

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

PHA Plans

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

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

**PHA Plan
Agency Identification**

PHA Name: The Housing Authority of the City of Woonsocket, Rhode Island

PHA Number: RI003

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
- PHA development management offices
- PHA local offices

Display Locations For PHA Plans and Supporting Documents

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

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

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

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

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

A. Mission

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

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

The Woonsocket Housing Authority is dedicated to excellence in providing quality, affordable and safe housing to eligible persons consistent with community needs.

We foster effective and creative partnerships to maximize opportunities that improve economic and personal well-being of the persons we serve.

Our agency conducts its business in an efficient, professional and ethical manner without discrimination.

B. Goals

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

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

- PHA Goal: Expand the supply of assisted housing
Objectives:
- Apply for additional rental vouchers:
 - Reduce public housing vacancies:
 - Leverage private or other public funds to create additional housing opportunities:
 - Acquire or build units or developments
 - Other (list below)
- PHA Goal: Improve the quality of assisted housing
Objectives:
- Improve public housing management: (PHAS score)
 - Improve voucher management: (SEMAP score)

- Increase customer satisfaction:
- Concentrate on efforts to improve specific management functions:
(list; e.g., public housing finance; voucher unit inspections)
- Renovate or modernize public housing units:
- Demolish or dispose of obsolete public housing:
- Provide replacement public housing:
- Provide replacement vouchers:
- Other: (list below)

- PHA Goal: Increase assisted housing choices

Objectives:

- Provide voucher mobility counseling:
- Conduct outreach efforts to potential voucher landlords
- Increase voucher payment standards
- Implement voucher homeownership program:
- Implement public housing or other homeownership programs:
- Implement public housing site-based waiting lists:
- Convert public housing to vouchers:
- Other: (list below)

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

- PHA Goal: Provide an improved living environment

Objectives:

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

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

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

Objectives:

- Increase the number and percentage of employed persons in assisted families:

- Provide or attract supportive services to improve assistance recipients' employability:
- Provide or attract supportive services to increase independence for the elderly or families with disabilities.
- Other: (list below)

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

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

Other PHA Goals and Objectives: (list below)

The following represent the Woonsocket Housing Authority Goals:

Goal 1—Provide quality, affordable, equal-opportunity housing consistent with applicant and resident needs

1. Maintain high performance status with HUD: (PHAS score).
2. Improve voucher management: (SEMAP score).
3. Develop marketing and outreach strategy and improve specific management functions to achieve and maintain 100% occupancy in public housing.
4. Develop marketing and outreach strategy and improve specific management functions to achieve and maintain 100% in Section 8.
5. Implement Service Center to enhance customer satisfaction.
6. Evaluate and implement site-based waiting list.
7. Implement Redevelopment Master Plan at Veteran's Memorial.
8. Implement Redevelopment Master Plan at Morin Heights.
9. Renovate efficiency apartments at Parkview elderly high-rise to better meet space needs of residents (combine 0-bedrooms).
10. Address unit size and configuration at Crepeau Court and St. Germain Manor elderly high-rises.
11. Update leasing materials and resident handbooks and create related video presentation.

12. Provide one for one replacement of public housing and/or replacement vouchers as existing living units decline through redevelopment and conversions, except for the conversion of forty-four zero bedroom units at Parkview Manor, the twelve dwelling units already converted at Veterans Memorial with HUD approval, and the two dwelling units already converted at Morin Heights with HUD approval
13. Provide voucher mobility counseling and landlord outreach.
14. Establish 15% of available Section 8 vouchers as project based.
15. Apply for additional Section 8 vouchers funding, as it becomes available.

Goal 2—Ensure a safe, drug-free environment within our community

1. Maintain, refine and monitor MOUs and Contracts with Woonsocket Police Department for Community Policing, Detail Officers and Operation Safe Home.
2. Increase participation in resident patrols.
3. Increase participation in drug prevention activities especially among the 16-to-21 age group.
4. Establish a central location for monitoring of surveillance equipment and access control.
5. Upgrade direct access control for all high-rise buildings and associated apartments.
6. Refine emergency egress and evacuation plans for high-rises buildings and communicate the plans to the residents.
7. Increase participation of PH residents in sponsored domestic violence, elder abuse and substance abuse programs.
8. Establish and implement fraud prevention and investigation.

Goal 3-Develop a continuum of housing options consistent with community needs

1. Develop home ownership opportunities.
2. Develop a housing and supportive service strategy to address integrated communities in high-rise buildings including evaluating needs and allocation development.
3. Conduct needs assessment for frail assessment for frail high-rise residents to determine need and if feasible establish assisted living program.

Goal 4-Advance self-sufficiency and quality of life for public-housing residents and Section 8 participants

1. Increase Campus of Learners participants.
2. Increase participation in volunteer programs and the number of volunteer opportunities.
3. Establish on-site health focus program in family developments.
4. Increase participation in computer training.

5. Expand and increase participation of financial management programming.
6. Increase day care slots for PH and Section 8 residents.
7. Promote day care training opportunities that include all family & elderly developments and Section 8 residents in which residents would be licensed home day care providers.
8. Conduct needs assessment of residents and assessment of area job market pool.
9. Provide vocational training to residents.
10. Expand FSS slots for Section 8 Program.
11. Establish an adult day care program at one high-rise for use of all qualified residents.
12. Establish business opportunities to public housing residents to become self-sufficient by providing entrepreneurial business workshops.

Goal 5—Manage assets in a fiscally responsible and accountable manner.

1. Update office computer equipment integrating modern technology.
2. Bring in-house 24-hour answering service function—now performed externally.
3. Expand general ledger control over property, equipment and inventory.
4. Obtain grants and donations from public and private sectors.
5. Expand bulk purchasing process using vendor warehousing.
6. Explore activities that would generate additional income to the Housing Authority.
7. Reduce telephone and other sundry costs.

Goal 6—Promote a positive environment that encourages staff development, participation, and well-being

1. Evaluate Authority's staffing needs during annual budget process.
2. Provide ongoing staff computer, customer service, subsidized housing, real estate finance and professional development training opportunities, cross-training where appropriate.
3. Diversify staff to reflect resident population.
4. Perform annual employee evaluations for all staff.
5. Implement team approach to decision making.
6. Develop enhanced staff communication.
7. Update personnel policy to include policy for part-timers and volunteers.
8. Conduct annual site visits of all properties with management and administrative staff, promoting cross-organization awareness.

Goal 7—Develop a positive working relation with the resident organizations of the Woonsocket Housing Authority.

1. To formalize the Resident Advisory Board (RAB) through supporting the creation of by-laws, process for membership to the RAB and a MOU with the Housing Authority.
2. Review and update MOU with resident associations.
3. Work with resident organizations to establish a resident participation policy.
4. To evaluate the availability of additional financial resources for the Resident Advisory Board and other resident associations.

**Annual PHA Plan
PHA Fiscal Year 2000**

[24 CFR Part 903.7]

i. Annual Plan Type:

Select which type of Annual Plan the PHA will submit.

Standard Plan

Streamlined Plan:

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

Troubled Agency Plan

ii. Executive Summary of the Annual PHA Plan

[24 CFR Part 903.7 9 (r)]

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

The Woonsocket Housing Authority owns and operates 1,291 units of public housing and 334 Section 8 subsidies. The jurisdiction of the Woonsocket Housing Authority is the city of Woonsocket, Rhode Island. The City of Woonsocket has a population of approximately 42,000 people. The city is located at the northwest section of the State of Rhode Island. The city has experienced a 20% drop in population since the 1950's. 66% of the housing units is available for rent, of which 17% of rental are subsidized. This includes the public housing living units. This represents the highest portion of subsidized housing in any community throughout the State of Rhode Island.

While there is a large number of subsidized units, there continues to be an unmet need, especially for those families with incomes at 30% of minimum or less. Since the 1970's there has been a growing minority population which is predominantly of Hispanic origin.

The Housing Authority, in developing its 5-Year Plan, focused on the challenge of continuing to provide housing for very low income families as well as the challenge of de-concentrating high levels of poverty. This will be accomplished during the course of the 5-years through preserving and remodeling the existing living units, applying for more Section 8 subsidies as availability arises and strengthening its Family Self Sufficiency and Drug Elimination Programs to help existing families out of poverty. Discretionary policies included in the Plan are preferences for families displaced by natural disaster and/or governmental action, preferences for victims of domestic violence and a preference for law enforcement personnel in family developments. In addition, for rent redeterminations, families will not be required to report any increase of incomes of less than \$100/month and

out of pocket support and alimony payments will be considered allowable deductions and the Woonsocket Housing authority will also exclude any portion of health insurance a family pays to obtain medical insurance.

During the first year of the Plan the Housing Authority will be concentrating on achieving a 100% lease up level in Section 8 and 100% occupancy in public housing.

Major initiatives that the Housing Authority will pursue during the course of the next five years will include seeking funds for major redevelopment of its two family developments, continued and aggressive use of capital funds to preserve the elderly high-rise living units and also will review new regulations concerning home ownership programs so that PH residents as they achieve self-sufficiency can move into surrounding neighborhoods.

This plan was accomplished through the hard and dedicated work of Housing Authority staff and Housing Authority Commissioners. In the early stages of the planning process, a Resident Advisory Board was formed and weekly meetings were held with residents and their housing advocate. Their input throughout this process proved invaluable. In addition, the city and larger community were also consulted. This process should insure the success of the WHA's Five-Year Plan for the new millenium.

iii. Annual Plan Table of Contents

[24 CFR Part 903.7 9 (r)]

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

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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:

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

Optional Attachments:

- X (Attachment D) PHA Management Organizational Chart

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

Supporting Documents Available for Review

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

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
X	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations	5 Year and Annual Plans
X	State/Local Government Certification of Consistency with the Consolidated Plan	5 Year and Annual Plans
X	Fair Housing Documentation: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions’ initiatives to affirmatively further fair housing that require the PHA’s involvement.	5 Year and Annual Plans
X	Consolidated Plan for the jurisdiction/s in which the PHA is located (which includes the Analysis of Impediments to Fair Housing Choice (AI)) and any additional backup data to support statement of housing needs in the jurisdiction	Annual Plan: Housing Needs
X	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources;
X	Public Housing Admissions and (Continued) Occupancy Policy (A&O), which includes the Tenant Selection and Assignment Plan [TSAP]	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public Housing Deconcentration and Income Mixing Documentation: 1. PHA board certifications of compliance with deconcentration requirements (section 16(a) of the US Housing Act of 1937, as implemented in the 2/18/99 <i>Quality Housing and Work Responsibility Act Initial Guidance; Notice</i> and any further HUD guidance) and 2. Documentation of the required deconcentration and income mixing analysis	Annual Plan: Eligibility, Selection, and Admissions Policies

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
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
X	Schedule of flat rents offered at each public housing development * (using ceiling rents) <input type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies <input checked="" type="checkbox"/> 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 <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
X	Section 8 informal review and hearing procedures <input checked="" type="checkbox"/> 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
X	Most recent, approved 5 Year Action Plan for the Capital Fund/Comprehensive Grant Program, if not included as an attachment (provided at PHA option)	Annual Plan: Capital Needs
	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans or any other approved proposal for development of public housing	Annual Plan: Capital Needs
	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition
	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing
	Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act	Annual Plan: Conversion of Public Housing
	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership
	Policies governing any Section 8 Homeownership program <input type="checkbox"/> check here if included in the Section 8 Administrative Plan	Annual Plan: Homeownership
	Any cooperative agreement between the PHA and the TANF agency	Annual Plan: Community Service & Self-Sufficiency

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
X	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
X	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports	Annual Plan: Community Service & Self-Sufficiency
X	The most recent Public Housing Drug Elimination Program (PHEDEP) semi-annual performance report for any open grant and most recently submitted PHDEP application (PHDEP Plan)	Annual Plan: Safety and Crime Prevention
X	The most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U. S.C. 1437c(h)), the results of that audit and the PHA's response to any findings	Annual Plan: Annual Audit
	Troubled PHAs: MOA/Recovery Plan	Troubled PHAs
X	Other supporting documents (optional) (list individually; use as many lines as necessary) Executive Summary for Veteran' Memorial Campus of Learners and Morin Heights Family Housing Master Plan	(specify as needed)

1. Statement of Housing Needs

[24 CFR Part 903.7 9 (a)]

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

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

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	*Overall 1	Afford- ability	Supply	Quality	Access- ibility	Size	Loca- tion
Income <= 30% of AMI	30%	5	3	4	3	3	5
Income >30% but <=50% of AMI	13%	4	3	4	3	3	5
Income >50% but <80% of AMI	10%	3	3	4	3	3	3
Elderly	33%	3	2	2	2	2	3
Families with	15%	5	2	2	2	2	3

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	*Overall 1	Afford- ability	Supply	Quality	Access- ibility	Size	Loca- tion
Disabilities							
Race/Ethnicity Hispanic origin	10%	5	3	4	3	3	5
Race/Ethnicity							
Race/Ethnicity							
Race/Ethnicity							

* Data estimates based on 1990 Data

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.)

- X Consolidated Plan of the Jurisdiction/s
Indicate year: 1998/1999
- X U.S. Census data: the Comprehensive Housing Affordability Strategy
("CHAS") dataset 1990
- X American Housing Survey data
Indicate year: 1998
- Other housing market study
Indicate year:
- X Other sources: (list and indicate year of information)

City of Woonsocket Comprehensive Plan, 1998-1999
1999 Rhode Island Kids Count Fact Book
Housing Data Base 1996, State of Rhode Island, Division of Planning,

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

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

Housing Needs of Families on the Waiting List			
Waiting list type: (select one)			
<input type="checkbox"/> Section 8 tenant-based assistance			
<input checked="" type="checkbox"/> Public Housing			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	298	100%	
Extremely low income <=30% AMI	214	72%	
Very low income (>30% but <=50% AMI)	58	19%	
Low income (>50% but <80% AMI)	26	9%	
Families with children	174	58%	
Elderly families	59	20%	
Families with Disabilities	68	23%	
Race/ethnicity	White: 137	46%	
Race/ethnicity	Black: 36	12%	
Race/ethnicity	Asian/P.I.: 4	1%	
Race/ethnicity	Hispanic: 121	41%	
Characteristics by Bedroom Size (Public Housing Only)			282 units
			22%
1BR	111	37%	
2 BR	95	32%	
3 BR	76	26%	
4 BR	16	5%	

Housing Needs of Families on the Waiting List			
5 BR	0	0	
5+ BR	0	0	
Is the waiting list closed (select one)? X No <input type="checkbox"/> Yes			
If yes:			
How long has it been closed (# of months)?			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes			

Housing Needs of Families on the Waiting List			
Waiting list type: (select one)			
X Section 8 tenant-based assistance * SEE BELOW			
Public Housing			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	505	100%	
Extremely low income <=30% AMI	420	83%	
Very low income (>30% but <=50% AMI)	76	15%	
Low income (>50% but <80% AMI)	11	2%	
Families with children	382	76%	
Elderly families	22	4%	
Families with Disabilities	67	13%	
Race/ethnicity	White:	N/A	
Race/ethnicity	Black:		
Race/ethnicity	Asian/P.I.:		
Race/ethnicity	Hispanic:		
Characteristics by Bedroom Size			

Housing Needs of Families on the Waiting List			
(Public Housing Only)			
1BR			
2 BR			
3 BR			
4 BR			
5 BR			
5+ BR			
Is the waiting list closed (select one)? X No <input type="checkbox"/> Yes If yes: How long has it been closed (# of months)? Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes *The Section 8 waiting list had been closed and was opened for a one week period beginning December 4, 1998 and closing December 10, 1998. All applicants filled out pre-apps and not all the information requested above is available.			

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 Woonsocket Housing Authority will address the housing needs of families in the jurisdiction and on the waiting list in the upcoming year by achieving full occupancy of public housing units and increasing Section 8 lease up rates. Because of the greatest need being families that have incomes less than 30% of AMI, the Woonsocket Housing Authority will exceed HUD federal targeting requirements. Increased efforts will be made to raise income levels of existing families in housing through self- sufficiency programs. If available, the Woonsocket Housing Authority will apply for additional Section 8 subsidies and counsel families of ability to move out of areas with high concentrations of poverty.

