

PROPOSED

Annual Plan for Fiscal Year 2012-13



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Executive Summary of the Annual PHA Plan

[24 CFR Part 903.7 9 (r)]

The San Francisco Housing Authority (SFHA) has prepared the following Agency Plan in compliance with Section 511 of the Quality Housing and Work Responsibility Act of 1998 and the ensuing HUD requirements. This Agency Plan contains a Five-Year Plan, which will be updated annually, and an Annual Plan. Listed below are some of the primary goals that the SFHA currently plans to pursue based on its Five-Year Plan:

- Expand the supply of assisted housing
- Improve the quality of assisted housing
- Increase assisted housing choices

The SFHA's Annual Plan is based on the premise that accomplishing the above five-year goals and objectives will move the SFHA in a direction consistent with its mission. The ability of SFHA to accomplish the above goals will be dependent on appropriate funding from the U.S. Congress and HUD that is commensurate with regulations that the SFHA must meet. The plans, statements, budget summary, policies, etc. set forth in this Annual Plan all lead towards the accomplishment of the SFHA's goals and objectives. Taken as a whole, they outline a comprehensive approach towards the SFHA's goals and objectives and are consistent with the City and County of San Francisco's Consolidated Plan. Below are a few highlights from the SFHA's Annual Plan:

- Updates to the SFHA's Admissions and Continued Occupancy Policy;
- Updates to the SFHA's Housing Choice Voucher (HCV) Administrative Plan;
- An emphasis on public housing revitalization and redevelopment; and
- Profile of current SFHA resources.

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[24 CFR Part 903.12(b)]

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PHA Five-Year and Annual Plan

1.0 PHA Information

PHA Name: **San Francisco Housing Authority**

PHA Code: **CA001**

PHA Type: **Standard**

PHA Fiscal Year Beginning: **Oct. 1, 2012**

2.0 Inventory (based on ACC units at time of FY beginning in 1.0 above)

Number of PH units: **6,259**

Number of HCV units: **8,225**

3.0 Submission Type

Five-Year and Annual Plan

4.0 PHA Consortia PHA Consortia (Check box if submitting a Joint Plan: **N/A**)

5.0 FIVE-YEAR PLAN

Section 5.1

Mission

The San Francisco Housing Authority's (SFHA) mission is to provide decent, safe and sanitary housing for nearly 12,000 public housing residents and 21,000 HCV participants, and to pursue opportunities that increase the supply of affordable housing in San Francisco.

A primary goal of the SFHA is to continue to provide housing for our low-income, very low-income and extremely low-income households, while integrating housing and economic opportunities for residents and maintaining high standards of property management, fiscal management and service delivery.

The mission of the SFHA is achieved through collaboration with our residents, community partners and government agencies, emphasizing teamwork, mutual respect, integrity and accountability.

Section 5.2

Goals and Objectives

SFHA GOAL #1: Expand the Supply of Assisted Housing

Objectives

- Reduce public housing vacancies by shortening turnaround time, improving curb appeal and pre-leasing units.
- Apply for rental vouchers including HCV, special purpose, Relocation, Replacement Housing, VASH and others as they become available.
- Add infill affordable and market-rate housing, where density permits, at family and elderly/disabled public housing developments.
- Use HCV Project-Based Voucher Program assistance with revitalization of public housing sites and in partnership with community housing providers.
- Acquire or build units or developments through partnerships and collaborations with developer partners, community organizations and government agencies with Replacement Housing Factor, Section 202 or HCV 11 funds that increase housing opportunities and income streams to SFHA.
- Leverage private or other public funds to create additional housing opportunities and economic development opportunities, financing which may include Low Income Housing Tax Credits, Tax Exempt Bonds and New Market Tax Credits.
- Review voucher payment standards.

SFHA GOAL #2: Improve the Quality of Assisted Housing

Objectives

- Increase customer satisfaction through better customer service with performance standards, quality control procedures and staff training on annual reviews, rent collections, rent calculations and verification.
- Improve public housing management (PHAS) scores.
- Improve voucher management (SEMAP) scores.
- Concentrate on efforts to improve specific management functions including unit inspections and routine work order completion time.
- Timely implementation of regulatory changes.

Section 5.2 Continued

- Renovate or modernize public housing units with Capital Fund Program and other public and private financing including Capital Fund Financing Program, energy services contracting, low-income housing tax credits, tax-exempt bonds and other financing that may become available.
- Apply for Transformation of Rental Assistance vouchers and other subsidies that increase financing opportunities for modernization of properties.
- Demolish and replace obsolete public housing.
- Provide replacement public housing through the City and County of San Francisco's HOPE SF initiative and seek funding including HOPE VI, Replacement Housing Factor, low-income housing tax credits, tax-exempt bonds, conventional financing, Housing Choice Neighborhoods, Neighborhood Stabilization Program, other federal and state programs.
- Apply for and secure replacement vouchers for replacement public housing at sites being revitalized.
- Partner with housing developers, non-profit community and supportive service organizations and city agencies to rebuild public housing sites and provide services to residents.
- Repair and/or replace obsolete building systems as needed at various developments.
- Seek investment properties that would provide income streams for operations.

SFHA GOAL #3: Increase Assisted Housing Choices

Objectives

- Provide voucher mobility counseling.
- Conduct outreach efforts to potential voucher landlords.
- Maximize voucher payment standards.
- Implement voucher homeownership program.
- Utilize a voucher homeownership program in conjunction with comprehensive revitalization, infill housing, partnerships with community-based organizations, city agencies, and other homeownership programs.
-

Section 5.2 Continued

- Work to expand the Family Self Sufficiency (FSS) program and the homeownership program by seeking additional HUD funding.
- Use HCV Project-Based Voucher Program assistance, low-income housing tax credits, affordable homeownership and market-rate rental and for-sale housing in conjunction with public housing revitalization efforts to increase supply of housing units in new mixed-income communities.
- Utilize to the fullest extent possible the HCV Project-Based Voucher Program.
- Implement homeownership programs for public housing residents.
- Implement public housing site-based waiting lists for HOPE VI developments.

SFHA GOAL #4: Provide an Improved Living Environment

Objectives

- Where necessary, install security cameras in and around public housing sites.
- Partner with the San Francisco Police Department in implementing community policing strategies at public housing sites.
- Designate developments or buildings for particular resident groups (elderly, disabled).
- Employ public housing residents to assist in providing a safe environment for residents through monitoring and crime prevention services.
- De-concentrate poverty at lower-density developments by replacing the public housing with housing for households with a range of incomes, adding other ancillary non-residential uses and creating mixed-income, mixed-use communities.
- Develop better one-on-one relationships with communities surrounding family and senior housing sites.
- Implement measures to de-concentrate poverty by bringing higher-income PHA-qualified households to lower-income developments.
- Attend and coordinate neighborhood safety meetings.

Section 5.2 Continued

SFHA GOAL # 5: Promote Self-Sufficiency & Asset Development of Assisted Households

Objectives

- Increase resident training and access to technology and Internet by providing support in the deployment and execution of the City and County of San Francisco's free wireless access initiative and by extending technical support and consulting services at SFHA properties.
- Increase the number 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.
- Identify and implement programs with community-based partners that can promote family self-sufficiency, employment training placement and first-time homeownership opportunities for low-income families.
- Apply for as many SuperNOFA grants as applicable, including the ROSS grant funds.
- Utilize Section 3 goals and the SFHA 25 percent resident hire policy with contracting to provide more employment opportunities for public housing residents.

SFHA GOAL #6: 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 or 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 or disability.
- Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities through reasonable accommodations and priority transfers.
- Respond to residents and applicants relating to possible discrimination-based incidents and implement procedures for addressing allegations of incidents with a perceived or actual discriminatory dimension.
- Investigate allegations of discrimination based on sexual orientation.

Section 5.2 Continued

SFHA GOAL #7: Expand Customer Care Services and SFHA Practices

Objectives

- Deploy an online portal that will provide easy access to data pertinent to clients in the HCV, public housing and other services provided by the SFHA.

6.0 PHA Plan Update

The SFHA will continue to seek out funding opportunities to support efforts to move families to self-sufficiency.

Capital Fund Update

In consultation with the Resident Advisory Board:

- The SFHA developed the 2012 Capital Fund Program and Replacement Housing Factor Annual Statements to submit the initial budget for the new grants.

PHA Plan Elements & Agency Plan Availability

Copies of the 2012 Draft Agency Plan are available for review at:

- Public Housing Development Management Offices
- SFHA's central office located at 1815 Egbert Ave., San Francisco, California 94124
- www.sfha.org (under the section labeled ("2012 PHA Annual Plan"))
- The San Francisco Public Library, Main Branch, 100 Larkin Street, San Francisco, California 94102

Copies of the HCV Administrative Plan can be found at the HCV offices and at the SFHA website.

Copies of the Admissions and Continued Occupancy Policy (ACOP) can be found at the Public Housing Development Management Offices, the Public Housing Management Office and also at the SFHA website.

PHA Plan Elements (24 CFR 903.7)

Eligibility, Selection and Admissions Policies including de-concentration and Wait List Procedures are included for the HCV program in the HCV program Administrative Plan and for the public housing program in the ACOP. All of the SFHA's policies and procedures adhere to the Code of Federal Regulations and all state and local applicable laws. These documents include policies and procedures governing resident or tenant eligibility, selection and admission that include applicable preferences for both programs. Additionally, the ACOP describes unit assignment policies for public housing. Proposed Changes to the ACOP may be viewed in Attachment 6.

Both the HCV Program Administrative Plan & the ACOP include the procedures for maintaining wait lists for admission. Proposed changes to the HCV Administrative Plan may be viewed in Attachment 7.

Rent Determination:

All rent determination policies and procedures are found in the Housing Choice Voucher Program (HCV) Administrative Plan and the ACOP for their respective programs. The SFHA has no ceiling rents and there are no plans to adopt any discretionary deductions or exclusions. The minimum rent for public housing is \$25. The HCV program currently has a \$25 minimum rent that will continue to remain in effect. As required by the regulations, financial hardship provisions are made available to residents and participants of both programs who qualify.

Operation and Management:

All rules, standards and policies governing maintenance and management of public housing

(owned, assisted or operated) that include measures for the prevention and eradication of pest infestation are found in the ACOP, SFHA Annual Income Guidebooks and Manual I & II of Policy & Procedures (MPP). Most of the documents can be found at all public housing sites. All information regarding management and participant policies for the HCV program are found in the HCV Admin Plan, the MPP, HCV Annual Income Guidebook, FSS action plan and in Policy & Procedure Memos.

Grievance Procedures:

For public housing, grievances policy and procedures are outlined in the Admissions and Continued Occupancy Policy, which ranges from an informal settlement conference to a formal hearing. This provides residents with due process that ensures the protection of their rights and liberties.

For HCV participants, grievance policy and procedures are outlined in the Housing Choice Voucher Program Administrative Plan, which ranges from an informal review for an applicant to informal hearing procedures for families assisted by the HCV tenant-based assistance program in addition to federal requirements found at 24 CFR Part 982. These policies and procedures can be found in the Housing Choice Voucher Administrative Plan.

Designated Housing for Elderly and Disabled Families:

The SFHA does not currently plan to designate or apply for designation of any of its public housing properties for occupancy by elderly or disabled families as any properties for senior/disabled are "mixed" containing both senior and disabled.

Community Service and Self-Sufficiency:

The SFHA is committed to providing services to its resident. While the reduction in funding for resident programs has reduced the number of programs available, the SFHA, through relationships with the Office of Economic and Workforce Development, has committed itself to assisting residents obtain employment. The SFHA has partnered with various organizations for grants throughout the year including the Youthbuild Grant, which would provide funding for the job training and high school diploma of 67 participant youth, the ROSS grant, providing service

Coordinators to senior sites, and hosting orientations for our residents to introduce them to programs available to them in San Francisco. Further, the SFHA runs a resident concierge program, which only hires residents, trains residents at no cost, and provides them with a Security Guard Card to enter private employment or continue with the SFHA and guard their own communities.

The San Francisco Housing Authority, through partnerships with community based agencies and government agencies, offers the following services to residents of public housing:

- a. Boys and Girls Club Clubhouses at Sunnydale and Hunters Point “A” East
- b. Head Start centers at North Beach, Sunnydale, Westside Courts and Alemany
- c. Service Coordinators at Clementina Towers, 360 Ellis Street, 666 Ellis Street and Rosa Parks, Woodside Gardens, Mission Dolores, 363 Noe Street, 462 Duboce Street, 25 Sanchez Street, 491 31st Avenue, 430 Turk Street, 939 Eddy Street, and 951 Eddy Street
- d. Economic Opportunity Council Child Development Centers at Potrero Annex and Ping Yuen
- e. Food pantries at Sunnydale, Hunters Point “A” West, Rosa Parks, 350 Ellis Street and 666 Ellis Street
- f. Summer lunch program at approximately 15 family developments
- g. Afterschool enrichment programs at Ping Yuen, Sunnydale, Westbrook Apartments,
- h. Computer lab at Westside Courts
- i. 24-hour domestic violence crisis line through WOMAN, Inc.

The San Francisco Housing Authority will continue to comply with Section 3 goals and objectives. Prospective contractors will identify public housing residents who can be referred to construction and non-construction jobs that the SFHA lets out to bid.

The SFHA’s HCV Department will oversee the reorganization of its FSS program.

Community Service requirements for public housing residents is monitored by individual property managers at the time of annual recertification. The 2012 Annual Plan includes proposed language regarding the Community Service requirement.

Safety and Crime Prevention:

The mission of the Department of Security is to provide excellent customer service, reduce crime, create a safe environment, build trust, and enhance the quality of life for the residents of public housing.

The San Francisco Housing Authority (SFHA), given the number of residents it serves, has a need to provide security at its family and senior/disabled sites. This year the SFHA was awarded a \$250,000 grant to be used towards security at various developments. The funds will be used to provide security cameras and security fences at numerous SFHA sites. At some of its senior/disabled properties, the SFHA has created a Building Concierge program to provide a security presence in lobbies. All visitors and guests must sign in with the concierge prior to seeing a resident. All concierges are paid and are residents of public housing.

In an effort to provide security the SFHA continues to operate with a Memorandum of Understanding (MOU) with the San Francisco Police Department (SFPD) and private security firms. Additionally, the SFHA has implemented a comprehensive safety camera strategy at its senior/disabled and family sites.

The SFHA has an MOU with the SFPD to provide supplemental police services. As part of the MOU the SFPD has agreed to provide a police commander to oversee all activities associated with public housing property. All information from the SFPD's precincts is channeled through the commander and passed on to SFHA staff. The SFHA continues to work with city officials and the San Francisco Police Department to allocate additional resources and to increase patrolling of the other developments and explore new ways to increase security and reduce crime in and around our developments.

Pets:

The SFHA has a no pet policy. The ownership of specified animals is restricted to seniors and the disabled as pursuant to Federal and State guidelines. The SFHA pet policy was developed with the input of residents and the Resident Advisory Board.

Civil Rights Certification:

The Civil Rights Certification is bundled with the PHA Plan Certification of Compliance with the PHA Plans/Related Regulations and will be submitted to the San Francisco area office of HUD. The SFHA examines its programs and proposed programs to identify impediments to fair housing choice within those programs and addresses any impediments to the best of our ability given any financial limitations.

Fiscal Year Audit:

The SFHA is 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)) and will submit the most recent fiscal audit to HUD. (**See Attachment 3.**)

Asset Management:

SFHA is performing asset management functions for the public housing inventory by monitoring development-based financial reports and key property management indicators on a monthly basis. Site visits are conducted and reports are provided monthly by the property managers on activities occurring at the development. Capital investment needs are monitored on a monthly basis to prioritize urgency and need.

Violence Against Woman Act:

The Housing Authority, in response to the Violence Against Woman Act (VAWA), has implemented changes to the HCV Administrative Plan and the Public Housing ACOP and lease. Such changes include:

Bifurcation of the Public Housing lease for victims of domestic violence, dating violence, sexual assault or stalking.

That an applicant or participant is, or has been, a victim of domestic violence, dating violence or stalking, is not an appropriate basis for denial or termination of program assistance, or for denial of admission to any assisted housing program, if the applicant otherwise qualifies for assistance or admission.

The SFHA may not terminate assistance to a participant in any assisted housing program on the basis of an incident or incidents of actual or threatened domestic violence, dating violence or stalking against that participant.

Vouchers shall not be cancelled for a member or members of a family who move out in violation of the lease due to a threat or perceived threat of domestic violence dating violence or stalking.

Criminal activity directly relating to domestic violence, dating violence or stalking shall not be considered a serious or repeated violation of the lease by the victim or threatened victim of that criminal activity or justify termination of assistance to the victim or threatened victim.

For more detail on language changes, please refer to HCV Administrative Plan Sections as well as the Admissions and Continued Occupancy Policy.

The SFHA will work with non-profit organizations to apply for grants to provide additional services for victims of domestic violence.

San Francisco Housing Authority		
Financial Resources		
Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (Oct. 1, 2012)		
a) Public Housing Operating Fund	\$33,765,083	
b) Public Housing Capital Fund	\$11,061,806	
c) Annual Contribution for HCV Tenant Based Assistance	\$123,936,974	
d) ROSS Grants	\$0	
e) CDBG, MOCD, & MOH	\$0	
f) CPD Technical Assistance Grant (NI)	\$0	Modernization Activities
Other Federal Grants		
CFP Replacement Housing Factor	\$400,000	Modernization Activities
2. Prior Year Federal Grants		
(Unobligated Funds Only) List Below		
2008 CFP (As of 3/31/12)	\$0	Modernization Activities

2008 CFP- RHF (As of 3/31/12)	\$0	Modernization Activities
2009 CFP-ARRA (As of 3/31/12)	\$0	Modernization Activities
2009 CFP (As of 3/31/12)	\$5,822	Modernization Activities
2009 CFP-RHF (As of 3/31/12)	\$0	Modernization Activities
2009 CFRC (As of 3/31/12)	\$0	Modernization Activities
2009 CFRC (As of 3/31/12)	\$0	Modernization Activities
2009 CFRC (As of 3/31/12)	\$0	Modernization Activities
2010 CFP (As of 3/31/12)	\$563,789	Modernization Activities
2010 CFP-RHF (As of 3/31/12)	\$235,123	Modernization Activities
2011 CFP (As of 3/31/12)	\$857,154	Modernization Activities
2011 CFP-RHF (As of 3/31/12)	\$384,342	Modernization Activities
3. Public Housing Dwelling Rental Income		
Estimated Annual Rent Roll (Oct. 1, 2011)	\$18,504,348	Management and Maintenance Operations
4. Other Income (List Below)		
Mod Rehab	\$8,813,713	HCV Tenant Based Assistance
HOPWA	\$2,967,556	HCV Tenant Based Assistance
5. Non-Federal Sources (List Below)		
HOPE SF (2007)	\$3,123,058	Modernization Activities
ESCO	\$21,777,239	Modernization Activities
Total Resources	\$226,396,007	

Membership of Resident Advisory Board

Two Resident Advisory Boards were created, one for public housing residents and another for HCV participants.

The HCV Resident Advisory Board (RAB) is made up of participants in the HCV program who have volunteered to serve on the HCV Advisory Committee. The SFHA sent an application to every HCV participant to be on the 2012 RAB. Of the 9,300 applications sent out, 300 participants applied. The SFHA randomly selected 30 participants who made up the 2012 HCV RAB. Due to the various locations of the area served by the HCV's programs, meetings were the most effective means to provide RAB members the opportunity to learn about the Agency and Administrative Plans, the role of the RAB, and to give input into how the SFHA administers the program and opinions on potential significant changes. Due to privacy issues, the actual names of the HCV RAB members will not be listed here. All meetings were open to the public.

The duly elected jurisdiction-wide councils made up the RAB for the Conventional Public Housing Program. These resident leaders act as the RAB for the public housing program. All meetings were open to the public.

(The schedule for these meetings is available on HACLA's web-site.)

As part of the Annual Plan process, the SFHA held meetings at various locations that were easily accessible to the RAB members. The meetings consisted of informational presentations about the Agency Plan and gave an opportunity for RAB members to provide input on its contents.

Admission & De-concentration Policy

- Annually, the Housing Authority will analyze the incomes of families residing in each of the developments, the income levels of the census tracts in which the developments are located and the income levels of families on the waiting list.
- Based on this analysis, the Housing Authority will determine the level of marketing strategies and which de-concentration incentives to implement.
- The Housing Authority will affirmatively market its housing to all eligible income groups.

Applicants will not be steered to a particular site based solely on the family's Income.

- The de-concentration policy, and any incentives adopted in the future, will be applied in a consistent and non-discriminatory manner.
- The Housing Authority shall provide in its Annual Plan an analysis of De-concentration and Income Mixing for each fiscal year. The analysis will identify those sites whose average incomes are below 85 percent and above 115 percent the Authority's average income for covered properties. Incomes that are above 115 percent of the Authority's average but still below 30% of the area median income shall not be considered "higher income." The analysis shall provide explanations as to why sites are outside of the 85 percent to 115 percent range and strategies the Authority will implement to address if needed.

Section 7.0

Hope VI, Mixed Finance Modernization Or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-Based Vouchers.

Mixed Finance Modernization

The SFHA is undertaking an ambitious initiative to rehabilitate 902 units at four developments: Ping Yuen (234 units), Ping Yuen North (194 units), Rose Parks (198 units) and Clementina Towers (276 units). Ping Yuen and Ping Yuen North are general occupancy public housing developments, while Rosa Parks and Clementina Towers are elderly/disabled occupancy public housing developments. SFHA is submitting a public housing disposition application covering these developments. Upon approval, SFHA will seek tenant protection vouchers and will seek, subject to compliance with HUD requirements, to project-base vouchers at the four sites except as explained below. SFHA can leverage rehabilitation funds through a combination of borrowing against the properties' rental income and equity raised through syndication of 4% tax credits. SFHA estimates that it will be able to leverage approximately \$59 million for comprehensive rehabilitation of these four developments.

Mixed Finance Development

The SFHA has developed revitalization and replacement housing plans for eleven sites that it manages. The extent of the physical problems, the inappropriateness of site and building design, obsolescence of systems and limited funding for modernization makes revitalization an appropriate long-term strategy. In addition, the relatively low density of these sites provides an opportunity for redevelopment into mixed income communities that include one-for-one replacement of the public housing. The SFHA will pursue partnerships with developers and city agencies and secure funding including Replacement Housing Factor, HOPE VI, other HUD funding, private financing, and State and local funding for these mixed-finance developments. The SFHA also plans to use the project-based voucher program as part of the financing for approximately forty percent of the replacement public housing units. The SFHA has had enormous success with this strategy at five HOPE VI sites that now have new public housing in developments with a total of 1,148 mixed-income units.

Phase 1 of the process at Hunters View is well underway. HUD has approved Demolition/Disposition for this portion of the site, the area has been cleared, financing has been secured, and SFHA and the developer partners have begun vertical construction. SFHA is also working with McCormack Baron Salazar on the redevelopment of Alice Griffith. Planning and environmental approvals are being processed and the site has been selected for a Choice Neighborhood grant. SFHA will continue with planning for and redevelopment of the rest of Hunters View, Alice Griffith and the ten remaining obsolete and dilapidated low density family sites with potential for one-for-one replacement of the public housing plus other affordable, first-time homebuyer, and market housing. These sites include Potrero Terrace, Potrero Annex,

Sunnydale, Velasco, and Westside Courts. The SFHA is negotiating with the selected development teams for the revitalization of these sites. The revitalization of these communities is a priority for the San Francisco Redevelopment Agency's plan, the City's Consolidated Plan, the Housing Element, and the Mayor's HOPE SF Task Force. Redevelopment potential is also being evaluated for Hunters Point East, Hunters Point West, Westbrook and Alemany.

Section 7.0 Continued

The SFHA released Requests for Qualifications for developers to rebuild these sites in 2003 and 2007. In the fall of 2006, San Francisco's Mayor Gavin Newsom and Supervisor Sophie

Maxwell selected a broad-based task force to provide recommendations for addressing conditions in San Francisco's most distressed public housing while also enhancing the lives of its current residents based on the successful HOPE VI model.

The HOPE SF Task Force developed the guidelines outlined below as major initiatives for funding, collaboration, and partnership. The SFHA's revitalization and disposition priorities are consistent with these guidelines.

HOPE SF Task Force Vision

"To Rebuild our most distressed public housing sites, while increasing affordable housing and ownership opportunities, and improving the quality of life for existing residents and the surrounding communities"

HOPE SF Task Force Principles

1. Ensure No Loss of Public Housing:
2. Create an Economically Integrated Community:
3. Maximize the Creation of New Affordable Housing:
4. Involve Residents in the Highest Levels of Participation in Entire Project:
5. Provide Economic Opportunities Through the Rebuilding Process:
6. Integrate Process with Neighborhood Improvement Plans:
7. Create Environmentally Sustainable and Accessible Communities:
8. Build a Strong Sense of Community:

HOPE SF Task Force Strategies for Funding

The Authority along with the San Francisco Mayor's Office of Housing have analyzed this rebuilding opportunity to determine the financial feasibility of the approach outlined by the Task Force. Below are the assumptions and resulting cost projects and financing gaps.

Key Financial Assumptions:

- All of the public housing would be rebuilt on-site;
- Rebuilding would occur in phases so that relocation could occur on-site;
- Market-rate housing would cross-subsidize the rebuilding of the public housing;
- The developments would be rebuilt to 40 units per acre or more depending on the density of the surrounding neighborhood; and
- The final mix of housing on the sites would be approximately 40% public housing, 40% market-rate and 20% affordable rental and ownership housing

Section 7.0 Continued

HOPE SF Key Next Steps

These are the next steps to be undertaken to move this plan forward and address the most blighted and obsolescent sites:

1. Expand the outreach and education process with public housing residents and other stakeholders.
2. Seek \$100 to \$200 million in new local funding for an aggressive first phase of HOPE SF.
3. Secure funding for services, outreach, job training and school improvement independently of individual project financing.

Demolition and/or Disposition

Mixed Finance Development/Site Revitalization Project Information: All dispositions under long term ground leases with SFHA option to purchase improvements after tax credit compliance period - RHF, HOPE VI, Project Based Voucher, and other HUD funding combined with public and private funding.

- Hunters View, AMP 974, 275 public housing units –2009 through 2016. Phased Demolition/Disposition.
- Potrero Terrace, AMP 967, 469 public housing units –2011through 2016. Phased Demolition/Disposition.
- Potrero Annex, AMP 971, 159 public housing units – 201 through 2016. Phased Demolition/Disposition
- Westside Courts, AMP 969, 136 public housing units – 2011-2016. Phased Demolition/Disposition.
- Sunnydale, AMP 968, 767 public housing units – 2012-2018. Phased Demolition/Disposition.
- Velasco, AMP 968, 18 public housing units – 2012-2018. Phased Demolition/Disposition.
- Alice Griffith, AMP 975, 256 public housing units – 2011-2016. Phased Demolition/Disposition.
- Westbrook, AMP 970, 226 public housing units – 2013-2018. Phased Demolition/Disposition.
- Hunters Point East, AMP 973, 80 public housing units – 2013-2018. Phased Demolition/Disposition.
- Hunters Point West, AMP 973, 133 public housing units – 2013-2018. Phased Demolition/Disposition.
- Alemany, AMP 966, 158 public housing units – 2013-2018. Phased Demolition/Disposition

The Authority is now implementing some of these more detailed strategies with developer partners, City agencies, residents, and community groups. Site-specific community advisory teams composed of residents and the surrounding communities are being engaged in the pre-development process with already selected and engaged development teams.

Section 7.0 Continued

Disposition Project Information – Properties with Underutilized Portions of Sites

- Rosa Parks, AMP 978, open parking area adjacent to the 198 public housing units – long term ground lease for development of housing for senior and/or disabled households 2009-2012.
- 1750 McAllister, AMP 985, open parking area adjacent to the 97 public housing units – fee simple sale or long term ground lease in partnership with developer or at fair market value.

Mixed Finance Modernization Disposition to Partnerships With SFHA Affiliate Managing General Partner: All dispositions will be under long term ground leases with SFHA option to purchase improvements after tax credit compliance period. CFFP, project-basing of replacement vouchers, bond, 4% low income housing tax credits combined with other public and private financing strategies are being pursued.

Potential Sites

- Clementina Towers, AMP 983, 276 public housing units – 2011-2013.
- Ping Yuen, AMP 972, 234 public housing units – 2011-2013.
- Ping Yuen North, AMP 976, 194 public housing units – 2011-2013.
- Rosa Parks, AMP 978, 198 public housing units – 2011-2013.

Other Potential Sites

- 350 Ellis and 666 Ellis, AMP 981, 196 public housing units – 2011-2013.
- Holly Courts and Alemany, AMP 966, 276 public housing units – 2011-2013.
- Great Highway, 4101 Noriega, 200 Randolph, AMP 985, 40 public housing units – 2011-2013.

Conversion of Public Housing under HUD Demonstration Program

In 2011 the Department of Housing and Urban Development developed the Rental Assistance Demonstration designed to preserve public housing and enhance housing choice for residents. Under this program, public housing agencies could have the option of signing long-term project-based voucher or project-based rental assistance contracts instead of their current public housing Annual contributions Contracts. PHAs could then secure financing from private and not-for-profit partners to repair and renovate their property, including energy-efficient upgrades. See below for potential target sites:

- AMPS 966, 972, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987 and 988

Homeownership Programs

The SFHA administers a Homeownership program for HCV but does not currently have one for public housing.

Project Based Vouchers (PBV)

The project-based voucher (PBV) program allows PHAs that already administer a tenant-based voucher program under an annual contributions contract (ACC) with HUD to take up to 20 percent of its voucher program budget authority and attach the funding to specific units rather than using it for tenant-based assistance [24 CFR 983.6].

The PHA will operate a project-based voucher program using up to the HUD allowed limit of its budget authority, currently 20 percent, for project-based assistance. PBV assistance may be attached to existing housing or newly constructed or rehabilitated housing [24 CFR 983.52].

The PHA must select PBV proposals in accordance with the selection procedures in the PHA administrative plan. The PHA must select PBV proposals by either of the following two methods.

PHA request for PBV Proposals (Competitive) -- The PHA may solicit proposals by using a request for proposals to select proposals on a competitive basis in response to the PHA request. The PHA may not limit proposals to a single site or impose restrictions that explicitly or practically preclude owner submission of proposals for PBV housing on different sites.

The PHA may select proposals that were previously selected based on a competition (Non-Competitive). -- This may include selection of a proposal for housing assisted under a federal, state, or local government housing assistance program that was subject to a competition in accordance with the requirements of the applicable program, community development program, or supportive services program that requires competitive selection of proposals (e.g., HOME, and units for which competitively awarded LIHTCs have been provided), where the proposal has been selected in accordance with such program's competitive selection requirements within three years of the PBV proposal selection date, and the earlier competitive selection proposal did not involve any consideration that the project would receive PBV assistance.

Mixed-Finance Modernization - see above

Mixed Finance Development/Revitalization – see above

HUD Initiative to Convert Public Housing to HCV PBV – HUD is implementing a program under current law to assist with the conversion of public housing to project-based vouchers, through means such as award of tenant protection vouchers at the same time as disposition applications are approved and waivers that would facilitate such conversions. SFHA plans on pursuing it for the most suitable properties, including but not limited to:

- Ping Yuen and 227 Bay Street, AMP 972, 285 public housing units – 2011-2013
- Ping Yuen North and 990 Pacific, AMP 976, 286 public housing units – 2011-2013
- 1760 Bush, and 1880 Pine, AMP 977, 221 public housing units – 2011-2013
- Rosa Parks and Joan San Jules, AMP 978, 206 public housing units – 2011-2013

HUD Initiative to Convert Public Housing to HCV PBV – (cont.)

- Woodside Gardens, AMP 979, 110 public housing units – 2011-2013.
- Mission Dolores and 363 Noe, AMP 980, 114 public housing units – 2011-2013

- *101/03 Lundy Lane, AMP 982, 2 public housing units – 2011-2013*
- *Clementina Towers, AMP 983, 183 public housing units – 2011-2013*
- *JFK towers and 2698 California, AMP 984, 138 public housing units – 2011-2013*
- *1750 McAllister, 4101 Noriega, 200 Randolph, and 2206-2268 Great Highway, AMP 985, 137 public housing units – 2011-2013*
- *25 Sanchez, 345 Arguello, 462 Duboce and 491 31st Avenue, AMP 986, 277 public housing units – 2011-2013*
- *951 Eddy Street, AMP 987, 26 public housing units – 2011-2013*

Veterans Affairs Supportive Housing (VASH) -

Project-based vouchers are an appropriate option promoting access to affordable housing to veterans and homeless veterans with multiple barriers or special need requirements. The PHA will project-base VASH vouchers as needed to meet the needs of veterans.

Mixed-Finance Modernization - see above

Mixed Finance Development/Revitalization – see above

8.0 Capital Improvements

Plan Describing the Capital Improvements Necessary to Ensure Long-term Physical and Social Viability of the Projects

This Narrative sets forth the San Francisco Housing Authority (SFHA) overall plan for modernization, new construction, and revitalization of public housing with highlights of the proposed 2012 Capital Fund Program (CFP) and Replacement Housing Factor (RHF) program. The SFHA has involved residents, community representatives and City agencies throughout this planning process.

8.1 Introduction

The SFHA is the largest landlord in the City of San Francisco. With over 6,200 public housing units and over 7,000 Section 8 Voucher holders it is the primary sources of housing for very low-income households. Operating subsidies and modernization funds provided by the Federal government on an annual basis have not been adequate, resulting in obsolescence and deterioration at many properties. Increased Federal support, innovative local financing techniques, energy conservation measures, property management and maintenance transition to Asset Management, resident involvement, and economic opportunities for residents are critical for improving this valuable supply of affordable housing. Long-range plans are being pursued to rebuild several sites into mixed-income communities and make better use of underutilized sites and portions of sites.

8.2 Identification of Physical and Management Needs

(based on the 2007 Comprehensive Physical and Management Needs Assessments as updated in 2009 with resident and staff input):

The SFHA is continually evaluating physical and management needs for all forty-six public housing developments. The identification process started in 1990 with the hiring of two consulting firms to prepare formal physical and management needs assessments. These original Management and Physical Assessment Plans were presented in the 1991 CGP Submittal. In 1997 they were updated with the guidance and assistance of the U.S. Department of Housing and Urban Development (HUD) Intervention and Recovery Teams.

In 2002, a new, Comprehensive Physical Needs Assessment was developed with input from residents, resident organizations, and SFHA staff in an effort led by the Consultant, DLR Group. The DLR Group was hired back in 2007 to update the Needs Assessment with more current information. The review and prioritizing of the 2009 needs assessment was completed with

input from the RAB in 2009 comprised of Resident leaders, Residents, and Staff members.

The SFHA's 2009 Comprehensive Physical Needs Assessment determined the immediate needs of modernization needs to be \$269 M, up \$74 M from the 2002 estimated needs of \$195 M.

Since over \$35 M in capital improvements were made during this period, the annual accrual rate of needs has been about \$15 M per year. Since the HUD funds available for modernization were a little over \$5 M per year, SFHA projected that the developments would continue to deteriorate unless significant intervention occurred with leveraged financing for rehabilitation and redevelopment of the most distressed sites. This trend has been significantly forestalled with a \$17.9 M American Reinvestment and Recovery Act grant and \$15.5 M in Capital Fund Recovery Act competitive grant funds.

In 2005 the SFHA contracted the Nelrod Company to perform a Qualified Energy Audit in accordance with the methodology presented in HUD publications "HUD Rehabilitation Energy Guidelines for Multi-Family Dwellings" (1996), "HUD Rehabilitation Energy Guidelines for One to Four Family" (Sept. 1996), and "Energy Conservation for Housing: A Workbook (1998). In an effort to improve the energy efficiency of its properties and finance energy related capital improvements, the SFHA prepared an Energy Plan in 2007 and in 2008, selected an Energy Services Company for Energy Performance Contracting. In March 2009, Ameresco completed an Energy Audit Report that is the basis for an Energy Services Contracting program that was financed in 2010 and is now being implemented.

8.3 Capital Fund Program Plans for FY 2012

The Physical Improvements planned for FY 2012 focus on completion of capital improvements in progress, urgently needed work, and mandated improvements, and energy conservation measures where cost effective:

- Urgently needed infrastructure improvements including: water main replacement; heating, plumbing, and boiler replacements; site electrical improvements; concrete restoration; roofing; waterproofing; and paving repairs.
- Interior unit upgrades including: kitchen sink and countertop replacement; range, refrigerator and cabinet replacement; asbestos, lead and mold abatement; and 504/ADA reasonable accommodations.

Modernization of senior and family developments including: elevator upgrades; hardwire carbon monoxide/smoke detector installations; fire alarm system upgrades, accessibility modifications; sidewalk repairs; exterior painting; and common space improvements.

SFHA is also pursuing cost effective opportunities for saving energy, subject to fund availability, through work items such as equipment replacement, appliance procurement, and significant renovations to units and buildings. Work also includes:

Section 8.3 Continued

- Heating/cooling/DHW/distribution system replacements
- Replacement and upgrades to mechanical systems with high maintenance operational costs PHA- Wide
- Lighting improvements
- Window replacements
- Showerhead, toilet, and faucet replacements
- Central laundry improvements

The Management Improvements (MI) goals include security and police protection, and public housing authority (SFHA-wide) computer hardware and system upgrades.

The proposed work for the 2012 CFP complements and completes tasks in progress that are part of the 2011 CFP outlined below:

- Exterior and interior stabilization of lead based paint, site improvements at family developments, and asbestos abatement at senior and family developments
- 504/ADA (Americans with Disabilities Act) accessibility modifications to apartments and common spaces and continuing upgrades to both senior and family developments
- Major work to be completed: boiler and hot waterline replacement; heating system improvements; waterproofing and structural repairs; window replacement; exterior painting; security gate and lighting improvements; disability modifications to apartments and common areas; range and refrigerator replacement; asbestos removal; utility line replacement; and site improvements
- Elevator repair and upgrades; fire alarm system and hardwire smoke detector installation; and at senior developments, stand by generator installations
- Vacant unit rehabilitation: vacancy reduction is one of the main focus for the 2012 CFP. The SFHA will complete the units included in Phase II work plan and will start the Phase III work plan. Below are the units included in both phases. The SFHA will also conduct rehabilitation on any unit that may become vacant during this fiscal year.

PHASE II UNITS UNDER MODERNIZATION

FOR THE PERIOD JULY 1, 2011 TO JUNE 30, 2012

Devt#	Building No.	Building Entrance #	Unit#	SITE/ADDRESS
HOLLY COURT				
CA001000966	0103	7	010148	148 Appleton
CA001000966	0110	7	010083	83 Patton
CA001000966	0109	9	010247	147A Highland
COUNT: 3				
ALEMANY				
CA001000966	1120	1	110512	512 Alemany Blvd
CA001000966	1113	4	110566	566 Alemany Blvd
CA001000966	1118	4	110906	906 Ellsworth St
CA001000966	1111	2	110959	959 Ellsworth St
CA001000966	1103	2	110972	972 Ellsworth St
CA001000966	1103	3	110974	974 Ellsworth St
CA001000966	1109	1	110987	987 Ellsworth St
CA001000966	1125	1	110817	817 Ellsworth St
CA001000966	1122	8	110875	875 Ellsworth St
ALEMANY (Cont.)				
CA001000966	1118	4	110906	906 Ellsworth St
CA001000966	1108	4	110922	922 Ellsworth St
CA001000966	1104	3	110962	962 Ellsworth St
CA001000966	1109	6	110997	997 Ellsworth St
COUNT: 13				
POTRERO TERRACE				
CA001000967	0205	1	020170	950 Connecticut
CA001000967	0255	1	020145	1032 Connecticut
CA001000967	0255	1	020148	1038 Connecticut
CA001000967	0255	1	020287	1043 Connecticut
CA001000967	0253	1	020132	1082 Connecticut
CA001000967	0206	1	020193	934 Connecticut
CA001000967	0209	1	020239	937 Connecticut
CA001000967	0205	1	020172	954 Connecticut
CA001000967	0205	1	020176	962 Connecticut
CA001000967	0204	1	020155	1000 Connecticut
CA001000967	0204	1	020156	1002 Connecticut
CA001000967	0204	1	020157	1004 Connecticut
CA001000967	0204	1	020158	1006 Connecticut
CA001000968	0205	2	020159	1008 Connecticut

CA001000969	0206	3	020160	1010 Connecticut
CA001000967	0211	1	020279	1023 Connecticut
CA001000967	0204	1	020168	1026 Connecticut
CA001000967	0255	1	020290	1049 Connecticut
CA001000967	0233	1	020137	1054 Connecticut
CA001000967	0233	1	020143	1066 Connecticut
CA001000967	0253	1	020128	1074 Connecticut
CA001000967	0253	1	020134	1086 Connecticut
CA001000967	0250	9	020056	1116 Connecticut
CA001000967	0240	1	020038	1130 Connecticut
				1051 Connecticut
CA001000967	0215	1	020413	27 Dakota St
CA001000967	0215	1	020423	47 Dakota St
CA001000967	0214	1	020366	60 Dakota St
CA001000967	0216	1	020434	73 Dakota St
CA001000967	0214	1	020377	82 Dakota St
CA001000967	0213	1	020356	110 Dakota St
				150 Dakota St
CA001000967	0218	1	020461	157 Dakota St
ca001000967	0218	1	020465	165 Dakota St
POTRERO TERRACE (Cont.)				
CA001000967	0243	1	020316	1622 25Th Street
CA001000967	0247	1	020027	1720 25Th Street
CA001000967	0202	2	020060	1803 25Th Street
CA001000967	0202	10	020068	1819 25Th Street
CA001000967	0203	3	020095	1868 25Th Street
CA001000967	0203	1	020104	1886 25Th Street
CA001000967	0230	7	020091	1913 25th Street
CA001000967	0207	1	020209	1003 Wisconsin
COUNT: 42				

SUNNYDALE				
CA001000968	0302	4	030012	1930 Sunnydale
CA001000968	0309	3	030091	1752 Sunnydale
CA001000968	0318	8	030157	1514 Sunnydale
CA001000968	0319	8	030172	1515 Sunnydale
CA001000968	0322	2	030222	1635 Sunnydale
CA001000968	0344	7	030271	1837 Sunnydale
CA001000968	0347	6	030302	1935 Sunnydale
CA001000968	0348	1	030309	1949 Sunnydale
CA001000968	0338	6	030342	11 Santos

CA001000968	0366	6	030384	60 Santos
CA001000968	0365	7	030395	32 Santos
CA001000968	0339	6	030404	12 Santos
CA001000968	0351	6	030431	60 Brookdale
CA001000968	0355	8	030468	158 Brookdale
CA001000968	0375	3	030481	169 Brookdale
CA001000968	0375	2	030482	167 Brookdale
CA001000968	0375	5	030479	173 Brookdale
CA001000968	0329	6	030565	12 Blythdale
CA001000968	0329	8	030567	16 Blythdale
CA001000968	0387	3	030747	49 Blythdale
CA001000968	0367	3	030614	124 Blythdale
CA001000968	4802	6	480806	612B Velasco
CA001000968	0390	1	030765	1 Blythdale
CA001000968	0381	6	030708	157 Blythdale
CA001000968	0303	12	030028	1922 Sunnydale
CA001000968	4802	7	480807	616A Velasco
CA001000968	0389	4	030760	23 Blythdale
CA001000968	0367	1	030612	120 Blythdale
CA001000968	0349	8	030417	16 Brookdale
SUNNYDALE (Cont.)				
CA001000968	0353	1	030442	100 Brookdale
CA001000968	0360	5	030504	109 Brookdale
CA001000968	0354	6	030456	132 Brookdale
CA001000968	0354	7	030457	134 Brookdale
CA001000968	0374	3	030489	149 Brookdale
CA001000968	0319	5	030169	1509 Sunnydale
CA001000968	0342	7	030255	1763 Sunnydale
CA001000968	0308	8	030084	1786 Sunnydale
CA001000968	0305	1	030041	1848 Sunnydale
CA001000968	0302	4	030012	1930 Sunnydale
CA001000968	0347	7	030303	1937 Sunnydale
CA001000968	0347	12	030308	1947 Sunnydale
CA001000968	0348	11	030319	1969 Sunnydale
COUNT: 42				
WESTSIDE COURTS				
CA001000969	0602	2	060215	1434 Baker #215
CA001000969	0604	8	060241	1515 Broderick # 241
CA001000969	0603	15	060223	2474 Post #223
CA001000969	0603	22	060321	2486 Post #321
CA001000969	0603	23	060120	2492 Post St #120

CA001000969	0601	23	060332	2529 Sutter #332
CA001000969	0605	12	060328	2551 Sutter #328
CA001000969	0605	13	060129	2553 Sutter #129
COUNT: 8				
WESTBROOK APTS.				
CA001000970	0736	6	070150	29 Harbor
CA001000970	0714	3	070011	5 Northridge
				6 Northridge
CA001000970	0713	6	070022	12 Northridge
CA001000970	0719	5	070053	51 Northridge
CA001000970	0732	3	070181	104 Kiska
CA001000970	0701	4	070176	60 Harbor
CA001000970	0727	4	070198	138 Kiska
CA001000970	0713	4	070020	8 Northridge
CA001000970	0723	4	070078	73 Northridge
CA001000970	0725	4	070088	81 Northridge
CA001000970	0706	2	070090	84 Northridge
COUNT: 12				

POTRERO ANNEX				
CA001000971	0801	5	080005	9 Turner Terrace
CA001000971	0809	1	080021	43 Turner Terrace
CA001000971	0811	1	080038	42 Turner Terrace
CA001000971	0810	1	080024	53 Turner Terrace
CA001000971	0820	1	080078	766 Missouri
COUNT: 5				
PING YUEN				
CA00100972	1004	1	100636	895 Pacific Ave. #636
COUNT: 1				
HUNTERS POINT A (EAST & WEST)				
CA001000973	1217	6	120203	1075 Oakdale H
CA001000973	1211	6	120132	1010 Griffith
CA001000973	1209	11	120112	780 Kirkwood Apt. L
CA001000973	1205	2	120069	729 Jerrold
CA001000973	1208	10	120097	750 Kirkwood Apt. K
CA001000973	1202	2	120033	770 Jerrold E
CA001000973	1202	5	120036	770 Jerrold Apt. H
CA001000973	1211	5	120131	1008 Griffith
CA001000973	1218	2	120214	1093 Oakdale

CA001000973	1216	8	120176	1015 Oakdale Apt. K
COUNT: 10				
HUNTERS VIEW				
CA001000974	1542	2	150306	43 Middle Point Rd
CA001000974	1545	5	150325	81 Middle Point Rd
CA001000974	1555	2	150343	139 Middle Point Rd
CA001000974	1512	3	150074	116 West Point Rd
CA001000974	1516	2	150089	148 West Point
CA001000974	1519	2	150105	180 West Point Rd
CA001000974	1546	2	150203	212 West Point Rd
CA001000974	1548	1	150208	224 West Point Rd
				227 West Point Rd
				229 West Point Rd
CA001000974	1551	4	150197	243 West Point Rd
CA001000974	1548	4	150211	230 West Point Rd
CA001000974	1540	1	150239	27 Wills St
CA001000974	1540	3	150241	31 Wills St
CA001000974	1540	4	150242	33 Wills St
COUNT: 15				

ALICE GRIFFITH				
CA001000975	1612	3	160125	6 Cameron Way
CA001000975	1613	1	160133	30 Cameron Way
CA001000975	1635	7	160198	41 Cameron Way
				61 Cameron Way
CA001000975	1619	2	160176	152 Cameron Way
CA001000975	1642	3	120217	155 Cameron Way
CA001000975	1640	1	160347	100 Double Rock
CA001000975	1624	1	160105	2462 Griffith
CA001000975	1624	5	160109	2484 Griffith
CA001000975	1623	1	160113	2500 Griffith
CA001000975	1628	5	160239	29 Nichols
CA001000975	1631	1	160254	71 Nichols
CA001000975	1626	3	160189	5 Cameron
CA001000975	1612	4	160126	8 Cameron Way
CA001000975	1635	2	160193	31 Cameron Way
CA001000975	1636	4	160206	61 Cameron Way
CA001000975	1616	5	160153	78 Cameron Way
CA001000975	1617	1	160157	100 Cameron Way

CA001000975	1628	4	160238	27 Nichols
CA001000975	1627	7	160233	15 Nichols
COUNT: 20				
ROSA PARKS				
CA00100978	1701	1	170611	1251 Turk st # 611
CA00100978	1701	1	170318	1251 Turk st # 318
CA00100978	1701	1	170214	1251 Turk st # 214
COUNT: 3				
350 ELLIS AND 666 ELLIS				
CA001000981	2501	1	250101	350 Ellis # 1A
CA001000981	2501	1	250108	350 Ellis # 1H
CA001000981	2501	1	250201	350 Ellis # 2A
CA001000981	2501	1	250301	350 Ellis # 3A
CA001000981	2501	1	250401	350 Ellis # 4A
CA001000981	2501	1	250402	350 Ellis # 4B
CA001000981	2501	1	250408	350 Ellis # 4H
CA001000981	2501	1	250501	350 Ellis # 5A
CA001000981	2501	1	250502	350 Ellis # 5B
CA001000981	2501	1	250504	350 Ellis # 5D
CA001000981	2501	1	250505	350 Ellis # 5E
CA001000981	2501	1	250506	350 Ellis # 5F
CA001000981	2501	1	250507	350 Ellis # 5G
350 ELLIS AND 666 ELLIS (Cont.)				
CA001000981	2501	1	250508	350 Ellis # 5H
CA001000981	2501	1	250601	350 Ellis # 6A
CA001000981	2501	1	250602	350 Ellis # 6B
CA001000981	2501	1	250705	350 Ellis # 7E
CA001000981	3201	1	321204	666 Ellis # 1204
COUNT: 18				
ROBERT B. PITTS				
CA001000988	5118	1	510110	1108 Scott St
CA001000988	5112	1	510302	1624 Turk St
CA001000988	5137	1	510358	1762 Turk St
CA001000988	5133	1	510144	1121 Scott St
CA001000988	5111	1	510358	1115 Pierce St
COUNT: 5				
GRAND TOTAL : 197				

**PHASE III UNITS UNDER MODERNIZATION
FOR THE PERIOD JULY 1, 2011 TO JUNE 30, 2013**

Devt#	Building No.	Building Entrance #	Unit#	SITE/ADDRESS
HOLLY COURT				
CA001000966	0103	10	010154	154 Appleton
CA001000966	0104	6	010166	166 Appleton
CA001000966			010174	174 Appleton
CA001000966	0105	10	010192	192 Appleton
CA001000966	0105	12	010196	196 Appleton
CA001000966			010245	145A Highland
COUNT: 6				
ALEMANY				
CA001000966			110516	516 Alemany
CA001000966			110564	564 Alemany
CA001000966			110566	566 Alemany
CA001000966			110995	995 Ellsworth St
CA001000966			110512	512 Alemany
CA001000966			110855	855 Ellsworth
CA001000966	1103	9	110986	986 Ellsworth St
COUNT: 7				
POTRERO TERRACE				
CA001000967	0203	1	020102	1882 25Th Street
CA001000967	0215	1	020411	23 Dakota St
CA001000967	0251	2	020002	1257 Wisconsin
CA001000967	0202	8	020066	1815 25Th Street
CA001000967	0252	7	020080	1847 25Th Street
CA001000967	0203	7	020099	1876 25th Street
CA001000967	0206	1	020189	926 Connecticut
CA001000967	0206	1	020195	938 Connecticut
CA001000967	0206	1	020198	944 Connecticut
CA001000967	0210	1	020256	973 Connecticut
CA001000967	0233	1	020138	1056 Connecticut
CA001000967	0241	1	020294	1061 Connecticut
CA001000967	0257	11	020022	1826 26th Street
CA001000967	0235	1	020402	1 Dakota St
CA001000967	0245	1	020388	44 Dakota St
CA001000967	0216	1	020433	71 Dakota St

CA001000967	0213	1	020355	108 Dakota St
CA001000967	0212	1	020340	148 Dakota St
CA001000967	0207	1	020214	1013 Wisconsin
COUNT: 19				
SUNNYDALE				
CA001000968	0310	2	030102	1726 Sunnydale
CA001000968	0350	2	030419	32 Brookdale
CA001000968	0360	8	030507	115 Brookdale
CA001000968	0354	10	030460	140 Brookdale
CA001000968	0321	1	030229	1651 Sunnydale
CA001000968	0342	2	030250	1753 Sunnydale
CA001000968	0308	11	030087	1792 Sunnydale
CA001000968	0303	3	030019	1904 Sunnydale
CA001000968	0387	4	030748	51 Blythdale
CA001000968	4802	7	480807	616A Velasco
CA001000968	0317	2	030322	172 Hahn
CA001000968	0339	3	030407	6 Santos
CA001000968	0349	5	030414	10 Brookdale
CA001000968	0363	1	030536	25 Brookdale
CA001000968	0363	5	030540	33 Brookdale
CA001000968	0351	3	030428	54 Brookdale
CA001000968	0361	12	030523	95 Brookdale
CA001000968	0353	2	030443	102 Brookdale
SUNNYDALE (Cont.)				
CA001000968	0389	5	030761	25 Blythdale
CA001000968	0330	8	030575	32 Blythdale
CA001000968	0387	6	030750	55 Blythdale
CA001000968	0335	1	030600	82 Blythdale
CA001000968	0382	4	030718	127 Blythdale
CA001000968	0382	7	030721	133 Blythdale
CA001000968	0367	8	030619	134 Blythdale
CA001000968	0369	1	030628	160 Blythdale
CA001000968	0327	2	030174	1521 Sunnydale
CA001000968	0314	4	030145	1546 Sunnydale
CA001000968	0325	5	030193	1559 Sunnydale
CA001000968	0309	2	030090	1750 Sunnydale
CA001000968	0342	2	030250	1753 Sunnydale
CA001000968	0309	6	030094	1758 Sunnydale
CA001000968	0307	8	030072	1814 Sunnydale
CA001000968	0306	11	030063	1844 Sunnydale

CA001000968	0305	2	030042	1850 Sunnydale
CA001000968	0304	12	030040	1894 Sunnydale
CA001000968	0303	8	030024	1914 Sunnydale
COUNT: 37				
WESTBROOK APTS.				
CA001000970	0712	2	070002	849 Innes
CA001000970	0712	4	070004	853 Innes
CA001000970	0704	2	070154	16 Harbor
CA001000970	0736	5	070149	27 Harbor
CA001000970	0702	4	070170	48 Harbor
CA001000970	0714	4	070012	7 Northridge
CA001000970	0710	5	070047	38 Northridge
CA001000970	0719	6	070054	53 Northridge
CA001000970	0729	1	070101	101 Northridge
COUNT: 9				
POTRERO ANNEX				
CA001000971	0820	1	080079	768 Missouri
CA001000971	08'08	1	080008	17 Turner Terrace
CA001000971	0813	1	080140	29 Watchman Way
CA001000971	0814	1	080141	31 Watchman Way
COUNT: 4				

HUNTERS POINT A (EAST & WEST)				
CA001000973	1208	1	120085	734 Kirkwood
CA001000973	1222	10	120311	1150 Palou #I
CA001000973	1212	5	120137	1022 Griffith
CA001000973	1213	2	120152	1032 Griffith
CA001000973	1216	11	120181	1021 Oakdale
CA001000973	1216	13	120183	1029 Oakdale
CA001000973	1220	8	120241	1165 Oakdale
CA001000973	1206	14	120285	1066 Palou
CA001000973	1205	9	120293	1088 Palou
CA001000973	1222	7	120308	1150 Palou #F
CA001000973	1205	4	120067	735 Jerrold
CA001000973	1203	1	120025	740 Jerrold
CA001000973	1204	1	120062	749 Jerrold
CA001000973	1202	3	120034	770 Jerrold #F
CA001000973	1208	11	120098	750 Kirkwood #H
CA001000973	1208	7	120094	750 Kirkwood #L

CA001000973	1209	6	120107	780 Kirkwood #G
CA001000973	1218	10	120125	790 Kirkwood #K
COUNT: 18				
HUNTERS VIEW				
CA001000974	1513	3	150078	124 West Point
COUNT: 1				
ALICE GRIFFITH				
CA001000975	1624	1	160125	2462 Griffith
CA001000975	1635	8	160199	43 Cameron Way
CA001000975	1612	10	160132	20 Cameron Way
CA001000975	1635	3	160194	33 Cameron Way
CA001000975	1616	6	160154	80 Cameron Way
CA001000975	1625	2	160098	2408 Griffith
CA001000975	1623	4	160116	2512 Griffith
CA001000975	1603	1	160301	1051 Fitzgerald
CA001000975	1602	4	160288	1007 Fitzgerald
COUNT: 9				
ROBERT B. PITTS				
CA001000988	5131	1	510132	1155 Scott
CA001000988	5126	1	510453	1851 Eddy
CA001000988	5113	1	510311	1638 Turk
COUNT: 37				
GRAND TOTAL : 113				

Section 8 Continued

8.4 Revitalization and Disposition

The SFHA has developed plans that are above and beyond the financial capacity of CFP and RHF through revitalization of the most obsolete public housing developments by leveraging public and private funding public housing, disposing of underutilized property to increase Authority resources, and replacing public housing subsidies with Project Based Vouchers. These plans are consistent with the City and County of San Francisco Consolidated Plan that identifies a serious shortage of affordable housing opportunities and need to maintain a stock of housing for very low-income households.

Revitalization plans for FY 2012

- Continue with redevelopment plans for four of the most obsolete and dilapidated low density family sites with potential for one-for-one replacement of the public housing plus other affordable, first-time homebuyer, and market housing, reducing the modernization need for Hunters View, Alice Griffith, Potrero Terrace/Potrero Annex, and Sunnydale/Velasco. The SFHA has had enormous success with this strategy at five HOPE VI sites that now has new public housing in developments with a total of 1,148 mixed-income units. The SFHA released Requests for Qualifications for developers to rebuild these sites in 2003 and 2007. The Hunters View family units in the Bayview Hunters Point southeast part of the City was selected as the first site to be revitalized, followed by Alice Griffith, Potrero Terrace/Potrero Annex and Sunnydale/Velasco. The SFHA, in partnership with the Mayor's Office of Housing and the San Francisco Redevelopment Agency, is negotiating with the selected development teams for the revitalization of these sites.
- Make available for development underutilized land areas at four developments (Rosa Parks, 1750 McAllister, JFK Towers and Woodside. Receiving compensation for making this land available for development would provide the Authority with resources to meet its immediate financial needs and leverage additional funds for capital improvements. The SFHA is negotiating with a development team that was selected to build up to 100 new apartments for senior and developmentally disabled households on an underutilized portion of the Rosa Parks site under a long term ground lease agreement with a prepaid capitalized ground lease payment. Improvements to the Rosa Parks site will be pursued in conjunction with the development of new housing.
- Apply for Rental Assistance vouchers for Public Housing sites and increase subsidy levels at properties that would benefit from increased revenue that could leverage private financing for improvements.

Resident hiring

For all contracts that are over a certain amount and subsidized with federal dollars, public housing residents will be hired for twenty-five percent of the workforce hours. Any contractors with the SFHA are required to provide resident hiring per these San Francisco

Housing Authority Policies and Section 3 federal MBE/WBE requirements.

8.5 Capital Fund Program Annual Statement/Performance and Evaluation Report

See Attachment 1.

8.6 Capital Fund Program Five-Year Action Plan

See Attachment 2.

8.7 Capital Fund Financing Program (CFFP).

Program is in planning stages.

9.0 Statement of Housing Needs

As of June 2012, there were 27,639 households on the public housing waiting list; the San Francisco Housing Authority manages 5,862 units of public housing. Seekers of public housing wait approximately ten years to be offered a unit.

As of June 2012, there were 10,797 households on the HCV waiting list. Seekers of a regular housing choice voucher wait approximately ten years to receive an available voucher.

Both the Conventional Public Housing and HCV waitlist are currently closed.

9.1 Strategies for Addressing Housing Needs

To ensure that Capital Fund Program (CFP) funding is effectively and efficiently utilized, a clear and appropriate set of program priorities, goals and objectives have been developed to serve as a guide in determining the specific work items and target sites that will be included in the CFP Plans. These program priorities, goals and objectives were discussed at the RAB meetings and used to develop this year's plans.

This overall strategy is consistent with the needs of SFHA and reflects the urgency of each work item and the priorities as identified by both residents and staff members of the RAB. The strategy also reflects those items that are mandated by law, local and federal regulations or previous commitments made by the SFHA. The strategy that has been developed for this program is in accordance to the needs identified in Section II.

Modernization and Management Improvement

Mandatory Physical & Management Improvements

- Lead Based Paint (LBP) abatement or in-place management activities.
- Asbestos Containing Material (ACM) abatement activities.
- Mold and Moisture abatement.
- Modification of apartments and common areas for use by disabled to comply with ADA and/or 504 requirements.
- Emergency improvements for life safety problems, and property stabilization by addressing leaking roofs and waterproofing building's exterior.
- Management improvement activities required by legal settlement, HUD audit finding, or identified by HUD's PHAS.
- Completion of Comprehensive modernization activities funded through CFP

Urgent Physical & Management Improvements

- a) Emergency improvements such as chronic malfunctioning elevators, correction of hazardous conditions, etc.
- b) Identification and proper abatement of potentially toxic materials and unhealthy conditions. Specific activities would include testing and abatement of asbestos, lead, chronic mildew, etc. Repair/replacement/installation of ventilation systems.

Section 9.1 Continued

- c) Improvements that will enhance the security of residents. Such activities would include installation of vandal resistant security lighting, security grills, surveillance equipment, gates, etc.
- d) Control of criminal activities. Such activities would include continuation of the successful public safety program of expanded patrols of San Francisco police officers at selective SFHA sites that have known criminal actives.

Serious Physical & Management Improvements

- Major repairs to heating, plumbing, sewer, electrical systems, etc.
- Physical improvements to non-dwelling space for the expansion or improvement of resident activities and services and SFHA management operations.
- Improvements to SFHA management operations to improve efficiency and the delivery of services to residents.

Coordinated Activities to Ensure Efficiency

When work items are to be completed at different times at one particular development, activities are sequenced to maximize efficiency. Building exteriors are not repainted until lead-based paint testing has been completed, for example. No completed work should have to be disturbed to address a subsequent non-emergency work item. This strategy may vary according to the condition of the building.

When special mobilization is required to address an item that is needed at several developments, the inclusion of all of these developments into a single effort will be considered.

Maintenance and management issues brought up at the RAB meetings and citywide public hearings shall be referred to the appropriate departments, including Maintenance and Management.

Remaining Physical, Management, and Other Needs

Remaining physical and management improvements are those that are addressed based on the severity of the problem, the efficiency of addressing the problem along with other more urgent items or on the cost savings that will result from completing the improvement.

- Management Issues - timely street cleaning, tree pruning, sidewalk repair, anti-vandalism strategies, appropriate trash collection system, proper cleaning of site, on-site security, site resident monitors, neighborhood programs to monitor loitering, recycling programs for each site, TA offices for the senior developments, and graffiti abatement, among others.
- Maintenance Issues- clean-up of playground facilities, better maintenance programs for elevators and boilers, availability of maintenance workers who live in the city during emergency calls, intercom systems for all the senior developments, new furnishings for public areas when needed, well maintained doors and windows, proper graffiti abatement,

Section 9.1 Continued

addition of weather stripping on all doors, addition of handrails to dangerous areas/ areas with seniors, add landscape irrigation system, timely maintenance response, kitchen cabinet repair, wall heater replacement, general unit improvements and need for new appliances, among others.

- Self-Sufficiency Issues - family planning services, senior care services, age-specific programs for children, summer programs, lunch programs, resident-owned businesses, social service programs, computer resource centers at all family developments and some senior developments, on-site activities/ programs for the senior developments, TA/ RMC

monitoring and coordination, monitoring of TA/ RMC elections process, resident involvement in the expenditure of programs such as DEP, etc., and transportation arrangements for seniors, among others.

Addressing Developments with Higher Needs

Where many serious improvements are needed and the repair, replacement or redesign of major building elements will require the temporary relocation of families to allow for the work to proceed, a comprehensive rehabilitation approach was developed. All-important physical problems will be addressed at that time, funding permitting to maximize the efficiency and long-range success, and to reduce overall cost associated with such efforts. When family relocation is not required and improvements can be completed without major disruptions, funding permitting, a sequenced rehabilitation approach will be followed.

The SFHA established an agency goal of pursuing every opportunity available to replace obsolete public housing units in San Francisco. The strategies propose the use of available public and private funding, creating alternative ways to rebuild public housing into mixed income communities and dispose of underutilized property to increase Authority resources. They are consistent with the City and County of San Francisco Consolidated Plan that identifies a serious shortage of affordable housing opportunities and need to maintain a stock of housing for very low-income households.

The Authority is now implementing some of these more detailed strategies with developer partners, City agencies, residents, and community groups. Site-specific community advisory teams composed of residents and the surrounding communities are being engaged in the pre-development process with already selected and engaged development teams.

Pursue Redevelopment Opportunities Through Disposition, Demolition and Reconstruction of the Most Obsolete Sites

Based On Obsolescence, High Capital improvements needs and identified potential for developing new mixed-income communities, these sites have been identified as opportunities for public housing replacement, affordable rental housing, first time homeownership units, and market rate housing.

Pursue Preservation, Modernization and in-Fill Housing (Long Term Ground Lease or Sale)

Section 9.1 Continued

Other Strategies

The SFHA's HCV program will maintain or increase lease-up rates by establishing payment standards which will enable families to rent throughout the City and County of San Francisco. It will continue to maintain or increase HCV lease-up rates by marketing the program to prospective landlords, especially those outside of areas of minority and poverty concentration. Finally, SFHA will maintain or increase HCV lease-up rates by effectively screening HCV applicants to increase acceptance of the HCV program.

The SFHA will also use the HCV Project-Based Voucher Program in conjunction with community revitalization efforts to increase the supply of affordable housing units.

For elderly persons and persons with disabilities the SFHA will apply for special purpose vouchers targeted to elderly and disabled people should they become available.

Section 10.0 Additional Information

10.1 Progress in Meeting Mission and Goals:

The SFHA has made progress in meeting its Five-Year Plan goals. **See Attachment 5.**

10.2. Significant Amendment and Substantial Deviation/Modification:

As mandated by the U.S. Department of Housing and Urban Development, the Housing Authority must define what a substantial change to the Agency Plan is. If a proposed change to the Agency Plan is considered a substantial change it must undergo a public process that includes: consultation with the Resident Advisory Board, a public comment period, public notification of where and how the proposed change can be reviewed, and approval by the Housing Authority Board of Commissioners. Therefore, the Housing Authority defines significant changes to the Agency Plan to be:

- Changes to tenant/resident admissions policies;
- Changes to the HCV termination policy;
- Changes to the tenant/resident screening policy;
- Changes to public housing rent policies;

Section 10.2 Continued

- Changes to the organization of the waiting list;
- Change in the use of replacement reserve funds under the Capital Fund;
- Change in regard to demolition, disposition, designation or conversion activities.

An exception to this definition will be made for any of the above that are adopted to reflect changes in HUD regulatory requirements; such changes will not be considered significant amendments by HUD.

10.3 Resident Membership on the PHA Governing Board

- The Board of Commissioners for the Housing Authority of the City of Los Angeles consists of seven members, two of which are required to be current residents. Of the two resident commissioners, one must represent the Family development community and the other must represent the Senior/Disabled community.
- Resident Commissioners are appointed by the Mayor of the City of San Francisco
- The resident commissioners are as follows:
 - Dorothy Smith
 - Micah Allen

10.4 Memorandum of Agreement with HUD

The SFHA does not have a memoranda of agreement with HUD.

Section 11.0 Required Submission for HUD Field Office Review

- a. Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations
- b. Form HUD-50070, *Certification for a Drug-Free Workplace* (PHAs receiving CFP grants only)
- c. Form HUD-50071, *Certification of Payments to Influence Federal Transactions* (PHAs receiving CFP grants only)
- d. Form SF-LLL, *Disclosure of Lobbying Activities* (PHAs receiving CFP grants only)

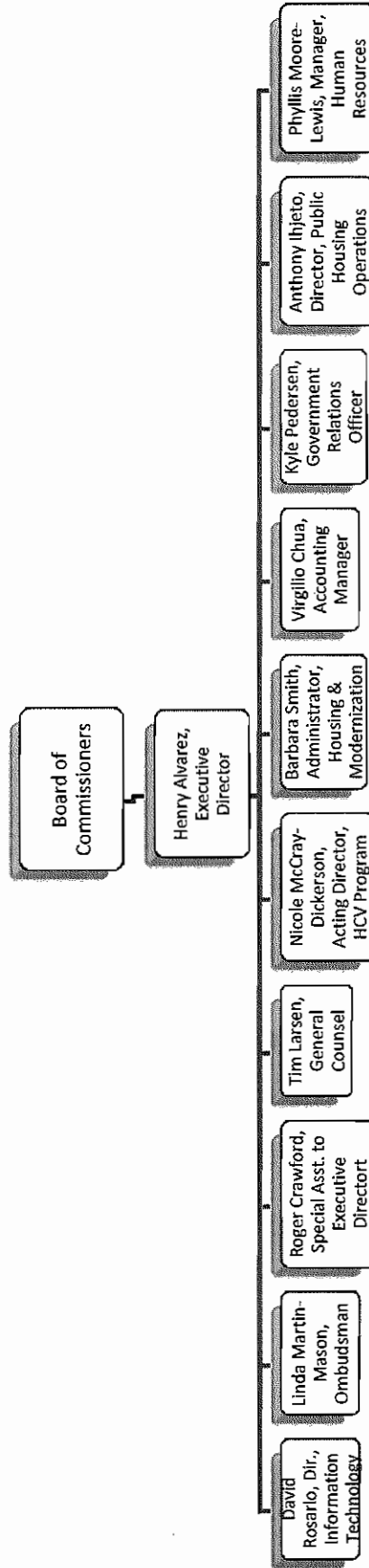
Section 11.0 Continued

- e. Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet* (PHAs receiving CFP grants only)
- f. Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations.
- g. Challenged Elements — **No Challenged Elements**
- h. Form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report*(PHAs receiving CFP grants only)
- i. Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan* (PHAs receiving CFP grants only)
- j. The SFHA has complied with all regulatory submission requirements prior to the submission deadline.

Attachment I

San Francisco Housing Authority Organizational Chart

SFHA ORGANIZATIONAL CHART



San Francisco Housing Authority

Admissions and Continued Occupancy Policy (ACOP)



Revised September 2012

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Chapter 1

OVERVIEW OF THE PROGRAM AND PLAN

INTRODUCTION

This chapter contains information about the PHA and its programs with emphasis on the public housing program. It also contains information about the purpose, intent and use of the Admission and Continued Occupancy Policy (ACOP) and guide.

Part I: The Public Housing Agency (PHA). This part includes a description of the PHA, its jurisdiction, its programs, and its mission and intent.

Part II: The Public Housing Program. This part contains information about the public housing program operation, roles and responsibilities, and partnerships.

Part III: The Admissions and Continued Occupancy Policy (ACOP). This part discusses the purpose and organization of the ACOP and its revision schedule. The instructions also contain guidance for each chapter and how to use the document within your agency.

PART I: THE PHA

1-I.A. OVERVIEW

This part describes the PHA's creation and authorization, the general structure of the organization, and the relationship between the PHA Board and staff.

1-I.B. ORGANIZATION AND STRUCTURE OF THE PHA

Public housing is funded by the federal government and administered by the San Francisco Housing Authority (SFHA) for the jurisdiction of the City and County of San Francisco, California.

The SFHA (or PHA) is governed by a board of officials who are called "commissioners." Although some PHAs may use a different title for their officials, this document will hitherto refer to the "board of commissioners" or the "board" when discussing the board of governing officials.

Commissioners are appointed in accordance with state housing law and generally serve in the same capacity as the directors of a corporation. The board of commissioners establishes policies under which the PHA conducts business, and ensures that those policies are followed by PHA staff. The board is responsible for preserving and expanding the agency's resources and assuring the agency's continued viability and success.

Formal actions of the PHA are taken through written resolutions, adopted by the board and entered into the official records of the PHA.

The principal staff member of the PHA is the Executive Director (ED), who is selected and hired by the board. The ED oversees the day to day operations of the PHA and is directly responsible for carrying out the policies established by the commissioners. The ED's duties include hiring, training, and supervising the PHA's staff, as well as budgeting and financial planning for the agency. Additionally, the ED is charged with ensuring compliance with federal and state laws, and program mandates.

1-I.C. PHA MISSION

The purpose of a mission statement is to communicate the purpose of the agency to people inside and outside of the agency. It provides the basis for strategy development, identification of critical success factors, resource allocation decisions, as well as ensuring client and stakeholder satisfaction.

SFHA Policy

The mission of the San Francisco Housing Authority is to deliver safe and decent housing for low income households and integrate economic opportunities for residents.

1-I.D. THE PHA'S COMMITMENT TO ETHICS AND SERVICE

As a public service agency, the PHA is committed to providing excellent service to all public housing applicants, residents, and the public. In order to provide superior service, the SFHA resolves to:

- Administer applicable federal and state laws and regulations to achieve high ratings in compliance measurement indicators while maintaining efficiency in program operation to ensure fair and consistent treatment of clients served.
- Provide decent, safe, and sanitary housing in good repair – in compliance with program uniform physical condition standards – for very low- and low-income families.
- Achieve a healthy mix of incomes in its public housing developments by attracting and retaining higher income families and by working toward deconcentration of poverty goals.
- Encourage self-sufficiency of participant families and assist in the expansion of family opportunities which address educational, socio-economic, recreational and other human service's needs.
- Promote fair housing and the opportunity for very low- and low-income families of all races, ethnicities, national origins, religions, ethnic backgrounds, and with all types of disabilities, to participate in the public housing program and its services.
- Create positive public awareness and expand the level of family and community support in accomplishing the PHA's mission.
- Attain and maintain a high level of standards and professionalism in day-to-day management of all program components.
- Administer an efficient, high-performing agency through continuous improvement of the SFHA's support systems and commitment to our employees and their development.

The SFHA will make every effort to keep residents informed of program rules and regulations, and to advise participants of how the program rules affect them.

PART II: THE PUBLIC HOUSING PROGRAM

1-II.A. OVERVIEW AND HISTORY OF THE PROGRAM

The intent of this section is to provide the public and staff an overview of the history and operation of public housing.

The United States Housing Act of 1937 (the “Act”) is responsible for the birth of federal housing program initiatives, known as public housing. The Act was intended to provide financial assistance to states and cities for public works projects, slum clearance and the development of affordable housing for low-income residents. There have been many changes to the program since its inception in 1937.

The Housing Act of 1965 established the availability of federal assistance, administered through local public agencies, to provide rehabilitation grants for home repairs and rehabilitation. This act also created the federal Department of Housing and Urban Development (HUD).

The Housing Act of 1969 created an operating subsidy for the public housing program for the first time. Until that time, public housing was a self-sustaining program.

In 1998, the Quality Housing and Work Responsibility Act (QHWRA) – also known as the Public Housing Reform Act or Housing Act of 1998 – was signed into law. Its purpose was to provide more private sector management guidelines to the public housing program and provide residents with greater choices. It also allowed PHAs more remedies to replace or revitalize severely distressed public housing developments. Highlights of the Reform Act include: the establishment of flat rents; the requirement for PHAs to develop five-year and annual plans; income targeting, a requirement that 40% of all new admissions in public housing during any given fiscal year be reserved for extremely low-income families; and resident self-sufficiency incentives.

1-II.B. PUBLIC HOUSING PROGRAM BASICS

HUD writes and publishes regulations in order to implement public housing laws enacted by Congress. HUD contracts with the PHA to administer programs in accordance with HUD regulations and provides an operating subsidy to the PHA. The PHA must create written policies that are consistent with HUD regulations. Among these policies is the PHA's Admissions and Continued Occupancy Policy (ACOP). The ACOP must be approved by the Board of Commissioners of the San Francisco Housing Authority.

The job of the PHA pursuant to HUD regulations is to provide decent, safe, and sanitary housing, in good repair, to low-income families at an affordable rent. The PHA screens applicants for public housing and, if they are found eligible and accepted, the PHA offers the applicant a unit. If the applicant accepts the offer, the PHA will enter into a contract with the applicant known as the lease. At this point, the applicant becomes a tenant of the public housing program.

In the context of the public housing program, a tenant is defined as the adult person(s) (other than a live-in aide who (1) executed the lease with the PHA as lessee of the dwelling unit, or, if no such person now resides in the unit, (2) who resides in the unit, and who is the remaining head of household of the tenant family residing in the dwelling unit. [24 CFR 966.53]. The Public Housing Occupancy Guidebook refers to tenants as "residents." The terms "tenant" and "resident" are used interchangeably in this policy. Additionally, this policy uses the term "family" or "families" for residents or applicants, depending on context.

Since the PHA owns the public housing development, the PHA is the landlord. The PHA must comply with all of the legal and management responsibilities of a landlord in addition to administering the program in accordance with HUD regulations and PHA policy.

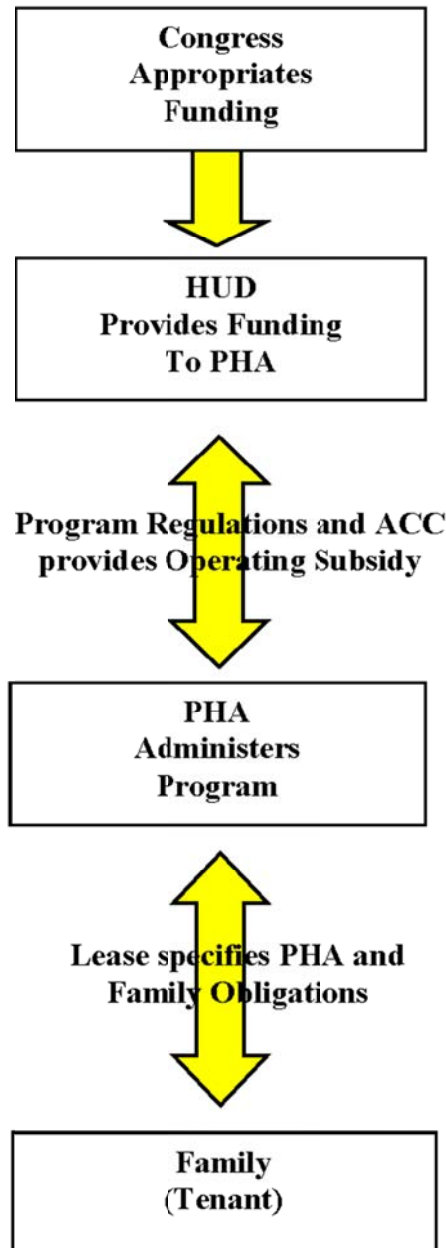
1-II.C. PUBLIC HOUSING PARTNERSHIPS

Relationships between the important parties are defined by federal regulations and by contract. To administer the public housing program, the PHA enters into a contractual relationship with HUD through the Annual Contribution Contract (ACC). The PHA also enters into a contractual relationship with the tenant through the public housing lease. These contracts outline the roles and responsibilities of each party.

Federal regulations further identify the important roles of the parties involved. For the program to work and be successful, all parties involved – HUD, the PHA, and the tenant – must play their important parts.

The chart on the following page illustrates key aspects of these relationships.

The Public Housing Relationships



What does HUD do?

Federal law is the source of HUD responsibilities. HUD has the following major responsibilities:

- Develop regulations, requirements, handbooks, notices and other guidance to implement housing legislation passed by Congress
- Allocate operating subsidies to PHAs
- Allocate capital funding to PHAs
- Provide technical assistance to PHAs on interpreting and applying program requirements
- Monitor PHA compliance with program requirements and PHA performance in program administration.

What does the PHA do?

The PHA's responsibilities originate in federal regulations and the ACC. The PHA owns and manages public housing developments, administers the program under contract with HUD and has the following major responsibilities:

- Establish local policies
- Review applications from interested applicant families to determine whether applicants are eligible for the program
- Maintain waiting list and select families for admission
- Maintain housing units by making any necessary repairs in a timely manner
- Screen families who apply for tenancy, to determine if they will be good renters
- Offer units to families (minimize vacancies without overcrowding)
- Maintain properties to the standard of decent, safe, sanitary, and in good repair (including assuring compliance with uniform physical conditions standards)
- Make sure the PHA has adequate financial resources to maintain its housing stock
- Ensure that families continue to qualify under the program
- Collect rent due from the assisted family and comply with and enforce provisions of the lease
- Ensure that families comply with program rules
- Provide families with prompt and professional service
- Comply with all fair housing and equal opportunity requirements, HUD regulations and requirements, the Annual Contributions Contract, HUD-approved applications for funding, the PHA's ACOP, and other applicable federal, state and local laws.

What does the Tenant do?

The tenant's responsibilities are articulated in the public housing lease. The tenant has the following broad responsibilities:

- Comply with the terms of the lease
- Provide the PHA with complete and accurate information, determined by the PHA to be necessary for administration of the program
- Cooperate in attending all appointments scheduled by the PHA
- Allow the PHA to inspect the unit at reasonable times and after reasonable notice
- Take responsibility for care of the housing unit, including any violations of uniform physical condition standards caused by the family
- Not engage in drug-related or violent criminal activity
- Notify the PHA before moving or termination of the lease
- Use the assisted unit only for residence and as the sole residence of the family. Not sublet the unit or assign the lease
- Promptly notify the PHA of any changes in family composition
- Not commit fraud, bribery, or any other corrupt or criminal act in connection with any housing programs.

If all parties fulfill their obligations in a professional and timely manner, the program responsibilities will be fulfilled in an effective manner.

1-II.D. APPLICABLE REGULATIONS

Applicable regulations include:

- 24 CFR Part 5: General Program Requirements
- 24 CFR Part 8: Nondiscrimination
- 24 CFR Part 35: Lead-Based Paint
- 24 CFR Part 902: Public Housing Assessment System
- 24 CFR Part 903: Public Housing Agency Plans
- 24 CFR Part 945: Designated Housing
- 24 CFR Part 960: Admission and Occupancy Policies
- 24 CFR Part 965: PHA-Owned or Leased Projects – General Provisions
- 24 CFR Part 966: Lease and Grievance Procedures

PART III: THE ADMISSIONS AND CONTINUED OCCUPANCY POLICIES

1-III.A. OVERVIEW AND PURPOSE OF THE POLICY

The ACOP is the PHA's written statement of policies used to carry out the housing program in accordance with federal law and regulations, and HUD requirements. The ACOP is required by HUD and it must be available for public review [CFR 24 Part 903]. The ACOP also contains policies that support the objectives contained in the PHA's Agency Plan.

All issues related to public housing not addressed in this ACOP are governed by federal regulations, HUD handbooks and guidebooks, notices and applicable state and local laws. The policies in this ACOP have been designed to ensure compliance with the consolidated ACC and all HUD-approved applications for program funding. The PHA is responsible for complying with all changes in HUD regulations pertaining to public housing. If such changes conflict with this plan, HUD regulations will have precedence.

1-III.B. CONTENTS OF THE POLICY

Unlike the housing choice voucher program, HUD regulations for public housing do not contain a list of what must be included in the ACOP. However, individual regulations contain requirements of inclusion in the PHA's written policy. At a minimum, the ACOP plan should cover PHA policies on these subjects:

- The organization of the waiting list and how families are selected and offered available units, including any PHA admission preferences, procedures for removing applicant names from the waiting list, and procedures for closing and reopening the PHA waiting list (Chapters 4 and 5)
- Transfer policies and the circumstances under which a transfer would take precedence over an admission (Chapter 12)
- Standards for determining eligibility, suitability for tenancy, and the size and type of the unit needed (Chapters 3 and 5)
- Procedures for verifying the information the family has provided (Chapter 7)
- The method for achieving deconcentration of poverty and income-mixing of public housing developments (Chapter 4)
- Grievance procedures (Chapter 14)
- Policies concerning payment by a family to the PHA of amounts the family owes the PHA (Chapter 15 and 16)
- Interim redeterminations of family income and composition (Chapter 9)
- Policies regarding community service requirements; (Chapter 11)
- Policies and rules about safety and ownership of pets in public housing (Chapter 10).

New Approach to Policy Development

HUD has developed an approach to monitoring policy that emphasizes the importance of consistency. The ACOP supports that goal by clearly defining PHA policy for PHA management and staff.

A primary focus of programs like HUD's Rental Integrity Monitoring (RIM) program has been consistency in how PHAs conduct their business and in how HUD monitors PHA activities. HUD has made it clear that consistency in PHA conduct is important. Referring to and following the ACOP is essential to maintaining consistency in applying PHA policy.

HUD makes a distinction between:

- Mandatory policies: those driven by legislation, regulations, current handbooks, notices, and legal opinions, and
- Optional, non-binding guidance, including guidebooks, notices that have expired and recommendations from individual HUD staff.

HUD expects PHAs to develop policies and procedures that are consistent with mandatory policies and to make clear the optional policies the PHA has adopted. The PHA's Admissions and Continued Occupancy Policy is the document that contains and clarifies PHA policy. HUD's new direction adds additional emphasis to the need for a clearly written and comprehensive ACOP to guide staff in the clear and consistent application of policy.

HUD has already determined that the recommendations and suggestions it makes are consistent with mandatory policies. Therefore, following HUD guidance in the preparation of PHA policy, even though it is not mandatory, provides a PHA with a "safe harbor." If a PHA adopts its own optional policy, it must make its own determination that such policy is consistent with legislation, regulations, and other mandatory requirements. There may be very good reasons for adopting a policy or procedure that is different than that suggested by HUD, but PHAs should carefully think through those decisions and be able to articulate how their policy is consistent with federal laws, regulations and mandatory policy.

When HUD permits or requires the PHA to establish policies not clearly defined by legislation, regulations, handbooks, notices and/or legal opinions these policies are identified in this ACOP by the heading "SFHA Policy".

1-III.C. UPDATING AND REVISING THE POLICY

The PHA will revise this ACOP as needed to comply with changes in HUD regulations. The original policy and any changes must be approved by the board of commissioners of the PHA, the pertinent sections included in the Agency Plan, and a copy provided to HUD.

SFHA Policy

The PHA will review and update the ACOP at least once a year, and more often if needed, to reflect changes in regulations, PHA operations, or when needed to ensure staff consistency in operation.

Chapter 2

FAIR HOUSING AND EQUAL OPPORTUNITY

INTRODUCTION

This chapter explains the laws and HUD regulations requiring PHAs to affirmatively further civil rights and fair housing in all federally-assisted housing programs. The letter and spirit of these laws are implemented through consistent policy and processes. The responsibility to further nondiscrimination pertains to all areas of the PHA's public housing operations.

This chapter describes HUD regulations and PHA policies related to these topics in three parts:

Part I: Nondiscrimination. This part presents the body of laws and regulations governing the responsibilities of the SFHA regarding nondiscrimination.

Part II: Policies Related to Persons with Disabilities. This part discusses the rules and policies of the public housing program related to reasonable accommodation for persons with disabilities. These rules and policies are based on the Fair Housing Act (42.U.S.C.) and Section 504 of the Rehabilitation Act of 1973, and incorporate guidance from the Joint Statement of The Department of Housing and Urban Development and the Department of Justice (DOJ), issued May 17, 2004.

Part III: Prohibition of Discrimination Against Limited English Proficiency Persons. This part details the obligations of the PHA to ensure meaningful access to the public housing program and its activities by persons with limited English proficiency (LEP). This part incorporates the Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons published January 22, 2007, in the *Federal Register*.

PART I: NONDISCRIMINATION

2-I.A. OVERVIEW

Federal laws require PHAs to treat all applicants and tenant families equally, providing the same quality of service, regardless of family characteristics and background. Federal law prohibits discrimination in housing on the basis of race, color, religion, sex, national origin, age, familial status, and disability. In addition, HUD regulations provide for additional protections regarding sexual orientation, gender identity, and marital status. The PHA will comply fully with all federal, state, and local nondiscrimination laws, and with rules and regulations governing fair housing and equal opportunity in housing and employment, including:

- Title VI of the Civil Rights Act of 1964
- Title VIII of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988)
- Executive Order 11063
- Section 504 of the Rehabilitation Act of 1973
- The Age Discrimination Act of 1975
- Title II of the Americans with Disabilities Act (to the extent that it applies, otherwise Section 504 and the Fair Housing Amendments govern)
- Violence Against Women Reauthorization Act of 2005 (VAWA)
- The Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule, published in the *Federal Register* February 3, 2012
- When more than one civil rights law applies to a situation, the laws will be read and applied together.
- Any applicable state laws or local ordinances and any legislation protecting individual rights of tenants, applicants, or staff that may subsequently be enacted

2-I.B. NONDISCRIMINATION

Federal regulations prohibit discrimination against certain protected classes and other groups of people. State and local requirements, as well as PHA policies, can prohibit discrimination against additional classes of people.

The PHA shall not discriminate because of race, color, sex, religion, national or ethnic origin, familial status or disability to be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under the SFHA housing programs (called “protected classes”). Familial status includes children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18.

The PHA will not discriminate on the basis of marital status, gender identity, or sexual orientation. [FR Notice 02/03/12].

SFHA Policy

The PHA will not use any of these factors to:

- Deny to any family the opportunity to apply for housing, nor deny to any qualified applicant the opportunity to participate in the public housing program
- Provide housing that is different from that provided to others
- Subject anyone to segregation or disparate treatment
- Restrict anyone's access to any benefit enjoyed by others in connection with the housing program
- Treat a person differently in determining eligibility or other requirements for admission
- Steer an applicant or tenant toward or away from a particular area based on any of these factors
- Deny anyone access to the same level of services
- Deny anyone the opportunity to participate in a planning or advisory group that is an integral part of the housing program
- Discriminate in the provision of residential real estate transactions
- Discriminate against someone because they are related to or associated with a member of a protected class
- Publish or cause to be published an advertisement or notice indicating the availability of housing that prefers or excludes persons who are members of a protected class

Providing Information to Families

The PHA must take steps to ensure that families are fully aware of all applicable civil rights laws. As part of the public housing orientation process, the PHA will provide information to public housing applicant families about civil rights requirements.

Discrimination Complaints

If an applicant or tenant family believes that any family member has been discriminated against by the PHA, the family should advise the PHA. HUD requires the PHA to make every reasonable attempt to determine whether the applicant's or tenant family's assertions have merit and take any warranted corrective action.

SFHA Policy

Applicants or tenant families who believe that they have been subject to unlawful discrimination must notify the PHA either orally or in writing.

The PHA will attempt to remedy discrimination complaints made against the PHA.

PART II: POLICIES RELATED TO PERSONS WITH DISABILITIES

2-II.A. OVERVIEW

One type of disability discrimination prohibited by the Fair Housing Act is the refusal to make reasonable accommodation in rules, policies, practices, or services when such accommodation may be necessary to afford a person with a disability the equal opportunity to use and enjoy a program or dwelling under the program.

The PHA must ensure that persons with disabilities have full access to the PHA's programs and services. This responsibility begins with the first inquiry of an interested family and continues through every programmatic area of the public housing program [24 CFR 8].

The PHA must provide a notice to each tenant that the tenant may, at any time during the tenancy, request reasonable accommodation of a handicap of a household member, including reasonable accommodation so that the tenant can meet lease requirements or other requirements of tenancy [24 CFR 966.7(b)].

SFHA Policy

The PHA will ask all applicants and resident families if they require any type of accommodations, in writing, on the intake application, reexamination documents, and notices of adverse action by the PHA, by including the following language:

“If you or anyone in your family is a person with disabilities, and you require a specific accommodation in order to fully utilize our programs and services, please contact the housing authority.”

A specific name and phone number will be indicated as the contact for requests for accommodation for persons with disabilities.

2-II.B. DEFINITION OF REASONABLE ACCOMMODATION

A “reasonable accommodation” is a change, exception, or adjustment to a policy, practice or service that may be necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces. Since policies and services may have a different effect on persons with disabilities than on other persons, treating persons with disabilities exactly the same as others will sometimes deny them an equal opportunity to use and enjoy a dwelling. [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act]

Federal regulations stipulate that requests for accommodations will be considered reasonable if they do not create an "undue financial and administrative burden" for the PHA, or result in a “fundamental alteration” in the nature of the program or service offered. A fundamental alteration is a modification that alters the essential nature of a provider’s operations.

Types of Reasonable Accommodations

When it is reasonable (see definition above and Section 2-II.E), the PHA shall accommodate the needs of a person with disabilities. Examples include but are not limited to:

- Permitting applications and reexaminations to be completed by mail
- Conducting home visits
- Permitting a higher utility allowance for the unit if a person with disabilities requires the use of specialized equipment related to the disability
- Modifying or altering a unit or physical system if such a modification or alteration is necessary to provide equal access to a person with a disability
- Installing a ramp into a dwelling or building
- Installing grab bars in a bathroom
- Installing visual fire alarms for hearing impaired persons
- Allowing a PHA-approved live-in aide to reside in the unit if that person is determined to be essential to the care of a person with disabilities, is not obligated for the support of the person with disabilities, and would not be otherwise living in the unit.
- Providing a designated handicapped-accessible parking space
- Allowing an assistance animal
- Permitting an authorized designee or advocate to participate in the application or certification process and any other meetings with PHA staff
- Displaying posters and other housing information in locations throughout the PHA's office in such a manner as to be easily readable from a wheelchair

2-II.C. REQUEST FOR AN ACCOMMODATION

If an applicant or participant indicates that an exception, change, or adjustment to a rule, policy, practice, or service is needed because of a disability, HUD requires that the PHA treat the information as a request for a reasonable accommodation, even if no formal request is made [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].

The family must explain what type of accommodation is needed to provide the person with the disability full access to the PHA's programs and services.

If the need for the accommodation is not readily apparent or known to the PHA, the family must explain the relationship between the requested accommodation and the disability.

SFHA Policy

The PHA will encourage the family to make its request in writing using the designated reasonable accommodation request form. However, the PHA will consider the accommodation any time the family indicates that an accommodation is needed whether or not a formal written request is submitted.

2-II.D. VERIFICATION OF DISABILITY

The regulatory civil rights definition for persons with disabilities is provided in Exhibit 2-1 at the end of this chapter. The definition of a person with a disability for the purpose of obtaining a reasonable accommodation is much broader than the HUD definition of disability which is used for waiting list preferences and income allowances.

Before providing an accommodation, the PHA must determine that the person meets the definition of a person with a disability, and that the accommodation will enhance the family's access to the PHA's programs and services.

If a person's disability is obvious or otherwise known to the PHA, and if the need for the requested accommodation is also readily apparent or known, no further verification will be required [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].

If a family indicates that an accommodation is required for a disability that is not obvious or otherwise known to the PHA, the PHA must verify that the person meets the definition of a person with a disability, and that the limitations imposed by the disability require the requested accommodation.

When verifying a disability, the PHA will follow the verification policies provided in Chapter 7. All information related to a person's disability will be treated in accordance with the confidentiality policies provided in Chapter 16 (Program Administration). In addition to the general requirements that govern all verification efforts, the following requirements apply when verifying a disability:

- Third-party verification must be obtained from an individual identified by the family who is competent to make the determination. A doctor or other medical professional, a peer support group, a non-medical service agency, or a reliable third party who is in a position to know about the individual's disability may provide verification of a disability [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act]
- The PHA must request only information that is necessary to evaluate the disability-related need for the accommodation. The PHA may not inquire about the nature or extent of any disability
- Medical records will not be accepted or retained in the participant file

SFHA Policy

Disability is defined as any physical or mental impairment that limits one or more of their major life activities.

2-II.E. APPROVAL/DENIAL OF A REQUESTED ACCOMMODATION

[Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act]

The PHA must approve a request for an accommodation if the following three conditions are met.

- The request was made by or on behalf of a person with a disability.
- There is a disability-related need for the accommodation.
- The requested accommodation is reasonable, meaning it would not impose an undue financial and administrative burden on the PHA, or fundamentally alter the nature of the PHA's operations.

Requests for accommodations must be assessed on a case-by-case basis. The determination of undue financial and administrative burden must be made on a case-by-case basis involving various factors, such as the cost of the requested accommodation, the financial resources of the PHA at the time of the request, the benefits that the accommodation would provide to the family, and the availability of alternative accommodations that would effectively meet the family's disability-related needs.

Before making a determination whether to approve the request, the PHA may enter into discussion and negotiation with the family, request more information from the family, or may require the family to sign a consent form so that the PHA may verify the need for the requested accommodation.

SFHA Policy

After a request for an accommodation is presented, the PHA will respond, in writing, within 30 calendar days.

If the PHA denies a request for an accommodation because there is no relationship, or nexus, found between the disability and the requested accommodation, the notice will inform the family of the right to appeal the PHA's decision through the grievance process (see Chapter 14).

If the PHA denies a request for an accommodation because it is not reasonable (it would impose an undue financial and administrative burden or fundamentally alter the nature of the PHA's operations), the PHA will discuss with the family whether an alternative accommodation could effectively address the family's disability-related needs without a fundamental alteration to the public housing program and without imposing an undue financial and administrative burden.

If the PHA believes that there is no reasonable alternative to the reasonable accommodation request, the PHA will notify the family, in writing, of its determination within 30 calendar days from the date of the most recent discussion or communication with the family. The notice will inform the family of the right to appeal the PHA's decision through the grievance process (see Chapter 14).

2-II.F. PROGRAM ACCESSIBILITY FOR PERSONS WITH HEARING OR VISION IMPAIRMENTS

HUD regulations require the PHA to take reasonable steps to ensure that persons with disabilities related to hearing and vision have reasonable access to the PHA's programs and services [24 CFR 8.6].

At the initial point of contact with each applicant, the PHA shall inform all applicants of alternative forms of communication that can be used other than plain language paperwork.

SFHA Policy

To meet the needs of persons with hearing impairments, TTD/TTY (text telephone display / teletype) communication will be available.

To meet the needs of persons with vision impairments, large-print versions of key program documents will be made available upon request. When visual aids are used in public meetings or presentations, or in meetings with PHA staff, one-on-one assistance will be provided upon request.

Additional examples of alternative forms of communication are sign language interpretation; having material explained orally by staff; or having a third party adult representative (a friend, relative or advocate, named by the applicant) to receive, interpret and explain housing materials and be present at all meetings.

2-II.G. PHYSICAL ACCESSIBILITY

The PHA must comply with a variety of regulations pertaining to physical accessibility, including the following.

- Notice PIH 2006-13
- Section 504 of the Rehabilitation Act of 1973
- The Americans with Disabilities Act of 1990
- The Architectural Barriers Act of 1968
- The Fair Housing Act of 1988

The PHA's policies concerning physical accessibility must be readily available to applicants and resident families. They can be found in three key documents.

- This policy, the Admissions and Continued Occupancy Policy, describes the key policies that govern the PHA's responsibilities with regard to physical accessibility
- Notice PIH 2006-13 summarizes information about pertinent laws and implementing regulations related to non-discrimination and accessibility in federally-funded housing programs
- The PHA Plan provides information about self-evaluation, needs assessment, and transition plans

The design, construction, or alteration of PHA facilities must conform to the Uniform Federal Accessibility Standards (UFAS). Newly-constructed facilities must be designed to be readily accessible to and usable by persons with disabilities. Alterations to existing facilities must be accessible to the maximum extent feasible, defined as not imposing an undue financial and administrative burden on the operations of the public housing program.

2-II.H. DENIAL OR TERMINATION OF ASSISTANCE

A PHA's decision to deny or terminate the assistance of a family that includes a person with disabilities is subject to consideration of reasonable accommodation [24 CFR 966.7].

When applicants with disabilities are denied assistance, the notice of denial must inform them of their right to request an informal hearing [24 CFR 960.208(a)].

When a family's lease is terminated, the notice of termination must inform the family of their right to request a hearing in accordance with the PHA's grievance process [24 CFR 966.4(1)(3)(ii)].

When reviewing reasonable accommodation requests, the PHA must consider whether reasonable accommodation will allow the family to overcome the problem that led to the PHA's decision to deny or terminate assistance. If a reasonable accommodation will allow the family to meet the requirements, the PHA must make the accommodation [24 CFR 966.7].

In addition, the PHA must provide reasonable accommodation for persons with disabilities to participate in the hearing process [24 CFR 966.56(h)].

PART III: IMPROVING ACCESS TO SERVICES FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)

2-III.A. OVERVIEW

Language for Limited English Proficiency Persons (LEP) can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by the public housing program. In certain circumstances, failure to ensure that LEP persons can effectively participate in or benefit from federally-assisted programs and activities may violate the prohibition under Title VI against discrimination on the basis of national origin. This part incorporates the Final Guidance to Federal Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons, published January 22, 2007, in the *Federal Register*.

The PHA will take affirmative steps to communicate with people who need services or information in a language other than English. These persons will be referred to as Persons with Limited English Proficiency (LEP).

LEP persons are defined as persons who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English. For the purposes of this Admissions and Continued Occupancy Policy, LEP persons are public housing applicants and resident families, and parents and family members of applicants and resident families.

In order to determine the level of access needed by LEP persons, the PHA will balance the following four factors: (1) the number or proportion of LEP persons eligible to be served or likely to be encountered by the public housing program; (2) the frequency with which LEP persons come into contact with the program; (3) the nature and importance of the program, activity, or service provided by the program to people's lives; and (4) the resources available to the PHA and costs. Balancing these four factors will ensure meaningful access by LEP persons to critical services while not imposing undue burdens on the PHA.

The SFHA's LEP Plan is included as Appendix A of this ACOP.

EXHIBIT 2-1: DEFINITION OF A PERSON WITH A DISABILITY UNDER FEDERAL CIVIL RIGHTS LAWS [24 CFR Parts 8.3 and 100.201]

A person with a disability, as defined under federal civil rights laws, is any person who:

- Has a physical or mental impairment that substantially limits one or more of the major life activities of an individual, or
- Has a record of such impairment, or
- Is regarded as having such impairment

The phrase “physical or mental impairment” includes:

- Any physiological disorder or condition, cosmetic or disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine; or
- Any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term “physical or mental impairment” includes, but is not limited to: such diseases and conditions as orthopedic, visual, speech and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, drug addiction and alcoholism.

“Major life activities” includes, but is not limited to, caring for oneself, performing manual tasks, walking, seeing, hearing, breathing, learning, and/or working.

“Has a record of such impairment” means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major live activities.

“Is regarded as having an impairment” is defined as having a physical or mental impairment that does not substantially limit one or more major life activities but is treated by a public entity (such as the PHA) as constituting such a limitation; has none of the impairments defined in this section but is treated by a public entity as having such an impairment; or has a physical or mental impairment that substantially limits one or more major life activities, only as a result of the attitudes of others toward that impairment.

The definition of a person with disabilities does not include:

- Current illegal drug users
- People whose alcohol use interferes with the rights of others
- Persons who objectively pose a direct threat or substantial risk of harm to others that cannot be controlled with a reasonable accommodation under the public housing program

The above definition of disability determines whether an applicant or participant is entitled to any of the protections of federal disability civil rights laws. Thus, a person who does not meet this definition of disability is not entitled to a reasonable accommodation under federal civil rights and fair housing laws and regulations.

The HUD definition of a person with a disability is much narrower than the civil rights definition of disability. The HUD definition of a person with a disability is used for purposes of receiving the disabled family preference, the \$400 elderly/disabled household deduction, the allowance for medical expenses, or the allowance for disability assistance expenses.

The definition of a person with a disability for purposes of granting a reasonable accommodation request is much broader than the HUD definition of disability. Many people will not qualify as a disabled person under the public housing program, yet an accommodation is needed to provide equal opportunity.

7Chapter 3

ELIGIBILITY

INTRODUCTION

The PHA is responsible for ensuring that every individual and family admitted to the public housing program meets all program eligibility requirements. This includes any individual approved to join the family after the family has been admitted to the program. The family must provide any information needed by the PHA to confirm eligibility and determine the level of the family's assistance.

To be eligible for the public housing program:

- The applicant family must:
 - Qualify as a family as defined by HUD and the PHA.
 - Have income at or below HUD-specified income limits.
 - Qualify on the basis of citizenship or the eligible immigrant status of family members.
 - Provide social security number information for family members as required.
 - Consent to the PHA's collection and use of family information as provided for in PHA-provided consent forms.
- The PHA must determine that the current or past behavior of household members does not include activities that are prohibited by HUD or the PHA.

This chapter contains three parts:

Part I: Definitions of Family and Household Members. This part contains HUD and PHA definitions of family and household members and explains initial and ongoing eligibility issues related to these members.

Part II: Basic Eligibility Criteria. This part discusses income eligibility, and rules regarding citizenship, social security numbers, and family consent.

Part III: Denial of Admission. This part covers factors related to an applicant's past or current conduct (e.g. criminal activity) that can cause the PHA to deny admission.

PART I: DEFINITIONS OF FAMILY AND HOUSEHOLD MEMBERS

3-I.A. OVERVIEW

Some eligibility criteria and program rules vary depending upon the composition of the family requesting assistance. In addition, some requirements apply to the family as a whole and others apply to individual persons who will live in the public housing unit. This part provides information that is needed to correctly identify family and household members, and to apply HUD's eligibility rules.

3-I.B. FAMILY AND HOUSEHOLD [24 CFR 5.403 and HUD-50058 IB, p. 13, FRR Notice 02/03/12]

The terms *family* and *household* have different meanings in the public housing program.

Family

To be eligible for admission, an applicant must qualify as a family. *Family* as defined by HUD, includes but is not limited to the following, regardless actual or perceived sexual orientation, gender identity, or marital status, a single person, who may be an elderly person, disabled person, near-elderly person, or any other single person; or a group of persons residing together. Such group includes, but is not limited to a family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family), an elderly family, a near-elderly family, a disabled family, a displaced family, or the remaining member of a tenant family. The PHA has the discretion to determine if any other group of persons qualifies as a family.

Gender Identity means actual or perceived gender characteristics.

Sexual orientation means homosexuality, heterosexuality, or bisexuality

SFHA Policy

A family also includes two or more individuals who are not related by blood, marriage, adoption, or other operation of law, but who either can demonstrate that they have lived together previously or certify that each individual's income and other resources will be available to meet the needs of the family. This definition includes but is not limited to:

- a) A family with or without children (the temporary absence of a child from the home due to placement in foster care shall not be considered in determining family composition and family size);
- b) An elderly family;
- c) A near-elderly family;
- d) A disabled family;
- e) A displaced family;
- f) The remaining member of a tenant family; and

- g) A single person who is not elderly or displaced person with disabilities, or the remaining member of a tenant family.

Each family must identify the individuals to be included in the family at the time of application, and must update this information if the family's composition changes.

Verification shall be established by utility bills that include the family name and address; bank statements that include the family name and address; and/or third party correspondence to family address.

Household

Household is a broader term that includes additional people who, with the PHA's permission, live in a public housing unit, such as live-in aides, foster children, and foster adults.

3-I.C. FAMILY BREAK-UP AND REMAINING MEMBER OF TENANT FAMILY

Family Break-up

SFHA Policy

When a family on the waiting list breaks up into two otherwise eligible families, only one of the new families may retain the original application date. Other former family members may make a new application with a new application date if the waiting list is open.

If a family breaks up into two otherwise eligible families while receiving assistance, only one of the new families will continue to be assisted.

If a court determines the disposition of property between members of the applicant or resident family in a divorce or separation decree, the PHA will abide by the court's determination. This includes cooperating with law enforcement authorities to enforce civil protection orders issued for the protection of victims and addressing the distribution of personal property among household members in cases where a family breaks up.

In the absence of a judicial decision, or an agreement among the original family members, the PHA will determine which family retains their placement on the waiting list, or will continue to receive assistance taking into consideration the following factors: (1) the interest of any minor children, including custody arrangements, (2) the interest of any ill, elderly, or disabled family members, (3) any possible risks to family members as a result of domestic violence or criminal activity, and (4) the recommendations of social service professionals. If the family break –up results from an occurrence of domestic violence, dating violence, or stalking as provided in 24 CFR part 5, subpart L, the SFHA must ensure that the victim retain assistance.

Remaining Member of a Tenant Family [24 CFR 5.403]

The HUD definition of family includes the *remaining member of a tenant family*, which is a member of a resident family who remains in the unit when other members of the family have left the unit [PH Occ GB, p. 26]. Household members such as live-in aides, foster children, and foster adults do not qualify as remaining members of a family.

If dependents are the only “remaining members of a tenant family” and there is no family member able to assume the responsibilities of the head of household, refer to Chapter 6, Section 6-I.B, for the policy on “Caretakers for a Child.”

3-I.D. HEAD OF HOUSEHOLD [24 CFR 5.504(b)]

Head of household means the adult member of the family who is considered the head for purposes of determining income eligibility and rent. The head of household is responsible for ensuring that the family fulfills all of its responsibilities under the program, alone or in conjunction with a co-head or spouse.

SFHA Policy

The family may designate any qualified family member as the head of household.

The head of household must have the legal capacity to enter into a lease under state and local law. A minor who is emancipated under state law may be designated as head of household.

3-I.E. SPOUSE, COHEAD, AND OTHER ADULT

A family may have a spouse or co-head, but not both [HUD-50058 IB, p. 13].

Spouse means the marriage partner of the head of household. The term “spouse” does not apply to friends, roommates, or significant others who are not marriage partners. A minor who is emancipated under state law may be designated as a spouse.

A *co-head* is an individual in the household who is equally responsible with the head of household for ensuring that the family fulfills all of its responsibilities under the program, but who is not a spouse. A family can have only one co-head. Minors who are emancipated under state law may be designated as a co-head.

Other adult means a family member, other than the head, spouse, or co-head, who is 18 years of age or older. Foster adults and live-in aides are not considered other adults. [HUD-50058 IB. p. 14].

3-I.F. DEPENDENT [24 CFR 5.603]

A *dependent* is a family member who is under 18 years of age or a person of any age who is a person with a disability or a full-time student, except that the following persons can never be dependents: the head of household, spouse, co-head, foster children/adults and live-in aides. Identifying each dependent in the family is important because each dependent qualifies the family for a deduction from annual income as described in Chapter 6.

Joint Custody of Dependents

SFHA Policy

Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or resident family 51 percent or more of the time.

When more than one applicant or assisted family (regardless of program) are claiming the same dependents as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim the dependents. If there is a dispute about which family should claim them, the PHA will make the determination based on available documents such as court orders, or an IRS return showing which family has claimed the child for income tax purposes.

3-I.G. FULL-TIME STUDENT [24 CFR 5.603; HCV GB, p. 5-29]

A *full-time student* (FTS) is a person who is attending school or vocational training on a full-time basis. The time commitment or subject load that is needed to be full-time is defined by the educational institution.

Identifying each FTS is important because: (1) each family member that is an FTS, other than the head, spouse, or co-head, qualifies the family for a dependent deduction, and (2) the income of such an FTS is treated differently from the income of other family members.

3-II.G. FULL-TIME COLLEGE STUDENTS OF NON-PARENTAL/GUARDIAN HOUSEHOLDS

Full-time college students of non-parental/guardian households are not eligible for admission to the Housing Choice Voucher, Project-based Voucher, Public Housing and Housing Choice Voucher Rehabilitation Programs unless students meet the following eligibility standards:

1. The student must be 18 and/or be an emancipated minor under state law.
2. The student must be income-eligible for admission.

The Housing Authority is required to verify and include the following source of income for full-time college students of non-parental/guardian household:

1. Financial support such as money, food, clothing, personal items and entertainment. The financial support must come from an outside source such as parents or guardians in the form of “periodic and determinable allowance” or “regular contributions or gifts.”
2. Athletic scholarship that is available for housing cost.

3-I.H. ELDERLY AND NEAR-ELDERLY PERSONS, AND ELDERLY FAMILY [24 CFR 5.100, 5.403, 945.105, and FR Notice 02/03/12]

Elderly Persons

An *elderly person* is a person who is at least 62 years of age.

Near-Elderly Persons

A *near-elderly person* is a person who is 50-61 years of age.

Elderly Family

An *elderly family* is one in which the head, spouse, co-head, or sole member is an elderly person. Identifying elderly families is important because these families qualify for special deductions from income as described in Chapter 6 and may qualify for a particular type of development as noted in Chapter 4.

3-I.I. PERSONS WITH DISABILITIES AND DISABLED FAMILY [24 CFR 5.403, FR Notice 02/03/12]

Persons with Disabilities

Under the public housing program, special rules apply to persons with disabilities and to any family whose head, spouse, or co-head is a person with disabilities. The technical definitions of individual(s) with handicaps and persons with disabilities are provided in Exhibit 3-1 at the end of this chapter. These definitions are used for a number of purposes including ensuring that persons with disabilities are not discriminated against based upon disability.

As discussed in Chapter 2, the PHA must make all aspects of the public housing program accessible to persons with disabilities and consider reasonable accommodations requested based upon a person's disability.

Disabled Family

A *disabled family* is one in which the head, spouse, or co-head is a person with disabilities. Identifying disabled families is important because these families qualify for special deductions from income as described in Chapter 6 and may qualify for a particular type of development as noted in Chapter 4.

Even though persons with drug or alcohol dependencies are considered persons with disabilities for the purpose of non-discrimination, this does not prevent the PHA from denying admission for reasons related to alcohol and drug abuse following policies found in Part III of this chapter, or from enforcing the lease following the policies in Chapter 13.

3-I.J. GUESTS [24 CFR 5.100]

A *guest* is defined as a person temporarily staying in the unit with the consent of a tenant or other member of the household who has express or implied authority to so consent on behalf of the tenant.

The lease must provide that the tenant has the right to exclusive use and occupancy of the leased unit by the members of the household authorized to reside in the unit in accordance with the lease, including reasonable accommodation of their guests [24 CFR 966.4(d)]. The head of household is responsible for the conduct of visitors and guests, inside the unit as well as anywhere on or near PHA premises [24 CFR 966.4(f)].

SFHA Policy

A guest can remain in the unit no longer than 14 consecutive days or a total of 30 cumulative calendar days during any 12 month period.

A family may request an exception to this policy for valid reasons (e.g., care of a relative recovering from a medical procedure expected to last 20 consecutive days). An exception will not be made unless the family can identify and provide documentation of the residence to which the guest will return and the period of time the guest will return.

Children who are subject to a joint custody arrangement or for whom a family has visitation privileges, that are not included as a family member because they live outside of the public housing unit more than 50 percent of the time, are not subject to the time limitations of guests as described above.

Former public housing residents who have been evicted by the SFHA are not permitted as overnight guests.

Guests who represent the unit address as their residence address for receipt of benefits or other purposes will be considered unauthorized occupants. In addition, guests who remain in the unit beyond the allowable time limit will be considered unauthorized occupants, and their presence will constitute a violation of the lease.

3-I.K. FOSTER CHILDREN AND FOSTER ADULTS

Foster adults are usually persons with disabilities, unrelated to the tenant family, who are unable to live alone [24 CFR 5.609(c)(2)].

The term *foster child* is not specifically defined by the regulations.

Foster children and foster adults that are living with an applicant or resident family are considered household members but not family members. The income of foster children/adults is not counted in family annual income and foster children/adults do not qualify for a dependent deduction [24 CFR 5.603 and HUD-50058 IB, pp. 13-14].

SFHA Policy

A foster child is a child, or a nonminor dependent as defined in California Welfare and Institution Code section 1400(v) that is in the legal guardianship or custody of a state, county, or private adoption or foster care agency, yet is cared for by foster parents in their own homes, under some kind of short-term or long-term foster care arrangement with the custodial agency.

Children that are temporarily absent from the home as a result of placement in foster care are discussed in Section 3-I.L.

3-I.L. ABSENT FAMILY MEMBERS

Individuals may be absent from the family, either temporarily or permanently, for a variety of reasons including educational activities, placement in foster care, employment, and illness.

Definitions of Temporarily and Permanently Absent

SFHA Policy

Generally an individual who is or is expected to be absent from the public housing unit for 180 consecutive days or less is considered temporarily absent and continues to be considered a family member. Generally an individual who is or is expected to be absent from the public housing unit for more than 180 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.

Absent Students

SFHA Policy

When someone who has been considered a family member attends school away from home, the person will continue to be considered a family member unless information becomes available to the PHA indicating that the student has established a separate household or the family declares that the student has established a separate household.

Absences Due to Placement in Foster Care [24 CFR 5.403]

Children temporarily absent from the home as a result of placement in foster care are considered members of the family.

SFHA Policy

If a child has been placed in foster care, the PHA will verify with the appropriate agency whether and when the child is expected to be returned to the home. Unless the agency confirms that the child has been permanently removed from the home, the child will be counted as a family member.

Absent Head, Spouse, or Co-head

SFHA Policy

An employed head, spouse, or co-head absent from the unit more than 180 consecutive days due to employment will continue to be considered a family member.

Individuals Confined for Medical Reasons

SFHA Policy

An individual confined to a nursing home or hospital on a permanent basis is not considered a family member.

If there is a question about the status of a family member, the PHA will request verification from a responsible medical professional and will use this determination. If the responsible medical professional cannot provide a determination, the person generally will be considered temporarily absent. The family may present evidence that the family member is confined on a permanent basis and request that the person not be considered a family member.

Return of Permanently Absent Family Members

SFHA Policy

The family must request PHA approval for the return of any adult family members that the PHA has determined to be permanently absent. The individual is subject to the eligibility and screening requirements discussed elsewhere in this chapter.

3-I.M. LIVE-IN AIDE

Live-in aide means a person who resides with one or more elderly persons, or near-elderly persons, or persons with disabilities, and who: (1) is determined to be essential to the care and well-being of the persons, (2) is not obligated for the support of the persons, and (3) would not be living in the unit except to provide the necessary supportive services [24 CFR 5.403].

The PHA must approve a live-in aide if needed as a reasonable accommodation in accordance with 24 CFR 8, to make the program accessible to and usable by a family member with disabilities.

A live-in aide is a member of the household, not the family, and the income of the aide is not considered in income calculations [24 CFR 5.609(c)(5)]. Relatives may be approved as live-in aides if they meet all of the criteria defining a live-in aide. However, a live-in aide is not considered a family member, would not have any rights to the property where he/she is a live-in aide and would not be considered a remaining member of a tenant family.

SFHA Policy

A family's request for a live-in aide must be made in writing. Written verification will be required from a reliable, knowledgeable professional of the family's choosing, such as a doctor, social worker, or case worker, that the live-in aide is essential for the care and well-being of the elderly, near-elderly, or disabled family member. For continued approval, the family must submit a new, written request—subject to PHA verification—at each annual reexamination.

In addition, the family and live-in aide will be required to submit a certification stating that the live-in aide is (1) not obligated for the support of the person(s) needing the care, and (2) would not be living in the unit except to provide the necessary supportive services.

The PHA has the discretion not to approve a particular person as a live-in aide, and may withdraw such approval, if [24 CFR 966.4(d)(3)(i)]:

The person commits fraud, bribery or any other corrupt or criminal act in connection with any federal housing program;

The person has a history of drug-related criminal activity or violent criminal activity; or

The person currently owes rent or other amounts to the SFHA or to another PHA in connection with Housing Choice Voucher Program or Conventional Public Housing Program under the 1937 Act.

Within 30 calendar days of receiving a request for a live-in aide, including all required documentation related to the request, the PHA will notify the family of its decision in writing.

3-I.N. CAREGIVER

A family may request a Caregiver. The form shall be available at the property office and shall be submitted at the same property office where the resident resides. A Caregiver has free access to the unit but is not a Live-in-Aide and shall follow the overnight policy for guests outlined in section 3.I.J above. A Caregiver has no rights to the unit.

PART II: BASIC ELIGIBILITY CRITERIA

3-II.A. INCOME ELIGIBILITY AND TARGETING

Income Limits

HUD is required by law to set income limits that determine the eligibility of applicants for HUD's assisted housing programs, including the public housing program. The income limits are published annually and are based on HUD estimates of median family income in a particular area or county, with adjustments for family size.

Types of Low-Income Families [24 CFR 5.603(b)]

Low-income family. A family whose annual income does not exceed 80 percent of the median income for the area, adjusted for family size.

Very low-income family. A family whose annual income does not exceed 50 percent of the median income for the area, adjusted for family size.

Extremely low-income family. A family whose annual income does not exceed 30 percent of the median income for the area, adjusted for family size.

HUD may establish income ceilings higher or lower than 30, 50, or 80 percent of the median income for an area if HUD finds that such variations are necessary because of unusually high or low family incomes.

Using Income Limits for Eligibility [24 CFR 960.201]

Income limits are used for eligibility only at admission. Eligibility is established by comparing a family's annual income with HUD's published income limits. To be income-eligible, a family must be a *low-income* family.

Using Income Limits for Targeting [24 CFR 960.202(b)]

At least 40 percent of the families admitted to the PHA's public housing program during a PHA fiscal year from the PHA waiting list must be *extremely low-income* families. This is called the “basic targeting requirement”.

If admissions of extremely low-income families to the PHA’s housing choice voucher program during a PHA fiscal year exceed the 75 percent minimum targeting requirement for that program, such excess shall be credited against the PHA’s public housing basic targeting requirement for the same fiscal year.

The fiscal year credit for housing choice voucher program admissions that exceed the minimum voucher program targeting requirement must not exceed the lower of:

- Ten percent of public housing waiting list admissions during the PHA fiscal year
- Ten percent of waiting list admission to the PHA’s housing choice voucher program during the PHA fiscal year
- The number of qualifying low-income families who commence occupancy during the fiscal year of public housing units located in census tracts with a poverty rate of 30 percent or more. For this purpose, qualifying low-income family means a low-income family other than an extremely low-income family.

For discussion of how income targeting is used in tenant selection, see Chapter 4.

3-II.B. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS [24 CFR 5, Subpart E]

Housing assistance is available only to individuals who are U.S. citizens, U.S. nationals (herein referred to as citizens and nationals), or noncitizens that have eligible immigration status. At least one family member must be a citizen, national, or noncitizen with eligible immigration status in order for the family to qualify for any level of assistance.

All applicant families must be notified of the requirement to submit evidence of their citizenship status when they apply. Where feasible, and in accordance with the PHA's Limited English Proficiency Plan, the notice must be in a language that is understood by the individual if the individual is not proficient in English.

Declaration [24 CFR 5.508]

HUD requires each family member to declare whether the individual is a citizen, a national, or an eligible noncitizen, except those members who elect not to contend that they have eligible immigration status. Those who elect not to contend their status are considered to be ineligible noncitizens. For citizens, nationals and eligible noncitizens the declaration must be signed personally by the head, spouse, co-head, and any other family member 18 or older, and by a parent or guardian for minors. The family must identify in writing any family members who elect not to contend their immigration status (see Ineligible Noncitizens below). No declaration is required for live-in aides, foster children, or foster adults.

U.S. Citizens and Nationals

In general, citizens and nationals are required to submit only a signed declaration that claims their status. However, HUD regulations permit the PHA to request additional documentation of their status, such as a passport.

SFHA Policy

Family members who declare citizenship or national status will not be required to provide additional documentation unless the PHA receives information indicating that an individual's declaration may not be accurate.

Eligible Noncitizens

In addition to providing a signed declaration, those declaring eligible noncitizen status must sign a verification consent form and cooperate with PHA efforts to verify their immigration status as described in Chapter 7. The documentation required for establishing eligible noncitizen status varies depending upon factors such as the date the person entered the U.S., the conditions under which eligible immigration status has been granted, the person's age, and the date on which the family began receiving HUD-funded assistance.

Lawful residents of the Marshall Islands, the Federated States of Micronesia, and Palau, together known as the Freely Associated States, or FAS, are eligible for housing assistance under section 141 of the Compacts of Free Association between the U.S. Government and the Governments of the FAS [Public Law 106-504].

Ineligible Noncitizens

Those noncitizens who do not wish to contend their immigration status are required to have their names listed on a non-contending family members listing, signed by the head, spouse, or co-head (regardless of citizenship status), indicating their ineligible immigration status. The PHA is not required to verify a family member's ineligible status and is not required to report an individual's unlawful presence in the U.S. to the United States Citizenship and Immigration Services (USCIS).

Providing housing assistance to noncitizen students is prohibited [24 CFR 5.522]. This prohibition extends to the noncitizen spouse of a noncitizen student as well as to minor children who accompany or follow to join the noncitizen student. Such prohibition does not extend to the citizen spouse of a noncitizen student or to the children of the citizen spouse and noncitizen student. Such a family is eligible for prorated assistance as a mixed family.

Mixed Families

A family is eligible for admission as long as at least one member is a citizen, national, or eligible noncitizen. Families that include eligible and ineligible individuals are considered *mixed families*. Such families will be given notice that their assistance will be prorated, and that they may request a hearing if they contest this determination. See Chapter 6 for a discussion of how rents are prorated, and Chapter 14 for a discussion of informal hearing procedures.

Ineligible Families [24 CFR 5.514(d), (e), and (f)]

A PHA may elect to provide assistance to a family before the verification of the eligibility of the individual or one family member [24 CFR 5.512(b)]. Otherwise, no individual or family may be assisted prior to the affirmative establishment by the PHA that the individual or at least one family member is eligible [24 CFR 5.512(a)].

SFHA Policy

The PHA will not provide assistance to a family before the verification of at least one family member as a citizen, national, or eligible noncitizen.

When a PHA determines that an applicant family does not include any citizens, nationals, or eligible noncitizens, following the verification process, the family will be sent a written notice within 30 calendar days of the determination.

The notice will explain the reasons for the denial of assistance and will advise the family of its right to request an appeal to the United States Citizenship and Immigration Services (USCIS), or to request an informal hearing with the PHA. The informal hearing with the PHA may be requested in lieu of the USCIS appeal, or at the conclusion of the USCIS appeal process. The notice must also inform the applicant family that assistance may not be delayed until the conclusion of the USCIS appeal process, but that it may be delayed pending the completion of the informal hearing process.

Informal hearing procedures are contained in Chapter 14.

Timeframe for Determination of Citizenship Status [24 CFR 5.508(g)]

For new occupants joining the resident family the PHA must verify status at the first interim or regular reexamination following the person's occupancy, whichever comes first.

If an individual qualifies for a time extension for the submission of required documents, the PHA must grant such an extension for no more than 30 days [24 CFR 5.508(h)].

Each family member is required to submit evidence of eligible status only one time during continuous occupancy.

SFHA Policy

The PHA will verify the status of applicants at the time other eligibility factors are determined.

3-II.C. SOCIAL SECURITY NUMBERS [24 CFR 5.216 and 5.218, Notice PIH 2012-10]

The applicant and all members of the applicant's household must disclose the complete and accurate social security number (SSN) assigned to each household member, and the documentation necessary to verify each SSN. A detailed discussion of acceptable documentation is provided in Chapter 7.

Note: These requirements do not apply to noncitizens who do not contend eligible immigration status.

In addition, each participant who has not previously disclosed an SSN, has previously disclosed an SSN that HUD or the SSA determined was invalid, or has been issued a new SSN must submit their complete and accurate SSN and the documentation required to verify the SSN at the time of the next interim or annual reexamination or recertification. Participants age 62 or older as of January 31, 2010, whose determination of eligibility was begun before January 31, 2010, are exempt from this requirement and remain exempt even if they move to a new assisted unit.

The PHA must deny assistance to an applicant family if they do not meet the SSN disclosure and documentation requirements contained in 24 CFR 5.216.

3-II.D. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 5.230]

HUD requires each adult family member, and the head of household, spouse, or co-head, regardless of age, to sign form HUD-9886, Authorization for the Release of Information/

Privacy Act Notice, and other consent forms as needed to collect information relevant to the family's eligibility and level of assistance. Chapter 7 provides detailed information concerning the consent forms and verification requirements.

The PHA must deny admission to the program if any member of the applicant family fails to sign and submit consent forms which allow the PHA to obtain information that the PHA has determined is necessary in administration of the public housing program [24 CFR 960.259(a) and (b)].

PART III: DENIAL OF ADMISSION

3-III.A. OVERVIEW

A family that does not meet the eligibility criteria discussed in Parts I and II, must be denied admission.

In addition, HUD requires or permits the PHA to deny admission based on certain types of current or past behaviors of family members as discussed in this part. The PHA's authority in this area is limited by the Violence against Women Reauthorization Act of 2005 (VAWA), which expressly prohibits the denial of admission to an otherwise qualified applicant on the basis that the applicant is or has been the victim of domestic violence, dating violence, or stalking [24 CFR 5.2005].

This part covers the following topics:

- Required denial of admission
- Other permitted reasons for denial of admission
- Screening
- Criteria for deciding to deny admission
- Prohibition against denial of admission to victims of domestic violence, dating violence, or stalking
- Notice of eligibility or denial

3-III.B. REQUIRED DENIAL OF ADMISSION [24 CFR 960.204]

PHAs are required to establish standards that prohibit admission of an applicant to the public housing program if they have engaged in certain criminal activity or if the PHA has reasonable cause to believe that a household member's current use or pattern of use of illegal drugs, or current abuse or pattern of abuse of alcohol may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

Where the statute requires that the PHA prohibit admission for a prescribed period of time after some disqualifying behavior or event, the PHA may choose to continue that prohibition for a longer period of time [24 CFR 960.203(c)(3)(ii)].

HUD requires the PHA to deny assistance in the following cases:

- Any member of the household has been evicted from federally-assisted housing in the last three (3) years for drug-related criminal activity.

SFHA Policy

The PHA will admit an otherwise-eligible family who was evicted from federally-assisted housing within the past three (3) years for drug-related criminal activity, if the PHA is able to verify that the household member who engaged in the criminal activity

has completed a supervised drug rehabilitation program approved by the PHA, or the person who committed the crime is no longer living in the household.

- The PHA determines that any household member is currently engaged in the use of illegal drugs. *Drugs* means a controlled substance as defined in section 102 of the Controlled Substances Act [21 U.S.C. 802]. *Currently engaged in the illegal use of a drug* means a person has engaged in the behavior recently enough (within twelve months) to justify a reasonable belief that there is continuing illegal drug use by a household member [24 CFR 960.205(b)(1)].
- The PHA has reasonable cause to believe that any household member's current use or pattern of use of illegal drugs, or current abuse or pattern of abuse of alcohol, may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

SFHA Policy

In determining reasonable cause, the PHA will consider all credible evidence, including but not limited to, any record of convictions, arrests, or evictions of household members related to the use of illegal drugs or the abuse of alcohol. A conviction will be given more weight than an arrest. The PHA will also consider evidence from treatment providers or community-based organizations providing services to household members.

- Any household member has ever been convicted of drug-related criminal activity for the production or manufacture of methamphetamine on the premises of federally assisted housing.
- Any household member is subject to a lifetime registration requirement under a state sex offender registration program.

3-III.C. OTHER PERMITTED REASONS FOR DENIAL OF ADMISSION

HUD permits, but does not require the PHA to deny admission for the reasons discussed in this section.

Criminal Activity [24 CFR 960.203 (b) and (c)]

Under the Public Housing Assessment System (PHAS), PHAs that have adopted policies, implemented procedures and can document that they successfully screen out and deny admission to certain applicants with unfavorable criminal histories receive points.

The PHA is responsible for screening family behavior and suitability for tenancy. In doing so, the PHA may consider an applicant's history of criminal activity involving crimes of physical violence to persons or property and other criminal acts which would adversely affect the health, safety or welfare of other tenants.

SFHA Policy

If any household member is currently engaged in, or has engaged in any of the following criminal activities, within the past five years, the family will be denied admission.

Drug-related criminal activity, defined by HUD as the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug [24 CFR 5.100].

Violent criminal activity, defined by HUD as any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage [24 CFR 5.100].

Criminal activity that may threaten the health, safety, or welfare of other tenants [24 CFR 960.203(c)(3)].

Criminal activity that may threaten the health or safety of PHA staff, contractors, subcontractors, or agents.

Criminal sexual conduct, including but not limited to sexual assault, incest, open and gross lewdness, or child abuse.

Evidence of such criminal activity includes, but is not limited to any record of convictions, arrests, or evictions for suspected drug-related or violent criminal activity of household members within the past 5 years. A conviction for such activity will be given more weight than an arrest or an eviction.

In making its decision to deny assistance, the PHA will consider the factors discussed in Sections 3-III.E and 3-III.F. Upon consideration of such factors, the PHA may, on a case-by-case basis, decide not to deny assistance.

Previous Behavior [960.203(c) and (d) and PH Occ GB, p. 48]

HUD authorizes the PHA to deny admission based on relevant information pertaining to the family's previous behavior and suitability for tenancy.

In the event of the receipt of unfavorable information with respect to an applicant, the PHA must consider the time, nature, and extent of the applicant's conduct (including the seriousness of the offense). As discussed in Section 3-III.F, the PHA may also need to consider whether the cause of the unfavorable information may be that the applicant is the victim of domestic violence, dating violence, or stalking.

SFHA Policy

The PHA will deny admission to an applicant family if the PHA determines that the family:

The family does not provide information that the PHA or HUD determines is necessary in the administration of the program.

Any PHA has ever terminated assistance under the program for any member of the family.

Has a pattern of disturbance of neighbors, destruction of property, or living or housekeeping habits at prior residences within the past five years which may adversely affect the health, safety, or welfare of other tenants

Has a pattern of eviction from housing or termination from residential programs within the past five years (considering relevant circumstances)

Owes rent or other amounts to this or any other PHA or owner in connection with any assisted housing program, including breach of the terms of a repayment agreement entered into with the PHA, unless the family repays the full amount of the debt covered in the repayment agreement prior to being selected from the waiting list.

The family does not provide complete and true information to the PHA. Misrepresented or does not provide complete information related to eligibility, including income, award of preferences for admission, expenses, family composition or rent

Has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program

Has engaged in or threatened violent or abusive behavior toward PHA personnel

Abusive or violent behavior towards PHA personnel includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.

Threatening refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.

In making its decision to deny admission, the PHA will consider the factors discussed in Sections 3-III.E and 3-III.F. Upon consideration of such factors, the PHA may, on a case-by-case basis, decide not to deny admission.

3-III.D. SCREENING

Screening for Eligibility

PHAs are authorized to obtain criminal conviction records from law enforcement agencies to screen applicants for admission to the public housing program. This authority assists the PHA in complying with HUD requirements and PHA policies to deny assistance to applicants who are engaging in or have engaged in certain criminal activities. In order to obtain access to the records the PHA must require every applicant family to submit a consent form signed by each adult household member [24 CFR 5.903].

The PHA may not pass along to the applicant the costs of a criminal records check [24 CFR 960.204(d)].

SFHA Policy

The PHA will perform criminal background checks through third party services. The PHA may use the criminal records system of the City and County of San Francisco, the State of California, the NCIC, and other states and/or municipalities as well as local law enforcement to check for criminal history for all adult household members.

If the results of the criminal background check indicate there may have been past criminal activity, but the results are inconclusive, the PHA will request a fingerprint card and will request information from the National Crime Information Center (NCIC) or the PHA may obtain the information for a similar agency.

PHAs are required to perform criminal background checks necessary to determine whether any household member is subject to a lifetime registration requirement under a state sex offender program in the state where the housing is located, as well as in any other state where a household member is known to have resided [24 CFR 960.204(a)(4)].

If the PHA proposes to deny admission based on a criminal record or on lifetime sex offender registration information, the PHA must notify the household of the proposed action and must provide the subject of the record and the applicant a copy of the record and an opportunity to dispute the accuracy and relevance of the information prior to a denial of admission [24 CFR 5.903(f) and 5.905(d)].

Obtaining Information from Drug Treatment Facilities [24 CFR 960.205]

HUD authorizes PHAs to request and obtain information from drug abuse treatment facilities concerning applicants. Specifically, the PHA may require each applicant to submit for all household members who are at least 18 years of age, and for each family head, spouse, or co-head regardless of age, one or more consent forms signed by such household members that requests any drug abuse treatment facility to inform the PHA whether the drug abuse treatment facility has reasonable cause to believe that the household member is currently engaging in illegal drug use.

Drug Abuse Treatment Facility means an entity that holds itself out as providing, and provides, diagnosis, treatment, or referral for treatment with respect to the illegal drug use, and is either an identified unit within a general care facility, or an entity other than a general medical care facility.

Currently engaging in illegal use of a drug means illegal use of a drug that occurred recently enough to justify a reasonable belief that there is continuing illegal drug use by a household member.

Any consent form used for the purpose of obtaining information from a drug abuse treatment facility to determine whether a household member is currently engaging in illegal drug use must expire automatically after the PHA has made a final decision to either approve or deny the admission of such person.

Any charges incurred by the PHA for information provided from a drug abuse treatment facility may not be passed on to the applicant or tenant.

If the PHA chooses to obtain such information from drug abuse treatment facilities, it must adopt and implement one of the two following policies:

Policy A: The PHA must submit a request for information to a drug abuse treatment facility for all families before they are admitted. The request must be submitted for each proposed household member who is at least 18 years of age, and for each family head, spouse, or co-head regardless of age.

Policy B: The PHA must submit a request for information only for certain household members, whose criminal record indicates prior arrests or conviction for any criminal activity that may be a basis for denial of admission or whose prior tenancy records indicate that the proposed household member engaged in destruction of property or violent activity against another person, or they interfered with the right of peaceful enjoyment of the premises of other residents.

If the PHA chooses to obtain such information, it must abide by the HUD requirements for records management and confidentiality as described in 24 CFR 960.205(f).

SFHA Policy

The PHA will obtain information from drug abuse treatment facilities to determine whether any applicant family's household members are currently engaging in illegal drug activity only when the PHA has determined that the family will be denied admission based on a family member's drug-related criminal activity, and the family claims that the

culpable family member has successfully completed a supervised drug or alcohol rehabilitation program.

Screening for Suitability as a Tenant [24 CFR 960.203(c)]

The PHA is responsible for the screening and selection of families to occupy public housing units. The PHA may consider all relevant information. Screening is important to public housing communities and program integrity, and to ensure that assisted housing is provided to those families that will adhere to lease obligations.

SFHA Policy

The PHA will consider the family's history with respect to the following factors:

Payment of rent and utilities

Caring for a unit and premises

Respecting the rights of other residents to the peaceful enjoyment of their housing

Criminal activity that is a threat to the health, safety, or property of others

Behavior of all household members as related to the grounds for denial as detailed in Sections 3-III. B and C

Compliance with any other essential conditions of tenancy

Resources Used to Check Applicant Suitability [PH Occ GB, pp. 47-56]

PHAs have a variety of resources available to them for determination of the suitability of applicants. Generally, PHAs should reject applicants who have recent behavior that would warrant lease termination for a public housing resident.

SFHA Policy

In order to determine the suitability of applicants the PHA will examine applicant history for the past five years. Such background checks will include:

Past Performance in Meeting Financial Obligations, Especially Rent

PHA and landlord references for the past five years, gathering information about past performance meeting rental obligations such as rent payment record, late payment record, whether the PHA/landlord ever began or completed lease termination for non-payment, and whether utilities were ever disconnected in the unit. PHAs and landlords will be asked if they would rent to the applicant family again.

Utility company references covering the monthly amount of utilities, late payment, disconnection, return of a utility deposit and whether the applicant can get utilities turned on in his/her name. (Use of this inquiry will be reserved for applicants applying for units where there are tenant-paid utilities.)

If an applicant has no rental payment history the PHA will check court records of eviction actions and other financial judgments, and credit reports. A lack of credit

history will not disqualify someone from becoming a public housing resident, but a poor credit rating may.

Applicants with no rental payment history will also be asked to provide the PHA with personal references. The references will be requested to complete a verification of the applicant's ability to pay rent if no other documentation of ability to meet financial obligations is available. The applicant will also be required to complete a checklist documenting their ability to meet financial obligations.

If previous landlords or the utility company do not respond to requests from the PHA, the applicant may provide other documentation that demonstrates their ability to meet financial obligations (e.g. rent receipts, cancelled checks, etc.)

Disturbances of Neighbors, Destruction of Property or Living or Housekeeping Habits at Prior Residences that May Adversely Affect Health, Safety, or Welfare of Other Tenants, or Cause Damage to the Unit or the Development

PHA and landlord references for the past five years, gathering information on whether the applicant kept a unit clean, safe and sanitary; whether they violated health or safety codes; whether any damage was done by the applicant to a current or previous unit or the development, and, if so, how much the repair of the damage cost; whether the applicant's housekeeping caused insect or rodent infestation; and whether the neighbors complained about the applicant or whether the police were ever called because of disturbances.

Police and court records within the past five (5) years will be used to check for any evidence of disturbance of neighbors or destruction of property that might have resulted in arrest or conviction.

A personal reference will be requested to complete a verification of the applicant's ability to care for the unit and avoid disturbing neighbors if no other documentation is available. In these cases, the applicant will also be required to complete a checklist documenting their ability to care for the unit and to avoid disturbing neighbors.

Home visits may be used to determine the applicant's ability to care for the unit.

3-III.E. CRITERIA FOR DECIDING TO DENY ADMISSION

Evidence

SFHA Policy

The PHA will use the concept of the preponderance of the evidence as the standard for making all admission decisions.

Preponderance of the evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not. Preponderance of the evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

Consideration of Circumstances [24 CFR 960.203(c)(3) and (d)]

HUD authorizes the PHA to consider all relevant circumstances when deciding whether to deny admission based on a family's past history except in the situations for which denial of admission is mandated (see Section 3-III.B).

In the event the PHA receives unfavorable information with respect to an applicant, consideration must be given to the time, nature, and extent of the applicant's conduct (including the seriousness of the offense). In a manner consistent with its policies, PHAs may give consideration to factors which might indicate a reasonable probability of favorable future conduct.

SFHA Policy

The PHA will consider the following factors prior to making its decision:

The seriousness of the case, especially with respect to how it would affect other residents

The effect(s) that denial of admission may have on other members of the family who were not involved in the action or failure

The extent of participation or culpability of individual family members, including whether the culpable family member is a minor or a person with disabilities, or (as discussed further in section 3-III.F) a victim of domestic violence, dating violence, or stalking.

The length of time since the violation occurred, the family's recent history and the likelihood of favorable conduct in the future

Evidence of the applicant family's participation in or willingness to participate in social service or other appropriate counseling service programs

In the case of drug or alcohol abuse, whether the culpable household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program or has otherwise been rehabilitated successfully

The PHA will require the applicant to submit evidence of the household member's current participation in or successful completion of a supervised drug or alcohol rehabilitation program, or evidence of otherwise having been rehabilitated successfully.

Removal of a Family Member's Name from the Application [24 CFR 960.203(c)(3)(i)]

HUD permits PHAs to impose as a condition of admission, a requirement that family members who participated in or were culpable for an action or failure to act which warrants denial of admission, to not reside in the unit.

SFHA Policy

As a condition of receiving assistance, a family may agree to remove the culpable family member from the application. In such instances, the head of household must certify that the family member will not be permitted to visit or to stay as a guest in the assisted unit.

After admission to the program, the family must present evidence of the former family member's current address upon PHA request.

Reasonable Accommodation [PH Occ GB, pp. 58-60]

If the family includes a person with disabilities, the PHA's decision concerning denial of admission is subject to consideration of reasonable accommodation in accordance with 24 CFR Part 8.

SFHA Policy

If the family indicates that the behavior of a family member with a disability is the reason for the proposed denial of admission, the PHA will determine whether the behavior is related to the disability. If so, upon the family's request, the PHA will determine whether alternative measures are appropriate as a reasonable accommodation. The PHA will only consider accommodations that can reasonably be expected to address the behavior that is the basis of the proposed denial of admission. See Chapter 2 for a discussion of reasonable accommodation.

3-III.F. PROHIBITION AGAINST DENIAL OF ASSISTANCE TO VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, AND STALKING [24 CFR Part 5, Subpart L]

The Violence against Women Reauthorization Act of 2005 (VAWA) prohibits denial of admission to an otherwise qualified applicant on the basis that the applicant is or has been a victim of domestic violence, dating violence, or stalking. Specifically, Section 607(2) of VAWA adds the following provision to Section 6 of the U.S. Housing Act of 1937, which lists contract provisions and requirements for the public housing program:

Every contract for contributions shall provide that . . . the public housing agency shall not deny admission to the project to any applicant on the basis that the applicant is or has been a victim of domestic violence, dating violence, or stalking if the applicant otherwise qualifies for assistance or admission, and that nothing in this section shall be construed to supersede any provision of any Federal, State, or local law that provides greater protection than this section for victims of domestic violence, dating violence, or stalking.

Definitions [24 CFR 5.2003]

As used in VAWA:

- The term *bifurcate* means, with respect to a public housing or Section 8 lease, to divide a lease as a matter of law such that certain tenants can be evicted or removed while the remaining family members' lease and occupancy rights are allowed to remain intact.
- The term *domestic violence* includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.
- The term *dating violence* means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - The length of the relationship
 - The type of relationship
 - The frequency of interaction between the persons involved in the relationship

- The term *stalking* means:
 - To follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate; or
 - To place under surveillance with the intent to kill, injure, harass, or intimidate another person; and
 - In the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to (1) that person, (2) a member of the immediate family of that person, or (3) the spouse or intimate partner of that person.
- The term *immediate family member* means, with respect to a person –
 - A spouse, parent, brother or sister, or child of that person, or an individual to whom that person stands in the position or place of a parent; or
 - Any other person living in the household of that person and related to that person by blood and marriage.

Notification

SFHA Policy

The PHA acknowledges that a victim of domestic violence, dating violence, or stalking may have an unfavorable history (e.g., a poor credit history, a record of previous damage to an apartment, a prior arrest record) that would warrant denial under the PHA's policies. Therefore, if the PHA makes a determination to deny admission to an applicant family, the PHA will include in its notice of denial:

A statement of the protection against denial provided by VAWA

A description of PHA confidentiality requirements

A request that an applicant wishing to claim this protection submit to the PHA documentation meeting the specifications below with her or his request for an informal hearing (see section 14-I.B)

Documentation

Victim Documentation

SFHA Policy

An applicant claiming that the cause of an unfavorable history is that a member of the applicant family is or has been a victim of domestic violence, dating violence, or stalking must provide documentation demonstrating the connection between the abuse and the unfavorable history. The documentation may consist of any of the following:

A statement signed by the victim certifying that the information provided is true and correct and that it describes bona fide incident(s) of actual or threatened domestic violence, dating violence, or stalking

A police or court record documenting the domestic violence, dating violence, or stalking

Documentation signed by a person who has assisted the victim in addressing domestic violence, dating violence, or stalking, or the effects of such abuse. This person may be an employee, agent, or volunteer of a victim service provider; an attorney; or a medical or other knowledgeable professional. The person signing the documentation must attest under penalty of perjury to the person's belief that the incidents in question are bona fide incidents of abuse. The victim must also sign the documentation.

Time Frame for Submitting Documentation

SFHA Policy

An individual who claims protection against adverse action based on an incident or incidents of actual or threatened domestic violence, dating violence or stalking, and who is requested by SFHA, or a Housing Choice Voucher Program owner or manager to provide verification, must provide such verification within 14 business days (*i.e.*, 14 calendar days, excluding Saturdays, Sundays, and federally-recognized holidays) after receipt of the request for verification. Failure to provide verification, in proper form within such time will result in loss of protection under VAWA and this policy against a proposed adverse action. [42 U.S.C. § 1437f(ee)(2)(A)(2006); 42 U.S.C. § 1437d(u)(2)(A) (2006).

The applicant must submit the required documentation within the time frame provided to the applicant by the SFHA or must request an extension in writing. If the applicant so requests, the SFHA will grant an extension of ten (10) business days and will postpone scheduling the applicant's informal hearing until after it has received the documentation or the extension period has elapsed. If, after reviewing the documentation provided by the applicant, the SFHA determines that the family is eligible for assistance, no informal hearing will be scheduled, and the SFHA will proceed with admission of the applicant family.

PHA Confidentiality Requirements [24 CFR 5.2007(a)(1)(5)]

All information provided to the PHA regarding domestic violence, dating violence, or stalking, including the fact that an individual is a victim of such violence or stalking, must be retained in confidence and may neither be entered into any shared database nor provided to any related entity, except to the extent that the disclosure (a) is requested or consented to by the individual in writing, (b) is required for use in an eviction proceeding, or (c) is otherwise required by applicable law.

Disclosure may be used in an eviction procedure if it is related to whether the incident or incidents in question qualify as a serious or repeated violation of the lease or criminal activity directly relating to domestic violence, or stalking; disclosure is otherwise required by law. [42 U.S. C. § 1437d(u)(2)(A)(2006)]

If disclosure is required for use in an eviction proceeding or is otherwise required by applicable law, the PHA will inform the victim before disclosure occurs so that safety risks can be identified and addressed.

3-III.G. NOTICE OF ELIGIBILITY OR DENIAL

The PHA will notify an applicant family of its final determination of eligibility in accordance with the policies in Section 4-III.E.

If a PHA uses a criminal record or sex offender registration information obtained under 24 CFR 5, Subpart J, as the basis of a denial, a copy of the record must precede the notice to deny, with an opportunity for the applicant to dispute the accuracy and relevance of the information before the PHA can move to deny the application. In addition, a copy of the record must be provided to the subject of the record [24 CFR 5.903(f) and 5.905(d)].

SFHA Policy

If, based on a criminal record or sex offender registration information an applicant family appears to be ineligible, the PHA will notify the family in writing of the proposed denial and provide a copy of the record to the applicant and to the subject of the record. The family will be given 10 business days to dispute the accuracy and relevance of the information. If the family does not contact the PHA to dispute the information within that 10 day period, the PHA will proceed with issuing the notice of denial of admission. A family that does not exercise their right to dispute the accuracy of the information prior to issuance of the official denial letter will still be given the opportunity to do so as part of the informal hearing process. (See Chapter 14)

Notice requirements related to denying admission to noncitizens are contained in Section 3-II.B.

Notice policies related to denying admission to applicants who may be victims of domestic violence, dating violence, or stalking are contained in Section 3-III.F.

EXHIBIT 3-1: DETAILED DEFINITIONS RELATED TO DISABILITIES

Person with Disabilities [24 CFR 5.403]

The term *person with disabilities* means a person who has any of the following types of conditions.

- Has a disability, as defined in 42 U.S.C. Section 423(d)(1)(A), which reads:

Inability to engage in any substantial gainful activity by reason of any medically determinable physical or mental impairment which can be expected to result in death or which has lasted or can be expected to last for a continuous period of not less than 12 months

In the case of an individual who has attained the age of 55 and is blind (within the meaning of “blindness” as defined in section 416(i)(1) of this title), inability by reason of such blindness to engage in substantial gainful activity, requiring skills or ability comparable to those of any gainful activity in which he has previously engaged with some regularity and over a substantial period of time.
- Has a developmental disability as defined in the Developmental Disabilities Assistance and Bill of Rights Act of 2000 [42 U.S.C.15002(8)], which defines developmental disability in functional terms as follows:

(A) **IN GENERAL** – The term *developmental disability* means a severe, chronic disability of an individual that-

 - (i) is attributable to a mental or physical impairment or combination of mental and physical impairments;
 - (ii) is manifested before the individual attains age 22;
 - (iii) is likely to continue indefinitely;
 - (iv) results in substantial functional limitations in 3 or more of the following areas of major life activity: (I) self-care, (II) receptive and expressive language, (III) learning, (IV) mobility, (V) self-direction, (VI) capacity for independent living, (VII) economic self-sufficiency; and
 - (v) reflects the individual’s need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

(B) **INFANTS AND YOUNG CHILDREN** – An individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting 3 or more of the criteria described in clauses (i) through (v) of subparagraph (A) if the individual, without services and supports, has a high probability of meeting those criteria later in life.
- Has a physical, mental, or emotional impairment that is expected to be of long-continued and indefinite duration; substantially impedes his or her ability to live independently, and is of

such a nature that the ability to live independently could be improved by more suitable housing conditions.

People with the acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for AIDS are not excluded from this definition.

A person whose disability is based solely on any drug or alcohol dependence does not qualify as a person with disabilities for the purposes of this program.

For purposes of reasonable accommodation and program accessibility for persons with disabilities, the term person with disabilities refers to an individual with handicaps.

Individual with Handicaps [24 CFR 8.3]

Individual with handicaps means any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such an impairment; or is regarded as having such an impairment. The term does not include any individual who is an alcoholic or drug abuser whose current use of alcohol or drugs prevents the individual from participating in the program or activity in question, or whose participation, by reason of such current alcohol or drug abuse, would constitute a direct threat to property or the safety of others. As used in this definition, the phrase:

(1) Physical or mental impairment includes:

- (a) Any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine
- (b) Any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term physical or mental impairment includes, but is not limited to, such diseases and conditions as orthopedic, visual, speech and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, drug addiction and alcoholism.

(2) Major life activities means functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working.

(3) Has a record of such an impairment means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities.

(4) Is regarded as having an impairment means:

- (a) Has a physical or mental impairment that does not substantially limit one or more major life activities but that is treated by a recipient as constituting such a limitation
- (b) Has a physical or mental impairment that substantially limits one or more major life activities only as a result of the attitudes of others toward such impairment

(c) Has none of the impairments defined in paragraph (a) of this section but is treated by a recipient as having such an impairment

Chapter 4

APPLICATIONS, WAITING LIST AND TENANT SELECTION

INTRODUCTION

When a family wishes to reside in public housing, the family must submit an application that provides the PHA with the information needed to determine the family's eligibility. HUD requires the PHA to place all eligible families that apply for public housing on a waiting list. When a unit becomes available, the PHA must select families from the waiting list in accordance with HUD requirements and PHA policies as stated in its Admissions and Continued Occupancy Policy (ACOP) and its annual plan.

The PHA is required to adopt a clear approach to accepting applications, placing families on the waiting list, and selecting families from the waiting list, and must follow this approach consistently. The actual order in which families are selected from the waiting list can be affected if a family has certain characteristics designated by HUD or the PHA to receive preferential treatment.

HUD regulations require that the PHA comply with all equal opportunity requirements and it must affirmatively further fair housing goals in the administration of the program [24 CFR 960.103, PH Occ GB p. 13]. Adherence to the selection policies described in this chapter ensures that the PHA will be in compliance with all relevant fair housing requirements, as described in Chapter 2.

This chapter describes HUD and PHA policies for taking applications, managing the waiting list and selecting families from the waiting list. The PHAs policies for assigning unit size and making unit offers are contained in Chapter 5. Together, Chapters 4 and 5 of the ACOP comprise the PHA's Tenant Selection and Assignment Plan (TSAP).

The policies outlined in this chapter are organized into three sections, as follows:

Part I: The Application Process. This part provides an overview of the application process, and discusses how applicants can obtain and submit applications. It also specifies how the PHA will handle the applications it receives.

Part II: Managing the Waiting List. This part presents the policies that govern how the PHA's waiting list is structured, when it is opened and closed, and how the public is notified of the opportunity to apply for public housing. It also discusses the process the PHA will use to keep the waiting list current.

Part III: Tenant Selection. This part describes the policies that guide the PHA in selecting families from the waiting list as units become available. It also specifies how in-person interviews will be used to ensure that the PHA has the information needed to make a final eligibility determination.

PART I: THE APPLICATION PROCESS

4-I.A. OVERVIEW

This part describes the policies that guide the PHA's efforts to distribute and accept applications, and to make preliminary determinations of applicant family eligibility that affect placement of the family on the waiting list. This part also describes the PHA's obligation to ensure the accessibility of the application process.

4-I.B. APPLYING FOR ASSISTANCE

Any family that wishes to reside in public housing must apply for admission to the program [24 CFR 1.4(b)(2)(ii), 24 CFR 960.202(a)(2)(iv), and PH Occ GB, p. 68]. HUD permits the PHA to determine the format and content of its applications, as well how such applications will be made available to interested families and how applications will be accepted by the PHA. However, the PHA must include Form HUD-92006, Supplement to Application for Federally Assisted Housing, as part of the PHA's application [Notice PIH 2009-36]. The PHA shall notify applicants of their right to include as part of their application the name, address, telephone number and other relevant information of a family member, friend, or social, health, advocacy or other organization.

SFHA Policy

When the waitlist is open, applications for housing will be accepted and entered into the SFHA database, by date and time of receipt.

When it is expected that a family will be selected from the waiting list within 60 days of the date of application, the SFHA will send the family a Notice requesting an initial application appointment to determine eligibility. The Notice will include the date and time of the application appointment. If the family fails to attend the application meeting, the applicant will be removed from the waitlist.

At application, the family will be required to provide all of the information necessary to establish family eligibility and the amount of rent the family will pay when selected from the waiting list.

Families may obtain application forms, when the waitlist is open, at 1815 Egbert Avenue, San Francisco, CA, during standard business hours and/or on the SFHA website (www.sfha.org). As a reasonable accommodation for persons with disabilities, disabled families may also request – by telephone or by mail – that an application form be mailed to the family.

Completed applications must be returned to 1815 Egbert Avenue, San Francisco, CA 94124 in person during normal business hours. Applications must be complete in order to be accepted by the PHA for processing. If an application is incomplete, the PHA will notify the family of the additional information required.

4-I.C. ACCESSIBILITY OF THE APPLICATION PROCESS

The PHA must take a variety of steps to ensure that the application process is accessible to those people who might have difficulty complying with the normal, standard PHA application process.

Disabled Populations [24 CFR 8; PH Occ GB, p. 68]

The PHA must provide reasonable accommodation to the needs of individuals with disabilities. The application-taking facility and the application process must be fully accessible, or the PHA must provide an alternate approach that provides equal access to the application process. Chapter 2 provides a full discussion of the PHA's policies related to providing reasonable accommodations for people with disabilities.

Limited English Proficiency

PHAs are required to take reasonable steps to ensure meaningful access to their programs and activities by persons with limited English proficiency [24 CFR 1]. Chapter 2 provides a full discussion on the PHA's policies related to ensuring access to people with limited English proficiency (LEP).

4-I.D. PLACEMENT ON THE WAITING LIST

The PHA must review each completed application received and make a preliminary assessment of the family's eligibility. The PHA must place on the waiting list families for whom the list is open unless the PHA determines the family to be ineligible. Where the family is determined to be ineligible, the PHA must notify the family in writing [24 CFR 960.208(a); PH Occ GB, p. 41]. Where the family is not determined to be ineligible, the family will be placed on a waiting list of applicants.

No applicant has a right or entitlement to be listed on the waiting list, or to any particular position on the waiting list.

Ineligible for Placement on the Waiting List

SFHA Policy

If the PHA can determine from the information provided that a family is ineligible, the family will not be placed on the waiting list. Where a family is determined to be ineligible, the PHA will send written notification of the ineligibility determination within 30 calendar days of receiving a completed application. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal hearing and explain the process for doing so (see Chapter 14).

Eligible for Placement on the Waiting List

SFHA Policy

The PHA will send written notification of the preliminary eligibility determination within 30 calendar days of receiving a completed application. If applicable, the notice will also indicate the waiting list preference(s) for which the family appears to qualify.

Placement on the waiting list does not indicate that the family is, in fact, eligible for admission. A final determination of eligibility and qualification for preferences will be made when the family is selected from the waiting list.

Applicants will be placed on the waiting list according to PHA preference(s) and the date and time their complete application is received by the PHA.

The PHA will assign families on the waiting list according to the bedroom size for which a family qualifies as established in its occupancy standards (see Chapter 5). Families may request to be placed on the waiting list for a unit size smaller than designated by the occupancy guidelines. However, in these cases, the family must agree not to request a transfer for two years after admission, unless they have a change in family size or composition.

PART II: MANAGING THE WAITING LIST

4-II.A. OVERVIEW

The PHA must have policies regarding the type of waiting list it will utilize as well as the various aspects of organizing and managing the waiting list of applicant families. This includes opening the list to new applicants, closing the list to new applicants, notifying the public of waiting list openings and closings, updating waiting list information, purging the list of families that are no longer interested in or eligible for public housing, and conducting outreach to ensure a sufficient number of applicants.

In addition, HUD imposes requirements on how the PHA may structure its waiting list and how families must be treated if they apply for public housing at a PHA that administers more than one assisted housing program.

4-II.B. ORGANIZATION OF THE WAITING LIST

The PHA's public housing waiting list must be organized in such a manner to allow the PHA to accurately identify and select families in the proper order, according to the admissions policies described in this ACOP.

SFHA Policy

The waiting list will contain the following information for each applicant listed:

- Name and social security number of head of household (At least one member of the family must have a Social Security Number);
- Unit size required (number of family members)
- Amount and source of annual income
- Accessibility requirement, if any
- Date and time of application or application number
- Household type (family, elderly, disabled)
- Admission preference, if any
- Race and ethnicity of the head of household
- The specific site(s) selected (only if PHA offers site-based waiting lists)

The PHA may adopt one community-wide waiting list or site-based waiting lists. The PHA must obtain approval from HUD through submission of its Annual Plan before it may offer site-based waiting lists. Site-based waiting lists allow families to select the development where they wish to reside and must be consistent with all applicable civil rights and fair housing laws and regulations [24 CFR 903.7(b)(2)].

SFHA Policy

The PHA will maintain one single community-wide waiting list for its developments. Within the list, the PHA will designate subparts to easily identify who should be offered the next available unit (i.e. mixed populations, general occupancy, unit size, and accessible units).

Pursuant to existing Internal Revenue Service statutes (IRS), California Tax Credit Allocation Committee (CTAC) requirements, and subject to the review and approval of the SFHA, each tax-credit HOPE VI development and designated HOPE SF, a site may implement its own marketing plan, accept and process applications based on its local preferences, manage its own site-based waiting lists and on-site transfer policy. In so doing, all applicable federal laws, executed contract requirements, and agreements, and other non-conflicting local policies shall be fully complied.

The PHA will not merge the public housing waiting list with the waiting list for any other program the PHA operates.

4-II.C. OPENING AND CLOSING THE WAITING LIST

Closing the Waiting List

The PHA is permitted to close the waiting list, in whole or in part, if it has an adequate pool of families to fill its developments. The PHA may close the waiting list completely, or restrict intake by preference, type of project, or by size and type of dwelling unit. [PH Occ GB, p. 31].

SFHA Policy

The PHA will close the waiting list when the estimated waiting period for housing applicants on the list reaches 120 months for the most current applicants. Where the PHA has particular preferences or other criteria that require a specific category of family, the PHA may elect to continue to accept applications from these applicants while closing the waiting list to others.

Reopening the Waiting List

If the waiting list has been closed, it may be reopened at any time. The PHA should publish a notice in local newspapers of general circulation, minority media, and other suitable media outlets that the PHA is reopening the waiting list. Such notice must comply with HUD fair housing requirements. The PHA should specify who may apply, and where and when applications will be received.

SFHA Policy

The PHA will announce the reopening of the waiting list at least 10 business days prior to the date applications will first be accepted. If the list is only being reopened for certain categories of families, this information will be contained in the notice. The notice will specify where, when, and how applications are to be received.

The PHA will give public notice by publishing the relevant information in suitable media outlets.

4-II.D. FAMILY OUTREACH [24 CFR 903.2(d); 24 CFR 903.7(a) and (b)]

The PHA should conduct outreach as necessary to ensure that the PHA has a sufficient number of applicants on the waiting list to fill anticipated vacancies and to assure that the PHA is affirmatively furthering fair housing and complying with the Fair Housing Act.

Because HUD requires the PHA to serve a specified percentage of extremely low income families, the PHA may need to conduct special outreach to ensure that an adequate number of such families apply for public housing.

PHA outreach efforts must comply with fair housing requirements. This includes:

- Analyzing the housing market area and the populations currently being served to identify underserved populations
- Ensuring that outreach efforts are targeted to media outlets that reach eligible populations that are underrepresented in the program
- Avoiding outreach efforts that prefer or exclude people who are members of a protected class

PHA outreach efforts must be designed to inform qualified families about the availability of units under the program. These efforts may include, as needed, any of the following activities:

- Submitting press releases to local newspapers, including minority newspapers
- Developing informational materials and flyers to distribute to other agencies
- Providing application forms to other public and private agencies that serve the low income population
- Developing partnerships with other organizations that serve similar populations, including agencies that provide services for persons with disabilities

SFHA Policy

The PHA will monitor the characteristics of the population being served and the characteristics of the population as a whole in the PHA's jurisdiction. Targeted outreach efforts will be undertaken if a comparison suggests that certain populations are being underserved.

4-II.E. REPORTING CHANGES IN FAMILY CIRCUMSTANCES

SFHA Policy

While the family is on the waiting list, the family must inform the PHA, within ten (10) business days, of changes in family size or composition, preference status, or contact information, including current residence, mailing address, and phone number. The changes must be submitted in writing.

Changes in an applicant's circumstances while on the waiting list may affect the family's qualification for a particular bedroom size or entitlement to a preference. When an applicant reports a change that affects their placement on the waiting list, the waiting list will be updated accordingly.

4-II.F. UPDATING THE WAITING LIST

HUD requires the PHA to establish policies to use when removing applicant names from the waiting list [24 CFR 960.202(a)(2)(iv)].

Purging the Waiting List

The decision to withdraw an applicant family that includes a person with disabilities from the waiting list is subject to reasonable accommodation. If the applicant did not respond to the PHA's request for information or updates because of the family member's disability, the PHA must, upon the family's request, reinstate the applicant family to their former position on the waiting list as a reasonable accommodation [24 CFR 8.4(a), 24 CFR 100.204(a), and PH Occ GB, p. 39 and 40]. See Chapter 2 for further information regarding reasonable accommodations.

SFHA Policy

The waiting list will be updated as needed to ensure that all applicants and applicant information is current and timely.

To update the waiting list, the PHA will send an update request via first class mail or e-mail (if an e-mail address is provided to the SFHA) to each family on the waiting list to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the last address, residential or e-mail, that the PHA has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list.

The family's response must be in writing and may be delivered in person, by mail, e-mail, or by fax. Responses should be postmarked or received by the PHA not later than 15 business days from the date of the PHA's original correspondence.

If the family fails to respond within 15 business days, the family will be removed from the waiting list without further notice.

If the notice is returned by the post office with no forwarding address, the applicant will be removed from the waiting list without further notice.

If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 15 business days to respond from the date the letter was re-sent. If the family fails to respond within this time frame, the family will be removed from the waiting list without further notice.

The family may request to be reinstated to the waitlist within one year of the withdraw date. The family may request an informal review resulting from removal of the waitlist.

Removal from the Waiting List

SFHA Policy

The PHA will remove applicants from the waiting list if they have requested, in writing, that their name be removed. In such cases no informal hearing is required.

If the PHA determines that the family is not eligible for admission (see Chapter 3) at any time while the family is on the waiting list the family will be removed from the waiting list.

If a family is removed from the waiting list because the PHA has determined the family is not eligible for admission, a notice will be sent to the family's address of record as well as to any alternate address provided on the initial application. The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal hearing regarding the PHA's decision (see Chapter 14) [24 CFR 960.208(a)].

PART III: TENANT SELECTION

4-III.A. OVERVIEW

The PHA must establish tenant selection policies for families being admitted to public housing [24 CFR 960.201(a)]. The PHA must not require any specific income or racial quotas for any developments [24 CFR 903.2(d)]. The PHA must not assign persons to a particular section of a community or to a development or building based on race, color, religion, sex, disability, familial status or national origin for purposes of segregating populations [24 CFR 1.4(b)(1)(iii) and 24 CFR 903.2(d)(1)].

The order in which families will be selected from the waiting list depends on the selection method chosen by the PHA and is impacted in part by any selection preferences that the family qualifies for. The availability of units also may affect the order in which families are selected from the waiting list.

The PHA must maintain a clear record of all information required to verify that the family is selected from the waiting list according to the PHA's selection policies [24 CFR 960.206(e)(2)]. The PHA's policies must be posted any place where the PHA receives applications. The PHA must provide a copy of its tenant selection policies upon request to any applicant or tenant. The PHA may charge the family for providing a copy of its tenant selection policies [24 CFR 960.202(c)(2)].

SFHA Policy

When an applicant or resident family requests a copy of the PHA's tenant selection policies, the PHA will provide copies to them free of charge.

4-III.B. SELECTION METHOD

PHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the PHA will use. A preference does not guarantee admission to the program. Preferences are used to establish the order of placement on the waiting list. Every applicant must meet the SFHA's selection criteria as defined in this policy.

Local Preferences [24 CFR 960.206]

PHAs are permitted to establish local preferences and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources. Applicants must provide verification of the preference at the time they are called in for their initial intake. [24 CFR 960.206(a)].

SFHA Policy

The SFHA adopted the following local preferences during the Annual Plan Process in 2012. All preferences must be verified at the time of intake. If an applicant is unable to provide verification at the time of intake, the applicant will be placed back on the waitlist according to the date and time of application.

- **Absolute Preference(s)**
 - Veteran /Surviving Spouse of Veteran
- **Involuntary Displacement from residence in San Francisco (5 points)**
- **Homeless Family in San Francisco (5 points)**
- **Homeless Senior or Person with Disability in San Francisco (5 points)**
- **Resident in San Francisco Paying more than 70% of household income in rent (1 point)**

Absolute Preference

Veteran/Surviving Spouse of Veteran

California Health and Safety Code section 34322.2(b) states that “[p]riority shall be given with each preference category to families of veterans and servicemen.” A veteran is someone who is recognized by a local, state or federal government agency as a veteran, and he or she receives or qualifies for veteran’s benefits. Therefore, veterans and families of veterans shall receive preference within each of SFHA’s preference categories.

Preferences

The following preferences are mutually exclusive. An applicant family is limited to selecting one of the following:

Involuntary Displacement from residence in San Francisco (5 points)

An applicant is or will be involuntarily displaced if the applicant has vacated or will have to vacate his or her housing unit as a result of one or more of the following actions:

- *Natural Disaster*: A disaster such as a fire, flood or earthquake that resulted in the inhabitability of the applicant’s unit.
- *Domestic Violence*: An applicant who has vacated due to actual or threatened physical violence directed against the applicant or one or more members of the applicant’s family by a spouse or other household member, who lives in housing with an individual who engages in such violence.
- *Victim of Hate Crime/Violent Crime*: Actual or threatened physical violence or intimidation directed against an applicant and his/her property that is based on the person’s race, color, creed, religion, national origin, ancestry, age, height, weight, sex, sexual orientation, gender identity, domestic partner status, marital status, disability or Acquired Immune Deficiency Syndrome or HIV status (AIDS/HIV status), or association with members of such protected classes, that is documented by law enforcement agency stating that the applicant is in an immediate life-threatening situation and that an immediate transfer would minimize the problem.
- *Government Action*: an action of a government agency related to code enforcement or public improvement or development.
- *Landlord Action*: an action by a housing owner that results in an applicant’s having to vacate his or her unit, where the reason for the owner’s action was beyond the applicant’s ability to control or prevent, and despite the applicant having met all previously imposed conditions of occupancy, and the action is other than a rent increase.

Homeless Family in San Francisco (5 points)

An applicant family qualifies for this preference when the family:

- Individuals in any family shelter, or on the centralized waiting list for families operated by Compass Connecting Point
- Families with minor children in a Domestic Violence shelter
- Families living in a transitional housing residence
- Families with minor children in a Single Room Occupancy (SRO) unit

Homeless Senior or Person with Disability in San Francisco (5 points)

An applicant senior or person with disability qualifies for this preference when the applicant:

- Lacks a fixed regular, and adequate nighttime residence; and/or
- Has a primary residence that is:
 - A supervised publicly or privately operated shelter or transitional housing residence designed to provide temporary living accommodations; or
 - An institution that provides a residence for an individual; or
 - A public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
 - Not accessible

Resident in San Francisco paying more than 70% of household income in rent (1 point)

An applicant shall qualify for this local preference if the family is paying more than 70 percent of the total family income for rent. However, an applicant may not qualify for a preference under this section if the applicant is paying more than 70 percent of family income to rent a unit because his or her housing assistance under the public housing, Housing Choice Voucher program, or any program under the Housing and Urban Development Act of 1965 with respect to that unit has been terminated as a result of the applicant's refusal to comply with applicable program policies and procedures with respect to the occupancy of under-occupied and overcrowded units.

Prohibition of Preference if Applicant was evicted for drug-related and/or criminal activity

The SFHA will not give any preference to an applicant if any member of the family is a person who was evicted within the three years prior to applying because of drug-related criminal activity from any assisted housing program. The SFHA may consider granting a preference in any of the following cases:

- If the SFHA determines that the evicted person has successfully completed a rehabilitation program approved by the SFHA; or
- If the SFHA determines that the evicted person clearly did not participate in or knew about the drug related criminal activity; or
- If the SFHA determines that the evicted person no longer participates in any drug-related criminal activity

The SFHA's preference system will work in combination with requirements to match the characteristics for the family to the type of unit available, including units with targeted

populations, and further deconcentration of poverty in Public Housing. When such matching is required or permitted by current law, the SFHA will give preference to qualified families.

Families who reach the top of the waiting list will be contacted by the SFHA to verify their preference and, if verified, the SFHA will require that the family complete a full application for occupancy. Applicants must complete the application for occupancy and continue through the application processing and may not retain their place on the waiting list if they refuse to complete the processing when contacted by the SFHA.

Among applicants with equal preference status, the waiting list will be organized by date and time of the application.

An applicant will not be granted any preference if any member of the family has been evicted from any federally assisted housing during the past five years because of drug-related criminal activity.

The SFHA may grant an exception to such a family if:

- The responsible member has successfully completed a rehabilitation program;

- The evicted person was not involved in the drug related or violent criminal activity;

- The evicted person is no longer involved in any drug related criminal activity.

If an applicant makes a false statement in order to qualify for a Local Ranking preference, the SFHA will deny the preference.

Preferences assigned will be based on the pre-application submitted by the family. All preferences claimed will be verified.

The qualification for preference must exist at the time the preference is verified regardless of the length of time an applicant has been on the waiting list. Preferences are based on current status.

Income Targeting Requirement [24 CFR 960.202(b)]

HUD requires that extremely low-income (ELI) families make up at least 40% of the families admitted to public housing during the PHA's fiscal year. ELI families are those with annual incomes at or below 30% of the area median income. To ensure this requirement is met, the PHA may skip non-ELI families on the waiting list in order to select an ELI family.

If a PHA also operates a housing choice voucher (HCV) program, admissions of extremely low-income families to the PHA's HCV program during a PHA fiscal year that exceed the 75% minimum target requirement for the voucher program, shall be credited against the PHA's basic targeting requirement in the public housing program for the same fiscal year. However, under these circumstances the fiscal year credit to the public housing program must not exceed the lower of: (1) ten percent of public housing waiting list admissions during the PHA fiscal year; (2) ten percent of waiting list admissions to the PHA's housing choice voucher program during the PHA fiscal year; or (3) the number of qualifying low-income families who commence occupancy during the fiscal year of PHA public housing units located in census tracts with a poverty rate of 30 percent or more. For this purpose, qualifying low-income family means a low-income family other than an extremely low-income family.

SFHA Policy

The PHA will monitor progress in meeting the ELI requirement throughout the fiscal year. ELI families will be selected ahead of other eligible families on an as-needed basis to ensure that the income targeting requirement is met.

Mixed Population Developments [24 CFR 960.407]

A mixed population development is a public housing development or portion of a development that was reserved for elderly families and disabled families at its inception (and has retained that character) or the PHA at some point after its inception obtained HUD approval to give preference in tenant selection for all units in the development (or portion of a development) to elderly and disabled families [24 CFR 960.102]. Elderly family means a family whose head, spouse, co-head, or sole member is a person who is at least 62 years of age. Disabled family means a family whose head, spouse, co-head, or sole member is a person with disabilities [24 CFR 5.403]. The PHA must give elderly and disabled families equal preference in selecting these families for admission to mixed population developments. The PHA may not establish a limit on the number of elderly or disabled families that may occupy a mixed population development. In selecting elderly and disabled families to fill these units, the PHA must first offer the units that have accessibility features for families that include a person with a disability and require the accessibility features of such units. The PHA may not discriminate against elderly or disabled families that include children (Fair Housing Amendments Act of 1988).

Units Designated for Elderly or Disabled Families [24 CFR 945]

The PHA may designate projects or portions of a public housing project specifically for elderly or disabled families. The PHA must have a HUD-approved allocation plan before the designation may take place.

Among the designated developments, the PHA must also apply any preferences that it has established. If there are not enough elderly families to occupy the units in a designated elderly development, the PHA may allow near-elderly families to occupy the units [24 CFR 945.303(c)(1)]. Near-elderly family means a family whose head, spouse, or co-head is at least 50 years old, but is less than 62 [24 CFR 5.403].

If there are an insufficient number of elderly families and near-elderly families for the units in a development designated for elderly families, the PHA must make available to all other families any unit that is ready for re-rental and has been vacant for more than 60 consecutive days [24 CFR 945.303(c)(2)].

The decision of any disabled family or elderly family not to occupy or accept occupancy in designated housing shall not have an adverse effect on their admission or continued occupancy in public housing or their position on or placement on the waiting list. However, this protection does not apply to any family who refuses to occupy or accept occupancy in designated housing because of the race, color, religion, sex, disability, familial status, or national origin of the occupants of the designated housing or the surrounding area [24 CFR 945.303(d)(1) and (2)].

This protection does apply to an elderly family or disabled family that declines to accept occupancy, respectively, in a designated project for elderly families or for disabled families, and requests occupancy in a general occupancy project or in a mixed population project [24 CFR 945.303(d)(3)].

SFHA Policy

The PHA does not have designated elderly or designated disabled housing at this time.

Deconcentration of Poverty and Income-Mixing [24 CFR 903.1 and 903.2]

The PHA's admission policy must be designed to provide for deconcentration of poverty and income-mixing by bringing higher income tenants into lower income projects and lower income tenants into higher income projects. A statement of the PHA's deconcentration policies must be included in its annual plan [24 CFR 903.7(b)].

The PHA's deconcentration policy must comply with its obligation to meet the income targeting requirement [24 CFR 903.2(c)(5)].

Developments subject to the deconcentration requirement are referred to as 'covered developments' and include general occupancy (family) public housing developments. The following developments are not subject to deconcentration and income mixing requirements: developments operated by a PHA with fewer than 100 public housing units; mixed population or developments designated specifically for elderly or disabled families; developments operated by a PHA with only one general occupancy development; developments approved for demolition or for conversion to tenant-based public housing; and developments approved for a mixed-finance plan using HOPE VI or public housing funds [24 CFR 903.2(b)].

Steps for Implementation [24 CFR 903.2(c)(1)]

To implement the statutory requirement to deconcentrate poverty and provide for income mixing in covered developments, the PHA must comply with the following steps:

Step 1. The PHA must determine the average income of all families residing in all the PHA's covered developments. The PHA may use the median income, instead of average income, provided that the PHA includes a written explanation in its annual plan justifying the use of median income.

SFHA Policy

The PHA will determine the average income of all families in all covered developments on an annual basis.

Step 2. The PHA must determine the average income (or median income, if median income was used in Step 1) of all families residing in each covered development. In determining average income for each development, the PHA has the option of adjusting its income analysis for unit size in accordance with procedures prescribed by HUD.

SFHA Policy

The PHA will determine the average income of all families residing in each covered development (not adjusting for unit size) on an annual basis.

Step 3. The PHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85% to 115% of the average family income determined in Step 1. However, the upper limit must never be less than the income at which a family would be defined as an extremely low income family (30% of median income).

Step 4. The PHA with covered developments having average incomes outside the EIR must then determine whether or not these developments are consistent with its local goals and annual plan.

Step 5. Where the income profile for a covered development is not explained or justified in the annual plan submission, the PHA must include in its admission policy its specific policy to provide for deconcentration of poverty and income mixing.

Depending on local circumstances the PHA's deconcentration policy may include, but is not limited to the following:

- Providing incentives to encourage families to accept units in developments where their income level is needed, including rent incentives, affirmative marketing plans, or added amenities
- Targeting investment and capital improvements toward developments with an average income below the EIR to encourage families with incomes above the EIR to accept units in those developments
- Establishing a preference for admission of working families in developments below the EIR
- Skipping a family on the waiting list to reach another family in an effort to further the goals of deconcentration
- Providing other strategies permitted by statute and determined by the PHA in consultation with the residents and the community through the annual plan process to be responsive to local needs and PHA strategic objectives

A family has the sole discretion whether to accept an offer of a unit made under the PHA's deconcentration policy. The PHA must not take any adverse action toward any eligible family for choosing not to accept an offer of a unit under the PHA's deconcentration policy [24 CFR 903.2(c)(4)].

If, at annual review, the average incomes at all general occupancy developments are within the EIR, the PHA will be considered to be in compliance with the deconcentration requirement and no further action is required.

Order of Selection [24 CFR 960.206(e)]

The PHA system of preferences may select families either according to the date and time of application or by a random selection process.

SFHA Policy

Families will be selected from the waiting list based on preference(s). Among applicants with the same preference, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the PHA.

When selecting applicants from the waiting list the PHA will match the characteristics of the available unit (unit size, accessibility features, unit type) to the applicants on the waiting lists. The PHA will offer the unit to the highest ranking applicant who qualifies for that unit size or type, or that requires the accessibility features.

By matching unit and family characteristics, it is possible that families who are lower on the waiting list may receive an offer of housing ahead of families with an earlier date and time of application or higher preference status.

Factors such as deconcentration or income mixing and income targeting will also be considered in accordance with HUD requirements and PHA policy.

4-III.C. NOTIFICATION OF SELECTION

When the family has been selected from the waiting list, the PHA must notify the family.

SFHA Policy

The PHA will notify the family by first class mail when it is selected from the waiting list.

The notice will inform the family of the following:

Date, time, and location of the scheduled application interview, including any procedures for rescheduling the interview

Who is required to attend the interview

Documents that must be provided at the interview to document the legal identity of household members, including information about what constitutes acceptable documentation

Documents that must be provided at the interview to document eligibility for a preference, if applicable

Other documents and information that should be brought to the interview

If a notification letter is returned to the PHA with no forwarding address, the family will be removed from the waiting list without further notice. Such failure to act on the part of the applicant prevents the PHA from making an eligibility determination.

The family may request to be reinstated to the waitlist within one year of the withdraw date. The family may request an informal review resulting from removal of the waitlist.

4-III.D. THE APPLICATION INTERVIEW

HUD recommends that the PHA obtain the information and documentation needed to make an eligibility determination through a private interview. Being invited to attend an interview does not constitute admission to the program.

Assistance cannot be provided to the family until all SSN documentation requirements are met. However, if the PHA determines that an applicant family is otherwise eligible to participate in the program, the family may retain its place on the waiting list for a period of time determined by the PHA [Notice PIH 2012-10].

Reasonable accommodation must be made for persons with disabilities who are unable to attend an interview due to their disability [24 CFR 8.4(a) and 24 CFR 100.204(a)].

SFHA Policy

Families selected from the waiting list are required to participate in an eligibility interview.

The head of household and the spouse/co-head will be strongly encouraged to attend the interview together. However, either the head of household or the spouse/co-head shall attend the interview on behalf of the family. Verification of adult members of the family will not commence until all release forms are submitted to the PHA. The interview will be conducted only if the head of household or spouse/co-head provides appropriate documentation of legal identity (Chapter 7 provides a discussion of proper documentation of legal identity). If the family representative does not provide the required documentation, the appointment may be rescheduled when the proper documents have been obtained.

Pending disclosure and documentation of social security numbers, the PHA will allow the family to retain its place on the waiting list for ninety (90) days. If not all household members have disclosed their SSNs at the next time a unit becomes available, the PHA will offer a unit to the next eligible applicant family on the waiting list.

If the family is claiming a waiting list preference, the family must provide documentation to verify their eligibility for a preference (see Chapter 7). If the family is verified as eligible for the preference, the PHA will proceed with the interview. If the PHA determines the family is not eligible for the preference, the interview will not proceed and the family will be placed back on the waiting list according to the date and time of their application.

The family must provide the information necessary to establish the family's eligibility, including suitability, and to determine the appropriate amount of rent the family will pay. The family must also complete required forms, provide required signatures, and submit required documentation. If any materials are missing, the PHA will provide the family with a written list of items that must be submitted.

Any required documents or information that the family is unable to provide at the interview must be provided within 10 business days of the interview (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of Social Security numbers and eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (see Chapter 3).

An advocate, interpreter, or other assistant may assist the family with the application and the interview process.

Interviews will be conducted in English. For Limited English Proficient (LEP) applicants, the PHA will provide translation services in accordance with the PHA's LEP plan.

If the family is unable to attend a scheduled interview, the family should contact the PHA at least 24 hours in advance of the interview to schedule a new appointment. In all circumstances, if a family does not attend a scheduled interview, the PHA will send another notification letter with a new interview appointment time. Applicants who fail to attend two scheduled interviews without PHA approval will have their applications made inactive based on the family's failure to supply information needed to determine eligibility. The second appointment letter will state that failure to appear for the appointment without a request to reschedule will be interpreted to mean that the family is no longer interested and their application will be made inactive. Such failure to act on the part of the applicant prevents the PHA from making an eligibility determination, therefore the PHA will not offer an informal hearing.

4-III.E. FINAL ELIGIBILITY DETERMINATION [24 CFR 960.208]

The PHA must verify all information provided by the family (see Chapter 7). Based on verified information related to the eligibility requirements, including PHA suitability standards, the PHA must make a final determination of eligibility (see Chapter 3).

When a determination is made that a family is eligible and satisfies all requirements for admission, including tenant selection criteria, the applicant must be notified of the approximate date of occupancy insofar as that date can be reasonably determined [24 CFR 960.208(b)].

SFHA Policy

The PHA will notify a family in writing of their eligibility within 30 calendar days.

The PHA must promptly notify any family determined to be ineligible for admission of the basis for such determination, and must provide the applicant upon request, within a reasonable time after the determination is made, with an opportunity for an informal hearing on such determination [24 CFR 960.208(a)].

SFHA Policy

If the PHA determines that the family is ineligible, the PHA will send written notification of the ineligibility determination within 30 calendar days of the determination. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal hearing (see Chapter 14).

If the PHA uses a criminal record or sex offender registration information obtained under 24 CFR 5, Subpart J, as the basis of a denial, a copy of the record must precede the notice to deny, with an opportunity for the applicant to dispute the accuracy and relevance of the information before the PHA can move to deny the application. See Section 3-III.G for the PHA's policy regarding such circumstances.

Chapter 5

OCCUPANCY STANDARDS AND UNIT OFFERS

INTRODUCTION

The PHA must establish policies governing occupancy of dwelling units and offering dwelling units to qualified families.

This chapter contains policies for assigning unit size and making unit offers. The PHA's waiting list and selection policies are contained in Chapter 4. Together, Chapters 4 and 5 of the ACOP comprise the PHA's Tenant Selection and Assignment Plan (TSAP).

Policies in this chapter are organized in two parts.

Part I: Occupancy Standards. This part contains the PHA's standards for determining the appropriate unit size for families of different sizes and types.

Part II: Unit Offers. This part contains the PHA's policies for making unit offers, and describes actions to be taken when unit offers are refused.

PART I: OCCUPANCY STANDARDS

5-I.A. OVERVIEW

Occupancy standards are established by the PHA to ensure that units are occupied by families of the appropriate size. This policy maintains the maximum usefulness of the units, while preserving them from excessive wear and tear or underutilization. Part I of this chapter explains the occupancy standards. These standards describe the methodology and factors the PHA will use to determine the size unit for which a family qualifies, and includes the identification of the minimum and maximum number of household members for each unit size. This part also identifies circumstances under which an exception to the occupancy standards may be approved.

5-I.B. DETERMINING UNIT SIZE

In selecting a family to occupy a particular unit, the PHA may match characteristics of the family with the type of unit available, for example, number of bedrooms [24 CFR 960.206(c)].

HUD does not specify the number of persons who may live in public housing units of various sizes. PHAs are permitted to develop appropriate occupancy standards as long as the standards do not have the effect of discriminating against families with children [PH Occ GB, p. 62].

Although the PHA does determine the size of unit the family qualifies for under the occupancy standards, the PHA does not determine who shares a bedroom/sleeping room.

The PHA's occupancy standards for determining unit size must be applied in a manner consistent with fair housing requirements.

SFHA Policy

The PHA will use the same occupancy standards for each of its developments.

The PHA's occupancy standards are as follows:

The PHA will assign one bedroom for each two persons within the household, except in the following circumstances:

Persons of different generations will not be required to share a bedroom.

Live-in aides will be allocated a separate bedroom. No additional bedrooms will be provided for the live-in aide's family.

Single person families will be allocated a zero or one bedroom.

Foster children will be included in determining unit size.

The PHA will reference the following standards in determining the appropriate unit bedroom size for a family:

BEDROOM SIZE	MINIMUM NUMBER OF PERSONS	MAXIMUM NUMBER OF PERSONS
0	1	2
1	1	4
2	2	6
3	3	8
4	4-6	10
5	6-8	12
6	8-10	14

5-I.C. EXCEPTIONS TO OCCUPANCY STANDARDS

Types of Exceptions

SFHA Policy

The PHA will consider granting exceptions to the occupancy standards at the family's request if the PHA determines the exception is justified by the relationship, age, sex, health or disability of family members, or other personal circumstances.

For example, an exception may be granted if a larger bedroom size is needed for medical equipment due to its size and/or function, or as a reasonable accommodation for a person with disabilities. An exception may also be granted for a smaller bedroom size in cases where the number of household members exceeds the maximum number of persons allowed for the unit size in which the family resides (according to the chart in Section 5-I.B) and the family does not want to transfer to a larger size unit.

When evaluating exception requests the PHA will consider the size and configuration of the unit. In no case will the PHA grant an exception that is in violation of local housing or occupancy codes, regulations or laws.

Requests from applicants to be placed on the waiting list for a unit size smaller than designated by the occupancy standards will be approved as long as the unit is not overcrowded according to local code, and the family agrees not to request a transfer for a period of two years from the date of admission, unless they have a subsequent change in family size or composition.

Processing of Exceptions

SFHA Policy

All requests for exceptions to the occupancy standards must be submitted in writing.

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

Requests for a larger size unit must explain the need or justification for the larger size unit, and must include appropriate documentation. Requests based on health-related reasons must be verified by a knowledgeable professional source, unless the disability and the disability-related request for accommodation is readily apparent or otherwise known.

The PHA will notify the family of its decision within 30 calendar days of receiving the family's request.

PART II: UNIT OFFERS

24 CFR 1.4(b)(2)(ii); 24 CFR 960.208

5-II.A. OVERVIEW

The PHA must assign eligible applicants to dwelling units in accordance with a plan that is consistent with civil rights and nondiscrimination.

In filling an actual or expected vacancy, the PHA must offer the dwelling unit to an applicant in the appropriate sequence. The PHA will offer the unit until it is accepted. This section describes the PHA's policies with regard to the number of unit offers that will be made to applicants selected from the waiting list. This section also describes the PHA's policies for offering units with accessibility features.

SFHA Policy

The PHA will maintain a record of units offered, including location, date and circumstances of each offer, each acceptance or rejection, including the reason for the rejection.

5-II.B. NUMBER OF OFFERS

SFHA Policy

After accepting the offer of housing, the applicant will be shown a vacant unit in their referred location. Units and applicants are matched based on the size and type of housing required by an applicant, taking into account priorities for accessibility and allocation plans. The applicant will be offered a suitable unit in that location. If the offer is rejected, the applicant will be offered the next suitable unit that becomes available, whether it is at the same location as the first offer or at another location. **The second unit offer will be the final offer, unless there is good cause for refusing the offer.**

If more than one unit of the appropriate type and size is available, the first unit to be offered will be the first unit that is ready for occupancy.

The Eligibility Department will withdraw the application after the applicant declines the offer of housing (without "good cause"). The applicant will have the option to re-apply when the waitlist is open.

5-II.C. TIME LIMIT FOR UNIT OFFER ACCEPTANCE OR REFUSAL

SFHA Policy

Applicants must accept or refuse a unit offer within 5 business days of the date of the unit offer

Offers made by telephone will be confirmed by letter

5-II.D. REFUSALS OF UNIT OFFERS

Good Cause for Unit Refusal

An elderly or disabled family may decline an offer for designated housing. Such a refusal must not adversely affect the family's position on or placement on the public housing waiting list [24 CFR 945.303(d)].

SFHA Policy

Applicants may refuse to accept a unit offer for "*good cause.*" *Good cause* includes situations in which an applicant is willing to move but is unable to do so at the time of the unit offer, or the applicant demonstrates that acceptance of the offer would cause undue hardship not related to considerations of the applicant's race, color, national origin, etc. [PH Occ GB, p. 104]. Examples of good cause for refusal of a unit offer include, but are not limited to, the following:

Inaccessibility to source of employment, education, or job training, children's day care, or educational program for children with disabilities, so that accepting the unit offer would require the adult household member to quit a job, drop out of an educational institution or job training program, or take a child out of day care or an educational program for children with disabilities

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

A health professional verifies temporary hospitalization or recovery from illness of the principal household member, other household members (as listed on final application) or live-in aide necessary to the care of the principal household member

The unit is inappropriate for the applicant's disabilities, or the family does not need the accessible features in the unit offered and does not want to be subject to a 30-day notice to move

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

In the case of a unit refusal for good cause the applicant will not be removed from the waiting list as described later in this section. The applicant will remain at the top of the waiting list until the family receives an offer for which they do not have good cause to refuse.

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

Unit Refusal Without Good Cause

SFHA Policy

When an applicant rejects the final unit offer without good cause, the PHA will remove the applicant's name from the waiting list and send notice to the family of such removal. The notice will inform the family of their right to request an informal hearing and the process for doing so (see Chapter 14).

The applicant may reapply for assistance if the waiting list is open. If the waiting list is not open, the applicant must wait to reapply until the PHA opens the waiting list.

5-II.E. ACCESSIBLE UNITS [24 CFR 8.27]

PHAs must adopt suitable means to assure that information regarding the availability of accessible units reaches eligible individuals with disabilities, and take reasonable nondiscriminatory steps to maximize the utilization of such units by eligible individuals whose disability requires the accessibility features of a particular unit.

When an accessible unit becomes vacant, before offering such units to a non-disabled applicant the PHA must offer such units:

- First, to a current resident of another unit of the same development, or other public housing development under the PHA's control, who has a disability that requires the special features of the vacant unit and is occupying a unit not having such features, or if no such occupant exists, then
- Second, to an eligible qualified applicant on the waiting list having a disability that requires the special features of the vacant unit.

When offering an accessible unit to an applicant not having a disability requiring the accessibility features of the unit, the PHA may require the applicant to agree (and may incorporate this agreement in the lease) to move to a non-accessible unit when available.

SFHA Policy

Families requiring an accessible unit may be over-housed in such a unit if there are no resident or applicant families of the appropriate size who also require the accessible features of the unit.

When there are no resident or applicant families requiring the accessible features of the unit, including families who would be over-housed, the PHA will offer the unit to a non-disabled applicant.

When offering an accessible unit to a non-disabled applicant, the PHA will require the applicant to agree to move to an available non-accessible unit within 30 days when either a current resident or an applicant needs the features of the unit and there is another unit available for the non-disabled family. This requirement will be a provision of the lease agreement.

Chapter 6

INCOME AND RENT DETERMINATIONS

[24 CFR Part 5, Subparts E and F; 24 CFR 960, Subpart C]

INTRODUCTION

A family's income determines eligibility for assistance and is also used to calculate the family's rent payment. The PHA will use the policies and methods described in this chapter to ensure that only eligible families receive assistance and that no family pays more or less than its obligation under the regulations. This chapter describes HUD regulations and PHA policies related to these topics in three parts as follows:

Part I: Annual Income. HUD regulations specify the sources of income to include and exclude to arrive at a family's annual income. These requirements and PHA policies for calculating annual income are found in Part I.

Part II: Adjusted Income. Once annual income has been established HUD regulations require the PHA to subtract from annual income any of five mandatory deductions for which a family qualifies. These requirements and PHA policies for calculating adjusted income are found in Part II.

Part III: Calculating Rent. This part describes the statutory formula for calculating total tenant payment (TTP), the use of utility allowances, and the methodology for determining family rent payment. Also included here are flat rents and the family's choice in rents.

PART I: ANNUAL INCOME

6-I.A. OVERVIEW

The general regulatory definition of *annual income* shown below is from 24 CFR 5.609.

5.609 Annual income.

(a) Annual income means all amounts, monetary or not, which:

(1) Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or

(2) Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and

(3) Which are not specifically excluded in paragraph [5.609(c)].

(4) Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

In addition to this general definition, HUD regulations establish policies for treating specific types of income and assets. The full texts of those portions of the regulations are provided in exhibits at the end of this chapter as follows:

- Annual Income Inclusions (Exhibit 6-1)
- Annual Income Exclusions (Exhibit 6-2)
- Treatment of Family Assets (Exhibit 6-3)
- Earned Income Disallowance (Exhibit 6-4)
- The Effect of Welfare Benefit Reduction (Exhibit 6-5)

Sections 6-I.B and 6-I.C discuss general requirements and methods for calculating annual income. The rest of this section describes how each source of income is treated for the purposes of determining annual income. HUD regulations present income inclusions and exclusions separately [24 CFR 5.609(b) and 24 CFR 5.609(c)]. In this ACOP, however, the discussions of income inclusions and exclusions are integrated by topic (e.g., all policies affecting earned income are discussed together in section 6-I.D). Verification requirements for annual income are discussed in Chapter 7.

6-I.B. HOUSEHOLD COMPOSITION AND INCOME

Income received by all family members must be counted unless specifically excluded by the regulations. It is the responsibility of the head of household to report changes in family composition. The rules on which sources of income are counted vary somewhat by family member. The chart below summarizes how family composition affects income determinations.

Summary of Income Included and Excluded by Person	
Live-in aides	Income from all sources is excluded [24 CFR 5.609(c)(5)].
Foster child or foster adult	Income from all sources is excluded [24 CFR 5.609(a)(1)].
Head, spouse, or co-head Other adult family members	All sources of income not specifically excluded by the regulations are included.
Children under 18 years of age	Employment income is excluded [24 CFR 5.609(c)(1)]. All other sources of income, except those specifically excluded by the regulations, are included.
Full-time students 18 years of age or older (not head, spouse, or co-head)	Employment income above \$480/year is excluded [24 CFR 5.609(c)(11)]. All other sources of income, except those specifically excluded by the regulations, are included.

Temporarily Absent Family Members

The income of family members approved to live in the unit will be counted, even if the family member is temporarily absent from the unit [HCV GB, p. 5-18].

SFHA Policy

Generally an individual who is or is expected to be absent from the assisted unit for 180 consecutive days or less is considered temporarily absent and continues to be considered a family member. Generally an individual who is or is expected to be absent from the assisted unit for more than 180 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.

Absent Students

SFHA Policy

When someone who has been considered a family member attends school away from home, the person will continue to be considered a family member unless information

becomes available to the PHA indicating that the student has established a separate household or the family declares that the student has established a separate household.

Absences Due to Placement in Foster Care

Children temporarily absent from the home as a result of placement in foster care are considered members of the family [24 CFR 5.403].

SFHA Policy

If a child has been placed in foster care, the PHA will verify with the appropriate agency whether and when the child is expected to be returned to the home. Unless the agency confirms that the child has been permanently removed from the home, the child will be counted as a family member.

Absent Head, Spouse, or Co-head

SFHA Policy

An employed head, spouse, or co-head absent from the unit more than 180 consecutive days due to employment will continue to be considered a family member.

Individuals Confined for Medical Reasons

SFHA Policy

An individual confined to a nursing home or hospital on a permanent basis is not considered a family member.

If there is a question about the status of a family member, the PHA will request verification from a responsible medical professional and will use this determination. If the responsible medical professional cannot provide a determination, the person generally will be considered temporarily absent. The family may present evidence that the family member is confined on a permanent basis and request that the person not be considered a family member.

Joint Custody of Children

SFHA Policy

Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or resident family 51 percent or more of the time.

When more than one applicant or assisted family (regardless of program) are claiming the same dependents as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim the dependents. If there is a dispute about which family should claim them, the PHA will make the determination based on available documents such as court orders, or an IRS return showing which family has claimed the child for income tax purposes.

Caretakers for a Child

SFHA Policy

If neither a parent nor a designated guardian remains in a household receiving assistance, the PHA will take the following actions.

If a responsible agency has determined that another adult is to be brought into the unit to care for a child for an indefinite period, the designated caretaker will not be considered a family member until a determination of custody or legal guardianship is made.

If a caretaker has assumed responsibility for a child without the involvement of a responsible agency or formal assignment of custody or legal guardianship, the caretaker will be treated as a visitor for 90 days. After the 90 days has elapsed, the caretaker will be considered a family member unless information is provided that would confirm that the caretaker's role is temporary. In such cases the PHA will extend the caretaker's status as an eligible visitor.

At any time that custody or guardianship legally has been awarded to a caretaker, the lease will be transferred to the caretaker, as head of household.

During any period that a caretaker is considered a visitor, the income of the caretaker is not counted in annual income and the caretaker does not qualify the family for any deductions from income.

6-I.C. ANTICIPATING ANNUAL INCOME

The PHA is required to count all income “anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date” [24 CFR 5.609(a)(2)]. Policies related to anticipating annual income are provided below.

Basis of Annual Income Projection

The PHA generally will use current circumstances to determine anticipated income for the coming 12-month period. HUD authorizes the PHA to use other than current circumstances to anticipate income when:

- An imminent change in circumstances is expected [HCV GB, p. 5-17]
- It is not feasible to anticipate a level of income over a 12-month period (e.g., seasonal or cyclic income) [24 CFR 5.609(d)]
- The PHA believes that past income is the best available indicator of expected future income [24 CFR 5.609(d)]

PHAs are required to use HUD’s Enterprise Income Verification (EIV) system in its entirety as a third party source to verify employment and income information, and to reduce administrative subsidy payment errors in accordance with HUD administrative guidance [24 CFR 5.233(a)(2)].

HUD allows PHAs to use pay-stubs to project income once EIV data has been received in such cases where the family does not dispute the EIV employer data and where the PHA does not determine it is necessary to obtain additional third-party data.

SFHA Policy

When EIV is obtained and the family does not dispute the EIV employer data, the PHA will use current tenant-provided documents to project annual income. When the tenant-provided documents are pay stubs, the PHA will make every effort to obtain current and consecutive pay stubs dated within the last 60 days.

The PHA will obtain written and/or oral third-party verification in accordance with the verification requirements and policy in Chapter 7 in the following cases:

If EIV or other UIV data is not available,

If the family disputes the accuracy of the EIV employer data, and/or

If the PHA determines additional information is needed.

In such cases, the PHA will review and analyze current data to anticipate annual income. In all cases, the family file will be documented with a clear record of the reason for the decision, and a clear audit trail will be left as to how the PHA annualized projected income.

When the PHA cannot readily anticipate income based upon current circumstances (e.g., in the case of seasonal employment, unstable working hours, or suspected fraud), the

PHA will review and analyze historical data for patterns of employment, paid benefits, and receipt of other income and use the results of this analysis to establish annual income.

Any time current circumstances are not used to project annual income, a clear rationale for the decision will be documented in the file. In all such cases the family may present information and documentation to the PHA to show why the historic pattern does not represent the family's anticipated income.

Known Changes in Income

If the PHA verifies an upcoming increase or decrease in income, annual income will be calculated by applying each income amount to the appropriate part of the 12-month period.

Example: An employer reports that a full-time employee who has been receiving \$8/hour will begin to receive \$8.25/hour in the eighth week after the effective date of the reexamination. In such a case the PHA would calculate annual income as follows: $(\$8/\text{hour} \times 40 \text{ hours} \times 7 \text{ weeks}) + (\$8.25 \times 40 \text{ hours} \times 45 \text{ weeks})$.

The family may present information that demonstrates that implementing a change before its effective date would create a hardship for the family. In such cases the PHA will calculate annual income using current circumstances and then require an interim reexamination when the change actually occurs. This requirement will be imposed even if the PHA's policy on reexaminations does not require interim reexaminations for other types of changes.

When tenant-provided third-party documents are used to anticipate annual income, they will be dated within the last 60 days of the reexamination interview date.

EIV quarterly wages will not be used to project annual income at an annual or interim reexamination.

Projecting Income

In HUD's EIV webcast of January 2008, HUD made clear that PHAs are not to use EIV quarterly wages to project annual income.

6-I.D. EARNED INCOME

Types of Earned Income Included in Annual Income

Wages and Related Compensation [24 CFR 5.609(b)(1)]

The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services is included in annual income.

SFHA Policy

For persons who regularly receive bonuses or commissions, the PHA will verify and then average amounts received for the two years preceding admission or reexamination. If only a one-year history is available, the PHA will use the prior year amounts. In either case the family may provide, and the PHA will consider, a credible justification for not using this history to anticipate future bonuses or commissions. If a new employee has not yet received any bonuses or commissions, the PHA will count only the amount estimated by the employer. The file will be documented appropriately.

Some Types of Military Pay

All regular pay, special pay and allowances of a member of the Armed Forces are counted [24 CFR 5.609(b)(8)] except for the special pay to a family member serving in the Armed Forces who is exposed to hostile fire [24 CFR 5.609(c)(7)].

Types of Earned Income Not Counted in Annual Income

Temporary, Nonrecurring, or Sporadic Income [24 CFR 5.609(c)(9)]

This type of income (including gifts) is not included in annual income.

SFHA Policy

Sporadic income is income that is not received periodically and cannot be reliably predicted. For example, the income of an individual who works occasionally as a handyman would be considered sporadic if future work could not be anticipated and no historic, stable pattern of income existed.

Children's Earnings [24 CFR 5.609(c)(1)]

Employment income earned by children (including foster children) under the age of 18 years is not included in annual income. (See Eligibility chapter for a definition of *foster children*.)

Certain Earned Income of Full-Time Students

Earnings in excess of \$480 for each full-time student 18 years old or older (except for the head, spouse, or co-head) are not counted [24 CFR 5.609(c)(11)]. To be considered “full-time,” a student must be considered “full-time” by an educational institution with a degree or certificate program [HCV GB, p. 5-29].

Income of a Live-in Aide

Income earned by a live-in aide, as defined in [24 CFR 5.403], is not included in annual income [24 CFR 5.609(c)(5)]. (See Eligibility chapter for a full discussion of live-in aides.)

Income Earned under Certain Federal Programs [24 CFR 5.609(c)(17)]

Income from some federal programs is specifically excluded from consideration as income, including:

- Payments to volunteers under the Domestic Volunteer Services Act of 1973 (42 U.S.C. 5044(g), 5058)
- Payments received under programs funded in whole or in part under the Job Training Partnership Act (29 U.S.C. 1552(b))
- Awards under the federal work-study program (20 U.S.C. 1087 uu)
- Payments received from programs funded under Title V of the Older Americans Act of 1985 (42 U.S.C. 3056(f))
- Allowances, earnings, and payments to AmeriCorps participants under the National and Community Service Act of 1990 (42 U.S.C. 12637(d))
- Allowances, earnings, and payments to participants in programs funded under the Workforce Investment Act of 1998 (29 U.S.C. 2931)

Resident Service Stipend [24 CFR 5.600(c)(8)(iv)]

Amounts received under a resident service stipend are not included in annual income. A resident service stipend is a modest amount (not to exceed \$200 per individual per month) received by a resident for performing a service for the PHA, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA’s governing board. No resident may receive more than one such stipend during the same period of time.

State and Local Employment Training Programs

Incremental earnings and benefits to any family member resulting from participation in qualifying state or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff are excluded from annual income. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the training program [24 CFR 5.609(c)(8)(v)].

SFHA Policy

The PHA defines *training program* as “a learning process with goals and objectives, generally having a variety of components, and taking place in a series of sessions over a period of time. It is designed to lead to a higher level of proficiency, and it enhances the individual’s ability to obtain employment. It may have performance standards to measure proficiency. Training may include, but is not limited to: (1) classroom training in a specific occupational skill, (2) on-the-job training with wages subsidized by the program, or (3) basic education” [expired Notice PIH 98-2, p. 3].

The PHA defines *incremental earnings and benefits* as the difference between (1) the total amount of welfare assistance and earnings of a family member prior to enrollment in a training program and (2) the total amount of welfare assistance and earnings of the family member after enrollment in the program [expired Notice PIH 98-2, pp. 3–4].

In calculating the incremental difference, the PHA will use as the pre-enrollment income the total annualized amount of the family member’s welfare assistance and earnings reported on the family’s most recently completed HUD-50058.

End of participation in a training program must be reported in accordance with the PHA’s interim reporting requirements (see chapter on reexaminations).

HUD-Funded Training Programs

Amounts received under training programs funded in whole or in part by HUD [24 CFR 5.609(c)(8)(i)] are excluded from annual income. Eligible sources of funding for the training include operating subsidy, Housing Choice Voucher Program administrative fees, and modernization, Community Development Block Grant (CDBG), HOME program, and other grant funds received from HUD.

SFHA Policy

To qualify as a training program, the program must meet the definition of *training program* provided above for state and local employment training programs.

Earned Income Tax Credit. Earned income tax credit (EITC) refund payments received on or after January 1, 1991 (26 U.S.C. 32(j)), are excluded from annual income [24 CFR 5.609(c)(17)]. Although many families receive the EITC annually when they file taxes, an EITC can also be received throughout the year. The prorated share of the annual EITC is included in the employee's payroll check.

Earned Income Disallowance. The earned income disallowance is discussed in section 6-I.E below.

6-I.E. EARNED INCOME DISALLOWANCE [24 CFR 960.255]

The earned income disallowance (EID) encourages people to enter the work force by not including the full value of increases in earned income for a period of time. The full text of 24 CFR 960.255 is included as Exhibit 6-4 at the end of this chapter. Eligibility criteria and limitations on the disallowance are summarized below.

Eligibility

This disallowance applies only to individuals in families already participating in the public housing program (not at initial examination). To qualify, the family must experience an increase in annual income that is the result of one of the following events:

- Employment of a family member who was previously unemployed for one or more years prior to employment. *Previously unemployed* includes a person who annually has earned not more than the minimum wage applicable to the community multiplied by 500 hours. The applicable minimum wage is the federal minimum wage unless there is a higher state or local minimum wage.
- Increased earnings by a family member whose earnings increase during participation in an economic self-sufficiency or job-training program. A self-sufficiency program includes a program designed to encourage, assist, train, or facilitate the economic independence of HUD-assisted families or to provide work to such families [24 CFR 5.603(b)].
- New employment or increased earnings by a family member who has received benefits or services under Temporary Assistance for Needy Families (TANF) or any other state program funded under Part A of Title IV of the Social Security Act within the past six months. If the benefits are received in the form of monthly maintenance, there is no minimum amount. If the benefits or services are received in a form other than monthly maintenance, such as one-time payments, wage subsidies, or transportation assistance, the total amount received over the six-month period must be at least \$500.

Calculation of the Disallowance

Calculation of the earned income disallowance for an eligible member of a qualified family begins with a comparison of the member's current income with his or her "prior income."

SFHA Policy

The PHA defines *prior income*, or *prequalifying income*, as the family member's last certified income prior to qualifying for the EID.

The family member's prior, or prequalifying, income remains constant throughout the period that he or she is receiving the EID.

Initial 12-Month Exclusion

During the initial 12-month exclusion period, the full amount (100 percent) of any increase in income attributable to new employment or increased earnings is excluded. The 12 months are cumulative and need not be consecutive.

SFHA Policy

The initial EID exclusion period will begin on the first of the month following the date an eligible member of a qualified family is first employed or first experiences an increase in earnings.

Second 12-Month Exclusion and Phase-In

During the second 12-month exclusion period, the exclusion is reduced to half (50 percent) of any increase in income attributable to employment or increased earnings. The 12 months are cumulative and need not be consecutive.

Lifetime Limitation

The EID has a four-year (48-month) lifetime maximum. The four-year eligibility period begins at the same time that the initial exclusion period begins and ends 48 months later. The one-time eligibility for the EID applies even if the eligible individual begins to receive assistance from another housing agency, if the individual moves between public housing and the Housing Choice Voucher Program assistance, or if there are breaks in assistance.

SFHA Policy

During the 48-month eligibility period, the PHA will conduct an interim reexamination each time there is a change in the family member's annual income that affects or is affected by the EID (e.g., when the family member's income falls to a level at or below his/her prequalifying income, when one of the exclusion periods ends, and at the end of the lifetime maximum eligibility period).

Individual Savings Accounts [24 CFR 960.255(d)]

SFHA Policy

The PHA chooses not to establish a system of individual savings accounts (ISAs) for families who qualify for the EID.

The following rules pertaining to ISAs do not apply to this public housing program.

A qualified family paying income-based rent may choose an ISA instead of being given the EID. The PHA must advise the family that the ISA option is available. Families who choose the ISA will pay the higher rent and the PHA will deposit the difference between the higher rent and the EID rent in the savings account.

Amounts deposited to ISAs may only be withdrawn for the following reasons:

- Because the family is purchasing a home
- To pay education costs of family members
- Because the family is moving out of public or assisted housing
- To pay any other expenses the PHA authorizes to promote economic self-sufficiency

The PHA is required to maintain ISAs in interest bearing accounts, for which the family is credited with interest earned. The PHA may not charge the family a fee for maintaining the account.

At least once each year the PHA must provide the family with a statement of the balance in their account, including any interest earned, if required by state law.

SFHA Policy

When applicable, the PHA will provide the family with a statement of the balance in their account, including any interest earned, annually and upon request when the family makes withdrawals from the account.

If the family moves out of public housing, the PHA must return the balance in the family's ISA, less any amounts the family owes the PHA.

6-I.F. BUSINESS INCOME [24 CFR 5.609(b)(2)]

Annual income includes “the net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family” [24 CFR 5.609(b)(2)].

Business Expenses

Net income is “gross income less business expense” [HCV GB, p. 5-19].

SFHA Policy

To determine business expenses that may be deducted from gross income, the PHA will use current applicable Internal Revenue Service (IRS) rules for determining allowable business expenses [see IRS Publication 535], unless a topic is addressed by HUD regulations or guidance as described below.

Business Expansion

HUD regulations do not permit the PHA to deduct from gross income expenses for business expansion.

SFHA Policy

Business expansion is defined as any capital expenditures made to add new business activities, to expand current facilities, or to operate the business in additional locations. For example, purchase of a street sweeper by a construction business for the purpose of adding street cleaning to the services offered by the business would be considered a business expansion. Similarly, the purchase of a property by a hair care business to open at a second location would be considered a business expansion.

Capital Indebtedness

HUD regulations do not permit the PHA to deduct from gross income the amortization of capital indebtedness.

SFHA Policy

Capital indebtedness is defined as the principal portion of the payment on a capital asset such as land, buildings, and machinery. This means the PHA will allow as a business expense interest, but not principal, paid on capital indebtedness.

Negative Business Income

If the net income from a business is negative, no business income will be included in annual income; a negative amount will not be used to offset other family income.

Withdrawal of Cash or Assets from a Business

HUD regulations require the PHA to include in annual income the withdrawal of cash or assets from the operation of a business or profession unless the withdrawal reimburses a family member for cash or assets invested in the business by the family.

SFHA Policy

Acceptable investments in a business include cash loans and contributions of assets or equipment. For example, if a member of a tenant family provided an up-front loan of \$2,000 to help a business get started, the PHA will not count as income any withdrawals from the business up to the amount of this loan until the loan has been repaid. Investments do not include the value of labor contributed to the business without compensation.

Co-owned Businesses

SFHA Policy

If a business is co-owned with someone outside the family, the family must document the share of the business it owns. If the family's share of the income is lower than its share of ownership, the family must document the reasons for the difference.

6-I.G. ASSETS [24 CFR 5.609(b)(3) and 24 CFR 5.603(b)]

Overview

There is no asset limitation for participation in the public housing program. However, HUD requires that the PHA include in annual income the “interest, dividends, and other net income of any kind from real or personal property” [24 CFR 5.609(b)(3)]. This section discusses how the income from various types of assets is determined. For most types of assets, the PHA must determine the value of the asset in order to compute income from the asset. Therefore, for each asset type, this section discusses:

- How the value of the asset will be determined
- How income from the asset will be calculated

Exhibit 6-1 provides the regulatory requirements for calculating income from assets [24 CFR 5.609(b)(3)], and Exhibit 6-3 provides the regulatory definition of *net family assets*. This section begins with a discussion of general policies related to assets and then provides HUD rules and PHA policies related to each type of asset.

General Policies

Income from Assets

The PHA generally will use current circumstances to determine both the value of an asset and the anticipated income from the asset. As is true for all sources of income, HUD authorizes the PHA to use other than current circumstances to anticipate income when (1) an imminent change in circumstances is expected (2) it is not feasible to anticipate a level of income over 12 months or (3) the PHA believes that past income is the best indicator of anticipated income. For example, if a family member owns real property that typically receives rental income but the property is currently vacant, the PHA can take into consideration past rental income along with the prospects of obtaining a new tenant.

SFHA Policy

Any time current circumstances are not used to determine asset income, a clear rationale for the decision will be documented in the file. In such cases the family may present information and documentation to the PHA to show why the asset income determination does not represent the family’s anticipated asset income.

Valuing Assets

The calculation of asset income sometimes requires the PHA to make a distinction between an asset's market value and its cash value.

- The market value of an asset is its worth (e.g., the amount a buyer would pay for real estate or the balance in an investment account).
- The cash value of an asset is its market value less all reasonable amounts that would be incurred when converting the asset to cash.

SFHA Policy

Reasonable costs that would be incurred when disposing of an asset include, but are not limited to, penalties for premature withdrawal, broker and legal fees, and settlement costs incurred in real estate transactions [HCV GB, p. 5-28 and PH Occ GB, p. 121].

Lump-Sum Receipts

Payments that are received in a single lump sum, such as inheritances, capital gains, lottery winnings, insurance settlements, and proceeds from the sale of property, are generally considered assets, not income. However, such lump-sum receipts are counted as assets only if they are retained by a family in a form recognizable as an asset (e.g., deposited in a savings or checking account) [RHIIP FAQs]. (For a discussion of lump-sum payments that represent the delayed start of a periodic payment, most of which are counted as income, see sections 6-I.H and 6-I.I.)

Imputing Income from Assets [24 CFR 5.609(b)(3)]

When net family assets are \$5,000 or less, the PHA will include in annual income the actual income anticipated to be derived from the assets. When the family has net family assets in excess of \$5,000, the PHA will include in annual income the greater of (1) the actual income derived from the assets or (2) the imputed income. Imputed income from assets is calculated by multiplying the total cash value of all family assets by the current HUD-established passbook savings rate.

Determining Actual Anticipated Income from Assets

It may or may not be necessary for the PHA to use the value of an asset to compute the actual anticipated income from the asset. When the value is required to compute the anticipated income from an asset, the market value of the asset is used. For example, if the asset is a property for which a family receives rental income, the anticipated income is determined by annualizing the actual monthly rental amount received for the property; it is not based on the property's market value. However, if the asset is a savings account, the anticipated income is determined by multiplying the market value of the account by the interest rate on the account.

Withdrawal of Cash or Liquidation of Investments

Any withdrawal of cash or assets from an investment will be included in income except to the extent that the withdrawal reimburses amounts invested by the family. For example, when a family member retires, the amount received by the family from a retirement plan is not counted

as income until the family has received payments equal to the amount the family member deposited into the retirement fund.

Jointly Owned Assets

The regulation at 24 CFR 5.609(a)(4) specifies that annual income includes “amounts derived (during the 12-month period) from assets to which any member of the family has access.”

SFHA Policy

If an asset is owned by more than one person and any family member has unrestricted access to the asset, the PHA will count the full value of the asset. A family member has unrestricted access to an asset when he or she can legally dispose of the asset without the consent of any of the other owners.

If an asset is owned by more than one person, including a family member, but the family member does not have unrestricted access to the asset, the PHA will prorate the asset according to the percentage of ownership. If no percentage is specified or provided for by state or local law, the PHA will prorate the asset evenly among all owners.

Assets Disposed Of for Less than Fair Market Value [24 CFR 5.603(b)]

HUD regulations require the PHA to count as a current asset any business or family asset that was disposed of for less than fair market value during the two years prior to the effective date of the examination/reexamination, except as noted below.

Minimum Threshold

The PHA may set a threshold below which assets disposed of for less than fair market value will not be counted [HCV GB, p. 5-27].

SFHA Policy

The PHA will not include the value of assets disposed of for less than fair market value unless the cumulative fair market value of all assets disposed of during the past two years exceeds the gross amount received for the assets by more than \$1,000.

When the two-year period expires, the income assigned to the disposed asset(s) also expires. If the two-year period ends between annual re-certifications, the family may request an interim recertification to eliminate consideration of the asset(s).

Assets placed by the family in non-revocable trusts are considered assets disposed of for less than fair market value except when the assets placed in trust were received through settlements or judgments.

Separation or Divorce

The regulation also specifies that assets are not considered disposed of for less than fair market value if they are disposed of as part of a separation or divorce settlement and the applicant or tenant receives important consideration not measurable in dollar terms.

SFHA Policy

All assets disposed of as part of a separation or divorce settlement will be considered assets for which important consideration not measurable in monetary terms has been received. In order to qualify for this exemption, a family member must be subject to a formal separation or divorce settlement agreement established through arbitration, mediation, or court order.

Foreclosure or Bankruptcy

Assets are not considered disposed of for less than fair market value when the disposition is the result of a foreclosure or bankruptcy sale.

Family Declaration

SFHA Policy

Families must sign a declaration form at initial certification and each annual recertification identifying all assets that have been disposed of for less than fair market value or declaring that no assets have been disposed of for less than fair market value. The PHA may verify the value of the assets disposed of if other information available to the PHA does not appear to agree with the information reported by the family.

Types of Assets

Checking and Savings Accounts

For regular checking accounts and savings accounts, *cash value* has the same meaning as *market value*. If a checking account does not bear interest, the anticipated income from the account is zero.

SFHA Policy

In determining the value of a checking account, the PHA will use the average monthly balance for the last six months.

In determining the value of a savings account, the PHA will use the current balance.

In determining the anticipated income from an interest-bearing checking or savings account, the PHA will multiply the value of the account by the current rate of interest paid on the account.

Investment Accounts Such as Stocks, Bonds, Saving Certificates, and Money Market Funds

Interest or dividends earned by investment accounts are counted as actual income from assets even when the earnings are reinvested. The cash value of such an asset is determined by deducting from the market value any broker fees, penalties for early withdrawal, or other costs of converting the asset to cash.

SFHA Policy

In determining the market value of an investment account, the PHA will use the value of the account on the most recent investment report.

How anticipated income from an investment account will be calculated depends on whether the rate of return is known. For assets that are held in an investment account with a known rate of return (e.g., savings certificates), asset income will be calculated based on that known rate (market value multiplied by rate of earnings). When the anticipated rate of return is not known (e.g., stocks), the PHA will calculate asset income based on the earnings for the most recent reporting period.

Equity in Real Property or Other Capital Investments

Equity (cash value) in a property or other capital asset is the estimated current market value of the asset less the unpaid balance on all loans secured by the asset and reasonable costs (such as broker fees) that would be incurred in selling the asset [HCV GB, p. 5-25 and PH, p. 121].

SFHA Policy

In determining the equity, the SFHA will determine market value by examining recent sales of at least three properties in the surrounding or similar neighborhood that possess comparable factors that affect market value.

The SFHA will first use the payoff amount for the loan (mortgage) as the unpaid balance to calculate equity. If the payoff amount is not available, the SFHA will use the basic loan balance information to deduct from the market value in the equity calculation.

Equity in real property and other capital investments is considered in the calculation of asset income except for the following types of assets:

- Equity accounts in HUD homeownership programs [24 CFR 5.603(b)]
- Equity in real property when a family member's main occupation is real estate [HCV GB, p. 5-25]. This real estate is considered a business asset, and income related to this asset will be calculated as described in section 6-I.F.
- Interests in Indian Trust lands [24 CFR 5.603(b)]
- Real property and capital assets that are part of an active business or farming operation [HCV GB, p. 5-25]

The PHA must also deduct from the equity the reasonable costs for converting the asset to cash. Using the formula for calculating equity specified above, the net cash value of real property is

the market value of the loan (mortgage) minus the expenses to convert to cash [Notice PIH 2012-3].

SFHA Policy

For the purposes of calculating expenses to convert to cash for real property, the PHA will use ten percent of the market value of the home.

A family may have real property as an asset in two ways: (1) owning the property itself and (2) holding a mortgage or deed of trust on the property. In the case of a property owned by a family member, the anticipated asset income generally will be in the form of rent or other payment for the use of the property. If the property generates no income, actual anticipated income from the asset will be zero.

In the case of a mortgage or deed of trust held by a family member, the outstanding balance (unpaid principal) is the cash value of the asset. The interest portion only of payments made to the family in accordance with the terms of the mortgage or deed of trust is counted as anticipated asset income.

SFHA Policy

In the case of capital investments owned jointly with others not living in a family's unit, a prorated share of the property's cash value will be counted as an asset unless the PHA determines that the family receives no income from the property and is unable to sell or otherwise convert the asset to cash.

Trusts

A *trust* is a legal arrangement generally regulated by state law in which one party (the creator or grantor) transfers property to a second party (the trustee) who holds the property for the benefit of one or more third parties (the beneficiaries).

Revocable Trusts

If any member of a family has the right to withdraw the funds in a trust, the value of the trust is considered an asset [HCV GB, p. 5-25]. Any income earned as a result of investment of trust funds is counted as actual asset income, whether the income is paid to the family or deposited in the trust.

Non-revocable Trusts

In cases where a trust is not revocable by, or under the control of, any member of a family, the value of the trust fund is not considered an asset. However, any income distributed to the family from such a trust is counted as a periodic payment or a lump-sum receipt, as appropriate [24 CFR 5.603(b)]. (Periodic payments are covered in section 6-I.H. Lump-sum receipts are discussed earlier in this section.)

Retirement Accounts

Company Retirement/Pension Accounts

In order to correctly include or exclude as an asset any amount held in a company retirement or pension account by an employed person, the PHA must know whether the money is accessible before retirement [HCV GB, p. 5-26].

While a family member is employed, only the amount the family member can withdraw without retiring or terminating employment is counted as an asset [HCV GB, p. 5-26].

After a family member retires or terminates employment, any amount distributed to the family member is counted as a periodic payment or a lump-sum receipt, as appropriate [HCV GB, p. 5-26], except to the extent that it represents funds invested in the account by the family member. (For more on periodic payments, see section 6-I.H.) The balance in the account is counted as an asset only if it remains accessible to the family member.

IRA, Keogh, and Similar Retirement Savings Accounts

IRA, Keogh, and similar retirement savings accounts are counted as assets even though early withdrawal would result in a penalty [HCV GB, p. 5-25].

Personal Property

Personal property held as an investment, such as gems, jewelry, coin collections, antique cars, etc., is considered an asset [HCV GB, p. 5-25].

SFHA Policy

In determining the value of personal property held as an investment, the PHA will use the family's estimate of the value. The PHA may obtain an appraisal if there is reason to believe that the family's estimated value is off by \$50 or more. The family must cooperate with the appraiser but cannot be charged any costs related to the appraisal.

Generally, personal property held as an investment generates no income until it is disposed of. If regular income is generated (e.g., income from renting the personal property), the amount that is expected to be earned in the coming year is counted as actual income from the asset.

Necessary items of personal property are not considered assets [24 CFR 5.603(b)].

SFHA Policy

Necessary personal property consists of only those items not held as an investment. It may include clothing, furniture, household furnishings, jewelry, and vehicles, including those specially equipped for persons with disabilities.

Life Insurance

The cash value of a life insurance policy available to a family member before death, such as a whole life or universal life policy, is included in the calculation of the value of the family's assets [HCV GB 5-25]. The cash value is the surrender value. If such a policy earns dividends or interest that the family could elect to receive, the anticipated amount of dividends or interest is counted as income from the asset whether or not the family actually receives it.

6-I.H. PERIODIC PAYMENTS

Periodic payments are forms of income received on a regular basis. HUD regulations specify periodic payments that are and are not included in annual income.

Periodic Payments Included in Annual Income

- Periodic payments from sources such as social security, unemployment and welfare assistance, annuities, insurance policies, retirement funds, and pensions. However, periodic payments from retirement accounts, annuities, and similar forms of investments are counted only after they exceed the amount contributed by the family [24 CFR 5.609(b)(4) and (b)(3)].
- Disability or death benefits and lottery receipts paid periodically, rather than in a single lump sum [24 CFR 5.609(b)(4) and HCV, p. 5-14]

Lump-Sum Payments for the Delayed Start of a Periodic Payment

Most lump sums received as a result of delays in processing periodic payments, such as unemployment or welfare assistance, are counted as income. However, lump-sum receipts for the delayed start of periodic social security or supplemental security income (SSI) payments are not counted as income [CFR 5.609(b)(4)]. Additionally, any deferred disability benefits that are received in a lump sum or in prospective monthly amounts from the Department of Veterans Affairs are to be excluded from annual income [FR Notice 11/24/08].

SFHA Policy

When a delayed-start payment is received and reported during the period in which the PHA is processing an annual reexamination, the PHA will adjust the tenant rent retroactively for the period the payment was intended to cover. The family may pay in full any amount due or request to enter into a repayment agreement with the PHA.

See the chapter on reexaminations for information about a family's obligation to report lump-sum receipts between annual reexaminations.

Treatment of Overpayment Deductions from Social Security Benefits

The PHA must make a special calculation of annual income when the Social Security Administration (SSA) overpays an individual, resulting in a withholding or deduction from his or her benefit amount until the overpayment is paid in full. The amount and duration of the withholding will vary depending on the amount of the overpayment and the percent of the benefit rate withheld. Regardless of the amount withheld or the length of the withholding period, the PHA must use the reduced benefit amount after deducting only the amount of the overpayment withholding from the gross benefit amount [Notice PIH 2012-10].

Periodic Payments Excluded from Annual Income

- Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the tenant family, who are unable to live alone) [24 CFR 5.609(c)(2)]. Kinship care payments are considered equivalent to foster care payments and are also excluded from annual income [Notice PIH 2012-1].

SFHA Policy

The PHA will exclude payments for the care of foster children and foster adults only if the care is provided through an official arrangement with a local welfare agency [HCV GB, p. 5-18].

- Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home [24 CFR 5.609(c)(16)]
- Amounts received under the Low-Income Home Energy Assistance Program (42 U.S.C. 1626(c)) [24 CFR 5.609(c)(17)]
- Amounts received under the Child Care and Development Block Grant Act of 1990 (42 U.S.C. 9858q) [24 CFR 5.609(c)(17)]
- Earned Income Tax Credit (EITC) refund payments (26 U.S.C. 32(j)) [24 CFR 5.609(c)(17)].
Note: EITC may be paid periodically if the family elects to receive the amount due as part of payroll payments from an employer.
- Lump sums received as a result of delays in processing Social Security and SSI payments (see section 6-I.J.) [24 CFR 5.609(b)(4)].

6-I.I. PAYMENTS IN LIEU OF EARNINGS

Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation, and severance pay, are counted as income [24 CFR 5.609(b)(5)] if they are received either in the form of periodic payments or in the form of a lump-sum amount or prospective monthly amounts for the delayed start of a periodic payment. If they are received in a one-time lump sum (as a settlement, for instance), they are treated as lump-sum receipts [24 CFR 5.609(c)(3)]. (See also the discussion of periodic payments in section 6-I.H and the discussion of lump-sum receipts in section 6-I.G.)

6-I.J. WELFARE ASSISTANCE

Overview

Welfare assistance is counted in annual income. Welfare assistance includes Temporary Assistance for Needy Families (TANF) and any payments to individuals or families based on need that are made under programs funded separately or jointly by federal, state, or local governments [24 CFR 5.603(b)].

Sanctions Resulting in the Reduction of Welfare Benefits [24 CFR 5.615]

The PHA must make a special calculation of annual income when the welfare agency imposes certain sanctions on certain families. The full text of the regulation at 24 CFR 5.615 is provided as Exhibit 6-5. The requirements are summarized below. This rule applies only if a family was a public housing resident at the time the sanction was imposed.

Covered Families

The families covered by 24 CFR 5.615 are those “who receive welfare assistance or other public assistance benefits (‘welfare benefits’) from a State or other public agency (‘welfare agency’) under a program for which Federal, State or local law requires that a member of the family must participate in an economic self-sufficiency program as a condition for such assistance” [24 CFR 5.615(b)]

Imputed Income

When a welfare agency imposes a sanction that reduces a family’s welfare income because the family commits fraud or fails to comply with the agency’s economic self-sufficiency program or work activities requirement, the PHA must include in annual income “imputed” welfare income. The PHA must request that the welfare agency inform the PHA when the benefits of a public housing resident are reduced. The imputed income is the amount the family would have received if the family had not been sanctioned.

This requirement does not apply to reductions in welfare benefits: (1) at the expiration of the lifetime or other time limit on the payment of welfare benefits, (2) if a family member is unable to find employment even though the family member has complied with the welfare agency economic self-sufficiency or work activities requirements, or (3) because a family member has not complied with other welfare agency requirements [24 CFR 5.615(b)(2)].

For special procedures related to grievance hearings based upon the PHA’s denial of a family’s request to lower rent when the family experiences a welfare benefit reduction, see Chapter 14, Grievances and Appeals.

Offsets

The amount of the imputed income is offset by the amount of additional income the family begins to receive after the sanction is imposed. When the additional income equals or exceeds the imputed welfare income, the imputed income is reduced to zero [24 CFR 5.615(c)(4)].

6-I.K. PERIODIC AND DETERMINABLE ALLOWANCES [24 CFR 5.609(b)(7)]

Annual income includes periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from organizations or from persons not residing with a tenant family.

Alimony and Child Support

The PHA must count alimony or child support amounts awarded as part of a divorce or separation agreement.

SFHA Policy

The PHA will count court-awarded amounts for alimony and child support unless the PHA verifies that (1) the payments are not being made and (2) the family has made reasonable efforts to collect amounts due, including filing with courts or agencies responsible for enforcing payments [HCV GB, pp. 5-23 and 5-47].

Families who do not have court-awarded alimony and child support awards are not required to seek a court award and are not required to take independent legal action to obtain collection.

Regular Contributions or Gifts

The PHA must count as income regular monetary and nonmonetary contributions or gifts from persons not residing with a tenant family [24 CFR 5.609(b)(7)]. Temporary, nonrecurring, or sporadic income and gifts are not counted [24 CFR 5.609(c)(9)].

SFHA Policy

Examples of regular contributions include: (1) regular payment of a family's bills (e.g., utilities, telephone, rent, credit cards, and car payments), (2) cash or other liquid assets provided to any family member on a regular basis, and (3) "in-kind" contributions such as groceries and clothing provided to a family on a regular basis.

Nonmonetary contributions will be valued at the cost of purchasing the items, as determined by the PHA. For contributions that may vary from month to month (e.g., utility payments), the PHA will include an average amount based upon past history.

6-I.L. ADDITIONAL EXCLUSIONS FROM ANNUAL INCOME

Other exclusions contained in 24 CFR 5.609(c) that have not been discussed earlier in this chapter include the following:

- Reimbursement of medical expenses [24 CFR 5.609(c)(4)]
- The full amount of student financial assistance paid directly to the student or to the educational institution [24 CFR 5.609(c)(6)].

SFHA Policy

Regular financial support from parents or guardians to students for food, clothing personal items, and entertainment **is not** considered student financial assistance and is included **in** annual income.

- Amounts received by participants in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred and which are made solely to allow participation in a specific program [24 CFR 5.609(c)(8)(iii)]
- Foster care payments issued by the San Francisco Human Services Agency to caregivers of foster children according to 24 CFR 5.609(c)(2).
- Payments received under the Kin-GAP program, as well as other similar foster care assistance programs in other states, may be considered as payments received for the care of foster children thereby qualifying these payments to be excluded from income. (HUD Correspondence to Representative Maxine Waters, dated April 8, 2008.)
- Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS) [(24 CFR 5.609(c)(8)(ii)]
- Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era [24 CFR 5.609(c)(10)]
- Adoption assistance payments in excess of \$480 per adopted child [24 CFR 5.609(c)(12)]
- Refunds or rebates on property taxes paid on the dwelling unit [24 CFR 5.609(c)(15)]
- Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home [24 CFR 5.609(c)(16)]
- Amounts specifically excluded by any other federal statute [24 CFR 5.609(c)(17)]. HUD publishes an updated list of these exclusions periodically. It includes:
 - (a) The value of the allotment provided to an eligible household under the Food Stamp Act of 1977 (7 U.S.C. 2017 (b))
 - (b) Payments to Volunteers under the Domestic Volunteer Services Act of 1973 (42 U.S.C. 5044(g), 5058)
 - (c) Payments received under the Alaska Native Claims Settlement Act (43 U.S.C. 1626(c))

- (d) Income derived from certain sub marginal land of the United States that is held in trust for certain Indian tribes (25 U.S.C. 459e)
- (e) Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program (42 U.S.C. 8624(f))
- (f) Payments received under programs funded in whole or in part under the Job Training Partnership Act (29 U.S.C. 1552(b)) (Effective July 1, 2000, references to Job Training Partnership Act shall be deemed to refer to the corresponding provision of the Workforce Investment Act of 1998 (29 U.S.C. 2931).)
- (g) Income derived from the disposition of funds to the Grand River Band of Ottawa Indians (Pub. L. 94-540, 90 Stat. 2503-04)
- (h) The first \$2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U. S. Claims Court, the interests of individual Indians in trust or restricted lands, including the first \$2,000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands (25 U.S.C. 1407-1408)
- (i) Amounts of scholarships funded under title IV of the Higher Education Act of 1965, including awards under the federal work-study program or under the Bureau of Indian Affairs student assistance programs (20 U.S.C. 1087uu)
- (j) Payments received from programs funded under Title V of the Older Americans Act of 1985 (42 U.S.C. 3056(f))
- (k) Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in Re Agent-product liability litigation, M.D.L. No. 381 (E.D.N.Y.)
- (l) Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721)
- (m) The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990 (42 U.S.C. 9858q)
- (n) Earned income tax credit (EITC) refund payments received on or after January 1, 1991 (26 U.S.C. 32(j))
- (o) Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation (Pub. L. 95-433)
- (p) Allowances, earnings and payments to AmeriCorps participants under the National and Community Service Act of 1990 (42 U.S.C. 12637(d))
- (q) Any allowance paid under the provisions of 38 U.S.C. 1805 to a child suffering from spina bifida who is the child of a Vietnam veteran (38 U.S.C. 1805)
- (r) Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such

assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act (42 U.S.C. 10602)

- (s) Allowances, earnings and payments to individuals participating in programs under the Workforce Investment Act of 1998 (29 U.S.C. 2931)

PART II: ADJUSTED INCOME

6-II.A. INTRODUCTION

Overview

HUD regulations require PHAs to deduct from annual income any of five mandatory deductions for which a family qualifies. The resulting amount is the family's adjusted income. Mandatory deductions are found in 24 CFR 5.611.

5.611(a) Mandatory deductions. In determining adjusted income, the responsible entity (PHA) must deduct the following amounts from annual income:

- (1) \$480 for each dependent;
- (2) \$400 for any elderly family or disabled family;
- (3) The sum of the following, to the extent the sum exceeds three percent of annual income:
 - (i) Unreimbursed medical expenses of any elderly family or disabled family;
 - (ii) Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed. This deduction may not exceed the earned income received by family members who are 18 years of age or older and who are able to work because of such attendant care or auxiliary apparatus; and
- (4) Any reasonable child care expenses necessary to enable a member of the family to be employed or to further his or her education.

This part covers policies related to these mandatory deductions. Verification requirements related to these deductions are found in Chapter 7, Verifications.

Anticipating Expenses

SFHA Policy

Generally, the PHA will use current circumstances to anticipate expenses. When possible, for costs that are expected to fluctuate during the year (e.g., child care during school and non-school periods and cyclical medical expenses), the PHA will estimate costs based on historic data and known future costs.

If a family has an accumulated debt for medical or disability assistance expenses, the PHA will include as an eligible expense the portion of the debt that the family expects to pay during the period for which the income determination is being made. However, amounts previously deducted will not be allowed even if the amounts were not paid as expected in a preceding period. The PHA may require the family to provide documentation of payments made in the preceding year.

6-II.B. DEPENDENT DEDUCTION

A deduction of \$480 is taken for each dependent [24 CFR 5.611(a)(1)]. *Dependent* is defined as any family member other than the head, spouse, or co-head who is under the age of 18 or who is 18 or older and is a person with disabilities or a full-time student. Foster children, foster adults, and live-in aides are never considered dependents [24 CFR 5.603(b)].

6-II.C. ELDERLY OR DISABLED FAMILY DEDUCTION

A single deduction of \$400 is taken for any elderly or disabled family [24 CFR 5.611(a)(2)]. An *elderly family* is a family whose head, spouse, co-head, or sole member is 62 years of age or older, and a *disabled family* is a family whose head, spouse, co-head, or sole member is a person with disabilities [24 CFR 5.403].

6-II.D. MEDICAL EXPENSES DEDUCTION [24 CFR 5.611(a)(3)(i)]

Unreimbursed medical expenses may be deducted to the extent that, in combination with any disability assistance expenses, they exceed three percent of annual income.

The medical expense deduction is permitted only for families in which the head, spouse, or co-head is at least 62 or is a person with disabilities. If a family is eligible for a medical expense deduction, the medical expenses of all family members are counted [VG, p. 28].

Definition of *Medical Expenses*

HUD regulations define *medical expenses* at 24 CFR 5.603(b) to mean “medical expenses, including medical insurance premiums, that are anticipated during the period for which annual income is computed, and that are not covered by insurance.”

SFHA Policy

The most current IRS Publication 502, *Medical and Dental Expenses*, will be used to determine the costs that qualify as medical expenses.

Summary of Allowable Medical Expenses from IRS Publication 502	
Services of medical professionals	Substance abuse treatment programs
Surgery and medical procedures that are necessary, legal, non-cosmetic	Psychiatric treatment
Services of medical facilities	Ambulance services and some costs of transportation related to medical expenses
Hospitalization, long-term care, and in-home nursing services	The cost and care of necessary equipment related to a medical condition (e.g., eyeglasses/lenses, hearing aids, crutches, and artificial teeth)
Prescription medicines and insulin, but <u>not</u> nonprescription medicines even if recommended by a doctor	Cost and continuing care of necessary service animals
Improvements to housing directly related to medical needs (e.g., ramps for a wheel chair, handrails)	Medical insurance premiums or the cost of a health maintenance organization (HMO)
Note: This chart provides a summary of eligible medical expenses only. Detailed information is provided in IRS Publication 502. Medical expenses are considered only to the extent they are not reimbursed by insurance or some other source.	

Families That Qualify for Both Medical and Disability Assistance Expenses

SFHA Policy

This policy applies only to families in which the head, spouse, or co-head is 62 or older or is a person with disabilities.

When expenses anticipated by a family could be defined as either medical or disability assistance expenses, the PHA will consider them medical expenses unless it is clear that the expenses are incurred exclusively to enable a person with disabilities to work.

6-II.E. DISABILITY ASSISTANCE EXPENSES DEDUCTION [24 CFR 5.603(b) and 24 CFR 5.611(a)(3)(ii)]

Reasonable expenses for attendant care and auxiliary apparatus for a disabled family member may be deducted if they: (1) are necessary to enable a family member 18 years or older to work, (2) are not paid to a family member or reimbursed by an outside source, (3) in combination with any medical expenses, exceed three percent of annual income, and (4) do not exceed the earned income received by the family member who is enabled to work.

Earned Income Limit on the Disability Assistance Expense Deduction

A family can qualify for the disability assistance expense deduction only if at least one family member (who may be the person with disabilities) is enabled to work [24 CFR 5.603(b)].

The disability expense deduction is capped by the amount of “earned income received by family members who are 18 years of age or older and who are able to work” because of the expense [24 CFR 5.611(a)(3)(ii)]. The earned income used for this purpose is the amount verified before any earned income disallowances or income exclusions are applied.

SFHA Policy

The family must identify the family members enabled to work as a result of the disability assistance expenses. In evaluating the family’s request, the PHA will consider factors such as how the work schedule of the relevant family members relates to the hours of care provided, the time required for transportation, the relationship of the family members to the person with disabilities, and any special needs of the person with disabilities that might determine which family members are enabled to work.

When the PHA determines that the disability assistance expenses enable more than one family member to work, the disability assistance expenses will be capped by the sum of the family members’ incomes [PH Occ GB, p. 124].

Eligible Disability Expenses

Examples of auxiliary apparatus are provided in the *PH Occupancy Guidebook* as follows: “Auxiliary apparatus: Including wheelchairs, walkers, scooters, reading devices for persons with visual disabilities, equipment added to cars and vans to permit their use by the family member with a disability, or service animals” [PH Occ GB, p. 124], but only if these items are directly related to permitting the disabled person or other family member to work [HCV GB, p. 5-30].

HUD advises PHAs to further define and describe auxiliary apparatus [VG, p. 30].

Eligible Auxiliary Apparatus

SFHA Policy

Expenses incurred for maintaining or repairing an auxiliary apparatus are eligible. In the case of an apparatus that is specially adapted to accommodate a person with disabilities

(e.g., a vehicle or computer), the cost to maintain the special adaptations (but not maintenance of the apparatus itself) is an eligible expense. The cost of service animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included.

Eligible Attendant Care

The family determines the type of attendant care that is appropriate for the person with disabilities.

SFHA Policy

Attendant care includes, but is not limited to, reasonable costs for home medical care, nursing services, in-home or center-based care services, interpreters for persons with hearing impairments, and readers for persons with visual disabilities.

Attendant care expenses will be included for the period that the person enabled to work is employed plus reasonable transportation time. The cost of general housekeeping and personal services is not an eligible attendant care expense. However, if the person enabled to work is the person with disabilities, personal services necessary to enable the person with disabilities to work are eligible.

If the care attendant also provides other services to the family, the PHA will prorate the cost and allow only that portion of the expenses attributable to attendant care that enables a family member to work. For example, if the care provider also cares for a child who is not the person with disabilities, the cost of care must be prorated. Unless otherwise specified by the care provider, the calculation will be based upon the number of hours spent in each activity and/or the number of persons under care.

Payments to Family Members

No disability expenses may be deducted for payments to a member of a tenant family [23 CFR 5.603(b)]. However, expenses paid to a relative who is not a member of the tenant family may be deducted if they are reimbursed by an outside source.

Necessary and Reasonable Expenses

The family determines the type of care or auxiliary apparatus to be provided and must describe how the expenses enable a family member to work. The family must certify that the disability assistance expenses are necessary and are not paid or reimbursed by any other source.

SFHA Policy

The PHA determines the reasonableness of the expenses based on typical costs of care or apparatus in the locality. To establish typical costs, the PHA will collect information from organizations that provide services and support to persons with disabilities. A family may present, and the PHA will consider, the family's justification for costs that exceed typical costs in the area.

Families That Qualify for Both Medical and Disability Assistance Expenses

SFHA Policy

This policy applies only to families in which the head, spouse, or co-head is 62 or older or is a person with disabilities.

When expenses anticipated by a family could be defined as either medical or disability assistance expenses, the PHA will consider them medical expenses unless it is clear that the expenses are incurred exclusively to enable a person with disabilities to work.

6-II.F. CHILD CARE EXPENSE DEDUCTION

HUD defines *child care expenses* at 24 CFR 5.603(b) as “amounts anticipated to be paid by the family for the care of children under 13 years of age during the period for which annual income is computed, but only where such care is necessary to enable a family member to actively seek employment, be gainfully employed, or to further his or her education and only to the extent such amounts are not reimbursed. The amount deducted shall reflect reasonable charges for child care. In the case of child care necessary to permit employment, the amount deducted shall not exceed the amount of employment income that is included in annual income.”

Child care expenses do not include child support payments made to another on behalf of a minor who is not living in an assisted family’s household [VG, p. 26]. However, child care expenses for foster children that are living in the assisted family’s household, are included when determining the family’s child care expenses.

Qualifying for the Deduction

Determining Who Is Enabled to Pursue an Eligible Activity

SFHA Policy

The family must identify the family member(s) enabled to pursue an eligible activity. The term *eligible activity* in this section means any of the activities that may make the family eligible for a child care deduction (seeking work, pursuing an education, or being gainfully employed).

In evaluating the family’s request, the PHA will consider factors such as how the schedule for the claimed activity relates to the hours of care provided, the time required for transportation, the relationship of the family member(s) to the child, and any special needs of the child that might help determine which family member is enabled to pursue an eligible activity.

Seeking Work

SFHA Policy

If the child care expense being claimed is to enable a family member to seek employment, the family must provide evidence of the family member’s efforts to obtain employment at each reexamination. The deduction may be reduced or denied if the family member’s job search efforts are not commensurate with the child care expense being allowed by the PHA.

Furthering Education

SFHA Policy

If the child care expense being claimed is to enable a family member to further his or her education, the member must be enrolled in school (academic or vocational) or participating in a formal training program. The family member is not required to be a

full-time student, but the time spent in educational activities must be commensurate with the child care claimed.

Being Gainfully Employed

SFHA Policy

If the child care expense being claimed is to enable a family member to be gainfully employed, the family must provide evidence of the family member's employment during the time that child care is being provided. Gainful employment is any legal work activity (full- or part-time) for which a family member is compensated.

Earned Income Limit on Child Care Expense Deduction

When a family member looks for work or furthers his or her education, there is no cap on the amount that may be deducted for child care – although the care must still be necessary and reasonable. However, when child care enables a family member to work, the deduction is capped by “the amount of employment income that is included in annual income” [24 CFR 5.603(b)].

The earned income used for this purpose is the amount of earned income verified after any earned income disallowances or income exclusions are applied.

When the person who is enabled to work is a person who receives the earned income disallowance (EID) or a full-time student whose earned income above \$480 is excluded, child care costs related to enabling a family member to work may not exceed the portion of the person's earned income that actually is included in annual income. For example, if a family member who qualifies for the EID makes \$15,000 but because of the EID only \$5,000 is included in annual income, child care expenses are limited to \$5,000.

The PHA must not limit the deduction to the least expensive type of child care. If the care allows the family to pursue more than one eligible activity, including work, the cap is calculated in proportion to the amount of time spent working [HCV GB, p. 5-30].

SFHA Policy

When the child care expense being claimed is to enable a family member to work, only one family member's income will be considered for a given period of time. When more than one family member works during a given period, the PHA generally will limit allowable child care expenses to the earned income of the lowest-paid member. The family may provide information that supports a request to designate another family member as the person enabled to work.

Eligible Child Care Expenses

The type of care to be provided is determined by the tenant family. The PHA may not refuse to give a family the child care expense deduction because there is an adult family member in the household that may be available to provide child care [VG, p. 26].

Allowable Child Care Activities

SFHA Policy

For school-age children, costs attributable to public or private school activities during standard school hours are not considered. Expenses incurred for supervised activities after school or during school holidays (e.g., summer day camp, after-school sports league) are allowable forms of child care.

The costs of general housekeeping and personal services are not eligible. Likewise, child care expenses paid to a family member who lives in the family's unit are not eligible; however, payments for child care to relatives who do not live in the unit are eligible.

If a child care provider also renders other services to a family or child care is used to enable a family member to conduct activities that are not eligible for consideration, the PHA will prorate the costs and allow only that portion of the expenses that is attributable to child care for eligible activities. For example, if the care provider also cares for a child with disabilities who is 13 or older, the cost of care will be prorated. Unless otherwise specified by the child care provider, the calculation will be based upon the number of hours spent in each activity and/or the number of persons under care.

Necessary and Reasonable Costs

Child care expenses will be considered necessary if: (1) a family adequately explains how the care enables a family member to work, actively seek employment, or further his or her education, and (2) the family certifies, and the child care provider verifies, that the expenses are not paid or reimbursed by any other source.

SFHA Policy

Child care expenses will be considered for the time required for the eligible activity plus reasonable transportation time. For child care that enables a family member to go to school, the time allowed may include not more than one study hour for each hour spent in class.

To establish the reasonableness of child care costs, the PHA will use the schedule of child care costs from the local welfare agency. Families may present, and the PHA will consider, justification for costs that exceed typical costs in the area.

6-II.G. PERMISSIVE DEDUCTIONS [24 CFR 5.611(b)(1)]

Permissive deductions are additional, optional deductions that may be applied to annual income. As with mandatory deductions, permissive deductions must be based on need or family circumstance and deductions must be designed to encourage self-sufficiency or other economic purpose. If the PHA offers permissive deductions, they must be granted to all families that qualify for them and should complement existing income exclusions and deductions [PH Occ GB, p. 128].

The *Form HUD-50058 Instruction Booklet* states that the maximum allowable amount for total permissive deductions is less than \$90,000 per year.

SFHA Policy

The PHA has opted not to use permissive deductions.

PART III: CALCULATING RENT

6-III.A. OVERVIEW OF INCOME-BASED RENT CALCULATIONS

The first step in calculating income-based rent is to determine each family's total tenant payment (TTP). Then, if the family is occupying a unit that has tenant-paid utilities, the utility allowance is subtracted from the TTP. The result of this calculation, if a positive number, is the tenant rent. If the TTP is less than the utility allowance, the result of this calculation is a negative number, and is called the utility reimbursement, which may be paid to the family or directly to the utility company by the PHA.

TTP Formula [24 CFR 5.628]

HUD regulations specify the formula for calculating the total tenant payment (TTP) for a tenant family. TTP is the highest of the following amounts, rounded to the nearest dollar:

- 30 percent of the family's monthly adjusted income (adjusted income is defined in Part II)
- 10 percent of the family's monthly gross income (annual income, as defined in Part I, divided by 12)
- The welfare rent (in as-paid states only)
- A minimum rent between \$0 and \$50 that is established by the PHA

The PHA has authority to suspend and exempt families from minimum rent when a financial hardship exists, as defined in section 6-III.B.

Welfare Rent [24 CFR 5.628]

SFHA Policy

Welfare rent does not apply in this locality.

Minimum Rent [24 CFR 5.630]

SFHA Policy

The minimum rent for this locality is \$25.00.

Optional Changes to Income-Based Rents [24 CFR 960.253(c)(2) and PH Occ GB, pp. 131-134]

PHAs have been given very broad flexibility to establish their own, unique rent calculation systems as long as the rent produced is not higher than that calculated using the TTP and mandatory deductions. At the discretion of the PHA, rent policies may structure a system that uses combinations of permissive deductions, escrow accounts, income-based rents, and the required flat and minimum rents.

The PHA's minimum rent and rent choice policies still apply to affected families. Utility allowances are applied to PHA designed income-based rents in the same manner as they are applied to the regulatory income-based rents.

The choices are limited only by the requirement that the method used not produce a TTP or tenant rent greater than the TTP or tenant rent produced under the regulatory formula.

SFHA Policy

The PHA chooses not to adopt optional changes to income-based rents.

Utility Reimbursement [24 CFR 960.253(c)(3)]

Utility reimbursement occurs when any applicable utility allowance for tenant-paid utilities exceeds the TTP. HUD permits the PHA to pay the reimbursement to the family or directly to the utility provider.

SFHA Policy

The PHA will make utility reimbursements to the family.

6-III.B. FINANCIAL HARDSHIPS AFFECTING MINIMUM RENT [24 CFR 5.630]

SFHA Policy

The financial hardship rules described below apply in this jurisdiction because the PHA has established a minimum rent of \$25.00.

Overview

If the PHA establishes a minimum rent greater than zero, the PHA must grant an exemption from the minimum rent if a family is unable to pay the minimum rent because of financial hardship.

The financial hardship exemption applies only to families required to pay the minimum rent. If a family's TTP is higher than the minimum rent, the family is not eligible for a hardship exemption. If the PHA determines that a hardship exists, the TTP is the highest of the remaining components of the family's calculated TTP.

HUD-Defined Financial Hardship

Financial hardship includes the following situations:

- (1) The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program. This includes a family member who is a noncitizen lawfully admitted for permanent residence under the Immigration and Nationality Act who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996.

SFHA Policy

A hardship will be considered to exist only if the loss of eligibility has an impact on the family's ability to pay the minimum rent.

For a family waiting for a determination of eligibility, the hardship period will end as of the first of the month following (1) implementation of assistance, if approved, or (2) the decision to deny assistance. A family whose request for assistance is denied may request a hardship exemption based upon one of the other allowable hardship circumstances.

- (2) The family would be evicted because it is unable to pay the minimum rent.

SFHA Policy

For a family to qualify under this provision, the cause of the potential eviction must be the family's failure to pay rent or tenant-paid utilities.

- (3) Family income has decreased because of changed family circumstances, including the loss of employment.
- (4) A death has occurred in the family.

SFHA Policy

In order to qualify under this provision, a family must describe how the death has created a financial hardship (e.g., because of funeral-related expenses or the loss of the family member's income).

(5) The family has experienced other circumstances determined by the PHA.

