

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

PHA Plans

5 Year Plan for Fiscal Years 2000 - 2004
Annual Plan for Fiscal Year 2001

**PHA Plan
Agency Identification**

PHA Name: Columbus Metropolitan Housing Authority

PHA Number: OH001

PHA Fiscal Year Beginning: (mm/yyyy) 01/01/2001

Public Access to Information

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

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

Display Locations For PHA Plans and Supporting Documents

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

- Main administrative office of the PHA
- PHA development management offices
- PHA local offices
- Main administrative office of the local government
- Main administrative office of the County government
- Main administrative office of the State government
- Public library: Columbus Metropolitan Library, 96 S. Grant Ave. Columbus, OH 43215
- PHA website
- Other (list below): 1. Mid-Ohio Regional Planning Commission, 285 E. Main St., Col 43215
2. City of Columbus Dept. of Trade & Dev., 50 W. Gay St., 3rd Floor, Col. OH 43215

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

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

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

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

SEE PAGE 5 (PHA 5 YEAR PLAN FOR FISCAL YEARS 2000-2004)

A. Mission

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

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

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

B. Goals

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

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

_____ PHA Goal: Expand the supply of assisted housing

Objectives:

_____ Apply for additional rental vouchers:

_____ Reduce public housing vacancies:

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

_____ Acquire or build units or developments

_____ Other (list below)

_____ PHA Goal: Improve the quality of assisted housing

Objectives:

_____ Improve public housing management: (PHAS score)

_____ Improve voucher management: (SEMAP score)

_____ Increase customer satisfaction:

_____ Concentrate on efforts to improve specific management functions: (list;

- _____ e.g., public housing finance; voucher unit inspections)
- _____ Renovate or modernize public housing units:
- _____ Demolish or dispose of obsolete public housing:
- _____ Provide replacement public housing:
- _____ Provide replacement vouchers:
- _____ Other: (list below)

_____ PHA Goal: Increase assisted housing choices

Objectives:

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

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

_____ PHA Goal: Provide an improved living environment

Objectives:

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

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

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

Objectives:

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

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

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

Other PHA Goals and Objectives: (list below)

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

GOAL (1): Expand our community partnerships and leverage our resources to improve the quality of life for our housing customers				
OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES	OUTPUT
1. To improve the self-sufficiency of our housing residents by developing employment, training and educational opportunities with community-based partners	A. Develop a data bank of resident employment and educational skills	Jan. 1, 2000 thru Sept. 30, 2000	Number of residents in the data bank with the employment skills listed	< Ohio Works a WorkSource identified for use as data bank
	B. Make referrals from the data bank for employment	June 1, 2000 thru Ongoing	Number of placements	< PRCDR proposal has been approved for community based partners to provide training to unemployed and under employed residents
	C. Identify potential funding sources and community partners for employment placement	June 1, 2000 thru Ongoing	Number of partners and the amount of money received	< There are six (6) partners and CMHA has received 2.3 million for partners from FCDJFS

GOAL (1): Expand our community partnerships and leverage our resources to improve the quality of life for our housing customers				
OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES	OUTPUT
2. To increase access to academic and vocational opportunities for our housing residents through educational providers	A. Develop a resource directory of academic and vocational opportunities	Jan. 1, 2001 thru Dec. 2, 2001	The production of a resource directory	<ul style="list-style-type: none"> < Community newsletters regularly advertise: Job Openings, Job Fairs, Training Opportunities, etc. < Nine (9) resource guides each representing a specific geographic area of the county (First Link) contain a plethora of community services including employment and educational opportunities have been distributed to all communities < Ohio Works and Work Source directory will be used
	B. Meet with academic and vocational providers to develop economic incentives for our housing customers	Jan. 1, 2001 thru Ongoing	Number of active programs, participants and graduates	<ul style="list-style-type: none"> < PRC Proposal accomplishes task < IDA Collaboration with CMAAO provides economic incentives toward homeownership, education, or micro enterprise < Interested FSS participants are referred to OSU Access Program and the College of Business Liaison at DeVry Institute of Technology

GOAL (1): Expand our community partnerships and leverage our resources to improve the quality of life for our housing customers				
OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES	OUTPUT
3. To improve collaboration with cities in order to increase the delivery of services (ex. Police, trash removal) to our housing residents	A. CMHA meet with community residents & council to determine the level of City services offered within their communities	Jan. 1, 2000 thru Dec. 31, 2000	Inventory of services delivered and/or needed	< Sunshine Terrace, Annex and Riverside-Bradley have met with community police, Parks and Recreation to improve the three communities
	B. CMHA meet with City officials to discuss services provided to our residents and develop ways to increase the delivery of current & new services	Jan. 1, 2000 thru Dec. 31, 2001	Improvements in services and the delivery of services to our community residents	< Col. Division of Police - CMHA has hired Special Duty Officers from the Division; The Division has helped to identify areas within our communities with significant drug and criminal activity. We're noticing less traffic, and fewer gatherings in these areas. Special Divisions have worked with CMHA to conduct raids on suspected drug units, apprehension of dealers, arrest murder suspect(s) and wanted felons < Adult Parole Authority (APA) - working together, parole violators are being apprehended from our communities. APA provides CMHA with information on parole violators. < Attorney General's Office - provides CMHA with pertinent material on Domestic Violence, Consumer Fraud, Fire prevention etc. and CMHA distributes the info. to residents < Dept. of Public Safety - supported CMHA in obtaining Drug Elimination Grant and in encouraging the Div. of Police to increase patrols in areas of greatest need.

GOAL (1): Expand our community partnerships and leverage our resources to improve the quality of life for our housing customers				
OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES	OUTPUT
4. To increase customer satisfaction by improving the lines of communication with resident organizations and grass root community organizations	A. Attend Resident Council and grass root community organizations' meetings	Jan. 1, 2000 thru Dec. 31, 20004	Number of PICL, Senior Coalition and other Community meetings attended	< Senior staff members attend PICL, Senior Coalition and Community meetings
	B. Address community residents concerns within reasonable time frames (review or develop applicable procedures and time frames)	Jan. 1, 2000 thru Dec. 31, 20004	Journal of community residents' concerns, established time frames and actual amount of time it took CMHA to address those concerns. The amount of time to process work orders.	< As of May 2000, CMHA has addressed 28 resident/community concerns within a reasonable time frame < CMHA is in the process of hiring critical Maintenance & Crafts crews, written concerns distributed to all departments / staff in addressing resident concerns. Follow-up is conducted weekly at staff meeting
	C. Continue to publish community newsletters	Jan. 1, 2000 thru Dec. 31, 2004	Published newsletters	< Newsletters are published every-other month for Family and Senior Communities
	D. Develop survey of base line data using PHAS resident survey	Jan. 1, 2000 thru Dec. 31, 2001	Count and analyze survey results for baseline data	

GOAL (1): Expand our community partnerships and leverage our resources to improve the quality of life for our housing customers				
OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES	OUTPUT
<i>Continuation of #4</i>	E. Educate staff to customers and organizational diversity	Jan. 1, 2001 thru Dec. 31, 2002	Number of training classes. Reduction in the number of complaints received	< Diversity training scheduled for 135 staff in September 2000 on the Somalian Culture
	F. To meet with social services and non-profit organizations to improve the self-sufficiency of our housing customers	Jan. 1, 2000 thru Dec. 31, 2004	Number of residents participating in other self-sufficiency programs	< Resident Service staff attends job developer's meetings, regularly, regularly publishes job opening, training opportunities, educational opportunities, and job fairs in the newsletter < A monthly meeting of PRC Partners is being held starting July 1, 2000.

GOAL (1): Expand our community partnerships and leverage our resources to improve the quality of life for our housing customers

for our housing customers

OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES	OUTPUT
5. To improve the public's understanding of our mission to develop and provide access to affordable housing and supportive services	A. Actively make known to the news media CMHA's mission when the opportunity arises	Jan. 1, 2000 thru Dec. 31, 2004	Number of positive news stories	
	B. Improve the physical appearances of our communities	Jan. 1, 2000 thru Dec. 31, 2004	Landscaping with plants, no trash in communities and use of the PHAS physical measures	<ul style="list-style-type: none"> < Contract with outside sources to improve landscaping of 10 communities. < Developed a summer landscaping / maintenance program < Hiring custodial workers for grounds June 2000 < Working with Resident Council Groups
	C. Develop an Annual Report (included format and data needs)	Jan. 1, 2000 thru Dec. 31, 2004	Production of Annual Reports	<ul style="list-style-type: none"> < Annual Report is scheduled for September 2000 release

GOAL (2): Expand the supply of safe and affordable housing for people in need				
OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES	OUTPUT

1. To reduce homelessness by developing housing in partnership with other agencies. (Includes Section 8 vouchers and certificates)	A. Establish and maintain working relationships with the Community Shelter Board and its member agencies	Jan. 1, 2000 thru Ongoing	Number of Section 8 units set aside or dedicated to partner agencies. These agencies will be responsible for lease-up.	<	Relationship established with Open Shelter System Office on Aging to streamline processing
	B. Review and update current agreements on use of our public housing resources for homeless families	Mar. 31, 2000 thru Ongoing	Number of public housing units designated for use by partner agencies (e.g., permanent housing for homeless families that have successfully completed a transitional housing program).	<	RFP developed for Project based S8 to be released in the Fall of 2000

GOAL (2): Expand the supply of safe and affordable housing for people in need				
OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES	OUTPUT
<i>Continuation of #1</i>	C. Review admission and preference policies (Section 8 and Public Housing) and establish appropriate priorities	Jan. 1, 2000 thru Ongoing	The adoption and preparation of new Admissions & Preference policies	

2. To expand housing choices by providing rental and homeownership opportunities in low poverty area	A. Expand Homeownership Program	Jan. 1, 2000 thru Ongoing	An increase in the number of Section 8 and Public Housing units in low poverty areas	<	CMHA has entered into MOA with Ohio Capital Corporation of Housing & Greater Linden Development Corporation to develop homeownership program in South Linden area
	B. Identify low poverty areas and number of units (S8 and PH) currently in place	Jan. 1, 2000 thru Ongoing	The enrollment of participants in the Homeownership Program		
	C. Initiate Section 8 outreach program to landlords	Jan. 1, 2000 thru Ongoing	Number of new landlords and units		
	D. Review FMR's and see if they can be raised	Jan. 1, 2000 thru Ongoing			
	E. Establish Section 8 Homeownership Program	Jan. 1, 2000 thru Ongoing	Number of units developed for homeownership	<	CMHA issued an Elderly RFP
	F. Publish RFP for sites in low poverty area for PH elderly/Family units	Oct. 1, 1999 thru Ongoing		<	A developer was selected and construction will start in 2001

GOAL (2): Expand the supply of safe and affordable housing for people in need				
OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES	OUTPUT

3. To assist in the revitalization of designated neighborhoods (e.g. enterprise community, enterprise zone) through development of affordable housing opportunities	A. Continue working with South Linden Neighborhood (GLDC, Area Commission, etc.)	Jan. 1, 2000 thru Ongoing	Number of units developed for homeownership	<	CMHA has signed MOA with Ohio Capital Corporation of Housing & Greater Linden Development Corporation to construct 7-10 homeownership units in South Linden
	B. Establish collaborative for revitalization of Linton Gardens and the surrounding area	Jan. 1, 2000 thru Ongoing	Number of homeownership units developed	<	Project will be ongoing for an additional 2-3 years
	C. Establish collaborative for revitalization of Taylor Terrace	Jan. 1, 2000 thru June 30, 2001	The development of 100 units of mixed-income housing at Taylor Terrace	<	Architect has been selected. Construction will start in 2001 and be completed in 2002
	D. Establish Homeownership Program in the Enterprise Community	Jan. 1, 2000 thru Ongoing	The number of participants enrolled in the Homeownership Program in the Enterprise Community	<	No activity
	E. Establish partnership with CHN for the development of scattered sites for the disabled	Jan. 1, 2000 thru Ongoing	Develop 80-100 units of housing for the disabled in partnership with CHN	<	CMHA is still talking with CHN

GOAL (2): Expand the supply of safe and affordable housing for people in need				
OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES	OUTPUT

4. To expand housing units by leveraging funding opportunities	A. Develop partnerships with other agencies to secure grant funding and other types of financial commitments	Jan. 1, 2000 thru Ongoing	Increase in the number of participants providing grants and other financial commitments	
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GOAL (3): Improve Customer Service by being More Supportive of Our Customer's Needs				
OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES	OUTPUT
1. To provide quality maintenance services to residents	A. Assess existing quality and timeliness of maintenance of occupied units and initial occupancy units	Jan. 1, 2000 thru Ongoing	Timeliness in processing work orders, lower vacancy rate, higher resident satisfaction on PHAS survey	<ul style="list-style-type: none"> < Provide information to residents on service response time for work orders < Maintenance teams created to focus on work orders for occupied units < Plan to address customer service needs has been submitted

GOAL (3): Improve Customer Service by being More Supportive of Our Customer's Needs				
OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES	OUTPUT

<i>Continuation of #1</i>	B. Meet with staff to develop performance standards	May 1, 2000 thru Dec. 30, 2000	Performance standards developed, implemented and monitored	< The Director of Property Manager has met with his Asst. Directors and informed them that they will need to meet with their staff people to implement performance standards and use them as a monitoring tool < In process
2. To create better information about CMHA's affordable housing opportunities for prospective tenants	A. Identify potential customers of CMHA housing services	July 1, 2000 thru Sept. 30, 2000	Number of customers identified	
	B. Assess existing policies through meeting and focus groups	Oct. 1, 2000 thru Dec. 31, 2000	Number of meetings and number of policies improved	
	C. Develop a marketing strategy to attract higher income residents	June 1, 2000 thru Dec. 31, 2000	Market plan implemented	

GOAL (3): Improve Customer Service by being More Supportive of Our Customer's Needs				
OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES	OUTPUT

3. To improve our customers' understanding of our leasing and program policies	A. Meet with tenants and Section 8 assisted families to obtain comments about program rules and policies	Oct. 1, 2000 thru Mar. 31, 2001	Reduced number of grievances, improved educational literature	< < <	Requested and received additional staff for hearings Need count/comparison on number of grievances from May 98-99 and May 99-2000 Developed pamphlet for several communities
	B. Meet with employees to obtain input about Low Rent and Section 8 program rules and policies	April 1, 2001 thru June 30, 2001	Number of reduced grievances	< <	Working with staff on reducing grievances Still in the planning stages for low rent
	C. Retain and/or develop new program information in easy to understand language	July 1, 2001 thru Dec. 31, 2002	Number of publications, improved lease up in both conventional and S8 programs	< <	Conducted one on one training with clerks for consistency on program discrimination Mailed notification letters to residents & applicants regarding policy changes Revised RTS forms (tables interview format)
4. To create a positive and dynamic work environment which fosters a "we can do it" attitude among our employees	A. Emphasize the recruitment of competent, professional, and people-oriented staff	Jan. 1, 2000 thru Ongoing	Skill level of new hire		
	B. Establish a value system that recognizes and rewards team member's contributions to CMHA's goals and mission	Mar. 1, 2000 thru Sept. 30, 2000	A system in place		

GOAL (3): Improve Customer Service by being More Supportive of Our Customer's Needs				
OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES	OUTPUT

<i>Continuation of #4</i>	C. Expand CMHA’s professional development and technical training programs in order to retain and promote competent and professional team members	Jan. 1, 2000 thru Dec. 31, 2000	Number of training classes and enrolles	<	Managers attended various Management Advancement Programs at The Ohio State University < A Core Curriculum was developed for managers
	D. Improve our monitoring and assessment of our progress toward achieving CMHA’s mission	Jan. 1, 2000 thru Ongoing	Assessment reports in place to monitor progress	<	In progress

GOAL (4): Maintain an Effective, Efficient and Fiscally Accountable Operation					
OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES		OUTPUT
1. To expand funding sources and revenues	A. Aggressively pursue the identification of and acquisition of potential funding sources for CMHA and/or it’s community partners to provide necessary direct or supportive housing programs and services	Jan. 1, 2000 thru Ongoing	Number of programs available to residents, number of new sources and amount of dollars	<	In process of developing a collaborative with the YMCA for supportive housing at Sunshine Terrace
	B. Advertise and promote programs and activities available through and/or at CMHA communities	Jan. 1, 2000 thru Ongoing	Number of programs & pamphlets distributed		
	C. Continually monitor and modify investment planning opportunities to maximize revenue growth potential	Jan. 1, 2000 thru Ongoing	Additional income to CMHA and fund reserves		

GOAL (4): Maintain an Effective, Efficient and Fiscally Accountable Operation					
OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES		OUTPUT

<i>Continuation of #1</i>	D. Leverage funds with community partners to increase the community's investment in program/service development	Jan. 1, 2000 thru Ongoing	Number of development ventures within the community	< working with and meeting with attorneys in reducing time frames for processing court cases (we've had two meetings to date)
	E. Pursue innovative approaches to debt collection	Jan. 1, 2000 thru Ongoing	Reduction in Tenant Accounts Receivables Report	< on-site management is working on improving rent collection process for TARS
2. Improved decision support	A. Continually assess, evaluate and modify CMHA operations as needed, to ensure timely, effective and efficient service in compliance with HUD and community requirements	Jan. 1, 2000 thru Ongoing	Reduced time lines for delivery of products and services Continuous improvement on PHAS and SEMAP evaluations	
	B. Develop information systems to facilitate data gathering and dissemination to aid in the planning, evaluation, forecasting and decision making	Jan. 1, 2000 thru Ongoing	SEMAP, PHAS and other audit findings	
3. Informed and involved staff, clients and landlords	A. Provide mechanism for input from staff, residents, community organizations and interest groups, and landlords into the decision process to enhance agency operations	Jan. 1, 2000 thru Ongoing	Level of response and results of customer satisfaction surveys	

GOAL (4): Maintain an Effective, Efficient and Fiscally Accountable Operation				
OUTCOMES	ACTION STEPS	TIME FRAMES	MEASURES	OUTPUT

<i>Continuation of #3</i>	B. Develop and implement a marketing campaign to promote CMHA programs, services and activities to landlords, clients, staff and the general public	Jan. 1, 2000 thru Ongoing	Results of PHAS, SEMAP and other audit reports reflecting compliance with HUD policies and guidelines	
	C. Coordinate the provision of training to staff on program policies, operations and customer service (landlord and client)	Jan. 1, 2000 thru Ongoing	Community, Customer, landlord and staff participation in CMHA sponsored events and activities	
	D. December 3, 1999 - Develop automated supports to track and manage customers requests for service, catalog waiting status, etc. and implement tools to handle general information	Jan. 1, 2000 thru Ongoing	New or expanded systems installed	

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

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

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

Annual PHA Plan

PHA Fiscal Year 2001

[24 CFR Part 903.7]

Annual Plan Type:

Select which type of Annual Plan the PHA will submit.

Standard Plan

Streamlined Plan:

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

Troubled Agency Plan

Executive Summary of the Annual PHA Plan

[24 CFR Part 903.7 9 (r)]

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

The Columbus Metropolitan Housing Authority has prepared this Agency Plan in compliance with Section 511 of the Quality Housing and Work Responsibility Act of 1998. While completing the Plan, the environment continues to shift on us. The continual evolution of the rules, as well as the uncertainty of our funding, forces us to reevaluate monthly any previous developed plans. The lack of funding from HUD jeopardizes even our basic housing services of the past.

Our mission and goals have not changed. CMHA will continue to provide access to affordable housing and supportive services for families and individuals in collaboration with community partners. The following goals will help us to accomplish our mission.

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

We have been monitoring each of our outcomes based upon its established time frame and measures to make sure that the goals are being accomplished.

Our Annual Plan is based on the premise that if we accomplish our five year goals and objectives

we will be working towards the achievement of our mission. The materials set forth in the Annual Plan all lead toward the accomplishment of our goals and objectives. Taken as a whole, they outline a comprehensive approach towards our goals and objectives and are consistent with the Consolidated Plan. Here are just a few of the highlights of our Annual Plan:

- # The construction of Gender Road Project was completed in the Fall of 2000 and occupancy will be complete by Mid-December
- # We will test a Site Based Waiting List in the Meadows, Poindexter Village and Post Oak to support customer service, deconcentration and mixed income
- # We have adopted flat rents for all our developments based on FMR for the community
- # We are currently working with public/private organizations to redevelop Linton Gardens into a mixed income community
- # We are continuing to support a minimum rent of \$50 to endorse tenant responsibility
- # We moved all tenants from Taylor Terrace and plan to demolish the building in preparation for a mixed income development
- # Deconcentration efforts have been adopted in S8 with rents set at 110% of FMR and exception rents between 110% and 120% of FMR
- # A goal of 50% under and 50% more than 30% of AMI has been adopted for Public Housing
- # Up to \$25,000 matching funds have been committed for development of a senior housing needs' assessment
- # A new central office building has been built in the Four Corners project area as part of redevelopment and will help to improve customer service
- # A Homeownership program will be started to support the Four Corners redevelopment

In summary, we are on course to improve the condition of affordable housing in the Columbus Metropolitan Housing Authority and U.S. Department of Housing and Urban Development Office of Public and Indian Housing.

Annual Plan Table of Contents

[24 CFR Part 903.7 9 (r)]

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

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Attachments

Indicate which attachments are provided by selecting all that apply. Provide the attachment's name (A, B, etc.) in the space to the left of the name of the attachment. Note: If the attachment is provided as a **SEPARATE** file submission from the PHA Plans file, provide the file name in parentheses in the space to the right of the title.

Required Attachments:

- A Admissions Policy for Deconcentration, see page 5 of the Admission & Occupancy Policy
- B FY 2001 Capital Fund Program Annual Statement
- Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)

Optional Attachments:

- C PHA Management Organizational Chart
- D FY 2001 Capital Fund Program 5 Year Action Plan

E Public Housing Drug Elimination Program (PHDEP) Plan

 F Comments of Resident Advisory Board or Boards (must be attached if not included in PHA Plan text)

 X Other (List below, providing each attachment name)

Attachment G - Social Service Programs by Community

Attachment H - Section 8 Administrative Plan

Attachment I - Pest Control Policy

Attachment J - Continued Occupancy and Community Service

Supporting Documents Available for Review

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

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
X	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations	5 Year and Annual Plans
X	State/Local Government Certification of Consistency with the Consolidated Plan	5 Year and Annual Plans
	Fair Housing Documentation: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions' initiatives to affirmatively further fair housing that require the PHA's involvement.	5 Year and Annual Plans
	Consolidated Plan for the jurisdiction/s in which the PHA is located (which includes the Analysis of Impediments to Fair Housing Choice (AI)) and any additional backup data to support statement of housing needs in the jurisdiction	Annual Plan: Housing Needs
X	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources;
X	Public Housing Admissions and (Continued) Occupancy Policy (A&O), which includes the Tenant Selection and Assignment Plan [TSAP]	Annual Plan: Eligibility, Selection, and Admissions Policies

Applicable & On Display	Supporting Document	Applicable Plan Component
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public Housing Deconcentration and Income Mixing Documentation: PHA board certifications of compliance with deconcentration requirements (section 16(a) of the US Housing Act of 1937, as implemented in the 2/18/99 <i>Quality Housing and Work Responsibility Act Initial Guidance; Notice</i> and any further HUD guidance) and 18. Documentation of the required deconcentration and income mixing analysis	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public housing rent determination policies, including the methodology for setting public housing flat rents T check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Schedule of flat rents offered at each public housing development T check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies T check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
X	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation)	Annual Plan: Operations and Maintenance
X	Public housing grievance procedures T check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
X	Section 8 informal review and hearing procedures T check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
X	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant year	Annual Plan: Capital Needs
	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant	Annual Plan: Capital Needs
	Most recent, approved 5 Year Action Plan for the Capital Fund/Comprehensive Grant Program, if not included as an attachment (provided at PHA option)	Annual Plan: Capital Needs
	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans or any other approved proposal for development of public housing	Annual Plan: Capital Needs
X	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition

Applicable & On Display	Supporting Document	Applicable Plan Component
	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing
	Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act	Annual Plan: Conversion of Public Housing
X	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership
	Policies governing any Section 8 Homeownership program check here if included in the Section 8 Administrative Plan	Annual Plan: Homeownership
	Any cooperative agreement between the PHA and the TANF agency	Annual Plan: Community Service & Self-Sufficiency
X	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports	Annual Plan: Community Service & Self-Sufficiency
X	The most recent Public Housing Drug Elimination Program (PHDEP) semi-annual performance report for any open grant and most recently submitted PHDEP application (PHDEP Plan)	Annual Plan: Safety and Crime Prevention
X	The most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h)), the results of that audit and the PHA's response to any findings	Annual Plan: Annual Audit
	Troubled PHAs: MOA/Recovery Plan	Troubled PHAs
X	Other supporting documents (optional) (list individually; use as many lines as necessary)	(specify as needed)

1. Statement of Housing Needs

[24 CFR Part 903.7 9 (a)]

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

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

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

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

- T There is a 22,000 unit total deficit for extremely low-income households in the study area.
- T The surplus/deficit analysis shows one affordable rental housing unit for every two extremely low-income renters in the study area.
- T The Section 8 Wait list as of June 2000 has 83% of its applicants at or below 30% of median income.
- T The Public Housing Wait list as of June 2000 has 86% of its applicants at or below 30% of median income.

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

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

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

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

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

- , Strategy 1: Establish a regional Implementing Body
- , Strategy 2: Create a Community Affordable Housing Fund
- , Strategy 3: Develop Customized Approaches for Each Local Community

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

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

CMHA will continue, during CY 2001, to bring on line and develop housing that will meet the strategies listed above. Specific projects that will see fruition will be the beginning of the Linden Homeownership Program to meet Strategy 3, the research and possible development of a plan for sale of the scattered site homes to current resident to meet Strategy 3 & 5, the development of a partnership in senior mixed income development to meet strategy 5, the beginning demolition and rebuilding of Taylor Terrace to meet Strategy 4 and the implementation of 800 Section 8 vouchers to meet Strategy 5.

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

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

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Affordability	Supply	Quality	Accessibility	Size	Location
Income <= 30% of AMI	46,156	5	5	2	4	3	4
Income >30% but <=50% of AMI	33,271	4	5	2	4	2	3

Family Type	Overall	Affordability	Supply	Quality	Accessibility	Size	Location
Income >50% but <80% of AMI	47,674	2	1	1	4	2	2
Elderly	20,681	4	3	2	4	1	2
Families with Disabilities	N/A						
Race/Ethnicity	N/A						
Race/Ethnicity	N/A						
Race/Ethnicity	N/A						
Race/Ethnicity	N/A						

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

- Consolidated Plan of the Jurisdiction/s
 Indicate year: 2000-2003 Appendix A-1
- U.S. Census data: the Comprehensive Housing Affordability Strategy (“CHAS”) dataset
- American Housing Survey data
 Indicate year: _____
- Other housing market study
 Indicate year: _____
- Other sources: (list and indicate year of information)

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

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

Housing Needs of Families on the Waiting List June 2000
Waiting list type: (select one) <input checked="" type="checkbox"/> Section 8 tenant-based assistance <input type="checkbox"/> Public Housing <input type="checkbox"/> Combined Section 8 and Public Housing <input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/subjurisdiction:

	# of families	% of total families	Annual Turnover
Waiting list total	3036		
Extremely low income <=30% AMI	2522	83.1	
Very low income (>30% but <=50% AMI)	450	14.8	
Low income (>50% but <80% AMI)	64	2.1	
Families with children			
Elderly families			
Families with Disabilities	697	23	
Race/ethnicity- white	575	18.9	
Race/ethnicity-Black	2377	78.3	
Race/ethnicity- American Indian	9	0.3	
Race/ethnicity- Hispanic	24	0.8	
Other	51	1.7	
Characteristics by Bedroom Size (Public Housing Only)			
1BR			
2 BR			
3 BR			
4 BR			
5 BR			
5+ BR			

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

If yes:

B. How long has it been closed (# of months)? August 1999

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

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

**Housing Needs of Families on the Waiting List
June 2000**

Waiting list type: (select one)

Section 8 tenant-based assistance

Public Housing

Combined Section 8 and Public Housing

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

If used, identify which development/subjurisdiction:

	# of families	% of total families	Annual Turnover
Waiting list total	2128		
Extremely low income <=30% AMI	1838	86.4	
Very low income (>30% but <=50% AMI)	261	12.3	
Low income (>50% but <80% AMI)	29	1.4	
Families with children	1794	84.3	
Elderly families	334	15.7	
Families with Disabilities	312	14.7	
Race/ethnicity- White	383	18	
Race/ethnicity- Black	1655	77.8	
Race/ethnicity- American Indian	10	0.5	

Race/ethnicity- Hispanic	20	0.9	
Other	60	2.8	
Characteristics by Bedroom Size (Public Housing Only)			
0BR	6	0.3	
1BR	627	29.5	
2 BR	745	35	
3 BR	534	25.1	
4 BR	150	7.1	
5 BR	23	1.1	
5+ BR+ Other	43	2	
Is the waiting list closed (select one)? <u>No</u> Yes			
If yes:			
B. How long has it been closed (# of months)?			
Does the PHA expect to reopen the list in the PHA Plan year? No Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? No Yes			

C. Strategy for Addressing Needs

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

(1) Strategies

Need: Shortage of affordable housing for all eligible populations

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

Select all that apply

- Employ effective maintenance and management policies to minimize the number of public housing units off-line
- Reduce turnover time for vacated public housing units
- Reduce time to renovate public housing units
- Seek replacement of public housing units lost to the inventory through mixed finance development
- Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources
- Maintain or increase section 8 lease-up rates by establishing payment standards that will

- enable families to rent throughout the jurisdiction
- Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required
- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies
- Other (list below)

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

Select all that apply

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

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

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

Select all that apply

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

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

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

Select all that apply

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

B. Need: Specific Family Types: The Elderly

Strategy 1: Target available assistance to the elderly:

Select all that apply

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

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

Select all that apply

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

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

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

Select if applicable

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

Strategy 2: Conduct activities to affirmatively further fair housing

Select all that apply

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

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

(2) Reasons for Selecting Strategies

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

- Funding constraints
- Staffing constraints

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

Statement of Financial Resources

[24 CFR Part 903.7 9

List the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant-based Section 8 assistance programs administered by the PHA during the Plan year.

Note: the table assumes that Federal public housing or tenant based Section 8 assistance grant funds are expended on eligible purposes; therefore, uses of these funds need not be stated. For other funds, indicate the use for those funds as one of the following categories: public housing operations, public housing capital improvements, public housing safety/security, public housing supportive services, Section 8 tenant-based assistance, Section 8 supportive services or other.)]

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2001 grants)		
a) Public Housing Operating Fund	\$7,584,704	
b) Public Housing Capital Fund	\$8,000,000	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	\$49,529,145	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)	\$500,000	
g) Resident Opportunity and Self- Sufficiency Grants	\$75,000	

Sources	Planned \$	Planned Uses
h) Community Development Block Grant		
i) HOME		
Other Federal Grants (list below)		
2. Prior Year Federal Grants (unobligated funds only) (list below)		
Hope VI Revitalization	\$1,500,000	Housing for homeless disabled
Public Housing Capital Fund	\$5,753,000	
3. Public Housing Dwelling Rental Income	\$5,939,550	PH Operations
4. Other income (list below)		
Interest Income	\$390,000	PH Operations
Non-dwelling Income	\$64,400	PH Operations
4. Non-federal sources (list below)		
Other-Franklin County Grant	\$1,150,000	PH Employment Training
Withdrawal of excess Section 8 Reserves	\$250,000	S8 Operations
Total resources	\$80,735,799	

3. PHA Policies Governing Eligibility, Selection, and Admissions

[24 CFR Part 903.7 9 (c)]

A. Public Housing

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

(1) Eligibility

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

When families are within a certain number of being offered a unit: (state number) If on wait-list, we screen at approximately 200 number

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

Other: (describe)

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

Criminal or Drug-related activity

Rental history

Housekeeping

Other (describe): financial credit history

c. Yes No: Does the PHA request criminal records from local law enforcement

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

(2)Waiting List Organization

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

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

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

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

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

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

Three (3): The Meadows, Poindexter and Post Oaks

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

If yes, how many lists? All three (3)

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

If yes, how many lists? two (2)

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

- PHA main administrative office
 All PHA development management offices
 Management offices at developments with site-based waiting lists

- At the development to which they would like to apply
 Other (list below)

(3) Assignment

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

- One
 Two
 Three or More

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

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

(4) Admissions Preferences

a. Income targeting:

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

50% at or below 30% of median area income

b. Transfer policies:

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

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

504 over new Admissions

a. Preferences

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

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

Former Federal preferences:

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

Other preferences: (select below)

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

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

1 Date and Time

Former Federal preferences:

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

Other preferences (select all that apply)

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

Disabled individuals with supportive services

4. Relationship of preferences to income targeting requirements:

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

(5) Occupancy

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

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

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

- At an annual reexamination and lease renewal
- Any time family composition changes
- At family request for revision
- Other (list) **when family income increases by more than \$1000 per year**

(6) Deconcentration and Income Mixing

a. Yes No: Did the PHA's analysis of its family (general occupancy)

developments to determine concentrations of poverty indicate the need for measures to promote deconcentration of poverty or income mixing?

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

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

Adoption of site-based waiting lists

If selected, list targeted developments below:

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

If selected, list targeted developments below:

All developments based on data tracking reports

Employing new admission preferences at targeted developments

If selected, list targeted developments below:

Other (list policies and developments targeted below)

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

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

Additional affirmative marketing

Actions to improve the marketability of certain developments

Adoption or adjustment of ceiling rents for certain developments

Adoption of rent incentives to encourage deconcentration of poverty and income-mixing

Other (list below) Adopted flat rent

f. Based on the results of the required analysis, in which developments will the PHA make

special efforts to attract or retain higher-income families? (select all that apply)
 Not applicable: results of analysis did not indicate a need for such efforts
 List (any applicable) developments below:

g. Based on the results of the required analysis, in which developments will the PHA make special efforts to assure access for lower-income families? (select all that apply)
 Not applicable: results of analysis did not indicate a need for such efforts
 List (any applicable) developments below:

B. Section 8

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

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

(1) Eligibility

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

(2) Waiting List Organization

- a. With which of the following program waiting lists is the section 8 tenant-based assistance waiting list merged? (select all that apply)
 None
 Federal public housing
 Federal moderate rehabilitation
 Federal project-based certificate program

____ Other federal or local program (list below)

b. Where may interested persons apply for admission to section 8 tenant-based assistance?
(select all that apply)

PHA main administrative office

____ Other (list below)

(3) Search Time

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

If yes, state circumstances below:

1. Can't locate unit within 60 days
2. Medical Reason
3. Any other reasonable request
(If we must close application or reduce the number of vouchers under lease there is no extension)

(4) Admissions Preferences

a. Income targeting

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

b. Preferences

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

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

Former Federal preferences

Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)

____ Victims of domestic violence

____ Substandard housing

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

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans' families
- Residents who live and/or work in your jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below): **Those not in subsidized housing currently and Executive Director's decision**

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

Date and Time

Former Federal preferences

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

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans' families
- Residents who live and/or work in your jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs
- Households that contribute to meeting income goals (broad range of incomes)
- Households that contribute to meeting income requirements (targeting)
- Those previously enrolled in educational, training, or upward mobility programs
- Victims of reprisals or hate crimes
- Other preference(s) (list below): **Those not in subsidized housing and**

Executive Director's decision

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

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

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

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

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

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

(5) Special Purpose Section 8 Assistance Programs

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

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

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

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

4. PHA Rent Determination Policies

[24 CFR Part 903.79(d)]

A. Public Housing

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

(1) Income Based Rent Policies

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

a. Use of discretionary policies: (select one)

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

---or---

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

b. Minimum Rent

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

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

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

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

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

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

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

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

- For the earned income of a previously unemployed household member
 For increases in earned income
 Fixed amount (other than general rent-setting policy)

If yes, state amount/s and circumstances below:

_____ Fixed percentage (other than general rent-setting policy)

If yes, state percentage/s and circumstances below:

_____ For household heads

_____ For other family members

_____ For transportation expenses

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

_____ Other (describe below)

e. Ceiling rents

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

_____ Yes for all developments

_____ Yes but only for some developments

X No

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

_____ For all developments

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

_____ For specified general occupancy developments

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

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

_____ Other (list below)

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

_____ Market comparability study

_____ Fair market rents (FMR)

_____ 95th percentile rents

_____ 75 percent of operating costs

_____ 100 percent of operating costs for general occupancy (family) developments

_____ Operating costs plus debt service

_____ The "rental value" of the unit

_____ Other (list below)

f. Rent re-determinations:

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

_____ Never

At family option

_____ Any time the family experiences an income increase

Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold) **\$1,000 / year more income**

_____ Other (list below)

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

(2) Flat Rents

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

The section 8 rent reasonableness study of comparable housing

_____ Survey of rents listed in local newspaper

_____ Survey of similar unassisted units in the neighborhood

_____ Other (list/describe below)

B. Section 8 Tenant-Based Assistance

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

(1) Payment Standards

Describe the voucher payment standards and policies.

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

_____ At or above 90% but below 100% of FMR

_____ 100% of FMR

Above 100% but at or below 110% of FMR

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

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

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

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

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

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

- Annually
- Other (list below)

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

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

(2) Minimum Rent

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

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

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

5. Operations and Management

[24 CFR Part 903.79 (e)]

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

A. PHA Management Structure

Describe the PHA's management structure and organization.

(select one)

An organization chart showing the PHA's management structure and organization is attached.

See Attachment C

A brief description of the management structure and organization of the PHA follows:

B. HUD Programs Under PHA Management

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

Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	3834	850
Section 8 Vouchers	6632	663
Section 8 Mod Rehab	147	15
Vouchers for Disabled	275588	2888
Shelter Care		
Public Housing Drug Elimination Program (PHDEP)	1866	373
Other Federal Programs(list individually)		

C. Management and Maintenance Policies

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

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

- Admission & Occupancy Policy is available at 880 E. 11th Avenue, Columbus, OH 43211
- Property Management Maintenance Policy is available at 880 E. 11th Avenue, Columbus, OH 43211
- Pest Control Policy **SEE ATTACHMENT I**
- Personnel Policy is available at 880 E. 11th Avenue, Columbus, OH 43211

(2) Section 8 Management: (list below)

- Administrative Plan **SEE ATTACHMENT H**
- Personnel Policy is available at 880 E. 11th Avenue, Columbus, OH 43211

6. PHA Grievance Procedures

[24 CFR Part 903.7 9 (f)]

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

A. Public Housing

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

If yes, list additions to federal requirements below:

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

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

B. Section 8 Tenant-Based Assistance

1. Yes No: Has the PHA established informal review procedures for applicants to the Section 8 tenant-based assistance program and informal hearing procedures for families assisted by the Section 8 tenant-based assistance program in addition to federal requirements found at 24 CFR 982?

If yes, list additions to federal requirements below:

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

- PHA main administrative office
- Other (list below)

7. Capital Improvement Needs

[24 CFR Part 903.7 9 (g)]

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

A. Capital Fund Activities

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

(1) Capital Fund Program Annual Statement

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

Select one:

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

-or-

SEE ATTACHMENT D

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

(2) Optional 5-Year Action Plan

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

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

b. If yes to question a, select one:

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

-or-

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

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

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

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

1. Development name: **Roseswind, The Meadows and additional off-sites**

2. Development (project) number: **OH16URD001I194**

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

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

- Yes No: c) Does the PHA plan to apply for a HOPE VI Revitalization grant in the Plan year?
If yes, list development name/s below:

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

1. Taylor Terrace - new construction
2. Undesignated Site - family/elderly housing

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

* **Start construction on the Taylor Terrace site**

* **Start construction for the development of additional**

elderly housing

* **Planning for the development of additional housing for the mentally disabled**

* **Developing a homeownership program to support the Rosewind HOPE VI urban revitalization area**

8. Demolition and Disposition

[24 CFR Part 903.7 9 (h)]

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

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

2. Activity Description

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

Demolition/Disposition Activity Description	
1a. Development name:	Taylor Terrace
1b. Development (project) number:	
2. Activity type:	<input checked="" type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition To CMHA subsidiary
3. Application status (select one)	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date application approved, submitted, or planned for submission:	<u>(28/07/99)</u>
5. Number of units affected:	261
Coverage of action (select one)	<input type="checkbox"/> Part of the development <input checked="" type="checkbox"/> Total development
7. Timeline for activity:	
a. Actual or projected start date of activity:	<u>02/01/00</u>
b. Projected end date of activity:	<u>03/12/01</u>

Demolition/Disposition Activity Description	
1a. Development name:	Scattered Sites
1b. Development (project) number:	New Group
2. Activity type:	<input checked="" type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition
3. Application status (select one)	<input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date application approved, submitted, or planned for submission:	<u>(12/08/99)</u>
5. Number of units affected:	<u>50-200</u>
Coverage of action (select one)	<input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity:	
a. Actual or projected start date of activity:	<u>03/01/00</u>
b. Projected end date of activity:	<u>03/01/03</u>

Demolition/Disposition Activity Description	
1a. Development name:	Linton Gardens
1b. Development (project) number:	
2. Activity type:	<input type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition disposition of vacant land
3. Application status (select one)	<input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date application approved, submitted, or planned for submission:	<u>(06/30/01)</u>
5. Number of units affected:	<u>N/A</u>
Coverage of action (select one)	<input type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity:	
a. Actual or projected start date of activity:	<u>03/30/01</u>
b. Projected end date of activity:	<u>09/30/01</u>

Demolition/Disposition Activity Description	
1a. Development name:	Old Central Office Building 960 East Fifth Ave. Col. OH 43201
1b. Development (project) number:	
2. Activity type:	<input checked="" type="checkbox"/> Demolition <input checked="" type="checkbox"/> Disposition
3. Application status (select one)	<input type="checkbox"/> Approved <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date application approved, submitted, or planned for submission:	(06/30/01)
5. Number of units affected:	N/A
Coverage of action (select one)	<input type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity:	a. Actual or projected start date of activity: 03/30/01 b. Projected end date of activity: 09/30/01

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

[24 CFR Part 903.79 (i)]

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

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

2. Activity Description

Yes No

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

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

10. Conversion of Public Housing to Tenant-Based Assistance

[24 CFR Part 903.79 (j)]

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

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

1. Yes No: Have any of the PHA's developments or portions of developments been identified by HUD or the PHA as covered under section 202 of the HUD

FY 1996 HUD Appropriations Act? (If “No”, skip to component 11; if “yes”, complete one

activity description for each identified development, unless eligible to complete a streamlined submission. PHAs completing streamlined submissions may skip to component 11.)

2. Activity Description

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

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

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

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

11. Homeownership Programs Administered by the PHA

[24 CFR Part 903.79 (k)]

A. Public Housing

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

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

2. Activity Description

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

**Public Housing Homeownership Activity Description
(Complete one for each development affected)**

1a. Development name:

1b. Development (project) number:

Trevitt Heights	1-11
Brittany Hills	1-17
Brittany Hills	1-22
Scattered Sites	1-23
Scattered Sites	1-18
Alice Rita	1-24
Brittany Hills	1-25
Glencreek/Crestwood	1-26
Russell Leach	1-27

2. Federal Program authority:

HOPE I

HOPE III

Size of Program: All eleven (11) homes were sold.

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

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

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

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

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

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

LINTON GARDENS / SOUTH LINDEN - Thirty-Five (35) units are currently being built

5(h)

Turnkey III

Size of Program: The Columbus Metropolitan Housing Authority is in the process of finalizing this program which started in 1971 with 948 units. 809 units have been purchased and 137 units were converted to our conventional public housing. The remaining two units will be sold probable by the time this Plan is put into effect in CY 2001.

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

3. Application status: (select one)

Approved; included in the PHA's Homeownership Plan/Program

Submitted, pending approval

Planned application

4. Date Homeownership Plan/Program approved, submitted, or planned for submission:

October 2001

5. Number of units affected:

6. Coverage of action: (select one)

Part of the development

Total development

B. Section 8 Tenant Based Assistance

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

2. Program Description:

a. Size of Program

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

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

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

b. PHA-established eligibility criteria

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

12. PHA Community Service and Self-sufficiency Programs

[24 CFR Part 903.79 (l)]

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

SEE ATTACHMENT G

A. PHA Coordination with the Welfare (TANF) Agency

1. Cooperative agreements:

Yes No: Has the PHA entered into a cooperative agreement with the TANF Agency, to share information and/or target supportive services (as contemplated by section 12(d)(7) of the Housing Act of 1937)? **Exchanging data to track sanctions and time limits on tenant. A proposed MOU has been forwarded , but no discussion.**

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

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

- Client referrals
- Information sharing regarding mutual clients (for rent determinations and otherwise)
- Coordinate the provision of specific social and self-sufficiency services and programs to eligible families
- Jointly administer programs
- Partner to administer a HUD Welfare-to-Work voucher program
- Joint administration of other demonstration program
- Other (describe) **Received \$2.3 million for employment and training of tenants from TANF local agency, Franklin County Department of Jobs and Family Services**

B. Services and programs offered to residents and participants

(1) General

a. Self-Sufficiency Policies

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

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

b. Economic and Social self-sufficiency programs

Yes No: Does the PHA coordinate, promote or provide any programs to enhance the economic and social self-sufficiency of residents? (If

“yes”, complete the following table; if “no” skip to sub-component 2, Family Self Sufficiency Programs. The position of the table may be altered to facilitate its use.)

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
Urban League	350	Meet TANF	Urban League	Public Housing
		30 months dependency	Indian Meadows	
			Thornwood	
			Lincoln Park	
Columbus Works	100	200% of Poverty	Riverside-Bradley	Public Housing
T.E.A.C.H	200	“	Poindexter	“
Urban League	275	“	Trevitt Heights and Sawyer Manor	“
H.O.S.T	150	“	Post Oaks	“
Columbus State Community Col.	650	“	Rosewind	“
Community Refugee Immigration Services	100	“	Lincoln Park	“

(2) Family Self Sufficiency program/s

a. Participation Description

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

b. ____ Yes ____ No: If the PHA is not maintaining the minimum program size required by HUD, does the most recent FSS Action Plan address the steps the PHA plans to take to achieve at least the minimum program size?
If no, list steps the PHA will take below:

C. Welfare Benefit Reductions

1. The PHA is complying with the statutory requirements of section 12(d) of the U.S. Housing Act of 1937 (relating to the treatment of income changes resulting from welfare program requirements) by: (select all that apply)

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

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

SEE ATTACHMENT J

13. PHA Safety and Crime Prevention Measures

[24 CFR Part 903.79 (m)]

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

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

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

- High incidence of violent and/or drug-related crime in some or all of the PHA's developments
- High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to the PHA's developments
- Residents fearful for their safety and/or the safety of their children
- Observed lower-level crime, vandalism and/or graffiti

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

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

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

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

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

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

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

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

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

Same as above in 13, A, 3

C. Coordination between PHA and the police

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

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

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

Same as listed above in 13, A, 3

D. Additional information as required by PHDEP/PHDEP Plan

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

- Yes No: **Is the PHA eligible to participate in the PHDEP in the fiscal year covered by this PHA Plan?**
- Yes No: **Has the PHA included the PHDEP Plan for FY 2001 in this PHA Plan?**
- Yes No: **This PHDEP Plan is an Attachment. (Attachment Filename: ___)**

14. RESERVED FOR PET POLICY

24

CFR Part 903.7 9 (n)]

CMHA PET OWNERSHIP LEASE ADDENDUM

If you chose to own a pet, it should be noted that pets are a serious responsibility both personally and financially. Any animal brought into your home is to be treated in a humane manner at least as defined by law.

The below listed rules and regulations will become a part of the existing lease between the tenant and the Columbus Metropolitan Housing Authority if you have chosen to own a pet: Animals that assist the handicapped are excluded from the height provision of this addendum as well as the non-refundable fee provision.

Only one dog or cat is permitted per unit. Only common, household pets will be permitted such as dogs, cats, birds, turtles and fish. No exotic animals, mammals, reptiles, rodents or insects are allowed.

There will be a monthly fee of \$25 per dog or per cat payable to the Housing Authority. This fee is not a limit on the tenant's liability for property damage, cleaning, deodorization, defleaing, replacements and or personal injuries. Any/all members (of legal age) of the household are liable if they are listed on the lease.

The tenant must advise the Manager in writing of their desire to own a pet. Permission to keep a pet is conditional during the term of tenancy, provided that all

rules and regulations are adhered to, whether they be CMHA rules and regulations or applicable laws or ordinances.

The pet must not exceed 35 pounds at maturity. CMHA automatically excludes Pit Bull Terriers or any animals used for fighting purposes or any animals deemed vicious, dangerous or a nuisance by law or ordinance (Columbus City Health Code, Chapter 243, Vicious, Dangerous and Nuisance Animals and ORC Section 955.11).

The tenant must provide proof of licensing each year, which is payable to Franklin County by January 20th of each year. Failure to provide this information to CMHA management is considered a lease violation and could result in eviction.

A statement is required from a veterinarian that the animal has been spayed or neutered prior to occupancy in the unit, and proof that all required vaccinations have been administered as required by law is required to be given to the manager prior to the animal's occupancy of the unit. Owners must maintain current inoculations of pets as defined by the Columbus Health Department and such records are to be made available upon request of management.

Animals must be kept on a leash when outside their unit and under control of their handler. Management has the right to arrange for pick up of unleashed pets and report them to the proper authorities and any or all fines imposed by authorities are the tenant's responsibility.

It is the tenant's responsibility for clean up and to properly dispose of animal waste and residents shall comply with local ordinances regarding pet defecation.

Excessive barking, whining or howling by animals is considered to be a violation of other tenants' peaceful enjoyment and will be considered a lease violation if not immediately corrected. Residents agree to immediately and permanently remove the pet from the premises if CMHA receives complaints from neighbors or other tenants or if the pet has disturbed the rights, comforts or conveniences of neighbors or other residents.

Guests are not permitted to bring pets into tenant's units.

Residents are not permitted to "house sit" any pets belonging to others for any reason.

Pets are not to be tied to any fixed object outside their dwelling unit.

Pets are not permitted in common areas or any posted areas shared simultaneously

by other tenants .

Pets are to be fed and watered inside the tenant's unit - no food or water is allowed to be stored outside of unit or in common areas.

Pets must be secured (i.e., caged or placed in a room) when the tenant is not at home or when a CMHA employee enters the unit for any reason.

Tenant must inform management who will be responsible for the care of their pet in the event they become ill for an extended period of time or in the event of their death or any emergency situation.

Each adult tenant who is signed on the lease shall also sign the Pet Ownership Lease Addendum. Tenants shall be jointly and severally liable for damages and all other obligations set forth herein, even if such resident does not own the pet.

Each tenant shall pay for cleaning, defleaing, and deodorizing their unit as directed by the manager and/or prior to move out, and this service will be secured by Management and paid by tenant prior to any refund of housing deposit.

If any rule or provision of this Pet Addendum is violated by tenants or tenants' guests or occupants, residents shall immediately and permanently remove the pet from the premises upon written notice from management or their representative; and, management shall have all other rights and remedies set forth in the standard lease agreement including damages, eviction and/or attorney's fees.

