

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

South Windsor
Housing Authority
Tenant-Based Assistance Plans
5 Year Plan for Fiscal Years 2000 - 2004
Annual Plan for Fiscal Year 2000

**PHA Plan
Agency Identification**

PHA Name: South Windsor Housing Authority

PHA Number: CT-033-VO

PHA Fiscal Year Beginning: (01/2000)

Public Access to Information

Information regarding any activities outlined in this plan can be obtained by contacting:

Main administrative office of the PHA located at following address:

South Windsor Housing Authority
50 Elm Street
South Windsor CT 06074
(860) 644-3082

Contract Administrator office located at the following address:

Imagineers
635 Farmington Avenue
Hartford, CT 06105
(860) 247-2318

Display Locations for PHA Plans and Supporting Documents

The PHA Plans (including attachments) are available for public inspection at:

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5-YEAR PLAN
PHA FISCAL YEARS 2000 - 2004

[24 CFR Part 903.5]

A. Mission

The primary objective of the South Windsor Housing Authority's Section 8 Tenant Based Assistance, Housing Choice Voucher program is to assist eligible low-income families to obtain decent, safe and sanitary housing. The mission of the South Windsor Housing Authority is to promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.

B. Goals

The goals and objectives listed below are derived from HUD's strategic Goals and Objectives and those emphasized in recent legislation

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:

PHA Goal: Improve the quality of assisted housing

Objectives:

Obtain a high SEMAP score.

Continue to improve voucher management: (SEMAP score)

Concentrate on efforts to improve specific management functions: (increase lease up rate percentage, increase percentage of corrected determined adjusted income, increase supporting data for rent reasonableness determination).

Promote awareness to program participants of the dangers of lead poisoning hazards by providing additional handout material during orientation and recertification. (Supported by case file documentation)

PHA Goal: Increase assisted housing choices

Objectives:

Provide voucher mobility counseling (measurable by the number of participants that chose to practice mobility).

- Conduct outreach efforts to potential voucher landlords through the listings of advertised available apartment rentals.
- Review the need to increase the voucher payment standards annually.
- Consider implementing voucher homeownership program when final regulations are published:

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:
- Attract supportive services to improve assistance recipients' employability:
- Attract supportive services to increase independence for the elderly or families with disabilities.

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: (recorded in fair housing documentation)
- 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: (recorded in fair housing documentation)
- Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required: (recorded in fair housing documentation)

Other PHA Goals and Objectives: (list below)

PHA Goal: Improve tenant-based assistance program services to better serve program participants.

Objectives:

1. Develop more comprehensive rental survey data to assist in rent reasonableness determinations and need for exception rents or higher payment standards by December 31, 2001.
2. Develop new tenant-based assistance home ownership program and advertise to eligible program participants by December 31, 2002.
3. Maximize enrollment and housing choice opportunities based on funding availability (ongoing).

Annual PHA Plan
PHA Fiscal Year 2000

[24 CFR Part 903.7]

i. Annual Plan Type:

Select which type of Annual Plan the PHA will submit.

- Standard Plan**

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

- Troubled Agency Plan**

ii. Executive Summary of the Annual PHA Plan

[24 CFR Part 903.7 9 (r)]

The South Windsor Housing Authority (NHA) Tenant Based Assistance plan(s) represents an overview of the policies, rules and requirements concerning the NHA Tenant Based Assistance operations, programs and services. Through this 5-year plan and annual plan South Windsor Housing Authority advises HUD, its program participants and interested parties of its mission for serving the needs of low-income and very low-income families, and the NHA strategy for addressing those needs. The South Windsor Housing Authority is only required to submit a streamlined plan on the following information: Housing needs, financial resources, (policies that govern eligibility, selection and admission), rent determination policies, grievance procedures, homeownership programs, community service and self-sufficiency, civil rights certification, and fiscal audit results.

iii. Annual Plan Table of Contents

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Attachments

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

Attachments:

- Attachment A PHA Management Organizational Chart
- Attachment B Comments of Resident Advisory Board or Boards
- Attachment C PHA Plan Certification of Compliance with the PHA Plans and Related Regulations
- Attachment D State/Local Government Certification of Consistency with Consolidated Plan
- Attachment E Fair Housing Documentation
- Attachment F South Windsor Housing Authority Tenant Based Assistance Administrative Plan
- Other (List below, providing each attachment name)

Supporting Documents Available for Review

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

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

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
X	Fair Housing Documentation: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions' initiatives to affirmatively further fair housing that require the PHA's involvement.	5 Year and Annual Plans
X	Consolidated Plan for the jurisdiction/s in which the PHA is located (which includes the Analysis of Impediments to Fair Housing Choice (AI)) and any additional backup data to support statement of housing needs in the jurisdiction	Annual Plan: Housing Needs
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Section 8 rent determination (payment standard) policies <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
X	Section 8 informal review and hearing procedures <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
	Policies governing any Section 8 Homeownership program check here if included in the Section 8 Administrative Plan (final regulations not published.)	Annual Plan: Homeownership
	Any cooperative agreement between the PHA and the TANF agency	Annual Plan: Community Service & Self-Sufficiency
	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
	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
	Other supporting documents (optional) (list individually; use as many lines as necessary)	(specify as needed)

1. Statement of Housing Needs

[24 CFR Part 903.79 (a)]

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

Based upon the information contained in the Consolidated Plan/s applicable to the jurisdiction, and/or other data available to the PHA, provide a statement of the housing needs in the jurisdiction by completing the following table. In the "Overall" Needs column, provide the estimated number of renter

families that have housing needs. For the remaining characteristics, rate the impact of that factor on the housing needs for each family type, from 1 to 5, with 1 being “no impact” and 5 being “severe impact.” Use N/A to indicate that no information is available upon which the PHA can make this assessment.

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Loca-tion
Income <= 30% of AMI (<\$13,650)	295	4	NA	NA	NA	NA	NA
Income >30% but <=50% of AMI (>\$13,651, <=\$22,600)	366	4	NA	NA	NA	NA	NA
Income >50% but <80% of AMI (>\$22,601, <=\$36,400)	1,117	2	NA	NA	NA	NA	NA
Elderly(total elderly pop. in jurisdiction)	2,223/ 22,090	NA	NA	NA	NA	NA	NA
Families with Disabilities	NA	NA	NA	NA	NA	NA	NA
Race1/Ethnicity1	108	NA	NA	NA	NA	NA	NA
Race2/Ethnicity1	6	NA	NA	NA	NA	NA	NA
Race3/Ethnicity1	0	NA	NA	NA	NA	NA	NA
Race4/Ethnicity1	15	NA	NA	NA	NA	NA	NA
Race1/Ethnicity2	7479	NA	NA	NA	NA	NA	NA
Race2/Ethnicity2	150	NA	NA	NA	NA	NA	NA
Race3/Ethnicity2	0	NA	NA	NA	NA	NA	NA
Race4/Ethnicity2	92	NA	NA	NA	NA	NA	NA

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

- X U.S. Census data: the Comprehensive Housing Affordability Strategy (“CHAS”) dataset 1990
- X American Housing Survey data
Indicate year: 1995
- X State of Connecticut Department of Economic and Community Development
Analysis of Impediments to Fair Housing Choice.
- X State of Connecticut Department of Economic and Community Development
Consolidated Plan. September 1999
- X Town of South Windsor Plan of Development

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

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

Housing Needs of Families on the Section 8 Tenant-Based Waiting List			
Waiting list type: Section 8 tenant-based assistance			
	# of families	% of total families	Annual Turnover
Waiting list total	17		3
Extremely low income <=30% AMI	11	65%	
Very low income (>30% but <=50% AMI)	5	34%	
Low income (>50% but <80% AMI)	1	1%	
Families with children	7	41%	
Elderly families	2	12%	
Families with Disabilities	8	48%	
Race=1/ethnicity=1	4	24%	

Housing Needs of Families on the Section 8 Tenant-Based Waiting List			
Race=1/ethnicity=2	3	18%	
Race=2/ethnicity=2	9	53%	
Race=2/ethnicity=2	9	53%	
<p>Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes</p> <p>If yes:</p> <p>How long has it been closed (# of months)? 60 months</p> <p>Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes</p> <p>Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes</p>			

C. Strategy for Addressing Needs

The South Windsor Housing Authority through its contractor may reopen the Section 8 tenant-based waiting list within the next eighteen months. This decision will be based on the need to have more families qualified in anticipation of available tenant-based subsidies. When the waiting list is reopened every effort will be made to offer all qualified families an equal opportunity to apply.

