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

# PHA Plans

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

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

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

# PHA Plan
# Agency Identification

**PHA Name:** Chicago Housing Authority

**PHA Number:** IL002-001-99D

**PHA Fiscal Year Beginning:** 01/01/00

## Public Access to Information

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

☒ Main administrative office of the PHA
☐ PHA development management offices
☐ PHA local offices

## Display Locations For PHA Plans and Supporting Documents

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

☒ Main administrative office of the PHA
☒ PHA development management offices
☐ PHA local offices
☐ Main administrative office of the local government
☐ Main administrative office of the County government
☐ Main administrative office of the State government
☒ Public library
☒ PHA website
☒ Other (list below)
Central Advisory Council (CAC), 243 East 32nd Street, Chicago, IL 60616

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

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



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# 5-YEAR PLAN
# PHA FISCAL YEARS 2000 - 2004

[24 CFR Part 903.5]

## A. Mission

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

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

☒ The PHA's mission is:
The mission of the Chicago Housing Authority is to provide affordable housing opportunities in viable communities for lower-income households.

## B. Goals

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

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

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

☒ PHA Goal: Improve the quality of assisted housing
Objectives:
- ☐ Improve public housing management: (PHAS score)[1]

[1] Use modified performance measurements to capture true improvements as listed in the Plan for Transformation.



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

☒ PHA Goal: Increase assisted housing choices

Objectives:

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

1. See Human Capital Section in the Plan for Transformation.
2. Explore homeownership programs.

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

☒ PHA Goal: Provide an improved living environment

Objectives:

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

1. Create mechanisms to retain working families.
2. Obtain access into mixed-income developments.

**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:
- ☒ Connect residents to supportive services to improve assistance recipients' employability:
- ☒ Connect residents to supportive services to increase independence for the elderly or families with disabilities.
- ☐ Other: (list below)

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

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

See attached Plan for Transformation

**Other PHA Goals and Objectives: (list below)**

See attached Plan for Transformation



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# Annual PHA Plan
# PHA Fiscal Year 2000
[24 CFR Part 903.7]

## i. Annual Plan Type:

Select which type of Annual Plan the PHA will submit.

☒ **Standard Plan**

**Streamlined Plan:**

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

☐ **Troubled Agency Plan**

## ii. Executive Summary of the Annual PHA Plan

[24 CFR Part 903.7 9 (r)]

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

Refer to Plan for Transformation

## iii. Annual Plan Table of Contents

[24 CFR Part 903.7 9 (r)]

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

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## Attachments

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

Required Attachments:

☒ Admissions Policy for Deconcentration (See Admission & Occupancy Policy)
☒ FY 2000 Capital Fund Program Annual Statement
☒ Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)

Optional Attachments: See Plan for Transformation for checked boxes

☐ PHA Management Organizational Chart (See "other")
☒ FY 2000 Capital Fund Program 5 Year Action Plan
☐ Public Housing Drug Elimination Program (PHDEP) Plan
- ☒ Comments of Resident Advisory Board or Boards (must be attached if not included in PHA Plan text) **(**See Resident Comment Grids)**

☒ Other (List below, providing each attachment name)
- Financial Resources – Various Other Grant Programs
- Rent Structure – Calculating Rents (Public Housing)
- Civil Rights Safeguards in Tenant Selection and Assignment (Public Housing & Section 8)
- 202 Viability Test Summary
- Senior Designated Housing Plan
- HUD Office of the Inspector General CHA Audit Response
- Organizational Summary

## 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.



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| List of Supporting Documents Available for Review | | |
|---|---|---|
| **Applicable & On Display** | **Supporting Document** | **Applicable Plan Component** |
| MAP office<br>626 W. Jackson<br>6th Floor | PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations | 5 Year and Annual Plans |
| MAP office<br>626 W. Jackson<br>6th Floor | State/Local Government Certification of Consistency with the Consolidated Plan | 5 Year and Annual Plans |
| MAP office<br>626 W. Jackson<br>6th Floor | Fair Housing Documentation:<br>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 |
| MAP office<br>626 W. Jackson<br>6th Floor | 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:<br>Housing Needs |
| MAP office<br>626 W. Jackson<br>6th Floor | Most recent board-approved operating budget for the public housing program | Annual Plan:<br>Financial Resources; |
| MAP office<br>626 W. Jackson<br>6th Floor | 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 |
| MAP office<br>626 W. Jackson<br>6th Floor | Section 8 Administrative Plan | Annual Plan: Eligibility, Selection, and Admissions Policies |

| List of Supporting Documents Available for Review | | |
|---|---|---|
| **Applicable & On Display** | **Supporting Document** | **Applicable Plan Component** |
| MAP office<br>626 W. Jackson<br>6th Floor | Public Housing Deconcentration and Income Mixing Documentation:<br>1. PHA board certifications of compliance with deconcentration requirements (section 16(a) of the US Housing Act of 1937, as implemented in the 2/18/*99 Quality Housing and Work Responsibility Act Initial Guidance; Notice* and any further HUD guidance) and<br>2. Documentation of the required deconcentration and income mixing analysis | Annual Plan: Eligibility, Selection, and Admissions Policies |
| MAP office<br>626 W. Jackson<br>6th Floor | Public housing rent determination policies, including the methodology for setting public housing flat rents<br>☒ check here if included in the public housing<br>A & O Policy | Annual Plan: Rent Determination |
| MAP office<br>626 W. Jackson<br>6th Floor | Schedule of flat rents offered at each public housing development<br>☐ check here if included in the public housing<br>A & O Policy | Annual Plan: Rent Determination |
| MAP office<br>626 W. Jackson<br>6th Floor | Section 8 rent determination (payment standard) policies<br>☒ check here if included in Section 8 Administrative Plan | Annual Plan: Rent Determination |
| MAP office<br>626 W. Jackson<br>6th Floor | Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation) | Annual Plan: Operations and Maintenance |
| MAP office<br>626 W. Jackson<br>6th Floor | Public housing grievance procedures<br>☒ check here if included in the public housing<br>A & O Policy | Annual Plan: Grievance Procedures |
| MAP office<br>626 W. Jackson<br>6th Floor | Section 8 informal review and hearing procedures<br>☒ check here if included in Section 8 Administrative Plan | Annual Plan: Grievance Procedures |



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| List of Supporting Documents Available for Review | | |
|---|---|---|
| **Applicable & On Display** | **Supporting Document** | **Applicable Plan Component** |
| MAP office<br>626 W. Jackson<br>6th Floor | The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant year | Annual Plan: Capital Needs |
| N/A | Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant | Annual Plan: Capital Needs |
| MAP office<br>626 W. Jackson<br>6th Floor | 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 |
| Development Management<br>626 W. Jackson<br>8th Floor | Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans or any other approved proposal for development of public housing | Annual Plan: Capital Needs |
| Development Management<br>626 W. Jackson<br>8th Floor | Approved or submitted applications for demolition and/or disposition of public housing | Annual Plan: Demolition and Disposition |
| MAP office<br>626 W. Jackson<br>6th Floor | Approved or submitted applications for designation of public housing (Designated Housing Plans)<br>(Attached) | Annual Plan: Designation of Public Housing |
| MAP office<br>626 W. Jackson<br>6th Floor | Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act | Annual Plan: Conversion of Public Housing |
| MAP office<br>626 W. Jackson<br>6th Floor | Approved or submitted public housing homeownership programs/plans | Annual Plan: Homeownership |
| N/A | Policies governing any Section 8 Homeownership program<br><br>☐ check here if included in the Section 8 Administrative Plan | Annual Plan: Homeownership |
| Office of Programs<br>626 W. Jackson<br>7th Floor | Any cooperative agreement between the PHA and the TANF agency | Annual Plan: Community Service & Self-Sufficiency |

| List of Supporting Documents Available for Review | | |
|---|---|---|
| **Applicable & On Display** | **Supporting Document** | **Applicable Plan Component** |
| MAP office<br>626 W. Jackson<br>6th Floor | FSS Action Plan/s for public housing and/or Section 8 | Annual Plan: Community Service & Self-Sufficiency |
| MAP office<br>626 W. Jackson<br>6th Floor | Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports | Annual Plan: Community Service & Self-Sufficiency |
| MAP office<br>626 W. Jackson<br>6th Floor | The most recent Public Housing Drug Elimination Program (PHDEP) semi-annual performance report for any open grant and most recently submitted PHDEP application (PHDEP Plan) | Annual Plan: Safety and Crime Prevention |
| MAP office<br>626 W. Jackson<br>6th Floor | 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 |
| N/A | Troubled PHAs: MOA/Recovery Plan | Troubled PHAs |
| | Other supporting documents (optional)<br>(list individually; use as many lines as necessary) | (specify as needed) |