SFHA Policy

The PHA has not established any additional hardship criteria.

Implementation of Hardship Exemption

Determination of Hardship

When a family requests a financial hardship exemption, the PHA must suspend the minimum rent requirement beginning the first of the month following the family's request.

The PHA then determines whether the financial hardship exists and whether the hardship is temporary or long-term.

SFHA Policy

The PHA defines temporary hardship as a hardship expected to last 90 days or less. Long term hardship is defined as a hardship expected to last more than 90 days.

The PHA may not evict the family for nonpayment of minimum rent during the 90-day period beginning the month following the family's request for a hardship exemption.

When the minimum rent is suspended, the TTP reverts to the highest of the remaining components of the calculated TTP. The example below demonstrates the effect of the minimum rent exemption.

Example: Impact of Minimum Rent Exemption			
Assume the PHA has established a minimum rent of \$35.			
TTP – No Hardship		TTP – With Hardship	
\$0	30% of monthly adjusted income	\$0	30% of monthly adjusted income
\$15	10% of monthly gross income	\$15	10% of monthly gross income
N/A	Welfare rent	N/A	Welfare rent
\$25	Minimum rent	\$25	Minimum rent
Minimum rent applies. TTP = \$25		Hardship exemption granted. TTP = \$15	

SFHA Policy

To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship and how the hardship has affected the family's ability to pay the minimum rent.

The PHA will make the determination of hardship within 30 calendar days.

No Financial Hardship

If the PHA determines there is no financial hardship, the PHA will reinstate the minimum rent and require the family to repay the amounts suspended.

For procedures pertaining to grievance hearing requests based upon the PHA's denial of a hardship exemption, see Chapter 14, Grievances and Appeals.

SFHA Policy

The PHA will require the family to repay the suspended amount within 30 calendar days of the PHA's notice that a hardship exemption has not been granted.

Temporary Hardship

If the PHA determines that a qualifying financial hardship is temporary, the PHA must reinstate the minimum rent from the beginning of the first of the month following the date of the family's request for a hardship exemption.

The family must resume payment of the minimum rent and must repay the PHA the amounts suspended. HUD requires the PHA to offer a reasonable repayment agreement, on terms and conditions established by the PHA. The PHA also may determine that circumstances have changed and the hardship is now a long-term hardship.

For procedures pertaining to grievance hearing requests based upon the PHA's denial of a hardship exemption, see Chapter 14, Grievances and Appeals.

SFHA Policy

The PHA will enter into a repayment agreement in accordance with the PHA's repayment agreement policy (see Chapter 16).

Long-Term Hardship

If the PHA determines that the financial hardship is long-term, the PHA must exempt the family from the minimum rent requirement for so long as the hardship continues. The exemption will apply from the first of the month following the family's request until the end of the qualifying hardship. When the financial hardship has been determined to be long-term, the family is not required to repay the minimum rent.

SFHA Policy

The hardship period ends when any of the following circumstances apply:

- (1) At an interim or annual reexamination, the family's calculated TTP is greater than the minimum rent.
- (2) For hardship conditions based on loss of income, the hardship condition will continue to be recognized until new sources of income are received that are at least equal to the amount lost. For example, if a hardship is approved because a family no longer receives a \$60/month child support payment, the hardship will continue to exist until the family receives at least \$60/month in income from another source or once again begins to receive the child support.
- (3) For hardship conditions based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred.

6-III.C. UTILITY ALLOWANCES [24 CFR 965, Subpart E]

Overview

Utility allowances are provided to families paying income-based rents when the cost of utilities is not included in the rent. When determining a family's income-based rent, the PHA must use the utility allowance applicable to the type of dwelling unit leased by the family.

For policies on establishing and updating utility allowances, see Chapter 16.

Reasonable Accommodation [24 CFR 8]

On request from a family, PHAs must approve a utility allowance that is higher than the applicable amount for the dwelling unit if a higher utility allowance is needed as a reasonable accommodation to make the program accessible to and usable by the family with a disability [PH Occ GB, p. 172].

Residents with disabilities may not be charged for the use of certain resident-supplied appliances if there is a verified need for special equipment because of the disability [PH Occ GB, p. 172].

See Chapter 2 for policies related to reasonable accommodations.

Utility Allowance Revisions [24 CFR 965.507]

The PHA must review its schedule of utility allowances each year. Between annual reviews, the PHA must revise the utility allowance schedule if there is a rate change that by itself or together with prior rate changes not adjusted for, results in a change of 10 percent or more from the rate on which such allowances were based. Adjustments to resident payments as a result of such changes must be retroactive to the first day of the month following the month in which the last rate change taken into account in such revision became effective [PH Occ GB, p. 171].

The tenant rent calculations must reflect any changes in the PHA's utility allowance schedule [24 CFR 960.253(c)(3)].

SFHA Policy

Unless the PHA is required to revise utility allowances retroactively, revised utility allowances will be applied to a family's rent calculations at the first annual reexamination after the allowance is adopted.

6-III.D. PRORATED RENT FOR MIXED FAMILIES [24 CFR 5.520]

HUD regulations prohibit assistance to ineligible family members. A *mixed family* is one that includes at least one U.S. citizen or eligible immigrant and any number of ineligible family members. The PHA must prorate the assistance provided to a mixed family. The PHA will first determine TTP as if all family members were eligible and then prorate the rent based upon the number of family members that actually are eligible. To do this, the PHA must:

- (1) Subtract the TTP from a maximum rent applicable to the unit. The result is the maximum subsidy for which the family could qualify if all members were eligible.
- (2) Divide the family maximum subsidy by the number of persons in the family to determine the maximum subsidy per each family member who is eligible (member maximum subsidy).
- (3) Multiply the member maximum subsidy by the number of eligible family members.
- (4) Subtract the subsidy calculated in the last step from the maximum rent. This is the prorated TTP.
- (5) Subtract the utility allowance for the unit from the prorated TTP. This is the prorated rent for the mixed family.

SFHA Policy

Revised public housing maximum rents will be applied to a family's rent calculation at the first annual reexamination after the revision is adopted.

For policies related to the establishment of the public housing maximum rent see Chapter 16.

6-III.E. FLAT RENTS AND FAMILY CHOICE IN RENTS [24 CFR 960.253]

Flat Rents [24 CFR 960.253(b)]

The flat rent is designed to encourage self-sufficiency and to avoid creating disincentives for continued residency by families who are attempting to become economically self-sufficient.

There is no utility allowance or reimbursement with flat rents. When the family elects to pay the flat rent, the flat rent amount quoted to the family by the PHA is the amount the family pays. Changes in family income, expenses, or composition will not affect the flat rent amount because it is outside the income-based formula.

Policies related to the reexamination of families paying flat rent are contained in Chapter 9, and policies related to the establishment and review of flat rents are contained in Chapter 16.

Family Choice in Rents [24 CFR 960.253(a) and (e)]

Once each year, the PHA must offer families the choice between a flat rent and an income-based rent. The family may not be offered this choice more than once a year. The PHA must document that flat rents were offered to families under the methods used to determine flat rents for the PHA.

SFHA Policy

The annual PHA offer to a family of the choice between flat and income-based rent will be conducted upon admission and upon each subsequent annual reexamination.

The PHA will require families to submit their choice of flat or income-based rent in writing and will maintain such requests in the tenant file as part of the admission or annual reexamination process.

The PHA must provide sufficient information for families to make an informed choice. This information must include the PHA's policy on switching from flat rent to income-based rent due to financial hardship and the dollar amount of the rent under each option. However, if the family chose the flat rent for the previous year the PHA is required to provide an income-based rent amount only in the year that a reexamination of income is conducted or if the family specifically requests it and submits updated income information.

Switching from Flat Rent to Income-Based Rent Due to Hardship [24 CFR 960.253(f)]

A family can opt to switch from flat rent to income-based rent at any time if they are unable to pay the flat rent due to financial hardship. If the PHA determines that a financial hardship exists, the PHA must immediately allow the family to switch from flat rent to the income-based rent.

SFHA Policy

Upon determination by the PHA that a financial hardship exists, the PHA will allow a family to switch from flat rent to income-based rent effective the first of the month following the family's request.

Reasons for financial hardship include:

- The family has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the family, or reduction in or loss of earnings or other assistance
- The family has experienced an increase in expenses, because of changed circumstances, for medical costs, child care, transportation, education, or similar items
- Such other situations determined by the PHA to be appropriate

SFHA Policy

The PHA considers payment of flat rent to be a financial hardship whenever the switch to income-based rent would be lower than the flat rent [PH Occ GB, p. 137].

Change in Flat Rents

SFHA Policy

Changes to flat rents, up or down, will not affect families paying flat rent until their next annual flat rent offer, at which time the family will be given the choice of switching back to income-based rent or of remaining on flat rent at the current (most recently adjusted) flat rent for their unit [PH Occ GB, pp. 137-138].

Flat Rents and Earned Income Disallowance [A&O FAQs]

Because the EID is a function of income-based rents, a family paying flat rent cannot qualify for the EID even if a family member experiences an event that would qualify the family for the EID. If the family later chooses to pay income-based rent, they would only qualify for the EID if a new qualifying event occurred.

A family currently paying flat rent that previously qualified for the EID while paying income-based rent and is currently within their 48 month period would have the 12 cumulative months of full (100 percent) and phase-in (50 percent) exclusion continue while paying flat rent as long as the employment that is the subject of the exclusion continues, and the 48-month lifetime limit would continue uninterrupted. A family paying flat rent could therefore see a family member's 48-month lifetime limit expire while the family is paying flat rent.

Flat Rents and Mixed Families [A&O FAQs]

Mixed families electing to pay flat rent must first have a flat rent worksheet completed to see if the flat rent must be prorated. The worksheet is located in Appendix III of the *Form HUD-50058 Instruction Booklet*.

If the flat rent is greater than or equal to the public housing maximum rent, there is no proration of flat rent and the family pays the flat rent for the unit.

If the flat rent is less than the maximum rent, the worksheet will calculate a prorated flat rent. The mixed family will pay the prorated flat rent.

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EXHIBIT 6-1: ANNUAL INCOME INCLUSIONS

24 CFR 5.609

(a) Annual income means all amounts, monetary or not, which:

- (1) Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or
- (2) Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
- (3) Which are not specifically excluded in paragraph (c) of this section.
- (4) Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

(b) Annual income includes, but is not limited to:

- (1) The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services;
- (2) The net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family;

(3) Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation is permitted only as authorized in paragraph (b)(2) of this section. Any withdrawal of cash or assets from an investment will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested by the family. Where the family has net family assets in excess of \$5,000, annual income shall include the greater of the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate, as determined by HUD;

(4) The full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts, including a lump-sum amount or prospective monthly amounts for the delayed start of a periodic amount (except as provided in paragraph (c)(14) of this section);

(5) Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation and severance pay (except as provided in paragraph (c)(3) of this section);

(6) Welfare assistance payments.

(i) Welfare assistance payments made under the Temporary Assistance for Needy Families (TANF) program are included in annual income only to the extent such payments:

(A) Qualify as assistance under the TANF program definition at 45 CFR 260.31¹; and

(B) Are not otherwise excluded under paragraph (c) of this section.

¹ Text of 45 CFR 260.31 follows (next page).

(ii) If the welfare assistance payment includes an amount specifically designated for shelter and utilities that is subject to adjustment by the welfare assistance agency in accordance with the actual cost of shelter and utilities, the amount of welfare assistance income to be included as income shall consist of:

(A) The amount of the allowance or grant exclusive of the amount specifically designated for shelter or utilities; plus

(B) The maximum amount that the welfare assistance agency could in fact allow the family for shelter and utilities. If the family's welfare assistance is ratably reduced from the standard of need by applying a percentage, the amount calculated under this paragraph shall be the amount resulting from one application of the percentage.

(7) Periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from organizations or from persons not residing in the dwelling;

(8) All regular pay, special pay and allowances of a member of the Armed Forces (except as provided in paragraph (c)(7) of this section)

(9) For Housing Choice Voucher programs only and as provided in 24 CFR 5.612, any financial assistance, in excess of amounts received for tuition, that an individual receives under the Higher Education Act of 1965 (20 U.S.C. 1001 *et seq.*), from private sources, or from an institution of higher education (as defined under the Higher Education Act of 1965 (20 U.S.C. 1002)), shall be considered income to that individual, except that financial assistance described in this paragraph is not considered annual income for persons over the age of 23 with dependent children. For purposes of this paragraph, "financial assistance" does not include loan proceeds for the purpose of determining income.

HHS DEFINITION OF "ASSISTANCE"

45 CFR: GENERAL TEMPORARY ASSISTANCE FOR NEEDY FAMILIES

260.31 What does the term "assistance" mean?

(a)(1) The term "assistance" includes cash, payments, vouchers, and other forms of benefits designed to meet a family's ongoing basic needs (i.e., for food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses).

(2) It includes such benefits even when they are:

(i) Provided in the form of payments by a TANF agency, or other agency on its behalf, to individual recipients; and

(ii) Conditioned on participation in work experience or community service (or any other work activity under 261.30 of this chapter).

(3) Except where excluded under paragraph (b) of this section, it also includes supportive services such as transportation and child care provided to families who are not employed.

(b) [The definition of "assistance"] excludes: (1) Nonrecurrent, short-term benefits that:

(i) Are designed to deal with a specific crisis situation or episode of need;

(ii) Are not intended to meet recurrent or ongoing needs; and

(iii) Will not extend beyond four months.

(2) Work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training);

(3) Supportive services such as child care and transportation provided to families who are employed;

(4) Refundable earned income tax credits;

(5) Contributions to, and distributions from, Individual Development Accounts;

(6) Services such as counseling, case management, peer support, child care information and referral, transitional services, job retention, job advancement, and other employment-related services that do not provide basic income support; and

(7) Transportation benefits provided under a Job Access or Reverse Commute project, pursuant to section 404(k) of [the Social Security] Act, to an individual who is not otherwise receiving assistance

EXHIBIT 6-2: ANNUAL INCOME EXCLUSIONS

24 CFR 5.609

(c) Annual income does not include the following:

- (1) Income from employment of children (including foster children) under the age of 18 years;
- (2) Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the tenant family, who are unable to live alone);
- (3) Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses (except as provided in paragraph (b)(5) of this section);
- (4) Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member;
- (5) Income of a live-in aide, as defined in Sec. 5.403;
- (6) Subject to paragraph (b)(9) of this section, the full amount of student financial assistance paid directly to the student or to the educational institution;
- (7) The special pay to a family member serving in the Armed Forces who is exposed to hostile fire;
- (8) (i) Amounts received under training programs funded by HUD;
- (ii) Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS);
- (iii) Amounts received by a participant in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred (special equipment, clothing, transportation, child care, etc.) and which are made solely to allow participation in a specific program;
- (iv) Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time;
- (v) Incremental earnings and benefits resulting to any family member from participation in qualifying State or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for the period during which the family member participates in the employment training program;
- (9) Temporary, nonrecurring or sporadic income (including gifts);
- (10) Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;
- (11) Earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of household and spouse);
- (12) Adoption assistance payments in excess of \$480 per adopted child;
- (13) [Reserved]
- (14) Deferred periodic amounts from supplemental security income and social security benefits that are received in a lump sum amount or in prospective monthly amounts.

(15) Amounts received by the family in the form of refunds or rebates under State or local law for property taxes paid on the dwelling unit;

(16) Amounts paid by a State agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home; or

(17) Amounts specifically excluded by any other Federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions set forth in 24 CFR 5.609(c) apply. A notice will be published in the Federal Register and distributed to PHAs and housing owners identifying the benefits that qualify for this exclusion. Updates will be published and distributed when necessary. [See the following chart for a list of benefits that qualify for this exclusion.]

<p>Sources of Income Excluded by Federal Statute from Consideration as Income for Purposes of Determining Eligibility or Benefits</p>

a) The value of the allotment provided to an eligible household under the Food Stamp Act of 1977 (7 U.S.C. 2017 (b));

b) Payments to Volunteers under the Domestic Volunteer Services Act of 1973 (42 U.S.C. 5044(g), 5058);

c) Payments received under the Alaska Native Claims Settlement Act (43 U.S.C. 1626(c));

d) Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes (25 U.S.C. 459e);

e) Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program (42 U.S.C. 8624(f));

f) Payments received under programs funded in whole or in part under the Job Training Partnership Act (29 U.S.C. 1552(b)); (effective July 1, 2000, references to Job Training Partnership Act shall be deemed to refer to the corresponding provision of the Workforce Investment Act of 1998 (29 U.S.C. 2931);

g) Income derived from the disposition of funds to the Grand River Band of Ottawa Indians (Pub.L- 94-540, 90 Stat. 2503-04);

h) The first \$2000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U. S. Claims Court, the interests of individual Indians in trust or restricted lands, including the first \$2000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands (25 U.S.C. 1407-1408);

i) Amounts of scholarships funded under title IV of the Higher Education Act of 1965, including awards under federal work-study program or under the Bureau of Indian Affairs student assistance programs (20 U.S.C. 1087uu);

j) Payments received from programs funded under Title V of the Older Americans Act of 1985 (42 U.S.C. 3056(f));

k) Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in In Re Agent-product liability litigation, M.D.L. No. 381 (E.D.N.Y.);

l) Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721);

m) The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990 (42 U.S.C. 9858q);

- n) Earned income tax credit (EITC) refund payments received on or after January 1, 1991 (26 U.S.C. 32(j));
- o) Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation (Pub. L. 95-433);
- p) Allowances, earnings and payments to AmeriCorps participants under the National and Community Service Act of 1990 (42 U.S.C. 12637(d));
- q) Any allowance paid under the provisions of 38 U.S.C. 1805 to a child suffering from

- spina bifida who is the child of a Vietnam veteran (38 U.S.C. 1805);
- r) Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act (42 U.S.C. 10602); and
- s) Allowances, earnings and payments to individuals participating in programs under the Workforce Investment Act of 1998 (29 U.S.C. 2931).

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EXHIBIT 6-3: TREATMENT OF FAMILY ASSETS

24 CFR 5.603(b) Net Family Assets

(1) Net cash value after deducting reasonable costs that would be incurred in disposing of real property, savings, stocks, bonds, and other forms of capital investment, excluding interests in Indian trust land and excluding equity accounts in HUD homeownership programs. The value of necessary items of personal property such as furniture and automobiles shall be excluded.

(2) In cases where a trust fund has been established and the trust is not revocable by, or under the control of, any member of the family or household, the value of the trust fund will not be considered an asset so long as the fund continues to be held in trust. Any income distributed from the trust fund shall be counted when determining annual income under Sec. 5.609.

(3) In determining net family assets, PHAs or owners, as applicable, shall include the value of any business or family assets disposed of by an applicant or tenant for less than fair market value (including a disposition in trust, but not in a foreclosure or bankruptcy sale) during the two years preceding the date of application for the program or reexamination, as applicable, in excess of the consideration received there for. In the case of a disposition as part of a separation or divorce settlement, the disposition will not be considered to be for less than fair market value if the applicant or tenant receives important consideration not measurable in dollar terms.

(4) For purposes of determining annual income under Sec. 5.609, the term "net family assets" does not include the value of a home currently being purchased with assistance under part 982, subpart M of this title. This exclusion is limited to the first 10 years after the purchase date of the home.

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EXHIBIT 6-4: EARNED INCOME DISALLOWANCE
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24 CFR 960.255 Self-sufficiency incentive–Disallowance of increase in annual income.

(a) *Definitions.* The following definitions apply for purposes of this section.

Disallowance. Exclusion from annual income.

Previously unemployed includes a person who has earned, in the twelve months previous to employment, no more than would be received for 10 hours of work per week for 50 weeks at the established minimum wage.

Qualified family. A family residing in public housing:

(i) Whose annual income increases as a result of employment of a family member who was unemployed for one or more years previous to employment;

(ii) Whose annual income increases as a result of increased earnings by a family member during participation in any economic self-sufficiency or other job training program; or

(iii) Whose annual income increases, as a result of new employment or increased earnings of a family member, during or within six months after receiving assistance, benefits or services under any state program for temporary assistance for needy families funded under Part A of Title IV of the Social Security Act, as determined by the PHA in consultation with the local agencies administering temporary assistance for needy families (TANF) and Welfare-to-Work (WTW) programs. The TANF program is not limited to monthly income maintenance, but also includes such benefits and services as one-time payments, wage subsidies and transportation assistance—provided that the total amount over a six-month period is at least \$500.

(b) *Disallowance of increase in annual income.*

(1) *Initial twelve month exclusion.* During the cumulative twelve month period beginning on the date a member of a qualified family is first employed or the family first experiences an increase in annual income attributable to employment, the PHA must exclude from annual income (as defined in 5.609 of this title) of a qualified family any increase in income of the family member as a result of employment over prior income of that family member.

(2) *Second twelve month exclusion and phase-in.* During the second cumulative twelve month period after the date a member of a qualified family is first employed or the family first experiences an increase in annual income attributable to employment, the PHA must exclude from annual income of a qualified family fifty percent of any increase in income of such family member as a result of employment over income of that family member prior to the beginning of such employment.

(3) *Maximum four year disallowance.* The disallowance of increased income of an individual family member as provided in paragraph (b)(1) or (b)(2) of this section is limited to a lifetime 48 month period. It only applies for a maximum of twelve months for disallowance under paragraph (b)(1) and a maximum of twelve months for disallowance under paragraph (b)(2), during the 48 month period starting from the initial exclusion under paragraph (b)(1) of this section.

(c) *Inapplicability to admission.* The disallowance of increases in income as a result of employment under this section does not apply for purposes of admission to the program (including the determination of income eligibility and income targeting).

(d) *Individual Savings Accounts.* As an alternative to the disallowance of increases in income as a result of employment described in paragraph (b) of this section, a PHA may choose to provide for individual savings accounts for public housing residents who pay an income-based rent, in accordance with a written policy, which must include the following provisions:

(1) The PHA must advise the family that the savings account option is available;

- (2) At the option of the family, the PHA must deposit in the savings account the total amount that would have been included in tenant rent payable to the PHA as a result of increased income that is disallowed in accordance with paragraph (b) of this section;
- (3) Amounts deposited in a savings account may be withdrawn only for the purpose of:
 - (i) Purchasing a home;
 - (ii) Paying education costs of family members;
 - (iii) Moving out of public or assisted housing; or
 - (iv) Paying any other expense authorized by the PHA for the purpose of promoting the economic self-sufficiency of residents of public housing;
- (4) The PHA must maintain the account in an interest bearing investment and must credit the family with the net interest income, and the PHA may not charge a fee for maintaining the account;
- (5) At least annually the PHA must provide the family with a report on the status of the account; and
- (6) If the family moves out of public housing, the PHA shall pay the tenant any balance in the account, minus any amounts owed to the PHA.

EXHIBIT 6-5: THE EFFECT OF WELFARE BENEFIT REDUCTION

24 CFR 5.615**Public housing program and Housing Choice Voucher tenant-based assistance program:
How welfare benefit reduction affects family income.**

(a) Applicability. This section applies to covered families who reside in public housing (part 960 of this title) or receive Housing Choice Voucher tenant-based assistance (part 982 of this title).

(b) Definitions. The following definitions apply for purposes of this section:

Covered families. Families who receive welfare assistance or other public assistance benefits ("welfare benefits") from a State or other public agency ("welfare agency") under a program for which Federal, State, or local law requires that a member of the family must participate in an economic self-sufficiency program as a condition for such assistance.

Economic self-sufficiency program. See definition at Sec. 5.603.

Imputed welfare income. The amount of annual income not actually received by a family, as a result of a specified welfare benefit reduction, that is nonetheless included in the family's annual income for purposes of determining rent.

Specified welfare benefit reduction.

(1) A reduction of welfare benefits by the welfare agency, in whole or in part, for a family member, as determined by the welfare agency, because of fraud by a family member in connection with the welfare program; or because of welfare agency sanction against a family member for noncompliance with a welfare agency requirement to participate in an economic self-sufficiency program.

(2) "Specified welfare benefit reduction" does not include a reduction or termination of welfare benefits by the welfare agency:

(i) at expiration of a lifetime or other time limit on the payment of welfare benefits;

(ii) because a family member is not able to obtain employment, even though the family member has complied with welfare agency economic self-sufficiency or work activities requirements; or

(iii) because a family member has not complied with other welfare agency requirements.

(c) Imputed welfare income.

(1) A family's annual income includes the amount of imputed welfare income (because of a specified welfare benefits reduction, as specified in notice to the PHA by the welfare agency), plus the total amount of other annual income as determined in accordance with Sec. 5.609.

(2) At the request of the PHA, the welfare agency will inform the PHA in writing of the amount and term of any specified welfare benefit reduction for a family member, and the reason for such reduction, and will also inform the PHA of any subsequent changes in the term or amount of such specified welfare benefit reduction. The PHA will use this information to determine the amount of imputed welfare income for a family.

(3) A family's annual income includes imputed welfare income in family annual income, as determined at the PHA's interim or regular reexamination of family income and composition, during the term of the welfare benefits reduction (as specified in information provided to the PHA by the welfare agency).

(4) The amount of the imputed welfare income is offset by the amount of additional income a family receives that commences after the time the sanction was imposed. When such additional income from other sources is at least equal to the imputed

(5) The PHA may not include imputed welfare income in annual income if the family was not an assisted resident at the time of sanction.

(d) Review of PHA decision.

(1) Public housing. If a public housing tenant claims that the PHA has not correctly calculated the amount of imputed welfare income in accordance with HUD requirements, and if the PHA denies the family's request to modify such amount, the PHA shall give the tenant written notice of such denial, with a brief explanation of the basis for the PHA determination of the amount of imputed welfare income. The PHA notice shall also state that if the tenant does not agree with the PHA determination, the tenant may request a grievance hearing in accordance with part 966, subpart B of this title to review the PHA determination. The tenant is not required to pay an escrow deposit pursuant to Sec. 966.55(e) for the portion of tenant rent attributable to the imputed welfare income in order to obtain a grievance hearing on the PHA determination.

(2) Housing Choice Voucher Program participant. A participant in the H tenant-based assistance program may request an informal hearing, in accordance with Sec. 982.555 of this title, to review the PHA determination of the amount of imputed welfare income that must be included in the family's annual income in accordance with this section. If the family claims that such amount is not correctly calculated in accordance with HUD requirements, and if the PHA denies the family's request to modify such amount, the PHA shall give the family written notice of such denial, with a brief explanation of the basis for the PHA determination of the amount of imputed welfare income. Such notice shall also state that if the family does not agree with the PHA determination, the family may request an informal hearing on the determination under the PHA hearing procedure.

(e) PHA relation with welfare agency.

(1) The PHA must ask welfare agencies to inform the PHA of any specified welfare benefits reduction for a family member, the reason for such reduction, the term of any such reduction, and any subsequent welfare agency determination affecting the amount or term of a specified welfare benefits reduction. If the welfare agency determines a specified welfare benefits reduction for a family member, and gives the PHA written notice of such reduction, the family's annual incomes shall include the imputed welfare income because of the specified welfare benefits reduction.

(2) The PHA is responsible for determining the amount of imputed welfare income that is included in the family's annual income as a result of a specified welfare benefits reduction as determined by the welfare agency, and specified in the notice by the welfare agency to the PHA. However, the PHA is not responsible for determining whether a reduction of welfare benefits by the welfare agency was correctly determined by the welfare agency in accordance with welfare program requirements and procedures, nor for providing the opportunity for review or hearing on such welfare agency determinations.

(3) Such welfare agency determinations are the responsibility of the welfare agency, and the family may seek appeal of such determinations through the welfare agency's normal due process procedures. The PHA shall be entitled to rely on the welfare agency notice to the PHA of the welfare agency's determination of a specified welfare benefits reduction.

Chapter 7

VERIFICATION

[24 CFR 960.259, 24 CFR 5.230, Notice PIH 2010-19]

INTRODUCTION

The PHA must verify all information that is used to establish the family's eligibility and level of assistance and is required to obtain the family's consent to collect the information. Applicants and tenants must cooperate with the verification process as a condition of receiving assistance. The PHA must not pass on the cost of verification to the family.

The PHA will follow the verification guidance provided by HUD in Notice PIH 2010-19 and any subsequent guidance issued by HUD. This chapter summarizes those requirements and provides supplementary PHA policies.

Part I describes the general verification process. More detailed requirements related to individual factors are provided in subsequent parts including family information (Part II), income and assets (Part III), and mandatory deductions (Part IV).

Verification policies, rules and procedures will be modified as needed to accommodate persons with disabilities. All information obtained through the verification process will be handled in accordance with the records management policies established by the PHA.

PART I: GENERAL VERIFICATION REQUIREMENTS

7-I.A. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 960.259, 24 CFR 5.230]

The family must supply any information that the PHA or HUD determines is necessary to the administration of the program and must consent to PHA verification of that information [24 CFR 960.259(a)(1)].

Consent Forms

It is required that all adult applicants and tenants sign form HUD-9886, Authorization for Release of Information. The purpose of form HUD-9886 is to facilitate automated data collection and computer matching from specific sources and provides the family's consent only for the specific purposes listed on the form. HUD and the PHA may collect information from State Wage Information Collection Agencies (SWICAs) and current and former employers of adult family members. Only HUD is authorized to collect information directly from the Internal Revenue Service (IRS) and the Social Security Administration (SSA). Adult family members must sign other consent forms as needed to collect information relevant to the family's eligibility and level of assistance.

Penalties for Failing to Consent [24 CFR 5.232]

If any family member who is required to sign a consent form fails to do so, the PHA will deny admission to applicants and terminate the lease of tenants. The family may request a hearing in accordance with the PHA's grievance procedures.

7-I.B. OVERVIEW OF VERIFICATION REQUIREMENTS

HUD's Verification Hierarchy [Notice PIH 2010-19]

HUD authorizes the PHA to use six methods to verify family information and specifies the circumstances in which each method will be used. In general HUD requires the PHA to use the most reliable form of verification that is available and to document the reasons when the PHA uses a lesser form of verification.

SFHA Policy

In order of priority, the forms of verification that the PHA will use are:

Up-front Income Verification (UIV) using HUD's Enterprise Income Verification (EIV) system

Up-front Income Verification (UIV) using a non-HUD system

Written Third Party Verification (may be provided by applicant or resident)

Written Third-party Verification Form

Oral Third-party Verification

Self-Certification

Each of the verification methods is discussed in subsequent sections below.

Requirements for Acceptable Documents

SFHA Policy

Any documents used for verification must be the original (not photocopies) and generally must be dated within 60 days of the date they are provided to the PHA. The documents must not be damaged, altered or in any way illegible.

Print-outs from official web pages are considered original documents.

The PHA staff member who views the original document must make a photocopy, annotate the copy with the name of the person who provided the document and the date the original was viewed, and sign the copy.

Any family self-certifications must be made in a format acceptable to the PHA and must be signed in the presence of a PHA representative or PHA notary public.

File Documentation

The PHA must document in the file how the figures used in income and rent calculations were determined. All verification attempts, information obtained, and decisions reached during the verification process will be recorded in the family's file in sufficient detail to demonstrate that the PHA has followed all of the verification policies set forth in this ACOP. The record should be sufficient to enable a staff member or HUD reviewer to understand the process followed and conclusions reached.

SFHA Policy

The PHA will document, in the family file, the following:

Reported family annual income

Value of assets

Expenses related to deductions from annual income

Other factors influencing the adjusted income or income-based rent determination

When the PHA is unable to obtain third-party verification, the PHA will document in the family file the reason that third-party verification was not available [24 CFR 960.259(c)(1); Notice PIH 2010-19].

7-I.C. UP-FRONT INCOME VERIFICATION (UIV)

Up-front income verification (UIV) refers to the PHA's use of the verification tools available from independent sources that maintain computerized information about earnings and benefits. UIV will be used to the extent that these systems are available to the PHA.

There may be legitimate differences between the information provided by the family and UIV-generated information. If the family disputes the accuracy of UIV data, no adverse action can be taken until the PHA has independently verified the UIV information and the family has been granted the opportunity to contest any adverse findings through the PHA's informal review/hearing processes. (For more on UIV and income projection, see section 6-I.C.)

Upfront Income Verification Using HUD's Enterprise Income Verification (EIV) System (Mandatory)

HUD's EIV system contains data showing earned income, unemployment benefits, social security benefits, and SSI benefits for resident families. HUD requires the PHA to use the EIV system in its entirety. The following policies apply to the use of HUD's EIV system.

EIV Income Reports

The data shown on income reports is updated quarterly. Data may be between three and six months old at the time reports are generated.

SFHA Policy

The PHA will obtain income reports for annual reexaminations on a monthly basis. Reports will be generated as part of the regular reexamination process.

Income reports will be compared to family-provided information as part of the annual reexamination process. Income reports may be used in the calculation of annual income, as described in Chapter 6.I.C. Income reports may also be used to meet the regulatory requirement for third party verification, as described above. Policies for resolving discrepancies between income reports and family-provided information will be resolved as described in Chapter 6.I.C. and in this chapter.

Income reports will be used in interim reexaminations to identify any discrepancies between reported income and income shown in the EIV system, and as necessary to verify and calculate earned income, unemployment benefits, Social Security and/or SSI benefits. EIV will also be used to verify that families claiming zero income are not receiving income from any of these sources.

Income reports will be retained in resident files with the applicable annual or interim reexamination documents.

When the PHA determines through income reports and third-party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 15, Program Integrity.

EIV Discrepancy Reports

The EIV discrepancy report is a tool for identifying families that may have concealed or underreported income. Data in the discrepancy report represents income for past reporting periods and may be between 6 and 30 months old at the time reports are generated.

Families that have not concealed or underreported income may appear on the discrepancy report in some circumstances, such as loss of a job or addition of new family members.

Income discrepancies may be identified through use of the EIV “Income Discrepancy Report” or by review of the discrepancy tab for the individual family.

SFHA Policy

The PHA will generate the Income Discrepancy Report at least once every 6 months.

When the PHA determines that a resident appearing on the Income Discrepancy Report has not concealed or underreported income, the resident’s name will be placed on a list of “false positive” reviews. To avoid multiple reviews in this situation, residents appearing on this list will be eliminated from discrepancy processing until a subsequent interim or annual reexamination has been completed.

The PHA will review the EIV discrepancy tab during processing of annual and interim reexaminations.

When it appears that a family may have concealed or underreported income, the PHA will request independent written third-party verification of the income in question.

When the PHA determines through file review and independent third-party verification that a family has concealed or underreported income, corrective action will be taken pursuant to the policies in Chapter 15, Program Integrity.

EIV Identity Verification

The EIV system verifies resident identities against Social Security Administration (SSA) records. These records are compared to Public and Indian Housing Information Center (PIC) data for a match on social security number, name, and date of birth.

PHAs are required to use EIV’s *Identity Verification Report* on a monthly basis to improve the availability of income information in EIV [Notice PIH 2012-10].

When identity verification for a resident fails, a message will be displayed within the EIV system and no income information will be displayed.

SFHA Policy

The PHA will identify residents whose identity verification has failed by reviewing EIV’s *Identity Verification Report* on a monthly basis. The PHA will attempt to resolve PIC/SSA discrepancies by obtaining appropriate documentation from the tenant. When the PHA determines that discrepancies exist as a result of PHA errors, such as spelling errors or incorrect birth dates, it will correct the errors promptly.

Upfront Income Verification Using Non-HUD Systems (Optional)

In addition to mandatory use of the EIV system, HUD encourages PHAs to utilize other upfront verification sources.

SFHA Policy

The PHA will inform all applicants and residents of its use of the following UIV resources during the admission and reexamination process:

HUD's EIV system

7-I.D. THIRD-PARTY WRITTEN AND ORAL VERIFICATION

HUD's current verification hierarchy defines two types of written third-party verification. The more preferable form, "written third-party verification," consists of an original document generated by a third-party source, which may be received directly from a third-party source or provided to the PHA by the family. If written third-party verification is not available, the PHA must attempt to obtain a "written third-party verification form." This is a standardized form used to collect information from a third party.

Written Third-Party Verification [Notice PIH 2010-19]

Written third-party verification documents must be original and authentic and may be supplied by the family or received from a third-party source.

Examples of acceptable tenant-provided documents include, but are not limited to: pay stubs, payroll summary reports, employer notice or letters of hire and termination, SSA benefit verification letters, bank statements, child support payment stubs, welfare benefit letters and/or printouts, and unemployment monetary benefit notices.

The PHA is required to obtain, at minimum, two current and consecutive pay stubs for determining annual income from wages.

The PHA may reject documentation provided by the family if the document is not an original, if the document appears to be forged, or if the document is altered, mutilated, or illegible.

SFHA Policy

Third-party documents provided by the family must be dated within 90 days of the PHA request date.

If the PHA determines that third-party documents provided by the family are not acceptable, the PHA will explain the reason to the family and request additional documentation.

As verification of earned income, the PHA will request pay stubs covering the 90-day period prior to the PHA's request.

Written Third-Party Verification Form

When upfront verification is not available and the family is unable to provide written third-party documents, the PHA must request a written third-party verification form. HUD's position is that this traditional third-party verification method presents administrative burdens and risks which may be reduced through the use of family-provided third-party documents.

A written third-party verification form is mandatory when there is an unreported source of income or a substantial difference in reported income (\$2400 annually or more) and there is no UIV or tenant-provided documentation to support the income discrepancy.

PHAs may mail, fax, or e-mail third-party written verification form requests to third-party sources.

SFHA Policy

The PHA will send third-party verification forms directly to the third party.

Third-party verification forms will be sent when third-party verification documents are unavailable or are rejected by the PHA.

Oral Third-Party Verification [Notice PIH 2010-19]

For third-party oral verification, PHAs contact sources, identified by UIV techniques or by the family, by telephone or in person.

Oral third-party verification is mandatory if neither form of written third-party verification is available.

Third-party oral verification may be used when requests for written third-party verification forms have not been returned within a reasonable time—e.g., 10 business days.

PHAs should document in the file the date and time of the telephone call or visit, the name of the person contacted, the telephone number, as well as the information confirmed.

SFHA Policy

In collecting third-party oral verification, PHA staff will record in the family's file the name and title of the person contacted, the date and time of the conversation (or attempt), the telephone number used, and the facts provided.

When any source responds verbally to the initial written request for verification the PHA will accept the verbal response as oral verification but will also request that the source complete and return any verification forms that were provided.

When Third-Party Verification is Not Required [Notice PIH 2010-19]

Third-party verification may not be available in all situations. HUD has acknowledged that it may not be cost-effective or reasonable to obtain third-party verification of income, assets, or expenses when these items would have a minimal impact on the family's total tenant payment.

SFHA Policy

If the family cannot provide original documents, the PHA will pay the service charge required to obtain third-party verification, unless it is not cost effective in which case a self-certification will be acceptable as the only means of verification. The cost of verification will not be passed on to the family.

The cost of postage and envelopes to obtain third-party verification of income, assets, and expenses is not an unreasonable cost [VG, p. 18].

Primary Documents

Third-party verification is not required when legal documents are the primary source, such as a birth certificate or other legal documentation of birth.

Imputed Assets

The PHA may accept a self-certification from the family as verification of assets disposed of for less than fair market value [HCV GB, p. 5-28].

SFHA Policy

The PHA will accept a self-certification from a family as verification of assets disposed of for less than fair market value [HCV GB, p. 5-28].

7-I.E. SELF-CERTIFICATION

Self-certification, or “tenant declaration,” is used as a last resort when the PHA is unable to obtain third-party verification.

When the PHA relies on a tenant declaration for verification of income, assets, or expenses, the family’s file must be documented to explain why third-party verification was not available.

SFHA Policy

When information cannot be verified by a third party or by review of documents, family members will be required to submit self-certifications attesting to the accuracy of the information they have provided to the PHA.

The PHA may require a family to certify that a family member does not receive a particular type of income or benefit.

The self-certification must be made in a format acceptable to the PHA and must be signed by the family member whose information or status is being verified. All self-certifications must be signed in the presence of a PHA representative or PHA notary public.

PART II

VERIFYING FAMILY INFORMATION

7-II.A. VERIFICATION OF LEGAL IDENTITY

SFHA Policy

The PHA will require families to furnish verification of legal identity for each household member.

Verification of Legal Identity for Adults	Verification of Legal Identity for Children
Certificate of birth, naturalization papers Church issued baptismal certificate Current, valid driver's license or Department of Motor Vehicle identification card U.S. military discharge (DD 214) U.S. passport Employer identification card	Certificate of birth Adoption papers Custody agreement Health and Human Services ID School records

If a document submitted by a family is illegible or otherwise questionable, more than one of these documents may be required.

If none of these documents can be provided and at the PHA's discretion, a third party who knows the person may attest to the person's identity. The certification must be provided in a format acceptable to the PHA and be signed in the presence of a PHA representative or PHA notary public.

Legal identity will be verified on an as needed basis.

7-II.B. SOCIAL SECURITY NUMBERS [24 CFR 5.216 and Notice PIH 2012-10]

The family must provide documentation of a valid social security number (SSN) for each member of the household, with the exception of individuals who do not contend eligible immigration status. Exemptions also include, existing residents who were at least 62 years of age as of January 31, 2010, and had not previously disclosed an SSN.

The PHA must accept the following documentation as acceptable evidence of the social security number:

An original SSN card issued by the Social Security Administration (SSA)

An original SSA-issued document, which contains the name and SSN of the individual

An original document issued by a federal, state, or local government agency, which contains the name and SSN of the individual.

The PHA may only reject documentation of an SSN provided by an applicant or resident if the document is not an original document, if the original document has been altered, mutilated, or is not legible, or if the document appears to be forged.

SFHA Policy

The PHA will explain to the applicant or resident the reasons the document is not acceptable and request that the individual obtain and submit acceptable documentation of the SSN to the PHA within 90 days.

When the resident requests to add a new household member who is at least 6 years of age, or who is under the age of 6 and has an SSN, the resident must provide the complete and accurate SSN assigned to each new member at the time of reexamination or recertification, in addition to the documentation required to verify it. The PHA may not add the new household member until such documentation is provided.

When a resident requests to add a new household member who is under the age of 6 and has not been assigned an SSN, the resident must provide the SSN assigned to each new child and the required documentation within 90 calendar days of the child being added to the household. A 90-day extension will be granted if the PHA determines that the resident's failure to comply was due to unforeseen circumstances and was outside of the resident's control. During the period the PHA is awaiting documentation of the SSN, the child will be counted as part of the assisted household.

SFHA Policy

The PHA will grant one additional 90-day extension if needed for reasons beyond the resident's control such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency.

Social security numbers must be verified only once during continuously-assisted occupancy.

SFHA Policy

The PHA will verify each disclosed SSN by:

Obtaining documentation from applicants and residents that is acceptable as evidence of social security numbers

Making a copy of the original documentation submitted, returning it to the individual, and retaining a copy in the file folder

Once the individual's verification status is classified as "verified," the PHA may, at its discretion, remove and destroy copies of documentation accepted as evidence of social security numbers. The retention of the EIV Summary Report or Income Report is adequate documentation of an individual's SSN

SFHA Policy

Once an individual's status is classified as "verified" in HUD's EIV system, the PHA will remove and destroy copies of documentation accepted as evidence of social security numbers.

7-II.C. DOCUMENTATION OF AGE

A birth certificate or other official record of birth is the preferred form of age verification for all family members. For elderly family members an original document that provides evidence of the receipt of social security retirement benefits is acceptable.

SFHA Policy

If an official record of birth or evidence of social security retirement benefits cannot be provided, the PHA will require the family to submit other documents that support the reported age of the family member (e.g., school records, driver's license if birth year is recorded) and to provide a self-certification.

Age must be verified only once during continuously-assisted occupancy.

7-II.D. FAMILY RELATIONSHIPS

Applicants and tenants are required to identify the relationship of each household member to the head of household. Definitions of the primary household relationships are provided in the Eligibility chapter.

SFHA Policy

Family relationships are verified only to the extent necessary to determine a family's eligibility and level of assistance. Certification by the head of household normally is sufficient verification of family relationships.

Marriage

SFHA Policy

Certification by the head of household is normally sufficient verification. If the PHA has reasonable doubts about a marital relationship, the PHA will require the family to document the marriage.

A marriage certificate generally is required to verify that a couple is married.

In the case of a common law marriage, the couple must demonstrate that they hold themselves to be married (e.g., by telling the community they are married, calling each other husband and wife, using the same last name, filing joint income tax returns).

Separation or Divorce

SFHA Policy

Certification by the head of household is normally sufficient verification. If the PHA has reasonable doubts about a separation or divorce, the PHA will require the family to document the divorce, or separation.

A certified copy of a divorce decree, signed by a court officer, is required to document that a couple is divorced.

A copy of a court-ordered maintenance or other court record is required to document a separation.

If no court document is available, documentation from a community-based agency will be accepted.

Absence of Adult MemberSFHA Policy

If an adult member who was formerly a member of the household is reported to be permanently absent, the family must provide evidence to support that the person is no longer a member of the family (e.g., documentation of another address at which the person resides such as a lease or utility bill).

Foster Children and Foster AdultsSFHA Policy

Third-party verification from the state or local government agency responsible for the placement of the individual with the family is required.

7-II.E. VERIFICATION OF STUDENT STATUSSFHA Policy

The PHA requires families to provide information about the student status of all students who are 18 years of age or older. This information will be verified only if:

The family claims full-time student status for an adult other than the head, spouse, or co head, or

The family claims a child care deduction to enable a family member to further his or her education.

7-II.F. DOCUMENTATION OF DISABILITY

The PHA must verify the existence of a disability in order to allow certain income disallowances and deductions from income. The PHA is not permitted to inquire about the nature or extent of a person's disability [24 CFR 100.202(c)]. The PHA may not inquire about a person's diagnosis or details of treatment for a disability or medical condition. If the PHA receives a verification document that provides such information, the PHA will not place this information in the tenant file. Under no circumstances will the PHA request a resident's medical record(s). For more information on health care privacy laws, see the Department of Health and Human Services' Web site at www.os.dhhs.gov.

The PHA may make the following inquiries, provided it makes them of all applicants, whether or not they are persons with disabilities [VG, p. 24]:

- Inquiry into an applicant's ability to meet the requirements of ownership or tenancy
- Inquiry to determine whether an applicant is qualified for a dwelling available only to persons with disabilities or to persons with a particular type of disability
- Inquiry to determine whether an applicant for a dwelling is qualified for a priority available to persons with disabilities or to persons with a particular type of disability
- Inquiry about whether an applicant for a dwelling is a current illegal abuser or addict of a controlled substance
- Inquiry about whether an applicant has been convicted of the illegal manufacture or distribution of a controlled substance

Family Members Receiving SSA Disability Benefits

Verification of receipt of disability benefits from the Social Security Administration (SSA) is sufficient for verification of disability for the purpose of qualification for waiting list preferences or certain income disallowances and deductions [VG, p. 23].

SFHA Policy

For family members claiming disability who receive disability payments from the SSA, the PHA will attempt to obtain information about disability benefits through HUD's Enterprise Income Verification (EIV) system. If documentation is not available through HUD's EIV system, the PHA will request a current (dated within the last 60 days) SSA benefit verification letter from each family member claiming disability status. If a family member is unable to provide the document, the PHA will ask the family to obtain a benefit verification letter either by calling SSA at 1-800-772-1213 or by requesting one from www.ssa.gov. Once the family receives the benefit verification letter, it will be required to provide the letter to the PHA.

Family Members Not Receiving SSA Disability Benefits

Receipt of veteran's disability benefits, worker's compensation, or other non-SSA benefits based on the individual's claimed disability are not sufficient verification that the individual meets HUD's definition of disability in 24 CFR 5.403, necessary to qualify for waiting list preferences or certain income disallowances and deductions.

SFHA Policy

For family members claiming disability who do not receive SSI or other disability payments from the SSA, a knowledgeable professional must provide third-party verification that the family member meets the HUD definition of disability. See the Eligibility chapter for the HUD definition of disability. The knowledgeable professional will verify whether the family member does or does not meet the HUD definition.

7-II.G. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS [24 CFR 5.508]

Overview

Housing assistance is not available to persons who are not citizens, nationals, or eligible immigrants. Prorated assistance is provided for "mixed families" containing both eligible and ineligible persons. See the Eligibility chapter for detailed discussion of eligibility requirements. This chapter (7) discusses HUD and PHA verification requirements related to citizenship status.

The family must provide a certification that identifies each family member as a U.S. citizen, a U.S. national, an eligible noncitizen or an ineligible noncitizen and submit the documents discussed below for each family member. Once eligibility to receive assistance has been verified for an individual it need not be collected or verified again during continuously-assisted occupancy [24 CFR 5.508(g)(5)]

U.S. Citizens and Nationals

HUD requires a declaration for each family member who claims to be a U.S. citizen or national. The declaration must be signed personally by any family member 18 or older and by a guardian for minors.

The PHA may request verification of the declaration by requiring presentation of a birth certificate, United States passport or other appropriate documentation.

SFHA Policy

Family members who claim U.S. citizenship or national status will not be required to provide additional documentation unless the PHA receives information indicating that an individual's declaration may not be accurate.

Eligible Immigrants

Documents Required

All family members claiming eligible immigration status must declare their status in the same manner as U.S. citizens and nationals.

The documentation required for eligible noncitizens varies depending upon factors such as the date the person entered the U.S., the conditions under which eligible immigration status has been granted, age, and the date on which the family began receiving HUD-funded assistance. Exhibit 7-1 at the end of this chapter summarizes documents family members must provide.

PHA Verification [HCV GB, pp 5-3 and 5-7]

For family members age 62 or older who claim to be eligible immigrants, proof of age is required in the manner described in 7-II.C. of this ACOP. No further verification of eligible immigration status is required.

For family members under the age of 62 who claim to be eligible immigrants, the PHA must verify immigration status with the U.S. Citizenship and Immigration Services (USCIS).

The PHA will follow all USCIS protocols for verification of eligible immigration status.

7-II.H. VERIFICATION OF PREFERENCE STATUS

The PHA must verify any preferences claimed by an applicant.

SFHA Policy

The PHA will verify the preference at the time of initial intake. If the preference is not verified at that time, the applicant will be placed back on the waitlist based on the date and time of application.

PART III

VERIFYING INCOME AND ASSETS

Chapter 6, Part I of this ACOP describes in detail the types of income that are included and excluded and how assets and income from assets are handled. Any assets and income reported by the family must be verified. This part provides PHA policies that supplement the general verification procedures specified in Part I of this chapter.

7-III.A. EARNED INCOME

Tips

SFHA Policy

Unless tip income is included in a family member's W-2 by the employer, persons who work in industries where tips are standard will be required to sign a certified estimate of tips received for the prior year and tips anticipated to be received in the coming year.

7-III.B. BUSINESS AND SELF EMPLOYMENT INCOME

SFHA Policy

Business owners and self-employed persons will be required to provide:

An audited financial statement for the previous fiscal year if an audit was conducted. If an audit was not conducted, a statement of income and expenses must be submitted and the business owner or self-employed person must certify to its accuracy.

All schedules completed for filing federal and local taxes in the preceding year.

If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules.

The PHA will provide a format for any person who is unable to provide such a statement to record income and expenses for the coming year. The business owner/self-employed person will be required to submit the information requested and to certify to its accuracy at all future reexaminations.

At any reexamination the PHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.

If a family member has been self-employed less than three (3) months, the PHA will accept the family member's certified estimate of income and schedule an interim reexamination in three (3) months. If the family member has been self-employed for three (3) to twelve (12) months the PHA will require the family to provide documentation of income and expenses for this period and use that information to project income.

7-III.C. PERIODIC PAYMENTS AND PAYMENTS IN LIEU OF EARNINGS

Social Security/SSI Benefits

SFHA Policy

To verify the SS/SSI benefits of applicants, the PHA will request a current (dated within the last 60 days) SSA benefit verification letter from each family member who receives social security benefits. If a family member is unable to provide the document, the PHA will help the applicant request a benefit verification letter from SSA's Web site at www.socialsecurity.gov or ask the family to request one by calling SSA at 1-800-772-1213. Once the family has received the original benefit verification letter, it will be required to provide the letter to the PHA.

To verify the SS/SSI benefits of residents, the PHA will obtain information about social security/SSI benefits through HUD's EIV system, and confirm with the resident(s) that the current listed benefit amount is correct. If the resident disputes the EIV-reported benefit amount, or if benefit information is not available in HUD systems, the PHA will request a current SSA benefit verification letter from each family member that receives social security benefits. If a family member is unable to provide the document, the PHA will help the resident request a benefit verification letter from SSA's Web site at www.socialsecurity.gov or ask the family to request one by calling SSA at 1-800-772-1213. Once the family has received the benefit verification letter, it will be required to provide the letter to the PHA.

7-III.D. ALIMONY OR CHILD SUPPORT

SFHA Policy

The way the PHA will seek verification for alimony and child support differs depending on whether the family declares that it receives regular payments.

If the family declares that it *receives regular payments*, verification will be sought in the following order.

Copy of the receipts and/or payment stubs for the 60 days prior to PHA request

Third-party verification form from the state or local child support enforcement agency

Third-party verification form from the person paying the support

Family's self-certification of amount received and of the likelihood of support payments being received in the future, or that support payments are not being received

If the family declares that it *receives irregular or no payments*.

7-III.E. ASSETS AND INCOME FROM ASSETS

Assets Disposed of for Less than Fair Market Value

The family must certify whether any assets have been disposed of for less than fair market value in the preceding two years. The PHA needs to verify only those certifications that warrant documentation [HCV GB, p. 5-28].

SFHA Policy

The PHA will verify the value of assets disposed of only if:

The PHA does not already have a reasonable estimation of its value from previously collected information, or

The amount reported by the family in the certification appears obviously in error.

Example 1: An elderly resident reported a \$10,000 certificate of deposit at the last annual reexamination and the PHA verified this amount. Now the person reports that she has given this \$10,000 to her son. The PHA has a reasonable estimate of the value of the asset; therefore, reverification of the value of the asset is not necessary.

Example 2: A family member has disposed of its 1/4 share of real property located in a desirable area and has valued her share at approximately 5,000. Based upon market conditions, this declaration does not seem realistic. Therefore, the PHA will verify the value of this asset.

7-III.F. NET INCOME FROM RENTAL PROPERTY

SFHA Policy

The family must provide:

A current executed lease for the property that shows the rental amount or certification from the current tenant

A self-certification from the family members engaged in the rental of property providing an estimate of expenses for the coming year and the most recent IRS Form 1040 with Schedule E (Rental Income). If schedule E was not prepared, the PHA will require the family members involved in the rental of property to provide a self-certification of income and expenses for the previous year and may request documentation to support the statement including: tax statements, insurance invoices, bills for reasonable maintenance and utilities, and bank statements or amortization schedules showing monthly interest expense.

7-III.G. RETIREMENT ACCOUNTS

SFHA Policy

The PHA will accept written third-party documents supplied by the family as evidence of the status of retirement accounts.

The type of original document that will be accepted depends upon the family member's retirement status.

Before retirement, the PHA will accept an original document from the entity holding the account with a date that shows it is the most recently scheduled statement for the account but in no case earlier than 6 months from the effective date of the examination.

Upon retirement, the PHA will accept an original document from the entity holding the account that reflects any distributions of the account balance, any lump sums taken and any regular payments.

After retirement, the PHA will accept an original document from the entity holding the account dated no earlier than 12 months before that reflects any distributions of the account balance, any lump sums taken and any regular payments.

7-III.H. INCOME FROM EXCLUDED SOURCES

A detailed discussion of excluded income is provided in Chapter 6, Part I.

The PHA must obtain verification for income exclusions only if, without verification, the PHA would not be able to determine whether the income is to be excluded. For example: If a family's 16 year old has a job at a fast food restaurant, the PHA will confirm that PHA records verify the child's age but will not require third-party verification of the amount earned. However, if a family claims the earned income disallowance for a source of income, both the source and the income must be verified.

SFHA Policy

The PHA will reconcile differences in amounts reported by the third party and the family only when the excluded amount is used to calculate the family's rent (as is the case with the earned income disallowance). In all other cases, the PHA will report the amount to be excluded as indicated on documents provided by the family.

7-III.I. ZERO ANNUAL INCOME STATUS

SFHA Policy

The PHA will check UIV sources and/or request information from third-party sources to verify that certain forms of income such as unemployment benefits, TANF, SSI, etc. are not being received by families claiming to have zero annual income.

PART IV

VERIFYING MANDATORY DEDUCTIONS

7-IV.A. DEPENDENT AND ELDERLY/DISABLED HOUSEHOLD DEDUCTIONS

The dependent and elderly/disabled family deductions require only that the PHA verify that the family members identified as dependents or elderly/disabled persons meet the statutory definitions. No further verifications are required.

Dependent Deduction

See Chapter 6 (6-II.B.) for a full discussion of this deduction. The PHA will verify that:

- Any person under the age of 18 for whom the dependent deduction is claimed is not the head, spouse or co head of the family and is not a foster child
- Any person age 18 or older for whom the dependent deduction is claimed is not a foster adult or live-in aide, and is a person with a disability or a full time student

Elderly/Disabled Family Deduction

See the Eligibility chapter for a definition of elderly and disabled families and Chapter 6 (6-II.C.) for a discussion of the deduction. The PHA will verify that the head, spouse, or co head is 62 years of age or older or a person with disabilities.

7-IV.B. MEDICAL EXPENSE DEDUCTION

Policies related to medical expenses are found in 6-II.D. The amount of the deduction will be verified following the standard verification procedures described in Part I.

Amount of Expense

SFHA Policy

Medical expenses will be verified through:

Written third-party documents provided by the family, such as pharmacy printouts or receipts.

The PHA will make a best effort to determine what expenses from the past are likely to continue to occur in the future. The PHA will also accept evidence of monthly payments or total payments that will be due for medical expenses during the upcoming 12 months.

Written third-party verification forms, if the family is unable to provide acceptable documentation.

If third-party or document review is not possible, written family certification as to costs anticipated to be incurred during the upcoming 12 months.

In addition, the PHA must verify that:

- The household is eligible for the deduction.
- The costs to be deducted are qualified medical expenses.
- The expenses are not paid for or reimbursed by any other source.
- Costs incurred in past years are counted only once.

Eligible Household

The medical expense deduction is permitted only for households in which the head, spouse, or co head is at least 62 or a person with disabilities. The PHA will verify that the family meets the definition of an elderly or disabled family provided in the Eligibility chapter, and as described in Chapter 7 (7-IV.A) of this plan.

Qualified Expenses

To be eligible for the medical expenses deduction, the costs must qualify as medical expenses. See Chapter 6 (6-II.D.) for the PHA's policy on what counts as a medical expense.

Unreimbursed Expenses

To be eligible for the medical expenses deduction, the costs must not be reimbursed by another source.

SFHA Policy

The family will be required to certify that the medical expenses are not paid or reimbursed to the family from any source.

Expenses Incurred in Past YearsSFHA Policy

When anticipated costs are related to on-going payment of medical bills incurred in past years, the PHA will verify:

The anticipated repayment schedule

The amounts paid in the past, and

Whether the amounts to be repaid have been deducted from the family's annual income in past years

7-IV.C. DISABILITY ASSISTANCE EXPENSES

Policies related to disability assistance expenses are found in 6-II.E. The amount of the deduction will be verified following the standard verification procedures described in Part I.

Amount of Expense

Attendant Care

SFHA Policy

The PHA will accept written third-party documents provided by the family.

If family-provided documents are not available, the PHA will provide a third-party verification form directly to the care provider requesting the needed information.

Expenses for attendant care will be verified through:

Written third-party documents provided by the family, such as receipts or cancelled checks.

Third-party verification form signed by the provider, if family-provided documents are not available.

If third-party verification is not possible, written family certification as to costs anticipated to be incurred for the upcoming 12 months.

Auxiliary Apparatus

SFHA Policy

Expenses for auxiliary apparatus will be verified through:

Written third-party documents provided by the family, such as billing statements for purchase of auxiliary apparatus, or other evidence of monthly payments or total payments that will be due for the apparatus during the upcoming 12 months.

Third-party verification form signed by the provider, if family-provided documents are not available.

If third-party or document review is not possible, written family certification of estimated apparatus costs for the upcoming 12 months.

In addition, the PHA must verify that:

- The family member for whom the expense is incurred is a person with disabilities (as described in 7-II.F above).
- The expense permits a family member, or members, to work (as described in 6-II.E.).
- The expense is not reimbursed from another source (as described in 6-II.E.).

Family Member is a Person with Disabilities

To be eligible for the disability assistance expense deduction, the costs must be incurred for attendant care or auxiliary apparatus expense associated with a person with disabilities. The PHA will verify that the expense is incurred for a person with disabilities (See 7-II.F.).

Family Member(s) Permitted to Work

The PHA must verify that the expenses claimed actually enable a family member, or members, (including the person with disabilities) to work.

SFHA Policy

The PHA will request third-party verification from a rehabilitation agency or knowledgeable medical professional indicating that the person with disabilities requires attendant care or an auxiliary apparatus to be employed, or that the attendant care or auxiliary apparatus enables another family member, or members, to work (See 6-II.E.). This documentation may be provided by the family.

If third-party verification has been attempted and is either unavailable or proves unsuccessful, the family must certify that the disability assistance expense frees a family member, or members (possibly including the family member receiving the assistance), to work.

Unreimbursed Expenses

To be eligible for the disability expenses deduction, the costs must not be reimbursed by another source.

SFHA Policy

The family will be required to certify that attendant care or auxiliary apparatus expenses are not paid by or reimbursed to the family from any source.

7-IV.D. CHILD CARE EXPENSES

Policies related to child care expenses are found in Chapter 6 (6-II.F). The amount of the deduction will be verified following the standard verification procedures described in Part I. In addition, the PHA must verify that:

- The child is eligible for care.
- The costs claimed are not reimbursed.
- The costs enable a family member to pursue an eligible activity.
- The costs are for an allowable type of child care.
- The costs are reasonable.

Eligible Child

To be eligible for the child care deduction, the costs must be incurred for the care of a child under the age of 13. The PHA will verify that the child being cared for (including foster children) is under the age of 13 (See 7-II.C.).

Unreimbursed Expense

To be eligible for the child care deduction, the costs must not be reimbursed by another source.

SFHA Policy

The family will be required to certify that the child care expenses are not paid by or reimbursed to the family from any source.

Pursuing an Eligible Activity

The PHA must verify that the family member(s) that the family has identified as being enabled to seek work, pursue education, or be gainfully employed, are actually pursuing those activities.

SFHA Policy

Information to be Gathered

The PHA will verify information about how the schedule for the claimed activity relates to the hours of care provided, the time required for transportation, the time required for study (for students), the relationship of the family member(s) to the child, and any special needs of the child that might help determine which family member is enabled to pursue an eligible activity.

Seeking Work

Whenever possible the PHA will use documentation from a state or local agency that monitors work-related requirements (e.g., welfare or unemployment). In such cases the PHA will request family-provided verification from the agency of the member's job seeking efforts to date and require the family to submit to the PHA any reports provided to the other agency.

In the event third-party verification is not available, the PHA will provide the family with a form on which the family member must record job search efforts. The PHA will review this information at each subsequent reexamination for which this deduction is claimed.

Furthering Education

The PHA will request third-party documentation to verify that the person permitted to further his or her education by the child care is enrolled and provide information about the timing of classes for which the person is registered. The documentation may be provided by the family.

Gainful Employment

The PHA will seek third-party verification of the work schedule of the person who is permitted to work by the child care. In cases in which two or more family members could be permitted to work, the work schedules for all relevant family members may be verified. The documentation may be provided by the family.

Allowable Type of Child Care

The type of care to be provided is determined by the family, but must fall within certain guidelines, as discussed in Chapter 6.

SFHA Policy

The PHA will verify that the type of child care selected by the family is allowable, as described in Chapter 6 (6-II.F).

The PHA will verify that the fees paid to the child care provider cover only child care costs (e.g., no housekeeping services or personal services) and are paid only for the care of an eligible child (e.g., prorate costs if some of the care is provided for ineligible family members).

The PHA will verify that the child care provider is not an assisted family member. Verification will be made through the head of household's declaration of family members who are expected to reside in the unit.

Reasonableness of Expenses

Only reasonable child care costs can be deducted.

SFHA Policy

The actual costs the family incurs will be compared with the PHA's established standards of reasonableness for the type of care in the locality to ensure that the costs are reasonable.

If the family presents a justification for costs that exceed typical costs in the area, the PHA will request additional documentation, as required, to support a determination that the higher cost is appropriate.

Exhibit 7-1: Summary of Documentation Requirements for Noncitizens
[HCV GB, pp. 5-9 and 5-10)

- All noncitizens claiming eligible status must sign a declaration of eligible immigrant status on a form acceptable to the PHA.
- Except for persons 62 or older, all noncitizens must sign a verification consent form
- Additional documents are required based upon the person's status.

Elderly Noncitizens

- A person 62 years of age or older who claims eligible immigration status also must provide proof of age such as birth certificate, passport, or documents showing receipt of SS old-age benefits.

All other Noncitizens

- Noncitizens that claim eligible immigration status also must present the applicable USCIS document. Acceptable USCIS documents are listed below.

- | | |
|--|--|
| <ul style="list-style-type: none"> • Form I-551 Alien Registration Receipt Card (for permanent resident aliens) • Form I-94 Arrival-Departure Record annotated with one of the following: <ul style="list-style-type: none"> • “Admitted as a Refugee Pursuant to Section 207” • “Section 208” or “Asylum” • “Section 243(h)” or “Deportation stayed by Attorney General” • “Paroled Pursuant to Section 221 (d)(5) of the USCIS” | <ul style="list-style-type: none"> • Form I-94 Arrival-Departure Record with no annotation accompanied by: <ul style="list-style-type: none"> • A final court decision granting asylum (but only if no appeal is taken); • A letter from a USCIS asylum officer granting asylum (if application is filed on or after 10/1/90) or from a USCIS district director granting asylum (application filed before 10/1/90); • A court decision granting withholding of deportation; or • A letter from an asylum officer granting withholding or deportation (if application filed on or after 10/1/90). |
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| <ul style="list-style-type: none"> • Form I-688 Temporary Resident Card annotated “Section 245A” or Section 210”. | <ul style="list-style-type: none"> • Form I-688B Employment Authorization Card annotated “Provision of Law 274a. 12(11)” or “Provision of Law 274a.12”. |
|--|--|

- A receipt issued by the USCIS indicating that an application for issuance of a replacement document in one of the above listed categories has been made and the applicant’s entitlement to the document has been verified; or
- Other acceptable evidence. If other documents are determined by the USCIS to constitute acceptable evidence of eligible immigration status, they will be announced by notice published in the *Federal Register*

Chapter 8

LEASING AND INSPECTIONS

[24 CFR 5, Subpart G; 24 CFR 966, Subpart A]

INTRODUCTION

Public housing leases are the basis of the legal relationship between the PHA and the tenant. All units must be occupied pursuant to a dwelling lease agreement that complies with HUD's regulations.

HUD rules also require the PHA to inspect each dwelling unit prior to move-in, at move-out, and annually during occupancy. In addition, the PHA may require additional inspections in accordance with PHA policy.

This chapter is divided into two parts as follows:

Part I: Leasing. This part describes pre-leasing activities and the PHA's policies pertaining to lease execution, modification, and payments under the lease.

Part II: Inspections. This part describes the PHA's policies for inspecting dwelling units.

PART I
LEASING

8-I.A. OVERVIEW

An eligible family may occupy a public housing dwelling unit under the terms of a lease. The lease must meet all regulatory requirements, and must also comply with applicable state and local laws and codes.

The term of the lease must be for a period of 12 months. The lease must be renewed automatically for another 12-month term, except that the PHA may not renew the lease if the family has violated the community service requirement [24 CFR 966.4(a)(2)].

Part I of this chapter contains regulatory information, when applicable, as well as the PHA's policies governing leasing issues.

8-I.B. LEASE ORIENTATION

SFHA Policy

After unit acceptance but prior to occupancy, a PHA representative will provide a lease orientation to the family. The head of household or spouse is required to attend.

Orientation Agenda

SFHA Policy

When families attend the lease orientation, they will be provided with:

- A copy of the lease
- A copy of the PHA's grievance procedure
- A copy of the house rules
- A copy of the PHA's schedule of maintenance charges
- A copy of the pamphlet *Protect Your Family From Lead in Your Home*
- A copy of "Is Fraud Worth It?" (form HUD-1141-OIG), which explains the types of actions a family must avoid and the penalties for program abuse
- A copy of "What You Should Know about EIV," a guide to the Enterprise Income Verification (EIV) system published by HUD as an attachment to Notice PIH 2010-19

Topics to be discussed will include:

- Applicable deposits and other charges
- Review and explanation of lease provisions
- Unit maintenance and work orders
- The PHA's reporting requirements
- Explanation of occupancy forms
- Community service requirements
- Family choice of rent

8-I.C. EXECUTION OF LEASE

The lease must be executed by the tenant and the PHA, except for automatic renewals of a lease [24 CFR 966.4(a)(3)].

A lease is executed at the time of admission for all new residents. A new lease is also executed at the time of transfer from one PHA unit to another.

The lease must state the composition of the household as approved by the PHA (family members and any PHA-approved live-in aide) [24 CFR 966.4(a)(1)(v)]. See Section 8-I.D. for policies regarding changes in family composition during the lease term.

SFHA Policy

The head of household, spouse or co head, and all other adult members of the household will be required to sign the public housing lease prior to admission. An appointment will be scheduled for the parties to execute the lease. The head of household will be provided a copy of the executed lease and the PHA will retain a copy in the resident's file.

Files for households that include a live-in aide will contain file documentation signed by the live-in aide, that the live-in aide is not a party to the lease and is not entitled to PHA assistance. The live-in aide is only approved to live in the unit while serving as the attendant for the participant family member.

8-I.D. MODIFICATIONS TO THE LEASE

The lease may be modified at any time by written agreement of the tenant and the PHA [24 CFR 966.4(a)(3)].

Modifications to the Lease

The PHA may modify its lease from time to time. However, the PHA must give residents 30 days advance notice of the proposed changes and an opportunity to comment on the changes. The PHA must also consider any comments before formally adopting the new lease [24 CFR 966.3].

After proposed changes have been incorporated into the lease and approved by the Board, each family must be notified at least 60 days in advance of the effective date of the new lease or lease revision. A resident's refusal to accept permissible and reasonable lease modifications that are made in accordance with HUD requirements, or are required by HUD, is grounds for termination of tenancy [24 CFR 966.4(l)(2)(iii)(E)].

SFHA Policy

The family will have 30 days to accept the revised lease. If the family does not accept the offer of the revised lease within that 30 day timeframe, the family's tenancy will be terminated for other good cause in accordance with the policies in Chapter 13.

Schedules of special charges and rules and regulations are subject to modification or revision. Because these schedules are incorporated into the lease by reference, residents and resident organizations must be provided at least thirty days written notice of the reason(s) for any proposed modifications or revisions, and must be given an opportunity to present written comments. The notice must be delivered directly or mailed to each tenant; or posted in at least three conspicuous places within each structure or building in which the affected dwelling units are located, as well as in a conspicuous place at the project office, if any, or if none, a similar central business location within the project. Comments must be taken into consideration before any proposed modifications or revisions become effective [24 CFR 966.5].

After the proposed revisions become effective they must be publicly posted in a conspicuous manner in the project office and must be furnished to applicants and tenants on request [24 CFR 966.5].

SFHA Policy

When the PHA proposes to modify or revise schedules of special charges or rules and regulations, the PHA will post a copy of the notice in the central office, and will mail a copy of the notice to each resident family. Documentation of proper notice will be included in each resident file.

Other ModificationsSFHA Policy

The lease will be amended to reflect all changes in family composition.

If, for any reason, any member of the household ceases to reside in the unit, the lease will be amended by drawing a line through the person's name. The head of household and PHA will be required to initial and date the change.

If a new household member is approved by the PHA to reside in the unit, the person's name and birth date will be added to the lease. The head of household and PHA will be required to initial and date the change. If the new member of the household is an adult, s/he will also be required to sign and date the lease.

Policies governing when and how changes in family composition must be reported are contained in Chapter 9, Reexaminations.

8-I.E. SECURITY DEPOSITS [24 CFR 966.4(b)(5)]

At the option of the PHA, the lease may require security deposits. The amount of the security deposit cannot exceed one month's rent or a reasonable fixed amount as determined by the PHA. The PHA may allow for gradual accumulation of the security deposit by the family, or the family may be required to pay the security deposit in full prior to occupancy. Subject to applicable laws, interest earned on security deposits may be refunded to the tenant after vacating the unit, or used for tenant services or activities.

SFHA Policy

Residents must pay a security deposit to the PHA at the time of admission. The amount of the security deposit will be the greater of \$100 or an amount equal to the family's total tenant payment at the time of move-in, and must be paid in full prior to occupancy. In situations of financial hardship, the resident and the PHA may enter into an agreement to pay the security deposit in installment payments until the deposit is paid in full.

The PHA will hold the security deposit for the period the family occupies the unit. The PHA will not use the security deposit for rent or other charges while the resident is living in the unit.

Within 21 calendar days of move-out, the PHA will refund to the resident the amount of the security deposit (including interest earned on the security deposit), less any amount needed to pay the cost of unpaid rent, damages listed on the move-out inspection report that exceed normal wear and tear, and other charges due under the lease.

The PHA will provide the resident with a written list of any charges against the security deposit within 10 business days of the move-out inspection. If the resident disagrees with the amount charged, the PHA will provide a meeting to discuss the charges.

If the resident transfers to another unit, the PHA will transfer the security deposit to the new unit. The tenant will be billed for any maintenance or other charges due for the "old" unit.

8-I.F. PAYMENTS UNDER THE LEASE

Rent Payments [24 CFR 966.4(b)(1)]

Families must pay the amount of the monthly tenant rent determined by the PHA in accordance with HUD regulations and other requirements. The amount of the tenant rent is subject to change in accordance with HUD requirements.

The lease must specify the initial amount of the tenant rent at the beginning of the initial lease term, and the PHA must give written notice stating any change in the amount of tenant rent and when the change is effective.

SFHA Policy

The tenant rent is due and payable at the PHA-designated location on the first of every month. If the first falls on a weekend or holiday, the rent is due and payable on the first business day thereafter.

If a family's tenant rent changes, the PHA will notify the family of the new amount and the effective date by sending a "Notice of Rent Adjustment" which will become an attachment to the lease.

Late Fees, Repayment Agreements and Nonpayment

At the option of the PHA, the lease may provide for payment of penalties when the family is late in paying tenant rent [24 CFR 966.4(b)(3)].

The lease must provide that late payment fees are not due and collectible until two weeks after the PHA gives written notice of the charges. The written notice is considered an adverse action, and must meet the requirements governing a notice of adverse action [24 CFR 966.4(b)(4)].

The notice of proposed adverse action must identify the specific grounds for the action and inform the family of their right for a hearing under the PHA grievance procedures. The PHA must not take the proposed action until the time for the tenant to request a grievance hearing has expired, or (if a hearing was requested within the required timeframe,) the grievance process has been completed [24 CFR 966.4(e)(8)].

SFHA Policy

If the family fails to pay their rent by the fifth day of the month, a 14 day Notice to Vacate will be issued to the resident for failure to pay rent, demanding payment in full or the surrender of the premises.

In addition, if the resident fails to make payment by the end of office hours on the fifth day of the month, a late fee of \$25.00 will be charged. Notices of late fees will be in accordance with requirements regarding notices of adverse action. Charges are due and payable 14 calendar days after billing.

If the family requests a grievance hearing within the required timeframe, the PHA may not take action for nonpayment of the fee until the conclusion of the grievance process. If the resident can document financial hardship, the late fee may be waived on a case-by-case basis.

When a check is returned for insufficient funds or is written on a closed account, the rent will be considered unpaid and a returned check fee of \$25.00 will be charged to the family. The fee will be due and payable 14 days after billing.

Excess Utility Charges

If the PHA charges the tenant for consumption of excess utilities, the lease must state the basis for the determination of such charges. The imposition of charges for consumption of excess utilities is permissible only if the charges are determined by an individual check meter servicing the leased unit or result from the use of major tenant-supplied appliances [24 CFR 966.4(b)(2)].

Schedules of special charges for utilities that are required to be incorporated in the lease by reference must be publicly posted in a conspicuous manner in the development office and must be furnished to applicants and tenants on request [24 CFR 966.5].

The lease must provide that charges for excess utility consumption are not due and collectible until two weeks after the PHA gives written notice of the charges. The written notice is considered an adverse action, and must meet the requirements governing a notice of adverse action [24 CFR 966.4(b)(4)].

The notice of proposed adverse action must identify the specific grounds for the action and inform the family of their right for a hearing under the PHA grievance procedures. The PHA must not take the proposed action until the time for the tenant to request a grievance hearing has expired, or (if a hearing was requested within the required timeframe,) the grievance process has been completed [24 CFR 966.4(e)(8)].

SFHA Policy

When applicable, families will be charged for excess utility usage according to the PHA's current posted schedule. Notices of excess utility charges will be mailed monthly and will be in accordance with requirements regarding notices of adverse actions. Charges are due and payable 14 calendar days after billing. If the family requests a grievance hearing within the required timeframe, the PHA may not take action for nonpayment of the charges until the conclusion of the grievance process.

Nonpayment of excess utility charges is a violation of the lease and is grounds for eviction.

Maintenance and Damage Charges

If the PHA charges the tenant for maintenance and repair beyond normal wear and tear, the lease must state the basis for the determination of such charges [24 CFR 966.4(b)(2)].

Schedules of special charges for services and repairs which are required to be incorporated in the lease by reference must be publicly posted in a conspicuous manner in the development office and must be furnished to applicants and tenants on request [24 CFR 966.5].

The lease must provide that charges for maintenance and repair beyond normal wear and tear are not due and collectible until two weeks after the PHA gives written notice of the charges. The written notice is considered an adverse action, and must meet the requirements governing a notice of adverse action [24 CFR 966.4(b)(4)].

The notice of proposed adverse action must identify the specific grounds for the action and inform the family of their right for a hearing under the PHA grievance procedures. The PHA must not take the proposed action until the time for the tenant to request a grievance hearing has expired, or (if a hearing was requested within the required timeframe,) the grievance process has been completed [24 CFR 966.4(e)(8)].

SFHA Policy

When applicable, families will be charged for maintenance and/or damages according to the PHA's current schedule. Work that is not covered in the schedule will be charged based on the actual cost of labor and materials to make needed repairs (including overtime, if applicable).

Notices of maintenance and damage charges will be mailed monthly and will be in accordance with requirements regarding notices of adverse actions. Charges are due and payable 14 calendar days after billing. If the family requests a grievance hearing within the required timeframe, the PHA may not take action for nonpayment of the charges until the conclusion of the grievance process.

Nonpayment of maintenance and damage charges is a violation of the lease and is grounds for eviction.

PART II

INSPECTIONS

8-II.A. OVERVIEW

HUD rules require the PHA to inspect each dwelling unit prior to move-in, at move-out, and annually during occupancy. In addition, the PHA may require additional inspections, in accordance with PHA Policy. This part contains the PHA's policies governing inspections, notification of unit entry, and inspection results.

8-II.B. TYPES OF INSPECTIONS

Move-In Inspections [24 CFR 966.4(i)]

The lease must require the PHA and the family to inspect the dwelling unit prior to occupancy in order to determine the condition of the unit and equipment in the unit. A copy of the initial inspection, signed by the PHA and the resident, must be provided to the tenant and be kept in the resident file.

SFHA Policy

Any adult family member may attend the initial inspection and sign the inspection form for the head of household.

Move-Out Inspections [24 CFR 966.4(i)]

The PHA must inspect the unit at the time the resident vacates the unit and must allow the resident to participate in the inspection if he or she wishes, unless the tenant vacates without notice to the PHA. The PHA must provide to the tenant a statement of any charges to be made for maintenance and damage beyond normal wear and tear.

The difference between the condition of the unit at move-in and move-out establishes the basis for any charges against the security deposit so long as the work needed exceeds that for normal wear and tear.

SFHA Policy

When applicable, the PHA will provide the tenant with a statement of charges to be made for maintenance and damage beyond normal wear and tear, within 10 business days of conducting the move-out inspection.

Annual Inspections

Under the Public Housing Assessment System (PHAS), the PHA is required to inspect all occupied units annually using HUD's Uniform Physical Condition Standards (UPCS) [24 CFR 902.43(a)(4)].

Quality Control Inspections

The purpose of quality control inspections is to assure that all defects were identified in the original inspection, and that repairs were completed at an acceptable level of craftsmanship and within an acceptable time frame

SFHA Policy

Supervisory quality control inspections will be conducted in accordance with the PHA's maintenance plan.

Special InspectionsSFHA Policy

PHA staff may conduct a special inspection for any of the following reasons:

Housekeeping

Unit condition

Suspected lease violation

Preventive maintenance

Routine maintenance

There is reasonable cause to believe an emergency exists

Other InspectionsSFHA Policy

Building exteriors, grounds, common areas and systems will be inspected according to the PHA's maintenance plan.

8-II.C. NOTICE AND SCHEDULING OF INSPECTIONS

Notice of Entry

Non-emergency Entries [24 CFR 966.4(j)(1)]

The PHA may enter the unit, with reasonable advance notification to perform routine inspections and maintenance, make improvements and repairs, or to show the unit for re-leasing. A written statement specifying the purpose of the PHA entry delivered to the dwelling unit at least two days before such entry is considered reasonable advance notification.

SFHA Policy

The PHA will notify the resident in writing at least 48 hours prior to any non-emergency inspection.

For regular annual inspections, the family will receive at least 2 weeks written notice of the inspection to allow the family to prepare the unit for the inspection.

Entry for repairs requested by the family will not require prior notice. Resident-requested repairs presume permission for the PHA to enter the unit.

Emergency Entries [24 CFR 966.4(j)(2)]

The PHA may enter the dwelling unit at any time without advance notice when there is reasonable cause to believe that an emergency exists. If no adult household member is present at the time of an emergency entry, the PHA must leave a written statement showing the date, time and purpose of the entry prior to leaving the dwelling unit.

Scheduling of Inspections

SFHA Policy

Inspections will be conducted during business hours. If a family needs to reschedule an inspection, they must notify the PHA at least 24 hours prior to the scheduled inspection. The PHA will reschedule the inspection no more than once unless the resident has a verifiable good cause to delay the inspection. The PHA may request verification of such cause.

Attendance at Inspections

Residents are required to be present for move-in inspections [24 CFR 966.4(i)]. There is no such requirement for other types of inspections.

SFHA Policy

Except at move-in inspections, the resident is not required to be present for the inspection. The resident may attend the inspection if he or she wishes.

If no one is at home, the inspector will enter the unit, conduct the inspection and leave a copy of the inspection report in the unit.

8-II.D. INSPECTION RESULTS

The PHA is obligated to maintain dwelling units and the project in decent, safe and sanitary condition and to make necessary repairs to dwelling units [24 CFR 966.4(e)].

Emergency Repairs [24 CFR 966.4(h)]

If the unit is damaged to the extent that conditions are created which are hazardous to the life, health, or safety of the occupants, the tenant must immediately notify the PHA of the damage, and the PHA must make repairs within a reasonable time frame.

If the damage was caused by a household member or guest, the PHA must charge the family for the reasonable cost of repairs. The PHA may also take lease enforcement action against the family.

If the PHA cannot make repairs quickly, the PHA must offer the family standard alternative accommodations. If the PHA can neither repair the defect within a reasonable time frame nor offer alternative housing, rent shall be abated in proportion to the seriousness of the damage and loss in value as a dwelling. Rent shall not be abated if the damage was caused by a household member or guest, or if the resident rejects the alternative accommodations.

SFHA Policy

When conditions in the unit are hazardous to life, health, or safety, the PHA will make repairs or otherwise abate the situation within 24 hours.

Defects hazardous to life, health or safety include, but are not limited to, the following:

- Any condition that jeopardizes the security of the unit

- Major plumbing leaks or flooding, waterlogged ceiling or floor in imminent danger of falling

- Natural or LP gas or fuel oil leaks

- Any electrical problem or condition that could result in shock or fire

- Absence of a working heating system when outside temperature is below 60 degrees Fahrenheit

- Utilities not in service, including no running hot water

- Conditions that present the imminent possibility of injury

- Obstacles that prevent safe entrance or exit from the unit

- Absence of a functioning toilet in the unit

- Inoperable smoke detectors

Non-emergency Repairs

SFHA Policy

The PHA will correct non-life threatening health and safety defects within 15 calendar days of the inspection date. If the PHA is unable to make repairs within that period due to circumstances beyond the PHA's control (e.g. required parts or services are not available, weather conditions, etc.) the PHA will notify the family of an estimated date of completion.

The family must allow the PHA access to the unit to make repairs.

Resident-Caused Damages

SFHA Policy

Damages to the unit beyond wear and tear will be billed to the tenant in accordance with the policies in 8-I.G., Maintenance and Damage Charges.

Repeated or excessive damages to the unit beyond normal wear and tear will be considered a serious or repeated violation of the lease.

Housekeeping

SFHA Policy

Residents whose housekeeping habits pose a non-emergency health or safety risk, encourage insect or rodent infestation, or cause damage to the unit are in violation of the lease. In these instances, the PHA will provide proper notice of a lease violation.

A re-inspection will be conducted within 30 days to confirm that the resident has complied with the requirement to abate the problem. Failure to abate the problem or allow for a re-inspection is considered a violation of the lease and may result in termination of tenancy in accordance with Chapter 13.

Notices of lease violation will also be issued to residents who purposely disengage the unit's smoke detector. Only one warning will be given. A second incidence will result in lease termination.

Chapter 9

REEXAMINATIONS

[24 CFR 960.257, 960.259, 966.4]

INTRODUCTION

The PHA is required to monitor each family's income and composition over time, and to adjust the family's rent accordingly. PHAs must adopt policies concerning the conduct of annual and interim reexaminations that are consistent with regulatory requirements, and must conduct reexaminations in accordance with such policies [24 CFR 960.257(c)].

The frequency with which the PHA must reexamine income for a family depends on whether the family pays income-based or flat rent. HUD requires the PHA to offer all families the choice of paying income-based rent or flat rent at least annually. The PHA's policies for offering families a choice of rents are located in Chapter 6.

This chapter discusses both annual and interim reexaminations.

Part I: Annual Reexaminations for Families Paying Income Based Rents. This part discusses the requirements for annual reexamination of income and family composition. Full reexaminations are conducted at least once a year for families paying income-based rents.

Part II: Reexaminations for Families Paying Flat Rents. This part contains the PHA's policies for conducting full reexaminations of family income and composition for families paying flat rents. These full reexaminations are conducted at least once every 3 years. This part also contains the PHA's policies for conducting annual updates of family composition for flat rent families.

Part III: Interim Reexaminations. This part includes HUD requirements and PHA policies related to when a family may and must report changes that occur between annual reexaminations.

Part IV: Recalculating Tenant Rent. After gathering and verifying required information for an annual or interim reexamination, the PHA must recalculate the tenant rent. While the basic policies that govern these calculations are provided in Chapter 6, this part lays out policies that affect these calculations during a reexamination.

Policies governing reasonable accommodation, family privacy, required family cooperation and program abuse, as described elsewhere in this ACOP, apply to annual and interim reexaminations.

PART I

ANNUAL REEXAMINATIONS FOR FAMILIES PAYING INCOME BASED RENTS

[24 CFR 960.257]

9-I.A. OVERVIEW

For those families who choose to pay income-based rent, the PHA must conduct a reexamination of income and family composition at least annually [24 CFR 960.257(a)(1)]. For families who choose flat rents, the PHA must conduct a reexamination of family composition at least annually, and must conduct a reexamination of family income at least once every 3 years [24 CFR 960.257(a)(2)]. Policies related to the reexamination process for families paying flat rent are located in Part II of this chapter.

For all residents of public housing, whether those residents are paying income-based or flat rents, the PHA must conduct an annual review of community service requirement compliance. This annual reexamination is also a good time to have residents sign consent forms for criminal background checks in case the criminal history of a resident is needed at some point to determine the need for lease enforcement or eviction.

The PHA is required to obtain information needed to conduct reexaminations. How that information will be collected is left to the discretion of the PHA. Families are required to provide current and accurate information on income, assets, allowances and deductions, family composition and community service compliance as part of the reexamination process [24 CFR 960.259].

This part contains the PHA's policies for conducting annual reexaminations.

9-I.B. SCHEDULING ANNUAL REEXAMINATIONS

The PHA must establish a policy to ensure that the annual reexamination for each family paying an income-based rent is completed within a 12 month period [24 CFR 960.257(a)(1)].

SFHA Policy

Generally, the PHA will schedule annual reexaminations to coincide with the family's anniversary date. The PHA will begin the annual reexamination process approximately 90 days in advance of the scheduled effective date.

Anniversary date is defined as 12 months from the effective date of the family's last annual reexamination or, during a family's first year in the program, from the effective date of the family's initial examination (admission).

If the family transfers to a new unit, the PHA will perform a new annual reexamination, and the anniversary date will be changed.

The PHA may also schedule an annual reexamination for completion prior to the anniversary date for administrative purposes.

Notification of and Participation in the Annual Reexamination Process

The PHA is required to obtain information needed to conduct annual reexaminations. How that information will be collected is left to the discretion of the PHA. However, PHAs should give tenants who were not provided the opportunity the option to complete Form HUD-92006 at this time [Notice PIH 2009-36].

SFHA Policy

Families generally are required to participate in an annual reexamination interview, which must be attended by the head of household, spouse, or co head. If participation in an in-person interview poses a hardship because of a family member's disability, the family should contact the PHA to request a reasonable accommodation.

Notification of annual reexamination interviews will be sent by first-class mail and will contain the date, time, and location of the interview. In addition, it will inform the family of the information and documentation that must be brought to the interview.

If the family is unable to attend a scheduled interview, the family should contact the PHA in advance of the interview to schedule a new appointment. In all circumstances, if a family does not attend the scheduled interview the PHA will send a second notification with a new interview appointment time.

If a family fails to attend two scheduled interviews without PHA approval, the family will be in violation of their lease and may be terminated in accordance with the policies in Chapter 13.

An advocate, interpreter, or other assistant may assist the family in the interview process.

9-I.C. CONDUCTING ANNUAL REEXAMINATIONS

The terms of the public housing lease require the family to furnish information necessary for the redetermination of rent and family composition [24 CFR 966.4(c)(2)].

SFHA Policy

Families will be asked to bring all required information (as described in the reexamination notice) to the reexamination appointment. The required information will include a PHA-designated reexamination form, an Authorization for the Release of Information/Privacy Act Notice, as well as supporting documentation related to the family's income, expenses, and family composition.

Any required documents or information that the family is unable to provide at the time of the interview must be provided within 10 business days of the interview. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension.

If the family does not provide the required documents or information within the required time frame (plus any extensions), the family will be in violation of their lease and may be terminated in accordance with the policies in Chapter 13.

The information provided by the family generally must be verified in accordance with the policies in Chapter 7. Unless the family reports a change, or the agency has reason to believe a change has occurred in information previously reported by the family, certain types of information that are verified at admission typically do not need to be re-verified on an annual basis. These include:

- Legal identity
- Age
- Social security numbers
- A person's disability status
- Citizenship or immigration status

Change in Unit Size

Changes in family or household composition may make it appropriate to consider transferring the family to comply with occupancy standards. The PHA may use the results of the annual reexamination to require the family to move to an appropriate size unit [24 CFR 960.257(a)(4)]. Policies related to such transfers are located in Chapter 12.

Criminal Background Checks

Information obtained through criminal background checks may be used for lease enforcement and eviction [24 CFR 5.903(e)(1)(ii)]. Criminal background checks of residents will be conducted in accordance with the policy in Section 13-IV.B.

Compliance with Community Service

For families who include nonexempt individuals, the PHA must determine compliance with community service requirements once each 12 months [24 CFR 960.257(a)(3)].

See Chapter 11 for the PHA's policies governing compliance with the community service requirement.

9-I.D. EFFECTIVE DATES

As part of the annual reexamination process, the PHA must make appropriate adjustments in the rent after consultation with the family and upon verification of the information [24 CFR 960.257(a)(1)].

SFHA Policy

In general, an *increase* in the tenant rent that results from an annual reexamination will take effect on the family's anniversary date, and the family will be notified at least 30 days in advance.

If less than 30 days remain before the scheduled effective date, the increase will take effect on the first of the month following the end of the 30-day notice period.

If the PHA chooses to schedule an annual reexamination for completion prior to the family's anniversary date for administrative purposes, the effective date will be determined by the PHA, but will always allow for the 30-day notice period.

If the family causes a delay in processing the annual reexamination, *increases* will be applied retroactively, to the scheduled effective date of the annual reexamination. The family will be responsible for any underpaid rent and may be offered a repayment agreement in accordance with the policies in Chapter 16.

In general, a *decrease* in the tenant rent that results from an annual reexamination will take effect on the family's anniversary date.

If the PHA chooses to schedule an annual reexamination for completion prior to the family's anniversary date for administrative purposes, the effective date will be determined by the PHA.

If the family causes a delay in processing the annual reexamination, *decreases* in the family share of the rent will be applied prospectively, from the first day of the month following completion of the reexamination processing.

Delays in reexamination processing are considered to be caused by the family if the family fails to provide information requested by the PHA by the date specified, and this delay prevents the PHA from completing the reexamination as scheduled.

PART II

REEXAMINATIONS FOR FAMILIES PAYING FLAT RENTS

[24 CFR 960.257(2)]

9-II.A. OVERVIEW

HUD requires that the PHA offer all families the choice of paying income-based rent or flat rent at least annually. The PHA's policies for offering families a choice of rents are located in Chapter 6.

For families who choose flat rents, the PHA must conduct a reexamination of family composition at least annually, and must conduct a reexamination of family income at least once every 3 years [24 CFR 960.257(a)(2)]. The PHA is only required to provide the amount of income-based rent the family might pay in those years that the PHA conducts a full reexamination of income and family composition, or upon request of the family after the family submits updated income information [24 CFR 960.253(e)(2)].

As it does for families that pay income-based rent, on an annual basis, the PHA must also review community service compliance and should have each adult resident consent to a criminal background check.

This part contains the PHA's policies for conducting reexaminations of families who choose to pay flat rents.

9-II.B. FULL REEXAMINATION OF FAMILY INCOME AND COMPOSITION

Frequency of Reexamination

SFHA Policy

For families paying flat rents, the PHA will conduct a full reexamination of family income and composition once every three (3) years.

Reexamination Policies

SFHA Policy

In conducting full reexaminations for families paying flat rents, the PHA will follow the policies used for the annual reexamination of families paying income-based rent as set forth in Sections 9-I.B through 9-I.D above.

9-II.C. REEXAMINATION OF FAMILY COMPOSITION (“ANNUAL UPDATE”)

As noted above, full reexaminations are conducted every 3 years for families paying flat rents. In the years between full reexaminations, regulations require the PHA to conduct a reexamination of family composition (“annual update”) [24 CFR 960.257(a)(2)].

The annual update process is similar to the annual reexamination process, except that the PHA does not collect information about the family’s income and expenses, and the family’s rent is not recalculated following an annual update.

Scheduling

The PHA must establish a policy to ensure that the reexamination of family composition for families choosing to pay the flat rent is completed at least annually [24 CFR 960.257(a)(2)].

SFHA Policy

For families paying flat rents, annual updates will be conducted in each of the 2 years following the full reexamination.

In scheduling the annual update, the PHA will follow the policy used for scheduling the annual reexamination of families paying income-based rent as set forth in Section 9-I.B. above.

Conducting Annual Updates

The terms of the public housing lease require the family to furnish information necessary for the redetermination of rent and family composition [24 CFR 966.4(c)(2)].

SFHA Policy

Generally, the family will not be required to attend an interview for an annual update. However, if the PHA determines that an interview is warranted, in such cases where a member will be added or removed from the lease, the family may be required to attend.

Notification of the annual update will be sent by first-class mail and will inform the family of the information and documentation that must be provided to the PHA. The family will have 10 business days to submit the required information to the PHA. If the family is unable to obtain the information or documents within the required time frame, the family may request an extension. The PHA will accept required documentation by mail, by fax, or in person.

If the family’s submission is incomplete, or the family does not submit the information in the required time frame, the PHA will send a second written notice to the family. The family will have 10 business days from the date of the second notice to provide the missing information or documentation to the PHA.

If the family does not provide the required documents or information within the required time frame (plus any extensions), the family will be in violation of their lease and may be terminated in accordance with the policies in Chapter 13.

PART III

INTERIM REEXAMINATIONS [24 CFR 960.257; 24 CFR 966.4]

9-III.A. OVERVIEW

Family circumstances may change throughout the period between annual reexaminations. HUD and PHA policies dictate what kinds of information about changes in family circumstances must be reported, and under what circumstances the PHA must process interim reexaminations to reflect those changes. HUD regulations also permit the PHA to conduct interim reexaminations of income or family composition at any time.

In addition to specifying what information the family must report, HUD regulations permit the family to request an interim determination if other aspects of the family's income or composition change. The PHA must complete the interim reexamination within a reasonable time after the family's request.

This part includes HUD and PHA policies describing what changes families are required to report, what changes families may choose to report, and how the PHA will process both PHA- and family-initiated interim reexaminations.

9-III.B. CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION

The PHA must adopt policies prescribing when and under what conditions the family must report changes in family composition. However, due to provisions of the public housing lease, the PHA has limited discretion in this area.

Changes in family or household composition may make it appropriate to consider transferring the family to comply with occupancy standards. Policies related to such transfers are located in Chapter 12.

SFHA Policy

All families, those paying income-based rent as well as flat rent, must report all changes in family and household composition that occur between annual reexaminations (or annual updates).

The PHA will conduct interim reexaminations to account for any changes in household composition that occur between annual reexaminations.

New Family Members Not Requiring Approval

The addition of a family member as a result of birth, adoption, or court-awarded custody does not require PHA approval. However, the family is required to promptly notify the PHA of the addition [24 CFR 966.4(a)(1)(v)].

SFHA Policy

The family must inform the PHA of the birth, adoption, or court-awarded custody of a child within 10 business days.

New Family and Household Members Requiring Approval

With the exception of children who join the family as a result of birth, adoption, or court-awarded custody, a family must request PHA approval to add a new family member [24 CFR 966.4(a)(1)(v)] or other household member (live-in aide or foster child) [24 CFR 966.4(d)(3)].

The PHA may adopt reasonable policies concerning residence by a foster child or a live-in aide, and defining the circumstances in which PHA consent will be given or denied. Under such policies, the factors considered by the PHA may include [24 CFR 966.4(d)(3)(i)]:

- Whether the addition of a new occupant may necessitate a transfer of the family to another unit, and whether such units are available.
- The PHA's obligation to make reasonable accommodation for persons with disabilities.

SFHA Policy

Families must request PHA approval to add a new family member, live-in aide, foster child, or foster adult. This includes any person not on the lease who is expected to stay in the unit for more than 14 consecutive days or a total of 30 cumulative calendar days during any 12-month period and therefore no longer qualifies as a "guest." Requests must be made in writing, submitted to the Property Office, and approved by the PHA prior to the individual moving into the unit.

The PHA will not approve the addition of new family or household members other than by birth, adoption, court-awarded custody, or marriage, if it will require the family to transfer to a larger size unit (under the transfer policy in Chapter 12), unless the family can demonstrate that there are medical needs or other extenuating circumstances, including reasonable accommodation, that should be considered by the PHA. Exceptions will be made on a case-by-case basis.

The PHA will not approve the addition of a new family or household member unless the individual meets the PHA's eligibility criteria (see Chapter 3) and documentation requirements (See Chapter 7, Part II).

If the PHA determines that an individual does not meet the PHA's eligibility criteria or documentation requirements, the PHA will notify the family in writing of its decision to deny approval of the new family or household member and the reasons for the denial.

The Property Manager will make the determination within 30 calendar days of receiving all information required to verify the individual's eligibility.

Departure of a Family or Household Member

If a family member ceases to reside in the unit, the family must inform the PHA within ten (10) business days. This requirement also applies to family members who had been considered temporarily absent, who are now permanently absent.

If a live-in aide, foster child, or foster adult ceases to reside in the unit, the family must inform the PHA within ten (10) business days. The resident shall provide proof of a new address via a lease agreement or utility bill in the name of the person requesting to be removed, before the adult is removed from the lease.

9-III.C. CHANGES AFFECTING INCOME OR EXPENSES

Interim reexaminations can be scheduled either because the PHA has reason to believe that changes in income or expenses may have occurred, or because the family reports a change. When a family reports a change, the PHA may take different actions depending on whether the family reported the change voluntarily, or because it was required to do so.

SFHA Policy

This section only applies to families paying income-based rent. Families paying flat rent are not required to report changes in income or expenses.

PHA-initiated Interim Reexaminations

PHA-initiated interim reexaminations are those that are scheduled based on circumstances or criteria defined by the PHA. They are not scheduled because of changes reported by the family.

SFHA Policy

The PHA will conduct interim reexaminations in each of the following instances:

For families receiving the Earned Income Disallowance (EID), the PHA will conduct an interim reexamination at the start, to adjust the exclusion with any changes in income, and at the conclusion of the second 12 month exclusion period (50 percent phase-in period).

If the family has reported zero income, the PHA will conduct an interim reexamination every 3 months as long as the family continues to report that they have no income.

If at the time of the annual reexamination, it is not feasible to anticipate a level of income for the next 12 months (e.g. seasonal or cyclic income), the PHA will schedule an interim reexamination to coincide with the end of the period for which it is feasible to project income.

If at the time of the annual reexamination, tenant-provided documents were used on a provisional basis due to the lack of third-party verification, and third-party verification becomes available, the PHA will conduct an interim reexamination.

The PHA may conduct an interim reexamination at any time in order to correct an error in a previous reexamination, or to investigate a tenant fraud complaint.

Family-Initiated Interim Reexaminations

The PHA must adopt policies prescribing when and under what conditions the family must report changes in family income or expenses [24 CFR 960.257(c)]. In addition, HUD regulations require that the family be permitted to obtain an interim reexamination any time the family has experienced a change in circumstances since the last determination [24 CFR 960.257(b)].

Required Reporting

HUD regulations give the PHA the freedom to determine the circumstances under which families will be required to report changes affecting income.

SFHA Policy

Families are required to report all increases in income, including new employment, within 10 business days of the date the change takes effect.

The PHA will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family's rent will change as a result of the increase. In all other cases, the PHA will note the information in the tenant file, but will not conduct an interim reexamination.

Families are not required to report any other changes in income or expenses.

Optional Reporting

The family may request an interim reexamination any time the family has experienced a change in circumstances since the last determination [24 CFR 960.257(b)]. The PHA must process the request if the family reports a change that will result in a reduced family income [PH Occ GB, p. 159].

If a family reports a decrease in income from the loss of welfare benefits due to fraud or non-compliance with a welfare agency requirement to participate in an economic self-sufficiency program, the family's share of the rent will not be reduced [24 CFR 5.615]. For more information regarding the requirement to impute welfare income see Chapter 6.

SFHA Policy

If a family reports a change that it was not required to report and that would result in an increase in the tenant rent, the PHA will note the information in the tenant file, but will not conduct an interim reexamination.

If a family reports a change that it was not required to report and that would result in a decrease in the tenant rent, the PHA will conduct an interim reexamination. See Section 9-III.D. for effective dates.

Families may report changes in income or expenses at any time.

9-III.D. PROCESSING THE INTERIM REEXAMINATION

Method of Reporting

SFHA Policy

The family may notify the PHA of changes in writing.

Generally, the family will not be required to attend an interview for an interim reexamination. However, if the PHA determines that an interview is warranted, the family may be required to attend.

Based on the type of change reported, the PHA will determine the documentation the family will be required to submit. The family must submit any required information or documents within ten (10) business days of receiving a request from the PHA. This time frame may be extended for good cause with PHA approval. The PHA will accept required documentation by mail, by fax, or in person.

Effective Dates

The PHA must make the interim reexamination within a reasonable time after the family request [24 CFR 960.257(b)].

SFHA Policy

If the family share of the rent is to *increase*:

The increase generally will be effective on the first of the month following 30 days' notice to the family.

If a family fails to report a change within the required time frames, or fails to provide all required information within the required time frames, the increase will be applied retroactively, to the date it would have been effective had the information been provided on a timely basis. The family will be responsible for any underpaid rent and may be offered a repayment agreement in accordance with the policies in Chapter 16.

If the family share of the rent is to *decrease*:

The decrease will be effective on the first day of the month following the month in which the change was reported. In cases where the change cannot be verified until after the date the change would have become effective, the change will be made retroactively.

PART IV

RECALCULATING TENANT RENT

9-IV.A. OVERVIEW

For those families paying income-based rent, the PHA must recalculate the rent amount based on the income information received during the reexamination process and notify the family of the changes [24 CFR 966.4, 960.257]. While the basic policies that govern these calculations are provided in Chapter 6, this part lays out policies that affect these calculations during a reexamination.

9-IV.B. CHANGES IN UTILITY ALLOWANCES [24 CFR 965.507, 24 CFR 966.4]

The tenant rent calculations must reflect any changes in the PHA's utility allowance schedule [24 CFR 960.253(c)(3)]. Chapter 16 discusses how utility allowance schedules are established.

SFHA Policy

Unless the PHA is required to revise utility allowances retroactively, revised utility allowances will be applied to a family's rent calculations at the first annual reexamination after the allowance is adopted.

9-IV.C. NOTIFICATION OF NEW TENANT RENT

The public housing lease requires the PHA to give the tenant written notice stating any change in the amount of tenant rent, and when the change is effective [24 CFR 966.4(b)(1)(ii)].

When the PHA re-determines the amount of rent (Total Tenant Payment or Tenant Rent) payable by the tenant, not including determination of the PHA's schedule of Utility Allowances for families in the PHA's Public Housing Program, or determines that the tenant must transfer to another unit based on family composition, the PHA must notify the tenant that the tenant may ask for an explanation stating the specific grounds of the PHA determination, and that if the tenant does not agree with the determination, the tenant shall have the right to request a hearing under the PHA's grievance procedure [24 CFR 966.4(c)(4)].

SFHA Policy

The notice to the family will include the annual and adjusted income amounts that were used to calculate the tenant rent.

9-IV.D. DISCREPANCIES

During an annual or interim reexamination, the PHA may discover that information previously reported by the family was in error, or that the family intentionally misrepresented information. In addition, the PHA may discover errors made by the PHA. When errors resulting in the overpayment or underpayment of rent are discovered, corrections will be made in accordance with the policies in Chapter 15.

Chapter 10

PETS

[24 CFR 5, Subpart C; 24 CFR 960, Subpart G]

INTRODUCTION

In specific, pre-approved, circumstances, a resident may house a pet if:

- Requested as an assistance animal as defined below and defined in California Health and Safety Code section 50685.5 or;
- The tenant resides in an elderly/disabled development.

This chapter explains the PHA's policies on the keeping of pets and any criteria or standards pertaining to the policies. The rules adopted are reasonably related to the legitimate interest of the PHA to provide a decent, safe and sanitary living environment for all tenants, and to protect and preserve the physical condition of the property, as well as the financial interest of the PHA.

The chapter is organized as follows:

Part I: Assistance Animals. This part explains the difference between assistance animals and pets and contains policies related to the designation of an assistance animal as well as their care and handling.

Part II: Pet deposits and fees for elderly/disabled developments. This part contains policies for pet deposits and fees that are applicable to elderly/disabled developments.

Part III: Pet policies for all developments. This part includes pet policies that are common to both assistance animals and elderly/disabled developments.

PART I

ASSISTANCE ANIMALS

[Section 504; Fair Housing Act (42 U.S.C.); 24 CFR 5.303; 24 CFR 960.705]

10-I.A. OVERVIEW

This part discusses situations under which permission for an assistance animal may be denied, and also establishes standards for the care of assistance animals.

Assistance animals are animals that assist, support, or provide service to a person with a disability, or that provide emotional support that alleviates one or more identified symptoms or effects of a person's disability. Assistance animals – often referred to as “service animals,” “assistive animals,” “support animals,” or “therapy animals” – perform many disability-related functions, including but not limited to the following:

- Guiding individuals who are blind or have low vision
- Alerting individuals who are deaf or hearing impaired
- Providing minimal protection or rescue assistance
- Pulling a wheelchair
- Fetching items
- Alerting persons to impending seizures
- Providing emotional support to persons with disabilities who have a disability-related need for such support

Assistance animals that are needed as a reasonable accommodation for persons with disabilities are not considered pets, and thus, are not subject to the PHA's pet policies described in Parts II through III of this chapter [24 CFR 5.303; 960.705].

10-I.B. APPROVAL OF ASSISTANCE ANIMALS

A person with a disability is not automatically entitled to have an assistance animal. Reasonable accommodation requires that there is a relationship between the person's disability and his or her need for the animal [PH Occ GB, p. 179].

A PHA may not refuse to allow a person with a disability to have an assistance animal merely because the animal does not have formal training. Some, but not all, animals that assist persons with disabilities are professionally trained. Other assistance animals are trained by the owners themselves and, in some cases, no special training is required. The question is whether or not the animal performs the assistance or provides the benefit needed by the person with the disability [PH Occ GB, p. 178].

A PHA's refusal to permit persons with a disability to use and live with an assistance animal that is needed to assist them, would violate Section 504 of the Rehabilitation Act and the Fair Housing Act unless [PH Occ GB, p. 179]:

- There is reliable objective evidence that the animal poses a direct threat to the health or safety of others that cannot be reduced or eliminated by a reasonable accommodation
- There is reliable objective evidence that the animal would cause substantial physical damage to the property of others

PHAs have the authority to regulate assistance animals under applicable federal, state, and local law [24 CFR 5.303(b)(3); 960.705(b)(3)].

SFHA Policy

For an animal to be excluded from the pet policy and be considered an assistance animal, there must be a person with disabilities in the household, and the family must request and the PHA approve a reasonable accommodation in accordance with the policies contained in Chapter 2.

All tenants must still comply with all aspects of this Pet Policy. If the assistance animal is trained, the documentation of the animals training or certification must be submitted to the property office.

To determine that a dog may be allowed into a family housing development, the head of household must provide a written certification from a licensed medical doctor on a form provided by the SFHA that a member of the household has a disability and requires the assistance of an animal as either a service or companion animal.

10-I.C. CARE AND HANDLING

HUD regulations do not affect any authority a PHA may have to regulate assistance animals under federal, state, and local law [24 CFR 5.303; 24 CFR 960.705].

SFHA Policy

Residents must care for assistance animals in a manner that complies with state and local laws, including anti-cruelty laws.

Residents must ensure that assistance animals do not pose a direct threat to the health or safety of others, or cause substantial physical damage to the development, dwelling unit, or property of other residents.

When a resident's care or handling of an assistance animal violates these policies, the PHA will consider whether the violation could be reduced or eliminated by a reasonable accommodation. If the PHA determines that no such accommodation can be made, the PHA may withdraw the approval of a particular assistance animal.

PART II

PET DEPOSITS AND FEES IN ELDERLY/DISABLED DEVELOPMENTS

10-II.A. OVERVIEW

This part describes the PHA's policies for pet deposits and fees in elderly, disabled and mixed population developments. Policies governing deposits and fees in general occupancy developments are described in Part IV.

10-II.B. PET DEPOSITS

Payment of Deposit

The PHA may require tenants who own or keep pets in their units to pay a refundable pet deposit. This deposit is in addition to any other financial obligation generally imposed on tenants of the project [24 CFR 5.318(d)(1)].

The pet deposit is not part of the rent payable by the resident [24 CFR 5.318(d)(5)].

SFHA Policy

Pet owners are required to pay a pet deposit in addition to any other required deposits. The amount of the deposit is \$100.00. However, where a tenants TTP is lower than \$100.00, the deposit shall be equivalent to one month's rent and must be paid in full before the pet is brought on the premises.

Refund of Deposit [24 CFR 5.318(d)(1)]

The PHA may use the pet deposit only to pay reasonable expenses directly attributable to the presence of the pet, including (but not limited to) the costs of repairs and replacements to, and fumigation of, the tenant's dwelling unit. The PHA must refund the unused portion of the pet deposit to the tenant within a reasonable time after the tenant moves from the project or no longer owns or keeps a pet in the unit.

SFHA Policy

The resident must inform the Property Office that the pet has been removed from the unit within 10 business days of the removal. The PHA will provide the resident with a written list of any charges against the pet deposit within 10 business days of the pet removal inspection. If the resident disagrees with the amount charged to the pet deposit, the PHA will provide a meeting to discuss the charges.

The PHA will refund the pet deposit to the resident, less the costs of any damages caused by the pet to the dwelling unit, within 30 business days of move-out or removal of the pet from the unit.

The resident will be billed for any amount that exceeds the pet deposit.

10-II.C. OTHER CHARGES

Pet-Related Damages During Occupancy

SFHA Policy

All reasonable expenses incurred by the PHA as a result of damages directly attributable to the presence of the pet in the project will be the responsibility of the resident, including:

The cost of repairs and replacements to the resident's dwelling unit

Fumigation of the dwelling unit

Repairs to common areas of the project

The expense of flea elimination shall also be the responsibility of the resident.

If the resident is in occupancy when such costs occur, the resident shall be billed for such costs in accordance with the policies in Section 8-I.G, Maintenance and Damage Charges. Pet deposits will not be applied to the costs of pet-related damages during occupancy.

Charges for pet-related damage are not part of rent payable by the resident.

Pet Waste Removal Charge

The regulations do not address the PHA's ability to impose charges for house pet rule violations. However, charges for violation of PHA pet rules may be treated like charges for other violations of the lease and PHA tenancy rules.

SFHA Policy

A separate pet waste removal charge of \$10.00 per occurrence will be assessed against pet owners who fail to remove pet waste in accordance with this policy.

Notices of pet waste removal charges will be in accordance with requirements regarding notices of adverse action. Charges are due and payable 14 calendar days after billing. If the family requests a grievance hearing within the required timeframe, the PHA may not take action for nonpayment of the charge until the conclusion of the grievance process.

Charges for pet waste removal are not part of rent payable by the resident.

PART III

PET POLICIES FOR ALL DEVELOPMENTS

[24 CFR 5, Subpart C; 24 CFR 960, Subpart G]

10-III.A. OVERVIEW

The purpose of a pet policy is to establish clear guidelines for ownership of pets and to ensure that no applicant or resident is discriminated against regarding admission or continued occupancy because of ownership of pets. It also establishes reasonable rules governing the keeping of common household pets. This part contains pet policies that apply to all developments.

10-III.B. MANAGEMENT APPROVAL OF PETS

Registration of Pets

PHAs may require registration of the pet with the PHA [24 CFR 960.707(b)(5)].

SFHA Policy

Pets must be registered with the PHA before they are brought onto the premises. The tenant must sign a statement acknowledging that he/she has received and read the Pet Rules and agrees to comply with them and accept any and all financial and personal liability associated with the personal pet ownership in the housing development.

Registration includes documentation signed by a licensed veterinarian or state/local authority that the pet has received all inoculations required by state or local law, and that the pet has no communicable disease(s) and is pest-free. This registration must be renewed annually and will be coordinated with the annual reexamination date.

Evidence that the pet has received all current inoculations or boosters including parvovirus, distemper, hepatitis, leptospirosis, feline distemper, rhino tracheitis, calicivirus, and pneumonitis must be provided.

The tenant shall provide the SFHA with a color picture of the pet, except for fish, at the time of application and when the pet reaches adult size.

Pets will not be approved to reside in a unit until completion of the registration requirements.

If a pet resides in the unit prior to approval, this is considered a lease violation and legal action will be enforced.

Refusal to Register Pets

SFHA Policy

The PHA will refuse to register a pet if:

- The pet is not *a common household pet* as defined in Section 10-III.C. below
- Keeping the pet would violate any pet restrictions listed in this policy

The pet owner fails to provide complete pet registration information, or fails to update the registration annually

The applicant has previously been charged with animal cruelty under state or local law; or has been evicted, had to relinquish a pet or been prohibited from future pet ownership due to pet rule violations or a court order

The PHA reasonably determines that the pet owner is unable to keep the pet in compliance with the pet rules and other lease obligations. The pet's temperament and behavior may be considered as a factor in determining the pet owner's ability to comply with provisions of the lease.

If the PHA refuses to register a pet, a written notification will be sent to the pet owner within 10 business days of the PHA's decision. The notice will state the reason for refusing to register the pet and will inform the family of their right to appeal the decision in accordance with the PHA's grievance procedures.

Pet Agreement

SFHA Policy

Residents who have been approved to have a pet must enter into a pet agreement with the PHA, or the approval of the pet will be withdrawn.

The pet agreement is the resident's certification that he or she has received a copy of the PHA's pet policy and applicable house rules, that he or she has read the policies and/or rules, understands them, and agrees to comply with them.

The resident further certifies by signing the pet agreement that he or she understands that noncompliance with the PHA's pet policy and applicable house rules may result in the withdrawal of PHA approval of the pet or termination of tenancy.

10-III.C. STANDARDS FOR PETS [24 CFR 5.318; 960.707(b)]

PHAs may establish reasonable requirements related to pet ownership including, but not limited to:

- Limitations on the number of animals in a unit, based on unit size
- Prohibitions on types of animals that the PHA classifies as dangerous, provided that such classifications are consistent with applicable state and local law
- Prohibitions on individual animals, based on certain factors, including the size and weight of the animal
- Requiring pet owners to have their pets spayed or neutered

PHA's may not require pet owners to have any pet's vocal cords removed.

Definition of "Common Household Pet"

There is no regulatory definition of common household pet for public housing programs, although the regulations for pet ownership in both elderly/disabled and general occupancy developments use the term. The regulations for pet ownership in elderly/disabled developments expressly authorize PHAs to define the term [24 CFR 5.306(2)].

SFHA Policy

Common household pet means a domesticated animal, such as a dog, cat, bird, or fish that is traditionally recognized as a companion animal and is kept in the home for pleasure rather than commercial purposes.

The following animals are not considered common household pets:

Reptiles

Rodents

Insects

Arachnids

Wild animals or feral animals

Pot-bellied pigs

Animals used for commercial breeding

Pet RestrictionsSFHA Policy

The following animals are not permitted:

Any animal whose adult weight will exceed 25 pounds

Dogs of the Pit Bull, Rottweiler, Chow, or Boxer breeds

Ferrets or other animals whose natural protective mechanisms pose a risk to small children of serious bites or lacerations

Any animal not permitted under state or local law or code

Number of PetsSFHA Policy

Residents may own a maximum of two (2) pets, and one (1) fish aquarium.

In the case of fish, residents may keep no more than can be maintained in a safe and healthy manner in a tank holding up to ten (10) gallons.

Other RequirementsSFHA Policy

Dogs and cats must be spayed or neutered at the time of registration or, in the case of underage animals, within 30 calendar days of the pet reaching six (6) months of age. Exceptions may be made upon veterinary certification that subjecting this particular pet to the procedure would be temporarily or permanently medically unsafe or unnecessary.

Pets must be licensed in accordance with state or local law. Residents must provide proof of licensing at the time of registration and annually, in conjunction with the resident's annual reexamination.

A color photograph of the pet, except for fish, must be provided at the time of application and when the pet reaches adult size.

10-III.D. PET RULES

Pet owners must maintain pets responsibly, in accordance with PHA policies, and in compliance with applicable state and local public health, animal control, and animal cruelty laws and regulations [24 CFR 5.315; 24 CFR 960.707(a)].

Pet Area Restrictions

SFHA Policy

Pets must be maintained within the resident's unit. When outside of the unit (within the building or on the grounds) dogs and cats must be kept on a leash or carried and under the control of the resident or other responsible individual at all times.

Pets other than dogs or cats must be kept in a cage or carrier when outside of the unit.

Pets are not permitted in common areas including lobbies, community rooms and laundry areas except for those common areas which are entrances to and exits from the building.

Pet owners are not permitted to exercise pets or permit pets to deposit waste on project premises outside of the areas designated for such purposes.

Cleanliness

SFHA Policy

The pet owner shall be responsible for the removal of waste from the exercise area by placing it in a sealed plastic bag and disposing of it in a container provided by the PHA.

The pet owner shall take adequate precautions to eliminate any pet odors within or around the unit and to maintain the unit in a sanitary condition at all times.

Litter box requirements:

Pet owners must promptly dispose of waste from litter boxes and must maintain litter boxes in a sanitary manner.

Litter shall not be disposed of by being flushed through a toilet.

Litter boxes shall be kept inside the resident's dwelling unit.

Alterations to Unit

SFHA Policy

Pet owners shall not alter their unit, patio, premises or common areas to create an enclosure for any animal.

Installation of pet doors is prohibited.

Noise

SFHA Policy

Pet owners must agree to control the noise of pets so that such noise does not constitute a nuisance to other residents or interrupt their peaceful enjoyment of their housing unit or

premises. This includes, but is not limited to loud or continuous barking, howling, whining, biting, scratching, chirping, or other such activities.

Pet Care

SFHA Policy

Each pet owner shall be responsible for adequate care, nutrition, exercise and medical attention for his/her pet.

Each pet owner shall be responsible for appropriately training and caring for his/her pet to ensure that the pet is not a nuisance or danger to other residents and does not damage PHA property.

No animals may be tethered or chained inside or outside the dwelling unit at any time.

Responsible Parties

SFHA Policy

The pet owner will be required to designate two responsible parties for the care of the pet if the health or safety of the pet is threatened by the death or incapacity of the pet owner, or by other factors that render the pet owner unable to care for the pet.

A resident who cares for another resident's pet must notify the PHA and sign a statement that they agree to abide by all of the pet rules. The resident must specify the time period for which he/she will be caring for the other residents pet.

Pets Temporarily on the Premises

SFHA Policy

Pets that are not owned by a tenant are not allowed on the premises. Residents are prohibited from feeding or harboring stray animals.

This rule does not apply to visiting pet programs sponsored by a humane society or other non-profit organizations, and approved by the PHA.

Pet Rule Violations

SFHA Policy

All complaints of cruelty and all dog bites will be referred to animal control or an applicable agency for investigation and enforcement. This includes:

- Pets left unattended for a period of twenty-four (24) hours or longer, wherein the SFHA may enter the dwelling unit to remove the pet;
- Management determines that the pet is not properly cared for;
- The pet presents a threat to the safety and security of other tenants, SFHA employees, contractors and others on the premises;
- The pet is destructive or causes an infestation;

- The pet disturbs other tenants for reasons including but not limited to noise, odor, cleanliness, and sanitation; or
- Tenant fails to re-validate the pet ownership permit as required in the Pet Ownership Policy.

If a determination is made on objective facts supported by written statements, that a resident/pet owner has violated the pet rules, written notice will be served.

The notice will contain a brief statement of the factual basis for the determination and the pet rule(s) that were violated. The notice will also state:

That the pet owner has ten (10) business days from the effective date of the service of notice to correct the violation or make written request for a meeting to discuss the violation

That the pet owner is entitled to be accompanied by another person of his or her choice at the meeting

That the pet owner's failure to correct the violation, request a meeting, or appear at a requested meeting may result in initiation of procedures to remove the pet, or to terminate the pet owner's tenancy.

Notice for Pet Removal

SFHA Policy

If the pet owner and the PHA are unable to resolve the violation at the meeting or the pet owner fails to correct the violation in the time period allotted by the PHA, the PHA may serve notice to remove the pet.

The notice will contain:

A brief statement of the factual basis for the PHA's determination of the pet rule that has been violated

The requirement that the resident /pet owner must remove the pet within 30 calendar days of the notice

A statement that failure to remove the pet may result in the initiation of termination of tenancy procedures

Pet Removal

SFHA Policy

If the death or incapacity of the pet owner threatens the health or safety of the pet, or other factors occur that render the owner unable to care for the pet, the situation will be reported to the responsible party designated by the pet owner.

If the responsible party is unwilling or unable to care for the pet, or if the PHA after reasonable efforts cannot contact the responsible party, the PHA may contact the appropriate state or local agency and request the removal of the pet.

Termination of Tenancy

SFHA Policy

The PHA may initiate procedures for termination of tenancy based on a pet rule violation if:

The pet owner has failed to remove the pet or correct a pet rule violation within the time period specified

The pet rule violation is sufficient to begin procedures to terminate tenancy under terms of the lease

Emergencies

SFHA Policy

The PHA will take all necessary steps to ensure that pets that become vicious, display symptoms of severe illness, or demonstrate behavior that constitutes an immediate threat to the health or safety of others, are immediately removed from the premises by referring the situation to the appropriate state or local entity authorized to remove such animals.

If it is necessary for the PHA to place the pet in a shelter facility, the cost will be the responsibility of the pet owner.

If the pet is removed as a result of any aggressive act on the part of the pet, the pet will not be allowed back on the premises.

Chapter 11

COMMUNITY SERVICE

INTRODUCTION

This chapter explains HUD regulations requiring PHAs to implement a community service program for all nonexempt adults living in public housing.

This chapter describes HUD regulations and PHA policies related to these topics in two parts:

Part I: Community Service Requirements. This part describes who is subject to the community service requirement, who is exempt, and HUD's definition of economic self-sufficiency.

Part II: PHA Implementation of Community Service. This part provides PHA policy regarding PHA implementation and program design.

PART I
COMMUNITY SERVICE REQUIREMENT

11-I.A. OVERVIEW

HUD regulations pertaining to the community service requirement are contained in 24 CFR 960 Subpart F (960.600 through 960.609). PHAs and residents must comply with the community service requirement, effective with PHA fiscal years that commenced on or after October 1, 2000. Per 903.7(l)(1)(iii), the PHA Plan must contain a statement of how the PHA will comply with the community service requirement, including any cooperative agreement that the PHA has entered into or plans to enter into.

Community service is the performance of voluntary work or duties that are a public benefit, and that serve to improve the quality of life, enhance resident self-sufficiency, or increase resident self-responsibility in the community. Community service is not employment and may not include political activities [24 CFR 960.601(b)].

In administering community service requirements, the PHA must comply with all nondiscrimination and equal opportunity requirements [24 CFR 960.605(c)(5)].

11-I.B. REQUIREMENTS

Each adult resident of the PHA, who is not exempt, must [24 CFR 960.603(a)]:

- Contribute 8 hours per month of community service; or
- Participate in an economic self-sufficiency program (as defined in the regulations) for 8 hours per month; or
- Perform 8 hours per month of combined activities (community service and economic self-sufficiency programs).

SFHA Policy

An individual may not skip a month and then double up the following month, unless special circumstances warrant it. The PHA will make the determination of whether to permit a deviation from the schedule.

Individuals who have special circumstances which they believe will prevent them from completing the required community service hours for a given month, must notify the PHA in writing within 5 business days of the circumstances becoming known. The PHA will review the request and notify the individual, in writing, of its determination within 10 business days. The PHA may require those individuals to provide documentation to support their claim.

Definitions

Exempt Individual [24 CFR 960.601(b), Notice PIH 2009-48]

An *exempt individual* is an adult who:

- Is age 62 years or older
- Is blind or disabled (as defined under section 216[i][I] or 1614 of the Social Security Act), and who certifies that because of this disability s/he is unable to comply with the service provisions
- Is a primary caretaker of such an individual
- Is engaged in work activities

SFHA Policy

The PHA will consider 30 hours per week as the minimum number of hours needed to qualify for a work activity exemption.

- Is able to meet requirements under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of the state in which the PHA is located, including a state-administered welfare-to-work program; or
- Is a member of a family receiving assistance, benefits, or services under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of the state in which the PHA is located, including a state-administered welfare-to-work program, and has not been found by the state or other administering entity to be in noncompliance with such program.

Community Service [24 CFR 960.601(b), Notice PIH 2009-48]

Community service is the performance of voluntary work or duties that are a public benefit, and that serve to improve the quality of life, enhance resident self-sufficiency, or increase resident self responsibility in the community. Community service is not employment and may not include political activities.

Eligible community service activities include, but are not limited to, work at:

- Local public or nonprofit institutions such as schools, head start programs, before or after school programs, child care centers, hospitals, clinics, hospices, nursing homes, recreation centers, senior centers, adult day care programs, homeless shelters, feeding programs, food banks (distributing either donated or commodity foods), or clothes closets (distributing donated clothing)
- Nonprofit organizations serving PHA residents or their children such as: Boy or Girl Scouts, Boys or Girls Club, 4-H clubs, Police Assistance League (PAL), organized children's recreation, mentoring or education programs, Big Brothers or Big Sisters, garden centers, community clean-up programs, beautification programs
- Programs funded under the Older Americans Act, such as Green Thumb, Service Corps of Retired Executives, senior meals programs, senior centers, Meals on Wheels
- Public or nonprofit organizations dedicated to seniors, youth, children, residents, citizens, special-needs populations or with missions to enhance the environment, historic resources, cultural identities, neighborhoods, or performing arts
- PHA housing to improve grounds or provide gardens (so long as such work does not alter the PHA's insurance coverage); or work through resident organizations to help other residents with problems, including serving on the Resident Advisory Board
- Care for the children of other residents so parent may volunteer

PHAs may form their own policy in regards to accepting community services at profit-motivated entities, acceptance of volunteer work performed at homes or offices of general private citizens, and court-ordered or probation-based work.

SFHA Policy

The PHA will accept community services at profit-motivated entities, volunteer work performed at homes or offices of general private citizens, and court-ordered or probation-based work as eligible community service activities.

Economic Self-Sufficiency Program [24 CFR 5.603(b), Notice PIH 2009-48]

For purposes of satisfying the community service requirement, an *economic self-sufficiency program* is defined by HUD as any program designed to encourage, assist, train, or facilitate economic independence of assisted families or to provide work for such families.

Eligible self-sufficiency activities include, but are not limited to:

- Job readiness or job training
- Training programs through local one-stop career centers, workforce investment boards (local entities administered through the U.S. Department of Labor), or other training providers
- Employment counseling, work placement, or basic skills training
- Education, including higher education (junior college or college), GED classes, or reading, financial, or computer literacy classes
- Apprenticeships (formal or informal)
- English proficiency or English as a second language classes
- Budgeting and credit counseling
- Any activity required by the Department of Public Assistance under Temporary Assistance for Needy Families (TANF)
- Any other program necessary to ready a participant to work (such as substance abuse or mental health counseling)

Work Activities [42 U.S.C. 607(d)]

As it relates to an exemption from the community service requirement, *work activities* means:

- Unsubsidized employment
- Subsidized private sector employment
- Subsidized public sector employment
- Work experience (including work associated with the refurbishing of publicly assisted housing) if sufficient private sector employment is not available
- On-the-job training
- Job search and job readiness assistance
- Community service programs
- Vocational educational training (not to exceed 12 months with respect to any individual)
- Job skills training directly related to employment
- Education directly related to employment, in the case of a recipient who has not received a high school diploma or a certificate of high school equivalency
- Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence, in the case of a recipient who has not completed secondary school or received such a certificate
- Provision of child care services to an individual who is participating in a community service program

Notification Requirements [24 CFR 960.605(c)(2), Notice PIH 2009-48]

The PHA must give each family a written description of the community service requirement, the process for claiming status as an exempt person, and the process for PHA verification of exempt status. The PHA must also notify the family of its determination identifying the family members who are subject to the service requirement, and the family members who are exempt. In addition, the family must sign a certification, Attachment A of Notice PIH 2009-48, that they have received and read the policy and understand that if they are not exempt, failure to comply with the requirement will result in nonrenewal of their lease.

SFHA Policy

The PHA will provide the family with a copy of the Community Service Policy found in Exhibit 11-1 of this chapter, at lease-up, lease renewal, when a family member is determined to be subject to the community service requirement during the lease term, and at any time upon the family's request.

On an annual basis, at the time of lease renewal, the PHA will notify the family in writing of the family members who are subject to the community service requirement and the family members who are exempt. If the family includes nonexempt individuals the notice will include a list of agencies in the community that provide volunteer and/or training opportunities, as well as a documentation form on which they may record the activities they perform and the number of hours contributed. The form will also have a place for a signature by an appropriate official, who will certify to the activities and hours completed.

11-I.C. DETERMINATION OF EXEMPTION STATUS AND COMPLIANCE [24 CFR 960.605(c)(3)]

The PHA must review and verify family compliance with service requirements annually at least thirty days before the end of the twelve month lease term. The policy for documentation and verification of compliance with service requirements may be found at Section 11-I.D., Documentation and Verification.

SFHA Policy

Where the lease term does not coincide with the effective date of the annual reexamination, the PHA will change the effective date of the annual reexamination to coincide with the lease term. In making this change, the PHA will ensure that the annual reexamination is conducted within 12 months of the last annual reexamination.

Annual Determination

Determination of Exemption Status

An exempt individual is excused from the community service requirement [24 CFR 960.603(a)].

SFHA Policy

At least 60 days prior to lease renewal, the PHA will review and verify the exemption status of all adult family members. This verification will only be done on an annual basis unless the family reports a change or the PHA has reason to believe that an individual's exemption status has changed. For individuals who are exempt because they are 62 years of age and older, verification of exemption status will be done only at the initial examination.

Upon completion of the verification process, the PHA will notify the family of its determination in accordance with the policy in Section 11-I.B., Notification Requirements.

Determination of Compliance

The PHA must review resident family compliance with service requirements annually at least 30 days before the end of the twelve month lease term [24 CFR 960.605(c)(3)]. As part of this review, the PHA must verify that any family member that is not exempt from the community service requirement has met his or her service obligation.

SFHA Policy

Approximately 60 days prior to the end of the lease term, the PHA will provide written notice requiring the family to submit documentation that all subject family members have complied with the service requirement. The family will have 10 business days to submit the PHA required documentation form(s).

If the family fails to submit the required documentation within the required timeframe, or PHA approved extension, the subject family members will be considered noncompliant with community service requirements, and notices of noncompliance will be issued pursuant to the policies in Section 11-I.E., Noncompliance.

Change in Status between Annual Determinations

SFHA Policy

Exempt to Nonexempt Status

If an exempt individual becomes nonexempt during the twelve month lease term, it is the family's responsibility to report this change to the PHA within 10 business days.

Within 10 business days of a family reporting such a change, or the PHA determining such a change is necessary, the PHA will provide written notice of the effective date of the requirement, a list of agencies in the community that provide volunteer and/or training opportunities, as well as a documentation form on which the family member may record the activities performed and number of hours contributed.

The effective date of the community service requirement will be the first of the month following 30 day notice.

Nonexempt to Exempt Status

If a nonexempt person becomes exempt during the twelve month lease term, it is the family's responsibility to report this change to the PHA within 10 business days. Any claim of exemption will be verified by the PHA in accordance with the policy at 11-I.D., Documentation and Verification of Exemption Status.

Within 10 business days of a family reporting such a change, or the PHA determining such a change is necessary, the PHA will provide the family written notice that the family member is no longer subject to the community service requirement, if the PHA is able to verify the exemption.

The exemption will be effective immediately.

11-I.D. DOCUMENTATION AND VERIFICATION [24 CFR 960.605(c)(4)]

The PHA must retain reasonable documentation of service requirement performance or exemption in participant files.

Documentation and Verification of Exemption Status

SFHA Policy

All family members who claim they are exempt from the community service requirement will be required to sign the community service exemption certification form found in Exhibit 11-3. The PHA will provide a completed copy to the family and will keep a copy in the tenant file.

The PHA will verify that an individual is exempt from the community service requirement by following the verification hierarchy and documentation requirements in Chapter 7.

The PHA makes the final determination whether or not to grant an exemption from the community service requirement. If a resident does not agree with the PHA's determination, s/he can dispute the decision through the PHA's grievance procedures (see Chapter 14).

Documentation and Verification of Compliance

At each regularly scheduled reexamination, each nonexempt family member presents a signed standardized certification form developed by the PHA of community service and self-sufficiency activities performed over the last 12 months [Notice PIH 2009-48].

If qualifying community service activities are administered by an organization other than the PHA, a family member who is required to fulfill a service requirement must provide certification to the PHA, signed by the organization, that the family member has performed the qualifying activities [24 CFR 960.607].

SFHA Policy

If anyone in the family is subject to the community service requirement, the PHA will provide the family with community service documentation forms at admission, at lease renewal, when a family member becomes subject to the community service requirement during the lease term, or upon request by the family.

Each individual who is subject to the requirement will be required to record their community service or self-sufficiency activities and the number of hours contributed on the required form. The certification form will also include places for signatures and phone numbers of supervisors, instructors, and counselors certifying to the number of hours contributed.

Families will be required to submit the documentation to the PHA, upon request by the PHA.

If the PHA has reasonable cause to believe that the certification provided by the family is false or fraudulent, the PHA has the right to require third-party verification.

11-I.E. NONCOMPLIANCE

Initial Noncompliance

The lease specifies that it is renewed automatically for all purposes, unless the family fails to comply with the community service requirement. Violation of the service requirement is grounds for nonrenewal of the lease at the end of the twelve month lease term, but not for termination of tenancy during the course of the twelve month lease term [24 CFR 960.603(b)].

If the tenant or another family member has violated the community service requirement, the PHA may not renew the lease upon expiration of the twelve-month term of the lease, unless the tenant and any other noncompliant family member enter into a written agreement with the PHA. Under this agreement the tenant or noncompliant family member must agree to cure the noncompliance by completing the additional hours of community service or economic self-sufficiency needed to make up the total number of hours required, over the twelve-month term of the new lease. In addition, all other members of the family who are subject to the service requirement must be currently complying with the service requirement or must no longer be residing in the unit [24 CFR 960.607(c), Notice PIH 2009-48].

Notice of Initial Noncompliance [24 CFR 960.607(b)]

If the PHA determines that there is a family member who is required to fulfill a service requirement, but who has failed to comply with this obligation (noncompliant resident), the PHA must notify the tenant of this determination.

The notice to the tenant must briefly describe the noncompliance. The notice must state that the PHA will not renew the lease at the end of the twelve-month lease term unless the tenant, and any other noncompliant resident, enter into a written agreement with the PHA to cure the noncompliance, or the family provides written assurance satisfactory to the PHA that the tenant or other noncompliant resident no longer resides in the unit.

The notice must also state that the tenant may request a grievance hearing on the PHA's determination, in accordance with the PHA's grievance procedures, and that the tenant may exercise any available judicial remedy to seek timely redress for the PHA's nonrenewal of the lease because of the PHA's determination.

SFHA Policy

The notice of initial noncompliance will be sent at least 45 days prior to the end of the lease term.

The family will have 10 business days from the date of the notice of noncompliance to enter into a written agreement to cure the noncompliance over the 12 month term of the new lease, provide documentation that the noncompliant resident no longer resides in the unit, or to request a grievance hearing.

If the family reports that a noncompliant family member is no longer residing in the unit, the family must provide documentation that the family member has actually vacated the unit before the PHA will agree to continued occupancy of the family. Documentation must consist of a certification signed by the head of household as well as evidence of the current address of the family member that previously resided with them.

If the family does not request a grievance hearing, or does not take either corrective action required by the notice of noncompliance within the required 10 business day timeframe, the PHA will terminate tenancy in accordance with the policies in Section 13-IV.D.

Continued Noncompliance [24 CFR 960.607(b)]

If, after the 12 month cure period, the family member is still not compliant, the PHA must terminate tenancy of the entire family, according to the PHA's lease, unless the family provides documentation that the noncompliant resident no longer resides in the unit.

SFHA Policy

Notices of continued noncompliance will be sent at least 30 days prior to the end of the lease term and will also serve as the family's termination notice. The notice will meet the requirements for termination notices described in Section 13-IV.D, Form, Delivery, and Content of the Notice.

The family will have 10 business days from the date of the notice of non-compliance to provide documentation that the noncompliant resident no longer resides in the unit, or to request a grievance hearing.

If the family reports that a noncompliant family member is no longer residing in the unit, the family must provide documentation that the family member has actually vacated the unit before the PHA will agree to continued occupancy of the family. Documentation must consist of a certification signed by the head of household as well as evidence of the current address of the noncompliant family member that previously resided with them.

If the family does not request a grievance hearing, or provide such documentation within the required 10 business day timeframe, the family's lease and tenancy will automatically terminate at the end of the current lease term without further notice.

Enforcement Documentation [Notice PIH 2009-48]

PHAs are required to initiate due process (see 24 CFR 966.53(c)) against households failing to comply with lease requirements including the community service and self-sufficiency requirement.

When initiating due process, the PHA must take the following procedural safeguards:

- Adequate notice to the tenant of the grounds for terminating the tenancy and for eviction
- Right of the tenant to be represented by counsel
- Opportunity for the tenant to refute the evidence presented by the PHA, including the right to confront and cross-examine witnesses and present any affirmative legal or equitable defense which the tenant may have
- A decision on merits

PART II

IMPLEMENTATION OF COMMUNITY SERVICE

11-II.A. OVERVIEW

Each PHA must develop a policy for administration of the community service and economic self-sufficiency requirements for public housing. It is in the PHA's best interests to develop a viable, effective community service program, to provide residents the opportunity to engage in the community and to develop competencies.

PHA Implementation of Community Service

The PHA may not substitute any community service or self-sufficiency activities performed by residents for work ordinarily performed by PHA employees, or replace a job at any location where residents perform activities to satisfy the service requirement [24 CFR 960.609].

SFHA Policy

The PHA will notify its insurance company if residents will be performing community service at the PHA. In addition, the PHA will ensure that the conditions under which the work is to be performed are not hazardous.

If a disabled resident certifies that s/he is able to perform community service, the PHA will ensure that requests for reasonable accommodation are handled in accordance with the policies in Chapter 2.

PHA Program Design

The PHA may administer qualifying community service or economic self-sufficiency activities directly, or may make community service activities available through a contractor, or through partnerships with qualified organizations, including resident organizations, and community agencies or institutions [24 CFR 960.605(b)].

SFHA Policy

The PHA will attempt to provide the broadest choice possible to residents as they choose community service activities.

The PHA's goal is to design a service program that gives residents viable opportunities to become involved in the community and to gain competencies and skills. The PHA will work with resident organizations and community organizations to design, implement, assess and recalibrate its community service program.

The PHA will make every effort to identify volunteer opportunities throughout the community, especially those in proximity to public housing developments. To the greatest extent possible, the PHA will provide names and contacts at agencies that can provide opportunities for residents, including persons with disabilities, to fulfill their community service obligations.

Any written agreements or partnerships with contractors and/or qualified organizations, including resident organizations, are described in the PHA Plan.

The PHA will provide in-house opportunities for volunteer work or self-sufficiency programs when possible.

When the PHA has a ROSS program, a ROSS Service Coordinator, or an FSS program, the PHA will coordinate individual training and service plans (ITSPs) with the community service requirement. Regular meetings with PHA coordinators will satisfy community service activities and PHA coordinators will verify community service hours within individual monthly logs.

EXHIBIT 11-1: COMMUNITY SERVICE AND SELF-SUFFICIENCY POLICY
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A. Background

The Quality Housing and Work Responsibility Act of 1998 requires that all nonexempt (see definitions) public housing adult residents (18 or older) contribute eight (8) hours per month of community service (volunteer work) or participate in eight (8) hours of training, counseling, classes or other activities that help an individual toward self-sufficiency and economic independence. This is a requirement of the public housing lease.

B. Definitions

Community Service – community service activities include, but are not limited to, work at:

- Local public or nonprofit institutions such as schools, head start programs, before or after school programs, child care centers, hospitals, clinics, hospices, nursing homes, recreation centers, senior centers, adult day care programs, homeless shelters, feeding programs, food banks (distributing either donated or commodity foods), or clothes closets (distributing donated clothing)
- Nonprofit organizations serving PHA residents or their children such as: Boy or Girl Scouts, Boys or Girls Club, 4-H clubs, Police Assistance League (PAL), organized children's recreation, mentoring or education programs, Big Brothers or Big Sisters, garden centers, community clean-up programs, beautification programs
- Programs funded under the Older Americans Act, such as Green Thumb, Service Corps of Retired Executives, senior meals programs, senior centers, Meals on Wheels
- Public or nonprofit organizations dedicated to seniors, youth, children, residents, citizens, special-needs populations or with missions to enhance the environment, historic resources, cultural identities, neighborhoods, or performing arts
- PHA housing to improve grounds or provide gardens (so long as such work does not alter the PHA's insurance coverage); or work through resident organizations to help other residents with problems, including serving on the Resident Advisory Board
- Care for the children of other residents so parent may volunteer

Note: Political activity is excluded.

Self-Sufficiency Activities – self-sufficiency activities include, but are not limited to:

- Job readiness or job training
- Training programs through local one-stop career centers, workforce investment boards (local entities administered through the U.S. Department of Labor), or other training providers
- Employment counseling, work placement, or basic skills training
- Education, including higher education (junior college or college), GED classes, or reading, financial, or computer literacy classes
- Apprenticeships (formal or informal)
- English proficiency or English as a second language classes
- Budgeting and credit counseling
- Any activity required by the Department of Public Assistance under Temporary Assistance for Needy Families (TANF)
- Any other program necessary to ready a participant to work (such as substance abuse or mental health counseling)

Exempt Adult – an adult member of the family who meets any of the following criteria:

- Is 62 years of age or older
- Is blind or a person with disabilities (as defined under section 216[i][I] or 1614 of the Social Security Act), and who certifies that because of this disability he or she is unable to comply with the service provisions, or is the primary caretaker of such an individual
- Is engaged in *work activities*
- Is able to meet requirements under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of the state in which the PHA is located, including a state-administered welfare-to-work program; or
- Is a member of a family receiving assistance, benefits, or services under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of the state in which the PHA is located, including a state-administered welfare-to-work program, and has not been found by the state or other administering entity to be in noncompliance with such program.

Work Activities – as it relates to an exemption from the community service requirement, *work activities* means:

- Unsubsidized employment
- Subsidized private sector employment
- Subsidized public sector employment
- Work experience (including work associated with the refurbishing of publicly assisted housing) if sufficient private sector employment is not available
- On-the-job training
- Job search and job readiness assistance
- Community service programs
- Vocational educational training (not to exceed 12 months with respect to any individual)
- Job skills training directly related to employment
- Education directly related to employment, in the case of a recipient who has not received a high school diploma or a certificate of high school equivalency
- Satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence, in the case of a recipient who has not completed secondary school or received such a certificate
- Provision of child care services to an individual who is participating in a community service program

C. Requirements of the Program

1. The eight (8) hours per month may be either volunteer work or self-sufficiency program activity, or a combination of the two.
2. At least eight (8) hours of activity must be performed each month. An individual may not skip a month and then double up the following month, unless special circumstances warrant special consideration. The housing authority will make the determination of whether to allow or disallow a deviation from the schedule based on a family's written request.
3. Family obligation:
 - At lease execution, all adult members (18 or older) of a public housing resident family must:
 - Sign a certification (Attachment A) that they have received and read this policy and understand that if they are not exempt, failure to comply with the community service requirement will result in a nonrenewal of their lease; and
 - Declare if they are exempt. If exempt, they must complete the Exemption Form (Exhibit 11-3) and provide documentation of the exemption.
 - Upon written notice from the PHA, nonexempt family members must present complete documentation of activities performed during the applicable lease term. This documentation will include places for signatures of supervisors, instructors, or counselors, certifying to the number of hours contributed.
 - If a family member is found to be noncompliant at the end of the 12-month lease term, he or she, and the head of household, will be required to sign an agreement with the housing authority to make up the deficient hours over the next twelve (12) month period, or the lease will be terminated.
4. Change in exempt status:
 - If, during the twelve (12) month lease period, a nonexempt person becomes exempt, it is his or her responsibility to report this to the PHA and provide documentation of exempt status.
 - If, during the twelve (12) month lease period, an exempt person becomes nonexempt, it is his or her responsibility to report this to the PHA. Upon receipt of this information the PHA will provide the person with the appropriate documentation form(s) and a list of agencies in the community that provide volunteer and/or training opportunities.

D. Authority Obligation

1. To the greatest extent possible and practicable, the PHA will:
 - Provide names and contacts at agencies that can provide opportunities for residents, including residents with disabilities, to fulfill their community service obligations.
 - Provide in-house opportunities for volunteer work or self-sufficiency activities.
2. The PHA will provide the family with a copy of this policy, and all applicable exemption verification forms and community service documentation forms, at lease-up, lease renewal, when a family member becomes subject to the community service requirement during the lease term, and at any time upon the family's request.
3. Although exempt family members will be required to submit documentation to support their exemption, the PHA will verify the exemption status in accordance with its verification policies. The PHA will make the final determination as to whether or not a family member is exempt from the community service requirement. Residents may use the PHA's grievance procedure if they disagree with the PHA's determination.
4. Noncompliance of family member:
 - At least thirty (30) days prior to the end of the 12-month lease term, the PHA will begin reviewing the exempt or nonexempt status and compliance of family members;
 - The PHA will secure a certification of compliance from nonexempt family members (Attachment B).
 - If, at the end of the initial 12-month lease term under which a family member is subject to the community service requirement, the PHA finds the family member to be noncompliant, the PHA will not renew the lease unless:
 - The head of household and any other noncompliant resident enter into a written agreement with the PHA, to make up the deficient hours over the next twelve (12) month period; or
 - The family provides written documentation satisfactory to the PHA that the noncompliant family member no longer resides in the unit.
 - If, at the end of the next 12-month lease term, the family member is still not compliant, a 30-day notice to terminate the lease will be issued and the entire family will have to vacate, unless the family provides written documentation satisfactory to the PHA that the noncompliant family member no longer resides in the unit;
 - The family may use the PHA's grievance procedure to dispute the lease termination.

All adult family members must sign and date below, certifying that they have read and received a copy of this Community Service and Self-Sufficiency Policy.

Resident

Date

Resident

Date

Resident

Date

Resident

Date

<p>EXHIBIT 11-2: DEFINITION OF A PERSON WITH A DISABILITY UNDER SOCIAL SECURITY ACTS 216(i)(1) and Section 1416(excerpt) FOR PURPOSES OF EXEMPTION FROM COMMUNITY SERVICE</p>
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Social Security Act:

216(i)(1): Except for purposes of sections 202(d), 202(e), 202(f), 223, and 225, the term “disability” means (A) inability to engage in any substantial gainful activity by reason of any medically determinable physical or mental impairment which can be expected to result in death or has lasted or can be expected to last for a continuous period of not less than 12 months, or (B) blindness; and the term “blindness” means central visual acuity of 20/200 or less in the better eye with the use of a correcting lens. An eye which is accompanied by a limitation in the fields of vision such that the widest diameter of the visual field subtends an angle no greater than 20 degrees shall be considered for purposes of this paragraph as having a central visual acuity of 20/200 or less.

Section 1416 (excerpt):

SEC. 1614. [42 U.S.C. 1382c] (a)(1) For purposes of this title, the term “aged, blind, or disabled individual” means an individual who—

(A) is 65 years of age or older, is blind (as determined under paragraph (2)), or is disabled (as determined under paragraph (3)), and

(B)(i) is a resident of the United States, and is either (I) a citizen or (II) an alien lawfully admitted for permanent residence or otherwise permanently residing in the United States under color of law (including any alien who is lawfully present in the United States as a result of the application of the provisions of section 212(d)(5) of the Immigration and Nationality Act), or

(ii) is a child who is a citizen of the United States and, who is living with a parent of the child who is a member of the Armed Forces of the United States assigned to permanent duty ashore outside the United States.

(2) An individual shall be considered to be blind for purposes of this title if he has central visual acuity of 20/200 or less in the better eye with the use of a correcting lens. An eye which is accompanied by a limitation in the fields of vision such that the widest diameter of the visual field subtends an angle no greater than 20 degrees shall be considered for purposes of the first sentence of this subsection as having a central visual acuity of 20/200 or less. An individual shall also be considered to be blind for purposes of this title if he is blind as defined under a State plan approved under title X or XVI as in effect for October 1972 and received aid under such plan (on the basis of blindness) for December 1973, so long as he is continuously blind as so defined.

(3)(A) Except as provided in subparagraph (C), an individual shall be considered to be disabled for purposes of this title if he is unable to engage in any substantial gainful activity by reason of any medically determinable physical or mental impairment which can be expected to result in death or which has lasted or can be expected to last for a continuous period of not less than twelve months.

EXHIBIT 11-3: PHA DETERMINATION OF EXEMPTION FOR COMMUNITY SERVICE

Family: _____

Adult family member: _____

This adult family member meets the requirements for being exempted from the PHA’s community service requirement for the following reason:

- 62 years of age or older (*Documentation of age in file*)
- Is a person with disabilities and self-certifies below that he or she is unable to comply with the community service requirement (*Documentation of HUD definition of disability in file*)

Tenant certification: I am a person with disabilities and am unable to comply with the community service requirement.

Signature of Family Member _____
Date

- Is the primary caretaker of such an individual in the above category. (*Documentation in file*)
- Is engaged in work activities (*Verification in file*)
- Is able to meet requirements under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of the state in which the PHA is located, including a state-administered welfare-to-work program (*Documentation in file*)
- Is a member of a family receiving assistance, benefits, or services under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of the state in which the PHA is located, including a state-administered welfare-to-work program, and has not been found by the state or other administering entity to be in noncompliance with such program (*Documentation in file*)

Signature of Family Member _____
Date

Signature of PHA Official _____
Date

Chapter 12

TRANSFER POLICY

INTRODUCTION

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

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

Part I: Transfers. This part provides an overview of Transfers..

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

Part III: Non-Emergency Transfers. This part describes types of transfers that may be required by the PHA, requested by the residents, eligibility requirements, and processing.

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

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

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

PART I: TRANSFERS

12-I.A. OVERVIEW

The PHA does not transfer any family to any particular apartment, community, neighborhood or development because of race, color, sex, religion (creed), disability, familial status, national origin, ancestry, sexual orientation, marital status, source of income, or age.

Site managers shall administer occupancy transfers in such a manner as to minimize vacancy loss, minimize the time families are over housed or under housed (as determined under the PHA's occupancy guidelines), and still provide housing opportunities for new admissions.

Transfers, whether to a PHA owned unit or to non-PHA owned accommodations, shall not be deemed to waive an existing breach of the Rental Agreement by the Resident; and the PHA may pursue, or continue to pursue, any legal action and remedy against the Resident as if no transfer had been made.

12-I.B. TYPES OF TRANSFERS

There are two types of transfers, Emergency and Non-Emergency. Depending on the reasons for transfer, each transfer may also be required or requested.

12-I.C. HANDLING OF REQUESTS

SFHA Policy

Eligibilities for transfers are specified in the corresponding sections.

The Transfer Coordinator will determine the appropriate category of transfer and render a decision within fourteen (14) business days of its receipt. Each transfer category requires specific documentation to meet specific eligibility criteria.

The Transfer Coordinator will document notification and will place the applicant on the appropriate Transfer Waiting List. Applicants will be placed on the appropriate Transfer Waiting List when documentation and eligibility criteria are met. Once the applicant is on the appropriate Transfer Waiting List, the Transfer Coordinator will send a status letter to the family (confirmation of Transfer Waiting Lists placement & number).

If the Transfer Coordinator does not approve the transfer request, the family will be informed in writing of the specific reason(s) and provided the opportunity to appeal the decision. Appeals must be initiated with the Transfer Coordinator within 14-business days from receipt of notice. If the SFHA upholds its decision to deny the transfer request, the resident has the right to request a Fair Hearing as outlined in the *Grievance Policy* located in Chapter 14 of this ACOP.

PART II: EMERGENCY TRANSFERS

12-II.A. EMERGENCY TRANSFERS

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

Maintenance Conditions

Maintenance conditions in the resident's unit, building or at the site that pose an immediate, verifiable threat to the life, health or safety of the resident or family members that cannot be repaired or abated within 24 hours, make the unit uninhabitable and were not caused by the resident family or their guest. Examples of an uninhabitable unit may include a unit affected by a flood, fire, and natural disaster.

Verified Medical Condition

To alleviate a doctor verified medical condition which is imminently life threatening or seriously impairs the health of the Resident or a Household Member (i.e. lead poisoning or amputation); or

Threat of Real and Imminent Criminal Attack

To protect a Resident or a Household Member from a factually verifiable or documented threat of real and imminent criminal attack that is specifically directed towards that Resident, Household Member or other occupant of the Residence. In making such a determination, the Executive Director or designee may consider facts and circumstances including, but not limited to, recommendations by the District Attorney or a sworn peace officer with a rank equivalent to an SFPD Detective II or higher attesting to the factual need for a transfer.

Civil Rights Violation: Pattern of Physical and/or Extreme or Repeated Verbal Harrassment

An SFHA tenant who is the victim of physical harassment and/or extreme or repeated verbal harassment, which cannot be remedied in other ways, such as by SFHA, eviction of the people responsible for harassment or other action, may qualify for a transfer to another unit within the development or to another SFHA development, or other appropriate subsidized housing program.

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

An emergency transfer is a transfer determined at the sole discretion of the Executive Director,

or his/her designee and will be reviewed on a case by case basis.

12-II.B. REQUEST AND APPROVAL OF EMERGENCY TRANSFERS

SFHA Policy

Except as provide below, all emergency transfer requests made by or on behalf of a Resident and all law enforcement recommendations shall be made in writing and submitted to the Property Office or Transfer Coordinator. Upon receipt of a request and all other required documentation, the PHA employee in receipt of the request shall immediately forward the relevant paperwork to the Executive Director or his/her designee for a decision.

In cases of extreme emergency, verbal requests, verbal recommendations and the verbal rendering of facts may be made directly to the Executive Director or his/her designee by law enforcement upon which the Executive Director or his/her designee may act, provided that verbal assurances from law enforcement that all written documentation supporting the transfer will be submitted within 48 hours.

12-II.C. EMERGENCY TRANSFER LOCATIONS

SFHA Policy

The PHA shall have sole discretion in determining whether an emergency transfer shall be a temporary housing accommodation and whether the transfer is permanent.

12-II.D. EMERGENCY TRANSFER PLACEMENT

SFHA Policy

Emergency transfers have priority over all other transfers. Those approved for an emergency transfer shall be concurrently offered three units, if available, of suitable bedroom size at three different developments. The developments containing the units offered, shall be those with the most vacancies that meet the family's bedroom requirements, except units within the development that the family currently occupies shall not be offered or counted as being offered. The family will have no more than three business days to inspect the units and accept an offer. Should the family fail to affirmatively accept one of the three offers, the Resident will be deemed to have rejected all offers and the PHA shall have no further obligation to offer additional units.

12-II.E. EMERGENCY CAUSED BY RESIDENT, HOUSEHOLD MEMBER, OR GUEST OF RESIDENT'S FAMILY

If the PHA determines that the Resident, Household Member, or a guest of the Resident's family created or caused the emergency, the Resident shall reimburse the PHA for any and all costs connected with the move.

PART III: NON-EMERGENCY TRANSFERS

12-III.A. OVERVIEW

HUD regulations regarding transfers are minimal, leaving it up to the PHA to develop reasonable transfer policies. The only requests that SFHA is required to consider are requests for reasonable accommodation. All other transfer requests are at the discretion of SFHA.

SFHA Policy

A non-emergency transfer is any transfer other than an emergency transfer, and which the Rental Agreement and this policy authorize. There are two categories of non-emergency transfers:

Administrative Non-Emergency Transfers:

Required by the PHA to adjust unit occupancy in accordance with the PHA's Occupancy Guidelines;

Required due to an approved reasonable accommodation request;

Required by the PHA due to proposed demolition, repair, alteration, rehabilitation or modernization of the unit;

Otherwise required by law

Standard Non-Emergency Transfers:

Requested by a Resident for employment reasons rationally related to the transfer and duly verified by the applicable Resident's or Household Member's employer;

Requested by a Resident for verified medical reasons other than those subject to the PHA's policies regarding reasonable accommodations;

Administrative Non-Emergency Transfers required by the PHA are mandatory for the tenant.

All Standard Non-Emergency Transfers will be based on unit availability.

Unless agreed to by the PHA in writing and at the time of the transfer, all non-emergency transfers shall be permanent.

12-III.B. ELIGIBILITY FOR STANDARD NON-EMERGENCY TRANSFER

The PHA may establish standards for considering a transfer request. [PH Occ GB, p. 150].

SFHA Policy

All Resident requested transfers shall be in writing and submitted to the site management office on a designated form. The PHA will accept all Standard Non-Emergency Transfer for placement on the appropriate transfer list unless the Resident:

Or any Household Member has a record of creating a nuisance, disturbing any other resident or interfering with staff;

Currently owes back rent or other charges;

Is under the threat of eviction;

Is under the initial term of a lease;

Has a poor payment record (a “poor payment record” means the Resident has failed to pay all rent on or before the fifth of each and every month or has failed to pay all charges when due); or

Has failed a housekeeping inspection.

The transfer coordinator may waive the one year residency requirement to reduce vacancies.

12-III.C. APPROVAL OF STANDARD NON-EMERGENCY TRANSFER

When the Resident reaches the top of a site transfer list, a vacancy exists at the site, and the site manager where the unit exists determines that the SFHA will fill such vacancy by a transfer, that site manager shall review the Resident’s documented tenant history only over the immediately preceding twelve months. The site manager shall approve the transfer if the Resident is eligible under the terms of this Chapter.

Should the site manager approve the transfer, the SFHA will offer the Resident the unit. If the Resident accepts the offer, the Resident will be dropped from all transfer lists. Should the Resident refuse to accept the unit the SFHA will skip over the Resident

without affecting the Resident's placement on the transfer list. However, if the Resident refuses a second offer at a different site, the resident shall be dropped from the transfer list.

If the transfer is denied, the PHA will drop the Resident from all transfer lists. Should the Resident refuse to accept the unit, the SFHA will skip over the Resident without affecting the Resident's placement on the transfer list. However, if the Resident refuses a second offer at a different site, the Resident shall be dropped from the transfer list. Within fourteen (14) business days after disapproving the transfer, the PHA shall notify the Resident in writing as to the reasons for the disapproval and the action taken. Additionally, such notice shall inform the Resident of their rights to grieve the PHA's decision in accordance with the PHA's grievance policy.

If a non-emergency resident requested transfer is approved, the resident may not request another non-emergency transfer for five years.

12-III.D. Administrative Non-Emergency Transfers:

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

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

SFHA Policy

When the Resident reaches the top of a site transfer list, a vacancy exists at the site, and the site manager at the site where the unit exists determines that the PHA will fill such vacancy by transfer, that site manager shall offer to transfer the Resident to the unit. Should the Resident refuse to transfer, the PHA will seek to terminate the Resident's tenancy in accordance with the *Rental Agreement*. The types of transfers that may be required by SFHA, include, but are limited to the following:

Transfers to Make an Accessible Unit Available

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

SFHA Policy

When a non-accessible unit becomes available, the PHA will transfer a family living in an accessible unit that does not require the accessible features, to an available unit that is

not accessible. The PHA may wait until a disabled resident requires the accessible unit before transferring the family that does not require the accessible features out of the accessible unit.

Occupancy Standards Transfers

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

SFHA Policy

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

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

Overcrowded: the number of household members exceeds the maximum number of persons allowed for the unit size in which the family resides, according to the chart in Section 5-I.B.

Over-housed: the family no longer qualifies for the bedroom size in which they are living based on the PHA's occupancy standards as described in Section 5-I.B.

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

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

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

Within thirty days of a Household Member ceasing to reside within the Residence, a Resident shall report such occurrence to the PHA.

Demolition, Disposition, Revitalization, or Rehabilitation Transfers

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

SFHA Policy

The PHA will relocate a family when the unit or site in which the family lives is undergoing major rehabilitation that requires the unit to be vacant, or the unit is being disposed of or demolished. The PHA's relocation plan may or may not require transferring affected families to other available public housing units.

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

In cases of revitalization or rehabilitation, the family may be offered a temporary relocation if allowed under Relocation Act provisions, and may be allowed to return to their unit, depending on contractual and legal obligations, once revitalization or rehabilitation is complete.

12-III.E. NON-EMERGENCY TRANSFER LIST PRIORITY AND PLACEMENTSFHA Policy

Except as required or limited by law, the priority of transfers shall be:

Those required as a result of demolition, disposition repair, alteration, rehabilitation or modernization of units and then by those requested to alleviate medical conditions.

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

Required transfers shall have priority over requested transfers.

Required transfers shall have precedence over new admissions.

Required transfers shall be placed on the transfer list in order of the date and time that Management first determines the transfer is required.

Resident requested transfers, which meet the prerequisite requirements, shall be placed on the transfer list in order of the date and time the PHA accepts the Resident's requests.

The transfer list shall be current at all times for requested and required transfers, except transfers adjusting occupancy which the PHA shall update at the time of the annual review or recertification.

Chapter 13

LEASE TERMINATIONS

INTRODUCTION

Either party in a lease agreement may terminate the lease under certain circumstances. A public housing lease is different from a private dwelling lease in that the family's rental assistance is tied to their tenancy. When the family moves from their public housing unit, they lose their rental assistance. Therefore, there are additional safeguards to protect the family's tenancy in public housing.

Likewise, there are safeguards to protect HUD's interest in the public housing program, to assure that qualified families are provided decent, safe, and sanitary housing which is in good repair. The PHA may terminate the lease because of the family's failure to comply with HUD regulations, for serious or repeated violations of the terms of the lease, and for other good cause. HUD regulations specify some reasons for which a PHA can terminate a family's lease, and give PHAs authority to determine other reasons.

When determining PHA policy on terminations, state and local landlord-tenant laws must be considered, since such laws could vary from one location to another. These variances may be either more or less restrictive than federal law or HUD regulation.

This chapter presents the policies that govern both the family's and PHA's termination of the lease. It is presented in four parts:

Part I: Termination by Tenant. This part discusses the family's voluntary termination of the lease and the requirements the PHA places upon families who wish to terminate their lease.

Part II: Termination by PHA - Mandatory. This part describes the policies that govern how, and under what circumstances, a mandatory lease termination by the PHA occurs. This part also includes nonrenewal of the lease for noncompliance with community service requirements.

Part III: Termination by PHA – Other Authorized Reasons. This part describes the PHA's options for lease termination that are not mandated by HUD regulation but for which HUD authorizes PHAs to terminate. For some of these options HUD requires the PHA to establish policies and lease provisions for termination, but termination is not mandatory. For other options the PHA has full discretion whether to consider the options as just cause to terminate as long as the PHA policies are reasonable, nondiscriminatory, and do not violate state or local landlord-tenant law. This part also discusses the alternatives that the PHA may consider in lieu of termination, and the criteria the PHA will use when deciding what actions to take.

Part IV: Notification Requirements. This part presents the federal requirements for disclosure of criminal records to the family prior to termination, the HUD requirements and PHA policies regarding the timing and content of written notices for lease termination and eviction, and notification of the post office when eviction is due to criminal activity. This part also discusses record keeping related to lease termination.

PART I: TERMINATION BY TENANT**13-I.A. TENANT CHOOSES TO TERMINATE THE LEASE [24 CFR 966.4(k)(1)(ii) and 24 CFR 966.4(l)(1)]**

The family may terminate the lease at any time, for any reason, by following the notification procedures as outlined in the lease. Such notice must be in writing and delivered to the project office or the PHA central office or sent by pre-paid first-class mail, properly addressed.

SFHA Policy

If a family desires to move and terminate their tenancy with the PHA, they must give at least 30 calendar days advance written notice to the PHA of their intent to vacate. When a family must give less than 30 days notice due to circumstances beyond their control the PHA, at its discretion, may waive the 30 day requirement.

The notice of lease termination must be signed by the head of household, spouse, or co head.

PART II: TERMINATION BY PHA – MANDATORY

13-II.A. OVERVIEW

HUD requires the PHA to terminate the lease in certain circumstances. In other circumstances HUD requires the PHA to establish provisions for lease termination, but it is still a PHA option to determine, on a case-by-case basis, whether termination is warranted. For those tenant actions or failures to act where HUD requires termination, the PHA has no such option. In those cases, the family's lease must be terminated. This part describes situations in which HUD requires the PHA to terminate the lease.

13-II.B. FAILURE TO PROVIDE CONSENT [24 CFR 960.259(a) and (b)]

The PHA must terminate the lease if any family member fails to sign and submit any consent form s/he is required to sign for any reexamination. See Chapter 7 for a complete discussion of consent requirements.

13-II.C. FAILURE TO DOCUMENT CITIZENSHIP [24 CFR 5.514(c) and (d) and 24 CFR 960.259(a)]

The PHA must terminate the lease if (1) a family fails to submit required documentation within the required timeframe concerning any family member's citizenship or immigration status; (2) a family submits evidence of citizenship and eligible immigration status in a timely manner, but United States Citizenship and Immigration Services (USCIS) primary and secondary verification does not verify eligible immigration status of the family, resulting in no eligible family members; or (3) a family member, as determined by the PHA, has knowingly permitted another individual who is not eligible for assistance to reside (on a permanent basis) in the unit. For (3), such termination must be for a period of at least 24 months. This does not apply to ineligible noncitizens already in the household where the family's assistance has been prorated.

See Chapter 7 for a complete discussion of documentation requirements.

13-II.D. FAILURE TO DISCLOSE AND DOCUMENT SOCIAL SECURITY NUMBERS [24 CFR 5.218(c), 24 CFR 960.259(a)(3), Notice PIH 2012-10]

The PHA must terminate assistance if a participant family fails to disclose the complete and accurate social security numbers of each household member and the documentation necessary to verify each social security number.

However, if the family is otherwise eligible for continued program assistance, and the PHA determines that the family's failure to meet the SSN disclosure and documentation requirements was due to circumstances that could not have been foreseen and were outside of the family's control, the PHA may defer the family's termination and provide the opportunity to comply with the requirement within a period not to exceed 90 calendar days from the date the PHA determined the family to be noncompliant.

SFHA Policy

The PHA will defer the family's termination and provide the family with the opportunity to comply with the requirement for a period of 90 calendar days for circumstances beyond the participant's control such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency, if there is a reasonable likelihood that the participant will be able to disclose an SSN by the deadline.

See Chapter 7 for a complete discussion of documentation and certification requirements.

13-II.E. FAILURE TO ACCEPT THE PHA'S OFFER OF A LEASE REVISION [24 CFR 966.4(l)(2)(ii)(E)]

The PHA must terminate the lease if the family fails to accept the PHA's offer of a lease revision to an existing lease, provided the PHA has done the following:

- The revision is on a form adopted by the PHA in accordance with 24 CFR 966.3 pertaining to requirements for notice to tenants and resident organizations and their opportunity to present comments.
- The PHA has made written notice of the offer of the revision at least 60 calendar days before the lease revision is scheduled to take effect.
- The PHA has specified in the offer a reasonable time limit within that period for acceptance by the family.

See Chapter 8 for information pertaining to PHA policies for offering lease revisions.

13-II.F. METHAMPHETAMINE CONVICTION [24 CFR 966.4(l)(5)(i)(A)]

The PHA must immediately terminate the lease if the PHA determines that any household member has ever been convicted of the manufacture or production of methamphetamine on the premises of federally-assisted housing.

See Part 13-III.B. below for the HUD definition of *premises*.

13-II.G. NONCOMPLIANCE WITH COMMUNITY SERVICE REQUIREMENTS [24 CFR 966.4(l)(2)(ii)(D), 24 CFR 960.603(b) and 24 CFR 960.607(b)(2)(ii) and (c)]

The PHA is prohibited from renewing the lease at the end of the 12 month lease term when the family fails to comply with the community service requirements as described in Chapter 11.

13-II.H. DEATH OF A SOLE FAMILY MEMBER [Notice PIH 2012-10]

The PHA must immediately terminate program assistance for deceased single member households.

PART III: TERMINATION BY PHA – OTHER AUTHORIZED REASONS

13-III.A. OVERVIEW

Besides requiring PHAs to terminate the lease under the circumstances described in Part II, HUD requires the PHA to establish provisions in the lease for termination pertaining to certain criminal activity, alcohol abuse, and certain household obligations stated in the regulations. While these provisions for lease termination must be in the lease agreement, HUD does not require PHAs to terminate for such violations in all cases. The PHA has the discretion to consider circumstances surrounding the violation or, in applicable situations, whether the offending household member has entered or completed rehabilitation, and the PHA may, as an alternative to termination, require the exclusion of the culpable household member. The PHA must make policy decisions concerning these options.

In addition, HUD authorizes PHAs to terminate the lease for other grounds, but for only those grounds that constitute serious or repeated violations of material terms of the lease or that are for other good cause. The PHA must develop policies pertaining to what constitutes serious or repeated lease violations, and other good cause, based upon the content of the PHA lease. In the development of the terms of the lease, the PHA must consider the limitations imposed by state and local landlord-tenant law, as well as HUD regulations and federal statutes. Because of variations in state and local landlord-tenant law, and because HUD affords PHAs wide discretion in some areas, a broad range of policies could be acceptable.

The PHA, with some restrictions, also has the option to terminate the tenancies of families who are over income.

The PHA may consider alternatives to termination and must establish policies describing the criteria the PHA will use when deciding what action to take, the types of evidence that will be acceptable, and the steps the PHA must take when terminating a family's lease.

13-III.B. MANDATORY LEASE PROVISIONS [24 CFR 966.4(l)(5)]

This section addresses provisions for lease termination that must be included in the lease agreement according to HUD regulations. Although the provisions are required, HUD does not require PHAs to terminate for such violations in all cases, therefore PHA policies are needed.

***Definitions* [24 CFR 5.100]**

The following definitions will be used for this and other parts of this chapter:

Covered person means a tenant, any member of the tenant's household, a guest, or another person under the tenant's control.

Dating violence is defined in section 3-III.F.

Domestic violence is defined in section 3-III.F.

Drug means a controlled substance as defined in section 102 of the Controlled Substances Act [21 U.S.C. 802].

Drug-related criminal activity means the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with the intent to manufacture, sell, distribute, or use the drug.

Guest means a person temporarily staying in the unit with the consent of a tenant or other member of the household who has express or implied authority to so consent on behalf of the tenant.

Household means the family and PHA-approved live-in aide. The term household also includes foster children and/or foster adults that have been approved to reside in the unit [HUD-50058, Instruction Booklet, p. 65].

Immediate family member is defined in section 3-III.F.

Other person under the tenant's control means that the person, although not staying as a guest in the unit, is, or was at the time of the activity in question, on the premises because of an invitation from the tenant or other member of the household who has express or implied authority to so consent on behalf of the tenant. Absent evidence to the contrary, a person temporarily and infrequently on the premises solely for legitimate commercial purposes is not *under the tenant's control*.

Premises means the building or complex or development in which the public or assisted housing dwelling unit is located, including common areas and grounds.

Stalking is defined in section 3-III.F.

Violent criminal activity means any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage.

Drug Crime On or Off the Premises [24 CFR 966.4(l)(5)(i)(B)]

The lease must provide that drug-related criminal activity engaged in, on or off, the premises by the tenant, member of the tenant's household or guest, or any such activity engaged in on the premises by any other person under the tenant's control is grounds for termination.

SFHA Policy

The PHA will terminate the lease for drug-related criminal activity engaged in on or off the premises by any tenant, member of the tenant's household or guest, and any such activity engaged in on the premises by any other person under the tenant's control.

The PHA will consider all credible evidence, including but not limited to, any record of arrests or convictions of covered persons related to the drug-related criminal activity.

In making its decision to terminate the lease, the PHA will consider alternatives as described in Section 13-III.D and other factors as described in Sections 13-III.E and 13-III.F. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate the lease.

Illegal Use of a Drug [24 CFR 966.4(l)(5)(i)(B)]

The lease must provide that a PHA may evict a family when the PHA determines that a household member is illegally using a drug or that a pattern of illegal use of a drug interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents.

SFHA Policy

The PHA will terminate the lease when the PHA determines that a household member is illegally using a drug or the PHA determines that a pattern of illegal use of a drug interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents.

A pattern of illegal drug use means more than one incident of any use of illegal drugs during the previous twelve months.

The PHA will consider all credible evidence, including but not limited to, any record of arrests or convictions of household members related to the use of illegal drugs.

In making its decision to terminate the lease, the PHA will consider alternatives as described in Section 13-III.D and other factors as described in Sections 13-III.E and 13-III.F. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate the lease.

Threat to Other Residents [24 CFR 966.4(l)(5)(ii)(A)]

The lease must provide that any criminal activity by a covered person that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents (including PHA management staff residing on the premises) or by persons residing in the immediate vicinity of the premises are grounds for termination of tenancy.

SFHA Policy

The PHA will terminate the lease when a covered person engages in any criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents (including PHA management staff residing on the premises) or by persons residing in the immediate vicinity of the premises.

Immediate vicinity means within a three-block radius of the premises.

The PHA will consider all credible evidence, including but not limited to, any record of arrests or convictions of covered persons related to the criminal activity.

In making its decision to terminate the lease, the PHA will consider alternatives as described in Section 13-III.D and other factors as described in Sections 13-III.E and 13-III.F. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate the lease.

Alcohol Abuse [24 CFR 966.4(l)(5)(vi)(A)]

PHAs must establish standards that allow termination of tenancy if the PHA determines that a household member has engaged in abuse or pattern of abuse of alcohol that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents.

SFHA Policy

The PHA will terminate the lease if the PHA determines that a household member has engaged in abuse or a pattern of abuse of alcohol that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents.

A pattern of such alcohol abuse means more than one incident of any such abuse of alcohol during the previous twelve months.

The PHA will consider all credible evidence, including but not limited to, any record of arrests or convictions of household members related to the abuse of alcohol.

In making its decision to terminate the lease, the PHA will consider alternatives as described in Section 13-III.D and other factors as described in Sections 13-III.E and 13-III.F. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate the lease.

Furnishing False or Misleading Information Concerning Illegal Drug Use or Alcohol Abuse or Rehabilitation [24 CFR 966.4(l)(5)(vi)(B)]

PHAs must establish standards that allow termination of tenancy if the PHA determines that a household member has furnished false or misleading information concerning illegal drug use, alcohol abuse, or rehabilitation of illegal drug users or alcohol abusers.

SFHA Policy

The PHA will terminate the lease if the PHA determines that a household member has furnished false or misleading information concerning illegal drug use, alcohol abuse, or rehabilitation of illegal drug users or alcohol abusers.

The PHA will consider all credible evidence, including but not limited to, any record of arrests or convictions of household members related to the use of illegal drugs or the abuse of alcohol, and any records or other documentation (or lack of records or documentation) supporting claims of rehabilitation of illegal drug users or alcohol abusers.

In making its decision to terminate the lease, the PHA will consider alternatives as described in Section 13-III.D and other factors as described in Sections 13-III.E and 13-III.F. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate the lease.

Other Serious or Repeated Violations of Material Terms of the Lease – Mandatory Lease Provisions [24 CFR 966.4(l)(2)(i) and 24 CFR 966.4(f)]

HUD regulations require certain tenant obligations to be incorporated into the lease. Violations of such regulatory obligations are considered to be serious or repeated violations of the lease and grounds for termination. Incidents of actual or threatened domestic violence, dating violence, or stalking may not be construed as serious or repeated violations of the lease by the victim or threatened victim of such violence or stalking [Pub.L. 109-162].

SFHA Policy

The PHA will terminate the lease for the following violations of tenant obligations under the lease:

Failure to make payments due under the lease, including nonpayment of rent (see Chapter 8 for details pertaining to lease requirements for payments due);

Repeated late payment of rent or other charges. Four late payments within a 12 month period shall constitute a repeated late payment.

Failure to fulfill the following household obligations:

Not to assign the lease or to sublease the dwelling unit. Subleasing includes receiving payment to cover rent and utility costs by a person living in the unit who is not listed as a family member.

Not to provide accommodations for boarders or lodgers

To use the dwelling unit solely as a private dwelling for the tenant and the tenant's household as identified in the lease, and not to use or permit its use for any other purpose

To abide by necessary and reasonable regulations promulgated by the PHA for the benefit and well-being of the housing project and the tenants which shall be posted in the property office and incorporated by reference in the lease

To comply with all obligations imposed upon tenants by applicable provisions of building and housing codes materially affecting health and safety

To keep the dwelling unit and such other areas as may be assigned to the tenant for the tenant's exclusive use in a clean and safe condition

To dispose of all ashes, garbage, rubbish, and other waste from the dwelling unit in a sanitary and safe manner

To use only in a reasonable manner all electrical, plumbing, sanitary, heating, ventilating, air-conditioning and other facilities and appurtenances including elevators

To refrain from, and to cause the household and guests to refrain from destroying, defacing, damaging, or removing any part of the dwelling unit or project

To pay reasonable charges (other than for normal wear and tear) for the repair of damages to the dwelling unit, or to the project (including damages to project

buildings, facilities or common areas) caused by the tenant, a member of the household or a guest

To act, and cause household members or guests to act, in a manner which will not disturb other residents' peaceful enjoyment of their accommodations and will be conducive to maintaining the project in a decent, safe and sanitary condition

In making its decision to terminate the lease, the PHA will consider alternatives as described in Section 13-III.D and other factors as described in Sections 13-III.E and 13-III.F. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate the lease.

13-III.C. OTHER AUTHORIZED REASONS FOR TERMINATION [24 CFR 966.4(l)(2) and (5)(ii)(B)]

HUD authorizes PHAs to terminate the lease for reasons other than those described in the previous sections. These reasons are referred to as “other good cause.”

Other Good Cause [24 CFR 966.4(l)(2)(ii)(B) and (C)]

HUD regulations state that the PHA may terminate tenancy for other good cause. The regulations provide a few examples of other good cause, but do not limit the PHA to only those examples. The Violence against Women Reauthorization Act of 2005 explicitly prohibits PHAs from considering incidents of actual or threatened domestic violence, dating violence, or stalking as “other good cause” for terminating the tenancy or occupancy rights of the victim of such violence.

SFHA Policy

The PHA will terminate the lease for the following reasons.

Fugitive Felon or Parole Violator. If a tenant is fleeing to avoid prosecution, or custody or confinement after conviction, for a crime, or attempt to commit a crime, that is a felony under the laws of the place from which the individual flees, or that, in the case of the State of New Jersey, is a high misdemeanor; or violating a condition of probation or parole imposed under federal or state law.

Persons subject to sex offender registration requirement. If any member of the household has, during their current public housing tenancy, become subject to a registration requirement under a state sex offender registration program.

Discovery after admission of facts that made the tenant ineligible

Discovery of material false statements or fraud by the tenant in connection with an application for assistance or with reexamination of income

Failure to furnish such information and certifications regarding family composition and income as may be necessary for the PHA to make determinations with respect to rent, eligibility, and the appropriateness of dwelling size

Failure to transfer to an appropriate size dwelling unit based on family composition, upon appropriate notice by the PHA that such a dwelling unit is available

Failure to permit access to the unit by the PHA after proper advance notification for the purpose of performing routine inspections and maintenance, for making improvements or repairs, or to show the dwelling unit for re-leasing, or without advance notice if there is reasonable cause to believe that an emergency exists

Failure to promptly inform the PHA of the birth, adoption or court-awarded custody of a child. In such a case, promptly means within 10 business days of the event.

Failure to abide by the provisions of the PHA pet policy

If the family has breached the terms of a repayment agreement entered into with the PHA

If a family member has violated federal, state, or local law that imposes obligations in connection with the occupancy or use of the premises.

If a household member has engaged in or threatened violent or abusive behavior toward PHA personnel.

Abusive or violent behavior towards PHA personnel includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.

Threatening refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.

In making its decision to terminate the lease, the PHA will consider alternatives as described in Section 13-III.D and other factors described in Sections 13-III.E and 13-III.F. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate the lease.

Family Absence from Unit [24 CFR 982.551(i)]

It is reasonable that the family may be absent from the public housing unit for brief periods. However, the PHA needs a policy on how long the family may be absent from the unit. Absence in this context means that no member of the family is residing in the unit.

SFHA Policy

The family must supply any information or certification requested by the PHA to verify that the family is living in the unit, or relating to family absence from the unit, including any PHA-requested information or certification on the purposes of family absences. The family must cooperate with the PHA for this purpose.

The family must promptly notify the PHA when all family members will be absent from the unit for an extended period. An extended period is defined as any period greater than 30 calendar days. In such a case promptly means within 10 business days of the start of the extended absence.

If a family is absent from the public housing unit for more than 180 consecutive days, and the family does not adequately verify that they are living in the unit, the PHA will terminate the lease for other good cause.

Abandonment. If the family appears to have vacated the unit without giving proper notice, the PHA will follow state and local landlord-tenant law pertaining to abandonment before taking possession of the unit. If necessary, the PHA will secure the unit immediately to prevent vandalism and other criminal activity.

Over-Income Families [24 CFR 960.261 and FR 11/26/04, p. 68786]

Subject to certain restrictions, HUD authorizes PHAs to evict or terminate the tenancies of families because they are over income. Unless required to do so by local law, the PHA may not evict or terminate the tenancy of a family solely because the family is over income if: (1) the family has a valid contract of participation in the Family Self-Sufficiency (FSS) program, or (2) the family is currently receiving the earned income disallowance. This rule does not require PHAs to evict over-income residents, but rather gives PHAs the discretion to do so thereby making units available for applicants who are income-eligible.

SFHA Policy

The PHA will not evict or terminate the tenancies of families solely because they are over income.

13-III.D. ALTERNATIVES TO TERMINATION OF TENANCY

Exclusion of Culpable Household Member [24 CFR 966.4(l)(5)(vii)(C)]

As an alternative to termination of the lease for criminal activity or alcohol abuse HUD provides that the PHA may consider exclusion of the culpable household member. Such an alternative can be used, by PHA policy, for any other reason where such a solution appears viable.

SFHA Policy

The PHA will consider requiring the tenant to exclude a household member in order to continue to reside in the assisted unit, where that household member has participated in or been culpable for action or failure to act that warrants termination.

As a condition of the family's continued occupancy, the head of household must certify that the culpable household member has vacated the unit and will not be permitted to visit or to stay as a guest in the assisted unit. The family must present evidence of the former household member's current address upon PHA request.

Repayment of Family Debts

SFHA Policy

If a family owes amounts to the PHA, as a condition of continued occupancy, the PHA will require the family to repay the full amount or to enter into a repayment agreement, within 30 days of receiving notice from the PHA of the amount owed. See Chapter 16 for policies on repayment agreements.

13-III.E. CRITERIA FOR DECIDING TO TERMINATE TENANCY

A PHA that has grounds to terminate a tenancy is not required to do so, except as explained in Part II of this chapter, and may consider all of the circumstances relevant to a particular case before making a decision.

Evidence [24 CFR 982.553(c)]

For criminal activity, HUD permits the PHA to terminate the lease if a *preponderance of the evidence* indicates that a household member has engaged in the activity, regardless of whether the household member has been arrested or convicted, and without satisfying the standard of proof used for a criminal conviction.

SFHA Policy

The PHA will use the concept of the preponderance of the evidence as the standard for making all termination decisions.

Preponderance of the evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not. Preponderance of the evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

Consideration of Circumstances [24 CFR 966.4(l)(5)(vii)(B)]

Although it is required that certain lease provisions exist for criminal activity and alcohol abuse, HUD provides that the PHA may consider all circumstances relevant to a particular case in order to determine whether or not to terminate the lease.

Such relevant circumstances can also be considered when terminating the lease for any other reason.

SFHA Policy

The PHA will consider the following factors before deciding whether to terminate the lease for any of the HUD required lease provisions or for any other reasons:

The seriousness of the offending action, especially with respect to how it would affect other residents

The extent of participation or culpability of the leaseholder, or other household members, in the offending action, including whether the culpable member is a minor, a person with disabilities, or (as discussed further in section 13-III.F) a victim of domestic violence, dating violence, or stalking

The effects that the eviction will have on other family members who were not involved in the action or failure to act

The effect on the community of the termination, or of the PHA's failure to terminate the tenancy

The effect of the PHA's decision on the integrity of the public housing program

The demand for housing by eligible families who will adhere to lease responsibilities

The extent to which the leaseholder has shown personal responsibility and whether they have taken all reasonable steps to prevent or mitigate the offending action

The length of time since the violation occurred, the family's recent history, and the likelihood of favorable conduct in the future

In the case of program abuse, the dollar amount of the underpaid rent and whether or not a false certification was signed by the family

Consideration of Rehabilitation [24 CFR 966.4(l)(5)(vii)(D)]

HUD authorizes PHAs to take into consideration whether a household member who had used illegal drugs or abused alcohol and is no longer engaging in such use or abuse is participating in or has successfully completed a supervised drug or alcohol rehabilitation program.

SFHA Policy

In determining whether to terminate the lease for illegal drug use or a pattern of illegal drug use, or for abuse or a pattern of abuse of alcohol, by a household member who is no longer engaging in such use or abuse, the PHA will consider whether such household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program, or has otherwise been rehabilitated successfully.

For this purpose the PHA will require the tenant to submit evidence of the household member's current participation in, or successful completion of, a supervised drug or alcohol rehabilitation program or evidence of otherwise having been rehabilitated successfully.

Reasonable Accommodation [24 CFR 966.7]

If the family includes a person with disabilities, the PHA's decision to terminate the family's lease is subject to consideration of reasonable accommodation in accordance with 24 CFR Part 8.

SFHA Policy

If a family indicates that the behavior of a family member with a disability is the reason for a proposed termination of lease, the PHA will determine whether the behavior is related to the disability. If so, upon the family's request, the PHA will determine whether alternative measures are appropriate as a reasonable accommodation. The PHA will only consider accommodations that can reasonably be expected to address the behavior that is the basis of the proposed lease termination. See Chapter 2 for a discussion of reasonable accommodation.

Nondiscrimination Limitation [24 CFR 966.4(l)(5)(vii)(F)]

The PHA's eviction actions must be consistent with fair housing and equal opportunity provisions of 24 CFR 5.105.

13-III.F. PROHIBITION AGAINST TERMINATING TENANCY OF VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, AND STALKING [24 CFR 5.2005]

The Violence against Women Reauthorization Act of 2005 (VAWA), provides that “criminal activity directly relating to domestic violence, dating violence, or stalking, engaged in by a member of a tenant’s household or any guest or other person under the tenant’s control, shall not be cause for termination of the tenancy or occupancy rights, if the tenant or immediate family member of the tenant’s family is the victim or threatened victim of that abuse.”

VAWA further provides that incidents of actual or threatened domestic violence, dating violence, or stalking may not be construed either as serious or repeated violations of the lease by the victim of such violence or as good cause for terminating the tenancy or occupancy rights of the victim of such violence.

Definitions

For the definitions of *domestic violence*, *dating violence*, *stalking*, and *immediate family member*, see section 3-III.F.

VAWA and Other Laws [24 CFR 5.2009, 24 CFR 5.2005(d)]

VAWA does not supersede any other federal, state, or local law that provides greater protection to victims of domestic violence, dating violence, or stalking.

Moreover, VAWA does not limit the PHA’s duty to honor court orders issued to protect a victim or to address the distribution of property when a family breaks up.

Limits on VAWA Protections [24 CFR 5.2005(b), 24 CFR 5.2005(e)]

While VAWA prohibits a PHA from using domestic violence, dating violence, or stalking as the cause for a termination or eviction action against a public housing tenant who is the victim of the abuse, the protections it provides are not absolute. Specifically:

- VAWA does not limit a PHA’s otherwise available authority to terminate assistance to or evict a victim for lease violations not premised on an act of domestic violence, dating violence, or stalking providing that the PHA does not subject the victim to a more demanding standard than other tenants.
- VAWA does not limit a PHA’s authority to terminate the tenancy of any public housing tenant if the PHA can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property if that tenant’s tenancy is not terminated.

SFHA Policy

In determining whether a public housing tenant who is a victim of domestic violence, dating violence, or stalking is an actual and imminent threat to other tenants or those employed at or providing service to a property, the PHA will consider the following, and any other relevant, factors:

Whether the threat is toward an employee or tenant other than the victim of domestic violence, dating violence, or stalking

Whether the threat is a physical danger beyond a speculative threat

Whether the threat is likely to happen within a short period of time

Whether the threat to other tenants or employees can be eliminated in some other way, such as by helping the victim relocate to a confidential location

If the tenant wishes to contest the PHA's determination that he or she is an actual and imminent threat to other tenants or employees, the tenant may do so as part of the grievance hearing or in a court proceeding.

Victim Notification [Notice PIH 2006-42]

VAWA requires PHAs to notify tenants of their rights under VAWA and to inform them about the existence of form HUD-50066, Certification of Domestic Violence, Dating Violence, or Stalking. (For general VAWA notification policies, see section 16-VII.) Notice PIH 2006-42 identifies two ways that a PHA may fulfill this requirement in the event of a termination or start of an eviction proceeding:

- It may enclose the form with the termination or eviction notice and direct the family to complete, sign, and return the form, if applicable, by a specified date.
- It may include language discussing the protections provided by VAWA in the termination or eviction notice and request that a tenant come to the PHA office and pick up the form if the tenant believes the VAWA protections apply.

Notice PIH 2006-42 points out that mailing the certification form in response to an incident could place the victim at risk, since the abuser may be monitoring the mail. In such cases, the notice recommends that PHAs work with tenants to make other delivery arrangements.

SFHA Policy

The PHA will follow the lease termination notice policy in section 13-IV.D. If the PHA has reason to suspect that the notice might place a victim of domestic violence at risk, it will attempt to deliver the notice by hand directly to the victim. The PHA will use the same caution if it decides to deliver VAWA information to a victim at any other time following an incident of domestic violence.

Victim Documentation [Notice PIH 2006-42]

VAWA authorizes PHAs responding to incidents of actual or threatened domestic violence, dating violence, or stalking to request in writing that a tenant complete, sign, and submit a HUD-approved certification form (form HUD-50066).

In lieu of a certification form, or in addition to the certification form, a tenant may provide one of the following:

- A federal, state, tribal, territorial, or local police or court record documenting the domestic violence, dating violence, or stalking
- Documentation signed by an employee, agent, or volunteer of a victim service provider; an attorney; or a medical professional from whom the victim has sought assistance in addressing domestic violence, dating violence, or stalking, or the effects of such abuse, in which the professional attests under penalty of perjury to the professional's belief that the incidents in question are bona fide incidents of abuse, and the victim of domestic violence, dating violence, or stalking has signed or attested to the documentation

A PHA is not required to demand that an individual produce official documentation or physical proof of an individual's status as a victim of domestic violence, dating violence, or stalking in order to receive the protections of VAWA. A PHA may, at its discretion, provide assistance to an individual based solely upon the individual's statement or other corroborating evidence.

VAWA specifies that a victim of domestic violence, dating violence, or stalking must provide documentation of abuse within 14 business days after receipt of a written request for such documentation by a PHA. If the victim does not provide the documentation within that time frame, or any extension approved by the PHA, the victim forfeits the protections against termination afforded by VAWA, and the PHA is free to evict or terminate the assistance of the victim in accordance with otherwise applicable law and lease provisions.

SFHA Policy

When a tenant family is facing lease termination because of the actions of a tenant, household member, guest, or other person under the tenant's control and a tenant or immediate family member of the tenant's family claims that she or he is the victim of such actions and that the actions are related to domestic violence, dating violence, or stalking, the PHA will request in writing that the individual submit documentation affirming that claim. The written request will include explicit instructions on where, when, and to whom the documentation must be submitted. It will also state the consequences for failure to submit the documentation by the deadline.

The documentation will consist of a completed and signed form HUD-50066, Certification of Domestic Violence, Dating Violence, or Stalking. In lieu of the certification form, the PHA will accept either of the following forms of documentation:

A police or court record documenting the actual or threatened abuse

Documentation signed by a person who has assisted the victim in addressing domestic violence, dating violence, or stalking, or the effects of such abuse. This person may be an employee, agent, or volunteer of a victim service provider; an attorney; or a medical or other knowledgeable professional. The person signing the documentation must attest under penalty of perjury to the person's belief that the incidents in question are bona fide incidents of abuse. The victim must also sign the documentation.

The PHA reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the individual will suffice.

The individual claiming victim status must submit the requested documentation within 14 business days after receipt of the PHA's written request or must request an extension within that time frame. The PHA may, at its discretion, extend the deadline for 10 business days.

If the individual provides the requested documentation within 14 business days, or any PHA-approved extension, the PHA will reconsider its termination decision in light of the documentation.

If the individual does not provide the requested documentation within 14 business days, or any PHA-approved extension, the PHA will proceed with termination of the family's lease in accordance with applicable local, state, and federal law and the policies in this ACOP.

Terminating or Evicting a Perpetrator of Domestic Violence [24 CFR 5.2005(c)]

Although VAWA provides protection from termination for victims of domestic violence, it does not provide protection for perpetrators. In fact, VAWA gives the PHA the explicit authority to bifurcate a lease, or to remove a household member from a lease, “in order to evict, remove, terminate occupancy rights, or terminate assistance to any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others, without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is also a tenant or lawful occupant.” Specific lease language affirming this authority is not necessary. Further, the authority supersedes any local, state, or other federal law to the contrary. However, if the PHA chooses to exercise this authority, it must follow any procedures prescribed by HUD or by applicable local, state, or federal law for eviction, lease termination, or termination of assistance [Pub.L. 109-271]. This means that the PHA must follow the same rules when terminating or evicting an individual as it would when terminating or evicting an entire family [3/16/07 *Federal Register* notice on the applicability of VAWA to HUD programs].

SFHA Policy

The PHA will bifurcate a family’s lease and terminate the tenancy of a family member if the PHA determines that the family member has committed criminal acts of physical violence against other family members or others. This action will not affect the tenancy or program assistance of the remaining, nonculpable family members.

In making its decision, the PHA will consider all credible evidence, including, but not limited to, a signed certification (form HUD-50066) or other documentation of abuse submitted to the PHA by the victim in accordance with this section. The PHA will also consider the factors in section 13.III.E. Upon such consideration, the PHA may, on a case-by-case basis, choose not to bifurcate the lease and terminate the tenancy of the culpable family member.

If the PHA does bifurcate the lease and terminate the tenancy of the culpable family member, it will do so in accordance with the lease, applicable law, and the policies in this ACOP. If necessary, the PHA will also take steps to ensure that the remaining family members have a safe place to live during the termination process. For example, the PHA may offer the remaining family members another public housing unit, if available; it may help them relocate to a confidential location; or it may refer them to a victim service provider or other agency with shelter facilities.

PHA Confidentiality Requirements [24 CFR 5.2007(a)(1)(v)]

All information provided to the PHA regarding domestic violence, dating violence, or stalking, including the fact that an individual is a victim of such violence or stalking, must be retained in confidence and may neither be entered into any shared data base nor provided to any related entity, except to the extent that the disclosure (a) is requested or consented to by the individual in writing, (b) is required for use in an eviction proceeding, or (c) is otherwise required by applicable law.

SFHA Policy

If disclosure is required for use in an eviction proceeding or is otherwise required by applicable law, the PHA will inform the victim before disclosure occurs so that safety risks can be identified and addressed.

PART IV: NOTIFICATION REQUIREMENTS, EVICTION PROCEDURES AND RECORD KEEPING

13-IV.A. OVERVIEW

HUD regulations specify the requirements for the notice that must be provided prior to lease termination. This part discusses those requirements and the specific requirements that precede and follow termination for certain criminal activities which are addressed in the regulations. This part also discusses specific requirements pertaining to the actual eviction of families and record keeping.

13-IV.B. CONDUCTING CRIMINAL RECORDS CHECKS [24 CFR 5.903(e)(ii) and 24 CFR 960.259]

HUD authorizes PHAs to conduct criminal records checks on public housing residents for lease enforcement and eviction. PHA policy determines when the PHA will conduct such checks.

SFHA Policy

The PHA will conduct criminal records checks when it has come to the attention of the PHA, either from local law enforcement or by other means that an individual has engaged in the destruction of property, engaged in violent activity against another person, or has interfered with the right to peaceful enjoyment of the premises of other residents. Such checks will also include sex offender registration information. In order to obtain such information, all adult household members must sign consent forms for release of criminal conviction and sex offender registration records on an annual basis.

The PHA may not pass along to the tenant the costs of a criminal records check.

13-IV.C. DISCLOSURE OF CRIMINAL RECORDS TO FAMILY [24 CFR 5.903(f), 24 CFR 5.905(d) and 24 CFR 966.4(l)(5)(iv)]

In conducting criminal records checks, if the PHA uses the authority of 24 CFR 5.903 and 5.905 to obtain such information, certain protections must be afforded the tenant before any adverse action is taken. In such cases if the PHA obtains criminal records information from a state or local agency showing that a household member has been convicted of a crime, or is subject to a sex offender registration requirement, relevant to lease enforcement or eviction, the PHA must notify the household of the proposed action and must provide the subject of the record and the tenant a copy of such information, and an opportunity to dispute the accuracy and relevance of the information before an eviction or lease enforcement action is taken.

SFHA Policy

In all cases where criminal record or sex offender registration information would result in lease enforcement or eviction, the PHA will notify the household in writing of the proposed adverse action and will provide the subject of the record and the tenant a copy of such information, and an opportunity to dispute the accuracy and relevance of the information before an eviction or lease enforcement action is taken.

The family will be given 10 business days from the date of the PHA notice, to dispute the accuracy and relevance of the information. If the family does not contact the PHA to dispute the information within that 10 business day period, the PHA will proceed with the termination action.

Should the tenant not exercise their right to dispute prior to any adverse action, the tenant still has the right to dispute in the grievance hearing or court trial.

13-IV.D. LEASE TERMINATION NOTICE [24 CFR 966.4(l)(3)]

Form, Delivery, and Content of the Notice

Notices of lease termination must be in writing. The notice must state the specific grounds for termination, the date the termination will take place, the resident's right to reply to the termination notice, and their right to examine PHA documents directly relevant to the termination or eviction. If the PHA does not make the documents available for examination upon request by the tenant, the PHA may not proceed with the eviction [24 CFR 996.4(m)].

When the PHA is required to offer the resident an opportunity for a grievance hearing, the notice must also inform the resident of their right to request a hearing in accordance with the PHA's grievance procedure. In these cases, the tenancy shall not terminate until the time for the tenant to request a grievance hearing has expired and the grievance procedure has been completed.

When the PHA is not required to offer the resident an opportunity for a grievance hearing because HUD has made a due process determination and the lease termination is for criminal activity that threatens health, safety or right to peaceful enjoyment or for drug-related criminal activity, the notice of lease termination must state that the tenant is not entitled to a grievance hearing on the termination. It must specify the judicial eviction procedure to be used by the PHA for eviction of the tenant, and state that HUD has determined that the eviction procedure provides the opportunity for a hearing in court that contains the basic elements of due process as defined in HUD regulations. The notice must also state whether the eviction is for a criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises of other residents or employees of the PHA, or for a drug-related criminal activity on or off the premises.

SFHA Policy

The PHA will attempt to deliver notices of lease termination directly to the tenant or an adult member of the household. (For terminations related to domestic violence, see also the policy under "Victim Notification" in section 13-III.F.) If such attempt fails, the notice will be sent by first-class mail the same day.

All notices of lease termination will include a statement of the protection against termination provided by the Violence against Women Reauthorization Act of 2005 (VAWA) for victims of domestic violence, dating violence, or stalking. They will also include a copy of form HUD-50066, Certification of Domestic Violence, Dating Violence, or Stalking. Any family member who claims that the cause for termination involves (a) criminal acts of physical violence against family members or others or (b) incidents of domestic violence, dating violence, or stalking of which a family member is the victim will be given the opportunity to provide documentation in accordance with the policies in section 13-III.F.

Timing of the Notice [24 CFR 966.4(l)(3)(i)]

The PHA must give written notice of lease termination of:

- 14 calendar days in the case of failure to pay rent
- A reasonable period of time considering the seriousness of the situation (but not to exceed 30 calendar days)

If the health or safety of other residents, PHA employees, or persons residing in the immediate vicinity of the premises is threatened

If any member of the household has engaged in any drug-related criminal activity or violent criminal activity

If any member of the household has been convicted of a felony

- 30 calendar days in any other case, except that if a state or local law allows a shorter notice period, such shorter period shall apply

SFHA Policy

The PHA will give written notice of 14 calendar days for nonpayment of rent. For all other lease terminations the PHA will give 30 days' written notice or, if state or local law allows less than 30 days, such shorter notice will be given.

The Notice to Vacate that may be required under state or local law may be combined with or run concurrently with the notice of lease termination.

Notice of Nonrenewal Due to Community Service Noncompliance [24 CFR 966.4(l)(2)(ii)(D), 24 CFR 960.603(b) and 24 CFR 960.607(b)]

When the PHA finds that a family is in noncompliance with the community service requirement, the tenant and any other noncompliant resident must be notified in writing of this determination. Notices of noncompliance will be issued in accordance with the requirements and policies in Section 11-I.E.

SFHA Policy

If after receiving a notice of initial noncompliance the family does not request a grievance hearing, or does not take either corrective action required by the notice within the required timeframe, a termination notice will be issued in accordance with the policies above.

If a family agreed to cure initial noncompliance by signing an agreement, and is still in noncompliance after being provided the 12-month opportunity to cure, the family will be issued a notice of continued noncompliance. The notice of continued noncompliance will be sent in accordance with the policies in Section 11-I.E. and will also serve as the notice of termination of tenancy.

Notice of Termination Based on Citizenship Status [24 CFR 5.514 (c) and (d)]

In cases where termination of tenancy is based on citizenship status, HUD requires the notice of termination to contain additional information. In addition to advising the family of the reasons their assistance is being terminated, the notice must also advise the family of any of the following that apply: the family's eligibility for proration of assistance, the criteria and procedures for obtaining relief under the provisions for preservation of families, the family's right to request an appeal to the USCIS of the results of secondary verification of immigration status and to submit additional documentation or a written explanation in support of the appeal, and the family's right to request an informal hearing with the PHA either upon completion of the USCIS appeal or in lieu of the USCIS appeal. Please see Chapter 14 for the PHA's informal hearing procedures.

13-IV.E. EVICTION [24 CFR 966.4(l)(4) and 966.4(m)]

Eviction notice means a notice to vacate, or a complaint or other initial pleading used under state or local law to commence an eviction action. The PHA may only evict the tenant from the unit by instituting a court action, unless the law of the jurisdiction permits eviction by administrative action, after a due process administrative hearing, and without a court determination of the rights and liabilities of the parties.

SFHA Policy

When a family does not vacate the unit after receipt of a termination notice, by the deadline given in the notice, the PHA will follow state and local landlord-tenant law in filing an eviction action with the local court that has jurisdiction in such cases.

If the eviction action is finalized in court and the family remains in occupancy beyond the deadline to vacate given by the court, the PHA will seek the assistance of the court to remove the family from the premises as per state and local law.

The PHA may not proceed with an eviction action if the PHA has not made available the documents to be used in the case against the family, and has not afforded the family the opportunity to examine and copy such documents in accordance with the provisions of 24 CFR 966.4(l)(3) and (m).

13-IV.F. NOTIFICATION TO POST OFFICE [24CFR 966.4(l)(5)(iii)(B)]

When the PHA evicts an individual or family for criminal activity, including drug-related criminal activity, the PHA must notify the local post office serving the dwelling unit that the individual or family is no longer residing in the unit.

13-IV.G. RECORD KEEPING

For more information concerning general record keeping, see Chapter 16.

SFHA Policy

A written record of every termination and/or eviction will be maintained by the PHA at the development where the family was residing, and will contain the following information:

Name of resident, number and identification of unit occupied

Date of the notice of lease termination and any other notices required by state or local law; these notices may be on the same form and will run concurrently

Specific reason(s) for the notices, citing the lease section or provision that was violated, and other facts pertinent to the issuing of the notices described in detail (other than any criminal history reports obtained solely through the authorization provided in 24 CFR 5.903 and 5.905)

Date and method of notifying the resident

Summaries of any conferences held with the resident including dates, names of conference participants, and conclusions

Chapter 14

GRIEVANCES AND APPEALS

INTRODUCTION

This chapter discusses grievances and appeals pertaining to PHA actions or failures to act that adversely affect public housing applicants or residents. The policies are discussed in the following three parts:

Part I: Informal Hearings for Public Housing Applicants. This part outlines the requirements and procedures for informal hearings for public housing applicants.

Part II: Informal Hearings with Regard to Noncitizens. This part discusses informal hearings regarding citizenship status and where they differ from the requirements for general applicant and tenant grievances.

Part III: Grievance Procedures for Public Housing Residents. This part outlines the requirements and procedures for handling grievances for public housing residents.

Note that this chapter is not the PHA's grievance procedure. The grievance procedure is a document separate from the ACOP. This chapter of the ACOP provides the policies that drive the grievance procedure.

PART I: INFORMAL HEARINGS FOR PUBLIC HOUSING APPLICANTS

14-I.A. OVERVIEW

When the PHA makes a decision that has a negative impact on an applicant family, the family is often entitled to appeal the decision. For applicants, the appeal takes the form of an informal hearing. HUD regulations do not provide a structure for or requirements regarding informal hearings for applicants (except with regard to citizenship status, to be covered in Part II). This part discusses the PHA policies necessary to respond to applicant appeals through the informal hearing process.

14-I.B. INFORMAL HEARING PROCESS [24 CFR 960.208(a) and PH Occ GB, p. 58]

Informal hearings are provided for public housing applicants. An applicant is someone who has applied for admission to the conventional public housing program, but is not yet a tenant in the program. Informal hearings are intended to provide a means for an applicant to dispute a determination of ineligibility for admission to a project [24 CFR 960.208(a)]. Applicants to public housing are not entitled to the same hearing process afforded tenants in the PHA grievance procedure [24 CFR 966.53(a) and PH Occ GB, p. 58].

Informal hearings provide the applicant a means to hear the details of the reasons for rejection, and an opportunity to present evidence to the contrary if available, and to claim mitigating circumstances if possible.

Use of Informal Hearing Process

The PHA must offer the opportunity of an informal hearing to applicants who have been determined as ineligible for admission.

SFHA Policy

The PHA will only offer informal hearings to applicants for the purpose of disputing denials of admission.

The request for hearing must be presented, in writing, within fifteen (15) business days after the PHA makes the decision to deny applicant admission. The applicant must include the address where applicant would like Notice of the Hearing to be delivered. Otherwise, the Notice of Hearing will be delivered to the last known address in the PHA's database.

The Informal Hearing will be conducted within fifteen (15) business days following receipt of the request.

Notice of Denial [24 CFR 960.208(a)]

The PHA must give an applicant prompt notice of a decision denying eligibility for admission. The notice must contain a brief statement of the reasons for the PHA decision, and must also state that the applicant may request an informal hearing to dispute the decision. The notice must describe how to obtain the informal hearing.

Prior to notification of denial based on information obtained from criminal or sex offender registration records, the family, in some cases, must be given the opportunity to dispute the

information in those records which would be the basis of the denial. See Section 3-III.G for details concerning this requirement.

Scheduling an Informal Hearing

SFHA Policy

A request for an informal hearing must be made in writing and delivered to the PHA either in person or by first class mail, by the close of the business day, no later than 15 business days from the date of the PHA's notification of denial of admission.

Except as provided in Section 3-III.F, the PHA will schedule and send written notice of the informal hearing within 15 business days of the family's request.

Conducting an Informal Hearing [PH Occ GB, p. 58]

SFHA Policy

The informal hearing will be conducted by a person other than the one who made the decision under review, or a subordinate of this person.

The applicant will be provided an opportunity to present written or oral objections to the decision of the PHA.

The person conducting the informal hearing will make a recommendation regarding the applicant's eligibility for admission. The PHA is responsible for making the final decision as to whether admission should be granted or denied.

If the applicant fails to appear for their informal hearing, the applicant will have one opportunity to reschedule within 15 business days of the original hearing date. If the applicant misses the re-scheduled hearing, the denial of admission will stand and the family will be so notified.

Informal Hearing Decision [PH Occ GB, p. 58]

SFHA Policy

The PHA will notify the applicant of the PHA's final decision, including a brief statement of the reasons for the final decision.

In rendering a decision, the PHA will evaluate the following matters:

Whether or not the grounds for denial were stated factually in the notice

The validity of grounds for denial of admission. If the grounds for denial are not specified in the regulations or in PHA policy, then the decision to deny assistance will be overturned. See Chapter 3 for a detailed discussion of the grounds for applicant denial.

The validity of the evidence. The PHA will evaluate whether the facts presented prove the grounds for denial of admission. If the facts prove that there are grounds for denial, and the denial is required by HUD, the PHA will uphold the decision to deny admission.

If the facts prove the grounds for denial, and the denial is discretionary, the PHA will consider the recommendation of the person conducting the informal hearing in making the final decision whether to deny admission.

The PHA will notify the applicant of the final decision, including a statement explaining the reason(s) for the decision. The notice will be mailed by U.S postal mail within 15 business days of the informal hearing, to the applicant and his or her representative, if any.

If the informal hearing decision overturns the denial, processing for admission will resume.

Reasonable Accommodation for Persons with Disabilities [24 CFR 966.7]

Persons with disabilities may request reasonable accommodations to participate in the informal hearing process and the PHA must consider such accommodations. The PHA must also consider reasonable accommodation requests pertaining to the reasons for denial if related to the person's disability. See Chapter 2 for more detail pertaining to reasonable accommodation requests.

PART II: INFORMAL HEARINGS WITH REGARD TO NONCITIZENS

14-II.A. HEARING AND APPEAL PROVISIONS FOR NONCITIZENS [24 CFR 5.514]

Denial or termination of assistance based on immigration status is subject to special hearing and notice rules. These special hearings are referred to in the regulations as informal hearings, but the requirements for such hearings are different from the informal hearings used to deny applicants for reasons other than immigration status.

Assistance to a family may not be delayed, denied, or terminated on the basis of immigration status at any time prior to a decision under the United States Citizenship and Immigration Services (USCIS) appeal process. Assistance to a family may not be terminated or denied while the PHA hearing is pending, but assistance to an applicant may be delayed pending the completion of the informal hearing.

A decision against a family member, issued in accordance with the USCIS appeal process or the PHA informal hearing process, does not preclude the family from exercising the right, that may otherwise be available, to seek redress directly through judicial procedures.

Notice of Denial or Termination of Assistance [24 CFR 5.514(d)]

As discussed in Chapters 3 and 13, the notice of denial or termination of assistance for noncitizens must advise the family of any of the following that apply:

- That financial assistance will be denied or terminated, and provide a brief explanation of the reasons for the proposed denial or termination of assistance.
- The family may be eligible for proration of assistance.
- In the case of a tenant, the criteria and procedures for obtaining relief under the provisions for preservation of families [24 CFR 5.514 and 5.518].
- That the family has a right to request an appeal to the USCIS of the results of secondary verification of immigration status and to submit additional documentation or explanation in support of the appeal.
- That the family has a right to request an informal hearing with the PHA either upon completion of the USCIS appeal or in lieu of the USCIS appeal.
- For applicants, assistance may not be delayed until the conclusion of the USCIS appeal process, but assistance may be delayed during the period of the informal hearing process.

United States Citizenship and Immigration Services Appeal Process [24 CFR 5.514(e)]

When the PHA receives notification that the USCIS secondary verification failed to confirm eligible immigration status, the PHA must notify the family of the results of the USCIS verification. The family will have 30 calendar days from the date of the notification to request an appeal of the USCIS results. The request for appeal must be made by the family in writing directly to the USCIS. The family must provide the PHA with a copy of the written request for appeal and proof of mailing.

SFHA Policy

The PHA will notify the family in writing of the results of the USCIS secondary verification within 15 business days of receiving the results.

The family must provide the PHA with a copy of the written request for appeal and proof of mailing within 15 business days of sending the request to the USCIS.

The family must forward to the designated USCIS office any additional documentation or written explanation in support of the appeal. This material must include a copy of the USCIS document verification request (used to process the secondary request) or such other form specified by the USCIS, and a letter indicating that the family is requesting an appeal of the USCIS immigration status verification results.

The USCIS will notify the family, with a copy to the PHA, of its decision. When the USCIS notifies the PHA of the decision, the PHA must notify the family of its right to request an informal hearing.

SFHA Policy

The PHA will send written notice to the family of its right to request an informal hearing within 15 business days of receiving notice of the USCIS decision regarding the family's immigration status.

Informal Hearing Procedures for Applicants [24 CFR 5.514(f)]

After notification of the USCIS decision on appeal, or in lieu of an appeal to the USCIS, an applicant family may request that the PHA provide a hearing. The request for a hearing must be made either within 30 days of receipt of the PHA notice of denial, or within 30 days of receipt of the USCIS appeal decision.

The informal hearing procedures for applicant families are described below.

Informal Hearing Officer

The PHA must provide an informal hearing before an impartial individual, other than a person who made or approved the decision under review, and other than a person who is a subordinate of the person who made or approved the decision.

Evidence

The family must be provided the opportunity to examine and copy at the family's expense, at a reasonable time in advance of the hearing, any documents in the possession of the PHA pertaining to the family's eligibility status, or in the possession of the USCIS (as permitted by USCIS requirements), including any records and regulations that may be relevant to the hearing.

SFHA Policy

The family will be allowed to copy any documents related to the hearing at a cost of \$.25 per page. The family must request discovery of PHA documents no later than 12:00 p.m. on the business day prior to the hearing.

The family must be provided the opportunity to present evidence and arguments in support of eligible status. Evidence may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings.

The family must also be provided the opportunity to refute evidence relied upon by the PHA, and to confront and cross-examine all witnesses on whose testimony or information the PHA relies.

Representation and Interpretive Services

The family is entitled to be represented by an attorney or other designee, at the family's expense, and to have such person make statements on the family's behalf.

The family is entitled to arrange for an interpreter to attend the hearing, at the expense of the family, or the PHA, as may be agreed upon by the two parties. If the family does not arrange for their own interpreter, the PHA is still obligated to provide oral translation services in accordance with its LEP Plan.

Recording of the Hearing

The family is entitled to have the hearing recorded by a digital recorder upon request. A copy of the hearing is available on cd for \$5.00.

SFHA Policy

The PHA will not provide a transcript of an audio taped informal hearing.

Hearing Decision

The PHA must provide the family with a written notice of the final decision, based solely on the facts presented at the hearing, within 15 business days of the date of the informal hearing. The notice must state the basis for the decision.

Retention of Documents [24 CFR 5.514(h)]

The PHA must retain for a minimum of 5 years the following documents that may have been submitted to the PHA by the family, or provided to the PHA as part of the USCIS appeal or the PHA informal hearing process:

- The application for assistance
- The form completed by the family for income reexamination
- Photocopies of any original documents, including original USCIS documents
- The signed verification consent form
- The USCIS verification results
- The request for a USCIS appeal
- The final USCIS determination
- The request for an informal hearing
- The final informal hearing decision

Informal Hearing Procedures for Residents [24 CFR 5.514(f)]

After notification of the USCIS decision on appeal, or in lieu of an appeal to the USCIS, a resident family may request that the PHA provide a hearing. The request for a hearing must be made either within 30 calendar days of receipt of the PHA notice of termination, or within 30 calendar days of receipt of the USCIS appeal decision.

The informal hearing procedures for resident families whose tenancy is being terminated based on immigration status is the same as for any grievance under the grievance procedures for resident families found in Part III below.

PART III: GRIEVANCE PROCEDURES FOR PUBLIC HOUSING RESIDENTS

14-III.A. REQUIREMENTS [24 CFR 966.52]

PHAs must have a grievance procedure in place through which residents of public housing are provided an opportunity to grieve any PHA action or failure to act involving the lease or PHA policies which adversely affect their rights, duties, welfare, or status.

The PHA grievance procedure is included in the lease agreement.

SFHA Policy

The PHA must provide at least 30 calendar days notice to tenants and resident organizations setting forth proposed changes in the PHA grievance procedure, and providing an opportunity to present written comments. Comments submitted by residents must be considered by the PHA before adoption of any grievance procedure changes by the PHA.

Residents and resident organizations will have 30 calendar days from the date they are notified by the PHA of any proposed changes in the PHA grievance procedure, to submit written comments to the PHA.

14-III.B. DEFINITIONS [24 CFR 966.53; 24 CFR 966.51(a)(2)(i)]

There are several terms used by HUD with regard to public housing grievance procedures, which take on specific meanings different from their common usage. These terms are as follows:

- **Grievance** – any dispute which a tenant may have with respect to PHA action or failure to act in accordance with the individual tenant’s lease or PHA regulations which adversely affect the individual tenant’s rights, duties, welfare or status
- **Complainant** – any tenant whose grievance is presented to the PHA or at the project management office
- **Due Process Determination** – a determination by HUD that law of the jurisdiction requires that the tenant must be given the opportunity for a hearing in court which provides the basic elements of due process before eviction from the dwelling unit
- **Elements of Due Process** – an eviction action or a termination of tenancy in a state or local court in which the following procedural safeguards are required:
 - Adequate notice to the tenant of the grounds for terminating the tenancy and for eviction
 - Right of the tenant to be represented by counsel
 - Opportunity for the tenant to refute the evidence presented by the PHA including the right to confront and cross-examine witnesses and to present any affirmative legal or equitable defense which the tenant may have
 - A decision on the merits
- **Hearing Officer/Panel** – a person/panel selected in accordance with HUD regulations to hear grievances and render a decision with respect thereto

- **Tenant** – the adult person (or persons) (other than a live-in aide)
 - Who resides in the unit, and who executed the lease with the PHA as lessee of the dwelling unit, or, if no such person now resides in the unit,
 - Who resides in the unit, and who is the remaining head of household of the tenant family residing in the dwelling unit

14-III.C. APPLICABILITY [24 CFR 966.51]

Potential grievances could address most aspects of a PHA's operation. However, there are some situations for which the grievance procedure is not applicable.

The grievance procedure is applicable only to individual tenant issues relating to the PHA. It is not applicable to disputes between tenants not involving the PHA. Class grievances are not subject to the grievance procedure and the grievance procedure is not to be used as a forum for initiating or negotiating policy changes of the PHA.

If HUD has issued a due process determination, a PHA may exclude from the PHA grievance procedure any grievance concerning a termination of tenancy or eviction that involves:

- Any criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises of other residents or employees of the PHA
- Any violent or drug-related criminal activity on or off such premises
- Any criminal activity that resulted in felony conviction of a household member

In states without due process determinations, PHAs must grant opportunity for grievance hearings for all lease terminations, regardless of cause, but may use expedited grievance procedures, as described in Section 14-III.E. below, to deal with the first two of the above three categories of lease terminations.

If HUD has issued a due process determination, the PHA may evict through the state/local judicial eviction procedures. In this case, the PHA is not required to provide the opportunity for a hearing under the PHA's grievance procedure as described above.

SFHA Policy

The SFHA is located in a due process state, therefore it is not required to grant an opportunity for grievance hearings for all lease terminations, regardless of cause.

See Chapter 13 for related policies on the content of termination notices.

14-III.D. INFORMAL SETTLEMENT (HEARING) OF GRIEVANCE [24 CFR 966.54]

A grievance shall be personally presented, either orally or in writing, to the PHA office or to the office of the project in which the complainant resides so that the grievance may be discussed informally and settled without a hearing.

SFHA Policy

A request for an Informal Settlement must be presented, in writing, within ten (10) days after the SFHA makes the decision that the resident wishes to grieve. The Informal Settlement will be conducted within fifteen (15) days following receipt of the request. Grievances relating to a notice to quit must be presented within the period set forth on such notice.

If a tenant fails to attend the scheduled meeting without prior notice, the PHA will reschedule the appointment one time only if the tenant can show good cause for failing to appear, or if it is needed as a reasonable accommodation for a person with disabilities.

Good cause is defined as an unavoidable conflict which seriously affects the health, safety or welfare of the family.

HUD regulations require that a summary of such discussion will be prepared within a reasonable time and one copy will be given to the tenant and one retained in the PHA's tenant file.

The summary must specify the names of the participants, dates of meeting, the nature of the proposed disposition of the complaint and the specific reasons therefore, and will specify the procedures by which a hearing may be obtained if the complainant is not satisfied.

SFHA Policy

The PHA will prepare a summary of the informal settlement within 10 business days; one copy to be given to the tenant and one copy to be retained in the PHA's tenant file.

14-III.E. PROCEDURES TO OBTAIN A (FORMAL) HEARING [24 CFR 966.55]**Requests for Hearing and Failure to Request [24 CFR 966.55(a), (c), and (d)]**

All grievances must be presented in accordance with the informal procedures prescribed above as a condition prior to a grievance hearing. However, if the complainant can show good cause for failure to proceed with the informal settlement process to the hearing officer/panel, the hearing officer/panel may waive this provision [24 CFR 966.55(d)].

The complainant must submit the request in writing for a grievance hearing within a reasonable time after receipt of the summary of informal discussion [24 CFR 966.55(a)]. The request must specify the reasons for the grievance and the action or relief sought.

SFHA Policy

The resident must submit a written request for a (formal) grievance hearing to the PHA within ten (10) business days of the tenant's receipt of the summary of the informal settlement.

If the complainant does not request a hearing, the PHA's disposition of the grievance under the informal settlement process will become final. However, failure to request a hearing does not constitute a waiver by the complainant of the right to contest the PHA's action in disposing of the complaint in an appropriate judicial proceeding [24 CFR 966.55(c)].

Scheduling of Hearings [24 CFR 966.55(f)]

If the complainant has complied with all requirements for requesting a hearing as described above, a hearing must be scheduled by the hearing officer/panel promptly for a time and place reasonably convenient to both the complainant and the PHA. A written notification specifying the time, place and the procedures governing the hearing must be delivered to the complainant and the appropriate PHA official.

SFHA Policy

Within 15 business days of receiving a written request for a hearing, the PHA will schedule and send the written notice of the hearing to the complainant.

The PHA shall permit the tenant to reschedule a hearing one time. If the reason for rescheduling is due to a time or date conflict, the complainant must inform the PHA of a more suitable date and time frame for the rescheduled hearing. If the applicant misses the rescheduled hearing, the adverse action being grieved will stand and the family will be so notified.

The tenant may request to reschedule a hearing for good cause, or if it is needed as a reasonable accommodation for a person with disabilities. *Good cause* is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family. Requests to reschedule a hearing must be made orally or in writing prior to the hearing date. At its discretion, the PHA may request documentation of the “good cause” prior to rescheduling the hearing.

14-III.F. SELECTION OF HEARING OFFICER/PANEL [24 CFR 966.55(b)]

The grievance hearing must be conducted by an impartial person or persons appointed by the PHA, other than the person who made or approved the PHA action under review, or a subordinate of such person.

SFHA Policy

A grievance hearing shall be conducted by a single impartial hearing officer appointed by the PHA, other than the person who made or approved the PHA action under review or a subordinate of such person. A Hearing Officer will be designated by the Executive Director or his/her designee. Eligible SFHA Hearing Officers will include employees in management classifications.

Efforts will be made to assure that the person selected is not a friend, nor enemy, of the complainant and that they do not have a personal stake in the matter under dispute or will otherwise have an appearance of a lack of impartiality.

The PHA shall consult the resident organizations before PHA appointment of each hearing officer. Any comments or recommendations submitted by the tenant organizations shall be considered by the PHA before appointment.

14-III.G. PROCEDURES GOVERNING THE HEARING [24 CFR 966.56]

Rights of Complainant [24 CFR 966.56(b)]

The complainant will be afforded a fair hearing. This includes:

- The opportunity to examine before the grievance hearing any PHA documents, including records and regulations that are directly relevant to the hearing. The tenant must be allowed to copy any such document at the tenant's expense. If the PHA does not make the document available for examination upon request by the complainant, the PHA may not rely on such document at the grievance hearing unless the document is considered attorney/client privilege.

SFHA Policy

The tenant will be allowed to copy any documents related to the hearing at a cost of \$.25 per page. The family must request discovery of PHA documents no later than 12:00 p.m. on the business day prior to the hearing.

- The right to be represented by counsel or other person chosen as the tenant's representative and to have such person make statements on the tenant's behalf.

SFHA Policy

Hearings may be attended by the following applicable persons:

A PHA representative(s) and any witnesses for the PHA

The tenant and any witnesses for the tenant

The tenant's counsel or other representative

The PHA's counsel

Any other person approved by the PHA as a reasonable accommodation for a person with a disability

- The right to present evidence and arguments in support of the tenant's complaint, to controvert evidence relied on by the PHA or project management, and to confront and cross-examine all witnesses upon whose testimony or information the PHA or project management relies.
- A decision based solely and exclusively upon the facts presented at the hearing.

Decision without Hearing [24 CFR 966.56(c)]

The hearing officer/panel may render a decision without proceeding with the hearing if the hearing officer/panel determines that the issue has been previously decided in another proceeding.

Failure to Appear [24 CFR 966.56(d)]

If the complainant or the PHA fails to appear at a scheduled hearing, the hearing officer/panel may make a determination to postpone the hearing for not to exceed five business days or may make a determination that the party has waived his/her right to a hearing. Both the complainant and the PHA must be notified of the determination by the hearing officer/panel: Provided, That a determination that the complainant has waived his/her right to a hearing will not constitute a waiver of any right the complainant may have to contest the PHA's disposition of the grievance in an appropriate judicial proceeding.

There may be times when a complainant does not appear due to unforeseen circumstances which are out of their control and are no fault of their own.

SFHA Policy

If the tenant does not appear at the scheduled time of the hearing, the hearing officer will wait up to 15 minutes. If the tenant appears within 15 minutes of the scheduled time, the hearing will be held. If the tenant does not arrive within 15 minutes of the scheduled time, they will be considered to have failed to appear.

If the tenant fails to appear and was unable to reschedule the hearing in advance, the tenant must contact the PHA within 24 hours of the scheduled hearing date, excluding weekends and holidays. If the reason for rescheduling is due to a time or date conflict, the complainant must inform the PHA of a more suitable date and time frame for the hearing. If the applicant misses the rescheduled appointment, the adverse action being grieved will stand and the family will be so notified.

Good cause is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family.

General Procedures [24 CFR 966.56(e), (f), and (g)]

At the hearing, the complainant must first make a showing of an entitlement to the relief sought and thereafter the PHA must sustain the burden of justifying the PHA action or failure to act against which the complaint is directed [24 CFR 966.56(e)].

The hearing must be conducted informally by the hearing officer/panel. The PHA and the tenant must be given the opportunity to present oral or documentary evidence pertinent to the facts and issues raised by the complaint and question any witnesses. In general, all evidence is admissible and may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings [24 CFR 966.56(f)].

SFHA Policy

Any evidence to be considered by the hearing officer must be presented at the time of the hearing. There are four categories of evidence.

Oral evidence: the testimony of witnesses

Documentary evidence: a writing which is relevant to the case, for example, a letter written to the PHA. Writings include all forms of recorded communication or representation, including letters, emails, words, pictures, sounds, videotapes or symbols or combinations thereof.

Demonstrative evidence: Evidence created specifically for the hearing and presented as an illustrative aid to assist the hearing officer, such as a model, a chart or other diagram.

Real evidence: A tangible item relating directly to the case.

Hearsay Evidence is evidence of a statement that was made other than by a witness while testifying at the hearing and that is offered to prove the truth of the matter. Even though evidence, including hearsay, is generally admissible, hearsay evidence alone cannot be used as the sole basis for the hearing officer's decision.

If the PHA fails to comply with the discovery requirements (providing the tenant with the opportunity to examine PHA documents prior to the grievance hearing), the hearing officer will refuse to admit such evidence.

Other than the failure of the PHA to comply with discovery requirements, the hearing officer has the authority to overrule any objections to evidence.

The hearing officer/panel must require the PHA, the complainant, counsel and other participants or spectators to conduct themselves in an orderly fashion. Failure to comply with the directions of the hearing officer/panel to obtain order may result in exclusion from the proceedings or in a decision adverse to the interests of the disorderly party and granting or denial of the relief sought, as appropriate [24 CFR 966.56(f)].

The complainant or the PHA may arrange, in advance and at the expense of the party making the arrangement, for a transcript of the hearing. Any interested party may purchase a copy of such transcript [24 CFR 966.56(g)].

SFHA Policy

If the complainant would like the PHA to record the proceedings by digital recorder, the request must be made to the PHA by 12:00 p.m. on the business day prior to the hearing.

The family is entitled to have the hearing recorded by a digital recorder upon request. A copy of the hearing is available on cd for \$5.00.

Accommodations of Persons with Disabilities [24 CFR 966.56(h)]

The PHA must provide reasonable accommodation for persons with disabilities to participate in the hearing. Reasonable accommodation may include qualified sign language interpreters, readers, accessible locations, or attendants.

If the tenant is visually impaired, any notice to the tenant which is required in the grievance process must be in an accessible format.

See Chapter 2 for a thorough discussion of the PHA's responsibilities pertaining to reasonable accommodation.

14-III.H. DECISION OF THE HEARING OFFICER/PANEL [24 CFR 966.57]

The hearing officer must issue a written decision, stating the reasons for the decision, within a reasonable time after the hearing. Factual determinations relating to the individual circumstances of the family must be based on a preponderance of evidence presented at the hearing. A copy of the decision must be sent to the tenant and the PHA. The PHA must retain a copy of the decision in the tenant's folder. A copy of the decision, with all names and identifying references deleted, must also be maintained on file by the PHA and made available for inspection by a prospective complainant, his/her representative, or the hearing officer/panel [24 CFR 966.57(a)].

SFHA Policy

In rendering a decision, the hearing officer will consider the following matters:

PHA Notice to the Family: The hearing officer will determine if the reasons for the PHA's decision are factually stated in the notice.

Discovery: The hearing officer will determine if the family was given the opportunity to examine any relevant documents in accordance with PHA policy.

PHA Evidence to Support the PHA Decision: The evidence consists of the facts presented. Evidence is not conclusion and it is not argument. The hearing officer will evaluate the facts to determine if they support the PHA's conclusion.

Validity of Grounds for Termination of Tenancy (when applicable): The hearing officer will determine if the termination of tenancy is for one of the grounds specified in the HUD regulations and PHA policies. If the grounds for termination are not specified in the regulations or in compliance with PHA policies, then the decision of the PHA will be overturned.

The hearing officer will issue a written decision to the family and the PHA no later than ten (10) business days after the hearing. The report will contain the following information:

Hearing information:

Name of the complainant

Date, time and place of the hearing

Name of the hearing officer

Name of the PHA representative(s)

Name of family representative (if any)

Names of witnesses (if any)

Background: A brief, impartial statement of the reason for the hearing and the date(s) on which the informal settlement was held, who held it, and a summary of the results of the informal settlement. Also includes the date the complainant requested the grievance hearing.

Summary of the Evidence: The hearing officer will summarize the testimony of each witness and identify any documents that a witness produced in support of his/her testimony and that are admitted into evidence.

Findings of Fact: The hearing officer will include all findings of fact, based on a preponderance of the evidence. *Preponderance of the evidence* is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not. Preponderance of the evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

Conclusions: The hearing officer will render a conclusion derived from the facts that were found to be true by a preponderance of the evidence. The conclusion will result in a determination of whether these facts uphold the PHA's decision.

Order: The hearing report will include a statement of whether the PHA's decision is upheld or overturned. If it is overturned, the hearing officer will instruct the PHA to change the decision in accordance with the hearing officer's determination. In the case of termination of tenancy, the hearing officer will instruct the PHA to restore the family's status.

The PHA shall retain a copy of the decision in the tenant's folder (24 CFR. section 966.57(a)).

Procedures for Further Hearing

SFHA Policy

The hearing officer may ask the family for additional information and/or might adjourn the hearing in order to reconvene at a later date, before reaching a decision. If the family misses an appointment or deadline ordered by the hearing officer, the action of the PHA will take effect and another hearing will not be granted.

Final Decision [24 CFR 966.57(b)]

The decision of the hearing officer shall be binding on the PHA which shall take all actions, or refrain from any actions, necessary to carry out the decision unless the PHA Board of Commissioners determines within a reasonable time, and promptly notifies the complainant of its determination, that:

- The grievance does not concern PHA action or failure to act in accordance with or involving the complainant's lease on PHA regulations, which adversely affect the complainant's rights, duties, welfare or status;
- The decision of the hearing officer is contrary to applicable Federal, State, or local law, HUD regulations or requirements of the annual contributions contract between HUD and the PHA;

SFHA Policy

When the PHA considers the decision of the hearing officer invalid due to the reasons stated above, it will present the matter to the PHA Board of Commissioners within 10 business days

of the date of the hearing officer's decision. The Board has 30 calendar days to consider the decision. If the Board decides to reverse the hearing officer's decision, it must notify the complainant within ten (10) business days of the decision.

- A decision by the hearing officer or Board of Commissioners in favor of the PHA or which denies the relief requested by the complainant in whole or in part shall not constitute a waiver of, nor affect in any matter whatever, any rights the complainant may have to a trial de novo or judicial review in any judicial proceedings, which may thereafter be brought in the matter.

Chapter 15

PROGRAM INTEGRITY

INTRODUCTION

The PHA is committed to ensuring that funds made available to the PHA are spent in accordance with HUD requirements.

This chapter covers HUD and PHA policies designed to prevent, detect, investigate and resolve instances of program abuse or fraud. It also describes the actions that will be taken in the case of unintentional errors and omissions.

Part I: Preventing, Detecting, and Investigating Errors and Program Abuse. This part presents PHA policies related to preventing, detecting, and investigating errors and program abuse.

Part II: Corrective Measures and Penalties. This part describes the corrective measures the PHA must and may take when errors or program abuses are found.

PART I: PREVENTING, DETECTING, AND INVESTIGATING ERRORS AND PROGRAM ABUSE

15-I.A. PREVENTING ERRORS AND PROGRAM ABUSE

HUD created the Enterprise Income Verification (EIV) system to provide PHAs with a powerful tool for preventing errors and program abuse. PHAs are required to use the EIV system in its entirety in accordance with HUD administrative guidance [24 CFR 5.233]. PHAs are further required to:

- Provide applicants and residents with form HUD-52675, “Debts Owed to PHAs and Terminations”
- Require all adult members of an applicant or participant family to acknowledge receipt of form HUD-52675 by signing a copy of the form for retention in the family file

SFHA Policy

The PHA anticipates that the vast majority of families and PHA employees intend to and will comply with program requirements and make reasonable efforts to avoid errors.

To ensure that the PHA’s program is administered effectively and according to the highest ethical and legal standards, the PHA will employ a variety of techniques to ensure that both errors and intentional program abuse are rare.

The PHA will provide each applicant and resident with a copy of “Is Fraud Worth It?” (form HUD-1141-OIG), which explains the types of actions a family must avoid and the penalties for program abuse.

The PHA will provide each applicant and resident with a copy of “What You Should Know about EIV,” a guide to the Enterprise Income Verification (EIV) system published by HUD as an attachment to Notice PIH 2010-19. In addition, the PHA will require the head of each household to acknowledge receipt of the guide by signing a copy for retention in the family file.

The PHA will require mandatory orientation sessions for all prospective residents either prior to or upon execution of the lease. The PHA will discuss program compliance and integrity issues. At the conclusion of all program orientation sessions, the family representative will be required to sign a program briefing certificate to confirm that all rules and pertinent regulations were explained to them.

The PHA will routinely provide resident counseling as part of every reexamination interview in order to clarify any confusion pertaining to program rules and requirements.

PHA staff will be required to review and explain the contents of all HUD- and PHA-required forms prior to requesting family member signatures.

The PHA will place a warning statement about the penalties for fraud (as described in 18 U.S.C. 1001 and 1010) on key PHA forms and form letters that request information from a family member.

The PHA will provide each PHA employee with the necessary training on program rules and the organization's standards of conduct and ethics.

For purposes of this chapter the term *error* refers to an unintentional error or omission. *Program abuse or fraud* refers to a single act or pattern of actions that constitute a false statement, omission, or concealment of a substantial fact, made with the intent to deceive or mislead.

15-I.B. DETECTING ERRORS AND PROGRAM ABUSE

In addition to taking steps to prevent errors and program abuse, the PHA will use a variety of activities to detect errors and program abuse.

Quality Control and Analysis of Data

SFHA Policy

The PHA will employ a variety of methods to detect errors and program abuse, including:

The PHA routinely will use available sources of up-front income verification, including HUD's EIV system, to compare with family-provided information.

At each annual reexamination, current information provided by the family will be compared to information provided at the last annual reexamination to identify inconsistencies and incomplete information.

The PHA will compare family-reported income and expenditures to detect possible unreported income.

Independent Audits and HUD Monitoring

OMB Circular A-133 requires all PHAs that expend \$500,000 or more in federal awards annually to have an independent audit (IPA). In addition, HUD conducts periodic on-site and automated monitoring of PHA activities and notifies the PHA of errors and potential cases of program abuse.

SFHA Policy

The PHA will use the results reported in any IPA or HUD monitoring reports to identify potential program abuses as well as to assess the effectiveness of the PHA's error detection and abuse prevention efforts.

Individual Reporting of Possible Errors and Program Abuse

SFHA Policy

The PHA will encourage staff, residents, and the public to report possible program abuse.

15-I.C. INVESTIGATING ERRORS AND PROGRAM ABUSE

When the PHA Will Investigate

SFHA Policy

The PHA will review referrals, specific allegations, complaints, and tips from any source including other agencies, companies, and individuals, to determine if they warrant investigation. In order for the PHA to investigate, the allegation must contain at least one independently-verifiable item of information, such as the name of an employer or the name of an unauthorized household member.

The PHA will investigate inconsistent information related to the family that is identified through file reviews and the verification process.

Consent to Release of Information [24 CFR 960.259]

The PHA may investigate possible instances of error or abuse using all available PHA and public records. If necessary, the PHA will require applicant/resident families to give consent to the release of additional information.

Analysis and Findings

SFHA Policy

The PHA will base its evaluation on a preponderance of the evidence collected during its investigation.

Preponderance of the evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence that as a whole shows that the fact sought to be proved is more probable than not. Preponderance of evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

For each investigation the PHA will determine (1) whether an error or program abuse has occurred, (2) whether any amount of money is owed the PHA, and (3) what corrective measures or penalties will be assessed.

Consideration of Remedies

All errors and instances of program abuse must be corrected prospectively. Whether the PHA will enforce other corrective actions and penalties depends upon the nature of the error or program abuse.

SFHA Policy

In the case of family-caused errors or program abuse, the PHA will take into consideration (1) the seriousness of the offense and the extent of participation or culpability of individual family members, (2) any special circumstances surrounding the case, (3) any mitigating circumstances related to the disability of a family member, (4) the effects of a particular remedy on family members who were not involved in the offense.

Notice and Appeals

SFHA Policy

The PHA will inform the relevant party in writing of its findings and remedies within 30 calendar days of the conclusion of the investigation. The notice will include (1) a description of the error or program abuse, (2) the basis on which the PHA determined the error or program abuses, (3) the remedies to be employed, and (4) the family's right to appeal the results through an informal hearing or grievance hearing (see Chapter 14).

PART II: CORRECTIVE MEASURES AND PENALTIES

15-II.A. UNDER- OR OVERPAYMENT

An under- or overpayment includes an incorrect tenant rent payment by the family, or an incorrect utility reimbursement to a family.

Corrections

Whether the incorrect rental determination is an overpayment or underpayment, the PHA must promptly correct the tenant rent and any utility reimbursement prospectively.

SFHA Policy

Increases in the tenant rent will be implemented only after the family has received 30 days notice.

Any decreases in tenant rent will become effective the first of the month following the discovery of the error.

Reimbursement

Whether the family is required to reimburse the PHA or the PHA is required to credit the family depends upon which party is responsible for the error and whether the action taken was an error or program abuse. Policies regarding reimbursement are discussed in the three sections that follow.

15-II.B. FAMILY-CAUSED ERRORS AND PROGRAM ABUSE

General administrative requirements for participating in the program are discussed throughout the ACOP. This section deals specifically with errors and program abuse by family members.

An incorrect rent determination caused by a family generally would be the result of incorrect reporting of family composition, income, assets, or expenses, but also would include instances in which the family knowingly allows the PHA to use incorrect information provided by a third party.

Family Reimbursement to PHA

SFHA Policy

In the case of family-caused errors or program abuse, the family will be required to repay any amounts of rent underpaid. The PHA may, but is not required to, offer the family a repayment agreement in accordance with Chapter 16. If the family fails to repay the amount owed, the PHA will terminate the family's lease in accordance with the policies in Chapter 13.

PHA Reimbursement to Family

SFHA Policy

The PHA will not reimburse the family for any overpayment of rent when the overpayment clearly is caused by the family.

Prohibited Actions

An applicant or resident in the public housing program must not knowingly:

- Make a false statement to the PHA [Title 18 U.S.C. Section 1001].
- Provide incomplete or false information to the PHA [24 CFR 960.259(a)(4)].
- Commit fraud, or make false statements in connection with an application for assistance or with reexamination of income [24 CFR 966.4(l)(2)(iii)(C)].

SFHA Policy

Any of the following will be considered evidence of family program abuse:

Offering bribes or illegal gratuities to the PHA Board of Commissioners, employees, contractors, or other PHA representatives

Offering payments or other incentives to a third party as an inducement for the third party to make false or misleading statements to the PHA on the family's behalf

Use of a false name or the use of falsified, forged, or altered documents

Intentional misreporting of family information or circumstances (e.g., misreporting of income or family composition)

Omitted facts that were obviously known by a family member (e.g., not reporting employment income)

Admission of program abuse by an adult family member

The PHA may determine other actions to be program abuse based upon a preponderance of the evidence, as defined earlier in this chapter.

Penalties for Program Abuse

In the case of program abuse caused by a family the PHA may, at its discretion, impose any of the following remedies.

- The PHA may require the family to repay any amounts owed to the program (see 15-II.B., Family Reimbursement to PHA).
- The PHA may require, as a condition of receiving or continuing assistance, that a culpable family member not reside in the unit. See policies in Chapter 3 (for applicants) and Chapter 13 (for residents).
- The PHA may deny admission or terminate the family's lease following the policies set forth in Chapter 3 and Chapter 13 respectively.
- The PHA may refer the family for state or federal criminal prosecution as described in section 15-II.D.

15-II.C. PHA-CAUSED ERRORS OR PROGRAM ABUSE

The responsibilities and expectations of PHA staff with respect to normal program administration are discussed throughout the ACOP. This section specifically addresses actions of a PHA staff member that are considered errors or program abuse related to the public housing program. Additional standards of conduct may be provided in the PHA personnel policy.

PHA-caused incorrect rental determinations include (1) failing to correctly apply public housing rules regarding family composition, income, assets, and expenses, and (2) errors in calculation.

Repayment to the PHA

The family is not required to repay an underpayment of rent if the error or program abuse is caused by PHA staff.

PHA Reimbursement to Family

SFHA Policy

The PHA will credit a family for any family overpayment of rent, regardless of whether the overpayment was the result of staff-caused error or staff program abuse.

Prohibited Activities

SFHA Policy

Any of the following will be considered evidence of program abuse by PHA staff:

- Failing to comply with any public housing program requirements for personal gain

- Failing to comply with any public housing program requirements as a result of a conflict of interest relationship with any applicant or resident

- Seeking or accepting anything of material value from applicants, residents, vendors, contractors, or other persons who provide services or materials to the PHA

- Disclosing confidential or proprietary information to outside parties

- Gaining profit as a result of insider knowledge of PHA activities, policies, or practices

- Misappropriating or misusing public housing funds

- Destroying, concealing, removing, or inappropriately using any records related to the public housing program

- Committing any other corrupt or criminal act in connection with any federal housing program

15-II.D. CRIMINAL PROSECUTIONSFHA Policy

When the PHA determines that program abuse by a family or PHA staff member has occurred and the amount of underpaid rent meets or exceeds the threshold for prosecution under local or state law, the PHA will refer the matter to the appropriate entity for prosecution. When the amount of underpaid rent meets or exceeds the federal threshold, the case will also be referred to the HUD Office of Inspector General (OIG).

Other criminal violations related to the public housing program will be referred to the appropriate local, state, or federal entity.

15-II.E. FRAUD AND PROGRAM ABUSE RECOVERIES

PHAs who enter into a repayment agreement with a family to collect rent owed, initiate litigation against the family to recover rent owed, or begin eviction proceedings against a family may retain 100 percent of program funds that the PHA recovers [Notice PIH 2007-27 (HA)].

If the PHA does none of the above, all amounts that constitute an underpayment of rent must be returned to HUD.

The family must be afforded the opportunity for a hearing through the PHA's grievance process.

Chapter 16

PROGRAM ADMINISTRATION

INTRODUCTION

This chapter discusses administrative policies and practices that are relevant to the activities covered in this ACOP. The policies are discussed in seven parts as described below:

Part I: Setting Utility Allowances. This part describes how utility allowances are established and revised. Also discussed are the requirements to establish surcharges for excess consumption of PHA-furnished utilities.

Part II: Establishing Flat Rents and Public Housing Maximum Rents. This part describes the requirements and policies related to establishing and updating flat rent amounts and public housing maximum rents.

Part III: Repayment of Family Debts. This part contains policies for recovery of monies that have been underpaid by families, and describes the circumstances under which the PHA will offer repayment agreements to families. Also discussed are the consequences for failure to make payments in accordance with a repayment agreement.

Part IV: Public Housing Assessment System (PHAS). This part describes the PHAS indicators, how PHAs are scored under PHAS, and how those scores affect a PHA.

Part V: Record-Keeping. All aspects of the program involve certain types of record-keeping. This part outlines the privacy rights of applicants and participants and record retention policies the PHA will follow.

Part VI: Reporting and Record Keeping for Children with Environmental Intervention Blood Lead Level. This part describes the PHA's reporting responsibilities related to children with environmental intervention blood lead levels that are living in public housing.

Part VII: Notification to Applicants and Tenants regarding Protections under the Violence against Women Reauthorization Act of 2005 (VAWA). This part includes policies for notifying applicants and tenants of VAWA requirements.

Part VIII: No Smoking Policy

PART I: SETTING UTILITY ALLOWANCES [24 CFR 965 Subpart E]

16-I.A. OVERVIEW

PHAs must establish allowances for PHA-furnished utilities for all check metered utilities and for resident-purchased utilities for all utilities purchased directly by residents from a utility supplier [24 CFR 965.502(a)].

PHAs must also establish surcharges for excess consumption of PHA-furnished utilities [24 CFR 965.506].

The PHA must maintain a record that documents the basis on which utility allowances and scheduled surcharges are established and revised, and the record must be made available for inspection by residents [24 CFR 965.502(b)].

16-I.B UTILITY ALLOWANCES

The PHA must establish separate allowances for each utility and for each category of dwelling units the PHA determines to be reasonably comparable as to factors affecting utility usage [24 CFR 965.503].

The objective of a PHA in establishing utility allowances for each dwelling unit category and unit size is to approximate a reasonable consumption of utilities by an energy-conservative household of modest circumstances consistent with the requirements of a safe, sanitary, and healthful living environment [24 CFR 965.505].

Utilities include gas, electricity, and fuel for heating, water, sewerage, and solid waste disposal for a dwelling unit. In addition, if the PHA does not furnish a range and refrigerator, the family must be granted a utility allowance for the range and refrigerator they provide [24 CFR 965.505].

Costs for telephone, cable/satellite TV, and internet services are not considered utilities [PH Occ GB, p. 138].

Utility allowance amounts will vary by the rates in effect, size and type of unit, climatic location and sitting of the unit, type of construction, energy efficiency of the dwelling unit, and other factors related to the physical condition of the unit. Utility allowance amounts will also vary by residential demographic characteristics affecting home energy usage [PH Occ GB, p. 138].

Chapter 14 of the *PH Occupancy Guidebook* provides detailed guidance to the PHA about establishing utility allowances.

Utility Allowance Revisions [24 CFR 965.507]

The PHA must review at least annually the basis on which utility allowances have been established and must revise the allowances if necessary in order to adhere to the standards for establishing utility allowances that are contained in 24 CFR 965.505.

The PHA may revise its allowances for resident-purchased utilities between annual reviews if there is a rate change, and is required to do so if such change, by itself or together with prior rate changes not adjusted for, results in a change of 10 percent or more from the rate on which the allowance was based.

Adjustments to resident payments as a result of such changes must be retroactive to the first day of the month following the month in which the last rate change taken into account became effective.

SFHA Policy

Between annual reviews of utility allowances, the PHA will only revise its utility allowances due to a rate change, when required to by the regulation.

16-I.C. NOTICE REQUIREMENTS [965.502]

The PHA must give notice to all residents of proposed allowances and scheduled surcharges, and revisions thereof. The notice must be given in the manner provided in the lease and must:

- Be provided at least 60 days before the proposed effective date of the allowances, scheduled surcharges, or revisions.
- Describe the basis for determination of the allowances, scheduled surcharges, or revisions, including a statement of the specific items of equipment and function whose utility consumption requirements were included in determining the amounts of the allowances and schedule of surcharges.
- Notify residents of the place where the PHA's documentation on which allowances and surcharges are based is available for inspection.
- Provide all residents an opportunity to submit written comments during a period expiring not less than 30 days before the proposed effective date of the allowances, scheduled surcharges, or revisions.

16-I.D. REASONABLE ACCOMMODATION [24 CFR 965.508]

On request from a family that includes a disabled or elderly person, the PHA must approve a utility allowance that is higher than the applicable amount for the dwelling unit if a higher utility allowance is needed as a reasonable accommodation to make the program accessible to and usable by the family [PH Occ GB, p. 172].

Likewise, residents with disabilities may not be charged for the use of certain resident-supplied appliances if there is a verified need for special equipment because of the disability [PH Occ GB, p. 172].

See Chapter 2 for policies regarding the request and approval of reasonable accommodations.

PART II: ESTABLISHING FLAT RENTS AND PUBLIC HOUSING MAXIMUM RENTS

16-II.A. OVERVIEW

Flat rents are designed to encourage self-sufficiency and to avoid creating disincentives for continued residency by families who are attempting to become economically self-sufficient.

Public housing maximum rents are needed to prorate assistance for a mixed family. A mixed family is one whose members include those with citizenship or eligible immigration status, and those without citizenship or eligible immigrations status [24 CFR 5.504].

This part discusses how the PHA establishes and updates flat rents and public housing maximum rents. Policies related to the use of flat rents, family choice of rent, flat rent hardships, and public housing maximum rents are discussed in Chapter 6.

16-II.B. FLAT RENTS [24 CFR 960.253(b)]

Establishing Flat Rents

Flat rents for public housing units are based on the market rent charged for comparable units in the private unassisted rental market. The flat rent should be equal to the estimated rent for which the PHA could promptly lease the public housing unit after preparation for occupancy.

The PHA must use a reasonable method to determine flat rents. In determining flat rents, PHAs must consider the following:

- Location
- Quality
- Unit size
- Unit type
- Age of property
- Amenities at the property and in immediate neighborhood
- Housing services provided
- Maintenance provided by the PHA
- Utilities provided by the PHA

Review of Flat Rents

The PHA must ensure that flat rents continue to mirror market rent values [24 CFR 960.253(b)].

SFHA Policy

The PHA will review flat rents on an annual basis, and adjust them as necessary to ensure that flat rents continue to mirror market rent values.

Posting of Flat RentsSFHA Policy

The PHA will publicly post the schedule of flat rents in a conspicuous manner in the applicable PHA or project office.

Documentation of Flat Rents [24 CFR 960.253(b)(5)]

The PHA must maintain records that document the method used to determine flat rents, and that show how flat rents were determined by the PHA in accordance with this method.

16-II.C. PUBLIC HOUSING MAXIMUM RENTS

Establishing Public Housing Maximum Rents

PHAs are prohibited from making financial assistance available to persons who are not citizens or nationals of the United States, and to those who do not have eligible immigration status [24 CFR 5.500]. Therefore, in order to assist mixed families, PHAs must prorate assistance. Public housing maximum rents are needed in order to calculate the tenant rent for a mixed family.

The public housing maximum rent is based on value of the 95th percentile of the total tenant payment (TTP) for each tenant within the PHA. PHAs may calculate a maximum rent on either a PHA- or project wide basis. A separate maximum rent can be provided for each separate project or projects may be combined into logical groups, if appropriate. HUD recommends that a single project basis be avoided for a project unless at least 50 dwelling units are involved.

PHAs may use the “direct comparison” or the “unit distribution” method for establishing the public housing maximum rents for each unit size. Appendix H, of Guidebook 7465.G, Restrictions on Assistance to Noncitizens provides detailed guidance on how to establish public housing maximum rents using the methodologies identified above.

Review of Public Housing Maximum Rents

SFHA Policy

The PHA will recalculate the public housing maximum rents on an annual basis.

Posting of Public Housing Maximum Rents

SFHA Policy

The PHA will publicly post the schedule of public housing maximum rents in a conspicuous manner in the applicable PHA or project office.

Documentation of Public Housing Maximum Rents

SFHA Policy

The PHA will maintain records that document how the PHA determined the 95th percentile of TTP, whether the maximum rent was determined PHA-wide, project-wide, or with groupings of projects, and the methodology used to determine maximum rents for each unit size.

PART III: FAMILY DEBTS TO THE PHA

16-III.A. OVERVIEW

This part describes the PHA's policies for recovery of monies owed to the PHA by families.

