursed to a resident or to the utility company on the resident's behalf if the utility allowance exceeds the Total Tenant Payment (24 CFR § 913.102).
50. Exceptions to Minimum Rent [QWRA sec. 507]

- a) Exception - to leave out or exclude from.
- b) Suspension - a period of time (90 days) in which payments of minimum rent will be put on hold until determination of a long-term financial hardship is determined.
- c) Hardship - extreme financial change(s) that would cause difficulty in meeting obligation to pay rent including changes in family composition.
- d) Local Assistance - City and County government.

Exceptions to Minimum Rent [QWRA sec. 507]

- 51. Exception - to leave out or exclude from.
- 52. Suspension - a period of time (90 days) in which payments of minimum rent will be put on hold until determination of a long-term financial hardship is determined.
- 53. Hardship - extreme financial change(s) that would cause difficulty in meeting obligation to pay rent including changes in family composition.
- 54. Local Assistance - City and County government.
- 55. Family - Two or more persons (with or without children) regularly living together, related by blood, marriage, adoption, guardianship or operation of law who will live together in HA housing; OR two or more persons who are not so related, but are regularly living together, can verify shared income or resources who will live together in HA housing.

The term family also includes: Elderly family , Near elderly family, disabled family, displaced person, single person, the remaining member of a tenant family, a foster care arrangement, or a kinship care arrangement (. Other persons, including members temporarily absent (e.g. a child temporarily placed in foster care or a student temporarily away at college), may be considered a part of the applicant family's household if they are living or will live regularly with the family. [24 CFR §§912 and 960]

Live-in Aides may also be considered part of the applicant family's household. However, live-in aides are not considered family members and have no rights of tenancy or continued occupancy.

For purposes of continued occupancy: the term family also includes the remaining member of a resident family with the capacity, as defined by DC law, to execute a lease.

504 EQUAL ACCESS STATEMENT

For mobility impaired persons - a copy of this document is kept at our central office located at 906 East 5th Avenue which is an accessible facility on an accessible route. The document may be examined by individuals with disabilities Monday through Friday between the hours of 9:00 a.m. and 4:00 p.m. You must phone in to make arrangements to examine this document. Please call 421-4477. If you are hearing impaired use the TDD number given below.

For vision impaired person - the Authority will provide a staff person to assist a vision impaired person in reviewing this document. Assistance may include: describing the contents of the document, reading the document or sections of the document, or providing such other assistance as may be needed. Please call 421-4477.

For the hearing impaired - If any individual with a hearing impairment is interested in examining this document or has questions concerning this document please call 421-4962 (TDD) between the hours of 9:00 a.m. and 4:00 p.m. or come to our office located at 960 East 5th Avenue to make an appointment. The Authority will provide assistance to the hearing impaired that may include the provision of a sign language interpreter at a time convenient to both the Authority and the hearing impaired individual. (A sign language interpreter may be provided only if the individual cannot provide his/ her own interpreter.)

Assistance to ensure equal access to this document will be provided in a confidential manner and setting. The disabled individual is responsible for providing his/ her own transportation to an from the location where this document is kept.

If a handicapped or disabled individual is involved, hearings or meeting required by this document will be conducted in an accessible location. If necessary, the Authority will also provide appropriate assistance in the form of readers, translators, auxiliary aids, etc. The disabled individual is responsible for providing his/ her own transportation to an from the hearing or meeting location.

PROCEDURAL EXHIBITS TO CMHA ADMISSION & OCCUPANCY POLICY

Exhibit 1

Procedure on Waiting List Closure

CMHA will use the following method to determine whether the waiting list(s) may be partially or completely closed. CMHA may elect to close lists by program or by bedroom size.

1.00 How to Determine When the Waiting List May be Closed

- a. Staff will compute the average number of move ins per year over the past two years. The average number will be multiplied by 90% [24 CFR 960.211(b)(2)(ii)].
- b. The waiting list will then be examined to determine how many applicants there are already in the “top priority” category established by the CMHA Local and ranking Preference system for which applicants qualify.
- c. If the number of “top priority” applicants is less than 90% of the average number of move ins per year, the waiting list may not be closed.
- d. If the number of “top priority” applicants is equal to or greater than 90% of the average number of move ins per year, the waiting list may be closed. This determination is made because the average wait of a new applicant in the “top priority” category would be more than one year [7465.1 REV-1-2-3(3)].
- e. After the waiting list has been closed, at any time, if the number of applicants on the “top priority” category drops below 90% of the average number of move ins per year, CMHA will reopen the waiting list and begin to take new applications. CMHA may elect to accept applications only from individuals who qualify for the “top priority” category.
- f. When the waiting list is closed or has been reopened a sign will be placed in the lobby and an advertisement will be placed in the newspaper. The sign and ad will indicate which waiting lists are affected and what restrictions may apply for the program. Public service ads on local radio or TV stations will also be utilized to increase outreach to the visually impaired. Groups that work with the visual or hearing impaired may also be notified.

Exhibit 2

Procedure on Removing Applications from the Waiting List

1.00 Removing applicants from the Waiting List

Applicants may be removed from the Waiting List in two ways:

Withdrawal

Rejection

Applicants may be withdrawn at their request. No Informal Hearing is required following withdrawal, although CMHA must maintain files of withdrawn applications for three years or until the next HUD occupancy audit.

Applicants whose applications are rejected are entitled to an Informal hearing, if requested in a timely manner. The files of rejected applications will be held for three years or until the next HUD occupancy audit.

CMHA will remove an applicant from the waiting list for the following reasons:

- a. The applicant requests withdrawal.
- b. The applicant failed to advise CMHA of his/ her continued interest in public housing. CMHA requires applicants to notify the Authority of continued interest on an annual basis. This includes changes in family status, preference status, or mailing address. Applicants must sign and return the Interest Card that is mailed by CMHA to each applicant with an active folder. Failure to complete and return the card will result in withdrawal from the Waiting List.
- c. If CMHA has made reasonable efforts to contact the applicant to determine continued interest and is unsuccessful, correspondence to the latest reported address that has been returned from the Post Office will be acceptable documentation and considered a reasonable effort to contact the applicant. This will result in rejection of the application.
- d. CMHA will notify the applicant of it's intention to remove the applicant from the Waiting List.

- e. If the Authority has made reasonable efforts to contact the applicant to schedule necessary interviews necessary to complete the application process or obtain information necessary to process the application, and the applicant has failed to respond.
- f. If an applicant fails to keep any scheduled interview or appointment or fails to respond to the Authority concerning information that is necessary to process the application or to maintain the waiting list, the application will be withdrawn.
- g. The applicant fails to pay an outstanding balance owed to CMHA within the time specified in the Admission & Occupancy Policy and CMHA does not have a judgement against the applicant.
- h. If CMHA has a judgement against the applicant.
- i. The applicant fails to respond to an offer of housing or does not respond within the time provided.
- j. The applicant fails to meet eligibility requirements for the program.
- k. The applicant fails to pay an existing utility balance which results in a denial of new service by the utility supplier.
- l. The applicant has conducted falsification of an application, verification or any other information required by CMHA.
- m. Bad police report or landlord reference.

Exhibit 3.A.

1.00 Application Intake and Processing

The following brief description is provided to give Applicants and staff an outline of the steps required to process an application for admission to CMHA's public housing program. The actual waiting period for housing may vary according to each applicant's preferences (HUD 504) and the bedroom size the household requires.

Step 1 - Initial Application: Those who are gainfully employed may be interviewed. Those who are not gainfully employed may complete an application and be placed on our active waiting list.

Step 2 - Completion of Eligibility: This will be done by appointment only.

a) A full interview with a CMHA Application Specialist will be conducted by appointment only.

b) You will be notified in writing as to what is needed to complete your application and the time in which it must be received.

c) Once all information has been obtained and the application is complete, your name will be placed on the waiting list for housing according to the bedroom size that is needed.

d) If your application is denied, written notice will be sent to you explaining the reason for the denial, and also informing your of the right for an informal hearing to appeal CMHA's decision.

Step 3 - Offer of Housing:

a) When an applicant's name comes to the top of the waiting list, the applicant will be notified by letter. The applicant will have five (5) days from the date of the letter to contact CMHA regarding the unit offer.

* Failure to respond to the letter within the specified time will cause the applicant's name to be dropped from the waiting list.

** One refusal of housing will cause the applicant's name to be dropped to the bottom of the non-preference waiting list.

Step 4 - CMHA Unit Occupied

NOTE: Some sections of the Admission & Occupancy Policy are subject to the settlement agreement in West v. Bradley, attached as Exhibit 6 to this policy and should not be amended, deleted, supplemented or modified in any way absent compliance with Section 2 of that agreement.

Exhibit 3.B. - Procedure on Application Intake and Processing

1.01 General

The application process has many steps described in this procedure and the procedures on Verification, Informal Hearing for Rejected Applicants and Applicant Screening.

All communication with applicants will be by first class mail. Failure to respond to CMHA letter will result in rejection of the application and removal of the application from processing.

1.02 Accepting Applications

Applications may be accepted only for Waiting Lists that are open.

Applications for open Waiting Lists must be accepted from anyone who wishes to apply. Subsequent review will eliminate applications of families that do not qualify.

The application process is initiated by the filing of a preliminary application. A full application is completed only after a family moves up on the waiting list.

Each application must be completed and signed by the head of household and co-head (if applicable). CMHA representatives will be prepared to assist applicant who have difficulty completing the application. This assistance may be answering questions, helping applicants with literacy, vision or language needs. CMHA representative will, in general, make it possible for interested parties to submit an application for public housing.

1.03 Application Interview

The application process is initiated when the applicant reaches the top of the waiting list. If CMHA does not have an adequate number of applicants with Preferences, CMHA will interview applicants and collect information about the following:

1. Annual Income
2. Assets and Asset Income
3. Allowances
4. Local Preference(s)
5. Current and Prior Housing History
6. Family Composition
7. Police/ Arrest Record
8. Other

The application must be signed by ALL adult members of the household. Upon interview, the application process will be explained to the applicant(s).

1.04 Eligibility Verification

When the applicant is between 90 - 120 days from being offered a unit, eligibility will be verified using the Verification Procedures. A second interview to update family data will be held prior to move in. ALL PAPERWORK MUST BE DATED WITHIN 90 DAYS OF THE MOVE IN DATE. Annual income, allowances, family composition and Social Security Numbers will be verified. Any applicants found to be ineligible will be sent a rejection letter.

1.05 Applicant Screening

When an application is within 90 - 120 days of the top of the waiting list, or if CMHA does not have an adequate number of applicants on the Local Preference list, CMHA may initiate the applicant screening process according to the Applicant Screening Procedure.

1.06 Applicant Release of Information

All adult members of the household must sign appropriate releases at the application interview so that CMHA may obtain verifications necessary for Tenant Certification. Refusal to sign releases will be an automatic rejection of the application.

1.07 Eligibility and Preference Review

Once all information has been received by CMHA, a review of the applicant's file will take place to determine eligibility and qualification for a Local Preference. The applicant has 60 days to complete the application process. When the file review is complete, the applicant will be notified of the application status.

Eligible applicants will be placed on the Waiting List.

Ineligible applicants will be informed of their right to an Informal Hearing within thirty days of the date of the rejection letter. Rejected applications will be administratively filed with other rejected applications.

1.08 Verification of Local Preferences

Applicants who claim or appear to qualify for a Local Preference will be verified as soon as possible after the interview. Those claiming a Preference will be informed of their status via first class mail.

Applicants who do NOT qualify for a Preference will have ten days to request an informal hearing to present further evidence of the claimed preference. They will also be advised of their right to due process in a court of law if they feel the decision to deny a Preference was based upon illegal discrimination. Informal Hearings will be conducted by the Authority employee who denied the Local Preference or two CMHA employees designated by the Authority.

At the Informal Hearing, CMHA is under no obligation to justify or defend its definitions of the Preference Categories or the verification requirements relating to preferences. The Authority will justify the decision to award or deny the Preference only.

1.09 Re-verification of Local Preferences

If more than 90 days have elapsed since a Preference was verified, CMHA will re-verify the Preference(s). The applicant will be notified of any changes with respect to the Wait List position as it pertains to the Local Preference(s).

1.10 Waiting List Placement

Once the above steps are completed, the application will be placed on the Waiting List based on ranking (date and time of application) and Local Preferences. There is one Waiting List. Included in the Waiting List are sub-lists determining type of building needed (Elderly or Non-elderly) and size of unit (bedroom size).

1.11 Waiting List Update

At least once annually, CMHA will send Waiting List applicants a Continued Interest Letter with a required return response. If the client fails to express a continued interest in housing, their application will be withdrawn. Applicants have 30 days to return the Continued Interest Letter. This process is done for all housing programs administered by CMHA.

It is the responsibility of the applicant to inform CMHA of any change in address, telephone number, family size, income or circumstance that might affect eligibility, Wait List position, or communication from the Authority. For applicants without a permanent address (ie. homeless families) the address of a Social Service Agency may be used for CMHA contact.

If a letter to an applicant is returned to the Housing Authority because the applicant is no longer at the address to which it was mailed, the application will be withdrawn from the Waiting List.

1.13 Rent Calculation

When the application for admission has been approved, the Total Tenant Payment will be determined using the Federal formula: TTP = the greatest of 30% of adjusted income or 10% of gross income or Welfare Rent (if applicable).

If CMHA has Ceiling rents in effect, the rent will be the lower of the TTP or the Ceiling rent.

If CMHA has tenant paid utilities, the tenant rent will be the TTP or Ceiling Rent, reduced by the Allowance for Utilities applicable to the unit the applicant is renting (Low Rent program ONLY). Any utility reimbursements will be paid directly to the tenant by check.

1.14 Tenant Selection and Assignment Plan

Decisions for offers and assignments will be based on the type (Elderly v. Non-elderly, Accessible v. adaptable) and size of the unit needed and the Tenant Selection & Assignment Plan.

1.15 Showing the Unit

The applicant will be contacted telephone or letter to indicate that the application process has been completed, approved, and a unit is available to rent. CMHA representatives will coordinate the showing of units at a mutually convenient time for the client and development staff. Clients may see a unit prior to application approval, and this does not guarantee approval or offer of housing.

1.16 Applicant Acceptance or Rejection of Unit

After the applicant has seen the unit offered, he/ she must inform the Property in which the unit is situated of the acceptance or rejection of the unit on the first working day following the showing. Failure to respond promptly will be considered an automatic rejection of the unit.

If the applicant rejects an offer for housing, CMHA will determine if the reason for rejection is acceptable under the Tenant Selection & Assignment Plan, the applicant does not lose his / her place on the Waiting List and is offered another unit. Example: Presence of lead based paint if the applicant has children under age seven.

If the unit is rejected and the reason is not determined acceptable under the Tenant Selection & Assignment Plan, the application is moved to the bottom of the Waiting List and is assigned a new date and time of application - the date and time of the rejection.

1.17 Leasing of Units

If the applicant accepts the unit that is offered, Management staff will schedule the lease process at the first time convenient for both the applicant and the Management staff.

The move in inspection will be conducted by the on site manager and the new tenant. Both parties will sign the Move In Inspection Form, noting the exact condition of the unit.

The applicant will pay the security deposit, a pro-rated payment of the first month's rent and any other deposits that may be required (pet deposit in an elderly unit, key deposit, etc.). The lease will be signed and the keys to the unit issued. The applicant is now a tenant.

Exhibit 4. - Verification Procedure

1.01 What must be verified

All information relative to the following items must be verified as described in this exhibit and in accordance with the established Admission & Occupancy Procedures:

Eligibility for admission and continued occupancy:

- Income, assets, asset income
- Family composition
- Social Security Numbers
- Birth Certificates

Local Preferences, if any:

- Families earning less than 30% of median income as adjusted for family size
- Families earning 30% or more of the median income as adjusted for family size
- Veterans' status, disabled, and elderly

Allowances:

- Age, disability or handicap of family members
- Full time student status
- Child care costs
- Handicap expenses
- Medical costs for elderly families

Compliance with Applicant Selection Criteria:

- Documented ability and willingness to abide by CMHA lease requirements
- Previous history of tenancy, rent payment, caring for a home / apartment
- Criminal activity of any family member

Special Program Requirements:

- Special Needs Housing

All of the above information must be documented with the appropriate verification forms and placed in the applicant or tenant file.

1.02 Period of Verification

Only information that is verified within 90 days may be used for certification or recertification. Verified information obtained after application intake that is less than 90 days old does not need to be re-verified. Please note that 90 day verifications must be within 90 of the move in date or effective date of recertification.

1.03 Forms of Verification

Documentation of the verification process may include:

- Checklists completed in the interview, signed by the client
- Verification form completed and signed by third parties
- Reports of interviews
- Letters
- Notes of telephone conversations with reliable sources
- Tenant Certification

At a minimum, reports must indicate the date of the conversation, source of the information, name and job title of the individual contacted, and a written summary of the information received.

CMHA staff will be the final judge of the credibility of any verification submitted by an applicant or tenant. If staff considers documentation to be doubtful, it must be reviewed by the staff's supervisor who will make a determination. Staff will continue to pursue credible documentation until it is obtained or the client is rejected or evicted, whichever applies, for failing to produce the documentation required.

1.04 Attempted Fraud

Any information provided by the applicant or tenant that proved to be untrue may be used to disqualify the applicant for admission or continued occupancy on the basis of attempted fraud. CMHA considers false information about the income, assets, family composition, social security numbers, Local Preference(s), allowances, previous tenant history or criminal grounds for

rejecting an applicant or for eviction of a tenant. Unwitting errors that do not secure an advantage with regard to program eligibility, preferences, or rent will not be used as a basis for application rejection.

1.05 Sources of Information

- Information supplied by the client at interview or home visit
- Present and prior landlords or housing providers
- Present and prior employers
- Landlord record services
- Credit Check services
- Family social workers, parole officers, court records, accredited drug treatment centers, clinics, physicians
- Police departments

1.06 Verifications and Rent Computations

Annual income and adjusted income must be computed in accordance with the definitions and procedure established in Federal law and set forth in the Admission & Occupancy Policy.

1.07 Preferred forms of Verification

Verification of client information must be submitted in the following order:

- Third party written
- Third party oral with a record kept in the file
- Review of the documents provided by the household / family
- Affidavits from the family

Each file must be documented to show that CMHA staff diligently attempted to obtain third party written verifications before relying on a lessor acceptable form of verification.

1.08 Verification of Annual Income

Projections of annual income are based on the most accurate information with consideration of the current income rate, effective date, and include estimates for each income source in the household / family.

Irregular workers will be estimated on the basis of the most accurate information available, with consideration of earning ability and work history.

Overtime income is computed in accordance with verification obtained from the employer unless other verification obtained can be considered more reliable or accurate.

Exhibit 5 Applicant Screening Procedures

1.00 General Principles of Screening

CMHA will be the final judge of what constitutes adequate and credible documentation. If staff has doubts about the veracity or reliability of information received, they will pursue alternative methods until they are satisfied that their documentation is the best available - in accordance with 24 CFR HUD Regulations.

A distinction is made between verifications provided by landlords and information from other housing providers. Landlords have a relationship with applicants that is similar to that of which CMHA has with its residents compared to other housing providers such as friends, relatives, shelters, or institutions. Landlords are more likely to use leases that are comparable to Public Housing Leases compared to other housing providers. CMHA staff is prepared to explain to landlords and other housing providers the information used to determine whether or not the applicant is able to comply with lease requirements.

1.01 Applicant History Referral/ Inquiries

Suitability requires that the applicant and the members of the applicant's household, meet any

needs based requirements as established by CMHA and demonstrate through verifications that they: will pay the rent in full and timely, care for the unit, and will be good neighbors.

The two primary areas that are targeted are rental/ ownership history and recorded criminal records. The following is a basic explanation of what information is examined in an effort to determine suitability for housing.

RENTAL/ OWNERSHIP GUIDELINES

1. The applicant must provide CMHA the address(es) that they have resided for the past five (5) years.
2. A rental history is processed utilizing FABCO, an agency contracted to maintain rental records in the State of Ohio. If the resident has resided out of the State of Ohio, manual verification of the applicant's past performance may be conducted.
3. The FABCO report indicates: public records (ie. evictions, collections, judgements), detailed payment history, length of time at residences, problems experienced by current and prior landlords, report of pets, balances, damages, reported places of employment, other recent inquiries for the applicant's information.
4. If an eviction is reported within the past five years, the application will be withdrawn.
5. If a client moved owing damages and/ or a balance, a six (6) month, consecutive payment history must have been established or the application may be withdrawn.
6. If a client moved owing a balance to CMHA, the balance must be paid in full prior to application. **HOUSEHOLDS WHO APPLY FOR HOUSING WITH OUTSTANDING BALANCES OWED TO CMHA OR TO ANY HOUSING AUTHORITY PROGRAM MUST PAY THE BALANCE OWED IN FULL PRIOR TO BEING PLACED ON THE WAITING LIST. FAILURE TO PAY WILL RESULT IN THE APPLICANT BEING REJECTED. CMHA MAKES NO DISTINCTION BETWEEN AN OUTSTANDING BALANCE CARRIED AS A CURRENT RECEIVABLE AND AN OUTSTANDING BALANCE WHICH HAS BEEN WRITTEN OFF AS A COLLECTION LOSS.**
7. If the client was evicted for destroying property, disturbing the health, safety or quiet enjoyment of other residents the application will be withdrawn.
8. If the client abandoned a CMHA unit without notification that contributed to vandalism the application will be withdrawn.
9. If the client has falsified information in the application process the application may be withdrawn.
10. If the applicant initiates threats, acts in an abusive manner, or behaves in some other manner which indicates an intent to assault employees, other applicants, or residents of CMHA the application will be withdrawn.

POLICE REPORT GUIDELINES

1. Criminal activity of the part of any applicant family member involving crimes of physical violence to persons or property and other criminal acts including drug-related criminal activity with would adversely affect the health, safety, or welfare of other residents will be a valid reason for withdrawal of an application. CMHA reviews evidence that substantiates a history of criminal behavior through an arrest, conviction, and/ or probation period for crimes on the part of any applicant family member.

2. Any charges that may relate to the welfare of other residents including the applicant's family or charges that could affect the safety and quiet enjoyment of neighbors must have dispositions provided.
3. Applications will not be withdrawn for minor traffic violations, such as stop signs, jaywalking, etc...
4. Applications will be automatically withdrawn for any of the following convictions in the past five years:
 - Murder
 - Domestic Violence
 - Child Endangering
 - Assault
 - Arson
 - Drug Related
 - Petty Theft
 - Recurring OMVI
 - Recurring Prostitution
 - Resisting Arrest
 - Aggravated Threats / Menacing
5. For the following only, substantial involvement in a rehabilitation program for a minimum of six months in addition to successful completion of a rehabilitation program will be required to reconsider an application from withdrawal. CMHA will not house an applicant until the six month period has passed.
 - Petty Theft
 - OMVI
 - Prostitution
6. For the following only, substantial involvement in a rehabilitation program for an eighteen month period preceding application will be needed to reconsider and application from withdrawal.
 - Assault
 - Domestic Violence
 - Child Endangerment
 - Aggravated Burglary
7. Persons with convictions cannot be housed without substantiated evidence of active participation in an accredited and/ or recognized program relating to the particular offense within the first six months after conviction or release from incarceration.

FORMS OF VERIFICATION

- b. Third Party Verification - an agency or Authority (ie. Police Department) may be utilized to provide CMHA with information required. Other verifications (ie. landlords, parole officers, etc...) May be required.
- c. Reports of Interviews
- d. Letters
- e. Notes of telephone conversations with reliable sources The following are the methods by

which every applicant's performance relative to housing will be obtained:

If CMHA personnel has questions about information received, they may contact the housing provider to obtain reliable and credible documentation.

- a. CMHA may elect to utilize an agency to conduct applicant's history checks.
- b. CMHA may elect to conduct home visits prior to housing applicants.
- c. CMHA will check detoxification centers to determine whether applicants have substance abuse problems, and whether the applicant's behavior may violate the Housing Authority Lease, House Rules, disturb neighbors, destroy property, or pose a threat to the community including, but not limited to property and persons. Documentation of recent or current use of illegal drugs by an applicant family member will be sufficient grounds for rejection of the application.

1.02 Ability and willingness to comply with the terms of the CMHA lease.

1.03 An applicant's misrepresentation of any information related to eligibility, award of preference for admission, allowances, family composition or rent.

FALSIFICATION

2. If, during the course of processing an application, it becomes evident that an applicant has falsified or misrepresented any facts about his/ her current situation, history, or behavior in a manner that would affect eligibility, local preference, selection criteria, allowances or rent the application will be rejected.
3. This provision will not be applied to minor mistakes in fact that produce no benefit to the applicant

Exhibit 6 Procedure on Annual Reexamination

1.01 Annual Reexamination Effective Date

The effective date of a family's annual reexamination is the first day of the month in which they moved into the HA unit in which they are presently residing.

1.02 Initial Reexamination Notice

Ninety days prior to its effective date, each resident family will be sent an initial letter for reexamination. This letter will indicate the recertification requirement, schedule an appointment for interview, and advise the family what documents may be required at the time of the interview.

1.03 Failure to show for the Scheduled Interview

A second reexamination notice may be sent to the family to schedule a second appointment. If the adult residents fail to comply with the second scheduled appointment, the manager will be notified of such and the family household will be processed for eviction.

1.04 Interim Reviews

Interim Reviews must be scheduled through the Community Manager for processing. All changes that are claimed by the resident(s) must be documented by the resident at the scheduled interview time. If the resident fails to do so, the claim may be considered null and void by the HA.

Families who are granted an interim rent reduction due to zero income will be advised that they are required to report any increases in household income within ten days of the occurrence.

Families whose rent is adjusted to zero income will be placed on a sixty day reexamination schedule until their circumstances change.

Changes in family composition must be reported within ten days of the occurrence. Except for natural births, no additions to the household may be made without prior written approval of the CMHA.

1.05 Failure to Report Accurate Information

In instances where verified information show that families paid a lower rent than they should have, due to fraud, misrepresentation or concealment of relevant information, rent will be re-computed and will be retroactively charged for such periods. The family is required to pay the difference between what they paid and what they should have paid. This also includes reviews that are not completed on a timely basis. CMHA reserves the right to pursue evictions or other legal action in such instances, on a case by case basis.

ANNUAL STATEMENT/
PERFORMANCE AND EVALUATION REPORT
PART I: SUMMARY

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
Office of Public and Indian Housing

OMB Approval No. 2577-0157 (Exp. 07/31/98)
Appendix 6 - 1

COMPREHENSIVE GRANT PROGRAM (CGP)

2000 -- 709

NAME OF PHA: COLUMBUS METROPOLITAN HOUSING AUTHORITY, COLUMBUS, OHIO	Comprehensive Grant Number: 709	FFY of Grant Approval: 2000
---	------------------------------------	--------------------------------

(X) Original Annual Statement () Reserve for Disasters/Emergencies () Revised Annual Statement / Revision Number _#1_ () Performance and Evaluation Report for Program Year Ending
() Final Performance and Evaluation Report

LINE NO.	SUMMARY BY DEVELOPMENT ACCOUNT	Total Estimated Cost		Actual Cost (2)	
		Original	Revised (1)	Obligated	Expended
1	TOTAL NON-CGP FUNDS	\$0			
2	1406 OPERATIONS (May not exceed 10% of line 19)	\$300,667			
3	1408 MANAGEMENT IMPROVEMENTS *	\$850,000			
4	1410 ADMINISTRATION *	\$565,000			
5	1411 AUDIT *	\$5,000			
6	1415 LIQUIDATED DAMAGES *	\$0			
7	1430 FEES AND COSTS / CONSTRUCTION MANAGEMENT SERV *	\$500,000			
8	1440 SITE ACQUISTION *	\$0			
9	1450 SITE IMPROVEMENTS *	\$1,482,952			
10	1460 DWELLING STRUCTURES *	\$5,317,048			
11	1465.1 DWELLING EQUIPMENT-NONEXPENDABLE *	\$0			
12	1470 NONDWELLING STRUCTURES *	\$0			
13	1475 NONDWELLING EQUIPMENT *	\$0			
14	1485 DEMOLITION *	\$0			
15	1490 REPLACEMENT RESERVE *	\$0			
16	1495.1 RELOCATION COSTS *	\$0			
17	1498 MOD USED FOR DEVELOPMENT *	\$0			
18	1502 CONTEGENCY (MAY NOT EXCEED 8% OF LINE 19) *	0			
19	AMOUNT OF ANNUAL GRANT (SUM OF LINES 2-18) *	\$9,020,667			

20	AMOUNT OF LINE 19 RELATED TO LBP ACTIVITIES	*	\$120,000			
21	AMOUNT OF LINE 19 RELATED TO SECTION 504 COMPLIANCE	*	\$320,000			
22	AMOUNT OF LINE 19 RELATED TO SECURITY	*	\$1,100,000			
23	AMOUNT OF LINE 19 RELATED TO ENER. CONSERV. MEASURES	*	\$300,000			

Signature of Executive Director and Date:

Dennis S. Guest

Signature of Field Office Manager (Or regional Administrator in Co-Located offi

Date:

on Report.

9020667 TOTAL

8137459 APPROVED BUDGET

-883208

ice)

PART II: SUPPORTING PAGES

COMPREHENSIVE GRANT PROGRAM (CGP) 2000-7

OMB Approval No. 2577-0157 (exp. 7/31/98)

Development Name/No. Major Work Category	Account Number	TOTAL ESTIMATED COST			TOTAL ACTUAL COST		STATUS OF PROPOSED WORK 2
		Quantity Lumpsum	Original Cost	Revised Cost	Funds Obligated	Funds Expended	
OH16-001 POINDEXTER VILLAGE							
MANAGEMENT IMPROVEMENTS	1408						
Off-duty police			51316				
Security Gards							
Resident Specialist Family			7908				
Resident Specialist Senior							
Mental health liaison							
Resident Services Manager / Secretary			11285				
*Administration costs	1410		60117				
*Others: A/E fees & costs	1430						
*Site Improvement	1450		8032				
Repl./Upgr. Site Utilities							
Landscaping							
Site Lighting			140000				
Parking / Side Walks / Play Grounds							
*Dwelling Structure	1460						
Upgrade HVAC system							
Upgrade electrical syst.							
Upgrade plumbing syst.							
Upgrade build. interior							
Upgrade build. exterior							
Handicap compliance							
Upgrade Security System			12603				
*Dwelling Equipment	1465.1						
TOTAL PROJECT			291261				
OH16-002 LINCOLN PARK							
MANAGEMENT IMPROVEMENTS	1408						
Off-duty police			38673				
Security Gards							
Resident Specialist Family			5960				
Resident Specialist Senior							
Mental health liaison							
Resident Services Manager / Secretary			8505				
*Administration costs	1410		45306				
*Others: A/E fees & costs	1430		6014				
*Site Improvement	1450						
Repl./Upgr. Site Utilities							
Landscaping							
Site Lighting			110000				
Parking / Side Walks / Play Grounds							
*Dwelling Structure	1460						
Upgrade HVAC system							

Upgrade electrical syst.							
Upgrade plumbing syst.							
Upgrade build. interior							
Upgrade build. exterior							
Handicap compliance							
Upgrade Security System			4268				
*Dwelling Equipment	1460.1						
TOTAL PROJECT			218726				
Subtotal of estimated Cost			509987				

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		Quantity Lumpsum	Original Cost	Revised Cost	Funds Obligated	Funds Expended	
OH16-003 RIVERSIDE HOMES							
MANAGEMENT IMPROVEMENTS	1408						
Off-duty police			15866				
Security Gards							
Resident Specialist Family			2445				
Resident Specialist Senior							
Mental health liaison							
Resident Services Manager / Secretary			3489				
*Administration costs	1410		18587				
*Others: A/E fees & costs	1430		2483				
*Site Improvement	1450						
Repl./Upgr. Site Utilities							
Landscaping							
Site Lighting			45000				
Parking / Side Walks / Play Grounds							
*Dwelling Structure	1460						
Upgrade HVAC system							
Upgrade electrical syst.							
Upgrade plumbing syst.							
Upgrade build. interior							
Upgrade build. exterior							
Handicap compliance							
Upgrade Security System			2182				
*Dwelling Equipment	1460.1						
TOTAL PROJECT			90052				
OH16-006 SUNSHINE TERRACE							
MANAGEMENT IMPROVEMENTS	1408						
Off-duty police							
Security Gards			32676				
Resident Specialist Family							
Resident Specialist Senior			6490				
Mental health liaison			6612				
Resident Services Manager / Secretary			4907				
*Administration costs	1410		26138				
*Others: A/E fees & costs	1430		100000				
*Site Improvement	1450		20000				
Repl./Upgr. Site Utilities			20000				
Landscaping			20000				
Site Lighting			25000				
Parking / Side Walks / Play Grounds			25000				
*Dwelling Structure	1460						
Upgrade HVAC system			900000				

Upgrade electrical syst.			200000				
Upgrade plumbing syst.			100000				
Upgrade build. interior			200000				
Upgrade build. exterior			200000				
Handicap compliance			170000				
Upgrade Security System			20000				
*Dwelling Equipment							
	1460.1						
TOTAL PROJECT			2076823				
Subtotal of estimated Cost			2166875				

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		Quantity Lumpsum	Original Cost	Revised Cost	Funds Obligated	Funds Expended	
0816-010 SAWYER TOWERS							
MANAGEMENT IMPROVEMENTS	1408						
Off-duty police							
Security Gards			71161				
Resident Specialist Family							
Resident Specialist Senior			14133				
Mental health liaison			14399				
Resident Services Manager / Secretary			10685				
*Administration costs	1410		56923				
*Others: A/E fees & costs	1430		7605				
*Site Improvement	1450						
Repl./Upgr. Site Utilities							
Landscaping							
Site Lighting			100000				
Parking / Side Walks / Play Grounds							
*Dwelling Structure	1460						
Upgrade HVAC system							
Upgrade electrical syst.							
Upgrade plumbing syst.							
Upgrade build. interior							
Upgrade build. exterior							
Handicap compliance							
Upgrade Security System			44494				
*Dwelling Equipment	1460.1						
TOTAL PROJECT			319400				
0816-012 JENKINS TERRACE							
MANAGEMENT IMPROVEMENTS	1408						
Off-duty police							
Security Gards			35217				
Resident Specialist Family							

Resident Specialist Senior		6994			
Mental health liaison		7126			
Resident Services Manager / Secretary		5288			
*Administration costs	1410	28171			
*Others: A/E fees & costs	1430	3764			
*Site Improvement	1450				
Repl./Upgr. Site Utilities					
Landscaping					
Site Lighting		40000			
Parking / Side Walks / Play Grounds					
*Dwelling Structure	1460				
Upgrade HVAC system					
Upgrade electrical syst.					
Upgrade plumbing syst.					
Upgrade build. interior					
Upgrade build. exterior					
Handicap compliance					
Upgrade Security System		31510			
*Dwelling Equipment	1460.1				
TOTAL PROJECT		158070			
Subtotal of estimated Cost		477470			

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		Quantity Lumpsum	Original Cost	Revised Cost	Funds Obligated	Funds Expended	
<u>0HT0-014 WORLER TERRACE</u>							
MANAGEMENT IMPROVEMENTS	1408						
Off-duty police							
Security Gards			41026				
Resident Specialist Family							
Resident Specialist Senior			8148				
Mental health liaison			8302				
Resident Services Manager / Secretary			6161				
*Administration costs	1410		32818				
*Others: A/E fees & costs	1430		4384				
*Site Improvement	1450						
Repl./Upgr. Site Utilities							
Landscaping							
Site Lighting			50000				
Parking / Side Walks / Play Grounds							
*Dwelling Structure	1460						
Upgrade HVAC system							
Upgrade electrical syst.							
Upgrade plumbing syst.							
Upgrade build. interior							

Upgrade build. exterior							
Handicap compliance							
Upgrade Security System			33305				
*Dwelling Equipment	1460.1						
TOTAL PROJECT			184144				
<u>OPT16-015 SUNSHINE ANNEX</u>							
MANAGEMENT IMPROVEMENTS	1408						
Off-duty police							
Security Gards			23418				
Resident Specialist Family							
Resident Specialist Senior			4651				
Mental health liaison			4739				
Resident Services Manager / Secretary			3516				
*Administration costs	1410		112732				
*Others: A/E fees & costs	1430		70000				
*Site Improvement	1450						
Repl./Upgr. Site Utilities			50000				
Landscaping			20000				
Site Lighting			20000				
Parking / Side Walks / Play Grounds			10000				
*Dwelling Structure	1460						
Upgrade HVAC system			700000				
Upgrade electrical syst.			50000				
Upgrade plumbing syst.			50000				
Upgrade build. interior			100000				
Upgrade build. exterior			100000				
Handicap compliance			150000				
Upgrade Security System			23053				
*Dwelling Equipment	1460.1						
		1343053.00					
TOTAL PROJECT			1492109				
Subtotal of estimated Cost			1676253				

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		Quantity Lumpsum	Original Cost	Revised Cost	Funds Obligated	Funds Expended	
UHT6-020 MARION SQUARE							
MANAGEMENT IMPROVEMENTS	1408						
Off-duty police			32227				
Security Gards			47199				
Resident Specialist Family			4967				
Resident Specialist Senior			9374				
Mental health liaison			9551				
Resident Services Manager / Secretary			7087				
*Administration costs	1410		37755				
*Others: A/E fees & costs	1430		5044				
*Site Improvement	1450						
Repl./Upgr. Site Utilities							
Landscaping							
Site Lighting			80000				
Parking / Side Walks / Play Grounds							
*Dwelling Structure	1460						
Upgrade HVAC system							
Upgrade electrical syst.							
Upgrade plumbing syst.							
Upgrade build. interior							
Upgrade build. exterior							
Handicap compliance							
Upgrade Security System			15838				
*Dwelling Equipment	1460.1						
TOTAL PROJECT			249042				
UHT6-033 KENMORE SQUARE							
MANAGEMENT IMPROVEMENTS	1408						
Off-duty police			6941				
Security Gards							
Resident Specialist Family			1070				
Resident Specialist Senior							
Mental health liaison							
Resident Services Manager / Secretary			1526				
*Administration costs	1410		8132				
*Others: A/E fees & costs	1430		1086				
*Site Improvement	1450						
Repl./Upgr. Site Utilities							
Landscaping							
Site Lighting			15000				
Parking / Side Walks / Play Grounds							
*Dwelling Structure	1460						
Upgrade HVAC system							

Upgrade electrical syst.							
Upgrade plumbing syst.							
Upgrade build. interior							
Upgrade build. exterior							
Handicap compliance							
Upgrade Security System				5642			
*Dwelling Equipment	1460.1						
TOTAL PROJECT				39397			
Subtotal of estimated Cost				288439			

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Development Name/No. Major Work Category	Account Number	TOTAL ESTIMATED COST			TOTAL ACTUAL COST		STATUS OF PROPOSED WORK 2
		Quantity Lumpsum	Original Cost	Revised Cost	Funds Obligated	Funds Expended	
UHT6-039 POST OAK STATION I							
MANAGEMENT IMPROVEMENTS							
Off-duty police			9172				
Security Gards							
Resident Specialist Family			1414				
Resident Specialist Senior							
Mental health liaison							
Resident Services Manager / Secretary			2017				
*Administration costs	1410		10746				
*Others: A/E fees & costs	1430		1436				
*Site Improvement	1450						
Repl./Upgr. Site Utilities							
Landscaping							
Site Lighting			22000				
Parking / Side Walks / Play Grounds							
*Dwelling Structure	1460						
Upgrade HVAC system							
Upgrade electrical syst.							
Upgrade plumbing syst.							
Upgrade build. interior							
Upgrade build. exterior							
Handicap compliance							
Upgrade Security System			5277				
*Dwelling Equipment	1460.1						
TOTAL PROJECT			52062				
UHT6-040 POST OAK STATION II							
MANAGEMENT IMPROVEMENTS							
Off-duty police			9668				
Security Gards							
Resident Specialist Family			1490				
Resident Specialist Senior							

Mental health liaison							
Resident Services Manager / Secretary			2126				
*Administration costs	1410		11326				
*Others: A/E fees & costs	1430		1513				
*Site Improvement	1450						
Repl./Upgr. Site Utilities							
Landscaping							
Site Lighting			25000				
Parking / Side Walks / Play Grounds							
*Dwelling Structure	1460						
Upgrade HVAC system							
Upgrade electrical syst.							
Upgrade plumbing syst.							
Upgrade build. interior							
Upgrade build. exterior							
Handicap compliance							
Upgrade Security System			3751				
*Dwelling Equipment	1460.1						
TOTAL PROJECT			54874				
Subtotal of estimated Cost			106936				

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Development Name/No. Major Work Category	Account Number	TOTAL ESTIMATED COST			TOTAL ACTUAL COST		STATUS OF PROPOSED WORK 2
		Quantity Lumpsum	Original Cost	Revised Cost	Funds Obligated	Funds Expended	
<u>ORT6-037/ GLENVIEW ESTATE</u>							
MANAGEMENT IMPROVEMENTS	1408						
Off-duty police			6198				
Security Gards							
Resident Specialist Family			955				
Resident Specialist Senior							
Mental health liaison							
Resident Services Manager / Secretary			1363				
*Administration costs	1410		7261				
*Others: A/E fees & costs	1430		970				
*Site Improvement	1450						
Repl./Upgr. Site Utilities							
Landscaping							
Site Lighting			15000				
Parking / Side Walks / Play Grounds							
*Dwelling Structure	1460						
Upgrade HVAC system							
Upgrade electrical syst.							
Upgrade plumbing syst.							
Upgrade build. interior							
Upgrade build. exterior							

Handicap compliance							
Upgrade Security System			3430				
*Dwelling Equipment	1460.1						
TOTAL PROJECT			35177				
UHT6-038 MAPLEWOOD HEIGHTS							
MANAGEMENT IMPROVEMENTS	1408						
Off-duty police							
Security Gards			12889				
Resident Specialist Family							
Resident Specialist Senior			2560				
Mental health liaison			2608				
Resident Services Manager / Secretary			1935				
*Administration costs	1410		10310				
*Others: A/E fees & costs	1430		1377				
*Site Improvement	1450						
Repl./Upgr. Site Utilities							
Landscaping							
Site Lighting			21000				
Parking / Side Walks / Play Grounds							
*Dwelling Structure	1560						
Upgrade HVAC system							
Upgrade electrical syst.							
Upgrade plumbing syst.							
Upgrade build. interior							
Upgrade build. exterior							
Handicap compliance							
Upgrade Security System			5171				
*Dwelling Equipment	1560.1						
TOTAL PROJECT			57850				
Subtotal of estimated Cost			93027				