# 1. Statement of Housing Needs

[24 CFR Part 903.7 9 (a)]

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

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

**Housing Needs of Families in the Jurisdiction by Family Type**

| Family Type | Overall | Affordability | Supply | Quality | Accessibility | Size | Location |
|---|---|---|---|---|---|---|---|
| Income <= 30% of AMI | 140,685 | 5 | 5 | 4 | 5 | 5 | 4 |
| Income >30% but <=50% of AMI | 86,699 | 4 | 5 | 4 | 5 | 4 | 4 |
| Income >50% but <80% of AMI | 60,496 | 4 | 3 | 3 | 4 | 4 | 3 |
| Elderly | 72,076 | 3 | 3 | 3 | 4 | 2 | 2 |
| Families with Disabilities | 85,000 | 5 | 5 | 4 | 5 | 3 | 5 |
| Race/Ethnicity Blk | 73,943 | 5 | 5 | 4 | 3 | 4 | 4 |
| Race/Ethnicity Hisp | 27,181 | 5 | 4 | 4 | 3 | 5 | 4 |

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

☒ Consolidated Plan of the Jurisdiction/s
Indicate year: 2000

☒ U.S. Census data: the Comprehensive Housing Affordability Strategy ("CHAS") dataset

☐ American Housing Survey data
Indicate year:

☒ Other housing market study
Indicate year: 1999

☐ Other sources: (list and indicate year of information)

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



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

**Housing Needs of Families on the Waiting List**
**Public Housing**

Waiting list type: (select one)
- ☐ Section 8 tenant-based assistance
- ☒ Public Housing
- ☐ Combined Section 8 and Public Housing
- ☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional)

If used, identify which development/subjurisdiction:

| | # of families | % of total families | Annual Turnover |
|---|---|---|---|
| Waiting list total | 29,715 | | |
| Extremely low* income <=30% AMI | 28,366 | 95% | |
| Very low income* (>30% but <=50% AMI) | 1,137 | 4% | |
| Low income* (>50% but <80% AMI) | 212 | 1% | |
| Families with* children | 28,152 | 95% | |
| Elderly families | 2,224 | 7% | |
| Families with Disabilities | 5,489 | 18% | |
| Race/ethnicity Black | 19,230 | 65% | |
| Race/ethnicity White | 6,797 | 23% | |
| Race/ethnicity Ind/Alaskan | 22 | Less than 1% | |
| Race/ethnicity Asian | 474 | 2% | |
| | | | |
| Characteristics by Bedroom Size (Public Housing Only) | | | |



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| Housing Needs of Families on the Waiting List<br>Public Housing | | | |
|---|---|---|---|
| 0BR | 3 | Less than 1% | |
| 1BR | 8,705 | 29% | |
| 2 BR | 8,984 | 30% | |
| 3 BR | 8,015 | 27% | |
| 4 BR | 2,754 | 9% | |
| 5 BR | 382 | Less than 1% | |
| 5+ BR | 872 | 3% | |

*Public Housing Only

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

If yes:

How long has it been closed (# of months)?

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

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

**Housing Needs of Families on the Waiting List**
**Section 8**

Waiting list type: (select one)

☒ Section 8 tenant-based assistance

☐ Public Housing

☐ Combined Section 8 and Public Housing

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

If used, identify which development/subjurisdiction:

| | # of families | % of total families | Annual Turnover |
|---|---|---|---|
| Waiting list total | 29,687 | | |
| Extremely low income <=30% AMI | N/A* | | |



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| Housing Needs of Families on the Waiting List<br>Section 8 | | | |
|---|---|---|---|
| Very low income (>30% but <=50% AMI) | N/A* | | |
| Low income (>50% but <80% AMI) | N/A* | | |
| Families with children | N/A** | | |
| Elderly families | N/A** | | |
| Families with Disabilities | N/A** | | |
| Race/ethnicity White | N/A** | | |
| Race/ethnicity Black | N/A** | | |
| Race/ethnicity American Indian/Alaskan | N/A** | | |
| Race/ethnicity Asian/Pacific Island | N/A** | | |
| Race/ethnicity Hispanic | N/A** | | |
| Race/ethnicity No Answer | N/A** | | |
| | | | |
| Characteristics by Bedroom Size (Public Housing Only) | N/A* | | |
| 1BR | | | |
| 2 BR | | | |
| 3 BR | | | |
| 4 BR | | | |
| 5 BR | | | |
| 5+ BR | | | |



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| Housing Needs of Families on the Waiting List<br>Section 8 |
| --- |
| Is the waiting list closed (select one)? ☐ No ☒ Yes<br>If yes:<br>How long has it been closed (# of months)? 29<br>Does the PHA expect to reopen the list in the PHA Plan year? ☒ No ☐ Yes<br>Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☒ Yes Special admissions will be permitted, such as 200 vouchers reserved for persons with disabilities, even if the list is closed. This will be done pursuant to the Designated Housing Plan. |

*The Section 8 waiting list is comprised of applicants selected by lottery from June 30 through July 14, 1997 to be placed on a waiting list of 35,000. At that time, lottery entries required only name, address, gender of head of household, race, ethnic origin, and source of number of disabled household members, if any. Once the waiting list applicant becomes eligible for a certificate, the Section 8 program assesses the applicant's income for subsidy determination and bedroom size requirement. Therefore, income data at the time of application is not relevant until the applicant is called for an assessment.
**The most recent data source of this information is from the application process conducted in 1997.

## C. Strategy for Addressing Needs

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

### (1) Strategies

**Need: Shortage of affordable housing for all eligible populations**

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

Select all that apply

- ☒ Employ effective maintenance and management policies to minimize the number of public housing units off-line
- ☒ Reduce turnover time for vacated public housing units
- ☒ Reduce time to renovate public housing units
- ☒ Seek replacement of public housing units lost to the inventory through mixed finance development



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

See Plan for Transformation

**Strategy 2: Increase the number of affordable housing units by:**
Select all that apply

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

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

**Strategy 1: Target available assistance to families at or below 30 % of AMI**
Select all that apply

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

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

**Strategy 1: Target available assistance to families at or below 50% of AMI**
Select all that apply



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

1. Income Disregard

**Need: Specific Family Types: The Elderly**

**Strategy 1: Target available assistance to the elderly:**
Select all that apply

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

**Need: Specific Family Types: Families with Disabilities**

**Strategy 1: Target available assistance to Families with Disabilities:**
Select all that apply

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

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

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

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

**Strategy 2: Conduct activities to affirmatively further fair housing**
Select all that apply



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

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

**(2) Reasons for Selecting Strategies**

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

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

## 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)** | | |
| a) Public Housing Operating Fund | 240,991,636 | |
| b) Public Housing Capital Fund | 146,240,733 | |
| c) HOPE VI Revitalization | 35,000,000[2] | |
| d) HOPE VI Demolition | 0 | |
| e) Annual Contributions for Section 8 Tenant-Based Assistance | 208,794,989 | |
| f) Public Housing Drug Elimination Program (including any Technical Assistance funds) | 8,261,440 | |
| g) Resident Opportunity and Self-Sufficiency Grants | 0 | |
| h) Community Development Block Grant | 0 | |
| i) HOME | | |
| Other Federal Grants (list below) | 8,860,381 | |
| | | |
| **2. Prior Year Federal Grants (unobligated funds only) (list below) See attached** | | |
| PHDEP | 2,231,572 | |
| | | |
| | | |
| **3. Public Housing Dwelling Rental Income** | | |
| | | |
| | | |
| **4. Other income** (list below) | | |

[2] Estimated amount CHA will apply for during FY 2000.