(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:

- 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
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies

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

- Consider applying for additional section 8 units should they become available
- Pursue housing resources other than public housing or Section 8 tenant-based assistance.

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

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

- Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance. The pool of applicant families ensures that the PHA will meet income-targeting requirements.

Need: Specific Family Types: The Elderly

Strategy 1: Target available assistance to the elderly:

- Apply for special-purpose vouchers targeted to the elderly, should they become available

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

- 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

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:

- Affirmatively market to races/ethnicities shown to have disproportionate housing needs

Strategy 2: Conduct activities to affirmatively further fair housing

- 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 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

2. Statement of Financial Resources

[24 CFR Part 903.7 9 (b)]

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 2000 grants)	0	0
a) Public Housing Operating Fund	0	
b) Public Housing Capital Fund	0	
c) HOPE VI Revitalization	0	
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	310,697	

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)	0	
g) Resident Opportunity and Self-Sufficiency Grants	0	
h) Community Development Block Grant	0	0
i) HOME	0	0
Other Federal Grants (list below)	0	0
2. Prior Year Federal Grants (unobligated funds only) (list below)		
	0	0
3. Public Housing Dwelling Rental Income		
	0	0
4. Other income (list below)	0	0
4. Non-federal sources (list below)	0	0
Total resources	310,697	310,697

3. PHA Policies Governing Eligibility, Selection, and Admissions

[24 CFR Part 903.79 (c)]

A. Public Housing (N/A)

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?
- Screening for income eligibility.
- Criminal or drug-related activity only to the extent required by law or regulation.
- b. The PHA does not request criminal records from local law enforcement agencies or screening purposes.
- c. The PHA does not request criminal records from State law enforcement agencies for screening purposes.
- d. The PHA does not 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?

Information is provided to prospective owners regarding participating families in the following manner; upon request the PHA gives prospective owners the family's current address and if known, the name and address of the property owner of the family's current address and prior address.

The PHA may also provide any tenancy history that involves eviction action initiated against the family. Or information pertaining to damage, vacancy and unpaid rent claims paid out on behalf of the family.

(2) Waiting List Organization

- a. With which of the following program waiting lists is the section 8 tenant-based assistance waiting list merged?
- None

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

Contract Administrator office located at the following address:
Imagineers
635 Farmington Avenue
Hartford, CT 06105

(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:

Difficulties encountered in obtaining or locating decent and safe housing. (See Administrative Plan for policies pertaining to this issue.)

(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)

Preferences

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition, Victims of Domestic Violence)
- Substandard housing
- High rent burden (rent is > 50 percent of income)
- Elderly, Disabled or Handicapped family members(disabled or handicapped as defined in Section 223 of the Social Security Act).
- Residents who live and/or work in South Windsor.

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

Preferences

- 1 The combination of “Residents who live and/or work in South Windsor” and any other Identified Preference.
- 2 Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition, Victims of domestic violence)
- 2 Substandard housing
- 2 High rent burden
- 2 Elderly, Disabled or Handicapped family members(disabled or handicapped as defined in Section 223 of the Social Security Act).
- 3 Residents who live and/or work in South Windsor.
- 4 No Preference

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

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

Through published notices

Other (Housing Voucher Family Self-Sufficiency program was advertised to all waiting list applicants and current program participants).

4. PHA Rent Determination Policies

[24 CFR Part 903.7 9 (d)]

A. Public Housing

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

(N/A)

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

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

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

- Annually

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 (Rent Survey and Market Data)

(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? The PHA has followed the requirements outlined as follows:

(QHWRA established certain exemptions to the minimum rent requirements for hardship circumstances. Section 3(a)(3)(B) of the USHA generally states that financial hardship includes the following situations: (1) the family has lost eligibility determinations for a Federal, State, or local assistance program; (2) the family would be evicted as a result of the imposition of the minimum rent requirement; (3) the income of the family has decreased because of changed circumstances, including loss of employment; (4) a death in the family has occurred; and (5) other circumstances determined by the PHA or HUD.)

5. Operations and Management

[24 CFR Part 903.7 9 (e)]

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

A. PHA Management Structure

Describe the PHA's management structure and organization.

(select one)

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

B. HUD Programs Under PHA Management

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

Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	NA	NA
Section 8 Vouchers	25	2
Section 8 Certificates	10	1
Section 8 Mod Rehab	NA	NA
Special Purpose Section 8 Certificates/Vouchers (list individually)	NA	NA

Public Housing Drug Elimination Program (PHDEP)	NA	NA
Other Federal Programs(list individually)	NA	NA

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)
(N/A)

(2) Section 8 Management: (list below)
South Windsor Housing Authority Administrative Plan

6. PHA Grievance Procedures

[24 CFR Part 903.7 9 (f)]

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

A. Public Housing
(N/A)

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:

None

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

Other: Contract Administrator office located at the following address:

Imagineers
635 Farmington Avenue
Hartford, CT 06105
(860) 247-2318

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.

(N/A)

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.

(N/A)

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

[24 CFR Part 903.7 9 (i)]

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

(N/A)

10. Conversion of Public Housing to Tenant-Based Assistance

[24 CFR Part 903.7 9 (j)]

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

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

(N/A)

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

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

11. Homeownership Programs Administered by the PHA

[24 CFR Part 903.7 9 (k)]

A. Public Housing

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

(N/A)

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: Section 8 Homeownership:
(Program description, size of program, eligibility criteria and program design will be developed once final regulations have been issued and reviewed).

- a. Size of Program *(To be determined)*

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

12. PHA Community Service and Self-sufficiency Programs

[24 CFR Part 903.7 9 (l)]

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

A. PHA Coordination with the Welfare (TANF) Agency

1. Cooperative agreements:

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

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

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

- X Client referrals
X Information sharing regarding mutual clients (for rent determinations and otherwise)
X Coordinate the provision of specific social and self-sufficiency services and programs to eligible families
 _ Jointly administer programs
 _ Partner to administer a HUD Welfare-to-Work voucher program
 _ Joint administration of other demonstration program
 _ Other (describe)

B. Services and programs offered to residents and participants

(1) General

a. Self-Sufficiency Policies

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

- NA Public housing rent determination policies
NA Public housing admissions policies
 _ Section 8 admissions policies

- NA** 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
- NA** 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)

(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: 9/1/99)
Public Housing	NA	NA
Section 8	0	0

b. Yes No: If the PHA is not maintaining the minimum program size required by HUD, does the most recent FSS Action Plan address the steps the

PHA plans to take to achieve at least the minimum program size?