SFHA Policy

When an action or inaction of a resident family results in the underpayment of rent or other amounts, the PHA holds the family liable to return any underpayments to the PHA.

The PHA will enter into repayment agreements in accordance with the policies contained in this part as a means to recover overpayments.

When a family refuses to repay monies owed to the PHA, the PHA will utilize other available collection alternatives including, but not limited to, the following:

- Collection agencies
- Small claims court
- Civil law suit
- State income tax set-off program

16-III.B. REPAYMENT POLICY

Family Debts to the PHA

SFHA Policy

Any amount owed to the PHA by a public housing family must be repaid. If the family is unable to repay the debt within 30 days, the PHA will offer to enter into a repayment agreement in accordance with the policies below.

If the family refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement, the PHA will terminate the family's tenancy in accordance with the policies in Chapter 13. The PHA will also pursue other modes of collection.

General Repayment Agreement Guidelines

Payment Thresholds

Notice PIH 2010-19 recommends that the total amount that a family must pay each month—the family's monthly share of rent plus the monthly debt repayment amount—should not exceed 40 percent of the family's monthly adjusted income, which is considered "affordable." Moreover, Notice PIH 2010-19 acknowledges that PHAs have the discretion to establish "thresholds and policies" for repayment agreements with families [24 CFR 982.552(c)(1)(vii)].

SFHA Policy

If a family is paying less than 40 percent of its monthly adjusted income (MAI) in rent, the minimum monthly payment amount will be the greater of the following two amounts:

The difference between 40 percent of the family's MAI and the total family share at the time the agreement is executed

\$25

If a family can provide evidence satisfactory to the PHA that a monthly payment amount of \$25 would impose an undue hardship, the PHA may, in its sole discretion, require a lower monthly payment amount.

If the family's income increases or decreases during the term of a repayment agreement, either the PHA or the family may request that the monthly payment amount be adjusted accordingly.

Execution of the AgreementSFHA Policy

Any repayment agreement between the PHA and a family must be signed and dated by the PHA and by the head of household and spouse/co head (if applicable).

Due DatesSFHA Policy

All payments are due by the close of business on the 5th day of the month. If the 5th does not fall on a business day, the due date is the close of business on the first business day after the 5th.

Late or Missed PaymentsSFHA Policy

If a payment is not received by the end of the business day on the date due, and prior approval for the missed payment has not been given by the PHA, the PHA will send the family a delinquency notice giving the family 10 business days to make the late payment. If the payment is not received by the due date of the delinquency notice, it will be considered a breach of the agreement and the PHA will terminate tenancy in accordance with the policies in Chapter 13.

If a family receives three delinquency notices for unexcused late payments in a 12-month period, the repayment agreement will be considered in default, and the PHA will terminate tenancy in accordance with the policies in Chapter 13.

No Offer of Repayment AgreementSFHA Policy

A resident may enter into a repayment agreement with their property office once every two years. If the resident completes payment of one agreement and again needs the assistance of a repayment agreement to remain in the unit, the determination shall be made by the area manager of the property whether to enter into a second repayment agreement in the course of the 24 months. The decision made by the area manager is grievable.

Repayment Agreements Involving Improper Payments

Notice PIH 2010-19 requires certain provisions to be included in any repayment agreement involving amounts owed by a family because it underreported or failed to report income:

- A reference to the items in the public housing lease that state the family's obligation to provide true and complete information at every reexamination and the grounds on which the PHA may terminate assistance because of a family's action or failure to act
- A statement clarifying that each month the family not only must pay to the PHA the monthly payment amount specified in the agreement but must also pay to the owner the family's monthly share of the rent to owner

- A statement that the terms of the repayment agreement may be renegotiated if the family's income decreases or increases
- A statement that late or missed payments constitute default of the repayment agreement and may result in termination of tenancy

PART IV: PUBLIC HOUSING ASSESSMENT SYSTEM (PHAS)

16-IV.A. OVERVIEW

The purpose of the Public Housing Assessment System (PHAS) is to improve the delivery of services in public housing and enhance trust in the public housing system among PHAs, public housing residents, HUD and the general public by providing a management tool for effectively and fairly measuring the performance of a public housing agency in essential housing operations.

16-IV.B. PHAS INDICATORS [24 CFR 902 Subparts A, B, C, D, and E]

The table below lists each of the PHAS indicators, the points possible under each indicator, and a brief description of each indicator. A PHA's performance is based on a combination of all four indicators.

Indicator 1: Physical condition of the PHA's properties

Maximum Number of Points for this indicate is 40

- The objective of this indicator is to determine the level to which a PHA is maintaining its public housing in accordance with the standard of decent, safe, sanitary, and in good repair.
- To determine the physical condition of a PHA's properties, inspections are performed of the following five major areas of public housing: site, building exterior, building systems, dwelling units, and common areas. The inspections are performed by an independent inspector arranged by HUD, and include a statistically valid sample of the units in the PHA's public housing portfolio.
- Individual project (AMP) scores are used to determine a single score for the physical condition, financial condition, and management operations indicators. The capital fund program indicator score is entity-wide.

Indicator 2: Financial condition of a PHA

Maximum Number of Points for this indicator is 25

- The objective of this indicator is to measure the financial condition of a PHA for the purpose of evaluating whether it has sufficient financial resources and is capable of managing those financial resources effectively to support the provision of housing that is decent, safe, sanitary, and in good repair.
- A PHA's financial condition is determined by measuring the PHA's entity-wide performance in each of the following components: current ratio, number of months expendable fund balance, tenant receivable outstanding, occupancy loss, expense management/utility consumption, and net income or loss divided by the expendable fund balance.

Indicator 3: Management operations of a PHA**Maximum Number of Points for this indicator is 25**

- The objective of this indicator is to measure certain key management operations and responsibilities of a PHA for the purpose of assessing the PHA's management operations capabilities.
- A PHA's management operations are assessed based on the following sub-indicators: vacant unit turnaround time, capital fund, work orders, PHA annual inspection of units and systems, security, and economic self-sufficiency.

Indicator 4: Capital Fund for a PHA**Maximum Number of Points for this indicator is 10**

- The objective of this indicator is to examine the period of time it takes a PHA to obligate capital fund program and to occupy units:
 - To ensure that the PHA obligates 90% or more of its funds as quickly as possible, but no later than 2 years after funds become available.
 - To modernize/develop public housing units and improve overall occupancy.
- The capital fund program indicator is required by statute to be measured at the PHA level. Therefore, this indicator applies on a PHA-wide basis and not to individual projects.
- Funds from the capital fund program under this section do not include HOPE VI program funds.
- Does not apply for PHAs that choose not to participate in the capital fund program of the 1937 Act.

16-IV.C. PHAS SCORING [24 CFR 902.63 and 902.67]

- HUD’s Real Estate Assessment Center (REAC) issues overall PHAS scores, which are based on the scores of the four PHAS indicators, and the components under each indicator. PHAS scores translate into a designation for each PHA as high performing, standard, substandard or troubled. PHAs are graded as high, standard, substandard, or troubled performers, as follows:

SCORE	STATUS
90% to 100%	High performer
60% to 89%	Standard
At least 60% overall, but less than 60% under physical, financial or management indicators	Substandard
0% to 59%, or less than 50% under capital fund	Troubled

These designations can affect a PHA in several ways:

- High-performing PHAs are eligible for incentives including relief from specific HUD requirements and bonus points in funding competitions [24 CFR 902.71].
- PHAs that are standard performers may be required to submit an improvement plan to eliminate deficiencies in the PHA’s performance [24 CFR 902.73(a)].
- PHAs with an overall rating of “troubled” are subject to additional HUD oversight, and are required to enter into a memorandum of agreement (MOA) with HUD to improve PHA performance [24 CFR 902.75].
- PHAs that fail to execute or meet MOA requirements may be referred to the Departmental Enforcement Center [24 CFR 902.77].

PHAs must post a notice of its final PHAS score and status in appropriate conspicuous and accessible locations in its offices within two weeks of receipt of its final score and status.

PART V: RECORD KEEPING

16-V.A. OVERVIEW

The PHA must maintain complete and accurate accounts and other records for the program in accordance with HUD requirements, in a manner that permits a speedy and effective audit. All such records must be made available to HUD or the Comptroller General of the United States upon request.

In addition, the PHA must ensure that all applicant and participant files are maintained in a way that protects an individual's privacy rights.

16-V.B. RECORD RETENTION

The PHA must keep the last three years of the Form HUD-50058 and supporting documentation during the term of each assisted lease, and for a period of at least three years from the end of participation (EOP) date [24 CFR 908.101].

SFHA Policy

During the term of each public housing tenancy, and for at least four years thereafter, the PHA will keep all documents related to a family's eligibility, tenancy, and termination.

In addition, the PHA will keep the following records for at least four years:

- An application from each ineligible family and notice that the applicant is not eligible

- Lead-based paint records as required by 24 CFR 35, Subpart B

- Documentation supporting the establishment of flat rents and the public housing maximum rent

- Documentation supporting the establishment of utility allowances and surcharges

- Documentation supporting PHAS scores

- Accounts and other records supporting PHA budget and financial statements for the program

- Other records as determined by the PHA or as required by HUD

If a hearing to establish a family's citizenship status is held, longer retention requirements apply for some types of documents. For specific requirements, see Section 14-II.A.

16-V.C. RECORDS MANAGEMENT

PHAs must maintain applicant and participant files and information in accordance with the regulatory requirements described below.

SFHA Policy

All applicant and participant information will be kept in a secure location and access will be limited to authorized PHA staff.

PHA staff will not discuss personal family information unless there is a business reason to do so. Inappropriate discussion of family information or improper disclosure of family information by staff will result in disciplinary action.

Privacy Act Requirements [24 CFR 5.212 and Form-9886]

The collection, maintenance, use, and dissemination of social security numbers (SSN), employer identification numbers (EIN), any information derived from these numbers, and income information of applicants and participants must be conducted, to the extent applicable, in compliance with the Privacy Act of 1974, and all other provisions of Federal, State, and local law.

Applicants and participants, including all adults in the household, are required to sign a consent form, HUD-9886, Authorization for Release of Information. This form incorporates the Federal Privacy Act Statement and describes how the information collected using the form may be used, and under what conditions HUD or the PHA may release the information collected.

Upfront Income Verification (UIV) Records

PHAs that access UIV data through HUD's Enterprise Income Verification (EIV) System are required to adopt and follow specific security procedures to ensure that all EIV data is protected in accordance with Federal laws, regardless of the media on which the data is recorded (e.g. electronic, paper). These requirements are contained in the HUD issued document, *Enterprise Income Verification (EIV) System, Security Procedures for Upfront Income Verification (UIV) Data*.

SFHA Policy

Prior to utilizing HUD's EIV system, the PHA will adopt and implement EIV security procedures required by HUD.

Criminal Records

The PHA may only disclose the criminal conviction records which the PHA receives from a law enforcement agency to officers or employees of the PHA, or to authorized representatives of the PHA who have a job-related need to have access to the information [24 CFR 5.903(e)].

The PHA must establish and implement a system of records management that ensures that any criminal record received by the PHA from a law enforcement agency is maintained confidentially, not misused or improperly disseminated, and destroyed, once the purpose for which the record was requested has been accomplished, including expiration of the period for filing a challenge to the PHA action without institution of a challenge or final disposition of any such litigation [24 CFR 5.903(g)].

The PHA must establish and implement a system of records management that ensures that any sex offender registration information received by the PHA from a State or local agency is maintained confidentially, not misused or improperly disseminated, and destroyed, once the purpose for which the record was requested has been accomplished, including expiration of the period for filing a challenge to the PHA action without institution of a challenge or final disposition of any such litigation. This requirement does not apply to information that is public information, or is obtained by a PHA other than under 24 CFR 5.905.

Medical/Disability Records

PHAs are not permitted to inquire about the nature or extent of a person's disability. The PHA may not inquire about a person's diagnosis or details of treatment for a disability or medical condition. If the PHA receives a verification document that provides such information, the PHA should not place this information in the tenant file. The PHA should destroy the document.

**PART VI: REPORTING REQUIREMENTS FOR CHILDREN WITH
ENVIRONMENTAL INTERVENTION BLOOD LEAD LEVEL**

16-VI.A. REPORTING REQUIREMENTS [24 CFR 35.1130(e)]

The PHA has certain responsibilities relative to children with environmental intervention blood lead levels that are living in public housing.

The PHA must report the name and address of a child identified as having an environmental intervention blood lead level to the public health department within 5 business days of being so notified by any other medical health care professional. The PHA must also report each known case of a child with an environmental intervention blood lead level to the HUD field office.

SFHA Policy

The PHA will provide the public health department written notice of the name and address of any child identified as having an environmental intervention blood lead level.

The PHA will provide written notice of each known case of a child with an environmental intervention blood level to the HUD field office within 5 business days of receiving the information.

**PART VII: NOTIFICATION TO APPLICANTS AND TENANTS
REGARDING PROTECTIONS UNDER THE VIOLENCE AGAINST WOMEN
REAUTHORIZATION ACT OF 2005 (VAWA)**

16-VII.A. OVERVIEW

The Violence against Women Reauthorization Act of 2005 (VAWA) requires PHAs to inform public housing tenants of their rights under this law, including their right to confidentiality and the limits thereof. Since VAWA provides protections for applicants as well as tenants, PHAs may elect to provide the same information to applicants [24 CFR 5.2007(3)].

This part describes the steps that the PHA will take to ensure that all actual and potential beneficiaries of its public housing program are notified about their rights under VAWA.

16-VII.B. VAWA NOTIFICATION

SFHA Policy

The PHA will post the following information regarding VAWA in its offices and on its Web site. It will also make the information readily available to anyone who requests it.

A summary of the rights and protections provided by VAWA to public housing applicants and residents who are or have been victims of domestic violence, dating violence, or stalking (see sample notice in Exhibit 16-1)

The definitions of *domestic violence*, *dating violence*, and *stalking* provided in VAWA (included in Exhibit 16-1)

An explanation of the documentation that the PHA may require from an individual who claims the protections provided by VAWA (included in Exhibit 16-1)

A copy of form HUD-50066, Certification of Domestic Violence, Dating Violence, or Stalking

A statement of the PHA's obligation to keep confidential any information that it receives from a victim unless (a) the PHA has the victim's written permission to release the information, (b) it needs to use the information in an eviction proceeding, or (c) it is compelled by law to release the information (included in Exhibit 16-1)

The National Domestic Violence Hot Line: 1-800-799-SAFE (7233) or 1-800-787-3224 (TTY) (included in Exhibit 16-1)

Contact information for local victim advocacy groups or service providers

16-VII.C. NOTIFICATION TO APPLICANTS

SFHA Policy

The PHA will provide all applicants with notification of their protections and rights under VAWA at the time they request an application for housing assistance.

The notice will explain the protections afforded under the law, inform each applicant of PHA confidentiality requirements, and provide contact information for local victim advocacy groups or service providers.

The PHA will also include in all notices of denial a statement explaining the protection against denial provided by VAWA (see section 3-III.F).

16-VII.D. NOTIFICATION TO TENANTS [24 CFR 5.2007(3)]

VAWA requires PHAs to notify tenants assisted under public housing of their rights under this law, including their right to confidentiality and the limits thereof.

SFHA Policy

The PHA will provide all tenants with notification of their protections and rights under VAWA at the time of admission and at annual reexamination.

The notice will explain the protections afforded under the law, inform the tenant of PHA confidentiality requirements, and provide contact information for local victim advocacy groups or service providers.

The PHA will also include in all lease termination notices a statement explaining the protection against termination or eviction provided by VAWA (see Section 13-IV.D).

Part VIII: No Smoking Policy

Purpose of Non-Smoking Policy. The parties desire to mitigate (i) the irritation and known health effects of second hand smoke; (ii) the increased maintenance, cleaning and redecorating costs from smoking; and (iii) the increased risk of fire from smoking.

Definition of Smoking. The term “smoking” means inhaling, exhaling, breathing or carrying or possessing any lighted cigarette, cigar, pipe or other tobacco product or similar lighted product in any manner or in any form.

Non-Smoking Area. Resident agrees and acknowledges that the premises and any interior common areas, including but not limited to community rooms, community bathrooms, lobbies, reception areas, hallways, laundry rooms, stairways, offices and elevators, occupied by Resident, members of Resident’s household and any guest of the Resident shall be smoke free. Resident also agrees that Resident, members of Resident’s household and any guest of the Resident shall refrain from smoking within 15 feet of any building entrances, exits, and operable windows and vents.

Resident to Promote Non-Smoking Policy and to Alert Landlord of Violations. Resident shall inform Resident's guests of the non-smoking policy. Further, Resident shall promptly give Landlord a written statement of any incident where tobacco smoke is migrating into the Resident's unit from sources outside of the Resident's unit.

Landlord to Promote Non-Smoking Policy. Landlord shall post no-smoking signs at entrances and exits, in common areas and in conspicuous places adjoining the grounds of the Non-Smoking Area.

Landlord Not a Guarantor of Smoke-Free Environment. Resident acknowledges that Landlord's adoption of a non-smoking living environment does not make the Landlord or any of its managing agents the guarantor of Resident's health or of the non-smoking condition of the Resident's unit and the common areas. However, Landlord shall take reasonable steps to enforce the non-smoking terms of its leases and to make the Non-Smoking Area as smoke-free as is reasonably possible.

Effect of Breach and Right to Terminate Lease. A breach of this Lease Addendum shall give each party all the rights contained herein, as well as the rights contained in the Lease. A material or continuing breach of this Addendum shall be a material breach of the lease and grounds for termination of the Lease by the Landlord.

EXHIBIT 16-1: SAMPLE NOTICE TO PUBLIC HOUSING APPLICANTS AND RESIDENTS REGARDING THE VIOLENCE AGAINST WOMEN ACT (VAWA)

This sample notice was adapted from a notice prepared by the National Housing Law Project.

A federal law that went into effect in 2006 protects individuals who are victims of domestic violence, dating violence, and stalking. The name of the law is the Violence against Women Act, or “VAWA.” This notice explains your rights under VAWA.

Protections for Victims

If you are eligible for public housing, the housing authority cannot refuse to admit you to the public housing program solely because you are a victim of domestic violence, dating violence, or stalking.

If you are the victim of domestic violence, dating violence, or stalking, the housing authority cannot evict you based on acts or threats of violence committed against you. Also, criminal acts directly related to the domestic violence, dating violence, or stalking that are caused by a member of your household or a guest can’t be the reason for evicting you if you were the victim of the abuse.

Reasons You Can Be Evicted

The housing authority can still evict you if the housing authority can show there is an *actual* and *imminent* (immediate) threat to other tenants or housing authority staff if you are not evicted. Also, the housing authority can evict you for serious or repeated lease violations that are not related to the domestic violence, dating violence, or stalking against you. The housing authority cannot hold you to a more demanding set of rules than it applies to tenants who are not victims.

Removing the Abuser from the Household

The housing authority may split the lease to evict a tenant who has committed criminal acts of violence against family members or others, while allowing the victim and other household members to stay in the public housing unit. If the housing authority chooses to remove the abuser, it may not take away the remaining tenants’ rights to the unit or otherwise punish the remaining tenants. In removing the abuser from the household, the housing authority must follow federal, state, and local eviction procedures.

Proving that You Are a Victim of Domestic Violence, Dating Violence, or Stalking

The housing authority can ask you to prove or “certify” that you are a victim of domestic violence, dating violence, or stalking. In cases of termination or eviction, the housing authority must give you at least 14 business days (i.e. Saturdays, Sundays, and holidays do not count) to provide this proof. The housing authority is free to extend the deadline. There are three ways you can prove that you are a victim:

- Complete the certification form given to you by the housing authority. The form will ask for your name, the name of your abuser, the abuser’s relationship to you, the date, time, and location of the incident of violence, and a description of the violence.
- Provide a statement from a victim service provider, attorney, or medical professional who has helped you address incidents of domestic violence, dating violence, or stalking. The professional must state that he or she believes that the incidents of abuse are real. Both you and the professional must sign the statement, and both of you must state that you are signing “under penalty of perjury.”
- Provide a police or court record, such as a protective order.

If you fail to provide one of these documents within the required time, the housing authority may evict you.

Confidentiality

The housing authority must keep confidential any information you provide about the violence against you, unless:

- You give written permission to the housing authority to release the information.
- The housing authority needs to use the information in an eviction proceeding, such as to evict your abuser.
- A law requires the housing authority to release the information.

If release of the information would put your safety at risk, you should inform the housing authority.

VAWA and Other Laws

VAWA does not limit the housing authority’s duty to honor court orders about access to or control of a public housing unit. This includes orders issued to protect a victim and orders dividing property among household members in cases where a family breaks up.

VAWA does not replace any federal, state, or local law that provides greater protection for victims of domestic violence, dating violence, or stalking.

For Additional Information

If you have any questions regarding VAWA, please contact _____ at _____.

For help and advice on escaping an abusive relationship, call the National Domestic Violence Hotline at 1-800-799-SAFE (7233) or 1-800-787-3224 (TTY).

Definitions

For purposes of determining whether a tenant may be covered by VAWA, the following list of definitions applies:

VAWA defines *domestic violence* to include felony or misdemeanor crimes of violence committed by any of the following:

- A current or former spouse of the victim
- A person with whom the victim shares a child in common
- A person who is cohabitating with or has cohabitated with the victim as a spouse
- A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies
- Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction

VAWA defines *dating violence* as violence committed by a person (1) who is or has been in a social relationship of a romantic or intimate nature with the victim AND (2) where the existence of such a relationship shall be determined based on a consideration of the following factors:

- The length of the relationship
- The type of relationship
- The frequency of interaction between the persons involved in the relationship

VAWA defines *stalking* as (A)(i) to follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate another person OR (ii) to place under surveillance with the intent to kill, injure, harass, or intimidate another person AND (B) in the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to (i) that person, (ii) a member of the immediate family of that person, or (iii) the spouse or intimate partner of that person.

16- VIII. D. NO SMOKING POLICY

NON-SMOKING LEASE ADDENDUM

This Addendum is incorporated into the Lease between the San Francisco Housing Authority (Landlord) and Resident _____ of _____, San Francisco, CA _____.

1. **Purpose of Non-Smoking Policy.** The parties desire to mitigate (i) the irritation and known health effects of second hand smoke; (ii) the increased maintenance, cleaning and redecorating costs from smoking; and (iii) the increased risk of fire from smoking.
2. **Definition of Smoking.** The term “smoking” means inhaling, exhaling, breathing or carrying or possessing any lighted cigarette, cigar, pipe or other tobacco product or similar lighted product in any manner or in any form.
3. **Non-Smoking Area.** Resident agrees and acknowledges that the premises and any interior common areas, including but not limited to community rooms, community bathrooms, lobbies, reception areas, hallways, laundry rooms, stairways, offices and elevators, occupied by Resident, members of Resident’s household and any guest of the Resident shall be smoke free. Resident also agrees that Resident, members of Resident’s household and any guest of the Resident shall refrain from smoking within 15 feet of any building entrances, exits, and operable windows and vents.
4. **Resident to Promote Non-Smoking Policy and to Alert Landlord of Violations.** Resident shall inform Resident’s guests of the non-smoking policy. Further, Resident shall promptly give Landlord a written statement of any incident where tobacco smoke is migrating into the Resident’s unit from sources outside of the Resident’s unit.
5. **Landlord to Promote Non-Smoking Policy.** Landlord shall post no-smoking signs at entrances and exits, in common areas and in conspicuous places adjoining the grounds of the Non-Smoking Area.
6. **Landlord Not a Guarantor of Smoke-Free Environment.** Resident acknowledges that Landlord’s adoption of a non-smoking living environment does not make the Landlord or any of its managing agents the guarantor of Resident’s health or of the non-smoking condition of the Resident’s unit and the common areas. However, Landlord shall take reasonable steps to enforce the non-smoking terms of its leases and to make the Non-Smoking Area as smoke-free as is reasonably possible.
7. **Effect of Breach and Right to Terminate Lease.** A breach of this Lease Addendum shall give each party all the rights contained herein, as well as the rights contained in the Lease. A material or continuing breach of this Addendum shall be a material breach of the lease and grounds for termination of the Lease by the Landlord.

LANDLORD

RESIDENT

By: _____
Authorized Agent for SFHA

Date: _____

GLOSSARY

A. ACRONYMS USED IN SUBSIDIZED HOUSING

AAF	Annual adjustment factor (published by HUD in the Federal Register and used to compute annual rent adjustments)
ACC	Annual contributions contract
ADA	Americans with Disabilities Act of 1990
BR	Bedroom
CDBG	Community Development Block Grant (Program)
CFR	Code of Federal Regulations (published federal rules that define and implement laws; commonly referred to as “the regulations”)
CPI	Consumer price index (published monthly by the Department of Labor as an inflation indicator)
EID	Earned income disallowance
EIV	Enterprise Income Verification
FDIC	Federal Deposit Insurance Corporation
FHA	Federal Housing Administration
FICA	Federal Insurance Contributions Act (established Social Security taxes)
FMR	Fair market rent
FR	Federal Register
FSS	Family Self-Sufficiency (Program)
FY	Fiscal year
FYE	Fiscal year end
GAO	Government Accountability Office
GR	Gross rent
HAP	Housing assistance payment
HCV	Housing choice voucher
HQS	Housing quality standards
HUD	Department of Housing and Urban Development
HUDCLIPS	HUD Client Information and Policy System
IPA	Independent public accountant
IRA	Individual Retirement Account
IRS	Internal Revenue Service
JTPA	Job Training Partnership Act

LBP	Lead-based paint
MSA	Metropolitan statistical area (established by the U.S. Census Bureau)
MTCS	Multi-family Tenant Characteristics System (now the Form HUD-50058 submodule of the PIC system)
MTW	Moving to Work
NOFA	Notice of funding availability
OIG	HUD's Office of Inspector General
OMB	Office of Management and Budget
PHA	Public housing agency
PIC	PIH Information Center
PIH	(HUD Office of) Public and Indian Housing
PS	Payment standard
QC	Quality control
QHWRA	Quality Housing and Work Responsibility Act of 1998 (also known as the Public Housing Reform Act)
REAC	(HUD) Real Estate Assessment Center
RFP	Request for proposals
RFTA	Request for tenancy approval
RIGI	Regional inspector general for investigation (handles fraud and program abuse matters for HUD at the regional office level)
SEMAP	Section 8 Management Assessment Program
SRO	Single room occupancy
SSA	Social Security Administration
SSI	Supplemental security income
TANF	Temporary assistance for needy families
TPV	Tenant protection vouchers
TR	Tenant rent
TTP	Total tenant payment
UA	Utility allowance
UIV	Upfront income verification
URP	Utility reimbursement payment
VAWA	Violence Against Women Reauthorization Act of 2005

B. GLOSSARY OF SUBSIDIZED HOUSING TERMS

Absorption. In portability (under subpart H of this part 982): the point at which a receiving PHA stops billing the initial PHA for assistance on behalf of a portability family. The receiving PHA uses funds available under the receiving PHA consolidated ACC.

Accessible. The facility or portion of the facility can be approached, entered, and used by persons with disabilities.

Adjusted income. Annual income, less allowable HUD deductions and allowances.

Administrative fee. Fee paid by HUD to the PHA for administration of the program. See §982.152.

Administrative plan. The plan that describes PHA policies for administration of the tenant-based programs. The Administrative Plan and any revisions must be approved by the PHA's board and included as a supporting document to the PHA Plan. See §982.54.

Admission. The point when the family becomes a participant in the program. The date used for this purpose is the effective date of the first HAP contract for a family (first day of initial lease term) in a tenant-based program.

Amortization payment. In a manufactured home space rental: The monthly debt service payment by the family to amortize the purchase price of the manufactured home.

Annual contributions contract (ACC). The written contract between HUD and a PHA under which HUD agrees to provide funding for a program under the 1937 Act, and the PHA agrees to comply with HUD requirements for the program.

Annual income. The anticipated total income of an eligible family from all sources for the 12-month period following the date of determination of income, computed in accordance with the regulations.

Applicant (applicant family). A family that has applied for admission to a program but is not yet a participant in the program.

Area exception rent. An amount that exceeds the published FMR. See 24 CFR 982.504(b).

As-paid states. States where the welfare agency adjusts the shelter and utility component of the welfare grant in accordance with actual housing costs.

Assets. (See *net family assets.*)

Auxiliary aids. Services or devices that enable persons with impaired sensory, manual, or speaking skills to have an equal opportunity to participate in, and enjoy the benefits of, programs or activities receiving federal financial assistance.

Bifurcate. With respect to a public housing or Section 8 lease, to divide a lease as a matter of law such that certain tenants can be evicted or removed while the remaining family members' lease and occupancy rights are allowed to remain intact.

Budget authority. An amount authorized and appropriated by the Congress for payment to PHAs under the program. For each funding increment in a PHA program, budget authority is the maximum amount that may be paid by HUD to the PHA over the ACC term of the funding increment.

Child. A member of the family other than the family head or spouse who is under 18 years of age.

Child care expenses. Amounts anticipated to be paid by the family for the care of children under 13 years of age during the period for which annual income is computed, but only where such care is necessary to enable a family member to actively seek employment, be gainfully employed, or to further his or her education and only to the extent such amounts are not reimbursed. The amount deducted shall reflect reasonable charges for child care. In the case of child care necessary to permit employment, the amount deducted shall not exceed the amount of employment income that is included in annual income.

Citizen. A citizen or national of the United States.

Cohead. An individual in the household who is equally responsible for the lease with the head of household. A family may have a cohead or spouse but not both. A cohead never qualifies as a dependent. The cohead must have legal capacity to enter into a lease.

Common space. In shared housing, the space available for use by the assisted family and other occupants of the unit.

Computer match. The automated comparison of databases containing records about individuals.

Confirmatory review. An on-site review performed by HUD to verify the management performance of a PHA.

Consent form. Any consent form approved by HUD to be signed by assistance applicants and participants to obtain income information from employers and SWICAs; return information from the Social Security Administration (including wages, net earnings from self-employment, and retirement income); and return information for unearned income from the IRS. Consent forms expire after a certain time and may authorize the collection of other information to determine eligibility or level of benefits.

Congregate housing. Housing for elderly persons or persons with disabilities that meets the HQS for congregate housing. A special housing type: see 24 CFR 982.606–609.

Contiguous MSA. In portability (under subpart H of part 982): An MSA that shares a common boundary with the MSA in which the jurisdiction of the initial PHA is located.

Continuously assisted. An applicant is continuously assisted under the 1937 Act if the family is already receiving assistance under any 1937 Housing Act program when the family is admitted to the voucher program.

Contract authority. The maximum annual payment by HUD to a PHA for a funding increment.

Cooperative (term includes mutual housing). Housing owned by a nonprofit corporation or association, and where a member of the corporation or association has the right to reside in a particular apartment, and to participate in management of the housing. A special housing type (see 24 CFR 982.619).

Covered families. Statutory term for families who are required to participate in a welfare agency economic self-sufficiency program and who may be subject to a welfare benefit sanction for noncompliance with this obligation. Includes families who receive welfare assistance or other public assistance under a program for which federal, state or local law requires that a member of the family must participate in an economic self-sufficiency program as a condition for the assistance.

Dating violence. Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:

- The length of the relationship
- The type of relationship
- The frequency of interaction between the persons involved in the relationship

Dependent. A member of the family (except foster children and foster adults) other than the family head or spouse, who is under 18 years of age, or is a person with a disability, or is a full-time student.

Dependent child. In the context of the student eligibility restrictions, a dependent child of a student enrolled in an institution of higher education. The dependent child must also meet the definition of *dependent* as specified above.

Disability assistance expenses. Reasonable expenses that are anticipated, during the period for which annual income is computed, for attendant care and auxiliary apparatus for a disabled family member, and that are necessary to enable a family member (including the disabled member) to be employed, provided that the expenses are neither paid to a member of the family nor reimbursed by an outside source.

Disabled family. A family whose head, cohead, spouse, or sole member is a person with disabilities; two or more persons with disabilities living together; or one or more persons with disabilities living with one or more live-in aides.

Disabled person. See *person with disabilities*.

Disallowance. Exclusion from annual income.

Displaced family. A family in which each member, or whose sole member, is a person displaced by governmental action, or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to federal disaster relief laws.

Domestic violence. Felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Domicile. The legal residence of the household head or spouse as determined in accordance with state and local law.

Drug-related criminal activity. As defined in 42 U.S.C. 1437f(f)(5).

Drug-trafficking. The illegal manufacture, sale, or distribution, or the possession with intent to manufacture, sell, or distribute, of a controlled substance as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802).

Economic self-sufficiency program. Any program designed to encourage, assist, train or facilitate the economic independence of assisted families, or to provide work for such families. Can include job training, employment counseling, work placement, basic skills training, education, English proficiency, Workfare, financial or household management, apprenticeship, or any other program necessary to ready a participant to work (such as treatment for drug abuse or mental health treatment). Includes any work activities as defined in the Social Security Act (42 U.S.C. 607(d)). Also see 24 CFR 5.603(c).

Elderly family. A family whose head, cohead, spouse, or sole member is a person who is at least 62 years of age; two or more persons who are at least 62 years of age living together; or one or more persons who are at least 62 years of age living with one or more live-in aides.

Elderly person. An individual who is at least 62 years of age.

Eligible family (Family). A family that is income eligible and meets the other requirements of the 1937 Act and Part 5 of 24 CFR.

Employer identification number (EIN). The nine-digit taxpayer identifying number that is assigned to an individual, trust, estate, partnership, association, company, or corporation.

Evidence of citizenship or eligible status. The documents which must be submitted as evidence of citizenship or eligible immigration status. (See 24 CFR 5.508(b).)

Extremely low-income family. A family whose annual income does not exceed 30 percent of the median income for the area, as determined by HUD, with adjustments for smaller and larger families. HUD may establish income ceilings higher or lower than 30 percent of median income if HUD finds such variations are necessary due to unusually high or low family incomes. (See 24 CFR 5.603.)

Facility. All or any portion of buildings, structures, equipment, roads, walks, parking lots, rolling stock, or other real or personal property or interest in the property.

Fair Housing Act. Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988.

Fair market rent (FMR). The rent, including the cost of utilities (except telephone), as established by HUD for units of varying sizes (by number of bedrooms), that must be paid in the housing market area to rent privately owned, existing, decent, safe, and sanitary rental housing of modest (non-luxury) nature with suitable amenities. See periodic publications in the *Federal Register* in accordance with 24 CFR Part 888.

Family. Includes but is not limited to the following, and can be further defined in PHA policy.

- A family with or without children (the temporary absence of a child from the home due to placement in foster care is not considered in determining family composition and family size)
- An elderly family or a near-elderly family
- A displaced family
- The remaining member of a tenant family
- A single person who is not an elderly or displaced person, or a person with disabilities, or the remaining member of a tenant family.

Family rent to owner. In the voucher program, the portion of rent to owner paid by the family.

Family self-sufficiency program (FSS program). The program established by a PHA in accordance with 24 CFR part 984 to promote self-sufficiency of assisted families, including the coordination of supportive services (42 U.S.C. 1437u).

Family share. The portion of rent and utilities paid by the family. For calculation of family share, see 24 CFR 982.515(a).

Family unit size. The appropriate number of bedrooms for a family, as determined by the PHA under the PHA subsidy standards.

Federal agency. A department of the executive branch of the Federal Government.

Foster child care payment. A payment to eligible households by state, local, or private agencies appointed by the state to administer payments for the care of foster children.

Full-time student. A person who is attending school or vocational training on a full-time basis (carrying a subject load that is considered full-time for day students under the standards and practices of the educational institution attended). (See 24 CFR 5.603)

Funding increment. Each commitment of budget authority by HUD to a PHA under the consolidated annual contributions contract for the PHA program.

Gross rent. The sum of the rent to owner plus any utility allowance.

Group home. A dwelling unit that is licensed by a state as a group home for the exclusive residential use of two to twelve persons who are elderly or persons with disabilities (including any live-in aide). (A special housing type: see 24 CFR 982.610–614.)

Handicap. Any condition or characteristic that renders a person an individual with handicaps. (See *person with disabilities*.)

HAP contract. The housing assistance payments contract. A written contract between the PHA and an owner for the purpose of providing housing assistance payments to the owner on behalf of an eligible family.

Head of household. The adult member of the family who is the head of the household for purposes of determining income eligibility and rent.

Household. A household includes additional people other than the family who, with the PHA's permission, live in an assisted unit, such as live-in aides, foster children, and foster adults.

Housing assistance payment. The monthly assistance payment by a PHA, which includes: (1) A payment to the owner for rent to the owner under the family's lease; and (2) An additional payment to the family if the total assistance payment exceeds the rent to owner.

Housing agency (HA). See *public housing agency*.

Housing quality standards (HQS). The HUD minimum quality standards for housing assisted under the voucher program.

HUD. The U.S. Department of Housing and Urban Development.

Immediate family member. A spouse, parent, brother, sister, or child of that person, or an individual to whom that person stands in the position or place of a parent; or any other person living in the household of that person and related to that person by blood and marriage.

Imputed asset. An asset disposed of for less than fair market value during the two years preceding examination or reexamination.

Imputed income. The HUD passbook rate multiplied by the total cash value of assets. The calculation is used when net family assets exceed \$5,000.

Imputed welfare income. An amount of annual income that is not actually received by a family as a result of a specified welfare benefit reduction, but is included in the family's annual income and therefore reflected in the family's rental contribution.

Income. Income from all sources of each member of the household, as determined in accordance with criteria established by HUD.

Income for eligibility. Annual income.

Income information means information relating to an individual's income, including:

- All employment income information known to current or previous employers or other income sources
- All information about wages, as defined in the state's unemployment compensation law, including any social security number; name of the employee; quarterly wages of the employee; and the name, full address, telephone number, and, when known, employer identification number of an employer reporting wages under a state unemployment compensation law
- Whether an individual is receiving, has received, or has applied for unemployment compensation, and the amount and the period received
- Unearned IRS income and self-employment wages and retirement income
- Wage, social security, and supplemental security income data obtained from the Social Security Administration.

Individual with handicaps. See *person with disabilities*.

Initial PHA. In portability, the term refers to both: (1) A PHA that originally selected a family that later decides to move out of the jurisdiction of the selecting PHA; and (2) A PHA that absorbed a family that later decides to move out of the jurisdiction of the absorbing PHA.

Initial payment standard. The payment standard at the beginning of the HAP contract term.

Initial rent to owner. The rent to owner at the beginning of the HAP contract term.

Institution of higher education. An institution of higher education as defined in 20 U.S.C. 1001 and 1002. See Exhibit 3-2 in this Administrative Plan.

Jurisdiction. The area in which the PHA has authority under state and local law to administer the program.

Landlord. Either the owner of the property or his/her representative, or the managing agent or his/her representative, as shall be designated by the owner.

Lease. A written agreement between an owner and a tenant for the leasing of a dwelling unit to the tenant. The lease establishes the conditions for occupancy of the dwelling unit by a family with housing assistance payments under a HAP contract between the owner and the PHA.

Live-in aide. A person who resides with one or more elderly persons, or near-elderly persons, or persons with disabilities, and who:

- Is determined to be essential to the care and well-being of the persons;
- Is not obligated for the support of the persons; and
- Would not be living in the unit except to provide the necessary supportive services.

Local Preference. A preference used by the PHA to select among applicant families.

Low-Income Family. A family whose income does not exceed 80 percent of the median income for the area as determined by HUD with adjustments for smaller or larger families, except that HUD may establish income limits higher or lower than 80 percent for areas with unusually high or low incomes.

Manufactured home. A manufactured structure that is built on a permanent chassis, is designed for use as a principal place of residence, and meets the HQS. (A special housing type: see 24 CFR 982.620 and 982.621.)

Manufactured home space. In manufactured home space rental: A space leased by an owner to a family. A manufactured home owned and occupied by the family is located on the space. See 24 CFR 982.622 to 982.624.

Medical expenses. Medical expenses, including medical insurance premiums, that are anticipated during the period for which annual income is computed, and that are not covered by insurance (a deduction for elderly or disabled families only). These allowances are given when calculating adjusted income for medical expenses in excess of 3 percent of annual income.

Minor. A member of the family household other than the family head or spouse, who is under 18 years of age.

Mixed family. A family whose members include those with citizenship or eligible immigration status, and those without citizenship or eligible immigration status.

Monthly adjusted income. One twelfth of adjusted income.

Monthly income. One twelfth of annual income.

Mutual housing. Included in the definition of *cooperative*.

National. A person who owes permanent allegiance to the United States, for example, as a result of birth in a United States territory or possession.

Near-elderly family. A family whose head, spouse, or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62 living with one or more live-in aides.

Net family assets. (1) Net cash value after deducting reasonable costs that would be incurred in disposing of real property, savings, stocks, bonds, and other forms of capital investment, excluding interests in Indian trust land and excluding equity accounts in HUD homeownership programs. The value of necessary items of personal property such as furniture and automobiles shall be excluded.

- In cases where a trust fund has been established and the trust is not revocable by, or under the control of, any member of the family or household, the value of the trust fund will not be considered an asset so long as the fund continues to be held in trust. Any income distributed from the trust fund shall be counted when determining annual income under §5.609.
- In determining net family assets, PHAs or owners, as applicable, shall include the value of any business or family assets disposed of by an applicant or tenant for less than fair market value (including a disposition in trust, but not in a foreclosure or bankruptcy sale) during the two years preceding the date of application for the program or reexamination, as applicable, in excess of the consideration received therefore. In the case of a disposition as part of a separation or divorce settlement, the disposition will not be considered to be for less than fair market value if the applicant or tenant receives important consideration not measurable in dollar terms.

Noncitizen. A person who is neither a citizen nor national of the United States.

Notice of funding availability (NOFA). For budget authority that HUD distributes by competitive process, the *Federal Register* document that invites applications for funding. This document explains how to apply for assistance and the criteria for awarding the funding.

Office of General Counsel (OGC). The General Counsel of HUD.

Owner. Any person or entity with the legal right to lease or sublease a unit to a participant.

PHA Plan. The annual plan and the 5-year plan as adopted by the PHA and approved by HUD.

PHA's quality control sample. An annual sample of files or records drawn in an unbiased manner and reviewed by a PHA supervisor (or by another qualified person other than the person who performed the original work) to determine if the work documented in the files or records conforms to program requirements. For minimum sample size see CFR 985.3.

Participant (participant family). A family that has been admitted to the PHA program and is currently assisted in the program. The family becomes a participant on the effective date of the first HAP contract executed by the PHA for the family (first day of initial lease term).

Payment standard. The maximum monthly assistance payment for a family assisted in the voucher program (before deducting the total tenant payment by the family).

Person with disabilities. *For the purposes of program eligibility.* A person who has a disability as defined under the Social Security Act or Developmental Disabilities Care Act, or a person who has a physical or mental impairment expected to be of long and indefinite duration and whose ability to live independently is substantially impeded by that impairment but could be improved by more suitable housing conditions. This includes persons with AIDS or conditions arising from AIDS but excludes persons whose disability is based solely on drug or alcohol dependence. *For the purposes of reasonable accommodation.* A person with a physical or mental impairment that substantially limits one or more major life activities, a person regarded as having such an impairment, or a person with a record of such an impairment.

Portability. Renting a dwelling unit with a Section 8 housing choice voucher outside the jurisdiction of the initial PHA.

Premises. The building or complex in which the dwelling unit is located, including common areas and grounds.

Previously unemployed. With regard to the earned income disallowance, a person with disabilities who has earned, in the 12 months previous to employment, no more than would be received for 10 hours of work per week for 50 weeks at the established minimum wage.

Private space. In shared housing, the portion of a contract unit that is for the exclusive use of an assisted family.

Processing entity. The person or entity that, under any of the programs covered, is responsible for making eligibility and related determinations and any income reexamination. In the HCV program, the “processing entity” is the “responsible entity.”

Project owner. The person or entity that owns the housing project containing the assisted dwelling unit.

Public assistance. Welfare or other payments to families or individuals, based on need, which are made under programs funded, separately or jointly, by federal, state, or local governments.

Public housing agency (PHA). Any State, county, municipality, or other governmental entity or public body, or agency or instrumentality of these entities, that is authorized to engage or assist in the development or operation of low-income housing under the 1937 Act.

Qualified family (under the earned income disallowance). A family participating in an applicable assisted housing program or receiving HCV assistance:

- Whose annual income increases as a result of employment of a family member who is a person with disabilities and who was previously unemployed for one or more years prior to employment;
- Whose annual income increases as a result of increased earnings by a family member who is a person with disabilities during participation in any economic self-sufficiency or other job training program; or
- Whose annual income increases, as a result of new employment or increased earnings of a family member who is a person with disabilities, during or within six months after receiving assistance, benefits or services under any state program for temporary assistance for needy families funded under Part A of Title IV of the Social Security Act, as determined by the responsible entity in consultation with the local agencies administering temporary assistance for needy families (TANF) and Welfare-to-Work (WTW) programs. The TANF program is not limited to monthly income maintenance, but also includes such benefits and services as one-time payments, wage subsidies and transportation assistance--provided that the total amount over a six-month period is at least \$500.

Qualified census tract. With regard to certain tax credit units, any census tract (or equivalent geographic area defined by the Bureau of the Census) in which at least 50 percent of households have an income of less than 60 percent of Area Median Gross Income (AMGI), or where the poverty rate is at least 25 percent, and where the census tract is designated as a qualified census tract by HUD.

Reasonable rent. A rent to owner that is not more than rent charged: (1) For comparable units in the private unassisted market; and (2) For comparable unassisted units in the premises.

Reasonable accommodation. A change, exception, or adjustment to a rule, policy, practice, or service to allow a person with disabilities to fully access the PHA's programs or services.

Receiving PHA. In portability: A PHA that receives a family selected for participation in the tenant-based program of another PHA. The receiving PHA issues a voucher and provides program assistance to the family.

Recertification. Sometimes called *reexamination*. The process of securing documentation of total family income used to determine the rent the tenant will pay for the next 12 months if there are no additional changes to be reported.

Remaining member of the tenant family. The person left in assisted housing who may or may not normally qualify for assistance on their own circumstances (i.e., an elderly spouse dies, leaving widow age 47 who is not disabled).

Rent to owner. The total monthly rent payable to the owner under the lease for the unit (also known as contract rent). Rent to owner covers payment for any housing services, maintenance, and utilities that the owner is required to provide and pay for.

Residency preference. A PHA preference for admission of families that reside anywhere in a specified area, including families with a member who works or has been hired to work in the area (See *residency preference area*).

Residency preference area. The specified area where families must reside to qualify for a residency preference.

Responsible entity. For the public housing and the Section 8 tenant-based assistance, project-based certificate assistance, and moderate rehabilitation programs, the responsible entity means the PHA administering the program under an ACC with HUD. For all other Section 8 programs, the responsible entity means the Section 8 owner.

Secretary. The Secretary of Housing and Urban Development.

Section 8. Section 8 of the United States Housing Act of 1937.

Section 8 covered programs. All HUD programs which assist housing under Section 8 of the 1937 Act, including Section 8 assisted housing for which loans are made under Section 202 of the Housing Act of 1959.

Section 214. Section 214 of the Housing and Community Development Act of 1980, as amended.

Section 214 covered programs. The collective term for the HUD programs to which the restrictions imposed by Section 214 apply. These programs are set forth in 24 CFR 5.500.

Security deposit. A dollar amount (maximum set according to the regulations) which can be used for unpaid rent or damages to the owner upon termination of the lease.

Set-up charges. In a manufactured home space rental, charges payable by the family for assembling, skirting, and anchoring the manufactured home.

Shared housing. A unit occupied by two or more families. The unit consists of both common space for shared use by the occupants of the unit and separate private space for each assisted family. (A special housing type: see 24 CFR 982.615–982.618.)

Single Person. A person living alone or intending to live alone.

Single room occupancy housing (SRO). A unit that contains no sanitary facilities or food preparation facilities, or contains either, but not both, types of facilities. (A special housing type: see 24 CFR 982.602–982.605.)

Social security number (SSN). The nine-digit number that is assigned to a person by the Social Security Administration and that identifies the record of the person's earnings reported to the Social Security Administration. The term does not include a number with a letter as a suffix that is used to identify an auxiliary beneficiary.

Special admission. Admission of an applicant that is not on the PHA waiting list or without considering the applicant's waiting list position.

Special housing types. See subpart M of part 982. Subpart M states the special regulatory requirements for: SRO housing, congregate housing, group homes, shared housing, cooperatives (including mutual housing), and manufactured homes (including manufactured home space rental).

Specified welfare benefit reduction. Those reductions of welfare benefits (for a covered family) that may not result in a reduction of the family rental contribution. A reduction of welfare benefits because of fraud in connection with the welfare program, or because of welfare sanction due to noncompliance with a welfare agency requirement to participate in an economic self-sufficiency program.

Spouse. The marriage partner of the head of household.

Stalking. To follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate; or to place under surveillance with the intent to kill, injure, harass, or intimidate another person; and in the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to (1) that person, (2) a member of the immediate family of that person, or (3) the spouse or intimate partner of that person.

State wage information collection agency (SWICA). The state agency, including any Indian tribal agency, receiving quarterly wage reports from employers in the state, or an alternative system that has been determined by the Secretary of Labor to be as effective and timely in providing employment-related income and eligibility information.

Subsidy standards. Standards established by a PHA to determine the appropriate number of bedrooms and amount of subsidy for families of different sizes and compositions.

Suspension. Stopping the clock on the term of a family's voucher after the family submits a request for tenancy approval. If the PHA decides to allow extensions or suspensions of the voucher term, the PHA administrative plan must describe how the PHA determines whether to grant extensions or suspensions, and how the PHA determines the length of any extension or suspension. This practice is also called *tolling*.

Tax credit rent. With regard to certain tax credit units, the rent charged for comparable units of the same bedroom size in the building that also receive the low-income housing tax credit but do not have any additional rental assistance (e.g., tenant-based voucher assistance).

Tenancy addendum. For the housing choice voucher program, the lease language required by HUD in the lease between the tenant and the owner.

Tenant. The person or persons (other than a live-in aide) who executes the lease as lessee of the dwelling unit.

Tenant rent to owner. See *family rent to owner*.

Term of lease. The amount of time a tenant agrees in writing to live in a dwelling unit.

Total tenant payment (TTP). The total amount the HUD rent formula requires the tenant to pay toward rent and utilities.

Unit. Residential space for the private use of a family. The size of a unit is based on the number of bedrooms contained within the unit and generally ranges from zero (0) bedrooms to six (6) bedrooms.

Utility allowance. If the cost of utilities (except telephone) and other housing services for an assisted unit is not included in the tenant rent but is the responsibility of the family occupying the unit, an amount equal to the estimate made or approved by a PHA or HUD of the monthly cost of a reasonable consumption of such utilities and other services for the unit by an energy-conservative household of modest circumstances consistent with the requirements of a safe, sanitary, and healthful living environment.

Utility reimbursement. In the voucher program, the portion of the housing assistance payment which exceeds the amount of rent to owner.

Utility hook-up charge. In a manufactured home space rental: Costs payable by a family for connecting the manufactured home to utilities such as water, gas, electrical and sewer lines.

Very low-income family. A low-income family whose annual income does not exceed 50 percent of the median income for the area, as determined by HUD, with adjustments for smaller and larger families. HUD may establish income limits higher or lower than 50 percent of the median income for the area on the basis of its finding that such variations are necessary because of unusually high or low family incomes. This is the income limit for the housing choice voucher program.

Violent criminal activity. Any illegal criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force against the person or property of another.

Voucher (housing choice voucher). A document issued by a PHA to a family selected for admission to the housing choice voucher program. This document describes the program and the procedures for PHA approval of a unit selected by the family. The voucher also states obligations of the family under the program.

Voucher holder. A family holding a voucher with an unexpired term (search time).

Voucher program. The housing choice voucher program.

Waiting list admission. An admission from the PHA waiting list.

Welfare assistance. Income assistance from federal or state welfare programs, including assistance provided under TANF and general assistance. Does not include assistance directed solely to meeting housing expenses, nor programs that provide health care, child care or other services for working families. For the FSS program (984.103(b)), *welfare assistance* includes only cash maintenance payments from federal or state programs designed to meet a family's ongoing basic needs, but does not include food stamps, emergency rental and utilities assistance, SSI, SSDI, or social security.



**San Francisco Housing Authority Policy:
Limited English Proficiency Plan
Appendix A**

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1.0 Effective May 24, 2010; Policy Number 1

2.0 Purpose of the Policy & Plan Statement

The San Francisco Housing Authority (“SFHA”) has adopted this plan to provide meaningful access to its programs and activities by persons with Limited English Proficiency (“LEP”). In accordance with Federal guidelines, the SFHA will make reasonable efforts to provide or arrange free language assistance for its LEP clients, including applicants, recipients and/or persons eligible for public housing, Section 8/Housing Choice Vouchers, homeownership and other SFHA programs.

3.0 Detailed Policy Statement

3.1 Meaningful Access: Four Factor Analysis

Meaningful access is free language assistance in accordance with Federal guidelines. No less than every five (5) years, The SFHA will assess and update the following four-factor analysis, including but not limited to:

- 1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the SFHA;

- 2) The frequency with which with LEP persons using a particular language come into contact with the SFHA;
- 3) The nature and importance of the SFHA program, activity or service to the person's life;
- 4) The SFHA's resources and the cost of providing meaningful access. Reasonable steps may cease to be reasonable where the costs imposed substantially exceed the benefits.

RACE	Total	Percentage	
WHITE	338,466	44.68%	
BLACK	50,750	6.70%	
AMERICAN INDIAN	1,672	0.22%	
ASIAN	238,344	31.46%	
NATIVE HAWAIIAN AND OTHER PACIFIC ISLANDER	3,228	0.43%	
HISPANIC	105,790	13.96%	
OTHER	19,354	2.55%	
	757,604	100.00%	3.1.1 Factor <u>One</u>

The number or proportion of LEP persons eligible to be served or likely to be encountered by the SFHA: This determination will be made based on U.S. Census Bureau data and language preference data compiled by SFHA. The U.S. Census Bureau's American Fact Finder for the County of San Francisco, provides the following statistics for the 757,064 total population:

The SFHA language preference data compiled based on reports generated from the SFHA PHAMS client file computer system, produced the following statistics on clients we currently serve:

LANGAUGE	total	percentage
N/A	678	1.22%
CAMBODIAN	134	0.24%
CANTONESE	12780	22.91%
ENGLISH	29939	53.67%
FARSI	66	0.12%
KOREAN	324	0.58%
LAOTIAN	39	0.07%
MANDARIN	878	1.57%
RUSSIAN	2958	5.30%
SAMOAN	272	0.49%
SPANISH	3715	6.66%
TAGOLOG	721	1.29%
VIETNAMESE	3283	5.88%
	55787	100.00%

A determination as to whether 5 percent of the SFHA clientele speaks a specific language will trigger consideration of vital document translation.

3.1.2 Factor Two

The frequency with which with LEP persons using a particular language come into contact with the SFHA: This determination will be made based on the reports generated from sign-in sheets at SFHA offices. These sign-in sheets track the frequency and types of language assistance requested by SFHA clients.

3.1.3 Factor Three

The nature and importance of the SFHA program, activity or service to the person's life: SFHA adheres to the philosophy that housing is essential and extremely important. Thus, when a staff member engages a client in a discussion involving the client's rights to benefits, programs or services offered by the SFHA, the staff member must determine whether failure to provide language assistance would result in a substantial delay that would adversely affect the client's rights.

3.1.4 Factor Four

The SFHA's resources and the cost of providing meaningful access: The SFHA will utilize a combination of procured vendors and SFHA multi-lingual staff members as professional, competent translators and interpreters. SFHA will procure qualified vendors to provide written translations of vital documents, as well as oral interpretation for languages not spoken by SFHA staff members. SFHA staff members who agree to serve as trained oral interpreters will receive additional compensation for demonstrating proficiency in multiple languages, participating in interpreter/cultural competency training, and serving as oral interpreters.

Additionally, SFHA will establish partnerships with city departments/agencies and community organizations to provide volunteer interpreter services for our clients, as an alternative when professional interpreters (procured vendors and SFHA staff members) are unavailable. As a last resort, SFHA will allow clients to waive their right to professional and/or volunteer language services, so that clients may utilize friends or family members (who are not minors) as oral interpreters.

3.2 Language Assistance

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient (LEP) person and may be entitled to language assistance with respect to SFHA programs and activities.

SFHA staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English. The staff will use the LEP Language Chart to identify the language spoken/written by the applicants/participants. Staff will also use the Personal Declaration form at every admission and re-certification to update the translation/interpretation services needed for each household.

The SFHA will assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of clients. The SFHA will track client requests for language assistance using sign-in sheets at SFHA office locations. The SFHA will track clients' identified language preferences using the SFHA PHAMS computer system.

The SFHA will distinguish between language assistance provided in the form of 1) written translations, and 2) oral interpretations.

3.2.1 Written Translations

The SFHA will weigh the costs and benefits of translating documents for potential LEP groups, considering the expense of translating the documents, the barriers to meaningful translation or interpretation of technical housing information, the likelihood of frequent changes in documents, the existence of multiple dialects within a single language group, and other relevant factors. The SFHA will undertake this examination when an eligible LEP group constitutes five percent of an eligible client group.

Based on the Four-Factor analysis, SFHA translates vital documents to Chinese (Cantonese), Russian, Spanish and Vietnamese. Vital documents are listed in the LEP Plan Procedure.

A client may request oral interpretations of the above documents into languages not listed above. A client may also request oral interpretations of documents not translated.

As opportunities arise, the SFHA may work with other housing authorities to share the costs of translating common documents, which may include language groups, which currently do not reach the threshold level in the SFHA's client population.

The SFHA will require a client to certify that the client understood the document translated with the Translation Certification Document.

The SFHA staff member will also explain to the client that any written translations of SFHA or HUD forms are not the official/legal version of the form. Vital document translations are used for the sole purpose of helping the LEP client understand the contents of the document. When a staff member uses a vital document translation to help a client understand a document, the client will only sign documents and forms in the English version.

3.2.2 Oral Interpretations

The SFHA will provide interpreters, including multi-lingual staff and procured vendors at important stages, including, but not limited to Initial Eligibility, Re-Certification and Formal/Informal Hearings. written translation and verbal interpretation services will be provided consistent with the four-factor analysis detailed above.

In cases of Formal/Informal Hearings an SFHA staff interpreter may not be a subordinate to the SFHA staff member rendering a decision on the client's hearing.

The SFHA will require a client to certify that the client understood the matter communicated and/or document interpreted with the Translation Certification Document and/or Interpretation Certification Document.

After the SFHA has offered free interpreter services, if an LEP client prefers to use an informal interpreter, such as a friend or family member (who is not a minor), the informal interpreter may interpret. In these cases the client and interpreter of choice will sign a waiver of free interpreter services.

4.0 Applicability

This policy applies to all management and staff of the SFHA. Failure to comply with this policy can result in termination of employment.

5.0 Cognizant Offices / Getting Help

Questions about this policy should be addressed to the LEP Manager.

6.0 Implementation Procedures

The implementation procedures for this policy are the LEP Plan Procedure, which can be provided upon request.

San Francisco Housing Authority

Housing Choice Voucher Administrative Plan



Revised September 2012

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Chapter 1

OVERVIEW OF THE PROGRAM AND PLAN

INTRODUCTION

The PHA receives its funding for the Housing Choice Voucher (HCV) program from the Department of Housing and Urban Development. The PHA is not a federal department or agency. A public housing agency (PHA) is a governmental or public body, created and authorized by state law to develop and operate housing and housing programs for low-income families. The PHA enters into an Annual Contributions Contract with HUD to administer the program requirements on behalf of HUD. The PHA must ensure compliance with federal laws, regulations and notices and must establish policy and procedures to clarify federal requirements and to ensure consistency in program operation.

This chapter contains information about the PHA and its programs with emphasis on the HCV program. It also contains information about the purpose, intent and use of the plan and guide.

There are three parts to this chapter:

Part I: The Public Housing Agency (PHA). This part includes a description of the PHA, its jurisdiction, its programs, and its mission and intent.

Part II: The HCV Program. This part contains information about the Housing Choice Voucher program operation, roles and responsibilities, and partnerships.

Part III: The HCV Administrative Plan. This part discusses the purpose and organization of the plan and its revision requirements.

PART I: THE PHA

1-I.A. OVERVIEW

This part explains the origin of the PHA's creation and authorization, the general structure of the organization, and the relationship between the PHA Board and staff.

1-I.B. ORGANIZATION AND STRUCTURE OF THE PHA

The Section 8 tenant-based Housing Choice Voucher (HCV) assistance program is funded by the federal government and administered by the San Francisco Housing Authority for the jurisdiction of the City and County of San Francisco.

The officials of a PHA are known as commissioners or, collectively, as the board of commissioners. Commissioners are appointed in accordance with state housing law and generally serve in the same capacity as the directors of a corporation, establishing policies under which the PHA conducts business, ensuring that policies are followed by PHA staff and ensuring that the PHA is successful in its mission. The board is responsible for preserving and expanding the agency's resources and assuring the agency's continued viability.

Formal actions of the PHA are taken through written resolutions, adopted by the board of commissioners and entered into the official records of the PHA.

The principal staff member of the PHA is the executive director (ED), hired and appointed by the board of commissioners. The executive director is directly responsible for carrying out the policies established by the commissioners and is delegated the responsibility for hiring, training and supervising the remainder of the PHA's staff in order to manage the day-to-day operations of the PHA to ensure compliance with federal and state laws and directives for the programs managed. In addition, the executive director's duties include budgeting and financial planning for the agency.

1-I.C. PHA MISSION

The purpose of a mission statement is to communicate the purpose of the agency to people inside and outside of the agency. It provides guiding direction for developing strategy, defining critical success factors, searching out key opportunities, making resource allocation choices, satisfying clients and stakeholders, and making decisions.

SFHA Policy

The mission of the San Francisco Housing Authority is to deliver safe and decent housing for low income households and integrate economic opportunity for residents.

1-I.D. THE PHA'S PROGRAMS

The SFHA's administrative plan is applicable to the operation of the Housing Choice Voucher program.

1-I.E. THE PHA'S COMMITMENT TO ETHICS AND SERVICE

As a public service agency, the PHA is committed to providing excellent service to HCV program participants – families and owners – in the community. The PHA's standards include:

- Administer applicable federal and state laws and regulations to achieve high ratings in compliance measurement indicators while maintaining efficiency in program operation to ensure fair and consistent treatment of clients served.
- Provide decent, safe, and sanitary housing – in compliance with program housing quality standards – for very low income families while ensuring that family rents are fair, reasonable, and affordable.
- Encourage self sufficiency of participant families and assist in the expansion of family opportunities which address educational, socio-economic, recreational and other human service's needs.
- Promote fair housing and the opportunity for very low-income families of all ethnic backgrounds to experience freedom of housing choice.
- Promote a housing program which maintains quality service and integrity while providing an incentive to private property owners to rent to very low-income families.
- Promote a market-driven housing program that will help qualified low-income families be successful in obtaining affordable housing and increase the supply of housing choices for such families.
- Create positive public awareness and expand the level of family, owner, and community support in accomplishing the PHA's mission.
- Attain and maintain a high level of standards and professionalism in day-to-day management of all program components.
- Administer an efficient, high-performing agency through continuous improvement of the PHA's support systems and commitment to our employees and their development.

The PHA will make every effort to keep program participants informed of HCV program rules and regulations, and to advise participants of how the program rules affect them.

PART II: THE HOUSING CHOICE VOUCHER (HCV) PROGRAM

1-II.A. OVERVIEW AND HISTORY OF THE PROGRAM

The intent of this section is to provide the public and staff with information related to the overall operation of the program. There have been many changes to the program since its inception in 1974 and a brief history of the program will assist the audience in understanding the program.

The United States Housing Act of 1937 (the “Act”) is responsible for the birth of federal housing program initiatives. The Act was intended to provide financial assistance to states and cities for public works projects, slum clearance and the development of affordable housing developments for low-income residents.

The Housing and Community Development (HCD) Act of 1974 created a new federally assisted housing program – the Section 8 Existing program (also known as the Section 8 Certificate program). The HCD Act represented a significant shift in federal housing strategy from locally owned public housing to privately owned rental housing.

Under the Certificate program, federal housing assistance payments were made directly to private owners of rental housing, where this housing was made available to lower-income families. Eligible families were able to select housing in the private rental market. Assuming that the housing met certain basic physical standards of quality (“housing quality standards”) and was within certain HUD-established rent limitations (“fair market rents”), the family would be able to receive rental assistance in the housing unit. Family contribution to rent was generally set at 30 percent of the family’s adjusted income, with the remainder of the rent paid by the program.

Another unique feature of the Certificate program was that the rental assistance remained with the eligible family, if the family chose to move to another privately-owned rental unit that met program requirements (in contrast to the public housing program where the rental assistance remains with the unit, should the family decide to move). Consequently, the Certificate program was characterized as tenant-based assistance, rather than unit-based assistance.

The Housing and Community Development (HCD) Act of 1987 authorized a new version of tenant-based assistance – the Section 8 Voucher program. The Voucher program was very similar to the Certificate program in that eligible families were able to select housing in the private rental market and receive assistance in that housing unit.

However, the Voucher program permitted families more options in housing selection. Rental housing still had to meet the basic housing quality standards, but there was no fair market rent limitation on rent. In addition, family contribution to rent was not set at a limit of 30 percent of adjusted income. Consequently, depending on the actual rental cost of the unit selected, a family might pay more or less than 30 percent of their adjusted income for rent.

From 1987 through 1999, public housing agencies managed both the Certificate and Voucher tenant-based assistance programs, with separate rules and requirements for each. From 1994 through 1998, HUD published a series of new rules, known as “conforming” rules, to more closely combine and align the two similar housing programs, to the extent permitted by the law.

In 1998, the Quality Housing and Work Responsibility Act (QHWRA) – also known as the Public Housing Reform Act – was signed into law. QHWRA eliminated all statutory differences between the Certificate and Voucher tenant-based programs and required that the two programs be merged into a single tenant-based assistance program, now known as the Housing Choice Voucher (HCV) program.

The HCV program was modeled closely on the pre-merger Voucher program. However, unlike the pre-merger Voucher program, the HCV program requires an assisted family to pay at least 30 percent of adjusted income for rent.

The transition of assistance from the Certificate and Voucher programs to the new HCV program began in October 1999. By October 2001, all families receiving tenant-based assistance were converted to the HCV program.

1-II.B. HCV PROGRAM BASICS

The purpose of the HCV program is to provide rental assistance to eligible families. The rules and regulations of the HCV program are determined by the U.S. Department of Housing and Urban Development. The PHA is afforded choices in the operation of the program which are included in the PHA's administrative plan, a document approved by the board of commissioners of the PHA.

The HCV program offers mobility to eligible families because they may search for suitable housing anywhere in the PHA's jurisdiction and may also be eligible to move under portability to other PHAs' jurisdictions.

When a family is determined to be eligible for the program and funding is available, the PHA issues the family a housing voucher. When the family finds a suitable housing unit and funding is available, the PHA will enter into a contract with the owner and the family will enter into a lease with the owner. Each party makes their respective payment to the owner so that the owner receives full rent.

Even though the family is determined to be eligible for the program, the owner has the responsibility of approving the family as a suitable renter. The PHA continues to make payments to the owner as long as the family is eligible and the housing unit continues to qualify under the program.

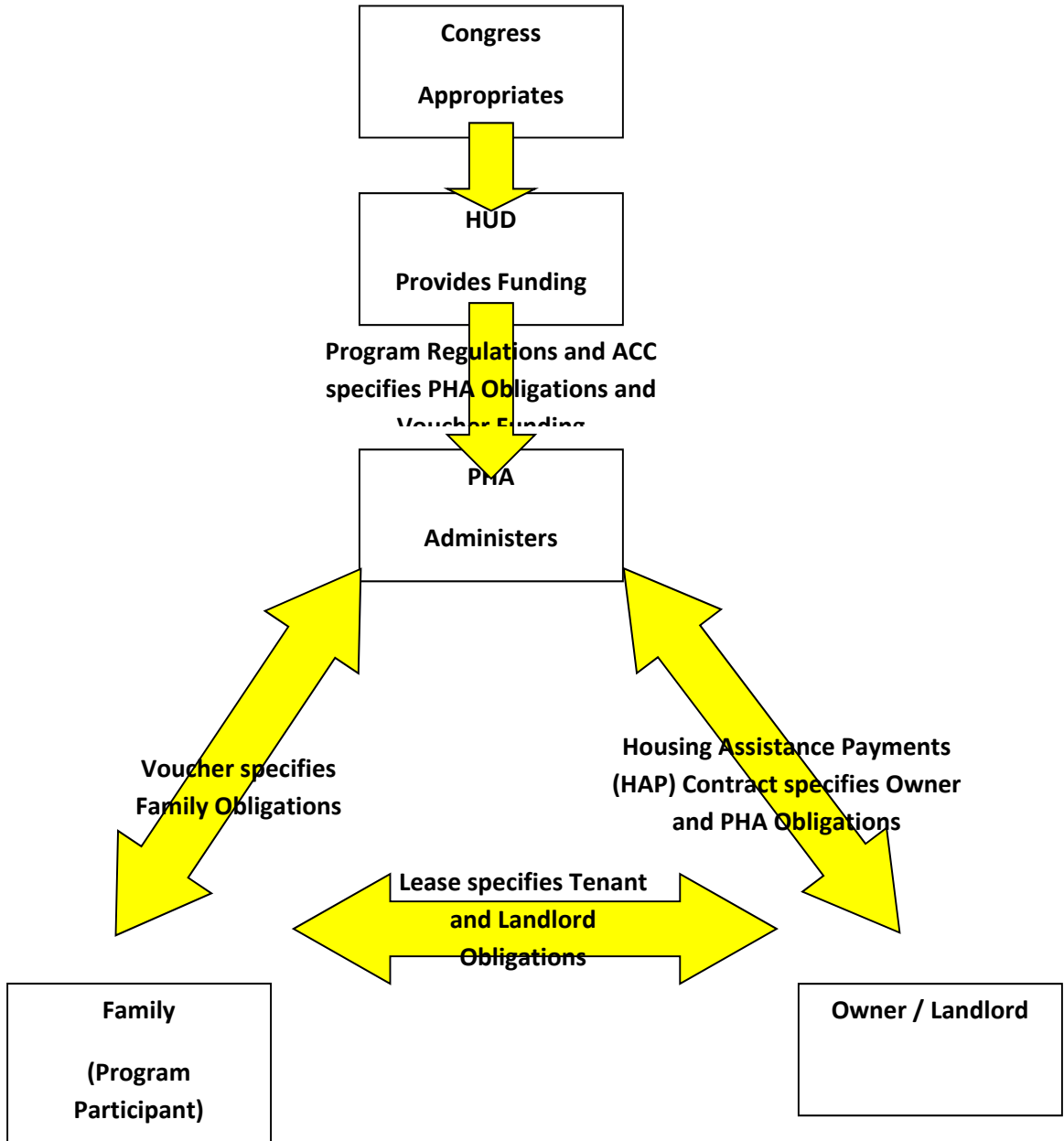
1-II.C. THE HCV PARTNERSHIPS

To administer the HCV program, the PHA enters into a contractual relationship with HUD. The PHA also enters into contractual relationships with the assisted family and the owner or landlord of the housing unit.

For the HCV program to work and be successful, all parties involved – HUD, the PHA, the owner, and the family – have important roles to play. The roles and responsibilities of all parties are defined in federal regulations and in legal documents that parties execute to participate in the program.

The chart on the following page illustrates key aspects of these relationships.

The HCV Relationships:



What does HUD do?

HUD has the following major responsibilities:

- Develop regulations, requirements, handbooks, notices and other guidance to implement HCV housing program legislation passed by Congress;
- Allocate HCV program funds to PHAs;
- Provide technical assistance to PHAs on interpreting and applying HCV program requirements;
- Monitor PHA compliance with HCV program requirements and PHA performance in program administration.

What does the PHA do?

The PHA administers the HCV program under contract with HUD and has the following major responsibilities:

- Establish local policies;
- Review applications from interested applicant families to determine whether applicants are eligible for the program;
- Maintain waiting list and select families for admission;
- Issue voucher to selected family and, if necessary, assist the family in finding a place to live;
- Conduct outreach to owners, with special attention to owners outside areas of poverty or minority concentration;
- Approve the rental unit (including assuring compliance with housing quality standards and rent reasonableness), the owner, and the tenancy;
- Make housing assistance payments to the owner in a timely manner;
- Ensure that families and their rental units continue to qualify under the program;
- Ensure that owners and families comply with program rules;
- Provide families and owners with prompt, professional service;
- Comply with all fair housing and equal opportunity requirements, HUD regulations and requirements, the Annual Contributions Contract, HUD-approved applications for funding, the PHA's administrative plan, and other applicable federal, state and local laws.

What does the Owner do?

The owner has the following major responsibilities:

- Screen families who apply for tenancy, to determine if they will be good renters.
- The PHA can provide some information to the owner, but the primary responsibility for tenant screening rests with the owner.
- The owner should consider family background factors such as rent and bill-paying history, history of caring for property, respecting the rights of others to peaceful enjoyment of the property, compliance with essential conditions of tenancy, whether the family is engaging in drug-related criminal activity or other criminal activity that might threaten others.
 - Comply with the terms of the Housing Assistance Payments contract, executed with the PHA;
 - Comply with all applicable fair housing laws and discriminate against no one;
 - Maintain the housing unit by making necessary repairs in a timely manner;
 - Collect rent due from the assisted family and otherwise comply with and enforce provisions of the dwelling lease.

What does the Family do?

The family has the following responsibilities:

- Provide the PHA with complete and accurate information, determined by the PHA to be necessary for administration of the program;
- Make their best and most timely efforts to find a place to live that is suitable for them and that qualifies for the program;
- Attend all appointments scheduled by the PHA;
- Allow the PHA to inspect the unit at reasonable times and after reasonable notice;
- Take responsibility for care of the housing unit, including any violations of housing quality standards caused by the family;
- Comply with the terms of the lease with the owner;
- Comply with the family obligations of the voucher;
- Not commit serious or repeated violations of the lease;
- Not engage in drug-related or violent criminal activity;
- Notify the PHA and the owner before moving or terminating the lease;
- Use the assisted unit only for residence and as the sole residence of the family. Not sublet the unit, assign the lease, or have any interest in the unit;
- Promptly notify the PHA of any changes in family composition;
- Not commit fraud, bribery, or any other corrupt or criminal act in connection with any housing programs.

If all parties fulfill their obligations in a professional and timely manner, the program responsibilities will be fulfilled effectively.

1-II.D. APPLICABLE REGULATIONS

Applicable regulations include:

- 24 CFR Part 5: General Program Requirements
- 24 CFR Part 8: Nondiscrimination
- 24 CFR Part 35: Lead-Based Paint
- 24 CFR Part 982: Section 8 Tenant-Based Assistance: Housing Choice Voucher Program
- 24 CFR Part 983: Project-Based Vouchers
- 24 CFR Part 985: The Section 8 Management Assessment Program (SEMAP)

PART III: THE HCV ADMINISTRATIVE PLAN

1-III.A. OVERVIEW AND PURPOSE OF THE PLAN

The administrative plan is required by HUD. The purpose of the administrative plan is to establish policies for carrying out the programs in a manner consistent with HUD requirements and local goals and objectives contained in the PHA's agency plan. This administrative plan is a supporting document to the PHA agency plan, and is available for public review as required by CFR 24 Part 903.

This administrative plan is set forth to define the PHA's local policies for operation of the housing programs in the context of federal laws and regulations. All issues related to Section 8 not addressed in this document are governed by such federal regulations, HUD handbooks and guidebooks, notices and other applicable law. The policies in this administrative plan have been designed to ensure compliance with the consolidated ACC and all HUD-approved applications for program funding.

The PHA is responsible for complying with all changes in HUD regulations pertaining to the HCV program. If such changes conflict with this plan, HUD regulations will have precedence.

Administration of the HCV program and the functions and responsibilities of PHA staff shall be in compliance with the PHA's personnel policy and HUD's Section 8 regulations as well as all federal, state and local fair housing laws and regulations.

1-III.B. CONTENTS OF THE PLAN [24 CFR 982.54]

HUD regulations contain a list of what must be included in the administrative plan. The PHA administrative plan must cover PHA policies on these subjects:

- Selection and admission of applicants from the PHA waiting list, including any PHA admission preferences, procedures for removing applicant names from the waiting list, and procedures for closing and reopening the PHA waiting list (Chapter 4);
- Issuing or denying vouchers, including PHA policy governing the voucher term and any extensions or suspensions of the voucher term. 'Suspension' means stopping the clock on the term of a family's voucher after the family submits a request for approval of the tenancy. If the PHA decides to allow extensions or suspensions of the voucher term, the PHA administrative plan must describe how the PHA determines whether to grant extensions or suspensions, and how the PHA determines the length of any extension or suspension (Chapter 5);
- Any special rules for use of available funds when HUD provides funding to the PHA for a special purpose (e.g., desegregation), including funding for specified families or a specified category of families (Chapter 4);

- Occupancy policies, including definition of what group of persons may qualify as a 'family', definition of when a family is considered to be 'continuously assisted'; standards for denying admission or terminating assistance based on criminal activity or alcohol abuse in accordance with 982.553 (Chapters 3 and 12);
- Encouraging participation by owners of suitable units located outside areas of low income or minority concentration (Chapter 13);
- Assisting a family that claims that illegal discrimination has prevented the family from leasing a suitable unit (Chapter 2);
- Providing information about a family to prospective owners (Chapters 3 and 9);
- Disapproval of owners (Chapter 13);
- Subsidy standards (Chapter 5);
- Family absence from the dwelling unit (Chapter 12) ;
- How to determine who remains in the program if a family breaks up (Chapter 3);
- Informal review procedures for applicants (Chapter 16);
- Informal hearing procedures for participants (Chapter 16);
- The process for establishing and revising voucher payment standards (Chapter 16);
- The method of determining that rent to owner is a reasonable rent (initially and during the term of a HAP contract) (Chapter 8);
- Special policies concerning special housing types in the program (e.g., use of shared housing) (Chapter 15);
- Policies concerning payment by a family to the PHA of amounts the family owes the PHA (Chapter 16);
- Interim redeterminations of family income and composition (Chapter 11);
- Restrictions, if any, on the number of moves by a participant family (Chapter 10);
- Approval by the board of commissioners or other authorized officials to charge the administrative fee reserve (Chapter 16);
- Procedural guidelines and performance standards for conducting required housing quality standards inspections (Chapter 8); and
- PHA screening of applicants for family behavior or suitability for tenancy (Chapter 3).

Mandatory vs. Discretionary Policy

HUD makes a distinction between:

- Mandatory policies: those driven by legislation, regulations, current handbooks, notices, and legal opinions, and
- Optional, non-binding guidance, including guidebooks, notices that have expired and recommendations from individual HUD staff.

HUD expects PHAs to develop policies and procedures that are consistent with mandatory policies and to make clear the optional policies the PHA has adopted. The PHA's administrative plan is the foundation of those policies and procedures. HUD's directions require PHAs to make policy choices that provide guidance to staff and consistency to program applicants and participants.

Following HUD guidance, even though it is not mandatory, provides a PHA with a "safe harbor." HUD has already determined that the recommendations and suggestions it makes are consistent with mandatory policies. If a PHA adopts an alternative strategy, it must make its own determination that the alternative approach is consistent with legislation, regulations, and other mandatory requirements. There may be very good reasons for adopting a policy or procedure that is different than HUD's safe harbor, but PHAs should carefully think through those decisions.

1-III.C. ORGANIZATION OF THE PLAN

The Plan is organized to provide information to users in particular areas of operation.

1-III.D. UPDATING AND REVISING THE PLAN

The PHA will revise this administrative plan as needed to comply with changes in HUD regulations. The original plan and any changes must be approved by the board of commissioners of the agency, the pertinent sections included in the Agency Plan, and a copy provided to HUD.

SFHA Policy

The PHA will review and update the plan at least once a year, and more often if needed, to reflect changes in regulations, PHA operations, or when needed to ensure staff consistency in operation.

Chapter 2
FAIR HOUSING AND EQUAL OPPORTUNITY
INTRODUCTION

This chapter explains the laws and HUD regulations requiring PHAs to affirmatively further civil rights and fair housing in all federally-assisted housing programs. The letter and spirit of these laws are implemented through consistent policy and processes. The responsibility to further nondiscrimination pertains to all areas of the PHA's housing choice voucher (HCV) operations.

This chapter describes HUD regulations and PHA policies related to these topics in three parts:

Part I: Nondiscrimination. This part presents the body of laws and regulations governing the responsibilities of the PHA regarding nondiscrimination.

Part II: Policies Related to Persons with Disabilities. This part discusses the rules and policies of the housing choice voucher program related to reasonable accommodation for persons with disabilities. These rules and policies are based on the Fair Housing Act (42.U.S.C.) and Section 504 of the Rehabilitation Act of 1973, and incorporate guidance from the Joint Statement of The Department of Housing and Urban Development and the Department of Justice (DOJ), issued May 17, 2004.

Part III: Prohibition of Discrimination Against Limited English Proficiency Persons. This part details the obligations of the PHA to ensure meaningful access to the HCV program and its activities by persons with limited English proficiency (LEP). This part incorporates the Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons published January 22, 2007, in the *Federal Register*.

PART I: NONDISCRIMINATION

2-I.A. OVERVIEW

Federal laws require PHAs to treat all applicants and participants equally, providing the same quality of service, regardless of family characteristics and background. Federal law prohibits discrimination in housing on the basis of race, color, religion, sex, national origin, age, familial status, and disability. In addition, HUD regulations provide for additional protections regarding sexual orientation, gender identity, and marital status. The PHA will comply fully with all federal, state, and local nondiscrimination laws, and with rules and regulations governing fair housing and equal opportunity in housing and employment, including:

- Title VI of the Civil Rights Act of 1964
- Title VIII of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988)
- Executive Order 11063
- Section 504 of the Rehabilitation Act of 1973
- The Age Discrimination Act of 1975
- Title II of the Americans with Disabilities Act (to the extent that it applies, otherwise Section 504 and the Fair Housing Amendments govern)
- Violence Against Women Reauthorization Act of 2005 (VAWA)
- The Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule, published in the *Federal Register* February 3, 2012
- When more than one civil rights law applies to a situation, the laws will be read and applied together
- Any applicable state laws or local ordinances and any legislation protecting individual rights of tenants, applicants, or staff that may subsequently be enacted will also apply

2-I.B. NONDISCRIMINATION

Federal regulations prohibit discrimination against certain protected classes and other groups of people. State and local requirements, as well as PHA policies, can prohibit discrimination against additional classes of people.

No person shall on the ground of race, color, sex, religion, national or ethnic origin, familial status or disability to be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under the SFHA housing programs (called “protected classes”).

Familial status includes children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18.

The SFHA will not discriminate on the basis of marital status, gender identity or sexual orientation. [FR Notice 02/03/12]

The PHA will not use any of these factors to:

- Deny to any family the opportunity to apply for housing, nor deny to any qualified applicant the opportunity to participate in the housing choice voucher program
- Provide housing that is different from that provided to others
- Subject anyone to segregation or disparate treatment
- Restrict anyone's access to any benefit enjoyed by others in connection with the housing program
- Treat a person differently in determining eligibility or other requirements for admission
- Steer an applicant or participant toward or away from a particular area based any of these factors
- Deny anyone access to the same level of services
- Deny anyone the opportunity to participate in a planning or advisory group that is an integral part of the housing program
- Discriminate in the provision of residential real estate transactions
- Discriminate against someone because they are related to or associated with a member of a protected class
- Publish or cause to be published an advertisement or notice indicating the availability of housing that prefers or excludes persons who are members of a protected class.

Providing Information to Families and Owners

The PHA must take steps to ensure that families and owners are fully aware of all applicable civil rights laws. As part of the briefing process, the PHA must provide information to HCV applicant families about civil rights requirements and the opportunity to rent in a broad range of neighborhoods [24 CFR 982.301]. The Housing Assistance Payment (HAP) contract informs owners of the requirement not to discriminate against any person because of race, color, religion, sex, national origin, age, familial status, or disability in connection with the contract.

Discrimination Complaints

If an applicant or participant believes that any family member has been discriminated against by the PHA or an owner, the family should advise the PHA. HUD requires the PHA to make every reasonable attempt to determine whether the applicant's or participant's assertions have merit and take any warranted corrective action. In addition, the PHA is required to provide the applicant or participant with information about how to file a discrimination complaint [24 CFR 982.304].

SFHA Policy

Applicants or participants who believe that they have been subject to unlawful discrimination may notify the PHA either orally or in writing.

The PHA will attempt to remedy discrimination complaints made against the PHA.

PART II: POLICIES RELATED TO PERSONS WITH DISABILITIES

2-II.A. OVERVIEW

One type of disability discrimination prohibited by the Fair Housing Act is the refusal to make reasonable accommodation in rules, policies, practices, or services when such accommodation may be necessary to afford a person with a disability the equal opportunity to use and enjoy a program or dwelling under the program.

The PHA must ensure that persons with disabilities have full access to the PHA's programs and services. This responsibility begins with the first inquiry of an interested family and continues through every programmatic area of the HCV program.

SFHA Policy

The PHA will ask all applicants and participants if they require any type of accommodations, in writing, on the intake application, reexamination documents, and notices of adverse action by the PHA, by including the following language:

“If you or anyone in your family is a person with disabilities, and you require a specific accommodation in order to fully utilize our programs and services, please contact the housing authority.”

A specific name and phone number will be indicated as the contact for requests for accommodation for persons with disabilities.

2-II.B. DEFINITION OF REASONABLE ACCOMMODATION

A person with a disability may require special accommodations in order to have equal access to the HCV program. The types of reasonable accommodations the PHA can provide include changes, exceptions or adjustments to a rule, policy, practice, or service.

Federal regulations stipulate that requests for accommodations will be considered reasonable if they do not create an "undue financial and administrative burden" on the PHA, or result in a "fundamental alteration" in the nature of the program or service offered. A fundamental alteration is a modification that alters the essential nature of a provider's operations.

Types of Reasonable Accommodations

When needed, the PHA must modify normal procedures to accommodate the needs of a person with disabilities. Examples include:

- Permitting applications and reexaminations to be completed by mail
- Conducting home visits
- Using higher payment standards (either within the acceptable range or with HUD approval of a payment standard outside the PHA range) if the PHA determines this is necessary to enable a person with disabilities to obtain a suitable housing unit
- Providing time extensions for locating a unit when necessary because of lack of availability of accessible units or special challenges of the family in seeking a unit
- Permitting an authorized designee or advocate to participate in the application or certification process and any other meetings with PHA staff
- Displaying posters and other housing information in locations throughout the PHA's office in such a manner as to be easily readable from a wheelchair

2-II.C. REQUEST FOR AN ACCOMMODATION

If an applicant or participant indicates that an exception, change, or adjustment to a rule, policy, practice, or service is needed because of a disability, HUD requires that the PHA treat the information as a request for a reasonable accommodation, even if no formal request is made [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].

The family must explain what type of accommodation is needed to provide the person with the disability full access to the PHA's programs and services.

If the need for the accommodation is not readily apparent or known to the PHA, the family must explain the relationship between the requested accommodation and the disability. There must be an identifiable relationship, or nexus, between the requested accommodation and the individual's disability.

SFHA Policy

The PHA will encourage the family to make its request in writing using a reasonable accommodation request form. However, the PHA will consider the accommodation any time the family indicates that an accommodation is needed whether or not a formal written request is submitted.

2-II.D. VERIFICATION OF DISABILITY

The regulatory civil rights definition for persons with disabilities is provided in Exhibit 2-1 at the end of this chapter. The definition of a person with a disability for the purpose of obtaining a reasonable accommodation is much broader than the HUD definition of disability which is used for waiting list preferences and income allowances.

Before providing an accommodation, the PHA must determine that the person meets the definition of a person with a disability, and that the accommodation will enhance the family's access to the PHA's programs and services.

If a person's disability is obvious or otherwise known to the PHA, and if the need for the requested accommodation is also readily apparent or known, no further verification will be required [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].

If a family indicates that an accommodation is required for a disability that is not obvious or otherwise known to the PHA, the PHA must verify that the person meets the definition of a person with a disability, and that the limitations imposed by the disability require the requested accommodation.

When verifying a disability, the PHA will follow the verification policies provided in Chapter 7. All information related to a person's disability will be treated in accordance with the confidentiality policies provided in Chapter 16. In addition to the general requirements that govern all verification efforts, the following requirements apply when verifying a disability:

- Third-party verification must be obtained from an individual identified by the family who is competent to make the determination. A doctor or other medical professional, a peer support group, a non-medical service agency, or a reliable third party who is in a position to know about the individual's disability may provide verification of a disability [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act]
- The PHA must request only information that is necessary to evaluate the disability-related need for the accommodation. The PHA will not inquire about the nature or extent of any disability.
- Medical records will not be accepted or retained in the participant file.

SFHA Policy

Disability is defined as any physical or mental impairment that limits one or more of their major life activities.

2-II.E. APPROVAL/DENIAL OF A REQUESTED ACCOMMODATION

[Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].

The PHA must approve a request for an accommodation if the following three conditions are met:

- The request was made by or on behalf of a person with a disability.
- There is a disability-related need for the accommodation.
- The requested accommodation is reasonable, meaning it would not impose an undue financial and administrative burden on the PHA, or fundamentally alter the nature of the PHA's HCV operations (including the obligation to comply with HUD requirements and regulations).

Requests for accommodations must be assessed on a case-by-case basis, taking into account factors such as the cost of the requested accommodation, the financial resources of the PHA at the time of the request, the benefits that the accommodation would provide to the family, and the availability of alternative accommodations that would effectively meet the family's disability-related needs.

Before making a determination whether to approve the request, the PHA may enter into discussion and negotiation with the family, request more information from the family, or may require the family to sign a consent form so that the PHA may verify the need for the requested accommodation.

SFHA Policy

After a request for an accommodation is presented, the PHA will respond, in writing, within 30 calendar days.

If the PHA denies a request for an accommodation because there is no relationship, or nexus, found between the disability and the requested accommodation, the notice will inform the family of the right to appeal the PHA's decision through the grievance process (see Chapter 16).

If the PHA denies a request for an accommodation because it is not reasonable (it would impose an undue financial and administrative burden or fundamentally alter the nature of the PHA's operations), the PHA will discuss with the family whether an alternative accommodation could effectively address the family's disability-related needs without a fundamental alteration to the HCV program and without imposing an undue financial and administrative burden.

If the PHA believes that there is no reasonable alternative to the reasonable accommodation request, the PHA will notify the family, in writing, of its determination within 30 calendar days from the date of the most recent discussion or communication with the family. The notice will inform the family of the right to appeal the PHA's decision through the grievance process (see Chapter 16).

2-II.F. PROGRAM ACCESSIBILITY FOR PERSONS WITH HEARING OR VISION IMPAIRMENTS

HUD regulations require the PHA to ensure that persons with disabilities related to hearing and vision have reasonable access to the PHA's programs and services [24 CFR 8.6].

At the initial point of contact with each applicant, the PHA shall inform all applicants of alternative forms of communication that can be used other than plain language paperwork.

SFHA Policy

To meet the needs of persons with hearing impairments, TTD/TTY (text telephone display / teletype) communication will be available.

To meet the needs of persons with vision impairments, large-print and audio versions of key program documents will be made available upon request. When visual aids are used in public meetings or presentations, or in meetings with PHA staff, one-on-one assistance will be provided upon request.

Additional examples of alternative forms of communication are sign language interpretation; having material explained orally by staff; or having a third party adult representative (a friend, relative or advocate, named by the applicant) to receive, interpret and explain housing materials and be present at all meetings.

2-II.G. PHYSICAL ACCESSIBILITY

The PHA must comply with a variety of regulations pertaining to physical accessibility, including the following:

- Notice PIH 2006-13
- Section 504 of the Rehabilitation Act of 1973
- The Americans with Disabilities Act of 1990
- The Architectural Barriers Act of 1968
- The Fair Housing Act of 1988

The PHA's policies concerning physical accessibility must be readily available to applicants and participants. They can be found in three key documents:

- This plan describes the key policies that govern the PHA's responsibilities with regard to physical accessibility.
- Notice PIH 2006-13 summarizes information about pertinent laws and implementing regulations related to non-discrimination and accessibility in federally-funded housing programs.
- The PHA Plan provides information about self-evaluation, needs assessment, and transition plans.

The design, construction, or alteration of PHA facilities must conform to the Uniform Federal Accessibility Standards (UFAS). Newly-constructed facilities must be designed to be readily accessible to and usable by persons with disabilities. Alterations to existing facilities must be accessible to the maximum extent feasible, defined as not imposing an undue financial and administrative burden on the operations of the HCV program.

When issuing a voucher to a family that includes an individual with disabilities, the PHA will include a current list of available accessible units known to the PHA and will assist the family in locating an available accessible unit, if necessary.

In general, owners must permit the family to make reasonable modifications to the unit. However, the owner is not required to pay for the modification and may require that the unit be restored to its original state at the family's expense when the family moves.

2-II.H. DENIAL OR TERMINATION OF ASSISTANCE

A PHA's decision to deny or terminate the assistance of a family that includes a person with disabilities is subject to consideration of reasonable accommodation [24 CFR 982.552 (2)(iv)].

When applicants with disabilities are denied assistance, the notice of denial must inform them of the PHA's informal review process and their right to request a hearing. In addition, the notice must inform applicants with disabilities of their right to request reasonable accommodations to participate in the informal hearing process.

When a participant family's assistance is terminated, the notice of termination must inform them of the PHA's informal hearing process and their right to request a hearing and reasonable accommodation.

When reviewing reasonable accommodation requests, the PHA must consider whether any mitigating circumstances can be verified to explain and overcome the problem that led to the PHA's decision to deny or terminate assistance. If a reasonable accommodation will allow the family to meet the requirements, the PHA must make the accommodation.

PART III: IMPROVING ACCESS TO SERVICES FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)

2-III.A. OVERVIEW

Language for Limited English Proficiency Persons (LEP) can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by the HCV program. In certain circumstances, failure to ensure that LEP persons can effectively participate in or benefit from federally-assisted programs and activities may violate the prohibition under Title VI against discrimination on the basis of national origin. This part incorporates the Final Guidance to Federal Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons, published January 22, 2007, in the *Federal Register*.

The PHA will take affirmative steps to communicate with people who need services or information in a language other than English. These persons will be referred to as Persons with Limited English Proficiency (LEP).

LEP is defined as persons who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English. For the purposes of this administrative plan, LEP persons are HCV applicants and participants, and parents and family members of applicants and participants.

In order to determine the level of access needed by LEP persons, the PHA will balance the following four factors: (1) the number or proportion of LEP persons eligible to be served or likely to be encountered by the Housing Choice Voucher program; (2) the frequency with which LEP persons come into contact with the program; (3) the nature and importance of the program, activity, or service provided by the program to people's lives; and (4) the resources available to the PHA and costs. Balancing these four factors will ensure meaningful access by LEP persons to critical services while not imposing undue burdens on the PHA.

The SFHA's LEP Plan is included as Appendix A of this Administrative Plan.

EXHIBIT 2-1: DEFINITION OF A PERSON WITH A DISABILITY UNDER FEDERAL CIVIL RIGHTS LAWS [24 CFR Parts 8.3 and 100.201]

A person with a disability, as defined under federal civil rights laws, is any person who:

- Has a physical or mental impairment that substantially limits one or more of the major life activities of an individual, or
- Has a record of such impairment, or
- Is regarded as having such impairment

The phrase “physical or mental impairment” includes:

- Any physiological disorder or condition, cosmetic or disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine; or
- Any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term “physical or mental impairment” includes, but is not limited to: such diseases and conditions as orthopedic, visual, speech and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, drug addiction and alcoholism.

“Major life activities” includes, but is not limited to, caring for oneself, performing manual tasks, walking, seeing, hearing, breathing, learning, and/or working.

“Has a record of such impairment” means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities.

“Is regarded as having an impairment” is defined as having a physical or mental impairment that does not substantially limit one or more major life activities but is treated by a public entity (such as the PHA) as constituting such a limitation; has none of the impairments defined in this section but is treated by a public entity as having such an impairment; or has a physical or mental impairment that substantially limits one or more major life activities, only as a result of the attitudes of others toward that impairment.

The definition of a person with disabilities does not include:

- Current illegal drug users
- People whose alcohol use interferes with the rights of others
- Persons who objectively pose a direct threat or substantial risk of harm to others that cannot be controlled with a reasonable accommodation under the HCV program

The above definition of disability determines whether an applicant or participant is entitled to any of the protections of federal disability civil rights laws. Thus, a person who does not meet this disability is not entitled to a reasonable accommodation under federal civil rights and fair housing laws and regulations.

The HUD definition of a person with a disability is much narrower than the civil rights definition of disability. The HUD definition of a person with a disability is used for purposes of receiving the disabled family preference, the \$400 elderly/disabled household deduction, the \$480 dependent deduction, the allowance for medical expenses, or the allowance for disability assistance expenses.

The definition of a person with a disability for purposes of granting a reasonable accommodation request is much broader than the HUD definition of disability. Many people will not qualify as a disabled person under the HCV program, yet an accommodation is needed to provide equal opportunity.

Chapter 3

ELIGIBILITY

INTRODUCTION

The PHA is responsible for ensuring that every individual and family admitted to the HCV program meets all program eligibility requirements. This includes any individual approved to join the family after the family has been admitted to the program. The family must provide any information needed by the PHA to confirm eligibility and determine the level of the family's assistance.

To be eligible for the HCV program:

- The applicant family must:
 - Qualify as a family as defined by HUD and the PHA.
 - Have income at or below HUD-specified income limits.
 - Qualify on the basis of citizenship or the eligible immigrant status of family members.
 - Provide social security number information for family members as required.
 - Consent to the PHA's collection and use of family information as provided for in PHA-provided consent forms.
- The PHA must determine that the current or past behavior of household members does not include activities that are prohibited by HUD or the PHA.

This chapter contains three parts:

Part I: Definitions of Family and Household Members. This part contains HUD and PHA definitions of family and household members and explains initial and ongoing eligibility issues related to these members.

Part II: Basic Eligibility Criteria. This part discusses income eligibility, and rules regarding citizenship, social security numbers, and family consent.

Part III: Denial of Assistance. This part covers factors related to an applicant's past or current conduct (e.g. criminal activity) that can cause the PHA to deny assistance.

PART I: DEFINITIONS OF FAMILY AND HOUSEHOLD MEMBERS

3-I.A. OVERVIEW

Some eligibility criteria and program rules vary depending upon the composition of the family requesting assistance. In addition, some requirements apply to the family as a whole and others apply to individual persons who will live in the assisted unit. This part provides information that is needed to correctly identify family and household members, and to apply HUD's eligibility rules.

3-I.B. FAMILY AND HOUSEHOLD [24 CFR 982.201(c); HUD-50058 IB, p. 13; FR Notice 02/03/12]

The terms *family* and *household* have different meanings in the HCV program.

Family

To be eligible for assistance, an applicant must qualify as a family. *Family* as defined by HUD includes, but is not limited to the following, regardless actual or perceived sexual orientation, gender identity, or marital status, a single person, who may be an elderly person, disabled person, near-elderly person, or any other single person; or a group of persons residing together. Such group includes, but is not limited to a family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family), an elderly family, a near-elderly family, a disabled family, a displaced family, or the remaining member of a tenant family. The PHA has the discretion to determine if any other group of persons qualifies as a family.

Gender Identity means actual or perceived gender characteristics.

Sexual orientation means homosexuality, heterosexuality, or bisexuality.

SFHA Policy

A family also includes two or more individuals who are not related by blood, marriage, adoption, or other operation of law, but who either can demonstrate that they have lived together previously or certify that each individual's income and other resources will be available to meet the needs of the family. This definition includes but is not limited to:

- a) A family with or without children (the temporary absence of a child from the home due to placement in foster care shall not be considered in determining family composition and family size);
- b) An elderly family;
- c) A near-elderly family;
- d) A disabled family;
- e) A displaced family;
- f) The remaining member of a tenant family; and
- g) A single person who is not elderly or displaced person with disabilities, or the remaining member of a tenant family.

Each family must identify the individuals to be included in the family at the time of application, and must update this information if the family's composition changes.

Verification shall be established by utility bills that include the family name and address; bank statements that include the family name and address; and/or third party correspondence to family address.

Household

Household is a broader term that includes additional people who, with the PHA's permission, live in an assisted unit, such as live-in aides, foster children, and foster adults.

3-I.C. FAMILY BREAK-UP AND REMAINING MEMBER OF TENANT FAMILY

Family Break-up [24 CFR 982.315]

The PHA has discretion to determine which members of an assisted family continue to receive assistance if the family breaks up. However, if a court determines the disposition of property between members of the assisted family in a divorce or separation decree, the PHA is bound by the court's determination of which family members continue to receive assistance.

SFHA Policy

When a family on the waiting list breaks up into two otherwise eligible families, only one of the new families may retain the original application date. Other former family members may make a new application with a new application date if the waiting list is open.

If a family breaks up into two otherwise eligible families while receiving assistance, only one of the new families will continue to be assisted.

If a court determines the disposition of property between members of the applicant or resident family in a divorce or separation decree, the PHA will abide by the court's determination. This includes cooperating with law enforcement authorities to enforce civil protection orders issued for the protection of victims and addressing the distribution of personal property among household members in cases where a family breaks up.

In the absence of a judicial decision, or an agreement among the original family members, the PHA will determine which family retains their placement on the waiting list, or will continue to receive assistance taking into consideration the following factors: (1) the interest of any minor children, including custody arrangements, (2) the interest of any ill, elderly, or disabled family members, (3) any possible risks to family members as a result of domestic violence or criminal activity, and (4) the recommendations of social service professionals. If the family break –up results from an occurrence of domestic violence, dating violence, or stalking as provided in 24 CFR part 5, subpart L, the SFHA must ensure that the victim retain assistance.

Remaining Member of a Tenant Family [24 CFR 5.403]

The HUD definition of family includes the *remaining member of a tenant family*, which is a member of an assisted family who remains in the unit when other members of the family have left the unit. Household members such as live-in aides, foster children, and foster adults do not qualify as remaining members of a family.

If dependents are the only “remaining members of a tenant family” and there is no family member able to assume the responsibilities of the head of household, see Chapter 6, Section 6-I.B, for the policy on “Caretakers for a Child.”

3-I.D. HEAD OF HOUSEHOLD [24 CFR 5.504(b)]

Head of household means the adult member of the family who is considered the head for purposes of determining income eligibility and rent. The head of household is responsible for ensuring that the family fulfills all of its responsibilities under the program, alone or in conjunction with a co-head or spouse.

SFHA Policy

The family may designate any qualified family member as the head of household.

The head of household must have the legal capacity to enter into a lease under state and local law. A minor who is emancipated under state law may be designated as head of household.

3-I.E. SPOUSE, COHEAD, AND OTHER ADULT

A family may have a spouse or co-head, but not both [HUD-50058 IB, p. 13].

Spouse means the marriage partner of the head of household. The term “spouse” does not apply to friends, roommates, or significant others who are not marriage partners. A minor who is emancipated under state law may be designated as a spouse.

A *co-head* is an individual in the household who is equally responsible with the head of household for ensuring that the family fulfills all of its responsibilities under the program, but who is not a spouse. A family can have only one co-head. Minors who are emancipated under state law may be designated as a co-head.

Other adult means a family member, other than the head, spouse, or co-head, who is 18 years of age or older. Foster adults and live-in aides are not considered other adults. [HUD-50058 IB. p. 14].

3-I.F. DEPENDENT [24 CFR 5.603]

A *dependent* is a family member who is under 18 years of age or a person of any age who is a person with a disability or a full-time student, except that the following persons can never be dependents: the head of household, spouse, co-head, foster children/adults and live-in aides. Identifying each dependent in the family is important because each dependent qualifies the family for a deduction from annual income as described in Chapter 6.

Joint Custody of Dependents

SFHA Policy

Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family 50 percent or more of the time.

When more than one applicant or participant family is claiming the same dependents as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim the dependents. If there is a dispute about which family should claim them, the PHA will make the determination based on available documents such as court orders, or an IRS return showing which family has claimed the child for income tax purposes.

3-I.G. FULL-TIME STUDENT [24 CFR 5.603; HCV GB, p. 5-29]

A *full-time student* (FTS) is a person who is attending school or vocational training on a full-time basis. The time commitment or subject load that is needed to be full-time is defined by the educational institution.

Identifying each FTS is important because: (1) each family member that is an FTS, other than the head, spouse, or co-head, qualifies the family for a dependent deduction, and (2) the income of such an FTS is treated differently from the income of other family members.

3-II.G. FULL-TIME COLLEGE STUDENTS OF NON-PARENTAL/GUARDIAN HOUSEHOLDS

Full-time college students of non-parental/guardian households are not eligible for admission to the Housing Choice Voucher, Project-based Voucher, Public Housing and Housing Choice Voucher Rehabilitation Programs unless students meet the following eligibility standards:

1. The student must be 18 and/or be an emancipated minor under state law.
2. The student must be income-eligible for admission.

The Housing Authority is required to verify and include the following source of income for full-time college students of non-parental/guardian household:

1. Financial support such as money, food, clothing, personal items and entertainment. The financial support must come from an outside source such as parents or guardians in the form of “periodic and determinable allowance” or “regular contributions or gifts.”

2. Athletic scholarship that is available for housing cost.

3-I.H. ELDERLY AND NEAR-ELDERLY PERSONS, AND ELDERLY FAMILY [24 CFR 5.100 and 5.403, FR Notice 02/03/12]

Elderly Persons

An *elderly person* is a person who is at least 62 years of age.

Near-Elderly Persons

A *near-elderly person* is a person who is 50-61 years of age.

Elderly Family

An *elderly family* is one in which the head, spouse, co-head, or sole member is an elderly person. Identifying elderly families is important because these families qualify for special deductions from income as described in Chapter 6.

3-I.I. PERSONS WITH DISABILITIES AND DISABLED FAMILY [24 CFR 5.403, FR Notice 02/03/12]

Persons with Disabilities

Under the HCV program, special rules apply to persons with disabilities and to any family whose head, spouse, or co-head is a person with disabilities. The technical definitions of individual with handicaps and persons with disabilities are provided in Exhibit 3-1 at the end of this chapter. These definitions are used for a number of purposes including ensuring that persons with disabilities are not discriminated against based upon disability.

As discussed in Chapter 2, the PHA must make all aspects of the HCV program accessible to persons with disabilities and consider reasonable accommodations requested based upon a person's disability.

Disabled Family

A *disabled family* is one in which the head, spouse, or co-head is a person with disabilities. Identifying disabled families is important because these families qualify for special deductions from income as described in Chapter 6.

Even though persons with drug or alcohol dependencies are considered persons with disabilities for the purpose of non-discrimination, this does not prevent the PHA from denying assistance for reasons related to alcohol and drug abuse following policies found in Part III of this chapter, or from terminating assistance following the policies in Chapter 12.

3-I.J. GUESTS [24 CFR 5.100]

A *guest* is a person temporarily staying in the unit with the consent of a member of the household who has express or implied authority to so consent.

SFHA Policy

A guest can remain in the assisted unit no longer than 30 consecutive days or a total of 90 cumulative calendar days during any 12-month period.

Children who are subject to a joint custody arrangement or for whom a family has visitation privileges, that are not included as a family member because they live outside of the assisted household more than 50 percent of the time, are not subject to the time limitations of guests as described above.

A family may request an exception to this policy for valid reasons (e.g., care of a relative recovering from a medical procedure is expected to last 40 consecutive days). An exception will not be made unless the family can identify and provide documentation of the residence to which the guest will return.

3-I.K. FOSTER CHILDREN AND FOSTER ADULTS

Foster adults are usually persons with disabilities, unrelated to the tenant family, who are unable to live alone [24 CFR 5.609].

The term *foster child* is not specifically defined by the regulations.

Foster children and foster adults that are living with an applicant or assisted family are considered household members but not family members. The income of foster children/adults is not counted in family annual income, and foster children/adults do not qualify for a dependent deduction [24 CFR 5.603; HUD-50058 IB, p. 13].

SFHA Policy

A foster child is a child, or a non-minor dependent as defined in California Welfare and Institution Code section 1400(v) that is in the legal guardianship or custody of a state, county, or private adoption or foster care agency, yet is cared for by foster parents in their own homes, under some kind of short-term or long-term foster care arrangement with the custodial agency.

A foster child or foster adult shall be allowed to reside in the unit if their presence would not result in a violation of HQS space standards according to 24 CFR 982.401.

Children that are temporarily absent from the home as a result of placement in foster care are discussed in Section 3-I.L.

3-I.L. ABSENT FAMILY MEMBERS

Individuals may be absent from the family, either temporarily or permanently, for a variety of reasons including educational activities, placement in foster care, employment, illness, incarceration, and court order.

Definitions of Temporarily and Permanently Absent

SFHA Policy

Generally an individual who is or is expected to be absent from the assisted unit for 180 consecutive days or less is considered temporarily absent and continues to be considered a family member. Generally an individual who is or is expected to be absent from the assisted unit for more than 180 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.

Absent Students

SFHA Policy

When someone who has been considered a family member attends school away from home, the person will continue to be considered a family member unless information becomes available to the PHA indicating that the student has established a separate household or the family declares that the student has established a separate household.

Absences Due to Placement in Foster Care [24 CFR 5.403]

Children temporarily absent from the home as a result of placement in foster care are considered members of the family.

SFHA Policy

If a child has been placed in foster care, the PHA will verify with the appropriate agency whether and when the child is expected to be returned to the home. Unless the agency confirms that the child has been permanently removed from the home, the child will be counted as a family member.

Absent Head, Spouse, or Co-head

SFHA Policy

An employed head, spouse, or co-head absent from the unit more than 180 consecutive days due to employment will continue to be considered a family member.

Family Members Permanently Confined for Medical Reasons [HCV GB, p. 5-22]

If a family member is confined to a nursing home or hospital on a permanent basis, that person is no longer considered a family member and the income of that person is not counted [HCV GB, p. 5-22].

SFHA Policy

A Family Member confined to a nursing home or hospital on a permanent basis is not considered a family member.

If there is a question about the status of a family member, the PHA will request verification from a responsible medical professional and will use this determination. If the responsible medical professional cannot provide a determination, the person generally will be considered temporarily absent. The family may present evidence that the family member is confined on a permanent basis and request that the person not be considered a family member.

Return of Permanently Absent Family Members

SFHA Policy

The family must request PHA approval for the return of any adult family members that the PHA has determined to be permanently absent. The individual is subject to the eligibility and screening requirements discussed elsewhere in this chapter.

3-I.M. LIVE-IN AIDE

Live-in aide means a person who resides with one or more elderly persons, or near-elderly persons, or persons with disabilities, and who: (1) is determined to be essential to the care and well-being of the persons, (2) is not obligated for the support of the persons, and (3) would not be living in the unit except to provide the necessary supportive services [24 CFR 5.403].

The PHA must approve a live-in aide if needed as a reasonable accommodation in accordance with 24 CFR 8, to make the program accessible to and usable by the family member with disabilities.

A live-in aide is a member of the household, not the family, and the income of the aide is not considered in income calculations [24 CFR 5.609(b)]. Relatives may be approved as live-in aides if they meet all of the criteria defining a live-in aide. However, a relative who serves as a live-in aide is not considered a family member and would not be considered a remaining member of a tenant family.

SFHA Policy

A family's request for a live-in aide must be made in writing. Written verification will be required from a reliable, knowledgeable professional, such as a doctor, social worker, or case worker, that the live-in aide is essential for the care and well-being of the elderly, near-elderly, or disabled family member. For continued approval, the family must submit a new, written request-subject to PHA verification-at each annual reexamination.

In addition, the family and live-in aide will be required to submit a certification stating that the live-in aide is (1) not obligated for the support of the person(s) needing the care, and (2) would not be living in the unit except to provide the necessary supportive services.

The PHA will not approve a particular person as a live-in aide, and may withdraw such approval if [24 CFR 982.316(b)]:

- The person commits fraud, bribery or any other corrupt or criminal act in connection with any federal housing program;

- The person commits drug-related criminal activity or violent criminal activity; or

- The person currently owes rent or other amounts to the PHA or to another PHA in connection with Housing Choice Voucher Program or Conventional Public Housing Program under the 1937 Act.

Within 30 calendar days of receiving a request for a live-in aide, including all required documentation related to the request, the PHA will notify the family of its decision in writing.

PART II: BASIC ELIGIBILITY CRITERIA

3-II.A. INCOME ELIGIBILITY AND TARGETING

Income Limits

HUD is required by law to set income limits that determine the eligibility of applicants for HUD's assisted housing programs, including the housing choice voucher program. The income limits are published annually and are based on HUD estimates of median family income in a particular area or county, with adjustments for family size.

Types of Low-Income Families [24 CFR 5.603(b)]

Low-income family. A family whose annual income does not exceed 80 percent of the median income for the area, adjusted for family size.

Very low-income family. A family whose annual income does not exceed 50 percent of the median income for the area, adjusted for family size.

Extremely low-income family. A family whose annual income does not exceed 30 percent of the median income for the area, adjusted for family size.

HUD may establish income ceilings higher or lower than 30, 50, or 80 percent of the median income for an area if HUD finds that such variations are necessary because of unusually high or low family incomes.

Using Income Limits for Eligibility [24 CFR 982.201]

Income limits are used for eligibility only at admission. Eligibility is established by comparing a family's annual income with HUD's published income limits. To be income-eligible, a family must be one of the following:

- A *very low-income* family
- A *low-income* family that has been "continuously assisted" under the 1937 Housing Act. A family is considered to be continuously assisted if the family is already receiving assistance under any 1937 Housing Act program at the time the family is admitted to the HCV program [24 CFR 982.4]

SFHA Policy

The PHA will consider a family to be continuously assisted if the family was leasing a unit under any 1937 Housing Act program at the time they were issued a voucher by the PHA.

- A low-income family that qualifies for voucher assistance as a non-purchasing household living in HOPE 1 (public housing homeownership), HOPE 2 (multifamily housing homeownership) developments, or other HUD-assisted multifamily homeownership programs covered by 24 CFR 248.173

- A low-income or moderate-income family that is displaced as a result of the prepayment of a mortgage or voluntary termination of a mortgage insurance contract on eligible low-income housing as defined in 24 CFR 248.101

HUD permits the PHA to establish additional categories of low-income families that may be determined eligible. The additional categories must be consistent with the PHA plan and the consolidated plans for local governments within the PHA's jurisdiction.

SFHA Policy

The PHA has not established any additional categories of eligible low-income families.

Using Income Limits for Targeting [24 CFR 982.201]

At least 75 percent of the families admitted to the PHA's program during a PHA fiscal year must be extremely low-income families. HUD may approve exceptions to this requirement if the PHA demonstrates that it has made all required efforts, but has been unable to attract an adequate number of qualified extremely low-income families.

Families continuously assisted under the 1937 Housing Act and families living in eligible low-income housing that are displaced as a result of prepayment of a mortgage or voluntary termination of a mortgage insurance contract are not subject to the 75 percent restriction.

3-II.B. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS [24 CFR 5, Subpart E]

Housing assistance is available only to individuals who are U.S. citizens, U.S. nationals (herein referred to as citizens and nationals), or noncitizens that have eligible immigration status. At least one family member must be a citizen, national, or noncitizen with eligible immigration status in order for the family to qualify for any level of assistance.

All applicant families must be notified of the requirement to submit evidence of their citizenship status when they apply. Where feasible, and in accordance with the PHA's Limited English Proficiency Plan, the notice must be in a language that is understood by the individual if the individual is not proficient in English.

Declaration [24 CFR 5.508]

HUD requires each family member to declare whether the individual is a citizen, a national, or an eligible noncitizen, except those members who elect not to contend that they have eligible immigration status. Those who elect not to contend their status are considered to be ineligible noncitizens. For citizens, nationals and eligible noncitizens the declaration must be signed personally by the head, spouse, co-head, and any other family member 18 or older, and by a parent or guardian for minors. The family must identify in writing any family members who elect not to contend their immigration status (see Ineligible Noncitizens below). No declaration is required for live-in aides, foster children, or foster adults.

U.S. Citizens and Nationals

In general, citizens and nationals are required to submit only a signed declaration that claims their status. However, HUD regulations permit the PHA to request additional documentation of their status, such as a passport.

SFHA Policy

Family members who declare citizenship or national status will not be required to provide additional documentation unless the PHA receives information indicating that an individual's declaration may not be accurate.

Eligible Noncitizens

In addition to providing a signed declaration, those declaring eligible noncitizen status must sign a verification consent form and cooperate with PHA efforts to verify their immigration status as described in Chapter 7. The documentation required for establishing eligible noncitizen status varies depending upon factors such as the date the person entered the U.S., the conditions under which eligible immigration status has been granted, the person's age, and the date on which the family began receiving HUD-funded assistance.

Lawful residents of the Marshall Islands, the Federated States of Micronesia, and Palau, together known as the Freely Associated States, or FAS, are eligible for housing assistance under section 141 of the Compacts of Free Association between the U.S. Government and the Governments of the FAS [Public Law 106-504].

Ineligible Noncitizens

Those noncitizens who do not wish to contend their immigration status are required to have their names listed on a non-contending family members listing, signed by the head, spouse, or co-head (regardless of citizenship status), indicating their ineligible immigration status. The PHA is not required to verify a family member's ineligible status and is not required to report an individual's unlawful presence in the U.S. to the United States Citizenship and Immigration Services (USCIS).

Providing housing assistance to noncitizen students is prohibited [24 CFR 5.522]. This prohibition extends to the noncitizen spouse of a noncitizen student as well as to minor children who accompany or follow to join the noncitizen student. Such prohibition does not extend to the citizen spouse of a noncitizen student or to the children of the citizen spouse and noncitizen student. Such a family is eligible for prorated assistance as a mixed family.

Mixed Families

A family is eligible for assistance as long as at least one member is a citizen, national, or eligible noncitizen. Families that include eligible and ineligible individuals are considered *mixed families*. Such families will be given notice that their assistance will be prorated, and that they may request a hearing if they contest this determination. See Chapter 6 for a discussion of how rents are prorated, and Chapter 16 for a discussion of informal hearing procedures.

Ineligible Families [24 CFR 5.514(d), (e), and (f)]

A PHA may elect to provide assistance to a family before the verification of the eligibility of the individual or one family member [24 CFR 5.512(b)]. Otherwise, no individual or family may be assisted prior to the affirmative establishment by the PHA that the individual or at least one family member is eligible. Verification of eligibility for this purpose occurs when the individual or family members have submitted documentation to the PHA in accordance with program requirements [24 CFR 5.512(a)].

SFHA Policy

The PHA will not provide assistance to a family before the verification of at least one family member.

When a PHA determines that an applicant family does not include any citizens, nationals, or eligible noncitizens, following the verification process, the family will be sent a written notice within 30 calendar days of the determination.

The notice will explain the reasons for the denial of assistance, that the family may be eligible for proration of assistance, and will advise the family of its right to request an appeal to the United States Citizenship and Immigration Services (USCIS), or to request an informal hearing with the PHA. The informal hearing with the PHA may be requested in lieu of the USCIS appeal, or at the conclusion of the USCIS appeal process. The notice must also inform the applicant family that assistance may not be delayed until the conclusion of the USCIS appeal process, but that it may be delayed pending the completion of the informal hearing process.

Informal hearing procedures are contained in Chapter 16.

Timeframe for Determination of Citizenship Status [24 CFR 5.508(g)]

For new occupants joining the assisted family, the PHA must verify status at the first interim or regular reexamination following the person's occupancy, whichever comes first.

If an individual qualifies for a time extension for the submission of required documents, the PHA must grant such an extension for no more than 30 days [24 CFR 5.508(h)].

Each family member is required to submit evidence of eligible status only one time during continuous occupancy.

SFHA Policy

The PHA will verify the status of applicants at the time other eligibility factors are determined.

3-II.C. SOCIAL SECURITY NUMBERS [24 CFR 5.216 and 5.218, Notice PIH 2010-3]

The applicant and all members of the applicant's household must disclose the complete and accurate social security number (SSN) assigned to each household member, and the documentation necessary to verify each SSN. A detailed discussion of acceptable documentation is provided in Chapter 7.

Note: These requirements do not apply to noncitizens who do not contend eligible immigration status.

In addition, each participant who has not previously disclosed an SSN, has previously disclosed an SSN that HUD or the SSA determined was invalid, or has been issued a new SSN must submit their complete and accurate SSN and the documentation required to verify the SSN at the time of the next interim or annual reexamination or recertification. Participants age 62 or older as of January 31, 2010, whose determination of eligibility was begun before January 31, 2010, are exempt from this requirement and remain exempt even if they move to a new assisted unit.

The PHA must deny assistance to an applicant family if they do not meet the SSN disclosure and documentation requirements contained in 24 CFR 5.216.

3-II.D. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 5.230, HCV GB, p. 5-13]

HUD requires each adult family member, and the head of household, spouse, or co-head, regardless of age, to sign form HUD-9886, Authorization for the Release of Information/Privacy Act Notice, and other consent forms as needed to collect information relevant to the family's eligibility and level of assistance. Chapter 7 provides detailed information concerning the consent forms and verification requirements.

The PHA must deny admission to the program if any member of the applicant family fails to sign and submit the consent forms for obtaining information in accordance with 24 CFR 5, Subparts B and F [24 CFR 982.552(b)(3)].

3-II.E. STUDENTS ENROLLED IN INSTITUTIONS OF HIGHER EDUCATION [24 CFR 5.612 and FR Notice 4/10/06]

Section 327 of Public Law 109-115 and the implementing regulation at 24 CFR 5.612 established new restrictions on the eligibility of certain students (both part- and full-time) who are enrolled in institutions of higher education.

If a student enrolled at an institution of higher education is under the age of 24, is not a veteran, is not married, does not have a dependent child, and is not a person with disabilities receiving HCV assistance as of November 30, 2005, the student's eligibility must be examined along with the income eligibility of the student's parents. In these cases, both the student and the student's parents must be income eligible for the student to receive HCV assistance. If, however, a student in these circumstances is determined independent from his/her parents in accordance with PHA policy, the income of the student's parents will not be considered in determining the student's eligibility.

The new law does not apply to students who reside with parents who are applying to receive HCV assistance. It is limited to students who are seeking assistance on their own, separately from their parents.

Definitions

In determining whether and how the new eligibility restrictions apply to a student, the PHA will rely on the following definitions [FR 4/10/06, p. 18148].

Dependent Child

In the context of the student eligibility restrictions, *dependent child* means a dependent child of a student enrolled in an institution of higher education. The dependent child must also meet the definition of *dependent* in 24 CFR 5.603, which states that the dependent must be a member of the assisted family, other than the head of household or spouse, who is under 18 years of age, or is a person with a disability, or is a full-time student. Foster children and foster adults are not considered dependents.

Independent Student

SFHA Policy

The PHA will consider a student "independent" from his or her parents and the parents' income will not be considered when determining the student's eligibility if the following four criteria are all met:

The individual is of legal contract age under state law.

The individual has established a household separate from his/her parents for at least one year prior to application for occupancy or the individual meets the U.S. Department of Education's definition of independent student.

To be considered an *independent student* according to the Department of Education, a student must meet one or more of the following criteria:

Be at least 24 years old by December 31 of the award year for which aid is sought

Be an orphan or a ward of the court through the age of 18

Be a veteran of the U.S. Armed Forces

Have one or more legal dependents other than a spouse (for example, dependent children or an elderly dependent parent)

Be a graduate or professional student

Be married

The individual was not claimed as a dependent by his/her parents pursuant to IRS regulations, as demonstrated on the parents' most recent tax forms.

The individual provides a certification of the amount of financial assistance that will be provided by his/her parents. This certification must be signed by the individual providing the support and must be submitted even if no assistance is being provided.

The PHA will verify that a student meets the above criteria in accordance with the policies in Section 7-II.E.

Institution of Higher Education

The PHA will use the statutory definition under section 102 of the Higher Education Act of 1965 to determine whether a student is attending an *institution of higher education* (see Exhibit 3-2).

Parents

SFHA Policy

For purposes of student eligibility restrictions, the definition of *parents* includes biological or adoptive parents, stepparents (as long as they are currently married to the biological or adoptive parent), and guardians (e.g., grandparents, aunt/uncle, godparents, etc).

Person with Disabilities

The PHA will use the statutory definition under section 3(b)(3)(E) of the 1937 Act to determine whether a student is a *person with disabilities* (see Exhibit 3-1).

Veteran

SFHA Policy

A *veteran* is a person who served in the active military, naval, or air service and who was discharged or released from such service under conditions other than dishonorable.

Determining Student Eligibility

If a student is applying for assistance on his/her own, apart from his/her parents, the PHA must determine whether the student is subject to the eligibility restrictions contained in 24 CFR 5.612. If the student is subject to those restrictions, the PHA must ensure that: (1) the student is individually eligible for the program, (2) either the student is independent from his/her parents or the student's parents are income eligible for the program, and (3) the "family" with which the student is applying is collectively eligible for the program.

SFHA Policy

For any student who is subject to the 5.612 restrictions, the PHA will:

Follow its usual policies in determining whether the student individually and the student's "family" collectively are eligible for the program

Determine whether the student is independent from his/her parents in accordance with the definition of *independent student* in this section

Follow the policies below, if applicable, in determining whether the student's parents are income eligible for the program

If the PHA determines that the student, the student's parents (if applicable), or the student's "family" is not eligible, the PHA will send a notice of denial in accordance with the policies in Section 3-III.F, and the applicant family will have the right to request an informal review in accordance with the policies in Section 16-III.B.

Determining Parental Income Eligibility

SFHA Policy

For any student who is subject to the 5.612 restrictions and who does not satisfy the definition of *independent student* in this section, the PHA will determine the income eligibility of the student's parents as follows:

If the student's parents are married and living together, the PHA will obtain a joint income declaration and certification of joint income from the parents.

If the student's parent is widowed or single, the PHA will obtain an income declaration and certification of income from that parent.

If the student's parents are divorced or separated, the PHA will obtain an income declaration and certification of income from each parent.

If the student has been living with one of his/her parents and has not had contact with or does not know where to contact his/her other parent, the PHA will require the student to submit a certification under penalty of perjury describing the circumstances and stating that the student does not receive financial assistance from the other parent. The PHA will then obtain an income declaration and certification of income from the parent with whom the student has been living or had contact.

In determining the income eligibility of the student's parents, the PHA will use

the income limits for the jurisdiction in which the parents live.

PART III: DENIAL OF ASSISTANCE

3-III.A. OVERVIEW

A family that does not meet the eligibility criteria discussed in Parts I and II, must be denied assistance.

In addition, HUD requires or permits the PHA to deny assistance based on certain types of current or past behaviors of family members as discussed in this part. The PHA's authority in this area is limited by the Violence against Women Reauthorization Act of 2005 (VAWA), which expressly prohibits the denial of admission to an otherwise qualified applicant on the basis that the applicant is or has been the victim of domestic violence, dating violence, or stalking [24 CFR 5.2005].

Forms of Denial [24 CFR 982.552(a)(2); HCV GB, p. 5-35]

Denial of assistance includes any of the following:

- Not placing the family's name on the waiting list
- Denying or withdrawing a voucher
- Not approving a request for tenancy or refusing to enter into a HAP contract
- Refusing to process a request for or to provide assistance under portability procedures

Prohibited Reasons for Denial of Program Assistance [24 CFR 982.202(b), Pub.L. 109-162]

HUD rules prohibit denial of program assistance to the program based on any of the following criteria:

- Age, disability, race, color, religion, sex, or national origin. (See Chapter 2 for additional information about fair housing and equal opportunity requirements.)
- Where a family lives prior to admission to the program
- Where the family will live with assistance under the program. Although eligibility is not affected by where the family will live, there may be restrictions on the family's ability to move outside the PHA's jurisdiction (See Chapter 10, Portability.)
- Whether members of the family are unwed parents, recipients of public assistance, or children born out of wedlock
- Whether the family includes children
- Whether a family decides to participate in a family self-sufficiency program
- Whether or not a qualified applicant has been a victim of domestic violence, dating violence, or stalking

3-III.B. REQUIRED DENIAL OF ASSISTANCE [24 CFR 982.553(a)]

HUD requires the PHA to deny assistance in the following cases:

- Any member of the household has been evicted from federally-assisted housing in the last three (3) years for drug-related criminal activity.

SFHA Policy

The PHA will admit an otherwise-eligible family who was evicted from federally-assisted housing within the past three (3) years for drug-related criminal activity, if the PHA is able to verify that the household member who engaged in the criminal activity has completed a supervised drug rehabilitation program approved by the PHA, or the person who committed the crime, is no longer living in the household.

- The PHA determines that any household member is currently engaged in the use of illegal drugs. *Drugs* means a controlled substance as defined in section 102 of the Controlled Substances Act [21 U.S.C. 802]. *Currently engaged in the illegal use of a drug* means a person has engaged in the behavior recently enough (within twelve months) to justify a reasonable belief that there is continuing illegal drug use by a household member [24 CFR 960.205(b)(1)].
- The PHA has reasonable cause to believe that any household member's current use or pattern of use of illegal drugs, or current abuse or pattern of abuse of alcohol, may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

SFHA Policy

In determining reasonable cause, the PHA will consider all credible evidence, including but not limited to, any record of convictions, arrests, or evictions of household members related to the use of illegal drugs or the abuse of alcohol. A conviction will be given more weight than an arrest. The PHA will also consider evidence from treatment providers or community-based organizations providing services to household members.

- Any household member has ever been convicted of drug-related criminal activity for the production or manufacture of methamphetamine on the premises of federally assisted housing.
- Any household member is subject to a lifetime registration requirement under a state sex offender registration program

3-III.C. OTHER PERMITTED REASONS FOR DENIAL OF ASSISTANCE

HUD permits, but does not require, the PHA to deny assistance for the reasons discussed in this section.

Criminal Activity [24 CFR 982.553]

HUD permits, but does not require, the PHA to deny assistance if the PHA determines that any household member is currently engaged in, or has engaged in during a reasonable time before the family would receive assistance, certain types of criminal activity.

SFHA Policy

If any household member is currently engaged in, or has engaged in any of the following criminal activities, within the past five years, the family will be denied assistance.

Drug-related criminal activity, defined by HUD as the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug [24 CFR 5.100].

Violent criminal activity, defined by HUD as any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage [24 CFR 5.100].

Criminal activity that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity; or

Criminal activity that may threaten the health or safety of property owners and management staff, and persons performing contract administration functions or other responsibilities on behalf of the PHA (including a PHA employee or a PHA contractor, subcontractor, or agent).

Criminal sexual conduct, including but not limited to sexual assault, incest, open and gross lewdness, or child abuse.

Evidence of such criminal activity includes, but is not limited to any record of convictions, arrests, or evictions for suspected drug-related or violent criminal activity of household members within the past 5 years. A conviction for such activity will be given more weight than an arrest or an eviction.

In making its decision to deny assistance, the PHA will consider the factors discussed in Section 3-III.E. Upon consideration of such factors, the PHA may, on a case-by-case basis, decide not to deny assistance.

Previous Behavior in Assisted Housing [24 CFR 982.552(c)]

HUD authorizes the PHA to deny assistance based on the family's previous behavior in assisted housing:

SFHA Policy

The PHA **will not** deny assistance to an otherwise eligible family because the family previously failed to meet its obligations under the Family Self-Sufficiency (FSS) program.

The PHA **will** deny assistance to an applicant family if:

The family does not provide information that the PHA or HUD determines is necessary in the administration of the program.

Any PHA has ever terminated assistance under the program for any member of the family.

The family owes rent or other amounts to any PHA in connection with the HCV, Certificate, Moderate Rehabilitation or public housing programs, unless the family repays the full amount of the debt prior to being selected from the waiting list.

If the family has not reimbursed any PHA for amounts the PHA paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease, unless the family repays the full amount of the debt prior to being selected from the waiting list.

Has a pattern of eviction from housing or termination from residential programs within the past five years (considering relevant circumstances)

Owes rent or other amounts to this or any other PHA or owner in connection with any assisted housing program, including breach of the terms of a repayment agreement entered into with the PHA, unless the family repays the full amount of the debt covered in the repayment agreement prior to being selected from the waiting list.

The family does not provide complete and true information to the PHA. Misrepresented or does not provide complete information related to eligibility, including income, award of preferences for admission, expenses, family composition or rent

Has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program

Has engaged in or threatened violent or abusive behavior toward PHA personnel

Abusive or violent behavior towards PHA personnel includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.

Threatening refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.

In making its decision to deny assistance, the PHA will consider the factors discussed in Section 3-III.E. Upon consideration of such factors, the PHA may, on a case-by-case basis, decide not to deny assistance.

3-III.D. SCREENING

Screening for Eligibility

PHAs are authorized to obtain criminal conviction records from law enforcement agencies to screen applicants for admission to the HCV program. This authority assists the PHA in complying with HUD requirements and PHA policies to deny assistance to applicants who are engaging in or have engaged in certain criminal activities. In order to obtain access to the records the PHA must require every applicant family to submit a consent form signed by each adult household member [24 CFR 5.903].

SFHA Policy

The PHA will perform criminal background checks through third party services. The PHA may use the criminal records system of the City and County of San Francisco, the State of California, the NCIC, and other states and/or municipalities as well as local law enforcement to check for criminal history for all adult household members.

If the results of the criminal background check indicate there may have been past criminal activity, but the results are inconclusive, the PHA will request a fingerprint card and will request information from the National Crime Information Center (NCIC) or the PHA may obtain the information for a similar agency.

PHAs are required to perform criminal background checks necessary to determine whether any household member is subject to a lifetime registration requirement under a state sex offender program in the state where the housing is located, as well as in any other state where a household member is known to have resided [24 CFR 982.553(a)(2)(i)].

If the PHA proposes to deny assistance based on a criminal record or on lifetime sex offender registration information, the PHA must notify the household of the proposed action and must provide the subject of the record and the applicant a copy of the record and an opportunity to dispute the accuracy and relevance of the information prior to a denial of admission. [24 CFR 5.903(f) and 5.905(d)].

Screening for Suitability as a Tenant [24 CFR 982.307]

The PHA has no liability or responsibility to the owner for the family's behavior or suitability for tenancy. The PHA may opt to conduct additional screening to determine whether an applicant is likely to be a suitable tenant.

SFHA Policy

The PHA will inform owners of their responsibility to screen prospective tenants, and will provide owners with the required known name and address information, at the time of the initial HQS inspection or before. The PHA will not provide any additional information to the owner, such as tenancy history, criminal history, etc.

The owner is responsible for screening and selection of the family to occupy the owner's unit. The PHA must inform the owner that screening and selection for tenancy is the responsibility of the owner. An owner may consider a family's history with respect to factors such as: payment of rent and utilities, caring for a unit and premises, respecting the rights of other residents to the

peaceful enjoyment of their housing, criminal activity that is a threat to the health, safety or property of others, and compliance with other essential conditions of tenancy.

HUD requires the PHA to provide prospective owners with the family's current and prior address (as shown in PHA records) and the name and address (if known) of the owner at the family's current and prior addresses' in conformity with SFHA confidentiality standards. HUD permits the PHA to provide owners with additional information, as long as families are notified that the information will be provided, and the same type of information is provided to all owners.

SFHA Policy

The PHA will not conduct additional screening to determine an applicant family's suitability for tenancy.

3-III.E. CRITERIA FOR DECIDING TO DENY ASSISTANCE

Evidence [24 CFR 982.553(c)]

SFHA Policy

The PHA will use the concept of the preponderance of the evidence as the standard for making all admission decisions.

Preponderance of the evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not. Preponderance of the evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

Consideration of Circumstances [24 CFR 982.552(c)(2)]

HUD authorizes the PHA to consider all relevant circumstances when deciding whether to deny assistance based on a family's past history except in the situations for which denial of assistance is mandated (see Section 3-III.B).

In the event the PHA receives unfavorable information with respect to an applicant, consideration must be given to the time, nature, and extent of the applicant's conduct (including the seriousness of the offense). In a manner consistent with its policies, PHAs may give consideration to factors which might indicate a reasonable probability of favorable future conduct.

SFHA Policy

The PHA will consider the following factors prior to making its decision:

The seriousness of the case, especially with respect to how it would affect other residents

The effects that denial of assistance may have on other members of the family who were not involved in the action or failure

The extent of participation or culpability of individual family members, including whether the culpable family member is a minor or a person with disabilities, or (as discussed further in section 3-III.G) a victim of domestic violence, dating violence, or stalking

The length of time since the violation occurred, the family's recent history and the likelihood of favorable conduct in the future

Evidence of the applicant family's participation in or willingness to participate in social service or other appropriate counseling service programs

In the case of drug or alcohol abuse, whether the culpable household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program or has otherwise been rehabilitated successfully

The PHA will require the applicant to submit evidence of the household member's current participation in or successful completion of a supervised

drug or alcohol rehabilitation program, or evidence of otherwise having been rehabilitated successfully.

Removal of a Family Member's Name from the Application [24 CFR 982.552(c)(2)(ii)]

HUD permits PHAs to impose as a condition of admission, a requirement that family members who participated in or were culpable for an action or failure to act which results in the denial of assistance, to not reside in the unit.

SFHA Policy

As a condition of receiving assistance, a family may agree to remove the culpable family member from the application. In such instances, the head of household must certify that the family member will not be permitted to visit or to stay as a guest in the assisted unit.

After admission to the program, the family must present evidence of the former family member's current address upon PHA request.

Reasonable Accommodation [24 CFR 982.552(c)(2)(iv)]

If the family includes a person with disabilities, the PHA's decision concerning denial of admission is subject to consideration of reasonable accommodation in accordance with 24 CFR Part 8.

SFHA Policy

If the family indicates that the behavior of a family member with a disability is the reason for the proposed denial of assistance, the PHA will determine whether the behavior is related to the disability. If so, upon the family's request, the PHA will determine whether alternative measures are appropriate as a reasonable accommodation. The PHA will only consider accommodations that can reasonably be expected to address the behavior that is the basis of the proposed denial of assistance. See Chapter 2 for a discussion of reasonable accommodation.

3-III.F. PROHIBITION AGAINST DENIAL OF ASSISTANCE TO VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, AND STALKING [24 CFR Part 5, Subpart L]

The Violence against Women Reauthorization Act of 2005 (VAWA) prohibits denial of admission to an otherwise qualified applicant on the basis that the applicant is or has been a victim of domestic violence, dating violence, or stalking. Specifically, Section 606(4)(A) of VAWA adds the following provision to Section 8 of the U.S. Housing Act of 1937, which lists contract provisions and requirements for the housing choice voucher program:

- That an applicant or participant is or has been a victim of domestic violence, dating violence, or stalking is not an appropriate reason for denial of program assistance or for denial of admission, if the applicant otherwise qualifies for assistance or admission [24 CFR 5.2005].

Definitions [24 CFR 5.2003]

As used in VAWA:

- The term *bifurcate* means, with respect to a public housing or Section 8 lease, to divide a lease as a matter of law such that certain tenants can be evicted or removed while the remaining family members' lease and occupancy rights are allowed to remain intact.
- The term *domestic violence* includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.
- The term *dating violence* means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - The length of the relationship
 - The type of relationship
 - The frequency of interaction between the persons involved in the relationship
- The term *stalking* means:
 - To follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate; or
 - To place under surveillance with the intent to kill, injure, harass, or intimidate another person; and
 - In the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to (1) that person, (2) a member of the immediate family of that person, or (3) the spouse or intimate partner of that person.
- The term *immediate family member* means, with respect to a person:

- A spouse, parent, brother or sister, or child of that person, or an individual to whom that person stands in the position or place of a parent; or
- Any other person living in the household of that person and related to that person by blood and marriage.

Notification

SFHA Policy

The PHA acknowledges that a victim of domestic violence, dating violence, or stalking may have an unfavorable history (e.g., a poor credit history, a record of previous damage to an apartment, a prior arrest record) that would warrant denial under the PHA's policies. Therefore, if the PHA makes a determination to deny admission to an applicant family, the PHA will include in its notice of denial:

A statement of the protection against denial provided by VAWA

A description of PHA confidentiality requirements

A request that an applicant wishing to claim this protection submit to the PHA documentation meeting the specifications below with her or his request for an informal review (see section 16-III.D)

Documentation

Victim Documentation

SFHA Policy

An applicant claiming that the cause of an unfavorable history is that a member of the applicant family is or has been a victim of domestic violence, dating violence, or stalking must provide documentation demonstrating the connection between the abuse and the unfavorable history. The documentation may consist of any of the following:

A statement signed by the victim certifying that the information provided is true and correct and that it describes bona fide incident(s) of actual or threatened domestic violence, dating violence, or stalking

A police or court record documenting the domestic violence, dating violence, or stalking

Documentation signed by a person who has assisted the victim in addressing domestic violence, dating violence, or stalking, or the effects of such abuse. This person may be an employee, agent, or volunteer of a victim service provider; an attorney; or a medical or other knowledgeable professional. The person signing the documentation must attest under penalty of perjury to the person's belief that the incidents in question are bona fide incidents of abuse. The victim must also sign the documentation.

Time Frame for Submitting Documentation

SFHA Policy

An individual who claims protection against adverse action based on an incident or incidents of actual or threatened domestic violence, dating violence or stalking, and who is required by the PHA, or a S8 HCV owner or manager to provide verification, must provide such verification within 14 business days (i.e., 14 calendar days, excluding Saturdays, Sundays and federally-recognized holidays) after receipt of the request for verification. Failure to provide verification, in proper form within such time will result in loss of protection under VAWA and this policy against a proposed adverse action. [42 U.S.C. section 1437f(ee)(2)(A)(2006); 42 U.S.C. section 1437 (u)(2)(A)(2006)]

The applicant must submit the required documentation with her or his request for an informal review (see section 16-III.D) or must request an extension in writing at that time. If the applicant so requests, the PHA will grant an extension of 10 business days, and will postpone scheduling the applicant's informal review until after it has received the documentation or the extension period has elapsed. If after reviewing the documentation provided by the applicant the PHA determines that the family is eligible for assistance, no informal review will be scheduled and the PHA will proceed with admission of the applicant family.

PHA Confidentiality Requirements [24 CFR 5.2007(a)(1)(v)]

All information provided to the PHA regarding domestic violence, dating violence, or stalking, including the fact that an individual is a victim of such violence or stalking, must be retained in confidence and may neither be entered into any shared database nor provided to any related entity, except to the extent that the disclosure (a) is requested or consented to by the individual in writing, (b) is required for use in an eviction proceeding, or (c) is otherwise required by applicable law.

Disclosure may be used in an eviction procedure if it is related to whether the incident or incidents in question qualify as a serious or repeated violation of the lease or criminal activity directly relating to domestic violence, or stalking; disclosure is otherwise required by law. [42 U.S. C. § 1437d(u)(2)(A)(2006)]

If disclosure is required for use in an eviction proceeding or is otherwise required by applicable law, the PHA will inform the victim before disclosure occurs so that safety risks can be identified and addressed.

3-III.G. NOTICE OF ELIGIBILITY OR DENIAL

If the family is eligible for assistance, the PHA will notify the family when it extends the invitation to attend the voucher briefing appointment, as discussed in Chapter 5.

If the PHA determines that a family is not eligible for the program for any reason, the family must be notified promptly. The notice must describe: (1) the reasons for which assistance has been denied, (2) the family's right to an informal review, and (3) the process for obtaining the informal review [24 CFR 982.554 (a)]. See Chapter 16, for informal review policies and procedures.

PHA Policy

If, based on a criminal record or sex offender registration information an applicant family appears to be ineligible, the PHA will notify the family in writing of the proposed denial and provide a copy of the record to the applicant and to the subject of the record. The family will be given 10 business days to dispute the accuracy and relevance of the information. If the family does not contact the PHA to dispute the information within that 10 day period, the PHA will proceed with issuing the notice of denial of admission. A family that does not exercise their right to dispute the accuracy of the information prior to issuance of the official denial letter will still be given the opportunity to do so as part of the informal hearing process. (See Chapter 16)

Notice requirements related to denying assistance to noncitizens are contained in Section 3-II.B.

Notice policies related to denying admission to applicants who may be victims of domestic violence, dating violence, or stalking are contained in Section 3-III.G.

EXHIBIT 3-1: DETAILED DEFINITIONS RELATED TO DISABILITIES

Person with Disabilities [24 CFR 5.403]

The term *person with disabilities* means a person who has any of the following types of conditions:

- Has a disability, as defined in 42 U.S.C. Section 423(d)(1)(A), which reads:

Inability to engage in any substantial gainful activity by reason of any medically determinable physical or mental impairment which can be expected to result in death or which has lasted or can be expected to last for a continuous period of not less than 12 months; *or*

In the case of an individual who has attained the age of 55 and is blind (within the meaning of “blindness” as defined in section 416(i)(1) of this title), inability by reason of such blindness to engage in substantial gainful activity, requiring skills or ability comparable to those of any gainful activity in which he has previously engaged with some regularity and over a substantial period of time.
- Has a developmental disability as defined in the Developmental Disabilities Assistance and Bill of Rights Act of 2000 [42 U.S.C.15002(8)], which defines developmental disability in functional terms as follows:

(A) In General

The term “developmental disability” means a severe, chronic disability of an individual that:

- (i) is attributable to a mental or physical impairment or combination of mental and physical impairments;
- (ii) is manifested before the individual attains age 22;
- (iii) is likely to continue indefinitely;
- (iv) results in substantial functional limitations in 3 or more of the following areas of major life activity: (I) Self-care, (II) Receptive and expressive language, (III) Learning, (IV) Mobility, (V) Self-direction, (VI) Capacity for independent living, (VII) Economic self-sufficiency; and
- (v) reflects the individual’s need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

(B) Infants and Young Children

An individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting 3 or more of the criteria described in clauses (i) through (v) of subparagraph (A) if the individual, without services and supports, has a high probability of meeting those criteria later in life.

- Has a physical, mental, or emotional impairment that is expected to be of long-continued and indefinite duration; substantially impedes his or her ability to live independently, and is of such a nature that the ability to live independently could be improved by more suitable housing conditions.

People with the acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for AIDS are not excluded from this definition.

A person whose disability is based solely on any drug or alcohol dependence does not qualify as a person with disabilities for the purposes of this program.

For purposes of reasonable accommodation and program accessibility for persons with disabilities, the term person with disabilities refers to an individual with handicaps.

Individual with Handicaps [24 CFR 8.3]

Individual with handicaps means any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such an impairment; or is regarded as having such an impairment. The term does not include any individual who is an alcoholic or drug abuser whose current use of alcohol or drugs prevents the individual from participating in the program or activity in question, or whose participation, by reason of such current alcohol or drug abuse, would constitute a direct threat to property or the safety of others. As used in this definition, the phrase:

(1) Physical or mental impairment includes:

- (a) Any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine; or
- (b) Any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term physical or mental impairment includes, but is not limited to, such diseases and conditions as orthopedic, visual, speech and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, drug addiction and alcoholism.

(2) *Major life activities* means functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working.

(3) Has a record of such an impairment means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities.

(4) *Is regarded as having an impairment* means:

- (a) Has a physical or mental impairment that does not substantially limit one or more major life activities but that is treated by a recipient as constituting such a limitation;
- (b) Has a physical or mental impairment that substantially limits one or more major life activities only as a result of the attitudes of others toward such impairment; or
- (c) Has none of the impairments defined in paragraph (1) of this section but is treated by a recipient as having such an impairment.

**EXHIBIT 3-2: DEFINITION OF INSTITUTION OF HIGHER EDUCATION
[20 U.S.C. 1001 and 1002]**

Eligibility of Students for Assisted Housing under 56cv 56trrer Section 8 of the U.S. Housing Act of 1937; Supplementary Guidance; Notice [Federal Register, April 10, 2006]

Institution of Higher Education shall have the meaning given this term in the Higher Education Act of 1965 in 20 U.S.C. 1001 and 1002.

Definition of “Institution of Higher Education” From 20 U.S.C. 1001

- (a) Institution of higher education. For purposes of this chapter, other than subchapter IV and part C of subchapter I of chapter 34 of Title 42, the term “institution of higher education” means an educational institution in any State that
- (1) Admits as regular students only persons having a certificate of graduation from a school providing secondary education, or the recognized equivalent of such a certificate;
 - (2) Is legally authorized within such State to provide a program of education beyond secondary education;
 - (3) Provides an educational program for which the institution awards a bachelor’s degree or provides not less than a 2-year program that is acceptable for full credit toward such a degree;
 - (4) Is a public or other nonprofit institution; and
 - (5) Is accredited by a nationally recognized accrediting agency or association, or if not so accredited, is an institution that has been granted pre-accreditation status by such an agency or association that has been recognized by the Secretary for the granting of pre-accreditation status, and the Secretary has determined that there is satisfactory assurance that the institution will meet the accreditation standards of such an agency or association within a reasonable time.
- (b) Additional institutions included. For purposes of this chapter, other than subchapter IV and part C of subchapter I of chapter 34 of Title 42, the term “institution of higher education” also includes—
- (1) Any school that provides not less than a 1-year program of training to prepare students for gainful employment in a recognized occupation and that meets the provision of paragraphs (1), (2), (4), and (5) of subsection (a) of this section; and
 - (2) A public or nonprofit private educational institution in any State that, in lieu of the requirement in subsection (a)(1) of this section, admits as regular students persons who are beyond the age of compulsory school attendance in the State in which the institution is located.
- (c) List of accrediting agencies. For purposes of this section and section 1002 of this title, the Secretary shall publish a list of nationally recognized accrediting agencies or associations that the Secretary determines, pursuant to subpart 2 of part G of subchapter IV of this chapter, to be reliable authority as to the quality of the education or training offered.

Definition of “Institution of Higher Education” From 20 U.S.C. 1002

- (a) Definition of institution of higher education for purposes of student assistance programs

- (1) Inclusion of additional institutions. Subject to paragraphs (2) through (4) of this subsection, the term “institution of higher education” for purposes of subchapter IV of this chapter and part C of subchapter I of chapter 34 of title 42 includes, in addition to the institutions covered by the definition in section 1001 of this title—
 - (A) A proprietary institution of higher education (as defined in subsection (b) of this section);
 - (B) A postsecondary vocational institution (as defined in subsection (c) of this section); and
 - (C) Only for the purposes of part B of subchapter IV of this chapter, an institution outside the United States that is comparable to an institution of higher education as defined in section 1001 of this title and that has been approved by the Secretary for the purpose of part B of subchapter IV of this chapter.
- (2) Institutions outside the United States
 - (A) In general. For the purpose of qualifying as an institution under paragraph (1)(C), the Secretary shall establish criteria by regulation for the approval of institutions outside the United States and for the determination that such institutions are comparable to an institution of higher education as defined in section 1001 of this title (except that a graduate medical school, or a veterinary school, located outside the United States shall not be required to meet the requirements of section 1001 (a)(4) of this title). Such criteria shall include a requirement that a student attending such school outside the United States is ineligible for loans made, insured, or guaranteed under part B of subchapter IV of this chapter unless—
 - (i) In the case of a graduate medical school located outside the United States—
 - (I)(aa) At least 60 percent of those enrolled in, and at least 60 percent of the graduates of, the graduate medical school outside the United States were not persons described in section 1091(a)(5) of this title in the year preceding the year for which a student is seeking a loan under part B of subchapter IV of this chapter; and
 - (bb) At least 60 percent of the individuals who were students or graduates of the graduate medical school outside the United States or Canada (both nationals of the United States and others) taking the examinations administered by the Educational Commission for Foreign Medical Graduates received a passing score in the year preceding the year for which a student is seeking a loan under part B of subchapter IV of this chapter; or
 - (II) The institution has a clinical training program that was approved by a State as of January 1, 1992; or
 - (ii) In the case of a veterinary school located outside the United States that does not meet the requirements of section 1001(a)(4) of this title, the institution’s students complete their clinical training at an approved veterinary school located in the United States.
 - (B) Advisory panel

- (i) In general. For the purpose of qualifying as an institution under paragraph (1)(C) of this subsection, the Secretary shall establish an advisory panel of medical experts that shall—
 - (I) Evaluate the standards of accreditation applied to applicant foreign medical schools; and
 - (II) Determine the comparability of those standards to standards for accreditation applied to United States medical schools.
 - (ii) Special rule if the accreditation standards described in clause (i) are determined not to be comparable, the foreign medical school shall be required to meet the requirements of section 1001 of this title.
- (C) Failure to release information. The failure of an institution outside the United States to provide, release, or authorize release to the Secretary of such information as may be required by subparagraph (A) shall render such institution ineligible for the purpose of part B of subchapter IV of this chapter.
- (D) Special rule. If, pursuant to this paragraph, an institution loses eligibility to participate in the programs under subchapter IV of this chapter and part C of subchapter I of chapter 34 of title 42, then a student enrolled at such institution may, notwithstanding such loss of eligibility, continue to be eligible to receive a loan under part B while attending such institution for the academic year succeeding the academic year in which such loss of eligibility occurred.
- (3) Limitations based on course of study or enrollment. An institution shall not be considered to meet the definition of an institution of higher education in paragraph (1) if such institution—
- (A) Offers more than 50 percent of such institution's courses by correspondence, unless the institution is an institution that meets the definition in section 2471 (4)(C) of this title;
 - (B) Enrolls 50 percent or more of the institution's students in correspondence courses, unless the institution is an institution that meets the definition in such section, except that the Secretary, at the request of such institution, may waive the applicability of this subparagraph to such institution for good cause, as determined by the Secretary in the case of an institution of higher education that provides a 2-or 4-year program of instruction (or both) for which the institution awards an associate or baccalaureate degree, respectively;
 - (C) Has a student enrollment in which more than 25 percent of the students are incarcerated, except that the Secretary may waive the limitation contained in this subparagraph for a nonprofit institution that provides a 2-or 4-year program of instruction (or both) for which the institution awards a bachelor's degree, or an associate's degree or a postsecondary diploma, respectively; or
 - (D) Has a student enrollment in which more than 50 percent of the students do not have a secondary school diploma or its recognized equivalent, and does not provide a 2-or 4-year program of instruction (or both) for which the institution awards a bachelor's degree or an associate's degree, respectively, except that the Secretary may waive the

limitation contained in this subparagraph if a nonprofit institution demonstrates to the satisfaction of the Secretary that the institution exceeds such limitation because the institution serves, through contracts with Federal, State, or local government agencies, significant numbers of students who do not have a secondary school diploma or its recognized equivalent.

(4) Limitations based on management. An institution shall not be considered to meet the definition of an institution of higher education in paragraph (1) if—

(A) The institution, or an affiliate of the institution that has the power, by contract or ownership interest, to direct or cause the direction of the management or policies of the institution, has filed for bankruptcy, except that this paragraph shall not apply to a nonprofit institution, the primary function of which is to provide health care educational services (or an affiliate of such an institution that has the power, by contract or ownership interest, to direct or cause the direction of the institution's management or policies) that files for bankruptcy under chapter 11 of title 11 between July 1, 1998, and December 1, 1998; or

(B) The institution, the institution's owner, or the institution's chief executive officer has been convicted of, or has pled nolo contendere or guilty to, a crime involving the acquisition, use, or expenditure of funds under subchapter IV of this chapter and part C of subchapter I of chapter 34 of title 42, or has been judicially determined to have committed fraud involving funds under subchapter IV of this chapter and part C of subchapter I of chapter 34 of title 42.

(5) Certification. The Secretary shall certify an institution's qualification as an institution of higher education in accordance with the requirements of subpart 3 of part G of subchapter IV of this chapter.

(6) Loss of eligibility. An institution of higher education shall not be considered to meet the definition of an institution of higher education in paragraph (1) if such institution is removed from eligibility for funds under subchapter IV of this chapter and part C of subchapter I of chapter 34 of title 42 as a result of an action pursuant to part G of subchapter IV of this chapter.

(b) Proprietary institution of higher education

(1) Principal criteria. For the purpose of this section, the term "proprietary institution of higher education" means a school that—

(A) Provides an eligible program of training to prepare students for gainful employment in a recognized occupation;

(B) Meets the requirements of paragraphs (1) and (2) of section 1001 (a) of this title;

(C) Does not meet the requirement of paragraph (4) of section 1001 (a) of this title;

(D) Is accredited by a nationally recognized accrediting agency or association recognized by the Secretary pursuant to part G of subchapter IV of this chapter;

(E) Has been in existence for at least 2 years; and

(F) Has at least 10 percent of the school's revenues from sources that are not derived from funds provided under subchapter IV of this chapter and part C of subchapter I of

chapter 34 of title 42, as determined in accordance with regulations prescribed by the Secretary.

- (2) Additional institutions. The term “proprietary institution of higher education” also includes a proprietary educational institution in any State that, in lieu of the requirement in paragraph (1) of section 1001 (a) of this title, admits as regular students persons who are beyond the age of compulsory school attendance in the State in which the institution is located.
- (c) Postsecondary vocational institution.
- (1) Principal criteria. For the purpose of this section, the term “postsecondary vocational institution” means a school that—
 - (A) Provides an eligible program of training to prepare students for gainful employment in a recognized occupation;
 - (B) Meets the requirements of paragraphs (1), (2), (4), and (5) of section 1001 (a) of this title; and
 - (C) Has been in existence for at least 2 years.
 - (2) Additional institutions. The term “postsecondary vocational institution” also includes an educational institution in any State that, in lieu of the requirement in paragraph (1) of section 1001 (a) of this title, admits as regular students persons who are beyond the age of compulsory school attendance in the State in which the institution is located.

Chapter 4

APPLICATIONS, WAITING LIST AND TENANT SELECTION

INTRODUCTION

When a family wishes to receive Section 8 HCV assistance, the family must submit an application that provides the PHA with the information needed to determine the family's eligibility. HUD requires the PHA to place all families that apply for assistance on a waiting list. When HCV assistance becomes available, the PHA must select families from the waiting list in accordance with HUD requirements and PHA policies as stated in the administrative plan and the annual plan.

The PHA is required to adopt a clear approach to accepting applications, placing families on the waiting list, selecting families from the waiting list and must follow this approach consistently. The actual order in which families are selected from the waiting list can be affected if a family has certain characteristics designated by HUD or the PHA to receive preferential treatment. Funding earmarked exclusively for families with particular characteristics may also alter the order in which families are served.

HUD regulations require that all families have an equal opportunity to apply for and receive housing assistance, and that the PHA affirmatively further fair housing goals in the administration of the program [24 CFR 982.53, HCV GB p. 4-1]. Adherence to the selection policies described in this chapter ensures that the PHA will be in compliance with all relevant fair housing requirements, as described in Chapter 2.

This chapter describes HUD and PHA policies for taking applications, managing the waiting list and selecting families for HCV assistance. The policies outlined in this chapter are organized into three sections, as follows:

Part I: The Application Process. This part provides an overview of the application process, and discusses how applicants can obtain and submit applications. It also specifies how the PHA will handle the applications it receives.

Part II: Managing the Waiting List. This part presents the policies that govern how the PHA's waiting list is structured, when it is opened and closed, and how the public is notified of the opportunity to apply for assistance. It also discusses the process the PHA will use to keep the waiting list current.

Part III: Selection for HCV Assistance. This part describes the policies that guide the PHA in selecting families for HCV assistance as such assistance becomes available. It also specifies how in-person interviews will be used to ensure that the PHA has the information needed to make a final eligibility determination.

PART I: THE APPLICATION PROCESS

4-I.A. OVERVIEW

This part describes the policies that guide the PHA's efforts to distribute and accept applications, and to make preliminary determinations of applicant family eligibility that affect placement of the family on the waiting list. This part also describes the PHA's obligation to ensure the accessibility of the application process to elderly persons, people with disabilities, and people with limited English proficiency (LEP).

4-I.B. APPLYING FOR ASSISTANCE [HCV GB, pp. 4-11 – 4-16, Notice PIH 2009-36]

Any family that wishes to receive HCV assistance must apply for admission to the program. HUD permits the PHA to determine the format and content of HCV applications, as well how such applications will be made available to interested families and how applications will be accepted by the PHA. However, the PHA must include Form HUD-92006, Supplement to Application for Federally Assisted Housing, as part of the PHA's application.

SFHA Policy

At the time of the application, the family must provide all of the information necessary to establish family eligibility and level of assistance.

The PHA will use the following process to update applicants on their status as they reach the top of the waiting list. The family will be required to provide all of the information necessary to establish family eligibility and level of assistance when the family is selected from the waiting list.

Families may obtain application forms from the PHA's office during normal business hours. Families may also request – by telephone or by mail – that a form be sent to the family via first class mail.

Completed applications must be returned to the PHA by mail, by fax, or submitted in person during normal business hours. Applications must be complete in order to be accepted by the PHA for processing. If an application is incomplete, the PHA will notify the family of the additional information required.

4-I.C. ACCESSIBILITY OF THE APPLICATION PROCESS

Elderly and Disabled Populations [24 CFR 8 and HCV GB, pp. 4-11 – 4-13]

The PHA must take a variety of steps to ensure that the application process is accessible to those people who might have difficulty complying with the normal, standard PHA application process. This could include people with disabilities, certain elderly individuals, as well as persons with limited English proficiency (LEP). The PHA must provide reasonable accommodation to the needs of individuals with disabilities. The application-taking facility and the application process must be fully accessible, or the PHA must provide an alternate approach that provides full access to the application process. Chapter 2 provides a full discussion of the PHA's policies related to providing reasonable accommodations for people with disabilities.

Limited English Proficiency

PHAs are required to take reasonable steps to ensure meaningful access to their programs and activities by persons with limited English proficiency [24 CFR 1]. Chapter 2 provides a full discussion on the PHA's policies related to ensuring access to people with limited English proficiency (LEP).

4-I.D. PLACEMENT ON THE WAITING LIST

The PHA must review each complete application received and make a preliminary assessment of the family's eligibility. The PHA must accept applications from families for whom the list is open unless there is good cause for not accepting the application (such as denial of assistance) for the grounds stated in the regulations [24 CFR 982.206(b)(2)]. Where the family is determined to be ineligible, the PHA must notify the family in writing [24 CFR 982.201(f)]. Where the family is not determined to be ineligible, the family will be placed on a waiting list of applicants.

No applicant has a right or entitlement to be listed on the waiting list, or to any particular position on the waiting list [24 CFR 982.202(c)].

Ineligible for Placement on the Waiting List

SFHA Policy

If the PHA can determine from the information provided that a family is ineligible, the family will not be placed on the waiting list. Where a family is determined to be ineligible, the PHA will send written notification of the ineligibility determination within 30 calendar days of receiving a complete application. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal review and explain the process for doing so (see Chapter 16).

Eligible for Placement on the Waiting List

SFHA Policy

The PHA will send written notification of the preliminary eligibility determination within 30 calendar days of receiving a complete application.

Placement on the waiting list does not indicate that the family is, in fact, eligible for assistance. A final determination of eligibility will be made when the family is selected from the waiting list.

Applicants will be placed on the waiting list according to any preference(s) for which they qualify, and the date and time their complete application is received by the PHA.

PART II: MANAGING THE WAITING LIST

4-II.A. OVERVIEW

The PHA must have policies regarding various aspects of organizing and managing the waiting list of applicant families. This includes opening the list to new applicants, closing the list to new applicants, notifying the public of waiting list openings and closings, updating waiting list information, purging the list of families that are no longer interested in or eligible for assistance, as well as conducting outreach to ensure a sufficient number of applicants.

In addition, HUD imposes requirements on how a PHA may structure its waiting list and how families must be treated if they apply for assistance from a PHA that administers more than one assisted housing program.

4-II.B. ORGANIZATION OF THE WAITING LIST [24 CFR 982.204 and 205]

The PHA's HCV waiting list must be organized in such a manner to allow the PHA to accurately identify and select families for assistance in the proper order, according to the admissions policies described in this plan.

The waiting list must contain the following information for each applicant listed:

- Applicant name;
- Family unit size;
- Date and time of application;
- Qualification for any local preference;
- Racial or ethnic designation of the head of household.

HUD requires the PHA to maintain a single waiting list for the HCV program unless it serves more than one county or municipality. Such PHAs are permitted, but not required, to maintain a separate waiting list for each county or municipality served.

SFHA Policy

The PHA will maintain a single waiting list for the HCV program, ~~including the Project-Based Voucher Program.~~

Site Based Waiting List

The San Francisco Housing Authority has implemented site-based waiting lists for the following locations:

[Bayinihan House, Citizens Housing Corporation, SOMA/Family Apts., Dalt Hotel, L.P.

Dalt Hotel, Dudley Apartments, Folsom/Dore Apt. (Citizen Housing), Tenderloin

Neighborhood Development Corporation (TNDC),

421 Leavenworth St./Sierra Madre Apts.; 481-85 Eddy Street/Cameo Apts.;

480 Eddy Street/Yosemite Apts.; West Hotel, 141-145 Eddy Street;
Curran House, 145 Taylor Street; 460 Ellis Street/Kimm Apts.;
250-60 McAllister Street/Plaza Ramon Apts.

HUD directs that a family that applies for assistance from the HCV program must be offered the opportunity to be placed on the waiting list for any public housing, project-based voucher or moderate rehabilitation program the PHA operates if 1) the other programs' waiting lists are open, and 2) the family is qualified for the other programs.

HUD permits, but does not require, that PHAs maintain a single merged waiting list for their public housing, Section 8, and other subsidized housing programs.

A family's decision to apply for, receive, or refuse other housing assistance must not affect the family's placement on the HCV waiting list, or any preferences for which the family may qualify.

SFHA Policy

The PHA will not merge the HCV waiting list with the waiting list for any other program the PHA operates.

4-II.C. OPENING AND CLOSING THE WAITING LIST [24 CFR 982.206]

Closing the Waiting List

A PHA is permitted to close the waiting list if it has an adequate pool of families to use its available HCV assistance. Alternatively, the PHA may elect to continue to accept applications only from certain categories of families that meet particular preferences or funding criteria.

SFHA Policy

The PHA will close the waiting list when the estimated waiting period for housing assistance for applicants on the list reaches 120 months for the most current applicants. Where the PHA has particular preferences or funding criteria that require a specific category of family, the PHA may elect to continue to accept applications from these applicants while closing the waiting list to others.

Reopening the Waiting List

If the waiting list has been closed, it cannot be reopened until the PHA publishes a notice in local newspapers of general circulation, minority media, and other suitable media outlets. The notice must comply with HUD fair housing requirements and must specify who may apply, and where and when applications will be received. The notice must provide the criteria defining what families may apply.

SFHA Policy

The PHA will announce the reopening of the waiting list at least 10 business days prior to the date applications will first be accepted. If the list is only being reopened for certain categories of families, this information will be contained in the notice.

The PHA will give public notice by publishing the relevant information in suitable media outlets including, but not limited to:

- The San Francisco Chronicle
- Minority-owned and foreign language newspapers
- Posting in the lobby of the PHA office at 1815 Egbert Ave, San Francisco, CA
- Posting in the lobby of the PHA Leased Housing Division office
- Radio and television stations in order to inform the visually impaired
- Notices circulated for posting at social service agencies, community centers and the Bay Area public housing agencies

4-II.D. FAMILY OUTREACH [HCV GB, pp. 4-2 to 4-4]

The PHA must conduct outreach as necessary to ensure that the PHA has a sufficient number of applicants on the waiting list to use the HCV resources it has been allotted.

Because HUD requires the PHA to serve a specified percentage of extremely low income families (see Chapter 4, Part III), the PHA may need to conduct special outreach to ensure that an adequate number of such families apply for assistance [HCV GB, p. 4-20 to 4-21].

PHA outreach efforts must comply with fair housing requirements. This includes:

- Analyzing the housing market area and the populations currently being served to identify underserved populations
- Ensuring that outreach efforts are targeted to media outlets that reach eligible populations that are underrepresented in the program
- Avoiding outreach efforts that prefer or exclude people who are members of a protected class

PHA outreach efforts must be designed to inform qualified families about the availability of assistance under the program. These efforts may include, as needed, any of the following activities:

- Submitting press releases to local newspapers, including minority newspapers
- Developing informational materials and flyers to distribute to other agencies
- Providing application forms to other public and private agencies that serve the low income population
- Developing partnerships with other organizations that serve similar populations, including agencies that provide services for persons with disabilities

SFHA Policy

The PHA will monitor the characteristics of the population being served and the characteristics of the population as a whole in the PHA's jurisdiction. Targeted outreach efforts will be undertaken if a comparison suggests that certain populations are being underserved.

4-II.E. REPORTING CHANGES IN FAMILY CIRCUMSTANCES

SFHA Policy

While the family is on the waiting list, the family must immediately inform the PHA within 10 business days, of changes in family size or composition, preference status, or contact information, including current residence, mailing address, and phone number. The changes must be submitted in writing.

4-II.F. UPDATING THE WAITING LIST [24 CFR 982.204]

HUD requires the PHA to establish policies to use when removing applicant names from the waiting list.

Purging the Waiting List

The decision to withdraw an applicant family that includes a person with disabilities from the waiting list is subject to reasonable accommodation. If the applicant did not respond to a PHA request for information or updates because of the family member's disability, the PHA must reinstate the applicant family to their former position on the waiting list [24 CFR 982.204(c)(2)].

SFHA Policy

The waiting list will be updated as needed to ensure that all applicants and applicant information is current and timely.

To update the waiting list, the PHA will send an update request via first class mail to each family on the waiting list to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the last address that the PHA has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list.

The family's response must be in writing and may be delivered in person, by mail, or by fax. Responses should be postmarked or received by the PHA not later than 15 business days from the date of the PHA letter.

If the family fails to respond within 15 business days, the family will be removed from the waiting list without further notice.

If the notice is returned by the post office with no forwarding address, the applicant will be removed from the waiting list without further notice.

If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 15 business days to respond from the date the letter was re-sent. If the family fails to respond within this time frame, the family will be removed from the waiting list without further notice.

The family may request to be reinstated to the waitlist within one year of the withdraw date. The family may request an informal review resulting from removal of the waitlist.

Removal from the Waiting List

SFHA Policy

If at any time an applicant family is on the waiting list, the PHA determines that the family is not eligible for assistance (see Chapter 3), the family will be removed from the waiting list.

If a family is removed from the waiting list because the PHA has determined the family is not eligible for assistance, a notice will be sent to the family's address of record as well as to any alternate address provided on the initial application. The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal review regarding the PHA's decision (see Chapter 16) [24 CFR 982.201(f)].

PART III: SELECTION FOR HCV ASSISTANCE

4-III.A. OVERVIEW

As vouchers become available, families on the waiting list must be selected for assistance in accordance with the policies described in this part.

The order in which families receive assistance from the waiting list depends on the selection method chosen by the PHA and is impacted in part by any selection preferences that the family qualifies for. The source of HCV funding also may affect the order in which families are selected from the waiting list.

The PHA must maintain a clear record of all information required to verify that the family is selected from the waiting list according to the PHA's selection policies [24 CFR 982.204(b) and 982.207(e)].

4-III.B. SELECTION AND HCV FUNDING SOURCES

Special Admissions [24 CFR 982.203]

HUD may award funding for specifically-named families living in specified types of units (e.g., a family that is displaced by demolition of public housing; a non-purchasing family residing in a HOPE 1 or 2 projects). In these cases, the PHA may admit families that are not on the waiting list, or without considering the family's position on the waiting list. The PHA must maintain records showing that such families were admitted with special program funding.

Regular HCV Funding

Regular HCV funding may be used to assist any eligible family on the waiting list. Families are selected from the waiting list according to the policies provided in Section 4-III.C.

4-III.C. SELECTION METHOD

PHAs must describe the method for selecting applicant families from the waiting list, including the system of admission preferences that the PHA will use [24 CFR 982.202(d)].

Local Preferences [24 CFR 982.207; HCV p. 4-16]

PHAs are permitted to establish local preferences, and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources.

SFHA Policy

The SFHA adopted the following local preferences during the Annual Plan Process in 2012. All preferences must be verified at the time of intake. If an applicant is unable to provide verification at the time of intake, the applicant will be placed back on the waitlist according to the date and time of application.

- **Absolute Preference(s)**
 - Veteran /Surviving Spouse of Veteran
 - San Francisco District Attorney Referrals
 - Public Housing residents who have been approved for an emergency transfer
- **Involuntary Displacement from residence in San Francisco (5 points)**
- **Homeless Family in San Francisco (5 points)**
- **Homeless Senior or Person with Disability in San Francisco (5 points)**
- **Homeless Adult in San Francisco (3 points)**
- **Substandard Non-Homeless in San Francisco (2 points)**
- **Resident in San Francisco Paying more than 70% of household income in rent (1 point)**

Absolute Preference(s)

Veteran/Surviving Spouse of Veteran

California Health and Safety Code section 34322.2(b) states that “[p]riority shall be given with each preference category to families of veterans and servicemen.” A veteran is someone who is recognized by a local, state or federal government agency as a veteran, and he or she receives or qualifies for veteran’s benefits. Therefore, veterans and families of veterans shall receive preference within each of SFHA’s preference categories.

San Francisco District Attorney Referrals (Witness Relocation Preference)

Notwithstanding all preferences indicated below, participants in the Witness Relocation and Protection (WRAP) Program will have an absolute Preference on the wait list and be considered for a Housing Choice Voucher ahead of all other applicants on the wait list.

The SFHA in cooperation with the San Francisco District Attorney's Office (—DAI) and the San Francisco Police Department (—SFPDI) has established an absolute preference on its Housing Choice Voucher Wait List to assist witnesses of violent crimes who are being assisted by the Witness Relocation and Assistance Program (—WRAP) in exchange for testimony leading to the conviction of the violent criminal(s) arrested in connection with the witnessed crime.

The absolute Preference will enable a family on the Housing Choice Voucher Wait List who participates in WRAP to rise to the top of the waitlist and be eligible for immediate assistance. Strict guidelines must be met to ensure continued assistance for WRAP participants. In order for WRAP families to be eligible for assistance, the following conditions must be met:

1. The witness MUST testify in all trials held for the alleged crime. Eligibility for the WRAP must be initiated by the SFDA's Office who must present credible evidence, of the danger or of retaliatory violence to the family, to the SFHA;
2. All family members MUST NOT violate any conditions or responsibilities of the WRAP;
3. All household members MUST agree to move out of the City and County of San Francisco;
4. The Relocating family must be in good standing with the SFHA and not owe any balance for rent or unpaid tenant damages;
5. All family members MUST NOT return to the City and County of San Francisco while assisted under the Voucher Program as a participant of the WRAP unless required by the SFDA's office or the SFPD;
6. The family MUST cooperate with all requirements of the Section 8 Program and the —receiving housing authority's policies and procedures; and
7. If the family reveals the location of its new unit or their status in the California WRAP, the Voucher, at the discretion of the initial or the receiving Public Housing Agency (—PHA) may be forfeited. Circumstances will be reviewed on a case by case basis.

If the household is absorbed by the receiving PHA, the voucher will be released for use by another family on the Housing Choice Voucher wait list. The SFHA will administer any Voucher that is not absorbed by the receiving PHA to the extent funding permits.

Public Housing Residents Who Have Been Approved for an Emergency Transfer

The SFHA will provide a maximum of ten (10) vouchers per fiscal year for Public Housing Residents who have been approved for an emergency transfer. The resident family must be on the Housing Choice Voucher Waitlist to qualify for this preference. The family must show that there is good cause reason to deny any or all Public Housing unit(s) that have been offered prior

to qualifying for the Housing Choice Voucher. Good cause for refusal of a unit offer under this preference includes demonstration by the family that accepting previously offered unit(s) would place a family or family member's life, health or safety in immediate jeopardy. Reasons must be specific to the family. Compelling documentation such as court orders or restraining orders will be requested. Refusals due to the location of the unit alone are not considered "good cause." The final decision as to whether the family receives a voucher under this preference will be made by the Executive Director or his/her designee.

Preferences

The following preferences are mutually exclusive. An applicant family is limited to selecting one of the following:

Involuntary Displacement (5 points)

An applicant is or will be involuntarily displaced if the applicant has vacated or will have to vacate his or her housing unit as a result of one or more of the following actions:

- *Natural Disaster*: A disaster such as a fire, flood or earthquake that resulted in the inhabitability of the applicant's unit.
- *Domestic Violence*: An applicant who has vacated due to actual or threatened physical violence directed against the applicant or one or more members of the applicant's family by a spouse or other household member, who lives in housing with an individual who engages in such violence.
- *Victim of Hate Crime/Violent Crime*: Actual or threatened physical violence or intimidation directed against an applicant and his/her property that is based on the person's race, color, creed, religion, national origin, ancestry, age, height, weight, sex, sexual orientation, gender identity, domestic partner status, marital status, disability or Acquired Immune Deficiency Syndrome or HIV status (AIDS/HIV status), or association with members of such protected classes, that is documented by law enforcement agency stating that the applicant is in an immediate life-threatening situation and that an immediate transfer would minimize the problem.
- *Government Action*: an action of a government agency related to code enforcement or public improvement or development.
- *Landlord Action*: an action by a housing owner that results in an applicant's having to vacate his or her unit, where the reason for the owner's action was beyond the applicant's ability to control or prevent, and despite the applicant having met all previously imposed conditions of occupancy, and the action is other than a rent increase.

Homeless Families in San Francisco (5 points)

An applicant family qualifies for this preference when the family:

- Lacks a fixed regular, and adequate nighttime residence; and/or
- Has a primary residence that is:

- A supervised publicly or privately operated shelter or transitional housing residence designed to provide temporary living accommodations; or
- An institution that provides a residence for an individual; or
- A public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
- Families with minor children in a Single Room Occupancy (SRO) unit.

Homeless Seniors or Persons with Disability (5 points)

An applicant senior or person with disability qualifies for this preference when the applicant:

- Lacks a fixed regular, and adequate nighttime residence; and/or
- Has a primary residence that is:
 - A supervised publicly or privately operated shelter or transitional housing residence designed to provide temporary living accommodations; or
 - An institution that provides a residence for an individual; or
 - A public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
 - Not accessible

Homeless Adult in San Francisco (3 points)

An applicant homeless adult qualifies for this preference when the applicant:

- Lacks a fixed regular, and adequate nighttime residence; and/or
- Has a primary residence that is:
 - A supervised publicly or privately operated shelter or transitional housing residence designed to provide temporary living accommodations; or
 - An institution that provides a temporary residence for an individual; or
 - A public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;

Substandard Non-Homeless in San Francisco

An applicant who is a “Non-Homeless: A non-homeless applicant is living in substandard housing if their present unit meets any of the following criteria: it is "dilapidated;" it does not have operable indoor plumbing; it does not have a usable flush toilet and a usable bathtub or shower inside the unit for the exclusive use of the family; it does not have electricity, or has inadequate or unsafe electrical service; it does not have a safe or adequate source of heat; it should, but does not have a kitchen, or it has been declared unfit for habitation by a government agency. A housing unit is "dilapidated" if it does not provide safe and adequate shelter, and in its present condition endangers the health, safety, or well-being of a family or it has one or more critical defects or a combination of intermediate defects in sufficient number or extent to require considerable repair or rebuilding. The defects may have resulted from the original construction, or from continued neglect or lack of repair, or from serious damage to the structure. For purposes of this section, Single Room Occupancy (SRO) units

are not automatically considered substandard due to the lack of a kitchen and/or bathroom. SROs do not generally have these features and are thus considered standard housing unless in dilapidated physical condition.

Paying More than 70% of Income for Housing

An applicant shall qualify for this local preference if the family is paying more than 70 percent of the total family income for rent. However, an applicant may not qualify for a preference under this section if the applicant is paying more than 70 percent of family income to rent a unit because his or her housing assistance under the public housing, Housing Choice Voucher program, or any program under the Housing and Urban Development Act of 1965 with respect to that unit has been terminated as a result of the applicant's refusal to comply with applicable program policies and procedures with respect to the occupancy of under-occupied and overcrowded units.

Prohibition of Preference if Applicant was evicted for drug-related and/or criminal activity

The SFHA will not give any preference to an applicant if any member of the family is a person who was evicted within the three years prior to applying because of drug-related criminal activity from any assisted housing program. The SFHA may consider granting a preference in any of the following cases:

- If the SFHA determines that the evicted person has successfully completed a rehabilitation program approved by the SFHA; or
- If the SFHA determines that the evicted person clearly did not participate in or knew about the drug related criminal activity; or
- If the SFHA determines that the evicted person no longer participates in any drug-related criminal activity

Income Targeting Requirement [24 CFR 982.201(b)(2)]

HUD requires that extremely low-income (ELI) families make up at least 75% of the families admitted to the HCV program during the PHA's fiscal year. ELI families are those with annual incomes at or below 30% of the area median income. To ensure this requirement is met, a PHA may skip non-ELI families on the waiting list in order to select an ELI family.

Low income families admitted to the program that are "continuously assisted" under the 1937 Housing Act [24 CFR 982.4(b)], as well as low-income or moderate-income families admitted to the program that are displaced as a result of the prepayment of the mortgage or voluntary termination of an insurance contract on eligible low-income housing, are not counted for income targeting purposes [24 CFR 982.201(b)(2)(v)].

SFHA Policy

The PHA will monitor progress in meeting the ELI requirement throughout the fiscal year. Extremely low-income families will be selected ahead of other eligible families on an as-needed basis to ensure the income targeting requirement is met.

Order of Selection

The PHA system of preferences may select families either according to the date and time of application, or by a random selection process [24 CFR 982.207(c)]. When selecting families from the waiting list PHAs are required to use targeted funding to assist only those families who meet the specified criteria, and PHAs are not permitted to skip down the waiting list to a family that it can afford to subsidize when there are not sufficient funds to subsidize the family at the top of the waiting list [24 CFR 982.204(d) and (e)].

Families will be selected from the waiting list based on the targeted funding or selection preference(s) for which they qualify, and in accordance with the PHA's hierarchy of preferences, if applicable. Within each targeted funding or preference category, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the PHA. Documentation will be maintained by the PHA as to whether families on the list qualify for and are interested in targeted funding. If a higher placed family on the waiting list is not qualified or not interested in targeted funding, there will be a notation maintained so that the PHA does not have to ask higher placed families each time targeted selections are made.

4-III.D. NOTIFICATION OF SELECTION

When a family has been selected from the waiting list, the PHA must notify the family.

SFHA Policy

The PHA will notify the family by first class mail when it is selected from the waiting list. The notice will inform the family of the following:

- Date, time, and location of the scheduled application interview, including any procedures for rescheduling the interview

- Who is required to attend the interview

- Documents that must be provided at the interview to document the legal identity of household members, including information about what constitutes acceptable documentation

- Other documents and information that should be brought to the interview

If a notification letter is returned to the PHA with no forwarding address, the family will be removed from the waiting list. A notice of denial (see Chapter 3) will be sent to the family's address of record, as well as to any known alternate address.

The family may request to be reinstated to the waitlist within one year of the withdraw date. The family may request an informal review resulting from the removal of the waitlist.

4-III.E. THE APPLICATION INTERVIEW

HUD recommends that the PHA obtain the information and documentation needed to make an eligibility determination through a private interview [HCV GB, pg. 4-16]. Being invited to attend an interview does not constitute admission to the program.

Assistance cannot be provided to the family until all SSN documentation requirements are met. However, if the PHA determines that an applicant family is otherwise eligible to participate in the program, the family may retain its place on the waiting list for a period of time determined by the PHA [Notice PIH 2012-10]

Reasonable accommodation must be made for persons with disabilities who are unable to attend an interview due to their disability.

SFHA Policy

Families selected from the waiting list are required to participate in an eligibility interview.

The head of household and the spouse/co-head shall attend the interview together. However, either the head of household or the spouse/co-head may attend the interview on behalf of the family. Verification of information pertaining to adult members will not begin until all release forms are submitted to the PHA.

The interview will be conducted only if the head of household or spouse/co-head provides appropriate documentation of legal identity. (Chapter 7 provides a discussion of

proper documentation of legal identity). If the family representative does not provide the required documentation, the appointment may be rescheduled when the proper documents have been obtained.

Pending disclosure and documentation of social security numbers, the PHA will allow the family to retain its place on the waiting list for 90 days. If not all household members have disclosed their SSNs at the next time the PHA is issuing vouchers, the PHA will issue a voucher to the next eligible applicant family on the waiting list.

The family must provide the information necessary to establish the family's eligibility and determine the appropriate level of assistance, as well as completing required forms, providing required signatures, and submitting required documentation. If any materials are missing, the PHA will provide the family with a written list of items that must be submitted.

Any required documents or information that the family is unable to provide at the interview must be provided within 10 business days of the interview (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of Social Security numbers and eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (See Chapter 3).

An advocate, interpreter, or other assistant may assist the family with the application and the interview process.

Interviews will be conducted in English. For limited English proficient (LEP) applicants, the PHA will provide translation services in accordance with the PHA's LEP plan.

If the family is unable to attend a scheduled interview, the family should contact the PHA in advance of the interview to schedule a new appointment. In all circumstances, if a family does not attend a scheduled interview, the PHA will send another notification letter with a new interview appointment time. Applicants who fail to attend two scheduled interviews without PHA approval will be denied assistance based on the family's failure to supply information needed to determine eligibility. A notice of denial will be issued in accordance with policies contained in Chapter 3.

4-III.F. COMPLETING THE APPLICATION PROCESS

The PHA must verify all information provided by the family (see Chapter 7). Based on verified information, the PHA must make a final determination of eligibility (see Chapter 3) and must confirm that the family qualified for any special admission, targeted admission, or selection preference that affected the order in which the family was selected from the waiting list.

SFHA Policy

If the PHA determines that the family is ineligible, the PHA will send written notification of the ineligibility determination within 10 business days of the determination. The notice will specify the reasons for ineligibility, and will inform the family of its right to request an informal review (Chapter 16).

If a family fails to qualify for any criteria that affected the order in which it was selected from the waiting list (e.g. targeted funding, extremely low-income), the family will be returned to its original position on the waiting list ('original' for purposes of the waiting list is defined as the place the participant would have been had s/he not had any preferences or advantages at the time of eligibility determination). The PHA will notify the family in writing that it has been returned to the waiting list, and will specify the reasons for it.

If the PHA determines that the family is eligible to receive assistance, the PHA will invite the family to attend a briefing in accordance with the policies in Chapter 5.

Chapter 5

BRIEFINGS AND VOUCHER ISSUANCE

INTRODUCTION

This chapter explains the briefing and voucher issuance process. When a family is determined to be eligible for the Housing Choice Voucher (HCV) program, the PHA must ensure that the family fully understands the way the program operates and the family's obligations under the program. This is accomplished through both an oral briefing and provision of a briefing packet containing written documentation of information the family needs to know. Once the family is fully informed of the program's requirements, the PHA issues the family a voucher. The voucher includes the unit size the family qualifies for based on the PHA's subsidy standards, as well as the dates of issuance and expiration of the voucher. The voucher is the document that permits the family to begin its search for a unit, and limits the amount of time the family has to successfully locate an acceptable unit.

This chapter describes HUD regulations and PHA policies related to these topics in two parts:

Part I: Briefings and Family Obligations. This part details the program's requirements for briefing families orally, and for providing written materials describing the program and its requirements. It includes a particular focus on the family's obligations under the program.

Part II: Subsidy Standards and Voucher Issuance. This part discusses the PHA's standards for determining how many bedrooms a family of a given composition qualifies for, which in turn affects the amount of subsidy the family can receive. It also discusses the policies that dictate how vouchers are issued, and how long families have to locate a unit.

PART I: BRIEFINGS AND FAMILY OBLIGATIONS

5-I.A. OVERVIEW

HUD regulations require the PHA to conduct mandatory briefings for applicant families. The briefing provides a broad description of owner and family responsibilities, explains the PHA's procedures, and includes instructions on how to lease a unit. This part describes how oral briefings will be conducted, specifies what written information will be provided to families, and lists the family's obligations under the program.

5-I.B. BRIEFING [24 CFR 982.301]

The PHA must give the family an oral briefing and provide the family with a briefing packet containing written information about the program. Families may be briefed individually or in groups. At the briefing, the PHA must ensure effective communication in accordance with Section 504 requirements (Section 504 of the Rehabilitation Act of 1973), and ensure that the briefing site is accessible to individuals with disabilities. For a more thorough discussion of accessibility requirements, refer to Chapter 2.

SFHA Policy

Briefings will be conducted in group meetings.

Generally, the head of household is required to attend the briefing. If the head of household is unable to attend, the PHA may approve another adult family member to attend the briefing.

Families that attend group briefings and still need individual assistance will be referred to an appropriate PHA staff person.

Briefings will be conducted in English. For limited English proficient (LEP) applicants, the PHA will provide translation services in accordance with the PHA's LEP plan (See Chapter 2).

Notification and Attendance

SFHA Policy

Families will be notified of their eligibility for assistance at the time they are invited to attend a briefing. The notice will identify who is required to attend the briefing, as well as the date and time of the scheduled briefing.

If the notice is returned by the post office with no forwarding address, the applicant will be denied and their name will not be placed back on the waiting list. If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated.

Applicants who fail to attend a scheduled briefing will automatically be scheduled for another briefing. The PHA will notify the family of the date and time of the second scheduled briefing. Applicants who fail to attend two scheduled briefings, without PHA approval, will be denied assistance (see Chapter 3).

Oral Briefing [24 CFR 982.301(a)]

Each briefing must provide information on the following subjects:

- How the Housing Choice Voucher program works;
- Family and owner responsibilities;
- Where the family can lease a unit, including renting a unit inside or outside the PHA's jurisdiction;
- For families eligible under portability, an explanation of portability. The PHA cannot discourage eligible families from moving under portability;
- For families living in high-poverty census tracts, an explanation of the advantages of moving to areas outside of high-poverty concentrations; and
- For families receiving welfare-to-work vouchers, a description of any local obligations of a welfare-to-work family and an explanation that failure to meet the obligations is grounds for denial of admission or termination of assistance.

SFHA Policy

When PHA-owned units are available for lease, the PHA will inform the family during the oral briefing that the family has the right to select any eligible unit available for lease, and is not obligated to choose a PHA-owned unit.

Briefing Packet [24 CFR 982.301(b)]

Documents and information provided in the briefing packet must include the following:

- The term of the voucher, and the PHA's policies on any extensions or suspensions of the term. If the PHA allows extensions, the packet must explain how the family can request an extension.
- A description of the method used to calculate the housing assistance payment for a family, including how the PHA determines the payment standard for a family, how the PHA determines total tenant payment for a family, and information on the payment standard and utility allowance schedule.
- An explanation of how the PHA determines the maximum allowable rent for an assisted unit.
- Where the family may lease a unit. For a family that qualifies to lease a unit outside the PHA jurisdiction under portability procedures, the information must include an explanation of how portability works.
- The HUD-required tenancy addendum, which must be included in the lease.
- The form the family must use to request approval of tenancy, and a description of the procedure for requesting approval for a tenancy.
- A statement of the PHA policy on providing information about families to prospective owners.
- The PHA subsidy standards including when and how exceptions are made.
- The HUD brochure on how to select a unit.
- The HUD pamphlet on lead-based paint entitled *Protect Your Family from Lead in Your Home*.
- Information on federal, state and local equal opportunity laws and a copy of the housing discrimination complaint form.
- A list of landlords or other parties willing to lease to assisted families or help families find units, especially outside areas of poverty or minority concentration.
- Notice that if the family includes a person with disabilities, the family may request a list of available accessible units known to the PHA.
- The family obligations under the program, including any obligations of a welfare-to-work family.
- The grounds on which the PHA may terminate assistance for a participant family because of family action or failure to act.
- PHA informal hearing procedures including when the PHA is required to offer a participant family the opportunity for an informal hearing, and how to request the hearing.

If the PHA is located in a metropolitan FMR area, the following additional information must be included in the briefing packet in order to receive full points under SEMAP Indicator 7, Expanding Housing Opportunities [24 CFR 985.3(g)]:

- Maps showing areas with housing opportunities outside areas of poverty or minority concentration, both within its jurisdiction and its neighboring jurisdiction
- Information about the characteristics of these areas including job opportunities, schools, transportation, and other services
- An explanation of how portability works, including a list of portability contact persons for neighboring PHAs with names, addresses, and telephone numbers

SFHA Policy

The PHA will provide the following briefing packet:

- Fair Market Rates (FMR) for City and County of San Francisco
- Utility Allowances Schedule
- Record of Family's Search for Housing
- Beyond Normal Wear & Tear List
- Brochure: 'Protect Your Family from Lead in Your Home'
- 17 Facts You Should Know About Section 8
- Portability Information (Contact Information, Instructions, Request Form)
- Steps to Using Your Section 8 Voucher
- Tips on How to Find a Section 8 Unit
- Basic Version (sample) of Section 8 Rental Contract
- Housing Discrimination Complaint Form
- SFHA Informal Hearing Procedure
- Brochure: 'A Good Place to Live'
- Supplemental Materials

Family Self- Sufficiency Brochure

Emergency Funds for Housing

Available Housing Listings

Expanding Housing Opportunities Information

Request for Tenancy Approval (w/ original stamp)

In addition to items required by the regulations, PHAs may wish to include supplemental materials to help explain the program to both participants and owners [HCV GB p. 8-7, Notice PIH 2010-19].

5-I.C. FAMILY OBLIGATIONS

Obligations of the family are described in the housing choice voucher (HCV) regulations and on the voucher itself. These obligations include responsibilities the family is required to fulfill, as well as prohibited actions. The PHA must inform families of these obligations during the oral briefing, and the same information must be included in the briefing packet. When the family's unit is approved and the HAP contract is executed, the family must meet those obligations in order to continue participating in the program. Violation of any family obligation may result in termination of assistance, as described in Chapter 12.

Time Frames for Reporting Changes Required By Family Obligations

SFHA Policy

Unless otherwise noted below, when family obligations require the family to respond to a request or notify the PHA of a change, notifying the PHA of the request or change within 10 business days is considered prompt notice.

When a family is required to provide notice to the PHA, the notice must be in writing.

Family Obligations [24 CFR 982.551]

Following is a listing of a participant family's obligations under the HCV program:

- The family must supply any information that the PHA or HUD determines to be necessary, including submission of required evidence of citizenship or eligible immigration status.
- The family must supply any information requested by the PHA or HUD for use in a regularly scheduled reexamination or interim reexamination of family income and composition.
- The family must disclose and verify social security numbers and sign and submit consent forms for obtaining information.
- Any information supplied by the family must be true and complete.
- The family is responsible for any Housing Quality Standards (HQS) breach by the family caused by failure to pay tenant-provided utilities or appliances, or damages to the dwelling unit or premises beyond normal wear and tear caused by any member of the household or guest.

SFHA Policy

Damages beyond normal wear and tear will be considered to be damages which could be assessed against the security deposit.

- The family must allow the PHA to inspect the unit at reasonable times and after reasonable notice, as described in Chapter 8 of this plan.
- The family must not commit any serious or repeated violation of the lease.

SFHA Policy

The PHA will determine if a family has committed serious or repeated violations of the lease based on available evidence, including but not limited to, a court-ordered eviction, or an owner's notice to evict.

Serious and repeated lease violations will include, but not be limited to, nonpayment of rent, disturbance of neighbors, destruction of property, or living or housekeeping habits that cause damage to the unit or premises and criminal activity. Generally, the criteria to be used is whether the reason for the eviction was through no fault of the tenant or guests.

- The family must notify the PHA and the owner before moving out of the unit or terminating the lease.

SFHA Policy

The family must comply with lease requirements regarding written notice to the owner. The family must provide written notice to the PHA at the same time the owner is notified.

- The family must promptly give the PHA a copy of any owner eviction notice.
- The family must use the assisted unit for residence by the family. The unit must be the family's only residence.
- The composition of the assisted family residing in the unit must be approved by the PHA. The family must promptly notify the PHA in writing of the birth, adoption, or court-awarded custody of a child. The family must request PHA approval to add any other family member as an occupant of the unit.

SFHA Policy

The request to add a family member must be submitted in writing and approved prior to the person moving into the unit. The PHA will determine eligibility of the new member in accordance with the policies in Chapter 3.

- The family must promptly notify the PHA in writing if any family member no longer lives in the unit.
- If the PHA has given approval, a foster child or a live-in aide may reside in the unit. The PHA has the discretion to adopt reasonable policies concerning residency by a foster child or a live-in aide, and to define when PHA consent may be given or denied. For policies related to the request and approval/disapproval of foster children, foster adults, and live-in aides, see Chapter 3 (Sections I.K and I.M), and Chapter 11 (Section II.B).
- The family must not sublease the unit, assign the lease, or transfer the unit.

SFHA Policy

Subleasing includes receiving payment to cover rent and utility costs by a person living in the unit who is not listed as a family member.

- The family must supply any information requested by the PHA to verify that the family is living in the unit or information related to family absence from the unit.
- The family must promptly notify the PHA when the family is absent from the unit.

SFHA Policy

Notice is required under this provision only when all family members will be absent from the unit for an extended period. An extended period is defined as any period greater than 30 calendar days. Written notice must be provided to the PHA at the start of the extended absence.

- The family must pay utility bills and provide and maintain any appliances that the owner is not required to provide under the lease [Form HUD-52646, Voucher].
- The family must not own or have any interest in the unit, (other than in a cooperative and owners of a manufactured home leasing a manufactured home space).
- Family members must not commit fraud, bribery, or any other corrupt or criminal act in connection with the program. (See Chapter 14, Program Integrity for additional information).
- Family members must not engage in drug-related criminal activity or violent criminal activity or other criminal activity that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises. See Chapter 12 for HUD and PHA policies related to drug-related and violent criminal activity.
- Members of the household must not engage in abuse of alcohol in a way that threatens the health, safety or right to peaceful enjoyment of the other residents and persons residing in the immediate vicinity of the premises. See Chapter 12 for a discussion of HUD and PHA policies related to alcohol abuse.
- An assisted family or member of the family must not receive HCV program assistance while receiving another housing subsidy, for the same unit or a different unit under any other federal, state or local housing assistance program.
- A family must not receive HCV program assistance while residing in a unit owned by a parent, child, grandparent, grandchild, sister or brother of any member of the family, unless the PHA has determined (and has notified the owner and the family of such determination) that approving rental of the unit, notwithstanding such relationship, would provide reasonable accommodation for a family member who is a person with disabilities. [Form HUD-52646, Voucher]

PART II: SUBSIDY STANDARDS AND VOUCHER ISSUANCE

5-II.A. OVERVIEW

The PHA must establish subsidy standards that determine the number of bedrooms needed for families of different sizes and compositions. This part presents the policies that will be used to determine the family unit size (also known as the voucher size) a particular family should receive, and the policies that govern making exceptions to those standards. The PHA also must establish policies related to the issuance of the voucher, to the voucher term, and to any extensions or suspensions of that term.

5-II.B. DETERMINING FAMILY UNIT (VOUCHER) SIZE [24 CFR 982.402]

For each family, the PHA determines the appropriate number of bedrooms under the PHA subsidy standards and enters the family unit size on the voucher that is issued to the family. The family unit size does not dictate the size of unit the family must actually lease, nor does it determine who within a household will share a bedroom/sleeping room.

The following requirements apply when the PHA determines family unit size:

- The subsidy standards must provide for the smallest number of bedrooms needed to house a family without overcrowding.
- The subsidy standards must be consistent with space requirements under the housing quality standards.
- The subsidy standards must be applied consistently for all families of like size and composition.
- A child who is temporarily away from the home because of placement in foster care is considered a member of the family in determining the family unit size.
- A family that consists of a pregnant woman (with no other persons) must be treated as a two-person family.
- Any live-in aide (approved by the PHA to reside in the unit to care for a family member who is disabled or is at least 50 years of age) must be counted in determining the family unit size;
- Unless a live-in-aide resides with a family, the family unit size for any family consisting of a single person must be either a zero- or one-bedroom unit, as determined under the PHA subsidy standards.

SFHA Policy

The PHA will assign one bedroom for each two persons within the household, except in the following circumstances:

Live-in aides may be allocated a separate bedroom (depending on the above subsidy standard).

Single person families will be issued a studio voucher. However, should the family locate a one-bedroom unit, the SFHA reserves the right to upgrade to the family's voucher to a one-bedroom subsidy.

Foster children will be included in determining unit size.

The PHA will reference the following chart in determining the appropriate voucher size for a family:

Voucher Size	Persons in Household (Minimum – Maximum)
Studio	1-1
1 Bedroom	1-4
2 Bedrooms	2-6
3 Bedrooms	3-8
4 Bedrooms	4-10
5 Bedrooms	5-12

5-II.C. EXCEPTIONS TO SUBSIDY STANDARDS

In determining family unit size for a particular family, the PHA may grant an exception to its established subsidy standards if the PHA determines that the exception is justified by the age, sex, health, handicap, or relationship of family members or other personal circumstances [24 CFR 982.402(b)(8)]. Reasons may include, but are not limited to:

- A need for an additional bedroom for medical equipment
- A need for a separate bedroom for reasons related to a family member's disability, medical or health condition

For a single person who is not elderly, disabled, or a remaining family member, an exception cannot override the regulatory limit of a zero or one bedroom [24 CFR 982.402(b)(8)].

SFHA Policy

The PHA will consider granting an exception for any of the reasons specified in the regulation: the age, sex, health, handicap, or relationship of family members or other personal circumstances.

The family must request any exception to the subsidy standards in writing. The request must explain the need or justification for a larger family unit size, and must include appropriate documentation. Requests based on health-related reasons must be verified by a knowledgeable professional source (e.g., doctor or health professional), unless the disability and the disability-related request for accommodation is readily apparent or otherwise known. The family's continued need for an additional bedroom due to special medical equipment must be re-verified at annual reexamination.

The PHA will notify the family of its determination within 30 calendar days of receiving the family's request. If a participant family's request is denied, the notice will inform the family of their right to request an informal hearing.

5-II.D. VOUCHER ISSUANCE [24 CFR 982.302]

When a family is selected from the waiting list (or as a special admission as described in Chapter 4), or when a participant family wants to move to another unit, the PHA issues a Housing Choice Voucher, form HUD-52646. This chapter deals only with voucher issuance for applicants. For voucher issuance associated with moves of program participants, please refer to Chapter 10.

The voucher is the family's authorization to search for housing. It specifies the unit size for which the family qualifies, and includes both the date of voucher issuance and date of expiration. It contains a brief description of how the program works and explains the family obligations under the program. The voucher is evidence that the PHA has determined the family to be eligible for the program, and that the PHA expects to have money available to subsidize the family if the family finds an approvable unit. However, the PHA does not have any liability to any party by the issuance of the voucher, and the voucher does not give the family any right to participate in the PHA's housing choice voucher program [Voucher, form HUD-52646]

A voucher can be issued to an applicant family only after the PHA has determined that the family is eligible for the program based on information received within the 60 days prior to issuance [24 CFR 982.201(e)] and after the family has attended an oral briefing [HCV 8-1].

SFHA Policy

Vouchers will be issued to eligible applicants immediately following the mandatory briefing.

The PHA should have sufficient funds to house an applicant before issuing a voucher. If funds are insufficient to house the family at the top of the waiting list, the PHA must wait until it has adequate funds before it calls another family from the list [HCV GB p. 8-10].

SFHA Policy

Prior to issuing any vouchers, the PHA will determine whether it has sufficient funding in accordance with the policies in Part VIII of Chapter 16.

If the PHA determines that there is insufficient funding after a voucher has been issued, the PHA may rescind the voucher and place the affected family back on the waiting list.

5-II.E. VOUCHER TERM, EXTENSIONS, AND SUSPENSIONS

Voucher Term [24 CFR 982.303]

The initial term of a voucher must be at least 60 calendar days. The initial term must be stated on the voucher [24 CFR 982.303(a)].

SFHA Policy

The initial voucher term will be 60 calendar days.

The family must submit a Request for Tenancy Approval and proposed lease within the 60-day period unless the PHA grants an extension.

Extensions of Voucher Term [24 CFR 982.303(b)]

The PHA has the authority to grant extensions of search time, to specify the length of an extension, and to determine the circumstances under which extensions will be granted. There is

no limit on the number of extensions that the PHA can approve. Discretionary policies related to extension and expiration of search time must be described in the PHA's administrative plan [24 CFR 982.54].

PHAs must approve additional search time if needed as a reasonable accommodation to make the program accessible to and usable by a person with disabilities. The extension period must be reasonable for the purpose.

The family must be notified in writing of the PHA's decision to approve or deny an extension. The PHA's decision to deny a request for an extension of the voucher term is not subject to informal review [24 CFR 982.554(c)(4)].

SFHA Policy

The PHA may grant one or more extensions upon written request from the family, but the initial term plus any PHA- approved extension may never exceed 180 calendar days from the initial date of issuance. Written requests for extensions must be received by the PHA prior to the expiration date of the voucher. A statement of the family's efforts to locate a unit must accompany the request.

The PHA will approve additional extensions beyond the 180- day limit, only in the following circumstances:

It is necessary as a reasonable accommodation for a person with disabilities.

It is necessary due to reasons beyond the family's control, as determined by the PHA. Following is a list of extenuating circumstances that the PHA may consider in making its decision. The presence of these circumstances does not guarantee that an extension will be granted:

Serious illness or death in the family

Other family emergency

Obstacles due to employment

Whether the family has already submitted requests for tenancy approval that were not approved by the PHA

Whether family size or other special requirements make finding a unit difficult

Any request for an additional extension must include the reason(s) an additional extension is necessary. The PHA may require the family to provide documentation to support the request.

All requests for extensions to the voucher term must be made in writing and submitted to the PHA prior to the expiration date of the voucher (or extended term of the voucher).

The PHA will decide whether to approve or deny an extension request within 30 calendar days of the date the request is received, and will immediately provide the family written notice of its decision.

Suspensions of Voucher Term [24 CFR 982.303(c)]

The SFHA will suspend the term of the voucher upon the receipt of the Request for Tenancy Approval (RTA). The term will remain suspended while the unit is being processed by the SFHA. A unit can be withdrawn from consideration by the SFHA (by determining the unit or owner is ineligible or the rent requested by the owner is not approvable), by the owner or by the voucher holder. If a decision is made to withdraw the unit, the SFHA will provide the voucher holder with a written notice of this fact, the reason for the withdrawal and the number of days remaining on the term of the voucher (this tolling period can be overridden at the discretion of the supervisor or director if there is a situation where additional time is not warranted). The SFHA will provide the voucher holder with a new RTA and other appropriate forms. Under no circumstances will the total search time increase under the term of the voucher due to tolling.

Expiration of Voucher Term

Once a family's housing choice voucher term (including any extensions) expires, the family is no longer eligible to search for housing under the program. If the family still wishes to receive assistance, the PHA may require that the family reapply, or may place the family on the waiting list with a new application date but without requiring reapplication. Such a family does not become ineligible for the program on the grounds that it was unable to locate a unit before the voucher expired [HCV GB p. 8-13].

SFHA Policy

If an applicant family's voucher term or extension expires before the family has submitted a Request for Tenancy Approval (RTA), the PHA will require the family to reapply for assistance. If an RTA that was submitted prior to the expiration date of the voucher is subsequently disapproved by the PHA (after the voucher term has expired), the family will be required to reapply for assistance.

Within 30 calendar days after the expiration of the voucher term or any extension, the PHA will notify the family in writing that the voucher term has expired and that the family must reapply in order to be placed on the waiting list.

Chapter 6

INCOME AND SUBSIDY DETERMINATIONS

[24 CFR Part 5, Subparts E and F; 24 CFR 982]

INTRODUCTION

A family's income determines eligibility for assistance and is also used to calculate the family's payment and the PHA's subsidy. The PHA will use the policies and methods described in this chapter to ensure that only eligible families receive assistance and that no family pays more or less than its obligation under the regulations. This chapter describes HUD regulations and PHA policies related to these topics in three parts as follows:

- Part I: Annual Income. HUD regulations specify the sources of income to include and exclude to arrive at a family's annual income. These requirements and PHA policies for calculating annual income are found in Part I.
- Part II: Adjusted Income. Once annual income has been established HUD regulations require the PHA to subtract from annual income any of five mandatory deductions for which a family qualifies. These requirements and PHA policies for calculating adjusted income are found in Part II.
- Part III: Calculating Family Share and PHA Subsidy. This part describes the statutory formula for calculating total tenant payment (TTP), the use of utility allowances, and the methodology for determining PHA subsidy and required family payment.

PART I
ANNUAL INCOME

6-I.A. OVERVIEW

The general regulatory definition of *annual income* shown below is from 24 CFR 5.609.

5.609 Annual income.

(a) Annual income means all amounts, monetary or not, which:

- (1) Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or
- (2) Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
- (3) Which are not specifically excluded in paragraph [5.609(c)].
- (4) Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

In addition to this general definition, HUD regulations establish policies for treating specific types of income and assets. The full texts of those portions of the regulations are provided in exhibits at the end of this chapter as follows:

- Annual Income Inclusions (Exhibit 6-1)
- Annual Income Exclusions (Exhibit 6-2)
- Treatment of Family Assets (Exhibit 6-3)
- Earned Income Disallowance for Persons with Disabilities (Exhibit 6-4)
- The Effect of Welfare Benefit Reduction (Exhibit 6-5)

Sections 6-I.B and 6-I.C discuss general requirements and methods for calculating annual income. The rest of this section describes how each source of income is treated for the purposes of determining annual income. HUD regulations present income inclusions and exclusions separately [24 CFR 5.609(b) and 24 CFR 5.609(c)]. In this plan, however, the discussions of income inclusions and exclusions are integrated by topic (e.g., all policies affecting earned income are discussed together in section 6-I.D). Verification requirements for annual income are discussed in Chapter 7.

6-I.B. HOUSEHOLD COMPOSITION AND INCOME

Income received by all family members must be counted unless specifically excluded by the regulations. It is the responsibility of the head of household to report changes in family composition. The rules on which sources of income are counted vary somewhat by family member. The chart below summarizes how family composition affects income determinations.

Summary of Income Included and Excluded by Person	
Live-in aides	Income from all sources is excluded [24 CFR 5.609(c)(5)].
Foster child or foster adult	Income from all sources is excluded [24 CFR 5.609(c)(2)].
Head, spouse, or co head Other adult family members	All sources of income not specifically excluded by the regulations are included.
Children under 18 years of age	Employment income is excluded [24 CFR 5.609(c)(1)]. All other sources of income, except those specifically excluded by the regulations, are included.
Full-time students 18 years of age or older (not head, spouse, or co head)	Employment income above \$480/year is excluded [24 CFR 5.609(c)(11)]. All other sources of income, except those specifically excluded by the regulations, are included.

Temporarily Absent Family Members

The income of family members approved to live in the unit will be counted, even if the family member is temporarily absent from the unit [HCV GB, p. 5-18].

PHA Policy

Generally an individual who is or is expected to be absent from the assisted unit for 180 consecutive days or less is considered temporarily absent and continues to be considered a family member. Generally an individual who is or is expected to be absent from the assisted unit for more than 180 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.

Absent Students

PHA Policy

When someone who has been considered a family member attends school away from home, the person will continue to be considered a family member unless information becomes available to the PHA indicating that the student has established a separate household or the family declares that the student has established a separate household.

Absences Due to Placement in Foster Care

Children temporarily absent from the home as a result of placement in foster care are considered

members of the family [24 CFR 5.403].

PHA Policy

If a child has been placed in foster care, the PHA will verify with the appropriate agency whether and when the child is expected to be returned to the home. Unless the agency confirms that the child has been permanently removed from the home, the child will be counted as a family member.

Absent Head, Spouse, or Co head

PHA Policy

An employed head, spouse, or co head absent from the unit more than 180 consecutive days due to employment will continue to be considered a family member.

Family Members Permanently Confined for Medical Reasons

If a family member is confined to a nursing home or hospital on a permanent basis, that person is no longer considered a family member and the income of that person is not counted [HCV GB, p. 5-22].

PHA Policy

The PHA will request verification from a responsible medical professional and will use this determination. If the responsible medical professional cannot provide a determination, the person generally will be considered temporarily absent. The family may present evidence that the family member is confined on a permanent basis and request that the person not be considered a family member.

When an individual who has been counted as a family member is determined permanently absent, the family is eligible for the medical expense deduction only if the remaining head, spouse, or co head qualifies as an elderly person or a person with disabilities.

Joint Custody of Dependents

PHA Policy

Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family 50 percent or more of the time.

When more than one applicant or participant family is claiming the same dependents as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim the dependents. If there is a dispute about which family should claim them, the PHA will make the determination based on available documents such as court orders, or an IRS return showing which family has claimed the child for income tax purposes.

Caretakers for a Child

PHA Policy

If neither a parent nor a designated guardian remains in a household receiving HCV assistance, the PHA will take the following actions.

- (1) If a responsible agency has determined that another adult is to be brought into the assisted unit to care for a child for an indefinite period, the designated caretaker will not be considered a family member until a determination of custody or legal guardianship is made.
- (2) If a caretaker has assumed responsibility for a child without the involvement of a responsible agency or formal assignment of custody or legal guardianship, the caretaker will be treated as a visitor for 90 days. After the 90 days has elapsed, the caretaker will be considered a family member unless information is provided that would confirm that the caretaker's role is temporary. In such cases the PHA will extend the caretaker's status as an eligible visitor.
- (3) At any time that custody or guardianship legally has been awarded to a caretaker, the housing choice voucher will be transferred to the caretaker.
- (4) During any period that a caretaker is considered a visitor, the income of the caretaker is not counted in annual income and the caretaker does not qualify the family for any deductions from income.

6-I.C. ANTICIPATING ANNUAL INCOME

The PHA is required to count all income "anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date" [24 CFR 5.609(a)(2)]. Policies related to anticipating annual income are provided below.

Basis of Annual Income Projection

The PHA generally will use current circumstances to determine anticipated income for the coming 12-month period. HUD authorizes the PHA to use other than current circumstances to anticipate income when:

- An imminent change in circumstances is expected [HCV GB, p. 5-17]
- It is not feasible to anticipate a level of income over a 12-month period (e.g., seasonal or cyclic income) [24 CFR 5.609(d)]
- The PHA believes that past income is the best available indicator of expected future income [24 CFR 5.609(d)]

PHAs are required to use HUD's Enterprise Income Verification (EIV) system in its entirety as a third party source to verify employment and income information, and to reduce administrative subsidy payment errors in accordance with HUD administrative guidance [24 CFR 5.233(a)(2)].

HUD allows PHAs to use pay-stubs to project income once EIV data has been received in such cases where the family does not dispute the EIV employer data and where the PHA does not determine it is necessary to obtain additional third-party data.

PHA Policy

When EIV is obtained and the family does not dispute the EIV employer data, the PHA will use current tenant-provided documents to project annual income. When the tenant-provided documents are pay stubs, the PHA will make every effort to obtain current and consecutive pay stubs dated within the last 60 days.

The PHA will obtain written and/or oral third-party verification in accordance with the verification requirements and policy in Chapter 7 in the following cases:

If EIV or other UIV data is not available,

If the family disputes the accuracy of the EIV employer data, and/or

If the PHA determines additional information is needed.

In such cases, the PHA will review and analyze current data to anticipate annual income. In all cases, the family file will be documented with a clear record of the reason for the decision, and a clear audit trail will be left as to how the PHA annualized projected income.

Known Changes in Income

If the PHA verifies an upcoming increase or decrease in income, annual income will be calculated by applying each income amount to the appropriate part of the 12-month period.

Example: An employer reports that a full-time employee who has been receiving \$8/hour will begin to receive \$8.25/hour in the eighth week after the effective date of the reexamination. In such a case the PHA would calculate annual income as follows: $(\$8/\text{hour} \times 40 \text{ hours} \times 7 \text{ weeks}) + (\$8.25 \times 40 \text{ hours} \times 45 \text{ weeks})$.

The family may present information that demonstrates that implementing a change before its effective date would create a hardship for the family. In such cases the PHA will calculate annual income using current circumstances and then require an interim reexamination when the change actually occurs. This requirement will be imposed even if the PHA's policy on reexaminations does not require interim reexaminations for other types of changes.

When tenant-provided third-party documents are used to anticipate annual income, they will be dated within the last 60 days of the reexamination interview date.

EIV quarterly wages will not be used to project annual income at an annual or interim reexamination.

Projecting Income

In HUD's EIV webcast of January 2008, HUD made clear that PHAs are not to use EIV quarterly wages to project annual income.

6-I.D. EARNED INCOME

Types of Earned Income Included in Annual Income

Wages and Related Compensation

The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services is included in annual income [24 CFR 5.609(b)(1)].

PHA Policy

For persons who regularly receive bonuses or commissions, the PHA will verify and then

average amounts received for the two years preceding admission or reexamination. If only a one-year history is available, the PHA will use the prior year amounts. In either case the family may provide, and the PHA will consider, a credible justification for not using this history to anticipate future bonuses or commissions. If a new employee has not yet received any bonuses or commissions, the PHA will count only the amount estimated by the employer. The file will be documented appropriately.

Some Types of Military Pay

All regular pay, special pay and allowances of a member of the Armed Forces are counted [24 CFR 5.609(b)(8)] except for the special pay to a family member serving in the Armed Forces who is exposed to hostile fire [24 CFR 5.609(c)(7)].

Types of Earned Income Not Counted in Annual Income

Temporary, Nonrecurring, or Sporadic Income [24 CFR 5.609(c)(9)]

This type of income (including gifts) is not included in annual income. Sporadic income includes temporary payments from the U.S. Census Bureau for employment lasting no longer than 180 days [Notice PIH 2009-19].

PHA Policy

Sporadic income is income that is not received periodically and cannot be reliably predicted. For example, the income of an individual who works occasionally as a handyman would be considered sporadic if future work could not be anticipated and no historic, stable pattern of income existed.

Children's Earnings

Employment income earned by children (including foster children) under the age of 18 years is not included in annual income [24 CFR 5.609(c)(1)]. (See Eligibility chapter for a definition of *foster children*.)

Certain Earned Income of Full-Time Students

Earnings in excess of \$480 for each full-time student 18 years old or older (except for the head, spouse, or co head) are not counted [24 CFR 5.609(c)(11)]. To be considered "full-time," a student must be considered "full-time" by an educational institution with a degree or certificate program [HCV GB, p. 5-29].

Income of a Live-in Aide

Income earned by a live-in aide, as defined in [24 CFR 5.403], is not included in annual income [24 CFR 5.609(c)(5)]. (See Eligibility chapter for a full discussion of live-in aides.)

Income Earned under Certain Federal Programs

Income from some federal programs is specifically excluded from consideration as income [24 CFR 5.609(c) (17)], including:

- Payments to volunteers under the Domestic Volunteer Services Act of 1973 (42 U.S.C. 5044(g), 5058)
- Payments received under programs funded in whole or in part under the Job Training Partnership Act (29 U.S.C. 1552(b))

- Awards under the federal work-study program (20 U.S.C. 1087 uu)
- Payments received from programs funded under Title V of the Older Americans Act of 1985 (42 U.S.C. 3056(f))
- Allowances, earnings, and payments to AmeriCorps participants under the National and Community Service Act of 1990 (42 U.S.C. 12637(d))
- Allowances, earnings, and payments to participants in programs funded under the Workforce Investment Act of 1998 (29 U.S.C. 2931)

Resident Service Stipend

Amounts received under a resident service stipend are not included in annual income. A resident service stipend is a modest amount (not to exceed \$200 per individual per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time [24 CFR 5.600(c)(8)(iv)].

State and Local Employment Training Programs

Incremental earnings and benefits to any family member resulting from participation in qualifying state or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff are excluded from annual income. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the training program [24 CFR 5.609(c)(8)(v)].

PHA Policy

The PHA defines *training program* as “a learning process with goals and objectives, generally having a variety of components, and taking place in a series of sessions over a period to time. It is designed to lead to a higher level of proficiency, and it enhances the individual's ability to obtain employment. It may have performance standards to measure proficiency. Training may include, but is not limited to: (1) classroom training in a specific occupational skill, (2) on-the-job training with wages subsidized by the program, or (3) basic education” [expired Notice PIH 98-2, p. 3].

The PHA defines *incremental earnings and benefits* as the difference between: (1) the total amount of welfare assistance and earnings of a family member prior to enrollment in a training program, and (2) the total amount of welfare assistance and earnings of the family member after enrollment in the program [expired Notice PIH 98-2, pp. 3–4].

In calculating the incremental difference, the PHA will use as the pre-enrollment income the total annualized amount of the family member's welfare assistance and earnings reported on the family's most recently completed HUD-50058.

End of participation in a training program must be reported in accordance with the PHA's interim reporting requirements.

HUD-Funded Training Programs

Amounts received under training programs funded in whole or in part by HUD [24 CFR 5.609(c)(8)(i)] are excluded from annual income. Eligible sources of funding for the training include operating subsidy, Section 8 administrative fees, and modernization, Community Development Block Grant (CDBG), HOME program, and other grant funds received from HUD.

PHA Policy

To qualify as a training program, the program must meet the definition of *training program* provided above for state and local employment training programs.

Earned Income Tax Credit

Earned income tax credit (EITC) refund payments received on or after January 1, 1991 (26 U.S.C. 32(j)), are excluded from annual income [24 CFR 5.609(c)(17)]. Although many families receive the EITC annually when they file taxes, an EITC can also be received throughout the year. The prorated share of the annual EITC is included in the employee's payroll check.

Earned Income Disallowance

The earned income disallowance for persons with disabilities is discussed in section 6-I.E below.

6-I.E. EARNED INCOME DISALLOWANCE FOR PERSONS WITH DISABILITIES [24 CFR 5.617]

The earned income disallowance (EID) encourages people with disabilities to enter the work force by not including the full value of increases in earned income for a period of time. The full text of 24 CFR 5.617 is included as Exhibit 6-4 at the end of this chapter. Eligibility criteria and limitations on the disallowance are summarized below.

Eligibility

This disallowance applies only to individuals in families already participating in the HCV program (not at initial examination). To qualify, the family must experience an increase in annual income that is the result of one of the following events:

- Employment of a family member who is a person with disabilities and who was previously unemployed for one or more years prior to employment. *Previously unemployed* includes a person who annually has earned not more than the minimum wage applicable to the community multiplied by 500 hours. The applicable minimum wage is the federal minimum wage unless there is a higher state or local minimum wage.
- Increased earnings by a family member who is a person with disabilities and whose earnings increase during participation in an economic self-sufficiency or job-training program. A self-sufficiency program includes a program designed to encourage, assist, train, or facilitate the economic independence of HUD-assisted families or to provide work to such families [24 CFR 5.603(b)].
- New employment or increased earnings by a family member who is a person with disabilities and who has received benefits or services under Temporary Assistance for Needy Families (TANF) or any other state program funded under Part A of Title IV of the Social Security Act within the past six months. If the benefits are received in the form of monthly maintenance, there is no minimum amount. If the benefits or services are received in a form

other than monthly maintenance, such as one-time payments, wage subsidies, or transportation assistance, the total amount received over the six-month period must be at least \$500.

Calculation of the Disallowance

Calculation of the earned income disallowance for an eligible member of a qualified family begins with a comparison of the member's current income with his or her "prior income."

PHA Policy

The PHA defines *prior income*, or *prequalifying income*, as the family member's last certified income prior to qualifying for the EID.

The family member's prior, or prequalifying, income remains constant throughout the period that he or she is receiving the EID.

Initial 12-Month Exclusion

During the initial 12-month exclusion period, the full amount (100 percent) of any increase in income attributable to new employment or increased earnings is excluded. The 12 months are cumulative and need not be consecutive.

PHA Policy

The initial EID exclusion period will begin on the first of the month following the date an eligible member of a qualified family is first employed or first experiences an increase in earnings.

Second 12-Month Exclusion and Phase-In

During the second 12-month exclusion period, the exclusion is reduced to half (50 percent) of any increase in income attributable to employment or increased earnings. The 12 months are cumulative and need not be consecutive.

Lifetime Limitation

The EID has a four-year (48-month) lifetime maximum. The four-year eligibility period begins at the same time that the initial exclusion period begins and ends 48 months later. The one-time eligibility for the EID applies even if the eligible individual begins to receive assistance from another housing agency, if the individual moves between public housing and Section 8 assistance, or if there are breaks in assistance.

PHA Policy

During the 48-month eligibility period, the PHA will schedule and conduct an interim reexamination each time there is a change in the family member's annual income that affects or is affected by the EID (e.g., when the family member's income falls to a level at or below his/her prequalifying income, when one of the exclusion periods ends, and at the end of the lifetime maximum eligibility period).

6-I.F. BUSINESS INCOME [24 CFR 5.609(b)(2)]

Annual income includes “the net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family” [24 CFR 5.609(b)(2)].

Business Expenses

Net income is “gross income less business expense” [HCV GB, p. 5-19].

PHA Policy

To determine business expenses that may be deducted from gross income, the PHA will use current applicable Internal Revenue Service (IRS) rules for determining allowable business expenses [see IRS Publication 535], unless a topic is addressed by HUD regulations or guidance as described below.

Business Expansion

HUD regulations do not permit the PHA to deduct from gross income expenses for business expansion.

PHA Policy

Business expansion is defined as any capital expenditures made to add new business activities, to expand current facilities, or to operate the business in additional locations. For example, purchase of a street sweeper by a construction business for the purpose of adding street cleaning to the services offered by the business would be considered a business expansion. Similarly, the purchase of a property by a hair care business to open at a second location would be considered a business expansion.

Capital Indebtedness

HUD regulations do not permit the PHA to deduct from gross income the amortization of capital indebtedness.

PHA Policy

Capital indebtedness is defined as the principal portion of the payment on a capital asset such as land, buildings, and machinery. This means the PHA will allow as a business expense interest, but not principal, paid on capital indebtedness.

Negative Business Income

If the net income from a business is negative, no business income will be included in annual income; a negative amount will not be used to offset other family income.

Withdrawal of Cash or Assets from a Business

HUD regulations require the PHA to include in annual income the withdrawal of cash or assets from the operation of a business or profession unless the withdrawal reimburses a family member for cash or assets invested in the business by the family.

PHA Policy

Acceptable investments in a business include cash loans and contributions of assets or equipment. For example, if a member of an assisted family provided an up-front loan of \$2,000 to help a business get started, the PHA will not count as income any withdrawals from the business up to the amount of this loan until the loan has been repaid. Investments do not include the value of labor contributed to the business without compensation.

Co-owned Businesses

PHA Policy

If a business is co-owned with someone outside the family, the family must document the share of the business it owns. If the family's share of the income is lower than its share of ownership, the family must document the reasons for the difference.

6-I.G. ASSETS [24 CFR 5.609(b)(3) and 24 CFR 5.603(b)]

Overview

There is no asset limitation for participation in the HCV program. However, HUD requires that the PHA include in annual income the "interest, dividends, and other net income of any kind from real or personal property" [24 CFR 5.609(b)(3)]. This section discusses how the income from various types of assets is determined. For most types of assets, the PHA must determine the value of the asset in order to compute income from the asset. Therefore, for each asset type, this section discusses:

- How the value of the asset will be determined
- How income from the asset will be calculated

Exhibit 6-1 provides the regulatory requirements for calculating income from assets [24 CFR 5.609(b)(3)], and Exhibit 6-3 provides the regulatory definition of *net family assets*. This section begins with a discussion of general policies related to assets and then provides HUD rules and PHA policies related to each type of asset.

General Policies

Income from Assets

The PHA generally will use current circumstances to determine both the value of an asset and the anticipated income from the asset. As is true for all sources of income, HUD authorizes the PHA to use other than current circumstances to anticipate income when (1) an imminent change in circumstances is expected (2) it is not feasible to anticipate a level of income over 12 months or (3) the PHA believes that past income is the best indicator of anticipated income. For example, if a family member owns real property that typically receives rental income but the property is currently vacant, the PHA can take into consideration past rental income along with the prospects of obtaining a new tenant.

PHA Policy

Anytime current circumstances are not used to determine asset income, a clear rationale for the decision will be documented in the file. In such cases the family may present

information and documentation to the PHA to show why the asset income determination does not represent the family's anticipated asset income.

Valuing Assets

The calculation of asset income sometimes requires the PHA to make a distinction between an asset's market value and its cash value.

- The market value of an asset is its worth (e.g., the amount a buyer would pay for real estate or the balance in an investment account).
- The cash value of an asset is its market value less all reasonable amounts that would be incurred when converting the asset to cash.

PHA Policy

Reasonable costs that would be incurred when disposing of an asset include, but are not limited to, penalties for premature withdrawal, broker and legal fees, and settlement costs incurred in real estate transactions [HCV GB, p. 5-28].

Lump-Sum Receipts

Payments that are received in a single lump sum, such as inheritances, capital gains, lottery winnings, insurance settlements, and proceeds from the sale of property, are generally considered assets, not income. However, such lump-sum receipts are counted as assets only if they are retained by a family in a form recognizable as an asset (e.g., deposited in a savings or checking account) [RHIIP FAQs]. (For a discussion of lump-sum payments that represent the delayed start of a periodic payment, most of which are counted as income, see sections 6-I.H and 6-I.I.)

Imputing Income from Assets [24 CFR 5.609(b)(3)]

When net family assets are \$5,000 or less, the PHA will include in annual income the actual income anticipated to be derived from the assets. When the family has net family assets in excess of \$5,000, the PHA will include in annual income the greater of (1) the actual income derived from the assets or (2) the imputed income. Imputed income from assets is calculated by multiplying the total cash value of all family assets by the current HUD-established passbook savings rate.

Determining Actual Anticipated Income from Assets

It may or may not be necessary for the PHA to use the value of an asset to compute the actual anticipated income from the asset. When the value is required to compute the anticipated income from an asset, the market value of the asset is used. For example, if the asset is a property for which a family receives rental income, the anticipated income is determined by annualizing the actual monthly rental amount received for the property; it is not based on the property's market value. However, if the asset is a savings account, the anticipated income is determined by multiplying the market value of the account by the interest rate on the account.

Withdrawal of Cash or Liquidation of Investments

Any withdrawal of cash or assets from an investment will be included in income except to the extent that the withdrawal reimburses amounts invested by the family. For example, when a family member retires, the amount received by the family from a retirement plan is not counted as income until the family has received payments equal to the amount the family member

deposited into the retirement fund.

Jointly Owned Assets

The regulation at 24 CFR 5.609(a)(4) specifies that annual income includes “amounts derived (during the 12-month period) from assets to which any member of the family has access.”

PHA Policy

If an asset is owned by more than one person and any family member has unrestricted access to the asset, the PHA will count the full value of the asset. A family member has unrestricted access to an asset when he or she can legally dispose of the asset without the consent of any of the other owners.

If an asset is owned by more than one person, including a family member, but the family member does not have unrestricted access to the asset, the PHA will prorate the asset according to the percentage of ownership. If no percentage is specified or provided for by state or local law, the PHA will prorate the asset evenly among all owners.

Assets Disposed Of for Less than Fair Market Value [24 CFR 5.603(b)]

HUD regulations require the PHA to count as a current asset any business or family asset that was disposed of for less than fair market value during the two years prior to the effective date of the examination/reexamination, except as noted below.

Minimum Threshold

The *HVC Guidebook* permits the PHA to set a threshold below which assets disposed of for less than fair market value will not be counted [HCV GB, p. 5-27].

PHA Policy

The PHA will not include the value of assets disposed of for less than fair market value unless the cumulative fair market value of all assets disposed of during the past two years exceeds the gross amount received for the assets by more than \$1,000.

When the two-year period expires, the income assigned to the disposed asset(s) also expires. If the two-year period ends between annual recertification's, the family may request an interim recertification to eliminate consideration of the asset(s).

Assets placed by the family in non-revocable trusts are considered assets disposed of for less than fair market value except when the assets placed in trust were received through settlements or judgments.

Separation or Divorce

The regulation also specifies that assets are not considered disposed of for less than fair market value if they are disposed of as part of a separation or divorce settlement and the applicant or tenant receives important consideration not measurable in dollar terms.

PHA Policy

All assets disposed of as part of a separation or divorce settlement will be considered assets for which important consideration not measurable in monetary terms has been received. In order to qualify for this exemption, a family member must be subject to a formal separation or divorce settlement agreement established through arbitration,

mediation, or court order.

Foreclosure or Bankruptcy

Assets are not considered disposed of for less than fair market value when the disposition is the result of a foreclosure or bankruptcy sale.

Family Declaration

PHA Policy

Families must sign a declaration form at initial certification and each annual recertification identifying all assets that have been disposed of for less than fair market value or declaring that no assets have been disposed of for less than fair market value. The PHA may verify the value of the assets disposed of if other information available to the PHA does not appear to agree with the information reported by the family.

Types of Assets

Checking and Savings Accounts

For regular checking accounts and savings accounts, *cash value* has the same meaning as *market value*. If a checking account does not bear interest, the anticipated income from the account is zero.

PHA Policy

In determining the value of a checking account, the PHA will use the current balance.

Investment Accounts Such as Stocks, Bonds, Saving Certificates, and Money Market Funds

Interest or dividends earned by investment accounts are counted as actual income from assets even when the earnings are reinvested. The cash value of such an asset is determined by deducting from the market value any broker fees, penalties for early withdrawal, or other costs of converting the asset to cash.

PHA Policy

In determining the market value of an investment account, the PHA will use the value of the account on the most recent investment report.

How anticipated income from an investment account will be calculated depends on whether the rate of return is known. For assets that are held in an investment account with a known rate of return (e.g., savings certificates), asset income will be calculated based on that known rate (market value multiplied by rate of earnings). When the anticipated rate of return is not known (e.g., stocks), the PHA will calculate asset income based on the earnings for the most recent reporting period.

Equity in Real Property or Other Capital Investments

Equity (cash value) in a property or other capital asset is the estimated current market value of the asset less the unpaid balance on all loans secured by the asset and reasonable costs (such as broker fees) that would be incurred in selling the asset [HCV GB, p. 5-25].

SFHA Policy

In determining the equity, the SFHA will determine market value by examining recent sales of at least three properties in the surrounding or similar neighborhood that possess comparable factors that affect market value.

The SFHA will first use the payoff amount for the loan (mortgage) as the unpaid balance to calculate equity. If the payoff amount is not available, the PHA will use the basic loan balance information to deduct from the market value in the equity calculation.

Equity in real property and other capital investments is considered in the calculation of asset income except for the following types of assets:

- Equity accounts in HUD homeownership programs [24 CFR5.603(b)]

- The value of a home currently being purchased with assistance under the HCV program Homeownership Option for the first 10 years after the purchase date of the home [24 CFR 5.603(b), Notice PIH 2012-3]
- Equity in owner-occupied cooperatives and manufactured homes in which the family lives [HCV GB, p. 5-25]
- Equity in real property when a family member's main occupation is real estate [HCV GB, p. 5-25]. This real estate is considered a business asset, and income related to this asset will be calculated as described in section 6-I.F.
- Interests in Indian Trust lands [24 CFR 5.603(b)]
- Real property and capital assets that are part of an active business or farming operation [HCV GB, p. 5-25]

The PHA must also deduct from the equity the reasonable costs for converting the asset to cash. Using the formula for calculating equity specified above, the net cash value of real property is the market value of the loan (mortgage) minus the expenses to convert to cash [Notice PIH 2012-3].

SFHA Policy

For the purposes of calculating expenses to convert to cash for real property, the SFHA will use ten percent of the market value of the home.

A family may have real property as an asset in two ways: (1) owning the property itself and (2) holding a mortgage or deed of trust on the property. In the case of a property owned by a family member, the anticipated asset income generally will be in the form of rent or other payment for the use of the property. If the property generates no income, actual anticipated income from the asset will be zero.

In the case of a mortgage or deed of trust held by a family member, the outstanding balance (unpaid principal) is the cash value of the asset. The interest portion only of payments made to the family in accordance with the terms of the mortgage or deed of trust is counted as anticipated asset income.

PHA Policy

In the case of capital investments owned jointly with others not living in a family's unit, a prorated share of the property's cash value will be counted as an asset unless the PHA determines that the family receives no income from the property and is unable to sell or otherwise convert the asset to cash.

Trusts

A *trust* is a legal arrangement generally regulated by state law in which one party (the creator or

grantor) transfers property to a second party (the trustee) who holds the property for the benefit of one or more third parties (the beneficiaries).

Revocable Trusts

If any member of a family has the right to withdraw the funds in a trust, the value of the trust is considered an asset [HCV GB, p. 5-25]. Any income earned as a result of investment of trust funds is counted as actual asset income, whether the income is paid to the family or deposited in the trust.

Nonrevocable Trusts

In cases where a trust is not revocable by, or under the control of, any member of a family, the value of the trust fund is not considered an asset. However, any income distributed to the family from such a trust is counted as a periodic payment or a lump-sum receipt, as appropriate [24 CFR 5.603(b)]. (Periodic payments are covered in section 6-I.H. Lump-sum receipts are discussed earlier in this section.)

Retirement Accounts

Company Retirement/Pension Accounts

In order to correctly include or exclude as an asset any amount held in a company retirement or pension account by an employed person, the PHA must know whether the money is accessible before retirement [HCV GB, p. 5-26].

While a family member is employed, only the amount the family member can withdraw without retiring or terminating employment is counted as an asset [HCV GB, p. 5-26].

After a family member retires or terminates employment, any amount distributed to the family member is counted as a periodic payment or a lump-sum receipt, as appropriate [HCV GB, p. 5-26], except to the extent that it represents funds invested in the account by the family member. (For more on periodic payments, see section 6-I.H.) The balance in the account is counted as an asset only if it remains accessible to the family member.

IRA, Keogh, and Similar Retirement Savings Accounts

IRA, Keogh, and similar retirement savings accounts are counted as assets even though early withdrawal would result in a penalty [HCV GB, p. 5-25].

Personal Property

Personal property held as an investment, such as gems, jewelry, coin collections, antique cars, etc., is considered an asset [HCV GB, p. 5-25].

PHA Policy

In determining the value of personal property held as an investment, the PHA will use the family's estimate of the value. The PHA may obtain an appraisal to confirm the value of the asset if there is reason to believe that the family's estimated value is off by \$50 or more. The family must cooperate with the appraiser, but cannot be charged any costs related to the appraisal.

Generally, personal property held as an investment generates no income until it is disposed of. If regular income is generated (e.g., income from renting the personal property), the amount that is expected to be earned in the coming year is counted as actual income from the asset.

Necessary items of personal property are not considered assets [24 CFR 5.603(b)].

PHA Policy

Necessary personal property consists of only those items not held as an investment, and may include clothing, furniture, household furnishings, jewelry, and vehicles, including those specially equipped for persons with disabilities.

Life Insurance

The cash value of a life insurance policy available to a family member before death, such as a whole life or universal life policy, is included in the calculation of the value of the family's assets [HCV GB 5-25]. The cash value is the surrender value. If such a policy earns dividends or interest that the family could elect to receive, the anticipated amount of dividends or interest is counted as income from the asset whether or not the family actually receives it.

6-I.H. PERIODIC PAYMENTS

Periodic payments are forms of income received on a regular basis. HUD regulations specify periodic payments that are and are not included in annual income.

Periodic Payments Included in Annual Income

- Periodic payments from sources such as social security, unemployment and welfare assistance, annuities, insurance policies, retirement funds, and pensions. However, periodic payments from retirement accounts, annuities, and similar forms of investments are counted only after they exceed the amount contributed by the family [24 CFR 5.609(b)(4) and (b)(3)].
- Disability or death benefits and lottery receipts paid periodically, rather than in a single lump sum [24 CFR 5.609(b)(4) and HCV, p. 5-14].

Lump-Sum Payments for the Delayed Start of a Periodic Payment

Most lump-sums received as a result of delays in processing periodic payments, such as unemployment or welfare assistance, are counted as income. However, lump-sum receipts for the delayed start of periodic social security or supplemental security income (SSI) payments are not

counted as income [CFR 5.609(b)(4)]. Additionally, any deferred disability benefits that are received in a lump-sum or in prospective monthly amounts from the Department of Veterans Affairs are to be excluded from annual income [FR Notice 11/24/08].

PHA Policy

When a delayed-start payment is received and reported during the period in which the PHA is processing an annual reexamination, the PHA will adjust the family share and PHA subsidy retroactively for the period the payment was intended to cover. The family may pay in full any amount due or request to enter into a repayment agreement with the PHA.

Treatment of Overpayment Deductions from Social Security Benefits

The PHA must make a special calculation of annual income when the Social Security Administration (SSA) overpays an individual, resulting in a withholding or deduction from his or her benefit amount until the overpayment is paid in full. The amount and duration of the withholding will vary depending on the amount of the overpayment and the percent of the benefit rate withheld. Regardless of the amount withheld or the length of the withholding period, the PHA must use the reduced benefit amount after deducting only the amount of the overpayment withholding from the gross benefit amount [Notice PIH 2012-10].

Periodic Payments Excluded from Annual Income

- Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the assisted family, who are unable to live alone) [24 CFR 5.609(c)(2)]. Kinship guardianship assistance payments (Kin-GAP) and other similar guardianship payments are treated the same as foster care payments and are likewise excluded from annual income [Notice PIH 2012-1].

PHA Policy

The PHA will exclude payments for the care of foster children and foster adults only if the care is provided through an official arrangement with a local welfare agency [HCV GB, p. 5-18].

- Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home [24 CFR 5.609(c)(16)].
- Amounts received under the Low-Income Home Energy Assistance Program (42 U.S.C. 1626(c)) [24 CFR 5.609(c)(17)].
- Amounts received under the Child Care and Development Block Grant Act of 1990 (42 U.S.C. 9858q) [24 CFR 5.609(c)(17)].
- Earned Income Tax Credit (EITC) refund payments (26 U.S.C. 32(j)) [24 CFR 5.609(c)(17)]. *Note:* EITC may be paid periodically if the family elects to receive the amount due as part of payroll payments from an employer.
- Lump-sums received as a result of delays in processing Social Security and SSI payments (see section 6-I.J.) [24 CFR 5.609(b)(4)].

- Lump-sums or prospective monthly amounts received as deferred disability benefits from the Department of Veterans Affairs (VA) [FR Notice 11/24/08].

6-I.I. PAYMENTS IN LIEU OF EARNINGS

Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation, and severance pay, are counted as income [24 CFR 5.609(b)(5)] if they are received either in the form of periodic payments or in the form of a lump-sum amount or prospective monthly amounts for the delayed start of a periodic payment. If they are received in a one-time lump sum (as a settlement, for instance), they are treated as lump-sum receipts [24 CFR 5.609(c)(3)]. (See also the discussion of periodic payments in section 6-I.H and the discussion of lump-sum receipts in section 6-I.G.)

6-I.J. WELFARE ASSISTANCE

Overview

Welfare assistance is counted in annual income. Welfare assistance includes Temporary Assistance for Needy Families (TANF) and any payments to individuals or families based on need that are made under programs funded separately or jointly by federal, state, or local governments [24 CFR 5.603(b)].

Sanctions Resulting in the Reduction of Welfare Benefits [24 CFR 5.615]

The PHA must make a special calculation of annual income when the welfare agency imposes certain sanctions on certain families. The full text of the regulation at 24 CFR 5.615 is provided as Exhibit 6-5. The requirements are summarized below. This rule applies only if a family was receiving HCV assistance at the time the sanction was imposed.

Covered Families

The families covered by 24 CFR 5.615 are those “who receive welfare assistance or other public assistance benefits (‘welfare benefits’) from a State or other public agency (‘welfare agency’) under a program for which Federal, State or local law requires that a member of the family must participate in an economic self-sufficiency program as a condition for such assistance” [24 CFR 5.615(b)]

Imputed Income

When a welfare agency imposes a sanction that reduces a family's welfare income because the family commits fraud or fails to comply with the agency's economic self-sufficiency program or work activities requirement, the PHA must include in annual income “imputed” welfare income. The PHA must request that the welfare agency inform the PHA when the benefits of an HCV participant family are reduced. The imputed income is the amount the family would have received if the family had not been sanctioned.

This requirement does not apply to reductions in welfare benefits: (1) at the expiration of the lifetime or other time limit on the payment of welfare benefits, (2) if a family member is unable to find employment even though the family member has complied with the welfare agency economic self-sufficiency or work activities requirements, or (3) because a family member has not complied with other welfare agency requirements [24 CFR 5.615(b)(2)].

Offsets

The amount of the imputed income is offset by the amount of additional income the family begins to receive after the sanction is imposed. When the additional income equals or exceeds the imputed welfare income, the imputed income is reduced to zero [24 CFR 5.615(c)(4)].

6-I.K. PERIODIC AND DETERMINABLE ALLOWANCES [24 CFR 5.609(b)(7)]

Annual income includes periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from organizations or from persons not residing with an assisted family.

Alimony and Child Support

The PHA must count alimony or child support amounts awarded as part of a divorce or separation agreement.

PHA Policy

The PHA will count court-awarded amounts for alimony and child support unless the PHA verifies that: (1) the payments are not being made, and (2) the family has made reasonable efforts to collect amounts due, including filing with courts or agencies responsible for enforcing payments [HCV GB, pp. 5-23 and 5-47].

Families who do not have court-awarded alimony and child support awards are not required to seek a court award and are not required to take independent legal action to obtain collection.

Regular Contributions or Gifts

The PHA must count as income regular monetary and nonmonetary contributions or gifts from persons not residing with an assisted family [24 CFR 5.609(b)(7)]. Temporary, nonrecurring, or sporadic income and gifts are not counted [24 CFR 5.609(c)(9)].

PHA Policy

Examples of regular contributions include: (1) regular payment of a family's bills (e.g., utilities, telephone, rent, credit cards, and car payments), (2) cash or other liquid assets provided to any family member on a regular basis, and (3) "in-kind" contributions such as groceries and clothing provided to a family on a regular basis.

Nonmonetary contributions will be valued at the cost of purchasing the items, as determined by the PHA. For contributions that may vary from month to month (e.g., utility payments), the PHA will include an average amount based upon past history.

6-I.L. STUDENT FINANCIAL ASSISTANCE [24 CFR 5.609(b)(9)]

In 2005, Congress passed a law (for section 8 programs only) requiring that certain student financial assistance be included in annual income. Prior to that, the full amount of student financial assistance was excluded. For some students, the full exclusion still applies.

Student Financial Assistance Included in Annual Income [24 CFR 5.609(b)(9) and FR 4/10/06]

The regulation requiring the inclusion of certain student financial assistance applies only to students who satisfy all of the following conditions:

- They are enrolled in an institution of higher education, as defined under the Higher Education Act (HEA) of 1965.
- They are seeking or receiving Section 8 assistance on their own—that is, apart from their parents—through the HCV program, the project-based certificate program, the project-based voucher program, or the moderate rehabilitation program.
- They are under 24 years of age **OR** they have no dependent children.

For students who satisfy these three conditions, any financial assistance in excess of tuition received: (1) under the 1965 HEA, (2) from a private source, or (3) from an institution of higher education, as defined under the 1965 HEA, must be included in annual income.

To determine annual income in accordance with the above requirements, the PHA will use the definitions of *dependent child*, *institution of higher education*, and *parents* in Section 3-II.E, along with the following definitions [FR 4/10/06, pp. 18148-18150]:

- *Assistance under the Higher Education Act of 1965* includes Pell Grants, Federal Supplement Educational Opportunity Grants, Academic Achievement Incentive Scholarships, State Assistance under the Leveraging Educational Assistance Partnership Program, the Robert G. Byrd Honors Scholarship Program, and Federal Work Study programs.
- *Assistance from private sources* means assistance from nongovernmental sources, including parents, guardians, and other persons not residing with the student in an HCV assisted unit.
- *Tuition* will have the meaning given this term by the institution of higher education in which the student is enrolled.

Student Financial Assistance Excluded from Annual Income [24 CFR 5.609(c)(6)]

Any student financial assistance not subject to inclusion under 24 CFR 5.609(b)(9) is fully excluded from annual income under 24 CFR 5.609(c)(6), whether it is paid directly to the student or to the educational institution the student is attending. This includes any financial assistance received by:

- Students residing with parents who are seeking or receiving Section 8 assistance
- Students who are enrolled in an educational institution that does **not** meet the 1965 HEA definition of *institution of higher education*
- Students who are over 23 **AND** have at least one dependent child, as defined in Section 3-II.E
- Students who are receiving financial assistance through a governmental program not authorized under the 1965 HEA.

6-I.M. ADDITIONAL EXCLUSIONS FROM ANNUAL INCOME

Other exclusions contained in 24 CFR 5.609(c) that have not been discussed earlier in this chapter include the following:

- Reimbursement of medical expenses [24 CFR 5.609(c)(4)]
- Amounts received by participants in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred and which are made solely to allow participation in a specific program [24 CFR 5.609(c)(8)(iii)]
- Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS) [(24 CFR 5.609(c)(8)(ii)]
- Foster care payments issued by the San Francisco Human Services Agency to caregivers of foster children according to 24 CFR 5.609(c)(2).
- Payments received under the Kin-GAP program, as well as other similar foster care assistance programs in other states, may be considered as payments received for the care of foster children thereby qualifying these payments to be excluded from income. (HUD Correspondence to Representative Maxine Waters, dated April 8, 2008.)
- Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era [24 CFR 5.609(c)(10)]
- Adoption assistance payments in excess of \$480 per adopted child [24 CFR 5.609(c)(12)]
- Refunds or rebates on property taxes paid on the dwelling unit [24 CFR 5.609(c)(15)]
- Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home [24 CFR 5.609(c)(16)]
- Amounts specifically excluded by any other federal statute [24 CFR 5.609(c)(17)]. HUD publishes an updated list of these exclusions periodically. It includes:
 - (a) The value of the allotment provided to an eligible household under the Food Stamp Act of 1977 (7 U.S.C. 2017 (b))
 - (b) Payments to Volunteers under the Domestic Volunteer Services Act of 1973 (42 U.S.C. 5044(g), 5058)
 - (c) Payments received under the Alaska Native Claims Settlement Act (43 U.S.C. 1626(c))
 - (d) Income derived from certain sub marginal land of the United States that is held in trust for certain Indian tribes (25 U.S.C. 459e)
 - (e) Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program (42 U.S.C. 8624(f))
 - (f) Payments received under programs funded in whole or in part under the Job Training Partnership Act (29 U.S.C. 1552(b)) (Effective July 1, 2000, references to Job Training Partnership Act shall be deemed to refer to the corresponding provision of the Workforce Investment Act of 1998 (29 U.S.C. 2931).)

- (g) Income derived from the disposition of funds to the Grand River Band of Ottawa Indians (Pub. L. 94-540, 90 Stat. 2503-04)
- (h) The first \$2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U. S. Claims Court, the interests of individual Indians in trust or restricted lands, including the first \$2,000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands (25 U.S.C. 1407-1408)
- (i) Payments received from programs funded under Title V of the Older Americans Act of 1985 (42 U.S.C. 3056(f))
- (j) Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in *In Re Agent*-product liability litigation, M.D.L. No. 381 (E.D.N.Y.)
- (k) Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721)
- (l) The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990 (42 U.S.C. 9858q)
- (m) Earned income tax credit (EITC) refund payments received on or after January 1, 1991 (26 U.S.C. 32(j))
- (n) Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation (Pub. L. 95-433)
- (o) Allowances, earnings and payments to AmeriCorps participants under the National and Community Service Act of 1990 (42 U.S.C. 12637(d))
- (p) Any allowance paid under the provisions of 38 U.S.C. 1805 to a child suffering from spina bifida who is the child of a Vietnam veteran (38 U.S.C. 1805)
- (q) Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act (42 U.S.C. 10602)
- (r) Allowances, earnings and payments to individuals participating in programs under the Workforce Investment Act of 1998 (29 U.S.C. 2931)

PART II

ADJUSTED INCOME

6-II.A. INTRODUCTION

Overview

HUD regulations require PHAs to deduct from annual income any of five mandatory deductions for which a family qualifies. The resulting amount is the family's adjusted income. Mandatory deductions are found in 24 CFR 5.611.

5.611(a) Mandatory deductions. In determining adjusted income, the responsible entity [PHA] must deduct the following amounts from annual income:

- (1) \$480 for each dependent;
- (2) \$400 for any elderly family or disabled family;
- (3) The sum of the following, to the extent the sum exceeds three percent of annual income:
 - (i) Unreimbursed medical expenses of any elderly family or disabled family;
 - (ii) Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed. This deduction may not exceed the earned income received by family members who are 18 years of age or older and who are able to work because of such attendant care or auxiliary apparatus; and
- (4) Any reasonable child care expenses necessary to enable a member of the family to be employed or to further his or her education.

This part covers policies related to these mandatory deductions. Verification requirements related to these deductions are found in Chapter 7.

Anticipating Expenses

PHA Policy

Generally, the PHA will use current circumstances to anticipate expenses. When possible, for costs that are expected to fluctuate during the year (e.g., child care during school and non-school periods and cyclical medical expenses), the PHA will estimate costs based on historic data and known future costs.

If a family has an accumulated debt for medical or disability assistance expenses, the PHA will include as an eligible expense the portion of the debt that the family expects to pay during the period for which the income determination is being made. However, amounts previously deducted will not be allowed even if the amounts were not paid as expected in a preceding period. The PHA may require the family to provide documentation of payments made in the preceding year.

6-II.B. DEPENDENT DEDUCTION

A deduction of \$480 is taken for each dependent [24 CFR 5.611(a)(1)]. *Dependent* is defined as any family member other than the head, spouse, or co head who is under the age of 18 or who is 18 or older and is a person with disabilities or a full-time student. Foster children, foster adults, and live-in aides are never considered dependents [24 CFR 5.603(b)].

6-II.C. ELDERLY OR DISABLED FAMILY DEDUCTION

A single deduction of \$400 is taken for any elderly or disabled family [24 CFR 5.611(a)(2)]. An *elderly family* is a family whose head, spouse, co-head, or sole member is 62 years of age or older, and a *disabled family* is a family whose head, spouse, co-head, or sole member is a person with disabilities [24 CFR 5.403].

6-II.D. MEDICAL EXPENSES DEDUCTION [24 CFR 5.611(a)(3)(i)]

Unreimbursed medical expenses may be deducted to the extent that, in combination with any disability assistance expenses, they exceed three percent of annual income.

The medical expense deduction is permitted only for families in which the head, spouse, or co head is at least 62 or is a person with disabilities. If a family is eligible for a medical expense deduction, the medical expenses of all family members are counted [VG, p. 28].

Definition of *Medical Expenses*

HUD regulations define *medical expenses* at 24 CFR 5.603(b) to mean “medical expenses, including medical insurance premiums, that are anticipated during the period for which annual income is computed, and that are not covered by insurance.”

PHA Policy

The most current IRS Publication 502, *Medical and Dental Expenses*, will be used to determine the costs that qualify as medical expenses.

Summary of Allowable Medical Expenses from IRS Publication 502	
Services of medical professionals	Substance abuse treatment programs
Surgery and medical procedures that are necessary, legal, noncosmetic	Psychiatric treatment
Services of medical facilities	Ambulance services and some costs of transportation related to medical expenses
Hospitalization, long-term care, and in-home nursing services	The cost and care of necessary equipment related to a medical condition (e.g., eyeglasses/lenses, hearing aids, crutches, and artificial teeth)
Prescription medicines and insulin, but <u>not</u> nonprescription medicines even if recommended by a doctor	Cost and continuing care of necessary service animals
Improvements to housing directly related to medical needs (e.g., ramps for a wheel chair, handrails)	

	Medical insurance premiums or the cost of a health maintenance organization (HMO)
<p>Note: This chart provides a summary of eligible medical expenses only. Detailed information is provided in IRS Publication 502. Medical expenses are considered only to the extent they are not reimbursed by insurance or some other source.</p>	

Families That Qualify for Both Medical and Disability Assistance Expenses

PHA Policy

This policy applies only to families in which the head, spouse, or co head is 62 or older or is a person with disabilities.

When expenses anticipated by a family could be defined as either medical or disability assistance expenses, the PHA will consider them medical expenses unless it is clear that the expenses are incurred exclusively to enable a person with disabilities to work.

6-II.E. DISABILITY ASSISTANCE EXPENSES DEDUCTION [24 CFR 5.603(b) and 24 CFR 5.611(a)(3)(ii)]

Reasonable expenses for attendant care and auxiliary apparatus for a disabled family member may be deducted if they: (1) are necessary to enable a family member 18 years or older to work, (2) are not paid to a family member or reimbursed by an outside source, (3) in combination with any medical expenses, exceed three percent of annual income, and (4) do not exceed the earned income received by the family member who is enabled to work.

Earned Income Limit on the Disability Assistance Expense Deduction

A family can qualify for the disability assistance expense deduction only if at least one family member (who may be the person with disabilities) is enabled to work [24 CFR 5.603(b)].