CMHA Management shall have the right from time to time to make reasonable changes and/or additions to these rules and will notify tenants in writing of any said changes.

Signed:

CMHA Management _____

Pet Description:

Male/Female _____ Name _____

Dog/Cat/Other _____

Description _____ (n
o other pet may be substituted)

Veterinarian Statement of Spayed/Neutered _____

License No. _____

Shot Record Compliance _____

Fee Paid _____

Emergency Notification: _____

In the event of my death or extended illness, _____
has agreed to care for my pet. They may be reached at _____

No Pet Clause:

By signing this clause I certify that I do not keep a pet of any kind. I understand that if I acquire a pet while the current lease is in force the conditions of this document, including a non-refundable fee, will go into effect.

Management _____ Tenants _____

15. Civil Rights Certifications

[24 CFR Part 903.7 9 (o)]

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

16. Fiscal Audit

[24 CFR Part 903.7 9 (p)]

1. Yes No: Is the PHA required to have an audit conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h))?
(If no, skip to component 17.)
2. Yes No: Was the most recent fiscal audit submitted to HUD?
3. Yes No: Were there any findings as the result of that audit?
4. Yes No: If there were any findings, do any remain unresolved?
If yes, how many unresolved findings remain? _____

5. Yes No: Have responses to any unresolved findings been submitted to HUD?
If not, when are they due (state below)?

17. PHA Asset Management

[24 CFR Part 903.79 (q)]

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

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

18. Other Information

[24 CFR Part 903.79 (r)]

A. Resident Advisory Board Recommendations

1. Yes No: Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?
2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)
- Attached at Attachment **(See Attachment F)**
- Provided below:

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

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

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

List changes below:

Added possible program for the sale of Scattered Site homes to tenants

Other: (list below)

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

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

2. Yes No: Was the resident who serves on the PHA Board elected by the residents? (If yes, continue to question 3; if no, skip to sub-component C.)

3. Description of Resident Election Process

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

Candidates were nominated by resident and assisted family organizations

Candidates could be nominated by any adult recipient of PHA assistance

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

Other: (describe) **Mayoral Appointment**

b. Eligible candidates: (select one)

Any recipient of PHA assistance

Any head of household receiving PHA assistance

Any adult recipient of PHA assistance

Any adult member of a resident or assisted family organization

Other (list) **Mayor choose from list of active resident council officers**

c. Eligible voters: (select all that apply)

All adult recipients of PHA assistance (public housing and section 8 tenant-based assistance)

Representatives of all PHA resident and assisted family organizations

Other (list)

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

C. Statement of Consistency with the Consolidated Plan

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

1. Consolidated Plan jurisdiction: (provide name here)

Franklin County, Ohio
City of Columbus, Ohio

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

The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.

The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.

The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.

Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)

Other: (list below)

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

D. Other Information Required by HUD

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

Attachments

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

PHA Plan Table Library

Component 7

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

Annual Statement

Capital Fund Program (CFP) Part I: Summary

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

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

Development Number/Name	General Description of Major Work Categories	Development Account	Total Estimated

Table Library

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

Development Number/Name	All Funds Obligated (Quarter Ending Date)	All Funds Expended (Quarter Ending Date)

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

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

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

COLUMBUS METROPOLITAN HOUSING AUTHORITY
ADMISSION & OCCUPANCY POLICY

Prepared for Low Income Public Housing Department

May 2000

NOTES:

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

I. BACKGROUND

- A. Recent legislation has eliminated the requirement for Public Housing Authorities to use Federal preferences for admission to public housing. PHA's may now use a local preference system of their own choice subject to public hearing requirements. The Federal preferences will be permanently abolished.
- B. Currently, CMHA has adopted a revised local preference system for the Public Housing program to promote diversity in program participation and includes families who can serve as role models.
- C. Part of the Admissions & Occupancy Policy are a direct result of the Settlement Agreement known as West v. Bradley - Exhibit 6
 - 1. Section II.A.,B.,C. and Section IV.G.1-11
 - 2. Section IV.E.1-6, exhibit 2
 - 3. Section IV.F.1-2, exhibit 3.A., 3.B.
 - 4. Section IV.H.1-4 and Section XII
 - 5. Section XI as applicable

II. POLICY STATEMENT

- B. CMHA will endeavor to attract working families with a broad range of eligible incomes in its Public Housing program. This policy has been implemented in accordance with all current or future income-based admission restrictions imposed by statute or regulation. In its public housing program, CMHA will target a minimum of 50% of new admissions to lower income families earning 30% or less of the median income as adjusted for family size in an effort to serve the housing needs of low income and very low income families.
- C. In each public housing community, CMHA's goal will be to have at least 50% of resident families earning more than 30% of median income. Further, to promote housing communities, CMHA will establish flat rents that will enable and encourage families with rising incomes to remain as residents of public housing. Residents will be given the opportunity on an annual basis to elect a flat rent system or 30% adjusted by family size. See Exhibit on Annual Selection of Rent Payment.
- D. The HA will adopt a site based wait list policy at communities identified in the 5 and 1 year Plan to provide a customer based approach to provide housing to low and moderate income working families. Policies and the administration

thereof will comply with all applicable laws relating to Civil Rights as identified in the HA Policy on nondiscrimination (section IV of this policy) and 24 CFR 903.

- E. In order to serve eligible client populations that are, for example, severely disadvantaged, homeless, disabled or victims of domestic violence, CMHA may enter into separate lease agreements for public housing units with service providers or other appropriate agencies that will provide services and special assistance to these populations under the terms of the lease agreement. Such leasing agreements may not exceed 20% of available housing units at any time.

III. GENERAL STATEMENT OF POLICIES AND OBJECTIVES

A. Introduction

- 1. The Low Rent Public Housing Program was created by the U.S. Housing Act of 1937. Administration of the Public Housing Program and the functions and responsibilities of the Columbus Metropolitan Housing Authority (CMHA) staff will be in compliance with CMHA's Admissions and Occupancy Policies and the requirements of the U.S. Department of Housing and Urban Development's (HUD's) Public Housing Regulations, Handbooks, and Notices where applicable, as well as all Federal, State and local laws. Changes in applicable federal law or regulations will supersede provisions in conflict with this Policy.

B. Purpose

- 1. The purpose of this Admissions and Occupancy Policy is to:
 - a. Provide a standard policy which will enable CMHA staff to administer the Public Housing Program consistently and fairly.
 - b. Provide an ongoing training document for both experienced and newly hired staff.
 - c. Provide answers to the Public Housing Program questions that are beyond the scope of the federal regulations.
 - d. Provide CMHA residents and other members of the public with a basis for CMHA decisions.

IV. ELIGIBILITY FOR ADMISSION AND PROCESSING OF APPLICATIONS

A. Nondiscrimination

- 1. It is the policy of Columbus Metropolitan Housing Authority (CMHA) to comply with all applicable laws relating to Civil Rights, 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) the Quality Housing & Work Responsibility Act (QHWRA), any applicable Statdaws or local ordinances and any legislation protecting the individual rights of tenants, applicants or staff that may subsequently be enacted. (24 CFR § 960.203)

2. CMHA will not discriminate because of race, color, sex, religion, familial status, disability, national origin, sexual orientation in the leasing, rental, or other disposition of housing or related facilities, including land, that is part of any project or projects under HA's jurisdiction covered by a contract for annual contributions under the United States Housing Act of 1937, as amended, or in the use or occupancy thereof.¹ (24 CFR § 100.5)
3. CMHA will not, on account of race, color, sex, religion, familial status, disability, national origin or sexual orientation:
 - a. Deny to any family the opportunity to apply for housing, nor deny to any qualified applicant the opportunity to lease housing suitable to its needs;
 - b. Provide offers of housing different from housing provided others based on Fair Housing Amendments;
 - c. Subject a person to segregation or disparate treatment;
 - d. Restrict a person's access to any benefit enjoyed by others in connection with the housing program;
 - e. Treat a person differently in determining eligibility or other requirements for admission;
 - f. Deny a person access to the same level of services; or
 - g. Deny a person the opportunity to participate in a planning or advisory group which is an integral part of the housing program.
4. CMHA will not automatically deny admission to a particular group or category of otherwise qualified applicants. Each applicant in a particular group or category must be treated on an individual basis in the normal processing routine. (24 CFR § 960.205)
5. CMHA will identify and eliminate situations or procedures that create a barrier to equal housing opportunity for all. In accordance with Section 504, and the Fair Housing Amendments Act of 1988 HA will make structural modifications to its housing and non-housing facilities (24 CFR §§ 8.21, 8.23, 8.24, and 8.25) make reasonable accommodations (24 CFR §

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

100.204), or combinations of the two, to permit people with disabilities to take full advantage of the housing program.

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

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

B. Accessibility and Plain Language

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

applicant's ability to read or understand – so rules and benefits may have to be explained verbally – perhaps more than once. (24 CFR § 8.6)

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

C. Marketing

1. It is the policy of CMHA to conduct outreach as needed to maintain an adequate application pool representative of the eligible population in the area. Outreach efforts will take into consideration the level of vacancy in the HA's units, availability of units through turnover, and waiting list characteristics. CMHA will periodically assess these factors in order to determine the need for and scope of any marketing efforts. The following will be consistently utilized in the HA marketing efforts:
 - a. Information containing a brief property description, amenities, and other pertinent information regarding the neighborhood, location, and services available.
 - b. An Integrated Voice Response (IVR) system to provide an updated status of the client's application via telephone at Central Office.
 - c. Demographic studies of the market area versus the population currently housed.

d. Other information determined relevant by the HA.

2. Marketing and informational materials will be subject to the following:

- a. All marketing materials must comply with Fair Housing Act requirements with respect to wording, logos, size of type, etc. [24 CFR §109.30(a)];
- b. Marketing should be "plain language" and should use more than strictly English-language print media;
- c. An effort should be made to target all agencies that serve and advocate for potentially qualified applicants (e.g. the disabled, to ensure that accessible/adaptable units are used by people who can best take advantage of their features).
- d. Marketing materials should make clear who is eligible: individuals and families, people with both physical and mental disabilities.

D. Qualification for Admission

1. It is CMHA's policy to admit only qualified applicants². Clients are interviewed without an appointment if gainfully employed, elderly, and/or disabled. Clients are interviewed by a scheduled appointment if not gainfully employed.
2. An applicant is qualified if he or she meets all of the following criteria:
 - a. Is a family as defined in Section 13 Definition 14 of this policy³;
 - b. Heads a household where all members of the household are citizens or eligible non-citizens; (24 CFR § 200, and §912.5 through 912.14)
 - c. Has an Annual Income at the time of admission that does not exceed the low or very low income limits for occupancy established by the Department of Housing and Urban Development.
 - d. Provides a copy of the Social Security card for all family members or

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

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

can document and certify that they do not have Social Security numbers; (24 CFR § 913.109)

- e. Meets or exceeds the Applicant Selection Criteria, including completion of a CMHA-approved pre-occupancy class; (24 CFR § 960.205)
- f. Is not currently adequately housed in a CMHA dwelling unit. Applicants who are listed on a current CMHA dwelling lease (or is part of the household as verified by CMHA records) and reside in a unit meeting the occupancy standards for the family size is not qualified for admission and will not be placed on the waiting list for new applicants.

E. Waiting List Management

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

3. Waiting Lists and the Local Preferences

- a. During periods when the Waiting List is open and CMHA is accepting new applications, CMHA will place an applicant on the waiting list if the applicant is otherwise eligible for assistance AND claims that he or she qualifies for a Local Preference. (24 CFR § 960.207)
 - i. Category 1 - Families earning less than 30% of median income as adjusted for family size will be ordered by date of application receipt. Incomes will be verified prior to admission. If income increases beyond 30% of median income, applicants may elect to be transferred to the Category 2 list or to retain their position on the Category 1 list. If an election is made to transfer to the Category 2 list, placement will be made based upon the original date of application receipt. It is the applicant's responsibility to report in writing any changes in income.
 - ii. Category 2 - Families earning 30% or more of the median income as adjusted for family size will be ordered by date of application receipt. Incomes will be verified prior to admission. Failure to meet the income test at the time of admission will result in transfer to the Category 1 list with placement based upon the original date of application.
 - iii. Statutory Preferences - in either list, in accordance with State law, applicants with veterans' status will be given priority over any other member of that grouping. The foregoing public housing admission selection policies do not affect the statutory admissions preference of the elderly, disabled or displaced over other singles set forth in 24CFR 912.3 and 950.301 (d) of the program regulations.
 - iv. 504 Preferences -An applicant or family member who has a mobility or other impairment that makes the person unable to use critical elements of the housing unit, and the owner is not legally obligated to make reasonable accommodation by making changes to the unit. Referrals must be made by an officially recognized agency whose primary purpose is to provide assistance to persons with disabilities.
 - iv. Executive Preferences - the Executive Director or designee has the authority to elect preferences and make decisions regarding preferences in special circumstances ie. witness protection, domestic abuse, etc.
- b. EXCEPT THAT, CMHA may refuse to place such a Local Preference applicant if the following are true:
 - i. There is an adequate pool of applicants already on the waiting list who are likely to qualify for a Local Preference; and [See

24 CFR § 960.207 (b) (1)]

- ii. It is unlikely that under CMHA's system for applying the Local Preferences that the family making the application could qualify for assistance ahead of other applicants already on the waiting list. [See 24 CFR § 960.207 (b) (2)]
- c. The determination in (b) above is based on the Local Preference system described in these policies, the preference or preferences claimed by applicants already on the waiting list, and the preference or preferences claimed by the applicant seeking placement on the waiting list.

4. Determining if the Waiting List may be Closed

CMHA will use its Procedure pertaining to Waiting List Closure ⁴ to determine whether the waiting list(s) may be closed.

5. Change in Preference Status While on the Waiting List

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

6. Removal of Applications from the Waiting List

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

7. Site Based Wait List

- a. The HA may elect to implement site based waiting lists as a means to offer specific sites to eligible families that would assist in obtaining de-concentration and income-mixing objectives.
 - i. Skipping a family on the wait list to reach a lower or higher

⁴ This policy refers to written procedures that cover, in this case, the closing of the waiting list. References to other administrative procedures is made periodically in the text of this policy. These procedures may be separate documents that describe the work steps necessary to implement the policy choices made in this document. Exhibit 1.

- income is acceptable in an effort to reach income-mixing goals.
- ii. Specific locations with a site based wait list are identified in the Agency's 5 and 1 Year Plan.
 - iii. The HA will conduct periodic audits, at least biannually, of Fair Housing compliance in administration of the site based wait list. Demographic studies and regular quality control practice will be utilized to monitor racial and income mixing goals. Every third year an independent third party will be utilized for a Fair Housing evaluation.
 - iv. Specific information and materials will be made available at site based wait list communities and Central Office locations that include characteristics, amenities, participating locations, and the approximate time an applicant will wait for an appropriate unit.
- b. Site Based Wait List positioning will have no bearing on any other Public Housing Wait List positioning.
- i. Applicants may be on up to two PH Wait Lists, ie. Conventional Program and Site Based or two different Site Based Wait Lists.
 - ii. Once the applicant is housed, the application for all other PH units is automatically withdrawn.
- c. Site Based Wait List Preferences are as follows:
- i. Category 1 - Families earning less than 30% of median income as adjusted for family size will be ordered by date of application receipt. Incomes will be verified prior to admission. It is the applicant's responsibility to report in writing any changes in income.
 - ii. Category 2 - Families earning 30% or more of the median income as adjusted for family size will be ordered by date of application receipt. Incomes will be verified prior to admission. Failure to meet the income test at the time of admission will result in transfer to the Category 1 list with placement based upon the original date of application.
 - iii. Statutory Preferences - In either list, in accordance with State law, applicants with veterans' status will be given priority over any other member of that grouping. The foregoing public housing admission selection policies do not affect the statutory admissions preference of the elderly, disabled or displaced over other singles set forth in 24CFR 912.3 and 950.301 (d) of the program regulations.

- d. Once the unit is offered, the applicant will have 3 days to pay the security deposit and first month rent. Failure to do so will result in a forfeiture of any applicable Local Preference. The applicant will be then dropped to the bottom of the Qualified Wait List. Failure to pay the security deposit and first month rent a second time will result in the applicant being dropped from the qualified applicant Wait List.

F. Processing Applications for a unit offer and admission

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

of this policy.)

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

G. The Preference System

1. It is CMHA's policy that a preference does not guarantee admission. Preferences are used to establish the order of placement on the waiting list. Every applicant must still meet CMHA's Resident Selection Criteria before being offered a unit.
2. Preferences will be granted to applicants who are otherwise qualified and who, at the time they are certified for admission, meets the definitions of the preferences described below.
3. If there are no applicants on the waiting list(s) that qualify for the local preferences, otherwise eligible non-preference families will be selected.
4. Factors other than preferences that affect the selection of applicants from the waiting list [24 CFR § 960.211 (b)(1)]
 - a. When selecting a family for a unit with accessible features, CMHA will give a preference to families that include persons with disabilities who can benefit from the unit's features. Physically disabled persons will be identified by a red folder.
 - b. If no family can be found for a unit with accessible features, CMHA will house a family not needing the unit features subject to the procedures described in the Tenant Selection and Assignment Plan.
 - c. When selecting a family for a unit in housing designated for elderly families or housing designated for disabled families, CMHA will give a preference to elderly or disabled families.
 - d. When selecting a family for a unit in a mixed population housing (the property houses both elderly and disabled families) CMHA will give a preference to elderly families and disabled families.
 - e. When selecting a single person for a unit in a mixed population housing, elderly or disabled single persons have preference over singles who are neither elderly nor disabled. [24 CFR § 960.407]
 - f. Any admission mandated by court order related to desegregation or Fair Housing and Equal Opportunity will take precedence over the Preference System. Other admissions required by court order will also take precedence over the Preference System.

5. Preference System — CMHA will use local preferences in its preference system.
6. CMHA will not give a preference to an applicant if any member of the applicant family is a person evicted because of drug-related criminal activity from housing assisted under the 1937 Housing Act. [24 CFR 960.211 (b) (3)] CMHA may give an admission's preference in any of the following cases:
 - a. If CMHA determines that the evicted person has successfully completed a rehabilitation program approved by CMHA;
 - b. If CMHA determines that the evicted person clearly did not participate in or know about the drug-related criminal activity; or
 - c. If CMHA determines that the evicted person no longer participates in any drug-related criminal activity.
7. The preference system described above will work in combination with requirements to match the characteristics of the family to the type of unit available, including units with targeted populations. When such matching is required or permitted by current law CMHA will give preference to the families described below. The ability to provide preferences for some family types will depend on unit size available.
 - a. Units designated for the elderly⁵ (24 CFR §§ 945.201, 945.105, 945.203, and 945.303) — in accordance with the 1992 Housing Act elderly families with a head, spouse or sole member at least 62 years of age will receive a preference for admission to such units or buildings covered by a HUD-approved Allocation Plan.
 - i. When there are insufficient elderly families on the waiting list, near-elderly families (head or spouse ages 50 to 61) may receive a preference for this type of unit.
 - ii. When there are insufficient elderly or near-elderly families and units are ready for leasing more than 60 days all other family types are eligible for such units.
 - iii. Units with accessible features — Families with members who require a unit with accessible features will receive preference for such units over families who do not require such features. The application folder will be red to indicate the applicant's preference in processing.

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

- b. Units designated for the disabled⁶ (24 CFR §§ 945.105, 945.201, 945.203, 945.205, and 945.303) — in accordance with the 1992 Housing Act, disabled families with a head, spouse or sole member who qualifies as a person with disabilities as defined in 24 CFR § 945.105 will receive a preference for admission to units that are covered by a HUD-approved Allocation Plan. The application folder will be blue to indicate the applicant’s preference in processing.
 - i. Units with accessible features — Families with members who require a unit with accessible features will receive preference for such units over families who do not require such features.
- c. Mixed population units⁷ (24 CFR §§ 945.105 and 960.401, 960.403, 960.405, 960.407 and 24 CFR § 945.407)— in accordance with the 1992 Housing Act elderly families whose head, spouse or sole member is at least 62 years of age and disabled families, a family whose head, spouse, or sole member is a person with disabilities, will receive equal preference for admission to such units. No limit will be established on the number of elderly or disabled families that may occupy a mixed population property.
 - i. Local preferences will be applied when selecting applicants for admission to this type of property.
 - ii. Elderly families or disabled families without a local preference can be given a preference for admission over non-elderly and non-disabled families that do qualify for such preferences.[24 CFR § 960.407 (c)]
 - iii. Elderly or disabled applicants who are single persons will be given a preference for admission over single persons who are neither elderly nor disabled.
 - iv. Units with accessible features — Families with members who require a unit with accessible features will receive preference for such units over families who do not require such features and will be identified with a color representing the preference as described herein.
- d. Units with accessible features, in any property CMHA will give a preference to families that include a person with disabilities who can benefit from the features in the unit.

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

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

8. Administration of the Preferences

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

9. Executive Preferences

CMHA may enter into separate lease agreements for PH units with service providers or other appropriate agencies that will provide services and special assistance to these populations under the terms of the lease agreement. Such leasing agreements may not exceed 20% of available housing units at any time. Established Executive Preferences are as follows:

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

housing.

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

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

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

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

color, religion, national origin, age, disability, sexual orientation or familial status has contributed to the CMHA's decision to deny the preference.

H. Applicant Selection Criteria

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

1. All applicants must demonstrate through an assessment of current and past behavior the ability:
 - a. to pay rent and other charges as required by the lease in a timely manner;
 - b. to care for and avoid damaging the unit and common areas;
 - c. to use facilities and equipment in a reasonable way;
 - d. to create no health, or safety hazards, and to report maintenance needs;
 - e. not to interfere with the rights and peaceful enjoyment of others, and to avoid damaging the property of others;
 - f. not to engage in criminal activity that threatens the health, safety or right to peaceful enjoyment of other residents or staff; and not to engage in drug-related criminal activity on or near CMHA premises;
 - g. to comply with necessary and reasonable rules and program requirements of HUD and the HA; and,
 - h. to comply with health and safety codes.
2. How CMHA will check ability to comply with essential lease requirements:
 - a. Applicant ability and willingness to comply with the essential lease requirements will be checked and documented. Information to be considered in completing applicant screening will be reasonably related to assessing the conduct of the applicant and other family members listed on the application, in present and prior housing.
 - b. The history of applicant conduct and behavior must demonstrate that the applicant family can reasonably be expected not to:
 - i. Interfere with other residents in such a manner as to diminish their peaceful enjoyment of the premises by adversely affecting their health, safety, or welfare; [24 CFR § 960.205 (b)]
 - ii. Adversely affect the physical environment or financial stability of the project; [24 CFR § 960.205 (b)]

- iii. Violate the terms and conditions of the lease; [24 CFR § 8.3 Definition: Qualified individual with disabilities]
- iv. Require services from CMHA staff that would alter the fundamental nature of CMHA's program. [24 CFR § 8.3 Definition: Qualified individual with disabilities]
- c. CMHA will conduct a detailed interview of all applicants using an interview checklist. The checklist is part of the screening procedures used in support of this policy. The form will ask questions based on the essential elements of tenancy. Answers will be subject to third party verification. [24 CFR §960,,206 (a) &(b)]
- d. CMHA will complete a rental history check on all applicants.
- e. Payment of funds owed to CMHA is part of the screening evaluation. Payment of outstanding balances is an opportunity for the applicant to demonstrate an improved track record. CMHA will consider any past balances owed CMHA by the applicant for any program that CMHA operates. CMHA expects these balances to be paid in full (either in a lump sum or over time) before initiating the full screening process. CMHA will not admit families who owe back balances. (See § 960.205 (b)(1))
- f. CMHA will complete a criminal background check on all applicants including other adult members in the household or any member for whom criminal records are available. [24 CFR 960.205 (b)(3)]
- g. CMHA's examination of relevant information respecting past and current habits or practices will include, but is not limited to, an assessment of:
 - i. The applicant's past performance in meeting financial obligations, especially rent. [24 CFR § 960.205 (b) (1)]
 - ii. A record of disturbance of neighbors, destruction of property, or living or housekeeping habits at present or prior residences which may adversely affect the health, safety, or welfare of other tenants or neighbors. [24 CFR § 960.205 (b) (2)]
 - iii. Any history or record of criminal activity on the part of any applicant family member involving crimes of physical violence to persons or property and other criminal acts including drug-related criminal activity which would adversely affect the health, safety, or welfare of other residents or staff or cause damage to the unit or the development. (24 CFR § 960.205 (b) (3) and the Anti-Drug Act of 1988)
 - iv. A record of eviction from housing or involuntary termination from residential programs.
 - v. An applicant's ability and willingness to comply with the terms of CMHA's lease. (24 CFR § 8.2 Definition: Qualified Individual with Disabilities)

- ii. Evidence of the applicant family's participation in social service or other appropriate counseling service.
- iii. Evidence of successful and sustained modification of previous disqualifying behavior.
- e. Consideration of mitigating circumstances does not guarantee that applicant will qualify for admission. CMHA will consider such circumstances in light of:
 - i. the applicant's ability to substantiate through verification the claim of mitigating circumstances and his/her prospects for improved future behavior; and
 - ii. the applicant's overall performance with respect to all the screening requirements; and,
 - iii. the nature and seriousness of any criminal activity, especially drug related criminal activity that appears in the applicant's record.

4. Qualified and Unqualified Applicants

- a. Verified information will be analyzed and a determination made with respect to:
 - i. Eligibility of the applicant as a family; (See 24 CFR § 912.2)
 - ii. Eligibility of the applicant with respect to income limits for admission; (See 24 CFR § 913.104 & 105)
 - iii. Eligibility of the applicant with respect to citizenship or eligible immigration status; [24 CFR § 912.4(b)]
 - iv. Unit size required for the family;
 - v. Preference category (if any) to which the family is entitled; (24 CFR § 960.211)
 - vi. Qualification of the applicant with respect to the Applicant Selection Criteria. (24 CFR § 960.205)
- b. Families determined to be qualified will be notified by CMHA of the approximate date of occupancy insofar as that date can be reasonably determined. [24 CFR § 960.207 (b)]
- c. Assistance to a family may not be delayed, denied or terminated on the basis of the family's ineligible immigration status unless and until the family completes all the verification and appeals processes to which they are entitled under both INS and CMHA procedures. [24 CFR § 912.9]
- d. CMHA will make every effort to accurately estimate an approximate date of occupancy. However, the date given by CMHA does not mean that applicants should expect to be housed by that date. The availability of a suitable unit to offer a family is contingent upon

factors not directly controlled by CMHA, such as turnover rates, and market demands as they affect bedroom sizes and project location. [24 CFR § 960.207 (b)]

- e. Applicants determined unqualified for admission will be promptly notified. These applicants will receive a Notice of Rejection from CMHA, stating the basis for such determination. CMHA will provide such applicants with an opportunity for Informal Review and Grievance of the determination as described in the Resident Grievance Procedure (XI.G. Resident Grievance Procedure). [24 CFR § 960.207(a)]

I. Occupancy Guidelines

- 1. It is CMHA's policy that units should be occupied by families of the appropriate size. This policy maintains the usefulness of the units, while preserving them from excessive wear and tear or underutilization.
 - a The following general unit maximum and minimum number of persons per unit will govern the assignment of a family of a given size and composition. These are only guidelines and the maximums may be exceeded at the request of the family, or because of the square footage of a specific unit:

Occupancy Guidelines Chart

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

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

V. TENANT SELECTION AND ASSIGNMENT PLAN

A. Organization of the Waiting List

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

B. Method of Applicant Selection

1. CMHA will first match the characteristics of the applicant to the unit available, including any priorities for admission required for designated or mixed population housing. Applicable Local preferences as described earlier in this policy will then be used to determine the order of selection from each waiting list. [24 CFR §§ 945.303 and 960.407] Further, in the selection of a family for a unit with accessible features CMHA will give preference to families that include a person with disabilities who can benefit from the unit features. [24 CFR § 8.27]

2. The plan for selection of applicants and assignment of dwelling units to assure equal opportunity and nondiscrimination on grounds of race, color, sex, religion, sexual orientation, or national origin is Exhibit 3. Under this plan each qualified applicant first in sequence on the Public Housing waiting list is made one offer of a unit of appropriate size. The applicant must accept the vacancy offered or be dropped from the qualified applicant list, losing any applicable Local preferences. In cases where an applicant is on two, qualified wait lists and refuses an offer from one list, the applicant will remain on the second list; the applicant will forfeit preference positioning on any remaining wait list.
3. The applicant must accept the vacancy offered within 3 working days of the date the offer is communicated (by phone, mail, or the method of communication designated by the applicant) or, be dropped from the qualified applicant list. Offers made over the phone will be confirmed by letter to the applicant. If unable to contact an applicant by phone CMHA will send a registered letter, return receipt requested.
 - a. Applicants must pay the security deposit within 5 days of the unit offer. The security deposit is to be equivalent to one month gross rent. Failure to do so will result in the applicant being dropped from the qualified applicant list.
 - b. Extensions of payment of the security deposit may be granted if there is a promotion or marketing objective in effect for the site. Special circumstances, determined by the HA, may also be considered in extending the 5 day requirement for payment of deposit.
4. "Dropped from the list" will mean the applicant will lose standing by being removed from the waiting list. Once dropped from the list applicants must wait for 6 months before reapplying to any public housing program.
5. If more than one unit of the appropriate size and type is available, the first unit to be offered will be the unit that was ready for occupancy first.
6. If an applicant is willing to accept the unit offered but is unable to move at the time of the offer and presents to the satisfaction of CMHA clear evidence ("good cause") that acceptance of the offer of a suitable vacancy will result in undue hardship or disability not related to considerations of race, color, sex, religion, sexual orientation or national origin, the applicant will not be dropped from the list. [24 CFR § 1.4 (b)(2)(ii) & (iii)]
7. Examples of good cause reasons for the refusal of an offer of housing include, but are not limited to:
 - a. Inaccessibility to a source of employment or children's day care such that an adult household member must quit a job, drop out of an

- educational institution or job training program;
 - b. Presence of lead paint in the unit offered when the applicant has children under the age specified by current law;
 - c. The family demonstrates to CMHA's satisfaction that accepting the offer will result in a situation where a family member's life, health or safety will be placed in jeopardy. The family must offer specific and compelling documentation such as restraining orders, other court orders, or risk assessments related to witness protection from a law enforcement agency. Reasons offered must be specific to the family. Refusals due to location alone are not good cause.
 - d. A health professional verifies temporary hospitalization or recovery from illness of the principal household member, other household members or live-in aide (each as listed on final application) necessary to the care of the principal household member;
 - e. The unit is inappropriate for the applicant's disabilities.
 - f. An elderly or disabled family makes the decision not to occupy or accept occupancy in designated housing. [24 CFR § 945.303 (d)]
8. The applicant must be able to document that the hardship claimed is good cause for refusing an offer of housing. Where good cause is verified to CMHA's satisfaction, the refusal of the offer will not require that the applicant be dropped from the waiting list or otherwise affect the family's position on the waiting list. [24 CFR § 85.42]
9. CMHA will maintain a record of units offered, including location, date, and circumstances of each offer, and each acceptance or rejection, including the reason for the rejection.
- C. Occupancy of Dwelling Units with accessible or adaptable features [24CFR § 8.27 (a) (1) (2) and (b)]
- 1. Before offering a vacant, accessible unit to a non-disabled applicant, CMHA will offer such units:
 - a. First, to a current occupant of another unit of the same development, or other public housing developments under CMHA's control, having a disability that requires the special features of the vacant unit (in effect, a transfer of the occupant with disabilities from a non-adapted unit to the vacant accessible/adapted unit if requested).
 - b. Second, to an eligible-qualified applicant on the waiting list having a disability that requires the special features of the vacant unit.
 - 2. When offering an accessible/adaptable unit to a non-disabled applicant, CMHA will require the applicant to agree to move to an available non-accessible unit within 30-days when either a current resident or an applicant needs the features of the unit. This requirement will be reflected in the lease agreement signed with the applicant.

D. Leasing and Occupancy of Dwelling Units

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

1. Applicant folders will be processed centrally. Initial intake, waiting list management, screening, and offers of housing will be made at central office and specified sites. Transfers will be made exclusively at Central Office.
2. When offering units CMHA will provide the applicant with a brief property description and other information to help orient the applicant to the neighborhood and location in the property. The manager of the property will be advised of the offer and will contact the applicant to set up a date to show the unit.
3. Once the unit is shown and the applicant accepts the unit, the manager will execute a lease. If the applicant refuses the unit, the reason for refusal must be obtained in writing from the applicant. The applicant must sign the refusal form. The form is then sent to central office for a "good cause" determination. No applicant will be expected to sign a lease for a unit that is not ready for occupancy. § 966,4 (i))
4. Managers will show and lease units. If an exception to CMHA's occupancy standards is approved for the applicant this information will be noted on the leasing packet sent to the manager.
5. Changes in family composition, income, or status between the time of the interview with the applicant and the showing of the unit, or between annual reexaminations will be processed centrally, excluding applicants assigned to a community with a site based wait list (Exhibit 3). Managers will work with central office to forward necessary information and coordinate this activity with the applicant or resident family.
6. The lease will be signed by the head, spouse, and all other adult members of the household accepted as a resident family and by the Executive Director or other authorized representative of CMHA, prior to actual admission. [24 CFR § 966.4 (p)]
7. If a resident transfers from one CMHA unit to another, a new lease will be executed for the dwelling into which the family moves. [24 CFR § 966.4 (c)(3)] All requests for transfers must be submitted first to the Property Manager who will then verify the validity of the request.
8. If at any time during the life of the lease agreement, a change in the resident's status results in the need for changing or amending any provision of the lease, either:

- a. A new lease agreement will be executed, or
 - b. A Notice of Rent Adjustment will be executed, or
 - c. An appropriate rider will be prepared and made a part of the existing lease, or appropriate insertions made within the lease. All copies of such riders or insertions are to be dated and signed by the Resident and by the Executive Director or other authorized representative of CMHA. [24 CFR § 966.4 (o)]
9. Only those persons listed on the most recent certification form will be permitted to occupy a dwelling unit. [24 CFR §§ 960.209 (b) and 966.4 9 (a) (2)] Except for natural births to family members, any family seeking to add a new member must request approval in writing prior to the new member occupying the unit. [24 CFR § 966.4 (f)(3) & (c)(2)}
 10. Additions to the household — Following receipt of a family’s request for approval, CMHA will conduct a pre-admission screening of the proposed new member. Only new members approved by CMHA following the screening process will be added to the household. The results of screening will be used to determine whether or not to admit the new member. Children born to a family member, children under the age below which Juvenile Justice records are not made available who are adopted by a family member or who are added through a kinship care arrangement are exempt from the pre-admission screening process. The exemption age specified in this paragraph is subject to change should the State or locality modify its laws concerning the availability of police or court records for juvenile offenders.
 11. Examples of situations where the addition of a family member is subject to screening are:
 - a. Resident plans to be married and files a request to add the new spouse to the lease;
 - b. Resident is awarded custody of a child over the age for which juvenile justice records are available;
 - c. Resident desires to add a new family member to the lease, employs a live-in aide, or take in a fostered child(ren).
 - d. A unit is occupied by a remaining family member(s) under age 18 (and not an emancipated minor) and an adult, not a part of the original household, requests permission to take over as the head of the household.
 12. Residents who fail to notify CMHA of additions to the household are in violation of the lease. Residents who permit persons to join the household without undergoing screening are also in violation of the lease. Such persons will be considered unauthorized occupants by CMHA and the entire household will be subject to eviction. [24 CFR § 966.4 (f)(3)]

13. Family members over age 18 who move from the dwelling unit to establish new households will be removed from the lease. [24 CFR § 966.4 (f)(3)] The resident has the responsibility to report the move-out within 30 calendar days of its occurrence. These individuals may not be readmitted to the unit and must apply as a new applicant household for placement on the waiting list (subject to applicable income limits, preferences, resident selection, and screening requirements). Medical hardship, or other extenuating circumstances will be considered by CMHA in making determinations under this paragraph.
14. Visitors may be permitted in a dwelling unit, provided they are reported to the Manager within 72 hours of their arrival or prior thereto. Visits not exceeding 30 calendar days in one year may be authorized by the manager. Visits of more than 30 calendar days will not be authorized. Visitors remaining beyond this period will be considered trespassers and the head of the household will be guilty of a breach of the lease.
15. In accordance with the lease, roomers and lodgers will not be permitted to occupy a dwelling unit, nor will they be permitted to move in with any family occupying a dwelling unit. Subletting the unit is not permissible. Violation of this provision is ground for termination of the lease. [24 CFR § 966.4 (f) (2)]
16. A resident will not be given permission to allow a former resident of CMHA who has been evicted to occupy the unit for any period of time. Violation of this requirement is ground for termination of the lease.

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

1. It is CMHA's policy that transfers will be made without regard to race, sex, sexual orientation, color, religion, national origin, or familial status. Residents can be transferred to accommodate a disability. (Required, 24 CFR § 100.5)
2. Residents will not be transferred to a dwelling unit of equal size within a site or between sites except to alleviate hardship of the resident or other undesirable conditions as determined by the Executive Director or designee.
3. CMHA has four types of transfers: Emergency, Administrative (Category 1), Administrative (Category 2), and Incentive.
4. Resident Transfer Criteria:
 - a. Emergency Transfers are permitted when the unit or building conditions pose an immediate threat to resident life, health or safety, as determined by CMHA. Emergency transfers within sites or

between sites may be made to repair unit defects hazardous to life, health, or safety, alleviate verified medical problems of a life threatening nature.

- b. Administrative transfers - Category 1: includes transfers to remove residents to alleviate verified medical problems of a serious nature, permit modernization of units, or permit a family that requires a unit with accessible features to occupy such a unit.
 - i. Requests for medical transfers under Category 1 will be made to the manager. The Resident will provide the manager with the necessary verification and/or documentation to substantiate the need for a medical transfer. Whenever feasible, transfers will be made within a resident's area (e.g., moving a person with mobility problems to a unit with accessible features). Transfers will be routed to the 504 Officer when the transfer request is for a 504 handicap accommodation that requires relocation or major accessibility/ accommodation.
- c. Category 2 administrative transfers will be processed with new admissions. The ratio is discretionary and will be reviewed at least annually to determine its effects on vacancy. Based on recommendations from staff, the Executive Director may authorize a change in the ratio or suspend the processing of this type of transfer.
 - i. Transfers to correct occupancy standards may be recommended at time of reexamination or interim redetermination. This is the only method used to determine over/under housed status.
 - ii. Residents in an over/under housed status will be advised in their 30-day "Notice of Result of Reexamination" that a transfer is recommended and that the family has been placed on the transfer list. Interviewers will record transfer recommendations in duplicate for each manager affected by the transfer.
 - iii. Split-family transfers will be processed under this category of administrative transfers. Families that split into 2 "new" households may be transferred to two different units or a portion of the "old" household may be transferred to a single unit depending on family circumstances and unit availability. Options for split-family transfers will be considered in order to minimize the impact on vacant units. Such transfers will be made in a manner that best benefits CMHA.
- d. A good record is required for a transfer — residents will be considered for transfers if they:
 - i. have not engaged in criminal activity that threatens the health and safety of residents and staff;
 - ii. do not owe back rent or other charges, or evidence a pattern of late payment; or

- iii. meet reasonable housekeeping standards and have no housekeeping lease violations.
 - e. Without a determination of exception the following policy applies to transfers:
 - i. If back rent is owed the resident will not be transferred until back rent is paid in full.
 - ii. A resident with housekeeping standards violations will not be transferred until he or she passes a follow-up housekeeping inspection.
 - iii. Transfers may be refused when fire damage to a unit is caused by a resident and/or members and guests of resident family.
 - f. Incentive Transfers - CMHA may elect to occupy recently modernized and scattered site units through incentive transfers. No applicants will be admitted directly to scattered site units. Depending on CMHA's vacant unit status, modernized units will be filled with incentive transfers, new applicants, or a combination of both. CMHA reserves the right to fill modernization units in a manner that has the least impact on vacant units.
 - g. Resident requests for incentive transfers should be made to the Housing Manager. Managers may also recommend a resident for an incentive transfer. In order for a resident to be considered for an incentive transfer the following conditions must be met:
 - i. Residency in a CMHA development for a least five (5) years.
 - ii. No repayment agreement or unpaid balance at any time in the past two (2) years.
 - iii. No history of disturbances that resulted in lease violations or violence toward staff or neighbors as indicated by notices of lease violation in the applicant's file.
 - iv. A good housekeeping record.
 - v. Cost of transfers - Residents will bear the cost of transfers to correct occupancy standards, however, where there is a hardship due to health, disability, or other factors, the manager may recommend that families be reimbursed their out-of-pocket expenses for an occupancy standard transfer. Transfers requested or required by CMHA will be paid for by HA.
 - vi. The Manager has the responsibility to obtain and document all pertinent information relative to a request for transfer.

5. Resident Transfers, Administrative Requirements

- a. Transfers will be processed at a central location in accordance with

CMHA Procedure on transfers. A central transfer list will be maintained.

- b. Regional managers will review all transfer requests and forward the request to central office. At central office transfers must be approved by the Executive Director or designee. Residents approved for transfer are subject to eligibility and suitability requirements set forth in this Policy.
- c. Residents will receive one offer of a transfer. Refusal of that offer without good cause will result in the removal of the household from the transfer list. The good cause standards applicable to new admissions will apply to transfers.

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

A. Eligibility for Continued Occupancy

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

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

B. Remaining Family Members and Prior Debt

1. As a party to the lease, remaining family members (other than the head or spouse) 18 years of age or older will be responsible for arrearage incurred by the former head or spouse. CMHA will not hold remaining family members (other than the head or spouse) responsible for any portion of the arrearage incurred prior to the remaining member attaining age 18.
2. Remaining family members under age 18 will not be held responsible for the rent arrearage incurred by the former head of household.

C. Periodic Reexamination.

1. Regular reexamination. CMHA will, at least once a year, reexamine the anticipated incomes of all resident families. [24 CFR § 960.209 (a)]

2. Special Reexamination. When it is not possible to estimate projected family income with any degree of accuracy at the time of admission or regular reexamination, a temporary determination will be made with respect to income and a special reexamination will be scheduled every 60 days until a reasonably accurate estimate of income can be made. The resident will be notified in advance as to the date for the special reexamination(s).
3. Persons reporting zero income will have their circumstances examined every 60 days until they have a stable income. Persons claiming zero income will also be asked to verify how they are meeting their living expenses.
4. Reexamination Procedures
 - a. At the time of reexamination, all adult members of the household will be required to sign forms required by HUD.
 - b. Employment, income, allowances, Social Security numbers, and such other data as are deemed necessary will be verified via third party, and all verified findings will be documented and filed in the resident's folder. [24 CFR § 960.206]
 - c. Verified information will be analyzed and a determination made with respect to:
 - i. Eligibility of the resident as a family or as the remaining member of a family:
 - ii. Unit size required for the family;
 - iii. Rent the family should pay.
 - d. Income will be computed in accordance with the definitions and procedures set forth in this policy. [24 CFR § 913]
 - e. Families failing to respond to the initial reexamination appointment will be issued a final appointment within the same month. Failure to respond to the final request will result in the family being sent a notice of lease violation and referred to the Housing Manager for failure to comply with the terms and conditions of occupancy required by the lease. Failure to comply will result in termination of the lease. [24 CFR § 966.4 (c)(2)]
5. Action Following Reexamination
 - a. If there is any change in rent, the lease will be amended, or a new lease will be executed, or a Notice of Rent Adjustment will be issued. [24 CFR § 966.4 (c) & (o)]
 - b. If any change in the unit size is required, the resident will be placed on a transfer list in accordance with the transfer criteria described earlier

in this policy and moved to an appropriate unit when one becomes available. [24 CFR § 966.4 (c)(3)]

- c. CMHA will not commence eviction proceedings, or refuse to renew a lease, based upon the income of the resident family unless (1) it has identified, for possible rental by the family, a unit of decent, safe and sanitary housing of suitable size available at a rent not exceeding thirty percent (30%) of income as defined by the Authority for the purpose of determining rents; or (2) it is required to do so by local law. Pending their removal from the project, such families are to be charged rents calculated in accordance with the formula selected for Total Tenant Payment described in Section VIII and X of these policies. [24 CFR § 960.210] Abuses regarding excess rental assistance, such as deficiencies of payments may be reported to credit bureaus.
6. Family disclosure of HUD notice concerning family income - a PH family must provide any notifications by HUD regarding family income to CMHA [24 CFR § 5.240]. Notification must be provided within 10 days of receipt thereof.
- a. CMHA will verify the information received and make adjustments as required to income and/ or rent.

VII. INTERIM RENT ADJUSTMENTS:

A. Rent Adjustments

- 1. Residents must report all changes in family composition or status to the housing manager within 10 calendar days of the occurrence. Failure to report within the 10 calendar days may result in a retroactive rent charge.
- 2. All increases in income must be reported within 10 days of occurrence. Increases in gross income that will result in an annual increase at or above \$1000 will be subject to an interim rent increase. Not all changes in family income between reexaminations will result in a rent change. CMHA will process interim changes in rent in accordance with the chart below:

INCOME/ ASSET CHANGE	HA ACTION ON RENT CHANGES
a. Decrease in income for any reason, except for decrease that lasts less than 30 days. [24 CFR § 913.107] and gross annual increases at or above \$1000	HA will process an interim adjustment in rent. An interim adjustment will not be processed if the decrease will last less than 30 days or Public Assistance was decreased and/ or terminated due to fraud or non-compliance with Program Rules.
b. Increase in earned income of a current household member less than \$1000.	HA will defer the increase to the next regular reexamination unless income increases due to the end of exclusion period being met.

c. Increase in unearned income.	HA will defer the increase to the next regular reexamination unless income increased due to the end of an income exclusion period being met.
d. Increase in income because a person with income (from any source) joins the household.	HA will process an interim adjustment in rent.

- e. Residents that take work to obtain the deferral of income and have a pattern of employment termination without good cause to avoid being employed at the next regular reexamination will be considered as misrepresenting the facts and subject to retroactive increases as described in ¶ C. below. Residents with seasonal or part-time employment of a cyclical nature will be asked for third party documentation of the circumstances of their employment including start and ending dates, in addition to verification of unemployment and/or assistance payments.
- f. CMHA will process an interim adjustment in rent if it is found that the resident at an annual or interim reexamination has misrepresented the facts upon which the rent is based so that the rent the Resident is paying is less than the rent that he or she should have been charged. CMHA will apply any increase in rent retroactive to the first of the month following the month in which the misrepresentation occurred.

3. Complete justification and verification of the circumstances applicable to rent adjustments must be documented by the resident and verified and approved by the Executive Director or his/her designee. [24 CFR § 960.206]
4. CMHA will process interim adjustments in rent in accordance with the following policy:
 - a. When a decrease in income is documented, and the Authority receives confirmation that the decrease will last less than 30-days, an interim adjustment will not be processed.
 - b. Residents report and provide documentation of decreases in income that are expected to last more than 30 days will have an interim adjustment processed.
5. Residents granted a reduction in rent under these provisions may be required to report for special reexamination at intervals determined by the Housing Manager. Reporting is required until the circumstances cease or until it is time for the next regularly scheduled reexamination, whichever occurs first. If family income increases during this time, the rent will be increased accordingly. A fully documented record of the circumstances and decisions will be included in the resident's folder.

B. Effective Date of Adjustments

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

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

C. Failure to Report Accurate Information

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

1. Clients with sporadic income may be considered as misrepresenting facts if termination with "good cause" cannot be verified and/ or documented inactivity with temporary employment due to the client's refusal or non-acceptance of available assignment(s).

D. Exceptions to Minimum Rent - SPECIAL FINANCIAL HARDSHIP REVIEW

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

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

¹ Definition of Family - Two or more persons (with or without children) regularly living together, related by blood, marriage, adoption, guardianship or operation of law who will live together in HA housing; OR two or more persons who are not so related, but are regularly living together, can verify shared income or resources who will live together in HA housing. *The term family also includes: Elderly family, Near elderly family, disabled family, displaced person, single person, the remaining*

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

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

member of a tenant family, a foster care arrangement, or a kinship care arrangement (. Other persons, including members temporarily absent (e.g. a child temporarily placed in foster care or a student temporarily away at college), may be considered a part of the applicant family's household if they are living or will live regularly with the family. [24 CFR §§912 and 960] Live-in Aides may also be considered part of the applicant family's household. However, live-in aides are not considered family members and have no rights of tenancy or continued occupancy.

occurred.

- iii. Proper verification of resident claims are required.
 - The Federal, State, or Local Government must acknowledge and verify all claims for long-term financial hardship due to a disability. In addition to verification supporting the loss or decrease of income due to the disability.
 - b. The PHA resident household may request a grievance hearing if they contest the determination that has been made in accordance with CMHA Grievance Procedure and is exempt from any escrow deposit as it relates to the minimum rent hardship request.
7. Effective date of Hardship Determination will be the month following the receipt of documented hardship circumstance(s).

VIII. LEASE TERMINATION PROCEDURES

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

A. Notice Requirements

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

B. Record keeping Requirements

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

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

4. Date and method of notifying the resident;

IX. UTILITIES

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

A. Resident-Paid Utilities

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

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

B. Excess Utility Charges

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

X. FLAT RENTS

- A. Flat rent will be an adjusted HA rent at or below Fair Market Rent (FMR) for Franklin County based on bedroom size. Utility allowances are not applicable.

1. Rents are set by the HA based on the rental value of the unit.
 - a. Location, amenities, age, market sources, and other comparable

information will be considered in determining the flat rent determination.

- B. Annually a choice will be offered to residents to select 30% of adjusted gross income or flat rent. Applicability of the annual choice for Flat Rent will be to those families admitted or subject to recertification after October 1, 1999.
 - 1. Selection of a Flat Rent or 30% of adjusted gross income will be made at least 30 days prior to the effective date of rent. Procedural Exhibit 14.
 - a. The client will be notified of the Flat Rent and the 30% of adjusted gross income via letter. The client will have 10 days to return their selection of Flat Rent from the date of the letter.
 - b. If the family fails to choose a Flat Rent within the required time, the TTP will be calculated at 30% of adjusted gross income.
 - 2. If the resident chooses to dispute the rent determination, a request for a Grievance may be made in accordance with CMHA Policy on Resident Grievances.

C. Flat Rent Financial Hardship

- 1. Certain exceptions to Flat Rent, between annual selection of Flat Rent and Income Based Rent, have been established for households whose circumstances have changed effecting income that may prevent them from paying Flat Rent. Exceptions must be determined to be of a long term basis, seasonal fluctuations, sporadic income, and other unpredictable income changes will not be considered. Exceptions are as follows:
 - a. If the family experienced a decrease in income due to loss of or reduction greater then \$1000 with respect to employment.
 - b. If the family experienced a reduction or loss of earnings or other assistance.
 - c. If the family has incurred increased applicable medical, child care, transportation, or education expense.
- 2. Subject to the 90 day provision outlined in VII. D. 6. a. of this Policy.