NA

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)

NA Adopting appropriate changes to the PHA's public housing rent determination policies and train staff to carry out those policies

X Informing residents of new policy on admission and reexamination

NA Actively notifying residents of new policy at times in addition to admission and reexamination.

X Establishing or pursuing a cooperative agreement with all appropriate TANF agencies regarding the exchange of information and coordination of services

X Establishing a protocol for exchange of information with all appropriate TANF agencies

– Other: (list below)

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

13. PHA Safety and Crime Prevention Measures

[24 CFR Part 903.7 9 (m)]

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

(N/A)

14. RESERVED FOR PET POLICY

[24 CFR Part 903.7 9 (n)]

(N/A)

15. Civil Rights Certifications

[24 CFR Part 903.7 9 (o)]

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

16. Fiscal Audit

[24 CFR Part 903.7 9 (p)]

1. Yes No: Is the PHA required to have an audit conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h))?
(If no, skip to component 17.)
2. Yes No: Was the most recent fiscal audit submitted to HUD?
3. Yes No: Were there any findings as the result of that audit?
4. Yes No: If there were any findings, do any remain unresolved?
If yes, how many unresolved findings remain? _____
5. Yes No: Have responses to any unresolved findings been submitted to HUD?
If not, when are they due (state below)?

17. PHA Asset Management

[24 CFR Part 903.7 9 (q)]

(N/A)

18. Other Information

[24 CFR Part 903.7 9 (r)]

A. Resident Advisory Board Recommendations *(to be added after preliminary draft is reviewed by Resident Advisory Board)*

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 as Attachment B "Comments of Resident Advisory Board"
 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:

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)
- b. Eligible candidates: (select one)
- Any recipient of PHA assistance
 - Any head of household receiving PHA assistance
 - Any adult recipient of PHA assistance
 - Any adult member of a resident or assisted family organization
 - Other (list)
- c. Eligible voters: (select all that apply)
- All adult recipients of PHA assistance (public housing and section 8 tenant-based assistance)
 - Representatives of all PHA resident and assisted family organizations
 - Other (list)

C. Statement of Consistency with the Consolidated Plan

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

1. Consolidated Plan jurisdiction: (South Windsor)

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)

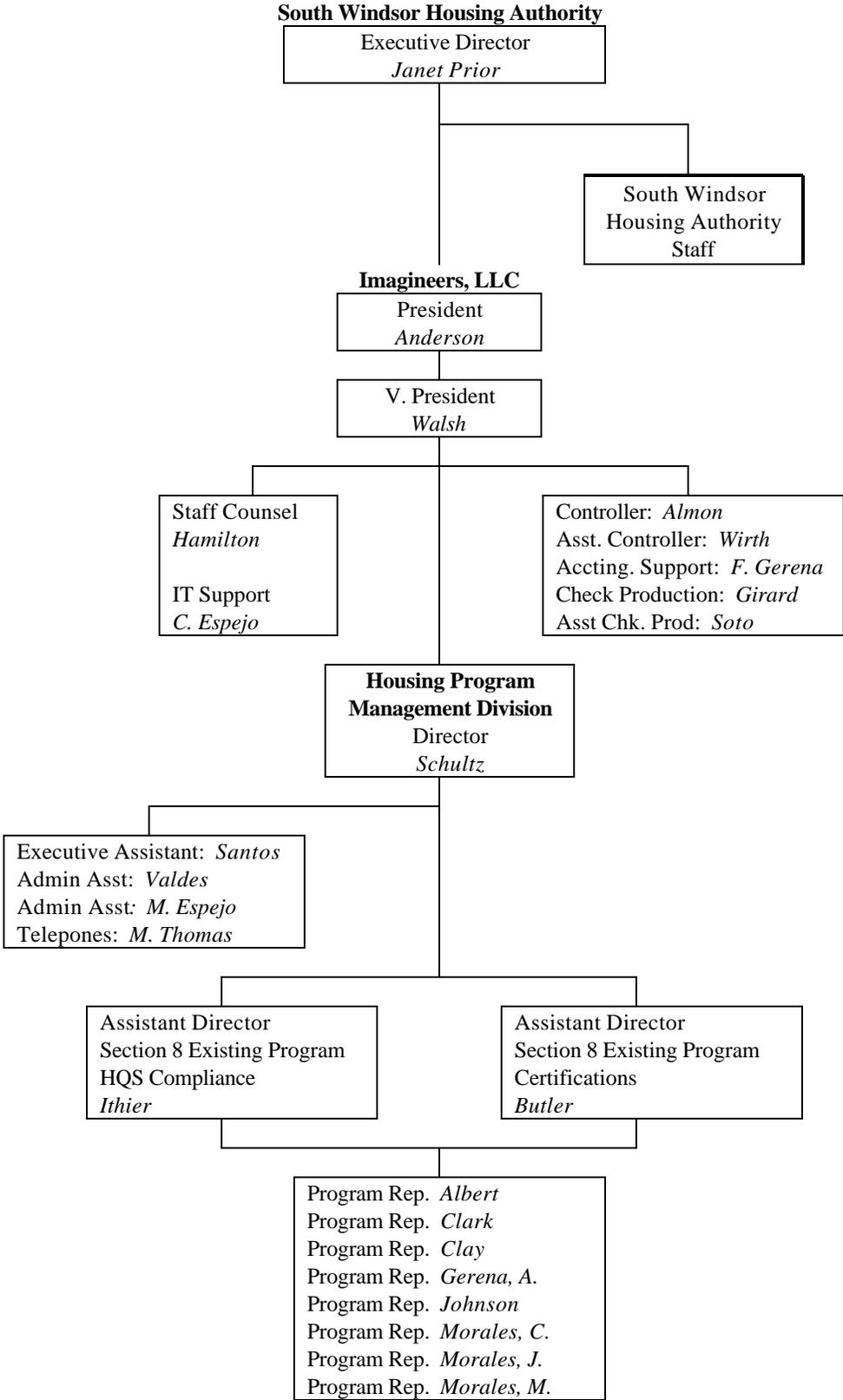
D. Other Information Required by HUD

Attachments

- Attachment A PHA Management Organizational Chart
- Attachment B Comments of Resident Advisory Board or Boards
- Attachment C PHA Plan Certification of Compliance with the PHA Plans and
Related Regulations
- Attachment D State/Local Government Certification of Consistency with
Consolidated Plan
- Attachment E Fair Housing Documentation
- Attachment F South Windsor Housing Authority Tenant Based Assistance
Administrative Plan

Attachment A

The Management Organization Chart for South Windsor Housing Authority and their Section 8 Contract Administrator (Imagineers Housing Program Management Division).



Comments from Program Participants in Lieu of Resident Advisory Board

A mailing was conducted on December 29, 1999 to all current program participants. The mailing included the draft 5-year and Annual Plan, a survey response form, a self-addressed stamp envelope and a cover letter. The mailing invited them to serve on a resident advisory board and/or make comments or recommendations on the draft 5-year and Annual Plan.

One person expressed interest in serving on a resident advisory board. There were two survey forms returned with the following comments:

1. "I would like to see more assistance with regard to heating the units. Some units are not insulated properly. This causes a hardship on Section 8 tenants. Also, were excited about homeownership program"
2. "You're doing a great job."