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| Financial Resources: Planned Sources and Uses | | |
|---|---|---|
| **Sources*** | **Planned $** | **Planned Uses** |
| | | |
| | | |
| **5. Non-federal sources** (list below) | | |
| **City/State** | 6,653,546 | |
| | | |
| | | |
| **Total resources** | 622,034,297 | |
| | | |
| | | |

* See Attachment (Various Other Grant Programs)



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## 3. PHA Policies Governing Eligibility, Selection, and Admissions

[24 CFR Part 903.7 9 (c)]

### A. Public Housing

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

**(1) Eligibility**

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

☐ When families are within a certain number of being offered a unit: (state number)
☐ When families are within a certain time of being offered a unit: (state time)
☒ Other: (describe)

At the time of the interview.

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

☒ Criminal or Drug-related activity
☒ Rental history - Landlord verification
☒ Housekeeping
☒ Other (describe)

Credit Check

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 Cook County enforcement agencies for screening purposes?

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

**(2)Waiting List Organization**

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

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

The Gautreaux Court Order imposes a Tenant Selection and Assignment Plan for family properties.

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

☐ PHA main administrative office
☒ PHA development site management office (Site Based)
☒ Other (list below)

Occupancy Department
Latino Site Office

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

1. How many site-based waiting lists will the PHA operate in the coming year?
58 Seniors/17 Family

2. ☒ Yes ☐ No: Are any or all of the PHA's site-based waiting lists new for the upcoming year (that is, they are not part of a previously-HUD-approved site based waiting list plan)?
If yes, how many lists? 17 Family

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

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

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

Occupancy Department

**(3) Assignment**

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

☒ One - If an applicant rejects a unit without good cause for site-based waiting list.
☐ Two
☐ Three or More

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



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

A. Current system:

(1) Family Gautreaux – General Wait List

Once an offer of housing is made to the applicant and the applicant declines the offer of housing, the applicant is removed from the general wait list to a sub-wait list. There is no limit on the number of refusals that can be made by the applicant. The applicant will keep his place on the sub-wait list. The applicant may also transfer between sub-wait lists.

(2) Scattered Sites Gautreaux

50% of offers are made to applicants from community area by lottery.
25% of offers are made to existing residents who request a transfer.
25% of applicants from CHA's wait lists are offered units.

(3) Senior Site-Based Wait List

Applicants are allowed to choose up to three (3) sites of their choice. Once an offer of housing is made from any of the chosen wait lists, if an applicant refuses, their name is placed on the bottom of all three (3) wait lists.

B. Proposed system:

Site-based waiting list for all properties, scattered sites to retain Gautreaux percentages.

**(4) Admissions Preferences**

a. Income targeting:

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

b. Transfer policies:

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

☒ Emergencies
☒ Overhoused
☒ Underhoused
☒ Medical justification
☒ Administrative reasons determined by the PHA (e.g., to permit modernization work)

☐ Resident choice: (state circumstances below)
☒ Other: (list below)

Gautreaux

c. Preferences

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

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

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

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

- Local Preferences

a) Single applicants who are elderly, near elderly, disabled or displaced and will continue to limit single person families to zero (0) or one (1) bedroom units only.

b) Current residents and applicants who require accessible units.

c) Right of lease-compliant residents displaced as a result of redevelopment to return to available public housing unit.

d) Families with income between 0% and 30% of Area Median Income AND families with income between 30% and 80% of Area Median Income.

NOTE: The CHA will conduct an annual review of income in each development to ensure the ratio of fifty (50) percent 0-30 % of Area Median Income and fifty (50) % percent 30-80 % of Area Median Income.

- Ranking Preferences

Among local preferences applicants described above, ranking preferences will be granted in the following order:

a) Documented victims of domestic violence and

b) Upward Mobility Families – adult member who is either verified to be working at least 20 hours per week, attending an educational institution on a full-time basis, or participating in an approved job training program
Applicants who children are verified to be at risk of placement because of inadequate food, clothing, shelter or environmental neglect or whose children cannot be returned home because the family cannot provide for the children's subsistence needs.

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) Local Preferences

a) Single applicants who are elderly, near elderly, disabled or displaced and will continue to limit single person families to zero (0) or one (1) bedroom units only.

b) Current residents and applicants who require accessible units.

c) Right of lease-compliant residents displaced as a result of redevelopment to return to available public housing unit.

d) Families with income between 0% and 30% of area Median Income AND families with income between 30% and 80% of Area Median Income.

(2) Ranking Preferences

Among local preferences applicants described above, ranking preferences will be granted in the following order:

a) Documented victims of domestic violence;



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b) Upward Mobility Families – adult member who is either verified to be working at least 20 hours per week, attending an educational institution on a full-time basis, or participating in an approved job training program; and

c) Applicants whose children are verified to be at risk of placement outside the home because of inadequate food, clothing, shelter or environmental neglect or whose children cannot be returned home because the family cannot provide for the children's subsistence needs.

(3) Date and Time of Application

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 the jurisdiction
☐ Those enrolled currently in educational, training, or upward mobility programs
☐ Households that contribute to meeting income goals (broad range of incomes)
☐ Households that contribute to meeting income requirements (targeting)
☐ Those previously enrolled in educational, training, or upward mobility programs
☐ Victims of reprisals or hate crimes
☐ Other preference(s) (list below)

4. Relationship of preferences to income targeting requirements:

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

**(5) Occupancy**

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

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

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

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



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**(6) Deconcentration and Income Mixing**

a. ☒ Yes ☐ No: Did the PHA's analysis of its family (general occupancy) developments to determine concentrations of poverty indicate the need for measures to promote deconcentration of poverty or income mixing?

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

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

☒ Adoption of site-based waiting lists
If selected, list targeted developments below:

All viable developments.

☒ Employing waiting list "skipping" to achieve deconcentration of poverty or income mixing goals at targeted developments
If selected, list targeted developments below:

All viable developments.

☐ Employing new admission preferences at targeted developments
If selected, list targeted developments below:

☐ Other (list policies and developments targeted below)

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

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

☐ Additional affirmative marketing
☒ Actions to improve the marketability of certain developments
☒ Adoption or adjustment of ceiling rents for certain developments
☒ Adoption of rent incentives to encourage deconcentration of poverty and income-mixing
☐ Other (list below)

f. Based on the results of the required analysis, in which developments will the PHA make special efforts to attract or retain higher-income families? (select all that apply)

☐ Not applicable: results of analysis did not indicate a need for such efforts

☒ List (any applicable) developments below:

All viable developments.

g. Based on the results of the required analysis, in which developments will the PHA make special efforts to assure access for lower-income families? (select all that apply)

☐ Not applicable: results of analysis did not indicate a need for such efforts

☒ List (any applicable) developments below:

All viable developments.

## B. Section 8

Exemptions: PHAs that do not administer section 8 are not required to complete sub-component 3B.
**Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

### (1) Eligibility

a. What is the extent of screening conducted by the PHA? (select all that apply)

☒ Criminal or drug-related activity only to the extent required by law or regulation

☐ Criminal and drug-related activity, more extensively than required by law or regulation

☒ More general screening than criminal and drug-related activity (list factors below)

Currently the extent of CHA's screening consists of criminal or drug-related activity. However, the CHA proposes to include the following to screen applicants:

1. Credit check;
2. Housekeeping; and
3. Rental history.

☐ Other (list below)

b. ☒ Yes ☐ No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?

c. ☒ Yes ☐ No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?