XI. RESIDENT GRIEVANCES

A. Introduction

- 1. Purpose and Availability
 - a. The purpose of this MANUAL is to set forth the requirements, standards, criteria and process for the HA's Grievance Procedure.

The Grievance Procedure is a means through which a Resident of low-rent Public Housing may bring his or her grievance concerning his or her residency before the Authority and, if applicable, before a fair, impartial and disinterested Hearing Officer.

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

- b. Representation - The Grievance Procedure is designed to be an efficient, effective and accessible forum for the prompt resolution of a resident's grievance. In order for the Grievance Procedure to operate as designed, resident representation is preferred and encouraged at grievance hearings. The Columbus Legal Aid Society (hereinafter, "Legal Aid") is available to perform advocacy for residents and applicant at both informal and formal grievance hearings. Residents desiring to use the Grievance Procedure to resolve disputes with the HA are strongly urged to contact Legal Aid by telephone at (614) 224-8374 or in person at 40 West Gay Street, Columbus, Ohio 43215.
- c. Availability - A copy of the Grievance Procedure shall be available for public inspection at the Central Office, in the office of the Director of Housing Management and Services, the Applications Office and all Management Offices; and be furnished to Applicants, Residents, resident organizations, Legal Aid, the Columbus Urban League, the Columbus Branch of the NAACP, and any other person or community group upon request within a reasonable time and for a reasonable fee to cover the copying costs of the HA. {24 CFR § 966.52 (d)}

B. Applicability and Scope

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

- 1. Because HUD has issued a due process determination that the law of the State of Ohio requires that Tenant be given the opportunity for a hearing in court which provides the basic elements of due process (as defined hereinafter) before eviction from the dwelling unit, the Grievance Procedure shall not be applicable to any termination of tenancy or eviction that involves:

- a. Any criminal activity that threatens the health, safety, or right to peaceful enjoyment of CMHA property of other residents or employees of CMHA, or
 - b. Any drug-related criminal activity on or near CMHA property.
2. CMHA's Grievance Procedure shall not be applicable to disputes between Residents not involving CMHA or to class grievances. The grievance procedure is not intended as a forum for initiating or negotiating policy changes between a group or groups of Residents and CMHA's Board of commissioners.
 - a. CMHA's Grievance Procedure shall not be applicable to disputes arising from CMHA's denial of an Applicant's request for a Local Preference (24 CFR § 960.211 (k)).
3. The Grievance Procedure, when appropriate, shall be applicable to, but not limited to the following:
 - a. Disputes over the amount of rent due under the lease for the leased premises.
 - b. Charges levied by the HA due to damages to the HA's property allegedly caused by the Resident or Resident household members, guests, invitees; and
 - c. Conditions in the Resident's dwelling unit and/ or the need for repairs.

C. Construction of text and operation

Whenever the context of this MANUAL so requires:

1. Words and phrases shall be read in the context and construed according to the rules of grammar and common usage. Words and phrases that have acquired a technical or particular meaning shall be read and construed accordingly;
 - a. "And" may be read "or", and "or" may be read "and" if the sense so requires it; and
 - b. The singular includes the plural, and the plural includes the singular. Words of one gender include the other genders. Words in the present tense include the future tense. If there is a conflict between figures and words in expressing a number, the words shall govern. Any modification to this Grievance Procedure shall be prospective in operation and application unless otherwise expressly made retrospective.

- i. If any provisions of a section of the Grievance Procedure or the application thereof to any person or circumstance is held invalid, the invalidity does not affect other provisions or effect without the invalid provision or application, and to this and the provisions are severable.
- ii. Any reference to any portion of the Ohio Revised Code (RC) Or the Code of Federal Regulations (CFR) applies to all re-enactments or amendments thereof.
- iii. This Grievance Procedure is incorporated by reference in all Resident Leases. Any changes proposed in this Grievance Procedure must provide for at least thirty (30) days notice to Residents and resident organizations, setting forth the proposed changes and providing an opportunity to present written comments. Comments submitted shall be considered by CMHA before any revisions are made to the Grievance Procedure (24 CFR § 966.52 (d)).

D. Definitions

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

1. Applicant - anyone who make application to become a resident of CMHA or a participant in CMHA's Section 8 or Homeownership Programs.
2. Application - any written request from any person to CMHA to become a resident of CMHA or a participant in CMHA's Section 8 or Homeownership Programs.
3. Authority - CMHA
4. Authority Property - any real or personal property owned or managed by CMHA
5. Board of Commissioners or Commissioners - the duly appointed Commissioners of CMHA
6. Day or Days - a calendar day or calendar days, inclusive of Saturday, Sunday, and legal holidays.
7. Decision - the Hearing Officer's written findings and conclusions, and reasons therefore, relative to Resident's or Applicant's Grievance.
8. Determination - the decision of the CMHA Board of Commissioners made pursuant to 24 CFR § 955.57 (b).

9. Employee - any person employed by the Authority or any agent or representative of the Authority.
10. Eviction or Forcible Entry and Detainer Action - the Court ordered dispossession of a Resident from the leased premises as a result of a Court judgement granting restitution of the leased premises to CMHA.
11. Grievance - any dispute which a Resident may have with respect to Authority action or failure to act in accordance with the individual Resident's lease or Authority regulations which affect the individual Resident's rights, duties, welfare or status.
12. Grievance Hearing shall mean a session where a Resident and the Authority present information concerning a Resident grievance to an impartial Hearing Officer and based on the information presented and the applicable law, regulations and rules, a decision is rendered.
13. Hearing Officer - a person selected by CMHA in accordance with 24 CFR § 966.55 and this Grievance Procedure to hear Resident grievances and render a decision with respect thereto.
14. Housing Community Management Office - the on-site Authority Management Office for the Housing Community in which a Resident resides.
15. HUD - the Department of Housing and Urban Development.
16. Informal Settlement Conference - the conference held between the Housing Community Manager and the Resident to informally discuss and settle the Resident's grievance.
17. Lease or Dwelling Lease - the written contractual agreement between the Authority and the Resident that sets forth the rights, responsibility and obligations of each relating to the use and occupancy by Resident of property (including real and personal property) owned and/ or managed by CMHA.
18. Leased Premises - the unit, dwelling unit, apartment or property (including real and personal property) leased or rented to Resident pursuant to the lease with CMHA.
19. Resident Organization - an organization of residents, incorporated or unincorporated, who reside in CMHA owned or administered property.
20. Rule - regulations, codes of conduct and policies.
21. Resident - the adult person (or persons) other than a Live-In Aide: a) who resides in the unit, and who executed the lease with CMHA as lessee of the

dwelling unit, or if no such person now resides in the unit, b) who resides in the unit, and who is the remaining head of the household of the Resident family residing in the dwelling unit.

22. Written or in Writing - any representation in words, letters, symbols, or figures.

E. Effective date

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

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

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

1. Posting Exhibit 10 (attached hereto) in a conspicuous place in each Housing Community Management Office, the Applications Office and the Authority Central Office; and
2. By advising each Applicant and Resident to read Exhibit 10. Further, if a Resident has made several complaints about some problem but has not specifically requested an Informal Settlement Conference (hereinafter sometimes referred to as Conference), it is desirable, but not mandatory, that the Housing Community manager inform the Resident of the Grievance Procedure and the possibility of settlement under it.

G. Grievance Procedures

1. Informal Settlement of Resident's Grievance

- a. If the Resident chooses to resolve his/ her grievance through this Grievance Procedure, he shall personally present, either orally or in writing, his grievance to the Office of the Director of Housing Management and Services at CMHA's Central Office or to the Management Office of the Housing Community in which he resides so that the grievance may be discussed informally and possibly settled at an Informal Settlement Conference without a grievance hearing (24 CFR § 966.54).
- b. Grievances received by the Office of the Director of Housing Management and Services at CMHA's Central Office will be referred to the Resident's Housing Community Manager.

- c. The Resident shall present his grievance by 4:00 p.m. on or before the Thirtieth(30th) day from the date that the dispute or problem originally arose (except in the case where CMHA has issued a Proposed Termination of Lease or Homeownership Agreement). 24 CFR § 966.50.
 - i. When CMHA’s Central Office or the Resident’s Housing Community Management Office is closed to the public for the entire day and such day is the thirtieth (30th) and final day for the Resident to present his grievance or before 4:00 p.m. of such day, then the Resident may present his grievance on the next succeeding day which is not a Saturday, Sunday or legal holiday recognized by the Authority.
 - ii. If the Resident does not timely present his grievance, he shall not be entitled to an Informal Settlement Conference or Grievance Hearing under this Grievance Procedure unless he can show good cause for his failure to timely present the same. The Director of Housing Management and Services of the Authority or his designee shall determine whether the Resident has good cause for failing to timely present his grievance.
 - d. If the Applicant chooses to dispute the reason for rejection of his/ her application, he shall personally present, either orally or in writing, his grievance to the Office of the Director of Public Housing at CMHA’s Central Office so that the grievance may be discussed informally and possibly settled at an Informal Settlement Conference without a grievance hearing.
 - i. The Applicant shall present his grievance by 4:00 p.m. on or before the Thirtieth (30th) day from the date that the dispute originally arose except for those excluded from the Grievance process.
2. As soon as the grievance is received, it will be reviewed by the Resident’s Housing Community Manager who will ascertain whether the exclusions set forth in the above apply to the grievance.
- a. Should any one of the exclusions apply, the complainant will be notified in writing within a reasonable time that the matter raised is not subject to CMHA’s grievance procedure, with the reason therefore.
 - b. If none of the exclusions apply, the Housing Community Manager shall schedule an Informal Settlement Conference with the Resident. Exhibit 11.
 - c. Under no circumstance shall the Housing Community Manager

schedule a Conference within three (3) days from the date that the Resident's grievance was received or fail to schedule a Conference within ten (10) day time period up to an additional six (6) days on any basis it considers just cause for a reasonable delay, including reasonable delays requested by the Resident.

3. Purpose of the Informal Settlement Conference

- a. To amicably resolve the Resident's grievance without resorting to an Grievance Hearing.
- b. The Housing Community Manager and the Resident should extensively discuss the grievance, the possible means of resolution, and reach a decision satisfactory to both parties, if possible.
- c. Serious effort by the Authority and the Resident shall be made to resolve the grievance at this level (24 CFR § 966.54).
- d. The Conference is not an adversarial proceeding and therefore, neither CMHA nor the Resident may have any legal representation at such conference. However, both CMHA and the Resident may present witnesses at the Conference.
- e. Either the Authority or the Resident, or both may record the Informal Settlement Conference with an electronic recording device. Any such recording shall be done at the expense of and remain the property of the party making such recording. Prior to any participant activating any recording device, such participant shall inform all other participants of his intent to record the Informal Settlement Conference. If any participant objects, no one may record the Conference.
- f. The Housing Community Manager shall conduct the Conference in a fair and impartial manner. The Resident shall be given full opportunity to discuss his grievance. However, the Housing Community Manager may limit the Conference to thirty (30) minutes. Additional time may be allowed at the discretion of the Housing Community Manager.
- g. If at any time during the Conference, either the Resident or any other participant becomes disruptive, unruly, combative, or otherwise engages in violent, threatening or unacceptable conduct, the Housing Community Manager may terminate the Conference and render a decision in the form of the Summary of Informal Settlement Conference (hereinafter sometimes referred to as Summary) based upon the information adduced up to the time that the Conference was terminated. Exhibit 12. If the Housing Community Manager

terminates the Conference, he shall state this fact and the reasons therefore in his Summary.

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

H. Procedures for Resident to Obtain a Grievance Hearing

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

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

1. By completing the Grievance Hearing Request Form (Exhibit 13) or a written request for a hearing and setting forth therein the reasons for his dissatisfaction and/ or grievance and the action or relief sought (24 CFR § 966.55 (A)(1) and (2)); and
2. By delivering or mailing a copy of the Summary and the completed Grievance Hearing Request Form or written request for a hearing to:
 - a. The Resident's Housing Community Management Office; or
 - b. The Columbus Metropolitan Housing Authority, Attention: Director of Housing Management and Services, 960 East Fifth Avenue, Columbus, Ohio 43201.

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

3. By completing the Grievance Hearing Request Form (Exhibit 13) or a written request for a hearing and setting forth therein the reasons for his dissatisfaction and/ or grievance and the action or relief sought (24 CFR § 966.55 (A)(1) and (2); and
4. By delivering or mailing a copy of the Summary and the completed Grievance Hearing Request Form or written request for a hearing to:
 - a. The Columbus Metropolitan Housing Authority, Attention: Admissions & Occupancy , 960 East Fifth Avenue, Columbus, Ohio 43201.

In either event, the copy of the Summary and the completed Grievance Hearing Request Form or written request must be received by either the Housing Community Management Office or the Central Office of the Authority within thirty (30) days after it was mailed or hand-delivered to the Resident²

3. The Resident's failure to attach a copy of the Summary to the Grievance Hearing Request Form or to any written request for a hearing shall not be a reason to deny the Resident's request for a hearing.
4. If the complainant requests a Grievance hearing in a proper and timely manner, CMHA shall schedule a hearing on the grievance at the earliest time possible but in no case later than twenty (20) days (except for good cause shown) after CMHA receives the written request for hearing.
 - a. If the complainant fails to request a hearing within thirty (30) days after the summary was mailed or hand-delivered to him, CMHA's Summary rendered as a result of the Informal Settlement Conference becomes final and CMHA is not obligated to offer the complainant a hearing unless the complainant can show good cause why he failed to proceed in accordance with this procedure (24 CFR § 966.55 (c) and (d). Also, the Resident's failure to request a grievance hearing does not affect his right to contest CMHA's decisions in a court hearing (24 CFR § 966.55 (c).

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

I. Selection of Hearing Officer for Resident Grievances

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

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

J. Escrow Deposit Required for a Hearing Involving Rent

1. Pursuant to 24 CFR § 966.55 (e), before a hearing is scheduled in any grievance involving the amount of rent which CMHA claims is due under the Resident's lease, the complainant shall pay to CMHA an amount equal to the rent due and payable as the first of the month preceding the month in which the act or failure to act took place.

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

K. Notice of Hearing to all Parties

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

L. Procedures Governing the Hearing

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

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

interested party may purchase a copy of such transcript (24 CFR § 966.56 (g)).

8. CMHA must provide reasonable accommodation for persons with disabilities to participate in the hearing. Reasonable accommodation may include qualified sign language interpreters, readers, accessible locations, or attendants. If the complainant is visually impaired, any notice to the complainant which is required under this procedure must be in an accessible format (24 CFR § 966.56 (h)).
9. Decision of the Hearing Officer
 - a. The Hearing Officer shall prepare and issue a written decision on the complaint within fifteen (15) days after the hearing.
 - b. The decision must state the conclusions, reasons, and otherwise comply with the decisional requirements set forth in 24 CFR § 966.56 and 24 CFR § 966.57, specifically including:
 - i. Whether the complainant is entitled to the relief sought and the reasons upon which such a conclusion is based; and
 - ii. Whether CMHA sustained the burden of justifying its actions or failure to act, together with the reasons upon which such a conclusion is based.
 - c. A copy of the decision shall be sent to the Complainant and CMHA.
 - i. CMHA shall retain a copy of the decision in the Complainant's file.
 - ii. A copy of the decision with all names, and identifying references deleted, shall also be maintained on file by CMHA and made available for inspection by a prospective complainant, his representative, or the Hearing Officer (24 CFR § 966.57 (a)).
 - d. Pursuant to 24 CFR § 966.57 (b), the decision of the Hearing Officer shall be binding on CMHA which shall take all actions, or refrain from any actions, necessary to carry out the decision unless CMHA's Board of Commissioners determines within thirty (30) days, and promptly notifies the complainant of its Determination that:
 - i. The grievance does not concern CMHA action or failure to act in accordance with or involving the Complainant's lease or CMHA regulations, with adversely affect the Complainant's rights, duties, welfare or status; or

- ii. The decision of the Hearing Officer is contrary to applicable Federal, State or Local law, HUD Regulations, or requirements of the annual contributions contract between HUD and CMHA.
- e. A decision by the Hearing Officer or Board of Commissioners in favor of CMHA or which denies the relief requested by the Complainant in whole or in part shall not constitute a waiver or, not affect in any way, the rights of the Complainant to a trial or judicial review in any court proceedings which may be brought in the matter later (24 CFR § 966.57 (c)).

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

A. Annual Income (24 CFR 913.106)

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

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

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

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

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

5. Payment in lieu of earnings, such as unemployment and disability compensation, worker's compensation, and severance pay.
6. All welfare assistance payments received by or on behalf of any family member. See 24 CFR § 913.106 (b)(6) for welfare rules applicable to "as-paid" States;
7. Periodic and determinable allowances, such as alimony and child support payments, and regular cash contributions or gifts received from persons not residing in the dwelling;
8. All regular pay, special pay, and allowances of a family member in the Armed Forces. (See paragraph B. 7. below concerning hazard pay for exposure to hostile fire.)

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

Annual Income does not include the following:

1. Income from the employment of children (including fostered children) under the age of 18 years;
2. Payments received for the care of foster children or foster adults (usually individuals with disabilities, unrelated to the resident family, who are unable to live alone);
3. Lump sum additions to family assets, such as inheritances, insurance payments (including payments under health, and accident insurance, and workers' compensation) capital gains, and settlement for personal property losses; (but see paragraphs 4 and 5 above if the payments are or will be periodic in nature);
4. Amounts received by the family that are specifically for, or in reimbursement of the cost of medical expenses for any family member;
5. Income of a live-in aide, provided the person meets the definition of a live-in aide;
6. The full amount of student financial assistance paid directly to the student or the educational institution. (FR Vol. 60, #65/ 5 April 1995)

7. The special pay to a family member serving in the Armed Forces who is exposed to hostile fire;
8. Amounts received under HUD funded training programs (e.g. Step-up program; excludes stipends, wages, transportation payments, child care vouchers, etc. for the duration of the training);
 - a. Amounts received by a person with disabilities that are disregarded for a limited time for purposes of Supplemental Security Income and benefits that are set aside for use under a Plan to Attain Self-Sufficiency (PASS);
 - b. Amounts received by a participant in other publicly assisted programs which are specifically for, or in reimbursement of, out-of-pocket expenses incurred (special equipment, transportation, child care, etc.) to allow participation in a specific program ;
 - c. A resident services stipend. A resident services stipend is a modest amount (not to exceed \$200/month) received by a public housing resident for performing a service for the PHA, on a part-time basis, that enhances the quality of life in public housing. Such services may include but are not limited to, fire patrol, hall monitoring, lawn maintenance, and resident initiatives' coordination. No resident may receive more than one such stipend during the same period of time. (FR Vol. 60, #65/ 5 April 1995)
 - d. Compensation from State or local employment training programs and training of family members as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for a limited period as determined in advance by the PHA. (FR Vol. 60, #65/ 5 April 1995)
9. Temporary, non-recurring, or sporadic income (including gifts); or
10. For all initial determinations and reexamination of income on or after 23 April 1993, reparation payments paid by foreign governments pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;
11. Earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of the household and spouse); (FR Vol. 60, #65/ 5 April 1995)
12. Adoption assistance payments in excess of \$480 per adopted child; (FR Vol. 60, #65/ 5 April 1995)
13. Applicability of Exclusion:

- a. The earnings and benefits to any resident resulting from the participation in a program providing employment training and supportive services in accordance with the Family Support Act of 1988 (42 U.S.C. 1437 et seq.), OR any comparable Federal, State or local law during the exclusion period. (FR Vol. 60, #65/ 5 April 1995) For purposes of this paragraph the following definitions apply:
 - i. Comparable Federal, State or local law means a program providing employment training and supportive services that: (a) is authorized by a Federal, State or local law; (b) is funded by the Federal, State or local government; (c) is operated or administered by a public agency; and (d) has as its objective to assist participants in acquiring employment skills.
 - ii. Exclusion period means the period during which the resident participates in a program described in this section PLUS 12 months from the date the resident begins the first job acquired by the resident after completion of such programs that IS NOT funded by public housing assistance under the U.S. Housing Act of 1937 (42 U.S.C.1437 et seq.). An additional 12 month phase in, after the initial 12 months (maximum of 48 months per adult household member), including 50% of the earned income for the participant will be utilized in determining rent. If the resident is terminated from employment without good cause, the exclusion period will end [CFR 960.255(a)].
 - iii. Earnings and benefits mean the incremental earnings and benefits resulting from a qualifying employment training program or subsequent job.
 - iv. Client whose annual income increases as a result of employment of a family member who was unemployed for one or more years previous to employment.
 - v. Client whose annual income increases as a result of new employment or earnings within 6 months and \$500 accrued during the 6 month period after receiving welfare 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.
- b. The following is a list of benefits excluded by other Federal Statute as of 3 August 1993 [FR Vol. 58, #147] :
 - The value of the allotment provided to an eligible household for coupons under the Food Stamp Act of 1977 [7 USC 2017 (h)].
 - Payments to volunteers under the Domestic Volunteer Service Act of 1973 [42 USC 5044 (g), 5088].

Examples of programs under this Act include but are not limited to:

- *the Retired Senior Volunteer Program (RSVP), Foster Grandparent Program (FGP), Senior Companion Program (SCP), and the Older American Committee Service Program;*
- *National Volunteer Antipoverty Programs such as VISTA, Peace Corps, Service Learning Program, and Special Volunteer Programs;*
- *Small Business Administration Programs such as the National Volunteer Program to Assist Small Business and Promote Volunteer Service to Persons with Business Experience, Service Corps of Retired Executives (SCORE), and Active Corps of Executives (ACE).*
- Payments received under the Alaska Native Claims Settlement Act [43 USC 1626 (a)].
- Income derived from certain sub-marginal land of the United States that is held in trust for certain Indian tribes [(25 USC 459e)].
- Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program [42 USC 8624 (f)].
- Payments received under programs funded in whole or in part under the Job Training Partnership Act (29 USC. 1552 (b))
- Income derived from the disposition of funds of the Grand River Band of Ottawa Indians (Pub. L. 94-540, 90 Stat 2503-04);
- The first \$2000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the Court of Claims (25 USC. 1407-08), or from funds held in trust for an Indian Tribe by the Secretary of Interior [25 SC. 117b, 1407]; and
- Amounts of scholarships funded under Title IV of the Higher Education Act of 1965 including awards under the Federal work-study program or under the Bureau of Indian Affairs student assistance programs [20 USC 1087 uu].
- *Examples of Title IV programs include but are not limited to: Basic Educational Opportunity Grants (Pell Grants), Supplemental Opportunity Grants, State Student Incentive Grants, College Work Study, and Byrd Scholarships.*
- Payments received from programs funded under Title V of the Older Americans Act of 1965 [42 USC 3056 (f)].
- *Examples of programs under this act include but are not limited to: Senior Community Services Employment Program (CSEP), National Caucus Center on the Black Aged, National Urban League, Association National Pro Personas Mayores, National Council on Aging, American Association of Retired Persons, National Council on Senior Citizens, and Green Thumb.*
- Payments received after January 1, 1989 from the Agent Orange Settlement Fund or any other fund established in the In Re Orange

product liability litigation, M.D.L. No 381 (E.D.N.Y.)

- Payments received under the Maine Indian Claims Settlement Act of 1980 (Pub. L. 96-420, 94 Stat. 1785)
- The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990 (42 USC. 9858q)
- Earned income tax credit refund payments received on or after January 1, 1991 (26 USC. 32 (j)).

13.1 Required Verification:

- a. CMHA’s only choice is a written third party verification to substantiate applicant or resident income exclusion claims.

Applicants must cooperate fully in obtaining or providing the necessary

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

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

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

D. Adjusted Income (24 CFR 913.102)

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

For All Families

- 1. Child Care Expenses — A deduction of amounts anticipated to be paid by

the family for the care of children under 13 years of age for the period for which Annual Income is computed.

BUT ONLY when such care is necessary to enable a family member to be gainfully employed or to further his/her education. Amounts deducted must be un-reimbursed expenses and shall not exceed: (a) the amount of income earned by the family member released to work; or (b) an amount determined to be reasonable by CMHA when the expense is incurred to permit education.

2. Dependent Deduction — An exemption of \$480 for each member of the family residing in the household (other than the head of household, or spouse, Live-in Aide, or foster child) who is under eighteen years of age or who is eighteen years of age or older and disabled, handicapped, or a full-time student.
3. Handicapped Expenses — a deduction of un-reimbursed amounts paid for attendant care or auxiliary apparatus expenses for handicapped family members where such expenses are necessary to permit a family member(s), including the handicapped/disabled member, to be employed. In no event may the amount of the deduction exceed the employment income earned by the family member(s) freed to work.

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

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

For elderly and disabled families only:

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

Medical expenses include but are not limited to: services of physicians and other health care professionals, services of health care facilities, insurance premiums (including the cost of Medicare), prescription and non-prescription medicines, transportation to and from treatment, dental expenses, eyeglasses, hearing aids and batteries, attendant care (unrelated to employment of family members), and payments on accumulated medical

bills. To be considered by CMHA for the purpose of determining a deduction from income the expenses claimed must be verified first via third party and if unable to obtain third party via receipts.

- a. For elderly families without handicapped expenses: The amount of the deduction shall equal total medical expenses less three percent of annual income.
 - b. For elderly families with both handicapped and medical expenses: the amount of the deduction is calculated as described in paragraph 3 (b) above.
5. Elderly/Disabled Household Exemption — An exemption of \$400 per household, see Definitions in the next section.

XIII. DEFINITIONS OF TERMS USED IN THIS STATEMENT OF POLICIES

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

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

2. Accessible Facility - means all or any portion of a facility other than an individual dwelling unit used by individuals with physical handicaps. [24 CFR § 8.21]
3. Accessible Route - For persons with a mobility impairment, a continuous unobstructed path that complies with space and reach requirements of the Uniform Federal Accessibility Standards. For persons with hearing or vision impairments, the route need not comply with requirements specific to mobility. [24 CFR § 8.3 & § 40.3.5]
4. Adaptability - Ability to change certain elements in a dwelling unit to accommodate the needs of handicapped and non-handicapped persons; or ability to meet the needs of persons with different types & degrees of disability. [24 CFR § 8.3 & § 40.3.5]
5. Allocation Plan - The Plan submitted by the HA and approved by HUD under which the HA is permitted to designate a building or

portion of a building for occupancy by Elderly Families or Disabled Families. [24 CFR § 945]

6. Alteration - any change in a facility or its permanent fixtures or equipment. It does not include: normal maintenance or repairs, re-roofing, interior decoration or changes to mechanical systems. [24 CFR § 8.3 & § 8.23 (b)]
7. Applicant - a person or a family that has applied for admission to housing.
8. Area of Operation - The jurisdiction of the HA as described in State law and the HA's Articles of Incorporation.
9. Assets - Assets means "cash (including checking accounts), stocks, bonds, savings, equity in real property, or the cash value of life insurance policies. Assets do not include the value of personal property such as furniture, automobiles and household effects." IMPORTANT: See the definition of Net Family Assets, for assets used to compute annual income. (24 CFR 913.102 for definition of Net Family Assets)
10. Auxiliary Aids - means services or devices that enable persons with impaired sensory, manual, or speaking skills to have an equal opportunity to participate in and enjoy the benefits of programs or activities. [24 CFR § 8.3 }
11. Care attendant - a person that regularly visits the unit of a HA resident to provide supportive or medical services. Care attendants have their own place of residence (and if requested by HA must demonstrate separate residence) and do not live in the public housing unit. Care attendants have no rights of tenancy.
12. Co-head of household - a household where two persons are held responsible and accountable for the family.
13. Dependent - A member of the household, other than head, spouse, sole member, foster child, or Live-in Aide, who is under 18 years of age, or 18 years of age or older and disabled, handicapped, or a full-time student.[24 CFR § 913.102)
14. Designated Family - means the category of family for whom HA elects to designate a project (e.g. elderly family in a project designated for elderly families) in accordance with the 1992 Housing Act. (24 CFR § 945.105)
15. Designated housing (or designated project) - a project(s), or portion of a project(s) designated for elderly only or for disabled families only in accordance with [24 CFR § 945. 105]
16. Disabled Family - A family whose head, spouse or sole member is a

person with disabilities. (Person with disabilities is defined later in this section.) The term includes two or more persons with disabilities living together, and one or more such persons living with one or more persons including live-in aides determined to be essential to the care and well-being of the person or persons with disabilities. A disabled family may include persons with disabilities who are elderly. (24 CFR § 945.105)

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

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

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

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

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

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

Individual with handicaps means any person who has:

- a. A physical or mental impairment that:
 - substantially limits one or more major life activities;
 - has a record of such an impairment;
 - or is regarded as having such an impairment.
- b. For purposes of housing programs, the term does not include any individual who is an alcoholic or drug abuser whose current use of alcohol or drugs prevents the individual from participating in the program or activity in question, or whose participation, by reason of such current alcohol or drug abuse, would constitute a direct threat to property or the safety of others.
- c. Definitional elements:
 - i. As used in this definition the phrase, "physical or mental impairment" means any physiological disorder or

condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: Neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine; or

ii. Any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term "physical or mental impairment" includes, but is not limited to, such diseases and conditions as orthopedic, visual, speech and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, drug addiction and alcoholism.

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

iv. "Has a record of such an impairment" means: has a history of, or has been mis-classified as having, a mental or physical impairment that substantially limits one or more major life activities.

v. "Is regarded as having an impairment" means:

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

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

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

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

d. The 504 definition of handicap does not include homosexuality, bisexuality, or transvestitism. Note: These characteristics do not disqualify an otherwise disabled applicant/resident from being covered.

- e. The 504 definition of individual with handicaps is a civil rights definition. To be consider for admission to public housing a person must meet the program definition of person with disabilities found in this section.
25. Kinship care - an arrangement in which a relative or non-relative becomes the primary care giver for a child or children but is not the biological parent of the child or children. The primary care giver need not have legal custody of such child or children to be a kinship care giver under this definition. (Definition provided by the Kinship Care Project, National Association for Public Interest Law)
 26. Live-in Aide -- A person who resides with an elderly person(s) or person(s) with disabilities and who: (a) is determined by HA to be essential to the care and well being of the person(s); (b) is not obligated to support the family member; and (c) would not be living in the unit except to provide the necessary supportive services (24 CFR 913.102).

HA policy on Live-in Aides stipulates that:

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

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

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

- a. Relatives who satisfy the definitions and stipulations above may qualify as a Live-in Aide but only if they sign a statement prior to moving in relinquishing all rights to the unit as the remaining member of a resident family.
- b. A live-in aide can be a single person. A live-in aide with a family may also be considered for admission to the unit provided that the addition of the Live-in Aide's family does not result in overcrowding of the existing unit. The adult members of the live-in aide's family must meet HA's screening criteria.
- c. A Live-in Aide will be required to meet HA's screening requirements with respect to past behavior especially:
 - * *A record of disturbance of neighbors, destruction of property, or living or housekeeping habits at present or prior residences which may adversely affect the health, safety, or welfare of other tenants or neighbors;*
 - * *Criminal activity such as crimes of physical violence to persons or*

property and other criminal acts including drug-related criminal activity which would adversely affect the health, safety, or welfare of other residents or staff or cause damage to the unit or the development; and

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

27. Low-Income Household - A family whose annual income does not exceed 80 percent of the median income for the area as determined by HUD with adjustments for smaller and larger families (24 CFR § 913.102).
28. Medical Expense Allowance -- For purposes of calculating adjusted income for elderly or disabled families only, medical expenses mean the medical expense in excess of 3% of Annual Income, where these expenses are not compensated for or covered by insurance (24 CFR § 913.102).
29. Minor - A minor is a person less than 18 years of age. An unborn child will not be considered as a minor. (See definition of dependent.) Some minors are permitted to execute contracts, provided a court declares them "emancipated". (Not a HUD definition, best practice)
30. Mixed Population Project - means a public housing project for elderly and disabled families. The HA is not required to designate this type of project under 24 CFR 945 or prepare an allocation plan. [24 CFR 945.105]
31. Multifamily housing project - For purposes of Section 504, means a project containing five or more dwelling units. [24 CFR § 8.3]
32. Near-elderly family - means a family whose head, spouse, or sole member is a near-elderly person (at least 50 but less than 62 years of age). The term includes two or more near-elderly persons living together, and one or more such persons living with one or more persons who are determined to be essential to the care or well-being of the near-elderly person or persons. A near-elderly family may include other family members who are not near-elderly. [24 CFR § 945.105]
33. Near-elderly person - means a person who is at least 50 years of age but below 62, who may be a person with a disability. [24 CFR § 945.105]
34. Net Family Assets -- The net cash value, after deducting reasonable costs that would be incurred in disposing of: [24 CFR § 913.105]
 - a. Real property (land, houses, mobile homes)
 - b. Savings (CDs, IRA or KEOGH accounts, checking and savings accounts, precious metals)
 - c. Cash value of whole life insurance policies
 - d. Stocks and bonds (mutual funds, corporate bonds, savings bonds)

- e. Other forms of capital investments (business equipment)
 - f. Net cash value is determined by subtracting the reasonable costs likely to be incurred in selling or disposing of an asset from the market value of the asset. Examples of such costs are: brokerage or legal fees, settlement costs for real property, or penalties for withdrawing saving funds before maturity.
 - g. Net Family assets also include the amount in excess of any consideration received for assets disposed of by an applicant or resident for less than fair market value during the two years preceding the date of the initial application or re-examination. This does not apply to assets transferred as the result of a foreclosure or bankruptcy sale.
 - h. In the case of a disposition as part of a separation or divorce settlement, the disposition will not be considered to be less than fair market value if the applicant or resident receives important considerations not measurable in dollar terms (24 CFR § 913.102).
35. Person with disabilities³ (24 CFR § 945.105)
- means a person who —
- a. Has a disability as defined in Section 223 of the Social Security Act (42 USC. 423); or,
 - b. Is determined to have a physical or mental impairment that:
 - i. Is expected to be of long continued and indefinite duration;
 - ii. Substantially impedes his/her ability to live independently; and,
 - iii. Is of such nature that such disability could be improved by more suitable housing conditions; or,
 - c. Has a developmental disability as defined in Section 102 (5) (b) of the Developmental Disabilities Assistance and Bill of Rights Act [42 USC. 6001 (5)].
36. Portion of project - includes, one or more buildings in a multi-building project; one or more floors of a project or projects; a certain number of dwelling units in a project or projects. (24 CFR § 945.105)
37. Project, Section 504 - means the whole of one or more residential structures & appurtenant structures, equipment, roads, walks, & parking lots which are covered by a single contract for Federal financial assistance or application for assistance, or are treated as a whole for processing purposes, whether or not located on a common site. [24 CFR § 8.3]

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

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

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

The greater of 30% of the monthly Adjusted Income (as defined in these policies) or 10% of the monthly Annual Income (as defined in these policies). If the Resident pays the utilities, the amount of the Utility Allowance is deducted from the TTP. See the definition for Tenant Rent. (24 CFR §913.102).
46. Uniform Federal Accessibility Standards - Standards for the design, construction, and alteration of publicly owned residential structures to insure that physically handicapped persons will have ready access to and use of such structures. The standards are set forth in Appendix A to 24 CFR Part 40. See cross reference to UFAS in 504 regulations, [24 CFR § 8.32 (a)].
47. Utilities - Utilities means water, electricity, gas, other heating, refrigeration and cooking fuels, trash collection, and sewerage services. Telephone service is not included as a utility (7465.1 REV, APP. 3 & 24 CFR § 965.473).
48. Very Low-Income Family - Very low-income family means a family whose Annual Income does not exceed 50 percent of the median Annual Income for the area, with adjustments for smaller and larger families, as determined by the Secretary of Housing and Urban Development (24 CFR § 913.102).
49. Utility Reimbursement - Funds that are reimbursed to a resident or to the utility company on the resident's behalf if the utility allowance exceeds the Total Tenant Payment (24 CFR § 913.102).
50. Exceptions to Minimum Rent [QWRA sec. 507]
 - a) Exception - to leave out or exclude from.
 - b) Suspension - a period of time (90 days) in which payments of minimum rent will be put on hold until determination of a long-term financial hardship is determined.
 - c) Hardship - extreme financial change(s) that would cause difficulty in

meeting obligation to pay rent including changes in family composition.

d) Local Assistance - City and County government.

Exceptions to Minimum Rent [QWRA sec. 507]

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

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

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

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

55. 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. The PHA will calculate imputed welfare income in determining rent. Sanctions, reductions, and other welfare agency determinations are the responsibility of the welfare agency, and the family may appeal determinations through the Welfare Agency.

504 EQUAL ACCESS STATEMENT

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

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

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

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

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

PROCEDURAL EXHIBITS TO CMHA

ADMISSION & OCCUPANCY POLICY

Exhibit 1

Procedure on Waiting List Closure

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

How to Determine When the Waiting List May be Closed

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

Exhibit 2

Procedure on Removing Applications from the Waiting List

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

Withdrawal

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

Rejection

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

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

- a. The applicant requests withdrawal.
- b. The applicant failed to advise CMHA of his/ her continued interest in public housing. CMHA requires applicants to notify the Authority of continued interest on an annual basis. This includes changes in family status, preference status, or mailing address. Applicants must sign and return the Interest Card that is mailed by CMHA to each applicant with an active folder. Failure to complete and return the card will result in withdrawal from the Waiting List.
- c. If CMHA has made reasonable efforts to contact the applicant to determine continued interest and is unsuccessful, correspondence to the latest reported address that has been returned from the Post Office will be acceptable documentation and considered a reasonable effort to contact the applicant. This will result in rejection of the application.
- d. CMHA will notify the applicant of its intention to remove the applicant from the Waiting List.
- e. If the Authority has made reasonable efforts to contact the applicant to schedule necessary interviews necessary to complete the application process or obtain information necessary to process the application, and the applicant has failed to respond and/ or comply.
- f. If an applicant fails to keep any scheduled interview or appointment or fails to respond to the Authority concerning information that is necessary to process the application or to maintain the waiting list, the application will be withdrawn.
- g. The applicant fails to pay an outstanding balance owed to CMHA within the time specified in the Admission & Occupancy Policy and CMHA does not have a judgement against the applicant.
- h. If CMHA has a judgement against the applicant.

- i. The applicant fails to respond to an offer of housing or does not respond within the time provided.
- j. The applicant fails to meet eligibility requirements for the program.
- k. The applicant fails to pay an existing utility balance which results in a denial of new service by the utility supplier.
- l. The applicant has conducted falsification of an application, verification or any other information required by CMHA.
- m. Bad police report or landlord reference.
- n. Other reasons determined by the HA.

Exhibit 3

Application Intake and Processing - City Wide Wait List

The following brief description is provided to give Applicants and staff an outline of the

steps required to process an application for admission to CMHA's public housing program. The actual waiting period for housing may vary according to each applicant's preferences (HUD 504) and the bedroom size the household requires.

Step 1 - Initial Application: All applicant will complete a preliminary application and be place on the city wide wait list. There is a working preference that has been established to promote income mixing and deconcentration.

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

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

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

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

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

Step 3 - Offer of Housing:

a) When an applicant's name comes to the top of the waiting list, the applicant will be notified by letter. The applicant will have three (3) days from the date of the letter to contact CMHA regarding the unit offer.

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

** One refusal of housing will cause the applicant's name to be dropped from the waiting list.

Step 4 - CMHA Unit Occupied

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

Application Intake & Processing - Site Based Wait List

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

Step 1 - Initial Application: All applicants will complete a preliminary application and be placed on the site based wait list. There is a working preference that has been established to promote income mixing and deconcentration in the site.

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

a) A full interview will be conducted.

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

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

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

Step 3 - Offer of Housing:

a) When an applicant's name comes to the top of the waiting list, the applicant will be notified by letter. The applicant will have three (3) days from the date of the letter to contact CMHA regarding the unit offer.

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

** Failure to pay the security deposit within five (5) days will result in the applicant forfeiture of any applicable preference.

***Inability to pay the security deposit within the required time will result in the applicant returning to the bottom of the wait list. If, at the second offer, the applicant is still unable to pay the deposit, the applicant's name to be dropped from the waiting list.

Step 4 - CMHA Unit Occupied

Exhibit 4

Procedure on Application Intake and Processing

General

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

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

Accepting Applications

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

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

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

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

Application Interview

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

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

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

Eligibility Verification

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

Applicant Screening

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

Applicant Release of Information

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

Eligibility and Preference Review

Once all information has been received by CMHA, a review of the applicant's file will take place to determine eligibility and qualification for a Local Preference. The applicant has 30 days to complete the application process. When the file review is complete, the applicant will be notified of the application status.

Eligible applicants will be placed on the Waiting List.

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

Verification of Local Preferences

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

1. Applicants who do NOT qualify for a Preference will have thirty days to request an informal hearing to present further evidence of the claimed preference. They will also be advised of their right to due process in a court of law if they feel the decision to deny a Preference was based upon illegal discrimination. Informal Hearings will be conducted by the Authority employee who denied the Local Preference or two CMHA employees designated by the Authority.
2. At the Informal Hearing, CMHA is under no obligation to justify or defend its definitions of the Preference Categories or the verification requirements relating to preferences. The Authority will justify the decision to award or deny the Preference only.

Re-verification of Local Preferences

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

Waiting List Placement

Once the above steps are completed, the application will be placed on the Waiting List based on ranking (date and time of application) and Local Preferences.

1. Preferences, ranking, etc may deviate by the Central Waiting List and Site Based Waiting Lists. Each Wait List is broken into sub-lists determining type of building needed (Elderly or Non-elderly) and size of unit (bedroom size).
2. Working families will be given preference in an otherwise non-preference

Waiting List pool.

Waiting List Update

At least once annually, CMHA will send Waiting List applicants a Continued Interest Letter with a required return response.

1. If the client fails to express a continued interest in housing, their application will be withdrawn.
2. Applicants have 30 days to return the Continued Interest Letter. This process is done for all housing programs administered by CMHA.

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

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

Rent Calculation

When the application for admission has been approved, the Total Tenant Payment will be determined using the Federal formula: $TTP = \text{the greatest of } 30\% \text{ of adjusted income or Flat Rent (if selected)}$.

If CMHA has tenant paid utilities, the tenant rent will be the TTP or FlatRent, reduced by the Allowance for Utilities applicable to the unit the applicant is renting (Low Rent program ONLY). Any utility reimbursements will be paid directly to the tenant by check. An offer to select Flat Rent will be offered at the appropriate site once an offer of housing has been made.

Showing the Unit

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

Applicant Acceptance or Rejection of Unit

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

1. If the applicant rejects an offer for housing, CMHA will determine if the reason

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

2. If the unit is rejected and the reason is not determined acceptable under the Tenant Selection & Assignment Plan, the application is removed from the Waiting List.

Leasing of Units

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

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

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

Exhibit 5

Verification Procedure

What must be verified

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

Eligibility for admission and continued occupancy:

Income, assets, asset income

Completion of qualified training program(s)
Family composition
Social Security Numbers
Birth Certificates

Local Preferences, if any:

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

Allowances:

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

Compliance with Applicant Selection Criteria:

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

Special Program Requirements:

Special Needs Housing

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

Period of Verification

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

Forms of Verification

Documentation of the verification process may include:

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

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

received.

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

Attempted Fraud

Any information provided by the applicant or tenant that proved to be untrue may be used to disqualify the applicant for admission or continued occupancy on the basis of attempted fraud. CMHA considers false information about the income, assets, family composition, social security numbers, Local Preference(s), allowances, previous tenant history or criminal grounds for rejecting an applicant or for eviction of a tenant. Unwitting errors that do not secure an advantage with regard to program eligibility, preferences, or rent will not be used as a basis for application rejection.

Sources of Information

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

Verifications and Rent Computations

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

Preferred forms of Verification

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

Third party written

Third party oral with a record kept in the file

Review of the documents provided by the household / family

Affidavits from the family

Each file must be documented to show that CMHA staff diligently attempted to obtain third party written verifications before relying on a lessor acceptable form of verification. If the Third party written documentation is not available, the reason will be documented in the client file.

Verification of Annual Income

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

1. Irregular workers will be estimated on the basis of the most accurate information available, with consideration of earning ability and work history.
2. Overtime income is computed in accordance with verification obtained from the employer unless other verification obtained can be considered more reliable or accurate.

Exhibit 6

Applicant Screening Procedures

General Principles of Screening

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

A distinction is made between verifications provided by landlords and information from other housing providers. Landlords have a relationship with applicants that is similar to that of

which CMHA has with its residents compared to other housing providers such as friends, relatives, shelters, or institutions. Landlords are more likely to use leases that are comparable to Public Housing Leases compared to other housing providers. CMHA staff is prepared to explain to landlords and other housing providers the information used to determine whether or not the applicant is able to comply with lease requirements.

Applicant History Referral/ Inquiries

Suitability requires that the applicant and the members of the applicant's household, meet any needs based requirements as established by CMHA and demonstrate through verifications that they: will pay the rent in full and timely, care for the unit, and will be good neighbors.

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

RENTAL/ OWNERSHIP GUIDELINES

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

10. If the applicant initiates threats, acts in an abusive manner, or behaves in some other manner which indicates an intent to assault employees, other applicants, or residents of CMHA the application will be withdrawn.

POLICE REPORT GUIDELINES

1. Criminal activity of the part of any applicant family member involving crimes of physical violence to persons or property and other criminal acts including drug-related criminal activity with would adversely affect the health, safety, or welfare of other residents will be a valid reason for withdrawal of an application. CMHA reviews evidence that substantiates a history of criminal behavior through an arrest, conviction, and/ or probation period for crimes on the part of any applicant family member.
2. Any charges that may relate to the welfare of other residents including the applicant's family or charges that could affect the safety and quiet enjoyment of neighbors must have dispositions provided.
3. Applications will not be withdrawn for minor traffic violations, such as stop signs, jaywalking, etc...
4. Applications will be automatically withdrawn for any of the following convictions in the past five years:
 - Murder
 - Domestic Violence
 - Child Endangering
 - Child Molestation
 - Assault
 - Arson
 - Drug Related
 - Petty Theft
 - Recurring OMVI
 - Recurring Prostitution
 - Resisting Arrest
 - Aggravated Threats / Menacing
5. For the following only, substantial involvement in a rehabilitation program for a minimum of six months in addition to successful completion of a rehabilitation program will be required to reconsider an application from withdrawal. CMHA will not house an applicant until the six month period has passed.
 - Petty Theft
 - OMVI
 - Prostitution
6. For the following only, substantial involvement in a rehabilitation program for an eighteen month period preceding application will be needed to reconsider and

application from withdrawal.

Assault
Domestic Violence
Child Endangerment
Aggravated Burglary

7. Persons with convictions cannot be housed without substantiated evidence of active participation in an accredited and/ or recognized program relating to the particular offense within the first six months after conviction or release from incarceration.

FORMS OF VERIFICATION

1. Third Party Verification - an agency or Authority (ie. Police Department) may be utilized to provide CMHA with information required. Other verifications (ie. landlords, parole officers, etc...) May be required.
2. Reports of Interviews
3. Letters
4. Notes of telephone conversations with reliable sources The following are the methods by which every applicant's performance relative to housing will be obtained:

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

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

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

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

FALSIFICATION

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

Exhibit 7

Procedure on Reexamination

Annual Reexamination Effective Date

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

Initial Reexamination Notice

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

Failure to show for the Scheduled Interview

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

Exhibit 8

Interim Reviews

Description: Residents must report all changes in family composition or status to the housing manager within 10 calendar days of the occurrence. Increases in gross income at or above \$1000 annually must be reported within 10 days of occurrence. Not all changes in family income between reexamination will result in a rent change.

An interim adjustment will not be processed if a decrease in income will not last more than 30 days or if Public Assistance was terminated due to fraud or non-compliance with Program Rules.

Step One - *Residents must present documentation to the housing manager indicating that the change reported will last more than 30 days.*

Step Two - *Once the documentation has been provided the housing manager will review the Interim Review Procedures with the client and then schedule an appointment for an Interim Review.*

Step Three - *At the appointment, the resident must present documentation of the change. The documentation presented will be verified with a 3rd party request to the source to verify the validity. **Failure to present documentation at the appointment will result in a cancellation of the Interim Review.***

Examples of Acceptable Documentation May Include:

- a). A letter of termination from Employment including the date in which termination occurred and documentation of application for benefits for Public Assistance and Unemployment Compensation.
- b). Birth certificates/ record and social security cards (or an application for a ss card) for the family addition to the household due to natural births.
- c). A letter of termination of Public Assistance including the reason for termination from the program and the date in which termination occurred.
- d). A letter from Workman's Compensation including the date in which benefits commence and the anticipated return to work date.
- e). A letter from Unemployment Bureau including the date in which benefits commence and a letter from Employment including the date in which resident may return to work.
- f). Residents reporting -0- income must present documentation that they have applied for Public Assistance, Unemployment, status of Child Support (if applicable) and clearly document how they are making their living expenses. Subject to periodic verification.

Step Four - *The resident will have 30 days to complete the interim review process. Failure to do so will result in a cancellation of the Interim Review.*

Step Five - *Notification/Completion of the Interim; Changes will go in effect the month following the date of the scheduled appointment and presentation of documentation by the client. Until such notice is provided, the resident must continue to pay rent in accordance with the Lease Agreement.*

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

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

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

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

Failure to Report Accurate Information

In instances where verified information show that families paid a lower rent than they should have, due to fraud, misrepresentation or concealment of relevant information, rent will be re-computed and will be retroactively charged for such periods.

1. The family is required to pay the difference between what they paid and what they should have paid. This also includes reviews that are not completed on a timely basis.
2. CMHA reserves the right to pursue evictions or other legal action in such instances, on a case by case basis.

Exhibit 9

Minimum Rent Hardship Procedures

Minimum Rent Hardships must be verifiable as being of a long-term basis. Proper verification of resident claims are required.

The family has lost eligibility for or is pending eligibility for a Federal, State, or Locally funded Training and/ or Assistance Program; the following must be documented by the client in order to initiate the Special Review:

1. Documentation of the reason Training and/ or Assistance was terminated
2. Documentation of the type of funding (Federal, State, or Local Government) for the Training and/ or Assistance Program
3. Documentation of the application date and time frame allotted to process the application for Training and/ or Assistance Program

If the eligibility was terminated or application for Training and/ or Assistance was denied:

1. the initial determination made by the third party will be considered
2. non-compliance determinations will not be considered
3. determinations indicating that the individual is capable of working will not be considered

The family may be evicted as a result of the imposition of the \$50 minimum rent requirement; the following must be documented by the client in order to initiate the Special Review:

1. Documentation of monthly living expenses
2. Copies of current utility bills including phone and cable service
3. Documentation of how rent was paid for the past 6 months
4. Documentation of application for employment, training, and/ or assistance

The income of the PHA resident family has decreased due to a change in circumstance as it relates to family composition or loss of income; the following must be documented by the client in order to initiate the Special Review:

1. Documentation of the reason for termination or loss of income
2. Documentation of application for employment, training, and/ or assistance
3. Documentation of the change in family composition

A death in the PHA family has occurred; the following must be documented by the client in order to initiate the Special Review:

1. Documentation of the death that occurred
2. Documentation of the loss of income and/ or expenses incurred as a result thereof
3. Documentation of application for employment, training, and/ or assistance

Once the above procedures have been followed, the Hardship Review will be forwarded to the designee for review and determination. Failure to submit all information will result in a denial of the request.