In response to the survey questions both respondents answered yes to all of the following questions: Are the housing goals identified in the 5-year plan sufficient?; Are the objectives identified to achieve the housing goals sufficient?; Are the housing needs of applicants adequately identified?; Are the strategies identified to address the housing needs adequate?

**Reserved for
PHA Certification of Compliance with the PHA Plans
And Related Regulations
Board Resolution to Accompany the PHA Plan**

**Reserved for
Certification by State or Local Official of PHA Plans Consistency with
The Consolidated Plan**

I, Elliot Stone, the State of Connecticut Department of Economic and Community Development official certify that the Five Year and Annual PHA Plan of the South Windsor Housing Authority is consistent with the Consolidated Plan of the State of Connecticut Prepared pursuant to 24 CFR Part 91.

Signed / Dated by Elliot Stone, DECD, State of Connecticut

MEETING REPORT: 1

DATE: August 17, 1999

TOPIC: Analysis of Impediments to Fair Housing Choice

ATTENDING:

K. Schultz	Director, Program Management
S. Butler	Assistant Director
V. Ithier	Assistant Director
M. Santos	Executive Assistant

Meeting Record: A meeting was conducted between the above personnel to discuss issues relating to impediments of fair housing choice in the Tenant Based Section 8 Program. This action was initiated in response to new requirements outlined in Section 982.53 (c) of the Federal Regulations. The new equal opportunity requirements obligate housing agencies to affirmatively further fair housing in the programs that it administers. This meeting report constitutes the initial meeting on this issue and a commitment to document the continuation of this analysis and action taken as a result of this review. Member(s) of the resident advisory board will be included in future analysis and review of the impediments of fair housing choice in the Tenant Based Section 8 Program. This memo constitutes a summary of topics discussed and/or conclusions reached at this meeting.

What follows is an analysis of impediments to fair housing choice for the Tenant-Based Section 8 Program and specific action outlined to address those impediments. (This analysis was guided by staff review of program records and program experience, as well as, information provided in the State of Connecticut Department of Economic and Community Development Analysis of Impediments to Fair Housing Choice):

Analysis of impediments to fair housing choice for the Tenant-Based Section 8 Program

1. Listing of handicap accessible units to interested clients is sometimes insufficient.

Develop a more comprehensive listing of handicap accessible units using the following strategies:

- Assign a specific staff person to coordinate identification and dissemination of known or available handicap accessible units.
- Identify possible agencies that might have listings of handicapped accessible units.
- Have program staff identify handicap accessible units through normal program operation and forward information to staff person responsible for maintaining list.
- Ensure that property owners that list vacant apartments are screened to determine if the units are handicap accessible and if so identify them in that manner.

ADMINISTRATIVE PLAN

**FOR SECTION 8 CERTIFICATE AND
HOUSING VOUCHER PROGRAMS**

**SOUTH WINDSOR
HOUSING AUTHORITY**

SEPTEMBER 1999

I N D E X

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APPENDIX I. A PROPERTY OWNERS GUIDE TO THE SECTION 8 PROGRAMAPPENDIX II. A GUIDE TO THE HOUSING VOUCHER AND/OR SECTION 8 CERTIFICATE PROGRAMAPPENDIX III. PROGRAM CONTROLS

SECTION I. APPLICABILITY AND SCOPE

A. Mission Statement

The primary objective of administering the South Windsor Housing Authority's Section 8 Existing Housing Certificate and Housing Voucher programs is to assist eligible low-income families to obtain decent, safe and sanitary housing.

B. General

The South Windsor Housing Authority is the designated Housing Agency (HA) for the Town of South Windsor. The HA has contracted for the preparation and submission of Section 8 Housing Assistance funding applications and for the administration and enforcement of these programs. The HA's contractor is Imagineers, LLC. Imagineers, LLC. will hereinafter be referred to as "the Contractor."

The Town of South Windsor recognizes the housing needs of its low and moderate income residents. The Section 8 Certificate and Housing Voucher programs are a responsive mechanism for providing immediate housing assistance for low and very-low income households. The rental subsidy enables tenants to afford standard units while providing rental income sufficient to meet the operating expenses of the landlords.

The Contractor prepares for HA review and approval all necessary annual budgets, revisions, increments, and quarterly requisitions required by HUD. The Contractor processes monthly Housing Assistance Payments requisitions through the HA. The Contractor submits financial audits and management reports as required by the HA or Housing and Urban Development (HUD) office. The Contractor makes available for review at any time all program financial records. The Contractor maintains a financial system designed to comply with HUD issuances HM75-32 and the applicable section of the "Low-Rent Housing Accounting Handbook" 7501.1 as well as other directives of HUD and the HA.

In addition to the reports required from the HA by HUD, the Contractor provides monthly program activity reports to the HA. More frequent and additional reports can be provided as requested by the HA. Special reports required by HUD will be prepared and additional requests will be met as directed by the HA.

The policies and procedures contained herein are applicable to implementation of housing assistance payments on behalf of eligible families by leasing existing housing pursuant to the provisions of Section 8 of the U.S. Housing Act of 1937.

C. Equal Opportunity Statement

The HA and its Contractor will comply with the Fair Housing Act, Title VI of the Civil Rights Act of 1964, the Age Discrimination Act of 1975, Executive Order 11063, Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act and all related rules, regulations, and requirements.

The HA and its Contractor will not on account of race, color, creed, national origin, sex, handicap, or familial status deny to any family the opportunity to apply for admission nor deny an eligible applicant the opportunity to lease or rent a dwelling unit; if suitable to its needs. In the selection of families, there will be no discrimination against families otherwise eligible for admission because their income is derived in whole or in part from public assistance.

SECTION II. PLANS FOR THE ADMINISTRATION OF PROGRAM FUNCTIONS

The overall administrative approach includes an accessible Contractor office suitable to accommodate client households and other interested parties, in the performance of all tasks required by the Section 8 regulations.

The Contractor provides the following program services as specified by HUD for proper administration of Section 8 Certificate and Housing Voucher programs. Other HA responsibilities within the Town of South Windsor rest with the HA.

A. Outreach to Families and Contact with Owners

The Contractor utilizes a variety of means to publicize and disseminate information regarding the Section 8 Certificate and Housing Voucher programs for income-eligible households. Aside from the conventional print and broadcast media, the Contractor meets with community organizations, owner and renter associations, block groups, neighborhood planning and development committees, social clubs, governmental departments, advocacy agencies, and church groups. The Contractor's local, housing development and management experience and capabilities enhance its ability to disseminate useful relevant information to the widest audience.

The Contractor also recognizes that special outreach may be necessary to assist the following: families suffering a language barrier, disabled or handicapped persons, and the very low income, or very large families.

B. Taking Applications and Suspension of Taking Preliminary Applications

All applicants will be required to complete an application form, which will contain information necessary for the Contractor to determine whether the applicant is eligible. Incomplete applications will not be taken.

When the number of families on the HA waiting list is such that there is no reasonable prospect that additional applicants could receive assistance within a reasonable time period, the Contractor may suspend the taking of applications.

The decision to open or closed the waiting list will be based on whether the existing waiting list contains an adequate pool of applicants for the use of available program funding.

When a determination is made that the waiting list needs to be opened or closed to new applicants, the Contractor will give proper public notice before such action is taken. The public notice will be by publication in a local newspaper of general circulation, and also by minority media and other suitable means. The notice will comply with HUD fair housing requirements.