The disability expense deduction is capped by the amount of “earned income received by family members who are 18 years of age or older and who are able to work” because of the expense [24 CFR 5.611(a)(3)(ii)]. The earned income used for this purpose is the amount verified before any earned income disallowances or income exclusions are applied.

PHA Policy

The family must identify the family members enabled to work as a result of the disability assistance expenses. In evaluating the family’s request, the PHA will consider factors such as how the work schedule of the relevant family members relates to the hours of care provided, the time required for transportation, the relationship of the family members to the person with disabilities, and any special needs of the person with disabilities that might determine which family members are enabled to work.

When the PHA determines that the disability assistance expenses enable more than one family member to work, the expenses will be capped by the sum of the family members’ incomes.

Eligible Disability Expenses

Examples of auxiliary apparatus are provided in the *HCV Guidebook* as follows: “Auxiliary apparatus are items such as wheelchairs, ramps, adaptations to vehicles, or special equipment to enable a blind person to read or type, but only if these items are directly related to permitting the disabled person or other family member to work” [HCV GB, p. 5-30].

HUD advises PHAs to further define and describe auxiliary apparatus [VG, p. 30].

Eligible Auxiliary Apparatus

PHA Policy

Expenses incurred for maintaining or repairing an auxiliary apparatus are eligible. In the case of an apparatus that is specially adapted to accommodate a person with disabilities (e.g., a vehicle or computer), the cost to maintain the special adaptations (but not maintenance of the apparatus itself) is an eligible expense. The cost of service animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included.

Eligible Attendant Care

The family determines the type of attendant care that is appropriate for the person with disabilities.

PHA Policy

Attendant care includes, but is not limited to, reasonable costs for home medical care, nursing services, in-home or center-based care services, interpreters for persons with hearing impairments, and readers for persons with visual disabilities.

Attendant care expenses will be included for the period that the person enabled to work is employed plus reasonable transportation time. The cost of general housekeeping and personal services is not an eligible attendant care expense. However, if the person enabled to work is the person with disabilities, personal services necessary to enable the person with disabilities to work are eligible.

If the care attendant also provides other services to the family, the PHA will prorate the cost and allow only that portion of the expenses attributable to attendant care that enables a family member to work. For example, if the care provider also cares for a child who is not the person with disabilities, the cost of care must be prorated. Unless otherwise specified by the care provider, the calculation will be based upon the number of hours spent in each activity and/or the number of persons under care.

Payments to Family Members

No disability assistance expenses may be deducted for payments to a member of an assisted family [24 CFR 5.603(b)]. However, expenses paid to a relative who is not a member of the assisted family may be deducted if they are not reimbursed by an outside source.

Necessary and Reasonable Expenses

The family determines the type of care or auxiliary apparatus to be provided and must describe

how the expenses enable a family member to work. The family must certify that the disability assistance expenses are necessary and are not paid or reimbursed by any other source.

PHA Policy

The PHA determines the reasonableness of the expenses based on typical costs of care or apparatus in the locality. To establish typical costs, the PHA will collect information from organizations that provide services and support to persons with disabilities. A family may present, and the PHA will consider, the family's justification for costs that exceed typical costs in the area.

Families That Qualify for Both Medical and Disability Assistance Expenses

PHA Policy

This policy applies only to families in which the head or spouse is 62 or older or is a person with disabilities.

When expenses anticipated by a family could be defined as either medical or disability assistance expenses, the PHA will consider them medical expenses unless it is clear that the expenses are incurred exclusively to enable a person with disabilities to work.

6-II.F. CHILD CARE EXPENSE DEDUCTION

HUD defines *child care expenses* at 24 CFR 5.603(b) as “amounts anticipated to be paid by the family for the care of children under 13 years of age during the period for which annual income is computed, but only where such care is necessary to enable a family member to actively seek employment, be gainfully employed, or to further his or her education and only to the extent such amounts are not reimbursed. The amount deducted shall reflect reasonable charges for child care. In the case of child care necessary to permit employment, the amount deducted shall not exceed the amount of employment income that is included in annual income.”

Clarifying the Meaning of *Child* for This Deduction

Child care expenses do not include child support payments made to another on behalf of a minor who is not living in an assisted family's household [VG, p. 26]. However, child care expenses for foster children that are living in the assisted family's household, are included when determining the family's child care expenses [HCV GB, p. 5-29].

Qualifying for the Deduction

Determining Who Is Enabled to Pursue an Eligible Activity

PHA Policy

The family must identify the family member(s) enabled to pursue an eligible activity. The term *eligible activity* in this section means any of the activities that may make the family eligible for a child care deduction (seeking work, pursuing an education, or being gainfully employed).

In evaluating the family's request, the PHA will consider factors such as how the schedule for the claimed activity relates to the hours of care provided, the time required for transportation, the relationship of the family member(s) to the child, and any special needs of the child that might help determine which family member is enabled to pursue an eligible activity.

Seeking Work

PHA Policy

If the child care expense being claimed is to enable a family member to seek employment, the family must provide evidence of the family member's efforts to obtain employment at each reexamination. The deduction may be reduced or denied if the family member's job search efforts are not commensurate with the child care expense being allowed by the PHA.

Furthering Education

PHA Policy

If the child care expense being claimed is to enable a family member to further his or her education, the member must be enrolled in school (academic or vocational) or participating in a formal training program. The family member is not required to be a full-time student, but the time spent in educational activities must be commensurate with the child care claimed.

Being Gainfully Employed

PHA Policy

If the child care expense being claimed is to enable a family member to be gainfully employed, the family must provide evidence of the family member's employment during the time that child care is being provided. Gainful employment is any legal work activity (full- or part-time) for which a family member is compensated.

Earned Income Limit on Child Care Expense Deduction

When a family member looks for work or furthers his or her education, there is no cap on the amount that may be deducted for child care – although the care must still be necessary and reasonable. However, when child care enables a family member to work, the deduction is capped by “the amount of employment income that is included in annual income” [24 CFR 5.603(b)].

The earned income used for this purpose is the amount of earned income verified after any earned income disallowances or income exclusions are applied.

When the person who is enabled to work is a person with disabilities who receives the earned income disallowance (EID) or a full-time student whose earned income above \$480 is excluded, child care costs related to enabling a family member to work may not exceed the portion of the person’s earned income that actually is included in annual income. For example, if a family member who qualifies for the EID makes \$15,000 but because of the EID only \$5,000 is included in annual income, child care expenses are limited to \$5,000.

The PHA must not limit the deduction to the least expensive type of child care. If the care allows the family to pursue more than one eligible activity, including work, the cap is calculated in proportion to the amount of time spent working [HCV GB, p. 5-30].

PHA Policy

When the child care expense being claimed is to enable a family member to work, only one family member’s income will be considered for a given period of time. When more than one family member works during a given period, the PHA generally will limit allowable child care expenses to the earned income of the lowest-paid member. The family may provide information that supports a request to designate another family member as the person enabled to work.

Eligible Child Care Expenses

The type of care to be provided is determined by the assisted family. The PHA may not refuse to give a family the child care expense deduction because there is an adult family member in the household that may be available to provide child care [VG, p. 26].

Allowable Child Care Activities

PHA Policy

For school-age children, costs attributable to public or private school activities during standard school hours are not considered. Expenses incurred for supervised activities after school or during school holidays (e.g., summer day camp, after-school sports league) are allowable forms of child care.

The costs of general housekeeping and personal services are not eligible. Likewise, child care expenses paid to a family member who lives in the family's unit are not eligible; however, payments for child care to relatives who do not live in the unit are eligible.

If a child care provider also renders other services to a family or child care is used to enable a family member to conduct activities that are not eligible for consideration, the PHA will prorate the costs and allow only that portion of the expenses that is attributable to child care for eligible activities. For example, if the care provider also cares for a child with disabilities who is 13 or older, the cost of care will be prorated. Unless otherwise specified by the child care provider, the calculation will be based upon the number of hours spent in each activity and/or the number of persons under care.

Necessary and Reasonable Costs

Child care expenses will be considered necessary if: (1) a family adequately explains how the care enables a family member to work, actively seek employment, or further his or her education, and (2) the family certifies, and the child care provider verifies, that the expenses are not paid or reimbursed by any other source.

PHA Policy

Child care expenses will be considered for the time required for the eligible activity plus reasonable transportation time. For child care that enables a family member to go to school, the time allowed may include not more than one study hour for each hour spent in class.

To establish the reasonableness of child care costs, the PHA will use the schedule of child care costs from the local welfare agency. Families may present, and the PHA will consider, justification for costs that exceed typical costs in the area.

PART III

CALCULATING FAMILY SHARE AND PHA SUBSIDY

6-III.A. OVERVIEW OF RENT AND SUBSIDY CALCULATIONS

TTP Formula [24 CFR 5.628]

HUD regulations specify the formula for calculating the total tenant payment (TTP) for an assisted family. TTP is the highest of the following amounts, rounded to the nearest dollar:

- 30 percent of the family's monthly adjusted income (adjusted income is defined in Part II)
- 10 percent of the family's monthly gross income (annual income, as defined in Part I, divided by 12)
- The welfare rent (in as-paid states only)
- A minimum rent between \$0 and \$50 that is established by the PHA

The PHA has authority to suspend and exempt families from minimum rent when a financial hardship exists, as defined in section 6-III.B.

The amount that a family pays for rent and utilities (the family share) will never be less than the family's TTP but may be greater than the TTP depending on the rent charged for the unit the family selects.

Welfare Rent [24 CFR 5.628]

PHA Policy

Welfare rent does not apply in this locality.

Minimum Rent [24 CFR 5.630]

PHA Policy

The minimum rent for this locality is \$0.

Family Share [24 CFR 982.305(a)(5)]

If a family chooses a unit with a gross rent (rent to owner plus an allowance for tenant-paid utilities) that exceeds the PHA's applicable payment standard: (1) the family will pay more than the TTP, and (2) at initial occupancy the PHA may not approve the tenancy if it would require the family share to exceed 40 percent of the family's monthly adjusted income. The income used for this determination must have been verified no earlier than 60 days before the family's voucher was issued. (For a discussion of the application of payment standards, see section 6-III.C.)

PHA Subsidy [24 CFR 982.505(b)]

The PHA will pay a monthly housing assistance payment (HAP) for a family that is equal to the lower of (1) the applicable payment standard for the family minus the family's TTP or (2) the gross rent for the family's unit minus the TTP. (For a discussion of the application of payment standards, see section 6-III.C.)

Utility Reimbursement [24 CFR 982.514(b)]

When the PHA subsidy for a family exceeds the rent to owner, the family is due a utility reimbursement. HUD permits the PHA to pay the reimbursement to the family or directly to the utility provider.

PHA Policy

The PHA will make utility reimbursements to the family.

6-III.B. FINANCIAL HARDSHIPS AFFECTING MINIMUM RENT [24 CFR 5.630]

PHA Policy

The financial hardship rules described below do not apply in this jurisdiction because the PHA has established a minimum rent of \$0.

Overview

If the PHA establishes a minimum rent greater than zero, the PHA must grant an exemption from the minimum rent if a family is unable to pay the minimum rent because of financial hardship.

The financial hardship exemption applies only to families required to pay the minimum rent. If a family's TTP is higher than the minimum rent, the family is not eligible for a hardship exemption. If the PHA determines that a hardship exists, the family share is the highest of the remaining components of the family's calculated TTP.

HUD-Defined Financial Hardship

Financial hardship includes the following situations:

- (1) The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program. This includes a family member who is a noncitizen lawfully admitted for permanent residence under the Immigration and Nationality Act who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996.

PHA Policy

A hardship will be considered to exist only if the loss of eligibility has an impact on the family's ability to pay the minimum rent.

For a family waiting for a determination of eligibility, the hardship period will end as of the first of the month following: (1) implementation of assistance, if approved, or (2) the decision to deny assistance. A family whose request for assistance is denied may request a hardship exemption based upon one of the other allowable hardship circumstances.

- (2) The family would be evicted because it is unable to pay the minimum rent.

PHA Policy

For a family to qualify under this provision, the cause of the potential eviction must be the family's failure to pay rent to the owner or tenant-paid utilities.

- (3) Family income has decreased because of changed family circumstances, including the loss of employment.
- (4) A death has occurred in the family.

PHA Policy

In order to qualify under this provision, a family must describe how the death has created a financial hardship (e.g., because of funeral-related expenses or the loss of the family member's income).

- (5) The family has experienced other circumstances determined by the PHA.

PHA Policy

The PHA has not established any additional hardship criteria.

Implementation of Hardship Exemption

Determination of Hardship

When a family requests a financial hardship exemption, the PHA must suspend the minimum rent requirement beginning the first of the month following the family’s request.

The PHA then determines whether the financial hardship exists and whether the hardship is temporary or long-term.

PHA Policy

The PHA defines temporary hardship as a hardship expected to last 90 days or less. Long-term hardship is defined as a hardship expected to last more than 90 days.

When the minimum rent is suspended, the family share reverts to the highest of the remaining components of the calculated TTP. The example below demonstrates the effect of the minimum rent exemption.

Example: Impact of Minimum Rent Exemption	
Assume the PHA has established a minimum rent of \$35.	
Family Share – No Hardship	Family Share – With Hardship
\$0 30% of monthly adjusted income	\$0 30% of monthly adjusted income
\$15 10% of monthly gross income	\$15 10% of monthly gross income
N/A Welfare rent	N/A Welfare rent
\$35 Minimum rent	\$35 Minimum rent
Minimum rent applies. TTP = \$35	Hardship exemption granted. TTP = \$15

PHA Policy

To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship and how the hardship has affected the family’s ability to pay the minimum rent.

The PHA will make the determination of hardship within 30 calendar days.

No Financial Hardship

If the PHA determines there is no financial hardship, the PHA will reinstate the minimum rent and require the family to repay the amounts suspended.

PHA Policy

The PHA will require the family to repay the suspended amount within 30 calendar days of the PHA's notice that a hardship exemption has not been granted.

Temporary Hardship

If the PHA determines that a qualifying financial hardship is temporary, the PHA must suspend the minimum rent for the 90-day period beginning the first of the month following the date of the family's request for a hardship exemption.

At the end of the 90-day suspension period, the family must resume payment of the minimum rent and must repay the PHA the amounts suspended. HUD requires the PHA to offer a reasonable repayment agreement, on terms and conditions established by the PHA. The PHA also may determine that circumstances have changed and the hardship is now a long-term hardship.

PHA Policy

The PHA will enter into a repayment agreement in accordance with the procedures found in Chapter 16 of this plan.

Long-Term Hardship

If the PHA determines that the financial hardship is long-term, the PHA must exempt the family from the minimum rent requirement for so long as the hardship continues. The exemption will apply from the first of the month following the family's request until the end of the qualifying hardship. When the financial hardship has been determined to be long-term, the family is not required to repay the minimum rent.

PHA Policy

The hardship period ends when any of the following circumstances apply:

- (1) At an interim or annual reexamination, the family's calculated TTP is greater than the minimum rent.
- (2) For hardship conditions based on loss of income, the hardship condition will continue to be recognized until new sources of income are received that are at least equal to the amount lost. For example, if a hardship is approved because a family no longer receives a \$60/month child support payment, the hardship will continue to exist until the family receives at least \$60/month in income from another source or once again begins to receive the child support.
- (3) For hardship conditions based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred.

6-III.C. APPLYING PAYMENT STANDARDS [24 CFR 982.505]

Overview

The PHA's schedule of payment standards is used to calculate housing assistance payments for HCV families. This section covers the application of the PHA's payment standards. The establishment and revision of the PHA's payment standard schedule are covered in Chapter 16.

Payment standard is defined as "the maximum monthly assistance payment for a family assisted in the voucher program (before deducting the total tenant payment by the family)" [24 CFR 982.4(b)].

The payment standard for a family is the lower of (1) the payment standard for the family unit size, which is defined as the appropriate number of bedrooms for the family under the PHA's subsidy standards [24 CFR 982.4(b)], or (2) the payment standard for the size of the dwelling unit rented by the family.

If the PHA has established an exception payment standard for a designated part of an FMR area and a family's unit is located in the exception area, the PHA must use the appropriate payment standard for the exception area.

The PHA is required to pay a monthly housing assistance payment (HAP) for a family that is the lower of (1) the payment standard for the family minus the family's TTP or (2) the gross rent for the family's unit minus the TTP.

If during the term of the HAP contract for a family's unit, the owner lowers the rent, the PHA will recalculate the HAP using the lower of the initial payment standard or the gross rent for the unit [HCV GB, p. 7-8].

Changes in Payment Standards

When the PHA revises its payment standards during the term of the HAP contract for a family's unit, it will apply the new payment standards in accordance with HUD regulations.

Decreases

If the amount on the payment standard schedule is decreased during the term of the HAP contract, the lower payment standard generally will be used beginning at the effective date of the family's second regular reexamination following the effective date of the decrease in the payment standard. The PHA will determine the payment standard for the family as follows:

Step 1: At the first regular reexamination following the decrease in the payment standard, the PHA will determine the payment standard for the family using the lower of the payment standard for the family unit size or the size of the dwelling unit rented by the family.

Step 2: The PHA will compare the payment standard from step 1 to the payment standard last used to calculate the monthly housing assistance payment for the family. The payment standard used by the PHA at the first regular reexamination following the decrease in the payment standard will be the higher of these two payment standards. The PHA will advise the family that the application of the lower payment standard will be deferred until the second regular reexamination following the effective date of the decrease in the payment standard.

Step 3: At the second regular reexamination following the decrease in the payment standard, the lower payment standard will be used to calculate the monthly housing assistance payment for the

family unless the PHA has subsequently increased the payment standard, in which case the payment standard will be determined in accordance with procedures for increases in payment standards described below.

Increases

If the payment standard is increased during the term of the HAP contract, the increased payment standard will be used to calculate the monthly housing assistance payment for the family beginning on the effective date of the family's first regular reexamination on or after the effective date of the increase in the payment standard.

Families requiring or requesting interim reexaminations will not have their HAP payments calculated using the higher payment standard until their next annual reexamination [HCV GB, p. 7-8].

Changes in Family Unit Size

Irrespective of any increase or decrease in the payment standard, if the family unit size increases or decreases during the HAP contract term, the new family unit size must be used to determine the payment standard for the family beginning at the family's first regular reexamination following the change in family unit size.

Reasonable Accommodation

If a family requires a higher payment standard as a reasonable accommodation for a family member who is a person with disabilities, the PHA is allowed to establish a higher payment standard for the family within the basic range.

6-III.D. APPLYING UTILITY ALLOWANCES [24 CFR 982.517]

Overview

A PHA-established utility allowance schedule is used in determining family share and PHA subsidy. The PHA must use the appropriate utility allowance for the size of dwelling unit actually leased by a family rather than the voucher unit size for which the family qualifies using PHA subsidy standards. See Chapter 5 for information on the PHA's subsidy standards.

For policies on establishing and updating utility allowances, see Chapter 16.

Reasonable Accommodation

HCV program regulations require a PHA to approve a utility allowance amount higher than shown on the PHA's schedule if a higher allowance is needed as a reasonable accommodation for a family member with a disability. For example, if a family member with a disability requires such an accommodation, the PHA will approve an allowance for air-conditioning, even if the PHA has determined that an allowance for air-conditioning generally is not needed.

The family must request the higher allowance and provide the PHA with an explanation of the need for the reasonable accommodation and information about the amount of additional allowance required [HCV GB, p. 18-8].

Utility Allowance Revisions

At reexamination, the PHA must use the PHA current utility allowance schedule [24 CFR 982.517(d)(2)].

PHA Policy

Revised utility allowances will be applied to a family's rent and subsidy calculations at the first annual reexamination that is effective after the allowance is adopted.

6-III.E. PRORATED ASSISTANCE FOR MIXED FAMILIES [24 CFR 5.520]

HUD regulations prohibit assistance to ineligible family members. A *mixed family* is one that includes at least one U.S. citizen or eligible immigrant and any number of ineligible family members. The PHA must prorate the assistance provided to a mixed family. The PHA will first determine assistance as if all family members were eligible and then prorate the assistance based upon the percentage of family members that actually are eligible. For example, if the PHA subsidy for a family is calculated at \$500 and two of four family members are ineligible, the PHA subsidy would be reduced to \$250.

EXHIBIT 6-1: ANNUAL INCOME INCLUSIONS

24 CFR 5.609

(a) Annual income means all amounts, monetary or not, which:

(1) Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or

(2) Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and

(3) Which are not specifically excluded in paragraph (c) of this section.

(4) Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

(b) Annual income includes, but is not limited to:

(1) The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services;

(2) The net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family;

(3) Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation is permitted only as authorized in paragraph (b)(2) of this section. Any withdrawal of cash or assets from an investment will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested by the family. Where the family has net family assets in excess of \$5,000, annual income shall include the greater of the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate, as determined by HUD;

(4) The full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts, including a lump-sum amount or prospective monthly amounts for the delayed start of a periodic amount (except as provided in paragraph (c)(14) of this section);

(5) Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation and severance pay (except as provided in paragraph (c)(3) of this section);

(6) Welfare assistance payments.

(i) Welfare assistance payments made under the Temporary Assistance for Needy Families (TANF) program are included in annual income only to the extent such payments:

(A) Qualify as assistance under the TANF program definition at 45 CFR 260.31¹; and

(B) Are not otherwise excluded under paragraph (c) of this section.

(ii) If the welfare assistance payment includes an amount specifically designated for shelter and utilities that is subject to adjustment by the welfare assistance agency in accordance with the actual cost of shelter and utilities, the amount of welfare assistance income to be included as income shall consist of:

(A) The amount of the allowance or grant exclusive of the amount specifically designated for shelter or utilities; plus

(B) The maximum amount that the welfare assistance agency could in fact allow the family for shelter and utilities. If the family's welfare assistance is ratably reduced from the standard of need by applying a percentage, the amount calculated under this paragraph shall be the amount resulting from one application of the percentage.

(7) Periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from organizations or from persons not residing in the dwelling;

(8) All regular pay, special pay and allowances of a member of the Armed Forces (except as provided in paragraph (c)(7) of this section)

(9) For section 8 programs only and as provided in 24 CFR 5.612, any financial assistance, in excess of amounts received for tuition, that an individual receives under the Higher Education Act of 1965 (20 U.S.C. 1001 et seq.), from private sources, or from an institution of higher education (as defined under the Higher Education Act of 1965 (20 U.S.C. 1002)), shall be considered income to that individual, except that financial assistance described in this paragraph is not considered annual income for persons over the age of 23 with dependent children. For purposes of this paragraph, "financial assistance" does not include loan proceeds for the purpose of determining income.

HHS	DEFINITION	OF
"ASSISTANCE"		

45 CFR: GENERAL TEMPORARY ASSISTANCE FOR NEEDY FAMILIES

260.31 What does the term "assistance" mean?

(a)(1) The term "assistance" includes cash, payments, vouchers, and other forms of benefits designed to meet a family's ongoing basic needs (i.e., for food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses).

(2) It includes such benefits even when they are:

(i) Provided in the form of payments by a TANF agency, or other agency on its behalf, to individual recipients; and

(ii) Conditioned on participation in work experience or community service (or any other work activity under 261.30 of this chapter).

¹ Text of 45 CFR 260.31 follows.

(3) Except where excluded under paragraph (b) of this section, it also includes supportive services such as transportation and child care provided to families who are not employed.

(b) [The definition of “assistance”] excludes: (1) Nonrecurring, short-term benefits that:

(i) Are designed to deal with a specific crisis situation or episode of need;

(ii) Are not intended to meet recurrent or ongoing needs; and

(iii) Will not extend beyond four months.

(2) Work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training);

(3) Supportive services such as child care and transportation provided to families who are employed;

(4) Refundable earned income tax credits;

(5) Contributions to, and distributions from, Individual Development Accounts;

(6) Services such as counseling, case management, peer support, child care information and referral, transitional services, job retention, job advancement, and other employment-related services that do not provide basic income support; and

(7) Transportation benefits provided under a Job Access or Reverse Commute project, pursuant to section 404(k) of [the Social Security] Act, to an individual who is not otherwise receiving assistance.

EXHIBIT 6-2: ANNUAL INCOME EXCLUSIONS²

24 CFR 5.609

(c) Annual income does not include the following:

- (1) Income from employment of children (including foster children) under the age of 18 years;
- (2) Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the tenant family, who are unable to live alone);
- (3) Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses (except as provided in paragraph (b)(5) of this section);
- (4) Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member;
- (5) Income of a live-in aide, as defined in Sec. 5.403;
- (6) Subject to paragraph (b)(9) of this section, the full amount of student financial assistance paid directly to the student or to the educational institution;
- (7) The special pay to a family member serving in the Armed Forces who is exposed to hostile fire;
- (8) (i) Amounts received under training programs funded by HUD;
- (ii) Amounts received by a person with a disability that are disregarded for a limited

² FR Notice 11/24/08 makes note of pending revisions to this regulation, namely the exclusion of any deferred disability benefits received in lump-sum or prospective monthly amounts from the Department of Veterans Affairs (VA). At the time of publication, 24 CFR 5.609 had yet to be updated.

time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS);

(iii) Amounts received by a participant in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred (special equipment, clothing, transportation, child care, etc.) and which are made solely to allow participation in a specific program;

(iv) Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time;

(v) Incremental earnings and benefits resulting to any family member from participation in qualifying State or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for the period during which the family member participates in the employment training program;

(9) Temporary, nonrecurring or sporadic income (including gifts);

(10) Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;

(11) Earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of household and spouse);

(12) Adoption assistance payments in excess of \$480 per adopted child;

(13) [Reserved]

(14) Deferred periodic amounts from supplemental security income and social security benefits that are received in a lump sum amount or in prospective monthly amounts.

(15) Amounts received by the family in the form of refunds or rebates under State or local law for property taxes paid on the dwelling unit;

(16) Amounts paid by a State agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home; or

(17) Amounts specifically excluded by any other Federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions set forth in 24 CFR 5.609(c) apply. A notice will be published in the Federal Register and distributed to PHAs and housing owners identifying the benefits that qualify for this exclusion. Updates will be published and distributed when necessary. [See the following chart for a list of benefits that qualify for this exclusion.]

Sources of Income Excluded by Federal Statute from Consideration as Income for Purposes of Determining Eligibility or Benefits
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a) The value of the allotment provided to an eligible household under the Food Stamp Act of 1977 (7 U.S.C. 2017 (b));

b) Payments to Volunteers under the Domestic Volunteer Services Act of 1973 (42 U.S.C. 5044(g), 5058);

c) Payments received under the Alaska Native Claims Settlement Act (43 U.S.C. 1626(c));

d) Income derived from certain sub marginal land of the United States that is held in trust for certain Indian tribes (25 U.S.C. 459e);

e) Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program (42 U.S.C. 8624(f));

f) Payments received under programs funded in whole or in part under the Job Training Partnership Act (29 U.S.C. 1552(b); (effective July 1, 2000, references to Job Training Partnership Act shall be deemed to refer to the corresponding provision of the Workforce Investment Act of 1998 (29 U.S.C. 2931);

g) Income derived from the disposition of funds to the Grand River Band of Ottawa Indians (Pub.L- 94-540, 90 Stat. 2503-04);

h) The first \$2000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U. S. Claims Court, the interests of individual Indians in trust or restricted lands, including the first \$2000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands (25 U.S.C. 1407-1408);

i) Amounts of scholarships funded under title IV of the Higher Education Act of 1965, including awards under federal

work-study program or under the Bureau of Indian Affairs student assistance programs (20 U.S.C. 1087uu);

j) Payments received from programs funded under Title V of the Older Americans Act of 1985 (42 U.S.C. 3056(f));

k) Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in *In Re Agent-product liability litigation*, M.D.L. No. 381 (E.D.N.Y.);

l) Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721);

m) The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990 (42 U.S.C. 9858q);

n) Earned income tax credit (EITC) refund payments received on or after January 1, 1991 (26 U.S.C. 32(j));

o) Payments by the Indian Claims Commission to the Confederated Tribes

and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation (Pub. L. 95-433);

p) Allowances, earnings and payments to AmeriCorps participants under the National and Community Service Act of 1990 (42 U.S.C. 12637(d));

q) Any allowance paid under the provisions of 38 U.S.C. 1805 to a child suffering from spina bifida who is the child of a Vietnam veteran (38 U.S.C. 1805);

r) Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act (42 U.S.C. 10602); and

s) Allowances, earnings and payments to individuals participating in programs under the Workforce Investment Act of 1998 (29 U.S.C. 2931).

EXHIBIT 6-3: TREATMENT OF FAMILY ASSETS

24 CFR 5.603(b) Net Family Assets

(1) Net cash value after deducting reasonable costs that would be incurred in disposing of real property, savings, stocks, bonds, and other forms of capital investment, excluding interests in Indian trust land and excluding equity accounts in HUD homeownership programs. The value of necessary items of personal property such as furniture and automobiles shall be excluded.

(2) In cases where a trust fund has been established and the trust is not revocable by, or under the control of, any member of the family or household, the value of the trust fund will not be considered an asset so long as the fund continues to be held in trust. Any income distributed from the trust fund shall be counted when determining annual income under Sec. 5.609.

(3) In determining net family assets, PHAs or owners, as applicable, shall include the value of any business or family assets disposed of by an applicant or tenant for less than fair market value (including a disposition in trust, but not in a foreclosure or bankruptcy sale) during the two years preceding the date of application for the program or reexamination, as applicable, in excess of the consideration received therefore. In the case of a disposition as part of a separation or divorce settlement, the disposition will not be considered to be for less than fair market value if the applicant or tenant receives important consideration not measurable in dollar terms.

(4) For purposes of determining annual income under Sec. 5.609, the term "net family assets" does not include the value of a home currently being purchased with assistance under part 982, subpart M of this title. This exclusion is limited to the first 10 years after the purchase date of the home.

EXHIBIT 6-4: EARNED INCOME DISALLOWANCE FOR PERSONS WITH DISABILITIES

24 CFR 5.617 Self-sufficiency incentives for persons with disabilities—Disallowance of increase in annual income.

(a) *Applicable programs.* The disallowance of increase in annual income provided by this section is applicable only to the following programs: HOME Investment Partnerships Program (24 CFR part 92); Housing Opportunities for Persons with AIDS (24 CFR part 574); Supportive Housing Program (24 CFR part 583); and the Housing Choice Voucher Program (24 CFR part 982).

(b) *Definitions.* The following definitions apply for purposes of this section.

Disallowance. Exclusion from annual income.

Previously unemployed includes a person with disabilities who has earned, in the twelve months previous to employment, no more than would be received for 10 hours of work per week for 50 weeks at the established minimum wage.

Qualified family. A family residing in housing assisted under one of the programs listed in paragraph (a) of this section or receiving tenant-based rental assistance under one of the programs listed in paragraph (a) of this section.

(1) Whose annual income increases as a result of employment of a family member who is a person with disabilities and who was previously unemployed for one or more years prior to employment;

(2) Whose annual income increases as a result of increased earnings by a family member who is a person with disabilities during participation in any economic self-sufficiency or other job training program; or

(3) Whose annual income increases, as a result of new employment or increased earnings of a family member who is a person with disabilities, during or within six months after receiving assistance, benefits or services under any state program for temporary assistance for needy families funded under Part A of Title IV of the Social Security Act, as determined by the responsible entity in consultation with the local agencies administering temporary assistance for needy families (TANF) and Welfare-to-Work (WTW) programs. The TANF program is not limited to monthly income maintenance, but also includes such benefits and services as one-time payments, wage subsidies and transportation assistance-- provided that the total amount over a six-month period is at least \$500.

(c) *Disallowance of increase in annual income—*

(1) Initial twelve month exclusion. During the cumulative twelve month period beginning on the date a member who is a person with disabilities of a qualified family is first employed or the family first experiences an increase in annual income attributable to employment, the responsible entity must exclude from annual income (as defined in the regulations governing the applicable program listed in paragraph (a) of this section) of a qualified family any increase in income of the family member who is a person with disabilities as a result of employment over prior income of that family member.

(2) Second twelve month exclusion and phase-in. During the second cumulative twelve month period after the date a member who is a person with disabilities of a qualified family is first employed or the family first experiences an increase in annual income attributable to employment, the responsible entity must exclude from annual income of a qualified family fifty percent of any increase in income of such family member as a result of employment over income of that family member prior to the beginning of such employment.

(3) Maximum four year disallowance. The disallowance of increased income of an individual family member who is a person with disabilities as provided in paragraph (c)(1) or (c)(2) is limited to a lifetime 48 month period. The disallowance only applies for a maximum of twelve months for disallowance under paragraph (c)(1) and a maximum of twelve months for disallowance under paragraph (c)(2), during the 48 month period starting from the initial exclusion under paragraph (c)(1) of this section.

(d) Inapplicability to admission. The disallowance of increases in income as a result of employment of persons with disabilities under this section does not apply for purposes of admission to the program (including the determination of income eligibility or any income targeting that may be applicable)

EXHIBIT 6-5: THE EFFECT OF WELFARE BENEFIT REDUCTION

24 CFR 5.615**Public housing program and Section 8 tenant-based assistance program: How welfare benefit reduction affects family income.**

(a) Applicability. This section applies to covered families who reside in public housing (part 960 of this title) or receive Section 8 tenant-based assistance (part 982 of this title).

(b) Definitions. The following definitions apply for purposes of this section:

Covered families. Families who receive welfare assistance or other public assistance benefits ("welfare benefits") from a State or other public agency ("welfare agency") under a program for which Federal, State, or local law requires that a member of the family must participate in an economic self-sufficiency program as a condition for such assistance.

Economic self-sufficiency program. See definition at Sec. 5.603.

Imputed welfare income. The amount of annual income not actually received by a family, as a result of a specified welfare benefit reduction, that is nonetheless included in the family's annual income for purposes of determining rent.

Specified welfare benefit reduction.

(1) A reduction of welfare benefits by the welfare agency, in whole or in part, for a family member, as determined by the welfare agency, because of fraud by a family member in connection with the welfare program; or because of welfare agency sanction against a family member for noncompliance with a welfare agency requirement to participate in an economic self-sufficiency program.

(2) "Specified welfare benefit reduction" does not include a reduction or termination of welfare benefits by the welfare agency:

(i) at expiration of a lifetime or other time limit on the payment of welfare benefits;

(ii) because a family member is not able to obtain employment, even though the family member has complied with welfare agency economic self-sufficiency or work activities requirements; or

(iii) because a family member has not complied with other welfare agency requirements.

(c) Imputed welfare income.

(1) A family's annual income includes the amount of imputed welfare income (because of a specified welfare benefits reduction, as specified in notice to the PHA by the welfare agency), plus the total amount of other annual income as determined in accordance with Sec. 5.609.

(2) At the request of the PHA, the welfare agency will inform the PHA in writing of the amount and term of any specified welfare benefit reduction for a family member, and the reason for such reduction, and will also inform the PHA of any subsequent changes in the term or amount of such specified welfare benefit reduction. The PHA will use this information to determine the amount of imputed welfare income for a family.

(3) A family's annual income includes imputed welfare income in family annual income, as determined at the PHA's interim or regular reexamination of family income and composition, during the term of the welfare benefits reduction (as specified in information provided to the PHA by the welfare agency).

(4) The amount of the imputed welfare income is offset by the amount of additional income a family receives that commences after the time the sanction was imposed. When such additional income from other sources is at least equal to the imputed

(5) The PHA may not include imputed welfare income in annual income if the family was not an assisted resident at the time of sanction.

(d) Review of PHA decision.

(1) Public housing. If a public housing tenant claims that the PHA has not correctly calculated the amount of imputed welfare income in accordance with HUD requirements, and if the PHA denies the family's request to modify such amount, the PHA shall give the tenant written notice of such denial, with a brief explanation of the basis for the PHA determination of the amount of imputed welfare income. The PHA notice shall also state that if the tenant does not agree with the PHA determination, the tenant may request a grievance hearing in accordance with part 966, subpart B of this title to review the PHA determination. The tenant is not required to pay an escrow deposit pursuant to Sec. 966.55(e) for the portion of tenant rent attributable to the imputed welfare income in order to obtain a grievance hearing on the PHA determination.

(2) Section 8 participant. A participant in the Section 8 tenant-based assistance program may request an informal hearing, in accordance with Sec. 982.555 of this title, to review the PHA determination of the amount of imputed welfare income that must be included in the family's annual income in accordance with this section. If the family claims that such amount is not correctly calculated in accordance with HUD requirements, and if the PHA denies the family's request to modify such amount, the PHA shall give the family written notice of

such denial, with a brief explanation of the basis for the PHA determination of the amount of imputed welfare income. Such notice shall also state that if the family does not agree with the PHA determination, the family may request an informal hearing on the determination under the PHA hearing procedure.

(e) PHA relation with welfare agency.

(1) The PHA must ask welfare agencies to inform the PHA of any specified welfare benefits reduction for a family member, the reason for such reduction, the term of any such reduction, and any subsequent welfare agency determination affecting the amount or term of a specified welfare benefits reduction. If the welfare agency determines a specified welfare benefits reduction for a family member, and gives the PHA written notice of such reduction, the family's annual incomes shall include the imputed welfare income because of the specified welfare benefits reduction.

(2) The PHA is responsible for determining the amount of imputed welfare income that is included in the family's annual income as a result of a specified welfare benefits reduction as determined by the welfare agency, and specified in the notice by the welfare agency to the PHA. However, the PHA is not responsible for determining whether a reduction of welfare benefits by the welfare agency was correctly determined by the welfare agency in accordance with welfare program requirements and procedures, nor for providing the opportunity for review or hearing on such welfare agency determinations.

(3) Such welfare agency determinations are the responsibility of the welfare agency, and the family may seek appeal of such determinations through the welfare agency's normal due process procedures. The PHA shall be entitled to rely on the welfare agency notice to the PHA of the welfare agency's

determination of a specified welfare benefits reduction.

Chapter 7

VERIFICATION

[24 CFR 982.516, 24 CFR 982.551, 24 CFR 5.230, Notice PIH 2010-19]

INTRODUCTION

The PHA must verify all information that is used to establish the family's eligibility and level of assistance and is required to obtain the family's consent to collect the information. Applicants and program participants must cooperate with the verification process as a condition of receiving assistance. The PHA must not pass on the cost of verification to the family.

The PHA will follow the verification guidance provided by HUD in Notice PIH 2010-19 and any subsequent guidance issued by HUD. This chapter summarizes those requirements and provides supplementary PHA policies.

Part I describes the general verification process. More detailed requirements related to individual factors are provided in subsequent parts including family information (Part II), income and assets (Part III), and mandatory deductions (Part IV).

Verification policies, rules and procedures will be modified as needed to accommodate persons with disabilities. All information obtained through the verification process will be handled in accordance with the records management policies of the PHA.

PART I

GENERAL VERIFICATION REQUIREMENTS

7-I.A. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 982.516 AND 982.551, 24 CFR 5.230]

The family must supply any information that the PHA or HUD determines is necessary to the administration of the program and must consent to PHA verification of that information [24 CFR 982.551].

Consent Forms

It is required that all adult applicants and participants sign form HUD-9886, Authorization for Release of Information. The purpose of form HUD-9886 is to facilitate automated data collection and computer matching from specific sources and provides the family's consent only for the specific purposes listed on the form. HUD and the PHA may collect information from State Wage Information Collection Agencies (SWICAs) and current and former employers of adult family members. Only HUD is authorized to collect information directly from the Internal Revenue Service (IRS) and the Social Security Administration (SSA). Adult family members must sign other consent forms as needed to collect information relevant to the family's eligibility and level of assistance.

Penalties for Failing to Consent [24 CFR 5.232]

If any family member who is required to sign a consent form fails to do so, the PHA will deny admission to applicants and terminate assistance of participants. The family may request an informal review (applicants) or informal hearing (participants) in accordance with PHA procedures.

7-I.B. OVERVIEW OF VERIFICATION REQUIREMENTS

HUD's Verification Hierarchy [Notice PIH 2010-19]

HUD authorizes the PHA to use six methods to verify family information and specifies the circumstances in which each method will be used. In general HUD requires the PHA to use the most reliable form of verification that is available and to document the reasons when the PHA uses a lesser form of verification.

PHA Policy

In order of priority, the forms of verification that the PHA will use are:

- Up-front Income Verification (UIV) using HUD's Enterprise Income Verification (EIV) system
- Up-front Income Verification (UIV) using a non-HUD system
- Written Third-Party Verification (may be provided by applicant or participant)
- Written Third-party Verification Form
- Oral Third-party Verification
- Self-Certification

Each of the verification methods is discussed in subsequent sections below.

Requirements for Acceptable Documents

PHA Policy

Any documents used for verification must be the original (not photocopies) and generally must be dated within 60 days of the date they are provided to the PHA. The documents must not be damaged, altered or in any way illegible.

Print-outs from Web pages are considered original documents.

The PHA staff member who views the original document must make a photocopy, annotate the copy with the name of the person who provided the document and the date the original was viewed, and sign the copy.

Any family self-certifications must be made in a format acceptable to the PHA and must be signed in the presence of a PHA representative or PHA notary public.

File Documentation

The PHA must document in the file how the figures used in income and rent calculations were determined. All verification attempts, information obtained, and decisions reached during the verification process will be recorded in the family's file in sufficient detail to demonstrate that the PHA has followed all of the verification policies set forth in this plan. The record should be sufficient to enable a staff member or HUD reviewer to understand the process followed and conclusions reached.

PHA Policy

The PHA will document, in the family file, the following:

Reported family annual income

Value of assets

Expenses related to deductions from annual income

Other factors influencing the adjusted income or income-based rent determination

When the PHA is unable to obtain 3rd party verification, the PHA will document in the family file the reason that third-party verification was not available [24 CFR 960.259(c)(1); Notice PIH 2010-19].

7-I.C. UP-FRONT INCOME VERIFICATION (UIV)

Up-front income verification (UIV) refers to the PHA's use of the verification tools available from independent sources that maintain computerized information about earnings and benefits. UIV will be used to the extent that these systems are available to the PHA.

There may be legitimate differences between the information provided by the family and UIV-generated information. If the family disputes the accuracy of UIV data, no adverse action can be taken until the PHA has independently verified the UIV information and the family has been granted an opportunity to contest any adverse findings through the informal review/hearing process of the PHA.

See Chapter 6 for the PHA's policy on the use of UIV/EIV to project annual income.

Upfront Income Verification Using HUD's Enterprise Income Verification (EIV) System (Mandatory)

HUD's EIV system contains data showing earned income, unemployment benefits, social security benefits, and SSI benefits for participant families. HUD requires the PHA to use the EIV system in its entirety. The following policies apply to the use of HUD's EIV system.

EIV Income Reports

The data shown on income reports is updated quarterly. Data may be between 3 and 6 months old at the time reports are generated.

PHA Policy

The PHA will obtain income reports for annual reexaminations on a monthly basis. Reports will be generated as part of the regular reexamination process.

Income reports will be compared to family-provided information as part of the annual reexamination process. Income reports may be used in the calculation of annual income, as described in Chapter 6-I.C. Income reports may also be used to meet the regulatory requirement for third party verification, as described above. Policies for resolving discrepancies between income reports and family-provided information will be resolved as described in Chapter 6-I.C. and in this chapter.

Income reports will be used in interim reexaminations to identify any discrepancies between reported income and income shown in the EIV system, and as necessary to verify and calculate earned income, unemployment benefits, Social Security and/or SSI benefits. EIV will also be used to verify that families claiming zero income are not receiving income from any of these sources.

Income reports will be retained in participant files with the applicable annual or interim reexamination documents.

When the PHA determines through income reports and third-party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 14, Program Integrity.

EIV Discrepancy Reports

The EIV discrepancy report is a tool for identifying families who may have concealed or under-reported income. Data in the discrepancy report represents income for past reporting periods and may be between 6 months and 30 months old at the time reports are generated.

Families who have not concealed or under-reported income may appear on the discrepancy report in some circumstances, such as loss of a job or addition of new family members.

Income discrepancies may be identified through use of the EIV “Income Discrepancy Report” or by review of the discrepancy tab for the individual family.

PHA Policy

The PHA will generate the Income Discrepancy Report at least once every 6 months.

When the PHA determines that a participant appearing on the Income Discrepancy Report has not concealed or under-reported income, the participant’s name will be placed on a list of “false positive” reviews. To avoid multiple reviews in this situation, participants appearing on this list will be eliminated from discrepancy processing until a subsequent interim or annual reexamination has been completed.

The PHA will review the EIV discrepancy tab during processing of annual and interim reexaminations.

When it appears that a family may have concealed or under-reported income, the PHA will request written third-party verification of the income in question.

When the PHA determines through file review and third-party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 14, Program Integrity.

EIV Identity Verification

The EIV system verifies tenant identities against SSA records. These records are compared to PIC data for a match on social security number, name, and date of birth.

PHAs are required to use EIV's *Identity Verification Report* on a monthly basis to improve the availability of income information in EIV [Notice PIH 2010-3].

When identity verification for a participant fails, a message will be displayed within the EIV system and no income information will be displayed.

PHA Policy

The PHA will identify participants whose identity verification has failed by reviewing EIV's *Identity Verification Report* on a monthly basis.

The PHA will attempt to resolve PIC/SSA discrepancies by obtaining appropriate documentation from the participant. When the PHA determines that discrepancies exist due to PHA errors such as spelling errors or incorrect birth dates, the errors will be corrected promptly.

Upfront Income Verification Using Non-HUD Systems (Optional)

In addition to mandatory use of the EIV system, HUD encourages PHAs to utilize other upfront verification sources.

PHA Policy

The PHA will inform all applicants and participants of its use of the following UIV resources during the admission and reexamination process:

Using Up-Front Income Verification (UIV) to Calculate Income

HUD strongly recommends the use of up-front income verification. UIV is “the verification of income, before or during a family reexamination, through an independent source that systematically and uniformly maintains income information in computerized form for a large number of individuals” [PIH Notice 2004-01 Verification Guidance (“VG”), p. 7].

HUD allows PHAs to use UIV information in conjunction with family-provided documents to anticipate income [UIV]. SFHA procedures for determining annual income will include the use of UIV methods approved by HUD. If the UIV information is not available, SFHA will use with family-provided documents dated within the last 60 days of SFHA interview date.

SFHA will follow “HUD Guidelines for Projecting Annual Income When Up-Front Income Verification (UIV) Data Is Available” in handling differences between UIV and family-provided income data. The guidelines depend on whether a difference is substantial or not. HUD defines *substantial difference* as a difference of \$200 or more per month.

No Substantial Difference. If UIV information for a particular income source differs from the information provided by a family by less than \$200 per month, SFHA will follow these guidelines:

If the UIV figure is less than the family’s figure, SFHA will use the family’s information.

If the UIV figure is more than the family’s figure, SFHA will use the UIV data unless the family provides documentation of a change in circumstances to explain the discrepancy (e.g., a reduction in work hours). Upon receipt of acceptable family-provided documentation of a change in circumstances, SFHA will use the family-provided information.

Substantial Difference. If UIV information for a particular income source differs from the information provided by a family by \$200 or more per month, SFHA will follow these guidelines: SFHA will request written third-party verification from the discrepant income source in accordance with 24 CFR 5.236(b)(3)(i).

When SFHA cannot readily anticipate income (e.g., in cases of seasonal employment, unstable working hours, or suspected fraud), SFHA will review historical income data for patterns of employment, paid benefits, and receipt of other income.

SFHA will analyze all UIV, third-party, and family-provided data and attempt to resolve the income discrepancy.

SFHA will use the most current verified income data and, if appropriate, historical income data to calculate anticipated annual income.

7-I.D. THIRD-PARTY WRITTEN AND ORAL VERIFICATION

HUD's current verification hierarchy defines two types of written third-party verification. The more preferable form, "written third-party verification," consists of an original document generated by a third-party source, which may be received directly from a third-party source or provided to the PHA by the family. If written third-party verification is not available, the PHA must attempt to obtain a "written third-party verification form." This is a standardized form used to collect information from a third party.

Written Third-Party Verification [Notice PIH 2010-19]

Written third-party verification documents must be original and authentic and may be supplied by the family or received from a third-party source.

Examples of acceptable tenant-provided documents include, but are not limited to: pay stubs, payroll summary reports, employer notice or letters of hire and termination, SSA benefit verification letters, bank statements, child support payment stubs, welfare benefit letters and/or printouts, and unemployment monetary benefit notices.

The PHA is required to obtain, at minimum, two current and consecutive pay stubs for determining annual income from wages.

The PHA may reject documentation provided by the family if the document is not an original, if the document appears to be forged, or if the document is altered, mutilated, or illegible.

PHA Policy

Third-party documents provided by the family must be dated within 60 days of the PHA request date.

If the PHA determines that third-party documents provided by the family are not acceptable, the PHA will explain the reason to the family and request additional documentation.

As verification of earned income, the PHA will request pay stubs covering the 60-day period prior to the PHA's request.

Written Third-Party Verification Form

When upfront verification is not available and the family is unable to provide written third-party documents, the PHA must request a written third-party verification form. HUD's position is that this traditional third-party verification method presents administrative burdens and risks which may be reduced through the use of family-provided third-party documents.

A written third-party verification form is mandatory when there is an unreported source of income or a substantial difference in reported income (\$2400 annually or more) and there is no UIV or tenant-provided documentation to support the income discrepancy.

PHAs may mail, fax, or e-mail third-party written verification form requests to third-party sources.

PHA Policy

The PHA will send third-party verification forms directly to the third party.

Third-party verification forms will be sent when third-party verification documents are unavailable or are rejected by the PHA.

Oral Third-Party Verification [Notice PIH 2010-19]

For third-party oral verification, PHAs contact sources, identified by UIV techniques or by the family, by telephone or in person.

Oral third-party verification is mandatory if neither form of written third-party verification is available.

Third-party oral verification may be used when requests for written third-party verification forms have not been returned within a reasonable time—e.g., 10 business days.

PHAs should document in the file the date and time of the telephone call or visit, the name of the person contacted, the telephone number, as well as the information confirmed.

PHA Policy

In collecting third-party oral verification, PHA staff will record in the family's file the name and title of the person contacted, the date and time of the conversation (or attempt), the telephone number used, and the facts provided.

When any source responds verbally to the initial written request for verification the PHA will accept the verbal response as oral verification but will also request that the source complete and return any verification forms that were provided.

When Third-Party Verification is Not Required [Notice PIH 2010-19]

Third-party verification may not be available in all situations. HUD has acknowledged that it may not be cost-effective or reasonable to obtain third-party verification of income, assets, or expenses when these items would have a minimal impact on the family's total tenant payment.

PHA Policy

If the family cannot provide original documents, the PHA will pay the service charge required to obtain third-party verification, unless it is not cost effective in which case a self-certification will be acceptable as the only means of verification. The cost of verification will not be passed on to the family.

The cost of postage and envelopes to obtain third-party verification of income, assets, and expenses is not an unreasonable cost [VG, p. 18].

Primary Documents

Third-party verification is not required when legal documents are the primary source, such as a birth certificate or other legal documentation of birth.

Imputed Assets

HUD permits PHAs to accept a self-certification from a family as verification of assets disposed of for less than fair market value [HCV GB, p. 5-28].

PHA Policy

The PHA will accept a self-certification from a family as verification of assets disposed of for less than fair market value.

7-I.E. SELF-CERTIFICATION

Self-certification, or "tenant declaration," is used as a last resort when the PHA is unable to obtain third-party verification.

When the PHA relies on a tenant declaration for verification of income, assets, or expenses, the family's file must be documented to explain why third-party verification was not available.

PHA Policy

When information cannot be verified by a third party or by review of documents, family members will be required to submit self-certifications attesting to the accuracy of the information they have provided to the PHA.

The PHA may require a family to certify that a family member does not receive a particular type of income or benefit.

The self-certification must be made in a format acceptable to the PHA and must be signed by the family member whose information or status is being verified. All self-certifications must be signed in the presence of a PHA representative or PHA notary public.

PART II

VERIFYING FAMILY INFORMATION

7-II.A. VERIFICATION OF LEGAL IDENTITY

PHA Policy

The PHA will require families to furnish verification of legal identity for each household member.

Verification of Legal Identity for Adults	Verification of Legal Identity for Children
Certificate of birth, naturalization papers	Certificate of birth
Church issued baptismal certificate	Adoption papers
Current, valid driver's license or Department of Motor Vehicles identification card	Custody agreement
U.S. military discharge (DD 214)	Health and Human Services ID
U.S. passport	School records
Employer identification card	

If a document submitted by a family is illegible or otherwise questionable, more than one of these documents may be required.

If none of these documents can be provided and at the PHA's discretion, a third party who knows the person may attest to the person's identity. The certification must be provided in a format acceptable to the PHA and be signed in the presence of a PHA representative or PHA notary public.

Legal identity will be verified on an as needed basis.

7-II.B. SOCIAL SECURITY NUMBERS [24 CFR 5.216, Notice PIH 2012-10]

The family must provide documentation of a valid social security number (SSN) for each member of the household, with the exception of individuals who do not contend eligible immigration status. Exemptions also include, existing program participants who were at least 62 years of age as of January 31, 2010, and had not previously disclosed an SSN.

Note that an individual who previously declared to have eligible immigration status may not change his or her declaration for the purpose of avoiding compliance with the SSN disclosure and documentation requirements or penalties associated with noncompliance with these requirements. Nor may the head of household opt to remove a household member from the family composition for this purpose.

The SFHA must accept the following documentation as acceptable evidence of the social security number:

An original SSN card issued by the Social Security Administration (SSA)

An original SSA-issued document, which contains the name and SSN of the individual

An original document issued by a federal, state, or local government agency, which contains the name and SSN of the individual.

The PHA may only reject documentation of an SSN provided by an applicant or participant if the document is not an original document, if the original document has been altered, mutilated, or is not legible, or if the document appears to be forged.

PHA Policy

The PHA will explain to the applicant or participant the reasons the document is not acceptable and request that the individual obtain and submit acceptable documentation of the SSN to the PHA within 90 days.

In the case of Moderate Rehabilitation Single Room Occupancy (SRO) individuals, the required documentation must be provided within 90 calendar days from the date of admission into the program. The PHA must grant one additional 90-day extension if it determines that the applicant's failure to comply was due to circumstances that were beyond the applicant's control and could not have been reasonably foreseen.

PHA Policy

The PHA will grant one additional 90-day extension if needed for reasons beyond the participant's control such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency. If the individual fails to comply with SSN disclosure and documentation requirements upon expiration of the provided time period, the PHA will terminate the individual's assistance.

When the participant requests to add a new household member who is at least 6 years of age, or who is under the age of 6 and has an SSN, the participant must provide the complete and accurate SSN assigned to each new member at the time of reexamination or recertification, in addition to the documentation required to verify it. The PHA may not add the new household member until such documentation is provided.

When a participant requests to add a new household member who is under the age of 6 and has not been assigned an SSN, the participant must provide the SSN assigned to each new child and the required documentation within 90 calendar days of the child being added to the household. A 90-day extension will be granted if the PHA determines that the participant's failure to comply was due to unforeseen circumstances and was outside of the participant's control. During the period the PHA is awaiting documentation of the SSN, the child will be counted as part of the assisted household.

PHA Policy

The PHA will grant one additional 90-day extension if needed for reasons beyond the participant's control such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency.

Social security numbers must be verified only once during continuously-assisted occupancy.

PHA Policy

The PHA will verify each disclosed SSN by:

Obtaining documentation from applicants and participants that is acceptable as evidence of social security numbers

Making a copy of the original documentation submitted, returning it to the individual, and retaining a copy in the file folder

Once the individual's verification status is classified as "verified," the SFHA may, at its discretion, remove and destroy copies of documentation accepted as evidence of social security numbers. The retention of the EIV Summary Report or Income Report is adequate documentation of an individual's SSN.

PHA Policy

Once an individual's status is classified as "verified" in HUD's EIV system, the PHA will remove and destroy copies of documentation accepted as evidence of social security numbers.

7-II.C. DOCUMENTATION OF AGE

A birth certificate or other official record of birth is the preferred form of age verification for all family members. For elderly family members an original document that provides evidence of the receipt of social security retirement benefits is acceptable.

PHA Policy

If an official record of birth or evidence of social security retirement benefits cannot be provided, the PHA will require the family to submit other documents that support the reported age of the family member (e.g., school records, driver's license if birth year is recorded) and to provide a self-certification.

Age must be verified only once during continuously-assisted occupancy.

7-II.D. FAMILY RELATIONSHIPS

Applicants and program participants are required to identify the relationship of each household member to the head of household. Definitions of the primary household relationships are provided in the Eligibility chapter.

PHA Policy

Family relationships are verified only to the extent necessary to determine a family's eligibility and level of assistance. Certification by the head of household normally is sufficient verification of family relationships.

Marriage

PHA Policy

Certification by the head of household is normally sufficient verification. If the PHA has reasonable doubts about a marital relationship, the PHA will require the family to document the marriage.

A marriage certificate generally is required to verify that a couple is married.

In the case of a common law marriage, the couple must demonstrate that they hold themselves to be married (e.g., by telling the community they are married, calling each other husband and wife, using the same last name, filing joint income tax returns).

Separation or Divorce

PHA Policy

Certification by the head of household is normally sufficient verification. If the PHA has reasonable doubts about a separation or divorce, the PHA will require the family to document the divorce, or separation.

A certified copy of a divorce decree, signed by a court officer, is required to document that a couple is divorced.

A copy of a court-ordered maintenance or other court record is required to document a separation.

If no court document is available, documentation from a community-based agency will be accepted.

Absence of Adult Member

PHA Policy

If an adult member who was formerly a member of the household is reported to be permanently absent, the family must provide evidence to support that the person is no longer a member of the family (e.g., documentation of another address at which the person resides such as a lease or utility bill).

Foster Children and Foster Adults

PHA Policy

Third-party verification from the state or local government agency responsible for the placement of the individual with the family is required.

7-II.E. VERIFICATION OF STUDENT STATUS

General Requirements

PHA Policy

The PHA requires families to provide information about the student status of all students who are 18 years of age or older. This information will be verified only if:

The family reports full-time student status for an adult other than the head, spouse, or co head.

The family reports child care expenses to enable a family member to further his or her education.

The family includes a student enrolled in an *institution of higher education*.

Restrictions on Assistance to Students Enrolled in Institutions of Higher Education

This section applies only to students who are seeking assistance on their own, separately from their parents. It does not apply to students residing with parents who are seeking or receiving HCV assistance.

PHA Policy

In accordance with the verification hierarchy described in Section 7-1.B, the PHA will determine whether the student is exempt from the restrictions in 24 CFR 5.612 by verifying any one of the following exemption criteria:

The student is enrolled at an educational institution that does not meet the definition of *institution of higher education* in the Higher Education Act of 1965 (see Section Exhibit 3-2).

The student is at least 24 years old.

The student is a veteran, as defined in Section 3-II.E.

The student is married.

The student has at least one dependent child, as defined in Section 3-II.E.

The student is a person with disabilities, as defined in Section 3-II.E, and was receiving assistance prior to November 30, 2005.

If the PHA cannot verify at least one of these exemption criteria, the PHA will conclude that the student is subject to the restrictions on assistance at 24 CFR 5.612. In addition to verifying the student's income eligibility, the PHA will then proceed to verify either the student's parents' income eligibility (see Section 7-III.J) or the student's independence from his/her parents (see below).

Independent Student

PHA Policy

The PHA will verify a student's independence from his/her parents to determine that the student's parents' income is not relevant for determining the student's eligibility by doing all of the following:

Either reviewing and verifying previous address information to determine whether the student has established a household separate from his/her parents for at least one year or reviewing and verifying documentation relevant to determining whether the student meets the U.S. Department of Education's definition of *independent student* (see Section 3-II.E)

Reviewing prior year income tax returns to verify whether a parent has claimed the student as a dependent

Requesting and obtaining written certification directly from the student's parents identifying the amount of support they will be providing to the student, even if the amount of support is \$0.

7-II.F. DOCUMENTATION OF DISABILITY

The PHA must verify the existence of a disability in order to allow certain income disallowances and deductions from income. The PHA is not permitted to inquire about the nature or extent of a person's disability [24 CFR 100.202(c)]. The PHA may not inquire about a person's diagnosis or details of treatment for a disability or medical condition. If the PHA receives a verification document that provides such information, the PHA will not place this information in the tenant file. Under no circumstances will the PHA request a participant's medical record(s). For more information on health care privacy laws, see the Department of Health and Human Services' website at www.os.dhhs.gov.

The above cited regulation does not prohibit the following inquiries, provided these inquiries are made of all applicants, whether or not they are persons with disabilities [VG, p. 24]:

Inquiry into an applicant's ability to meet the requirements of ownership or tenancy

Inquiry to determine whether an applicant is qualified for a dwelling available only to persons with disabilities or to persons with a particular type of disability

Inquiry to determine whether an applicant for a dwelling is qualified for a priority available to persons with disabilities or to persons with a particular type of disability

Inquiring whether an applicant for a dwelling is a current illegal abuser or addict of a controlled substance

Inquiring whether an applicant has been convicted of the illegal manufacture or distribution of a controlled substance

Family Members Receiving SSA Disability Benefits

Verification of the receipt of disability benefits from the Social Security Administration (SSA) is sufficient verification of disability for the purpose of qualifying for waiting list preferences (if applicable) or certain income disallowances and deductions [VG, p. 23].

PHA Policy

For family members claiming disability who receive disability benefits from the SSA, the PHA will attempt to obtain information about disability benefits through the HUD Enterprise Income Verification (EIV) system. If documentation from HUD's EIV System is not available, the PHA will request a current (dated within the last 60 days) SSA benefit verification letter from each family member claiming disability status. If the family is unable to provide the document(s), the PHA will ask the family to request a benefit verification letter by either calling SSA at 1-800-772-1213, or by requesting it from www.ssa.gov. Once the applicant or participant receives the benefit verification letter they will be required to provide it to the PHA.

Family Members Not Receiving SSA Disability Benefits

Receipt of veteran's disability benefits, worker's compensation, or other non-SSA benefits based on the individual's claimed disability are not sufficient verification that the individual meets HUD's definition of disability in 24 CFR 5.403.

PHA Policy

For family members claiming disability who do not receive disability benefits from the SSA, a knowledgeable professional must provide third-party verification that the family member meets the HUD definition of disability. See the Eligibility chapter for the HUD definition of disability. The knowledgeable professional will verify whether the family member does or does not meet the HUD definition.

7-II.G. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS [24 CFR 5.508]

Overview

Housing assistance is not available to persons who are not citizens, nationals, or eligible immigrants. Prorated assistance is provided for "mixed families" containing both eligible and ineligible persons. A detailed discussion of eligibility requirements is in the Eligibility chapter. This verifications chapter discusses HUD and PHA verification requirements related to citizenship status.

The family must provide a certification that identifies each family member as a U.S. citizen, a U.S. national, an eligible noncitizen or an ineligible noncitizen and submit the documents discussed below for each family member. Once eligibility to receive assistance has been verified for an individual it need not be collected or verified again during continuously-assisted occupancy. [24 CFR 5.508(g)(5)]

U.S. Citizens and Nationals

HUD requires a declaration for each family member who claims to be a U.S. citizen or national. The declaration must be signed personally by any family member 18 or older and by a guardian for minors.

The PHA may request verification of the declaration by requiring presentation of a birth certificate, United States passport or other appropriate documentation.

PHA Policy

Family members who claim U.S. citizenship or national status will not be required to provide additional documentation unless the PHA receives information indicating that an individual's declaration may not be accurate.

Eligible Immigrants

Documents Required

All family members claiming eligible immigration status must declare their status in the same manner as U.S. citizens and nationals.

The documentation required for eligible noncitizens varies depending upon factors such as the date the person entered the U.S., the conditions under which eligible immigration status has been granted, age, and the date on which the family began receiving HUD-funded assistance. Exhibit 7-2 at the end of this chapter summarizes documents family members must provide.

PHA Verification [HCV GB, pp. 5-3 and 5-7]

For family members age 62 or older who claim to be eligible immigrants, proof of age is required in the manner described in 7-II.C. of this plan. No further verification of eligible immigration status is required.

For family members under the age of 62 who claim to be eligible immigrants, the PHA must verify immigration status with the United States Citizenship and Immigration Services (USCIS).

The PHA will follow all USCIS protocols for verification of eligible immigration status.

7-II.H. VERIFICATION OF PREFERENCE STATUS

The PHA must verify any preferences claimed by an applicant.

PHA Policy

The PHA will offer a preference to any family that has been terminated from its HCV program due to insufficient program funding. The PHA will verify this preference using the PHA's termination records.

PART III

VERIFYING INCOME AND ASSETS

Chapter 6, Part I of this plan describes in detail the types of income that are included and excluded and how assets and income from assets are handled. Any assets and income reported by the family must be verified. This part provides PHA policies that supplement the general verification procedures specified in Part I of this chapter.

7-III.A. EARNED INCOME

Tips

PHA Policy

Unless tip income is included in a family member's W-2 by the employer, persons who work in industries where tips are standard will be required to sign a certified estimate of tips received for the prior year and tips anticipated to be received in the coming year.

7-III.B. BUSINESS AND SELF EMPLOYMENT INCOME

PHA Policy

Business owners and self-employed persons will be required to provide:

An audited financial statement for the previous fiscal year if an audit was conducted. If an audit was not conducted, a statement of income and expenses must be submitted and the business owner or self-employed person must certify to its accuracy.

All schedules completed for filing federal and local taxes in the preceding year.

If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules.

The PHA will provide a format for any person who is unable to provide such a statement to record income and expenses for the coming year. The business owner/self-employed person will be required to submit the information requested and to certify to its accuracy at all future reexaminations.

At any reexamination the PHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.

If a family member has been self-employed less than three (3) months, the PHA will accept the family member's certified estimate of income and schedule an interim reexamination in three (3) months. If the family member has been self-employed for three (3) to twelve (12) months the PHA will require the family to provide documentation of income and expenses for this period and use that information to project income.

7-III.C. PERIODIC PAYMENTS AND PAYMENTS IN LIEU OF EARNINGS

Social Security/SSI Benefits

PHA Policy

To verify the SS/SSI benefits of applicants, the PHA will request a current (dated within the last 60 days) SSA benefit verification letter from each family member that receives social security benefits. If the family is unable to provide the document(s), the PHA will help the applicant request a benefit verification letter from SSA's Web site at www.socialsecurity.gov or ask the family to request one by calling SSA at 1-800-772-1213. Once the applicant has received the benefit verification letter they will be required to provide it to the PHA.

To verify the SS/SSI benefits of participants, the PHA will obtain information about social security/SSI benefits through the HUD EIV System, and confirm with the participant(s) that the current listed benefit amount is correct. If the participant disputes the EIV-reported benefit amount, or if benefit information is not available in HUD systems, the PHA will request a current SSA benefit verification letter from each family member that receives social security benefits. If the family is unable to provide the document(s) the PHA will help the participant request a benefit verification letter from SSA's Web site at www.socialsecurity.gov or ask the family to request one by calling SSA at 1-800-772-1213. Once the participant has received the benefit verification letter they will be required to provide it to the PHA.

7-III.D. ALIMONY OR CHILD SUPPORT

PHA Policy

The way the PHA will seek verification for alimony and child support differs depending on whether the family declares that it receives regular payments.

If the family declares that it *receives regular payments*, verification will be sought in the following order.

Copy of the receipts and/or payment stubs for the 60 days prior to PHA request

Third-party verification form from the state or local child support enforcement agency

Third-party verification form from the person paying the support

Family's self-certification of amount received and of the likelihood of support payments being received in the future, or that support payments are not being received.

If the family declares that it *receives irregular or no payments*, in addition to the verification process listed above, the family must provide evidence that it has taken all reasonable efforts to collect amounts due. This may include:

A statement from any agency responsible for enforcing payment that shows the family has requested enforcement and is cooperating with all enforcement efforts

If the family has made independent efforts at collection, a written statement from the attorney or other collection entity that has assisted the family in these efforts

Note: Families are not required to undertake independent enforcement action.

7-III.E. ASSETS AND INCOME FROM ASSETS

Assets Disposed of for Less than Fair Market Value

The family must certify whether any assets have been disposed of for less than fair market value in the preceding two years. The PHA needs to verify only those certifications that warrant documentation [HCV GB, p. 5-28].

PHA Policy

The PHA will verify the value of assets disposed of only if:

The PHA does not already have a reasonable estimation of its value from previously collected information, or

The amount reported by the family in the certification appears obviously in error.

Example 1: An elderly participant reported a \$10,000 certificate of deposit at the last annual reexamination and the PHA verified this amount. Now the person reports that she has given this \$10,000 to her son. The PHA has a reasonable estimate of the value of the asset; therefore, re-verification of the value of the asset is not necessary.

Example 2: A family member has disposed of its 1/4 share of real property located in a desirable area and has valued her share at approximately 5,000. Based upon market conditions, this declaration does not seem realistic. Therefore, the PHA will verify the value of this asset.

7-III.F. NET INCOME FROM RENTAL PROPERTY

PHA Policy

The family must provide:

A current executed lease for the property that shows the rental amount or certification from the current tenant

A self-certification from the family members engaged in the rental of property providing an estimate of expenses for the coming year and the most recent IRS Form 1040 with Schedule E (Rental Income). If schedule E was not prepared, the PHA will require the family members involved in the rental of property to provide a self-certification of income and expenses for the previous year and may request documentation to support the statement including: tax statements, insurance invoices, bills for reasonable maintenance and utilities, and bank statements or amortization schedules showing monthly interest expense.

7-III.G. RETIREMENT ACCOUNTS

PHA Policy

The PHA will accept written third-party documents supplied by the family as evidence of the status of retirement accounts.

The type of original document that will be accepted depends upon the family member's retirement status.

Before retirement, the PHA will accept an original document from the entity holding the account with a date that shows it is the most recently scheduled statement for the account but in no case earlier than 6 months from the effective date of the examination.

Upon retirement, the PHA will accept an original document from the entity holding the account that reflects any distributions of the account balance, any lump sums taken and any regular payments.

After retirement, the PHA will accept an original document from the entity holding the account dated no earlier than 12 months before that reflects any distributions of the account balance, any lump sums taken and any regular payments.

7-III.H. INCOME FROM EXCLUDED SOURCES

A detailed discussion of excluded income is provided in Chapter 6, Part I.

The PHA must obtain verification for income exclusions only if, without verification, the PHA would not be able to determine whether the income is to be excluded. For example: If a family's 16 year old has a job at a fast food restaurant, the PHA will confirm that PHA records verify the child's age but will not require third-party verification of the amount earned. However, if a family claims the earned income disallowance for a source of income, both the source and the income must be verified.

PHA Policy

The PHA will reconcile differences in amounts reported by the third party and the family only when the excluded amount is used to calculate the family share (as is the case with the earned income disallowance). In all other cases, the PHA will report the amount to be excluded as indicated on documents provided by the family.

7-III.I. ZERO ANNUAL INCOME STATUS

PHA Policy

The PHA will check UIV sources and/or request information from third-party sources to verify that certain forms of income such as unemployment benefits, TANF, SSI, etc., are not being received by families claiming to have zero annual income.

7-III.J. STUDENT FINANCIAL ASSISTANCE

Any financial assistance, in excess of amounts received for tuition, that a person attending an institution of higher education receives under the Higher Education Act of 1965, from private sources, or from an institution of higher education must be considered income unless the student is over the age of 23 with dependent children or is residing with parents who are seeking or receiving HCV assistance [24 CFR 5.609(b)(9) and FR 4/10/06].

For students over the age of 23 with dependent children or students residing with parents who are seeking or receiving HCV assistance, the full amount of student financial assistance is excluded from annual income [24 CFR 5.609(c)(6)]. The full amount of student financial assistance is also excluded for students attending schools that do not qualify as institutions of higher education (as defined in Exhibit 3-2). Excluded amounts are verified only if, without verification, the PHA would not be able to determine whether or to what extent the income is to be excluded (see Section 7-III.H).

PHA Policy

For a student subject to having a portion of his/her student financial assistance included in annual income in accordance with 24 CFR 5.609(b)(9), the PHA will request written third-party verification of both the source and the amount. Family-provided documents from the educational institution attended by the student will be requested, as well as documents generated by any other person or entity providing such assistance, as reported by the student.

In addition, the PHA will request written verification of the student's tuition amount.

If the PHA is unable to obtain third-party written verification of the requested information, the PHA will pursue other forms of verification following the verification hierarchy in Section 7-I.B.

7-III.K. PARENTAL INCOME OF STUDENTS SUBJECT TO ELIGIBILITY RESTRICTIONS

If a student enrolled at an institution of higher education is under the age of 24, is not a veteran, is not married, does not have a dependent child, and is not a person with disabilities receiving HCV assistance as of November 30, 2005, the income of the student's parents must be considered when determining income eligibility, unless the student is determined independent from his or her parents in accordance with PHA policy [24 CFR 5.612 and FR 4/10/06, p. 18146].

This provision does not apply to students residing with parents who are seeking or receiving HCV assistance. It is limited to students who are seeking or receiving assistance on their own, separately from their parents.

PHA Policy

If the PHA is required to determine the income eligibility of a student's parents, the PHA will request an income declaration and certification of income from the appropriate parent(s) (as determined in Section 3-II.E). The PHA will send the request directly to the parents, who will be required to certify to their income under penalty of perjury. The parents will be required to submit the information directly to the PHA. The required information must be submitted (postmarked) within 10 business days of the date of the PHA's request or within any extended timeframe approved by the PHA.

The PHA reserves the right to request and review supporting documentation at any time if it questions the declaration or certification. Supporting documentation may include, but is not limited to, Internal Revenue Service (IRS) tax returns, consecutive and original pay stubs, bank statements, pension benefit statements, benefit award letters, and other official and authentic documents from a federal, state, or local agency.

PART IV

VERIFYING MANDATORY DEDUCTIONS

7-IV.A. DEPENDENT AND ELDERLY/DISABLED HOUSEHOLD DEDUCTIONS

The dependent and elderly/disabled family deductions require only that the PHA verify that the family members identified as dependents or elderly/disabled persons meet the statutory definitions. No further verifications are required.

Dependent Deduction

See Chapter 6 (6-II.B.) for a full discussion of this deduction. The PHA must verify that:

- Any person under the age of 18 for whom the dependent deduction is claimed is not the head, spouse, or co-head of the family and is not a foster child
- Any person age 18 or older for whom the dependent deduction is claimed is not a foster adult or live-in aide, and is a person with a disability or a full time student

Elderly/Disabled Family Deduction

See Eligibility chapter for a definition of elderly and disabled families and Chapter 6 (6-II.C.) for a discussion of the deduction. The PHA must verify that the head, spouse, or co head is 62 years of age or older or a person with disabilities.

7-IV.B. MEDICAL EXPENSE DEDUCTION

Policies related to medical expenses are found in 6-II.D. The amount of the deduction will be verified following the standard verification procedures described in Part I.

Amount of Expense

PHA Policy

Medical expenses will be verified through:

Written third-party documents provided by the family, such as pharmacy printouts or receipts.

The PHA will make a best effort to determine what expenses from the past are likely to continue to occur in the future. The PHA will also accept evidence of monthly payments or total payments that will be due for medical expenses during the upcoming 12 months.

Written third-party verification forms, if the family is unable to provide acceptable documentation.

If third-party or document review is not possible, written family certification as to costs anticipated to be incurred during the upcoming 12 months.

In addition, the PHA must verify that:

- The household is eligible for the deduction.
- The costs to be deducted are qualified medical expenses.
- The expenses are not paid for or reimbursed by any other source.
- Costs incurred in past years are counted only once.

Eligible Household

The medical expense deduction is permitted only for households in which the head, spouse, or co head is at least 62, or a person with disabilities. The PHA must verify that the family meets the definition of an elderly or disabled family provided in the Eligibility chapter and as described in Chapter 7 (7-IV.A.) of this plan.

Qualified Expenses

To be eligible for the medical expenses deduction, the costs must qualify as medical expenses. See Chapter 6 (6-II.D.) for the PHA's policy on what counts as a medical expense.

Unreimbursed Expenses

To be eligible for the medical expenses deduction, the costs must not be reimbursed by another source.

PHA Policy

The family will be required to certify that the medical expenses are not paid or reimbursed to the family from any source.

Expenses Incurred in Past Years

PHA Policy

When anticipated costs are related to on-going payment of medical bills incurred in past years, the PHA will verify:

The anticipated repayment schedule

The amounts paid in the past, and

Whether the amounts to be repaid have been deducted from the family's annual income in past years

7-IV.C. DISABILITY ASSISTANCE EXPENSES

Policies related to disability assistance expenses are found in 6-II.E. The amount of the deduction will be verified following the standard verification procedures described in Part I.

Amount of Expense

Attendant Care

PHA Policy

The PHA will accept written third-party documents provided by the family.

If family-provided documents are not available, the PHA will provide a third-party verification form directly to the care provider requesting the needed information.

Expenses for attendant care will be verified through:

Written third-party documents provided by the family, such as receipts or cancelled checks.

Third-party verification form signed by the provider, if family-provided documents are not available.

If third-party verification is not possible, written family certification as to costs anticipated to be incurred for the upcoming 12 months.

Auxiliary Apparatus

PHA Policy

Expenses for auxiliary apparatus will be verified through:

Written third-party documents provided by the family, such as billing statements for purchase of auxiliary apparatus, or other evidence of monthly payments or total payments that will be due for the apparatus during the upcoming 12 months.

Third-party verification form signed by the provider, if family-provided documents are not available.

If third-party verification is not possible, written family certification of estimated apparatus costs for the upcoming 12 months.

In addition, the PHA must verify that:

- The family member for whom the expense is incurred is a person with disabilities (as described in 7-II.F above).
- The expense permits a family member, or members, to work (as described in 6-II.E.).
- The expense is not reimbursed from another source (as described in 6-II.E.).

Family Member is a Person with Disabilities

To be eligible for the disability assistance expense deduction, the costs must be incurred for attendant care or auxiliary apparatus expense associated with a person with disabilities. The PHA will verify that the expense is incurred for a person with disabilities (See 7-II.F.).

Family Member(s) Permitted to Work

The PHA must verify that the expenses claimed actually enable a family member, or members, (including the person with disabilities) to work.

PHA Policy

The PHA will request third-party verification from a rehabilitation agency or knowledgeable medical professional indicating that the person with disabilities requires attendant care or an auxiliary apparatus to be employed, or that the attendant care or auxiliary apparatus enables another family member, or members, to work (See 6-II.E.). This documentation may be provided by the family.

If third-party verification has been attempted and is either unavailable or proves unsuccessful, the family must certify that the disability assistance expense frees a family member, or members (possibly including the family member receiving the assistance), to work.

Unreimbursed Expenses

To be eligible for the disability expenses deduction, the costs must not be reimbursed by another source.

PHA Policy

The family will be required to certify that attendant care or auxiliary apparatus expenses are not paid by or reimbursed to the family from any source.

7-IV.D. CHILD CARE EXPENSES

Policies related to child care expenses are found in Chapter 6 (6-II.F). The amount of the deduction will be verified following the standard verification procedures described in Part I of this chapter. In addition, the PHA must verify that:

- The child is eligible for care.
- The costs claimed are not reimbursed.
- The costs enable a family member to pursue an eligible activity.
- The costs are for an allowable type of child care.
- The costs are reasonable.

Eligible Child

To be eligible for the child care deduction, the costs must be incurred for the care of a child under the age of 13. The PHA will verify that the child being cared for (including foster children) is under the age of 13 (See 7-II.C.).

Unreimbursed Expense

To be eligible for the child care deduction, the costs must not be reimbursed by another source.

PHA Policy

The family will be required to certify that the child care expenses are not paid by or reimbursed to the family from any source.

Pursuing an Eligible Activity

The PHA must verify that the family member(s) that the family has identified as being enabled to seek work, pursue education, or be gainfully employed, are actually pursuing those activities.

PHA Policy

Information to be Gathered

The PHA will verify information about how the schedule for the claimed activity relates to the hours of care provided, the time required for transportation, the time required for study (for students), the relationship of the family member(s) to the child, and any special needs of the child that might help determine which family member is enabled to pursue an eligible activity.

Seeking Work

Whenever possible the PHA will use documentation from a state or local agency that monitors work-related requirements (e.g., welfare or unemployment). In such cases the PHA will request family-provided verification from the agency of the member's job seeking efforts to date, and require the family to submit to the PHA any reports provided to the other agency.

In the event third-party verification is not available, the PHA will provide the family with a form on which the family member must record job search efforts. The PHA will review this information at each subsequent reexamination for which this deduction is claimed.

Furthering Education

The PHA will request third-party documentation to verify that the person permitted to further his or her education by the child care is enrolled and provide information about the timing of classes for which the person is registered. The documentation may be provided by the family.

Gainful Employment

The PHA will seek third-party verification of the work schedule of the person who is permitted to work by the child care. In cases in which two or more family members could be permitted to work, the work schedules for all relevant family members may be verified. The documentation may be provided by the family.

Allowable Type of Child Care

The type of care to be provided is determined by the family, but must fall within certain guidelines, as discussed in Chapter 6.

PHA Policy

The PHA will verify that the type of child care selected by the family is allowable, as described in Chapter 6 (6-II.F).

The PHA will verify that the fees paid to the child care provider cover only child care costs (e.g., no housekeeping services or personal services) and are paid only for the care of an eligible child (e.g., prorate costs if some of the care is provided for ineligible family members).

The PHA will verify that the child care provider is not an assisted family member. Verification will be made through the head of household's declaration of family members who are expected to reside in the unit.

Reasonableness of Expenses

Only reasonable child care costs can be deducted.

PHA Policy

The actual costs the family incurs will be compared with the PHA's established standards of reasonableness for the type of care in the locality to ensure that the costs are reasonable.

If the family presents a justification for costs that exceed typical costs in the area, the PHA will request additional documentation, as required, to support a determination that the higher cost is appropriate.

EXHIBIT 7-1: SUMMARY OF DOCUMENTATION REQUIREMENTS FOR NONCITIZENS [HCV GB, pp. 5-9 and 5-10]

<ul style="list-style-type: none"> • All noncitizens claiming eligible status must sign a declaration of eligible immigrant status on a form acceptable to the PHA. • Except for persons 62 or older, all noncitizens must sign a verification consent form • Additional documents are required based upon the person's status. 	
<p>Elderly Noncitizens</p> <ul style="list-style-type: none"> • A person 62 years of age or older who claims eligible immigration status also must provide proof of age such as birth certificate, passport, or documents showing receipt of SS old-age benefits. 	
<p>All other Noncitizens</p> <ul style="list-style-type: none"> • Noncitizens that claim eligible immigration status also must present the applicable USCIS document. Acceptable USCIS documents are listed below. 	
<ul style="list-style-type: none"> • Form I-551 Alien Registration Receipt Card (for permanent resident aliens) • Form I-94 Arrival-Departure Record annotated with one of the following: <ul style="list-style-type: none"> • “Admitted as a Refugee Pursuant to Section 207” • “Section 208” or “Asylum” • “Section 243(h)” or “Deportation stayed by Attorney General” • “Paroled Pursuant to Section 221 (d)(5) of the USCIS” 	<ul style="list-style-type: none"> • Form I-94 Arrival-Departure Record with no annotation accompanied by: <ul style="list-style-type: none"> • A final court decision granting asylum (but only if no appeal is taken); • A letter from a USCIS asylum officer granting asylum (if application is filed on or after 10/1/90) or from a USCIS district director granting asylum (application filed before 10/1/90); • A court decision granting withholding of deportation; or • A letter from an asylum officer granting withholding or deportation (if application filed on or after 10/1/90).
<ul style="list-style-type: none"> • Form I-688 Temporary Resident Card annotated “Section 245A” or Section 210”. 	<ul style="list-style-type: none"> • Form I-688B Employment Authorization Card annotated “Provision of Law 274a. 12(11)” or “Provision of Law 274a.12”.

- A receipt issued by the USCIS indicating that an application for issuance of a replacement document in one of the above listed categories has been made and the applicant's entitlement to the document has been verified; or
- Other acceptable evidence. If other documents are determined by the USCIS to constitute acceptable evidence of eligible immigration status, they will be announced by notice published in the *Federal Register*

Chapter 8

HOUSING QUALITY STANDARDS AND RENT REASONABLENESS DETERMINATIONS

[24 CFR 982 Subpart I and 24 CFR 982.507]

INTRODUCTION

HUD requires that all units occupied by families receiving Housing Choice Voucher (HCV) assistance meet HUD's Housing Quality Standards (HQS) and permits the PHA to establish additional requirements. The use of the term "HQS" in this plan refers to the combination of both HUD and PHA-established requirements. HQS inspections are required before the Housing Assistance Payments (HAP) Contract is signed and at least annually during the term of the contract.

HUD also requires PHAs to determine that units rented by families assisted under the HCV program have rents that are reasonable when compared to comparable unassisted units in the market area.

This chapter explains HUD and PHA requirements related to housing quality and rent reasonableness as follows:

Part I. Physical Standards. This part discusses the physical standards required of units occupied by HCV-assisted families and identifies decisions about the acceptability of the unit that may be made by the family based upon the family's preference. It also identifies life-threatening conditions that must be addressed on an expedited basis.

Part II. The Inspection Process. This part describes the types of inspections the PHA will make and the steps that will be taken when units do not meet HQS.

Part III. Rent Reasonableness Determinations. This part discusses the policies the PHA will use to make rent reasonableness determinations.

Special HQS requirements for homeownership, manufactured homes, and other special housing types are discussed in Chapter 15 to the extent that they apply in this jurisdiction.

PART I
PHYSICAL STANDARDS

8-I.A. GENERAL HUD REQUIREMENTS

HUD Performance and Acceptability Standards

HUD's performance and acceptability standards for HCV-assisted housing are provided in 24 CFR 982.401. These standards cover the following areas:

- Sanitary facilities
- Food preparation and refuse disposal
- Space and Security
- Thermal Environment
- Illumination and electricity
- Structure and materials
- Interior Air Quality
- Water Supply
- Lead-based paint
- Access
- Site and neighborhood
- Sanitary condition
- Smoke Detectors

A summary of HUD performance criteria is provided in Attachment 8-1. Additional guidance on these requirements is found in the following HUD resources:

- Housing Choice Voucher Guidebook, Chapter 10.
- HUD Housing Inspection Manual for Section 8 Housing
- HUD Inspection Form, form HUD-52580 (3/01) and Inspection Checklist, form HUD-52580-A (9/00)
- HUD Notice 2003-31, Accessibility Notice: Section 504 of the Rehabilitation Act of 1973; the Americans with Disabilities Act of 1990; the Architectural Barriers Act of 1968 and the Fair Housing Act of 1988.

Tenant Preference Items

HUD requires the PHA to enforce minimum HQS but also requires that certain judgments about acceptability be left to the family. For example, the PHA must ensure that the unit contains the required sanitary facilities, but the family decides whether the cosmetic condition of the facilities is acceptable. Attachment 8-2 summarizes those items that are considered tenant preferences.

Modifications to Provide Accessibility

Under the Fair Housing Act of 1988 an owner must not refuse the request of a family that contains a person with a disability to make necessary and reasonable modifications to the unit. Such modifications are at the family's expense. The owner may require restoration of the unit to its original condition if the modification would interfere with the owner or next occupant's full enjoyment of the premises. The owner may not increase a customarily required security deposit. However, the landlord may negotiate a restoration agreement that requires the family to restore the unit and, if necessary to ensure the likelihood of restoration, may require the tenant to pay a reasonable amount into an interest bearing escrow account over a reasonable period of time. The interest in any such account accrues to the benefit of the tenant. The owner may also require reasonable assurances that the quality of the work will be acceptable and that any required building permits will be obtained.[24 CFR 100.203; Notice 2003-31].

Modifications to units to provide access for a person with a disability must meet all applicable HQS requirements and conform to the design, construction, or alteration of facilities contained in the UFAS and the ADA Accessibility Guidelines (ADAAG) [28 CFR 35.151(c) and Notice 2003-31] See Chapter 2 of this plan for additional information on reasonable accommodations for persons with disabilities.

PHA Policy

Any owner that intends to negotiate a restoration agreement or require an escrow account must submit the agreement(s) to the PHA for review.

8-I.B. ADDITIONAL LOCAL REQUIREMENTS

The PHA may impose additional quality standards as long as the additional criteria are not likely to adversely affect the health or safety of participant families or severely restrict housing choice. HUD approval is required if more stringent standards are imposed. HUD approval is not required if the PHA additions are clarifications of HUD's acceptability criteria or performance standards [24 CFR 982.401(a)(4)].

Thermal Environment [HCV GB p.10-7]

The PHA must define a “healthy living environment” for the local climate. This may be done by establishing a temperature that the heating system must be capable of maintaining, that is appropriate for the local climate.

PHA Policy

The heating system must be capable of maintaining an interior temperature of 65 degrees Fahrenheit between October 1 and May 1.

Clarifications of HUD Requirements

PHA Policy

As permitted by HUD, the PHA has adopted the following specific requirements that elaborate on HUD standards.

Walls

In areas where plaster or drywall is sagging, severely cracked, or otherwise damaged, it must be repaired or replaced.

Windows

Window sashes must be in good condition, solid and intact, and properly fitted to the window frame. Damaged or deteriorated sashes must be replaced.

Windows must be weather-stripped as needed to ensure a weather-tight seal.

Window screens must be in good condition (applies only if screens are present).

Doors

All exterior doors must be weather-tight to avoid any air or water infiltration, be lockable, have no holes, have all trim intact, and have a threshold.

All interior doors must have no holes, have all trim intact, and be openable without the use of a key.

Floors

All wood floors must be sanded to a smooth surface and sealed. Any loose or warped boards must be resecured and made level. If they cannot be leveled, they must be replaced.

All floors must be in a finished state. Raw wood or unsealed concrete is not permitted.

All floors should have some type of base shoe, trim, or sealing for a "finished look." Vinyl base shoe is permitted.

Sinks

All sinks and commode water lines must have shut off valves, unless faucets are wall mounted.

All worn or cracked toilet seats and tank lids must be replaced and toilet tank lid must fit properly.

All sinks must have functioning stoppers.

Security

If window security bars or security screens are present on emergency exit windows, they must be equipped with a quick release system. The owner is responsible for ensuring that the family is instructed on the use of the quick release system.

8-I.C. LIFE THREATENING CONDITIONS [24 CFR 982.404(a)]

HUD requires the PHA to define life threatening conditions and to notify the owner or the family (whichever is responsible) of the corrections required. The responsible party must correct life threatening conditions within 24 hours of PHA notification.

PHA Policy

The following are considered life threatening conditions:

Any condition that jeopardizes the security of the unit

Major plumbing leaks or flooding, waterlogged ceiling or floor in imminent danger of falling

Natural or LPgas or fuel oil leaks

Any electrical problem or condition that could result in shock or fire

Absence of a working heating system when outside temperature is below 60 degrees Fahrenheit.

Utilities not in service, including no running hot water

Conditions that present the imminent possibility of injury

Obstacles that prevent safe entrance or exit from the unit

Absence of a functioning toilet in the unit

Inoperable smoke detectors

If an owner fails to correct life threatening conditions as required by the PHA, the housing assistance payment will be abated and the HAP contract will be terminated. See 8-II-G.

If a family fails to correct a family caused life threatening condition as required by the PHA, the PHA may terminate the family's assistance. See 8-II.H.

The owner will be required to repair an inoperable smoke detector unless the PHA determines that the family has intentionally disconnected it (by removing batteries or other means). In this case, the family will be required to repair the smoke detector within 24 hours.

8-I.D. OWNER AND FAMILY RESPONSIBILITIES [24 CFR 982.404]**Family Responsibilities**

The family is responsible for correcting the following HQS deficiencies:

- Tenant-paid utilities not in service
- Failure to provide or maintain family-supplied appliances
- Damage to the unit or premises caused by a household member or guest beyond normal wear and tear. "Normal wear and tear" is defined as items which could not be charged against the tenant's security deposit under state law or court practice.

Owner Responsibilities

The owner is responsible for all HQS violations not listed as a family responsibility above, even if the violation is caused by the family's living habits (e.g., vermin infestation). However, if the family's actions constitute a serious or repeated lease violation the owner may take legal action to evict the family.

PHA Policy

If an owner has multiple units and only one meter, the owner will pay all of the utility cost(s) and will NOT be allowed to place the cost(s) of the utilities on the tenant.

Owners are permitted to keep storage within the unit under the following conditions:

- The storage area must be separate from the tenant's living unit. A garage is an acceptable storage area. Stored items are not to occupy a sleeping room within the unit.
- The storage area must be explicitly documented in the lease agreement and the owner must pay any utilities in the storage area in which he/she has access.

8-I.E. SPECIAL REQUIREMENTS FOR CHILDREN WITH ENVIRONMENTAL INTERVENTION BLOOD LEAD LEVEL [24 CFR 35.1225]

If a PHA is notified by a public health department or other medical health care provider, or verifies information from a source other than a public health department or medical health care provider, that a child of less than 6 years of age, living in an HCV-assisted unit has been identified as having an environmental intervention blood lead level, the PHA must complete a risk assessment of the dwelling unit. The risk assessment must be completed in accordance with program requirements, and the result of the risk assessment must be immediately provided to the owner of the dwelling unit. In cases where the public health department has already completed an evaluation of the unit, this information must be provided to the owner.

Within 30 days after receiving the risk assessment report from the PHA, or the evaluation from the public health department, the owner is required to complete the reduction of identified lead-based paint hazards in accordance with the lead-based paint regulations [24 CFR 35.1325 and 35.1330]. If the owner does not complete the “hazard reduction” as required, the dwelling unit is in violation of HQS and the PHA will take action in accordance with Section 8-II.G.

PHA reporting requirements, and data collection and record keeping responsibilities related to children with an environmental intervention blood lead level are discussed in Chapter 16.

8-I.F. VIOLATION OF HQS SPACE STANDARDS [24 CFR 982.403]

If the PHA determines that a unit does not meet the HQS space standards because of an increase in family size or a change in family composition, the PHA must issue the family a new voucher, and the family and PHA must try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, the PHA must terminate the HAP contract in accordance with its terms.

PART II

THE INSPECTION PROCESS

8-II.A. OVERVIEW [24 CFR 982.405]

Types of Inspections

The PHA conducts the following types of inspections as needed. Each type of inspection is discussed in the paragraphs that follow.

- *Initial Inspections.* The PHA conducts initial inspections in response to a request from the family to approve a unit for participation in the HCV program. The unit must pass the HQS inspection before the effective date of the HAP Contract.
- *Annual Inspections.* HUD requires the PHA to inspect each unit under lease at least annually to confirm that the unit still meets HQS. The inspection may be conducted in conjunction with the family's annual reexamination but also may be conducted separately.
- *Special Inspections.* A special inspection may be requested by the owner, the family, or a third party as a result of problems identified with a unit between annual inspections.
- *Quality Control Inspections.* HUD requires that a sample of units be re-inspected by a supervisor or other qualified individual to ensure that HQS are being enforced correctly and uniformly by all inspectors.

Inspection of PHA-owned Units [24 CFR 982.352(b)]

The PHA must obtain the services of an independent entity to perform all HQS inspections in cases where an HCV family is receiving assistance in a PHA-owned unit. A PHA-owned unit is defined as a unit that is owned by the PHA that administers the assistance under the consolidated ACC (including a unit owned by an entity substantially controlled by the PHA). The independent agency must communicate the results of each inspection to the family and the PHA. The independent agency must be approved by HUD, and may be the unit of general local government for the PHA jurisdiction (unless the PHA is itself the unit of general local government or an agency of such government).

Inspection Costs

The PHA may not charge the family or owner for unit inspections [24 CFR 982.405(e)]. In the case of inspections of PHA-owned units, the PHA may compensate the independent agency from ongoing administrative fee for inspections performed. The PHA and the independent agency may not charge the family any fee or charge for the inspection [24 CFR.982.352(b)].

Notice and Scheduling

The family must allow the PHA to inspect the unit at reasonable times with reasonable notice [24 CFR 982.551(d)].

PHA Policy

Both the family and the owner will be given reasonable notice of all inspections. Except in the case of a life threatening emergency, reasonable notice is considered to be not less than 48 hours. Inspections may be scheduled between 8:00 a.m. and 7:00 p.m. Generally inspections will be conducted on business days only. In the case of a life threatening emergency, the PHA will give as much notice as possible, given the nature of the emergency.

Owner and Family Inspection Attendance

HUD permits the PHA to set policy regarding family and owner presence at the time of inspection [HCV GB p. 10-27].

PHA Policy

When a family occupies the unit at the time of inspection an adult family member must be present for the inspection. The presence of the owner or the owner's representative is encouraged but is not required.

At initial inspection of a vacant unit, the PHA will inspect the unit in the presence of the owner or owner's representative. The presence of a family representative is permitted, but is not required.

8-II.B. INITIAL HQS INSPECTION [24 CFR 982.401(a)]

Timing of Initial Inspections

HUD requires the unit to pass HQS before the effective date of the lease and HAP Contract. HUD requires PHAs with fewer than 1,250 budgeted units to complete the initial inspection, determine whether the unit satisfies HQS, and notify the owner and the family of the determination within 15 days of submission of the Request for Tenancy Approval (RTA). For PHAs with 1,250 or more budgeted units, to the extent practicable such inspection and determination must be completed within 15 days. The 15-day period is suspended for any period during which the unit is not available for inspection [982.305(b)(2)].

PHA Policy

The PHA will complete the initial inspection, determine whether the unit satisfies HQS, and notify the owner and the family of the determination within ~~15~~ 30 calendar days of submission of the Request for Tenancy Approval (RTA).

Inspection Results and Re-inspections

PHA Policy

If any HQS violations are identified, the owner will be notified of the deficiencies and be given a time frame to correct them. If requested by the owner, the time frame for correcting the deficiencies may be extended by the PHA for good cause. The PHA will re-inspect the unit within 5 business days of the date the owner notifies the PHA that the required corrections have been made.

If the time period for correcting the deficiencies (or any PHA-approved extension) has elapsed, or the unit fails HQS at the time of the re-inspection, the PHA will notify the owner and the family that the unit has been rejected and that the family must search for another unit. The PHA may agree to conduct a second re-inspection, for good cause, at the request of the family and owner.

Following a failed re-inspection, the family may submit a new Request for Tenancy Approval for the unit if the family has not found another unit by the time the owner completes all repairs and the family continues to wish to live in the unit.

Utilities

Generally, at initial lease-up the owner is responsible for demonstrating that all utilities are in working order including those utilities that the family will be responsible for paying.

PHA Policy

If utility service is not available for testing at the time of the initial inspection, the PHA will allow the utilities to be placed in service after the unit has met all other HQS requirements. The PHA will re-inspect the unit to confirm that utilities are operational before the HAP contract is executed by the PHA.

AppliancesPHA Policy

If the family is responsible for supplying the stove and/or refrigerator, the PHA will allow the stove and refrigerator to be placed in the unit after the unit has met all other HQS requirements. The required appliances must be in place before the HAP contract is executed by the PHA. The PHA will execute the HAP contract based upon a certification from the family that the appliances have been installed and are working. A confirmatory inspection will be scheduled within 30 days of HAP contract approval.

8-II.C. ANNUAL HQS INSPECTIONS [24 CFR 982.405(a)]

Scheduling the Inspection

Each unit under HAP contract must have an annual inspection no more than 12 months after the most recent inspection.

PHA Policy

If an adult family member cannot be present on the scheduled date, the family should request that the PHA reschedule the inspection. The PHA and family will agree on a new inspection date that generally should take place within 5 business days of the originally-scheduled date. The PHA may schedule an inspection more than 5 business days after the original date for good cause.

If the family misses the first scheduled appointment without requesting a new inspection date, the PHA will automatically schedule a second inspection. If the family misses two scheduled inspections without PHA approval, the PHA will consider the family to have violated its obligation to make the unit available for inspection. This may result in termination of the family's assistance in accordance with Chapter 12.

8-II.D. SPECIAL INSPECTIONS [HCV GB, p. 10-30]

The PHA will conduct a special inspection if the owner, family, or another source reports HQS violations in the unit.

PHA Policy

During a special inspection, the PHA generally will inspect only those deficiencies that were reported. However, the inspector will record any additional HQS deficiencies that are observed and will require the responsible party to make the necessary repairs.

If the annual inspection has been scheduled or is due within 90 days of the date the special inspection is scheduled the PHA may elect to conduct a full annual inspection.

8-II.E. QUALITY CONTROL INSPECTIONS [24 CFR 982.405(b); HCV GB, p. 10-32]

HUD requires a PHA supervisor or other qualified person to conduct quality control inspections of a sample of units to ensure that each inspector is conducting accurate and complete inspections and that there is consistency in the application of the HQS.

The unit sample must include only units that have been inspected within the preceding 3 months. The selected sample will include (1) each type of inspection (initial, annual, and special), (2) inspections completed by each inspector, and (3) units from a cross-section of neighborhoods.

8-II.F. INSPECTION RESULTS AND REINSPECTIONS FOR UNITS UNDER HAP CONTRACT

Notification of Corrective Actions

The owner and the family will be notified in writing of the results of all inspections. When an inspection identifies HQS failures, the PHA will determine (1) whether or not the failure is a life threatening condition and (2) whether the family or owner is responsible.

PHA Policy

When life threatening conditions are identified, the PHA will immediately notify both parties by telephone, facsimile, or email. The notice will specify who is responsible for correcting the violation. The corrective actions must be taken within 24 hours of the PHA's notice.

When failures that are not life threatening are identified, the PHA will send the owner and the family a written notification of the inspection results within 5 business days of the inspection. The written notice will specify who is responsible for correcting the violation, and the time frame within which the failure must be corrected. Generally not more than 30 days will be allowed for the correction.

The notice of inspection results will inform the owner that if life threatening conditions are not corrected within 24 hours, and non-life threatening conditions are not corrected within the specified time frame (or any PHA-approved extension), the owner's HAP will be abated in accordance with PHA policy (see 8-II.G.). Likewise, in the case of family caused deficiencies, the notice will inform the family that if corrections are not made within the specified time frame (or any PHA-approved extension, if applicable) the family's assistance will be terminated in accordance with PHA policy (see Chapter 12).

Extensions

For conditions that are life-threatening, the PHA cannot grant an extension to the 24 hour corrective action period. For conditions that are not life-threatening, the PHA may grant an exception to the required time frames for correcting the violation, if the PHA determines that an extension is appropriate [24 CFR 982.404].

PHA Policy

Extensions will be granted in cases where the PHA has determined that the owner has made a good faith effort to correct the deficiencies and is unable to for reasons beyond the owner's control. Reasons may include, but are not limited to:

A repair cannot be completed because required parts or services are not available.

A repair cannot be completed because of weather conditions.

A reasonable accommodation is needed because the family includes a person with disabilities.

The length of the extension will be determined on a case by case basis, but will not exceed 60 days, except in the case of delays caused by weather conditions. In the case of weather conditions, extensions may be continued until the weather has improved sufficiently to make repairs possible. The necessary repairs must be made within 15 calendar days, once the weather conditions have subsided.

Re-inspections

PHA Policy

The PHA will conduct a re-inspection immediately following the end of the corrective period, or any PHA approved extension.

The family and owner will be given reasonable notice of the re-inspection appointment. If the deficiencies have not been corrected by the time of the re-inspection, the PHA will send a notice of abatement to the owner, or in the case of family caused violations, a notice of termination to the family, in accordance with PHA policies. If the PHA is unable to gain entry to the unit in order to conduct the scheduled re-inspection, the PHA will consider the family to have violated its obligation to make the unit available for inspection. This may result in termination of the family's assistance in accordance with Chapter 12.

8-II.G. ENFORCING OWNER COMPLIANCE

If the owner fails to maintain the dwelling unit in accordance with HQS, the PHA must take prompt and vigorous action to enforce the owner obligations.

HAP Abatement

If an owner fails to correct HQS deficiencies by the time specified by the PHA, HUD requires the PHA to abate housing assistance payments no later than the first of the month following the specified correction period (including any approved extension) [24 CFR 985.3(f)]. No retroactive payments will be made to the owner for the period of time the rent was abated. Owner rents are not abated as a result of HQS failures that are the family's responsibility.

PHA Policy

The PHA will make all HAP abatements effective the first of the month following the expiration of the PHA specified correction period (including any extension).

The PHA will inspect abated units within 5 business days of the owner's notification that the work has been completed. Payment will resume effective on the day the unit passes inspection.

During any abatement period the family continues to be responsible for its share of the rent. The owner must not seek payment from the family for abated amounts and may not use the abatement as cause for eviction.

HAP Contract Termination

The PHA must decide how long any abatement period will continue before the HAP contract will be terminated. The PHA should not terminate the contract until the family finds another unit, provided the family does so in a reasonable time [HCV GB p. 10-29] and must give the owner reasonable notice of the termination. The PHA will issue a voucher to permit the family to move to another unit as described in Chapter 10.

PHA Policy

The maximum length of time that a HAP may be abated is 90 days. However, if the owner completes corrections and notifies the PHA before the termination date of the HAP contract, the PHA may rescind the termination notice if (1) the family still resides in the unit and wishes to remain in the unit and (2) the unit passes inspection.

Reasonable notice of HAP contract termination by the PHA is 30 days.

8-II.H. ENFORCING FAMILY COMPLIANCE WITH HQS [24 CFR 982.404(b)]

Families are responsible for correcting any HQS violations listed in paragraph 8.I.D. If the family fails to correct a violation within the period allowed by the PHA (and any extensions), the PHA will terminate the family's assistance, according to the policies described in Chapter 12.

If the owner carries out a repair for which the family is responsible under the lease, the owner may bill the family for the cost of the repair.

PART III

RENT REASONABLENESS [24 CFR 982.507]

8-III.A. OVERVIEW

No HAP contract can be approved until the PHA has determined that the rent for the unit is reasonable. The purpose of the rent reasonableness test is to ensure that a fair rent is paid for each unit rented under the HCV program.

HUD regulations define a reasonable rent as one that does not exceed the rent charged for comparable, unassisted units in the same market area. HUD also requires that owners not charge more for assisted units than for comparable units on the premises. This part explains the method used to determine whether a unit's rent is reasonable.

PHA-owned Units [24 CFR 982.352(b)]

In cases where an HCV family is receiving assistance in a PHA-owned unit, the PHA must obtain the services of an independent entity to determine rent reasonableness in accordance with program requirements, and to assist the family in negotiating the contract rent when the family requests assistance. A PHA-owned unit is defined as a unit that is owned by the PHA that administers the assistance under the consolidated ACC (including a unit owned by an entity substantially controlled by the PHA). The independent agency must communicate the results of the rent reasonableness determination to the family and the PHA. The independent agency must be approved by HUD, and may be the unit of general local government for the PHA jurisdiction (unless the PHA is itself the unit of general local government or an agency of such government).

8-III.B. WHEN RENT REASONABLENESS DETERMINATIONS ARE REQUIRED

Owner-initiated Rent Determinations

The PHA must make a rent reasonableness determination at initial occupancy and whenever the owner requests a rent adjustment.

The owner and family first negotiate the rent for a unit. The PHA (or independent agency in the case of PHA-owned units) will assist the family with the negotiations upon request. At initial occupancy the PHA must determine whether the proposed rent is reasonable before a HAP Contract is signed. The owner must not change the rent during the initial lease term. Subsequent requests for rent adjustments must be consistent with the lease between the owner and the family. Rent increases will not be approved unless any failed items identified by the most recent HQS inspection have been corrected.

PHA Policy

After the initial occupancy period, the owner may request a rent adjustment in accordance with the owner's lease. For rent increase requests after initial lease-up, the PHA may request owners to provide information about the rents charged for other units on the premises, if the premises include more than 4 units. In evaluating the proposed rents in comparison to other units on the premises the PHA will consider unit size and length of tenancy in the other units.

The PHA will determine whether the requested increase is reasonable within ~~10 business~~ 30 calendar days of receiving the request from the owner. The owner will be notified of the determination in writing.

All rents adjustments will be effective the first of the month following 60 days after the PHA's receipt of the owner's request or on the date specified by the owner, whichever is later.

PHA- and HUD-Initiated Rent Reasonableness Determinations

HUD requires the PHA to make a determination of rent reasonableness (even if the owner has not requested a change) if there is a 5 percent decrease in the Fair Market Rent that goes into effect at least 60 days before the contract anniversary date. HUD also may direct the PHA to make a determination at any other time. The PHA may decide that a new determination of rent reasonableness is needed at any time.

PHA Policy

In addition to the instances described above, the PHA will make a determination of rent reasonableness at any time after the initial occupancy period if: (1) the PHA determines that the initial rent reasonableness determination was in error or (2) the PHA determines that the information provided by the owner about the unit or other units on the same premises was incorrect.

8-III.C. HOW COMPARABILITY IS ESTABLISHED

Factors to Consider

HUD requires PHAs to take into consideration the factors listed below when determining rent comparability. The PHA may use these factors to make upward or downward adjustments to the rents of comparison units when the units are not identical to the HCV-assisted unit.

- Location and age
- Unit size including the number of rooms and square footage of rooms
- The type of unit including construction type (e.g., single family, duplex, garden, low-rise, high-rise)
- The quality of the units including the quality of the original construction, maintenance and improvements made.
- Amenities, services, and utilities included in the rent

Units that Must Not be Used as Comparables

Comparable units must represent unrestricted market rents. Therefore, units that receive some form of federal, state, or local assistance that imposes rent restrictions cannot be considered comparable units. These include units assisted by HUD through any of the following programs: Section 8 project-based assistance, Section 236 and Section 221(d)(3) Below Market Interest Rate (BMIR) projects, HOME or Community Development Block Grant (CDBG) program-assisted units in which the rents are subsidized; units subsidized through federal, state, or local tax credits; units subsidized by the Department of Agriculture rural housing programs, and units that are rent-controlled by local ordinance.

Note: Notice PIH 2011-46, issued August 17, 2011, provides further guidance on the issue of what constitutes an assisted unit.

Rents Charged for Other Units on the Premises

The Request for Tenancy Approval (HUD-52517) requires owners to provide information, on the form itself, about the rent charged for other unassisted comparable units on the premises if the premises include more than 4 units.

By accepting the PHA payment each month the owner certifies that the rent is not more than the rent charged for comparable unassisted units on the premises. If asked to do so, the owner must give the PHA information regarding rents charged for other units on the premises.

8-III.D. PHA RENT REASONABLENESS METHODOLOGY

How Market Data is Collected

PHA Policy

The PHA will collect and maintain data on market rents in the PHA's jurisdiction. Information sources include newspapers, realtors, market surveys, inquiries of owners and other available sources. The data will be maintained by bedroom size and market areas. Market areas may be defined by zip codes, census tract, neighborhood, and identifiable natural or man-made boundaries. The data will be updated on an ongoing basis and rent information that is more than 12 months old will be eliminated from the database.

How Rents are Determined

PHA Policy

The rent for a unit proposed for HCV assistance will be compared to the rent charged for comparable units in the same market area. The PHA will develop a range of prices for comparable units by bedroom size within defined market areas. Units proposed for HCV assistance will be compared to the units within this rent range. Because units may be similar, but not exactly like the unit proposed for HCV assistance, the PHA may make adjustments to the range of prices to account for these differences.

The adjustment must reflect the local market. Not all differences in units require adjustments (e.g., the presence or absence of a garbage disposal may not affect the rent in some market areas).

Adjustments may vary by unit type (e.g., a second bathroom may be more valuable in a three-bedroom unit than in a two-bedroom).

The adjustment must reflect the rental value of the difference – not its construction costs (e.g., it might cost \$20,000 to put on a new roof, but the new roof might not make any difference in what a tenant would be willing to pay because rental units are presumed to have functioning roofs).

When a comparable project offers rent concessions (e.g., first month rent-free, or reduced rent) reported monthly rents will be adjusted accordingly. For example, if a comparable project reports rents of \$500/month but new tenants receive the first month's rent free, the actual rent for the unit would be calculated as follows: $\$500 \times 11 \text{ months} = 5500/12 \text{ months} = \text{actual monthly rent of } \488 .

The PHA will notify the owner of the rent the PHA can approve based upon its analysis of rents for comparable units. The owner may submit information about other comparable units in the market area. The PHA will confirm the accuracy of the information provided and consider this additional information when making rent determinations. The owner must submit any additional information within 5 business days of the PHA's request for information or the owner's request to submit information.

EXHIBIT 8-1: OVERVIEW OF HUD HOUSING QUALITY STANDARDS

Note: This document provides an overview of HQS. For more detailed information see the following documents:

- 24 CFR 982.401, Housing Quality Standards (HQS)
- Housing Choice Voucher Guidebook, Chapter 10.
- HUD Housing Inspection Manual for Section 8 Housing
- HUD Inspection Form, form HUD-52580 (3/01) and Inspection Checklist, form HUD-52580-A (9/00)

Sanitary Facilities

The dwelling unit must include sanitary facilities within the unit. □The sanitary facilities must be usable in privacy and must be in proper operating condition and adequate for personal cleanliness and disposal of human waste.

Food Preparation and Refuse Disposal

The dwelling unit must have space and equipment suitable for the family to store, prepare, and serve food in a sanitary manner.

Space and Security

The dwelling unit must provide adequate space and security for the family. This includes having at least one bedroom or living/sleeping room for each two persons.

Thermal Environment

The unit must have a safe system for heating the dwelling unit. Air conditioning is not required but if provided must be in proper operating condition. The dwelling unit must not contain unvented room heaters that burn gas, oil, or kerosene. Portable electric room heaters or kitchen stoves with built-in heating units are not acceptable as a primary source of heat for units located in climatic areas where permanent heat systems are required.

Illumination and Electricity

Each room must have adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of occupants. The dwelling unit must have sufficient electrical sources so occupants can use essential electrical appliances. Minimum standards are set for different types of rooms. Once the minimum standards are met, the number, type and location of electrical sources are a matter of tenant preference.

Structure and Materials

The dwelling unit must be structurally sound. Handrails are required when four or more steps (risers) are present, and protective railings are required when porches, balconies, and stoops are thirty inches or more off the ground. The elevator servicing the unit must be working [if there is one]. Manufactured homes must have proper tie-down devices capable of surviving wind loads common to the area.

Interior Air Quality

The dwelling unit must be free of air pollutant levels that threaten the occupants' health. There must be adequate air circulation in the dwelling unit. Bathroom areas must have one openable window or other adequate ventilation. Any sleeping room must have at least one window. If a window was designed to be opened, it must be in proper working order.

Water Supply

The dwelling unit must be served by an approved public or private water supply that is sanitary and free from contamination. Plumbing fixtures and pipes must be free of leaks and threats to health and safety.

Lead-Based Paint

Lead-based paint requirements apply to dwelling units built prior to 1978 that are occupied or can be occupied by families with children under six years of age, excluding zero bedroom dwellings. Owners must:

- Disclose known lead-based paint hazards to prospective tenants before the lease is signed,
- provide all prospective families with "Protect Your Family from Lead in Your Home",
- Stabilize deteriorated painted surfaces and conduct hazard reduction activities when identified by the PHA
- Notify tenants each time such an activity is performed
- Conduct all work in accordance with HUD safe practices
- As part of ongoing maintenance ask each family to report deteriorated paint.

For units occupied by environmental intervention blood lead level (lead poisoned) children under six years of age, a risk assessment must be conducted (paid for by the PHA). If lead hazards are identified during the risk assessment, the owner must complete hazard reduction activities.

See HCV GB p. 10-15 for a detailed description of these requirements. For additional information on lead-based paint requirements see 24 CFR 35, Subparts A, B, M, and R.

Access

Use and maintenance of the unit must be possible without unauthorized use of other private properties. The building must provide an alternate means of exit in case of fire.

PHA Policy

8.1 Access to Unit

“Through another unit” means that access to the unit is only possible

by means of passage through another dwelling unit.

Functioning mail boxes are a requirement and any damaged or missing mail boxes will be a mandatory fail item.

Functioning door bells and call boxes are always required and any damaged or missing door bells or call boxes will be a mandatory fail item.

Site and Neighborhood

The site and neighborhood must be reasonably free from disturbing noises and reverberations, excessive trash or vermin, or other dangers to the health, safety, and general welfare of the occupants.

PHA Policy

The presence of an abandoned car is a mandatory fail item

EXHIBIT 8-1: OVERVIEW OF HUD HOUSING QUALITY STANDARDS Site and Neighborhood: Not previously in policy

Sanitary Condition

The dwelling unit and its equipment must be in sanitary condition and free of vermin and rodent infestation. The unit must have adequate barriers to prevent infestation.

Smoke Detectors

Smoke detectors must be installed in accordance with and meet the requirements of the National Fire Protection Association Standard (NFPA) 74 (or its successor standards). If the dwelling unit is occupied by any person with a hearing impairment, smoke detectors must have an appropriate alarm system as specified in NFPA 74 (or successor standards).

Hazards and Health/Safety

The unit, interior and exterior common areas accessible to the family, the site, and the surrounding neighborhood must be free of hazards to the family's health and safety.

EXHIBIT 8-2: SUMMARY OF TENANT PREFERENCE AREAS RELATED TO HOUSING QUALITY

Note: This document provides an overview of unit and site characteristics and conditions for which the family determines acceptability. For more detailed information see the following documents:

- Housing Choice Voucher Guidebook, Chapter 10.
- HUD Housing Inspection Manual for Section 8 Housing
- HUD Inspection Form, form HUD-52580 (3/01) and Inspection Checklist, form HUD-52580-A (9/00)

Provided the minimum housing quality standards have been met, HUD permits the family to determine whether the unit is acceptable with regard to the following characteristics.

- *Sanitary Facilities.* The family may determine the adequacy of the cosmetic condition and quality of the sanitary facilities, including the size of the lavatory, tub, or shower; the location of the sanitary facilities within the unit; and the adequacy of the water heater.
- *Food Preparation and Refuse Disposal.* The family selects size and type of equipment it finds acceptable. When the family is responsible for supplying cooking appliances, the family may choose to use a microwave oven in place of a conventional oven, stove, or range. When the owner is responsible for providing cooking appliances, the owner may offer a microwave oven in place of an oven, stove, or range only if other subsidized and unsubsidized units on the premises are furnished with microwave ovens only. The adequacy of the amount and type of storage space, the cosmetic conditions of all equipment, and the size and location of the kitchen are all determined by the family.
- *Space and Security.* The family may determine the adequacy of room sizes and room locations. The family is also responsible for deciding the acceptability of the type of door and window locks.
- *Energy conservation items.* The family may determine whether the amount of insulation, presence of absence of storm doors and windows and other energy conservation items are acceptable.
- *Illumination and Electricity.* The family may determine whether the location and the number of outlets and fixtures (over and above those required to meet HQS standards) are acceptable or if the amount of electrical service is adequate for the use of appliances, computers, or stereo equipment.

- (6) *Structure and Materials.* Families may determine whether minor defects, such as lack of paint, or worn flooring or carpeting will affect the livability of the unit.
- (7) *Indoor Air.* Families may determine whether window and door screens, filters, fans, or other devices for proper ventilation are adequate to meet the family's needs. However, if screens are present they must be in good condition.
- (8) *Sanitary Conditions.* The family determines whether the sanitary conditions in the unit, including minor infestations, are acceptable.
- (9) *Neighborhood conditions.* Families may determine whether neighborhood conditions such as the presence of drug activity, commercial enterprises, and convenience to shopping will affect the livability of the unit.

Families have no discretion with respect to lead-based paint standards and smoke detectors.

Chapter 9

GENERAL LEASING POLICIES

INTRODUCTION

Chapter 9 covers the lease-up process from the family's submission of a Request for Tenancy Approval to execution of the HAP contract.

In order for the PHA to assist a family in a particular dwelling unit, or execute a Housing Assistance Payments (HAP) contract with the owner of a dwelling unit, the PHA must determine that all the following program requirements are met:

- The unit itself must qualify as an eligible unit [24 CFR 982.305(a)]
- The unit must be inspected by the PHA and meet the Housing Quality Standards (HQS) [24 CFR 982.305(a)]
- The lease offered by the owner must be approvable and must include the required Tenancy Addendum [24 CFR 982.305(a)]
- The rent to be charged by the owner for the unit must be reasonable [24 CFR 982.305(a)]
- The owner must be an eligible owner, approvable by the PHA, with no conflicts of interest [24 CFR 982.306]
- For families initially leasing a unit only: Where the gross rent of the unit exceeds the applicable payment standard for the family, the share of rent to be paid by the family cannot exceed 40 percent of the family's monthly adjusted income [24 CFR 982.305(a)]

9-I.A. TENANT SCREENING

The PHA has no liability or responsibility to the owner or other persons for the family's behavior or suitability for tenancy [24 CFR 982.307(a)(1)].

The PHA may elect to screen applicants for family behavior or suitability for tenancy. See Chapter 3 for a discussion of the PHA's policies with regard to screening applicant families for program eligibility [24 CFR 982.307(a)(1)].

The owner is responsible for screening and selection of the family to occupy the owner's unit. At or before PHA approval of the tenancy, the PHA must inform the owner that screening and selection for tenancy is the responsibility of the owner [24 CFR 982.307(a)(2)]. The PHA must also inform the owner or manager of their responsibility to comply with VAWA [24 CFR 5.2007(3)(ii)].

The PHA must provide the owner with the family's current and prior address (as shown in the PHA records); and the name and address (if known to the PHA) of the landlord at the family's current and prior address. [24 CFR 982.307 (b)(1)].

The PHA is permitted, but not required, to offer the owner other information in the PHA's possession about the family's tenancy [24 CFR 982.307(b)(2)].

The PHA's policy on providing information to the owner must be included in the family's briefing packet [24 CFR 982.307(b)(3)].

PHA Policy

The PHA will not screen applicants for family behavior or suitability for tenancy.

The PHA will not provide additional screening information to the owner.

9-I.B. REQUESTING TENANCY APPROVAL [Form HUD-52517]

After the family is issued a voucher, the family must locate an eligible unit, with an owner or landlord willing to participate in the voucher program. Once a family finds a suitable unit and the owner is willing to lease the unit under the program, the owner and the family must request the PHA to approve the assisted tenancy in the selected unit.

The owner and the family must submit two documents to the PHA:

- Completed Request for Tenancy Approval (RTA) – Form HUD-52517
- Copy of the proposed lease, including the HUD-prescribed Tenancy Addendum – Form HUD-52641-A

The RTA contains important information about the rental unit selected by the family, including the unit address, number of bedrooms, structure type, year constructed, utilities included in the rent, and the requested beginning date of the lease, necessary for the PHA to determine whether to approve the assisted tenancy in this unit.

Owners must certify to the most recent amount of rent charged for the unit and provide an explanation for any difference between the prior rent and the proposed rent.

Owners must certify that they are not the parent, child, grandparent, grandchild, sister or brother of any member of the family, unless the PHA has granted a request for reasonable accommodation for a person with disabilities who is a member of the tenant household.

For units constructed prior to 1978, owners must either 1) certify that the unit, common areas, and exterior have been found to be free of lead-based paint by a certified inspector; or 2) attach a lead-based paint disclosure statement.

Both the RTA and the proposed lease must be submitted no later than the expiration date stated on the voucher. [HCV GB p.8-15].

PHA Policy

The RTA must be signed by both the family and the owner.

The owner may submit the RTA on behalf of the family.

Completed RTA (including the proposed dwelling lease) must be submitted as hard copies, in-person, by mail, or by fax.

The family may not submit, and the PHA will not process, more than one (1) RTA at a time.

When the family submits the RTA the PHA will review the RTA for completeness.

If the RTA is incomplete (including lack of signature by family, owner, or both), or if the dwelling lease is not submitted with the RTA, the PHA will notify the family and the owner of the deficiencies.

Missing information and/or missing documents will only be accepted as hard copies, in-person, by mail, or by fax. The PHA will not accept missing information over the phone.

When the family submits the RTA and proposed lease, the PHA will also review the terms of the RTA for consistency with the terms of the proposed lease.

If the terms of the RTA are not consistent with the terms of the proposed lease, the PHA will notify the family and the owner of the discrepancies.

Corrections to the terms of the RTA and/or the proposed lease will only be accepted as hard copies, in-person, by mail or by fax. The PHA will not accept corrections by phone.

Because of the time sensitive nature of the tenancy approval process, the PHA will attempt to communicate with the owner and family by phone, fax, or email. The PHA will use mail when the parties can't be reached by phone, fax, or email.

9-I.C. OWNER PARTICIPATION

The PHA does not formally approve an owner to participate in the HCV program. However, there are a number of criteria where the PHA may deny approval of an assisted tenancy based on past owner behavior, conflict of interest, or other owner-related issues. No owner has a right to participate in the HCV program [24 CFR 982.306(e)]

See Chapter 13 for a full discussion of owner qualification to participate in the HCV program.

9-I.D. ELIGIBLE UNITS

There are a number of criteria that a dwelling unit must meet in order to be eligible for assistance under the voucher program. Generally, a voucher-holder family may choose any available rental dwelling unit on the market in the PHA's jurisdiction. This includes the dwelling unit they are currently occupying.

Ineligible Units [24 CFR 982.352(a)]

The PHA may not assist a unit under the voucher program if the unit is a public housing or Indian housing unit; a unit receiving project-based assistance under section 8 of the 1937 Act (42 U.S.C. 1437f); nursing homes, board and care homes, or facilities providing continual psychiatric, medical, or nursing services; college or other school dormitories; units on the grounds of penal, reformatory, medical, mental, and similar public or private institutions; a unit occupied by its owner or by a person with any interest in the unit.

PHA-Owned Units [24 CFR 982.352(b)]

Otherwise eligible units that are owned or substantially controlled by the PHA issuing the voucher may also be leased in the voucher program. In order for a PHA-owned unit to be leased under the voucher program, the unit must not be ineligible housing and the PHA must inform the family, both orally and in writing, that the family has the right to select any eligible unit available for lease and that the family is free to select a PHA-owned unit without any pressure or steering by the PHA.

PHA Policy

The PHA does not have any eligible PHA-owned units available for leasing under the voucher program.

Special Housing Types [24 CFR 982 Subpart M]

HUD regulations permit, but do not generally require, the PHA to permit families to use voucher assistance in a number of special housing types in accordance with the specific requirements applicable to those programs. These special housing types include single room occupancy (SRO) housing, congregate housing, group home, shared housing, manufactured home space (where the family owns the manufactured home and leases only the space), cooperative housing and homeownership option. See Chapter 15 for specific information and policies on any of these housing types that the PHA has chosen to allow.

The regulations do require the PHA to permit use of any special housing type if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.

Duplicative Assistance [24 CFR 982.352(c)]

A family may not receive the benefit of HCV tenant-based assistance while receiving the benefit of any of the following forms of other housing subsidy, for the same unit or for a different unit:

- Public or Indian housing assistance;
- Other Section 8 assistance (including other tenant-based assistance);
- Assistance under former Section 23 of the United States Housing Act of 1937 (before amendment by the Housing and Community Development Act of 1974);
- Section 101 rent supplements;
- Section 236 rental assistance payments;
- Tenant-based assistance under the HOME Program;
- Rental assistance payments under Section 521 of the Housing Act of 1949 (a program of the Rural Development Administration);
- Any local or State rent subsidy;
- Section 202 supportive housing for the elderly;
- Section 811 supportive housing for persons with disabilities; (11) Section 202 projects for non-elderly persons with disabilities (Section 162 assistance); or
- Any other duplicative federal, State, or local housing subsidy, as determined by HUD. For this purpose, 'housing subsidy' does not include the housing component of a welfare payment, a social security payment received by the family, or a rent reduction because of a tax credit.

Housing Quality Standards (HQS) [24 CFR 982.305 and 24 CFR 982.401]

In order to be eligible, the dwelling unit must be in decent, safe and sanitary condition. This determination is made using HUD's Housing Quality Standards (HQS) and/or equivalent state or local standards approved by HUD. See Chapter 8 for a full discussion of the HQS standards, as well as the process for HQS inspection at initial lease-up.

Unit Size

In order to be eligible, the dwelling unit must be appropriate for the number of persons in the household. A family must be allowed to lease an otherwise acceptable dwelling unit with fewer bedrooms than the number of bedrooms stated on the voucher issued to the family, provided the unit meets the applicable HQS space requirements [24 CFR 982.402(d)]. The family must be allowed to lease an otherwise acceptable dwelling unit with more bedrooms than the number of bedrooms stated on the voucher issued to the family. See Chapter 5 for a full discussion of subsidy standards.

Rent Reasonableness [24 CFR 982.305 and 24 CFR 982.507]

In order to be eligible, the dwelling unit must have a reasonable rent. The rent must be reasonable in relation to comparable unassisted units in the area and must not be in excess of rents charged by the owner for comparable, unassisted units on the premises. See Chapter 8 for a full discussion of rent reasonableness and the rent reasonableness determination process.

Rent Burden [24 CFR 982.508]

Where a family is initially leasing a unit and the gross rent of the unit exceeds the applicable payment standard for the family, the dwelling unit rent must be at a level where the family's share of rent does not exceed 40 percent of the family's monthly adjusted income. See Chapter 6 for a discussion of calculation of gross rent, the use of payment standards, and calculation of family income, family share of rent and HAP.

9-I.E. LEASE AND TENANCY ADDENDUM

The family and the owner must execute and enter into a written dwelling lease for the assisted unit. This written lease is a contract between the tenant family and the owner; the PHA is not a party to this contract.

The tenant must have legal capacity to enter a lease under State and local law. 'Legal capacity' means that the tenant is bound by the terms of the lease and may enforce the terms of the lease against the owner [24 CFR 982.308(a)]

Lease Form and Tenancy Addendum [24 CFR 982.308]

If the owner uses a standard lease form for rental to unassisted tenants in the locality or the premises, the lease must be in such standard form. If the owner does not use a standard lease form for rental to unassisted tenants, the owner may use another form of lease. The HAP contract prescribed by HUD contains the owner's certification that if the owner uses a standard lease form for rental to unassisted tenants, the lease is in such standard form.

All provisions in the HUD-required Tenancy Addendum must also be added word-for-word to the owner's standard lease form, for use with the assisted family. The Tenancy Addendum includes the tenancy requirements for the program and the composition of the household as approved by the PHA. As a part of the lease, the tenant shall have the right to enforce the Tenancy Addendum against the owner and the terms of the Tenancy Addendum shall prevail over any other provisions of the lease.

PHA Policy

The PHA does not provide a model or standard dwelling lease for owners to use in the HCV program.

Lease Information [24 CFR 982.308(d)]

The assisted dwelling lease must contain all of the required information as listed below:

- The names of the owner and the tenant:
- The unit rented (address, apartment number, and any other information needed to identify the contract unit)
- The term of the lease (initial term and any provisions for renewal)
- The amount of the monthly rent to owner
- A specification of what utilities and appliances are to be supplied by the owner, and what utilities and appliances are to be supplied by the family

Term of Assisted Tenancy

The initial term of the assisted dwelling lease must be for at least one year [24 CFR 982.309]. The initial lease term is also stated in the HAP contract.

The HUD program regulations permit the PHA to approve a shorter initial lease term if certain conditions are met.

PHA Policy

The PHA will not approve an initial lease term of less than one (1) year.

During the initial term of the lease, the owner may not raise the rent to owner [24 CFR 982.309].

Any provisions for renewal of the dwelling lease will be stated in the dwelling lease [HCV Guidebook, pg. 8-22]. There are no HUD requirements regarding any renewal extension terms, except that they must be in the dwelling lease if they exist.

The PHA may execute the HAP contract even if there is less than one year remaining from the beginning of the initial lease term to the end of the last expiring funding increment under the consolidated ACC. [24 CFR 982.309(b)].

Security Deposit [24 CFR 982.313 (a) and (b)]

The owner may collect a security deposit from the tenant. The PHA may prohibit security deposits in excess of private market practice, or in excess of amounts charged by the owner to unassisted tenants. However, if the PHA chooses to do so, language to this effect must be added to Part A of the HAP contract [Form HUD-52641].

PHA Policy

The PHA will allow the owner to collect any security deposit amount the owner determines is appropriate. Therefore, no modifications to the HAP contract will be necessary.

Separate Non-Lease Agreements between Owner and Tenant

Owners may not demand or accept any rent payment from the family in excess of the rent to the owner minus the PHA's housing assistance payments to the owner [24 CFR 982.451(b)(4)].

The owner may not charge the tenant extra amounts for items customarily included in rent in the locality, or provided at no additional cost to unsubsidized tenants in the premises [24 CFR 982.510(c)].

PHA Policy

The PHA permits owners and families to execute separate, non-lease agreements for services, appliances (other than range and refrigerator) and other items that are not included in the lease.

Any items, appliances, or other services that are customarily provided to unassisted families as part of the dwelling lease with those families, or are permanently installed in the dwelling unit must be included in the dwelling lease for the assisted family. These items, appliances or services cannot be placed under a separate non-lease agreement between the owner and family. Side payments for additional rent, or for items, appliances or services customarily provided to unassisted families as part of the dwelling lease for those families, are prohibited.

Any items, appliances, or other services that are not customarily provided to unassisted families as part of the dwelling lease with those families, are not permanently installed in the dwelling unit and where the family has the sole option of not utilizing the item, appliance or service, may be included in a separate non-lease agreement between the owner and the family.

The family is not liable and cannot be held responsible under the terms of the assisted dwelling lease for any charges pursuant to a separate non-lease agreement between the owner and the family. Non-payment of any charges pursuant to a separate non-lease agreement between the owner and the family cannot be a cause for eviction or termination of tenancy under the terms of the assisted dwelling lease.

Separate non-lease agreements that involve additional items, appliances or other services may be considered amenities offered by the owner and may be taken into consideration when determining the reasonableness of the rent for the property.

PHA Review of Lease

The PHA will review the dwelling lease for compliance with all applicable requirements.

PHA Policy

If the dwelling lease is incomplete or incorrect, the PHA will notify the family and the owner of the deficiencies. Missing and corrected lease information will only be accepted as hard copies, in-person, by mail, or by fax. The PHA will not accept missing and corrected information over the phone.

Because the initial leasing process is time-sensitive, the PHA will attempt to communicate with the owner and family by phone, fax, or email. The PHA will use mail

when the parties can't be reached by phone, fax, or email.

The PHA is permitted, but is not required, to review the lease to determine if the lease complies with State and local law and is permitted to decline to approve the tenancy if the PHA determines that the lease does not comply with State or local law [24 CFR 982.308(c)]

PHA Policy

The PHA will not review the owner's lease for compliance with state/local law.

9-I.F. TENANCY APPROVAL [24 CFR 982.305]

After receiving the family's Request for Tenancy Approval, with proposed dwelling lease, the PHA must promptly notify the family and owner whether the assisted tenancy is approved.

Prior to approving the assisted tenancy and execution of a HAP contract, the PHA must ensure that all required actions and determinations, discussed in Part I of this chapter have been completed.

These actions include ensuring that the unit is eligible; the unit has been inspected by the PHA and meets the Housing Quality Standards (HQS); the lease offered by the owner is approvable and includes the required Tenancy Addendum; the rent to be charged by the owner for the unit must be reasonable; where the family is initially leasing a unit and the gross rent of the unit exceeds the applicable payment standard for the family, the share of rent to be paid by the family does not exceed 40 percent of the family's monthly adjusted income [24 CFR 982.305(a)]; the owner is an eligible owner, not disapproved by the PHA, with no conflicts of interest [24 CFR 982.306]; the family and the owner have executed the lease, including the Tenancy Addendum, and the lead-based paint disclosure information [24 CFR 982.305(b)].

PHA Policy

The PHA will complete its determination within 10 business days of receiving all required information.

If the terms of the RTA/proposed lease are changed for any reason, including but not limited to negotiation with the PHA, the PHA will obtain corrected copies of the RTA and proposed lease, signed by the family and the owner.

Corrections to the RTA/proposed lease will only be accepted as hard copies, in-person, by mail, or by fax. The PHA will not accept corrections over the phone.

If the PHA determines that the tenancy cannot be approved for any reason, the owner and the family will be notified in writing and given the opportunity to address any reasons for disapproval. The PHA will instruct the owner and family of the steps that are necessary to approve the tenancy.

Where the tenancy is not approvable because the unit is not approvable, the family must continue to search for eligible housing within the timeframe of the issued voucher.

If the tenancy is not approvable due to rent affordability (including rent burden and rent reasonableness), the PHA will attempt to negotiate the rent with the

owner. If a new, approvable rent is negotiated, the tenancy will be approved. If the owner is not willing to negotiate an approvable rent, the family must continue to search for eligible housing within the timeframe of the issued voucher.

9-I.G. HAP CONTRACT EXECUTION [24 CFR 982.305]

The HAP contract is a written agreement between the PHA and the owner of the dwelling unit occupied by a housing choice voucher assisted family. Under the HAP contract, the PHA agrees to make housing assistance payments to the owner on behalf of a specific family occupying a specific unit and obliges the owner to comply with all program requirements.

The HAP contract format is prescribed by HUD.

If the PHA has given approval for the family of the assisted tenancy, the owner and the PHA execute the HAP contract.

The term of the HAP contract must be the same as the term of the lease [24 CFR 982.451(a)(2)].

The PHA is permitted to execute a HAP contract even if the funding currently available does not extend for the full term of the HAP contract.

The PHA must make a best effort to ensure that the HAP contract is executed before the beginning of the lease term. Regardless, the HAP contract must be executed no later than 60 calendar days from the beginning of the lease term.

The PHA may not pay any housing assistance payment to the owner until the HAP contract has been executed. If the HAP contract is executed during the period of 60 calendar days from the beginning of the lease term, the PHA will pay housing assistance payments after execution of the HAP contract (in accordance with the terms of the HAP contract), to cover the portion of the lease term before execution of the HAP contract (a maximum of 60 days).

Any HAP contract executed after the 60 day period is void, and the PHA may not pay any housing assistance payment to the owner.

PHA Policy

Owners who have not previously participated in the HCV program must attend a meeting with the PHA in which the terms of the Tenancy Addendum and the HAP contract will be explained. The PHA may waive this requirement on a case-by-case basis, if it determines that the owner is sufficiently familiar with the requirements and responsibilities under the HCV program.

The owner and the assisted family will execute the dwelling lease and the owner must provide a copy to the PHA. The PHA will ensure that both the owner and the assisted family receive copies of the dwelling lease.

The owner and the PHA will execute the HAP contract. The PHA will not execute the HAP contract until the owner has submitted IRS form W-9. The PHA will ensure that the owner receives a copy of the executed HAP contract.

See Chapter 13 for a discussion of the HAP contract and contract provisions.

9-I.H. CHANGES IN LEASE OR RENT [24 CFR 982.308]

If the tenant and the owner agree to any changes in the lease, such changes must be in writing, and the owner must immediately give the PHA a copy of such changes. The lease, including any changes, must remain in accordance with the requirements of this chapter.

Generally, PHA approval of tenancy and execution of a new HAP contract are not required for changes in the lease. However, under certain circumstances, voucher assistance in the unit shall not be continued unless the PHA has approved a new tenancy in accordance with program requirements and has executed a new HAP contract with the owner. These circumstances include:

- Changes in lease requirements governing tenant or owner responsibilities for utilities or appliances
- Changes in lease provisions governing the term of the lease
- The family moves to a new unit, even if the unit is in the same building or complex

In these cases, if the HCV assistance is to continue, the family must submit a new Request for Tenancy Approval (RTA) along with a new dwelling lease containing the altered terms. A new tenancy must then be approved in accordance with this chapter.

Where the owner is changing the amount of rent, the owner must notify the PHA of any changes in the amount of the rent to owner at least 60 days before any such changes go into effect [24 CFR 982.308(g)(4)]. The PHA will agree to such an increase only if the amount of the rent to owner is considered reasonable according to the rent reasonableness standards discussed in Chapter 8. If the requested rent is not found to be reasonable, the owner must either reduce the requested rent increase, or give the family notice in accordance with the terms of the lease.

No rent increase is permitted during the initial term of the lease [24 CFR 982.309(a)(3)].

PHA Policy

Where the owner is requesting a rent increase, the PHA will determine whether the requested increase is reasonable within 10 business days of receiving the request from the owner. The owner will be notified of the determination in writing.

Rent increases will go into effect on the first of the month following the 60 day period after the owner notifies the PHA of the rent change or on the date specified by the owner, whichever is later.

Chapter 10

MOVING WITH CONTINUED ASSISTANCE AND PORTABILITY

INTRODUCTION

Freedom of choice is a hallmark of the housing choice voucher (HCV) program. In general, therefore, HUD regulations impose few restrictions on where families may live or move with HCV assistance. This chapter sets forth HUD regulations and PHA policies governing moves within or outside the PHA's jurisdiction in two parts:

Part I: Moving with Continued Assistance. This part covers the general rules that apply to all moves by a family assisted under the PHA's HCV program, whether the family moves to another unit within the PHA's jurisdiction or to a unit outside the PHA's jurisdiction under portability.

Part II: Portability. This part covers the special rules that apply to moves by a family under portability, whether the family moves out of or into the PHA's jurisdiction. This part also covers the special responsibilities that the PHA has under portability regulations and procedures.

PART I

MOVING WITH CONTINUED ASSISTANCE

10-I.A. ALLOWABLE MOVES

HUD lists five regulatory conditions and the statutory condition under VAWA in which an assisted family is allowed to move to a new unit with continued assistance. Permission to move is subject to the restrictions set forth in section 10-I.B.

- The family has a right to terminate the lease on notice to the owner (for the owner’s breach or otherwise) and has given a notice of termination to the owner in accordance with the lease [24 CFR 982.314(b)(3)]. If the family terminates the lease on notice to the owner, the family must give the PHA a copy of the notice at the same time [24 CFR 982.314(d)(1)].
- The Violence Against Women Reauthorization Act of 2005 provides that “a family may receive a voucher from a public housing agency and move to another jurisdiction under the tenant-based assistance program if the family has complied with all other obligations of the section 8 program and has moved out of the assisted dwelling unit in order to protect the health or safety of an individual who is or has been a victim of domestic violence, dating violence, or stalking and who reasonably believed he or she was imminently threatened by harm from further violence if he or she remained in the assisted dwelling unit” [24 CFR 982.353(b)].
- The lease for the family’s unit has been terminated by mutual agreement of the owner and the family [24 CFR 982.314(b)(1)(ii)].

PHA Policy

If the family and the owner mutually agree to terminate the lease for the family’s unit, the family must give the PHA a copy of the termination agreement.

- The owner has given the family a notice to vacate, has commenced an action to evict the family, or has obtained a court judgment or other process allowing the owner to evict the family [24 CFR 982.314(b)(2)]. The family must give the PHA a copy of any owner eviction notice [24 CFR 982.551(g)].
- The PHA has terminated the assisted lease for the family’s unit for the owner’s breach [24 CFR 982.314(b)(1)(i)].
- The PHA determines that the family’s current unit does not meet the HQS space standards because of an increase in family size or a change in family composition. In such cases, the PHA must issue the family a new voucher, and the family and PHA must try to find an acceptable unit as soon as possible. If an acceptable unit is available for the family, the PHA must terminate the HAP contract for the family’s old unit in accordance with the HAP contract terms and must notify both the family and the owner of the termination. The HAP contract terminates at the end of the calendar month that follows the calendar month in which the PHA gives notice to the owner. [24 CFR 982.403(a) and (c)]

10-I.B. RESTRICTIONS ON MOVES

A family's right to move is generally contingent upon the family's compliance with program requirements [24 CFR 982.1(b)(2)]. HUD specifies two conditions under which a PHA may deny a family permission to move and two ways in which a PHA may restrict moves by a family.

Denial of Moves

HUD regulations permit the PHA to deny a family permission to move under the following conditions:

Insufficient Funding

The PHA may deny a family permission to move if the PHA does not have sufficient funding for continued assistance [24 CFR 982.314(e)(1)]. However, Notice PIH 2008-43 significantly restricts the ability of PHAs to deny permission to move under portability due to insufficient funding. The requirements found in this notice are mandatory. **For moves outside the PHA's jurisdiction under portability, no policy decisions are required.**

PHA Policy

The PHA will deny a family permission to move on grounds that the PHA does not have sufficient funding for continued assistance if (a) the move is initiated by the family, not the owner or the PHA; (b) the PHA can demonstrate that the move will, in fact, result in higher subsidy costs; and (c) the PHA can demonstrate, in accordance with the policies in Part VIII of Chapter 16, that it does not have sufficient funding in its annual budget to accommodate the higher subsidy costs.

If the PHA denies a family request to move due to insufficient funds, it will mail the family a letter stating that the denial is due to lack of funding and the family's request will remain open for twelve (12) months. The PHA may not subsequently admit any additional families to the voucher program before it assist the family seeking to move.

Grounds for Denial or Termination of Assistance

The PHA has grounds for denying or terminating the family's assistance [24 CFR 982.314(e)(2)]. VAWA allows exceptions to these grounds for denial or termination of assistance for families who are otherwise in compliance with program obligations, but have moved to protect the health or safety of an individual who is or has been a victim of domestic violence, dating violence or stalking, and who reasonably believed he or she was imminently threatened by harm from further violence if they remained in the unit [24 CFR 982.353(b)].

PHA Policy

If the PHA has grounds for denying or terminating a family's assistance, the PHA will act on those grounds in accordance with the regulations and policies set forth in Chapters 3 and 12, respectively. In general, it will not deny a family permission to move for this reason; however, it retains the discretion to do so under special circumstances. Refer to sections 3-III.G and 12-II.E for VAWA provisions.

Restrictions on Elective Moves [24 CFR 982.314(c)]

HUD regulations permit the PHA to prohibit any elective move by a participant family during

the family's initial lease term. They also permit the PHA to prohibit more than one elective move by a participant family during any 12-month period.

PHA Policy

The PHA will deny a family permission to make an elective move during the family's initial lease term. This policy applies to moves within the PHA's jurisdiction or outside it under portability.

The PHA will also deny a family permission to make more than one elective move during any 12-month period. This policy applies to all assisted families residing in the PHA's jurisdiction.

The PHA will consider exceptions to these policies for the following reasons: to protect the health or safety of a family member (e.g., lead-based paint hazards, domestic violence, witness protection programs), to accommodate a change in family circumstances (e.g., new employment, school attendance in a distant area), or to address an emergency situation over which a family has no control.

In addition, the PHA will allow exceptions to these policies for purposes of reasonable accommodation of a family member who is a person with disabilities (see Chapter 2).

10-I.C. MOVING PROCESS

Notification

If a family wishes to move to a new unit, the family must notify the PHA and the owner before moving out of the old unit or terminating the lease on notice to the owner [24 CFR 982.314(d)(2)]. If the family wishes to move to a unit outside the PHA's jurisdiction under portability, the notice to the PHA must specify the area where the family wishes to move [24 CFR 982.314(d)(2), Notice PIH 2008-43]. The notices must be in writing [24 CFR 982.5].

Approval

PHA Policy

Upon receipt of a family's notification that it wishes to move, the PHA will determine whether the move is approvable in accordance with the regulations and policies set forth in sections 10-I.A and 10-I.B. The PHA will notify the family in writing of its determination within 30 calendar days following receipt of the family's notification.

Reexamination of Family Income and Composition

PHA Policy

For families approved to move to a new unit within the PHA's jurisdiction, the PHA will perform a new annual reexamination in accordance with the policies set forth in Chapter 11 of this plan.

For families moving into or families approved to move out of the PHA's jurisdiction under portability, the PHA will follow the policies set forth in Part II of this chapter.

Voucher Issuance and Briefing

PHA Policy

For families approved to move to a new unit within the PHA's jurisdiction, the PHA will issue a new voucher within 30 calendar days of the PHA's written approval to move. No briefing is required for these families. The PHA will follow the policies set forth in Chapter 5 on voucher term, extension, and expiration. If a family does not locate a new unit in accordance with the lease and the Housing Assistance Payment Contract. Otherwise, the family will lose its assistance.

For families moving into or families approved to move out of the PHA's jurisdiction under portability, the PHA will follow the policies set forth in Part II of this chapter.

Housing Assistance Payments [24 CFR 982.311(d)]

When a family moves out of an assisted unit, the PHA may not make any housing assistance payment to the owner for any month **after** the month the family moves out. The owner may keep the housing assistance payment for the month when the family moves out of the unit.

If a participant family moves from an assisted unit with continued tenant-based assistance, the term of the assisted lease for the new assisted unit may begin during the month the family moves out of the first assisted unit. Overlap of the last housing assistance payment (for the month when the family moves out of the old unit) and the first assistance payment for the new unit, is not considered to constitute a duplicative housing subsidy.

PART II

PORTABILITY

10-II.A. OVERVIEW

Within the limitations of the regulations and this plan, a participant family or an applicant family that has been issued a voucher has the right to use tenant-based voucher assistance to lease a unit anywhere in the United States providing that the unit is located within the jurisdiction of a PHA administering a tenant-based voucher program [24 CFR 982.353(b)]. The process by which a family obtains a voucher from one PHA and uses it to lease a unit in the jurisdiction of another PHA is known as portability. The first PHA is called the **initial PHA**. The second is called the **receiving PHA**.

The receiving PHA has the option of administering the family's voucher for the initial PHA or absorbing the family into its own program. Under the first option, the receiving PHA bills the initial PHA for the family's housing assistance payments and the fees for administering the family's voucher. Under the second option, the receiving PHA pays for the family's assistance out of its own program funds, and the initial PHA has no further relationship with the family.

The same PHA commonly acts as the initial PHA for some families and as the receiving PHA for others. Each role involves different responsibilities. The PHA will follow the rules and policies in section 10-II.B when it is acting as the initial PHA for a family. It will follow the rules and policies in section 10-II.C when it is acting as the receiving PHA for a family.

10-II.B. INITIAL PHA ROLE

Allowable Moves under Portability

A family may move with voucher assistance only to an area where there is at least one PHA administering a voucher program [24 CFR 982.353(b)]. If there is more than one PHA in the area, the initial PHA may choose the receiving PHA [24 CFR 982.355(b)].

Applicant families that have been issued vouchers as well as participant families may qualify to lease a unit outside the PHA's jurisdiction under portability. The initial PHA, in accordance with HUD regulations and PHA policy, determines whether a family qualifies.

Applicant Families

Under HUD regulations, most applicant families qualify to lease a unit outside the PHA's jurisdiction under portability. However, HUD gives the PHA discretion to deny a portability move by an applicant family for the same two reasons that it may deny any move by a participant family: insufficient funding and grounds for denial or termination of assistance.

PHA Policy

In determining whether or not to deny an applicant family permission to move under portability because the PHA lacks sufficient funding or has grounds for denying assistance to the family, the initial PHA will follow the policies established in section 10-I.B of this chapter.

In addition, the PHA may establish a policy denying the right to portability to nonresident applicants during the first 12 months after they are admitted to the program [24 CFR 982.353(c)].

PHA Policy

If neither the head of household nor the spouse/co-head of an applicant family had a domicile (legal residence) in the PHA's jurisdiction at the time the family's application for assistance was submitted, the family must live in the PHA's jurisdiction with voucher assistance for at least 12 months before requesting portability.

The PHA will consider exceptions to this policy for purposes of reasonable accommodation (see Chapter 2). However, any exception to this policy is subject to the approval of the receiving PHA [24 CFR 982.353(c)(3)].

Participant Families

The initial PHA must not provide portable assistance for a participant if a family has moved out of its assisted unit in violation of the lease [24 CFR 982.353(b)]. VAWA creates an exception to this prohibition for families who are otherwise in compliance with program obligations but have moved to protect the health or safety of an individual who is or has been a victim of domestic violence, dating violence or stalking and who reasonably believed he or she was imminently threatened by harm from further violence if they remained in the unit [24 CFR 982.353(b)].

PHA Policy

The PHA will determine whether a participant family may move out of the PHA's jurisdiction with continued assistance in accordance with the regulations and policies set forth here and in sections 10-I.A and 10-I.B of this chapter. The PHA will notify the family of its determination in accordance with the approval policy set forth in section 10-I.C of this chapter.

Determining Income Eligibility

Applicant Families

An applicant family may lease a unit in a particular area under portability only if the family is income eligible for admission to the voucher program in that area [24 CFR 982.353(d)(3)]. The family must specify the area to which the family wishes to move [Notice 2008-43].

The initial PHA is responsible for determining whether the family is income eligible in the area to which the family wishes to move [24 CFR 982.355(c)(1)]. If the applicant family is not income eligible in that area, the PHA must inform the family that it may not move there and receive voucher assistance [Notice PIH 2008-43].

Participant Families

The income eligibility of a participant family is not redetermined if the family moves to a new jurisdiction under portability [24 CFR 982.353(d)(2), 24 CFR 982.355(c)(1)].

Reexamination of Family Income and Composition

No new reexamination of family income and composition is required for an applicant family.

PHA Policy

For a participant family approved to move out of its jurisdiction under portability, the PHA generally will conduct a reexamination of family income and composition only if the family's annual reexamination must be completed on or before the initial billing deadline specified on form HUD-52665, Family Portability Information.

The PHA will make any exceptions to this policy necessary to remain in compliance with HUD regulations.

Briefing

The regulations and policies on briefings set forth in Chapter 5 of this plan require the PHA to provide information on portability to all applicant families that qualify to lease a unit outside the PHA's jurisdiction under the portability procedures. Therefore, no special briefing is required for these families.

PHA Policy

No formal briefing will be required for a participant family wishing to move outside the PHA's jurisdiction under portability. However, the PHA will provide the family with the same oral and written explanation of portability that it provides to applicant families selected for admission to the program (see Chapter 5). The PHA will provide the name, address, and phone of the contact for the PHA in the jurisdiction to which they wish to move. The PHA will advise the family that they will be under the PHA's policies and procedures, including subsidy standards and voucher extension policies.

Voucher Issuance and Term

An applicant family has no right to portability until after the family has been issued a voucher [24 CFR 982.353(b)]. In issuing vouchers to applicant families, the PHA will follow the regulations and procedures set forth in Chapter 5. A new voucher is not required for portability purposes.

PHA Policy

For families approved to move under portability, the PHA will issue a new voucher within 30 calendar days of the PHA's written approval to move.

The initial term of the voucher will be 60 days.

Voucher Extensions and Expiration

PHA Policy

The PHA will approve **no** extensions to a voucher issued to an applicant or participant family porting out of the PHA's jurisdiction except under the following circumstances: (a) the initial term of the voucher will expire before the portable family will be issued a voucher by the receiving PHA, (b) the family decides to return to the initial PHA's jurisdiction and search for a unit there, or (c) the family decides to search for a unit in a third PHA's jurisdiction. In such cases, the policies on voucher extensions set forth in Chapter 5, section 5-II.E, of this plan will apply, including the requirement that the

family apply for an extension in writing prior to the expiration of the initial voucher term.

To receive or continue receiving assistance under the initial PHA's voucher program, a family that moves to another PHA's jurisdiction under portability must be under HAP contract in the receiving PHA's jurisdiction within 60 days following the expiration date of the initial PHA's voucher term (including any extensions). (Exception under "Initial Billing Deadline" below)

Initial Contact with the Receiving PHA

After approving a family's request to move under portability, the initial PHA must promptly notify the receiving PHA to expect the family [24 CFR 982.355(c)(2)]. This means that the initial PHA must contact the receiving PHA directly on the family's behalf [Notice PIH 2008-43]. The initial PHA must also advise the family how to contact and request assistance from the receiving PHA [24 CFR 982.355(c)(2)].

PHA Policy

Because the portability process is time-sensitive, the PHA will notify the receiving PHA by phone, fax, or e-mail to expect the family. The initial PHA will also ask the receiving PHA to provide any information the family may need upon arrival, including the name, fax, email and telephone number of the staff person responsible for business with incoming portable families and procedures related to appointments for voucher issuance. The PHA will pass this information along to the family. The PHA will also ask for the name, address, telephone number, fax and email of the person responsible for processing the billing information.

Sending Documentation to the Receiving PHA

The initial PHA is required to send the receiving PHA the following documents:

- Form HUD-52665, Family Portability Information, with Part I filled out [Notice PIH 2008-43]
- A copy of the family's voucher [Notice PIH 2008-43]
- A copy of the family's most recent form HUD-50058, Family Report, or, if necessary in the case of an applicant family, family and income information in a format similar to that of form HUD-50058 [24 CFR 982.355(c)(4), Notice PIH 2008-43]
- Copies of the income verifications backing up the form HUD-50058, including a copy of the family's current EIV data [24 CFR 982.355(c)(4), Notice PIH 2008-43]

PHA Policy

In addition to these documents, the PHA will provide the following information, if available, to the receiving PHA:

Social security numbers (SSNs)

Documentation of SSNs for all nonexempt household members whose SSNs have not been verified through the EIV system

Documentation of legal identity

Documentation of citizenship or eligible immigration status

Documentation of participation in the earned income disallowance (EID) benefit

Documentation of participation in a family self-sufficiency (FSS) program

The PHA will notify the family in writing regarding any information provided to the receiving PHA [HCV GB, p. 13-3].

Initial Billing Deadline [Notice PIH 2008-43]

When the initial PHA sends form HUD-52665 to the receiving PHA, it specifies in Part I the deadline by which it must receive the initial billing notice from the receiving PHA. This deadline is 60 days following the expiration date of the voucher issued to the family by the initial PHA. If the initial PHA does not receive a billing notice by the deadline and does not intend to honor a late billing submission, it must contact the receiving PHA to determine the status of the family. If the receiving PHA reports that the family is not yet under HAP contract, the initial PHA may refuse to accept a late billing submission. If the receiving PHA reports that the family is under HAP contract and the receiving PHA cannot absorb the family, the initial PHA must accept a late billing submission; however, it may report to HUD the receiving PHA's failure to comply with the deadline.

PHA Policy

If the PHA has not received an initial billing notice from the receiving PHA by the deadline specified on form HUD-52665, it will contact the receiving PHA by phone, fax, or e-mail on the next business day. If the PHA reports that the family is not yet under HAP contract, the PHA will inform the receiving PHA that it will not honor a late billing submission and will return any subsequent billings that it receives on behalf of the family. The PHA will send the receiving PHA a written confirmation of its decision by mail.

The PHA will allow an exception to this policy if the family includes a person with disabilities and the late billing is a result of a reasonable accommodation granted to the family by the receiving PHA.

Monthly Billing Payments [24 CFR 982.355(e), Notice PIH 2008-43]

If the receiving PHA is administering the family's voucher, the initial PHA is responsible for making billing payments in a timely manner. The first billing amount is due within 30 calendar days after the initial PHA receives Part II of form HUD-52665 from the receiving PHA. Subsequent payments must be **received** by the receiving PHA no later than the fifth business day of each month. The payments must be provided in a form and manner that the receiving PHA is able and willing to accept.

The initial PHA may not terminate or delay making payments under existing portability billing arrangements as a result of over leasing or funding shortfalls. The PHA must manage its tenant-based program in a manner that ensures that it has the financial ability to provide assistance for families that move out of its jurisdiction under portability and are not absorbed by receiving PHAs as well as for families that remain within its jurisdiction.

PHA Policy

The initial PHA will utilize direct deposit to ensure that the payment is received by the deadline unless the receiving PHA notifies the initial PHA that direct deposit is not acceptable to them.

Annual Updates of Form HUD-50058

If the initial PHA is being billed on behalf of a portable family, it should receive an updated form HUD-50058 each year from the receiving PHA. If the initial PHA fails to receive an updated 50058 by the family's annual reexamination date, the initial PHA should contact the receiving PHA to verify the status of the family.

Denial or Termination of Assistance [24 CFR 982.355(c)(9)]

If the initial PHA has grounds for denying or terminating assistance for a portable family that has not been absorbed by the receiving PHA, the initial PHA may act on those grounds at any time. (For PHA policies on denial and termination, see Chapters 3 and 12, respectively.)

10-II.C. RECEIVING PHA ROLE

If a family has a right to lease a unit in the receiving PHA's jurisdiction under portability, the receiving PHA must provide assistance for the family [24 CFR 982.355(10)].

The receiving PHA's procedures and preferences for selection among eligible applicants do not apply, and the receiving PHA's waiting list is not used [24 CFR 982.355(10)]. However, the family's unit, or voucher, size is determined in accordance with the subsidy standards of the receiving PHA [24 CFR 982.355(7)], and the amount of the family's housing assistance payment is determined in the same manner as for other families in the receiving PHA's voucher program [24 CFR 982.355(e)(2)].

Initial Contact with Family

When a family moves into the PHA's jurisdiction under portability, the family is responsible for promptly contacting the PHA and complying with the PHA's procedures for incoming portable families [24 CFR 982.355(c)(3)].

If the voucher issued to the family by the initial PHA has expired, the receiving PHA does not process the family's paperwork but instead refers the family back to the initial PHA [Notice PIH 2008-43].

When a portable family requests assistance from the receiving PHA, the receiving PHA must promptly inform the initial PHA whether the receiving PHA will bill the initial PHA for assistance on behalf of the portable family or will absorb the family into its own program [24 CFR 982.355(c)(5)]. If the PHA initially bills the initial PHA for the family's assistance, it may later decide to absorb the family into its own program [Notice PIH 2008-43]. (See later under "Absorbing a Portable Family" for more on this topic.)

PHA Policy

Within 10 business days after a portable family requests assistance, the receiving PHA will notify the initial PHA whether it intends to bill the receiving PHA on behalf of the portable family or absorb the family into its own program.

If for any reason the receiving PHA refuses to process or provide assistance to a family under the portability procedures, the family must be given the opportunity for an informal review or hearing [Notice PIH 2008-43]. (For more on this topic, see later under "Denial or Termination of Assistance.")

Briefing

HUD allows the receiving PHA to require a briefing for an incoming portable family as long as the requirement does not unduly delay the family's search [Notice PIH 2008-43].

PHA Policy

The PHA will not require the family to attend a briefing. The PHA will provide the family with a briefing packet (as described in Chapter 5) and, in an individual briefing, will orally inform the family about the PHA's payment and subsidy standards, procedures for requesting approval of a unit, the unit inspection process, and the leasing process. The PHA will suggest that the family attend a full briefing at a later date.

Income Eligibility and Reexamination

HUD allows the receiving PHA to conduct its own income reexamination of a portable family [24 CFR 982.355(c)(4)]. However, the receiving PHA may not delay voucher issuance or unit approval until the reexamination process is complete unless the reexamination is necessary to determine that an applicant family is income eligible for admission to the program in the area where the family wishes to lease a unit [Notice PIH 2008-43, 24 CFR 982.201(b)(4)]. The receiving PHA does not redetermine income eligibility for a portable family that was already receiving assistance in the initial PHA's voucher program [24 CFR 982.355(c)(1)].

PHA Policy

For any family moving into its jurisdiction under portability, the PHA will conduct a new reexamination of family income and composition. However, the PHA will not delay issuing the family a voucher for this reason. Nor will the PHA delay approving a unit for the family until the reexamination process is complete unless the family is an applicant and the PHA cannot otherwise confirm that the family is income eligible for admission to the program in the area where the unit is located.

In conducting its own reexamination, the PHA will rely upon any verifications provided by the initial PHA to the extent that they (a) accurately reflect the family's current circumstances and (b) were obtained within the last 120 days. Any new information may be verified by documents provided by the family and adjusted, if necessary, when third party verification is received.

Voucher Issuance

When a family moves into its jurisdiction under portability, the receiving PHA is required to issue the family a voucher [24 CFR 982.355(b)(6)]. The family must submit a request for tenancy approval to the receiving PHA during the term of the receiving PHA's voucher [24 CFR 982.355(c)(6)].

Timing of Voucher Issuance

HUD expects the receiving PHA to issue the voucher within two weeks after receiving the family's paperwork from the initial PHA if the information is in order, the family has contacted the receiving PHA, and the family complies with the receiving PHA's procedures [Notice PIH 2008-43].

PHA Policy

When a family ports into its jurisdiction, the PHA will issue the family a voucher based on the paperwork provided by the initial PHA unless the family's paperwork from the initial PHA is incomplete, the family's voucher from the initial PHA has expired or the family does not comply with the PHA's procedures. The PHA will update the family's information when verification has been completed.

Voucher Term

The term of the receiving PHA's voucher may not expire before the term of the initial PHA's voucher [24 CFR 982.355(c)(6)].

PHA Policy

The receiving PHA's voucher will expire on the same date as the initial PHA's voucher.

Voucher Extensions [24 CFR 982.355(c)(6), Notice 2008-43]

The receiving PHA may provide additional search time to the family beyond the expiration date of the initial PHA's voucher; however, if it does so, it must inform the initial PHA of the extension. It must also bear in mind the billing deadline provided by the initial PHA. Unless willing and able to absorb the family, the receiving PHA should ensure that any voucher expiration date would leave sufficient time to process a request for tenancy approval, execute a HAP contract, and deliver the initial billing to the initial PHA.

PHA Policy

The PHA generally will not extend the term of the voucher that it issues to an incoming portable family unless the PHA plans to absorb the family into its own program, in which case it will follow the policies on voucher extension set forth in section 5-II.E.

The PHA will consider an exception to this policy as a reasonable accommodation to a person with disabilities (see Chapter 2).

Notifying the Initial PHA

The receiving PHA must promptly notify the initial PHA if the family has leased an eligible unit under the program or if the family fails to submit a request for tenancy approval for an eligible unit within the term of the receiving PHA's voucher [24 CFR 982.355(c)(8)]. The receiving PHA is required to use Part II of form HUD-52665, Family Portability Information, for this purpose [24 CFR 982.355(e)(5), Notice PIH 2008-43]. (For more on this topic and the deadline for notification, see below under "Administering a Portable Family's Voucher.")

If an incoming portable family ultimately decides not to lease in the jurisdiction of the receiving PHA but instead wishes to return to the initial PHA's jurisdiction or to search in another jurisdiction, the receiving PHA must refer the family back to the initial PHA. In such a case the voucher of record for the family is once again the voucher originally issued by the initial PHA. Any extension of search time provided by the receiving PHA's voucher is only valid for the family's search in the receiving PHA's jurisdiction [Notice PIH 2008-43].

Administering a Portable Family's Voucher***Initial Billing Deadline***

If a portable family's search for a unit is successful and the receiving PHA intends to administer the family's voucher, the receiving PHA must submit its initial billing notice (Part II of form HUD-52665) (a) no later than 10 business days following the date the receiving PHA **executes** a HAP contract on behalf of the family **and** (b) in time that the notice will be **received** no later than 60 days following the expiration date of the family's voucher issued by the initial PHA [Notice PIH 2008-43]. A copy of the family's form HUD-50058, Family Report, completed by

the receiving PHA must be attached to the initial billing notice. The receiving PHA may send these documents by mail, fax, or e-mail.

PHA Policy

The PHA will send its initial billing notice by fax or e-mail, if necessary, to meet the billing deadline but will also send the notice by regular mail.

If the receiving PHA fails to send the initial billing within 10 business days following the date the HAP contract is executed, it is required to absorb the family into its own program unless (a) the initial PHA is willing to accept the late submission or (b) HUD requires the initial PHA to honor the late submission (e.g., because the receiving PHA is over leased) [Notice PIH 2008-43].

Ongoing Notification Responsibilities [Notice PIH 2008-43, HUD-52665]

Annual Reexamination. The receiving PHA must send the initial PHA a copy of a portable family's updated form HUD-50058 after each annual reexamination for the duration of time the receiving PHA is billing the initial PHA on behalf of the family, regardless of whether there is a change in the billing amount.

PHA Policy

The PHA will send a copy of the updated HUD-50058 by regular mail at the same time the PHA and owner are notified of the reexamination results.

Change in Billing Amount. The receiving PHA is required to notify the initial PHA, using form HUD-52665, of any change in the billing amount for the family as a result of:

- A change in the HAP amount (because of a reexamination, a change in the applicable payment standard, a move to another unit, etc.)
- An abatement or subsequent resumption of the HAP payments
- Termination of the HAP contract
- Payment of a damage/vacancy loss claim for the family
- Termination of the family from the program

The timing of the notice of the change in the billing amount should correspond with the notification to the owner and the family in order to provide the initial PHA with advance notice of the change. Under no circumstances should the notification be later than 10 business days following the effective date of the change in the billing amount. If the receiving PHA fails to send Form HUD-52665 within 10 days of effective date of billing changes, the initial PHA is not responsible for any increase prior to notification.

Late Payments [Notice PIH 2008-43]

If the initial PHA fails to make a monthly payment for a portable family by the fifth business day of the month, the receiving PHA must promptly notify the initial PHA in writing of the deficiency. The notice must identify the family, the amount of the billing payment, the date the billing payment was due, and the date the billing payment was received (if it arrived late). The receiving PHA must send a copy of the notification to the Office of Public Housing (OPH) in the HUD area office with jurisdiction over the receiving PHA. If the initial PHA fails to correct the

problem by the second month following the notification, the receiving PHA may request by memorandum to the director of the OPH with jurisdiction over the receiving PHA that HUD transfer the unit in question. A copy of the initial notification and any subsequent correspondence between the PHAs on the matter must be attached. The receiving PHA must send a copy of the memorandum to the initial PHA. If the OPH decides to grant the transfer, the billing arrangement on behalf of the family ceases with the transfer, but the initial PHA is still responsible for any outstanding payments due to the receiving PHA.

Overpayments [Notice PIH 2008-43]

In all cases where the receiving PHA has received billing payments for billing arrangements no longer in effect, the receiving PHA is responsible for returning the full amount of the overpayment (including the portion provided for administrative fees) to the initial PHA.

In the event that HUD determines billing payments have continued for at least three months because the receiving PHA failed to notify the initial PHA that the billing arrangement was terminated, the receiving PHA must take the following steps:

- Return the full amount of the overpayment, including the portion provided for administrative fees, to the initial PHA.
- Once full payment has been returned, notify the Office of Public Housing in the HUD area office with jurisdiction over the receiving PHA of the date and the amount of reimbursement to the initial PHA.

At HUD's discretion, the receiving PHA will be subject to the sanctions spelled out in Notice PIH 2008-43.

Denial or Termination of Assistance

At any time, the receiving PHA may make a determination to deny or terminate assistance to a portable family for family action or inaction [24 CFR 982.355(c)(9), 24 CFR 982.355(c)(10)].

In the case of a termination, the PHA should provide adequate notice of the effective date to the initial PHA to avoid having to return a payment. In no event should the receiving PHA fail to notify the initial PHA later than 10 business days following the effective date of the termination of the billing arrangement [Notice PIH 2008-43].

PHA Policy

If the PHA elects to deny or terminate assistance for a portable family, the PHA will notify the initial PHA within 10 business days after the informal review or hearing if the denial or termination is upheld. The PHA will base its denial or termination decision on the policies set forth in Chapter 3 or Chapter 12, respectively. The informal review or hearing will be held in accordance with the policies in Chapter 16. The receiving PHA will furnish the initial PHA with a copy of the review or hearing decision.

Absorbing a Portable Family

The receiving PHA may absorb an incoming portable family into its own program when the PHA executes a HAP contract on behalf of the family or at any time thereafter providing that (a) the PHA has funding available under its annual contributions contract (ACC) and (b) absorbing

the family will not result in over leasing [24 CFR 982.355(d)(1), Notice PIH 2008-43].

If the receiving PHA absorbs a family from the point of admission, the admission will be counted against the income targeting obligation of the receiving PHA [24 CFR 982.201(b)(2)(vii)].

If the receiving PHA absorbs a family after providing assistance for the family under a billing arrangement with the initial PHA, HUD encourages the receiving PHA to provide adequate advance notice to the initial PHA to avoid having to return an overpayment. The receiving PHA must specify the effective date of the absorption of the family [Notice PIH 2008-43].

PHA Policy

If the PHA decides to absorb a portable family upon the execution of a HAP contract on behalf of the family, the PHA will notify the initial PHA by the initial billing deadline specified on form HUD-52665. The effective date of the HAP contract will be the effective date of the absorption.

If the PHA decides to absorb a family after that, it will provide the initial PHA with 30 days' advance notice.

Following the absorption of an incoming portable family, the family is assisted with funds available under the consolidated ACC for the receiving PHA's voucher program [24 CFR 982.355(d)], and the receiving PHA becomes the initial PHA in any subsequent moves by the family under portability.

Chapter 11

REEXAMINATIONS

INTRODUCTION

The PHA is required to reexamine each family's income and composition at least annually, and to adjust the family's level of assistance accordingly. Interim reexaminations are also needed in certain situations. This chapter discusses both annual and interim reexaminations, and the recalculation of family share and subsidy that occurs as a result. HUD regulations and PHA policies concerning reexaminations are presented in three parts:

Part I: Annual Reexaminations. This part discusses the process for conducting annual reexaminations.

Part II: Interim Reexaminations. This part details the requirements for families to report changes in family income and composition between annual reexaminations.

Part III: Recalculating Family Share and Subsidy Amount. This part discusses the recalculation of family share and subsidy amounts based on the results of annual and interim reexaminations.

Policies governing reasonable accommodation, family privacy, required family cooperation, and program abuse, as described elsewhere in this plan, apply to both annual and interim reexaminations.

PART I

ANNUAL REEXAMINATIONS [24 CFR 982.516]

11-I.A. OVERVIEW

The PHA must conduct a reexamination of family income and composition at least annually. This includes gathering and verifying current information about family composition, income, and expenses. Based on this updated information, the family's income and rent must be recalculated. This part discusses the schedule for annual reexaminations, the information to be collected and verified, and annual reexamination effective dates.

11-I.B. SCHEDULING ANNUAL REEXAMINATIONS

The PHA must establish a policy to ensure that the annual reexamination for each family is completed *within* a 12-month period, and may require reexaminations more frequently [HCV GB p. 12-1].

PHA Policy

The PHA will begin the annual reexamination process 120 days in advance of its scheduled effective date. Generally, the PHA will schedule annual reexamination effective dates to coincide with the family's anniversary date.

Anniversary date is defined as 12 months from the effective date of the family's last annual reexamination or, during a family's first year in the program, from the effective date of the family's initial examination (admission).

If the family moves to a new unit, the PHA will perform a new annual reexamination.

The PHA also may schedule an annual reexamination for completion prior to the anniversary date for administrative purposes.

Notification of and Participation in the Annual Reexamination Process

The PHA is required to obtain the information needed to conduct annual reexaminations. How that information will be collected is left to the discretion of the PHA. However, PHAs should give tenants who were not provided the opportunity the option to complete Form HUD-92006 at this time [Notice PIH 2009-36].

PHA Policy

Families generally are required to participate in an annual reexamination interview, which must be attended by the head of household, spouse, or co head. If participation in an in-person interview poses a hardship because of a family member's disability, the family should contact the PHA to request a reasonable accommodation (see Chapter 2).

Notification of annual reexamination interviews will be sent by first-class mail and will contain the date, time, and location of the interview. In addition, it will inform the family of the information and documentation that must be brought to the interview.

If the family is unable to attend a scheduled interview, the family should contact the PHA in advance of the interview to schedule a new appointment. If a family does not attend

the scheduled interview, the PHA will send a second notification with a new interview appointment time.

If a family fails to attend two scheduled interviews without PHA approval, or if the notice is returned by the post office with no forwarding address, a notice of termination (see Chapter 12) will be sent to the family's address of record, and to any alternate address provided in the family's file.

An advocate, interpreter, or other assistant may assist the family in the interview process. The family and the PHA must execute a certification attesting to the role and assistance of any such third party.

11-I.C. CONDUCTING ANNUAL REEXAMINATIONS

As part of the annual reexamination process, families are required to provide updated information to the PHA regarding the family's income, expenses, and composition [24 CFR 982.551(b)].

PHA Policy

Families will be asked to bring all required information (as described in the reexamination notice) to the reexamination appointment. The required information will include a PHA-designated reexamination form, an Authorization for the Release of Information/Privacy Act Notice, as well as supporting documentation related to the family's income, expenses, and family composition.

Any required documents or information that the family is unable to provide at the time of the interview must be provided within 10 business days of the interview. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension.

If the family does not provide the required documents or information within the required time frame (plus any extensions), the family will be sent a notice of termination (See Chapter 12).

The information provided by the family generally must be verified in accordance with the policies in Chapter 7. Unless the family reports a change, or the agency has reason to believe a change has occurred in information previously reported by the family, certain types of information that are verified at admission typically do not need to be re-verified on an annual basis. These include:

- Legal identity
- Age
- Social security numbers
- A person's disability status
- Citizenship or immigration status

If adding a new family member to the unit causes overcrowding according to the Housing Quality Standards (HQS) (see Chapter 8), the PHA must issue the family a new voucher, and the

family and PHA must try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, the PHA must terminate the HAP contract in accordance with its terms [24 CFR 982.403].

11-I.D. DETERMINING ONGOING ELIGIBILITY OF CERTAIN STUDENTS [24 CFR 982.552(b)(5)]

Section 327 of Public Law 109-115 established new restrictions on the ongoing eligibility of certain students (both part- and full-time) who are enrolled in institutions of higher education.

If a student enrolled in an institution of higher education is under the age of 24, is not a veteran, is not married, does not have a dependent child, and is not a person with disabilities receiving HCV assistance as of November 30, 2005, the student's eligibility must be reexamined along with the income eligibility of the student's parents on an annual basis. In these cases, both the student and the student's parents must be income eligible for the student to continue to receive HCV assistance. If, however, a student in these circumstances is determined independent from his or her parents in accordance with PHA policy, the income of the student's parents will not be considered in determining the student's ongoing eligibility.

Students who reside with parents in an HCV assisted unit are not subject to this provision. It is limited to students who are receiving assistance on their own, separately from their parents.

PHA Policy

During the annual reexamination process, the PHA will determine the ongoing eligibility of each student who is subject to the eligibility restrictions in 24 CFR 5.612 by reviewing the student's individual income as well as the income of the student's parents. If the student has been determined "independent" from his/her parents based on the policies in Sections 3-II.E and 7-II.E, the parents' income will not be reviewed.

If the student is no longer income eligible based on his/her own income or the income of his/her parents, the student's assistance will be terminated in accordance with the policies in Section 12-I.D.

If the student continues to be income eligible based on his/her own income and the income of his/her parents (if applicable), the PHA will process a reexamination in accordance with the policies in this chapter.

11-I.E. EFFECTIVE DATES

The PHA must establish policies concerning the effective date of changes that result from an annual reexamination [24 CFR 982.516].

PHA Policy

In general, an *increase* in the family share of the rent that results from an annual reexamination will take effect on the family's anniversary date, and the family will be notified at least 30 days in advance.

If less than 30 days remain before the scheduled effective date, the increase will take effect on the first of the month following the end of the 30-day notice period.

If a family moves to a new unit, the increase will take effect on the effective date of the new lease and HAP contract, and no 30-day notice is required.

If the PHA chooses to schedule an annual reexamination for completion prior to

the family's anniversary date for administrative purposes, the effective date will be determined by the PHA, but will always allow for the 30-day notice period.

If the family causes a delay in processing the annual reexamination, *increases* in the family share of the rent will be applied retroactively, to the scheduled effective date of the annual reexamination. The family will be responsible for any overpaid subsidy and may be offered a repayment agreement in accordance with the policies in Chapter 16.

In general, a *decrease* in the family share of the rent that results from an annual reexamination will take effect on the family's anniversary date.

If a family moves to a new unit, the decrease will take effect on the effective date of the new lease and HAP contract.

If the PHA chooses to schedule an annual reexamination for completion prior to the family's anniversary date for administrative purposes, the effective date will be determined by the PHA.

If the family causes a delay in processing the annual reexamination, *decreases* in the family share of the rent will be applied prospectively, from the first day of the month following completion of the reexamination processing.

Delays in reexamination processing are considered to be caused by the family if the family fails to provide information requested by the PHA by the date specified, and this delay prevents the PHA from completing the reexamination as scheduled.

PART II

INTERIM REEXAMINATIONS [24 CFR 982.516]

11-II.A. OVERVIEW

Family circumstances may change throughout the period between annual reexaminations. HUD and PHA policies dictate what kinds of information about changes in family circumstances must be reported, and under what circumstances the PHA must process interim reexaminations to reflect those changes. HUD regulations also permit the PHA to conduct interim reexaminations of income or family composition at any time. When an interim reexamination is conducted, only those factors that have changed are verified and adjusted [HCV GB, p. 12-10].

In addition to specifying what information the family must report, HUD regulations permit the family to request an interim determination if other aspects of the family's income or composition changes. The PHA must complete the interim reexamination within a reasonable time after the family's request.

This part includes HUD and PHA policies describing what changes families are required to report, what changes families may choose to report, and how the PHA will process both PHA- and family-initiated interim reexaminations.

11-II.B. CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION

The PHA must adopt policies prescribing when and under what conditions the family must report changes in family composition. However, due to family obligations under the program, the PHA has limited discretion in this area.

PHA Policy

The PHA will conduct interim reexaminations to account for any changes in household composition that occur between annual reexaminations.

New Family Members Not Requiring Approval

The addition of a family member as a result of birth, adoption, or court-awarded custody does not require PHA approval. However, the family is required to promptly notify the PHA of the addition [24 CFR 982.551(h)(2)].

PHA Policy

The family must inform the PHA of the birth, adoption, or court-awarded custody of a child within 10 business days.

New Family and Household Members Requiring Approval

With the exception of children who join the family as a result of birth, adoption, or court-awarded custody, a family must request PHA approval to add a new family member [24 CFR 982.551(h)(2)] or other household member (live-in aide or foster child) [24 CFR 982.551(h)(4)].

When any new family member is added, the PHA must conduct a reexamination to determine any new income or deductions associated with the additional family member and to make appropriate adjustments in the family share of the rent and the HAP payment [24 CFR

982.516(e)].

If a change in family size causes a violation of Housing Quality Standards (HQS) space standards (see Chapter 8), the PHA must issue the family a new voucher, and the family and PHA must try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, the PHA must terminate the family's HAP contract in accordance with its terms [24 CFR 982.403].

PHA Policy

Families must request PHA approval to add a new family member, live-in aide, foster child, or foster adult. This includes any person not on the lease who is expected to stay in the unit for more than 30 consecutive days or 90 cumulative days within a 12-month period and therefore no longer qualifies as a "guest." Requests must be made in writing and approved by the PHA prior to the individual moving into the unit.

The PHA will not approve the addition of a new family or household member unless the individual meets the PHA's eligibility criteria (see Chapter 3) and documentation requirements (see Chapter 7, Part II).

The PHA will not approve the addition of a foster child or foster adult if it will cause a violation of HQS space standards.

If the PHA determines an individual meets the PHA's eligibility criteria and documentation requirements, the PHA will provide written approval to the family. If the approval of a new family member or live-in aide will cause overcrowding according to HQS standards, the approval letter will explain that the family will be issued a voucher and will be required to move.

If the PHA determines that an individual does not meet the PHA's eligibility criteria or documentation requirements, the PHA will notify the family in writing of its decision to deny approval of the new family or household member and the reasons for the denial.

The PHA will make its determination within 10 business days of receiving all information required to verify the individual's eligibility.

Departure of a Family or Household Member

Families must promptly notify the PHA if any family member no longer lives in the unit

[24 CFR 982.551(h)(3)]. Because household members are considered when determining the family unit (voucher) size [24 CFR 982.402], the PHA also needs to know when any live-in aide, foster child, or foster adult ceases to reside in the unit.

PHA Policy

If a household member ceases to reside in the unit, the family must inform the PHA within 10 business days. This requirement also applies to a family member who has been considered temporarily absent at the point that the family concludes the individual is permanently absent.

If a live-in aide, foster child, or foster adult ceases to reside in the unit, the family must inform the PHA within 10 business days.

11-II.C. CHANGES AFFECTING INCOME OR EXPENSES

Interim reexaminations can be scheduled either because the PHA has reason to believe that changes in income or expenses may have occurred, or because the family reports a change. When a family reports a change, the PHA may take different actions depending on whether the family reported the change voluntarily, or because it was required to do so.

PHA-Initiated Interim Reexaminations

PHA-initiated interim reexaminations are those that are scheduled based on circumstances or criteria defined by the PHA. They are not scheduled because of changes reported by the family.

PHA Policy

The PHA will conduct interim reexaminations in each of the following instances:

For families receiving the Earned Income Disallowance (EID), the PHA will conduct an interim reexamination at the start and conclusion of the second 12 month exclusion period (50 percent phase-in period).

If the family has reported zero income, the PHA will conduct an interim reexamination every 3 months as long as the family continues to report that they have no income.

If at the time of the annual reexamination, it is not feasible to anticipate a level of income for the next 12 months (e.g. seasonal or cyclic income), the PHA will schedule an interim reexamination to coincide with the end of the period for which it is feasible to project income.

If at the time of the annual reexamination, tenant-provided documents were used on a provisional basis due to the lack of third-party verification, and third-party verification becomes available, the PHA will conduct an interim reexamination.

The PHA may conduct an interim reexamination at any time in order to correct an error in a previous reexamination, or to investigate a tenant fraud complaint.

Family-Initiated Interim Reexaminations

The PHA must adopt policies prescribing when and under what conditions the family must report changes in family income or expenses [24 CFR 982.516(c)]. In addition, HUD regulations require that the family be permitted to obtain an interim reexamination any time the family has experienced a change in circumstances since the last determination [24 CFR 982.516(b)(2)].

Required Reporting

HUD regulations give the PHA the freedom to determine the circumstances under which families will be required to report changes affecting income.

PHA Policy

Families are required to report all increases in income, including new employment, within 10 business days of the date the change takes effect.

The PHA will only conduct interim reexaminations for families that qualify for the

earned income disallowance (EID), and only when the EID family's share of rent will change as a result of the increase. In all other cases, the PHA will note the information in the tenant file, but will not conduct an interim reexamination.

Families are not required to report any other changes in income or expenses.

Optional Reporting

The family may request an interim reexamination any time the family has experienced a change in circumstances since the last determination [24 CFR 982.516(b)(2)]. The PHA must process the request if the family reports a change that will result in a reduced family income [HCV GB, p. 12-9].

If a family reports a decrease in income from the loss of welfare benefits due to fraud or non-compliance with a welfare agency requirement to participate in an economic self-sufficiency program, the family's share of the rent will not be reduced [24 CFR 5.615]. For more information regarding the requirement to impute welfare income see Chapter 6.

PHA Policy

If a family reports a change that it was not required to report and that would result in an increase in the family share of the rent, the PHA will note the information in the tenant file, but will not conduct an interim reexamination.

If a family reports a change that it was not required to report and that would result in a decrease in the family share of rent, the PHA will conduct an interim reexamination. See Section 11-II.D. for effective dates.

Families may report changes in income or expenses at any time.

11-II.D. PROCESSING THE INTERIM REEXAMINATION

Method of Reporting

PHA Policy

The family may notify the PHA of changes either orally or in writing. If the family provides oral notice, the PHA may also require the family to submit the changes in writing.

Generally, the family will not be required to attend an interview for an interim reexamination. However, if the PHA determines that an interview is warranted, the family may be required to attend.

Based on the type of change reported, the PHA will determine the documentation the family will be required to submit. The family must submit any required information or documents within 10 business days of receiving a request from the PHA. This time frame may be extended for good cause with PHA approval. The PHA will accept required documentation by mail, by fax, or in person.

Effective Dates

The PHA must establish the time frames in which any changes that result from an interim reexamination will take effect [24 CFR 982.516(d)]. The changes may be applied either retroactively or prospectively, depending on whether there is to be an increase or a decrease in the family share of the rent, and whether the family reported any required information within the required time frames [HCV GB, p. 12-10].

PHA Policy

If the family share of the rent is to *increase*:

The increase generally will be effective on the first of the month following 30 days' notice to the family.

If a family fails to report a change within the required time frames, or fails to provide all required information within the required time frames, the increase will be applied retroactively, to the date it would have been effective had the information been provided on a timely basis. The family will be responsible for any overpaid subsidy and may be offered a repayment agreement in accordance with the policies in Chapter 16.

If the family share of the rent is to *decrease*:

The decrease will be effective on the first day of the month following the month in which the change was reported and all required documentation was submitted. In cases where the change cannot be verified until after the date the change would have become effective, the change will be made retroactively.

PART III

RECALCULATING FAMILY SHARE AND SUBSIDY AMOUNT

11-III.A. OVERVIEW

After gathering and verifying required information for an annual or interim reexamination, the PHA must recalculate the family share of the rent and the subsidy amount, and notify the family and owner of the changes [24 CFR 982.516(d)(2), HCV 12-6 and 12-10]. While the basic policies that govern these calculations are provided in Chapter 6, this part lays out policies that affect these calculations during a reexamination.

11-III.B. CHANGES IN PAYMENT STANDARDS AND UTILITY ALLOWANCES

In order to calculate the family share of the rent and HAP amount correctly, changes in payment standards, subsidy standards, or utility allowances may need to be updated and included in the PHA's calculations.

Specific policies governing how subsidy standards, payment standards, and utility allowances are applied are discussed below.

Payment Standards [24 CFR 982.505]

The family share of the rent and HAP calculations must use the correct payment standard for the family, taking into consideration the family unit size, the size of unit, and the area in which the unit is located [HCV GB, p. 12-5]. See Chapter 6 for information on how to select the appropriate payment standard.

When the PHA changes its payment standards or the family's situation changes, new payment standards are applied at the following times:

- If the PHA's payment standard amount changes during the term of the HAP contract, the date on which the new standard is applied depends on whether the standard has increased or decreased:
 - If the payment standard amount has *increased*, the increased payment standard will be applied at the *first annual* reexamination following the effective date of the increase in the payment standard.
 - If the payment standard amount has *decreased*, the decreased payment standard will be applied at the *second annual* reexamination following the effective date of the decrease in the payment standard.
- If the family moves to a new unit, or a new HAP contract is executed due to changes in the lease (even if the family remains in place) the current payment standard applicable to the family will be used when the new HAP contract is processed.

Subsidy Standards [24 CFR 982.505(c)(4)]

If there is a change in the family unit size that would apply to a family during the HAP contract term, either due to a change in family composition, or a change in the PHA's subsidy standards

(see Chapter 5), the new family unit size must be used to determine the payment standard amount for the family at the family's *first annual* reexamination following the change in family unit size.

Utility Allowances [24 CFR 982.517(d)]

The family share of the rent and HAP calculations must reflect any changes in the family's utility arrangement with the owner, or in the PHA's utility allowance schedule [HCV GB, p. 12-5]. Chapter 16 discusses how utility allowance schedules are established.

When there are changes in the utility arrangement with the owner, the PHA must use the utility allowances in effect at the time the new lease and HAP contract are executed.

At reexamination, the PHA must use the PHA current utility allowance schedule [24 CFR 982.517(d)(2)].

PHA Policy

Revised utility allowances will be applied to a family's rent and subsidy calculations at the first annual reexamination after the allowance is adopted.

11-III.C. NOTIFICATION OF NEW FAMILY SHARE AND HAP AMOUNT

The PHA must notify the owner and family of any changes in the amount of the HAP payment [HUD-52641, HAP Contract]. The notice must include the following information [HCV GB, p. 12-6]:

- The amount and effective date of the new HAP payment
- The amount and effective date of the new family share of the rent
- The amount and effective date of the new tenant rent to owner

The family must be given an opportunity for an informal hearing regarding the PHA's determination of their annual or adjusted income, and the use of such income to compute the housing assistance payment [24 CFR 982.555(a)(1)(i)] (see Chapter 16).

PHA Policy

The notice to the family will include the annual and adjusted income amounts that were used to calculate the family share of the rent and the housing assistance payment. The notice also will state the procedures for requesting an informal hearing.

11-III.D. DISCREPANCIES

During an annual or interim reexamination, the PHA may discover that information previously reported by the family was in error, or that the family intentionally misrepresented information. In addition, the PHA may discover errors made by the PHA. When errors resulting in the overpayment or underpayment of subsidy are discovered, corrections will be made in accordance with the policies in Chapter 13.

Chapter 12

TERMINATION OF ASSISTANCE AND TENANCY

HUD regulations specify the reasons for which a PHA can terminate a family's assistance, and the ways in which such terminations must take place. They also dictate the circumstances under which an owner may terminate the tenancy of an assisted family. This chapter presents the policies that govern voluntary and involuntary terminations of assistance, and termination of tenancy by the owner. It is presented in three parts:

Part I: Grounds for Termination of Assistance. This part discusses various reasons that a family's assistance may be terminated, including voluntary termination by the family, termination because the family no longer qualifies to receive subsidy, and termination by the PHA based on the family's behavior.

Part II: Approach to Termination of Assistance. This part describes the policies that govern how an involuntary termination takes place. It specifies the alternatives that the PHA may consider in lieu of termination, the criteria the PHA must use when deciding what action to take, and the steps the PHA must take when terminating a family's assistance.

Part III: Termination of Tenancy by the Owner. This part presents the policies that govern the owner's right to terminate an assisted tenancy.

PART I: GROUNDS FOR TERMINATION OF ASSISTANCE

12-I.A. OVERVIEW

HUD requires the PHA to terminate assistance for certain offenses and when the family no longer requires assistance. HUD permits the PHA to terminate assistance for certain other actions family members take or fail to take. In addition, a family may decide to stop receiving HCV assistance at any time by notifying the PHA.

12-I.B. FAMILY NO LONGER REQUIRES ASSISTANCE [24 CFR 982.455]

As a family's income increases, the amount of PHA subsidy goes down. If the amount of HCV assistance provided by the PHA drops to zero and remains at zero for 180 consecutive calendar days the family's assistance terminates automatically.

PHA Policy

If a participating family receiving zero assistance experiences a change in circumstances that would cause the HAP payment to rise above zero, the family must notify the PHA of the changed circumstances and request an interim reexamination before the expiration of the 180-day period.

12-I.C. FAMILY CHOOSES TO TERMINATE ASSISTANCE

The family may request that the PHA terminate the family's assistance at any time.

PHA Policy

The request to terminate assistance should be made in writing and signed by the head of household, spouse, or co-head. Before terminating the family's assistance, the PHA will follow the notice requirements in Section 12-II.F.

12-I.D. MANDATORY TERMINATION OF ASSISTANCE

HUD requires the PHA to terminate assistance in the following circumstances.

Eviction [24 CFR 982.552(b)(2), Pub.L. 109-162]

The PHA must terminate assistance whenever a family is evicted from a unit assisted under the HCV program for a serious or repeated violation of the lease. Incidents of actual or threatened violence, dating violence, or stalking may not be construed as serious or repeated violations of the lease by the victim or threatened victim of such violence or stalking.

PHA Policy

A family will be considered *evicted* if the family moves after a legal eviction order has been issued, whether or not physical enforcement of the order was necessary.

If a family moves after the owner has given the family an eviction notice for serious or repeated lease violations but before a legal eviction order has been issued, termination of assistance is not mandatory. However, the PHA will determine whether the family has

committed serious or repeated violations of the lease based on available evidence and may terminate assistance or take any of the alternative measures described in Section 12-II.C and other factors as described in Sections 12-II.E. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate assistance.

Serious and repeated lease violations will include, but not be limited to, nonpayment of rent, disturbance of neighbors, destruction of property, or living or housekeeping habits that cause damage to the unit or premises and criminal activity. Generally, the criteria to be used is whether the reason for the eviction was through no fault of the tenant or guests.

Failure to Provide Consent [24 CFR 982.552(b)(3)]

The PHA must terminate assistance if any family member fails to sign and submit any consent form they are required to sign for a reexamination. See Chapter 7 for a complete discussion of consent requirements.

Failure to Document Citizenship [24 CFR 982.552(b)(4) and [24 CFR 5.514(c)]

The PHA must terminate assistance if (1) a family fails to submit required documentation within the required timeframe concerning any family member's citizenship or immigration status; (2) a family submits evidence of citizenship and eligible immigration status in a timely manner, but United States Citizenship and Immigration Services (USCIS) primary and secondary verification does not verify eligible immigration status of the family; or (3) a family member, as determined by the PHA, has knowingly permitted another individual who is not eligible for assistance to reside (on a permanent basis) in the unit.

For (3) above, such termination must be for a period of at least 24 months. This does not apply to ineligible noncitizens already in the household where the family's assistance has been prorated. See Chapter 7 for a complete discussion of documentation requirements.

Failure to Disclose and Document Social Security Numbers [24 CFR 5.218(c), Notice PIH 2012-10]

The PHA must terminate assistance if a participant family fails to disclose the complete and accurate social security numbers of each household member and the documentation necessary to verify each social security number.

However, if the family is otherwise eligible for continued program assistance, and the PHA determines that the family's failure to meet the SSN disclosure and documentation requirements was due to circumstances that could not have been foreseen and were outside of the family's control, the PHA may defer the family's termination and provide the opportunity to comply with the requirement within a period not to exceed 90 calendar days from the date the PHA determined the family to be noncompliant.

PHA Policy

The PHA will defer the family's termination and provide the family with the opportunity to comply with the requirement for a period of 90 calendar days for circumstances beyond the participant's control such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency, if there is a

reasonable likelihood that the participant will be able to disclose an SSN by the deadline.

Methamphetamine Manufacture or Production [24 CFR 982.553(b)(1)(ii)]

The PHA must terminate assistance if any household member has ever been convicted of the manufacture or production of methamphetamine on the premises of federally-assisted housing.

Failure of Students to Meet Ongoing Eligibility Requirements [24 CFR 982.552(b)(5) and FR 4/10/06]

If a student enrolled at an institution of higher education is under the age of 24, is not a veteran, is not married, does not have dependent children, is not residing with his/her parents in an HCV assisted household, and is not a person with disabilities receiving HCV assistance as of November 30, 2005, the PHA must terminate the student's assistance if, at the time of reexamination, either the student's income or the income of the student's parents (if applicable) exceeds the applicable income limit.

If a participant household consists of both eligible and ineligible students, the eligible students shall not be terminated, but must be issued a voucher to move with continued assistance in accordance with program regulations and PHA policies, or must be given the opportunity to lease in place if the terminated ineligible student members elect to move out of the assisted unit.

Death of the Sole Family Member [24 CFR 982.311(d) and Notice PIH 2010-9]

The PHA must immediately terminate program assistance for deceased single member households.

12-I.E. MANDATORY POLICIES AND OTHER AUTHORIZED TERMINATIONS

Mandatory Policies [24 CFR 982.553(b) and 982.551(l)]

HUD requires the PHA to establish policies that permit the PHA to terminate assistance if the PHA determines that:

Any household member is currently engaged in any illegal use of a drug, or has a pattern of illegal drug use that interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents

Any household member's abuse or pattern of abuse of alcohol may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents

Any household member has violated the family's obligation not to engage in any drug-related criminal activity

Any household member has violated the family's obligation not to engage in violent criminal activity

Use of Illegal Drugs and Alcohol [24 CFR 966.4(l)(5)(i)(B)]

PHA Policy

The lease must provide that a PHA may evict a family when the PHA determines that a household member is illegally using a drug or that a pattern of illegal use of a drug

interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents.

PHA Policy

The PHA will terminate a family's assistance if any household member is currently engaged in any illegal use of a drug, or has a pattern of illegal drug use that interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents.

Currently engaged in is defined as any use of illegal drugs during the previous twelve months.

The PHA will terminate assistance if any household member's abuse or pattern of abuse of alcohol threatens the health, safety, or right to peaceful enjoyment of the premises by other residents. . A pattern of illegal drug use means more than one incident of any use of illegal drugs during the previous twelve months.

The PHA will consider all credible evidence, including but not limited to, any record of arrests, convictions, or eviction of household members related to the use of illegal drugs or abuse of alcohol.

In making its decision to terminate assistance, the PHA will consider alternatives as described in Section 12-II.C and other factors described in Sections 12-II.D and 12-II.E. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate assistance.

Drug-Related and Violent Criminal Activity [24 CFR 5.100]

Drug means a controlled substance as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802).

Drug-related criminal activity is defined by HUD as the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug.

Violent criminal activity means any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage.

PHA Policy

The PHA will terminate a family's assistance if any household member has violated the family's obligation not to engage in any drug-related or violent criminal activity during participation in the HCV program.

The PHA will consider all credible evidence, including but not limited to, any record of arrests and/or convictions of household members related to drug-related or violent criminal activity, and any eviction or notice to evict based on drug-related or violent criminal activity.

In making its decision to terminate assistance, the PHA will consider alternatives as described in Section 12-II.C and other factors described in Sections 12-II.D and 12-II.E. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate assistance.

Other Authorized Reasons for Termination of Assistance [24 CFR 982.552(c), Pub.L. 109-162]

HUD permits the PHA to terminate assistance under a number of other circumstances. It is left to the discretion of the PHA whether such circumstances in general warrant consideration for the termination of assistance. The Violence Against Women Reauthorization Act of 2005 explicitly prohibits PHAs from considering incidents or actual threatened domestic violence, dating violence, or stalking as reasons for terminating the assistance of a victim of such violence.

PHA Policy

The PHA **will not** terminate a family's assistance because of the family's failure to meet its obligations under the Family Self-Sufficiency program.

The PHA **will** terminate a family's assistance if:

The family has failed to comply with any family obligations under the program. See Exhibit 12-1 for a listing of family obligations and related PHA policies.

Any family member has been evicted from federally-assisted housing in the last five years.

Any PHA has ever terminated assistance under the program for any member of the family.

Any family member has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program pursuant to federal or state law.

The family currently owes rent or other amounts to any PHA in connection with the HCV, Certificate, Moderate Rehabilitation or public housing programs.

The family has not reimbursed any PHA for amounts the PHA paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease.

The family has breached the terms of a repayment agreement entered into with the PHA.

A family member has engaged in or threatened violent or abusive behavior toward PHA personnel.

Abusive or violent behavior towards PHA personnel includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.

Threatening refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.

In making its decision to terminate assistance, the PHA will consider alternatives as described in Section 12-II.C and other factors described in Sections 12-II.D and 12-II.E. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate assistance.

Family Absence from the Unit [24 CFR 982.312]

The family may be absent from the unit for brief periods. The PHA must establish a policy on how long the family may be absent from the assisted unit. However, the family may not be absent from the unit for a period of more than 180 consecutive calendar days for any reason. Absence in this context means that no member of the family is residing in the unit.

PHA Policy

If the family is absent from the unit for more than 180 consecutive calendar days, the family's assistance will be terminated. Notice of termination will be sent in accordance with Section 12-II.E.

Insufficient Funding [24 CFR 982.454]

The PHA may terminate HAP contracts if the PHA determines, in accordance with HUD requirements, that funding under the consolidated ACC is insufficient to support continued assistance for families in the program.

PHA Policy

The PHA will determine whether there is sufficient funding to pay for currently assisted families according to the policies in Part VIII of Chapter 16. If the PHA determines there is a shortage of funding, prior to terminating any HAP contracts, the PHA will determine if any other actions can be taken to reduce program costs.

In the event that the PHA decides to stop issuing vouchers as a result of a funding shortfall, and the PHA is not assisting the required number of special purpose vouchers (NED families, HUD-Veterans Affairs Supportive Housing (VASH) families, and family unification program (FUP) families), when the PHA resumes issuing vouchers, the PHA

will issue vouchers first to the special purpose voucher families on its waiting list until it has reached the required number of special purpose vouchers, when applicable.

If after implementing all reasonable cost cutting measures there is not enough funding available to provide continued assistance for current participants, the PHA will terminate HAP contracts as a last resort.

Prior to terminating any HAP contracts, the PHA will inform the local HUD field office. The PHA will terminate the minimum number needed in order to reduce HAP costs to a level within the PHA's annual budget authority.

If the PHA must terminate HAP contracts due to insufficient funding, the PHA will do so in accordance with the following criteria and instructions:

Families comprising the required number of special purpose vouchers, including nonelderly disabled (NED), HUD-Veteran's Affairs Supportive Housing (HUD-VASH), and family unification program (FUP) will be the last to be terminated.

If the SFHA experiences a shortfall in Housing Assistance Payments (HAP) funding as a result of Congressional action through the Federal Appropriations process, the SFHA may implement a series of procedures to ensure that the fiscal solvency of the SFHA is maintained while minimizing the impact on participating families.

The procedures may include but are not limited to:

- Implementing mass rent-reasonableness or re-determination
- Adjusting the Payment Standard
- Adjusting Occupancy Standards to reflect a basic two persons per bedroom regardless of age or sex or relationship policy
- Requesting HUD authority to adjust the percentage of income a family pays for rent
- Not re-issuing turn-over units
- Not absorbing portability clients from jurisdictions with Higher Payment Standards
- Rescinding vouchers for the number of families necessary to meet financial obligations of the Housing Choice Voucher Program. In the event this option is implemented, priority will be given to senior and/or disabled households. Following this exemption, selection will be done by random lottery.

PART II: APPROACH TO TERMINATION OF ASSISTANCE

12-II.A. OVERVIEW

The PHA is required by regulation to terminate a family's assistance if certain program rules are violated. For other types of offenses, the regulations give the PHA the discretion to either terminate the family's assistance or to take another action. This part discusses the various actions the PHA may choose to take when it has discretion, and outlines the criteria the PHA will use to make its decision about whether or not to terminate assistance. It also specifies the requirements for the notice that must be provided before terminating assistance.

12-II.B. METHOD OF TERMINATION [24 CFR 982.552(a)(3)]

The way in which the PHA terminates assistance depends upon individual circumstances. HUD permits the PHA to terminate assistance by:

- Terminating housing assistance payments under a current HAP contract,
- Refusing to approve a request for tenancy or to enter into a new HAP contract, or
- Refusing to process a request for or to provide assistance under portability procedures.

12-II.C. ALTERNATIVES TO TERMINATION OF ASSISTANCE

Change in Household Composition

As a condition of continued assistance, the PHA may require that any household member who participated in or was responsible for an offense no longer resides in the unit [24 CFR 982.552(c)(2)(ii)].

PHA Policy

As a condition of continued assistance, the head of household must certify that the culpable family member has vacated the unit and will not be permitted to visit or to stay as a guest in the assisted unit. The family must present evidence of the former family member's current address upon PHA request.

Repayment of Family Debts

PHA Policy

If a family owes amounts to the PHA, as a condition of continued assistance, the PHA will require the family to repay the full amount or to enter into a repayment agreement, within 30 days of receiving notice from the PHA of the amount owed. See Chapter 16 for policies on repayment agreements.

12-II.D. CRITERIA FOR DECIDING TO TERMINATE ASSISTANCE

Evidence

For criminal activity, HUD permits the PHA to terminate assistance if a *preponderance of the evidence* indicates that a household member has engaged in the activity, regardless of whether the household member has been arrested or convicted [24 CFR 982.553(c)].

PHA Policy

The PHA will use the concept of the preponderance of the evidence as the standard for making all termination decisions.

Preponderance of the evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not. Preponderance of the evidence may not be determined by the number of witnesses, but by the greater weight of all evidence

Consideration of Circumstances [24 CFR 982.552(c)(2)(i)]

The PHA is permitted, but not required, to consider all relevant circumstances when determining whether a family's assistance should be terminated.

PHA Policy

The PHA will consider the following factors when making its decision to terminate assistance:

The seriousness of the case, especially with respect to how it would affect other residents.

The effects that termination of assistance may have on other members of the family who were not involved in the action or failure.

The extent of participation or culpability of individual family members, including whether the culpable family member is a minor or a person with disabilities or (as discussed further in section 12-II.E) a victim of domestic violence, dating violence, or stalking.

The length of time since the violation occurred, the family's recent history and the likelihood of favorable conduct in the future.

In the case of drug or alcohol abuse, whether the culpable household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program or has otherwise been rehabilitated successfully.

The PHA will require the participant to submit evidence of the household member's current participation in or successful completion of a supervised drug or alcohol rehabilitation program, or evidence of otherwise having been rehabilitated successfully.

In the case of program abuse, the dollar amount of the overpaid assistance and

whether or not a false certification was signed by the family.

Reasonable Accommodation [24 CFR 982.552(c)(2)(iv)]

If the family includes a person with disabilities, the PHA's decision to terminate the family's assistance is subject to consideration of reasonable accommodation in accordance with 24 CFR Part 8.

PHA Policy

If a family indicates that the behavior of a family member with a disability is the reason for a proposed termination of assistance, the PHA will determine whether the behavior is related to the disability. If so, upon the family's request, the PHA will determine whether alternative measures are appropriate as a reasonable accommodation. The PHA will only consider accommodations that can reasonably be expected to address the behavior that is the basis of the proposed termination of assistance. See Chapter 2 for a discussion of reasonable accommodation.

12-II.E. TERMINATING THE ASSISTANCE OF DOMESTIC VIOLENCE, DATING VIOLENCE, OR STALKING VICTIMS AND PERPETRATORS [24 CFR 5.2005]

The Violence Against Women Reauthorization Act of 2005 (VAWA) provides that "criminal activity directly relating to domestic violence, dating violence, or stalking, engaged in by a member of a tenant's household or any guest or other person under the tenant's control shall not be a cause for termination of assistance, tenancy, or occupancy rights if the tenant or an immediate member of the tenant's family is the victim or threatened victim of that domestic violence, dating violence, or stalking."

VAWA also gives PHAs the authority to "terminate assistance to any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others, without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is also a tenant or lawful occupant."

VAWA does not limit the authority of the PHA to terminate the assistance of any participant if the PHA "can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property if that tenant is not evicted or terminated from assistance." However, situations where this might be relevant are extremely rare.

PHA Policy

In determining whether a participant who is a victim of domestic violence, dating violence, or stalking is an actual and imminent threat to other tenants or those employed at or providing service to a property, the PHA will consider the following, and any other relevant, factors:

Whether the threat is toward an employee or tenant other than the victim of domestic violence, dating violence, or stalking;

Whether the threat is a physical danger beyond a speculative threat;

Whether the threat is likely to happen within a short period of time;

Whether the threat to other tenants or employees can be eliminated in some other way, such as by helping the victim relocate to a confidential location;

If the tenant wishes to contest the PHA's determination that he or she is an actual and imminent threat to other tenants or employees, the tenant may do so as part of the informal hearing.

Victim Documentation

PHA Policy

When a participant family is facing assistance termination because of the actions of a participant, household member, guest, or other person under the participant's control and a participant or immediate family member of the participant's family claims that she or he is the victim of such actions and that the actions are related to domestic violence, dating violence, or stalking, the PHA will request in writing that the individual submit documentation affirming that claim. The written request will include explicit instructions on where, when, and to whom the documentation must be submitted. It will also state the consequences for failure to submit the documentation by the deadline.

The documentation will consist of a completed and signed form HUD-50066, Certification of Domestic Violence, Dating Violence, or Stalking. In lieu of the certification form, the PHA will accept either of the following forms of documentation:

A police or court record documenting the actual or threatened abuse

Documentation signed by a person who has assisted the victim in addressing domestic violence, dating violence, or stalking, or the effects of such abuse. This person may be an employee, agent, or volunteer of a victim service provider; an attorney; or a medical or other knowledgeable professional. The person signing the documentation must attest under penalty of perjury to the person's belief that the incidents in question are bona fide incidents of abuse. The victim must also sign the documentation.

The PHA reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the individual will suffice.

The individual claiming victim status must submit the requested documentation within 14 business days after receipt of the PHA's written request or must request an extension within that time frame. The PHA may, at its discretion, extend the deadline for 10 business days.

If the individual provides the requested documentation within 14 business days, or any PHA-approved extension, the PHA will reconsider its termination decision in light of the documentation.

If the individual does not provide the requested documentation within 14 business days, or any PHA-approved extension, the PHA will proceed with termination of the family's assistance in accordance with applicable law, program regulations, and the policies in this plan.

Terminating the Assistance of a Domestic Violence Perpetrator [24 CFR 5.2005(c)]

Although VAWA provides assistance termination protection for victims of domestic violence, it does not provide protection for perpetrators. VAWA gives the PHA the explicit authority to “terminate assistance to any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others...without terminating assistance to, or otherwise penalizing the victim of such violence who is also a tenant or lawful occupant.” This authority is not dependent on a bifurcated lease or other eviction action by an owner against an individual family member. Further, this authority supersedes any local, state, or other federal law to the contrary. However, if the PHA chooses to exercise this authority, it must follow any procedures prescribed by HUD or by applicable local, state, or federal law regarding termination of assistance [Pub.L. 109-271]. This means that the PHA must follow the same rules when terminating assistance to an individual as it would when terminating the assistance of an entire family [3/16/07 *Federal Register* notice on the applicability of VAWA to HUD programs].

PHA Policy

The PHA will terminate assistance to a family member if the PHA determines that the family member has committed criminal acts of physical violence against other family members or others. This action will not affect the assistance of the remaining, nonculpable family members.

In making its decision, the PHA will consider all credible evidence, including, but not limited to, a signed certification (form HUD-50066) or other documentation of abuse submitted to the PHA by the victim in accordance with this section. The PHA will also consider the factors in section 12-II.D. Upon such consideration, the PHA may, on a case-by-case basis, choose not to terminate the assistance of the culpable family member.

If the PHA does terminate the assistance of the culpable family member, it will do so in accordance with applicable law, HUD regulations, and the policies in this plan.

PHA Confidentiality Requirements [24 CFR 5.2007(a)(1)(v)]

All information provided to the PHA regarding domestic violence, dating violence, or stalking, including the fact that an individual is a victim of such violence or stalking, must be retained in confidence and may neither be entered into any shared data base nor provided to any related entity, except to the extent that the disclosure (a) is requested or consented to by the individual in writing, (b) is required for use in an eviction proceeding, or (c) is otherwise required by applicable law.

PHA Policy

If disclosure is required for use in an eviction proceeding or is otherwise required by applicable law, the PHA will inform the victim before disclosure occurs so that safety risks can be identified and addressed.

12-II.F. TERMINATION NOTICE [HCV GB, p. 15-7]

If a family’s assistance is to be terminated, whether voluntarily or involuntarily, the PHA must give the family and the owner written notice that specifies:

The reasons for which assistance has been terminated

The effective date of the termination

The family's right to an informal hearing as described in Chapter 16

If a criminal record is the basis of the termination, a copy of the record must accompany the notice. A copy of the criminal record also must be provided to the subject of the record [24 CFR 982.553(d)].

PHA Policy

When termination is initiated by the PHA, the notice to terminate will be sent to the family and the owner at least 30 calendar days prior to the effective date of the termination. However, if a family vacates the unit without informing the PHA, 30 day's notice will not be given. In these cases, the notice to terminate will be sent at the time the PHA learns the family has vacated the unit.

When a family requests to be terminated from the program they must do so in writing to the PHA (see section 12-I.C.). The PHA will then send a confirmation notice to the family and the owner within 10 business days of the family's request, but no later than the termination effective date (as requested by the family).

Notice of Termination Based on Citizenship Status [24 CFR 5.514 (c) and (d)]

The PHA must terminate assistance if (1) a family fails to submit required documentation within the required timeframe concerning any family member's citizenship or eligible immigration status; (2) evidence of citizenship and eligible immigration status is submitted timely, but USCIS primary and secondary verification does not verify eligible immigration status of a family; or (3) the PHA determines that a family member has knowingly permitted another individual who is not eligible for assistance to reside (on a permanent basis) in the unit. For (3) above, such termination must be for a period of at least 24 months.

The notice of termination must advise the family of the reasons their assistance is being terminated, that they may be eligible for proration of assistance, the criteria and procedures for obtaining relief under the provisions for preservation of families, that they have the right to request an appeal to the USCIS of the results of secondary verification of immigration status and to submit additional documentation or a written explanation in support of the appeal, and that they have the right to request an informal hearing with the PHA either upon completion of the USCIS appeal or in lieu of the USCIS appeal. Informal hearing procedures are contained in Chapter 16.

PHA Policy

The notice to terminate will be sent to the family and the owner at least 30 calendar days prior to the effective date of the termination.

12-II.G. HOW TERMINATION OF ASSISTANCE AFFECTS THE HAP CONTRACT AND LEASE

When the family's assistance is terminated, the lease and HAP contract terminate automatically [Form HUD-52641].

The owner may offer the family a separate unassisted lease [HCV GB, p. 15-8].

PART III: TERMINATION OF TENANCY BY THE OWNER

12-III.A. OVERVIEW

Termination of an assisted tenancy is a matter between the owner and the family; the PHA is not directly involved. However, the owner is under some constraints when terminating an assisted tenancy and the reasons for which a tenancy is terminated dictate whether assistance also will be terminated.

12-III.B. GROUNDS FOR OWNER TERMINATION OF TENANCY [24 CFR 982.310 and Form HUD-52641-A, Tenancy Addendum, Pub.L. 109-162]

During the term of the lease, the owner is not permitted to terminate the tenancy except for serious or repeated violations of the lease, certain violations of state or local law, or other good cause.

Serious or Repeated Lease Violations

The owner is permitted to terminate the family's tenancy for serious or repeated violations of the terms and conditions of the lease, including failure to pay rent or other amounts due under the lease, except when the violations are related to incidents of actual or threatened domestic violence, dating violence, or stalking against that participant. This includes failure to pay rent or other amounts due under the lease. However, the PHA's failure to make a HAP payment to the owner is not a violation of the lease between the family and the owner.

Violation of Federal, State, or Local Law

The owner is permitted to terminate the tenancy if a family member violates federal, state, or local law that imposes obligations in connection with the occupancy or use of the premises.

Criminal Activity or Alcohol Abuse

The owner may terminate tenancy during the term of the lease if any *covered person*, meaning any member of the household, a guest or another person under the tenant's control commits any of the following types of criminal activity (for applicable definitions see 24 CFR 5.100):

Any criminal activity that threatens the health or safety of, or the right to peaceful enjoyment of the premises by, other residents (including property management staff residing on the premises);

Any criminal activity that threatens the health or safety of, or the right to peaceful enjoyment of their residences by, persons residing in the immediate vicinity of the premises;

Any violent criminal activity on or near the premises; or

Any drug-related criminal activity on or near the premises.

The owner may terminate tenancy during the term of the lease if any member of the household is:

Fleeing to avoid prosecution, custody, or confinement after conviction for a crime or an attempt to commit a crime that is a felony under the laws of the place from which the individual flees, or that, in the case of the State of New Jersey, is a high misdemeanor; or

Violating a condition of probation or parole imposed under federal or state law.

The owner may terminate tenancy for criminal activity by a household member in accordance with this section if the owner determines that the household member has committed the criminal activity, regardless of whether the household member has been arrested or convicted for such activity.

The owner may terminate tenancy during the term of the lease if any member of the household has engaged in abuse of alcohol that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents.

Evidence of Criminal Activity

The owner may terminate tenancy and evict by judicial action a family for criminal activity by a covered person if the owner determines they have engaged in the criminal activity, regardless of arrest or conviction and without satisfying the standard of proof used for a criminal conviction, except in certain incidents where the criminal activity directly relates to domestic violence, dating violence, or stalking and the tenant or an immediate member of the tenant's family is the victim or threatened victim of the domestic violence, dating violence, or stalking. (See Section 12-II.E.).

Other Good Cause

During the initial lease term, the owner may not terminate the tenancy for "other good cause" unless the owner is terminating the tenancy because of something the family did or failed to do.

During the initial lease term or during any extension term, other good cause includes the disturbance of neighbors, destruction of property, or living or housekeeping habits that cause damage to the unit or premises.

After the initial lease term, "other good cause" for termination of tenancy by the owner includes:

Failure by the family to accept the offer of a new lease or revision;

The owner's desire to use the unit for personal or family use, or for a purpose other than as a residential rental unit; or

A business or economic reason for termination of the tenancy (such as sale of the property, renovation of the unit, or desire to lease the unit at a higher rent) subject to local, state and federal laws.

After the initial lease term, the owner may give the family notice at any time, in accordance with the terms of the lease.

Note that "other good cause" does **not** include vacating a property that has been foreclosed upon during the lease term prior to the sale of that property. However, the new owner of the property may terminate the tenancy effective on the date of transfer of the unit if the owner will occupy the unit as a primary residence and has provided the tenant a notice to vacate at least 90 days

before the effective date of such notice [Notice PIH 2010-49]. Further information on the protections afforded to tenants in the event of foreclosure can be found in Section 13-II.G.

12-III.C. EVICTION [24 CFR 982.310(e) and (f) and Form HUD-52641-A, Tenancy Addendum]

The owner must give the tenant a written notice that specifies the grounds for termination of tenancy during the term of the lease. The tenancy does not terminate before the owner has given this notice, and the notice must be given at or before commencement of the eviction action.

The notice of grounds may be included in, or may be combined with, any owner eviction notice to the tenant.

Owner eviction notice means a notice to vacate, or a complaint or other initial pleading used under state or local law to commence an eviction action. The owner may only evict the tenant from the unit by instituting a court action. The owner must give the PHA a copy of any eviction notice at the same time the owner notifies the family. The family is also required to give the PHA a copy of any eviction notice (see Chapter 5).

PHA Policy

If the eviction action is finalized in court, the owner must provide the PHA with documentation related to the eviction, including notice of the eviction date, as soon as possible, but no later than 5 business days following the court-ordered eviction.

12-III.D. DECIDING WHETHER TO TERMINATE TENANCY [24 CFR 982.310(h), 24 CFR 982.310(h)(4)]

An owner who has grounds to terminate a tenancy is not required to do so, and may consider all of the circumstances relevant to a particular case before making a decision. These might include:

The nature of the offending action

The seriousness of the offending action;

The effect on the community of the termination, or of the owner's failure to terminate the tenancy;

The extent of participation by the leaseholder in the offending action;

The effect of termination of tenancy on household members not involved in the offending activity;

The demand for assisted housing by families who will adhere to lease responsibilities;

The extent to which the leaseholder has shown personal responsibility and taken all reasonable steps to prevent or mitigate the offending action;

The effect of the owner's action on the integrity of the program.

The owner may require a family to exclude a household member in order to continue to reside in the assisted unit, where that household member has participated in or been culpable for action or failure to act that warrants termination.

In determining whether to terminate tenancy for illegal use of drugs or alcohol abuse by a household member who is no longer engaged in such behavior, the owner may consider whether such household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program, or has otherwise been rehabilitated successfully (42 U.S.C. 13661). For this purpose, the owner may require the tenant to submit evidence of the household member's current participation in, or successful completion of, a supervised drug or alcohol rehabilitation program or evidence of otherwise having been rehabilitated successfully.

The owner's termination of tenancy actions must be consistent with the fair housing and equal opportunity provisions in 24 CFR 5.105.

An owner's decision to terminate tenancy for incidents related to domestic violence, dating violence, or stalking is limited by the Violence Against Women Reauthorization Act of 2005 (VAWA). (See Section 12-II.E.)

12-III.E. EFFECT OF TENANCY TERMINATION ON THE FAMILY'S ASSISTANCE

If a termination is not due to a serious or repeated violation of the lease, and if the PHA has no other grounds for termination of assistance, the PHA may issue a new voucher so that the family can move with continued assistance (see Chapter 10).

EXHIBIT 12-1: STATEMENT OF FAMILY OBLIGATIONS
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Following is a listing of a participant family's obligations under the HCV program:

- The family must supply any information that the PHA or HUD determines to be necessary, including submission of required evidence of citizenship or eligible immigration status.
- The family must supply any information requested by the PHA or HUD for use in a regularly scheduled reexamination or interim reexamination of family income and composition.
- The family must disclose and verify social security numbers and sign and submit consent forms for obtaining information.
- Any information supplied by the family must be true and complete.
- The family is responsible for any Housing Quality Standards (HQS) breach by the family caused by failure to pay tenant-provided utilities or appliances, or damages to the dwelling unit or premises beyond normal wear and tear caused by any member of the household or guest.

PHA Policy

The security deposit may be used for repair of damages to the premises, exclusive of ordinary wear and tear, caused by the tenant or by a guest or licensee of the tenant. (California Civil Code section 1950.5)

- The family must allow the PHA to inspect the unit at reasonable times and after reasonable notice, as described in Chapter 8 of this plan.
- The family must not commit any serious or repeated violation of the lease.

PHA Policy

The PHA will determine if a family has committed serious or repeated violations of the lease based on available evidence, including but not limited to, a court-ordered eviction, or an owner's notice to evict.

Serious and repeated lease violations will include, but not be limited to, nonpayment of rent, disturbance of neighbors, destruction of property, or living or housekeeping habits that cause damage to the unit or premises and criminal activity. Generally, the criteria to be used is whether the reason for the eviction was through no fault of the tenant or guests.

- The family must notify the PHA and the owner before moving out of the unit or terminating the lease.

PHA Policy

The family must comply with lease requirements regarding written notice to the owner. The family must provide written notice to the PHA at the same time the owner is notified.

- The family must promptly give the PHA a copy of any owner eviction notice.
- The family must use the assisted unit for residence by the family. The unit must be the family's only residence.

- The composition of the assisted family residing in the unit must be approved by the PHA. The family must promptly notify the PHA in writing of the birth, adoption, or court-awarded custody of a child. The family must request PHA approval to add any other family member as an occupant of the unit.

PHA Policy

The request to add a family member must be submitted in writing and approved prior to the person moving into the unit. The PHA will determine eligibility of the new member in accordance with the policies in Chapter 3.

- The family must promptly notify the PHA in writing if any family member no longer lives in the unit.
- If the PHA has given approval, a foster child or a live-in aide may reside in the unit. The PHA has the discretion to adopt reasonable policies concerning residency by a foster child or a live-in aide, and to define when PHA consent may be given or denied. For policies related to the request and approval/disapproval of foster children, foster adults, and live-in aides, see Chapter 3 (Sections I.K and I.M), and Chapter 11 (Section II.B).
- The family must not sublease the unit, assign the lease, or transfer the unit.

PHA Policy

Subleasing includes receiving payment to cover rent and utility costs by a person living in the unit who is not listed as a family member.

- The family must supply any information requested by the PHA to verify that the family is living in the unit or information related to family absence from the unit.
- The family must promptly notify the PHA when the family is absent from the unit.

PHA Policy

Notice is required under this provision only when all family members will be absent from the unit for an extended period. An extended period is defined as any period greater than 30 calendar days. Written notice must be provided to the PHA at the start of the extended absence.

- The family must pay utility bills and provide and maintain any appliances that the owner is not required to provide under the lease [Form HUD-52646, Voucher].
- The family must not own or have any interest in the unit, (other than in a cooperative and owners of a manufactured home leasing a manufactured home space).
- Family members must not commit fraud, bribery, or any other corrupt or criminal act in connection with the program. (See Chapter 14, Program Integrity for additional information).
- Family members must not engage in drug-related criminal activity or violent criminal activity or other criminal activity that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises. See Chapter 12 for HUD and PHA policies related to drug-related and violent criminal activity.

- Members of the household must not engage in abuse of alcohol in a way that threatens the health, safety or right to peaceful enjoyment of the other residents and persons residing in the immediate vicinity of the premises. See Chapter 12 for a discussion of HUD and PHA policies related to alcohol abuse.
- An assisted family or member of the family must not receive HCV program assistance while receiving another housing subsidy, for the same unit or a different unit under any other federal, state or local housing assistance program.
- A family must not receive HCV program assistance while residing in a unit owned by a parent, child, grandparent, grandchild, sister or brother of any member of the family, unless the PHA has determined (and has notified the owner and the family of such determination) that approving rental of the unit, notwithstanding such relationship, would provide reasonable accommodation for a family member who is a person with disabilities. [Form HUD-52646, Voucher]

Chapter 13

OWNERS

INTRODUCTION

Owners play a central role in the HCV program by supplying decent, safe, and sanitary housing for participating families.

The term “owner” refers to any person or entity with the legal right to lease or sublease a unit to a participant in the HCV program [24 CFR 982.4(b)]. The term “owner” includes a principal or other interested party [24 CFR 982.453; 24 CFR 982.306(f)], such as a designated agent of the owner.

Owners have numerous responsibilities under the program, including screening and leasing to families, maintaining the dwelling unit, enforcing the lease, and complying with various contractual obligations. However, this chapter is not meant to be an overview of all aspects of owner participation in the HCV program.

The chapter is organized in two parts:

Part I: Owners in the HCV Program. This part discusses the role of an owner in the PHA’s HCV program and highlights key owner rights and responsibilities.

Part II: HAP Contracts. This part explains provisions of the HAP contract and the relationship between the PHA and the owner as expressed in the HAP contract.

For detailed information about HCV program responsibilities and processes, including PHA policies in key areas, owners will need to refer to several other chapters in this plan. Where appropriate, Chapter 13 will reference the other chapters.

PART I. OWNERS IN THE HCV PROGRAM

13-I.A. OWNER RECRUITMENT AND RETENTION [HCV GB, pp. 2-4 to 2-6]

Recruitment

PHAs are responsible for ensuring that very low income families have access to all types and ranges of affordable housing in the PHA's jurisdiction, particularly housing outside areas of poverty or minority concentration. A critical element in fulfilling this responsibility is for the PHA to ensure that a sufficient number of owners, representing all types and ranges of affordable housing in the PHA's jurisdiction, are willing to participate in the HCV program.

To accomplish this objective, PHAs must identify and recruit new owners to participate in the program.

PHA Policy

The PHA will conduct owner outreach to ensure that owners are familiar with the program and its advantages. The PHA will actively recruit property owners with property located outside areas of poverty and minority concentration. These outreach strategies will include:

Distributing printed material about the program to property owners and/or managers

Contacting property owners and/or managers by phone or in-person

Holding owner recruitment/information meetings at least once a year

Participating in community based organizations comprised of private property and apartment owners and managers

Developing working relationships with owners and real estate brokers associations

Outreach strategies will be monitored for effectiveness, and adapted accordingly.

Retention

In addition to recruiting owners to participate in the HCV program, the PHA must also provide the kind of customer service that will encourage participating owners to remain active in the program.

PHA Policy

All PHA activities that may affect an owner's ability to lease a unit will be processed as rapidly as possible, in order to minimize vacancy losses for owners.

The PHA will provide owners with a handbook that explains the program, including HUD and PHA policies and procedures, in easy-to-understand language.

The PHA will give special attention to helping new owners succeed through activities such as:

Providing the owner with a designated PHA contact person.

Coordinating inspection and leasing activities between the PHA, the owner, and the family.

Initiating telephone contact with the owner to explain the inspection process, and providing an inspection booklet and other resource materials about HUD housing quality standards.

Providing other written information about how the program operates, including answers to frequently asked questions.

Additional services may be undertaken on an as-needed basis, and as resources permit.

13-I.B. BASIC HCV PROGRAM REQUIREMENTS

HUD requires the PHA to aid families in their housing search by providing the family with a list of landlords or other parties known to the PHA who may be willing to lease a unit to the family, or to help the family find a unit. Although the PHA cannot maintain a list of owners that are pre-qualified to participate in the program, owners may indicate to the PHA their willingness to lease a unit to an eligible HCV family, or to help the HCV family find a unit [24 CFR 982.301(b)(11)].

PHA Policy

The PHA will refer potential participants to www.gosection8.com to search for potential housing.

When a family approaches an owner to apply for tenancy, the owner is responsible for screening the family and deciding whether to lease to the family, just as the owner would with any potential tenant. The PHA has no liability or responsibility to the owner or other persons for the family's behavior or suitability for tenancy. See chapters 3 and 9 for more detail on tenant family screening policies and process.

If the owner is willing, the family and the owner must jointly complete a Request for Tenancy Approval (RTA, Form HUD 52517), which constitutes the family's request for assistance in the specified unit, and which documents the owner's willingness to lease to the family and to follow the program's requirements. When submitted to the PHA, this document is the first step in the

process of obtaining approval for the family to receive the financial assistance it will need in order to occupy the unit. Also submitted with the RTA is a copy of the owner's proposed dwelling lease, including the HUD-required Tenancy Addendum (Form HUD-52641-A). See Chapter 9 for more detail on request for tenancy approval policies and process.

HUD regulations stipulate that an assisted tenancy can be approved only under certain conditions.

The owner must be qualified to participate in the program [24 CFR 982.306]. Some owners are precluded from participating in the program, or from renting to a particular family, either because of their past history with this or another federal housing program, or because of certain conflicts of interest. Owner qualifications are discussed later in this chapter.

The selected unit must be of a type that is eligible for the program [24 CFR 982.305(a)]. Certain types of dwelling units cannot be assisted under the HCV program. Other types may be assisted under certain conditions. In addition, the owner must document legal ownership of the specified unit. See chapter 9 for more detail on unit eligibility policies and process.

The selected unit must meet HUD's Housing Quality Standards (HQS) and/or equivalent state or local standards approved by HUD [24 CFR 982.305(a)]. The PHA will inspect the owner's dwelling unit at various stages of HCV program participation, to ensure that the unit continues to meet HQS requirements. See chapter 8 for a discussion of the HQS standards, as well as the process for HQS inspections at initial lease-up and throughout the family's tenancy.

The PHA must determine that the cost of the unit is reasonable [24 CFR 982.305(a)]. The rent must be reasonable in relation to comparable unassisted units in the area and must not be in excess of rents charged by the owner for comparable, unassisted units on the premises. See chapter 8 for a discussion of requirements and policies on rent reasonableness, rent comparability and the rent reasonableness determination process.

At initial lease-up of a unit, the PHA must determine that the share of rent to be paid by the family does not exceed 40 percent of the family's monthly adjusted income [24 CFR 982.305(a)]. See chapter 6 for a discussion of the calculation of family income, family share of rent and HAP.

The dwelling lease must comply with all program requirements [24 CFR 982.308]. Owners are encouraged to use their standard leases when renting to an assisted family. However, the HCV program requires that the Tenancy Addendum, which helps standardize the tenancy requirements for all assisted families, be added word-for-word to that lease. See chapter 9 for a discussion of the dwelling lease and tenancy addendum, including lease terms and provisions.

The PHA and the owner enter into a formal contractual relationship by executing the Housing Assistance Payment (HAP) Contract (Form HUD-52641). The HAP contract format is prescribed by HUD. See chapter 9 for a discussion of the HAP contract execution process. Specific HAP contract provisions and responsibilities are discussed in Part II of Chapter 13.

13-I.C. OWNER RESPONSIBILITIES [24 CFR 982.452]

The basic owner responsibilities in the HCV program are outlined in the regulations as follows:

- Performing all of the owner's obligations under the Housing Assistance Payments (HAP) contract and the lease
- Performing all management and rental functions for the assisted unit, including selecting a voucher-holder to lease the unit, and deciding if the family is suitable for tenancy of the unit
- Maintaining the unit in accordance with the Housing Quality Standards (HQS), including performance of ordinary and extraordinary maintenance
- Complying with equal opportunity requirements
- Preparing and furnishing to the PHA information required under the HAP contract
- Collecting from the family any security deposit, the tenant's contribution to rent (that part of rent to owner not covered by the housing assistance payment from the PHA), and any charges for unit damage by the family.
- Enforcing tenant obligations under the dwelling lease
- Paying for utilities and services (unless paid by the family under the lease)
- Making modifications to a dwelling unit occupied or to be occupied by a disabled person [24 CFR 100.203]
- Comply with the Violence Against Women Reauthorization Act of 2005 (VAWA) when screening and terminating tenants.

13-I.D. OWNER QUALIFICATIONS

The PHA does not formally approve an owner to participate in the HCV program. However, there are a number of criteria where the PHA may deny approval of an assisted tenancy based on past owner behavior, conflict of interest, or other owner-related issues. No owner has a right to participate in the HCV program [24 CFR 982.306(e)].

Owners Barred from Participation [24 CFR 982.306(a) and (b)]

The PHA must not approve the assisted tenancy if the PHA has been informed that the owner has been debarred, suspended, or subject to a limited denial of participation under 24 CFR part 24. HUD may direct the PHA not to approve a tenancy request if a court or administrative agency

has determined that the owner violated the Fair Housing Act or other federal equal opportunity requirements, or if such an action is pending.

Leasing to Relatives [24 CFR 982.306(d), HCV GB p. 11-2]

The PHA must not approve an RTA if the owner is the parent, child, grandparent, grandchild, sister, or brother of any member of the family. The PHA may make an exception as a reasonable accommodation for a family member with a disability. The owner is required to certify that no such relationship exists. This restriction applies at the time that the family receives assistance under the HCV program for occupancy of a particular unit. Current contracts on behalf of owners and families that are related may continue, but any new leases or contracts for these families may not be approved.

Conflict of Interest [24 CFR 982.161; HCV GB p. 8-19]

The PHA must not approve a tenancy in which any of the following classes of persons has any interest, direct or indirect, during tenure or for one year thereafter:

- Any present or former member or officer of the PHA (except a participant commissioner)
- Any employee of the PHA, or any contractor, subcontractor or agent of the PHA, who formulates policy or who influences decisions with respect to the programs
- Any public official, member of a governing body, or State or local legislator, who exercises functions or responsibilities with respect to the programs
- Any member of the Congress of the United States

HUD may waive the conflict of interest requirements, except for members of Congress, for good cause. The PHA must submit a waiver request to the appropriate HUD Field Office for determination.

Any waiver request submitted by the PHA must include [HCV Guidebook pp.11-2 and 11-3]:

- Complete statement of the facts of the case;
- Analysis of the specific conflict of interest provision of the HAP contract and justification as to why the provision should be waived;
- Analysis of and statement of consistency with state and local laws. The local HUD office, the PHA, or both parties may conduct this analysis. Where appropriate, an opinion by the state's attorney general should be obtained;
- Opinion by the local HUD office as to whether there would be an appearance of impropriety if the waiver were granted;
- Statement regarding alternative existing housing available for lease under the HCV program or other assisted housing if the waiver is denied;

- If the case involves a hardship for a particular family, statement of the circumstances and discussion of possible alternatives;
- If the case involves a public official or member of the governing body, explanation of his/her duties under state or local law, including reference to any responsibilities involving the HCV program;
- If the case involves employment of a family member by the PHA or assistance under the HCV program for an eligible PHA employee, explanation of the responsibilities and duties of the position, including any related to the HCV program;
- If the case involves an investment on the part of a member, officer, or employee of the PHA, description of the nature of the investment, including disclosure/divestiture plans.

Where the PHA has requested a conflict of interest waiver, the PHA may not execute the HAP contract until HUD has made a decision on the waiver request.

PHA Policy

In considering whether to request a conflict of interest waiver from HUD, the PHA will consider factors the reasons for waiving the requirement; consistency with state and local laws; the existence of alternative housing available to families; the individual circumstances of a particular family; the specific duties of individuals whose positions present a possible conflict of interest; the nature of any financial investment in the property and plans for disclosure/divestiture; and the possible appearance of impropriety.

Owner Actions That May Result in Disapproval of a Tenancy Request [24 CFR 982.306(c)]

HUD regulations permit the PHA, at the PHA's discretion, to refuse to approve a request for tenancy if the owner has committed any of a number of different actions.

If the PHA disapproves a request for tenancy because an owner is not qualified, it may not terminate the HAP contract for any assisted families that are already living in the owner's properties unless the owner has violated the HAP contract for those units [HCV GB p. 11-4].

PHA Policy

The PHA will refuse to approve a request for tenancy if the PHA becomes aware that any of the following are true:

The owner has violated obligations under a HAP contract under Section 8 of the 1937 Act (42 U.S.C. 1437f);

The owner has committed fraud, bribery or any other corrupt or criminal act in connection with any federal housing program;

The owner has engaged in any drug-related criminal activity or any violent criminal activity;

The owner has a history or practice of non-compliance with the HQS for units leased under the tenant-based programs, or with applicable housing standards for units leased with project-based Section 8 assistance or leased under any other federal housing program;

The owner has a history or practice of failing to terminate tenancy of tenants of units assisted under Section 8 or any other federally assisted housing program for activity engaged in by the tenant, any member of the household, a guest or another person under the control of any member of the household that: (i) Threatens the right to peaceful enjoyment of the premises by other residents; (ii) Threatens the health or safety of other residents, of employees of the PHA, or of owner employees or other persons engaged in management of the housing; (iii) Threatens the health or safety of, or the right to peaceful enjoyment of their residences, by persons residing in the immediate vicinity of the premises; or (iv) Is drug-related criminal activity or violent criminal activity;

The owner has a history or practice of renting units that fail to meet state or local housing codes; or

The owner has not paid state or local real estate taxes, fines, or assessment.

In considering whether to disapprove owners for any of the discretionary reasons listed above, the PHA will consider any mitigating factors. Such factors may include, but are not limited to, the seriousness of the violation in relation to program requirements, the impact on the ability of families to lease units under the program, health and safety of participating families, among others. Upon consideration of such circumstances, the PHA may, on a case-by-case basis, choose to approve an owner.

Legal Ownership of Unit

The following represents PHA policy on legal ownership of a dwelling unit to be assisted under the HCV program.

PHA Policy

The PHA will only enter into a contractual relationship with the legal owner of a qualified unit. No tenancy will be approved without acceptable documentation of legal ownership (e.g., deed of trust, proof of taxes for most recent year).

13-I.E. NON-DISCRIMINATION [HAP Contract – Form HUD-52641]

The owner must not discriminate against any person because of race, color, religion, sex, national origin, age, familial status, or disability, in connection with any actions or responsibilities under the HCV program and the HAP contract with the PHA.

The owner must cooperate with the PHA and with HUD in conducting any equal opportunity compliance reviews and complaint investigations in connection with the HCV program and the HAP contract with the PHA.

See Chapter 2 for a more thorough discussion of Fair Housing and Equal Opportunity requirements in the HCV program.

PART II. HAP CONTRACTS

13-II.A. OVERVIEW

The HAP contract represents a written agreement between the PHA and the owner of the dwelling unit occupied by a HCV assisted family. The contract spells out the owner's responsibilities under the program, as well as the PHA's obligations. Under the HAP contract, the PHA agrees to make housing assistance payments to the owner on behalf of a specific family occupying a specific unit.

The HAP contract is used for all HCV program tenancies except for assistance under the Section 8 homeownership program, and assistance to families that own a manufactured home and lease the space. See chapter 15 for a discussion of any special housing types included in the PHA's HCV program.

If the PHA has given approval for the family of the assisted tenancy, the owner and the PHA execute the HAP contract. See chapter 9 for a discussion of the leasing process, including provisions for execution of the HAP contract.

13-II.B. HAP CONTRACT CONTENTS

The HAP contract format is required by HUD, specifically Housing Assistance Payment (HAP) Contract, Form HUD-52641.

The HAP contract contains three parts.

Part A of the contract includes basic **contract information** about the name of the tenant family, address of the contract unit, names of all household members, first and last dates of initial lease term, amount of initial monthly rent to owner, amount of initial housing assistance payment, utilities and appliances to be supplied by owner and tenant, signatures of PHA and owner [HCV Guidebook, pp 11-10 and 11-11].

Part B is the body of the contract. It describes in detail program requirements affecting the owner and owner roles and responsibilities under the HCV program. Most of the requirements contained in Part B of the HAP contract are outlined elsewhere in this plan. Topics addressed in Part B include:

- Lease of Contract Unit
- Maintenance, Utilities, and Other Services
- Term of HAP Contract
- Provision and Payment of Utilities and Appliances
- Rent to Owner: Reasonable Rent
- PHA Payment to Owner
- Prohibition of Discrimination

- Owner's Breach of HAP Contract
- PHA and HUD Access to Premises and Owner's Records
- Exclusion of Third Party Rights
- Conflict of Interest
- Assignment of the HAP Contract
- Written Notices
- Entire Agreement Interpretation

Part C of the contract includes the Tenancy Addendum (Form HUD-52641-A). The addendum sets forth the tenancy requirements for the program and the composition of the household, as approved by the PHA. The owner must sign the HUD Tenancy Addendum with the prospective tenant, and the tenant has the right to enforce the Tenancy Addendum against the owner. The terms of the Tenancy Addendum prevail over any other provisions of the lease.

13-II.C. HAP CONTRACT PAYMENTS

General

During the term of the HAP contract, and subject to the provisions of the HAP contract, the PHA must make monthly HAP payments to the owner on behalf of the family, at the beginning of each month. If a lease term begins after the first of the month, the HAP payment for the first month is prorated for a partial month.

The amount of the HAP payment is determined according to the policies described in Chapter 6, and is subject to change during the term of the HAP contract. The PHA must notify the owner and the family in writing of any changes in the HAP payment.

HAP payments can be made only during the lease term, and only while the family is residing in the unit.

The monthly HAP payment by the PHA is credited toward the monthly rent to owner under the family's lease. The total of the rent paid by the tenant, plus the PHA HAP payment, should be equal to the rent specified in the lease (the rent to owner).

The family is not responsible for payment of the HAP payment, and the PHA is not responsible for payment of the family share of rent.

The family's share of the rent cannot be more than the difference between the total rent to the owner and the HAP payment. The owner may not demand or accept any rent payment from the tenant in excess of this maximum [24 CFR 982.451(b)(4)]. The owner may not charge the tenant extra amounts for items customarily included in rent in the locality, or provided at no additional cost to unsubsidized tenants in the premises [24 CFR 982.510(c)]. See chapter 9 for a discussion

of separate, non-lease agreements for services, appliances and other items that are not included in the lease.

If the owner receives any excess HAP from the PHA, the excess amount must be returned immediately. If the PHA determines that the owner is not entitled to all or a portion of the HAP, the PHA may deduct the amount of overpayment from any amounts due to the owner, including amounts due under any other Section 8 HCV contract. See Chapter 16 for additional detail on owner reimbursement of HAP overpayments.

Owner Certification of Compliance

Unless the owner complies with all provisions of the HAP contract, the owner is not entitled to receive housing assistance payments under the HAP contract [HAP Contract – Form HUD-52641].

By endorsing the monthly check from the PHA, the owner certifies to compliance with the terms of the HAP contract. This includes certification that the owner is maintaining the unit and premises in accordance with HQS; that the contract unit is leased to the tenant family and, to the best of the owner's knowledge, the family resides in the unit as the family's only residence; the rent to owner does not exceed rents charged by the owner for comparable unassisted units on the premises; and that the owner does not receive (other than rent to owner) any additional payments or other consideration for rent of the contract unit during the HAP term.

Late HAP Payments [24 CFR 982.451(a)(5)]

The PHA is responsible for making HAP payments promptly when due to the owner, in accordance with the terms of the HAP contract. After the first two calendar months of the HAP contract term, the HAP contract provides for penalties if the PHA fails to make the HAP payment on time.

Penalties for late HAP payments can only be imposed if 1) the penalties are in accordance with generally accepted local rental market practices and law governing penalties for late payment by tenants; 2) it is the owner's normal business practice to charge late payment penalties for both assisted and unassisted families; and 3) the owner charges the assisted family for late payment of the family's share of the rent.

The PHA is not required to pay a late payment penalty if HUD determines that the payment is late for reasons beyond the PHA's control. In addition, late payment penalties are not required if the PHA intentionally delays or denies payment as a remedy to an owner breach of the HAP contract [HCV Guidebook p. 11-7].

Termination of HAP Payments [24 CFR 982.311(b)]

The PHA must continue making housing assistance payments to the owner in accordance with the HAP contract as long as the tenant continues to occupy the unit and the HAP contract is not violated.

HAP payments terminate when the HAP contract terminates or when the tenancy is terminated in accordance with the terms of the lease.

If the owner has initiated eviction proceedings against the family and the family continues to reside in the unit, the PHA must continue to make housing assistance payments to the owner until the owner has obtained a court judgment or other process allowing the owner to evict the tenant.

PHA Policy

The owner must inform the PHA when the owner has initiated eviction proceedings against the family and the family continues to reside in the unit.

The owner must inform the PHA when the owner has obtained a court judgment or other process allowing the owner to evict the tenant, and provide the PHA with a copy of such judgment or determination.

After the owner has obtained a court judgment or other process allowing the owner to evict the tenant, the PHA will continue to make HAP payments to the owner until the family actually moves from the unit or until the family is physically evicted from the unit, whichever is earlier. The owner must inform the PHA of the date when the family actually moves from the unit or the family is physically evicted from the unit.

13-II.D. BREACH OF HAP CONTRACT [24 CFR 982.453]

Any of the following actions by the owner constitutes a breach of the HAP contract:

- If the owner violates any obligations under the HAP contract including failure to maintain the unit in accordance with HQS
- If the owner has violated any obligation under any other HAP contract under Section 8
- If the owner has committed fraud, bribery or any other corrupt or criminal act in connection with any federal housing program
- For projects with mortgages insured by HUD or loans made by HUD, if the owner has failed to comply with the regulations for the applicable program; or if the owner has committed fraud, bribery or any other corrupt or criminal act in connection with the mortgage or loan
- If the owner has engaged in drug-related criminal activity
- If the owner has committed any violent criminal activity

If the PHA determines that a breach of the HAP contract has occurred, it may exercise any of its rights and remedies under the HAP contract.

The PHA rights and remedies against the owner under the HAP contract include recovery of any HAP overpayment, suspension of housing assistance payments, abatement or reduction of the housing assistance payment, termination of the payment or termination the HAP contract. The PHA may also obtain additional relief by judicial order or action.

The PHA must notify the owner of its determination and provide in writing the reasons for the determination. The notice may require the owner to take corrective action by an established deadline. The PHA must provide the owner with written notice of any reduction in housing assistance payments or the termination of the HAP contract.

PHA Policy

Before the PHA invokes a remedy against an owner, the PHA will evaluate all information and documents available to determine if the contract has been breached.

If relevant, the PHA will conduct an audit of the owner's records pertaining to the tenancy or unit.

If it is determined that the owner has breached the contract, the PHA will consider all of the relevant factors including the seriousness of the breach, the effect on the family, the owner's record of compliance and the number and seriousness of any prior HAP contract violations.

13-II.E. HAP CONTRACT TERM AND TERMINATIONS

The term of the HAP contract runs concurrently with the term of the dwelling lease [24 CFR 982.451(a)(2)], beginning on the first day of the initial term of the lease and terminating on the last day of the term of the lease, including any lease term extensions.

The HAP contract and the housing assistance payments made under the HAP contract terminate if [HCV Guidebook pp.11-4 and 11-5, pg. 15-3]:

- The owner or the family terminates the lease;
- The lease expires;
- The PHA terminates the HAP contract;
- The PHA terminates assistance for the family;
- The family moves from the assisted unit. In this situation, the owner is entitled to keep the housing assistance payment for the month when the family moves out of the unit.
- 180 calendar days have elapsed since the PHA made the last housing assistance payment to the owner;
- The family is absent from the unit for longer than the maximum period permitted by the PHA;
- The Annual Contributions Contract (ACC) between the PHA and HUD expires
- The PHA elects to terminate the HAP contract.

PHA Policy

The PHA may elect to terminate the HAP contract in each of the following situations:

Available program funding is not sufficient to support continued assistance for families in the program [24 CFR 982.454];

The unit does not meet HQS size requirements due to change in family composition [24 CFR 982.403] – see chapter 8;

The unit does not meet HQS [24 CFR 982.404] – see chapter 8;

The family breaks up [HUD Form 52641] – see chapter 3;

The owner breaches the HAP contract [24 CFR 982.453(b)] – see Section 13-II.D.

If the PHA terminates the HAP contract, the PHA must give the owner and the family written notice. The notice must specify the reasons for the termination and the effective date of the termination. Once a HAP contract is terminated, no further HAP payments may be made under that contract [HCV Guidebook pg.15-4].

PHA Policy

In all cases, the HAP contract terminates at the end of the calendar month that follows the calendar month in which the PHA gives written notice to the owner. The owner is not entitled to any housing assistance payment after this period, and must return to the PHA any housing assistance payment received after this period.

If the family moves from the assisted unit into a new unit, even if the new unit is in the same building or complex as the assisted unit, the HAP contract for the assisted unit terminates. A new HAP contract would be required [HCV GB, p. 11-17].

When the family moves from an assisted unit into a new unit, the term of the HAP contract for the new unit may begin in the same month in which the family moves out of its old unit. This is not considered a duplicative subsidy [HCV GB, p. 8-22].

13-II.F. CHANGE IN OWNERSHIP / ASSIGNMENT OF THE HAP CONTRACT [HUD-52641]

The HAP contract cannot be assigned to a new owner without the prior written consent of the PHA.

An owner under a HAP contract must notify the PHA in writing prior to a change in the legal ownership of the unit. The owner must supply all information as requested by the PHA.

Prior to approval of assignment to a new owner, the new owner must agree to be bound by and comply with the HAP contract. The agreement between the new owner and the former owner must be in writing and in a form that the PHA finds acceptable. The new owner must provide the PHA with a copy of the executed agreement.

PHA Policy

Assignment of the HAP contract will be approved only if the new owner is qualified to become an owner under the HCV program according to the policies in Section 13-I.D. of this chapter.

The PHA must receive a signed, written request from the existing owner stating the name and address of the new HAP payee and the effective date of the assignment in order to change the HAP payee under an outstanding HAP contract.

Within 10 business days of receiving the owner's request, the PHA will inform the current owner in writing whether the assignment may take place.

The new owner must provide a written certification to the PHA that includes:

A copy of the escrow statement or other document showing the transfer of title and recorded deed;

A copy of the owner's IRS Form W-9, Request for Taxpayer Identification Number and Certification, or the social security number of the new owner;

The effective date of the HAP contract assignment;

A written agreement to comply with the terms of the HAP contract; and

Confirmation that the new owner is not a prohibited relative.

If the new owner does not agree to an assignment of the HAP contract, or fails to provide the necessary documents, the PHA will terminate the HAP contract with the old owner. If the new owner wants to offer the family a new lease, and the family elects to stay with continued assistance, the PHA will process the leasing in accordance with the policies in chapter 9.

13-II.G. FORECLOSURE [HUD-52641 and Notice PIH 2010-49]

Families receiving HCV assistance are entitled to certain protections set forth under the Protecting Tenants at Foreclosure Act (PTFA). Specifically, the HAP contract now contains language stating that in the case of any foreclosure, the immediate successor in interest in the property pursuant to the foreclosure will assume such interest subject to the lease between the prior owner and the tenant, and to the HAP contract between the prior owner and the PHA for the occupied unit. This provision of the HAP contract does not affect any state or local law that provides longer time periods or other additional protections for tenants.

If the PHA learns that a property is in foreclosure, it must take the following actions:

- Make all reasonable efforts to determine the status of the foreclosure and ownership of the property. (Further guidance on how to obtain this information can be found in Notice PIH 2010-49.)
- Continue to make payments to the original owner until ownership legally transfers in accordance with the HAP contract.
- Attempt to obtain a written acknowledgement of the assignment of the HAP contract from the successor in interest. The written agreement should include a request for owner information, such as a tax identification number, and payment instructions from the new owner. Even if the new owner does not acknowledge the assignment of the HAP contract in writing, the assignment is still effective by operation of law.

- Inform the tenant that they must continue to pay rent in accordance with the lease, and if the successor in interest refuses to accept payment or cannot be identified, the tenant should pay rent into escrow. Failure to pay rent may constitute an independent ground for eviction.
- Inform the tenant in the event that the PHA is unable to make HAP payments to the successor in interest due an action or inaction by the successor that prevents such payments (e.g., rejection of payments or failure to maintain the property according to HQS), or due to an inability to identify the successor. The PHA should also refer the tenant, as needed, to the local legal aid office in order to ensure adequate protection of the tenant's rights and enforcement of the successor in interest's performance under the HAP contract.
- Make reasonable inquiries to determine whether the unit, in addition to having a tenant receiving HCV assistance, will be or has been assisted under the Neighborhood Stabilization Program (NSP). (For further guidance on cases in where the units have been assisted under the NSP, see Notice PIH 2010-49.)

PHAs are also required to notify HCV applicants who have been issued a voucher, participant heads of household, and current and prospective owners of HCV-assisted housing of the protections afforded to tenants under the PTFA.

PHA Policy

The PHA will provide all HCV applicants that have been issued a voucher with information regarding the PTFA at admission (see Section 5-I.B) and to participant heads of household at annual reexamination.

The PHA will provide information regarding the PTFA to prospective owners when they begin their participation in the HCV program, and to current HCV owners one time with the monthly HAP.

Note that the foreclosure provision of the HAP contract and additional tenant protections under the Protecting Tenants at Foreclosure Act will sunset December 31, 2014.

See Section 12-III.B for a discussion of foreclosure as it pertains to owner termination of tenancy.

Chapter 14

PROGRAM INTEGRITY

INTRODUCTION

The PHA is committed to ensuring that subsidy funds made available to the PHA are spent in accordance with HUD requirements.

This chapter covers HUD and PHA policies designed to prevent, detect, investigate, and resolve instances of program abuse or fraud. It also describes the actions that will be taken in the case of unintentional errors and omissions.

Part I: Preventing, Detecting, and Investigating Errors and Program Abuse. This part presents PHA policies related to preventing, detecting, and investigating errors and program abuse.

Part II: Corrective Measures and Penalties. This part describes the corrective measures the PHA must and may take when errors or program abuses are found.

PART I: PREVENTING, DETECTING, AND INVESTIGATING ERRORS AND PROGRAM ABUSE

14-I.A. PREVENTING ERRORS AND PROGRAM ABUSE

HUD created the Enterprise Income Verification (EIV) system to provide PHAs with a powerful tool for preventing errors and program abuse. PHAs are required to use the EIV system in its entirety in accordance with HUD administrative guidance [24 CFR 5.233]. PHAs are further required to:

- Provide applicants and participants with form HUD-52675, “Debts Owed to PHAs and Terminations”
- Require all adult members of an applicant or participant family to acknowledge receipt of form HUD-52675 by signing a copy of the form for retention in the family file

PHA Policy

The PHA anticipates that the vast majority of families, owners, and PHA employees intend to and will comply with program requirements and make reasonable efforts to avoid errors.

