

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

PHA Plans

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

**PHA Plan
Agency Identification**

PHA Name: Municipal Housing Agency of Council Bluffs, Iowa

PHA Number: IA 023

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— Regal Towers, 505 south 6th Street,
during normal business hours.

Display Locations For PHA Plans and Supporting Documents

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

Main administrative office of the PHA— Regal Towers

PHA Plan Supporting Documents are available for inspection at:

Main business office of the PHA— Regal Towers

5-Year Plan
PHA Fiscal Years 2000 - 2004
[24 CFR Part 903.5]

A. Mission

State the PHA's mission for serving the needs of low-income, very low income, and extremely low-income families in the PHA's jurisdiction.

- It is the mission of the Municipal Housing Agency to provide, promote, and support affordable housing that is decent, safe, and sanitary. It is the mission of the agency to practice and promote equal opportunity in housing. It is the mission of the agency to practice professionalism in all activities.

B. Goals

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: Increase Section 8 Voucher rate.
- PHA Goal: Improve the quality of assisted housing
Objectives:
- Improve public housing management: (PHAS score)
 - Improve voucher management: (SEMAP score)
 - Increase customer satisfaction: Section 8 participating property owners
 - 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: when Public Housing units are sold.
 - Provide replacement vouchers:
 - Other: Modernize Public Housing in a timely manner:
Increase customer satisfaction to Section 8 participating property owners:
- PHA Goal: Increase assisted housing choices
Objectives:

- Provide voucher mobility counseling:
- Conduct outreach efforts to potential voucher landlords
- Increase voucher payment standards to 110 %
- Implement voucher homeownership program:
- Implement public housing or other homeownership programs:
- Implement public housing site-based waiting lists:
- Convert public housing to vouchers:
- Other: Construct replacement housing for any Public Housing units sold.

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:

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: Continue to offer the Family Self Sufficiency Program to Section 8 program participants.

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:

- PHA Goal: Comply with the QHWRA of 1998
- Nominate a PHA resident to become a member of the MHA Board by August 1, 2000.

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

The Annual Plan and related 5 Year Plan are conditions of the Quality Housing and Work Responsibility Act of 1998. Accordingly, agency staff have produced the Plans for submission to the Department of Housing and Urban Development by December 1, 1999.

Several actions have been taken by the agency during preparation of the Plans: 1. Resident Housing Advisory Boards have been identified; provided summaries of the Plans; and, have participated in open discussions with the Executive Director prior to production of the final documents. 2. The agency scheduled and held a public hearing, advertised in compliance with applicable regulations. 3. A copy of the Plans was provided to the Local Official charged with production of the Consolidated Plan to insure consistency. A copy of the Certification of Consistency is part of this summary. 4. Copies of draft Plans were made available to the public in late September, and remain available for public review at agency administrative offices at Regal Towers Apartments, along with referenced policies covering agency operations.

The chief goal of the agency in 2000 is to increase the utilization rate of Section 8 Vouchers. This program has been handicapped by a tight housing market and lagging Fair Market Rents. The agency recently increased the Payment Standards in the Voucher Program to 110% of the Fair Market Rents. Agency personnel plan to meet more often with potential Section 8 participating property owners in the year ahead.

On November 11, 1999, the Board of Commissioners reviewed the final draft of the Five Year and Annual Plans and approved them for submission to the Department of Housing and Urban Development.

Mark Schultz, Executive Director
Municipal Housing Agency of Council Bluffs, Iowa

iii. Annual Plan Table of Contents

Table of Contents

- i. Annual Plan Type**
- ii. Executive Summary**

iii. Table of Contents

1. Housing Needs	Pages	1-6
2. Financial Resources	Pages	6-8
3. Policies on Eligibility, Selection and Admissions P.H.	Pages	8-12
4. Policies on Eligibility, Selection and Admissions Section 8	Pages	12-16
5. Rent Determination Policies P.H.	Pages	16-18
6. Rent Determination Policies Section 8	Pages	18-19
7. Capital Fund Statement	Pages	20-22
8. Homeownership	Pages	23-25
9. Community Services & Self Sufficiency Programs	Pages	25-26
10. Welfare Benefits Reductions	Pages	27-28
11. Fiscal Audit	Page	28
12. Other Information		
A. Resident Advisory Board Recommendations	Pages	28-29
B. Description of Election Process	Pages	29-31
C. Statement of consistency with Consolidated Plan	Pages	31-32
D. Attachments :	Pages	32-34
A. Supporting Documents Available for Review		
B. Statement of Non Discrimination and Privacy		
E. Attachments Sent Separately by Mail:		
A. Council Bluffs Community Development Certification of Compliance with the PHA Plans and Related Regulations		
B. Signed MHA Board Approval, Certification and Agreement Resolution for the Five Year Plan		