C. Completion of Applications, Determination of Eligibility and Selection of Families Applications are taken in person and filled out by program staff during normal business hours (Monday-Friday, 8:00 a.m. to 5:00 p.m.). Appointment's for applications may be necessary to accommodate the reopening of the waiting list. Applications are not prepared by telephone or received by mail unless it is necessary to accommodate an individual applicant's disability. Occasionally, Contractor staff will be sent to the home of the applicant in order to accept an application. Handouts are made available to potential applicants to explain how to apply. Verbal instructions are also provided.

For purposes of applying "family" is defined to include but is not limited to, an elderly person (at least 62 years old or older), the remaining family member of a tenant family, and a displaced person. For purposes of applying "continuously assisted" is defined as an applicant who is continuously assisted under the 1937 Housing Act if the family is already receiving assistance under any 1937 Housing Act program when the family is admitted to the certificate or voucher program.

Determination of Eligibility

An applicant shall be determined eligible if the applicant:

1. Has income not exceeding the applicable Section 8 very-low income limits;
2. Has not committed fraud or misrepresentation in connection with any federally assisted housing program;
3. Does not owe rent or other amounts to the HA or any public housing in connection with Section 8 or public housing assistance under the U.S. Housing Act of 1937;

4. Has reimbursed the HA or any public housing authority for any amounts paid to an Owner;
5. Has not previously violated the Family Obligations in 24 GFR 982.551, and Head of household or oldest family member is at least 18 years old or emancipated.

Applicant data is maintained on the initial application form, which is pre-printed in numerical sequence. Waiting list reports maintain data in several different manners including; chronological order by date of application and level of priority; numerical sequence by pre-printed numbers on application form; and alphabetical by applicant's last name.

There is only one waiting list for all applicants regardless of the bedroom size the applicant may need. Each applicant shall be assigned an appropriate place on the waiting list in sequence based upon the date and time of application, as well as the following three priority factors: (The three (3) priority factors listed below were originally mandated by the Federal regulations that govern the administration of these programs. These priorities are defined as Preferences and were developed in an attempt to try to provide help to those applicants in greatest need.)

1. PREFERENCE

- a. Applicants who are involuntarily displaced.
- b. Applicants who are living in substandard housing.
- c. Applicants who are paying in excess of fifty percent of their family income for rent

Ranking of the preferences is as follows:

All of the Federal Preferences are equally weighed and have equal priority over non-Preference applicants. There is no additional priority for multiple preferences.

Verification Requirements of Preferences Categories

In order to be eligible to apply and to qualify for a preference and sufficient documentation must be provided by the applicant prior to qualification. Applicants may provide additional documentation while on the waiting list that may improve their ranking.

VERIFICATION OF INVOLUNTARY DISPLACEMENT: Includes the following documentation:

- a. certification from a unit of government concerning displacement due to disaster,
- b. certification from a unit of government concerning displacement due to code enforcement or public improvement/development,
- c. certification from an owner concerning displacement due to owner action,
- d. certification from local police, social service agency, court, clergyman, physician, or public/private shelter/counseling facility concerning displacement due to domestic violence.
- e. certification by law enforcement agency concerning displacement to avoid reprisals for providing information on criminal activities.
- f. certification by law enforcement agency concerning displacement due to hate crimes.

- g. certification by owner, social service agency, or physician concerning displacement due to the inaccessibility of the apartment unit.
- h. certification by HUD officials concerning displacement because of HUD disposition of multi-family project.

Further clarification of Involuntary Displacement: An applicant family who is evicted for reasons within their control is not considered displaced.

VERIFICATION OF SUBSTANDARD HOUSING:

Includes certification from a unit of government or from the applicant's current landlord that unit's condition meets the definition of substandard. For "homeless families", verification is certification from a public/private facility providing shelter to the family, or from local police or a social service agency.

Further clarification of Substandard Housing: The definition of "substandard housing" is not restricted to units that have been condemned.

Substandard housing is not housing that may have one or more Housing Quality Standard violations.

VERIFICATION OF PAYING MORE THAN 50% OF INCOME TOWARDS RENT:

- a. A copy of a current lease agreement or suitable third-party verification through the landlord directly from the current lease holder who is making application;
- b. The last three rent receipts, cancelled checks or money orders,
- c. Income will be verified in accordance with already existing Contractor procedures used to verify income to determine eligibility and Total Tenant Payment.

An application is considered incomplete unless an applicant has provided social security cards for all household members 6 years or older. In addition, form HUD-9886(7/94) Authorization for the Release of Information/Privacy Act Notice must be signed by all family members 18 years of age or older.

Applicants who already reside in government assisted units will not be disqualified from applying for the South Windsor Housing Authority's waiting list. The applicant must meet the priority criteria or be able to demonstrate that their present subsidized housing conditions are not suitable.

Periodically the Contractor conducts mailings to purge inactive applicants from the waiting list. Applicants will be removed from the waiting list when they have not maintained a current mailing address with our office or when correspondence to them is unanswered. An exception will be when an applicant has demonstrated that they have a disability that prevented them from responding to our correspondence.

Prior to removing an applicant's name from the waiting list, we will examine the applicant's file to ensure that we have exhausted all reasonable means to contact them before we remove the applicant from the waiting list.

When it is determined that there are openings on the program, a letter is sent to the next eligible applicant from the waiting list regardless of the bedroom size that the applicant needs. The letter explains the papers needed in order to document eligibility, i.e., pay stubs, welfare budget sheets, social security award letters, savings account books, daycare receipts, etc. The family is assigned to a Program Supervisor who certifies the family's eligibility and issues the Certificate or Housing Voucher.

An applicant's income status may change while on the waiting list. Occasionally, a family who has been contacted for the purposes of enrollment may no longer meet the income eligibility requirements. When this happens, the reasons are fully explained by the Contractor's Program Supervisor at the time of the enrollment interview. Ineligible applicants may request an appeal with the Program Director for further clarification.

Applicants may obtain their numerical position on the waiting list by requesting it in writing or in person. The request must include the applicant's name, current address and social security number. All requests will be responded to in writing promptly. This waiting list information will not be provided to applicants via the telephone or in person for security concerns. Once on the waiting list, it is the applicant's responsibility to maintain their current address. Failure to do so may result in removal from the waiting list. Update of applicant's address must be done in writing or in person.

D. Verification of Income and Determination of Total Tenant Payment

Verification of income will be obtained by either third-party verification or using documentation provided directly by clients.

Accuracy of calculations of Total Tenant Payments is ensured through the following methods; computer software is programmed to make correct calculations of entered data. The Contractor has Program Supervisors who review calculations of all executed HAP contracts, as well as a random sampling of case files is audited to ascertain among other things that the Total Tenant Payment is calculated accurately.

Verification of income and determination of Total Tenant Payment will follow program regulations as identified in 24 CFR 813 with the following issues further defined:

Families or individuals claiming zero income will need to report income status quarterly.

All interim changes of family income or household composition must be reported to the housing agency as an interim reexamination. Interim reexamination will be processed for the next month in which the change became effective. If changes of income occur frequently, the housing agency reserves the right to review household income changes in terms of a yearly average so as to excuse program participants from excessive reporting.

E. Briefing of Families and Issuance of Certificate and Housing Voucher

If a person is determined to be eligible by the Contractor and is selected for participation, the applicant will be notified of an orientation meeting.

The applicant may be offered either a Section 8 Certificate or Housing Voucher whichever is available at the time of the offer. Applicants have the option of refusing one type of subsidy and remain on the waiting list for the availability of the other type of subsidy.