(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)

Need: Specific Family Types: The Elderly

Strategy 1: Target available assistance to the elderly:

Select all that apply

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

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

Select all that apply

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

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

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

Select if applicable

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

Strategy 2: Conduct activities to affirmatively further fair housing

Select all that apply

- X Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- X 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
- X Staffing constraints
- X Limited availability of sites for assisted housing
- Extent to which particular housing needs are met by other organizations in the community
- X 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
- X Community priorities regarding housing assistance
- Results of consultation with local or state government
- Results of consultation with residents and the Resident Advisory Board
- X Results of consultation with advocacy groups
- Other: (list below)

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2000 grants)		
a) Public Housing Operating Fund	\$1,900,000.	
b) Public Housing Capital Fund	3,077,000.	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	1,450,000.	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)	28,420.	
g) Resident Opportunity and Self-Sufficiency Grants	75,000	
h) Community Development Block Grant		
i) HOME		
Other Federal Grants (list below)		
Senior Service Coordinator Grant	73,011.	Public housing supportive services
2. Prior Year Federal Grants (unobligated funds only) (list below)		
CGP – FY 1998	750,000.	Public housing capital improvement
PHDEP FY 1997-1998	296,000.	Public housing safety/security
3. Public Housing Dwelling Rental Income		
	3,100,000.	Public housing operations
4. Other income (list below)		
Interest	80,000.	Public housing operations
Misc. (Laundry/Antennas)	26,000.	Public housing operations
4. Non-federal sources (list below)		
R.I. Dept Elderly Affairs	15,000.	Public housing safety/ security

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
Total resources	10,869,000.	

3. PHA Policies Governing Eligibility, Selection, and Admissions

[24 CFR Part 903.7 9 (c)]

A. Public Housing

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

(1) Eligibility

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

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

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

- X Criminal or Drug-related activity
- X Rental history
- X Housekeeping
- X Other (describe) credit report, character references

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

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

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

(2) Waiting List Organization

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

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

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

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

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

1. How many site-based waiting lists will the PHA operate in the coming year?

2. Yes No: Are any or all of the PHA's site-based waiting lists new for the upcoming year (that is, they are not part of a previously-HUD-approved site based waiting list plan)?
If yes, how many lists?

3. Yes No: May families be on more than one list simultaneously?
If yes, how many lists?

4. Where can interested persons obtain more information about and sign up to be on the site-based waiting lists (select all that apply)?

- PHA main administrative office
- All PHA development management offices
- Management offices at developments with site-based waiting lists
- At the development to which they would like to apply
- Other (list below)

(3) Assignment

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

- One
- Two
- Three or More

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

- c. If answer to b is no, list variations for any other than the primary public housing waiting list/s for the PHA: Elderly/disabled list provides 3 offers (of 4 sites) before falling to the bottom of the list. Low income developments provides 2 offers of 3 sites (one site being considered scattered sites) before being placed at the bottom of the list.

(4) Admissions Preferences

a. Income targeting:

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

b. Transfer policies:

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

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

c. Preferences

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

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

Former Federal preferences:

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

Other preferences: (select below)

- X Working families and those unable to work because of age or disability
- X Veterans ~~and veterans' families~~ (*Disabled Vets)
- X Residents who live and/or work in the jurisdiction
- X Those enrolled currently in educational, training, or upward mobility programs
- X Households that contribute to meeting income goals (broad range of incomes)
- X Households that contribute to meeting income requirements (targeting)
- X Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- X Other preference(s) (list below)
Severe medical emergency, displaced due to non-accessibility of a unit, displaced by disaster or government action; police officer; AmeriCorps or National Service Program participants

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

3 Date and Time

Former Federal preferences:

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

Other preferences (select all that apply)

- 2 Working families and those unable to work because of age or disability
- 1 Veterans ~~and veterans' families~~ (*Disabled Veterans)
- 2 Residents who live and/or work in the jurisdiction
- 2 Those enrolled currently in educational, training, or upward mobility programs
- 2 Households that contribute to meeting income goals (broad range of incomes)
- 2 Households that contribute to meeting income requirements (targeting)
- 2 Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below)
- 2 Americorps/National Service participants
- 3 Severe Medical Emergency
- 4 Displaced by Disaster/Government Action

- 5 Displaced due to non-accessibility of unit
- 6 Police Officer

4. Relationship of preferences to income targeting requirements:

- The PHA applies preferences within income tiers
- X 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)

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

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

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

(6) Deconcentration and Income Mixing

a. X 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. X 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:

- X Employing waiting list “skipping” to achieve deconcentration of poverty or income mixing goals at targeted developments
If selected, list targeted developments below:
- X Employing new admission preferences at targeted developments
If selected, list targeted developments below:
- X Other (list policies and developments targeted below)
Adopted optional earned income disregards.
- d. X 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
- X Actions to improve the marketability of certain developments
- Adoption or adjustment of ceiling rents for certain developments
- X Adoption of rent incentives to encourage deconcentration of poverty and income-mixing
- Other (list below)
- f. Based on the results of the required analysis, in which developments will the PHA make special efforts to attract or retain higher-income families? (select all that apply)
- Not applicable: results of analysis did not indicate a need for such efforts
- X List (any applicable) developments below:
Morin Heights
Veterans Memorial
- 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)
- X Not applicable: results of analysis did not indicate a need for such efforts
- List (any applicable) developments below:

B. Section 8

Exemptions: PHAs that do not administer section 8 are not required to complete sub-component 3B.

Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).

(1) Eligibility

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

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

If yes, state circumstances below:

As long as they have been actively searching for a unit.

(4) Admissions Preferences

a. Income targeting

Yes X 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. X 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)

X 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

X 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)

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)

- 1 Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans’ families
- 1 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)

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

- Date and time of application
- X 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)

- X 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
X Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

(5) Special Purpose Section 8 Assistance Programs

NOT APPLICABLE

- a. In which documents or other reference materials are the policies governing eligibility, selection, and admissions to any special-purpose section 8 program administered by the PHA contained? (select all that apply)
The Section 8 Administrative Plan
Briefing sessions and written materials
 Other (list below)
- b. How does the PHA announce the availability of any special-purpose section 8 programs to the public?
 Through published notices
 Other (list below)

4. PHA Rent Determination Policies

[24 CFR Part 903.7 9 (d)]

A. Public Housing

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

(1) Income Based Rent Policies

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

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

---or---

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

b. Minimum Rent

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

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

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

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

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

1. Yes X No: Does the PHA plan to charge rents at a fixed amount or percentage less than 30% of adjusted income?

2. If yes to above, list the amounts or percentages charged and the circumstances under which these will be used below:

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

For the earned income of a previously unemployed household member
 For increases in earned income
 Fixed amount (other than general rent-setting policy)
If yes, state amount/s and circumstances below:

Fixed percentage (other than general rent-setting policy)
If yes, state percentage/s and circumstances below:

- For household heads
 For other family members
 For transportation expenses
 For the non-reimbursed medical expenses of non-disabled or non-elderly families

- X Other (describe below)
Exclude from Earned Income amount deducted by employer for medical insurance

e. Ceiling rents

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

- X 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)

- X 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
X 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
- X Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold) \$100/MTH
- Other (list below)

g. Yes X 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 N/A

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, certificates).**

(1) Payment Standards

Describe the voucher payment standards and policies.

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

- X 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
- X Reflects market or submarket
- Other (list below)

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

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

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

- X 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)

- X 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
- X \$1-\$25
- \$26-\$50

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

5. Operations and Management

[24 CFR Part 903.7 9 (e)]

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

A. PHA Management Structure

Describe the PHA’s management structure and organization.

(select one)

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

B. HUD Programs Under PHA Management

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

Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	1,282	22%
Section 8 Vouchers	334	2%
Section 8 Certificates	*	
Section 8 Mod Rehab	N/A	
Special Purpose Section 8 Certificates/Vouchers (list individually)	N/A	
Public Housing Drug Elimination Program (PHDEP)	586	N/A
Other Federal Programs(list individually)		
Supportive Services	650	0 (no turnover)
Family Self Sufficiency	60	0 (no turnover)
	*Being converted to housing choice Vouchers	

C. Management and Maintenance Policies

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

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

Admissions and Occupancy Policy

Grievance Policy

Family and Elderly Handbooks

Pest Control Policy

Blood Borne Disease Policy

Ethics Policy

Personnel Policy

(2) Section 8 Management: (list below)

Section 8 Admin Plan

6. PHA Grievance Procedures

[24 CFR Part 903.7 9 (f)]

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

A. Public Housing

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

If yes, list additions to federal requirements below:

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

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

Select one:

- X The Capital Fund Program Annual Statement is provided as an attachment to the PHA Plan at Attachment IV

-or-

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

(2) Optional 5-Year Action Plan

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

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

b. If yes to question a, select one:

The Capital Fund Program 5-Year Action Plan is provided as an attachment to the PHA Plan at Attachment (state name

-or-

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

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

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

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

1. Development name:

2. Development (project) number:

3. Status of grant: (select the statement that best describes the current status)

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

Yes No: c) Does the PHA plan to apply for a HOPE VI Revitalization grant in the Plan year?

If yes, list development name/s below:

Veteran's Memorial Family Development

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

2. Activity Description

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

Demolition/Disposition Activity Description
1a. Development name: 1b. Development (project) number:
2. Activity type: Demolition <input type="checkbox"/> Disposition <input type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date application approved, submitted, or planned for submission: <u>(DD/MM/YY)</u>
5. Number of units affected: 6. Coverage of action (select one) <input type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity:

- a. Actual or projected start date of activity:
- b. Projected end date of activity:

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

[24 CFR Part 903.7 9 (i)]

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

1. Yes X 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.

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

<input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected:
7. Coverage of action (select one)
<input type="checkbox"/> Part of the development
<input type="checkbox"/> Total development

10. Conversion of Public Housing to Tenant-Based Assistance

[24 CFR Part 903.7 9 (j)]

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

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

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

2. Activity Description

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

Conversion of Public Housing Activity Description	
1a. Development name:	
1b. Development (project) number:	
2. What is the status of the required assessment?	<input type="checkbox"/> Assessment underway <input type="checkbox"/> Assessment results submitted to HUD <input type="checkbox"/> Assessment results approved by HUD (if marked, proceed to next question) <input type="checkbox"/> Other (explain below)
3. <input type="checkbox"/> Yes <input type="checkbox"/> No: Is a Conversion Plan required? (If yes, go to block 4; if no, go to block 5.)	
4. Status of Conversion Plan (select the statement that best describes the current status)	<input type="checkbox"/> Conversion Plan in development <input type="checkbox"/> Conversion Plan submitted to HUD on: (DD/MM/YYYY)

<input type="checkbox"/> Conversion Plan approved by HUD on: (DD/MM/YYYY) <input type="checkbox"/> Activities pursuant to HUD-approved Conversion Plan underway
<p>5. Description of how requirements of Section 202 are being satisfied by means other than conversion (select one)</p> <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 X No: Does the PHA administer any homeownership programs administered by the PHA under an approved section 5(h) homeownership program (42 U.S.C. 1437c(h)), or an approved HOPE I program (42 U.S.C. 1437aaa) or has the PHA applied or plan to apply to administer any homeownership programs under section 5(h), the HOPE I program, or section 32 of the U.S. Housing Act of 1937 (42 U.S.C. 1437z-4). (If “No”, skip to component 11B; if “yes”, complete one activity description for each applicable program/plan, unless eligible to complete a streamlined submission due to **small PHA** or **high performing**

PHA status. PHAs completing streamlined submissions may skip to component 11B.)

2. Activity Description

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

Public Housing Homeownership Activity Description (Complete one for each development affected)	
1a. Development name:	
1b. Development (project) number:	
2. Federal Program authority:	<input type="checkbox"/> HOPE I <input type="checkbox"/> 5(h) <input type="checkbox"/> Turnkey III <input type="checkbox"/> Section 32 of the USHA of 1937 (effective 10/1/99)
3. Application status: (select one)	<input type="checkbox"/> Approved; included in the PHA’s Homeownership Plan/Program <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date Homeownership Plan/Program approved, submitted, or planned for submission: (DD/MM/YYYY)	
5. Number of units affected:	
6. Coverage of action: (select one)	<input type="checkbox"/> Part of the development <input type="checkbox"/> Total development

B. Section 8 Tenant Based Assistance

1. X 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 (1)]

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

A. PHA Coordination with the Welfare (TANF) Agency

1. Cooperative agreements:

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

If yes, what was the date that agreement was signed? 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

X 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)
Better Health Collaborative – Preventive Health Promotion Programming	200 residents	Other	PHA Highrise Resident Services Department	Public housing residents
Telephone Reassurance Program – Once a day health and safety check	25 residents	Other	PHA Security Department	Public housing residents
Americorps*VISTA Program – Volunteer develops health programs, socialization and volunteer opportunities	100 residents	Other	PHA Highrise Resident Services Department	Public housing residents
Computer Labs	75 residents	Other	PHA Highrise Resident Services Department	Public housing residents
Transportation to medical appointments	90 residents	Specific criteria	PHA Highrise Resident Services Department	Public housing residents
Meal-Site Program – Noon day meals served in the community room of each highrise	15,000 meals served annually	Other	Woonsocket Senior Services	Public housing residents
Home delivered meal program – Noon day meals delivered to apartments	9000 meals served annually	Specific criteria	Woonsocket Retired Senior Volunteer Program	Public housing residents
Transportation to local markets	50 residents per week	Other	PHA Highrise Resident Services Department	Public housing residents

Movie Nights	360 residents	Other	PHA Highrise Resident Services Department	Public housing residents
Mental Health Support Group	40 residents	Other	PHA Highrise Resident Services Department	Public housing residents
Line Dancing Classes	40 residents	Other	PHA Highrise Resident Services Department	Public housing residents
Quarterly newsletter	750 residents	Other	PHA Highrise Resident Services Department	Public housing residents
Project Linus – Group of resident volunteers make quilts for hospitalized children	10 residents	Other	PHA Highrise Resident Services Department	Public housing residents
Campus of Learners Program-Workshops in Child Abuse & Neglect, Financial Planning, Families in Crisis, etc	14 residents	Specific criteria	Campus of Learners Buildings at Veterans Memorial Development	Public housing residents
Project Build Program	6 young adults	Specific Criteria	Campus of Learners Buildings at Veterans Memorial Development	Both & Community
Monthly Calendar in English and Spanish	635 households	Other	PHA Family Resident Services Department	Public housing residents
GED, ESL and Literacy Classes	70 adults	Other	Project RIRAL and Retired Senior Volunteer Program	Both & Community
Fairmount Branch Library	3513 items circulated	Other	A branch of the City's Woonsocket Harris Library	Both & Community
Office & Procedures Training	8 adults	Other	Training & Learning Channels	Public Housing residents
Kids First Garden Nutrition Program	15 children	Other	Kids First, Inc Share Our Strength	Public Housing residents
Learning Express- A Tutoring & Mentoring Program	30 students	Specific	Woonsocket Education Dept. WHA	Public Housing residents
Health Adventures Program- Helping youngsters learn about careers in the health field	15 middle school students	Specific	Landmark Hospital Retired Senior Volunteer Program, WHA	Public Housing residents
Kids Kare Program-after school reading program grades K-3.	40 children	Specific	Retired Senior Volunteer Program	Public Housing residents
Adventures in Law Academy-mentoring and career exploration program	13 students	Other	Retired Senior Volunteer Program, Woonsocket Police Department	Public Housing residents
Sports Medley Program-At the local YMCA providing	109 youths	Other	YMCA	Public Housing residents

recreational activities				
Athletic Scholarships	8 youths	Other	Cracovia Soccer League	Public Housing residents
Woonsocket Head Start Therapeutic Summer Camp	12 youths	Specific Criteria	Woonsocket Head Start	Public Housing residents
Boy Scouts/Cub Scouts	20 boys	Other	Boy Scouts of America	Public Housing residents, Section 8 and Community
Girl Scouts	12 girls	Other	Girl Scouts of America	Public Housing residents, Section 8 and Community
Summer Camps	99 youths	Other	YMCA, Boy Scouts, Camp Costa,	Public Housing residents
Cyberbuilders Summer Computer Camps	16 residents	Other	Northern RI Private Industry Council	Public Housing residents
Computer Labs at Family Developments	1012 residents (number may be duplicated)	Other	PHA Family Resident Services Department	Public Housing residents
VISTA-Volunteers help to develop leadership skills among Resident Assoc. & promotes vocational & socialization activities	300 residents	Other	PHA Family Resident Services Department	Public Housing residents
City Year Serve-A-thon Annual service day at the WHA developments	200 volunteers (staff, residents, community members)	Other	City Year of Rhode Island	Everyone
City Year School Vacation Camps	350 youths	Other	City Year of Rhode Island	Public Housing residents, Section 8 and Community

(2) Family Self Sufficiency program/s*

a. Participation Description

Family Self Sufficiency (FSS) Participation		
Program	Required Number of Participants (start of FY 2000 Estimate)	Actual Number of Participants (As of: DD/MM/YY)
Public Housing	Not mandated -21	21 (09/08/99)
Section 8	Not mandated-39	29 (09/08/99)

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:

*The Woonsocket Housing Authority is not mandated to have a Family Self Sufficiency Program. Our program size is 60. We are gearing it more towards Section 8 households and encouraging Public Housing residents to participate in our Campus of Learners Program.