1. Statement of Housing Needs

[24 CFR Part 903.7 9 (a)]

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

Housing Needs of Families in the Jurisdiction by Family Type

Family Type	Overall	Afford-ability	Supply	Quality	Assess-ability	Size	Location
Income <=30% of AMI	90%	5	5	5	4	4	4
Income >30% but <= 50% of AMI	75%	4	4	4	3	4	4
Income >50% but <= 80% of AMI	45%	3	3	3	3	3	3
Elderly	35%	4	4	4	4	4	4
Families with Disabilities	65%	4	5	4	5	4	4
Race/Ethnicity- Native American	45%	4	4	4	3	3	3
Race/Ethnicity- Asian	45%	4	4	4	3	3	3
Race/Ethnicity- Black	45%	4	4	4	3	3	3
Race/Ethnicity- White	35%	3	3	3	3	3	3

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: 1999 to 2000. However, some of the data were nine years old in Consolidated Plan.
- U.S. Census data: the Comprehensive Housing Affordability Strategy ("CHAS") dataset
American Housing Survey data
Indicate year:
- Other sources: MHA requested information on Housing needs from eight Council Bluffs Agencies who serve various populations of very low to low income people.

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

Housing Needs of Families on the Waiting List (Sept. 20, 1999)

Public Housing Waiting List	# of families	% of total families	Annual Turnover
Waiting List Total	118		59
Extremely low income < 30% AMI	78	66%	
Very low income (>30% but < 50% AMI)	31	26%	
Low income (>50% but < 80% AMI)	9	8%	
Families with children	0	0%	
Elderly families	92	78%	
Families with Disabilities	26	22%	
Race/ethnicity -- Black	2	2%	
Race/ethnicity -- Asian	1	1%	
Race/ethnicity -- Latino	2	2%	
Race/ethnicity -- White	113	95%	
Characteristics by Bedroom Size			
1 Bedroom	118	100%	59
2 Bedroom	0	—	—
3 Bedroom	0	—	—

Is the waiting list closed ? **No**

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? **Yes, Disaster Certified**

Housing Needs of Families on the Waiting List (Nov.29, 1999)

Section 8 Tenant-based Assistance	# of families	% of total families	Annual Turnover
Waiting List Total	370		
Extremely low income < 30% AMI	320	86 %	
Very low income (>30% but < 50% AMI)	50	14 %	
Low income (>50% but < 80% AMI)	-0-	-0-	
Families with children	319	86 %	
Elderly families	49	14 %	
Families with Disabilities	included with Elderly		
Race/ethnicity – American Indian- not Alaskan	5	1 ½ %	
Race/ethnicity – Asian	3	1 %	
Race/ethnicity – Black	20	5 ½ %	
Hispanic	6	1 ½ %	
Race/ethnicity – White	336	90 %	

Is the waiting list closed ? **Yes** If yes: How long has it been closed ? **13 months**

Does the PHA expect to reopen the list in the PHA Plan year? **Yes**

Does the PHA permit specific categories of families onto the waiting list, even if generally closed? **Yes, Disaster Certified**

C. Strategy for Addressing Needs

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:

- 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: Maintain lease-up rates at public housing properties.

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

- 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: Construct affordable housing units to replace any Public Housing Sold.

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 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:

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

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

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

Need: Specific Family Types: The Elderly

Strategy 1: Target available assistance to the elderly:

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

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

- 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:

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
- Other:

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

Other:

(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

Limited availability of sites for assisted housing

Extent to which particular housing needs are met by other organizations in the community

available to the PHA

Community priorities regarding housing assistance

Results of consultation with local or state government

Results of consultation with advocacy groups

Other:

2. Statement of Financial Resources

Financial Resources: Planned Sources and Uses		
Sources		Planned Uses
1.		
a.) Public Housing Operating Fund		
b.) Public Housing Capital Fund		
c.) HOPE VI Revitalization		
d.) HOPE VI Demolition		
Tenant-Based Assistance	\$1,730,000	
Program (including any Technical Assistance funds)		