Exhibit 10

Notification of Resident Grievance

DATE: _____

NOTICE TO ALL RESIDENTS AND ALL APPLICANTS:

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

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

METROPOLITAN HOUSING AUTHORITY.

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

THANK YOU.

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

Exhibit 11

Informal Settlement Conference Schedule

DATE OF NOTICE: _____
(Must be mailed to Tenant(s) on same date)

TO: _____

(List all Adult members of Household)
_____ Apt. # _____
Columbus, Ohio 432 _____

RE: Informal Settlement Conference

Dear Tenant(s):

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

The Conference will be held at _____

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

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

Sincerely yours,

By: _____
Housing Community Manager

MEMORANDUM OF SERVICE

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

BY: _____

Exhibit 12

Summary of Informal Settlement Conference

DATE: _____

TO: _____

(List all adult members of household)

_____ Apt. # _____
Columbus, Ohio 432_____

On the _____ day of _____, 20____, an Informal Settlement Conference ("Conference") was held to discuss your grievance which was received by the Columbus Metropolitan Housing Authority (CMHA) on the _____ day of _____ 19____. A summary of the Conference is set forth as follows:

- I. The names of each participant (include each tenant, each CMHA representative, and all others) of the Conference are as follows:

Your grievance is that:

III. The disposition on your grievance is:

IV The specific reason for the disposition on your grievance are:

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

1. You must complete the Grievance Hearing Request Form (attached hereto as "Exhibit 13") or a written request for a hearing. You must state your reasons for your dissatisfaction and/ or grievance and the action or relief sought; AND
2. Deliver or mail a copy of the Summary and the completed Grievance Hearing Request Form or written request for a hearing to:
 - a. Your Housing Community Management Office; OR
 - b. The Columbus Metropolitan Housing Authority, Attention: Director of Housing Management and Services. 960 E. Fifth Avenue, Columbus, Ohio 43201.

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

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

NOTE: A condition precedent to the utilization of the Grievance Procedure is the payment of all rent arrearage claimed by CMHA where the grievance conditions

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

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

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

Sincerely yours,

By: _____
Housing Community Manager

MEMORANDUM OF SERVICE

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

BY: _____

Exhibit 13

Resident Grievance Hearing Request Form

The undersigned Tenant(s) hereby notify(s) CMHA that he/ she/ they is (are) dissatisfied with the CMHA Summary of the Informal Settlement Conference which was held on the ____ day of _____, 20____

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

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

Tenant

Tenant

Tenant

Tenant

Exhibit 14

Annual Selection of Rent Payment

Flat rent has been established to promote income diversity in our communities. Residents that may benefit are those whose incomes have increased to the point that an adjusted income based rent is unreasonable for the housing provided.

Fair Market Rent for Franklin County based on bedroom size have been utilized in determining flat rent amounts. Annually residents are offered a choice to select 30% adjusted gross income or flat rent in determining rent. Residents wishing to select a flat rent may do so by submitting this form to the Property Manager in which you reside.

The Flat Rent amount according to your bedroom size is \$_____ for your community. If you would like to choose flat rent, please submit the following request to the Property Manager within 10 days of the date of this letter. If you do not complete the request and submit it within the required time, CMHA will assume that you have elected the calculation of 30% adjusted income in determining rent.

I, _____ have received notification and a further explanation of CMHA Policy on Flat Rent and I would like to choose flat rent.

Resident Signature

Date

Resident Name

S S Number

ANNUAL STATEMENT/
PERFORMANCE AND EVALUATION REPORT
PART I: SUMMARY

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

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

COMPREHENSIVE GRANT PROGRAM (CGP) 2001 -- 710

NAME OF PHA:
COLUMBUS METROPOLITAN HOUSING AUTHORITY, COLUMBUS, OHIO

Comprehensive Grant Number: 710
FFY of Grant Approval: 2001

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

LINE NO.	SUMMARY BY DEVELOPMENT ACCOUNT	Total Estimated Cost		Actual Cost (2)	
		Original	Revised (1)	Obligated	Expended
1	TOTAL NON-CGP FUNDS		0		
2	1406 OPERATIONS (May not exceed 10% of line 19)		800,000		
3	1408 MANAGEMENT IMPROVEMENTS *		840,000		
4	1410 ADMINISTRATION *		380,000		
5	1411 AUDIT *		5,000		
6	1415 LIQUIDATED DAMAGES *		0		
7	1430 FEES AND COSTS / CONSTRUCTION MANAGEMENT SEF *		500,000		
8	1440 SITE ACQUISITION *		0		
9	1450 SITE IMPROVEMENTS *		1,091,599		
10	1460 DWELLING STRUCTURES *		4,383,401		
11	1465.1 DWELLING EQUIPMENT-NONEXPENDABLE *		0		
12	1470 NONDWELLING STRUCTURES *		0		
13	1475 NONDWELLING EQUIPMENT *		0		
14	1485 DEMOLITION *		0		
15	1490 REPLACEMENT RESERVE *		0		
16	1495.1 RELOCATION COSTS *		0		
17	1498 MOD USED FOR DEVELOPMENT *		0		
18	1502 CONTEGENCY (MAY NOT EXCEED 8% OF LINE 19) *		\$0		
19	AMOUNT OF ANNUAL GRANT (SUM OF LINES 2-18) *		8,000,000		
20	AMOUNT OF LINE 19 RELATED TO LBP ACTIVITIES *		120,000		
21	AMOUNT OF LINE 19 RELATED TO SECTION 504 COMPLIANCE *		320,000		
22	AMOUNT OF LINE 19 RELATED TO SECURITY *		1,100,000		

23 AMOUNT OF LINE 19 RELATED TO ENER. CONSERV. MEASURE *

300,000

Signature of Executive Director and Date:

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

Dennis S. Guest

Date:

tion Report.

\$8,000,000.00 TOTAL

\$8,137,459.00 APPROVED BUDGET

\$137,459.00

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

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

(CGP) 710 -- 2001

Development Number/Name HA-Wide Activities		All Funds Obligated (Quarter Ending Date)			All Funds Expended (Quarter Ending Date)		
		Original	Revised 1	Actual 2	Original	Revised 1	Actual 2
Poindexter Village	OH16 - 001	9/30/2003			9 / 30 / 2005		
Lincoln Park	OH16 - 002 / 9	9/30/2003			9 / 30 / 2005		
Riverside Homes	OH16 - 003	9/30/2003			9 / 30 / 2005		
Sunshine Terrace	OH16 - 006	9/30/2003			9 / 30 / 2005		
Sawyer Towers	OH16 - 010	9/30/2003			9 / 30 / 2005		
Jenkins Terrace	OH16 - 012	9/30/2003			9 / 30 / 2005		
Worley Terrace	OH16 - 014	9/30/2003			9 / 30 / 2005		
Sunshine Annex	OH16 - 015	9/30/2003			9 / 30 / 2005		
Marion Square	OH16 - 020	9/30/2003			9 / 30 / 2005		
Kenmore Square	OH16 - 033	9/30/2003			9 / 30 / 2005		
Post Oak Station	OH16 - 033 / 46	9/30/2003			9 / 30 / 2005		
Glenview Estate	OH16 - 0037	9/30/2003			9 / 30 / 2005		
Maplewood Heights	OH16 - 038	9/30/2003			9 / 30 / 2005		
Bollenger Towers	OH16 - 039	9/30/2003			9 / 30 / 2005		
Eastmoor Square	OH16 - 040	9/30/2003			9 / 30 / 2005		
Reeb Hosack	OH16 - 041	9/30/2003			9 / 30 / 2005		
Canonby Couert	OH16 - 042	9/30/2003			9 / 30 / 2005		
Thornwood Commons	OH16 - 043	9/30/2003			9 / 30 / 2005		
Trivett Heights	OH16 - 044	9/30/2003			9 / 30 / 2005		
CMHA New Office Building		9/30/2003			9 / 30 / 2005		
CMHA New Maintenance Bldg.		9/30/2003			9 / 30 / 2005		
New Construction Projects		9/30/2003			9 / 30 / 2005		

Signature of Excecutive Director & Date:

Signature of Public Housing Director/Office

Dennis S. Guest

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

Page 1 of 1

MEN1

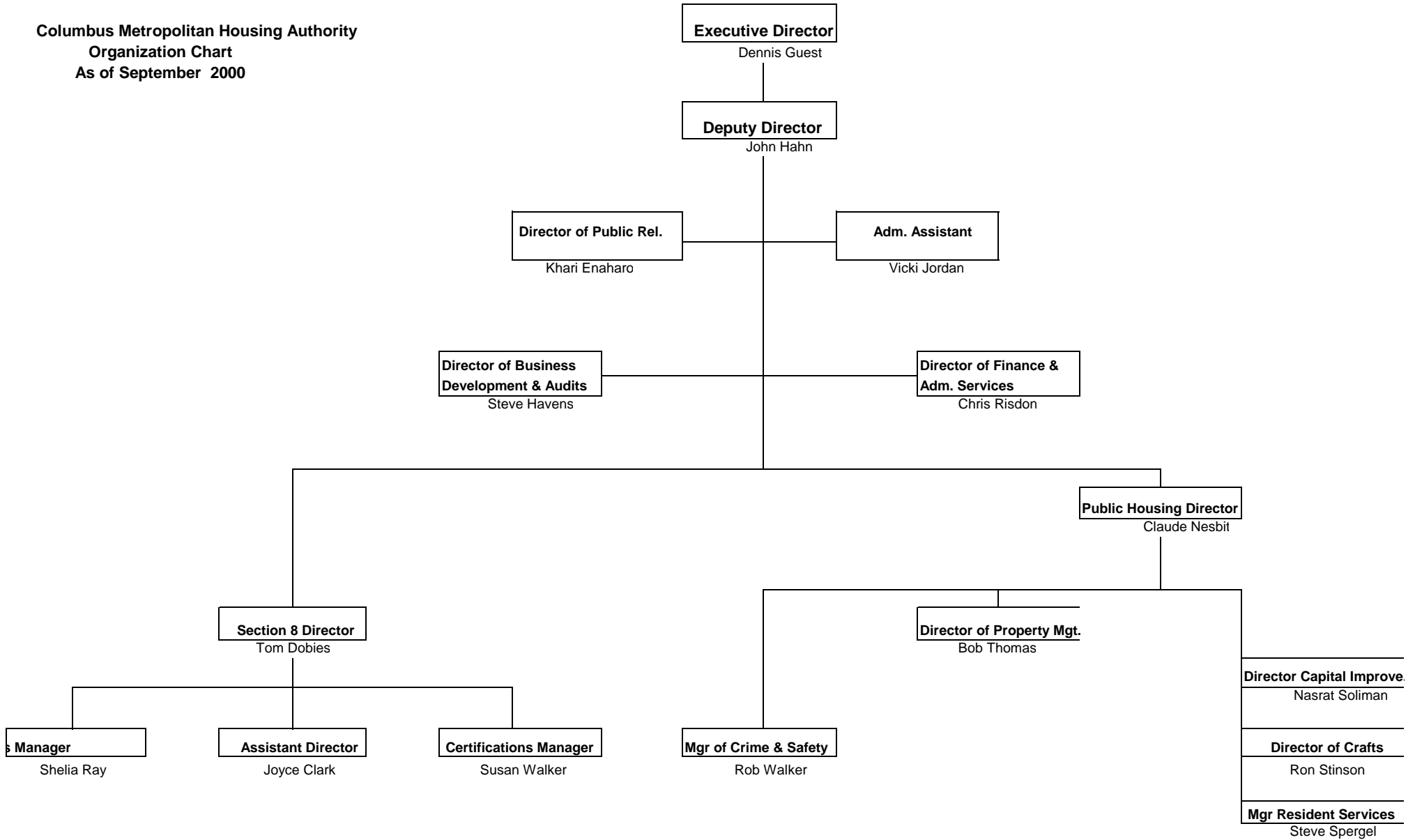
OMB No. 2577-0157 (Exp. 07/31/98)

Reasons for Revised Target Dates 2

FORM HUD-52837

NAS

**Columbus Metropolitan Housing Authority
 Organization Chart
 As of September 2000**



Number of employees 256

**FIVE-YEAR ACTION PLAN
PART I: SUMMARY
COMPREHENSIVE GRANT PROGRAM (CGP) 710 - 200**

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

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

NAME OF PHA/IHA: COLUMBUS METROPOLITAN HOUSING AUTHORITY		Locality (City / County / State) Columbus, Franklin, Ohio		-----X----- Original ----- Revision N -----	
A	Development Number/Name/	Work Statement Year 3: FFY2001	Work Statement Year 4: FFY2002	Work Statement Year 5: FFY2003	Work Statement Year 5: FFY 2004
1	OH16-001 Poindexter Village	\$388,737	\$0	\$0	\$0
2	OH16-002 Lincoln Park	\$291,083	\$0	\$0	\$0
3	OH16-003 Riverside Homes	\$120,189	77337.00	\$77,337	\$0
4	OH16-004 Sullivant Garden	\$0	\$0	\$0	\$0
5	OH16-006 Sunshine Terrace	\$0	\$0	\$0	\$0
6	OH16-009 Sullivant Garden	\$0	\$0	\$0	\$0
7	OH16-010 Sawyer Towers	\$368,079	\$0	\$0	\$0
8	OH16-012 Jenkins Terrace	\$382,162	\$1,000,000	\$1,000,000	\$1,000,000
9	OH16-013 Taylor Terrace	\$0	\$0	\$0	\$0
10	OH16-014 Worley Terrace	\$212,209	\$0	\$1,000,000	\$2,000,000
11	OH16-015 Sunshine Annex	\$321,128	\$1,000,000	\$0	\$0
12	OH16-020 Marion Square	\$244,134	\$0	\$0	\$0
13	OH16-033 Kenmore Square	\$52,583	\$33,835	\$33,835	\$0
14	OH16-035 Post Oak Station I	\$69,484	\$44,710	\$44,710	\$0
15	OH16-037 Glenview Estate	\$46,949	\$30,210	\$320,210	\$0
16	OH16-038 Maplewood Heights	\$66,667	\$0	\$0	\$0
17	OH16-039 Bollinger Tower	\$293,897	\$0	\$0	\$0
18	OH16-040 Eastmoor Square	\$49,766	\$32,022	\$32,022	\$0
19	OH16-041 Reeb-Hosack	\$25,352	\$16,313	\$16,313	\$0
20	OH16-042 Canonby Court	\$46,949	\$30,210	\$30,210	\$0
21	OH16-043 Thornwood Commons	\$80,752	\$51,961	\$51,961	\$0
22	OH16-044 Trivett Height	\$128,640	\$82,775	\$82,775	\$0
23	OH16-046 Post Oak Station II	\$73,240	\$47,127	\$47,127	\$0
24	OH16-200 CMHA New Office Builk	\$0	\$0	\$0	\$0
25	OH16-201 CMHA New Maintenance Building	\$1,813,000	\$0	\$0	\$0
26	OH16-202 New Construction	\$400,000	\$2,446,500	\$2,446,500	\$1,893,000
<hr/>					
B	Physical Improvements Subtotal:	\$5,475,000	\$4,893,000	\$4,893,000	\$4,893,000
C	Management Improvements:	\$840,000	\$819,000	\$819,000	\$819,000
D	PHA-wide Non dwelling Structures & Equipment:	\$0	\$0	\$0	\$0
E	Administration:	\$380,000	\$512,000	\$512,000	\$512,000
F	Other: (A/E, C.M. , Relocation, Auditing)	\$500,000	\$500,000	\$500,000	\$500,000

G	Operations	\$800,000	\$276,000	\$276,000	\$276,000
H	Demolition:	\$0	\$0	\$0	\$0
I	Replacement Reserve:	\$0	\$0	\$0	\$0
J	Mod Used for Development:	\$0	\$0	\$0	\$0
K	Total CGP Funds:	\$8,000,000	\$7,000,000	\$7,000,000	\$7,000,000
L	Total Non- CGP Funds:				
M	GRAND TOTAL	8,000,000	7,000,000	7,000,000	7,000,000

Signature of Executive Director:

Dennis S. Guest

Signature of Public Housing Director & Dat

Work Statement Year 5: FFY 2005	
\$200,000	
\$0	
\$200,000	
\$0	
\$200,000	
\$0	
\$200,000	
\$100,000	
\$0	
\$0	
\$1,500,000	
\$0	
\$0	
\$500,000	
\$0	
\$400,000	
\$0	
\$0	
\$0	
\$0	
\$300,000	
\$0	
\$300,000	
\$0	
\$0	
\$100,000	
\$4,900,000	
\$841,668	
\$0	
\$511,000	
\$500,000	

N

\$270,000
\$0
\$0
\$0
\$7,022,668
7,022,668

NAS

YR. 2000 : Security & Lighting cost distribution

# UNITS	BUDG. / PROJ.T.	BUDGET	T. #	UNITS	A/E FEE	Const Cost
414.00	\$160,635	\$1,100,000		2835.00	\$8,032	\$152,603
310.00	\$120,282	\$1,100,000		2835.00	\$6,014	\$114,268
128.00	\$49,665	\$1,100,000		2835.00	\$2,483	\$47,182
0.00	\$0	\$1,100,000		2835.00	\$0	\$0
0.00	\$0	\$1,100,000		2835.00	\$0	\$0
0.00	\$0	\$1,100,000		2835.00	\$0	\$0
392.00	\$152,099	\$1,100,000		2835.00	\$7,605	\$144,494
194.00	\$75,273	\$1,100,000		2835.00	\$3,764	\$71,510
0.00	\$0	\$1,100,000		2835.00	\$0	\$0
226.00	\$87,690	\$1,100,000		2835.00	\$4,384	\$83,305
129.00	\$50,053	\$1,100,000		2835.00	\$2,503	\$47,550
260.00	\$100,882	\$1,100,000		2835.00	\$5,044	\$95,838
56.00	\$21,728	\$1,100,000		2835.00	\$1,086	\$20,642
74.00	\$28,713	\$1,100,000		2835.00	\$1,436	\$27,277
50.00	\$19,400	\$1,100,000		2835.00	\$970	\$18,430
71.00	\$27,549	\$1,100,000		2835.00	\$1,377	\$26,171
100.00	\$38,801	\$1,100,000		2835.00	\$1,940	\$36,861
53.00	\$20,564	\$1,100,000		2835.00	\$1,028	\$19,536
27.00	\$10,476	\$1,100,000		2835.00	\$524	\$9,952
50.00	\$19,400	\$1,100,000		2835.00	\$970	\$18,430
86.00	\$33,369	\$1,100,000		2835.00	\$1,668	\$31,700
137.00	\$53,157	\$1,100,000		2835.00	\$2,658	\$50,499
78.00	\$30,265	\$1,100,000		2835.00	\$1,513	\$28,751
2835.00	\$1,100,000				\$55,000	\$1,045,000
						\$1,100,000

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

BUDG. / PROJ. T.	BUDGET	T. #	UNITS	A/E FEE	Const Cost
\$388,737	\$2,662,000		2835.00	\$19,437	\$369,300
\$291,083	\$2,662,000		2835.00	\$14,554	\$276,529
\$120,189	\$2,662,000		2835.00	\$6,009	\$114,180
\$0	\$2,662,000		2835.00	\$0	\$0
\$0	\$2,662,000		2835.00	\$0	\$0
\$0	\$2,662,000		2835.00	\$0	\$0
\$368,079	\$2,662,000		2835.00	\$18,404	\$349,675
\$182,162	\$2,662,000		2835.00	\$9,108	\$173,053
\$0	\$2,662,000		2835.00	\$0	\$0
\$212,209	\$2,662,000		2835.00	\$10,610	\$201,598
\$121,128	\$2,662,000		2835.00	\$6,056	\$115,072
\$244,134	\$2,662,000		2835.00	\$12,207	\$231,927
\$52,583	\$2,662,000		2835.00	\$2,629	\$49,954
\$69,484	\$2,662,000		2835.00	\$3,474	\$66,010
\$46,949	\$2,662,000		2835.00	\$2,347	\$44,601
\$66,667	\$2,662,000		2835.00	\$3,333	\$63,334
\$93,898	\$2,662,000		2835.00	\$4,695	\$89,203
\$49,766	\$2,662,000		2835.00	\$2,488	\$47,277
\$25,352	\$2,662,000		2835.00	\$1,268	\$24,085
\$46,949	\$2,662,000		2835.00	\$2,347	\$44,601
\$80,752	\$2,662,000		2835.00	\$4,038	\$76,714
\$128,640	\$2,662,000		2835.00	\$6,432	\$122,208
\$73,240	\$2,662,000		2835.00	\$3,662	\$69,578
\$2,662,000				\$133,100	\$2,528,900
					\$2,662,000

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

N

# UNITS	BUDG. / PROJ.	T. BUDGET	T. # UNITS	A/E FEE	Const Cost
0.00	\$0	\$446,500	739.00	\$0	\$0
0.00	\$0	\$446,500	739.00	\$0	\$0
128.00	\$77,337	\$446,500	739.00	\$3,867	\$73,470
0.00	\$0	\$446,500	739.00	\$0	\$0
0.00	\$0	\$446,500	739.00	\$0	\$0
0.00	\$0	\$446,500	739.00	\$0	\$0
0.00	\$0	\$446,500	739.00	\$0	\$0
0.00	\$0	\$446,500	739.00	\$0	\$0
0.00	\$0	\$446,500	739.00	\$0	\$0
0.00	\$0	\$446,500	739.00	\$0	\$0
0.00	\$0	\$446,500	739.00	\$0	\$0
0.00	\$0	\$446,500	739.00	\$0	\$0
56.00	\$33,835	\$446,500	739.00	\$1,692	\$32,143
74.00	\$44,710	\$446,500	739.00	\$2,236	\$42,475
50.00	\$30,210	\$446,500	739.00	\$1,510	\$28,699
0.00	\$0	\$446,500	739.00	\$0	\$0
0.00	\$0	\$446,500	739.00	\$0	\$0
53.00	\$32,022	\$446,500	739.00	\$1,601	\$30,421
27.00	\$16,313	\$446,500	739.00	\$816	\$15,498
50.00	\$30,210	\$446,500	739.00	\$1,510	\$28,699
86.00	\$51,961	\$446,500	739.00	\$2,598	\$49,363
137.00	\$82,775	\$446,500	739.00	\$4,139	\$78,636
78.00	\$47,127	\$446,500	739.00	\$2,356	\$44,771
739.00	\$446,500			\$22,325	\$424,175
					\$446,500

COMPREHENSIVE GRANT PROG

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

Development Name Major Work Category	year 1 : 2001		year 2 : 2002		year 3 : 2003		year 4 : 2004		year 5 : 2005	
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost
OH16-001 POINDEXTER VILLAGE										
*Administration costs		\$61,885		\$64,664		\$64,664		\$64,664		\$60,000
*Others: A/E fees & costs		\$19,437		\$0		\$0		\$0		\$20,000
*Site Improvement										
Repl./Upgr. Site Ut		\$25,000								
Landscaping		\$50,000								
Site Lighting										
Parking / Side Wal		\$70,000								
*Dwelling Structure										
Upgrade HVAC system		\$20,000								
Upgrade electrical syst.		\$50,000								
Upgrade plumbing syst.		\$34,000								
Upgrade		\$50,000								
Upgrade build. exterior		\$50,000								\$120,000
Handicap compliance		\$20,000								
Upgrade Security System										
*Dwelling Equipment										
TOTAL PROJECT		\$450,322		\$64,664		\$64,664		\$64,664		\$200,000
OH16-002 LINCOLN PARK										
*Administration costs		\$46,638		\$48,732		\$48,732		\$48,732		
*Others: A/E		\$14,554		\$0		\$0		\$0		
*Site Impr										
Repl./Upgr. Site Ut		\$50,000								
Landscaping		\$20,000								
Site Lighting										
Parking / Side Wal		\$20,000								
*Dwelling Structure										
Upgrade										
Upgrade		\$20,000								
Upgrade plumbing syst.		\$20,000								
Upgrade build. interior		\$100,000								
Upgrade build. exterior		\$36,529								
Handicap compliance		\$10,000								
Upgrade Security System										
*Dwelling Equipment										
TOTAL PROJECT		\$337,721		\$48,732		\$48,732		\$48,732		\$0
Subtotal of estim	#####	#####	#####	#####	#####	#####	#####	#####	#####	#####

N

COMPREHENSIVE GRANT PROGRAM

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

N

Development Name Major Work Category	year 1 : 2001		year 2 : 2002		year 3 : 2003		year 4 : 2004		year 5 : 2005	
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost
OH16-003 RIVERSIDE HOMES										
*Administration costs		\$19,134		\$19,993		\$19,993		\$19,993		\$20,000
*Others: A/E		\$6,009		\$3,867		\$3,867		\$0		\$15,000
*Site Impr										
Repl./Upgr. Site Ut		\$20,000								
Landscaping		\$10,000								
Site Lighting										
Parking / Side Wal		\$10,000		\$23,470		\$23,470				
*Dwelling Structure										
Upgrade HVAC system										
Upgrade electrical syst.										
Upgrade plumbing syst.		\$20,000								
Upgrade				\$50,000		\$50,000		\$0		
Upgrade build. exterior		\$44,180								\$180,000
Handicap compliance		\$10,000								
Upgrade Security System										
*Dwelling Equipment										
PROJECT		\$139,323		\$97,330		\$97,330		\$19,993		\$215,000
OH16-006 SUNSHINE TERRACE										
*Administration costs		\$26,907		\$28,115		\$28,115		\$28,115		\$28,115
*Others: A/E		\$0		\$0		\$0		\$0		\$15,000
*Site Impr										
Repl./Upgr. Site Utilities										
Landscaping										
Site Lighting										
Parking / Side Walks / Play Grounds										
*Dwelling Structure										
Upgrade										
Upgrade										
Upgrade plumbing syst.										
Upgrade build. interior										
Upgrade build. exterior										\$175,000
Handicap compliance										
Upgrade Security System										
*Dwelling Equipment										
TOTAL PROJECT		\$26,907		\$28,115		\$28,115		\$28,115		\$218,115
Subtotal of estim	#####		#####		#####		\$48,108		#####	

COMPREHENSIVE GRANT PROG

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

N

Development Name Major Work Category	year 1 : 2001		year 2 : 2002		year 3 : 2003		year 4 : 2004		year 5 : 2005	
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost
OH16-010 SAWYER TOWERS										
*Administration costs		\$58,597		\$61,228		\$61,228		\$61,228		\$60,000
*Others: A/E		\$18,404		\$0		\$0		\$0		\$10,000
*Site Impr										
Repl./Upgr. Site Ut		\$20,000								
Landscaping		\$10,000								
Site Lighting										
Parking / Side Wal		\$20,000								
*Dwelling Structure										
Upgrade HVAC system		\$70,000								
Upgrade electrical syst.		\$20,000								
Upgrade plumbing syst.		\$50,000								
Upgrade		\$100,000								
Upgrade build. exterior		\$59,675								\$140,000
Handicap compliance										
Upgrade Security System										
*Dwelling Equipment										
PROJECT		\$426,676		61,228		\$61,228		\$61,228		\$210,000
OH16-012 JENKINS TERRACE										
*Administration costs		\$29,999		\$30,301		\$30,301		\$30,301		\$20,000
*Others: A/E		\$9,108		\$50,000		\$50,000		\$50,000		\$5,000
*Site Impr										
Repl./Upgr. Site Utilities				\$75,000		\$75,000		\$75,000		
Landscaping				\$20,000		\$20,000		\$20,000		
Site Lighting		\$20,000		\$10,000		\$10,000		\$10,000		
Parking / Side Walks / Play Grounds				\$15,000		\$15,000		\$15,000		
*Dwelling Structure		\$100,000								
Upgrade		\$70,000		\$300,000		\$300,000		\$300,000		
Upgrade		\$80,000		\$20,000		\$20,000		\$20,000		
Upgrade plumbing syst.		\$103,054		\$20,000		\$20,000		\$20,000		
Upgrade build. interior				\$490,000		\$490,000		\$490,000		
Upgrade build. exterior										
Handicap compliance										
Upgrade Security System										\$80,000
*Dwelling Equipment										
TOTAL PROJECT		\$412,161		1,030,301		\$1,030,301		\$1,030,301		\$105,000
Subtotal of estim	#####	#####	#####	#####	#####	#####	#####	#####	#####	#####

COMPREHENSIVE GRANT PROG

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

Development Name Major Work Category	year 1 : 2001		year 2 : 2002		year 3 : 2003		year 4 : 2004		year 5 : 2005	
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost
OH16-014 WORLER TERRACE										
*Administration costs		\$33,783		\$35,300		\$35,300		\$70,000		
*Others: A/E		\$10,610				\$50,000		\$100,000		
*Site Impr										
Repl./Upgr. Site Ut		\$21,599				\$20,000		\$30,000		
Landscaping		\$10,000				\$20,000		\$10,000		
Site Lighting						\$20,000		\$0		
Parking / Side Walks / Play Grounds						\$10,000		\$10,000		
*Dwelling Structure										
Upgrade HVAC system		\$50,000				\$300,000		\$800,000		
Upgrade electrical syst.						\$30,000		\$70,000		
Upgrade plumbing syst.		\$30,000				\$30,000		\$50,000		
Upgrade		\$50,000				\$150,000		\$570,000		
Upgrade build. exterior		\$40,000				\$200,000		\$300,000		
Handicap compliance						\$150,000		\$50,000		
Upgrade Security System						\$20,000		\$10,000		
*Dwelling Equipment										
- PROJECT		\$245,992		35,300		\$1,035,300		\$2,070,000		\$0
OH16-015 SUNSHINE ANNEX										
*Administration costs		\$19,283		\$20,149		\$20,149		\$20,149		\$20,000
*Others: A/E		\$6,056		\$50,000						\$100,000
*Site Impr										
Repl./Upgr. Site Utilities										
Landscaping										
Site Lighting										
Parking / Side Wal		\$20,000								
*Dwelling Structure										
Upgrade		\$100,000								\$800,000
Upgrade				\$20,000						\$200,000
Upgrade plumbing syst.		\$80,000		\$20,000						\$200,000
Upgrade build. interior				\$636,666						\$250,000
Upgrade build. exterior		\$115,072		\$193,334						
Handicap compliance				\$50,000						\$30,000
Upgrade Security System				\$30,000						
*Dwelling Equipment										
TOTAL PROJECT		\$340,411		1,020,149		\$20,149		\$20,149		\$1,600,000
Subtotal of estim #####		#####		#####		#####		#####		#####

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COMPREHENSIVE GRANT PROG

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

Development Name Major Work Category	year 1 : 2001		year 2 : 2002		year 3 : 2003		year 4 : 2004		year 5 : 2005	
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost
OH16-020 MARION SQUARE										
*Administration costs		\$38,865		\$40,610		\$40,610		\$40,610		
*Others: A/E		\$12,207		\$0		\$0		\$0		
*Site Impr										
Repl./Upgr. Site Ut		\$20,000								
Landscaping		\$20,000								
Site Lighting										
Parking / Side Wal		\$10,000								
*Dwelling Structure										
Upgrade HVAC system										
Upgrade electrical syst.										
Upgrade plumbing syst.		\$40,000								
Upgrade		\$50,000								
Upgrade build. exterior		\$81,000								
Handicap compliance		\$10,927								
Upgrade Security System										
*Dwelling Equipment										
- PROJECT		\$282,999		40,610		\$40,610		\$40,610		\$0
OH16-033 KENMORE SQUARE										
*Administration costs		\$8,371		\$8,747		\$8,747		\$8,747		
*Others: A/E		\$2,629		\$1,692		\$1,692				
*Site Impr										
Repl./Upgr. Site Utilities										
Landscaping		\$10,000								
Site Lighting										
Parking / Side Wal		\$20,000								
*Dwelling Structure										
Upgrade										
Upgrade										
Upgrade plumbing syst.										
Upgrade build. interior										
Upgrade build. exterior		\$19,954		\$32,143		\$32,143				
Handicap compliance										
Upgrade Security System										
*Dwelling Equipment										
TOTAL PROJECT		\$60,954		42,582		\$42,582		\$8,747		\$0
Subtotal of estim #####				\$83,192		\$83,192		\$49,357		\$0

N

COMPREHENSIVE GRANT PROG

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

Development Name Major Work Category	year 1 : 2001		year 2 : 2002		year 3 : 2003		year 4 : 2004		year 5 : 2005	
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost
OH16-035 POST OAK STATION I										
*Administration costs		\$11,062		\$11,558		\$11,558		\$11,558		\$10,000
*Others: A/E		\$3,474		\$2,236		\$2,236				\$30,000
*Site Impr										
Repl./Upgr. Site Ut		\$20,000								
Landscaping		\$10,000								
Site Lighting										
Parking / Side Wal		\$10,000								
*Dwelling Structure										
Upgrade HVAC system										
Upgrade electrical syst.										
Upgrade plumbing syst.										
Upgrade										\$200,000
Upgrade build. exterior		\$26,010		\$42,475		\$42,475				\$290,000
Handicap compliance										
Upgrade Security System										
*Dwelling Equipment										
- PROJECT		\$80,546		56,269		\$56,269		\$11,558		\$530,000
OH16-046 POST OAK STATION II										
*Administration costs		\$11,660		\$12,183		\$12,183		\$12,183		\$10,000
*Others: A/E		\$3,662		\$2,356		\$2,356				\$20,000
*Site Impr										
Repl./Upgr. Site Utilities										
Landscaping		\$20,000								
Site Lighting										
Parking / Side Wal		\$15,000								
*Dwelling Structure										
Upgrade										
Upgrade										
Upgrade plumbing syst.										
Upgrade build. interior										\$90,000
Upgrade build. exterior		\$34,578		\$44,770		\$44,770				\$200,000
Handicap compliance										
Upgrade Security System										
*Dwelling Equipment										
TOTAL PROJECT		\$84,900		59,309		\$59,309		\$12,183		\$320,000
Subtotal of estim #####				#####		#####		\$23,741		#####

N

COMPREHENSIVE GRANT PROG

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

Development Name Major Work Category	year 1 : 2001		year 2 : 2002		year 3 : 2003		year 4 : 2004		year 5 : 2005	
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost
OH16-037 GLENVIEW ESTATE										
*Administration costs		\$7,474		\$7,810		\$7,810		\$7,810		
*Others: A/E		\$2,347		\$1,510		\$1,510				
*Site Impr										
Repl./Upgr. Site Utilities										
Landscaping		\$10,000								
Site Lighting										
Parking / Side Wal		\$10,000								
*Dwelling Structure										
Upgrade HVAC system										
Upgrade electrical syst.										
Upgrade plumbing syst.										
Upgrade										
Upgrade build. exterior		\$20,602		\$28,700		\$28,700				
Handicap compliance		\$4,000								
Upgrade Security System										
*Dwelling Equipment										
TOTAL PROJECT		\$54,423		38,020		\$38,020		\$7,810		\$0
OH16-038 MAPLEWOOD HEIGHTS										
*Administration costs		\$10,613		\$11,090		\$11,090		\$11,090		\$10,000
*Others: A/E				\$0		\$0		\$0		\$25,000
*Site Impr										
Repl./Upgr. Site Utilities										
Landscaping		\$10,000								
Site Lighting										
Parking / Side Wal		\$10,000								
*Dwelling Structure										
Upgrade										
Upgrade										
Upgrade plumbing syst.										
Upgrade build. interior		\$20,000								\$200,000
Upgrade build. exterior		\$23,334								\$190,000
Handicap compliance										
Upgrade Security System										
*Dwelling Equipment										
TOTAL PROJECT		\$73,947		11,090		\$11,090		\$11,090		\$425,000
Subtotal of estim #####				\$49,110		\$49,110		\$18,900		#####

N

COMPREHENSIVE GRANT PROG

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

Development Name Major Work Category	year 1 : 2001		year 2 : 2002		year 3 : 2003		year 4 : 2004		year 5 : 2005	
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost
OH16-039 BOLLINGER TOWER										
*Administration costs		\$14,948		\$15,619				\$15,619		\$15,619
*Others: A/E		\$4,695		\$0				\$0		\$0
*Site Impr										
Repl./Upgr. Site Utilities										
Landscaping										
Site Lighting										
Parking / Side Walks / Play Grounds										
*Dwelling Structure										
Upgrade HVAC system		\$100,000								
Upgrade electrical syst.		\$100,000								
Upgrade plumbing syst.										
Upgrade										
Upgrade build. exterior		\$89,203								
Handicap compliance										
Upgrade Security System										
*Dwelling Equipment										
TOTAL PROJECT		\$308,846		15,619		\$0		\$15,619		\$15,619
OH16-040 EASTMOOR SQUARE										
*Administration costs		\$7,923		\$8,278		\$8,278		\$8,278		
*Others: A/E		\$2,488		\$1,601		\$1,601				
*Site Impr										
Repl./Upgr. Site Utilities										
Landscaping										
Site Lighting										
Parking / Side Walks / Play Grounds										
*Dwelling Structure										
Upgrade										
Upgrade										
Upgrade plumbing syst.										
Upgrade build. interior										
Upgrade build. exterior		\$47,278		\$30,421		\$30,421				
Handicap compliance										
Upgrade Security System										
*Dwelling Equipment										
TOTAL PROJECT		\$57,689		40,300		\$40,300		\$8,278		\$0
Subtotal of estim #####				\$55,919		\$40,300		\$23,897		\$15,619

N

COMPREHENSIVE GRANT PROG

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

Development Name Major Work Category	year 1 : 2001		year 2 : 2002		year 3 : 2003		year 4 : 2004		year 5 : 2005	
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost
OH16-041 REEB HOSACK										
*Administration costs		\$4,036		\$4,217		\$4,217		\$4,217		
*Others: A/E		\$1,268		\$816		\$816				
*Site Impr										
Repl./Upgr. Site Utilities										
Landscaping										
Site Lighting										
Parking / Side Walks / Play Grounds										
*Dwelling Structure										
Upgrade HVAC system										
Upgrade electrical syst.										
Upgrade plumbing syst.										
Upgrade										
Upgrade build. exterior		\$24,084		\$15,498		\$15,498				
Handicap compliance										
Upgrade Security System										
*Dwelling Equipment										
TOTAL PROJECT		\$29,388		20,531		\$20,531		\$4,217		\$0
OH16-042 CANONBY COURT										
*Administration costs		\$7,474		\$7,810		\$7,810		\$7,810		
*Others: A/E		\$2,347		\$1,510		\$1,510				
*Site Impr										
Repl./Upgr. Site Utilities										
Landscaping										
Site Lighting										
Parking / Side Walks / Play Grounds										
*Dwelling Structure										
Upgrade										
Upgrade										
Upgrade plumbing syst.										
Upgrade build. interior										
Upgrade build. exterior		\$44,602		\$28,700		\$28,700				
Handicap compliance										
Upgrade Security System										
*Dwelling Equipment										
TOTAL PROJECT		\$54,423		38,020		\$38,020		\$7,810		\$0
Subtotal of estim		\$83,811		\$58,551		\$58,551		\$12,027		\$0

N

COMPREHENSIVE GRANT PROG

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

N

Development Name Major Work Category	year 1 : 2001		year 2 : 2002		year 3 : 2003		year 4 : 2004		year 5 : 2005	
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost
OH16-043 THORNWOOD COMMONS										
*Administration costs		\$12,855		\$13,433		\$13,433		\$13,433		\$10,000
*Others: A/E		\$4,038		\$2,598		\$2,598				\$20,000
*Site Impr										
Repl./Upgr. Site Utilities										
Landscaping										
Site Lighting										
Parking / Side Walks / Play Grounds										
*Dwelling Structure										
Upgrade HVAC system										
Upgrade electrical syst.										
Upgrade plumbing syst.										
Upgrade										\$90,000
Upgrade build. exterior		\$76,714		\$49,363		\$49,363				\$200,000
Handicap compliance										
Upgrade Security System										
*Dwelling Equipment										
TOTAL PROJECT		\$93,607		65,394		\$65,394		\$13,433		\$320,000
OH16-044 TRIVETT HEIGHT										
*Administration costs		\$20,479		\$21,398		\$21,398		\$21,398		
*Others: A/E		\$6,432		\$4,139		\$4,139				
*Site Impr										
Repl./Upgr. Site Utilities										
Landscaping										
Site Lighting										
Parking / Side Wal		\$50,000								
*Dwelling Structure										
Upgrade										
Upgrade										
Upgrade plumbing syst.										
Upgrade build. interior										
Upgrade build. exterior		\$72,507		\$78,636		\$78,636				
Handicap compliance										
Upgrade Security System										
*Dwelling Equipment										
TOTAL PROJECT		\$149,418		104,173		\$104,173		\$21,398		\$0
Subtotal of estim	#####		#####		#####		\$34,831		#####	

COMPREHENSIVE GRANT PROG

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

Development Name Major Work Category	year 1 : 2001		year 2 : 2002		year 3 : 2003		year 4 : 2004		year 5 : 2005	
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost
OH16-200 CMHA NEW OFFICE BUILDING										
*Administ										
*Others: A/E										
*Site Improvement										
Site Utilities										
Landscaping										
Parking / Side Walks										
*Dwelling Structure										
HVAC system										
Electrical syst.										
Plumbing system										
Building interior										
Building exterior										
Handicap compliance										
Security System										
*Dwelling Equipment										
TOTAL PROJECT		\$0		0		\$0		\$0		\$0
OH16-201 CMHA NEW MAINTENANCE BUILDING										
*Administration costs		\$0								
*Others: A/E		\$115,000								
*Site Impr										
Site Utilities		\$200,000								
Landscaping		\$50,000								
Parking / Side Wal		\$200,000								
*Dwelling Structure										
HVAC system		\$250,000								
Electrical		\$150,000								
Plumbing		\$140,000								
Building interior		\$358,000								
Building exterior		\$300,000								
Handicap compliance		\$30,000								
Security System		\$20,000								
*Dwelling Equipment										
TOTAL PROJECT		\$1,813,000		0		\$0		\$0		\$0
Subtotal of estim #####				\$0		\$0		\$0		\$0

N

COMPREHENSIVE GRANT PROG

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

Development Name Major Work Category	year 1 : 2001		year 2 : 2002		year 3 : 2003		year 4 : 2004		year 5 : 2005	
	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost	Quantity Lumpsum	Estimated Cost
CONSTRUCTION MAN		\$500,000		\$500,000		\$500,000		\$500,000		\$500,000
OH16-202 NEW CONSTRUCTION										
*Administ		\$0		\$0		\$0		\$0		
*Others: A/E		\$400,000		\$146,500		\$146,500		\$146,500		\$70,000
*Site Improvement				\$800,000		\$800,000		\$746,500		
Site Utilities										
Landscaping										
Parking / Side Walks										
*Dwelling Structure				\$1,500,000		\$1,500,000		\$1,005,465		\$1,195,000
HVAC system										
Electrical syst.										
Plumbing system										
Building i										
Building exterior										
Handicap compliance										
Security System										
*Dwelling Equipment										
TOTAL PROJECT		\$400,000		2,446,500		\$2,446,500		\$1,898,465		\$1,265,000
Subtotal or estim		\$900,000		\$2,946,500		\$2,946,500		\$2,398,465		\$1,765,000
OH16-013										
*Administration costs		\$42,347		\$40,764		\$40,764				
GRAND TOTAL	#####	#####	#####	#####	#####	#####	#####	#####	#####	#####

N

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

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

COMPREHENSIVE GRANT PROGRAM (CGP) 2001

	Development Name/No. Major Work Category	YEAR 1 : 2001		YEAR 2 : 2002		YEAR 3 : 2003		YEAR 4 : 2004		YEAR
		Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units
	OFF - DUT	OK	\$259,808		\$271,616		\$271,616		\$271,616	
#	PROJECT #									
1	OH16-001 F	414	\$52,855		\$55,258		\$55,258		\$55,258	
2	OH16-002 L	312	\$39,833		\$41,643		\$41,643		\$41,643	
3	OH16-003 F	128	\$16,342		\$17,084		\$17,084		\$17,084	
4	OH16-005 F	230	\$29,364		\$30,699		\$30,699		\$30,699	
5	OH16-020 M	260	\$33,194		\$34,703		\$34,703		\$34,703	
6	OH16-028 C	80	\$10,214		\$10,678		\$10,678		\$10,678	
7	OH16-033 K	56	\$7,150		\$7,474		\$7,474		\$7,474	
8	OH16-035 F	74	\$9,448		\$9,877		\$9,877		\$9,877	
9	OH16-037 C	50	\$6,383		\$6,674		\$6,674		\$6,674	
10	OH16-040 E	53	\$6,766		\$7,074		\$7,074		\$7,074	
11	OH16-041 F	27	\$3,447		\$3,604		\$3,604		\$3,604	
12	OH16-042 C	50	\$6,383		\$6,674		\$6,674		\$6,674	
13	OH16-043 T	86	\$10,980		\$11,479		\$11,479		\$11,479	
14	OH16-044 T	137	\$17,491		\$18,286		\$18,286		\$18,286	
15	OH16-046 F	78	\$9,958		\$10,411		\$10,411		\$10,411	
	SUB - TOTAL	2035	\$259,808		\$271,618		\$271,618		\$271,618	
	SECURITY	OK	\$302,942		\$316,711		\$316,711		\$316,711	
	PROJECT # & NAME									
1	OH16-006 S	180	\$30,077		\$31,444		\$31,444		\$31,444	
2	OH16-010 S	392	\$65,501		\$68,478		\$68,478		\$68,478	
3	OH16-012 J	194	\$32,416		\$33,890		\$33,890		\$33,890	
4	OH16-013 T	261	\$43,612		\$45,594		\$45,594		\$45,594	
5	OH16-014 V	226	\$37,763		\$39,480		\$39,480		\$39,480	
6	OH16-015 S	129	\$21,555		\$22,535		\$22,535		\$22,535	
7	OH16-020 M	260	\$43,445		\$45,419		\$45,419		\$45,419	
8	OH16-038 N	71	\$11,864		\$12,403		\$12,403		\$12,403	
9	OH16-039 E	100	\$16,709		\$17,469		\$17,469		\$17,469	
	SUB - TOTAL	1813	\$302,942		\$316,712		\$316,711		\$316,711	

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

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

COMPREHENSIVE GRANT PROGRAM (CGP) 2001

	Development Name/No. Major Work Category	YEAR 1: 2001		YEAR 2: 2002		YEAR 3: 2003		YEAR 4: 2004		YEAR
		Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units
	RESIDENT SPECIALIST		\$40,038		\$41,858		\$41,858		\$41,858	
#	PROJECT #									
1	OH16-001 F	414	\$8,145		\$8,516		\$8,516		\$8,516	
2	OH16-002 L	312	\$6,139		\$6,418		\$6,418		\$6,418	
3	OH16-003 F	128	\$2,518		\$2,633		\$2,633		\$2,633	
4	OH16-005 F	230	\$4,545		\$4,731		\$4,731		\$4,731	
5	OH16-020 M	260	\$5,115		\$5,348		\$5,348		\$5,348	
6	OH16-028 C	80	\$1,574		\$1,646		\$1,646		\$1,646	
7	OH16-033 K	56	\$1,102		\$1,152		\$1,152		\$1,152	
8	OH16-035 F	74	\$1,456		\$1,522		\$1,522		\$1,522	
9	OH16-037 C	50	\$984		\$1,028		\$1,028		\$1,028	
10	OH16-040 E	53	\$1,043		\$1,090		\$1,090		\$1,090	
11	OH16-041 F	27	\$531		\$555		\$555		\$555	
12	OH16-042 C	50	\$984		\$1,028		\$1,028		\$1,028	
13	OH16-043 T	86	\$1,692		\$1,769		\$1,769		\$1,769	
14	OH16-044 T	137	\$2,695		\$2,818		\$2,818		\$2,818	
15	OH16-046 F	78	\$1,535		\$1,604		\$1,604		\$1,604	
	SUB - TOTAL	2035	\$40,058		\$41,858		\$41,858		\$41,858	
	RES. SPECIALIST SEI		\$42,219		\$44,138		\$44,138		\$44,138	
	PROJECT # & NAME									
1	OH16-006 S	180	\$4,192		\$4,382		\$4,382		\$4,382	
2	OH16-010 S	392	\$9,128		\$9,543		\$9,543		\$9,543	
3	OH16-012 J	194	\$4,518		\$4,723		\$4,723		\$4,723	
4	OH16-013 T	261	\$6,078		\$6,354		\$6,354		\$6,354	
5	OH16-014 V	226	\$5,263		\$5,505		\$5,505		\$5,505	
6	OH16-015 S	129	\$3,004		\$3,141		\$3,141		\$3,141	
7	OH16-020 M	260	\$6,055		\$6,330		\$6,330		\$6,330	
8	OH16-038 M	71	\$1,653		\$1,729		\$1,729		\$1,729	
9	OH16-039 E	100	\$2,329		\$2,435		\$2,435		\$2,435	

	SUB - TOTA	1813	\$42,220	\$44,142	\$44,142	\$44,142	
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FIVE-YEAR ACTION PLAN
MANAGEMENT NEEDS
PART III: SUPPORTING PAGES

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

COMPREHENSIVE GRANT PROGRAM (CGP) 2001

	Development Name/No. Major Work Category	YEAR 1: 2001		YEAR 2: 2002		YEAR 3: 2003		YEAR 4: 2004		YEAR
		Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units
	MENTAL HEALTH LE		\$55,146		\$55,561		\$55,561		\$55,561	
#	PROJECT #									
1	OH16-006 S	180	\$5,276		\$5,516		\$5,516		\$5,516	
2	OH16-010 S	392	\$11,491		\$12,013		\$12,013		\$12,013	
3	OH16-012 J	194	\$5,687		\$5,945		\$5,945		\$5,945	
4	OH16-013 T	261	\$7,651		\$7,999		\$7,999		\$7,999	
5	OH16-014 V	226	\$6,625		\$6,926		\$6,926		\$6,926	
6	OH16-015 S	129	\$3,781		\$3,953		\$3,953		\$3,953	
7	OH16-020 M	260	\$7,622		\$7,968		\$7,968		\$7,968	
8	OH16-038 M	71	\$2,081		\$2,176		\$2,176		\$2,176	
9	OH16-039 E	100	\$2,931		\$3,065		\$3,065		\$3,065	
	SUB - TOTAL	1813	\$53,145		\$55,561		\$55,561		\$55,561	
	RESIDENT SERVICE I SECERTARY Rev2000)		\$85,289		\$89,165		\$89,165		\$89,165	
	PROJECT # & NAME									
1	OH16-001 F	414	\$9,841		\$10,288		\$10,288		\$10,288	
2	OH16-002 L	312	\$7,416		\$7,753		\$7,753		\$7,753	
3	OH16-003 F	128	\$3,043		\$3,181		\$3,181		\$3,181	
4	OH16-005 F	230	\$5,467		\$5,716		\$5,716		\$5,716	
5	OH16-006 S	180	\$4,279		\$4,473		\$4,473		\$4,473	
6	OH16-010 S	392	\$9,318		\$9,742		\$9,742		\$9,742	
7	OH16-012 J	194	\$4,612		\$4,821		\$4,821		\$4,821	
8	OH16-013 T	261	\$6,204		\$6,486		\$6,486		\$6,486	
9	OH16-014 V	226	\$5,372		\$5,616		\$5,616		\$5,616	
10	OH16-015 S	129	\$3,066		\$3,206		\$3,206		\$3,206	
11	OH16-020 M	260	\$6,180		\$6,461		\$6,461		\$6,461	
12	OH16-028 C	80	\$1,902		\$1,988		\$1,988		\$1,988	
13	OH16-033 K	56	\$1,331		\$1,392		\$1,392		\$1,392	
14	OH16-035 F	74	\$1,759		\$1,839		\$1,839		\$1,839	
15	OH16-037 C	50	\$1,189		\$1,243		\$1,243		\$1,243	
16	OH16-038 N	71	\$1,688		\$1,764		\$1,764		\$1,764	

	17	OH16-039 E	100	\$2,377	\$2,485	\$2,485	\$2,485
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**FIVE-YEAR ACTION PLAN
MANAGEMENT NEEDS
PART III: SUPPORTING PAGES
COMPREHENSIVE GRANT PROGRAM (CGP) 2000**

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

	Development Name/No. Major Work Category	YEAR 1: 2001		YEAR 2: 2002		YEAR 3: 2003		YEAR 4: 2004		YEAR
		Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units	Estimated Cost	Quantity Units
	RESIDENT SERVICE I SECERTARY (Rev2000)									
	PROJECT # & NAME									
	18 OH16-040 E	53	\$1,260		\$1,317		\$1,317		\$1,317	
	19 OH16-041 F	27	\$642		\$671		\$671		\$671	
	20 OH16-042 C	50	\$1,189		\$1,243		\$1,243		\$1,243	
	21 OH16-043 T	86	\$2,044		\$2,137		\$2,137		\$2,137	
	22 OH16-044 T	137	\$3,257		\$3,405		\$3,405		\$3,405	
	23 OH16-046 F	78	\$1,854		\$1,938		\$1,938		\$1,938	
	SUB - TOTAL	3588	\$85,289		\$89,165		\$89,165		\$89,165	
	GRAND TOT		\$783,462		\$819,056		\$819,055		\$819,055	

FORM HUD - 52834

5 : 2005
Estimated Cost
\$271,616
\$55,258
\$41,643
\$17,084
\$30,699
\$34,703
\$10,678
\$7,474
\$9,877
\$6,674
\$7,074
\$3,604
\$6,674
\$11,479
\$18,286
\$10,411
\$271,618
\$316,711
\$28,014
\$61,008
\$30,193
\$40,620
\$35,173
\$20,077
\$40,464
\$11,050
\$15,563
\$282,162

N

NAS

5 : 2005
Estimated Cost
\$41,858
\$8,516
\$6,418
\$2,633
\$4,731
\$5,348
\$1,646
\$1,152
\$1,522
\$1,028
\$1,090
\$555
\$1,028
\$1,769
\$2,818
\$1,604
\$41,858
\$44,138
\$3,904
\$8,502
\$4,208
\$5,661
\$4,902
\$2,798
\$5,639
\$1,540
\$2,169

\$39,323

NAS

5 : 2005
Estimated Cost
\$55,561
\$4,914
\$10,703
\$5,297
\$7,126
\$6,170
\$3,522
\$7,099
\$1,938
\$2,730
\$49,499
\$89,165
\$18,140
\$13,671
\$5,608
\$10,078
\$7,887
\$17,176
\$8,500
\$11,436
\$9,902
\$5,652
\$11,392
\$3,505
\$2,454
\$3,242
\$2,191
\$3,111

N

\$4,382

NAS

5 : 2005
Estimated Cost
\$2,322
\$1,183
\$2,191
\$3,768
\$6,003
\$3,418
\$157,212
\$841,672

NAS

COLUMBUS METROPOLITAN HOUSING AUTHORITY

Public Housing Drug Elimination Program Plan Fiscal Year 2001

Section 1: General Information/History

- A. Amount of PHDEP Grant \$1,000,100.00**
B. Eligibility type (Indicate with an "x") N1___ N2___ R___
C. FFY in which funding is requested 2001
D. Executive Summary of Annual PHDEP Plan

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

The Columbus Metropolitan Housing Authority has developed a strategy to reduce drug abuse and drug-related crime by implementing an in-house security program and providing enhanced on-site services for residents. The security program has replaced and expanded a failing contract security program that was in place at CMHA's high-rise properties and the new program increases coverage and responsiveness while providing support to management personnel. On-site services that include educational and recreational opportunities for young people and access to counseling and treatment services for youth, adults, and families is available to residents. The PHDEP Plan encompasses a wide variety of services such as the aforementioned security presence within targeted high-rise communities, Teen Centers, Computer Centers, an After School Program for youth between the ages of six (6) and twelve (12), an LISW that provides assessment, counseling, and referral services, an Adult Wellness Program, a sports program for youth, a meals program for children, credit counseling, and transportation for sports activities to reduce and eliminate drug abuse and drug-related crimes.