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)
- X Adopting appropriate changes to the PHA's public housing rent determination policies and train staff to carry out those policies
 - X Informing residents of new policy on admission and reexamination
 - X Actively notifying residents of new policy at times in addition to admission and reexamination.
 - X Establishing or pursuing a cooperative agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services
 - X 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)]

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

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

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

- High incidence of violent and/or drug-related crime in some or all of the PHA's developments
- X High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to the PHA's developments
- X Residents fearful for their safety and/or the safety of their children
- X 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).

- X Safety and security survey of residents
- X 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
- X Resident reports
- X PHA employee reports
- X Police reports
- X Demonstrable, quantifiable success with previous or ongoing anticrime/anti drug programs
- Other (describe below)

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

Morin Heights
Veterans Memorial

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)

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

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

Morin Heights

Veterans Memorial

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)

- X Police involvement in development, implementation, and/or ongoing evaluation of drug-elimination plan
- X Police provide crime data to housing authority staff for analysis and action
- X Police have established a physical presence on housing authority property (e.g., community policing office, officer in residence)
- X Police regularly testify in and otherwise support eviction cases
- X Police regularly meet with the PHA management and residents
- X 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)

Morin Heights
Veterans Memorial

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.

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

14. RESERVED FOR PET POLICY

[24 CFR Part 903.7 9 (n)]

15. Civil Rights Certifications

[24 CFR Part 903.7 9 (o)]

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

16. Fiscal Audit

[24 CFR Part 903.7 9 (p)]

1. X 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. X Yes No: Was the most recent fiscal audit submitted to HUD?
3. Yes X 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. X 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
X Development-based accounting
 Comprehensive stock assessment
 Other: (list below)
3. Yes X No: Has the PHA included descriptions of asset management activities in the **optional** Public Housing Asset Management Table?

18. Other Information

[24 CFR Part 903.7 9 (r)]

A. Resident Advisory Board Recommendations

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

2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)
 X Attached at Attachment (File name) RAB COMMENTS
 X Provided below:

When reviewing the Authority's Mission Statement which read in part (client) the recommendation was made by the RAB to change the wording in the mission statement to read "the people that we serve".

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.
- X The PHA changed portions of the PHA Plan in response to comments
 List changes below:
 The Authority changed its Mission Statement to read "...the people that we serve".
 Amended Goal 1, Objective 12, amended wording in the document to replace the word "stock" with "living units",
 Added Goal 7,
 Amended wording in Executive Summary relative to "living units",
 Supporting Documents, added Site Plans,
 Reasons for Selecting Strategies, added Results of consultation w/residents and the RAB,
 Assignment amended choices and verbiage under c., under Former Federal preferences added Homelessness, same addition on next page, added 2,
 Homelessness as a former Federal preference,
 6, Deconcentration added X to Other, Adopted optional earned income disregards,
 Rent Determination Policies, added d. Other, Exclude from income alimony and child support payments,
 Section 8 Tenant Based Assistance, item 1, checked off Yes box, under 18,
 Other Information checked off 2 Attached File Name RAB Comments,
 3 listed the changes, and amended Resolution 885, Deconcentration of Poverty.
- Other: (list below)

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

1. Yes X 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.)

N/A

There is currently no resident on the Board but the appointing official is being encouraged to appoint a resident to fill the next vacancy in accordance to the proposed rule.

3. Description of Resident Election Process

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

- Candidates were nominated by resident and assisted family organizations
- Candidates could be nominated by any adult recipient of PHA assistance
- Self-nomination: Candidates registered with the PHA and requested a place on ballot
- Other: (describe)

b. Eligible candidates: (select one)

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

c. Eligible voters: (select all that apply)

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

C. Statement of Consistency with the Consolidated Plan

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

1. Consolidated Plan jurisdiction: City of Woonsocket, Rhode Island
Consolidated Plan

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)

- X The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- X The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- X The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.

X 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)

Maintenance of existing subsidized living units.

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

Support of maintaining existing subsidized living units and commitment, assisting and promoting rehab of aging rental living units.

D. Other Information Required by HUD

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

Attachments

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

1. Certifications
 - PHA Plan Certifications
 - State/Local Government Certificate
 - Fair Housing Documentation
2. Consolidated Plan
3. Operating Budget
4. Admissions and Occupancy Policy
5. Section 8 Admin Plan
6. Public Housing Deconcentration Documentation
7. Rent Determination Policies (in the Admission Policy and Section 8 Admin Plan)
8. Schedule of Flat Rents (the Authority is using Ceiling Rents)
9. PH management and maintenance Policies (including pest policy)
10. Grievance Procedures
11. 5 Year Action Plan for Capital Fund/Comp Grant Program
12. FSS Action Plan
13. Self-Sufficiency Grant Program Reports
14. Drug Elimination semi annual performance report
15. Most Recent Fiscal year audit

PHA Plan Table Library

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

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

Capital Fund Grant Number FFY of Grant Approval: (MM/YYYY)

Original Annual Statement

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

Annual Statement
Capital Fund Program (CFP) Part II: Supporting Table

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost

Annual Statement
Capital Fund Program (CFP) Part III: Implementation Schedule

Development Number/Name HA-Wide Activities	All Funds Obligated (Quarter Ending Date)	All Funds Expended (Quarter Ending Date)

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

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

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Total estimated cost over next 5 years				

**Attachment A
Resolution 885
As amended
Deconcentration of Poverty**

Whereas, the Quality Housing and Work Responsibility Act of 1998 requires Housing Authorities to develop policies that are designed to provide for the deconcentration of poverty and income mixing by increasing the number of higher income families in lower income developments and increasing the number of lower income families in higher income public housing developments, and

Whereas, the Woonsocket Housing Authority has adopted optional income disregards including an income disregard where the Housing Authority will exclude from annual income interim increases in household incomes less than \$100 per month.

Whereas, the Woonsocket Housing Authority has established a preference for working persons and persons near working, and

Whereas, the Housing Authority has established a ceiling rent to sustain families whose incomes increase, and

Whereas, the Housing Authority has a Campus of Learners and a Family Self-Sufficiency Program to promote residents becoming wage earners, and

Whereas the Housing Authority has developed a Master Plan for its two family developments with enhancements to further attract a broader range of incomes.

Whereas, the Woonsocket Housing Authority developments, RI 3-1 Morin Heights, RI 3-2 Veteran's Memorial, RI 3-7 and 3-8 Scattered Sites, RI 3-3 Parkview Manor, RI 3-4 Kennedy Manor, RI 3-5 St. Germain Manor and RI 3-6 Crepeau Court are subject to the aforementioned deconcentration, and

NOW THEREFORE, be it resolved:

Section 1: The Woonsocket Housing Authority has implemented a public housing deconcentration of poverty policy that primarily relies on increasing the incomes of persons already living in its public housing developments by providing incentives for working families to remain in public housing. Further, the Woonsocket Housing Authority will monitor the effects of the agency's policy and, as necessary, make future revisions in its admissions policy in consultation with the Woonsocket Residents Advisory Board, to continue to provide for deconcentration of poverty, income mixing.

Section 2: This Resolution shall be effective upon passage.

**Annual Statement/Performance
and Evaluation Report**

Part I: Summary
Comprehensive Grant Program (CGP)

**U. S. DEPARTMENT OF HOUSING
and Urban Development
Office of Public and Indian Housing**

OMB Approved No. 2577-0157 (Exp. 07/31/95)

Public Reporting Burden for this collection of information is estimated to average 75.0 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Reports Management Officer, Office of Information Policies and Systems, U.S. Department of Housing and Urban Development, Washington, D.C. 20410-3600 and to the Office of Management and Budget, -Paperwork Reduction Project (2577-0157), Washington, D.C. 20503. Do not send this completed form to either of these addresses.

PHA/IHA Name Woonsocket Housing Authority	Comprehensive Grant Number RI 43-P003-70900	FFY of Grant Approval 2000
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Original Annual Statement Reserve for Disasters/ Emergencies ___ Revised Annual Statement/ Revision Number ___ Performance and Evaluation Report for Program Year Ending _____

Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost *	
		Original	Revised	Obligated	Expended
1	Total Non-CGP Funds				
2	1406 Operating Subsidy				
3	1408 Management Improvements 1/	285,000			
4	1410 Administration 2/	150,000			
5	1411 Audit	0			
6	1415 Liquidated Damages	0			
7	1430 Fees and Costs	137,486			
8	1440 Site Acquisition	0			
9	1450 Site Improvement	1,047,945			
10	1460 Dwelling Structures	1,242,000			
11	1465.1 Dwelling Equipment - Nonexpendable	0			
12	1470 Nondwelling Structures	0			
13	1475 Nondwelling Equipment	0			
14	1495.1 Relocation Costs				
15	1490 Replacement Reserve				
16	1502 Contingency (may not exceed 8% of line 17)				
17	Amount of Annual Grant (Sum of lines 2-16)	2,862,431			
18	Amount of line 17 Related to LBP Activities				
19	Amount of line 17 Related to Section 504 Compliance				
20	Amount of line 17 Related to Security	100,000			
21	Amount of line 17 Related to Energy Conservation Measures				

1/ Management Improvement cost may not exceed 20% of line 17.

2/ Administrative cost may not exceed 7% of line 17 (or 9% of line 17 for PHAs/IHAs having an unusually large geographic area).

*To be completed at the end of each program.

Signature of Executive Director and Date

Signature of Field Office Manager (or Regional Administrator in co-located office) and Date

**Annual Statement/Performance
and Evaluation Report**

Part II: Supporting Pages
Comprehensive Grant Program (CGP)

**U. S. DEPARTMENT OF HOUSING
and Urban Development**
Office of Public and Indian Housing

**FYE 2000
RI 43-P003-70899**

Development Number/ Name of PHA-Wide	General Description of Proposed Work Items	Development Account Number	Estimated Cost			Funds Obligated *	Funds Expended *	Status of Proposed Work
			Original	Revised *	Difference *			
PHA-Wide Management Improvements	1	Service Coordinators	1408	75,000				
	2	Campus of Learners Implement	1408	100,000				
	3	Grant Writing	1408	10,000				
	6	Admin Salaries & Fringes	1410	150,000				
	9	Community Policing	1408	100,000				
	11	A & E Fees	1430	137,486				
	Subtotal			572,486				
RI 3-1 Morin Heights	13	Site Improvements	1450	250,000				
	14	Unit Upgrade	1460	100,000				
	15	Boiler Room Renovations	1460	150,000				
	Subtotal			500,000				
RI 3-2 Veteran's Memorial	17	Site Improvements C of L	1450	797,945				
	18	Boiler Room Renovations	1460	150,000				
	Subtotal			947,945				
RI 3-3 Parkview Manor	19	Upper Hallway Carpeting	1460	130,000				
	20	Unit Flooring Upgrade	1460	202,000				
	21	Fire Protection Upgrade Phase III	1460	30,000				
	Subtotal			362,000				
RI 3-4 Kennedy Manor	25	Fire Protection Upgrade Phase III	1460	30,000				
	23	Upper Hallway Carpeting	1460	130,000				
	Subtotal			160,000				
RI 3-5A	26	Upper Hallway Carpeting	1460	130,000				
	30	Fire Protection Upgrade Phase III	1460	30,000				
	Subtotal			160,000				
RI 3-5A St. Germain Manor	31	Upper Hallway Carpeting	1460	130,000				
	32	Fire Protection Upgrade Phase II	1460	30,000				
	Subtotal			160,000				
RI 3-7 RI 3-8 Scattered Sites		No Work Scheduled						
		Subtotal			0			
	Grand Total			2,862,431				

**Annual Statement/Performance
and Evaluation Report**

Part III: Implementation Schedule
Comprehensive Grant Program (CGP)

**U. S. DEPARTMENT OF HOUSING
and Urban Development**
Office of Public and Indian Housing

**FYE 2000
RI 43-P003-70899**

Development Number / Name	All Funds Obligated (Quarter-Ending)			Funds Expended (Quarter-Ending)			Reasons for Revised Target Dates
	Original	Revised*	Actual*	Original	Revised*	Actual*	
PHA-Wide	3/31/2001			3/31/2002			
RI 3-1 Morin Heights	3/31/2001			3/31/2002			
RI 3-2 Veterans' Memorial	3/31/2001			3/31/2002			
RI 3-3 Parkview Manor	3/31/2001			3/31/2002			
RI 3-5A Crepeau Court	3/31/2001			3/31/2002			
RI 3-6B St. Germain Manor	3/31/2001			3/31/2002			
RI 3-7 Scattered Sites	3/31/2001			3/31/2002			

* To be completed at the end of the program year

*WOONSOCKETRESIDENTADVISORYBOARD (RAB)
Ofthe WOONSOCKETHOUSINGAUTHORITY
WOONSOCKET
, RIO2895*

Evelina Champagne, President 401-766--8673

Phyllis Anderson, Secretary 401-769-8048/765-4902

September 20, 1999

Stephen v adnais,
Executive Director

Woonsocket Housing Authority
679 Social Street
Woonsocket, RIO2895

Dear Stephen:

The RAB held a meeting on August 31, 1999 and discussed the authority's language for "Clients".

We the RAB accept the authority's new language for "Clients", to say "well-being ofthe people that we serve".

◆ Thank you for your understanding in this matter
Sincerely,

Eveiina Champagn~- I/
President

WOONSOCKET RESIDENT ADVISORY BOARD

Evilina Champagne, President – (401) 766-8673

Phyllis Anderson, Secretary – (401) 769-8048

November 18, 1999

To the Board of Commissioners of the Woonsocket Housing Authority:

The Woonsocket Resident Advisory Board (WRAB) represents the tenants in public housing operated by the Woonsocket Housing Authority (WHA). The WRAB was formed just this year, in large part to participate in the development of the WHA's Five Year and One Year Plans. The WRAB appreciates the cooperation it received from WHA in receiving information about the WHA and the population served by the WHA. However, the WRAB has several concerns about the WHA's Five and One Year Plans, and cannot support those plans in their present form.

Nor can the WRAB condone the WHA's Board of Commissioners voting on the WHA's Plans immediately after the conclusion of the public hearing. Such an action would violate both the United States Housing Act as amended by Housing Quality and Work Responsibility Act (HQWRA) and HUD regulations governing the adoption of PHA plans. Both HQWRA and HUD regulations forbid the WHA from approving the Five and One Year Plans until: “(a) the PHA has conducted the public hearing; (b) the PHA has considered all public comments received on the plan; (c) **the PHA has made any changes to the plan, based on comments, after consultation with the Resident Advisory Board or other resident organization.**” (emphasis added). U.S. Housing Act of 1937 Section 5A(e)(3)(B)(3); 24 CFR 903.19. The WRAB believes that the WHA will require a period of at least ten days from the date of the public hearing to make changes to the plan based upon comments received at the hearing and to adequately consult with the WRAB about amending the present plans. The WRAB hopes that WHA will fully consider these comments and other public comments, and will meet with the WRAB before submitting the Plans to the WHA Board of Commissioners for approval.

At the outset, the WRAB notes its objection to certain terminology used in the WHA Plans. Words such as "stock" and "project" are offensive to tenants. The WRAB asks that these terms be replaced with "living units" and "family developments and high rises."

Substantive Deficiencies of WHA's Five-Year Plan

Pursuant to 42 U.S.C. §1436c-1, a PHA must develop a "statement of the mission of the public housing agency for serving the needs of low-income and very low-income families in the jurisdiction of the public housing agency...and a statement of the goals and objectives of the public housing agency that will enable the public housing agency to serve [those] needs." In response to this statutory mandate, WHA's Goals and Objectives is laudable, however it is not expansive enough.