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
Sufficiency Grants	\$33,000	
Grant		
i.) HOME		
2. Prior Year Federal Grants (unobligated funds only)		
	\$27,000	Insulation at Regal Towers
	\$264,000	Various plants all locations
Income	\$657,000	
4. Other income		
Laundry Revenue		PHA Operations
Interest Income		Section 8 /PHA Operations
Total resources		Rental Assistance Section 8 /PHA Operations

[24 CFR Part 903.7 9 (c)]

A. Public Housing

a. When does the PHA verify eligibility for admission to public housing?

families are within a certain number of being offered a unit:

Other: _____.

b. Which non-income (screening) factors does the PHA use to establish eligibility for admission to public

Criminal or Drug-related activity

- Rental history
 - Housekeeping
 - Other : Attending Physicians and Therapists Reports and Opinions
- 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
- b. Where may interested persons apply for admission to public housing?
- PHA main administrative office
 - PHA development site management offices – Regal Towers
 - Other : and Dudley Court– Public Housing Apartment Complex for elderly and disabled.
- 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.

No site based waiting lists

(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?
- 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:

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

b. Transfer policies:

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

Emergencies

Over-housed

Medical justification

Administrative reasons determined by the PHA (e.g., to permit modernization work)

– 0 Bedroom \$250

1 Bedroom \$500

Handicap Accessibility

c. Preferences

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)

2. Which of the following admission preferences does the PHA plan to employ in the coming year?

Involuntary Displacement (Disaster, Government Action, Action of Housing

Victims of domestic violence

Substandard housing

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

Working families and those unable to work because of age or disability

Veterans and veterans' families

Those enrolled currently in educational, training, or upward mobility programs

Households that contribute to meeting income goals (broad range of incomes)

Victims of reprisals or hate crimes

Other preference(s):

1. Elderly and disabled families

2. Families with incomes at or below 30% of median when less than 40% of admissions are at that level on an annualized basis

3. **Admission Preferences. Numbers indicate the priority given preferences.**

Date and Time

Former Federal preferences:

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

4 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

2 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):

1. Elderly or Disabled Families

3. Families with incomes at or below 30% of median when less than 40% of admissions are at that level on an annualized basis

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

b. How often must residents notify the PHA of changes in family composition?

Any time family composition changes

At family request for revision

(6) Deconcentration and Income Mixing

a. Yes No

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

No Did the PHA adopt any changes to its **admissions policies**

required analysis of the need to promote deconcentration of poverty or to assure income mixing?

Adoption of site-based waiting lists

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

If selected, list targeted developments below:

Employing new admission preferences at targeted developments

If selected, list targeted developments below:

Other

d. Yes No **other** policies based on the results of the required

e. If the answer to d. was yes, how would you describe these changes?

Actions to improve the marketability of certain developments

Adoption or adjustment of ceiling rents for certain developments

ves to encourage deconcentration of poverty and income-mixing

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

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?

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

B. Section 8

(1) Eligibility

a. What is the extent of screening conducted by the PHA?

- 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

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— Name; Household Members; percent of rent share; Last known address & Owner name.

(2) Waiting List Organization

a. With which of the following program waiting lists is the section 8 tenant-based assistance waiting list merged?

- None
 Federal public housing
 Federal moderate rehabilitation
 Federal project-based certificate program
 Other federal or local program

b. Where may interested persons apply for admission to section 8 tenant-based assistance?

- PHA main administrative office
 Other: Section 8 Office

(3) Search Time

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

- 1. Unable to locate housing in 60 days
- 2. Illness

(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)
2. Which of the following admission preferences does the PHA plan to employ in the coming year?

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): 30% of median if new admissions are less than 75% of all admissions in a one year time period

3. **PHA Preferences(Section 8)** Numbered according to priority

5 Date and Time

Former Federal preferences

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

Other preferences

- 3 Working families and those unable to work because of age or disability
- Veterans and veterans' families
- 4 Residents who live and/or work in your jurisdiction— 12 Months or more.
- 3 Elderly or disabled whose head or spouse is receiving income based on inability to work (SSI or SS)
- 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) — 30% of median **if** new admissions are less than 75% of all admissions in a one year time period

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

- 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:

- 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?

- The Section 8 Administrative Plan
- Briefing sessions and written materials
- Other:

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

- Through published notices
- Other : Section 8 Newsletter, Section 8 Office Bulletin Board

4. PHA Rent Determination Policies

[24 CFR Part 903.7 9 (d)]

A. Public Housing

(1) Income Based Rent Policies

a. Use of discretionary policies:

- 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).