To ensure that the PHA’s HCV program is administered effectively and according to the highest ethical and legal standards, the PHA will employ a variety of techniques to ensure that both errors and intentional program abuse are rare.

The PHA will discuss program compliance and integrity issues during the voucher briefing sessions described in Chapter 5.

The PHA will provide each applicant and participant with a copy of “Is Fraud Worth It?” (form HUD-1141-OIG), which explains the types of actions a family must avoid and the penalties for program abuse.

The PHA will provide each applicant and participant with a copy of “What You Should Know about EIV,” a guide to the Enterprise Income Verification (EIV) system published by HUD as an attachment to Notice PIH 2010-19. In addition, the PHA will require the head of each household to acknowledge receipt of the guide by signing a copy for retention in the family file.

The PHA will place a warning statement about the penalties for fraud (as described in 18 U.S.C. 1001 and 1010) on key PHA forms and form letters that request information from a family or owner.

PHA staff will be required to review and explain the contents of all HUD- and PHA-required forms prior to requesting family member signatures.

The PHA will require first-time owners (or their agents) to participate in a briefing session on HAP contract requirements.

The PHA will provide each PHA employee with the necessary training on program rules and the organization’s standards of conduct and ethics.

For purposes of this chapter the term *error* refers to an unintentional error or omission. *Program abuse or fraud* refers to a single act or pattern of actions that constitute a false statement, omission, or concealment of a substantial fact, made with the intent to deceive or mislead.

14-I.B. DETECTING ERRORS AND PROGRAM ABUSE

In addition to taking steps to prevent errors and program abuse, the PHA will use a variety of activities to detect errors and program abuse.

Quality Control and Analysis of Data

Under the Section 8 Management Assessment Program (SEMAP), HUD requires the PHA to review a random sample of tenant records annually to determine if the records conform to program requirements and to conduct quality control inspections of a sample of units to ensure HQS compliance [24 CFR, Part 985]. (See Chapter 16 for additional information about SEMAP requirements).

PHA Policy

In addition to the SEMAP quality control requirements, the PHA will employ a variety of methods to detect errors and program abuse.

The PHA routinely will use available sources of up-front income verification, including HUD's EIV system, to compare with family-provided information.

At each annual reexamination, current information provided by the family will be compared to information provided at the last annual reexamination to identify inconsistencies and incomplete information.

The PHA will compare family-reported income and expenditures to detect possible unreported income.

Independent Audits and HUD Monitoring

OMB Circular A-133 requires all PHAs that expend \$500,000 or more in federal awards annually to have an independent audit (IPA). In addition, HUD conducts periodic on-site and automated monitoring of PHA activities and notifies the PHA of errors and potential cases of program abuse.

PHA Policy

The PHA will use the results reported in any IPA or HUD monitoring reports to identify potential program abuses as well as to assess the effectiveness of the PHA's error detection and abuse prevention efforts.

Individual Reporting of Possible Errors and Program Abuse

PHA Policy

The PHA will encourage staff, program participants, and the public to report possible program abuse.

14-I.C. INVESTIGATING ERRORS AND PROGRAM ABUSE

When the PHA Will Investigate

PHA Policy

The PHA will review all referrals, specific allegations, complaints, and tips from any source including other agencies, companies, and individuals, to determine if they warrant investigation. In order for the PHA to investigate, the allegation must contain at least one independently-verifiable item of information, such as the name of an employer or the name of an unauthorized household member.

The PHA will investigate inconsistent information related to the family that is identified through file reviews and the verification process.

Consent to Release of Information [24 CFR 982.516]

The PHA may investigate possible instances of error or abuse using all available PHA and public records. If necessary, the PHA will require HCV families to give consent to the release of additional information.

Analysis and Findings

PHA Policy

The PHA will base its evaluation on a preponderance of the evidence collected during its investigation.

Preponderance of the evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence that as a whole shows that the fact sought to be proved is more probable than not. Preponderance of evidence may not be determined by the number of witnesses, but by the greater weight of all evidence

For each investigation the PHA will determine (1) whether an error or program abuse has occurred, (2) whether any amount of money is owed the PHA, and (3) what corrective measures or penalties will be assessed.

Consideration of Remedies

All errors and instances of program abuse must be corrected prospectively. Whether the PHA will enforce other corrective actions and penalties depends upon the nature of the error or program abuse.

PHA Policy

In the case of family-caused errors or program abuse, the PHA will take into consideration (1) the seriousness of the offense and the extent of participation or culpability of individual family members, (2) any special circumstances surrounding the case, (3) any mitigating circumstances related to the disability of a family member, (4) the effects of a particular remedy on family members who were not involved in the offense.

In the case of owner-caused errors or program abuse, the PHA will take into consideration (1) the seriousness of the offense, (2) the length of time since the violation has occurred, and (3) the effects of a particular remedy on family members who were not involved in the offense.

Notice and Appeals

PHA Policy

The PHA will inform the relevant party in writing of its findings and remedies within 30 calendar days of the conclusion of the investigation. The notice will include (1) a description of the error or program abuse, (2) the basis on which the PHA determined the error or program abuses, (3) the remedies to be employed, and (4) the family's right to appeal the results through the informal review or hearing process, if applicable (see Chapter 16).

PART II: CORRECTIVE MEASURES AND PENALTIES

14-II.A. SUBSIDY UNDER- OR OVERPAYMENTS

A subsidy under- or overpayment includes (1) an incorrect housing assistance payment to the owner, (2) an incorrect family share established for the family, and (3) an incorrect utility reimbursement to a family.

Corrections

Whether the incorrect subsidy determination is an overpayment or underpayment of subsidy, the PHA must promptly correct the HAP, family share, and any utility reimbursement prospectively.

PHA Policy

Increases in the family share will be implemented only after the family has received 30 days' notice.

Any decreases in family share will become effective the first of the month following the discovery of the error.

Reimbursement

Whether the family or owner is required to reimburse the PHA or the PHA is required to make retroactive subsidy payments to the owner or family depends upon which party is responsible for the incorrect subsidy payment and whether the action taken was an error or program abuse. Policies regarding reimbursement are discussed in the three sections that follow.

14-II.B. FAMILY-CAUSED ERRORS AND PROGRAM ABUSE

Family obligations and general administrative requirements for participating in the program are discussed throughout this plan. This section deals specifically with errors and program abuse by family members.

An incorrect subsidy determination caused by a family generally would be the result of incorrect reporting of family composition, income, assets, or expenses, but also would include instances in which the family knowingly allows the PHA to use incorrect information provided by a third party.

Family Reimbursement to PHA [HCV GB pp. 22-12 to 22-13]

PHA Policy

In the case of family-caused errors or program abuse, the family will be required to repay any excess subsidy received. The PHA may, but is not required to, offer the family a repayment agreement in accordance with Chapter 16. If the family fails to repay the excess subsidy, the PHA will terminate the family's assistance in accordance with the policies in Chapter 12.

PHA Reimbursement to Family [HCV GB p. 22-12]

PHA Policy

The PHA will not reimburse the family for any underpayment of assistance when the

underpayment clearly is caused by the family.

Prohibited Actions

An applicant or participant in the HCV program must not knowingly:

- Make a false statement to the PHA [Title 18 U.S.C. Section 1001].
- Commit fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program [24 CFR 982.552(c)(iv)].

PHA Policy

Any of the following will be considered evidence of family program abuse:

Payment to the owner in excess of amounts authorized by the PHA for rent, security deposit, and additional services

Offering bribes or illegal gratuities to the PHA Board of Commissioners, employees, contractors, or other PHA representatives

Offering payments or other incentives to the owner or a third party as an inducement for the third party to make false or misleading statements to the PHA on the family's behalf

Use of a false name or the use of falsified, forged, or altered documents

Intentional misreporting of family information or circumstances (e.g. income, family composition)

Omitted facts that were obviously known by a family member (e.g., not reporting employment income)

Admission of program abuse by an adult family member

The PHA may determine other actions to be program abuse based upon a preponderance of the evidence, as defined earlier in this chapter.

Penalties for Program Abuse

In the case of program abuse caused by a family the PHA may, at its discretion, impose any of the following remedies.

- The PHA may require the family to repay excess subsidy amounts paid by the PHA, as described earlier in this section.
- The PHA may require, as a condition of receiving or continuing assistance, that a culpable family member not reside in the unit. See policies in Chapter 3 (for applicants) and Chapter 12 (for participants).
- The PHA may deny or terminate the family's assistance following the policies set forth in Chapter 3 and Chapter 12 respectively.
- The PHA may refer the family for state or federal criminal prosecution as described in section 14-II.E.

14-II.C. OWNER-CAUSED ERROR OR PROGRAM ABUSE

Owner requirements that are part of the regular process of offering, leasing, and maintaining a unit (e.g., HQS compliance, fair housing) are addressed in the appropriate chapters of this plan. This section focuses on errors and program abuse by owners.

An incorrect subsidy determination caused by an owner generally would be the result of an incorrect owner statement about the characteristics of the assisted unit (e.g., the number of bedrooms, which utilities are paid by the family). It also includes accepting duplicate housing assistance payments for the same unit in the same month, or after a family no longer resides in the unit.

Owner Reimbursement to the PHA

In all cases of overpayment of subsidy caused by the owner, the owner must repay to the PHA any excess subsidy received. The PHA may recover overpaid amounts by withholding housing assistance payments due for subsequent months, or if the debt is large, the PHA may allow the owner to pay in installments over a period of time [HCV GB p. 22-13].

PHA Policy

In cases where the owner has received excess subsidy, the PHA will require the owner to repay the amount owed in accordance with the policies in Section 16-IV.B.

Prohibited Owner Actions

An owner participating in the HCV program must not:

- Make any false statement to the PHA [Title 18 U.S.C. Section 1001].
- Commit fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program [24 CFR 982.453(a)(3)] including:

PHA Policy

Any of the following will be considered evidence of owner program abuse:

Charging the family rent above or below the amount specified by the PHA

Charging a security deposit other than that specified in the family's lease

Charging the family for services that are provided to unassisted tenants at no extra charge

Knowingly accepting housing assistance payments for any month(s) after the family has vacated the unit

Knowingly accepting incorrect or excess housing assistance payments

Offering bribes or illegal gratuities to the PHA Board of Commissioners, employees, contractors, or other PHA representatives

Offering payments or other incentives to an HCV family as an inducement for the family to make false or misleading statements to the PHA

Residing in the unit with an assisted family

Remedies and Penalties

When the PHA determines that the owner has committed program abuse, the PHA may take any of the following actions:

- Require the owner to repay excess housing assistance payments, as discussed earlier in this section and in accordance with the policies in Chapter 16.
- Terminate the HAP contract (See Chapter 13).
- Bar the owner from future participation in any PHA programs.
- Refer the case to state or federal officials for criminal prosecution as described in section 14-II.E.

14-II.D. PHA-CAUSED ERRORS OR PROGRAM ABUSE

The responsibilities and expectations of PHA staff with respect to normal program administration are discussed throughout this plan. This section specifically addresses actions of a PHA staff member that are considered errors or program abuse related to the HCV program. Additional standards of conduct may be provided in the PHA personnel policy.

PHA-caused incorrect subsidy determinations include (1) failing to correctly apply HCV rules regarding family composition, income, assets, and expenses, (2) assigning the incorrect voucher size to a family, and (3) errors in calculation.

Repayment to the PHA

Neither a family nor an owner is required to repay an overpayment of subsidy if the error or program abuse is caused by PHA staff [HCV GB. 22-12].

PHA Reimbursement to Family or Owner

The PHA must reimburse a family for any underpayment of subsidy, regardless of whether the underpayment was the result of staff-caused error or staff or owner program abuse. Funds for this reimbursement must come from the PHA's administrative fee reserves [HCV GB p. 22-12].

Prohibited Activities

PHA Policy

Any of the following will be considered evidence of program abuse by PHA staff:

Failing to comply with any HCV program requirements for personal gain

Failing to comply with any HCV program requirements as a result of a conflict of interest relationship with any applicant, participant, or owner

Seeking or accepting anything of material value from applicants, participating families, vendors, owners, contractors, or other persons who provide services or materials to the PHA

Disclosing confidential or proprietary information to outside parties

Gaining profit as a result of insider knowledge of PHA activities, policies, or

practices

Misappropriating or misusing HCV funds

Destroying, concealing, removing, or inappropriately using any records related to the HCV program

Committing any other corrupt or criminal act in connection with any federal housing program

14-II.E. CRIMINAL PROSECUTION

PHA Policy

When the PHA determines that program abuse by an owner, family, or PHA staff member has occurred and the amount of overpaid subsidy meets or exceeds the threshold for prosecution under local or state law, the PHA will refer the matter to the appropriate entity for prosecution. When the amount of overpaid assistance meets or exceeds the federal threshold, the case will also be referred to the HUD Office of Inspector General (OIG).

Other criminal violations related to the HCV program will be referred to the appropriate local, state, or federal entity.

14-II.F. FRAUD AND PROGRAM ABUSE RECOVERIES

The PHA may retain a portion of program fraud losses that the PHA recovers from a family or owner through litigation, court order, or a repayment agreement [24 CFR 982.163].

The PHA must be the principal party initiating or sustaining the action to recover amounts due from tenants that are due as a result of fraud and abuse. 24 CFR 792.202 permits the PHA to retain the greater of:

- 50 percent of the amount it actually collects from a judgment, litigation (including settlement of a lawsuit) or an administrative repayment agreement, or
- Reasonable and necessary costs that the PHA incurs related to the collection including costs of investigation, legal fees, and agency collection fees.

The family must be afforded the opportunity for an informal hearing in accordance with requirements in 24 CFR 982.555.

If HUD incurs costs on behalf of the PHA related to the collection, these costs must be deducted from the amount retained by the PHA.

Chapter 15

SPECIAL HOUSING TYPES

[24 CFR 982 Subpart M]

INTRODUCTION

The PHA may permit a family to use any of the special housing types discussed in this chapter. However, the PHA is not required to permit families receiving assistance in its jurisdiction to use these housing types, except that PHAs must permit use of any special housing type if needed as a reasonable accommodation for a person with a disability. The PHA also may limit the number of families who receive HCV assistance in these housing types and cannot require families to use a particular housing type. No special funding is provided for special housing types.

PHA Policy

The PHAs policy is to permit all special housing types as modified by this chapter, and that the general requirements of the HCV program apply to special housing types.

Special housing types include single room occupancy (SRO), congregate housing, group homes, shared housing, cooperative housing, manufactured homes where the family owns the home and leases the space, and homeownership [24 CFR 982.601].

Special housing types include single room occupancy (SRO), congregate housing, group homes, shared housing, cooperative housing, manufactured homes (including manufactured home space rental) where the family owns the home and leases the space, and homeownership [24 CFR 982.601].

This chapter consists of the following seven parts. Each part contains a description of the housing type and any special requirements associated with it.

Part I: Single Room Occupancy

Part II: Congregate Housing

Part III: Group Homes

Part IV: Shared Housing

Part V: Cooperative Housing

Part VI: Manufactured Homes (including manufactured home space rental)

Part VII: Homeownership

PART I: SINGLE ROOM OCCUPANCY

[24 CFR 982.602 through 982.605]

15-I.A. OVERVIEW

A single room occupancy (SRO) unit provides living and sleeping space for the exclusive use of the occupant but requires the occupant to share sanitary and/or food preparation facilities with others. More than one person may not occupy an SRO unit. HCV regulations do not limit the number of units in an SRO facility, but the size of a facility may be limited by local ordinances.

When providing HCV assistance in an SRO unit, a separate lease and HAP contract are executed for each assisted person, and the standard form of the HAP contract is used.

15-I.B. PAYMENT STANDARD, UTILITY ALLOWANCE, AND HAP CALCULATION

The payment standard for SRO housing is 75 percent of the 0-bedroom payment standard amount on the PHA's payment standard schedule.

The utility allowance for an assisted person residing in SRO housing is 75 percent of the zero bedroom utility allowance.

The HAP for an assisted occupant in an SRO facility is the lower of the SRO payment standard amount minus the TTP or the gross rent for the unit minus the TTP.

15-I.C. HOUSING QUALITY STANDARDS (HQS)

HQS requirements described in Chapter 8 apply to SRO housing except as modified below.

- *Access:* Access doors to the SRO unit must have working locks for privacy. The occupant must be able to access the unit without going through any other unit. Each unit must have immediate access to two or more approved means of exit from the building, appropriately marked and leading to safe and open space at ground level. The SRO unit must also have any other means of exit required by State or local law.
- *Fire Safety:* All SRO facilities must have a sprinkler system that protects major spaces. "Major spaces" are defined as hallways, common areas, and any other areas specified in local fire, building, or safety codes. SROs must also have hard-wired smoke detectors, and any other fire and safety equipment required by state or local law.

Sanitary facilities and space and security standards must meet local code requirements for SRO housing. In the absence of local code standards the requirements discussed below apply [24 CFR 982.605].

- *Sanitary Facilities:* At least one flush toilet that can be used in privacy, a lavatory basin, and a bathtub or shower in proper operating condition must be provided for each six persons (or fewer) residing in the SRO facility. If the SRO units are leased only to men, flush urinals may be substituted for up to one half of the required number of toilets. Sanitary facilities must be reasonably accessible from a common hall or passageway, and may not be located more than one floor above or below the SRO unit. They may not be located below grade unless the SRO units are located on that level.
- *Space and Security:* An SRO unit must contain at least 110 square feet of floor space, and at least four square feet of closet space with an unobstructed height of at least five feet, for use by the occupant. If the closet space is less than four square feet, the habitable floor space in the SRO unit must be increased by the amount of the deficiency. Exterior doors and windows accessible from outside the SRO unit must be lockable.

Because no children live in SRO housing, the housing quality standards applicable to lead-based paint do not apply.

PART II: CONGREGATE HOUSING

[24 CFR 982.606 through 982.609]

15-II.A. OVERVIEW

Congregate housing is intended for use by elderly persons or persons with disabilities. A congregate housing facility contains a shared central kitchen and dining area and a private living area for the individual household that includes at least a living room, bedroom and bathroom. Food service for residents must be provided.

If approved by the PHA, a family member or live-in aide may reside with the elderly person or person with disabilities. The PHA must approve a live-in aide if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.

When providing HCV assistance in congregate housing, a separate lease and HAP contract are executed for each assisted family, and the standard form of the HAP contract is used.

15-II.B. PAYMENT STANDARD, UTILITY ALLOWANCE, AND HAP CALCULATION

The payment standard for an individual unit in a congregate housing facility is based on the number of rooms in the private living area. If there is only one room in the unit (not including the bathroom or the kitchen, if a kitchen is provided), the PHA must use the payment standard for a 0-bedroom unit. If the unit has two or more rooms (other than the bathroom and the kitchen), the PHA must use the 1-bedroom payment standard.

The HAP for an assisted occupant in a congregate housing facility is the lower of the applicable payment standard minus the TTP or the gross rent for the unit minus the TTP.

The gross rent for the unit for the purpose of calculating HCV assistance is the shelter portion (including utilities) of the resident's monthly housing expense only. The residents' costs for food service should not be included in the rent for a congregate housing unit.

15-II.C. HOUSING QUALITY STANDARDS

HQS requirements as described in Chapter 8 apply to congregate housing except for the requirements stated below.

Congregate housing must have (1) a refrigerator of appropriate size in the private living area of each resident; (2) a central kitchen and dining facilities located within the premises and accessible to the residents, and (3) food service for the residents, that is not provided by the residents themselves.

The housing quality standards applicable to lead-based paint do not apply.

PART III: GROUP HOME

[24 CFR 982.610 through 982.614 and HCV GB p. 7-4]

15-III.A. OVERVIEW

A group home is a state-licensed facility intended for occupancy by elderly persons and/or persons with disabilities. Except for live-in aides, all persons living in a group home, whether assisted or not, must be elderly persons or persons with disabilities. Persons living in a group home must not require continuous medical or nursing care.

A group home consists of bedrooms for residents, which can be shared by no more than two people, and a living room, kitchen, dining area, bathroom, and other appropriate social, recreational, or community space that may be shared with other residents.

No more than 12 persons may reside in a group home including assisted and unassisted residents and any live-in aides.

If approved by the PHA, a live-in aide may live in the group home with a person with disabilities. The PHA must approve a live-in aide if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.

When providing HCV assistance in a group home, a separate lease and HAP contract is executed for each assisted family, and the standard form of the HAP contract is used.

15-III.B. PAYMENT STANDARD, UTILITY ALLOWANCE, AND HAP CALCULATION

Unless there is a live-in aide, the family unit size for an assisted occupant of a group home must be 0- or 1-bedroom, depending on the PHA's subsidy standard. If there is a live-in aide, the aide must be counted in determining the household's unit size.

The payment standard used to calculate the HAP is the lower of the payment standard for the family unit size or the prorata share of the payment standard for the group home size. The prorata share is calculated by dividing the number of persons in the assisted household by the number of persons (assisted and unassisted) living in the group home.

The HAP for an assisted occupant in a group home is the lower of the payment standard minus the TTP or the gross rent minus the TTP.

The utility allowance for an assisted occupant in a group home is the prorata share of the utility allowance for the group home.

The rents paid for participants residing in group homes are subject to generally applicable standards for rent reasonableness. The rent for an assisted person must not exceed the prorata portion of the reasonable rent for the group home. In determining reasonable rent, the PHA should consider whether sanitary facilities and facilities for food preparation and service are common facilities or private facilities.

15-III.C. HOUSING QUALITY STANDARDS

HQS requirements described in Chapter 8 apply to group homes except for the requirements stated below.

- *Sanitary Facilities:* A group home must have at least one bathroom in the facility, with a flush toilet that can be used in privacy, a fixed basin with hot and cold running water, and a shower or bathtub with hot and cold running water. A group home may contain private or common bathrooms. However, no more than four residents can be required to share a bathroom.
- *Food Preparation and Service:* Group home units must contain a kitchen and dining area with adequate space to store, prepare, and serve food. The facilities for food preparation and service may be private or may be shared by the residents. The kitchen must contain a range, an oven, a refrigerator, and a sink with hot and cold running water. The sink must drain into an approvable public or private disposal system.
- *Space and Security:* Group homes must contain at least one bedroom of appropriate size for every two people, and a living room, kitchen, dining area, bathroom, and other appropriate social, recreational, or community space that may be shared with other residents.
- *Structure and Material:* To avoid any threat to the health and safety of the residents, group homes must be structurally sound. Elevators must be in good condition. Group homes must be accessible to and usable by residents with disabilities.
- *Site and Neighborhood:* Group homes must be located in a residential setting. The site and neighborhood should be reasonably free from hazards to the health, safety, and general welfare of the residents, and should not be subject to serious adverse conditions, such as:
 - Dangerous walks or steps
 - Instability
 - Flooding, poor drainage
 - Septic tank back-ups
 - Sewage hazards
 - Mud slides
 - Abnormal air pollution
 - Smoke or dust
 - Excessive noise
 - Vibrations or vehicular traffic
 - Excessive accumulations of trash
 - Vermin or rodent infestation, and
 - Fire hazards.

The housing quality standards applicable to lead-based paint do not apply.

PART IV: SHARED HOUSING

[24 CFR 982.615 through 982.618]

15-IV.A. OVERVIEW

Shared housing is a single housing unit occupied by an assisted family and another resident or residents. The shared unit consists of both common space for use by the occupants of the unit and separate private space for each assisted family.

An assisted family may share a unit with other persons assisted under the HCV program or with other unassisted persons. The owner of a shared housing unit may reside in the unit, but housing assistance may not be paid on behalf of the owner. The resident owner may not be related by blood or marriage to the assisted family.

If approved by the PHA, a live-in aide may reside with the family to care for a person with disabilities. The PHA must approve a live-in aide if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.

When providing HCV assistance in shared housing, a separate lease and HAP contract are executed for each assisted family, and the standard form of the HAP contract is used.

15-IV.B. PAYMENT STANDARD, UTILITY ALLOWANCE AND HAP CALCULATION

The payment standard for a family in shared housing is the lower of the payment standard for the family unit size or the prorata share of the payment standard for the shared housing unit size.

The prorata share is calculated by dividing the number of bedrooms available for occupancy by the assisted family in the private space by the total number of bedrooms in the unit.

The HAP for a family in shared housing is the lower of the payment standard minus the TTP or the gross rent minus the TTP. The utility allowance for an assisted family living in shared housing is the prorata share of the utility allowance for the shared housing unit.

The rents paid for families living in shared housing are subject to generally applicable standards for rent reasonableness. The rent paid to the owner for the assisted family must not exceed the pro-rata portion of the reasonable rent for the shared unit. In determining reasonable rent, the PHA should consider whether sanitary and food preparation areas are private or shared.

15-IV.C. HOUSING QUALITY STANDARDS

The PHA may not give approval to reside in shared housing unless the entire unit, including the portion of the unit available for use by the assisted family under its lease, meets the housing quality standards.

HQS requirements described in Chapter 8 apply to shared housing except for the requirements stated below.

- *Facilities Available for the Family:* Facilities available to the assisted family, whether shared or private, must include a living room, a bathroom, and food preparation and refuse disposal facilities.

- *Space and Security*: The entire unit must provide adequate space and security for all assisted and unassisted residents. The private space for each assisted family must contain at least one bedroom for each two persons in the family. The number of bedrooms in the private space of an assisted family must not be less than the family unit size. A 0-bedroom or 1-bedroom unit may not be used for shared housing.

PART V: COOPERATIVE HOUSING

[24 CFR 982.619]

15-V.A. OVERVIEW

This part applies to rental assistance for a cooperative member residing in cooperative housing. It does not apply to assistance for a cooperative member who has purchased membership under the HCV homeownership option, or to rental assistance for a family that leases a cooperative housing unit from a cooperative member.

A cooperative is a form of ownership (nonprofit corporation or association) in which the residents purchase memberships in the ownership entity. Rather than being charged “rent” a cooperative member is charged a “carrying charge.”

When providing HCV assistance in cooperative housing, the standard form of the HAP contract is used.

15-V.B. PAYMENT STANDARD, UTILITY ALLOWANCE AND HAP CALCULATION

The payment standard and utility allowance are determined according to regular HCV program requirements.

The HAP for a cooperative housing unit is the lower of the payment standard minus the TTP or the monthly carrying charge for the unit, plus any utility allowance, minus the TTP. The monthly carrying charge includes the member’s share of the cooperative debt service, operating expenses, and necessary payments to cooperative reserve funds. The carrying charge does not include down payments or other payments to purchase the cooperative unit or to amortize a loan made to the family for this purpose.

15-V.C. HOUSING QUALITY STANDARDS

All standard HQS requirements apply to cooperative housing units. There are no additional HQS requirements.

PART VI: MANUFACTURED HOMES

[24 CFR 982.620 through 982.624]

15-VI.A. OVERVIEW

A manufactured home is a manufactured structure, transportable in one or more parts that is built on a permanent chassis, and designed for use as a principal place of residence. HCV-assisted families may occupy manufactured homes in two different ways.

(1) A family can choose to rent a manufactured home already installed on a space and the PHA must permit it. In this instance program rules are the same as when a family rents any other residential housing, except that there are special HQS requirements as provided in 15-VI.D below.

(2) HUD also permits an otherwise eligible family that owns a manufactured home to rent a space for the manufactured home and receive HCV assistance with the rent for the space. PHAs may, but are not required to, provide assistance for such families.

15-VI.B. SPECIAL POLICIES FOR MANUFACTURED HOME OWNERS WHO LEASE A SPACE

Family Income

In determining the annual income of families leasing manufactured home spaces, the value of the family's equity in the manufactured home in which the family resides is not counted as a family asset.

Lease and HAP Contract

There is a separate Tenancy Addendum (Form 52642-a) and separate HAP Contract (Form 52642) for this special housing type.

15-VI.C. PAYMENT STANDARD, UTILITY ALLOWANCE AND HAP CALCULATION

Payment Standards

The FMR for a manufactured home space is generally 40 percent of the published FMR for a 2-bedroom unit or, where approved by HUD, the 40th percentile of the rental distribution of manufactured home spaces for the FMR area. The PHA may establish a payment standard for manufactured home spaces that is between 90-110 percent of the FMR for manufactured home spaces.

Utility Allowance

The PHA must establish utility allowances for manufactured home space rental. For the first 12 months of the initial lease term only, the allowance must include an amount for a utility hook-up charge if the family actually incurred a hook-up charge because of a move. This allowance will not be given to a family that leases in place. Utility allowances for manufactured home space must not include the costs of digging a well or installing a septic system.

Space Rent

The space rent is the sum of the rent to the owner for the manufactured home space, any charges for maintenance and management provided by the owner, and the utility allowance for tenant-paid utilities.

Housing Assistance Payment

The HAP for a manufactured home space under the housing choice voucher program is the lower of the payment standard minus the TTP or the (gross) manufactured home space rent minus the TTP.

Rent Reasonableness

Initially, and annually thereafter the PHA must determine that the rent for the manufactured home space is reasonable based on rents for comparable manufactured home spaces. The PHA must consider the location and size of the space, and any services and maintenance to be provided by the owner. By accepting the monthly HAP check, the owner certifies that the rent does not exceed rents charged by the owner for comparable unassisted spaces in the manufactured home park or elsewhere.

15-VLD. HOUSING QUALITY STANDARDS

Under either type of occupancy described in 15-VI.A above, the manufactured home must meet all HQS performance requirements and acceptability criteria discussed in Chapter 8 of this plan. In addition, the following requirement applies:

Manufactured Home Tie-Down

A manufactured home must be placed on the site in a stable manner, and must be free from hazards such as sliding or wind damage. The home must be securely anchored by a tie-down device that distributes and transfers the loads imposed by the unit to appropriate ground anchors to resist overturning and sliding.

PART VII: HOMEOWNERSHIP

[24 CFR 982.625 through 982.643]

15-VII.A. OVERVIEW [24 CFR 982.625]

The homeownership option is used to assist a family residing in a home purchased and owned by one or more members of the family. A family assisted under this option may be newly admitted or an existing participant in the HCV program. The PHA must have the capacity to operate a successful HCV homeownership program as defined by the regulations.

There are two forms of homeownership assistance a PHA may offer under this option: monthly homeownership assistance payments, or a single down payment assistance grant. PHAs may choose to offer either or both forms of homeownership assistance, or choose not to offer either. If a PHA offers both forms of assistance, a family must choose which form of assistance to receive.

The PHA must offer either form of homeownership assistance if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities. It is the sole responsibility of the PHA to determine whether it is reasonable to implement a homeownership program as a reasonable accommodation. The PHA must determine what is reasonable based on the specific circumstances and individual needs of the person with a disability. The PHA may determine that it is not reasonable to offer homeownership assistance as a reasonable accommodation in cases where the PHA has otherwise opted not to implement a homeownership program.

The PHA must approve a live-in aide if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.

15-VII.B. FAMILY ELIGIBILITY [24 CFR 982.627]

The family must meet all of the requirements listed below before the commencement of homeownership assistance. The PHA may also establish additional initial requirements as long as they are described in the PHA administrative plan.

- The family must have been admitted to the Housing Choice Voucher program.
- The family must qualify as a first-time homeowner, or may be a cooperative member.
- The family must meet the Federal minimum income requirement. The family must have a gross annual income equal to the Federal minimum wage multiplied by 2000, based on the income of adult family members who will own the home. The PHA may establish a higher income standard for families. However, a family that meets the federal minimum income requirement (but not the PHA's requirement) will be considered to meet the minimum income requirement if it can demonstrate that it has been pre-qualified or pre-approved for financing that is sufficient to purchase an eligible unit.
- For disabled families, the minimum income requirement is equal to the current SSI monthly payment for an individual living alone, multiplied by 12.
- For elderly or disabled families, welfare assistance payments for adult family members who

will own the home will be included in determining whether the family meets the minimum income requirement. It will not be included for other families.

- The family must satisfy the employment requirements by demonstrating that one or more adult members of the family who will own the home at commencement of homeownership assistance is currently employed on a full-time basis (the term 'full-time employment' means not less than an average of 30 hours per week); and has been continuously so employed during the year before commencement of homeownership assistance for the family.
- The employment requirement does not apply to elderly and disabled families. In addition, if a family, other than an elderly or disabled family includes a person with disabilities, the PHA must grant an exemption from the employment requirement if the PHA determines that it is needed as a reasonable accommodation.
- The family has not defaulted on a mortgage securing debt to purchase a home under the homeownership option
- Except for cooperative members who have acquired cooperative membership shares prior to commencement of homeownership assistance, no family member has a present ownership interest in a residence at the commencement of homeownership assistance for the purchase of any home.
- Except for cooperative members who have acquired cooperative membership shares prior to the commencement of homeownership assistance, the family has entered a contract of sale in accordance with 24 CFR 982.631(c).

15-VII.C. SELECTION OF FAMILIES [24 CFR 982.626]

Unless otherwise provided (under the homeownership option), the PHA may limit homeownership assistance to families or purposes defined by the PHA, and may prescribe additional requirements for commencement of homeownership assistance for a family. Any such limits or additional requirements must be described in the PHA administrative plan.

If the PHA limits the number of families that may participate in the homeownership option, the PHA must establish a system by which to select families to participate.

15-VII.D. ELIGIBLE UNITS [24 CFR 982.628]

In order for a unit to be eligible, the PHA must determine that the unit satisfies all of the following requirements:

- The unit must meet HUD's "eligible housing" requirements. The unit may not be any of the following:
 - A public housing or Indian housing unit;
 - A unit receiving Section 8 project-based assistance;
 - A nursing home, board and care home, or facility providing continual psychiatric, medical or nursing services;
 - A college or other school dormitory;

- On the grounds of penal, reformatory, medical, mental, or similar public or private institutions.
- The unit must be under construction or already exist at the time the family enters into the contract of sale.
- The unit must be a one-unit property or a single dwelling unit in a cooperative or condominium.
- The unit must have been inspected by the PHA and by an independent inspector designated by the family.
- The unit must meet Housing Quality Standards (see Chapter 8).
- For a unit where the family will not own fee title to the real property (such as a manufactured home), the home must have a permanent foundation and the family must have the right to occupy the site for at least 40 years.
- For PHA-owned units all of the following conditions must be satisfied:
 - The PHA informs the family, both orally and in writing, that the family has the right to purchase any eligible unit and a PHA-owned unit is freely selected by the family without PHA pressure or steering;
 - The unit is not ineligible housing;
 - The PHA obtains the services of an independent agency to inspect the unit for compliance with HQS, review the independent inspection report, review the contract of sale, determine the reasonableness of the sales price and any PHA provided financing. All of these actions must be completed in accordance with program requirements.

The PHA must not approve the unit if the PHA has been informed that the seller is debarred, suspended, or subject to a limited denial of participation.

15-VII.E. ADDITIONAL PHA REQUIREMENTS FOR SEARCH AND PURCHASE [24 CFR 982.629]

It is the family's responsibility to find a home that meets the criteria for voucher homeownership assistance. The PHA may establish the maximum time that will be allowed for a family to locate and purchase a home, and may require the family to report on their progress in finding and purchasing a home. If the family is unable to purchase a home within the maximum time established by the PHA, the PHA may issue the family a voucher to lease a unit or place the family's name on the waiting list for a voucher.

15-VII.F. HOMEOWNERSHIP COUNSELING [24 CFR 982.630]

Before commencement of homeownership assistance for a family, the family must attend and satisfactorily complete the pre-assistance homeownership and housing counseling program required by the PHA. HUD suggests the following topics for the PHA-required pre-assistance counseling:

- Home maintenance (including care of the grounds);

- Budgeting and money management;
- Credit counseling;
- How to negotiate the purchase price of a home;
- How to obtain homeownership financing and loan pre-approvals, including a description of types of financing that may be available, and the pros and cons of different types of financing;
- How to find a home, including information about homeownership opportunities, schools, and transportation in the PHA jurisdiction;
- Advantages of purchasing a home in an area that does not have a high concentration of low-income families and how to locate homes in such areas;
- Information on fair housing, including fair housing lending and local fair housing enforcement agencies; and
- Information about the Real Estate Settlement Procedures Act (12 U.S.C. 2601 et seq.) (RESPA), state and Federal truth-in-lending laws, and how to identify and avoid loans with oppressive terms and conditions.

The PHA may adapt the subjects covered in pre-assistance counseling (as listed) to local circumstances and the needs of individual families.

The PHA may also offer additional counseling after commencement of homeownership assistance (ongoing counseling). If the PHA offers a program of ongoing counseling for participants in the homeownership option, the PHA shall have discretion to determine whether the family is required to participate in the ongoing counseling.

If the PHA does not use a HUD-approved housing counseling agency to provide the counseling, the PHA should ensure that its counseling program is consistent with the counseling provided under HUD's Housing Counseling program.

15-VII.G. HOME INSPECTIONS, CONTRACT OF SALE, AND PHA DISAPPROVAL OF SELLER [24 CFR 982.631]

Home Inspections

The PHA may not commence monthly homeownership assistance payments or provide down payment assistance grants for a family until the PHA has inspected the unit and has determined that the unit passes HQS.

An independent professional inspector selected by and paid for by the family must also inspect the unit. The independent inspection must cover major building systems and components, including foundation and structure, housing interior and exterior, and the roofing, plumbing, electrical, and heating systems. The independent inspector must be qualified to report on property conditions, including major building systems and components.

The PHA may not require the family to use an independent inspector selected by the PHA. The independent inspector may not be a PHA employee or contractor, or other person under control of the PHA. However, the PHA may establish standards for qualification of inspectors selected

by families under the homeownership option.

The PHA may disapprove a unit for assistance based on information in the independent inspector's report, even if the unit was found to comply with HQS.

Contract of Sale

Before commencement of monthly homeownership assistance payments or receipt of a down payment assistance grant, a member or members of the family must enter into a contract of sale with the seller of the unit to be acquired by the family. The family must give the PHA a copy of the contract of sale. The contract of sale must:

- Specify the price and other terms of sale by the seller to the purchaser;
- Provide that the purchaser will arrange for a pre-purchase inspection of the dwelling unit by an independent inspector selected by the purchaser;
- Provide that the purchaser is not obligated to purchase the unit unless the inspection is satisfactory to the purchaser;
- Provide that the purchaser is not obligated to pay for any necessary repairs; and
- Contain a certification from the seller that the seller has not been debarred, suspended, or subject to a limited denial of participation under CFR part 24.

Disapproval of a Seller

In its administrative discretion, the PHA may deny approval of a seller for the same reasons a PHA may disapprove an owner under the regular HCV program [see 24 CFR 982.306(c)].

15-VII.H. FINANCING [24 CFR 982.632]

The PHA may establish requirements for financing purchase of a home under the homeownership option. This may include requirements concerning qualification of lenders, terms of financing, restrictions concerning debt secured by the home, lender qualifications, loan terms, and affordability of the debt. The PHA must establish policies describing these requirements in the administrative plan.

A PHA may not require that families acquire financing from one or more specified lenders, thereby restricting the family's ability to secure favorable financing terms.

15-VII.I. CONTINUED ASSISTANCE REQUIREMENTS; FAMILY OBLIGATIONS [24 CFR 982.633]

Homeownership assistance may only be paid while the family is residing in the home. If the family moves out of the home, the PHA may not continue homeownership assistance after the month when the family moves out. The family or lender is not required to refund to the PHA the homeownership assistance for the month when the family moves out.

Before commencement of homeownership assistance, the family must execute a statement in which the family agrees to comply with all family obligations under the homeownership option.

The family must comply with the following obligations:

- The family must comply with the terms of the mortgage securing debt incurred to purchase the home, or any refinancing of such debt.
- The family may not convey or transfer ownership of the home, except for purposes of financing, refinancing, or pending settlement of the estate of a deceased family member. Use and occupancy of the home are subject to 24 CFR 982.551 (h) and (i).
- The family must supply information to the PHA or HUD as specified in 24 CFR 982.551(b). The family must further supply any information required by the PHA or HUD concerning mortgage financing or refinancing, sale or transfer of any interest in the home, or homeownership expenses.
- The family must notify the PHA before moving out of the home.
- The family must notify the PHA if the family defaults on the mortgage used to purchase the home.
- No family member may have any ownership interest in any other residential property.
- The family must comply with the obligations of a participant family described in 24 CFR 982.551, except for the following provisions which do not apply to assistance under the homeownership option: 24 CFR 982.551(c), (d), (e), (f), (g) and (j).

15-VII.J. MAXIMUM TERM OF HOMEOWNER ASSISTANCE [24 CFR 982.634]

Except in the case of a family that qualifies as an elderly or disabled family, other family members (described below) shall not receive homeownership assistance for more than:

- Fifteen years, if the initial mortgage incurred to finance purchase of the home has a term of 20 years or longer; or
- Ten years, in all other cases.

The maximum term described above applies to any member of the family who:

- Has an ownership interest in the unit during the time that homeownership payments are made; or
- Is the spouse of any member of the household who has an ownership interest in the unit during the time homeownership payments are made.

In the case of an elderly family, the exception only applies if the family qualifies as an elderly family at the start of homeownership assistance. In the case of a disabled family, the exception applies if at any time during receipt of homeownership assistance the family qualifies as a disabled family.

If, during the course of homeownership assistance, the family ceases to qualify as a disabled or elderly family, the maximum term becomes applicable from the date homeownership assistance commenced. However, such a family must be provided at least 6 months of homeownership assistance after the maximum term becomes applicable (provided the family is otherwise eligible to receive homeownership assistance).

If the family has received such assistance for different homes, or from different PHAs, the total of such assistance terms is subject to the maximum term described in this part.

15-VII.K. HOMEOWNERSHIP ASSISTANCE PAYMENTS AND HOMEOWNERSHIP EXPENSES [24 CFR 982.635]

The monthly homeownership assistance payment is the lower of: the voucher payment standard minus the total tenant payment, or the monthly homeownership expenses minus the total tenant payment.

In determining the amount of the homeownership assistance payment, the PHA will use the same payment standard schedule, payment standard amounts, and subsidy standards as those described in elsewhere in this plan for the Housing Choice Voucher program.

The PHA may pay the homeownership assistance payments directly to the family, or at the PHA's discretion, to a lender on behalf of the family. If the assistance payment exceeds the amount due to the lender, the PHA must pay the excess directly to the family.

Homeownership assistance for a family terminates automatically 180 calendar days after the last homeownership assistance payment on behalf of the family. However, a PHA may grant relief from this requirement in those cases where automatic termination would result in extreme hardship for the family.

The PHA must adopt policies for determining the amount of homeownership expenses to be allowed by the PHA in accordance with HUD requirements.

Homeownership expenses (not including cooperatives) only include amounts allowed by the PHA to cover:

- Principal and interest on initial mortgage debt, any refinancing of such debt, and any mortgage insurance premium incurred to finance purchase of the home;
- Real estate taxes and public assessments on the home;
- Home insurance;
- The PHA allowance for maintenance expenses;
- The PHA allowance for costs of major repairs and replacements;
- The PHA utility allowance for the home;
- Principal and interest on mortgage debt incurred to finance costs for major repairs, replacements or improvements for the home. If a member of the family is a person with disabilities, such debt may include debt incurred by the family to finance costs needed to make the home accessible for such person, if the PHA determines that allowance of such costs as homeownership expenses is needed as a reasonable accommodation so that the homeownership option is readily accessible to and usable by such person;
- Land lease payments where a family does not own fee title to the real property on which the home is located; [see 24 CFR 982.628(b)].
- For a condominium unit, condominium operating charges or maintenance fees assessed by

the condominium homeowner association.

Homeownership expenses for a cooperative member may only include amounts allowed by the PHA to cover:

- The cooperative charge under the cooperative occupancy agreement including payment for real estate taxes and public assessments on the home;
- Principal and interest on initial debt incurred to finance purchase of cooperative membership shares and any refinancing of such debt;
- Home insurance;
- The PHA allowance for maintenance expenses;
- The PHA allowance for costs of major repairs and replacements;
- The PHA utility allowance for the home; and
- Principal and interest on debt incurred to finance major repairs, replacements or improvements for the home. If a member of the family is a person with disabilities, such debt may include debt incurred by the family to finance costs needed to make the home accessible for such person, if the PHA determines that allowance of such costs as homeownership expenses is needed as a reasonable accommodation so that the homeownership option is readily accessible to and usable by such person.
- Cooperative operating charges or maintenance fees assessed by the cooperative homeowner association.

15-VII.L. PORTABILITY [24 CFR 982.636, 982.637, 982.353(b) and (c), 982.552, 982.553]

Subject to the restrictions on portability included in HUD regulations and PHA policies, a family may exercise portability if the receiving PHA is administering a voucher homeownership program and accepting new homeownership families. The receiving PHA may absorb the family into its voucher program, or bill the initial PHA.

The family must attend the briefing and counseling sessions required by the receiving PHA. The receiving PHA will determine whether the financing for, and the physical condition of the unit, are acceptable. The receiving PHA must promptly notify the initial PHA if the family has purchased an eligible unit under the program, or if the family is unable to purchase a home within the maximum time established by the PHA.

15-VII.M. MOVING WITH CONTINUED ASSISTANCE [24 CFR 982.637]

A family receiving homeownership assistance may move with continued tenant-based assistance. The family may move with voucher rental assistance or with voucher homeownership assistance. Continued tenant-based assistance for a new unit cannot begin so long as any family member holds title to the prior home.

The PHA may deny permission to move to a new unit with continued voucher assistance as follows:

- Lack of funding to provide continued assistance.

- At any time, the PHA may deny permission to move with continued rental or homeownership assistance in accordance with 24 CFR 982.638, regarding denial or termination of assistance.
- In accordance with the PHA's policy regarding number of moves within a 12-month period.

The PHA must deny the family permission to move to a new unit with continued voucher rental assistance if:

- The family defaulted on an FHA-insured mortgage; and
- The family fails to demonstrate that the family has conveyed, or will convey, title to the home, as required by HUD, to HUD or HUD's designee; and the family has moved, or will move, from the home within the period established or approved by HUD.

15-VII.N. DENIAL OR TERMINATION OF ASSISTANCE [24 CFR 982.638]

At any time, the PHA may deny or terminate homeownership assistance in accordance with HCV program requirements in 24 CFR 982.552 (Grounds for denial or termination of assistance) or 24 CFR 982.553 (Crime by family members).

The PHA may also deny or terminate assistance for violation of participant obligations described in 24 CFR Parts 982.551 or 982.633 and in accordance with its own policy.

The PHA must terminate voucher homeownership assistance for any member of family receiving homeownership assistance that is dispossessed from the home pursuant to a judgment or order of foreclosure on any mortgage (whether FHA insured or non-FHA) securing debt incurred to purchase the home, or any refinancing of such debt.

Chapter 16

PROGRAM ADMINISTRATION

INTRODUCTION

This chapter discusses administrative policies and practices that are relevant to the activities covered in this plan. The policies are discussed in seven parts as described below:

Part I: Administrative Fee Reserve. This part describes the PHA's policies with regard to oversight of expenditures from its administrative fee reserve.

Part II: Setting Program Standards and Schedules. This part describes what payment standards are, and how they are updated, as well as how utility allowances are established and revised.

Part III: Informal Reviews and Hearings. This part outlines the requirements and procedures for informal reviews and hearings, and for informal hearings regarding citizenship status.

Part IV: Owner or Family Debts to the PHA. This part describes policies for recovery of monies that the PHA has overpaid on behalf of families, or to owners, and describes the circumstances under which the PHA will offer repayment agreements to owners and families. Also discussed are the consequences for failure to make payments in accordance with a repayment agreement.

Part V: Section 8 Management Assessment Program (SEMAP). This part describes what the SEMAP scores represent, how they are established, and how those scores affect a PHA.

Part VI: Record-Keeping. All aspects of the program involve certain types of record-keeping. This part outlines the privacy rights of applicants and participants and record retention policies the PHA will follow.

Part VII: Reporting and Record Keeping for Children with Environmental Intervention Blood Lead Level. This part describes the PHA's responsibilities for reporting, data collection, and record keeping relative to children with environmental intervention blood lead levels that are less than six years of age, and are receiving HCV assistance.

Part VIII: Determination of Insufficient Funding. This part describes the PHA's policies for determining if there is sufficient funding to issue vouchers, to approve moves to higher cost units or areas, and to continue assistance for all participant families.

PART I: ADMINISTRATIVE FEE RESERVE [24 CFR 982.155]

The PHA must maintain an administrative fee reserve for the program to pay program administrative expenses in excess of administrative fees paid by HUD for a PHA fiscal year. If funds in the administrative fee reserve are not needed to cover PHA administrative expenses, the PHA may use these funds for other housing purposes permitted by Federal, State and local law.

If the PHA has not adequately administered any Section 8 program, HUD may prohibit use of funds in the administrative fee reserve, and may direct the PHA to use funds in the reserve to improve administration of the program or to reimburse ineligible expenses. HUD also may prohibit use of the funds for certain purposes.

HUD requires the PHA Board of Commissioners or other authorized officials to establish the maximum amount that may be charged against the administrative fee reserve without specific approval.

PHA Policy

Expenditures from the administrative fee reserve will be made in accordance with all applicable Federal requirements. Expenditures will not exceed \$10,000 per occurrence without the prior approval of the PHA's Board of Commissioners.

PART II: SETTING PROGRAM STANDARDS AND SCHEDULES

16-II.A. OVERVIEW

Although many of the program's requirements are established centrally by HUD, the HCV program's regulations recognize that some flexibility is required to allow the PHA to adapt the program to local conditions. This part discusses how the PHA establishes and updates certain schedules and standards that are used to administer the program locally. Details about how these schedules are applied to individual families are provided in other chapters. The schedules and standards discussed here include:

- *Payment Standards*, which dictate the maximum subsidy a family can receive (application of the payment standards is discussed in Chapter 6); and
- *Utility Allowances*, which specify how a family's payment should be adjusted to account for tenant-paid utilities (application of utility allowances is discussed in Chapter 6).

PHA Policy

Copies of the payment standard and utility allowance schedules are available for review in the PHA's offices during normal business hours.

Families, owners, and members of the public may submit written comments on the schedules discussed in this part, at any time, for consideration during the next revision cycle.

The PHA will maintain documentation to support its annual review of payment standards and utility allowance schedules. This documentation will be retained for at least 3 years.

16-II.B. PAYMENT STANDARDS [24 CFR 982.503; HCV GB, Chapter 7]

The payment standard sets the maximum subsidy payment a family can receive from the PHA each month [24 CFR 982.505(a)]. Payment standards are based on fair market rents (FMRs) published annually by HUD. FMRs are set at a percentile within the rent distribution of standard quality rental housing units in each FMR area. For most jurisdictions FMRs are set at the 40th percentile of rents in the market area.

The PHA must establish a payment standard schedule that establishes payment standard amounts for each FMR area within the PHA's jurisdiction, and for each unit size within each of the FMR areas. For each unit size, the PHA may establish a single payment standard amount for the whole FMR area, or may set different payment standards for different parts of the FMR area. Unless HUD grants an exception, the PHA is required to establish a payment standard within a "basic range" established by HUD – between 90 and 110 percent of the published FMR for each unit size.

Updating Payment Standards

When HUD updates its FMRs, the PHA must update its payment standards if the standards are no longer within the basic range [24 CFR 982.503(b)]. HUD may require the PHA to make further adjustments if it determines that rent burdens for assisted families in the PHA's jurisdiction are unacceptably high [24 CFR 982.503(g)].

PHA Policy

The PHA will review the appropriateness of the payment standards on an annual basis when the new FMR is published. In addition to ensuring the payment standards are always within the "basic range" the PHA will consider the following factors when determining whether an adjustment should be made to the payment standard schedule:

Funding Availability: The PHA will review the budget to determine the impact projected subsidy adjustments will have on funding available for the program and the number of families served. The PHA will compare the number of families who could be served under revised payment standard amounts with the number assisted under current payment standard amounts.

Rent Burden of Participating Families: Rent burden will be determined by identifying the percentage of families, for each unit size, that are paying more than 30 percent of their monthly adjusted income as the family share. When 40 percent or more of families, for any given unit size, are paying more than 30 percent of adjusted monthly income as the family share, the PHA will consider increasing the payment standard. In evaluating rent burdens, the PHA will not include families renting a larger unit than their family unit size.

Quality of Units Selected: The PHA will review the quality of units selected by participant families when making the determination of the percent of income families are paying for housing, to ensure that payment standard increases are only made when needed to reach the mid-range of the market.

Changes in Rent to Owner: The PHA may review a sample of the units to determine how often owners are increasing or decreasing rents and the average percent of increases/decreases by bedroom size.

Unit Availability: The PHA will review the availability of units for each unit size, particularly in areas with low concentrations of poor and minority families.

Lease-up Time and Success Rate: The PHA will consider the percentage of families that are unable to locate suitable housing before the voucher expires and whether families are leaving the jurisdiction to find affordable housing.

Changes to payment standard amounts will be effective on December 1st of every year unless, based on the proposed FMRs, it appears that one or more of the PHA's current payment standard amounts will be outside the basic range when the final FMRs are published. In that case, the PHAs payment standards will be effective October 1st instead of December 1st.

If the PHA has already processed reexaminations that will be effective on or after October 1st, and the effective date of the payment standards is October 1st, the PHA will make retroactive adjustments to any such reexaminations if the new payment standard amount is higher than the one used by the PHA at the time the reexamination was originally processed.

Exception Payment Standards [982.503(c)]

The PHA must request HUD approval to establish payment standards that are higher than the basic range. At HUD's sole discretion, HUD may approve a payment standard amount that is higher than the basic range for a designated part of the FMR area. HUD may approve an exception payment standard amount (in accordance with program requirements) for all units, or for all units of a given size, leased by program families in the exception area. Any PHA with jurisdiction in the exception area may use the HUD-approved exception payment standard amount. The total population of all HUD-approved exception areas in an FMR area may not include more than 50 percent of the population of the FMR area.

Unit-by-Unit Exceptions [24 CFR 982.503(c)(2)(ii)]

Unit-by-unit exceptions to the PHA's payment standards generally are not permitted. However, an exception may be made as a reasonable accommodation for a family that includes a person with disabilities. (See Chapter 2 for a discussion of reasonable accommodations.) This type of exception does not affect the PHA's payment standard schedule.

When needed as a reasonable accommodation, the PHA may make an exception to the payment standard without HUD approval if the exception amount does not exceed 110 percent of the applicable FMR for the unit size [HCV GB 7-9]. The PHA may request HUD approval for an exception to the payment standard for a particular family if the required amount falls between 110 and 120 percent of the FMR.

PHA Policy

A family that requires a reasonable accommodation may request a higher payment standard at the time the Request for Tenancy Approval (RFTA) is submitted. The family must document the need for the exception. In order to approve an exception, or request an exception from HUD, the PHA must determine that:

There is a shortage of affordable units that would be appropriate for the family;

The family's TTP would otherwise exceed 40 percent of adjusted monthly income; and

The rent for the unit is reasonable.

"Success Rate" Payment Standard Amounts [24 CFR 982.503(e)]

If a substantial percentage of families have difficulty finding a suitable unit, the PHA may request a "success rate payment standard" that applies to the entire jurisdiction. If approved by HUD, a success rate payment standard allows the PHA to set its payment standards at 90-110 percent of a higher FMR (the 50th, rather than the 40th percentile FMR). To support the request, the PHA must demonstrate that during the most recent 6-month period for which information is available:

- Fewer than 75 percent of families who were issued vouchers became participants;
- The PHA had established payment standards for all unit sizes, and for the entire jurisdiction, at 110 percent of the published FMR; and
- The PHA had a policy of allowing voucher holders who made sustained efforts to locate units at least 90 days to search for a unit.

Although HUD approves the success rate payment standard for all unit sizes in the FMR area, the PHA may choose to adjust the payment standard for only some unit sizes in all, or a designated part, of the PHA's jurisdiction within the FMR area.

Decreases in the Payment Standard Below the Basic Range [24 CFR 982.503(d)]

The PHA must request HUD approval to establish a payment standard amount that is lower than the basic range. At HUD's sole discretion, HUD may approve establishment of a payment standard lower than the basic range. HUD will not approve a lower payment standard if the family share for more than 40 percent of program participants exceeds 30 percent of adjusted monthly income.

16-II.C. UTILITY ALLOWANCES [24 CFR 982.517]

A PHA-established utility allowance schedule is used in determining family share and PHA subsidy. The PHA must maintain a utility allowance schedule for (1) all tenant-paid utilities, (2) the cost of tenant-supplied refrigerators and ranges, and (3) other tenant-paid housing services such as trash collection.

The utility allowance schedule must be determined based on the typical cost of utilities and services paid by energy-conservative households that occupy housing of similar size and type in the same locality. In developing the schedule, the PHA must use normal patterns of consumption for the community as a whole, and current utility rates.

The utility allowance must include the utilities and services that are necessary in the locality to provide housing that complies with housing quality standards. Costs for telephone, cable/satellite television, and internet services are not included in the utility allowance schedule.

In the utility allowance schedule, the PHA must classify utilities and other housing services according to the following general categories: space heating; air conditioning; cooking; water heating; water; sewer; trash collection; other electric; cost of tenant-supplied refrigerator; cost of tenant-supplied range; and other specified housing services.

The cost of each utility and housing service must be stated separately by unit size and type. Chapter 18 of the *HCV Guidebook* provides detailed guidance to the PHA about establishing utility allowance schedules.

Air Conditioning

An allowance for air-conditioning must be provided when the majority of housing units in the market have central air-conditioning or are wired for tenant-installed air conditioners.

PHA Policy

The PHA has included an allowance for air-conditioning in its schedule. Central air-conditioning or a portable air conditioner must be present in a unit before the PHA will apply this allowance to a family's rent and subsidy calculations.

Reasonable Accommodation

HCV program regulations require a PHA to approve a utility allowance amount higher than shown on the PHA's schedule if a higher allowance is needed as a reasonable accommodation for a family member with a disability. For example, if a family member with a disability requires such an accommodation, the PHA will approve an allowance for air-conditioning, even if the PHA has determined that an allowance for air-conditioning generally is not needed (See Chapter 2 for policies regarding the request and approval of reasonable accommodations).

Utility Allowance Revisions

The PHA must review its schedule of utility allowances each year, and must revise the schedule if there has been a change of 10 percent or more in any utility rate since the last time the allowance for that utility was revised.

The PHA must maintain information supporting its annual review of utility allowance and any revisions made in its utility allowance schedule.

PART III: INFORMAL REVIEWS AND HEARINGS

16-III.A. OVERVIEW

When the PHA makes a decision that has a negative impact on a family, the family is often entitled to appeal the decision. For applicants, the appeal takes the form of an informal review; for participants, or for applicants denied admission because of citizenship issues, the appeal takes the form of an informal hearing.

PHAs are required to include in their administrative plans, informal review procedures for applicants, and informal hearing procedures for participants [24 CFR 982.54(d)(12) and (13)].

16-III.B. INFORMAL REVIEWS

Informal reviews are provided for program applicants. An applicant is someone who has applied for admission to the program, but is not yet a participant in the program. Informal reviews are intended to provide a “minimum hearing requirement” [24 CFR 982.554], and need not be as elaborate as the informal hearing requirements. (Federal Register Volume 60, No. 127, p 36490).

Decisions Subject to Informal Review

The PHA must give an applicant the opportunity for an informal review of a decision denying assistance [24 CFR 982.554(a)]. Denial of assistance may include any or all of the following [24 CFR 982.552(a)(2)]:

- Denying listing on the PHA waiting list
- Denying or withdrawing a voucher
- Refusing to enter into a HAP contract or approve a lease
- Refusing to process or provide assistance under portability procedures
- Denial of assistance based on an unfavorable history that may be the result of domestic violence, dating violence or stalking. (See Section 3-III.G.)

Informal reviews are *not* required for the following reasons [24 CFR 982.554(c)]:

- Discretionary administrative determinations by the PHA
- General policy issues or class grievances
- A determination of the family unit size under the PHA subsidy standards
- A PHA determination not to approve an extension or suspension of a voucher term
- A PHA determination not to grant approval of the tenancy
- A PHA determination that the unit is not in compliance with the HQS
- A PHA determination that the unit is not in accordance with the HQS due to family size or composition

PHA Policy

The PHA will only offer an informal review to applicants for whom assistance is being denied. Denial of assistance includes: denying listing on the PHA waiting list; denying or withdrawing a voucher; refusing to enter into a HAP contract or approve a lease; refusing to process or provide assistance under portability procedures.

Notice to the Applicant [24 CFR 982.554(a)]

The PHA must give an applicant prompt notice of a decision denying assistance. The notice must contain a brief statement of the reasons for the PHA decision, and must also state that the applicant may request an informal review of the decision. The notice must describe how to obtain the informal review.

Scheduling an Informal ReviewPHA Policy

A request for an informal review must be made in writing and delivered to the PHA either in person or by first class mail, by the close of the business day, no later than 15 business days from the date of the PHA's denial of assistance.

Except as provided in Section 3-III.G, the PHA must schedule and send written notice of the informal review within 15 business days of the family's request.

Informal Review Procedures [24 CFR 982.554(b)]PHA Policy

The informal review must be conducted by a person other than the one who made or approved the decision under review, or a subordinate of this person.

The applicant must be provided an opportunity to present written or oral objections to the decision of the PHA.

The person conducting the review will make a recommendation to the PHA, but the PHA is responsible for making the final decision as to whether assistance should be granted or denied.

If the applicant fails to appear for their informal hearing, the applicant will have one opportunity to reschedule within 15 business days of the original hearing date. If the applicant misses the re-scheduled hearing, the denial of admission will stand and the family will be so notified.

Informal Review Decision [24 CFR 982.554(b)]

The PHA must notify the applicant of the PHA's final decision, including a brief statement of the reasons for the final decision.

PHA Policy

In rendering a decision, the PHA will evaluate the following matters:

Whether or not the grounds for denial were stated factually in the Notice.

The validity of grounds for denial of assistance. If the grounds for denial are not specified in the regulations, then the decision to deny assistance will be overturned.

The validity of the evidence. The PHA will evaluate whether the facts presented prove the grounds for denial of assistance. If the facts prove that there are grounds for denial, and the denial is required by HUD, the PHA will uphold the decision to deny assistance.

If the facts prove the grounds for denial, and the denial is discretionary, the PHA will consider the recommendation of the person conducting the informal review in making the final decision whether to deny assistance.

The PHA will notify the applicant of the final decision, including a statement explaining the reason(s) for the decision. The notice will be mailed within 15 business days of the informal review, to the applicant and his or her representative, if any, along with proof of mailing.

If the decision to deny is overturned as a result of the informal review, processing for admission will resume.

16-III.C. INFORMAL HEARINGS FOR PARTICIPANTS [24 CFR 982.555, Pub.L. 109-162]

PHAs must offer an informal hearing for certain PHA determinations relating to the individual circumstances of a participant family. A participant is defined as a family that has been admitted to the PHA's HCV program and is currently assisted in the program. The purpose of the informal hearing is to consider whether the PHA's decisions related to the family's circumstances are in accordance with the law, HUD regulations and PHA policies.

The PHA is not permitted to terminate a family's assistance until the time allowed for the family to request an informal hearing has elapsed, and any requested hearing has been completed. Termination of assistance for a participant may include any or all of the following:

- Refusing to enter into a HAP contract or approve a lease
- Terminating housing assistance payment(s) under an outstanding HAP contract
- Refusing to process or provide assistance under portability procedures

Decisions Subject to Informal Hearing

Circumstances for which the PHA must give a participant family an opportunity for an informal hearing are as follows:

- A determination of the family's annual or adjusted income, and the use of such income to compute the housing assistance payment
- A determination of the appropriate utility allowance (if any) for tenant-paid utilities from the PHA utility allowance schedule
- A determination of the family unit size under the PHA's subsidy standards

- A determination that a certificate program family is residing in a unit with a larger number of bedrooms than appropriate for the family unit size under the PHA's subsidy standards, or the PHA determination to deny the family's request for exception from the standards
- A determination to terminate assistance for a participant family because of the family's actions or failure to act
- A determination to terminate assistance because the participant has been absent from the assisted unit for longer than the maximum period permitted under PHA policy and HUD rules
- A determination to terminate a family's Family Self Sufficiency contract, withhold supportive services, or propose forfeiture of the family's escrow account [24 CFR 984.303(i)]
- A determination to deny admission based on an unfavorable history that may be the result of domestic violence, dating violence, or stalking.

Circumstances for which an informal hearing is not required are as follows:

- Discretionary administrative determinations by the PHA
- General policy issues or class grievances
- Establishment of the PHA schedule of utility allowances for families in the program
- A PHA determination not to approve an extension or suspension of a voucher term
- A PHA determination not to approve a unit or tenancy
- A PHA determination that a unit selected by the applicant is not in compliance with the HQS
- A PHA determination that the unit is not in accordance with HQS because of family size
- A determination by the PHA to exercise or not to exercise any right or remedy against an owner under a HAP contract

PHA Policy

The PHA will only offer participants the opportunity for an informal hearing when required.

Informal Hearing Procedures

***Notice to the Family* [24 CFR 982.555(c)]**

When the PHA makes a decision that is subject to informal hearing procedures, the PHA must inform the family of its right to an informal hearing at the same time that it informs the family of the decision.

For decisions related to the family's annual or adjusted income, the determination of the appropriate utility allowance, and the determination of the family unit size, the PHA must notify the family that they may ask for an explanation of the basis of the determination, and that if they do not agree with the decision, they may request an informal hearing on the decision.

For decisions related to the termination of the family's assistance, or the denial of a family's request for an exception to the PHA's subsidy standards, the notice must contain a brief statement of the reasons for the decision, a statement that if the family does not agree with the decision, the family may request an informal hearing on the decision, and a statement of the deadline for the family to request an informal hearing.

PHA Policy

In cases where the PHA makes a decision for which an informal hearing must be offered, the notice to the family will include all of the following:

The proposed action or decision of the PHA.

A brief statement of the reasons for the decision including the regulatory reference.

A statement of the family's right to an explanation of the basis for the PHA's decision.

A statement that if the family does not agree with the decision the family may request an informal hearing of the decision.

A deadline for the family to request the informal hearing.

To whom the hearing request should be addressed.

Scheduling an Informal Hearing [24 CFR 982.555(d)]

When an informal hearing is required, the PHA must proceed with the hearing in a reasonably expeditious manner upon the request of the family.

PHA Policy

A request for an informal hearing must be made in writing and delivered to the PHA either in person or by first class mail, by the close of the business day, no later than 10 business days from the date of the PHA's decision or notice to terminate assistance.

The PHA must schedule and send written notice of the informal hearing to the family within 15 business days of receipt of the family's request.

The family may request to reschedule a hearing for good cause, or if it is needed as a reasonable accommodation for a person with disabilities. *Good cause* is defined as an unavoidable conflict which seriously affects the health, safety or welfare of the family. Requests to reschedule a hearing must be made orally or in writing prior to the hearing date. At its discretion, the PHA may request documentation of the "good cause" prior to rescheduling the hearing.

If the family does not appear at the scheduled time, and was unable to reschedule the hearing in advance due to the nature of the conflict, the family must contact the PHA within 24 hours of the scheduled hearing date, excluding weekends and holidays. The PHA will reschedule the hearing only if the family can show good cause for the failure to appear, or if it is needed as a reasonable accommodation for a person with disabilities. At its discretion, the PHA may request documentation of the "good cause" prior to

rescheduling the hearing.

Pre-Hearing Right to Discovery [24 CFR 982.555(e)]

Participants and the PHA are permitted pre-hearing discovery rights. The family must be given the opportunity to examine before the hearing any PHA documents that are directly relevant to the hearing. The family must be allowed to copy any such documents at their own expense. If the PHA does not make the document available for examination on request of the family, the PHA may not rely on the document at the hearing.

The PHA hearing procedures may provide that the PHA must be given the opportunity to examine at the PHA offices before the hearing, any family documents that are directly relevant to the hearing. The PHA must be allowed to copy any such document at the PHA's expense. If the family does not make the document available for examination on request of the PHA, the family may not rely on the document at the hearing.

For the purpose of informal hearings, *documents* include records and regulations.

PHA Policy

The family will be allowed to copy any documents related to the hearing at a cost of \$.25 per page. The family must request discovery of PHA documents no later than 12:00 p.m. on the business day prior to the scheduled hearing date

The PHA must be given an opportunity to examine at the PHA offices before the hearing any family documents that are directly relevant to the hearing. Whenever a participant requests an informal hearing, the PHA will automatically mail a letter to the participant requesting a copy of all documents that the participant intends to present or utilize at the hearing. The participant must make the documents available no later than 12:00 pm on the business day prior to the scheduled hearing date.

Participant's Right to Bring Counsel [24 CFR 982.555(e)(3)]

At its own expense, the family may be represented by a lawyer or other representative at the informal hearing.

Informal Hearing Officer [24 CFR 982.555(e)(4)]

Informal hearings will be conducted by a person approved by the PHA, other than the person who made or approved the decision or a subordinate of the person who made or approved the decision.

PHA Policy

PHA hearings will be conducted by a single hearing officer and not a panel.

A hearing shall be conducted by an impartial person or persons, appointed by the PHA, other than the person who made or approved the PHA action under review or a subordinate of such person.

Attendance at the Informal Hearing

PHA Policy

Hearings may be attended by a hearing officer and the following applicable persons:

San Francisco Housing Authority
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A PHA representative(s) and any witnesses for the PHA

The participant and any witnesses for the participant

The participant's counsel or other representative

Any other person approved by the PHA as a reasonable accommodation for a person with a disability

Conduct at Hearings

The person who conducts the hearing may regulate the conduct of the hearing in accordance with the PHA's hearing procedures [24 CFR 982.555(4)(ii)].

PHA Policy

The hearing officer is responsible to manage the order of business and to ensure that hearings are conducted in a professional and businesslike manner. Attendees are expected to comply with all hearing procedures established by the hearing officer and guidelines for conduct. Any person demonstrating disruptive, abusive or otherwise inappropriate behavior will be excused from the hearing at the discretion of the hearing officer.

Evidence [24 CFR 982.555(e)(5)]

The PHA and the family must be given the opportunity to present evidence and question any witnesses. In general, all evidence is admissible at an informal hearing. Evidence may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings.

PHA Policy

Any evidence to be considered by the hearing officer must be presented at the time of the hearing. There are four categories of evidence.

Oral evidence: the testimony of witnesses

Documentary evidence: a writing which is relevant to the case, for example, a letter written to the PHA. Writings include all forms of recorded communication or representation, including letters, words, pictures, sounds, videotapes or symbols or combinations thereof.

Demonstrative evidence: Evidence created specifically for the hearing and presented as an illustrative aid to assist the hearing officer, such as a model, a chart or other diagram.

Real evidence: A tangible item relating directly to the case.

Hearsay Evidence is evidence of a statement that was made other than by a witness while testifying at the hearing and that is offered to prove the truth of the matter. Even though evidence, including hearsay, is generally admissible, hearsay evidence alone cannot be used as the sole basis for the hearing officer's decision.

If either the PHA or the family fail to comply with the discovery requirements described above, the hearing officer will refuse to admit such evidence.

Other than the failure of a party to comply with discovery, the hearing officer has the authority to overrule any objections to evidence.

Hearing Officer's Decision [24 CFR 982.555(e)(6)]

The person who conducts the hearing must issue a written decision, stating briefly the reasons for the decision. Factual determinations relating to the individual circumstances of the family must be based on a preponderance of evidence presented at the hearing. A copy of the hearing must be furnished promptly to the family.

PHA Policy

In rendering a decision, the hearing officer will consider the following matters:

PHA Notice to the Family: The hearing officer will determine if the reasons for the PHA's decision are factually stated in the Notice.

Discovery: The hearing officer will determine if the PHA and the family were given the opportunity to examine any relevant documents in accordance with PHA policy.

PHA Evidence to Support the PHA Decision: The evidence consists of the facts presented. Evidence is not conclusion and it is not argument. The hearing officer will evaluate the facts to determine if they support the PHA's conclusion.

Validity of Grounds for Termination of Assistance (when applicable): The hearing officer will determine if the termination of assistance is for one of the grounds specified in the HUD regulations and PHA policies. If the grounds for termination are not specified in the regulations or in compliance with PHA policies, then the decision of the PHA will be overturned.

The hearing officer will issue a written decision to the family and the PHA no later than 10 business days after the hearing. The report will contain the following information:

Hearing information:

- Name of the participant;
- Date, time and place of the hearing;
- Name of the hearing officer;
- Name of the PHA representative; and
- Name of family representative (if any).

Background: A brief, impartial statement of the reason for the hearing.

Summary of the Evidence: The hearing officer will summarize the testimony of each witness and identify any documents that a witness produced in support of his/her testimony and that are admitted into evidence.

Findings of Fact: The hearing officer will include all findings of fact, based on a preponderance of the evidence. *Preponderance of the evidence* is defined as evidence which is of greater weight or more convincing than the evidence which

is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not. Preponderance of the evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

Conclusions: The hearing officer will render a conclusion derived from the facts that were found to be true by a preponderance of the evidence. The conclusion will result in a determination of whether these facts uphold the PHA's decision.

Order: The hearing report will include a statement of whether the PHA's decision is upheld or overturned. If it is overturned, the hearing officer will instruct the PHA to change the decision in accordance with the hearing officer's determination. In the case of termination of assistance, the hearing officer will instruct the PHA to restore the participant's program status.

Procedures for Rehearing or Further Hearing

PHA Policy

The hearing officer may ask the family for additional information and/or might adjourn the hearing in order to reconvene at a later date, before reaching a decision. If the family misses an appointment or deadline ordered by the hearing officer, the action of the PHA will take effect and another hearing will not be granted.

PHA Final Decision [24 CFR 982.555(f)]

The decision of the hearing officer is binding on the PHA which must take the action, or refrain from taking the action cited in the decision unless the Executive Director or his designee determines within a reasonable time, and notifies the complainant that:

- The grievance does not concern PHA action or failure to act in accordance with or involving the complainant's lease on PHA policies which adversely affect the complainant's rights, duties, welfare, or status; or
- The decision of the hearing officer/panel is contrary to Federal, State, or local law, HUD regulations or requirements of the annual contributions contract between HUD and the PHA.

If the PHA determines it is not bound by the hearing officer's decision in accordance with HUD regulations, the PHA must promptly notify the family of the determination and the reason for the determination.

PHA Policy

The PHA will mail the hearing officer's report to the participant and their representative.

16-III.D. HEARING AND APPEAL PROVISIONS FOR NON-CITIZENS [24 CFR 5.514]

Denial or termination of assistance based on immigration status is subject to special hearing and notice rules. Applicants who are denied assistance due to immigration status are entitled to an informal hearing, not an informal review.

Assistance to a family may not be delayed, denied, or terminated on the basis of immigration status at any time prior to a decision under the United States Citizenship and Immigration Services (USCIS) appeal process. Assistance to a family may not be terminated or denied while the PHA hearing is pending, but assistance to an applicant may be delayed pending the completion of the informal hearing.

A decision against a family member, issued in accordance with the USCIS appeal process or the PHA informal hearing process, does not preclude the family from exercising the right, that may otherwise be available, to seek redress directly through judicial procedures.

Notice of Denial or Termination of Assistance [24 CFR 5.514(d)]

As discussed in Chapters 3 and 11, the notice of denial or termination of assistance for noncitizens must advise the family:

- That financial assistance will be denied or terminated, and provide a brief explanation of the reasons for the proposed denial or termination of assistance.
- The family may be eligible for proration of assistance.
- In the case of a participant, the criteria and procedures for obtaining relief under the provisions for preservation of families [24 CFR 5.514 and 5.518].
- That the family has a right to request an appeal to the USCIS of the results of secondary verification of immigration status and to submit additional documentation or explanation in support of the appeal.
- That the family has a right to request an informal hearing with the PHA either upon completion of the USCIS appeal or in lieu of the USCIS appeal.
- For applicants, assistance may not be delayed until the conclusion of the USCIS appeal process, but assistance may be delayed during the period of the informal hearing process.

USCIS Appeal Process [24 CFR 5.514(e)]

When the PHA receives notification that the USCIS secondary verification failed to confirm eligible immigration status, the PHA must notify the family of the results of the USCIS verification. The family will have 30 days from the date of the notification to request an appeal of the USCIS results. The request for appeal must be made by the family in writing directly to the USCIS. The family must provide the PHA with a copy of the written request for appeal and the proof of mailing.

PHA Policy

The PHA will notify the family in writing of the results of the USCIS secondary verification within 10 business days of receiving the results.

The family must provide the PHA with a copy of the written request for appeal and proof of mailing within 10 business days of sending the request to the USCIS.

The family must forward to the designated USCIS office any additional documentation or written explanation in support of the appeal. This material must include a copy of the USCIS document verification request (used to process the secondary request) or such other form specified by the USCIS, and a letter indicating that the family is requesting an appeal of the USCIS immigration status verification results.

The USCIS will notify the family, with a copy to the PHA, of its decision. When the USCIS notifies the PHA of the decision, the PHA must notify the family of its right to request an informal hearing.

PHA Policy

The PHA will send written notice to the family of its right to request an informal hearing within 10 business days of receiving notice of the USCIS decision regarding the family's immigration status.

Informal Hearing Procedures for Applicants [24 CFR 5.514(f)]

After notification of the USCIS decision on appeal, or in lieu of an appeal to the USCIS, the family may request that the PHA provide a hearing. The request for a hearing must be made either within 30 days of receipt of the PHA notice of denial, or within 30 days of receipt of the USCIS appeal decision.

The informal hearing procedures for applicant families are described below.

Informal Hearing Officer

The PHA must provide an informal hearing before an impartial individual, other than a person who made or approved the decision under review, and other than a person who is a subordinate of the person who made or approved the decision. See Section 16-III.C. for a listing of positions that serve as informal hearing officers.

Evidence

The family must be provided the opportunity to examine and copy at the family's expense, at a reasonable time in advance of the hearing, any documents in the possession of the PHA pertaining to the family's eligibility status, or in the possession of the USCIS (as permitted by USCIS requirements), including any records and regulations that may be relevant to the hearing.

PHA Policy

The family will be allowed to copy any documents related to the hearing at a cost of \$.25 per page. The family must request discovery of PHA documents no later than 12:00 p.m. on the business day prior to the hearing.

The family must be provided the opportunity to present evidence and arguments in support of eligible status. Evidence may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings.

The family must also be provided the opportunity to refute evidence relied upon by the PHA, and

to confront and cross-examine all witnesses on whose testimony or information the PHA relies.

Representation and Interpretive Services

The family is entitled to be represented by an attorney or other designee, at the family's expense, and to have such person make statements on the family's behalf.

The family is entitled to arrange for an interpreter to attend the hearing, at the expense of the family, or the PHA, as may be agreed upon by the two parties.

Recording of the Hearing

The family is entitled to have the hearing recorded by audiotape. The PHA may, but is not required to provide a transcript of the hearing.

PHA Policy

The family is entitled to have the hearing recorded by a digital recorder upon request. A copy of the hearing is available on cd for \$5.00.

Hearing Decision

The PHA must provide the family with a written final decision, based solely on the facts presented at the hearing, within 14 calendar days of the date of the informal hearing. The decision must state the basis for the decision.

Informal Hearing Procedures for Residents [24 CFR 5.514(f)]

After notification of the USCIS decision on appeal, or in lieu of an appeal to the USCIS, the family may request that the PHA provide a hearing. The request for a hearing must be made either within 30 days of receipt of the PHA notice of termination, or within 30 days of receipt of the USCIS appeal decision.

For the informal hearing procedures that apply to participant families whose assistance is being terminated based on immigration status, see Section 16-III.C.

Retention of Documents [24 CFR 5.514(h)]

The PHA must retain for a minimum of 5 years the following documents that may have been submitted to the PHA by the family, or provided to the PHA as part of the USCIS appeal or the PHA informal hearing process:

- The application for assistance
- The form completed by the family for income reexamination
- Photocopies of any original documents, including original USCIS documents
- The signed verification consent form
- The USCIS verification results
- The request for a USCIS appeal
- The final USCIS determination

- The request for an informal hearing
- The final informal hearing decision

PART IV: OWNER OR FAMILY DEBTS TO THE PHA

16-IV.A. OVERVIEW

PHAs are required to include in the administrative plan, policies concerning repayment by a family of amounts owed to the PHA [24 CFR 982.54]. This part describes the PHA's policies for recovery of monies owed to the PHA by families or owners.

PHA Policy

When an action or inaction of an owner or participant results in the overpayment of housing assistance, the PHA holds the owner or participant liable to return any overpayments to the PHA.

The PHA will enter into repayment agreements in accordance with the policies contained in this part as a means to recover overpayments.

When an owner or participant refuses to repay monies owed to the PHA, the PHA will utilize other available collection alternatives including, but not limited to, the following:

- Collection agencies
- Small claims court
- Civil law suit
- State income tax set-off program

16-IV.B. REPAYMENT POLICY

Owner Debts to the PHA

PHA Policy

Any amount due to the PHA by an owner must be repaid by the owner within 30 days of the PHA determination of the debt.

If the owner fails to repay the debt within the required time frame and is entitled to future HAP payments, the PHA will reduce the future HAP payments by the amount owed until the debt is paid in full.

If the owner is not entitled to future HAP payments the PHA may, in its sole discretion, offer to enter into a repayment agreement on terms prescribed by the PHA.

If the owner refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement, the PHA will ban the owner from future participation in the program and pursue other modes of collection.

Family Debts to the PHA

PHA Policy

Any amount owed to the PHA by an HCV family must be repaid by the family. If the family is unable to repay the debt within 30 days, the PHA will offer to enter into a repayment agreement in accordance with the policies below.

If the family refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement, the PHA will terminate assistance in accordance with the policies in Chapter 12 and pursue other modes of collection.

Repayment Agreement [24 CFR 792.103]

The term *repayment agreement* refers to a formal written document signed by a tenant or owner and provided to the PHA in which a tenant or owner acknowledges a debt in a specific amount and agrees to repay the amount due at specific time periods.

General Repayment Agreement Guidelines for Families

Down Payment Requirement

PHA Policy

Before executing a repayment agreement with a family, the PHA will generally require a down payment of 10 percent of the total amount owed. If the family can provide evidence satisfactory to the PHA that a down payment of 10 percent would impose an undue hardship, the PHA may, in its sole discretion, require a lesser percentage or waive the requirement.

Payment Thresholds

Notice PIH 2010-19 recommends that the total amount that a family must pay each month—the family’s monthly share of rent plus the monthly debt repayment amount—should not exceed 40 percent of the family’s monthly adjusted income. However, a family may already be paying 40 per cent or more of its monthly adjusted income in rent. Moreover, Notice PIH 2010-19 acknowledges that PHAs have the discretion to establish “thresholds and policies” for repayment agreements with families [24 CFR 982.552(c)(1)(vii)].

PHA Policy

The PHA has established the following thresholds for repayment of debts:

Amounts between \$3,000 and the federal or state threshold for criminal prosecution must be repaid within 36 months.

Amounts between \$2,000 and \$2,999 must be repaid within 30 months.

Amounts between \$1,000 and \$1,999 must be repaid within 24 months.

Amounts under \$1,000 must be repaid within 12 months.

If a family can provide evidence satisfactory to the PHA that the threshold applicable to the family’s debt would impose an undue hardship, the PHA may, in its sole discretion,

determine that a lower monthly payment amount is reasonable. In making its determination, the PHA will consider all relevant information, including the following:

The amount owed by the family to the PHA

The reason for the debt, including whether the debt was the result of family action/inaction or circumstances beyond the family's control

The family's current and potential income and expenses

The family's current family share, as calculated under 24 CFR 982.515

The family's history of meeting its financial responsibilities

Execution of the Agreement

PHA Policy

Any repayment agreement between the PHA and a family must be signed and dated by the PHA and by the head of household and spouse/cohead (if applicable).

Due Dates

PHA Policy

All payments are due by the close of business on the 15th day of the month. If the 15th does not fall on a business day, the due date is the close of business on the first business day after the 15th.

Late or Missed Payments

PHA Policy

If a payment is not received by the end of the business day on the date due, and prior approval for the missed payment has not been given by the PHA, the PHA will send the family a delinquency notice giving the family 10 business days to make the late payment. If the payment is not received by the due date of the delinquency notice, it will be considered a breach of the agreement and the PHA will terminate assistance in accordance with the policies in Chapter 12.

If a family receives three delinquency notices for unexcused late payments in a 12-month period, the repayment agreement will be considered in default, and the PHA will terminate assistance in accordance with the policies in Chapter 12.

No Offer of Repayment Agreement

PHA Policy

The PHA generally will not enter into a repayment agreement with a family if there is already a repayment agreement in place with the family or if the amount owed by the family exceeds the federal or state threshold for criminal prosecution.

Repayment Agreements Involving Improper Payments

Notice PIH 2010-19 requires certain provisions to be included in any repayment agreement involving amounts owed by a family because it underreported or failed to report income:

- A reference to the items in the family briefing packet that state the family's obligation to provide true and complete information at every reexamination and the grounds on which the PHA may terminate assistance because of a family's action or failure to act
- A statement clarifying that each month the family not only must pay to the PHA the monthly payment amount specified in the agreement but must also pay to the owner the family's monthly share of the rent to owner
- A statement that the terms of the repayment agreement may be renegotiated if the family's income decreases or increases
- A statement that late or missed payments constitute default of the repayment agreement and may result in termination of assistance

PART V: MANAGEMENT ASSESSMENT (SEMAP)

16-V.A. OVERVIEW

The Section 8 Management Assessment Program (SEMAP) is a tool that allows HUD to measure PHA performance in key areas to ensure program integrity and accountability. SEMAP scores translate into a rating for each PHA as high performing, standard, or troubled. Scores on individual SEMAP indicators, as well as overall SEMAP ratings, can affect the PHA in several ways.

- High-performing PHAs can be given a competitive advantage under notices of funding availability [24 CFR 985.103].
- PHAs with deficiencies on one or more indicators are required to correct the deficiencies and report to HUD [24 CFR 985.106].
- PHAs with an overall rating of “troubled” are subject to additional HUD oversight, including on-site reviews by HUD staff, a requirement to develop a corrective action plan, and monitoring to ensure the successful implementation of the corrective action plan. In addition, PHAs that are designated “troubled” may not use any part of the administrative fee reserve for other housing purposes [24 CFR 985.107].
- HUD may determine that a PHA's failure to correct identified SEMAP deficiencies or to prepare and implement a corrective action plan required by HUD constitutes a default under the ACC [24 CFR 985.109].

16-V.B. SEMAP CERTIFICATION [24 CFR 985.101]

PHAs must submit the HUD-required SEMAP certification form within 60 calendar days after the end of its fiscal year. The certification must be approved by PHA board resolution and signed by the PHA executive director. If the PHA is a unit of local government or a state, a resolution approving the certification is not required, and the certification must be executed by the Section 8 program director.

PHAs with less than 250 voucher units are only required to be assessed every other PHA fiscal year. HUD will assess such PHAs annually if the PHA elects to have its performance assessed on an annual basis; or is designated as “troubled” [24 CFR 985.105].

Failure of a PHA to submit its SEMAP certification within the required time frame will result in an overall performance rating of “troubled.”

A PHA's SEMAP certification is subject to HUD verification by an on-site confirmatory review at any time.

Upon receipt of the PHA's SEMAP certification, HUD will rate the PHA's performance under each SEMAP indicator in accordance with program requirements.

HUD Verification Method

Several of the SEMAP indicators are scored based on a review of a quality control sample selected for this purpose. The PHA or the Independent Auditor must select an unbiased sample

that provides an adequate representation of the types of information to be assessed, in accordance with SEMAP requirements [24 CFR 985.2].

If the HUD verification method for the indicator relies on data in the Form-50058 module (formerly known as MTCS) in the PIH Information Center (PIC), and HUD determines that those data are insufficient to verify the PHA's certification on the indicator due to the PHA's failure to adequately report family data, HUD will assign a zero rating for the indicator [24 CFR 985.3].

16-V.C. SEMAP INDICATORS [24 CFR 985.3 and form HUD-52648]

The table below lists each of the SEMAP indicators, contains a description of each indicator, and explains the basis for points awarded under each indicator.

A PHA that expends less than \$300,000 in Federal awards and whose Section 8 programs are not audited by an independent auditor, is not be rated under SEMAP indicators 1-7.

SEMAP Indicators
<p>Indicator 1: Selection from the waiting list Maximum Score: 15</p> <ul style="list-style-type: none"> • This indicator shows whether the PHA has written policies in its administrative plan for selecting applicants from the waiting list and whether the PHA follows these policies when selecting applicants for admission from the waiting list. • Points are based on the percent of families that are selected from the waiting list in accordance with the PHA's written policies, according to the PHA's quality control sample.
<p>Indicator 2: Rent reasonableness Maximum Score: 20</p> <ul style="list-style-type: none"> • This indicator shows whether the PHA has and implements a reasonable written method to determine and document for each unit leased that the rent to owner is reasonable based on current rents for comparable unassisted units • Points are based on the percent of units for which the PHA follows its written method to determine reasonable rent and has documented its determination that the rent to owner is reasonable, according to the PHA's quality control sample.
<p>Indicator 3: Determination of adjusted income Maximum Score: 20</p> <ul style="list-style-type: none"> • This indicator measures whether the PHA verifies and correctly determines adjusted income for each assisted family, and where applicable, uses the appropriate utility allowances for the unit leased in determining the gross rent. • Points are based on the percent of files that are calculated and verified correctly, according to the PHA's quality control sample.
<p>Indicator 4: Utility allowance schedule Maximum Score: 5</p> <ul style="list-style-type: none"> • This indicator shows whether the PHA maintains an up-to-date utility allowance schedule. • Points are based on whether the PHA has reviewed the utility allowance schedule and adjusted it when required, according to the PHA's certification.

Indicator 5: HQS quality control inspections**Maximum Score: 5**

- This indicator shows whether a PHA supervisor reinspects a sample of units under contract during the PHA fiscal year, which meets the minimum sample size requirements for quality control of HQS inspections.
- Points are based on whether the required quality control reinspections were completed, according to the PHA's certification.

Indicator 6: HQS enforcement**Maximum Score: 10**

- This indicator shows whether, following each HQS inspection of a unit under contract where the unit fails to meet HQS, any cited life-threatening deficiencies are corrected within 24 hours from the inspection and all other deficiencies are corrected within no more than 30 calendar days from the inspection or any PHA-approved extension.
- Points are based on whether the PHA corrects all HQS deficiencies in accordance with required time frames, according to the PHA's certification.

Indicator 7: Expanding housing opportunities**Maximum Points: 5**

- Only applies to PHAs with jurisdiction in metropolitan FMR areas.
- This indicator shows whether the PHA has adopted and implemented a written policy to encourage participation by owners of units located outside areas of poverty or minority concentration; informs voucher holders of the full range of areas where they may lease units both inside and outside the PHA's jurisdiction; and supplies a list of landlords or other parties who are willing to lease units or help families find units, including units outside areas of poverty or minority concentration.
- Points are based on whether the PHA has adopted and implemented written policies in accordance with SEMAP requirements, according to the PHA's certification.

Indicator 8: FMR limit and payment standards**Maximum Points: 5 points**

- This indicator shows whether the PHA has adopted a payment standard schedule that establishes payment standard amounts by unit size for each FMR area in the PHA's jurisdiction, that are within the basic range of 90 to 110 percent of the published FMR.
- Points are based on whether the PHA has appropriately adopted a payment standard schedule(s), according to the PHA's certification.

Indicator 9: Annual reexaminations**Maximum Points: 10**

- This indicator shows whether the PHA completes a reexamination for each participating family at least every 12 months.

- Points are based on the percent of reexaminations that are more than 2 months overdue, according to data from PIC.

Indicator 10: Correct tenant rent calculations

Maximum Points: 5

- This indicator shows whether the PHA correctly calculates the family's share of the rent to owner.
- Points are based on the percent of correct calculations of family share of the rent, according to data from PIC.

Indicator 11: Pre-contract HQS inspections

Maximum Points: 5

- This indicator shows whether newly leased units pass HQS inspection on or before the effective date of the assisted lease and HAP contract.
- Points are based on the percent of newly leased units that passed HQS inspection prior to the effective date of the lease and HAP contract, according to data from PIC.

Indicator 12: Annual HQS inspections

Maximum Points: 10

- This indicator shows whether the PHA inspects each unit under contract at least annually.
- Points are based on the percent of annual HQS inspections of units under contract that are more than 2 months overdue, according to data from PIC.

Indicator 13: Lease-up

Maximum Points: 20 points

- This indicator shows whether the PHA enters HAP contracts for the number of units or funding reserved under ACC for at least one year.
- Points are based on the percent of units leased during the last completed PHA fiscal year, or the percent of allocated budget authority that has been expended by the PHA, according to data from the PHA's last year-end operating statement that is recorded in HUD's accounting system.

Indicator 14: Family self-sufficiency (FSS) enrollment and escrow account balances

Maximum Points: 10

- Only applies to PHAs with mandatory FSS programs.
- This indicator shows whether the PHA has enrolled families in the FSS program as required, and measures the percent of current FSS participants that have had increases in earned income which resulted in escrow account balances.
- Points are based on the percent of mandatory FSS slots that are filled and the percent of

families with escrow account balances, according to data from PIC.

Success Rate of Voucher Holders

Maximum Points: 5

- Only applies to PHAs that have received approval to establish success rate payment standard amounts, and isn't effective until the second full PHA fiscal year following the date of HUD approval of success rate payment standard amounts.
- This indicator shows whether voucher holders were successful in leasing units with voucher assistance.
- Points are based on the percent of families that were issued vouchers, and that became participants in the voucher program.

Deconcentration Bonus Indicator

Maximum Points: 5

- Submission of data for this indicator is mandatory for a PHA using one or more payment standard amount(s) that exceed(s) 100 percent of the published FMR set at the 50 percentile rent, starting with the second full PHA fiscal year following initial use of payment standard amounts based on the FMRs set at the 50th percentile.
- Additional points are available to PHAs that have jurisdiction in metropolitan FMR areas and that choose to submit the required data.
- Points are based on whether the data that is submitted meets the requirements for bonus points.

PART VI: RECORD KEEPING

16-VI.A. OVERVIEW

The PHA must maintain complete and accurate accounts and other records for the program in accordance with HUD requirements, in a manner that permits a speedy and effective audit. All such records must be made available to HUD or the Comptroller General of the United States upon request.

In addition, the PHA must ensure that all applicant and participant files are maintained in a way that protects an individual's privacy rights.

16-VI.B. RECORD RETENTION [24 CFR 982.158]

During the term of each assisted lease, and for at least three years thereafter, the PHA must keep:

- A copy of the executed lease;
- The HAP contract; and
- The application from the family.

In addition, the PHA must keep the following records for at least three years:

- Records that provide income, racial, ethnic, gender, and disability status data on program applicants and participants;
- An application from each ineligible family and notice that the applicant is not eligible;
- HUD-required reports;
- Unit inspection reports;
- Lead-based paint records as required by 24 CFR 35, Subpart B.
- Accounts and other records supporting PHA budget and financial statements for the program;
- Records to document the basis for PHA determination that rent to owner is a reasonable rent (initially and during the term of a HAP contract); and
- Other records specified by HUD.

If an informal hearing to establish a family's citizenship status is held, longer retention requirements apply for some types of documents. For specific requirements, see Section 16-III.D., Retention of Documents.

16-VI.C. RECORDS MANAGEMENT

PHAs must maintain applicant and participant files and information in accordance with the regulatory requirements described below.

PHA Policy

All applicant and participant information will be kept in a secure location and access will be limited to authorized PHA staff.

PHA staff will not discuss personal family information unless there is a business reason to do so. Inappropriate discussion of family information or improper disclosure of family information by staff will result in disciplinary action.

Privacy Act Requirements [24 CFR 5.212 and Form-9886]

The collection, maintenance, use, and dissemination of social security numbers (SSN), employer identification numbers (EIN), any information derived from these numbers, and income information of applicants and participants must be conducted, to the extent applicable, in compliance with the Privacy Act of 1974, and all other provisions of Federal, State, and local law.

Applicants and participants, including all adults in the household, are required to sign a consent form, HUD-9886, Authorization for Release of Information. This form incorporates the Federal Privacy Act Statement and describes how the information collected using the form may be used, and under what conditions HUD or the PHA may release the information collected.

Upfront Income Verification (UIV) Records

PHAs that access UIV data through HUD's Enterprise Income Verification (EIV) System are required to adopt and follow specific security procedures to ensure that all EIV data is protected in accordance with Federal laws, regardless of the media on which the data is recorded (e.g. electronic, paper). These requirements are contained in the HUD issued document, *Enterprise Income Verification (EIV) System, Security Procedures for Upfront Income Verification data*.

PHA Policy

Prior to utilizing HUD's EIV system, the PHA will adopt and implement EIV security procedures required by HUD.

Criminal Records

The PHA may only disclose the criminal conviction records which the PHA receives from a law enforcement agency to officers or employees of the PHA, or to authorized representatives of the PHA who have a job-related need to have access to the information [24 CFR 5.903(e)].

The PHA must establish and implement a system of records management that ensures that any criminal record received by the PHA from a law enforcement agency is maintained confidentially, not misused or improperly disseminated, and destroyed, once the purpose for which the record was requested has been accomplished, including expiration of the period for filing a challenge to the PHA action without institution of a challenge or final disposition of any such litigation [24 CFR 5.903(g)].

The PHA must establish and implement a system of records management that ensures that any sex offender registration information received by the PHA from a State or local agency is maintained confidentially, not misused or improperly disseminated, and destroyed, once the purpose for which the record was requested has been accomplished, including expiration of the period for filing a challenge to the PHA action without institution of a challenge or final disposition of any such litigation. This requirement does not apply to information that is public information, or is obtained by a PHA other than under 24 CFR 5.905.

Medical/Disability Records

PHAs are not permitted to inquire about the nature or extent of a person's disability. The PHA may not inquire about a person's diagnosis or details of treatment for a disability or medical condition. If the PHA receives a verification document that provides such information, the PHA should not place this information in the tenant file. The PHA should destroy the document.

PART VII: REPORTING AND RECORD KEEPING FOR CHILDREN WITH ENVIRONMENTAL INTERVENTION BLOOD LEAD LEVEL

16-VII.A. OVERVIEW

The PHA has certain responsibilities relative to children with environmental intervention blood lead levels that are receiving HCV assistance. The notification, verification, and hazard reduction requirements are discussed in Chapter 8. This part deals with the reporting requirements, and data collection and record keeping responsibilities that the PHA is subject to.

16-VII.B. REPORTING REQUIREMENT [24 CFR 35.1225(e)]

The PHA must report the name and address of a child identified as having an environmental intervention blood lead level to the public health department within 5 business days of being so notified by any other medical health care professional.

PHA Policy

The PHA will provide the public health department written notice of the name and address of any child identified as having an environmental intervention blood lead level.

16-VII.C. DATA COLLECTION AND RECORD KEEPING [24 CFR 35.1225(f)]

At least quarterly, the PHA must attempt to obtain from the public health department(s) with a similar area of jurisdiction, the names and/or addresses of children less than 6 years old with an identified environmental intervention blood lead level.

If the PHA obtains names and addresses of environmental intervention blood lead level children from the public health department(s), the PHA must match this information with the names and addresses of families receiving HCV assistance, unless the public health department performs such a procedure. If a match occurs, the PHA must carry out the notification, verification, and hazard reduction requirements discussed in Chapter 8, and the reporting requirement discussed above.

At least quarterly, the PHA must also report an updated list of the addresses of units receiving assistance under the HCV program to the same public health department(s), unless the public health department(s) states that it does not wish to receive such a report.

PHA Policy

The public health department(s) has stated they **do not** wish to receive a report of an updated list of the addresses of units receiving assistance under the HCV program, on a quarterly basis. Therefore, the PHA is not providing such a report.

PART VIII: DETERMINATION OF INSUFFICIENT FUNDING

16-VIII.A. OVERVIEW

The HCV regulations allow PHAs to deny families permission to move and to terminate Housing Assistance Payment(s) (HAP) contracts if funding under the consolidated ACC is insufficient to support continued assistance [24 CFR 982.314(e)(1) and 982.454]. Insufficient funding may also impact the PHA's ability to issue vouchers to families on the waiting list. This part discusses the methodology the PHA will use to determine whether or not the PHA has sufficient funding to issue vouchers, approve moves, and to continue subsidizing all families currently under a HAP contract.

16-VIII.B. METHODOLOGY

PHA Policy

The PHA will determine whether there is adequate funding to issue vouchers, approve moves to higher cost units and areas, and continue subsidizing all current participants by comparing the PHA's annual budget authority to the annual total HAP needs on a monthly basis. The total HAP needs for the calendar year will be projected by establishing the actual HAP costs year to date. To that figure, the PHA will add anticipated HAP expenditures for the remainder of the calendar year. Projected HAP expenditures will be calculated by multiplying the projected number of units leased per remaining months by the most current month's average HAP. The projected number of units leased per month will take into account the average monthly turnover of participant families. If the total annual HAP needs equal or exceed the annual budget authority, or if the PHA cannot support the cost of the proposed subsidy commitment (voucher issuance or move) based on the funding analysis, the PHA will be considered to have insufficient funding.

**PART IX: NOTIFICATION REGARDING APPLICABLE PROVISIONS OF THE
VIOLENCE AGAINST WOMEN REAUTHORIZATION ACT OF 2005 (VAWA)**

The Violence against Women Reauthorization Act of 2005 (VAWA) requires PHAs to inform assisted tenants of their rights under this law, including their right to confidentiality and the limits thereof. Since VAWA provides protections for applicants as well as tenants, PHAs may elect to provide the same information to applicants. VAWA also requires PHAs to inform owners and managers of their obligations under this law [24 CFR 5.2007(3)].

This part describes the steps that the PHA will take to ensure that all actual and potential beneficiaries of its housing choice voucher program are notified about their rights and that owners and managers are notified of their obligations under VAWA.

PHA Policy

The PHA will post the following information regarding VAWA in its offices and on its Web site. It will also make the information readily available to anyone who requests it.

A summary of the rights and protections provided by VAWA to housing choice voucher program applicants and participants who are or have been victims of domestic violence, dating violence, or stalking (see sample notices in Exhibits 16-1 and 16-2)

The definitions of *domestic violence*, *dating violence*, and *stalking* provided in VAWA (included in Exhibits 16-1 and 16-2)

An explanation of the documentation that the PHA may require from an individual who claims the protections provided by VAWA (included in Exhibits 16-1 and 16-2)

A copy of form HUD-50066, Certification of Domestic Violence, Dating Violence, or Stalking

A statement of the PHA's obligation to keep confidential any information that it receives from a victim unless (a) the PHA has the victim's written permission to release the information, (b) it needs to use the information in an eviction proceeding, or (c) it is compelled by law to release the information (included in Exhibits 16-1 and 16-2)

The National Domestic Violence Hot Line: 1-800-799-SAFE (7233) or 1-800-787-3224 (TTY) (included in Exhibits 16-1 and 16-2)

Contact information for local victim advocacy groups or service providers

16-IX.A. NOTIFICATION TO PARTICIPANTS [24 CFR 5.2007(3)(i)]

VAWA requires PHAs to notify HCV program participants of their rights under this law, including their right to confidentiality and the limits thereof.

PHA Policy

The PHA will provide all participants with notification of their protections and rights under VAWA at the time of admission and at annual reexamination.

The notice will explain the protections afforded under the law, inform the participant of PHA confidentiality requirements, and provide contact information for local victim advocacy groups or service providers.

The PHA will also include in all assistance termination notices a statement explaining assistance termination protection provided by VAWA (see Section 12-II.E).

16-IX.B. NOTIFICATION TO APPLICANTSPHA Policy

The PHA will provide all applicants with notification of their protections and rights under VAWA at the time they request an application for housing assistance.

The notice will explain the protections afforded under the law, inform each applicant of PHA confidentiality requirements, and provide contact information for local victim advocacy groups or service providers.

The PHA will also include in all notices of denial a statement explaining the protection against denial provided by VAWA (see section 3-III.G).

16-IX.C. NOTIFICATION TO OWNERS AND MANAGERS [24 CFR 5.2007(3)(ii)]

VAWA requires PHAs to notify owners and managers of their rights and responsibilities under this law.

PHA Policy

Inform property owners and managers of their screening and termination responsibilities related to VAWA. The PHA may utilize any or all of the following means to notify owners of their VAWA responsibilities:

As appropriate in day to day interactions with owners and managers.

Inserts in HAP payments, 1099s, owner workshops, classes, orientations, and/or newsletters.

Signs in the PHA lobby and/or mass mailings which include model VAWA certification forms

EXHIBIT 16-1: SAMPLE NOTICE TO HOUSING CHOICE VOUCHER APPLICANTS AND TENANTS REGARDING THE VIOLENCE AGAINST WOMEN ACT (VAWA)

This sample notice was adapted from a notice prepared by the National Housing Law Project.

A federal law that went into effect in 2006 protects individuals who are victims of domestic violence, dating violence, and stalking. The name of the law is the Violence against Women Act, or “VAWA.” This notice explains your rights under VAWA.

Protections for Victims

If you are eligible for a Section 8 voucher, the housing authority cannot deny you rental assistance solely because you are a victim of domestic violence, dating violence, or stalking.

If you are the victim of domestic violence, dating violence, or stalking, you cannot be terminated from the Section 8 program or evicted based on acts or threats of violence committed against you. Also, criminal acts directly related to the domestic violence, dating violence, or stalking that are caused by a member of your household or a guest can’t be the reason for evicting you or terminating your rental assistance if you were the victim of the abuse.

Reasons You Can Be Evicted

You can be evicted and your rental assistance can be terminated if the housing authority or your landlord can show there is an *actual* and *imminent* (immediate) threat to other tenants or employees at the property if you remain in your housing. Also, you can be evicted and your rental assistance can be terminated for serious or repeated lease violations that are not related to the domestic violence, dating violence, or stalking committed against you. The housing authority and your landlord cannot hold you to a more demanding set of rules than it applies to tenants who are not victims.

Removing the Abuser from the Household

Your landlord may split the lease to evict a tenant who has committed criminal acts of violence against family members or others, while allowing the victim and other household members to stay in the assisted unit. Also, the housing authority can terminate the abuser’s Section 8 rental assistance while allowing you to continue to receive assistance. If the landlord or housing authority chooses to remove the abuser, it may not take away the remaining tenants’ rights to the unit or otherwise punish the remaining tenants. In removing the abuser from the household, your landlord must follow federal, state, and local eviction procedures.

Moving to Protect Your Safety

The housing authority may permit you to move and still keep your rental assistance, even if your current lease has not yet expired. The housing authority may require that you be current on your rent or other obligations in the housing choice voucher program. The housing authority may ask you to provide proof that you are moving because of incidences of abuse.

Proving that You Are a Victim of Domestic Violence, Dating Violence, or Stalking

The housing authority and your landlord can ask you to prove or “certify” that you are a victim of domestic violence, dating violence, or stalking. The housing authority you’re your landlord must give you at least 14 business days (i.e. Saturdays, Sundays, and holidays do not count) to provide this proof. The housing authority and your landlord are free to extend the deadline. There are three ways you can prove that you are a victim:

Complete the certification form given to you by the housing authority or your landlord. The form will ask for your name, the name of your abuser, the abuser’s relationship to you, the date, time, and location of the incident of violence, and a description of the violence.

Provide a statement from a victim service provider, attorney, or medical professional who has helped you address incidents of domestic violence, dating violence, or stalking. The professional must state that he or she believes that the incidents of abuse are real. Both you and the professional must sign the statement, and both of you must state that you are signing “under penalty of perjury.”

Provide a police or court record, such as a protective order.

If you fail to provide one of these documents within the required time, the landlord may evict you, and the housing authority may terminate your rental assistance.

Confidentiality

The housing authority and your landlord must keep confidential any information you provide about the violence against you, unless:

You give written permission to the housing authority or your landlord to release the information.

Your landlord needs to use the information in an eviction proceeding, such as to evict your abuser.

A law requires the housing authority or your landlord to release the information.

If release of the information would put your safety at risk, you should inform the housing authority and your landlord.

VAWA and Other Laws

VAWA does not limit the housing authorities or your landlord’s duty to honor court orders about access to or control of the property. This includes orders issued to protect a victim and orders dividing property among household members in cases where a family breaks up.

VAWA does not replace any federal, state, or local law that provides greater protection for victims of domestic violence, dating violence, or stalking.

For Additional Information

If you have any questions regarding VAWA, please contact _____ at _____.

For help and advice on escaping an abusive relationship, call the National Domestic Violence Hotline at 1-800-799-SAFE (7233) or 1-800-787-3224 (TTY).

Definitions

For purposes of determining whether a tenant may be covered by VAWA, the following list of definitions applies:

VAWA defines *domestic violence* to include felony or misdemeanor crimes of violence committed by any of the following:

A current or former spouse of the victim

A person with whom the victim shares a child in common

A person who is cohabitating with or has cohabitated with the victim as a spouse

A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies

Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction

VAWA defines *dating violence* as violence committed by a person (1) who is or has been in a social relationship of a romantic or intimate nature with the victim AND (2) where the existence of such a relationship shall be determined based on a consideration of the following factors:

The length of the relationship

The type of relationship

The frequency of interaction between the persons involved in the relationship

VAWA defines *stalking* as (A)(i) to follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate another person OR (ii) to place under surveillance with the intent to kill, injure, harass, or intimidate another person AND (B) in the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to (i) that person, (ii) a member of the immediate family of that person, or (iii) the spouse or intimate partner of that person.

<p>EXHIBIT 16-2: SAMPLE NOTICE TO HOUSING CHOICE VOUCHER OWNERS AND MANAGERS REGARDING THE VIOLENCE AGAINST WOMEN ACT (VAWA)</p>

This sample notice was adapted from a notice prepared by the National Housing Law Project.

A federal law that went into effect in 2006 protects individuals who are victims of domestic violence, dating violence, and stalking. The name of the law is the Violence against Women Act, or “VAWA.” This notice explains your obligations under VAWA.

Protections for Victims

You cannot refuse to rent to an applicant solely because he or she is a victim of domestic violence, dating violence, or stalking.

You cannot evict a tenant who is the victim of domestic violence, dating violence, or stalking based on acts or threats of violence committed against the victim. Also, criminal acts directly related to the domestic violence, dating violence, or stalking that are caused by a household member or guest cannot be cause for evicting the victim of the abuse.

Permissible Evictions

You can evict a victim of domestic violence, dating violence, or stalking if you can demonstrate that there is an *actual* or *imminent* (immediate) threat to other tenants or employees at the property if the victim is not evicted. Also, you may evict a victim for serious or repeated lease violations that are not related to the domestic violence, dating violence, or stalking. You cannot hold a victim of domestic violence, dating violence, or stalking to a more demanding standard than tenants who are not victims.

Removing the Abuser from the Household

You may split the lease to evict a tenant who has committed criminal acts of violence against family members or others, while allowing the victim and other household members to stay in the unit. If you choose to remove the abuser, you may not take away the remaining tenants’ rights to the unit or otherwise punish the remaining tenants. In removing the abuser from the household, you must follow federal, state, and local eviction procedures.

Certification of Domestic Violence, Dating Violence, or Stalking

If a tenant asserts VAWA’s protections, you can ask the tenant to certify that he or she is a victim of domestic violence, dating violence, or stalking. You are not required to demand official documentation and may rely upon the victim’s statement alone. If you choose to request certification, you must do so in writing and give the tenant at least 14 business days to provide documentation. You are free to extend this deadline. A tenant can certify that he or she is a victim by providing any one of the following three documents:

By completing a HUD-approved certification form. The most recent form is HUD-50066. This form is available at the housing authority, or online at <http://www.hud.gov/offices/adm/hudclips/>.

By providing a statement from a victim service provider, attorney, or medical professional who has helped the victim address incidents of domestic violence, dating violence, or stalking.

The professional must state that he or she believes that the incidents of abuse are real. Both the victim and the professional must sign the statement under penalty of perjury.

By providing a police or court record, such as a protective order.

If the tenant fails to provide one of these documents within 14 business days, you may evict the tenant if authorized by otherwise applicable law and lease provisions.

Confidentiality

You must keep confidential any information a tenant provides to certify that he or she is a victim of domestic violence, dating violence, or stalking. You cannot enter the information into a shared database or reveal it to outside entities unless:

The tenant provides written permission releasing the information.

The information is required for use in an eviction proceeding, such as to evict the abuser.

Release of the information is otherwise required by law.

The victim should inform you if the release of the information would put his or her safety at risk.

VAWA and Other Laws

VAWA does not limit your obligation to honor court orders regarding access to or control of the property. This includes orders issued to protect the victim and orders dividing property among household members in cases where a family breaks up.

VAWA does not replace any federal, state, or local law that provides greater protection for victims of domestic violence, dating violence, or stalking.

Additional Information

If you have any questions regarding VAWA, please contact _____.

HUD Notice PIH 2006-42 contains detailed information regarding VAWA's certification requirements. The notice is available at <http://www.hud.gov/offices/adm/hudclips/>.

An overview of VAWA's housing provisions is available at <http://edocket.access.gpo.gov/2007/pdf/E7-4795.pdf>.

Definitions

For purposes of determining whether a tenant may be covered by VAWA, the following list of definitions applies:

VAWA defines *domestic violence* to include felony or misdemeanor crimes of violence committed by any of the following:

A current or former spouse of the victim

A person with whom the victim shares a child in common

A person who is cohabitating with or has cohabitated with the victim as a spouse

A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies

Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction

VAWA defines *dating violence* as violence committed by a person (1) who is or has been in a social relationship of a romantic or intimate nature with the victim AND (2) where the existence of such a relationship shall be determined based on a consideration of the following factors:

The length of the relationship

The type of relationship

The frequency of interaction between the persons involved in the relationship

VAWA defines *stalking* as (A)(i) to follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate another person OR (ii) to place under surveillance with the intent to kill, injure, harass, or intimidate another person AND (B) in the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to (i) that person, (ii) a member of the immediate family of that person, or (iii) the spouse or intimate partner of that person.

Chapter 17

PROJECT-BASED VOUCHERS

INTRODUCTION

This chapter describes HUD regulations and PHA policies related to the project-based voucher (PBV) program in nine parts:

Part I: General Requirements. This part describes general provisions of the PBV program including maximum budget authority requirements, relocation requirements, and equal opportunity requirements.

Part II: PBV Owner Proposals. This part includes policies related to the submission and selection of owner proposals for PBV assistance. It describes the factors the PHA will consider when selecting proposals, the type of housing that is eligible to receive PBV assistance, the cap on assistance at projects receiving PBV assistance, subsidy layering requirements, site selection standards, and environmental review requirements.

Part III: Dwelling Units. This part describes requirements related to housing quality standards, the type and frequency of inspections, and housing accessibility for persons with disabilities.

Part IV: Rehabilitated and Newly Constructed Units. This part describes requirements and policies related to the development and completion of rehabilitated and newly constructed housing units that will be receiving PBV assistance.

Part V: Housing Assistance Payments Contract. This part discusses HAP contract requirements and policies including the execution, term, and termination of the HAP contract. In addition, it describes how the HAP contract may be amended and identifies provisions that may be added to the HAP contract at the PHA's discretion.

Part VI: Selection of PBV Program Participants. This part describes the requirements and policies governing how the PHA and the owner will select a family to receive PBV assistance.

Part VII: Occupancy. This part discusses occupancy requirements related to the lease, and describes under what conditions families are allowed or required to move. In addition, exceptions to the occupancy cap (which limits PBV assistance to 25 percent of the units in any project) are also discussed.

Part VIII: Determining Rent to Owner. This part describes how the initial rent to owner is determined, and how rent will be redetermined throughout the life of the HAP contract. Rent reasonableness requirements are also discussed.

Part IX: Payments to Owner. This part describes the types of payments owners may receive under this program.

PART I: GENERAL REQUIREMENTS

17-I.A. OVERVIEW [24 CFR 983.5]

The project-based voucher (PBV) program allows PHAs that already administer a tenant-based voucher program under an annual contributions contract (ACC) with HUD to take up to 20 percent of its voucher program budget authority and attach the funding to specific units rather than using it for tenant-based assistance [24 CFR 983.6]. PHAs may operate a PBV program if doing so is consistent with the PHA's Annual Plan, and the goal of de-concentrating poverty and expanding housing and economic opportunities [42 U.S.C. 1437f(o)(13)].

PHA Policy

The PHA will operate a project-based voucher program using up to the HUD allowed limit of its budget authority, currently 20 percent, for project-based assistance.

PBV assistance may be attached to existing housing or newly constructed or rehabilitated housing [24 CFR 983.52]. If PBV units are already selected for project-based assistance either under an agreement to enter into HAP Contract (Agreement) or a HAP contract, the PHA is not required to reduce the number of these units if the amount of budget authority is subsequently reduced. However, the PHA is responsible for determining the amount of budget authority that is available for project-based vouchers and ensuring that the amount of assistance that is attached to units is within the amounts available under the ACC [24 CFR 983.6].

17-I.B. TENANT-BASED VS. PROJECT-BASED VOUCHER ASSISTANCE [24 CFR 983.2]

Much of the tenant-based voucher program regulations also apply to the PBV program. Consequently, many of the PHA policies related to tenant-based assistance also apply to PBV assistance. The provisions of the tenant-based voucher regulations that do not apply to the PBV program are listed at 24 CFR 983.2.

PHA Policy

Except as otherwise noted in this chapter, or unless specifically prohibited by PBV program regulations, the PHA policies for the tenant-based voucher program contained in this administrative plan also apply to the PBV program and its participants.

17-I.C. RELOCATION REQUIREMENTS [24 CFR 983.7]

Any persons displaced as a result of implementation of the PBV program must be provided relocation assistance in accordance with the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA)[42 U.S.C. 4201-4655] and implementing regulations at 49 CFR part 24.

The cost of required relocation assistance may be paid with funds provided by the owner, local public funds, or funds available from other sources. PHAs may not use voucher program funds to cover relocation costs, except that PHAs may use their administrative fee reserve to pay for relocation expenses after all other program administrative expenses are satisfied, and provided that payment of the relocation benefits is consistent with state and local law. Use of the administrative fee for these purposes must also be consistent with other legal and regulatory requirements, including the requirement in 24 CFR 982.155 and other official HUD issuances.

The acquisition of real property for a PBV project is subject to the URA and 49 CFR part 24, subpart B. It is the responsibility of the PHA to ensure the owner complies with these requirements.

17-I.D. EQUAL OPPORTUNITY REQUIREMENTS [24 CFR 983.8]

The PHA must comply with all equal opportunity requirements under federal law and regulations in its implementation of the PBV program. This includes the requirements and authorities cited at 24 CFR 5.105(a). In addition, the PHA must comply with the PHA Plan certification on civil rights and affirmatively furthering fair housing, submitted in accordance with 24 CFR 903.7(o).

PART II: PBV OWNER PROPOSALS

17-II.A. OVERVIEW

The PHA must describe the procedures for owner submission of PBV proposals and for PHA selection of PBV proposals [24 CFR 983.51]. Before selecting a PBV proposal, the PHA must determine that the PBV proposal complies with HUD program regulations and requirements, including a determination that the property is eligible housing [24 CFR 983.53 and 983.54], complies with the cap on the number of PBV units per project [24 CFR 983.56, FR Notice 11/24/08], and meets the site selection standards [24 CFR 983.57]. The PHA may not commit PBVs until or unless it has followed the proposal selection requirements defined in 24 CFR 983.51 [Notice PIH 2011-54].

17-II.B. OWNER PROPOSAL SELECTION PROCEDURES [24 CFR 983.51(b)]

The PHA must select PBV proposals in accordance with the selection procedures in the PHA administrative plan. The PHA must select PBV proposals by either of the following two methods.

- PHA request for PBV Proposals (Competitive). The PHA may solicit proposals by using a request for proposals to select proposals on a competitive basis in response to the PHA request. The PHA may not limit proposals to a single site or impose restrictions that explicitly or practically preclude owner submission of proposals for PBV housing on different sites.
- The PHA may select proposal that were previously selected based on a competition (Non-Competitive). This may include selection of a proposal for housing assisted under a federal, state, or local government housing assistance program that was subject to a competition in accordance with the requirements of the applicable program, community development program, or supportive services program that requires competitive selection of proposals (e.g., HOME, and units for which competitively awarded LIHTCs have been provided), where the proposal has been selected in accordance with such program's competitive selection requirements within three years of the PBV proposal selection date, and the earlier competitive selection proposal did not involve any consideration that the project would receive PBV assistance. In these cases, assistance can be awarded non-competitively and posted for Public Notification.

Solicitation and Selection of PBV Proposals [24 CFR 983.51(c)]

PHA procedures for selecting PBV proposals must be designed and actually operated to provide broad public notice of the opportunity to offer PBV proposals for consideration by the PHA. The PHA will choose a method of solicitation which, considering matters of economy, provides for full and open competition. The PHA may publish its advertisement in newspapers or other print mediums of local or general circulation for a period sufficient to achieve effective competition, which, in the case of paid advertisements, should generally be run not less than once each week for two consecutive weeks. The public notice procedures may alternatively include other means designed and actually operated to provide broad public notice through the internet or by direct mail. In addition, the PHA will post the RFP and/or proposal submission and rating and ranking procedures on its electronic web site. The public notice of the PHA request for PBV proposals must specify the submission deadline. Detailed application and selection information must be provided at the request of interested parties.

PHA Policy

(1) PHA Request for Proposals for Rehabilitated and Newly Constructed Units

The PHA will advertise its request for proposals (RFP) for rehabilitated and newly constructed housing as described above.

The solicitation will specify the number of units the PHA estimates that it will be able to assist under the funding the PHA is making available. Proposals will be due in the PHA office by close of business 30 calendar days from the date of the last publication.

In order for the proposal to be considered, the owner must submit the proposal to the PHA by the published deadline date, and the proposal must respond to all requirements as outlined in the RFP. Incomplete proposals will not be reviewed.

The PHA will rate and rank proposals for rehabilitated and newly constructed housing using the following criteria:

TERM OF CONTRACT REQUESTED (MIN. 5 PTS. REQUIRED)	MAX. PTS. AVAIL.
Fifteen years	20
Eight to eleven years	10
Five to seven years	5
DEVELOPMENT EXPERIENCE (MIN. 5 PTS. REQUIRED)	MAX. PTS. AVAIL.
If applicant has developed 100 or more low-income housing units as primary or co-sponsor in the past five years.	10
If applicant has developed between 50 and 100 low-income housing units as primary or co-sponsor in the past five years.	5
OWNER EXPERIENCE (MIN. 1 PT. REQUIRED)	MAX. PTS. AVAIL.
If applicant has 20 or more years of experience in owning affordable rental housing.	5
If applicant has 10 to 19 years of experience in owning affordable rental housing.	2
If applicant has 20 or more years of experience in owning other types of rental housing.	2
If applicant has 10 to 19 years of experience in owning other types of rental housing.	1
BUILDING EXPERIENCE (MIN. 1 PT. REQUIRED)	MAX. PTS. AVAIL.

If applicant has 20 or more years of experience in building and maintaining affordable rental housing.	5
If applicant has 10 to 19 years of experience in building and maintaining affordable rental housing.	2
If applicant has 20 or more years of experience in building and maintaining other types of rental housing.	2
If applicant has 10 to 19 years of experience in building and maintaining other types of rental housing.	1
DECONCENTRATION OF POVERTY (MIN. 5 PTS. REQUIRED)	MAX. PTS. AVAIL.
Project in a census tract that has a poverty concentration of 20 percent or less	20
<p>PHA will grant exceptions to the 20 percent standard where the PHA determines that the PBV assistance will complement other local redevelopment activities designed to de-concentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations greater than 20 percent, such as sites in (select one):</p> <ul style="list-style-type: none"> ○ A census tract in which the proposed PBV development will be located in a HUD-designated Enterprise Zone, Economic Community, or Renewal Community; ○ A census tract where the concentration of assisted units will be or has decreased as a result of public housing demolition and HOPE VI redevelopment; ○ A census tract in which the proposed PBV development will be located is undergoing significant revitalization as a result of state, local, or federal dollars invested in the area; ○ A census tract where new market rate units are being developed where such market rate units will positively impact the poverty rate in the area; ○ A census tract where there has been an overall decline in the poverty rate within the past five years; or ○ A census tract where there are meaningful opportunities for educational and economic advancement. 	20
SERVICES (MIN. 5 PTS. REQUIRED)	MAX. PTS. AVAIL.
Extent to which services for special populations are provided on site or in the immediate area for occupants of the property; services may include the following: Child care, Transportation, Education, Job Training and/or Employment Counseling, Substance/Alcohol Abuse Treatment or Counseling, Household Skill Trainings (housekeeping & homemaking), Homeownership Counseling, Family Budgeting, and/or Parenting Skills	
Three or more services	20
Two services	10
One service	5
UNITS ASSISTED (MIN. 5 PTS. REQUIRED)	MAX. PTS. AVAIL.
Projects with less than 25 percent of the units assisted will be rated higher than projects with 25 percent of the units assisted. In the case of projects for occupancy by the elderly, persons with disabilities or families needing other services, the PHA will rate partially assisted projects on the percent of units assisted. Projects with the lowest percent of assisted units will receive the highest score.	

Less than 5 percent of the units assisted	20
6 percent to 14 percent of the units assisted	15
15 percent to 24 percent of units assisted	10
25 percent of units assisted	5

(2) PHA Requests for Proposals for Existing Housing Units

The PHA will advertise its request for proposals (RFP) for existing housing as described above. The solicitation will specify the number of units the PHA estimates that it will be able to assist under the funding the PHA is making available. Owner proposals will be accepted on a first-come first-served basis and will be evaluated using the following criteria:

TERM OF CONTRACT REQUESTED (MIN. 5 PTS. REQUIRED)	MAX. PTS. AVAIL.
Fifteen years	20
Eight to eleven years	10
Five to seven years	5
COMMUNITY AMENITIES (MIN. 10 PTS. REQUIRED)	MAX. PTS. AVAIL.
If not a project for the elderly or disabled, site is within two miles of places of significant employment, offering a range of jobs for lower income workers, and a significant health facility.	20
Same as above but distance is more than two miles but less than five miles	10
If a project for the elderly or disabled, site is within 1/4 mile of shopping, significant health facility and neighborhood services, or is within 1/4 mile of bus to these services.	20
Same as above but distance is more than two miles but less than two miles	10
PROJECT SERVICES (MIN. 5 PTS. REQUIRED)	MAX. PTS. AVAIL.
Extent to which services for special populations are provided on site or in the immediate area for occupants of the property; services may include the following: Child care, Transportation, Education, Job Training and/or Employment Counseling, Substance/Alcohol Abuse Treatment or Counseling, Household Skill Trainings (housekeeping & homemaking), Homeownership Counseling, Family Budgeting, and/or Parenting Skills	
Three or more services	20
Two services	10
One service	5
PREVIOUS EXPERIENCE (MIN. 5 PTS. REQUIRED)	MAX. PTS. AVAIL.
20 years or more experience managing and maintaining affordable rental housing	20
10 to 19 years of experience managing and maintaining affordable rental housing	10
20 years or more years of experience managing and maintaining rental housing	10
10 to 19 years of experience managing and maintaining rental housing	5
DECONCENTRATION OF POVERTY (MIN. 5 PTS. REQUIRED)	MAX. PTS. AVAIL.
Project in a census tract that has a poverty concentration of 20 percent or less	20
PHA will grant exceptions to the 20 percent standard where the PHA determines that the PBV assistance will complement other local redevelopment activities designed to de-concentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations greater than 20 percent, such as sites in (select one): <ul style="list-style-type: none"> o A census tract in which the proposed PBV development will be located in a HUD-designated Enterprise Zone, Economic Community, or 	20

<p>Renewal Community;</p> <ul style="list-style-type: none">○ A census tract where the concentration of assisted units will be or has decreased as a result of public housing demolition and HOPE VI redevelopment;○ A census tract in which the proposed PBV development will be located is undergoing significant revitalization as a result of state, local, or federal dollars invested in the area;○ A census tract where new market rate units are being developed where such market rate units will positively impact the poverty rate in the area;○ A census tract where there has been an overall decline in the poverty rate within the past five years; or○ A census tract where there are meaningful opportunities for educational and economic advancement.	
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(3) PHA Selection of Proposals Subject to a Previous Competition under a Federal, State, or Local Housing Assistance Program

The PHA will accept proposals for PBV assistance from owners that were competitively selected under another federal, state, or local government housing assistance, including projects that were competitively awarded Low-Income Housing Tax Credits, community development, or supportive services program(s) where the proposal has been selected in accordance with such program's competitive selection requirements within three years of the PBV proposal selection date, and the earlier competitive selection proposal did not involve any consideration that the project would receive PBV assistance. In these cases, assistance can be awarded non-competitively and posted for Public Notification.

Non-Competitive proposals can be presented to the SFHA at anytime. Owners are not required to wait until an Invitation for Proposals is published to present a proposal for consideration under the guidelines of non-competitive selection. However, the SFHA must publish the award of any units under the PBV Program in a newspaper of general circulation. Every effort will be made to publish the results of any awards under the PBV Program within 30 days of the award date.

The PHA may periodically advertise that it is accepting proposals as described above.

In addition to, or in place of advertising, the PHA may also directly contact specific owners that have already been selected for Federal, state, or local housing assistance based on a previously held competition, to inform them of available PBV assistance.

Proposals will be reviewed on a first-come first-served basis. The PHA will evaluate each proposal on its merits using the following factors:

TERM OF CONTRACT REQUESTED (MIN. 5 PTS. REQUIRED)	MAX. PTS. AVAIL.
Fifteen years	20
Eight to eleven years	10
Five to seven years	5
LOCAL ACTIVITIES (MIN. 10 PTS. REQUIRED)	MAX. PTS. AVAIL.
Extent to which the proposal complements other local activities such as the redevelopment of a public housing site under the HOPE VI program, HOPE SF, Choice Neighborhoods Initiative, the HOME program, CDBG activities, other development activities in a HUD-designated Enterprise Zone, Economic Community, or Renewal Community.	
If the proposed site meets the above criteria	20
If the proposed site meets other development activities (please specify)	10
DECONCENTRATION OF POVERTY (MIN. 5 PTS. REQUIRED)	MAX. PTS. AVAIL.
Project in a census tract that has a poverty concentration of 20 percent or less	20
PHA will grant exceptions to the 20 percent standard where the PHA determines that the PBV assistance will complement other local redevelopment activities designed to de-concentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations greater than 20 percent, such as sites in (select one):	20
o A census tract in which the proposed PBV	

<p>development will be located in a HUD-designated Enterprise Zone, Economic Community, or Renewal Community;</p> <ul style="list-style-type: none"> ○ A census tract where the concentration of assisted units will be or has decreased as a result of public housing demolition and HOPE VI redevelopment; ○ A census tract in which the proposed PBV development will be located is undergoing significant revitalization as a result of state, local, or federal dollars invested in the area; ○ A census tract where new market rate units are being developed where such market rate units will positively impact the poverty rate in the area; ○ A census tract where there has been an overall decline in the poverty rate within the past five years; or ○ A census tract where there are meaningful opportunities for educational and economic advancement. 	
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(4) MANDATORY Selection Criteria for PBV HUD VASH Voucher Proposals (in additional to above criteria):

AN EXPLANATION AS TO WHY THE PROJECT IS PROPOSING TO PROJECT-BASE HUD-VASH VOUCHERS RATHER THAN PROVIDING TENANT-BASED ASSISTANCE. (MIN. 10 PTS. REQUIRED)	10 MAX. PTS. AVAIL.
A DESCRIPTION OF CHALLENGES VOUCHER HOLDERS (AND HUD-VASH VOUCHER HOLDERS, IN PARTICULAR) FACE IN THE LOCAL RENTAL MARKET. INCLUDE THE COMMUNITY NEEDS, CITY'S HOUSING GOALS, AND SUCCESS RATE OF HUD-VASH VOUCHERS IN THE COMMUNITY. (MIN. 10 PTS. REQUIRED)	10 MAX. PTS. AVAIL.
FOR NEWLY CONSTRUCTED/SUBSTANTIALLY REHABILITATED UNITS, THE LENGTH OF TIME HUD-VASH VOUCHERS WOULD BE NOT UTILIZED WHILE WAITING FOR THE PBV UNITS TO BE COMPLETED. (MIN. 5 PTS. REQUIRED)	10 MAX. PTS. AVAIL.
If property utilizes vouchers within 0 – 12 months of selection	10
If property utilizes vouchers after 12 months of selection	5
A DESCRIPTION OF THE PROPOSED PROJECT INCLUDING THE FOLLOWING DATA:	50 MAX. PTS. AVAIL.
Total number of proposed PBV units and buildings in the project	5
Poverty rate of the census tract in which the site is located	5
PHA Plan and Administrative Plan policies on deconcentrating poverty and expanding housing and economic opportunities, if applicable to the census tract's poverty rate (see 24 CFR Section 983.57(b)(1))	10 MAX. PTS.
YES	10

NO	5
Any HUD-VASH related supportive services on or near the premises of the proposed site	10 MAX. PTS.
YES	10
NO	5
Accessibility of the proposed site to the VAMC or CBOC, transportation, and social and medical services.	20 MAX. PTS.
If property is located within three miles of a VA facility	10
If the property is located with one mile of shopping or neighborhood services	5
If the property is located within three miles of places of significant employment	5
A LETTER OF SUPPORT SIGNED BY VETERAN'S AFFAIRS MEDICAL CENTER (VAMC) OR VETERANS INTEGRATED SERVICE (VISN) DIRECTOR <u>AND</u> THE VA NETWORK HOMELESS COORDINATOR. (MIN. 20 PTS. REQUIRED)	20 MAX.PTS.

PHA-owned Units [24 CFR 983.51(e) and 983.59]

A PHA-owned unit may be assisted under the PBV program only if the HUD field office or HUD-approved independent entity reviews the selection process and determines that the PHA-owned units were appropriately selected based on the selection procedures specified in the PHA administrative plan. If the PHA selects a proposal for housing that is owned or controlled by the PHA, the PHA must identify the entity that will review the PHA proposal selection process and perform specific functions with respect to rent determinations and inspections.

In the case of PHA-owned units, the initial contract rent must be approved by an independent entity based on an appraisal by a licensed, state-certified appraiser. In addition, housing quality standards inspections must be conducted by an independent entity.

The independent entity that performs these program services may be the unit of general local government for the PHA jurisdiction (unless the PHA is itself the unit of general local government or an agency of such government) or another HUD-approved public or private independent entity.

PHA Policy

The SFHA will use an independent entity approved by HUD, to perform required rent determinations and housing quality standards inspections in PBV program units where the SFHA has an identity of interest in the property.

A state-certified appraiser's market rent study used to determine initial contract rents for PBV program units may be based on a geographical area covering multiple sites located within that geographical area. The PHA may only compensate the independent entity and appraiser from PHA ongoing administrative fee income (including amounts credited to the administrative fee reserve). The PHA may not use other program receipts to compensate the independent entity and appraiser for their services. The PHA, independent entity, and appraiser may not charge the family any fee for the appraisal or the services provided by the independent entity.

PHA Notice of Owner Selection [24 CFR 983.51(d)]

The PHA must give prompt written notice to the party that submitted a selected proposal and must also give prompt public notice of such selection. Public notice procedures may include publication of public notice in a local newspaper of general circulation and other means designed and actually operated to provide broad public notice.

PHA Policy

Within 10 business days of the PHA making the selection, the PHA will notify the selected owner in writing of the owner's selection for the PBV program. The PHA will also notify in writing all owners that submitted proposals that were not selected and advise such owners of the name of the selected owner.

In addition, the PHA will publish its notice for selection of PBV proposals for two consecutive days in the same newspapers and trade journals the PHA used to solicit the proposals. The announcement will include the name of the owner that was selected for the PBV program. The PHA will also post the notice of owner selection on its electronic web site.

The PHA will make available to any interested party its rating and ranking sheets and documents that identify the PHA basis for selecting the proposal. These documents will be available for review by the public and other interested parties for one month after publication of the notice of owner selection. The PHA will not make available sensitive owner information that is privileged, such as financial statements and similar information about the owner.

The PHA will make these documents available for review at the PHA during normal business hours. The cost for reproduction of allowable documents will be \$.25 per page.

17-II.C. HOUSING TYPE [24 CFR 983.52]

The PHA may attach PBV assistance for units in existing housing or for newly constructed or rehabilitated housing developed under and in accordance with an agreement to enter into a housing assistance payments contract that was executed prior to the start of construction. A housing unit is considered an existing unit for purposes of the PBV program, if, at the time of notice of PHA selection, the units substantially comply with HQS. Units for which new construction or rehabilitation was started in accordance with PBV program requirements do not qualify as existing housing.

The PHA must decide what housing type, new construction, rehabilitation, or existing housing, will be used to develop project-based housing. The PHA choice of housing type must be reflected in its solicitation for proposals.

17-II.D. PROHIBITION OF ASSISTANCE FOR CERTAIN UNITS

Ineligible Housing Types [24 CFR 983.53]

The PHA may not attach or pay PBV assistance to shared housing units; units on the grounds of a penal reformatory, medical, mental, or similar public or private institution; nursing homes or facilities providing continuous psychiatric, medical, nursing services, board and care, or intermediate care (except that assistance may be provided in assisted living facilities); units that are owned or controlled by an educational institution or its affiliate and are designated for occupancy by students; manufactured homes; and transitional housing. In addition, the PHA may not attach or pay PBV assistance for a unit occupied by an owner and the PHA may not select or enter into an agreement to enter into a HAP contract or HAP contract for a unit occupied by a family ineligible for participation in the PBV program.

Subsidized Housing [24 CFR 983.54]

A PHA may not attach or pay PBV assistance to units in any of the following types of subsidized housing:

- A public housing unit;
- A unit subsidized with any other form of Section 8 assistance;
- A unit subsidized with any governmental rent subsidy;
- A unit subsidized with any governmental subsidy that covers all or any part of the operating costs of the housing;
- A unit subsidized with Section 236 rental assistance payments (except that a PHA may attach assistance to a unit subsidized with Section 236 interest reduction payments);
- A Section 202 project for non-elderly with disabilities;
- Section 811 project-based supportive housing for persons with disabilities;
- Section 202 supportive housing for the elderly;
- A Section 101 rent supplement project;
- A unit subsidized with any form of tenant-based rental assistance;
- A unit with any other duplicative federal, state, or local housing subsidy, as determined by HUD or the PHA in accordance with HUD requirements.

17-II.E. SUBSIDY LAYERING REQUIREMENTS [24 CFR 983.55, FR Notice 11/24/08, and FR Notice 7/9/10]

The PHA may provide PBV assistance only in accordance with HUD subsidy layering regulations [24 CFR 4.13] and other requirements.

The subsidy layering review is intended to prevent excessive public assistance by combining (layering) housing assistance payment subsidy under the PBV program with other governmental housing assistance from federal, state, or local agencies, including assistance such as tax concessions or tax credits.

The PHA must submit the necessary documentation to HUD for a subsidy layering review. Except in cases of HAP contracts for existing structures, or if such reviews have been conducted by the applicable state and local agencies (defined by HUD as qualified housing credit agencies, or HCAs), the PHA may not enter into an agreement to enter into a HAP contract or a HAP contract until HUD, or an independent entity approved by HUD, has conducted any required subsidy layering review and determined that the PBV assistance is in accordance with HUD subsidy layering requirements. However, in order to satisfy applicable requirements, HCAs must conduct subsidy layering reviews in compliance with the guidelines set forth in the *Federal Register* notice published July 9, 2010.

The HAP contract must contain the owner's certification that the project has not received and will not receive (before or during the term of the HAP contract) any public assistance for acquisition, development, or operation of the housing other than assistance disclosed in the subsidy layering review in accordance with HUD requirements.

17-II.F. CAP ON NUMBER OF PBV UNITS IN EACH PROJECT**25 Percent per Project Cap [24 CFR 983.56(a), FR Notice 11/24/08]**

In general, the PHA may not select a proposal to provide PBV assistance for units in a project or enter into an agreement to enter into a HAP or a HAP contract to provide PBV assistance for units in a project, if the total number of dwelling units in the project that will receive PBV assistance during the term of the PBV HAP contract is more than 25 percent of the number of dwelling units (assisted or unassisted) in the project.

Exceptions to 25 Percent per Project Cap [24 CFR 983.56(b), FR Notice 11/24/08]

Exceptions are allowed and PBV units are not counted against the 25 percent per project cap if:

- The units are in a single-family building (one to four units);
- The units are *excepted units* in a multifamily building because they are specifically made available for elderly or disabled families or families receiving supportive services (also known as *qualifying families*).

PHAs must include in the PHA administrative plan the type of services offered to families for a project to qualify for the exception and the extent to which such services will be provided. It is not necessary that the services be provided at or by the project, if they are approved services. To qualify, a family must have at least one member receiving at least one qualifying supportive service. A PHA may not require participation in medical or disability-related services other than drug and alcohol treatment in the case of current abusers as a condition of living in an excepted unit, although such services may be offered.

If a family at the time of initial tenancy is receiving, and while the resident of an excepted unit has received, FSS supportive services or any other supportive services as defined in the PHA administrative plan, and successfully completes the FSS contract of participation or the supportive services requirement, the unit continues to count as an excepted unit for as long as the family resides in the unit.

The PHA must monitor the excepted family's continued receipt of supportive services and take appropriate action regarding those families that fail without good cause to complete their supportive services requirement. The PHA administrative plan must state the form and frequency of such monitoring.

PHA Policy

The PHA may provide PBV assistance for excepted units.

To be eligible for this service exception a project must provide, to the excepted units one or more for the following services:

- Child care;
- Transportation;
- Education;
- Job Training and/or Employment Counseling;
- Substance/Alcohol Abuse Treatment or Counseling;
- Household Skill Trainings (housekeeping & homemaking);
- Homeownership Counseling;
- Family Budgeting;
- Parenting Skills;

The Project Owner will be responsible for regularly monitoring the supportive services requirements for the excepted units and must submit, at least annually, a report listing the families, the types of services provided and accessed, and the frequency of the that access

Promoting Partially-Assisted Buildings [24 CFR 983.56(c)]

A PHA may establish local requirements designed to promote PBV assistance in partially assisted buildings. A *partially assisted building* is a building in which there are fewer units covered by a HAP contract than residential units [24 CFR 983.3].

A PHA may establish a per-building cap on the number of units that will receive PBV assistance or other project-based assistance in a multifamily building containing excepted units or in a single-family building. A PHA may also determine not to provide PBV assistance for excepted units, or the PHA may establish a per-building cap of less than 25 percent.

PHA Policy:

The PHA will provide assistance for excepted units. Beyond that, the PHA will not impose any further cap on the number of PBV units assisted per building.

17-II.G. SITE SELECTION STANDARDS

Compliance with PBV Goals, Civil Rights Requirements, and HQS Site Standards [24 CFR 983.57(b)]

The PHA may not select a proposal for existing, newly constructed, or rehabilitated PBV housing on a site or enter into an agreement to enter into a HAP contract or HAP contract for units on the site, unless the PHA has determined that PBV assistance for housing at the selected site is consistent with the goal of de-concentrating poverty and expanding housing and economic opportunities. The standard for de-concentrating poverty and expanding housing and economic opportunities must be consistent with the PHA Plan under 24 CFR 903 and the PHA administrative plan.

In addition, prior to selecting a proposal, the PHA must determine that the site is suitable from the standpoint of facilitating and furthering full compliance with the applicable Civil Rights Laws, regulations, and Executive Orders, and that the site meets the HQS site and neighborhood standards at 24 CFR 982.401(l).

PHA Policy

It is the PHA goal to select sites for PBV housing that provide for de-concentrating poverty and expanding housing and economic opportunities. In complying with this goal the PHA will limit approval of sites for PBV housing in census tracts that have poverty concentrations of 20 percent or less.

However, the PHA will grant exceptions to the 20 percent standard where the PHA determines that the PBV assistance will complement other local redevelopment activities designed to de-concentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations greater than 20 percent, such as sites in:

A census tract in which the proposed PBV development will be located in a HUD-designated Enterprise Zone, Economic Community, or Renewal Community;

A census tract where the concentration of assisted units will be or has decreased as a result of public housing demolition and HOPE VI redevelopment;

A census tract in which the proposed PBV development will be located is undergoing significant revitalization as a result of state, local, or federal dollars invested in the area;

A census tract where new market rate units are being developed where such market rate units will positively impact the poverty rate in the area;

A census tract where there has been an overall decline in the poverty rate within the past five years; or

A census tract where there are meaningful opportunities for educational and economic advancement.

Existing and Rehabilitated Housing Site and Neighborhood Standards [24 CFR 983.57(d)]

The PHA may not enter into an agreement to enter into a HAP contract nor enter into a HAP contract for existing or rehabilitated housing until it has determined that the site complies with the HUD required site and neighborhood standards. The site must:

- Be adequate in size, exposure, and contour to accommodate the number and type of units proposed;
- Have adequate utilities and streets available to service the site;
- Promote a greater choice of housing opportunities and avoid undue concentration of assisted persons in areas containing a high proportion of low-income persons;
- Be accessible to social, recreational, educational, commercial, and health facilities and services and other municipal facilities and services equivalent to those found in neighborhoods consisting largely of unassisted similar units; and
- Be located so that travel time and cost via public transportation or private automobile from the neighborhood to places of employment is not excessive.

New Construction Site and Neighborhood Standards [24 CFR 983.57(e)]

In order to be selected for PBV assistance, a site for newly constructed housing must meet the following HUD required site and neighborhood standards:

- The site must be adequate in size, exposure, and contour to accommodate the number and type of units proposed;
- The site must have adequate utilities and streets available to service the site;
- The site must not be located in an area of minority concentration unless the PHA determines that sufficient, comparable opportunities exist for housing for minority families in the income range to be served by the proposed project outside areas of minority concentration or that the project is necessary to meet overriding housing needs that cannot be met in that housing market area;
- The site must not be located in a racially mixed area if the project will cause a significant increase in the proportion of minority to non-minority residents in the area.
- The site must promote a greater choice of housing opportunities and avoid undue concentration of assisted persons in areas containing a high proportion of low-income persons;
- The neighborhood must not be one that is seriously detrimental to family life or in which substandard dwellings or other undesirable conditions predominate;
- The housing must be accessible to social, recreational, educational, commercial, and health facilities and services and other municipal facilities and services equivalent to those found in neighborhoods consisting largely of unassisted similar units; and

- Except for housing designed for elderly persons, the housing must be located so that travel time and cost via public transportation or private automobile from the neighborhood to places of employment is not excessive.

17-II.H. ENVIRONMENTAL REVIEW [24 CFR 983.58]

The PHA activities under the PBV program are subject to HUD environmental regulations in 24 CFR parts 50 and 58. The *responsible entity* is responsible for performing the federal environmental review under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.). The PHA may not enter into an agreement to enter into a HAP contract nor enter into a HAP contract until it has complied with the environmental review requirements.

In the case of existing housing, the responsible entity that is responsible for the environmental review under 24 CFR part 58 must determine whether or not PBV assistance is categorically excluded from review under the National Environmental Policy Act and whether or not the assistance is subject to review under the laws and authorities listed in 24 CFR 58.5.

The PHA may not enter into an agreement to enter into a HAP contract or a HAP contract with an owner, and the PHA, the owner, and its contractors may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct real property or commit or expend program or local funds for PBV activities under this part, until the environmental review is completed.

The PHA must supply all available, relevant information necessary for the responsible entity to perform any required environmental review for any site. The PHA must require the owner to carry out mitigating measures required by the responsible entity (or HUD, if applicable) as a result of the environmental review.

PART III: DWELLING UNITS

17-III.A. OVERVIEW

This part identifies the special housing quality standards that apply to the PBV program, housing accessibility for persons with disabilities, and special procedures for conducting housing quality standards inspections.

17-III.B. HOUSING QUALITY STANDARDS [24 CFR 983.101]

The housing quality standards (HQS) for the tenant-based program, including those for special housing types, generally apply to the PBV program. HQS requirements for shared housing, manufactured home space rental, and the homeownership option do not apply because these housing types are not assisted under the PBV program.

The physical condition standards at 24 CFR 5.703 do not apply to the PBV program.

Lead-based Paint [24 CFR 983.101(c)]

The lead-based paint requirements for the tenant-based voucher program do not apply to the PBV program. Instead, The Lead-based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations at 24 CFR part 35, subparts A, B, H, and R, apply to the PBV program.

17-III.C. HOUSING ACCESSIBILITY FOR PERSONS WITH DISABILITIES

The housing must comply with program accessibility requirements of section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and implementing regulations at 24 CFR part 8. The PHA must ensure that the percentage of accessible dwelling units complies with the requirements of section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as implemented by HUD's regulations at 24 CFR 8, subpart C.

Housing first occupied after March 13, 1991, must comply with design and construction requirements of the Fair Housing Amendments Act of 1988 and implementing regulations at 24 CFR 100.205, as applicable. (24 CFR 983.102)

17-III.D. INSPECTING UNITS

Pre-selection Inspection [24 CFR 983.103(a)]

The PHA must examine the proposed site before the proposal selection date. If the units to be assisted already exist, the PHA must inspect all the units before the proposal selection date, and must determine whether the units substantially comply with HQS. To qualify as existing housing, units must substantially comply with HQS on the proposal selection date. However, the PHA may not execute the HAP contract until the units fully comply with HQS.

Pre-HAP Contract Inspections [24 CFR 983.103(b)]

The PHA must inspect each contract unit before execution of the HAP contract. The PHA may not enter into a HAP contract covering a unit until the unit fully complies with HQS.

Turnover Inspections [24 CFR 983.103(c)]

Before providing assistance to a new family in a contract unit, the PHA must inspect the unit. The PHA may not provide assistance on behalf of the family until the unit fully complies with HQS.

Annual Inspections [24 CFR 983.103(d)]

At least annually during the term of the HAP contract, the PHA must inspect a random sample, consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS. Turnover inspections are not counted toward meeting this annual inspection requirement.

If more than 20 percent of the annual sample of inspected contract units in a building fails the initial inspection, the PHA must re-inspect 100 percent of the contract units in the building.

Other Inspections [24 CFR 983.103(e)]

The PHA must inspect contract units whenever needed to determine that the contract units comply with HQS and that the owner is providing maintenance, utilities, and other services in accordance with the HAP contract. The PHA must take into account complaints and any other information coming to its attention in scheduling inspections.

The PHA must conduct follow-up inspections needed to determine if the owner (or, if applicable, the family) has corrected an HQS violation, and must conduct inspections to determine the basis for exercise of contractual and other remedies for owner or family violation of HQS.

In conducting PHA supervisory quality control HQS inspections, the PHA should include a representative sample of both tenant-based and project-based units.

Inspecting PHA-owned Units [24 CFR 983.103(f)]

In the case of PHA-owned units, the inspections must be performed by an independent agency designated by the PHA and approved by HUD. The independent entity must furnish a copy of each inspection report to the PHA and to the HUD field office where the project is located. The PHA must take all necessary actions in response to inspection reports from the independent agency, including exercise of contractual remedies for violation of the HAP contract by the PHA-owner.

PART IV: REHABILITATED AND NEWLY CONSTRUCTED UNITS

17-IV.A. OVERVIEW [24 CFR 983.151]

There are specific requirements that apply to PBV assistance for newly constructed or rehabilitated housing that do not apply to PBV assistance in existing housing. This part describes the requirements unique to this type of assistance.

Housing selected for this type of assistance may not at a later date be selected for PBV assistance as existing housing.

17-IV.B. AGREEMENT TO ENTER INTO HAP CONTRACT

In order to offer PBV assistance in rehabilitated or newly constructed units, the PHA must enter into an agreement to enter into HAP contract (Agreement) with the owner of the property. The Agreement must be in the form required by HUD [24 CFR 983.152(a)].

In the Agreement the owner agrees to develop the PBV contract units to comply with HQS, and the PHA agrees that upon timely completion of such development in accordance with the terms of the Agreement, the PHA will enter into a HAP contract with the owner for the contract units [24 CFR 983.152(b)].

Content of the Agreement [24 CFR 983.152(c)]

At a minimum, the Agreement must describe the following features of the housing to be developed and assisted under the PBV program:

- Site and the location of the contract units;
- Number of contract units by area (size) and number of bedrooms and bathrooms;
- Services, maintenance, or equipment to be supplied by the owner without charges in addition to the rent;
- Utilities available to the contract units, including a specification of utility services to be paid by the owner and utility services to be paid by the tenant;
- An indication of whether or not the design and construction requirements of the Fair Housing Act and section 504 of the Rehabilitation Act of 1973 apply to units under the Agreement. If applicable, any required work item resulting from these requirements must be included in the description of work to be performed under the Agreement;
- Estimated initial rents to owner for the contract units;
- Description of the work to be performed under the Agreement. For rehabilitated units, the description must include the rehabilitation work write up and, where determined necessary by the PHA, specifications and plans. For new construction units, the description must include the working drawings and specifications.
- Any additional requirements for quality, architecture, or design over and above HQS.

Execution of the Agreement [24 CFR 983.153, FR Notice 11/24/08]

The Agreement must be executed promptly after PHA notice of proposal selection to the selected owner. Generally, the PHA may not enter into the Agreement with the owner until the subsidy layering review is completed. Likewise, the PHA may not enter into the Agreement until the environmental review is completed and the PHA has received environmental approval. However, the PHA does not need to conduct a subsidy layering review in the case of a HAP contract for an existing structure or if the applicable state or local agency has conducted such a review. Similarly, environmental reviews are not required for existing structures unless otherwise required by law or regulation.

PHA Policy

The PHA will enter into the Agreement with the owner within 10 business days of receiving both environmental approval and notice that subsidy layering requirements have been met, and before construction or rehabilitation work is started.

17-IV.C. CONDUCT OF DEVELOPMENT WORK

Labor Standards [24 CFR 983.154(b)]

If an Agreement covers the development of nine or more contract units (whether or not completed in stages), the owner and the owner's contractors and subcontractors must pay Davis-Bacon wages to laborers and mechanics employed in the development of housing. The HUD-prescribed form of the Agreement will include the labor standards clauses required by HUD, such as those involving Davis-Bacon wage rates.

The owner, contractors, and subcontractors must also comply with the Contract Work Hours and Safety Standards Act, Department of Labor regulations in 29 CFR part 5, and other applicable federal labor relations laws and regulations. The PHA must monitor compliance with labor standards.

Equal Opportunity [24 CFR 983.154(c)]

The owner must comply with Section 3 of the Housing and Urban Development Act of 1968 and the implementing regulations at 24 CFR part 135. The owner must also comply with federal equal employment opportunity requirements.

Owner Disclosure [24 CFR 983.154(d) and (e)]

The Agreement and HAP contract must include a certification by the owner that the owner and other project principals are not on the U.S. General Services Administration list of parties excluded from federal procurement and non-procurement programs.

The owner must also disclose any possible conflict of interest that would be a violation of the Agreement, the HAP contract, or HUD regulations.

17-IV.D. COMPLETION OF HOUSING

The Agreement must specify the deadlines for completion of the housing, and the owner must develop and complete the housing in accordance with these deadlines. The Agreement must also specify the deadline for submission by the owner of the required evidence of completion.

Evidence of Completion [24 CFR 983.155(b)]

At a minimum, the owner must submit the following evidence of completion to the PHA in the form and manner required by the PHA:

- Owner certification that the work has been completed in accordance with HQS and all requirements of the Agreement; and
- Owner certification that the owner has complied with labor standards and equal opportunity requirements in development of the housing.

At the PHA's discretion, the Agreement may specify additional documentation that must be submitted by the owner as evidence of housing completion.

PHA Policy

The PHA will determine the need for the owner to submit additional documentation as evidence of housing completion on a case-by-case basis depending on the nature of the PBV project. The PHA will specify any additional documentation requirements in the Agreement to enter into HAP contract.

PHA Acceptance of Completed Units [24 CFR 983.156]

Upon notice from the owner that the housing is completed, the PHA must inspect to determine if the housing has been completed in accordance with the Agreement, including compliance with HQS and any additional requirements imposed under the Agreement. The PHA must also determine if the owner has submitted all required evidence of completion.

If the work has not been completed in accordance with the Agreement, the PHA must not enter into the HAP contract.

If the PHA determines the work has been completed in accordance with the Agreement and that the owner has submitted all required evidence of completion, the PHA must submit the HAP contract for execution by the owner and must then execute the HAP contract.

PART V: HOUSING ASSISTANCE PAYMENTS CONTRACT (HAP)

17-V.A. OVERVIEW

The PHA must enter into a HAP contract with an owner for units that are receiving PBV assistance. The purpose of the HAP contract is to provide housing assistance payments for eligible families. Housing assistance is paid for contract units leased and occupied by eligible families during the HAP contract term. The HAP contract must be in the form required by HUD [24 CFR 983.202].

17-V.B. HAP CONTRACT REQUIREMENTS

Contract Information [24 CFR 983.203]

The HAP contract must specify the following information:

- The total number of contract units by number of bedrooms;
- The project's name, street address, city or county, state and zip code, block and lot number (if known), and any other information necessary to clearly identify the site and the building;
- The number of contract units in each building, the location of each contract unit, the area of each contract unit, and the number of bedrooms and bathrooms in each contract unit;
- Services, maintenance, and equipment to be supplied by the owner and included in the rent to owner;
- Utilities available to the contract units, including a specification of utility services to be paid by the owner (included in rent) and utility services to be paid by the tenant;
- Features provided to comply with program accessibility requirements of Section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR part 8;
- The HAP contract term;
- The number of units in any project that will exceed the 25 percent per project cap, which will be set-aside for occupancy by qualifying families; and
- The initial rent to owner for the first 12 months of the HAP contract term.

Execution of the HAP Contract [24 CFR 983.204]

The PHA may not enter into a HAP contract until each contract unit has been inspected and the PHA has determined that the unit complies with the Housing Quality Standards (HQS). For existing housing, the HAP contract must be executed promptly after the PHA selects the owner proposal and inspects the housing units. For newly constructed or rehabilitated housing the HAP contract must be executed after the PHA has inspected the completed units and has determined that the units have been completed in accordance with the agreement to enter into HAP, and the owner furnishes all required evidence of completion.

PHA Policy

For existing housing, the HAP contract will be executed within 60 calendar days of the PHA determining that all units pass HQS.

For rehabilitated or newly constructed housing, the HAP contract will be executed within 60 calendar days of the PHA determining that the units have been completed in accordance with the agreement to enter into HAP, all units meet HQS, and the owner has submitted all required evidence of completion.

Term of HAP Contract [FR Notice 11/24/08]

The PHA may enter into a HAP contract with an owner for an initial term of no less than one year and no more than 15 years.

PHA Policy

The term of all PBV HAP contracts will be negotiated with the owner annually.

At any time before expiration of the HAP contract, the PHA may extend the term of the contract for an additional term of up to 15 years if the PHA determines an extension is appropriate to continue providing affordable housing for low-income families or to expand housing opportunities. Subsequent extensions are subject to the same limitations. All extensions must be on the form and subject to the conditions prescribed by HUD at the time of the extension.

PHA Policy

When determining whether or not to extend an expiring PBV contract, the PHA will consider several factors including, but not limited to:

- The cost of extending the contract and the amount of available budget authority;
- The condition of the contract units;
- The owner's record of compliance with obligations under the HAP contract and lease(s);
- Whether the location of the units continues to support the goals of de-concentrating poverty and expanding housing opportunities; and
- Whether the funding could be used more appropriately for tenant-based assistance.

Termination by PHA [24 CFR 983.205(c)]

The HAP contract must provide that the term of the PHA's contractual commitment is subject to the availability of sufficient appropriated funding as determined by HUD or by the PHA in accordance with HUD instructions. For these purposes, sufficient funding means the availability of appropriations, and of funding under the ACC from such appropriations, to make full payment of housing assistance payments payable to the owner for any contract year in accordance with the terms of the HAP contract.

If it is determined that there may not be sufficient funding to continue housing assistance payments for all contract units and for the full term of the HAP contract, the PHA may terminate the HAP contract by notice to the owner. The termination must be implemented in accordance with HUD instructions.

Termination by Owner [24 CFR 983.205(d) , FR Notice 11/24/08]

If in accordance with program requirements the amount of rent to an owner for any contract unit is reduced below the amount of the rent to owner at the beginning of the HAP contract term, the owner may terminate the HAP contract by giving notice to the PHA. In this case, families living in the contract units must be offered tenant-based assistance.

At their discretion PHAs may specify in the HAP contract that the maximum rent on a unit will not be less than the initial rent.

Remedies for HQS Violations [24 CFR 983.207(b)]

The PHA may not make any HAP payment to the owner for a contract unit during any period in which the unit does not comply with HQS. If the PHA determines that a contract does not comply with HQS, the PHA may exercise any of its remedies under the HAP contract, for any or all of the contract units. Available remedies include termination of housing assistance payments, abatement or reduction of housing assistance payments, reduction of contract units, and termination of the HAP contract.

PHA Policy

The PHA will abate and terminate PBV HAP contracts for non-compliance with HQS in accordance with the policies used in the tenant-based voucher program. These policies are contained in Section 8-II.G., Enforcing Owner Compliance.

17-V.C. AMENDMENTS TO THE HAP CONTRACTPHA Policy

The PHA will consider adding contract units to the HAP contract when the PHA determines that additional housing is needed to serve eligible low-income families. Circumstances may include, but are not limited to:

The local housing inventory is reduced due to a disaster (either due to loss of housing units, or an influx of displaced families); and

Voucher holders are having difficulty finding units that meet program requirements.

17-V.D. HAP CONTRACT YEAR, ANNIVERSARY AND EXPIRATION DATES [24 CFR 983.206(c) and 983.302(e)]

The HAP contract year is the period of 12 calendar months preceding each annual anniversary of the HAP contract during the HAP contract term. The initial contract year is calculated from the first day of the first calendar month of the HAP contract term.

The annual anniversary of the HAP contract is the first day of the first calendar month after the end of the preceding contract year.

There is a single annual anniversary and expiration date for all units under a particular HAP contract, even in cases where contract units are placed under the HAP contract in stages (on different dates) or units are added by amendment. The anniversary and expiration dates for all units coincide with the dates for the contract units that were originally placed under contract.

17-V.E. OWNER RESPONSIBILITIES UNDER THE HAP [24 CFR 983.209]

When the owner executes the HAP contract s/he certifies that at such execution and at all times during the term of the HAP contract:

- All contract units are in good condition and the owner is maintaining the premises and contract units in accordance with HQS;
- The owner is providing all services, maintenance, equipment and utilities as agreed to under the HAP contract and the leases;
- Each contract unit for which the owner is receiving HAP, is leased to an eligible family referred by the PHA, and the lease is in accordance with the HAP contract and HUD requirements;
- To the best of the owner's knowledge the family resides in the contract unit for which the owner is receiving HAP, and the unit is the family's only residence;
- The owner (including a principal or other interested party) is not the spouse, parent, child, grandparent, grandchild, sister, or brother of any member of a family residing in a contract unit;
- The amount of the HAP the owner is receiving is correct under the HAP contract;
- The rent for contract units does not exceed rents charged by the owner for comparable unassisted units;
- Except for HAP and tenant rent, the owner has not received and will not receive any other payment or consideration for rental of the contract unit; and
- The family does not own or have any interest in the contract unit.

17-V.F. ADDITIONAL HAP REQUIREMENTS

Housing Quality and Design Requirements [24 CFR 983.101(e) and 983.207(a)]

The owner is required to maintain and operate the contract units and premises in accordance with HQS, including performance of ordinary and extraordinary maintenance. The owner must provide all the services, maintenance, equipment, and utilities specified in the HAP contract with the PHA and in the lease with each assisted family. In addition, maintenance, replacement and redecoration must be in accordance with the standard practice for the building as established by the owner.

The PHA may elect to establish additional requirements for quality, architecture, or design of PBV housing. Any such additional requirements must be specified in the Agreement to enter into a HAP contract and the HAP contract. These requirements must be in addition to, not in place of, compliance with HQS.

PHA Policy

The PHA will identify the need for any special features on a case-by-case basis depending on the intended occupancy of the PBV project. The PHA will specify any special design standards or additional requirements in the invitation for PBV proposals, the agreement to enter into HAP contract, and the HAP contract.

Vacancy Payments [24 CFR 983.352(b)]

PHA Policy

The PHA will decide on a case-by-case basis if the PHA will provide vacancy payments to the owner. The HAP contract with the owner will contain any such agreement, including the amount of the vacancy payment and the period for which the owner will qualify for these payments.

If the PHA determines that the owner is responsible for a vacancy and, as a result, is not entitled to the keep the housing assistance payment, the PHA will notify the landlord of the amount of housing assistance payment that the owner must repay. The PHA will require the owner to repay the amount owed in accordance with the policies in Section 16-IV.B and/or the PHA may withhold the amount owed.

PART VI: SELECTION OF PBV PROGRAM PARTICIPANTS

17-VI.A. OVERVIEW

Many of the provisions of the tenant-based voucher regulations [24 CFR 982] also apply to the PBV program. This includes requirements related to determining eligibility and selecting applicants from the waiting list. Even with these similarities, there are requirements that are unique to the PBV program. This part describes the requirements and policies related to eligibility and admission to the PBV program.

17-VI.B. ELIGIBILITY FOR PBV ASSISTANCE [24 CFR 983.251(a) and (b)]

The PHA may select families for the PBV program from those who are participants in the PHA's tenant-based voucher program and from those who have applied for admission to the voucher program. For voucher participants, eligibility was determined at original admission to the voucher program and does not need to be re-determined at the commencement of PBV assistance. For all others, eligibility for admission must be determined at the commencement of PBV assistance.

Applicants for PBV assistance must meet the same eligibility requirements as applicants for the tenant-based voucher program. Applicants must qualify as a family as defined by HUD and the PHA, have income at or below HUD-specified income limits, and qualify on the basis of citizenship or the eligible immigration status of family members [24 CFR 982.201(a) and 24 CFR 983.2(a)]. In addition, an applicant family must provide social security information for family members [24 CFR 5.216 and 5.218] and consent to the PHA's collection and use of family information regarding income, expenses, and family composition [24 CFR 5.230]. An applicant family must also meet HUD requirements related to current or past criminal activity.

PHA Policy

The PHA will determine an applicant family's eligibility for the PBV program in accordance with the policies in Chapter 3.

In-Place Families [24 CFR 983.251(b)]

An eligible family residing in a proposed PBV contract unit on the date the proposal is selected by the PHA is considered an "in-place family." These families are afforded protection from displacement under the PBV rule. If a unit to be placed under contract (either an existing unit or a unit requiring rehabilitation) is occupied by an eligible family on the date the proposal is selected, the in-place family must be placed on the PHA's waiting list. Once the family's continued eligibility is determined (the PHA may deny assistance to an in-place family for the grounds specified in 24 CFR 982.552 and 982.553), the family must be given an absolute selection preference and the PHA must refer these families to the project owner for an appropriately sized PBV unit in the project. Admission of eligible in-place families is not subject to income targeting requirements.

This regulatory protection from displacement does not apply to families that are not eligible to participate in the program on the proposal selection date.

17-VLC. ORGANIZATION OF THE WAITING LIST [24 CFR 983.251(c)]

The PHA may establish a separate waiting list for PBV units or it may use the same waiting list for both tenant-based and PBV assistance. The PHA may also merge the PBV waiting list with a waiting list for other assisted housing programs offered by the PHA. If the PHA chooses to offer a separate waiting list for PBV assistance, the PHA must offer to place applicants who are listed on the tenant-based waiting list on the waiting list for PBV assistance.

If a PHA decides to establish a separate PBV waiting list, the PHA may use a single waiting list for the PHA's whole PBV program, or it may establish separate waiting lists for PBV units in particular projects or buildings or for sets of such units.

PHA Policy

The PHA will establish and manage separate waiting lists for individual projects or buildings that are receiving PBV assistance. The PHA currently has waiting lists for the following PBV projects:

Beyanihan House

17-VLD. SELECTION FROM THE WAITING LIST [24 CFR 983.251(c)]

Applicants who will occupy units with PBV assistance must be selected from the PHA's waiting list. The PHA may establish selection criteria or preferences for occupancy of particular PBV units. The PHA may place families referred by the PBV owner on its PBV waiting list.

Income Targeting [24 CFR 983.251(c)(6)]

At least 75 percent of the families admitted to the PHA's tenant-based and project-based voucher programs during the PHA fiscal year from the waiting list must be extremely-low income families. The income targeting requirement applies to the total of admissions to both programs.

Units with Accessibility Features [24 CFR 983.251(c)(7)]

When selecting families to occupy PBV units that have special accessibility features for persons with disabilities, the PHA must first refer families who require such features to the owner.

Preferences [24 CFR 983.251(d), FR Notice 11/24/08]

The PHA may use the same selection preferences that are used for the tenant-based voucher program, establish selection criteria or preferences for the PBV program as a whole, or for occupancy of particular PBV developments or units. The PHA must provide an absolute selection preference for eligible in-place families as described in Section 17-VI.B. above.

Although the PHA is prohibited from granting preferences to persons with a specific disability, the PHA may give preference to disabled families who need services offered at a particular project or site if the preference is limited to families (including individuals):

- With disabilities that significantly interfere with their ability to obtain and maintain themselves in housing;
- Who, without appropriate supportive services, will not be able to obtain or maintain themselves in housing; and
- For whom such services cannot be provided in a non-segregated setting.

In advertising such a project, the owner may advertise the project as offering services for a particular type of disability; however, the project must be open to all otherwise eligible disabled persons who may benefit from services provided in the project. In these projects, disabled residents may not be required to accept the particular services offered as a condition of occupancy.

If the PHA has projects with more than 25 percent of the units receiving project-based assistance because those projects include “excepted units” (units specifically made available for elderly or disabled families, or families receiving supportive services), the PHA must give preference to such families when referring families to these units [24 CFR 983.261(b)].

PHA Policy

The PHA will provide a selection preference when required by the regulation (e.g., eligible in-place families, qualifying families for “excepted units,” mobility impaired persons for accessible units). The PHA will not offer any additional preferences for the PBV program or for particular PBV projects or units.

17-VLE. OFFER OF PBV ASSISTANCE

Refusal of Offer [24 CFR 983.251(e)(3)]

The PHA is prohibited from taking any of the following actions against a family who has applied for, received, or refused an offer of PBV assistance:

- Refuse to list the applicant on the waiting list for tenant-based voucher assistance;
- Deny any admission preference for which the applicant qualifies;
- Change the applicant's place on the waiting list based on preference, date, and time of application, or other factors affecting selection under the PHA's selection policy;
- Remove the applicant from the tenant-based voucher waiting list.

Disapproval by Landlord [24 CFR 983.251(e)(2)]

If a PBV owner rejects a family for admission to the owner's units, such rejection may not affect the family's position on the tenant-based voucher waiting list.

Acceptance of Offer [24 CFR 983.252]

Family Briefing

When a family accepts an offer for PBV assistance, the PHA must give the family an oral briefing. The briefing must include information on how the program works and the responsibilities of the family and owner. In addition to the oral briefing, the PHA must provide a briefing packet that explains how the PHA determines the total tenant payment for a family, the family obligations under the program, and applicable fair housing information.

PHA Policy

The PHA will provide the following briefing packet:

- Fair Market Rates (FMR) for San Francisco City & County
- Utility Allowances Schedule
- Record of Family's Search for Housing
- Beyond Normal Wear & Tear List
- Brochure 'Protect Your Family from Lead in Your Home'
- 17 Facts you should know about Section 8
- Portability Information (Contact Information, Instructions, Request Form)
- Steps to using your Section 8 Voucher
- Tips on how to find a Section 8 Unit
- Basic Version (sample) of Section 8 Rental Contract
- Housing Discrimination Complaint Form

- SFHA Informal Hearing Procedure
- Brochure ‘A Good Place to Live’
- Supplemental Materials
- Family Self Sufficiency Brochure
- Emergency funds for Housing
- Available Housing Listings
- Expanding Housing Opportunities Information
- Request for Tenancy Approval (w/ original stamp)

Persons with Disabilities

If an applicant family’s head or spouse is disabled, the PHA must assure effective communication, in accordance with 24 CFR 8.6, in conducting the oral briefing and in providing the written information packet. This may include making alternative formats available (see Chapter 2). In addition, the PHA must have a mechanism for referring a family that includes a member with a mobility impairment to an appropriate accessible PBV unit.

Persons with Limited English Proficiency

The PHA should take reasonable steps to assure meaningful access by persons with limited English proficiency in accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166 (see Chapter 2).

17-VLF. OWNER SELECTION OF TENANTS

The owner is responsible for developing written tenant selection procedures that are consistent with the purpose of improving housing opportunities for very low-income families and reasonably related to program eligibility and an applicant's ability to fulfill their obligations under the lease. An owner must promptly notify in writing any rejected applicant of the grounds for any rejection [24 CFR 983.253(a)(2) and (a)(3)].

Leasing [24 CFR 983.253(a)]

During the term of the HAP contract, the owner must lease contract units to eligible families that are selected and referred by the PHA from the PHA's waiting list. The contract unit leased to the family must be the appropriate size unit for the size of the family, based on the PHA's subsidy standards.

Filling Vacancies [24 CFR 983.254(a)]

The owner must promptly notify the PHA of any vacancy or expected vacancy in a contract unit. After receiving such notice, the PHA must make every reasonable effort to promptly refer a sufficient number of families for the owner to fill such vacancies. The PHA and the owner must make reasonable efforts to minimize the likelihood and length of any vacancy.

PHA Policy

The owner must notify the PHA in writing (mail, fax, or e-mail) within 5 business days of learning about any vacancy or expected vacancy.

The PHA will make every reasonable effort to refer families to the owner within 30 calendar days of receiving such notice from the owner.

Reduction in HAP Contract Units Due to Vacancies [24 CFR 983.254(b)]

If any contract units have been vacant for 120 or more days since owner notice of the vacancy, the PHA may give notice to the owner amending the HAP contract to reduce the number of contract units by subtracting the number of contract units (according to the bedroom size) that have been vacant for this period.

PHA Policy

If any contract units have been vacant for 120 days, the PHA will give notice to the owner that the HAP contract will be amended to reduce the number of contract units that have been vacant for this period. The PHA will provide the notice to the owner within 15 business days of the 120th day of the vacancy. The amendment to the HAP contract will be effective the 1st day of the month following the date of the PHA's notice.

17-VLG. TENANT SCREENING [24 CFR 983.255]

PHA Responsibility

The PHA is not responsible or liable to the owner or any other person for the family's behavior or suitability for tenancy. However, the PHA may opt to screen applicants for family behavior or suitability for tenancy and may deny applicants based on such screening.

PHA Policy

The PHA will not conduct screening to determine a PBV applicant family's suitability for tenancy.

The PHA must provide the owner with an applicant family's current and prior address (as shown in PHA records) and the name and address (if known by the PHA) of the family's current landlord and any prior landlords.

In addition, the PHA may offer the owner other information the PHA may have about a family, including information about the tenancy history of family members or about drug trafficking and criminal activity by family members. The PHA must provide applicant families a description of the PHA policy on providing information to owners, and the PHA must give the same types of information to all owners.

PHA Policy

The PHA will inform owners of their responsibility to screen prospective tenants, and will provide owners with the required known name and address information, at the time of the turnover HQS inspection or before. The PHA will not provide any additional information to the owner, such as tenancy history, criminal history, etc.

Owner Responsibility

The owner is responsible for screening and selection of the family to occupy the owner's unit. When screening families the owner may consider a family's background with respect to the following factors:

- Payment of rent and utility bills;
- Caring for a unit and premises;
- Respecting the rights of other residents to the peaceful enjoyment of their housing;
- Drug-related criminal activity or other criminal activity that is a threat to the health, safety, or property of others; and
- Compliance with other essential conditions of tenancy.

PART VII: OCCUPANCY

17-VII.A. OVERVIEW

After an applicant has been selected from the waiting list, determined eligible by the PHA, referred to an owner and determined suitable by the owner, the family will sign the lease and occupancy of the unit will begin.

17-VII.B. LEASE [24 CFR 983.256]

The tenant must have legal capacity to enter a lease under state and local law. *Legal capacity* means that the tenant is bound by the terms of the lease and may enforce the terms of the lease against the owner.

Form of Lease [24 CFR 983.256(b)]

The tenant and the owner must enter into a written lease agreement that is signed by both parties. If an owner uses a standard lease form for rental units to unassisted tenants in the locality or premises, the same lease must be used for assisted tenants, except that the lease must include a HUD-required tenancy addendum. The tenancy addendum must include, word-for-word, all provisions required by HUD.

If the owner does not use a standard lease form for rental to unassisted tenants, the owner may use another form of lease, such as a PHA model lease.

The PHA may review the owner's lease form to determine if the lease complies with state and local law. If the PHA determines that the lease does not comply with state or local law, the PHA may decline to approve the tenancy.

PHA Policy

The PHA will not review the owner's lease for compliance with state or local law.

Lease Requirements [24 CFR 983.256(c)]

The lease for a PBV unit must specify all of the following information:

- The names of the owner and the tenant;
- The unit rented (address, apartment number, if any, and any other information needed to identify the leased contract unit);
- The term of the lease (initial term and any provision for renewal);
- The amount of the tenant rent to owner, which is subject to change during the term of the lease in accordance with HUD requirements;
- A specification of the services, maintenance, equipment, and utilities that will be provide by the owner; and
- The amount of any charges for food, furniture, or supportive services.

Tenancy Addendum [24 CFR 983.256(d)]

The tenancy addendum in the lease must state:

- The program tenancy requirements;
- The composition of the household as approved by the PHA (the names of family members and any PHA-approved live-in aide);
- All provisions in the HUD-required tenancy addendum must be included in the lease. The terms of the tenancy addendum prevail over other provisions of the lease.

Initial Term and Lease Renewal [24 CFR 983.256(f) and 983.257(b)]

The initial lease term must be for at least one year. Upon expiration of the lease, an owner may renew the lease, refuse to renew the lease for “good cause,” or refuse to renew the lease without good cause. If the owner refuses to renew the lease without good cause, the PHA must provide the family with a tenant-based voucher and remove the unit from the PBV HAP contract.

Changes in the Lease [24 CFR 983.256(e)]

If the tenant and owner agree to any change in the lease, the change must be in writing, and the owner must immediately give the PHA a copy of all changes.

The owner must notify the PHA in advance of any proposed change in the lease regarding the allocation of tenant and owner responsibilities for utilities. Such changes may only be made if approved by the PHA and in accordance with the terms of the lease relating to its amendment. The PHA must re-determine reasonable rent, in accordance with program requirements, based on any change in the allocation of the responsibility for utilities between the owner and the tenant. The re-determined reasonable rent will be used in calculation of the rent to owner from the effective date of the change.

Owner Termination of Tenancy [24 CFR 983.257]

With two exceptions, the owner of a PBV unit may terminate tenancy for the same reasons an owner may in the tenant-based voucher program (see Section 12-III.B. and 24 CFR 982.310). In the PBV program, terminating tenancy for “good cause” does not include doing so for a business or economic reason, or a desire to use the unit for personal or family use or other non-residential purpose.

Non-Compliance with Supportive Services Requirement [24 CFR 983.257(c), FR Notice 11/24/08]

If a family is living in a project-based unit that is excepted from the 25 percent per project cap on project-basing because of participation in a supportive services program (e.g., Family Self-Sufficiency), and the family fails to complete its supportive services requirement without good cause, such failure is grounds for lease termination by the owner.

Tenant Absence from the Unit [24 CFR 983.256(g) and 982.312(a)]

The owner may specify in the lease a maximum period of tenant absence from the unit that is shorter than the maximum period permitted by PHA policy. According to program requirements, the family’s assistance must be terminated if they are absent from the unit for more than 180 consecutive days.

Security Deposits [24 CFR 983.258]

The owner may collect a security deposit from the tenant. The PHA may prohibit security deposits in excess of private market practice, or in excess of amounts charged by the owner to unassisted tenants.

PHA Policy

The PHA will allow the owner to collect a security deposit amount the owner determines is appropriate.

When the tenant moves out of a contract unit, the owner, subject to state and local law, may use the security deposit, including any interest on the deposit, in accordance with the lease, as reimbursement for any unpaid tenant rent, damages to the unit, or other amounts owed by the tenant under the lease.

The owner must give the tenant a written list of all items charged against the security deposit and the amount of each item. After deducting the amount used to reimburse the owner, the owner must promptly refund the full amount of the balance to the tenant.

If the security deposit does not cover the amount owed by the tenant under the lease, the owner may seek to collect the balance from the tenant. The PHA has no liability or responsibility for payment of any amount owed by the family to the owner.

17-VII.C. MOVES

Overcrowded, Under-Occupied, and Accessible Units [24 CFR 983.259]

If the PHA determines that a family is occupying a wrong size unit, based on the PHA's subsidy standards, or a unit with accessibility features that the family does not require, and the unit is needed by a family that does require the features, the PHA must promptly notify the family and the owner of this determination, and the PHA must offer the family the opportunity to receive continued housing assistance in another unit.

PHA Policy

The PHA will notify the family and the owner of the family's need to move based on the occupancy of a wrong-size or accessible unit within 10 business days of the PHA's determination. The PHA will offer the family the following types of continued assistance in the following order, based on the availability of assistance:

PBV assistance in the same building or project;

PBV assistance in another project; and

Tenant-based voucher assistance, if available and upon PHA discretion

If the PHA offers the family a tenant-based voucher, the PHA must terminate the housing assistance payments for a wrong-sized or accessible unit at expiration of the term of the family's voucher (including any extension granted by the PHA).

If the PHA offers the family another form of assistance that is not a tenant-based voucher, and the family does not accept the offer, does not move out of the PBV unit within a reasonable time as determined by the PHA, or both, the PHA must terminate the housing assistance payments for the unit at the expiration of a reasonable period as determined by the PHA.

PHA Policy

When the PHA offers a family another form of assistance that is not a tenant-based voucher, the family will be given 30 days from the date of the offer to accept the offer and move out of the PBV unit. If the family does not move out within this 30-day time frame, the PHA will terminate the housing assistance payments at the expiration of this 30-day period.

The PHA may make exceptions to this 30-day period if needed for reasons beyond the family's control such as death, serious illness, or other medical emergency of a family member.

Family Right to Move [24 CFR 983.260]

The family may terminate the lease at any time after the first year of occupancy. The family must give advance written notice to the owner in accordance with the lease and provide a copy of such notice to the PHA. If the family wishes to move with continued tenant-based assistance, the family must contact the PHA to request the rental assistance prior to providing notice to terminate the lease.

If the family terminates the lease in accordance with these requirements, the PHA is required to offer the family the opportunity for continued tenant-based assistance, in the form of a voucher or other comparable tenant-based rental assistance. If voucher or other comparable tenant-based assistance is not immediately available upon termination of the family's lease in the PBV unit, the PHA must give the family priority to receive the next available opportunity for continued tenant-based assistance.

If the family terminates the assisted lease before the end of the first year, the family relinquishes the opportunity for continued tenant-based assistance.

17-VII.D. EXCEPTIONS TO THE OCCUPANCY CAP [24 CFR 983.261, FR Notice 11/24/08]

The PHA may not pay housing assistance under a PBV HAP contract for more than 25 percent of the number of dwelling units in a project unless the units are [24 CFR 983.56]:

- In a single-family building;
- Specifically made available for elderly or disabled families; or
- Specifically made available for families receiving supportive services as defined by the PHA. At least one member must be receiving at least one qualifying supportive service.

If a family at the time of initial tenancy is receiving and while the resident of an excepted unit has received Family Self-Sufficiency (FSS) supportive services or any other service as defined by the PHA and successfully completes the FSS contract of participation or the supportive services requirement, the unit continues to count as an excepted unit for as long as the family resides in the unit.

A family (or remaining members of a family) residing in an excepted unit that no longer meets the criteria for a “qualifying family” in connection with the 25 percent per project cap exception (e.g., the family does not successfully complete supportive services requirements, or due to a change in family composition the family is no longer elderly or disabled), must vacate the unit within a reasonable period of time established by the PHA, and the PHA must cease paying housing assistance payments on behalf of the non-qualifying family.

If the family fails to vacate the unit within the established time, the unit must be removed from the HAP contract unless the project is partially assisted, and it is possible for the HAP contract to be amended to substitute a different unit in the building in accordance with program requirements; or the owner terminates the lease and evicts the family. The housing assistance payments for a family residing in an excepted unit that is not in compliance with its family obligations to comply with supportive services requirements must be terminated by the PHA.

PHA Policy

The PHA will provide PBV assistance for excepted units.

PART VIII: DETERMINING RENT TO OWNER

17-VIII.A. OVERVIEW

The amount of the initial rent to an owner of units receiving PBV assistance is established at the beginning of the HAP contract term. Although for rehabilitated or newly constructed housing, the agreement to enter into HAP Contract (Agreement) states the estimated amount of the initial rent to owner, the actual amount of the initial rent to owner is established at the beginning of the HAP contract term.

During the term of the HAP contract, the rent to owner is re-determined at the owner's request in accordance with program requirements, and at such time that there is a five percent or greater decrease in the published FMR.

17-VIII.B. RENT LIMITS [24 CFR 983.301]

Except for certain tax credit units (discussed below), the rent to owner must not exceed the lowest of the following amounts:

- An amount determined by the PHA, not to exceed 110 percent of the applicable fair market rent (or any HUD-approved exception payment standard) for the unit bedroom size minus any utility allowance;
- The reasonable rent; or
- The rent requested by the owner.

Certain Tax Credit Units [24 CFR 983.301(c), FR Notice 11/24/08]

For certain tax credit units, the rent limits are determined differently than for other PBV units. These different limits apply to contract units that meet all of the following criteria:

- The contract unit receives a low-income housing tax credit under the Internal Revenue Code of 1986;
- The contract unit is not located in a qualified census tract;
- There are comparable tax credit units of the same bedroom size as the contract unit in the same building, and the comparable tax credit units do not have any form of rental assistance other than the tax credit; and
- The tax credit rent exceeds a PHA-determined amount (not to exceed 110 percent of the fair market rent or any approved exception payment standard);

For contract units that meet all of these criteria, the rent to owner must not exceed the lowest of:

- The tax credit rent minus any utility allowance;
- The reasonable rent; or
- The rent requested by the owner.

However, PHAs are permitted to use the higher Section 8 rent for a tax credit unit if the tax credit rent is less than the amount that would be permitted under Section 8. In these cases, Section 8 rent reasonableness requirements must continue to be met.

Definitions

A *qualified census tract* is any census tract (or equivalent geographic area defined by the Bureau of the Census) in which at least 50 percent of households have an income of less than 60 percent of Area Median Gross Income (AMGI), or where the poverty rate is at least 25 percent and where the census tract is designated as a qualified census tract by HUD.

Tax credit rent is the rent charged for comparable units of the same bedroom size in the building that also receive the low-income housing tax credit but do not have any additional rental assistance (e.g., tenant-based voucher assistance).

Use of FMRs, Exception Payment Standards, and Utility Allowances [24 CFR 983.301(f)]

When determining the initial rent to owner, the PHA must use the most recently published FMR in effect and the utility allowance schedule in effect at execution of the HAP contract. When re-determining the rent to owner, the PHA must use the most recently published FMR and the utility allowance schedule in effect at the time of redetermination. At its discretion, the PHA may for initial rent, use the amounts in effect at any time during the 30-day period immediately before the beginning date of the HAP contract, or for redeterminations of rent, the 30-day period immediately before the redetermination date.

Any HUD-approved exception payment standard amount under the tenant-based voucher program also applies to the project-based voucher program. HUD will not approve a different exception payment stand amount for use in the PBV program.

Likewise, the PHA may not establish or apply different utility allowance amounts for the PBV program. The same utility allowance schedule applies to both the tenant-based and project-based voucher programs.

PHA Policy

Upon written request by the owner, the PHA will consider using the FMR or utility allowances in effect during the 30-day period before the start date of the HAP, or redetermination of rent. The owner must explain the need to use the previous FMRs or utility allowances and include documentation in support of the request. The PHA will review and make a decision based on the circumstances and merit of each request.

In addition to considering a written request from an owner, the PHA may decide to use the FMR or utility allowances in effect during the 30-day period before the start date of the HAP, or redetermination of rent, if the PHA determines it is necessary due to PHA budgetary constraints.

Redetermination of Rent [24 CFR 983.302]

The PHA must re-determine the rent to owner upon the owner's request or when there is a five percent or greater decrease in the published FMR.

Rent Increase

If an owner wishes to request an increase in the rent to owner from the PHA, it must be requested at the annual anniversary of the HAP contract (see Section 17-V.D.). The request must be in writing and in the form and manner required by the PHA. The PHA may only make rent increases in accordance with the rent limits described previously. There are no provisions in the PBV program for special adjustments (e.g., adjustments that reflect increases in the actual and necessary expenses of owning and maintaining the units which have resulted from substantial general increases in real property taxes, utility rates, or similar costs).

PHA Policy

An owner's request for a rent increase must be submitted to the PHA 60 days prior to the anniversary date of the HAP contract, and must include the new rent amount the owner is proposing.

The PHA may not approve and the owner may not receive any increase of rent to owner until and unless the owner has complied with requirements of the HAP contract, including compliance with HQS. The owner may not receive any retroactive increase of rent for any period of noncompliance.

Rent Decrease

If there is a decrease in the rent to owner, as established in accordance with program requirements such as a change in the FMR or exception payment standard, or reasonable rent amount, the rent to owner must be decreased regardless of whether the owner requested a rent adjustment.

Notice of Rent Change

The rent to owner is re-determined by written notice by the PHA to the owner specifying the amount of the re-determined rent. The PHA notice of rent adjustment constitutes an amendment of the rent to owner specified in the HAP contract. The adjusted amount of rent to owner applies for the period of 12 calendar months from the annual anniversary of the HAP contract.

PHA Policy

The PHA will provide the owner with at least 30 days written notice of any change in the amount of rent to owner.

PHA-owned Units [24 CFR 983.301(g)]

For PHA-owned PBV units, the initial rent to owner and the annual redetermination of rent at the anniversary of the HAP contract are determined by the independent entity approved by HUD. The PHA must use the rent to owner established by the independent entity.

17-VIII.C. REASONABLE RENT [24 CFR 983.303]

At the time the initial rent is established and all times during the term of the HAP contract, the rent to owner for a contract unit may not exceed the reasonable rent for the unit as determined by the PHA.

When Rent Reasonable Determinations are Required

The PHA must re-determine the reasonable rent for a unit receiving PBV assistance whenever any of the following occur:

- There is a five percent or greater decrease in the published FMR in effect 60 days before the contract anniversary (for the unit sizes specified in the HAP contract) as compared with the FMR that was in effect one year before the contract anniversary date;
- The PHA approves a change in the allocation of responsibility for utilities between the owner and the tenant;
- The HAP contract is amended to substitute a different contract unit in the same building; or
- There is any other change that may substantially affect the reasonable rent.

How to Determine Reasonable Rent

The reasonable rent of a unit receiving PBV assistance must be determined by comparison to rent for other comparable unassisted units. When making this determination, the PHA must consider factors that affect market rent. Such factors include the location, quality, size, type and age of the unit, as well as the amenities, housing services maintenance, and utilities to be provided by the owner.

Comparability Analysis

For each unit, the comparability analysis must use at least three comparable units in the private unassisted market. This may include units in the premises or project that is receiving project-based assistance. The analysis must show how the reasonable rent was determined, including major differences between the contract units and comparable unassisted units, and must be retained by the PHA. The comparability analysis may be performed by PHA staff or by another qualified person or entity. Those who conduct these analyses or are involved in determining the housing assistance payment based on the analyses may not have any direct or indirect interest in the property.

PHA-owned Units

For PHA-owned units, the amount of the reasonable rent must be determined by an independent agency approved by HUD in accordance with PBV program requirements. The independent entity must provide a copy of the determination of reasonable rent for PHA-owned units to the PHA and to the HUD field office where the project is located.

Owner Certification of Reasonable Rent

By accepting each monthly housing assistance payment, the owner certifies that the rent to owner is not more than rent charged by the owner for other comparable unassisted units in the premises. At any time, the PHA may require the owner to submit information on rents charged by the owner for other units in the premises or elsewhere.

17-VIII.D. EFFECT OF OTHER SUBSIDY AND RENT CONTROL

In addition to the rent limits discussed in Section 17-VIII.B above, other restrictions may limit the amount of rent to owner in a PBV unit. In addition, certain types of subsidized housing are not even eligible to receive PBV assistance (see Section 17-II.D).

Other Subsidy [24 CFR 983.304]

At its discretion, a PHA may reduce the initial rent to owner because of other governmental subsidies, including grants and other subsidized financing.

For units receiving assistance under the HOME program, rents may not exceed rent limits as required by that program.

For units in any of the following types of federally subsidized projects, the rent to owner may not exceed the subsidized rent (basic rent) or tax credit rent as determined in accordance with requirements for the applicable federal program:

- An insured or non-insured Section 236 project;
- A formerly insured or non-insured Section 236 project that continues to receive Interest Reduction Payment following a decoupling action;
- A Section 221(d)(3) below market interest rate (BMIR) project;
- A Section 515 project of the Rural Housing Service;
- Any other type of federally subsidized project specified by HUD.

Combining Subsidy

Rent to owner may not exceed any limitation required to comply with HUD subsidy layering requirements.

Rent Control [24 CFR 983.305]

In addition to the rent limits set by PBV program regulations, the amount of rent to owner may also be subject to rent control or other limits under local, state, or federal law.

PART IX: PAYMENTS TO OWNER

17-IX.A. HOUSING ASSISTANCE PAYMENTS [24 CFR 983.351]

During the term of the HAP contract, the PHA must make housing assistance payments to the owner in accordance with the terms of the HAP contract. During the term of the HAP contract, payments must be made for each month that a contract unit complies with HQS and is leased to and occupied by an eligible family. The housing assistance payment must be paid to the owner on or about the first day of the month for which payment is due, unless the owner and the PHA agree on a later date.

Except for discretionary vacancy payments, the PHA may not make any housing assistance payment to the owner for any month after the month when the family moves out of the unit (even if household goods or property are left in the unit).

The amount of the housing assistance payment by the PHA is the rent to owner minus the tenant rent (total tenant payment minus the utility allowance).

In order to receive housing assistance payments, the owner must comply with all provisions of the HAP contract. Unless the owner complies with all provisions of the HAP contract, the owner does not have a right to receive housing assistance payments.

17-IX.B. VACANCY PAYMENTS [24 CFR 983.352]

If an assisted family moves out of the unit, the owner may keep the housing assistance payment for the calendar month when the family moves out. However, the owner may not keep the payment if the PHA determines that the vacancy is the owner's fault.

PHA Policy

If the PHA determines that the owner is responsible for a vacancy and, as a result, is not entitled to keep the housing assistance payment, the PHA will notify the landlord of the amount of housing assistance payment that the owner must repay. The PHA will require the owner to repay the amount owed in accordance with the policies in Section 16-IV.B.

At the discretion of the PHA, the HAP contract may provide for vacancy payments to the owner. The PHA may only make vacancy payments if:

- The owner gives the PHA prompt, written notice certifying that the family has vacated the unit and identifies the date when the family moved out (to the best of the owner's knowledge);
- The owner certifies that the vacancy is not the fault of the owner and that the unit was vacant during the period for which payment is claimed;
- The owner certifies that it has taken every reasonable action to minimize the likelihood and length of vacancy; and
- The owner provides any additional information required and requested by the PHA to verify that the owner is entitled to the vacancy payment.

The owner must submit a request for vacancy payments in the form and manner required by the PHA and must provide any information or substantiation required by the PHA to determine the amount of any vacancy payment.

PHA Policy

If an owner's HAP contract calls for vacancy payments to be made, and the owner wishes to receive vacancy payments, the owner must have properly notified the PHA of the vacancy in accordance with the policy in Section 17-VI.F. regarding filling vacancies.

In order for a vacancy payment request to be considered, it must be made within 10 business days of the end of the period for which the owner is requesting the vacancy payment. The request must include the required owner certifications and the PHA may require the owner to provide documentation to support the request. If the owner does not provide the information requested by the PHA within 10 business days of the PHA's request, no vacancy payments will be made.

17-IX.C. TENANT RENT TO OWNER [24 CFR 983.353]

The tenant rent is the portion of the rent to owner paid by the family. The amount of tenant rent is determined by the PHA in accordance with HUD requirements. Any changes in the amount of tenant rent will be effective on the date stated in the PHA notice to the family and owner.

The family is responsible for paying the tenant rent (total tenant payment minus the utility allowance). The amount of the tenant rent determined by the PHA is the maximum amount the owner may charge the family for rental of a contract unit. The tenant rent covers all housing services, maintenance, equipment, and utilities to be provided by the owner. The owner may not demand or accept any rent payment from the tenant in excess of the tenant rent as determined by the PHA. The owner must immediately return any excess payment to the tenant.

Tenant and PHA Responsibilities

The family is not responsible for the portion of rent to owner that is covered by the housing assistance payment and the owner may not terminate the tenancy of an assisted family for nonpayment by the PHA.

Likewise, the PHA is responsible only for making the housing assistance payment to the owner in accordance with the HAP contract. The PHA is not responsible for paying tenant rent, or any other claim by the owner, including damage to the unit. The PHA may not use housing assistance payments or other program funds (including administrative fee reserves) to pay any part of the tenant rent or other claim by the owner.

Utility Reimbursements

If the amount of the utility allowance exceeds the total tenant payment, the PHA must pay the amount of such excess to the tenant as a reimbursement for tenant-paid utilities, and the tenant rent to the owner must be zero.

The PHA may pay the utility reimbursement directly to the family or to the utility supplier on behalf of the family. If the PHA chooses to pay the utility supplier directly, the PHA must notify the family of the amount paid to the utility supplier.

PHA Policy

The PHA will make utility reimbursements to the family.

17-IX.D. OTHER FEES AND CHARGES [24 CFR 983.354]**Meals and Supportive Services**

With the exception of PBV assistance in assisted living developments, the owner may not require the tenant to pay charges for meals or supportive services. Non-payment of such charges is not grounds for termination of tenancy.

In assisted living developments receiving PBV assistance, the owner may charge for meals or supportive services. These charges may not be included in the rent to owner, nor may the value of meals and supportive services be included in the calculation of the reasonable rent. However, non-payment of such charges is grounds for termination of the lease by the owner in an assisted living development.

Other Charges by Owner

The owner may not charge extra amounts for items customarily included in rent in the locality or provided at no additional cost to unsubsidized tenants in the premises.

PART X: PHA OWNED HOUSING

[TERMINATION OF TENANCY, HOUSING ASSISTANCE PAYMENTS AND VOUCHER FOR RESIDENTS IN A PROPERTY CONVERTED FROM PUBLIC HOUSING TO PROJECT-BASED SECTION 8 AT THE TIME OF CONVERSION]

17-X.A. GENERAL PROVISIONS AND PURPOSE

PHA Policy

Units owned by the SFHA and not receiving subsidy under any other program are eligible housing units for the PBV Program. In order to comply with federal regulation, the SFHA will be request that the Regional HUD office conduct the provisions set forth pursuant to 24 CFR C\983.59, 983.301 (g) and 983.303(f).

It is intended that public housing tenants in units converted to the Project-based Voucher (“PBV”) program shall maintain the rights that they have as public housing residents after the conversion to PBVs to the extent that they don’t conflict with the Housing Choice Voucher Program (“HCV”) regulations or the rights of HCV tenants and where applicable, to the extent that they do not conflict with the continuing public housing rights contained herein. A tenant who is residing in a development at the time of the conversion will not lose their housing subsidy as a result of the conversion.

Any termination of the Lease and Housing Assistance Payments made on behalf of a Tenant shall be carried out in accordance with the lease or subsidy termination provisions. If there is a conflict between lease or subsidy termination provisions, the parties will review all applicable law including but not limited to Federal, State, and local law to find a resolution that is in the best interest of the parties involved.

The owner of the converted property may evict the Tenant and/or terminate the Housing Choice Voucher (HCV) or PBV in accordance with these rules. Except as noted below, the Tenant must be offered the Grievance Procedure before the owner of the converted property can file an eviction action against the Tenant. Regardless of the outcome of the eviction action, the Housing Authority cannot terminate the Tenant’s HCV without offering the Tenant an opportunity to request a grievance hearing pursuant to the Admissions and Continued Occupancy Policy (“ACOP”) of the San Francisco Housing Authority at the time of conversion.

17-X.B. TERMINATION OF PROJECT BASED VOUCHER (PBV) AND HOUSING CHOICE VOUCHER (HCV)

PHA Policy

The Housing Authority may seek to terminate PBV or HCV assistance for the Household and not pursue an eviction for reasons pursuant to the eligibility requirements in the Housing Choice Voucher Administrative Plan. The Housing Authority may seek to terminate the Tenant, if the Tenant household becomes over income, if the Tenant is in violation of 24 CFR 5.612 (restrictions on assistance to students enrolled in an institution of higher earning), if there is not at least one member of the Tenant household who has evidence of citizenship or eligible status, in accordance with 24 CFR part 5, subpart E, or for any other reason that may require termination of the subsidy because of a lack of continuing eligibility.

If the Housing Authority proposes to terminate the PBV or the HCV assistance, the Tenant must be given a 30-day notice stating the grounds for the termination with enough specificity to allow the Tenant to present a defense, and informing Tenant of the right to make such reply as Tenant may wish. The notice shall also inform the Tenant of the right to examine documents of the Housing Authority that are directly relevant to the Voucher termination, request a grievance hearing pursuant to the ACOP at the time of conveyance.

If the Tenant was a public housing tenant prior to conversion of the property, the Housing Authority shall not terminate the Tenant, if (i) the Tenant no longer meets the criteria for a “qualifying family”, for example does not successfully complete its family self-sufficiency (FSS) contract of participation or the supportive services requirement without good cause. See 24 CFR 983.301(d).

If the Tenant was a public housing tenant prior to conversion of the property and is occupying a wrong size unit, the housing authority shall offer the Tenant an available appropriately sized unit within the development. If there is no available appropriately sized unit in the development, the Housing Authority may assist the Tenant to find an appropriately sized unit where the family can use their HCV.

If the Tenant was a public housing tenant prior to conversion of the property, is occupying a unit with accessibility features that the family does not require, the unit is needed by another family that requires the accessibility features, the Housing Authority shall offer the Tenant another unit in the development. If there is no available unit in the development, the Housing Authority may assist the Tenant to find a unit where the family can use their HCV.

17-X.C. TERMINATION OF LEASE (EVICTION)PHA Policy

The owner of the converted property may seek to evict by providing a notice of lease termination.

The length of the notice shall be pursuant to the lease termination provisions in the Grievance Procedure at the time of conveyance.

The owner of the converted property shall give Tenant written notice of termination of the Lease stating the grounds for the termination with enough specificity to allow the Tenant to present a defense, and informing Tenant of the right to make such reply as Tenant may wish. The notice shall also inform Tenant of the right to examine his/her tenant file and all documents directly relevant to their lease. The opportunity to the Grievance Procedure may be waived where the conduct complained of is an immediate and direct threat to the health and safety of other residents or employees of the Housing Authority or the owner of the converted property.

When the owner of the converted property is not required to offer Tenant the opportunity of the Grievance Procedure, the notice of Lease termination shall:

- (i) state that Tenant is not entitled to the Grievance Procedure on the termination of tenancy and set forth the reason(s) for that determination.

Any notice to vacate or quit that is required by State or local law may be combined with, or run concurrently, with the notice of Lease termination pursuant to the Grievance Procedure at the time of Conveyance.

The owner of the converted property shall not evict a Tenant who was a public housing tenant prior to conversion of the property and no longer meets the criteria for a “qualifying family” without good cause. For example does not successfully complete its FSS contact of participation or the supportive services requirement unless they have good cause. See 24 CFR 983.301(d).

17-X.D. CONTINUATION OF ASSISTANCE PAYMENTS

During the pendency of the eviction action, the housing assistance payments shall not terminate (even if the Notice to Vacate under the State or Local law has expired)

If the Tenant has exhausted the Grievance Procedure or where the tenant is not entitled to a the Grievance Procedure and the Owner of the converted property continues to seek to terminate the tenancy, the Housing Authority shall continue the subsidy payment to owner of the converted property under the Housing Assistance Payment Contract until the Tenant has been dispossessed through a final judicial determination.

In the case of any proposed adverse action, other than an eviction, including a voucher subsidy termination, the Housing Authority and the owner of the converted property shall not take the proposed action until the time for the Tenant to use the Grievance Procedure has expired, and (if a hearing was timely requested by the Tenant) the Grievance Procedure has been completed and a decision has been issued.

17-X.E. GRIEVANCE PROCEDURE

PHA Policy

The Housing Authority Resident Grievance Procedures at the time of conversion shall apply.

GLOSSARY

A. ACRONYMS USED IN SUBSIDIZED HOUSING

AAF	Annual adjustment factor (published by HUD in the Federal Register and used to compute annual rent adjustments)
ACC	Annual contributions contract
ADA	Americans with Disabilities Act of 1990
BR	Bedroom
CDBG	Community Development Block Grant (Program)
CFR	Code of Federal Regulations (published federal rules that define and implement laws; commonly referred to as “the regulations”)
CPI	Consumer price index (published monthly by the Department of Labor as an inflation indicator)
EID	Earned income disallowance
EIV	Enterprise Income Verification
FDIC	Federal Deposit Insurance Corporation
FHA	Federal Housing Administration
FICA	Federal Insurance Contributions Act (established Social Security taxes)
FMR	Fair market rent
FR	Federal Register
FSS	Family Self-Sufficiency (Program)
FY	Fiscal year
FYE	Fiscal year end
GAO	Government Accountability Office
GR	Gross rent
HAP	Housing assistance payment
HCV	Housing choice voucher
HQS	Housing quality standards
HUD	Department of Housing and Urban Development
HUDCLIPS	HUD Client Information and Policy System
IPA	Independent public accountant
IRA	Individual Retirement Account
IRS	Internal Revenue Service

JTPA	Job Training Partnership Act
LBP	Lead-based paint
MSA	Metropolitan statistical area (established by the U.S. Census Bureau)
MTCS	Multi-family Tenant Characteristics System (now the Form HUD-50058 sub module of the PIC system)
MTW	Moving to Work
NOFA	Notice of funding availability
OIG	HUD's Office of Inspector General
OMB	Office of Management and Budget
PHA	Public housing agency
PIC	PIH Information Center
PIH	(HUD Office of) Public and Indian Housing
PS	Payment standard
QC	Quality control
QHWRA	Quality Housing and Work Responsibility Act of 1998 (also known as the Public Housing Reform Act)
REAC	(HUD) Real Estate Assessment Center
RFP	Request for proposals
RFTA	Request for tenancy approval
RIGI	Regional inspector general for investigation (handles fraud and program abuse matters for HUD at the regional office level)
SEMAP	Section 8 Management Assessment Program
SRO	Single room occupancy
SSA	Social Security Administration
SSI	Supplemental security income
TANF	Temporary assistance for needy families
TPV	Tenant protection vouchers
TR	Tenant rent
TTP	Total tenant payment
UA	Utility allowance
UIV	Upfront income verification
URP	Utility reimbursement payment

VAWA Violence Against Women Reauthorization Act of 2005

B. GLOSSARY OF SUBSIDIZED HOUSING TERMS

Absorption. In portability (under subpart H of this part 982): the point at which a receiving PHA stops billing the initial PHA for assistance on behalf of a portability family. The receiving PHA uses funds available under the receiving PHA consolidated ACC.

Accessible. The facility or portion of the facility can be approached, entered, and used by persons with disabilities.

Adjusted income. Annual income, less allowable HUD deductions and allowances.

Administrative fee. Fee paid by HUD to the PHA for administration of the program. See §982.152.

Administrative plan. The plan that describes PHA policies for administration of the tenant-based programs. The Administrative Plan and any revisions must be approved by the PHA's board and included as a supporting document to the PHA Plan. See §982.54.

Admission. The point when the family becomes a participant in the program. The date used for this purpose is the effective date of the first HAP contract for a family (first day of initial lease term) in a tenant-based program.

Amortization payment. In a manufactured home space rental: The monthly debt service payment by the family to amortize the purchase price of the manufactured home.

Annual contributions contract (ACC). The written contract between HUD and a PHA under which HUD agrees to provide funding for a program under the 1937 Act, and the PHA agrees to comply with HUD requirements for the program.

Annual income. The anticipated total income of an eligible family from all sources for the 12-month period following the date of determination of income, computed in accordance with the regulations.

Applicant (applicant family). A family that has applied for admission to a program but is not yet a participant in the program.

Area exception rent. An amount that exceeds the published FMR. See 24 CFR 982.504(b).

As-paid states. States where the welfare agency adjusts the shelter and utility component of the welfare grant in accordance with actual housing costs.

Assets. (See *net family assets.*)

Auxiliary aids. Services or devices that enable persons with impaired sensory, manual, or speaking skills to have an equal opportunity to participate in, and enjoy the benefits of, programs or activities receiving federal financial assistance.

Bifurcate. With respect to a public housing or Section 8 lease, to divide a lease as a matter of law such that certain tenants can be evicted or removed while the remaining family members' lease and occupancy rights are allowed to remain intact.

Budget authority. An amount authorized and appropriated by the Congress for payment to PHAs under the program. For each funding increment in a PHA program, budget authority is the

maximum amount that may be paid by HUD to the PHA over the ACC term of the funding increment.

Child. A member of the family other than the family head or spouse who is under 18 years of age.

Child care expenses. Amounts anticipated to be paid by the family for the care of children under 13 years of age during the period for which annual income is computed, but only where such care is necessary to enable a family member to actively seek employment, be gainfully employed, or to further his or her education and only to the extent such amounts are not reimbursed. The amount deducted shall reflect reasonable charges for child care. In the case of child care necessary to permit employment, the amount deducted shall not exceed the amount of employment income that is included in annual income.

Citizen. A citizen or national of the United States.

Cohead. An individual in the household who is equally responsible for the lease with the head of household. A family may have a cohead or spouse but not both. A cohead never qualifies as a dependent. The cohead must have legal capacity to enter into a lease.

Common space. In shared housing, the space available for use by the assisted family and other occupants of the unit.

Computer match. The automated comparison of databases containing records about individuals.

Confirmatory review. An on-site review performed by HUD to verify the management performance of a PHA.

Consent form. Any consent form approved by HUD to be signed by assistance applicants and participants to obtain income information from employers and SWICAs; return information from the Social Security Administration (including wages, net earnings from self-employment, and retirement income); and return information for unearned income from the IRS. Consent forms expire after a certain time and may authorize the collection of other information to determine eligibility or level of benefits.

Congregate housing. Housing for elderly persons or persons with disabilities that meets the HQS for congregate housing. A special housing type: see 24 CFR 982.606–609.

Contiguous MSA. In portability (under subpart H of part 982): An MSA that shares a common boundary with the MSA in which the jurisdiction of the initial PHA is located.

Continuously assisted. An applicant is continuously assisted under the 1937 Act if the family is already receiving assistance under any 1937 Housing Act program when the family is admitted to the voucher program.

Contract authority. The maximum annual payment by HUD to a PHA for a funding increment.

Cooperative (term includes mutual housing). Housing owned by a nonprofit corporation or association, and where a member of the corporation or association has the right to reside in a particular apartment, and to participate in management of the housing. A special housing type (see 24 CFR 982.619).

Covered families. Statutory term for families who are required to participate in a welfare agency economic self-sufficiency program and who may be subject to a welfare benefit sanction for noncompliance with this obligation. Includes families who receive welfare assistance or other public assistance under a program for which federal, state or local law requires that a member of the family must participate in an economic self-sufficiency program as a condition for the assistance.

Dating violence. Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:

- The length of the relationship
- The type of relationship
- The frequency of interaction between the persons involved in the relationship

Dependent. A member of the family (except foster children and foster adults) other than the family head or spouse, who is under 18 years of age, or is a person with a disability, or is a full-time student.

Dependent child. In the context of the student eligibility restrictions, a dependent child of a student enrolled in an institution of higher education. The dependent child must also meet the definition of *dependent* as specified above.

Disability assistance expenses. Reasonable expenses that are anticipated, during the period for which annual income is computed, for attendant care and auxiliary apparatus for a disabled family member, and that are necessary to enable a family member (including the disabled member) to be employed, provided that the expenses are neither paid to a member of the family nor reimbursed by an outside source.

Disabled family. A family whose head, co-head, spouse, or sole member is a person with disabilities; two or more persons with disabilities living together; or one or more persons with disabilities living with one or more live-in aides.

Disabled person. See *person with disabilities*.

Disallowance. Exclusion from annual income.

Displaced family. A family in which each member, or whose sole member, is a person displaced by governmental action, or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to federal disaster relief laws.

Domestic violence. Felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Domicile. The legal residence of the household head or spouse as determined in accordance with state and local law.

Drug-related criminal activity. As defined in 42 U.S.C. 1437f(f)(5).

Drug-trafficking. The illegal manufacture, sale, or distribution, or the possession with intent to manufacture, sell, or distribute, of a controlled substance as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802).

Economic self-sufficiency program. Any program designed to encourage, assist, train or facilitate the economic independence of assisted families, or to provide work for such families. Can include job training, employment counseling, work placement, basic skills training, education, English proficiency, Workfare, financial or household management, apprenticeship, or any other program necessary to ready a participant to work (such as treatment for drug abuse or mental health treatment). Includes any work activities as defined in the Social Security Act (42 U.S.C. 607(d)). Also see 24 CFR 5.603(c).

Elderly family. A family whose head, co-head, spouse, or sole member is a person who is at least 62 years of age; two or more persons who are at least 62 years of age living together; or one or more persons who are at least 62 years of age living with one or more live-in aides.

Elderly person. An individual who is at least 62 years of age.

Eligible family (Family). A family that is income eligible and meets the other requirements of the 1937 Act and Part 5 of 24 CFR.

Employer identification number (EIN). The nine-digit taxpayer identifying number that is assigned to an individual, trust, estate, partnership, association, company, or corporation.

Evidence of citizenship or eligible status. The documents which must be submitted as evidence of citizenship or eligible immigration status. (See 24 CFR 5.508(b).)

Extremely low-income family. A family whose annual income does not exceed 30 percent of the median income for the area, as determined by HUD, with adjustments for smaller and larger families. HUD may establish income ceilings higher or lower than 30 percent of median income if HUD finds such variations are necessary due to unusually high or low family incomes. (See 24 CFR 5.603.)

Facility. All or any portion of buildings, structures, equipment, roads, walks, parking lots, rolling stock, or other real or personal property or interest in the property.

Fair Housing Act. Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988.

Fair market rent (FMR). The rent, including the cost of utilities (except telephone), as established by HUD for units of varying sizes (by number of bedrooms), that must be paid in the housing market area to rent privately owned, existing, decent, safe, and sanitary rental housing of modest (non-luxury) nature with suitable amenities. See periodic publications in the *Federal Register* in accordance with 24 CFR Part 888.

Family. Includes but is not limited to the following, and can be further defined in PHA policy.

- A family with or without children (the temporary absence of a child from the home due to placement in foster care is not considered in determining family composition and family size)
- An elderly family or a near-elderly family
- A displaced family
- The remaining member of a tenant family
- A single person who is not an elderly or displaced person, or a person with disabilities, or the remaining member of a tenant family.

Family rent to owner. In the voucher program, the portion of rent to owner paid by the family.

Family self-sufficiency program (FSS program). The program established by a PHA in accordance with 24 CFR part 984 to promote self-sufficiency of assisted families, including the coordination of supportive services (42 U.S.C. 1437u).

Family share. The portion of rent and utilities paid by the family. For calculation of family share, see 24 CFR 982.515(a).

Family unit size. The appropriate number of bedrooms for a family, as determined by the PHA under the PHA subsidy standards.

Federal agency. A department of the executive branch of the Federal Government.

Foster child care payment. A payment to eligible households by state, local, or private agencies appointed by the state to administer payments for the care of foster children.

Full-time student. A person who is attending school or vocational training on a full-time basis (carrying a subject load that is considered full-time for day students under the standards and practices of the educational institution attended). (See 24 CFR 5.603)

Funding increment. Each commitment of budget authority by HUD to a PHA under the consolidated annual contributions contract for the PHA program.

Gross rent. The sum of the rent to owner plus any utility allowance.

Group home. A dwelling unit that is licensed by a state as a group home for the exclusive residential use of two to twelve persons who are elderly or persons with disabilities (including any live-in aide). (A special housing type: see 24 CFR 982.610–614.)

Handicap. Any condition or characteristic that renders a person an individual with handicaps. (See *person with disabilities*.)

HAP contract. The housing assistance payments contract. A written contract between the PHA and an owner for the purpose of providing housing assistance payments to the owner on behalf of an eligible family.

Head of household. The adult member of the family who is the head of the household for purposes of determining income eligibility and rent.

Household. A household includes additional people other than the family who, with the PHA's permission, live in an assisted unit, such as live-in aides, foster children, and foster adults.

Housing assistance payment. The monthly assistance payment by a PHA, which includes: (1) A payment to the owner for rent to the owner under the family's lease; and (2) An additional payment to the family if the total assistance payment exceeds the rent to owner.

Housing agency (HA). See *public housing agency*.

Housing quality standards (HQS). The HUD minimum quality standards for housing assisted under the voucher program.

HUD. The U.S. Department of Housing and Urban Development.

Immediate family member. A spouse, parent, brother, sister, or child of that person, or an individual to whom that person stands in the position or place of a parent; or any other person living in the household of that person and related to that person by blood and marriage.

Imputed asset. An asset disposed of for less than fair market value during the two years preceding examination or reexamination.

Imputed income. The HUD passbook rate multiplied by the total cash value of assets. The calculation is used when net family assets exceed \$5,000.

Imputed welfare income. An amount of annual income that is not actually received by a family as a result of a specified welfare benefit reduction, but is included in the family's annual income and therefore reflected in the family's rental contribution.

Income. Income from all sources of each member of the household, as determined in accordance with criteria established by HUD.

Income for eligibility. Annual income.

Income information means information relating to an individual's income, including:

- All employment income information known to current or previous employers or other income sources
- All information about wages, as defined in the state's unemployment compensation law, including any social security number; name of the employee; quarterly wages of the employee; and the name, full address, telephone number, and, when known, employer identification number of an employer reporting wages under a state unemployment compensation law
- Whether an individual is receiving, has received, or has applied for unemployment compensation, and the amount and the period received
- Unearned IRS income and self-employment wages and retirement income
- Wage, social security, and supplemental security income data obtained from the Social Security Administration.

Individual with handicaps. See *person with disabilities*.

Initial PHA. In portability, the term refers to both: (1) A PHA that originally selected a family that later decides to move out of the jurisdiction of the selecting PHA; and (2) A PHA that absorbed a family that later decides to move out of the jurisdiction of the absorbing PHA.

Initial payment standard. The payment standard at the beginning of the HAP contract term.

Initial rent to owner. The rent to owner at the beginning of the HAP contract term.

Institution of higher education. An institution of higher education as defined in 20 U.S.C. 1001 and 1002. See Exhibit 3-2 in this Administrative Plan.

Jurisdiction. The area in which the PHA has authority under state and local law to administer the program.

Landlord. Either the owner of the property or his/her representative, or the managing agent or his/her representative, as shall be designated by the owner.

Lease. A written agreement between an owner and a tenant for the leasing of a dwelling unit to the tenant. The lease establishes the conditions for occupancy of the dwelling unit by a family with housing assistance payments under a HAP contract between the owner and the PHA.

Live-in aide. A person who resides with one or more elderly persons, or near-elderly persons, or persons with disabilities, and who:

- Is determined to be essential to the care and well-being of the persons;
- Is not obligated for the support of the persons; and
- Would not be living in the unit except to provide the necessary supportive services.

Local Preference. A preference used by the PHA to select among applicant families.

Low-Income Family. A family whose income does not exceed 80 percent of the median income for the area as determined by HUD with adjustments for smaller or larger families, except that HUD may establish income limits higher or lower than 80 percent for areas with unusually high or low incomes.

Manufactured home. A manufactured structure that is built on a permanent chassis, is designed for use as a principal place of residence, and meets the HQS. (A special housing type: see 24 CFR 982.620 and 982.621.)

Manufactured home space. In manufactured home space rental: A space leased by an owner to a family. A manufactured home owned and occupied by the family is located on the space. See 24 CFR 982.622 to 982.624.

Medical expenses. Medical expenses, including medical insurance premiums, that are anticipated during the period for which annual income is computed, and that are not covered by insurance (a deduction for elderly or disabled families only). These allowances are given when calculating adjusted income for medical expenses in excess of 3 percent of annual income.

Minor. A member of the family household other than the family head or spouse, who is under 18 years of age.

Mixed family. A family whose members include those with citizenship or eligible immigration status, and those without citizenship or eligible immigration status.

Monthly adjusted income. One twelfth of adjusted income.

Monthly income. One twelfth of annual income.

Mutual housing. Included in the definition of *cooperative*.

National. A person who owes permanent allegiance to the United States, for example, as a result of birth in a United States territory or possession.

Near-elderly family. A family whose head, spouse, or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62 living with one or more live-in aides.

Net family assets. (1) Net cash value after deducting reasonable costs that would be incurred in disposing of real property, savings, stocks, bonds, and other forms of capital investment, excluding interests in Indian trust land and excluding equity accounts in HUD homeownership programs. The value of necessary items of personal property such as furniture and automobiles shall be excluded.

- In cases where a trust fund has been established and the trust is not revocable by, or under the control of, any member of the family or household, the value of the trust fund will not be considered an asset so long as the fund continues to be held in trust. Any income distributed from the trust fund shall be counted when determining annual income under §5.609.
- In determining net family assets, PHAs or owners, as applicable, shall include the value of any business or family assets disposed of by an applicant or tenant for less than fair market value (including a disposition in trust, but not in a foreclosure or bankruptcy sale) during the two years preceding the date of application for the program or reexamination, as applicable, in excess of the consideration received therefore. In the case of a disposition as part of a separation or divorce settlement, the disposition will not be considered to be for less than fair market value if the applicant or tenant receives important consideration not measurable in dollar terms.

Noncitizen. A person who is neither a citizen nor national of the United States.

Notice of funding availability (NOFA). For budget authority that HUD distributes by competitive process, the *Federal Register* document that invites applications for funding. This document explains how to apply for assistance and the criteria for awarding the funding.

Office of General Counsel (OGC). The General Counsel of HUD.

Owner. Any person or entity with the legal right to lease or sublease a unit to a participant.

PHA Plan. The annual plan and the 5-year plan as adopted by the PHA and approved by HUD.

PHA's quality control sample. An annual sample of files or records drawn in an unbiased manner and reviewed by a PHA supervisor (or by another qualified person other than the

person who performed the original work) to determine if the work documented in the files or records conforms to program requirements. For minimum sample size see CFR 985.3.

Participant (participant family). A family that has been admitted to the PHA program and is currently assisted in the program. The family becomes a participant on the effective date of the first HAP contract executed by the PHA for the family (first day of initial lease term).

Payment standard. The maximum monthly assistance payment for a family assisted in the voucher program (before deducting the total tenant payment by the family).

Person with disabilities. For the purposes of program eligibility. A person who has a disability as defined under the Social Security Act or Developmental Disabilities Care Act, or a person who has a physical or mental impairment expected to be of long and indefinite duration and whose ability to live independently is substantially impeded by that impairment but could be improved by more suitable housing conditions. This includes persons with AIDS or conditions arising from AIDS but excludes persons whose disability is based solely on drug or alcohol dependence. **For the purposes of reasonable accommodation.** A person with a physical or mental impairment that substantially limits one or more major life activities, a person regarded as having such an impairment, or a person with a record of such an impairment.

Portability. Renting a dwelling unit with a Section 8 housing choice voucher outside the jurisdiction of the initial PHA.

Premises. The building or complex in which the dwelling unit is located, including common areas and grounds.

Previously unemployed. With regard to the earned income disallowance, a person with disabilities who has earned, in the 12 months previous to employment, no more than would be received for 10 hours of work per week for 50 weeks at the established minimum wage.

Private space. In shared housing, the portion of a contract unit that is for the exclusive use of an assisted family.

Processing entity. The person or entity that, under any of the programs covered, is responsible for making eligibility and related determinations and any income reexamination. In the HCV program, the “processing entity” is the “responsible entity.”

Project owner. The person or entity that owns the housing project containing the assisted dwelling unit.

Public assistance. Welfare or other payments to families or individuals, based on need, which are made under programs funded, separately or jointly, by federal, state, or local governments.

Public housing agency (PHA). Any State, county, municipality, or other governmental entity or public body, or agency or instrumentality of these entities, that is authorized to engage or assist in the development or operation of low-income housing under the 1937 Act.

Qualified family (under the earned income disallowance). A family participating in an applicable assisted housing program or receiving HCV assistance:

- Whose annual income increases as a result of employment of a family member who is a person with disabilities and who was previously unemployed for one or more years prior to employment;
- Whose annual income increases as a result of increased earnings by a family member who is a person with disabilities during participation in any economic self-sufficiency or other job training program; or
- Whose annual income increases, as a result of new employment or increased earnings of a family member who is a person with disabilities, during or within six months after receiving assistance, benefits or services under any state program for temporary assistance for needy families funded under Part A of Title IV of the Social Security Act, as determined by the responsible entity in consultation with the local agencies administering temporary assistance for needy families (TANF) and Welfare-to-Work (WTW) programs. The TANF program is not limited to monthly income maintenance, but also includes such benefits and services as one-time payments, wage subsidies and transportation assistance--provided that the total amount over a six-month period is at least \$500.

Qualified census tract. With regard to certain tax credit units, any census tract (or equivalent geographic area defined by the Bureau of the Census) in which at least 50 percent of households have an income of less than 60 percent of Area Median Gross Income (AMGI), or where the poverty rate is at least 25 percent, and where the census tract is designated as a qualified census tract by HUD.

Reasonable rent. A rent to owner that is not more than rent charged: (1) For comparable units in the private unassisted market; and (2) For comparable unassisted units in the premises.

Reasonable accommodation. A change, exception, or adjustment to a rule, policy, practice, or service to allow a person with disabilities to fully access the PHA's programs or services.

Receiving PHA. In portability: A PHA that receives a family selected for participation in the tenant-based program of another PHA. The receiving PHA issues a voucher and provides program assistance to the family.

Recertification. Sometimes called *reexamination*. The process of securing documentation of total family income used to determine the rent the tenant will pay for the next 12 months if there are no additional changes to be reported.

Remaining member of the tenant family. The person left in assisted housing who may or may not normally qualify for assistance on their own circumstances (i.e., an elderly spouse dies, leaving widow age 47 who is not disabled).

Rent to owner. The total monthly rent payable to the owner under the lease for the unit (also known as contract rent). Rent to owner covers payment for any housing services, maintenance, and utilities that the owner is required to provide and pay for.

Residency preference. A PHA preference for admission of families that reside anywhere in a specified area, including families with a member who works or has been hired to work in the area (See *residency preference area*).

Residency preference area. The specified area where families must reside to qualify for a residency preference.

Responsible entity. For the public housing and the Section 8 tenant-based assistance, project-based certificate assistance, and moderate rehabilitation programs, the responsible entity means the PHA administering the program under an ACC with HUD. For all other Section 8 programs, the responsible entity means the Section 8 owner.

Secretary. The Secretary of Housing and Urban Development.

Section 8. Section 8 of the United States Housing Act of 1937.

Section 8 covered programs. All HUD programs which assist housing under Section 8 of the 1937 Act, including Section 8 assisted housing for which loans are made under Section 202 of the Housing Act of 1959.

Section 214. Section 214 of the Housing and Community Development Act of 1980, as amended.

Section 214 covered programs. The collective term for the HUD programs to which the restrictions imposed by Section 214 apply. These programs are set forth in 24 CFR 5.500.

Security deposit. A dollar amount (maximum set according to the regulations) which can be used for unpaid rent or damages to the owner upon termination of the lease.

Set-up charges. In a manufactured home space rental, charges payable by the family for assembling, skirting, and anchoring the manufactured home.

Shared housing. A unit occupied by two or more families. The unit consists of both common space for shared use by the occupants of the unit and separate private space for each assisted family. (A special housing type: see 24 CFR 982.615–982.618.)

Single Person. A person living alone or intending to live alone.

Single room occupancy housing (SRO). A unit that contains no sanitary facilities or food preparation facilities, or contains either, but not both, types of facilities. (A special housing type: see 24 CFR 982.602–982.605.)

Social security number (SSN). The nine-digit number that is assigned to a person by the Social Security Administration and that identifies the record of the person's earnings reported to the Social Security Administration. The term does not include a number with a letter as a suffix that is used to identify an auxiliary beneficiary.

Special admission. Admission of an applicant that is not on the PHA waiting list or without considering the applicant's waiting list position.

Special housing types. See subpart M of part 982. Subpart M states the special regulatory requirements for: SRO housing, congregate housing, group homes, shared housing, cooperatives (including mutual housing), and manufactured homes (including manufactured home space rental).

Specified welfare benefit reduction. Those reductions of welfare benefits (for a covered family) that may not result in a reduction of the family rental contribution. A reduction of welfare benefits because of fraud in connection with the welfare program, or because of welfare sanction due to noncompliance with a welfare agency requirement to participate in an economic self-sufficiency program.

Spouse. The marriage partner of the head of household.

Stalking. To follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate; or to place under surveillance with the intent to kill, injure, harass, or intimidate another person; and in the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to (1) that person, (2) a member of the immediate family of that person, or (3) the spouse or intimate partner of that person.

State wage information collection agency (SWICA). The state agency, including any Indian tribal agency, receiving quarterly wage reports from employers in the state, or an alternative system that has been determined by the Secretary of Labor to be as effective and timely in providing employment-related income and eligibility information.

Subsidy standards. Standards established by a PHA to determine the appropriate number of bedrooms and amount of subsidy for families of different sizes and compositions.

Suspension. Stopping the clock on the term of a family's voucher after the family submits a request for tenancy approval. If the PHA decides to allow extensions or suspensions of the voucher term, the PHA administrative plan must describe how the PHA determines whether to grant extensions or suspensions, and how the PHA determines the length of any extension or suspension. This practice is also called *tolling*.

Tax credit rent. With regard to certain tax credit units, the rent charged for comparable units of the same bedroom size in the building that also receive the low-income housing tax credit but do not have any additional rental assistance (e.g., tenant-based voucher assistance).

Tenancy addendum. For the housing choice voucher program, the lease language required by HUD in the lease between the tenant and the owner.

Tenant. The person or persons (other than a live-in aide) who executes the lease as lessee of the dwelling unit.

Tenant rent to owner. See *family rent to owner*.

Term of lease. The amount of time a tenant agrees in writing to live in a dwelling unit.

Total tenant payment (TTP). The total amount the HUD rent formula requires the tenant to pay toward rent and utilities.

Unit. Residential space for the private use of a family. The size of a unit is based on the number of bedrooms contained within the unit and generally ranges from zero (0) bedrooms to six (6) bedrooms.

Utility allowance. If the cost of utilities (except telephone) and other housing services for an assisted unit is not included in the tenant rent but is the responsibility of the family occupying the unit, an amount equal to the estimate made or approved by a PHA or HUD of the monthly cost of a reasonable consumption of such utilities and other services for the unit by an energy-conservative household of modest circumstances consistent with the requirements of a safe, sanitary, and healthful living environment.

Utility reimbursement. In the voucher program, the portion of the housing assistance payment which exceeds the amount of rent to owner.

Utility hook-up charge. In a manufactured home space rental: Costs payable by a family for connecting the manufactured home to utilities such as water, gas, electrical and sewer lines.

Very low-income family. A low-income family whose annual income does not exceed 50 percent of the median income for the area, as determined by HUD, with adjustments for smaller and larger families. HUD may establish income limits higher or lower than 50 percent of the median income for the area on the basis of its finding that such variations are necessary because of unusually high or low family incomes. This is the income limit for the housing choice voucher program.

Violent criminal activity. Any illegal criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force against the person or property of another.

Voucher (housing choice voucher). A document issued by a PHA to a family selected for admission to the housing choice voucher program. This document describes the program and the procedures for PHA approval of a unit selected by the family. The voucher also states obligations of the family under the program.

Voucher holder. A family holding a voucher with an unexpired term (search time).

Voucher program. The housing choice voucher program.

Waiting list admission. An admission from the PHA waiting list.

Welfare assistance. Income assistance from federal or state welfare programs, including assistance provided under TANF and general assistance. Does not include assistance directed solely to meeting housing expenses, nor programs that provide health care, child care or other services for working families. For the FSS program (984.103(b)), *welfare assistance* includes only cash maintenance payments from federal or state programs designed to meet a family's ongoing basic needs, but does not include food stamps, emergency rental and utilities assistance, SSI, SSDI, or social security.



**San Francisco Housing Authority Policy:
Limited English Proficiency Plan
Appendix A**

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1.0 Effective May 24, 2010; Policy Number 1

2.0 Purpose of the Policy & Plan Statement

The San Francisco Housing Authority (“SFHA”) has adopted this plan to provide meaningful access to its programs and activities by persons with Limited English Proficiency (“LEP”). In accordance with Federal guidelines, the SFHA will make reasonable efforts to provide or arrange free language assistance for its LEP clients, including applicants, recipients and/or persons eligible for public housing, Section 8/Housing Choice Vouchers, homeownership and other SFHA programs.

3.0 Detailed Policy Statement

3.1 Meaningful Access: Four Factor Analysis

Meaningful access is free language assistance in accordance with Federal guidelines. No less than every five (5) years, The SFHA will assess and update the following four-factor analysis, including but not limited to:

- 1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the SFHA;

- 2) The frequency with which with LEP persons using a particular language come into contact with the SFHA;
- 3) The nature and importance of the SFHA program, activity or service to the person's life;
- 4) The SFHA's resources and the cost of providing meaningful access. Reasonable steps may cease to be reasonable where the costs imposed substantially exceed the benefits.

RACE	Total	Percentage	
WHITE	338,466	44.68%	
BLACK	50,750	6.70%	
AMERICAN INDIAN	1,672	0.22%	
ASIAN	238,344	31.46%	
NATIVE HAWAIIAN AND OTHER PACIFIC ISLANDER	3,228	0.43%	
HISPANIC	105,790	13.96%	
OTHER	19,354	2.55%	
	757,604	100.00%	3.1.1 Factor <u>One</u>

The number or proportion of LEP persons eligible to be served or likely to be encountered by the SFHA: This determination will be made based on U.S. Census Bureau data and language preference data compiled by SFHA. The U.S. Census Bureau's American Fact Finder for the County of San Francisco, provides the following statistics for the 757,064 total population:

The SFHA language preference data compiled based on reports generated from the SFHA PHAMS client file computer system, produced the following statistics on clients we currently serve:

LANGAUGE	total	percentage
N/A	678	1.22%
CAMBODIAN	134	0.24%
CANTONESE	12780	22.91%
ENGLISH	29939	53.67%
FARSI	66	0.12%
KOREAN	324	0.58%
LAOTIAN	39	0.07%
MANDARIN	878	1.57%
RUSSIAN	2958	5.30%
SAMOAN	272	0.49%
SPANISH	3715	6.66%
TAGOLOG	721	1.29%
VIETNAMESE	3283	5.88%

55787 100.00%

A determination as to whether 5 percent of the SFHA clientele speaks a specific language will trigger consideration of vital document translation.

3.1.2 Factor Two

The frequency with which with LEP persons using a particular language come into contact with the SFHA: This determination will be made based on the reports generated from sign-in sheets at SFHA offices. These sign-in sheets track the frequency and types of language assistance requested by SFHA clients.

3.1.3 Factor Three

The nature and importance of the SFHA program, activity or service to the person's life: SFHA adheres to the philosophy that housing is essential and extremely important. Thus, when a staff member engages a client in a discussion involving the client's rights to benefits, programs or services offered by the SFHA, the staff

member must determine whether failure to provide language assistance would result in a substantial delay that would adversely affect the client's rights.

3.1.4 Factor Four

The SFHA's resources and the cost of providing meaningful access: The SFHA will utilize a combination of procured vendors and SFHA multi-lingual staff members as professional, competent translators and interpreters. SFHA will procure qualified vendors to provide written translations of vital documents, as well as oral interpretation for languages not spoken by SFHA staff members. SFHA staff members who agree to serve as trained oral interpreters will receive additional compensation for demonstrating proficiency in multiple languages, participating in interpreter/cultural competency training, and serving as oral interpreters.

Additionally, SFHA will establish partnerships with city departments/agencies and community organizations to provide volunteer interpreter services for our clients, as an alternative when professional interpreters (procured vendors and SFHA staff members) are unavailable. As a last resort, SFHA will allow clients to waive their right to professional and/or volunteer language services, so that clients may utilize friends or family members (who are not minors) as oral interpreters.

3.2 Language Assistance

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient (LEP) person and may be entitled to language assistance with respect to SFHA programs and activities.

SFHA staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English. The staff will use the LEP Language Chart to identify the language spoken/written by the applicants/participants. Staff will also use the Personal Declaration form at every admission and re-certification to update the translation/interpretation services needed for each household.

The SFHA will assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of clients. The SFHA will track client requests for language assistance using sign-in sheets at SFHA office

locations. The SFHA will track clients' identified language preferences using the SFHA PHAMS computer system.

The SFHA will distinguish between language assistance provided in the form of 1) written translations, and 2) oral interpretations.

3.2.1 Written Translations

The SFHA will weigh the costs and benefits of translating documents for potential LEP groups, considering the expense of translating the documents, the barriers to meaningful translation or interpretation of technical housing information, the likelihood of frequent changes in documents, the existence of multiple dialects within a single language group, and other relevant factors. The SFHA will undertake this examination when an eligible LEP group constitutes five percent of an eligible client group.

Based on the Four-Factor analysis, SFHA translates vital documents to Chinese (Cantonese), Russian, Spanish and Vietnamese. Vital documents are listed in the LEP Plan Procedure.

A client may request oral interpretations of the above documents into languages not listed above. A client may also request oral interpretations of documents not translated.

As opportunities arise, the SFHA may work with other housing authorities to share the costs of translating common documents, which may include language groups, which currently do not reach the threshold level in the SFHA's client population.

The SFHA will require a client to certify that the client understood the document translated with the Translation Certification Document.

The SFHA staff member will also explain to the client that any written translations of SFHA or HUD forms are not the official/legal version of the form. Vital document translations are used for the sole purpose of helping the LEP client understand the contents of the document. When a staff member uses a vital document translation to help a client understand a document, the client will only sign documents and forms in the English version.

3.2.2 Oral Interpretations

The SFHA will provide interpreters, including multi-lingual staff and procured vendors at important stages, including, but not limited to Initial Eligibility, Re-Certification and Formal/Informal Hearings. written translation and verbal interpretation services will be provided consistent with the four-factor analysis detailed above.

In cases of Formal/Informal Hearings an SFHA staff interpreter may not be a subordinate to the SFHA staff member rendering a decision on the client's hearing.

The SFHA will require a client to certify that the client understood the matter communicated and/or document interpreted with the Translation Certification Document and/or Interpretation Certification Document.

After the SFHA has offered free interpreter services, if an LEP client prefers to use an informal interpreter, such as a friend or family member (who is not a minor), the informal interpreter may interpret. In these cases the client and interpreter of choice will sign a waiver of free interpreter services.

4.0 Applicability

This policy applies to all management and staff of the SFHA. Failure to comply with this policy can result in termination of employment.

5.0 Cognizant Offices / Getting Help

Questions about this policy should be addressed to the LEP Manager.

6.0 Implementation Procedures

The implementation procedures for this policy are the LEP Plan Procedure, which may be provided upon request to the San Francisco Housing Authority.

Attachment IV

Fiscal Audit

**HOUSING AUTHORITY
OF THE CITY AND
COUNTY OF SAN
FRANCISCO,
CALIFORNIA**

**Basic
Financial Statements and
Supplemental Information**

**Year ended
September 30, 2010**

**BERMAN HOPKINS
WRIGHT & LAHAM**
CPAs AND ASSOCIATES, LLP

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INDEPENDENT AUDITORS' REPORT

Board of Commissioners
Housing Authority of the City and County of San Francisco, California
San Francisco, California

We have audited the accompanying financial statements of the business-type activities and the aggregate discretely presented component units of the Housing Authority of the City and County of San Francisco, California (the "Authority"), as of and for the year ended September 30, 2010, which collectively comprise the Authority's basic financial statements as listed in the table of contents. These financial statements are the responsibility of the Authority's management. Our responsibility is to express opinions on these financial statements based on our audit. We did not audit the following discretely presented component units: Plaza East Associates, L.P., Hayes Valley Apartments L.P., Hayes Valley Apartments II, L.P., and Bernal Housing Associates, L.P., which together represent 100% of the total assets and revenues of the aggregate discretely presented component units. Those financial statements were audited by other auditors whose reports have been furnished to us, and our opinion, insofar as it relates to the amounts included for Plaza East Associates, L.P., Hayes Valley Apartments L.P., Hayes Valley Apartments II, L.P., and Bernal Housing Associates, L.P., is based solely on the reports of the other auditors.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. The financial statements of Plaza East Associates, L.P., Hayes Valley Apartments L.P., Hayes Valley Apartments II, L.P., and Bernal Housing Associates, L.P., were not audited in accordance with *Government Auditing Standards*. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit and the reports of the other auditors provide a reasonable basis for our opinions.

In our opinion, based on our audit and the reports of the other auditors, the financial statements referred to above present fairly, in all material respects, the respective financial position of the business-type activities and the aggregate discretely presented component units of the Authority as of September 30, 2010, and the respective changes in financial position, and cash flows, where applicable, thereof for the year then ended in conformity with accounting principles generally accepted in the United States of America.

In accordance with *Government Auditing Standards*, we have also issued our report dated June 29, 2011 on our consideration of the Authority's internal control over financial reporting and our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* and should be considered in assessing the results of our audit.

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis, and schedule of pension and other post employment benefits, as listed in the table of contents, be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board, who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide assurance.

Our audit was conducted for the purpose of forming opinions on the financial statements that collectively comprise the Authority's financial statements as a whole. The accompanying financial data schedule and schedules of actual program costs and advances are presented for purposes of additional analysis as required by the U.S. Department of Housing and Urban Development, and are not a required part of the financial statements of the Authority. The accompanying schedule of expenditures of federal awards and local assistance is presented for purposes of additional analysis as required by the U.S. Office of Management and Budget Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*, and is also not a required part of the financial statements of the Authority. The information is the responsibility of management and is derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the information is fairly stated, in all material respects, in relation to the financial statements taken as a whole.

June 29, 2011
Melbourne, Florida

Berman Hopkins Wright & LaHam
CPAs and Associates, LLP

The Housing Authority of the City and County of San Francisco, California

Management's Discussion and Analysis

For the Year Ended September 30, 2010

The Housing Authority of the City and County of San Francisco, California (the "Authority") management's discussion and analysis report is designed to (a) assist the reader in focusing on significant financial issues, (b) provide an overview of the Authority's financial activity, (c) identify changes in the Authority's financial position (its ability to address the next and subsequent year challenges), and (d) identify individual program issues or concerns.

This financial report is designed to provide an overview of the Authority's total financial picture for the fiscal year ending September 30, 2010, for those with an interest. Questions concerning any of the information provided in this report or requests for additional information should be addressed to the Finance Department, San Francisco Housing Authority, 1815 Egbert Avenue San Francisco, California 94124.

Financial Highlights

- The Authority's net assets increased by \$7,626,166 or 4.1% during the fiscal year.
- The Authority's operating revenue increased by \$21,452,209 or 11.9% during the fiscal year.
- The Authority's operating expenses increased by \$14,991,820 or 7.9% during the fiscal year.
- At the close of the current fiscal year, the Authority's assets exceeded its liabilities by \$192,335,272.

Overview of the Financial Statements

The financial statements included in this annual report are those of a special-purpose government agency engaged in a single business-type activity prepared on an accrual basis. Over time, significant changes in the Authority's net assets serve as a useful indicator of whether its financial health is improving or deteriorating. To fully assess the financial health of any authority, the reader must also consider other non-financial factors such as changes in family composition, fluctuations in the local economy, Department of Housing and Urban Development mandated program administrative changes, and the physical condition of capital assets.

Overview of the Financial Statements (continued)

The following statements are included:

- **Balance Sheet** - this statement reports the Authority's assets, liabilities and net assets at the end of the fiscal year. You can think of the Authority's net assets as the difference between what the Authority owns (assets) and what the Authority owes (liabilities).
- **Statement of Revenues, Expenses, and Changes in Net Assets** - this statement presents information showing how the Authority's net assets increased or decreased during the current fiscal year. All changes in net assets are reported as soon as the underlying event giving rise to the change occurs, regardless of when the cash is received or paid. Thus, revenues and expenses are reported in this statement for some items that will result in cash inflows and cash outflows in future periods.
- **Statement of Cash Flows** - this statement presents information showing the total cash receipts and cash disbursements of the Authority during the current fiscal year. The statement reflects the net changes in cash resulting from operations plus any other cash requirements during the current year (i.e. capital additions, debt service, prior period obligations, etc.). In addition, the statement reflects the receipt of cash that was obligated to the Authority in prior periods and subsequently received during the current fiscal year (i.e. accounts receivable).
- **Notes to the Basic Financial Statements** - notes to the basic financial statements provide additional information that is essential to a full understanding of the data provided. These notes provide greater understanding on the overall activity of the Authority and how values are assigned to certain assets and liabilities and the longevity of these values. In addition, the notes reflect the impact (if any) of any uncertainties the Authority may face.

In addition to the basic financial statements listed above, our report includes supplemental information. This information provides additional detail on the Authority's various programs and the required information mandated by regulatory bodies that fund the Authority's various programs.

Financial Analysis

Balance Sheet

	2010	2009 restated	Total Change
Current assets	\$ 30,826,357	\$ 31,207,057	\$ (380,700)
Capital assets, net	87,256,115	77,768,970	9,487,145
Other noncurrent assets, net	104,959,616	105,268,111	(308,495)
Total assets	<u>\$ 223,042,088</u>	<u>\$ 214,244,138</u>	<u>\$ 8,797,950</u>
Current liabilities	\$ 13,308,876	\$ 12,685,182	\$ 623,694
Noncurrent liabilities	17,397,940	16,849,850	548,090
Total liabilities	<u>30,706,816</u>	<u>29,535,032</u>	<u>1,171,784</u>
Invested in capital assets, net of related debt	87,256,115	77,768,970	9,487,145
Restricted net assets	114,338,344	13,324,726	101,013,618
Unrestricted net assets	<u>(9,259,187)</u>	<u>93,615,410</u>	<u>(102,874,597)</u>
Total net assets	<u>192,335,272</u>	<u>184,709,106</u>	<u>7,626,166</u>
Total liabilities and net assets	<u>\$ 223,042,088</u>	<u>\$ 214,244,138</u>	<u>\$ 8,797,950</u>

Current Assets decreased by \$380,700 primarily due to a reduction in cash of \$1,800,000 offset by increases in receivables of \$1,500,000. The decrease in cash was largely attributable to the cost of operations being greater than the subsidy received.

Net Capital Assets had an increase of \$9,487,145. This increase is a result of capital improvements undertaken by the Authority and administrative equipment purchases, offset by the current depreciation expense.

Other Noncurrent Assets decreased by \$308,495 primarily due to payments collected on the note receivable.

Net Assets are the difference between an organization's assets and its liabilities is its net assets. Net assets are categorized as one of three types.

- Invested in capital assets, net of related debt - capital assets, net of accumulated depreciation and related debt is due to the capital asset and long-term debt activity.
- Restricted - the Authority's net assets whose use is subject to constraints imposed by law or agreement. The increase of \$101,013,618 in restricted net assets is primarily attributable to the reclassification in the current year of the net assets in the HOPE VI program consisting of the notes receivable, investment in joint ventures and accrued interest receivable, which were presented as unrestricted net assets in prior years.
- Unrestricted - the Authority's net assets that are neither invested in capital assets nor restricted, which change principally due to operations. These resources are available to meet the Authority's ongoing obligations to its residents and creditors.

Financial Analysis (continued)

Statement of Revenues, Expenses and Change in Net Assets			
	2010	2009 restated	Net Change
Operating revenues			
HUD revenue	\$ 173,786,226	\$ 149,109,905	\$ 24,676,321
Other government grants	10,097,402	12,323,655	(2,226,253)
Tenant revenue, net	15,588,231	16,817,617	(1,229,386)
Other operating revenue	1,677,170	1,445,643	231,527
Total operating revenues	<u>201,149,029</u>	<u>179,696,820</u>	<u>21,452,209</u>
Operating expenses			
Administrative	19,924,181	19,237,100	687,081
Tenant services	1,351,425	1,308,629	42,796
Utilities	12,060,208	11,838,613	221,595
Maintenance	26,654,007	23,233,019	3,420,988
Protective services	3,234,150	2,520,163	713,987
General	6,487,147	4,341,964	2,145,183
Depreciation	5,307,915	4,049,188	1,258,727
Housing assistance payments	129,902,320	123,400,857	6,501,463
Total operating expenses	<u>204,921,353</u>	<u>189,929,533</u>	<u>14,991,820</u>
Operating income (loss)	(3,772,324)	(10,232,713)	6,460,389
Nonoperating revenues (expenses)			
Interest income	906,373	855,010	51,363
Other	-	327,895	(327,895)
Total nonoperating revenues	<u>906,373</u>	<u>1,182,905</u>	<u>(276,532)</u>
Changes in net assets before capital contributions	(2,865,951)	(9,049,808)	6,183,857
Contributions and distributions			
HUD capital grants	13,111,115	16,553,478	(3,442,363)
Transfers to component unit	(2,618,998)	(2,549,853)	(69,145)
Change in net assets	7,626,166	4,953,817	2,672,349
Total net assets - beginning	184,709,106	182,053,469	2,655,637
Prior period adjustment	-	(2,298,180)	2,298,180
Total net assets - ending	<u>\$ 192,335,272</u>	<u>\$ 184,709,106</u>	<u>\$ 7,626,166</u>

Total Operating Revenues increased by \$21,452,209 for the 2010 fiscal year. This increase of operating revenue is due primarily to increases in HUD operating grants, HUD ARRA (Stimulus), administrative fee grants, and grants from the City and County of San Francisco.

Operating Expenses are categorized by the Authority as administrative, tenant services, utilities, maintenance, protective services, general, depreciation and housing assistance payments. The increase of \$14,991,820 in total operating expenses is primarily attributable to the increase in housing assistance payments of \$6,501,463 due to an increase in lease-up, an increase in maintenance expense to improve physical conditions of the development by \$3,420,988 and an increase in general expenses of \$2,145,183 for the 2010 fiscal year.

Financial Analysis (continued)

Nonoperating Revenues (Expenses) decreased by \$276,532 mainly due to the effect of the gain on disposal of capital assets in 2009 fiscal year offset by increases in interest income.

CAPITAL ASSETS

The Authority's capital assets as of September 30, 2010, amounts to \$87,256,115 (net of accumulated depreciation). The investment in capital assets includes land, buildings and improvements, furniture and equipment, construction in progress, and accumulated depreciation. The total increase in the Authority's capital assets for the current fiscal year was \$12,845,693, as a result of construction in progress and administrative equipment, offset by the depreciation expense.

	<u>2010</u>	<u>2009</u>	<u>Total Change</u>
Land	\$ 11,678,889	\$ 8,320,341	\$ 3,358,548
Buildings and improvements	148,212,816	134,465,133	13,747,683
Furniture, equipment, and machinery	8,064,417	7,655,185	409,232
Construction in progress	2,681,822	2,043,677	638,145
Accumulated depreciation	(83,381,829)	(78,073,914)	(5,307,915)
Total	<u>\$ 87,256,115</u>	<u>\$ 74,410,422</u>	<u>\$ 12,845,693</u>

LONG-TERM DEBT

At September 30, 2010, the Authority's noncurrent liabilities consisted principally of \$8,070,000 of Multifamily Housing Revenue Refunding Bonds that were issued to finance the Valencia Gardens development, deferred revenue on a long term lease of \$4,959,165, accrued compensated absences of \$1,727,087, and a deposit received for the Shelter Plus Care program of \$300,000. The only noncurrent liability that had a significant change in the year ending September 30, 2010 was the other postemployment benefits liability of \$2,341,688, which increased \$838,287 during the year.

ECONOMIC FACTORS

It is expected that the factors listed below will affect the financial condition of the Authority for the fiscal year ending September 30, 2011 and beyond:

- During fiscal year ended September 30, 2010, HUD provided 103% funding level for the public housing operating subsidy. HUD indicated a funding level of 95.6% for the fiscal year ending September 30, 2011 and coupled with the reduction of \$1.4 million as a result of failing the "Stop Loss" provisions, operating subsidy is expected to decrease by about \$2.6 million.
- The Authority is a "decliner" agency under the Operating Fund Rule currently being implemented. The Authority did not pass Year 1 and Year 2 of the "Stop Loss" provisions of the rule which resulted in operating subsidy loss of \$6 million up to fiscal year ending September 30, 2011. Currently, the Authority submitted its data for Year 3 "Stop Loss" and is awaiting result of HUD's review. The Authority could experience a more significant reduction in operating subsidy if it continues to fail this provision of the rule.

ECONOMIC FACTORS (continued)

- There isn't expected to be any significant reduction of funding in the Capital Fund program from fiscal year 2010 to fiscal year 2011; however, we expect to have a 20% reduction in funding level for fiscal year 2012.
- The funding for the Section 8 program reduced by 11% in administrative fee and 1% in housing assistance payments subsidy from fiscal year 2010 to fiscal year 2011.
- The Authority was awarded an additional \$15.3 million grant under the American Recovery and Reinvestment Act of 2009 Competitive Grant program (ARRA). The entire grant of \$33.2 million in ARRA funding was used to modernize existing housing stocks during the fiscal years ending September 30, 2010 and 2011.
- The Authority terminated its contract with the San Francisco Department of Human Services for the administration of its Shelter Plus Care program effective July 1, 2011. This will result in a loss of administrative fee income of approximately \$500,000 per year.

The Housing Authority of the City and County of San Francisco, California

BALANCE SHEET

September 30, 2010

ASSETS

	Total Primary Government	Total Discrete Component Units (December 31, 2009)
CURRENT ASSETS		
Cash and cash equivalents - unrestricted	\$ 1,719,095	\$ 191,846
Cash and cash equivalents - restricted	13,450,027	2,462,365
Receivables, net	2,028,330	1,030,333
Due from HUD	7,155,155	-
Due from other governments	1,852,996	-
Prepaid expenses	80,884	93,777
Accrued interest receivable, net	4,539,870	-
Total current assets	<u>30,826,357</u>	<u>3,778,321</u>
NONCURRENT ASSETS		
Capital assets, net	87,256,115	65,262,020
Investment in joint venture	28,570,728	-
Notes, loans and mortgages receivable	76,387,383	-
Other noncurrent assets	1,505	1,706,541
Total assets	<u>\$ 223,042,088</u>	<u>\$ 70,746,882</u>

LIABILITIES AND NET ASSETS

CURRENT LIABILITIES		
Current portion of long-term debt	\$ 330,000	\$ 46,938
Accounts payable	4,096,452	442,097
Due to HUD	1,776,765	-
Accrued interest payable	-	20,920
Accrued salaries and benefits	591,119	-
Accrued liabilities	653,037	-
Tenant security deposits	1,201,625	271,773
Deferred revenue - HUD subsidy	2,424,475	51,223
FSS escrow	966,635	-
Other current liabilities	1,268,768	129,896
Total current liabilities	<u>13,308,876</u>	<u>962,847</u>
NONCURRENT LIABILITIES		
Accrued compensated absences	1,727,087	-
Deferred revenue - lease	4,959,165	-
Long-term debt	8,070,000	48,492,593
Other noncurrent liabilities	300,000	528,635
Other post-employment benefits ("OPEB") liability	2,341,688	-
Total liabilities	<u>30,706,816</u>	<u>49,984,075</u>
NET ASSETS		
Invested in capital assets, net of related debt	87,256,115	16,722,489
Restricted net assets	114,338,344	2,190,592
Unrestricted net assets	(9,259,187)	1,849,726
Total net assets	<u>192,335,272</u>	<u>20,762,807</u>
Total liabilities and net assets	<u>\$ 223,042,088</u>	<u>\$ 70,746,882</u>

The accompanying notes are an integral part of this financial statement.