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Development Name/No. Major Work Category	Account Number	TOTAL ESTIMATED COST			TOTAL ACTUAL COST		STATUS OF PROPOSED WORK 2
		Quantity Lumpsum	Original Cost	Revised Cost	Funds Obligated	Funds Expended	
<u>0HT6-039 BOLLINGER TOWER</u>							
MANAGEMENT IMPROVEMENTS	1408						
Off-duty police							
Security Gards			18153				
Resident Specialist Family							
Resident Specialist Senior			3605				
Mental health liaison			3673				
Resident Services Manager / Secretary			2726				
*Administration costs	1410		14521				
*Others: A/E fees & costs	1430		160801				
*Site Improvement	1450						
Repl./Upgr. Site Utilities							
Landscaping							
Site Lighting			15000				
Parking / Side Walks / Play Grounds							
*Dwelling Structure	1460						
Upgrade HVAC system			1041139				
Upgrade electrical syst.							
Upgrade plumbing syst.							
Upgrade build. interior							
Upgrade build. exterior							
Handicap compliance							
Upgrade Security System			21861				
*Dwelling Equipment	1460,1						
TOTAL PROJECT			1281479				
<u>0HT6-040 EASTMOOR SQUARE</u>							
MANAGEMENT IMPROVEMENTS	1408						
Off-duty police			6569				
Security Gards							
Resident Specialist Family			1012				
Resident Specialist Senior							
Mental health liaison							
Resident Services Manager / Secretary			1445				
*Administration costs	1410		7696				
*Others: A/E fees & costs	1430		1028				
*Site Improvement	1450						
Repl./Upgr. Site Utilities							
Landscaping							
Site Lighting			10000				
Parking / Side Walks / Play Grounds							
*Dwelling Structure	1460						
Upgrade HVAC system							

Upgrade electrical syst.							
Upgrade plumbing syst.							
Upgrade build. interior							
Upgrade build. exterior							
Handicap compliance							
Upgrade Security System				9536			
*Dwelling Equipment	1460.1						
TOTAL PROJECT				37286			
Subtotal of estimated Cost				1318765			

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		Quantity Lumpsum	Original Cost	Revised Cost	Funds Obligated	Funds Expended	
<u>0HT6-041 REEB HUSACK</u>							
MANAGEMENT IMPROVEMENTS							
Off-duty police			3347				
Security Gards							
Resident Specialist Family			516				
Resident Specialist Senior							
Mental health liaison							
Resident Services Manager / Secretary			736				
*Administration costs	1410		3921				
*Others: A/E fees & costs	1430		524				
*Site Improvement	1450						
Repl./Upgr. Site Utilities							
Landscaping							
Site Lighting			9952				
Parking / Side Walks / Play Grounds							
*Dwelling Structure	1460						
Upgrade HVAC system							
Upgrade electrical syst.							
Upgrade plumbing syst.							
Upgrade build. interior							
Upgrade build. exterior							
Handicap compliance							
Upgrade Security System							
*Dwelling Equipment	1460.1						
TOTAL PROJECT			18996				
<u>0HT6-042 CANONBY COURT</u>							
MANAGEMENT IMPROVEMENTS							
Off-duty police			6198				
Security Gards							
Resident Specialist Family			955				
Resident Specialist Senior							

Mental health liaison							
Resident Services Manager / Secretary			1363				
*Administration costs	1410		7261				
*Others: A/E fees & costs	1430		970				
*Site Improvement	1450						
Repl./Upgr. Site Utilities							
Landscaping							
Site Lighting			10000				
Parking / Side Walks / Play Grounds							
*Dwelling Structure	1460						
Upgrade HVAC system							
Upgrade electrical syst.							
Upgrade plumbing syst.							
Upgrade build. interior							
Upgrade build. exterior							
Handicap compliance							
Upgrade Security System			8430				
*Dwelling Equipment	1460.1						
TOTAL PROJECT			35177				
Subtotal of estimated Cost			54173				

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		Quantity Lumpsum	Original Cost	Revised Cost	Funds Obligated	Funds Expended	
<u>ORT6-043 THORNWOOD COMMONS</u>							
MANAGEMENT IMPROVEMENTS	1408						
Off-duty police			10660				
Security Gards							
Resident Specialist Family			1643				
Resident Specialist Senior							
Mental health liaison							
Resident Services Manager / Secretary			2344				
*Administration costs	1410		12488				
*Others: A/E fees & costs	1430		1668				
*Site Improvement	1450						
Repl./Upgr. Site Utilities							
Landscaping							
Site Lighting			25000				
Parking / Side Walks / Play Grounds							
*Dwelling Structure	1460						
Upgrade HVAC system							
Upgrade electrical syst.							
Upgrade plumbing syst.							
Upgrade build. interior							
Upgrade build. exterior							

Handicap compliance							
Upgrade Security System			6700				
*Dwelling Equipment	1460.1						
TOTAL PROJECT			60503				
<hr/>							
<u>0816-044 TRIVETT HEIGHT</u>							
MANAGEMENT IMPROVEMENTS	1408						
Off-duty police			16981				
Security Gards							
Resident Specialist Family			2617				
Resident Specialist Senior							
Mental health liaison							
Resident Services Manager / Secretary			3734				
*Administration costs	1410		19894				
*Others: A/E fees & costs	1430		2660				
*Site Improvement	1450						
Repl./Upgr. Site Utilities							
Landscaping							
Site Lighting			40000				
Parking / Side Walks / Play Grounds							
*Dwelling Structure	1460						
Upgrade HVAC system							
Upgrade electrical syst.							
Upgrade plumbing syst.							
Upgrade build. interior							
Upgrade build. exterior							
Handicap compliance							
Upgrade Security System			10499				
*Dwelling Equipment	1460.1						
TOTAL PROJECT			96385				
Subtotal of estimated Cost			156888				

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		Quantity Lumpsum	Original Cost	Revised Cost	Funds Obligated	Funds Expended	
UHT6-200 CMHA NEW OFFICE BUILDING							
MANAGEMENT IMPROVEMENTS	1408						
Off-duty police							
Security Gards							
Resident Specialist Family							
Resident Specialist Senior							
Mental health liaison							
Resident Services Manager / Secretary							
*Administration costs	1410		0				
*Others: A/E fees & costs	1430						
*Site Improvement	1450						
Site Utilities							
Landscaping							
Parking / Side Walks							
*Dwelling Structure	1460						
HVAC system							
Electrical syst.							
Plumbing system							
Building interior							
Building exterior			507000				
Handicap compliance							
Security System							
*Dwelling Equipment	1460.1						
TOTAL PROJECT			507000				
UHT6-201 CMHA NEW MAINTENANCE BUILDING							
MANAGEMENT IMPROVEMENTS	1408						
Off-duty police							
Security Gards							
Resident Specialist Family							
Resident Specialist Senior							
Mental health liaison							
Resident Services Manager / Secretary							
*Administration costs	1410		0				
*Others: A/E fees & costs	1430		200000				
*Site Improvement	1450						
Site Utilities			300000				
Landscaping							
Parking / Side Walks			200000				
*Administration costs	1460						
HVAC system							
Electrical syst.							
Plumbing system							

Building interior							
Building exterior							
Handicap compliance							
Security System							
*Dwelling Equipment	1460.1						
TOTAL PROJECT				700000			
Subtotal of estimated Cost				1207000			

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COMPREHENSIVE GRANT PROGRAM (CGP) 2000-7

OMB Approval No. 2577-0157 (exp. 7/31/98)

Development Name/No. Major Work Category	Account Number	TOTAL ESTIMATED COST			TOTAL ACTUAL COST		STATUS OF PROPOSED WORK 2
		Quantity Lumpsum	Original Cost	Revised Cost	Funds Obligated	Funds Expended	
<u>CONSTRUCTION MANAGEMENT SERVICES</u>			500000				
<u>09T6-202 NEW CONSTRUCTION</u>							
<u>MANAGEMENT IMPROVEMENTS</u>	1408						
Off-duty police							
Security Gards							
Resident Specialist Family							
Resident Specialist Senior							
Mental health liaison							
Resident Services Manager / Secretary							
*Administration costs	1410						
*Others: A/E fees & costs	1430		12845				
*Site Improvement	1450						
Site Utilities							
Landscaping							
Parking / Side Walks							
*Dwelling Structure	1460						
HVAC system							
Electrical syst.							
Plumbing system							
Building interior							
Building exterior							
Handicap compliance							
Security System							
*Dwelling Equipment	1460.1						
TOTAL PROJECT			12845				
Subtotal of estimated Cost				512845			
<u>09T6-013 TAYLOR TERRACE</u>							
<u>MANAGEMENT IMPROVEMENTS</u>	1408						
Off-duty police							
Security Gards			47380				

Resident Specialist Family							
Resident Specialist Senior			11466				
Mental health liaison			9587				
Resident Services Manager / Secretary			7115				
*Administration costs			37897				
TOTAL PROJECT			113445				
GRAND TOTALS			8720000				

PAGE : 12 OF 12

FORM HUD-52837

NAS

(Admin / A&E / Site Improv. 8720000
 Dwelling Struct. / Dwell. Equip. &
 Construction Management C.M.)

Management Improvements 0

Operating Deficit 300667

Non Dwelling 0

Replacement Reserve 0

Non CGP Funds 0

 Grand Application Total 9020667
 =====

HUD Approved Fund 7500000

 Error -1520667

ANNUAL STATEMENT/
 PERFORMANCE AND EVALUATION REPORT
 PART III: IMPLEMENTATION SCHEDULE
 COMPREHENSIVE GRANT PROGRAM

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
 Office of Public and Indian Housing

(CGP) 709 -- 2000

Development Number/Name HA-Wide Activities	All Funds Obligated (Quarter Ending Date)			All Funds Expended (Quarter Ending Date)		
	Original	Revised 1	Actual 2	Original	Revised 1	Actual 2
Poindexter Village OH16 - 001	9/30/2002			9 / 30 / 2004		
Lincoln Park OH16 - 002 / 9	9/30/2002			9 / 30 / 2004		
Riverside Homes OH16 - 003	9/30/2002			9 / 30 / 2004		
Sunshine Terrace OH16 - 006	9/30/2002			9 / 30 / 2004		
Sawyer Towers OH16 - 010	9/30/2002			9 / 30 / 2004		
Jenkins Terrace OH16 - 012	9/30/2002			9 / 30 / 2004		
Worley Terrace OH16 - 014	9/30/2002			9 / 30 / 2004		
Sunshine Annex OH16 - 015	9/30/2002			9 / 30 / 2004		
Marion Square OH16 - 020	9/30/2002			9 / 30 / 2004		
Kenmore Square OH16 - 033	9/30/2002			9 / 30 / 2004		
Post Oak Station OH16 - 033 / 46	9/30/2002			9 / 30 / 2004		
Glenview Estate OH16 - 0037	9/30/2002			9 / 30 / 2004		
Maplewood Heights OH16 - 038	9/30/2002			9 / 30 / 2004		
Bollenger Towers OH16 - 039	9/30/2002			9 / 30 / 2004		
Eastmoor Square OH16 - 040	9/30/2002			9 / 30 / 2004		
Reeb Hosack OH16 - 041	9/30/2002			9 / 30 / 2004		
Canonby Couert OH16 - 042	9/30/2002			9 / 30 / 2004		
Thornwood Commons OH16 - 043	9/30/2002			9 / 30 / 2004		
Trivett Heights OH16 - 044	9/30/2002			9 / 30 / 2004		
CMHA New Office Building	9/30/2002			9 / 30 / 2004		
CMHA New Maintenance Bldg.	9/30/2002			9 / 30 / 2004		

New Construction Projects	9/30/2002			9 / 30 / 2004		
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Signature of Excecutive Director & Date:
 Dennis S. Guest

Signature of Public Housing Director/Office of Nativ

*3/ To be completed at the end of the program year.

T

OMB No. 2577-0157 (Exp. 07/31/98)

Reasons for Revised Target Dates 2

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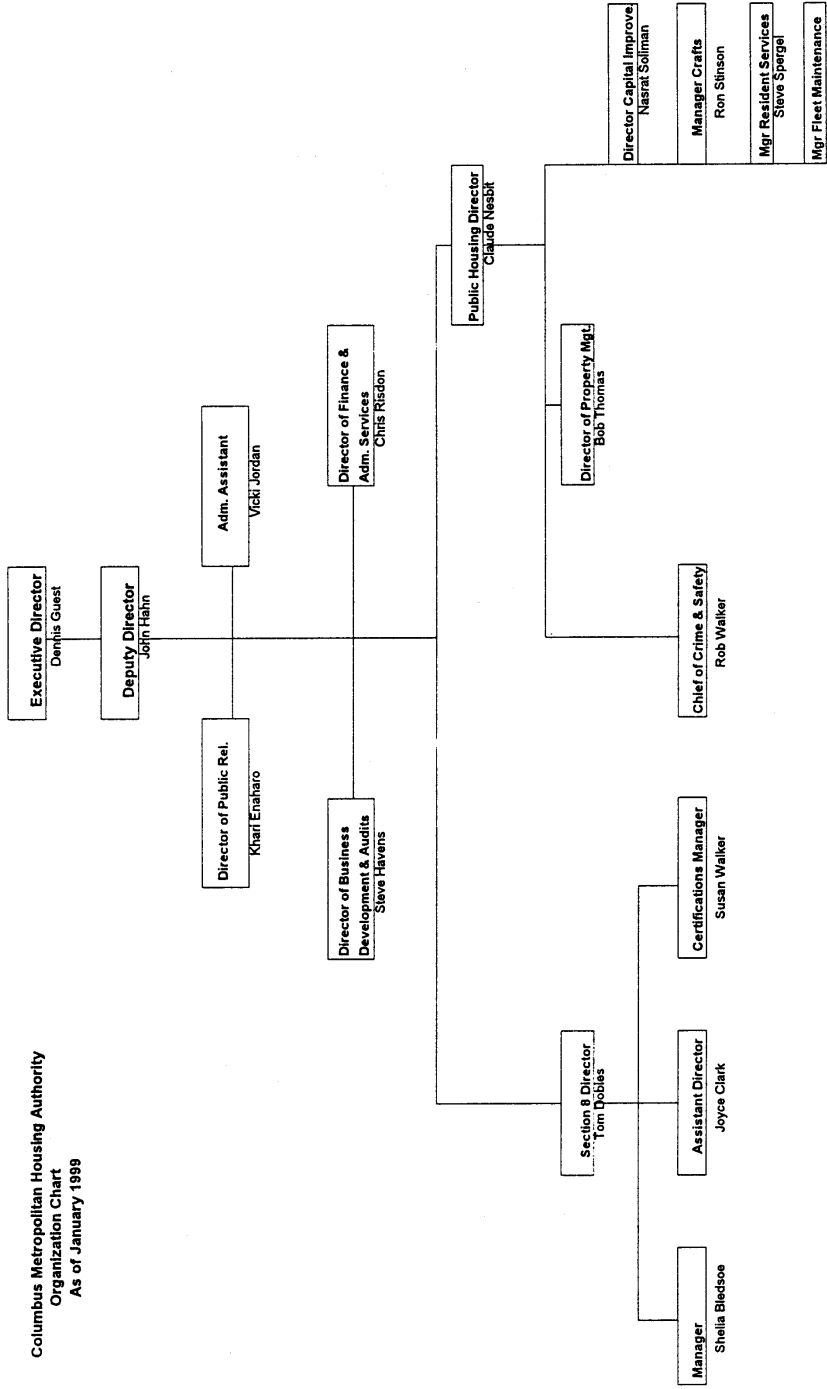
re American Programs Administrator & Date:

FORM HUD-52837

NAS

Attachment C

Columbus Metropolitan Housing Authority
 Organization Chart
 As of January 1999



Number of employees 266

**FIVE-YEAR ACTION PLAN
PART I: SUMMARY
COMPREHENSIVE GRANT PROGRAM (CGP) 709 - 2000**

**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
Office of Public and Indian Housing**

OMB Approval No. 2577 -

NAME OF PHA/IHA: COLUMBUS METROPOLITAN HOUSING AUTHORITY		Locality (City / County / State) Columbus, Franklin, Ohio		----X---- Original ----- Revision Nc
A	Development Number/Name/	Work Statement Year 2: FFY2000	Work Statement Year 3: FFY2001	Work Statement Year 4: FFY2002
1	OH16-001 Poindexter Village	160634.9206	388736.5079	0
2	OH16-002 Lincoln Park	120282.1869	291082.8924	0
3	OH16-003 Riverside Homes	49664.903	120189.0653	77336.94181
4	OH16-004 Sullivant Garden	0	0	0
5	OH16-006 Sunshine Terrace	200000	0	0
6	OH16-009 Sullivant Garden	0	0	0
7	OH16-010 Sawyer Towers	152098.7654	368079.0123	0
8	OH16-012 Jenkins Terrace	75273.36861	182161.552	100000
9	OH16-013 Taylor Terrace	0	0	0
10	OH16-014 Worley Terrace	87689.59436	212208.8183	0
11	OH16-015 Sunshine Annex	1343053	121128.0423	100000
12	OH16-020 Marion Square	100881.8342	244134.0388	0
13	OH16-033 Kenmore Square	21728.39506	52582.71605	33834.91204
14	OH16-035 Post Oak Station I	28712.52205	69484.30335	44710.41949
15	OH16-037 Glenview Estate	19400.35273	46948.85362	30209.7429
16	OH16-038 Maplewood Heights	27548.50088	66667.37213	0
17	OH16-039 Bollinger Tower	1238801	93897.70723	0
18	OH16-040 Eastmoor Square	20564.3739	49765.78483	32022.32747
19	OH16-041 Reeb-Hosack	10476.19048	25352.38095	16313.26116
20	OH16-042 Canonby Court	19400.35273	46948.85362	30209.7429
21	OH16-043 Thornwood Commons	33368.6067	80752.02822	51960.75778
22	OH16-044 Trivett Height	53156.96649	128639.8589	82774.69553
23	OH16-046 Post Oak Station II	30264.55026	73240.21164	47127.19892
24	OH16-200 CMHA New Office Buildir	507000	0	0
25	OH16-201 CMHA New Maintenance Building	700000	2300000	0
26	OH16-202 New Construction	0	0	2446500
B	Physical Improvements Subtotal:	6800000.384	4962000	4893000
C	Management Improvements:	850000	784000	819000
D	PHA-wide Non dwelling Structures & Equipment:	0	0	0
E	Administration:	570000	490000	512000
F	Other: (A/E, C.M. , Relocation, Auditing)	500000	500000	500000
G	Operations	300667	264000	276000
H	Demolition:	0	0	0
I	Replacement Reserve:	0	0	0

J	Mod Used for Development:	0	0	0
K	Total CGP Funds:	9020667.384	7000000	7000000
L	Total Non- CGP Funds:	0		
M	GRAND TOTAL	\$9,020,667	\$7,000,000	\$7,000,000
Signature of Executive Director:		Signature of Public Housing Director & Date		
Dennis S. Guest				

FORM HUD-52834 (1/31/92) REF: Handboob

0157 (Exp. 7/31/98)

Work Statement Year 5: FFY 2003	Work Statement Year 5: FFY 2004
0	0
0	0
77336.94181	0
0	0
0	0
0	0
0	0
0	0
1000000	1000000
0	0
1000000	2000000
0	0
0	0
33834.91204	0
44710.41949	0
30209.7429	0
0	0
0	0
32022.32747	0
16313.26116	0
30209.7429	0
51960.75778	0
82774.69553	0
47127.19892	0
0	0
0	0
2446500	1893000
4893000	4893000
819000	819000
0	0
512000	512000
500000	500000
276000	276000
0	0
0	0

N

0	0
7000000	7000000
\$7,000,000	\$7,000,000

Handbook 7485.3

NAS

YR. 2000 : Security & Lighting cost distribution

# UNITS	BUDG./PROJ.	T. BUDGET	T. # UNITS	A/E FEE	Const Cost
414.00	160634.9206	1100000	2835.00	8031.74603	152603.175
310.00	120282.1869	1100000	2835.00	6014.10935	114268.078
128.00	49664.903	1100000	2835.00	2483.24515	47181.6578
0.00	0	1100000	2835.00	0	0
0.00	0	1100000	2835.00	0	0
0.00	0	1100000	2835.00	0	0
392.00	152098.7654	1100000	2835.00	7604.93827	144493.827
194.00	75273.36861	1100000	2835.00	3763.66843	71509.7002
0.00	0	1100000	2835.00	0	0
226.00	87689.59436	1100000	2835.00	4384.47972	83305.1146
129.00	50052.91005	1100000	2835.00	2502.6455	47550.2646
260.00	100881.8342	1100000	2835.00	5044.09171	95837.7425
56.00	21728.39506	1100000	2835.00	1086.41975	20641.9753
74.00	28712.52205	1100000	2835.00	1435.6261	27276.8959
50.00	19400.35273	1100000	2835.00	970.017637	18430.3351
71.00	27548.50088	1100000	2835.00	1377.42504	26171.0758
100.00	38800.70547	1100000	2835.00	1940.03527	36860.6702
53.00	20564.3739	1100000	2835.00	1028.21869	19536.1552
27.00	10476.19048	1100000	2835.00	523.809524	9952.38095
50.00	19400.35273	1100000	2835.00	970.017637	18430.3351
86.00	33368.6067	1100000	2835.00	1668.43034	31700.1764
137.00	53156.96649	1100000	2835.00	2657.84832	50499.1182
78.00	30264.55026	1100000	2835.00	1513.22751	28751.3228
2835.00	1100000			55000	1045000 1100000

YR. 2001 : GEN. IMP. BUDG. DIST.

BUDG./PROJ.	T. BUDGET	T. # UNITS	A/E FEE	Const Cost
388736.5079	2662000	2835.00	19436.8254	369299.683
291082.8924	2662000	2835.00	14554.1446	276528.748
120189.0653	2662000	2835.00	6009.45326	114179.612
0	2662000	2835.00	0	0
0	2662000	2835.00	0	0
0	2662000	2835.00	0	0
368079.0123	2662000	2835.00	18403.9506	349675.062
182161.552	2662000	2835.00	9108.0776	173053.474
0	2662000	2835.00	0	0
212208.8183	2662000	2835.00	10610.4409	201598.377
121128.0423	2662000	2835.00	6056.40212	115071.64
244134.0388	2662000	2835.00	12206.7019	231927.337
52582.71605	2662000	2835.00	2629.1358	49953.5802
69484.30335	2662000	2835.00	3474.21517	66010.0882
46948.85362	2662000	2835.00	2347.44268	44601.4109
66667.37213	2662000	2835.00	3333.36861	63334.0035
93897.70723	2662000	2835.00	4694.88536	89202.8219
49765.78483	2662000	2835.00	2488.28924	47277.4956
25352.38095	2662000	2835.00	1267.61905	24084.7619
46948.85362	2662000	2835.00	2347.44268	44601.4109
80752.02822	2662000	2835.00	4037.60141	76714.4268
128639.8589	2662000	2835.00	6431.99295	122207.866
73240.21164	2662000	2835.00	3662.01058	69578.2011
2662000			133100	2528900 2662000

YR. 2002 & 2003 : GEN. IMP. BUDG. DIST.

N

# UNITS	BUDG. / PROJ.	T. BUDGET	T. # UNITS	A/E FEE	Const Cost
0.00	0	446500	739.00	0	0
0.00	0	446500	739.00	0	0
128.00	77336.94181	446500	739.00	3866.847091	73470.09472
0.00	0	446500	739.00	0	0
0.00	0	446500	739.00	0	0
0.00	0	446500	739.00	0	0
0.00	0	446500	739.00	0	0
0.00	0	446500	739.00	0	0
0.00	0	446500	739.00	0	0
0.00	0	446500	739.00	0	0
0.00	0	446500	739.00	0	0
0.00	0	446500	739.00	0	0
0.00	0	446500	739.00	0	0
56.00	33834.91204	446500	739.00	1691.745602	32143.16644
74.00	44710.41949	446500	739.00	2235.520974	42474.89851
50.00	30209.7429	446500	739.00	1510.487145	28699.25575
0.00	0	446500	739.00	0	0
0.00	0	446500	739.00	0	0
53.00	32022.32747	446500	739.00	1601.116373	30421.2111
27.00	16313.26116	446500	739.00	815.6630582	15497.59811
50.00	30209.7429	446500	739.00	1510.487145	28699.25575
86.00	51960.75778	446500	739.00	2598.037889	49362.71989
137.00	82774.69553	446500	739.00	4138.734777	78635.96076
78.00	47127.19892	446500	739.00	2356.359946	44770.83897
739.00	446500			22325	424175
					446500

COMPREHENSIVE GRANT PROGRAM (CGP)2000-70

OMB Approval No. 2577-0157 (exp. 7/31/98)

Development Name/No. Major Work Category	year 1 : 2000		year 2 : 2001		year 3 : 2002		year 4 : 2003		year 5 : 2004	
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost
OH16-001 POINDEXTER VILLAGE										
*Administration costs		60117		61885		64664		64664		64664
*Others: A/E fees & costs				19437		0		0		0
*Site Improvement		8032								
Repl./Upgr. Site Utilities				25000						
Landscaping				50000						
Site Lighting		140000								
Parking / Side Walks / Play Grounds				70000						
*Dwelling Structure										
Upgrade HVAC system				20000						
Upgrade electrical syst.				50000						
Upgrade plumbing syst.				34000						
Upgrade build. interior				50000						
Upgrade build. exterior				50000						
Handicap compliance				20000						
Upgrade Security System		12603								
*Dwelling Equipment										
TOTAL PROJECT		220752		450322		64664		64664		64664
OH16-002 LINCOLN PARK										
*Administration costs		45306		46638		48732		48732		48732
*Others: A/E fees & costs		6014		14554		0		0		0
*Site Improvement										
Repl./Upgr. Site Utilities				50000						
Landscaping				20000						
Site Lighting		110000								
Parking / Side Walks / Play Grounds				20000						
*Dwelling Structure										
Upgrade HVAC system										
Upgrade electrical syst.				20000						
Upgrade plumbing syst.				20000						
Upgrade build. interior				100000						
Upgrade build. exterior				36529						
Handicap compliance				10000						
Upgrade Security System		4268								
*Dwelling Equipment										
TOTAL PROJECT		165588		337721		48732		48732		48732
Subtotal of estimated Cost		386340		788043		113396		113396		113396

Development Name/No. Major Work Category	year 1 : 2000		year 2 : 2001		year 3 : 2002		year 4 : 2003		year 5 : 2004
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	
OH16-003 RIVERSIDE HOMES									
*Administration costs		18587		19134		19993		19993	19993
*Others: A/E fees & costs		2483		6009		3867		3867	0
*Site Improvement									
Repl./Upgr. Site Utilities				20000					
Landscaping				10000					
Site Lighting		45000							
Parking / Side Walks / Play Grounds				10000		23470		23470	0
*Dwelling Structure									
Upgrade HVAC system									
Upgrade electrical syst.									
Upgrade plumbing syst.				20000					
Upgrade build. interior						50000		50000	0
Upgrade build. exterior				44180					
Handicap compliance				10000					
Upgrade Security System		2182							
*Dwelling Equipment									
TOTAL PROJECT		68252		139323		97330		97330	19993
OH16-006 SUNSHINE TERRACE									
*Administration costs		26138		26907		28115		28115	28115
*Others: A/E fees & costs		100000		0		0		0	0
*Site Improvement		20000							
Repl./Upgr. Site Utilities		20000							
Landscaping		20000							
Site Lighting		25000							
Parking / Side Walks / Play Grounds		25000							
*Dwelling Structure									
Upgrade HVAC system		900000							
Upgrade electrical syst.		200000							
Upgrade plumbing syst.		100000							
Upgrade build. interior		200000							
Upgrade build. exterior		200000							
Handicap compliance		170000							
Upgrade Security System		20000							
*Dwelling Equipment									
TOTAL PROJECT		2026138		26907		28115		28115	28115
Subtotal of estimated Cost		2094390		166230		125445		125445	48108

FIVE-YEAR ACTION PLAN

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

PHYSICAL NEEDS

OFFICE OF PUBLIC AND INDIAN HOUSING

PART II: SUPPORTING PAGES

COMPREHENSIVE GRANT PROGRAM (CGP)2000-70

OMB Approval No. 2577-0157 (exp. 7/31/98)

Development Name/No. Major Work Category	year 1 : 2000		year 2 : 2001		year 3 : 2002		year 4 : 2003		year 5 : 2004
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	
<u>OH16-010 SAWYER TOWERS</u>									
*Administration costs		56923		58597		61228		61228	61228
*Others: A/E fees & costs		7605		18404		0		0	0
*Site Improvement									
Repl./Upgr. Site Utilities				20000					
Landscaping				10000					
Site Lighting		100000							
Parking / Side Walks / Play Grounds				20000					
*Dwelling Structure									
Upgrade HVAC system				70000					
Upgrade electrical syst.				20000					
Upgrade plumbing syst.				50000					
Upgrade build. interior				100000					
Upgrade build. exterior				59675					
Handicap compliance									
Upgrade Security System		44494							
*Dwelling Equipment									
TOTAL PROJECT		209022		\$426,676		61228		61228	61228
<u>OH16-012 JENKINS TERRACE</u>									
*Administration costs		28171		28999		30301		30301	30301
*Others: A/E fees & costs		3764		9108		50000		50000	50000
*Site Improvement									
Repl./Upgr. Site Utilities						75000		75000	75000
Landscaping						20000		20000	20000
Site Lighting		40000				10000		10000	10000
Parking / Side Walks / Play Grounds				20000		15000		15000	15000
*Dwelling Structure									
Upgrade HVAC system				50000		300000		300000	300000
Upgrade electrical syst.				20000		20000		20000	20000
Upgrade plumbing syst.				30000		20000		20000	20000
Upgrade build. interior				53054		490000		490000	490000
Upgrade build. exterior									
Handicap compliance									
Upgrade Security System		31510							
*Dwelling Equipment									
TOTAL PROJECT		103445		\$211,161		1030301		1030301	1030301

Subtotal of estimated Cost	312467	637837	1091529	1091529	1091529
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U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

PHYSICAL NEEDS

OFFICE OF PUBLIC AND INDIAN HOUSING

PART II: SUPPORTING PAGES

COMPREHENSIVE GRANT PROGRAM (CGP)2000-70

OMB Approval No. 2577-0157 (exp. 7/31/98)

Development Name/No. Major Work Category	year 1 : 2000		year 2 : 2001		year 3 : 2002		year 4 : 2003		year 5 : 2004
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	
<u>OH16-014 WORLER TERRACE</u>									
*Administration costs		32818		33783		35300		35300	70600
*Others: A/E fees & costs		4384		10610				50000	100000
*Site Improvement									
Repl./Upgr. Site Utilities				21599				20000	30000
Landscaping				10000				20000	10000
Site Lighting		50000						20000	0
Parking / Side Walks / Play Grounds								10000	10000
*Dwelling Structure									
Upgrade HVAC system				50000				300000	800000
Upgrade electrical syst.								30000	70000
Upgrade plumbing syst.				30000				30000	50000
Upgrade build. interior				50000				150000	570000
Upgrade build. exterior				40000				200000	300000
Handicap compliance								150000	50000
Upgrade Security System		33305						20000	10000
*Dwelling Equipment									
TOTAL PROJECT		120507		\$245,992		35300		1035300	2070600
<u>OH16-015 SUNSHINE ANNEX</u>									
*Administration costs		112732		19283		20149		20149	20149
*Others: A/E fees & costs		70000		6056		50000			
*Site Improvement									
Repl./Upgr. Site Utilities		50000							
Landscaping		20000							
Site Lighting		20000							
Parking / Side Walks / Play Grounds		10000		20000					
*Dwelling Structure									
Upgrade HVAC system		700000		50000					
Upgrade electrical syst.		50000				20000			
Upgrade plumbing syst.		50000		30000		20000			
Upgrade build. interior		100000				636666			
Upgrade build. exterior		100000		15072		193334			
Handicap compliance		150000				50000			
Upgrade Security System		23053				30000			
*Dwelling Equipment									
TOTAL PROJECT		1455785		\$140,411		1020149		20149	20149

Subtotal of estimated Cost	1576292	386403	1055449	1055449	2090749
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Development Name/No. Major Work Category	year 1 : 2000		year 2 : 2001		year 3 : 2002		year 4 : 2003		year 5 : 2004
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	
OH16-020 MARION SQUARE									
*Administration costs		37755		38865		40610		40610	40610
*Others: A/E fees & costs		5044		12207		0		0	0
*Site Improvement									
Repl./Upgr. Site Utilities				20000					
Landscaping				20000					
Site Lighting		80000							
Parking / Side Walks / Play Grounds				10000					
*Dwelling Structure									
Upgrade HVAC system									
Upgrade electrical syst.									
Upgrade plumbing syst.				40000					
Upgrade build. interior				50000					
Upgrade build. exterior				81000					
Handicap compliance				10927					
Upgrade Security System		15838							
*Dwelling Equipment									
TOTAL PROJECT		138637		\$282,999		40610		40610	40610
OH16-033 KENMORE SQUARE									
*Administration costs		8132		8371		8747		8747	8747
*Others: A/E fees & costs		1086		2629		1692		1692	
*Site Improvement									
Repl./Upgr. Site Utilities									
Landscaping				10000					
Site Lighting		15000							
Parking / Side Walks / Play Grounds				20000					
*Dwelling Structure									
Upgrade HVAC system									
Upgrade electrical syst.									
Upgrade plumbing syst.									
Upgrade build. interior									
Upgrade build. exterior				19954		32143		32143	
Handicap compliance									
Upgrade Security System		5642							
*Dwelling Equipment									
TOTAL PROJECT		29860		\$60,954		42582		42582	8747
Subtotal of estimated Cost		168497		343953		83192		83192	49357

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

PHYSICAL NEEDS

OFFICE OF PUBLIC AND INDIAN HOUSING

PART II: SUPPORTING PAGES

COMPREHENSIVE GRANT PROGRAM (CGP)2000-70

OMB Approval No. 2577-0157 (exp. 7/31/98)

Development Name/No. Major Work Category	year 1 : 2000		year 2 : 2001		year 3 : 2002		year 4 : 2003		year 5 : 2004
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	
OH16-035 POST OAK STATION I									
*Administration costs		10746		11062		11558		11558	11558
*Others: A/E fees & costs		1436		3474		2236		2236	
*Site Improvement									
Repl./Upgr. Site Utilities				20000					
Landscaping				10000					
Site Lighting		22000							
Parking / Side Walks / Play Grounds				10000					
*Dwelling Structure									
Upgrade HVAC system									
Upgrade electrical syst.									
Upgrade plumbing syst.									
Upgrade build. interior									
Upgrade build. exterior				26010		42475		42475	
Handicap compliance									
Upgrade Security System		5277							
*Dwelling Equipment									
TOTAL PROJECT		39459		\$80,546		56269		56269	11558
OH16-046 POST OAK STATION II									
*Administration costs		11326		11660		12183		12183	12183
*Others: A/E fees & costs		1513		3662		2356		2356	
*Site Improvement									
Repl./Upgr. Site Utilities									
Landscaping				20000					
Site Lighting		25000							
Parking / Side Walks / Play Grounds				15000					
*Dwelling Structure									
Upgrade HVAC system									
Upgrade electrical syst.									
Upgrade plumbing syst.									
Upgrade build. interior									
Upgrade build. exterior				34578		44770		44770	
Handicap compliance									
Upgrade Security System		3751							
*Dwelling Equipment									
TOTAL PROJECT		41590		\$84,900		59309		59309	12183

Subtotal of estimated Cost	81049	165446	115578	115578	23741
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FORM HUD-52834(10/96)

NAS

FIVE-YEAR ACTION PLAN

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

PHYSICAL NEEDS

OFFICE OF PUBLIC AND INDIAN HOUSING

PART II: SUPPORTING PAGES

COMPREHENSIVE GRANT PROGRAM (CGP)2000-70

OMB Approval No. 2577-0157 (exp. 7/31/98)

Development Name/No. Major Work Category	year 1 : 2000		year 2 : 2001		year 3 : 2002		year 4 : 2003		year 5 : 2004
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	
OH16-037 GLENVIEW ESTATE									
*Administration costs		7261		7474		7810		7810	7810
*Others: A/E fees & costs		970		2347		1510		1510	
*Site Improvement									
Repl./Upgr. Site Utilities									
Landscaping				10000					
Site Lighting		15000							
Parking / Side Walks / Play Grounds				10000					
*Dwelling Structure									
Upgrade HVAC system									
Upgrade electrical syst.									
Upgrade plumbing syst.									
Upgrade build. interior									
Upgrade build. exterior				20602		28700		28700	
Handicap compliance				4000					
Upgrade Security System		3430							
*Dwelling Equipment									
TOTAL PROJECT		26661		\$54,423		38020		38020	7810
OH16-038 MAPLEWOOD HEIGHTS									
*Administration costs		10310		10613		11090		11090	11090
*Others: A/E fees & costs		1377				0		0	0
*Site Improvement									
Repl./Upgr. Site Utilities									
Landscaping				10000					
Site Lighting		21000							
Parking / Side Walks / Play Grounds				10000					
*Dwelling Structure									
Upgrade HVAC system									
Upgrade electrical syst.									
Upgrade plumbing syst.									
Upgrade build. interior				20000					
Upgrade build. exterior				23334					
Handicap compliance									
Upgrade Security System		5171							
*Dwelling Equipment									
TOTAL PROJECT		37858		\$73,947		11090		11090	11090

Subtotal of estimated Cost	64519	128370	49110	49110	18900
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Development Name/No. Major Work Category	year 1 : 2000		year 2 : 2001		year 3 : 2002		year 4 : 2003		year 5 : 2004
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	
OH16-039 BOLLINGER TOWER									
*Administration costs		14521		14948		15619		15619	15619
*Others: A/E fees & costs		160801		4695		0		0	0
*Site Improvement									
Repl./Upgr. Site Utilities									
Landscaping									
Site Lighting		15000							
Parking / Side Walks / Play Grounds									
*Dwelling Structure									
Upgrade HVAC system		1041139							
Upgrade electrical syst.									
Upgrade plumbing syst.									
Upgrade build. interior									
Upgrade build. exterior				89203					
Handicap compliance									
Upgrade Security System		21861							
*Dwelling Equipment									
TOTAL PROJECT		1253322		\$108,846		15619		15619	15619
OH16-040 EASTMOOR SQUARE									
*Administration costs		7696		7923		8278		8278	8278
*Others: A/E fees & costs		1028		2488		1601		1601	
*Site Improvement									
Repl./Upgr. Site Utilities									
Landscaping									
Site Lighting		10000							
Parking / Side Walks / Play Grounds									
*Dwelling Structure									
Upgrade HVAC system									
Upgrade electrical syst.									
Upgrade plumbing syst.									
Upgrade build. interior									
Upgrade build. exterior				47278		30421		30421	
Handicap compliance									
Upgrade Security System		9536							
*Dwelling Equipment									
TOTAL PROJECT		28260		\$57,689		40300		40300	8278
Subtotal of estimated Cost		1281582		166535		55919		55919	23897

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

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OFFICE OF PUBLIC AND INDIAN HOUSING

PART II: SUPPORTING PAGES

COMPREHENSIVE GRANT PROGRAM (CGP)2000-70

OMB Approval No. 2577-0157 (exp. 7/31/98)

Development Name/No. Major Work Category	year 1 : 2000		year 2 : 2001		year 3 : 2002		year 4 : 2003		year 5 : 2004
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	
OH16-041 REEB HOSACK									
*Administration costs		3921		4036		4217		4217	4217
*Others: A/E fees & costs		524		1268		816		816	
*Site Improvement									
Repl./Upgr. Site Utilities									
Landscaping									
Site Lighting		9952							
Parking / Side Walks / Play Grounds									
*Dwelling Structure									
Upgrade HVAC system									
Upgrade electrical syst.									
Upgrade plumbing syst.									
Upgrade build. interior									
Upgrade build. exterior				24084		15498		15498	
Handicap compliance									
Upgrade Security System									
*Dwelling Equipment									
TOTAL PROJECT		14397		\$29,388		20531		20531	4217
OH16-042 CANONBY COURT									
*Administration costs		7261		7474		7810		7810	7810
*Others: A/E fees & costs		970		2347		1510		1510	
*Site Improvement									
Repl./Upgr. Site Utilities									
Landscaping									
Site Lighting		10000							
Parking / Side Walks / Play Grounds									
*Dwelling Structure									
Upgrade HVAC system									
Upgrade electrical syst.									
Upgrade plumbing syst.									
Upgrade build. interior									
Upgrade build. exterior				44602		28700		28700	
Handicap compliance									
Upgrade Security System		8430							
*Dwelling Equipment									
TOTAL PROJECT		26661		\$54,423		38020		38020	7810

Subtotal of estimated Cost	41058	83811	58551	58551	12027
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FIVE-YEAR ACTION PLAN

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

PHYSICAL NEEDS

OFFICE OF PUBLIC AND INDIAN HOUSING

PART II: SUPPORTING PAGES

COMPREHENSIVE GRANT PROGRAM (CGP)2000-705

OMB Approval No. 2577-0157 (exp. 7/31/98)

Development Name/No. Major Work Category	year 1 : 2000		year 2 : 2001		year 3 : 2002		year 4 : 2003		year 5 : 2004
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	
OH16-043 THORNWOOD COMMONS									
*Administration costs		12488		12855		13433		13433	13433
*Others: A/E fees & costs		1668		4038		2598		2598	
*Site Improvement									
Repl./Upgr. Site Utilities									
Landscaping									
Site Lighting		25000							
Parking / Side Walks / Play Grounds									
*Dwelling Structure									
Upgrade HVAC system									
Upgrade electrical syst.									
Upgrade plumbing syst.									
Upgrade build. interior									
Upgrade build. exterior				76714		49363		49363	
Handicap compliance									
Upgrade Security System		6700							
*Dwelling Equipment									
TOTAL PROJECT		45856		\$93,607		65394		65394	13433
OH16-044 TRIVETT HEIGHT									
*Administration costs		19894		20479		21398		21398	21398
*Others: A/E fees & costs		2660		6432		4139		4139	
*Site Improvement									
Repl./Upgr. Site Utilities									
Landscaping									
Site Lighting		40000							
Parking / Side Walks / Play Grounds				50000					
*Dwelling Structure									
Upgrade HVAC system									
Upgrade electrical syst.									
Upgrade plumbing syst.									
Upgrade build. interior									
Upgrade build. exterior				72507		78636		78636	
Handicap compliance									
Upgrade Security System		10499							
*Dwelling Equipment									
TOTAL PROJECT		73053		\$149,418		104173		104173	21398

Subtotal of estimated Cost	118909	243025	169567	169567	34831
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Development Name/No. Major Work Category	year 1 : 2000		year 2 : 2001		year 3 : 2002		year 4 : 2003		year 5 : 2004
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	
OH16-200 CMHA NEW OFFICE BUILDING									
*Administration costs		0		0		0		0	0
*Others: A/E fees & costs				0		0		0	0
*Site Improvement									
Site Utilities									
Landscaping									
Parking / Side Walks									
*Dwelling Structure									
HVAC system									
Electrical syst.									
Plumbing system									
Building interior									
Building exterior		507000							
Handicap compliance									
Security System									
*Dwelling Equipment									
TOTAL PROJECT		507000		\$0		0		0	0
OH16-201 CMHA NEW MAINTENANCE BUILDING									
*Administration costs		0		0		0		0	0
*Others: A/E fees & costs		200000		115000		0		0	0
*Site Improvement									
Site Utilities		300000		200000					
Landscaping				50000					
Parking / Side Walks		200000		200000					
*Dwelling Structure									
HVAC system				250000					
Electrical syst.				150000					
Plumbing system				200000					
Building interior				515000					
Building exterior				570000					
Handicap compliance				30000					
Security System				20000					
*Dwelling Equipment									
TOTAL PROJECT		700000		\$2,300,000		0		0	0
Subtotal of estimated Cost		1207000		2300000		0		0	0

Development Name/No. Major Work Category	year 1 : 2000		year 2 : 2001		year 3 : 2002		year 4 : 003		year : 2004
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	
CONSTRUCTION MANAGEMENT SERVICES		500000		500000		500000		500000	500000
OH16-202 NEW CONSTRUCTION									
*Administration costs		0		0		0		0	0
*Others: A/E fees & costs		0		0		146500		146500	146500
*Site Improvement						800000		800000	746500
Site Utilities									
Landscaping									
Parking / Side Walks									
*Dwelling Structure						1500000		1500000	1005465
HVAC system									
Electrical syst.									
Plumbing system									
Building interior									
Building exterior									
Handicap compliance									
Security System									
*Dwelling Equipment									
TOTAL PROJECT		0		\$0		2446500		2446500	1898465
Subtotal of estimated Cost		500000		500000		2946500		2946500	2398465
OH16-013 TAYLOR TERRACE									
*Administration costs		37897		42347		40764		40764	
GRAND TOTALS		7870000		5952000		5905000		5905000	#VALUE!