When a family initially receives its Certificate or Housing Voucher, a full explanation of the following shall be provided to assist the family in finding a suitable unit and to apprise the family of its responsibilities and the responsibilities of the owner.

Full opportunity shall be provided to the families to ask questions and receive answers. The Certificate/Housing Voucher Holder's packet shall include the following:

1. A guide booklet to the Section 8 Certificate and Housing Voucher program (Appendix II) which includes information pertaining to the following:
 - a. Term of the certificate/voucher and policy regarding extensions or suspensions.
 - b. How the housing assistance payment is calculated.
 - c. Utility Allowance Schedule and information on the Fair Market Rents (FMR) for

Certificate program and Utility Allowance Schedule and information on the Payment Standard.

- d. What the family should consider in deciding whether to lease a unit.
- e. Informal hearing procedures.
- f. Information on how to select unit similar to the HUD brochure on how to select a unit.
2. Mobility Program Notice explaining where a family may lease a unit.
3. The HUD-required "Lease Addendum".
4. The "Request for Lease Approval" form.
5. The policy on providing information about a family to prospective owners.
6. The subsidy standards.
7. The HUD lead-based paint (LBP) form.
8. Housing discrimination complaint form HUD-903 (2/89) and HUD 928.1 (3-89) form.
9. A listing of available apartment units. (Including handicap accessible units if applicable.)
10. A list of the obligations of being a participant of the Section 8 Certificate and Voucher program and grounds for termination of assistance.
11. Protect Your Family From Lead In Your Home Booklet

Information is provided to prospective owners regarding participating families in the following manner; upon request the Contractor will give prospective owners the family's current address and if known, the name and address of the owner at the family's current and prior address.

The Contractor may also provide any tenancy history that involves eviction action initiated against the family. Or information pertaining to damage, vacancy and unpaid rent claims paid out on behalf of the family.

After the Certificate or Voucher has been issued to the applicant, the Request for Lease Approval and prohibited Lease provisions are made available to the tenant or landlord on request or when necessary. Instead of handing out these forms routinely, the Contractor has developed a model lease for use by landlords and tenants. This model lease abides by the prohibited lease provisions and most landlords make use of it, although it is not required. This has helped the Contractor to eliminate, when appropriate, the additional burden on the tenant of completing the request for lease approval with the potential landlord and presenting the form to the Contractor. The essential information can instead be provided by telephone or in person.

If families believe that they have been discriminated against on the basis of race, color, national origin, sex, disability, or familial status, the Contractor will assist them in filling out HUD 903 (Housing Discrimination Compliant form) and will forward it immediately to the State Commission on Human Rights and Opportunities or the Department of Housing and Urban Development Regional Office in Boston.

F. Expiration and Extension of Certificate and/or Voucher

The Certificate and/or Housing Voucher shall expire at the end of sixty (60) days unless within that time the family locates an apartment unit. The inspection of the apartment need not occur prior to Certificate or Voucher expiration but must occur within a reasonable time period.

If a Certificate or Voucher expires or is about to expire, a family may submit the Certificate and/or Voucher to the Contractor with a request for an extension. If the applicant has demonstrated a good faith effort to secure an apartment unit, the Contractor may grant one or more extensions not to exceed a total of sixty (60) days, provided the Contractor determines that the family's failure to find a suitable unit is not due to the fault or lack of diligence of the family.

The Certificate holder or Voucher holder may request that the expiration period of their Certificate or Voucher be suspended. To be eligible for consideration the request must be for a documented medical reason or for a family emergency nature to justify the inability of the participant to make use of the Certificate or Voucher during that time period. Request will be reviewed on a case by case basis. The suspension request can not exceed 120 days.

G. Subsidy Standards

To avoid overcrowding and prevent waste of space and program funds, units shall be leased in accordance with the subsidy standards set below. The subsidy standards pertain to all cases with the exception that we will approve a unit that may be too large for the family's needs provided that the gross rent does not exceed the fair market rent for the smaller size unit as stated in the family's certificate.

The family's unit size shall be determined using the following criteria:

1. The bedroom size assigned shall provide for the smallest number of bedrooms needed to house a family without overcrowding.
2. The bedroom size assigned shall not require more than two persons to occupy the same bedroom.
3. The bedroom size assigned shall not require persons of the opposite sex other than husband and wife to occupy the same bedroom with the exception of infants and very young children.
4. The bedroom size assigned may be increased to a larger size than the family would ordinarily need if there is a documented medical reason that adequately supports the need for a larger size unit.

5. The family has the option to select a smaller-sized unit provided there is at least one bedroom of appropriate size for each two persons in the household. (For example, a two-bedroom certificate holder with a mother with an infant may select a one-bedroom unit.) For the Voucher Program, the payment standard that is used for the family will be the lower of the payment standard for the family unit size or the payment standard for the unit rented by the family.
6. Provided there is adequate documentation, a child who is temporarily away from the house because of placement in foster care will be considered a member of the family for purposes of determining the family unit size.
7. A pregnant women will be treated as a two-person family.

<u>Number of Bedrooms</u>	<u>Number of Persons</u>	
	<u>Minimum</u>	<u>Maximum</u>
0	1	1
1	1	2
2	2	4
3	3	6
4	5	8
5	8	10

H. Housing Quality Standards and Inspections

The Contractor will use the guidelines delineated in 24 CFR 982.401 as the appropriate Housing Quality Standards.

Before approving a lease, the Contractor shall inspect the unit for compliance with the Housing Quality Standards. The inspection will be made as quickly as possible, but no later than ten (10) days after the owner's request.

If there are violations which must be corrected in order for the unit to be decent, safe and sanitary, the owner and tenant shall be advised by the Contractor of the work required to be done. Before a contract is executed, the unit will be reinspected to ascertain that necessary work has been performed and that the unit meets the Housing Quality Standards. The Assistant Director maintains a report to monitor Housing Quality Standards violations and the noncompliance sanctions.

Disapproval of Owner

The Contractor reserves the right to deny approval to lease a unit from an owner for any of the following reasons:

1. The owner has violated obligations under a housing assistance payment contract under Section 8 of the 1937 Act.
2. The owner has committed fraud, bribery or any other corrupt or criminal act in connection with any federal housing programs.
3. The owner has engaged in drug-trafficking.
4. The owner has a history or practice of noncompliance with the HQS for units leased under the tenant-based programs or with applicable housing standards for units leased with project-based Section 8 assistance or leased under any other federal housing programs.
5. The owner has a history or practice of renting units that fail to meet State or local housing codes.
6. The owner has not paid State or local real estate taxes, fines or assessments.

Lease Approval and Housing Assistance Payments Contract Execution

The Contractor shall forward to the South Windsor Housing Authority all contracts for initial execution. Contract renewals will be executed by the Contractor.

Security Deposit

There is no limit on the amount of security deposit that owners can collect from Section 8 Certificate and Housing Voucher tenants other than what Connecticut State law imposes. Which is two month's rent unless the tenant is 55 years of age or older than the amount is one month's rent.

Housing Voucher Program

The Contractor shall reserve the right to disapprove a lease under the Housing Voucher program for a rent that is not comparable to private market unassisted units, as well as gross rents that would represent an excessive rent burden on the Voucher holder. For the purposes of this review, excessive burden on the Voucher holder is defined as Contract Rents that would require the Voucher holder to pay more than forty percent of their monthly income toward rent and utilities.