E. Target Areas

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

PHDEP Target Areas (Name of development(s) or site)	Total # of Units within the PHDEP Target Area(s)	Total Population to be Served within the PHDEP Target Area(s)
Lincoln Park	312	196
Sawyer Manor/Trevitt Heights	116/137	159
Riverside-Bradley	128	80
Poindexter Village	414	260

Sunshine Terrace	179	103
Taylor Terrace	264	82
Sunshine Annex	129	123
Worley Terrace	224	217
Sawyer Towers	391	327
Bollinger Tower	100	100

F. Duration of Program

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

6 Months ___ 12 Months ___ "x" ___ 18 Months ___ 24 Months ___ Other ___

G. PHDEP Program History

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

Fiscal Year of Funding	PHDEP Funding Received	Grant #	Fund Balance as of Date of this Submission	Grant Extensions or Waivers	Anticipated Completion Date
FY 1995	\$1,123,074	OH16DEP00 10195	\$0.00		
FY 1996	\$296,470	OH16DEP00 10196	\$0.00		
FY 1997					
FY 1998					
FY 1999	\$959,600.00	OH16DEP00 10199	\$835,515.00		12/31/01

Section 2: PHDEP Plan Goals and Budget

A. PHDEP Plan Summary

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

The Columbus Metropolitan Housing Authority has established goals and objectives for the PHDEP Plan. The first goal is to reduce the impact of drug-related crime on the Columbus Metropolitan Housing Authority by reflecting a long-term decrease of arrests and evictions for drug-related activities, and the objectives for this goal are to decrease arrests made in CMHA developments by 25%, decrease the number of evictions for drug-related activity by 50%, and increase to 50% of total hours that security management personnel spend walking the building and surrounding property in comparison to the hours spent sitting in the lobby. The second goal is to reduce the number of residents who engage in drug abuse, and the objectives are to increase to 15% the number of youth who regularly participate in after school activities and increase to 15% the number of adult residents who participate in drug elimination activities. Each objective has established annual milestones over a period of five (5) years with baseline data being collected in the first year (2000) of the PHDEP Plan implementation. Each partner providing services within the targeted CMHA communities has established goals and objectives for the individual actions to be furnished. The monitoring and evaluating process of each service provider will be completed through monthly or quarterly reports provided to the Columbus Metropolitan Housing Authority as well as monthly or quarterly meetings to address concerns raised by the provider or CMHA. The reports and meetings will help to identify whether the goals and objectives are being met and will assist CMHA to meet the goals and objectives defined in the PHDEP Plan.

B. PHDEP Budget Summary

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

FY _____ PHDEP Budget Summary	
Budget Line Item	Total Funding
9110 - Reimbursement of Law Enforcement	
9120 - Security Personnel	\$526,785.00
9130 - Employment of Investigators	
9140 - Voluntary Tenant Patrol	
9150 - Physical Improvements	
9160 - Drug Prevention	\$405,686.00

9170 - Drug Intervention	\$10,000.00
9180 - Drug Treatment	
9190 - Other Program Costs	\$57,629.00
Total PHDEP Funding	\$1,000,100.00

C. PHDEP Plan Goals and Activities

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

9110 Reimbursement of Law Enforcement				Total PHDEP Funding: \$			
Goal(s)							
Objective(s)							
Proposed Activities	# of Persons Served	Target Population	Start Date	Expected Complete Date	PHDEP Funding	Other Funding (Amount/ Source)	Performance Indicators
1.							
2.							
3.							

9120 Security Personnel				Total PHDEP Funding: \$526,785.00			
Goal(s)	Improve and increase coverage and responsiveness in the targeted high-rise communities.						
Objective(s)	Assign security staff to targeted high-rise communities to achieve the established goal.						
Proposed Activities	# of Persons Served	Target Population	Start Date	Expected Complete Date	PHDEP Funding	Other Funding (Amount /Source)	Performance Indicators

1.Security support officers on staff			1/1/01	12/31/01	\$516,785		1.Increase in investigations. 2.The long term expectation is a decrease in incidents.
2.Purchase Equipment			1/1/01	12/31/01	\$10,000		1.Increase in investigations. 2. The long term expectation is a decrease in incidents.

9130 Employment of Investigators				Total PHDEP Funding: \$			
Goal(s)							
Objective(s)							
Proposed Activities	# of Persons Served	Target Population	Start Date	Expected Complete Date	PHDEP Funding	Other Funding (Amount/ Source)	Performance Indicators
1.							

1.							
2.							
3.							

9160 Drug Prevention				Total PHDEP Funding: \$405,686.00			
Goal(s)	To reduce drug-related crime as well as reduce the number of evictions from drug-related activity. To reduce the number of residents who engage in drug use.						
Objective(s)	Provide community-based drug prevention services to four (4) family communities.						
Proposed Activities	# of Persons Served	Target Population	Start Date	Expected Complete Date	PHDEP Funding	Other Funding (Amount/ Source)	Performance Indicators
1. Youth After School Program			1/1/01	12/31/01	\$69,000		1. Increase 3 to 6% participation of youth in after school activities.
2. Teen Centers			1/1/01	12/31/01	\$118,300		1. Increase 3 to 6% participation of youth in after school activities.
3. Computer Centers/Training			1/1/01	12/31/01	\$9,900		1. Increase 3 to 6% participation of youth in after school activities.

4. LISW			1/1/01	12/31/01	\$60,000		1. Increase 3 to 6 % participation of youth in drug elimination activities.
5. Adult Wellness Program			1/1/01	12/31/01	\$46,400		1. Increase 3 to 6 % participation of youth in drug elimination activities.
6. Meals Program			1/1/01	12/31/01	\$3,000		1. Increase 3 to 6% participation of youth in after school activities.
7. Youth Sports and Recreational Activities			1/1/01	12/31/01	\$75,326		1. Increase 3 to 6% participation of youth in after school activities.
8. Credit Counseling			1/1/01	12/31/01	\$3000		1. Increase 3 to 6 % participation of youth in drug elimination activities.

9. Immigrant /Refugee Tutoring			1/1/01	12/31/01	\$20,760		1. Increase 3 to 6% participation of youth in after school activities.
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9170 Drug Intervention				Total PHDEP Funding: \$10,000.00			
Goal(s)	To provide transportation to sporting activities for youth to eliminate barriers to participating in after school activities.						
Objective(s)	Contract with a service provider to provide transportation for youth.						
Proposed Activities	# of Persons Served	Target Population	Start Date	Expected Complete Date	PHDEP Funding	Other Funding (Amount/ Source)	Performance Indicators
1. Service provider to provide transportation			1/1/01	12/31/01	\$10,000		
2.							
3.							

9180 Drug Treatment		Total PHDEP Funding: \$	
Goal(s)			
Objective(s)			

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

9190 Other Program Cost				Total PHDEP Funding: \$57,629			
Goal(s)	Fund Grant Coordinator, provide PHDEP training, and complete resident survey.						
Objective(s)	Provide coordination and evaluation of all programs and services.						
Proposed Activities	# of Persons Served	Target Population	Start Date	Expected Complete Date	PHDEP Funding	Other Funding (Amount/ Source)	Performance Indicators
1. Grant Coordinator			1/1/01	12/31/01	\$52,000		1. Increase monitoring and evaluating
2. Resident Survey					\$2,629		1. Increase knowledge of resident needs.
3. PHDEP Conference					\$3,000		1. Increase knowledge of PHDEP

Section 3: Expenditures/Obligation Milestones

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

Budget Line Item #	25% Expenditure of Total Grant Funds By Activity #	Total PHDEP Funding Expended (sum of the activities)	50% Obligation of Total Grant Funds by Activity #	Total PHDEP Funding Obligated (sum of the activities)
<i>e.g. Budget Line Item #9120</i>	<i>Activities 1, 3</i>		<i>Activity 2</i>	
9110				
9120				
9130				
9140				
9150				
9160				
9170				
9180				
9190				
TOTAL		\$		\$

Section 4: Certifications

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

QUESTIONS, ANSWERS AND COMMENTS OF SENIOR RESIDENT ADVISORY BOARD

Question: Can we get occupied units painted?

Answer: We do not have staff to routinely paint the occupied units although we would like to. Maybe we could provide paint and a list of approved vendors if a tenant wanted to paint their own unit.

Comment: Units need to have extermination services more than every six months.

Answer: We have services set up for every six months because we were getting complaints on the more frequent periods being too bothersome to tenants. We will exterminate units with problems more frequently or as needed. To do a proper extermination the vendors tell us that everything should be taken out of cabinets and closets.

Question: Will Sunshine Terrace and Jenkins be torn down like Taylor Terrace?

Answer: This will depend on a number of factors such as the cost to remodel the buildings, safety issues. Regarding Sunshine Terrace - CMHA would like to reach an agreement with the City, some service providers in order to rehabilitate the building. But if not, demolition and disposition will take place.

Question: What's going to happen with Worley?

Answer: Worley will be a problem for CMHA in the future. Worley has about 226 units. Seniors are in the cottages and the young people are in the high-rise buildings. The buildings were built in 1968; the buildings are very hard to secure and need rehabilitating.

Comment: CMHA will re partnering with other organizations that will be building housing for some of the units lost from Taylor Terrace. Case Road will be the location for one of the housing development.

QUESTIONS, ANSWERS AND COMMENTS OF FAMILY RESIDENT ADVISORY BOARD

960 BUILDING EVALUATED FOR DISPOSITION

No comments

SUNSHINE TERRACE - YMCA

No comments

PRCDR FAMILY SELF-SUFFICIENCY

Q. inquired why residents are not part of PRC and/or IDA and no information.

A. All residents can participate in the program and brochures will be mailed out to all residents including Section 8 clients.

Q. If someone is working and does not want any training from PRC can they still participate in the IDA program.

A. No, but CHP has a program similar to the IDA program.

CONTINUED SUPPORT FOR FOUR CORNERS DEVELOPMENT

No comments

TAYLOR TERRACE

No comments

HOME OWNERSHIP- SOUTH LINDEN

No comments

REBUILDING LIVES

No comments

DECONCENTRATION OF POVERTY

Q. With Census tracking does that mean one development is better than the other?

A. Income levels are taken into consideration.

SCATTERED SITES DISPOSITION

Q. What opportunity do residents of SS have to obtain homes?

A. Highest bidder with bank financing.

MIXED INCOME COMMUNITIES

No comments

ELDERLY HOUSING UNITS

Q. What is HUD saying about this?

A. HUD has agreed.

Q. Will there be a waiting list and where will they be located?

A. There will be a waiting list for 20 senior residents and no location has been decided but it will be in an suburb area.

Q. Seniors can not get to the residency.

A. The demand for senior housing is not in central city. Senior are demanding a more quiet area away from the city.

COMMUNITY SERVICE PUBLIC HOUSING ADULTS

Q. How can you track the reliability of the source of community services?

A. Still working on it.

Q. Is this only for people 18 and over, not working, or not in school or training?

A. yes

Q. Can one volunteer hours for the Resident Council?

A. yes.

Q. Will someone be hired to track the hours?

A. Present staff will do the tracking.

Comments on rule:

8 hours is not enough hours. There needs to be more hours. Ms. Radden wants to go on record saying that she has a problem families this rule.

PET POLICY

Q. Will there be insurance if the dog bites someone?

A. That is not a requirement of the HA, because the isn't a policy on maintaining renters insurance.

Q. Is there a deposit for pets?

A. There is an extra \$25 per month. HA is considering deposit because afer residents moving HA has to deflea etc. so you don't get deposit back.

Q. If residents has illegal dog what is HA action.

A. HA will evict residents as far as damages go individual will have to sue.

Q. When will policy be effective?

A. Effective Oct 1, 2000, will be implemented January 1, 2001.

Q. If resident has a pet will the rent increase?

A. yes, \$25.00 dollars.

Comments on rule:

If dogs are let in family communities there will be a problem and it will get out of hand. The deposit and the monthly fee should be raised higher to deter residents from having pets. No dog policy!

SUPPORT OF ELDERLY HOUSING NEEDS ASSESSMENT

No comments

QUESTIONS, ANSWERS AND COMMENTS RECEIVED AT PUBLIC HEARING FOR AGENCY PLANS

Comment: Margaret Willis-Radden would like to be placed on the mailing list to receive the minutes from CMHA' Board Meeting.

Question: How much money will scattered site be receiving?

Answer: In response to notices on job training, tenant in the six developments have been located, Section Eight and public housing residents will get a flyer about the program (hours of operation, type of training) and residents can go to any one of the programs and sign up. The notices will probably be mailed during the week of October 23, 2000.
Scattered Sites will be included.

Question: Regarding the YMCA and PRCDR programs, has CMHA taken into account how the referral of individuals for legal counsel on job issues and legal barriers would be handled? Legal Aid has received a PRCDR grant.

Answer: In terms of the YMCA program, nothing has been finalized and the discussion has been to get together with the YMCA and Legal Aid to discuss specifics. With respects to PRCDR, CMHA has not gone very far. CMHA needs to know exactly what the grant is for and then CMHA will inform the other organizations how the grant will be used.

Comment: Regarding terminations coming up, the county has a list of hardship exemptions and Legal Aid thinks that it would be good if the organizations could get that information to the necessary people.

Question: Regarding Taylor Terrace and developing homes, is there in the next year a net loss of units in public housing (public housing and with the owners)?

Answer: Overall, there is a net increase in subsidized housing, but a net decrease in terms of the property we own.

Question: What's going to happen to families when their time limits are up for Welfare?

Answer: If a family time limit runs out and they come into the HA, CMHA will lower their rent to zero. The federal law says that if someone gets cut off of welfare just because of time limits the rent will be reduced to zero. But if someone gets cut off of welfare or get payments cut because of sanctions then the HA will not lower the rents.

Comment: Legal Aid questioned whether or not the \$25 monthly fee being charged to tenants for a pet is a nominal fee.

Answer: CMHA believes the \$25 monthly fee is nominal.

Question: Does the same \$25 monthly fee apply to scattered site residents that have pets?

Answer: If the scattered site resident does not fall under 504, the \$25 fee will apply.

Question: Why does the 35-pound pet policy apply to scattered sites?

Answer: CMHA has the comment and will think about it.

Comment: Local people should be included in the comprehensive study for elderly housing.

Answer: The study will not be done by CMHA. CMHA will hire a firm. The firm would know who to talk with and what to look at.

Attachment G

**SOCIAL SERVICE PROGRAMS BY COMMUNITIES
CMHA FAMILY COMMUNITIES**

FAMILY COMMUNITY	COMMUNITY ACTIVITIES	SERVICE PROVIDERS	PENDING ACTIVITIES	SERVICE PROVIDERS FOR PENDING ACTIVITIES
CANONBY COURT	<p>INOCULATIONS FROM THE HEALTH DEPT.</p> <p>COMPUTER CLASS FROM SOUTH PARK</p> <p>BLOCK WATCH</p> <p>BACK TO SCHOOL PARTY</p> <p>HAT AND GLOVE GIVE-A-WAY</p> <p>EASTER EGG HUNT</p> <p>SECRET SANTA (Zoo trips, Clippers game night, toy give-a-way)</p> <p>REFERRAL BROCHURES ON SITE (First Link)</p> <p>SUMMER FOOD PROGRAM</p> <p>PIC YOUTH PROGRAM</p>	<p>HEALTH DEPT.</p> <p>SOUTH PARK</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT SERVICES</p> <p>RESIDENT SERVICES</p> <p>RESIDENT COUNCIL, OHIO HUNGER TASK FORCE</p> <p>RESIDENT COUNCIL, PIC</p>	<p>LATCHKEY PROGRAM</p> <p>SPORTS PROGRAM</p> <p>TEEN COUNCIL</p> <p>VISTA WORKER SITE</p>	<p>OHIO HUNGER TASK FORCE, YMCA, 4H, VARIOUS PUBLIC SCHOOLS</p> <p>LARRY GRIFFIN, CMHA, GREATER TABERNACLE CHURCH, PARK AND REC, COLUMBUS FOUNDATION</p> <p>RESIDENT COUNCIL</p> <p>VISTA, RESIDENT SERVICES, RESIDENT COUNCIL</p>

FAMILY COMMUNITY	COMMUNITY ACTIVITIES	SERVICE PROVIDER	PENDING ACTIVITIES	SERVICE PROVIDER FOR PENDING ACTIVITIES
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EASTMOOR SQUARE	<p>CITY YEAR ANNUAL COMMUNITY CLEAN-UP</p> <p>SECRET SANTA (Zoo trips, Clippers night, toy give-a-way)</p> <p>DRAMA</p> <p>REFERRAL BROCHURES ON SITE (First Link)</p> <p>SUMMER FOOD PROGRAM</p> <p>PIC YOUTH PROGRAM</p> <p>OUT DOOR CAMP</p> <p>KIDS'DAY</p> <p>ARGOSY TRIP</p> <p>SCHOOL SUPPLY GIVEAWAY</p> <p>YARD SALE</p> <p>TALENT SHOW</p> <p>HARVEST PARTY</p> <p>TURKEY RAFFLE</p> <p>CHRISTMAS PARTY</p>	<p>CITY YEAR, RESIDENT COUNCIL</p> <p>RESIDENT SERVICES</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT SERVICES</p> <p>OHIO HUNGER TASK FORCE,</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>PIC</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p>	<p>SPORTS PROGRAM</p> <p>LATCHKEY PROGRAM</p> <p>TEEN COUNCIL</p>	<p>LARRY GRIFFIN, GREATER TABERNACLE CHURCH, PARK AND REC, COLUMBUS FOUNDATION</p> <p>OHIO HUNGER TASK FORCE, YMCA, 4H, VARIOUS PUBLIC SCHOOLS, RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p>
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FAMILY COMMUNITY	COMMUNITY ACTIVITIES	SERVICE PROVIDER	PENDING ACTIVITIES	SERVICE PROVIDER FOR PENDING ACTIVITIES
<p>GLENVIEW ESTATES</p>	<p>CHILDREN'S VALENTINE PARTY</p> <p>SECRET SANTA <i>(Zoo trips, Clippers night, toy give-a-way)</i></p>	<p>RESIDENT COUNCIL</p> <p>RESIDENT SERVICES</p>	<p>SPORTS PROGRAM</p>	<p>LARRY GRIFFIN, GREATER TABERNACLE CHURCH, PARK AND REC, COLUMBUS FOUNDATION</p>
	<p>REFERRAL BROCHURES ON SITE <i>(First Link)</i></p>	<p>RESIDENT SERVICES</p>	<p>COMPUTER CENTER</p> <p>TEEN COUNCIL</p>	<p>CMHA</p> <p>RESIDENT COUNCIL</p>

<p>INDIAN MEADOWS <i>(Just completed construction, resident council pending)</i></p>			<p>REFORM RESIDENT COUNCIL</p>	<p>RESIDENT SERVICES</p>
<p>FAMILY COMMUNITY</p>	<p>COMMUNITY ACTIVITIES</p>	<p>SERVICE PROVIDER</p>	<p>PENDING ACTIVITIES</p>	<p>SERVICE PROVIDER FOR PENDING ACTIVITIES</p>
<p>KENMORE SQUARE <i>(No Resident Council)</i></p>			<p>FORM RESIDENT COUNCIL AFTER SCHOOL PROGRAM</p>	<p>RESIDENT SERVICES OHIO HUNGER TASK FORCE, 4H, YMCA, VARIOUS PUBLIC SCHOOLS</p>

<p>LINCOLN PARK <i>(No Resident Council)</i></p>	<p>ENGLISH LITERACY CLASSES</p> <p>SUMMER FOOD PROGRAM</p> <p>REFERRAL BROCHURES ON SITE <i>(First Link)</i></p> <p>HEAD START</p> <p>PRC SITE *</p>	<p>CRIS</p> <p>RESIDENT COUNCIL (REEB HOSACK), OHIO HUNGER TASK FORCE</p> <p>RESIDENT SERVICES</p> <p>JOHN 23RD</p> <p>C.R.I.S. *</p>	<p>REFORM RESIDENT COUNCIL</p> <p>LATCHKEY PROGRAM</p> <p>COMPUTER CENTER</p> <p>SPORTS PROGRAM</p> <p>PHDEP SITE</p>	<p>RESIDENT SERVICES</p> <p>OHIO HUNGER TASK FORCE, 4H, YMCA, VARIOUS PUBLIC SCHOOLS</p> <p>CMHA</p> <p>LARRY GRIFFIN, GREATER TABERNACLE CHURCH, PARK AND REC, COLUMBUS FOUNDATION</p> <p>**SEE BELOW</p>
<p>FAMILY COMMUNITY</p>	<p>COMMUNITY ACTIVITIES</p>	<p>SERVICE PROVIDER</p>	<p>PENDING ACTIVITIES</p>	<p>SERVICE PROVIDER FOR PENDING ACTIVITIES</p>

OHIO TOWNHOUSES <i>(No Resident Council & No community space)</i>			ACQUIRE MEETING SPACE FOR COMMUNITY MEETINGS & PROGRAMS FORM RESIDENT COUNCIL	RESIDENT SERVICES RESIDENT SERVICES
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<p>POINDEXTER VILLAGE</p>	<p>OLDIES BUT GOODIES NIGHT</p> <p>SECRET SANTA (Zoo trip, Clippers night, toy give-a-way)</p> <p>HEAD START</p> <p>TEEN PROGRAM</p> <p>COMPUTER CENTER</p> <p>YOUTH RECOGNITION CELEBRATION</p> <p>ENGLISH LITERACY CLASSES</p> <p>COVERED DISH DINNERS</p> <p>REFERRAL BROCHURES ON SITE (<i>First Link</i>)</p> <p>PRC SITE *</p>	<p>RESIDENT COUNCIL</p> <p>RESIDENT SERVICES</p> <p>JOHN XXIII</p> <p>HRN COUNSELING</p> <p>CMHA & HRN COUNSELING</p> <p>RESIDENT COUNCIL & PROPERTY MANAGEMENT</p> <p>CRIS</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT SERVICES</p> <p>T.E.A.C.H *</p>	<p>LATCHKEY PROGRAM</p> <p>SPORTS PROGRAM</p> <p>PHDEP SITE</p> <p>SENIOR LUNCH PROGRAM</p> <p>HEALTH CARE RESIDENCY PROGRAM</p>	<p>OHIO HUNGER TASK FORCE, 4H, YMCA, VARIOUS PUBLIC SCHOOLS</p> <p>LARRY GRIFFIN, GREATER TABERNACLE CHURCH, PARK AND REC, COLUMBUS FOUNDATION</p> <p>**SEE BELOW</p> <p>LIFECARE ALLIANCE</p> <p>OSU MEDICAL SCHOOL</p>
<p>FAMILY COMMUNITY</p>	<p>COMMUNITY ACTIVITIES</p>	<p>SERVICE PROVIDER</p>	<p>PENDING ACTIVITIES</p>	<p>SERVICE PROVIDER FOR PENDING ACTIVITIES</p>

<p>POST OAK STATION</p>	<p>TEEN COUNCIL</p> <p>DANCE CLASS</p> <p>AEROBIC CLASS</p> <p>EASTER EGG HUNT</p> <p>MOTHER DAY CEREMONY</p> <p>YOUTH RECOGNITION CEREMONY</p> <p>TRIP TO WYANDOTTE LAKE</p> <p>FAMILY DAY</p> <p>GOSPEL FEST</p> <p>COMMUNITY THANKSGIVING DINNER</p> <p>COMMUNITY CHRISTMAS PARTY</p> <p>SECRET SANTA (Zoo trips, Clippers night, toy give-a-way)</p> <p>REFERRAL BROCHURES ON SITE <i>(First Link)</i></p> <p>SUMMER FOOD PROGRAM</p> <p>PIC YOUTH PROGRAM</p> <p>PRC SITE *</p>	<p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT COUNCIL</p> <p>RESIDENT SERVICES</p> <p>RESIDENT SERVICES</p> <p>RESIDENT COUNCIL, OHIO HUNGER TASK FORCE</p> <p>RESIDENT COUNCIL, PIC</p> <p>H.O.S.T *</p>	<p>LATCHKEY PROGRAM</p> <p>SPORTS PROGRAM</p> <p>VISTA WORK SITE</p>	<p>OHIO HUNGER TASK FORCE, 4H, YMCA, SW PUBLIC SCHOOLS, COLUMBUS FOUNDATION <i>(Funding is Complete for equipment and staffing)</i></p> <p>LARRY GRIFFIN, GREATER TABERNACLE CHURCH, PARK AND REC, COLUMBUS FOUNDATION</p> <p>VISTA, RESIDENT SERVICES, RESIDENT COUNCIL</p>
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FAMILY COMMUNITY	COMMUNITY ACTIVITIES	SERVICE PROVIDER	PENDING ACTIVITIES	SERVICE PROVIDER FOR PENDING ACTIVITIES
REEB HOSAK	SECRET SANTA (Zoo trip, Clippers night, toy give-a-way) SUMMER FOOD PROGRAM	RESIDENT SERVICES RESIDENT COUNCIL, OHIO HUNGER TASK FORCE		

<p>RIVERSIDE BRADLEY <i>(Resident Council has just reformed as of 7/21/99)</i></p>	<p>PRC SITE *</p>	<p>COLUMBUS WORKS *</p>	<p>COMPUTER CENTER SPORTS PHDEP SITE</p>	<p>CMHA LARRY GRIFFIN, GREATER CHURCH TABERNACLE, COLUMBUS FOUNDATION, PARK AND REC **SEE BELOW</p>
<p>FAMILY COMMUNITY</p>	<p>COMMUNITY ACTIVITIES</p>	<p>SERVICE PROVIDER</p>	<p>PROPOSED ACTIVITIES</p>	<p>SERVICE PROVIDER FOR PROPOSED ACTIVITIES</p>

SAWYER MANOR TREVITT HEIGHTS <i>(Sawyer Manor under construction, no resident council)</i>	TEEN PROGRAM HEAD START & CHILD CARE	NEIGHBORHOOD HOUSE AT NEIGHBORHOOD HOUSE	FORM RESIDENT COUNCIL COMPUTER CENTER LATCHKEY PROGRAM DOL GRANT ENGLISH LITERACY CLASSES PHDEP SITE	RESIDENT SERVICES CMHA OHIO HUNGER TASK FORCE, RESIDENT COUNCIL, & NEIGHBORHOOD HOUSE URBAN LEAGUE CRIS **SEE BELOW
THORNWOOD COMMONS <i>(No resident council)</i>			FORM RESIDENT COUNCIL LATCHKEY PROGRAM DOL GRANT	RESIDENT SERVICES OHIO HUNGER TASK FORCE URBAN LEAGUE

**PHDEP GRANT

PROPOSAL INCLUDES THE FOLLOWING SERVICES: LATCHKEY FUNDING; TEEN PROGRAM FUNDING; SPORTS PROGRAM FUNDING; ADULT SOCIALIZATION & LIFE SKILL FUNDING; AOD SERVICES, CASE MANAGEMENT, INDIVIDUAL, FAMILY AND GROUP COUNSELING SERVICES; AND CREATION OF COMPUTER CENTERS WITH TRAINING FOR YOUTH AND ADULTS.

PENDING ACTIVITIES FOR ALL COMMUNITIES

- Eligibility worker from Department of Human Services
- Free Computer Software from First Link *(Software received, not yet distributed)*
- IDA program with CHP, CMACAO, Compact, and Legal Aid *(waiting on response from several funding sources)*.
- Women support group with Beverly Frierson from Columbus Aids Task Force.
- Boy Scouts
- Pregnancy services from Concord
- Drop in center for Job Source and resumes from the Work Source *(computers procured, still waiting for ISP and word processing software)*.
- Expansion of partnership with Columbus State for job preparation, education, job placement, vocational training, etc.

CONTINUOUS ACTIVITIES

- Newsletters containing information regarding job information, job fair, job preparation, job education, work source, health, education, grants, scholarships, child care, and community activities.

*PRC

Employment Enrichment Specialist @ Site
 Job Training, placement, coaching, access to Columbus State for Degree Programs
 IDA, PRC Emergency Funds & Transportation are all included in grant through FCDHS.
 All communities will be marketed through PRC grant (sites marked actually house programs)

Attachment G

CMHA SENIOR COMMUNITIES

SENIOR COMMUNITY	COMMUNITY ACTIVITIES	SERVICE PROVIDERS	PENDING ACTIVITIES	SERVICE PROVIDERS FOR PENDING ACTIVITIES
<p><u>BOLLINGER</u></p> <p>(COUNCIL INACTIVE)</p>	<p>CONGREGATE MEALS</p> <p>BUILDING MONITOR</p> <p>ON SITE LAUNDRY</p>	<p>LIFECARE ALLIANCE</p> <p>CMHA</p> <p>COINMACH</p>	<p>24 HOUR SECURITY</p>	<p>PHDEP GRANT</p>

<u>JENKINS TERRACE</u>	BINGO	RESIDENT COUNCIL	FITNESS CENTER	YMCA
	BANKING SERVICES	BANK ONE	ON SITE REFERRAL SERVICE	ED/SS GRANT
	BIBLE STUDY	COUNCIL	WEEKEND SOCIAL ACTIVITY	COUNCIL
	MONTHLY POTLUCK	COUNCIL	EXPANSION OF HEALTHCARE	
	TRANSPORT	CMACAO	BOOKMOBILE	ED/SS GRANT
	HEALTH NURSE	LIFECARE ALLIANCE		FRANKLIN COUNTY LIBRARY
	SANTA CALLS	NATIONWIDE INSURANCE	COMPETITIVE GAMES	COUNCIL RESIDENT SERVICES
	HALL MONITORS ANNUAL DINNER	RESIDENT COUNCIL	DRAMA	REC. & PARKS
	ANNUAL DINNER	MT. ZION BAPTIST CHURCH	ARTS & CRAFTS	REC. & PARKS
	ANNUAL DINNER	BLACK POLICEMAN COUNCIL	CERAMICS	REC. & PARKS
	CHRISTMAS & THANKSGIVING DINNER	COUNCIL	24 HOUR SECURITY	PHDEP GRANT
	ANNUAL TRIPS	COUNCIL		
	BOLTON FIELD PICNIC	REC. & PARK		
	RECREATION	CMHA		
	CARE CALLERS	LIFECARE		
	MEALS	COINMACH		
	LAUNDRY SITE	COUNCIL		
	HARMONY BALL	KROGER		
	BREAD DELIVERY			

<u>MAPLEWOOD HEIGHTS</u>	ANNUAL TRIPS ARTS & CRAFTS MONTHLY SHOPPING TRIP BOLTON FIELD PICNIC HARMONY BALL HOLIDAY TRIPS CARE CALLERS WELLNESS NURSE ON SITE LAUNDRY CONGREGATE MEALS	COUNCIL COUNCIL COUNCIL COUNCIL COUNCIL COUNCIL CMHA LIFECARE ALLIANCE COINMACH LAUNDRY LIFECARE ALLIANCE	HEALTH FAIRS WELLNESS CENTER EXPANSION OF HEALTH CARE ACCESSIBLE TRANSPORT ON SITE REFERRAL SERVICES GREATER SOCIAL ACTIVITIES	COLUMBUS HEALTH DEPT. LIFECARE ALLIANCE COLUMBUS HEALTH DEPT. ED/SS GRANT ED/SS GRANT RESIDENT SERVICES
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<u>MARION SQUARE</u>	<p>CONGREGATE MEALS</p> <p>WELLNESS CENTER</p> <p>FINANCIAL SUPPORT</p> <p>ON SITE LAUNDRY</p> <p>ANNUAL TRIPS</p> <p>TRANSPORT</p> <p>HOLIDAY MEALS & TRIPS</p> <p>BOLTON FIELD PICNIC</p> <p>HARMONY BALL</p>	<p>LIFECARE ALLIANCE</p> <p>LIFECARE ALLIANCE</p> <p>LIFECARE ALLIANCE</p> <p>CRANE PLASTICS</p> <p>COINMACH LAUNDRY</p> <p>COUNCIL</p> <p>CMACAO</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p>	<p>HEALTH FAIRS</p> <p>BUS TRANSPORT</p> <p>EXPANSION OF HEALTH CARE</p> <p>SECURITY</p> <p>ACCESSIBLE TRANSPORT</p>	<p>COLUMBUS HEALTH DEPT.</p> <p>COTA</p> <p>ED/SS GRANT</p> <p>PHDEP GRANT</p> <p>ED/SS GRANT</p>
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<u>SAWYER TOWERS</u>	BEAUTY SHOP	PRIVATE PROVIDER	FITNESS CENTER	YMCA
	BANKING	BANK ONE	ON SITE REFERRAL	ED/SS GRANT
	MENTAL HEALTH SERVICES	COLUMBUS AREA COMM. MENTAL HEALTH	EXPANSION OF CARE CALLER SERVICES	CMHA
	ON SITE LAUNDRY	COINMACH LAUNDRY	WEEKEND SOCIAL ACTIVITIES	SELF/CMHA
	THRIFT SHOP	COUNCIL	EXPANSION OF HEALTH CARE	
	TRANSPORT	ST. STEVENS & CMACAO	BOOK MOBILE	ED/SS GRANT
	CONGREGATE MEALS	LIFECARE ALLIANCE	COMPETITIVE GAMES	COLUMBUS LIBRARY
	BINGO	COUNCIL		COUNCIL RESIDENT SERVICES
	BIBLE STUDY	COUNCIL	DRAMA	
	HALL MONITORS	CMHA	ARTS. & CRAFTS''	REC. & PARKS
	ANNUAL TRIPS		CERAMICS	REC. & PARKS
	BREAKFAST	COUNCIL	WELLNESS PROGRAM	REC. & PARKS
	LIBRARY	COUNCIL	HEALTH FAIR	YMCA
	BREAD DELIVERY	KROGER		
	BOLTON FIELD PICNIC		SUPPORTIVE SERVICE	COLUMBUS HEALTH DEPT.
	HARMONY BALL	COUNCIL	EXPANDED SECURITY	COAAA
	HOLIDAY DINNERS & TRIPS	COUNCIL	COMMUNITY HEALTH CENTER	PHDEP GRANT
		COUNCIL		COLUMBUS HEALTH DEPT.

<u>SUNSHINE TERRACE</u> <u>AND ANNEX</u>	CONGREGATE MEALS ON SITE LAUNDRY TRANSPORT CONGREGATE HOUSING SERVICES PROGRAM MENTAL HEALTH SERVICES RECREATION WELLNESS CENTER BUILDING MONITOR SHOPPING SECURITY BINGO BIBLE STUDY MOVIE NIGHT ANNUAL TRIPS HOLIDAY MEALS BAKE/GARAGE SALES CARD GAMES BOLTON AIR FIELD PICNIC HARMONY BALL	GLADDEN COMMUNITY HOUSE COINMACH LAUNDRY CMACAO CENTRAL OHIO AREA AGENCY ON AGING NORTH CENTRAL MENTAL HEALTH REC. & PARKS LIFECARE CMHA PRIVATE PROVIDER CMHA COUNCIL COUNCIL COUNCIL COUNCIL COUNCIL COUNCIL COUNCIL COUNCIL COUNCIL COUNCIL	RESIDENT FITNESS CTR. ON SITE REFERRAL SERVICES WEEKEND SOCIAL ACTIVITY EXPANDED HEALTH CARE BOOK MOBILE DRAMA DANCE CLASS ARTS & CRAFTS ACCESSIBLE TRANSPORT HEALTH FAIRS INCREASED SECURITY	YMCA ED/SS GRANT RESIDENT SERVICES ED/SS GRANT COLUMBUS LIBRARY REC. & PARKS REC. & PARKS REC. & PARKS ED/SS GRANT COLUMBUS HEALTH DEPT. PHDEP GRANT
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<u>TAYLOR TERRACE</u>	<p>CONGREGATE MEALS</p> <p>TRANSPORT</p> <p>WELLNESS NURSE</p> <p>BUILDING MONITOR</p> <p>ON SITE LAUNDRY</p> <p>SECURITY</p> <p>BINGO</p> <p>MOVIE NIGHT</p> <p>BIBLE STUDY</p> <p>WEEKLY RESIDENTS DINNER</p> <p>BOLTON FIELD PICNIC</p> <p>HARMONY BALL</p> <p>HOLIDAY MEALS & CELEBRATIONS</p>	<p>LIFECARE ALLIANCE</p> <p>CMACAO</p> <p>LIFECARE ALLIANCE</p> <p>CMHA</p> <p>COINMACH LAUNDRY</p> <p>CMHA</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p> <p>COUNCIL</p>	<p>FITNESS CTR.</p> <p>EXPANSION CARE CALLERS</p> <p>BOOK MOBILE</p> <p>COMPETITIVE GAMES</p>	<p>YMCA</p> <p>CMHA</p> <p>COLUMBUS LIBRARY</p> <p>COUNCIL RESIDENT SERVICES</p>
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<u>WORLEY TERRACE</u>	MENTAL HEALTH SERVICES	NORTH CENTRAL MENTAL HEALTH	FITNESS CTR.	YMCA
	WELLNESS NURSE	LIFECARE	ON SITE REFERRAL SERVICE	ED/SS GRANT
	BUILDING MONITOR	CMHA	EXPANSION CARE CALLERS	CMHA
	SECURITY	CMHA	MORE SOCIAL ACTIVITIES	COUNCIL/ RESIDENT SERVICES
	ON SITE LAUNDRY	COINMACH LAUNDRY	BOOK MOBILE	COLUMBUS LIBRARY
	BIBLE STUDY	COUNCIL	COMPETITIVE GAMES	COUNCIL RESIDENT SERVICES
	COFFEE SHOP	COUNCIL	EXPANDED HEALTH CARE	COLUMBUS HEALTH DEPT.
	ANNUAL TRIPS	COUNCIL	ACCESSIBLE TRANSPORT	ED/SS GRANT
	BAKE/GARAGE SALES	COUNCIL	24 HOUR SECURITY	PHDEP GRANT
	CRIME NIGHT OUT	COUNCIL		
	ICE CREAM SOCIAL	COUNCIL		
	HOLIDAY CELEBRATIONS	COUNCIL		
	ARTS & CRAFTS	COUNCIL		
	BOLTON FIELD PICNIC	COUNCIL		
	HARMONY BALL	COUNCIL		
	SANTA CALLS	COUNCIL		
	CARE CALLERS	NATIONWIDE INSURANCE		
		CMHA		

CONTINUOUS ACTIVITIES:

MONTHLY NEWSLETTERS CONTAINING HEALTH, EDUCATION, AND COMMUNITY OPPORTUNITIES AND ACTIVITIES.

**COLUMBUS
METROPOLITAN
HOUSING
AUTHORITY**

**SECTION 8
ADMINISTRATIVE PLAN**

**RENTAL CERTIFICATE
AND
HOUSING VOUCHER
PROGRAMS**

Adopted by the CMHA Board of Commissioners on November 19, 1999

**COLUMBUS METROPOLITAN HOUSING AUTHORITY
SECTION 8 ADMINISTRATIVE PLAN
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I. STATEMENT OF LOCAL POLICIES AND OBJECTIVES

The Section 8 Program was created by the Housing and Community Development Act of 1974 and further amended by federal legislation. Administration of the Housing Programs and the functions and responsibilities of the PHA staff will be in compliance with the Personnel Policy of the PHA, the Equal Opportunity Plan, and by this Administrative Plan. All Federal, State, and local housing laws will be followed.

A. PURPOSE OF THE PLAN

The overall plan for the Section 8 Existing Program is designed to achieve four major objectives:

1. To provide improved living conditions for low-income families while maintaining their rent payments at an affordable level;
2. To promote freedom of housing choice and spatial de- concentration of lower income and minority families;
3. To provide decently housing for eligible participants;
4. To provide an incentive to private property owners to rent to low income families by offering timely assistance payments and protection against unpaid rent.

The purpose of this Administrative Plan is to establish local policies for the administration of the Section 8 Existing Certificate and Housing Voucher Programs in accordance with HUD requirements.

The Plan covers both admission and continued participation in these programs. Policies are the same for both programs, unless otherwise noted.

Changes to the Plan will be approved by the PHA's Board of Commissioners.

The PHA is responsible for complying with all subsequent changes in HUD regulations pertaining to these programs. If such changes conflict with this Plan, HUD regulations will have precedence.

B. LEGAL JURISDICTION

The legal jurisdiction for the operation of the Section 8 Program for the Columbus Metropolitan Housing Authority is Franklin County, Ohio.

C. PRIVACY RIGHTS AND RELEASE OF INFORMATION

The PHA recognizes that the right of privacy must be afforded to all Section 8 applicants and participants. Therefore, disclosure of any information maintained by the PHA will be restricted unless a blanket release of information is executed by the applicant or participant which releases the PHA from any claims. The PHA may share applicant and participant information with the appropriate federal agencies in the course of conducting official agency business.

In accordance with HUD regulations, the PHA will provide upon a prospective landlord's request, the family's current address and their current landlord's address and telephone number and the family's previous address and their previous landlord's address and telephone number from PHA records if they are available. The PHA will not be held responsible for any inaccurate information obtained from the family's file. No further information about the family will be provided unless the family gives the prospective landlord their written consent to review the information collected by the PHA. The PHA also reserves the right to verify that the person(s) requesting the information is an actual prospective landlord and may request the landlord to release the PHA from any claims. The PHA may assess a fee for all records photocopied and/or the time spent to obtain the information from the PHA's computerized data system.

Information concerning the PHA's participating Section 8 landlords may be obtained upon written request. The PHA may assess a fee for all records photocopied and/or the time spent to obtain the information from the PHA's computerized data system.

All other requests for the release of information about the Section 8 Program and the PHA's administrative records and documents will be subject to approval by the PHA pursuant to federal and State law.

D. DESCRIPTION OF PROGRAMS OFFERED

The PHA operates the following programs:

1. Public Housing (The PHA owns and operates the housing under this program);
2. Section 8 Rental Certificate Program;
3. Housing Voucher Program;
4. Section 8 Moderate Rehabilitation Program;
5. Shelter Plus Care Program.

II. EQUAL OPPORTUNITY HOUSING PLAN

A. PURPOSE

The Columbus Metropolitan Housing Authority Equal Opportunity Housing Plan fulfills the requirements outlined in 24 CFR § 982.53 of the HUD regulations governing the Existing Certificate, Housing Voucher, Moderate Rehabilitation, and Shelter Plus Care Programs.

B. SEVERABILITY

Any part of the Equal Opportunity Housing Plan found to be in conflict with the statutes or regulations governing these programs shall be void and does not affect the remaining operable parts of this Plan.

OBJECTIVE I - OUTREACH TO LOWER INCOME FAMILIES

A. POLICY

It is the PHA's policy to provide the widest possible dissemination of information to low-income families regarding the availability of Section 8 Housing Assistance in order to maximize safe affordable housing opportunities for eligible families who reside in Franklin County.

B. METHOD

The PHA's Section 8 Program is widely known in the Columbus area. The PHA uses local and general circulation newspapers to announce when the PHA is accepting applications for Section 8 Assistance. The PHA places advertisements in these newspapers which will at a minimum contain the following information:

1. Description of the Section 8 Program;
2. Definition of Eligibility;
3. Time and location of applications to be accepted and the deadline for making an application;
4. Telephone number and contact person for further information about the Program.

The PHA will also make notices available to local social service agencies, local radio and television stations and other agencies who provide services to low-income families in Franklin County.

The PHA also responds to telephone calls from interested families who are seeking information about the Program.

OBJECTIVE II - PROMOTING GREATER HOUSING OPPORTUNITIES FOR FAMILIES OUTSIDE AREAS OF LOW-INCOME AND MINORITY CONCENTRATION POLICY

It is the policy of the PHA to make Section 8 Program information available to all owners and managers of decent and affordable housing in Franklin County and to encourage current participating Section 8 owners and managers to continue to provide quality housing to the PHA's Section 8 families.

A. POLICY IMPLEMENTATION

The PHA conducts a comprehensive marketing program to broaden housing opportunities for low-income families who are assisted by the PHA's Section 8 Program. Efforts to educate owners and promote the PHA's Section 8 Program involves the following:

1. a quarterly Section 8 landlord newsletter;
2. working meetings and seminars with landlords to explain Section 8 regulations and PHA policies;
3. the development of Program marketing publications;
4. customer service training for the PHA's Section 8 staff;
5. active recruitment of units by the staff.

Use of exception rent schedules for up to 120% of the Fair Market Rents for non-central city geographic areas and use of Over FMR tenancies for other areas.

To aid Program participants, the PHA has developed a list of available vacant units by location, bedrooms, and housing type (duplex, single family, etc.). This list is updated monthly as owners inform the PHA that their units are available for Section 8 families. This list is made available to Section 8 participants upon request.

Nothing in this Section shall be construed to violate the "finders- keepers" policy and the non-steering provisions of the tenant-based Section 8 Program.

OBJECTIVE III - ENSURING EQUAL OPPORTUNITY TO APPLICANTS FOR PARTICIPATION IN THE PHA'S RENTAL CERTIFICATE, HOUSING VOUCHER, AND MODERATE REHABILITATION PROGRAMS POLICY

The PHA shall select families for participation without regard to an applicant's age, race, color, gender, familial status, creed, religion, disability, or national origin.

A. ADMINISTRATIVE PROCEDURES

The PHA's selection process is outlined in Sections IV, V, VI, and VII of this Plan and conforms to current HUD regulations. The PHA ranks the applications by local preferences and by application date without regard to the applicant's bedroom size. Preference priorities may be revised in accordance with changing federal regulations. The PHA takes applicants from the waiting list whenever Section 8 funds are available to enter into additional housing assistance contracts.

When a family applies for the Section 8 Program, the family is also listed on the Moderate Rehabilitation Program waiting list. Families who are near the top of the Moderate Rehabilitation waiting list are notified and referred to Moderate Rehabilitation owners who have vacant units. If the owner cannot approve a suitable family referred by the PHA, the owner is permitted to find a family of his/her choice and refer the family to the PHA to lease the vacant unit. The owner's referred family must meet HUD and PHA income and family composition eligibility regulations. The PHA advises Moderate Rehabilitation owners of their obligation to assist families referred from the PHA's waiting list before renting to non-waiting list families. The PHA monitors owners' good faith efforts to rent to a waiting list family before renting to a non-waiting list family.