The Housing Authority of the City and County of San Francisco, California

STATEMENT OF REVENUES, EXPENSES AND CHANGES IN NET ASSETS

Year ended September 30, 2010

	Total Primary Government	Total Discrete Component Units (December 31, 2009)
OPERATING REVENUES		
HUD operating revenues	\$ 173,786,226	\$ -
Other government operating grants	10,097,402	-
Tenant revenue, net	15,588,231	2,611,785
Other operating revenue	1,677,170	109,196
Total operating revenues	<u>201,149,029</u>	<u>2,720,981</u>
OPERATING EXPENSES		
Administrative	19,924,181	1,383,867
Tenant services	1,351,425	-
Utilities	12,060,208	853,662
Maintenance	26,654,007	2,438,200
Protective services	3,234,150	291,076
General	6,487,147	434,166
Depreciation	5,307,915	2,500,546
Housing assistance payments	129,902,320	-
Total operating expenses	<u>204,921,353</u>	<u>7,901,517</u>
OPERATING INCOME (LOSS)	<u>(3,772,324)</u>	<u>(5,180,536)</u>
NONOPERATING REVENUES (EXPENSES)		
Mortgage interest income, net	626,517	-
Interest income - unrestricted	252,245	13,163
Interest income - restricted	27,611	-
Interest expense	-	(1,072,455)
Total nonoperating revenues (expenses)	<u>906,373</u>	<u>(1,059,292)</u>
Change in net assets before capital contributions and transfers	(2,865,951)	(6,239,828)
CAPITAL AND PARTNER CONTRIBUTIONS AND TRANSFERS		
HUD capital grants	13,111,115	-
Partner contributions	-	550,000
Transfers from primary government	-	2,661,437
Transfers to component unit	(2,618,998)	-
Change in net assets	<u>7,626,166</u>	<u>(3,028,391)</u>
Total net assets - beginning	<u>184,709,106</u>	<u>23,791,198</u>
Total net assets - ending	<u>\$ 192,335,272</u>	<u>\$ 20,762,807</u>

The accompanying notes are an integral part of this financial statement.

The Housing Authority of the City and County of San Francisco, California

STATEMENT OF CASH FLOWS

Year ended September 30, 2010

CASH FLOWS FROM OPERATING ACTIVITIES

HUD operating grants received	\$ 178,053,784
Other government grants received	8,395,721
Collections from tenants	15,520,195
Collections from other sources	1,512,693
Payments to employees	(34,787,471)
Payments to suppliers	(36,659,396)
Housing assistance payments	(129,930,612)
Net cash provided by operating activities	<u>2,104,914</u>

CASH FLOWS FROM CAPITAL AND RELATED FINANCING ACTIVITIES

HUD capital grants received	13,111,115
Collections of accrued interest	100,000
Collections on note receivable	310,000
Payments on long-term debt	(310,000)
Transfers to component units	(2,618,998)
Purchase of property and equipment	(14,795,060)
Net cash used in capital and related financing activities	<u>(4,202,943)</u>

CASH FLOWS FROM INVESTING ACTIVITIES

Interest received - unrestricted	252,247
Interest received - restricted	27,611
Net cash provided by investing activities	<u>279,858</u>

NET DECREASE IN CASH

	(1,818,171)
Cash and cash equivalents at beginning of year	<u>16,987,293</u>
Cash and cash equivalents at end of year	<u>\$ 15,169,122</u>

AS PRESENTED IN THE ACCOMPANYING BALANCE SHEET:

Cash and cash equivalents - unrestricted	\$ 1,719,095
Cash and cash equivalents - restricted	<u>13,450,027</u>
	<u>\$ 15,169,122</u>

The accompanying notes are an integral part of this financial statement.

The Housing Authority of the City and County of San Francisco, California

STATEMENT OF CASH FLOWS (continued)

Year ended September 30, 2010

RECONCILIATION OF OPERATING LOSS TO NET CASH PROVIDED BY OPERATING ACTIVITIES	
Operating loss	\$ (560,887)
Adjustments to reconcile operating loss to net cash provided by operating activities	
Depreciation	5,307,915
Provision for bad debt, net of recoveries	1,815,708
(Increase) decrease in assets:	
Receivables, net	(2,067,580)
Due from HUD	990,734
Due from other governments	(1,701,681)
Prepaid expenses	51,864
Other noncurrent assets	(1,505)
Increase (decrease) in liabilities:	
Accounts payable	(1,415,473)
Due to HUD	852,349
Accrued salaries and benefits	(1,568,454)
Accrued liabilities	(441)
Tenant security deposits	19,359
Deferred revenue	2,424,475
FSS escrow	(28,292)
Other current liabilities	359,973
Other post-employment benefits ("OPEB") liability	838,287
Net cash provided by operating activities	<u>\$ 5,316,351</u>

The accompanying notes are an integral part of this financial statement.

The Housing Authority of the City and County of San Francisco, California
COMBINING BALANCE SHEET FOR DISCRETE COMPONENT UNITS

September 30, 2010

ASSETS	Discrete Component Units - As of December 31, 2009				Total Discrete Component Units
	Bernal Housing Associates, L.P.	Hayes Valley Apartments, L.P.	Hayes Valley Apartments II, L.P.	Plaza East Associates, L.P.	
CURRENT ASSETS					
Cash and cash equivalents - unrestricted	\$ 13,107	\$ 40,532	\$ 133,922	\$ 4,285	\$ 191,846
Cash and cash equivalents - restricted	497,254	818,902	956,902	189,307	2,462,365
Receivables, net	102,587	260,690	377,131	289,925	1,030,333
Prepaid expenses	21,728	20,279	22,481	29,289	93,777
Total current assets	634,676	1,140,403	1,490,436	512,806	3,778,321
NONCURRENT ASSETS					
Capital assets, net	23,048,158	5,683,677	10,087,864	26,442,321	65,262,020
Other noncurrent assets	33,752	111,550	373,723	1,187,516	1,706,541
Total assets	\$ 23,716,586	\$ 6,935,630	\$ 11,952,023	\$ 28,142,643	\$ 70,746,882
LIABILITIES AND NET ASSETS					
CURRENT LIABILITIES					
Current portion of long-term debt	\$ -	\$ 20,416	\$ 26,522	\$ -	\$ 46,938
Accounts payable	150,614	23,216	18,556	249,711	442,097
Accrued interest payable	-	8,545	12,375	-	20,920
Tenant security deposits	58,103	63,087	82,312	68,271	271,773
Deferred revenue	15,468	9,102	22,637	4,016	51,223
Other current liabilities	8,610	47,935	10,983	62,368	129,896
Total current liabilities	232,795	172,301	173,385	384,366	962,847
NONCURRENT LIABILITIES					
Long-term debt	20,201,045	4,436,206	7,806,992	16,048,350	48,492,593
Other noncurrent liabilities	-	304,909	21,926	201,800	528,635
Total liabilities	20,433,840	4,913,416	8,002,303	16,634,516	49,984,075
NET ASSETS					
Invested in capital assets, net of related debt	2,847,113	1,227,055	2,254,350	10,393,971	16,722,489
Restricted net assets	439,151	755,815	874,590	121,036	2,190,592
Unrestricted net assets	(3,518)	39,344	820,780	993,120	1,849,726
Total net assets	3,282,746	2,022,214	3,949,720	11,508,127	20,762,807
Total liabilities and net assets	\$ 23,716,586	\$ 6,935,630	\$ 11,952,023	\$ 28,142,643	\$ 70,746,882

The accompanying notes are an integral part of this financial statement.

The Housing Authority of the City and County of San Francisco, California

COMBINING STATEMENT OF REVENUES, EXPENSES AND CHANGES IN NET ASSETS
FOR DISCRETE COMPONENT UNITS

Year ended September 30, 2010

	Discrete Component Units - Year ended December 31, 2009				
	Bernal Housing Associates, L.P.	Hayes Valley Apartments, L.P.	Hayes Valley Apartments II, L.P.	Plaza East Associates, L.P.	Total Discrete Component Units
OPERATING REVENUES					
Tenant revenue, net	\$ 455,888	\$ 747,438	\$ 963,925	\$ 444,534	\$ 2,611,785
Other operating revenue	6,377	25,422	50,798	26,599	109,196
Total operating revenues	462,265	772,860	1,014,723	471,133	2,720,981
OPERATING EXPENSES					
Administrative	344,978	268,197	339,466	431,226	1,383,867
Utilities	207,097	153,017	165,646	327,902	853,662
Maintenance	856,370	360,493	686,861	534,476	2,438,200
Protective services	-	83,306	90,516	117,254	291,076
General	82,311	49,219	218,101	84,535	434,166
Depreciation	830,807	254,013	402,245	1,013,481	2,500,546
Total operating expenses	2,321,563	1,168,245	1,902,835	2,508,874	7,901,517
OPERATING INCOME (LOSS)	(1,859,298)	(395,385)	(888,112)	(2,037,741)	(5,180,536)
NONOPERATING REVENUES (EXPENSES)					
Interest income - unrestricted	736	5,852	6,268	307	13,163
Interest expense	(22,365)	(300,633)	(497,093)	(252,364)	(1,072,455)
Total nonoperating revenues (expenses)	(21,629)	(294,781)	(490,825)	(252,057)	(1,059,292)
Change in net assets before capital contributions and transfers	(1,880,927)	(690,166)	(1,378,937)	(2,289,798)	(6,239,828)
CAPITAL AND PARTNER CONTRIBUTIONS AND TRANSFERS					
Partner contributions	550,000	-	-	-	550,000
Transfers from primary government	944,431	320,382	410,884	985,740	2,661,437
Change in net assets	(386,496)	(369,784)	(968,053)	(1,304,058)	(3,028,391)
Total net assets - beginning	3,669,242	2,391,998	4,917,773	12,812,185	23,791,198
Total net assets - ending	\$ 3,282,746	\$ 2,022,214	\$ 3,949,720	\$ 11,508,127	\$ 20,762,807

The accompanying notes are an integral part of this financial statement.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

1. Reporting entity

The Housing Authority of the City and County of San Francisco, California (the "Authority"), is a public body organized in 1938 under the laws of the State of California for the purpose of engaging in the development, acquisition, leasing and administration of low-cost housing for individuals meeting criteria established by the U.S. Department of Housing and Urban Development ("HUD"). The governing body of the Authority is its Board of Commissioners (the "Board") composed of seven members appointed by the Mayor of the City and County of San Francisco (the "City and County"). The Mayor of the City and County has the authority to appoint the Board, but not to remove them from office. The Authority is not a component unit of the City, as defined in Governmental Accounting Standards Board Statement No. 14, as amended, *The Reporting Entity*, ("GASB No. 14") as the Board independently oversees the Authority's operations.

The definition of the reporting entity as defined by GASB No. 14 is based primarily on the notion of financial accountability. A primary government is financially accountable for the organizations that make up its legal entity. It is also financially accountable for legally separate organizations if its officials appoint a voting majority of an organization's governing body and either it is able to impose its will on that organization or there is a potential for the organization to provide specific financial benefits to, or to impose specific financial burdens on, the primary government.

Blended component units

Some component units, despite being legally separate from the primary government, are so integrated with the primary government that they are in substance part of the primary government and are therefore blended with the primary government. The Authority's operations include four blended component units, which are included in the basic financial statements and consist of legally separate entities for which the Authority is financially accountable and that have the same governing board as the Authority. The blended component units are as follows:

- Plaza East Housing Corporation
- Hayes Valley Housing Corporation
- Bernal Housing Corporation
- SFHA Housing Corporation

All of the above component units are related California not-for-profit corporations created as instrumentalities of the Authority for the purpose of providing and developing affordable housing opportunities.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

1. Reporting entity (continued)

Discretely presented component units

The following component units meet the criteria for discrete presentation in the Authority's basic financial statements. A separate "Discrete Component Unit" column is presented to clearly distinguish their balances and transactions from those of the primary government.

- Hayes Valley Apartments L.P. ("Hayes Valley I")
- Hayes Valley Apartments II L.P. ("Hayes Valley II")
- Plaza East Associates, L.P. ("Plaza East")
- Bernal Housing Associates, L.P. ("Bernal Housing")

All of the above component units are for-profit, limited partnerships. These partnerships were established to develop and operate apartment complexes. In total, these properties provide 547 housing units, of which 469 are ACC units, receiving public housing funding through the Authority. Although they do not follow government accounting, for presentation purposes certain transactions may be reflected differently in these financial statements than in separately issued information in order to conform to the presentation of the primary government. Hayes Valley Housing Corporation ("HVHC"), a blended component unit of the Authority, is one of the general partners of Hayes Valley I and Hayes Valley II. The managing general partner for Plaza East is Plaza East Housing Corporation ("PEHC"), a blended component unit of the Authority. The managing general partner for Bernal Housing is Bernal Housing Corporation ("BHC"), a blended component unit of the Authority. The Authority is accountable for HVHC, PEHC and BHC's underlying financial interest. Separately issued financial statements for the year ended December 31, 2009, for each discretely presented component unit, can be obtained by contacting the Authority at 1815 Egbert Ave., San Francisco, California 94124.

2. Government-wide and fund financial statements

The government-wide financial statements report information about the reporting government as a whole excluding fiduciary activities. The statements distinguish between governmental and business-type activities. Governmental activities generally are financed through taxes, intergovernmental revenues, and other nonexchange revenues. Business-type activities rely to a significant extent on fees and charges for support.

Governments use fund accounting, whereby funds are organized into three major categories: governmental, proprietary and fiduciary. Each fund is accounted for by providing a separate set of self-balancing accounts that constitute its assets, liabilities, fund equity, revenues and expenditures/expenses.

For financial reporting purposes, the Authority reports all of its operations as a single business activity in a single enterprise fund. Therefore, the government-wide and the fund financial statements are the same.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

2. Government-wide and fund financial statements (continued)

Enterprise funds are proprietary funds. Proprietary funds distinguish operating revenues and expenses from nonoperating items. Operating activity generally arises from providing services in connection with a proprietary fund's principal activity. The operating revenues of the Authority consist primarily of rental charges to tenants and operating grants from the Department of Housing and Urban Development ("HUD"), and include, to a lesser extent, certain operating amounts of capital grants that offset operating expenses.

Operating expenses for the Authority include the cost of administrative, maintenance, tenant services, general, utilities, protective services, depreciation and housing assistance payments. All revenues and expenses not meeting this definition are reported as nonoperating revenues and expenses, except for capital contributions and transfers, which are presented separately.

When restricted resources meet the criteria to be available for use and unrestricted resources are also available for use, it is the Authority's policy to use restricted resources first, and then unrestricted resources, as needed.

3. Measurement focus and basis of accounting

Measurement focus is a term used to describe which transactions are recorded within the various financial statements. The proprietary fund utilizes an economic resources measurement focus. The accounting objectives of this measurement focus are the determination of operating income, changes in net assets (or cost recovery), financial position, and cash flows. All assets and liabilities (whether current or noncurrent) associated with their activities are reported. Proprietary fund equity is classified as net assets.

Basis of accounting refers to when transactions are recorded regardless of the measurement focus applied. The basis of accounting used is similar to businesses in the private sector; thus, these funds are maintained on the accrual basis of accounting. Revenues are recognized when earned and expenses are recorded when the liability is incurred or economic asset used.

For financial reporting purposes, the Authority considers its HUD grants associated with operations as operating revenue because these funds more closely represent revenues generated from operating activities rather than nonoperating activities. HUD grants associated with capital acquisition and improvements are considered capital contributions and are presented after nonoperating activity on the accompanying statement of revenues, expenses and changes in net assets.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

4. Summary of programs

The accompanying basic financial statements include the activities of several housing programs subsidized by HUD and other federal entities at the Authority. A summary of each significant program is provided below.

Low Rent Housing Programs

The Low Rent Public Housing Programs include the following: asset management projects ("AMPs"), which collect operating subsidy, Public Housing Capital Fund, Capital Fund Recovery Grants, Hope VI, and various other related HUD grants including the Community Development Block Grant.

The purpose of the public housing program is to provide decent and affordable housing to low-income families at reduced rents. The developments are owned, maintained and managed by the Authority. The developments/units are acquired, developed and modernized under HUD's Development, Hope VI and Capital Fund programs.

Funding of the program's operations and development is provided by annual federal contributions or appropriations, operating subsidies and tenant rentals (determined as a percentage of family income, adjusted for family composition and other allowances).

Central Office Cost Center

The Central Office Cost Center ("COCC") is a business unit within the Authority that generates revenue through fee for service from other Authority programs and activities.

Housing Assistance Payments ("HAP") Programs

HAP Programs utilize existing privately owned family rental housing units to provide decent and affordable housing to low-income families. HAP programs include Moderate Rehabilitation, Veterans Affairs Supportive Housing ("VASH"), Disaster Voucher, and the Housing Choice Voucher ("Voucher") programs. The Moderate Rehabilitation program allows for the rehabilitation of housing units, which then must be rented to low-income individuals for a contracted period of time. The program provides owners with sufficient rental income to pay for rehabilitation costs. Developers must obtain their own financing and HUD subsidizes rents once the units are occupied. The Disaster Voucher program provides temporary rental assistance to certain HUD-assisted families and special needs/homeless families displaced as a result of Hurricanes Katrina and Rita. Funding for the Housing Choice Voucher program is provided by federal housing assistance contributions from HUD for the difference between the approved landlord contract rent and the rent paid by the tenant. In addition, the Authority receives an administrative fee to cover operating expenses.

The Housing Opportunities for Persons with AIDS ("HOPWA") program is funded through federal pass through assistance contributions through the City and County.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

4. Summary of programs (continued)

Local Programs

Other Federal programs through which the Authority received funding passed through from HUD and other Federal entities during the current year include: the Shelter Plus Care ("SPC") program, which provides rental assistance for hard-to-serve homeless persons with disabilities in connection with supportive services funded outside the program; HOPE SF, which is a grant the Authority entered into with the City and County of San Francisco to rebuild select housing sites, increase affordable housing and ownership opportunities; Mayor's Office of Community Development ("MOCD") and Mayor's Office of Housing ("MOH") Programs, which are grants the Authority entered into with the City and County as the recipient of CDBG from HUD to improve the housing stock and finance specific capital improvements; and Special Purpose Grant/Technical Assistance, which is a program that provides assistance to transfer skills and knowledge in planning, developing and administering the Community Development Block Grant ("CDBG") programs to modernize and revitalize public housing projects.

5. Assets, liabilities and net assets

a) *Cash and cash equivalents*

For purposes of the statement of cash flows, the Authority considers all unrestricted highly liquid investments with an initial maturity of three months or less to be cash equivalents.

b) *Receivables, net and accrued interest receivable, net*

Receivables consist of revenues earned during the fiscal year and not yet received. Amounts due from HUD and other governments represent reimbursable expenses or grant subsidies earned that have not been collected as of September 30, 2010; these amounts are considered fully collectible. As of September 30, 2010, there are allowances for uncollectible amounts for tenant, fraud and interest receivable in the amounts of \$2,523,477, \$164,935 and \$4,639,866, respectively. Allowances for tenant and fraud receivables are determined by management based on the specific accounts and prior experience. The allowance for interest receivable has been determined by management to be 50% of the total receivable amount.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

5. Assets, liabilities and net assets (continued)

c) *Capital assets, net*

The Authority's policy is to capitalize assets with a value in excess of \$5,000 and a useful life in excess of one year. The Authority capitalizes the costs of site acquisition and improvement, structures, equipment and direct development costs meeting the capitalization policy. Assets are valued at historical cost, or estimated historical cost if actual historical cost is not available, and contributed assets are valued at fair market value on the date contributed.

Depreciation has been provided using the straight-line method over the estimated useful lives, which range as follows:

Buildings	40 years
Building improvements	15-20 years
Furniture and equipment	3-7 years

d) *Accrued compensated absences*

Employees earn vacation at rates ranging from 10 days per year for the first 5 years of service up to a maximum of 27.5 days per year after 19 years of service. There is no requirement that vacation be taken in the year earned; however, there is a 50-day limit on the number of days an employee may accrue. Sick leave for employees is earned at rates ranging from 13 days per year for the first 9 years of service to 15 days per year for 10 or more years of service. Employees may accrue sick leave to a maximum of 130 days. In addition, the Authority must carry as a liability the payroll taxes due until the leave times are used or cashed out. Upon separation from service, employees are paid for any earned vacation days and eligible employees hired prior to September 30, 1984, are paid for any earned sick leave. In accordance with the provisions of GASB Statement No. 16, *Accounting for Compensated Absences*, the estimated liability for vested leave benefits is recorded when it is earned as an expense and the cumulative unpaid amount is reported as a liability.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

5. Assets, liabilities and net assets (continued)

e) *Deferred revenue*

Deferred revenue consists of \$2,424,475 of October 2010 HUD operating subsidy that was received in September 2010 and \$4,959,165 of a prepayment received on a long-term ground lease for land adjacent to a public housing property.

f) *Eliminations*

i) *Interprogram due to/from*

In the normal course of operations, certain programs may pay for common costs or advance funds for operational shortfalls that create interprogram receivables or payables. The interprogram receivables and payables net to zero and are eliminated for the presentation of the Authority as a whole. For the year ended September 30, 2010, offsetting amounts of \$13,262,592 were eliminated.

ii) *Fee for service*

The Authority's COCC internally charges fees to the AMPs of the Authority. These charges include management fees, bookkeeping fees, and asset management fees. For financial reporting purposes \$14,299,510 of fee for service charges have been eliminated for the year ended September 30, 2010.

iii) *Internal rent charges*

The Authority internally charges rent to programs within the Authority. For financial reporting purposes \$256,200 of internal rent charges have been eliminated for the year ended September 30, 2010.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

5. Assets, liabilities and net assets (continued)

g) *Net assets*

In accordance with GASB No. 34, total equity as of September 30, 2010, is classified into three components of net assets:

i) *Invested in capital assets, net of related debt*

This category consists of capital assets (including restricted capital assets), net of accumulated depreciation and reduced by any outstanding balances of bonds, mortgages, notes or other borrowings that are attributable to the acquisition, construction, and improvements of those assets.

ii) *Restricted net assets*

This category consists of net assets restricted in their use by (1) external groups such as grantors, creditors or laws and regulations of other governments; or (2) law through constitutional provisions or enabling legislation. The balance sheet of the Authority reports \$114,338,344 of restricted net assets which consists of the following: \$72,527,253 of mortgage notes and interest receivable restricted by HUD guidelines, \$28,570,728 of Hope VI funds spent in excess of amounts loaned (see Note B-4), \$2,955,241 of escrow reserves, and \$10,285,122 of unspent housing assistance payments in the Housing Choice Voucher and VASH programs (see Note B-10-c).

iii) *Unrestricted net assets*

This category includes all of the remaining net assets that do not meet the definition of the other two categories.

6. Tenant revenue and interest income

As provided by GASB Statement No. 34 and related guidance, tenant revenue and interest income is presented in the financial statements net of the bad debt expense for uncollectible amounts of \$1,815,708 and \$626,516, respectively.

7. Application of FASB standards

GASB Statement No. 20, *Accounting and Financial Reporting for Proprietary Funds and Other Governmental Entities that use Proprietary Fund Accounting*, offers the option of following all Financial Accounting Standards Board ("FASB") standards issued after November 30, 1989, unless the latter conflicts with or contradicts GASB pronouncements, or not following FASB standards issued after such date. The Authority has elected the option to follow FASB pronouncements issued after November 30, 1989, except for those that conflict with or contradict GASB pronouncements.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

8. Use of estimates

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

9. Budgets

Budgets are prepared on an annual basis for each major program and are used as a management tool throughout the accounting cycle. Budgets are not, however, legally adopted nor required in the basic financial statement presentation.

10. Income taxes

Organizations that followed the provisions of FSP FIN 48-3, which delayed the implementation of FIN 48 (FASB ASC 740-10-65), *Accounting for Uncertainty for Income Taxes*, were required to implement those provisions for the fiscal year ended 2010. The Authority qualifies as a tax-exempt governmental entity and, accordingly, no provision for Federal or State income tax is required. In addition, the blended and discrete component units had no tax liability due as of and for the year ended December 31, 2009.

11. Leasing activities

The Authority is the lessor of dwelling units to low-income and market rate residents. The low-income rents under the leases are determined generally by the resident's income as adjusted for eligible deductions regulated by HUD, although the resident may opt for a flat rent. Leases may be cancelled by the lessee at any time or renewed every year. The Authority may cancel the leases only for cause. A significant majority of the capital assets are used in these leasing activities. Revenues associated with these leases are recorded in the accompanying financial statements and related schedules within tenant revenue.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE A - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

12. Hope VI leasing activities

a. *North Beach Housing Associates (North Beach)*

The Authority leased the land for 75 years on which the North Beach property is built, located in San Francisco, California, for an annual rent amount of \$800,000 beginning January 1, 2005 (see Note B-14). The rent is payable in arrears starting on July 1, 2006 and on July 1 of each succeeding year until the termination of the lease, to the extent of 70% of residual receipts from the preceding year. Additional base rent is also payable to the extent of cash flow generated by North Beach in excess of \$114,500 in a particular year to be increased by 3% annually. For the year ended September 30, 2010, the Authority received the ground lease rent of \$226,944.

b. *Valencia Gardens Housing Limited Partnership (Valencia Gardens)*

The Authority leased the land for 65 years on which the Valencia Gardens complex is built, located in San Francisco, California, for an annual rent amount of \$200,000 (see Note B-14). The rent is payable in arrears starting on July 1, 2006 and on July 1 of each succeeding year until the termination of the lease to the extent of 33% of residual receipts from the preceding year. Additional base rent is also payable of the lesser of \$100,000 from residual receipts or such amounts as may be permissible under Multifamily Housing Program regulations. Any unpaid base rent shall not accrue. For the year ended September 30, 2010, the Authority did not receive any amounts for the ground lease rent.

NOTE B - DETAILED NOTES

1. Deposits

As of September 30, 2010, the Authority's cash and cash equivalents consist of demand deposits of \$15,169,122, which includes an overnight repurchase agreement of \$9,998,598.

In accordance with GASB No. 40, the Authority's exposure to deposit and investment risk is disclosed as follows:

Interest Rate Risk. Interest rate risk is the risk that changes in interest rates will adversely affect the fair value of an investment. The Authority's policy is to manage its exposure to declines in fair values by limiting the weighted average maturity of its investment portfolio. As of September 30, 2010, the Authority had no investments, and therefore was not exposed to interest rate risk.

Credit Risk. Credit risk is the risk that an issuer or other counterparty to an investment will not fulfill its obligations. It is the Authority's policy to follow the HUD regulations by only having direct investments and investments through mutual funds to direct obligations, guaranteed obligations, or obligations of the agencies of the United States of America. As of September 30, 2010, the Authority mitigated their exposure to credit risk by following HUD regulations.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE B - DETAILED NOTES (continued)

1. Deposits (continued)

Custodial Credit Risk. Custodial credit risk is the risk that in the event of a bank failure, the Authority's deposits or investments may not be returned. The Authority does have a deposit and investment policy for custodial credit risk, which requires collateral to be held in the Authority's name by its agent or by the bank's trust department. The California Government Code requires California banks to secure deposits of public institutions not covered by federal deposit insurance by pledging government securities as collateral. The market value of pledged securities must equal 110% of the deposits. The collateral must be held at the pledged bank's trust department or other bank, acting as the pledging bank's agent. Of the deposits in financial institutions, \$250,000 was insured by the Federal Depository Insurance Corporation. The remaining amounts were fully collateralized by the financial institution with governmental securities held either by the financial institution's trust department or other banks acting as the financial institution's agent, but were not in the Authority's name.

Restricted Cash

As of September 30, 2010, restricted cash consists of:

Voucher HAP reserves	\$ 8,326,526
Tenant security deposits	1,201,625
Section 8 FSS escrow	966,635
Escrow reserves	<u>2,955,241</u>
	<u>\$ 13,450,027</u>

2. Receivables, net

As of September 30, 2010, receivables, net as presented in the accompanying balance sheet consist of:

Tenant accounts receivable	\$ 3,710,967
Fraud recovery	330,639
Non-dwelling rent receivable	278,761
Insurance claim receivable	137,743
Other miscellaneous receivables	<u>258,632</u>
	<u>4,716,742</u>
Allowance for doubtful accounts - tenants	(2,523,477)
Allowance for doubtful accounts - fraud	<u>(164,935)</u>
	<u>\$ 2,028,330</u>

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE B - DETAILED NOTES (continued)

3. Notes receivable and accrued interest receivable, net

The Authority has entered into six limited partnerships under its Hope VI program for the purpose of developing low-income and mixed income housing financed by HUD and private tax credit investors. As part of the project financing structure, the six limited partnerships received HUD Hope VI funds through the Authority or its component unit housing corporations, and issued seven promissory notes payable to the Authority in return for long-term leases on the Authority's low income land sites. The following is a summary of those transactions.

	Balance at October 1, 2009	Additions	Reductions	Balance at September 30, 2010	Current Portion
Notes receivable:					
Hayes Valley I	\$ 1,600,000	\$ -	\$ -	\$ 1,600,000	\$ -
Hayes Valley II	3,250,000	-	-	3,250,000	-
Bernal Housing	20,107,760	-	-	20,107,760	-
Plaza East	13,464,813	-	-	13,464,813	-
North Beach	13,848,535	-	-	13,848,535	-
Valencia Gardens	24,426,275	-	(310,000)	24,116,275	-
Total notes receivable	<u>\$ 76,697,383</u>	<u>\$ -</u>	<u>\$(310,000)</u>	<u>\$ 76,387,383</u>	<u>\$ -</u>
Accrued interest receivable:					
Hayes Valley I	1,231,449	201,398	-	1,432,847	1,432,847
Hayes Valley II	2,215,928	349,003	-	2,564,931	2,564,931
Bernal Housing	186,087	20,298	(100,000)	106,385	106,385
Plaza East	2,012,895	266,889	-	2,279,784	2,279,784
North Beach	2,380,342	415,445	-	2,795,787	2,795,787
Valencia Gardens	-	-	-	-	-
Subtotal	<u>8,026,701</u>	<u>1,253,033</u>	<u>(100,000)</u>	<u>9,179,734</u>	<u>9,179,734</u>
Less allowance	<u>(4,013,348)</u>	<u>(626,516)</u>	<u>-</u>	<u>(4,639,864)</u>	<u>(4,639,864)</u>
Total accrued interest	<u>\$ 4,013,353</u>	<u>\$ 626,517</u>	<u>\$(100,000)</u>	<u>\$ 4,539,870</u>	<u>\$ 4,539,870</u>

a. *Hayes Valley I*

The Authority issued a 57-year \$1,600,000 promissory note, also referred to as the second mortgage loan, dated November 25, 1996, and maturing on November 24, 2053 to Hayes Valley. Based on the note's simple interest rate of 12% per annum through December 31, 1997 and compound interest rate of 7.02% per annum thereafter, the Authority has accrued interest of \$1,432,847 as of September 30, 2010. The principal and accrued interest is payable only from net available project cash flow, net project proceeds or project condemnation proceeds, as defined in the promissory note. The Authority has established an allowance for uncollectible interest representing 50% of accrued interest at September 30, 2010.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE B - DETAILED NOTES (continued)

3. Notes receivable and accrued interest receivable, net (continued)

b. *Hayes Valley II*

The Authority issued a 57-year, \$3,250,000 promissory note, also referred to as the second mortgage loan, dated December 1, 1997 and maturing on December 1, 2054 to Hayes Valley II. Based on the note's simple interest rate of 12% per annum through December 31, 1998 and compound interest rate of 6.31% per annum thereafter, the Authority has accrued interest of \$2,564,931 as of September 30, 2010. The principal and interest is payable only from net available project cash flow, net project proceeds or project condemnation proceeds, as defined in the promissory note. The Authority has established an allowance for uncollectible interest representing 50% of accrued interest at September 30, 2010.

c. *Bernal Housing*

The Authority issued a 55-year, \$2,465,501 promissory note, also referred to as the predevelopment loan, dated November 23, 1999 and maturing on November 22, 2054 to Bernal Housing Associates ("Bernal"). Due to a partial early repayment of \$2,380,861 on the loan and an adjustment increase of \$250,000, the principal balance was reduced to \$334,640. Based on the note's compound interest rate of 0.1% per annum, the Authority has calculated a cumulative accrued interest amount of \$14,002 as of September 30, 2010. The principal and accrued interest is payable only from net available project cash flow, net project proceeds or project condemnation proceeds, as defined in the promissory note. The Authority has established an allowance for uncollectible interest representing 50% of accrued interest at September 30, 2010.

The Authority issued a 55-year, \$4,287,500 promissory note, also referred to as the construction/permanent loan, dated November 23, 1999 and maturing on November 22, 2054 to Bernal. Based on the note's compound interest rate of 0.1% per annum, the Authority has accrued interest of \$39,081 as of September 30, 2010. The principal and accrued interest is payable only from net available project cash flow, net project proceeds or project condemnation proceeds, as defined in the promissory note. The Authority has established an allowance for uncollectible interest representing 50% of accrued interest at September 30, 2010.

The Authority issued a 55-year, \$15,500,000 promissory note, also referred to as the permanent loan, dated November 23, 1999 and maturing on November 22, 2054 to Bernal. Based on the note's compound interest rate of 0.1% per annum, the Authority has accrued interest of \$53,304 as of September 30, 2010. The principal and accrued interest is payable only from net available project cash flow, net project proceeds or project condemnation proceeds, as defined in the promissory note. During the fiscal year ended September 30, 2010, Bernal paid \$100,000 in accrued interest. The Authority has established an allowance for uncollectible interest representing 50% of accrued interest at September 30, 2010.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE B - DETAILED NOTES (continued)

3. Notes receivable and accrued interest receivable, net (continued)

d. *Plaza East*

Plaza East Housing Corporation, a blended component unit, issued a 65-year, \$2,700,000 Applicable Federal Rate ("AFR") promissory note dated September 18, 2000 and maturing on September 17, 2065 to Plaza East Associates, L.P. ("Plaza East"). Based on the note's simple interest rate of 10% per annum through December 31, 2001 and compound interest rate of 6.09% per annum thereafter, the Authority has accrued interest of \$1,899,553 as of September 30, 2010. The principal and interest is payable only from net available project cash flow, net project proceeds or project condemnation proceeds, as defined in the promissory note. The Authority has established an allowance for uncollectible interest representing 50% of accrued interest at September 30, 2010.

The Authority, through SFHA Housing Corporation, a blended component unit, issued a 65-year, \$10,764,813 promissory note dated September 18, 2000 and maturing on September 17, 2065 to Plaza East. Based on the note's simple interest rate of 10% per annum through December 31, 2001 and no interest payable thereafter, the Authority has accrued interest of \$380,230, as of September 30, 2010. The principal and interest is payable only from net available project cash flow, net project proceeds or project condemnation proceeds, as defined in the promissory note. The Authority has established an allowance for uncollectible interest representing 50% of accrued interest at September 30, 2010.

e. *North Beach*

The Authority issued a 55-year, \$13,848,535 promissory note dated December 1, 2002 and maturing on November 30, 2057 to North Beach Development Associates, LLC ("North Beach"). This note was an amendment of the residential promissory note for \$4,911,097 and the commercial loan of \$313,001, both dated November 28, 2001 to finance the development of the North Beach affordable rental property pursuant to the Hope VI construction/permanent loan agreement. Based on the note's simple interest rate of 3% per annum, the Authority has calculated a cumulative accrued interest amount of \$2,795,787 as of September 30, 2010. The principal and accrued interest is payable only from net available project cash flow, net project proceeds or project condemnation proceeds, as defined in the promissory note. The Authority has established an allowance for uncollectible interest representing 50% of accrued interest at September 30, 2010.

f. *Valencia Gardens*

The Authority established a partnering agreement with Mission Housing Development Corporation ("MHDC"), a California non-profit public benefit corporation, which gives MHDC the exclusive right to develop and revitalize the Valencia Gardens development funded by the Hope VI grant agreement between the Authority and HUD. The Authority issued a 55-year, \$15,716,275 permanent loan to finance the construction and development of the Valencia Gardens development, dated September 1, 2004 and maturing on August 31, 2059.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE B - DETAILED NOTES (continued)

3. Notes receivable and accrued interest receivable, net (continued)

f. *Valencia Gardens (continued)*

This permanent loan does not provide for the payment of interest, however, if a default occurs, interest at 10% on the principal balance shall accrue. The principal and accrued interest, if any, is payable only from the net available project cash flow, net project proceeds or project condemnation proceeds, as defined in the promissory note.

In addition, the Authority has a note receivable of \$8,400,000 from Valencia Gardens for repayment of the Multifamily Housing Revenue Bonds that were loaned. The interest and payment terms are identical to those of the bonds issued (see Note B-6-a).

4. Investment in joint venture

The HUD grant funds advanced to the entities noted in Note B-3 in excess of promissory notes is recorded as investment in joint ventures of \$14,258,463, \$5,023,159, \$1,665,626, \$4,529,460, and \$3,094,020 for Hayes Valley, Bernal, Plaza East, North Beach and Valencia Gardens, respectively, totaling \$28,570,728 as of September 30, 2010.

5. Capital assets, net

A summary of changes in capital assets is as follows:

	Balance at October 1, 2009	Transfers in/ Additions	Transfers out/ Deletions	Balance at September 30, 2010
Non-depreciable:				
Land	\$ 11,678,889	\$ -	\$ -	\$ 11,678,889
Construction in progress	2,043,677	638,145	-	2,681,822
Total non-depreciable	13,722,566	638,145	-	14,360,711
Depreciated:				
Buildings and improvements	134,465,133	13,747,683	-	148,212,816
Furniture and equipment	7,655,185	409,232	-	8,064,417
Total depreciated	142,120,318	14,156,915	-	156,277,233
Total capital assets	155,842,884	14,795,060	-	170,637,944
Accumulated depreciation:				
Buildings and improvements	(71,405,565)	(4,938,926)	-	(76,344,491)
Furniture and equipment	(6,668,349)	(368,989)	-	(7,037,338)
Less accumulated depreciation	(78,073,914)	(5,307,915)	-	(83,381,829)
Capital assets, net	\$ 77,768,970	\$ 9,487,145	\$ -	\$ 87,256,115

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE B - DETAILED NOTES (continued)

6. Noncurrent liabilities

A summary of changes in noncurrent liabilities is as follows:

	Balance at October 1, 2009	Additions	Reductions	Balance at September 30, 2010	Current Portion
Bonds payable	\$ 8,710,000	\$ -	\$ (310,000)	\$ 8,400,000	\$ 330,000
Accrued compensated absences	1,891,649	1,002,920	(993,849)	1,900,720	173,633
OPEB liability	1,503,401	838,287	-	2,341,688	-
Deferred revenue - lease	4,959,165	-	-	4,959,165	-
Due to government entities	300,000	-	-	300,000	-
Total	<u>\$ 17,364,215</u>	<u>\$ 1,841,207</u>	<u>\$ (1,303,849)</u>	<u>\$ 17,901,573</u>	<u>\$ 503,633</u>

a. *Multifamily Housing Revenue Bonds (Valencia Gardens)*

On October 1, 2004, the Authority issued Multifamily Housing Revenue Bonds, Series 2004 ("Permanent Bonds") in the principal amount of \$40,000,000 to provide permanent financing for the Valencia Gardens Development. The Permanent Bonds shall mature on September 1, 2049 and are secured by a deed of trust on the property. Proceeds from the sale of the Permanent Bonds were not received by the Authority, but were deposited with a trustee in accordance with a loan agreement (dated October 1, 2004) between the Authority and Valencia Gardens Housing, L.P. The loan agreement stipulates that Valencia Gardens Housing, L.P. agrees to repay on behalf of the Authority, the loan in the amounts and at times necessary to enable the trustee, on behalf of the Authority, to pay when due all principal, interest and premium, if any, payable with respect to the Permanent Bonds whether at maturity or by redemption or acceleration or otherwise. The loan agreement shall be in full force and effect from the date of execution, and shall continue in effect as long as any of the Permanent Bonds are outstanding. The interest rate on the Permanent Bonds is determined periodically by a Remarketing Agent. As of September 30, 2010, the Permanent Bonds has a balance of \$8,400,000.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE B - DETAILED NOTES (continued)

6. Noncurrent liabilities (continued)

a. *Multifamily Housing Revenue Bonds (Valencia Gardens) (continued)*

The future principal maturities for the bonds payable at September 30 are as follows:

<u>Year</u>	<u>Principal</u>
2011	\$ 330,000
2012	350,000
2013	370,000
2014	360,000
2015	415,000
2016-2020	2,490,000
2021-2025	1,535,000
2026-2030	840,000
2031-2035	1,180,000
2036-2037	530,000
	<u>\$ 8,400,000</u>

7. Pension plan

Plan description: Union member employees of the Authority are eligible for pension benefits in accordance with their respective union contracts. The Authority is required to fund the union pension plans through union dues which call for contributions ranging from \$4.85 to \$18.03 per work hour. Total union pension costs were \$2,041,817 for the year ended September 30, 2010.

Beginning March 1, 1961, all non-union employees of the Authority are required to participate in the California State Public Employees Retirement System ("PERS") Plan, an agent multi-employer defined benefit pension plan that acts as a common investment and administrative agent for participating public entities within the state of California. Benefit provisions and all other requirements are established by State statutes within the Public Employee's Retirement Law. Copies of the PERS annual financial report may be obtained from their executive office: 400 P Street, Sacramento, California 95814.

Eligibility: Authority employees who retire at or after age 50 with five years of service are entitled to an annual retirement benefit payable monthly for life. This monthly benefit is based on years of service, average salary during the last twelve consecutive months of work or another consecutive 12-month period, if higher, and age at retirement. Vesting occurs after five years of service. PERS also provides death and disability benefits.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE B - DETAILED NOTES (continued)

7. Pension plan (continued)

Funding Policy: Participants are required to contribute 7% of their annual covered salary. The Authority makes the contribution required of their employees on their behalf. The Authority is required to contribute at an actuarially determined rate that is necessary to fund the benefit for its members. The Authority's required contribution rate for the year ended September 30, 2010 based on the PERS actuarial determination was 9.97% and the amount was \$1,511,204. The contribution requirements are established and may be amended by the PERS Board of Administration.

Effective March 1, 2002, under a Memorandum of Understanding ("MOU") between the Authority and the San Francisco Municipal Employee's Association ("MEA"), the Authority contributes the entire 7% participant's contribution of certain covered MEA employees. Effective September 30, 2005, under another MOU between the Authority and the Service Employees International Union Local 1021 ("SEIU Local 1021"), the Authority contributes the entire 7% participant's contribution of all covered SEIU Local 1021 employees. The total of the 7% participant's contributions for employees covered by the MEA and the SEIU Local 1021 MOUs that was paid by the Authority amounted to \$812,737 for the year ended September 30, 2010.

Annual pension costs: For the fiscal year ended September 30, 2010, the Authority's annual pension costs of \$1,378,253 for PERS were equal to the Authorities required contributions. The Authority made payments to PERS totaling \$2,344,148, which included contributions made to PERS by the Authority on behalf of its employees of \$812,737 and amounts contributed by employees of \$153,156. The Authority's annual pension cost for PERS was equal to the Authority's required and actual contributions which were determined as part of the June 30, 2007, June 30, 2008 and June 30, 2009 actuarial valuations using the entry age normal cost method. Three-year trend information is as follows:

Fiscal Year Ended	Annual Pension Cost (APC)	Percentage of APC contributed	Net Pension Obligation
9/30/2008	\$ 1,553,257	100%	\$ -
9/30/2009	\$ 1,498,536	100%	\$ -
9/30/2010	\$ 1,378,253	100%	\$ -

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE B - DETAILED NOTES (continued)

7. Pension plan (continued)

Funded Status and Funding Progress: The schedule below shows the balance of the actuarial accrued liability attributable to the Authority, and the unfunded amount as of September 30, 2010:

Actuarial Valuation Date	Actuarial Value of Assets (a)	Accrued Liability (b)	Unfunded Liability (UL) (b-a)	Funded Ratio (a/b)	Annual Covered Payroll (c)	UL as % of Covered Payroll ((b-a)/c)
6/30/2007	\$ 84,422,007	\$ 87,184,213	\$ 2,762,206	97%	\$ 13,340,021	21%
6/30/2008	\$ 89,076,261	\$ 92,061,114	\$ 2,984,853	97%	\$ 13,770,160	22%
6/30/2009	\$ 91,597,742	\$ 97,692,648	\$ 6,094,906	94%	\$ 13,768,652	44%

Actuarial Methods and Assumptions: Actuarial valuations involve estimates of the value of reported amounts and assumptions about the probability of events in the future. Amounts determined regarding the funded status of the pension and the annual required contributions by the Authority are subject to continual revision as actual results are compared to past expectations and new estimates are made about the future. The required schedule of funding progress presented as required supplementary information provides multi-year trend information that shows whether the actuarial value of plan assets is increasing or decreasing over time relative to the actuarial accrued liability for benefits.

The following summarizes other significant methods and assumptions used in valuing the AAL and benefits under the plan.

Actuarial valuation date	6/30/09
Amortization method	Level percent of payroll
Remaining amortization period	24 years as of valuation date
Asset valuation method	15 year smoothed market
Actuarial assumptions:	
Rate of return	7.75%
Projected salary increases	3.55% to 14.45% dependent on age, service and type of employment
Inflation	3%
Payroll growth	3.25%
Individual salary growth rate	A merit scale varying by duration of employment coupled with an assumed inflation growth rate of 3% and an annual production growth of 0.25%

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE B - DETAILED NOTES (continued)

8. Other postemployment benefits other than pension

Plan Description: The Authority participates in an agent multiple-employer defined benefit healthcare plan (the "Plan") that provides postretirement coverage for the lifetime of the retiree with continuation to eligible surviving spouses whose benefits continue under PERS. Benefits are provided through the PERS Public Employees' Health Care Fund, which covers both active and retired members. Benefits and contributions are established by the Memorandums of Understanding (the "Agreements") between the Authority and the San Francisco Municipal Executives' Association and the SEIU Local 1021 and may only be amended by an approved change to the Agreements. Contributions are subject to minimum contribution levels established by the Plan. The Plan is included in a comprehensive annual financial report that includes financial statements and other required supplemental information. The report may be obtained by contacting the Plan administrator.

Eligibility: To be eligible to receive retiree medical benefits, participants must be 50 years of age and have 5 years of covered PERS service or by qualifying for disability retirement status.

Funding Policy: The Authority contributes to the Plan 80% of the negotiated medical premiums per the Agreement. For fiscal year 2010, the Authority contributed \$605,313 to the plan. The postretirement medical benefits are currently funded on a pay-as-you-go basis. No assets have been segregated and restricted to provide postretirement benefits.

Annual OPEB Cost and Net OPEB Obligation: The Authority's annual other postemployment benefit ("OPEB") cost (expense) is calculated on the annual required contribution of the employer ("ARC"), an amount actuarially determined in accordance with the parameters of GASB Statement 45. The ARC represents a level of funding that, if paid on an ongoing basis, is projected to cover normal cost each year and to amortize any unfunded actuarial liabilities (or funding excess) over a period not to exceed thirty years.

The Authority's annual OPEB cost for the fiscal year 2010 and the related information for each plan are as follows (dollar amounts in thousands):

Annual required contribution	\$ 1,461,571
Interest on net OPEB obligation	75,170
Adjustment to annual required contribution	<u>(93,141)</u>
Annual OPEB cost	1,443,600
Contributions made	<u>605,313</u>
Increase in net OPEB obligation	838,287
Net OPEB obligation - beginning of year	<u>1,503,401</u>
Net OPEB obligation - end of year	<u>\$ 2,341,688</u>

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE B - DETAILED NOTES (continued)

8. Other postemployment benefits other than pension (continued)

The Authority's annual OPEB cost, the percentage of annual OPEB cost contributed to the plan and the net OPEB obligation for fiscal years 2008, 2009 and 2010 were as follows:

Fiscal Year Ended	Annual OPEB Cost	Percentage of Annual OPEB Cost Contributed	Net OPEB Obligation
9/30/2008	\$ 1,280,391	39.8%	\$ 771,391
9/30/2009	\$ 1,271,170	42.4%	\$ 1,503,401
9/30/2010	\$ 1,443,600	41.9%	\$ 2,341,688

Funded Status and Funding Progress: The schedule below shows the balance of the actuarial accrued liability ("AAL") attributable to the Authority, all of which was unfunded as of September 30, 2010:

Actuarial Valuation Date	Actuarial Value of Assets (a)	Actuarial Accrued Liability (AAL) (b)	Unfunded AAL (UAAL) (b-a)	Funded Ratio (a/b)	Estimated Covered Payroll (c)	UAAL as % of Covered Payroll ((b-a)/c)
6/30/2008	\$ -	\$ 12,022,086	\$ 12,022,086	0%	\$ 21,987,515	55%
9/30/2010	\$ -	\$ 14,182,116	\$ 14,182,116	0%	\$ 22,251,205	64%

Actuarial valuations involve estimates of the value of reported amounts and assumptions about the probability of events in the future. Amounts determined regarding the funded status of the plan and the annual required contributions by the Authority are subject to continual revision as actual results are compared to past expectations and new estimates are made about the future. The required schedule of funding progress presented as required supplementary information provides multi-year trend information that shows whether the actuarial value of plan assets is increasing or decreasing over time relative to the actuarial accrued liability for benefits.

Actuarial Methods and Assumptions: Projections of benefits are based on the substantive plan (the "Plan" as understood by the employer and plan members) and include the types of benefits in force at the valuation date and the pattern of sharing benefit costs between the Authority and the plan members to that point. Actuarial calculations reflect a long-term perspective and employ methods and assumptions that are designed to reduce short-term volatility in actuarial accrued liabilities and the actuarial value of assets.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE B - DETAILED NOTES (continued)

8. Other postemployment benefits other than pension (continued)

The actuarial cost method used in the valuation to determine the Actuarial Accrued Liability (AAL) and the Actuarial Required Contribution (ARC) was the Projected Unit Credit Method with service prorated. Under this method, the total present value of benefits is determined by projecting the benefit to be paid after the expected retirement date (or other event) and discounting those amounts to the valuation date. The normal cost is computed by dividing the total present value of benefits by the participant's total service (actual plus expected service) at retirement. The AAL under this method represents the total present value of benefits multiplied by the ratio of the participant's actual service to date and divided by expected service at retirement. The AAL for participants currently receiving payments and deferred vested participants is calculated as the actuarial present value of future benefits expected to be paid. No normal cost for these participants is payable. The AAL and normal cost were calculated at the measurement date, which is the beginning of the applicable fiscal year using standard actuarial techniques.

The following summarizes other significant methods and assumptions used in valuing the AAL and benefits under the plan.

Actuarial valuation date	9/30/10
Amortization method	30 year level dollar, open period
Remaining amortization period	28 years
Actuarial assumptions:	
Discount rate	5%
Return on Assets	5%
Health care cost trend period	Grades down over four years
Health care cost trend rates	8% initial to 5% ultimate
Mortality table	1994 Group Annuity Mortality Tables

Further, the valuation assumes that the Authority will continue to fund the liability on a pay-as-you-go basis and that the Authority's policy is that its per-capita contribution for retiree benefits will remain at the 2010 level. As a result, the retiree contributions will be increased to the extent necessary so that they are sufficient to provide for the difference between the gross costs and the fixed Authority contributions.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE B - DETAILED NOTES (continued)

9. Risk management

The Authority is exposed to various risks of loss related to torts; theft of, damages to, and destruction of assets; errors and omissions; injuries to employees, and natural disasters. As part of the Authority's risk management program, certain commercial insurance policies are purchased, and the Authority participates in an insurance pool and a risk retention group for property insurance and workers compensation. The insurance pool and risk retention group are reinsured through other reinsurance companies and are not retrospectively rated and do not pass on risk of loss to participants.

The Bay Area Housing Authority Risk Management Agency (BAHARMA) was formed under a joint powers agreement between the Housing Authority of the City and County of San Francisco, California and Oakland Housing Authority. BAHARMA provides no pooling or sharing of risk between its two members. Its purpose is to provide administrative and risk management services to the participating housing authorities for their worker's compensation self-insurance funds. BAHARMA maintains excess insurance coverage for claims over \$500,000 up to \$5,000,000 per occurrence to reduce its members' exposure to large losses in its workers' compensation program. Claims are paid from the retained earnings of BAHARMA and from contributions remitted from the Authority and the Oakland Housing Authority. The Authority's and Oakland Housing Authority's allocated share of the BAHARMA assets and liabilities at September 30, 2010 was 49.5% and 50.5%, respectively.

10. Commitments and contingencies

a. *Legal*

In the normal course of operations, the Authority is party to various pending or threatened legal actions. As of the date of this report, the Authority expects all instances to be fully covered by insurance.

b. *Grants and contracts*

The Authority participates in various federally and locally-assisted grant programs that are subject to review and audit by the grantor agencies. Entitlements to these resources are generally conditional upon compliance with the terms and conditions of grant agreements and applicable federal and other regulations, including the expenditure of resources for allowable purposes. Any disallowance resulting from a review or audit may become a liability of the Authority; however, as of the date of this report, no such liabilities are reflected in the accompanying basic financial statements.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE B - DETAILED NOTES (continued)

10. Commitments and contingencies (continued)

c. *Housing assistance payment reserves*

The Authority is no longer required to complete a settlement statement, HUD Form 52681, for the Voucher program. As a result, in accordance with GASB Statement No. 33 and PIH Notice 2008-9, the amount of current year program subsidy received in excess of associated qualifying expenses is presented as net program income or loss with the cumulative excess funding being reflected in restricted net assets in the basic financial statements. As of September 30, 2010, unspent cumulative excess funding of \$8,326,526 for Voucher and \$1,958,596 for the VASH program are subject to possible future recapture.

d. *Payment in lieu of taxes ("PILOT")*

A cooperative agreement between the City and County and the Authority dated January 21, 1965 exempts all public housing developments of the Authority from all real and personal property taxes and special assessments collected by the local tax collector. During the period of this exemption, the Authority agrees to make alternate payments to the City and County. Such payments are referred to as payments in lieu of taxes ("PILOT"). As specified in the agreements, the Authority's PILOT equals total rent charged less utilities multiplied by 10%.

In order to ease the financial burden on the Authority, the Board of Supervisors waived the PILOT obligation during the fiscal years 1982 through 1990. The Authority, through the Office of the Mayor, requested that the Board of Supervisors waive its PILOT obligations related to the fiscal years 1991-1996. These requests have been forwarded to the Board of Supervisors for approval. The Board of Supervisors has not yet acted on the PILOT waiver request for the fiscal years 1991 through 1996. The Authority has not communicated with the City and County about waiving the payment of PILOT for the fiscal years 1997 through 2010. It is uncertain whether the Authority will be required to pay the PILOT. However, to date, the Authority has not received any subsequent invoices for payment from the Office of the Controller for the City and County of San Francisco. Should payment be required, the obligation to the City and County would be \$10,627,335 for the fiscal years 1991 through 2010. The management of the Authority believes the waivers will be approved and PILOT for the fiscal year will not be required by the City and County. Furthermore, the Authority has been making payments to the City and County of San Francisco that management considers a tax or assessment for police services that would offset this contingent liability. Accordingly, no provision for PILOT has been made in the accompanying financial statements.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE B - DETAILED NOTES (continued)

10. Commitments and contingencies (continued)

e. *Funds awarded*

The Authority receives funding from HUD through Hope VI, Capital Fund Recovery Grants and the Public Housing Capital Fund Program to help subsidize the cost of redevelopment of projects, project repairs, improvements, component unit developments, and certain operating costs. Remaining unspent awards as of September 30, 2010, are as follows:

Public Housing Capital Fund Program	\$ 18,365,207
Capital Fund Stimulus Formula Recovery Act Funded Grant	6,797,658
Capital Fund Stimulus Competitive Recovery Act Funded Grant	<u>15,169,647</u>
Total remaining unspent awards	<u>\$ 40,332,512</u>

As of September 30, 2010, all Hope VI funds were spent.

11. Concentrations

For the year ended September 30, 2010, approximately 86% of revenues and 46% of receivables reflected in the basic financial statements are from HUD.

The Authority operates in a heavily regulated environment. The operations of the Authority are subject to the administrative directives, rules and regulations of federal, state and local regulatory agencies, including, but not limited to HUD. Such administrative directives, rules and regulations are subject to change by an act of congress or an administrative change mandated by HUD. Such changes may occur with little notice or inadequate funding to pay for the related costs and the additional administrative burden to comply with the changes.

12. Financial data schedule

As required by HUD, the Authority prepares its financial data schedule in accordance with HUD requirements in a prescribed format. The schedule's format excludes depreciation expense, housing assistance payments and extraordinary maintenance expense from operating activities, includes investment revenue, HUD capital grants revenue, gains and losses on the disposal of fixed assets and interest expense in operating activities, differs in classifications of current and noncurrent assets, and reflects tenant and interest revenue separate from bad debt expense, which differs from the presentation of the basic financial statements.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE B - DETAILED NOTES (continued)

13. Subsequent events

- a. On December 22, 2010, the Authority entered into a \$29.7 million, 2-year service agreement with Ameresco, a leading provider of energy efficiency solutions, to implement an Energy Services Capital Improvement Project for utility-related capital needs at the developments. The project leverages public sector funds through the issuance of \$34.2 million of both federally-taxable and tax-exempt bonds.
- b. Construction of the Hunters View development is scheduled to start in August 2011. It is the first public housing project to be revitalized under the HOPE SF program, a partnership between the Mayor's Office of Housing and the Authority aimed at revitalizing distressed public housing developments. The project has developed a financing plan that leverages available federal, state, local and private funding. The affordable rental housing portion has a total development cost of about \$79 million. The Authority utilizes the non-HOPE VI HUD Funding that includes the Capital Fund Formula Grant (ARRA) for \$6 million, Replacement Housing Factor Fund of \$1,029,323 and the Neighborhood Initiatives Grant of \$1,058,400.
- c. In preparing these financial statements, the Authority has evaluated events and transactions for potential recognition or disclosure through June 29, 2011, the date the financial statements were available to be issued.

14. Related parties

As mentioned in Note A-12, Note B-3-e and Note B-3-f, the Authority has entered into ground leases and loans associated with the development of North Beach Place ("NBP") and Valencia Gardens Housing, LP, ("VGH"). North Beach Development Associates invests in real estate and constructs, operates and leases property. The property consists of a 341 unit rental apartment complex known as NBP. NBP was placed in service in 2004 and fully leased in 2005. VGH was organized to develop, own and operate an apartment complex of 260 units for low income housing.

NBP and VGH are not considered to be component units of the Authority as of September 30, 2010.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE C - DISCRETELY PRESENTED COMPONENT UNITS

The following partnerships are considered discrete component units of the Authority and are presented in accordance with GASB No. 14. Certain items may have changed for presentation purposes from the separately issued audited financial statements to conform to the Authority's presentation. The following footnotes are presented pursuant to GASB No. 14, which states that the reporting entity's financial statements should make those component unit disclosures that are essential to fair presentation of the financial reporting entity's basic financial statements. The following footnotes are those that are material to the Authority and are not meant to be a full representation of each component unit's required disclosures. A copy of each component unit's separately issued audited financial statements can be obtained from the Authority's management.

1. Bernal Housing Associates, L.P. ("Partnership")

a. *Credit risk*

The Partnership maintains its cash in bank accounts, which, at times, may exceed federally insured limits. The Partnership has not experienced any losses in such accounts. The Partnership believes it is not exposed to any significant credit risk.

b. *Syndication fee*

Pursuant to the Partnership Agreement, the Managing General Partner, Bernal Housing Corporation, was paid a syndication fee in the amount of \$450,000 for its services in negotiating the terms of the investment by the Investor Limited Partner. The syndication fee was required to be paid out of the capital contributions of the Investor Limited Partner to the extent those funds were not required to pay for project costs. As of December 31, 2009, the entire amount was paid from contributions of the Investor Limited Partner.

c. *Incentive management fee*

Pursuant to the Partnership Agreement, the Managing General Partner will be paid an incentive management fee for services in managing the project. In consideration for such services, the Partnership shall pay a fee, solely from Net Cash Flow, and such fee shall not be cumulative. No such fee was accrued or paid by the Partnership during 2009.

d. *Ground lease*

The Partnership has executed a 75-year ground lease agreement with the Authority. The lease is subject to various use restrictions and operating requirements, as defined in the agreement, including the requirement that all 160 of the units be continuously set aside during the term of the Regulatory and Operating Agreement for occupancy by public housing eligible households. The terms of the lease provide rent of \$10 per year throughout the term of the Regulatory Agreement. Upon expiration of the lease, all improvements, alterations, additions, equipment and fixtures shall become the property of the Authority without cost or charge.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE C - DISCRETELY PRESENTED COMPONENT UNITS (continued)

1. Bernal Housing Associates, L.P. ("Partnership") (continued)

e. *Long-term debt*

i. *Permanent loan*

A permanent loan of \$15,500,000 was provided by the Authority. Under the terms of the loan, interest shall accrue at 0.1%, compounded annually. Interest and principal are payable from net available cash flow, as defined in the Hope VI permanent loan agreement dated November 23, 1999 (the "Hope VI Agreement"). Pursuant to the Hope VI Agreement, the loan matures on November 23, 2054. The Authority and HUD have entered into an Urban Revitalization Demonstration Program Implementation Grant Agreement effective August 12, 1994 providing for a grant to be made by HUD to the Authority to assist in the financing of the construction of the project. Pursuant to the terms of the Hope VI Agreement, the Authority has loaned the funds to the Partnership as permanent financing for the project in order to repay the loan funded through the issuance of the bonds. The permanent loan is secured by a first leasehold deed of trust in favor of the Authority. As of December 31, 2009, the permanent loan principal balance was \$15,500,000. During 2009, accrued interest of \$100,000 was paid from contributions of the Investor Limited Partner. As of December 31, 2009, accrued interest was \$41,600.

ii. *Construction loan*

A construction loan of up to \$4,287,500 was provided by the Authority. Under the terms of the loan, interest shall accrue at 0.1%, compounded annually. Interest and principal are payable from net available cash flow, as defined in the loan agreement. The loan is secured by a second deed of trust on the project, and matures on November 23, 2054. As of December 31, 2009, the principal balance was \$4,273,120. As of December 31, 2009, accrued interest was \$35,857.

iii. *Predevelopment loan*

A predevelopment loan of \$2,465,501 was provided by the Authority. Under the terms of the loan, interest shall accrue at 0.1%, compounded annually. Interest and principal are payable from net available cash flow, as defined in the loan agreement. The loan is secured by a third deed of trust on the project and matures on November 23, 2054. As of December 31, 2009, the principal balance was \$334,640 and accrued interest was \$15,828.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE C - DISCRETELY PRESENTED COMPONENT UNITS (continued)

2. Hayes Valley Apartments, L.P. ("Partnership")

a. *Credit risk*

The Partnership maintains its cash in bank accounts, which, at times, may exceed federally insured limits. The Partnership has not experienced any losses in such accounts. The Partnership believes it is not exposed to any significant credit risk.

b. *Hope VI grant funds*

Pursuant to the Hope VI Grant and the Hope VI Plus Grant, the Partnership has utilized \$5,400,000 and \$150,000, respectively, of grant funds advanced by the Authority. Accordingly, construction costs have been reduced by \$5,550,000.

c. *Ground lease*

The Partnership has executed a ground lease agreement with the Authority. The agreement is subject to various use restrictions and operating requirements, as defined in the agreement, including the requirements that 51 of the units be continuously set aside for occupancy by public housing eligible households and 33 units that will not be reserved as public housing units be restricted for occupancy by tax credit eligible households. The terms of the agreement provide rent of \$10 per year throughout the 57-year term. Upon expiration of the agreement, all improvements, alterations, additions, equipment and fixtures shall become the property of the Authority without cost or charge.

d. *Long-term debt*

i. *Construction/permanent loan*

Construction and permanent financing is provided by the Authority under a loan commitment of \$1,600,000. The nonrecourse loan is secured by a second leasehold deed of trust on the property. The loan bears interest at an annual rate of 7.02%. At initial closing of the construction loan, the Partnership paid the Authority, solely from syndication proceeds, \$235,000 as prepaid interest. All further interest, and all principal, are payable only from net available cash flow of the project, or from Net Proceeds or Condemnation Proceeds, as defined in the loan agreement. Payments are applied first to accrued interest and then against outstanding principal. Unpaid accrued interest compounds annually and is added to principal at the end of each fiscal year. Interest expense amounted to \$188,852 in 2009 and total accrued interest added to principal amounted to \$1,279,050 at December 31, 2009. The loan matures on November 25, 2053.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE C - DISCRETELY PRESENTED COMPONENT UNITS (continued)

2. Hayes Valley Apartments, L.P. ("Partnership") (continued)

ii. *Mortgage note*

During 2008, a loan provided under a loan commitment of \$1,633,600 by Midland Loan Services was refinanced with Gershman Investment Corp. under a new loan commitment of \$1,601,300. The nonrecourse loan is insured by HUD under Section 221(d)(4) of the National Housing Act and is secured by a first deed of trust on the property. The loan bears interest at an annual rate of 6.5%. Monthly principal and interest payments amount to \$10,196. The balance of principal and interest, if any, remaining shall be due and payable January 1, 2038.

3. Hayes Valley Apartments II, L.P. ("Partnership")

a. *Credit risk*

The Partnership maintains its cash in bank accounts, which, at times, may exceed federally insured limits. The Partnership has not experienced any losses in such accounts. The Partnership believes it is not exposed to any significant credit risk.

b. *Hope VI grant funds*

Pursuant to the Hope VI Grant and the Hope VI Plus Grant, the Partnership has utilized \$3,326,000 and \$146,324, respectively, of grant funds advanced by the Authority. Accordingly, construction costs have been reduced by \$3,472,324.

c. *Ground lease*

The Partnership has executed a ground lease agreement with the Authority. The agreement is subject to various use restrictions and operating requirements, as defined in the agreement, including the requirements that 66 of the units be continuously set aside for occupancy by public housing eligible households and 44 units that will not be reserved as public housing units be restricted for occupancy by tax credit eligible households. The terms of the agreement provide rent of \$10 per year throughout the 57-year term. Upon expiration of the agreement, all improvements, alterations, additions, equipment and fixtures shall become the property of the Authority without cost or charge.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE C - DISCRETELY PRESENTED COMPONENT UNITS (continued)

3. Hayes Valley Apartments II, L.P. ("Partnership") (continued)

d. *Long-term debt*

i. *Mortgage loan*

Construction and permanent financing was originally provided by Midland Loan Services under a loan commitment of \$2,324,500. The nonrecourse loan was insured by HUD under Section 221(d)(4) of the National Housing Act and is secured by a first deed of trust on the property. The loan bore interest at an annual rate of 8.2%. Interest alone was payable monthly on the first day of January 1998, and on the first day of each month thereafter to and including May 1, 1999. Monthly principal and interest payments of \$16,512 began in June 1999. The balance of principal and interest, if any, remaining shall be due and payable on May 1, 2039. In May 2009, the mortgage note was refinanced with a new mortgage financing of \$2,297,200, provided by Gershman Investment Corp. The mortgage note remains insured by HUD, bears interest at an annual rate of 6.5%, and is secured by a security deed to the property. Beginning July 1, 2009, monthly principal and interest payments of \$14,520 are payable through June 1, 2039.

ii. *Authority loan*

Construction and permanent financing is also provided by the Authority under a loan commitment of \$3,250,000. The nonrecourse loan is secured by a second leasehold deed of trust on the property. The loan bore interest at an annual rate of 12% through December 31, 1998, and thereafter bears interest at an annual rate of 6.31%. At initial closing of the construction loan, the Partnership paid the Authority, solely from syndication proceeds, \$300,000 as prepaid interest. All further interest, and all principal, are payable only from net available cash flow of the project, or from net proceeds or condemnation proceeds, as defined in the loan agreement. Payments are applied first to accrued interest and then against outstanding principal; unpaid accrued interest compounds annually and is added to principal at the end of each fiscal year. Accrued interest added for the year ended December 31, 2009 amounted to \$329,356 and total accrued interest amounted to \$2,298,944 at December 31, 2009. The loan matures December 1, 2054.

4. Plaza East Associates, L.P. ("Partnership")

a. *Credit risk*

The Partnership maintains its cash in bank accounts, which, at times, may exceed federally insured limits. The Partnership has not experienced any losses in such accounts. The Partnership believes it is not exposed to any significant credit risk.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE C - DISCRETELY PRESENTED COMPONENT UNITS (continued)

4. Plaza East Associates, L.P. ("Partnership") (continued)

b. *Working capital reserve*

Plaza East Housing Corp. (a blended component unit of the Authority), the Managing General Partner, has advanced funds to the Partnership for the purpose of funding the Working Capital Reserve. The balance due at December 31, 2009 was \$165,000 and is included in other noncurrent liabilities on the balance sheet.

c. *Ground lease*

The Partnership has executed a 75-year ground lease agreement with the Authority. The agreement is subject to various use restrictions and operating requirements, as defined in the agreement, including the requirement that all 192 of the units be continuously set aside during the term of the Regulatory and Operating Agreement for occupancy by public housing eligible households. The terms of the agreement provide for rent of \$10 per year throughout the term of the regulatory agreement. Upon expiration of the agreement, all improvements, alterations, additions, equipment and fixtures shall become the property of the Authority without cost or charge.

d. *Long-term debt*

i. *Plaza East Housing Corporation note*

Construction and permanent financing is being provided by Plaza East Housing Corporation under a loan commitment of \$2,700,000. The nonrecourse loan is secured by a first leasehold deed of trust on the property. Interest accrued on the loan at an annual rate of 10% through December 31, 2001. Thereafter, interest accrues at an annual rate of 6.09%. At initial closing of the construction loan, the Partnership paid Plaza East Housing Corporation, solely from syndication proceeds, \$270,000 as prepaid interest. All further interest, and all principal, are payable only from net available cash flow of the project, or from net proceeds or condemnation proceeds, as defined in the loan agreement. Payments are applied first to accrued interest and then against outstanding principal; unpaid accrued interest compounds annually. Unpaid accrued interest added to principal at December 31, 2009 was \$1,696,274. The loan matures in September 2065.

Housing Authority of the City and County of San Francisco, California

Notes to Basic Financial Statements

September 30, 2010

NOTE C - DISCRETELY PRESENTED COMPONENT UNITS (continued)

4. Plaza East Associates, L.P. ("Partnership") (continued)

d. *Long-term debt (continued)*

ii. *SFHA Housing Corporation note*

Construction and permanent financing is also provided by SFHA Housing Corporation under a loan commitment of \$11,064,813. The nonrecourse loan is secured by a second leasehold deed of trust on the property. Interest accrued on the loan at an annual rate of 10% through December 31, 2001. No interest shall accrue on the loan thereafter. The Partnership paid SFHA Housing Corporation, from development sources other than public housing funds, \$443,000 for interest through December 31, 2001. All further interest, and all principal, are payable only from net available cash flow of the project, or from net proceeds or condemnation proceeds, as defined in the SFHA Loan Agreement. Payments are applied first to unpaid accrued interest, if any, and then against outstanding principal. Unpaid accrued interest at December 31, 2009 was \$380,230. The loan matures in September 2065.

REQUIRED SUPPLEMENTARY INFORMATION

The Housing Authority of the City and County of San Francisco, California

SCHEDULE OF PENSION AND OTHER POST EMPLOYMENT BENEFITS

Year ended September 30, 2010

Benefit Plan*	Actuarial Valuation Date	Actuarial Value of Assets (a)	Actuarial		Unfunded AAL (UAAL) (b-a)	Funded Ratio (a/b)	Estimated Covered Payroll (c)	UAAL as % of Covered Payroll ((b-a)/c)
			Accrued Liability (AAL) (b)	Liability (AAL)				
Pension	6/30/2007	\$ 84,422,007	\$ 87,184,213	\$ 2,762,206	97%	\$ 13,340,021	21%	
Pension	6/30/2008	\$ 89,076,261	\$ 92,061,114	\$ 2,984,853	97%	\$ 13,770,160	22%	
Pension	6/30/2009	\$ 91,597,742	\$ 97,692,648	\$ 6,094,906	94%	\$ 13,768,652	44%	
OPEB	6/30/2008	\$ -	\$ 12,022,086	\$ 12,022,086	0%	\$ 21,987,515	55%	
OPEB	9/30/2010	\$ -	\$ 14,182,116	\$ 14,182,116	0%	\$ 22,251,205	64%	

* While the annual required contribution (ARC) is calculated using the aggregate actuarial cost method. Information in this schedule is calculated using the entry age actuarial cost method as a surrogate for the funding progress of the Plan.

SUPPLEMENTAL INFORMATION

The Housing Authority of the City and County of San Francisco, California

FINANCIAL DATA SCHEDULE

Year ended September 30, 2010

FAA Code / FFE	FY 2010	Total AWP's	COCC Operating	Renovation and Rehabilitation - Subproject	Historic Preservation	Veterans Affairs - Housing	Housing Choice Voucher Program - Other	Subsidized	Section 8 Construction	Disaster - Repair and Rehabilitation	Disaster - Other	Community Development - Rental Units	Community Development - Other	Community Development - Rental Units	Community Development - Other	Capital and Shell - Rehabilitation	Capital and Shell - Construction	Section 8 - Rehabilitation	Section 8 - Construction	Capital and Shell - Rehabilitation	Capital and Shell - Construction	Total Primary Government	Total Current Line Items (Physical)	BEAC Fund (Public Government Utility)	
670000	Total Revenue	17,407,058	14,299,032	2,108,026	14,187	1,575,059	190,059,394	1,187	14,187	14,187	880	1,187	14,187	1,187	14,187	14,187	14,187	14,187	14,187	14,187	14,187	3,297,980	2,977,500	20,131,662	
710000	Other government grants	399,050	-	-	-	-	-	-	-	-	6,408,882	-	-	-	-	-	-	3,100,127	-	-	-	10,007,402	-	-	10,007,402
720000	Other income - Unrestricted	224,113	-	1,250,000	-	-	51,027	-	51,027	-	1,015	-	-	-	-	-	-	1,015	-	-	-	292,226	-	-	292,226
730000	Other income - Restricted	724,862	-	1,715	-	-	26,488	-	26,488	-	1,015	-	-	-	-	-	-	1,015	-	-	-	1,748,119	-	-	1,748,119
740000	Other income - Restricted	66,724,681	14,896,786	1,453,146	-	1,215,000	158,418,600	-	1,215,000	880	6,609,646	748,863	1,187	748,863	1,187	748,863	1,187	3,211,379	1,799,344	748,863	1,187	3,211,379	3,211,379	-	253,046,809
750000	Other income - Restricted	3,740,660	3,740,660	-	-	-	2,465,000	-	2,465,000	-	193,233	-	-	193,233	-	-	-	492,264	-	-	-	10,015,101	-	-	10,015,101
760000	Other income - Restricted	4,181,181	4,181,181	-	-	-	1,471,181	-	1,471,181	-	62,086	-	-	62,086	-	-	-	1,533,267	-	-	-	16,111,111	-	-	16,111,111
770000	Other income - Restricted	5,238,222	5,238,222	-	-	-	1,471,181	-	1,471,181	-	1,471,181	-	-	1,471,181	-	-	-	3,762,000	-	-	-	5,238,222	-	-	5,238,222
780000	Other income - Restricted	450,856	-	-	-	-	668,503	-	668,503	-	36,228	-	-	36,228	-	-	-	1,041,046	-	-	-	1,471,181	-	-	1,471,181
790000	Other income - Restricted	1,918,993	1,918,993	-	-	-	1,320,000	-	1,320,000	-	36,081	-	-	36,081	-	-	-	1,686,081	-	-	-	1,918,993	-	-	1,918,993
800000	Other income - Restricted	642,659	642,659	-	-	-	21,460	-	21,460	-	10,073	-	-	10,073	-	-	-	3,116	-	-	-	642,659	-	-	642,659
810000	Other income - Restricted	57,000	57,000	-	-	-	74,000	-	74,000	-	7,298	-	-	7,298	-	-	-	24,729	-	-	-	57,000	-	-	57,000
819200	Other income - Restricted	1,777,656	1,777,656	-	-	-	579,688	-	579,688	-	7,298	-	-	7,298	-	-	-	880,100	-	-	-	1,777,656	-	-	1,777,656
820000	Other income - Restricted	89,760	89,760	-	-	-	14,314	-	14,314	-	-	-	-	-	-	-	-	-	-	-	-	89,760	-	-	89,760
821000	Other income - Restricted	141,267	141,267	-	-	-	3,077	-	3,077	-	-	-	-	-	-	-	-	-	-	-	-	141,267	-	-	141,267
822000	Other income - Restricted	134,775	134,775	-	-	-	5,077	-	5,077	-	-	-	-	-	-	-	-	-	-	-	-	134,775	-	-	134,775
824000	Other income - Restricted	478,624	478,624	-	-	-	1,856	-	1,856	-	1,856	-	-	1,856	-	-	-	1,856	-	-	-	478,624	-	-	478,624
830000	Other income - Restricted	1,814,330	1,814,330	-	-	-	3,709	-	3,709	-	-	-	-	-	-	-	-	7,919	-	-	-	1,814,330	-	-	1,814,330
831000	Other income - Restricted	3,194,156	3,194,156	-	-	-	49,649	-	49,649	-	-	-	-	-	-	-	-	-	-	-	-	3,194,156	-	-	3,194,156
832000	Other income - Restricted	3,169	3,169	-	-	-	1,824	-	1,824	-	-	-	-	-	-	-	-	-	-	-	-	3,169	-	-	3,169
839000	Other income - Restricted	5,136,412	5,136,412	-	-	-	1,524	-	1,524	-	-	-	-	-	-	-	-	-	-	-	-	5,136,412	-	-	5,136,412
840000	Other income - Restricted	28,493	28,493	-	-	-	1,867,120	-	1,867,120	-	-	-	-	-	-	-	-	-	-	-	-	28,493	-	-	28,493
841000	Other income - Restricted	6,880,467	6,880,467	-	-	-	4,859	-	4,859	-	525	-	-	525	-	-	-	885	-	-	-	6,880,467	-	-	6,880,467
842000	Other income - Restricted	2,959,469	2,959,469	-	-	-	58,973	-	58,973	-	3,483	-	-	3,483	-	-	-	4,000	-	-	-	2,959,469	-	-	2,959,469
849000	Other income - Restricted	10,139,819	10,139,819	-	-	-	59,658	-	59,658	-	-	-	-	-	-	-	-	4,924	-	-	-	10,139,819	-	-	10,139,819
850000	Other income - Restricted	4,279,721	4,279,721	-	-	-	1,828	-	1,828	-	48	-	-	48	-	-	-	48	-	-	-	4,279,721	-	-	4,279,721
851000	Other income - Restricted	46,461	46,461	-	-	-	97,880	-	97,880	-	10,066	-	-	10,066	-	-	-	6,538	-	-	-	46,461	-	-	46,461
852000	Other income - Restricted	3,020,215	3,020,215	-	-	-	97,880	-	97,880	-	10,066	-	-	10,066	-	-	-	6,538	-	-	-	3,020,215	-	-	3,020,215
859000	Other income - Restricted	60,629	60,629	-	-	-	3,199	-	3,199	-	6,538	-	-	6,538	-	-	-	48	-	-	-	60,629	-	-	60,629
860000	Other income - Restricted	3,143,821	3,143,821	-	-	-	3,199	-	3,199	-	6,538	-	-	6,538	-	-	-	48	-	-	-	3,143,821	-	-	3,143,821

The Housing Authority of the City and County of San Francisco, California

SCHEDULE OF ACTUAL CAPITAL FUND PROGRAM COSTS AND ADVANCES

Year ended September 30, 2010

PROGRAM	CFP 2006	CFP 2007	CFP 2008	CFP 2009	CFP 2010	TOTAL
BUDGET	\$ 13,571,332	\$ 13,963,770	\$ 13,661,652	\$ 13,618,427	\$ 13,568,787	\$ 68,383,968
ADVANCES						
Cash receipts - prior years	\$ 13,223,471	\$ 10,211,306	\$ 10,681,248	\$ -	\$ -	\$ 34,116,025
Cash receipts - current year	347,861	2,443,759	2,069,860	10,577,793	-	15,439,273
Cumulative as of September 30, 2010	13,571,332	12,655,065	12,751,108	10,577,793	-	49,555,298
COSTS						
Prior years	13,339,729	11,370,369	12,028,521	1,286,034	-	38,024,653
Current year	231,603	1,949,844	646,115	10,777,425	-	13,604,987
Cumulative as of September 30, 2010	13,571,332	13,320,213	12,674,636	12,063,459	-	51,629,640
RECEIVABLE (PAYABLE) DUE FROM (TO) HUD	\$ -	\$ 665,148	\$ (76,472)	\$ 1,485,666	\$ -	\$ 2,074,342
SOFT COSTS						
Prior years	\$ 6,707,779	\$ 6,736,669	\$ 6,482,167	\$ 1,430	\$ -	\$ 19,928,045
Current year	-	302,797	296,595	6,643,864	-	7,243,256
Cumulative as of September 30, 2010	6,707,779	7,039,466	6,778,762	6,645,294	-	27,171,301
HARD COSTS						
Prior years	6,631,950	4,633,700	5,546,354	1,284,604	-	18,096,608
Current year	231,603	1,647,047	349,520	4,133,561	-	6,361,731
Cumulative as of September 30, 2010	6,863,553	6,280,747	5,895,874	5,418,165	-	24,458,339
CUMULATIVE HARD AND SOFT COSTS	\$ 13,571,332	\$ 13,320,213	\$ 12,674,636	\$ 12,063,459	\$ -	\$ 51,629,640

The following RHF grants have been awarded and are unspent as of September 30, 2010:

CFP 2006 RHF	\$ 230,070
CFP 2007 RHF	452,443
CFP 2008 RHF	461,179
CFP 2009 RHF	232,064
CFP 2010 RHF	235,123
	<u>\$ 1,610,879</u>

The Housing Authority of the City and County of San Francisco, California

SCHEDULE OF ACTUAL CAPITAL FUND STIMULUS RECOVERY ACT FUNDED PROGRAM COSTS AND ADVANCES

Year ended September 30, 2010

PROGRAM	CA39S001 501-09	CA001 00095509R		CA001 00095609R		CA001 00095709E		TOTAL
		STIMULUS FORMULA	STIMULUS COMPETITIVE	STIMULUS COMPETITIVE	STIMULUS COMPETITIVE	STIMULUS COMPETITIVE	STIMULUS COMPETITIVE	
BUDGET	\$ 17,876,716	\$ 8,502,006	\$ 3,995,994	\$ 2,780,755	\$ 15,278,755			
ADVANCES								
Cash receipts - prior years	\$ -	\$ -	\$ -	\$ -	\$ -			
Cash receipts - current year	9,089,661	-	-	-	-			
Cumulative as of September 30, 2010	9,089,661	-	-	-	-			
COSTS								
Prior years	3,654,736	-	-	-	-			
Current year	7,424,322	-	-	109,108	109,108			109,108
Cumulative as of September 30, 2010	11,079,058	-	-	109,108	109,108			109,108
RECEIVABLE DUE FROM HUD	\$ 1,989,397	\$ -	\$ -	\$ 109,108	\$ 109,108			\$ 109,108
SOFT COSTS								
Prior years	\$ 332,249	\$ -	\$ -	\$ -	\$ -			\$ -
Current year	784,046	-	-	-	-			-
Cumulative as of September 30, 2010	1,116,295	-	-	-	-			-
HARD COSTS								
Prior years	3,322,487	-	-	-	-			-
Current year	6,640,276	-	-	109,108	109,108			109,108
Cumulative as of September 30, 2010	9,962,763	-	-	109,108	109,108			109,108
CUMULATIVE HARD AND SOFT COSTS	\$ 11,079,058	\$ -	\$ -	\$ 109,108	\$ 109,108			\$ 109,108

SINGLE AUDIT SECTION

The Housing Authority of the City and County of San Francisco, California

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS AND LOCAL ASSISTANCE

Year ended September 30, 2010

Federal Grantor/Pass-Through Grantor/ Program or Cluster Title	CFDA Number	Federal Expenditures
FEDERAL AWARDS		
<u>Direct from the U.S. Department of Housing and Urban</u>		
<u>Development ("HUD"):</u>		
Section 8 Housing Choice Voucher Program	14.871	\$ 121,404,333
Low Rent Public Housing Program	14.850	34,322,202
Public Housing Capital Fund Program	14.872	13,604,987
Section 8 Moderate Rehabilitation Program	14.856	9,288,896
Capital Fund Stimulus Formula Recovery Act Funded	14.885	7,424,322
Capital Fund Stimulus Competitive Recovery Act Funded	14.884	109,108
Community Development Block Grants/Technical Assistance Program	14.227	742,663
Disaster Housing Assistance Grant	97.109	830
		<u>186,897,341</u>
<u>Pass through from the City and County of San Francisco</u>		
Shelter Plus Care	14.238	6,498,052
Housing Opportunities for Persons with AIDS	14.241	3,230,322
		<u>196,625,715</u>
TOTAL EXPENDITURES OF FEDERAL AWARDS		
Grant from the Redevelopment Agency of the City and County of San Francisco		<u>369,028</u>
TOTAL EXPENDITURES OF FEDERAL AWARDS AND LOCAL ASSISTANCE		
		<u><u>\$ 196,994,743</u></u>

Housing Authority of the City and County of San Francisco, California

NOTE TO THE SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
AND LOCAL ASSISTANCE

Year ended September 30, 2010

NOTE 1 - BASIS OF PRESENTATION

The accompanying schedule of expenditures of federal awards and local assistance includes the federal grant activity of the Housing Authority of the City and County of San Francisco, California and is presented on the accrual basis of accounting. The information on this schedule is presented in accordance with the requirements of OMB Circular A-133, *Audits of States, Local Governments and Non-Profit Organizations*. Therefore, some amounts presented in this schedule may differ from amounts presented in, or used in the preparation of, the basic financial statements.

In accordance with HUD regulations, HUD considers the Annual Budget Authority for the Section 8 Housing Choice Voucher program ("HCV") and the Veterans Affairs Supportive Housing program ("VASH"), both CFDA No. 14.871, to be considered an expenditure for the purposes of this schedule. Therefore, the amount in this schedule is the total amount received directly from HUD and not the total expenditures paid by the Authority. The \$121,404,333 total for CFDA No. 14.871, as presented above, consists of \$120,029,294 from HCV and \$1,375,039 from VASH.



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**REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON
COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF
FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE
WITH GOVERNMENT AUDITING STANDARDS**

To the Board of Commissioners
Housing Authority of the City and County of San Francisco, California
San Francisco, California

We have audited the financial statements of the business-type activities and the aggregate discretely presented component units of the Housing Authority of the City and County of San Francisco, California (the "Authority"), as of and for the year ended September 30, 2010, which collectively comprise the Authority's basic financial statements and have issued our report thereon dated June 29, 2011. Our report was modified to include a reference to other auditors. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Other auditors audited the financial statements of the Authority's following discretely presented component units: Hayes Valley Apartments L.P., Hayes Valley Apartments II, L.P., Plaza East Associates, L.P., and Bernal Housing Associates, L.P., as described in our report on the Authority's financial statements. The financial statements of these entities were not audited in accordance with *Government Auditing Standards*.

Internal Control Over Financial Reporting

In planning and performing our audit, we considered the Authority's internal control over financial reporting as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of the Authority's internal control over financial reporting.

Our consideration of internal control over financial reporting was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control over financial reporting that might be significant deficiencies or material weaknesses and therefore, can be no assurance that all deficiencies, significant deficiencies, or material weaknesses have been identified. However, as described in the accompanying schedule of findings and questioned costs, we identified certain deficiencies in internal control over financial that we consider to be material weaknesses.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A material weakness is a deficiency, or combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. We consider the deficiency described in the accompanying schedule of findings and questioned costs to be a material weakness, finding 10-1.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Authority's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

We noted certain matters that we reported to management of the Authority in a separate letter dated June 29, 2011.

The Authority's response to the findings identified in our audit is described in the accompanying corrective action plan. We did not audit the Authority's response and, accordingly, we express no opinion on it.

This report is intended solely for the information and use of management, the Board of Commissioners, and federal awarding agencies and pass-through entities and is not intended to be and should not be used by anyone other than these specified parties.

June 29, 2011
Melbourne, Florida

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REPORT ON COMPLIANCE WITH REQUIREMENTS THAT COULD HAVE A DIRECT AND MATERIAL EFFECT ON EACH MAJOR PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE IN ACCORDANCE WITH OMB CIRCULAR A-133

Board of Commissioners
Housing Authority of the City and County of San Francisco, California
San Francisco, California

Compliance

We have audited the Housing Authority of the City and County of San Francisco, California's (the "Authority") compliance with the types of compliance requirements described in the OMB Circular A-133 *Compliance Supplement* that could have a direct and material effect on each of the Authority's major federal programs for the year ended September 30, 2010. The Authority's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs. Compliance with the requirements of laws, regulations, contracts and grants applicable to each of its major federal programs is the responsibility of the Authority's management. Our responsibility is to express an opinion on the Authority's compliance based on our audit.

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. Those standards and OMB Circular A-133 require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the Authority's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances. We believe that our audit provides a reasonable basis for our opinion. Our audit does not provide a legal determination of the Authority's compliance with those requirements.

As described in items 10-3, 10-4, 10-5, 10-6 and 10-7 in the accompanying schedule of findings and questioned costs, the Authority did not comply with the requirements regarding Eligibility, Allowable Activities/Costs, and certain Special Tests and Provisions (Housing Quality Standards Inspections, Housing Quality Standards Enforcement and the Waiting List) that are applicable to its Section 8 Housing Choice Voucher program. Compliance with such requirements is necessary, in our opinion, for the Authority to comply with the requirements to that program.

In our opinion, because of the effects of the noncompliance described in the preceding paragraph, the Authority did not comply, in all material respects, with the requirements referred to above that could have a direct and material effect on the Section 8 Housing Choice Voucher program.

As described in items 10-2 and 10-6 in the accompanying schedule of findings and questioned costs, the Authority did not comply with the requirements regarding Eligibility and Special Tests and Provisions (the Waiting List) that are applicable to its Low Rent Public Housing program. Compliance with such requirements is necessary, in our opinion for the Authority to comply with the requirements applicable to that program.

In our opinion, except for the noncompliance described in the preceding paragraphs, the Authority complied, in all material respects, with the compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended September 30, 2010.

Internal Control Over Compliance

Management of the Authority is responsible for establishing and maintaining effective internal control over compliance with requirements of laws, regulations, contracts and grants applicable to federal programs. In planning and performing our audit, we considered the Authority's internal control over compliance with the requirements that could have a direct and material effect on a major federal program to determine the auditing procedures for the purpose of expressing our opinion on compliance and to test and report on internal control over compliance in accordance with OMB Circular A-133, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the Authority's internal control over compliance.

Our consideration of internal control over compliance was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control over compliance that might be significant deficiencies or material weaknesses and therefore, there can be no assurance that all deficiencies, significant deficiencies or material weaknesses have been identified. However, as discussed below, we identified certain deficiencies in internal control over compliance that we consider to be material weaknesses.

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A material weakness in internal control over compliance is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. We consider the deficiencies in internal control over compliance described in the accompanying schedule of findings and questioned costs as items 10-2, 10-3, 10-5, 10-6 and 10-7 to be material weaknesses.

The Authority's response to the findings identified in our audit is described in the accompanying corrective action plan. We did not audit the Authority's response and, accordingly, we express no opinion on it.

This report is intended solely for the information and use of the Board of Commissioners, management, others within the Authority, and federal awarding agencies and pass-through entities and is not intended to be and should not be used by anyone other than these specified parties.

June 29, 2011
Melbourne, Florida

Berman Hopkins Wright & LaHam
CPAs and Associates, LLP

Housing Authority of the City and County of San Francisco, California

SCHEDULE OF FINDINGS AND QUESTIONED COSTS

September 30, 2010

A. SUMMARY OF AUDITORS' RESULTS

Financial Statements

Type of auditors' report issued: **Unqualified**

Internal control over financial reporting:

Material weakness identified? **Yes (10-1)**

Significant deficiency identified that is not considered to be a material weakness? **No**

Noncompliance material to financial statements noted? **No**

Federal Awards

Internal control over major programs:

Material weakness identified? **Yes (10-2, 10-3, 10-5, 10-6, and 10-7)**

Significant deficiency identified that is not considered to be a material weakness? **No**

Type of auditors' report issued on compliance for major programs:

- **Low Rent Public Housing - Qualified (10-2 and 10-6)**
- **Section 8 Housing Choice Voucher Program - Adverse (10-3, 10-4, 10-5, 10-6, and 10-7)**
- **Housing Opportunities for Persons with AIDS - Unqualified**

Audit findings that are required to be reported in accordance with section 510(a) of Circular A-133 are included in this schedule.

The programs tested as major programs are as follows:

Low Rent Public Housing - CFDA Number 14.850

Section 8 Housing Choice Voucher Program - CFDA Number 14.871

Housing Opportunities for Persons with AIDS - CFDA Number 14.241

The threshold for distinguishing types A and B programs was **\$3,000,000**

Did the auditee qualify as a low-risk auditee? **No**

Housing Authority of the City and County of San Francisco, California

SCHEDULE OF FINDINGS AND QUESTIONED COSTS

September 30, 2010

B. FINDINGS - FINANCIAL STATEMENTS AUDIT

10-1 Financial Reporting

Material Weakness in Internal Control

Condition: The current audit for the year end September 30, 2010, included several material adjustments, which collectively are identified as a material weakness in accordance with the Statement on Auditing Standards No. 115 ("SAS 115"). There were certain items which should have been detected in the processing and recording of financial information.

Criteria: In accordance with SAS 115, these material adjustments should be considered a material weakness because it has a material impact to the financial statements.

Effect: The financial information originally reported was materially misstated and numerous audit adjustments were necessary.

Cause: During the year, the Authority converted to new accounting software which required a certain amount of dedicated time and effort. Controls were not in place to ensure the proper recording of all financial information in a timely and accurate manner.

Auditors' Recommendation: We recommend that the Authority perform a review of invoices after year end to ensure that all liabilities are properly reported. Furthermore, timely reconciliations of credit cards and bank reconciliations of outstanding items are needed on a timely basis.

Housing Authority of the City and County of San Francisco, California

SCHEDULE OF FINDINGS AND QUESTIONED COSTS

September 30, 2010

C. FINDINGS AND QUESTIONED COSTS - MAJOR FEDERAL AWARD PROGRAMS

10-2 Eligibility

Low Rent Public Housing, CFDA Number 14.850

Material Weakness in Internal Control

Material Noncompliance

Condition: Out of a total tenant population of approximately 5,764 tenant files, 60 files were tested and the following deficiencies were noted:

- 4 files did not have annual recertifications completed timely,
- 1 file was missing the flat rent option form,
- 7 files did not properly include and then exclude food stamps,
- 2 files had incorrect calculations of income,
- 1 file lacked independent third party verification of income,
- 7 files lacked proper birth certificates or social security cards, and
- 1 file did not have a signed U.S. citizen declaration.

Criteria: 24 CFR 960.259 requires the Authority to obtain and document third party verification of income and other factors that affect the determination of rent. 24 CFR 982.516. requires internal controls be in place to ensure compliance with HUD requirements, as well as, complete and accurate tenant records.

Effect: The Authority could be charging the incorrect amount of rent or could be housing ineligible tenants.

Cause: The Authority did not implement or does not have procedures and controls in place to ensure proper compliance with regards to tenant eligibility requirements, rent calculations and third party verifications.

Auditors' Recommendation: The Authority needs to correct the deficiencies noted in the tested files and perform a quality control review of a larger sample of the population. In addition, the Authority should develop procedures, systems and controls to ensure proper compliance with regards to tenant eligibility requirements, income calculations and third party verifications. In addition, staff needs to be continually trained in regards to the rules and regulations to properly administer eligibility.

Housing Authority of the City and County of San Francisco, California

SCHEDULE OF FINDINGS AND QUESTIONED COSTS

September 30, 2010

C. FINDINGS AND QUESTIONED COSTS - MAJOR FEDERAL AWARD PROGRAMS
(continued)

10-3 **Eligibility**

Section 8 Housing Choice Voucher Program, CFDA Number 14.871

Material Weakness in Internal Control

Material Noncompliance

Condition: Out of a total tenant population of approximately 7,326 tenant files, 38 files were tested and the following deficiencies were noted:

- 3 files requested to be tested were unable to be located by the Authority,
- 13 files did not have annual recertifications completed during the year,
- 2 files did not have annual recertifications completed timely,
- 1 file did not have a signed U.S. citizen declaration,
- 1 file lacked proper birth certificates and social security cards,
- 9 files had incorrect utility allowances,
- 1 file had incorrect calculation of income,
- 2 files were missing third party verification of income,
- 1 file did not properly report third party verification of assets,
- 1 file did not properly include and then exclude food stamps,
- 8 files did not have inspections completed timely, and
- 1 file had incorrect HAP payments.

Criteria: 24 CFR 982.516 requires internal controls to be in place to ensure compliance with HUD requirements, as well as, complete and accurate tenant files. The Authority's administrative plan also requires following proper procedures for determination of HAP and verification of income.

Effect: The Authority is not in compliance with HUD requirements regarding eligibility and tenant recertifications, which could result in incorrect HAP payments to landlords.

Cause: Procedures to ensure compliance with HUD requirements are not being followed.

Auditors' Recommendations: The Authority needs to correct the deficiencies noted in the tested files and consider the impact of our results over the entire population. In addition, the Authority should develop procedures, systems and controls to ensure proper compliance with regards to tenant eligibility requirements, income calculations and third party verifications. In addition, staff needs to be continually trained in regards to the rules and regulations to properly administer eligibility. Some of the items above raise an additional concern, such as the incorrect HAP payments and the files that could not be located for inspection, as it could be an indicator of unallowed HAP payments.

Housing Authority of the City and County of San Francisco, California

SCHEDULE OF FINDINGS AND QUESTIONED COSTS

September 30, 2010

C. FINDINGS AND QUESTIONED COSTS - MAJOR FEDERAL AWARD PROGRAMS
(continued)

10-4 **Allowable Activities/Costs**

Section 8 Housing Choice Voucher Program, CFDA Number 14.871
Veterans Affairs Supportive Housing Program, CFDA 14.871 - non-major program
Material Noncompliance

Condition: It was noted that as of September 30, 2010, the Authority did not have any cash on hand to cover the restricted VASH reserves of \$1,958,596, as required by 24 CFR 982.157.

In prior years and the current year, the Authority loaned Section 8 Housing Choice Voucher and VASH program funds to other Authority programs. Per the requirements of 24 CFR 982.157, the interprogram borrowings are not allowed. As of September 30, 2010, the balance due to the Section 8 Housing Choice Voucher program was \$2,556,931 and the balance due to the VASH program was \$1,958,596.

Criteria: In accordance with 24 CFR 982.157, the Authority must maintain a system to ensure that the Authority will be able to make housing assistance payments for all participants within the amounts contracted. In addition, program receipts may only be used for housing assistance payments and administrative fees.

Questioned Costs: \$4,515,527

Effect: The Authority does not have sufficient cash available to cover the restricted reserves of housing assistance payment equity. The Authority is also not in compliance with HUD requirements to only use program receipts for housing assistance payments and administrative fees.

Auditors' Recommendation: We recommend that the Authority maintain funds sufficient to cover the restricted reserves of housing assistance payment equity. In addition, we recommend that the Authority use Section 8 Housing Choice Voucher and VASH program funding in accordance with 24 CFR 982.157.

10-5 **Special Tests and Provisions - Housing Quality Standards Inspections**

Section 8 Housing Choice Voucher Program, CFDA Number 14.871
Material Weakness in Internal Control
Material Noncompliance

Condition: During our testing of Housing Quality Standards ("HQS") inspections, we noted that out of the 40 inspections sampled, the Authority was unable to provide the actual inspection forms for 25 of the tenants selected. Of the 25 samples the Authority was unable to provide actual inspections for; the Authority provided us with inspection letters to the residents stating that an inspection had been performed for 18 of the samples, with the Authority unable to provide any documentation for 7 of the tenants selected.

Housing Authority of the City and County of San Francisco, California

SCHEDULE OF FINDINGS AND QUESTIONED COSTS

September 30, 2010

C. FINDINGS AND QUESTIONED COSTS - MAJOR FEDERAL AWARD PROGRAMS
(continued)

10-5 Special Tests and Provision - Housing Quality Standards Inspections (continued)

Criteria: In accordance with 24 CFR 982.405, the Authority must inspect the unit leased to a family prior to the initial term of the lease, at least annually during assisted occupancy and at other times as needed, to determine if the unit meets the HQS.

Effect: The Authority is not in compliance with the HUD requirements regarding HQS inspections, which could result in tenants living in unsafe units.

Cause: The Authority does not have controls in place to ensure that HQS inspections are being performed in a timely manner.

Auditors' Recommendation: We recommend that the Authority develop procedures, systems and controls to ensure proper compliance and documentation with regards to HQS inspections. All inspections need to be maintained for proof of inspection, the letters to the resident regarding the inspections is not sufficient proof of inspections.

10-6 Special Tests and Provisions - Waiting List

Low Rent Public Housing, CFDA Number 14.850

Section 8 Housing Choice Voucher Program, CFDA Number 14.871

Material Weakness in Internal Control

Material Noncompliance

Condition: We were unable to properly test the waiting list for the Low Rent Public Housing and Section 8 Housing Choice Voucher programs. The Authority was unable to provide us with sufficient documentation to perform our tests of the waiting list.

Criteria:

- In accordance with 24 CFR Part 5, Subparts E and F, Part 945 and 960.201 through 960.215, the Authority should follow the policies and procedures documented in its Admissions and Continued Occupancy Policy ("ACOP") for selecting applicants from the waiting list.
- In accordance with 24 CFR Part 5, Subparts E and F, and Part 982.204, the Authority must maintain information that permits the Authority to select participants from the waiting list in accordance with the Authority's Section 8 Administrative Plan.

Effect: It could not be determined that the Authority is housing applicants in the proper order on the waiting list.

Cause: The Authority was unable to provide sufficient documentation to ensure the waiting list is properly maintained and conforms to the required standards.

Auditors' Recommendation: The Authority should implement systems and controls to adequately maintain a waiting list that ensures applicants are housed, or given the opportunity to be housed in the proper order. The Authority should print the waiting list to an electronic file each month to ensure that documentation exists.

Housing Authority of the City and County of San Francisco, California

SCHEDULE OF FINDINGS AND QUESTIONED COSTS

September 30, 2010

C. FINDINGS AND QUESTIONED COSTS - MAJOR FEDERAL AWARD PROGRAMS
(continued)

10-7 Special Tests and Provisions - HQS Enforcement

Section 8 Housing Choice Voucher Program, CFDA Number 14.871

Material Weakness in Internal Control

Material Noncompliance

Condition: During our testing of HQS Enforcement, we were provided a list of approximately 100 units who were under abatement status as of September 30, 2010. Out of the 6 units selected for testing, 3 of the files showed that no abatement of Housing Assistance Payments ("HAP") had taken place. In addition, one of the files selected was on abatement even though there was a passed inspection in the file.

Criteria: In accordance with 24 CFR 982.619, the Authority may not make any housing assistance payments if the contract unit does not meet the HQS, unless any defect is corrected within the required period specified by the Authority and the Authority verifies the correction.

Effect: The Authority may be paying HAP to landlords whose units have failed HQS standards. Secondly, the Authority may be incorrectly withholding HAP payments to landlords who passed the most recently completed inspection.

Cause: The Authority does not have controls in place to ensure that HQS is being enforced and that abatements are being handled properly.

Auditors' Recommendation: We recommend that the Authority develop proper procedures and strengthen internal controls relating to HQS inspections and any applicable abatements. A list of failed re-inspections should be regularly reviewed to verify that units that have failed are having HAP properly abated and those that have passed re-inspection are properly taken off of abatement.

Housing Authority of the City and County of San Francisco, California

SUMMARY SCHEDULE OF PRIOR YEAR AUDIT FINDINGS

September 30, 2010

SUMMARY SCHEDULE OF PRIOR YEAR AUDIT FINDINGS

09-1 Condition: During the review and testing of 25 payroll samples, it was noted 3 instances where temporary employees did not have temporary employment contracts on file for the extension period of temporary employment with the Authority.

Auditors' Recommendation: It is recommended that management strengthen its procedures of monitoring the employment period of temporary employees and updating temporary employment contracts, as necessary.

Current Year Status: Cleared.

09-2 Condition: During the testing of collectability of tenant accounts receivable, the following was noted:

- Numerous high balance receivables (over \$1,000) that have been long overdue or delinquent for over 12 months;
- 3 instances where a tenant who entered into a repayment agreement with the Authority either by court stipulation or in-house stipulation did not comply with the such agreement and no further action was done by the Authority; and
- 18 instances where the tenant who has an outstanding rent balance was neither in legal nor entered into a repayment agreement with the Authority.

Auditors' Recommendation: It is recommended that management take the following actions to improve tenants' accounts receivable collection:

- Update the Rent Collections Policy and Procedures to align with the Authority's experience with handling tenants that are subject to stipulation agreements or eviction procedures; and
- Strict adherence by the Authority to the Updated Rent Collections Policy and Procedures.

Current Year Status: Reported as a management comment in fiscal year 2010.

Housing Authority of the City and County of San Francisco, California

SUMMARY SCHEDULE OF PRIOR YEAR AUDIT FINDINGS

September 30, 2010

SUMMARY SCHEDULE OF PRIOR YEAR AUDIT FINDINGS (continued)

09-3 Condition: During the review of testing of 40 Conventional Housing tenant files for continued occupancy, the following was noted:

- 3 instances where the authorization for the release of information was not on file;
- 1 instance where the authorization for the release of information was not signed by the tenant;
- 5 instances where the 3rd party verification of income was not performed;
- 5 instances where the rent calculation worksheet was not on file;
- 5 instances where the rent calculation was incorrect;
- 6 instances where the annual recertification was not performed within the HUD-mandated 12-month timeframe;
- 2 instances where the tenant was over-housed; and
- 1 instance where data input on the Form HUD-50058 was entered as annual recertification instead of interim recertification.

Auditors' Recommendation: It is recommended that management take the following actions to ensure compliance with HUD regulations:

- Strengthen its file retention procedures to ensure that all essential documents are properly retained in files;
- Strengthen its procedures for performing timely annual tenant re-examinations and documenting those re-examinations through a complete set of documents obtained from the tenant and/or other sources;
- Strengthen its procedures over tenant income calculations during annual or interim re-examinations; and
- Training and retraining of eligibility workers to ensure that they understand the significance of compliance with the eligibility requirements of the Conventional Housing Program.

Current Year Status: Repeated, see Finding 10-2.

09-4 Condition: During the review and testing of 20 admissions from the Conventional Housing waiting list, the following was noted:

- 1 instance where the application for Conventional Housing was not on file;
- 1 instance where the application for Conventional Housing was not entered in a timely manner;
- 1 instance where the income verification used for rent calculation was 145 days old;
- 1 instance where the rent calculation worksheet was not on file;
- 1 instance where an applicant was housed using an incorrect priority of admission from the waiting list; and
- Numerous inactive/already housed applicants were not purged from the waiting list making it unnecessarily long.

Housing Authority of the City and County of San Francisco, California

SUMMARY SCHEDULE OF PRIOR YEAR AUDIT FINDINGS

September 30, 2010

SUMMARY SCHEDULE OF PRIOR YEAR AUDIT FINDINGS (continued)

Auditors' Recommendation: It is recommended that management take the following actions for complying with HUD regulations:

- Strengthen its file retention procedures to ensure that all essential documents are properly completed and retained in files;
- Strengthen its procedures over timely input of applicant's information into the waiting list;
- Adhere to policies on tenant selection and placement of new tenants on the waiting list; and
- Periodically review, update, and purge the waiting list database.

Current Year Status: Repeated, see Finding 10-6.

09-5 Condition: The Authority has no certification for Section Eight Management Assessment Program ("SEMAP") for fiscal year 2009.

Auditors' Recommendation: The Authority needs HUD representatives to schedule and complete a confirmatory review in order to remove the "Troubled Agency" status.

Current Year Status: HUD did not require SEMAP in 2010 due to recent results of the 2009 RIM review.

09-6 Condition: During the review and testing of 40 Section 8 Housing Assistance Payments ("HAP") and related tenant files, the following was noted:

- 6 instances where the required annual re-examination was not performed within the HUD mandated 12-month timeframe;
- 2 instances where the annual Housing Quality Standards ("HQS") inspection was not performed timely;
- 1 instance where Authorization for the Release of Information, Statement of Understanding, Statement of Family Obligation and Grounds for Termination were not on file;
- 2 instances where the tenant's rent was incorrectly calculated;
- 3 instances where the tenant's file was not available for review; and
- 3 instances where the inspection file was not available for review.

Auditors' Recommendation: It is recommended that management take the following actions for complying with HUD regulations for Section 8 Program administration:

- Strengthen its administrative procedures over annual or interim unit inspections; and
- Strengthen its procedures for performing timely annual tenant re-examinations and documenting those re-examinations through a complete set of documents obtained from the tenant and/or other sources.

Current Year Status: Repeated, see Finding 10-3.

Housing Authority of the City and County of San Francisco, California

SUMMARY SCHEDULE OF PRIOR YEAR AUDIT FINDINGS

September 30, 2010

SUMMARY SCHEDULE OF PRIOR YEAR AUDIT FINDINGS (continued)

09-7 Condition: During the review and testing of the Utility Allowance Schedule ("UAS") that was effective September 14, 2009, the following was noted:

- Other Electric allowance rate for 5-bedroom unit was not properly calculated;
- Domestic Water Heating allowance rates for 4 and 5-bedroom units were not properly calculated;
- Space Heating - Natural Gas allowance rates for all types of units were not properly calculated; and
- Space Heating - Electric allowance rates for all types of units were not properly calculated.

Auditors' Recommendation: It is recommended that management strengthen review procedures to ensure the accuracy of UAS.

Current Year Status: Repeated, see Finding 10-3.

09-8 Condition: The review and test of the 10 samples selected for Housing Quality Standards Inspections ("HQS") and Quality Control Re-inspections ("QCR") was not able to be completed. In addition, the total number of QCR inspections performed by the Authority for fiscal year 2009 did not exceed the 5% inspection threshold of total housing vouchers.

Auditors' Recommendation: It is recommended that management perform the following:

- Strengthen its file retention procedures to ensure that all essential documents are properly completed and retained in files; and
- Conduct HQS/QCRs in a timely manner to ensure fulfillment of the minimum threshold for HQS and QCRs.

Current Year Status: Repeated, see Finding 10-5.

09-9 Condition: During the review and testing of 5 abatement files in the Section 8 program, the following was noted:

- 4 instances where HAP was not abated in a timely or an accurate manner;
- 1 instance where the Authority failed to locate the inspection report; and
- 4 instances where the Authority failed to locate the notification of change forms.

Auditors' Recommendation: It is recommended that management strengthen its abatement procedures to ensure that HQS deficiencies are corrected in a timely manner by the landlord.

Current Year Status: Repeated, see Finding 10-7.

Housing Authority of the City and County of San Francisco, California

SUMMARY SCHEDULE OF PRIOR YEAR AUDIT FINDINGS

September 30, 2010

SUMMARY SCHEDULE OF PRIOR YEAR AUDIT FINDINGS (continued)

09-10 Condition: During the review and testing of 20 admissions from the Section 8 waiting list, the following was noted:

- 15 instances where the entire tenant file was missing;
- 3 instances where the preference point was not supported;
- 1 instance where tenant income information used to compute HAP was outdated;
- 20 instances where the rankings of samples were significantly lower compared to the previous months report; and
- 4 instances where inactive applicants (already housed or no longer qualified) were not purged from the waiting list.

Auditors' Recommendation: It is recommended that management perform the following:

- Strengthen its file retention procedures to ensure that all essential documents are properly completed and retained in files; and
- Conduct system review of the ranking of a sample of applicants to ensure that ranking in the waiting list database is proper.

Current Year Status: Repeated, see Finding 10-6.

09-11 Condition: During the review and testing of 10 Family Self-Sufficiency ("FSS") files, the following was noted:

- 2 instances where the FSS family escrow balances were not updated in accordance with their contract status;
- 10 instances where the Authority failed to apply correct interest rates for 6 months and did not enter interest rates to CCS for 3 months; and
- 1 instance where forfeited escrow account balances was not recorded in the general ledger in a timely manner.

Auditors' Recommendation: It is recommended that management establish an effective communication between the FSS Program Manager and the Finance department in order to timely communicate the correct interest rate for FSS calculation purposes.

Current Year Status: Reported as a management comment in fiscal year 2010.

09-12 Condition: During the review and testing of 10 Housing Opportunities for Persons with AIDS ("HOPWA") files, one instance was noted where HAP was overstated by \$167.

Auditors' Recommendation: It is recommended that management strengthen its procedures reviewing tenants' annual re-examination prepared by staff.

Current Year Status: Cleared.



SAN FRANCISCO HOUSING AUTHORITY

EXECUTIVE OFFICE

1815 EGBERT AVE • SAN FRANCISCO, CA 94124
PHONE: (415) 715-3284 • FAX (415) 715-5233

CORRECTIVE ACTION PLAN

June 29, 2011

U.S. Department of Housing and Urban Development

The Housing Authority of the City and County of San Francisco respectfully submits the following corrective action plan for the year ended September 30, 2010.

Name and Address of independent public accounting firm:
Berman Hopkins Wright & LaHam, CPAs and Associates, LLP
8035 Spyglass Hill Road
Melbourne, FL 32940

Audit period:

The findings from the September 30, 2010 schedule of findings and questioned costs are discussed below. The findings are numbered consistently with the numbers assigned in the schedule.

10-1 Financial Reporting

Material Weakness in Internal Control

Auditors' Recommendation: We recommend that the Authority perform a review of invoices after year end to ensure that all liabilities are properly reported. Furthermore, timely reconciliations of credit cards and bank reconciliations of outstanding items are needed on a timely basis.

Action Taken: The Authority has existing procedures in place whereby all liabilities are accounted for at year-end and credit cards and bank reconciliations of outstanding items are recorded timely. We will strengthen enforcements of these procedures to prevent the occurrence of the incidents noted in this finding.

The person responsible for the implementation of this action plan in accordance with OMB A-133 Section 315 (c) is Virgilio E. Chua, Accounting Manager, and the anticipated completion date is September 30, 2011.

10-2 Eligibility

Low Rent Public Housing, CFDA Number 14.850

Material Weakness in Internal Control

Material Noncompliance

Auditors' Recommendation: The Authority needs to correct the deficiencies noted in the tested files and perform a quality control review of a larger sample of the population. In

addition, the Authority should develop procedures, systems and controls to ensure proper compliance with regards to tenant eligibility requirements, rent calculations and third party verifications. In addition, staff needs to be continually trained in regards to the rules and regulations to properly administer eligibility.

Action Taken:

The Authority has established a quality control procedure to address this issue wherein 5 percent of tenant files are reviewed by the quality control team. This review procedure was developed by a reputable consulting company that assists public housing authorities in their operational needs to meet regulatory guidelines. This company is currently in the process of completing its quality control review for the third quarter of the fiscal year 2011.

The person responsible for the implementation of this action plan in accordance with OMB A-133 Section 315 (c) is Anthony Ihejeto, Director of Public Housing Operations, and the anticipated completion date is September 30, 2011.

10-3 Eligibility

Section 8 Housing Choice Voucher Program, CFDA Number 14.871

Material Weakness in Internal Control

Material Noncompliance

Auditors' Recommendation: The Authority needs to correct the deficiencies noted in the tested files and consider the impact of our results over the entire population. In addition, the Authority should develop procedures, systems and controls to ensure proper compliance with regards to tenant eligibility requirements, rent calculations and third party verifications. In addition, staff needs to be continually trained in regards to the rules and regulations to properly administer eligibility. Some of the items above raise an additional concern, such as the incorrect HAP payments and the files that could not be located for inspection, as it could be an indicator of unallowed HAP payments.

Action Taken:

The Authority will revise its processes for file structure and content, its annual and interim reexaminations, its documentations and calculations of utility allowances, and the effectiveness of the procedures for calculating income. It will develop a quality control procedure to determine the degree to which the performance has improved and provide accountability to staff in addressing the problems. Training of all employees on the new processes and procedures will be provided.

The person responsible for the implementation of this action plan in accordance with OMB A-133 Section 315 (c) is Nicole McCray-Dickerson, Director of Section 8, and the anticipated completion date is September 30, 2011.

10-4 Allowable Activities/Costs

Section 8 Housing Choice Voucher Program, CFDA Number 14.871

Veterans Affairs Supportive Housing Program, CFDA Number 14.871 - non-major program

Material Noncompliance

Auditors' Recommendation: We recommend that the Authority maintain funds sufficient to cover the restricted reserves of housing assistance payment equity. In addition, we

recommend that the Authority use Section 8 Housing Choice Voucher and VASH program funding in accordance with 24 CFR 982.157.

Action Taken: The Authority acknowledges the fact that temporary borrowings of Section 8 funds through the "interprogram due from" accounts ended up as unsettled advances to other programs at the end of the fiscal year. Management undertakes to monitor closely the financial operation of other programs particularly the public housing program to ensure that expenses do not exceed the income that the program receives. Remedial actions will be instituted to ensure that these programs operate within their available resources.

The person responsible for the implementation of this action plan in accordance with OMB A-133 Section 315 (c) is Virgilio E. Chua, Accounting Manager, and the anticipated completion date is September 30, 2011.

10-5 Special Tests and Provisions – Housing Quality Standards Inspections

Section 8 Housing Choice Voucher Program, CFDA Number 14.871

Material Weakness in Internal Control

Material Noncompliance

Auditors' Recommendation: We recommend that the Authority develop procedures, systems and controls to ensure proper compliance and documentation with regards to HQS inspections. All inspections need to be maintained for proof of inspection, the letters to the resident regarding the inspections is not sufficient proof of inspections.

Action Taken:

As part of the Corrective Action Plan (CAP) submitted to HUD, the Authority committed to inspect properties that did not meet housing quality standards (HQS), certify that the HQS deficiencies identified during the inspections are corrected and that properties are in compliance with HQS regulations. If the property(s) does not meet HQS, the Authority will take enforcement actions and abate the rent(s) or terminate the housing assistance payment contract(s). The Authority will establish and implement an adequate record-keeping system for inspections and quality control reviews to ensure accurate, consistent, and complete documentation in accordance with HUD rules and regulations.

The person responsible for the implementation of this action plan in accordance with OMB A-133 Section 315 (c) is Nicole McCray-Dickerson, Director of Section 8, and a final action date of September 30, 2011.

10-6 Special Tests and Provisions-Waiting List

Low Rent Public Housing, CFDA Number 14.850

Section 8 Housing Choice Voucher Program, CFDA Number 14.871

Material Weakness in Internal Control

Material Noncompliance

Auditors' Recommendation: The Authority should implement systems and controls to adequately maintain a waiting list that ensures applicants are housed, or given the opportunity to be housed in the proper order. The Authority should print the waiting list to an electronic file each month to ensure that documentation exists.

Action Taken:

The Authority is currently working to adequately maintain and update its waiting list. It will implement written policies and procedures to ensure that individual files for all housing applicants have all original application forms and documents and steps are taken to ensure accurate entry into the waiting list database.

The person responsible for the implementation of this action plan in accordance with OMB A-133 Section 315 (c) is Nicole McCray-Dickerson, Director of Section 8, and the anticipated completion date is September 30, 2011.

10-7 Special Tests and Provisions – HQS Enforcement

Section 8 Housing Choice Voucher Program, CFDA Number 14.871

Material Weakness in Internal Control

Material Noncompliance

Auditors' Recommendation: We recommend that the Authority develop proper procedures and strengthen internal controls relating to HQS inspections and any applicable abatements. A list of failed re-inspections should be regularly reviewed to verify that units that have failed are having HAP properly abated and those that have passed re-inspection are properly taken off of abatement.

Action Taken:

The Authority will implement adequate written procedures and controls to improve the abatement process and ensure that every property under a housing assistance payment contract is in compliance with HUD HQS requirements. Further, the controls will be designed to ensure that deficiencies are corrected timely and that payments are abated where appropriate.

The person responsible for the implementation of this action plan in accordance with OMB A-133 Section 315 (c) is Nicole McCray-Dickerson, Director of Section 8, and the anticipated completion date is September 30, 2011.

If the Department of Housing and Urban Development has questions regarding this plan, please call Henry Alvarez III, Executive Director at (415) 715-3284. The process to start correcting these issues is currently underway, and significant progress is expected for the next fiscal year end audit.

Sincerely yours,



Henry A. Alvarez III
Executive Director

Attachment V

Capital Fund Program

Annual Statement & Performance and Evaluation Report



2012 CAPITAL FUND PROGRAM
ANNUAL SUBMISSION

2012 Capital Fund Program (CFP) Annual Statement

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

Part 1: Summary

HA Name: **AN FRANCISCO HOUSING AUTHORITY**

Grant Type and Number: **Capital Fund Program Grant No: CA39P00150112**

Replacement Housing Factor Grant No: **FFY of Grant: 2012**

Date of CFPP: **FFY of Grant Approval: 2011**

Type of Grant: Original Annual Statement Reserve for Disasters/Emergencies Revised Annual Statement (revision no:)

Performance and Evaluation Report for Period Ending: Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²		Obligated
1	Total non-CFP Funds	\$ -			
2	1406 Operations (may not exceed 20% of line 21) ³	\$ 2,019,548			
3	1408 Management Improvements	\$ 2,019,548			
4	1410 Administration (may not exceed 10% of line 21)	\$ 1,009,774			
5	1411 Audit	\$ -			
6	1415 Liquidated Damages	\$ -			
7	1430 Fees and Costs	\$ 1,200,000			
8	1440 Site Acquisition	\$ -			
9	1450 Site Improvement	\$ 535,000			
10	1460 Dwelling Structures	\$ 3,073,871			
11	1465.1 Dwelling Equipment—Nonexpendable	\$ 25,000			
12	1470 Non-dwelling Structures	\$ -			
13	1475 Non-dwelling Equipment	\$ 210,000			
14	1485 Demolition	\$ -			
15	1492 Moving to Work Demonstration	\$ -			
16	1495.1 Relocation Costs	\$ -			
17	1499 Development Activities ⁴	\$ 5,000			
18a	1501 Collateralization or Debt Service paid by the PHA	\$ -			
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	\$ -			
19	1502 Contingency (may not exceed 8% of line 20)	\$ -			
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$ 10,097,741	\$ -	\$ -	\$ -
21	Amount of line 20 Related to LBP Activities	\$ 25,000			
22	Amount of line 20 Related to Section 504 Activities	\$ 50,000			
23	Amount of line 20 Related to Security - Soft Costs	\$ 1,807,187			
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures	\$ 175,000			

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFPP Grants for operations.

⁴ RHP funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 3/31/2014

Part I: Summary		Grant Type and Number		FFY of Grant: 2012	
PHA Name: SAN FRANCISCO HOUSING AUTHORITY		Capital Fund Program Grant No: CA39P00150112 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant Approval: 2011	
Type of Grant		<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Final Performance and Evaluation Report	
Line Summary by Development Account		Total Estimated Cost		Total Actual Cost ¹	
Signature of Executive Director: Henry A. Alvarez III		Original		Obligated	
Date: 07/11/12		Revised ²		Expended	
		Signature of Public Housing Director		Date	

Part II: Supporting Pages		Federal FFY of Grant: 2012						
LA Name: SAN FRANCISCO HOUSING AUTHORITY		Capital Fund Program Grant No: CA39P00150112 Replacement Housing Factor Grant No: CFRP (Yes/No): NO						
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
ADMINISTRATION (10% GRANT)	TOTAL ADMINISTRATION	1410	100%	\$ 1,009,774				
MANAGEMENT IMPROVEMENT (10% GRANT)	Improve Security	1408	100%	\$ 1,807,187				
	Software and Implementation (Document Imaging)	1408	100%	\$ 110,000				
	MS Licensing	1408	100%	\$ 102,361				
	TOTAL MANAGEMENT IMPROVEMENT			\$ 2,019,548				
OPERATING SUBSIDY (20% GRANT)	TOTAL OPERATING SUBSIDY	1406	100%	\$ 2,019,548				
FEEES AND COSTS	A/E (Includes PMs & Inspector's Salaries)	1430	100%	\$ 1,200,000				
AMP #967, CAL 1-2, Potrero Terrace	Recycling Center	1450	100%	\$ 270,000				
AMP #967, CAL 1-2, Potrero Terrace	Containers	1475	100%	\$ 110,000				
AMP #967, CAL 1-2, Potrero Terrace	Trailers	1475	100%	\$ 60,000				
AMP #967, CAL 1-2, Potrero Terrace	Recycling Bins	1475	100%	\$ 15,000				
AMP #967, CAL 1-2, Potrero Terrace	PG&E electrical connections	1450	100%	\$ 15,000				
AMP #967, CAL 1-2, Potrero Terrace	Boiler Replacements	1460	100%	\$ 75,000				
AMP #984, CAL 1-3(1), JFK Towers	Fire Alarm System Improvements	1460	100%	\$ 250,000				
AMP #986, CAL 1-31, 25 Sanchez	Phase II, Site and Parking Improvements	1450	100%	\$ 200,000				
AMP #981, CAL 1-28, 666 Ellis St	Fire Alarm System Improvements	1460	100%	\$ 250,000				
AMP #984, CAL 1-35, 2698 California street	Fire Alarm System Improvements	1460	100%	\$ 250,000				
	TOTAL DEVELOPMENTS			\$ 1,495,000				

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

Attachment 11: Supporting Pages		Grant Type and Number		Federal FFY of Grant: 2012											
Development Number		Development Account No.		Quantity		Total Estimated Cost		Total Actual Cost		Status of Work					
Name/PHA-Wide Activities		General Description of Major Work Categories		Development Account No.		Quantity		Total Estimated Cost		Total Actual Cost		Status of Work			
								Original		Revised ¹		Funds Obligated ²		Funds Expended ²	
HA WIDE		HA-Wide Lead Abatement	1460	100%	\$25,000										
		HA-Wide Asbestos Abatement	1460	100%	\$25,000										
		Mold and Mildew Remediation	1460	100%	\$25,000										
		Blood-born pathogens decontamination	1460	100%	\$5,000										
		HA-Wide 504/ADA reasonable accommodations (FA)	1460	100%	\$50,000										
		HA-Wide fire unit repair and vacant units rehabilitation (FA), Phase 2 and 3	1460	100%	\$1,200,000										
		HA-Wide New appliances	1465.1	100%	\$25,000										
		HA-Wide Sidewalk repair/replacement and fences (FA)	1450	100%	\$25,000										
		HA-Wide Community facilities and Playground repairs/rep	1450	100%	\$25,000										
		New Fire Lock Box for 24 senior buildings	1460	100%	\$88,871										
		Hardwire smoke detectors (FA)	1460	100%	\$700,000										
		Elevator upgrades	1475	100%	\$25,000										
		Landscaping	1460	100%	\$25,000										
		Roof top ventilation and heat pump improvements	1460	100%	\$25,000										
		Electrical improvements	1460	100%	\$25,000										
		Plumbing Improvements	1460	100%	\$25,000										
		HVAC Improvements	1460	100%	\$25,000										
		Gutter/Downspout replacement	1460	100%	\$5,000										
		Replacement Housing and Revitalization	1499	100%	\$5,000										
				TOTAL PHA WIDE:				\$ 2,353,871							
				TOTAL GRANT:				\$ 10,097,741							

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

III: Implementation Schedule for Capital Fund Financing Program		Federal FFY of Grant: 2012 CFP			
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)	All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹	
		Original Obligation End Date	Actual Obligation End Date		Original Expenditure End Date
ADMINISTRATION (10% GRANT)	Administration	9/31/14		9/30/2016	
MANAGEMENT IMPROVEMENT 0% GRANT)	Improve Security Software and Implementation (Document Imaging) MS Licensing Operating Subsidy	9/31/14		9/30/2016	
OPERATING SUBSIDY (20% GRANT)		9/31/14		9/30/2016	
FEES AND COSTS	A/E (Includes PMs & Inspector's Salaries)	9/31/14		9/30/2016	
CAPITAL FUND FINANCING PROGRAM (CFPP)	Collateralization or Debt Service paid by the PHA	9/31/14		9/30/2016	
MP #967, CAL 1-2, Potrero Terrace	Recycling Center	9/31/14		9/30/2016	
MP #967, CAL 1-2, Potrero Terrace	Containers	9/31/14		9/30/2016	
MP #967, CAL 1-2, Potrero Terrace	Trailers	9/31/14		9/30/2016	
MP #967, CAL 1-2, Potrero Terrace	Recycling Bins	9/31/14		9/30/2016	
MP #967, CAL 1-2, Potrero Terrace	PG&E electrical connections	9/31/14		9/30/2016	
MP #967, CAL 1-2, Potrero Terrace	Boiler Replacements	9/31/14		9/30/2016	
MP #984, CAL 1-18(1), JFK Towers	Fire Alarm System Improvements	9/31/14		9/30/2016	
MP #986, CAL 1-31, 25 Sanchez	Phase II, Site and Parking Improvements	9/31/14		9/30/2016	
MP #981, CAL 1-28, 666 Ellis St	Fire Alarm System Improvements	9/31/14		9/30/2016	
MP #984, CAL 1-35, 2698 California	Fire Alarm System Improvements	9/31/14		9/30/2016	
MP #970, Westbrook	Replace back porch dry rotted balconies (FA)	9/31/14		9/30/2016	
MP #970, Westbrook	Handrail and fence replacement	9/31/14		9/30/2016	
MP #971, Potrero Annex	Handrail and fence replacement/parking area improvements	9/31/14		9/30/2016	
MP #971, Potrero Annex	Sewer rehabilitation (FA)	9/31/14		9/30/2016	
MP #972, Ping Yuen	Trash Room Modernization	9/31/14		9/30/2016	
MP #973, Hunters Point	Sidewalk/ walkways/ concrete repairs (Phase I)	9/31/14		9/30/2016	
MP #973, Hunters Point	Sewer rehabilitation (FA)	9/31/14		9/30/2016	
MP #975, Alice Griffith	Recycling Center	9/31/14		9/30/2016	
MP #979, Woodside Gardens	Concrete repairs and exterior waterproofing	9/31/14		9/30/2016	
MP #980, Mission Dolores	Trash Room Modernization	9/31/14		9/30/2016	
MP #982, 3850 18th St.	Trash Room Modernization	9/31/14		9/30/2016	

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9(j) of the U.S. Housing Act of 1937, as amended.

Part III: Implementation Schedule for Capital Fund Financing Program		Federal FFY of Grant: 2012 CFP				
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)	All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹		
		Original Obligation End Date	Actual Obligation End Date		Original Expenditure End Date	Actual Expenditure End Date
IA WIDE	HA-Wide Lead Abatement	9/31/14		9/30/2016		
	HA-Wide Asbestos Abatement	9/31/14		9/30/2016		
	Mold and Mildew Remediation	9/31/14		9/30/2016		
	Blood-born pathogens decontamination	9/31/14		9/30/2016		
	HA-Wide 504/ADA reasonable accommodations (FA)	9/31/14		9/30/2016		
	HA-Wide fire unit repair and vacant units rehabilitation (FA), Phase 2 and 3	9/31/14		9/30/2016		
	HA-Wide New appliances	9/31/14		9/30/2016		
	HA-Wide Sidewalk repair/replacement and fences (FA)	9/31/14		9/30/2016		
	HA-Wide Community facilities and Playground repairs/replacement.	9/31/14		9/30/2016		
	New Fire Lock Box for 24 senior buildings	9/31/14		9/30/2016		
	Hardwire smoke detectors (FA)	9/31/14		9/30/2016		
	Elevator upgrades	9/31/14		9/30/2016		
	Surveillance cameras	9/31/14		9/30/2016		
	Modernization of Property Offices PHA Wide (FA)	9/31/14		9/30/2016		
	Landscaping	9/31/14		9/30/2016		
	Roof top ventilation and heat pump improvements	9/31/14		9/30/2016		
	Electrical Improvements	9/31/14		9/30/2016		
	Plumbing Improvements	9/31/14		9/30/2016		
	HVAC Improvements	9/31/14		9/30/2016		
	HA Wide interior common space improvements, including furnishings,	9/31/14		9/30/2016		
	Gutter/Downspout replacement	9/31/14		9/30/2016		
	Replacement Housing and Revitalization	9/31/14		9/30/2016		

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.



2012 CAPITAL FUND PROGRAM
ANNUAL SUBMISSION

2012 REPLACEMENT HOUSING FUND (RFH)

Part I: Summary

PHA Name: **SAN FRANCISCO HOUSING AUTHORITY**

Grant Type and Number: Replacement Housing Factor Grant No: **CA39R00150212**

Federal FY of Grant: **CFP 2012 (RHE)**

FFY of Grant Approval:

Original Annual Statement:
 Performance and Evaluation Report for Program Year Ending:

Reserve for Disasters/ Emergencies

Revised Annual Statement/Revision Number:
 Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds	\$ -	\$ -	\$ -	\$ -
2	1406 Operations (may not exceed 20% of line 21) ³	\$ -	\$ -	\$ -	\$ -
3	1408 Management Improvements	\$ -	\$ -	\$ -	\$ -
4	1410 Administration (may not exceed 10% of line 21)	\$ 74,522	\$ -	\$ -	\$ -
5	1411 Audit	\$ -	\$ -	\$ -	\$ -
6	1415 Liquidated Damages	\$ -	\$ -	\$ -	\$ -
7	1430 Fees and Costs	\$ 59,000	\$ -	\$ -	\$ -
8	1440 Site Acquisition	\$ -	\$ -	\$ -	\$ -
9	1450 Site Improvement	\$ -	\$ -	\$ -	\$ -
10	1460 Dwelling Structures	\$ -	\$ -	\$ -	\$ -
11	1465.1 Dwelling Equipment—Nonexpendable	\$ -	\$ -	\$ -	\$ -
12	1470 Non-dwelling Structures	\$ -	\$ -	\$ -	\$ -
13	1475 Non-dwelling Equipment	\$ -	\$ -	\$ -	\$ -
14	1485 Demolition	\$ 100,000	\$ -	\$ -	\$ -
15	1492 Moving to Work Demonstration	\$ -	\$ -	\$ -	\$ -
16	1495.1 Relocation Costs	\$ -	\$ -	\$ -	\$ -
17	1499 Development Activities ⁴	\$ 511,698	\$ -	\$ -	\$ -
18a	1501 Collateralization or Debt Service paid by the PHA	\$ -	\$ -	\$ -	\$ -
18ba	1900 Collateralization or Debt Service paid Via System of Direct Payment	\$ -	\$ -	\$ -	\$ -
19	1602 Contingency (may not exceed 8% of line 20)	\$ -	\$ -	\$ -	\$ -
20	Amount of Annual Grant: (sum of lines 2 – 19)	\$ 745,220	\$ -	\$ -	\$ -
21	Amount of line 20 Related to LBP Activities	\$ -	\$ -	\$ -	\$ -
22	Amount of line 20 Related to Section 504 Activities	\$ -	\$ -	\$ -	\$ -
23	Amount of line 20 Related to Security – Soft Costs	\$ -	\$ -	\$ -	\$ -
24	Amount of line 20 Related to Security – Hard Costs	\$ -	\$ -	\$ -	\$ -
25	Amount of line 20 Related to Energy Conservation Measures	\$ -	\$ -	\$ -	\$ -

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHC funds shall be included here.

Part I: Summary		Grant Type and Number Replacement: Housing Factor Grant No: CA39R00150212		Federal FY of Grant: CFP 2012 (RHE)	
PHIA Name: SAN FRANCISCO HOUSING AUTHORITY		Reserve for Disasters/Emergencies		FFY of Grant Approval:	
Original Annual Statement: Performance and Evaluation Report for Program Year Ending:		Revised Annual Statement/Revision Number:		Final Performance and Evaluation Report	
Line No.		Summary by Development Account		Total Actual Cost ¹	
		Total Estimated Cost		Obligated	
		Original		Expended	
Signature of Executive Director		Date		Signature of Public Housing Director	
X Henry A. Alvarez III, Executive Director		7/11/2012		X	

Annual Statement / Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB Approval No. 2577-0226
 (exp. 4/30/2011)

Part (I): Supporting Pages

PHA Name: **SAN FRANCISCO HOUSING AUTHORITY**

Grant Type and Number
 Replacement Housing Factor Grant No: CA39R00150212

Federal FY of Grant:
 CFP 2012 (RHF)

Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
CAL 1-18(3), Hunters View	Additional funding to build new Public Housing units.	1499	100%	\$ 511,698				
	Demolition	1485	100%	\$ 100,000				
	Fees & Costs	1430	100%	\$ 59,000				
	Administration	1410	100%	\$ 74,522				
				Total Grant:	\$ 745,220			

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

Part III: Implementation Schedule for Capital Fund Financing Program					
PHA Name:		Grant Type and Number			Federal FY of Grant:
SAN FRANCISCO HOUSING AUTHORITY		Replacement Housing Factor No: CA39R00150212			2012 CFP (RHF)
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹
	Original	Actual	Original	Actual	
CAL 1-18(3), Hunters View	9/31/14		9/30/2016		
Additional funding to build new Public Housing units.					
Demolition	9/31/14		9/30/2016		
Fees & Costs	9/31/14		9/30/2016		
Administration	9/31/14		9/30/2016		

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j) of the U.S. Housing Act of 1937, as amended.

Part I: Summary		Grant Type and Number		Revised Annual Statement/Revision Number	
PHA Name		Replacement Housing Factor Grant No:		CFP 2012 (RHF)	
SAN FRANCISCO HOUSING AUTHORITY		CA39R00150112		FFY of Grant Approval:	
Original Annual Statement:		Reserve for Disasters/Emergencies		Final Performance and Evaluation Report	
Performance and Evaluation Report for Program Year Ending:		Total Estimated Cost		Total Actual Cost ¹	
Line No.	Summary by Development Account	Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds	\$ -	\$ -	\$ -	\$ -
2	1406 Operations (may not exceed 20% of line 21) ³	\$ -	\$ -	\$ -	\$ -
3	1408 Management Improvements	\$ -	\$ -	\$ -	\$ -
4	1410 Administration (may not exceed 10% of line 21)	\$ 21,606	\$ -	\$ -	\$ -
5	1411 Audit	\$ -	\$ -	\$ -	\$ -
6	1415 Liquidated Damages	\$ -	\$ -	\$ -	\$ -
7	1430 Fees and Costs	\$ 17,285	\$ -	\$ -	\$ -
8	1440 Site Acquisition	\$ -	\$ -	\$ -	\$ -
9	1450 Site Improvement	\$ -	\$ -	\$ -	\$ -
10	1460 Dwelling Structures	\$ -	\$ -	\$ -	\$ -
11	1465.1 Dwelling Equipment—Nonexpendable	\$ -	\$ -	\$ -	\$ -
12	1470 Non-dwelling Structures	\$ -	\$ -	\$ -	\$ -
13	1475 Non-dwelling Equipment	\$ -	\$ -	\$ -	\$ -
14	1485 Demolition	\$ 15,000	\$ -	\$ -	\$ -
15	1492 Moving to Work Demonstration	\$ -	\$ -	\$ -	\$ -
16	1495.1 Relocation Costs	\$ -	\$ -	\$ -	\$ -
17	1499 Development Activities ⁴	\$ 162,170	\$ -	\$ -	\$ -
18a	501 Collateralization or Debt Service paid by the PHA	\$ -	\$ -	\$ -	\$ -
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	\$ -	\$ -	\$ -	\$ -
19	1502 Contingency (may not exceed 8% of line 20)	\$ -	\$ -	\$ -	\$ -
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$ 216,061	\$ -	\$ -	\$ -
21	Amount of line 20 Related to LBP Activities	\$ -	\$ -	\$ -	\$ -
22	Amount of line 20 Related to Section 504 Activities	\$ -	\$ -	\$ -	\$ -
23	Amount of line 20 Related to Security - Soft Costs	\$ -	\$ -	\$ -	\$ -
24	Amount of line 20 Related to Security - Hard Costs	\$ -	\$ -	\$ -	\$ -
25	Amount of line 20 Related to Energy Conservation Measures	\$ -	\$ -	\$ -	\$ -

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHF funds shall be included here.

Part I: Summary								
PHA Name: SAN FRANCISCO HOUSING AUTHORITY	Grant Type and Number Replacement Housing Factor Grant No: CA39R00150412							
<input checked="" type="checkbox"/> Original Annual Statement: <input type="checkbox"/> Performance and Evaluation Report for Program Year Ending:	Federal FY of Grant: CFP 2012 (RHE) FFY of Grant Approval:							
<input type="checkbox"/> Reserve for Disasters/ Emergencies <input type="checkbox"/> Revised Annual Statement/Revision Number: _____ <input type="checkbox"/> Final Performance and Evaluation Report	Total Actual Cost ¹							
Summary by Development Account								
Line No.	Total Estimated Cost							
	<table border="1"> <tr> <td>Original</td> <td>Revised ²</td> <td>Obligated</td> <td>Expended</td> </tr> <tr> <td>Date: 7/11/2012</td> <td>Signature of Public Housing Director: X</td> <td>Date</td> <td></td> </tr> </table>	Original	Revised ²	Obligated	Expended	Date: 7/11/2012	Signature of Public Housing Director: X	Date
Original	Revised ²	Obligated	Expended					
Date: 7/11/2012	Signature of Public Housing Director: X	Date						
Signature of Executive Director								
X	Henry A. Alvarez III, Executive Director							

Part II: Implementation Schedule for Capital Fund Financing Program						
PHA Name:			Grant Type and Number		Federal FY of Grant:	
SAN FRANCISCO HOUSING AUTHORITY			Replacement Housing Factor No: CA39R00150112		2012 CFP (RHF)	
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹	
	Original	Actual	Original	Actual		
CAL 1-18(3), Hunters View	9/31/14		9/30/2016			
Demolition	9/31/14		9/30/2016			
Fees & Costs	9/31/14		9/30/2016			
Administration	9/31/14		9/30/2016			

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.



2012 CAPITAL FUND PROGRAM
ANNUAL SUBMISSION

**2012 PERFORMANCE AND EVALUATION REPORTS
AS OF 3/31/12**



2012 CAPITAL FUND PROGRAM
ANNUAL SUBMISSION

P&ER FOR 2007 CFP AS OF 3/31/12



SAN FRANCISCO HOUSING AUTHORITY

Executive Office

1815 Egbert Avenue • San Francisco CA • 94124
(415) 715-3284 • Facsimile (415) 508-1733

August 15, 2011

Ms. Melina Whitehead
Acting Director, Office of Public Housing
U.S. Department of Housing and Urban Development
600 Harrison Street
San Francisco, CA 94107

**Re: CA 001 San Francisco Housing Authority (SFHA)
Final Closeout of 2007 Capital Fund - Grant No. CA39P001501-07**

Dear Ms. Whitehead:

Enclosed for your review and approval are an original and two (2) copies of the close-out ACC documents on the 2007 Capital Fund, Grant No. CA39P001501-07. The Authority has completed all activities funded under these Grants and has paid all authorized costs. The close-out documents included with this transmittal letter are as follows:

1. Actual Comprehensive Grant Cost Certificate (ACGCC), HUD-52839
2. Final Performance and Evaluation Reports, HUD-52837

If you or your staff has any questions regarding the close-out reports, please do not hesitate to call Barbara Smith, Administrator of Housing Development and Modernization, at (415) 715-3220. Thank you for your timely assistance in this matter.

Sincerely,

Henry A. Alvarez, III
Executive Director

cc: Justin Gray, Norma Penamante, HUD
Barbara Smith, Alicia Sisca, Elizabeth Tang, SFHA
File

**Actual Comprehensive Grant
Cost Certificate**
Comprehensive Grant Program (CGP)

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

OMB Approval No. 2577-0157
(Exp. 11/30/2008)

PHA/IHA Name San Francisco Housing Authority 1815 Egbert Avenue San Francisco, CA 94124	Comprehensive Grant Number CA39E001501-07 FFY of Grant Approval 2007
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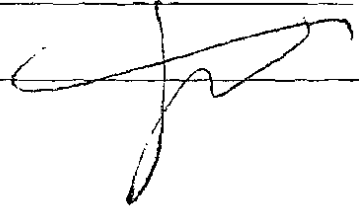
The PHA/IHA hereby certifies to the Department of Housing and Urban Development as follows:

1. That the total amount of Modernization Cost (herein called the "Actual Modernization Cost") of the Comprehensive Grant, is as shown below:

A. Original Funds Approved	\$ 13,963,770
B. Revised Funds Approved	\$ 13,963,770
C. Funds Advanced	\$ -0-
D. Funds Expended (Actual Modernization Cost)	\$ 13,963,770
E. Amount to be Recaptured (A-D)	\$ -0-
F. Excess of Funds Advanced (C-D)	\$ -0-

- That all modernization work in connection with the Comprehensive Grant has been completed;
- That the entire Actual Modernization Cost or liabilities therefor incurred by the PHA have been fully paid;
- That there are no *undischarged mechanics', laborers', contractors', or material-men's liens against such modernization work on file in any public office where the same should be filed in order to be valid against such modernization work; and*
- That the time in which such liens could be filed has expired.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.
Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Signature 	Date 8/15/11
--	------------------------

For HUD Use Only

The Cost Certificate is approved for audit.	
Approved for Audit (Director, Public Housing Division)	Date

The audited costs agree with the costs shown above.	
Verified (Director, Public Housing Division)	Date

Approved (Field Office Manager)	Date
---------------------------------	------



SAN FRANCISCO HOUSING AUTHORITY
Grant Information

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[Menu](#) [Portfolio](#) Grant Information

Grant: CA39P001501-07 (CFP) Capital Fund Program

[General](#) [Budget](#) [Vouchers](#) [Ob/Exp](#)

Contractual Organization: 94-6002959	Contract Info	Funding
SAN FRANCISCO HOUSING AUTHORITY 1815 Egbert Avenue San Francisco, CA 94124-	LOCCS Created: 09-19-2007	Authorized: 13,963,770.00
Payee Organization: - same as contractual-	Effective Date: 09-19-2007	Disbursed: 13,963,770.00
Region: 09 VRS No: 07915-92014 Office: 01 DUNS: 078780160	Obligation Start: 09-13-2007	In process: 0.00
	Obligation End: 09-12-2009	Balance: 0.00
	Disbursement End: 09-12-2011	Collections: 0.00



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Annual Statement / Performance and Evaluation Report
Capital Fund Program (CGP) Part I, Summary

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

OMB Approval No. 2577-0157
(exp. 11/30/2009)

PHA Name: SAN FRANCISCO HOUSING AUTHORITY		Capital Fund Grant Number: CA39P00150107		FFY of Grant Approval: 2007	
Original Annual Statement		Reserve for Disasters/ Emergencies		Revised Annual Statement/Revision Number:	
Performance and Evaluation Report for Program Year Ending:		Replacement Housing Factor No.:		Final Performance and Evaluation Report	
Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised ¹	Obligated	Expended
1	Total non-CFP Funds	\$0	\$0		
2	1406 Operations (May not exceed 20% of line 20)	\$2,792,754	\$2,792,754	\$2,792,754	\$2,792,754
3	1408 Management Improvements (May not exceed 20% of line 20)	\$2,752,519	\$2,752,519	\$2,752,519	\$2,752,519
4	1410 Administration (May not exceed 10% of line 20)	\$1,396,377	\$1,396,377	\$1,396,377	\$1,396,377
5	1411 Audit	\$0	\$0	\$0	\$0
6	1415 Liquidated Damages	\$0	\$0	\$0	\$0
7	1430 Fees and Costs	\$2,020,451	\$2,020,451	\$2,020,451	\$2,020,451
8	1440 Site Acquisition	\$0	\$0	\$0	\$0
9	1450 Site Improvement	\$1,521,334	\$1,521,334	\$1,521,334	\$1,521,334
10	1460 Dwelling Structures	\$3,052,336	\$3,052,336	\$3,052,336	\$3,052,336
11	1465.1 Dwelling Equipment—Nonexpendable	\$0	\$0	\$0	\$0
12	1470 Nondwelling Structures	\$51,539	\$51,539	\$51,539	\$51,539
13	1475 Nondwelling Equipment	\$376,460	\$376,460	\$376,460	\$376,460
14	1485 Demolition	\$0	\$0	\$0	\$0
15	1490 Replacement Reserve	\$0	\$0	\$0	\$0
16	1492 Moving to Work Demonstration	\$0	\$0	\$0	\$0
17	1495.1 Relocation Costs	\$0	\$0	\$0	\$0
18	1499 Mod used for Development	\$0	\$0	\$0	\$0
19	1502 Contingency (May not exceed 8% of line 20)	\$0	\$0	\$0	\$0
20	Amount of Annual Grant (Sum of lines 2-19)	\$13,963,770	\$13,963,770	\$13,963,770	\$13,963,770
21	Amount of line 20 Related to LBP Activities	\$1,932,523	\$1,932,523	\$1,932,523	\$1,932,523
22	Amount of line 20 Related to Section 504 compliance	\$44,145	\$44,145	\$44,145	\$44,145
23	Amount of line 20 Related to Security	\$785,232	\$785,232	\$785,232	\$785,232
24	Amount of line 20 Related to Energy Conservation Measures	\$102,100	\$102,100	\$102,100	\$102,100
Signature of Executive Director		Date		Signature of Public Housing Director/Programs Administrator	
Henry A. Alvarez III, Executive Director		8/15/2011		X	

PHA Name: SAN FRANCISCO HOUSING AUTHORITY
 Development Number: CA39PD0150107
 Name/HA-Wide Activities: Capital Fund Grant Number: 2007

AMPS #	Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev Acct No.	Quantity	Total Estimated Cost			Total Actual Cost		Status of Proposed Work
					Original	Revised	Funds Obligated	Funds Expended		
	OPERATING SUBSIDY (@ 20% OF TOTAL GRANT)	Operating Subsidy	1406		\$ 2,792,754	\$ 2,792,754	\$ 2,792,754	\$ 2,792,754	Work completed	
		Subtotal Operating Subsidy			\$ 2,792,754	\$ 2,792,754	\$ 2,792,754	\$ 2,792,754		
	MANAGEMENT IMPROVEMENTS (@ 20% OF TOTAL GRANT)	Computer Sys Upgrade	1408	100%	\$ 349,571	\$ 349,571	\$ 349,571	\$ 349,571	Work completed	
		Windows Server 2003 Enterprise upgrades	1408	100%	\$ 750	\$ 750	\$ 750	\$ 750	Work completed	
		EMC VMWare Operating System Virtualization	1408	100%	\$ 16,050	\$ 16,050	\$ 16,050	\$ 16,050	Work completed	
		Improve security	1408	100%	\$ 1,710,945	\$ 1,710,945	\$ 1,710,945	\$ 1,710,945	Work completed	
		Community Supportive Services	1408	100%	\$ 675,203	\$ 675,203	\$ 675,203	\$ 675,203	Work completed	
		Subtotal Management Improvements			\$ 2,752,519	\$ 2,752,519	\$ 2,752,519	\$ 2,752,519		
	ADMINISTRATION	Administration of CFP 10% of total Grant	1410		\$ 1,396,377	\$ 1,396,377	\$ 1,396,377	\$ 1,396,377	Work completed	
		Subtotal Administration			\$ 1,396,377	\$ 1,396,377	\$ 1,396,377	\$ 1,396,377		
	FEEES AND COSTS	A/E Consultants	1430	As Req.	\$ 1,499,725	\$ 1,499,725	\$ 1,499,725	\$ 1,499,725	Work completed	
		A/E Staffing (Inspectors/Proj. Mgr)	1430	As Req.	\$ 456,155	\$ 456,155	\$ 456,155	\$ 456,155	Work completed	
		Lead Testing	1430	As Req.	\$ 33,240	\$ 33,240	\$ 33,240	\$ 33,240	Work completed	
		Asbestos Testing	1430	As Req.	\$ 31,331	\$ 31,331	\$ 31,331	\$ 31,331	Work completed	
		Subtotal Fees and Costs			\$ 2,020,451	\$ 2,020,451	\$ 2,020,451	\$ 2,020,451		

Annual Statement/Performance and Evaluation Report
 Capital Fund Program (CFP)
 Part II: Supporting Pages

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

OMB Approval No. 2577-0157
 (exp. 11/30/2009)

FFY of Grant Approval:
 2007

Capital Fund Grant Number
 CA39P00150107

PHA Name:
 SAN FRANCISCO HOUSING AUTHORITY

AMPS #	Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct/ No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Proposed Work? Work Reprogrammed
					Original	Revised ¹	Funds Obligated ²	Funds Encumbered ³	
	PHA-Wide								
		Landscaping	1450	As Req	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
		HA-Wide Sidewalk repair/replacement and fences (FA)	1450	As Req	\$ 2,500	\$ 2,500	\$ 2,500	\$ 2,500	Work completed
		HA-Wide Sidewalk repair/replacement	1450	As Req	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
		Sewer Repairs	1450	As Req	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
		HA-Wide Lead Abatement	1460	As Req	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
		HA-Wide Asbestos Abatement	1460	As Req	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
		Mold and Mildew Remediation	1460	As Req	\$ 82,987	\$ 82,987	\$ 82,987	\$ 82,987	Work completed
		Elbow/born pathogens disinfection	1460	As Req	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
		HA-Wide 504/ADA reasonable accommodations (FA)	1480	As Req	\$ 19,705	\$ 19,705	\$ 19,705	\$ 19,705	Work completed
		HA-Wide fire unit repair	1460	As Req	\$ 332,267	\$ 332,267	\$ 332,267	\$ 332,267	Work completed
		Hardwire smoke detectors	1460	As Req	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
		Elevator upgrades	1460	As Req	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
		Roofing ventilation	1460	As Req	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
		Electrical improvements	1460	As Req	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
		Plumbing improvements	1460	As Req	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
		HVAC Improvements	1460	As Req	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
		Vacant Unit Rehabilitation - Blazer services	1460	As Req	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
		HA Wide interior common areas improvements, including furnishings, fixtures and equipment (FA)	1460	As Req	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
		Gutter/Downspout replacement	1460	As Req	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
		Bathroom Repair	1460	As Req	\$ 32,856	\$ 32,856	\$ 32,856	\$ 32,856	Work completed
		HA-Wide New appliances	1465	As Req	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
		HA-Wide Community facilities	1470	As Req	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
		Modernization of Property Offices PHA Wide (FA)	1475	As Req	\$ 34,735	\$ 34,735	\$ 34,735	\$ 34,735	Work completed
		Surveillance cameras	1495	As Req	\$ -	\$ -	\$ -	\$ -	Work reprogrammed
		Replacement Housing and Revitalization	1499	As Req	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
		Subtotal Non-dwelling Equipment			\$ 505,050	\$ 505,050	\$ 505,050	\$ 505,050	

Annual Statement/Performance and Evaluation Report
 Capital Fund Program (CFP)
 Part II: Supporting Pages

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

OMB Approval No. 2577-0157
 (exp. 11/30/2008)

AMPS #	Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost			Total Actual Cost		Status of Proposed Work ²
					Original	Revised ¹	Funds Obligated ³	Funds Expended ⁴		
966	966-01 CAL 1-1, Holly Courts	Site Improvement Interior Unit Rehabilitation (Phase I) Vacant Units Laundry Room Wireless Equipments	1450 1460 1460 1470 1475	100% 100% 100% 100% 100%	\$ 199,713 \$ - \$ 22,248 \$ - \$ 2,634	\$ 199,713 \$ - \$ 22,248 \$ - \$ 2,634	\$ 199,713 \$ - \$ 22,248 \$ - \$ 2,634	\$ 199,713 \$ - \$ 22,248 \$ - \$ 2,634	Work completed Work Reprogrammed Work completed by FIA Work reprogrammed Work completed	
968	968-03 CAL 1-3, Sunnydale	Security fencing/ Site Improvements Sidewalk Repair Garbage Chutes Security Gate Exterior Painting Electrical Improvement Playground Equipment Playground Repair Vacant Units	1450 1450 1450 1450 1460 1460 1475 1450 1460	100% 100% 100% 100% 100% 100% 100% 100% 100%	\$ - \$ 118,000 \$ 325,663 \$ 23,800 \$ 1,127,498 \$ 3,409 \$ 48,533 \$ 5,825 \$ 90,270	\$ - \$ 118,000 \$ 325,663 \$ 23,800 \$ 1,127,498 \$ 3,409 \$ 48,533 \$ 5,825 \$ 90,270	\$ - \$ 118,000 \$ 325,663 \$ 23,800 \$ 1,127,498 \$ 3,409 \$ 48,533 \$ 5,825 \$ 90,270	\$ - \$ 118,000 \$ 325,663 \$ 23,800 \$ 1,127,498 \$ 3,409 \$ 48,533 \$ 5,825 \$ 90,270	Work Reprogrammed Work completed Work completed Work completed Work completed Work completed by FIA Work completed by FIA Work completed by FIA Work completed by FIA	
967	967-02 CAL 1-2, Roberto Torrez	Vacant Units (P:4) Vacant Units (Phase 10) 504 Water lines	1460 1460 1460 1460	100% 100% 100% 100%	\$ - \$ 93,419 \$ 1,260 \$ 325	\$ - \$ 93,419 \$ 1,260 \$ 325	\$ - \$ 93,419 \$ 1,260 \$ 325	\$ - \$ 93,419 \$ 1,260 \$ 325	Work reprogrammed Work completed by Fata Account Work completed by Fata Account Work completed	
971	971-08 CAL 1-8, Polaris Annex	Bolier Child Care Center Vacant Units Heater	1460 1470 1460 1460	100% 100% 100% 100%	\$ 9,500 \$ 3,596 \$ 200,579 \$ 14,200	\$ 9,500 \$ 3,596 \$ 200,579 \$ 14,200	\$ 9,500 \$ 3,596 \$ 200,579 \$ 14,200	\$ 9,500 \$ 3,596 \$ 200,579 \$ 14,200	Work completed Work completed by FIA Work completed by FIA Work completed	
970	970-07 CAL 1-8, Westbrook	Exterior Paint/ LP Stabilization Stairs 504 Vacant Units Exterior Handicalls	1460 1460 1460 1460 1450	100% 100% 100% 100% 100%	\$ - \$ 1,500 \$ 2,409 \$ 2,056 \$ 1,900	\$ - \$ 1,500 \$ 2,409 \$ 2,056 \$ 1,900	\$ - \$ 1,500 \$ 2,409 \$ 2,056 \$ 1,900	\$ - \$ 1,500 \$ 2,409 \$ 2,056 \$ 1,900	Work Reprogrammed Work completed Work completed by FIA Work completed by FIA Work completed	
973	973-12 CAL 1-7A, Hunters Point A West	Sewer Repair Vacant Units	1450 1460	100% 100%	\$ 512 \$ 267	\$ 512 \$ 267	\$ 512 \$ 267	\$ 512 \$ 267	Work completed Work completed by FIA	

¹Total completed for the Performance and Evaluation Report or a Revised Annual Statement.
²To be completed for the Performance and Evaluation Report.

PHA Name: SAN FRANCISCO HOUSING AUTHORITY

Capital Fund Grant Number: CA39P06150107

FY of Grant Approval: 2007

AMPS #	Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev Act/ No.	Quantity	Total Estimated Cost		Revised	Total Actual Cost		Status of Proposed Work?
					Original	Funds Obligated?		Funds Obligated?	Funds expended?	
973	973-13 CAL 1-17A, Hunters Point E East	Vacant Units Mail Boxes	1460	100%	\$ 4,983	\$ 4,983	\$ 4,983	\$ 4,983	\$ 4,983	Work completed by F/A
			1460	100%	\$ 6,684	\$ 6,684	\$ 6,684	\$ 6,684	\$ 6,684	Work completed
985	985-11 CAL 1-18, Germany	Kitchen sink and countertop replacement (Phase 1) Vacant Units	1460	100%	\$ -	\$ -	\$ -	\$ -	\$ -	Work Re-programmed
			1460		\$ 147,256	\$ 147,256	\$ 147,256	\$ 147,256	\$ 147,256	Work completed by F/A
			1460		\$ 1,900	\$ 1,900	\$ 1,900	\$ 1,900	\$ 1,900	Work completed
974	974-16 CAL 1-18(3), Hunters View	Window Relocation Sidewalk Repair	1460	100%	\$ 58,363	\$ 58,363	\$ 58,363	\$ 58,363	\$ 58,363	Work completed
			1460	100%	\$ -	\$ -	\$ -	\$ -	\$ -	Work Re-programmed
			1460		\$ 19,643	\$ 19,643	\$ 19,643	\$ 19,643	\$ 19,643	Work completed
975	975-16 CAL 1-18(4), Alice Griffith	Vacant Units Fence & Gate Boiler ADA-504	1460		\$ 170,384	\$ 170,384	\$ 170,384	\$ 170,384	\$ 170,384	Work completed by F/A
			1460		\$ 19,441	\$ 19,441	\$ 19,441	\$ 19,441	\$ 19,441	Work completed
			1460		\$ 88,894	\$ 88,894	\$ 88,894	\$ 88,894	\$ 88,894	Work completed
			1460		\$ 1,600	\$ 1,600	\$ 1,600	\$ 1,600	\$ 1,600	Work completed
972	972-10 CAL 1-15, PING YUEN	Paving Sidewalk Repair Fencing ADA-604 Boiler Replacement Security Roof	1450	100%	\$ 329,495	\$ 329,495	\$ 329,495	\$ 329,495	\$ 329,495	Work completed
			1450		\$ 15,950	\$ 15,950	\$ 15,950	\$ 15,950	\$ 15,950	Work completed
			1450		\$ 38,721	\$ 38,721	\$ 38,721	\$ 38,721	\$ 38,721	Work completed
			1460	100%	\$ 2,139	\$ 2,139	\$ 2,139	\$ 2,139	\$ 2,139	Work completed by F/A
			1460		\$ 95,303	\$ 95,303	\$ 95,303	\$ 95,303	\$ 95,303	Work completed
			1460	100%	\$ 17,641	\$ 17,641	\$ 17,641	\$ 17,641	\$ 17,641	Work completed
			1460		\$ 1,465	\$ 1,465	\$ 1,465	\$ 1,465	\$ 1,465	Work completed
976	976-16 CAL 1-18(6), Ping Yuen North	Paving Lighting - Light Cover Replacement Sidewalk Repair Security Plumbing Emergency Lighting	1450	100%	\$ 109,832	\$ 109,832	\$ 109,832	\$ 109,832	\$ 109,832	Work completed
			1450		\$ 30,752	\$ 30,752	\$ 30,752	\$ 30,752	\$ 30,752	Work completed
			1450		\$ 32,416	\$ 32,416	\$ 32,416	\$ 32,416	\$ 32,416	Work completed
			1460	100%	\$ 8,301	\$ 8,301	\$ 8,301	\$ 8,301	\$ 8,301	Work completed
			1460		\$ 1,850	\$ 1,850	\$ 1,850	\$ 1,850	\$ 1,850	Work completed
976	976-23 CAL 1-19(1), 983 Pacific	Emergency Lighting	1460		\$ 4,635	\$ 4,635	\$ 4,635	\$ 4,635	\$ 4,635	Work completed by F/A

PHA Name: **SAN FRANCISCO HOUSING AUTHORITY**

Capital Fund Grant Number
CA39P00150107

FFY of Grant Approval:
2007

AMPS #	Development Number Name/NA-Wide Activities	General Description of Major Work Categories	Dev. Act No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Proposed Work ²
					Original	Revised	Funds Obligated ¹	Funds Expended ²	
972	CAL 1-36, 227 Bay Street	Emergency Lighting Fire Screen	1480	100%	\$ 3,405	\$ 3,405	\$ 3,405	\$ 3,405	Work completed by FIA
			1460	100%	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
969	CAL 1-8, Westside Courts	Water main and sewer improvements (Phase I) Parking Lot Vacant Units Exterior improvements, painting (Phase I)	1450	100%	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
			1450	100%	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
			1460	100%	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
			1460	100%	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
984	CAL 1-18(1), JFS	Emergency Lighting Water Pipes	1460		\$ 4,500	\$ 4,500	\$ 4,500	\$ 4,500	Work completed
			1460	100%	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
977	CAL 1-32, 1760 Bush St	Emergency Lighting ADA-504 Fire alarm system Electrical Upgrade Garbage Room	1460		\$ 4,688	\$ 4,688	\$ 4,688	\$ 4,688	Work completed
			1460		\$ 2,803	\$ 2,803	\$ 2,803	\$ 2,803	Work completed by FIA
			1460		\$ -	\$ -	\$ -	\$ -	Work reprogrammed
			1460		\$ 898	\$ 898	\$ 898	\$ 898	Work completed by FIA
			1460		\$ 1,600	\$ 1,600	\$ 1,600	\$ 1,600	Work completed
			1460		\$ -	\$ -	\$ -	\$ -	
			1460	100%	\$ -	\$ -	\$ -	\$ -	
977	CAL 1-23, 1880 Pine St	Change from carpet to linoleum units and common areas Emergency Lighting ADA-504 Fire alarm system Boiler Replacement Vent Covers	1460	100%	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
			1460		\$ 6,222	\$ 6,222	\$ 6,222	\$ 6,222	Work completed
			1460		\$ 503	\$ 503	\$ 503	\$ 503	Work completed by FIA
			1460		\$ 14,000	\$ 14,000	\$ 14,000	\$ 14,000	Work completed
			1460	100%	\$ -	\$ -	\$ -	\$ -	Work Reprogrammed
			1460		\$ 4,817	\$ 4,817	\$ 4,817	\$ 4,817	Work completed by FIA
			1460		\$ -	\$ -	\$ -	\$ -	
986	CAL 1-35, 2698 California St	ADA-504 Emergency Lighting	1460		\$ 2,476	\$ 2,476	\$ 2,476	\$ 2,476	Work completed by FIA
			1460		\$ 9,796	\$ 9,796	\$ 9,796	\$ 9,796	Work completed by FIA
984	CAL 1-29 245 Aqueduct	Exterior Handrails Emergency Lighting	1450	100%	\$ 31,910	\$ 31,910	\$ 31,910	\$ 31,910	Work completed by FIA
			1460		\$ 3,867	\$ 3,867	\$ 3,867	\$ 3,867	Work completed by FIA
978	CAL 1-18(5), Rosa Park	Sewer Improvement Emergency Lighting	1450	100%	\$ 38,603	\$ 38,603	\$ 38,603	\$ 38,603	Work completed
			1460		\$ 10,214	\$ 10,214	\$ 10,214	\$ 10,214	Work completed by FIA
986	CAL 1-31, 25 Sanchez	Emergency Lighting	1460		\$ 3,911	\$ 3,911	\$ 3,911	\$ 3,911	Work completed by FIA
			1460		\$ -	\$ -	\$ -	\$ -	

Annual Statement of Performance and Evaluation Report
 Capital Fund Program (CFP)
 Part II: Supporting Pages

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

OMB Approval No. 2577-0157
 (exp. 12/2020)

PNA Name:

Capital Fund Grant Number
 CA39PD0150107

FY of Grant Approval
 2007

SAN FRANCISCO HOUSING AUTHORITY

AMPS #	Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Act No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Proposed Work?	
					Original	Revised	Funds Obligated	Funds Expended		
987	987-46 CAL 1-39A 993 Edith St	Emergency Lighting Water Pipes	1460 1460		\$ 1,888	\$ 1,888	\$ 1,888	\$ 1,888	Work completed by FIA Work Reprogrammed	
					\$ -	\$ -	\$ -	\$ -		
987	987-47 CAL 1-39B 951 Edith St	Emergency Lighting	1450		\$ 2,653	\$ 2,653	\$ 2,653	\$ 2,653	Work completed by FIA	
988	988-51 CAL 1-18(13) Robert Pitts	Exterior Lighting	1450		\$ 22,600	\$ 22,600	\$ 22,600	\$ 22,600	Work completed	
		Landscaping	1450		\$ 96,457	\$ 96,450	\$ 96,450	\$ 96,450	Work completed	
		Flood Protection	1460		\$ 6,498	\$ 6,498	\$ 6,498	\$ 6,488	Work completed by FIA	
		Paint	1460		\$ 4,500	\$ 4,500	\$ 4,500	\$ 4,500	Work completed	
		Gate & Stair Repair	1466		\$ 17,442	\$ 17,442	\$ 17,442	\$ 17,442	Work completed	
		Wireless Equipments	1475	100%	\$ 2,631	\$ 2,631	\$ 2,631	\$ 2,631	Work completed	
		Fire Alarm	1460		\$ 11,314	\$ 11,314	\$ 11,314	\$ 11,314	Work completed	
		504 - Modification	1460		\$ 3,835	\$ 3,835	\$ 3,835	\$ 3,835	Work completed by FIA	
982	982-27 CAL 1-20, 3850 18th st & 255 Dorland	Emergency Lighting	1460		\$ 5,224	\$ 5,224	\$ 5,224	\$ 5,224	Work completed by FIA	
		Boiler	1460		\$ 6,797	\$ 6,797	\$ 6,797	\$ 6,797	Work completed	
		Elevator	1460		\$ 22,751	\$ 22,751	\$ 22,751	\$ 22,751	Work completed	
		Exterior Painting	1460		\$ 9,059	\$ 9,059	\$ 9,069	\$ 9,069	Work completed by FIA	
		Vacant Units	1460	100%	\$ 30,708	\$ 30,708	\$ 30,708	\$ 30,708	Work completed by FIA	
		Roof Repair	1460		\$ 1,840	\$ 1,840	\$ 1,840	\$ 1,840	Work completed	
986	986-28 CAL 1-30, 482 Duboce	Emergency Lighting	1460		\$ 3,934	\$ 3,934	\$ 3,934	\$ 3,934	Work completed by FIA	
		Boiler	1460		\$ 11,538	\$ 11,538	\$ 11,538	\$ 11,538	Work completed	
980	980-21 CAL 1-16(13) Mission Delores	Emergency Lighting	1460		\$ 8,637	\$ 8,637	\$ 8,637	\$ 8,637	Work completed by FIA	
		Fire Line	1460		\$ 2,500	\$ 2,500	\$ 2,500	\$ 2,500	Work completed	
979	979-22 CAL 1-18(10), 255 Woodside	Emergency Lighting	1460		\$ 4,031	\$ 4,031	\$ 4,031	\$ 4,031	Work completed by FIA	
		Water pipes	1460		\$ 13,000	\$ 13,000	\$ 13,000	\$ 13,000	Work completed	
		ADA-504	1460	100%	\$ 2,575	\$ 2,575	\$ 2,575	\$ 2,575	Work completed by FIA	
985	985-36 CAL 1-34, 200 Randolph	Stairs	1460	100%	\$ 7,239	\$ 7,239	\$ 7,239	\$ 7,239	Work completed	

Annual Statement/Performance and Evaluation Report
 Capital Fund Program (CFP)
 Part II: Supporting Pages

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

OMB Approval No. 2577-0157
 (exp. 11/30/2008)

FFY of Grant Approval:
 2007

Capital Fund Grant Number:
 CA39P00150107

PHF Name:
 SAN FRANCISCO HOUSING AUTHORITY

AMPS #	Development Number Name/NA-Wide Activities	General Description of Major Work Categories	Dev. Act No.	Quantity	Total Estimated Cost		Total Actual Cost:		Status of Progress/Work?
					Original	Revised	Funds Obligated?	Funds Expended?	
980	980-37 CAL 1-39, 363 Nos St	Emergency Lighting	1480		\$ 2,851 \$	2,851 \$	2,851 \$	2,851 \$	Work completed by F/A
986	986-42 CAL 1-37, 49, 131st Ave	Vacant Units	1480	100%	\$ 22,794 \$	22,794 \$	22,794 \$	22,794 \$	Work completed by F/A
		Emergency Lighting	1480		\$ 7,284 \$	7,284 \$	7,284 \$	7,284 \$	Work completed by F/A
		ADA-504	1480		\$ 4,840 \$	4,840 \$	4,840 \$	4,840 \$	Work completed by F/A
985	985-43 CAL 1-18(2) MizAlister	Emergency Lighting	1480		\$ 4,657 \$	4,657 \$	4,657 \$	4,657 \$	Work completed by F/A
		Rent & Deck Repair	1480		\$ 880 \$	880 \$	880 \$	880 \$	Work completed
		Boiler	1480		\$ 9,998 \$	9,998 \$	9,998 \$	9,998 \$	Work completed
981	981-25 CAL 1-27, 350 Ellis St	Upgrade entry, gate and fence.	1450	100%	\$ - \$	- \$	- \$	- \$	Work Reprogrammed
		Emergency Lighting	1480		\$ 5,593 \$	5,593 \$	5,593 \$	5,593 \$	Work completed by F/A
		Ventilation System Improvements	1480	100%	\$ - \$	- \$	- \$	- \$	Work reprogrammed
983	983-31 CAL 1-21, 320330 Clementine	Fire line	1460	100%	\$ 79,674 \$	79,674 \$	79,674 \$	79,674 \$	Work completed
		Emergency Lighting	1480		\$ 10,161 \$	10,161 \$	10,161 \$	10,161 \$	Work completed by F/A
981	981-32 CAL 1-28, 568 Ellis St	Upgrade entry, gate and fence.	1450	100%	\$ 42,000 \$	42,000 \$	42,000 \$	42,000 \$	Work completed
		Emergency Lighting	1480		\$ 7,155 \$	7,155 \$	7,155 \$	7,155 \$	Work completed by F/A
		Window Replacement	1480	100%	\$ - \$	- \$	- \$	- \$	Work Reprogrammed
		Fire Alarm	1480	100%	\$ - \$	- \$	- \$	- \$	Work Reprogrammed
987	987-49 CAL 1-41, 430-440 Turk St	Emergency Lighting	1460		\$ 5,311 \$	5,311 \$	5,311 \$	5,311 \$	Work completed by F/A
		Admin. Office Rehabilitation	1470	100%	\$ 47,943 \$	47,943 \$	47,943 \$	47,943 \$	Work completed by F/A
		Subtotal Developments:			\$ 4,208,692 \$	4,208,692 \$	4,208,692 \$	4,208,692 \$	

PHA Name	Development Number Name/NA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates	
		Original	Revised	Original	Revised		
		Actual	Actual	Actual	Actual		
966-01 CAL 1-1, Holly Court	Site Improvement		6/30/08	6/30/08	7/17/11	Work completed	
	Interior Unit Rehabilitation (Phase 1)	7/17/09				Work Reprogrammed	
	Vacant Units			3/31/10	12/31/10	Work completed by Force Account	
	Laundry Room					Work Reprogrammed	
	Wireless Equipments			12/31/08	12/31/09	Work completed	
	Security fencing/Site Improvements	7/17/09				Work Reprogrammed	
	Sidewalk Repair			9/30/10	9/30/11	Work completed	
	Garbage Chutes			9/30/10	9/30/11	Work completed	
	Security Gate			3/31/10	9/30/10	Work completed	
	Exterior Painting			9/30/08	9/30/09	Work completed	
967-02 CAL 1-5, Rogers Terrace	Electrical Improvement			3/31/10	3/31/10	Work completed by Force Account	
	Playground Equipment			12/31/09	3/31/10	Work completed by Force Account	
	Playground Repair			12/31/09	3/31/10	Work completed by Force Account	
	Vacant Units			12/31/09	3/31/10	Work completed by Force Account	
	Vacant Units (P 14)			3/31/08	12/31/08	Work Reprogrammed	
	Vacant Units			3/31/08	12/31/08	Work completed by Force Account	
	ADA Modification			9/31/08	6/30/10	Work completed by Force Account	
	Water Lines			3/31/11	6/30/11	Work completed	
	Boiler			9/30/08	12/31/09	Work completed	
	Chimney Center			12/31/09	12/31/09	Work completed by Force Account	
971-08 CAL 1-9, Robero Annex	Vacant Units			3/31/08	3/31/10	Work completed by Force Account	
	Head			12/31/10	12/31/10	Work completed	
	Exterior Paint/LBP Stabilization	7/17/09				Work Reprogrammed	
	Stairs			6/30/09	9/30/09	Work completed	
	504 Modifier			6/30/09	3/31/10	Work completed by Force Account	
	Vacant Units			12/31/08	12/31/08	Work completed by Force Account	
	Exterior Handrails			3/31/11	6/30/11	Work completed	
	970-07 CAL 1-9, Westbrook	Exterior Handrails			3/31/11	6/30/11	Work completed
		Stairs			6/30/09	9/30/09	Work completed
		504 Modifier			6/30/09	3/31/10	Work completed by Force Account
Vacant Units				12/31/08	12/31/08	Work completed by Force Account	
Exterior Handrails				3/31/11	6/30/11	Work completed	
Stairs				6/30/09	9/30/09	Work completed	
504 Modifier				6/30/09	3/31/10	Work completed by Force Account	
Vacant Units				12/31/08	12/31/08	Work completed by Force Account	
Exterior Handrails				3/31/11	6/30/11	Work completed	
Stairs				6/30/09	9/30/09	Work completed	

Annual Statement of Performance and Exclusion Report
 Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFPIC/FPA/HF)
 Part III: Implementation Schedule
 PHA Name: SAR FRANCISCO HOUSING AUTHORITY
 U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Grant Type and Number: Capital Fund Program No. CA39900190142
 Federal FY of Grant: 2007 CFF

ONS Approval No. 2577-0157
 (exp. 1/30/2008)

Annual Statement/Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFY/CPR/HF) Part III: Implementation Schedule		U.S. Department of Housing and Urban Development Office of Public and Indian Housing Grant Type and Number Capital Fund Program No: C03902160 W7		OMB Approval No. 2577-015: (exp 1/10/2008) Federal FY of Grant: 2007 CPP		Reasons for Revised Target Dates		
PHA Name: SAN FRANCISCO HOUSING AUTHORITY	Development Number Name/NA-WDB Activities	All Funds Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Original	Actual	
		Original	Revised	Original	Revised			
973-12 CAL 1-17A, HUNTERS POINT A WEST	Sewer Repair	6/30/08		6/30/11	7/17/11		6/30/11	Work completed
	Vacant Units	6/30/08		3/31/09	7/17/11		6/30/09	Work completed by Force Account
	Vacant Units			3/31/09			3/31/09	Work completed by Force Account
	Mail Boxes			3/31/09			3/31/09	Work completed
968-11 CAL 1-16, ALERTARY	Kitchen sink and countertop replacement (Phase 1)	7/17/09			7/17/11			Work Reprogrammed
	Vacant Units	7/17/09		3/31/10	7/17/11		6/30/10	Work completed by Force Account
	Fence & Gate			12/31/10			3/31/11	Work completed
	Window Replacement	7/17/09		6/30/10	7/17/11		6/30/10	Work completed
974-15 CAL 1-18(3), HUNTER VIEW	Relocation	7/17/09			7/17/11			Work Reprogrammed
	Sidewalk Repair			6/30/11			6/30/11	Work completed
	Vacant Units							Work in progress by Force Account
	Fence & Gate			3/31/10			3/31/10	Work completed
975-16 CAL 1-18(4) ALICE SMITH	Boiler			9/30/10			9/30/10	Work completed
	504 Modification			6/30/11			6/30/11	Work completed
	Paving			3/31/09			9/30/09	Work completed
	Sidewalk Repair			9/30/09			12/31/09	Work completed
972-10 CAL 1-15, PING YUEN	Fencing			3/31/10			3/31/10	Work completed
	ADA-504			6/30/10			9/30/10	Work completed by Force Account
	Boiler Replacement			9/30/09			12/31/09	Work completed
	Security			6/30/08			3/31/09	Work completed
	Roof			6/30/11			6/30/11	Work completed

FHA Name SAN FRANCISCO HOUSING AUTHORITY	Development Number Name/HA-Wide Activities	All Funds Collected (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates
		Original	Revised	Original	Revised	
976-18 CAL 1-18(1) PING YUEN NORTH	Paving			3/31/09		Work completed
	Lighting - Light Cover Replacement			3/31/10		Work completed
	Sidewalk Repair			9/30/09		Work completed
	Security			6/30/08		Work completed
	Plumbing			3/31/11		Work completed
976-20 CAL 1-19(1) 990 Pacific	Emergency Lighting			6/30/09		Work completed by Force Account
972-24 CAL 1-26, 227 Bay Street	Emergency Lighting			6/30/09		Work completed by Force Account
	Fire Screen	7/17/09			7/17/11	Work Reprogrammed
	Water main and sewer improvements (Phase I)	7/17/09			7/17/11	Work Reprogrammed
	Parking Lot	7/17/09			7/17/11	Work Reprogrammed
989-06 CAL 1-3, Wustside Courts	Vacant Units				7/17/11	Work Reprogrammed
	Exterior improvements, painting (Phase I)	7/17/09			7/17/11	Work Reprogrammed
904-20 CAL 1-18(1) JFK	Emergency Lighting			6/30/09		Work completed by F/A
	Water Pipes					Work Reprogrammed
977-33 CAL 1-32, 1260 Buan St.	Emergency Lighting			6/30/09		Work completed by F/A
	ADA-504			6/30/09		Work completed by Force Account
	Fire alarm system	7/17/09			7/17/11	Work reprogrammed
	Electrical Upgrade			6/30/11		Work completed by Force Account
	Garbage Room			6/30/11		Work completed

Federal FY of Grant:
2007 CFP

Client Type and Number:
Capital Fund Program No. CA399016107

PHR Name SAN FRANCISCO HOUSING AUTHORITY	Development Number Name/IA-Wide Activities	All Funds Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Federal FY of Grant 2007 CFP	Reasons for Revised Target Dates
		Original	Revised	Original	Revised		
977-34 CAL 1-23, 1850 Pine St.	Change from carpet to linoleum tiles and common areas	7/17/09		7/17/11			
	Emergency Lighting			5/30/09		5/30/09	Work Reprogrammed
	ADA-504			6/30/09		6/30/09	Work completed by Force Account
	Fire alarm system			3/31/10		6/30/10	Work completed
	Boiler Replacement			7/17/09			Work Reprogrammed
588-41 CAL 4-29 345 Asquello	Vent Covers			3/31/11		3/31/11	Work completed by Force Account
	ADA-504			5/30/09		6/30/09	Work completed by Force Account
	Emergency Lighting			5/30/09		9/30/09	Work completed by Force Account
984-39 CAL 4-35, 2698 California St.	Exterior Handrails			1/23/108		3/31/09	Work completed by Force Account
	Emergency Lighting			5/30/09		9/30/09	Work completed by Force Account
978-17 CAL 4-18(5), Ross Park	Sewer Improvement			9/30/08		2/31/08	Work completed
	Emergency Lighting			9/30/08		12/31/08	Work completed by Force Account
986-40 CAL 4-31 25 Sanchez	Emergency Lighting			5/30/09		9/30/09	Work completed by Force Account
987-46 CAL 4-39A, 939 Eddy St.	Emergency Lighting			6/30/09		9/30/09	Work completed by Force Account
	Water Pipes			6/30/09		9/30/09	Work Reprogrammed
987-47 CAL 4-38E, 951 Eddy St.	Emergency Lighting			6/30/09		9/30/09	Work completed by Force Account

Annual Statement of Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Fund (CFP-CFPRHF) Part III: Implementation Schedule		U.S. Department of Housing and Urban Development Office of Public and Indian Housing		OMB Approval No. 2577-0157 (exp. 11/30/2008)		
FHA Name: SAN FRANCISCO HOUSING AUTHORITY		Grant Type and Number: Capital Fund Program No: CASH09130407		Federal FY of Grant: 2007 CFP		
Development Number Name/HA-Wide Activities	All Funds Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates	
	Original	Revised	Original	Actual		
989-51 CAL 1-18(13), Robert Pitts	Exterior Lighting		9/30/09	3/31/10	Work completed	
	Landscaping		1/23/10/9	6/30/10	Work completed	
	Flood Protection		1/23/10/9	1/23/10/9	Work completed by F/A	
	Patio		3/31/10	3/31/10	Work completed	
	Gate & Stair Repair		9/30/09	1/23/10/9	Work completed	
	Wireless Equipments		1/23/10/8	1/23/10/8	Work completed	
	Fire Alarm		1/23/10	6/30/11	Work completed	
	504 - Modification		6/30/11	6/30/11	Work completed by Force Account	
	Emergency Lighting		6/30/09	9/30/09	Work completed by Force Account	
	Boiler		9/30/09	1/23/10/9	Work completed	
988-28 CAL 1-20, 3850-18th St & 255 Doiland	Elevator		6/30/11	6/30/11	Work completed	
	Exterior Painting		6/30/09	9/30/09	Work completed by Force Account	
	Vacant Units		9/30/08	3/31/09	Work completed by Force Account	
	Roof Repair		6/30/11	6/30/11	Work completed	
	Emergency Lighting		6/30/09	9/30/09	Work completed by Force Account	
	Boiler		6/30/11	6/30/11	Work completed	
	Emergency Lighting		6/30/09	9/30/09	Work completed by Force Account	
	File Line		9/30/09	1/23/10/9	Work completed	
	Emergency Lighting		6/30/09	9/30/09	Work completed by Force Account	
	Water Pipes		1/23/10/9	9/30/10	Work completed	
985-36 CAL 1-18 (18), 255 Woodside	ADA-504		9/30/09	3/31/09	Work completed by Force Account	
	Stair#		3/31/09	9/30/09	Work completed	
	Emergency Lighting		6/30/09	9/30/09	Work completed by Force Account	
	980-21 CAL 1-18(13), Mission Dolores	Emergency Lighting		6/30/09	9/30/09	Work completed by Force Account
		File Line		9/30/09	1/23/10/9	Work completed
		Emergency Lighting		6/30/09	9/30/09	Work completed by Force Account
		Water Pipes		1/23/10/9	9/30/10	Work completed
		ADA-504		9/30/09	3/31/09	Work completed by Force Account
		Stair#		3/31/09	9/30/09	Work completed
		Emergency Lighting		6/30/09	9/30/09	Work completed by Force Account
979-22 CAL 1-18 (18), 255 Woodside		Emergency Lighting		6/30/09	9/30/09	Work completed by Force Account
		Water Pipes		1/23/10/9	9/30/10	Work completed
		ADA-504		9/30/09	3/31/09	Work completed by Force Account
	Stair#		3/31/09	9/30/09	Work completed	
	Emergency Lighting		6/30/09	9/30/09	Work completed by Force Account	
	980-27 CAL 1-24, 200 Randolph	Emergency Lighting		6/30/09	9/30/09	Work completed by Force Account
		Water Pipes		1/23/10/9	9/30/10	Work completed
		ADA-504		9/30/09	3/31/09	Work completed by Force Account
		Stair#		3/31/09	9/30/09	Work completed
		Emergency Lighting		6/30/09	9/30/09	Work completed by Force Account

1 To be completed for the Performance and Evaluation Report or a revised Annual Statement.
2 To be completed for the Performance and Evaluation Report.

Annual Statement Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPHF) Part III: Implementation Schedule		U.S. Department of Housing and Urban Development Office of Public and Indian Housing		OMF Approval No. 2577-0157 (exp. 11/30/2008)		Federal FY of Grant:	
FHA Name: SAN FRANCISCO HOUSING AUTHORITY		Grant Type and Number: Capital Fund Program No. C45600150107		2007 CFP		Reasons for Revised Target Dates	
Development Number Home/HU/Other Activities	All Fund Obligated (Quarter Ending Date)	Original		Revised		Actual	
		Original	Revised	Original	Revised		
985-42 CAL 1-37-481-31 at Ave	Vacant Units			9/30/08		12/31/08	Work completed by FIA
	Emergency Lighting			6/30/08		9/30/08	Work completed by Force Account
	ADA-504			9/30/08		3/31/09	Work completed by Force Account
981-25 CAL 1-27-150 Ellis St	Upgrade entry, gate and fence.		7/17/09				Work Reprogrammed
	Emergency Lighting			6/30/08		1/23/10	Work completed by FIA
	Ventilation System Improvements						Work Reprogrammed
985-43 CAL 1-19(2) Mesquite	Emergency Lighting			6/30/08		9/30/09	Work completed by FIA
	Roor & Deck Repair			3/31/10		9/30/10	Work completed
	Boiler			3/31/10		6/30/10	Work completed
983-31 CAL 1-21-320-50 Clemente	Fire Line			3/31/10		6/30/10	Work completed
	Emergency Lighting			6/30/08		9/30/08	Work completed by FIA
	Upgrade entry, gate and fence			6/30/08		12/31/09	Work completed
981-32 CAL 1-28-666 Ellis St	Emergency Lighting			6/30/09		9/30/09	Work completed by FIA
	Window Replacement		7/17/09				Work Reprogrammed
	Fire Alarm						Work Reprogrammed
987-49 CAL 1-41-438-440 Turk St	Emergency Lighting			6/30/09		9/30/09	Work completed by FIA
	Admin. Office Rehabilitation			12/31/08		6/30/09	Work completed by FIA

Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates
	Original	Revised	Original	Revised	
HA-Wide Lead Abatement	7/17/09		7/17/11		Work Reprogrammed
HA-Wide Asthesis Abatement	7/17/09		7/17/11		Work Reprogrammed
Mold and Mildew Remediation	7/17/09		6/30/11		Work completed
Slack-burn patrollers decommissionation	7/17/09		7/17/11		Work Reprogrammed
HA-Wide 50/ADA reasonable accommodations (FA)	7/17/09		9/30/09		Work completed
HA-Wide fire unit repair and vacant units rehabilitation (FA)	7/17/09		9/30/09		Work completed
HA-Wide New appliances	7/17/09		7/17/11		Work Reprogrammed
HA-Wide Sidewalk repair/replacement and benches (FA)	7/17/09		9/30/10		Work completed
HA-Playground repair/replacement	7/17/09		7/17/11		Work Reprogrammed
HA-Wide Community facilities and playground	7/17/09		7/17/11		Work Reprogrammed
Hardware smoke detectors	7/17/09		7/17/11		Work Reprogrammed
Elevator upgrades	7/17/09		7/17/11		Work Reprogrammed
Surveillance cameras	7/17/09		7/17/11		Work completed
Modernization of Property Offices PHA Wide (FA)	7/17/09		12/31/09		Work completed
Landscaping	7/17/09		7/17/11		Work Reprogrammed
Roof top ventilation and heat pump improvements	7/17/09		7/17/11		Work Reprogrammed
Electrical improvements	7/17/09		7/17/11		Work Reprogrammed
Plumbing improvements	7/17/09		7/17/11		Work Reprogrammed
HVAC improvements	7/17/09		7/17/11		Work Reprogrammed
Vacant Unit Rehabilitation (FA)	7/17/09		7/17/11		Work Reprogrammed
HA Wide In-unit common space improvements, including	7/17/09		7/17/11		Work Reprogrammed
Cul-de-sacs repairs/replacement	7/17/09		7/17/11		Work Reprogrammed
Bathroom Repair	7/17/09		12/31/08		Work completed
Relocation	7/17/09		7/17/11		Work Reprogrammed
Replacement Housing and Revitalization	7/17/09		7/17/11		Work Reprogrammed
PA Trucks (2)	7/17/09		3/31/09		Work completed
Co-located Fall-Over Computer Center Install	7/17/09		7/17/11		Work Reprogrammed
APC Metered Power Distribution for Equipment Room	7/17/09		7/17/11		Work Reprogrammed
Cx300 Scan Processor Upgrade to CX 320	7/17/09		12/31/10		Work completed
2 Color Laser Printers	7/17/09		6/30/09		Work completed
Banking Services Scanner	7/17/09		7/17/11		Work Reprogrammed
Plan Scanner HD/Mod	7/17/09		9/30/10		Work completed

NON-DWELLING EQUIPMENT

Actual Statement of Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFPRP-RF) Part III: Implementant Schedule		U.S. Department of Housing and Urban Development Office of Public and Indian Housing Grant Type and Number Capital Fund Program No: CA3900150107		2007 CFP Reasons for Revised Target Dates			
FHA Name: SAN FRANCISCO HOUSING AUTHORITY		Development Number Name/NA-Wide Activities		All Funds Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)	
		Original	Revised	Original	Revised	Actual	Actual
MANAGEMENT IMPROVEMENTS (R 20% OF TOTAL GRANT)	Computer Sys Upgrade	7/17/09	12/31/10	7/17/11	7/17/11	12/31/10	Work completed
	Windows Server 2003 Enterprise upgrades	7/17/09	6/30/10	7/17/11	7/17/11	6/30/10	Work completed
	EMC VMWare Operating System virtualization	7/17/09	9/30/10	7/17/11	7/17/11	9/30/10	Work completed
	Employee security	7/17/09	12/31/09	7/17/11	7/17/11	12/31/09	Work completed
	Community Supportive Services	7/17/09	12/31/09	7/17/11	7/17/11	12/31/09	Work completed
ADMINISTRATION (R 10% of total Grant)	Administration	7/17/09	12/31/07	7/17/11	7/17/11	12/31/07	Work completed
	AFE Consultants	7/17/09	7/17/09	7/17/11	7/17/11	7/17/11	Work completed
FEES AND COSTS	A&E Contracting (Inspecting/Prog. Mgr)	7/17/09	3/31/11	7/17/11	7/17/11	3/31/11	Work completed
	Lead Testing		6/30/11			6/30/11	Work completed
	Asbestos Testing		6/30/11			6/30/11	Work completed
	Operating Subsidy	7/17/09	12/31/07	7/17/11	7/17/11	12/31/07	Work completed
OPERATING SUBSIDY (R 25% CF TOTAL GRANT)							



2012 CAPITAL FUND PROGRAM
ANNUAL SUBMISSION

P&ER FOR 2008 CFP AS OF 3/31/12

PHA Name: SAN FRANCISCO HOUSING AUTHORITY		Capital Fund Grant Number: CA39P00150108 Replacement Housing Factor No:		FFY of Grant Approval: 2008	
Original Annual Statement X Performance and Evaluation Report for Program Year Ending: 03/31/2012		Reserve for Disasters/ Emergencies		Revised Annual Statement/Revision Number: Final Performance and Evaluation Report	
Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost ²	
		Original	Revised ¹	Obligated	Expended
1	Total non-CFP Funds	\$0	\$0	\$0	\$0
2	1406 Operations (May not exceed 20% of line 20)	\$ 2,732,330	\$ 2,732,330	\$ 2,732,330	\$ 2,732,330
3	1408 Management Improvements (May not exceed 20% of line 20)	\$ 2,709,706	\$ 2,472,290	\$ 2,472,290	\$ 2,485,210
4	1410 Administration (May not exceed 10% of line 20)	\$ 1,366,165	\$ 1,366,165	\$ 1,366,165	\$ 1,366,165
5	1411 Audit	\$0	\$0	\$0	\$0
6	1415 Liquidated Damages	\$0	\$0	\$0	\$0
7	1430 Fees and Costs	\$ 1,935,725	\$ 1,722,944	\$ 1,722,944	\$ 1,600,754
8	1440 Site Acquisition	\$0	\$0	\$0	\$0
9	1450 Site Improvement	\$ 105,988	\$ 81,887	\$ 81,887	\$ 79,887
10	1460 Dwelling Structures	\$ 4,641,733	\$ 5,094,644	\$ 5,094,644	\$ 5,092,552
11	1465.1 Dwelling Equipment---Nonexpendable	\$ 50,000	\$ 50,000	\$ 50,000	\$ 50,000
12	1470 Nondwelling Structures	\$0	\$0	\$0	\$0
13	1475 Nondwelling Equipment	\$ 24,330	\$ 24,330	\$ 24,330	\$ 24,329
14	1485 Demolition	\$0	\$0	\$0	\$0
15	1490 Replacement Reserve	\$0	\$0	\$0	\$0
16	1492 Moving to Work Demonstration	\$0	\$0	\$0	\$0
17	1495.1 Relocation Costs	\$ 95,675	\$ 117,062	\$ 117,062	\$ 117,062
18	1499 Mod used for Development	\$ -	\$0	\$0	\$0
19	1502 Contingency (May not exceed 8% of line 20)	\$0	\$0	\$0	\$0
20	Amount of Annual Grant (Sum of lines 2-19)	\$13,661,652	\$13,661,652	\$13,661,653	\$13,528,289
21	Amount of line 20 Related to LBP Activities	\$ 3,145,562	\$ 3,123,224	\$ 3,123,224	\$ 3,072,228
22	Amount of line 20 Related to Section 504 compliance	\$ 64,167	\$ 83,460	\$ 83,460	\$ 74,153
23	Amount of line 20 Related to Security	\$ 2,049,912	\$ 2,049,912	\$ 2,049,912	\$ 2,049,912
24	Amount of line 20 Related to Energy Conservation Measures	\$ 64,895	\$ 81,451	\$ 81,451	\$ 81,451

Annual Statement / Performance and Evaluation Report
 Capital Fund Program (CGP) Part I: Summary

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

OMB Approval No. 2577-0157
 (exp. 11/30/2020)

PHA Name: SAN FRANCISCO HOUSING AUTHORITY		Capital Fund Grant Number: CA39P00150108 Replacement Housing Factor No.		FFY of Grant Approval: 2008
Original Annual Statement Performance and Evaluation Report for Program Year Ending: 03/31/2012 Signature of Executive Director		Reserve for Disasters/ Emergencies Revised Annual Statement/Revision Number: _____ Final Performance and Evaluation Report		
X Henry A. Alvarez III, Executive Director		Date 07/15/12	Signature of Public Housing Director/Programs A X	

- 1 To be completed for the Performance and Evaluation Report.
- 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
- 3 PHAs with under 250 units in management may use 100% of CFP Grants for operations.
- 4 RHIF funds shall be included here.

AMP #	Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Proposed Work ²
					Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
	OPERATING SUBSIDY (@ 20% OF TOTAL	Operating Subsidy	1406		\$ 2,732,330	\$ 2,732,330	\$ 2,732,330	\$ 2,732,330	Work completed
	MANAGEMENT	Subtotal Operating Subsidy			\$ 2,732,330	\$ 2,732,330	\$ 2,732,330	\$ 2,732,330	
	IMPROVEMENTS	Improve security	1408	100%	\$ 2,049,912	\$ 2,049,912	\$ 2,049,912	\$ 2,049,912	Work completed
		Community Supportive Services/OFH Staffing	1408	100%	\$ 570,003	\$ 332,587	\$ 332,587	\$ 332,587	Work completed
	(@ 20% OF TOTAL GRANT)	Asset Management training/Software enhancement	1408	100%	\$ 57,201	\$ 43,581	\$ 43,581	\$ 43,581	Work completed
	13,661,652 x 20% = 2,732,330	Computer Software	1408	100%	\$ 32,590	\$ 46,210	\$ 46,210	\$ 39,131	Work in Progress
	ADMINISTRATION	Subtotal Management Improvements:			\$ 2,709,706	\$ 2,472,290	\$ 2,472,290	\$ 2,465,210	
		Administration of CFP 10% of total Grant	1410		\$ 1,366,165	\$ 1,366,165	\$ 1,366,165	\$ 1,366,165	Work completed
	FEEES AND COSTS	Subtotal administration:			\$ 1,366,165	\$ 1,366,165	\$ 1,366,165	\$ 1,366,165	
		Asbestos Testing	1430	As Req.	\$ 118,375	\$ 56,383	\$ 56,383	\$ 56,383	Work completed
		Lead Testing	1430	As Req.	\$ 132,500	\$ 81,599	\$ 81,599	\$ 81,599	Work completed
		A/E Consultants	1430	As Req.	\$ 1,453,608	\$ 1,330,290	\$ 1,330,290	\$ 1,208,100	Work in progress
		A&E staffing (Inspectors/Proj. Mgr)	1430	As Req.	\$ 226,244	\$ 249,672	\$ 249,672	\$ 249,672	Work completed
		PHA Wide - Hazard Testing	1430	As Req.	\$ 5,000	\$ 5,000	\$ 5,000	\$ 5,000	Work completed
		Subtotal Fees and Costs:			\$ 1,935,725	\$ 1,722,944	\$ 1,722,944	\$ 1,600,754	
	PHA-Wide:	Gutter/Downspout replacement	1450	As Req.	\$ -	\$ -	\$ -	\$ -	Re-programmed
		HA-Wide Sidewalk repair/replacement and fences (FA)	1450	As Req.	\$ -	\$ -	\$ -	\$ -	Re-programmed
		HA-Playground repairs/replacement	1450	As Req.	\$ -	\$ -	\$ -	\$ -	Re-programmed
		HA-Wide Lead Abatement	1460	As Req.	\$ -	\$ -	\$ -	\$ -	Re-programmed
		HA-Wide Asbestos Abatement	1460	As Req.	\$ -	\$ -	\$ -	\$ -	Re-programmed
		Mold and Mildew Remediation	1460	As Req.	\$ 1,085	\$ 1,085	\$ 1,085	\$ 1,085	Work completed
		Blood-born pathogens decontamination	1460	As Req.	\$ -	\$ -	\$ -	\$ -	Re-programmed
		HA-Wide 504/ADA reasonable accommodations (FA)	1460	As Req.	\$ -	\$ -	\$ -	\$ -	Re-programmed
		HA-Wide fire unit repair	1460	As Req.	\$ -	\$ -	\$ -	\$ -	Re-programmed to R. Plits
		Handwire smoke detectors	1460	As Req.	\$ -	\$ -	\$ -	\$ -	Re-programmed
		Elevator upgrades	1460	As Req.	\$ -	\$ -	\$ -	\$ -	Re-programmed
		Landscaping and tree trimming	1450	As Req.	\$ -	\$ -	\$ -	\$ -	Re-programmed
		Roof top ventilation	1460	As Req.	\$ -	\$ -	\$ -	\$ -	Re-programmed
		Electrical improvements	1460	As Req.	\$ -	\$ -	\$ -	\$ -	Re-programmed
		Plumbing improvements	1460	As Req.	\$ -	\$ -	\$ -	\$ -	Re-programmed
		HVAC improvements	1460	As Req.	\$ -	\$ -	\$ -	\$ -	Re-programmed
		Vacant Unit Rehabilitation (FA)	1460	As Req.	\$ -	\$ -	\$ -	\$ -	Re-programmed to AMP
		HA Wide interior common space Improvements, Including furnishings, fixtures and equipment (FA)	1460	As Req.	\$ -	\$ -	\$ -	\$ -	Re-programmed
		Window	1460	As Req.	\$ -	\$ -	\$ -	\$ -	Work reprogrammed
		HA-Wide New appliances	1465	As Req.	\$ 50,000	\$ 50,000	\$ 50,000	\$ 50,000	Work completed
		Surveillance cameras	1475	As Req.	\$ -	\$ -	\$ -	\$ -	Re-programmed
		Relocation	1495	As Req.	\$ -	\$ -	\$ -	\$ -	Work reprogrammed
		Replacement Housing and Revitalization	1499	As Req.	\$ -	\$ -	\$ -	\$ -	Re-programmed
		Subtotal PHA Wide:			\$ 51,085	\$ 51,085	\$ 51,085	\$ 51,085	

PHA Name:		Capital Fund Grant Number		FFY of Grant Approval:					
SAN FRANCISCO HOUSING AUTHORITY		CA39P00150108		2008					
AMP #	Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost	Funds Obligated ²	Total Actual Cost Funds Expended ²	Status of Proposed Work ²
		Original	Revised ¹						
966	966-01 CAL 1-1, Holly Courts			1460	100%	\$ -	\$ -	\$ -	Work reprogrammed
		\$ 1,700	\$ 1,700	1460		\$ 1,700	\$ 1,700	\$ 1,700	Work completed
		\$ 13,130	\$ 13,130	1460	100%	\$ 13,130	\$ 13,130	\$ 13,130	Work completed
968	968-03 CAL 1-3, Sunnydale			1450	100%	\$ -	\$ -	\$ -	Work reprogrammed
		\$ 8,555	\$ 8,250	1460		\$ 8,250	\$ 8,250	\$ 8,250	Work completed
		\$ -	\$ -	1450	100%	\$ -	\$ -	\$ -	Work reprogrammed
		\$ -	\$ 272,058	1460		\$ 272,058	\$ 272,058	\$ 272,058	Work completed
967	967-02 CAL 1-2 Potrero Terrace			1450	As Req.	\$ -	\$ -	\$ -	Work reprogrammed
		\$ 1,229,215	\$ 1,325,699	1460	100%	\$ 1,325,699	\$ 1,325,699	\$ 1,325,699	Work Completed - FA
		\$ -	\$ -	1460	100%	\$ -	\$ -	\$ -	Re-programmed
971	971-08 Cal 1-9 Potrero Annex			1450		\$ -	\$ -	\$ -	Work completed
		\$ 2,935	\$ 2,935	1460		\$ 2,935	\$ 2,935	\$ 2,935	Work completed by F/A
		\$ -	\$ -	1460		\$ -	\$ -	\$ -	Work reprogrammed
970	970-07 CAL 1-9, Westbrook			1450	100%	\$ -	\$ -	\$ -	Work reprogrammed
		\$ -	\$ -	1460	As Req.	\$ -	\$ -	\$ -	Work reprogrammed
		\$ 848,212	\$ 822,102	1460	100%	\$ 822,102	\$ 822,102	\$ 822,102	Work completed by F/A
966	966-11 CAL 1-1B, Alemany			1460	As Rec.	\$ -	\$ -	\$ -	Work reprogrammed
		\$ 1,985	\$ 1,985	1460	As Req.	\$ 1,985	\$ 1,985	\$ 1,985	Work completed
		\$ 282	\$ 282	1460	100%	\$ 282	\$ 282	\$ 282	Work completed - FA
		\$ 1,800	\$ 1,800	1460	100%	\$ 1,800	\$ 1,800	\$ 1,800	Work completed - FA
973	973-12 CAL 1-17A, Hunters' Point Hunters Point West			1450	100%	\$ -	\$ -	\$ -	Work reprogrammed
		\$ 2,000	\$ 4,000	1450	100%	\$ 4,000	\$ 4,000	\$ 2,000	Work in progress
		\$ 716,586	\$ 719,621	1460	100%	\$ 719,621	\$ 719,622	\$ 719,622	Work completed by F/A
973	973-13 CAL 1-17A, Hunters' Point			1460	100%	\$ 255,903	\$ 255,903	\$ 255,903	Work completed by F/A
974	974-15 CAL 1-18(3) Hunters' View Sewer Relocation			1450		\$ 55,000	\$ 26,899	\$ 26,899	Work completed - FA
		\$ 1,172,716	\$ 1,173,653	1460	As Req.	\$ 1,173,653	\$ 1,173,653	\$ 1,173,653	Work completed by F/A
		\$ 94,275	\$ 115,562	1460	As Req.	\$ 115,562	\$ 115,562	\$ 115,562	Work completed

PHA Name:	SAN FRANCISCO HOUSING AUTHORITY		Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct. No.	Quantity	Total Estimated Cost:			Total Actual Cost		FFY of Grant Approval:	Status of Proposed Work ²
	CA39P00150108						Original	Revised1	Funds Obligated2	Funds Expended2			
975	975-16	CAL 1-18(4), Alice Griffith Security Booth	Landscaping	1450	100%	\$ 48,988	\$ 48,988	\$ 48,988	\$ 48,988	\$ -	\$ -	2008	Work completed
			Boiler	1460	100%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		Work re-programmed
			ADA-504	1460	100%	\$ 14,895	\$ 31,451	\$ 31,451	\$ 31,451	\$ -	\$ -		Work completed
			Asbestos	1460	100%	\$ 1,200	\$ 1,200	\$ 1,200	\$ 1,200	\$ -	\$ -		Work completed
			Vacant Units (P-14)	1460		\$ 10,420	\$ 10,420	\$ 10,420	\$ 10,420	\$ -	\$ -		Work completed
				1460		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		Reprogram
972	972-10	CAL 1-15, Ping Yuen	ADA-504	1460	100%	\$ 16,239	\$ 22,262	\$ 22,262	\$ 22,262	\$ -	\$ -		Work completed by F/A
972	972-24	CAL 1-36, 227 Bay Street	Ventilation System	1460	100%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		Work re-programmed
969	969-08	CAL 1-8, Westside Courts	Water main and sewer improvements (Phase I)	1460	100%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		Work re-programmed
			Parking Lot	460		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		Work re-programmed
			ADA-504	1460		\$ 15,376	\$ 15,376	\$ 15,375	\$ 15,375	\$ -	\$ -		Work completed by F/A
			Vacant Units	1460		\$ 15,263	\$ 15,263	\$ 15,263	\$ 15,263	\$ -	\$ -		Work completed by F/A
986	986-41	CAL 1-29, 345 Arguello St	Ventilation System	1460	100%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		Work re-programmed
986	986-40	CAL 1-31, 25 Sanchez	ADA/504	1460		\$ 4,144	\$ 4,144	\$ 4,144	\$ 4,144	\$ -	\$ -		Work completed by F/A
987	987-47	CAL 1-39B, 951 Eddy St	Sewer Improvements	1450	100%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		Work re-programmed
988	988-51	CAL 1-43, Robert Pitts	Fire Alarm - (F/A Change Order)	1460		\$ 93,043	\$ 17,232	\$ 171,232	\$ 171,232	\$ -	\$ -		Work in progress by F/A
			Fire Units Repair	1460		\$ 199,291	\$ 199,027	\$ 199,027	\$ 199,027	\$ -	\$ -		Work completed by F/A
			Signs	1460		\$ 409	\$ 409	\$ 409	\$ 409	\$ -	\$ -		Work completed
			Relocation	1495		\$ 1,400	\$ 1,400	\$ 1,400	\$ 1,400	\$ -	\$ -		Work completed
985	985-43	CAL 1-19 (2), 1750 McAllister	Fire alarm system	1480	100%	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -		Work re-programmed
985	985-36	CAL 1-34, Randolph	LBP Stabilization	1460		\$ 2,000	\$ 2,000	\$ 2,000	\$ 2,000	\$ -	\$ -		Work completed

PHA Name:		Capital Fund Grant Number		FFY of Grant Approval:						
SAN FRANCISCO HOUSING AUTHORITY		CA39P00150108		2008						
AMP #	Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Proposed Work ²	
					Original	Revised ¹	Funds Obligated ²	Funds Expended ²		
980	980-21 CAL 1-18(13) Mission Del ADA-504		1460		\$ -	\$ 6,508	\$ 6,508	\$ 6,508	Work completed by FIA	
983	983-31 CAL 1-21-320/330 Clemer St/eg Improvement ADA-504		1460 1460		\$ -	\$ 9,343	\$ 9,343	\$ 9,343	Work re-programmed Work completed by FA	
981	981-25 CAL 1-27-350 Ellis St	Ventilation System	1460	100%	\$ -	\$ -	\$ -	\$ -	Re-Programmed	
987	987-49 Cal 1-41 440 Turk	Emergency Lighting	1460		\$ 5,606	\$ 5,606	\$ 5,606	\$ 5,606	Work completed by FA	
NON-DWELLING										
Subtotal Developments:					\$ 4,842,311	\$ 5,292,508	\$ 5,292,510	\$ 5,288,416		
Go-located Fall-Over Computer Center Install (Phase 1)					1475	100%	\$ -	\$ -	\$ -	Work re-programmed
Computer Room/HVAC Upgrade					1475	100%	\$ -	\$ -	\$ -	Work re-programmed
Transcriber System					1475	100%	\$ -	\$ -	\$ -	Re-programmed
Check Printer for Accounts Payable					1475	100%	\$ -	\$ -	\$ -	Re-programmed
Asset Management Training Equipment (Projector, video equipment)					1475	100%	\$ 3,733	\$ 3,733	\$ 3,733	Work completed
Car purchase for CFP Inspectors and PMs					1475	100%	\$ -	\$ -	\$ -	Re-programmed
Equipment					1475	100%	\$ 20,597	\$ 20,597	\$ 20,597	Work completed
Subtotal Non-dwelling Equipment:					\$ 24,330	\$ 24,330	\$ 24,330	\$ 24,330	\$ 24,329	
TOTAL GRANT:					\$ 13,661,652	\$ 13,661,652	\$ 13,661,653	\$ 13,528,289		

PHA Name: SAN FRANCISCO HOUSING AUTHORITY	Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Federal FY of Grant: 2008 CFP	Reasons for Revised Target Dates	
		Original	Revised	Actual	Revised			Actual
		Original	Actual	Original	Revised			Actual
966-01 CAL 1-1, Holly Courts	Exterior Improvements, painting Lead Abatement 504 Modification	7/17/2010 7/17/2010 7/17/2010		6/30/2009 9/30/2009	7/17/2012 7/17/2012	12/31/2009 12/31/2009	Work reprogrammed Work completed Work completed	
968-03 CAL 1-3, Sunmydale	Site work, Erosion stabilization Electrical Hand rails replacement Vacant Units	7/17/2010 7/17/2010 7/17/2010		6/30/2009 6/30/2010	7/17/2012 7/17/2012	9/30/2010 12/31/2010	Work reprogrammed Work completed Work reprogrammed Work completed	
967-02 CAL 1-2 Potrero Terrace	Site Electrical Improvements (Phase I) Vacant Unit Repairs Vacant Unit Contract	7/17/2010 7/17/2010 7/17/2010		3/31/2009	7/17/2012	12/31/2012	Work reprogrammed Work Completed by FA Work reprogrammed	
971-08 CAL 1-8 Potrero Annex	Site Improvement ADA 504 Modification Vacant Units	7/17/2010 7/17/2010		6/30/2010 6/30/2009	7/17/2012	2/31/2009	Work completed Work completed by FA Work reprogrammed	
970-07 CAL 1-9, Westbrook	Landscaping and irrigation Bathrooms repairs/Improvements (Phase I) Vacant Unit Repairs	7/17/2010 7/17/2010 7/17/2010		3/31/2009	7/17/2012	9/30/2010	Work reprogrammed Work reprogrammed Work completed by FA	
966-11 CAL 1-16, Alemany	Kitchen sink and countertop replacement (Phase I) Pigeon Control Vacant Unit Repairs ADA 504 Modification	7/17/2010 7/17/2010 7/17/2010		3/31/2009 3/31/2009 3/31/2009	7/17/2012	12/31/2009 9/30/2009 9/30/2009	Work reprogrammed Work completed Work completed by FA Work completed by FA	
973-12 CAL 1-17A, Hunters Point West	Tree Trimming Site Improvement Vacant Unit Repairs	7/17/2010 7/17/2010 7/17/2010		3/31/2009 3/31/2009	7/17/2012	12/31/2009	Work reprogrammed Work in progress Work completed by FA	
973-13 CAL 1-17A Hunters Point East	Vacant Units Repairs	7/17/2010		3/31/2009	7/17/2012	12/31/2009	Work completed by FA	
974-15 CAL 1-18(3) Hunters View	Sewer Relocation Vacant Unit Repairs	7/17/2010 7/17/2010 7/17/2010		6/30/2009 3/31/2009 3/31/2009	7/17/2012	6/30/2010 12/31/2009	Work completed by FA Work in progress Work completed by FA	

Part III: Implementation Schedule

PHA Name: **SAN FRANCISCO HOUSING AUTHORITY**

Grant Type and Number: **Capital Fund Program No: CA39P00150108**

Federal FY of Grant: **2008 CFP**

Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)			All Funds Expended (Quarter Ending Date)			Reasons for Revised Target Dates
	Original	Revised	Actual	Original	Revised	Actual	
975-16	7/17/2010		3/31/2009	7/17/2012		9/30/2009	Work completed
CAL 1-18(4) Alice Griffith	7/17/2010		3/31/2009	7/17/2012		12/31/2008	Work reprogrammed
Landscaping	7/17/2010		3/31/2009	7/17/2012		12/31/2009	Work completed
Security Booth	7/17/2010		9/30/2009	7/17/2012		12/31/2009	Work completed
Roller	7/17/2010			7/17/2012			Work reprogrammed
ADA 504 Modification	7/17/2010			7/17/2012			
Asbestos	7/17/2010			7/17/2012			
Vacant Units Repair	7/17/2010			7/17/2012			
972-10							
CAL 1-15 Ping Yuen	7/17/2010		9/30/2009	7/17/2012		9/30/2009	Work completed by FA
ADA 504 Modification							
972-24							
CAL 1-36, 227 Bay Street	7/17/2010			7/17/2012			Work reprogrammed
Ventilation System							
969-06							
CAL 1-8, Westside Courts	7/17/2010			7/17/2012			Work reprogrammed
Water main and sewer improvements (Phase I)							
Parking Lot	7/17/2010			7/17/2012			Work reprogrammed
ADA 504 Modification	7/17/2010		9/30/2009	7/17/2012		12/31/2009	Work completed by FA
Vacant Units Repair	7/17/2010		3/31/2009	7/17/2012		9/30/2009	Work completed by FA
988-41							
CAL 1-29, 345 Arguello St.	7/17/2010			7/17/2012			Work reprogrammed
Ventilation System							
986-40							
CAL 1-31 25 Sanchez	7/17/2010		6/30/2009	7/17/2012		12/31/2009	Work completed by FA
ADA 504 Modification							
987-47							
CAL 1-39E, 951 Eddy St.	7/17/2010			7/17/2012			Work reprogrammed
Sewer Improvements							
988-51							
CAL 1-43 Robert Pitts	7/17/2010		3/31/2009	7/17/2012		12/31/2009	Work in progress by FA
Fire alarm system							
Fire Unit Repair	7/17/2010		12/31/2009	7/17/2012		12/31/2009	Work completed by FA
Signs	7/17/2010		3/31/2009	7/17/2012		9/30/2009	Work completed
Relocation	7/17/2010		3/31/2009	7/17/2012		9/30/2009	Work completed
985-43							
CAL 1-19 (2), 1750 McAllister St.	7/17/2010			7/17/2012			Work reprogrammed
Fire alarm system							
985-36							
CAL 1-34, Randolph	7/17/2010		3/31/2009	7/17/2012		12/31/2009	Work completed
LRP Stabilization							
980-21							
CAL 1-18(13), Mission Dolores	12/31/2010					12/31/2010	Work completed by FA
ADA 504 Modification							

PHA Name: SAN FRANCISCO HOUSING AUTHORITY	Development Number Name/HA-Wide Activities	All Funds Obligated (Quarter Ending Date)			All Funds Expended (Quarter Ending Date)			Reasons for Revised Target Dates
		Original	Revised	Actual	Original	Revised	Actual	
983-31	Street Improvement	7/17/2010			7/17/2012			Work reprogrammed
CAL 1-21 320/330 Clementina	ADA 504 Modification	7/17/2010		9/30/2009	7/17/2012		12/31/2009	Work completed by FA
981-25	Ventilation System	7/17/2010			7/17/2012			Work reprogrammed
987-49	Emergency Lighting	7/17/2010		9/30/2009	7/17/2012		12/31/2009	Work completed by FA
PHA-Wide:	Gutter/Downspout replacement	7/17/2010			7/17/2012			Re-programmed
	HA-Wide Sidewalk repair/replacement and fences (FA)	7/17/2010			7/17/2012			Re-programmed
	HA-Playground repair/replacement	7/17/2010			7/17/2012			Re-programmed
	HA-Wide Lead Abatement	7/17/2010			7/17/2012			Re-programmed
	HA-Wide Asbestos Abatement	7/17/2010			7/17/2012			Re-programmed
	Mold and Mildew Remediation	7/17/2010		3/31/2009	7/17/2012			Work in progress
	Blood-born pathogens decontamination	7/17/2010			7/17/2012			Re-programmed
	HA-Wide 504/ADA reasonable accommodations (FA)	7/17/2010			7/17/2012			Re-programmed
	HA-Wide fire unit repair	7/17/2010			7/17/2012			Re-programmed to R. Pitts
	Hardwire smoke detectors	7/17/2010			7/17/2012			Re-programmed
	Elevator upgrades	7/17/2010			7/17/2012			Re-programmed
	Landscaping and tree trimming	7/17/2010			7/17/2012			Re-programmed
	Roof top ventilation	7/17/2010			7/17/2012			Re-programmed
	Electrical Improvements	7/17/2010			7/17/2012			Re-programmed
	Plumbing Improvements	7/17/2010			7/17/2012			Re-programmed
	HVAC improvements	7/17/2010			7/17/2012			Re-programmed
	Vacant Unit Rehabilitation (FA) - additional 100 units @ \$15,000	7/17/2010			7/17/2012			Re-programmed to AM/P
	HA Wide interior common space improvements, including furnishings, fixtures and equipment (FA)	7/17/2010			7/17/2012			Re-programmed
	Window	7/17/2010			7/17/2012			Work reprogrammed
	HA-Wide New appliances	7/17/2010		9/30/2008	7/17/2012		9/30/2009	Work completed
	Surveillance cameras	7/17/2010			7/17/2012			Re-programmed
	Relocation	7/17/2010			7/17/2012			Work reprogrammed
	Replacement Housing and Revitalization	7/17/2010			7/17/2012			Re-programmed
NON-DWELLING EQUIPMENT	Co-located Fail-Over Computer Center Install	7/17/2010			7/17/2012			Work Re-programmed
	Computer Room/HVAC Upgrade	7/17/2010			7/17/2012			Work Re-programmed
	Transcriber System	7/17/2010			7/17/2012			Work Re-programmed
	Check Printer for Accounts Payable	7/17/2010			7/17/2012			Work Re-programmed
	Asset Management Training Equipment (Projector, video equipment, projection screen, video cart)	7/17/2010		9/30/2009	7/17/2012		12/31/2009	Work completed

Annual Statement/Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF): Part III: Implementation Schedule		U.S. Department of Housing and Urban Development Office of Public and Indian Housing		OMB Approval No. 2577-0157 (exp. 11/30/2008)		
PHA Name: SAN FRANCISCO HOUSING AUTHORITY		Grant Type and Number Capital Fund Program No: CA39P00150108		Federal FY of Grant: 2008 CFP		
Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)			All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates
	Original	Revised	Actual	Original	Actual	
	Car purchase for CFP Inspectors and PMS Equipment	7/17/2010		12/31/2009	7/17/2012	Work Reprogrammed
	Improve security	7/17/2010		3/31/2009	7/17/2012	Work completed
	Community Supportive Services/OFH Staffing	7/17/2010			9/30/2010	Work completed
	Asset Management training/Software enhancement	7/17/2010		12/31/2008		Work in progress
	Computer Software	7/17/2010		12/31/2009	7/17/2012	Work completed
	Administration of CFP 10% of total Grant	7/17/2010		3/31/2008	7/17/2012	Work completed
	Asbestos Testing	7/17/2010			7/17/2012	Work in progress
	Lead Testing	7/17/2010			7/17/2012	Work in progress
	A/E Consultants	7/17/2010			7/17/2012	Work in progress
	A&E staffing (Inspectors/Proj. Mgr)	7/17/2010		12/31/2010	7/17/2012	Work completed
	PHA Wide - Hazard Testing	7/17/2010		3/31/2009	7/17/2012	Work completed
	Operating Subsidy	7/17/2010		12/31/2008	7/17/2012	Work completed
	(@ 20% OF TOTAL GRANT)					



2012 CAPITAL FUND PROGRAM
ANNUAL SUBMISSION

P&ER FOR 2009 CFP AS OF 3/31/12

Part I: Summary		Grant Type and Number		Federal FY of Grant:	
PHA Name: SAN FRANCISCO HOUSING AUTHORITY		Capital Fund Grant Number: CA39P00150109		2009	
PHA Name: SAN FRANCISCO HOUSING AUTHORITY		Replacement Housing Factor No:		FFY of Grant Approval:	
Date of CFFP:		Reserve for Disasters/ Emergencies		Revised Annual Statement/Revision Number:	
Original Annual Statement		Performance and Evaluation Report for Program Year Ending: 03/31/2012		Final Performance and Evaluation Report	
Line No.	Summary by Development Account	Total Estimated Cost	Revised ¹	Obligated	Expended
1	Total non-CFP Funds	\$0	\$0	\$0	\$0
2	1406 Operations (may not exceed 20% of line 21) ³	\$2,723,685	\$2,723,685	\$2,723,685	\$2,723,685
3	1408 Management Improvements	\$2,723,685	\$2,723,685	\$2,723,685	\$2,686,121
4	1410 Administration (may not exceed 10% of line 21)	\$1,361,843	\$1,361,843	\$1,361,843	\$1,361,843
5	1411 Audit	\$0	\$0	\$0	\$0
6	1416 Liquidated Damages	\$0	\$0	\$0	\$0
7	1430 Fees and Costs	\$1,229,557	\$1,229,557	\$1,229,557	\$828,318
8	1440 Site Acquisition	\$0	\$0	\$0	\$0
9	1450 Site Improvement	\$345,765	\$390,532	\$390,532	\$324,229
10	1480 Dwelling Structures	\$4,113,109	\$4,067,630	\$4,066,009	4,013,651.51
11	1485.1 Dwelling Equipment—Nonexpendable	\$50,000	\$50,000	\$50,000	\$50,000
12	1470 Non-dwelling Structures	\$195,194	\$195,194	\$195,194	\$177,376
13	1475 Non-dwelling Equipment	\$817,823	\$860,792	\$860,792	\$860,792
14	1485 Demolition	\$0	\$0	\$0	\$0
15	1492 Moving to Work Demonstration	\$0	\$0	\$0	\$0
16	1495.1 Relocation Costs	\$27,803	\$15,510	\$15,510	\$15,510
17	1499 Development Activities ⁴	\$0	\$0	\$0	\$0
18a	1501 Collateralization or Debt Service paid by the PHA				
18b	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)	\$0	\$0	\$0	\$0
20	Amount of Annual Grant (Sum of lines 2-19)	\$13,618,427	\$13,618,427	\$13,618,427	\$13,041,415
21	Amount of line 20 Related to LBP Activities	\$200,000	\$79,400	\$79,400	\$78,900
22	Amount of line 20 Related to Section 504 Activities	\$212,588	\$259,335	\$258,662	\$225,956
23	Amount of line 20 Related to Security - Soft Costs	\$1,641,740	\$1,845,318	\$1,845,318	\$1,845,318
24	Amount of line 20 Related to Security - Hard Costs	\$52,739	\$93,156	\$93,156	\$85,804
25	Amount of line 20 Related to Energy Conservation Measures	\$150,800	\$59,819	\$59,500	\$59,500
Signature of Executive Director		Date	Signature of Public Housing Director/Programs Administrator	Date	
Henry A. Alvarez III, Executive Director		7/15/2012	X		

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 263 units in management may use 100% of CFP Grants for operations.
⁴ RHF Funds shall be included here.

Part II: Supporting Pages		Capital Fund Grant Number		FFY of Grant				
PHA Name:		CA39P00150105		Approval: 2009				
AMPS #	Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Act No.	Quantity	Total Estimated Cost		Total Actual Cost	Status of Proposed Work ²
					Original	Revised ¹		
	OPERATING SUBSIDY (@ 20% OF TOTAL GRANT)	Operating Subsidy	1405		2,723,685 \$	2,723,685 \$	2,723,685 \$	Work completed
	MANAGEMENT IMPROVEMENTS (@ 20% OF TOTAL GRANT)	Subtotal Non-dwelling Equipment: Improve security Classification and compensation study Asset Management training/Software enhancement RESIDENT EMPOWERMENT STRATEGIC PLANNING MIS System	1408 1408 1403 1403 1403 1409	100% 100% 100% 100% 100%	1,641,740 \$ 1,845,318 \$ 102,405 \$ 686,357 \$ 233,300 \$ 100,000 \$	1,845,318 \$ 1,845,318 \$ 102,405 \$ 688,357 \$ - \$ 87,605 \$	2,723,685 \$ 2,723,685 \$ 1,845,318 \$ 65,440 \$ 887,757 \$ - \$ 87,605 \$	Work completed Work completed Work in progress Work in progress Re-programmed Re-programmed Re-programmed
	ADMINISTRATION	Subtotal Management Improvements: Administration of CFP 10% of total Grant	1410		2,723,685 \$	2,723,685 \$	2,686,121 \$	Work completed
	FEES AND COSTS	Subtotal Administration: A/E Consultants A/E staffing (Inspectors/Prof. Mgr.) Asbestos Testing	1430 1430 1430	As Req. As Req. As Req.	529,520 \$ 550,000 \$ 50,000 \$	1,008,202 \$ 220,355 \$ - \$	1,361,843 \$ 607,963 \$ 220,355 \$	Work in progress Work completed Re-programmed
	NON-DWELLING EQUIPMENT	Subtotal Fees and Costs: Car purchase for CFP Inspectors and PMS Computer Hardware Computers	1475 1475 1475	100% 100% 100%	1,229,520 \$ 25,000 \$ 742,823 \$	1,229,557 \$ 48,750 \$ 755,512 \$	828,318 \$ 48,741 \$ 755,512 \$	Work completed Work completed Work completed
	PHA-Wide:	Subtotal Non-Dwelling Equipment: SUB-TOTAL			767,823 \$	809,765 \$	809,757 \$	
		HA-Wide Sidewalk repair/replacement and fences (FA) HA-Playground repair/replacement Landscaping and tree trimming HA-Wide Lead Abatement HA-Wide Asbestos Abatement Mold and Mildew Remediation Blood-born pathogens decontamination HA-Wide 504/ADA reasonable accommodations (FA) HA-Wide fire unit repair Hardwire smoke detectors Elevator upgrades Rooftop ventilation Electrical Improvements Plumbing Improvements HVAC Improvements Vacant Unit Rehabilitation (FA) HA Wide interior common space improvements, including furnishings, fixtures and equipment (FA) Gutter/Downspout replacement HA-Wide New appliances Surveillance Cameras Relocation Replacement Housing and Revitalization Emergency Power	1450 1450 1450 1460 1460 1460 1460 1460 1460 1460 1460 1460 1460 1460 1460 1460 1465 1475 1495 1499 1450	As Req. As Req.	\$0 \$ \$0 \$ \$0 \$ \$50,000 \$ \$50,000 \$ \$0 \$ \$0 \$ \$50,000 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$27,022 \$ \$0 \$ \$0 \$ \$50,000 \$ \$50,000 \$ \$27,803 \$ \$0 \$ \$150,000 \$	\$0 \$ \$0 \$ \$47,700 \$ \$50,000 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$50,000 \$ \$51,025 \$ \$15,510 \$ \$0 \$ \$150,000 \$	\$0 \$ \$0 \$ \$0 \$ \$47,700 \$ \$49,425 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$0 \$ \$50,000 \$ \$51,025 \$ \$15,510 \$ \$0 \$ \$150,000 \$	Re-programmed Re-programmed Re-programmed Work in progress Work in progress Re-programmed Re-programmed Re-programmed Re-programmed Re-programmed Re-programmed Re-programmed Re-programmed Re-programmed Re-programmed Re-programmed Re-programmed Re-programmed Work completed Work completed Work completed Re-programmed Work in progress
		Subtotal PHA Wide:			8,806,556 \$	8,848,536 \$	8,409,723 \$	

1 To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
 2 To be completed for the Performance and Evaluation Report.

Annual Statement / Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB Approval No. 2577-0157
 (exp. 11/30/2008)

Part II: Supporting Pages		Capital Fund Grant Number		FFY of Grant					
PHA Name:		CA39P00150108		Approval: 2009					
AMPS #	Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acc: No.	Quantity	Total Estimated Cost:		Total Actual Cost:		Status of Proposed Work ¹
					Original	Revised ¹	Obligated ²	Expended ²	
966	CAL 1-1, HOLLY COURT	Laundry Room	1470	100%	\$ 195,194	\$ 195,194	\$ 195,194	\$ 177,376	Work in progress-FA
		Landscaping	1450	100%	\$ 47,000	\$ 46,628	\$ 46,628	\$ 46,628	Work completed
		Kitchen	1460	100%	\$ -	\$ 1,703	\$ 1,703	\$ 1,703	Work completed-FA
		Bathroom	1460	100%	\$ -	\$ 1,594	\$ 1,594	\$ 1,594	Work completed-FA
966	CAL 1-16, Alemany	Kitchen sink and countertop replacement (Phase 1)	1460	100%	\$ -	\$ -	\$ -	\$ -	Re-programmed
		Vacant Units	1480	100%	\$ 14,151	\$ 14,151	\$ 14,151	\$ 14,151	Work completed-FA
		Sidewalk Repair	1450	100%	\$ -	\$ 2,000	\$ 2,000	\$ 2,000	Work completed
		Sidewalk Repair	1450	100%	\$ -	\$ 7,618	\$ 7,618	\$ 7,618	Work completed
967	CAL 1-2, Potrero Terrace	Abate Mildew	1460	100%	\$ -	\$ 850	\$ 850	\$ 850	Work completed
		Vacant Units	1460	100%	\$ 300,280	\$ 299,069	\$ 299,069	\$ 299,069	Work in progress-FA
		Boiler Repair	1460	100%	\$ -	\$ 8,500	\$ 8,500	\$ 8,500	Work completed
		124 Brockdale, replace sewer lateral	1450	100%	\$ -	\$ -	\$ -	\$ -	Re-programmed
968	CAL 1-3, Sunnydale	Landscaping	1450	100%	\$ 84,520	\$ 53,804	\$ 53,804	\$ 53,803	Work completed
		Replace all water mains to bldg's, and isolation valves to units	1460	100%	\$ -	\$ -	\$ -	\$ -	Re-programmed
		504 - Modification	1460	100%	\$ 47,289	\$ 47,207	\$ 47,208	\$ 47,208	Work completed-FA
		Vacant Units	1460	100%	\$ -	\$ 4,634	\$ 4,634	\$ 4,634	Work completed-FA
969	CAL 1-8, Westside Court	1400 Baker #119	1460	100%	\$ 39,591	\$ 39,591	\$ 39,591	\$ 39,591	Work completed-FA
		Vacant Units	1460	100%	\$ 150,275	\$ 160,070	\$ 160,070	\$ 160,070	Work completed-FA
		504 - Modification	1460	100%	\$ 9,279	\$ 17,702	\$ 17,702	\$ 17,702	Work in progress-FA
		Vacant Units	1460	100%	\$ 239,917	\$ 146,533	\$ 146,533	\$ 146,533	Work completed-FA
970	CAL 1-9, Westbrook	504 - Modification	1460	100%	\$ 3,850	\$ 3,505	\$ 3,505	\$ 3,505	Work completed-FA
		Vacant Units	1460	100%	\$ 689,848	\$ 671,814	\$ 671,814	\$ 670,231	Work in progress-FA
		Boiler	1460	100%	\$ -	\$ 8,700	\$ 8,700	\$ 8,700	Work completed
		Exterior Repair & Painting	1460	100%	\$ -	\$ 24,000	\$ 24,000	\$ 24,000	Work completed
972	CAL 1-16, Ping Yuesh	Roofing Replacement	1460	100%	\$ -	\$ -	\$ -	\$ -	Re-programmed
		Rewire all of the electrical conduits in common areas.	1460	100%	\$ 53,000	\$ -	\$ -	\$ -	Re-programmed
		504 - Modification	1460	100%	\$ 10,148	\$ 24,904	\$ 24,280	\$ 15,149	Work in progress-FA
		Water Pipes	1460	100%	\$ -	\$ 11,500	\$ 11,500	\$ 11,500	Work completed
972	CAL 1-36, 227 Bay Street	Heating	1460	100%	\$ -	\$ 12,500	\$ 12,500	\$ 12,500	Work completed
		Replace roof fan ventilator	1460	100%	\$ -	\$ -	\$ -	\$ -	Re-programmed
		Vacant Units	1460	100%	\$ 19,198	\$ 19,198	\$ 19,198	\$ 19,198	Work completed-FA
		Vacant Units	1460	100%	\$ 51,911	\$ 57,347	\$ 57,342	\$ 57,342	Work completed-FA
973	CAL 1-17(A), Hunters Point West	504 - Modification	1460	100%	\$ 3,376	\$ 5,983	\$ 5,983	\$ 5,563	Work completed-FA
		Window	1460	100%	\$ -	\$ -	\$ -	\$ -	Work completed-FA
		Vacant Units	1460	100%	\$ 36,599	\$ 49,611	\$ 49,611	\$ 49,611	Work completed-FA
		Vacant Units	1460	100%	\$ 14,007	\$ 13,381	\$ 13,381	\$ 13,381	Work completed-FA
974	CAL 1-18(B), Hunters View	504 - Modification	1460	100%	\$ 569,526	\$ 569,526	\$ 569,526	\$ 569,526	Work completed-FA
		Vacant Units	1460	100%	\$ 8,179	\$ 4,832	\$ 4,832	\$ 4,832	Work completed-FA
		Electrical	1460	100%	\$ -	\$ -	\$ -	\$ -	Re-programmed
		Fire Unit Repair	1460	100%	\$ -	\$ -	\$ -	\$ -	Work completed-FA
973	CAL 1-17(A), Hunters Point East	Community Space	1460	100%	\$ -	\$ 38,708	\$ 38,708	\$ 38,708	Work completed-FA
		Vacant Units	1460	100%	\$ -	\$ -	\$ -	\$ -	Work completed-FA
		Vacant Units	1460	100%	\$ 13,381	\$ 13,381	\$ 13,381	\$ 13,381	Work completed-FA
		Vacant Units	1460	100%	\$ 569,526	\$ 569,526	\$ 569,526	\$ 569,526	Work completed-FA

Part II: Supporting Pages		Capital Fund Grant Number										FFY of Grant
PHA Name:		CA39P00150109										Approval: 2009
AMPS #	Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct. No	Quantity	Total Estimated Cost		Revised ¹	Total Actual Cost		Status of Proposed Work ²		
					Original			Obligated ²	Expended ¹			
975	CAL 1-18(4), Alize Griffith	504 - Modification	1460	100%	\$ 29,374	\$ 45,284	\$ 45,284	\$ 45,284	Work completed-FA			
		Sewer Lines	1450	100%	\$ 48,765	\$ -	\$ -	\$ -	Re-programmed			
		Vacant Units	1460	100%	\$ 571,758	\$ 584,670	\$ 584,670	\$ 584,670	Work completed-FA			
		Security Booth	1460	100%	\$ 2,758	\$ 2,499	\$ 2,499	\$ 2,499	Work completed-FA			
		Electrical	1460	100%	\$ 11,578	\$ 10,202	\$ 10,202	\$ 10,202	Work completed-FA			
		Handrail	1450	100%	\$ 14,480	\$ 24,980	\$ 24,980	\$ 24,980	Work completed			
		Fence	1450	100%	\$ -	\$ 39,632	\$ 39,632	\$ 32,280	Work in progress			
		Recreation Areas	1450	100%	\$ -	\$ 2,000	\$ 2,000	\$ 2,000	Work completed			
		Landscaping/Tree Trimming	1450	100%	\$ -	\$ 12,446	\$ 12,446	\$ 8,355	Work in progress			
		504 - Modification	1460	100%	\$ 2,423	\$ 1,874	\$ 1,874	\$ 1,874	Work completed-FA			
976	CAL 1-18(6), Ping Yuen North	Vacant Unit	1460		\$ -	\$ 7,369	\$ 7,369	\$ 7,369	Work completed-FA			
976	CAL 1-19 (1), 980 Pacific Ave.	Roofing Replacement	1460	100%	\$ -	\$ -	\$ -	\$ -	Re-programmed			
		Exterior Painting	1460	100%	\$ -	\$ 31,700	\$ 31,700	\$ 31,700	Work completed			
		Vacant Units	1460	100%	\$ 12,466	\$ 12,466	\$ 12,466	\$ 12,466	Work completed-FA			
977	CAL 1-23, 1860 Pine St.	Paving improvements/site work	1450	100%	\$ -	\$ -	\$ -	\$ -	Re-programmed			
		Fire Alarm System Upgrade	1460	100%	\$ -	\$ -	\$ -	\$ -	Re-programmed			
		Vacant Units	1460	100%	\$ 32,293	\$ 32,293	\$ 32,293	\$ 32,293	Work completed-FA			
		Replace roof fan ventilator (11 fans)	1460	100%	\$ -	\$ -	\$ -	\$ -	Re-programmed			
		Bulb Repair	1460	100%	\$ -	\$ 5,990	\$ 5,990	\$ 5,990	Work completed			
977	CAL 1-32, 1760 Bush St.	Roof Repair	1460	100%	\$ -	\$ 9,500	\$ 9,500	\$ 9,500	Work completed			
		Replace roof fan ventilator (18 fans)	1460	100%	\$ -	\$ -	\$ -	\$ -	Re-programmed			
		Vacant Units	1460	100%	\$ 32,665	\$ 32,665	\$ 32,665	\$ 32,665	Work completed-FA			
		504 - Modification	1460	100%	\$ 2,999	\$ 9,038	\$ 9,038	\$ 7,438	Work in progress-FA			
		Window Replacement	1460	100%	\$ -	\$ 2,424	\$ 2,424	\$ 2,424	Work completed			
978	CAL 1-18(5), Ross Parks	Roofing Replacement	1460	100%	\$ -	\$ -	\$ -	\$ -	Re-programmed			
979	CAL 1-18(10), 259 Woodside	504 - Modification	1460	100%	\$ -	\$ 5,284	\$ 5,284	\$ 5,284	Work completed-FA			
		Electrical Improvement	1460	100%	\$ -	\$ -	\$ -	\$ -	Re-programmed			
980	CAL 1-18 (13), Mission Dolores	Fire Alarm System Upgrade	1460	100%	\$ -	\$ 17,289	\$ 17,289	\$ 17,289	Work completed			
		DOORS	1460		\$ 500	\$ 500	\$ 500	\$ -	Work in Progress			
980	CAL 1-30A, 462 DuBoise St.	Exterior Painting	1460	100%	\$ -	\$ -	\$ -	\$ -	Re-programmed			
		Dry Rot Repair	1460	100%	\$ -	\$ 31,450	\$ 31,450	\$ 31,450	Work completed			
		Vacant Units	1460	100%	\$ 25,390	\$ 25,522	\$ 25,522	\$ 25,522	Work completed-FA			
980	CAL 1-34, 363 NDR	Vacant Units	1460	100%	\$ 7,362	\$ 7,362	\$ 7,362	\$ 7,362	Work completed-FA			
		Canopy	1460	100%	\$ -	\$ 1,370	\$ 1,370	\$ 1,370	Work completed			
		FIRE ALARM	1460		\$ -	\$ 1,336	\$ 1,336	\$ -	Work in Progress			
981	CAL 1-27, 560 Ellis	Vacant Units	1460	100%	\$ 49,592	\$ 49,592	\$ 49,592	\$ 49,592	Work completed-FA			
		BOILERS	1460		\$ -	\$ 1,300	\$ 1,300	\$ -	Work in Progress			
981	CAL 1-28, 666 Ellis	Vacant Units	1460	100%	\$ 13,144	\$ 13,144	\$ 13,144	\$ 13,144	Work completed-FA			

Part II: Supporting Pages		Capital Fund Grant Number		FFY of Grant Approval: 2009			
PHA Name:		CA39P00150109					
AMPS #	Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct. No.	Quantity	Total Estimated Cost	Total Actual Cost	Status of Proposed Work ²
					Original	Revised ¹	
					Obligated ²	Expended ³	
982	CAL 1-20, 385C 18th St.	Exterior Painting Elevator Upgrades Boiler Vacant Units 504 - Modification Stair Proofing Fire Alarm	1460	100%	\$ 150,000	\$ -	Re-programmed
			1460	100%	\$ 103,000	\$ 1,200	Re-programmed
			1460	100%	\$ 14,278	\$ 14,278	Work completed
			1460	100%	\$ 76,934	\$ 77,079	Work completed-FA
			1460	100%	\$ -	\$ 16,156	Work completed-FA
			1460	100%	\$ -	\$ 1,470	Work completed
			1460	100%	\$ -	\$ 760	Work in progress
983	CAL 1-21, 320/333 Clementina St.	Site Improvements including breezeway Front Entry Drainage System Vacant Units	1450	100%	\$ -	\$ 30,000	Work completed
			1450	100%	\$ -	\$ 27,782	Work completed
			1450	100%	\$ -	\$ 1,329	Work completed
			1450	100%	\$ 28,074	\$ 28,074	Work completed-FA
984	CAL 1-18(1), JFK	Vacant Units Sprinkler System	1460	100%	\$ 38,172	\$ 38,194	Work completed-FA
			1460	100%	\$ -	\$ 6,500	Re-programmed
984	CAL 1-35, 2698 California	Vacant Units Sprinkler System	1460	100%	\$ 13,463	\$ 13,483	Work completed-FA
			1460	100%	\$ -	\$ 13,195	Work completed
985	CAL 1-34, Randolph	Vacant Units	1460	100%	\$ 544	\$ 544	Work completed-FA
985	CAL 1-19(2), 1750 McAllister	504 - Modification Boiler Repair	1460	100%	\$ -	\$ 2,756	Work in progress-FA
			1460	100%	\$ -	\$ 15,420	Work completed
986	CAL 1-31, 25 Sanchez	504 - Modification Vacant Units	1460	100%	\$ 40,586	\$ 25,084	Work completed-FA
			1460	100%	\$ 17,890	\$ 17,890	Work completed-FA
986	CAL 1-28, 345 Albuque	504 - Modification	1460	100%	\$ 2,241	\$ 7,619	Work in progress-FA
986	CAL 1-37, 491 31st	Vacant Units 504 - Modification	1460	100%	\$ 15,546	\$ 15,546	Work completed-FA
			1460	100%	\$ -	\$ 11,587	Work in progress-FA
987	CAL 1-39A, 909 Edry St.	Boiler Replacement Vacant Units	1460	100%	\$ 47,803	\$ 319	Work in progress-FA
			1460	100%	\$ 22,354	\$ 22,335	Work completed-FA
987	CAL 1-41, 430 Turk St.	Fire Alarm System Upgrade Vacant Units 504 - Modification	1460	100%	\$ -	\$ -	Re-programmed
			1460	100%	\$ 20,478	\$ 20,478	Work completed-FA
			1460	100%	\$ -	\$ 2,680	Work in progress-FA
988	CAL 1-43, Robert Pkwy	Fire Alarm System Upgrade Vacant Units Electrical Improvement 504 - Modification Heater	1460	100%	\$ 250,774	\$ 271,156	Work in progress-FA
			1460	100%	\$ 86,690	\$ 94,538	Work completed-FA
			1460	100%	\$ 6,352	\$ 8,228	Work completed-FA
			1460	100%	\$ -	\$ 7,771	Work in progress-FA
			1460	100%	\$ -	\$ 17,539	Work in progress-FA
Subtotal Developments:					\$ 4,357,046	\$ 4,405,656	\$ 4,324,477
TOTAL GRANT:					\$ 13,819,427	\$ 13,616,427	\$ 13,041,415

¹ To be completed for the Performance and Evaluation Report or Revised Annual Statement.
² To be completed for the Performance and Evaluation Report

Part III: Implementation Schedule

PHA Name SAN FRANCISCO HOUSING AUTHORITY	Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)			All Funds Expended (Quarter Ending Date)			Reasons for Revised Target Dates
		Original	Revised	Actual	Original	Revised	Actual	
966-01 CAL 1-1, Holly Court	Laundry Room			3/31/2010				Work in progress-FA
	Landscaping			3/31/2010				Work completed
	Kitchen			6/30/2010			6/30/2010	Work completed-FA
966-11 CAL 1-16, Germany	Bathrooms			6/30/2010			6/30/2010	Work completed-FA
	Kitchen sink and countertop replacement. (Phase 1)	9/14/2011		12/31/2009	9/14/2013		6/30/2010	Re-programmed
	Vacant Units			9/30/2010			12/31/2010	Work completed-FA
967-02 CAL 1-2, Potrero Terrace	Sidewalk Repair							Work completed
	Sidewalk Repair			6/30/2010			8/30/2010	Work completed
	Abate Mildew			12/31/2009			12/31/2009	Work completed
968-03 CAL 1-3, Sunnydale	Vacant units			6/30/2010			6/30/2010	Work in progress-FA
	Boiler Repair			6/30/2010			6/30/2010	Work completed
	124 Brookdale, replace sewer lateral	9/14/2011						Work completed
969-06 CAL 1-8, Westside Court	Landscaping	9/14/2011		9/30/2010			9/14/2013	Re-programmed
	Replace all water mains to bldg's, and isolation	9/14/2011		9/30/2010			9/14/2013	Work in progress
	504 - Modification	9/14/2011		9/30/2010			9/30/2010	Re-programmed
970-07 CAL 1-9, Westbank	Vacant Units			9/30/2010			9/30/2010	Work completed-FA
	504 - Modification			12/31/2009			3/31/2010	Work completed-FA
	1400 Baker #119			6/30/2009			9/30/2010	Work completed-FA
971-08 CAL 1-10, Potrero Annex	504 - Modification			9/30/2010			9/30/2010	Work in progress-FA
	Vacant Units			9/30/2010			9/30/2010	Work completed-FA
	Exterior Repair & Painting			9/30/2009			9/30/2010	Work in progress-FA
972-10 CAL 1-15, Ping Yuen	Boiler			9/30/2010			9/30/2010	Work completed
	Roofing Replacement	9/14/2011		6/30/2010			12/31/2010	Work completed
	Rewire all of the electrical conduits in common areas.	9/14/2011		9/30/2010			12/31/2010	Work in progress-FA
972-24 CAL 1-36, 227 Bay Street	504 - Modification			9/30/2010			9/30/2010	Work completed
	Water Pipes			9/30/2010			9/30/2010	Work completed
	Heating			9/30/2010			9/30/2010	Work completed
972-24 CAL 1-36, 227 Bay Street	Replace roof fan ventilator	9/14/2011						Re-programmed
	Vacant Units			3/31/2010			6/30/2010	Work completed-FA

PHA Name: SAN FRANCISCO HOUSING AUTHORITY	Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates
		Original	Revised	Original	Revised	
973-12 CAL 1-17(A), Hunters Point West	Vacant Units 504 - Modification Window			6/30/2010 3/31/2010		6/30/2010 Work completed-FA 6/30/2010 Work completed-FA
973-13 CAL 1-17(A), Hunters Point East	Vacant Units			3/31/2010		6/30/2010 Work completed-FA
974-15 CAL 1-18(3), Hunters View	504 - Modification Vacant Units Electrical			12/31/2009 3/31/2010 3/31/2010		6/30/2010 Work completed-FA 6/30/2010 Work completed-FA 6/30/2010 Work completed-FA
975-16 CAL 1-18(4), Allee Griffith	Fire Unit Repair Community Space			6/30/2010		Re-programmed 6/30/2010 Work completed-FA
976-23 CAL 1-19(1), 890 Pacific Ave.	504 - Modification Sewer Lines Vacant Units Security Booth Electrical Handrail Fence Recreation Areas Landscaping/Tree Trimming			12/31/2010 6/30/2010 3/31/2010 3/31/2010 9/30/2010 6/30/2010 9/30/2010 9/30/2010		6/30/2010 Work completed-FA Re-programmed 6/30/2010 Work completed-FA 3/31/2010 Work completed-FA 6/30/2010 Work completed-FA 9/30/2010 Work completed 9/30/2010 Work in progress 9/30/2010 Work completed 6/30/2010 Work in progress
976-18 CAL 1-18(6), Ping Yuen North	504 - Modification			12/31/2009		9/31/2010 Work completed-FA
977-34 CAL 1-23, 1880 Pine St.	Roofing Replacement Exterior Painting Vacant Units	9/14/2011 9/14/2011		9/30/2010 12/31/2009	9/14/2013 9/14/2013	Re-programmed 12/31/2010 Work completed 12/31/2009 Work completed-FA
977-33 CAL 1-32, 1760 Bush St.	Fire Alarm System Upgrade Paving improvements/site work Vacant Units Replace roof fan ventilator (11 fans) Boiler Repair Roof Repair	9/14/2011 9/14/2011		6/30/2010 6/30/2010 9/30/2010	9/14/2013 9/14/2013 9/14/2013	Re-programmed Re-programmed Work completed-FA Re-programmed Work completed 3/31/2011 Work completed
977-33 CAL 1-32, 1760 Bush St.	Replace roof fan ventilator (18 fans) Vacant Units 504 - Modification Window Replacement	9/14/2011		12/31/2009 3/31/2010 9/30/2010	9/14/2013	Re-programmed Work completed-FA Work in progress-FA Work completed

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Grant Type and Number
 Capital Fund Program No: CA339P00150109

PHS Name:
SAN FRANCISCO HOUSING AUTHORITY

Development Number
 Name/HA-Wide Activities

Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates
	Original	Revised	Original	Revised	
978-17 CAL 1-18(5) Rosa Parks	9/14/2011		9/14/2013		Re-programmed
979-22 CAL 1-18(10) 255 Woodside		6/30/2010		9/30/2010	Work completed-FA Re-programmed
980-21 CAL 1-18(13) Mission Dolores	9/14/2011		9/14/2013		Work completed
986-28 CAL 1-30A_462 Duboce St	9/14/2011		9/14/2013		Re-programmed Work completed Work completed-FA
980-37 CAL 1-34_363 Noe		12/31/2009 9/30/2010		12/31/2009 9/30/2010	Work completed-FA Work completed
981-25 CAL 1-27_350 Ellis		6/30/2010		6/30/2010	Work completed-FA
981-32 CAL 1-28_666 Ellis		12/31/2009		12/31/2009	Work completed-FA
982-27 CAL 1-20_3850 18th St	9/14/2011 9/14/2011		9/14/2013 9/14/2013		Re-programmed Re-programmed Work completed Work completed-FA
984-39 CAL 1-35_2898 California		6/30/2010 12/31/2010		6/30/2010 12/31/2010	Work in progress Work in progress
983-31 CAL 1-21_320/330 Clementina St	9/14/2011		9/14/2013		Work completed Work completed Work completed Work completed-FA
984-20 CAL 1-18(1) JFK		9/30/2010		9/30/2010	Work completed-FA Re-programmed
984-39 CAL 1-35_2898 California		6/30/2010 12/31/2010		6/30/2010 12/31/2010	Work completed-FA Work completed

PHA Name: SAN FRANCISCO HOUSING AUTHORITY	Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)			All Funds Expended (Quarter Ending Date)			Federal FY of Grant: 2009 CFP Reasons for Revised Target Dates
		Original	Revised	Actual	Original	Revised	Actual	
985-36 CAL 1-34, Randolph	Vacant Units			12/31/2009			12/31/2009	Work completed-FA
985-43 CAL 1-19(2), 1750 McAllister	504 - Modification Boiler Repair			6/30/2010 6/30/2010			9/30/2010	Work in progress-FA Work completed
988-40 CAL 1-31, 25 Sanchez	504 - Modification Vacant Units			12/31/2009 6/30/2010			6/30/2010 6/30/2010	Work completed-FA Work completed-FA
986-41 CAL 1-29, 345 Arquello	504 - Modification			6/30/2010			9/30/2010	Work in progress-FA
986-42 CAL 1-37, 491 31 st	Vacant Units 504 - Modification			6/30/2010 6/30/2010			9/30/2010 9/30/2010	Work completed-FA Work in progress-FA
987-46 CAL 1-39A, 939 Eddy St	Boiler Replacement Vacant Units	9/14/2011		12/31/2009 6/30/2010		9/14/2013	6/30/2010	Work in progress Work completed-FA
987-49 CAL 1-41, 430 Turk St	Fire Alarm System Upgrade Vacant Units 504 - Modification	9/14/2011		6/30/2010 6/30/2010		9/14/2013	9/30/2010 9/30/2010	Re-programmed Work completed-FA Work in progress-FA
988-51 CAL 1-43, Robert Pitts	Fire Alarm System Upgrade Vacant Units Electrical Improvement 504 - Modification Heater			6/30/2010 6/30/2009 3/31/2010 9/30/2010 9/30/2010			9/30/2009 6/30/2010 6/30/2010 9/30/2010	Work in progress-FA Work completed-FA Work completed-FA Work in progress-FA Work in progress-FA

PHA Name: SAN FRANCISCO HOUSING AUTHORITY	Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates
		Original	Revised	Original	Revised	
NON-DWELLING EQUIPMENT	HA-Wide Lead Abatement	9/14/2011		9/14/2013		Work in progress
	HA-Wide Asbestos Abatement	9/14/2011		9/14/2013		Work in progress
	Mold and Mildew Remediation	9/14/2011		9/14/2013		Re-programmed
	Blood-born pathogens decontamination	9/14/2011		9/14/2013		Re-programmed
	HA-Wide 504/ADA reasonable accommodations	9/14/2011		9/14/2013		Re-programmed
	HA-Wide fire unit repair	9/14/2011		9/14/2013		Re-programmed
	HA-Wide New appliances	9/14/2011		9/14/2013		Work completed
	HA-Wide Sidewalk repair/replacement and fences (FA)	9/14/2011		9/14/2013		Re-programmed
	HA-Playground repairs/replacement	9/14/2011		9/14/2013		Re-programmed
	Hardwire smoke detectors	9/14/2011		9/14/2013		Re-programmed
	Elevator upgrades	9/14/2011		9/14/2013		Re-programmed
	Surveillance cameras	9/14/2011		9/14/2013		Re-programmed
	Relocation	9/14/2011		9/14/2013		Work completed
	Landscaping and tree trimming	9/14/2011		9/14/2013		Work completed
	Roof top ventilation	9/14/2011		9/14/2013		Re-programmed
Electrical Improvements	9/14/2011		9/14/2013		Re-programmed	
Plumbing Improvements	9/14/2011		9/14/2013		Re-programmed	
HVAC Improvements	9/14/2011		9/14/2013		Re-programmed	
Vacant Unit Rehabilitation (FA)	9/14/2011		9/14/2013		Re-programmed	
HA Wide interior common space improvements.	9/14/2011		9/14/2013		Re-programmed	
Gutter/Downspout replacement	9/14/2011		9/14/2013		Re-programmed	
Replacement Housing and Revitalization	9/14/2011		9/14/2013		Re-programmed	
Emergency Power	9/14/2011		9/14/2013		Re-programmed	
Car purchase for CFP Inspectors and PMs	9/14/2011		9/14/2013		Work in progress	
Computer Hardware	9/14/2011		9/30/2010		Work in progress	
Computers	9/14/2011		9/30/2010		Work completed	
MANAGEMENT	Improve security	9/14/2011		9/14/2013		Work completed
IMPROVEMENTS (@ 20% OF TOTAL GRANT)	Asset Management training/Software enhancement	9/14/2011		9/14/2013		Work in progress
	Classification & Compensation Study	9/14/2011		9/14/2013		Work in progress
	Resident Empowerment	9/14/2011		9/14/2013		Re-programmed
ADMINISTRATION	Strategic Planning	9/14/2011		9/14/2013		Work in progress
	Administration of CFP 10% of total Grant	9/14/2011		9/14/2013		Work completed
FEES AND COSTS	A/E Consultants	9/14/2011		9/14/2013		Work in progress
	A&E staffing (Inspectors/Proj. Mgr)	9/14/2011		9/14/2013		Work completed
	Asbestos Testing	9/14/2011		9/14/2013		Re-programmed
OPERATING SUBSIDY (@ 20% OF TOTAL GRANT)	Operating Subsidy	9/14/2011		9/14/2013		Work completed

Grant Type and Number
 Capital Fund Program No: CA39P00150109

Federal FY of Grant:
 2009 CFP



2012 CAPITAL FUND PROGRAM
ANNUAL SUBMISSION

P&ER FOR 2010 CFP AS OF 3/31/12

Part I: Summary		Grant Type and Number		Federal FY of Grant:	
PHA Name: SAN FRANCISCO HOUSING AUTHORITY		Capital Fund Grant Number: CA39P00150110		2010	
Replacement Housing Factor No:		Date of CFFP:		FFY of Grant Approval:	
Original Annual Statement		Reserve for Disasters/ Emergencies		Revised Annual Statement/Revision Number:	
Performance and Evaluation Report for Program Year Ending: 3/31/2012		Summary by Development Account		Final Performance and Evaluation Report	
Line No.	Total Estimated Cost	Original	Revised ¹	Obligated	Expended
1	\$0	\$0	\$0	\$0	\$0
2	\$2,713,757	\$2,713,757	\$2,713,757	\$2,713,757	\$2,713,757
3	\$2,220,000	\$2,220,000	\$2,713,757	\$2,712,268	\$2,666,669
4	\$1,356,879	\$1,356,879	\$1,356,879	\$1,356,879	\$1,356,877
5	\$0	\$0	\$0	\$0	\$0
6	\$0	\$0	\$0	\$0	\$0
7	\$1,858,447	\$1,858,447	\$1,858,447	\$1,858,447	\$702,357
8	\$0	\$0	\$0	\$0	\$0
9	\$2,070,000	\$2,070,000	\$896,106	\$894,793	\$316,736
10	\$3,065,000	\$3,065,000	\$3,131,023	\$2,577,409	\$2,271,360
11	\$30,000	\$30,000	\$484,984	\$464,984	\$464,984
12	\$173,243	\$173,243	\$0	\$0	\$0
13	\$575,000	\$575,000	\$412,479	\$412,432	\$371,904
14	\$0	\$0	\$0	\$0	\$0
15	\$0	\$0	\$0	\$0	\$0
16	\$20,000	\$20,000	\$19,344	\$19,260	\$19,260
17	\$24,908	\$24,908	\$0	\$0	\$0
18a					
18b					
19	\$0	\$0	\$0	\$0	\$0
20	\$13,568,787	\$13,568,787	\$13,568,787	\$13,010,269	\$10,903,975
21	\$375,000	\$375,000	\$179,868	\$179,868	\$59,468
22	\$75,000	\$75,000	\$197,692	\$195,579	\$147,545
23	\$2,000,000	\$2,000,000	\$2,493,757	\$2,493,757	\$2,493,757
24	\$160,000	\$160,000	\$66,271	\$66,271	\$66,272
25	\$50,000	\$50,000	\$348,486	\$302,727	\$299,031
Signature of Executive Director		Date	Signature of Public Housing Director/Programs Administrator	Date	
X Henry A. Alvarez III, Executive Director		7/15/2012	X		

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFF Grant for operations.
⁴ PHF funds shall be included here.