Payment Standards

The Housing Agency will set up an applicable payment standard schedule for each bedroom size in accordance with HUD regulations. The HA may establish an adjustment standard schedule on an annual basis in order to assure continued affordability for participating families. The amounts on the adjustment standard schedule can be any amount not less than 80 percent below the Fair Market Rent and not more than the Fair Market Rent. If the HA has a HUD approved 20 percent exception rent over the FMR, it may opt to use this amount.

Administration and Approval of the Over-FMR Tenancy (OFTO)

Approval of Over-FMR Tenancy (OFTO) will be granted on a case by case basis. First consideration for OFTO will be for those program participants with a disability, who need OFTO to meet reasonable accommodation requirements (i.e. Section 100.204 CFR, which states that reasonable accommodations must be made to afford a handicapped person equal opportunity to use and enjoy a dwelling unit).

Additional factors that will be considered when reviewing the program participants' request for OFTO include the program participant's documented effort to attempt to use the regular certificate and their inability to find suitable housing. Bedroom sizes that are particularly short in supply based on Housing Agency data of unused certificates will also provide consideration, as well as, providing greater housing opportunities for program participants.

Approval of OFTO will require manager approval and will be tracked to assure conformance with 10% HUD limit. For OFTO clients, the family share (family paid portion of gross rent) must leave at least 50 percent of adjusted income to meet other family expenses or the rent amount can not be approved. The definition of family share includes tenant paid utilities or Total Tenant Payment (TTP). TTP divided by monthly adjusted income can not exceed 50%. If the TTP divided by the monthly adjusted income is between 40% to 49%, the clients will be counseled on the difficulty of having an excessive rent burden, but the client will not be prevented from pursuing the apartment unit.

Review and Adjustment of Allowances for Utilities

The HA shall at least annually determine whether there has been a substantial change in utility rates or other charges of general applicability and whether an adjustment is required in the allowance for utilities and other services by reason of such change or because of errors in the original determination. The procedure for this determination shall be:

The HA will request estimates from utility and heating companies. If the HA determines that an adjustment should be made, the HA shall establish a schedule of adjustment taking into account size of dwelling unit and other pertinent factors.

I. Payment to Owners

The Contractor's staff submit the applicable HUD form to the accounting staff which processes the information in the computerized payment system. The Contractor also has written Program Controls which were developed to minimize exposure to abuse of the Certificate and Housing Voucher funds by staff, landlords and tenants, and to maintain the integrity of the program data (see Appendix III for Program Controls).

J. Review of Family Circumstances, Rents, Utilities and Housing Quality Standards.

The Contractor's Director or Assistant Director of the program assigns annual re-examinations two months prior to each lease anniversary date, based on a computer generated monthly report intended for such purposes. The Contractor's Program Representatives thereby have sufficient opportunity to notify, in writing, both the owner and the tenant. Should either party have issues to resolve, there is then adequate time to explore the issues, and to work toward their resolution prior to the expiration of the lease.

Changes in tenant income are processed upon verification throughout the lease term. All tenants who report zero income are asked to certify their income status at least every three months.

As detailed above, the Contractor will assign new cases, as well as annual recertifications, to Program Representatives. The Program Representative inspects as well as determines tenants continued eligibility and payment amounts.

Reinspection is done as required by the Program Representative or as requested by the tenant or owner.

At annual reinspections or during the lease term, should the apartment fail an inspection, the following will occur:

- a. The owner is notified in writing as to the deficiencies. The owner is given a time period, determined by the Program Representative in which to make the necessary repairs. If the deficiencies are serious the family is issued a new Certificate and advised to relocate. The Assistant Director will maintain a report to monitor HQS violations and the noncompliance sanctions.

Program Representatives may abate all or part of the housing assistance payment if the owner is failing to supply contracted services. The Program Representative may hold the housing assistance payment until the repairs are made.

- b. If the repairs are made within the specified time, the payment will be released.
- c. If the repairs are not made, the Program Representative may continue to withhold payments, abate the payments, or notify the owner of the termination of the contract, and issue the tenant a Certificate. The participating family will be reinstated on the program when another apartment is secured and satisfactorily passes inspection within the time prescribed on the

Certificate or Voucher.

The Assistant Director maintains a record of all requested repairs. The completion dates are monitored monthly to ensure that reinspection deadlines are met or if not, then the appropriate administrative sanctions are taken. Before monthly housing assistance payments are made, all repairs that are requested are reviewed to ensure that the Program Representatives follow through on administrative sanctions. In the instance where monies need to be recovered from participating families or program landlords, the attached Program Controls (Appendix III) should outline HA policy on this matter.

Family Break-up

In the event that a family break-up occurs in an assisted household, the Contractor will review the following factors to determine which members of the family continues to receive assistance in the program:

1. The interest of minor children or ill, elderly or disabled family members.
2. Whether family members are forced to leave the unit as a result of actual or threatened physical violence against family members by a spouse or other member of the household.
3. Which family member has recognized custody of minor children in family.

Absence from Unit

The family may be absent from the unit for brief periods. For longer absences the following HA policy shall apply:

Absence is defined as no family member residing in the unit.

Family members need to notify the Contractor of any extended absence from the unit and the reason for the absence. The Contractor may require the family to document the reason for the extended absence. In any event, family members may not be absent from the unit for a period of more than 60 consecutive calendar days.

Housing Assistance Payments terminate if the family is absent for longer than the maximum period permitted. The term of the HAP Contract and the assisted lease also terminate.

The Contractor reserves the right to consider special circumstances (such as absence due to hospitalization, medical emergency, etc.) as a basis to determine whether the Contractor may want to allow a resumption of assistance to the family. The family must supply any information requested by the Contractor to verify the special circumstances.

The Contractor conducts a random mailing to a sample of all program participants to verify

continued occupancy. The random mailing is described more fully in the Program Controls document.

K. Termination Policy and Procedure

The following will constitute grounds for removal of a tenant from Section 8 Certificate and Housing Voucher programs or deny assistance for an applicant:

1. Failure to make payments for monies owed the HA or another HA.
2. Violation of any of the family obligations under 24 CFR 982.551.
3. A participant or family member engaged in drug-related criminal activity or violent criminal activity.
4. A participant has committed fraud (bribery or any other corrupt or criminal act) at the time of application or during assisted tenancy.
5. A participant has failed to comply with the requirements under the family's contract of participation in the Family Self-Sufficiency program.
6. If any family members of the family has been evicted from public housing.
7. If the family has engaged in or threatened abusive or violent behavior toward HA personnel.

Procedure

The following is the procedure by which a Section 8 tenant can be removed:

- (1) The tenant and landlord will be mailed a notice of intent to terminate Section 8 benefits. The notice shall state the grounds for removal. It shall advise the tenant that they have 10 days in which to respond and contest the action by requesting a hearing.
- (2) The tenant may have an advocate or attorney present at the hearing.
- (3) If the tenant does not respond, they may be automatically removed from the program effective the first day of the month coming after the date of the notice. Notice of termination will be sent to the tenant and landlord simultaneously.

L. Complaints and Appeals

Informal Hearings for Applicants

The Contractor will provide an applicant an opportunity for an informal review of a decision denying an applicant:

1. listing on the waiting list, and/or
2. participation in the program.

The Contractor shall give the applicant written notification of its decision denying assistance. The notice shall:

1. be given personally to the applicant or member of the family or sent by first class mail to the last known address;
2. give a brief statement of the reasons for the decision, and
3. inform the applicant that within ten (10) days of the date of the notice, the applicants may request, in writing, that an informal hearing be held to present objections and review the decision.