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

e. Indicate what kinds of information you share with prospective landlords? (select all that apply)

☐ Criminal or drug-related activity
☒ Other (describe below)

Name, address, and phone of previous landlord, if known.

**(2) Waiting List Organization**

a. With which of the following program waiting lists is the Section 8 tenant-based assistance waiting list merged? (select all that apply)

☐ None
☐ Federal public housing
☒ Federal moderate rehabilitation
☒ Federal project-based certificate program
☐ Other federal or local program (list below)

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

☐ PHA main administrative office
☒ Other (list below)
Application process is closed until current wait list is exhausted.

**(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:

Due to the tight housing market, all searchers get 120 days to use vouchers, with merger regulations, families may get more time.

**(4) Admissions Preferences**

a. Income targeting

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

b. Preferences

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

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

Former Federal preferences

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

Other preferences (select all that apply)

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

Current:

- Residents of CHA senior designated complexes who are Non-Elderly, Disabled (capped at 50 per year).
- Residents with Elevated Blood Levels (EBL) children or in hazardous housing situations.
- Resident families (or single residents) of CHA who are currently residing in public housing units and who will be displaced by demolition, disposition, rehabilitation, or vacancy consolidation.
- Applicants covered under the Latino Consent Decree.

Proposed:

- Resident families (or single residents) of CHA who are currently residing in public housing units and who will be displaced by demolition, disposition, rehabilitation, or vacancy consolidation.

- Residents of Elderly CHA senior designated complexes who are Non-Elderly, Disabled (capped at 100 per year).

- Residents with Elevated Blood Levels (EBL) children or in hazardous housing situations.

- Applicants covered under the Latino Consent Decree.

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.

Former Federal preferences

1) Victims of Domestic Violence

2) Date and Time of Application

Other preferences (select all that apply)

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

Current:

1) Residents of CHA senior designated complexes who are Non-Elderly, Disabled (capped at 50 per year).

2) Residents with Elevated Blood Levels (EBL) children or in hazardous housing situations.

3) Resident families (or single residents) of CHA who are currently residing in public housing units and who will be displaced by demolition, disposition, rehabilitation, or vacancy consolidation.

4) Applicants covered under the Latino Consent Decree.

Proposed:

1) Resident families (or single residents) of CHA who are currently residing in public housing units and who will be displaced by demolition, disposition, rehabilitation, or vacancy consolidation.

2) Residents with Elevated Blood Levels (EBL) children or in hazardous housing situations.

3) Residents of Elderly CHA complexes who are Non-Elderly, Disabled (capped at 100 per year).

4) Applicants covered under the Latino Consent Decree.

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) - N/A

☐ 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



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

**(5) Special Purpose Section 8 Assistance Programs**

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

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

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

☐ Through published notices
☒ Other (list below)

As required by the response in each NOFA, the CHA announces the availability of special-purpose Section 8 programs by the following methods:

1. Family Unification Program announces upon receipt of Department of Family Services determinations that individuals are deemed ready to have their children returned to the household;
2. Preservation/Opt Out announces to the residents of the specific site via written notice; and
3. Veteran's Affairs Supportive Housing (VASH) vouchers are allocated to Hines Veteran's Hospital and made known to veterans through the administration.
4. Vouchers for non-elderly persons with disabilities by written notice (per Designated Housing Plan).

# 4. Rent Determination Policies

[24 CFR Part 903.7 9 (d)]

## A. Public Housing

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

### (1) Income Based Rent Policies

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

a. Use of discretionary policies: (select one)

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

---or---

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

b. Minimum Rent

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

☒ $0
☐ $1-$25
☐ $26-$50

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

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

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?
**(See e. Ceiling Rents)**



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2. If yes to above, list the amounts or percentages charged and the circumstances under which these will be used below: **(See e. Ceiling Rents)**

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

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

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

☐ For household heads
☐ For other family members
☐ For transportation expenses
☐ For the non-reimbursed medical expenses of non-disabled or non-elderly families
☐ Other (describe below)

e. Ceiling rents

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

☒ Yes for all developments
☐ Yes but only for some developments
☐ No

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

☒ For all developments
☐ For all general occupancy developments (not elderly or disabled or elderly only)
☐ For specified general occupancy developments
☐ For certain parts of developments; e.g., the high-rise portion
☐ For certain size units; e.g., larger bedroom sizes
☐ Other (list below)

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

☐ Market comparability study
☒ Fair market rents (FMR)
☐ 95th percentile rents
☐ 75 percent of operating costs
☐ 100 percent of operating costs for general occupancy (family) developments
☒ Operating costs plus debt service
☐ The "rental value" of the unit
☒ Other (list below)

1. Schedule I (Existing stock) Total Average Monthly Amounts (TAMA)-based
2. Schedule II (New, replacement, or rehabbed units) 80% of FMR

Note: A Schedule of Ceiling Rents can be found as an attachment to the Admissions and Occupancy Policy.

f. Rent re-determinations:

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

☐ Never
☐ At family option
☐ Any time the family experiences an income increase
☒ Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold) 10%
☒ Other (list below)

1. A family member 18 years or older is added to the lease
2. If a resident's Total Tenant Payment (TTP) is 0 and his circumstances change (receives an increase in income.)

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

**(2) Flat Rents**

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

☒ The Section 8 rent reasonableness study of comparable housing (To be established by June 2000)
☐ Survey of rents listed in local newspaper



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☐ Survey of similar unassisted units in the neighborhood
☐ Other (list/describe below)

## B. Section 8 Tenant-Based Assistance

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

### (1) Payment Standards

Describe the voucher payment standards and policies.

a. What is the PHA's payment standard? (select the category that best describes your standard)
☐ At or above 90% but below100% of FMR
☒ 100% of FMR
☐ Above 100% but at or below 110% of FMR
☒ Above 110% of FMR (if HUD approved; describe circumstances below)
- For 15 Neighborhoods in the city.

b. If the payment standard is lower than FMR, why has the PHA selected this standard? (select all that apply) - N/A
☐ FMRs are adequate to ensure success among assisted families in the PHA's segment of the FMR area
☐ The PHA has chosen to serve additional families by lowering the payment standard
☐ Reflects market or submarket
☐ Other (list below)

c. If the payment standard is higher than FMR, why has the PHA chosen this level? (select all that apply)
☒ FMRs are not adequate to ensure success among assisted families in the PHA's segment of the FMR area
☒ Reflects market or submarket
☒ To increase housing options for families
☐ Other (list below)

d. How often are payment standards reevaluated for adequacy? (select one)
☒ Annually
☐ Other (list below)

e. What factors will the PHA consider in its assessment of the adequacy of its payment standard? (select all that apply)
☒ Success rates of assisted families
☒ Rent burdens of assisted families



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☐ Other (list below)

**(2) Minimum Rent**

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

☒ $0

☐ $1-$25

☐ $26-$50

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

## 5. Operations and Management

[24 CFR Part 903.7 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. (See attached Plan for Transformation)

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

See Attachment (Organizational Description)

### 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 | 24,947 | | 2,141 |
| Section 8 Vouchers | 20,473 | | 1,920 |
| Section 8 Certificates | 0 | | 0 |
| Section 8 Mod Rehab | 1,957 | | 180 |
| Special Purpose Section 8 Certificates/Vouchers (list individually) | FUP | 100 | 12 |
| | MTO | 240 | 24 |
| | PBC | 470 | 48 |
| | VASH | 45 | 0 |
| | Relocation, Inc. | 1,780 | 168 |
| | Preservation/ Opt Out | 606 | 60 |
| Public Housing Drug Elimination Program (PHDEP) | 1,000 | | 62% |
| **Other Federal Programs(list individually)** | | | |



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| | | |
|---|---|---|
| City/State | 1,120 | 102 |
| Project-Based | 2,462 | 186 |

## 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)

a. Operations Maintenance Manual
b. Current Private Management Contract

(2) Section 8 Management: (list below)

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

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

If yes, list additions to federal requirements below:

Recommendations from the Resident Advisory Board to adapt the current grievance procedures to accommodate the asset management approach.