(Admin / A&E / Site Improv.
Dwelling Struct. / Dwell. Equip. &
Construction Management C.M.)

7870000

5952000

5905000

5905000

#VALUE!

Management Improvements	850000	784000	819000	819000	819000
Operating Deficit	300667	264000	276000	276000	276000
Non Dwelling	0	0	0	0	0
Replacement Reserve	0	0	0	0	0
Non CGP Funds	0	0	0	0	0
-----	=====	=====	=====	=====	=====
Grand Application Total	9020667	7000000	7000000	7000000	#VALUE!
HUD Approved Fund	7500000	7000000	7000000	\$7,000,000	\$7,000,000
-----	=====	=====	=====	=====	=====
Error	-1520667	0	0	0	#VALUE!

Year 1	Year 2:	FFY:	2001		Year 3:	FFY:	2002	
FF	Development Name/No. Major Work Category	Quantity Lumpsum	Estimated Cost		Development Name/ Major Work Category	Quantity Lumpsum	Estimated Cost	
	<u>OH16-047 New Construction</u>		4458000		<u>OH16-047 New Construction</u>		4643476	
	<u>CONSTRUCTION MANAGEMENT SERVICES</u>		689228		<u>CONSTRUCTION MANAGEME</u>		689228	
	<u>OH16-010 Sawyer Towers</u>				<u>OH16-010 Sawyer Towers</u>			
	*Administration costs		6530		*Administration costs		6530	
	*Others: A/E fees & costs		5000		*Others: A/E fees & costs		5000	
	*Site Improvement				*Site Improvement			
	Repl./Upgr. Site Utilities				Repl./Upgr. Site Utilities			
	Landscaping				Landscaping			
	Parking/Side W./Play G.				Parking/Side W./Play G.			
	*Dwelling Structure				*Dwelling Structure			
	Upgrade HVAC system				Upgrade HVAC system			
	Upgrade electrical syst.				Upgrade electrical syst.			
	Upgrade plumbing syst.				Upgrade plumbing syst.			
	Upgrade build. interior		15000		Upgrade build. interior		15000	
	Upgrade build. exterior				Upgrade build. exterior			
	Handicap compliance				Handicap compliance			
	Asbestos abatement				Asbestos abatement			
	*Dwelling Equipment				*Dwelling Equipment			
See	TOTAL PROJECT	0k	26530		TOTAL PROJECT	0k	26530	
ateme	<u>OH16-014 Worley Terrace</u>				<u>OH16-014 Worley Terrace</u>			
	*Administration costs		104482		*Administration costs		104482	
	*Others: A/E fees & costs		10000		*Others: A/E fees & costs		10000	
	*Site Improvement				*Site Improvement			
	Repl./Upgr. Site Utilities		20000		Repl./Upgr. Site Utilities		20000	
	Landscaping		20000		Landscaping		20000	
	Parking/Side W./Play G.		20000		Parking/Side W./Play G.		20000	
	*Dwelling Structure				*Dwelling Structure			
	Upgrade HVAC system		100000		Upgrade HVAC system		100000	
	Upgrade electrical syst.		25000		Upgrade electrical syst.		25000	
	Upgrade plumbing syst.		25000		Upgrade plumbing syst.		25000	
	Upgrade build. interior		60000		Upgrade build. interior		60000	
	Upgrade build. exterior		40000		Upgrade build. exterior		40000	
	Handicap compliance				Handicap compliance			
	Asbestos abatement				Asbestos abatement			
	*Dwelling Equipment				*Dwelling Equipment			

TOTAL PROJECT	424482	TOTAL PROJECT	424482
Subtotal of estimated Cost:	5598240	Subtotal of estimated Cost:	5783716

FIVE-YEAR ACTION PLAN

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

PHYSICAL NEEDS

OFFICE OF PUBLIC AND INDIAN HOUSING

PART II: SUPPORTING PAGES

COMPREHENSIVE GRANT PROGRAM (CGP) 1998

OMB Approval No. 2577-0157 (exp. 7/31/98)

Year 1	Year 2:	FFY:	2001	Year 3:	FFY:	2002
FF	Development Name/No. Major Work Category	Quantity Lumpsum	Estimated Cost	Development Name/ Major Work Category	Quantity Lumpsum	Estimated Cost
	<u>OH16-015 Sunshine Annex</u>			<u>OH16-015 Sunshine Annex</u>		
	*Administration costs		65301	*Administration costs		65301
	*Others: A/E fees & costs		15000	*Others: A/E fees & costs		15000
	*Site Improvement			*Site Improvement		
	Repl./Upgr. Site Utilities			Repl./Upgr. Site Utilities		
	Landscaping		20000	Landscaping		20000
	Parking/Side W./Play G.		40000	Parking/Side W./Play G.		40000
	*Dwelling Structure			*Dwelling Structure		
	Upgrade HVAC system		125000	Upgrade HVAC system		125000
	Upgrade electrical syst.			Upgrade electrical syst.		
	Upgrade plumbing syst.			Upgrade plumbing syst.		
	Upgrade build. interior			Upgrade build. interior		
	Upgrade build. exterior			Upgrade build. exterior		
	Handicap compliance			Handicap compliance		
	Asbestos abatement			Asbestos abatement		
	*Dwelling Equipment			*Dwelling Equipment		
See	TOTAL PROJECT	0k	265301	TOTAL PROJECT	0k	265301
Item:	<u>OH16-018 Scattered Site</u>			<u>OH16-018 Scattered Site</u>		
	*Administration costs		32651	*Administration costs		32651
	*Others: A/E fees & costs		10000	*Others: A/E fees & costs		10000
	*Site Improvement			*Site Improvement		
	Repl./Upgr. Site Utilities		15000	Repl./Upgr. Site Utilities		15000
	Landscaping			Landscaping		
	Parking/Side W./Play G.		15000	Parking/Side W./Play G.		15000

*Dwelling Structure		*Dwelling Structure	
Upgrade HVAC system	15000	Upgrade HVAC system	15000
Upgrade electrical syst.	15000	Upgrade electrical syst.	15000
Upgrade plumbing syst.	15000	Upgrade plumbing syst.	15000
Upgrade build. interior	15000	Upgrade build. interior	15000
Upgrade build. exterior		Upgrade build. exterior	
Handicap compliance		Handicap compliance	
Asbestos abatement		Asbestos abatement	
*Dwelling Equipment		*Dwelling Equipment	
TOTAL PROJECT	132651	TOTAL PROJECT	132651
Subtotal of estimated Cost:	397952	Subtotal of estimated Cost:	397952

FIVE-YEAR ACTION PLAN

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

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OFFICE OF PUBLIC AND INDIAN HOUSING

PART II: SUPPORTING PAGES

COMPREHENSIVE GRANT PROGRAM (CGP) 1998

OMB Approval No. 2577-0157 (exp. 7/31/98)

Year 1	Year 2:	FFY:	2001	Year 3:	FFY:	2002
FF	Development Name/No. Major Work Category	Quantity Lumpsum	Estimated Cost	Development Name/ Major Work Category	Quantity Lumpsum	Estimated Cost
	<u>OH16-020 Marion Square</u>			<u>OH16-020 Marion Square</u>		
	*Administration costs		5953	*Administration costs		5953
	*Others: A/E fees & costs			*Others: A/E fees & costs		
	*Site Improvement			*Site Improvement		
	Repl./Upgr. Site Utilities			Repl./Upgr. Site Utilities		
	Landscaping			Landscaping		
	Parking/Side W./Play G.			Parking/Side W./Play G.		
	*Dwelling Structure			*Dwelling Structure		
	Upgrade HVAC system			Upgrade HVAC system		132650
	Upgrade electrical syst.			Upgrade electrical syst.		
	Upgrade plumbing syst.			Upgrade plumbing syst.		
	Upgrade build. interior			Upgrade build. interior		
	Upgrade build. exterior			Upgrade build. exterior		
	Handicap compliance		18231	Handicap compliance		18231
	Asbestos abatement			Asbestos abatement		
	*Dwelling Equipment			*Dwelling Equipment		

See	TOTAL PROJECT	0k	24184	TOTAL PROJECT	0k	156834
ateme	<u>OH16-021 Scattered Sites</u>			<u>OH16-021 Scattered Sites</u>		
	*Administration costs		32650	*Administration costs		32650
	*Others: A/E fees & costs		10000	*Others: A/E fees & costs		10000
	*Site Improvement			*Site Improvement		
	Repl./Upgr. Site Utilities			Repl./Upgr. Site Utilities		
	Landscaping			Landscaping		
	Parking/Side W./Play G.			Parking/Side W./Play G.		
	*Dwelling Structure			*Dwelling Structure		
	Upgrade HVAC system		90000	Upgrade HVAC system		90000
	Upgrade electrical syst.			Upgrade electrical syst.		
	Upgrade plumbing syst.			Upgrade plumbing syst.		
	Upgrade build. interior			Upgrade build. interior		
	Upgrade build. exterior			Upgrade build. exterior		
	Handicap compliance			Handicap compliance		
	Asbestos abatement			Asbestos abatement		
	*Dwelling Equipment			*Dwelling Equipment		
	TOTAL PROJECT		132650	TOTAL PROJECT		132650
	Subtotal of estimated Cost:		156834	Subtotal of estimated Cost:		289484

Year 1	Year 2:	FFY:	2001		Year 3:	FFY:	2002	
FF	Development Name/No. Major Work Category		Quantity Lumpsum	Estimated Cost	Development Name/ Major Work Category	Quantity Lumpsum	Estimated Cost	
	<u>OH16-028 Ohio Townehouses</u>				<u>OH16-028 Ohio Townehouses</u>			
	*Administration costs			65301	*Administration costs		65301	
	*Others: A/E fees & costs			10000	*Others: A/E fees & costs		10000	
	*Site Improvement				*Site Improvement			
	Repl./Upgr. Site Utilities				Repl./Upgr. Site Utilities			
	Landscaping				Landscaping			
	Parking/Side W./Play G.				Parking/Side W./Play G.			
	*Dwelling Structure				*Dwelling Structure			
	Upgrade HVAC system				Upgrade HVAC system			
	Upgrade electrical syst.				Upgrade electrical syst.			
	Upgrade plumbing syst.				Upgrade plumbing syst.			
	Upgrade build. interior			190000	Upgrade build. interior		190000	
	Upgrade build. exterior				Upgrade build. exterior			
	Handicap compliance				Handicap compliance			
	Asbestos abatement				Asbestos abatement			
	*Dwelling Equipment				*Dwelling Equipment			
See	TOTAL PROJECT		0k	265301	TOTAL PROJECT	0k	265301	
ateme	<u>OH16-035 Post Oak Station</u>				<u>OH16-035 Post Oak Station</u>			
	*Administration costs			32651	*Administration costs		32651	
	*Others: A/E fees & costs			5000	*Others: A/E fees & costs		5000	
	*Site Improvement				*Site Improvement			
	Repl./Upgr. Site Utilities				Repl./Upgr. Site Utilities			
	Landscaping				Landscaping			
	Parking/Side W./Play G.				Parking/Side W./Play G.			
	*Dwelling Structure				*Dwelling Structure			
	Upgrade HVAC system			15000	Upgrade HVAC system		15000	
	Upgrade electrical syst.			15000	Upgrade electrical syst.		15000	
	Upgrade plumbing syst.				Upgrade plumbing syst.			
	Upgrade build. interior				Upgrade build. interior			
	Upgrade build. exterior				Upgrade build. exterior			
	Handicap compliance				Handicap compliance			
	Asbestos abatement				Asbestos abatement			
	*Dwelling Equipment			27000	*Dwelling Equipment			

TOTAL PROJECT	94651	TOTAL PROJECT	67651
Subtotal of estimated Cost:	359952	Subtotal of estimated Cost:	332952

FIVE-YEAR ACTION PLAN

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

PHYSICAL NEEDS

OFFICE OF PUBLIC AND INDIAN HOUSING

PART II: SUPPORTING PAGES

COMPREHENSIVE GRANT PROGRAM (CGP) 1998

OMB Approval No. 2577-0157 (exp. 7/31/98)

Year 1	Year 2:	FFY:	2001	Year 3:	FFY:	2002
FF	Development Name/No. Major Work Category	Quantity Lumpsum	Estimated Cost	Development Name/ Major Work Category	Quantity Lumpsum	Estimated Cost
	<u>OH16-038 Maplewood Heights</u>			<u>OH16-038 Maplewood Heights</u>		
	*Administration costs		6530	*Administration costs		6530
	*Others: A/E fees & costs			*Others: A/E fees & costs		
	*Site Improvement			*Site Improvement		
	Repl./Upgr. Site Utilities			Repl./Upgr. Site Utilities		
	Landscaping			Landscaping		
	Parking/Side W./Play G.			Parking/Side W./Play G.		
	*Dwelling Structure			*Dwelling Structure		
	Upgrade HVAC system			Upgrade HVAC system		
	Upgrade electrical syst.			Upgrade electrical syst.		
	Upgrade plumbing syst.			Upgrade plumbing syst.		
	Upgrade build. interior		20000	Upgrade build. interior		20000
	Upgrade build. exterior			Upgrade build. exterior		
	Handicap compliance			Handicap compliance		
	Asbestos abatement			Asbestos abatement		
	*Dwelling Equipment			*Dwelling Equipment		
See	TOTAL PROJECT	0k	26530	TOTAL PROJECT	0k	26530
ateme	<u>OH16-Bollinger Tower</u>			<u>OH16-Bollinger Tower</u>		
	*Administration costs		65301	*Administration costs		65301
	*Others: A/E fees & costs		10000	*Others: A/E fees & costs		10000
	*Site Improvement			*Site Improvement		
	Repl./Upgr. Site Utilities			Repl./Upgr. Site Utilities		

Landscaping		Landscaping	
Parking/Side W./Play G.		Parking/Side W./Play G.	
*Dwelling Structure		*Dwelling Structure	
Upgrade HVAC system		Upgrade HVAC system	
Upgrade electrical syst.		Upgrade electrical syst.	
Upgrade plumbing syst.		Upgrade plumbing syst.	
Upgrade build. interior	50000	Upgrade build. interior	50000
Upgrade build. exterior	40000	Upgrade build. exterior	40000
Handicap compliance		Handicap compliance	
Asbestos abatement		Asbestos abatement	
*Dwelling Equipment	100000	*Dwelling Equipment	100000
TOTAL PROJECT	265301	TOTAL PROJECT	265301
Subtotal of estimated Cost:	291831	Subtotal of estimated Cost:	291831

FIVE-YEAR ACTION PLAN

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

PHYSICAL NEEDS

OFFICE OF PUBLIC AND INDIAN HOUSING

PART II: SUPPORTING PAGES

COMPREHENSIVE GRANT PROGRAM (CGP) 1998

OMB Approval No. 2577-0157 (exp. 7/31/98)

Year 1	Year 2:	FFY:	2001	Year 3:	FFY:	2002
FF	Development Name/No. Major Work Category	Quantity Lumpsum	Estimated Cost	Development Name/ Major Work Category	Quantity Lumpsum	Estimated Cost
	<u>OH16-046 Post Oak station</u>			<u>OH16-046 Post Oak station</u>		
	*Administration costs		32650	*Administration costs		32650
	*Others: A/E fees & costs		5000	*Others: A/E fees & costs		5000
	*Site Improvement			*Site Improvement		
	Repl./Upgr. Site Utilities			Repl./Upgr. Site Utilities		
	Landscaping			Landscaping		
	Parking/Side W./Play G.			Parking/Side W./Play G.		
	*Dwelling Structure			*Dwelling Structure		
	Upgrade HVAC system		15000	Upgrade HVAC system		15000
	Upgrade electrical syst.		15000	Upgrade electrical syst.		15000
	Upgrade plumbing syst.			Upgrade plumbing syst.		
	Upgrade build. interior			Upgrade build. interior		
	Upgrade build. exterior			Upgrade build. exterior		
	Handicap compliance			Handicap compliance		
	Asbestos abatement			Asbestos abatement		

	*Dwelling Equipment		65000	*Dwelling Equipment		65000
See	TOTAL PROJECT	0k	132650	TOTAL PROJECT	0k	132650
atement						
	TOTAL PROJECT	0k	0	TOTAL PROJECT	0k	0
	Subtotal of estimated Cost:		132650	Subtotal of estimated Cost:		132650
	GRAND TOTALS FFY		6937459			6937459

Admin / A&E / Site Improv. 6937459
Dwelling Struct. / Dwell. Equip.

Construction Management C.M. INCLUDED

Management Improvements 750000

Operating Deficit 450000

Non Dwelling 0

Replacement Reserve 0

Non CGP Funds 0

Grand Application Total 8137459

HUD Approved Fund 8137459

Error 0

Admin / A&E / Site Improv. 6937459
Dwelling Struct. / Dwell. Equip.

Construction Ma INCLUDED

Management Improvements 750000

Operating Deficit 450000

Non Dwelling 0

Replacement Reserve 0

Non CGP Funds 0

Grand Application Total 8137459

HUD Approved Fund 8137459

Error 0

FIVE-YEAR ACTION PLAN
MANAGEMENT NEEDS

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING

PART III: SUPPORTING PAGES

COMPREHENSIVE GRANT PROGRAM (CGP) 2000 -- 709

Development Name/No. Major Work Category	YEAR 1 : 2000		YEAR 2 : 2000		YEAR 3 : 2000		YEAR 4 : 2000		YEAR
	Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units
OFF - DUTY POLICE	OK	252241		259808		271616		271616	
# PROJECT # & NAME									
1 OH16-001 Poindexter Village	414	51315.85946		52855.2885		55257.50565		55257.5057	
2 OH16-002 Lincoln Park	312	38672.82162		39832.971		41643.33759		41643.3376	
3 OH16-003 Riverside Bradley	128	15865.77297		16341.7317		17084.44619		17084.4462	
4 OH16-005 Rosewind	230	28508.81081		29364.0491		30698.61425		30698.6143	
5 OH16-020 Marion Square	260	32227.35135		33194.1425		34702.78133		34702.7813	
6 OH16-028 Ohio Townhouses	80	9916.108108		10213.5823		10677.77887		10677.7789	
7 OH16-033 Kenmore Square	56	6941.275676		7149.50762		7474.445209		7474.44521	
8 OH16-035 Post Oak Station I	74	9172.4		9447.56364		9876.945455		9876.94545	
9 OH16-037 Glenview Estates	50	6197.567568		6383.48894		6673.611794		6673.61179	
10 OH16-040 Eastmoor Square	53	6569.421622		6766.49828		7074.028501		7074.0285	
11 OH16-041 Reeb Hosack	27	3346.686486		3447.08403		3603.750369		3603.75037	
12 OH16-042 Canonby Court	50	6197.567568		6383.48894		6673.611794		6673.61179	
13 OH16-043 Thornwood Commons	86	10659.81622		10979.601		11478.61229		11478.6123	
14 OH16-044 Trevitt Heights	137	16981.33514		17490.7597		18285.69631		18285.6963	
15 OH16-046 Post Oak Station II	78	9668.205405		9958.24275		10410.8344		10410.8344	
SUB - TOTAL	2035	252241		259808		271616		271616	
SECURITY GUARD (Rev2000)	OK	329119		302942		316711		316711	
# PROJECT # & NAME									
1 OH16-006 Sunshine Terrace	180	32675.90734		30076.9774		31444.00441		31444.0044	
2 OH16-010 Sawyer Towers	392	71160.86486		65500.973		68478.05405		68478.0541	
3 OH16-012 Jenkins Terrace	194	35217.3668		32416.2978		33889.6492		33889.6492	
4 OH16-013 Taylor Terrace	261	47380.06564		43611.6172		45593.8064		45593.8064	
5 OH16-014 Worley Terrace	226	41026.41699		37763.3161		39479.69443		39479.6944	
6 OH16-015 Sunshine Annex	129	23417.73359		21555.1671		22534.86983		22534.8698	
7 OH16-020 Marion Square	260	47198.53282		43444.5229		45419.11748		45419.1175	
8 OH16-038 Maplewood Heights	71	12888.83012		11863.6966		12402.91285		12402.9129	
9 OH16-039 Bollinger Tower	100	18153.28185		16709.4319		17468.89134		17468.8913	
SUB - TOTAL	1813	329119		302942		316711		316711	

**FIVE-YEAR ACTION PLAN
MANAGEMENT NEEDS
PART III: SUPPORTING PAGES**

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING

COMPREHENSIVE GRANT PROGRAM (CGP) 2000 -- 709

Development Name/No. Major Work Category	YEAR 2:	2000	YEAR 3: 2001		YEAR 4: 2002		YEAR 5: 2003	
	Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units	Estimated Cost
<u>RESIDENT SPECIALIST FAMILY</u>		38873		40038		41858		41858
# <u>PROJECT # & NAME</u>								
1 OH16-001 Poindexter Village	414	7908.315479		8145.32285		8515.583292		8515.58329
2 OH16-002 Lincoln Park	312	5959.889926		6138.50418		6417.541032		6417.54103
3 OH16-003 Riverside Bradley	128	2445.083047		2518.36069		2632.837346		2632.83735
4 OH16-005 Rosewind	230	4393.5086		4525.17936		4730.879607		4730.87961
5 OH16-020 Marion Square	260	4966.574939		5115.42015		5347.95086		5347.95086
6 OH16-028 Ohio Townhouses	80	1528.176904		1573.97543		1645.523342		1645.52334
7 OH16-033 Kenmore Square	56	1069.723833		1101.7828		1151.866339		1151.86634
8 OH16-035 Post Oak Station I	74	1413.563636		1455.92727		1522.109091		1522.10909
9 OH16-037 Glenview Estates	50	955.1105651		983.734644		1028.452088		1028.45209
10 OH16-040 Eastmoor Square	53	1012.417199		1042.75872		1090.159214		1090.15921
11 OH16-041 Reeb Hosack	27	515.7597052		531.216708		555.3641278		555.364128
12 OH16-042 Canonby Court	50	955.1105651		983.734644		1028.452088		1028.45209
13 OH16-043 Thornwood Commons	86	1642.790172		1692.02359		1768.937592		1768.93759
14 OH16-044 Trevitt Heights	137	2617.002948		2695.43292		2817.958722		2817.95872
15 OH16-046 Post Oak Station II	78	1489.972482		1534.62604		1604.385258		1604.38526
SUB - TOTAL	2035	38873		40038		41858		41858
<u>RES. SPECIALIST SENIOR (Rev2000)</u>		65365		42219		44138		44138
# <u>PROJECT # & NAME</u>								
1 OH16-006 Sunshine Terrace	180	6489.630447		4191.62714		4382.151131		4382.15113
2 OH16-010 Sawyer Towers	392	14132.97297		9128.43243		9543.351351		9543.35135
3 OH16-012 Jenkins Terrace	194	6994.379482		4517.64258		4722.985108		4722.98511
4 OH16-013 Taylor Terrace	261	9409.964148		6077.85935		6354.11914		6354.11914
5 OH16-014 Worley Terrace	226	8148.091561		5262.82074		5502.034197		5502.0342
6 OH16-015 Sunshine Annex	129	4650.90182		3003.99945		3140.541644		3140.54164
7 OH16-020 Marion Square	260	9373.910645		6054.57253		6329.773855		6329.77386
8 OH16-038 Maplewood Heights	71	2559.798676		1653.36404		1728.515168		1728.51517
9 OH16-039 Bollinger Tower	100	3605.350248		2328.68174		2434.528406		2434.52841

SUB - TOTAL	1813	65365	42219	44138	44138
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FIVE-YEAR ACTION PLAN

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

MANAGEMENT NEEDS

OFFICE OF PUBLIC AND INDIAN HOUSING

PART III: SUPPORTING PAGES

COMPREHENSIVE GRANT PROGRAM (CGP) 2000 -- 709

Development Name/No. Major Work Category	YEAR 2:	2000	YEAR 3: 2001		YEAR 4: 2002		YEAR 5: 2003	
	Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units	Estimated Cost
<u>MENTAL HEALTH LEASON (Rev2000)</u>		66597		53146		55561		55561
# PROJECT # & NAME								
1 OH16-006 Sunshine Terrace	180	6611.947049		5276.492		5516.260342		5516.26034
2 OH16-010 Sawyer Towers	392	14399.35135		11491.027		12013.18919		12013.1892
3 OH16-012 Jenkins Terrace	194	7126.209597		5686.88582		5945.302813		5945.30281
4 OH16-013 Taylor Terrace	261	9587.323221		7650.9134		7998.577496		7998.5775
5 OH16-014 Worley Terrace	226	8301.666851		6624.92885		6925.971318		6925.97132
6 OH16-015 Sunshine Annex	129	4738.562052		3781.48593		3953.319912		3953.31991
7 OH16-020 Marion Square	260	9550.590182		7621.59956		7967.931605		7967.93161
8 OH16-038 Maplewood Heights	71	2608.04578		2081.28296		2175.858246		2175.85825
9 OH16-039 Bollinger Tower	100	3673.303916		2931.38445		3064.589079		3064.58908
SUB - TOTAL	1813	66597		53146		55561		55561
<u>RESIDENT SERVICE MANAGER / SECERTARY Rev2000)</u>		97805		85289		89165		89165
PROJECT # & NAME								
1 OH16-001 Poindexter Village	414	11285.19231		9841.03846		10288.26923		10288.2692
2 OH16-002 Lincoln Park	312	8504.782609		7416.43478		7753.478261		7753.47826
3 OH16-003 Riverside Bradley	128	3489.141583		3042.63991		3180.914158		3180.91416
4 OH16-005 Rosewind 230 units	230	6269.551282		5467.24359		5715.705128		5715.70513
5 OH16-006 Sunshine Terrace	180	4906.605351		4278.71237		4473.160535		4473.16054
6 OH16-010 Sawyer Towers	392	10685.4961		9318.08473		9741.54961		9741.54961
7 OH16-012 Jenkins Terrace	194	5288.230212		4611.50111		4821.073021		4821.07302
8 OH16-013 Taylor Terrace	261	7114.577759		6204.13294		6486.082776		6486.08278
9 OH16-014 Worley Terrace	226	6160.515608		5372.16109		5616.301561		5616.30156
10 OH16-015 Sunshine Annex	129	3516.400502		3066.41054		3205.76505		3205.76505
11 OH16-020 Marion Square	260	7087.318841		6180.36232		6461.231884		6461.23188
12 OH16-028 Ohio Townhouses	80	2180.713489		1901.64994		1988.071349		1988.07135
13 OH16-033 Kenmore Square	56	1526.499443		1331.15496		1391.649944		1391.64994

14	OH16-035	Post Oak Station I	74	2017.159978	1759.0262	1838.965998	1838.966
15	OH16-037	Glenview Estates	50	1362.945931	1188.53122	1242.544593	1242.54459
16	OH16-038	Maplewood Heights	71	1935.383222	1687.71433	1764.413322	1764.41332
17	OH16-039	Bollinger Tower	100	2725.891862	2377.06243	2485.089186	2485.08919

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**FIVE-YEAR ACTION PLAN
MANAGEMENT NEEDS
PART III: SUPPORTING PAGES**

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING

COMPREHENSIVE GRANT PROGRAM (CGP) 2000 -- 709

Development Name/No. Major Work Category	YEAR 2:	2000	YEAR 3: 2001		YEAR 4: 2002		YEAR 5: 2003	
	Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units	Estimated Cost
<u>RESIDENT SERVICE MANAGER / SECERTARY (Rev2000)</u>								
<u>PROJECT # & NAME</u>								
18 OH16-040 Eastmoor Square	53	1444.722687		1259.84309		1317.097269		1317.09727
19 OH16-041 Reeb Hosack	27	735.9908027		641.806856		670.9740803		670.97408
20 OH16-042 Canonby Court	50	1362.945931		1188.53122		1242.544593		1242.54459
21 OH16-043 Thornwood Commons	86	2344.267001		2044.27369		2137.1767		2137.1767
22 OH16-044 Trevitt Heights	137	3734.471851		3256.57553		3404.572185		3404.57219
23 OH16-046 Post Oak Station II	78	2126.195652		1854.1087		1938.369565		1938.36957
SUB - TOTAL	3588	97805		85289		89165		89165
GRAND TOTAL		850000		783442		819049		819049

FORM HUD - 52834

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5 : 2000	N
Estimated Cost	
271616	
55257.5057	
41643.3376	
17084.4462	
30698.6143	
34702.7813	
10677.7789	
7474.44521	
9876.94545	
6673.61179	
7074.0285	
3603.75037	
6673.61179	
11478.6123	
18285.6963	
10410.8344	
271616	
316711	
31444.0044	
68478.0541	
33889.6492	
45593.8064	
39479.6944	
22534.8698	
45419.1175	
12402.9129	
17468.8913	
316711	

NAS

41858

8515.58329
6417.54103
2632.83735
4730.87961
5347.95086
1645.52334
1151.86634
1522.10909
1028.45209
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555.364128
1028.45209
1768.93759
2817.95872
1604.38526

41858

44138

4382.15113
9543.35135
4722.98511
6354.11914
5502.0342
3140.54164
6329.77386
1728.51517
2434.52841

44138

NAS

N

55561

5516.26034

12013.1892

5945.30281

7998.5775

6925.97132

3953.31991

7967.93161

2175.85825

3064.58908

55561

89165

10288.2692

7753.47826

3180.91416

5715.70513

4473.16054

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6486.08278

5616.30156

3205.76505

6461.23188

1988.07135

1391.64994

1838.966
1242.54459
1764.41332
2485.08919

NAS

1317.09727
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1242.54459
2137.1767
3404.57219
1938.36957

89165

819049

NAS

THE COLUMBUS METROPOLITAN
HOUSING AUTHORITY

2000 PUBLIC HOUSING DRUG ELIMINATION PROGRAM SUBMISSION

Introduction

The Columbus Metropolitan Housing Authority has developed a strategy to reduce drug abuse and drug-related crime by implementing a new in-house security program and providing enhanced on-site services for residents. The new security program will replace and expand a failing contract security program now in place at CMHA's high-rise properties. The new program will increase coverage and responsiveness while providing support to management personnel. On-site services will include new educational and recreational opportunities for young people as well as access to counseling and treatment services for youth, adults and families when required.

Drug abuse and drug-related crime occurs throughout the City of Columbus. Between 1995 and 1998, however, over 28% of all arrests for drug abuse or related crimes took place in or around CMHA properties. This is a higher percentage than for any other category of offense. Although most of these arrests were not made on authority property and authority residents were not involved, the proximity of these crimes has an adverse impact on the quality of life for all CMHA residents.

CMHA has chosen to focus this year's drug elimination program on six high-rise properties and four family developments. These properties comprise 58% of CMHA's units, but they also comprise a disproportionate percentage of evictions for drug-related lease violations. In 1997 and 1998, these properties yielded the majority of drug-related evictions from CMHA housing. In 1997, 35 of 42 families evicted for drug-related reasons lived in these developments, accounting for 83% of all drug-related evictions. The numbers were similar in 1998. These properties accounted for 29 of 38 evictions for drug violations, or 76% percent of the total.

Section One:

The Columbus Metropolitan Housing Authority Properties Targeted by the Drug Elimination Plan

The Columbus Metropolitan Housing Authority Drug elimination plan has targeted some of CMHA's largest properties. The security support officers will serve these high-rise properties:

▶	Sunshine Terrace 241 McDowell Street	179 Units	
▶	88 East 1st Street	Taylor Terrace	264 Units
▶	Sunshine Annex 241 McDowell Street	129 Units	
▶	99 S. Central Street	Worley Terrace	224 Units
▶	Sawyer Towers 525 Sawyer Boulevard	391 Units	
▶	750 North High Street	Bollinger Tower	100 Units

These family properties will be home to the new youth and adult programs:

▶	Poindexter Village 240 North Champion	414 Units	
▶	Riverside Homes/Bradley 241 McDowell Street	128 Units	
▶	Lincoln Park 1755 South 20th Street	312 Units	
▶	Trevitt Heights 940 Caldwell	Sawyer Manor Units 137 Units	116

Together, these properties comprise 58% of CMHA's total public housing units. The remaining high-rises -- Jenkins Terrace, Maplewood Heights and Marion Square -- have been equipped with enhanced security hardware. Several of the other family properties are already served by latchkey and meals programs for

children. Those already served are Glenview Estate, Eastmoor Square, Canonby Court and Post Oak Station.

Section Two:

The Columbus Metropolitan Housing Authority Plan to Reduce Drug Abuse and Drug-Related Crime

The Columbus Metropolitan Housing Authority has developed a comprehensive approach to solving the problem of drug abuse, drug-related crime and the problems associated with drug-related crime on its properties. The plan set forth in this submission is one that addresses both the safety and security of CMHA residents and their need for activities and services that reduce the risk of drug use and abuse.

There are three major aspects to any comprehensive drug elimination program. The first is crime prevention and security. The purpose of the crime prevention is to remove the source of drugs and improve the sense of security of CMHA residents. The second aspect is drug abuse prevention, which includes a variety of efforts such as education, counseling, recreation and job training. The objective of these efforts is to give residents the information they need to say no to involvement with illegal drugs and the activities, education and job skills needed to provide an alternative to drugs. The final aspect is treatment for those who want to leave drug abuse behind. In this plan, CMHA plans to address all these aspects.

Any successful program to address drug elimination must have a community-based strategy. Accordingly, CMHA has developed a plan enabling it to improve its ability to work with its high-rise resident communities by employing security management staff to replace contract guards. At the same time, it will contract with well-known community organizations to offer after-school and recreational opportunities to young people on its family properties. Other local providers will be engaged to make counseling available to the youth and families who need it.

The CMHA Drug Elimination Plan encompasses a broad range of activities that focus on crime prevention and security and the prevention of drug use.

Security and Crime Prevention

Problem Statement

Drug abuse and drug-related crime occur throughout the city of Columbus. However, between 1995 and 1998, over 28% of all arrests for drug abuse or related crimes took place in or around CMHA properties. This is a higher percentage than is found for any other category of offense. . Although most of these arrests were not made on authority property and authority residents were not involved, the proximity of these crimes has an adverse impact on the quality of life of CMHA residents.

CMHA has chosen to focus this year's drug elimination program on six high-rise properties and four family developments. These properties comprise nearly 60% of CMHA's units, but they also comprise a disproportionate percentage of evictions for drug related evictions from CMHA housing. In 1997, 35 of 42 families evicted for drug related reasons lived in these developments, accounting for 83 % of all CMHA drug-related evictions that year. The statistics were similar for 1998. In that year, these properties accounted for 29 of 38 evictions for drug violations, or 76% of the total.

In Columbus, as in most communities, drug abuse and drug-related crime are a community problem. Although most crime does not occur in and around public housing communities, in many communities there is the perception that this is so. This perception sometimes makes it more difficult to lease public housing units to the most desirable residents. Implementing appropriate and innovative anti-drug and crime reduction programs at prominent CMHA properties can both reduce actual crime as well as the perception of crime.

Security Support Officers

Currently, CMHA provides resident security through a combination of staff, contract and special agreement with the City of Columbus Police Department. The Safety and Crime Prevention Department is headed by a manager and employs three coordinators. These coordinators are assigned by geographic region and are responsible for investigating and following up on resident information reports that include complaints regarding potential criminal activities. They are also responsible for providing safety education to the residents and, as part of this effort, are working to establish Neighborhood Watch Programs at CMHA

properties. Finally, the crime coordinators work with the special duty police officers.

Six special duty police officers are provided to CMHA by a contract with the City of Columbus Police Department. They are available three days a week to provide special patrols, house checks, seek out drug activity, respond to calls from CMHA residents and issue criminal trespass citations when needed. They provide a wide variety of special services to CMHA and its residents. The services performed by these special duty police include:

- ▶ Provide immediate respond time when in CMHA communities
- ▶ Enforce no-trespassing orders
- ▶ Provide reports for safety hazards
- ▶ Provide personal contact to residents
- ▶ Provide special attention to drug areas complained of by residents
- ▶ Provide CMHA with crime information
- ▶ Provide surveillance and make arrests for crimes committed by residents, visitors and CMHA staff
- ▶ Exchange crime information with CMHA
- ▶ Attend resident, special safety and crime prevention and citizen meetings
- ▶ Provide community policing techniques

At this time, CMHA contracts with a security company to provide security guards at many of its high rise properties. These guards are stationed in the lobby areas and for the most part are unable to walk the buildings. Therefore, their primary activity has been access control through the main building entrance.

CHMA has been dissatisfied with the results of this initiative for a number of reasons:

- ▶ CMHA cannot directly supervise staff;
- ▶ Staff coverage is not always consistent -- different guards are assigned from day to day so one individual cannot become adequately familiar with the residents at a particular property;
- ▶ Guards cannot perform other duties to support building management; and
- ▶ Report writing skills are not adequate.

To address these concerns CMHA proposes to replace this contract and create the position of security support officer to provide both a crime prevention presence and management support at the high rises. Sixteen individuals will be hired, so that fourteen officers can be present two or three shifts per day at the following high rises:

- ▶ Sawyer Towers - Three shifts
- ▶ Worley Terrace - Two shifts
- ▶ Sunshine Terrace - Two shifts
- ▶ Sunshine Annex - Two shifts
- ▶ Taylor Tower - Three shifts
- ▶ Bollinger Tower - Two shifts

These staff security personnel will be hired to carry out a variety of duties including:

- ▶ Control building access -- including checking alternate entrances
- ▶ Walk the building hallways and parking lots on a regular schedule
- ▶ Deal with disturbances appropriately
- ▶ Escort residents to and from vehicles if required
- ▶ Issue "Notices to Resident" for inappropriate behavior
- ▶ Provide information and reports to building management for follow-up with problem residents
- ▶ Provide information and reports to City of Columbus Police Department for follow-up of suspected criminal activity.

Although these guards will be unarmed, CMHA will require appropriate peace officer training. Additional training in dispute resolution, negotiation and property management principles is also likely to be provided. The property management training will be important to enable the officers to provide a presence that will make the residents feel more secure and at the same time be an additional set of management eyes and ears. The officers will improve management effectiveness by carrying out these tasks:

- ▶ Issuing residents who habitually create problems for others a written "Notice" describing the problem and providing a copy to the manager for follow-up
- ▶ Identifying residents who need a referral for mental health or drug abuse treatment based on

their after-hours activities

- Getting to know the residents of the building to which the officer is consistently assigned
- Becoming familiar with the residents of their building in order to learn who belongs in the building and who doesn't
- Defusing potentially explosive situations and summoning Columbus City police when required

By accomplishing these tasks, the security support officers will help the site managers more effectively enforce the lease, identify residents in need of treatment, exclude trespassers from the building and discourage drug-related crime by their presence.

The crime coordinators will supervise the security support officers. A security manual is now being revised to fit the work these officers will do. Instruction in the manual will be a part of the staff training that CMHA will offer the new staff members.