Informal Hearing for Participants

The Contractor will provide an opportunity for an informal hearing to a participant to consider whether decisions relating to the individual circumstances of the participant are in accordance with HUD regulations and the Contractor rules in the following situations:

1. A determination of the amount of total tenant payment or tenant rent. This requirement does not apply to utility allowance schedules.
2. A decision to deny or terminate assistance.
3. A determination that a participant is residing in an overcrowded or under utilized unit.
4. In the case of a participant who wants to move to another dwelling unit, a determination of the number of bedrooms to be entered on a certificate when a participant family desires to move to another unit.

Conduct of Hearings

If an applicant or participant requests an informal hearing within the time frame set forth above, the HA shall conduct a hearing in accordance with the following procedures:

1. The Contractor shall appoint a hearing officer to conduct the hearing who must be an employee or outside person other than the person who made or approved the decision under review or a subordinate of such person.
2. The hearing officer shall issue a written decision stating briefly the factual and other basis for the decision, a copy of which shall be furnished promptly to the applicant.

PROGRAM MANAGEMENT STAFF

NAME	TITLE	POSITION
Arthur T. Anderson	President	Supervisory
Donald P. Walsh	Vice President	Supervisory
James Almon	Controller	Chief Financial Officer
Kenneth G. Schultz	Director	Supervisory
Vicente Ithier	Assistant Director	Supervisory
Stella Butler	Assistant Director	Supervisory
Maria D. Santos	Executive Assistant	Supervisory
Emily L. Clark	Program Representative	Line Staff
Jesus Morales	Program Representative	Line Staff
Carole Taliaferro	Program Representative	Line Staff
Caroline Morales	Program Representative	Line Staff
Jennifer Albert	Program Representative	Line Staff
Carmen Morales	Program Representative	Line Staff
Kent Pellitier	Program Representative	Line Staff
Lavine Johnson	Program Representative	Line Staff
Yvette Clay	Program Representative	Line Staff
Alfred Gerena	Program Representative	Line Staff
Melissa Valdes	Administrative Assistant	Office Support
Marcela J. Espejo	Administrative Assistant	Office Support
Joy Girard	Payment Production Coordinator	Accounting
Ivette Soto	Payment Assistant	Accounting
Fred Gerena	Support Staff	Accounting
Patti Wirth	Support Staff	Accounting
Jack Hamilton	Support Staff	Legal
Jack Hamilton	Support Staff	Hearing Officer
Maxine Thomas	Support Staff	Telephone Support

- Develop a handicap accessible handout for interested clients with a comprehensive listing of known units (not necessarily vacant).

2. Program staff could benefit from ongoing training regarding fair housing laws and responsibilities.

Continue to ensure that program staff is properly trained regarding fair housing laws and responsibilities using the following strategies:

- Identify fair housing agencies offering fair housing training and orientation for program staff.
- Continue to gather information from organizations and agencies involved with fair housing and distribute to program staff to program participants.
- Reserve time at regularly scheduled program staff meetings to discuss fair housing issues.
- Ensure adequate fair housing training for program staff by attending fair housing seminars.

3. If payment standard is not set at a high enough rate then it limits the number of housing choices for program participants.

Routinely review payment standard levels to determine the appropriate level that maximizes both adequate housing choices without reducing total number of rental subsidies using the following strategies:

- Maintain payment standard levels equal to 100% of published fair market rent or greater.
- Develop rental survey data to review the adequacy of payment standard levels.
- Track rental information on cases where apartment units became ineligible for program participation due to rent being too high for client. Compile this information and analyze to determine if higher payment standards are necessary.

4. Program Participants don't always report housing discrimination that they may encounter or are unwilling to take further action when they do report housing discrimination (they may complain about encountering discrimination but are unwilling to take action).

Develop further strategies to ensure program participants consider reporting housing discrimination and are properly informed regarding their rights under fair housing laws using the following strategies:

- Ensure that updated fair housing material is provided to program participants during orientation.
- Develop office procedures to have program staff record basic facts surrounding any reported incident of housing discrimination (whether further action was taken or not taken).
- Develop a system to maintain a central file where reported incidents of housing discrimination are gathered and review routinely to identify patterns or possible follow-up action.

5. Improved fair housing compliant process including a full understanding of appropriate complaint referral procedures.

Develop further strategies to improve the fair housing complaint process and referral procedures:

- Assign a specific staff person to coordinate fair housing activities.
- Develop a formal process for referring fair housing complaints to appropriate agencies.
- Commit to conducting an analysis of the impediments to fair housing choice on an annual basis and include member(s) of the resident advisory board in the process.

6. The general lack of affordable rental units in the market creates impediments to fair housing choice, particularly for those families searching for larger size apartment units.

Develop strategies to counteract the general lack of affordable rental units for families searching for larger size units:

- Affirmatively market the Section 8 tenant based program to local landlords to dissemination of information to local landlords.

Fair Housing Action Points

		Target Date	Person Respon.
1.	· Coordinate identification and dissemination of known or available handicap accessible units and maintain in ongoing file.	Ongoing	SMB
2.	· Identify possible agencies that might have listings of handicapped accessible units.	2/28/00	SMB
3.	· Have program staff identify handicap accessible units through normal program operation and forward information to staff person responsible for maintaining list. · Announce at staff meetings.	Ongoing 2/28/00	SMB SMB
4.	· Ensure that property owners that list vacant apartments are screened to determine if the units are handicap accessible and if so identify them in that manner. · Maria remind support staff	Ongoing	MS
5.	· Develop a handicap accessible handout for interested clients with a comprehensive listing of known units (not necessarily vacant).	2/18/00	SMB
6.	Ongoing Staff Training Action Points · Annually devote one staff meeting to fair housing training from outside source. · Add "fair housing discussion" to regular staff meeting agenda, also use time to distribute fair housing material. · Search fair housing training seminars for staff to attend.	4/18/00 2/18/00 ongoing	SMB SMB SMB
7.	· Conduct needs assessment and self-evaluations on a ongoing basis but at least annually (every January) · Include participation of resident advisory board · Review State of Connecticut analysis of impediments to fair housing choice	1/31/01 1/31/01 1/31/01	SMB SMB SMB
8.	· Develop rental survey data. · Track rental information on cases were apartment units became ineligible for program participation due to rent being to high for client. Compile this information and analyze to determine if higher payment standards are necessary.(Announce at staff meeting)	5/1/00 ongoing	VI SMB
9.	· Continue to review additional fair housing handout information to consider handing out or making available to program participants. · Develop a form to provide to program staff to record basic facts surrounding any	Ongoing 4/18/00	SMB SMB

	<p>reported incident of housing discrimination (whether further action was taken or not taken). (Discuss with staff at staff meeting).</p> <ul style="list-style-type: none"> Develop a file to maintain reported incidents of housing discrimination are gathered and review routinely to identify patterns or possible follow-up action. 	4/18/00	SMB
10.	<ul style="list-style-type: none"> Develop a formal process for referring fair housing complaints to appropriate agencies. Develop written handout to staff and clients explaining various options. 	5/18/00 5/18/00	SMB SMB/KS
11.	<ul style="list-style-type: none"> Develop system to flag clients due for recertification who are disabled or handicap who have requested a home-visit. 	2/28/00	SMB
12.	<ul style="list-style-type: none"> Research 24CFR 8.4, 8.24, 8.23(b)(1) and 8.33 "PHA to pay for modifications?" 	2/28/00	KS/SMB

Program Rep. *Pellitier*
Program Rep. *Taliaferro*