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

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

### B. Section 8 Tenant-Based Assistance

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

If yes, list additions to federal requirements below:

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

☐ PHA main administrative office
☒ Other (list below)

Section 8 – CHAC, 1000 South Wabash, Chicago, Illinois 60605



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## 7. Capital Improvement Needs

[24 CFR Part 903.7 9 (g)]

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

### A. Capital Fund Activities

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

#### (1) Capital Fund Program Annual Statement

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

Select one:

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

-or-

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

#### (2) Optional 5-Year Action Plan

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

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

b. If yes to question a, select one:

☒ The Capital Fund Program 5-Year Action Plan is provided as an attachment to the PHA Plan at Attachment
(See Plan for Transformation)

-or-

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

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

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

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

b) Status of HOPE VI revitalization grant (complete one set of questions for each grant)

1. Development name:
Frances Cabrini/Green ("Cabrini-Green Homes")
Robert Taylor Homes ("Taylor Homes")
Henry Horner Homes ("Horner Homes")
Robert Brooks Homes Extension ("Brooks Extension")
Jane Addams Homes/Robert H. Brooks Homes Extension/Loomis Courts/ Grace Abbot Homes ("ABLA Homes").

2. Development (project) number:
IL06URD002I194 (Cabrini-Green), IL06URD002I196 (Taylor Homes), IL06URD002I396 (Horner Homes), IL06URD002I296 (Brooks Extension), and IL06URD002I198 (ABLA Homes).

3. Status of grant: (select the statement that best describes the current status)
1 Revitalization Plan under development **(ABLA Homes)**
2 Revitalization Plan submitted, pending approval **(Horner Homes and Brooks Extension)**
3 Revitalization Plan approved **(Taylor Homes - Conditional)**
4 Activities pursuant to an approved Revitalization Plan underway **(Cabrini-Green)**

☒ 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:
- Madden Park Homes
- Ida B. Wells Homes

☒ Yes ☐ No: d) Will the PHA be engaging in any mixed-finance development activities for public housing in the Plan year?



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If yes, list developments or activities below:

- North Town Village, 535 West North Avenue
- Raymond M. Hilliard Center
- St. Edmunds Meadows (Washington Park Scattered Sites)

☒ 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:

- See Plan for Transformation

## 8. Demolition and Disposition

[24 CFR Part 903.7 9 (h)]

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

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

2. Activity Description

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

| **Demolition/Disposition Activity Description** |
|---|
| 1a. Development name:<br>1b. Development (project) number: |
| 2. Activity type: Demolition ☐<br>Disposition ☐ |
| 3. Application status (select one)<br>Approved ☐<br>Submitted, pending approval ☐<br>Planned application ☐ |
| 4. Date application approved, submitted, or planned for submission: (DD/MM/YY) |
| 5. Number of units affected:<br>6. Coverage of action (select one)<br>☐ Part of the development<br>☐ Total development |
| 7. Timeline for activity:<br>a. Actual or projected start date of activity:<br>b. Projected end date of activity: |



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

[24 CFR Part 903.7 9 (i)]

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

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

**See attached grid of designation of public housing activity and designated housing plan**

2. Activity Description

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

| **Designation of Public Housing Activity Description** |
|---|
| 1a. Development name:<br>1b. Development (project) number: |
| 2. Designation type:<br>Occupancy by only the elderly ☐<br>Occupancy by families with disabilities ☐<br>Occupancy by only elderly families and families with disabilities ☐ |
| 3. Application status (select one)<br>Approved; included in the PHA's Designation Plan ☐<br>Submitted, pending approval ☐<br>Planned application ☐ |
| 4. Date this designation approved, submitted, or planned for submission: (DD/MM/YY) |



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| |
|---|
| 5. If approved, will this designation constitute a (select one)<br>☐ New Designation Plan<br>☐ Revision of a previously-approved Designation Plan? |
| 6. Number of units affected:<br>7. Coverage of action (select one)<br>☐ Part of the development<br>☐ Total development |



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## 10. Conversion of Public Housing to Tenant-Based Assistance

[24 CFR Part 903.7 9 (j)]

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

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

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

**See attached grid of conversion of public housing activity.**

2. Activity Description

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

| **Conversion of Public Housing Activity Description** |
|---|
| 1a. Development name:<br>1b. Development (project) number: |
| 2. What is the status of the required assessment?<br>☐ Assessment underway<br>☐ Assessment results submitted to HUD<br>☐ Assessment results approved by HUD (if marked, proceed to next question)<br>☒ Other (explain below) See Capital Alternative Viability Test in Plan for Transformation |
| 3. ☐ Yes ☐ No: Is a Conversion Plan required? (If yes, go to block 4; if no, go to block 5.) |
| 4. Status of Conversion Plan (select the statement that best describes the current status)<br>☐ Conversion Plan in development<br>☐ Conversion Plan submitted to HUD on: (DD/MM/YYYY)<br>☐ Conversion Plan approved by HUD on: (DD/MM/YYYY)<br>☐ Activities pursuant to HUD-approved Conversion Plan underway |



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5. Description of how requirements of Section 202 are being satisfied by means other than conversion (select one)

- ☐ Units addressed in a pending or approved demolition application (date submitted or approved:
- ☐ Units addressed in a pending or approved HOPE VI demolition application (date submitted or approved: )
- ☐ Units addressed in a pending or approved HOPE VI Revitalization Plan (date submitted or approved: )
- ☐ Requirements no longer applicable: vacancy rates are less than 10 percent
- ☐ Requirements no longer applicable: site now has less than 300 units
- ☐ Other: (describe below)

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

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

## 11. Homeownership Programs Administered by the PHA

[24 CFR Part 903.7 9 (k)]

### A. Public Housing

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

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

2. Activity Description

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

| **Public Housing Homeownership Activity Description (Complete one for each development affected)** |
|---|
| 1a. Development name: Wentworth Gardens Annex<br>1b. Development (project) number: IL 002-008 |
| 2. Federal Program authority:<br>☐ HOPE I<br>☒ 5(h)<br>☐ Turnkey III<br>☐ Section 32 of the USHA of 1937 (effective 10/1/99) |
| 3. Application status: (select one)<br>☒ Approved; included in the PHA's Homeownership Plan/Program<br>☐ Submitted, pending approval<br>☐ Planned application |
| 4. Date Homeownership Plan/Program approved, submitted, or planned for submission: (06/27/96) |



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5. Number of units affected: 98

6. Coverage of action: (select one)
☐ Part of the development
☒ Total development

**B. Section 8 Tenant Based Assistance**

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

*The CHA's decision to administer a homeownership program would depend on an evaluation conducted during the plan year.