Most distressing is WHA's omission of any goals or objectives relating to tenant participation in the Authority's planning processes. WHA should clearly establish as one of its goals and objectives the development of a positive working relationship with the WRAB and other tenant organizations to insure meaningful tenant participation in the Authority's planning processes. WHA should establish a workable city-wide tenant participation policy (including fostering the self-organization and participation of Section 8 tenants). The establishment of such a policy should be an explicit goal of the five-year plan. Furthermore, WHA should state as a goal that it will provide more resources to the WRAB. WHA's providing such resources will enable the WRAB to effectively get the word out to public housing residents and Section 8 participants at large about the WRAB's activities, what the WHA is proposing, and what the residents/participants think about the WHA proposals. HUD regulations on the PHA Plan contemplate that PHA's will provide assistance to organizations such as the WRAB: "The PHA shall allocate reasonable resources to assure the effective functioning of Resident Advisory Boards. Reasonable resources for the Resident Advisory Boards must provide reasonable means for them to be informed on programs covered by the PHA plan, to communicate in writing and by telephone with assisted families, and hold meetings with those families, and to access information regarding covered programs on the internet. . ." See 24 CFR 903.13(a)(2), 64 FR 56866 (October 21, 1999).

The WHA's 5 Year Plan does not set forth any quantitative measures to assess WHA's performance in meeting WHA's stated goals and objectives. WHA must adopt

“quantifiable” goals and objectives to meet those identified needs “wherever possible.” 24 C.F.R. §903.5. WHA is also required to state how it will address identified needs to the “maximum extent practicable.” 42 U.S.C. §1437c-1(d)(1). The goals and objectives in the Five-Year Plan fail to abide by the above legal requirements. None of the stated goals and objectives are quantifiable. The goals and objectives are stated in very general and vague terms. Moreover, the emphasis of these goals and objectives is the management and administration of the WHA, and not on the quality of life for public housing and Section 8 tenants.

WHA's stated goals and objectives have little correlation with the identified housing needs contained in the Annual Plan. For example, even though the Mission Statement identifies a desire to “. . . foster effective and creative partnerships to maximize opportunities that improve economic and personal well-being. . .”, there are no quantifiable goals and objectives which specifically address those issues. The goals and objectives must be redrafted in a way that is both quantifiable and addresses the needs identified in the Annual Plan. To the extent that success can be quantified (i.e., the number of tenants moving off welfare into work, the number of jobs created by WHA for public housing tenants, the increase in median incomes of public housing residents, the number of tenants participating in WHA-sponsored job readiness programs, etc.) the five-year plan should include these specifics.

The absence of quantifiable measures is most disturbing for the activities WHA proposes to take pursuant to Goal 1 – Providing quality, affordable, equal-opportunity housing consistent with applicant and resident needs. WHA states that redevelopment plans will be developed at Veterans Memorial and Morin Heights. WHA also proposes to provide replacement public housing or vouchers “as existing stock declines through redevelopment and conversion.” WHA should state the number of living units it plans on losing through demolition or conversion and in what developments those living units are located. Furthermore, WRAB opposes any loss of public housing living units through redevelopment, and expects the WHA to maintain the number of units in WHA’s inventory.

Substantive Deficiencies of WHA’s One-Year Plan

1. Admission and Occupancy Plan

Most of the WRAB's concerns with the WHA's One Year Plan concern the WHA's Admission and Occupancy Plan (ACOP). WRAB's comments will roughly parallel the text of WHA's ACOP.

a. Eligibility for Continued Occupancy (ACOP Section 4-1)

WHA's definition of family set forth in Section 4-1(A)(1) excludes families that are otherwise eligible for public housing and Section 8. First, there is no requirement under the U.S. Housing Act ("USHA") that family members be related by blood, marriage or operation of law. Nor does the USHA require that persons in the family have income and resources available to meet the family's needs. WHA must replace the definition of "family" in the ACOP with that found in the USHA which reads:

(B) Families._The term "families" means families with children, in the cases of elderly families, near-elderly families, and disabled families, means families whose heads (or their spouses), or whose sole members, are elderly, near-elderly, or persons with disabilities, respectively. The term includes, in the cases of elderly families, near-elderly families, and disabled families, 2 or more elderly persons, near-elderly persons, or persons with disabilities living together, and 1 or more such persons living with 1 or more persons determined under the regulations of the Secretary to be essential to their care or well-being.

42 U.S.C. Sec. 1437a(b)(3)(B)

WHA plans to deny continued occupancy to those persons who fail to meet the requirements of Subsection (A) of Section 4-1. However, the WHA may not simply deny continued occupancy and refuse to enter into a new lease with tenants at annual recertification. Under HQWRA, public housing leases must have 12 month terms. The lease must be automatically renewable except for a tenant's non-compliance with the community service requirements. See 64 Fed. Reg. 23468 (Lease Requirements) (April 30, 1999). If a tenant is no longer eligible, or has engaged in conduct that WHA deems to "represent an undesirable influence and effect upon the health, safety, and welfare of the occupants," or has a history of delinquent rent payments, WHA must commence eviction proceedings to remove the tenant for good cause.

b. Non-Discrimination (ACOP Sections 4-2(B), 4-4(A)(1))

In its proposal, the WHA states that it is “. . . bound by the nondiscrimination requirements of federal, state and local law.” This correctly states HUD’s requirement that the provisions of a PHA’s Annual Plan must not contradict state or federal law. However, the nondiscrimination policy that the WHA proposes to include in its annual plan does not comply with federal and state fair housing laws, in that discrimination on the basis of familial status and sexual orientation is not included in the WHA’s non-discrimination policy. Housing Act, 42 USC Sec. 3601 et seq. prohibits discrimination on the basis of familial status. The Rhode Island Fair Housing Practices Act prohibits discrimination on the basis of familial status and sexual orientation. R.I.G.L. 34-37-4(a).

c. Reasonable Accommodation (ACOP Section 4-2(C) and Throughout)

The “Reasonable Accommodation” section of the ACOP violates the Fair Housing Act’s provisions that require housing providers to reasonably accommodate tenants’ disabilities. The ACOP states that “. . . the Authority reserves the right to reject all requests for reasonable accommodation that do not directly mitigate or address the limitation caused by the disability or are a financial or administrative burden.” It also states that, in considering an applicant with a “behavioral history” which it determines to be “unsuitable” for housing in a WHA development, it will “. . . seek confirmation by a licensed medical practitioner that the behavioral history will not have a high likelihood of reoccurring in an environment such as WHA housing.”

The WHA must eliminate these unlawful provisions from the ACOP. The WHA may not reject a request for a reasonable accommodation because it may cause “a financial or administrative burden.” Courts interpreting the Fair Housing Act and the Rehabilitation Act of 1974, with which WHA must also comply, have stated that housing providers must grant requests for reasonable accommodation so long as such requests do not impose an **undue** financial or administrative burden. Shapiro v. Cadman Towers, Inc. 844 F. Supp. 116, 125 (E.D.N.Y. 1994); Nelson v. Thornburgh, 567 F. Supp. 369 (E.D. Pa 1983), *aff’d*, 7323 F. 2d 146 (3d Cir. 1984), *cert. Denied*, 469 U.S. 1188 (1985).

Nor can WHA require that the “reasonable accommodation” sought must directly mitigate or address the limitation caused by the disability. Instead, the “reasonable accommodation” sought must enable the person with disabilities to enjoy the housing opportunity. Congress stated in the House of Representative’s Report on Fair Housing Act Amendments of 1988 (FHAA) that the FHAA “. . . makes it *illegal to refuse to make reasonable accommodation in rules, policies, practices, or services if necessary to permit*

persons with handicaps equal opportunity to use and enjoy a dwelling. The concept of ‘reasonable accommodation’ has a long history in regulations and case law dealing with discrimination on the basis of handicap. A discriminatory rule, policy, practice or service is not defensible simply because that is the manner in which such rule or practice has traditionally been constituted. This section would require that changes be made to such traditional rules or practices if necessary to permit a person with handicaps an equal opportunity to use and enjoy a dwelling.” H.R. Rep. No. 711, 100th Cong., *reprinted in* 1988 U.S.C.C.A.N. 2173 (emphasis added).

Finally, WHA cannot deny a “reasonable accommodation” request simply because a licensed practitioner says that negative behavior may reoccur. Under the FHAA, WHA must grant a request for “reasonable accommodation” unless no reasonable accommodation will eliminate or acceptably minimize the risk of harm to other tenants. In James Roe v. Sugar River Mills Associates, MB Management Corporation, 820 F.Supp. 636 (D.N.H. 1993), the court addressed the issue of whether a federally subsidized housing complex discriminated against a tenant who suffered from mental illness when it threatened to evict him for conduct related to his handicap and allegedly failed to make “reasonable accommodations” necessary to afford him an opportunity to use and enjoy an apartment at the complex. The court held that “. . . the Act requires defendants to demonstrate that no ‘reasonable accommodation’ will eliminate or acceptably minimize the risk he poses to other residents” before the landlord could evict the tenant. *Id.* at 640

d. Inquiries Concerning Blood Poisoned Children (ACOP Section 4-3(A)(4))

The WHA proposes that applicants to public housing disclose to WHA whether their children have elevated blood lead levels. WHA has no legitimate reason for making this inquiry since all WHA housing must be “lead safe.” The WRAB is concerned that such a requirement would deter families with lead poisoned children from applying and moving into public housing, and that such an inquiry is an invasion of privacy. Moreover, such an inquiry is barred by fair housing laws that generally prohibit inquiries on the nature of a person’s handicap. HUD’s regulations implementing the Fair Housing Act prohibit inquiries that seek to determine whether an applicant is disabled, and inquiries into the nature of or severity of an applicant’s disability. 24 C.F.R. §100.202(c).

e. Policy on Applicant Evaluation (ACOP Section 4-3(D))

i. Failure to Consider Mitigating Factors

The WHA's proposed policy on evaluating applicants for admission fail to include any provisions regarding the consideration of mitigating factors or evidence of rehabilitation when evaluating applicants. Federal law and HUD regulations require the WHA to evaluate such information before rejecting applicants.

As to consideration of mitigating factors, 24 CFR 960.205(d) states that, "In the event of the receipt of unfavorable information with respect to an applicant, consideration shall be given to the time, nature, and extent of the applicant's conduct and to factors which might indicate a reasonable probability of favorable future conduct or financial prospects." Factors which the PHA must consider include: "(1) Evidence of rehabilitation; (2) Evidence of the applicant family's participation in or willingness to participate in social service or other appropriate counseling service programs and the availability of such programs; (3) Evidence of the applicant family's willingness to attempt to increase family income and the availability of training or employment programs in the locality." See 24 CFR 960.205(d)(1)-(3). This language needs to be added to Section 4-1 of the WHA's Admission and Occupancy Policies (ACOP).

ii. Denials based on criminal activity.

WHA's policy for denying applicants with criminal records as set forth in ACOP Section 4-3(D) goes far beyond what Congress has prescribed for such applicants. For example, 42 U.S.C. §13661(c) provides that a household shall be prohibited from admission to federally assisted housing if any member of the household has engaged in a prohibited criminal activity "during a *reasonable time* preceding the date when the applicant household would otherwise be selected for admission." (Emphasis added.) Congress has fixed the period of ineligibility for those evicted from federally assisted housing for drug-crime and violent crime at 3 years. 42 U.S.C. §13661(a). Since drug-related and violent crimes are more serious than other forms of criminal activity, a "reasonable" ban on admission would be a period of time that is less than 3 years. Thus, the WHA must amend this provision of policy on admissions and occupancy to bar admission to only those households who have engaged in criminal activity during a period no longer than 3 years prior to the date of application for housing.

iii. Denials based on substance abuse.

Section 4-3(d)(3) of the ACOP does not accurately reflect the standard for denying applicants on grounds of substance abuse. Those standards are set out at 42

U.S.C. §13661(b), and provides that a PHA may prohibit admission to any household that:

- 1) the public housing agency determines is illegally using a controlled substance;
or
- 2) the public housing agency determines it has reasonable cause to believe that such household member's illegal use (or pattern of illegal use) of a controlled substance, or abuse (or pattern of abuse) of alcohol, *may interfere with the health, safety, or right to peaceful enjoyment of the premises by other residents.*" (Emphasis added.)

The language in the ACOP goes beyond this language and the WRAB proposes that the language in ACOP Sections 4-3(D)(3) (c)-(e) be deleted and replaced with the language above.

Second, the ACOP should explicitly state that a denial for substance abuse be grounded with a nexus between the applicant's behavior and its potential effect on other residents. Accordingly, if an applicant's history of substance abuse or abuse of alcohol comes to the attention of the WHA, the WHA must determine whether it has reasonable cause to believe that such use or abuse "may interfere with the health, safety, or right to peaceful enjoyment of the premises by other residents of the project." In making this determination, "interference" may not be presumed merely from the history of alcohol or drug use, but must be demonstrated by the applicant's behavior, such as verifiable negative reports from a prior landlord or neighbor. Moreover, the US Housing act requires WHA to consider evidence of rehabilitation as part of its decision to admit or deny an applicant with a family member who has a history of substance abuse. Specifically, WHA must take into consideration whether the applicant or family member has:

- 1) has successfully completed a supervised drug or alcohol rehabilitation program (as applicable) and is no longer engaging in the illegal use of a controlled substance or abuse of alcohol (as applicable);
- 2) has otherwise been rehabilitated successfully and is no longer engaging in the illegal use of a controlled substance or abuse of alcohol (as applicable)
or

- 3) is participating in a supervised drug treatment program or alcohol rehabilitation program (as applicable) and is no longer engaging in the illegal use of a controlled substance or abuse of alcohol (as applicable).

42 USC §13661(b)(2) (A-C)

The WRAB proposes that the above language be incorporated into ACOP Section 4-3(D)(3). The WRAB also points out that these same standards apply to decisions to eviction of tenants with substance abuse problems.

iv. Investigation of substance abuse.

While the Plan indicates that the WHA will rely upon sources of information which may include clinics and physicians, the Plan does not indicate the procedure by which WHA staff will access these sources of information. Because access to records held by treatment facilities is governed by numerous federal and state statutes, the WHA should include a more detailed description of the procedures by which WHA staff will access such information. WHA should take note of the procedures and limitations on inquiries relating to drug treatment set forth in 42 USC §1437(d)(u).

v. Fingerprinting Applicants

The WRAB is opposed to the fingerprinting of applicants as is proposed by the WHA in Section 4-3D(7) of the ACOP. HUD has not authorized the use of fingerprints as a source of information and the WRAB believes that it is an unlawful, demeaning, and stigmatizing manner for WHA to obtain information on an applicant. Moreover, Congress has authorized PHA's to obtain information on an applicant's criminal record from other sources, and has made available federal criminal databases to assist PHA's obtain information on an applicant's criminal record. Thus, WHA has no reason to require applicants to be fingerprinted.

vi. Foster Children

The WRAB has concerns regarding WHA's policies on admitting families with foster children. Sometimes foster children are placed into the custody of persons that are not licensed by DCYF as foster parents. Thus, WRAB proposes that WHA also admit applicants where the Family Court has placed a foster child, even if DCYF has not licensed the foster parent, and make the appropriate change in ACOP Section 4-3(I)(1). Moreover, ACOP Section 4-3(I)(4) as presently drafted makes no sense. If WHA seeks to deny "remaining family member status" for bad faith representation of foster parent status, it should clearly do so.

e. Selection of Tenants (ACOP Section 4-4)

i. Fair Housing Concerns

Two provisions of the ACOP relating to tenant selection violate the Fair Housing Act's prohibition against discrimination on the basis of handicap. Section 4-4B(1) of the ACOP states that an applicant, ". . . must be capable of complying with all obligations of occupancy either with *or without supportive services*." (emphasis added). ACOP Section 4-4B(2) states that WHA ". . . will deny admission to any applicant it believes would be unable to manage a household or comply with the lease." The WHA must omit these two unlawful provisions of the ACOP. In Cason v. Rochester Housing Authority, 748 F.Supp. 1002 (W.D.N.Y. 1990), the court held that certain procedures utilized by the Rochester Housing Authority to select tenants were in clear violation of federal law because they had the effect of discriminating against handicapped applicants. Id. at 1011. The court specified that the ". . . portion of the Authority's manual entitled 'Standards for Tenant Selection Criteria' that requires an applicant to demonstrate an ability "to live independently" violates federal statutes and is contrary to federal regulations concerning discrimination in housing and must not be utilized in the tenant selection process." Id. at 1011. These two provisions of the ACOP clearly have a discriminatory impact on handicapped tenants and must be deleted.

ii. Selection and Assignment of Tenants

The WRAB opposes the three-day response time from the date the notice is mailed by which applicants must accept or reject a unit (ACOP Section 4-4(F)(1)(b)). The WRAB proposes that this period be extended to 10 days, because in many cases 3 days is not enough time for an applicant to receive the notice. The WRAB also believes that applicants to family developments be given the opportunity to reject three offers of a unit in the manner that applicants to elderly housing have.

e. Transfers (ACOP Section 4-5)

The WRAB believes that WHA should not make any distinction between the rate of implementing management initiated transfers and resident initiated transfers, as set forth in ACOP Section 4-5 (B). The WRAB also believes that transfers based on a "reasonable accommodation" should be considered an administrative transfer, not just transfers based on "[c]ompelling and documented medical impairment that is expected to be permanent or of long and indefinite duration and which could be substantially improved by a transfer to another unit." Finally, WRAB believes that WHA should consider as a

“reasonable accommodation:” the payment for packing services where WHA requires a disabled tenant to move, instead of refusing outright to pay for packing services.

f. Annual Examination and interim rent adjustments (ACOP Section 4-7)

The WRAB objects to WHA retaining the sole discretion over whether to enter into repayment agreements for tenants that are found to have been paying lower rents than they should have paid as a result of the completion of the rent recertification process. The WRAB proposes that WHA only decline to enter into repayment agreements if the tenant has clearly engaged in deliberate and intentional deceit in submitting false, incomplete or inaccurate information on household income. The WRAB proposes that WHA incorporate the provisions of HUD Handbook 4350.3, Section 5-19, to use as a standard for determining whether a tenant’s actions were fraudulent or deceitful.