AMPS #	Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Capital Fund Grant Number	FFY of Grant Approval: 2010	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Proposed Work ²	
							Original	Revised ¹	Obligated ²	Funds Expended ²		
Part II: Supporting Pages												
PHA Name:												
SAN FRANCISCO HOUSING AUTHORITY												
CA39P00150110												
OPERATING SUBSIDY (@ 20% OF TOTAL GRANT)												
	Operating Subsidy				1406		2,713,757	2,713,757	2,713,757	2,713,757	Work completed	
MANAGEMENT IMPROVEMENTS (@ 20% OF TOTAL GRANT)												
	Improve Security	Subtotal Non-dwelling Equipment:			1408	100%	2,713,757	2,713,757	2,713,757	2,713,757	Work completed	
	Software and Implementation/MIS Licensing				1408	100%	2,000,000	2,493,757	2,493,757	2,493,757	Work completed	
	CP Grants Integration				1408	100%	156,000	171,490	170,031	170,031	Work completed	
		Subtotal Management Improvements:			1408	100%	65,000	48,570	48,570	22,881	Work in progress	
							2,220,000	2,713,757	2,712,238	2,686,669		
ADMINISTRATION												
	Administration of CFP 10% of total Grant				1410	100%	1,356,879	1,356,879	1,356,879	1,356,877	Work completed	
		Subtotal Administration:					1,356,879	1,356,879	1,356,879	1,356,877		
FEES AND COSTS												
	Consultants				1430	100%	950,000	1,394,831	1,394,831	349,092	Work in progress	
	Lead/Asbestos				1430	100%	-	153,503	153,503	43,152	Work in progress	
	A/E (includes FMs & Inspector's Salaries)				1430	100%	300,000	310,113	310,113	310,113	Work completed	
		Subtotal Fees and Costs:					1,300,000	1,858,447	1,858,447	702,357		
NON-DWELLING EQUIPMENT												
	WiFi Installation at AMPS				1475	100%	350,000	205,051	205,005	106,027	Work in progress	
	Time and Attendance Equipment				1475	100%	90,000	-	-	-	Re-programmed	
	Networking Hardware				1475	100%	85,000	157,363	157,362	135,812	Work in progress	
		Subtotal Non-Dwelling Equipment:					525,000	362,414	362,367	321,839		
		SUB-TOTAL					9,115,639	9,005,254	9,003,748	7,781,499		
PHA-Wide:												
	HA-Wide Lead Abatement				1460	100%	\$75,000	\$25,000	25,000	16,316	Work in progress	
	HA-Wide Asbestos Abatement				1460	100%	\$75,000	\$28,850	28,850	28,850	Work completed	
	Mold and Mildew Remediation				1460	100%	\$19,000	\$8,058	8,058	8,058	Work in progress	
	Lead-born pathogens decontamination				1460	100%	\$5,000	\$0	-	-	Re-programmed	
	HA-Wide 504/ADA reasonable accommodations (FA)				1460	100%	\$75,000	\$25,000	25,000	10,919	Re-programmed	
	HA-Wide vacant units rehabilitation (FA)				1460	100%	\$1,000,000	\$0	-	-	Re-programmed	
	HA-Wide fire unit repair (FA)				1460	100%	\$50,000	\$0	-	-	Re-programmed	
	HA-Wide Nest appliances				1465.1	100%	\$30,000	\$464,994	464,994	464,994	Work completed	
	HA-Wide Sidewalk repair/replacement and fences (FA)				1460	100%	\$50,000	\$0	-	-	Re-programmed	
	HA-Wide Community facilities and playground repairs/replacement				1450	100%	\$50,000	\$0	-	-	Re-programmed	
	Hardwire smoke detectors				1460	100%	\$50,000	\$0	-	-	Re-programmed	
	Elevator upgrades				1460	100%	\$50,000	\$0	-	-	Re-programmed	
	Surveillance cameras				1475	100%	\$50,000	\$50,065	50,065	50,065	Work completed	
	Modernization of Property Offices PHA Wide (FA)				1470	100%	\$73,243	\$0	-	-	Re-programmed	
	Landscaping				1450	100%	\$50,000	\$0	-	-	Re-programmed	
	Unit Lock Upgrades at Senior Buildings				1460	100%	\$50,000	\$0	-	-	Re-programmed	
	Electrical Improvements				1460	100%	\$50,000	\$49,781	3,033	3,033	Work in progress	
	Plumbing Improvements				1460	100%	\$50,000	\$0	-	-	Re-programmed	
	HVAC/Flooring ventilation and heat pump improvements				1460	100%	\$50,000	\$0	-	-	Re-programmed	
	HA Wide interior common space improvements, including furnishings, fixtures and equipment (FA)				1460	100%	\$50,000	\$0	-	-	Re-programmed	
	Gutter/Downspout replacement				1460	100%	\$30,000	\$0	-	-	Re-programmed	
	Relocation				1460	100%	\$50,000	\$0	-	-	Re-programmed	
	Replacement Housing and Revitalization				1469	100%	\$20,000	\$19,344	19,260	19,260	Work in progress	
		Subtotal PHA Wide:					2,018,151	671,103	624,280	601,496		

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
² To be completed for the Performance and Evaluation Report.

Part II: Supporting Pages		Capital Fund Grant Number		FFY of Grant				
PHA Name:		CA39P00150110		Approval: 2010				
AMPS #	Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Status of Proposed Work ²			
			Total Estimated Cost		Total Actual Cost			
			Original	Revised ¹	Obligated ²	Expended ²		
966	CAL 1-1, Holly Court	Sidewalk/walkways/concrete repairs 504 - Modification	1450 1460	100% 100%	\$ 25,000 -	\$ - 1,247	\$ - 1,247	Work in progress Work Completed-FA
966	CAL 1-16, Alamany	Sidewalk/walkways/concrete repairs Tree Removal/trimming Vacant Units	1450 1450 1460	100% 100% 100%	\$ 75,000 20,000 -	\$ 41,469 - 38,094	\$ 41,440 - 21,223	Work in progress Work in progress Work in progress
967	CAL 1-2, Potrero Terrace	504 - Modification Emergency Services	1460 1450 1460	100% 100% 100%	\$ - -	\$ 10,500 -	\$ 514 -	Work in progress Work in progress-FA Work in progress
968	CAL 1-3, Sunnydale	Vacant Units Boiler Emergency Services Side walk Repairs	1460 1460 1450 1460	100% 100% 100% 100%	\$ - -	\$ 863,385 16,500 27,000 3,718	\$ 863,385 16,500 27,000 3,718	Work in progress-FA Work completed Work in progress Work completed
968	CAL 1-3, Sunnydale	Sidewalk/walkways/concrete repairs/handrail repairs Repaving and restriping parking lots Upgrade Exterior Lighting VACANT UNITS Replace House Traps Emergency Services-SFPUC HOMELESS UNITS	1450 1450 1450 1460 1450 1460	100% 100% 100% 100% 100% 100%	\$ 150,000 85,000 50,000 -	\$ - -	\$ - -	Work in progress Work in progress Re-programmed Work completed Work completed Work in progress
969	CAL 1-8, Westside Court	Water main and sewer improvements (Phase I) 504 - Modification	1450 1460	100% 100%	\$ 150,200 -	\$ - 39,508	\$ - 33,600	Re-programmed Work in progress-FA
970	CAL 1-8, Westbrook	Replace sewer lines (Phase I); (FA) Sidewalk/walkways/concrete repairs/handrail repairs Tree Removal/trimming VACANT UNITS 504 Laundry facilities rehabilitation (Phase I); (FA)	1450 1450 1450 1460 1460 1470	100% 100% 100% 100% 100%	\$ 100,000 200,000 60,000 -	\$ - 82,397 -	\$ - 82,397 -	Re-programmed Work in progress Work in progress Work in progress Work in progress Re-programmed
971	CAL 1-10, Potrero Annex	Sidewalk/walkways/concrete repairs/handrail repairs (Phase I) Upgrade Exterior lighting Replace dry robed balconies (FA) Tree Removal/trimming Sewer rehabilitation (FA) Plumbing improvements (Phase I) 504 - Modification Boiler Vacant Units	1450 1450 1450 1450 1460 1460 1460 1460	100% 100% 100% 100% 100% 100% 100% 100%	\$ 60,000 50,000 100,000 20,000 25,000 50,000 -	\$ 18,387 -	\$ 8,333 -	Work in progress Re-programmed Re-programmed Re-programmed Re-programmed Re-programmed Work in progress-FA Work completed Work completed - FA
972	CAL 1-15, Ping Yuen	Fence & Gate Emergency Services-SFPUC requested by James Mark CONCRETE REPAIR HOMELESS UNITS	1450 1450 1460	100% 100% 100%	\$ - -	\$ 7,410 9,000 892	\$ 7,410 9,000 -	Work Completed Work in progress -

Part II: Supporting Pages		Capital Fund Grant Number		FFY of Grant				
PHA Name:		CA39P00150110		Approval: 2010				
AMPS #	Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Status of Proposed Work ²			
			Total Estimated Cost		Total Actual Cost			
			Original	Revised ¹	Obligated ²	Expended ²		
973	CAL 1-17(A), Hunters Point West	Elevator Upgrade Sidewalk Repairs Window Phone Lines 504 - Modification Sewer Vacant Units Boiler Common Space Improvement	1460	100%	\$ 450,000	\$ 40,033	\$ -	Work in progress
			1450	100%	\$ 17,131	\$ -	\$ 17,131	Work in progress
			1460	100%	\$ -	\$ 15,000	\$ 15,000	Work in progress
			1460	100%	\$ -	\$ 6,540	\$ 6,540	Work in progress
			1460	100%	\$ -	\$ 6,802	\$ 6,802	Work Completed-FA
			1450	100%	\$ -	\$ -	\$ -	Work Completed-FA
			1460	100%	\$ -	\$ 23,176	\$ 15,366	Work Completed-FA
			1460	100%	\$ -	\$ 10,896	\$ 10,896	Work in progress
			1460	100%	\$ -	\$ 2,208	\$ 2,037	Work in progress
			1450	100%	\$ 100,000	\$ -	\$ -	Re-programmed
1450	100%	\$ 53,000	\$ -	\$ -	Re-programmed			
1460	504	Sidewalk/walkways/concrete repairs (Phase I) Sewer rehabilitation (FA)			\$ 6,809	\$ 6,153	Work completed	
973	CAL 1-17(A), Hunters Point East	Sidewalk/walkways/concrete repairs (Phase I) Sewer rehabilitation (FA) Vacant Units	1450	100%	\$ 100,000	\$ 2,554	\$ 2,000	Work in progress
			1450	100%	\$ 50,000	\$ 57,873	\$ 57,873	Re-programmed
			1460		\$ -	\$ 12,835	\$ -	Work in progress
			1460	504		\$ 11,039	\$ -	Work in progress
974	CAL 1-18(3), Hunters View	Fire Unit Window Security	1460	100%	\$ -	\$ 48,545	\$ 16,084	Work in progress-FA
			1460	100%	\$ -	\$ 16,206	\$ 16,206	Work completed
975	CAL 1-18(4), Alice Griffith	Sidewalk/walkways/concrete repairs (Phase I) 504 - Modification Sewer Heating Line Vacant Units Boiler Emergency Services-SFPUC	1460	100%	\$ -	\$ 6,203	\$ 6,204	Work in progress-FA
			1450	100%	\$ 110,000	\$ -	\$ -	Re-programmed
			1460	100%	\$ -	\$ 95,780	\$ 94,738	Work in progress-FA
			1450	100%	\$ -	\$ 31,716	\$ 31,716	Work in progress-FA
			1460	100%	\$ -	\$ 192,809	\$ 192,809	Work completed
			1460	100%	\$ -	\$ 216,855	\$ 216,855	Work in progress
			1460	100%	\$ -	\$ 33,639	\$ 33,639	Work completed
			1450		\$ -	\$ 31,500	\$ 31,500	Work in progress
			1460	100%	\$ 50,000	\$ 24,911	\$ 24,911	Work in progress
			1460		\$ -	\$ 15,106	\$ 15,106	Work completed - FA
976	CAL 1-18(6), Ping Yuen North	HOMELESS UNITS	1460	100%	\$ -	\$ -	\$ -	Work in progress
			1460		\$ -	\$ 22,539	\$ -	Work completed - FA
978	CAL 1-32, 1760 Bush	HOMELESS UNITS	1460	100%	\$ -	\$ -	\$ -	Work in progress
			1460	100%	\$ -	\$ 20,612	\$ 20,612	Work completed - FA
978	CAL 1-18(5), Rosa Parks	Water Lines Sewer replacement (Phase I) Mold and Mildew Remediation Pest Control Vacant Units	1460	100%	\$ -	\$ -	\$ -	Work in progress
			1460	100%	\$ 100,000	\$ -	\$ 600	Work in progress
			1460	100%	\$ -	\$ 4,100	\$ 4,100	Work completed
			1460	100%	\$ -	\$ 49,472	\$ 49,472	Work completed
			1460		\$ -	\$ -	\$ -	Work completed
979	CAL 1-18(10), Woodside Gardens	HOMELESS UNITS	1460	100%	\$ -	\$ -	\$ -	Work in progress
			1460	100%	\$ -	\$ 22,132	\$ 22,132	Work in progress

Part II: Supporting Pages		Capital Fund Grant Number										FFY of Grant
PHA Name:		CA39P00150110										Approval: 2010
AMPS #	Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Act No.	Quantity	Total Estimated Cost		Revised ¹	Total Actual Cost		Status of Proposed Work ²		
					Original			Obligated ²	Expended ²			
		Concrete repairs and exterior waterproofing	1460	100%	\$ 192,000	\$	\$ 223,294	\$	\$ 142,638	Re-programmed		
		Electrical Generator	1460	100%	\$	\$	\$ 39,736	\$	\$	Work in progress		
		Sidewalk Repair	1460	100%	\$	\$	\$	\$	\$	Work in progress		
		504 Modification	1460	100%	\$	\$	\$	\$	\$			
980	CAL 1-18 (13), Mission Dolores	Concrete repairs, repaving of common areas	1460	100%	\$ 60,000	\$	\$ 500	\$	\$ 500	Work in progress		
		Repave Parking Lot	1450	100%	\$	\$	\$ 31,555	\$	\$ 28,399	Work in progress		
		504 - Modification	1460	100%	\$	\$	\$ 1,144	\$	\$ 1,144	Work in progress-FA		
		Install Firewall around the gas line F/A W/O # FA/11/1-401	1450	100%	\$	\$	\$ 11,376	\$	\$ 4,545	Work in progress-FA		
		SF-Utilities	1450	100%	\$	\$	\$ 2,390	\$	\$ 2,390	Work completed		
981	CAL 1-27, 350 Ellis	Repave parking lot	1450	100%	\$ 50,000	\$	\$ 25,588	\$	\$ 24,829	Work in progress		
		Rehabilitate West stairwell	1460	100%	\$ 50,000	\$	\$	\$	\$	Re-programmed		
		Replace front door/relocate entrance	1460	100%	\$ 50,000	\$	\$	\$	\$	Re-programmed		
		Boiler	1460	100%	\$	\$	\$ 36,500	\$	\$ 36,500	Work completed		
		Plumbing	1460	100%	\$	\$	\$ 2,850	\$	\$ 2,850	Work completed		
980	CAL 1-30, 462 Duboce	Pigeon Control	1460	100%	\$	\$	\$ 4,896	\$	\$ 4,895	Work completed		
		Boiler	1460	100%	\$	\$	\$ 15,620	\$	\$ 15,620	Work completed		
		Fire Alarm	1460	100%	\$	\$	\$ 1,050	\$	\$ 1,050	Work in progress		
		504	1460		\$	\$	\$ 3,277	\$	\$ 3,277			
980	CAL 1-34, 363 Noe	Repave Parking Lot	1450	100%	\$	\$	\$ 19,497	\$	\$ 17,547	Work in progress		
981	CAL 1-28, 666 Ellis	Repave parking lot	1450	100%	\$ 50,000	\$	\$ 25,499	\$	\$ 25,499	Work in progress		
982	CAL 1-20, 3650 18th	504 - Modification	1460	100%	\$	\$	\$ 3,509	\$	\$ 3,439	Work in progress-FA		
		Elevator	1460	100%	\$	\$	\$ 2,829	\$	\$ 1,768	Work in progress		
		Plumbing	1460	100%	\$	\$	\$ 425	\$	\$ 425	Work completed		
		504	1460		\$	\$	\$ 2,499	\$	\$ 2,499	Work in progress		
983	CAL 1-21, Clementina	Elevator Boiler	1460	100%	\$	\$	\$ 2,046	\$	\$ 2,046	Work completed		
			1460		\$	\$	\$ 151	\$	\$ 151	Work completed		
984	CAL 1-35, 2698 California	Exterior painting/weatherization	1460	100%	\$ 150,000	\$	\$ 1365	\$	\$ 1,365	Work in progress		
		504	1460		\$	\$	\$ 629.03	\$	\$ 629	Work completed		
		Elevator Upgrade	1460	100%	\$ 100,000	\$	\$ 0	\$	\$	Re-programmed		
984	CAL 1-18(1), JFK Towers	Exterior painting/weatherization	1460	100%	\$ 150,000	\$	\$	\$	\$	Re-programmed		
		Elevator	1460	100%	\$	\$	\$ 22,450	\$	\$ 22,450	Work completed		
985	CAL 1-19(2), 1750 McAllister	Back retaining wall rehabilitation	1450	100%	\$ 250,000	\$	\$ 306,057	\$	\$ 306,057	Work in progress		

Part II: Supporting Pages		Capital Fund Grant Number				FFY of Grant			
PIHA Name:		CA39P06150110				Approval: 2010			
AMPS #	Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Div. Acct. No.	Quantity	Total Estimated Cost		Status of Proposed Work ⁴		
					Original	Revised ¹			
					Funds Obligated ²	Funds Expended ²			
	CAL 1-31, 25 Sanchez	504 - Modification	1460	100%	\$ -	\$ 11,863	\$ 11,862	Work Completed-FA	
966	CAL 1-29, 345 Arguello	Upgrade Community Room lighting	1460	100%	\$ 10,000	\$ -	\$ -	1 Re-programmed	
	604 - Modification	Fire unit	1480	100%	\$ -	\$ 1,166	\$ 1,166	Work in progress-FA	
	CAL 1-39, 939 EDDY ST	HOMELESS UNITS	1460		\$ -	\$ -	\$ -	8,464 Work in progress-FA	
966	CAL 1-37, 491 31st Ave	504 - Modification	1460	100%	\$ -	\$ 33,384	\$ 32,860	Work in progress-FA	
968	CAL 1-43, Robert Pitts	504 - Modification	1460	100%	\$ -	\$ 6,650	\$ 6,649	Work in progress-FA	
		Sidewalk Repair	1460	100%	\$ -	\$ 21,753	\$ 14,621	Work in progress	
		Alarm System	1460		\$ -	\$ 1,088	\$ 1,088	Work Completed	
					Subtotal Developments:		\$ 3,435,000	\$ 3,890,430	\$ 2,520,921
					TOTAL GRANT:		\$ 13,566,787	\$ 13,010,269	\$ 10,903,916

Development Number Name/HA-Wilds Activities	All Fund Obligated (Quarter Ending Date)		All Fund's Expended (Quarter Ending Date)		Federal FY of Grant: 2010 CFP	Reasons for Revised Target Dates
	Original	Revised	Original	Revised		
	Actual	Actual	Actual	Actual		
966-01 CAL 1-1, Holly Court Sidewalk/walkways/concrete repairs 504 - Modification	7/14/2012		6/30/2011	7/14/2014	0/30/2011	Work in progress Work Completed -FA
966-11 CAL 1-16, Alemany Sidewalk/walkways/concrete repairs Tree Removal/trimming 504 - Modification	7/14/2012		3/31/2011 6/30/2011	7/14/2014 7/14/2014		Work in progress Work in progress Work in progress-FA
967-02 CAL 1-2, Potrero Terrace Vacant Units Boiler Emergency Services Side walk Repairs	7/14/2012		3/31/2011 6/30/2011	7/14/2014	6/30/2011 6/30/2011	Work in progress-FA Work completed Work in progress Work completed
968-03 CAL 1-3, Sunnyside Sidewalk/walkways/concrete repairs/Handrail repairs Repaving and restriping parking lots Upgrade Exterior lighting VACANT UNITS Replace House Traps Emergency Services-SFPUC	7/14/2012		9/30/2011	7/14/2014		Work in progress
969-05 CAL 1-8, Westside Court 970-07 Water man and sewer improvements (Phase I) 504 - Modification Replace sewer lines (Phase I); (FA) Sidewalk/walkways/concrete repairs/Handrail repairs	7/14/2012		6/30/2011	7/14/2014 7/14/2014	9/30/2011 9/30/2011	Work in progress Work in progress Re-programmed Work completed Work completed Work in progress
CAL 1-9, Westbrook Tree Removal/trimming VACANT UNITS	7/14/2012		3/31/2011	7/14/2014		Re-programmed Work in progress-FA Re-programmed Work in progress
971-08 CAL 1-10, Potrero Annex Laundry facilities rehabilitation (Phase I); (FA) 504 Sidewalk/walkways/concrete repairs/Handrail repairs (Phase I) Upgrade Exterior lighting Replace dry rotted balconies (FA) Tree Removal/trimming Sewer rehabilitation (FA) Plumbing improvements (Phase I) 504 - Modification Boiler Vacant Units Fence & Gate Emergency Services-SFPUC requested by James HOMELESS UNITS	7/14/2012			7/14/2014 7/14/2014 7/14/2014 7/14/2014 7/14/2014 7/14/2014 7/14/2014 7/14/2014 7/14/2014		Work in progress Re-programmed Re-programmed Re-programmed Re-programmed Re-programmed Re-programmed Work completed-FA Work completed Work in progress-FA Work Completed Work in progress

PHA Name: SAN FRANCISCO HOUSING AUTHORITY	Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Federal FY of Grant: 2010 CFP Reasons for Revised Target Dates
		Original	Revised	Original	Revised	
		Actual	Actual	Actual	Actual	
972-10 CAL 1-15, Ping Yuen	Elevator Upgrade Window Phone Lines 504 - Modification Sewer Vacant Units Boiler Common Space Improvement	7/14/2012		6/30/2011 12/31/2010 12/31/2010 3/31/2011 12/31/2010 12/31/2010 3/31/2011	7/14/2014 7/14/2014 7/14/2014 7/14/2014 7/14/2014 7/14/2014 7/14/2014	Work in progress Work in progress Work in progress-FA Work Completed-FA Work in progress Work Completed-FA Work in progress Work in progress
973-12 CAL 1-17(A), Hunters Point West	Sidewalk/walkways/concrete repairs (Phase I) Sewer rehabilitation (FA)	7/14/2012	504	12/31/2010	7/14/2014 7/14/2014	Re-programmed Re-programmed Work completed
973-13 CAL 1-17(A), Hunters Point East	Sidewalk/walkways/concrete repairs (Phase I) Sewer rehabilitation (FA) Vacant Units	7/14/2012	504	3/31/2011	7/14/2014 7/14/2014	Work in progress Re-programmed Work in progress-FA Work in progress-FA
974-15 CAL 1-18(3), Hunters View	Fire Unit Window Security 504	7/14/2012		12/31/2010 12/31/2010	7/14/2014 7/14/2014	Work in progress-FA Work completed Work in progress-FA
975-16 CAL 1-18(4), Alice Griffith	Sidewalk/walkways/concrete repairs (Phase I) 504 - Modification Sewer Heating Line Vacant Units Boiler Emergency Services-SFPUC	7/14/2012		12/31/2010 12/31/2010 12/31/2010 3/31/2011	7/14/2014 7/14/2014 7/14/2014 7/14/2014	Re-programmed Work in progress-FA Work in progress-FA Work in progress Work in progress Work completed Work in progress
976-18 CAL 1-18(6), Ping Yuen North	Re-roofing HOMELESS UNITS	7/14/2012		3/31/2011 12/31/2011	7/14/2014	Work in progress Work completed - FA
977-33 CAL 1-32, 1760 Bush	Water Lines 504	7/14/2012		3/31/2011 6/30/2011	7/14/2014	Work completed-FA Work in progress
978-17 CAL 1-18(5) Rosa Parks	Sewer replacement (Phase I) Mold and Mildew Remediation Pest Control Vacant Units	7/14/2012		12/31/2010 3/31/2011 6/30/2011	7/14/2014 7/14/2014 7/14/2014	Re-programmed Work in progress Work completed Work completed

FHA Name: **SAN FRANCISCO HOUSING AUTHORITY**
 U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Grant Type and Number
 Capital Fund Program No: CA39P00160110

OMB Approval No. 2577-0157
 (exp. 11/30/2008)
 Federal FY of Grant:
 2010 CFP

Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates
	Original	Revised	Original	Revised	
979-22 CAL 1-18(10), Woodside Gardens	7/14/2012		7/14/2014		Reprogrammed Work in progress Work in progress
980-21 CAL 1-18 (13), Mission Dolores	7/14/2012		7/14/2014		Work in progress Work in progress Work in progress-FA Work in progress-FA Work completed
981-25 CAL 1-27, 350 Ellis	7/14/2012		7/14/2014		Work in progress Reprogrammed Reprogrammed Work completed
985-28 CAL 1-30, 462 Duboce	7/14/2012		7/14/2014		Work completed Work completed Work in progress Work in progress
980-37 CAL 1-34, 353 Noe	7/14/2012		7/14/2014		Work in progress
981-32 CAL 1-28, 666 Ellis	7/14/2012		7/14/2014		Work in progress
982-27 CAL 1-20, 3650 18th	7/14/2012		7/14/2014		Work in progress-FA Work in progress Work in progress
983-31 CAL 1-21, Clementina					Work completed Work completed
984-39 CAL 1-35, 2698 California	7/14/2012		7/14/2014		Re-programmed Re-programmed
984-20 CAL 1-18(1), JFK	7/14/2012		7/14/2014		Re-programmed Work completed
985-43 CAL 1-19(2), 1750 McAllister	7/14/2012		7/14/2014		Work in progress

Annual Statement/Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFPICFPRHF) Part III: Implementation Schedule		U.S. Department of Housing and Urban Development Office of Public and Indian Housing		OMB Approval No. 2577-0757 (exp. 11/30/2008)			
PHA Name: SAN FRANCISCO HOUSING AUTHORITY		Grant Type and Number Capital Fund Program No: CA39P00150110		Federal FY of Grant: 2010 CFP			
Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates		
	Original	Revised	Original	Revised/Actual			
986-40 CAL 1-31, 25 Sanchez	504 - Modification	7/14/2012	12/31/2010	7/14/2014	3/31/2011	Work in progress-FA	
986-41 CAL 1-29, 345 Arguello	Upgrade Community Room lighting 504 - Modification Fire unit	7/14/2012 7/14/2012	12/31/2010	7/14/2014 7/14/2014		Re-programmed Work in progress-FA Work in progress-FA	
986-42 CAL 1-37, 491 31st Ave	504 - Modification		6/30/2011			Work in progress-FA	
988-51 CAL 1-43, Robert Pitts	504 - Modification Sidewalk Repair	7/14/2012	12/31/2010 6/30/2011	7/14/2014		Work in progress-FA Work in progress	
PHA-Wide:	HA-Wide Lead Abatement	7/14/2012	3/31/2011	7/14/2014	12/31/2011	Work in progress Work completed	
	HA-Wide Asbestos Abatement	7/14/2012		7/14/2014		Work in progress	
	Mold and Mildew Remediation	7/14/2012		7/14/2014		Re-programmed	
	Blood-born pathogens decontamination	7/14/2012		7/14/2014		Re-programmed	
	HA-Wide 504/ADA reasonable accommodations (FA)	7/14/2012		7/14/2014		Re-programmed	
	HA-Wide vacant units rehabilitation (FA)	7/14/2012		7/14/2014		Re-programmed	
	HA-Wide fire unit repair (FA)	7/14/2012		7/14/2014		Re-programmed	
	HA-Wide New appliances	7/14/2012		7/14/2014		Re-programmed	
	HA-Wide Sidewalk repair/replacement and fences (FA)	7/14/2012		7/14/2014		Re-programmed	
	HA-Wide Community facilities and Playground repairs/replacement.	7/14/2012		7/14/2014		Re-programmed	
	Hardwire smoke detectors	7/14/2012		7/14/2014		Re-programmed	
	Elevator upgrades	7/14/2012		7/14/2014		Re-programmed	
	Surveillance cameras	7/14/2012		7/14/2014		Re-programmed	
	Modernization of Property Offices PHA Wide (FA)	7/14/2012		9/30/2010	7/14/2014	9/30/2010	Work completed
	Landscaping	7/14/2012		7/14/2014		7/14/2014	Re-programmed
Unit Lock Upgrades at Senior Buildings	7/14/2012		7/14/2014		7/14/2014	Re-programmed	
Electrical Improvements	7/14/2012		12/31/2011	7/14/2014		Work in progress	
Plumbing Improvements	7/14/2012			7/14/2014		Re-programmed	
HVAC/Rooftop ventilation and heat pump improvements	7/14/2012			7/14/2014		Re-programmed	
HA Wide interior: common space improvements, including furnishings, fixtures and equipment (FA)	7/14/2012			7/14/2014		Re-programmed	
Gutter/Downspout replacement	7/14/2012		12/31/2011	7/14/2014		Work in progress	
Relocation	7/14/2012			7/14/2014		Re-programmed	
Replacement Housing and Revitalization						Re-programmed	

¹To be completed for the Performance and Evaluation Report or a revised Annual Statement.
²To be completed for the Performance and Evaluation Report.

Annual Statement/Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part III: Implementation Schedule		U.S. Department of Housing and Urban Development Office of Public and Indian Housing		OMB Approval No. 2577-0157 (exp. 11/30/2008)	
PHA Name: SAN FRANCISCO HOUSING AUTHORITY		Grant Type and Number Capital Fund Program No: CA39P00150110		Federal FY of Grant: 2010 CFP	
Development Number Name/HA-wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates
	Original	Revised	Original	Revised	
NON-DWELLING EQUIPMENT	7/14/2012	9/30/2010	7/14/2014	9/30/2010	Work in progress Re-programmed Work in progress
MANAGEMENT IMPROVEMENTS (@ 20% OF TOTAL GRANT)	7/14/2012	9/30/2010	7/14/2014	9/30/2010	Work in progress Work in progress Work in progress
ADMINISTRATION	7/14/2012	12/31/2010	7/14/2014	12/31/2010	Work completed
FEEES AND COSTS	7/14/2012	12/31/2010	7/14/2014	12/31/2011	Work in progress Work in progress Work completed
OPERATING SUBSIDY (@ 20% OF TOTAL GRANT)	7/14/2012	12/31/2010	7/14/2014	12/31/2010	Work completed



2012 CAPITAL FUND PROGRAM
ANNUAL SUBMISSION

P&ER FOR 2011 CFP AS OF 3/31/12

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 3/31/2014

Part I: Summary

PHA Name: **SAN FRANCISCO HOUSING AUTHORITY**

Grant Type and Number: **Capital Fund Program Grant No: CA39P00150111**

Replacement Housing Factor Grant No: **FFY of Grant Approval: 2011**

Date of CPPP: **FFY of Grant Approval: 2011**

Line	Type of Grant	Original	Total Estimated Cost		Total Actual Cost ¹	
			Original	Revised ²	Obligated	Expended
1	Total non-CPP Funds	\$ -	\$ -	\$ -	\$ -	\$ -
2	1406 Operations (may not exceed 20% of line 21) ³	\$ 2,235,207	\$ 2,235,207	\$ 2,235,207	\$ 2,235,207	\$ 2,235,207
3	1408 Management Improvements	\$ 1,930,960	\$ 2,235,207	\$ 2,235,207	\$ 2,235,207	\$ 916,448
4	1410 Administration (may not exceed 10% of line 21)	\$ 1,117,604	\$ 1,117,604	\$ 1,117,604	\$ 1,117,604	\$ 1,117,604
5	1411 Audit	\$ -	\$ -	\$ -	\$ -	\$ -
6	1415 Liquidated Damages	\$ -	\$ -	\$ -	\$ -	\$ -
7	1430 Fees and Costs	\$ 1,300,000	\$ 1,300,000	\$ 1,300,000	\$ 1,026,400	\$ 146,394
8	1440 Site Acquisition	\$ -	\$ -	\$ -	\$ -	\$ -
9	1450 Site Improvement	\$ 1,600,000	\$ 238,992	\$ 238,992	\$ 203,013	\$ 4,132
10	1460 Dwelling Structures	\$ 1,787,264	\$ 3,789,025	\$ 3,789,025	\$ 3,430,239	\$ 1,485,579
11	1465.1 Dwelling Equipment—Nonexpendable	\$ 10,000	\$ -	\$ -	\$ -	\$ -
12	1470 Non-dwelling Structures	\$ -	\$ -	\$ -	\$ -	\$ -
13	1475 Non-dwelling Equipment	\$ 180,000	\$ 180,000	\$ 180,000	\$ 12,000	\$ -
14	1485 Demolition	\$ -	\$ -	\$ -	\$ -	\$ -
15	1492 Moving to Work Demonstration	\$ -	\$ -	\$ -	\$ -	\$ -
16	1495.1 Relocation Costs	\$ 10,000	\$ 60,000	\$ 60,000	\$ 60,000	\$ -
17	1499 Development Activities ⁴	\$ 5,000	\$ -	\$ -	\$ -	\$ -
18a	1501 Collateralization or Debt Service paid by the PHA	\$ 500,000	\$ (0)	\$ -	\$ -	\$ -
18ba	9000 Collateralization of Debt Service paid Via System of Direct Payment	\$ 500,000	\$ -	\$ -	\$ -	\$ -
19	1502 Contingency (may not exceed 8% of line 20)	\$ -	\$ -	\$ -	\$ -	\$ -
20	Amount of Annual Grant: (sum of lines 2-19)	\$ 11,176,035	\$ 11,176,035	\$ 10,319,670	\$ 5,905,363	\$ 13,728
21	Amount of line 20 Related to LEP Activities	\$ 135,000	\$ 13,728	\$ 13,728	\$ 6,167	\$ 17,358
22	Amount of line 20 Related to Section 504 Activities	\$ 445,000	\$ 23,526	\$ 23,526	\$ 2,110,207	\$ -
23	Amount of line 20 Related to Security - Soft Costs	\$ 1,805,960	\$ 2,110,207	\$ 2,110,207	\$ -	\$ 70,000
24	Amount of line 20 Related to Security - Hard Costs	\$ 235,000	\$ 70,000	\$ 70,000	\$ -	\$ -
25	Amount of line 20 Related to Energy Conservation Measures	\$ 985,000	\$ 75,140	\$ 18,227	\$ 18,227	\$ 56,913

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

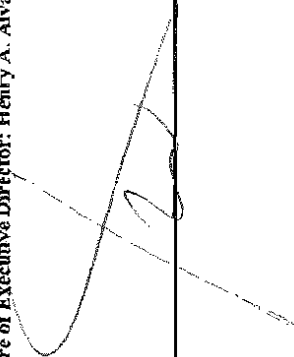
³ PHAs with under 250 units in management may use 10% of CPP Grants for operations.

⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 3/31/2014

Part I: Summary	
PHA Name: SAN FRANCISCO HOUSING AUTHORITY	Grant Type and Number Capital Fund Program Grant No: CA39P00150111 Replacement Housing Factor Grant No: Date of CFFP:
Type of Grant <input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 3/31/12 Signature of Executive Director: Henry A. Alvarez III Date:	<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Final Performance and Evaluation Report Signature of Public Housing Director Date:



Part II: Supporting Pages		Grant Type and Number		Federal FY of Grant: 2011						
PHA Name: SAN FRANCISCO HOUSING AUTHORITY		Capital Fund Program Grant No: CA39P00150111		Replacement Housing Factor Grant No:						
Development Number Name/PHA-Wide Activities		General Description of Major Work Categories		Development Account No.						
		Quantity		Total Estimated Cost						
		Original		Revised ¹						
		Funds Obligated ²		Expended						
		Status of Work								
AMP #956, CAL 1-1, Holly Courts	Install New Security Gates and Intercom Systems	1450	100%	\$ 10,000	\$ -	-	-	-	-	-
AMP #956, CAL 1-1, Holly Courts	Brk Proofing-11-620-QTE-009	1460		\$ 80,000	\$ 80,000	\$ -	\$ -	\$ -	\$ -	Work in progress
AMP #956, CAL 1-1, Holly Courts	Vacant Units	1460		\$ 46,385	\$ 46,385	\$ 3,996	\$ 3,996	\$ -	\$ -	Work in progress
ALEMANY	Vacant Units	1460		\$ 1,973	\$ 1,973	\$ -	\$ -	\$ 1,973	\$ 1,973	Work Completed
AMP #967, CAL 1-2, Potrero Terrace	Recycling Center	1450	100%	\$ 140,000	\$ 2,152	\$ -	\$ 2,152	\$ -	\$ 2,152	Work Completed
CAL 1-2, POTRERO TERRACE	Vacant Units	1460		\$ 661,216	\$ 660,980	\$ -	\$ 289,547	\$ -	\$ 289,547	Work in progress
CAL 1-2, POTRERO TERRACE	504 Modification	1460		\$ -	\$ 8,094	\$ -	\$ 7,425	\$ -	\$ 7,425	Work in progress
AMP #968, CAL 1-3, Sunnydale	Sidewalk/ walkways/ concrete repairs/ Handrail repairs	1450	100%	\$ 10,000	\$ 8,490	\$ -	\$ -	\$ -	\$ -	Work in progress
AMP #968, CAL 1-3, Sunnydale	Water Main and Isolation Valve Connection to Building Replace	1450	100%	\$ 50,000	\$ -	\$ -	\$ -	\$ -	\$ -	-
AMP #968, CAL 1-3, Sunnydale	Paint Unit-Interior	1460	100%	\$ 10,000	\$ 6,376	\$ -	\$ -	\$ -	\$ -	-
AMP #968, CAL 1-3, Sunnydale	Upgrade Exterior lighting	1450	100%	\$ 50,000	\$ -	\$ -	\$ -	\$ -	\$ -	-
AMP #968, CAL 1-3, Sunnydale	VACANT UNITS REPAIR	1460		\$ 1,184,077	\$ 1,153,525	\$ -	\$ 763,753	\$ -	\$ 763,753	Work in progress
AMP #968, CAL 1-3, Sunnydale	Vacant Units	1460		\$ 2,745	\$ 2,745	\$ -	\$ -	\$ -	\$ -	Work in progress
AMP #968, CAL 1-3, Sunnydale	504 Modification	1460		\$ 3,094	\$ 3,094	\$ -	\$ 312	\$ -	\$ 312	Work in progress
AMP #968, CAL 18(7), Velasco	Sidewalk/ walkways/ concrete repairs/ Handrail repairs	1450	100%	\$ 10,000	\$ -	\$ -	\$ -	\$ -	\$ -	-
AMP #968, CAL 18(7), Velasco	Exterior painting/weatherization	1460	100%	\$ 25,500	\$ 7,352	\$ -	\$ -	\$ -	\$ -	-
AMP #968, CAL 18(7), Velasco	Vacant Units	1460		\$ 20,373	\$ 20,373	\$ -	\$ 3,743	\$ -	\$ 3,743	Work in progress
AMP #969, CAL 1-8, Westside Courts	Water main and sewer improvements (Phase I)	1450	100%	\$ 600,000	\$ -	\$ -	\$ -	\$ -	\$ -	-
AMP #969, CAL 1-8, Westside Courts	Vacant Unit	1460		\$ 47,062	\$ 47,062	\$ -	\$ 13,525	\$ -	\$ 13,525	Work in progress
AMP #970, CAL 1-9, Westbrook	Replace sewer lines (Phase I); (FA)	1450	100%	\$ 80,000	\$ -	\$ -	\$ -	\$ -	\$ -	-
AMP #970, CAL 1-9, Westbrook	Replace back porch dry rotted balconies (FA)	1460	100%	\$ 100,000	\$ -	\$ -	\$ -	\$ -	\$ -	-
AMP #970, CAL 1-9, Westbrook	Handrail and fence replacement	1450	100%	\$ 70,000	\$ -	\$ -	\$ -	\$ -	\$ -	-
AMP #970, CAL 1-9, Westbrook	Vacant Units	1460		\$ 128,311	\$ 125,411	\$ -	\$ -	\$ -	\$ -	Work in progress
AMP #970, CAL 1-9, Westbrook	504 Modification	1460		\$ 2,534	\$ 2,534	\$ -	\$ 309	\$ -	\$ 309	Work in progress
AMP #971, CAL 1-10, Potrero Annex	Handrail and fence replacement/parking area improvements	1450	100%	\$ 60,000	\$ 5,035	\$ -	\$ -	\$ -	\$ -	Work in progress
AMP #971, CAL 1-10, Potrero Annex	Gate	1450		\$ 14,903	\$ 14,903	\$ -	\$ -	\$ -	\$ -	Work in progress
AMP #971, CAL 1-10, Potrero Annex	Sewer rehabilitation (FA)	1460	100%	\$ 50,000	\$ 47,788	\$ -	\$ 18,527	\$ -	\$ 18,527	Work in progress
AMP #971, CAL 1-10, Potrero Annex	Vacant units	1460		\$ 258,823	\$ 256,943	\$ -	\$ 77,194	\$ -	\$ 77,194	Work in progress
AMP #971, CAL 1-10, Potrero Annex	Pest Control	1460		\$ 1,980	\$ 1,980	\$ -	\$ 1,980	\$ -	\$ 1,980	Work Completed
AMP #971, CAL 1-10, Potrero Annex	504 Modification	1460		\$ 2,385	\$ 2,385	\$ -	\$ 280	\$ -	\$ 280	Work in progress
AMP #972, CAL 1-15, Ping Yuen	Trash Room Modernization	1460	100%	\$ 250,000	\$ -	\$ -	\$ -	\$ -	\$ -	-
AMP #972, CAL 1-15, Ping Yuen	Fire Alarm Panel Replacement-11-620-QTE-01150	1460		\$ 20,000	\$ 20,000	\$ -	\$ -	\$ -	\$ -	Work in progress
AMP #972, CAL 1-15, Ping Yuen	504 Modification	1460		\$ 3,094	\$ 3,094	\$ -	\$ 216	\$ -	\$ 216	Work in progress

Part II: Supporting Pages		Grant Type and Number		Federal FFY of Grant: 2011				
PHA Name: SAN FRANCISCO HOUSING AUTHORITY		Capital Fund Program Grant No: CA39P00150111						
		Replacement Housing Factor Grant No:						
		CFEP (Yes/No): NO						
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Expended	
AMP #973, CAL 1-17A, Hunters Point	Sidewalk/ walkways/ concrete repairs (Phase I)	1450	100%	\$ 100,000	\$ -	\$ -	\$ -	-
AMP #973, CAL 1-17A, Hunters Point	Sewer rehabilitation (FA)	1450	100%	\$ 100,000	\$ -	\$ -	\$ -	-
AMP #973, CAL 1-17A, Hunters Point	Vacant Units	1460		\$ 107,837	\$ 70,714	\$ 70,714	\$ 70,714	Work Completed
AMP #973, CAL 1-17A, Hunters Point	Vacant Units	1460		\$ 242,729	\$ 134,387	\$ 60,627	\$ 60,627	Work in progress
Hunters View	VACANT UNITS REPAIRS	1460		\$ 620	\$ -	\$ -	\$ -	-
Hunters View	504 Modification	1460		\$ 3,106	\$ 3,106	\$ 331	\$ 331	Work in progress
AMP #975, CAL 1-18(4), Alice Griffith	Recycling Center	1450	100%	\$ 140,000	\$ 9,059	\$ -	\$ -	-
AMP #975, CAL 1-18(4), Alice Griffith	Vacant Units (homeless)	1460		\$ 166,113	\$ 166,113	\$ 51,254	\$ 51,254	Work in progress
AMP #975, CAL 1-18(4), Alice Griffith	Repair Fire damaged	1460		\$ 75,143	\$ 75,143	\$ -	\$ -	Work in progress
AMP #975, CAL 1-18(4), Alice Griffith	Plumbing Improvements	1460		\$ 8,000	\$ 8,000	\$ -	\$ -	Work in progress
AMP #975, CAL 1-18(4), Alice Griffith	Sewer	1450		\$ 12,684	\$ 12,684	\$ -	\$ -	Work in progress
AMP #975, CAL 1-18(4), Alice Griffith	504 Modification	1460		\$ 23,225	\$ 23,225	\$ -	\$ -	Work in progress
CAL 1-18(5) ROSA PARK APT	Sewer Lines-11-620-IFB-1147 \$224,804.0	1450		\$ -	\$ -	\$ -	\$ -	Reprogrammed
CAL 1-18(5) ROSA PARK APT	Fire Damaged Apts	1460		\$ 6,502	\$ 6,502	\$ -	\$ -	Work in progress
CAL 1-18(5) ROSA PARK APT	Vacant Units	1460		\$ 61,747	\$ 61,747	\$ 39,757	\$ 39,757	Work in progress
Sar-Jales	Dry Rot repair	1460		\$ 2,659	\$ 2,659	\$ -	\$ -	Work in progress
AMP #979, CAL 118(10), Woodside Gardens	Rail Installations	1450	100%	\$ 1,900	\$ 1,900	\$ -	\$ -	Work in progress
AMP #979, CAL 118(10), Woodside Gardens	Concrete repairs and exterior waterproofing	1460		\$ 352,000	\$ -	\$ -	\$ -	Work in progress
AMP #979, CAL 118(10), Woodside Gardens	Bathroom Repair- FA/11/11-049	1460		\$ 6,195	\$ 6,195	\$ 113	\$ 113	Work in progress
AMP #979, CAL 118(10), Woodside Gardens	Generator	1460		\$ 15,167	\$ 11,956	\$ 11,956	\$ 11,956	Work Completed
AMP #979, CAL 118(10), Woodside Gardens	504 Modification	1460		\$ 344	\$ 344	\$ 344	\$ 344	Work Completed
AMP #980, CAL 1-18(13), Mission Dolores	Trash Room Modernization	1460	100%	\$ 65,000	\$ 15,347	\$ -	\$ -	-
AMP #980, CAL 1-18(13), Mission Dolores	0%	1460		\$ 2,599	\$ 2,599	\$ 2,599	\$ 2,599	Work in progress
AMP #980, CAL 1-18(13), Mission Dolores	Standby Generator Rental	1460		\$ -	\$ -	\$ -	\$ -	-
350 ELLIS	Fire Alarm Panel Replacement-11-620-QTE-01150	1460		\$ 20,000	\$ 20,000	\$ -	\$ -	Work in progress
666 ELLIS	504 Modification	1460		\$ 5,044	\$ 5,044	\$ -	\$ -	Work in progress
666 ELLIS	Fire Alarm Panel Replacement-11-620-QTE-01150	1460		\$ 20,000	\$ 20,000	\$ -	\$ -	Work in progress
AMP #982, CAL 1-20, 3850 18th St.	504 Modification	1460		\$ 9,729	\$ 9,729	\$ -	\$ -	Work in progress
AMP #982, CAL 1-20, 3850 18th St.	Trash Room Modernization	1460	100%	\$ 25,000	\$ -	\$ -	\$ -	-
AMP #982, CAL 1-20, 3850 18th St.	Elevator	1460		\$ 3,651	\$ 3,651	\$ -	\$ -	Work in progress
939 EDDY	P 18 Vacant units Homeless Projects	1460		\$ 8,089	\$ 8,089	\$ 4,735	\$ 4,735	Work in progress

Part II: Supporting Pages		Federal FY of Grant: 2011						
PHA Name: SAN FRANCISCO HOUSING AUTHORITY		Grant Type and Number Capital Fund Program Grant No: CA39P00150111 Replacement Housing Factor Grant No: CFRP (Yes/No): NO						
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Expended	
990 PACIFIC	Vacant Units(Homeless)	1460		\$ 25,264	\$ 25,264	\$ 24,574		Work in progress
PING YUEN NORTH	Vacant Units(Homeless)	1460		\$ 16,000	\$ 13,884	\$ -		Work in progress
PING YUEN NORTH	New Vent System and Stovehood	1460		\$ 23,850	\$ 23,850	\$ -		Work in progress
PING YUEN NORTH	504 Modification	1460		\$ 3,350	\$ 3,350	\$ 1,728		Work in progress
363 NOE	Repair Fire Damage	1460		\$ 47,919	\$ 47,919	\$ 23,575		Work in progress
363 NOE	Hard wired smoke Detector	1460		\$ 532	\$ 532	\$ 132		
ROBERT B.PITTS	FENCE & GATE	1450		\$ 1,980	\$ 1,980	\$ 1,980		Work in progress
ROBERT B.PITTS	504 Modification	1460		\$ 5,364	\$ 5,364	\$ 548		Work in progress
ROBERT B.PITTS	Vacant Units	1460		\$ 90,256	\$ 90,256	\$ 33,516		Work in progress
	TOTAL DEVELOPMENTS			\$ 240,000	\$ 3,616,246	\$ 3,342,850	\$ 1,489,710	
PHA WIDE	HA-Wide Lead Abatement	1460	100%	\$ 75,000	\$ 75,000	\$ 25,000		Work in progress
	HA-Wide Asbestos Abatement	1450	100%	\$ 75,000	\$ 75,000	\$ 25,000		Work in progress
	Mold and Mildew Remediation	1460	100%	\$ 5,000	\$ -	\$ -		
	Blood-born pathogens decontamination	1460	100%	\$ 5,000	\$ -	\$ -		
	HA-Wide 504/ADA reasonable accommodations (FA)	1460	100%	\$ 75,000	\$ -	\$ -		
	HA-Wide vacant units rehabilitation (FA)	1450	100%	\$ 500,000	\$ -	\$ -		
	HA-Wide fire unit repair (FA)	1460	100%	\$ 125,264	\$ -	\$ -		
	HA-Wide New appliances	1465.1	100%	\$ 10,000	\$ -	\$ -		
	HA-Wide Sidewalk repair/replacement and fences (FA)	1450	100%	\$ 10,000	\$ -	\$ -		
	HA-Wide Community facilities and Playground	1450	100%	\$ 5,000	\$ -	\$ -		
	HA-Wide Trees	1450	100%	\$ 120,000	\$ -	\$ 120,000		Work in progress
	Hardwire smoke/ carbon monoxide detectors	1460	100%	\$ 5,000	\$ 96,771	\$ 97,402		Work in progress
	Elevator upgrades	1460	100%	\$ 50,000	\$ -	\$ -		
	Surveillance cameras	1475	100%	\$ 50,000	\$ 50,000	\$ -		
	Modernization of Property Offices PHA Wide (FA)	1470	100%	\$ -	\$ -	\$ -		
	Landscaping	1450	100%	\$ 5,000	\$ -	\$ -		
	Unit Lock Upgrades at Senior Buildings	1460	100%	\$ 5,001	\$ -	\$ -		
	Electrical Improvements	1460	100%	\$ 10,000	\$ 10,000	\$ -		
	Plumbing Improvements	1460	100%	\$ 10,000	\$ 10,000	\$ -		
	HVAC/Rooftop ventilation and heat pump improvements	1460	100%	\$ 10,000	\$ 10,000	\$ -		
	HA Wide interior common space improvements (FA)	1460	100%	\$ -	\$ -	\$ -		
	Gutter/Downspout replacement	1460	100%	\$ 10,000	\$ 10,000	\$ -		
	Relocation	1495	100%	\$ 10,000	\$ 60,003	\$ 60,000		Work in progress
	Replacement Housing and Revitalization	1499	100%	\$ 5,000	\$ -	\$ -		
	Exterior Lighting to support the solicitation 12-620-QTE-005	1450	100%	\$ -	\$ 25,000	\$ 25,000		Work in progress
	TOTAL PHA WIDE:			\$ 1,055,264	\$ 5,411,771	\$ 350,492	\$ -	

Part II: Supporting Pages		Grant Type and Number		Federal FY of Grant: 2011					
PHA Name: SAN FRANCISCO HOUSING AUTHORITY		Capital Fund Program Grant No: CA39900150111		Replacement Housing Factor Grant No:					
Development Number Name/PHA-Wide Activities		General Description of Major Work Categories		Development Account No.					
				Quantity					
				Total Estimated Cost					
				Total Actual Cost					
				Status of Work					
				Funds Obligated ²					
				Expended					
				Original					
				Revised ¹					
NON-DWELLING EQUIPMENT	Document Imaging (Hardware)	1475	100%	\$ 50,000	\$ 50,000	\$ -	\$ -	-	-
	Server Data Storage	1475	100%	\$ 35,000	\$ 35,000	\$ 12,000	\$ -	-	Work in progress
	Server Backup Environment	1475	100%	\$ 45,000	\$ 45,000	\$ -	\$ -	-	-
	TOTAL NON-DWELLING EQUIPMENT			\$ 130,000	\$ 130,000	\$ 12,000	\$ -	\$ -	-
ADMINISTRATION (10% GRANT)	TOTAL ADMINISTRATION	1410	100%	\$ 1,117,604	\$ 1,117,604	\$ 1,117,604	\$ 1,117,604	\$ 1,117,604	-
MANAGEMENT IMPROVEMENT	Improve Security	1408	100%	\$ 1,805,960	\$ 2,110,207	\$ 2,110,207	\$ 2,110,207	\$ 2,110,207	Work in progress
20% GRANT	Software and Implementation (Document Imaging)	1408	100%	\$ 125,000	\$ 125,000	\$ 125,000	\$ 125,000	\$ 125,000	Work in progress
	TOTAL MANAGEMENT IMPROVEMENT			\$ 1,930,960	\$ 2,235,207	\$ 2,235,207	\$ 2,235,207	\$ 2,235,207	-
OPERATING SUBSIDY (20% GRANT)	TOTAL OPERATING SUBSIDY	1406	100%	\$ 2,235,207	\$ 2,235,207	\$ 2,235,207	\$ 2,235,207	\$ 2,235,207	-
FEES AND COSTS	A/E (Includes PMs & Inspector's Salaries)	1430	100%	\$ 1,300,000	\$ 1,300,000	\$ 1,026,400	\$ 1,026,400	\$ 1,026,400	-
	A/E (Includes PMs & Inspector's Salaries)	1430			\$ 300,000				-
	Consultants	1430			\$ 1,000,000				-
	Architectural Services-TBD-11-620RFQ-1153	1430							-
	F W Associates-Contract #90032; Amendment #2	1430							-
	ABC Imaging -Contract #1369 ; Amendment #2	1430							-
CAPITAL FUND FINANCING PROGRAM	Collateralization or Debt Service paid by the PHA	1501	As Req.	\$ 500,000	\$ (0)	\$ -	\$ -	\$ -	-
CAPITAL FUND FINANCING PROGRAM	Collateralization or Debt Service paid Via System of Direct	9000	As Req.	\$ 500,000	\$ -	\$ -	\$ -	\$ -	-
	TOTAL GRANT			\$ 11,176,035	\$ 11,176,035	\$ 10,319,670	\$ 10,319,670	\$ 5,905,363	-

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

Part III: Implementation Schedule for Capital Fund Financing Program

PHA Name	Development Number Name PHA-Wide Activity	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Keyed Target Dates
		Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
PHA WIDE	HA-Wide Lead Abatement	9/31/13	3/31/2012	9/30/2015		Work in Progress
	HA-Wide Asbestos Abatement	9/31/13	3/31/2012	9/30/2015		Work in Progress
	Mold and Mildew Remediation	9/31/13		9/30/2015		Work in Progress
	Blind-bore pathogens decontamination	9/31/13		9/30/2015		Work in Progress
	HA-Wide 304/ADA reasonable accommodations (FA)	9/31/13		9/30/2015		Work in Progress
	HA-Wide vacant units rehabilitation (FA)	9/31/13		9/30/2015		Work in Progress
	HA-Wide fire unit repair (FA)	9/31/13		9/30/2015		Work in Progress
	HA-Wide New appliances	9/31/13		9/30/2015		Work in Progress
	HA-Wide Sidewalk repair/replacement and fences (FA)	9/31/13		9/30/2015		Work in Progress
	HA-Wide Community facilities and Playground repairs/replacement	9/31/13		9/30/2015		Work in Progress
	HA-Wide Trees	9/31/13	2/21/2012	9/30/2015		Work in Progress
	Handwire smoke/ carbon monoxide detectors	9/31/13	3/31/2012	9/30/2015		Work in Progress
	Elevator upgrades	9/31/13		9/30/2015		Work in Progress
	Surveillance cameras	9/31/13		9/30/2015		Work in Progress
	Modernization of Property Offices PHA Wide (FA)	9/31/13		9/30/2015		Work in Progress
	Landscaping	9/31/13		9/30/2015		Work in Progress
	Unit Lock Upgrades at Senior Buildings	9/31/13		9/30/2015		Work in Progress
	Electrical Improvements	9/31/13		9/30/2015		Work in Progress
	Plumbing Improvements	9/31/13		9/30/2015		Work in Progress
	HVAC, Rooftop ventilation and heat pump improvements	9/31/13		9/30/2015		Work in Progress
HA-Wide Interior common space improvements (FA)	9/31/13		9/30/2015		Work in Progress	
Gutter/Downspout replacement	9/31/13		9/30/2015		Work in Progress	
Relocation	9/31/13	4/30/2012	9/30/2015		Work in Progress	
Replacement Housing and Revitalization	9/31/13		9/30/2015		Work in Progress	
Exterior Lighting to support the solicitation 12-620-QTE-005	9/31/13	3/12/2012	9/30/2015		Work in Progress	
Document Imaging (Hardware)	9/31/13		9/30/2015		Work in Progress	
Server Data Storage	9/31/13		9/30/2015		Work in Progress	
Server Backup Environment	9/31/13		9/30/2015		Work in Progress	
Administration	9/31/13	3/31/2012	9/30/2015		Work in Progress	
Improve Security	9/31/13	3/31/2012	9/30/2015		Work in Progress	
Software and Implementation (Document Imaging)	9/31/13	3/31/2012	9/30/2015		Work in Progress	
Operating Subsidy	9/31/13	3/31/2012	9/30/2015		Work in Progress	
AFE (Includes PAs & Inspector's Salaries)	9/31/13	3/31/2012	9/30/2015		Work in Progress	
Collateralization or Debt Service paid by the PHA	9/31/13	3/31/2012	9/30/2015		Work in Progress	
Collateralization or Debt Service paid Via System of Direct Payment	9/31/13	3/31/2012	9/30/2015		Re-program	
					Re-program	

Part III: Implementation Schedule for Capital Fund Financing Program

PHA Name	Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Traged Dates
		Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
AMP #966, CAL 1-1, Holly Courts	Install New Security Gates and Intercom Systems	9/31/13	9/30/2015	9/30/2015	9/30/2015	Work in Progress
AMP #966, CAL 1-1, Holly Courts	Bird Proofing-11-620-QTE-009	9/31/13	11/16/2011	9/30/2015	9/30/2015	Work in progress
AMP #966, CAL 1-1, Holly Courts	Vacant Units	9/31/13	3/1/2012	9/30/2015	9/30/2015	Work in progress
ALEMANY	Vacant Units	9/31/13	4/3/2012	9/30/2015	9/30/2015	Work Completed
AMP #967, CAL 1-2, Potrero Terrace	Recycling Center	9/31/13	1/31/2012	9/30/2015	9/30/2015	Work Completed
CAL 1-2, POTRERO TERRACE	Vacant Units	9/31/13	2/21/2012	9/30/2015	9/30/2015	Work in progress
CAL 1-2, POTRERO TERRACE	504 Modification	9/31/13	3/4/2012	9/30/2015	9/30/2015	Work in progress
AMP #968, CAL 1-3, Sunnydale	Sidewalk/ walkways/ concrete repairs/ Handrail repairs	9/31/13	3/26/2012	9/30/2015	9/30/2015	Work in progress
AMP #968, CAL 1-3, Sunnydale	Water Main and Isolation Valve Connection to Building Replacement	9/31/13	11/18/2011	9/30/2015	9/30/2015	Work in progress
AMP #968, CAL 1-3, Sunnydale	Point Unit Interior	9/31/13	11/18/2011	9/30/2015	9/30/2015	Work in Progress
AMP #968, CAL 1-3, Sunnydale	Upgrade Exterior lighting	9/31/13	1/18/2011	9/30/2015	9/30/2015	Work in Progress
AMP #968, CAL 1-3, Sunnydale	VACANT UNITS REPAIR	9/31/13	11/18/2011	9/30/2015	9/30/2015	Work in Progress
AMP #968, CAL 1-3, Sunnydale	Vacant Units	9/31/13	1/31/2012	9/30/2015	9/30/2015	Work in progress
AMP #968, CAL 1-3, Sunnydale	504 Modification	9/31/13	2/28/2012	9/30/2015	9/30/2015	Work in progress
AMP #968, CAL 18(7), Velasco	Sidewalk/ walkways/ concrete repairs/ Handrail repairs	9/31/13	3/20/2012	9/30/2015	9/30/2015	Work in Progress
AMP #968, CAL 18(7), Velasco	Exterior painting/ weatherization	9/31/13	9/30/2015	9/30/2015	9/30/2015	Work in Progress
AMP #968, CAL 18(7), Velasco	Vacant Units	9/31/13	2/29/2012	9/30/2015	9/30/2015	Work in progress
AMP #969, CAL 1-8, Westside Courts	Water main and sewer improvements (Phase 1)	9/31/13	9/30/2015	9/30/2015	9/30/2015	Work in Progress
AMP #969, CAL 1-8, Westside Courts	Vacant Unit	9/31/13	2/28/2012	9/30/2015	9/30/2015	Work in progress
AMP #970, CAL 1-9, Westbrook	Replace sewer lines (Phase 1); (FA)	9/31/13	9/30/2015	9/30/2015	9/30/2015	Reprogrammed
AMP #970, CAL 1-9, Westbrook	Replace back porch dry rotted balconies (FA)	9/31/13	9/30/2015	9/30/2015	9/30/2015	Reprogrammed
AMP #970, CAL 1-9, Westbrook	Handrail and fence replacement	9/31/13	9/30/2015	9/30/2015	9/30/2015	Reprogrammed
AMP #970, CAL 1-9, Westbrook	Vacant Units	9/31/13	3/15/2012	9/30/2015	9/30/2015	Work in progress
AMP #970, CAL 1-9, Westbrook	504 Modification	9/31/13	2/28/2012	9/30/2015	9/30/2015	Work in progress
AMP #971, CAL 1-10, Potrero Annex	Handrail and fence replacement/parking area improvements	9/31/13	3/1/2012	9/30/2015	9/30/2015	Work in progress
AMP #971, CAL 1-10, Potrero Annex	Gate	9/31/13	3/21/2012	9/30/2015	9/30/2015	Work in progress
AMP #971, CAL 1-10, Potrero Annex	Sewer rehabilitation (FA)	9/31/13	1/20/2012	9/30/2015	9/30/2015	Work in progress
AMP #971, CAL 1-10, Potrero Annex	Vacant units	9/31/13	2/14/2012	9/30/2015	9/30/2015	Work in progress
AMP #971, CAL 1-10, Potrero Annex	Pest Control	9/31/13	1/31/2012	9/30/2015	9/30/2015	Work Completed
AMP #971, CAL 1-10, Potrero Annex	504 Modification	9/31/13	2/28/2012	9/30/2015	9/30/2015	Work in progress
AMP #972, CAL 1-15, Ping Yuen	Trash Room Modernization	9/31/13	9/30/2015	9/30/2015	9/30/2015	Reprogrammed
AMP #972, CAL 1-15, Ping Yuen	Fire Alarm Panel Replacement-11-620-QTE-01150	9/31/13	11/18/2012	9/30/2015	9/30/2015	Work in progress
AMP #972, CAL 1-15, Ping Yuen	504 Modification	9/31/13	2/28/2012	9/30/2015	9/30/2015	Work in progress
AMP #973, CAL 1-17A, Hunters Point	Sidewalk/ walkways/ concrete repairs (Phase 1)	9/31/13	9/30/2015	9/30/2015	9/30/2015	Reprogrammed
AMP #973, CAL 1-17A, Hunters Point	Sewer rehabilitation (FA)	9/31/13	3/1/2012	9/30/2015	9/30/2015	Reprogrammed
AMP #973, CAL 1-17A, Hunters Point	Vacant Units	9/31/13	9/30/2015	9/30/2015	9/30/2015	Work Completed
AMP #973, CAL 1-17A, Hunters Point	Vacant Units	9/31/13	3/1/2012	9/30/2015	9/30/2015	Work in progress
Hunters View	VACANT UNITS REPAIRS	9/31/13	9/30/2015	9/30/2015	9/30/2015	Reprogrammed

Part III: Implementation Schedule for Capital Fund Financing Program

PIEA Name	Developmental Number Name/PIEA-Wide Activities	All Funds Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reason for Revised Target Date
		Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
Hazzard View	504 Modification	9/31/13	2/28/2013	9/30/2015	9/30/2015	Work in progress
AMP #975, CAL 1-18(4), Alice Griffith	Recycling Center	9/31/13		9/30/2015	9/30/2015	Work in Progress
AMP #975, CAL 1-18(4), Alice Griffith	Vacant Units (homeless)	9/31/13	3/1/2012	9/30/2015	9/30/2015	Work in progress
AMP #975, CAL 1-18(4), Alice Griffith	Repair Fire damaged	9/31/13	1/27/2012	9/30/2015	9/30/2015	Work in progress
AMP #975, CAL 1-18(4), Alice Griffith	Plumbing Improvements	9/31/13	3/1/2012	9/30/2015	9/30/2015	Work in progress
AMP #975, CAL 1-18(4), Alice Griffith	Sewer	9/31/13	3/1/2012	9/30/2015	9/30/2015	Work in progress
AMP #975, CAL 1-18(4), Alice Griffith	501 Modification	9/31/13	3/1/2012	9/30/2015	9/30/2015	Work in progress
CAL 1-18(5) ROSA PARK APT	Sewer Lines-1-620-IFB-1147 \$224,804.0	9/31/13	03/1/2012	9/30/2015	9/30/2015	Work in progress
CAL 1-18(5) ROSA PARK APT	Fire Damaged Apts	9/31/13	03/1/2012	9/30/2015	9/30/2015	Work in progress
CAL 1-18(5) ROSA PARK APT	Vacant Units	9/31/13	03/1/2012	9/30/2015	9/30/2015	Work in progress
San Joes	Dry Rot repair	9/31/13	03/1/2012	9/30/2015	9/30/2015	Work in progress
AMP #979, CAL 118(10), Woodside Gardens	Rail Installations	9/31/13	03/1/2012	9/30/2015	9/30/2015	Work in progress
AMP #979, CAL 118(10), Woodside Gardens	Concrete repairs and exterior waterproofing	9/31/13	1/1/2012	9/30/2015	9/30/2015	Work in progress
AMP #979, CAL 118(10), Woodside Gardens	Bedroom Repair - FA/1/1/1-049	9/31/13	11/30/2011	9/30/2015	9/30/2015	Work in progress
AMP #979, CAL 118(10), Woodside Gardens	Generator	9/31/13	1/18/2012	9/30/2015	9/30/2015	Work Completed
AMP #979, CAL 118(10), Woodside Gardens	504 Modification	9/31/13	1/31/2012	9/30/2015	9/30/2015	Work Completed
AMP #980, CAL 1-18(13), Mission Dolores	Trash Room Modernization	9/31/13		9/30/2015	9/30/2015	Reprogrammed
AMP #980, CAL 1-18(13), Mission Dolores	0%	9/31/13	2/28/2012	9/30/2015	9/30/2015	Work in progress
AMP #980, CAL 1-18(13), Mission Dolores	Standby Generator Rental	9/31/13	3/9/2012	9/30/2015	9/30/2015	Work in Progress
350 ELLIS	Fire Alarm Panel Replacement-11-620-QTE-01150	9/31/13	1/18/2012	9/30/2015	9/30/2015	Work in progress
350 ELLIS	504 Modification	9/31/13	3/21/2012	9/30/2015	9/30/2015	Work in progress
666 ELLIS	Fire Alarm Panel Replacement-11-620-QTE-01150	9/31/13	11/16/2011	9/30/2015	9/30/2015	Work in progress
666 ELLIS	504 Modification	9/31/13	3/27/2012	9/30/2015	9/30/2015	Work in progress
AMP #982, CAL 1-20, 3850 18th St.	Trash Room Modernization	9/31/13	2/8/2012	9/30/2015	9/30/2015	Reprogrammed
AMP #982, CAL 1-20, 3850 18th St.	Elevator	9/31/13	1/31/2012	9/30/2015	9/30/2015	Work in progress
939 EDDY	P 18 Vacant units Homeless Projects	9/31/13	2/28/2012	9/30/2015	9/30/2015	Work in progress
990 PACIFIC	Vacant Units(homeless)	9/31/13	2/28/2012	9/30/2015	9/30/2015	Work in progress
PING YIEN NORTH	Vacant Units(homeless)	9/31/13	2/28/2012	9/30/2015	9/30/2015	Work in progress
PING YIEN NORTH	New Vent System and Storeroom	9/31/13	1/31/2012	9/30/2015	9/30/2015	Work in progress
PING YIEN NORTH	504 Modification	9/31/13	3/7/2012	9/30/2015	9/30/2015	Work in progress
363 NCE	Repair Fire Damage	9/31/13	3/9/2012	9/30/2015	9/30/2015	Work in progress
363 Nce	Hard wired smoke Detector	9/31/13	1/31/2012	9/30/2015	9/30/2015	Work in Progress
ROBERT B FITTS	RENCE & GATE	9/31/13	03/1/2012	9/30/2015	9/30/2015	Work in Progress
ROBERT B FITTS	504 Modification	9/31/13	2/28/2012	9/30/2015	9/30/2015	Work in progress
ROBERT B FITTS	Vacant Units	9/31/13	2/14/2012	9/30/2015	9/30/2015	Work in progress

* Obligator and expenditure end date may only be revised with HUD approved pursuant to Section 91 of the U.S. Housing Act of 1957, as amended.



2012 CAPITAL FUND PROGRAM
ANNUAL SUBMISSION

P&ER FOR 2007 RHF AS OF 3/31/12

PHA Name: **SAN FRANCISCO HOUSING AUTHORITY**
 Grant Type and Number: **2007 CFP - RHF**
 Replacement Housing Factor Grant No: **CA39R00150107**

Line No.	Description	Total Estimated Cost			Total Actual Cost		
		Original	Revised	Obligated	Expended		
1	Total non-CFP Funds						
2	1406 Operations (May not exceed 20% of line 20)	\$ -	\$ -	\$ -	\$ -		
3	1408 Management Improvements (May not exceed 20% of line 20)	\$ -	\$ -	\$ -	\$ -		
4	1410 Administration (May not exceed 10% of line 20)	\$ 45,244	\$ 45,244	\$ 45,244	\$ 45,244		
5	1411 Audit	\$ -	\$ -	\$ -	\$ -		
6	1415 Liquidated Damages	\$ -	\$ -	\$ -	\$ -		
7	1430 Fees and Costs	\$ 45,244	\$ 45,244	\$ 45,244	\$ 45,244		
8	1440 Site Acquisition	\$ -	\$ -	\$ -	\$ -		
9	1450 Site Improvement	\$ 273,421	\$ 273,421	\$ 273,421	\$ 273,421		
10	1460 Dwelling Structures	\$ 88,533	\$ 88,533	\$ 88,533	\$ 88,533		
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	1499 Mod used for Development	\$ -	\$ -	\$ -	\$ -		
19	1502 Contingency (May not exceed 8% of line 20)	\$ -	\$ -	\$ -	\$ -		
20	Amount of Annual Grant (Sum of lines 2-19)	\$ 452,442	\$ 452,442	\$ 452,442	\$ 452,442		
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	-	-	-	-		

Signature of Executive Director: **Henry A. Alvarez, III, Executive Director**
 Date: **5/8/12**
 Signature of Public Housing Director: *[Signature]*
 Date: **X**

Annual Statement of Performance and Evaluation Report
 Capital Fund Program - CFP 2007 REPLACEMENT HOUSING FACTOR (CFP-RHF) - YEAR FIVE FIRST INCREMENT
 Part II: Supporting Pages

Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Funds Obligated	Funds Expended	Status of Work
				Original	Revised			
				Federal FY of Grant: CFP 2007 (RHF)				
974-15 CAL 1-18(3), Hunters View	Additional funding to build new Public Housing units.	1499	100%			\$ -	\$ -	
	ADMINISTRATION	1410	100%	\$ 45,244	\$ 45,244	\$ 45,244	\$ 45,244	Completed
	FEEs & COSTS	1430	100%	\$ 45,244	\$ 45,244	\$ 45,244	\$ 45,244	Completed
	SITE IMPROVEMENT	1450	100%	\$ 273,421	\$ 273,421	\$ 273,421	\$ 273,421	Completed
	DWELLING STRUCTURES	1460	100%	\$ 88,533	\$ 88,533	\$ 88,533	\$ 88,533	Completed

Annual Statement/Performance and Evaluation Report
Capital Fund Program - CFP 2007 REPLACEMENT HOUSING FACTOR (CFP-RHF) - YEAR FIVE FIRST INCREMENT
2007 CFP-RHF
Part III: Implementation Schedule

PHA Name: SAN FRANCISCO HOUSING AUTHORITY			Grant Type and Number				Federal FY of Grant
			All Fund Obligated (Quarter Ending Date)		Replacement Housing Factor NoCA39RD0150107 (Quarter Ending Date)		
Development Number Name/HA-Wide Activities	Original	Revised	Actual	Original	Revised	Actual	Reasons for Revised Target Dates
Additional funding to build new Public Housing units.							
ADMINISTRATION		1/9/2010	1/9/2010		1/9/2012		Completed
FEE'S & COSTS		1/9/2010	1/9/2010		1/9/2012		Completed
SITE IMPROVEMENT		1/9/2010	1/9/2010		1/9/2012		Completed
DWELLING STRUCTURES		1/9/2010	1/9/2010		1/9/2012		Completed




2012 CAPITAL FUND PROGRAM
ANNUAL SUBMISSION

P&ER FOR 2008 RHF AS OF 3/31/12

PHA Name: **SAN FRANCISCO HOUSING AUTHORITY**
 Federal FY of Grant: **2008 CFP - RHF**
 Replacement Housing Factor Grant No: CA39R00150108

Original Annual Statement: _____
 Revised Annual Statement/Revision Number: _____
 Performance and Evaluation Report for Program Year Ending: **3/31/11**
 Reserve for Disaster/Emergencies: _____
 Final Performance and Evaluation Report: _____

Line No.	Description	Total Estimated Cost			Total Actual Cost		
		Original	Revised	Obligated	Expended		
1	Total non-CFP Funds						
2	1405 Operations (May not exceed 20% of line 20)	\$ -	\$ -	\$ -	\$ -		
3	1408 Management Improvements (May not exceed 20% of line 20)	\$ -	\$ -	\$ -	\$ -		
4	1410 Administration (May not exceed 10% of line 20)	\$ -	\$ 46,118	\$ 46,118	\$ 46,118		
5	1411 Audit	\$ -	\$ -	\$ -	\$ -		
6	1415 Liquidated Damages	\$ -	\$ -	\$ -	\$ -		
7	1430 Fees and Costs	\$ -	\$ 46,118	\$ 46,118	\$ 46,118		
8	1440 Site Acquisition	\$ -	\$ -	\$ -	\$ -		
9	1450 Site Improvement	\$ -	\$ -	\$ -	\$ -		
10	1460 Dwelling Structures	\$ -	\$ 368,943	\$ 368,943	\$ 368,943		
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	1499 Mod used for Development	\$ -	\$ 461,179	\$ -	\$ -		
19	1502 Contingency (May not exceed 8% of line 20)	\$ -	\$ -	\$ -	\$ -		
20	Amount of Annual Grant (Sum of lines 2-19)	\$ -	\$ 461,179	\$ 461,179	\$ 461,179		
21	Amount of line 20 Related to LBP Activities	-	461,179	461,179	461,179		
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	-	-	-	-		

Signature of Executive Director: _____ Date: 5/8/12
 Signature of Public Housing Director:  Date: X
Henry A. Alvarez, III, Executive Director

¹To be completed for the Performance and Evaluation Report or Revised Annual Statement
²To be completed for the Performance and Evaluation Report

Annual Statement/Performance and Evaluation Report
 Capital Fund Program - CFP 2007 REPLACEMENT HOUSING FACTOR (CFP-RHF) - YEAR FIVE FIRST INCREMENT
 Part II: Supporting Pages

PHA Name: **SAN FRANCISCO HOUSING AUTHORITY** Grant Type and Number: Replacement Housing Factor Grant No: CA39R00150107 Federal FY of Grant: **CFP 2008(RHF)**

Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Funds Obligated	Funds Expended	Status of Work
				Original	Revised			
874-15 CAL 1-1B(3), Hunters View	Additional funding to build new Public Housing units.	1499	100%	\$ 461,179		\$ -	\$ -	
	ADMINISTRATION	1410	100%		\$ 46,118	\$ 46,118	\$ 46,118	Completed
	FEES & COSTS	1430	100%		\$ 46,118	\$ 46,118	\$ 46,118	Completed
	DWELLING STRUCTURES	1460	100%		\$ 368,943	\$ 368,943	\$ 368,943	Completed
						\$ -	\$ -	

Annual Statement/Performance and Evaluation Report Capital Fund Program - CFP 2007 REPLACEMENT HOUSING FACTOR (CFP-RHF) - YEAR FIVE FIRST INCREMENT Part III: Implementation Schedule 2008 CFP-RHF															
PHA Name:			Grant Type and Number										Federal FY of Grant:		
SAN FRANCISCO HOUSING AUTHORITY			All Fund Obligated (Quarter Ending Date)				Replacement Housing Factor No: CA39R0016010B All Funds Expended (Quarter Ending Date)				2008 CFP (RHF)		Reasons for Revised Target Dates		
Development Number Name/HA-Wide Activities			Original		Revised		Actual		Original		Revised			Actual	
974-15	CAL 1-18(3), Hunters, View	Additional funding to build new Public Housing units.	8/18/2010						8/18/2012						
		ADMINISTRATION		6/12/2010						6/12/2012					Completed
		FEES & COSTS		6/12/2010						6/12/2012					Completed
		DWELLING STRUCTURES		6/12/2010						6/12/2012					Completed



2012 CAPITAL FUND PROGRAM
ANNUAL SUBMISSION

P&ER FOR 2009 RHF AS OF 3/31/12

Part I: Summary

PHA Name: **SAN FRANCISCO HOUSING AUTHORITY**

Grant Type and Number: Replacement Housing Factor Grant No: **CA39R00150109**

Federal FY of Grant: (CFP 2009 / RHF) _____

FFY of Grant Approval: _____

Original Annual Statement: _____

Performance and Evaluation Report for Program Year Ending: 03/31/12.

Reserve for Disasters/ Emergencies

Revised Annual Statement/Revision Number: _____

Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³	\$ -	\$ -	\$ -	\$ -
3	1408 Management Improvements	\$ -	\$ -	\$ -	\$ -
4	1410 Administration (may not exceed 10% of line 21)	\$ 23,206	\$ -	\$ -	\$ -
5	1411 Audit	\$ -	\$ -	\$ -	\$ -
6	1415 Liquidated Damages	\$ -	\$ -	\$ -	\$ -
7	1430 Fees and Costs	\$ 18,565	\$ -	\$ -	\$ -
8	1440 Site Acquisition	\$ -	\$ -	\$ -	\$ -
9	1450 Site Improvement	\$ -	\$ -	\$ -	\$ -
10	1460 Dwelling Structures	\$ -	\$ -	\$ -	\$ -
11	1465.1 Dwelling Equipment—Nonexpendable	\$ -	\$ -	\$ -	\$ -
12	1470 Non-dwelling Structures	\$ -	\$ -	\$ -	\$ -
13	1475 Non-dwelling Equipment	\$ -	\$ -	\$ -	\$ -
14	1485 Demolition	\$ 23,000	\$ -	\$ -	\$ -
15	1492 Moving to Work Demonstration	\$ -	\$ -	\$ -	\$ -
16	1495.1 Relocation Costs	\$ -	\$ -	\$ -	\$ -
17	1499 Development Activities ⁴	\$ 167,292	\$ -	\$ -	\$ -
18a	1501 Collateralization or Debt Service paid by the PHA	\$ -	\$ -	\$ -	\$ -
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	\$ -	\$ -	\$ -	\$ -
19	1502 Contingency (may not exceed 8% of line 20)	\$ -	\$ -	\$ -	\$ -
20	Amount of Annual Grant: (sum of lines 2 – 19)	\$ 232,064	\$ -	\$ -	\$ -
21	Amount of line 20 Related to LBP Activities	\$ -	\$ -	\$ -	\$ -
22	Amount of line 20 Related to Section 504 Activities	\$ -	\$ -	\$ -	\$ -
23	Amount of line 20 Related to Security – Soft Costs	\$ -	\$ -	\$ -	\$ -
24	Amount of line 20 Related to Security – Hard Costs	\$ -	\$ -	\$ -	\$ -
25	Amount of line 20 Related to Energy Conservation Measures	\$ -	\$ -	\$ -	\$ -

Signature of Executive Director: **X** Henry A. Alvarez III, Executive Director

Date: 7/15/2012

Signature of Public Housing Director: _____

Date: _____

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHF funds shall be included here.

Part III: Implementation Schedule

PHA Name:			Grant Type and Number		Federal FY of Grant:	
SAN FRANCISCO HOUSING AUTHORITY			Replacement Housing Factor No: CA30R00150709		2009 CFP (RHF)	
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹	
	Original	Actual	Original	Actual		
CAL 1-18(3), Hunters View Additional funding to build new Public Housing units.	9/14/2011		9/14/2013		Work in Progress	
Demolition	9/14/2011		9/14/2013		Work in Progress	
Fees & Costs	9/14/2011		9/14/2013		Work in Progress	
Administration	9/14/2011		9/14/2013		Work in Progress	

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9(j) of the U.S. Housing Act of 1937, as amended.



2012 CAPITAL FUND PROGRAM
ANNUAL SUBMISSION

P&ER FOR 2010 RHF AS OF 3/31/12

Part I: Summary

PHA Name: **SAN FRANCISCO HOUSING AUTHORITY**

Grant Type and Number: **Replacement Housing Factor Grant No: CA39R00150110**

Federal FY of Grant: **SEP 2010 (RHE)**

FFY of Grant Approval:

Line No.	Original	Revised ²	Total Actual Cost ¹	
			Obligated	Expended
1	Total non-CFP Funds			
2	1406 Operations (may not exceed 20% of line 21) ³	\$ -	\$ -	\$ -
3	1408 Management Improvements	\$ -	\$ -	\$ -
4	1410 Administration (may not exceed 10% of line 21)	\$ 32,777	\$ -	\$ -
5	1411 Audit	\$ -	\$ -	\$ -
6	1415 Liquidated Damages	\$ -	\$ -	\$ -
7	1430 Fees and Costs	\$ 22,000	\$ -	\$ -
8	1440 Site Acquisition	\$ -	\$ -	\$ -
9	1450 Site Improvement	\$ -	\$ -	\$ -
10	1460 Dwelling Structures	\$ -	\$ -	\$ -
11	1485.1 Dwelling Equipment—Nonexpendable	\$ -	\$ -	\$ -
12	1470 Non-dwelling Structures	\$ -	\$ -	\$ -
13	1475 Non-dwelling Equipment	\$ -	\$ -	\$ -
14	1485 Demolition	\$ 23,000	\$ -	\$ -
15	1492 Moving to Work Demonstration	\$ -	\$ -	\$ -
16	1495.1 Relocation Costs	\$ -	\$ -	\$ -
17	1499 Development Activities ⁴	\$ 250,000	\$ -	\$ -
18a	1501 Collateralization or Debt Service paid by the PHA	\$ -	\$ -	\$ -
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	\$ -	\$ -	\$ -
19	1502 Contingency (may not exceed 8% of line 20)	\$ -	\$ -	\$ -
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$ 327,777	\$ -	\$ -
21	Amount of line 20 Related to LBP Activities	\$ -	\$ -	\$ -
22	Amount of line 20 Related to Section 504 Activities	\$ -	\$ -	\$ -
23	Amount of line 20 Related to Security - Soft Costs	\$ -	\$ -	\$ -
24	Amount of line 20 Related to Security - Hard Costs	\$ -	\$ -	\$ -
25	Amount of line 20 Related to Energy Conservation Measures	\$ -	\$ -	\$ -

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHF funds shall be included here.

Part I: Summary	
PHA Name: SAN FRANCISCO HOUSING AUTHORITY	Grant Type and Number Replacement Housing Factor Grant No: CA39R00150110
<input type="checkbox"/> Original Annual Statement. <input checked="" type="checkbox"/> Performance and Evaluation Report for Program Year Ending: 01/31/12	Federal FY of Grant: (CFP 2010 (RHE))
<input type="checkbox"/> Reserve for Disasters/Emergencies	[] FY of Grant Approval: [] Revised Annual Statement/Revision Number: [] Final Performance and Evaluation Report
Summary by Development Account	
Line No.	Total Estimated Cost
Original	Revised²
Expended	Total Actual Cost¹
Date	Date
Signature of Executive Director	Signature of Public Housing Director
X Henry A. Alvarez III, Executive Director	X

Part II: Supporting Pages

PHA Name: **SAN FRANCISCO HOUSING AUTHORITY**
 Grant Type and Number: Replacement Housing Factor Grant No: **CA39R00150110**
 Federal FY of Grant: **CFP 2010 (RHF)**

Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
CAL 1-18(3), Hunters View	Additional funding to build new Public Housing units.	1499	100%	\$ 250,000				Work in Progress
	Demolition	1485	100%	\$ 23,000				Work in Progress
	Fees & Costs	1490	100%	\$ 22,000				Work in Progress
	Administration	1410	100%	\$ 32,777				Work in Progress
Total Grant:				\$ 327,777				

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

Part III: Implementation Schedule

PHA Name:		Grant Type and Number		Federal FY of Grant:	
SAN FRANCISCO HOUSING AUTHORITY		Replacement Housing Factor No: CA39R00150110		2010 CFP (RHF)	
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹
	Original	Actual	Original	Actual	
CAL 1-18(3), Hunters View Additional funding to build new Public Housing units.	8/18/2012		8/18/2014		Work in Progress
Demolition	8/18/2012		8/18/2014		Work in Progress
Fees & Costs	8/18/2012		8/18/2014		Work in Progress
Administration	8/18/2012		8/18/2014		Work in Progress

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.



2012 CAPITAL FUND PROGRAM
ANNUAL SUBMISSION

P&ER FOR 2011 RHF AS OF 3/31/12

Part I: Summary

PH/A Name: **SAN FRANCISCO HOUSING AUTHORITY**

Grant Type and Number
 Replacement Housing Factor Grant No: CA39R00150211

Federal FY of Grant:
 CFP 2011 (RHE)

FFY of Grant Approval:

Line No.	Original Annual Statement: Performance and Evaluation Report for Program Year Ending: 09/30/12	Reserve for Disasters/ Emergencies		Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended		
1	Total non-CFP Funds	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2	1406 Operations (may not exceed 20% of line 21) ³	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
3	1408 Management Improvements	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
4	1410 Administration (may not exceed 10% of line 21)	\$ 38,434	\$ -	\$ -	\$ -	\$ -	\$ -
5	1411 Audit	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
6	1415 Liquidated Damages	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
7	1430 Fees and Costs	\$ 20,000	\$ -	\$ -	\$ -	\$ -	\$ -
8	1440 Site Acquisition	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
9	1450 Site Improvement	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
10	1460 Dwelling Structures	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11	1465.1 Dwelling Equipment—Nonexpendable	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
12	1470 Non-dwelling Structures	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
13	1475 Non-dwelling Equipment	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
14	1485 Demolition	\$ 20,000	\$ -	\$ -	\$ -	\$ -	\$ -
15	1492 Moving to Work Demonstration	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
16	1495.1 Relocation Costs	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
17	1499 Development Activities ⁴	\$ 305,908	\$ -	\$ -	\$ -	\$ -	\$ -
18a	1501 Collateralization or Debt Service paid by the PHA	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
19	1502 Contingency (may not exceed 8% of line 20)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$ 384,342	\$ -	\$ -	\$ -	\$ -	\$ -
21	Amount of line 20 Related to LBP Activities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
22	Amount of line 20 Related to Section 504 Activities	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
23	Amount of line 20 Related to Security - Soft Costs	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
24	Amount of line 20 Related to Security - Hard Costs	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
25	Amount of line 20 Related to Energy Conservation Measures	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHF funds shall be included here.

Part I: Summary									
PHA Name: SAN FRANCISCO HOUSING AUTHORITY	Grant Type and Number Replacement / Housing Factor Grant No: CA39R00180211								
Federal FY of Grant: CFP 2011 (RHE)									
FFY of Grant Approval:									
<input type="checkbox"/> Original Annual Statement <input checked="" type="checkbox"/> Performance and Evaluation Report for Program Year Ending: 03/31/12									
<input type="checkbox"/> Reserve for Disasters/ Emergencies <input type="checkbox"/> Revised Annual Statement/Revision Number: _____ <input type="checkbox"/> Final Performance and Evaluation Report									
Line No.	Summary by Development Account								
	<table border="1"> <tr> <th colspan="2">Total Estimated Cost</th> </tr> <tr> <td>Original</td> <td>Revised²</td> </tr> <tr> <td></td> <td>Total Actual Cost¹</td> </tr> <tr> <td>Obligated</td> <td>Expanded</td> </tr> </table>	Total Estimated Cost		Original	Revised ²		Total Actual Cost ¹	Obligated	Expanded
Total Estimated Cost									
Original	Revised ²								
	Total Actual Cost ¹								
Obligated	Expanded								

Signature of Executive Director: _____ Date: 7/15/2012

Signature of Public Housing Director: _____ Date: _____

X **Henry A. Alvarez III, Executive Director**

Annual Statement / Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB Approval No. 2577-0226
 (exp. 4/30/2011)

Part II: Supporting Pages

PHA Name: SAN FRANCISCO HOUSING AUTHORITY		Grant Type and Number Replacement Housing Factor Grant No: CA39R00150211	Federal FY of Grant: CFP 2011 (RHF)					
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
CAL 1-18(3), Hunters View	Additional funding to build new Public Housing units.	1499	100%	\$ 305,908				Work in Progress
	Demolition	1485	100%	\$ 20,000				Work in Progress
	Fees & Costs	1430	100%	\$ 20,000				Work in Progress
	Administration	1410	100%	\$ 38,434				Work in Progress
Total Grant:				\$	384,342			

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
² To be completed for the Performance and Evaluation Report.



2012 CAPITAL FUND PROGRAM
ANNUAL SUBMISSION

P&ER FOR 2009 ARRA CFP AS OF 3/31/12



U.S. Department of Housing and Urban Development
San Francisco Regional Office - Region IX
600 Harrison Street
San Francisco, California 94107-1387
www.hud.gov
espanol.hud.gov

MAY 04 2012

Mr. Henry Alvarez
Executive Director
San Francisco Housing Authority
1815 Egbert Avenue
San Francisco, CA 94102

Dear Mr. Alvarez:

Subject: Approval for Audit of the Actual Modernization Cost Certificate (AMCC) for American Recovery and Reinvestment Act (Recovery Act) Grant CA39S00150109

In association with the subject Recovery Act grant funded in Federal Fiscal Year 2009, we acknowledge receipt of the AMCC, form HUD-53001, and the final Annual Statement/Performance and Evaluation Report, HUD-50075.1, for the completed grant.

Per criteria found at 24 CFR 968.145 pertaining to fiscal closeout, HUD has entered a ~~Pre-Audit date in the Line of Credit Control System (LOCCS) for the Recovery Act grant and you~~ are no longer required to submit monthly reports in LOCCS for this grant. Now that your grant is in Pre-Audit status, you are required to include the enclosed cost certificate in your next scheduled fiscal year audit. You are required to submit the Independent Public Accountant audited financial documentation to the HUD Public Housing Field Office Director within 9 months after the beginning of your next fiscal year cycle. Once the audited grant information has been reviewed by the Field Office, HUD will provide your Housing Authority with a final closeout package containing a copy of the HUD approved executed cost certificate and closeout letter for your records.

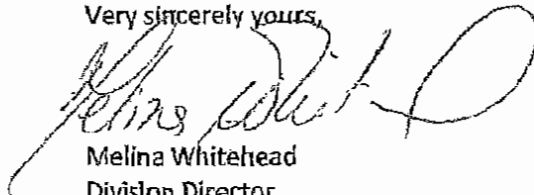
Please remember according to record keeping requirements in 24 CFR § 85.26: (a) The PHA will maintain full and complete records of the history of each Capital Fund grant [including Capital Fund Recovery Act grants], including, but not limited to, CFP 5-Year Action Plans, procurement, contracts, obligations, and expenditures. (b) The PHA shall retain all documents related to the activities for which the Capital Fund grant [including Capital Fund Recovery Act grants], was received for 5 years after HUD approves either the actual development or modernization cost certificate, unless a longer period is required by applicable law. (c) HUD and its duly authorized representatives shall have full and free access to all PHA offices, facilities, books, documents, and records, including the right to audit and make copies.

If your housing authority is not subject to a fiscal audit because it does not meet the Single Audit Act expenditures threshold, additional guidance will be provided regarding the close-out process. Please verify that the increase in total Federal Grant expenditures due to

Recovery Act Grants has not pushed your housing authority above the Single Audit Act threshold.

Enclosed you will find a copy of the approved for audit cost certificate HUD-53001, and the final Annual Statement/Performance and Evaluation Report, HUD-50075.1, for your records. HUD is maintaining the original cost certificate for our records. If you have any questions concerning this matter, please contact Norma Penamante at 415-489-6441, or via e-mail at Norma.Penamante@hud.gov.

Very sincerely yours,

A handwritten signature in black ink, appearing to read "Melina Whitehead", written in a cursive style.

Melina Whitehead
Division Director
Office of Public Housing

Enclosures

**Actual Modernization
Cost Certificate**

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

OMB Approval No. 2577-0157 (exp. 01/31/2014)

Comprehensive Improvement Assistance Program (CIAP)
Comprehensive Grant Program (CGP)

Public reporting burden for this collection of information is estimated to average 2 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 Office, Paperwork Reduction Project (2577-0044 and 0157), Office of Information Technology, U.S. Department of Housing and Urban Development, Washington, D.C. 20410-3600. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless that collection displays a valid OMB control number.

Do not send this form to the above address.

This collection of information requires that each Housing Authority (HA) submit information to enable HUD to initiate the fiscal closeout process. The information will be used by HUD to determine whether the modernization grant is ready to be audited and closed out. The information is essential for audit verification and fiscal close out. Responses to the collection are required by regulation. The information requested does not end itself to confidentiality.

HA Name: SAN FRANCISCO HOUSING AUTHORITY	Modernization Project Number: CA39S001501-09
--	--

The HA hereby certifies to the Department of Housing and Urban Development as follows:

1. That the total amount of Modernization Cost (herein called the "Actual Modernization Cost") of the Modernization Grant, is as shown below:

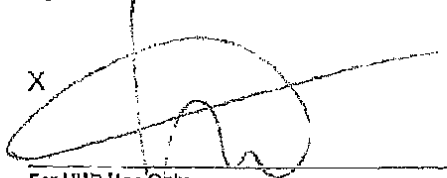
A. Original Funds Approved	\$ 17,876,716.00
B. Funds Disbursed	\$ 17,876,716.00
C. Funds Expended (Actual Modernization Cost)	\$ 17,876,716.00
D. Amount to be Recaptured (A-C)	\$
E. Excess of Funds Disbursed (B-C)	\$

- That all modernization work in connection with the Modernization Grant has been completed;
- That the entire Actual Modernization Cost or liabilities therefor incurred by the HA have been fully paid;
- That there are no undischarged mechanics', laborers', contractors', or material-men's liens against such modernization work on file in any public office where the same should be filed in order to be valid against such modernization work; and
- That the time in which such liens could be filed has expired.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

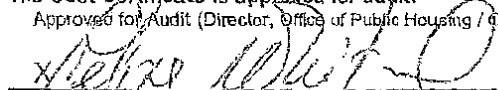
Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Signature of Executive Director & Date:

X 

For HUD Use Only

The Cost Certificate is approved for audit:

Approved for Audit (Director, Office of Public Housing / ONAP Administrator) 	Date: 5.4.12
---	------------------------

The audited costs agree with the costs shown above:

Verified: (Designated HUD Official)	Date:
X	

Approved: (Director, Office of Public Housing / ONAP Administrator)	Date:
X	

Part I: Summary

PHIA Name: **SAN FRANCISCO HOUSING AUTHORITY**

Grant Type and Number: **Capital Fund Program Grant No: CAJ9S00150109 (ARRA)**

FFY of Grant: **2009**

Date of CRFP: **2009**

FFY of Grant Approval: **2009**

Type of Grant: **Original Annual Statement**

Revised Annual Statement (revision no:)

Performance and Evaluation Report for Period Ending: **3/31/10**

Final Performance and Evaluation Report

Line	Summary by Development Account	Total Estimated Cost	Revised ²	Obligated	Total Actual Cost ¹	Expended
1	Total non-CRF Funds					
2	1406 Operations (may not exceed 20% of line 21) ³					
3	1408 Management Improvements					
4	1410 Administrative (may not exceed 10% of line 21)	\$ 1,787,672	\$ 1,787,672		\$ 1,787,672	\$ 1,787,672
5	1411 Audit					
6	1415 Liquidated Damages					
7	1430 Fees and Cores	\$ -	\$ 2,837,700		\$ 2,837,700	\$ 2,837,700
8	1440 Site Acquisition					
9	1450 Site Improvements	\$ 406,000	\$ 3,568,300		\$ 3,568,300	\$ 3,568,300
10	1460 Dwelling Structures	\$ 13,489,214	\$ 9,489,214		\$ 9,489,214	\$ 9,489,214
11	1465.1 Dwelling Equipment--Nonexpendable					
12	1470 Non-dwelling Structures	\$ 93,830	\$ 193,830		\$ 193,830	\$ 193,830
13	1475 Non-dwelling Equipment					
14	1485 Demolition					
15	1492 Moving to Work Demonstration					
16	1495.1 Relocation Costs					
17	1499 Development Activities ⁴	\$ -	\$ -		\$ -	\$ -
18a	1501 Collateralization or Debt Service paid by the PHIA					
18b	9000 Collateralization or Debt Service paid Via System of Direct Payment					
19	1502 Contingency (may not exceed 8% of line 20)					
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$ 17,876,716	\$ 17,876,716		\$ 17,876,716	\$ 17,876,716
21	Amount of line 20 Related to LBP Activities	\$ 3,535,722	\$ 3,535,722		\$ 3,535,722	\$ 3,535,722
22	Amount of line 20 Related to Security - Soft Costs	\$ -	\$ -		\$ -	\$ -
23	Amount of line 20 Related to Security - Hard Costs	\$ -	\$ -		\$ -	\$ -
24	Amount of line 20 Related to Security - Other Costs	\$ -	\$ -		\$ -	\$ -
25	Amount of line 20 Related to Energy Conservation Measures	\$ 140,581	\$ 140,581		\$ 140,581	\$ 140,581

Signature of Executive Director: *[Signature]* Date: 5/21/10

Signature of Public Housing Director: *[Signature]* Date: 6-4-10

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CRF Grants for operations.

⁴ CRF funds shall be included here.

SAN FRANCISCO HOUSING AUTHORITY
ARRA LOCCS DRAW SUMMARY

Annual Statement of Performance and Evaluation Report
AMERICAN RECOVERY & REINVESTMENT ACT OF 2009

Part II: Supporting Pages

Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Revised 7/28/10	Funds Obligated	Funds Expended	Status of Work
				Original	Revised				
Grant Type and Number ARRA Grant No: CA396001501-09 Federal FY of Grant: ARRA 2009									
Administration Fees @ 10% of Total Grant		1410	100%	\$ 1,787,872	\$ 1,787,872	\$ 1,787,872	\$ 1,787,872	\$ 1,787,872	Work in progress
AMP #874-CAL 1-18(3), Hunters View	Fees and Costs	1433	100%	\$ -	\$ 2,837,700	\$ 2,837,700	\$ 2,837,700	\$ 2,837,700	Fees and Costs - hunters view
AMP #86-CAL 1-1, Holly Courts	Kitchen & Bathroom Upgrade	1450	100%	\$ 6,000,000	\$ -	\$ -	\$ -	\$ -	At-Paraph to H. View
AMP #86B-CAL 1-1, Holly Courts	Exterior Improvements (Landscaping)	1450	100%	\$ 406,000	\$ -	\$ 406,000	\$ 406,000	\$ 406,000	Work in progress, Bayview Painting
AMP #86-CAL 1-1, Holly Courts	Paint and LBP Stabilization	1460	100%	\$ 150,000	\$ -	\$ 150,000	\$ 150,000	\$ 150,000	Work in progress, Bayview Painting
AMP #869-CAL 1-1, Holy Courts	Kitchen & Bathroom Upgrades	1460	100%	\$ -	\$ -	\$ -	\$ -	\$ -	CANCELLED
AMP #867-CAL 1-2, Putnam Terrace	Paint and LBP Stabilization and Exterior Improvements	1460	100%	\$ 861,000	\$ -	\$ 861,000	\$ 861,000	\$ 861,000	Work completed - Bayview Painting
AMP #87-CAL 1-10, Polero Annex	Paint and LBP Stabilization and Exterior Improvements	1460	100%	\$ 369,000	\$ -	\$ 369,000	\$ 369,000	\$ 369,000	Work completed - Bayview Painting
AMP #873-CAL 1-17A, Hunters Point East	Paint and LBP Stabilization and Exterior Improvements	1460	100%	\$ 422,400	\$ -	\$ 422,400	\$ 422,400	\$ 422,400	Work completed - Bayview Painting
AMP #873-CAL 1-17A, Hunters Point West	Paint and LBP Stabilization and Exterior Improvements	1460	100%	\$ 345,800	\$ -	\$ 345,800	\$ 345,800	\$ 345,800	Work completed - Bayview Painting
AMP #874-CAL 1-18(3), Hunters View	Site Improvement	1460	100%	\$ -	\$ 3,162,300	\$ 3,162,300	\$ 3,162,300	\$ 3,162,300	Hunters View Site Improvement
AMP #875-CAL 1-18(4), Alice Griffith	Paint and LBP Stabilization and Exterior Improvements	1460	100%	\$ 544,534	\$ -	\$ 544,534	\$ 544,534	\$ 544,534	Work completed - Bayview Painting
AMP #876-CAL 1-19(1), 990 Pacific	Exterior Painting	1460	100%	\$ 139,000	\$ -	\$ 139,000	\$ 139,000	\$ 139,000	Work completed - Super Home Painting (Best Modern)
AMP #877-CAL 1-32, 1780 Blue	Fire Alarm System replacement	1460	100%	\$ 240,000	\$ -	\$ 240,000	\$ 240,000	\$ 240,000	Work completed - Nesta Construction Electric
AMP #877-CAL 1-33, 1860 Pine	Fire Alarm System replacement	1460	100%	\$ 246,589	\$ -	\$ 246,589	\$ 246,589	\$ 246,589	Work completed - Nesta Construction Electric
AMP #878-CAL 1-18(10), Woodside Gardens	Fire Alarm System replacement	1460	100%	\$ 250,000	\$ -	\$ 250,000	\$ 250,000	\$ 250,000	Work in progress - Nesta Construction
AMP #880-CAL 1-30, Duboce	Exterior Painting	1460	100%	\$ 56,240	\$ -	\$ 56,240	\$ 56,240	\$ 56,240	Work completed - Super Home (Best Modern)
AMP #880, CAL 1-34, Nob	Exterior Painting	1460	100%	\$ 28,490	\$ -	\$ 28,490	\$ 28,490	\$ 28,490	Work completed - Super Home (Best Modern)
AMP #881-CAL 1-27, 350 Ellis	Ventilation System Improvements	1460	100%	\$ 142,551	\$ -	\$ 142,551	\$ 142,551	\$ 142,551	Work completed - KCM Construction
AMP #892-CAL 1-20, 191R & Dorland	Exterior Painting	1460	100%	\$ 137,270	\$ -	\$ 137,270	\$ 137,270	\$ 137,270	Work completed - Super Home (Best Modern)
AMP #895-CAL 1-34, 230 Randolph	Paint and LBP Stabilization and Exterior Improvements	1460	100%	\$ 445,188	\$ -	\$ 445,188	\$ 445,188	\$ 445,188	Work completed - Nesta Construction
AMP #896, CAL 1-31, 25 Sanchez	Community Room/Laundry	1470	100%	\$ 193,830	\$ -	\$ 193,830	\$ 193,830	\$ 193,830	Work completed - FDC Construction

Part III: Implementation Schedule for Capital Fund Financing Program									
PHFA Name: SAN FRANCISCO HOUSING AUTHORITY	Development Number Nant/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹			
		Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date				
	Administration Fees @ 10% of total Grant	3/17/2010	3/15/2010	3/17/2012	12/31/2011	Work in progress			
AMP #966-CAL 1-1, Holly Courts	Kitchen & Bathroom Upgrade	3/17/2010	3/15/2010	3/17/2012		Re-Programmed to Hunters View			
AMP #966-CAL 1-1, Holly Courts	Exterior Improvements (Landscaping)	3/17/2010	2/19/2010	3/17/2012	1/21/2011	Work in progress			
AMP #966-CAL 1-1, Holly Courts	Paint and LBP Stabilization	3/17/2010	2/19/2010	3/17/2012	9/1/2010	Work Completed			
AMP #967-CAL 1-2, Potrero Terrace	Paint and LBP Stabilization and Exterior Improvements	3/17/2010	6/16/2009	3/17/2012	9/1/2010	Work Completed			
AMP #971-CAL 1-10, Potrero Annex	Paint and LBP Stabilization and Exterior Improvements	3/17/2010	6/16/2009	3/17/2012	9/1/2010	Work in progress			
AMP #973-CAL 1-17A, Hunters Point East	Paint and LBP Stabilization and Exterior Improvements	3/17/2010	6/16/2009	3/17/2012	6/5/2010	Work Completed			
AMP #973-CAL 1-17A, Hunters Point West	Paint and LBP Stabilization and Exterior Improvements	3/17/2010	6/16/2009	3/17/2012	6/5/2010	Work in progress			
AMP #974-CAL 1-18(3), Hunters View	Re-development Lease	3/17/2010	3/15/2010	3/17/2012	12/31/2011	Work Completed			
AMP #975-CAL 1-18(4), Alice Griffith	Paint and LBP Stabilization and Exterior Improvements	3/17/2010	6/16/2009	3/17/2012	2/19/2010	Work Completed			
AMP #976-CAL 1-19(1), 990 Pacific	Exterior Painting	3/17/2010	3/15/2010	3/17/2012	12/1/2010	Work Completed			
AMP #977-CAL 1-32, 1760 Bush	Fire Alarm System replacement	3/17/2010	2/11/2010	3/17/2012	8/12/2010	Work Completed			
AMP #977-CAL 1-23, 1880 Pine	Fire Alarm System replacement	3/17/2010	2/22/2010	3/17/2012	8/12/2010	Work Completed			
AMP #979-CAL 1-18(10), Woodside Gardens	Fire Alarm System replacement	3/17/2010	2/24/2010	3/17/2012	10/12/2010	Work Completed			
AMP #982-CAL 1-30, Duboce	Exterior Painting	3/17/2010	3/15/2010	3/17/2012	9/15/2010	Work in progress			
AMP #980, CAL 1-34, Noe	Exterior Painting	3/17/2010	3/15/2010	3/17/2012	9/15/2010	Work in progress			
AMP #981-CAL 1-27, 350 Ellis	Ventilation System improvements	3/17/2010	6/16/2009	3/17/2012	1/23/2010	Work Completed			
AMP #982-CAL 1-20, 18th & Doland	Exterior Painting	3/17/2010	3/15/2010	3/17/2012	9/15/2010	Work Completed			
AMP #983-CAL 1-34, 200 Randolph	Paint and LBP Stabilization and Exterior Improvements	3/17/2010	6/16/2009	3/17/2012	5/14/2010	Work Completed			
AMP #985, CAL 1-31, 25 Sanchez	Community Room/Study	3/17/2010	3/15/2010	3/17/2012	7/15/10	Work Completed			
PHA Wide - Vacant Units	Rehabilitate Public Housing Vacant Units PHA Wide.	3/17/2010	5/15/2010	3/17/2012	Various Dates	Work Completed by Force Account			

¹ Obligation and expenditure end dates can only be revised with HUD approval pursuant to Section 91 of the U.S. Housing Act of 1957, as amended



2012 CAPITAL FUND PROGRAM
ANNUAL SUBMISSION

P&ER FOR 2009 ARRA CFRC (PING YUEN) AS OF 3/31/12

Annual Statement / Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OIH Approval No. 2577-0157
 (exp. 11/30/2009)

Part I: Summary

PHA Name: **SAN FRANCISCO HOUSING AUTHORITY**
 Grant Type and Number: **Replacement Housing Factor Grant No: CA00100095509E**
 Federal FY of Grant: **CFP 2009 (CERB) - PING YUEN**
 FFY of Grant Approval:

Original Annual Statement: Revised Annual Statement/Revision Number: _____
 Performance and Evaluation Report for Program Year Ending: 3/31/12
 Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost		Revised ²	Obligated	Expended
		Original	Total Actual Cost ¹			
1	Total Non-CFP Funds	\$ 2,316,340	\$ 2,316,340	\$ 2,316,340	\$ 2,316,340	\$ -
2	1406 Operations (may not exceed 20% of line 21) ³	\$ -	\$ -	\$ -	\$ -	\$ -
3	1408 Management Improvements	\$ -	\$ -	\$ -	\$ -	\$ -
4	1410 Administration (may not exceed 10% of line 21)	\$ 511,410	\$ 511,410	\$ 511,410	\$ 511,410	\$ 439,301
5	1411 Audit	\$ -	\$ -	\$ -	\$ -	\$ -
6	1415 Liquidated Damages	\$ -	\$ -	\$ -	\$ -	\$ -
7	1430 Fees and Costs	\$ -	\$ -	\$ -	\$ -	\$ -
8	1440 Site Acquisition	\$ -	\$ -	\$ -	\$ -	\$ -
9	1450 Site Improvement	\$ -	\$ -	\$ -	\$ -	\$ -
10	1460 Dwelling Structures	\$ 7,990,596	\$ 7,990,596	\$ 7,990,596	\$ 7,990,596	\$ 6,864,374
11	1465.1 Dwelling Equipment—Nonexpendable	\$ -	\$ -	\$ -	\$ -	\$ -
12	1470 Non-dwelling Structures	\$ -	\$ -	\$ -	\$ -	\$ -
13	1475 Non-dwelling Equipment	\$ -	\$ -	\$ -	\$ -	\$ -
14	1485 Demolition	\$ -	\$ -	\$ -	\$ -	\$ -
15	1492 Moving to Work Demonstration	\$ -	\$ -	\$ -	\$ -	\$ -
16	1495.1 Relocation Costs	\$ -	\$ -	\$ -	\$ -	\$ -
17	1499 Development Activities ⁴	\$ -	\$ -	\$ -	\$ -	\$ -
18a	1501 Collateralization or Debt Service paid by the PHA	\$ -	\$ -	\$ -	\$ -	\$ -
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	\$ -	\$ -	\$ -	\$ -	\$ -
19	1502 Contingency (may not exceed 8% of line 20)	\$ -	\$ -	\$ -	\$ -	\$ -
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$ 8,502,006	\$ 8,502,006	\$ 8,502,006	\$ 8,502,006	\$ 7,303,374
21	Amount of line 20 Related to LBP Activities	\$ -	\$ -	\$ -	\$ -	\$ -
22	Amount of line 20 Related to Section 504 Activities	\$ -	\$ -	\$ -	\$ -	\$ -
23	Amount of line 20 Related to Security - Soft Costs	\$ -	\$ -	\$ -	\$ -	\$ -
24	Amount of line 20 Related to Security - Hard Costs	\$ -	\$ -	\$ -	\$ -	\$ -
25	Amount of line 20 Related to Energy Conservation Measures	\$ 8,502,006	\$ 8,502,006	\$ 8,502,006	\$ 8,502,006	\$ 7,303,374

Signature of Executive Director: **Henry A. Alvarez III, Executive Director** Date: 6/24/2011
 Signatures of Public Housing Director: **X** Date:

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHF funds that be included here.

Part II: Supporting Pages

Development Number Name/HA-Wide Activities		General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
CHA Name:					Original	Revised	Funds Obligated ¹	Funds Expended ²	
SAN FRANCISCO HOUSING AUTHORITY									
Grant Type and Number Replacement Housing Factor Grant No: CA00100095509R									Federal FY of Grant: CFP 2009 (CFRC)
AMP 955 - PING YUEN	Window Replacement	1460	100%	\$ 4,323,021	\$ 4,323,021	\$ 4,323,021	\$ 3,706,600	Work in progress	
	Heating Pipe Replacement	1460	100%	\$ 3,667,575	\$ 3,667,575	\$ 3,667,575	\$ 3,157,474	Work in progress	
	Administration (6.4% of total Grant)	1410	100%	\$ 511,410	\$ 511,410	\$ 511,410	\$ 439,301	Work in progress	
Total Grant:				\$ 8,502,006	\$ 8,502,006	\$ 8,502,006	\$ 7,303,374		

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
² To be completed for the Performance and Evaluation Report.

Part II: Implementation Schedule

PHA Name:		Grant Type and Number			Federal FY of Grant:
SAN FRANCISCO HOUSING AUTHORITY		Replacement Housing Factor No: CA00100095509R			CFP 2008 (CFRC)
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹
	Original	Actual	Original	Actual	
AMP 955 Ping Yuen	9/23/2010	9/22/2010	9/23/2012		Work in progress
Heating Pipe Replacement	9/23/2010	9/22/2010	9/23/2012		Work in progress
Administration	9/23/2010	9/22/2010	9/23/2012		Work in progress

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.



2012 CAPITAL FUND PROGRAM
ANNUAL SUBMISSION

P&ER FOR 2009 ARRA CFRC (PINE/BUSH) AS OF 3/31/12

Part I: Summary

PHA Name: **SAN FRANCISCO HOUSING AUTHORITY**

Grant Type and Number
 Replacement Housing Factor Grant No: **CA00100095609R**

Federal FY of Grant:
CFP 2009 (CERC) - PINE & BUSH

FFY of Grant Approval:

Original Annual Statement;
 Performance and Evaluation Report for Program Year Ending: **3/31/12**
 Reserve for Disasters/Emergencies
 Revised Annual Statement/Revision Number: _____
 Final Performance and Evaluation Report

Summary by Development Account

Line No.	Description	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds	\$ 2,508,858	\$ 2,508,858	\$ 2,508,858	\$ -
2	1406 Operations (may not exceed 20% of line 21) ³	\$ -	\$ -	\$ -	\$ -
3	1408 Management Improvements	\$ -	\$ -	\$ -	\$ -
4	1410 Administration (may not exceed 10% of line 21)	\$ 239,760	\$ 239,760	\$ 239,760	\$ 215,683
5	1411 Audit	\$ -	\$ -	\$ -	\$ -
6	1415 Liquidated Damages	\$ -	\$ -	\$ -	\$ -
7	1430 Fees and Costs	\$ -	\$ -	\$ -	\$ -
8	1440 Site Acquisition	\$ -	\$ -	\$ -	\$ -
9	1450 Site Improvement	\$ -	\$ -	\$ -	\$ -
10	1460 Dwelling Structures	\$ 3,756,234	\$ 3,756,234	\$ 3,756,234	\$ 3,380,611
11	1465.1 Dwelling Equipment--Nonexpendable	\$ -	\$ -	\$ -	\$ -
12	1470 Non-dwelling Structures	\$ -	\$ -	\$ -	\$ -
13	1475 Non-dwelling Equipment	\$ -	\$ -	\$ -	\$ -
14	1485 Demolition	\$ -	\$ -	\$ -	\$ -
15	1492 Moving to Work Demonstration	\$ -	\$ -	\$ -	\$ -
16	1495.1 Relocation Costs	\$ -	\$ -	\$ -	\$ -
17	1499 Development Activities ⁴	\$ -	\$ -	\$ -	\$ -
18a	1501 Collateralization or Debt Service paid by the PHA	\$ -	\$ -	\$ -	\$ -
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	\$ -	\$ -	\$ -	\$ -
19	1502 Contingency (may not exceed 8% of line 20)	\$ -	\$ -	\$ -	\$ -
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$ 3,995,994	\$ 3,995,994	\$ 3,995,994	\$ 3,596,294
21	Amount of line 20 Related to LBP Activities	\$ -	\$ -	\$ -	\$ -
22	Amount of line 20 Related to Section 504 Activities	\$ -	\$ -	\$ -	\$ -
23	Amount of line 20 Related to Security - Soft Costs	\$ -	\$ -	\$ -	\$ -
24	Amount of line 20 Related to Security - Hard Costs	\$ -	\$ -	\$ -	\$ -
25	Amount of line 20 Related to Energy Conservation Measures	\$ 3,995,994	\$ 3,995,994	\$ 3,995,994	\$ 3,596,294

Signature of Executive Director

Signature of Public Housing Director

Date

Date

X

Henry A. Alvarez III, Executive Director

5/23/2012

X

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHF funds shall be included here.

Part III: Implementation Schedule

PHA Name:		Grant Type and Number			Federal FY of Grant:	
SAN FRANCISCO HOUSING AUTHORITY		Replacement Housing Factor No: CA00700095609R			CFP 2009 (CFRC)	
		Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)	All Funds Expended (Quarter Ending Date)	Reasons for Revised Target Dates ¹	
	Original	Actual	Original	Actual		
AMP 956 Westside Court - 1880 Pine	9/23/2010	9/22/2010	9/23/2012		Work in progress	
AMP 956 Westside Court - 1760 Bush	9/23/2010	9/22/2010	9/23/2012		Work in progress	
Administration	9/23/2010	9/22/2010	9/23/2012		Work in progress	

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.



2012 CAPITAL FUND PROGRAM
ANNUAL SUBMISSION

P&ER FOR 2009 ARRA CFRC (ROSA PARKS) AS OF 3/31/12

Part I: Summary

PHA Name: **SAN FRANCISCO HOUSING AUTHORITY**

Grant Type and Number: **Replacement Housing Factor Grant No: CA00100095709E**

Federal FY of Grant: **CFP 2009 (CFRC) - ROSA PARKS**

FFY of Grant Approval: _____

Original Annual Statement: _____ Revised Annual Statement/Revision Number: _____

Performance and Evaluation Report for Program Year Ending: 3/31/12

Reserve for Disasters/ Emergencies

Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost			Total Actual Cost ¹		
		Original	Revised ²	Obligated	Obligated	Expended	
1	Total non-CFP Funds	\$ 1,600,211	\$ 1,600,211	\$ 1,600,211	\$ 1,600,211	\$ -	
2	1406 Operations (may not exceed 20% of line 21) ³	\$ -	\$ -	\$ -	\$ -	\$ -	
3	1408 Management Improvements	\$ -	\$ -	\$ -	\$ -	\$ -	
4	1410 Administration (may not exceed 10% of line 21)	\$ 132,417	\$ 132,417	\$ 132,417	\$ 132,417	\$ 128,426	
5	1411 Audit	\$ -	\$ -	\$ -	\$ -	\$ -	
6	1415 Liquidated Damages	\$ -	\$ -	\$ -	\$ -	\$ -	
7	1430 Fees and Costs	\$ 132,417	\$ -	\$ -	\$ -	\$ -	
8	1440 Site Acquisition	\$ -	\$ -	\$ -	\$ -	\$ -	
9	1450 Site Improvement	\$ 671,004	\$ 129,377	\$ 129,377	\$ 129,377	\$ 116,439	
10	1460 Dwelling Structures	\$ 733,835	\$ 1,279,665	\$ 1,279,665	\$ 1,279,665	\$ 1,226,336	
11	1465.1 Dwelling Equipment—Nonexpendable	\$ -	\$ -	\$ -	\$ -	\$ -	
12	1470 Non-dwelling Structures	\$ 1,111,082	\$ 1,239,296	\$ 1,239,296	\$ 1,239,296	\$ 1,109,602	
13	1475 Non-dwelling Equipment	\$ -	\$ -	\$ -	\$ -	\$ -	
14	1485 Demolition	\$ -	\$ -	\$ -	\$ -	\$ -	
15	1492 Moving to Work Demonstration	\$ -	\$ -	\$ -	\$ -	\$ -	
16	1495.1 Relocation Costs	\$ -	\$ -	\$ -	\$ -	\$ -	
17	1499 Development Activities ⁴	\$ -	\$ -	\$ -	\$ -	\$ -	
18a	1501 Collateralization or Debt Service paid by the PHA	\$ -	\$ -	\$ -	\$ -	\$ -	
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment	\$ -	\$ -	\$ -	\$ -	\$ -	
19	1502 Contingency (may not exceed 8% of line 20)	\$ -	\$ -	\$ -	\$ -	\$ -	
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$ 2,780,755	\$ 2,780,755	\$ 2,780,755	\$ 2,780,755	\$ 2,579,003	
21	Amount of line 20 Related to LBP Activities	\$ 52,500	\$ 52,500	\$ 52,500	\$ 52,500	\$ -	
22	Amount of line 20 Related to Section 504 Activities	\$ 1,440,700	\$ 1,440,700	\$ 1,440,700	\$ 1,440,700	\$ 2,579,003	
23	Amount of line 20 Related to Security - Soft Costs	\$ -	\$ -	\$ -	\$ -	\$ -	
24	Amount of line 20 Related to Security - Hard Costs	\$ -	\$ -	\$ -	\$ -	\$ -	
25	Amount of line 20 Related to Energy Conservation Measures	\$ 382,983	\$ 382,983	\$ 382,983	\$ 382,983	\$ -	

Signature of Executive Director: **Henry A. Alvarez III, Executive Director**

Date: **5/23/2012**

Signature of Public Housing Director: _____

Date: _____

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHF funds shall be included here.

Part III: Implementation Schedule									
PHA Name:		Grant Type and Number				Federal FY of Grant:			
SAN FRANCISCO HOUSING AUTHORITY		Replacement Housing Factor No: CA00100095709E				CFP 2009 (CFRC)			
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹				
	Original	Actual	Original	Actual					
AMP 957 Rosa Parks (part of Robert B. Pitts)	9/27/2010	8/16/2010	9/27/2012	8/12/2011	WORK COMPLETED BY FORCE ACCOUNT				
Category 1, Activity 3 Non-Dwelling Areas Accessibility & Site	9/27/2010	8/16/2010	9/27/2012		WORK IN PROGRESS				
Category 1, Activity 4 Senior Center Rehabilitation and ADA Upgrades	9/27/2010	8/16/2010	9/27/2012		WORK IN PROGRESS				
Administration (6% of total Grant)	9/27/2010	8/16/2010	9/27/2012		WORK IN PROGRESS				
Fees and Costs	9/27/2010	8/16/2010	9/27/2012		REPROGRAMMED				

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9) of the U.S. Housing Act of 1937, as amended.

Attachment VI

Capital Fund Program

Five Year Action Plan



2012 CAPITAL FUND PROGRAM
ANNUAL SUBMISSION

2012 AMENDED FIVE-YEAR ACTION PLAN

Capital Fund Program—Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 4/30/2011

Part I: Summary						
PHA Name/Number San Francisco Housing Authority - CA001		Locality (City/County & State) San Francisco, CA			<input checked="" type="checkbox"/> Original 5-Year Plan	<input type="checkbox"/> Revision No:
A.	Development Number and Name	Work Statement for Year 1 FFY 2012	Work Statement for Year 2 FFY 2013	Work Statement for Year 3 FFY 2014	Work Statement for Year 4 FFY 2015	Work Statement for Year 5 FFY 2016
B.	Physical Improvements Subtotal	\$5,500,000	\$14,175,000	\$10,221,300	\$8,370,000	\$10,790,000
C.	Management Improvements	\$1,000,000	\$2,200,000	\$2,200,000	\$2,200,000	\$2,200,000
D.	PHA-Wide Non-dwelling Structures and Equipment		\$100,000	\$100,000	\$100,000	\$100,000
E.	Administration		\$1,300,000	\$1,300,000	\$1,300,000	\$1,300,000
F.	Other (Fees & Costs)		\$1,000,000	\$1,000,000	\$1,000,000	\$1,000,000
G.	Operations		\$2,600,000	\$2,600,000	\$2,600,000	\$2,600,000
H.	Demolition					
I.	Development		\$50,000	\$50,000	\$50,000	\$50,000
J.	Capital Fund Financing – Debt Service		\$1,000,000	\$1,000,000	\$1,000,000	\$1,000,000
K.	Total CFP Funds		\$22,425,000	\$18,471,300	\$16,620,000	\$19,040,000
L.	Total Non-CFP Funds					
M.	Grand Total		\$22,425,000	\$18,471,300	\$16,620,000	\$19,040,000

Capital Fund Program—Five-Year Action Plan

Part I: Summary					
PHA Name/Number San Francisco Housing Authority - CA001		Locality (City/County & State) San Francisco, CA		<input checked="" type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revision No:	
Development Number and Name	Work Statement for Year 1 FFY 2012	Work Statement for Year 2 FFY 2013	Work Statement for Year 3 FFY 2014	Work Statement for Year 4 FFY 2015	Work Statement for Year 5 FFY 2016
966	CAL 1-1, Holly Courts	\$400,000	\$400,000	\$400,000	\$400,000
966	CAL 1-16, Alemany	\$200,000	\$150,000	\$150,000	\$100,000
967	CAL 1-2 Potrero Terrace	\$0	\$300,000	\$300,000	\$250,000
968	CAL 1-3, Sunnydale	\$200,000	\$200,000	\$200,000	\$200,000
968	CAL 1-18 (7), Hayes Valley, Velasco	\$0	\$0	\$0	\$0
969	CAL 1-8, Westside Courts	\$250,000	\$150,000	\$300,000	\$300,000
970	CAL 1-9, Westbrook	\$250,000	\$200,000	\$100,000	\$120,000
971	CAL 1-10, Potrero Annex	\$225,000	\$200,000	\$150,000	\$100,000
972	CAL 1-15, Ping Yuen	\$2,580,000	\$1,666,300	\$600,000	\$700,000
972	CAL 1-36, 227 Bay Street	\$75,000	\$75,000	\$0	\$0
973	CAL 1-17A, Hunters' Point	\$500,000	\$100,000	\$175,000	\$3,350,000
974	CAL 1-18(3) Hunters' View	\$50,000	\$100,000	\$50,000	\$0
975	CAL 1-18(4) Alice Griffith	\$100,000	\$150,000	\$150,000	\$550,000
976	CAL 1-18 (6), Ping Yuen North	\$2,790,000	\$500,000	\$2,180,000	\$650,000
976	CAL 1-19 (1), 990 Pacific Ave.	\$400,000	\$500,000	\$250,000	\$150,000
977	CAL 1-23, 1890 Pine St.	\$20,000	\$130,000	\$250,000	\$150,000
977	CAL 1-32, 1760 Bush St.	\$250,000	\$0	\$400,000	\$100,000
978	CAL 1-18(5) Rosa Parks	\$550,000	\$250,000	\$0	\$0
978	CAL 1-42, San Jule Apts.	\$0	\$0	\$0	\$0
979	CAL 1-18 (10), Woodside Gardens	\$0	\$130,000	\$0	\$0
980	CAL 1-18 (13), Mission Dolores	\$130,000	\$250,000	\$0	\$0
980	CAL 1-34, 363 Noe St.	\$170,000	\$130,000	\$130,000	\$10,000
981	CAL 1-27, 350 Ellis St	\$130,000	\$130,000	\$250,000	\$75,000
981	CAL 1-28, 666 Ellis St	\$130,000	\$0	\$250,000	\$0
982	CAL 1-20, 3850 18th St.	\$130,000	\$2,000,000	\$130,000	\$60,000
982	CAL 1-30C, 101-03 Lundy Lane	\$0	\$0	\$400,000	\$0
983	CAL 1-21, 320/330 Clementina St.	\$2,000,000	\$200,000	\$250,000	\$400,000
984	CAL 1-18(1), JFK Towers	\$300,000	\$120,000	\$0	\$0
984	CAL 1-35, 2698 California Street	\$300,000	\$400,000	\$150,000	\$170,000
985	CAL 1-19 (2), 1750 McAllister St.	\$320,000	\$0	\$0	\$200,000
985	CAL 1-34, 200 Randolph Street	\$0	\$0	\$0	\$0
985	CAL 1-34, 4101 Noriega Street	\$150,000	\$0	\$140,000	\$0
985	CAL 1-34, Great Highway	\$0	\$75,000	\$0	\$0
986	CAL 1-29, 345 Arguello St.	\$0	\$100,000	\$60,000	\$0
986	CAL 1-30A, 462 Duboce St.	\$150,000	\$130,000	\$130,000	\$500,000
986	CAL 1-31, 25 Sanchez St.	\$0	\$190,000	\$0	\$250,000
986	CAL 1-37, 491 31st Ave.	\$250,000	\$150,000	\$0	\$220,000
987	CAL 1-39A, 939 Eddy St.	\$50,000	\$150,000	\$50,000	\$320,000
987	CAL 1-39B, 951 Eddy St.	\$0	\$0	\$0	\$240,000
987	CAL 1-41, 430 Turk St.	\$100,000	\$270,000	\$200,000	\$350,000
988	CAL 1-43, Robert B. Pitts	\$0	\$0	\$0	\$0

Part II: Supporting Pages - Physical Needs Work Statement(s)

Work Statement for Year 1 FFY 2012	Work Statement for Year 2 FFY 2013		Work Statement for Year 3 FFY 2014			
	Development Number/Name/General Description of Major Work Category	Quantity	Estimated Costs	Development Number/Name/General Description of Major Work Category	Quantity	Estimated Costs
See Annual Statement	CAL 1-1, Holly Courts Interior Unit Rehabilitation (Phase I) FA	100%	\$400,000	CAL 1-1, Holly Courts Interior Unit Rehabilitation (Phase II) FA	100%	\$400,000
	CAL 1-16, Alemany Kitchen sink and countertop replacement (Phase I) FA	100%	\$200,000	CAL 1-16, Alemany Kitchen sink and countertop replacement (Phase II) FA	100%	\$50,000
				Plumbing improvements (Phase I)	100%	\$50,000
				Electrical improvements (Phase I)	100%	\$50,000
	CAL 1-2 Potrero Terrace			CAL 1-2 Potrero Terrace Site Electrical Improvements (Phase I)	100%	\$100,000
				Concrete work to walkways/sidewalks	100%	\$50,000
				Plumbing improvements (Phase I)	100%	\$150,000
	CAL 1-3, Sunnydale			CAL 1-3, Sunnydale Plumbing improvements (Phase I)	100%	\$100,000
				Electrical improvements (Phase I)	100%	\$100,000
	CAL 1-18 (7), Hayes Valley, Velasco			CAL 1-18 (7), Hayes Valley, Velasco		
	CAL 1-8, Westside Courts			CAL 1-8, Westside Courts Water main and sewer improvements (Phase I)	100%	\$250,000
				Water main and sewer improvements (Phase II)	100%	\$150,000
	CAL 1-9, Westbrook			CAL 1-9, Westbrook Bathrooms repairs/improvements (Phase I)	100%	\$150,000
				Plumbing improvements (Phase I)	100%	\$50,000
				Electrical improvements (Phase I)	100%	\$50,000
	CAL 1-10, Potrero Annex			CAL 1-10, Potrero Annex New Boiler and Plumbing Improvements (Phase I)	100%	\$150,000
				Electrical improvements (Phase I)	100%	\$75,000
	CAL 1-15, Ping Yuen			CAL 1-15, Ping Yuen Water Distribution Line Replacement		\$2,340,000
				Roofing repairs	100%	\$240,000
	CAL 1-36, 227 Bay Street			CAL 1-36, 227 Bay Street Replace Main Entry	100%	\$75,000
	CAL 1-17A, Hunters' Point			CAL 1-17A, Hunters' Point Plumbing improvements (Phase I)	100%	\$250,000
				Electrical improvements (Phase I)	100%	\$250,000
				New mailboxes at high-rise		\$25,000

Work Statement for Year 1 FFY 2012	Part II: Supporting Pages - Physical Needs Work Statement(s)				Quantity	Estimated Costs	Development Number/Name/General Description of Major Work Category	Quantity	Estimated Costs
	Work Statement for Year 2 FFY 2013	Work Statement for Year 3 FFY 2014	Work Statement for Year 4 FFY 2015	Work Statement for Year 5 FFY 2016					
	CAL 1-18(3) Hunters' View PGE Meter Door Replacement		CAL 1-18(3) Hunters' View Gutter and Downspout Replacement	100%	\$50,000		100%	\$100,000	
	CAL 1-18(4) Alice Griffith Erosion Stabilization		CAL 1-18(4) Alice Griffith Plumbing improvements (Phase I) Electrical improvements (Phase I)	100%	\$100,000		100%	\$75,000 \$75,000	
	CAL 1-18 (6), Ping Yuen North Water Distribution Line Replacement Central Vent And Exhaust (11-16 Stories)		CAL 1-18 (6), Ping Yuen North Boiler Replacement Replace chain link fence with matching red iron-rod fence	100%	\$1,940,000 \$850,000		100%	\$300,000 \$200,000	
	CAL 1-19 (1), 990 Pacific Ave. Exterior Painting Roofing replacement		CAL 1-19 (1), 990 Pacific Ave. Exhaust Fan Replacement Rehabilitate Garbage Room	100%	\$150,000 \$250,000		100%	\$100,000 \$100,000	
	CAL 1-32, 1760 Bush St. Upgrade ventilation system		CAL 1-32, 1760 Bush St.	100%	\$250,000				
	CAL 1-23, 1880 Pine St. Paving improvements/site work		CAL 1-23, 1880 Pine St. Ventilation system	100%	\$20,000		100%	\$130,000	
	CAL 1-18(5) Rosa Parks Elevators rehabilitation Roofing		CAL 1-18(5) Rosa Parks Ventilation System	100%	\$300,000 \$250,000		100%	\$250,000	
	CAL 1-42, San Jule Apts.		CAL 1-42, San Jule Apts.						
	CAL 1-18 (10), Woodside Gardens		CAL 1-18 (10), Woodside Gardens Ventilation System				100%	\$130,000	
	CAL 1-18 (13), Mission Dolores Fire alarm system		CAL 1-18 (13), Mission Dolores Ventilation System	100%	\$130,000		100%	\$250,000	
	CAL 1-34, 363 Noe St. Waterproofing Hydronic radiation rehabilitation		CAL 1-34, 363 Noe St. Window improvements	100%	\$70,000 \$100,000		100%	\$130,000	
	CAL 1-27, 350 Ellis St Elevators rehabilitation		CAL 1-27, 350 Ellis St Fire alarm system	100%	\$130,000		100%	\$130,000	
	CAL 1-28, 666 Ellis St Fire alarm system		CAL 1-28, 666 Ellis St	100%	\$130,000				

Work Statement for Year 1 FFY 2012	Work Statement for Year 2 FFY 2013			Work Statement for Year 3 FFY 2014		
	Development Number/Name/General Description of Major Work Category	Quantity	Estimated Costs	Development Number/Name/General Description of Major Work Category	Quantity	Estimated Costs
	CAL 1-20, 3850 18th St. Ventilation System	100%	\$130,000	CAL 1-20, 3850 18th St. Window Replacement	100%	\$2,000,000
	CAL 1-30C, 101-03 Lundys Lane			CAL 1-30C, 101-03 Lundys Lane		
	CAL 1-21, 320/330 Clementina St. Window Replacement and Screen Door Installation	100%	\$2,000,000	CAL 1-21, 320/330 Clementina St. Kitchen Cabinet Improvement	100%	\$200,000
See Annual Statement	CAL 1-18(1), JFK Towers Fire Alarm System Replacement	100%	\$300,000	CAL 1-18(1), JFK Towers Exhaust Fan Replacement	100%	\$120,000
	CAL 1-35, 2698 California Street Fire Alarm System Improvements	100%	\$300,000	CAL 1-35, 2698 California Street Ventilation System	100%	\$400,000
	CAL 1-19 (2), 1750 McAllister St. Elevators rehabilitation	100%	\$320,000	CAL 1-19 (2), 1750 McAllister St.		
	CAL 1-34, 4101 Noriega Street Exterior painting	100%	\$150,000	CAL 1-34, 4101 Noriega Street		
	CAL 1-34, Great Highway			CAL 1-34, Great Highway Replace 16 Patio doors and frames	100%	\$75,000
	CAL 1-34, 200 Randolph Street			CAL 1-34, 200 Randolph Street		
	CAL 1-30A, 462 Duboce St. Exterior painting	100%	\$150,000	CAL 1-30A, 462 Duboce St. Fire alarm system		\$130,000
	CAL 1-29, 345 Arguello St.			CAL 1-29, 345 Arguello St. Heat exchange tank installation		\$100,000
	CAL 1-31, 25 Sanchez St.			CAL 1-31, 25 Sanchez St. Elevators rehabilitation		\$190,000
	CAL 1-37, 491 31st Ave. Boiler Replacement	100%	\$250,000	CAL 1-37, 491 31st Ave. Stove and hood rehabilitation		\$150,000
	CAL 1-39A, 939 Eddy St. Upgrade Trash Disposal	100%	\$50,000	CAL 1-39A, 939 Eddy St. Upgrade Heating System		\$150,000
	CAL 1-39B, 951 Eddy St.			CAL 1-39B, 951 Eddy St.		

Part II: Supporting Pages - Physical Needs Work Statement(s)		Work Statement for Year 4 FFY 2015		Work Statement for Year 5 FFY 2016	
Development Number/Name/General Description of Major Work Category	Quantity	Estimated Costs	Development Number/Name/General Description of Major Work Category	Quantity	Estimated Costs
CAL 1-1, Holly Courts	100%	\$400,000	CAL 1-1, Holly Courts	100%	\$400,000
Interior Unit Rehabilitation (Phase III) FA			Interior Unit Rehabilitation (Phase IV) FA		
CAL 1-16, Alemany	100%	\$50,000	CAL 1-16, Alemany	100%	\$50,000
Plumbing improvements (Phase II)			Plumbing improvements (Phase III)		
Electrical improvements (Phase II)	100%	\$50,000	Electrical improvements (Phase III)	100%	\$50,000
CAL 1-2 Potrero Terrace	100%	\$150,000	CAL 1-2 Potrero Terrace	100%	\$250,000
Plumbing improvements (Phase II)			Erosion Stabilization		
CAL 1-3, Sunnydale	100%	\$100,000	CAL 1-3, Sunnydale	100%	\$100,000
Plumbing improvements (Phase III)			Plumbing improvements (Phase IV)		
Electrical improvements (Phase III)	100%	\$100,000	Electrical improvements (Phase IV)	100%	\$100,000
CAL 1-18 (7), Hayes Valley, Velasco			CAL 1-18 (7), Hayes Valley, Velasco		
CAL 1-8, Westside Courts	100%	\$50,000	CAL 1-8, Westside Courts	100%	\$250,000
Plumbing improvements (Phase I)			Kitchen Upgrades		
Bathroom Upgrades	100%	\$250,000	Electrical improvements (Phase I)	100%	\$50,000
CAL 1-9, Westbrook	100%	\$50,000	CAL 1-9, Westbrook	100%	\$50,000
Plumbing improvements (Phase II)			Plumbing improvements (Phase III)		
Electrical improvements (Phase II)	100%	\$50,000	Handrail and Fences Improvements	100%	\$70,000
CAL 1-10, Potrero Annex	100%	\$75,000	CAL 1-10, Potrero Annex	100%	\$50,000
Plumbing improvements (Phase III)			Plumbing improvements (Phase IV)		
Electrical improvements (Phase III)	100%	\$75,000	Electrical improvements (Phase IV)	100%	\$50,000
CAL 1-15, Ping Yuen	100%	\$250,000	CAL 1-15, Ping Yuen	100%	\$200,000
Telephone/Cable Tv Distribution Upgrade			Door Replacement at Stairwell		
Replace Waste Piping Underneath Building	100%	\$200,000	All Exit Doors Replacement	100%	\$50,000
Boiler Replacement	100%	\$150,000	Existing Elevator Upgrades	100%	\$450,000
CAL 1-36, 227 Bay Street			CAL 1-36, 227 Bay Street		
CAL 1-17A, Hunters' Point	100%	\$75,000	CAL 1-17A, Hunters' Point	100%	\$2,500,000
Plumbing improvements (Phase II)			Window Replacement		
Sewer Improvements	100%	\$100,000	Concrete walkways, retaining walls and landscape improvements	100%	\$850,000
CAL 1-18(3) Hunters' View	100%	\$50,000	CAL 1-18(3) Hunters' View		
Sidewalk car barrier installation					

Part II: Supporting Pages - Physical Needs Work Statement(s)		Work Statement for Year 4 FFY 2015		Work Statement for Year 5 FFY 2016	
Development Number/Name/General Description of Major Work Category	Quantity	Estimated Costs	Development Number/Name/General Description of Major Work Category	Quantity	Estimated Costs
CAL 1-18(4) Alice Griffith			CAL 1-18(4) Alice Griffith		
Plumbing Improvements (Phase II)	100%	\$75,000	Heating and Water Systems Upgrades	100%	\$500,000
Electrical Improvements (Phase II)	100%	\$75,000	Speed Bump Installation	100%	\$50,000
CAL 1-18 (6), Ping Yuen North			CAL 1-18 (6), Ping Yuen North		
Window Replacement	100%	\$2,000,000	Elevator Upgrades	100%	\$500,000
Shade/Blind Replacement	100%	\$180,000	Surveillance Cameras At Elevators And Laundry Rooms	100%	\$150,000
CAL 1-19 (1), 990 Pacific Ave.			CAL 1-19 (1), 990 Pacific Ave.		
Boiler Replacement	100%	\$250,000	Range and Cabinet Replacement	100%	\$150,000
CAL 1-32, 1760 Bush St.			CAL 1-32, 1760 Bush St.		
Elevator Upgrades	100%	\$400,000	Plumbing improvements	100%	\$100,000
CAL 1-23, 1880 Pine St.			CAL 1-23, 1880 Pine St.		
CAL 1-18(5) Rosa Parks			CAL 1-18(5) Rosa Parks		
CAL 1-42, San Jule Apts.			CAL 1-42, San Jule Apts.		
CAL 1-18 (10), Woodside Gardens			CAL 1-18 (10), Woodside Gardens		
CAL 1-18 (13), Mission Dolores			CAL 1-18 (13), Mission Dolores		
CAL 1-34, 363 Noe St.			CAL 1-34, 363 Noe St.		
Ventilation System	100%	\$130,000	Plumbing Upgrades	100%	\$10,000
CAL 1-27, 350 Ellis St			CAL 1-27, 350 Ellis St		
Boiler Replacement	100%	\$250,000	Garbage Chute Modification	100%	\$75,000
CAL 1-28, 666 Ellis St			CAL 1-28, 666 Ellis St		
Boiler Replacement	100%	\$250,000			
CAL 1-20, 3850 18th St.			CAL 1-20, 3850 18th St.		
Fire alarm system	100%	\$130,000	Mailbox Replacement	100%	\$60,000
CAL 1-30C, 101-03 Lundys Lane			CAL 1-30C, 101-03 Lundys Lane		
Comprehensive Rehabilitation	100%	\$400,000			
CAL 1-21, 320/330 Clementina St.			CAL 1-21, 320/330 Clementina St.		
Ventilation System	100%	\$250,000	Elevators rehabilitation	100%	\$400,000

Part II: Supporting Pages - Physical Needs Work Statement(s)		Work Statement for Year 4 FFY 2015		Work Statement for Year 5 FFY 2016	
Development Number/Name/General Description of Major Work Category	Quantity	Estimated Costs	Development Number/Name/General Description of Major Work Category	Quantity	Estimated Costs
CAL 1-18(1), JFK Towers			CAL 1-18(1), JFK Towers		
CAL 1-35, 2698 California Street Exterior Weatherization	100%	\$150,000	CAL 1-35, 2698 California Street Plumbing Upgrades	100%	\$170,000
CAL 1-19 (2), 1750 McAllister St.			CAL 1-19 (2), 1750 McAllister St. Plumbing/Heating Improvements		\$200,000
CAL 1-34, 4101 Noriega Street Electrical Upgrades	100%	\$80,000	CAL 1-34, 4101 Noriega Street		
Plumbing Upgrades	100%	\$60,000			
CAL 1-34, Great Highway			CAL 1-34, Great Highway		
CAL 1-34, 200 Randolph Street			CAL 1-34, 200 Randolph Street		
CAL 1-30A, 462 Duboce St. Ventilation System	100%	\$130,000	CAL 1-30A, 462 Duboce St. Boiler Replacement	100%	\$250,000
			Plumbing/Heating Improvements	100%	\$250,000
CAL 1-29, 345 Arguello St. Common Areas Carpeting	100%	\$60,000	CAL 1-29, 345 Arguello St.		
CAL 1-31, 25 Sanchez St.			CAL 1-31, 25 Sanchez St. Boiler Replacement		
CAL 1-37, 491 31st Ave.			CAL 1-37, 491 31st Ave. Ventilation System		
			Common Areas Carpeting		
CAL 1-39A, 939 Eddy St. Exterior paint and pidgeon control	100%	\$50,000	CAL 1-39A, 939 Eddy St. Boiler Replacement	100%	\$280,000
CAL 1-39B, 951 Eddy St.			Common Areas Carpeting	100%	\$40,000
			CAL 1-39B, 951 Eddy St. Ventilation System		
			Common Areas Carpeting		
CAL 1-41, 430 Turk St. Boiler Replacement	100%	\$200,000	CAL 1-41, 430 Turk St. Elevators rehabilitation	100%	\$350,000
CAL 1-43, Robert B. Pitts			CAL 1-43, Robert B. Pitts		

Capital Fund Program—Five-Year Action Plan

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Part II: Supporting Pages - Management Needs Work Statement(s)			
Work Statement	Work Statement for Year 2 2013	Work Statement for Year 3 2014	
for Year 1 FFY 2012	Development Number/Name/General Description of Major Work Category	Development Number/Name/General Description of Major Work Category	Estimated Costs
See Annual Statement	Improve Security Software and Implementation MS Licensing	Improve Security Software and Implementation MS Licensing	\$2,000,000 \$110,000 \$90,000
			\$2,000,000 \$110,000 \$90,000
	Subtotal of Estimated Cost	Subtotal of Estimated Cost	\$2,200,000
	Subtotal of Estimated Cost	Subtotal of Estimated Cost	\$2,200,000

Part II: Supporting Pages - Management Needs Work Statement(s)			
Work Statement	Work Statement for Year 4 2015	Work Statement for Year 5 2016	
	Development Number/Name/General Description of Major Work Category	Development Number/Name/General Description of Major Work Category	Estimated Costs
for Year 1 FFY 2012	Improve Security Software and Implementation MS Licensing	Improve Security Software and Implementation MS Licensing	\$2,000,000 \$110,000 \$90,000
See Annual Statement			\$2,000,000 \$110,000 \$90,000
	Subtotal of Estimated Cost	Subtotal of Estimated Cost	\$2,200,000
			\$2,200,000



Attachment VII

Required Submissions

**PHA Certifications of Compliance with the PHA Plans and Related Regulations:
Board Resolution to Accompany the PHA 5-Year and Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year and/or Annual PHA Plan for the PHA fiscal year beginning 10-01-2012 hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA certifies that there has been no change, significant or otherwise, to the Capital Fund Program (and Capital Fund Program/Replacement Housing Factor) Annual Statement(s), since submission of its last approved Annual Plan. The Capital Fund Program Annual Statement/Annual Statement/Performance and Evaluation Report must be submitted annually even if there is no change.
4. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
7. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. For PHA Plan that includes a policy for site based waiting lists:
 - o The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2006-24);
 - o The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - o Adoption of site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - o The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing;
 - o The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
11. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

12. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
13. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
14. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
15. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
16. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
17. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
18. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
19. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
20. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
21. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
22. The PHA certifies that it is in compliance with all applicable Federal statutory and regulatory requirements.

San Francisco Housing Authority

CA001

PHA Name

PHA Number/HA Code

5-Year PHA Plan for Fiscal Years 20 - 20

Annual PHA Plan for Fiscal Years 20 12 - 20 13

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

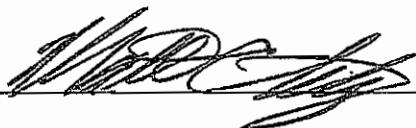
Name of Authorized Official

Matthew Schwartz

Title

Commissioner

Signature



Date

07-12-2012

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

Approved by OMB

0348-0046

(See reverse for public burden disclosure.)

1. Type of Federal Action: <input checked="checked" type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. Status of Federal Action: <input checked="checked" type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. Report Type: <input checked="checked" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____
4. Name and Address of Reporting Entity: <input checked="checked" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Congressional District, if known: 8	5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:	
6. Federal Department/Agency: U. S. Department of Housing and Urban Development	7. Federal Program Name/Description: 2012 Capital Fund Program (CFP) CFDA Number, if applicable: <u>CA39P0015011</u>	
8. Federal Action Number, if known:	9. Award Amount, if known: \$ 11,061,806	
10. a. Name and Address of Lobbying Registrant <i>(if individual, last name, first name, MI):</i>	b. Individuals Performing Services <i>(including address if different from No. 10a)</i> <i>(last name, first name, MI):</i>	
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	Signature: _____ Print Name: <u>Henry A. Alvarez III</u> Title: <u>Executive Director</u> Telephone No.: <u>415-715-3122</u> Date: <u>07/15/12</u>	
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

Certification for a Drug-Free Workplace

U.S. Department of Housing and Urban Development

Applicant Name

San Francisco Housing Authority

Program/Activity Receiving Federal Grant Funding

Capital Fund Program Grant

Acting on behalf of the above named Applicant as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding the sites listed below:

I certify that the above named Applicant will or will continue to provide a drug-free workplace by:

a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

b. Establishing an on-going drug-free awareness program to inform employees ---

(1) The dangers of drug abuse in the workplace;

(2) The Applicant's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;

d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will ---

(1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

2. **Sites for Work Performance.** The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above: Place of Performance shall include the street address, city, county, State, and zip code. Identify each sheet with the Applicant name and address and the program/activity receiving grant funding.)

See Attachment.

Check here if there are workplaces on file that are not identified on the attached sheets.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties.
(18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official
Henry A. Alvarez, III

Title
Executive Director

Signature

Date

X

07-09-2012

- 2. Sites for Work Performance.** The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above: Place of Performance shall include the street address, city, county, State and zip code. Identify each sheet with the HA name and address and the program/activity receiving grant funding.)
- | | | |
|---|---|---|
| 1. CAL 1-1, HOLLY COURTS
100 Appleton Street
San Francisco, CA 94110 | 14. CAL 1-18(5), ROSA PARKS
1251 Turk Street
San Francisco, CA 94115 | 29. CAL 1-31, 25 SANCHEZ STREET
San Francisco, CA 94114 |
| 2. CAL 1-2, POTRERO TERRACE
1095 Connecticut Street
San Francisco, CA 94107 | 15. CAL 1-18(6), PING YUEN NORTH
838 Pacific Avenue
San Francisco, CA 94133 | 30. CAL 1-32, 1760 BUSH STREET
San Francisco, CA 94109 |
| 3. CAL 1-3, SUNNYDALE
1654 Sunnydale Avenue
San Francisco, CA 94134 | 16. CAL 1-18(7), HAYES VALLEY A,
Velasco
1654 Sunnydale Avenue
San Francisco, CA 94134 | 31. CAL 1-33, 275 THRIFT STREET
San Francisco, CA 94112 |
| 4. CAL 1-8, WESTSIDE COURTS
2501 Sutter Street
San Francisco, CA 94115 | 17. CAL 1-18(10), WOODSIDE GARDENS
255 Woodside Avenue
San Francisco, CA 94127 | 32. CAL 1-34, 4101 NORIEGA STREET
San Francisco, CA 94122 |
| 5. CAL 1-9, WESTBROOK
90 Kiska Road
San Francisco, CA 94124 | 18. CAL 1-18(13), MISSION DOLORES
1855 15 TH Street
San Francisco, CA 94103 | 33. CAL 1-34, 363 NOE STREET
San Francisco, CA 94114 |
| 6. CAL 1-10, POTRERO ANNEX
1095 Connecticut Street
San Francisco, CA 94107 | 19. CAL 1-19(1), 990 PACIFIC AVE.
San Francisco, CA 94133 | 34. CAL 1-34, 200 RANDOLPH
STREET
San Francisco, CA 94132 |
| 7. CAL 1-15, PING YUEN
799 Pacific Avenue
San Francisco, CA 94133 | 20. CAL 1-19(2), 1750 Mc ALLISTER
STREET
San Francisco, CA 94115 | 35. CAL 1-35, 2206-68 GREAT
HIGHWAY
San Francisco, CA 94116 |
| 8. CAL 1-16, ALEMANY
937 Ellsworth Street
San Francisco, CA 94110 | 21. CAL 1-20, 3850 18TH STREET
San Francisco, CA 94114 | 36. CAL 1-35, 2698 CALIFORNIA
STREET
San Francisco, CA 94115 |
| 9. CAL 1-17A, HUNTER'S POINT -A-
EAST
1137 Oakdale Ave
San Francisco, CA 94124 | 22. CAL 1-21, CLEMENTINA Towers
320/330 Clementina Street
San Francisco, CA 94103 | 37. CAL 1-36, 227 BAY STREET
San Francisco, CA 94133 |
| 10. CAL 1-17A, HUNTER'S POINT -A-
WEST
1137 Oakdale Ave.
San Francisco, CA 94124 | 23. CAL 1-23, 1880 PINE STREET
San Francisco, CA 94109 | 38. CAL 1-37, 491 31ST AVENUE
San Francisco, CA 94121 |
| 11. CAL 1-18(1), JFK TOWERS
2451 Sacramento Street
San Francisco, CA 94115 | 24. CAL 1-27, 350 ELLIS STREET
San Francisco, CA 94102 | 39. CAL 1-39A, 939 EDDY STREET
San Francisco, CA 94109 |
| 12. CAL 1-18(3), HUNTER'S VIEW
227/229 Westpoint Road
San Francisco, CA 94124 | 25. CAL 1-28, 666 ELLIS STREET
San Francisco, CA 94102 | 40. CAL 1-39B, 951 EDDY STREET
San Francisco, CA 94109 |
| 13. CAL 1-18(4), ALICE GRIFFITH
207 Cameron Way
San Francisco, CA 94124 | 26. CAL 1-29, 345 ARGUELLO BLVD.
San Francisco, CA 94118 | 41. CAL 1-41, 430 TURK STREET
San Francisco, CA 94102 |
| | 27. CAL 1-30A, 462 DUBOCE STREET
San Francisco, CA 94114 | 42. CAL 1-42, JOAN SAN JULE APTS.
1353-67 Eddy Street
San Francisco, CA 94115 |
| | 28. CAL 1-30C, 101-103 LUNDY'S LANE
San Francisco, CA 94110 | 43. CAL 1-43, ROBERT B. PITTS PLAZA
1150 Scott Street
San Francisco, CA 94115 |

I hereby certify that all the information stated herein as well as any information provided in the accompaniment herewith is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name & Title of Authorized HA Official
Henry A. Alvarez, III, Executive Director

Date: 07/15/12

X Signature

**Certification of Payments
to Influence Federal Transactions**

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

OMB Approval No. 2577-0157 (Exp. 01/31/2014)

Applicant Name

San Francisco Housing Authority

Program/Activity Receiving Federal Grant Funding

Capital Fund Grant Program

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

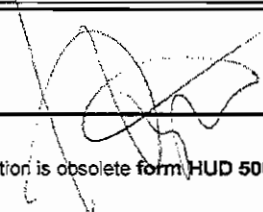
Name of Authorized Official

Henry A. Alvarez, III

Title

Executive Director

Signature



Date (mm/dd/yyyy)

07-09-2012

Previous edition is obsolete form HUD 50071 (3/98)

ref. Handbooks 7417.1, 7475.13, 7485.1, & 7485.3

Attachment VIII

Resident Advisory Board Comments



AGENCY PLAN RESPONSE TO COMMENTS AND QUESTIONS RECEIVED **NOTICE TO RESIDENTS AND PROGRAM PARTICIPANTS**

The San Francisco Housing Authority (SFHA) is pleased to respond to comments and questions received on SFHA's Fiscal Year 2012 Draft Agency Plan. The Agency Plan Resident Advisory Boards, Housing Choice Voucher program participants, Public Housing residents and interested parties have participated in the Agency Plan process. The SFHA is committed to responding and addressing all the issues raised by these comments. Copies of these responses will be available at our central office and will also be made available to interested parties and members of the public who request them. The Agency Plan of which this document is part of is available at www.sfha.org.

I. BACKGROUND

The "Quality Housing Work Responsibility Act of 1998" (QHWRA) contains a provision whereby the Public Housing Agency (PHA) must submit an Agency Plan. The Department of Housing and Urban Development (HUD) published the Agency Plan final rule on October 21, 1998. The rule took effect on November 22, 1999.

The Agency Plan has two elements, a Five-Year Plan and an Annual Plan. The Agency Plan submission process is a continuing planning process, tailored after the Consolidated Plan process. The Housing Authority must submit an Annual Plan every year. Residents, program participants, and the public must have an opportunity for input before each submission to HUD.

II. REQUIREMENTS OF THE CODE OF FEDERAL REGULATIONS FOR RESIDENT PARTICIPATION IN THE AGENCY PLAN PROCESS

The Code of Federal Regulations (CFR) provisions are as follows:

- Section 903.13, (a) states: "...The role of the Resident Advisory Board...is to participate in the PHA planning process and to assist and make recommendations regarding the PHA plans."
- Section 903.13, (c) states: "The PHA must consider the recommendations of the Resident Advisory Board or Boards in preparing the final Agency Plan. In submitting the final plan to HUD for approval, the PHA must include a copy of the recommendations made by the Board or Boards and a description of the manner in which the PHA addressed these recommendations."
- Section 903.17 sets forth the public notification requirements: The Board of Commissioners "must conduct a public hearing to discuss the PHA plan...and invite public comment on the plan(s). The hearing must be conducted at a location that is convenient to the residents served by the PHA."

The regulations also state:

“Not later than 45 days before the public hearing is to take place, the PHA must:

- 1) Make the proposed plan(s) and all information relevant to the public hearing to be conducted available for inspection by the public at the principal office of the PHA during normal business hours; and
- 2) Publish a notice informing the public that the information is available for review and inspection, and that a public hearing will take place on the plan, and the date, time, and location of the hearing.”

III. THE HOUSING AUTHORITY AGENCY PLAN PUBLIC PROCESS

The SFHA has made the Agency Plan submission/approval process a public process. The SFHA has a history of going beyond the letter of the law for resident participation requirements. The public process for the Agency Plan began March 1, 2012 and concluded at the July 12, 2012 Public Hearing. The events, communications and activities relevant to the SFHA’s Public Plan process include:

- The SFHA’s Jurisdiction Wide Council formed the Conventional Public Housing Resident Advisory Board (RAB). An advanced schedule of all Annual Plan meetings was provided to the RAB in addition to an informational presentation detailing what the RAB’s role is, and what the Annual Plan Process entails.
- The SFHA sent an application to be on the Resident Advisory Board (RAB) to all 9,300 participants of the Housing Choice Voucher Program. The SFHA received 300 responses. The SFHA randomly selected 30 participants to sit on the Housing Choice Voucher Program RAB. (This number was selected because it is comparable to that of the Conventional Public Housing RAB.) An advanced schedule of all Annual Plan meetings was provided to the RAB in addition to an informational presentation detailing what the RAB’s role is, and what the Annual Plan Process entails.
- The SFHA made the Draft Agency Plan available to any member of the public at www.sfha.org. Hard copies were also available at the Main Branch of the San Francisco Public Library, and at the SFHA’s Central office located at 1815 Egbert Avenue in San Francisco.

- The SFHA provided notice to every Public Housing unit and Housing Choice Voucher Family of the May 31, 2012 Public Meeting. The notice was disseminated in: (1) Spanish; (2) Chinese; (3) Vietnamese; and (4) Russian. The May 31, 2012 Conventional Public Housing Program Public Meeting was attended by approximately 131 individuals. The May 31, 2012 Housing Choice Voucher Program Participant Public Meeting was attended by approximately 600 individuals. The SFHA provided interpreters at both meetings in the following languages: (1) Spanish; (2) Chinese; (3) Vietnamese; and (4) Russian. Additionally, the agenda for the meeting and location of the SFHA's Proposed Plan were made available in English and the above mentioned languages to all individuals in attendance.
- The Housing Authority Board of Commissioners conducted a Public Hearing regarding the Draft Agency Plan on July 12, 2012. The Public Hearing was noticed in various local newspapers as well as on www.sfha.org. The Public Hearing was attended by approximately 150 individuals representing residents, participants, applicants and community stakeholders/partners. The SFHA provided interpreters at the Public Hearing in the following languages: (1) Spanish; (2) Chinese; (3) Vietnamese; and (4) Russian. Everyone in attendance was accommodated and everyone wishing to speak had an opportunity to do so.

The SFHA has more than met the minimum requirements. In 2012, the SFHA hosted various meetings in relation to the Annual Plan that were open to the public. There was an extensive flow of information, and extensive presentation of the information. The SFHA considered public comment, not only from the Resident Advisory Board, but also from other residents, program participants, and interested parties.

IV. COMMENTS ON THE SFHA DRAFT AGENCY PLAN

The 2012 Annual Plan Public Process commenced on March 1, 2012. The comment period began on May 25, 2012. During this time, the SFHA received comments via mail, fax, e-mail and phone.

Written Comments

Written comments on the proposed Agency Plan were received throughout the annual plan process. All written submissions are available for review at www.sfha.org.

Oral Comments

Oral comments related to the Draft Agency Plan were received during the following Agency

Plan-related activities/meetings:

2012 PHA Annual Plan Meetings		
Date	Group	Topic
March 6, 2012	PHA RAB	ACOP: Chapters 1-3
March 6, 2012	HCV RAB	Admin Plan: Chapters 1-2
March 13, 2012	Community Partners	Introduction to the Annual Plan Process
March 20, 2012	PHA RAB	ACOP: Chapters 3-4 (Preference discussion commences); Capital Fund Program Discussion
March 20, 2012	HCV RAB	Admin Plan Chapters 4-5 (Preference discussion commences)
March 20, 2012	Community Partners	ACOP: Chapters 1-5
April 3, 2012	PHA RAB	ACOP: Chapters 5-6 (Preference discussion continues); Capital Fund Program Discussion
April 3, 2012	HCV RAB	Admin Plan: Chapters 6-8 (Preference discussion continues)
April 3, 2012	Community Partners	ACOP: Chapters 6-11
April 17, 2012	PHA RAB	ACOP: Chapters 7-8 (Preference discussion continues)
April 17, 2012	HCV RAB	Admin Plan: Chapters 9-11 (Preference discussion continues)
April 17, 2012	Community Partners	ACOP: Chapters 12-16
April 24, 2012	Community Partners	Admin Plan: Chapters 1-6
May 1, 2012	PHA RAB	ACOP: Chapters 9-11 (Preference discussion continued)
May 1, 2012	HCV RAB	Admin Plan: Chapters 12-14 (Preference discussion continued)
May 1, 2012	Community Partners	Admin Plan: Chapters 8-12
May 8, 2012	Community Partners	Discussion on Preferences
May 15, 2012	PHA RAB	ACOP: Chapters 12-14
May 15, 2012	HCV RAB	Admin Plan: Chapters 15-17
May 15, 2012	Community Partners	Discussion on Preferences
May 22, 2012	PHA RAB	ACOP: Chapters 15-16 (Preference discussion continued)
May 22, 2012	HCV RAB	Admin Plan: PHA and HCV joint group discussion on preferences
May 22, 2012	Community Partners	Discussion on Preferences
May 29, 2012	Community Partners	Admin Plan: Chapters 13-17
June 26, 2012	PHA & HCV RAB	Discussion on Preferences
May 31, 2012	Public Meeting	PHA Annual Plan Proposed Changes
July 12, 2012	Public Hearing	PHA Annual Plan Proposed Changes

Oral comments on the 2012 Draft Agency Plan were noted. Responses to comments related to the Draft Agency Plan, made by the RAB, were provided at subsequent meetings and made available at www.sfha.org.

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A. Public Housing

1. Overview of the Program and Plans

The Resident Advisory Board (RAB) wanted to know how the Code of Federal Regulations (CFR's) is made. In 1935 Congress created the Federal Register, a daily publication of the rules and federal documents produced by the Executive Branch of the federal government and by the agencies. Documents are selected from the Federal Register and arranged in a scheme of fifty titles, some of which are the same as the titles used to organize federal statutes in the U.S. Code. Each title is divided into chapters, parts, and sections. A particular provision can be cited by reference, first to the title and then to the section where it is found.

The RAB wanted to know when the last five year plan was submitted. The last five-year plan was submitted in 2009.

The RAB asked whether it was necessary to have a single preference scheme that would apply to both the Conventional Public Housing and Housing Choice Voucher waitlist. There is no need for one single preference scheme. The SFHA asked the public for suggestions/comments on the SFHA's local preferences.

2. Fair Housing and Equal Opportunity

The RAB asked why annual criminal background checks of adults in a single household were necessary. After reviewing the policy and further conversations with the RAB and community, the SFHA removed this proposal from the proposed policy.

3. Eligibility

The RAB wanted to know what age is a policy specifying when it refers to "Children." When the policy refers to "children" it is referencing those individuals under 18 years of age.

The RAB asked who the contact person is for residents inquiring about vacant units. An Applicant should place all inquiries regarding unit availability with the Eligibility Department.

The RAB commented on criminal background checks. Specifically, what is involved in a criminal background check? Whether there are specific circumstances where a person can be let into public housing with a criminal background? The criminal background check is a nation-wide data search required for each applicant identified by their Date of Birth, Social Security Number, county that individual is residing in and sex-offender background check. All Applicants admitted to the Program are required to have a criminal background check. Results of the Criminal Background check are then reviewed on a case by case basis, the SFHA's policy is applied and, if denied, Applicants still have an opportunity to grieve the denial.

Residents wanted to know if a person is required to disclose information about their criminal past even if it goes further back than five years. The SFHA only looks back five years unless the criminal act is one that has a statutory bar.

The residents also wanted to know if those who are “changing their ways” (getting off of drugs, in rehab, etc.) would still be eligible for public housing. If so, what is the process? An applicant who is “changing their ways” is eligible pursuant to completing the eligibility process, which includes a criminal background check. The applicant may be asked to provide evidence of a pattern of improvement, i.e. letters of recommendation, completion of drug rehab program, etc.

4. *Application Waiting List and Tenant Selection*

The RAB asked for information about the SFHA waitlist. More specifically how many waitlists are there, and how many people are currently on those waitlists. The SFHA has two waitlists for applicants. One waitlist is for the Conventional Public Housing Program and the other waitlist is for the Housing Choice Voucher Program. Currently, there are approximately 27,000 families on the Public Housing waitlist and 11,000 families on the Housing Choice Voucher program waitlist.

The RAB asked what the process is if there is a split in household. Only one family may remain on the waitlist. The parties involved must decide who will have a right to remain on the waitlist.

The RAB asked if an applicant can remain on one waitlist if accepted to another. The SFHA will not remove applicants from both waitlists. The applicant will only be removed from the waitlist in which he/she accepts housing.

The RAB voiced concerns that the SFHA is not providing housing for adults under their parents lease but will provide housing for families in shelters. The SFHA will provide housing for individuals/families on the waitlist as housing becomes available and as the individual reaches the top of the waitlist.

The RAB asked for examples of government displacement. Examples of government displacement include being moved from a unit due to Code Enforcement, Eminent domain, Public Improvements, or Public Development programs.

A member of the Public Housing RAB wanted to know if being homeless is still a preference. On the Conventional Public Housing waiting list, being homeless remains a preference.

5. *Occupancy Standards and Unit Offers*

The RAB took into account that some people who are offered units may not want to live in some areas. This led to a question on how many unit offers are provided before a family is removed from the waitlist. The SFHA's proposed policy will allow for two unit offers prior to being removed from the waitlist.

The RAB asked whether HUD allows the SFHA to keep units vacant. HUD does not allow for vacant units. The SFHA does its best to make sure units are occupied. If units aren't occupied then the SFHA can lose subsidy.

The RAB commented that some people should be able to deny moving into certain areas. During initial intake the San Francisco Housing Authority will work in good-faith to find the most appropriate housing available for the applicant.

The RAB asked what needs to be verified in order to be approved for a reasonable accommodation. The resident may request a reasonable accommodation from the San Francisco Housing Authority. The Resident must provide the name and contact information of the medical practitioner who can verify that the accommodation is needed. The SFHA will then contact the medical practitioner for verification.

Some residents were concerned about the amount a person would have to pay if they are a non-citizen but still live in a unit. If eligible for the Public Housing Program, the "mixed family" would pay according to the makeup of their household. This would be determined on a case by case basis.

The RAB asked what the rights of an individual to a unit are if they pay the rent but are not on the lease. Every individual that moves into a SFHA unit is required to complete the eligibility process prior to moving in. Moreover, the property manager may accept rent from a third party on a tenant's behalf.

The RAB asked what the rights of a Live-in Aide are if the head of household passes away. A Live in Aide has no rights to the unit if the head of household passes away.

6. *Transfer Policy*

Due to the occurrence of violence at certain developments, the RAB asked if gunshots qualify as an emergency transfer under the proposed policy. Pursuant to the proposed policy, individual circumstances will be reviewed on a case by case basis by the Executive Director or his/her designee for applicability.

The RAB asked if transfer requests due to drug problems, vandalism, and verbal abuse be warranted as emergency. Emergency transfers will be reviewed on a case by case basis by the Executive Director or his or her designee for applicability.

The RAB commented that transfers slow the efficiency of the waitlist down because the SFHA uses its resources to continuously rehouse transfers instead of removing applicants from the waitlist. Constant transfers are one factor in the waitlist remaining stagnant.

The RAB asked if asthma would be a sufficient reason to transfer. The SFHA does see asthma as a sufficient reason to transfer.

The RAB asked what the timeframe for a transfer would be under the proposed policy. Transfers would be addressed as the need arises, availability of units exists, and resources allow.

Various comments were received inquiring into what happens to someone requesting a reasonable accommodation as an emergency transfer. Each transfer will be reviewed on a case-by-case basis. If a transfer does not qualify as an emergency transfer, it will be classified a non-emergency transfer.

7. *Lease Terminations*

The RAB asked whether an individual can “house sit” for a resident while he/she is in jail or away for extended leave.. The person who is on the least must notify the property manager that he/she will be away from the unit for an extended amount of time. The unit may not be subsequently occupied by any other person regardless of their relationship to the household member. If a resident suspects this is occurring in their building, they should contact the property manager.

The RAB was concerned about being evicted from the San Francisco Housing Authority and its effect on their credit history. Any eviction will appear on an individual’s credit history for the time period allowed by the law.

8. *Other Comments*

The RAB asked what can be done if they know that fellow residents are overmedicating themselves. The resident should call the local police department and advise their property manager.

B. Housing Choice Voucher

1. Overview of Program and Plan

The RAB asked what the difference is between a tenant based voucher and a project based voucher. A Tenant Based Voucher is not linked to a unit and can go with the tenant wherever the tenant chooses to move. A Project Based Voucher subsidy is linked to the unit.

2. Eligibility

The RAB asked for the definition of “family” under the Housing Choice Voucher (HCV) program. A family is two or more persons sharing residency whose income and resources are available to meet the family's needs, and who are either related by blood, marriage or operation of law, or who have evidenced a stable family relationship over a period of time (not less than one year).

Family includes but is not limited to:

- a. A family with or without children (the temporary absence of a child from the home due to placement in foster care shall not be considered in determining family composition and family size);
- b. An elderly family;
- c. A near-elderly family;
- d. A disabled family;
- e. A displaced family;
- f. The remaining member of a tenant family; and
- g. A single person who is not an elderly or displaced person, or a person with disabilities, or the remaining member of a tenant family.

3. Applications, Waiting List and Tenant Selection

The RAB asked what an applicant should do if they were pulled off the waitlist because they did not respond to a request from the SFHA but the applicant claims he/she never received the letter. In the event that an applicant has not received a letter from the SFHA that they have been pulled off of the waiting list, the applicant should contact the SFHA. An applicant has 12 months to be re-instated to the waitlist.

The RAB asked if disability would be a preference. Disability is being proposed as a preference.

The RAB asked what would happen if there were no local preferences. “No preference” would mean that, barring state or federal law, all applicants would be ordered by the date and time of their application.

4. *Income and Subsidy Determinations*

The RAB asked various questions about the Medical Expenses Deduction. The comments voiced refer to:

Medical Expenses Deduction [24 CFR 5.611(a)(3)(i)]

Unreimbursed medical expenses may be deducted to the extent that, in combination with any disability assistance expenses, they exceed three percent of annual income.

The medical expense deduction is permitted only for families in which the head, spouse, or co-head is at least 62 or is a person with disabilities. If a family is eligible for a medical expense deduction, the medical expenses of all family members are counted.

The RAB asked whether the minimum amount of rent due must be paid if the participant can claim a hardship. If the SFHA establishes a minimum rent greater than zero, the SFHA must grant an exemption from the minimum rent if a family is unable to pay the minimum rent because of financial hardship. The financial hardship exemption applies only to families required to pay the minimum rent. If a family's TTP is higher than the minimum rent, the family is not eligible for a hardship exemption. If the SFHA determines that a hardship exists, the TTP is the highest of the remaining components of the family's calculated TTP.

The RAB asked who determines utility allowances. The Housing Authority maintains a utility allowance schedule for all tenant-paid utilities (except telephone), for cost of tenant-supplied refrigerators and ranges, and for other tenant-paid housing services (e.g., trash collection (disposal of waste and refuse)). The utility allowance schedule is determined based on the typical cost of utilities and services paid by energy-conservative households that occupy housing of similar size and type in the same locality. In developing the schedule, the Housing Authority uses normal patterns of consumption for the community as a whole and current utility rate.

The RAB asked if the SFHA gives a certain amount of Earned Income Disallowance (EID). See below:

Earned Income Disallowance [24 CFR 960.255]

The earned income disallowance (EID) encourages people to enter the work force by not including the full value of increases in earned income for a period of time. The full text of 24 CFR 960.255 is included as Exhibit 7-4 at the end of this chapter.

1) Eligibility

This disallowance applies only to individuals in families already participating in the public housing program (not at initial examination). To qualify, the family must experience an increase in annual income that is the result of one of the following events:

- a) Employment of a family member who was previously unemployed for one or more years prior to employment. Previously unemployed includes a person who annually has earned not more than the minimum wage applicable to the community multiplied by 500 hours. The applicable minimum wage is the federal minimum wage unless there is a higher state or local minimum wage.

- b) Increased earnings by a family member whose earnings increase during participation in an economic self-sufficiency or job-training program. A self-sufficiency program includes a program designed to encourage, assist, train, or facilitate the economic independence of HUD-assisted families or to provide work to such families [24 CFR 5.603(b)].
- c) New employment or increased earnings by a family member who has received benefits or services under Temporary Assistance for Needy Families (TANF) or any other state program funded under Part A of Title IV of the Social Security Act within the past six months. If the benefits are received in the form of monthly maintenance, there is no minimum amount. If the benefits or services are received in a form other than monthly maintenance, such as one-time payments, wage subsidies, or transportation assistance, the total amount received over the six-month period must be at least \$500.

2) Calculation of the Disallowance

Calculation of the earned income disallowance for an eligible member of a qualified family begins with a comparison of the member's current income with his or her prior income. The SFHA defines prior income, or prequalifying income, as the family member's last certified income prior to qualifying for the EID. The family member's prior, or prequalifying, income remains constant throughout the period that he or she is receiving the EID.

3) Initial 12-Month Exclusion

During the initial 12-month exclusion period, the full amount (100 percent) of any increase in income attributable to new employment or increased earnings is excluded. The 12 months are cumulative and need not be consecutive. The initial EID exclusion period will begin on the first of the month following the date an eligible member of a qualified family is first employed or first experiences an increase in earnings.

4) Second 12-Month Exclusion and SFHA

During the second 12-month exclusion period, the exclusion is reduced to half (50 percent) of any increase in income attributable to employment or increased earnings. The 12 months are cumulative and need not be consecutive.

5) Lifetime Limitation

The EID has a four-year (48-month) lifetime maximum. The four-year eligibility period begins at the same time that the initial exclusion period begins and ends 48 months later. The one-time eligibility for the EID applies even if the eligible individual begins to receive assistance from another housing agency, if the individual moves between public housing and HCV assistance, or if there are breaks in assistance. During the 48-month eligibility period, the SFHA will conduct an interim reexamination each time there is a change in the family member's annual income that affects or is affected by the EID (e.g., when the family member's income falls to a level at or below his/her prequalifying income, when one of the exclusion periods ends, and at the end of the lifetime maximum eligibility period).

The RAB asked if financial aid is counted as income. More specifically how it is included and how it's impacted. Financial aid is counted as income and may subsequently be excluded. The full amount of student financial assistance is paid directly to the student or to the educational institution [24 CFR 5.609(c)(6)].

5. *Verification*

The RAB asked if preferences have to be verified. All preferences are verified at the time of intake.

The RAB asked what the Department of Housing and Urban Development's verification hierarchy is.

See below:

HUD's Verification Hierarchy [VG, p. 11-14]

HUD authorizes the SFHA to use five methods to verify family information and specifies the circumstances in which each method will be used. In general HUD requires the SFHA to use the most reliable form of verification that is available and to document the reasons when the SFHA uses a lesser form of verification.

In order of priority, the forms of verification that the SFHA will use are:

- Up-front Income Verification (—UIV) using HUD's Enterprise Income Verification (EIV) system
- Up-income Verification (UIV) using a non-HUD system
- Written Third-Party Verification (may be provided by applicant or participant)
- Written Third-party Verification Form
- Oral Third –Party Verification
- Review of Documents
- Self-Certification

6. *Housing Quality Standards and Rent Reasonableness Determinations*

The RAB asked if a unit must include heat in the kitchen or bathroom. The HQS manual indicates, in the area designated for adequacy of heating equipment that the heat is not required in secondary rooms (rooms not used for living).

The RAB asked if a unit can fail inspection because the surrounding area of property is messy.

See below:

The Housing Quality Standards (HQS) manual labels the following as fail items for site and neighborhood conditions:

1. Other buildings, on or near the property, that pose a serious health hazard or safety hazards (dilapidated shed or garage with potential to collapse).
2. Evidence of flooding or major drainage problems
3. Proximity to open sewage
4. Fire hazards
5. Abnormal air pollution or smoke which continues through the year
6. Continuous or excessive vibration caused by vehicular traffic

It's not necessarily a messy surrounding area that will fail but one that poses a serious observable hazard will.

The RAB asked what the minimum rent for the SFHA is. The minimum rent is \$25.00.

7. *Reexaminations*

The RAB asked whether the following year's expenses are anticipated in the recertification.

Yes, the SFHA is required to count all income anticipated to be received from a source outside the family during the 12-month period following the admission or annual reexamination effective date [24 CFR 5.609(a)(2)].

The RAB asked if income/assets must be reported annually. Yes.

8. *Termination of Assistance and Tenancy*

The RAB voiced the confusion about 30 day and 15 day notices. A 30 day notice is effective for 30 days. When a person gets a 15 day notice it is intended to be a reminder that there are only 15 days remaining.

The RAB asked if a family could be terminated after six months of receiving home assistance. A family can be terminated for violating the terms of their agreement with the SFHA regardless of how long they have had assistance.

9. *Owners*

The RAB asked what the repercussions are to a landlord if he/she does not fulfill his/her responsibility/agreement. If an owner does not fulfill their responsibilities, the rent is abated. After six months of abatement, the Housing Assistance Payment (HAP) contracted is canceled.

The RAB asked if a landlord is required to have a briefing prior to becoming part of the HCV program. An SFHA employee provides the landlord with a packet and, at the initial inspection, responds to any questions the landlord may have.

RAB members asked if there is a specific time that a landlord can request a rent increase. A landlord can request a rent increase at any time but he or she is not guaranteed an increase.

The RAB asked whether a family member/relative may rent to a fellow family member/relative. A family member/relative of someone in the Housing Choice Voucher Program cannot rent to a fellow family member/relative. The only exception is as reasonable accommodation.

The RAB asked what the time frame is for a Change of Ownership and if a new owner is required to keep a Housing Choice Voucher tenant. The time frame for a Change of Ownership is 10 days under the proposed policy. The new owner is required to keep the Housing Choice Voucher tenant.

10. *Special Housing Types*

The RAB asked if an individual can request a reasonable accommodation for mental disability. Yes.

11. *Program Administration*

The RAB asked what “Program Administration” refers to. Program administration is provided in Chapter 16 of the Administrative Plan and includes record keeping, funding determination, and day-to-day procedures from within the SFHA.

The RAB asked what “SEMAP” is. SEMAP stands for Section Eight Management Assessment Program and is the review the Department of Housing and Urban Development provides to the Housing Authority regarding the administration of the Housing Choice Voucher Program.

12. *Project-Based Vouchers*

The RAB asked whether an individual or family can move with a Project Based Voucher (PBV). If the PBV unit the individual/family lives in provides that a Tenant Based Voucher will be provided in the 13th month, if available, the participant must contact their eligibility worker to ascertain whether a voucher is available to him/her.

RAB members asked why a Housing Opportunities for People With Aids client can’t port out of the City and County of San Francisco. HOPWA is a locally funded San Francisco City and County Program funded through the Mayor’s Office of Housing. Thus, its effect is local.

The RAB asked what happened to the funding of the HOPWA program. The San Francisco Redevelopment Agency was dissolved and the Mayor's Office of Housing is now taking on the funding aspect of the HOPWA program.

The RAB asked what would happen if an applicant does not accept a Project-Based Voucher. If an applicant does not accept a Project-Based Voucher then the applicant will remain on the Housing Choice Voucher Waitlist.

13. Project Based Voucher (PBV) Conversion

The RAB asked if the PBV conversion will result in modern-looking buildings. A lot of improvements can be done with a PBV conversion. Many of the improvements are for kitchens, bathrooms, hot and cold water distribution as well as heating and ventilation that will make the apartment's look and feel more modern.

The RAB asked whether the sites being converted to Project Based would maintain their property managers. The answer to this is unknown but it is possible that property managers at the developments being converted may continue to work at the properties with additional training.

14. Other Comments and Questions

The RAB asked whether the Housing Authority still has a Family Self Sufficiency Program (FSS) program. Yes.

The RAB asked what the "CFR" stands for. The Code of Federal Regulations (CFR) is the codification of the general and permanent rules and regulations (sometimes called administrative law) published in the Federal Register by the executive departments and agencies of the Federal Government of the United States.

The RAB asked what "ACC" stands for. Annual Contributions Contract (ACC): The written contract between HUD and a housing authority under which HUD agrees to provide funding for a program under the 1937 Act, and the housing authority agrees to comply with HUD requirements for the program.

The RAB asked how for HUD lets the SFHA modify federal laws. The SFHA cannot modify federal laws.

The RAB asked what Title V of the Older Americans Act of 1985 is and what it entails. The Older Americans Act of 1965 (Pub.L. 89-73, 79 Stat. 218, July 14, 1965) was the first federal level initiative aimed at providing comprehensive services for older adults. It created the National Aging Network comprising the Administration on Aging on the federal level, State Units on Aging, and Area Agencies on Aging at the local level. The network provides funding - based primarily on the percentage of an area's population 60 and older - for nutrition and supportive home and community-based services, disease prevention/health promotion services, elder rights programs, the National Family Caregiver Support Program, and the Native American Caregiver Support Program.

In 2006 congress reauthorized the act in its entirety, effective through FY 2011.

In various meetings the SFHA received comments about the positive changes that have been going on and various examples of how RAB members see that it is improving. The SFHA is proud of all of the changes that have been implemented within the agency and is excited about the positive direction in which this agency is headed.

C. Housing Choice Voucher Program(s)

The SFHA would like to thank all of the Resident Advisory Board members, residents, participants, public, and community partners/stakeholders who actively participated in the 2012 Annual Plan process.

Attachment IX

Units to be Modernized

**SAN FRANCISCO HOUSING AUTHORITY
PHASE II UNITS UNDER MODERNIZATION
FOR THE PERIOD BEGINNING JULY 1, 2011**

Development #	Building No.	Building Entrance #	Unit #	Site/Address	Count	Comments
HOLLY COURT						
CA001000966	0110	7	010083	83 Patton	1	Completed
CA001000966	0109	9	010247	147A Highland	1	Completed
COUNT					2	
ALEMANY						
CA001000966	1120	1	110512	512 Alemany Blvd	1	
CA001000966	1113	4	110566	566 Alemany Blvd	1	
CA001000966	1118	4	110906	906 Ellsworth St	1	
CA001000966	1111	2	110959	959 Ellsworth St	1	
CA001000966	1103	2	110972	972 Ellsworth St	1	Completed
CA001000966	1103	3	110974	974 Ellsworth St	1	Completed
CA001000966	1109	1	110987	987 Ellsworth St	1	Completed
CA001000966	1125	1	110817	817 Ellsworth St	1	
CA001000966	1108	4	110922	922 Ellsworth St	1	
CA001000966	1104	3	110962	962 Ellsworth St	1	Completed
CA001000966	1109	6	110997	997 Ellsworth St	1	Completed
COUNT					11	
POTRERO TERRACE						
CA001000967	0205	1	020170	950 Connecticut	1	Completed
CA001000967	0255	1	020145	1032 Connecticut	1	Completed
CA001000967	0255	1	020148	1038 Connecticut	1	Completed
CA001000967	0255	1	020287	1043 Connecticut	1	Completed
CA001000967	0253	1	020132	1082 Connecticut	1	Completed
CA001000967	0205	1	020172	954 Connecticut	1	Completed
CA001000967	0233	1	020137	1054 Connecticut	1	Completed
CA001000967	0253	1	020134	1086 Connecticut	1	Completed
CA001000967	0206	1	020193	934 Connecticut	1	Completed
CA001000967	0209	1	020239	937 Connecticut	1	Completed
CA001000967	0205	1	020176	962 Connecticut	1	Completed
CA001000967	0204	1	020155	1000 Connecticut	1	Completed
CA001000967	0204	1	020156	1002 Connecticut	1	Completed
CA001000967	0204	1	020157	1004 Connecticut	1	Completed
CA001000967	0204	1	020158	1006 Connecticut	1	Completed
CA001000967	0211	1	020279	1023 Connecticut	1	Completed
CA001000967	0204	1	020168	1026 Connecticut	1	Completed
CA001000967	0255	1	020290	1049 Connecticut	1	Completed
CA001000967	0233	1	020143	1066 Connecticut	1	Completed
CA001000967	0253	1	020128	1074 Connecticut	1	Completed
CA001000967	0250	9	020056	1116 Connecticut	1	Completed

**SAN FRANCISCO HOUSING AUTHORITY
PHASE II UNITS UNDER MODERNIZATION
FOR THE PERIOD BEGINNING JULY 1, 2011**

Development #	Building No.	Building Entrance #	Unit #	Site/Address	Count	Comments
CA001000967	0215	1	020413	27 Dakota St	1	Completed
CA001000967	0215	1	020423	47 Dakota St	1	Completed
CA001000967	0214	1	020366	60 Dakota St	1	Completed
CA001000967	0216	1	020434	73 Dakota St	1	Completed
CA001000967	0214	1	020377	82 Dakota St	1	Completed
CA001000967	0213	1	020356	110 Dakota St	1	Completed
CA001000967	0218	1	020461	157 Dakota St	1	Completed
CA001000967	0218	1	020465	165 Dakota St	1	
CA001000967	0243	1	020316	1622 25Th Street	1	Completed
CA001000967	0202	2	020060	1803 25Th Street	1	Completed
CA001000967	0202	10	020068	1819 25Th Street	1	
CA001000967	0203	3	020095	1868 25Th Street	1	
CA001000967	0203	1	020104	1886 25Th Street	1	Completed
CA001000967	0230	7	020091	1913 25th Street	1	
CA001000967	0256	1	020291	1051 Connecticut	1	Completed
CA001000967	0207	1	020209	1003 Wisconsin	1	
COUNT					37	
SUNNYDALE						
CA001000968	0302	4	030012	1930 Sunnydale	1	Co
CA001000968	0309	3	030091	1752 Sunnydale	1	Completed
CA001000968	0318	8	030157	1514 Sunnydale	1	Completed
CA001000968	0319	8	030172	1515 Sunnydale	1	Completed
CA001000968	0322	2	030222	1635 Sunnydale	1	Completed
CA001000968	0344	7	030271	1837 Sunnydale	1	Completed
CA001000968	0347	6	030302	1935 Sunnydale	1	Completed
CA001000968	0348	1	030309	1949 Sunnydale	1	Completed
CA001000968	0338	6	030342	11 Santos	1	Completed
CA001000968	0366	6	030384	60 Santos	1	Completed
CA001000968	0365	7	030395	32 Santos	1	Completed
CA001000968	0339	6	030404	12 Santos	1	Completed
CA001000968	0351	6	030431	60 Brookdale	1	Completed
CA001000968	0355	8	030468	158 Brookdale	1	Completed
CA001000968	0375	3	030481	169 Brookdale	1	Completed
CA001000968	0329	6	030565	12 Blythdale	1	Completed
CA001000968	0329	8	030567	16 Blythdale	1	Completed
CA001000968	0387	3	030747	49 Blythdale	1	Completed
CA001000968	0367	3	030614	124 Blythdale	1	Completed
CA001000968	4802	6	480806	612B Velasco	1	Completed
CA001000968	4802	7	480807	616A Velasco	1	Completed

**SAN FRANCISCO HOUSING AUTHORITY
PHASE II UNITS UNDER MODERNIZATION
FOR THE PERIOD BEGINNING JULY 1, 2011**

Development #	Building No.	Building Entrance #	Unit #	Site/Address	Count	Comments
CA001000968	0367	1	030612	120 Blythdale	1	Completed
CA001000968	0349	8	030417	16 Brookdale	1	Completed
CA001000968	0353	1	030442	100 Brookdale	1	Completed
CA001000968	0360	5	030504	109 Brookdale	1	Completed
CA001000968	0354	6	030456	132 Brookdale	1	Completed
CA001000968	0354	7	030457	134 Brookdale	1	Completed
CA001000968	0374	3	030489	149 Brookdale	1	
CA001000968	0319	5	030169	1509 Sunnydale	1	Completed
CA001000968	0305	1	030041	1848 Sunnydale	1	Completed
CA001000968	0347	7	030303	1937 Sunnydale	1	Completed
CA001000968	0347	12	030308	1947 Sunnydale	1	Completed
CA001000968	0348	11	030319	1969 Sunnydale	1	Completed
COUNT						33
WESTSIDE COURTS						
CA001000969	0604	8	060241	1515 Broderick # 241	1	
CA001000969	0603	15	060223	2474 Post #223	1	Completed
CA001000969	0603	22	060321	2486 Post #321	1	Completed
CA001000969	0601	23	060332	2529 Sutter #332	1	Completed
CA001000969	0605	12	060328	2551 Sutter #328	1	Completed
CA001000969	0605	13	060129	2553 Sutter #129	1	Completed
COUNT						6
WESTBROOK APTS.						
CA001000970	0736	6	070150	29 Harbor	1	Completed
CA001000970	0714	3	070011	5 Northridge	1	Completed
CA001000970	0713	6	070022	12 Northridge	1	Completed
CA001000970	0719	5	070053	51 Northridge	1	Completed
CA001000970	0732	3	070181	104 Kiska	1	Completed
CA001000970	0701	4	070176	60 Harbor	1	Completed
CA001000970	0727	4	070198	138 Kiska	1	Completed
CA001000970	0713	3	070019	6 Northridge	1	Completed
CA001000970	0713	4	070020	8 Northridge	1	Completed
CA001000970	0723	4	070078	73 Northridge	1	Completed
CA001000970	0706	2	070090	84 Northridge	1	Completed
COUNT						11
POTRERO ANNEX						
CA001000971	0809	1	080021	43 Turner Terrace	1	Completed
CA001000971	0811	1	080038	42 Turner Terrace	1	Completed
CA001000971	0810	1	080024	53 Turner Terrace	1	Completed
CA001000971	0820	1	080078	766 Missouri	1	Completed

**SAN FRANCISCO HOUSING AUTHORITY
PHASE II UNITS UNDER MODERNIZATION
FOR THE PERIOD BEGINNING JULY 1, 2011**

Development #	Building No.	Building Entrance #	Unit #	Site/Address	Count	Comments
CA001000971	0801	5	080005	9 Turner Terrace	1	Completed
COUNT						4
PING YUEN						
CA00100972	1004	1	100636	895 Pacific Ave. #636	1	
COUNT						1
HUNTERS POINT A (EAST & WEST)						
CA001000973	1217	6	120203	1075 Oakdale H	1	Completed
CA001000973	1211	6	120132	1010 Griffith	1	Completed
CA001000973	1209	11	120112	780 Kirkwood Apt. L	1	Completed
CA001000973	1205	2	120069	729 Jerrold	1	Completed
CA001000973	1208	10	120097	750 Kirkwood Apt. K	1	Completed
CA001000973	1202	2	120033	770 Jerrold Apt. E	1	Completed
CA001000973	1202	5	120036	770 Jerrold Apt. H	1	Completed
CA001000973	1211	5	120131	1008 Griffith	1	Completed
CA001000973	1218	2	120214	1093 Oakdale	1	Completed
CA001000973	1216	8	120176	1015 Oakdale Apt. K	1	Completed
COUNT						10
HUNTERS VIEW						
CA001000974	1542	2	150306	43 Middle Point Rd	1	
CA001000974	1545	5	150325	81 Middle Point Rd	1	
CA001000974	1555	2	150343	139 Middle Point Rd	1	
CA001000974	1512	3	150074	116 West Point Rd	1	
CA001000974	1516	2	150089	148 West Point Rd	1	
CA001000974	1519	2	150105	180 West Point Rd	1	
CA001000974	1546	2	150203	212 West Point Rd	1	
CA001000974	1548	1	150208	224 West Point Rd	1	
CA001000974	1551	4	150197	243 West Point Rd	1	
CA001000974	1548	4	150211	230 West Point Rd	1	
CA001000974	1540	1	150239	27 Wills St	1	
CA001000974	1540	3	150241	31 Wills St	1	
CA001000974	1540	4	150242	33 Wills St	1	
COUNT						13
ALICE GRIFFITH						
CA001000975	1612	3	160125	6 Cameron Way	1	Completed
CA001000975	1613	1	160133	30 Cameron Way	1	
CA001000975	1635	7	160198	41 Cameron Way	1	Completed
CA001000975	1619	2	160176	152 Cameron Way	1	
CA001000975	1640	1	160347	100 Double Rock	1	Completed
CA001000975	1624	1	160105	2462 Griffith	1	Completed

**SAN FRANCISCO HOUSING AUTHORITY
PHASE II UNITS UNDER MODERNIZATION
FOR THE PERIOD BEGINNING JULY 1, 2011**

Development #	Building No.	Building Entrance #	Unit #	Site/Address	Count	Comments
CA001000975	1623	1	160113	2500 Griffith	1	Completed
CA001000975	1631	1	160254	71 Nichols	1	Completed
CA001000975	1612	4	160126	8 Cameron Way	1	Completed
CA001000975	1635	2	160193	31 Cameron Way	1	
CA001000975	1616	5	160153	78 Cameron Way	1	Completed
CA001000975	1628	4	160238	27 Nichols	1	Completed
CA001000975	1627	7	160233	15 Nichols	1	Completed
COUNT						13
ROSA PARKS						
CA00100978	1701	1	170611	1251 Turk st # 611	1	Completed
CA00100978	1701	1	170318	1251 Turk st # 318	1	Completed
CA00100978	1701	1	170214	1251 Turk st # 214	1	Completed
COUNT						3
ROBERT B. PITTS						
CA001000988	5118	1	510110	1108 Scott St	1	Completed
CA001000988	5112	1	510302	1624 Turk St	1	Completed
CA001000988	5137	1	510358	1762 Turk St	1	Completed
CA001000988	5133	1	510144	1121 Scott St	1	Completed
CA001000988	5111	1	510358	1115 Pierce St	1	Completed
COUNT						5
GRAND TOTAL						149

**SAN FRANCISCO HOUSING AUTHORITY
PHASE III UNITS UNDER MODERNIZATION
FOR THE PERIOD BEGINNING MAY 2012**

Development t#	Building No.	Building Entrance #	Unit#	Site/Address	Count	Comments
HOLLY COURT						
CA001000966	0105	1	010174	174 Appleton	1	
COUNT						
ALEMANY						
CA001000966	1120	3	110516	516 Alemany	1	
CA001000966	1113	3	110564	564 Alemany	1	
CA001000966	1109	5	110995	995 Ellsworth St	1	
CA001000966	1123	6	110855	855 Ellsworth	1	
CA001000966	1103	9	110986	986 Ellsworth St	1	
COUNT						
POTRERO TERRACE						
CA001000967	0203	1	020102	1882 25Th Street	1	
CA001000967	0215	1	020411	23 Dakota St	1	
CA001000967	0251	2	020002	1257 Wisconsin	1	
CA001000967	0202	8	020066	1815 25Th Street	1	
CA001000967	0252	7	020080	1847 25Th Street	1	
CA001000967	0203	7	020099	1876 25th Street	1	
CA001000967	0206	1	020189	926 Connecticut	1	
CA001000967	0206	1	020195	938 Connecticut	1	
CA001000967	0206	1	020198	944 Connecticut	1	
CA001000967	0210	1	020256	973 Connecticut	1	
CA001000967	0233	1	020138	1056 Connecticut	1	
CA001000967	0241	1	020294	1061 Connecticut	1	
CA001000967	0257	11	020022	1820 26th Street	1	
CA001000967	0235	1	020402	1 Dakota St	1	
CA001000967	0245	1	020388	44 Dakota St	1	
CA001000967	0216	1	020433	71 Dakota St	1	
CA001000967	0213	1	020355	108 Dakota St	1	
CA001000967	0207	1	020214	1013 Wisconsin	1	
COUNT						
SUNNYDALE						
CA001000968	0310	2	030102	1726 Sunnydale	1	
CA001000968	0350	2	030419	32 Brookdale	1	
CA001000968	0360	8	030507	115 Brookdale	1	
CA001000968	0354	10	030460	140 Brookdale	1	
CA001000968	0321	1	030229	1651 Sunnydale	1	
CA001000968	0342	2	030250	1753 Sunnydale	1	
CA001000968	0308	11	030087	1792 Sunnydale	1	
CA001000968	0303	3	030019	1904 Sunnydale	1	
CA001000968	0387	4	030748	51 Blythdale	1	
CA001000968	0317	2	030322	172 Hahn	1	
CA001000968	0387	6	030750	55 Blythdale	1	

**SAN FRANCISCO HOUSING AUTHORITY
PHASE III UNITS UNDER MODERNIZATION
FOR THE PERIOD BEGINNING MAY 2012**

Development t#	Building No.	Building Entrance #	Unit#	Site/Address	Count	Comments
CA001000968	0305	2	030042	1850 Sunnydale	1	
CA001000968	0339	3	030407	6 Santos	1	
CA001000968	0349	5	030414	10 Brookdale	1	
CA001000968	0363	5	030540	33 Brookdale	1	
CA001000968	0351	3	030428	54 Brookdale	1	
CA001000968	0361	12	030523	95 Brookdale	1	
CA001000968	0353	2	030443	102 Brookdale	1	
CA001000968	0389	5	030761	25 Blythdale	1	
CA001000968	0330	8	030575	32 Blythdale	1	
CA001000968	0335	1	030600	82 Blythdale	1	
CA001000968	0382	4	030718	127 Blythdale	1	
CA001000968	0382	7	030721	133 Blythdale	1	
CA001000968	0367	8	030619	134 Blythdale	1	
CA001000968	0369	1	030628	160 Blythdale	1	
CA001000968	0327	2	030174	1521 Sunnydale	1	
CA001000968	0314	4	030145	1546 Sunnydale	1	
CA001000968	0325	5	030193	1559 Sunnydale	1	
CA001000968	0309	2	030090	1750 Sunnydale	1	
CA001000968	0309	6	030094	1758 Sunnydale	1	
CA001000968	0307	8	030072	1814 Sunnydale	1	
CA001000968	0306	11	030063	1844 Sunnydale	1	
CA001000968	0304	12	030040	1894 Sunnydale	1	
CA001000968	0303	8	030024	1914 Sunnydale	1	
COUNT						
WESTBROOK APTS.						
CA001000970	0712	2	070002	849 Innes	1	
CA001000970	0712	4	070004	853 Innes	1	
CA001000970	0704	2	070154	16 Harbor	1	
CA001000970	0736	5	070149	27 Harbor	1	
CA001000970	0702	4	070170	48 Harbor	1	
CA001000970	0714	4	070012	7 Northridge	1	
CA001000970	0710	5	070047	38 Northridge	1	
CA001000970	0719	6	070054	53 Northridge	1	
CA001000970	0729	1	070101	101 Northridge	1	
COUNT						
POTRERO ANNEX						
CA001000971	0820	1	080079	768 Missouri	1	
CA001000971	08'08	1	080008	17 Turner Terrace	1	
COUNT						
HUNTERS POINT A (EAST & WEST)						
CA001000973	1208	1	120085	734 Kirkwood	1	
CA001000973	1222	10	120311	1150 Palou #l	1	

**SAN FRANCISCO HOUSING AUTHORITY
PHASE III UNITS UNDER MODERNIZATION
FOR THE PERIOD BEGINNING MAY 2012**

Development t#	Building No.	Building Entrance #	Unit#	Site/Address	Count	Comments
CA001000973	1212	5	120137	1022 Griffith	1	
CA001000973	1213	2	120152	1032 Griffith	1	
CA001000973	1216	11	120181	1021 Oakdale	1	
CA001000973	1216	13	120183	1029 Oakdale	1	
CA001000973	1220	8	120241	1165 Oakdale #L	1	
CA001000973	1206	14	120285	1066 Palou #J	1	
CA001000973	1205	9	120293	1088 Palou	1	
CA001000973	1222	7	120308	1150 Palou #F	1	
CA001000973	1205	4	120067	735 Jerrold	1	
CA001000973	1203	1	120025	740 Jerrold	1	
CA001000973	1204	1	120062	749 Jerrold	1	
CA001000973	1202	3	120034	770 Jerrold #F	1	
CA001000973	1208	11	120098	750 Kirkwood #L	1	
CA001000973	1208	7	120094	750 Kirkwood #H	1	
CA001000973	1209	6	120107	780 Kirkwood #G	1	
CA001000973	1218	10	120125	790 Kirkwood #K	1	
COUNT						
HUNTERS VIEW						
CA001000974	1513	3	150078	124 West Point	1	
COUNT						
ALICE GRIFFITH						
CA001000975	1635	8	160199	43 Cameron Way	1	
CA001000975	1612	10	160132	20 Cameron Way	1	
CA001000975	1635	3	160194	33 Cameron Way	1	
CA001000975	1616	6	160154	80 Cameron Way	1	
CA001000975	1625	2	160098	2408 Griffith	1	
CA001000975	1623	4	160116	2512 Griffith	1	
CA001000975	1603	1	160301	1051 Fitzgerald	1	
CA001000975	1602	4	160288	1007 Fitzgerald	1	
COUNT						
ROBERT B. PITTS						
CA001000988	5131	1	510132	1155 Scott	1	
CA001000988	5126	1	510453	1851 Eddy	1	
CA001000988	5113	1	510311	1638 Turk	1	
COUNT						
GRAND TOTAL					99	

SAN FRANCISCO HOUSING AUTHORITY
UNITS UNDERGOING MODERNIZATION - FIRE DAMAGED
FOR THE PERIOD STARTING JULY 1, 2011

Development #	Building No.	Building Entrance #	Unit #	Ste/Address	Count	Comments
POTRERO TERRACE						
CA001000967	0204	1	020159	1008 Connecticut	1	
CA001000967	0204	1	020160	1010 Connecticut	1	
CA001000967	0212	1	020341	150 Dakota St	1	
COUNT						3
SUNNYDALE						
CA001000968	0375	2	030482	167 Brookdale	1	
CA001000968	0390	1	030765	1 Blythdale	1	
CA001000968	0381	6	030708	157 Blythdale	1	
COUNT						3
ALICE GRIFFITH						
CA001000975	1636	4	160206	61 Cameron	1	
COUNT						1
350 ELLIS AND 666 ELLIS						
CA001000981	2501	1	250101	350 Ellis # 1A	1	
CA001000981	2501	1	250108	350 Ellis # 1H	1	
CA001000981	2501	1	250201	350 Ellis # 2A	1	
CA001000981	2501	1	250301	350 Ellis # 3A	1	
CA001000981	2501	1	250401	350 Ellis # 4A	1	
CA001000981	2501	1	250402	350 Ellis # 4B	1	
CA001000981	2501	1	250408	350 Ellis # 4H	1	
CA001000981	2501	1	250501	350 Ellis # 5A	1	
CA001000981	2501	1	250502	350 Ellis # 5B	1	
CA001000981	2501	1	250504	350 Ellis # 5D	1	
CA001000981	2501	1	250505	350 Ellis # 5E	1	
CA001000981	2501	1	250506	350 Ellis # 5F	1	
CA001000981	2501	1	250507	350 Ellis # 5G	1	
CA001000981	2501	1	250508	350 Ellis # 5H	1	
CA001000981	2501	1	250601	350 Ellis # 6A	1	
CA001000981	2501	1	250602	350 Ellis # 6B	1	
CA001000981	2501	1	250705	350 Ellis # 7E	1	
CA001000981	3201	1	321204	666 Ellis # 1204	1	
COUNT						18

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000966	110992	ALEMANY	992 Ellsworth St		4
000966	110947	ALEMANY	947 Ellsworth St.		2
000966	110938	ALEMANY	938 Ellsworth St.		2
000966	110916	ALEMANY	916 Ellsworth St.		2
000966	110918	ALEMANY	918 ELLSWORTH ST		3
000966	110920	ALEMANY	920 ELLSWORTH ST		2
000966	110907	ALEMANY	907 ELLSWORTH ST		2
000966	110908	ALEMANY	908 ELLSWORTH ST		2
000966	110909	ALEMANY	909 ELLSWORTH ST		2
000966	110910	ALEMANY	910 ELLSWORTH ST		2
000966	110911	ALEMANY	911 ELLSWORTH ST		3
000966	110912	ALEMANY	912 ELLSWORTH ST		3
000966	110914	ALEMANY	914 ELLSWORTH ST		1
000966	110924	ALEMANY	924 ELLSWORTH ST		2
000966	110925	ALEMANY	925 ELLSWORTH ST		3
000966	110926	ALEMANY	926 ELLSWORTH ST		2
000966	110927	ALEMANY	927 ELLSWORTH ST		2
000966	110928	ALEMANY	928 ELLSWORTH ST		3
000966	110929	ALEMANY	929 ELLSWORTH ST		2
000966	110930	ALEMANY	930 ELLSWORTH ST		1
000966	110931	ALEMANY	931 ELLSWORTH ST		2
000966	110932	ALEMANY	932 ELLSWORTH ST		3
000966	110933	ALEMANY	933 ELLSWORTH ST		2
000966	110934	ALEMANY	934 ELLSWORTH ST		2
000966	110935	ALEMANY	935 ELLSWORTH ST		3
000966	110936	ALEMANY	936 ELLSWORTH ST		2
000966	110857	ALEMANY	857 ELLSWORTH ST		3
000966	110859	ALEMANY	859 ELLSWORTH ST		1
000966	110861	ALEMANY	861 ELLSWORTH ST		1
000966	110863	ALEMANY	863 ELLSWORTH ST		3
000966	110865	ALEMANY	865 ELLSWORTH ST		2
000966	110867	ALEMANY	867 ELLSWORTH ST		2
000966	110869	ALEMANY	869 ELLSWORTH ST		2
000966	110871	ALEMANY	871 ELLSWORTH ST		2
000966	110873	ALEMANY	873 ELLSWORTH ST		3
000966	110875	ALEMANY	875 ELLSWORTH ST		1
000966	110900	ALEMANY	900 ELLSWORTH ST		1
000966	110901	ALEMANY	901 ELLSWORTH ST		3
000966	110902	ALEMANY	902 ELLSWORTH ST		3
000966	110903	ALEMANY	903 ELLSWORTH ST		2
000966	110904	ALEMANY	904 ELLSWORTH ST		2
000966	110905	ALEMANY	905 ELLSWORTH ST		2
000966	110568	ALEMANY	568 ALEMANY BLVD		2
000966	110570	ALEMANY	570 ALEMANY BLVD		3
000966	110600	ALEMANY	600 ALEMANY BLVD		3
000966	110602	ALEMANY	602 ALEMANY BLVD		2
000966	110604	ALEMANY	604 ALEMANY BLVD		2
000966	110606	ALEMANY	606 ALEMANY BLVD		2
000966	110608	ALEMANY	608 ALEMANY BLVD		2
000966	110610	ALEMANY	610 ALEMANY BLVD		3
000966	110801	ALEMANY	801 ELLSWORTH ST		1
000966	110803	ALEMANY	803 ELLSWORTH ST		3
000966	110805	ALEMANY	805 ELLSWORTH ST		2
000966	110807	ALEMANY	807 ELLSWORTH ST		2
000966	110809	ALEMANY	809 ELLSWORTH ST		2
000966	110811	ALEMANY	811 ELLSWORTH ST		2
000966	110813	ALEMANY	813 ELLSWORTH ST		3
000966	110815	ALEMANY	815 ELLSWORTH ST		1

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000966	110819	ALEMANY	819 ELLSWORTH ST		3
000966	110821	ALEMANY	821 ELLSWORTH ST		2
000966	110823	ALEMANY	823 ELLSWORTH ST		2
000966	110825	ALEMANY	825 ELLSWORTH ST		2
000966	110827	ALEMANY	827 ELLSWORTH ST		2
000966	110829	ALEMANY	829 ELLSWORTH ST		3
000966	110830	ALEMANY	830 ELLSWORTH ST		1
000966	110831	ALEMANY	831 ELLSWORTH ST		1
000966	110832	ALEMANY	832 ELLSWORTH ST		3
000966	110834	ALEMANY	834 ELLSWORTH ST		2
000966	110836	ALEMANY	836 ELLSWORTH ST		2
000966	110838	ALEMANY	838 ELLSWORTH ST		2
000966	110840	ALEMANY	840 ELLSWORTH ST		2
000966	110842	ALEMANY	842 ELLSWORTH ST		3
000966	110844	ALEMANY	844 ELLSWORTH ST		1
000966	110845	ALEMANY	845 ELLSWORTH ST		1
000966	110847	ALEMANY	847 ELLSWORTH ST		3
000966	110849	ALEMANY	849 ELLSWORTH ST		2
000966	110851	ALEMANY	851 ELLSWORTH ST		2
000966	110853	ALEMANY	853 ELLSWORTH ST		2
000966	110500	ALEMANY	500 ALEMANY BLVD		3
000966	110502	ALEMANY	502 ALEMANY BLVD		2
000966	110504	ALEMANY	504 ALEMANY BLVD		2
000966	110506	ALEMANY	506 ALEMANY BLVD		2
000966	110508	ALEMANY	508 ALEMANY BLVD		2
000966	110510	ALEMANY	510 ALEMANY BLVD		3
000966	110518	ALEMANY	518 ALEMANY BLVD		2
000966	110520	ALEMANY	520 ALEMANY BLVD		2
000966	110522	ALEMANY	522 ALEMANY BLVD		3
000966	110524	ALEMANY	524 ALEMANY BLVD		3
000966	110526	ALEMANY	526 ALEMANY BLVD		2
000966	110528	ALEMANY	528 ALEMANY BLVD		2
000966	110530	ALEMANY	530 ALEMANY BLVD		2
000966	110532	ALEMANY	532 ALEMANY BLVD		2
000966	110534	ALEMANY	534 ALEMANY BLVD		3
000966	110536	ALEMANY	536 ALEMANY BLVD		3
000966	110538	ALEMANY	538 ALEMANY BLVD		2
000966	110540	ALEMANY	540 ALEMANY BLVD		2
000966	110542	ALEMANY	542 ALEMANY BLVD		2
000966	110544	ALEMANY	544 ALEMANY BLVD		2
000966	110548	ALEMANY	548 ALEMANY BLVD		3
000966	110550	ALEMANY	550 ALEMANY BLVD		2
000966	110552	ALEMANY	552 ALEMANY BLVD		2
000966	110554	ALEMANY	554 ALEMANY BLVD		2
000966	110556	ALEMANY	556 ALEMANY BLVD		2
000966	110558	ALEMANY	558 ALEMANY BLVD		3
000966	110560	ALEMANY	560 ALEMANY BLVD		3
000966	110562	ALEMANY	562 ALEMANY BLVD		2
000966	110940	ALEMANY	940 ELLSWORTH ST		2
000966	110942	ALEMANY	942 ELLSWORTH ST		3
000966	110944	ALEMANY	944 ELLSWORTH ST		3
000966	110945	ALEMANY	945 ELLSWORTH ST		3
000966	110946	ALEMANY	946 ELLSWORTH ST		2
000966	110987	ALEMANY	987 ELLSWORTH ST		3
000966	110988	ALEMANY	988 ELLSWORTH ST		2
000966	110990	ALEMANY	990 ELLSWORTH ST		2
000966	110991	ALEMANY	991 ELLSWORTH ST		2
000966	110948	ALEMANY	948 ELLSWORTH ST		2

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000966	110949	ALEMANY	949 ELLSWORTH ST		2
000966	110950	ALEMANY	950 ELLSWORTH ST		2
000966	110951	ALEMANY	951 ELLSWORTH ST		2
000966	110952	ALEMANY	952 ELLSWORTH ST		2
000966	110953	ALEMANY	953 ELLSWORTH ST		2
000966	110954	ALEMANY	954 ELLSWORTH ST		3
000966	110955	ALEMANY	955 ELLSWORTH ST		3
000966	110957	ALEMANY	957 ELLSWORTH ST		3
000966	110958	ALEMANY	958 ELLSWORTH ST		3
000966	110960	ALEMANY	960 ELLSWORTH ST		2
000966	110961	ALEMANY	961 ELLSWORTH ST		2
000966	110962	ALEMANY	962 ELLSWORTH ST		2
000966	110963	ALEMANY	963 ELLSWORTH ST		2
000966	110964	ALEMANY	964 ELLSWORTH ST		2
000966	110965	ALEMANY	965 ELLSWORTH ST		2
000966	110966	ALEMANY	966 ELLSWORTH ST		2
000966	110967	ALEMANY	967 ELLSWORTH ST		4
000966	110968	ALEMANY	968 ELLSWORTH ST		3
000966	110970	ALEMANY	970 ELLSWORTH ST		3
000966	110972	ALEMANY	972 ELLSWORTH ST		2
000966	110974	ALEMANY	974 ELLSWORTH ST		2
000966	110976	ALEMANY	976 ELLSWORTH ST		2
000966	110978	ALEMANY	978 ELLSWORTH ST		2
000966	110980	ALEMANY	980 ELLSWORTH ST		3
000966	110982	ALEMANY	982 ELLSWORTH ST		3
000966	110984	ALEMANY	984 ELLSWORTH ST		2
000966	110993	ALEMANY	993 ELLSWORTH ST		2
000966	110514	ALEMANY	514 ALEMANY BLVD		2
000966	110997	ALEMANY	997 ELLSWORTH ST		2
000966	110999	ALEMANY	999 ELLSWORTH ST		3
000966	110516	ALEMANY	516 ALEMANY BLVD		2
000966	110995	ALEMANY	995 ELLSWORTH ST		2
000966	110986	ALEMANY	986 ELLSWORTH ST		2
000966	110564	ALEMANY	564 ALEMANY BLVD		2
000966	110855	ALEMANY	855 ELLSWORTH ST		2
000966	110817	ALEMANY	817 ELLSWORTH ST		1
000966	110546	ALEMANY	546 ALEMANY BLVD		3
000966	110566	ALEMANY	566 ALEMANY BLVD		2
000966	110512	ALEMANY	512 ALEMANY BLVD		3
000966	110906	ALEMANY	906 ELLSWORTH ST		2
000966	110922	ALEMANY	922 ELLSWORTH ST		2
000966	110959	ALEMANY	959 ELLSWORTH ST		2
000966	10085	HOLLY COURTS	85 Patton		2
000966	10102	HOLLY COURTS	102 APPLETON		1
000966	10104	HOLLY COURTS	104 APPLETON		1
000966	10106	HOLLY COURTS	106 APPLETON		2
000966	10108	HOLLY COURTS	108 APPLETON		2
000966	10110	HOLLY COURTS	110 APPLETON		2
000966	10112	HOLLY COURTS	112 APPLETON		2
000966	10114	HOLLY COURTS	114 APPLETON		2
000966	10116	HOLLY COURTS	116 APPLETON		2
000966	10118	HOLLY COURTS	118 APPLETON		2
000966	10120	HOLLY COURTS	120 APPLETON		2
000966	10122	HOLLY COURTS	122 APPLETON		1
000966	10124	HOLLY COURTS	124 APPLETON		1
000966	10126	HOLLY COURTS	126 APPLETON		1
000966	10128	HOLLY COURTS	128 APPLETON		1
000966	10129	HOLLY COURTS	129 HIGHLAND		1

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000966	10130	HOLLY COURTS	130 APPLETON		2
000966	10131	HOLLY COURTS	131 HIGHLAND		2
000966	10132	HOLLY COURTS	132 APPLETON		2
000966	10133	HOLLY COURTS	133 HIGHLAND		2
000966	10134	HOLLY COURTS	134 APPLETON		2
000966	10135	HOLLY COURTS	135 HIGHLAND		2
000966	10136	HOLLY COURTS	136 APPLETON		2
000966	10137	HOLLY COURTS	137 HIGHLAND		2
000966	10138	HOLLY COURTS	138 APPLETON		3
000966	10139	HOLLY COURTS	139 HIGHLAND		2
000966	10140	HOLLY COURTS	140 APPLETON		2
000966	10141	HOLLY COURTS	141 HIGHLAND		2
000966	10142	HOLLY COURTS	142 APPLETON		1
000966	10143	HOLLY COURTS	143 HIGHLAND		2
000966	10144	HOLLY COURTS	144 APPLETON		1
000966	10145	HOLLY COURTS	145 HIGHLAND		1
000966	10146	HOLLY COURTS	146 APPLETON		1
000966	10147	HOLLY COURTS	147 HIGHLAND		1
000966	10148	HOLLY COURTS	148 APPLETON		1
000966	10149	HOLLY COURTS	149 HIGHLAND		2
000966	10150	HOLLY COURTS	150 APPLETON		2
000966	10151	HOLLY COURTS	151 HIGHLAND		2
000966	10152	HOLLY COURTS	152 APPLETON		2
000966	10153	HOLLY COURTS	153 HIGHLAND		2
000966	10154	HOLLY COURTS	154 APPLETON		2
000966	10155	HOLLY COURTS	155 HIGHLAND		2
000966	10156	HOLLY COURTS	156 APPLETON		3
000966	10157	HOLLY COURTS	157 HIGHLAND		2
000966	10158	HOLLY COURTS	158 APPLETON		2
000966	10159	HOLLY COURTS	159 HIGHLAND		1
000966	10160	HOLLY COURTS	160 APPLETON		1
000966	10161	HOLLY COURTS	161 HIGHLAND		1
000966	10162	HOLLY COURTS	162 APPLETON		1
000966	10163	HOLLY COURTS	163 HIGHLAND		2
000966	10164	HOLLY COURTS	164 APPLETON		1
000966	10165	HOLLY COURTS	165 HIGHLAND		2
000966	10197	HOLLY COURTS	197 HIGHLAND		2
000966	10198	HOLLY COURTS	198 APPLETON		1
000966	10199	HOLLY COURTS	199 HIGHLAND		1
000966	10229	HOLLY COURTS	129A HIGHLAND		1
000966	10237	HOLLY COURTS	137A HIGHLAND		2
000966	10245	HOLLY COURTS	145A HIGHLAND		1
000966	10247	HOLLY COURTS	147A HIGHLAND		1
000966	10255	HOLLY COURTS	155A HIGHLAND		3
000966	10259	HOLLY COURTS	159A HIGHLAND		1
000966	10261	HOLLY COURTS	161A HIGHLAND		1
000966	10269	HOLLY COURTS	169A HIGHLAND		2
000966	10271	HOLLY COURTS	171A HIGHLAND		1
000966	10273	HOLLY COURTS	173A HIGHLAND		1
000966	10283	HOLLY COURTS	183A HIGHLAND		1
000966	10285	HOLLY COURTS	185A HIGHLAND		1
000966	10299	HOLLY COURTS	199A HIGHLAND		1
000966	10717	HOLLY COURTS	717 HOLLY PARK		1
000966	10719	HOLLY COURTS	719 HOLLY PARK		1
000966	10725	HOLLY COURTS	725 HOLLY PARK		1
000966	10727	HOLLY COURTS	727 HOLLY PARK		1
000966	10167	HOLLY COURTS	167 HIGHLAND		2
000966	10168	HOLLY COURTS	168 APPLETON		2

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000966	10169	HOLLY COURTS	169 HIGHLAND		3
000966	10170	HOLLY COURTS	170 APPLETON		2
000966	10171	HOLLY COURTS	171 HIGHLAND		1
000966	10172	HOLLY COURTS	172 APPLETON		2
000966	10173	HOLLY COURTS	173 HIGHLAND		1
000966	10174	HOLLY COURTS	174 APPLETON		2
000966	10175	HOLLY COURTS	175 HIGHLAND		2
000966	10176	HOLLY COURTS	176 APPLETON		1
000966	10177	HOLLY COURTS	177 HIGHLAND		2
000966	10178	HOLLY COURTS	178 APPLETON		1
000966	10179	HOLLY COURTS	179 HIGHLAND		2
000966	10180	HOLLY COURTS	180 APPLETON		1
000966	10181	HOLLY COURTS	181 HIGHLAND		2
000966	10182	HOLLY COURTS	182 APPLETON		1
000966	10183	HOLLY COURTS	183 HIGHLAND		1
000966	10184	HOLLY COURTS	184 APPLETON		2
000966	10185	HOLLY COURTS	185 HIGHLAND		1
000966	10186	HOLLY COURTS	186 APPLETON		2
000966	10187	HOLLY COURTS	187 HIGHLAND		2
000966	10188	HOLLY COURTS	188 APPLETON		2
000966	10189	HOLLY COURTS	189 HIGHLAND		2
000966	10190	HOLLY COURTS	190 APPLETON		2
000966	10191	HOLLY COURTS	191 HIGHLAND		2
000966	10192	HOLLY COURTS	192 APPLETON		3
000966	10193	HOLLY COURTS	193 HIGHLAND		2
000966	10194	HOLLY COURTS	194 APPLETON		2
000966	10195	HOLLY COURTS	195 HIGHLAND		3
000966	10001	HOLLY COURTS	1 PATTON		1
000966	10003	HOLLY COURTS	3 PATTON		1
000966	10009	HOLLY COURTS	9 PATTON		2
000966	10015	HOLLY COURTS	15 PATTON		3
000966	10021	HOLLY COURTS	21 PATTON		2
000966	10027	HOLLY COURTS	27 PATTON		2
000966	10033	HOLLY COURTS	33 PATTON		2
000966	10039	HOLLY COURTS	39 PATTON		3
000966	10045	HOLLY COURTS	45 PATTON		3
000966	10051	HOLLY COURTS	51 PATTON		2
000966	10057	HOLLY COURTS	57 PATTON		2
000966	10063	HOLLY COURTS	63 PATTON		2
000966	10069	HOLLY COURTS	69 PATTON		3
000966	10075	HOLLY COURTS	75 PATTON		2
000966	10083	HOLLY COURTS	83 PATTON		1
000966	10196	HOLLY COURTS	196 APPLETON		1
000966	10166	HOLLY COURTS	166 APPLETON		1
276	000966				
000967	20136	POTRERO TERRACE	1090 Connecticut		1
000967	20167	POTRERO TERRACE	1024 CONNECTICUT ST		2
000967	20168	POTRERO TERRACE	1026 CONNECTICUT ST		1
000967	20169	POTRERO TERRACE	1028 CONNECTICUT ST		2
000967	20170	POTRERO TERRACE	950 CONNECTICUT ST		2
000967	20171	POTRERO TERRACE	952 CONNECTICUT ST		2
000967	20172	POTRERO TERRACE	954 CONNECTICUT ST		2
000967	20173	POTRERO TERRACE	956 CONNECTICUT ST		2
000967	20174	POTRERO TERRACE	958 CONNECTICUT ST		2
000967	20175	POTRERO TERRACE	960 CONNECTICUT ST		2
000967	20176	POTRERO TERRACE	962 CONNECTICUT ST		2
000967	20137	POTRERO TERRACE	1054 CONNECTICUT		2

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000967	20156	POTRERO TERRACE	1002 CONNECTICUT		2
000967	20161	POTRERO TERRACE	1012 CONNECTICUT ST		2
000967	20162	POTRERO TERRACE	1014 CONNECTICUT ST		2
000967	20163	POTRERO TERRACE	1016 CONNECTICUT ST		2
000967	20164	POTRERO TERRACE	1018 CONNECTICUT ST		2
000967	20165	POTRERO TERRACE	1020 CONNECTICUT ST		2
000967	20166	POTRERO TERRACE	1022 CONNECTICUT ST		2
000967	20178	POTRERO TERRACE	966 CONNECTICUT ST		2
000967	20179	POTRERO TERRACE	968 CONNECTICUT ST		2
000967	20180	POTRERO TERRACE	970 CONNECTICUT ST		2
000967	20181	POTRERO TERRACE	972 CONNECTICUT ST		2
000967	20182	POTRERO TERRACE	974 CONNECTICUT ST		2
000967	20183	POTRERO TERRACE	976 CONNECTICUT ST		1
000967	20184	POTRERO TERRACE	978 CONNECTICUT ST		2
000967	20185	POTRERO TERRACE	918 CONNECTICUT ST		2
000967	20186	POTRERO TERRACE	920 CONNECTICUT ST		2
000967	20158	POTRERO TERRACE	1006 CONNECTICUT		2
000967	20188	POTRERO TERRACE	924 CONNECTICUT ST		2
000967	20190	POTRERO TERRACE	928 CONNECTICUT ST		2
000967	20191	POTRERO TERRACE	930 CONNECTICUT ST		2
000967	20192	POTRERO TERRACE	932 CONNECTICUT ST		2
000967	20193	POTRERO TERRACE	934 CONNECTICUT ST		2
000967	20194	POTRERO TERRACE	936 CONNECTICUT ST		2
000967	20199	POTRERO TERRACE	946 CONNECTICUT ST		2
000967	20200	POTRERO TERRACE	900 CONNECTICUT ST		2
000967	20201	POTRERO TERRACE	902 CONNECTICUT ST		2
000967	20202	POTRERO TERRACE	904 CONNECTICUT ST		3
000967	20203	POTRERO TERRACE	906 CONNECTICUT ST		3
000967	20204	POTRERO TERRACE	908 CONNECTICUT ST		2
000967	20205	POTRERO TERRACE	910 CONNECTICUT ST		2
000967	20206	POTRERO TERRACE	912 CONNECTICUT ST		2
000967	20207	POTRERO TERRACE	914 CONNECTICUT ST		2
000967	20208	POTRERO TERRACE	1001 WISCONSIN ST		2
000967	20215	POTRERO TERRACE	1015 WISCONSIN ST		2
000967	20216	POTRERO TERRACE	1017 WISCONSIN ST		2
000967	20217	POTRERO TERRACE	1019 WISCONSIN ST		2
000967	20218	POTRERO TERRACE	1021 WISCONSIN ST		2
000967	20219	POTRERO TERRACE	1023 WISCONSIN ST		2
000967	20220	POTRERO TERRACE	1025 WISCONSIN ST		2
000967	20221	POTRERO TERRACE	1027 WISCONSIN ST		1
000967	20222	POTRERO TERRACE	1029 WISCONSIN ST		2
000967	20223	POTRERO TERRACE	901 CONNECTICUT ST		2
000967	20228	POTRERO TERRACE	911 CONNECTICUT ST		2
000967	20229	POTRERO TERRACE	913 CONNECTICUT ST		2
000967	20230	POTRERO TERRACE	915 CONNECTICUT ST		2
000967	20231	POTRERO TERRACE	917 CONNECTICUT ST		2
000967	20232	POTRERO TERRACE	919 CONNECTICUT ST		2
000967	20233	POTRERO TERRACE	921 CONNECTICUT ST		2
000967	20234	POTRERO TERRACE	923 CONNECTICUT ST		2
000967	20235	POTRERO TERRACE	925 CONNECTICUT ST		2
000967	20236	POTRERO TERRACE	927 CONNECTICUT ST		1
000967	20237	POTRERO TERRACE	929 CONNECTICUT ST		2
000967	20238	POTRERO TERRACE	935 CONNECTICUT ST		2
000967	20239	POTRERO TERRACE	937 CONNECTICUT ST		2
000967	20240	POTRERO TERRACE	939 CONNECTICUT ST		2
000967	20241	POTRERO TERRACE	941 CONNECTICUT ST		2
000967	20242	POTRERO TERRACE	943 CONNECTICUT ST		2
000967	20243	POTRERO TERRACE	945 CONNECTICUT ST		2

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000967	20244	POTRERO TERRACE	947 CONNECTICUT ST		2
000967	20245	POTRERO TERRACE	949 CONNECTICUT ST		2
000967	20069	POTRERO TERRACE	1821 25TH ST		2
000967	20070	POTRERO TERRACE	1823 25TH ST		2
000967	20071	POTRERO TERRACE	1825 25TH ST		2
000967	20072	POTRERO TERRACE	1827 25TH ST		1
000967	20074	POTRERO TERRACE	1835 25TH ST		2
000967	20075	POTRERO TERRACE	1837 25TH ST		2
000967	20076	POTRERO TERRACE	1839 25TH ST		3
000967	20077	POTRERO TERRACE	1841 25TH ST		3
000967	20078	POTRERO TERRACE	1843 25TH ST		2
000967	20079	POTRERO TERRACE	1845 25TH ST		3
000967	20081	POTRERO TERRACE	1849 25TH ST		2
000967	20082	POTRERO TERRACE	1851 25TH ST		1
000967	20083	POTRERO TERRACE	1853 25TH ST		2
000967	20084	POTRERO TERRACE	1855 25TH ST		2
000967	20085	POTRERO TERRACE	1901 25TH ST		2
000967	20086	POTRERO TERRACE	1903 25TH ST		2
000967	20087	POTRERO TERRACE	1905 25TH ST		3
000967	20088	POTRERO TERRACE	1907 25TH ST		3
000967	20089	POTRERO TERRACE	1909 25TH ST		2
000967	20090	POTRERO TERRACE	1911 25TH ST		2
000967	20096	POTRERO TERRACE	1870 25TH ST		2
000967	20097	POTRERO TERRACE	1872 25TH ST		2
000967	20098	POTRERO TERRACE	1874 25TH ST		2
000967	20092	POTRERO TERRACE	1915 25TH ST		2
000967	20093	POTRERO TERRACE	1864 25TH ST		2
000967	20100	POTRERO TERRACE	1878 25TH ST		2
000967	20101	POTRERO TERRACE	1880 25TH ST		2
000967	20107	POTRERO TERRACE	1892 25TH ST		2
000967	20108	POTRERO TERRACE	1840 25TH ST		2
000967	20109	POTRERO TERRACE	1842 25TH ST		1
000967	20110	POTRERO TERRACE	1844 25TH ST		2
000967	20111	POTRERO TERRACE	1846 25TH ST		2
000967	20112	POTRERO TERRACE	1848 25TH ST		2
000967	20113	POTRERO TERRACE	1850 25TH ST		2
000967	20114	POTRERO TERRACE	1852 25TH ST		3
000967	20116	POTRERO TERRACE	1856 25TH ST		2
000967	20117	POTRERO TERRACE	1858 25TH ST		3
000967	20118	POTRERO TERRACE	1860 25TH ST		2
000967	20119	POTRERO TERRACE	1820 25TH ST		2
000967	20120	POTRERO TERRACE	1822 25TH ST		2
000967	20121	POTRERO TERRACE	1824 25TH ST		2
000967	20122	POTRERO TERRACE	1826 25TH ST		2
000967	20123	POTRERO TERRACE	1828 25TH ST		2
000967	20124	POTRERO TERRACE	1830 25TH ST		3
000967	20125	POTRERO TERRACE	1832 25TH ST		3
000967	20126	POTRERO TERRACE	1834 25TH ST		2
000967	20127	POTRERO TERRACE	1072 CONNECTICUT		2
000967	20128	POTRERO TERRACE	1074 CONNECTICUT		2
000967	20129	POTRERO TERRACE	1076 CONNECTICUT		3
000967	20130	POTRERO TERRACE	1078 CONNECTICUT		3
000967	20131	POTRERO TERRACE	1080 CONNECTICUT		2
000967	20132	POTRERO TERRACE	1082 CONNECTICUT		3
000967	20133	POTRERO TERRACE	1084 CONNECTICUT		2
000967	20134	POTRERO TERRACE	1086 CONNECTICUT		2
000967	20135	POTRERO TERRACE	1088 CONNECTICUT		2
000967	20103	POTRERO TERRACE	1884 25TH ST		2

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000967	20104	POTRERO TERRACE	1886 25TH ST		2
000967	20105	POTRERO TERRACE	1888 25TH ST		2
000967	20139	POTRERO TERRACE	1058 CONNECTICUT		3
000967	20140	POTRERO TERRACE	1060 CONNECTICUT		3
000967	20141	POTRERO TERRACE	1062 CONNECTICUT		2
000967	20142	POTRERO TERRACE	1064 CONNECTICUT		2
000967	20143	POTRERO TERRACE	1066 CONNECTICUT		2
000967	20145	POTRERO TERRACE	1032 CONNECTICUT		2
000967	20146	POTRERO TERRACE	1034 CONNECTICUT		2
000967	20147	POTRERO TERRACE	1036 CONNECTICUT		3
000967	20148	POTRERO TERRACE	1038 CONNECTICUT		3
000967	20150	POTRERO TERRACE	1042 CONNECTICUT		3
000967	20151	POTRERO TERRACE	1044 CONNECTICUT		2
000967	20152	POTRERO TERRACE	1046 CONNECTICUT		2
000967	20153	POTRERO TERRACE	1048 CONNECTICUT		2
000967	20154	POTRERO TERRACE	1050 CONNECTICUT		2
000967	20001	POTRERO TERRACE	1255 WISCONSIN		2
000967	20002	POTRERO TERRACE	1257 WISCONSIN		2
000967	20003	POTRERO TERRACE	1259 WISCONSIN		3
000967	20004	POTRERO TERRACE	1261 WISCONSIN		3
000967	20005	POTRERO TERRACE	1263 WISCONSIN		2
000967	20006	POTRERO TERRACE	1265 WISCONSIN		3
000967	20007	POTRERO TERRACE	1267 WISCONSIN		2
000967	20008	POTRERO TERRACE	1269 WISCONSIN		2
000967	20009	POTRERO TERRACE	1271 WISCONSIN		1
000967	20010	POTRERO TERRACE	1273 WISCONSIN		2
000967	20011	POTRERO TERRACE	1275 WISCONSIN		2
000967	20012	POTRERO TERRACE	1800 26TH ST		2
000967	20013	POTRERO TERRACE	1802 26TH ST		1
000967	20014	POTRERO TERRACE	1804 26TH ST		2
000967	20015	POTRERO TERRACE	1806 26TH ST		2
000967	20016	POTRERO TERRACE	1808 26TH ST		2
000967	20017	POTRERO TERRACE	1810 26TH ST		2
000967	20018	POTRERO TERRACE	1812 26TH ST		2
000967	20019	POTRERO TERRACE	1814 26TH ST		2
000967	20020	POTRERO TERRACE	1816 26TH ST		2
000967	20062	POTRERO TERRACE	1807 25TH ST		2
000967	20063	POTRERO TERRACE	1809 25TH ST		2
000967	20064	POTRERO TERRACE	1811 25TH ST		2
000967	20065	POTRERO TERRACE	1813 25TH ST		2
000967	20067	POTRERO TERRACE	1817 25TH ST		2
000967	20023	POTRERO TERRACE	1822 26TH ST		2
000967	20024	POTRERO TERRACE	1824 26TH ST		2
000967	20025	POTRERO TERRACE	1826 26TH ST		2
000967	20026	POTRERO TERRACE	1828 26TH ST		2
000967	20027	POTRERO TERRACE	1720 26TH ST		2
000967	20028	POTRERO TERRACE	1722 26TH ST		1
000967	20029	POTRERO TERRACE	1724 26TH ST		2
000967	20030	POTRERO TERRACE	1726 26TH ST		2
000967	20031	POTRERO TERRACE	1728 26TH ST		2
000967	20032	POTRERO TERRACE	1730 26TH ST		2
000967	20033	POTRERO TERRACE	1732 26TH ST		3
000967	20034	POTRERO TERRACE	1734 26TH ST		3
000967	20035	POTRERO TERRACE	1736 26TH ST		2
000967	20036	POTRERO TERRACE	1738 26TH ST		3
000967	20037	POTRERO TERRACE	1740 26TH ST		2
000967	20038	POTRERO TERRACE	1130 CONNECTICUT		2
000967	20039	POTRERO TERRACE	1132 CONNECTICUT		2

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000967	20040	POTRERO TERRACE	1134 CONNECTICUT		3
000967	20041	POTRERO TERRACE	1136 CONNECTICUT ST		3
000967	20042	POTRERO TERRACE	1138 CONNECTICUT ST		2
000967	20043	POTRERO TERRACE	1140 CONNECTICUT ST		3
000967	20044	POTRERO TERRACE	1142 CONNECTICUT ST		2
000967	20045	POTRERO TERRACE	1144 CONNECTICUT ST		2
000967	20046	POTRERO TERRACE	1146 CONNECTICUT ST		2
000967	20047	POTRERO TERRACE	1148 CONNECTICUT ST		2
000967	20048	POTRERO TERRACE	1100 CONNECTICUT ST		2
000967	20049	POTRERO TERRACE	1102 CONNECTICUT ST		2
000967	20050	POTRERO TERRACE	1104 CONNECTICUT ST		3
000967	20051	POTRERO TERRACE	1106 CONNECTICUT ST		3
000967	20052	POTRERO TERRACE	1108 CONNECTICUT ST		2
000967	20053	POTRERO TERRACE	1110 CONNECTICUT ST		3
000967	20054	POTRERO TERRACE	1112 CONNECTICUT ST		2
000967	20055	POTRERO TERRACE	1114 CONNECTICUT ST		2
000967	20056	POTRERO TERRACE	1116 CONNECTICUT ST		1
000967	20057	POTRERO TERRACE	1118 CONNECTICUT ST		2
000967	20058	POTRERO TERRACE	1120 CONNECTICUT ST		2
000967	20059	POTRERO TERRACE	1801 25TH ST		2
000967	20060	POTRERO TERRACE	1803 25TH ST		2
000967	20210	POTRERO TERRACE	1005 WISCONSIN ST		2
000967	20211	POTRERO TERRACE	1007 WISCONSIN ST		2
000967	20212	POTRERO TERRACE	1009 WISCONSIN ST		2
000967	20213	POTRERO TERRACE	1011 WISCONSIN ST		2
000967	20197	POTRERO TERRACE	942 CONNECTICUT ST		2
000967	20225	POTRERO TERRACE	905 CONNECTICUT ST		2
000967	20226	POTRERO TERRACE	907 CONNECTICUT ST		2
000967	20247	POTRERO TERRACE	953 CONNECTICUT ST		2
000967	20248	POTRERO TERRACE	955 CONNECTICUT ST		2
000967	20249	POTRERO TERRACE	957 CONNECTICUT ST		2
000967	20250	POTRERO TERRACE	959 CONNECTICUT ST		2
000967	20251	POTRERO TERRACE	961 CONNECTICUT ST		1
000967	20252	POTRERO TERRACE	963 CONNECTICUT ST		2
000967	20253	POTRERO TERRACE	967 CONNECTICUT ST		2
000967	20254	POTRERO TERRACE	969 CONNECTICUT ST		2
000967	20255	POTRERO TERRACE	971 CONNECTICUT ST		2
000967	20259	POTRERO TERRACE	979 CONNECTICUT ST		2
000967	20260	POTRERO TERRACE	981 CONNECTICUT ST		2
000967	20261	POTRERO TERRACE	983 CONNECTICUT ST		2
000967	20262	POTRERO TERRACE	985 CONNECTICUT ST		2
000967	20263	POTRERO TERRACE	987 CONNECTICUT ST		2
000967	20264	POTRERO TERRACE	989 CONNECTICUT ST		2
000967	20265	POTRERO TERRACE	991 CONNECTICUT ST		2
000967	20266	POTRERO TERRACE	993 CONNECTICUT ST		1
000967	20267	POTRERO TERRACE	995 CONNECTICUT ST		2
000967	20268	POTRERO TERRACE	1001 CONNECTICUT ST		2
000967	20269	POTRERO TERRACE	1003 CONNECTICUT ST		2
000967	20271	POTRERO TERRACE	1007 CONNECTICUT ST		2
000967	20272	POTRERO TERRACE	1009 CONNECTICUT ST		2
000967	20273	POTRERO TERRACE	1011 CONNECTICUT ST		2
000967	20274	POTRERO TERRACE	1013 CONNECTICUT ST		2
000967	20275	POTRERO TERRACE	1015 CONNECTICUT ST		2
000967	20277	POTRERO TERRACE	1019 CONNECTICUT ST		2
000967	20278	POTRERO TERRACE	1021 CONNECTICUT ST		2
000967	20279	POTRERO TERRACE	1023 CONNECTICUT ST		2
000967	20280	POTRERO TERRACE	1025 CONNECTICUT ST		2
000967	20281	POTRERO TERRACE	1027 CONNECTICUT ST		1

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000967	20282	POTRERO TERRACE	1029 CONNECTICUT ST		2
000967	20299	POTRERO TERRACE	1071 CONNECTICUT ST		2
000967	20300	POTRERO TERRACE	1073 CONNECTICUT ST		2
000967	20301	POTRERO TERRACE	1075 CONNECTICUT ST		2
000967	20302	POTRERO TERRACE	1077 CONNECTICUT ST		2
000967	20303	POTRERO TERRACE	1079 CONNECTICUT ST		1
000967	20304	POTRERO TERRACE	1700 25TH ST		2
000967	20305	POTRERO TERRACE	1702 25TH ST		2
000967	20306	POTRERO TERRACE	1704 25TH ST		3
000967	20307	POTRERO TERRACE	1706 25TH ST		3
000967	20308	POTRERO TERRACE	1708 25TH ST		2
000967	20309	POTRERO TERRACE	1710 25TH ST		3
000967	20310	POTRERO TERRACE	1712 25TH ST		2
000967	20311	POTRERO TERRACE	1714 25TH ST		2
000967	20312	POTRERO TERRACE	1716 25TH ST		1
000967	20313	POTRERO TERRACE	1718 25TH ST		2
000967	20314	POTRERO TERRACE	1720 25TH ST		2
000967	20315	POTRERO TERRACE	1620 25TH ST		2
000967	20316	POTRERO TERRACE	1622 25TH ST		2
000967	20317	POTRERO TERRACE	1624 25TH ST		3
000967	20318	POTRERO TERRACE	1626 25TH ST		3
000967	20319	POTRERO TERRACE	1628 25TH ST		2
000967	20320	POTRERO TERRACE	1630 25TH ST		3
000967	20321	POTRERO TERRACE	1632 25TH ST		2
000967	20322	POTRERO TERRACE	1634 25TH ST		2
000967	20323	POTRERO TERRACE	1636 25TH ST		2
000967	20324	POTRERO TERRACE	1638 25TH ST		2
000967	20325	POTRERO TERRACE	174 DAKOTA ST		2
000967	20326	POTRERO TERRACE	176 DAKOTA ST		2
000967	20327	POTRERO TERRACE	178 DAKOTA ST		3
000967	20328	POTRERO TERRACE	180 DAKOTA ST		2
000967	20329	POTRERO TERRACE	182 DAKOTA ST		3
000967	20330	POTRERO TERRACE	184 DAKOTA ST		3
000967	20331	POTRERO TERRACE	186 DAKOTA ST		2
000967	20332	POTRERO TERRACE	188 DAKOTA ST		2
000967	20333	POTRERO TERRACE	190 DAKOTA ST		2
000967	20334	POTRERO TERRACE	192 DAKOTA ST		2
000967	20335	POTRERO TERRACE	194 DAKOTA ST		1
000967	20336	POTRERO TERRACE	140 DAKOTA ST		2
000967	20337	POTRERO TERRACE	142 DAKOTA ST		2
000967	20338	POTRERO TERRACE	144 DAKOTA ST		2
000967	20339	POTRERO TERRACE	146 DAKOTA ST		2
000967	20284	POTRERO TERRACE	1037 CONNECTICUT ST		2
000967	20285	POTRERO TERRACE	1039 CONNECTICUT ST		3
000967	20286	POTRERO TERRACE	1041 CONNECTICUT ST		2
000967	20287	POTRERO TERRACE	1043 CONNECTICUT		3
000967	20288	POTRERO TERRACE	1045 CONNECTICUT ST		3
000967	20289	POTRERO TERRACE	1047 CONNECTICUT ST		2
000967	20290	POTRERO TERRACE	1049 CONNECTICUT ST		2
000967	20291	POTRERO TERRACE	1051 CONNECTICUT ST		2
000967	20292	POTRERO TERRACE	1053 CONNECTICUT ST		2
000967	20293	POTRERO TERRACE	1059 CONNECTICUT ST		2
000967	20342	POTRERO TERRACE	152 DAKOTA ST		2
000967	20343	POTRERO TERRACE	154 DAKOTA ST		2
000967	20344	POTRERO TERRACE	156 DAKOTA ST		2
000967	20345	POTRERO TERRACE	158 DAKOTA ST		2
000967	20346	POTRERO TERRACE	160 DAKOTA ST		2
000967	20347	POTRERO TERRACE	162 DAKOTA ST		2

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000967	20348	POTRERO TERRACE	164 DAKOTA ST		2
000967	20349	POTRERO TERRACE	166 DAKOTA ST		1
000967	20350	POTRERO TERRACE	168 DAKOTA ST		2
000967	20351	POTRERO TERRACE	100 DAKOTA ST		2
000967	20352	POTRERO TERRACE	102 DAKOTA ST		2
000967	20353	POTRERO TERRACE	104 DAKOTA ST		2
000967	20354	POTRERO TERRACE	106 DAKOTA ST		2
000967	20257	POTRERO TERRACE	975 CONNECTICUT ST		2
000967	20296	POTRERO TERRACE	1065 CONNECTICUT ST		2
000967	20297	POTRERO TERRACE	1067 CONNECTICUT ST		3
000967	20357	POTRERO TERRACE	112 DAKOTA ST		2
000967	20358	POTRERO TERRACE	114 DAKOTA ST		2
000967	20359	POTRERO TERRACE	116 DAKOTA ST		2
000967	20360	POTRERO TERRACE	118 DAKOTA ST		2
000967	20361	POTRERO TERRACE	120 DAKOTA ST		2
000967	20367	POTRERO TERRACE	62 DAKOTA ST		2
000967	20368	POTRERO TERRACE	64 DAKOTA ST		2
000967	20369	POTRERO TERRACE	66 DAKOTA ST		2
000967	20370	POTRERO TERRACE	68 DAKOTA ST		2
000967	20371	POTRERO TERRACE	70 DAKOTA ST		2
000967	20372	POTRERO TERRACE	72 DAKOTA ST		2
000967	20373	POTRERO TERRACE	74 DAKOTA ST		2
000967	20374	POTRERO TERRACE	76 DAKOTA ST		2
000967	20375	POTRERO TERRACE	78 DAKOTA ST		2
000967	20376	POTRERO TERRACE	80 DAKOTA ST		2
000967	20378	POTRERO TERRACE	84 DAKOTA ST		2
000967	20379	POTRERO TERRACE	86 DAKOTA ST		1
000967	20380	POTRERO TERRACE	88 DAKOTA ST		2
000967	20381	POTRERO TERRACE	30 DAKOTA ST		2
000967	20382	POTRERO TERRACE	32 DAKOTA ST		2
000967	20383	POTRERO TERRACE	34 DAKOTA ST		3
000967	20384	POTRERO TERRACE	36 DAKOTA ST		2
000967	20385	POTRERO TERRACE	38 DAKOTA ST		3
000967	20386	POTRERO TERRACE	40 DAKOTA ST		3
000967	20387	POTRERO TERRACE	42 DAKOTA ST		2
000967	20389	POTRERO TERRACE	46 DAKOTA ST		2
000967	20390	POTRERO TERRACE	48 DAKOTA ST		2
000967	20391	POTRERO TERRACE	2 DAKOTA ST		2
000967	20392	POTRERO TERRACE	4 DAKOTA ST		2
000967	20393	POTRERO TERRACE	6 DAKOTA ST		3
000967	20394	POTRERO TERRACE	8 DAKOTA ST		2
000967	20395	POTRERO TERRACE	10 DAKOTA ST		3
000967	20396	POTRERO TERRACE	12 DAKOTA ST		3
000967	20397	POTRERO TERRACE	14 DAKOTA ST		2
000967	20398	POTRERO TERRACE	16 DAKOTA ST		2
000967	20363	POTRERO TERRACE	124 DAKOTA ST		2
000967	20364	POTRERO TERRACE	126 DAKOTA ST		1
000967	20365	POTRERO TERRACE	128 DAKOTA ST		2
000967	20400	POTRERO TERRACE	20 DAKOTA ST		2
000967	20401	POTRERO TERRACE	22 DAKOTA ST		1
000967	20403	POTRERO TERRACE	3 DAKOTA ST		2
000967	20404	POTRERO TERRACE	5 DAKOTA ST		3
000967	20405	POTRERO TERRACE	7 DAKOTA ST		3
000967	20406	POTRERO TERRACE	9 DAKOTA ST		2
000967	20407	POTRERO TERRACE	11 DAKOTA ST		2
000967	20408	POTRERO TERRACE	13 DAKOTA ST		2
000967	20409	POTRERO TERRACE	15 DAKOTA ST		2
000967	20410	POTRERO TERRACE	21 DAKOTA ST		2