2. Program Description:

a. Size of Program
☐ Yes ☐ No: Will the PHA limit the number of families participating in the section 8 homeownership option? N/A

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: N/A



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

If yes, what was the date that agreement was signed? 05/15/93

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

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

### B. Services and programs offered to residents and participants

#### (1) General

a. Self-Sufficiency Strategies

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

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



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☐ 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) |
| Employment Initiatives | Placement-900, Recruit-3000 | First Come, First Serve | All Developments | Both |
| Child Care | | | | |
| Family Services<br>Dare Plus<br>Employability Plus | <br>33<br>45 | <br>33<br>45 | <br>Recruitment<br>" | <br>Public Housing<br>" |
| Mama Said | Recruited 200<br><br>Placement<br>125 | Recruitment/ Referral | Five – Wells, Ickes, Rockwell, Stateway and Altgeld (Development Office) | Both |
| Teen Parent Services | Referral – 29 | Referral through DHS | Rockwell Gardens * Henry Horner | Both |
| Child Health Intervention Programs | Recruited 88 | Recruitment | Rockwell Gardens | Public Housing |
| GED and Education<br>• Columbia College High School Summer Institute<br>• College Bound<br>• Pathways to Success College Fair<br>• Presidential Classroom Scholars | <br>11<br><br>37<br>300<br><br>4 | <br>19<br><br>60<br><br><br>30 | <br>All Developments<br><br>"<br>"<br><br>" | <br>Public Housing for all. |



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| | | | | |
|---|---|---|---|---|
| Teen and Young Adult<br>• Little Kick Soccer<br>• Chase Cup (Soccer Program)<br>• MBL Program<br><br><br><br><br>• Biddy Basketball Program | <br>268<br>360<br>320<br><br><br><br><br>320 | <br>Recruitment<br>"<br>"<br><br><br><br><br>" | <br>All Developments<br>"<br>Rockwell, Stateway, Taylor A & B, Ickes, Lathrop, ABLA, Horner & Altgeld<br><br>Rockwell, Stateway, Taylor A & B, Ickes, Lathrop, ABLA, Horner & Altgeld | <br>Both<br>Both<br>Both<br><br><br><br><br>Both |
| Children & Youth<br>• Scout Programs<br><br><br><br>• Biddy Cheerleaders<br><br>• Ambassador Choir | <br>537 registered boy, girl and Explorers ages 5-20<br><br>31<br><br>63 | <br>Recruitment<br><br><br>Recruitment<br><br>Recruitment | <br>All family housing developments<br><br><br>Robert Taylor<br><br>Wells, Madden Park, Hilliard, Ickes, Dearborn | <br>Both<br><br><br>Public Housing<br><br>Both |
| Section 8 and Relocation | 1500 | Referral for Vacancy Consolidation Plan | All CHA Developments | Both |
| Summer Food Service Program | 1,450,109 meals served | 18 & under | All developments & scattered sites | Both |
| MOWD | 652 | First come, first served | All developments & scattered sites (work sites) | Both |
| Lock-In | 670 | Random selection | All developments & scattered sites | Public Housing |
| Mock Trial | 400 | Random selection | All developments & scattered sites | Public Housing |
| Youth Councils | 14 | 18 & under | All developments & scattered sites | Public Housing |
| Recognition Ceremony | 70 | Specific criteria | Regions I & II | Public Housing |
| Youth Can Cook | 71 | Specific criteria | All developments & scattered sites | Public Housing |
| Jump Rope | 200 | Specific criteria | All developments & scattered sites | Public Housing |
| Landscaping/Beautification | 403 | First come, first served | All developments & scattered sites | Public Housing |
| Take Our Daughters to Work | 48 | Recruitment | | |
| Science Fair | 75 | Specific criteria | All developments & scattered sites | Public Housing |

| | | | | |
|---|---|---|---|---|
| Black History | 245 | First come, first served | All developments & scattered sites | Public Housing |
| Altgeld Gardens Youth Program | 56 | Special criteria | Altgeld Gardens only | Public Housing |
| Project Peace | 24 per session | Special criteria | Washington Park & scattered sites | Public Housing |
| Div. of Resident Development | Potentially impacts all CHA | Via Program Participation or Special Request | Division of Resident Dev't central office | Both |
| Small Business Development | Potentially impacts all CHA | Via Targeted Recruitment | Division of Resident Dev't central office | Both |
| Tenant Patrol | Potentially impacts all CHA | Via Targeted Recruitment | Development and field offices | Public Housing |
| Victim Assistance | Potentially impacts all CHA | In Response to a Crisis | Development and field offices | Public Housing |
| C.H.A.N.G.E Centers | Recruit-3000<br>Place-9000 | Random Selection | All Departments | Both |
| Quantum | 80 | Waiting List | Grand Blvd. Area | Low Income, High School |
| Youth Power | Abla-11<br>Altgeld 10<br>Ickes-33<br>Leclaire-20<br>Taylor A-15<br>Rockwell-27<br>Stateway-12<br>Wells-11 | Available to all that are interested | All in the specific Development | Public Housing |
| CHARIOT | 900 Residents | Waiting List | | |
| Just Say Know Clubs | Abla-32<br>Altgeld-14<br>Cabrini A-40<br>Cabrini B-46<br>Deerborn-50<br>Ickes-42<br>Latrhop 31<br>Leclaire-45<br>Taylor A-33<br>Rockwell-11<br>Stateway-40<br>Wells-11 | | | |
| Life Educational Center (Mobile Unit) | All CHA Developments and adjacent Public Schools, and Delegate Agencies | This mobile unit is called upon request | All CHA Developments and adjacent Public Schools, and Delegate Agencies | All CHA Residents |



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| | | | | |
|---|---|---|---|---|
| Substance Abuse Treatment | All CHA Residents (300) | Substance Abuse Problem | Come to the B.H.S. Office for an assessment and referral | CHA Resident |
| Community Workshops | All of CHA | Residents Choose to come | Come if you are a CHA resident | |
| Student Assistance Program JF | All of CHA | In the schools adjacent to the Development | Enrolled in school | CHA Resident |
| Property Management Training and Continuing Education | Potentially impacts all CHA | Via Targeted Recruitment | Development offices, RMC offices, Division of Resident Dev't central office | Both |

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:

**3. Welfare Benefit Reductions**

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

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

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

## 13. PHA Safety and Crime Prevention Measures

[24 CFR Part 903.7 9 (m)]

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

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

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

- ☒ High incidence of violent and/or drug-related crime in some or all of the PHA's developments
- ☒ High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to the PHA's developments
- ☒ Residents fearful for their safety and/or the safety of their children
- ☒ Observed lower-level crime, vandalism and/or graffiti
- ☒ People on waiting list unwilling to move into one or more developments due to perceived and/or actual levels of violent and/or drug-related crime
- ☐ Other (describe below)

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

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

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

All CHA Developments

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



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

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

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

**C. Coordination between PHA and the police**

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

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

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

**D. Additional information as required by PHDEP/PHDEP Plan**

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

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



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## 14. RESERVED FOR PET POLICY

[24 CFR Part 903.7 9 (n)]

## 15. Civil Rights Certifications

[24 CFR Part 903.7 9 (o)]

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

See Attached

Also included are the Civil Rights Safeguards in Tenant Selection and Assignment/Other Fair Housing Concerns.

See Attached

## 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?—N/A If not, when are they due (state below)?

## 17. PHA Asset Management

[24 CFR Part 903.7 9 (q)]

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

1. ☒ Yes ☐ No: Is the PHA engaging in any activities that will contribute to the long-term asset management of its public housing stock , including how the Agency will plan for long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs that have **not** been addressed elsewhere in this PHA Plan?

   See Plan for Transformation

2. What types of asset management activities will the PHA undertake? (select all that apply)

☐ Not applicable
☒ Private management
☒ Development-based accounting
☒ Comprehensive stock assessment
☐ Other: (list below)

3. ☐ Yes ☒ No: Has the PHA included descriptions of asset management activities in the **optional** Public Housing Asset Management Table?
   (See Plan for Transformation)



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

## 18. Other Information

[24 CFR Part 903.7 9 (r)]

### A. Resident Advisory Board Recommendations

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

2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)

☐ Attached at Attachment (File name)

☒ Provided below:
See attached grid

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:
(See grid for comment by comment.)

☐ 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)

**Residents**: The Central Advisory Council (CAC), which is the ruling body of the Local Advisory Council (LAC) made up of at least one representative from each development, conducted legal technical assistance training for all LAC members. At the end of the first training session, which served as an introduction to each subject area (seven total) of the Quality Housing and Work Responsibility Act, four LAC members from each subject area were nominated to serve on the Resident Advisory Board (RAB).