---or---

- The PHA employs discretionary policies for determining income based rent

b. Minimum Rent

1. What amount best reflects the PHA's minimum rent?

- \$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:

c. 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

- 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

e. Ceiling rents

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

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

2. For which kinds of developments are ceiling rents in place?

- 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

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

- 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

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:
- Other: Anytime the family composition changes.

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

In setting the market-based flat rents, what sources of information did the PHA use to establish comparability?

- 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 : Fair Market Rents

B. Section 8 Tenant-Based Assistance

(1) Payment Standards

Describe the voucher payment standards and policies.

These figures are taken from HUD published FMR and area average rents:

Bedrooms	Payment Standards
0	\$367
1	\$504
2	\$636
3	\$834
4	\$935

a. What is the PHA's payment 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 sub-market
- Other

c. If the payment standard is higher than FMR, why has the PHA chosen this level?

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

d. How often are payment standards reevaluated for adequacy?

- Annually
- Other : As necessary

e. What factors will the PHA consider in its assessment of the adequacy of its payment standard?

- Success rates of assisted families
- Rent burdens of assisted families
- Other: Voucher Utilization Rates
FMR

(2) Minimum Rent

a. What amount best reflects the PHA's minimum rent?

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

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

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.

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.

7. Capital Improvement Needs

[24 CFR Part 903.7 9 (g)]

A. Capital Fund Activities

(1) Capital Fund Program Annual Statement

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

Attachment (state name)

-or-



The Capital Fund Program Annual Statement is provided below:

CAPITAL FUND ANNUAL STATEMENT

PHA Plan Table Library

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

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

Capital Fund Grant Number IA 05P023708 FFY of Grant Approval: 2000



Original Annual Statement

Line No.	Summary by Development Account	Total Estimated Cost
1	Total Non-CGP Funds	0
2	1406 Operations	0
3	1408 Management Improvements	0
4	1410 Administration	\$10,000
5	1411 Audit	0
6	1415 Liquidated Damages	0
7	1430 Fees and Costs	\$9,000
8	1440 Site Acquisition	0
9	1450 Site Improvement	0
10	1460 Dwelling Structures	\$135,000
11	1465.1 Dwelling Equipment-Non-expendable	0
12	1470 Non-dwelling Structures	0
13	1475 Non-dwelling Equipment	\$81,000
14	1485 Demolition	0
15	1490 Replacement Reserve	0
16	1492 Moving to Work Demonstration	0
17	1495.1 Relocation Costs	0

Line No.	Summary by Development Account	Total Estimated Cost
18	1498 Mod Used for Development	0
19	1502 Contingency	0
20	Amount of Annual Grant (Sum of lines 2-19)	\$235,000
21	Amount of line 20 Related to LBP Activities	0
22	Amount of line 20 Related to Section 504 Compliance	0
23	Amount of line 20 Related to Security	34%
24	Amount of line 20 Related to Energy Conservation Measures	0

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

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
IA O23001 Regal Towers	1. Replace Identified Domestic Water Delivery Pipes	1460	\$125,000
	2. Replace Building fire Alarm System	1475	\$91,000
IAO23004 Dudley Court	No Projects Identified		
PHA Wide	Administration A& E	1410	\$10,000
		1430	\$9,000
Total			\$235,000

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

Development Number/Name HA- Wide Activities	All Funds Obligated (Quarter Ending Date)	All Funds Expended (Quarter Ending Date)
IA023001 Regal Towers	12/31/2000	12/31/2001
PHA Wide	12/31/2000	12/31/2001

MHA does not anticipate application for HOPE VI funds because the agency does not have projects in need of revitalization. The agency may produce Public Housing to replace any scattered site Public Housing units sold.

(2) Optional 5-Year Action Plan

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

b. If yes to question a, select one:

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

-or-

The Capital Fund Program 5-Year Action Plan is provided below:

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

Yes No a) Has the PHA received a HOPE VI revitalization grant? (if no, skip to question c)
b) Status of HOPE VI revitalization grant

1. Development name:

2. Development (project) number:

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

Revitalization Plan under development

Revitalization Plan submitted, pending approval

Revitalization Plan approved

Activities pursuant to an approved Revitalization Plan underway

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

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

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

The MHA will replace any Public Housing units sold under the 5(h) program

8. Demolition and Disposition

[24 CFR Part 903.7 9 (h)]

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)

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)]

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. **PHAs completing streamlined submissions may skip to component 10.**)

10. Conversion of Public Housing to Tenant-Based Assistance

[24 CFR Part 903.7 9 (j)]