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000967	20412	POTRERO TERRACE	25 DAKOTA ST		2
000967	20413	POTRERO TERRACE	27 DAKOTA ST		2
000967	20414	POTRERO TERRACE	29 DAKOTA ST		2
000967	20415	POTRERO TERRACE	31 DAKOTA ST		2
000967	20416	POTRERO TERRACE	33 DAKOTA ST		2
000967	20417	POTRERO TERRACE	35 DAKOTA ST		2
000967	20418	POTRERO TERRACE	37 DAKOTA ST		2
000967	20419	POTRERO TERRACE	39 DAKOTA ST		2
000967	20420	POTRERO TERRACE	41 DAKOTA ST		2
000967	20421	POTRERO TERRACE	43 DAKOTA ST		2
000967	20422	POTRERO TERRACE	45 DAKOTA ST		2
000967	20423	POTRERO TERRACE	47 DAKOTA ST		1
000967	20424	POTRERO TERRACE	49 DAKOTA ST		2
000967	20425	POTRERO TERRACE	55 DAKOTA ST		2
000967	20426	POTRERO TERRACE	57 DAKOTA ST		2
000967	20427	POTRERO TERRACE	59 DAKOTA ST		2
000967	20428	POTRERO TERRACE	61 DAKOTA ST		2
000967	20429	POTRERO TERRACE	63 DAKOTA ST		2
000967	20430	POTRERO TERRACE	65 DAKOTA ST		2
000967	20441	POTRERO TERRACE	103 DAKOTA ST		2
000967	20442	POTRERO TERRACE	105 DAKOTA ST		2
000967	20443	POTRERO TERRACE	107 DAKOTA ST		2
000967	20444	POTRERO TERRACE	109 DAKOTA ST		2
000967	20445	POTRERO TERRACE	111 DAKOTA ST		2
000967	20446	POTRERO TERRACE	113 DAKOTA ST		2
000967	20447	POTRERO TERRACE	115 DAKOTA ST		2
000967	20448	POTRERO TERRACE	117 DAKOTA ST		2
000967	20449	POTRERO TERRACE	119 DAKOTA ST		2
000967	20450	POTRERO TERRACE	121 DAKOTA ST		2
000967	20435	POTRERO TERRACE	75 DAKOTA ST		2
000967	20436	POTRERO TERRACE	77 DAKOTA ST		2
000967	20437	POTRERO TERRACE	79 DAKOTA ST		2
000967	20438	POTRERO TERRACE	81 DAKOTA ST		1
000967	20439	POTRERO TERRACE	83 DAKOTA ST		2
000967	20432	POTRERO TERRACE	69 DAKOTA ST		2
000967	20452	POTRERO TERRACE	125 DAKOTA ST		2
000967	20454	POTRERO TERRACE	129 DAKOTA ST		2
000967	20455	POTRERO TERRACE	145 DAKOTA ST		2
000967	20456	POTRERO TERRACE	147 DAKOTA ST		2
000967	20457	POTRERO TERRACE	149 DAKOTA ST		2
000967	20459	POTRERO TERRACE	153 DAKOTA ST		2
000967	20460	POTRERO TERRACE	155 DAKOTA ST		2
000967	20461	POTRERO TERRACE	157 DAKOTA ST		2
000967	20462	POTRERO TERRACE	159 DAKOTA ST		2
000967	20463	POTRERO TERRACE	161 DAKOTA ST		2
000967	20464	POTRERO TERRACE	163 DAKOTA ST		2
000967	20466	POTRERO TERRACE	167 DAKOTA ST		2
000967	20467	POTRERO TERRACE	169 DAKOTA ST		2
000967	20468	POTRERO TERRACE	171 DAKOTA ST		2
000967	20469	POTRERO TERRACE	173 DAKOTA ST		3
000967	20341	POTRERO TERRACE	150 DAKOTA ST		2
000967	20159	POTRERO TERRACE	1008 CONNECTICUT		2
000967	20160	POTRERO TERRACE	1010 CONNECTICUT ST		2
000967	20189	POTRERO TERRACE	926 CONNECTICUT ST		2
000967	20195	POTRERO TERRACE	938 CONNECTICUT ST		2
000967	20138	POTRERO TERRACE	1056 CONNECTICUT		2
000967	20209	POTRERO TERRACE	1003 WISCONSIN ST		2
000967	20155	POTRERO TERRACE	1000 CONNECTICUT		2

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000967	20102	POTRERO TERRACE	1882 25TH ST		2
000967	20099	POTRERO TERRACE	1876 25TH ST		2
000967	20091	POTRERO TERRACE	1913 25TH ST		2
000967	20080	POTRERO TERRACE	1847 25TH ST		2
000967	20068	POTRERO TERRACE	1819 25TH ST		2
000967	20022	POTRERO TERRACE	1820 26TH ST		2
000967	20066	POTRERO TERRACE	1815 25TH ST		2
000967	20095	POTRERO TERRACE	1868 25TH ST		2
000967	20402	POTRERO TERRACE	1 DAKOTA ST		2
000967	20366	POTRERO TERRACE	60 DAKOTA ST		2
000967	20411	POTRERO TERRACE	23 DAKOTA ST		2
000967	20388	POTRERO TERRACE	44 DAKOTA ST		2
000967	20377	POTRERO TERRACE	82 DAKOTA ST		2
000967	20355	POTRERO TERRACE	108 DAKOTA ST		2
000967	20356	POTRERO TERRACE	110 DAKOTA ST		2
000967	20294	POTRERO TERRACE	1061 CONNECTICUT ST		2
000967	20340	POTRERO TERRACE	148 DAKOTA ST		2
000967	20256	POTRERO TERRACE	973 CONNECTICUT ST		2
000967	20198	POTRERO TERRACE	944 CONNECTICUT ST		1
000967	20214	POTRERO TERRACE	1013 WISCONSIN ST		2
000967	20465	POTRERO TERRACE	165 DAKOTA ST		2
000967	20433	POTRERO TERRACE	71 DAKOTA ST		2
000967	20453	POTRERO TERRACE	127 DAKOTA ST		1
000967	20440	POTRERO TERRACE	101 DAKOTA ST		2
000967	20451	POTRERO TERRACE	123 DAKOTA ST		2
000967	20431	POTRERO TERRACE	67 DAKOTA ST		2
000967	20458	POTRERO TERRACE	151 DAKOTA ST		2
000967	20227	POTRERO TERRACE	909 CONNECTICUT ST		2
000967	20283	POTRERO TERRACE	1035 CONNECTICUT ST		2
000967	20276	POTRERO TERRACE	1017 CONNECTICUT ST		2
000967	20270	POTRERO TERRACE	1005 CONNECTICUT ST		2
000967	20295	POTRERO TERRACE	1063 CONNECTICUT ST		3
000967	20362	POTRERO TERRACE	122 DAKOTA ST		2
000967	20298	POTRERO TERRACE	1069 CONNECTICUT ST		3
000967	20258	POTRERO TERRACE	977 CONNECTICUT ST		2
000967	20399	POTRERO TERRACE	18 DAKOTA ST		2
000967	20061	POTRERO TERRACE	1805 25TH ST		2
000967	20021	POTRERO TERRACE	1818 26TH ST		2
000967	20073	POTRERO TERRACE	1829 25TH ST		2
000967	20094	POTRERO TERRACE	1866 25TH ST		1
000967	20115	POTRERO TERRACE	1854 25TH ST		3
000967	20149	POTRERO TERRACE	1040 CONNECTICUT		2
000967	20144	POTRERO TERRACE	1068 CONNECTICUT		2
000967	20106	POTRERO TERRACE	1890 25TH ST		2
000967	20224	POTRERO TERRACE	903 CONNECTICUT ST		2
000967	20246	POTRERO TERRACE	951 CONNECTICUT ST		2
000967	20177	POTRERO TERRACE	964 CONNECTICUT ST		2
000967	20196	POTRERO TERRACE	940 CONNECTICUT ST		2
000967	20187	POTRERO TERRACE	922 CONNECTICUT ST		2
000967	20157	POTRERO TERRACE	1004 CONNECTICUT		2
000967	20434	POTRERO TERRACE	73 DAKOTA ST		2
469	000967				
000971	80164	POTRERO ANNEX	79 WATCHMAN WAY		2
000971	80023	POTRERO ANNEX	51 TURNER TERRACE		1
000971	80124	POTRERO ANNEX	911 MISSOURI ST.		2
000971	80001	POTRERO ANNEX	1 TURNER TERRACE		1
000971	80006	POTRERO ANNEX	11 TURNER TERRACE		1

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000971	80007	POTRERO ANNEX	15 TURNER TERRACE		1
000971	80014	POTRERO ANNEX	29 TURNER TERRACE		1
000971	80044	POTRERO ANNEX	54 TURNER TERRACE		1
000971	80045	POTRERO ANNEX	85 TURNER TERRACE		1
000971	80046	POTRERO ANNEX	87 TURNER TERRACE		1
000971	80047	POTRERO ANNEX	89 TURNER TERRACE		1
000971	80048	POTRERO ANNEX	91 TURNER TERRACE		1
000971	80049	POTRERO ANNEX	93 TURNER TERRACE		1
000971	80050	POTRERO ANNEX	95 TURNER TERRACE		1
000971	80083	POTRERO ANNEX	751 MISSOURI		1
000971	80030	POTRERO ANNEX	65 TURNER TERRACE		1
000971	80031	POTRERO ANNEX	71 TURNER TERRACE		1
000971	80032	POTRERO ANNEX	73 TURNER TERRACE		1
000971	80033	POTRERO ANNEX	75 TURNER TERRACE		1
000971	80034	POTRERO ANNEX	77 TURNER TERRACE		1
000971	80035	POTRERO ANNEX	79 TURNER TERRACE		1
000971	80036	POTRERO ANNEX	81 TURNER TERRACE		1
000971	80107	POTRERO ANNEX	851 MISSOURI ST.		1
000971	80108	POTRERO ANNEX	853 MISSOURI ST		4
000971	80109	POTRERO ANNEX	855 MISSOURI ST		4
000971	80110	POTRERO ANNEX	857 MISSOURI ST		4
000971	80111	POTRERO ANNEX	859 MISSOURI ST		4
000971	80114	POTRERO ANNEX	873 MISSOURI ST		5
000971	80117	POTRERO ANNEX	879 MISSOURI ST		5
000971	80119	POTRERO ANNEX	901 MISSOURI ST		1
000971	80120	POTRERO ANNEX	903 MISSOURI ST		2
000971	80121	POTRERO ANNEX	905 MISSOURI ST		2
000971	80122	POTRERO ANNEX	907 MISSOURI ST		3
000971	80123	POTRERO ANNEX	909 MISSOURI ST		3
000971	80037	POTRERO ANNEX	40 TURNER TERRACE		1
000971	80038	POTRERO ANNEX	42 TURNER TERRACE		2
000971	80039	POTRERO ANNEX	44 TURNER TERRACE		2
000971	80040	POTRERO ANNEX	46 TURNER TERRACE		3
000971	80041	POTRERO ANNEX	48 TURNER TERRACE		3
000971	80042	POTRERO ANNEX	50 TURNER TERRACE		2
000971	80043	POTRERO ANNEX	52 TURNER TERRACE		2
000971	80084	POTRERO ANNEX	753 MISSOURI ST		3
000971	80085	POTRERO ANNEX	755 MISSOURI ST		3
000971	80086	POTRERO ANNEX	757 MISSOURI ST		3
000971	80087	POTRERO ANNEX	759 MISSOURI ST		3
000971	80088	POTRERO ANNEX	761 MISSOURI ST		3
000971	80089	POTRERO ANNEX	763 MISSOURI ST		3
000971	80090	POTRERO ANNEX	765 MISSOURI ST		2
000971	80091	POTRERO ANNEX	771 MISSOURI ST		1
000971	80092	POTRERO ANNEX	773 MISSOURI ST		2
000971	80093	POTRERO ANNEX	775 MISSOURI ST		2
000971	80094	POTRERO ANNEX	777 MISSOURI ST		3
000971	80095	POTRERO ANNEX	779 MISSOURI ST		3
000971	80096	POTRERO ANNEX	781 MISSOURI ST		2
000971	80097	POTRERO ANNEX	783 MISSOURI ST		4
000971	80100	POTRERO ANNEX	803 MISSOURI ST		5
000971	80101	POTRERO ANNEX	805 MISSOURI ST		3
000971	80102	POTRERO ANNEX	807 MISSOURI ST		3
000971	80103	POTRERO ANNEX	809 MISSOURI ST		3
000971	80104	POTRERO ANNEX	811 MISSOURI ST		3
000971	80105	POTRERO ANNEX	815 MISSOURI ST		5
000971	80051	POTRERO ANNEX	700 MISSOURI ST		2
000971	80052	POTRERO ANNEX	702 MISSOURI ST		3

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000971	80053	POTRERO ANNEX	704 MISSOURI ST		3
000971	80054	POTRERO ANNEX	706 MISSOURI ST		3
000971	80055	POTRERO ANNEX	708 MISSOURI ST		3
000971	80056	POTRERO ANNEX	710 MISSOURI ST		3
000971	80057	POTRERO ANNEX	712 MISSOURI ST		3
000971	80058	POTRERO ANNEX	714 MISSOURI ST		2
000971	80059	POTRERO ANNEX	701 MISSOURI ST		1
000971	80060	POTRERO ANNEX	703 MISSOURI ST		2
000971	80061	POTRERO ANNEX	705 MISSOURI ST		2
000971	80062	POTRERO ANNEX	707 MISSOURI ST		3
000971	80063	POTRERO ANNEX	709 MISSOURI ST		3
000971	80064	POTRERO ANNEX	711 MISSOURI ST		2
000971	80065	POTRERO ANNEX	715 MISSOURI ST		2
000971	80067	POTRERO ANNEX	730 MISSOURI ST		2
000971	80068	POTRERO ANNEX	732 MISSOURI ST		3
000971	80069	POTRERO ANNEX	734 MISSOURI ST		3
000971	80070	POTRERO ANNEX	736 MISSOURI ST		3
000971	80071	POTRERO ANNEX	738 MISSOURI ST		3
000971	80072	POTRERO ANNEX	740 MISSOURI ST		3
000971	80073	POTRERO ANNEX	742 MISSOURI ST		3
000971	80074	POTRERO ANNEX	744 MISSOURI ST		2
000971	80076	POTRERO ANNEX	762 MISSOURI ST		5
000971	80077	POTRERO ANNEX	764 MISSOURI ST		3
000971	80078	POTRERO ANNEX	766 MISSOURI ST		3
000971	80016	POTRERO ANNEX	33 TURNER TERRACE		4
000971	80017	POTRERO ANNEX	35 TURNER TERRACE		2
000971	80018	POTRERO ANNEX	37 TURNER TERRACE		3
000971	80019	POTRERO ANNEX	39 TURNER TERRACE		3
000971	80020	POTRERO ANNEX	41 TURNER TERRACE		2
000971	80021	POTRERO ANNEX	43 TURNER TERRACE		4
000971	80025	POTRERO ANNEX	55 TURNER TERRACE		2
000971	80026	POTRERO ANNEX	57 TURNER TERRACE		3
000971	80027	POTRERO ANNEX	59 TURNER TERRACE		3
000971	80028	POTRERO ANNEX	61 TURNER TERRACE		2
000971	80029	POTRERO ANNEX	63 TURNER TERRACE		2
000971	80010	POTRERO ANNEX	21 TURNER TERRACE		3
000971	80011	POTRERO ANNEX	23 TURNER TERRACE		3
000971	80012	POTRERO ANNEX	25 TURNER TERRACE		2
000971	80013	POTRERO ANNEX	27 TURNER TERRACE		2
000971	80002	POTRERO ANNEX	3 TURNER TERRACE		1
000971	80003	POTRERO ANNEX	5 TURNER TERRACE		1
000971	80004	POTRERO ANNEX	7 TURNER TERRACE		2
000971	80005	POTRERO ANNEX	9 TURNER TERRACE		1
000971	80125	POTRERO ANNEX	915 MISSOURI ST		4
000971	80127	POTRERO ANNEX	1 WATCHMAN WAY		1
000971	80128	POTRERO ANNEX	3 WATCHMAN WAY		4
000971	80130	POTRERO ANNEX	7 WATCHMAN WAY		4
000971	80131	POTRERO ANNEX	9 WATCHMAN WAY		4
000971	80132	POTRERO ANNEX	11 WATCHMAN WAY		1
000971	80133	POTRERO ANNEX	15 WATCHMAN WAY		1
000971	80134	POTRERO ANNEX	17 WATCHMAN WAY		2
000971	80135	POTRERO ANNEX	19 WATCHMAN WAY		2
000971	80136	POTRERO ANNEX	21 WATCHMAN WAY		3
000971	80137	POTRERO ANNEX	23 WATCHMAN WAY		3
000971	80138	POTRERO ANNEX	25 WATCHMAN WAY		2
000971	80139	POTRERO ANNEX	27 WATCHMAN WAY		2
000971	80142	POTRERO ANNEX	33 WATCHMAN WAY		2
000971	80143	POTRERO ANNEX	35 WATCHMAN WAY		2

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000971	80144	POTRERO ANNEX	37 WATCHMAN WAY		3
000971	80145	POTRERO ANNEX	39 WATCHMAN WAY		3
000971	80146	POTRERO ANNEX	41 WATCHMAN WAY		2
000971	80147	POTRERO ANNEX	43 WATCHMAN WAY		4
000971	80149	POTRERO ANNEX	47 WATCHMAN WAY		1
000971	80150	POTRERO ANNEX	49 WATCHMAN WAY		2
000971	80151	POTRERO ANNEX	51 WATCHMAN WAY		2
000971	80152	POTRERO ANNEX	53 WATCHMAN WAY		3
000971	80153	POTRERO ANNEX	55 WATCHMAN WAY		3
000971	80154	POTRERO ANNEX	57 WATCHMAN WAY		2
000971	80155	POTRERO ANNEX	59 WATCHMAN WAY		2
000971	80156	POTRERO ANNEX	61 WATCHMAN WAY		1
000971	80157	POTRERO ANNEX	65 WATCHMAN WAY		2
000971	80158	POTRERO ANNEX	67 WATCHMAN WAY		3
000971	80159	POTRERO ANNEX	69 WATCHMAN WAY		3
000971	80160	POTRERO ANNEX	71 WATCHMAN WAY		3
000971	80161	POTRERO ANNEX	73 WATCHMAN WAY		3
000971	80162	POTRERO ANNEX	75 WATCHMAN WAY		3
000971	80163	POTRERO ANNEX	77 WATCHMAN WAY		3
000971	80080	POTRERO ANNEX	770 MISSOURI ST		3
000971	80081	POTRERO ANNEX	772 MISSOURI ST		3
000971	80082	POTRERO ANNEX	774 MISSOURI ST		2
000971	80166	POTRERO ANNEX	85 WATCHMAN WAY		4
000971	80167	POTRERO ANNEX	87 WATCHMAN WAY		2
000971	80168	POTRERO ANNEX	89 WATCHMAN WAY		3
000971	80169	POTRERO ANNEX	91 WATCHMAN WAY		3
000971	80170	POTRERO ANNEX	93 WATCHMAN WAY		2
000971	80171	POTRERO ANNEX	95 WATCHMAN WAY		2
000971	80172	POTRERO ANNEX	97 WATCHMAN WAY		1
000971	80024	POTRERO ANNEX	53 TURNER TERRACE		2
000971	80140	POTRERO ANNEX	29 WATCHMAN WAY		1
000971	80141	POTRERO ANNEX	31 WATCHMAN WAY		1
000971	80008	POTRERO ANNEX	17 TURNER TERRACE		2
000971	80009	POTRERO ANNEX	19 TURNER TERRACE		2
000971	80079	POTRERO ANNEX	768 MISSOURI ST		3
156	000971				
000974	150173	HUNTERS VIEW	207 WEST POINT RD		4
000974	150286	HUNTERS VIEW	112 MIDDLE POINT RD		4
000974	150287	HUNTERS VIEW	114 MIDDLE POINT RD		4
000974	150187	HUNTERS VIEW	223 WEST POINT RD		3
000974	150189	HUNTERS VIEW	227 WEST POINT RD		3
000974	150190	HUNTERS VIEW	229 WEST POINT RD		3
000974	150200	HUNTERS VIEW	249 WEST POINT RD		2
000974	150202	HUNTERS VIEW	210 WEST POINT RD		4
000974	150209	HUNTERS VIEW	226 WEST POINT RD		3
000974	150243	HUNTERS VIEW	35 WILLS ST		3
000974	150244	HUNTERS VIEW	37 WILLS ST		3
000974	150240	HUNTERS VIEW	29 WILLS ST		3
000974	150199	HUNTERS VIEW	247 WEST POINT RD.		3
000974	150285	HUNTERS VIEW	110 MIDDLE POINT RD		4
000974	150191	HUNTERS VIEW	231 WEST POINT RD		3
000974	150194	HUNTERS VIEW	237 WEST POINT RD		3
000974	150195	HUNTERS VIEW	239 WEST POINT RD		3
000974	150196	HUNTERS VIEW	241 WEST POINT RD		2
000974	150075	HUNTERS VIEW	118 WEST POINT RD		4
000974	150076	HUNTERS VIEW	120 WEST POINT RD		3
000974	150077	HUNTERS VIEW	122 WEST POINT RD		3

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000974	150106	HUNTERS VIEW	182 WEST POINT RD		3
000974	150107	HUNTERS VIEW	184 WEST POINT RD		3
000974	150170	HUNTERS VIEW	201 WEST POINT RD		4
000974	150171	HUNTERS VIEW	203 WEST POINT RD		4
000974	150172	HUNTERS VIEW	205 WEST POINT RD		4
000974	150188	HUNTERS VIEW	225 WEST POINT RD		3
000974	150186	HUNTERS VIEW	221 WEST POINT RD		3
000974	150204	HUNTERS VIEW	214 WEST POINT RD		3
000974	150205	HUNTERS VIEW	216 WEST POINT RD		4
000974	150206	HUNTERS VIEW	220 WEST POINT RD		4
000974	150207	HUNTERS VIEW	222 WEST POINT RD		4
000974	150212	HUNTERS VIEW	232 WEST POINT RD		3
000974	150213	HUNTERS VIEW	234 WEST POINT RD		3
000974	150214	HUNTERS VIEW	236 WEST POINT RD		4
000974	150229	HUNTERS VIEW	57 HARE ST		4
000974	150230	HUNTERS VIEW	59 HARE ST		4
000974	150231	HUNTERS VIEW	11 WILLS ST		2
000974	150232	HUNTERS VIEW	13 WILLS ST		2
000974	150233	HUNTERS VIEW	15 WILLS ST		3
000974	150234	HUNTERS VIEW	17 WILLS ST		4
000974	150235	HUNTERS VIEW	19 WILLS ST		2
000974	150236	HUNTERS VIEW	21 WILLS ST		2
000974	150237	HUNTERS VIEW	23 WILLS ST		3
000974	150238	HUNTERS VIEW	25 WILLS ST		4
000974	150288	HUNTERS VIEW	116 MIDDLE POINT RD		4
000974	150289	HUNTERS VIEW	120 MIDDLE POINT RD		3
000974	150290	HUNTERS VIEW	122 MIDDLE POINT RD		3
000974	150291	HUNTERS VIEW	124 MIDDLE POINT RD		3
000974	150292	HUNTERS VIEW	126 MIDDLE POINT RD		3
000974	150293	HUNTERS VIEW	128 MIDDLE POINT RD		3
000974	150294	HUNTERS VIEW	130 MIDDLE POINT RD		3
000974	150295	HUNTERS VIEW	140 MIDDLE POINT RD		4
000974	150296	HUNTERS VIEW	142 MIDDLE POINT RD		5
000974	150297	HUNTERS VIEW	144 MIDDLE POINT RD		5
000974	150298	HUNTERS VIEW	146 MIDDLE POINT RD		4
000974	150299	HUNTERS VIEW	148 MIDDLE POINT RD		5
000974	150300	HUNTERS VIEW	150 MIDDLE POINT RD		5
000974	150301	HUNTERS VIEW	31 MIDDLE POINT RD		4
000974	150302	HUNTERS VIEW	33 MIDDLE POINT RD		4
000974	150303	HUNTERS VIEW	35 MIDDLE POINT RD		4
000974	150304	HUNTERS VIEW	37 MIDDLE POINT RD		4
000974	150305	HUNTERS VIEW	41 MIDDLE POINT RD		2
000974	150072	HUNTERS VIEW	112 WEST POINT RD		4
000974	150073	HUNTERS VIEW	114 WEST POINT RD		3
000974	150079	HUNTERS VIEW	126 WEST POINT RD		3
000974	150080	HUNTERS VIEW	128 WEST POINT RD		1
000974	150082	HUNTERS VIEW	132 WEST POINT RD		3
000974	150083	HUNTERS VIEW	134 WEST POINT RD		3
000974	150084	HUNTERS VIEW	136 WEST POINT RD		3
000974	150085	HUNTERS VIEW	138 WEST POINT RD		3
000974	150086	HUNTERS VIEW	142 WEST POINT RD		5
000974	150087	HUNTERS VIEW	144 WEST POINT RD		5
000974	150088	HUNTERS VIEW	146 WEST POINT RD		4
000974	150090	HUNTERS VIEW	150 WEST POINT RD		4
000974	150091	HUNTERS VIEW	152 WEST POINT RD		4
000974	150092	HUNTERS VIEW	154 WEST POINT RD		3
000974	150093	HUNTERS VIEW	156 WEST POINT RD		3
000974	150094	HUNTERS VIEW	158 WEST POINT RD		3

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000974	150095	HUNTERS VIEW	160 WEST POINT RD		3
000974	150096	HUNTERS VIEW	162 WEST POINT RD		1
000974	150097	HUNTERS VIEW	164 WEST POINT RD		3
000974	150098	HUNTERS VIEW	166 WEST POINT RD		3
000974	150099	HUNTERS VIEW	168 WEST POINT RD		3
000974	150100	HUNTERS VIEW	170 WEST POINT RD		3
000974	150101	HUNTERS VIEW	172 WEST POINT RD		1
000974	150102	HUNTERS VIEW	174 WEST POINT RD		5
000974	150103	HUNTERS VIEW	176 WEST POINT RD		5
000974	150104	HUNTERS VIEW	178 WEST POINT RD		3
000974	150307	HUNTERS VIEW	45 MIDDLE POINT RD		3
000974	150308	HUNTERS VIEW	47 MIDDLE POINT RD		3
000974	150309	HUNTERS VIEW	49 MIDDLE POINT RD		2
000974	150310	HUNTERS VIEW	51 MIDDLE POINT RD		2
000974	150311	HUNTERS VIEW	53 MIDDLE POINT RD		3
000974	150312	HUNTERS VIEW	55 MIDDLE POINT RD		3
000974	150313	HUNTERS VIEW	57 MIDDLE POINT RD		2
000974	150314	HUNTERS VIEW	59 MIDDLE POINT RD		2
000974	150315	HUNTERS VIEW	61 MIDDLE POINT RD		3
000974	150316	HUNTERS VIEW	63 MIDDLE POINT RD		3
000974	150317	HUNTERS VIEW	65 MIDDLE POINT RD		2
000974	150318	HUNTERS VIEW	67 MIDDLE POINT RD		2
000974	150319	HUNTERS VIEW	69 MIDDLE POINT RD		3
000974	150320	HUNTERS VIEW	71 MIDDLE POINT RD		3
000974	150321	HUNTERS VIEW	73 MIDDLE POINT RD		2
000974	150322	HUNTERS VIEW	75 MIDDLE POINT RD		2
000974	150323	HUNTERS VIEW	77 MIDDLE POINT RD		3
000974	150324	HUNTERS VIEW	79 MIDDLE POINT RD		3
000974	150325	HUNTERS VIEW	81 MIDDLE POINT RD		2
000974	150326	HUNTERS VIEW	83 MIDDLE POINT RD		2
000974	150327	HUNTERS VIEW	85 MIDDLE POINT RD		3
000974	150328	HUNTERS VIEW	87 MIDDLE POINT RD		3
000974	150329	HUNTERS VIEW	93 MIDDLE POINT RD		4
000974	150330	HUNTERS VIEW	95 MIDDLE POINT RD		4
000974	150331	HUNTERS VIEW	97 MIDDLE POINT RD		4
000974	150332	HUNTERS VIEW	99 MIDDLE POINT RD		4
000974	150333	HUNTERS VIEW	119 MIDDLE POINT RD		3
000974	150334	HUNTERS VIEW	121 MIDDLE POINT RD		3
000974	150335	HUNTERS VIEW	123 MIDDLE POINT RD		2
000974	150336	HUNTERS VIEW	125 MIDDLE POINT RD		2
000974	150337	HUNTERS VIEW	127 MIDDLE POINT RD		3
000974	150338	HUNTERS VIEW	129 MIDDLE POINT RD		3
000974	150339	HUNTERS VIEW	131 MIDDLE POINT RD		4
000974	150340	HUNTERS VIEW	133 MIDDLE POINT RD		2
000974	150341	HUNTERS VIEW	135 MIDDLE POINT RD		2
000974	150342	HUNTERS VIEW	137 MIDDLE POINT RD		3
000974	150343	HUNTERS VIEW	139 MIDDLE POINT RD		3
000974	150344	HUNTERS VIEW	141 MIDDLE POINT RD		2
000974	150345	HUNTERS VIEW	143 MIDDLE POINT RD		2
000974	150346	HUNTERS VIEW	145 MIDDLE POINT RD		3
000974	150347	HUNTERS VIEW	147 MIDDLE POINT RD		3
000974	150348	HUNTERS VIEW	149 MIDDLE POINT RD		4
000974	150349	HUNTERS VIEW	151 MIDDLE POINT RD		2
000974	150350	HUNTERS VIEW	153 MIDDLE POINT RD		2
000974	150247	HUNTERS VIEW	43 WILLS ST		3
000974	150248	HUNTERS VIEW	45 WILLS ST		3
000974	150249	HUNTERS VIEW	47 WILLS ST		3
000974	150250	HUNTERS VIEW	49 WILLS ST		3

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000974	150210	HUNTERS VIEW	228 WEST POINT RD		2
000974	150211	HUNTERS VIEW	230 WEST POINT RD		2
000974	150203	HUNTERS VIEW	212 WEST POINT RD		3
000974	150241	HUNTERS VIEW	31 WILLS ST		2
000974	150242	HUNTERS VIEW	33 WILLS ST		2
000974	150306	HUNTERS VIEW	43 MIDDLE POINT RD		2
000974	150239	HUNTERS VIEW	27 WILLS ST		3
000974	150208	HUNTERS VIEW	224 WEST POINT RD		3
000974	150078	HUNTERS VIEW	124 WEST POINT RD		3
000974	150197	HUNTERS VIEW	243 WEST POINT RD		2
000974	150198	HUNTERS VIEW	245 WEST POINT RD		3
000974	150105	HUNTERS VIEW	180 WEST POINT RD		3
000974	150089	HUNTERS VIEW	148 WEST POINT RD		4
000974	150074	HUNTERS VIEW	116 WEST POINT RD		3
151	000974				
000988	510324	ROBERT B PITTS	1668 TURK STREET	324	2
000988	510216	ROBERT B PITTS	1155 PIERCE STREET	216	3
000988	510217	ROBERT B PITTS	1159 PIERCE STREET	217	3
000988	510218	ROBERT B PITTS	1111 PIERCE STREET	218	2
000988	510219	ROBERT B PITTS	1113 PIERCE STREET	219	2
000988	510220	ROBERT B PITTS	1115 PIERCE STREET	220	2
000988	510221	ROBERT B PITTS	1119 PIERCE STREET	221	2
000988	510222	ROBERT B PITTS	1121 PIERCE STREET	222	2
000988	510223	ROBERT B PITTS	1117 PIERCE STREET	223	2
000988	510300	ROBERT B PITTS	1620 TURK STREET	300	3
000988	510301	ROBERT B PITTS	1622 TURK STREET	301	3
000988	510302	ROBERT B PITTS	1624 TURK STREET	302	3
000988	510303	ROBERT B PITTS	1628 TURK STREET	303	3
000988	510304	ROBERT B PITTS	1630 TURK STREET	304	3
000988	510305	ROBERT B PITTS	1626 TURK STREET	305	3
000988	510306	ROBERT B PITTS	1632 TURK STREET	306	2
000988	510307	ROBERT B PITTS	1634 TURK STREET	307	2
000988	510308	ROBERT B PITTS	1636 TURK STREET	308	2
000988	510309	ROBERT B PITTS	1640 TURK STREET	309	2
000988	510310	ROBERT B PITTS	1642 TURK STREET	310	2
000988	510312	ROBERT B PITTS	1644 TURK STREET	312	3
000988	510313	ROBERT B PITTS	1646 TURK STREET	313	3
000988	510314	ROBERT B PITTS	1654 TURK STREET	314	3
000988	510315	ROBERT B PITTS	1650 TURK STREET	315	3
000988	510316	ROBERT B PITTS	1648 TURK STREET	316	3
000988	510317	ROBERT B PITTS	1652 TURK STREET	317	3
000988	510318	ROBERT B PITTS	1656 TURK STREET	318	3
000988	510319	ROBERT B PITTS	1658 TURK STREET	319	3
000988	510320	ROBERT B PITTS	1664 TURK STREET	320	3
000988	510321	ROBERT B PITTS	1660 TURK STREET	321	3
000988	510322	ROBERT B PITTS	1662 TURK STREET	322	3
000988	510323	ROBERT B PITTS	1666 TURK STREET	323	3
000988	510441	ROBERT B PITTS	1869 EDDY STREET	441	3
000988	510442	ROBERT B PITTS	1855 EDDY STREET	442	3
000988	510443	ROBERT B PITTS	1853 EDDY STREET	443	3
000988	510444	ROBERT B PITTS	1863 EDDY STREET	444	3
000988	510445	ROBERT B PITTS	1859 EDDY STREET	445	3
000988	510446	ROBERT B PITTS	1857 EDDY STREET	446	3
000988	510447	ROBERT B PITTS	1861 EDDY STREET	447	3
000988	510448	ROBERT B PITTS	1841 EDDY STREET	448	3
000988	510449	ROBERT B PITTS	1843 EDDY STREET	449	3
000988	510450	ROBERT B PITTS	1849 EDDY STREET	450	3

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000988	510451	ROBERT B PITTS	1845 EDDY STREET	451	3
000988	510452	ROBERT B PITTS	1847 EDDY STREET	452	3
000988	510454	ROBERT B PITTS	1831 EDDY STREET	454	2
000988	510455	ROBERT B PITTS	1829 EDDY STREET	455	2
000988	510456	ROBERT B PITTS	1835 EDDY STREET	456	2
000988	510458	ROBERT B PITTS	1837 EDDY STREET	458	2
000988	510459	ROBERT B PITTS	1833 EDDY STREET	459	2
000988	510460	ROBERT B PITTS	1819 EDDY STREET	460	2
000988	510461	ROBERT B PITTS	1817 EDDY STREET	461	2
000988	510462	ROBERT B PITTS	1823 EDDY STREET	462	2
000988	510463	ROBERT B PITTS	1827 EDDY STREET	463	2
000988	510464	ROBERT B PITTS	1825 EDDY STREET	464	2
000988	510465	ROBERT B PITTS	1821 EDDY STREET	465	2
000988	510466	ROBERT B PITTS	1839 EDDY STREET	466	2
000988	510325	ROBERT B PITTS	1670 TURK STREET	325	2
000988	510326	ROBERT B PITTS	1672 TURK STREET	326	2
000988	510327	ROBERT B PITTS	1676 TURK STREET	327	2
000988	510328	ROBERT B PITTS	1678 TURK STREET	328	2
000988	510329	ROBERT B PITTS	1674 TURK STREET	329	2
000988	510330	ROBERT B PITTS	1680 TURK STREET	330	2
000988	510331	ROBERT B PITTS	1682 TURK STREET	331	2
000988	510332	ROBERT B PITTS	1684 TURK STREET	332	2
000988	510333	ROBERT B PITTS	1688 TURK STREET	333	2
000988	510334	ROBERT B PITTS	1690 TURK STREET	334	2
000988	510335	ROBERT B PITTS	1686 TURK STREET	335	2
000988	510336	ROBERT B PITTS	1722 TURK STREET	336	2
000988	510337	ROBERT B PITTS	1724 TURK STREET	337	2
000988	510338	ROBERT B PITTS	1728 TURK STREET	338	2
000988	510339	ROBERT B PITTS	1732 TURK STREET	339	2
000988	510340	ROBERT B PITTS	1730 TURK STREET	340	2
000988	510341	ROBERT B PITTS	1726 TURK STREET	341	2
000988	510342	ROBERT B PITTS	1736 TURK STREET	342	2
000988	510343	ROBERT B PITTS	1734 TURK STREET	343	2
000988	510344	ROBERT B PITTS	1740 TURK STREET	344	2
000988	510345	ROBERT B PITTS	1744 TURK STREET	345	2
000988	510346	ROBERT B PITTS	1742 TURK STREET	346	2
000988	510347	ROBERT B PITTS	1738 TURK STREET	347	2
000988	510348	ROBERT B PITTS	1748 TURK STREET	348	3
000988	510349	ROBERT B PITTS	1746 TURK STREET	349	3
000988	510350	ROBERT B PITTS	1754 TURK STREET	350	3
000988	510351	ROBERT B PITTS	1750 TURK STREET	351	3
000988	510352	ROBERT B PITTS	1752 TURK STREET	352	3
000988	510353	ROBERT B PITTS	1756 TURK STREET	353	3
000988	510354	ROBERT B PITTS	1758 TURK STREET	354	3
000988	510355	ROBERT B PITTS	1760 TURK STREET	355	3
000988	510356	ROBERT B PITTS	1768 TURK STREET	356	3
000988	510357	ROBERT B PITTS	1764 TURK STREET	357	3
000988	510358	ROBERT B PITTS	1762 TURK STREET	358	3
000988	510359	ROBERT B PITTS	1766 TURK STREET	359	3
000988	510360	ROBERT B PITTS	1770 TURK STREET	360	2
000988	510361	ROBERT B PITTS	1772 TURK STREET	361	2
000988	510362	ROBERT B PITTS	1776 TURK STREET	362	2
000988	510363	ROBERT B PITTS	1780 TURK STREET	363	2
000988	510364	ROBERT B PITTS	1778 TURK STREET	364	2
000988	510365	ROBERT B PITTS	1774 TURK STREET	365	2
000988	510400	ROBERT B PITTS	1791 EDDY STREET	400	2
000988	510401	ROBERT B PITTS	1795 EDDY STREET	401	2
000988	510402	ROBERT B PITTS	1799 EDDY STREET	402	2

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000988	510403	ROBERT B PITTS	1789 EDDY STREET	403	2
000988	510404	ROBERT B PITTS	1793 EDDY STREET	404	2
000988	510405	ROBERT B PITTS	1797 EDDY STREET	405	2
000988	510406	ROBERT B PITTS	1779 EDDY STREET	406	2
000988	510407	ROBERT B PITTS	1783 EDDY STREET	407	2
000988	510408	ROBERT B PITTS	1787 EDDY STREET	408	2
000988	510409	ROBERT B PITTS	1777 EDDY STREET	409	2
000988	510410	ROBERT B PITTS	1781 EDDY STREET	410	2
000988	510411	ROBERT B PITTS	1785 EDDY STREET	411	2
000988	510412	ROBERT B PITTS	1763 EDDY STREET	412	3
000988	510413	ROBERT B PITTS	1765 EDDY STREET	413	3
000988	510414	ROBERT B PITTS	1767 EDDY STREET	414	3
000988	510415	ROBERT B PITTS	1769 EDDY STREET	415	3
000988	510416	ROBERT B PITTS	1771 EDDY STREET	416	3
000988	510417	ROBERT B PITTS	1773 EDDY STREET	417	3
000988	510418	ROBERT B PITTS	1751 EDDY STREET	418	3
000988	510419	ROBERT B PITTS	1753 EDDY STREET	419	3
000988	510420	ROBERT B PITTS	1755 EDDY STREET	420	3
000988	510421	ROBERT B PITTS	1757 EDDY STREET	421	3
000988	510422	ROBERT B PITTS	1759 EDDY STREET	422	3
000988	510423	ROBERT B PITTS	1761 EDDY STREET	423	3
000988	510424	ROBERT B PITTS	1729 EDDY STREET	424	2
000988	510425	ROBERT B PITTS	1731 EDDY STREET	425	2
000988	510426	ROBERT B PITTS	1733 EDDY STREET	426	2
000988	510427	ROBERT B PITTS	1737 EDDY STREET	427	2
000988	510428	ROBERT B PITTS	1739 EDDY STREET	428	2
000988	510429	ROBERT B PITTS	1735 EDDY STREET	429	2
000988	510430	ROBERT B PITTS	1717 EDDY STREET	430	3
000988	510431	ROBERT B PITTS	1719 EDDY STREET	431	3
000988	510432	ROBERT B PITTS	1721 EDDY STREET	432	3
000988	510433	ROBERT B PITTS	1725 EDDY STREET	433	3
000988	510434	ROBERT B PITTS	1727 EDDY STREET	434	3
000988	510435	ROBERT B PITTS	1723 EDDY STREET	435	3
000988	510436	ROBERT B PITTS	1865 EDDY STREET	436	3
000988	510437	ROBERT B PITTS	1867 EDDY STREET	437	3
000988	510438	ROBERT B PITTS	1871 EDDY STREET	438	3
000988	510439	ROBERT B PITTS	1875 EDDY STREET	439	3
000988	510133	ROBERT B PITTS	1153 SCOTT STREET	133	4
000988	510134	ROBERT B PITTS	1151 SCOTT STREET	134	4
000988	510135	ROBERT B PITTS	1125 SCOTT STREET	135	3
000988	510136	ROBERT B PITTS	1123 SCOTT STREET	136	3
000988	510137	ROBERT B PITTS	1129 SCOTT STREET	137	3
000988	510138	ROBERT B PITTS	1133 SCOTT STREET	138	3
000988	510139	ROBERT B PITTS	1131 SCOTT STREET	139	3
000988	510140	ROBERT B PITTS	1127 SCOTT STREET	140	3
000988	510141	ROBERT B PITTS	1113 SCOTT STREET	141	3
000988	510142	ROBERT B PITTS	1111 SCOTT STREET	142	3
000988	510143	ROBERT B PITTS	1117 SCOTT STREET	143	3
000988	510144	ROBERT B PITTS	1121 SCOTT STREET	144	3
000988	510145	ROBERT B PITTS	1119 SCOTT STREET	145	3
000988	510146	ROBERT B PITTS	1115 SCOTT STREET	146	3
000988	510200	ROBERT B PITTS	1177 PIERCE STREET	200	2
000988	510201	ROBERT B PITTS	1175 PIERCE STREET	201	2
000988	510202	ROBERT B PITTS	1181 PIERCE STREET	202	2
000988	510203	ROBERT B PITTS	1185 PIERCE STREET	203	2
000988	510204	ROBERT B PITTS	1183 PIERCE STREET	204	2
000988	510205	ROBERT B PITTS	1179 PIERCE STREET	205	2
000988	510206	ROBERT B PITTS	1163 PIERCE STREET	206	3

Potential MOD Units AMPs 966-967-971-974-988

AMP	UnitNum	Development	Address	AptNum	Bedrooms
000988	510207	ROBERT B PITTS	1165 PIERCE STREET	207	3
000988	510208	ROBERT B PITTS	1171 PIERCE STREET	208	3
000988	510209	ROBERT B PITTS	1167 PIERCE STREET	209	3
000988	510210	ROBERT B PITTS	1169 PIERCE STREET	210	3
000988	510211	ROBERT B PITTS	1173 PIERCE STREET	211	3
000988	510212	ROBERT B PITTS	1153 PIERCE STREET	212	3
000988	510213	ROBERT B PITTS	1151 PIERCE STREET	213	3
000988	510214	ROBERT B PITTS	1161 PIERCE STREET	214	3
000988	510215	ROBERT B PITTS	1157 PIERCE STREET	215	3
000988	510100	ROBERT B PITTS	1188 SCOTT STREET	100	3
000988	510101	ROBERT B PITTS	1190 SCOTT STREET	101	3
000988	510102	ROBERT B PITTS	1194 SCOTT STREET	102	3
000988	510103	ROBERT B PITTS	1198 SCOTT STREET	103	3
000988	510104	ROBERT B PITTS	1196 SCOTT STREET	104	3
000988	510105	ROBERT B PITTS	1192 SCOTT STREET	105	3
000988	510106	ROBERT B PITTS	1102 SCOTT STREET	106	3
000988	510107	ROBERT B PITTS	1100 SCOTT STREET	107	3
000988	510109	ROBERT B PITTS	1110 SCOTT STREET	109	3
000988	510110	ROBERT B PITTS	1108 SCOTT STREET	110	3
000988	510111	ROBERT B PITTS	1104 SCOTT STREET	111	3
000988	510112	ROBERT B PITTS	1140 SCOTT STREET	112	4
000988	510113	ROBERT B PITTS	1142 SCOTT STREET	113	4
000988	510114	ROBERT B PITTS	1144 SCOTT STREET	114	4
000988	510115	ROBERT B PITTS	1146 SCOTT STREET	115	4
000988	510116	ROBERT B PITTS	1164 SCOTT STREET	116	4
000988	510117	ROBERT B PITTS	1166 SCOTT STREET	117	4
000988	510118	ROBERT B PITTS	1160 SCOTT STREET	118	4
000988	510119	ROBERT B PITTS	1162 SCOTT STREET	119	4
000988	510120	ROBERT B PITTS	1171 SCOTT STREET	120	3
000988	510121	ROBERT B PITTS	1169 SCOTT STREET	121	3
000988	510122	ROBERT B PITTS	1175 SCOTT STREET	122	3
000988	510123	ROBERT B PITTS	1179 SCOTT STREET	123	3
000988	510124	ROBERT B PITTS	1177 SCOTT STREET	124	3
000988	510125	ROBERT B PITTS	1173 SCOTT STREET	125	3
000988	510126	ROBERT B PITTS	1157 SCOTT STREET	126	3
000988	510127	ROBERT B PITTS	1159 SCOTT STREET	127	3
000988	510128	ROBERT B PITTS	1163 SCOTT STREET	128	3
000988	510129	ROBERT B PITTS	1167 SCOTT STREET	129	3
000988	510130	ROBERT B PITTS	1165 SCOTT STREET	130	3
000988	510131	ROBERT B PITTS	1161 SCOTT STREET	131	3
000988	216	ROBERT B PITTS	1155 PIERCE STREET	216	3
000988	510132	ROBERT B PITTS	1155 SCOTT STREET	132	4
000988	510453	ROBERT B PITTS	1851 EDDY STREET	453	3
000988	510311	ROBERT B PITTS	1638 TURK STREET	311	2
000988	510440	ROBERT B PITTS	1873 EDDY STREET	440	3
203	000988				

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address	Bdrm Size	Apt No.	Bldg No.	Zip Code	Count
CA001000968	003	SUNNYDALE	030001	1950 SUNNYDALE AVE	2		0301	94134	1
CA001000968	003	SUNNYDALE	030002	1952 SUNNYDALE AVE	2		0301	94134	1
CA001000968	003	SUNNYDALE	030003	1954 SUNNYDALE AVE	3		0301	94134	1
CA001000968	003	SUNNYDALE	030004	1956 SUNNYDALE AVE	2		0301	94134	1
CA001000968	003	SUNNYDALE	030005	1958 SUNNYDALE AVE	2		0301	94134	1
CA001000968	003	SUNNYDALE	030006	1960 SUNNYDALE AVE	2		0301	94134	1
CA001000968	003	SUNNYDALE	030007	1962 SUNNYDALE AVE	3		0301	94134	1
CA001000968	003	SUNNYDALE	030008	1964 SUNNYDALE AVE	2		0301	94134	1
CA001000968	003	SUNNYDALE	030009	1924 SUNNYDALE AVE	2		0302	94134	1
CA001000968	003	SUNNYDALE	030010	1926 SUNNYDALE AVE	3		0302	94134	1
CA001000968	003	SUNNYDALE	030011	1928 SUNNYDALE AVE	2		0302	94134	1
CA001000968	003	SUNNYDALE	030012	1930 SUNNYDALE AVE	2		0302	94134	1
CA001000968	003	SUNNYDALE	030013	1932 SUNNYDALE AVE	2		0302	94134	1
CA001000968	003	SUNNYDALE	030014	1934 SUNNYDALE AVE	3		0302	94134	1
CA001000968	003	SUNNYDALE	030015	1936 SUNNYDALE AVE	2		0302	94134	1
CA001000968	003	SUNNYDALE	030016	1938 SUNNYDALE AVE	2		0302	94134	1
CA001000968	003	SUNNYDALE	030017	1900 SUNNYDALE AVE	2		0303	94134	1
CA001000968	003	SUNNYDALE	030018	1902 SUNNYDALE AVE	2		0303	94134	1
CA001000968	003	SUNNYDALE	030019	1904 SUNNYDALE AVE	3		0303	94134	1
CA001000968	003	SUNNYDALE	030020	1906 SUNNYDALE AVE	2		0303	94134	1
CA001000968	003	SUNNYDALE	030021	1908 SUNNYDALE AVE	2		0303	94134	1
CA001000968	003	SUNNYDALE	030022	1910 SUNNYDALE AVE	2		0303	94134	1
CA001000968	003	SUNNYDALE	030023	1912 SUNNYDALE AVE	2		0303	94134	1
CA001000968	003	SUNNYDALE	030024	1914 SUNNYDALE AVE	2		0303	94134	1
CA001000968	003	SUNNYDALE	030025	1916 SUNNYDALE AVE	2		0303	94134	1
CA001000968	003	SUNNYDALE	030026	1918 SUNNYDALE AVE	2		0303	94134	1
CA001000968	003	SUNNYDALE	030027	1920 SUNNYDALE AVE	3		0303	94134	1
CA001000968	003	SUNNYDALE	030028	1922 SUNNYDALE AVE	2		0303	94134	1
CA001000968	003	SUNNYDALE	030029	1872 SUNNYDALE AVE	2		0304	94134	1
CA001000968	003	SUNNYDALE	030030	1874 SUNNYDALE AVE	3		0304	94134	1
CA001000968	003	SUNNYDALE	030031	1876 SUNNYDALE AVE	2		0304	94134	1
CA001000968	003	SUNNYDALE	030032	1878 SUNNYDALE AVE	2		0304	94134	1
CA001000968	003	SUNNYDALE	030033	1880 SUNNYDALE AVE	2		0304	94134	1
CA001000968	003	SUNNYDALE	030034	1882 SUNNYDALE AVE	2		0304	94134	1
CA001000968	003	SUNNYDALE	030035	1884 SUNNYDALE AVE	2		0304	94134	1
CA001000968	003	SUNNYDALE	030036	1886 SUNNYDALE AVE	2		0304	94134	1
CA001000968	003	SUNNYDALE	030037	1888 SUNNYDALE AVE	2		0304	94134	1
CA001000968	003	SUNNYDALE	030038	1890 SUNNYDALE AVE	3		0304	94134	1
CA001000968	003	SUNNYDALE	030039	1892 SUNNYDALE AVE	2		0304	94134	1
CA001000968	003	SUNNYDALE	030040	1894 SUNNYDALE AVE	2		0304	94134	1
CA001000968	003	SUNNYDALE	030041	1848 SUNNYDALE AVE	2		0305	94134	1
CA001000968	003	SUNNYDALE	030042	1850 SUNNYDALE AVE	2		0305	94134	1
CA001000968	003	SUNNYDALE	030043	1852 SUNNYDALE AVE	3		0305	94134	1
CA001000968	003	SUNNYDALE	030044	1854 SUNNYDALE AVE	2		0305	94134	1
CA001000968	003	SUNNYDALE	030045	1856 SUNNYDALE AVE	2		0305	94134	1

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address		Bdrm Size	Apt No.	Bldg No.	Zip Code	Count
CA001000968	003	SUNNYDALE	030046	1858	SUNNYDALE AVE	2		0305	94134	1
CA001000968	003	SUNNYDALE	030047	1860	SUNNYDALE AVE	2		0305	94134	1
CA001000968	003	SUNNYDALE	030048	1862	SUNNYDALE AVE	2		0305	94134	1
CA001000968	003	SUNNYDALE	030049	1864	SUNNYDALE AVE	2		0305	94134	1
CA001000968	003	SUNNYDALE	030050	1866	SUNNYDALE AVE	2		0305	94134	1
CA001000968	003	SUNNYDALE	030051	1868	SUNNYDALE AVE	3		0305	94134	1
CA001000968	003	SUNNYDALE	030052	1870	SUNNYDALE AVE	2		0305	94134	1
CA001000968	003	SUNNYDALE	030053	1824	SUNNYDALE AVE	2		0306	94134	1
CA001000968	003	SUNNYDALE	030054	1826	SUNNYDALE AVE	3		0306	94134	1
CA001000968	003	SUNNYDALE	030055	1828	SUNNYDALE AVE	2		0306	94134	1
CA001000968	003	SUNNYDALE	030056	1830	SUNNYDALE AVE	2		0306	94134	1
CA001000968	003	SUNNYDALE	030057	1832	SUNNYDALE AVE	2		0306	94134	1
CA001000968	003	SUNNYDALE	030058	1834	SUNNYDALE AVE	2		0306	94134	1
CA001000968	003	SUNNYDALE	030059	1836	SUNNYDALE AVE	2		0306	94134	1
CA001000968	003	SUNNYDALE	030060	1838	SUNNYDALE AVE	2		0306	94134	1
CA001000968	003	SUNNYDALE	030061	1840	SUNNYDALE AVE	2		0306	94134	1
CA001000968	003	SUNNYDALE	030062	1842	SUNNYDALE AVE	3		0306	94134	1
CA001000968	003	SUNNYDALE	030063	1844	SUNNYDALE AVE	2		0306	94134	1
CA001000968	003	SUNNYDALE	030064	1846	SUNNYDALE AVE	2		0306	94134	1
CA001000968	003	SUNNYDALE	030065	1800	SUNNYDALE AVE	2		0307	94134	1
CA001000968	003	SUNNYDALE	030066	1802	SUNNYDALE AVE	2		0307	94134	1
CA001000968	003	SUNNYDALE	030067	1804	SUNNYDALE AVE	3		0307	94134	1
CA001000968	003	SUNNYDALE	030068	1806	SUNNYDALE AVE	2		0307	94134	1
CA001000968	003	SUNNYDALE	030069	1808	SUNNYDALE AVE	2		0307	94134	1
CA001000968	003	SUNNYDALE	030070	1810	SUNNYDALE AVE	2		0307	94134	1
CA001000968	003	SUNNYDALE	030071	1812	SUNNYDALE AVE	2		0307	94134	1
CA001000968	003	SUNNYDALE	030072	1814	SUNNYDALE AVE	2		0307	94134	1
CA001000968	003	SUNNYDALE	030073	1816	SUNNYDALE AVE	2		0307	94134	1
CA001000968	003	SUNNYDALE	030074	1818	SUNNYDALE AVE	2		0307	94134	1
CA001000968	003	SUNNYDALE	030075	1820	SUNNYDALE AVE	3		0307	94134	1
CA001000968	003	SUNNYDALE	030076	1822	SUNNYDALE AVE	2		0307	94134	1
CA001000968	003	SUNNYDALE	030077	1772	SUNNYDALE AVE	2		0308	94134	1
CA001000968	003	SUNNYDALE	030078	1774	SUNNYDALE AVE	3		0308	94134	1
CA001000968	003	SUNNYDALE	030079	1776	SUNNYDALE AVE	2		0308	94134	1
CA001000968	003	SUNNYDALE	030080	1778	SUNNYDALE AVE	2		0308	94134	1
CA001000968	003	SUNNYDALE	030081	1780	SUNNYDALE AVE	2		0308	94134	1
CA001000968	003	SUNNYDALE	030082	1782	SUNNYDALE AVE	2		0308	94134	1
CA001000968	003	SUNNYDALE	030083	1784	SUNNYDALE AVE	2		0308	94134	1
CA001000968	003	SUNNYDALE	030084	1786	SUNNYDALE AVE	2		0308	94134	1
CA001000968	003	SUNNYDALE	030085	1788	SUNNYDALE AVE	2		0308	94134	1
CA001000968	003	SUNNYDALE	030086	1790	SUNNYDALE AVE	3		0308	94134	1
CA001000968	003	SUNNYDALE	030087	1792	SUNNYDALE AVE	2		0308	94134	1
CA001000968	003	SUNNYDALE	030088	1794	SUNNYDALE AVE	2		0308	94134	1
CA001000968	003	SUNNYDALE	030089	1748	SUNNYDALE AVE	2		0309	94134	1
CA001000968	003	SUNNYDALE	030090	1750	SUNNYDALE AVE	2		0309	94134	1

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address		Bdrm Size	Apt No.	Bldg No.	Zip Code	Count
CA001000968	003	SUNNYDALE	030091	1752	SUNNYDALE AVE	3		0309	94134	1
CA001000968	003	SUNNYDALE	030092	1754	SUNNYDALE AVE	2		0309	94134	1
CA001000968	003	SUNNYDALE	030093	1756	SUNNYDALE AVE	2		0309	94134	1
CA001000968	003	SUNNYDALE	030094	1758	SUNNYDALE AVE	2		0309	94134	1
CA001000968	003	SUNNYDALE	030095	1760	SUNNYDALE AVE	2		0309	94134	1
CA001000968	003	SUNNYDALE	030096	1762	SUNNYDALE AVE	2		0309	94134	1
CA001000968	003	SUNNYDALE	030097	1764	SUNNYDALE AVE	2		0309	94134	1
CA001000968	003	SUNNYDALE	030098	1766	SUNNYDALE AVE	2		0309	94134	1
CA001000968	003	SUNNYDALE	030099	1768	SUNNYDALE AVE	3		0309	94134	1
CA001000968	003	SUNNYDALE	030100	1770	SUNNYDALE AVE	2		0309	94134	1
CA001000968	003	SUNNYDALE	030101	1724	SUNNYDALE AVE	2		0310	94134	1
CA001000968	003	SUNNYDALE	030102	1726	SUNNYDALE AVE	3		0310	94134	1
CA001000968	003	SUNNYDALE	030103	1728	SUNNYDALE AVE	2		0310	94134	1
CA001000968	003	SUNNYDALE	030104	1730	SUNNYDALE AVE	2		0310	94134	1
CA001000968	003	SUNNYDALE	030105	1732	SUNNYDALE AVE	2		0310	94134	1
CA001000968	003	SUNNYDALE	030106	1734	SUNNYDALE AVE	2		0310	94134	1
CA001000968	003	SUNNYDALE	030107	1736	SUNNYDALE AVE	2		0310	94134	1
CA001000968	003	SUNNYDALE	030108	1738	SUNNYDALE AVE	2		0310	94134	1
CA001000968	003	SUNNYDALE	030109	1740	SUNNYDALE AVE	2		0310	94134	1
CA001000968	003	SUNNYDALE	030110	1742	SUNNYDALE AVE	3		0310	94134	1
CA001000968	003	SUNNYDALE	030111	1744	SUNNYDALE AVE	2		0310	94134	1
CA001000968	003	SUNNYDALE	030112	1746	SUNNYDALE AVE	2		0310	94134	1
CA001000968	003	SUNNYDALE	030113	1700	SUNNYDALE AVE	2		0311	94134	1
CA001000968	003	SUNNYDALE	030114	1702	SUNNYDALE AVE	2		0311	94134	1
CA001000968	003	SUNNYDALE	030115	1704	SUNNYDALE AVE	3		0311	94134	1
CA001000968	003	SUNNYDALE	030116	1706	SUNNYDALE AVE	2		0311	94134	1
CA001000968	003	SUNNYDALE	030117	1708	SUNNYDALE AVE	2		0311	94134	1
CA001000968	003	SUNNYDALE	030118	1710	SUNNYDALE AVE	2		0311	94134	1
CA001000968	003	SUNNYDALE	030119	1712	SUNNYDALE AVE	2		0311	94134	1
CA001000968	003	SUNNYDALE	030120	1714	SUNNYDALE AVE	2		0311	94134	1
CA001000968	003	SUNNYDALE	030121	1716	SUNNYDALE AVE	2		0311	94134	1
CA001000968	003	SUNNYDALE	030122	1718	SUNNYDALE AVE	2		0311	94134	1
CA001000968	003	SUNNYDALE	030123	1720	SUNNYDALE AVE	3		0311	94134	1
CA001000968	003	SUNNYDALE	030124	1722	SUNNYDALE AVE	2		0311	94134	1
CA001000968	003	SUNNYDALE	030125	1600	SUNNYDALE AVE	2		0312	94134	1
CA001000968	003	SUNNYDALE	030126	1602	SUNNYDALE AVE	2		0312	94134	1
CA001000968	003	SUNNYDALE	030127	1604	SUNNYDALE AVE	3		0312	94134	1
CA001000968	003	SUNNYDALE	030128	1606	SUNNYDALE AVE	2		0312	94134	1
CA001000968	003	SUNNYDALE	030129	1608	SUNNYDALE AVE	2		0312	94134	1
CA001000968	003	SUNNYDALE	030130	1610	SUNNYDALE AVE	2		0312	94134	1
CA001000968	003	SUNNYDALE	030131	1612	SUNNYDALE AVE	3		0312	94134	1
CA001000968	003	SUNNYDALE	030132	1614	SUNNYDALE AVE	2		0312	94134	1
CA001000968	003	SUNNYDALE	030133	1616	SUNNYDALE AVE	2		0313	94134	1
CA001000968	003	SUNNYDALE	030134	1618	SUNNYDALE AVE	2		0313	94134	1
CA001000968	003	SUNNYDALE	030135	1620	SUNNYDALE AVE	3		0313	94134	1

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.		Unit Address	Bdrm Size	Apt No.	Bldg No.	Zip Code	Count
CA001000968	003	SUNNYDALE	030136	1622	SUNNYDALE AVE	2		0313	94134	1
CA001000968	003	SUNNYDALE	030137	1624	SUNNYDALE AVE	2		0313	94134	1
CA001000968	003	SUNNYDALE	030138	1626	SUNNYDALE AVE	2		0313	94134	1
CA001000968	003	SUNNYDALE	030139	1628	SUNNYDALE AVE	3		0313	94134	1
CA001000968	003	SUNNYDALE	030140	1630	SUNNYDALE AVE	2		0313	94134	1
CA001000968	003	SUNNYDALE	030141	1554	SUNNYDALE AVE	2		0314	94134	1
CA001000968	003	SUNNYDALE	030142	1552	SUNNYDALE AVE	2		0314	94134	1
CA001000968	003	SUNNYDALE	030143	1550	SUNNYDALE AVE	3		0314	94134	1
CA001000968	003	SUNNYDALE	030144	1548	SUNNYDALE AVE	2		0314	94134	1
CA001000968	003	SUNNYDALE	030145	1546	SUNNYDALE AVE	2		0314	94134	1
CA001000968	003	SUNNYDALE	030146	1544	SUNNYDALE AVE	2		0314	94134	1
CA001000968	003	SUNNYDALE	030147	1542	SUNNYDALE AVE	3		0314	94134	1
CA001000968	003	SUNNYDALE	030148	1540	SUNNYDALE AVE	2		0314	94134	1
CA001000968	003	SUNNYDALE	030149	1530	SUNNYDALE AVE	2		015	94134	1
CA001000968	003	SUNNYDALE	030150	1532	SUNNYDALE AVE	2		015	94134	1
CA001000968	003	SUNNYDALE	030151	1534	SUNNYDALE AVE	3		015	94134	1
CA001000968	003	SUNNYDALE	030152	1536	SUNNYDALE AVE	2		015	94134	1
CA001000968	003	SUNNYDALE	030153	1520	SUNNYDALE AVE	2		0316	94134	1
CA001000968	003	SUNNYDALE	030154	1522	SUNNYDALE AVE	3		0316	94134	1
CA001000968	003	SUNNYDALE	030155	1524	SUNNYDALE AVE	2		0316	94134	1
CA001000968	003	SUNNYDALE	030156	1526	SUNNYDALE AVE	2		0316	94134	1
CA001000968	003	SUNNYDALE	030157	1514	SUNNYDALE AVE	2		0318	94134	1
CA001000968	003	SUNNYDALE	030158	1512	SUNNYDALE AVE	2		0318	94134	1
CA001000968	003	SUNNYDALE	030159	1510	SUNNYDALE AVE	3		0318	94134	1
CA001000968	003	SUNNYDALE	030160	1508	SUNNYDALE AVE	2		0318	94134	1
CA001000968	003	SUNNYDALE	030161	1506	SUNNYDALE AVE	2		0318	94134	1
CA001000968	003	SUNNYDALE	030162	1504	SUNNYDALE AVE	2		0318	94134	1
CA001000968	003	SUNNYDALE	030163	1502	SUNNYDALE AVE	3		0318	94134	1
CA001000968	003	SUNNYDALE	030164	1500	SUNNYDALE AVE	2		0318	94134	1
CA001000968	003	SUNNYDALE	030165	1501	SUNNYDALE AVE	2		0319	94134	1
CA001000968	003	SUNNYDALE	030166	1503	SUNNYDALE AVE	2		0319	94134	1
CA001000968	003	SUNNYDALE	030167	1505	SUNNYDALE AVE	3		0319	94134	1
CA001000968	003	SUNNYDALE	030168	1507	SUNNYDALE AVE	2		0319	94134	1
CA001000968	003	SUNNYDALE	030169	1509	SUNNYDALE AVE	2		0319	94134	1
CA001000968	003	SUNNYDALE	030170	1511	SUNNYDALE AVE	2		0319	94134	1
CA001000968	003	SUNNYDALE	030171	1513	SUNNYDALE AVE	3		0319	94134	1
CA001000968	003	SUNNYDALE	030172	1515	SUNNYDALE AVE	2		0319	94134	1
CA001000968	003	SUNNYDALE	030173	1519	SUNNYDALE AVE	4		0327	94134	1
CA001000968	003	SUNNYDALE	030174	1521	SUNNYDALE AVE	2		0327	94134	1
CA001000968	003	SUNNYDALE	030176	1525	SUNNYDALE AVE	4		0327	94134	1
CA001000968	003	SUNNYDALE	030177	1527	SUNNYDALE AVE	4		0327	94134	1
CA001000968	003	SUNNYDALE	030178	1529	SUNNYDALE AVE	2		0327	94134	1
CA001000968	003	SUNNYDALE	030180	1533	SUNNYDALE AVE	4		0327	94134	1
CA001000968	003	SUNNYDALE	030181	1535	SUNNYDALE AVE	4		0326	94134	1
CA001000968	003	SUNNYDALE	030182	1537	SUNNYDALE AVE	2		0326	94134	1

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CA No.	Dev. No.	Development Name	Unit No.		Unit Address	Bdrm Size	Apt No.	Bldg No.	Zip Code	Count
CA001000968	003	SUNNYDALE	030184	1541	SUNNYDALE AVE	4		0326	94134	1
CA001000968	003	SUNNYDALE	030185	1543	SUNNYDALE AVE	4		0326	94134	1
CA001000968	003	SUNNYDALE	030186	1545	SUNNYDALE AVE	2		0326	94134	1
CA001000968	003	SUNNYDALE	030188	1549	SUNNYDALE AVE	4		0326	94134	1
CA001000968	003	SUNNYDALE	030189	1551	SUNNYDALE AVE	4		0325	94134	1
CA001000968	003	SUNNYDALE	030191	1555	SUNNYDALE AVE	2		0325	94134	1
CA001000968	003	SUNNYDALE	030192	1557	SUNNYDALE AVE	4		0325	94134	1
CA001000968	003	SUNNYDALE	030193	1559	SUNNYDALE AVE	4		0325	94134	1
CA001000968	003	SUNNYDALE	030195	1563	SUNNYDALE AVE	2		0325	94134	1
CA001000968	003	SUNNYDALE	030196	1565	SUNNYDALE AVE	4		0325	94134	1
CA001000968	003	SUNNYDALE	030197	1569	SUNNYDALE AVE	2		0320	94134	1
CA001000968	003	SUNNYDALE	030198	1571	SUNNYDALE AVE	2		0320	94134	1
CA001000968	003	SUNNYDALE	030199	1573	SUNNYDALE AVE	3		0320	94134	1
CA001000968	003	SUNNYDALE	030200	1575	SUNNYDALE AVE	2		0320	94134	1
CA001000968	003	SUNNYDALE	030201	1577	SUNNYDALE AVE	2		0320	94134	1
CA001000968	003	SUNNYDALE	030202	1579	SUNNYDALE AVE	2		0320	94134	1
CA001000968	003	SUNNYDALE	030203	1581	SUNNYDALE AVE	3		0320	94134	1
CA001000968	003	SUNNYDALE	030204	1583	SUNNYDALE AVE	2		0320	94134	1
CA001000968	003	SUNNYDALE	030205	1601	SUNNYDALE AVE	2		0324	94134	1
CA001000968	003	SUNNYDALE	030206	1603	SUNNYDALE AVE	2		0324	94134	1
CA001000968	003	SUNNYDALE	030207	1605	SUNNYDALE AVE	3		0324	94134	1
CA001000968	003	SUNNYDALE	030208	1607	SUNNYDALE AVE	2		0324	94134	1
CA001000968	003	SUNNYDALE	030209	1609	SUNNYDALE AVE	2		0324	94134	1
CA001000968	003	SUNNYDALE	030210	1611	SUNNYDALE AVE	2		0324	94134	1
CA001000968	003	SUNNYDALE	030211	1613	SUNNYDALE AVE	3		0324	94134	1
CA001000968	003	SUNNYDALE	030212	1615	SUNNYDALE AVE	2		0324	94134	1
CA001000968	003	SUNNYDALE	030213	1617	SUNNYDALE AVE	2		0323	94134	1
CA001000968	003	SUNNYDALE	030214	1619	SUNNYDALE AVE	2		0323	94134	1
CA001000968	003	SUNNYDALE	030215	1621	SUNNYDALE AVE	3		0323	94134	1
CA001000968	003	SUNNYDALE	030216	1623	SUNNYDALE AVE	2		0323	94134	1
CA001000968	003	SUNNYDALE	030217	1625	SUNNYDALE AVE	2		0323	94134	1
CA001000968	003	SUNNYDALE	030218	1627	SUNNYDALE AVE	2		0323	94134	1
CA001000968	003	SUNNYDALE	030219	1629	SUNNYDALE AVE	3		0323	94134	1
CA001000968	003	SUNNYDALE	030220	1631	SUNNYDALE AVE	2		0323	94134	1
CA001000968	003	SUNNYDALE	030221	1633	SUNNYDALE AVE	4		0322	94134	1
CA001000968	003	SUNNYDALE	030222	1635	SUNNYDALE AVE	2		0322	94134	1
CA001000968	003	SUNNYDALE	030224	1639	SUNNYDALE AVE	4		0322	94134	1
CA001000968	003	SUNNYDALE	030225	1641	SUNNYDALE AVE	4		0322	94134	1
CA001000968	003	SUNNYDALE	030226	1643	SUNNYDALE AVE	2		0322	94134	1
CA001000968	003	SUNNYDALE	030228	1647	SUNNYDALE AVE	4		0322	94134	1
CA001000968	003	SUNNYDALE	030229	1651	SUNNYDALE AVE	2		0321	94134	1
CA001000968	003	SUNNYDALE	030230	1653	SUNNYDALE AVE	2		0321	94134	1
CA001000968	003	SUNNYDALE	030231	1655	SUNNYDALE AVE	3		0321	94134	1
CA001000968	003	SUNNYDALE	030232	1657	SUNNYDALE AVE	2		0321	94134	1
CA001000968	003	SUNNYDALE	030233	1701	SUNNYDALE AVE	2		0340	94134	1

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CA No.	Dev. No.	Development Name	Unit No.	Unit Address		Bdrm Size	Apt No.	Bldg No.	Zip Code	Count
CA001000968	003	SUNNYDALE	030234	1703	SUNNYDALE AVE	2		0340	94134	1
CA001000968	003	SUNNYDALE	030235	1705	SUNNYDALE AVE	3		0340	94134	1
CA001000968	003	SUNNYDALE	030236	1707	SUNNYDALE AVE	2		0340	94134	1
CA001000968	003	SUNNYDALE	030237	1709	SUNNYDALE AVE	2		0340	94134	1
CA001000968	003	SUNNYDALE	030238	1711	SUNNYDALE AVE	2		0340	94134	1
CA001000968	003	SUNNYDALE	030239	1713	SUNNYDALE AVE	3		0340	94134	1
CA001000968	003	SUNNYDALE	030240	1715	SUNNYDALE AVE	2		0340	94134	1
CA001000968	003	SUNNYDALE	030241	1725	SUNNYDALE AVE	2		0341	94134	1
CA001000968	003	SUNNYDALE	030242	1727	SUNNYDALE AVE	2		0341	94134	1
CA001000968	003	SUNNYDALE	030243	1729	SUNNYDALE AVE	3		0341	94134	1
CA001000968	003	SUNNYDALE	030244	1731	SUNNYDALE AVE	2		0341	94134	1
CA001000968	003	SUNNYDALE	030245	1733	SUNNYDALE AVE	2		0341	94134	1
CA001000968	003	SUNNYDALE	030246	1735	SUNNYDALE AVE	2		0341	94134	1
CA001000968	003	SUNNYDALE	030247	1737	SUNNYDALE AVE	3		0341	94134	1
CA001000968	003	SUNNYDALE	030248	1739	SUNNYDALE AVE	2		0341	94134	1
CA001000968	003	SUNNYDALE	030249	1751	SUNNYDALE AVE	2		0342	94134	1
CA001000968	003	SUNNYDALE	030250	1753	SUNNYDALE AVE	3		0342	94134	1
CA001000968	003	SUNNYDALE	030251	1755	SUNNYDALE AVE	2		0342	94134	1
CA001000968	003	SUNNYDALE	030252	1757	SUNNYDALE AVE	2		0342	94134	1
CA001000968	003	SUNNYDALE	030253	1759	SUNNYDALE AVE	2		0342	94134	1
CA001000968	003	SUNNYDALE	030254	1761	SUNNYDALE AVE	3		0342	94134	1
CA001000968	003	SUNNYDALE	030255	1763	SUNNYDALE AVE	2		0342	94134	1
CA001000968	003	SUNNYDALE	030256	1765	SUNNYDALE AVE	2		0342	94134	1
CA001000968	003	SUNNYDALE	030257	1801	SUNNYDALE AVE	2		0343	94134	1
CA001000968	003	SUNNYDALE	030258	1803	SUNNYDALE AVE	2		0343	94134	1
CA001000968	003	SUNNYDALE	030259	1805	SUNNYDALE AVE	3		0343	94134	1
CA001000968	003	SUNNYDALE	030260	1807	SUNNYDALE AVE	2		0343	94134	1
CA001000968	003	SUNNYDALE	030261	1809	SUNNYDALE AVE	2		0343	94134	1
CA001000968	003	SUNNYDALE	030262	1811	SUNNYDALE AVE	2		0343	94134	1
CA001000968	003	SUNNYDALE	030263	1813	SUNNYDALE AVE	3		0343	94134	1
CA001000968	003	SUNNYDALE	030264	1815	SUNNYDALE AVE	2		0343	94134	1
CA001000968	003	SUNNYDALE	030265	1825	SUNNYDALE AVE	2		0344	94134	1
CA001000968	003	SUNNYDALE	030266	1827	SUNNYDALE AVE	3		0344	94134	1
CA001000968	003	SUNNYDALE	030267	1829	SUNNYDALE AVE	2		0344	94134	1
CA001000968	003	SUNNYDALE	030268	1831	SUNNYDALE AVE	2		0344	94134	1
CA001000968	003	SUNNYDALE	030269	1833	SUNNYDALE AVE	2		0344	94134	1
CA001000968	003	SUNNYDALE	030270	1835	SUNNYDALE AVE	3		0344	94134	1
CA001000968	003	SUNNYDALE	030271	1837	SUNNYDALE AVE	2		0344	94134	1
CA001000968	003	SUNNYDALE	030272	1839	SUNNYDALE AVE	2		0344	94134	1
CA001000968	003	SUNNYDALE	030273	1851	SUNNYDALE AVE	2		0345	94134	1
CA001000968	003	SUNNYDALE	030274	1853	SUNNYDALE AVE	2		0345	94134	1
CA001000968	003	SUNNYDALE	030275	1855	SUNNYDALE AVE	3		0345	94134	1
CA001000968	003	SUNNYDALE	030276	1857	SUNNYDALE AVE	2		0345	94134	1
CA001000968	003	SUNNYDALE	030277	1859	SUNNYDALE AVE	2		0345	94134	1
CA001000968	003	SUNNYDALE	030278	1861	SUNNYDALE AVE	2		0345	94134	1

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CA No.	Dev. No.	Development Name	Unit No.		Unit Address	Bdrm Size	Apt No.	Bldg No.	Zip Code	Count
CA001000968	003	SUNNYDALE	030279	1863	SUNNYDALE AVE	2		0345	94134	1
CA001000968	003	SUNNYDALE	030280	1865	SUNNYDALE AVE	2		0345	94134	1
CA001000968	003	SUNNYDALE	030281	1867	SUNNYDALE AVE	2		0345	94134	1
CA001000968	003	SUNNYDALE	030282	1869	SUNNYDALE AVE	2		0345	94134	1
CA001000968	003	SUNNYDALE	030283	1871	SUNNYDALE AVE	3		0345	94134	1
CA001000968	003	SUNNYDALE	030284	1873	SUNNYDALE AVE	2		0345	94134	1
CA001000968	003	SUNNYDALE	030285	1901	SUNNYDALE AVE	2		0346	94134	1
CA001000968	003	SUNNYDALE	030286	1903	SUNNYDALE AVE	3		0346	94134	1
CA001000968	003	SUNNYDALE	030287	1905	SUNNYDALE AVE	2		0346	94134	1
CA001000968	003	SUNNYDALE	030288	1907	SUNNYDALE AVE	2		0346	94134	1
CA001000968	003	SUNNYDALE	030289	1909	SUNNYDALE AVE	2		0346	94134	1
CA001000968	003	SUNNYDALE	030290	1911	SUNNYDALE AVE	2		0346	94134	1
CA001000968	003	SUNNYDALE	030291	1913	SUNNYDALE AVE	2		0346	94134	1
CA001000968	003	SUNNYDALE	030292	1915	SUNNYDALE AVE	2		0346	94134	1
CA001000968	003	SUNNYDALE	030293	1917	SUNNYDALE AVE	2		0346	94134	1
CA001000968	003	SUNNYDALE	030294	1919	SUNNYDALE AVE	3		0346	94134	1
CA001000968	003	SUNNYDALE	030295	1921	SUNNYDALE AVE	2		0346	94134	1
CA001000968	003	SUNNYDALE	030296	1923	SUNNYDALE AVE	2		0346	94134	1
CA001000968	003	SUNNYDALE	030297	1925	SUNNYDALE AVE	2		0347	94134	1
CA001000968	003	SUNNYDALE	030298	1927	SUNNYDALE AVE	2		0347	94134	1
CA001000968	003	SUNNYDALE	030299	1929	SUNNYDALE AVE	3		0347	94134	1
CA001000968	003	SUNNYDALE	030300	1931	SUNNYDALE AVE	2		0347	94134	1
CA001000968	003	SUNNYDALE	030301	1933	SUNNYDALE AVE	2		0347	94134	1
CA001000968	003	SUNNYDALE	030302	1935	SUNNYDALE AVE	2		0347	94134	1
CA001000968	003	SUNNYDALE	030303	1937	SUNNYDALE AVE	2		0347	94134	1
CA001000968	003	SUNNYDALE	030304	1939	SUNNYDALE AVE	2		0347	94134	1
CA001000968	003	SUNNYDALE	030305	1941	SUNNYDALE AVE	2		0347	94134	1
CA001000968	003	SUNNYDALE	030306	1943	SUNNYDALE AVE	2		0347	94134	1
CA001000968	003	SUNNYDALE	030307	1945	SUNNYDALE AVE	3		0347	94134	1
CA001000968	003	SUNNYDALE	030308	1947	SUNNYDALE AVE	2		0347	94134	1
CA001000968	003	SUNNYDALE	030309	1949	SUNNYDALE AVE	2		0348	94134	1
CA001000968	003	SUNNYDALE	030310	1951	SUNNYDALE AVE	3		0348	94134	1
CA001000968	003	SUNNYDALE	030311	1953	SUNNYDALE AVE	2		0348	94134	1
CA001000968	003	SUNNYDALE	030312	1955	SUNNYDALE AVE	2		0348	94134	1
CA001000968	003	SUNNYDALE	030313	1957	SUNNYDALE AVE	2		0348	94134	1
CA001000968	003	SUNNYDALE	030314	1959	SUNNYDALE AVE	2		0348	94134	1
CA001000968	003	SUNNYDALE	030315	1961	SUNNYDALE AVE	2		0348	94134	1
CA001000968	003	SUNNYDALE	030316	1963	SUNNYDALE AVE	2		0348	94134	1
CA001000968	003	SUNNYDALE	030317	1965	SUNNYDALE AVE	2		0348	94134	1
CA001000968	003	SUNNYDALE	030318	1967	SUNNYDALE AVE	3		0348	94134	1
CA001000968	003	SUNNYDALE	030319	1969	SUNNYDALE AVE	2		0348	94134	1
CA001000968	003	SUNNYDALE	030320	1971	SUNNYDALE AVE	2		0348	94134	1
CA001000968	003	SUNNYDALE	030321	170	HAHN ST	2		0317	94134	1
CA001000968	003	SUNNYDALE	030322	172	HAHN ST	3		0317	94134	1
CA001000968	003	SUNNYDALE	030323	174	HAHN ST	2		0317	94134	1

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CA No.	Dev. No.	Development Name	Unit No.	Unit Address		Bdrm Size	Apt No.	Bldg No.	Zip Code	Count
CA001000968	003	SUNNYDALE	030324	176	HAHN ST	2		0317	94134	1
CA001000968	003	SUNNYDALE	030325	220	HAHN ST	1		0328	94134	1
CA001000968	003	SUNNYDALE	030326	222	HAHN ST	4		0328	94134	1
CA001000968	003	SUNNYDALE	030327	224	HAHN ST	2		0328	94134	1
CA001000968	003	SUNNYDALE	030328	226	HAHN ST	1		0328	94134	1
CA001000968	003	SUNNYDALE	030330	230	HAHN ST	5		0328	94134	1
CA001000968	003	SUNNYDALE	030332	234	HAHN ST	5		0328	94134	1
CA001000968	003	SUNNYDALE	030333	236	HAHN ST	1		0328	94134	1
CA001000968	003	SUNNYDALE	030334	238	HAHN ST	4		0328	94134	1
CA001000968	003	SUNNYDALE	030335	240	HAHN ST	2		0328	94134	1
CA001000968	003	SUNNYDALE	030336	242	HAHN ST	1		0328	94134	1
CA001000968	003	SUNNYDALE	030337	1	SANTOS	2		0338	94134	1
CA001000968	003	SUNNYDALE	030338	3	SANTOS	2		0338	94134	1
CA001000968	003	SUNNYDALE	030339	5	SANTOS	3		0338	94134	1
CA001000968	003	SUNNYDALE	030340	7	SANTOS	2		0338	94134	1
CA001000968	003	SUNNYDALE	030341	9	SANTOS	2		0338	94134	1
CA001000968	003	SUNNYDALE	030342	11	SANTOS	2		0338	94134	1
CA001000968	003	SUNNYDALE	030343	13	SANTOS	3		0338	94134	1
CA001000968	003	SUNNYDALE	030344	15	SANTOS	2		0338	94134	1
CA001000968	003	SUNNYDALE	030345	21	SANTOS	2		0337	94134	1
CA001000968	003	SUNNYDALE	030346	23	SANTOS	2		0337	94134	1
CA001000968	003	SUNNYDALE	030347	25	SANTOS	3		0337	94134	1
CA001000968	003	SUNNYDALE	030348	27	SANTOS	2		0337	94134	1
CA001000968	003	SUNNYDALE	030349	29	SANTOS	2		0337	94134	1
CA001000968	003	SUNNYDALE	030350	31	SANTOS	2		0337	94134	1
CA001000968	003	SUNNYDALE	030351	33	SANTOS	2		0337	94134	1
CA001000968	003	SUNNYDALE	030352	35	SANTOS	2		0337	94134	1
CA001000968	003	SUNNYDALE	030353	37	SANTOS	2		0337	94134	1
CA001000968	003	SUNNYDALE	030354	39	SANTOS	2		0337	94134	1
CA001000968	003	SUNNYDALE	030355	41	SANTOS	3		0337	94134	1
CA001000968	003	SUNNYDALE	030356	43	SANTOS	2		0337	94134	1
CA001000968	003	SUNNYDALE	030357	51	SANTOS	2		0336	94134	1
CA001000968	003	SUNNYDALE	030358	53	SANTOS	2		0336	94134	1
CA001000968	003	SUNNYDALE	030359	55	SANTOS	3		0336	94134	1
CA001000968	003	SUNNYDALE	030360	57	SANTOS	2		0336	94134	1
CA001000968	003	SUNNYDALE	030361	59	SANTOS	2		0336	94134	1
CA001000968	003	SUNNYDALE	030362	61	SANTOS	2		0336	94134	1
CA001000968	003	SUNNYDALE	030363	63	SANTOS	3		0336	94134	1
CA001000968	003	SUNNYDALE	030364	65	SANTOS	2		0336	94134	1
CA001000968	003	SUNNYDALE	030365	101	SANTOS	1		0385	94134	1
CA001000968	003	SUNNYDALE	030366	103	SANTOS	1		0385	94134	1
CA001000968	003	SUNNYDALE	030367	105	SANTOS	1		0385	94134	1
CA001000968	003	SUNNYDALE	030368	107	SANTOS	1		0385	94134	1
CA001000968	003	SUNNYDALE	030369	109	SANTOS	1		0385	94134	1
CA001000968	003	SUNNYDALE	030370	111	SANTOS	1		0385	94134	1

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CA No.	Dev. No.	Development Name	Unit No.	Unit Address	Bdrm Size	Apt No.	Bldg No.	Zip Code	Count
CA001000968	003	SUNNYDALE	030371	115 SANTOS	3		0384	94134	1
CA001000968	003	SUNNYDALE	030372	117 SANTOS	1		0384	94134	1
CA001000968	003	SUNNYDALE	030373	119 SANTOS	1		0384	94134	1
CA001000968	003	SUNNYDALE	030374	121 SANTOS	1		0384	94134	1
CA001000968	003	SUNNYDALE	030375	123 SANTOS	1		0384	94134	1
CA001000968	003	SUNNYDALE	030376	125 SANTOS	1		0384	94134	1
CA001000968	003	SUNNYDALE	030378	129 SANTOS	1		0384	94134	1
CA001000968	003	SUNNYDALE	030379	112 SANTOS	1		0383	94134	1
CA001000968	003	SUNNYDALE	030380	110 SANTOS	1		0383	94134	1
CA001000968	003	SUNNYDALE	030381	100 SANTOS	1		0383	94134	1
CA001000968	003	SUNNYDALE	030382	64 SANTOS	2		0366	94134	1
CA001000968	003	SUNNYDALE	030383	62 SANTOS	2		0366	94134	1
CA001000968	003	SUNNYDALE	030384	60 SANTOS	3		0366	94134	1
CA001000968	003	SUNNYDALE	030385	58 SANTOS	2		0366	94134	1
CA001000968	003	SUNNYDALE	030386	56 SANTOS	2		0366	94134	1
CA001000968	003	SUNNYDALE	030387	54 SANTOS	2		0366	94134	1
CA001000968	003	SUNNYDALE	030388	52 SANTOS	3		0366	94134	1
CA001000968	003	SUNNYDALE	030389	50 SANTOS	2		0366	94134	1
CA001000968	003	SUNNYDALE	030390	42 SANTOS	2		0365	94134	1
CA001000968	003	SUNNYDALE	030391	40 SANTOS	2		0365	94134	1
CA001000968	003	SUNNYDALE	030392	38 SANTOS	3		0365	94134	1
CA001000968	003	SUNNYDALE	030393	36 SANTOS	2		0365	94134	1
CA001000968	003	SUNNYDALE	030394	34 SANTOS	2		0365	94134	1
CA001000968	003	SUNNYDALE	030395	32 SANTOS	2		0365	94134	1
CA001000968	003	SUNNYDALE	030396	30 SANTOS	2		0365	94134	1
CA001000968	003	SUNNYDALE	030397	28 SANTOS	2		0365	94134	1
CA001000968	003	SUNNYDALE	030398	26 SANTOS	2		0365	94134	1
CA001000968	003	SUNNYDALE	030399	24 SANTOS	2		0365	94134	1
CA001000968	003	SUNNYDALE	030400	22 SANTOS	3		0365	94134	1
CA001000968	003	SUNNYDALE	030401	20 SANTOS	2		0365	94134	1
CA001000968	003	SUNNYDALE	030402	16 SANTOS	2		0339	94134	1
CA001000968	003	SUNNYDALE	030403	14 SANTOS	2		0339	94134	1
CA001000968	003	SUNNYDALE	030404	12 SANTOS	3		0339	94134	1
CA001000968	003	SUNNYDALE	030405	10 SANTOS	2		0339	94134	1
CA001000968	003	SUNNYDALE	030406	8 SANTOS	2		0339	94134	1
CA001000968	003	SUNNYDALE	030407	6 SANTOS	2		0339	94134	1
CA001000968	003	SUNNYDALE	030408	4 SANTOS	3		0339	94134	1
CA001000968	003	SUNNYDALE	030409	2 SANTOS	2		0339	94134	1
CA001000968	003	SUNNYDALE	030410	2 BROOKDALE AVE	2		0349	94134	1
CA001000968	003	SUNNYDALE	030411	4 BROOKDALE AVE	3		0349	94134	1
CA001000968	003	SUNNYDALE	030412	6 BROOKDALE AVE	2		0349	94134	1
CA001000968	003	SUNNYDALE	030413	8 BROOKDALE AVE	2		0349	94134	1
CA001000968	003	SUNNYDALE	030414	10 BROOKDALE AVE	2		0349	94134	1
CA001000968	003	SUNNYDALE	030415	12 BROOKDALE AVE	3		0349	94134	1
CA001000968	003	SUNNYDALE	030416	14 BROOKDALE AVE	2		0349	94134	1

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address	Bdrm Size	Apt No.	Bldg No.	Zip Code	Count
CA001000968	003	SUNNYDALE	030417	16 BROOKDALE AVE	2		0349	94134	1
CA001000968	003	SUNNYDALE	030418	30 BROOKDALE AVE	2		0350	94134	1
CA001000968	003	SUNNYDALE	030419	32 BROOKDALE AVE	2		0350	94134	1
CA001000968	003	SUNNYDALE	030420	34 BROOKDALE AVE	3		0350	94134	1
CA001000968	003	SUNNYDALE	030421	36 BROOKDALE AVE	2		0350	94134	1
CA001000968	003	SUNNYDALE	030422	38 BROOKDALE AVE	2		0350	94134	1
CA001000968	003	SUNNYDALE	030423	40 BROOKDALE AVE	2		0350	94134	1
CA001000968	003	SUNNYDALE	030424	42 BROOKDALE AVE	3		0350	94134	1
CA001000968	003	SUNNYDALE	030425	44 BROOKDALE AVE	2		0350	94134	1
CA001000968	003	SUNNYDALE	030426	50 BROOKDALE AVE	2		0351	94134	1
CA001000968	003	SUNNYDALE	030427	52 BROOKDALE AVE	3		0351	94134	1
CA001000968	003	SUNNYDALE	030428	54 BROOKDALE AVE	2		0351	94134	1
CA001000968	003	SUNNYDALE	030429	56 BROOKDALE AVE	2		0351	94134	1
CA001000968	003	SUNNYDALE	030430	58 BROOKDALE AVE	2		0351	94134	1
CA001000968	003	SUNNYDALE	030431	60 BROOKDALE AVE	3		0351	94134	1
CA001000968	003	SUNNYDALE	030432	62 BROOKDALE AVE	2		0351	94134	1
CA001000968	003	SUNNYDALE	030433	64 BROOKDALE AVE	2		0351	94134	1
CA001000968	003	SUNNYDALE	030434	70 BROOKDALE AVE	2		0352	94134	1
CA001000968	003	SUNNYDALE	030435	72 BROOKDALE AVE	2		0352	94134	1
CA001000968	003	SUNNYDALE	030436	74 BROOKDALE AVE	3		0352	94134	1
CA001000968	003	SUNNYDALE	030437	76 BROOKDALE AVE	2		0352	94134	1
CA001000968	003	SUNNYDALE	030438	78 BROOKDALE AVE	2		0352	94134	1
CA001000968	003	SUNNYDALE	030439	80 BROOKDALE AVE	2		0352	94134	1
CA001000968	003	SUNNYDALE	030440	82 BROOKDALE AVE	3		0352	94134	1
CA001000968	003	SUNNYDALE	030441	84 BROOKDALE AVE	2		0352	94134	1
CA001000968	003	SUNNYDALE	030442	100 BROOKDALE AVE	1		0353	94134	1
CA001000968	003	SUNNYDALE	030443	102 BROOKDALE AVE	1		0353	94134	1
CA001000968	003	SUNNYDALE	030444	104 BROOKDALE AVE	1		0353	94134	1
CA001000968	003	SUNNYDALE	030445	106 BROOKDALE AVE	1		0353	94134	1
CA001000968	003	SUNNYDALE	030446	108 BROOKDALE AVE	1		0353	94134	1
CA001000968	003	SUNNYDALE	030447	110 BROOKDALE AVE	1		0353	94134	1
CA001000968	003	SUNNYDALE	030448	112 BROOKDALE AVE	1		0353	94134	1
CA001000968	003	SUNNYDALE	030449	114 BROOKDALE AVE	1		0353	94134	1
CA001000968	003	SUNNYDALE	030451	122 BROOKDALE AVE	1		0354	94134	1
CA001000968	003	SUNNYDALE	030452	124 BROOKDALE AVE	1		0354	94134	1
CA001000968	003	SUNNYDALE	030453	126 BROOKDALE AVE	3		0354	94134	1
CA001000968	003	SUNNYDALE	030454	128 BROOKDALE AVE	1		0354	94134	1
CA001000968	003	SUNNYDALE	030455	130 BROOKDALE AVE	1		0354	94134	1
CA001000968	003	SUNNYDALE	030456	132 BROOKDALE AVE	1		0354	94134	1
CA001000968	003	SUNNYDALE	030457	134 BROOKDALE AVE	1		0354	94134	1
CA001000968	003	SUNNYDALE	030458	136 BROOKDALE AVE	1		0354	94134	1
CA001000968	003	SUNNYDALE	030459	138 BROOKDALE AVE	1		0354	94134	1
CA001000968	003	SUNNYDALE	030460	140 BROOKDALE AVE	1		0354	94134	1
CA001000968	003	SUNNYDALE	030461	144 BROOKDALE AVE	1		0355	94134	1
CA001000968	003	SUNNYDALE	030462	146 BROOKDALE AVE	1		0355	94134	1

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address	Bdrm Size	Apt No.	Bldg No.	Zip Code	Count
CA001000968	003	SUNNYDALE	030463	148 BROOKDALE AVE	1		0355	94134	1
CA001000968	003	SUNNYDALE	030464	150 BROOKDALE AVE	1		0355	94134	1
CA001000968	003	SUNNYDALE	030465	152 BROOKDALE AVE	1		0355	94134	1
CA001000968	003	SUNNYDALE	030466	154 BROOKDALE AVE	1		0355	94134	1
CA001000968	003	SUNNYDALE	030467	156 BROOKDALE AVE	1		0355	94134	1
CA001000968	003	SUNNYDALE	030468	158 BROOKDALE AVE	1		0355	94134	1
CA001000968	003	SUNNYDALE	030469	162 BROOKDALE AVE	4		0356	94134	1
CA001000968	003	SUNNYDALE	030470	164 BROOKDALE AVE	4		0356	94134	1
CA001000968	003	SUNNYDALE	030471	166 BROOKDALE AVE	4		0356	94134	1
CA001000968	003	SUNNYDALE	030472	170 BROOKDALE AVE	4		0357	94134	1
CA001000968	003	SUNNYDALE	030473	172 BROOKDALE AVE	4		0357	94134	1
CA001000968	003	SUNNYDALE	030474	174 BROOKDALE AVE	4		0357	94134	1
CA001000968	003	SUNNYDALE	030475	178 BROOKDALE AVE	4		0358	94134	1
CA001000968	003	SUNNYDALE	030476	180 BROOKDALE AVE	4		0358	94134	1
CA001000968	003	SUNNYDALE	030477	182 BROOKDALE AVE	4		0358	94134	1
CA001000968	003	SUNNYDALE	030478	175 BROOKDALE AVE	1		0375	94134	1
CA001000968	003	SUNNYDALE	030479	173 BROOKDALE AVE	1		0375	94134	1
CA001000968	003	SUNNYDALE	030480	171 BROOKDALE AVE	1		0375	94134	1
CA001000968	003	SUNNYDALE	030481	169 BROOKDALE AVE	1		0375	94134	1
CA001000968	003	SUNNYDALE	030482	167 BROOKDALE AVE	1		0375	94134	1
CA001000968	003	SUNNYDALE	030483	165 BROOKDALE AVE	1		0375	94134	1
CA001000968	003	SUNNYDALE	030484	159 BROOKDALE AVE	3		0374	94134	1
CA001000968	003	SUNNYDALE	030485	157 BROOKDALE AVE	1		0374	94134	1
CA001000968	003	SUNNYDALE	030486	155 BROOKDALE AVE	3		0374	94134	1
CA001000968	003	SUNNYDALE	030488	151 BROOKDALE AVE	1		0374	94134	1
CA001000968	003	SUNNYDALE	030489	149 BROOKDALE AVE	1		0374	94134	1
CA001000968	003	SUNNYDALE	030490	147 BROOKDALE AVE	1		0374	94134	1
CA001000968	003	SUNNYDALE	030491	145 BROOKDALE AVE	1		0374	94134	1
CA001000968	003	SUNNYDALE	030492	131 BROOKDALE AVE	1		0359	94134	1
CA001000968	003	SUNNYDALE	030493	133 BROOKDALE AVE	1		0359	94134	1
CA001000968	003	SUNNYDALE	030494	135 BROOKDALE AVE	1		0359	94134	1
CA001000968	003	SUNNYDALE	030495	137 BROOKDALE AVE	1		0359	94134	1
CA001000968	003	SUNNYDALE	030496	139 BROOKDALE AVE	1		0359	94134	1
CA001000968	003	SUNNYDALE	030497	141 BROOKDALE AVE	3		0359	94134	1
CA001000968	003	SUNNYDALE	030498	127 BROOKDALE AVE	1		0359	94134	1
CA001000968	003	SUNNYDALE	030500	101 BROOKDALE AVE	2		0360	94134	1
CA001000968	003	SUNNYDALE	030501	103 BROOKDALE AVE	2		0360	94134	1
CA001000968	003	SUNNYDALE	030502	105 BROOKDALE AVE	3		0360	94134	1
CA001000968	003	SUNNYDALE	030503	107 BROOKDALE AVE	2		0360	94134	1
CA001000968	003	SUNNYDALE	030504	109 BROOKDALE AVE	2		0360	94134	1
CA001000968	003	SUNNYDALE	030505	111 BROOKDALE AVE	2		0360	94134	1
CA001000968	003	SUNNYDALE	030506	113 BROOKDALE AVE	2		0360	94134	1
CA001000968	003	SUNNYDALE	030507	115 BROOKDALE AVE	2		0360	94134	1
CA001000968	003	SUNNYDALE	030508	117 BROOKDALE AVE	2		0360	94134	1
CA001000968	003	SUNNYDALE	030509	119 BROOKDALE AVE	2		0360	94134	1

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address		Bdrm Size	Apt No.	Bldg No.	Zip Code	Count
CA001000968	003	SUNNYDALE	030510	121	BROOKDALE AVE	3		0360	94134	1
CA001000968	003	SUNNYDALE	030511	123	BROOKDALE AVE	2		0360	94134	1
CA001000968	003	SUNNYDALE	030512	73	BROOKDALE AVE	2		0361	94134	1
CA001000968	003	SUNNYDALE	030513	75	BROOKDALE AVE	3		0361	94134	1
CA001000968	003	SUNNYDALE	030514	77	BROOKDALE AVE	2		0361	94134	1
CA001000968	003	SUNNYDALE	030515	79	BROOKDALE AVE	2		0361	94134	1
CA001000968	003	SUNNYDALE	030516	81	BROOKDALE AVE	2		0361	94134	1
CA001000968	003	SUNNYDALE	030517	83	BROOKDALE AVE	2		0361	94134	1
CA001000968	003	SUNNYDALE	030518	85	BROOKDALE AVE	2		0361	94134	1
CA001000968	003	SUNNYDALE	030519	87	BROOKDALE AVE	2		0361	94134	1
CA001000968	003	SUNNYDALE	030520	89	BROOKDALE AVE	2		0361	94134	1
CA001000968	003	SUNNYDALE	030521	91	BROOKDALE AVE	3		0361	94134	1
CA001000968	003	SUNNYDALE	030522	93	BROOKDALE AVE	2		0361	94134	1
CA001000968	003	SUNNYDALE	030523	95	BROOKDALE AVE	2		0361	94134	1
CA001000968	003	SUNNYDALE	030524	49	BROOKDALE AVE	2		0362	94134	1
CA001000968	003	SUNNYDALE	030525	51	BROOKDALE AVE	2		0362	94134	1
CA001000968	003	SUNNYDALE	030526	53	BROOKDALE AVE	3		0362	94134	1
CA001000968	003	SUNNYDALE	030527	55	BROOKDALE AVE	2		0362	94134	1
CA001000968	003	SUNNYDALE	030528	57	BROOKDALE AVE	2		0362	94134	1
CA001000968	003	SUNNYDALE	030529	59	BROOKDALE AVE	2		0362	94134	1
CA001000968	003	SUNNYDALE	030530	61	BROOKDALE AVE	2		0362	94134	1
CA001000968	003	SUNNYDALE	030531	63	BROOKDALE AVE	2		0362	94134	1
CA001000968	003	SUNNYDALE	030532	65	BROOKDALE AVE	2		0362	94134	1
CA001000968	003	SUNNYDALE	030533	67	BROOKDALE AVE	2		0362	94134	1
CA001000968	003	SUNNYDALE	030534	69	BROOKDALE AVE	3		0362	94134	1
CA001000968	003	SUNNYDALE	030535	71	BROOKDALE AVE	2		0362	94134	1
CA001000968	003	SUNNYDALE	030536	25	BROOKDALE AVE	2		0363	94134	1
CA001000968	003	SUNNYDALE	030537	27	BROOKDALE AVE	3		0363	94134	1
CA001000968	003	SUNNYDALE	030538	29	BROOKDALE AVE	2		0363	94134	1
CA001000968	003	SUNNYDALE	030539	31	BROOKDALE AVE	2		0363	94134	1
CA001000968	003	SUNNYDALE	030540	33	BROOKDALE AVE	2		0363	94134	1
CA001000968	003	SUNNYDALE	030541	35	BROOKDALE AVE	2		0363	94134	1
CA001000968	003	SUNNYDALE	030542	37	BROOKDALE AVE	2		0363	94134	1
CA001000968	003	SUNNYDALE	030543	39	BROOKDALE AVE	2		0363	94134	1
CA001000968	003	SUNNYDALE	030544	41	BROOKDALE AVE	2		0363	94134	1
CA001000968	003	SUNNYDALE	030545	43	BROOKDALE AVE	3		0363	94134	1
CA001000968	003	SUNNYDALE	030546	45	BROOKDALE AVE	2		0363	94134	1
CA001000968	003	SUNNYDALE	030547	47	BROOKDALE AVE	2		0363	94134	1
CA001000968	003	SUNNYDALE	030548	1	BROOKDALE AVE	2		0364	94134	1
CA001000968	003	SUNNYDALE	030549	3	BROOKDALE AVE	2		0364	94134	1
CA001000968	003	SUNNYDALE	030550	5	BROOKDALE AVE	3		0364	94134	1
CA001000968	003	SUNNYDALE	030551	7	BROOKDALE AVE	2		0364	94134	1
CA001000968	003	SUNNYDALE	030552	9	BROOKDALE AVE	2		0364	94134	1
CA001000968	003	SUNNYDALE	030553	11	BROOKDALE AVE	2		0364	94134	1
CA001000968	003	SUNNYDALE	030554	13	BROOKDALE AVE	2		0364	94134	1

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CA No.	Dev. No.	Development Name	Unit No.	Unit Address	Bdrm Size	Apt No.	Bldg No.	Zip Code	Count
CA001000968	003	SUNNYDALE	030555	15 BROOKDALE AVE	2		0364	94134	1
CA001000968	003	SUNNYDALE	030556	17 BROOKDALE AVE	2		0364	94134	1
CA001000968	003	SUNNYDALE	030557	19 BROOKDALE AVE	2		0364	94134	1
CA001000968	003	SUNNYDALE	030558	21 BROOKDALE AVE	3		0364	94134	1
CA001000968	003	SUNNYDALE	030559	23 BROOKDALE AVE	2		0364	94134	1
CA001000968	003	SUNNYDALE	030560	2 BLYTHDALE AVE	2		0329	94134	1
CA001000968	003	SUNNYDALE	030561	4 BLYTHDALE AVE	3		0329	94134	1
CA001000968	003	SUNNYDALE	030562	6 BLYTHDALE AVE	2		0329	94134	1
CA001000968	003	SUNNYDALE	030563	8 BLYTHDALE AVE	2		0329	94134	1
CA001000968	003	SUNNYDALE	030564	10 BLYTHDALE AVE	2		0329	94134	1
CA001000968	003	SUNNYDALE	030565	12 BLYTHDALE AVE	3		0329	94134	1
CA001000968	003	SUNNYDALE	030566	14 BLYTHDALE AVE	2		0329	94134	1
CA001000968	003	SUNNYDALE	030567	16 BLYTHDALE AVE	2		0329	94134	1
CA001000968	003	SUNNYDALE	030568	18 BLYTHDALE AVE	2		0330	94134	1
CA001000968	003	SUNNYDALE	030569	20 BLYTHDALE AVE	3		0330	94134	1
CA001000968	003	SUNNYDALE	030570	22 BLYTHDALE AVE	2		0330	94134	1
CA001000968	003	SUNNYDALE	030571	24 BLYTHDALE AVE	2		0330	94134	1
CA001000968	003	SUNNYDALE	030572	26 BLYTHDALE AVE	2		0330	94134	1
CA001000968	003	SUNNYDALE	030573	28 BLYTHDALE AVE	3		0330	94134	1
CA001000968	003	SUNNYDALE	030574	30 BLYTHDALE AVE	2		0330	94134	1
CA001000968	003	SUNNYDALE	030575	32 BLYTHDALE AVE	2		0330	94134	1
CA001000968	003	SUNNYDALE	030576	34 BLYTHDALE AVE	2		0331	94134	1
CA001000968	003	SUNNYDALE	030577	36 BLYTHDALE AVE	3		0331	94134	1
CA001000968	003	SUNNYDALE	030578	38 BLYTHDALE AVE	2		0331	94134	1
CA001000968	003	SUNNYDALE	030579	40 BLYTHDALE AVE	2		0331	94134	1
CA001000968	003	SUNNYDALE	030580	42 BLYTHDALE AVE	2		0332	94134	1
CA001000968	003	SUNNYDALE	030581	44 BLYTHDALE AVE	3		0332	94134	1
CA001000968	003	SUNNYDALE	030582	46 BLYTHDALE AVE	2		0332	94134	1
CA001000968	003	SUNNYDALE	030583	48 BLYTHDALE AVE	2		0332	94134	1
CA001000968	003	SUNNYDALE	030584	50 BLYTHDALE AVE	2		0332	94134	1
CA001000968	003	SUNNYDALE	030585	52 BLYTHDALE AVE	3		0332	94134	1
CA001000968	003	SUNNYDALE	030586	54 BLYTHDALE AVE	2		0332	94134	1
CA001000968	003	SUNNYDALE	030587	56 BLYTHDALE AVE	2		0332	94134	1
CA001000968	003	SUNNYDALE	030588	58 BLYTHDALE AVE	2		0333	94134	1
CA001000968	003	SUNNYDALE	030589	60 BLYTHDALE AVE	3		0333	94134	1
CA001000968	003	SUNNYDALE	030590	62 BLYTHDALE AVE	2		0333	94134	1
CA001000968	003	SUNNYDALE	030591	64 BLYTHDALE AVE	2		0333	94134	1
CA001000968	003	SUNNYDALE	030592	66 BLYTHDALE AVE	2		0334	94134	1
CA001000968	003	SUNNYDALE	030593	68 BLYTHDALE AVE	3		0334	94134	1
CA001000968	003	SUNNYDALE	030594	70 BLYTHDALE AVE	2		0334	94134	1
CA001000968	003	SUNNYDALE	030595	72 BLYTHDALE AVE	2		0334	94134	1
CA001000968	003	SUNNYDALE	030596	74 BLYTHDALE AVE	2		0334	94134	1
CA001000968	003	SUNNYDALE	030597	76 BLYTHDALE AVE	3		0334	94134	1
CA001000968	003	SUNNYDALE	030598	78 BLYTHDALE AVE	2		0334	94134	1
CA001000968	003	SUNNYDALE	030599	80 BLYTHDALE AVE	2		0334	94134	1

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CA No.	Dev. No.	Development Name	Unit No.	Unit Address	Bdrm Size	Apt No.	Bldg No.	Zip Code	Count
CA001000968	003	SUNNYDALE	030600	82 BLYTHDALE AVE	2		0335	94134	1
CA001000968	003	SUNNYDALE	030601	84 BLYTHDALE AVE	3		0335	94134	1
CA001000968	003	SUNNYDALE	030602	86 BLYTHDALE AVE	2		0335	94134	1
CA001000968	003	SUNNYDALE	030603	88 BLYTHDALE AVE	2		0335	94134	1
CA001000968	003	SUNNYDALE	030604	90 BLYTHDALE AVE	2		0335	94134	1
CA001000968	003	SUNNYDALE	030605	92 BLYTHDALE AVE	2		0335	94134	1
CA001000968	003	SUNNYDALE	030606	94 BLYTHDALE AVE	2		0335	94134	1
CA001000968	003	SUNNYDALE	030607	94-A BLYTHDALE AVE	2		0335	94134	1
CA001000968	003	SUNNYDALE	030608	96 BLYTHDALE AVE	2		0335	94134	1
CA001000968	003	SUNNYDALE	030609	96 A BLYTHDALE AVE	3		0335	94134	1
CA001000968	003	SUNNYDALE	030610	98 BLYTHDALE AVE	2		0335	94134	1
CA001000968	003	SUNNYDALE	030611	98 A BLYTHDALE AVE	2		0335	94134	1
CA001000968	003	SUNNYDALE	030612	120 BLYTHDALE AVE	2		0367	94134	1
CA001000968	003	SUNNYDALE	030613	122 BLYTHDALE AVE	3		0367	94134	1
CA001000968	003	SUNNYDALE	030614	124 BLYTHDALE AVE	2		0367	94134	1
CA001000968	003	SUNNYDALE	030615	126 BLYTHDALE AVE	2		0367	94134	1
CA001000968	003	SUNNYDALE	030616	128 BLYTHDALE AVE	2		0367	94134	1
CA001000968	003	SUNNYDALE	030617	130 BLYTHDALE AVE	3		0367	94134	1
CA001000968	003	SUNNYDALE	030618	132 BLYTHDALE AVE	2		0367	94134	1
CA001000968	003	SUNNYDALE	030619	134 BLYTHDALE AVE	2		0367	94134	1
CA001000968	003	SUNNYDALE	030620	140 BLYTHDALE AVE	2		0368	94134	1
CA001000968	003	SUNNYDALE	030621	142 BLYTHDALE AVE	2		0368	94134	1
CA001000968	003	SUNNYDALE	030622	144 BLYTHDALE AVE	3		0368	94134	1
CA001000968	003	SUNNYDALE	030623	146 BLYTHDALE AVE	2		0368	94134	1
CA001000968	003	SUNNYDALE	030624	148 BLYTHDALE AVE	2		0368	94134	1
CA001000968	003	SUNNYDALE	030625	150 BLYTHDALE AVE	2		0368	94134	1
CA001000968	003	SUNNYDALE	030626	152 BLYTHDALE AVE	3		0368	94134	1
CA001000968	003	SUNNYDALE	030627	154 BLYTHDALE AVE	2		0368	94134	1
CA001000968	003	SUNNYDALE	030628	160 BLYTHDALE AVE	2		0369	94134	1
CA001000968	003	SUNNYDALE	030629	162 BLYTHDALE AVE	3		0369	94134	1
CA001000968	003	SUNNYDALE	030630	164 BLYTHDALE AVE	2		0369	94134	1
CA001000968	003	SUNNYDALE	030631	166 BLYTHDALE AVE	2		0369	94134	1
CA001000968	003	SUNNYDALE	030632	168 BLYTHDALE AVE	2		0369	94134	1
CA001000968	003	SUNNYDALE	030633	170 BLYTHDALE AVE	3		0369	94134	1
CA001000968	003	SUNNYDALE	030634	172 BLYTHDALE AVE	2		0369	94134	1
CA001000968	003	SUNNYDALE	030635	174 BLYTHDALE AVE	2		0369	94134	1
CA001000968	003	SUNNYDALE	030636	200 BLYTHDALE AVE	2		0370	94134	1
CA001000968	003	SUNNYDALE	030637	202 BLYTHDALE AVE	2		0370	94134	1
CA001000968	003	SUNNYDALE	030638	204 BLYTHDALE AVE	3		0370	94134	1
CA001000968	003	SUNNYDALE	030639	206 BLYTHDALE AVE	2		0370	94134	1
CA001000968	003	SUNNYDALE	030640	208 BLYTHDALE AVE	2		0370	94134	1
CA001000968	003	SUNNYDALE	030641	210 BLYTHDALE AVE	2		0370	94134	1
CA001000968	003	SUNNYDALE	030642	212 BLYTHDALE AVE	3		0370	94134	1
CA001000968	003	SUNNYDALE	030643	214 BLYTHDALE AVE	2		0370	94134	1
CA001000968	003	SUNNYDALE	030644	220 BLYTHDALE AVE	2		0371	94134	1

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address	Bdrm Size	Apt No.	Bldg No.	Zip Code	Count
CA001000968	003	SUNNYDALE	030645	222 BLYTHDALE AVE	3		0371	94134	1
CA001000968	003	SUNNYDALE	030646	224 BLYTHDALE AVE	2		0371	94134	1
CA001000968	003	SUNNYDALE	030647	226 BLYTHDALE AVE	2		0371	94134	1
CA001000968	003	SUNNYDALE	030648	228 BLYTHDALE AVE	2		0371	94134	1
CA001000968	003	SUNNYDALE	030649	230 BLYTHDALE AVE	3		0371	94134	1
CA001000968	003	SUNNYDALE	030650	232 BLYTHDALE AVE	2		0371	94134	1
CA001000968	003	SUNNYDALE	030651	234 BLYTHDALE AVE	2		0371	94134	1
CA001000968	003	SUNNYDALE	030652	240 BLYTHDALE AVE	4		0372	94134	1
CA001000968	003	SUNNYDALE	030653	242 BLYTHDALE AVE	4		0372	94134	1
CA001000968	003	SUNNYDALE	030654	244 BLYTHDALE AVE	4		0372	94134	1
CA001000968	003	SUNNYDALE	030655	250 BLYTHDALE AVE	4		0373	94134	1
CA001000968	003	SUNNYDALE	030656	252 BLYTHDALE AVE	4		0373	94134	1
CA001000968	003	SUNNYDALE	030657	254 BLYTHDALE AVE	4		0373	94134	1
CA001000968	003	SUNNYDALE	030659	262 BLYTHDALE AVE	1		0374	94134	1
CA001000968	003	SUNNYDALE	030660	264 BLYTHDALE AVE	1		0374	94134	1
CA001000968	003	SUNNYDALE	030661	283 BLYTHDALE AVE	1		0375	94134	1
CA001000968	003	SUNNYDALE	030662	281 BLYTHDALE AVE	1		0375	94134	1
CA001000968	003	SUNNYDALE	030663	261 BLYTHDALE AVE	2		0376	94134	1
CA001000968	003	SUNNYDALE	030664	263 BLYTHDALE AVE	2		0376	94134	1
CA001000968	003	SUNNYDALE	030665	265 BLYTHDALE AVE	3		0376	94134	1
CA001000968	003	SUNNYDALE	030666	267 BLYTHDALE AVE	2		0376	94134	1
CA001000968	003	SUNNYDALE	030667	269 BLYTHDALE AVE	2		0376	94134	1
CA001000968	003	SUNNYDALE	030668	271 BLYTHDALE AVE	2		0376	94134	1
CA001000968	003	SUNNYDALE	030669	273 BLYTHDALE AVE	3		0376	94134	1
CA001000968	003	SUNNYDALE	030670	275 BLYTHDALE AVE	2		0376	94134	1
CA001000968	003	SUNNYDALE	030671	241 BLYTHDALE AVE	2		0377	94134	1
CA001000968	003	SUNNYDALE	030672	243 BLYTHDALE AVE	3		0377	94134	1
CA001000968	003	SUNNYDALE	030673	245 BLYTHDALE AVE	2		0377	94134	1
CA001000968	003	SUNNYDALE	030674	247 BLYTHDALE AVE	2		0377	94134	1
CA001000968	003	SUNNYDALE	030675	249 BLYTHDALE AVE	2		0377	94134	1
CA001000968	003	SUNNYDALE	030676	251 BLYTHDALE AVE	3		0377	94134	1
CA001000968	003	SUNNYDALE	030677	253 BLYTHDALE AVE	2		0377	94134	1
CA001000968	003	SUNNYDALE	030678	255 BLYTHDALE AVE	2		0377	94134	1
CA001000968	003	SUNNYDALE	030679	221 BLYTHDALE AVE	2		0378	94134	1
CA001000968	003	SUNNYDALE	030679	223 BLYTHDALE AVE	2		0378	94134	1
CA001000968	003	SUNNYDALE	030680	225 BLYTHDALE AVE	3		0378	94134	1
CA001000968	003	SUNNYDALE	030681	227 BLYTHDALE AVE	2		0378	94134	1
CA001000968	003	SUNNYDALE	030682	229 BLYTHDALE AVE	2		0378	94134	1
CA001000968	003	SUNNYDALE	030683	231 BLYTHDALE AVE	2		0378	94134	1
CA001000968	003	SUNNYDALE	030684	233 BLYTHDALE AVE	3		0378	94134	1
CA001000968	003	SUNNYDALE	030685	235 BLYTHDALE AVE	2		0378	94134	1
CA001000968	003	SUNNYDALE	030687	201 BLYTHDALE AVE	2		0379	94134	1
CA001000968	003	SUNNYDALE	030688	203 BLYTHDALE AVE	3		0379	94134	1
CA001000968	003	SUNNYDALE	030689	205 BLYTHDALE AVE	2		0379	94134	1
CA001000968	003	SUNNYDALE	030690	207 BLYTHDALE AVE	2		0379	94134	1

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address	Bdrm Size	Apt No.	Bldg No.	Zip Code	Count
CA001000968	003	SUNNYDALE	030691	209 BLYTHDALE AVE	2		0379	94134	1
CA001000968	003	SUNNYDALE	030692	211 BLYTHDALE AVE	3		0379	94134	1
CA001000968	003	SUNNYDALE	030693	213 BLYTHDALE AVE	2		0379	94134	1
CA001000968	003	SUNNYDALE	030694	215 BLYTHDALE AVE	2		0379	94134	1
CA001000968	003	SUNNYDALE	030695	173 BLYTHDALE AVE	2		0380	94134	1
CA001000968	003	SUNNYDALE	030696	175 BLYTHDALE AVE	2		0380	94134	1
CA001000968	003	SUNNYDALE	030697	177 BLYTHDALE AVE	3		0380	94134	1
CA001000968	003	SUNNYDALE	030698	179 BLYTHDALE AVE	2		0380	94134	1
CA001000968	003	SUNNYDALE	030699	181 BLYTHDALE AVE	2		0380	94134	1
CA001000968	003	SUNNYDALE	030700	183 BLYTHDALE AVE	2		0380	94134	1
CA001000968	003	SUNNYDALE	030701	185 BLYTHDALE AVE	3		0380	94134	1
CA001000968	003	SUNNYDALE	030702	187 BLYTHDALE AVE	2		0380	94134	1
CA001000968	003	SUNNYDALE	030703	147 BLYTHDALE AVE	2		0381	94134	1
CA001000968	003	SUNNYDALE	030704	149 BLYTHDALE AVE	3		0381	94134	1
CA001000968	003	SUNNYDALE	030705	151 BLYTHDALE AVE	2		0381	94134	1
CA001000968	003	SUNNYDALE	030706	153 BLYTHDALE AVE	2		0381	94134	1
CA001000968	003	SUNNYDALE	030707	155 BLYTHDALE AVE	2		0381	94134	1
CA001000968	003	SUNNYDALE	030708	157 BLYTHDALE AVE	2		0381	94134	1
CA001000968	003	SUNNYDALE	030709	159 BLYTHDALE AVE	2		0381	94134	1
CA001000968	003	SUNNYDALE	030710	161 BLYTHDALE AVE	2		0381	94134	1
CA001000968	003	SUNNYDALE	030711	163 BLYTHDALE AVE	2		0381	94134	1
CA001000968	003	SUNNYDALE	030712	165 BLYTHDALE AVE	3		0381	94134	1
CA001000968	003	SUNNYDALE	030713	167 BLYTHDALE AVE	2		0381	94134	1
CA001000968	003	SUNNYDALE	030714	169 BLYTHDALE AVE	2		0381	94134	1
CA001000968	003	SUNNYDALE	030715	121 BLYTHDALE AVE	2		0382	94134	1
CA001000968	003	SUNNYDALE	030716	123 BLYTHDALE AVE	2		0382	94134	1
CA001000968	003	SUNNYDALE	030717	125 BLYTHDALE AVE	3		0382	94134	1
CA001000968	003	SUNNYDALE	030718	127 BLYTHDALE AVE	2		0382	94134	1
CA001000968	003	SUNNYDALE	030719	129 BLYTHDALE AVE	2		0382	94134	1
CA001000968	003	SUNNYDALE	030720	131 BLYTHDALE AVE	2		0382	94134	1
CA001000968	003	SUNNYDALE	030721	133 BLYTHDALE AVE	2		0382	94134	1
CA001000968	003	SUNNYDALE	030722	135 BLYTHDALE AVE	2		0382	94134	1
CA001000968	003	SUNNYDALE	030723	137 BLYTHDALE AVE	2		0382	94134	1
CA001000968	003	SUNNYDALE	030724	139 BLYTHDALE AVE	2		0382	94134	1
CA001000968	003	SUNNYDALE	030725	141 BLYTHDALE AVE	3		0382	94134	1
CA001000968	003	SUNNYDALE	030726	143 BLYTHDALE AVE	2		0382	94134	1
CA001000968	003	SUNNYDALE	030727	101 BLYTHDALE AVE	1		0383	94134	1
CA001000968	003	SUNNYDALE	030728	103 BLYTHDALE AVE	1		0383	94134	1
CA001000968	003	SUNNYDALE	030729	105 BLYTHDALE AVE	1		0383	94134	1
CA001000968	003	SUNNYDALE	030730	107 BLYTHDALE AVE	1		0383	94134	1
CA001000968	003	SUNNYDALE	030731	109 BLYTHDALE AVE	1		0383	94134	1
CA001000968	003	SUNNYDALE	030732	111 BLYTHDALE AVE	1		0383	94134	1
CA001000968	003	SUNNYDALE	030733	113 BLYTHDALE AVE	1		0383	94134	1
CA001000968	003	SUNNYDALE	030734	115 BLYTHDALE AVE	1		0383	94134	1
CA001000968	003	SUNNYDALE	030735	85 BLYTHDALE AVE	1		0385	94134	1

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address	Bdrm Size	Apt No.	Bldg No.	Zip Code	Count
CA001000968	003	SUNNYDALE	030736	87 BLYTHDALE AVE	1		0385	94134	1
CA001000968	003	SUNNYDALE	030737	65 BLYTHDALE AVE	2		0386	94134	1
CA001000968	003	SUNNYDALE	030738	67 BLYTHDALE AVE	2		0387	94134	1
CA001000968	003	SUNNYDALE	030739	69 BLYTHDALE AVE	3		0388	94134	1
CA001000968	003	SUNNYDALE	030740	71 BLYTHDALE AVE	2		0389	94134	1
CA001000968	003	SUNNYDALE	030741	73 BLYTHDALE AVE	2		0390	94134	1
CA001000968	003	SUNNYDALE	030742	75 BLYTHDALE AVE	2		0391	94134	1
CA001000968	003	SUNNYDALE	030743	77 BLYTHDALE AVE	3		0392	94134	1
CA001000968	003	SUNNYDALE	030744	79 BLYTHDALE AVE	2		0393	94134	1
CA001000968	003	SUNNYDALE	030745	45 BLYTHDALE AVE	2		0387	94134	1
CA001000968	003	SUNNYDALE	030746	47 BLYTHDALE AVE	2		0388	94134	1
CA001000968	003	SUNNYDALE	030747	49 BLYTHDALE AVE	3		0389	94134	1
CA001000968	003	SUNNYDALE	030748	51 BLYTHDALE AVE	2		0390	94134	1
CA001000968	003	SUNNYDALE	030749	53 BLYTHDALE AVE	2		0391	94134	1
CA001000968	003	SUNNYDALE	030750	55 BLYTHDALE AVE	2		0392	94134	1
CA001000968	003	SUNNYDALE	030751	57 BLYTHDALE AVE	3		0393	94134	1
CA001000968	003	SUNNYDALE	030752	59 BLYTHDALE AVE	2		0394	94134	1
CA001000968	003	SUNNYDALE	030753	33 BLYTHDALE AVE	2		0388	94134	1
CA001000968	003	SUNNYDALE	030754	35 BLYTHDALE AVE	2		0388	94134	1
CA001000968	003	SUNNYDALE	030755	37 BLYTHDALE AVE	3		0388	94134	1
CA001000968	003	SUNNYDALE	030756	39 BLYTHDALE AVE	2		0388	94134	1
CA001000968	003	SUNNYDALE	030757	17 BLYTHDALE AVE	2		0389	94134	1
CA001000968	003	SUNNYDALE	030758	19 BLYTHDALE AVE	2		0389	94134	1
CA001000968	003	SUNNYDALE	030759	21 BLYTHDALE AVE	3		0389	94134	1
CA001000968	003	SUNNYDALE	030760	23 BLYTHDALE AVE	2		0389	94134	1
CA001000968	003	SUNNYDALE	030761	25 BLYTHDALE AVE	2		0389	94134	1
CA001000968	003	SUNNYDALE	030762	27 BLYTHDALE AVE	2		0389	94134	1
CA001000968	003	SUNNYDALE	030763	29 BLYTHDALE AVE	3		0389	94134	1
CA001000968	003	SUNNYDALE	030764	31 BLYTHDALE AVE	2		0389	94134	1
CA001000968	003	SUNNYDALE	030765	1 BLYTHDALE AVE	2		0390	94134	1
CA001000968	003	SUNNYDALE	030766	3 BLYTHDALE AVE	2		0390	94134	1
CA001000968	003	SUNNYDALE	030767	5 BLYTHDALE AVE	3		0390	94134	1
CA001000968	003	SUNNYDALE	030768	7 BLYTHDALE AVE	2		0390	94134	1
CA001000968	003	SUNNYDALE	030769	9 BLYTHDALE AVE	2		0390	94134	1
CA001000968	003	SUNNYDALE	030770	11 BLYTHDALE AVE	2		0390	94134	1
CA001000968	003	SUNNYDALE	030771	13 BLYTHDALE AVE	3		0390	94134	1
CA001000968	003	SUNNYDALE	030772	15 BLYTHDALE AVE	2		0390	94134	1
CA001000968	48	VELASCO	480801	602 VELASCO ST	0	A	4802	94134	1
CA001000968	48	VELASCO	480802	602 VELASCO ST	1	B	4802	94134	1
CA001000968	48	VELASCO	480803	606 VELASCO ST	2	A	4802	94134	1
CA001000968	48	VELASCO	480804	606 VELASCO ST	1	B	4802	94134	1
CA001000968	48	VELASCO	480805	612 VELASCO ST	0	A	4802	94134	1
CA001000968	48	VELASCO	480806	612 VELASCO ST	0	B	4802	94134	1
CA001000968	48	VELASCO	480807	616 VELASCO ST	2	A	4802	94134	1
CA001000968	48	VELASCO	480808	616 VELASCO ST	2	B	4802	94134	1

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address	Bdrm Size	Apt No.	Bldg No.	Zip Code	Count
CA001000968	48	VELASCO	480809	622 VELASCO ST	0	A	4802	94134	1
CA001000968	48	VELASCO	480810	622 VELASCO ST	0	B	4802	94134	1
CA001000968	48	VELASCO	480811	626 VELASCO ST	2	A	4802	94134	1
CA001000968	48	VELASCO	480812	626 VELASCO ST	2	B	4801	94134	1
CA001000968	48	VELASCO	480813	632 VELASCO ST	1	A	4801	94134	1
CA001000968	48	VELASCO	480814	632 VELASCO ST	1	B	4801	94134	1
CA001000968	48	VELASCO	480815	636 VELASCO ST	1	A	4801	94134	1
CA001000968	48	VELASCO	480816	636 VELASCO ST	1	B	4801	94134	1
CA001000968	48	VELASCO	480817	642 VELASCO ST	1	A	4801	94134	1
CA001000968	48	VELASCO	480818	642 VELASCO ST	1	B	4801	94134	1
TOTAL FOR AMP 968									775

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Unit No.	Development Name	Unit No.	Unit Address	Bdrm Size	Bldg No.	Zip Code	Count
CA001000970	007	070001	WESTBROOK APTS	070001	847 INNES AVE	4	0712	94124	1
CA001000970	007	070002	WESTBROOK APTS	070002	849 INNES AVE	3	0712	94124	1
CA001000970	007	070003	WESTBROOK APTS	070003	851 INNES AVE	2	0712	94124	1
CA001000970	007	070004	WESTBROOK APTS	070004	853 INNES AVE	2	0712	94124	1
CA001000970	007	070005	WESTBROOK APTS	070005	855 INNES AVE	2	0712	94124	1
CA001000970	007	070006	WESTBROOK APTS	070006	857 INNES AVE	3	0712	94124	1
CA001000970	007	070007	WESTBROOK APTS	070007	859 INNES AVE	3	0712	94124	1
CA001000970	007	070008	WESTBROOK APTS	070008	861 INNES AVE	4	0712	94124	1
CA001000970	007	070009	WESTBROOK APTS	070009	1 NORTHRIDGE RD	1	0714	94124	1
CA001000970	007	070010	WESTBROOK APTS	070010	3 NORTHRIDGE RD	3	0714	94124	1
CA001000970	007	070011	WESTBROOK APTS	070011	5 NORTHRIDGE RD	2	0714	94124	1
CA001000970	007	070012	WESTBROOK APTS	070012	7 NORTHRIDGE RD	2	0714	94124	1
CA001000970	007	070013	WESTBROOK APTS	070013	9 NORTHRIDGE RD	2	0714	94124	1
CA001000970	007	070014	WESTBROOK APTS	070014	11 NORTHRIDGE RD	3	0714	94124	1
CA001000970	007	070015	WESTBROOK APTS	070015	15 NORTHRIDGE RD	3	0714	94124	1
CA001000970	007	070016	WESTBROOK APTS	070016	17 NORTHRIDGE RD	1	0714	94124	1
CA001000970	007	070017	WESTBROOK APTS	070017	2 NORTHRIDGE RD	4	0713	94124	1
CA001000970	007	070018	WESTBROOK APTS	070018	4 NORTHRIDGE RD	3	0713	94124	1
CA001000970	007	070019	WESTBROOK APTS	070019	6 NORTHRIDGE RD	3	0713	94124	1
CA001000970	007	070020	WESTBROOK APTS	070020	8 NORTHRIDGE RD	2	0713	94124	1
CA001000970	007	070021	WESTBROOK APTS	070021	10 NORTHRIDGE RD	2	0713	94124	1
CA001000970	007	070022	WESTBROOK APTS	070022	12 NORTHRIDGE RD	2	0713	94124	1
CA001000970	007	070023	WESTBROOK APTS	070023	14 NORTHRIDGE RD	3	0713	94124	1
CA001000970	007	070024	WESTBROOK APTS	070024	16 NORTHRIDGE RD	4	0713	94124	1
CA001000970	007	070025	WESTBROOK APTS	070025	19 NORTHRIDGE RD	3	0716	94124	1
CA001000970	007	070026	WESTBROOK APTS	070026	21 NORTHRIDGE RD	3	0716	94124	1
CA001000970	007	070027	WESTBROOK APTS	070027	23 NORTHRIDGE RD	2	0716	94124	1
CA001000970	007	070028	WESTBROOK APTS	070028	25 NORTHRIDGE RD	2	0716	94124	1
CA001000970	007	070029	WESTBROOK APTS	070029	27 NORTHRIDGE RD	2	0716	94124	1
CA001000970	007	070030	WESTBROOK APTS	070030	29 NORTHRIDGE RD	3	0716	94124	1
CA001000970	007	070031	WESTBROOK APTS	070031	18 NORTHRIDGE RD	4	0711	94124	1
CA001000970	007	070032	WESTBROOK APTS	070032	20 NORTHRIDGE RD	3	0711	94124	1
CA001000970	007	070033	WESTBROOK APTS	070033	22 NORTHRIDGE RD	3	0711	94124	1
CA001000970	007	070034	WESTBROOK APTS	070034	24 NORTHRIDGE RD	3	0711	94124	1
CA001000970	007	070035	WESTBROOK APTS	070035	26 NORTHRIDGE RD	3	0711	94124	1
CA001000970	007	070036	WESTBROOK APTS	070036	28 NORTHRIDGE RD	4	0711	94124	1
CA001000970	007	070037	WESTBROOK APTS	070037	31 NORTHRIDGE RD	3	0717	94124	1
CA001000970	007	070038	WESTBROOK APTS	070038	33 NORTHRIDGE RD	3	0717	94124	1
CA001000970	007	070039	WESTBROOK APTS	070039	35 NORTHRIDGE RD	2	0717	94124	1
CA001000970	007	070040	WESTBROOK APTS	070040	37 NORTHRIDGE RD	2	0717	94124	1
CA001000970	007	070041	WESTBROOK APTS	070041	39 NORTHRIDGE RD	2	0717	94124	1
CA001000970	007	070042	WESTBROOK APTS	070042	41 NORTHRIDGE RD	3	0717	94124	1
CA001000970	007	070043	WESTBROOK APTS	070043	30 NORTHRIDGE RD	4	0710	94124	1
CA001000970	007	070044	WESTBROOK APTS	070044	32 NORTHRIDGE RD	3	0710	94124	1

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Unit No.	Development Name	Unit No.	Unit Address	Bdrm Size	Bldg No.	Zip Code	Count
CA001000970	007	070045	WESTBROOK APTS	070045	34 NORTHRIDGE RD	3	0710	94124	1
CA001000970	007	070046	WESTBROOK APTS	070046	36 NORTHRIDGE RD	3	0710	94124	1
CA001000970	007	070047	WESTBROOK APTS	070047	38 NORTHRIDGE RD	3	0710	94124	1
CA001000970	007	070048	WESTBROOK APTS	070048	40 NORTHRIDGE RD	4	0710	94124	1
CA001000970	007	070049	WESTBROOK APTS	070049	43 NORTHRIDGE RD	4	0719	94124	1
CA001000970	007	070050	WESTBROOK APTS	070050	45 NORTHRIDGE RD	3	0719	94124	1
CA001000970	007	070051	WESTBROOK APTS	070051	47 NORTHRIDGE RD	3	0719	94124	1
CA001000970	007	070052	WESTBROOK APTS	070052	49 NORTHRIDGE RD	3	0719	94124	1
CA001000970	007	070053	WESTBROOK APTS	070053	51 NORTHRIDGE RD	3	0719	94124	1
CA001000970	007	070054	WESTBROOK APTS	070054	53 NORTHRIDGE RD	4	0719	94124	1
CA001000970	007	070055	WESTBROOK APTS	070055	42 NORTHRIDGE RD	1	0709	94124	1
CA001000970	007	070056	WESTBROOK APTS	070056	44 NORTHRIDGE RD	3	0709	94124	1
CA001000970	007	070057	WESTBROOK APTS	070057	46 NORTHRIDGE RD	3	0709	94124	1
CA001000970	007	070058	WESTBROOK APTS	070058	48 NORTHRIDGE RD	2	0709	94124	1
CA001000970	007	070059	WESTBROOK APTS	070059	50 NORTHRIDGE RD	2	0709	94124	1
CA001000970	007	070060	WESTBROOK APTS	070060	52 NORTHRIDGE RD	2	0709	94124	1
CA001000970	007	070061	WESTBROOK APTS	070061	54 NORTHRIDGE RD	3	0709	94124	1
CA001000970	007	070062	WESTBROOK APTS	070062	56 NORTHRIDGE RD	1	0709	94124	1
CA001000970	007	070063	WESTBROOK APTS	070063	55 NORTHRIDGE RD	3	0721	94124	1
CA001000970	007	070064	WESTBROOK APTS	070064	57 NORTHRIDGE RD	3	0721	94124	1
CA001000970	007	070065	WESTBROOK APTS	070065	59 NORTHRIDGE RD	2	0721	94124	1
CA001000970	007	070066	WESTBROOK APTS	070066	61 NORTHRIDGE RD	2	0721	94124	1
CA001000970	007	070067	WESTBROOK APTS	070067	63 NORTHRIDGE RD	2	0721	94124	1
CA001000970	007	070068	WESTBROOK APTS	070068	65 NORTHRIDGE RD	3	0721	94124	1
CA001000970	007	070069	WESTBROOK APTS	070069	58 NORTHRIDGE RD	4	0708	94124	1
CA001000970	007	070070	WESTBROOK APTS	070070	60 NORTHRIDGE RD	3	0708	94124	1
CA001000970	007	070071	WESTBROOK APTS	070071	62 NORTHRIDGE RD	3	0708	94124	1
CA001000970	007	070072	WESTBROOK APTS	070072	64 NORTHRIDGE RD	3	0708	94124	1
CA001000970	007	070073	WESTBROOK APTS	070073	66 NORTHRIDGE RD	3	0708	94124	1
CA001000970	007	070074	WESTBROOK APTS	070074	68 NORTHRIDGE RD	4	0708	94124	1
CA001000970	007	070075	WESTBROOK APTS	070075	67 NORTHRIDGE RD	5	0723	94124	1
CA001000970	007	070076	WESTBROOK APTS	070076	69 NORTHRIDGE RD	3	0723	94124	1
CA001000970	007	070077	WESTBROOK APTS	070077	71 NORTHRIDGE RD	3	0723	94124	1
CA001000970	007	070078	WESTBROOK APTS	070078	73 NORTHRIDGE RD	5	0723	94124	1
CA001000970	007	070079	WESTBROOK APTS	070079	70 NORTHRIDGE RD	4	0707	94124	1
CA001000970	007	070080	WESTBROOK APTS	070080	72 NORTHRIDGE RD	3	0707	94124	1
CA001000970	007	070081	WESTBROOK APTS	070081	74 NORTHRIDGE RD	3	0707	94124	1
CA001000970	007	070082	WESTBROOK APTS	070082	76 NORTHRIDGE RD	3	0707	94124	1
CA001000970	007	070083	WESTBROOK APTS	070083	78 NORTHRIDGE RD	3	0707	94124	1
CA001000970	007	070084	WESTBROOK APTS	070084	80 NORTHRIDGE RD	4	0707	94124	1
CA001000970	007	070085	WESTBROOK APTS	070085	75 NORTHRIDGE RD	5	0725	94124	1
CA001000970	007	070086	WESTBROOK APTS	070086	77 NORTHRIDGE RD	3	0725	94124	1
CA001000970	007	070087	WESTBROOK APTS	070087	79 NORTHRIDGE RD	3	0725	94124	1
CA001000970	007	070088	WESTBROOK APTS	070088	81 NORTHRIDGE RD	5	0725	94124	1

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CA No.	Dev. No.	Unit No.	Development Name	Unit No.		Unit Address	Bdrm Size	Bldg No.	Zip Code	Count
CA001000970	007	070089	WESTBROOK APTS	070089	82	NORTHRIDGE RD	3	0706	94124	1
CA001000970	007	070090	WESTBROOK APTS	070090	84	NORTHRIDGE RD	3	0706	94124	1
CA001000970	007	070091	WESTBROOK APTS	070091	86	NORTHRIDGE RD	2	0706	94124	1
CA001000970	007	070092	WESTBROOK APTS	070092	88	NORTHRIDGE RD	2	0706	94124	1
CA001000970	007	070093	WESTBROOK APTS	070093	90	NORTHRIDGE RD	2	0706	94124	1
CA001000970	007	070094	WESTBROOK APTS	070094	92	NORTHRIDGE RD	3	0706	94124	1
CA001000970	007	070095	WESTBROOK APTS	070095	83	NORTHRIDGE RD	3	0726	94124	1
CA001000970	007	070096	WESTBROOK APTS	070096	85	NORTHRIDGE RD	3	0726	94124	1
CA001000970	007	070097	WESTBROOK APTS	070097	87	NORTHRIDGE RD	2	0726	94124	1
CA001000970	007	070098	WESTBROOK APTS	070098	89	NORTHRIDGE RD	2	0726	94124	1
CA001000970	007	070099	WESTBROOK APTS	070099	91	NORTHRIDGE RD	2	0726	94124	1
CA001000970	007	070100	WESTBROOK APTS	070100	93	NORTHRIDGE RD	3	0726	94124	1
CA001000970	007	070101	WESTBROOK APTS	070101	101	NORTHRIDGE RD	3	0729	94124	1
CA001000970	007	070102	WESTBROOK APTS	070102	103	NORTHRIDGE RD	3	0729	94124	1
CA001000970	007	070103	WESTBROOK APTS	070103	105	NORTHRIDGE RD	2	0729	94124	1
CA001000970	007	070104	WESTBROOK APTS	070104	107	NORTHRIDGE RD	2	0729	94124	1
CA001000970	007	070105	WESTBROOK APTS	070105	109	NORTHRIDGE RD	2	0729	94124	1
CA001000970	007	070106	WESTBROOK APTS	070106	111	NORTHRIDGE RD	3	0729	94124	1
CA001000970	007	070107	WESTBROOK APTS	070107	113	NORTHRIDGE RD	5	0730	94124	1
CA001000970	007	070108	WESTBROOK APTS	070108	115	NORTHRIDGE RD	3	0730	94124	1
CA001000970	007	070109	WESTBROOK APTS	070109	117	NORTHRIDGE RD	3	0730	94124	1
CA001000970	007	070110	WESTBROOK APTS	070110	119	NORTHRIDGE RD	5	0730	94124	1
CA001000970	007	070111	WESTBROOK APTS	070111	121	NORTHRIDGE RD	3	0733	94124	1
CA001000970	007	070112	WESTBROOK APTS	070112	123	NORTHRIDGE RD	3	0733	94124	1
CA001000970	007	070113	WESTBROOK APTS	070113	125	NORTHRIDGE RD	2	0733	94124	1
CA001000970	007	070114	WESTBROOK APTS	070114	127	NORTHRIDGE RD	2	0733	94124	1
CA001000970	007	070115	WESTBROOK APTS	070115	129	NORTHRIDGE RD	2	0733	94124	1
CA001000970	007	070116	WESTBROOK APTS	070116	131	NORTHRIDGE RD	3	0733	94124	1
CA001000970	007	070117	WESTBROOK APTS	070117	120	NORTHRIDGE RD	4	0735	94124	1
CA001000970	007	070118	WESTBROOK APTS	070118	122	NORTHRIDGE RD	3	0735	94124	1
CA001000970	007	070119	WESTBROOK APTS	070119	124	NORTHRIDGE RD	2	0735	94124	1
CA001000970	007	070120	WESTBROOK APTS	070120	126	NORTHRIDGE RD	2	0735	94124	1
CA001000970	007	070121	WESTBROOK APTS	070121	128	NORTHRIDGE RD	2	0735	94124	1
CA001000970	007	070122	WESTBROOK APTS	070122	130	NORTHRIDGE RD	3	0735	94124	1
CA001000970	007	070123	WESTBROOK APTS	070123	132	NORTHRIDGE RD	3	0735	94124	1
CA001000970	007	070124	WESTBROOK APTS	070124	134	NORTHRIDGE RD	4	0735	94124	1
CA001000970	007	070125	WESTBROOK APTS	070125	133	NORTHRIDGE RD	3	0734	94124	1
CA001000970	007	070126	WESTBROOK APTS	070126	135	NORTHRIDGE RD	3	0734	94124	1
CA001000970	007	070127	WESTBROOK APTS	070127	137	NORTHRIDGE RD	2	0734	94124	1
CA001000970	007	070128	WESTBROOK APTS	070128	139	NORTHRIDGE RD	2	0734	94124	1
CA001000970	007	070129	WESTBROOK APTS	070129	141	NORTHRIDGE RD	2	0734	94124	1
CA001000970	007	070130	WESTBROOK APTS	070130	143	NORTHRIDGE RD	3	0734	94124	1
CA001000970	007	070131	WESTBROOK APTS	070131	1	HARBOR RD	4	0737	94124	1
CA001000970	007	070132	WESTBROOK APTS	070132	3	HARBOR RD	3	0737	94124	1

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CA No.	Dev. No.	Unit No.	Development Name	Unit No.	Unit Address		Bdrm Size	Bldg No.	Zip Code	Count
CA001000970	007	070133	WESTBROOK APTS	070133	5	HARBOR RD	2	0737	94124	1
CA001000970	007	070134	WESTBROOK APTS	070134	7	HARBOR RD	2	0737	94124	1
CA001000970	007	070135	WESTBROOK APTS	070135	9	HARBOR RD	2	0737	94124	1
CA001000970	007	070136	WESTBROOK APTS	070136	11	HARBOR RD	3	0737	94124	1
CA001000970	007	070137	WESTBROOK APTS	070137	15	HARBOR RD	3	0737	94124	1
CA001000970	007	070138	WESTBROOK APTS	070138	17	HARBOR RD	4	0737	94124	1
CA001000970	007	070139	WESTBROOK APTS	070139	2	HARBOR RD	4	0705	94124	1
CA001000970	007	070140	WESTBROOK APTS	070140	4	HARBOR RD	3	0705	94124	1
CA001000970	007	070141	WESTBROOK APTS	070141	6	HARBOR RD	3	0705	94124	1
CA001000970	007	070142	WESTBROOK APTS	070142	8	HARBOR RD	3	0705	94124	1
CA001000970	007	070143	WESTBROOK APTS	070143	10	HARBOR RD	3	0705	94124	1
CA001000970	007	070144	WESTBROOK APTS	070144	12	HARBOR RD	4	0705	94124	1
CA001000970	007	070145	WESTBROOK APTS	070145	19	HARBOR RD	4	0736	94124	1
CA001000970	007	070146	WESTBROOK APTS	070146	21	HARBOR RD	3	0736	94124	1
CA001000970	007	070147	WESTBROOK APTS	070147	23	HARBOR RD	2	0736	94124	1
CA001000970	007	070148	WESTBROOK APTS	070148	25	HARBOR RD	2	0736	94124	1
CA001000970	007	070149	WESTBROOK APTS	070149	27	HARBOR RD	2	0736	94124	1
CA001000970	007	070150	WESTBROOK APTS	070150	29	HARBOR RD	3	0736	94124	1
CA001000970	007	070151	WESTBROOK APTS	070151	31	HARBOR RD	3	0736	94124	1
CA001000970	007	070152	WESTBROOK APTS	070152	33	HARBOR RD	4	0736	94124	1
CA001000970	007	070153	WESTBROOK APTS	070153	14	HARBOR RD	4	0704	94124	1
CA001000970	007	070154	WESTBROOK APTS	070154	16	HARBOR RD	3	0704	94124	1
CA001000970	007	070155	WESTBROOK APTS	070155	18	HARBOR RD	3	0704	94124	1
CA001000970	007	070156	WESTBROOK APTS	070156	20	HARBOR RD	3	0704	94124	1
CA001000970	007	070157	WESTBROOK APTS	070157	22	HARBOR RD	3	0704	94124	1
CA001000970	007	070158	WESTBROOK APTS	070158	24	HARBOR RD	4	0704	94124	1
CA001000970	007	070159	WESTBROOK APTS	070159	26	HARBOR RD	4	0703	94124	1
CA001000970	007	070160	WESTBROOK APTS	070160	28	HARBOR RD	3	0703	94124	1
CA001000970	007	070161	WESTBROOK APTS	070161	30	HARBOR RD	3	0703	94124	1
CA001000970	007	070162	WESTBROOK APTS	070162	32	HARBOR RD	2	0703	94124	1
CA001000970	007	070163	WESTBROOK APTS	070163	34	HARBOR RD	2	0703	94124	1
CA001000970	007	070164	WESTBROOK APTS	070164	36	HARBOR RD	2	0703	94124	1
CA001000970	007	070165	WESTBROOK APTS	070165	38	HARBOR RD	3	0703	94124	1
CA001000970	007	070166	WESTBROOK APTS	070166	40	HARBOR RD	4	0703	94124	1
CA001000970	007	070167	WESTBROOK APTS	070167	42	HARBOR RD	4	0702	94124	1
CA001000970	007	070168	WESTBROOK APTS	070168	44	HARBOR RD	3	0702	94124	1
CA001000970	007	070169	WESTBROOK APTS	070169	46	HARBOR RD	3	0702	94124	1
CA001000970	007	070170	WESTBROOK APTS	070170	48	HARBOR RD	3	0702	94124	1
CA001000970	007	070171	WESTBROOK APTS	070171	50	HARBOR RD	3	0702	94124	1
CA001000970	007	070172	WESTBROOK APTS	070172	52	HARBOR RD	4	0702	94124	1
CA001000970	007	070173	WESTBROOK APTS	070173	54	HARBOR RD	4	0701	94124	1
CA001000970	007	070174	WESTBROOK APTS	070174	56	HARBOR RD	3	0701	94124	1
CA001000970	007	070175	WESTBROOK APTS	070175	58	HARBOR RD	3	0701	94124	1
CA001000970	007	070176	WESTBROOK APTS	070176	60	HARBOR RD	3	0701	94124	1

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CA No.	Dev. No.	Unit No.	Development Name	Unit No.	Unit Address		Bdrm Size	Bldg No.	Zip Code	Count
CA001000970	007	070177	WESTBROOK APTS	070177	62	HARBOR RD	3	0701	94124	1
CA001000970	007	070178	WESTBROOK APTS	070178	64	HARBOR RD	4	0701	94124	1
CA001000970	007	070179	WESTBROOK APTS	070179	100	KISKA RD	3	0732	94124	1
CA001000970	007	070180	WESTBROOK APTS	070180	102	KISKA RD	2	0732	94124	1
CA001000970	007	070181	WESTBROOK APTS	070181	104	KISKA RD	2	0732	94124	1
CA001000970	007	070182	WESTBROOK APTS	070182	106	KISKA RD	2	0732	94124	1
CA001000970	007	070183	WESTBROOK APTS	070183	108	KISKA RD	3	0732	94124	1
CA001000970	007	070184	WESTBROOK APTS	070184	110	KISKA RD	3	0732	94124	1
CA001000970	007	070185	WESTBROOK APTS	070185	112	KISKA RD	5	0731	94124	1
CA001000970	007	070186	WESTBROOK APTS	070186	114	KISKA RD	3	0731	94124	1
CA001000970	007	070187	WESTBROOK APTS	070187	116	KISKA RD	3	0731	94124	1
CA001000970	007	070188	WESTBROOK APTS	070188	118	KISKA RD	5	0731	94124	1
CA001000970	007	070189	WESTBROOK APTS	070189	120	KISKA RD	3	0728	94124	1
CA001000970	007	070190	WESTBROOK APTS	070190	122	KISKA RD	2	0728	94124	1
CA001000970	007	070191	WESTBROOK APTS	070191	124	KISKA RD	2	0728	94124	1
CA001000970	007	070192	WESTBROOK APTS	070192	126	KISKA RD	2	0728	94124	1
CA001000970	007	070193	WESTBROOK APTS	070193	128	KISKA RD	3	0728	94124	1
CA001000970	007	070194	WESTBROOK APTS	070194	130	KISKA RD	3	0728	94124	1
CA001000970	007	070195	WESTBROOK APTS	070195	132	KISKA RD	5	0727	94124	1
CA001000970	007	070196	WESTBROOK APTS	070196	134	KISKA RD	3	0727	94124	1
CA001000970	007	070197	WESTBROOK APTS	070197	136	KISKA RD	3	0727	94124	1
CA001000970	007	070198	WESTBROOK APTS	070198	138	KISKA RD	5	0727	94124	1
CA001000970	007	070199	WESTBROOK APTS	070199	140	KISKA RD	3	0724	94124	1
CA001000970	007	070200	WESTBROOK APTS	070200	142	KISKA RD	2	0724	94124	1
CA001000970	007	070201	WESTBROOK APTS	070201	144	KISKA RD	2	0724	94124	1
CA001000970	007	070202	WESTBROOK APTS	070202	146	KISKA RD	2	0724	94124	1
CA001000970	007	070203	WESTBROOK APTS	070203	148	KISKA RD	3	0724	94124	1
CA001000970	007	070204	WESTBROOK APTS	070204	150	KISKA RD	3	0724	94124	1
CA001000970	007	070205	WESTBROOK APTS	070205	152	KISKA RD	5	0722	94124	1
CA001000970	007	070206	WESTBROOK APTS	070206	154	KISKA RD	3	0722	94124	1
CA001000970	007	070207	WESTBROOK APTS	070207	156	KISKA RD	3	0722	94124	1
CA001000970	007	070208	WESTBROOK APTS	070208	158	KISKA RD	5	0722	94124	1
CA001000970	007	070209	WESTBROOK APTS	070209	160	KISKA RD	3	0720	94124	1
CA001000970	007	070210	WESTBROOK APTS	070210	162	KISKA RD	2	0720	94124	1
CA001000970	007	070211	WESTBROOK APTS	070211	164	KISKA RD	2	0720	94124	1
CA001000970	007	070212	WESTBROOK APTS	070212	166	KISKA RD	2	0720	94124	1
CA001000970	007	070213	WESTBROOK APTS	070213	168	KISKA RD	3	0720	94124	1
CA001000970	007	070214	WESTBROOK APTS	070214	170	KISKA RD	3	0720	94124	1
CA001000970	007	070215	WESTBROOK APTS	070215	172	KISKA RD	4	0718	94124	1
CA001000970	007	070216	WESTBROOK APTS	070216	174	KISKA RD	3	0718	94124	1
CA001000970	007	070217	WESTBROOK APTS	070217	176	KISKA RD	3	0718	94124	1
CA001000970	007	070218	WESTBROOK APTS	070218	178	KISKA RD	3	0718	94124	1
CA001000970	007	070219	WESTBROOK APTS	070219	180	KISKA RD	3	0718	94124	1
CA001000970	007	070220	WESTBROOK APTS	070220	182	KISKA RD	4	0718	94124	1

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CA No.	Dev. No.	Unit No.	Development Name	Unit No.	Unit Address	Bdrm Size	Bldg No.	Zip Code	Count
CA001000970	007	070221	WESTBROOK APTS	070221	184 KISKA RD	4	0715	94124	1
CA001000970	007	070222	WESTBROOK APTS	070222	186 KISKA RD	3	0715	94124	1
CA001000970	007	070223	WESTBROOK APTS	070223	188 KISKA RD	3	0715	94124	1
CA001000970	007	070224	WESTBROOK APTS	070224	190 KISKA RD	3	0715	94124	1
CA001000970	007	070225	WESTBROOK APTS	070225	192 KISKA RD	3	0715	94124	1
CA001000970	007	070226	WESTBROOK APTS	070226	194 KISKA RD	4	0715	94124	1
TOTAL FOR AMP 970									226

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address	Bdrm Size	Apt. No.	Bldg No.	Zip Code	Count
CA001000973	012	HUNTERS POINT A WEST	120025	740 JERROLD AVE	4		1203	94124	1
CA001000973	012	HUNTERS POINT A WEST	120026	744 JERROLD AVE	4		1203	94124	1
CA001000973	012	HUNTERS POINT A WEST	120027	748 JERROLD AVE	4		1203	94124	1
CA001000973	012	HUNTERS POINT A WEST	120028	752 JERROLD AVE	4		1203	94124	1
CA001000973	012	HUNTERS POINT A WEST	120029	768 JERROLD AVE	4		1202	94124	1
CA001000973	012	HUNTERS POINT A WEST	120030	772 JERROLD AVE	4		1202	94124	1
CA001000973	012	HUNTERS POINT A WEST	120033	770 JERROLD AVE	2	E	1202	94124	1
CA001000973	012	HUNTERS POINT A WEST	120034	770 JERROLD AVE	2	F	1202	94124	1
CA001000973	012	HUNTERS POINT A WEST	120035	770 JERROLD AVE	2	G	1202	94124	1
CA001000973	012	HUNTERS POINT A WEST	120036	770 JERROLD AVE	2	H	1202	94124	1
CA001000973	012	HUNTERS POINT A WEST	120037	770 JERROLD AVE	2	I	1202	94124	1
CA001000973	012	HUNTERS POINT A WEST	120038	770 JERROLD AVE	2	J	1202	94124	1
CA001000973	012	HUNTERS POINT A WEST	120039	770 JERROLD AVE	2	K	1202	94124	1
CA001000973	012	HUNTERS POINT A WEST	120040	770 JERROLD AVE	2	L	1202	94124	1
CA001000973	012	HUNTERS POINT A WEST	120041	786 JERROLD AVE	4		1201	94124	1
CA001000973	012	HUNTERS POINT A WEST	120042	790 JERROLD AVE	4		1201	94124	1
CA001000973	012	HUNTERS POINT A WEST	120043	794 JERROLD AVE	4		1201	94124	1
CA001000973	012	HUNTERS POINT A WEST	120044	798 JERROLD AVE	4		1201	94124	1
CA001000973	012	HUNTERS POINT A WEST	120058	761 JERROLD AVE	3		1204	94124	1
CA001000973	012	HUNTERS POINT A WEST	120059	759 JERROLD AVE	3		1204	94124	1
CA001000973	012	HUNTERS POINT A WEST	120060	755 JERROLD AVE	3		1204	94124	1
CA001000973	012	HUNTERS POINT A WEST	120061	753 JERROLD AVE	3		1204	94124	1
CA001000973	012	HUNTERS POINT A WEST	120062	749 JERROLD AVE	3		1204	94124	1
CA001000973	012	HUNTERS POINT A WEST	120063	747 JERROLD AVE	4		1203	94124	1
CA001000973	012	HUNTERS POINT A WEST	120066	737 JERROLD AVE	3		1205	94124	1
CA001000973	012	HUNTERS POINT A WEST	120067	735 JERROLD AVE	3		1205	94124	1
CA001000973	012	HUNTERS POINT A WEST	120068	731 JERROLD AVE	3		1205	94124	1
CA001000973	012	HUNTERS POINT A WEST	120069	729 JERROLD AVE	3		1205	94124	1
CA001000973	012	HUNTERS POINT A WEST	120070	725 JERROLD AVE	3		1205	94124	1
CA001000973	012	HUNTERS POINT A WEST	120071	723 JERROLD AVE	2		1206	94124	1
CA001000973	012	HUNTERS POINT A WEST	120072	721 JERROLD AVE	2		1206	94124	1
CA001000973	012	HUNTERS POINT A WEST	120073	719 JERROLD AVE	2		1206	94124	1
CA001000973	012	HUNTERS POINT A WEST	120074	717 JERROLD AVE	2		1206	94124	1
CA001000973	012	HUNTERS POINT A WEST	120075	715 JERROLD AVE	2		1206	94124	1
CA001000973	012	HUNTERS POINT A WEST	120076	711 JERROLD AVE	2		1206	94124	1
CA001000973	012	HUNTERS POINT A WEST	120077	709 JERROLD AVE	2		1206	94124	1
CA001000973	012	HUNTERS POINT A WEST	120078	707 JERROLD AVE	2		1206	94124	1
CA001000973	012	HUNTERS POINT A WEST	120079	716 KIRKWOOD AVE	2		1207	94124	1
CA001000973	012	HUNTERS POINT A WEST	120080	718 KIRKWOOD AVE	2		1207	94124	1
CA001000973	012	HUNTERS POINT A WEST	120081	720 KIRKWOOD AVE	4		1207	94124	1
CA001000973	012	HUNTERS POINT A WEST	120082	724 KIRKWOOD AVE	4		1207	94124	1
CA001000973	012	HUNTERS POINT A WEST	120083	726 KIRKWOOD AVE	4		1207	94124	1
CA001000973	012	HUNTERS POINT A WEST	120084	730 KIRKWOOD AVE	4		1207	94124	1
CA001000973	012	HUNTERS POINT A WEST	120085	734 KIRKWOOD AVE	2		1208	94124	1
CA001000973	012	HUNTERS POINT A WEST	120086	738 KIRKWOOD AVE	2		1208	94124	1
CA001000973	012	HUNTERS POINT A WEST	120087	742 KIRKWOOD AVE	4		1208	94124	1
CA001000973	012	HUNTERS POINT A WEST	120088	752 KIRKWOOD AVE	4		1208	94124	1

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address	Bdrm Size	Apt. No.	Bldg No.	Zip Code	Count
CA001000973	012	HUNTERS POINT A WEST	120091	750 KIRKWOOD AVE	2	E	1208	94124	1
CA001000973	012	HUNTERS POINT A WEST	120092	750 KIRKWOOD AVE	2	F	1208	94124	1
CA001000973	012	HUNTERS POINT A WEST	120093	750 KIRKWOOD AVE	2	G	1208	94124	1
CA001000973	012	HUNTERS POINT A WEST	120094	750 KIRKWOOD AVE	2	H	1208	94124	1
CA001000973	012	HUNTERS POINT A WEST	120095	750 KIRKWOOD AVE	2	I	1208	94124	1
CA001000973	012	HUNTERS POINT A WEST	120096	750 KIRKWOOD AVE	2	J	1208	94124	1
CA001000973	012	HUNTERS POINT A WEST	120097	750 KIRKWOOD AVE	2	K	1208	94124	1
CA001000973	012	HUNTERS POINT A WEST	120098	750 KIRKWOOD AVE	2	L	1208	94124	1
CA001000973	012	HUNTERS POINT A WEST	120099	766 KIRKWOOD AVE	2		1209	94124	1
CA001000973	012	HUNTERS POINT A WEST	120100	770 KIRKWOOD AVE	2		1209	94124	1
CA001000973	012	HUNTERS POINT A WEST	120101	778 KIRKWOOD AVE	4		1209	94124	1
CA001000973	012	HUNTERS POINT A WEST	120102	782 KIRKWOOD AVE	4		1209	94124	1
CA001000973	012	HUNTERS POINT A WEST	120105	780 KIRKWOOD AVE	2	E	1209	94124	1
CA001000973	012	HUNTERS POINT A WEST	120106	780 KIRKWOOD AVE	2	F	1209	94124	1
CA001000973	012	HUNTERS POINT A WEST	120107	780 KIRKWOOD AVE	2	G	1209	94124	1
CA001000973	012	HUNTERS POINT A WEST	120108	780 KIRKWOOD AVE	2	H	1209	94124	1
CA001000973	012	HUNTERS POINT A WEST	120109	780 KIRKWOOD AVE	2	I	1209	94124	1
CA001000973	012	HUNTERS POINT A WEST	120110	780 KIRKWOOD AVE	2	J	1209	94124	1
CA001000973	012	HUNTERS POINT A WEST	120111	780 KIRKWOOD AVE	2	K	1209	94124	1
CA001000973	012	HUNTERS POINT A WEST	120112	780 KIRKWOOD AVE	2	L	1209	94124	1
CA001000973	012	HUNTERS POINT A WEST	120113	784 KIRKWOOD AVE	2		1210	94124	1
CA001000973	012	HUNTERS POINT A WEST	120114	786 KIRKWOOD AVE	2		1210	94124	1
CA001000973	012	HUNTERS POINT A WEST	120115	788 KIRKWOOD AVE	3		1210	94124	1
CA001000973	012	HUNTERS POINT A WEST	120116	792 KIRKWOOD AVE	3		1210	94124	1
CA001000973	012	HUNTERS POINT A WEST	120119	790 KIRKWOOD AVE	2	E	1210	94124	1
CA001000973	012	HUNTERS POINT A WEST	120120	790 KIRKWOOD AVE	1	F	1210	94124	1
CA001000973	012	HUNTERS POINT A WEST	120121	790 KIRKWOOD AVE	1	G	1210	94124	1
CA001000973	012	HUNTERS POINT A WEST	120122	790 KIRKWOOD AVE	2	H	1210	94124	1
CA001000973	012	HUNTERS POINT A WEST	120123	790 KIRKWOOD AVE	2	I	1210	94124	1
CA001000973	012	HUNTERS POINT A WEST	120124	790 KIRKWOOD AVE	1	J	1210	94124	1
CA001000973	012	HUNTERS POINT A WEST	120125	790 KIRKWOOD AVE	1	K	1210	94124	1
CA001000973	012	HUNTERS POINT A WEST	120126	790 KIRKWOOD AVE	2	L	1210	94124	1
CA001000973	012	HUNTERS POINT A WEST	120127	1000 GRIFFITH ST	2		1211	94124	1
CA001000973	012	HUNTERS POINT A WEST	120128	1002 GRIFFITH ST	2		1211	94124	1
CA001000973	012	HUNTERS POINT A WEST	120129	1004 GRIFFITH ST	2		1211	94124	1
CA001000973	012	HUNTERS POINT A WEST	120130	1006 GRIFFITH ST	2		1211	94124	1
CA001000973	012	HUNTERS POINT A WEST	120131	1008 GRIFFITH ST	2		1211	94124	1
CA001000973	012	HUNTERS POINT A WEST	120132	1010 GRIFFITH ST	2		1211	94124	1
CA001000973	012	HUNTERS POINT A WEST	120133	1014 GRIFFITH ST	3		1212	94124	1
CA001000973	012	HUNTERS POINT A WEST	120134	1016 GRIFFITH ST	3		1212	94124	1
CA001000973	012	HUNTERS POINT A WEST	120135	1018 GRIFFITH ST	3		1212	94124	1
CA001000973	012	HUNTERS POINT A WEST	120136	1020 GRIFFITH ST	3		1212	94124	1
CA001000973	012	HUNTERS POINT A WEST	120137	1022 GRIFFITH ST	3		1212	94124	1
CA001000973	012	HUNTERS POINT A WEST	120138	1024 GRIFFITH ST	3		1212	94124	1
CA001000973	012	HUNTERS POINT A WEST	120151	1030 GRIFFITH ST	2		1213	94124	1
CA001000973	012	HUNTERS POINT A WEST	120152	1032 GRIFFITH ST	2		1213	94124	1
CA001000973	012	HUNTERS POINT A WEST	120153	1034 GRIFFITH ST	2		1213	94124	1

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address	Bdrm Size	Apt. No.	Bldg No.	Zip Code	Count
CA001000973	012	HUNTERS POINT A WEST	120154	1036 GRIFFITH ST	2		1213	94124	1
CA001000973	012	HUNTERS POINT A WEST	120155	1038 GRIFFITH ST	2		1213	94124	1
CA001000973	012	HUNTERS POINT A WEST	120156	1040 GRIFFITH ST	2		1213	94124	1
CA001000973	012	HUNTERS POINT A WEST	120157	1042 GRIFFITH ST	2		1213	94124	1
CA001000973	012	HUNTERS POINT A WEST	120158	1044 GRIFFITH ST	2		1213	94124	1
CA001000973	012	HUNTERS POINT A WEST	120159	1046 GRIFFITH ST	2		1214	94124	1
CA001000973	012	HUNTERS POINT A WEST	120160	1048 GRIFFITH ST	2		1214	94124	1
CA001000973	012	HUNTERS POINT A WEST	120161	1050 GRIFFITH ST	2		1214	94124	1
CA001000973	012	HUNTERS POINT A WEST	120162	1052 GRIFFITH ST	2		1214	94124	1
CA001000973	012	HUNTERS POINT A WEST	120163	1054 GRIFFITH ST	2		1214	94124	1
CA001000973	012	HUNTERS POINT A WEST	120164	1056 GRIFFITH ST	2		1214	94124	1
CA001000973	012	HUNTERS POINT A WEST	120165	1060 GRIFFITH ST	4		1214	94124	1
CA001000973	012	HUNTERS POINT A WEST	120166	1062 GRIFFITH ST	4		1214	94124	1
CA001000973	012	HUNTERS POINT A WEST	120167	1064 GRIFFITH ST	4		1214	94124	1
CA001000973	012	HUNTERS POINT A WEST	120168	1066 GRIFFITH ST	4		1214	94124	1
CA001000973	012	HUNTERS POINT A WEST	120169	1013 OAKDALE AVE	4		1216	94124	1
CA001000973	012	HUNTERS POINT A WEST	120170	1015 OAKDALE AVE	2	E	1216	94124	1
CA001000973	012	HUNTERS POINT A WEST	120171	1015 OAKDALE AVE	1	F	1216	94124	1
CA001000973	012	HUNTERS POINT A WEST	120172	1015 OAKDALE AVE	1	G	1216	94124	1
CA001000973	012	HUNTERS POINT A WEST	120173	1015 OAKDALE AVE	2	H	1216	94124	1
CA001000973	012	HUNTERS POINT A WEST	120174	1015 OAKDALE AVE	2	I	1216	94124	1
CA001000973	012	HUNTERS POINT A WEST	120175	1015 OAKDALE AVE	1	J	1216	94124	1
CA001000973	012	HUNTERS POINT A WEST	120176	1015 OAKDALE AVE	1	K	1216	94124	1
CA001000973	012	HUNTERS POINT A WEST	120177	1015 OAKDALE AVE	2	L	1216	94124	1
CA001000973	012	HUNTERS POINT A WEST	120178	1017 OAKDALE AVE	4		1216	94124	1
CA001000973	012	HUNTERS POINT A WEST	120181	1021 OAKDALE AVE	2		1216	94124	1
CA001000973	012	HUNTERS POINT A WEST	120182	1025 OAKDALE AVE	2		1216	94124	1
CA001000973	012	HUNTERS POINT A WEST	120183	1029 OAKDALE AVE	2		1216	94124	1
CA001000973	012	HUNTERS POINT A WEST	120184	1033 OAKDALE AVE	2		1216	94124	1
CA001000973	012	HUNTERS POINT A WEST	120198	1071 OAKDALE AVE	2		1217	94124	1
CA001000973	012	HUNTERS POINT A WEST	120199	1073 OAKDALE AVE	1		1217	94124	1
CA001000973	012	HUNTERS POINT A WEST	120200	1075 OAKDALE AVE	2	E	1217	94124	1
CA001000973	012	HUNTERS POINT A WEST	120201	1075 OAKDALE AVE	2	F	1217	94124	1
CA001000973	012	HUNTERS POINT A WEST	120202	1075 OAKDALE AVE	2	G	1217	94124	1
CA001000973	012	HUNTERS POINT A WEST	120203	1075 OAKDALE AVE	2	H	1217	94124	1
CA001000973	012	HUNTERS POINT A WEST	120204	1077 OAKDALE AVE	5		1217	94124	1
CA001000973	012	HUNTERS POINT A WEST	120211	1087 OAKDALE AVE	6		1217	94124	1
CA001000973	012	HUNTERS POINT A WEST	120213	1089 OAKDALE AVE	3		1218	94124	1
CA001000973	012	HUNTERS POINT A WEST	120214	1093 OAKDALE AVE	3		1218	94124	1
CA001000973	012	HUNTERS POINT A WEST	120215	1095 OAKDALE AVE	3		1218	94124	1
CA001000973	012	HUNTERS POINT A WEST	120216	1099 OAKDALE AVE	3		1218	94124	1
CA001000973	012	HUNTERS POINT A WEST	120217	1101 OAKDALE AVE	3		1219	94124	1
CA001000973	012	HUNTERS POINT A WEST	120218	1105 OAKDALE AVE	3		1219	94124	1
CA001000973	012	HUNTERS POINT A WEST	120219	1107 OAKDALE AVE	3		1219	94124	1
CA001000973	012	HUNTERS POINT A WEST	120220	1111 OAKDALE AVE	3		1219	94124	1
CA001000973	012	HUNTERS POINT A WEST	120221	1115 OAKDALE AVE	3		1219	94124	1
CA001000973	012	HUNTERS POINT A WEST	120222	1125 OAKDALE AVE	3		1219	94124	1

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address	Bdrm Size	Apt. No.	Bldg No.	Zip Code	Count
CA001000973	012	HUNTERS POINT A WEST	120223	1135 OAKDALE AVE	2		1219	94124	1
CA001000973	012	HUNTERS POINT A WEST	120224	1137 OAKDALE AVE	2		1223	94124	1
CA001000973	012	HUNTERS POINT A WEST	120225	1114 PALOU AVE	3		1223	94124	1
CA001000973	012	HUNTERS POINT A WEST	120226	1116 PALOU AVE	3		1223	94124	1
CA001000973	012	HUNTERS POINT A WEST	120227	1118 PALOU AVE	3		1223	94124	1
CA001000973	012	HUNTERS POINT A WEST	120228	1120 PALOU AVE	3		1223	94124	1
CA001000973	012	HUNTERS POINT A WEST	120229	1122 PALOU AVE	3		1223	94124	1
CA001000973	012	HUNTERS POINT A WEST	120230	1124 PALOU AVE	3		1223	94124	1
CA001000973	012	HUNTERS POINT A WEST	120231	1126 PALOU AVE	2		1223	94124	1
CA001000973	012	HUNTERS POINT A WEST	120232	1128 PALOU AVE	2		1223	94124	1
CA001000973	012	HUNTERS POINT A WEST	120233	1163 OAKDALE AVE	4		1223	94124	1
CA001000973	012	HUNTERS POINT A WEST	120234	1165 OAKDALE AVE	2	E	1220	94124	1
CA001000973	012	HUNTERS POINT A WEST	120235	1165 OAKDALE AVE	1	F	1220	94124	1
CA001000973	012	HUNTERS POINT A WEST	120236	1165 OAKDALE AVE	1	G	1220	94124	1
CA001000973	012	HUNTERS POINT A WEST	120237	1165 OAKDALE AVE	2	H	1220	94124	1
CA001000973	012	HUNTERS POINT A WEST	120238	1165 OAKDALE AVE	2	I	1220	94124	1
CA001000973	012	HUNTERS POINT A WEST	120239	1165 OAKDALE AVE	1	J	1220	94124	1
CA001000973	012	HUNTERS POINT A WEST	120240	1165 OAKDALE AVE	1	K	1220	94124	1
CA001000973	012	HUNTERS POINT A WEST	120241	1165 OAKDALE AVE	2	L	1220	94124	1
CA001000973	012	HUNTERS POINT A WEST	120242	1167 OAKDALE AVE	4		1220	94124	1
CA001000973	012	HUNTERS POINT A WEST	120245	1169 OAKDALE AVE	2		1220	94124	1
CA001000973	012	HUNTERS POINT A WEST	120246	1171 OAKDALE AVE	2		1220	94124	1
CA001000973	012	HUNTERS POINT A WEST	120247	1175 OAKDALE AVE	2		1221	94124	1
CA001000973	012	HUNTERS POINT A WEST	120248	1177 OAKDALE AVE	2		1221	94124	1
CA001000973	012	HUNTERS POINT A WEST	120249	1183 OAKDALE AVE	5		1221	94124	1
CA001000973	012	HUNTERS POINT A WEST	120250	1185 OAKDALE AVE	2	E	1221	94124	1
CA001000973	012	HUNTERS POINT A WEST	120251	1185 OAKDALE AVE	2	F	1221	94124	1
CA001000973	012	HUNTERS POINT A WEST	120252	1185 OAKDALE AVE	2	G	1221	94124	1
CA001000973	012	HUNTERS POINT A WEST	120253	1185 OAKDALE AVE	2	H	1221	94124	1
CA001000973	012	HUNTERS POINT A WEST	120254	1187 OAKDALE AVE	5		1221	94124	1
CA001000973	012	HUNTERS POINT A WEST	120273	1040 PALOU AVE	2		1221	94124	1
CA001000973	012	HUNTERS POINT A WEST	120274	1044 PALOU AVE	2		1227	94124	1
CA001000973	012	HUNTERS POINT A WEST	120275	1046 PALOU AVE	2		1227	94124	1
CA001000973	012	HUNTERS POINT A WEST	120276	1050 PALOU AVE	2		1227	94124	1
CA001000973	012	HUNTERS POINT A WEST	120277	1056 PALOU AVE	2		1227	94124	1
CA001000973	012	HUNTERS POINT A WEST	120278	1060 PALOU AVE	2		1227	94124	1
CA001000973	012	HUNTERS POINT A WEST	120279	1064 PALOU AVE	4		1226	94124	1
CA001000973	012	HUNTERS POINT A WEST	120280	1066 PALOU AVE	2	E	1206	94124	1
CA001000973	012	HUNTERS POINT A WEST	120281	1066 PALOU AVE	1	F	1206	94124	1
CA001000973	012	HUNTERS POINT A WEST	120282	1066 PALOU AVE	1	G	1206	94124	1
CA001000973	012	HUNTERS POINT A WEST	120283	1066 PALOU AVE	2	H	1206	94124	1
CA001000973	012	HUNTERS POINT A WEST	120284	1066 PALOU AVE	2	I	1206	94124	1
CA001000973	012	HUNTERS POINT A WEST	120285	1066 PALOU AVE	1	J	1206	94124	1
CA001000973	012	HUNTERS POINT A WEST	120286	1066 PALOU AVE	1	K	1206	94124	1
CA001000973	012	HUNTERS POINT A WEST	120287	1066 PALOU AVE	2	L	1206	94124	1
CA001000973	012	HUNTERS POINT A WEST	120288	1068 PALOU AVE	4		1206	94124	1
CA001000973	012	HUNTERS POINT A WEST	120291	1080 PALOU AVE	5		1205	94124	1

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address	Bdrm Size	Apt. No.	Bldg No.	Zip Code	Count
CA001000973	012	HUNTERS POINT A WEST	120292	1084 PALOU AVE	5		1205	94124	1
CA001000973	012	HUNTERS POINT A WEST	120293	1088 PALOU AVE	5		1205	94124	1
CA001000973	012	HUNTERS POINT A WEST	120294	1092 PALOU AVE	5		1205	94124	1
CA001000973	012	HUNTERS POINT A WEST	120295	1096 PALOU AVE	2		1225	94124	1
CA001000973	012	HUNTERS POINT A WEST	120296	1100 PALOU AVE	2		1204	94124	1
CA001000973	012	HUNTERS POINT A WEST	120297	1102 PALOU AVE	2		1222	94124	1
CA001000973	012	HUNTERS POINT A WEST	120298	1104 PALOU AVE	2		1204	94124	1
CA001000973	012	HUNTERS POINT A WEST	120299	1106 PALOU AVE	2		1204	94124	1
CA001000973	012	HUNTERS POINT A WEST	120300	1108 PALOU AVE	2		1204	94124	1
CA001000973	012	HUNTERS POINT A WEST	120301	1110 PALOU AVE	2		1204	94124	1
CA001000973	012	HUNTERS POINT A WEST	120302	1130 PALOU AVE	2		1204	94124	1
CA001000973	012	HUNTERS POINT A WEST	120303	1134 PALOU AVE	2		1222	94124	1
CA001000973	012	HUNTERS POINT A WEST	120304	1138 PALOU AVE	2		1222	94124	1
CA001000973	012	HUNTERS POINT A WEST	120305	1142 PALOU AVE	2		1222	94124	1
CA001000973	012	HUNTERS POINT A WEST	120306	1148 PALOU AVE	5		1222	94124	1
CA001000973	012	HUNTERS POINT A WEST	120307	1150 PALOU AVE	2	E	1222	94124	1
CA001000973	012	HUNTERS POINT A WEST	120308	1150 PALOU AVE	2	F	1222	94124	1
CA001000973	012	HUNTERS POINT A WEST	120309	1150 PALOU AVE	2	G	1222	94124	1
CA001000973	012	HUNTERS POINT A WEST	120310	1150 PALOU AVE	2	H	1222	94124	1
CA001000973	012	HUNTERS POINT A WEST	120311	1150 PALOU AVE	2	I	1222	94124	1
CA001000973	012	HUNTERS POINT A WEST	120312	1150 PALOU AVE	2	J	1222	94124	1
CA001000973	012	HUNTERS POINT A WEST	120313	1150 PALOU AVE	2	K	1222	94124	1
CA001000973	012	HUNTERS POINT A WEST	120314	1150 PALOU AVE	2	L	1222	94124	1
CA001000973	012	HUNTERS POINT A WEST	120315	1152 PALOU AVE	5		1222	94124	1
CA001000973	012	HUNTERS POINT A WEST	130065	741 JERROLD AVE	3		1205	94124	1
TOTAL FOR AMP 973									213

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address		Bdrm Size	Bldg No.	Zip Code	Count
CA001000975	016	ALICE GRIFFITH	160097	2400	GRIFFITH ST	4	1625	94124	1
CA001000975	016	ALICE GRIFFITH	160098	2408	GRIFFITH ST	2	1625	94124	1
CA001000975	016	ALICE GRIFFITH	160099	2416	GRIFFITH ST	2	1625	94124	1
CA001000975	016	ALICE GRIFFITH	160100	2424	GRIFFITH ST	2	1625	94124	1
CA001000975	016	ALICE GRIFFITH	160101	2432	GRIFFITH ST	2	1625	94124	1
CA001000975	016	ALICE GRIFFITH	160102	2440	GRIFFITH ST	2	1625	94124	1
CA001000975	016	ALICE GRIFFITH	160103	2448	GRIFFITH ST	2	1625	94124	1
CA001000975	016	ALICE GRIFFITH	160104	2456	GRIFFITH ST	4	1625	94124	1
CA001000975	016	ALICE GRIFFITH	160105	2462	GRIFFITH ST	4	1624	94124	1
CA001000975	016	ALICE GRIFFITH	160106	2468	GRIFFITH ST	2	1624	94124	1
CA001000975	016	ALICE GRIFFITH	160107	2474	GRIFFITH ST	2	1624	94124	1
CA001000975	016	ALICE GRIFFITH	160108	2480	GRIFFITH ST	2	1624	94124	1
CA001000975	016	ALICE GRIFFITH	160109	2484	GRIFFITH ST	5	1624	94124	1
CA001000975	016	ALICE GRIFFITH	160111	2494	GRIFFITH ST	2	1624	94124	1
CA001000975	016	ALICE GRIFFITH	160112	2498	GRIFFITH ST	4	1624	94124	1
CA001000975	016	ALICE GRIFFITH	160113	2500	GRIFFITH ST	1	1623	94124	1
CA001000975	016	ALICE GRIFFITH	160114	2504	GRIFFITH ST	1	1623	94124	1
CA001000975	016	ALICE GRIFFITH	160115	2508	GRIFFITH ST	2	1623	94124	1
CA001000975	016	ALICE GRIFFITH	160116	2512	GRIFFITH ST	2	1623	94124	1
CA001000975	016	ALICE GRIFFITH	160117	2516	GRIFFITH ST	2	1623	94124	1
CA001000975	016	ALICE GRIFFITH	160118	2520	GRIFFITH ST	2	1623	94124	1
CA001000975	016	ALICE GRIFFITH	160119	2524	GRIFFITH ST	2	1623	94124	1
CA001000975	016	ALICE GRIFFITH	160120	2528	GRIFFITH ST	2	1623	94124	1
CA001000975	016	ALICE GRIFFITH	160121	2532	GRIFFITH ST	2	1623	94124	1
CA001000975	016	ALICE GRIFFITH	160122	2536	GRIFFITH ST	2	1623	94124	1
CA001000975	016	ALICE GRIFFITH	160123	2	CAMERON WAY	2	1612	94124	1
CA001000975	016	ALICE GRIFFITH	160124	4	CAMERON WAY	2	1612	94124	1
CA001000975	016	ALICE GRIFFITH	160125	6	CAMERON WAY	4	1612	94124	1
CA001000975	016	ALICE GRIFFITH	160126	8	CAMERON WAY	4	1612	94124	1
CA001000975	016	ALICE GRIFFITH	160127	10	CAMERON WAY	2	1612	94124	1
CA001000975	016	ALICE GRIFFITH	160128	12	CAMERON WAY	2	1612	94124	1
CA001000975	016	ALICE GRIFFITH	160129	14	CAMERON WAY	4	1612	94124	1
CA001000975	016	ALICE GRIFFITH	160130	16	CAMERON WAY	4	1612	94124	1
CA001000975	016	ALICE GRIFFITH	160131	18	CAMERON WAY	2	1612	94124	1
CA001000975	016	ALICE GRIFFITH	160132	20	CAMERON WAY	2	1612	94124	1
CA001000975	016	ALICE GRIFFITH	160133	30	CAMERON WAY	2	1613	94124	1
CA001000975	016	ALICE GRIFFITH	160134	32	CAMERON WAY	2	1613	94124	1
CA001000975	016	ALICE GRIFFITH	160135	34	CAMERON WAY	4	1613	94124	1
CA001000975	016	ALICE GRIFFITH	160136	36	CAMERON WAY	4	1613	94124	1
CA001000975	016	ALICE GRIFFITH	160137	38	CAMERON WAY	2	1614	94124	1
CA001000975	016	ALICE GRIFFITH	160138	40	CAMERON WAY	2	1614	94124	1
CA001000975	016	ALICE GRIFFITH	160139	42	CAMERON WAY	4	1614	94124	1
CA001000975	016	ALICE GRIFFITH	160140	44	CAMERON WAY	4	1614	94124	1
CA001000975	016	ALICE GRIFFITH	160141	46	CAMERON WAY	2	1614	94124	1
CA001000975	016	ALICE GRIFFITH	160142	48	CAMERON WAY	2	1614	94124	1

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address		Bdrm Size	Bldg No.	Zip Code	Count
CA001000975	016	ALICE GRIFFITH	160143	50	CAMERON WAY	4	1615	94124	1
CA001000975	016	ALICE GRIFFITH	160144	52	CAMERON WAY	4	1615	94124	1
CA001000975	016	ALICE GRIFFITH	160145	54	CAMERON WAY	5	1615	94124	1
CA001000975	016	ALICE GRIFFITH	160146	56	CAMERON WAY	5	1615	94124	1
CA001000975	016	ALICE GRIFFITH	160147	58	CAMERON WAY	4	1615	94124	1
CA001000975	016	ALICE GRIFFITH	160148	60	CAMERON WAY	4	1615	94124	1
CA001000975	016	ALICE GRIFFITH	160149	70	CAMERON WAY	4	1616	94124	1
CA001000975	016	ALICE GRIFFITH	160150	72	CAMERON WAY	2	1616	94124	1
CA001000975	016	ALICE GRIFFITH	160151	74	CAMERON WAY	2	1616	94124	1
CA001000975	016	ALICE GRIFFITH	160152	76	CAMERON WAY	2	1616	94124	1
CA001000975	016	ALICE GRIFFITH	160153	78	CAMERON WAY	2	1616	94124	1
CA001000975	016	ALICE GRIFFITH	160154	80	CAMERON WAY	2	1616	94124	1
CA001000975	016	ALICE GRIFFITH	160155	82	CAMERON WAY	2	1616	94124	1
CA001000975	016	ALICE GRIFFITH	160156	84	CAMERON WAY	4	1616	94124	1
CA001000975	016	ALICE GRIFFITH	160157	100	CAMERON WAY	2	1617	94124	1
CA001000975	016	ALICE GRIFFITH	160158	102	CAMERON WAY	2	1617	94124	1
CA001000975	016	ALICE GRIFFITH	160159	104	CAMERON WAY	4	1617	94124	1
CA001000975	016	ALICE GRIFFITH	160160	106	CAMERON WAY	4	1617	94124	1
CA001000975	016	ALICE GRIFFITH	160161	108	CAMERON WAY	2	1617	94124	1
CA001000975	016	ALICE GRIFFITH	160162	110	CAMERON WAY	2	1617	94124	1
CA001000975	016	ALICE GRIFFITH	160163	112	CAMERON WAY	4	1617	94124	1
CA001000975	016	ALICE GRIFFITH	160164	114	CAMERON WAY	4	1617	94124	1
CA001000975	016	ALICE GRIFFITH	160165	116	CAMERON WAY	2	1617	94124	1
CA001000975	016	ALICE GRIFFITH	160166	118	CAMERON WAY	2	1617	94124	1
CA001000975	016	ALICE GRIFFITH	160167	130	CAMERON WAY	4	1618	94124	1
CA001000975	016	ALICE GRIFFITH	160168	132	CAMERON WAY	2	1618	94124	1
CA001000975	016	ALICE GRIFFITH	160169	134	CAMERON WAY	2	1618	94124	1
CA001000975	016	ALICE GRIFFITH	160170	136	CAMERON WAY	2	1618	94124	1
CA001000975	016	ALICE GRIFFITH	160171	140	CAMERON WAY	2	1618	94124	1
CA001000975	016	ALICE GRIFFITH	160172	142	CAMERON WAY	2	1618	94124	1
CA001000975	016	ALICE GRIFFITH	160173	144	CAMERON WAY	2	1618	94124	1
CA001000975	016	ALICE GRIFFITH	160174	146	CAMERON WAY	4	1618	94124	1
CA001000975	016	ALICE GRIFFITH	160175	150	CAMERON WAY	4	1619	94124	1
CA001000975	016	ALICE GRIFFITH	160176	152	CAMERON WAY	4	1619	94124	1
CA001000975	016	ALICE GRIFFITH	160177	154	CAMERON WAY	5	1619	94124	1
CA001000975	016	ALICE GRIFFITH	160178	156	CAMERON WAY	5	1619	94124	1
CA001000975	016	ALICE GRIFFITH	160179	158	CAMERON WAY	4	1619	94124	1
CA001000975	016	ALICE GRIFFITH	160180	160	CAMERON WAY	4	1619	94124	1
CA001000975	016	ALICE GRIFFITH	160181	200	CAMERON WAY	3	1620	94124	1
CA001000975	016	ALICE GRIFFITH	160182	202	CAMERON WAY	3	1620	94124	1
CA001000975	016	ALICE GRIFFITH	160183	204	CAMERON WAY	2	1620	94124	1
CA001000975	016	ALICE GRIFFITH	160184	206	CAMERON WAY	2	1620	94124	1
CA001000975	016	ALICE GRIFFITH	160185	208	CAMERON WAY	3	1620	94124	1
CA001000975	016	ALICE GRIFFITH	160186	210	CAMERON WAY	3	1620	94124	1
CA001000975	016	ALICE GRIFFITH	160187	1	CAMERON WAY	4	1626	94124	1

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address		Bdrm Size	Bldg No.	Zip Code	Count
CA001000975	016	ALICE GRIFFITH	160188	3	CAMERON WAY	4	1626	94124	1
CA001000975	016	ALICE GRIFFITH	160189	5	CAMERON WAY	5	1626	94124	1
CA001000975	016	ALICE GRIFFITH	160190	7	CAMERON WAY	5	1626	94124	1
CA001000975	016	ALICE GRIFFITH	160191	9	CAMERON WAY	4	1626	94124	1
CA001000975	016	ALICE GRIFFITH	160192	11	CAMERON WAY	4	1635	94124	1
CA001000975	016	ALICE GRIFFITH	160193	31	CAMERON WAY	2	1635	94124	1
CA001000975	016	ALICE GRIFFITH	160194	33	CAMERON WAY	2	1635	94124	1
CA001000975	016	ALICE GRIFFITH	160195	35	CAMERON WAY	4	1635	94124	1
CA001000975	016	ALICE GRIFFITH	160196	37	CAMERON WAY	4	1635	94124	1
CA001000975	016	ALICE GRIFFITH	160197	39	CAMERON WAY	2	1635	94124	1
CA001000975	016	ALICE GRIFFITH	160198	41	CAMERON WAY	2	1635	94124	1
CA001000975	016	ALICE GRIFFITH	160199	43	CAMERON WAY	4	1635	94124	1
CA001000975	016	ALICE GRIFFITH	160200	45	CAMERON WAY	4	1635	94124	1
CA001000975	016	ALICE GRIFFITH	160201	47	CAMERON WAY	2	1635	94124	1
CA001000975	016	ALICE GRIFFITH	160202	49	CAMERON WAY	2	1635	94124	1
CA001000975	016	ALICE GRIFFITH	160203	55	CAMERON WAY	3	1636	94124	1
CA001000975	016	ALICE GRIFFITH	160204	57	CAMERON WAY	3	1636	94124	1
CA001000975	016	ALICE GRIFFITH	160205	59	CAMERON WAY	2	1602	94124	1
CA001000975	016	ALICE GRIFFITH	160206	61	CAMERON WAY	2	1636	94124	1
CA001000975	016	ALICE GRIFFITH	160207	63	CAMERON WAY	3	1636	94124	1
CA001000975	016	ALICE GRIFFITH	160208	65	CAMERON WAY	3	1636	94124	1
CA001000975	016	ALICE GRIFFITH	160209	111	CAMERON WAY	3	1637	94124	1
CA001000975	016	ALICE GRIFFITH	160210	115	CAMERON WAY	3	1637	94124	1
CA001000975	016	ALICE GRIFFITH	160211	117	CAMERON WAY	2	1637	94124	1
CA001000975	016	ALICE GRIFFITH	160212	121	CAMERON WAY	2	1637	94124	1
CA001000975	016	ALICE GRIFFITH	160213	123	CAMERON WAY	3	1637	94124	1
CA001000975	016	ALICE GRIFFITH	160214	125	CAMERON WAY	3	1637	94124	1
CA001000975	016	ALICE GRIFFITH	160215	151	CAMERON WAY	4	1642	94124	1
CA001000975	016	ALICE GRIFFITH	160216	153	CAMERON WAY	4	1642	94124	1
CA001000975	016	ALICE GRIFFITH	160217	155	CAMERON WAY	5	1642	94124	1
CA001000975	016	ALICE GRIFFITH	160218	157	CAMERON WAY	5	1642	94124	1
CA001000975	016	ALICE GRIFFITH	160219	159	CAMERON WAY	4	1642	94124	1
CA001000975	016	ALICE GRIFFITH	160220	161	CAMERON WAY	4	1642	94124	1
CA001000975	016	ALICE GRIFFITH	160221	201	CAMERON WAY	4	1621	94124	1
CA001000975	016	ALICE GRIFFITH	160222	203	CAMERON WAY	4	1621	94124	1
CA001000975	016	ALICE GRIFFITH	160223	205	CAMERON WAY	5	1621	94124	1
CA001000975	016	ALICE GRIFFITH	160224	207	CAMERON WAY	5	1621	94124	1
CA001000975	016	ALICE GRIFFITH	160225	209	CAMERON WAY	4	1621	94124	1
CA001000975	016	ALICE GRIFFITH	160226	211	CAMERON WAY	4	1621	94124	1
CA001000975	016	ALICE GRIFFITH	160227	1	NICHOLS WAY	4	1627	94124	1
CA001000975	016	ALICE GRIFFITH	160228	3	NICHOLS WAY	2	1627	94124	1
CA001000975	016	ALICE GRIFFITH	160229	5	NICHOLS WAY	2	1627	94124	1
CA001000975	016	ALICE GRIFFITH	160230	7	NICHOLS WAY	2	1627	94124	1
CA001000975	016	ALICE GRIFFITH	160231	9	NICHOLS WAY	2	1627	94124	1
CA001000975	016	ALICE GRIFFITH	160232	11	NICHOLS WAY	2	1627	94124	1

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address		Bdrm Size	Bldg No.	Zip Code	Count
CA001000975	016	ALICE GRIFFITH	160233	15	NICHOLS WAY	2	1627	94124	1
CA001000975	016	ALICE GRIFFITH	160234	17	NICHOLS WAY	4	1627	94124	1
CA001000975	016	ALICE GRIFFITH	160235	21	NICHOLS WAY	3	1628	94124	1
CA001000975	016	ALICE GRIFFITH	160236	23	NICHOLS WAY	3	1628	94124	1
CA001000975	016	ALICE GRIFFITH	160237	25	NICHOLS WAY	2	1628	94124	1
CA001000975	016	ALICE GRIFFITH	160238	27	NICHOLS WAY	2	1628	94124	1
CA001000975	016	ALICE GRIFFITH	160239	29	NICHOLS WAY	3	1628	94124	1
CA001000975	016	ALICE GRIFFITH	160240	31	NICHOLS WAY	3	1628	94124	1
CA001000975	016	ALICE GRIFFITH	160241	41	NICHOLS WAY	4	1629	94124	1
CA001000975	016	ALICE GRIFFITH	160243	45	NICHOLS WAY	5	1629	94124	1
CA001000975	016	ALICE GRIFFITH	160244	47	NICHOLS WAY	2	1629	94124	1
CA001000975	016	ALICE GRIFFITH	160245	49	NICHOLS WAY	2	1629	94124	1
CA001000975	016	ALICE GRIFFITH	160246	51	NICHOLS WAY	2	1629	94124	1
CA001000975	016	ALICE GRIFFITH	160247	53	NICHOLS WAY	2	1629	94124	1
CA001000975	016	ALICE GRIFFITH	160248	55	NICHOLS WAY	4	1629	94124	1
CA001000975	016	ALICE GRIFFITH	160249	61	NICHOLS WAY	3	1630	94124	1
CA001000975	016	ALICE GRIFFITH	160250	63	NICHOLS WAY	3	1630	94124	1
CA001000975	016	ALICE GRIFFITH	160251	65	NICHOLS WAY	2	1630	94124	1
CA001000975	016	ALICE GRIFFITH	160252	67	NICHOLS WAY	2	1630	94124	1
CA001000975	016	ALICE GRIFFITH	160253	69	NICHOLS WAY	3	1630	94124	1
CA001000975	016	ALICE GRIFFITH	160254	71	NICHOLS WAY	3	1631	94124	1
CA001000975	016	ALICE GRIFFITH	160255	73	NICHOLS WAY	4	1631	94124	1
CA001000975	016	ALICE GRIFFITH	160256	75	NICHOLS WAY	4	1631	94124	1
CA001000975	016	ALICE GRIFFITH	160257	79	NICHOLS WAY	5	1631	94124	1
CA001000975	016	ALICE GRIFFITH	160258	81	NICHOLS WAY	5	1631	94124	1
CA001000975	016	ALICE GRIFFITH	160259	83	NICHOLS WAY	4	1631	94124	1
CA001000975	016	ALICE GRIFFITH	160260	85	NICHOLS WAY	4	1631	94124	1
CA001000975	016	ALICE GRIFFITH	160261	2	NICHOLS WAY	4	1634	94124	1
CA001000975	016	ALICE GRIFFITH	160262	4	NICHOLS WAY	2	1634	94124	1
CA001000975	016	ALICE GRIFFITH	160263	6	NICHOLS WAY	2	1634	94124	1
CA001000975	016	ALICE GRIFFITH	160264	8	NICHOLS WAY	2	1634	94124	1
CA001000975	016	ALICE GRIFFITH	160265	10	NICHOLS WAY	2	1634	94124	1
CA001000975	016	ALICE GRIFFITH	160266	12	NICHOLS WAY	2	1634	94124	1
CA001000975	016	ALICE GRIFFITH	160267	14	NICHOLS WAY	2	1634	94124	1
CA001000975	016	ALICE GRIFFITH	160268	16	NICHOLS WAY	4	1634	94124	1
CA001000975	016	ALICE GRIFFITH	160269	20	NICHOLS WAY	3	1633	94124	1
CA001000975	016	ALICE GRIFFITH	160270	22	NICHOLS WAY	3	1633	94124	1
CA001000975	016	ALICE GRIFFITH	160271	24	NICHOLS WAY	2	1633	94124	1
CA001000975	016	ALICE GRIFFITH	160272	26	NICHOLS WAY	2	1633	94124	1
CA001000975	016	ALICE GRIFFITH	160273	28	NICHOLS WAY	3	1633	94124	1
CA001000975	016	ALICE GRIFFITH	160274	30	NICHOLS WAY	3	1633	94124	1
CA001000975	016	ALICE GRIFFITH	160275	60	NICHOLS WAY	2	1632	94124	1
CA001000975	016	ALICE GRIFFITH	160276	62	NICHOLS WAY	2	1632	94124	1
CA001000975	016	ALICE GRIFFITH	160277	64	NICHOLS WAY	4	1632	94124	1
CA001000975	016	ALICE GRIFFITH	160278	66	NICHOLS WAY	4	1632	94124	1

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address		Bdrm Size	Bldg No.	Zip Code	Count
CA001000975	016	ALICE GRIFFITH	160279	68	NICHOLS WAY	2	1632	94124	1
CA001000975	016	ALICE GRIFFITH	160280	70	NICHOLS WAY	2	1632	94124	1
CA001000975	016	ALICE GRIFFITH	160281	72	NICHOLS WAY	4	1632	94124	1
CA001000975	016	ALICE GRIFFITH	160282	74	NICHOLS WAY	4	1632	94124	1
CA001000975	016	ALICE GRIFFITH	160283	76	NICHOLS WAY	2	1632	94124	1
CA001000975	016	ALICE GRIFFITH	160284	78	NICHOLS WAY	2	1632	94124	1
CA001000975	016	ALICE GRIFFITH	160285	1001	FITZGERALD AVE	4	1602	94124	1
CA001000975	016	ALICE GRIFFITH	160286	1003	FITZGERALD AVE	4	1602	94124	1
CA001000975	016	ALICE GRIFFITH	160287	1005	FITZGERALD AVE	5	1602	94124	1
CA001000975	016	ALICE GRIFFITH	160288	1007	FITZGERALD AVE	5	1602	94124	1
CA001000975	016	ALICE GRIFFITH	160289	1009	FITZGERALD AVE	4	1602	94124	1
CA001000975	016	ALICE GRIFFITH	160290	1011	FITZGERALD AVE	4	1602	94124	1
CA001000975	016	ALICE GRIFFITH	160291	1021	FITZGERALD AVE	2	1622	94124	1
CA001000975	016	ALICE GRIFFITH	160292	1023	FITZGERALD AVE	2	1622	94124	1
CA001000975	016	ALICE GRIFFITH	160293	1025	FITZGERALD AVE	4	1622	94124	1
CA001000975	016	ALICE GRIFFITH	160294	1027	FITZGERALD AVE	4	1604	94124	1
CA001000975	016	ALICE GRIFFITH	160295	1029	FITZGERALD AVE	2	1622	94124	1
CA001000975	016	ALICE GRIFFITH	160296	1031	FITZGERALD AVE	2	1622	94124	1
CA001000975	016	ALICE GRIFFITH	160297	1033	FITZGERALD AVE	4	1622	94124	1
CA001000975	016	ALICE GRIFFITH	160298	1035	FITZGERALD AVE	4	1622	94124	1
CA001000975	016	ALICE GRIFFITH	160299	1037	FITZGERALD AVE	2	1622	94124	1
CA001000975	016	ALICE GRIFFITH	160300	1039	FITZGERALD AVE	2	1622	94124	1
CA001000975	016	ALICE GRIFFITH	160301	1051	FITZGERALD AVE	2	1603	94124	1
CA001000975	016	ALICE GRIFFITH	160302	1053	FITZGERALD AVE	2	1603	94124	1
CA001000975	016	ALICE GRIFFITH	160303	1055	FITZGERALD AVE	2	1603	94124	1
CA001000975	016	ALICE GRIFFITH	160304	1057	FITZGERALD AVE	2	1603	94124	1
CA001000975	016	ALICE GRIFFITH	160305	1059	FITZGERALD AVE	2	1603	94124	1
CA001000975	016	ALICE GRIFFITH	160306	1061	FITZGERALD AVE	2	1603	94124	1
CA001000975	016	ALICE GRIFFITH	160307	1063	FITZGERALD AVE	2	1603	94124	1
CA001000975	016	ALICE GRIFFITH	160308	1065	FITZGERALD AVE	2	1603	94124	1
CA001000975	016	ALICE GRIFFITH	160309	1067	FITZGERALD AVE	1	1603	94124	1
CA001000975	016	ALICE GRIFFITH	160310	1069	FITZGERALD AVE	1	1603	94124	1
CA001000975	016	ALICE GRIFFITH	160311	1000	FITZGERALD AVE	2	1605	94124	1
CA001000975	016	ALICE GRIFFITH	160312	1002	FITZGERALD AVE	2	1605	94124	1
CA001000975	016	ALICE GRIFFITH	160313	1004	FITZGERALD AVE	4	1605	94124	1
CA001000975	016	ALICE GRIFFITH	160314	1006	FITZGERALD AVE	4	1605	94124	1
CA001000975	016	ALICE GRIFFITH	160315	1008	FITZGERALD AVE	2	1605	94124	1
CA001000975	016	ALICE GRIFFITH	160316	1010	FITZGERALD AVE	2	1605	94124	1
CA001000975	016	ALICE GRIFFITH	160317	1012	FITZGERALD AVE	4	1605	94124	1
CA001000975	016	ALICE GRIFFITH	160318	1014	FITZGERALD AVE	4	1605	94124	1
CA001000975	016	ALICE GRIFFITH	160319	1016	FITZGERALD AVE	2	1605	94124	1
CA001000975	016	ALICE GRIFFITH	160320	1018	FITZGERALD AVE	2	1605	94124	1
CA001000975	016	ALICE GRIFFITH	160321	1020	FITZGERALD AVE	4	1604	94124	1
CA001000975	016	ALICE GRIFFITH	160322	1022	FITZGERALD AVE	4	1604	94124	1
CA001000975	016	ALICE GRIFFITH	160323	1024	FITZGERALD AVE	5	1604	94124	1

Potential MOD Units AMPS 968-970-973-975

CA No.	Dev. No.	Development Name	Unit No.	Unit Address	Bdrm Size	Bldg No.	Zip Code	Count
CA001000975	016	ALICE GRIFFITH	160324	1026 FITZGERALD AVE	5	1604	94124	1
CA001000975	016	ALICE GRIFFITH	160325	1028 FITZGERALD AVE	4	1604	94124	1
CA001000975	016	ALICE GRIFFITH	160326	1030 FITZGERALD AVE	4	1604	94124	1
CA001000975	016	ALICE GRIFFITH	160327	1 DOUBLE ROCK ST	2	1638	94124	1
CA001000975	016	ALICE GRIFFITH	160328	3 DOUBLE ROCK ST	2	1638	94124	1
CA001000975	016	ALICE GRIFFITH	160329	5 DOUBLE ROCK ST	2	1638	94124	1
CA001000975	016	ALICE GRIFFITH	160330	7 DOUBLE ROCK ST	2	1638	94124	1
CA001000975	016	ALICE GRIFFITH	160331	9 DOUBLE ROCK ST	2	1638	94124	1
CA001000975	016	ALICE GRIFFITH	160332	11 DOUBLE ROCK ST	2	1638	94124	1
CA001000975	016	ALICE GRIFFITH	160333	15 DOUBLE ROCK ST	2	1638	94124	1
CA001000975	016	ALICE GRIFFITH	160334	17 DOUBLE ROCK ST	2	1638	94124	1
CA001000975	016	ALICE GRIFFITH	160335	19 DOUBLE ROCK ST	1	1638	94124	1
CA001000975	016	ALICE GRIFFITH	160336	21 DOUBLE ROCK ST	1	1638	94124	1
CA001000975	016	ALICE GRIFFITH	160337	2 DOUBLE ROCK ST	1	1641	94124	1
CA001000975	016	ALICE GRIFFITH	160338	4 DOUBLE ROCK ST	1	1641	94124	1
CA001000975	016	ALICE GRIFFITH	160339	6 DOUBLE ROCK ST	2	1641	94124	1
CA001000975	016	ALICE GRIFFITH	160340	8 DOUBLE ROCK ST	2	1641	94124	1
CA001000975	016	ALICE GRIFFITH	160341	10 DOUBLE ROCK ST	2	1641	94124	1
CA001000975	016	ALICE GRIFFITH	160342	12 DOUBLE ROCK ST	2	1641	94124	1
CA001000975	016	ALICE GRIFFITH	160343	14 DOUBLE ROCK ST	2	1641	94124	1
CA001000975	016	ALICE GRIFFITH	160344	16 DOUBLE ROCK ST	2	1641	94124	1
CA001000975	016	ALICE GRIFFITH	160345	18 DOUBLE ROCK ST	2	1641	94124	1
CA001000975	016	ALICE GRIFFITH	160346	20 DOUBLE ROCK ST	2	1641	94124	1
CA001000975	016	ALICE GRIFFITH	160347	100 DOUBLE ROCK ST	4	1640	94124	1
CA001000975	016	ALICE GRIFFITH	160348	102 DOUBLE ROCK ST	2	1640	94124	1
CA001000975	016	ALICE GRIFFITH	160349	104 DOUBLE ROCK ST	2	1639	94124	1
CA001000975	016	ALICE GRIFFITH	160350	106 DOUBLE ROCK ST	2	1639	94124	1
CA001000975	016	ALICE GRIFFITH	160351	108 DOUBLE ROCK ST	2	1640	94124	1
CA001000975	016	ALICE GRIFFITH	160352	110 DOUBLE ROCK ST	2	1640	94124	1
CA001000975	016	ALICE GRIFFITH	160353	112 DOUBLE ROCK ST	2	1640	94124	1
CA001000975	016	ALICE GRIFFITH	160354	114 DOUBLE ROCK ST	4	1640	94124	1
TOTAL FOR AMP 975								256

Potential MOD Units AMPs 969-972-978

AMP	Development	Unit Num	Address		Bed size
000969	WESTSIDE COURT	60113	1454 BAKER ST	113	1
000969	WESTSIDE COURT	60114	1444 BAKER ST	114	2
000969	WESTSIDE COURT	60115	1434 BAKER ST	115	3
000969	WESTSIDE COURT	60116	1424 BAKER ST	116	3
000969	WESTSIDE COURT	60117	1414 BAKER ST	117	2
000969	WESTSIDE COURT	60118	1408 BAKER ST	118	1
000969	WESTSIDE COURT	60119	1400 BAKER ST	119	2
000969	WESTSIDE COURT	60120	2492 POST ST	120	1
000969	WESTSIDE COURT	60121	2486 POST ST	121	1
000969	WESTSIDE COURT	60122	2480 POST ST	122	1
000969	WESTSIDE COURT	60123	2474 POST ST	123	1
000969	WESTSIDE COURT	60124	2468 POST ST	124	4
000969	WESTSIDE COURT	60125	2545 SUTTER ST	125	3
000969	WESTSIDE COURT	60127	2549 SUTTER ST	127	1
000969	WESTSIDE COURT	60128	2551 SUTTER ST	128	1
000969	WESTSIDE COURT	60129	2553 SUTTER ST	129	1
000969	WESTSIDE COURT	60130	2555 SUTTER ST	130	3
000969	WESTSIDE COURT	60131	2535 SUTTER ST	131	4
000969	WESTSIDE COURT	60132	2529 SUTTER ST	132	1
000969	WESTSIDE COURT	60133	2523 SUTTER ST	133	1
000969	WESTSIDE COURT	60134	2517 SUTTER ST	134	1
000969	WESTSIDE COURT	60135	2511 SUTTER ST	135	1
000969	WESTSIDE COURT	60136	1565 BRODERICK ST	136	2
000969	WESTSIDE COURT	60137	1555 BRODERICK ST	137	1
000969	WESTSIDE COURT	60138	1545 BRODERICK ST	138	2
000969	WESTSIDE COURT	60139	1535 BRODERICK ST	139	3
000969	WESTSIDE COURT	60140	1525 BRODERICK ST	140	3
000969	WESTSIDE COURT	60141	1515 BRODERICK ST	141	2
000969	WESTSIDE COURT	60142	1509 BRODERICK ST	142	1
000969	WESTSIDE COURT	60143	1501 BRODERICK ST	143	2
000969	WESTSIDE COURT	60144	2410 POST ST	144	1
000969	WESTSIDE COURT	60145	2416 POST ST	145	1
000969	WESTSIDE COURT	60146	2422 POST ST	146	1
000969	WESTSIDE COURT	60147	2428 POST ST	147	1
000969	WESTSIDE COURT	60211	2593 SUTTER ST	211	1
000969	WESTSIDE COURT	60212	1464 BAKER ST	212	2
000969	WESTSIDE COURT	60213	1454 BAKER ST	213	1
000969	WESTSIDE COURT	60214	1444 BAKER ST	214	2
000969	WESTSIDE COURT	60215	1434 BAKER ST	215	3
000969	WESTSIDE COURT	60216	1424 BAKER ST	216	3
000969	WESTSIDE COURT	60217	1414 BAKER ST	217	2
000969	WESTSIDE COURT	60218	1408 BAKER ST	218	1
000969	WESTSIDE COURT	60219	1400 BAKER ST	219	2
000969	WESTSIDE COURT	60220	2492 POST ST	220	1
000969	WESTSIDE COURT	60221	2486 POST ST	221	1
000969	WESTSIDE COURT	60222	2480 POST ST	222	1
000969	WESTSIDE COURT	60223	2474 POST ST	223	1
000969	WESTSIDE COURT	60224	2468 POST ST	224	4
000969	WESTSIDE COURT	60225	2545 SUTTER ST	225	3
000969	WESTSIDE COURT	60226	2547 SUTTER ST	226	1
000969	WESTSIDE COURT	60227	2549 SUTTER ST	227	1
000969	WESTSIDE COURT	60228	2551 SUTTER ST	228	1
000969	WESTSIDE COURT	60229	2553 SUTTER ST	229	1
000969	WESTSIDE COURT	60230	2555 SUTTER ST	230	3
000969	WESTSIDE COURT	60231	2535 SUTTER ST	231	4
000969	WESTSIDE COURT	60232	2529 SUTTER ST	232	1
000969	WESTSIDE COURT	60233	2523 SUTTER ST	233	1
000969	WESTSIDE COURT	60234	2517 SUTTER ST	234	1
000969	WESTSIDE COURT	60235	2511 SUTTER ST	235	1
000969	WESTSIDE COURT	60236	1565 BRODERICK ST	236	2
000969	WESTSIDE COURT	60237	1555 BRODERICK ST	237	1
000969	WESTSIDE COURT	60238	1545 BRODERICK ST	238	2
000969	WESTSIDE COURT	60239	1535 BRODERICK ST	239	3

Potential MOD Units AMPs 969-972-978

AMP	Development	Unit Num	Address	Bed size	
000969	WESTSIDE COURT	60240	1525 BRODERICK ST	240	3
000969	WESTSIDE COURT	60241	1515 BRODERICK ST	241	2
000969	WESTSIDE COURT	60242	1509 BRODERICK ST	242	1
000969	WESTSIDE COURT	60243	1501 BRODERICK ST	243	2
000969	WESTSIDE COURT	60244	2410 POST ST	244	1
000969	WESTSIDE COURT	60245	2416 POST ST	245	1
000969	WESTSIDE COURT	60246	2422 POST ST	246	1
000969	WESTSIDE COURT	60247	2428 POST ST	247	1
000969	WESTSIDE COURT	60248	2434 POST ST	248	4
000969	WESTSIDE COURT	60301	2567 SUTTER ST	301	3
000969	WESTSIDE COURT	60302	2565 SUTTER ST	302	1
000969	WESTSIDE COURT	60303	2565 SUTTER ST	303	1
000969	WESTSIDE COURT	60304	2561 SUTTER ST	304	1
000969	WESTSIDE COURT	60101	2567 SUTTER ST	101	3
000969	WESTSIDE COURT	60102	2565 SUTTER ST	102	1
000969	WESTSIDE COURT	60103	2563 SUTTER ST	103	1
000969	WESTSIDE COURT	60104	2561 SUTTER ST	104	1
000969	WESTSIDE COURT	60105	2559 SUTTER ST	105	1
000969	WESTSIDE COURT	60106	2557 SUTTER ST	106	3
000969	WESTSIDE COURT	60107	2569 SUTTER ST	107	4
000969	WESTSIDE COURT	60108	2575 SUTTER ST	108	1
000969	WESTSIDE COURT	60109	2581 SUTTER ST	109	1
000969	WESTSIDE COURT	60110	2587 SUTTER ST	110	1
000969	WESTSIDE COURT	60111	2593 SUTTER ST	111	1
000969	WESTSIDE COURT	60201	2567 SUTTER ST	201	3
000969	WESTSIDE COURT	60202	2565 SUTTER ST	202	1
000969	WESTSIDE COURT	60203	2563 SUTTER ST	203	1
000969	WESTSIDE COURT	60204	2561 SUTTER ST	204	1
000969	WESTSIDE COURT	60205	2559 SUTTER ST	205	1
000969	WESTSIDE COURT	60206	2557 SUTTER ST	206	3
000969	WESTSIDE COURT	60207	2569 SUTTER ST	207	4
000969	WESTSIDE COURT	60208	2575 SUTTER ST	208	1
000969	WESTSIDE COURT	60209	2581 SUTTER ST	209	1
000969	WESTSIDE COURT	60311	2593 SUTTER ST	311	1
000969	WESTSIDE COURT	60312	1464 BAKER ST	312	2
000969	WESTSIDE COURT	60313	1454 BAKER ST	313	1
000969	WESTSIDE COURT	60314	1444 BAKER ST	314	2
000969	WESTSIDE COURT	60317	1414 BAKER ST	317	2
000969	WESTSIDE COURT	60318	1408 BAKER ST	318	1
000969	WESTSIDE COURT	60319	1400 BAKER ST	319	2
000969	WESTSIDE COURT	60320	2492 POST ST	320	1
000969	WESTSIDE COURT	60321	2486 POST ST	321	1
000969	WESTSIDE COURT	60322	2480 POST ST	322	1
000969	WESTSIDE COURT	60323	2474 POST ST	323	1
000969	WESTSIDE COURT	60325	2545 SUTTER ST	325	3
000969	WESTSIDE COURT	60326	2547 SUTTER ST	326	1
000969	WESTSIDE COURT	60327	2549 SUTTER ST	327	1
000969	WESTSIDE COURT	60328	2551 SUTTER ST	328	1
000969	WESTSIDE COURT	60329	2553 SUTTER ST	329	1
000969	WESTSIDE COURT	60330	2555 SUTTER ST	330	3
000969	WESTSIDE COURT	60332	2529 SUTTER ST	332	1
000969	WESTSIDE COURT	60333	2523 SUTTER ST	333	1
000969	WESTSIDE COURT	60334	2517 SUTTER ST	334	1
000969	WESTSIDE COURT	60335	2511 SUTTER ST	335	1
000969	WESTSIDE COURT	60336	1565 BRODERICK ST	336	2
000969	WESTSIDE COURT	60337	1555 BRODERICK ST	337	1
000969	WESTSIDE COURT	60338	1545 BRODERICK ST	338	2
000969	WESTSIDE COURT	60342	1509 BRODERICK ST	342	1
000969	WESTSIDE COURT	60343	1501 BRODERICK ST	343	2
000969	WESTSIDE COURT	60344	2410 POST ST	344	1
000969	WESTSIDE COURT	60345	2416 POST ST	345	1
000969	WESTSIDE COURT	60346	2422 POST ST	346	1
000969	WESTSIDE COURT	60306	2557 SUTTER ST	306	3

Potential MOD Units AMPs 969-972-978

AMP	Development	Unit Num	Address	Bed size
000969	WESTSIDE COURT	60309	2581 SUTTER ST	309 1
LEASED AND OCCUPIED				
000969	WESTSIDE COURT	60310	2587 SUTTER ST	310 1
000969	WESTSIDE COURT	60308	2575 SUTTER ST	308 1
000969	WESTSIDE COURT	60347	2428 POST ST	347 1
000969	WESTSIDE COURT	60341	1515 BRODERICK ST	341 2
000969	WESTSIDE COURT	60210	2587 SUTTER ST	210 1
000969	WESTSIDE COURT	60112	1464 BAKER ST	112 2
000969	WESTSIDE COURT	60305	2559 SUTTER ST	305 1
000969	WESTSIDE COURT	60148	2434 POST ST	148 4
Vacancy Master 135 WESTSIDE COURT				
000972	227 BAY STREET	240110	227 BAY ST	110 0
000972	227 BAY STREET	240111	227 BAY ST	111 0
000972	227 BAY STREET	240112	227 BAY ST	112 0
000972	227 BAY STREET	240114	227 BAY ST	114 0
000972	227 BAY STREET	240115	227 BAY ST	115 0
000972	227 BAY STREET	240116	227 BAY ST	116 0
000972	227 BAY STREET	240117	227 BAY ST	117 0
000972	227 BAY STREET	240118	227 BAY ST	118 0
000972	227 BAY STREET	240201	227 BAY ST	201 0
000972	227 BAY STREET	240202	227 BAY ST	202 0
000972	227 BAY STREET	240203	227 BAY ST	203 0
000972	227 BAY STREET	240204	227 BAY ST	204 0
000972	227 BAY STREET	240205	227 BAY ST	205 0
000972	227 BAY STREET	240206	227 BAY ST	206 0
000972	227 BAY STREET	240207	227 BAY ST	207 0
000972	227 BAY STREET	240208	227 BAY ST	208 1
000972	227 BAY STREET	240209	227 BAY ST	209 0
000972	227 BAY STREET	240210	227 BAY ST	210 0
000972	227 BAY STREET	240211	227 BAY ST	211 0
000972	227 BAY STREET	240212	227 BAY ST	212 0
000972	227 BAY STREET	240214	227 BAY ST	214 0
000972	227 BAY STREET	240215	227 BAY ST	215 0
000972	227 BAY STREET	240216	227 BAY ST	216 0
000972	227 BAY STREET	240217	227 BAY ST	217 0
000972	227 BAY STREET	240218	227 BAY ST	218 0
000972	227 BAY STREET	240301	227 BAY ST	301 0
000972	227 BAY STREET	240302	227 BAY ST	302 0
000972	227 BAY STREET	240303	227 BAY ST	303 0
000972	227 BAY STREET	240304	227 BAY ST	304 0
000972	227 BAY STREET	240305	227 BAY ST	305 0
000972	227 BAY STREET	240306	227 BAY ST	306 0
000972	227 BAY STREET	240307	227 BAY ST	307 0
000972	227 BAY STREET	240308	227 BAY ST	308 1
000972	227 BAY STREET	240309	227 BAY ST	309 0
000972	227 BAY STREET	240310	227 BAY ST	310 0
000972	227 BAY STREET	240101	227 BAY ST	101 0
000972	227 BAY STREET	240102	227 BAY ST	102 0
000972	227 BAY STREET	240103	227 BAY ST	103 0
000972	227 BAY STREET	240104	227 BAY ST	104 0
000972	227 BAY STREET	240105	227 BAY ST	105 0
000972	227 BAY STREET	240106	227 BAY ST	106 0
000972	227 BAY STREET	240107	227 BAY ST	107 0
000972	227 BAY STREET	240317	227 BAY ST	317 0
000972	227 BAY STREET	240318	227 BAY ST	318 0
000972	227 BAY STREET	240312	227 BAY ST	312 0
000972	227 BAY STREET	240314	227 BAY ST	314 0
000972	227 BAY STREET	240315	227 BAY ST	315 0
LEASED AND OCCUPIED				
000972	227 BAY STREET	240316	227 BAY ST	316 0
000972	227 BAY STREET	240109	227 BAY ST	109 0
000972	227 BAY STREET	240311	227 BAY ST	311 0

Potential MOD Units AMPs 969-972-978

AMP	Development	Unit Num	Address	Bed size
		Vacancy Master 50 27 BAY STREET		
000972	PING YUEN	100218	711 PACIFIC AVE	218 3
000972	PING YUEN	100219	711 PACIFIC AVE	219 1
000972	PING YUEN	100220	711 PACIFIC AVE	220 3
000972	PING YUEN	100221	795 PACIFIC AVE	221 3
000972	PING YUEN	100222	795 PACIFIC AVE	222 1
000972	PING YUEN	100223	795 PACIFIC AVE	223 3
000972	PING YUEN	100224	795 PACIFIC AVE	224 2
000972	PING YUEN	100226	795 PACIFIC AVE	226 2
000972	PING YUEN	100231	895 PACIFIC AVE	231 3
000972	PING YUEN	100232	895 PACIFIC AVE	232 1
000972	PING YUEN	100233	895 PACIFIC AVE	233 3
000972	PING YUEN	100234	895 PACIFIC AVE	234 2
000972	PING YUEN	100235	895 PACIFIC AVE	235 2
000972	PING YUEN	100236	895 PACIFIC AVE	236 2
000972	PING YUEN	100237	895 PACIFIC AVE	237 4
000972	PING YUEN	100238	895 PACIFIC AVE	238 2
000972	PING YUEN	100637	895 PACIFIC AVE	637 4
000972	PING YUEN	100638	895 PACIFIC AVE	638 2
000972	PING YUEN	100639	895 PACIFIC AVE	639 1
000972	PING YUEN	100640	895 PACIFIC AVE	640 3
000972	PING YUEN	100720	711 PACIFIC AVE	720 3
000972	PING YUEN	100721	795 PACIFIC AVE	721 3
000972	PING YUEN	100727	795 PACIFIC AVE	727 4
000972	PING YUEN	100728	795 PACIFIC AVE	728 2
000972	PING YUEN	100729	795 PACIFIC AVE	729 1
000972	PING YUEN	100730	795 PACIFIC AVE	730 3
000972	PING YUEN	100014	711 PACIFIC AVE	14 3
000972	PING YUEN	100015	711 PACIFIC AVE	15 2
000972	PING YUEN	100016	711 PACIFIC AVE	16 2
000972	PING YUEN	100031	895 PACIFIC AVE	31 3
000972	PING YUEN	100032	895 PACIFIC AVE	32 1
000972	PING YUEN	100033	895 PACIFIC AVE	33 3
000972	PING YUEN	100101	655 PACIFIC AVE	101 3
000972	PING YUEN	100102	655 PACIFIC AVE	102 1
000972	PING YUEN	100103	655 PACIFIC AVE	103 3
000972	PING YUEN	100104	655 PACIFIC AVE	104 2
000972	PING YUEN	100105	655 PACIFIC AVE	105 2
000972	PING YUEN	100106	655 PACIFIC AVE	106 2
000972	PING YUEN	100110	655 PACIFIC AVE	110 3
000972	PING YUEN	100111	711 PACIFIC AVE	111 4
000972	PING YUEN	100112	711 PACIFIC AVE	112 2
000972	PING YUEN	100113	711 PACIFIC AVE	113 1
000972	PING YUEN	100114	711 PACIFIC AVE	114 3
000972	PING YUEN	100115	711 PACIFIC AVE	115 2
000972	PING YUEN	100116	711 PACIFIC AVE	116 2
000972	PING YUEN	100117	711 PACIFIC AVE	117 2
000972	PING YUEN	100118	711 PACIFIC AVE	118 3
000972	PING YUEN	100119	711 PACIFIC AVE	119 1
000972	PING YUEN	100120	711 PACIFIC AVE	120 3
000972	PING YUEN	100121	795 PACIFIC AVE	121 3
000972	PING YUEN	100122	795 PACIFIC AVE	122 1
000972	PING YUEN	100131	895 PACIFIC AVE	131 3
000972	PING YUEN	100132	895 PACIFIC AVE	132 1
000972	PING YUEN	100133	895 PACIFIC AVE	133 3
000972	PING YUEN	100134	895 PACIFIC AVE	134 2
000972	PING YUEN	100135	895 PACIFIC AVE	135 2
000972	PING YUEN	100136	895 PACIFIC AVE	136 2
000972	PING YUEN	100140	895 PACIFIC AVE	140 3
000972	PING YUEN	100201	655 PACIFIC AVE	201 3
000972	PING YUEN	100202	655 PACIFIC AVE	202 1
000972	PING YUEN	100203	655 PACIFIC AVE	203 3

Potential MOD Units AMPs 969-972-978

AMP	Development	Unit Num	Address	Bed size	
000972	PING YUEN	100204	655 PACIFIC AVE	204	2
000972	PING YUEN	100205	655 PACIFIC AVE	205	2
000972	PING YUEN	100206	655 PACIFIC AVE	206	2
000972	PING YUEN	100207	655 PACIFIC AVE	207	4
000972	PING YUEN	100208	655 PACIFIC AVE	208	2
000972	PING YUEN	100209	655 PACIFIC AVE	209	1
000972	PING YUEN	100210	655 PACIFIC AVE	210	3
000972	PING YUEN	100211	711 PACIFIC AVE	211	4
000972	PING YUEN	100212	711 PACIFIC AVE	212	2
000972	PING YUEN	100213	711 PACIFIC AVE	213	1
000972	PING YUEN	100214	711 PACIFIC AVE	214	3
000972	PING YUEN	100215	711 PACIFIC AVE	215	2
000972	PING YUEN	100216	711 PACIFIC AVE	216	2
000972	PING YUEN	100240	895 PACIFIC AVE	240	3
000972	PING YUEN	100301	655 PACIFIC AVE	301	3
000972	PING YUEN	100302	655 PACIFIC AVE	302	1
000972	PING YUEN	100303	655 PACIFIC AVE	303	3
000972	PING YUEN	100304	655 PACIFIC AVE	304	2
000972	PING YUEN	100305	655 PACIFIC AVE	305	2
000972	PING YUEN	100306	655 PACIFIC AVE	306	2
000972	PING YUEN	100307	655 PACIFIC AVE	307	4
000972	PING YUEN	100308	655 PACIFIC AVE	308	2
000972	PING YUEN	100309	655 PACIFIC AVE	309	1
000972	PING YUEN	100310	655 PACIFIC AVE	310	3
000972	PING YUEN	100311	711 PACIFIC AVE	311	4
000972	PING YUEN	100312	711 PACIFIC AVE	312	2
000972	PING YUEN	100313	711 PACIFIC AVE	313	1
000972	PING YUEN	100314	711 PACIFIC AVE	314	3
000972	PING YUEN	100315	711 PACIFIC AVE	315	2
000972	PING YUEN	100316	711 PACIFIC AVE	316	2
000972	PING YUEN	100317	711 PACIFIC AVE	317	2
000972	PING YUEN	100318	711 PACIFIC AVE	318	3
000972	PING YUEN	100319	711 PACIFIC AVE	319	1
000972	PING YUEN	100320	711 PACIFIC AVE	320	3
000972	PING YUEN	100321	795 PACIFIC AVE	321	3
000972	PING YUEN	100322	795 PACIFIC AVE	322	1
000972	PING YUEN	100323	795 PACIFIC AVE	323	3
000972	PING YUEN	100324	795 PACIFIC AVE	324	2
000972	PING YUEN	100325	795 PACIFIC AVE	325	2
000972	PING YUEN	100326	795 PACIFIC AVE	326	2
000972	PING YUEN	100327	795 PACIFIC AVE	327	4
000972	PING YUEN	100328	795 PACIFIC AVE	328	2
000972	PING YUEN	100329	795 PACIFIC AVE	329	1
000972	PING YUEN	100330	795 PACIFIC AVE	330	3
000972	PING YUEN	100331	895 PACIFIC AVE	331	3
000972	PING YUEN	100332	895 PACIFIC AVE	332	1
000972	PING YUEN	100333	895 PACIFIC AVE	333	3
000972	PING YUEN	100334	895 PACIFIC AVE	334	2
000972	PING YUEN	100335	895 PACIFIC AVE	335	2
000972	PING YUEN	100336	895 PACIFIC AVE	336	2
000972	PING YUEN	100337	895 PACIFIC AVE	337	4
000972	PING YUEN	100338	895 PACIFIC AVE	338	2
000972	PING YUEN	100339	895 PACIFIC AVE	339	1
000972	PING YUEN	100340	895 PACIFIC AVE	340	3
000972	PING YUEN	100401	655 PACIFIC AVE	401	3
000972	PING YUEN	100402	655 PACIFIC AVE	402	1
000972	PING YUEN	100403	655 PACIFIC AVE	403	3
000972	PING YUEN	100404	655 PACIFIC AVE	404	2
000972	PING YUEN	100405	655 PACIFIC AVE	405	2
000972	PING YUEN	100406	655 PACIFIC AVE	406	2
000972	PING YUEN	100407	655 PACIFIC AVE	407	4
000972	PING YUEN	100408	655 PACIFIC AVE	408	2
000972	PING YUEN	100409	655 PACIFIC AVE	409	1

Potential MOD Units AMPs 969-972-978

AMP	Development	Unit Num	Address	Bed size
000972	PING YUEN	100410	655 PACIFIC AVE	410 3
000972	PING YUEN	100411	711 PACIFIC AVE	411 4
000972	PING YUEN	100412	711 PACIFIC AVE	412 2
000972	PING YUEN	100413	711 PACIFIC AVE	413 1
000972	PING YUEN	100414	711 PACIFIC AVE	414 3
000972	PING YUEN	100415	711 PACIFIC AVE	415 2
000972	PING YUEN	100416	711 PACIFIC AVE	416 2
000972	PING YUEN	100417	711 PACIFIC AVE	417 2
000972	PING YUEN	100418	711 PACIFIC AVE	418 3
000972	PING YUEN	100419	711 PACIFIC AVE	419 1
000972	PING YUEN	100420	711 PACIFIC AVE	420 3
000972	PING YUEN	100421	795 PACIFIC AVE	421 3
000972	PING YUEN	100422	795 PACIFIC AVE	422 1
000972	PING YUEN	100423	795 PACIFIC AVE	423 3
000972	PING YUEN	100424	795 PACIFIC AVE	424 2
000972	PING YUEN	100425	795 PACIFIC AVE	425 2
000972	PING YUEN	100426	795 PACIFIC AVE	426 2
000972	PING YUEN	100427	795 PACIFIC AVE	427 4
000972	PING YUEN	100428	795 PACIFIC AVE	428 2
000972	PING YUEN	100429	795 PACIFIC AVE	429 1
000972	PING YUEN	100430	795 PACIFIC AVE	430 3
000972	PING YUEN	100431	895 PACIFIC AVE	431 3
000972	PING YUEN	100432	895 PACIFIC AVE	432 1
000972	PING YUEN	100433	895 PACIFIC AVE	433 3
000972	PING YUEN	100434	895 PACIFIC AVE	434 2
000972	PING YUEN	100435	895 PACIFIC AVE	435 2
000972	PING YUEN	100436	895 PACIFIC AVE	436 2
000972	PING YUEN	100437	895 PACIFIC AVE	437 4
000972	PING YUEN	100439	895 PACIFIC AVE	439 1
000972	PING YUEN	100440	895 PACIFIC AVE	440 3
000972	PING YUEN	100501	655 PACIFIC AVE	501 3
000972	PING YUEN	100502	655 PACIFIC AVE	502 1
000972	PING YUEN	100503	655 PACIFIC AVE	503 3
000972	PING YUEN	100504	655 PACIFIC AVE	504 2
000972	PING YUEN	100505	655 PACIFIC AVE	505 2
000972	PING YUEN	100506	655 PACIFIC AVE	506 2
000972	PING YUEN	100507	655 PACIFIC AVE	507 4
000972	PING YUEN	100508	655 PACIFIC AVE	508 2
000972	PING YUEN	100509	655 PACIFIC AVE	509 1
000972	PING YUEN	100510	655 PACIFIC AVE	510 3
000972	PING YUEN	100511	711 PACIFIC AVE	511 4
000972	PING YUEN	100512	711 PACIFIC AVE	512 2
000972	PING YUEN	100513	711 PACIFIC AVE	513 1
000972	PING YUEN	100514	711 PACIFIC AVE	514 3
000972	PING YUEN	100515	711 PACIFIC AVE	515 2
000972	PING YUEN	100516	711 PACIFIC AVE	516 2
000972	PING YUEN	100517	711 PACIFIC AVE	517 2
000972	PING YUEN	100518	711 PACIFIC AVE	518 3
000972	PING YUEN	100519	711 PACIFIC AVE	519 1
000972	PING YUEN	100520	711 PACIFIC AVE	520 3
000972	PING YUEN	100521	795 PACIFIC AVE	521 3
000972	PING YUEN	100522	795 PACIFIC AVE	522 1
000972	PING YUEN	100523	795 PACIFIC AVE	523 3
000972	PING YUEN	100524	795 PACIFIC AVE	524 2
000972	PING YUEN	100525	795 PACIFIC AVE	525 2
000972	PING YUEN	100526	795 PACIFIC AVE	526 2
000972	PING YUEN	100527	795 PACIFIC AVE	527 4
000972	PING YUEN	100528	795 PACIFIC AVE	528 2
000972	PING YUEN	100529	795 PACIFIC AVE	529 1
000972	PING YUEN	100530	795 PACIFIC AVE	530 3
000972	PING YUEN	100531	895 PACIFIC AVE	531 3
000972	PING YUEN	100532	895 PACIFIC AVE	532 1
000972	PING YUEN	100533	895 PACIFIC AVE	533 3

Potential MOD Units AMPs 969-972-978

AMP	Development	Unit Num	Address	Bed size
000972	PING YUEN	100534	895 PACIFIC AVE	534 2
000972	PING YUEN	100535	895 PACIFIC AVE	535 2
000972	PING YUEN	100536	895 PACIFIC AVE	536 2
000972	PING YUEN	100537	895 PACIFIC AVE	537 4
000972	PING YUEN	100538	895 PACIFIC AVE	538 2
000972	PING YUEN	100539	895 PACIFIC AVE	539 1
000972	PING YUEN	100540	895 PACIFIC AVE	540 3
000972	PING YUEN	100601	655 PACIFIC AVE	601 3
000972	PING YUEN	100602	655 PACIFIC AVE	602 1
000972	PING YUEN	100603	655 PACIFIC AVE	603 3
000972	PING YUEN	100604	655 PACIFIC AVE	604 2
000972	PING YUEN	100605	655 PACIFIC AVE	605 2
000972	PING YUEN	100606	655 PACIFIC AVE	606 2
000972	PING YUEN	100607	655 PACIFIC AVE	607 4
000972	PING YUEN	100608	655 PACIFIC AVE	608 2
000972	PING YUEN	100609	655 PACIFIC AVE	609 1
000972	PING YUEN	100610	655 PACIFIC AVE	610 3
000972	PING YUEN	100611	711 PACIFIC AVE	611 4
000972	PING YUEN	100612	711 PACIFIC AVE	612 2
000972	PING YUEN	100613	711 PACIFIC AVE	613 1
000972	PING YUEN	100614	711 PACIFIC AVE	614 3
000972	PING YUEN	100615	711 PACIFIC AVE	615 2
000972	PING YUEN	100616	711 PACIFIC AVE	616 2
000972	PING YUEN	100617	711 PACIFIC AVE	617 2
000972	PING YUEN	100618	711 PACIFIC AVE	618 3
000972	PING YUEN	100619	711 PACIFIC AVE	619 1
000972	PING YUEN	100620	711 PACIFIC AVE	620 3
000972	PING YUEN	100621	795 PACIFIC AVE	621 3
000972	PING YUEN	100622	795 PACIFIC AVE	622 1
000972	PING YUEN	100623	795 PACIFIC AVE	623 3
000972	PING YUEN	100624	795 PACIFIC AVE	624 2
000972	PING YUEN	100625	795 PACIFIC AVE	625 2
000972	PING YUEN	100626	795 PACIFIC AVE	626 2
000972	PING YUEN	100627	795 PACIFIC AVE	627 4
000972	PING YUEN	100628	795 PACIFIC AVE	628 2
000972	PING YUEN	100629	795 PACIFIC AVE	629 1
000972	PING YUEN	100630	795 PACIFIC AVE	630 3
000972	PING YUEN	100631	895 PACIFIC AVE	631 3
000972	PING YUEN	100632	895 PACIFIC AVE	632 1
000972	PING YUEN	100633	895 PACIFIC AVE	633 3
000972	PING YUEN	100634	895 PACIFIC AVE	634 2
000972	PING YUEN	100635	895 PACIFIC AVE	635 2
LEASED AND OCCUPIED				
000972	PING YUEN	100636	895 PACIFIC AVE	636 2
Modernization				
000972	PING YUEN	100217	711 PACIFIC AVE	217 2
000972	PING YUEN	100239	895 PACIFIC AVE	239 1
Vacancy Master				
000972	PING YUEN	100438	895 PACIFIC AVE	438 2
VACANT AVAILABLE				
233 PING YUEN				
283		000972		
000978	ROSA PARK APARTMEI	171117	1251 TURK ST	1117 1
000978	ROSA PARK APARTMEI	171118	1251 TURK ST	1118 2
000978	ROSA PARK APARTMEI	171119	1251 TURK ST	1119 2
000978	ROSA PARK APARTMEI	171120	1251 TURK ST	1120 1
000978	ROSA PARK APARTMEI	170709	1251 TURK ST	709 2
000978	ROSA PARK APARTMEI	170710	1251 TURK ST	710 2
000978	ROSA PARK APARTMEI	170711	1251 TURK ST	711 1
000978	ROSA PARK APARTMEI	170712	1251 TURK ST	712 2
000978	ROSA PARK APARTMEI	170713	1251 TURK ST	713 2
000978	ROSA PARK APARTMEI	170714	1251 TURK ST	714 2
000978	ROSA PARK APARTMEI	170715	1251 TURK ST	715 2

Potential MOD Units AMPs 969-972-978

AMP	Development	Unit Num	Address	Bed size
000978	ROSA PARK APARTMEI	170716	1251 TURK ST	716 0
000978	ROSA PARK APARTMEI	170717	1251 TURK ST	717 1
000978	ROSA PARK APARTMEI	170718	1251 TURK ST	718 2
000978	ROSA PARK APARTMEI	170719	1251 TURK ST	719 2
000978	ROSA PARK APARTMEI	170514	1251 TURK ST	514 2
000978	ROSA PARK APARTMEI	170515	1251 TURK ST	515 2
000978	ROSA PARK APARTMEI	170516	1251 TURK ST	516 0
000978	ROSA PARK APARTMEI	170517	1251 TURK ST	517 1
000978	ROSA PARK APARTMEI	170518	1251 TURK ST	518 2
000978	ROSA PARK APARTMEI	170519	1251 TURK ST	519 2
000978	ROSA PARK APARTMEI	170520	1251 TURK ST	520 1
000978	ROSA PARK APARTMEI	170601	1251 TURK ST	601 1
000978	ROSA PARK APARTMEI	170602	1251 TURK ST	602 1
000978	ROSA PARK APARTMEI	170603	1251 TURK ST	603 1
000978	ROSA PARK APARTMEI	170604	1251 TURK ST	604 1
000978	ROSA PARK APARTMEI	170605	1251 TURK ST	605 1
000978	ROSA PARK APARTMEI	170606	1251 TURK ST	606 1
000978	ROSA PARK APARTMEI	170608	1251 TURK ST	608 1
000978	ROSA PARK APARTMEI	170609	1251 TURK ST	609 2
000978	ROSA PARK APARTMEI	170610	1251 TURK ST	610 2
000978	ROSA PARK APARTMEI	170611	1251 TURK ST	611 1
000978	ROSA PARK APARTMEI	170612	1251 TURK ST	612 2
000978	ROSA PARK APARTMEI	170613	1251 TURK ST	613 2
000978	ROSA PARK APARTMEI	170614	1251 TURK ST	614 2
000978	ROSA PARK APARTMEI	170615	1251 TURK ST	615 2
000978	ROSA PARK APARTMEI	170616	1251 TURK ST	616 0
000978	ROSA PARK APARTMEI	170617	1251 TURK ST	617 1
000978	ROSA PARK APARTMEI	170618	1251 TURK ST	618 2
000978	ROSA PARK APARTMEI	170619	1251 TURK ST	619 2
000978	ROSA PARK APARTMEI	170620	1251 TURK ST	620 1
000978	ROSA PARK APARTMEI	170701	1251 TURK ST	701 1
000978	ROSA PARK APARTMEI	170702	1251 TURK ST	702 1
000978	ROSA PARK APARTMEI	170703	1251 TURK ST	703 1
000978	ROSA PARK APARTMEI	170704	1251 TURK ST	704 1
000978	ROSA PARK APARTMEI	170705	1251 TURK ST	705 1
000978	ROSA PARK APARTMEI	170706	1251 TURK ST	706 1
000978	ROSA PARK APARTMEI	170707	1251 TURK ST	707 0
000978	ROSA PARK APARTMEI	170111	1251 TURK ST	111 2
000978	ROSA PARK APARTMEI	170201	1251 TURK ST	201 1
000978	ROSA PARK APARTMEI	170202	1251 TURK ST	202 1
000978	ROSA PARK APARTMEI	170203	1251 TURK ST	203 1
000978	ROSA PARK APARTMEI	170204	1251 TURK ST	204 1
000978	ROSA PARK APARTMEI	170205	1251 TURK ST	205 1
000978	ROSA PARK APARTMEI	170206	1251 TURK ST	206 1
000978	ROSA PARK APARTMEI	170207	1251 TURK ST	207 0
000978	ROSA PARK APARTMEI	170208	1251 TURK ST	208 1
000978	ROSA PARK APARTMEI	170209	1251 TURK ST	209 2
000978	ROSA PARK APARTMEI	170210	1251 TURK ST	210 2
000978	ROSA PARK APARTMEI	170211	1251 TURK ST	211 1
000978	ROSA PARK APARTMEI	170212	1251 TURK ST	212 2
000978	ROSA PARK APARTMEI	170213	1251 TURK ST	213 2
000978	ROSA PARK APARTMEI	170214	1251 TURK ST	214 2
000978	ROSA PARK APARTMEI	170216	1251 TURK ST	216 0
000978	ROSA PARK APARTMEI	170217	1251 TURK ST	217 1
000978	ROSA PARK APARTMEI	170218	1251 TURK ST	218 2
000978	ROSA PARK APARTMEI	170219	1251 TURK ST	219 2
000978	ROSA PARK APARTMEI	170220	1251 TURK ST	220 1
000978	ROSA PARK APARTMEI	170301	1251 TURK ST	301 1
000978	ROSA PARK APARTMEI	170302	1251 TURK ST	302 1
000978	ROSA PARK APARTMEI	170303	1251 TURK ST	303 1
000978	ROSA PARK APARTMEI	170304	1251 TURK ST	304 1
000978	ROSA PARK APARTMEI	170305	1251 TURK ST	305 1
000978	ROSA PARK APARTMEI	170306	1251 TURK ST	306 1

Potential MOD Units AMPs 969-972-978

AMP	Development	Unit Num	Address		Bed size
000978	ROSA PARK APARTMEI	170307	1251 TURK ST	307	0
000978	ROSA PARK APARTMEI	170308	1251 TURK ST	308	1
000978	ROSA PARK APARTMEI	170309	1251 TURK ST	309	2
000978	ROSA PARK APARTMEI	170310	1251 TURK ST	310	2
000978	ROSA PARK APARTMEI	170311	1251 TURK ST	311	1
000978	ROSA PARK APARTMEI	170312	1251 TURK ST	312	2
000978	ROSA PARK APARTMEI	170313	1251 TURK ST	313	2
000978	ROSA PARK APARTMEI	170314	1251 TURK ST	314	2
000978	ROSA PARK APARTMEI	170315	1251 TURK ST	315	2
000978	ROSA PARK APARTMEI	170316	1251 TURK ST	316	0
000978	ROSA PARK APARTMEI	170317	1251 TURK ST	317	1
000978	ROSA PARK APARTMEI	170320	1251 TURK ST	320	1
000978	ROSA PARK APARTMEI	170401	1251 TURK ST	401	1
000978	ROSA PARK APARTMEI	170402	1251 TURK ST	402	1
000978	ROSA PARK APARTMEI	170403	1251 TURK ST	403	1
000978	ROSA PARK APARTMEI	170404	1251 TURK ST	404	1
000978	ROSA PARK APARTMEI	170405	1251 TURK ST	405	1
000978	ROSA PARK APARTMEI	170406	1251 TURK ST	406	1
000978	ROSA PARK APARTMEI	170407	1251 TURK ST	407	0
000978	ROSA PARK APARTMEI	170408	1251 TURK ST	408	1
000978	ROSA PARK APARTMEI	170409	1251 TURK ST	409	2
000978	ROSA PARK APARTMEI	170410	1251 TURK ST	410	2
000978	ROSA PARK APARTMEI	170411	1251 TURK ST	411	1
000978	ROSA PARK APARTMEI	170412	1251 TURK ST	412	2
000978	ROSA PARK APARTMEI	170413	1251 TURK ST	413	2
000978	ROSA PARK APARTMEI	170414	1251 TURK ST	414	2
000978	ROSA PARK APARTMEI	170415	1251 TURK ST	415	2
000978	ROSA PARK APARTMEI	170416	1251 TURK ST	416	0
000978	ROSA PARK APARTMEI	170417	1251 TURK ST	417	1
000978	ROSA PARK APARTMEI	170419	1251 TURK ST	419	2
000978	ROSA PARK APARTMEI	170420	1251 TURK ST	420	1
000978	ROSA PARK APARTMEI	170501	1251 TURK ST	501	1
000978	ROSA PARK APARTMEI	170502	1251 TURK ST	502	1
000978	ROSA PARK APARTMEI	170503	1251 TURK ST	503	1
000978	ROSA PARK APARTMEI	170504	1251 TURK ST	504	1
000978	ROSA PARK APARTMEI	170505	1251 TURK ST	505	1
000978	ROSA PARK APARTMEI	170506	1251 TURK ST	506	1
000978	ROSA PARK APARTMEI	170507	1251 TURK ST	507	0
000978	ROSA PARK APARTMEI	170508	1251 TURK ST	508	1
000978	ROSA PARK APARTMEI	170509	1251 TURK ST	509	2
000978	ROSA PARK APARTMEI	170510	1251 TURK ST	510	2
000978	ROSA PARK APARTMEI	170511	1251 TURK ST	511	1
000978	ROSA PARK APARTMEI	170512	1251 TURK ST	512	2
000978	ROSA PARK APARTMEI	170801	1251 TURK ST	801	1
000978	ROSA PARK APARTMEI	170802	1251 TURK ST	802	1
000978	ROSA PARK APARTMEI	170803	1251 TURK ST	803	1
000978	ROSA PARK APARTMEI	170804	1251 TURK ST	804	1
000978	ROSA PARK APARTMEI	170805	1251 TURK ST	805	1
000978	ROSA PARK APARTMEI	170806	1251 TURK ST	806	1
000978	ROSA PARK APARTMEI	170807	1251 TURK ST	807	0
000978	ROSA PARK APARTMEI	170808	1251 TURK ST	808	1
000978	ROSA PARK APARTMEI	170809	1251 TURK ST	809	2
000978	ROSA PARK APARTMEI	170810	1251 TURK ST	810	2
000978	ROSA PARK APARTMEI	170811	1251 TURK ST	811	1
000978	ROSA PARK APARTMEI	170812	1251 TURK ST	812	2
000978	ROSA PARK APARTMEI	170813	1251 TURK ST	813	2
000978	ROSA PARK APARTMEI	170814	1251 TURK ST	814	2
000978	ROSA PARK APARTMEI	170815	1251 TURK ST	815	2
000978	ROSA PARK APARTMEI	170816	1251 TURK ST	816	0
000978	ROSA PARK APARTMEI	170817	1251 TURK ST	817	1
000978	ROSA PARK APARTMEI	170818	1251 TURK ST	818	2
000978	ROSA PARK APARTMEI	170819	1251 TURK ST	819	2
000978	ROSA PARK APARTMEI	170820	1251 TURK ST	820	1

Potential MOD Units AMPs 969-972-978

AMP	Development	Unit Num	Address	Bed size
000978	ROSA PARK APARTMEI	170901	1251 TURK ST	901 1
000978	ROSA PARK APARTMEI	170902	1251 TURK ST	902 1
000978	ROSA PARK APARTMEI	170903	1251 TURK ST	903 1
000978	ROSA PARK APARTMEI	170904	1251 TURK ST	904 1
000978	ROSA PARK APARTMEI	170905	1251 TURK ST	905 1
000978	ROSA PARK APARTMEI	170906	1251 TURK ST	906 1
000978	ROSA PARK APARTMEI	170907	1251 TURK ST	907 0
000978	ROSA PARK APARTMEI	170908	1251 TURK ST	908 1
000978	ROSA PARK APARTMEI	170909	1251 TURK ST	909 2
000978	ROSA PARK APARTMEI	170910	1251 TURK ST	910 2
000978	ROSA PARK APARTMEI	170911	1251 TURK ST	911 1
000978	ROSA PARK APARTMEI	170912	1251 TURK ST	912 2
000978	ROSA PARK APARTMEI	170913	1251 TURK ST	913 2
000978	ROSA PARK APARTMEI	170914	1251 TURK ST	914 2
000978	ROSA PARK APARTMEI	170915	1251 TURK ST	915 2
000978	ROSA PARK APARTMEI	170916	1251 TURK ST	916 0
000978	ROSA PARK APARTMEI	170917	1251 TURK ST	917 1
000978	ROSA PARK APARTMEI	170918	1251 TURK ST	918 2
000978	ROSA PARK APARTMEI	170919	1251 TURK ST	919 2
000978	ROSA PARK APARTMEI	170920	1251 TURK ST	920 1
000978	ROSA PARK APARTMEI	171001	1251 TURK ST	1001 1
000978	ROSA PARK APARTMEI	171002	1251 TURK ST	1002 1
000978	ROSA PARK APARTMEI	171003	1251 TURK ST	1003 1
000978	ROSA PARK APARTMEI	171004	1251 TURK ST	1004 1
000978	ROSA PARK APARTMEI	171005	1251 TURK ST	1005 1
000978	ROSA PARK APARTMEI	171006	1251 TURK ST	1006 1
000978	ROSA PARK APARTMEI	171007	1251 TURK ST	1007 0
000978	ROSA PARK APARTMEI	171008	1251 TURK ST	1008 1
000978	ROSA PARK APARTMEI	171009	1251 TURK ST	1009 2
000978	ROSA PARK APARTMEI	171010	1251 TURK ST	1010 2
000978	ROSA PARK APARTMEI	171011	1251 TURK ST	1011 1
000978	ROSA PARK APARTMEI	171012	1251 TURK ST	1012 2
000978	ROSA PARK APARTMEI	171013	1251 TURK ST	1013 2
000978	ROSA PARK APARTMEI	171014	1251 TURK ST	1014 2
000978	ROSA PARK APARTMEI	171015	1251 TURK ST	1015 2
000978	ROSA PARK APARTMEI	171016	1251 TURK ST	1016 0
000978	ROSA PARK APARTMEI	171017	1251 TURK ST	1017 1
000978	ROSA PARK APARTMEI	171018	1251 TURK ST	1018 4
000978	ROSA PARK APARTMEI	171101	1251 TURK ST	1101 1
000978	ROSA PARK APARTMEI	171102	1251 TURK ST	1102 1
000978	ROSA PARK APARTMEI	171103	1251 TURK ST	1103 1
000978	ROSA PARK APARTMEI	171104	1251 TURK ST	1104 1
000978	ROSA PARK APARTMEI	171105	1251 TURK ST	1105 1
000978	ROSA PARK APARTMEI	171106	1251 TURK ST	1106 1
000978	ROSA PARK APARTMEI	171107	1251 TURK ST	1107 0
000978	ROSA PARK APARTMEI	171108	1251 TURK ST	1108 1
000978	ROSA PARK APARTMEI	171109	1251 TURK ST	1109 2
000978	ROSA PARK APARTMEI	171110	1251 TURK ST	1110 2
000978	ROSA PARK APARTMEI	171111	1251 TURK ST	1111 1
000978	ROSA PARK APARTMEI	171112	1251 TURK ST	1112 2
000978	ROSA PARK APARTMEI	171113	1251 TURK ST	1113 2
000978	ROSA PARK APARTMEI	171114	1251 TURK ST	1114 2
000978	ROSA PARK APARTMEI	171115	1251 TURK ST	1115 2
LEASED AND OCCUPIED				
000978	ROSA PARK APARTMEI	171116	1251 TURK ST	1116 0
000978	ROSA PARK APARTMEI	170513	1251 TURK ST	513 2
000978	ROSA PARK APARTMEI	170708	1251 TURK ST	708 1
000978	ROSA PARK APARTMEI	170720	1251 TURK ST	720 1
Vacancy Master				
000978	ROSA PARK APARTMEI	170318	1251 TURK ST	318 4
VACANT AVAILABLE				
195 PARK APARTMENTS				
000978	SAN JULES APTS	501357	1357 EDDY STREET	3

Potential MOD Units AMPs 969-972-978

AMP	Development	Unit Num	Address	Bed size
000978	SAN JULES APTS	501359	1359 EDDY STREET	3
000978	SAN JULES APTS	501361	1361 EDDY STREET	3
000978	SAN JULES APTS	501363	1363 EDDY STREET	3
000978	SAN JULES APTS	501365	1365 EDDY STREET	3
000978	SAN JULES APTS	501367	1367 EDDY STREET	3
000978	SAN JULES APTS	501369	1369 EDDY STREET	3
000978	SAN JULES APTS	501371	1371 EDDY STREET	3
		LEASED AND OCCUPIED		
		8 AN JULES APTS		
203		000978		