The ACOP also requires tenants to report any increase in their income within ten days, while the Annual Plan (page 30) states that tenants need only report increases in excess of \$100/month. The WRAB urges WHA to follow the reporting requirement set out in the Annual Plan and to amend the ACOP to be consistent with the Annual Plan. Such a rule will enable households that start earning more money to keep a larger part of their earnings, thus increasing the likelihood of achieving economic self-sufficiency.

i. Treatment of Income Changes Resulting From Welfare Program Requirements (ACOP Section 4-7(D))

It is the recommendation of the Woonsocket RAB to the Woonsocket Housing Authority (WHA) and its Board of Commissioners to include the following Language in ACOP Section 4-7(D):

Families whose welfare assistance is reduced specifically because of welfare fraud, or failure to comply with a work requirement specified in a completed and signed Family Independence Plan (FIP Plan) shall not have the rent reduced based on the welfare benefit reduction.

The WHA shall obtain third party verification from the welfare agency before denying the family's request for a rent reduction.

The WHA shall reduce the rents of welfare recipients who lose their benefits due to time limits, but have complied with all requirements and still cannot

obtain a job. This policy applies only in welfare sanction situations and not when benefits are reduced or terminated due to time limits. Further, it does not apply when benefits are reduced due to sanctions for failure to comply with a behavioral condition of the program other than one related to the parent's economic self-sufficiency. That is, if a family fails to comply with such matters as paternity establishment, learnfare or immunization/shotfare requirements and suffers a benefit reduction as a result, its rent must still be reduced under the usual income-based rent rules.

The WHA staff shall offer assistance to recipients/residents of FIP cash assistance in meeting the work requirement under the FIP rules.

The WHA shall ensure coordination between DHS and WHA of programs available to enhance recipients'/residents' employability.

The WHA shall inform the family in writing within 10 days upon receipt of the returned and completed verification form of the denial to perform an interim adjustment. The Authority shall inform the family that it is entitled to request an informal hearing in accordance with 24 CFR 982.555 (a)(1).

j. Determination of Annual Income (ACOP Section 4-8)

The ACOP does not incorporate the mandatory earned income exclusion set forth in 42 USC Section 1437a(d) for recently re-employed households, for families with increased earnings due to participating in family-self sufficiency programs, job training programs, and for welfare recipients who experience increased income. WHA needs to add this exclusion to ACOP Section 4-8. WHA should also consult with the WRAB and determine whether any additional earned income exclusions should be added to the ACOP.

k. Evictions (ACOP Section 4-11)

WHA incorrectly states that termination of tenancy is mandatory for certain lease violations involving the use of controlled substances or alcohol. The US Housing Act provides that leases include provisions for eviction of tenants for certain offenses involving drug and alcohol abuse, but that is not the same as mandating the eviction of every tenant who has a substance abuse issue. Again, WHA is required to look at evidence of

rehabilitation (as noted above, pages 11-12). Moreover, for evictions involving criminal activity, 24 CFR 966.(k)(5) the PHA has the discretion to consider all the circumstances before making a decision to evict:

In deciding to evict for criminal activity, the PHA shall have discretion to consider all of the circumstances of the case, including the seriousness of the offense, the extent of participation by family members, and the effects that the eviction would have on family members not involved in the proscribed activity. In appropriate cases, the PHA may permit continued occupancy by remaining family members and may impose a condition that family members who engaged in the proscribed activity will not reside in the unit. A PHA may require a family member who has engaged in the illegal use of drugs to present evidence of successful completion of a treatment program as a condition to being allowed to reside in the unit.

This language should be added to the ACOP.

2. Adding Tenant Members to WHA Board of Commissioners

Presently, there are no tenant members on the WHA Board of Commissioners and the WHA has no plan to add tenants to the WHA Board. Federal law requires the WHA Board to have tenant members. It is the recommendation of the WRAB to WHA and its Board of Commissioners that the Annual Plan contain a statement indicating that there be two or more tenant commissioners elected by public housing residents, who should be occupants of public housing. The elections should be held in such a way so as to provide a fair opportunity for all public housing residents, as well as Section 8 certificate holders, to be given an opportunity to vote.

NOTE: Federal regulations require resident board members. See final rule; Federal Register/vol. 64, no. 203/Thursday, October 21, 1999/Rules and Regulations, 24 CFR Part 964.420. This mandate was imposed by HQWRA and was effective on October 1, 1999.

3. Income Targeting/ Deconcentration

The WHA should retain its targeting of public housing resources for the very low-income, and for those with the greatest relative housing need. The WRAB does not favor systems which would allow applicants with little or no relative housing need, but with

relatively high incomes, to “skip over” persons who have been on the waiting list for a longer period of time and who have greater housing needs. The WHA should concentrate its economic diversity efforts on trying to upgrade the incomes of persons already living in its public housing developments, and provide incentives for working families who improve their situation while in public housing to remain in public housing. By assisting lower-income residents to become higher-income residents, the WHA will have been successful in its mission to deconcentrate poverty. WHA should offer incentives to lower-income residents which include giving priority to Section 3 training slots, providing escrow savings accounts, creating additional exclusions to earned income, providing after school programs, child care facilities, transportation services, and training opportunities. If the WHA is to meaningfully engage in a program of deconcentration, these incentives must be made available to current lower-income tenants.

The WHA’s deconcentration plan *does not include one single concrete plan* for how to help its lower-income tenants move into higher income neighborhoods. WHA should explore the creation of a mobility program to enable Section 8 voucher holders find housing in higher income census tracts.

Respectfully Submitted:

Woonsocket Residents Advisory Board

By:

_____	_____
_____	_____
_____	_____
_____	_____



Woonsocket Housing Authority

679 Social Street • Woonsocket, Rhode Island 02895-2090

Board of Commissioners
Woonsocket Housing Authority
C/O 679 Social Street
Woonsocket, RI 02895

November 18, 1999

Dear Members of the Board,

Based on comments received by my office after the initial submission of the Annual Plan, I am respectfully submitting the following recommendations for changes to the Housing Authority's Agency Plan.

Recommendation #1: Adoption of a Homeless Preference

... that the previous federal homeless preference be added to the list of other local preferences to be adopted by this agency. This is based on comments received by a Family Resources / WSCAP caseworker, as well as Chairperson of the WHA Board of Commissioners, Mary Landreville and staff member, Rhonda R. Mitchell.

Recommendation #2: Additional Income Exclusions for Alimony and Child Support Payments

... that QHWRA '98 discretionary income exclusions regarding alimony payments paid out at a maximum of \$550/yr and child support payments paid out for a maximum of \$480/yr be disregarded in calculating annual income. This is based on comments received by staff members, Patricia Keefe, MaryAnn Jolicoeur, Rita Ornstedt, and Rhonda R. Mitchell.

Recommendation #3: Section 8 Home Ownership Program

... that the WHA implement a Section 8 Home Ownership Program. This is based on comments received by WHA Executive Director, Stephen A. Vadnais.

Respectfully yours,



Stephen A. Vadnais, Executive Director

Tel.: 401-767-8000 • Fax 401-767-8088 • E-mail: WoonHA@aol.com • TDD: 1-800-745-6575

Commissioners: Mary F. Landreville, *Chairwoman* • John J. Kennedy, Jr., *Vice Chairman*
Albert G. Brien • Constance M. Laprade • John Notarangelo
Stephen A. Vadnais, *Executive Director*

*WOONSOCKETRESIDENTADVISORYBOARD (RAB)
Ofthe WOONSOCKETHOUSINGAUTHORITY
WOONSOCKET
, RIO2895*

Evelina Champagne, President 401-766--8673

Phyllis Anderson, Secretary 401-769-8048/765-4902

September 20, 1999

Stephen v adnais,
Executive Director

W oonsocket Housing Authority
679 Social Street
Woonsocket, RIO2895

Dear Stephen:

The RAB held a meeting on August 31, 1999 and discussed the authority's language for "Clients".

We the RAB accept the authority's new language for "Clients", to say "well-being ofthe people that we serve".

◆ Thank you for your understanding in this matter
Sincerely,

Eveiina Champagn~- I/
President

WOONSOCKET RESIDENT ADVISORY BOARD

Evilina Champagne, President – (401) 766-8673

Phyllis Anderson, Secretary – (401) 769-8048

November 18, 1999

To the Board of Commissioners of the Woonsocket Housing Authority:

The Woonsocket Resident Advisory Board (WRAB) represents the tenants in public housing operated by the Woonsocket Housing Authority (WHA). The WRAB was formed just this year, in large part to participate in the development of the WHA's Five Year and One Year Plans. The WRAB appreciates the cooperation it received from WHA in receiving information about the WHA and the population served by the WHA. However, the WRAB has several concerns about the WHA's Five and One Year Plans, and cannot support those plans in their present form.

Nor can the WRAB condone the WHA's Board of Commissioners voting on the WHA's Plans immediately after the conclusion of the public hearing. Such an action would violate both the United States Housing Act as amended by Housing Quality and Work Responsibility Act (HQWRA) and HUD regulations governing the adoption of PHA plans. Both HQWRA and HUD regulations forbid the WHA from approving the Five and One Year Plans until: “(a) the PHA has conducted the public hearing; (b) the PHA has considered all public comments received on the plan; (c) **the PHA has made any changes to the plan, based on comments, after consultation with the Resident Advisory Board or other resident organization.**” (emphasis added). U.S. Housing Act of 1937 Section 5A(e)(3)(B)(3); 24 CFR 903.19. The WRAB believes that the WHA will require a period of at least ten days from the date of the public hearing to make changes to the plan based upon comments received at the hearing and to adequately consult with the WRAB about amending the present plans. The WRAB hopes that WHA will fully consider these comments and other public comments, and will meet with the WRAB before submitting the Plans to the WHA Board of Commissioners for approval.

At the outset, the WRAB notes its objection to certain terminology used in the WHA Plans. Words such as "stock" and "project" are offensive to tenants. The WRAB asks that these terms be replaced with "living units" and "family developments and high rises."

Substantive Deficiencies of WHA's Five-Year Plan

Pursuant to 42 U.S.C. §1436c-1, a PHA must develop a "statement of the mission of the public housing agency for serving the needs of low-income and very low-income families in the jurisdiction of the public housing agency...and a statement of the goals and objectives of the public housing agency that will enable the public housing agency to serve [those] needs." In response to this statutory mandate, WHA's Goals and Objectives is laudable, however it is not expansive enough.

Most distressing is WHA's omission of any goals or objectives relating to tenant participation in the Authority's planning processes. WHA should clearly establish as one of its goals and objectives the development of a positive working relationship with the WRAB and other tenant organizations to insure meaningful tenant participation in the Authority's planning processes. WHA should establish a workable city-wide tenant participation policy (including fostering the self-organization and participation of Section 8 tenants). The establishment of such a policy should be an explicit goal of the five-year plan. Furthermore, WHA should state as a goal that it will provide more resources to the WRAB. WHA's providing such resources will enable the WRAB to effectively get the word out to public housing residents and Section 8 participants at large about the WRAB's activities, what the WHA is proposing, and what the residents/participants think about the WHA proposals. HUD regulations on the PHA Plan contemplate that PHA's will provide assistance to organizations such as the WRAB: "The PHA shall allocate reasonable resources to assure the effective functioning of Resident Advisory Boards. Reasonable resources for the Resident Advisory Boards must provide reasonable means for them to be informed on programs covered by the PHA plan, to communicate in writing and by telephone with assisted families, and hold meetings with those families, and to access information regarding covered programs on the internet. . ." See 24 CFR 903.13(a)(2), 64 FR 56866 (October 21, 1999).

The WHA's 5 Year Plan does not set forth any quantitative measures to assess WHA's performance in meeting WHA's stated goals and objectives. WHA must adopt

“quantifiable” goals and objectives to meet those identified needs “wherever possible.” 24 C.F.R. §903.5. WHA is also required to state how it will address identified needs to the “maximum extent practicable.” 42 U.S.C. §1437c-1(d)(1). The goals and objectives in the Five-Year Plan fail to abide by the above legal requirements. None of the stated goals and objectives are quantifiable. The goals and objectives are stated in very general and vague terms. Moreover, the emphasis of these goals and objectives is the management and administration of the WHA, and not on the quality of life for public housing and Section 8 tenants.

WHA's stated goals and objectives have little correlation with the identified housing needs contained in the Annual Plan. For example, even though the Mission Statement identifies a desire to “. . . foster effective and creative partnerships to maximize opportunities that improve economic and personal well-being. . .”, there are no quantifiable goals and objectives which specifically address those issues. The goals and objectives must be redrafted in a way that is both quantifiable and addresses the needs identified in the Annual Plan. To the extent that success can be quantified (i.e., the number of tenants moving off welfare into work, the number of jobs created by WHA for public housing tenants, the increase in median incomes of public housing residents, the number of tenants participating in WHA-sponsored job readiness programs, etc.) the five-year plan should include these specifics.

The absence of quantifiable measures is most disturbing for the activities WHA proposes to take pursuant to Goal 1 – Providing quality, affordable, equal-opportunity housing consistent with applicant and resident needs. WHA states that redevelopment plans will be developed at Veterans Memorial and Morin Heights. WHA also proposes to provide replacement public housing or vouchers “as existing stock declines through redevelopment and conversion.” WHA should state the number of living units it plans on losing through demolition or conversion and in what developments those living units are located. Furthermore, WRAB opposes any loss of public housing living units through redevelopment, and expects the WHA to maintain the number of units in WHA’s inventory.

Substantive Deficiencies of WHA’s One-Year Plan

1. Admission and Occupancy Plan

Most of the WRAB's concerns with the WHA's One Year Plan concern the WHA's Admission and Occupancy Plan (ACOP). WRAB's comments will roughly parallel the text of WHA's ACOP.

a. Eligibility for Continued Occupancy (ACOP Section 4-1)

WHA's definition of family set forth in Section 4-1(A)(1) excludes families that are otherwise eligible for public housing and Section 8. First, there is no requirement under the U.S. Housing Act ("USHA") that family members be related by blood, marriage or operation of law. Nor does the USHA require that persons in the family have income and resources available to meet the family's needs. WHA must replace the definition of "family" in the ACOP with that found in the USHA which reads:

(B) Families._The term "families" means families with children, in the cases of elderly families, near-elderly families, and disabled families, means families whose heads (or their spouses), or whose sole members, are elderly, near-elderly, or persons with disabilities, respectively. The term includes, in the cases of elderly families, near-elderly families, and disabled families, 2 or more elderly persons, near-elderly persons, or persons with disabilities living together, and 1 or more such persons living with 1 or more persons determined under the regulations of the Secretary to be essential to their care or well-being.