Drug Abuse Prevention

Problem Statement

The drug prevention activities included in this plan are those that are designed to prevent involvement with illegal drugs by providing drug education programs that are coupled with other activities that give young people an opportunity to improve their academic performance and participate in recreational activities. Counseling will be offered to those who require more intensive programs. Education will give youth the knowledge they need to make decisions. The recreation gives them alternatives to getting in trouble. The counseling opportunities will provide intervention to those who require it.

Researchers have identified a number of risk factors that increase the potential for young people to engage in drug abuse. These factors include poverty, family management problems, academic failure beginning at a young age and community norms that are favorable to drug abuse. The Columbus Metropolitan Housing Authority has chosen activities that address all these risk factors- recreation, drug education, academic enrichment and family relationships.

For adults, the risk factors are much the same. Unemployment, lack of job skills, poor decision-making all lead to an increased risk of involvement with drugs. By programming job readiness, wellness, counseling and parenting programs, CMHA is giving adults an opportunity to develop skills that provide paths with alternatives to drug use and to more effectively divert their children from experiencing problems with drug abuse.

Youth Services

If the focus of CMHA's Drug Elimination Program is better security and lease enforcement for its high-rise properties, the focus shifts to providing increased services at its family developments. New services to be provided include on-site after-school programs for young people.

Latch Key Program

A latch key program will serve young people 13 and under. It will offer youngsters a safe place to go after school as well as a place to get help with homework. Recreational activities will also be offered. The latch key program will be open at a minimum from 3 to 5:30 p.m. daily. A computer center will be located at each site and available to latchkey participants. CMHA plans to use teachers from the Columbus City Schools on a contract basis to provide computer instruction several hours each week. A food program operated by the Ohio Hunger Task Force will serve hot meals to participants.

The Ohio Hunger Task Force will operate the latchkey programs at Poindexter Village, Lincoln Park, and Riverside/Bradley. They will hire people from the local community to staff the programs. The Sawyer Manor and Trevitt Heights latchkey site will be operated by the Neighborhood House, a local, community-based social service organization.

Latch key and meal programs are currently operated at several of CMHA's smaller family developments

such as Canonby Court, Eastmoor Square, Post Oak and Glenview. Expanding these programs to the four largest developments will enable nearly all of CMHA young people to have access to these services.

Teen Drop-In Center

Teen Drop-In Centers will also be operated at Poindexter Village, Lincoln Park, Riverside/Bradley, Sawyer Manor and Trevitt Heights. Like the latch key program, the teen drop-in center will provide an opportunity for participants to get help with homework and take part in recreational activities with others their own age. In addition to these services, the teen program will add the availability of counseling.

HRN Family Institute, under a contract with the Franklin County Department of Health already offers youth and family counseling on-site at Poindexter Village to those young people who are engaged in drug abuse or are exhibiting behavior that puts them at risk for such abuse. The counseling that is offered involves not only the young person, but includes work with his or her family. Using funds available under this grant, CMHA proposes to expand the HRN Counseling programs to provide on-site services at Lincoln Park and Riverside/Bradley.

HRN Family Institute is a non-profit, community-based organization that works with troubled teens and their families. In addition to the counseling services provided at Poindexter, HRN also runs a teen center whose staff conducts recreational activities as well as help with homework. This combined teen center and counseling concept will be expanded to two additional CMHA properties- Lincoln Park and Riverside/Bradley. Counseling will be available to any young person who seeks it, as well as to those referred to HRN. Staff will also endeavor to identify those youth who may be at risk for drug abuse. This combination of a drop-in center staffed by professionals who can recognize potential problems is a good one for working with teenagers. An additional Teen Center will be operated by Neighborhood House at Sawyer Manor for youth from Sawyer and Trevitt Heights.

All four Teen Drop-In Centers will serve students 14 and over and will be open daily from 5:30 until 7:30 p.m.

The computer center used by the latch key program will also be available to the teens. The instructors' time

will be scheduled so that they will be available during the drop-in center hours.

Recreation

The final part of the youth services program is recreation. Although CMHA does not have recreational facilities on-site at all developments, it is negotiating with City of Columbus Parks and Recreation staff to use nearby facilities. For CMHA youth, getting to organized sports activities has traditionally been a problem. CMHA will address this by contracting with the Columbus Metropolitan Area Community Action Organization (CMACOA) to provide transportation for CMHA youth to recreational facilities and events.

Funds will also be set aside to provide equipment and participation fees for young athletes who otherwise would not be able to take part in organized sports programs. Studies have shown that young people who engage in sports activities do better in school and have a lower incidence of drug use and other at risk behaviors.

The sports program will also include an initiative to establish at least one sports team at each of the family communities. These teams would participate in city leagues. CMHA maintenance union employees have agreed to act as coaches for these teams. No PHDEP funds would be used to support this activity unless participants required assistance to get the necessary equipment or to pay fees.

Youth Councils

As part of its program of resident involvement, CMHA is working to establish Youth Councils at each property. These councils will work as an adjunct to the adult Resident Council and endeavor to involve young residents in their community. Although not a formal part of the CMHA Drug Elimination program, as these Youth Councils grow in size and influence they will provide yet another activity for young people to take part in service to their community.

Adult Services

The availability of supportive services and alternative activities can help prevent young people from engaging in drug abuse. The same is true for adults -- the required services and activities are just different. For its adult residents, CMHA will provide counseling and referrals for drug treatment, recreation and wellness programs and peer support. The computer labs that are located on-site for the use of the latch key program and teen drop-in centers will also be available to the adults for job search and resume preparation activities. The teachers from the Columbus City Schools who work in the computer lab will also be available to teach computer skills to adults. Adult services will also be focused on Lincoln Park, Poindexter, Riverside/Bradley, Trevitt Heights and Sawyer Manor.

Counseling, Referral and Peer Support

CMHA will contract with NetCare Access to schedule appropriate hours at each of the four sites to provide assessments, counseling, confidential referrals for drug and/or alcohol treatment or mental health services to those residents in need of help. NetCare Access is a mental health organization funded by the Alcohol, Drug and Mental Health (ADAMH) Board to perform intake, assessment and placement for Franklin County. NetCare will also provide support groups on-site, if appropriate, or staff will refer residents to appropriate off-site groups.

NetCare will schedule approximately ten hours per week at each development. Office hours will be at the property site and the schedule will include non-traditional hours such as evening and weekends to accommodate a variety of resident schedules.

The counseling programs on-site at Poindexter Village, Riverside/Bradley and Lincoln Park as part of the youth program will also be available to adults as part of its family counseling orientation.

Recreation and Wellness

CMHA will contract with the Grant/Riverside Methodist Hospital of Columbus to present a Women's Wellness program at the four targeted family developments. The goal of the program is to provide women with the tools and skills they need to make good health decisions for themselves and their families. Programming will be determined after an assessment is made of the women, their families and their communities. However the program may include such components as:

- Education about high-risk health diseases
- Access to health and social service
- Women and alcohol resources and drugs
- Health care decisions for the family
- Stress management
- Domestic violence
- Nutrition
- Self-defense
- Exercise; and
- Health assessments, screening and referrals

The programs will be held on each of the four sites, with each site receiving four hours of programming each week. The program will be coordinated by a Registered Nurse employed by the hospital.

Job Training

The computer centers that have been established at each of the four family properties for use of the latch key and teen drop-in programs will also be available to adults for use in resume preparation, job search and computer skills enhancement. Instructor schedules will be built to accommodate adult use as well.

This program will complement a \$3.1 million Department of Labor-funded Welfare to Work initiative that began June 3. This award was made to the Columbus Urban League to provide job training, coaching, placement and support. CMHA is a partner in this initiative and eighty per cent of those enrolled in the program must be CMHA residents. Training will take place at the property sites. Case workers also located on site to work with participants. The trainees are placed in job where their salary is subsidized for eight weeks. The trainee is to move on to a full-time regular placement after this.

Equipment

Computer labs will be established at each of the four family communities. Computers and software for use in the computer labs will be purchased with funds from this grant. Computer tables and chairs will also be purchased as needed. CMHA Information Systems staff will work with Resident Services staff to develop specifications for the required equipment. Appropriate software will be identified and purchased.

Teachers from the Columbus City Schools will work as instructors in the labs. They will provide two-hour sessions twice a week at each site. The sessions will be scheduled so that at some time each of the groups- latch key, teen drop-in and adult job search are use them.

Grant Administration

Many of the programs planned for youth and adults are new ones. When all the initiatives set out in this grant application are implemented, there will be a significant number of new programs operating at CMHA sites. In order to adequately monitor these programs and evaluate their success, CMHA intends to add a Youth Initiatives Grant Coordinator to its Resident Services staff. This coordinator will be responsible for:

- Obtaining partnership agreements from each service provider;
- Establishing performance and evaluation criteria with each service provider;
- Ensuring compliance of service providers;
- Surveying resident participants in PHDEP funded activities to determine satisfaction;

- ▶ Evaluating the effectiveness of programs based on the criteria set out in the provider agreements and this grant application;
- ▶ Maintaining communication and good relationships with service providers;
- ▶ Networking in the community to identify new potential providers; and
- ▶ Working with providers and resident groups to identify new service needs.
- ▶ Coordinating and evaluating all youth services
- ▶ CMHA wishes to staff this position using PHDEP funds.

Resident Survey

Additionally, the Columbus Metropolitan Housing Authority will contract annually with an independent firm to survey its residents about their satisfaction with the Drug Elimination Program and its activities. The firm will develop surveys to be used with both youth and adults. Those residents who are participating in activities will be asked to evaluate those activities. Those who are not participating will be asked what services or activities are needed on site. The surveys will be performed annually and scheduled so that the results can be used to develop each year's drug elimination activities.

GOALS OF THE COLUMBUS METROPOLITAN HOUSING AUTHORITY DRUG ELIMINATION STRATEGY

The five-year goals to be achieved through the implementation of this program are:

Crime Prevention

Goal I. To reduce the impact of drug-related crime on the Columbus Metropolitan Housing Authority by effecting a long-term decrease of arrests and evictions for drug-related activities.

Objectives

I.1 To decrease arrests made in CMHA developments by 25%.

Annual Milestones

Year One:	NA
Year Two:	10% increase
Year Three:	5% decrease
Year Four	10% decrease
Year Five	10% decrease

Baseline Data: In 1998 there were 30 arrests in CMHA developments.

[Note: In the first year the new security support program will be implemented and may initially have little impact on crime. During the second year it is possible that increased attention will have the effect of increasing arrests. In the short term this can be favorable as long as arrests decrease in the long term.]

I.2 To decrease the number of evictions for drug-related activity by 50%.

Annual Milestones:

Year One	NA
Year Two	5% decrease
Year Three	15% decrease
Year Four	15% decrease
Year Five	10% decrease

Baseline Data: In 1998, 38 families were evicted for drug-related activities.

I.3 Increase to 50% of total hours those hours that security management personnel spend walking the building and surrounding property in comparison to hours spent sitting in the lobby.

Annual Milestones:

Year Two	Implement resident watch groups & building monitor program.
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Baseline Data: Fifty-percent of the time spent by management personnel will be allocated to walking the building and its surrounding areas as well as to perform other duties.

Drug Abuse Prevention

Goal II. To reduce the number of residents who engage in drug use.

II.1 To increase to 15%, the number of youth who regularly participate in after-school activities.

Annual Milestones:

Year One	NA
Year Two	6% participation
Year Three	9% participation
Year Four	12% participation
Year Five	15% participation

Baseline Data: Since this is the second year of new programs, we propose to continue to measure success by absolute participation. There will be 3% of young people participating in programs at this time.

We have chosen the 15 % participation rate at this time, but based on experience and the work of the Youth Initiatives Grant Coordinator CMHA may revise this in the future.

II.2 To increase to 15% of adult residents, the number of adults who participate in drug elimination activities.

Annual Milestones:

Year One	NA
Year Two	6% participation
Year Three	9% participation
Year Four	12% participation
Year Five	15% participation

Baseline Data: Since this is the second year of a new program we will continue to measure success by absolute participation. There will be 3% of adult residents participating in programs at this time. See also the note regarding baseline data for objective II.1.

It will be the job of the Youth Initiatives Grant Coordinator to develop appropriate performance indicators for CMHA's anti-drug programs. The authority will track the effect of the activities proposed in this submission on vandalism, unit turnover and occupancy rates as well as the more traditional participation rates. The authority will also work with service providers to identify appropriate evaluative criteria.

Section Three:
Drug Elimination Plan Budget

CRIME PREVENTION/ ON-SITE SECURITY STAFF

Program Description: The Columbus Metropolitan Housing Authority plans to establish a 16-person security contingent to provide crime prevention and lease enforcement services at six of CMHA's high-rise properties.

These officers will replace the failing contract security currently in place.

Funds Allocated: \$437,472

BUDGET ITEMS	PHDEP	OTHER
a. Personnel		
Security Officers	\$316,160	0
Total Personnel	\$316,160	0
b. Fringe		
Security Officers	\$121,312	0
Total Fringe	\$121,312	0
c. Travel		
None	0	0
d. Equipment		
None	0	0
e. Supplies		
None	0	0
f. Contractual		
None	0	0
g. Other		
None	0	0
h. Total Direct Costs	\$437,472	0

DRUG PREVENTION/ YOUTH SERVICES

Program Description: CMHA will institute a variety of on-site programs designed to provide alternative activities and drug counseling to young residents of CMHA. These offerings will include latchkey programs for those 13 and under and a teen drop-in center for older youth. Recreational activities will also be provided. Individual and family counseling will be available to those who need it.

Funds Allocated: \$263,090

BUDGET ITEMS	PHDEP	OTHER
a. Personnel		
None	0	0
b. Fringe		
None	0	0
c. Travel		
None	0	0
d. Equipment		
Resident Jackets for Patrol & Accessories	\$2,500	0
Total	\$2,500	0
e. Supplies		
Software	\$4,000	0
Sports equipment and fees	4,000	0
Total	8,000	0
f. Contractual		
HRN Family Institute	\$116,000	0
Ohio Hunger Task Force	109,550	0

CMACOA	20,000	0
Computer Training	7,040	0
Total	\$252,590	0
g. Other		
None	0	0
h. Total Direct Charges	\$263,090	0

DRUG PREVENTION/ ADULT SERVICES

Program Description: To complement the drug prevention youth programs being provided on-site, CMHA will also provide a variety of activities for adults. These will include counseling and support groups, computer-based resume and job search, and recreation and wellness programs.

Funds Allocated: \$123,046

BUDGET ITEMS	PHDEP	OTHER
Personnel		
None	0	0
b. Fringe		
None	0	0
c. Travel		
None	0	0
Equipment		
None	0	0
Supplies		
None	0	0
Contractual		
Grant/Riverside Hospital	\$83,046	0
NetCare Access	40,000	0

Total	\$123,046	0
Other		
None	0	0
h. Total Direct Charges	\$123,046	0

Resident Service Staff

Position/Grant Coordinator

Program Description: The Columbus Metropolitan Housing Authority will ensure the quality and coordination of its Drug Elimination Program by hiring a Youth Initiatives Grant Coordinator who will work within the Resident Services Department. This individual will be responsible for the coordination and evaluation of all programs as well as clear communication with service providers and other partners. Additionally, CMHA will contract with an outside firm to develop and conduct a resident survey.

Fund Allocation: \$44,709

BUDGET ITEM	PHDEP	OTHER
Personnel		
Grant Coordinator	\$30,632	0
Total	30,632	0
Fringes		
Grant Coordinator	\$8,577	0
Total	8,577	0
Travel		
None	0	0
Equipment		
None	0	0
Supplies		
None	0	0
Contractual		

Resident Survey	\$5,500	0
Total	5,500	
Other		
None	0	0
h. Total Direct Charge	\$44,709	0

Section Four:

TIME LINE

GRANT ADMINISTRATION

CMHA will provide administrative oversight of PHDEP program to include financial management and supervision of program.

Administration	\$91,283
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Section Five:
PARTNERS AND SUBCONTRACTORS

The Columbus Metropolitan Housing Authority has assembled an impressive array of subcontractors to help implement the anti-drug activities set out in this submission. These subcontractors can be added to the partnerships CMHA has previously established to enhance the quality of life for its residents.

Subcontractors

These organizations have agreed to act as subcontractor to implement drug elimination activities at CMHA.

Grant/Riverside Methodist Hospital

Grant/Riverside Methodist Hospital is one of the major hospitals in the City of Columbus. It has a history of providing outreach programs into the community. This effort to provide wellness services to the residents of Poindexter Village, Lincoln Park, Riverside/Bradley, Sawyer Manor and Trevitt Heights will build on that expertise. The hospital will provide a full-time registered nurse to coordinate the program. Teaching the women heads of hospital how to better care for the health of their families as well as themselves will enhance the ability of the whole community to avoid drug use and other high risk behaviors.

Columbus Metropolitan Area Community Action Organization

CMACOA is a non-profit community action organization that provides services primarily to the African-American community in Columbus. They run outreach programs to youth and adults. They also specialize in providing transportation to the elderly. CMACOA has agreed to provide transportation for CMHA youth who need assistance to allow participation in sports activities. CMACOA has provided this service to CMHA before. They provide a bus or van and a driver and work outside of the regular working day.

HRN Family Institute

Health Resources Network, also known as HRN Family Network will operate its Healthy Homes Youth Services for CMHA. HRN specializes in working with troubled teens and their families to keep young people out of the juvenile justice system whenever possible. HRN is a non-profit organization that works closely with the Franklin County Department of Health. The focus of their work is young people 13-18 years of age and their work is guided by the belief that to be effective, they must work with the entire family. HRN Family Institute will operate a teen drop in center and provide necessary counseling at Poindexter Village, Lincoln Park and Riverside/Bradley.

Ohio Hunger Task Force

The Task Force is a state and federally funded organization that provides meals to children of poor families. It will establish latch key and meal programs at Poindexter Village, Lincoln Park, and Riverside/Bradley. Staff for these programs will be hired from the community and will be supervised by the Task Force. Successful latch key programs are already operated by the Task Force at Eastmoor, Glenview, Post Oak and Canonby.

NetCare Access

NetCare Access is a mental health assessment organization funded by the Franklin County Alcohol, Drug and Mental Health Board (ADAMH). It functions as the gatekeeper organization for mental health and rehabilitation services for the county. NetCare will put staff at Poindexter Village, Sawyer Manor, Lincoln Park and Trevitt Heights to provide assessment. Counseling and referral services to CMHA residents.

PARTNERS

CMHA also works with other organizations to reduce drug use as well as to provide other services to its residents.

Neighborhood House

Neighborhood House is a community based organization that provides a number of programs in the community including Head Start and latch key programs for children and life skills training for adults. Neighborhood House partners with the housing authority to provide a latch key program and teen drop-in center for the youth at Sawyer Manor and Trevitt Heights.

Urban League

The Columbus Urban League has been awarded a \$3.1 million grant by the US Department of Labor to provide job training, placement and coaching services to individuals who have been on welfare. The housing authority collaborated in the preparation of the grant and by its terms, 80% of those served must be CMHA residents. Training and case management services are provided on site for the residents.

Other partners in non-drug elimination initiatives include:

- The Life Care Alliance for seniors
- ADAMH- 1/3 of CMHA residents have contact with the mental health system
- Head Start
- Community Housing Network
- YMCA
- 4H
- Boy Scouts of America

By working closely with so many community organizations the Columbus Metropolitan Housing Authority ensures that it stays informed about any activities that can benefit its residents. By maintaining relationships with many groups, the authority can ensure that the services it does provide are designed to be effective, are not duplicative and complement other, ongoing activities.

Section Six:

DRUG ELIMINATION PLAN SUMMARY

The Columbus Metropolitan Housing Authority has developed a strategy to reduce drug abuse and drug-related crime by implementing a new in-house security program and providing enhanced on-site services for residents. The new security program will replace and expand a contract security program now in place at CMHA's high-rise properties. The new program will increase coverage and responsiveness while providing support to management personnel. On-site services will include new educational and recreational opportunities for young people as well as access to counseling and treatment services for youth, adults and families when required.

Attachment G
SOCIAL SERVICE PROGRAMS BY COMMUNITIES
CMHA FAMILY COMMUNITIES

FAMILY COMMUNITY	COMMUNITY ACTIVITIES	SERVICE PROVIDERS	PENDING ACTIVITIES	SERVICE PROVIDERS FOR PENDING ACTIVITIES
CANONBY COURT	INOCULATIONS FROM THE HEALTH DEPT. COMPUTER CLASS FROM SOUTH PARK BLOCK WATCH BACK TO SCHOOL PARTY HAT AND GLOVE GIVE-A-WAY EASTER EGG HUNT SECRET SANTA (Zoo trips, Clippers game night, toy give-a-way) REFERRAL BROCHURES ON SITE (First Link) SUMMER FOOD PROGRAM PIC YOUTH PROGRAM COMPUTER CENTER	HEALTH DEPT. SOUTH PARK RESIDENT COUNCIL RESIDENT COUNCIL RESIDENT COUNCIL RESIDENT COUNCIL RESIDENT SERVICES RESIDENT SERVICES RESIDENT COUNCIL, OHIO HUNGER TASK FORCE RESIDENT COUNCIL, PIC CMHA	LATCHKEY PROGRAM SPORTS PROGRAM DOL GRANT SITE TEEN COUNCIL VISTA WORKER SITE	OHIO HUNGER TASK FORCE, YMCA, 4H, VARIOUS PUBLIC SCHOOLS LARRY GRIFFIN, CMHA, GREATER TABERNACLE CHURCH, PARK AND REC, COLUMBUS FOUNDATION URBAN LEAGUE RESIDENT COUNCIL VISTA, RESIDENT SERVICES, RESIDENT COUNCIL
FAMILY COMMUNITY	COMMUNITY ACTIVITIES	SERVICE PROVIDER	PENDING ACTIVITIES	SERVICE PROVIDER FOR PENDING ACTIVITIES
EASTMOOR SQUARE	CITY YEAR ANNUAL COMMUNITY CLEAN-UP	CITY YEAR, RESIDENT COUNCIL	DOL GRANT SITE SPORTS PROGRAM	URBAN LEAGUE

	<p>SECRET SANTA (Zoo trips, Clippers night, toy give-a-way)</p> <p>DRAMA</p> <p>REFERRAL BROCHURES ON SITE (First Link)</p> <p>SUMMER FOOD PROGRAM</p> <p>PIC YOUTH PROGRAM</p> <p>COMPUTER CENTER</p> <p>OUT DOOR CAMP</p> <p>KIDS'DAY</p> <p>ARGOSY TRIP</p> <p>SCHOOL SUPPLY GIVEAWAY</p> <p>YARD SALE</p> <p>TALENT SHOW</p> <p>HARVEST PARTY</p> <p>TURKEY RAFFLE</p> <p>CHRISTMAS PARTY</p>	<p>RESIDENT SERVICES</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT SERVICES</p> <p>OHIO HUNGER TASK FORCE, RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL, PIC</p> <p>CMHA</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p>	<p>LATCHKEY PROGRAM</p> <p>TEEN COUNCIL</p>	<p>LARRY GRIFFIN, GREATER TABERNACLE CHURCH, PARK AND REC, COLUMBUS FOUNDATION</p> <p>OHIO HUNGER TASK FORCE, YMCA, 4H, VARIOUS PUBLIC SCHOOLS, RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p>
FAMILY COMMUNITY	COMMUNITY ACTIVITIES	SERVICE PROVIDER	PENDING ACTIVITIES	SERVICE PROVIDER FOR PENDING ACTIVITIES
GLENVIEW ESTATES	<p>CHILDREN'S VALENTINE PARTY</p> <p>SECRET SANTA (Zoo trips, Clippers</p>	<p>RESIDENT COUNCIL</p> <p>RESIDENT SERVICES</p>	<p>DOL GRANT SITE</p> <p>SPORTS PROGRAM</p>	<p>URBAN LEAGUE</p> <p>LARRY GRIFFIN, GREATER TABERNACLE</p>

	<p><i>night, toy give-a-way)</i></p> <p>SUMMER FOOD PROGRAM</p> <p>PIC YOUTH PROGRAM</p> <p>REFERRAL BROCHURES ON SITE <i>(First Link)</i></p>	<p>RESIDENT COUNCIL, OHIO HUNGER TASK FORCE</p> <p>RESIDENT COUNCIL, PIC</p> <p>RESIDENT SERVICES</p>	<p>AFTER SCHOOL PROGRAM</p> <p>COMPUTER CENTER</p> <p>TEEN COUNCIL</p>	<p>CHURCH, PARK AND REC, COLUMBUS FOUNDATION</p> <p>OHIO HUNGER TASK FORCE, 4H, YMCA, VARIOUS PUBLIC SCHOOLS</p> <p>CMHA,</p> <p>RESIDENT COUNCIL</p>
<p>INDIAN MEADOWS <i>(Just completed construction, resident council pending)</i></p>			<p>REFORM RESIDENT COUNCIL</p> <p>COMPUTER CENTER</p> <p>DOL GRANT</p> <p>LATCHKEY PROGRAM</p>	<p>RESIDENT SERVICES</p> <p>CMHA</p> <p>URBAN LEAGUE</p> <p>OHIO HUNGER TASK FORCE</p>
FAMILY COMMUNITY	COMMUNITY ACTIVITIES	SERVICE PROVIDER	PENDING ACTIVITIES	SERVICE PROVIDER FOR PENDING ACTIVITIES
<p>KENMORE SQUARE <i>(No Resident Council)</i></p>			<p>FORM RESIDENT COUNCIL</p> <p>AFTER SCHOOL PROGRAM</p>	<p>RESIDENT SERVICES</p> <p>OHIO HUNGER TASK FORCE, 4H, YMCA,</p>

			DOL GRANT	VARIOUS PUBLIC SCHOOLS URBAN LEAGUE
LINCOLN PARK <i>(No Resident Council)</i>	ENGLISH LITERACY CLASSES SUMMER FOOD PROGRAM REFERRAL BROCHURES ON SITE <i>(First Link)</i> PIC YOUTH PROGRAM	CRIS RESIDENT COUNCIL (REEB HOSACK), OHIO HUNGER TASK FORCE RESIDENT SERVICES RESIDENT COUNCIL, PIC	REFORM RESIDENT COUNCIL DOL GRANT SITE LATCHKEY PROGRAM COMPUTER CENTER SPORTS PROGRAM TEEN COUNCIL PHDEP SITE	RESIDENT SERVICES URBAN LEAGUE OHIO HUNGER TASK FORCE, 4H, YMCA, VARIOUS PUBLIC SCHOOLS CMHA LARRY GRIFFIN, GREATER TABERNACLE CHURCH, PARK AND REC, COLUMBUS FOUNDATION RESIDENT COUNCIL **SEE BELOW
FAMILY COMMUNITY	COMMUNITY ACTIVITIES	SERVICE PROVIDER	PENDING ACTIVITIES	SERVICE PROVIDER FOR PENDING ACTIVITIES
OHIO TOWNHOUSES <i>(No Resident Council & No community space)</i>			ACQUIRE MEETING SPACE FOR COMMUNITY MEETINGS & PROGRAMS FORM RESIDENT COUNCIL	RESIDENT SERVICES RESIDENT SERVICES
POINDEXTER VILLAGE	OLDIES BUT GOODIES	RESIDENT COUNCIL	LATCHKEY	OHIO HUNGER TASK

	<p>NIGHT</p> <p>SECRET SANTA (Zoo trip, Clippers night, toy give-a-way)</p> <p>HEAD START</p> <p>TEEN PROGRAM</p> <p>COMPUTER CENTER</p> <p>YOUTH RECOGNITION CELEBRATION</p> <p>ENGLISH LITERACY CLASSES</p> <p>COVERED DISH DINNERS</p> <p>REFERRAL BROCHURES ON SITE (<i>First Link</i>)</p>	<p>RESIDENT SERVICES</p> <p>JOHN XXIII</p> <p>HRN COUNSELING</p> <p>CMHA & HRN COUNSELING</p> <p>RESIDENT COUNCIL & PROPERTY MANAGEMENT</p> <p>CRIS</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT SERVICES</p>	<p>PROGRAM</p> <p>DOL GRANT</p> <p>SPORTS PROGRAM</p> <p>TEEN COUNCIL</p> <p>PHDEP SITE</p> <p>SENIOR LUNCH PROGRAM</p> <p>WELLNESS CENTER</p>	<p>FORCE, 4H, YMCA, VARIOUS PUBLIC SCHOOLS</p> <p>URBAN LEAGUE</p> <p>LARRY GRIFFIN, GREATER TABERNACLE CHURCH, PARK AND REC, COLUMBUS FOUNDATION</p> <p>RESIDENT COUNCIL</p> <p>**SEE BELOW</p> <p>LIFECARE ALLIANCE</p> <p>LIFECARE ALLIANCE</p>
FAMILY COMMUNITY	COMMUNITY ACTIVITIES	SERVICE PROVIDER	PENDING ACTIVITIES	SERVICE PROVIDER FOR PENDING ACTIVITIES
POST OAK STATION	<p>TEEN COUNCIL</p> <p>DANCE CLASS</p> <p>AEROBIC CLASS</p> <p>EASTER EGG HUNT</p> <p>MOTHER DAY CEREMONY</p>	<p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p>	<p>LATCHKEY PROGRAM</p> <p>DOL GRANT</p> <p>SPORTS PROGRAM</p>	<p>OHIO HUNGER TASK FORCE, 4H, YMCA, SW PUBLIC SCHOOLS, COLUMBUS FOUNDATION (<i>Funding is Complete for equipment and staffing</i>)</p> <p>URBAN LEAGUE</p> <p>LARRY GRIFFIN, GREATER TABERNACLE CHURCH, PARK AND REC, COLUMBUS</p>

	YOUTH RECOGNITION CEREMONY TRIP TO WYANDOTTE LAKE FAMILY DAY GOSPEL FEST COMMUNITY THANKSGIVING DINNER COMMUNITY CHRISTMAS PARTY SECRET SANTA (Zoo trips, Clippers night, toy give-a-way) REFERRAL BROCHURES ON SITE (<i>First Link</i>) SUMMER FOOD PROGRAM PIC YOUTH PROGRAM	RESIDENT COUNCIL RESIDENT COUNCIL RESIDENT COUNCIL RESIDENT COUNCIL RESIDENT SERVICES RESIDENT SERVICES RESIDENT COUNCIL, OHIO HUNGER TASK FORCE RESIDENT COUNCIL, PIC	VISTA WORK SITE	FOUNDATION VISTA, RESIDENT SERVICES, RESIDENT COUNCIL
FAMILY COMMUNITY	COMMUNITY ACTIVITIES	SERVICE PROVIDER	PENDING ACTIVITIES	SERVICE PROVIDER FOR PENDING ACTIVITIES
REEB HOSAK	SECRET SANTA (Zoo trip, Clippers night, toy give-a-way) SUMMER FOOD PROGRAM PIC YOUTH PROGRAM	RESIDENT SERVICES RESIDENT COUNCIL, OHIO HUNGER TASK FORCE RESIDENT COUNCIL, PIC	COMPUTER CENTER DOL GRANT	CMHA URBAN LEAGUE
RIVERSIDE BRADLEY (<i>Resident Council has just reformed as of 7/21/99</i>)			COMPUTER CENTER SPORTS	CMHA LARRY GRIFFIN, GREATER CHURCH TABERNACLE, COLUMBUS FOUNDATION, PARK

			DOL GRANT PHDEP SITE	AND REC URBAN LEAGUE **SEE BELOW
FAMILY COMMUNITY	COMMUNITY ACTIVITIES	SERVICE PROVIDER	PROPOSED ACTIVITIES	SERVICE PROVIDER FOR PROPOSED ACTIVITIES
SAWYER MANOR TREVITT HEIGHTS <i>(Sawyer Manor under construction, no resident council)</i>	TEEN PROGRAM HEAD START & CHILD CARE	NEIGHBORHOOD HOUSE AT NEIGHBORHOOD HOUSE	FORM RESIDENT COUNCIL COMPUTER CENTER LATCHKEY PROGRAM DOL GRANT ENGLISH LITERACY CLASSES PHDEP SITE	RESIDENT SERVICES CMHA OHIO HUNGER TASK FORCE, RESIDENT COUNCIL, & NEIGHBORHOOD HOUSE URBAN LEAGUE CRIS **SEE BELOW
THORNWOOD COMMONS <i>(No resident council)</i>			FORM RESIDENT COUNCIL LATCHKEY	RESIDENT SERVICES OHIO HUNGER TASK

			PROGRAM DOL GRANT	FORCE URBAN LEAGUE
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**PHDEP GRANT

PROPOSAL INCLUDES THE FOLLOWING SERVICES: LATCHKEY FUNDING; TEEN PROGRAM FUNDING; SPORTS PROGRAM FUNDING; ADULT SOCIALIZATION & LIFE SKILL FUNDING; AOD SERVICES, CASE MANAGEMENT, INDIVIDUAL, FAMILY AND GROUP COUNSELING SERVICES; AND CREATION OF COMPUTER CENTERS WITH TRAINING FOR YOUTH AND ADULTS.

PENDING ACTIVITIES FOR ALL COMMUNITIES

- Eligibility worker from Department of Human Services
- Free Computer Software from First Link (*Software received, not yet distributed*)
- IDA program with CHP, CMAAO, Compact, and Legal Aid (*waiting on response from several funding sources*).
- Women support group with Beverly Frierson from Columbus Aids Task Force.
 - Boy Scouts
 - Pregnancy services from Concord
- Drop in center for Job Source and resumes from the Work Source (*computers procured, still waiting for ISP and word processing software*).
- Expansion of partnership with Columbus State for job preparation, education, job placement, vocational training, etc.

CONTINUOUS ACTIVITIES

- Newsletters containing information regarding job information, job fair, job preparation, job education, work source, health, education, grants, scholarships, child care, and community activities.

Attachment G

CMHA SENIOR COMMUNITIES

SENIOR COMMUNITY	COMMUNITY ACTIVITIES	SERVICE PROVIDERS	PENDING ACTIVITIES	SERVICE PROVIDERS FOR PENDING ACTIVITIES
<u>BOLLINGER</u> (COUNCIL INACTIVE)	CONGREGATE MEALS BUILDING MONITOR ON SITE LAUNDRY	LIFECARE ALLIANCE CMHA COINMACH	24 HOUR SECURITY	PHDEP GRANT

<u>JENKINS TERRACE</u>	<p>BINGO</p> <p>BANKING SERVICES</p> <p>BIBLE STUDY</p> <p>MONTHLY POTLUCK</p> <p>TRANSPORT</p> <p>HEALTH NURSE</p> <p>SANTA CALLS</p> <p>HALL MONITORS ANNUAL DINNER</p> <p>ANNUAL DINNER</p> <p>ANNUAL DINNER</p> <p>CHRISTMAS & THANKSGIVING DINNER</p> <p>ANNUAL TRIPS</p> <p>BOLTON FIELD PICNIC</p> <p>RECREATION</p> <p>CARE CALLERS</p>	<p>RESIDENT COUNCIL</p> <p>BANK ONE</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>CMACAO</p> <p>LIFECARE ALLIANCE</p> <p>NATIONWIDE INSURANCE</p> <p>RESIDENT COUNCIL</p> <p>MT. ZION BAPTIST CHURCH</p> <p>BLACK POLICEMAN</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>REC. & PARK</p> <p>CMHA</p>	<p>FITNESS CENTER</p> <p>ON SITE REFERRAL SERVICE</p> <p>WEEKEND SOCIAL ACTIVITY</p> <p>EXPANSION OF HEALTHCARE</p> <p>BOOKMOBILE</p> <p>COMPETITIVE GAMES</p> <p>DRAMA</p> <p>ARTS & CRAFTS</p> <p>CERAMICS</p> <p>24 HOUR SECURITY</p>	<p>YMCA</p> <p>ED/SS GRANT</p> <p>COUNCIL</p> <p>ED/SS GRANT</p> <p>FRANKLIN COUNTY LIBRARY</p> <p>COUNCIL RESIDENT SERVICES</p> <p>REC. & PARKS</p> <p>REC. & PARKS</p> <p>REC. & PARKS</p> <p>PHDEP GRANT</p>

	MEALS LAUNDRY SITE HARMONY BALL BREAD DELIVERY	LIFECARE COINMACH COUNCIL KROGER		
<u>MAPLEWOOD HEIGHTS</u>	ANNUAL TRIPS ARTS & CRAFTS MONTHLY SHOPPING TRIP BOLTON FIELD PICNIC HARMONY BALL HOLIDAY TRIPS CARE CALLERS WELLNESS NURSE ON SITE LAUNDRY CONGREGATE MEALS	COUNCIL COUNCIL COUNCIL COUNCIL COUNCIL COUNCIL CMHA LIFECARE ALLIANCE COINMACH LAUNDRY LIFECARE ALLIANCE	HEALTH FAIRS WELLNESS CENTER EXPANSION OF HEALTH CARE ACCESSIBLE TRANSPORT ON SITE REFERRAL SERVICES GREATER SOCIAL ACTIVITIES	COLUMBUS HEALTH DEPT. LIFECARE ALLIANCE COLUMBUS HEALTH DEPT. ED/SS GRANT ED/SS GRANT RESIDENT SERVICES

<u>MARION SQUARE</u>	CONGREGATE MEALS WELLNESS CENTER FINANCIAL SUPPORT	LIFECARE ALLIANCE LIFECARE ALLIANCE LIFECARE	HEALTH FAIRS BUS TRANSPORT EXPANSION OF HEALTH CARE	COLUMBUS HEALTH DEPT. COTA ED/SS GRANT
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	<p>ON SITE LAUNDRY</p> <p>ANNUAL TRIPS</p> <p>TRANSPORT</p> <p>HOLIDAY MEALS & TRIPS</p> <p>BOLTON FIELD PICNIC</p> <p>HARMONY BALL</p>	<p>ALLIANCE</p> <p>CRANE PLASTICS</p> <p>COINMACH LAUNDRY</p> <p>COUNCIL</p> <p>CMACAO</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p>	<p>SECURITY</p> <p>ACCESSIBLE TRANSPORT</p>	<p>PHDEP GRANT</p> <p>ED/SS GRANT</p>
<p><u>SAWYER TOWERS</u></p>	<p>BEAUTY SHOP</p> <p>BANKING</p> <p>MENTAL HEALTH SERVICES</p> <p>ON SITE LAUNDRY</p> <p>THRIFT SHOP</p> <p>TRANSPORT</p> <p>CONGREGATE MEALS</p> <p>BINGO</p> <p>BIBLE STUDY</p> <p>HALL MONITORS</p> <p>ANNUAL TRIPS</p> <p>BREAKFAST</p> <p>LIBRARY</p> <p>BREAD DELIVERY</p> <p>BOLTON FIELD PICNIC</p> <p>HARMONY BALL</p>	<p>PRIVATE PROVIDER</p> <p>BANK ONE</p> <p>COLUMBUS AREA COMM. MENTAL HEALTH</p> <p>COINMACH LAUNDRY</p> <p>COUNCIL</p> <p>ST. STEVENS & CMACAO</p> <p>LIFECARE ALLIANCE</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>CMHA</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>KROGER</p> <p>COUNCIL</p>	<p>FITNESS CENTER</p> <p>ON SITE REFERRAL</p> <p>EXPANSION OF CARE CALLER SERVICES</p> <p>WEEKEND SOCIAL ACTIVITIES</p> <p>EXPANSION OF HEALTH CARE</p> <p>BOOK MOBILE</p> <p>COMPETITIVE GAMES</p> <p>DRAMA</p> <p>ARTS. & CRAFTS**</p> <p>CERAMICS</p> <p>WELLNESS PROGRAM</p> <p>HEALTH FAIR</p> <p>SUPPORTIVE SERVICE</p> <p>EXPANDED SECURITY</p> <p>COMMUNITY HEALTH</p>	<p>YMCA</p> <p>ED/SS GRANT</p> <p>CMHA</p> <p>SELF/CMHA</p> <p>ED/SS GRANT</p> <p>COLUMBUS LIBRARY</p> <p>COUNCIL RESIDENT SERVICES</p> <p>REC. & PARKS</p> <p>REC. & PARKS</p> <p>REC. & PARKS</p> <p>YMCA</p> <p>COLUMBUS HEALTH DEPT.</p> <p>COAAA</p>

	HOLIDAY DINNERS & TRIPS	COUNCIL COUNCIL	CENTER	PHDEP GRANT COLUMBUS HEALTH DEPT.
<u>SUNSHINE TERRACE AND ANNEX</u>	CONGREGATE MEALS ON SITE LAUNDRY TRANSPORT CONGREGATE HOUSING SERVICES PROGRAM MENTAL HEALTH SERVICES RECREATION WELLNESS CENTER BUILDING MONITOR SHOPPING SECURITY BINGO BIBLE STUDY MOVIE NIGHT ANNUAL TRIPS HOLIDAY MEALS BAKE/GARAGE SALES CARD GAMES BOLTON AIR FIELD PICNIC HARMONY BALL	GLADDEN COMMUNITY HOUSE COINMACH LAUNDRY CMACAO CENTRAL OHIO AREA AGENCY ON AGING NORTH CENTRAL MENTAL HEALTH REC. & PARKS LIFECARE CMHA PRIVATE PROVIDER CMHA COUNCIL COUNCIL COUNCIL COUNCIL COUNCIL COUNCIL COUNCIL COUNCIL COUNCIL COUNCIL	RESIDENT FITNESS CTR. ON SITE REFERRAL SERVICES WEEKEND SOCIAL ACTIVITY EXPANDED HEALTH CARE BOOK MOBILE DRAMA DANCE CLASS ARTS & CRAFTS ACCESSIBLE TRANSPORT HEALTH FAIRS INCREASED SECURITY	YMCA ED/SS GRANT RESIDENT SERVICES ED/SS GRANT COLUMBUS LIBRARY REC. & PARKS REC. & PARKS REC. & PARKS ED/SS GRANT COLUMBUS HEALTH DEPT. PHDEP GRANT
<u>TAYLOR TERRACE</u>	CONGREGATE MEALS	LIFECARE ALLIANCE	FITNESS CTR. EXPANSION CARE	YMCA CMHA

	<p>TRANSPORT</p> <p>WELLNESS NURSE</p> <p>BUILDING MONITOR</p> <p>ON SITE LAUNDRY</p> <p>SECURITY</p> <p>BINGO</p> <p>MOVIE NIGHT</p> <p>BIBLE STUDY</p> <p>WEEKLY RESIDENTS DINNER</p> <p>BOLTON FIELD PICNIC</p> <p>HARMONY BALL</p> <p>HOLIDAY MEALS & CELEBRATIONS</p>	<p>CMACAO</p> <p>LIFECARE ALLIANCE</p> <p>CMHA</p> <p>COINMACH LAUNDRY</p> <p>CMHA</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p>	<p>CALLERS</p> <p>BOOK MOBILE</p> <p>COMPETITIVE GAMES</p>	<p>COLUMBUS LIBRARY</p> <p>COUNCIL RESIDENT SERVICES</p>
<u>WORLEY TERRACE</u>	<p>MENTAL HEALTH SERVICES</p> <p>WELLNESS NURSE</p> <p>BUILDING MONITOR</p> <p>SECURITY</p> <p>ON SITE LAUNDRY</p> <p>BIBLE STUDY</p> <p>COFFEE SHOP</p> <p>ANNUAL TRIPS</p> <p>BAKE/GARAGE SALES</p> <p>CRIME NIGHT OUT</p> <p>ICE CREAM SOCIAL</p> <p>HOLIDAY CELEBRATIONS</p>	<p>NORTH CENTRAL MENTAL HEALTH</p> <p>LIFECARE</p> <p>CMHA</p> <p>CMHA</p> <p>COINMACH LAUNDRY</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p>	<p>FITNESS CTR.</p> <p>ON SITE REFERRAL SERVICE</p> <p>EXPANSION CARE CALLERS</p> <p>MORE SOCIAL ACTIVITIES</p> <p>BOOK MOBILE</p> <p>COMPETITIVE GAMES</p> <p>EXPANDED HEALTH CARE</p> <p>ACCESSIBLE TRANSPORT</p> <p>24 HOUR SECURITY</p>	<p>YMCA</p> <p>ED/SS GRANT</p> <p>CMHA</p> <p>COUNCIL/ RESIDENT SERVICES</p> <p>COLUMBUS LIBRARY</p> <p>COUNCIL RESIDENT SERVICES</p> <p>COLUMBUS HEALTH DEPT.</p> <p>ED/SS GRANT</p> <p>PHDEP GRANT</p>

	ARTS & CRAFTS	COUNCIL		
	BOLTON FIELD PICNIC			
	HARMONY BALL			
	SANTA CALLS	COUNCIL		
	CARE CALLERS	COUNCIL		
		NATIONWIDE INSURANCE		
		CMHA		

CONTINUOUS ACTIVITIES:

MONTHLY NEWSLETTERS CONTAINING HEALTH, EDUCATION, AND COMMUNITY OPPORTUNITIES AND ACTIVITIES.