The Section 8 waiting list is constantly updated by the PHA. Updating is accomplished by mailing "still interested" cards to applicants and by notifying applicants to update and verify information furnished to the PHA. Applicants who fail to return "still interested" cards to the PHA or refuse or fail to provide updated information are removed from the Section 8 waiting lists.

OBJECTIVE IV - SERVICES AND ASSISTANCE TO FAMILIES WHO HAVE ALLEGED THEY HAVE ENCOUNTERED DISCRIMINATION DURING THEIR HOUSING SEARCH

A. POLICIES AND PROCEDURES

Information on fair housing laws is provided to all Section 8 participants at group or one-on-one briefings. The HUD-903 Form is given to all families at their briefing with instructions to contact the PHA in the event that the family has reason to believe that they have been illegally denied housing. The PHA will assist families in completing the form and refer families to the Columbus HUD Office for further investigation.

Families will also be referred to the Columbus Urban League and/or the Legal Aid Society of Columbus. Both agencies investigate fair housing complaints.

The PHA will also make available to families alleging discrimination a list of vacant units whose owners are willing to rent to Certificate or Voucher holders. Moderate Rehabilitation families will be referred to other Moderate Rehabilitation owners if other vacant units are available.

OBJECTIVE V - UTILIZATION OF LOCAL FAIR HOUSING AGENCIES

As stated above, the PHA will refer any family who has a fair housing complaint to the Columbus Urban League, the Legal Aid Society of Columbus, or such other agencies designated by HUD. The PHA will cooperate with these agencies in their investigation of the family's complaint.

Advice and assistance will be offered to disabled families as necessary in accordance with federal, State, and local law. The PHA will offer reasonable accommodation in the administration of the Section 8 policies and in giving assistance to disabled families to finding affordable and decent housing and complying with HUD and PHA regulations and policies.

OBJECTIVE VI - EQUAL OPPORTUNITY IN THE PHA'S EMPLOYMENT PRACTICES

The PHA is an equal opportunity employer who has established policies and practices which assure equal opportunity to all employees and applicants without regard to race, color, creed, religion, gender, disability, or national origin.

OBJECTIVE VII - EQUAL OPPORTUNITY FOR PERSONS WITH DISABILITIES

Qualified persons with disabilities solely by reason of their disabilities must not be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Section 504 requires Section 8 agencies to affirmatively ensure that persons with disabilities are given an equal opportunity to participate in the Section 8 Program. HUD's Section 504 regulations, which are contained in 24CFR 8(Subpart A-E) provide a more detailed explanation of Section 8 responsibilities.

A qualified person with a disability:

- Must be afforded an opportunity equal to that afforded others, and/or;
- Must be provided housing or benefits as effective as those afforded to others, and/or;
- May not be provided different or separate housing or benefits unless necessary to provide with a person with a disability with housing or benefits that are as effective as those provided to others.

The PHA will afford persons with disabilities an equal opportunity to gain the same benefit, or to reach the same level of achievement as those who do not have disabilities.

The PHA is obligated to administer the tenant-based assistance program in the most integrated setting possible that is appropriate to the needs of qualified persons rather than to separate the person from the general population.

In any case, a person with a disability must ask for an accommodation of their disability before the PHA treats them differently.

III. ELIGIBILITY FOR ADMISSION

To be eligible for admission, an applicant must meet HUD's criteria for eligibility and any additional criteria established by the PHA in compliance with federal regulations.

HUD has established the following factors to determine eligibility:

1. Family Composition;
2. Income Limits;
3. Provision of Social Security Numbers;
4. Other Criteria for Admission which Relates to Prior History on the PHA's housing programs.

The Family's initial eligibility for placement on the waiting list will be made in accordance with the following factors:

A. FAMILY COMPOSITION

The applicant must qualify as a Family. A Family may be:

1. A single person or group of single persons:
 - A. A single person may be one of the following:
 - An elderly person (see definition below);
 - A disabled person (see definition below);
 - A displaced person (see definition below);
 - Any other single person.
2. A single person, a married couple, or two persons who will live regularly together in the same dwelling unit with a child or children.
3. A group of persons consisting of two or more elderly or disabled persons living together or one or more elderly or disabled persons living with one or more live-in aides.
4. An elderly and/or disabled household whose head or spouse meets the following definition where the household head or spouse must be:
 - 62 years of age; or

- Handicapped with a physical impairment which is expected to be of long continued and indefinite duration, but does not prohibit independent living and is of such nature that the ability could be improved by more suitable housing conditions; or
 - Disabled pursuant to Section 223 of the Social Security Act or Section 102 of the Developmentally Disabled Act.
5. An expectant mother unless she aborts prior to admission. If she aborts prior to admission, she will be classified as a single person.
 6. A remaining member of a family assisted by the PHA's Section 8 Program.
 7. A person displaced by governmental action, or a person whose dwelling has been extensively destroyed as a result of a disaster declared or otherwise formally recognized under federal disaster relief laws.

Head of Household:

The head of household is the person who assumes legal responsibility for the household and is listed on the application.

A family may not designate an elderly family member as head of household solely to qualify the family as an Elderly Household. There can be a co-head if the adult members are not married and both claim to assume joint legal responsibility for the household and are listed on the application as co-head.

Live-In Attendants:

A Family may include a live-in attendant who:

1. Has been determined by the PHA to be essential to the care and well being of the elderly, handicapped or disabled family member;
2. Is not obligated for the support of the elderly, handicapped or disabled member;
3. Would not be living in the unit except to provide care of the elderly, handicapped or disabled family member;
4. Whose income will not be counted for purposes of determining eligibility or rent.

Relatives are not automatically excluded from being care attendants, but must meet the definition described above.

A live-in attendant with a child is not qualified as a live-in attendant, since the child is not needed to attend the elderly, handicapped or disabled individual, unless the child meets the family definition.

Live-in attendants cannot be the remaining member of the tenant's family if the person they are attending is no longer a participant on the Section 8 Existing Housing Program.

To determine whether a live-in attendant is "essential to the care and well being of the elderly, handicapped or disabled person," the PHA will send a third party verification request to a reliable medical source familiar with the applicant. The letter will request exact information on the services the live-in attendant needs to justify why the live-in attendant is medically necessary.

B. INCOME LIMITATIONS

The annual income of applicants shall not exceed income limits as established by HUD.

A family is eligible if their annual income does not exceed the income limits as established by HUD or if the family:

1. Is "continuously assisted" under the 1937 Housing Act. CFR part 511;
2. Is a low-income non-purchasing family residing in a HOPE 1 or HOPE 2 project;
3. Is a low-income non-purchasing family residing in a project subject to home ownership;
4. Is a low-income family displaced as a result of the prepayment of a mortgage or voluntary termination of a mortgage insurance contract under 24 CFR 165;
5. (For certificate program only) Is residing in a HUD-owned multi-family rental housing project when HUD sells, forecloses, or demolishes the project.

"Continuously assisted" means that the family is already receiving assistance under any 1937 Housing Act Program when the family is admitted to the certificate or voucher program. There may be a brief interruption of assistance under these programs and the admission to the certificate or voucher program. To be eligible under the category of "continuously assisted," the interruption of assistance cannot be greater than 90 days and the circumstances for the termination of housing assistance under the 1937 Housing Act must have been beyond the control of the family.

The applicable income limit for admission is the income limit for the area in which the family initially leases a unit and first becomes a Section 8 participant.

C. MANDATORY SOCIAL SECURITY NUMBERS

Families are required to provide Social Security Numbers for all family members age six and older prior to admission if they have been issued a number by the Social Security Administration.

All members of the family must:

1. provide their Social Security Number; or
2. Provide written certification that they have not been assigned a Social Security Number. If the individual is under 18, the certification must be executed by his or her parent or guardian. If the participant who has signed a certification form obtains a Social Security Number, it must be disclosed at the next regularly scheduled income reexamination.

If an applicant or tenant cannot provide his or her Social Security card, other documents listed below showing his or her Social Security Number may be used for verification. He or she may be required by the PHA to provide one or more of the following alternative documents:

1. Identification card issued by a federal, state or local agency;
2. Identification card issued by an employer or trade union;
3. Identification card issued by a medical insurance company;
4. Earnings statements or payroll stubs;
5. Bank statements;
6. IRS Form 1099;
7. Benefit Award letters from government agencies;
8. Unemployment benefit letter;
9. Retirement benefit letter;
10. Life insurance policies;
11. Court records such as real estate, tax notices, marriage, divorce, judgement, or bankruptcy records.

If the PHA verifies Social Security benefits with the Social Security Administration, the acceptance of the Social Security Number by the Social Security Administration will be considered documentation of its validity.

Applicants may not become participants until the Social Security Number documentation is provided. The applicant will retain their position on the waiting list for a period of not greater than 60 days.

New family members over 5 years of age will be required to verify (or certify, as applicable) their Social Security information when the change in family composition is reported by the family, whether that be at an annual or interim reexamination.

D. OTHER CRITERIA FOR ADMISSION

Other criteria must be met for an applicant to be eligible for assistance under the PHA Section 8 Program:

- The family must have paid any outstanding debt owed the PHA or another PHA on any previous tenancy for Public Housing or Section 8 Existing. No Repayment Agreement will be accepted. The family must repay in full in order to be considered eligible for admission.
- The family must have left any previous tenancy under the Section 8 Program without being in violation of a family obligation under its Certificate of Family Participation or Housing Voucher.
- The family must not have engaged in drug-related criminal activity or violent criminal activity, including criminal activity by any Family member.

Drug-related criminal activity means:

- The illegal manufacture, sale or distribution, or the possession with intent to manufacture, sell or distribute, a controlled substance (as defined in the Controlled Substance Act);
- The illegal use or possession (other than with intent to manufacture, sell or distribute), of a controlled substance, except that such use or possession must have occurred within one year before the date that the PHA provides notice to an applicant or participant of the PHA's determination to deny admission or terminate assistance;
- Drug related criminal activity does not include the use or possession if the family member can demonstrate that s/he:
 - a. Has an addiction to a controlled substance, has a record of such impairment, or is regarded as having such an impairment;
 - b. Is recovering or has recovered from such addiction and does not currently use or possess controlled substances.

Violent criminal activity includes any illegal criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force against the person or property of another.

Evidence of criminal activity is based upon the PHA's assessment of the preponderance of evidence obtained from law enforcement agencies regardless of whether the family member has been arrested or convicted.

The PHA will not be obligated to ferret out information concerning a family's criminal activities as part of the processing of an application for assistance. Initial screening will be limited to routine inquiries of the family and any other information provided to the PHA regarding this matter. The inquiries will be standardized and directed to all applicants by the inclusion of the inquiry on the application form.

Families who have been evicted from Public Housing or by Section 8 owners for engaging in these activities will be denied admission.

E. SUITABILITY OF TENANT

The PHA does not screen for factors such as credit rating or landlord references which relate to the suitability of the applicant family as tenants. Screening the family is the sole responsibility of the landlord. However, the PHA may deny admission to a family on the basis of criminal activity, illegal drug use or drug trafficking.

- **CHANGES WHICH OCCUR BETWEEN FINAL ELIGIBILITY DETERMINATION AND EFFECTIVE LEASE DATE**

Changes which occur during this period will not affect eligibility to lease the unit. For example, if a single person is pregnant and aborts during this period, if the family goes over the income limits, or if a single person loses his/her disability status which was necessary to establish eligibility, s/he will continue to be eligible for the program and may continue with lease-up.

IV. APPLYING FOR ADMISSION

A. HOW TO APPLY

The PHA elects to maintain a separate waiting list for the Section 8 Program applicants will be wait listed and may be offered a Section 8 Certificate, Housing Voucher or Moderate Rehabilitation unit depending upon the type of Section 8 assistance available.

Families wishing to apply for any of the PHA's programs must complete an application when application-taking is open.

If the waiting list is closed and the PHA decides to open the waiting list, the PHA will publish the application date(s), in local general circulation newspapers. The PHA's advertisement will state criteria to define and limit what families may apply for assistance during this period of application taking. The publication will also specify the location where applications are taken.

Applications are taken to compile a waiting list. Due to the demand for housing in the PHA's jurisdiction, the PHA does not generally take applications on an "open enrollment" basis but may elect to do so.

The application process will be undertaken in two phases: 1) a preliminary application will be taken first and eligibility will be determined. 2) When the family comes to the top of the waiting list and the PHA will be ready to issue a Certificate or Voucher within 60 days, the PHA will take a full application and verify the information provided by the family.

Acceptance of Applications:

When application taking is open, applications are dated when they are received by the PHA.

Preliminary applications do not require an interview, but full applications do.

Any family requesting a preliminary application for Section 8 rental assistance will be given the opportunity to apply as long as the waiting list is open and the PHA is accepting applications.

B. OPENING/CLOSING OF APPLICATION TAKING

B. OPENING/CLOSING OF APPLICATION TAKING

Applications will be accepted only during the advertised periods of enrollment. These enrollment periods are determined based upon the need of the PHA to augment its waiting list and to comply with local admission preferences.

The PHA may suspend the taking of applications during the enrollment period by public notice if the waiting list is such that additional applicants would not be able to receive a Certificate of Family Participation or Voucher within 12 months.

Reopening of the Wait List:

The following procedures will apply to all public notices concerning periods of enrollment:

- publishing the notice in the local newspaper;
- posting the notice in the Applications Office;
- publishing the notice in local minority media publications.

Wait-Listing of Applicants:

The PHA elects to maintain and process applications from a separate wait list for Section 8 applications. In the event the family wishes to make an application to live in a Public Housing community, the family will be advised to complete a separate Public Housing application.

C. PRELIMINARY APPLICATION PROCEDURES

The PHA will utilize a basic preliminary application form. The information is to be filled out by the client whenever possible.

The purpose of the preliminary application is to assess family eligibility for placement on the waiting list.

The preliminary application requests the following information and must be completed in its entirety:

- names and ages of all household members;
- gender and relationship of members;

- address and telephone number;
- amount and source of all income and assets;
- information to confirm any disabilities of family members;
- information related to selection preferences.

The preliminary application for the Section 8 Certificate Program is also utilized for the Voucher Program.

When the application is completed, the PHA staff will assess the applicant's eligibility as a Section 8 participant. If eligible the applicant will be placed on the appropriate waiting list(s) in accordance with the PHA's preference policies.

If the applicant is ineligible, the PHA will provide written notification.

While on the wait list, applicants are responsible for reporting to the PHA changes in family circumstances (including income, address, and family composition changes) in writing and are responsible for responding to requests from the PHA to update preliminary applications. Refusal or failure to provide information may result in the applicant being removed from the waiting list.

D. NOTIFICATION OF FAMILY STATUS ON THE WAITING LIST

After being placed on the waiting list, the applicant will be informed by mail of the probable date their name will be reached to receive a Certificate or Voucher. The PHA communication will in no way lead applicants to believe that the estimated date of Certificate or Voucher issuance is exact, but will stress that the estimated date of Certificate or Voucher issuance is subject to several factors that are beyond the PHA's control (i.e. preference determination, turnover, funding, etc.)

E. COMPLETION OF THE FULL APPLICATION PROCESS

Applicants on the waiting list will be requested to complete the full application process when the PHA estimates that a Certificate or Voucher can be issued within 60 days. The full application process consists of an interview and the applicant completing the PHA's Personal Declaration Form.

The family will complete the full application process on their own by using the Personal Declaration Form as the basis for the full application.

Families will be scheduled for an interview as part of the PHA's procedures for processing a full application.

1. Requirement to Attend Scheduled Meeting.

It is the applicant's responsibility to reschedule the interview prior to the scheduled interview date if they cannot attend the appointment. The applicant must contact the PHA to reschedule the appointment by no later than 4:30 p.m. on the day of the appointment. The PHA will allow only one rescheduling of the application appointment. If the applicant does not reschedule and misses the scheduled meeting, the PHA has the right to reject the application. Applicants will be notified in writing if the application is rejected for this reason.

Rejection of the application means that the household will be removed from the waiting list and must reapply when applications are being taken.

The household head or spouse is required to attend the interview and sign the housing application. All adult members must sign the application and sign the required forms.

2. Verification of Full Application Information.

Information provided by the applicant will be verified including information on family composition, income, assets, allowances and deductions, preference status, full time student status, and other factors relating to eligibility determination before the applicant is issued a Certificate or Voucher.

Third party verifications in writing (sent by mail) are preferred. Oral third party verifications are acceptable if documented.

If third party written verification is impossible or the third party does not respond within a four-week period, the PHA will use documents provided by applicants. Documents will be photocopied when not prohibited by law. When documents cannot be photocopied, staff certification forms will be used to record the source of information and will be signed and dated by the staff person who viewed the document.

If the PHA determines at the interview that more information or verification is needed, the applicant will be given or sent a need-more letter, requesting the applicant to provide the information within 10 days from the date of the letter. If there is no response after 10 days, a second need-more letter will be sent with an additional 10 day response period.

If there is no response to the second need-more letter, within 10 days, an ineligibility letter will be sent to the applicant.

Acceptable verification of preferences is listed under the preference section of this Plan. Preferences will be verified prior to completing the full application process, and may be done prior to calling the applicant in for an interview. If preference status has changed the applicant will be notified of their new status on the wait list(s).

F. FINAL DETERMINATION AND NOTIFICATION OF ELIGIBILITY

Because HUD can make changes in rules and regulations, it is necessary to make a final eligibility determination. Also, family circumstances may have changed between preliminary application and final eligibility determination.

After the verification process is completed, the PHA makes its final determination of eligibility, based on the same factors as preliminary eligibility, but using verified data.

The household is not eligible for Certificate or Voucher issuance until this final determination has been made, even though their application has been preliminarily determined eligible and placed on the wait list(s).

G. GROUNDS FOR DENIAL OF ADMISSION

In accordance with the regulations, the PHA is not required to assist families for any of the following grounds:

1. If the family violates any tenant obligations under the Program;
2. If any member of the family has ever been evicted from public housing;
3. If a PHA has ever terminated assistance under the certificate or voucher program for any member of the family;
4. If any member of the family commits drug-related criminal activity or violent criminal activity;
5. If any member of the family commits fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program;
6. If the family owes rent or other amounts to the PHA or to another housing authority in connection with Section 8 or public housing assistance under the 1937 act;
7. If the family has not reimbursed any housing authority for amounts paid to an owner under a HAP contract for rent damages to the unit, or other amounts owed by the family under the lease;

8. If the family breaches an agreement with a housing authority to pay amounts owed to a housing authority;
9. If a family participating in the Family Self Sufficiency Program fails to comply, without good cause, with the family's FSS contract of participation;
10. If the family has engaged in or threatened abusive or violent behavior toward a housing authority's personnel.

Former Section 8 participants or Public Housing residents are eligible to reapply for the Section 8 program under the following conditions:

- Previous Section 8 participants who have been terminated may reapply if they have not been terminated for fraud or for any other corrupt act in connection with any federal housing assistance program. A three-year period of ineligibility must be completed before the family is permitted to reapply. The ineligibility period starts at the termination date of the previous housing assistance;
- All amounts owed the PHA must have been paid in full;
- All former adult residents evicted from the PHA's public housing program must also complete a three-year period of ineligibility. The ineligibility period starts at the court approved eviction date. However, if the reason for eviction was tenant fraud, the family is permanently barred from participating in the Section 8 Program.

H. RIGHT TO INFORMAL REVIEW

Applicants who are denied Section 8 assistance are entitled to an informal review of their application. People are considered "applicants" until there is an effective lease and subsidy contract, at which time they become "participants."

Ineligible applicants will be promptly provided with a letter detailing their individual status, stating the reason for their ineligibility, and offering them an opportunity for an informal review.

An informal review may be requested for the following decisions denying:

- listing on the PHA's wait list;
- issuance of a certificate or voucher;
- participation in the program.

Applicants must submit their request in writing to the PHA within 10 days from the date of the notification.

Informal reviews shall be conducted in accordance with the PHA's Manual of Policies and Procedures Governing Tenant Grievances.

I. FULL APPLICATION (INITIAL)

The PHA will send written notice to the applicant that an appointment has been scheduled to begin the full application process. If the applicant does not show for this appointment, a second appointment will be scheduled within 10 to 14 days. The PHA will send written notice to the applicant of the second appointment. If the applicant fails to show for the second appointment, the PHA will initiate procedures to remove the applicant from the wait list.

If the applicant notifies the PHA that they are unable to keep either the first or second appointment, a third appointment may be scheduled at the discretion of the Application Supervisor, if s/he determines that the applicant had a valid excuse(s) for missing the appointments.

No more than three appointments may be scheduled for the purpose of starting the full application process.

J. NEED-MORE APPOINTMENT AND/OR DOCUMENTS

At the applicant's initial appointment, the PHA may require the applicant to provide additional documents or certifications in order to complete the full application process. The PHA will schedule a "need-more" appointment with the applicant to enable the applicant to give the requested items directly to the application caseworker. This procedure enables the caseworker to complete the application interview and certification process. The caseworker may also request that the applicant return or mail the additional needed items to the PHA's offices in order to conclude the full application process. A deadline for receiving required documents will be given to the applicant in writing and noted in the applicant's file.

The PHA will give an applicant no more than two opportunities to provide the required additional information in order to complete the full application process. The applicant's refusal or inability to provide the requested information shall be grounds for the removal from the wait list.

V. ESTABLISHING PREFERENCES AND MAINTAINING THE WAITING LIST

A. PRELIMINARY APPLICATION POOL

An application pool will be maintained in accordance with the following factors:

1. The preliminary application will be a permanent file filed numerically by client number.
2. The pool will be maintained on the computer in order of preference. Applications equal in preference will be maintained by date and time of their preliminary application date. All applications will be grouped by the number and type of local preferences claimed and be ranked by group and position within each group.
3. All applications must meet income eligibility requirements as established by HUD or by the PHA in conformance with HUD regulations.

The waiting list will be continuously updated.

The following types of families will not be considered part of the waiting list:

- a. Portability families from another jurisdiction who are considered eligible under the Certificate or Voucher portability provisions;
- b. Families “targeted” by HUD or the PHA to receive a special type of Certificate or Voucher:
 - a. families displaced because of demolition or disposition of a public housing project;
 - b. families residing in a multi-family rental housing project when HUD sells, forecloses, or demolishes the project;
 - c. for families covered by the Low Income Housing Preservation and Resident Homeowner Act of 1990;
 - d. a non-purchasing family residing in a project subject to a home ownership program under 24 CFR 248.173;
 - e. a family displaced because of mortgage prepayment or voluntary termination of mortgage insurance contract (24 CFR 248.165);
 - f. a family residing in a project covered by a project-based Section 8 HAP contract at or near the end of the HAP contract term;
 - g. a non-purchasing family residing in a HOPE I or HOPE 2 project;
 - h. families participating the Family Unification Program;

- i. families participating in the Mainstream for Persons with Disabilities Program;
- j. Shelter Plus Care participants or other similar supportive housing programs for disabled or homeless families.

The PHA will retain a hard copy of records of the Section 8 wait lists for one fiscal year (January 1 to December 31) in order to provide an audit trail for inspection by Independent Public Audit (IPA) and HUD. When HUD approves the IPA audits, the PHA will release the wait lists for destruction.

B. WAIT LIST PREFERENCES

The PHA chooses to target all its Section 8 Certificates and Housing Vouchers (except for special set asides, e.g., Shelter Plus Care) to applicants earning 30 percent or less of the Franklin County median income, adjusted for family size, as the primary way of meeting its obligation to serve the community's "poorest of the poor." Higher income groups would not be served unless all applicants with the lower income preference have been assisted.

In the event that future HUD regulations permit, the PHA may enter into separate agreements with community service providers or other appropriate agencies to provide housing assistance to severely disadvantaged client populations which may be homeless, disabled, victims of domestic violence, or other disadvantaged populations. Such agreements may not exceed 20 percent of the available Certificates or Housing Vouchers at any time.

C. ORDER OF SELECTION

Applications will be ranked in the following order:

- a. Applicants earning 30 percent or less of the median income as adjusted for family size, not currently receiving subsidized housing assistance, and **with** a veteran's preference;
- b. Applicants earning 30 percent or less of the median income as adjusted for family size, not currently receiving subsidized housing assistance, and **without** a veteran's preference;
- c. Applicants earning 31 percent or more of the median income as adjusted for family size, not currently receiving subsidized housing assistance, and **with** a veteran's preference;

- d. Applicants earning 31 percent or more of the median income as adjusted for family size, not currently receiving subsidized housing assistance, and **without** a veteran's preference;
- e. Applicants earning 30 percent or less of the median income as adjusted for family size, currently receiving subsidized housing assistance, and **with** a veteran's preference;
- f. Applicants earning 30 percent or less of the median income as adjusted for family size, currently receiving subsidized housing assistance, and **without** a veteran's preference;
- g. Applicants earning 31 percent or more of the median income as adjusted for family size, currently receiving subsidized housing assistance, and **with** a veteran's preference;
- h. Applicants earning 31 percent or more of the median income as adjusted for family size, currently receiving subsidized housing assistance, and **without** a veteran's preference;
- i. Applicants who are single and not disabled, displaced, or elderly earning 30 percent or less of median income as adjusted for family size, not currently receiving subsidized housing assistance, and **with** a veteran's preference;
- j. Applicants who are single and not disabled, displaced, or elderly earning 30 percent or less of median income as adjusted for family size, not currently receiving subsidized housing assistance, and **without** a veteran's preference;
- k. Applicants who are single and not disabled, displaced, or elderly earning 31 percent or more of median income as adjusted for family size, currently receiving subsidized housing assistance, and **with** a veteran's preference;
- l. Applicants who are single and not disabled, displaced, or elderly earning 31 percent or more of median income as adjusted for family size, currently receiving subsidized housing assistance, and **without** a veteran's preference.

The PHA will rank each of the above groups by the date and time of the application. The PHA does not elect to give a higher ranking to or aggregate any of the above preferences. Interviews for completion of a full application are scheduled on this preference system.

1. Local Preference.

The PHA has adopted a veteran's preference pursuant to Ohio Revised Code.

2. Initial Determination.

If the preference verification indicates that the applicant is not entitled to the preference, the applicant will be replaced in order on the waiting list without the preference or denied a place on the waiting list. The decision to deny the applicant a place on the waiting list will be dependent upon the criteria for accepting eligible applications.

D. MAINTAINING THE WAITING LIST

After the preliminary eligibility determination has been made, applicants are placed on the waiting list in order of application date and preference. The PHA will maintain an accurate waiting list which conforms to HUD requirements.

The waiting list will provide the following information on apparently eligible households who have an active pre-application:

- m. Name of head of household;
- n. Date and time the pre-application was received;
- o. Unit size required;
- p. Preference status codes;
- q. Minority status (when required by the Field Office);
- r. Eligibility date;
- s. Client number;
- t. Location Code

E. UPDATING THE WAITING LIST

The PHA will periodically update the waiting list to ensure that it is current and accurate. In order to update the waiting list, the PHA will mail an "Are You Still Interested" Letter to the applicant's last known address, requesting information regarding their continued interest in maintaining a place on the waiting list.

Any mailings to the applicant which require a response will give a reasonable deadline for the applicant's written response. If the applicant does not respond by the deadline, the applicant will be removed from the waiting list.

If the applicant did not notify the PHA of a move as required, the PHA will not be responsible for the applicant's failure to receive the update request. Letters returned by the Post Office will result in the applicant being removed from the wait list.

If an applicant is removed from the waiting list for failure to respond, they will not be entitled to a reinstatement unless the Section 8 Programs Director determines there were circumstances beyond the applicant's control.

F. FINALIZING THE DETERMINATION

All completed and verified full applications are added to an "eligible to be notified" list and families are called in for briefing and issuance of certificates in accordance with this Administrative Plan.

G. OFFERS OF A CERTIFICATE OR VOUCHER

The PHA will send a letter to the applicant confirming the applicant's eligibility and inform the applicant that a briefing class will be scheduled for them to receive either form of assistance depending upon what type of assistance is available. When the applicant receives the PHA's notice to attend the briefing class, the applicant may request the alternate form of assistance.

The applicant must make a written request for the alternate form of assistance. The PHA will advise the applicant of the possibility of receiving the other type of assistance and if the other form becomes available, the applicant will be invited to attend the briefing class. If the applicant refuses both types of assistance, they will be declared ineligible and will be removed from the waiting list.

VI. SUBSIDY STANDARDS

A. CERTIFICATE/VOUCHER SIZE ISSUED

HUD regulations require that the PHA establish subsidy standards for the determination of bedroom sizes for the Certificate, Voucher, and Over Fair Market Rent Tenancies. These standards provide for a minimum commitment of subsidy while avoiding overcrowding. They also must meet the minimum requirements of the Housing Quality Standards.

The unit size assigned to a participant in the Section 8 Program serves as the basis for determining maximum rent that can be paid to an owner for the unit selected by the family.

The unit size on the Certificate, Voucher, or Over Fair Market Rent Tenancy remains the same as long as the family composition remains the same, regardless of the actual unit size selected.

The subsidy standards are based on the following criteria:

Bedroom Size	Minimum No. of Persons in Household
0-BR	1
1-BR	1
2-BR	2
3-BR	3
4-BR	4
5-BR	5
6-BR	6

Certificate, Voucher, and Over FMR Certificate subsidies are also subject to the following guidelines:

1. It will not be necessary for persons of different generations or opposite sex, except for spouses (or those living as spouses) to occupy the same bedroom.
2. Two children of the same sex may share a bedroom. The PHA may grant a larger bedroom size to accommodate different generations (ten years or greater).
3. A single head of household shall not be required to share a bedroom with his/her children.

4. A single individual with no other children who informs the PHA that she is pregnant at the time of her certificate/voucher issuance may be assigned a 2 bedroom certificate or housing voucher if either type of housing assistance is available at the time of initial issuance.

The family may request a larger bedroom size Certificate or Voucher by providing a written justification to the PHA. The family's request must be made within 10 days of the PHA's designation of the bedroom size on the family's certificate or voucher.

The PHA will consider the request according to the conditions outlined in this Plan and determine whether or not the request will be granted. The necessity for an exception to unit size standards must be verified and documented. The granting of the exception shall be at the sole discretion of the PHA.

Special circumstances may dictate a larger size than the Subsidy Standards permit:

Spouses who, because of verified medical reason, cannot share a bedroom and cannot locate a dwelling unit that has another room that can qualify as a sleeping area;

An elderly person or person with a disability who requires a live-in attendant.

The PHA will review the request and give the larger size if the PHA determines the request is reasonable.

B. UNIT SIZE SELECTED

The family may select a smaller or larger dwelling unit size than the bedroom size that is listed on the Certificate.

There are three criteria to consider for the Certificate Program:

1. **Fair Market Rent Limitation.** The PHA must always apply the Fair Market Rent for the Certificate size approved for the family or the unit size actually selected by the family, whichever is less.
2. **Utility Allowance.** The utility allowance used to calculate the gross rent is based on the actual size of the unit the family selects regardless of the size authorized on the family's Certificate.
3. **Housing Quality Standards.** HQS Standards allow 2 persons per living/sleeping room and would permit the following occupancy conditions, assuming that a living room qualifies as a living/sleeping area:

Bedroom Size	Maximum No. of Persons in Household
0-BR	1
1-BR	4
2-BR	6
3-BR	8
4-BR	10
5-BR	12
6-BR	14

For the Voucher Program or the Over Fair Market Rent Tenancy, a family is not restricted by the bedroom size of the unit they select for housing other than the unit meeting minimum Housing Quality Standards for space. However, if a Voucher or Over Fair Market Rent Tenancy family selects a unit smaller than their subsidy standard size, the PHA's Payment Standard or Fair Market Rent will be adjusted to the same bedroom size as the unit.

The utility allowance used for Voucher and Over FMR tenancies is the actual bedroom size and type of the unit selected, regardless of the subsidy size.

C. DOCUMENTATION

Any reason for the deviation from the above policies will be recorded in the tenant file.

VII. FAMILY INCOME AND DETERMINATION OF TOTAL TENANT PAYMENT

A. DEFINITION OF TEMPORARILY ABSENT

Families must notify the PHA in writing of any absence of any household member from the unit of more than 30 consecutive days. The family must supply any PHA requested information or certification on the purpose of family absences. The family's failure or refusal to cooperate shall be grounds for termination.

If the family leaves the unit for more than 3 consecutive months, or for more than 90 days in a calendar year, except for medical circumstances described in VII (A(4)), the unit will not be considered to be their only place of residence and they will be terminated from the program.

Common family situations require the PHA to provide the following policies:

1. If there is a one parent home and the children are removed from the parent, but after counseling the children will be returned, the PHA will contact Social Services to determine how long it will be before the children will be returned. The situation will be reevaluated after 90 days;
2. The parent will retain his/her eligibility as a remaining member of the tenant family. S/he must be issued a reduced size Certificate or Voucher, if the children are projected to be out of the home for more than six months from the initial removal date;
3. To determine whether and when the bedroom size should be changed, the PHA will use an approximate time of three months as a guide, depending on the individual circumstances and verification provided;
4. If the single parent temporarily leaves the household and if another adult is awarded temporary custody of the children while the parent is away, as long as the family continues to meet the definition of family, the family is not terminated. The single parent must not be absent from the unit for more than three (3) consecutive months or not more than 90 days in a calendar year.

1. Spouse.

If the spouse leaves the household and will be gone for 3 months or more in the recertification period and the family declares them permanently absent, they will be determined permanently absent and removed from the lease.

If the husband or wife leaves the household and the period of time is estimated to be less than 3 months, the family member may be determined to be temporarily absent unless the husband or wife institutes and/or obtains a divorce or legal separation. In that case the person who leaves the household will be considered permanently absent. Proof of instituting or obtaining a divorce or legal separation will be required when claimed by the family.

If the family member with children gives notice to the PHA before vacating the unit, the PHA will make a determination as to who will retain the Certificate or Voucher.

2. Adult Child.

If an adult child enters the military service and leaves the household, they will be determined permanently absent.

A student (other than husband or wife) who attends school away from home but lives with the family during school recesses may be considered permanently absent (income not counted, not on lease, not counted for Certificate/Voucher size) or temporarily absent (income counted, on lease, counted for Certificate/Voucher size) at the family's option.

3. Joint Custody of Children.

Children who are subject to a joint custody agreement but live in the unit at least 50% of the time will be considered members of the household. "50% of the time" is defined as 183 days of the year, which do not have to run consecutively.

4. Sole Member of Household.

General Leaves of Absence:

If the sole member of the household must leave the household for more than 3 consecutive months, or for more than 90 days in a calendar year, the unit will not be considered to be their only place of residence and they will be terminated from the program unless the family requests an extension by submitting documentation from a reliable medical source that s/he will return within a total of 6 months (an additional 3 months.) See definition of temporarily absent in this section for further family requirements.

Medical Leave of Absence:

If the sole member of the household must leave the household to go to the hospital or nursing home, advice from a reliable medical source must be obtained as to the likelihood and timing of their return.

If the medical source informs the PHA that they will be permanently confined to a nursing home, they will be considered permanently absent. If they are temporarily confined, they will not be considered permanently absent. In no event, however, will the unit be considered their only place of residence when they are out of the household for more than 6 months or 180 days in a calendar year.

5. Visitors.

Visitors are allowed to stay for up to 30 days in the typical lease. If the person is a visitor and does not intend to become a "permanent" member of the family, the PHA does not have to consider this a change in family composition.

If an adult visitor stays in the unit for more than 30 days per year, they will be considered a member of the household, unless the PHA and the owner have approved an extension in writing for special circumstances.

Minors and college students who were part of the family but who now live away from home during the school year and are not considered members of the household may visit for up to 150 days per year without being considered a member of the household as long as they have written permission of the owner/manager to stay longer than 30 days.

In addition, in a joint custody arrangement, if the minor is in the household less than 183 days per year, the minor will be considered to be an eligible visitor and not a family member.

6. Adult Family Members Other than Spouse.

If other persons who were previously declared to be members of the family, such as members living in a spousal relationship, the family may declare in writing and provide proof that they will be absent from the unit for at least three months or more. If the PHA is satisfied with the family's explanation and documentation of the absence, the family member will be determined to be permanently absent from the unit. The family must cooperate and furnish information concerning the absence of a family member. Failure to cooperate and/or to furnish the requested information shall be grounds for termination from the Program.

Acceptable proofs of absence include utility bills, canceled checks for rent, telephone bills, or other documents that prove residency at another location.

7. Reporting to Owner.

The additional person, whether a family member or a visitor, must report to the owner/manager. The PHA will not process a new HAP Contract and Lease Amendment for the family until the family documents that they have the owner's approval. In the case of the minor or college student staying longer than 30 days, as described above, written permission must be obtained from the owner, allowing them to continue in residence as a visitor.

8. Reporting to the PHA.

The family must declare a member as permanently or temporarily absent in writing to the Housing Authority. The PHA will advise the family at that time, or at reexamination, what the options are and how it might affect the Total Tenant Payment or the Certificate or Voucher size.

B. AVERAGING INCOME

There are two methods to calculate income when the income is not received for a full year:

1. Annualizing current income (and subsequently conducting an interim reexamination if income changes); or
2. Averaging known sources of income that vary to compute an annual income (no interim adjustment if income remains what was calculated).

The PHA will use the annualizing current income method for all families unless the income cannot reasonably be annualized due to its uncertainty. In that case, the following considerations should be used as a guide. These considerations will be used unless a Supervisor approves a deviation.

Last year's income should be analyzed to determine the amount of income to be anticipated when it cannot be clearly verified.

If the last three months' income are representative of the income anticipated for the next year the last three months may be used to anticipate the income.

If the income verification anticipates an increase which can be verified, it should be calculated. For example, if the anticipated income from the employer shows a raise in pay which is to occur 4 months from the effective date of the recertification, income is to be calculated at the old rate for 4 months and at the new rate for 8 months.

If there are bonuses anticipated, but the employer does not know how much the bonus will be, the bonus from last year, if any, will be used for calculation purposes.

C. MINIMUM INCOME

HUD regulations and the PHA policy require a \$50 minimum total tenant payment toward rent and utilities.

Families who report zero income may be required to fill out the Personal Declaration statement/certification every 90 days.

D. TEMPORARILY ABSENT FAMILY MEMBERS' INCOME

The income of temporarily absent family members will be counted. If the spouse or the head of household is temporarily absent, his/her entire income is counted.

E. INCOME OF PERSON PERMANENTLY CONFINED TO NURSING HOME:

If a family member is permanently confined to the hospital or nursing home, and there is a family member left in the household, the PHA will calculate the total tenant payment by excluding the income of the person permanently confined to the nursing home and giving the tenant no medical deductions paid on behalf of the confined family member.

(For determination as to whether the person is confined to a nursing home on a temporary or permanent basis, see the definition of temporarily/permanently absent in this Plan.)

F. REGULAR CONTRIBUTIONS AND GIFTS

Regular contributions and gifts received from persons outside the household are counted as income.

This includes any regular payments on bills or other services, including rent and utility payments paid on behalf of the family, and other similar cash or noncash contributions provided on a regular basis.

Casual contributions or sporadic gifts are excluded as income. Cash contributions for groceries or other food items may also be excluded as income.

G. ALIMONY AND CHILD SUPPORT

Regular alimony and child support payments are counted as income. If the child support is not received on a regular basis, the PHA must count the amount of child support in the divorce decree or separation agreement unless the PHA verifies that the income is not provided.

In order to calculate with any other amount than the amount in the award, the PHA must obtain a certification from the tenant as to how much is being received on an annual basis and they must have documentation in the file that the family has filed with the agency responsible for enforcing the payments.

When payment history is received from the child support agency for the prior 12 months, the PHA will use the amount received over the last 12 months if no projection of anticipated income can be made.

H. LUMP SUM RECEIPTS:

Lump sum additions to Family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses are **not** included in income.

Lump sum payments caused by delays in processing periodic payments for Social Security or SSI is **not** counted as income.

Lump sum payments caused by delays in processing periodic payments such as unemployment or welfare assistance **is** counted as income.

Treatment of accumulated periodic payments because the income was deferred due to a dispute is handled no differently than periodic payments which are deferred because of processing problems. PHAs may develop a calculation which calculates retroactively or prospectively.

The calculation will be done prospectively for families who report the lump sum amount on a timely basis.

If the lump sum amount is received and reported so that if it results in an interim adjustment, it will be calculated as follows:

1. The entire lump sum payment will be added to the rest of the annual income at the interim;
2. The PHA will determine the percent of the year the interim represented (3 months would be 25% of the year, leaving a 75% balance);
3. At the next annual re-certification, the PHA will take 75% of lump sum and add to the rest of the annual income;
4. The lump sum will be used in the same method for any interim re-certification which occur prior to the next annual re-certification.

If the family does not report the lump-sum payment in a timely manner, the lump sum amount will be calculated retroactively by calculating the lump-sum retroactively, going back to the date the lump-sum payment was to be considered. If the lump-sum payment period started 5 months ago, for example, the entire lump-sum amount is added to the Annual Income in effect 5 months ago and the Total Tenant Payment and Tenant Rent is recalculated. The new Tenant Rent is taken times the number of months that had elapsed until the current calculation and the difference between what was paid and what should have been paid is determined.

At the PHA's option, the tenant will enter into a Repayment Agreement or be required to pay the entire amount.

Attorney Fees:

Attorney fees may be deducted from lump sum payments when computing annual income when:

1. The attorney's efforts have recovered a lump-sum compensation for the wrongful reduction or denial of a periodic payment, and;
2. The recovery does not include an additional amount in full satisfaction of the attorney fees.

In these situations, the tenant does not actually recover the entire amount of the past due periodic payment because s/he must pay the attorney fees.

This situation does not include those in which an amount is withheld from funds otherwise due the tenant to satisfy legitimate financial obligations unrelated to obtaining the income such as:

1. Withholding from wages to pay child support, alimony or judgement creditor;
2. Garnishment for failure to pay child support, alimony, or judgement creditor.

The above-mentioned situation does not include those where a tenant incurs attorney fees unrelated to asserting a right to a source of income or where no income results from the attorney's actions. These are the financial responsibility of the tenant and are not deducted in determining annual income.

I. CONTRIBUTIONS TO RETIREMENT FUNDS

Contributions to company retirement/pension funds are handled in this manner:

1. While an individual is employed, count only amounts the family can withdraw without retiring or terminating employment.
2. After retirement or termination of employment, count any amount the employee elects to receive as a lump sum.

J. ASSETS DISPOSED OF FOR LESS THAN FAIR VALUE

The PHA must count assets disposed of for less than fair market value during the two years preceding examination or reexamination of the family's income. The PHA will count the difference between the market value and the actual payment received.

Assets disposed of as a result of foreclosure or bankruptcy are not considered to be assets disposed of for less than fair market value. Generally, assets disposed of as a result of a divorce or separation are not considered to be assets disposed of for less than fair market value.

HUD does not specify a minimum threshold for counting assets disposed of for less than Fair Market value, but allows PHAs to establish a threshold in the Administrative Plan that will enable them to ignore small amounts such as charitable contributions.

The PHA's minimum threshold for counting assets disposed of for less than Fair Market value is \$5,000. If the total amount of assets disposed of within a one year period is less than \$5,000, they will not be considered an asset for the two-year period.

If the asset disposed of within a one year period is more than \$5,000, the assets disposed of for less than Fair Market value will be counted as an asset for two years from the date the asset was disposed of.

K. CHILD CARE

Child care cannot be given if there is a non-employed adult household member capable of caring for the child who can provide the child care. Examples of those adult members who would be considered unable to care for the child may include:

1. The adult member in a documented child abuse situation;
2. A documented medical condition that renders the person unable to provide care to a small child.

The reasonableness standard for child care is as follows:

Child care to work: The maximum child care allowed will be based on the amount earned of the person enabled to work. The "person enabled to work" will be the adult member of the household who earns the least amount of income from working.

Child care for school: The PHA will compare the number of hours the family member is attending school and base the reasonableness standard on the number of hours attending school (with the addition of 1 hour travel time each way to and from school) versus the number of hours claimed for child care.

Rate of Expense: The PHA will survey the local day care providers in the area/community to determine a reasonableness standard. The determination will be made only on a reasonable hourly rate.

If the child care provider is an individual, the individual must provide a notarized statement of the amount that is being charged.

L. MEDICAL EXPENSES

When it is unclear in the HUD rules as to whether or not to allow an item as a medical expense, IRS Publication 502 will be used as a guide.

Nonprescription medicines must be doctor recommended with a specific dosage in order to be considered as a medical expense.

M. OTHER EXCLUDED SOURCES OF ANNUAL INCOME

Annual income does not include the following:

1. Income from the employment of children (including foster children) under the age of 18 years old.
2. Payments received for the care of foster children or adults.
3. Amounts that are specifically for, or in reimbursement of medical expenses for any family member.
4. Income of a live-in Aide, as defined by HUD regulations.
5. Any form of student financial assistance.
6. Armed services hostile duty pay.
7. Any type of HUD training assistance payments.
8. Any disregarded amounts of SSI income under the Plan to Attain Self-Sufficiency (PASS) Program.
9. Any amounts received for reimbursement of out-of-pocket expenses for participation in a federal assisted self- sufficiency program.
10. A resident service stipend less than \$200 per month.
11. Compensation from State or local employment training programs with clearly defined objectives and with limited time income exclusions.
12. Temporary, nonrecurring or sporadic income(including gifts).World War II reparation payments paid by foreign governments.
13. Earnings in excess of \$480 for each full time student 18 years of age or older (excludes household head and spouse).
14. Adoption assistance payments in excess of \$480 per adopted.
15. Deferred periodic payments of supplemental security income and social security benefits received in a lump sum.
16. Refunds or rebates of state or local property taxes.
17. State payments for a developmentally disabled family member.
18. Any other amounts excluded by federal statute.

N. EXCEPTIONS TO MINIMUM RENT

Families who are subject to the PHA's \$50 minimum rent requirement may request an exception to the minimum rent requirement by making a written request for an exemption. A family may request an exception due to financial hardship which may include the following situations:

- the family has lost eligibility or is waiting for an eligibility determination for a federal, state, or local assistance program;
- the family would be evicted as a result of the imposition of the minimum rent requirement;
- the income of the family has decreased because of changed circumstance;
- a death in the family has occurred; or

- other circumstances determined by the PHA or HUD.

For definition purposes, “family” means the persons who have been declared by the family on the most recent Personal Declaration form and have been approved by the PHA to reside in the unit.

O. RETROACTIVITY OF HARDSHIP REQUESTS

If the family does not file a written request for an exemption within 30 days of receiving the PHA’s initial notification of exemption of minimum rent policies, the exemption request will not be applied retroactively.

P. VERIFICATION OF A FINANCIAL HARDSHIP

See Section VIII of this Administrative Plan.

Q. PROCEDURES FOR APPROVING MINIMUM RENT EXCEPTIONS

The PHA will promptly respond to a family’s written request for a minimum rent exception. If the family is determined to be a minimum rent family, the family’s total tenant payment will be adjusted for the following month unless the request for the exemption is made pursuant to subsection O above.

The PHA will make a determination based on the evidence and circumstances of the hardship request and promptly send written notice to the family either approving or denying the family’s request. If the PHA disapproves the family’s hardship request, the family may request an informal hearing. The request for a formal hearing must be made in writing and received by the PHA within 10 days after the denial notice to the family.

If the family is granted a hardship that meets the requirements of the subsection N above and is determined to be long-term, the family total tenant payment will be adjusted.

In the event the hardship request is not approved and the family owes a balance, the family will be required to enter into a repayment agreement pursuant to Section XXII of this Plan.

R. INCOME CHANGES DUE TO WELFARE PROGRAM REQUIREMENTS

The PHA **will not** reduce the family’s share of rent for families whose welfare assistance is reduced specifically reduced due to fraud, failure to participate in an economic self-sufficiency program, or non-compliance with a work activities requirement.

However, the PHA **will** reduce the family's rent if the welfare reduction is a result of the expiration or a lifetime time limit on receiving benefits or where the family has complied with welfare program requirements but cannot or has not obtained employment.

All total tenant payment determinations are subject to informal reviews.

VIII. VERIFICATION PROCEDURES

A. GENERAL POLICY

The PHA verifies income, family composition, status of full time students, value of assets, factors allowing a preference, and other factors before issuing certificates or vouchers to applicants.

B. METHODS OF VERIFICATION

In the order presented, the PHA will attempt to achieve verification:

1. Third Party Verification.

Third party verification is considered to be the most reliable means of verifying information provided by the family. Verification forms will be sent by mail to the appropriate third party with a request that the form be returned via mail. It is the intent of the Authority that the form shall never pass through the hands of the applicant/participant. The PHA will not allow tenants to "hand carry" or bring back verifications from the sources except as listed below.

In the event that third party written verification is not possible due to an unwillingness by the source to respond to the PHA's request or in the event that the information is not returned within a four week period, staff will be advised to note the file accordingly and then to proceed with the third party oral verification.

Oral verification will be achieved through interviewing the source. When third party oral verification is used, staff will be required to document who they spoke with, the date of the conversation, and the nature (facts provided) of the conversation.

Use of Computer Print-Outs:

Because many public agencies have converted to the use computer-generated forms, the PHA will accept all such computer forms from the family as documentation of third party written verification. Such sources and forms may include but are not limited to:

- social security benefits;
- Veteran's Administration benefits;
- Public Assistance and/or Aid to Dependent Children Benefits;
- unemployment benefits;
- child support payments through agency enforcement.

2. Review of Documents.

For payments made to families from public agencies as noted above, the PHA will review the family supplied document and compare the furnished income information with the family's completed Personal Declaration Form. If there are any discrepancies, the PHA will obtain a third-party verification from the public agency.

In the event that neither the third party written or oral verification is possible, the PHA will rely upon the family's hand-carried information.

All other sources of declared income and assets, will be subject to third-party verification procedures.

3. Applicant Certification/Self-Declaration.

When verification cannot be effectuated by either form of third party verification or review of documents, the family may be required to submit a notarized statement. Notarized statements are only to be used as a last resort.

No government checks will be photocopied. The Document Viewed form will be used to record the verification.

C. RELEASE OF INFORMATION

Families will be asked to sign appropriate release of information forms, as well as a blanket verification. Each member so requested to consent to the release of information will be provided with a copy of the appropriate forms for their review and signature.

Each verification form will contain the appropriate family members' signature as proof of:

- Their consent to the "third party" for release of specified information;
- Evidence of their understanding of the type/nature of information being sought.

A family's refusal or failure to cooperate with the PHA's prescribed verification system will result in the termination of the family's application and/or termination of housing assistance.

D. COMPUTER VERIFICATION

Where authorized by HUD and/or other State or local agencies, computer matching will be done. Where computer card or computer printouts are a feasible method of verification, those sources will be utilized.