**Section 8**: A mass mailing was conducted to all Section 8 participants that were former residents and non-residents. Of those that responded, an invitation was extended to the legal assistance training session including the first where RAB members were nominated.

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)

Any CAC, LAC and Section 8 recipient.

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)

Illinois Law on subject

## C. Statement of Consistency with the Consolidated Plan

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

1. Consolidated Plan jurisdiction: City of Chicago

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)
(See attached City of Chicago Department of Housing Preliminary Consolidated Plan for 2000)

## D. Other Information Required by HUD

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

# Attachments

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



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

# PHA Plan
# Table Library

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

****(CAPITAL FUND ANNUAL STATEMENT IS ATTACHED)**

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

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

☐ Original Annual Statement

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

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

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

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

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

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

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

| Optional 5-Year Action Plan Tables | | | |
|---|---|---|---|
| **Development Number** | **Development Name (or indicate PHA wide)** | **Number Vacant Units** | **% Vacancies in Development** |
| | | | |

| **Description of Needed Physical Improvements or Management Improvements** | **Estimated Cost** | **Planned Start Date (HA Fiscal Year)** |
|---|---|---|
| | | |
| **Total estimated cost over next 5 years** | | |

**Table Library**

## Optional Public Housing Asset Management Table

See Technical Guidance for instructions on the use of this table, including information to be provided.

| Public Housing Asset Management | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| **Development Identification** | | **Activity Description** | | | | | | |
| Name, Number, and Location | Number and Type of units | Capital Fund Program Parts II and III *Component 7a* | Development Activities *Component 7b* | Demolition / disposition *Component 8* | Designated housing *Component 9* | Conversion *Component 10* | Home-ownership *Component 11a* | Other (describe) *Component 17* |
| | | | | | | | | |
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## Viability and Conversion to Vouchers — Section 202 of the Omnibus Consolidation Rescissions and Appropriations Act of 1996

Section 202 of the Omnibus Consolidation Rescissions and Appropriations Act of 1996 mandated a viability (or conversion to vouchers) test for certain public housing properties. HUD regulations require that public housing authorities determine the feasibility of keeping certain distressed public housing properties by comparing the cost to fix and maintain the property over twenty years to the cost of providing a voucher for all families in occupancy.

If it is determined that the cost of fixing and maintaining the property is greater than the cost of awarding Section 8 assistance, a conversion plan must be prepared and submitted to HUD. The conversion plan describes how families in occupancy will be relocated and includes provisions for resident and local comment and a schedule for demolition of the buildings.

HUD guidelines describing how the test works were initially issued in September 1996 and revised as a final rule in September 1997. In 1998 Congress passed the Quality Housing and Work Responsibility Act (QHWRA). The 1998 Act repeals Section 202 however, developments already identified by the CHA for assessment continue to be subject to the Section 202 rules published in September 1997.

The 1998 law expands upon the conversion test requirements. If the CHA fails the physical inspection criteria of HUD's Public Housing Assessment System or continues to manage distressed properties as defined by the 1998 law, then a conversion test for these properties must be prepared. This is now an annual requirement.

Properties included in this Plan are identified based on the September 1997 rules. To be subject to the viability test, a property must be on the same or contiguous sites, have a vacancy rate of at least 10 percent (for units not in funded on-schedule modernization), and total more than 300 dwelling units.

The viability test works by converting the costs to revitalize and operate the property as public housing to a monthly number. The cost components to revitalize and operate the property include: operating costs for the property (actual or allocated); the cost to modernize the entire property; and the cost to replace equipment or components that wear out (boilers, roofs, pumps etc.) over the 20 year life of the revitalized property. The monthly revitalization cost is then compared to a monthly Section 8 cost.

The Section 8 costs include: an average Fair Market Rent (FMR) based on the bedroom sizes of the occupied units (unit-weighted); the monthly administrative fees for the Section 8 program; and amortized demolition and relocation costs (the total cost of these items spread over 20 years and converted to a monthly amount).

Included on the next page is a summary of the 1999 viability test results. CHA originally ran the viability test in 1998, however HUD disputed the formula assumptions used. CHA re-ran the test in 1999 strictly adhering to the HUD requirements in the September 1997 rules.

# DESIGNATION OF PUBLIC HOUSING ACTIVITY DESCRIPTION

| Development Name | Development (Project) Number | Designation Type | | Application Status | Date | Designation Constitute | No. of Units Affected | Coverage of Action |
|---|---|---|---|---|---|---|---|---|
| | | Current | Proposed | *(Select One:)* | | *(Select One:)* | | *(Select One:)* |
| | | E=Occupancy by only the Elderly<br>F=Occupancy by | | A=Approved; included in the PHA's Designation Plan<br>S=Submitted, pending approval<br>P=Planned application | | N=New Designation Plan<br>R=Revision of a previously-approved Designation Plan? | | P=Part of the development<br>T=Total development |
| Armour Square | IL2-44A | E | E | A | 12/01/95 | | 98 | T |
| Armour Square | IL2-44B | E | E | A | 12/01/95 | | 100 | T |
| Armour Square Annex | IL2-33 | E | E | A | 12/01/95 | | 95 | T |
| Armour Square Annex | IL2-33A | E | E | A | 12/01/95 | | 99 | T |
| Clark & Irving | IL2-58 | E | E | A | 12/01/95 | | 162 | T |
| Clark & Irving Annex | IL2-66 | E | E | A | 12/01/95 | | 96 | T |
| Clark & Irving Annex | IL2-66A | E | E | A | 12/01/95 | | 97 | T |
| Eckhart Park Annex | IL2-67 | E | E | A | 12/01/95 | | 218 | T |
| Eckhart Park Apts. | IL2-42B | E | E | A | 12/01/95 | | 181 | T |
| Flannery Apts. | IL2-42F | E | E | A | 12/01/95 | | 125 | T |
| Flannery Apts. | IL2-42G | E | E | A | 12/01/95 | | 127 | T |
| Hilliard Elderly | IL2-46 | E | E | A | 12/01/95 | | 182 | T |
| Hilliard Elderly | IL2-46 | E | E | A | 12/01/95 | | 182 | T |
| Lake Michigan Apts. | IL2-41 | E | E | A | 12/01/95 | | 124 | T |
| Midwest Terrace | IL2-43E | E | E | A | 12/01/95 | | 129 | T |
| Parkside Apts. | IL2-79 | E | E | A | 12/01/95 | | 169 | T |
| Racine Apts. | IL2-83 | E | E | A | 12/01/95 | | 212 | T |
| Wicker Park Annex | IL2-68 | E | E | A | 12/01/95 | | 120 | T |
| Wicker Park Apt. | IL2-42E | E | E | A | 12/01/95 | | 116 | T |
| Yale Apartments | IL2-60 | E | E | A | 12/01/95 | | 224 | T |
| 69th & South Chicago | IL2-49 | EF | E | S | 01/01/00 | | 125 | T |
| 91st South Chicago | IL2-80 | EF | E | S | 01/01/00 | | 149 | T |
| 91st South Chicago | IL2-80 | EF | E | S | 01/01/00 | | 149 | T |
| Albany Terrace Apts. | IL2-78 | EF | E | S | 01/01/00 | | 350 | T |
| Bridgeport | IL2-42 | EF | E | S | 01/01/00 | | 14 | T |
| Britton/Budd Apts. | IL2-48 | EF | E | S | 01/01/00 | | 173 | T |
| Clark & Webster Apts. | IL2-51 | EF | E | S | 01/01/00 | | 100 | T |
| Dickens & Burling Apts. | IL2-50 | EF | E | S | 01/01/00 | | 138 | T |
| Fisher Apts. | IL2-44 | EF | E | S | 01/01/00 | | 200 | T |
| Flannery Homes | IL2-42F | EF | E | S | 01/01/00 | | 125 | T |
| Flannery Homes | IL2-42F | EF | E | S | 01/01/00 | | 127 | T |
| Franklin & Drake Apts. | IL2-45A | EF | E | S | 01/01/00 | | 157 | T |
| Garfield Park Apts. | IL2-44 | EF | E | S | 01/01/00 | | 151 | T |
| Hattie Callner Apts. | IL2-45B | EF | E | S | 01/01/00 | | 151 | T |
| Judge Green Apts. | IL2-55 | EF | E | S | 01/01/00 | | 153 | T |
| Judge Slater | IL2-47 | EF | E | S | 01/01/00 | | 204 | T |
| Judge Slater | IL2-70 | EF | E | S | 01/01/00 | | 203 | T |
| Kenmore Apts. | IL2-10 | EF | E | S | 01/01/00 | | 136 | T |