COLUMBUS METROPOLITAN HOUSING AUTHORITY

SECTION 8 ADMINISTRATIVE PLAN

RENTAL CERTIFICATE AND HOUSING VOUCHER PROGRAMS

Adopted by the CMHA Board of Commissioners on November 19, 1999

**COLUMBUS METROPOLITAN HOUSING AUTHORITY
SECTION 8 ADMINISTRATIVE PLAN
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I. STATEMENT OF LOCAL POLICIES AND OBJECTIVES

The Section 8 Program was created by the Housing and Community Development Act of 1974 and further amended by federal legislation. Administration of the Housing Programs and the functions and responsibilities of the PHA staff will be in compliance with the Personnel Policy of the PHA, the Equal Opportunity Plan, and by this Administrative Plan. All Federal, State, and local housing laws will be followed.

A. PURPOSE OF THE PLAN

The overall plan for the Section 8 Existing Program is designed to achieve four major objectives:

2. To provide improved living conditions for low-income families while maintaining their rent payments at an affordable level;
3. To promote freedom of housing choice and spatial de- concentration of lower income and minority families;
4. To provide decently housing for eligible participants;
5. To provide an incentive to private property owners to rent to low income families by offering timely assistance payments and protection against unpaid rent.

The purpose of this Administrative Plan is to establish local policies for the administration of the Section 8 Existing Certificate and Housing Voucher Programs in accordance with HUD requirements.

The Plan covers both admission and continued participation in these programs. Policies are the same for both programs, unless otherwise noted.

Changes to the Plan will be approved by the PHA_s Board of Commissioners.

The PHA is responsible for complying with all subsequent changes in HUD regulations pertaining to these programs. If such changes conflict with this Plan, HUD regulations will have precedence.

B. LEGAL JURISDICTION

The legal jurisdiction for the operation of the Section 8 Program for the Columbus Metropolitan Housing Authority is Franklin County, Ohio.

C. PRIVACY RIGHTS AND RELEASE OF INFORMATION

The PHA recognizes that the right of privacy must be afforded to all Section 8 applicants and participants. Therefore, disclosure of any information maintained by the PHA will be restricted unless a blanket release of information is executed by the applicant or participant which releases the PHA from any claims. The PHA may share applicant and participant information with the appropriate federal agencies in the course of conducting official agency business.

In accordance with HUD regulations, the PHA will provide upon a prospective landlord's request, the family's current address and their current landlord's address and telephone number and the family's previous address and their previous landlord's address and telephone number from PHA records if they are available. The PHA will not be held responsible for any inaccurate information obtained from the family's file. No further information about the family will be provided unless the family gives the prospective landlord their written consent to review the information collected by the PHA. The PHA also reserves the right to verify that the person(s) requesting the information is an actual prospective landlord and may request the landlord to release the PHA from any claims. The PHA may assess a fee for all records photocopied and/or the time spent to obtain the information from the PHA's computerized data system.

Information concerning the PHA's participating Section 8 landlords may be obtained upon written request. The PHA may assess a fee for all records photocopied and/or the time spent to obtain the information from the PHA's computerized data system.

All other requests for the release of information about the Section 8 Program and the PHA's administrative records and documents will be subject to approval by the PHA pursuant to federal and State law.

D. DESCRIPTION OF PROGRAMS OFFERED

The PHA operates the following programs:

1. Public Housing (The PHA owns and operates the housing under this program);
2. Section 8 Rental Certificate Program;
3. Housing Voucher Program;
4. Section 8 Moderate Rehabilitation Program;
5. Shelter Plus Care Program.

II. EQUAL OPPORTUNITY HOUSING PLAN

A. PURPOSE

The Columbus Metropolitan Housing Authority Equal Opportunity Housing Plan fulfills the requirements outlined in 24 CFR § 982.53 of the HUD regulations governing the Existing Certificate, Housing Voucher, Moderate Rehabilitation, and Shelter Plus Care Programs.

B. SEVERABILITY

Any part of the Equal Opportunity Housing Plan found to be in conflict with the statutes or regulations governing these programs shall be void and does not affect the remaining operable parts of this Plan.

OBJECTIVE I - OUTREACH TO LOWER INCOME FAMILIES

A. POLICY

It is the PHA's policy to provide the widest possible dissemination of information to low-income families regarding the availability of Section 8 Housing Assistance in order to maximize safe affordable housing opportunities for eligible families who reside in Franklin County.

B. METHOD

The PHA's Section 8 Program is widely known in the Columbus area. The PHA uses local and general circulation newspapers to announce when the PHA is accepting applications for Section 8 Assistance. The PHA places advertisements in these newspapers which will at a minimum contain the following information:

1. Description of the Section 8 Program;
2. Definition of Eligibility;
3. Time and location of applications to be accepted and the deadline for making an application;
4. Telephone number and contact person for further information about the Program.

The PHA will also make notices available to local social service agencies, local radio and television stations and other agencies who provide services to low-income families in Franklin County.

The PHA also responds to telephone calls from interested families who are seeking information about the Program.

OBJECTIVE II - PROMOTING GREATER HOUSING OPPORTUNITIES FOR FAMILIES OUTSIDE AREAS OF LOW-INCOME AND MINORITY CONCENTRATION POLICY

It is the policy of the PHA to make Section 8 Program information available to all owners and managers of decent and affordable housing in Franklin County and to encourage current participating Section 8 owners and managers to continue to provide quality housing to the PHA's Section 8 families.

A. POLICY IMPLEMENTATION

The PHA conducts a comprehensive marketing program to broaden housing opportunities for low-income families who are assisted by the PHA's Section 8 Program. Efforts to educate owners and promote the PHA's Section 8 Program involves the following:

1. a quarterly Section 8 landlord newsletter;
2. working meetings and seminars with landlords to explain Section 8 regulations and PHA policies;
3. the development of Program marketing publications;
4. customer service training for the PHA's Section 8 staff;
5. active recruitment of units by the staff.

Use of exception rent schedules for up to 120% of the Fair Market Rents for non-central city geographic areas and use of Over FMR tenancies for other areas.

To aid Program participants, the PHA has developed a list of available vacant units by location, bedrooms, and housing type (duplex, single family, etc.). This list is updated monthly as owners inform the PHA that their units are available for Section 8 families. This list is made available to Section 8 participants upon request.

Nothing in this Section shall be construed to violate the "finders- keepers" policy and the non-steering provisions of the tenant-based Section 8 Program.

OBJECTIVE III - ENSURING EQUAL OPPORTUNITY TO APPLICANTS FOR PARTICIPATION IN THE PHA'S RENTAL CERTIFICATE, HOUSING VOUCHER, AND MODERATE REHABILITATION PROGRAMS POLICY

The PHA shall select families for participation without regard to an applicant's age, race, color, gender, familial status, creed, religion, disability, or national origin.

A. ADMINISTRATIVE PROCEDURES

The PHA's selection process is outlined in Sections IV, V, VI, and VII of this Plan and conforms to current HUD regulations. The PHA ranks the applications by local preferences and by application date without regard to the applicant's bedroom size. Preference priorities may be revised in accordance with changing federal regulations. The PHA takes applicants from the waiting list whenever Section 8 funds are available to enter into additional housing assistance contracts.

When a family applies for the Section 8 Program, the family is also listed on the Moderate Rehabilitation Program waiting list. Families who are near the top of the Moderate Rehabilitation waiting list are notified and referred to Moderate Rehabilitation owners who have vacant units. If the owner cannot approve a suitable family referred by the PHA, the owner is permitted to find a family of his/her choice and refer the family to the PHA to lease the vacant unit. The owner's referred family must meet HUD and PHA income and family composition eligibility regulations. The PHA advises Moderate Rehabilitation owners of their obligation to assist families referred from the PHA's waiting list before renting to non-waiting list families. The PHA monitors owners' good faith efforts to rent to a waiting list family before renting to a non-waiting list family.

The Section 8 waiting list is constantly updated by the PHA. Updating is accomplished by mailing "still interested" cards to applicants and by notifying applicants to update and verify information furnished to the PHA. Applicants who fail to return "still interested" cards to the PHA or refuse or fail to provide updated information are removed from the Section 8 waiting lists.

OBJECTIVE IV - SERVICES AND ASSISTANCE TO FAMILIES WHO HAVE ALLEGED THEY HAVE ENCOUNTERED DISCRIMINATION DURING THEIR HOUSING SEARCH

A. POLICIES AND PROCEDURES

Information on fair housing laws is provided to all Section 8 participants at group or one-on-

one briefings. The HUD-903 Form is given to all families at their briefing with instructions to contact the PHA in the event that the family has reason to believe that they have been illegally denied housing. The PHA will assist families in completing the form and refer families to the Columbus HUD Office for further investigation.

Families will also be referred to the Columbus Urban League and/or the Legal Aid Society of Columbus. Both agencies investigate fair housing complaints.

The PHA will also make available to families alleging discrimination a list of vacant units whose owners are willing to rent to Certificate or Voucher holders. Moderate Rehabilitation families will be referred to other Moderate Rehabilitation owners if other vacant units are available.

OBJECTIVE V - UTILIZATION OF LOCAL FAIR HOUSING AGENCIES

As stated above, the PHA will refer any family who has a fair housing complaint to the Columbus Urban League, the Legal Aid Society of Columbus, or such other agencies designated by HUD. The PHA will cooperate with these agencies in their investigation of the family's complaint.

Advice and assistance will be offered to disabled families as necessary in accordance with federal, State, and local law. The PHA will offer reasonable accommodation in the administration of the Section 8 policies and in giving assistance to disabled families to finding affordable and decent housing and complying with HUD and PHA regulations and policies.

OBJECTIVE VI - EQUAL OPPORTUNITY IN THE PHA'S EMPLOYMENT PRACTICES

The PHA is an equal opportunity employer who has established policies and practices which assure equal opportunity to all employees and applicants without regard to race, color, creed, religion, gender, disability, or national origin.

OBJECTIVE VII - EQUAL OPPORTUNITY FOR PERSONS WITH DISABILITIES

Qualified persons with disabilities solely by reason of their disabilities must not be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Section 504 requires Section 8 agencies to affirmatively ensure that persons with disabilities are given an equal opportunity to participate in the Section 8 Program. HUD's

Section 504 regulations, which are contained in 24CFR 8(Subpart A-E) provide a more detailed explanation of Section 8 responsibilities.

A qualified person with a disability:

- Must be afforded an opportunity equal to that afforded others, and/or;
- Must be provided housing or benefits as effective as those afforded to others, and/or;
- May not be provided different or separate housing or benefits unless necessary to provide with a person with a disability with housing or benefits that are as effective as those provided to others.

The PHA will afford persons with disabilities an equal opportunity to gain the same benefit, or to reach the same level of achievement as those who do not have disabilities.

The PHA is obligated to administer the tenant-based assistance program in the most integrated setting possible that is appropriate to the needs of qualified persons rather than to separate the person from the general population.

In any case, a person with a disability must ask for an accommodation of their disability before the PHA treats them differently.

III. ELIGIBILITY FOR ADMISSION

To be eligible for admission, an applicant must meet HUD's criteria for eligibility and any additional criteria established by the PHA in compliance with federal regulations.

HUD has established the following factors to determine eligibility:

1. Family Composition;
2. Income Limits;
3. Provision of Social Security Numbers;
4. Other Criteria for Admission which Relates to Prior History on the PHA_s housing programs.

The Family's initial eligibility for placement on the waiting list will be made in accordance with the following factors:

A. FAMILY COMPOSITION

The applicant must qualify as a Family. A Family may be:

1. A single person or group of single persons:
 - A. A single person may be one of the following:
 - An elderly person (see definition below);
 - A disabled person (see definition below);
 - A displaced person (see definition below);
 - Any other single person.
2. A single person, a married couple, or two persons who will live regularly together in the same dwelling unit with a child or children.
3. A group of persons consisting of two or more elderly or disabled persons living together or one or more elderly or disabled persons living with one or more live-in aides.
4. An elderly and/or disabled household whose head or spouse meets the following definition where the household head or spouse must be:
 - 62 years of age; or
 - Handicapped with a physical impairment which is expected to be of long

continued and indefinite duration, but does not prohibit independent living and is of such nature that the ability could be improved by more suitable housing conditions; or

- Disabled pursuant to Section 223 of the Social Security Act or Section 102 of the Developmentally Disabled Act.

8. An expectant mother unless she aborts prior to admission. If she aborts prior to admission, she will be classified as a single person.
9. A remaining member of a family assisted by the PHA's Section 8 Program.
10. A person displaced by governmental action, or a person whose dwelling has been extensively destroyed as a result of a disaster declared or otherwise formally recognized under federal disaster relief laws.

Head of Household:

The head of household is the person who assumes legal responsibility for the household and is listed on the application.

A family may not designate an elderly family member as head of household solely to qualify the family as an Elderly Household. There can be a co-head if the adult members are not married and both claim to assume joint legal responsibility for the household and are listed on the application as co-head.

Live-In Attendants:

A Family may include a live-in attendant who:

1. Has been determined by the PHA to be essential to the care and well being of the elderly, handicapped or disabled family member;
2. Is not obligated for the support of the elderly, handicapped or disabled member;
3. Would not be living in the unit except to provide care of the elderly, handicapped or disabled family member;
4. Whose income will not be counted for purposes of determining eligibility or rent.

Relatives are not automatically excluded from being care attendants, but must meet the definition described above.

A live-in attendant with a child is not qualified as a live-in attendant, since the child is not needed to attend the elderly, handicapped or disabled individual, unless the child meets the family definition.

Live-in attendants cannot be the remaining member of the tenant's family if the person they are attending is no longer a participant on the Section 8 Existing Housing Program. To determine whether a live-in attendant is "essential to the care and well being of the elderly, handicapped or disabled person," the PHA will send a third party verification request to a reliable medical source familiar with the applicant. The letter will request exact information on the services the live-in attendant needs to justify why the live-in attendant is medically necessary.

B. INCOME LIMITATIONS

The annual income of applicants shall not exceed income limits as established by HUD.

A family is eligible if their annual income does not exceed the income limits as established by HUD or if the family:

1. Is "continuously assisted" under the 1937 Housing Act. CFR part 511;
2. Is a low-income non-purchasing family residing in a HOPE 1 or HOPE 2 project;
3. Is a low-income non-purchasing family residing in a project subject to home ownership;
4. Is a low-income family displaced as a result of the prepayment of a mortgage or voluntary termination of a mortgage insurance contract under 24 CFR 165;
5. (For certificate program only) Is residing in a HUD-owned multi-family rental housing project when HUD sells, forecloses, or demolishes the project.

"Continuously assisted" means that the family is already receiving assistance under any 1937 Housing Act Program when the family is admitted to the certificate or voucher program. There may be a brief interruption of assistance under these programs and the admission to the certificate or voucher program. To be eligible under the category of "continuously assisted," the interruption of assistance cannot be greater than 90 days and the circumstances for the termination of housing assistance under the 1937 Housing Act must have been beyond the control of the family.

The applicable income limit for admission is the income limit for the area in which the family initially leases a unit and first becomes a Section 8 participant.

C. MANDATORY SOCIAL SECURITY NUMBERS

Families are required to provide Social Security Numbers for all family members age six and older prior to admission if they have been issued a number by the Social Security Administration.

All members of the family must:

1. provide their Social Security Number; or
2. Provide written certification that they have not been assigned a Social Security Number. If the individual is under 18, the certification must be executed by his or her parent or guardian. If the participant who has signed a certification form obtains a Social Security Number, it must be disclosed at the next regularly scheduled income reexamination.

If an applicant or tenant cannot provide his or her Social Security card, other documents listed below showing his or her Social Security Number may be used for verification. He or she may be required by the PHA to provide one or more of the following alternative documents:

1. Identification card issued by a federal, state or local agency;
2. Identification card issued by an employer or trade union;
3. Identification card issued by a medical insurance company;
4. Earnings statements or payroll stubs;
5. Bank statements;
6. IRS Form 1099;
7. Benefit Award letters from government agencies;
8. Unemployment benefit letter;
9. Retirement benefit letter;
10. Life insurance policies;
11. Court records such as real estate, tax notices, marriage, divorce, judgement, or bankruptcy records.

If the PHA verifies Social Security benefits with the Social Security Administration, the acceptance of the Social Security Number by the Social Security Administration will be considered documentation of its validity.

Applicants may not become participants until the Social Security Number documentation is provided. The applicant will retain their position on the waiting list for a period of not greater than 60 days.

New family members over 5 years of age will be required to verify (or certify, as applicable) their Social Security information when the change in family composition is reported by the family, whether that be at an annual or interim reexamination.

D. OTHER CRITERIA FOR ADMISSION

Other criteria must be met for an applicant to be eligible for assistance under the PHA Section 8 Program:

- The family must have paid any outstanding debt owed the PHA or another PHA on any previous tenancy for Public Housing or Section 8 Existing. No Repayment Agreement will be accepted. The family must repay in full in order to be considered eligible for admission.
- The family must have left any previous tenancy under the Section 8 Program without being in violation of a family obligation under its Certificate of Family Participation or Housing Voucher.
- The family must not have engaged in drug-related criminal activity or violent criminal activity, including criminal activity by any Family member.

Drug-related criminal activity means:

- The illegal manufacture, sale or distribution, or the possession with intent to manufacture, sell or distribute, a controlled substance (as defined in the Controlled Substance Act);
- The illegal use or possession (other than with intent to manufacture, sell or distribute), of a controlled substance, except that such use or possession must have occurred within one year before the date that the PHA provides notice to an applicant or participant of the PHA's determination to deny admission or terminate assistance;
- Drug related criminal activity does not include the use or possession if the family member can demonstrate that s/he:
 - a. Has an addiction to a controlled substance, has a record of such impairment, or is regarded as having such an impairment;
 - b. Is recovering or has recovered from such addiction and does not currently use or possess controlled substances.

Violent criminal activity includes any illegal criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force against the person or property of another.

Evidence of criminal activity is based upon the PHA's assessment of the preponderance of evidence obtained from law enforcement agencies regardless of whether the family member has been arrested or convicted.

The PHA will not be obligated to ferret out information concerning a family's criminal activities as part of the processing of an application for assistance. Initial screening will be limited to routine inquiries of the family and any other information provided to the PHA regarding this matter. The inquiries will be standardized and directed to all applicants by the inclusion of the inquiry on the application form.

Families who have been evicted from Public Housing or by Section 8 owners for engaging in these activities will be denied admission.

E. SUITABILITY OF TENANT

The PHA does not screen for factors such as credit rating or landlord references which relate to the suitability of the applicant family as tenants. Screening the family is the sole responsibility of the landlord. However, the PHA may deny admission to a family on the basis of criminal activity, illegal drug use or drug trafficking.

- **CHANGES WHICH OCCUR BETWEEN FINAL ELIGIBILITY DETERMINATION AND EFFECTIVE LEASE DATE**

Changes which occur during this period will not affect eligibility to lease the unit. For example, if a single person is pregnant and aborts during this period, if the family goes over the income limits, or if a single person loses his/her disability status which was necessary to establish eligibility, s/he will continue to be eligible for the program and may continue with lease-up.

IV. APPLYING FOR ADMISSION

A. HOW TO APPLY

The PHA elects to maintain a separate waiting list for the Section 8 Program applicants will be wait listed and may be offered a Section 8 Certificate, Housing Voucher or Moderate Rehabilitation unit depending upon the type of Section 8 assistance available.

Families wishing to apply for any of the PHA's programs must complete an application when application-taking is open.

If the waiting list is closed and the PHA decides to open the waiting list, the PHA will publish the application date(s), in local general circulation newspapers. The PHA's advertisement will state criteria to define and limit what families may apply for assistance during this period of application taking. The publication will also specify the location where applications are taken.

Applications are taken to compile a waiting list. Due to the demand for housing in the PHA's jurisdiction, the PHA does not generally take applications on an "open enrollment" basis but may elect to do so.

The application process will be undertaken in two phases: 1) a preliminary application will be taken first and eligibility will be determined. 2) When the family comes to the top of the waiting list and the PHA will be ready to issue a Certificate or Voucher within 60 days, the PHA will take a full application and verify the information provided by the family.

Acceptance of Applications:

When application taking is open, applications are dated when they are received by the PHA.

Preliminary applications do not require an interview, but full applications do.

Any family requesting a preliminary application for Section 8 rental assistance will be given the opportunity to apply as long as the waiting list is open and the PHA is accepting applications.

B. OPENING/CLOSING OF APPLICATION TAKING

B. OPENING/CLOSING OF APPLICATION TAKING

Applications will be accepted only during the advertised periods of enrollment. These enrollment periods are determined based upon the need of the PHA to augment its waiting list and to comply with local admission preferences.

The PHA may suspend the taking of applications during the enrollment period by public notice if the waiting list is such that additional applicants would not be able to receive a Certificate of Family Participation or Voucher within 12 months.

Reopening of the Wait List:

The following procedures will apply to all public notices concerning periods of enrollment:

- publishing the notice in the local newspaper;
- posting the notice in the Applications Office;
- publishing the notice in local minority media publications.

Wait-Listing of Applicants:

The PHA elects to maintain and process applications from a separate wait list for Section 8 applications. In the event the family wishes to make an application to live in a Public Housing community, the family will be advised to complete a separate Public Housing application.

C. PRELIMINARY APPLICATION PROCEDURES

The PHA will utilize a basic preliminary application form. The information is to be filled out by the client whenever possible.

The purpose of the preliminary application is to assess family eligibility for placement on the waiting list.

The preliminary application requests the following information and must be completed in its entirety:

- names and ages of all household members;
- gender and relationship of members;

- address and telephone number;
- amount and source of all income and assets;
- information to confirm any disabilities of family members;
- information related to selection preferences.

The preliminary application for the Section 8 Certificate Program is also utilized for the Voucher Program.

When the application is completed, the PHA staff will assess the applicant's eligibility as a Section 8 participant. If eligible the applicant will be placed on the appropriate waiting list(s) in accordance with the PHA's preference policies.

If the applicant is ineligible, the PHA will provide written notification.

While on the wait list, applicants are responsible for reporting to the PHA changes in family circumstances (including income, address, and family composition changes) in writing and are responsible for responding to requests from the PHA to update preliminary applications. Refusal or failure to provide information may result in the applicant being removed from the waiting list.

D. NOTIFICATION OF FAMILY STATUS ON THE WAITING LIST

After being placed on the waiting list, the applicant will be informed by mail of the probable date their name will be reached to receive a Certificate or Voucher. The PHA communication will in no way lead applicants to believe that the estimated date of Certificate or Voucher issuance is exact, but will stress that the estimated date of Certificate or Voucher issuance is subject to several factors that are beyond the PHA's control (i.e. preference determination, turnover, funding, etc.)

E. COMPLETION OF THE FULL APPLICATION PROCESS

Applicants on the waiting list will be requested to complete the full application process when the PHA estimates that a Certificate or Voucher can be issued within 60 days. The full application process consists of an interview and the applicant completing the PHA's Personal Declaration Form.

The family will complete the full application process on their own by using the Personal Declaration Form as the basis for the full application.

Families will be scheduled for an interview as part of the PHA's procedures for processing a full application.

1. Requirement to Attend Scheduled Meeting.

It is the applicant's responsibility to reschedule the interview prior to the scheduled interview date if they cannot attend the appointment. The applicant must contact the PHA to reschedule the appointment by no later than 4:30 p.m. on the day of the appointment. The PHA will allow only one rescheduling of the application appointment. If the applicant does not reschedule and misses the scheduled meeting, the PHA has the right to reject the application. Applicants will be notified in writing if the application is rejected for this reason.

Rejection of the application means that the household will be removed from the waiting list and must reapply when applications are being taken.

The household head or spouse is required to attend the interview and sign the housing application. All adult members must sign the application and sign the required forms.

2. Verification of Full Application Information.

Information provided by the applicant will be verified including information on family composition, income, assets, allowances and deductions, preference status, full time student status, and other factors relating to eligibility determination before the applicant is issued a Certificate or Voucher.

Third party verifications in writing (sent by mail) are preferred. Oral third party verifications are acceptable if documented.

If third party written verification is impossible or the third party does not respond within a four-week period, the PHA will use documents provided by applicants. Documents will be photocopied when not prohibited by law. When documents cannot be photocopied, staff certification forms will be used to record the source of information and will be signed and dated by the staff person who viewed the document.

If the PHA determines at the interview that more information or verification is needed, the applicant will be given or sent a need-more letter, requesting the applicant to provide the information within 10 days from the date of the letter. If there is no response after 10 days, a second need-more letter will be sent with an additional 10 day response period.

If there is no response to the second need-more letter, within 10 days, an ineligibility letter will be sent to the applicant.

Acceptable verification of preferences is listed under the preference section of this Plan. Preferences will be verified prior to completing the full application process, and may be done prior to calling the applicant in for an interview. If preference status has changed the applicant will be notified of their new status on the wait list(s).

F. FINAL DETERMINATION AND NOTIFICATION OF ELIGIBILITY

Because HUD can make changes in rules and regulations, it is necessary to make a final eligibility determination. Also, family circumstances may have changed between preliminary application and final eligibility determination.

After the verification process is completed, the PHA makes its final determination of eligibility, based on the same factors as preliminary eligibility, but using verified data.

The household is not eligible for Certificate or Voucher issuance until this final determination has been made, even though their application has been preliminarily determined eligible and placed on the wait list(s).

G. GROUNDS FOR DENIAL OF ADMISSION

In accordance with the regulations, the PHA is not required to assist families for any of the following grounds:

1. If the family violates any tenant obligations under the Program;
2. If any member of the family has ever been evicted from public housing;
3. If a PHA has ever terminated assistance under the certificate or voucher program for any member of the family;
4. If any member of the family commits drug-related criminal activity or violent criminal activity;
5. If any member of the family commits fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program;
6. If the family owes rent or other amounts to the PHA or to another housing authority in connection with Section 8 or public housing assistance under the 1937 act;
7. If the family has not reimbursed any housing authority for amounts paid to an owner under a HAP contract for rent damages to the unit, or other amounts owed by the family under the lease;
8. If the family breaches an agreement with a housing authority to pay amounts owed to a housing authority;
9. If a family participating in the Family Self Sufficiency Program fails to comply, without good cause, with the family's FSS contract of participation;
10. If the family has engaged in or threatened abusive or violent behavior toward a

housing authority's personnel.

Former Section 8 participants or Public Housing residents are eligible to reapply for the Section 8 program under the following conditions:

- Previous Section 8 participants who have been terminated may reapply if they have not been terminated for fraud or for any other corrupt act in connection with any federal housing assistance program. A three-year period of ineligibility must be completed before the family is permitted to reapply. The ineligibility period starts at the termination date of the previous housing assistance;
- All amounts owed the PHA must have been paid in full;
- All former adult residents evicted from the PHA's public housing program must also complete a three-year period of ineligibility. The ineligibility period starts at the court approved eviction date. However, if the reason for eviction was tenant fraud, the family is permanently barred from participating in the Section 8 Program.

H. RIGHT TO INFORMAL REVIEW

Applicants who are denied Section 8 assistance are entitled to an informal review of their application. People are considered "applicants" until there is an effective lease and subsidy contract, at which time they become "participants."

Ineligible applicants will be promptly provided with a letter detailing their individual status, stating the reason for their ineligibility, and offering them an opportunity for an informal review.

An informal review may be requested for the following decisions denying:

- listing on the PHA's wait list;
- issuance of a certificate or voucher;
- participation in the program.

Applicants must submit their request in writing to the PHA within 10 days from the date of the notification.

Informal reviews shall be conducted in accordance with the PHA's Manual of Policies and Procedures Governing Tenant Grievances.

I. FULL APPLICATION (INITIAL)

The PHA will send written notice to the applicant that an appointment has been scheduled to begin the full application process. If the applicant does not show for this appointment, a second appointment will be scheduled within 10 to 14 days. The PHA will send written notice to the applicant of the second appointment. If the applicant fails to show for the second appointment, the PHA will initiate procedures to remove the applicant from the wait list.

If the applicant notifies the PHA that they are unable to keep either the first or second appointment, a third appointment may be scheduled at the discretion of the Application Supervisor, if s/he determines that the applicant had a valid excuse(s) for missing the appointments.

No more than three appointments may be scheduled for the purpose of starting the full application process.

J. NEED-MORE APPOINTMENT AND/OR DOCUMENTS

At the applicant's initial appointment, the PHA may require the applicant to provide additional documents or certifications in order to complete the full application process. The PHA will schedule a "need-more" appointment with the applicant to enable the applicant to give the requested items directly to the application caseworker. This procedure enables the caseworker to complete the application interview and certification process. The caseworker may also request that the applicant return or mail the additional needed items to the PHA's offices in order to conclude the full application process. A deadline for receiving required documents will be given to the applicant in writing and noted in the applicant's file.

The PHA will give an applicant no more than two opportunities to provide the required additional information in order to complete the full application process. The applicant's refusal or inability to provide the requested information shall be grounds for the removal from the wait list.

V. ESTABLISHING PREFERENCES AND MAINTAINING THE WAITING LIST

A. PRELIMINARY APPLICATION POOL

An application pool will be maintained in accordance with the following factors:

1. The preliminary application will be a permanent file filed numerically by client number.
2. The pool will be maintained on the computer in order of preference. Applications equal in preference will be maintained by date and time of their preliminary application date. All applications will be grouped by the number and type of local preferences claimed and be ranked by group and position within each group.
3. All applications must meet income eligibility requirements as established by HUD or by the PHA in conformance with HUD regulations.

The waiting list will be continuously updated.

The following types of families will not be considered part of the waiting list:

- a. Portability families from another jurisdiction who are considered eligible under the Certificate or Voucher portability provisions;
- b. Families “targeted” by HUD or the PHA to receive a special type of Certificate or Voucher:
 - a. families displaced because of demolition or disposition of a public housing project;
 - b. families residing in a multi-family rental housing project when HUD sells, forecloses, or demolishes the project;
 - c. for families covered by the Low Income Housing Preservation and Resident Homeowner Act of 1990;
 - d. a non-purchasing family residing in a project subject to a home ownership program under 24 CFR 248.173;
 - e. a family displaced because of mortgage prepayment or voluntary termination of mortgage insurance contract (24 CFR 248.165);
 - f. a family residing in a project covered by a project-based Section 8 HAP contract at or near the end of the HAP contract term;
 - g. a non-purchasing family residing in a HOPE I or HOPE 2 project;
 - h. families participating the Family Unification Program;
 - i. families participating in the Mainstream for Persons with Disabilities Program;

- j. Shelter Plus Care participants or other similar supportive housing programs for disabled or homeless families.

The PHA will retain a hard copy of records of the Section 8 wait lists for one fiscal year (January 1 to December 31) in order to provide an audit trail for inspection by Independent Public Audit (IPA) and HUD. When HUD approves the IPA audits, the PHA will release the wait lists for destruction.

B. WAIT LIST PREFERENCES

The PHA chooses to target all its Section 8 Certificates and Housing Vouchers (except for special set asides, e.g., Shelter Plus Care) to applicants earning 30 percent or less of the Franklin County median income, adjusted for family size, as the primary way of meeting its obligation to serve the community's "poorest of the poor." Higher income groups would not be served unless all applicants with the lower income preference have been assisted.

In the event that future HUD regulations permit, the PHA may enter into separate agreements with community service providers or other appropriate agencies to provide housing assistance to severely disadvantaged client populations which may be homeless, disabled, victims of domestic violence, or other disadvantaged populations. Such agreements may not exceed 20 percent of the available Certificates or Housing Vouchers at any time.

C. ORDER OF SELECTION

Applications will be ranked in the following order:

- b. Applicants earning 30 percent or less of the median income as adjusted for family size, not currently receiving subsidized housing assistance, and **with** a veteran's preference;
- c. Applicants earning 30 percent or less of the median income as adjusted for family size, not currently receiving subsidized housing assistance, and **without** a veteran's preference;
- d. Applicants earning 31 percent or more of the median income as adjusted for family size, not currently receiving subsidized housing assistance, and **with** a veteran's preference;
- e. Applicants earning 31 percent or more of the median income as adjusted for family size, not currently receiving subsidized housing assistance, and **without** a veteran's preference;
- f. Applicants earning 30 percent or less of the median income as adjusted for

- family size, currently receiving subsidized housing assistance, and **with** a veteran's preference;
- g. Applicants earning 30 percent or less of the median income as adjusted for family size, currently receiving subsidized housing assistance, and **without** a veteran's preference;
 - h. Applicants earning 31 percent or more of the median income as adjusted for family size, currently receiving subsidized housing assistance, and **with** a veteran's preference;
 - i. Applicants earning 31 percent or more of the median income as adjusted for family size, currently receiving subsidized housing assistance, and **without** a veteran's preference;
 - j. Applicants who are single and not disabled, displaced, or elderly earning 30 percent or less of median income as adjusted for family size, not currently receiving subsidized housing assistance, and **with** a veteran's preference;
 - k. Applicants who are single and not disabled, displaced, or elderly earning 30 percent or less of median income as adjusted for family size, not currently receiving subsidized housing assistance, and **without** a veteran's preference;
 - l. Applicants who are single and not disabled, displaced, or elderly earning 31 percent or more of median income as adjusted for family size, currently receiving subsidized housing assistance, and **with** a veteran's preference;
 - m. Applicants who are single and not disabled, displaced, or elderly earning 31 percent or more of median income as adjusted for family size, currently receiving subsidized housing assistance, and **without** a veteran's preference.

The PHA will rank each of the above groups by the date and time of the application. The PHA does not elect to give a higher ranking to or aggregate any of the above preferences. Interviews for completion of a full application are scheduled on this preference system.

1. Local Preference.

The PHA has adopted a veteran's preference pursuant to Ohio Revised Code.

2. Initial Determination.

If the preference verification indicates that the applicant is not entitled to the preference, the applicant will be replaced in order on the waiting list without the preference or denied a place on the waiting list. The decision to deny the applicant a place on the waiting list will be dependent upon the criteria for accepting eligible applications.

D. MAINTAINING THE WAITING LIST

After the preliminary eligibility determination has been made, applicants are placed on the waiting list in order of application date and preference. The PHA will maintain an accurate waiting list which conforms to HUD requirements.

The waiting list will provide the following information on apparently eligible households who have an active pre-application:

- n. Name of head of household;
- o. Date and time the pre-application was received;
- p. Unit size required;
- q. Preference status codes;
- r. Minority status (when required by the Field Office);
- s. Eligibility date;
- t. Client number;
- u. Location Code

E. UPDATING THE WAITING LIST

The PHA will periodically update the waiting list to ensure that it is current and accurate. In order to update the waiting list, the PHA will mail an "Are You Still Interested" Letter to the applicant's last known address, requesting information regarding their continued interest in maintaining a place on the waiting list.

Any mailings to the applicant which require a response will give a reasonable deadline for the applicant's written response. If the applicant does not respond by the deadline, the applicant will be removed from the waiting list.

If the applicant did not notify the PHA of a move as required, the PHA will not be responsible for the applicant's failure to receive the update request. Letters returned by the Post Office will result in the applicant being removed from the wait list.

If an applicant is removed from the waiting list for failure to respond, they will not be entitled to a reinstatement unless the Section 8 Programs Director determines there were circumstances beyond the applicant's control.

F. FINALIZING THE DETERMINATION

All completed and verified full applications are added to an "eligible to be notified" list and families are called in for briefing and issuance of certificates in accordance with this Administrative Plan.

G. OFFERS OF A CERTIFICATE OR VOUCHER

The PHA will send a letter to the applicant confirming the applicant's eligibility and inform the applicant that a briefing class will be scheduled for them to receive either form of assistance depending upon what type of assistance is available. When the applicant receives the PHA's notice to attend the briefing class, the applicant may request the alternate form of assistance.

The applicant must make a written request for the alternate form of assistance. The PHA will advise the applicant of the possibility of receiving the other type of assistance and if the other form becomes available, the applicant will be invited to attend the briefing class. If the applicant refuses both types of assistance, they will be declared ineligible and will be removed from the waiting list.

VI. SUBSIDY STANDARDS

A. CERTIFICATE/VOUCHER SIZE ISSUED

HUD regulations require that the PHA establish subsidy standards for the determination of bedroom sizes for the Certificate, Voucher, and Over Fair Market Rent Tenancies. These standards provide for a minimum commitment of subsidy while avoiding overcrowding. They also must meet the minimum requirements of the Housing Quality Standards.

The unit size assigned to a participant in the Section 8 Program serves as the basis for determining maximum rent that can be paid to an owner for the unit selected by the family.

The unit size on the Certificate, Voucher, or Over Fair Market Rent Tenancy remains the same as long as the family composition remains the same, regardless of the actual unit size selected.

The subsidy standards are based on the following criteria:

Bedroom Size	Minimum No. of Persons in Household
0-BR	1
1-BR	1
2-BR	2
3-BR	3
4-BR	4
5-BR	5
6-BR	6

Certificate, Voucher, and Over FMR Certificate subsidies are also subject to the following guidelines:

1. It will not be necessary for persons of different generations or opposite sex, except for spouses (or those living as spouses) to occupy the same bedroom.
2. Two children of the same sex may share a bedroom. The PHA may grant a larger bedroom size to accommodate different generations (ten years or greater).
3. A single head of household shall not be required to share a bedroom with his/her children.

4. A single individual with no other children who informs the PHA that she is pregnant at the time of her certificate/voucher issuance may be assigned a 2 bedroom certificate or housing voucher if either type of housing assistance is available at the time of initial issuance.

The family may request a larger bedroom size Certificate or Voucher by providing a written justification to the PHA. The family's request must be made within 10 days of the PHA's designation of the bedroom size on the family's certificate or voucher.

The PHA will consider the request according to the conditions outlined in this Plan and determine whether or not the request will be granted. The necessity for an exception to unit size standards must be verified and documented. The granting of the exception shall be at the sole discretion of the PHA.

Special circumstances may dictate a larger size than the Subsidy Standards permit:

Spouses who, because of verified medical reason, cannot share a bedroom and cannot locate a dwelling unit that has another room that can qualify as a sleeping area;

An elderly person or person with a disability who requires a live-in attendant.

The PHA will review the request and give the larger size if the PHA determines the request is reasonable.

B. UNIT SIZE SELECTED

The family may select a smaller or larger dwelling unit size than the bedroom size that is listed on the Certificate.

There are three criteria to consider for the Certificate Program:

1. **Fair Market Rent Limitation.** The PHA must always apply the Fair Market Rent for the Certificate size approved for the family or the unit size actually selected by the family, whichever is less.
2. **Utility Allowance.** The utility allowance used to calculate the gross rent is based on the actual size of the unit the family selects regardless of the size authorized on the family's Certificate.
3. **Housing Quality Standards.** HQS Standards allow 2 persons per living/sleeping room and would permit the following occupancy conditions, assuming that a living room qualifies as a living/sleeping area:

Bedroom Size	Maximum No. of Persons in Household
0-BR	1
1-BR	4
2-BR	6
3-BR	8
4-BR	10
5-BR	12
6-BR	14

For the Voucher Program or the Over Fair Market Rent Tenancy, a family is not restricted by the bedroom size of the unit they select for housing other than the unit meeting minimum Housing Quality Standards for space. However, if a Voucher or Over Fair Market Rent Tenancy family selects a unit smaller than their subsidy standard size, the PHA's Payment Standard or Fair Market Rent will be adjusted to the same bedroom size as the unit.

The utility allowance used for Voucher and Over FMR tenancies is the actual bedroom size and type of the unit selected, regardless of the subsidy size.

C. DOCUMENTATION

Any reason for the deviation from the above policies will be recorded in the tenant file.