E. ITEMS TO BE VERIFIED

All Income unless specifically excluded by the regulations;

Current Assets (for those assets disposed of for less than fair market value in preceding two years, verification will simply be a "self certification");

Social Security Numbers for all family members age 6 and over;

Full-time student ("FTS") Status (as defined by the institution for persons carrying equivalent of what school considers to be full-time for "day" students) — includes High School students who are 18 or over;

Total Medical Expenses for "elderly" families only whose head or spouse is 62 years of age or older or handicapped or disabled according to the HUD definition;

Child Care Expenses are allowed when they permit an adult family member to be gainfully employed or to further their education;

Disability Assistance Expenses may include only those costs associated with attendant care or auxiliary apparatus which allows an adult family member to be gainfully employed;

Family Requesting a Larger Unit than Applicable under the PHA's Occupancy Standards only where family can show that larger unit is needed for "medical purposes" or other extenuating circumstances);

Citizenship or Immigration Status of all Family Members;

Persons Requesting "Preference" Status, based upon preferences approved in the applicable policies pertaining to the various programs;

Zero-Income Status of household will be verified initially and every 90 days thereafter. Families alleging to have no income will be required to execute verification forms to determine if other income such as unemployment benefits, TANF, SSI, etc. are not being

received by the household. The responses of these types of income will then serve as third party independent verification.

The PHA may request a credit report on these families to determine if there are any monies being paid on behalf of the household on a regularly recurring basis that should be included as income for rent determination purposes.

F. ACCEPTABLE FORMS OF VERIFICATION

Specific information must be obtained on verifications to verify the information received by the applicant. The following verification information will be considered acceptable by the PHA in the order listed:

Employment Income:

Any verification form must request the employer to specify the:

- Frequency of pay;
- Effective date of the last pay increase; and
- Probability and effective date of any increase during the next 12 months.

Acceptable forms of verification include (in this order):

1. Employment verification form completed by the employer.
2. Check stubs or earning statements showing employee's gross pay per pay period and frequency of pay.
3. W-2 forms if applicant has had the same job for at least two years and pay increases can be accurately projected.
4. Notarized statements, affidavits or income tax returns signed by the applicant describing self-employment and amount of income or income from tips and other gratuities.

Social Security, Pensions, Supplementary Security Income (SSI), Disability Income:

1. Benefit verification form completed by agency providing the benefits.
2. Award or benefit notification letters prepared and signed by the authorizing agency. (Since checks or bank deposit slips show only net amounts remaining after deducting SSI or Medicare, they may be used only when award letters cannot be obtained.)

Unemployment Compensation:

1. Verification form completed by the unemployment compensation agency.
2. Records from unemployment office stating payment dates and amounts.

Public Assistance:

1. **All Public Assistance Programs.** Welfare agency's written statements as to type and amount of assistance family is now receiving, and any changes in assistance expected during the next 12 months.

Alimony or Child Support Payments:

- Copy of a separation or settlement agreement or a divorce decree stating amount and type of support and payment schedules.
- A letter from the person paying the support.
- Copy of latest check. PHA must record the date, amount, and number of the check.
- Applicant's notarized statement or affidavit of amount received or that support payments are not being received and the likelihood of support payments being received in the future.

If payments are irregular:

- a. Copy of separation or settlement agreement or a divorce decree stating amount and type of support and payment schedules.
- b. Statement from agency responsible for enforcing payments to show that family has filed.
- c. Applicant's notarized statement or affidavit of amount received.

Earned Income Tax Credit:

- a. For credits applied in one lump sum against tax liability, use Income Tax Return (IRS Form 1040 or 1040A).
- b. For credits applied in one lump sum against tax liability, use IRS Form W-5 (Earned Income Credit Advance Payment Certificate).

Net Income From A Business:

The following documents show income for the prior years. PHAs must consult with tenants and use this data to estimate income for the next 12 months.

1. IRS Tax Return, Form 1040, including any of the following:
 - Schedule C (Small Business);
 - Schedule E (Rental Property Income);
 - Schedule F (Farm Income).
2. An accountant's calculation of depreciation expense, computed using straight-line depreciation rules. (Required when accelerated depreciation was used on the tax return or financial statement.)
3. Audited or unaudited financial statement(s) of the business.
4. Loan Application listing income derived from the business during the previous 12 months.
5. Notarized statement or affidavit as to net income realized from the business during previous years.

Recurring Gifts:

1. Notarized statement or affidavit signed by the person providing the assistance. Must give the purpose, dates and value of gifts.
2. Applicant's notarized statement or affidavit that provides the information in Paragraph H 1 above.

Scholarships, Grants, and Veterans Administration Benefits for Education:

1. Benefactor's written confirmation of amount and purpose of assistance.
2. Statement from the educational institution confirming the purpose of the financial aid.

Family Assets Now Held:

For non-liquid assets, collect enough information to determine the current cash value — the net amount the family would receive if the asset were converted to cash.

1. Verification forms, letters, or documents from a financial institution, broker, etc.
2. Passbooks, checking account statements, certificates of deposit, bonds, or financial statements completed by a financial institution or broker.

3. Quotes from a stock broker or realty agent as to net amount family would receive if they liquidated securities or real estate.
4. Real estate tax statements if tax authority uses approximately market value.
5. Copies of closing documents showing the selling price, the distribution of the sales proceeds and the net amount to the borrower.
6. Appraisals of personal property held as an investment.
7. Applicant's notarized statements or signed affidavits describing assets or to verifying cash held at the applicant's home or in safe deposit boxes.

Assets Disposed of For Less Than Fair Market Value (FMV) During Two Years Preceding Effective Date of Certification or Re-certification:

1. For all Certifications and Re-certifications, the PHA will obtain the Family's certification as to whether any member has disposed of assets for less than fair market value during the two years preceding effective date of the certification or re-certification.
2. If the family certifies that they did dispose of assets for less than fair market value — a certification that shows: (a) all assets disposed of for less than FMV; (b) the date they disposed of the assets; (c) the amount the family received; and (d) the asset's market value at the time of disposition.

Saving Account Interest Income and Dividends:

1. Account statements, passbooks, certificates of deposit, etc., if they show enough information and are signed by the financial institution.
2. Broker's quarterly statements showing value of stocks, bonds or the earnings credited the applicant.
3. If the IRS accepts an IRS Form 1099 from the financial institution, the PHA must adjust the information to project earnings expected for the next 12 months.

Interest Income From Sale of Real Property Pursuant to a Purchase Money Mortgage, Installment Sales Contract, or Similar Arrangement:

1. A letter from an accountant, attorney, real estate broker, the buyer, or a financial institution stating interest due for next 12 months.
2. Amortization schedule showing interest for the 12 months following the effective date of the certification.

3. If the IRS accepts an IRS Form 1099 from the financial institution, the PHA must adjust the information to project earnings expected for the next 12 months.

Rental Income from Property Owned by Applicant: (PHAs must adjust these amounts for changes expected during the next 12 months.)

1. IRS Form 1040 with Schedule E (Rental Income).
2. Copies of latest rent checks, leases, or utility bills.
3. Documentation of applicant's income and expenses in renting the property (tax statements, insurance premiums, receipts for reasonable maintenance and utilities, bank statements or amortization schedules showing monthly interest expense).
4. Lessee's written statement identifying monthly payments due the applicant and applicant's affidavit as to net income realized.

Full-Time Student Status:

1. Written verification from the registrar's office or appropriate school official.
2. School records indicating enrollment for sufficient number of credits to be considered a full-time student by the school.

Child Care Expenses:

1. Written verification from the person who receives the payments. If the child care provider is an individual, they must provide a notarized statement of the amount they are charging the tenants for their services.
2. Verifications must specify the child care provider's name, address, and phone, the names of the children cared for, and the frequency (number of times the babysitting occurs), the rate of pay, and the typical yearly amount, including school and vacation periods.
3. Applicant's certification as to whether any of those payments have been or will be reimbursed by outside sources.

Medical Expenses:

1. Written verification by a doctor, hospital or clinic personnel, dentist, pharmacist, etc., of:

- a. the estimated medical costs to be incurred by the applicant and of regular payments due on medical bills;
 - b. the extent to which those expenses will be reimbursed by insurance or a government agency.
2. The insurance company's or employer's written confirmation of health insurance premiums to be paid by the applicant.
 3. Social Security Administration's written confirmation of medicare premiums to be paid by the applicant over the next 12 months.
 4. For attendant care:
 - a. Doctor's certification that the assistance of an attendant is medically necessary;
 - b. Attendant's written confirmation of hours of care provided and the amount and frequency of payments received from the family (or copies of canceled checks the family used to make those payments);
 - c. Applicant's certification as to whether any of those payments have been or will be reimbursed by outside sources.
 4. Receipts, canceled checks, or pay stubs that indicate health insurance premium costs, etc., that verify medical and insurance expenses also likely to be incurred in the next 12 months.
 5. Copies of payment agreements with medical facilities or canceled checks that verify payments made on outstanding medical bills that will continue over all or part of the next 12 months.
 6. Receipts or other record of medical expenses incurred during the past 12 months that can be used to anticipate future medical expenses. PHA may use this approach for "general medical expenses" such as non-prescription drugs and regular visits to doctors or dentists, but not for one-time, nonrecurring expenses from the previous year.

The PHA will use mileage at the rate approved by the Board for the PHA or cab receipts with to/from addresses listed for verification of the cost of transportation directly related to medical treatment.

Medical Need for Larger Unit:

A physician must certify that such arrangements are medically necessary. The family member must be under the direct and present care of the physician.

Assistance to Disabled persons:

1. Attendant Care:

- a. Attendant's written certification as to the amount received from the applicant/tenant; frequency of receipt; hours of care provided; and/or copies of canceled checks applicant/tenant used to make those payments;
- b. Certifications required below.

2. Auxiliary Apparatus:

- a. Receipts for purchases of, or evidence of monthly payments for, auxiliary apparatus;
- b. In the case where the disabled person is employed, a statement from the employer that the auxiliary apparatus is necessary for employment.

3. In All Cases:

- a. Written certification from a physician or a rehabilitation agency that the disabled person requires the services of an attendant or the use of auxiliary apparatus to permit the disabled person to be employed or to function sufficiently independently to enable another family member to be employed.
- b. Family's written certification as to whether they receive reimbursement for any of the expenses in paragraph one and two above and the amount of any reimbursement received.

G. VERIFYING FACTORS OF ELIGIBILITY

The following types of verification will be acceptable as methods to document tenants' statements regarding family status.

To verify blood relationship, use drivers license or work ID to verify name.

For marriage, use legal certificate of marriage to verify relationship.

For stable family relationship, use these types of proof:

- a. Joint bank accounts or loans;
- b. Prior or current lease or rental agreements documenting cohabitation;
- c. Credit report showing residence and joint financial activity.

There must be verification of all family members. Birth certificates or other evidence to document identification must be submitted.

Verification for adults would include one of these forms:

- a. Certificate of Birth, naturalization papers;
- b. Church issued baptismal certificate;
- c. Legal driver's license;
- d. US military discharge;
- e. US passport;
- f. Voter's registration;
- g. Company ID;
- h. Health and Human Services ID;
- i. Social Security ID.

Verification for minors would include one of these forms:

- a. Certificate of Birth;
- b. Adoption papers;
- c. Custody agreement;
- d. Health and Human Services ID;
- e. School records.

Verification of divorce status would be accomplished by viewing a copy of the divorce decree, signed by a Court Officer.

Verification of a separation would be a copy of court-ordered maintenance.

Verification of guardianship would be:

- a. Court-ordered assignment;
- b. Notarized declaration of parent;
- c. Verification from social services agency;
- d. School records.

H. VERIFICATION OF CITIZENSHIP OR IMMIGRATION STATUS

Unless the PHA has a reason to doubt a family's claim of U.S. citizenship, the PHA will not verify U.S. citizenship.

If a family claims that any or all of the family members are aliens, the PHA will request to view any of the following original documents:

- a. Resident Alien Card (I-551);
- b. Alien Registration Receipt Card (I-151);
- c. Arrival Departure Record (I-94);
- d. Temporary Resident Card (I-688);
- e. Employment Authorization Card (I-688B);
- f. Receipt issued by INS for issuance of replacement of any of the above documents;
- g. Other accepted evidence as announced by INS.

The PHA will utilize the INS SAVE system to verify immigration status.

I. EXEMPTION TO MINIMUM RENT REQUIREMENT

Loss of benefits — TANF, Social Security, or other forms of assistance: Third party verification from the administrative agency specifying the reason for loss or reduction of benefits.

Applying for benefits — TANF, Social Security or other forms of assistance: Third party verification from the administrative agency acknowledging that an application was received from the family.

Eviction — Copy of eviction notice from the family's landlord. The eviction notice must specify the reason(s) for the eviction.

Loss of income — Third party verification from the employer confirming the loss of income.

Death of family member — Copy of death certificate or an obituary notice which clearly indicates the relationship between the family head and the deceased person.

J. ACCOMMODATION DUE TO HARDSHIP

Requests for reasonable accommodation from persons with disabilities will be granted upon verification that they meet the need presented by the disability and they do not create

an undue financial and administrative burden for the PHA, meaning an action requiring significant difficulty or expense. In determining whether the accommodation would create an undue hardship, the following guidelines would apply:

- a. The nature and cost of the accommodation needed;
- b. The number of persons likely to need such an accommodation and the likely impact on the operation of the Section 8 Program as a result of the accommodation.

All requests for accommodation or modification will be verified with reliable, knowledgeable professionals.

IX. BRIEFING OF FAMILIES AND ISSUANCE OF CERTIFICATES/VOUCHERS

A. BRIEFINGS

1. Purpose of the Briefing:

The purpose of the briefing is to explain the Certificate or Voucher holder's packet to each family. The family will also be informed of their Section 8 family obligations.

2. Briefing Attendance Requirement:

All families are required to attend the briefing class when they are initially issued a Certificate or Voucher. No Certificate or Voucher will be issued unless the head (and spouse, if applicable) has attended a briefing class.

A family who provides prior notice of their inability to attend a briefing class will be scheduled for the next briefing class. Only one rescheduled class is permitted.

Failure of a family to participate in a scheduled briefing class may result in withdrawal of their application. The family will be notified of their withdrawal from the wait list and of their right to an informal review.

3. Format of the Briefing:

Briefing of Certificate or Voucher holders is generally handled on a group basis by a Section 8 staff member. When group briefings are conducted, families are given the opportunity to ask questions, especially those related to their Total Tenant Payment calculation (or Housing Voucher Subsidy calculation in the case of a Voucher) and how utility allowances are calculated. Families will be requested to sign relevant documents, including their Certificate/Voucher, prior to the briefing.

Certificate holders are briefed separately from Voucher holders.

The family will be provided a certificate or voucher briefing packet that will contain the items required by HUD regulations.

In addition to supplying the family with a briefing information packet, the PHA will conduct an oral briefing which will include information on the following subjects:

- A description of how the program works;

- Family and owner responsibilities;
- Where the family may lease a unit - outside or inside of the PHA's jurisdiction;
- Explanation on portability policies and procedures;
- Explanation of the advantages of moving to an area;
- that does not have a high concentration of low income families;
- Briefing packet items;
- Exception Rents for certificate families;
- Exception Rent Payment Standards for Voucher families;
- Over FMR tenancies with the Certificate Program.

4. Household Obligations under the Section 8 Program:

Under the Section 8 Existing or Housing Voucher Program, the relationship between tenant and landlord are the same as in the private housing market.

However, once the family receives a Section 8 Certificate, the family has the following additional obligations:

- Finding a rental unit which is the correct size (for the Certificate Program within the Fair Market Rent prescribed by regulation or exception and meets the minimum standards of HQS for size of the unit);
- Turning in the Request For Lease Approval Form to the PHA within the Certificate or Voucher period for PHA approval;
- Keeping appointments set by the PHA for determination of continued eligibility and unit compliance with HQS;
- Notifying the PHA in a timely manner, as defined in this Section XV of this Administrative Plan, of changes in household composition and income;
- Notifying their owner and the PHA prior to moving from their unit;
- Complying with other obligations of the family as listed on the family's Certificate or Voucher.

5. Owner Referrals:

Certificate and Voucher holders are notified at their briefing session that the PHA updates the listing of available housing and makes it available at the PHA's offices.

6. PHA Policy on Furnishing Information to Prospective Landlords:

Upon a prospective landlord's written request, the PHA will furnish the family's current address and the name and address of the family's current and previous landlord if the information is available from the PHA's records. No other information will be furnished without the written consent of the family.

B. SECURITY DEPOSIT REQUIREMENTS

The owner may collect a security deposit from the family that is not in excess of private market practice. The PHA will allow a prospective owner to collect a security deposit of not more than one month of the PHA-approved contract rent from the family. When the tenant moves from the unit, the owner, subject to local and state law, may use the security deposit for unpaid rent, unit damages, or for other amounts the family owes under the lease. Owners must comply with HUD regulations in order to participate in the Section 8 Program.

C. CERTIFICATE AND VOUCHER ISSUANCE

At the briefing session, each family will be issued a Certificate of Family Participation or Housing Voucher which is a contract between the PHA and the household specifying the rights and responsibilities of each party.

1. Expirations:

The Certificate or Voucher is valid for a period of 60 days from the date of issuance. Prior to expiration, the family may contact the PHA to inquire about assistance the PHA can provide the family in locating suitable housing.

The family must submit a Request for Lease Approval and Lease within the 60-day period unless an extension has been granted by the PHA.

2. Extensions:

A family may request an extension of the Certificate/Voucher time period. All requests for extensions must be received prior to the expiration date of the Certificate/Voucher, unless the expiration date falls on a weekend or holiday.

Extensions are permissible at the sole discretion of the PHA primarily for the following reasons:

- Extenuating circumstances such as hospitalization or a family emergency for an extended period of time which has affected the family's ability to find a unit within the initial 60 day period. Verification is required.
- The family has evidenced that they have made a good faith effort to locate a unit and request support services from the Housing Counselor, throughout the initial 60 day period with regard to their inability to locate a unit (especially applicable to large families.)
- The family has submitted a Request for Lease Approval prior to the expiration of the 60-day period, but the unit has not passed a Housing Quality Standards inspection.
- The family is disabled and requests accommodation pursuant to HUD regulations.

The PHA staff extends in one or more increments, generally of 2 weeks each, not to exceed an additional 30 days. Unless approved by the Coordinator, no more than two extensions will be granted. The maximum time period for a Certificate or Voucher cannot exceed 120 days. Disabled families must obtain HUD approval beyond 120 days.

D. PORTABILITY OF CERTIFICATES AND VOUCHERS

1. General Policies:

A family issued a certificate or voucher may lease a unit anywhere in the jurisdiction of the PHA or outside the PHA jurisdiction as long as household head or spouse already had established a legal domicile in the PHA's jurisdiction at the time the family first submitted an application for participation in the Section 8 Program.

If the family did not establish a legal domicile at the time of the family's application, the family does not have any legal right to lease a unit outside of the PHA's jurisdiction within the first 12 months after the family is initially admitted to the Section 8 Program. An exception may be granted by the PHA if the family cites economic or personal hardship that can be documented and if the family obtains the approval of the "receiving housing authority."

2. Income Eligibility:

a. Admission to the Section 8 Program

A family must become eligible to be admitted to the Existing Certificate or Housing Voucher Program where the family initially leases a unit. In the event of a family who under

portability rules, transfers their certificate or voucher to a “receiving housing authority”, the family must meet income eligibility guidelines of the receiving housing authority.

b. Current Participants

If the portable family is already a participant in the initial housing authority’s Section 8 Program, income eligibility is not redetermined unless the family transfers between the Certificate and Voucher Programs.

3. Initial Housing Authority Administration of Portability:

When the PHA becomes the “initial housing authority”, the PHA will comply with HUD regulations.

4. Receiving Housing Authority Administration of Portability:

When the PHA becomes the “receiving housing authority”, the PHA will decide the type of housing assistance that will be provided to the portable family. The PHA may change the type of housing assistance if the family is not income eligible for the type of housing assistance.

Other aspects of administration will be subject to HUD regulations and the PHA’s internal Section 8 administrative policies.

X. LOCATING SUITABLE HOUSING

A. RESPONSIBILITY FOR LOCATING HOUSING

After a Certificate or Voucher has been issued to the family, it is the family's responsibility to locate suitable housing. This means that the housing must be within the rent limitations set by the Section 8 Program and meet Housing Quality Standards requirements, including minimum bedroom size requirements for units.

The PHA will maintain updated referral lists of owners who have called the PHA to list their available units. The list will be made available to Certificate and Voucher holders upon request.

Referrals lists will be available in the PHA office lobby and on the PHA's bulletin board.

B. ELIGIBLE TYPES OF HOUSING

The following types of housing may be utilized in the Certificate and Voucher program (unless designated otherwise):

- All structure types can be utilized, including but not limited to single family, duplex, or multifamily garden apartments, town houses, and high rises;
- Manufactured homes where the tenant leases the mobile home and the pad;
- Manufactured homes where the tenant owns the mobile home and leases the pad (Certificate Program only);
- Independent Group Residences;
- Congregate Housing.

Housing owned by the family being subsidized is prohibited except for manufactured homes identified above for the Certificate Program only.

C. REQUEST FOR LEASE APPROVAL AND LEASE

The Request for Lease Approval and the Owner's Lease must be submitted prior to the expiration of the Certificate or Housing Voucher, unless the Certificate or Voucher has been extended by the PHA.

The Request for Lease Approval Form must be signed and submitted to the PHA by both owner and Certificate/Voucher holder with an unsigned copy of the lease that the owner will be using for the unit.

The PHA will approve the lease and the Request for Lease Approval Form if the lease conforms to HUD and PHA requirements and if the Request for Lease Approval Form is properly executed by both parties. The PHA reserves the right to reject the Request for Lease Approval if the gross rent (proposed contract rent plus tenant paid utilities) exceeds the Fair Market Rent of the family's Certificate bedroom size and is not supported by a comparable rent analysis.

D. VOUCHER AFFORDABILITY INDEX

The PHA will not approve a unit for a Voucher Contract if a family's rent burden exceeds 40%. The PHA believes that an excessive rent burden is a strong indication of under reporting of income to the PHA. Rent burden for the Voucher Program is defined as the amount that a family must pay toward rent, utilities, child care, and un-reimbursed medical expenses as a percentage of the family's adjusted monthly income that has been reported to the PHA.

E. OVER FMR TENANCY AFFORDABILITY INDEX

The PHA will not approve a unit for an Over FMR tenancy Contract if a family's rent burden exceeds 40%. Rent burden is defined as the amount that a family must pay toward rent, utilities, child care, and un-reimbursed medical expenses as a percentage of the family's adjusted monthly income that has been reported to the PHA.

F. PHA DISAPPROVAL OF OWNER

The PHA will not approve an owner's unit if HUD has informed the PHA that the owner is debarred, suspended, or subject to limited denial of participation. HUD may also direct the PHA deny an owner to participate for violations of fair housing or other federal equal opportunity requirements.

The PHA may also deny approval to lease a unit from an owner if the owner has:

- Violated owner obligations under a Section 8 housing assistance payments contract;
- Committed fraud, bribery, or any other current or criminal act in connection with any federal housing program;
- Engaged in drug trafficking;
- A history or practice of non-compliance with HQS for units assisted by the PHA's Section 8 Program;
- Not paid State or local real estate taxes or fines.

XI. HOUSING QUALITY AND STANDARDS AND INSPECTIONS POLICIES

A. GENERAL PURPOSE

The PHA is required by HUD regulations to inspect the unit to ensure that it complies with Housing Quality Standards.

No unit will be initially placed on the Section 8 Existing Housing Program unless these standards are met. Units must also meet the Housing Quality Standards to remain under contract with the PHA.

There are **five** types of inspections the PHA will perform:

- Initial
- Annual
- Complaint
- Move-Out (if applicable)
- Quality Control

The Housing Quality Standards take precedence over local housing codes and other pertinent codes.

B. ACCEPTABILITY CRITERIA AND EXCEPTIONS TO HQS

The PHA adheres to the acceptability criteria in the Section 8 Program regulations and HUD Inspection Booklet with the following exceptions:

- The PHA has initiated the following policy to ensure that units meet the Interior Air Quality requirements that "the unit must have adequate air circulation." Units that have not been provided an air conditioning unit or evaporative cooler by the landlord will be required to have screens on one exterior window per room, if the window can be opened.
- Landlords will be required to scrape peeling paint and repaint all surfaces cited for peeling paint with 2 coats of non-lead paint or otherwise suitably cover the area. An extension may be granted as a severe weather-related item as defined below.
- Adequate heat shall be considered to be 68 degrees.
- The PHA may fail unsanitary conditions where exposed food, garbage, and excrement exists to a degree where health may be endangered.

- Plastic trash bags will not be considered "adequate covered facilities" in buildings with 4 or more units. Suitable containers for the temporary storage of refuse must be used.
- In units where the tenant must pay for utilities, each unit must have separate metering device(s) for measuring utility consumption.

Severe weather related items such as exterior painting and outside concrete work for porches, steps, and sidewalks will be given a deadline to correct the item if the outside temperature or weather prohibits the repair or replacement for compliance with Housing Quality Standards. If the unit does not pass inspection at a later time specified by the PHA, the PHA may abate rent and cancel the HAP Contract for owner noncompliance.

At the PHA's sole discretion, extensions of up to 30 days may be granted to permit a landlord to complete repairs if the landlord has made a good faith effort to initiate repairs. If repairs are not completed within 60 days after the initial inspection date, the PHA may abate rent and cancel the HAP contract for owner noncompliance.

C. CLEARING DEFICIENCIES FOR INITIAL INSPECTIONS

The PHA will schedule a timely inspection of the unit on the date the owner indicates the unit will be ready for inspection or as soon as possible thereafter (generally within ten working days) upon receipt of a Request for Lease Approval and Lease. The family and the owner will be notified of the results. If the unit fails the Housing Quality Standards inspection, the family and the owner will be advised to notify the PHA once the repairs are completed.

On an initial inspection, the owner will generally be given up to 30 days to correct the items noted as "Fail," depending on the extent of the repairs that are required to be made.

The PHA also reserves the right to refuse to conduct the inspection if the unit is not ready for inspection.

The owner will generally only be allowed up to two re-inspections for repair work to be completed, at the Inspector's discretion.

When a family properly submits a unit for PHA inspection, the "clock" stops on the amount of time (initially 60 days) for the family to find suitable housing. The "clock" restarts when the PHA rejects the unit and requests the family to submit another unit to be placed under a HAP contract.

D. DEADLINE FOR CORRECTING HQS FAIL ITEMS FOR CONTRACT UNITS

The owner or tenant must be given time to correct the failed items cited on the inspection report for a unit under contract. If the item endangers the family's health or safety (using the emergency item list below), the owner or tenant must be given 24 hours to correct the violations. For less serious failures, the owner or tenant may be given up to 30 days to correct the item(s)

E. EMERGENCY FAIL ITEMS

The following items are to be considered of an emergency nature and are to be corrected by the owner or tenant within 24 hours of notice by the Inspector:

- Broken lock on first floor window or door;
- Electrical outlet smoking or sparking;
- Entire window, including storm window, missing (weather problem);
- Escaping gas from gas stove;
- Major plumbing leak(s);
- Natural gas leak or fumes;
- Electrical situation which could result in shock or fire;
- Inability to maintain 68EF room temperature;
- No water;
- No electricity.

The PHA may give a short extension (not more than 48 additional hours) where the owner or tenant cannot be notified or it is impossible to repair within the 24 hour period.

If emergency items that are the owner's responsibility are not corrected within 72 hours, the HAP Contract will be canceled.

If emergency items are the tenant's responsibility to correct and are not corrected within 72 hours, the PHA will propose termination by sending written notice to the tenant and owner. The tenant will be offered an informal hearing before the PHA takes final action. The tenant and owner shall be given written notice of the PHA's decision to terminate housing assistance.

F. ABATEMENT POLICIES

When it has been determined that a unit on the program fails to meet Housing Quality Standards and the owner has been given an opportunity to correct the problem(s) and

does not do so within the time frame established by the PHA (up to 30 days), the rent for the unit shall be abated.

The initial abatement period shall be 10 days or less. If the correction is not made, the abatement will continue through the HAP Contract cancellation notice.

The PHA will inspect abated units within 3–5 days of the owner's contact with the PHA to report the completed work.

The abatement will end the first business day following the owner's call if the unit passes inspection.

The owner will not be abated for tenant caused HQS violations. Tenants will be given up to 30 days to correct any deficiencies. If the repairs are not completed by the deadline, the PHA will send a proposed notice of termination to the tenant and the owner.

G. HAP CONTRACT TERMINATION FOR OWNER CAUSED HQS VIOLATIONS

If the owner fails to correct all the items within the initial ten day abatement period, the PHA will send a contract termination notice to the owner and tenant. During this period (minimum 30 days notice prior to the first of the month), the abatement will remain in effect.

When the Housing Assistance Payments Contract or the Voucher Subsidy Contract is terminated for Housing Quality Standards violation(s), it cannot be reinstated unless the repairs are done and the PHA is notified before the effective termination date. The tenant must also agree to remain in the unit.

If the HAP Contract termination notice has been sent to the owner, only one additional Housing Quality Standards inspection will be conducted to verify if repairs have been completed.

H. HAP CONTRACT TERMINATIONS FOR TENANT CAUSED HQS VIOLATIONS

If the tenant fails to make the required repairs by the PHA's deadline, the PHA will send a proposed notice of termination to the tenant and owner. The proposed termination notice will offer the tenant an opportunity to request an informal hearing with the PHA. If the tenant fails to request an informal hearing with the PHA within the designated deadline, the PHA will send a final notice of termination to the tenant and owner. The final notice will be 30 day advanced written notice to the owner. The owner will continue to receive a housing subsidy until the final effective termination date.

If the tenant is granted an informal hearing, the owner will continue to receive a housing subsidy until otherwise notified in writing by the PHA.

I. RESPONSIBILITY OF THE FAMILY TO ALLOW INSPECTION

The PHA must be allowed to inspect the unit at reasonable times with reasonable notice. The family is notified of the inspection appointment by mail. If the family is not able to be at home, the family must call to reschedule the inspection or make arrangements to have an adult family representative or the landlord present.

If the family misses the inspection appointment and does not arrange for the representative or the landlord to be there, one more inspection (or reinspection) appointment will be scheduled.

If the family misses two inspection appointments, the PHA will consider the family to have violated a family obligation and their assistance will be terminated, following the termination of assistance procedures.

XII. LEASE APPROVAL AND HAP/VOUCHER CONTRACT EXECUTION

A. DOCUMENTS SUBMITTED

Landlords may use their own lease if the lease complies with the HUD regulations and State and local law. The PHA will not generally review the lease for compliance with state and local law. All landlord leases will be amended by the HUD Lease Addendum form.

The family is required to submit the Lease and Request for Lease Approval prior to the expiration of the Certificate or Voucher. The PHA will only process one Request for Lease Approval at a time. The PHA will notify the tenant and the landlord if the unit and lease have been approved or rejected.

Owners must also submit proof of ownership of the property and/or the Management Agreement if the property is managed by a management agent. Proof of Ownership may be in the form of deeds, property tax invoices, property insurance documents or closing statement forms. Land Contracts recorded at the Franklin County Auditor's office are also acceptable. Purchase contracts and subleasing agreements are unacceptable.

B. FAIR MARKET RENT LIMITATIONS

The gross rent (contract rent plus tenant-paid utilities) for a Certificate Program unit shall not exceed the Fair Market Rent applicable for such units on the date of Lease approval unless an accommodation is being made for a disabled family (up to 120% of the Fair Market Rent) or the PHA has approved an Over FMR tenancy. In either case, a rent reasonableness determination must be conducted by the PHA.

C. EXCEPTION RENT AREAS

Exception rents for suburban areas have been approved by the local HUD office and are on file at the PHA's offices. These exception rent areas have been authorized by HUD.

D. OVER FAIR MARKET RENT TENANCY

An Over Fair Market Rent (FMR) tenancy permits a Certificate family to rent a unit without considering the Fair Market Rent ceiling. Because the gross rent (contract rent plus utility allowance) exceeds the Fair Market Rent, the family may pay more than 30 percent of their adjusted monthly income toward rent and utilities.

The PHA may approve up to 10 percent of incremental allocations of HUD approved budgeted Certificate units for Over FMR tenancies, excluding units awarded to the PHA for conversions of Section 8 project-based units to tenant-based assistance.

Over FMR tenancies for Certificate families will be approved individually, on a first come, first serve basis at the sole discretion of the PHA.

No additional Over FMR tenancies will be approved if the maximum number of Over FMR tenancies is attained.

E. RENT REASONABLENESS DETERMINATION FOR CERTIFICATES AND FOR CERTIFICATES APPROVED FOR OVER FMR TENANCIES

The PHA will make a determination as to whether the rent to an owner is a reasonable rent in comparison to rent charged for other comparable unassisted units.

Rent reasonableness determinations are made when units are placed under HAP contract for the first time; if an owner requests a rent increase; if there is a 5 percent decrease in the HUD published Fair Market Rents; if HUD so directs the PHA to conduct a rent comparability analysis on a unit(s); or the PHA, in its sole discretion elects to do so.

The PHA will determine, on a case-by-case basis, that the approved rent:

- Does not exceed the maximum rent allowed by HUD;
- Does not exceed rents charged by the owner for comparable unassisted units in the premises;
- Is reasonable in relation to rents charged by the owner for comparable unassisted units in the open market.

When comparing Section 8 assisted units with open market units, the PHA will consider the location, quality, size, unit type, age, amenities, housing services, maintenance and utilities to be provided by the owner.

The PHA utilizes a database with the above listed information and rental rates on unassisted rental units in the metropolitan area to determine a reasonable rent for a Section 8-assisted unit. The PHA will inspect the Section 8 property and evaluate it based upon its comparability to nearby unassisted units, using numerical values to evaluate the unit and compare it to other units. The PHA reserves the right to make adjustments to an owner's requested rent based upon the above indicators in evaluating properties for rent reasonableness.

The PHA will maintain records which include comparable data on open market units and the evaluation of the Section 8 unit. These factors are utilized to determine a reasonable rent.

The PHA may complete rent reasonableness for multifamily properties issuing a "blanket determination" for approving Section 8 contract rents at the multifamily property. A "blanket determination" rent is made after reviewing the open market rents at the property and those of nearby comparable properties. The PHA reserves the right to make a determination of a reasonable rent utilizing its best judgment under unusual or extraordinary circumstances including, but not limited to, a high vacancy rate; the absence of comparable data; or other factors which may affect the rent of a Section 8 assisted property. Such determinations require the approval of the Director of Section 8 Programs.

F. RENT REASONABLENESS DETERMINATION FOR VOUCHERS

The PHA shall advise the family as to whether the rent is reasonable and shall assist in the negotiation of the rent with the owner if requested by the family. Rents for the Voucher Program are subject to PHA's test of rent reasonableness and must not exceed Certificate Program rents for similar comparable units.

The PHA will conduct rent reasonable tests for the Housing Voucher Program using the same methodology as the Certificate Program.

G. SEPARATE AGREEMENTS

Owners and families may execute agreements for services, appliances, and other items outside those which are provided under the lease if the agreement is in writing and approved by the PHA. If the owner does not provide a range or refrigerator, the PHA may lower the contract rent.

Any appliance, service or other item which is routinely provided to unassisted tenants as part of the lease (such as air conditioning, dishwasher or garage) or is permanently installed in the unit cannot be put under separate agreement and must be included in the lease.

For there to be a separate agreement, the family must have the option of not utilizing the service, appliance or other item.

The PHA is not liable for unpaid charges for items covered by separate agreements and nonpayment of these agreements.

If the family and owner have come to an agreement on the amount of charges for specific items, the charges will be approved if they are reasonable and not a substitute for higher rent.

Copies of all separate agreements must be provided to the PHA.

H. UNIT APPROVAL/DISAPPROVAL

After the PHA has reviewed the Request for Lease Approval and Lease, determined rent reasonableness, conducted an inspection and passed the unit, checked the Certificate/Voucher unit against the Fair Market Rent and found it to be less or approved an Exception Rent, the PHA will approve and process the HAP Contract.

If the PHA determines that the lease cannot be approved for any reason, the landlord and the family will be notified. The PHA will explain the problems to the owner and suggest how they may be corrected.

If the proposed Gross Rent exceeds the FMR, the PHA will discuss with the landlord the possibility of either reducing the Contract Rent or including some or all of the utilities in the Contract Rent or, if the unit is determined to be rent reasonable and exception rent authority is available, the PHA may grant an exception rent.

If the owner accepts the PHA's offer of a revised rent, the PHA will continue processing the Request for Lease Approval and Lease.

If the owner does not agree on the contract rent after the PHA has attempted to negotiate a revised rent, the PHA will inform the family that the lease cannot be approved. The family should continue efforts to locate eligible housing before the Certificate/Voucher expires.

I. HAP CONTRACT EXECUTION

Prior to HAP Contract execution, the PHA will review the family's composition and information about income and allowances. If significant changes have occurred, the information will be verified and the Total Tenant Payment will be recalculated in accordance with HUD and PHA policies.

When the lease approval process is completed, the PHA will notify the landlord and the family of the lease approval or disapproval.

If the lease is approved, the PHA will prepare the HAP Contract and Lease Addendum. In preparing the documents, the PHA will compute the Total Tenant Payment, Tenant Rent, Utility Reimbursement (if any), and the Housing Assistance Payment.

When the leasing documents are prepared, the PHA will have the documents executed by the family, owner, and the PHA and send appropriate copies to each party and retain copies for the file.

Generally, families and owners will be required to come to the PHA's offices to execute the required documents. The documents may also be mailed out for signature with the Housing Assistance Manager's approval in hardship cases.

XIII. OWNER PAYMENT AND UTILITY ALLOWANCE

A. OWNER PAYMENT IN THE CERTIFICATE AND HOUSING VOUCHER PROGRAM

The payment to the landlord is based upon Contract Rent approved by the PHA less the Tenant Rent as determined by the PHA.

The payment to the landlord is called the Housing Assistance Payment.

B. OWNER PAYMENT IN THE VOUCHER PROGRAM

Rents are restricted by the Fair Market Rent or by rent reasonableness in the Voucher Program. The rent amount approved by the PHA impacts the calculation of Housing Assistance Payment provided by the PHA as noted in the Housing Voucher Contract.

The maximum subsidy level for each family is determined by the Payment Standard for the family less 30% of the family's Monthly Adjusted Income. The actual subsidy level could be less if the family is required to pay the Minimum Total Tenant Payment (10% of the family's Monthly Income.)

The Payment Standard to be used in the calculation is based on the Voucher size the family holds.

The Housing Assistance Payment to the Owner is the lesser of:

- the actual Housing Voucher Subsidy described above; or
- the rent to Owner (similar to Contract Rent in the Certificate Program).

Payment Standards are reviewed annually and will be adjusted in accordance with Section XXIV — Payments Standards for the Voucher Program.

C. UTILITY ALLOWANCE

The same Utility Allowance Schedule is used for both Certificates and Vouchers.

If the family pays for some or all utilities, the PHA will provide the family with a utility allowance. The allowances are based on actual rates and average consumption estimates, not on a family's actual energy consumption.

The PHA will review the Utility Allowance Schedule on an annual basis. If a revision is needed, based on methods required by HUD, the Utility Allowance Schedule will be revised.

Approved utility allowance schedule(s) will be given to families along with their Certificate of Family Participation or Housing Voucher. The same schedule(s) will be used by the PHA to record the actual allowance for the unit the family selects if there are tenant-paid utilities.

Where families provide their own range and refrigerator, the PHA will establish an allowance adequate for the family to purchase or rent a range or refrigerator, even if the family already owns either appliance.

Allowances for ranges and refrigerators will be based on the lesser of the cost of leasing or purchasing the appropriate appliance, based on factors provided by HUD.

D. MAKING PAYMENTS TO OWNERS

Once the HAP Contract is executed, the PHA begins processing payments to the landlord.

The effective date and the amount of the HAP payment is communicated in written form to the staff person responsible for maintaining the HAP Register.

A HAP Register will be used as a basis for monitoring the accuracy and timeliness of payments.

The PHA maintains a Tenant Directory by ACC for monthly changes to be made. The PHA is automated and the changes are made automatically to the HAP Register for the following month.

Checks are disbursed by the PHA to the owner each month.

E. UTILITY REIMBURSEMENT PAYMENTS

Where the Utility Allowance exceeds the Total Tenant Payment of the family, the PHA will provide a Utility Reimbursement Payment to the family each month.

The check will be made out directly to the tenant.

XIV. ANNUAL ACTIVITIES

There are three activities the PHA conducts on an annual basis. These activities will be coordinated whenever possible:

- Annual Re-certification of Income;
- Annual HQS Inspection;
- Contract Rent Increase Requested by Owner.

The PHA maintains a listing of units under contract by month to ensure systematic reviews of contract rent, allowances for utilities and other services, and housing quality in accordance with the requirement for annual reexamination. Monetary changes are made automatically to the HAP Register to affect a change at the desired effective date.

A. ANNUAL RECERTIFICATION

Families will be requested to provide information on income, assets, allowances and deductions, and family composition at least annually.

Annual recertifications for mid-month move-ins (e.g. September 15th) will be conducted no later than the following year by the first of the move-in month (e.g. September 1st).

When families move to another dwelling unit, a recertification will be scheduled unless the last recertification was completed less than 90 days prior to lease and contract termination.

1. Reexamination Notice to the Family:

The PHA will maintain a reexamination tracking system and at least 90–120 days in advance of the scheduled annual reexamination effective date, the head of household will be notified by mail that s/he is required to attend a reexamination interview on a specified date (or rearrange a date in advance if the scheduled date is unacceptable.)

2. Verification of Information Provided:

The policies and procedures outlined in Section VIII, Verification Procedures, will be used by the staff for annual recertifications.

3. Changes in Tenant Rent:

When the information is analyzed, all necessary documents are prepared and signed by the tenant, and all other requirements have been met, the PHA will recalculate the tenant's portion of rent.

The PHA will notify both the owner and tenant of its determination and of the new rent to be paid by the tenant (and new Housing Assistance Payment to be paid by the PHA) if applicable.

If there is a rent increase, the new rent portion will go into effect following a full thirty day notice prior to the first of the month. (If there has been misrepresentation by the tenant, or if the tenant caused a delay in the reexamination processing, there may be an increase in rent made retroactively.)

If there is a rent decrease, it will be effective on the scheduled effective reexamination date (unless the family has caused a delay in reexamination processing.)

B. ANNUAL HQS INSPECTION

General Policy:

The PHA will conduct an inspection using the Housing Quality Standards (and other standards approved in this Administrative Plan) at least annually.

Annual inspections for mid-month move-ins (e.g. September 15th) will be conducted no later than the following year by the first of the move-in month (e.g. September 1st.)

HQS fails must be corrected by the owner if the fail items were caused by normal wear and tear. HQS fails caused by the tenant or family members or guests of the tenant must also be corrected by the PHA's inspection deadline.

C. RENT INCREASES BY OWNER

1. Certificate Program.

Certificate Program owners must request a rent increase in writing. Rent increases to owners under the Certificate Program are to be effective on or after the anniversary date of the HAP Contract.

Rent increases for mid-month move-ins (e.g. September 15th) will be granted no earlier than a year from the first of the month following move-in (e.g. October 1st.)

The PHA will determine on a case-by-case basis that the approved rent:

- Does not exceed rents charged by the owner for comparable unassisted units in the private market;
- Is reasonable in relation to rents charged by other owners for comparable units in the private market;
- Rent increase requests do not exceed the applicable Annual Adjustment Factor as published by HUD.

Documentation on comparable unassisted rents will be maintained in Rent Reasonableness Records.

If the owner rejects the PHA's proposed rent after the first term of the lease, the PHA shall advise the owner the option of offering the tenant a new lease. The PHA and tenant must approve the new lease.

2. Voucher Program.

Owners may not request a rent increase in the Voucher Program prior to the expiration of the first term of the lease. Rent increases may be effective with a 60 day notice to the family and a copy to the PHA. All rent increases are subject to PHA rent reasonableness standards.

XV. INTERIM RECERTIFICATIONS

A. CHANGES TO REPORT

1. Certificate Program.

In the Certificate Program, the Total Tenant Payment and Tenant Rent will remain in effect for the period between regularly scheduled reexaminations except:

- The tenant may report any of the following changes which would result in a decrease in the tenant's rent:
 - A. Decrease in income; or
 - B. Increase in allowances or deductions.

Decreases in the tenant portion of the rent will be effective the first day of the month following the month in which the change occurs if reported in a timely manner.

The PHA does not conduct interim recertifications which could result in an increase of rent until the family's scheduled annual recertification unless the family:

- Reports zero income at an interim or annual recertification;
- Has an annual income that cannot be projected with any reasonable degree of accuracy;
- Has submitted false, incomplete, or inaccurate information at their last recertification;
- Has been paying an incorrect tenant rent as a result of PHA error. (The family will not be subject to a retroactive charge for overpayments by the PHA).

2. Voucher Program.

The tenant shall be required to report under the same circumstances as the Certificate Program described above.

However, the Total Tenant Payment or Tenant Rent may be changed in addition to the reasons listed above if there is a change in the Rent to Owner which causes a change in Total Tenant Payment or Tenant Rent.

B. FORMS USED FOR INTERIMS

The PHA will only verify those changes that the family reports.

A HAP Amendment Form will be sent to the owner and tenant because the family's Total Tenant Payment has changed.

C. TIMELY REPORTING

1. Standard for Timely Reporting of Changes.

The standard for reporting changes for interims (other than changes in family composition which are described below) in a timely manner is for the family to report the change by the end of the month in which the change occurs.

However, there will be situations where, due to holidays and weekends, the tenant will not be able to report the change by the end of month in which the change occurs. Therefore, if the change occurs during the last 5 calendar days of the month, and the change is reported within the first 5 calendar days of the next month, it will be considered timely reporting.

The staff will note the file when the tenant calls to report to the change. If the tenant calls and the file was noted within the time frames specified, it will be considered timely reporting. This will be followed up with a written confirmation of the interview appointment date.

In this case, any decrease can be made retroactive to the first of the month following the change. The tenant will be given the customary 30 days notice (prior to the first of the month) for an increase.

The tenant will be required to sign a third party verification form, unless third party verification is impossible to obtain. The tenant will also be required to bring any documents in to prove the change. If the tenant does not bring the required information with them to the interview, they will be required to return with the documentation within 10 calendar days. In addition, third party verification is sent out, verifying the change.

If the tenant does not return within the 10 calendar days, the Total Tenant Payment is calculated when either the third party verification or the document is received, and it will be considered "untimely reporting" by the tenant.

If the tenant does not come in within the 10 day grace period identified, the decrease cannot be retroactive to the first of the month.

2. Procedures When the Change is Reported in a Timely Manner.

The Housing Authority will notify the family and the owner of any change in the Housing Assistance Payment to be effective according to the following:

- The family will be given a 30 day notice prior to the first of the month for a rent increase. Increases in the tenant rent are to be made effective upon thirty days notice, prior to the first of the month, so that the change is always effective on the first of the month, rather than some date within the month.
- Decreases in the tenant rent are to be made effective the first of the month following the change. However, no downward rent adjustments are to be processed until all the facts have been verified, even if a retroactive adjustment results.

The change may be based on the documentation the tenant brought with them to the interview, followed up by the third party verification sent to the third party. Verbal confirmation by the tenant will not be acceptable.

If the tenant does not bring the information with them, they will be requested to return with the documentation within 10 calendar days or it will be considered untimely reporting.

3. Procedures when the Change Is Not Reported in a Timely Manner.

If the family does not report the change by the end of the month in which the change occurred, or within the 10 day grace period specified in Section C1, the family will be determined to have caused an unreasonable delay in the interim reexamination processing.

- **Increased Tenant Rent:** The change will be effective retroactive to the date it would have been effective, had it been reported on a timely basis.
- **Decreased Tenant Rent:** The change will be effective on the first of the month following completion of processing by the PHA (not on a retroactive basis.)

Deviation from normal effective dates is justified because of the tenant's failure to supply the required report.

The calculation methodology is the same even if there was a change three or four years ago that the tenant did not report and should have. The change is retroactive to the original date even if they have been changing jobs every six months and have not reported their job income at reexamination, as long as the family's change was made after the family became a participant. A history must be established to determine how much money the tenant owes the PHA.

4. Procedures When the Change Is Not Processed by the PHA in a Timely Manner.

"Processed in a timely manner" means that the change is effective on the date it would have been effective when the tenant reported the change in a timely manner.

If the change cannot be made effective on those dates, using the required notice periods, the change is not processed by the PHA in a timely manner.

If changes are not processed by the PHA staff in a timely manner, an increase will be effective with the required thirty days notice prior to the first of the month after completion of the processing by the PHA.

If the change resulted in a decrease, an overpayment by the tenant will be calculated retroactively to the date it should have been effective and a check will be sent to the tenant.

5. Timing of Next Annual Recertification.

In the event there is an interim adjustment completed, the next regular reexamination will be scheduled within a year from the last scheduled effective date of the annual reexamination of family contribution.

6. Changes in Family Composition.

All changes in family composition must be reported at the family's next annual recertification or when the family gives notice to move the PHA.

If the family has failed to report the change of family composition in a timely manner, any difference in the allowable subsidy due to a reduced Certificate size eligibility based on

the Gross Rent for their current sized unit less the FMR for the Certificate size to which they were entitled, using the FMR schedule currently in effect, shall be charged to the remaining family retroactively from the first of the month following the change and a new Certificate of appropriate size issued immediately, if available, unless the family is in the initial term of the lease.

The following shows how subsidy is calculated if a family fails to report a change in a timely manner from a 3BR Certificate to a 1BR Certificate and the family had been living in a 3BR unit:

3BR Contract Rent
+ 3BR Utility Allowance
- 1BR FMR
= Overpaid subsidy

Families holding a Housing Voucher will only be penalized if they do not report their change in family composition from one annual recertification to another or if they move to another unit. This is because their Payment Standard does not change until an annual recertification or they move to another unit.

If a family does not report the change at their annual recertification or when requested provide information for an interim recertification, the same kind of overpaid subsidy will be calculated by taking the larger size Payment Standard and subtracting the smaller size Payment Standard to get the overpayment.

For example, if a family had a 3BR Payment Standard and actually qualified for a 1BR Payment Standard at recertification but did not inform the PHA, the calculation would be as follows:

3BR Payment Standard
- 1BR Payment Standard
= Overpaid Subsidy

XVI. TERMINATION AND FAMILY MOVES

A. FAMILY MOVES

The family can decide to move to another unit after the initial 12 months has expired or after obtaining a mutual rescission of the lease from the family's landlord. The PHA will issue the family a new Certificate or Housing Voucher if the family does not owe the PHA money and the family is in compliance with HUD and CMHA Section 8 regulations.

B. FAMILY NOTICE TO MOVE

Families are required to give advanced written notice of their intent to end the lease to their owner in accordance with their lease (not less than 30 days and not greater than 60 days). During the first term, families may not end the lease unless they and the owner mutually agree to end the lease. If the family moves from the unit before the initial term of the lease ends without the owner's and PHA's consent, it will be considered a serious lease violation and may subject the family to termination from the Section 8 Program.

The family must provide a copy of the lease termination notice to the PHA. A family's failure to provide a copy of the lease termination notice to the PHA shall be considered as a violation of Family Obligations and may cause the family to be terminated from the Section 8 Program.