42 U.S.C. Sec. 1437a(b)(3)(B)

WHA plans to deny continued occupancy to those persons who fail to meet the requirements of Subsection (A) of Section 4-1. However, the WHA may not simply deny continued occupancy and refuse to enter into a new lease with tenants at annual recertification. Under HQWRA, public housing leases must have 12 month terms. The lease must be automatically renewable except for a tenant's non-compliance with the community service requirements. See 64 Fed. Reg. 23468 (Lease Requirements) (April 30, 1999). If a tenant is no longer eligible, or has engaged in conduct that WHA deems to "represent an undesirable influence and effect upon the health, safety, and welfare of the occupants," or has a history of delinquent rent payments, WHA must commence eviction proceedings to remove the tenant for good cause.

b. Non-Discrimination (ACOP Sections 4-2(B), 4-4(A)(1))

In its proposal, the WHA states that it is “. . . bound by the nondiscrimination requirements of federal, state and local law.” This correctly states HUD’s requirement that the provisions of a PHA’s Annual Plan must not contradict state or federal law. However, the nondiscrimination policy that the WHA proposes to include in its annual plan does not comply with federal and state fair housing laws, in that discrimination on the basis of familial status and sexual orientation is not included in the WHA’s non-discrimination policy. Housing Act, 42 USC Sec. 3601 et seq. prohibits discrimination on the basis of familial status. The Rhode Island Fair Housing Practices Act prohibits discrimination on the basis of familial status and sexual orientation. R.I.G.L. 34-37-4(a).

c. Reasonable Accommodation (ACOP Section 4-2(C) and Throughout)

The “Reasonable Accommodation” section of the ACOP violates the Fair Housing Act’s provisions that require housing providers to reasonably accommodate tenants’ disabilities. The ACOP states that “. . . the Authority reserves the right to reject all requests for reasonable accommodation that do not directly mitigate or address the limitation caused by the disability or are a financial or administrative burden.” It also states that, in considering an applicant with a “behavioral history” which it determines to be “unsuitable” for housing in a WHA development, it will “. . . seek confirmation by a licensed medical practitioner that the behavioral history will not have a high likelihood of reoccurring in an environment such as WHA housing.”

The WHA must eliminate these unlawful provisions from the ACOP. The WHA may not reject a request for a reasonable accommodation because it may cause “a financial or administrative burden.” Courts interpreting the Fair Housing Act and the Rehabilitation Act of 1974, with which WHA must also comply, have stated that housing providers must grant requests for reasonable accommodation so long as such requests do not impose an **undue** financial or administrative burden. Shapiro v. Cadman Towers, Inc. 844 F. Supp. 116, 125 (E.D.N.Y. 1994); Nelson v. Thornburgh, 567 F. Supp. 369 (E.D. Pa 1983), *aff’d*, 7323 F. 2d 146 (3d Cir. 1984), *cert. Denied*, 469 U.S. 1188 (1985).

Nor can WHA require that the “reasonable accommodation” sought must directly mitigate or address the limitation caused by the disability. Instead, the “reasonable accommodation” sought must enable the person with disabilities to enjoy the housing opportunity. Congress stated in the House of Representative’s Report on Fair Housing Act Amendments of 1988 (FHAA) that the FHAA “. . . makes it *illegal to refuse to make reasonable accommodation in rules, policies, practices, or services if necessary to permit*

persons with handicaps equal opportunity to use and enjoy a dwelling. The concept of ‘reasonable accommodation’ has a long history in regulations and case law dealing with discrimination on the basis of handicap. A discriminatory rule, policy, practice or service is not defensible simply because that is the manner in which such rule or practice has traditionally been constituted. This section would require that changes be made to such traditional rules or practices if necessary to permit a person with handicaps an equal opportunity to use and enjoy a dwelling.” H.R. Rep. No. 711, 100th Cong., *reprinted in* 1988 U.S.C.C.A.N. 2173 (emphasis added).

Finally, WHA cannot deny a “reasonable accommodation” request simply because a licensed practitioner says that negative behavior may reoccur. Under the FHAA, WHA must grant a request for “reasonable accommodation” unless no reasonable accommodation will eliminate or acceptably minimize the risk of harm to other tenants. In James Roe v. Sugar River Mills Associates, MB Management Corporation, 820 F.Supp. 636 (D.N.H. 1993), the court addressed the issue of whether a federally subsidized housing complex discriminated against a tenant who suffered from mental illness when it threatened to evict him for conduct related to his handicap and allegedly failed to make “reasonable accommodations” necessary to afford him an opportunity to use and enjoy an apartment at the complex. The court held that “. . . the Act requires defendants to demonstrate that no ‘reasonable accommodation’ will eliminate or acceptably minimize the risk he poses to other residents” before the landlord could evict the tenant. *Id.* at 640

d. Inquiries Concerning Blood Poisoned Children (ACOP Section 4-3(A)(4))

The WHA proposes that applicants to public housing disclose to WHA whether their children have elevated blood lead levels. WHA has no legitimate reason for making this inquiry since all WHA housing must be “lead safe.” The WRAB is concerned that such a requirement would deter families with lead poisoned children from applying and moving into public housing, and that such an inquiry is an invasion of privacy. Moreover, such an inquiry is barred by fair housing laws that generally prohibit inquiries on the nature of a person’s handicap. HUD’s regulations implementing the Fair Housing Act prohibit inquiries that seek to determine whether an applicant is disabled, and inquiries into the nature of or severity of an applicant’s disability. 24 C.F.R. §100.202(c).

e. Policy on Applicant Evaluation (ACOP Section 4-3(D))

i. Failure to Consider Mitigating Factors

The WHA's proposed policy on evaluating applicants for admission fail to include any provisions regarding the consideration of mitigating factors or evidence of rehabilitation when evaluating applicants. Federal law and HUD regulations require the WHA to evaluate such information before rejecting applicants.

As to consideration of mitigating factors, 24 CFR 960.205(d) states that, "In the event of the receipt of unfavorable information with respect to an applicant, consideration shall be given to the time, nature, and extent of the applicant's conduct and to factors which might indicate a reasonable probability of favorable future conduct or financial prospects." Factors which the PHA must consider include: "(1) Evidence of rehabilitation; (2) Evidence of the applicant family's participation in or willingness to participate in social service or other appropriate counseling service programs and the availability of such programs; (3) Evidence of the applicant family's willingness to attempt to increase family income and the availability of training or employment programs in the locality." See 24 CFR 960.205(d)(1)-(3). This language needs to be added to Section 4-1 of the WHA's Admission and Occupancy Policies (ACOP).

ii. Denials based on criminal activity.

WHA's policy for denying applicants with criminal records as set forth in ACOP Section 4-3(D) goes far beyond what Congress has prescribed for such applicants. For example, 42 U.S.C. §13661(c) provides that a household shall be prohibited from admission to federally assisted housing if any member of the household has engaged in a prohibited criminal activity "during a *reasonable time* preceding the date when the applicant household would otherwise be selected for admission." (Emphasis added.) Congress has fixed the period of ineligibility for those evicted from federally assisted housing for drug-crime and violent crime at 3 years. 42 U.S.C. §13661(a). Since drug-related and violent crimes are more serious than other forms of criminal activity, a "reasonable" ban on admission would be a period of time that is less than 3 years. Thus, the WHA must amend this provision of policy on admissions and occupancy to bar admission to only those households who have engaged in criminal activity during a period no longer than 3 years prior to the date of application for housing.

iii. Denials based on substance abuse.

Section 4-3(d)(3) of the ACOP does not accurately reflect the standard for denying applicants on grounds of substance abuse. Those standards are set out at 42

U.S.C. §13661(b), and provides that a PHA may prohibit admission to any household that:

- 1) the public housing agency determines is illegally using a controlled substance;
or
- 2) the public housing agency determines it has reasonable cause to believe that such household member's illegal use (or pattern of illegal use) of a controlled substance, or abuse (or pattern of abuse) of alcohol, *may interfere with the health, safety, or right to peaceful enjoyment of the premises by other residents.*" (Emphasis added.)

The language in the ACOP goes beyond this language and the WRAB proposes that the language in ACOP Sections 4-3(D)(3) (c)-(e) be deleted and replaced with the language above.

Second, the ACOP should explicitly state that a denial for substance abuse be grounded with a nexus between the applicant's behavior and its potential effect on other residents. Accordingly, if an applicant's history of substance abuse or abuse of alcohol comes to the attention of the WHA, the WHA must determine whether it has reasonable cause to believe that such use or abuse "may interfere with the health, safety, or right to peaceful enjoyment of the premises by other residents of the project." In making this determination, "interference" may not be presumed merely from the history of alcohol or drug use, but must be demonstrated by the applicant's behavior, such as verifiable negative reports from a prior landlord or neighbor. Moreover, the US Housing act requires WHA to consider evidence of rehabilitation as part of its decision to admit or deny an applicant with a family member who has a history of substance abuse. Specifically, WHA must take into consideration whether the applicant or family member has:

- 1) has successfully completed a supervised drug or alcohol rehabilitation program (as applicable) and is no longer engaging in the illegal use of a controlled substance or abuse of alcohol (as applicable);
- 2) has otherwise been rehabilitated successfully and is no longer engaging in the illegal use of a controlled substance or abuse of alcohol (as applicable)
or

- 3) is participating in a supervised drug treatment program or alcohol rehabilitation program (as applicable) and is no longer engaging in the illegal use of a controlled substance or abuse of alcohol (as applicable).

42 USC §13661(b)(2) (A-C)

The WRAB proposes that the above language be incorporated into ACOP Section 4-3(D)(3). The WRAB also points out that these same standards apply to decisions to eviction of tenants with substance abuse problems.

iv. Investigation of substance abuse.

While the Plan indicates that the WHA will rely upon sources of information which may include clinics and physicians, the Plan does not indicate the procedure by which WHA staff will access these sources of information. Because access to records held by treatment facilities is governed by numerous federal and state statutes, the WHA should include a more detailed description of the procedures by which WHA staff will access such information. WHA should take note of the procedures and limitations on inquiries relating to drug treatment set forth in 42 USC §1437(d)(u).

v. Fingerprinting Applicants

The WRAB is opposed to the fingerprinting of applicants as is proposed by the WHA in Section 4-3D(7) of the ACOP. HUD has not authorized the use of fingerprints as a source of information and the WRAB believes that it is an unlawful, demeaning, and stigmatizing manner for WHA to obtain information on an applicant. Moreover, Congress has authorized PHA's to obtain information on an applicant's criminal record from other sources, and has made available federal criminal databases to assist PHA's obtain information on an applicant's criminal record. Thus, WHA has no reason to require applicants to be fingerprinted.

vi. Foster Children

The WRAB has concerns regarding WHA's policies on admitting families with foster children. Sometimes foster children are placed into the custody of persons that are not licensed by DCYF as foster parents. Thus, WRAB proposes that WHA also admit applicants where the Family Court has placed a foster child, even if DCYF has not licensed the foster parent, and make the appropriate change in ACOP Section 4-3(I)(1). Moreover, ACOP Section 4-3(I)(4) as presently drafted makes no sense. If WHA seeks to deny "remaining family member status" for bad faith representation of foster parent status, it should clearly do so.

e. Selection of Tenants (ACOP Section 4-4)

i. Fair Housing Concerns

Two provisions of the ACOP relating to tenant selection violate the Fair Housing Act's prohibition against discrimination on the basis of handicap. Section 4-4B(1) of the ACOP states that an applicant, ". . . must be capable of complying with all obligations of occupancy either with *or without supportive services.*" (emphasis added). ACOP Section 4-4B(2) states that WHA ". . . will deny admission to any applicant it believes would be unable to manage a household or comply with the lease." The WHA must omit these two unlawful provisions of the ACOP. In Cason v. Rochester Housing Authority, 748 F.Supp. 1002 (W.D.N.Y. 1990), the court held that certain procedures utilized by the Rochester Housing Authority to select tenants were in clear violation of federal law because they had the effect of discriminating against handicapped applicants. Id. at 1011. The court specified that the ". . . portion of the Authority's manual entitled 'Standards for Tenant Selection Criteria' that requires an applicant to demonstrate an ability "to live independently" violates federal statutes and is contrary to federal regulations concerning discrimination in housing and must not be utilized in the tenant selection process." Id. at 1011. These two provisions of the ACOP clearly have a discriminatory impact on handicapped tenants and must be deleted.

ii. Selection and Assignment of Tenants

The WRAB opposes the three-day response time from the date the notice is mailed by which applicants must accept or reject a unit (ACOP Section 4-4(F)(1)(b)). The WRAB proposes that this period be extended to 10 days, because in many cases 3 days is not enough time for an applicant to receive the notice. The WRAB also believes that applicants to family developments be given the opportunity to reject three offers of a unit in the manner that applicants to elderly housing have.

e. Transfers (ACOP Section 4-5)

The WRAB believes that WHA should not make any distinction between the rate of implementing management initiated transfers and resident initiated transfers, as set forth in ACOP Section 4-5 (B). The WRAB also believes that transfers based on a "reasonable accommodation" should be considered an administrative transfer, not just transfers based on "[c]ompelling and documented medical impairment that is expected to be permanent or of long and indefinite duration and which could be substantially improved by a transfer to another unit." Finally, WRAB believes that WHA should consider as a

“reasonable accommodation:” the payment for packing services where WHA requires a disabled tenant to move, instead of refusing outright to pay for packing services.

f. Annual Examination and interim rent adjustments (ACOP Section 4-7)

The WRAB objects to WHA retaining the sole discretion over whether to enter into repayment agreements for tenants that are found to have been paying lower rents than they should have paid as a result of the completion of the rent recertification process. The WRAB proposes that WHA only decline to enter into repayment agreements if the tenant has clearly engaged in deliberate and intentional deceit in submitting false, incomplete or inaccurate information on household income. The WRAB proposes that WHA incorporate the provisions of HUD Handbook 4350.3, Section 5-19, to use as a standard for determining whether a tenant’s actions were fraudulent or deceitful.

The ACOP also requires tenants to report any increase in their income within ten days, while the Annual Plan (page 30) states that tenants need only report increases in excess of \$100/month. The WRAB urges WHA to follow the reporting requirement set out in the Annual Plan and to amend the ACOP to be consistent with the Annual Plan. Such a rule will enable households that start earning more money to keep a larger part of their earnings, thus increasing the likelihood of achieving economic self-sufficiency.

i. Treatment of Income Changes Resulting From Welfare Program Requirements (ACOP Section 4-7(D))

It is the recommendation of the Woonsocket RAB to the Woonsocket Housing Authority (WHA) and its Board of Commissioners to include the following Language in ACOP Section 4-7(D):

Families whose welfare assistance is reduced specifically because of welfare fraud, or failure to comply with a work requirement specified in a completed and signed Family Independence Plan (FIP Plan) shall not have the rent reduced based on the welfare benefit reduction.

The WHA shall obtain third party verification from the welfare agency before denying the family's request for a rent reduction.

The WHA shall reduce the rents of welfare recipients who lose their benefits due to time limits, but have complied with all requirements and still cannot

obtain a job. This policy applies only in welfare sanction situations and not when benefits are reduced or terminated due to time limits. Further, it does not apply when benefits are reduced due to sanctions for failure to comply with a behavioral condition of the program other than one related to the parent's economic self-sufficiency. That is, if a family fails to comply with such matters as paternity establishment, learnfare or immunization/shotfare requirements and suffers a benefit reduction as a result, its rent must still be reduced under the usual income-based rent rules.

The WHA staff shall offer assistance to recipients/residents of FIP cash assistance in meeting the work requirement under the FIP rules.

The WHA shall ensure coordination between DHS and WHA of programs available to enhance recipients'/residents' employability.

The WHA shall inform the family in writing within 10 days upon receipt of the returned and completed verification form of the denial to perform an interim adjustment. The Authority shall inform the family that it is entitled to request an informal hearing in accordance with 24 CFR 982.555 (a)(1).

j. Determination of Annual Income (ACOP Section 4-8)

The ACOP does not incorporate the mandatory earned income exclusion set forth in 42 USC Section 1437a(d) for recently re-employed households, for families with increased earnings due to participating in family-self sufficiency programs, job training programs, and for welfare recipients who experience increased income. WHA needs to add this exclusion to ACOP Section 4-8. WHA should also consult with the WRAB and determine whether any additional earned income exclusions should be added to the ACOP.

k. Evictions (ACOP Section 4-11)

WHA incorrectly states that termination of tenancy is mandatory for certain lease violations involving the use of controlled substances or alcohol. The US Housing Act provides that leases include provisions for eviction of tenants for certain offenses involving drug and alcohol abuse, but that is not the same as mandating the eviction of every tenant who has a substance abuse issue. Again, WHA is required to look at evidence of

rehabilitation (as noted above, pages 11-12). Moreover, for evictions involving criminal activity, 24 CFR 966.(k)(5) the PHA has the discretion to consider all the circumstances before making a decision to evict:

In deciding to evict for criminal activity, the PHA shall have discretion to consider all of the circumstances of the case, including the seriousness of the offense, the extent of participation by family members, and the effects that the eviction would have on family members not involved in the proscribed activity. In appropriate cases, the PHA may permit continued occupancy by remaining family members and may impose a condition that family members who engaged in the proscribed activity will not reside in the unit. A PHA may require a family member who has engaged in the illegal use of drugs to present evidence of successful completion of a treatment program as a condition to being allowed to reside in the unit.