VII. FAMILY INCOME AND DETERMINATION OF TOTAL TENANT PAYMENT

A. DEFINITION OF TEMPORARILY ABSENT

Families must notify the PHA in writing of any absence of any household member from the unit of more than 30 consecutive days. The family must supply any PHA requested information or certification on the purpose of family absences. The family's failure or refusal to cooperate shall be grounds for termination.

If the family leaves the unit for more than 3 consecutive months, or for more than 90 days in a calendar year, except for medical circumstances described in VII (A(4)), the unit will not be considered to be their only place of residence and they will be terminated from the program.

Common family situations require the PHA to provide the following policies:

1. If there is a one parent home and the children are removed from the parent, but after counseling the children will be returned, the PHA will contact Social Services to determine how long it will be before the children will be returned. The situation will be reevaluated after 90 days;
2. The parent will retain his/her eligibility as a remaining member of the tenant family. S/he must be issued a reduced size Certificate or Voucher, if the children are projected to be out of the home for more than six months from the initial removal date;
3. To determine whether and when the bedroom size should be changed, the PHA will use an approximate time of three months as a guide, depending on the individual circumstances and verification provided;
4. If the single parent temporarily leaves the household and if another adult is awarded temporary custody of the children while the parent is away, as long as the family continues to meet the definition of family, the family is not terminated. The single parent must not be absent from the unit for more than three (3) consecutive months or not more than 90 days in a calendar year.

1. Spouse.

If the spouse leaves the household and will be gone for 3 months or more in the recertification period and the family declares them permanently absent, they will be determined permanently absent and removed from the lease.

If the husband or wife leaves the household and the period of time is estimated to be less

than 3 months, the family member may be determined to be temporarily absent unless the husband or wife institutes and/or obtains a divorce or legal separation. In that case the person who leaves the household will be considered permanently absent. Proof of instituting or obtaining a divorce or legal separation will be required when claimed by the family.

If the family member with children gives notice to the PHA before vacating the unit, the PHA will make a determination as to who will retain the Certificate or Voucher.

2. Adult Child.

If an adult child enters the military service and leaves the household, they will be determined permanently absent.

A student (other than husband or wife) who attends school away from home but lives with the family during school recesses may be considered permanently absent (income not counted, not on lease, not counted for Certificate/Voucher size) or temporarily absent (income counted, on lease, counted for Certificate/Voucher size) at the family's option.

3. Joint Custody of Children.

Children who are subject to a joint custody agreement but live in the unit at least 50% of the time will be considered members of the household. "50% of the time" is defined as 183 days of the year, which do not have to run consecutively.

4. Sole Member of Household.

General Leaves of Absence:

If the sole member of the household must leave the household for more than 3 consecutive months, or for more than 90 days in a calendar year, the unit will not be considered to be their only place of residence and they will be terminated from the program unless the family requests an extension by submitting documentation from a reliable medical source that s/he will return within a total of 6 months (an additional 3 months.) See definition of temporarily absent in this section for further family requirements.

Medical Leave of Absence:

If the sole member of the household must leave the household to go to the hospital or nursing home, advice from a reliable medical source must be obtained as to the likelihood

and timing of their return.

If the medical source informs the PHA that they will be permanently confined to a nursing home, they will be considered permanently absent. If they are temporarily confined, they will not be considered permanently absent. In no event, however, will the unit be considered their only place of residence when they are out of the household for more than 6 months or 180 days in a calendar year.

5. Visitors.

Visitors are allowed to stay for up to 30 days in the typical lease. If the person is a visitor and does not intend to become a "permanent" member of the family, the PHA does not have to consider this a change in family composition.

If an adult visitor stays in the unit for more than 30 days per year, they will be considered a member of the household, unless the PHA and the owner have approved an extension in writing for special circumstances.

Minors and college students who were part of the family but who now live away from home during the school year and are not considered members of the household may visit for up to 150 days per year without being considered a member of the household as long as they have written permission of the owner/manager to stay longer than 30 days.

In addition, in a joint custody arrangement, if the minor is in the household less than 183 days per year, the minor will be considered to be an eligible visitor and not a family member.

6. Adult Family Members Other than Spouse.

If other persons who were previously declared to be members of the family, such as members living in a spousal relationship, the family may declare in writing and provide proof that they will be absent from the unit for at least three months or more. If the PHA is satisfied with the family's explanation and documentation of the absence, the family member will be determined to be permanently absent from the unit. The family must cooperate and furnish information concerning the absence of a family member. Failure to cooperate and/or to furnish the requested information shall be grounds for termination from the Program.

Acceptable proofs of absence include utility bills, canceled checks for rent, telephone bills, or other documents that prove residency at another location.

7. Reporting to Owner.

The additional person, whether a family member or a visitor, must report to the owner/manager. The PHA will not process a new HAP Contract and Lease Amendment for the family until the family documents that they have the owner's approval. In the case of the minor or college student staying longer than 30 days, as described above, written permission must be obtained from the owner, allowing them to continue in residence as a visitor.

8. Reporting to the PHA.

The family must declare a member as permanently or temporarily absent in writing to the Housing Authority. The PHA will advise the family at that time, or at reexamination, what the options are and how it might affect the Total Tenant Payment or the Certificate or Voucher size.

B. AVERAGING INCOME

There are two methods to calculate income when the income is not received for a full year:

1. Annualizing current income (and subsequently conducting an interim reexamination if income changes); or
2. Averaging known sources of income that vary to compute an annual income (no interim adjustment if income remains what was calculated).

The PHA will use the annualizing current income method for all families unless the income cannot reasonably be annualized due to its uncertainty. In that case, the following considerations should be used as a guide. These considerations will be used unless a Supervisor approves a deviation.

Last year's income should be analyzed to determine the amount of income to be anticipated when it cannot be clearly verified.

If the last three months' income are representative of the income anticipated for the next year the last three months may be used to anticipate the income.

If the income verification anticipates an increase which can be verified, it should be calculated. For example, if the anticipated income from the employer shows a raise in pay which is to occur 4 months from the effective date of the recertification, income is to be

calculated at the old rate for 4 months and at the new rate for 8 months.

If there are bonuses anticipated, but the employer does not know how much the bonus will be, the bonus from last year, if any, will be used for calculation purposes.

C. MINIMUM INCOME

HUD regulations and the PHA policy require a \$50 minimum total tenant payment toward rent and utilities.

Families who report zero income may be required to fill out the Personal Declaration statement/certification every 90 days.

D. TEMPORARILY ABSENT FAMILY MEMBERS' INCOME

The income of temporarily absent family members will be counted. If the spouse or the head of household is temporarily absent, his/her entire income is counted.

E. INCOME OF PERSON PERMANENTLY CONFINED TO NURSING HOME:

If a family member is permanently confined to the hospital or nursing home, and there is a family member left in the household, the PHA will calculate the total tenant payment by excluding the income of the person permanently confined to the nursing home and giving the tenant no medical deductions paid on behalf of the confined family member.

(For determination as to whether the person is confined to a nursing home on a temporary or permanent basis, see the definition of temporarily/permanently absent in this Plan.)

F. REGULAR CONTRIBUTIONS AND GIFTS

Regular contributions and gifts received from persons outside the household are counted as income.

This includes any regular payments on bills or other services, including rent and utility payments paid on behalf of the family, and other similar cash or non_cash contributions provided on a regular basis.

Casual contributions or sporadic gifts are excluded as income. Cash contributions for groceries or other food items may also be excluded as income.

G. ALIMONY AND CHILD SUPPORT

Regular alimony and child support payments are counted as income. If the child support is not received on a regular basis, the PHA must count the amount of child support in the divorce decree or separation agreement unless the PHA verifies that the income is not provided.

In order to calculate with any other amount than the amount in the award, the PHA must obtain a certification from the tenant as to how much is being received on an annual basis and they must have documentation in the file that the family has filed with the agency responsible for enforcing the payments.

When payment history is received from the child support agency for the prior 12 months, the PHA will use the amount received over the last 12 months if no projection of anticipated income can be made.

H. LUMP SUM RECEIPTS:

Lump_sum additions to Family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses are **not** included in income.

Lump sum payments caused by delays in processing periodic payments for Social Security or SSI is **not** counted as income.

Lump sum payments caused by delays in processing periodic payments such as unemployment or welfare assistance **is** counted as income.

Treatment of accumulated periodic payments because the income was deferred due to a dispute is handled no differently than periodic payments which are deferred because of processing problems. PHAs may develop a calculation which calculates retroactively or prospectively.

The calculation will be done prospectively for families who report the lump sum amount on a timely basis.

If the lump sum amount is received and reported so that it results in an interim adjustment,

it will be calculated as follows:

1. The entire lump sum payment will be added to the rest of the annual income at the interim;
2. The PHA will determine the percent of the year the interim represented (3 months would be 25% of the year, leaving a 75% balance);
3. At the next annual re-certification, the PHA will take 75% of lump sum and add to the rest of the annual income;
4. The lump sum will be used in the same method for any interim re-certification which occur prior to the next annual re-certification.

If the family does not report the lump-sum payment in a timely manner, the lump sum amount will be calculated retroactively by calculating the lump-sum retroactively, going back to the date the lump-sum payment was to be considered. If the lump-sum payment period started 5 months ago, for example, the entire lump-sum amount is added to the Annual Income in effect 5 months ago and the Total Tenant Payment and Tenant Rent is recalculated. The new Tenant Rent is taken times the number of months that had elapsed until the current calculation and the difference between what was paid and what should have been paid is determined.

At the PHA's option, the tenant will enter into a Repayment Agreement or be required to pay the entire amount.

Attorney Fees:

Attorney fees may be deducted from lump sum payments when computing annual income when:

1. The attorney's efforts have recovered a lump-sum compensation for the wrongful reduction or denial of a periodic payment, and;
2. The recovery does not include an additional amount in full satisfaction of the attorney fees.

In these situations, the tenant does not actually recover the entire amount of the past due periodic payment because s/he must pay the attorney fees.

This situation does not include those in which an amount is withheld from funds otherwise due the tenant to satisfy legitimate financial obligations unrelated to obtaining the income such as:

1. Withholding from wages to pay child support, alimony or judgement creditor;

2. Garnishment for failure to pay child support, alimony, or judgement creditor.

The above-mentioned situation does not include those where a tenant incurs attorney fees unrelated to asserting a right to a source of income or where no income results from the attorney's actions. These are the financial responsibility of the tenant and are not deducted in determining annual income.

I. CONTRIBUTIONS TO RETIREMENT FUNDS

Contributions to company retirement/pension funds are handled in this manner:

1. While an individual is employed, count only amounts the family can withdraw without retiring or terminating employment.
2. After retirement or termination of employment, count any amount the employee elects to receive as a lump sum.

J. ASSETS DISPOSED OF FOR LESS THAN FAIR VALUE

The PHA must count assets disposed of for less than fair market value during the two years preceding examination or reexamination of the family's income. The PHA will count the difference between the market value and the actual payment received.

Assets disposed of as a result of foreclosure or bankruptcy are not considered to be assets disposed of for less than fair market value. Generally, assets disposed of as a result of a divorce or separation are not considered to be assets disposed of for less than fair market value.

HUD does not specify a minimum threshold for counting assets disposed of for less than Fair Market value, but allows PHAs to establish a threshold in the Administrative Plan that will enable them to ignore small amounts such as charitable contributions.

The PHA's minimum threshold for counting assets disposed of for less than Fair Market value is \$5,000. If the total amount of assets disposed of within a one year period is less than \$5,000, they will not be considered an asset for the two-year period.

If the asset disposed of within a one year period is more than \$5,000, the assets disposed of for less than Fair Market value will be counted as an asset for two years from the date the asset was disposed of.

K. CHILD CARE

Child care cannot be given if there is a non-employed adult household member capable of caring for the child who can provide the child care. Examples of those adult members who would be considered unable to care for the child may include:

1. The adult member in a documented child abuse situation;
2. A documented medical condition that renders the person unable to provide care to a small child.

The reasonableness standard for child care is as follows:

Child care to work: The maximum child care allowed will be based on the amount earned of the person enabled to work. The "person enabled to work" will be the adult member of the household who earns the least amount of income from working.

Child care for school: The PHA will compare the number of hours the family member is attending school and base the reasonableness standard on the number of hours attending school (with the addition of 1 hour travel time each way to and from school) versus the number of hours claimed for child care.

Rate of Expense: The PHA will survey the local day care providers in the area/community to determine a reasonableness standard. The determination will be made only on a reasonable hourly rate.

If the child care provider is an individual, the individual must provide a notarized statement of the amount that is being charged.

L. MEDICAL EXPENSES

When it is unclear in the HUD rules as to whether or not to allow an item as a medical expense, IRS Publication 502 will be used as a guide.

Nonprescription medicines must be doctor recommended with a specific dosage in order to be considered as a medical expense.

M. OTHER EXCLUDED SOURCES OF ANNUAL INCOME

Annual income does not include the following:

1. Income from the employment of children (including foster children) under the

- age of 18 years old.
2. Payments received for the care of foster children or adults.
 3. Amounts that are specifically for, or in reimbursement of medical expenses for any family member.
 4. Income of a live-in Aide, as defined by HUD regulations.
 5. Any form of student financial assistance.
 6. Armed services hostile duty pay.
 7. Any type of HUD training assistance payments.
 8. Any disregarded amounts of SSI income under the Plan to Attain Self-Sufficiency (PASS) Program.
 9. Any amounts received for reimbursement of out-of-pocket expenses for participation in a federal assisted self- sufficiency program.
 10. A resident service stipend less than \$200 per month.
 11. Compensation from State or local employment training programs with clearly defined objectives and with limited time income exclusions.
 12. Temporary, nonrecurring or sporadic income(including gifts).World War II reparation payments paid by foreign governments.
 13. Earnings in excess of \$480 for each full time student 18 years of age or older (excludes household head and spouse).
 14. Adoption assistance payments in excess of \$480 per adopted.
 15. Deferred periodic payments of supplemental security income and social security benefits received in a lump sum.
 16. Refunds or rebates of state or local property taxes.
 17. State payments for a developmentally disabled family member.
 18. Any other amounts excluded by federal statute.

N. EXCEPTIONS TO MINIMUM RENT

Families who are subject to the PHA's \$50 minimum rent requirement may request an exception to the minimum rent requirement by making a written request for an exemption. A family may request an exception due to financial hardship which may include the following situations:

- the family has lost eligibility or is waiting for an eligibility determination for a federal, state, or local assistance program;
- the family would be evicted as a result of the imposition of the minimum rent requirement;
- the income of the family has decreased because of changed circumstance;
- a death in the family has occurred; or
- other circumstances determined by the PHA or HUD.

For definition purposes, family means the persons who have been declared by the family on the most recent Personal Declaration form and have been approved by the PHA to reside in the unit.

O. RETROACTIVITY OF HARDSHIP REQUESTS

If the family does not file a written request for an exemption within 30 days of receiving the PHA's initial notification of exemption of minimum rent policies, the exemption request will not be applied retroactively.

P. VERIFICATION OF A FINANCIAL HARDSHIP

See Section VIII of this Administrative Plan.

Q. PROCEDURES FOR APPROVING MINIMUM RENT EXCEPTIONS

The PHA will promptly respond to a family's written request for a minimum rent exception. If the family is determined to be a minimum rent family, the family's total tenant payment will be adjusted for the following month unless the request for the exemption is made pursuant to subsection O above.

The PHA will make a determination based on the evidence and circumstances of the hardship request and promptly send written notice to the family either approving or denying the family's request. If the PHA disapproves the family's hardship request, the family may request an informal hearing. The request for a formal hearing must be made in writing and received by the PHA within 10 days after the denial notice to the family.

If the family is granted a hardship that meets the requirements of the subsection N above and is determined to be long-term, the family total tenant payment will be adjusted.

In the event the hardship request is not approved and the family owes a balance, the family will be required to enter into a repayment agreement pursuant to Section XXII of this Plan.

R. INCOME CHANGES DUE TO WELFARE PROGRAM REQUIREMENTS

The PHA will not reduce the family's share of rent for families whose welfare assistance is reduced specifically reduced due to fraud, failure to participate in an economic self-sufficiency program, or non-compliance with a work activities requirement.

However, the PHA will reduce the family's rent if the welfare reduction is a result of the expiration or a lifetime time limit on receiving benefits or where the family has complied with welfare program requirements but cannot or has not obtained employment.

All total tenant payment determinations are subject to informal reviews.

VIII. VERIFICATION PROCEDURES

A. GENERAL POLICY

The PHA verifies income, family composition, status of full time students, value of assets, factors allowing a preference, and other factors before issuing certificates or vouchers to applicants.

B. METHODS OF VERIFICATION

In the order presented, the PHA will attempt to achieve verification:

1. Third Party Verification.

Third party verification is considered to be the most reliable means of verifying information provided by the family. Verification forms will be sent by mail to the appropriate third party with a request that the form be returned via mail. It is the intent of the Authority that the form shall never pass through the hands of the applicant/participant. The PHA will not allow tenants to "hand carry" or bring back verifications from the sources except as listed below.

In the event that third party written verification is not possible due to an unwillingness by the source to respond to the PHA's request or in the event that the information is not returned within a four week period, staff will be advised to note the file accordingly and then to proceed with the third party oral verification.

Oral verification will be achieved through interviewing the source. When third party oral verification is used, staff will be required to document who they spoke with, the date of the conversation, and the nature (facts provided) of the conversation.

Use of Computer Print-Outs:

Because many public agencies have converted to the use computer-generated forms, the PHA will accept all such computer forms from the family as documentation of third party written verification. Such sources and forms may include but are not limited to:

- social security benefits;
- Veteran's Administration benefits;
- Public Assistance and/or Aid to Dependent Children Benefits;
- unemployment benefits;
- child support payments through agency enforcement.

2. Review of Documents.

For payments made to families from public agencies as noted above, the PHA will review the family supplied document and compare the furnished income information with the family's completed Personal Declaration Form. If there are any discrepancies, the PHA will obtain a third-party verification from the public agency.

In the event that neither the third party written or oral verification is possible, the PHA will rely upon the family's hand-carried information.

All other sources of declared income and assets, will be subject to third-party verification procedures.

3. Applicant Certification/Self-Declaration.

When verification cannot be effectuated by either form of third party verification or review of documents, the family may be required to submit a notarized statement. Notarized statements are only to be used as a last resort.

No government checks will be photocopied. The Document Viewed form will be used to record the verification.

C. RELEASE OF INFORMATION

Families will be asked to sign appropriate release of information forms, as well as a blanket verification. Each member so requested to consent to the release of information will be provided with a copy of the appropriate forms for their review and signature.

Each verification form will contain the appropriate family members' signature as proof of:

- Their consent to the "third party" for release of specified information;
- Evidence of their understanding of the type/nature of information being sought.

A family's refusal or failure to cooperate with the PHA's prescribed verification system will result in the termination of the family's application and/or termination of housing assistance.

D. COMPUTER VERIFICATION

Where authorized by HUD and/or other State or local agencies, computer matching will be done. Where computer card or computer printouts are a feasible method of verification, those sources will be utilized.

E. ITEMS TO BE VERIFIED

All Income unless specifically excluded by the regulations;

Current Assets (for those assets disposed of for less than fair market value in preceding two years, verification will simply be a "self certification");

Social Security Numbers for all family members age 6 and over;

Full-time student ("FTS") Status (as defined by the institution for persons carrying equivalent of what school considers to be full-time for "day" students) — includes High School students who are 18 or over;

Total Medical Expenses for "elderly" families only whose head or spouse is 62 years of age or older or handicapped or disabled according to the HUD definition;

Child Care Expenses are allowed when they permit an adult family member to be gainfully employed or to further their education;

Disability Assistance Expenses may include only those costs associated with attendant care or auxiliary apparatus which allows an adult family member to be gainfully employed;

Family Requesting a Larger Unit than Applicable under the PHA's Occupancy Standards only where family can show that larger unit is needed for "medical purposes" or other extenuating circumstances);

Citizenship or Immigration Status of all Family Members;

Persons Requesting "Preference" Status, based upon preferences approved in the applicable policies pertaining to the various programs;

Zero-Income Status of household will be verified initially and every 90 days thereafter. Families alleging to have no income will be required to execute verification forms to

determine if other

income such as unemployment benefits, AFDC, SSI, etc. are not being received by the household. The responses of these types of income will then serve as third party independent verification.

The PHA may request a credit report on these families to determine if there are any monies being paid on behalf of the household on a regularly recurring basis that should be included as income for rent determination purposes.

F. ACCEPTABLE FORMS OF VERIFICATION:

Specific information must be obtained on verifications to verify the information received by the applicant. The following verification information will be considered acceptable by the PHA in the order listed:

Employment Income:

Any verification form must request the employer to specify the:

- Frequency of pay;
- Effective date of the last pay increase; and
- Probability and effective date of any increase during the next 12 months.

Acceptable forms of verification include (in this order):

1. Employment verification form completed by the employer.
2. Check stubs or earning statements showing employee's gross pay per pay period and frequency of pay.
3. W_2 forms if applicant has had the same job for at least two years and pay increases can be accurately projected.
4. Notarized statements, affidavits or income tax returns signed by the applicant describing self-employment and amount of income or income from tips and other gratuities.

Social Security, Pensions, Supplementary Security Income (SSI), Disability Income:

1. Benefit verification form completed by agency providing the benefits.
2. Award or benefit notification letters prepared and signed by the authorizing

agency. (Since checks or bank deposit slips show only net amounts remaining after deducting SSI or Medicare, they may be used only when award letters cannot be obtained.)

Unemployment Compensation:

1. Verification form completed by the unemployment compensation agency.
2. Records from unemployment office stating payment dates and amounts.

Public Assistance:

1. **All Public Assistance Programs.** Welfare agency's written statements as to type and amount of assistance family is now receiving, and any changes in assistance expected during the next 12 months.

Alimony or Child Support Payments:

- Copy of a separation or settlement agreement or a divorce decree stating amount and type of support and payment schedules.
- A letter from the person paying the support.
- Copy of latest check. PHA must record the date, amount, and number of the check.
- Applicant's notarized statement or affidavit of amount received or that support payments are not being received and the likelihood of support payments being received in the future.

If payments are irregular:

- a. Copy of separation or settlement agreement or a divorce decree stating amount and type of support and payment schedules.
- b. Statement from agency responsible for enforcing payments to show that family has filed.
- c. Applicant's notarized statement or affidavit of amount received.

Earned Income Tax Credit:

- b. For credits applied in one lump sum against tax liability, use Income Tax Return (IRS Form 1040 or 1040A).
- c. For credits applied in one lump sum against tax liability, use IRS Form W_5 (Earned Income Credit Advance Payment Certificate).

Net Income From A Business:

The following documents show income for the prior years. PHAs must consult with tenants and use this data to estimate income for the next 12 months.

1. IRS Tax Return, Form 1040, including any of the following:
 - Schedule C (Small Business);
 - Schedule E (Rental Property Income);
 - Schedule F (Farm Income).
2. An accountant's calculation of depreciation expense, computed using straight-line depreciation rules. (Required when accelerated depreciation was used on the tax return or financial statement.)
3. Audited or unaudited financial statement(s) of the business.
4. Loan Application listing income derived from the business during the previous 12 months.
5. Notarized statement or affidavit as to net income realized from the business during previous years.

Recurring Gifts:

1. Notarized statement or affidavit signed by the person providing the assistance. Must give the purpose, dates and value of gifts.
2. Applicant's notarized statement or affidavit that provides the information in Paragraph H 1 above.

Scholarships, Grants, and Veterans Administration Benefits for Education:

1. Benefactor's written confirmation of amount and purpose of assistance.
2. Statement from the educational institution confirming the purpose of the financial aid.

Family Assets Now Held:

For non-liquid assets, collect enough information to determine the current cash value — the net amount the family would receive if the asset were converted to cash.

1. Verification forms, letters, or documents from a financial institution, broker,

- etc.
2. Passbooks, checking account statements, certificates of deposit, bonds, or financial statements completed by a financial institution or broker.
 3. Quotes from a stock broker or realty agent as to net amount family would receive if they liquidated securities or real estate.
 4. Real estate tax statements if tax authority uses approximately market value.
 5. Copies of closing documents showing the selling price, the distribution of the sales proceeds and the net amount to the borrower.
 6. Appraisals of personal property held as an investment.
 7. Applicant's notarized statements or signed affidavits describing assets or to verifying cash held at the applicant's home or in safe deposit boxes.

Assets Disposed of For Less Than Fair Market Value (FMV) During Two Years Preceding Effective Date of Certification or Re-certification:

1. For all Certifications and Re-certifications, the PHA will obtain the Family's certification as to whether any member has disposed of assets for less than fair market value during the two years preceding effective date of the certification or re-certification.
2. If the family certifies that they did dispose of assets for less than fair market value — a certification that shows: (a) all assets disposed of for less than FMV; (b) the date they disposed of the assets; (c) the amount the family received; and (d) the asset's market value at the time of disposition.

Saving Account Interest Income and Dividends:

1. Account statements, passbooks, certificates of deposit, etc., if they show enough information and are signed by the financial institution.
2. Broker's quarterly statements showing value of stocks, bonds or the earnings credited the applicant.
3. If the IRS accepts an IRS Form 1099 from the financial institution, the PHA must adjust the information to project earnings expected for the next 12 months.

Interest Income From Sale of Real Property Pursuant to a Purchase Money Mortgage, Installment Sales Contract, or Similar Arrangement:

1. A letter from an accountant, attorney, real estate broker, the buyer, or a financial institution stating interest due for next 12 months.
2. Amortization schedule showing interest for the 12 months following the

- effective date of the certification.
3. If the IRS accepts an IRS Form 1099 from the financial institution, the PHA must adjust the information to project earnings expected for the next 12 months.

Rental Income from Property Owned by Applicant: (PHAs must adjust these amounts for changes expected during the next 12 months.)

1. IRS Form 1040 with Schedule E (Rental Income).
2. Copies of latest rent checks, leases, or utility bills.
3. Documentation of applicant's income and expenses in renting the property (tax statements, insurance premiums, receipts for reasonable maintenance and utilities, bank statements or amortization schedules showing monthly interest expense).
4. Lessee's written statement identifying monthly payments due the applicant and applicant's affidavit as to net income realized.

Full-Time Student Status:

1. Written verification from the registrar's office or appropriate school official.
2. School records indicating enrollment for sufficient number of credits to be considered a full-time student by the school.

Child Care Expenses:

1. Written verification from the person who receives the payments. If the child care provider is an individual, they must provide a notarized statement of the amount they are charging the tenants for their services.
2. Verifications must specify the child care provider's name, address, and phone, the names of the children cared for, and the frequency (number of times the babysitting occurs), the rate of pay, and the typical yearly amount, including school and vacation periods.
3. Applicant's certification as to whether any of those payments have been or will be reimbursed by outside sources.

Medical Expenses:

1. Written verification by a doctor, hospital or clinic personnel, dentist, pharmacist, etc., of:

- a. the estimated medical costs to be incurred by the applicant and of regular payments due on medical bills;
 - b. the extent to which those expenses will be reimbursed by insurance or a government agency.
2. The insurance company's or employer's written confirmation of health insurance premiums to be paid by the applicant.
 3. Social Security Administration's written confirmation of medicare premiums to be paid by the applicant over the next 12 months.
 4. For attendant care:
 - a. Doctor's certification that the assistance of an attendant is medically necessary;
 - b. Attendant's written confirmation of hours of care provided and the amount and frequency of payments received from the family (or copies of canceled checks the family used to make those payments);
 - c. Applicant's certification as to whether any of those payments have been or will be reimbursed by outside sources.
 4. Receipts, canceled checks, or pay stubs that indicate health insurance premium costs, etc., that verify medical and insurance expenses also likely to be incurred in the next 12 months.
 5. Copies of payment agreements with medical facilities or canceled checks that verify payments made on outstanding medical bills that will continue over all or part of the next 12 months.
 6. Receipts or other record of medical expenses incurred during the past 12 months that can be used to anticipate future medical expenses. PHA may use this approach for "general medical expenses" such as non-prescription drugs and regular visits to doctors or dentists, but not for one-time, nonrecurring expenses from the previous year.

The PHA will use mileage at the rate approved by the Board for the PHA or cab receipts with to/from addresses listed for verification of the cost of transportation directly related to medical treatment.

Medical Need for Larger Unit:

A physician must certify that such arrangements are medically necessary. The family member must be under the direct and present care of the physician.

Assistance to Disabled persons:

1. Attendant Care:

- a. Attendant's written certification as to the amount received from the applicant/tenant; frequency of receipt; hours of care provided; and/or copies of canceled checks applicant/tenant used to make those payments;
- b. Certifications required below.

2. Auxiliary Apparatus:

- b. Receipts for purchases of, or evidence of monthly payments for, auxiliary apparatus;
- c. In the case where the disabled person is employed, a statement from the employer that the auxiliary apparatus is necessary for employment.

3. In All Cases:

- a. Written certification from a physician or a rehabilitation agency that the disabled person requires the services of an attendant or the use of auxiliary apparatus to permit the disabled person to be employed or to function sufficiently independently to enable another family member to be employed.
- b. Family's written certification as to whether they receive reimbursement for any of the expenses in paragraph one and two above and the amount of any reimbursement received.

G. VERIFYING FACTORS OF ELIGIBILITY

The following types of verification will be acceptable as methods to document tenants' statements regarding family status.

To verify blood relationship, use drivers license or work ID to verify name.

For marriage, use legal certificate of marriage to verify relationship.

For stable family relationship, use these types of proof:

- a. Joint bank accounts or loans;
- b. Prior or current lease or rental agreements documenting cohabitation;
- c. Credit report showing residence and joint financial activity.

There must be verification of all family members. Birth certificates or other evidence to document identification must be submitted.

Verification for adults would include one of these forms:

- b. Certificate of Birth, naturalization papers;
- c. Church issued baptismal certificate;
- d. Legal driver's license;
- e. US military discharge;
- f. US passport;
- g. Voter's registration;
- h. Company ID;
- i. Health and Human Services ID;
- j. Social Security ID.

Verification for minors would include one of these forms:

- a. Certificate of Birth;
- b. Adoption papers;
- c. Custody agreement;
- d. Health and Human Services ID;
- e. School records.

Verification of divorce status would be accomplished by viewing a copy of the divorce decree, signed by a Court Officer.

Verification of a separation would be a copy of court-ordered maintenance.

Verification of guardianship would be:

- b. Court-ordered assignment;
- c. Notarized declaration of parent;
- d. Verification from social services agency;
- e. School records.

H. VERIFICATION OF CITIZENSHIP OR IMMIGRATION STATUS

Unless the PHA has a reason to doubt a family's claim of U.S. citizenship, the PHA will not verify U.S. citizenship.

If a family claims that any or all of the family members are aliens, the PHA will request to view any of the following original documents:

- a. Resident Alien Card (I-551);
- b. Alien Registration Receipt Card (I-151);
- c. Arrival Departure Record (I-94);
- d. Temporary Resident Card (I-688);
- e. Employment Authorization Card (I-688B);
- f. Receipt issued by INS for issuance of replacement of any of the above documents;
- g. Other accepted evidence as announced by INS.

The PHA will utilize the INS SAVE system to verify immigration status.

I. EXEMPTION TO MINIMUM RENT REQUIREMENT

Loss of benefits — TANF, Social Security, or other forms of assistance: Third party verification from the administrative agency specifying the reason for loss or reduction of benefits.

Applying for benefits — TANF, Social Security or other forms of assistance: Third party verification from the administrative agency acknowledging that an application was received from the family.

Eviction — Copy of eviction notice from the family's landlord. The eviction notice must specify the reason(s) for the eviction.

Loss of income — Third party verification from the employer confirming the loss of income.

Death of family member — Copy of death certificate or an obituary notice which clearly indicates the relationship between the family head and the deceased person.

J. ACCOMMODATION DUE TO HARDSHIP

Requests for reasonable accommodation from persons with disabilities will be granted upon verification that they meet the need presented by the disability and they do not create

an undue financial and administrative burden for the PHA, meaning an action requiring significant difficulty or expense. In determining whether the accommodation would create an undue hardship, the following guidelines would apply:

- b. The nature and cost of the accommodation needed;
- c. The number of persons likely to need such an accommodation and the likely impact on the operation of the Section 8 Program as a result of the accommodation.

All requests for accommodation or modification will be verified with reliable, knowledgeable professionals.

IX. BRIEFING OF FAMILIES AND ISSUANCE OF CERTIFICATES/VOUCHERS

A. BRIEFINGS

1. Purpose of the Briefing:

The purpose of the briefing is to explain the Certificate or Voucher holder_s packet to each family. The family will also be informed of their Section 8 family obligations.

2. Briefing Attendance Requirement:

All families are required to attend the briefing class when they are initially issued a Certificate or Voucher. No Certificate or Voucher will be issued unless the head (and spouse, if applicable) has attended a briefing class.

A family who provides prior notice of their inability to attend a briefing class will be scheduled for the next briefing class. Only one rescheduled class is permitted.

Failure of a family to participate in a scheduled briefing class may result in withdrawal of their application. The family will be notified of their withdrawal from the wait list and of their right to an informal review.

3. Format of the Briefing:

Briefing of Certificate or Voucher holders is generally handled on a group basis by a Section 8 staff member. When group briefings are conducted, families are given the opportunity to ask questions, especially those related to their Total Tenant Payment calculation (or Housing Voucher Subsidy calculation in the case of a Voucher) and how utility allowances are calculated. Families will be requested to sign relevant documents, including their Certificate/Voucher, prior to the briefing.

Certificate holders are briefed separately from Voucher holders.

The family will be provided a certificate or voucher briefing packet that will contain the items required by HUD regulations.

In addition to supplying the family with a briefing information packet, the PHA will conduct an oral briefing which will include information on the following subjects:

- A description of how the program works;

- Family and owner responsibilities;
- Where the family may lease a unit - outside or inside of the PHA_s jurisdiction;
- Explanation on portability policies and procedures;
- Explanation of the advantages of moving to an area;
- that does not have a high concentration of low income families;
- Briefing packet items;
- Exception Rents for certificate families;
- Exception Rent Payment Standards for Voucher families;
- Over FMR tenancies with the Certificate Program.

4. Household Obligations under the Section 8 Program:

Under the Section 8 Existing or Housing Voucher Program, the relationship between tenant and landlord are the same as in the private housing market.

However, once the family receives a Section 8 Certificate, the family has the following additional obligations:

- Finding a rental unit which is the correct size (for the Certificate Program within the Fair Market Rent prescribed by regulation or exception and meets the minimum standards of HQS for size of the unit);
- Turning in the Request For Lease Approval Form to the PHA within the Certificate or Voucher period for PHA approval;
- Keeping appointments set by the PHA for determination of continued eligibility and unit compliance with HQS;
- Notifying the PHA in a timely manner, as defined in this Section XV of this Administrative Plan, of changes in household composition and income;
- Notifying their owner and the PHA prior to moving from their unit;
- Complying with other obligations of the family as listed on the family_s Certificate or Voucher.

5. Owner Referrals:

Certificate and Voucher holders are notified at their briefing session that the PHA updates the listing of available housing and makes it available at the PHA_s offices.

6. PHA Policy on Furnishing Information to Prospective Landlords:

Upon a prospective landlord_s written request, the PHA will furnish the family_s current

address and the name and address of the family's current and previous landlord if the information is available from the PHA's records. No other information will be furnished without the written consent of the family.

B. SECURITY DEPOSIT REQUIREMENTS

The owner may collect a security deposit from the family that is not in excess of private market practice. The PHA will allow a prospective owner to collect a security deposit of not more than one month's PHA-approved contract rent from the family. When the tenant moves from the unit, the owner, subject to local and state law, may use the security deposit for unpaid rent, unit damages, or for other amounts the family owes under the lease. Owners must comply with HUD regulations in order to participate in the Section 8 Program.

C. CERTIFICATE AND VOUCHER ISSUANCE

At the briefing session, each family will be issued a Certificate of Family Participation or Housing Voucher which is a contract between the PHA and the household specifying the rights and responsibilities of each party.

1. Expirations:

The Certificate or Voucher is valid for a period of 60 days from the date of issuance. Prior to expiration, the family may contact the PHA to inquire about assistance the PHA can provide the family in locating suitable housing.

The family must submit a Request for Lease Approval and Lease within the 60-day period unless an extension has been granted by the PHA.

2. Extensions:

A family may request an extension of the Certificate/Voucher time period. All requests for extensions must be received prior to the expiration date of the Certificate/Voucher, unless the expiration date falls on a weekend or holiday.

Extensions are permissible at the sole discretion of the PHA primarily for the following reasons:

- Extenuating circumstances such as hospitalization or a family emergency for an extended period of time which has affected the family's ability to find a unit within the initial 60 day period. Verification is required.
- The family has evidenced that they have made a good faith effort to locate a

unit and request support services from the Housing Counselor, throughout the initial 60 day period with regard to their inability to locate a unit (especially applicable to large families.)

- The family has submitted a Request for Lease Approval prior to the expiration of the 60-day period, but the unit has not passed a Housing Quality Standards inspection.
- The family is disabled and requests accommodation pursuant to HUD regulations.

The PHA staff extends in one or more increments, generally of 2 weeks each, not to exceed an additional 30 days. Unless approved by the Coordinator, no more than two extensions will be granted. The maximum time period for a Certificate or Voucher cannot exceed 120 days. Disabled families must obtain HUD approval beyond 120 days.

D. PORTABILITY OF CERTIFICATES AND VOUCHERS

1. General Policies:

A family issued a certificate or voucher may lease a unit anywhere in the jurisdiction of the PHA or outside the PHA jurisdiction as long as household head or spouse already had established a legal domicile in the PHA_s jurisdiction at the time the family first submitted an application for participation in the Section 8 Program.

If the family did not establish a legal domicile at the time of the family's application, the family does not have any legal right to lease a unit outside of the PHA_s jurisdiction within the first 12 months after the family is initially admitted to the Section 8 Program. An exception may be granted by the PHA if the family cites economic or personal hardship that can be documented and if the family obtains the approval of the "receiving housing authority."

2. Income Eligibility:

a. Admission to the Section 8 Program

A family must become eligible to be admitted to the Existing Certificate or Housing Voucher Program where the family initially leases a unit. In the event of a family who under portability rules, transfers their certificate or voucher to a _receiving housing authority_, the family must meet income eligibility guidelines of the receiving housing authority.

b. Current Participants

If the portable family is already a participant in the initial housing authority's Section 8 Program, income eligibility is not redetermined unless the family transfers between the Certificate and Voucher Programs.

3. Initial Housing Authority Administration of Portability:

When the PHA becomes the "initial housing authority", the PHA will comply with HUD regulations.

4. Receiving Housing Authority Administration of Portability:

When the PHA becomes the "receiving housing authority", the PHA will decide the type of housing assistance that will be provided to the portable family. The PHA may change the type of housing assistance if the family is not income eligible for the type of housing assistance.

Other aspects of administration will be subject to HUD regulations and the PHA's internal Section 8 administrative policies.

X. LOCATING SUITABLE HOUSING

A. RESPONSIBILITY FOR LOCATING HOUSING

After a Certificate or Voucher has been issued to the family, it is the family's responsibility to locate suitable housing. This means that the housing must be within the rent limitations set by the Section 8 Program and meet Housing Quality Standards requirements, including minimum bedroom size requirements for units.

The PHA will maintain updated referral lists of owners who have called the PHA to list their available units. The list will be made available to Certificate and Voucher holders upon request.

Referrals lists will be available in the PHA office lobby and on the PHA's bulletin board.

B. ELIGIBLE TYPES OF HOUSING

The following types of housing may be utilized in the Certificate and Voucher program (unless designated otherwise):

- All structure types can be utilized, including but not limited to single family, duplex, or multifamily garden apartments, town houses, and high rises;
- Manufactured homes where the tenant leases the mobile home and the pad;
- Manufactured homes where the tenant owns the mobile home and leases the pad (Certificate Program only);
- Independent Group Residences;
- Congregate Housing.

Housing owned by the family being subsidized is prohibited except for manufactured homes identified above for the Certificate Program only.

C. REQUEST FOR LEASE APPROVAL AND LEASE

The Request for Lease Approval and the Owner_s Lease must be submitted prior to the expiration of the Certificate or Housing Voucher, unless the Certificate or Voucher has been extended by the PHA.

The Request for Lease Approval Form must be signed and submitted to the PHA by both owner and Certificate/Voucher holder with an unsigned copy of the lease that the owner will be using for the unit.

The PHA will approve the lease and the Request for Lease Approval Form if the lease conforms to HUD and PHA requirements and if the Request for Lease Approval Form is properly executed by both parties. The PHA reserves the right to reject the Request for Lease Approval if the gross rent (proposed contract rent plus tenant paid utilities) exceeds the Fair Market Rent of the family's Certificate bedroom size and is not supported by a comparable rent analysis.

D. VOUCHER AFFORDABILITY INDEX

The PHA will not approve a unit for a Voucher Contract if a family's rent burden exceeds 40%. The PHA believes that an excessive rent burden is a strong indication of under reporting of income to the PHA. Rent burden for the Voucher Program is defined as the amount that a family must pay toward rent, utilities, child care, and unreimbursed medical expenses as a percentage of the family's adjusted monthly income that has been reported to the PHA.

E. OVER FMR TENANCY AFFORDABILITY INDEX

The PHA will not approve a unit for an Over FMR tenancy Contract if a family's rent burden exceeds 40%. Rent burden is defined as the amount that a family must pay toward rent, utilities, child care, and unreimbursed medical expenses as a percentage of the family's adjusted monthly income that has been reported to the PHA.

F. PHA DISAPPROVAL OF OWNER

The PHA will not approve an owner's unit if HUD has informed the PHA that the owner is debarred, suspended, or subject to limited denial of participation. HUD may also direct the PHA deny an owner to participate for violations of fair housing or other federal equal opportunity requirements.

The PHA may also deny approval to lease a unit from an owner if the owner has:

- Violated owner obligations under a Section 8 housing assistance payments contract;
- Committed fraud, bribery, or any other current or criminal act in connection with any federal housing program;
- Engaged in drug trafficking;
- A history or practice of non-compliance with HQS for units assisted by the PHA's Section 8 Program;

- Not paid State or local real estate taxes or fines.