Acceptable lease termination notice to the owner must be done by certified mail. The family will be required to provide the certified mail receipt and a copy of the lease termination notice to the PHA. If the owner does not accept the certified mail receipt, the family will be required to provide the receipt and envelope showing that the attempt was made. A copy of the lease termination notice shall also be given to the PHA.

Failure to follow the above procedures may subject the family to termination from the Section 8 Program.

C. CERTIFICATE/VOUCHER ISSUANCE DETERMINATION FOR SPLIT HOUSEHOLDS

When the household is divided and becomes more than one household (e.g. divorce or legal separation), the PHA must determine who is eligible to participate in the program.

Unless there is mutual consent or a Court stipulated determination, the PHA will make the decision as to which party is able to retain the Certificate or Voucher.

In making this decision, the PHA may consider the following guidelines:

- The desires of the parties involved;
- Custody of the children;
- The individual to whom the Certificate/Voucher was issued, if not jointly;
- The remaining family composition in the unit;
- The possibility of domestic violence.

Documentation to prove these items will be the responsibility of the requesting parties. If documentation is not provided, the PHA reserves the right to issue the Certificate or Voucher to the remaining member of the tenant family.

D. EVICTIONS

In the event the owner desires to terminate the lease, the owner must comply with the conditions of the lease and housing contract. The lease may be terminated by:

- court action pursuant to the Ohio Revised Code using the grounds for eviction cited in the lease;
- a mutual lease rescission executed by the owner and tenant (The form must be approved by the PHA).

Other actions may result in lease termination:

- The owner may terminate a lease at any time after the initial one year period or at the end of any renewal period;
- The owner may choose not to make the repairs to the unit as required by the Housing Quality Standards;
- The unit becomes over-crowded or under-occupied according to Housing Quality Standards and PHA Subsidy Standards.

In the event of a lease termination or the owner obtains an eviction or lease rescission, the family may be issued another Certificate or Voucher to move to another unit unless there are grounds to deny or terminate assistance. Prior to any issuance of a new Certificate or Voucher, the PHA will conduct a recertification pursuant to the PHA's policies.

E. OWNER NOTICE TO VACATE UNIT

Owners may only give tenants notice according to their lease and/or the HUD Lease

Addendum provisions. Owners are required to follow eviction procedures consistent with their housing contract and must comply with federal, State, and local law.

F. FAMILY MISREPRESENTATION

If the family has committed fraud in connection with the Section 8 Program, the PHA may terminate assistance and cancel the contract. If the family has understated income and assets, overstated deductions, and/or has misrepresented family composition, the PHA will make every effort to recover any housing subsidy overpayment made as a result of the family's fraud or program abuse.

G. OWNER MISREPRESENTATION

If an owner has committed fraud or misrepresentation in connection with the Section 8 Program, the PHA may terminate the Contract and review the circumstances and family's involvement to determine if the family is eligible to relocate to another unit with continuation of assistance.

The PHA will make every effort to recover any overpayment made as a result of owner fraud or abuse.

If the owner has committed fraud, the PHA may bar the owner from participation in the program or refuse to enter into any new housing contract. The period of time will be determined by the PHA, depending on the seriousness of the offense.

H. CHANGE IN OWNERSHIP

The PHA must receive a written request by the owner who executed the HAP in order to make changes regarding who is to receive the PHA's rent payment or the address to where the payment should be sent.

The PHA will process a change of ownership only upon the written request of the new owner and only if accompanied by a copy of a Deed or Trust showing the transfer of title and the correct Tax

Identification Number or Social Security Number of the actual owner of the Property. New owners to the Program must properly execute IRS form W-9. The PHA may withhold payment until the correct tax identification number is received. The PHA will request the owner to execute a HAP Contract Transfer Form. A new owner may request a new lease and HAP Contract be executed with the tenant and PHA.

XVII. DENIAL OR TERMINATION OF ASSISTANCE

A. GENERAL POLICY

The PHA may deny or terminate assistance at any time for any of the following reasons:

- Families who have committed fraud or program abuse in any federal housing assistance program as documented by the PHA;
- Families who have violated any of their Family Obligations which include:
 - a. The family must supply any information that the PHA of HUD determines necessary for the administration of the program, including any evidence of citizenship or eligible immigration status.
 - b. The family must supply any information requested by the PHA or HUD for use in regular or interim reexamination of the family's income and family composition in accordance with HUD requirements.
 - c. The family must disclose and verify social security numbers and must sign and submit consent forms for obtaining information in accordance with 24 CFR part 760 and 24 CFR part 813.
 - d. Any information supplied by the family must be true and complete.
 - e. The family is responsible for any HQS breach caused by the family as described in §982.404(b).
 - f. The family must allow the PHA to inspect the unit at reasonable times and after reasonable notice.
 - g. The family must not commit any serious or repeated violation(s) of the lease.
 - h. The family must notify the PHA and owner before the family moves out of the unit, or terminates the lease on notice to the owner. See §982.314(d).
 - i. The family must promptly give the PHA a copy of any owner eviction notice.
 - j. The family must use the assisted unit for residence by the family. The unit must be the family's only residence.
 - k. The composition of the assisted family in the unit must be approved by the PHA. The family must promptly inform the PHA of the birth, adoption, or court-awarded custody of a child. The family must request the PHA's approval to add any other family member as an occupant of the unit.
 - l. The family must promptly notify the PHA if any family member no longer resides in the unit.

- m. If the PHA has given approval, a foster child or a live-in-aide may reside in the unit.
- n. Members of the household may engage in legal profit-making activities in the unit, but only if such activities are incidental to the primary use of the for residence by members of the family.
- o. The family must not sublease or let the unit.
- p. The family must not assign the lease or transfer the unit.
- q. The family must supply any information or certification requested by the PHA to verify that the family is living in the unit, or relating to family absence from the unit, including any PHA requested information or certification on the purposes of family absences. The family must cooperate with the PHA for this purpose. The family must notify the PHA of absence from the unit.
- r. The family must not own or have any interest in the unit.
- s. The family's members must not commit fraud, bribery, or any corrupt or criminal act in connection with the Section 8 Program.
- t. The family's members may not engage in drug-related criminal activity, or violent criminal activity (see §982.553).
- u. An assisted family, or members of the assisted family, may not receive Section 8 tenant-based assistance while receiving another housing subsidy, for the same unit or for a different unit, under any duplicative (as determined by HUD or in accordance with HUD requirements) federal, State or local housing assistance program.

In addition to the above requirements, the PHA may terminate assistance if:

- a. families who refuse to enter into a repayment agreement for funds due the PHA or who are in default of an executed repayment agreement by missing two consecutive payments. For any family in default, the outstanding balance must be paid prior to the issuance of a Certificate or Voucher or execution of a HAP Contract;
- b. families whose Total Tenant Payment is sufficient to pay the full gross rent and/or six months has elapsed since the PHA's last HAP payment was made to the family's landlord;
- c. any family member has been evicted from public housing;
- d. a PHA has ever terminated assistance under the Certificate or Voucher Program for any family member;
- e. the family currently owes rent or other amounts to a housing authority in connection with Section 8 or public housing assistance under the 1937 Act;

- f. the family has not reimbursed any housing authority for amounts paid to an owner under a HAP contract for rent damages to the unit, or other amounts owed by the family under the lease;
- g. failure as FSS program participant to comply without good cause with the FSS contract of participation.
- h. the family has engaged in abusive or violent behavior toward the PHA's personnel.

B. DEFINITIONS AND RELATED POLICIES

Drug-related or Violent Criminal Activity:

Family must not engage in drug-related criminal activity or violent criminal activity, including criminal activity by any Family member.

Drug-related criminal activity means:

- a. The illegal manufacture, sale or distribution, or the possession with intent to manufacture, sell or distribute, a controlled substance (as defined in the Controlled Substance Act);
- b. The illegal use or possession (other than with intent to manufacture, sell or distribute), of a controlled substance, except that such felonious use or possession must have occurred within one year before the date that the PHA provides notice to an applicant or participant of the PHA's determination to deny admission or terminate assistance.
- c. Drug related criminal activity does not include the use or possession, if the Family member can demonstrate that s/he:
- d. has an addiction to a controlled substance, has a record of such an impairment, or is regarded as having such an impairment; and,
- e. has recovered or is recovering from such addiction and does not currently use or possess controlled substances.

Violent criminal activity includes any felonious criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force against the person or property of another.

Evidence of Criminal Activity:

In determining whether to deny or terminate assistance based on drug- related criminal activity or violent criminal activity, the PHA may deny or terminate assistance when

information from a reliable source clearly indicates that a family member has engaged in such activity regardless of whether the family member has been arrested or convicted.

As a measure to determine whether the person has violated this family obligation, one of the following situations must be present:

- there has been an arrest for engaging in drug-related criminal activity or violent criminal activity (as defined above), including criminal activity by any Family member, which resulted in a conviction within the last 60 months;
- the family has been evicted from subsidized housing (including but not limited to Public Housing and housing subsidized under the Section 8 Certificate, Voucher or Moderate Rehabilitation programs) for engaging in drug-related criminal activity or violent criminal activity (as defined above), including criminal activity by any Family member;
- The PHA has acquired/been presented with information that the family, including any family member, is engaging in drug-related criminal activity or violent criminal activity (as defined above).

C. \$0 ASSISTANCE TENANTS

\$0 assistance tenants may remain on the program for 6 months from the effective date they went to \$0 assistance.

If the family's Total Tenant Payment is sufficient to pay the full gross rent and 6 months has elapsed since the PHA's last HAP payment was made, the family's assistance is terminated.

There are no expiration dates on leases. There is no new lease and contract at reexamination time unless the owner offers the tenant a new lease.

However, if the owner requests a rent increase during this period and the rent increase would cause the PHA to resume HAP payments, or if at reexamination time, the tenant had a loss of income and there would be a HAP payment, the payments would be resumed.

If payments are resumed, there would be an interim adjustment and an Amendment would be sent out, listing the new amounts.

When the 6 months has elapsed, the owner will be notified of the termination of the HAP Contract, in accordance with the HAP Contract.

The tenant will be notified of their rights to remain on the program at \$0 assistance for 6 months.

In the event that the tenant wants to move to another unit during this period, the PHA would not execute a new HAP Contract for the new unit at \$0 assistance. If there would be assistance (because of a higher rent, for example), the PHA may execute a new HAP Contract.

D. NOTICE OF TERMINATION

For any reason where the PHA decides to terminate assistance to the family, the PHA must give notice to the family and the owner. A 30 day written termination notice which will include the following information:

- the reasons for the termination;
- the effective date of the termination;
- the household's right to request an informal hearing;
- the family's responsibility to pay the full rent to the owner if they remain in the unit

XVIII. MOVE-OUT INSPECTIONS

Move-out inspections are done after the tenant vacates the unit and should not be done while the tenant is still cleaning the unit.

The owner or the owner's representative will be required to attend the move-out inspection. The owner will be notified as to when the inspection will take place. The PHA will notify the tenant of the inspection date.

The PHA will conduct a move-out inspection to substantiate the damage claim upon the owner's request. The owner will not be allowed to file a damage claim unless move-out inspection is requested and completed prior to work being done.

The PHA will analyze the claim to see whether the costs are reasonable, based on cost guidelines, receipts, and the judgement of the staff person responsible for making the determination.

The owner must request a move-out inspection within 5 days after the tenant has vacated the unit in order to submit a claim. In the event that the PHA cannot schedule a timely inspection of the unit, the PHA's Inspections Coordinator may give the owner permission to submit the claim with pictures of the unit, to substantiate the damage claim.

If the tenant elects to remain in the unit at the end of HAP contract and Lease, the PHA will not be obligated to pay unpaid rent and damages if the tenant does not vacate the unit within 60 days of the termination date of the HAP contract.

The above policies do not apply to contracts executed under the new rules that were made effective on October 2, 1995. The PHA will continue to process damage claims for contracts that have been executed under the previous HUD regulations.

XIX. OWNER CLAIMS

As part of the HAP Contract, owners can make "special claims" for damages, unpaid rent, and vacancy loss (vacancy loss cannot be claimed in the Voucher Program) after the tenant has vacated the unit.

Owner claims for payment for unpaid rent, damages or vacancy loss under the Section 8 Existing Program are reviewed for accuracy and completeness and compared with internal records on the unit such as initial inspection report and on-site move-out inspection (or pictures if a move-out inspection cannot be scheduled before the next tenant moves in, with PHA permission.)

Although the PHA will make payments on behalf of the tenant, the tenant is ultimately responsible for any damages, unpaid rent, or vacancy loss paid by the PHA to the owner and will be required to repay the PHA to remain eligible for the Section 8 Program.

HAP Contracts executed under new HUD regulations do not authorized PHA payments for unpaid rent or damages at the end of the lease.

A. UNPAID RENT

Unpaid rent is the tenant's portion of rent due and payable while the tenant is under the lease. It does not include any rent beyond the termination period of the HAP Contract.

Because the owner has other remedies under the lease and contract to remedy the uncollected rent, the PHA will pay unpaid rent claims for no more than two months' back rent prior to the vacate date or termination of HAP Contract.

B. DAMAGES

Claims for damages must be supported by the actual bills for repairs and materials and labor and a copy of the canceled checks showing payment if the repair has been made. Estimates for repairs or replacement of items are acceptable if repairs have not been made. Bills from individuals providing labor must include their name, address and phone number.

Eligible items to be included on the damage claim must have been a tenant obligation under the lease and must have been clearly identified as a tenant obligation under the lease. Separate agreements are not considered to be included as a tenant obligation under the lease.

The PHA will develop a list of reasonable costs and charges for items routinely included on damage claims. This list will be used as a guide in determining the reasonableness of damage claims.

C. VACANCY LOSS - (CERTIFICATE PROGRAM ONLY)

In order for the owner to claim vacancy loss, the tenant must have moved in violation of the lease.

To claim vacancy loss, the landlord must meet the minimum requirements of having notified the PHA of the vacancy and must have advertised the vacancy by placing an ad in the local newspaper offering the unit "For Lease" and specifying "Section 8 Families Welcome." A copy of the advertisement and the dates advertised at the time of submission of damage/vacancy loss claim will be submitted to the PHA. Posting the vacancy with the PHA may be accepted in lieu of the advertisement. Vacancy Loss is applicable to Certificate Program only.

No eligible tenant may have been denied housing except for good cause in order for an owner to claim vacancy loss.

D. PROCESSING CLAIMS

When the PHA receives a claim for unpaid rent, damages, or vacancy loss, it will be reviewed by the PHA. The tenant should be notified by the owner of the move-out inspection so that they may provide input as to their responsibility for damages.

If the owner does not notify the tenant of the move-out inspection date, the tenant should contact the PHA upon move-out to determine the date. Nevertheless, the tenant will be responsible to the PHA for claims paid on their behalf when it comes to future assistance.

Failure on the part of the tenant to attend the inspection will necessitate the PHA making the decision based on the evidence submitted and the inspection reports.

Any amount owed by the tenant to the owner for unpaid rent or damages will first be deducted from the security deposit which an owner could have collected under the program rules. The balance will be calculated using HUD methodology.

Proof or verification that the owner has attempted to collect any monies owed directly from the tenant must be submitted with the damage/vacancy loss claims. Landlords must mail

the request for payment by Certified Mail/Return Receipt Requested to tenant's last known address with a request for the Post Office to "Please Forward."

Costs of filing eviction and forcible detainer to remove tenant from premises when they have violated their lease shall not be considered a "damage" to said unit and must not be included in the listing of the damages for reimbursement.

All unpaid rent, damage, and vacancy loss claims must be submitted within 90 days of the date the tenant vacated the unit. If the owner has filed a claim for judgement for damages and unpaid rent, the PHA will place a hold on the claim until the owner provides a copy of the court's decision to the PHA. The PHA may affirm or modify the court award, if any, depending upon the information about the claim on file with the PHA.

If the Security Deposit is insufficient to reimburse the owner for the unpaid tenant rent or other amounts which the family owes under the lease, the owner may request reimbursement from the PHA up to the limits for the Certificate or Voucher program.

Once the payment is made to the owner, the PHA will inform the family of the payment and of the family's responsibility to reimburse the PHA for payment made on their behalf.

The family will be informed of the possible effect on transfer rights and future program participation if payment is not made within the time specified by the PHA.

The PHA may enter into a Repayment Agreement with the participant for repayment of the amount owed, rather than request total payment, depending on the family's past history of Repayment Agreements with the PHA.

XX. COMPLAINTS AND APPEALS BY PARTICIPANTS AND OWNERS

A. COMPLAINTS

The PHA will investigate and respond promptly to complaints by families or owners. The PHA may require that complaints other than HQS violations be put in writing to the PHA. Each complaint regarding physical condition of the units may be reported by phone to the Inspection section. Anonymous complaints are checked whenever possible.

B. APPEALS BY OWNERS

Owners may appeal the PHA's decision by first attempting to meet with the Section 8 Coordinator who made the initial decision. If the owner is not satisfied with the Coordinator's decision, the owner may schedule a meeting with the Director and Assistant Director of Section 8 Programs to resolve the matter. If the owner remains unsatisfied with the Director's or Assistant Director's decision, the owner may file a written request for a final review of the PHA's decision by the Executive Director.

C. APPEALS BY PARTICIPANTS

All Section 8 participants have a right to appeal the PHA's decision(s) which may affect their status as a participant and the type and scope of benefits that are afforded to them under the Section 8 Program. Appeals to certain PHA decisions must be made pursuant to the HUD regulations and the PHA's policies that govern informal hearings. An informal hearing allows a participant an opportunity to present the participant's individual circumstances or personal hardship which could reverse or modify the PHA's initial decision. The informal hearing also affords the hearing officer an opportunity to review the PHA's initial or proposed decision(s) for compliance with HUD regulations and PHA policies. The hearing officer may reverse, modify, or affirm with or without conditions, the PHA's initial or proposed decision as long as the hearing officer's decision is not contrary to HUD regulations or requirements, or otherwise contrary to federal, state, or local law.

The PHA will not be required to provide an informal hearing to a participant family for any of the following:

- discretionary administrative determinations;
- general policy issues or class grievances;
- establishing or reviewing the PHA's utility allowances;
- extending or suspending a term of a Certificate/Voucher;
- approving a unit or owner's lease;

- HQS determinations on a unit;
- HQS occupancy violations because of family size;
- the PHA's contractual rights and remedies with an owner.

All requests for Informal Hearings must be made within 10 calendar days of the date of the notification letter or within 10 calendar days from the PHA's initial administrative action or decision. All requests must be made in writing and must be addressed to the PHA's Director of Section 8 Programs. Requests received after the deadline will not be processed. The PHA accepts no responsibility for lost or delayed mail.

If the participant's request for an Informal Hearing is received by the PHA's deadline, an Informal Hearing will be scheduled and the participant will be sent written confirmation (at the participant's last known address) of the informal hearing's location, time, and date.

If the participant's request for an Informal Hearing is received after the PHA's deadline, the PHA will reject the participant's request for the hearing by sending a rejection letter to the participant. The letter will be sent to the participant's last known address.

The participant must bear the burden of proof for any claim of lost or undelivered mail. The PHA will maintain all copies of correspondence in the participant's file.

The Informal Hearing shall be conducted by a Hearing Officer who will be neither the person who made or approved the decision under review or a subordinate of such person. Hearing Officers may be PHA employees appointed by the PHA's Executive Director.

The Hearing Officer shall regulate the conduct of the hearing in accordance with the PHA's hearing procedures. The hearing shall be conducted informally by the Hearing Officer. Oral or documentary evidence pertinent to the facts and issues raised by the parties may be received without regard to admissibility under the rules of evidence applicable to judicial hearings. The Hearing Officer shall require the PHA, the participant, counsel, and all other participants and spectators to conduct themselves in an orderly fashion. Failure to comply with the directions of the Hearing Officer to obtain order may result in the exclusion from the proceedings or in a decision adverse to the interests of the disorderly party and granting relief or denial of the relief sought.

The PHA will provide reasonable accommodation for a person with disabilities in order to participate in the hearing. The PHA reserves the right to decide the type and scope of accommodation.

The informal hearing may be recorded and/or transcribed at the sole expense of the party who has arranged for the service.

At the hearing, the participant must first make a showing of an entitlement to the relief sought. Thereafter, the PHA must sustain the burden of justifying the PHA's action or failure to act against which the complaint is directed.

The participant shall be afforded a fair "due process" hearing which shall include:

- the right to be represented by counsel or other representative;
- the opportunity for the participant to examine before the Informal Hearing any PHA documents that are directly relevant to the hearing. The participant may be allowed to copy any such document at their own expense. If the PHA does not allow access to a particular document, the PHA may not rely on the document at the hearing;
- the right to a private hearing unless the participant requests a public hearing;
- the right to present evidence and arguments in support of the participant's complaint to controvert evidence relied upon by the PHA and to confront and cross-examine all witnesses upon whose testimony or information the PHA relies upon to support its decision;
- a decision based solely and exclusively upon the facts presented at the hearing.

The participant will also be advised that the PHA must be given the same opportunity to examine before the informal hearing any participant documents that are relevant to the hearing. The participant must allow the PHA the opportunity to copy any document at the PHA's expense. If the participant fails or refuses to allow the PHA to examine the requested documents, the participant may not rely upon the document(s) at the hearing.

If the participant or the PHA fails to show at the scheduled hearing, the Hearing Officer may make a decision to postpone the hearing for five business days (excluding holidays and weekends) or make a determination that the party has waived their right to a hearing.

The participant and the PHA shall be notified of the Hearing Officer's determination; provided that a determination shall not constitute a waiver of any right the participant may have to contest the PHA's disposition of the Informal Hearing in a court of law.

D. DECISION OF THE HEARING OFFICER

The Hearing Officer shall prepare and issue a written statement on the participant's appeal within 15 calendar days after the hearing. The decision must briefly state the reasons for the decision and must be based upon the preponderance of evidence presented at the hearing. A copy of the hearing decision will promptly furnished to the participant.

The PHA is not bound by the Hearing Officer's decision when:

- the PHA is not required to provide an opportunity for an informal hearing, or exceeds the authority of the person conducting the hearing under the PHA's informal hearing procedures;
- it is contrary to HUD regulations or requirements, or otherwise contrary to federal, state, or local law.

If the PHA determines that it is not bound by an informal hearing decision, the PHA will promptly notify the participant of the determination and of the reasons for the determination.

Nothing in this section shall constitute a waiver of, nor affect in any way, the rights of the participant to a trial or judicial review in any court proceedings which may be brought in the matter at a later time.

XXI. MISSED APPOINTMENTS FOR PARTICIPANTS

A. GENERAL POLICIES

A family who fails to keep appointments at the PHA's offices or at the tenant's unit within the time frame specified in this Plan, without notifying the PHA in advance, may be sent a notice of termination of assistance. Grounds for termination shall be the family's refusal or inability to supply such certification, release, information or documentation, as the PHA or HUD determines to be necessary in the following situations:

- Visiting PHA's offices to provide verification information;
- Certificate or Voucher Briefing;
- Lease signing and Briefing;
- Housing Quality Inspections;
- Annual Recertification Activities;
- Interim Reporting Requirements;
- Quality-Control Appointments/Inspections;
- Fraud or Program Abuse Investigations.

B. APPOINTMENT AT THE PHA'S OFFICE

The PHA sends advance written notice to the family to meet with PHA Section 8 staff to initiate annual or interim recertification procedures. If the tenant fails to show for the first appointment, a second appointment is scheduled with written notice of the second appointment mailed to the family. If the family fails to show for the second appointment, the PHA shall send a proposed notice of termination of housing assistance to the family. The proposed termination shall provide the family an opportunity for an informal hearing before final PHA action.

If a family notifies the PHA that they are unable to keep either the first or the second review appointment, a third appointment may be scheduled at the discretion of the PHA if the PHA determines that the family had a valid excuse for missing the appointment(s). No more than three appointments may be granted to initiate activities listed in the General Policies of this Section.

C. NEED-MORE APPOINTMENTS OR DOCUMENTS

At the family's initial appointment, the PHA may require the family to provide additional documents or certification in order to complete the recertification process. The PHA will schedule a "need-more" appointment with the family to enable the family to give the

requested items directly to the Section 8 caseworker. This procedure enables the caseworker to complete the recertification interview process. The caseworker may also request that the family return or mail the additional needed items to the PHA's offices in order to conclude the recertification process.

The deadline for receiving required documents will be given to the family. Any additional items needed by the PHA will be requested in writing and noted in the tenant's file.

The PHA will give a family no more than two opportunities to provide the required additional information in order to complete the recertification process. The Family's refusal or inability to provide the requested information within specified time frames shall be grounds for termination of housing assistance. Prior to any final action by the PHA, the family will be offered an opportunity for an informal hearing.

D. INSPECTIONS

See Section XI(I) of this Administrative Plan.

XXII REPAYMENT AGREEMENTS

Repayment Agreements are executed with families who must reimburse the PHA for overpaid HAP subsidy due to unreported income and assets, late reporting of income changes, incorrect or incomplete information about family composition, or when the PHA makes a damage and/or vacancy loss payment to the family's previous landlord.

No family may have more than one repayment agreement in effect at any time for funds due the PHA, nor will there be any consolidation of any debts owed to the PHA. Each occurrence must be treated separately.

If the PHA enters into a Repayment Agreement with the family, the terms of the Repayment Agreement will be as follows:

AMOUNT DUE	INITIAL PAYMENT*	MAX TERM
\$500 or less	50% due	6 months
\$501 - 1000	40% due	12 months
\$1001 - 2,500	33% due	18 months
\$2,501 or more	20% due	24 months

* Due at the execution of the Repayment Agreement

Whether a family will be allowed to enter into a Repayment Agreement with the PHA will be at the sole discretion of the PHA. If the PHA has determined that the family committed willful and intentional fraud, the PHA may require the family to repay the entire amount in full as a condition to continue to receive Section 8 assistance. The PHA may terminate assistance if the family refuses to enter into a Repayment Agreement.

Families who are in default of an executed Repayment Agreement by missing two consecutive payments or who are currently behind by two payments must pay their outstanding balance upon notice by the PHA. The PHA may terminate assistance if the family breaches the Repayment Agreement.

Prior to any final termination, the PHA will offer the family an opportunity to request an informal hearing.

XXIII. MONITORING PROGRAM PERFORMANCE

Monthly reports are maintained and monitored for reviewing the waiting list, the outstanding Certificates and Vouchers, and the HAP Register to assure achievement of the outreach goal and the leasing schedule.

Special reports to monitor processing and performance indicators are created and distributed to the managers and staff.

Quality control file audits are conducted by managers on ten percent of the units under contract.

Quality control inspection audits are conducted by managers on five percent of the units under contract.

Additional audits are performed to check performance indicators.

XXIV. PAYMENT STANDARDS FOR THE VOUCHER PROGRAM

A. PAYMENT STANDARDS

The Payment Standard for the Voucher Program will never be less than 90 percent or more than 120 percent of the current Fair Market Rent for units located in Franklin County.

Higher Payment Standards may be adopted for units located suburban communities within the Fair Market Rent area if approved by HUD and the PHA's Board of Commissioners.

B. AFFORDABILITY ADJUSTMENTS

The PHA will review the Payment Standard annually to determine whether an affordability adjustment should be made. Any adjustments will be made in accordance with HUD regulations.

XXV. CHARGES AGAINST THE SECTION 8 ADMINISTRATIVE FEE RESERVE

Periodically, it is necessary for the PHA to make charges against the Section 8 Administrative Fee Reserve to meet unseen or extraordinary expenditures for maintenance, equipment, or services for housing programs that are administered by the PHA.

The PHA's Board of Commissioners have authorized the PHA's Executive Director to charge up to \$25,000 against the Section 8 Administrative Fee Reserve for any single item designated for maintenance, equipment, or services for any PHA administered housing program.

Any single item exceeding \$25,000 will require prior Board of Commissioner approval before any charge is made against the Section 8 Administrative Fee Reserve.

GLOSSARY OF TERMS IN SUBSIDIZED HOUSING

ADJUSTED INCOME. Annual income, less allowable HUD deductions.

ANNUAL CONTRIBUTIONS CONTRACT (ACC). A written agreement between HUD and a PHA to provide annual contributions to cover housing assistance payments and other expenses pursuant to the Act. If there is a State Agency administering the Section 8 Program, for example, there is usually an ACC between the State Agency and HUD.

ANNUAL INCOME. The anticipated total annual income of an eligible family from all sources for the 12-month period following the date of determination of income, computed in accordance with the regulations.

ANNUAL INCOME AFTER ALLOWANCES. The Annual Income (described above) less the HUD-approved allowances.

ASSETS. (See Net Family Assets.)

ASSISTED TENANT. A tenant who pays less than the market rent as defined in the regulations. Includes tenants receiving rent supplement, Rental Assistance Payments, or Section 8 assistance and all other 236 and BMIR tenants, except those paying the 236 market rent or 120% of the BMIR rent, respectively.

CERTIFICATE OF FAMILY PARTICIPATION. A Certificate issued by the PHA under the Section 8 Existing Program, declaring a family to be eligible for participation in this program and stating the terms and conditions for such participation.

CHILD CARE EXPENSES. Amounts paid by the family for the care of minors under 13 years of age where such care is necessary to enable a family member to be employed or for an adult to further their education.

CONTRACT. (See Housing Assistance Payments Contract.)

CONTRACT RENT. In the Section 8 Certificate Program, Contract Rent is the total rent paid to the owner, including the tenant payment and the HAP payment from the PHA.

DEPENDENT. A member of the family household (excluding foster children) other than the family head or spouse, who is under 18 years of age or is a Disabled Person or Handicapped Person, or is a full-time student 18 years of age or over.

DISABLED PERSON. "Disabled person" means a person who is under a disability as defined in Section 223 of the Social Security Act (42 U.S.C. 423) or in Section 42 U.S.C. 6001(7).

DISPLACED PERSON. "Displaced person" means a person displaced by governmental action or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal Disaster Relief laws.

ELDERLY HOUSEHOLD. A family whose head or spouse or whose sole member is at least 62 years of age or a disabled person as defined in this section or a handicapped person as defined in this section or may include 2 or more elderly, disabled or handicapped persons living together or 1 or more such persons living with another person who is determined to be essential to his or her care and well being.

ELDERLY PERSON. One who is at least 62 years old.

ELIGIBILITY INCOME. May 10, 1984, regulations deleted Eligibility Income, per se, because Annual Income is now for eligibility determination to compare to income limits.

ELIGIBLE FAMILY (Family). A family is defined by the PHA in the administrative Plan, which is approved by HUD.

EXCESS MEDICAL EXPENSES. Any medical expenses incurred by elderly families only in excess of 3% of Annual Income which are not reimbursable from any other source.

FAIR MARKET RENT. The rent limit published in the Federal Register for Section 8 Existing which includes utilities (except telephone) and ranges and refrigerators. It is used as a standard to obtain privately owned, existing, decent, safe and sanitary rental housing of modest (non-luxury) nature with suitable amenities. Separate FMRs are established for dwelling units of varying sizes (number of bedrooms) and types. It is used as a maximum for Gross Rent in the Certificate Program (without an exception rent.) In the Voucher Program, it is used as a cap for the Payment Standard, used in the ACC calculation of subsidy dollars, and is used to calculate the administrative fee.

FAMILY. The applicant must qualify as a Family. A Family consists of:

1. Two or more persons related by blood, marriage or operation of law or who will live regularly together in the same dwelling unit, and whose income and resources are available to meet the family's needs or a single who qualifies

under the HUD regulations. An expectant mother with no other children will qualify for assistance as a family. She will be listed on the waiting list and qualifies for admission into housing unless she aborts or miscarries prior to admission. Once she is admitted as a single pregnant woman, she will be considered the remaining member of the tenant family if she aborts or miscarries.

2. An elderly household whose head or spouse meets the following definition (unless otherwise approved by HUD, such as for Rental Rehabilitation Program.) The head, spouse, or co-tenant must be:
 - 62 years of age, or;
 - Handicapped with a physical impairment which is expected to be of long continued and indefinite duration, which substantially impedes but does not prohibit his ability to live independently, and is of such nature that such ability could be improved by more suitable housing conditions, or;
 - Disabled within the meaning of Section 223 of the Social Security Act or Section 102 (7) or 6001(7) of the Developmentally Disabled Act, or;
 - Displaced by governmental action or a person whose dwelling has been extensively damaged or destroyed as a result of a declared disaster or otherwise formally recognized under federal disaster relief laws. Governmental action is defined as Federal, State, or local government, or;
 - Remaining member of a tenant family.

FAMILY OF VETERAN OR SERVICEPERSON. A family is a "family of a veteran or servicemember" when:

1. The veteran or servicemember (a) is either the head of household or is related to the head of the household; or (b) is deceased and was related to the head of the household, and was a family member at the time of death.
2. The veteran or servicemember, unless deceased, is living with the family or is only temporarily absent unless s/he was (a) formerly the head of the household and is permanently absent because of hospitalization, separation, or desertion, or is divorced; provided, the family contains one or more persons for whose support s/he is legally responsible and the spouse has not remarried; or (b) not the head of the household but is permanently hospitalized; provided, that he was a family member at the time of hospitalization and there remain in the family at least two related persons.

FOSTER CHILD CARE PAYMENT. Payment to eligible households by state, local, or private agencies appointed by the State, to administer payments for the care of foster children.

FULL-TIME STUDENT. A person who is carrying a subject load that is considered full time for day students under the standards and practices of the educational institution attended. An educational institution includes a vocational school with a diploma or certificate program, as well as an institution offering a college degree.

GROSS FAMILY CONTRIBUTION. Changed to Total Tenant Payment.

GROSS RENT. The sum of the contract rent and the utility allowance. If there is no utility allowance, contract rent equals gross rent.

HANDICAP ASSISTANCE. Anticipated costs for care attendants and auxiliary apparatus for handicapped or disabled family members which enable a family member (including the handicapped family member) to work.

HANDICAPPED PERSON. A person having a physical or mental impairment which:

1. is expected to be of long-continued and indefinite duration;
2. substantially impedes his or her ability to live independently; and
3. is of such a nature that such ability could be improved by more suitable housing conditions.

HEAD OF HOUSEHOLD. The head of household is the person who assumes legal responsibility for the household and is listed on the application as head.

HOUSING ASSISTANCE PAYMENT. The payment made by the PHA to the owner of a unit under lease by an eligible family, as provided in the HAP Contract. The payment is the difference between the Contract Rent (Rent to Owner in the Voucher Program) and Tenant Rent.

HUD. The Department of Housing and Urban Development or its designee.

IMPUTED ASSET. Asset disposed of for less than fair market value during two years preceding examination or reexamination.

IMPUTED INCOME. HUD passbook rate x total cash value of assets. Calculation when assets exceed \$5,000.

INCOME. Income from all sources of each member of the household as determined in accordance with criteria established by HUD.

INCOME FOR ELIGIBILITY. Annual income.

LANDLORD. This term means either the owner of the property or his or her representative or the managing agent or his representative, as shall be designated by the owner.

LEASE. A written agreement between an owner and an eligible family for the leasing of a housing unit.

LOWER INCOME FAMILY. A family whose income does not exceed 80% of the median income for the area as determined by HUD with adjustments for smaller or larger families, except that HUD may establish income limits higher or lower than 80% on the basis of its findings that such variations are necessary because of the prevailing levels of construction costs or unusually high or low incomes.

MARKET RENT. The rent HUD authorizes the owner in multi-family housing to collect from families ineligible for assistance. For Rent Supplement, Section 202 and Section 8 units, the market rent is the same as the Contract Rent. For BMIR units, market rent varies by whether the project is a rental or cooperative.

MEDICAL EXPENSES. Those total medical expenses, including medical insurance premiums, that are anticipated during the period for which Annual Income is computed, and that are not covered by insurance. A deduction for Elderly Households only.

MINOR. A member of the family household (excluding foster children) other than the family head or spouse who is under 18 years of age.

MONTHLY ADJUSTED INCOME. 1/12 of the Annual Income after Allowances or Adjusted Income.

MONTHLY INCOME. 1/12 of the Annual Income.

NEGATIVE RENT. Now called Utility Reimbursement.

NET FAMILY ASSETS. Value of equity in savings, checking, IRA and Keogh accounts, real property, stocks, bonds, and other forms of capital investment. The value of necessary items of personal property such as furniture and automobiles is excluded from the definition. In cases where a trust fund has been established and the trust is not revokable by, or under the control of, any member of the family or household, the value of the trust fund will not be considered an asset so long as the fund continues to be help in trust.

PAYMENT STANDARD. The amount used to calculate the housing assistance a family will receive in the PHA's Housing Voucher Program.

OWNER. Any persons or entity having the legal right to lease housing.

PARTICIPANT. A family becomes a participant in the PHA's Section 8 Existing Program when there is an effective HAP Contract between the PHA and the owner on behalf of the family.

PUBLIC HOUSING AGENCY (PHA). Any state, county, municipality, or other governmental entity or public body (or agency or instrumentality thereof) which is authorized to engage in or assist in the development of operation of housing for low-income families.

RECERTIFICATION. Sometimes called reexamination. The process of securing documentation to determine the rent the tenant will pay for the next 12 months if there are no additional changes to be reported. There are annual and interim recertifications.

REMAINING MEMBER OF TENANT FAMILY. Person left in assisted housing who may or may not normally qualify for assistance on own circumstances (i.e., widow age 47, not disabled or handicapped).

RENT TO OWNER. This is called Contract Rent in the Certificate Program and Rent to Owner in the Voucher Program. It is the total amount of rent payable to the owner by the family and the PHA per month for an assisted unit.

RESIDENT ASSISTANT. A person who lives in an Independent Group Residence and provides on a daily basis some or all of the necessary services to elderly, handicapped, and disabled individuals receiving Section 8 housing assistance and who is essential to these individuals' care or well being. A Resident Assistant shall not be related by blood, marriage or operation of law to individuals receiving Section 8 assistance nor contribute to a portion of his or her income or resources towards the expenses of these individuals.

SECURITY DEPOSIT. A dollar amount (maximum set according to the regulations) which can be used for unpaid rent or damages to the owner upon termination of the lease.

SERVICEPERSON. A person in the active military or naval service (including the active reserve) of the United States.

SINGLE PERSON. A person living alone or intending to live alone.

SPOUSE. The husband or wife of the head of the household.

SUBSIDIZED PROJECT. A multi-family housing project (with the exception of a project owned by a cooperative housing mortgage corporation or association) which receives the benefit of subsidy in the form of:

1. Below-market interest rates pursuant to Section 221(3)(3) and (5) or interest reduction payments pursuant to Section 236 of the National Housing Act; or
2. Rent supplement payments under Section 101 of the Housing and Urban Development Act of 1965; or
3. Direct loans pursuant to Section 202 of the Housing Act of 1959; or
4. Payments under the Section 23 Housing Assistance Payments Program pursuant to Section 23 of the United States Housing Act of 1937 prior to amendment by the Housing and Community Development Act of 1974;
5. Payments under the Section 8 Housing Assistance Payments Program pursuant to Section 8 of the United States Housing Act after amendment by the Housing and Community Development Act unless the project is owned by a Public Housing Agency; or
6. A Public Housing Project.

TENANT RENT. (Formerly called Net Family contribution). The amount payable monthly by the family as rent to the owner (including a PHA in other programs). Where all utilities (except telephone) and other essential housing services are supplied by the owner, Tenant Rent equals Total Tenant Payment. Where some of all utilities (except telephone) and other essential housing services are not supplied by the owner and the cost thereof is not included in the amount paid as rent to the owner, Tenant Rent equals Total Tenant Payment less the Utility Allowance in the Certificate Program. In the Voucher Program, Tenant Rent is Rent to Owner less HAP.

TOTAL TENANT PAYMENT (TTP). The total amount the HUD rent formula requires the tenant to pay toward rent and utilities.

UNIT. Residential space for the private use of a family. The size of a unit is based on the number of bedrooms contained within the unit and generally ranges from 0 bedrooms to 6 bedrooms.

UTILITIES. Utilities means water, electricity, gas, other heating, refrigeration, cooking fuels, trash collection and sewage services. Telephone service is not included as a utility.

UTILITY ALLOWANCE. The PHA's estimate of the average monthly utility bills (except telephone) for an energy-conscious household. This estimate considers only utilities paid directly by the tenant. If all utilities are included in the rent, there is no utility allowance. Utility allowances vary by unit type and are listed on the PHA's Utility Allowance Schedule.

UTILITY REIMBURSEMENT PAYMENT. The amount, if any, by which the Utility Allowance for the unit, if applicable, exceeds the Total Tenant Payment for the family occupying the unit.

VACANCY LOSS PAYMENTS. When a family vacates its unit in violation of its lease, the owner is eligible for 80% of the Contract Rent for a vacancy period of up to 1 additional month, if he notifies the PHA as soon as he learns of the vacancy, makes an effort to advertise the unit, and does not reject any eligible applicant except for good cause.

VERY LOW INCOME FAMILY. A Lower Income Family whose Annual Income does not exceed 50% of the median income for the area, as determined by HUD, with adjustments for smaller and larger families. HUD may establish income limits higher or lower than 50% of the median income for the area on the basis of its finding that such variations are necessary because of unusually high or low family incomes. This is the income limit for the Certificate and Voucher Programs.

VETERAN. A person who has served in the active military or naval service of the United States at any time and who shall have been discharged or released therefrom under conditions other than dishonorable.

ATTACHMENT I

CMHA

PEST CONTROL POLICY

AND

PROCEDURE

Pest Control Policy

CMHA's goal is to provide safe, decent and sanitary housing for its residents. In doing so CMHA's pest control policy is to limit and eradicate pest and rodents in its units and community spaces.

In eradicating and limiting pest and rodents within our developments and community spaces CMHA has specified eradication and limited contracts with three pesticide contractors. The contractors provide pest control services for elderly high rises, Family communities, and Scattered Site housing units as outlined in the environmental pest control process.

The process in the accepted proposals conform to bid specifications of February 1998. CMHA in its attempt to control and eradicate pest and assist its residents has on its staff a Housekeeping employee who is certified by the State to also perform pest control extermination. The position's primary responsibilities are to coordinate pest control schedules and services, provide immediate pest control services in the absence of contractor and to make housekeeping referrals.

The actions of CMHA reflect the seriousness to our commitments in providing safe, decent, sanitary and pest free environments for our residents.

PEST CONTROL PROCEDURE

A. INTENT

To provide pest control services for CMHA developments and community spaces. CMHA has contracted with three (3) pest control companies.

B. SCOPE OF WORK:

The implementation of a integrated pest management program, designed for the eradication of all ants, cockroaches and other household pest.

The pesticide contractor's pest management program will provide identification, prevention, monitoring and evaluation services utilizing the following tools:

1. Sanitation - Resident Education
2. Inspections
3. Baits
4. Evaluation Reports
5. Trapping (Sticky Traps, Glue Boards)
6. Flushing Agents (Pyrethrins)
7. Residual Insecticides

C. IMPLEMENTATION:

1. Prevention

Sanitation is critical in any roach control program. Contractor's will provide ongoing information to educate residents not only to the connection between sanitation and the control of unwanted pests, but to the ultimate goal of controlling the spread of germs and diseases. (See sample letter to residents.)

2. Monitoring

Each of the twelve (12) months of the contract a technician from contractors will extensively inspect (pulling stoves, refrigerators and cabinet draws, etc.) In each CMHA unit during treatments, to identify levels of infestation and target units (see Inspection Form). Technicians will utilize inspect mirrors, flashlights and sticky traps in this effort.

3. Pesticides

The primary pesticides will be Hydramethylnon (Max Force) and Abamectin (Avert) crack and crevice bait, both proven to be effective against resistant roaches while creating the least disruption to the environment (very little if any resident preparation needed). Each of the

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twelve (12) months of the contract a technician will locate cockroaches harborage areas and make bait applications directly to nesting site.

4. Evaluation

Contractor's will submit biweekly reports to CMHA outlining levels of infestations and corrective measures for management (water leaks, caulking. Etc.) And residents (sanitation). (See Evaluation Report)

D. APPROVED MATERIALS:

Contractor shall use only insecticides and materials approved by the United States Environmental Protection Agency and acceptable to the Columbus Metropolitan Housing Authority for use in commercial pest control.

E. AREA AND SERVICE FREQUENCY:

Monthly treatments of the interior of all units a outlines in specifications Bid No. 1-98. Technicians will need approximately 10-15 minutes to inspect and treat each unit. Approximate time will vary based on levels of infestation.

F. OTHER SERVICES OFFERED:

1. Sanitation Workshops

Roach control in multi-housing has always been a challenge. Communicating between the tenants, management and the pest control operator is an extremely important aspect, to control the roach population, not individual roaches.

The population in a given community is determined by the amount of food, water and harborage available. Permanent reduction in one or more vital factors will result in a permanent reduction in the (roach) population. Sanitation is thus the first and foremost requirement for permanent control.

Sanitation levels in a multi-unit housing community will vary from unit to unit. It will usually be as good or as bad as the inclination of those responsible for it. The desire for good sanitation must be in

the minds of those who do the work of achieving it. Therefore, a pest control operator seeking permanent control of household pests must offer a sanitary training to educate customers not only to the close connection between sanitation and the control of pests, but to the ultimate goal of controlling the spread of germs and diseases.

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The contractor will offer Pre-Orientation and Remedial Sanitation Safety Workshops as requested by Property Management or on-site residents in conjunction with its other services. Although educational services are customized to meet the needs of each tenant population, the following is a general outline of the workshop.

WORKSHOP OUTLINE

A. Cockroaches/rodents

1. Life cycle and habits
2. Prevention
3. Spread of germs and diseases
4. Resistance

B. Insecticide and their usage

C. Pest management: The need for a cooperative effort.

1. The role of tenants, management and the pest control operator.

D. Sanitation tips for controlling vita factors (food, water, and harborage).

1. Property disposal of garbage
2. Proper food storage
3. Proper unit maintenance

G. Residents and Management Meetings

A representative of the pest control company will be required to attend Resident Council meetings to address tenant concerns. A schedule of meetings for a one year period will be made available to the contractor at the time of contract award. Meetings will be a requirement for the first quarter of the contract and as requested during the remainder of the contract. Meeting will not be

mandatory for the scattered site contractor. Property Management will be responsible for contacting the contractors.

Meetings will also be scheduled on and as need basis with select CMHA personnel and the contractor. These meeting will be mandatory and will be used to maintain communication and to discuss any problem areas as they arise.

H. Requirements

CMHA will require all work to be completed as specified. CMHA will refuse payment of

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invoices in which any work has not been completed to our specifications and will be held until such work has been completed to CMHA's satisfaction.

VII. Schedule of Treatment

CMHA's Housing Inspector, in conjunction with the contractor, will submit at the beginning of the contractor period, a quarterly schedule stating time and date(s) of each community to be treated, allowing sufficient advance notice to residents.

CMHA's management will supply keys and authorize personnel to unlock and lock doors to all common areas. The contractor will provide written notification to management of units that are occupied by residents who will not allow contractor's to service their units.

Dear Resident:

Following these helpful hints will greatly reduce the possibility of cockroach infestation. Always remember our goal is to limit the amount of food, water and shelter available to unwanted pest.

1. Always keep sinks, tubs, and counter tops dry
2. Store all goods in air tight containers
3. Place trash in plastic bags and remove frequently
4. Clean and dry all dishes
5. Clean food spills immediately
6. Clean all appliances as needed
 - (1) Stove (oven, behind, top, racks and drip pans)
 - (2) Refrigerator (behind, top)
7. Reduce excessive clutter
8. Report water leaks immediately
9. Report infestations

Cockroach control in multi-unit housing has always been a challenge but with your support we can create a healthier environment in which to live.

Sincerely,

CONTRACTOR'S INSPECTION REPORT

DATE: ___/___/___/

APARTMENT NUMBER: _____

KITCHEN:

Stove Area _____

Behind Stove _____

Inside Stove Top _____

Refrigerator Top _____

REFRIGERATOR AREA:

Refrigerator Door _____

Refrigerator Grill _____

Behind Refrigerator _____

Refrigerator Top _____

SINK AREA:

Counter Tops _____

Under Sink _____

Cabinets _____

Drawers _____

Floors _____

Walls _____

OTHER NOTES: _____

Food Storage: Poor _____ Good _____ Excellent _____

Trash in plastic bags Yes _____ No _____

BATHROOM:

Sink Area _____

Sink Top _____

Cabinets _____

Floors _____

Toilet _____

Walls _____

OTHER NOTES: _____

Trash in plastic bags? Yes _____ No _____

LIVING ROOM:

Closets _____

Floors _____

Walls _____

BEDROOM:

Closets _____

Floors _____

Walls _____

COMMENTS: _____

- CODES: (1) Cleaning Needed (2) Excessive Clutter
 (3) Excessive Moisture (4) Exclusion Needed
 (5) Maintenance Needed (6) Infestation

COLUMBUS METROPOLITAN HOUSING AUTHORITY
CONTINUED OCCUPANCY AND COMMUNITY SERVICE

REVISED 8-23-00
DRAFT

GENERAL:

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

EXEMPTIONS:

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

- A. Family members who are 62 or older
- B. Family members who are blind or disabled
- C. Family members who are the primary care giver for someone who is blind or disabled
- D. Family members engaged in full time employment
- E. Family members who are enrolled in any state or local college or accredited vocational school
- F. Family members receiving assistance under a State program funded under Part A Title IV of the Social Security Act or under any other State welfare program, including welfare-to work and who are in compliance with that program

COLUMBUS METROPOLITAN HOUSING AUTHORITY
CONTINUED OCCUPANCY AND COMMUNITY SERVICE

NOTIFICATION OF THE REQUIREMENT:

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

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

The notification will advise families of their community service obligation which will be in effect on October 1, 2000 and shall coincide with first annual reexamination. For family's paying a flat rent, the obligation begins on the date their annual reexamination would have been effective had an annual reexamination taken place. The notice will also advise them that failure to comply with the community service requirement will result, ineligibility for continued occupancy at the time of any subsequent annual reexamination.

COMMUNITY SERVICE:

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

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

VOLUNTEER OPPORTUNITIES:

CMHA will coordinate with social service agencies, local schools, and the Human Services Office in identifying a list of volunteer community service programs

CMHA may create volunteer positions such as hall monitoring, litter patrols, block watch programs, assist seniors in the community or other positions that provide a benefit to the community and resident.

NOTIFICATION IF NON-COMPLIANCE WITH COMMUNITY SERVICE REQUIREMENT:

CMHA will notify any family member and head of household found to be in non-compliance of the following:

- A. The family member(s) has been determined to be in noncompliance;
- B. That the determination is subject to the grievance procedure;
- C. That, unless the family member(s) enter into an agreement to comply, the lease will be terminated:

OPPORTUNITY FOR CURE:

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

Management will assist the family member(s) in identifying volunteer opportunities within the community by providing literature on various programs/agencies

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

behind in their obligation under the agreement to perform community service CMHA shall take action to terminate the lease.

Family members may request a grievance hearing from CMHA in accordance to 24 Consolidated Federal Register 966 subpart B.