This language should be added to the ACOP.

2. Adding Tenant Members to WHA Board of Commissioners

Presently, there are no tenant members on the WHA Board of Commissioners and the WHA has no plan to add tenants to the WHA Board. Federal law requires the WHA Board to have tenant members. It is the recommendation of the WRAB to WHA and its Board of Commissioners that the Annual Plan contain a statement indicating that there be two or more tenant commissioners elected by public housing residents, who should be occupants of public housing. The elections should be held in such a way so as to provide a fair opportunity for all public housing residents, as well as Section 8 certificate holders, to be given an opportunity to vote.

NOTE: Federal regulations require resident board members. See final rule; Federal Register/vol. 64, no. 203/Thursday, October 21, 1999/Rules and Regulations, 24 CFR Part 964.420. This mandate was imposed by HQWRA and was effective on October 1, 1999.

3. Income Targeting/ Deconcentration

The WHA should retain its targeting of public housing resources for the very low-income, and for those with the greatest relative housing need. The WRAB does not favor systems which would allow applicants with little or no relative housing need, but with

relatively high incomes, to “skip over” persons who have been on the waiting list for a longer period of time and who have greater housing needs. The WHA should concentrate its economic diversity efforts on trying to upgrade the incomes of persons already living in its public housing developments, and provide incentives for working families who improve their situation while in public housing to remain in public housing. By assisting lower-income residents to become higher-income residents, the WHA will have been successful in its mission to deconcentrate poverty. WHA should offer incentives to lower-income residents which include giving priority to Section 3 training slots, providing escrow savings accounts, creating additional exclusions to earned income, providing after school programs, child care facilities, transportation services, and training opportunities. If the WHA is to meaningfully engage in a program of deconcentration, these incentives must be made available to current lower-income tenants.

The WHA’s deconcentration plan *does not include one single concrete plan* for how to help its lower-income tenants move into higher income neighborhoods. WHA should explore the creation of a mobility program to enable Section 8 voucher holders find housing in higher income census tracts.

Respectfully Submitted:

Woonsocket Residents Advisory Board

By:



Woonsocket Housing Authority

679 Social Street • Woonsocket, Rhode Island 02895-2090

Board of Commissioners
Woonsocket Housing Authority
C/O 679 Social Street
Woonsocket, RI 02895

November 18, 1999

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Respectfully yours,



Stephen A. Vadnais, Executive Director

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Commissioners: Mary F. Landreville, *Chairwoman* • John J. Kennedy, Jr., *Vice Chairman*
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Woonsocket Housing Authority
 SCHEDULE OF MAINTENANCE CONTRACT COSTS
 FISCAL YEAR: December 31, 1999

PRORATION BY PROJECT (INCLUDES ALL FEDERAL DEVELOPMENTS)

LINE No.	ACCT. No.	DESCRIPTION	Proraton code	TOTAL	ALL	RI-1	RI-2	RI-3	RI-4	RI-5	RI-6	RI-7	RI-8	Total	Budget FY 98		
<u>4430 Contract Costs</u>																	
		<u>Type of Contract</u>	<u>Name of Vendor</u>	<u>Terms</u>													
1		Rubbish Disposal & Dumping Fees		Annual	0	67,000	60,000		1,650	2,000	1,500	1,850		67,000	66,000		
2		Pest Control		Monthly		7,000	250	3,150	3,600					7,000	7,000		
3		Elevator Service		Annual		25,200	1,200		6,000	6,000	6,000	6,000		25,200	27,000		
4		Vehicle Repairs				9,000	4,300	2,000	2,000	700				9,000	12,000		
5		Snow Removal/Sanding				11,000	8,900	900	1,200					11,000	15,000		
6		Painting				10,000		5,000	5,000					10,000	10,000		
7		Fire Control				4,620	1,320		1,600	350	350	350	650	4,620	5,000		
8		Master Antenna				500			500					500	0		
9		Landscaping/Lawn Care				40,000	36,850	1,000	1,100			1,250		40,000	50,000		
10		Appliance Repair				5,900	1,025	800	3,150	100	500	100	225	5,900	4,000		
11		Plumbing & Heating Repair				28,700		2,200	4,500	600	1,700	7,500	12,000	200	23,700	24,000	
12		Communications				750	750							750	0		
13		Generators Service				5,000	2,200	300	200	200	900	200	200	800	5,000	7,500	
14														0	0		
15		Security Systems	Shannex			1,200	1,200							1,200	10,000		
16		Welding				800	100	200	150	150		200		800	0		
17		Site Work - Incl sidewalk reps				30,000		5,000	5,000	0	2,000	4,500	10,000	2,500	1,000	30,000	20,000
18		Utility Repair				18,000		10,730	720	550	220	880	150	250	4,500	18,000	10,000
19		Miscellaneous				10,000	10,000								10,000	66,000	
20		Campus of Learners				20,000			20,000					20,000	0		
21		Emergency Repairs				0								0	0		
22		Flooring/Tiling				0								0	0		
23		Electrical Repair				0								0	0		
24		Answering Service				0								0	0		
25		Carpet Replacement				0								0	0		
26		Beeper Service				0								0	0		
27						0								0	0		
28						0								0	0		
29						0								0	0		
30						0								0	0		
31						0								0	0		
TOTAL CONTRACT COSTS						<u>294,670</u>	<u>127,895</u>	<u>31,280</u>	<u>48,220</u>	<u>10,800</u>	<u>13,670</u>	<u>21,230</u>	<u>32,325</u>	<u>3,750</u>	<u>5,500</u>	<u>294,670</u>	<u>333,500</u>
							18.8%	28.9%	6.5%	8.2%	12.1%	19.4%	2.2%	3.3%			

Proraton Codes	2	D Direct	C Actual Usage	23.0%	23.0%	11.5%	15.2%	11.7%	11.7%	2.4%	1.5%	100.0%
				18.8%	28.9%	6.5%	8.2%	12.1%	19.4%	2.2%	3.3%	100.0%

Woonsocket Housing Authority
SCHEDULE OF SECURITY CONTRACT COSTS - Operating Budget
FISCAL YEAR: December 31, 1999

PRORATION BY PROJECT (INCLUDES ALL FEDERAL DEVELOPMENTS)

LINE No.	ACCT. No.	DESCRIPTION	TOTAL	Proration										Total			
				ALL	RI 3-1	RI 3-2	RI 3-3	RI 3-4	RI 3-5	RI 3-6	RI 3-7	RI 3-8					
4480		Security Contract Costs															
		Type of Contract															
		Name of Vendor															
		Terms															
1		IBPO foot patrol details 4 days/wk, 8 hrs/day @ \$27/hr, 52 wks/yr.	44,928	44,928													44,928
2																	0
3		Additional amount that may be needed to cover added patrols	2,800	2,800													2,800
4																	0
5																	0
6																	0
7																	0
8																	0
9																	0
10																	0
TOTAL CONTRACT COSTS			47,728	47,728	0	0	0	0	0	0	0	0	0	0	0	0	47,728

\$0

Proration Codes 2 23.0% 23.0% 11.5% 15.2% 11.7% 11.7% 2.4% 1.5% 100.0%

Woonsocket Housing Authority
 INSURANCE POLICIES AND COST
 BUDGET: December 31, 1999

TYPE	POLICY HOLDER	POLICY DATE	PREMIUM AMOUNT	RI 3 - 1-8	S8 Certs	S8 Vchr	Other	Total
Fire & Extended Coverage		1/1/99-2000	39,000	39,000				39,000
General Liability		1/1/99-2000	64,000	51,200 80.0%	8,960 14.0%	3,840 6.0%		64,000
Auto/Truck	Hous. Ins. Serv.	1/1/99-2000	13,300	13,300				13,300
Public Officials' Liability		1/1/99-2000	5,200	4,160 80.0%	728 14.0%	312 6.0%		5,200
Fidelity Bond		1/1/99-2000	600	480 80.0%	84 14.0%	36 6.0%		600
Boiler	Marsh McLellan	7/1/98-99	2,300	2,300				2,300
Misc. Adjustments								0
TOTAL				110,440	9,772	4,188	0	124,400

NOTES:

RI 3 - 1-8 S8 Certs S8 Vchr Other Total

WOONSOCKET HOUSING AUTHORITY
SUMMARY AND CALCULATIONS
OF EMPLOYEE BENEFITS
AND CALCULATION OF
"PAYROLL-RELATED" PRORATION
BUDGET F/Y/E December 31, 1999

05-Jan-99

<u>Type of Benefit</u>	<u>Calculation of Cost</u>						
Retirement	Gross Payroll:	\$1,022,602	Admin				
		130,033	Prot. Sev.				
		806,550	Labor (reg time)				
	7.0% of total payroll	\$1,959,185			=	\$137,143	
Workmens Comp	Clerical/Admin	\$1,152,635	0.248%	\$2,859			
	Non-Clerical/Maint.	806,550	2.536%	20,453			
	Total payroll	\$1,959,185			=	23,312	
FICA	7.65% of total payroll	\$1,959,185			=	149,878	
Health Insurance							
Blue Cross - Ind.	297.16	X	6	1,782.96			
Blue Cross - Fam.	679.28	X	8	5,434.24			
Health Mate - Ind.	268.58	X	9	2,417.22			
Health Mate - Fam.	599.25	X	29	17,378.25	27,012.67 /mcnth	324,152	
			52		average =	\$6,234	
				\$6,234 Avg per employee X	Est. No. of Empl. 55	=	342,853
Anticipated Savings from Change in Health Insurance Provider				HealthMate 2000			(25,000)
Delta Dental	\$2,940.89 /per month	X	12	35,290.68	/per yr.		
				X 1.025			36,173
TOTAL EMPLOYEE BENEFITS							\$664,359
				Prior year estimates	\$659,288		
					-0.7% increase		

<u>Calculation of "Payroll-Related" Proration</u>	<u>Rt.3-1-B</u>	<u>Comp Grant</u>	<u>Certificates</u>	<u>Vouchers</u>	<u>PHDEP</u>	<u>Sen.or.Serv</u>	<u>Total</u>
Administrative Salaries Totals	745,409	118,858	71,359	23,947	10,478	47,551	1,022,602
Security	118,905	10,764				0	129,669
Maintenance Labor Cost Totals	806,550						806,550
	1,670,864	129,622	71,359	23,947	10,478	47,551	1,958,821
percentage of total	85.4%	6.6%	3.6%	1.5%	0.5%	2.4%	100.0%
ROGRAMS' PORTIONS OF BENEFIT COSTS	567,363	43,648	23,917	9,965	3,322	15,945	664,359

33.92%

Woonsocket Housing Authority
 SECTION 8 BUDGET
 F/Y/E December 31, 1999
 21-Jan-99



CALCULATION OF ADMIN FEE

MAXIMUM NUMBER OF UNITS		2580		1188
		215		99
		Certificates		Voucher
APPLICABLE ADMIN FEE RATE	col A	\$55.74	col A	\$55.74
	col B	\$55.02	col B	\$55.02
Maximum Administrative fee		\$133,534		\$54,050
ADD: Mobility Prog. Income		5,808		5,595
Interest Income		0		0
Audit Fee		474		197
TOTAL PROJECTED FEE		<u>\$0 \$139,816 \$150,283</u>		<u>\$0 \$59,842 \$68,216</u>

BUDGETED AMOUNTS BY ACCOUNT		1996	1997	1998	1996	1997	1998
		Budget	Actual	Budget	Budget	Budget	Budget
4110	ADMINISTRATIVE SALARIES		83,292	68,612		38,934	27,841
4130	LEGAL		0	2,000		0	1,000
4140	TRAINING		0	2,155		0	1,078
4150	TRAVEL		856	2,156		0	1,078
4170	ACCOUNTING FEES		1,000	6,000		480	2,400
4175	AUDIT FEES		474	900		197	400
4180	OFFICE RENT		0			0	
4190	SUNDRY ADMINISTRATIVE EXP.		21,455	26,501		2,021	13,250
4400	OFFICE EQUIPMENT MAINTENANCE		65			0	
4510	INSURANCE		0			0	
4540	EMPLOYEE BENEFITS		29,545	23,792		13,791	8,592
4590	OTHER GENERAL EXPENSE		5,955	6,000		3,680	3,700
6010	PRIOR YEAR ADJUSTMENTS		24,373			0	
7520	REPLACEMENT OF EQUIPMENT		0			0	
7540	PROPERTY BETTERMENTS AND ADDITIONS - Admin Study						
			<u>\$0 \$167,015 \$138,115</u>			<u>\$0 \$59,103 \$59,338</u>	

NET SURPLUS OR DEFICIT PROJECTED FOR F/Y/E		12/31/98	12/31/99	12/31/98	12/31/99
		<u>\$0 (\$27,199)</u>	<u>\$12,168</u>	<u>\$0</u>	<u>\$8,878</u>
Operating Resrve - beginning 01/01/98			37,085		11,365
	actual		(6,099)		4,251
Current Operating Resrve 12/31/98			37,085		15,616
Direct Charges to the Reserve					
Annual Dinner					(6,000)
Other Direct Charges					
Tech Asst for Internal Reporting					
Net income of (Deficit) thru 10/98			(6,099)		4,251
Ending Operating Reserve Balance 1999			<u>30,986</u>		<u>18,494</u>

June 11, 1999

Ms. Donna J. Ayala, Acting Director
Office of Public Housing
New England Region
U.S. Department of HUD
Thomas O. O'Neil, Jr. Federal Building
10 Cauesway Street
Boston, MA 02222-1092

Re: Drug Elimination Program Grant Application (PHDEP)

Dear Ms. Ayala:

The Housing Authority of the City of Woonsocket, Rhode Island is pleased to submit an original and two identical copies of its drug elimination proposal for FY 1999 Public and Indian Housing Drug Elimination Program. WHA is a medium-sized agency with 1,291 units under management, and houses 2400 or 5.5% of City residents. \$28420.00 is requested from HUD to execute the Authority's Program that includes:

- Strong enforcement to reduce drug availability;
- Preventive programs conveying anti-drug messages and providing "alternative" opportunities for residents in the areas of school, work, recreation, and community service;
- Close cooperation with local service providers.

WHA has made progress in empowering and building community among residents, and combating drug abuse and related crime. In 1998, drug abuse violations per resident on WHA property was lower than the city rate. This hopeful sign results, in part, from WHA's close collaboration with the Woonsocket Police Department. This partnership has resulted in Community policing operating out of Development substations, an Operation Safe Home detective, and enhanced crime data collection and reporting for WHA developments.

The bulk of funding requested will support a wide array of preventive activities to attack the root causes of drug abuse. WHA remains vigilant, however, in continuing a dynamic law enforcement component; and building linkages to effective intervention and treatment services.

By October 2001, WHA plans to reduce its adult and juvenile Uniform Crime Indices by 20%, increase by 50% residents who are full-time employed, decrease by 30% resident school drop-outs, and enroll at least 100 youth in on-site local YMCA & YWCA services. These and other indicators will conveniently reflect the consistent involvement of resident adults, teenagers and children in healthy, drug-free activity.

Thank you very much for the opportunity to describe WHA's drug elimination program plans; and for HUD's consideration of this request for funding.

Sincerely,

Stephen A. Vadnais
Executive Director

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U.S. Department of Housing and Urban Development

New England Office of Public Housing
Boston HUB
Thomas P. O'Neill, Jr. Federal Building
10 Causeway Street
Boston, Massachusetts 02222-1092

New England

May 12, 1999

Stephen A. Vadnais, Executive Director
Woonsocket Housing Authority
679 Social Street
Woonsocket, Rhode Island 02895

Dear Mr. Vadnais:

This is to verify that according to the Department's Integrated Business System (IBS), the Woonsocket Housing Authority currently has 1,291 units in management.