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

1. Yes No Have any of the PHA's developments or portions of developments been identified by HUD or the PHA as covered under section 202 of the HUD FY 1996 HUD Appropriations Act? (If "No", skip to component 11) (**PHAs completing streamlined submissions may skip to component 11.**)

11. Homeownership Programs Administered by the PHA

[24 CFR Part 903.7 9 (k)]

A. Public Housing

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 "yes", complete one activity description for each applicable program/plan, **unless eligible to complete a streamlined submission due to 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: Scattered Sites
1b. Development (project) number: IA05PO23008

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

2. Federal Program authority:

- HOPE I
 5(h)
 Turnkey III
 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:
(21/12/1998)

5. Number of units affected:

6. Coverage of action:

- 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 ?
(**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:

Completion of FSS Program— reaching self sufficiency.

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.

A. PHA Coordination with the Welfare (TANF) Agency

1. Cooperative agreements:

Yes No Has the PHA has entered into a cooperative agreement with the TANF Agency, (FIP agency, DHS in Iowa) 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?

2. Other coordination efforts between the PHA and TANF agency

Client referrals

Information sharing regarding mutual clients (for rent determinations and otherwise with consents to release information from mutual participants)

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 :

Joint meetings with participant and program representatives from both agencies to coordinate plans for participant to become self-sufficient.

Both PHA and TANF (FIP in Iowa) agencies keep each other updated on changes to their requirements and programs.

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?

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

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?

Services and Programs

Program Name & Description	Estimated Size	Allocation Method	Access	Eligibility
Family Self Sufficiency Program. Section 8 Office	25-35	All on Section 8 are invited to participate as they are leased up with Section 8. They receive a newsletter twice a year with FSS information and general information. Again inviting them to enter FSS. They may enter at any time they are on Section 8 Housing Assistance	FSS Coordinator is located in the Section 8 Office. Those interested in the program simply set an appointment with FSS Coordinator.	All participants of Section 8 are eligible

(2) Family Self Sufficiency program/s

a. Participation Description

Family Self Sufficiency(FSS) Participation		
Program	Required Number of Participants (estimate at start of 2000)	Actual Number of Participants as of 9/1/99
Public Housing	0	0

Family Self Sufficiency(FSS) Participation		
Section 8	15	29

- 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:
- 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 (**FIP in Iowa**) agencies regarding the exchange of information and coordination of services
 - Establishing a protocol for exchange of information with all appropriate TANF (**FIP in Iowa**) agencies
 - Other: (list below)

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 Skip to component 15

14. Reserved for Pet Policy

[24cfr Part 903.7 9 (n)]

15. Civil Rights Certifications

[24 CFR Part 903.7 9 (o)]

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

16. Fiscal Audit

[24 CFR Part 903.7 9 (p)]

1. 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))? 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

17. PHA Asset Management

[24 CFR Part 903.7 9 (q)]

Exemptions from component 17: High performing are not required to complete this component.

18. Other Information

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:

- Attached at Attachment
 Provided below:

Public Housing: Resident Tenant Organization Officers from each of the two Public Housing complexes who select one resident each as a candidate for possible appointment by the Mayor to the Housing Agency Board of Directors for a two year term. Beginning on August 1, 2000.

Financial resources and their uses were reviewed. There was no comment on the Comp Grant because it is a process that usually begins in the Spring of the year and involves the entire Tenant Organization.

Discussion on Crime & Safety which centered on overall management of pets and resident concerns about strangers coming in the front door without use of the intercom system The problem is that the handicap accessible door must stay open for 11 seconds to allow time for a person in a wheelchair to enter

Section 8 : Concern about quality and availability of housing in C.B. for very low income families

Landlords taking advantages of very low-income families through the high rents they charge

Landlords need to work with Section 8 and landlord Assoc.

Need more affordable housing in C.B.

Agency needs to do more criminal checks on applicants for Section 8, so landlords will be more willing to rent to Section 8 participants. Landlords also need to check for criminals.

Landlords say they will rent to a section 8 participant and then turn around just before inspection and rent to someone on the open market.

Concerned that if she become Self Sufficient she would lose medical care, and rent will be higher, meaning she will not be able to provide for self and children.

At the same time she is embarrassed and depressed about having to receive Section 8 She does not want her children in the same boat of having to seek assistance.