XI. HOUSING QUALITY AND STANDARDS AND INSPECTIONS POLICIES

A. GENERAL PURPOSE

The PHA is required by HUD regulations to inspect the unit to ensure that it complies with Housing Quality Standards.

No unit will be initially placed on the Section 8 Existing Housing Program unless these standards are met. Units must also meet the Housing Quality Standards to remain under contract with the PHA.

There are **five** types of inspections the PHA will perform:

- Initial
- Annual
- Complaint
- Move-Out (if applicable)
- Quality Control

The Housing Quality Standards take precedence over local housing codes and other pertinent codes.

B. ACCEPTABILITY CRITERIA AND EXCEPTIONS TO HQS

The PHA adheres to the acceptability criteria in the Section 8 Program regulations and HUD Inspection Booklet with the following exceptions:

- The PHA has initiated the following policy to ensure that units meet the Interior Air Quality requirements that "the unit must have adequate air circulation." Units that have not been provided an air conditioning unit or evaporative cooler by the landlord will be required to have screens on one exterior window per room, if the window can be opened.
- Landlords will be required to scrape peeling paint and repaint all surfaces cited for peeling paint with 2 coats of non-lead paint or otherwise suitably cover the area. An extension may be granted as a severe weather-related item as defined below.
- Adequate heat shall be considered to be 68 degrees.
- The PHA may fail unsanitary conditions where exposed food, garbage, and excrement exists to a degree where health may be endangered.
- Plastic trash bags will not be considered "adequate covered facilities" in

buildings with 4 or more units. Suitable containers for the temporary storage of refuse must be used.

- In units where the tenant must pay for utilities, each unit must have separate metering device(s) for measuring utility consumption.

Severe weather related items such as exterior painting and outside concrete work for porches, steps, and sidewalks will be given a deadline to correct the item if the outside temperature or weather prohibits the repair or replacement for compliance with Housing Quality Standards. If the unit does not pass inspection at a later time specified by the PHA, the PHA may abate rent and cancel the HAP Contract for owner noncompliance.

At the PHA's sole discretion, extensions of up to 30 days may be granted to permit a landlord to complete repairs if the landlord has made a good faith effort to initiate repairs. If repairs are not completed within 60 days after the initial inspection date, the PHA may abate rent and cancel the HAP contract for owner noncompliance.

C. CLEARING DEFICIENCIES FOR INITIAL INSPECTIONS

The PHA will schedule a timely inspection of the unit on the date the owner indicates the unit will be ready for inspection or as soon as possible thereafter (generally within ten working days) upon receipt of a Request for Lease Approval and Lease. The family and the owner will be notified of the results. If the unit fails the Housing Quality Standards inspection, the family and the owner will be advised to notify the PHA once the repairs are completed.

On an initial inspection, the owner will generally be given up to 30 days to correct the items noted as "Fail," depending on the extent of the repairs that are required to be made.

The PHA also reserves the right to refuse to conduct the inspection if the unit is not ready for inspection.

The owner will generally only be allowed up to two re-inspections for repair work to be completed, at the Inspector's discretion.

When a family properly submits a unit for PHA inspection, the "clock" stops on the amount of time (initially 60 days) for the family to find suitable housing. The "clock" restarts when the PHA rejects the unit and requests the family to submit another unit to be placed under a HAP contract.

D. DEADLINE FOR CORRECTING HQS FAIL ITEMS FOR CONTRACT UNITS

The owner or tenant must be given time to correct the failed items cited on the inspection report for a unit under contract. If the item endangers the family's health or safety (using the emergency item list below), the owner or tenant must be given 24 hours to correct the violations. For less serious failures, the owner or tenant may be given up to 30 days to correct the item(s)

E. EMERGENCY FAIL ITEMS

The following items are to be considered of an emergency nature and are to be corrected by the owner or tenant within 24 hours of notice by the Inspector:

- Broken lock on first floor window or door;
- Electrical outlet smoking or sparking;
- Entire window, including storm window, missing (weather problem);
- Escaping gas from gas stove;
- Major plumbing leak(s);
- Natural gas leak or fumes;
- Electrical situation which could result in shock or fire;
- Inability to maintain 68°F room temperature;
- No water;
- No electricity.

The PHA may give a short extension (not more than 48 additional hours) where the owner or tenant cannot be notified or it is impossible to repair within the 24 hour period.

If emergency items that are the owner's responsibility are not corrected within 72 hours, the HAP Contract will be canceled.

If emergency items are the tenant's responsibility to correct and are not corrected within 72 hours, the PHA will propose termination by sending written notice to the tenant and owner. The tenant will be offered an informal hearing before the PHA takes final action. The tenant and owner shall be given written notice of the PHA's decision to terminate housing assistance.

F. ABATEMENT POLICIES

When it has been determined that a unit on the program fails to meet Housing Quality Standards and the owner has been given an opportunity to correct the problem(s) and does not do so within the time frame established by the PHA (up to 30 days), the rent for the unit shall be abated.

The initial abatement period shall be 10 days or less. If the correction is not made, the abatement will continue through the HAP Contract cancellation notice.

The PHA will inspect abated units within 3_5 days of the owner's contact with the PHA to report the completed work.

The abatement will end the first business day following the owner's call if the unit passes inspection.

The owner will not be abated for tenant caused HQS violations. Tenants will be given up to 30 days to correct any deficiencies. If the repairs are not completed by the deadline, the PHA will send a proposed notice of termination to the tenant and the owner.

G. HAP CONTRACT TERMINATION FOR OWNER CAUSED HQS VIOLATIONS

If the owner fails to correct all the items within the initial ten day abatement period, the PHA will send a contract termination notice to the owner and tenant. During this period (minimum 30 days notice prior to the first of the month), the abatement will remain in effect.

When the Housing Assistance Payments Contract or the Voucher Subsidy Contract is terminated for Housing Quality Standards violation(s), it cannot be reinstated unless the repairs are done and the PHA is notified before the effective termination date. The tenant must also agree to remain in the unit.

If the HAP Contract termination notice has been sent to the owner, only one additional Housing Quality Standards inspection will be conducted to verify if repairs have been completed.

H. HAP CONTRACT TERMINATIONS FOR TENANT CAUSED HQS VIOLATIONS

If the tenant fails to make the required repairs by the PHA_s deadline, the PHA will send a proposed notice of termination to the tenant and owner. The proposed termination notice will offer the tenant an opportunity to request an informal hearing with the PHA. If the tenant fails to request an informal hearing with the PHA within the designated deadline, the PHA will send a final notice of termination to the tenant and owner. The final notice will be 30 day advanced written notice to the owner. The owner will continue to receive a housing subsidy until the final effective termination date.

If the tenant is granted an informal hearing, the owner will continue to receive a housing subsidy until otherwise notified in writing by the PHA.

I. RESPONSIBILITY OF THE FAMILY TO ALLOW INSPECTION

The PHA must be allowed to inspect the unit at reasonable times with reasonable notice. The family is notified of the inspection appointment by mail. If the family is not able to be at home, the family must call to reschedule the inspection or make arrangements to have an adult family representative or the landlord present.

If the family misses the inspection appointment and does not arrange for the representative or the landlord to be there, one more inspection (or reinspection) appointment will be scheduled.

If the family misses two inspection appointments, the PHA will consider the family to have violated a family obligation and their assistance will be terminated, following the termination of assistance procedures.

XII. LEASE APPROVAL AND HAP/VOUCHER CONTRACT EXECUTION

A. DOCUMENTS SUBMITTED

Landlords may use their own lease if the lease complies with the HUD regulations and State and local law. The PHA will not generally review the lease for compliance with state and local law. All landlord leases will be amended by the HUD Lease Addendum form.

The family is required to submit the Lease and Request for Lease Approval prior to the expiration of the Certificate or Voucher. The PHA will only process one Request for Lease Approval at a time. The PHA will notify the tenant and the landlord if the unit and lease have been approved or rejected.

Owners must also submit proof of ownership of the property and/or the Management Agreement if the property is managed by a management agent. Proof of Ownership may be in the form of deeds, property tax invoices, property insurance documents or closing statement forms. Land Contracts recorded at the Franklin County Auditor's office are also acceptable. Purchase contracts and subleasing agreements are unacceptable.

B. FAIR MARKET RENT LIMITATIONS

The gross rent (contract rent plus tenant-paid utilities) for a Certificate Program unit shall not exceed the Fair Market Rent applicable for such units on the date of Lease approval unless an accommodation is being made for a disabled family (up to 120% of the Fair Market Rent) or the PHA has approved an Over FMR tenancy. In either case, a rent reasonableness determination must be conducted by the PHA.

C. EXCEPTION RENT AREAS

Exception rents for suburban areas have been approved by the local HUD office and are on file at the PHA's offices. These exception rent areas have been authorized by HUD.

D. OVER FAIR MARKET RENT TENANCY

An Over Fair Market Rent (FMR) tenancy permits a Certificate family to rent a unit without considering the Fair Market Rent ceiling. Because the gross rent (contract rent plus utility allowance) exceeds the Fair Market Rent, the family may pay more than 30 percent of their adjusted monthly income toward rent and utilities.

The PHA may approve up to 10 percent of incremental allocations of HUD approved

budgeted Certificate units for Over FMR tenancies, excluding units awarded to the PHA for conversions of Section 8 project-based units to tenant-based assistance.

Over FMR tenancies for Certificate families will be approved individually, on a first come, first serve basis at the sole discretion of the PHA.

No additional Over FMR tenancies will be approved if the maximum number of Over FMR tenancies is attained.

E. RENT REASONABLENESS DETERMINATION FOR CERTIFICATES AND FOR CERTIFICATES APPROVED FOR OVER FMR TENANCIES

The PHA will make a determination as to whether the rent to an owner is a reasonable rent in comparison to rent charged for other comparable unassisted units.

Rent reasonableness determinations are made when units are placed under HAP contract for the first time; if an owner requests a rent increase; if there is a 5 percent decrease in the HUD published Fair Market Rents; if HUD so directs the PHA to conduct a rent comparability analysis on a unit(s); or the PHA, in its sole discretion elects to do so.

The PHA will determine, on a case-by-case basis, that the approved rent:

- Does not exceed the maximum rent allowed by HUD;
- Does not exceed rents charged by the owner for comparable unassisted units in the premises;
- Is reasonable in relation to rents charged by the owner for comparable unassisted units in the open market.

When comparing Section 8 assisted units with open market units, the PHA will consider the location, quality, size, unit type, age, amenities, housing services, maintenance and utilities to be provided by the owner.

The PHA utilizes a database with the above listed information and rental rates on unassisted rental units in the metropolitan area to determine a reasonable rent for a Section 8-assisted unit. The PHA will inspect the Section 8 property and evaluate it based upon its comparability to nearby unassisted units, using numerical values to evaluate the unit and compare it to other units. The PHA reserves the right to make adjustments to an owner's requested rent based upon the above indicators in evaluating properties for rent reasonableness.

The PHA will maintain records which include comparable data on open market units and

the evaluation of the Section 8 unit. These factors are utilized to determine a reasonable rent.

The PHA may complete rent reasonableness for multifamily properties issuing a "blanket determination" for approving Section 8 contract rents at the multifamily property. A "blanket determination" rent is made after reviewing the open market rents at the property and those of nearby comparable properties. The PHA reserves the right to make a determination of a reasonable rent utilizing its best judgment under unusual or extraordinary circumstances including, but not limited to, a high vacancy rate; the absence of comparable data; or other factors which may affect the rent of a Section 8 assisted property. Such determinations require the approval of the Director of Section 8 Programs.

F. RENT REASONABLENESS DETERMINATION FOR VOUCHERS

The PHA shall advise the family as to whether the rent is reasonable and shall assist in the negotiation of the rent with the owner if requested by the family. Rents for the Voucher Program are subject to PHA's test of rent reasonableness and must not exceed Certificate Program rents for similar comparable units.

The PHA will conduct rent reasonable tests for the Housing Voucher Program using the same methodology as the Certificate Program.

G. SEPARATE AGREEMENTS

Owners and families may execute agreements for services, appliances, and other items outside those which are provided under the lease if the agreement is in writing and approved by the PHA. If the owner does not provide a range or refrigerator, the PHA may lower the contract rent.

Any appliance, service or other item which is routinely provided to unassisted tenants as part of the lease (such as air conditioning, dishwasher or garage) or is permanently installed in the unit cannot be put under separate agreement and must be included in the lease.

For there to be a separate agreement, the family must have the option of not utilizing the service, appliance or other item.

The PHA is not liable for unpaid charges for items covered by separate agreements and nonpayment of these agreements.

If the family and owner have come to an agreement on the amount of charges for specific

items, the charges will be approved if they are reasonable and not a substitute for higher rent.

Copies of all separate agreements must be provided to the PHA.

H. UNIT APPROVAL/DISAPPROVAL

After the PHA has reviewed the Request for Lease Approval and Lease, determined rent reasonableness, conducted an inspection and passed the unit, checked the Certificate/Voucher unit against the Fair Market Rent and found it to be less or approved an Exception Rent, the PHA will approve and process the HAP Contract.

If the PHA determines that the lease cannot be approved for any reason, the landlord and the family will be notified. The PHA will explain the problems to the owner and suggest how they may be corrected.

If the proposed Gross Rent exceeds the FMR, the PHA will discuss with the landlord the possibility of either reducing the Contract Rent or including some or all of the utilities in the Contract Rent or, if the unit is determined to be rent reasonable and exception rent authority is available, the PHA may grant an exception rent.

If the owner accepts the PHA's offer of a revised rent, the PHA will continue processing the Request for Lease Approval and Lease.

If the owner does not agree on the contract rent after the PHA has attempted to negotiate a revised rent, the PHA will inform the family that the lease cannot be approved. The family should continue efforts to locate eligible housing before the Certificate/Voucher expires.

I. HAP CONTRACT EXECUTION

Prior to HAP Contract execution, the PHA will review the family's composition and information about income and allowances. If significant changes have occurred, the information will be verified and the Total Tenant Payment will be recalculated in accordance with HUD and PHA policies.

When the lease approval process is completed, the PHA will notify the landlord and the family of the lease approval or disapproval.

If the lease is approved, the PHA will prepare the HAP Contract and Lease Addendum. In preparing the documents, the PHA will compute the Total Tenant Payment, Tenant Rent, Utility Reimbursement (if any), and the Housing Assistance Payment.

When the leasing documents are prepared, the PHA will have the documents executed by the family, owner, and the PHA and send appropriate copies to each party and retain copies for the file.

Generally, families and owners will be required to come to the PHA's offices to execute the required documents. The documents may also be mailed out for signature with the Housing Assistance Manager's approval in hardship cases.

XIII. OWNER PAYMENT AND UTILITY ALLOWANCE

A. OWNER PAYMENT IN THE CERTIFICATE AND HOUSING VOUCHER PROGRAM

The payment to the landlord is based upon Contract Rent approved by the PHA less the Tenant Rent as determined by the PHA.

The payment to the landlord is called the Housing Assistance Payment.

B. OWNER PAYMENT IN THE VOUCHER PROGRAM

Rents are restricted by the Fair Market Rent or by rent reasonableness in the Voucher Program. The rent amount approved by the PHA impacts the calculation of Housing Assistance Payment provided by the PHA as noted in the Housing Voucher Contract.

The maximum subsidy level for each family is determined by the Payment Standard for the family less 30% of the family's Monthly Adjusted Income. The actual subsidy level could be less if the family is required to pay the Minimum Total Tenant Payment (10% of the family's Monthly Income.)

The Payment Standard to be used in the calculation is based on the Voucher size the family holds.

The Housing Assistance Payment to the Owner is the lesser of:

- the actual Housing Voucher Subsidy described above; or
- the rent to Owner (similar to Contract Rent in the Certificate Program).

Payment Standards are reviewed annually and will be adjusted in accordance with Section XXIV — Payments Standards for the Voucher Program.

C. UTILITY ALLOWANCE

The same Utility Allowance Schedule is used for both Certificates and Vouchers.

If the family pays for some or all utilities, the PHA will provide the family with a utility allowance. The allowances are based on actual rates and average consumption estimates, not on a family's actual energy consumption.

The PHA will review the Utility Allowance Schedule on an annual basis. If a revision is needed, based on methods required by HUD, the Utility Allowance Schedule will be revised.

Approved utility allowance schedule(s) will be given to families along with their Certificate of Family Participation or Housing Voucher. The same schedule(s) will be used by the PHA to record the actual allowance for the unit the family selects if there are tenant-paid utilities.

Where families provide their own range and refrigerator, the PHA will establish an allowance adequate for the family to purchase or rent a range or refrigerator, even if the family already owns either appliance.

Allowances for ranges and refrigerators will be based on the lesser of the cost of leasing or purchasing the appropriate appliance, based on factors provided by HUD.

D. MAKING PAYMENTS TO OWNERS

Once the HAP Contract is executed, the PHA begins processing payments to the landlord.

The effective date and the amount of the HAP payment is communicated in written form to the staff person responsible for maintaining the HAP Register.

A HAP Register will be used as a basis for monitoring the accuracy and timeliness of payments.

The PHA maintains a Tenant Directory by ACC for monthly changes to be made. The PHA is automated and the changes are made automatically to the HAP Register for the following month.

Checks are disbursed by the PHA to the owner each month.

E. UTILITY REIMBURSEMENT PAYMENTS

Where the Utility Allowance exceeds the Total Tenant Payment of the family, the PHA will provide a Utility Reimbursement Payment to the family each month.

The check will be made out directly to the tenant.

XIV. ANNUAL ACTIVITIES

There are three activities the PHA conducts on an annual basis. These activities will be coordinated whenever possible:

- Annual Re-certification of Income;
- Annual HQS Inspection;
- Contract Rent Increase Requested by Owner.

The PHA maintains a listing of units under contract by month to ensure systematic reviews of contract rent, allowances for utilities and other services, and housing quality in accordance with the requirement for annual reexamination. Monetary changes are made automatically to the HAP Register to affect a change at the desired effective date.

A. ANNUAL RECERTIFICATION

Families will be requested to provide information on income, assets, allowances and deductions, and family composition at least annually.

Annual recertifications for mid-month move-ins (e.g. September 15th) will be conducted no later than the following year by the first of the move-in month (e.g. September 1st).

When families move to another dwelling unit, a recertification will be scheduled unless the last recertification was completed less than 90 days prior to lease and contract termination.

1. Reexamination Notice to the Family:

The PHA will maintain a reexamination tracking system and at least 90_120 days in advance of the scheduled annual reexamination effective date, the head of household will be notified by mail that s/he is required to attend a reexamination interview on a specified date (or rearrange a date in advance if the scheduled date is unacceptable.)

2. Verification of Information Provided:

The policies and procedures outlined in Section VIII, Verification Procedures, will be used by the staff for annual recertifications.

3. Changes in Tenant Rent:

When the information is analyzed, all necessary documents are

prepared and signed by the tenant, and all other requirements have been met, the PHA will recalculate the tenant's portion of rent.

The PHA will notify both the owner and tenant of its determination and of the new rent to be paid by the tenant (and new Housing Assistance Payment to be paid by the PHA) if applicable.

If there is a rent increase, the new rent portion will go into effect following a full thirty day notice prior to the first of the month. (If there has been misrepresentation by the tenant, or if the tenant caused a delay in the reexamination processing, there may be an increase in rent made retroactively.)

If there is a rent decrease, it will be effective on the scheduled effective reexamination date (unless the family has caused a delay in reexamination processing.)

B. ANNUAL HQS INSPECTION

General Policy:

The PHA will conduct an inspection using the Housing Quality Standards (and other standards approved in this Administrative Plan) at least annually.

Annual inspections for mid-month move-ins (e.g. September 15th) will be conducted no later than the following year by the first of the move-in month (e.g. September 1st.)

HQS fails must be corrected by the owner if the fail items were caused by normal wear and tear. HQS fails caused by the tenant or family members or guests of the tenant must also be corrected by the PHA's inspection deadline.

C. RENT INCREASES BY OWNER

1. Certificate Program.

Certificate Program owners must request a rent increase in writing. Rent increases to owners under the Certificate Program are to be effective on or after the anniversary date of the HAP Contract.

Rent increases for mid-month move-ins (e.g. September 15th) will be granted no earlier than a year from the first of the month following move-in (e.g. October 1st.)

The PHA will determine on a case-by-case basis that the approved rent:

- Does not exceed rents charged by the owner for comparable unassisted units in the private market;
- Is reasonable in relation to rents charged by other owners for comparable units in the private market;
- Rent increase requests do not exceed the applicable Annual Adjustment Factor as published by HUD.

Documentation on comparable unassisted rents will be maintained in Rent Reasonableness Records.

If the owner rejects the PHA's proposed rent after the first term of the lease, the PHA shall advise the owner the option of offering the tenant a new lease. The PHA and tenant must approve the new lease.

2. Voucher Program.

Owners may not request a rent increase in the Voucher Program prior to the expiration of the first term of the lease. Rent increases may be effective with a 60 day notice to the family and a copy to the PHA. All rent increases are subject to PHA rent reasonableness standards.

XV. INTERIM RECERTIFICATIONS

A. CHANGES TO REPORT

1. Certificate Program.

In the Certificate Program, the Total Tenant Payment and Tenant Rent will remain in effect for the period between regularly scheduled reexaminations except:

- The tenant may report any of the following changes which would result in a decrease in the tenant's rent:
 - A. Decrease in income; or
 - B. Increase in allowances or deductions.

Decreases in the tenant portion of the rent will be effective the first day of the month following the month in which the change occurs if reported in a timely manner.

The PHA does not conduct interim recertifications which could result in an increase of rent until the family's scheduled annual recertification unless the family:

- Reports zero income at an interim or annual recertification;
- Has an annual income that cannot be projected with any reasonable degree of accuracy;
- Has submitted false, incomplete, or inaccurate information at their last recertification;
- Has been paying an incorrect tenant rent as a result of PHA error. (The family will not be subject to a retroactive charge for overpayments by the PHA).

2. Voucher Program.

The tenant shall be required to report under the same circumstances as the Certificate Program described above.

However, the Total Tenant Payment or Tenant Rent may be changed in addition to the reasons listed above if there is a change in the Rent to Owner which causes a change in Total Tenant Payment or Tenant Rent.

B. FORMS USED FOR INTERIMS

The PHA will only verify those changes that the family reports.

A HAP Amendment Form will be sent to the owner and tenant because the family's Total Tenant Payment has changed.

C. TIMELY REPORTING

1. Standard for Timely Reporting of Changes.

The standard for reporting changes for interims (other than changes in family composition which are described below) in a timely manner is for the family to report the change by the end of the month in which the change occurs.

However, there will be situations where, due to holidays and weekends, the tenant will not be able to report the change by the end of month in which the change occurs. Therefore, if the change occurs during the last 5 calendar days of the month, and the change is reported within the first 5 calendar days of the next month, it will be considered timely reporting.

The staff will note the file when the tenant calls to report to the change. If the tenant calls and the file was noted within the time frames specified, it will be considered timely reporting. This will be followed up with a written confirmation of the interview appointment date.

In this case, any decrease can be made retroactive to the first of the month following the change. The tenant will be given the customary 30 days notice (prior to the first of the month) for an increase.

The tenant will be required to sign a third party verification form, unless third party verification is impossible to obtain. The tenant will also be required to bring any documents in to prove the change. If the tenant does not bring the required information with them to the interview, they will be required to return with the documentation within 10 calendar days. In addition, third party verification is sent out, verifying the change.

If the tenant does not return within the 10 calendar days, the Total Tenant Payment is calculated when either the third party verification or the document is received, and it will be considered "untimely reporting" by the tenant.

If the tenant does not come in within the 10 day grace period identified, the decrease cannot be retroactive to the first of the month.

2. Procedures When the Change is Reported in a Timely Manner.

The Housing Authority will notify the family and the owner of any change in the Housing Assistance Payment to be effective according to the following:

- The family will be given a 30 day notice prior to the first of the month for a rent increase. Increases in the tenant rent are to be made effective upon thirty days notice, prior to the first of the month, so that the change is always effective on the first of the month, rather than some date within the month.
- Decreases in the tenant rent are to be made effective the first of the month following the change. However, no downward rent adjustments are to be processed until all the facts have been verified, even if a retroactive adjustment results.

The change may be based on the documentation the tenant brought with them to the interview, followed up by the third party verification sent to the third party. Verbal confirmation by the tenant will not be acceptable.

If the tenant does not bring the information with them, they will be requested to return with the documentation within 10 calendar days or it will be considered untimely reporting.

3. Procedures when the Change Is Not Reported in a Timely Manner.

If the family does not report the change by the end of the month in which the change occurred, or within the 10 day grace period specified in Section C1, the family will be determined to have caused an unreasonable delay in the interim reexamination processing.

- **Increased Tenant Rent:** The change will be effective retroactive to the date it would have been effective, had it been reported on a timely basis.
- **Decreased Tenant Rent:** The change will be effective on the first of the month following completion of processing by the PHA (not on a retroactive basis.)

Deviation from normal effective dates is justified because of the tenant's failure to supply the required report.

The calculation methodology is the same even if there was a change three or four years ago that the tenant did not report and should have. The change is retroactive to the original date even if they have been changing jobs every six months and have not reported their job income at reexamination, as long as the family's change was made after the family became a participant. A history must be established to determine how much money the tenant owes the PHA.

4. Procedures When the Change Is Not Processed by the PHA in a Timely Manner.

"Processed in a timely manner" means that the change is effective on the date it would have been effective when the tenant reported the change in a timely manner.

If the change cannot be made effective on those dates, using the required notice periods, the change is not processed by the PHA in a timely manner.

If changes are not processed by the PHA staff in a timely manner, an increase will be effective with the required thirty days notice prior to the first of the month after completion of the processing by the PHA.

If the change resulted in a decrease, an overpayment by the tenant will be calculated retroactively to the date it should have been effective and a check will be sent to the tenant.

5. Timing of Next Annual Recertification.

In the event there is an interim adjustment completed, the next regular reexamination will be scheduled within a year from the last scheduled effective date of the annual reexamination of family contribution.

6. Changes in Family Composition.

All changes in family composition must be reported at the family's next annual recertification or when the family gives notice to move the PHA.

If the family has failed to report the change of family composition in a timely manner, any difference in the allowable subsidy due to a reduced Certificate size eligibility based on the Gross Rent for their current sized unit less the FMR for the Certificate size to which they were entitled, using the FMR schedule currently in effect, shall be charged to the remaining family retroactively from the first of the month following the change and a new Certificate of

appropriate size issued immediately, if available, unless the family is in the initial term of the lease.

The following shows how subsidy is calculated if a family fails to report a change in a timely manner from a 3BR Certificate to a 1BR Certificate and the family had been living in a 3BR unit:

$$\begin{aligned} & 3BR \text{ Contract Rent} \\ & + \text{3BR Utility Allowance} \\ & - 1BR \text{ FMR} \\ & = \text{Overpaid subsidy} \end{aligned}$$

Families holding a Housing Voucher will only be penalized if they do not report their change in family composition from one annual recertification to another or if they move to another unit. This is because their Payment Standard does not change until an annual recertification or they move to another unit.

If a family does not report the change at their annual recertification or when requested provide information for an interim recertification, the same kind of overpaid subsidy will be calculated by taking the larger size Payment Standard and subtracting the smaller size Payment Standard to get the overpayment.

For example, if a family had a 3BR Payment Standard and actually qualified for a 1BR Payment Standard at recertification but did not inform the PHA, the calculation would be as follows:

$$\begin{aligned} & 3BR \text{ Payment Standard} \\ - & \text{1BR Payment Standard} \\ = & \text{Overpaid Subsidy} \end{aligned}$$

XVI. TERMINATION AND FAMILY MOVES

A. FAMILY MOVES

The family can decide to move to another unit after the initial 12 months has expired or after obtaining a mutual rescission of the lease from the family's landlord. The PHA will issue the family a new Certificate or Housing Voucher if the family does not owe the PHA money and the family is in compliance with HUD and CMHA Section 8 regulations.

B. FAMILY NOTICE TO MOVE

Families are required to give advanced written notice of their intent to end the lease to their owner in accordance with their lease (not less than 30 days and not greater than 60 days). During the first term, families may not end the lease unless they and the owner mutually agree to end the lease. If the family moves from the unit before the initial term of the lease ends without the owner's and PHA's consent, it will be considered a serious lease violation and may subject the family to termination from the Section 8 Program.

The family must provide a copy of the lease termination notice to the PHA. A family's failure to provide a copy of the lease termination notice to the PHA shall be considered as a violation of Family Obligations and may cause the family to be terminated from the Section 8 Program.

Acceptable lease termination notice to the owner must be done by certified mail. The family will be required to provide the certified mail receipt and a copy of the lease termination notice to the PHA. If the owner does not accept the certified mail receipt, the family will be required to provide the receipt and envelope showing that the attempt was made. A copy of the lease termination notice shall also be given to the PHA.

Failure to follow the above procedures may subject the family to termination from the Section 8 Program.

C. CERTIFICATE/VOUCHER ISSUANCE DETERMINATION FOR SPLIT HOUSEHOLDS

When the household is divided and becomes more than one household (e.g. divorce or legal separation), the PHA must determine who is eligible to participate in the program.

Unless there is mutual consent or a Court stipulated determination, the PHA will make the decision as to which party is able to retain the Certificate or Voucher.

In making this decision, the PHA may consider the following guidelines:

- The desires of the parties involved;
- Custody of the children;
- The individual to whom the Certificate/Voucher was issued, if not jointly;
- The remaining family composition in the unit;
- The possibility of domestic violence.

Documentation to prove these items will be the responsibility of the requesting parties. If documentation is not provided, the PHA reserves the right to issue the Certificate or Voucher to the remaining member of the tenant family.

D. EVICTIONS

In the event the owner desires to terminate the lease, the owner must comply with the conditions of the lease and housing contract. The lease may be terminated by:

- court action pursuant to the Ohio Revised Code using the grounds for eviction cited in the lease;
- a mutual lease rescission executed by the owner and tenant (The form must be approved by the PHA).

Other actions may result in lease termination:

- The owner may terminate a lease at any time after the initial one year period or at the end of any renewal period;
- The owner may choose not to make the repairs to the unit as required by the Housing Quality Standards;
- The unit becomes over-crowded or under-occupied according to Housing Quality Standards and PHA Subsidy Standards.

In the event of a lease termination or the owner obtains an eviction or lease rescission, the family may be issued another Certificate or Voucher to move to another unit unless there are grounds to deny or terminate assistance. Prior to any issuance of a new Certificate or Voucher, the PHA will conduct a recertification pursuant to the PHA's policies.

E. OWNER NOTICE TO VACATE UNIT

Owners may only give tenants notice according to their lease and/or the HUD Lease Addendum provisions. Owners are required to follow eviction procedures consistent with

their housing contract and must comply with federal, State, and local law.

F. FAMILY MISREPRESENTATION

If the family has committed fraud in connection with the Section 8 Program, the PHA may terminate assistance and cancel the contract. If the family has understated income and assets, overstated deductions, and/or has misrepresented family composition, the PHA will make every effort to recover any housing subsidy overpayment made as a result of the family's fraud or program abuse.

G. OWNER MISREPRESENTATION

If an owner has committed fraud or misrepresentation in connection with the Section 8 Program, the PHA may terminate the Contract and review the circumstances and family's involvement to determine if the family is eligible to relocate to another unit with continuation of assistance.

The PHA will make every effort to recover any overpayment made as a result of owner fraud or abuse.

If the owner has committed fraud, the PHA may bar the owner from participation in the program or refuse to enter into any new housing contract. The period of time will be determined by the PHA, depending on the seriousness of the offense.

H. CHANGE IN OWNERSHIP

The PHA must receive a written request by the owner who executed the HAP in order to make changes regarding who is to receive the PHA's rent payment or the address to where the payment should be sent.

The PHA will process a change of ownership only upon the written request of the new owner and only if accompanied by a copy of a Deed or Trust showing the transfer of title and the correct Tax

Identification Number or Social Security Number of the actual owner of the Property. New owners to the Program must properly execute IRS form W-9. The PHA may withhold payment until the correct tax identification number is received. The PHA will request the owner to execute a HAP Contract Transfer Form. A new owner may request a new lease and HAP Contract be executed with the tenant and PHA.

XVII. DENIAL OR TERMINATION OF ASSISTANCE

A. GENERAL POLICY

The PHA may deny or terminate assistance at any time for any of the following reasons:

- Families who have committed fraud or program abuse in any federal housing assistance program as documented by the PHA;
- Families who have violated any of their Family Obligations which include:
 - a. The family must supply any information that the PHA of HUD determines necessary for the administration of the program, including any evidence of citizenship or eligible immigration status.
 - b. The family must supply any information requested by the PHA or HUD for use in regular or interim reexamination of the family's income and family composition in accordance with HUD requirements.
 - c. The family must disclose and verify social security numbers and must sign and submit consent forms for obtaining information in accordance with 24 CFR part 760 and 24 CFR part 813.
 - d. Any information supplied by the family must be true and complete.
 - e. The family is responsible for any HQS breach caused by the family as described in 982.404(b).
 - f. The family must allow the PHA to inspect the unit at reasonable times and after reasonable notice.
 - g. The family must not commit any serious or repeated violation(s) of the lease.
 - h. The family must notify the PHA and owner before the family moves out of the unit, or terminates the lease on notice to the owner. See 982.314(d).
 - i. The family must promptly give the PHA a copy of any owner eviction notice.
 - j. The family must use the assisted unit for residence by the family. The unit must be the family's only residence.
 - k. The composition of the assisted family in the unit must be approved by the PHA. The family must promptly inform the PHA of the birth, adoption, or court-awarded custody of a child. The family must request the PHA's approval to add any other family member as an occupant of the unit.
 - l. The family must promptly notify the PHA if any family member no longer resides in the unit.

- m. If the PHA has given approval, a foster child or a live-in-aide may reside in the unit.
- n. Members of the household may engage in legal profit-making activities in the unit, but only if such activities are incidental to the primary use of the for residence by members of the family.
- o. The family must not sublease or let the unit.
- p. The family must not assign the lease or transfer the unit.
- q. The family must supply any information or certification requested by the PHA to verify that the family is living in the unit, or relating to family absence from the unit, including any PHA requested information or certification on the purposes of family absences. The family must cooperate with the PHA for this purpose. The family must notify the PHA of absence from the unit.
- r. The family must not own or have any interest in the unit.
- s. The family's members must not commit fraud, bribery, or any corrupt or criminal act in connection with the Section 8 Program.
- t. The family's members may not engage in drug-related criminal activity, or violent criminal activity (see _982.553).
- u. An assisted family, or members of the assisted family, may not receive Section 8 tenant-based assistance while receiving another housing subsidy, for the same unit or for a different unit, under any duplicative (as determined by HUD or in accordance with HUD requirements) federal, State or local housing assistance program.

In addition to the above requirements, the PHA may terminate assistance if:

- a. families who refuse to enter into a repayment agreement for funds due the PHA or who are in default of an executed repayment agreement by missing two consecutive payments. For any family in default, the outstanding balance must be paid prior to the issuance of a Certificate or Voucher or execution of a HAP Contract;
- b. families whose Total Tenant Payment is sufficient to pay the full gross rent and/or six months has elapsed since the PHA's last HAP payment was made to the family's landlord;
- c. any family member has been evicted from public housing;
- d. a PHA has ever terminated assistance under the Certificate or Voucher Program for any family member;
- e. the family currently owes rent or other amounts to a housing authority in connection with Section 8 or public housing assistance under the 1937 Act;
- f. the family has not reimbursed any housing authority for amounts paid

- to an owner under a HAP contract for rent damages to the unit, or other amounts owed by the family under the lease;
- g. failure as FSS program participant to comply without good cause with the FSS contract of participation.
- h. the family has engaged in abusive or violent behavior toward the PHA's personnel.

B. DEFINITIONS AND RELATED POLICIES

Drug-related or Violent Criminal Activity:

Family must not engage in drug-related criminal activity or violent criminal activity, including criminal activity by any Family member.

Drug-related criminal activity means:

- a. The illegal manufacture, sale or distribution, or the possession with intent to manufacture, sell or distribute, a controlled substance (as defined in the Controlled Substance Act);
- b. The illegal use or possession (other than with intent to manufacture, sell or distribute), of a controlled substance, except that such felonious use or possession must have occurred within one year before the date that the PHA provides notice to an applicant or participant of the PHA's determination to deny admission or terminate assistance.
- c. Drug related criminal activity does not include the use or possession, if the Family member can demonstrate that s/he:
- d. has an addiction to a controlled substance, has a record of such an impairment, or is regarded as having such an impairment; and,
- e. has recovered or is recovering from such addiction and does not currently use or possess controlled substances.

Violent criminal activity includes any felonious criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force against the person or property of another.

Evidence of Criminal Activity:

In determining whether to deny or terminate assistance based on drug- related criminal activity or violent criminal activity, the PHA may deny or terminate assistance when information from a reliable source clearly indicates that a family member has engaged in

such activity regardless of whether the family member has been arrested or convicted.

As a measure to determine whether the person has violated this family obligation, one of the following situations must be present:

- b. there has been an arrest for engaging in drug-related criminal activity or violent criminal activity (as defined above), including criminal activity by any Family member, which resulted in a conviction within the last 60 months;
- c. the family has been evicted from subsidized housing (including but not limited to Public Housing and housing subsidized under the Section 8 Certificate, Voucher or Moderate Rehabilitation programs) for engaging in drug-related criminal activity or violent criminal activity (as defined above), including criminal activity by any Family member;
- d. The PHA has acquired/been presented with information that the family, including any family member, is engaging in drug-related criminal activity or violent criminal activity (as defined above).

C. \$0 ASSISTANCE TENANTS

\$0 assistance tenants may remain on the program for 6 months from the effective date they went to \$0 assistance.

If the family's Total Tenant Payment is sufficient to pay the full gross rent and 6 months has elapsed since the PHA's last HAP payment was made, the family's assistance is terminated.

There are no expiration dates on leases. There is no new lease and contract at reexamination time unless the owner offers the tenant a new lease.

However, if the owner requests a rent increase during this period and the rent increase would cause the PHA to resume HAP payments, or if at reexamination time, the tenant had a loss of income and there would be a HAP payment, the payments would be resumed.

If payments are resumed, there would be an interim adjustment and an Amendment would be sent out, listing the new amounts.

When the 6 months has elapsed, the owner will be notified of the termination of the HAP Contract, in accordance with the HAP Contract.

The tenant will be notified of their rights to remain on the program at \$0 assistance for 6 months.

In the event that the tenant wants to move to another unit during this period, the PHA would not execute a new HAP Contract for the new unit at \$0 assistance. If there would be assistance (because of a higher rent, for example), the PHA may execute a new HAP Contract.

D. NOTICE OF TERMINATION

For any reason where the PHA decides to terminate assistance to the family, the PHA must give notice to the family and the owner. A 30 day written termination notice which will include the following information:

- e. the reasons for the termination;
- f. the effective date of the termination;
- g. the household's right to request an informal hearing;
- h. the family's responsibility to pay the full rent to the owner if they remain in the unit

XVIII. MOVE-OUT INSPECTIONS

Move-out inspections are done after the tenant vacates the unit and should not be done while the tenant is still cleaning the unit.

The owner or the owner's representative will be required to attend the move-out inspection. The owner will be notified as to when the inspection will take place. The PHA will notify the tenant of the inspection date.

The PHA will conduct a move-out inspection to substantiate the damage claim upon the owner's request. The owner will not be allowed to file a damage claim unless move-out inspection is requested and completed prior to work being done.

The PHA will analyze the claim to see whether the costs are reasonable, based on cost guidelines, receipts, and the judgement of the staff person responsible for making the determination.

The owner must request a move-out inspection within 5 days after the tenant has vacated the unit in order to submit a claim. In the event that the PHA cannot schedule a timely inspection of the unit, the PHA's Inspections Coordinator may give the owner permission to submit the claim with pictures of the unit, to substantiate the damage claim.

If the tenant elects to remain in the unit at the end of HAP contract and Lease, the PHA will not be obligated to pay unpaid rent and damages if the tenant does not vacate the unit within 60 days of the termination date of the HAP contract.

The above policies do not apply to contracts executed under the new rules that were made effective on October 2, 1995. The PHA will continue to process damage claims for contracts that have been executed under the previous HUD regulations.

XIX. OWNER CLAIMS

As part of the HAP Contract, owners can make "special claims" for damages, unpaid rent, and vacancy loss (vacancy loss cannot be claimed in the Voucher Program) after the tenant has vacated the unit.

Owner claims for payment for unpaid rent, damages or vacancy loss under the Section 8 Existing Program are reviewed for accuracy and completeness and compared with internal records on the unit such as initial inspection report and on-site move-out inspection (or pictures if a move-out inspection cannot be scheduled before the next tenant moves in, with PHA permission.)

Although the PHA will make payments on behalf of the tenant, the tenant is ultimately responsible for any damages, unpaid rent, or vacancy loss paid by the PHA to the owner and will be required to repay the PHA to remain eligible for the Section 8 Program.

HAP Contracts executed under new HUD regulations do not authorized PHA payments for unpaid rent or damages at the end of the lease.

A. UNPAID RENT

Unpaid rent is the tenant's portion of rent due and payable while the tenant is under the lease. It does not include any rent beyond the termination period of the HAP Contract.

Because the owner has other remedies under the lease and contract to remedy the uncollected rent, the PHA will pay unpaid rent claims for no more than two months' back rent prior to the vacate date or termination of HAP Contract.

B. DAMAGES

Claims for damages must be supported by the actual bills for repairs and materials and labor and a copy of the canceled checks showing payment if the repair has been made. Estimates for repairs or replacement of items are acceptable if repairs have not been made. Bills from individuals providing labor must include their name, address and phone number.

Eligible items to be included on the damage claim must have been a tenant obligation under the lease and must have been clearly identified as a tenant obligation under the lease. Separate agreements are not considered to be included as a tenant obligation under the lease.

The PHA will develop a list of reasonable costs and charges for items routinely included on damage claims. This list will be used as a guide in determining the reasonableness of damage claims.

C. VACANCY LOSS - (CERTIFICATE PROGRAM ONLY)

In order for the owner to claim vacancy loss, the tenant must have moved in violation of the lease.