Should you have any questions concerning this letter, please contact Marlene D. Piekarsky at (401) 528-5366.

Very sincerely yours, .

A handwritten signature in cursive script, appearing to read "Ernest M. Blanchette".

Ernest M. Blanchette
Division A Director
Office of Public Housing
New England Region

Role of Each Partner

Boy Scouts of America have a Boy Scout troop and pack at each of the Family Developments. They assist with camp scholarships in the summer.

City Year of Rhode Island provides volunteer service to improving the quality of life for children, families, and adults of all ages. City Year has provided for the past three years, Camp City Year, a weeklong vacation day camp for elementary school children. Annually, City Year conducts, Serve-a-thon day in which volunteers from the neighborhood, the city, corporations, residents and staff conduct service for WHA ranging from painting, landscaping, and renovate units. There is a team of six City Year corps members who works directly at the Campus of Learners site of WHA providing program development, recruitment, and leadership to members to members of Campus of Learners. City Year is an active participant on the Campus of Learners Advisory Committee

Connecting for Children and Families (CCF) a neighborhood initiative in the Fairmount area of Woonsocket where the Veterans' Memorial Family Development is located. As a partner with WHA, CCF has provided Camp Costa, the Teen Action Group, Early Childhood Initiatives, Adult Education Classes, Home Day Care Training, and Translation Services. CCF is an active participant on the Campus of Learners Advisory Committee.

Corporation for National Service provides Americorps* VISTA members to expand and implement a variety of self-help initiatives for WHA residents. There is one cost-share position at this time between WHA and the Corporation in which WHA pays their stipend and the Corporation pays for their allowances/medical insurance and educational awards.

Family Resources provides the case management services for the Family Self Sufficiency Program WHA. Through various other funds Family Resources continues to provide outreach services to WHA residents, they provide Comprehensive Emergency Services, Early Start programs, Early Intervention Programs, and Parenting Education Programs. Family Resources is an active participant on the Campus of Learners Advisory Committee.

Girl Scouts of America has a Girl Scout troop at the Morin Heights Development and will start recruitment this summer for the Veterans' Memorial Development.

Landmark Hospital collaborates with WHA and RSVP to provide the Health Adventures Program monthly to middle school age children to introduce them to volunteerism, mentoring and health services careers.

Literacy Volunteers of America in collaboration with Head Start, Project RIRAL, CCF have provided English as a Second Language classes on-site. Literacy Volunteers of America is an active participant on the Campus of Learners Advisory Committee

Morin Heights Resident Council is a partner with WHA by facilitating monthly meetings and being the liaison between residents and staff. They have by-laws and a signed Memorandum of Understanding with the WHA.

Project RIRAL is an adult education program. They provide daytime beginner and intermediate ESL classes at both family developments. In addition at Morin Heights Development they accommodate those who are functioning from the preliterate ESL to GED level. Project RIRAL also conducts an extensive evening program at the Woonsocket Senior High School open to all residents of Woonsocket. Project RIRAL is an active participant on the Campus of Learners Advisory Committee.

Retired Senior Volunteer Program (RSVP) provides literacy tutoring, including basic adult education, pre/GED, GED, Spanish GED, and ESL classes programs to WHA public housing residents. In addition, RSVP conducts a Kids Kare after school program for children in grades K-3 living in Morin Heights. RSVP also assigns volunteers to the Learning Express Program and the Health Adventures Program, which offer educational, life enrichment and character building activities to school age children living in public housing. RSVP is an active participant on the Campus of Learners Advisory Committee.

Veterans Memorial Resident Council is a partner with WHA by facilitating monthly meetings and being the liaison between residents and staff. They have by-laws and a signed Memorandum of Understanding with the WHA.

Woonsocket Even Start provides a Family Literacy Program to the residents. This program strives to improve the educational opportunities of parents and children through integrated program of adult education, parenting education, and early childhood education. Even Start is an active participant on the Campus of Learners Advisory Committee.

Woonsocket Head Start and Day Care provides services on-site just about half of their enrollment our WHA residents.

Woonsocket Neighborhood Development Corporation partners with WHA on the Project Build initiative providing a house as the work site for the training program.

Woonsocket Task Force on Substance Abuse provides technical assistance to the Drug Elimination Steering Committee, a number of WHA youth are involved in the Youth Committee and its related activities, WHA staff are part of the WTFSA's Substance Abuse Coordinating Team, Elderly Committee, Policy & Enforcement Committee, and Executive Committee.

Woonsocket Police Department works collaboratively with WHA collecting crime statistics, bi-weekly domestic violence meetings, substation officers, participation on the Drug Steering Committee, officers for surveillance for Operation Safe Home and technical support.

Attachment A
(Drug Elimination)

Drug Elimination Program Plan & Activity Descriptions

I. Prevention

I A. Educational Opportunities

1. Drug Education Information \$4,000

- Information and dissemination of educational materials will be printed and available to residents. It will be distributed at the Managers offices, Resident Services offices, Police Substation officers and utilization of the on-site branch library will have resources available such as books, brochures, videos, etc. The Woonsocket Task Force on Substance Abuse will assist WHA with this portion of the grant

B. Family and Other Support Services

1. Adult Education Programs \$20,000

- On-site educational programs such as Pre/GED, GED, Spanish GED, ESL classes and tutoring.

C. Youth Services

1. Youth Activities \$15,000

- On-site YMCA & YWCA recreational programming for various age groups and use of the YMCA pool for recreation and swimming lessons use.
- Community Based Athletic Scholarships-WHA will continue to fund partial or full scholarships allowing residents to participate in programs throughout the city. Some of the programs that will be funded would be Cracovia Soccer, Redskins Football, Little League, etc.

2. Camper ships \$30,000

- WHA will continue to sponsor vacation and summer camper ships to various programs such as: Boy Scouts, Girl Scouts, YMCA, YWCA, Camp Costa and City Year Camps

3. Tutoring/Mentoring Programs \$22,000

- Kids Kare-An after school reading comprehension program combining creative arts and literacy for children in kindergarten through grade three. The program is designed to help children develop various ways to understand concepts, and improve their reading and oral test scores.
- The Learning Express is a tutoring/mentoring program that provides after school education for children in grades three through five. The program helps students succeed in school by assisting them in their homework, and helping them develop good study habits. The program also helps to improve the children's social skills by conducting many cooperative learning activities.
- Health Adventures is a collaboration of WHA, Landmark Medical Center and RSVP. Monthly, 15 middle school age youth and 15 adult mentors attend sessions at the local hospital about various health care careers and associated issues.

D. Economic and Educational Opportunities

1. Cyberbuilders for Adults \$16,520

- WHA will sponsor a computer camp for adults. Participants will receive employment skills while building a computer. They will be provided with basic computer instruction, vocational training, team-building experiences and documented assessment of their educational needs and progress made in basic skills while in the program.

2. Vocational Training \$18,000

- Resident Security Training & Day Care Internship training providing residents with a stipend for six months.

3. Resident Leadership Training \$18,000

- Resident Leadership Development Conferences and programs that help promote achieving goals through education, develop effective communication skills both verbally and written, and learn how to make positive choices and overcoming adversity.
- Americorps*VISTA volunteers have been on-site at the Family Developments for the past three years. One of the volunteers is a partially funded with Drug Elimination funding. The volunteers work directly with residents by assisting with the Tenant Councils, providing translation and community organizing.

- II. Physical Improvements \$10,000
 - Place a camera at the Veterans' Memorial Development to monitor drug problems. Place one camera around the parking lot at the Morin Heights Family Development.

- III. Law Enforcement/Tenant Patrols
 - 1. Operation Safe Home \$40,000
 - The WHA would extend a contract of the services of undercover officer to continue Operation Safe Home in continued effort to rid the development of drug dealing thus reducing availability.

 - 2. Voluntary Tenant Patrols \$1,500
 - WHA would continue to support the establishment of Voluntary Resident Patrols at the two family developments in collaboration with the WHA Security Department and the Woonsocket Police Department. WHA will provide supplies required for the patrols. The WPD is establishing a city wide crime watch and the Resident Patrols will be incorporated into that effort.

- II. Program Administration and Other
 - 1. Staffing (See attached position descriptions)
 - Resident Services Program Specialist \$ 30,000
The Resident Services Program Specialist will oversee all Resident Services of the Family Developments. This position will be responsible for the overall coordination of the Drug Elimination Grant. Funding is 50% for the position of the second year.

 - Security Activities Coordinator \$ 28,000
Continued funding for a Security Activities Coordinator to assist the Security Administrator. Funding is 50% for the position of the second year.

 - Youth Activities Coordinator \$ 20,000
The Youth Activities Coordinator will be hired to coordinate youth sports, programs, etc. Funding is full time position for the second year.

 - 2. Program Evaluation Consultant \$3,000
 - A consulting contract will be used for annual PHDEP evaluation to assure quality compliance and effectiveness.

3. Training \$5,500

- Community Police & Safe Home Training
Training would expand on community relations, diversity training, and drug interdiction techniques etc.
- WHA staff training
Staff development around PHDEP, diversity training and other skills necessary to successfully implement the PHDEP plan.

4. Transportation \$2,500

- Providing transportation via bus or van to various programs and activities

MILESTONES for PHDEP 1999

	<i>Jan, 2000</i>	<i>Dec, 2001</i>
Law Enforcement		
Operation Safe Home	Quarterly progress reports _____	
Tenant Patrols	Ten resident trained weekly patrols _____	
Drug Prevention		
Drug Information	Gather material _____	Monthly survey review _____
Resident Leadership Training	Maintain attendance at resident council meetings _____	
	<i>Sep, 2001</i>	<i>Jun, 2001</i>
Learning Express	enroll students	student pass to next grade
Kids Kare	enroll students	improved test scores
Health Adventures	enroll 15 students	competing of program
Cyberbuilders	Purchase computer kits	enroll 12 residents
GED, ESL & Tutoring	_____	10 residents complete program
Adult Vocational Training	_____	8 resident complete program
Camperships	200 hrs community service completed _____	
YMCA/TWCA Programs	Check school attendance records _____	
Physical Improvements		
Camera Installation	Bids received _____	Equipment installed _____

9170 Other Cost Training Transportation	Exec Director Res Program Spec	\$5,500 \$2,500									
---	-----------------------------------	--------------------	--	--	--	--	--	--	--	--	--

FY 1999 PHDEP Summary Budget Information

(HUD Automated Tracking)

Name and Address of Applicant: Woonsocket Housing Authority
679 Social Street
Woonsocket, RI 02895

Program: PHDEP

Field Office: Providence RI

List amounts budgeted for each line item. These line items and amounts will be programmed into HUD's Line of Credit Control System (LOCCS) for designating and tracking uses of drawdowns.

Detailed Description of Budget

Budget Line Item No.	Activities	Funds Requested	Funds Approved (HUD use only)
9110	Reimbursement of local law enforcement agencies over and above baseline service	\$40,000	\$
9120	Security Personnel		
	1. HA Employment of Security Personnel	\$	\$
	2. Contracted/HA Security Guards	\$	\$
	3. Equipment for and Employment of Personnel for Housing Authority Police Department Personnel/Equipment	\$	\$
	Sub-Total: (1-3)	\$	\$
9130	Employment of Investigator(s)	\$	\$
9140	Voluntary Tenant Patrol	\$ 1,500	\$
9150	Physical Improvements	\$ 10,000	\$
Programs to reduce the use of illegal drugs			
9160	Drug Prevention	\$143,520	\$0
9170	Drug Intervention		\$
9180	Drug Treatment	\$	\$
Grant Administration			
9190	Other Program Costs	\$ 89,000	\$
	HA Total funding requested:	\$ 284,020	\$0
HUD Official Use: Total funding approved by HUD		\$	\$

Drug Elimination Program Plan & Goals

I. Prevention

I A. Educational Opportunities

1. Drug Education Information

- Information and dissemination of educational materials will be printed and available to residents. It will be distributed at the Managers offices, Resident Services offices, Police Substation officers and utilization of the on-site branch library will have resources available such as books, brochures, videos, etc. The Woonsocket Task Force on Substance Abuse will assist WHA with this portion of the grant

Goal- Distribute current information pertaining to substance abuse prevention targeting all age groups for the next five years. Success of the program will be measured by surveys regarding the use and content of materials.

B. Family and Other Support Services

1. Adult Education Programs

- On-site educational programs such as Pre/GED, GED, Spanish GED, ESL classes and tutoring.

Goal-To provide educational programs to 50 residents each year for the next five years. The success of the program will be measured by a minimum of 5 residents obtaining their GED and 5 residents completing the ESL program annually for the next five years.

C. Youth Services

1. Youth Activities

- On-site YMCA & YWCA recreational programming for various age groups and use of the YMCA pool for recreation and swimming lessons use.
- Community Based Athletic Scholarships-WHA will continue to fund partial or full scholarships allowing residents to participate in programs throughout the city. Some of the programs that will be funded would be Cracovia Soccer, Redskins Football, Little League, etc.

Goal- Participants will maintain a 90% or better attendance in school. Success of the program will be measured by 95 % of the participants maintaining the 90% requirement

for the next five years. It will be measured by monitoring school records for the next five years.

2. Camperships

- WHA will continue to sponsor vacation and summer camperships to various programs such as: Boy Scouts, Girl Scouts, YMCA, YWCA, Camp Costa and City Year Camps

Goal- Each participant will provide two hours of community service prior to the start date of camp for the next five years. The success of the program will be measured by 100% of participants completing the service and having evaluation form completed.

3. Tutoring/Mentoring Programs

- Kids Kare-An after school reading comprehension program combining creative arts and literacy for children in kindergarten through grade three. The program is designed to help children develop various ways to understand concepts, and improve their reading and oral test scores.
- The Learning Express is a tutoring/mentoring program that provides after school education for children in grades three through five. The program helps students succeed in school by assisting them in their homework, and helping them develop good study habits. The program also helps to improve the children's social skills by conducting many cooperative learning activities.
- Health Adventures is a collaboration of WHA, Landmark Medical Center and RSVP. Monthly, 15 middle school age youth and 15 adult mentors attend sessions at the local hospital about various health care careers and associated issues.

Goal-To have 80% of participants pass to the next grade level in school. The success will be measured by participants showing appropriate staff report cards indicating succession to the next grade.

D. Economic and Educational Opportunities

1. Cyberbuilders for Adults

- WHA will sponsor a computer camp for adults. Participants will receive employment skills while building a computer. They will be provided with basic computer instruction, vocational training, team-building experiences and documented assessment of their educational needs and progress made in basic skills while in the program.

Goal- To provide an economic educational skill building alternative program in which participants will obtain a minimum of a 70 grade out of 100 on a final exam in order to receive a successful completion certificate.

2. Vocational Training

- Resident Security Training & Day Care Internship training providing residents with a stipend for six months.

Goal- To provide educational and employment training to a minimum of six residents per year for the next five years. The success of the program will be measured by at least three participants obtaining full time employment.

3. Resident Leadership Training

- Resident Leadership Development Conferences and programs that help promote achieving goals through education, develop effective communication skills both verbally and written, and learn how to make positive choices and overcoming adversity.
- Americorps*VISTA volunteers have been on-site at the Family Developments for the past three years. One of the volunteers is a partially funded with Drug Elimination funding. The volunteers work directly with residents by assisting with the Tenant Councils, providing translation and community organizing.

Goal- To increase the attendance at Council Meetings facilitated by residents by 50% for the next five years. The success will be measured by maintaining records of attendance for each meeting.

II. Physical Improvements

- Place a camera at the Veterans' Memorial Development to monitor drug problems. Place one camera around the parking lot at the Morin Heights Family Development.

Goal- To reduce crime in the area by 20%. Crime such as (graffiti, and gang violence) for the next five years. This will be measured by crime statistics.

III. Law Enforcement/Tenant Patrols

1. Operation Safe Home

- The WHA would extend a contract of the services of undercover officer to continue Operation Safe Home in continued effort to rid the development of drug dealing thus reducing availability.

Goal- To reduce drug activity and increase drug arrests by 20% each year for the next five years. This will be measured by crime statistics.

2. Voluntary Tenant Patrols

- WHA would continue to support the establishment of Voluntary Resident Patrols at the two family developments in collaboration with the WHA Security Department and the Woonsocket Police Department. WHA will provide supplies required for the patrols. The WPD is establishing a city wide crime watch and the Resident Patrols will be incorporated into that effort.

Goal- To increase participation by 10 residents each year for the next five years having a 20% reduction in Part II crime.