3. In what manner did the PHA address those comments?

- 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: Some suggestions had previously been acted upon. New keys were distributed to residents when locks were changed and a request was made to residents to not allow visitors without keys to enter without calling the office for entrance. A camera security system was already in place. Some other comments concerns were already being added to activities the PHA is doing to increase available housing in C.B. – those to do with landlords

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:

- 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: Selected by Officers in Public Housing Tenant Organization. Section 8 a number of tenants were invited, only one showed up.

b. Eligible candidates:

- 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

c. Eligible voters:

- All adult recipients of PHA assistance (public housing and Section 8 tenant-based assistance)
- Representatives of all PHA resident and assisted family organizations
- Other: Mayor of city

C. Statement of Consistency with the Consolidated Plan

1. Consolidated Plan jurisdiction: THE OMAHA-COUNCIL BLUFFS CONSORTIUM
CONSOLIDATED SUBMISSION FOR COMMUNITY DEVELOPMENT PROGRAMS FOR
FISCAL YEARS 1999 TO 2002.

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction:

- 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. The Omaha-Council Bluffs Consortium Consolidated Submission for Community Development Programs for Fiscal Years 1999 to 2002.
- Other: Eight agencies responded to a request by PHA for data from their agency on housing needs of the population they serve. Poverty level, Very low income to Low income populations; Physically Disabled; Mentally Disabled; Homeless; Persons with AIDS.

3. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments:

No commitments have been made as of this filing.

D. Other Information Required by HUD

Attachments:

A. Supporting Documents Available for Review

B. Statement of Nondiscrimination and Privacy

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

List of Supporting Documents Available for Review		
X	public housing program	Resources
X	Public Housing Admissions and (Continued) Occupancy Policy (A&O), which includes the Tenant Selection and Assignment Plan [TSAP]	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public housing rent determination policies, including the methodology for setting public housing flat rents <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Schedule of flat rents offered at each public housing development <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies <input type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
X	Public housing grievance procedures <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
X	Section 8 informal review and hearing procedures <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
X	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant year	Annual Plan: Capital Needs
X	Most recent, approved 5 Year Action Plan for the Capital Fund/Comprehensive Grant Program, if not included as an attachment (provided at PHA option)	Annual Plan: Capital Needs
X	Policies governing any Section 8 Homeownership program <input type="checkbox"/> check here if included in the Section 8 Administrative Plan	Annual Plan: Homeownership
X	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
X	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports	Annual Plan: Community Service & Self-Sufficiency
X	The most recent fiscal year audit of the PHA conducted	Annual Plan: Annual

List of Supporting Documents Available for Review		
	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	Audit
X	Housing Needs expressed by eight Council Bluffs agencies who serve various very and low income populations— 8 documents	5 Year and Annual Plans

B. STATEMENT OF NONDISCRIMINATION AND PRIVACY

The Municipal Housing Agency of Council Bluffs, Iowa, (MHA) certifies that it will not discriminate because of race, color, gender, sexual preference, religion, age, disability, national origin or familial status in the leasing, rental, or other disposition of housing or related facilities(including property) included in any housing development(s) under its jurisdiction covered by a contract for annual contribution under the United States Housing Act of 1937, as amended, or in the use or occupancy thereof.

It is the policy of the PHA(Public Housing Agency) to fully comply with Title VI of the Civil rights Act of 1964, Title VIII and Section 3 of the Civil Rights Act of 1968, amended by the Community Development Act of 1974, Executive Order 11063, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and any other legislation protecting the rights of tenants, applicants, or staff which may subsequently be enacted(24 CFR 960.203).

The Housing Authority shall not automatically deny admission to any particular group or category of otherwise eligible families nor will any criteria be applied, or information be considered pertaining to attributes or behavior that may be imputed by some to be a particular group or category. All criteria

applied and information considered in administering this policy shall relate solely to the attributes and behavior of the individual members of the household.

It is also the policy of the PHA to guard the privacy of individuals in accordance with the Privacy Act of 1974, and insure the protection of individuals' records maintained by the PHA. Therefore, the Housing Authority shall not disclose any personal information(including, but not limited to information on any disability) contained in its records to any person or agency unless the individual about whom the information is requested gives written consent to such disclosure, or as required by law. This privacy policy in no way limits the PHA's ability to collect such information as it may need to determine eligibility, compute rent, or determine that applicant's suitability for tenancy.

The PHA is committed to identifying and eliminating situations which create barriers to equal housing for all. In accordance with Section 504, the PHA will make such procedural, administrative, locational, or physical changes as will reasonably accommodate persons with disability.