To claim vacancy loss, the landlord must meet the minimum requirements of having notified the PHA of the vacancy and must have advertised the vacancy by placing an ad in the local newspaper offering the unit "For Lease" and specifying "Section 8 Families Welcome." A copy of the advertisement and the dates advertised at the time of submission of damage/vacancy loss claim will be submitted to the PHA. Posting the vacancy with the PHA may be accepted in lieu of the advertisement. Vacancy Loss is applicable to Certificate Program only.

No eligible tenant may have been denied housing except for good cause in order for an owner to claim vacancy loss.

D. PROCESSING CLAIMS

When the PHA receives a claim for unpaid rent, damages, or vacancy loss, it will be reviewed by the PHA. The tenant should be notified by the owner of the move-out inspection so that they may provide input as to their responsibility for damages.

If the owner does not notify the tenant of the move-out inspection date, the tenant should contact the PHA upon move-out to determine the date. Nevertheless, the tenant will be responsible to the PHA for claims paid on their behalf when it comes to future assistance.

Failure on the part of the tenant to attend the inspection will necessitate the PHA making the decision based on the evidence submitted and the inspection reports.

Any amount owed by the tenant to the owner for unpaid rent or damages will first be deducted from the security deposit which an owner could have collected under the program rules. The balance will be calculated using HUD methodology.

Proof or verification that the owner has attempted to collect any monies owed directly from the tenant must be submitted with the damage/vacancy loss claims. Landlords must mail the request for payment by Certified Mail/Return Receipt Requested to tenant's last known

address with a request for the Post Office to "Please Forward."

Costs of filing eviction and forcible detainer to remove tenant from premises when they have violated their lease shall not be considered a "damage" to said unit and must not be included in the listing of the damages for reimbursement.

All unpaid rent, damage, and vacancy loss claims must be submitted within 90 days of the date the tenant vacated the unit. If the owner has filed a claim for judgement for damages and unpaid rent, the PHA will place a hold on the claim until the owner provides a copy of the court's decision to the PHA. The PHA may affirm or modify the court award, if any, depending upon the information about the claim on file with the PHA.

If the Security Deposit is insufficient to reimburse the owner for the unpaid tenant rent or other amounts which the family owes under the lease, the owner may request reimbursement from the PHA up to the limits for the Certificate or Voucher program.

Once the payment is made to the owner, the PHA will inform the family of the payment and of the family's responsibility to reimburse the PHA for payment made on their behalf.

The family will be informed of the possible effect on transfer rights and future program participation if payment is not made within the time specified by the PHA.

The PHA may enter into a Repayment Agreement with the participant for repayment of the amount owed, rather than request total payment, depending on the family's past history of Repayment Agreements with the PHA.

XX. COMPLAINTS AND APPEALS BY PARTICIPANTS AND OWNERS

A. COMPLAINTS

The PHA will investigate and respond promptly to complaints by families or owners. The PHA may require that complaints other than HQS violations be put in writing to the PHA. Each complaint regarding physical condition of the units may be reported by phone to the Inspection section. Anonymous complaints are checked whenever possible.

B. APPEALS BY OWNERS

Owners may appeal the PHA's decision by first attempting to meet with the Section 8 Coordinator who made the initial decision. If the owner is not satisfied with the Coordinator's decision, the owner may schedule a meeting with the Director and Assistant Director of Section 8 Programs to resolve the matter. If the owner remains unsatisfied with the Director's or Assistant Director's decision, the owner may file a written request for a final review of the PHA's decision by the Executive Director.

C. APPEALS BY PARTICIPANTS

All Section 8 participants have a right to appeal the PHA's decision(s) which may affect their status as a participant and the type and scope of benefits that are afforded to them under the Section 8 Program. Appeals to certain PHA decisions must be made pursuant to the HUD regulations and the PHA's policies that govern informal hearings. An informal hearing allows a participant an opportunity to present the participant's individual circumstances or personal hardship which could reverse or modify the PHA's initial decision. The informal hearing also affords the hearing officer an opportunity to review the PHA's initial or proposed decision(s) for compliance with HUD regulations and PHA policies. The hearing officer may reverse, modify, or affirm with or without conditions, the PHA's initial or proposed decision as long as the hearing officer's decision is not contrary to HUD regulations or requirements, or otherwise contrary to federal, state, or local law.

The PHA will not be required to provide an informal hearing to a participant family for any of the following:

- i. discretionary administrative determinations;
- j. general policy issues or class grievances;
- k. establishing or reviewing the PHA's utility allowances;
- l. extending or suspending a term of a Certificate/Voucher;
- m. approving a unit or owner's lease;

- n. HQS determinations on a unit;
- o. HQS occupancy violations because of family size;
- p. the PHA's contractual rights and remedies with an owner.

All requests for Informal Hearings must be made within 10 calendar days of the date of the notification letter or within 10 calendar days from the PHA's initial administrative action or decision. All requests must be made in writing and must be addressed to the PHA's Director of Section 8 Programs. Requests received after the deadline will not be processed. The PHA accepts no responsibility for lost or delayed mail.

If the participant's request for an Informal Hearing is received by the PHA's deadline, an Informal Hearing will be scheduled and the participant will be sent written confirmation (at the participant's last known address) of the informal hearing's location, time, and date.

If the participant's request for an Informal Hearing is received after the PHA's deadline, the PHA will reject the participant's request for the hearing by sending a rejection letter to the participant. The letter will be sent to the participant's last known address.

The participant must bear the burden of proof for any claim of lost or undelivered mail. The PHA will maintain all copies of correspondence in the participant's file.

The Informal Hearing shall be conducted by a Hearing Officer who will be neither the person who made or approved the decision under review or a subordinate of such person. Hearing Officers may be PHA employees appointed by the PHA's Executive Director.

The Hearing Officer shall regulate the conduct of the hearing in accordance with the PHA's hearing procedures. The hearing shall be conducted informally by the Hearing Officer. Oral or documentary evidence pertinent to the facts and issues raised by the parties may be received without regard to admissibility under the rules of evidence applicable to judicial hearings. The Hearing Officer shall require the PHA, the participant, counsel, and all other participants and spectators to conduct themselves in an orderly fashion. Failure to comply with the directions of the Hearing Officer to obtain order may result in the exclusion from the proceedings or in a decision adverse to the interests of the disorderly party and granting relief or denial of the relief sought.

The PHA will provide reasonable accommodation for a person with disabilities in order to participate in the hearing. The PHA reserves the right to decide the type and scope of accommodation.

The informal hearing may be recorded and/or transcribed at the sole expense of the party who has arranged for the service.

At the hearing, the participant must first make a showing of an entitlement to the relief sought. Thereafter, the PHA must sustain the burden of justifying the PHA's action or failure to act against which the complaint is directed.

The participant shall be afforded a fair "due process" hearing which shall include:

- q. the right to be represented by counsel or other representative;
- r. the opportunity for the participant to examine before the Informal Hearing any PHA documents that are directly relevant to the hearing. The participant may be allowed to copy any such document at their own expense. If the PHA does not allow access to a particular document, the PHA may not rely on the document at the hearing;
- s. the right to a private hearing unless the participant requests a public hearing;
- t. the right to present evidence and arguments in support of the participant's complaint to controvert evidence relied upon by the PHA and to confront and cross-examine all witnesses upon whose testimony or information the PHA relies upon to support its decision;
- u. a decision based solely and exclusively upon the facts presented at the hearing.

The participant will also be advised that the PHA must be given the same opportunity to examine before the informal hearing any participant documents that are relevant to the hearing. The participant must allow the PHA the opportunity to copy any document at the PHA's expense. If the participant fails or refuses to allow the PHA to examine the requested documents, the participant may not rely upon the document(s) at the hearing.

If the participant or the PHA fails to show at the scheduled hearing, the Hearing Officer may make a decision to postpone the hearing for five business days (excluding holidays and weekends) or make a determination that the party has waived their right to a hearing.

The participant and the PHA shall be notified of the Hearing Officer's determination; provided that a determination shall not constitute a waiver of any right the participant may have to contest the PHA's disposition of the Informal Hearing in a court of law.

D. DECISION OF THE HEARING OFFICER

The Hearing Officer shall prepare and issue a written statement on the participant's appeal within 15 calendar days after the hearing. The decision must briefly state the reasons for the decision and must be based upon the preponderance of evidence presented at the hearing. A copy of the hearing decision will promptly furnished to the participant.

The PHA is not bound by the Hearing Officer's decision when:

- v. the PHA is not required to provide an opportunity for an informal hearing, or exceeds the authority of the person conducting the hearing under the PHA's informal hearing procedures;
- w. it is contrary to HUD regulations or requirements, or otherwise contrary to federal, state, or local law.

If the PHA determines that it is not bound by an informal hearing decision, the PHA will promptly notify the participant of the determination and of the reasons for the determination.

Nothing in this section shall constitute a waiver of, nor affect in any way, the rights of the participant to a trial or judicial review in any court proceedings which may be brought in the matter at a later time.

XXI. MISSED APPOINTMENTS FOR PARTICIPANTS

A. GENERAL POLICIES

A family who fails to keep appointments at the PHA's offices or at the tenant's unit within the time frame specified in this Plan, without notifying the PHA in advance, may be sent a notice of termination of assistance. Grounds for termination shall be the family's refusal or inability to supply such certification, release, information or documentation, as the PHA or HUD determines to be necessary in the following situations:

- x. Visiting PHA's offices to provide verification information;
- y. Certificate or Voucher Briefing;
- z. Lease signing and Briefing;
- aa. Housing Quality Inspections;
- bb. Annual Recertification Activities;
- cc. Interim Reporting Requirements;
- dd. Quality-Control Appointments/Inspections;
- ee. Fraud or Program Abuse Investigations.

B. APPOINTMENT AT THE PHA's OFFICE

The PHA sends advance written notice to the family to meet with PHA Section 8 staff to initiate annual or interim recertification procedures. If the tenant fails to show for the first appointment, a second appointment is scheduled with written notice of the second appointment mailed to the family. If the family fails to show for the second appointment, the PHA shall send a proposed notice of termination of housing assistance to the family. The proposed termination shall provide the family an opportunity for an informal hearing before final PHA action.

If a family notifies the PHA that they are unable to keep either the first or the second review appointment, a third appointment may be scheduled at the discretion of the PHA if the PHA determines that the family had a valid excuse for missing the appointment(s). No more than three appointments may be granted to initiate activities listed in the General Policies of this Section.

C. NEED-MORE APPOINTMENTS OR DOCUMENTS

At the family's initial appointment, the PHA may require the family to provide additional documents or certification in order to complete the recertification process. The PHA will schedule a "need-more" appointment with the family to enable the family to give the

requested items directly to the Section 8 caseworker. This procedure enables the caseworker to complete the recertification interview process. The caseworker may also request that the family return or mail the additional needed items to the PHA's offices in order to conclude the recertification process.

The deadline for receiving required documents will be given to the family. Any additional items needed by the PHA will be requested in writing and noted in the tenant's file.

The PHA will give a family no more than two opportunities to provide the required additional information in order to complete the recertification process. The Family's refusal or inability to provide the requested information within specified time frames shall be grounds for termination of housing assistance. Prior to any final action by the PHA, the family will be offered an opportunity for an informal hearing.

D. INSPECTIONS

See Section XI(I) of this Administrative Plan.

XXII REPAYMENT AGREEMENTS

Repayment Agreements are executed with families who must reimburse the PHA for overpaid HAP subsidy due to unreported income and assets, late reporting of income changes, incorrect or incomplete information about family composition, or when the PHA makes a damage and/or vacancy loss payment to the family's previous landlord.

No family may have more than one repayment agreement in effect at any time for funds due the PHA, nor will there be any consolidation of any debts owed to the PHA. Each occurrence must be treated separately.

If the PHA enters into a Repayment Agreement with the family, the terms of the Repayment Agreement will be as follows:

AMOUNT DUE	INITIAL PAYMENT*	MAX TERM
\$500 or less	50% due	6 months
\$501 - 1000	40% due	12 months
\$1001 - 2,500	33% due	18 months
\$2,501 or more	20% due	24 months

* Due at the execution of the Repayment Agreement

Whether a family will be allowed to enter into a Repayment Agreement with the PHA will be at the sole discretion of the PHA. If the PHA has determined that the family committed willful and intentional fraud, the PHA may require the family to repay the entire amount in full as a condition to continue to receive Section 8 assistance. The PHA may terminate assistance if the family refuses to enter into a Repayment Agreement.

Families who are in default of an executed Repayment Agreement by missing two consecutive payments or who are currently behind by two payments must pay their outstanding balance upon notice by the PHA. The PHA may terminate assistance if the family breaches the Repayment Agreement.

Prior to any final termination, the PHA will offer the family an opportunity to request an informal hearing.

XXIII. MONITORING PROGRAM PERFORMANCE

Monthly reports are maintained and monitored for reviewing the waiting list, the outstanding Certificates and Vouchers, and the HAP Register to assure achievement of the outreach goal and the leasing schedule.

Special reports to monitor processing and performance indicators are created and distributed to the managers and staff.

Quality control file audits are conducted by managers on ten percent of the units under contract.

Quality control inspection audits are conducted by managers on five percent of the units under contract.

Additional audits are performed to check performance indicators.

XXIV. PAYMENT STANDARDS FOR THE VOUCHER PROGRAM

A. PAYMENT STANDARDS

The Payment Standard for the Voucher Program will never be less than 90 percent or more than 120 percent of the current Fair Market Rent for units located in Franklin County.

Higher Payment Standards may be adopted for units located suburban communities within the Fair Market Rent area if approved by HUD and the PHA's Board of Commissioners.

B. AFFORDABILITY ADJUSTMENTS

The PHA will review the Payment Standard annually to determine whether an affordability adjustment should be made. Any adjustments will be made in accordance with HUD regulations.

XXV. CHARGES AGAINST THE SECTION 8 ADMINISTRATIVE FEE RESERVE

Periodically, it is necessary for the PHA to make charges against the Section 8 Administrative Fee Reserve to meet unseen or extraordinary expenditures for maintenance, equipment, or services for housing programs that are administered by the PHA.

The PHA's Board of Commissioners have authorized the PHA's Executive Director to charge up to \$25,000 against the Section 8 Administrative Fee Reserve for any single item designated for maintenance, equipment, or services for any PHA administered housing program.

Any single item exceeding \$25,000 will require prior Board of Commissioner approval before any charge is made against the Section 8 Administrative Fee Reserve.

GLOSSARY OF TERMS IN SUBSIDIZED HOUSING

ADJUSTED INCOME. Annual income, less allowable HUD deductions.

ANNUAL CONTRIBUTIONS CONTRACT (ACC). A written agreement between HUD and a PHA to provide annual contributions to cover housing assistance payments and other expenses pursuant to the Act. If there is a State Agency administering the Section 8 Program, for example, there is usually an ACC between the State Agency and HUD.

ANNUAL INCOME. The anticipated total annual income of an eligible family from all sources for the 12-month period following the date of determination of income, computed in accordance with the regulations.

ANNUAL INCOME AFTER ALLOWANCES. The Annual Income (described above) less the HUD-approved allowances.

ASSETS. (See Net Family Assets.)

ASSISTED TENANT. A tenant who pays less than the market rent as defined in the regulations. Includes tenants receiving rent supplement, Rental Assistance Payments, or Section 8 assistance and all other 236 and BMIR tenants, except those paying the 236 market rent or 120% of the BMIR rent, respectively.

CERTIFICATE OF FAMILY PARTICIPATION. A Certificate issued by the PHA under the Section 8 Existing Program, declaring a family to be eligible for participation in this program and stating the terms and conditions for such participation.

CHILD CARE EXPENSES. Amounts paid by the family for the care of minors under 13 years of age where such care is necessary to enable a family member to be employed or for an adult to further their education.

CONTRACT. (See Housing Assistance Payments Contract.)

CONTRACT RENT. In the Section 8 Certificate Program, Contract Rent is the total rent paid to the owner, including the tenant payment and the HAP payment from the PHA.

DEPENDENT. A member of the family household (excluding foster children) other than the family head or spouse, who is under 18 years of age or is a Disabled Person or Handicapped Person, or is a full-time student 18 years of age or over.

DISABLED PERSON. "Disabled person" means a person who is under a disability as defined in Section 223 of the Social Security Act (42 U.S.C. 423) or in Section 42 U.S.C. 6001(7).

DISPLACED PERSON. "Displaced person" means a person displaced by governmental action or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal Disaster Relief laws.

ELDERLY HOUSEHOLD. A family whose head or spouse or whose sole member is at least 62 years of age or a disabled person as defined in this section or a handicapped person as defined in this section or may include 2 or more elderly, disabled or handicapped persons living together or 1 or more such persons living with another person who is determined to be essential to his or her care and well being.

ELDERLY PERSON. One who is at least 62 years old.

ELIGIBILITY INCOME. May 10, 1984, regulations deleted Eligibility Income, per se, because Annual Income is now for eligibility determination to compare to income limits.

ELIGIBLE FAMILY (Family). A family is defined by the PHA in the administrative Plan, which is approved by HUD.

EXCESS MEDICAL EXPENSES. Any medical expenses incurred by elderly families only in excess of 3% of Annual Income which are not reimbursable from any other source.

FAIR MARKET RENT. The rent limit published in the Federal Register for Section 8 Existing which includes utilities (except telephone) and ranges and refrigerators. It is used as a standard to obtain privately owned, existing, decent, safe and sanitary rental housing of modest (non-luxury) nature with suitable amenities. Separate FMRs are established for dwelling units of varying sizes (number of bedrooms) and types. It is used as a maximum for Gross Rent in the Certificate Program (without an exception rent.) In the Voucher Program, it is used as a cap for the Payment Standard, used in the ACC calculation of subsidy dollars, and is used to calculate the administrative fee.

FAMILY. The applicant must qualify as a Family. A Family consists of:

2. Two or more persons related by blood, marriage or operation of law or who will live regularly together in the same dwelling unit, and whose income and resources are available to meet the family's needs or a single who qualifies

under the HUD regulations. An expectant mother with no other children will qualify for assistance as a family. She will be listed on the waiting list and qualifies for admission into housing unless she aborts or miscarries prior to admission. Once she is admitted as a single pregnant woman, she will be considered the remaining member of the tenant family if she aborts or miscarries.

3. An elderly household whose head or spouse meets the following definition (unless otherwise approved by HUD, such as for Rental Rehabilitation Program.) The head, spouse, or co-tenant must be:
 - 62 years of age, or;
 - Handicapped with a physical impairment which is expected to be of long continued and indefinite duration, which substantially impedes but does not prohibit his ability to live independently, and is of such nature that such ability could be improved by more suitable housing conditions, or;
 - Disabled within the meaning of Section 223 of the Social Security Act or Section 102 (7) or 6001(7) of the Developmentally Disabled Act, or;
 - Displaced by governmental action or a person whose dwelling has been extensively damaged or destroyed as a result of a declared disaster or otherwise formally recognized under federal disaster relief laws. Governmental action is defined as Federal, State, or local government, or;
 - Remaining member of a tenant family.

FAMILY OF VETERAN OR SERVICEPERSON. A family is a "family of a veteran or servicemember" when:

1. The veteran or servicemember (a) is either the head of household or is related to the head of the household; or (b) is deceased and was related to the head of the household, and was a family member at the time of death.
2. The veteran or servicemember, unless deceased, is living with the family or is only temporarily absent unless s/he was (a) formerly the head of the household and is permanently absent because of hospitalization, separation, or desertion, or is divorced; provided, the family contains one or more persons for whose support s/he is legally responsible and the spouse has not remarried; or (b) not the head of the household but is permanently hospitalized; provided, that he was a family member at the time of hospitalization and there remain in the family at least two related persons.

FOSTER CHILD CARE PAYMENT. Payment to eligible households by state, local, or private agencies appointed by the State, to administer payments for the care of foster children.

FULL-TIME STUDENT. A person who is carrying a subject load that is considered full time for day students under the standards and practices of the educational institution attended. An educational institution includes a vocational school with a diploma or certificate program, as well as an institution offering a college degree.

GROSS FAMILY CONTRIBUTION. Changed to Total Tenant Payment.

GROSS RENT. The sum of the contract rent and the utility allowance. If there is no utility allowance, contract rent equals gross rent.

HANDICAP ASSISTANCE. Anticipated costs for care attendants and auxiliary apparatus for handicapped or disabled family members which enable a family member (including the handicapped family member) to work.

HANDICAPPED PERSON. A person having a physical or mental impairment which:

1. is expected to be of long-continued and indefinite duration;
2. substantially impedes his or her ability to live independently; and
3. is of such a nature that such ability could be improved by more suitable housing conditions.

HEAD OF HOUSEHOLD. The head of household is the person who assumes legal responsibility for the household and is listed on the application as head.

HOUSING ASSISTANCE PAYMENT. The payment made by the PHA to the owner of a unit under lease by an eligible family, as provided in the HAP Contract. The payment is the difference between the Contract Rent (Rent to Owner in the Voucher Program) and Tenant Rent.

HUD. The Department of Housing and Urban Development or its designee.

IMPUTED ASSET. Asset disposed of for less than fair market value during two years preceding examination or reexamination.

IMPUTED INCOME. HUD passbook rate x total cash value of assets. Calculation when assets exceed \$5,000.

INCOME. Income from all sources of each member of the household as determined in accordance with criteria established by HUD.

INCOME FOR ELIGIBILITY. Annual income.

LANDLORD. This term means either the owner of the property or his or her representative or the managing agent or his representative, as shall be designated by the owner.

LEASE. A written agreement between an owner and an eligible family for the leasing of a housing unit.

LOWER INCOME FAMILY. A family whose income does not exceed 80% of the median income for the area as determined by HUD with adjustments for smaller or larger families, except that HUD may establish income limits higher or lower than 80% on the basis of its findings that such variations are necessary because of the prevailing levels of construction costs or unusually high or low incomes.

MARKET RENT. The rent HUD authorizes the owner in multi-family housing to collect from families ineligible for assistance. For Rent Supplement, Section 202 and Section 8 units, the market rent is the same as the Contract Rent. For BMIR units, market rent varies by whether the project is a rental or cooperative.

MEDICAL EXPENSES. Those total medical expenses, including medical insurance premiums, that are anticipated during the period for which Annual Income is computed, and that are not covered by insurance. A deduction for Elderly Households only.

MINOR. A member of the family household (excluding foster children) other than the family head or spouse who is under 18 years of age.

MONTHLY ADJUSTED INCOME. 1/12 of the Annual Income after Allowances or Adjusted Income.

MONTHLY INCOME. 1/12 of the Annual Income.

NEGATIVE RENT. Now called Utility Reimbursement.

NET FAMILY ASSETS. Value of equity in savings, checking, IRA and Keogh accounts, real property, stocks, bonds, and other forms of capital investment. The value of necessary items of personal property such as furniture and automobiles is excluded from the

definition. In cases where a trust fund has been established and the trust is not revokable by, or under the control of, any member of the family or household, the value of the trust fund will not be considered an asset so long as the fund continues to be help in trust.

PAYMENT STANDARD. The amount used to calculate the housing assistance a family will receive in the PHA's Housing Voucher Program.

OWNER. Any persons or entity having the legal right to lease housing.

PARTICIPANT. A family becomes a participant in the PHA's Section 8 Existing Program when there is an effective HAP Contract between the PHA and the owner on behalf of the family.

PUBLIC HOUSING AGENCY (PHA). Any state, county, municipality, or other governmental entity or public body (or agency or instrumentality thereof) which is authorized to engage in or assist in the development of operation of housing for low-income families.

RECERTIFICATION. Sometimes called reexamination. The process of securing documentation to determine the rent the tenant will pay for the next 12 months if there are no additional changes to be reported. There are annual and interim recertifications.

REMAINING MEMBER OF TENANT FAMILY. Person left in assisted housing who may or may not normally qualify for assistance on own circumstances (i.e., widow age 47, not disabled or handicapped).

RENT TO OWNER. This is called Contract Rent in the Certificate Program and Rent to Owner in the Voucher Program. It is the total amount of rent payable to the owner by the family and the PHA per month for an assisted unit.

RESIDENT ASSISTANT. A person who lives in an Independent Group Residence and provides on a daily basis some or all of the necessary services to elderly, handicapped, and disabled individuals receiving Section 8 housing assistance and who is essential to these individuals' care or well being. A Resident Assistant shall not be related by blood, marriage or operation of law to individuals receiving Section 8 assistance nor contribute to a portion of his or her income or resources towards the expenses of these individuals.

SECURITY DEPOSIT. A dollar amount (maximum set according to the regulations) which can be used for unpaid rent or damages to the owner upon termination of the lease.

SERVICEPERSON. A person in the active military or naval service (including the active

reserve) of the United States.

SINGLE PERSON. A person living alone or intending to live alone.

SPOUSE. The husband or wife of the head of the household.

SUBSIDIZED PROJECT. A multi-family housing project (with the exception of a project owned by a cooperative housing mortgage corporation or association) which receives the benefit of subsidy in the form of:

1. Below-market interest rates pursuant to Section 221(3)(3) and (5) or interest reduction payments pursuant to Section 236 of the National Housing Act; or
2. Rent supplement payments under Section 101 of the Housing and Urban Development Act of 1965; or
3. Direct loans pursuant to Section 202 of the Housing Act of 1959; or
4. Payments under the Section 23 Housing Assistance Payments Program pursuant to Section 23 of the United States Housing Act of 1937 prior to amendment by the Housing and Community Development Act of 1974;
5. Payments under the Section 8 Housing Assistance Payments Program pursuant to Section 8 of the United States Housing Act after amendment by the Housing and Community Development Act unless the project is owned by a Public Housing Agency; or
6. A Public Housing Project.

TENANT RENT. (Formerly called Net Family contribution). The amount payable monthly by the family as rent to the owner (including a PHA in other programs). Where all utilities (except telephone) and other essential housing services are supplied by the owner, Tenant Rent equals Total Tenant Payment. Where some of all utilities (except telephone) and other essential housing services are not supplied by the owner and the cost thereof is not included in the amount paid as rent to the owner, Tenant Rent equals Total Tenant Payment less the Utility Allowance in the Certificate Program. In the Voucher Program, Tenant Rent is Rent to Owner less HAP.

TOTAL TENANT PAYMENT (TTP). The total amount the HUD rent formula requires the tenant to pay toward rent and utilities.

UNIT. Residential space for the private use of a family. The size of a unit is based on the number of bedrooms contained within the unit and generally ranges from 0 bedrooms to 6 bedrooms.

UTILITIES. Utilities means water, electricity, gas, other heating, refrigeration, cooking fuels, trash collection and sewage services. Telephone service is not included as a utility.

UTILITY ALLOWANCE. The PHA's estimate of the average monthly utility bills (except telephone) for an energy-conscious household. This estimate considers only utilities paid directly by the tenant. If all utilities are included in the rent, there is no utility allowance. Utility allowances vary by unit type and are listed on the PHA's Utility Allowance Schedule.

UTILITY REIMBURSEMENT PAYMENT. The amount, if any, by which the Utility Allowance for the unit, if applicable, exceeds the Total Tenant Payment for the family occupying the unit.

VACANCY LOSS PAYMENTS. When a family vacates its unit in violation of its lease, the owner is eligible for 80% of the Contract Rent for a vacancy period of up to 1 additional month, if he notifies the PHA as soon as he learns of the vacancy, makes an effort to advertise the unit, and does not reject any eligible applicant except for good cause.

VERY LOW INCOME FAMILY. A Lower Income Family whose Annual Income does not exceed 50% of the median income for the area, as determined by HUD, with adjustments for smaller and larger families. HUD may establish income limits higher or lower than 50% of the median income for the area on the basis of its finding that such variations are necessary because of unusually high or low family incomes. This is the income limit for the Certificate and Voucher Programs.

VETERAN. A person who has served in the active military or naval service of the United States at any time and who shall have been discharged or released therefrom under conditions other than dishonorable.

ATTACHMENT I

CMHA

PEST CONTROL POLICY

AND

PROCEDURE

Pest Control Policy

CMHA's goal is to provide safe, decent and sanitary housing for its residents. In doing so CMHA's pest control policy is to limit and eradicate pest and rodents in its units and community spaces.

In eradicating and limiting pest and rodents within our developments and community spaces CMHA has specified eradication and limited contracts with three pesticide contractors. The contractors provide pest control services for elderly high rises, Family communities, and Scattered Site housing units as outlined in the environmental pest control process.

The process in the accepted proposals conform to bid specifications of February 1998. CMHA in its attempt to control and eradicate pest and assist its residents has on its staff a Housekeeping employee who is certified by the State to also perform pest control extermination. The position's primary responsibilities are to coordinate pest control schedules and services, provide immediate pest control services in the absence of contractor and to make housekeeping referrals.

The actions of CMHA reflect the seriousness to our commitments in providing safe, decent, sanitary and pest free environments for our residents.

PEST CONTROL PROCEDURE

A. INTENT

To provide pest control services for CMHA developments and community spaces. CMHA has contracted with three (3) pest control companies.

B. SCOPE OF WORK:

The implementation of a integrated pest management program, designed for the eradication of all ants, cockroaches and other household pest.

The pesticide contractor's pest management program will provide identification, prevention, monitoring and evaluation services utilizing the following tools:

1. Sanitation - Resident Education
2. Inspections
3. Baits
4. Evaluation Reports
5. Trapping (Sticky Traps, Glue Boards)
6. Flushing Agents (Pyrethrins)
7. Residual Insecticides

C. IMPLEMENTATION:

1. Prevention

Sanitation is critical in any roach control program. Contractor's will provide ongoing information to educate residents not only to the connection between sanitation and the control of unwanted pests, but to the ultimate goal of controlling the spread of germs and diseases. (See sample letter to residents.)

2. Monitoring

Each of the twelve (12) months of the contract a technician from contractors will extensively inspect (pulling stoves, refrigerators and cabinet draws, etc.) In each CMHA unit during treatments, to identify levels of infestation and target units (see Inspection Form). Technicians will utilize inspect mirrors, flashlights and sticky traps in this effort.

3. Pesticides

The primary pesticides will be Hydramethylnon (Max Force) and Abamectin (Avert) crack and crevice bait, both proven to be effective against resistant roaches while creating the least disruption to the environment (very little if any resident preparation needed). Each of the
Page 2

twelve (12) months of the contract a technician will locate cockroaches harborage areas and make bait applications directly to nesting site.

4. Evaluation

Contractor's will submit biweekly reports to CMHA outlining levels of infestations and corrective measures for management (water leaks, caulking. Etc.) And residents (sanitation). (See Evaluation Report)

D. APPROVED MATERIALS:

Contractor shall use only insecticides and materials approved by the United States Environmental Protection Agency and acceptable to the Columbus Metropolitan Housing Authority for use in commercial pest control.

E. AREA AND SERVICE FREQUENCY:

Monthly treatments of the interior of all units a outlines in specifications Bid No. 1-98. Technicians will need approximately 10-15 minutes to inspect and treat each unit. Approximate time will vary based on levels of infestation.

F. OTHER SERVICES OFFERED:

1. Sanitation Workshops

Roach control in multi-housing has always been a challenge. Communicating between the tenants, management and the pest control operator is an extremely important aspect, to control the roach population, not individual roaches.

The population in a given community is determined by the amount of food, water and harborage available. Permanent reduction in one or more vital factors will result in a permanent reduction in the (roach) population. Sanitation is thus the first and foremost requirement for permanent control.

Sanitation levels in a multi-unit housing community will vary from unit to unit. It will usually be as good or as bad as the inclination of those responsible for it. The desire for good sanitation must be in the minds of those who do the work of achieving it. Therefore, a pest control operator seeking permanent control of household pests must offer a sanitary training to educate customers not only to the close connection between sanitation and the control of pests, but to the ultimate goal of controlling the spread

of germs and diseases.

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The contractor will offer Pre-Orientation and Remedial Sanitation Safety Workshops as requested by Property Management or on-site residents in conjunction with its other services. Although educational services are customized to meet the needs of each tenant population, the following is a general outline of the workshop.

WORKSHOP OUTLINE

B. Cockroaches/rodents

1. Life cycle and habits
2. Prevention
3. Spread of germs and diseases
4. Resistance

C. Insecticide and their usage

D. Pest management: The need for a cooperative effort.

1. The role of tenants, management and the pest control operator.

E. Sanitation tips for controlling vita factors (food, water, and harborage).

1. Property disposal of garbage
2. Proper food storage
3. Proper unit maintenance

G. Residents and Management Meetings

A representative of the pest control company will be required to attend Resident Council meetings to address tenant concerns. A schedule of meetings for a one year period will be made available to the contractor at the time of contract award. Meetings will be a requirement for the first quarter of the contract and as requested during the remainder of the contract. Meeting will not be mandatory for the scattered site contractor. Property Management will be responsible for contacting the contractors.

Meetings will also be scheduled on and as need basis with select CMHA personnel and the

contractor. These meeting will be mandatory and will be used to maintain communication and to discuss any problem areas as they arise.

H. Requirements

CMHA will require all work to be completed as specified. CMHA will refuse payment of
Page 4

invoices in which any work has not been completed to our specifications and will be held until such work has been completed to CMHA's satisfaction.

II. Schedule of Treatment

CMHA's Housing Inspector, in conjunction with the contractor, will submit at the beginning of the contractor period, a quarterly schedule stating time and date(s) of each community to be treated, allowing sufficient advance notice to residents.

CMHA's management will supply keys and authorize personnel to unlock and lock doors to all common areas. The contractor will provide written notification to management of units that are occupied by residents who will not allow contractor's to service their units.

Dear Resident:

Following these helpful hints will greatly reduce the possibility of cockroach infestation. Always remember our goal is to limit the amount of food, water and shelter available to unwanted pest.

1. Always keep sinks, tubs, and counter tops dry
2. Store all goods in air tight containers
3. Place trash in plastic bags and remove frequently
4. Clean and dry all dishes
5. Clean food spills immediately
6. Clean all appliances as needed
 - (1) Stove (oven, behind, top, racks and drip pans)
 - (2) Refrigerator (behind, top)
7. Reduce excessive clutter
8. Report water leaks immediately
9. Report infestations

Cockroach control in multi-unit housing has always been a challenge but with your support we can create a healthier environment in which to live.

Sincerely,

CONTRACTOR'S INSPECTION REPORT

DATE: ___/___/___/

APARTMENT NUMBER: _____

KITCHEN:

Stove Area _____

Behind Stove _____

Inside Stove Top _____

Refrigerator Top _____

REFRIGERATOR AREA:

Refrigerator Door _____

Refrigerator Grill _____

Behind Refrigerator _____

Refrigerator Top _____

SINK AREA:

Counter Tops _____

Under Sink _____

Cabinets _____

Drawers _____

Floors _____

Walls _____

OTHER NOTES: _____

Food Storage: Poor _____ Good _____ Excellent _____

Trash in plastic bags Yes _____ No _____

BATHROOM:

Sink Area _____

Sink Top _____

Cabinets _____

Floors _____

Toilet _____

Walls _____

OTHER NOTES: _____

Trash in plastic bags? Yes _____ No _____

LIVING ROOM:

Closets _____

Walls _____

Floors _____

BEDROOM:

Closets _____

Walls _____

Floors _____

COMMENTS:

CODES:

- | | | | |
|-----|--------------------|-----|-------------------|
| (1) | Cleaning Needed | (2) | Excessive Clutter |
| (3) | Excessive Moisture | (4) | Exclusion Needed |
| (5) | Maintenance Needed | (6) | Infestation |

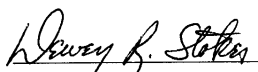
**PHA Certifications of Compliance with the PHA Plans
and Related Regulations
Board Resolution to Accompany the PHA Plan**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year Plan and Annual Plan for PHA fiscal year beginning January 1, 2000, hereinafter referred to as the Plan of which this document is a part and make the following certifications and agreements with the Department of Housing Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes the Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA will carry out the plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
7. For PHA Plan that includes a policy for site based waiting lists:
 - The PHA regularly submits required data to HUD's MTCS in an accurate, complete and timely manner (as specified in PIH Notice 99-2);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measure to assure that such waiting list is consistent with affirmatively furthering fair housing;
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).

**Certification by State or Local Official of PHA Plans Consistency with
the Consolidated Plan**

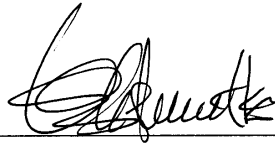
I, Dewey R. Stokes the Chair of the Franklin County Commission certify
that the Five Year and Annual PHA Plan of the Columbus Metropolitan H. A. is
consistent with the Consolidated Plan of Columbus & Franklin County prepared
pursuant to 24 CFR Part 91.

 NW. 22, 1999

Signed / Dated by Appropriate State or Local Official

**Certification by State or Local Official of PHA Plans Consistency with
the Consolidated Plan**

I, Gregory S. Lashutka the Mayor certify
that the Five Year and Annual PHA Plan of the Columbus Metropolitan H.A. is
consistent with the Consolidated Plan of City of Columbus, Ohio prepared
pursuant to 24 CFR Part 91.



Signed / Dated by Appropriate State or Local Official

Certification for a Drug-Free Workplace

U.S. Department of Housing and Urban Development

Applicant Name

Columbus Metropolitan Housing Authority

Program/Activity Receiving Federal Grant Funding

Operating Subsidy

Acting on behalf of the above named Applicant as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding the sites listed below:

I certify that the above named Applicant will or will continue to provide a drug-free workplace by:

a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

b. Establishing an on-going drug-free awareness program to inform employees ---

- (1) The dangers of drug abuse in the workplace;
- (2) The Applicant's policy of maintaining a drug-free workplace;
- (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
- (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;

d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will ---

- (1) Abide by the terms of the statement; and
- (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federalagency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---

- (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
- (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

2. **Sites for Work Performance.** The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above: Place of Performance shall include the street address, city, county, State, and zip code. Identify each sheet with the Applicant name and address and the program/activity receiving grant funding.)

Central Office: 960 East 5th Avenue
Columbus, Ohio 43201-3096
Franklin County

Low Rental Housing: On Site Rental: List Attached

Check here if there are workplaces on file that are not identified on the attached sheets.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties.
(18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)


Name of Authorized Official

Dennis S. Guest

Title

Executive Director

Signature

X 

Date

11-23-99

COLUMBUS METROPOLITAN HOUSING AUTHORITY
 LOW RENTAL HOUSING
 Onsite Locations

Type of Community	Project Number	Community	Address	City	County	State	Zip Code
Family	OH-001-001	Poindexter Village	240 N. Champion Ave.	Columbus	Franklin	OH	43203
Family	OH-001-002	Lincoln Park Homes	1755 S. 20th	Columbus	Franklin	OH	43207
Family	OH-001-003	Riverside Bradley	241 McDowell St.	Columbus	Franklin	OH	43215
Family	OH-001-005	Rosewind	1424 Brooks Ave.	Columbus	Franklin	OH	43211
Senior	OH-001-006	Sunshine Terrace	241 McDowell St.	Columbus	Franklin	OH	43215
Family	OH-001-007	Poindexter	240 N. Champion Ave.	Columbus	Franklin	OH	43203
Family	OH-001-008	Lincoln Park	1755 S. 20th	Columbus	Franklin	OH	43207
Family	OH-001-010	Sawyer Manor	940 Caldwell Pl.	Columbus	Franklin	OH	43223
Senior	OH-001-012	Jenkins Terrace	1100 E. Broad St.	Columbus	Franklin	OH	43205
Senior	OH-001-013	Taylor Terrace	88 E. 1st Ave.	Columbus	Franklin	OH	43201
Senior	OH-001-014	Worley Terrace	99 S. Central Ave.	Columbus	Franklin	OH	43222
Senior	OH-001-015	Sunshine Annex	241 McDowell	Columbus	Franklin	OH	43215
Family	OH-001-018	Scattered Sites	960 E. 5th Ave.	Columbus	Franklin	OH	43201
Senior	OH-001-020	Marion Square	1316 Marion Rd.	Columbus	Franklin	OH	43213
Family	OH-001-021	Scattered Sites	960 E. 5th Ave.	Columbus	Franklin	OH	43201
Family	OH-001-028	Ohio Townhouses	2762 Brentnell Ave.	Columbus	Franklin	OH	43211
Family	OH-001-033	Kenmore Square	1720 Kenmore Rd.	Columbus	Franklin	OH	43219
Family	OH-001-034	Indian Meadows	4050 Southpoint	Columbus	Franklin	OH	43207
Family	OH-001-035	Post Oak Station	1383 Vida Way	Columbus	Franklin	OH	43228
Family	OH-001-037	Glenview Estate	4625 Glengrove Ln.	Columbus	Franklin	OH	43231
Senior	OH-001-038	Maplewood Heights	91 Maplewood Ave.	Columbus	Franklin	OH	43213
Senior	OH-001-039	Bollinger Tower	750 N. High St.	Columbus	Franklin	OH	43215
Family	OH-001-040	Eastmoor Square	59 Alexander Ln.	Columbus	Franklin	OH	43213
Family	OH-001-041	Reeb-Hosack	1316 Marion Rd.	Columbus	Franklin	OH	43207
Family	OH-001-042	Canonby Court	755 Canonby Pl.	Columbus	Franklin	OH	43223
Family	OH-001-043	Thornwood Commons	1110 Olmstead Ave.	Columbus	Franklin	OH	43201
Family	OH-001-044	Trevitt Heights	940 Caldwell	Columbus	Franklin	OH	43203
Family	OH-001-046	Post Oak II	1383 Vida Way	Columbus	Franklin	OH	43228
Senior	OH-001-199	Sawyer Towers	975 Caldwell Pl	Columbus	Franklin	OH	43203

**Certification of Payments
to Influence Federal Transactions**

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

Applicant Name

Columbus Metropolitan Housing Authority

Program/Activity Receiving Federal Grant Funding

(1). Operating Subsidy (2). Drug Elimination Grants (3). Comprehensive Grant Program

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties.
(18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

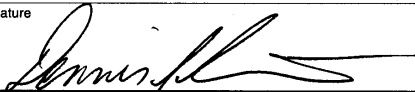
Name of Authorized Official

Dennis S. Guest

Title

Executive Director

Signature

X 

Date

11-23-99

Previous edition is obsolete

form HUD 50071 (3/98)
ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3