# DESIGNATION OF PUBLIC HOUSING ACTIVITY DESCRIPTION

| Development Name | Development (Project) Number | Designation Type | | Application Status | Date | Designation Constitute | No. of Units Affected | Coverage of Action |
|---|---|---|---|---|---|---|---|---|
| | | Current | Proposed | *(Select One:)* | | *(Select One:)* | | *(Select One:)* |
| | | E=Occupancy by only the Elderly<br>F=Occupancy by | | A=Approved; included in the PHA's Designation Plan<br>S=Submitted, pending approval<br>P=Planned application | | N=New Designation Plan<br>R=Revision of a previously-approved Designation Plan? | | P=Part of the development<br>T=Total development |
| Kenneth Campbell Apt. | IL2-52 | EF | E | S | 01/01/00 | | 165 | T |
| Langley Apartments | IL2-57 | EF | E | S | 01/01/00 | | 174 | T |
| Larrabee Apts. | IL2-71 | EF | E | S | 01/01/00 | | 85 | T |
| LaSalle/Division Apts. | IL2-82 | EF | E | S | 01/01/00 | | 269 | T |
| Lathrop Elderly | IL2-RH4 | EF | E | S | 01/01/00 | | 92 | T |
| Leland/Sheridan | IL2-56 | EF | E | S | 01/01/00 | | 235 | T |
| Lincoln Perry Annex | IL2-102 | EF | E | S | 01/01/00 | | 183 | T |
| Lincoln Perry Apts. | IL2-63 | EF | E | S | 01/01/00 | | 267 | T |
| Loyola & Ridge | IL2-110 | EF | E | S | 01/01/00 | | 181 | T |
| Major Robert Lawrence Apts. | IL2-53 | EF | E | S | 01/01/00 | | 193 | T |
| Parkview Apts. | IL2-42A | EF | E | S | 01/01/00 | | 180 | T |
| Patrick Sullivan Apts. | IL2-44B | EF | E | S | 01/01/00 | | 482 | T |
| Pomeray Apts. | IL2-39 | EF | E | S | 01/01/00 | | 120 | T |
| Princeton Apts. | IL2-32 | EF | E | S | 01/01/00 | | 339 | T |
| Schneider Apts. | IL2-81 | EF | E | S | 01/01/00 | | 179 | T |
| Sheffield Annex | IL2-72 | EF | E | S | 01/01/00 | | 206 | T |
| Sheffield Apts. | IL2-61 | EF | E | S | 01/01/00 | | 188 | T |
| Sheridan & Devon Apts. | IL2-73 | EF | E | S | 01/01/00 | | 450 | T |
| Shields Apartments | IL2-42 | EF | E | S | 01/01/00 | | 116 | T |
| Washington Park | IL2-34 | EF | E | S | 01/01/00 | | 92 | T |
| Washington Park | IL2-59 | EF | E | S | 01/01/00 | | 22 | T |
| William Castelman Apts. | IL2-40 | EF | E | S | 01/01/00 | | 200 | T |
| William Jones Apts. | IL2-42 | EF | E | S | 01/01/00 | | 116 | T |

**Electronic Note:**

Due to the size of the Budget documents, they will be transmitted electronically under separate cover within 24 hours from the date of this electronic submission.

# Chicago Housing Authority: Plan for Transformation

Improving Public Housing in Chicago
And the Quality of Life

January 6, 2000

# Executive Summary

The Chicago Housing Authority (CHA) owns 38,000 units of public housing, which includes some of the worst housing in America. Despite repeated attempts at reform, real and lasting change has been elusive. To transform public housing in Chicago, this Plan proceeds on a number of fronts.

## Capital Program

The Agency can anticipate $1.5 billion in capital funds over the next ten years, assuming constant funding levels. This compares with capital needs in excess of $3.0 billion. The Agency will demolish upwards of 18,000 obsolete housing units, mostly open gallery style high-rises. By removing these units from the inventory, the Agency will be able to concentrate its capital resources to rehabilitate/redevelop about 25,000 units. While the overall loss of project-based housing is concerning (a net loss of approximately 13,000 units), there is no alternative. The remaining inventory will be built/rehabilitated to a standard of quality sufficient to attract a mix of incomes so that public housing does not again become home to extreme concentrations of poverty. Moreover, enough units are produced to accommodate all existing lease-holders.

Although this plan is predicated on ten years of funding, the Agency intends to accelerate these improvements over five to seven years by leveraging its assets and future funding streams. Moreover, to attract additional private funds, and to access needed development capacity, the Agency will seek development teams/development proposals for all of its family properties. The determination of which teams/proposals are selected will be accomplished through a redevelopment process that will include extensive resident and community input.

Overall, it is projected that 6,000 households will need to be relocated to private market housing (Section 8) as a result of redevelopment over the next five years, a rate that is less than the growth of the Section 8 Program in recent years. Still, the Agency will monitor the pace of relocation to identify and respond to market absorption issues which may arise. All affected households will receive relocation assistance and, provided they remain lease-compliant, will be allowed to return to public housing following redevelopment.

## Property Management

The Agency will get out of the business of managing real estate, resulting in lower costs and better service. By June 2000, all properties currently managed by the CHA will be transferred to third-party, professional management organizations. Resident Management Corporations (RMCs) which are fully operational as of October 1, 1999 will remain in place. Unlike past experiences with private management, however, this time the Agency will actually provide the private firms and RMCs with the authority, the responsibility, and the resources to get the job done. In turn, the Agency will develop its contract monitoring and oversight capabilities to assure high standards of performance.

## Human Capital Development

Residents of public housing will be treated as full citizens of the City of Chicago and will have access to the same level of services. Rather than attempt to replicate those services, a strategy that only serves to further isolate public housing and its residents, and for which the CHA has neither the resources nor the skill, the Agency will invest in development-based outreach workers who will help residents to access services in the community. It is anticipated that many of these outreach workers, who will receive professional training, may be residents themselves. The Agency also plans to aggressively seek and obtain additional outside resources to meet the human capital needs of its residents.

## Protective Services

Consistent with the principle that residents of public housing will be treated as full citizens of the City of Chicago, the Agency recently transferred policing functions to the Chicago Police Department. Combined with a Department of Justice Community Oriented Policing Strategy (COPS) grant, the number of law enforcement personnel assigned to the CHA will significantly increase. As distressed properties are demolished, however, the need for dedicated law enforcement services will greatly diminish. The Plan also provides for at least 10-hours of security coverage daily at each elderly building and funds the tenant patrol program at current levels, although supervision of tenant patrols will be transferred to the private managers and RMCs.

## Admissions and Occupancy Policies

New and proposed policies are intended to encourage the development of stable communities and to reward work and responsibility. Key initiatives include: rent incentives for working families, higher standards of lease compliance, and acknowledging kinship care to keep families together.

## Section 8

Continuing with the vast improvements in the administration of the Section 8 program in recent years under private contract, the Agency will expand its landlord outreach, mobility counseling, and contract monitoring functions. Additionally, the Agency will establish a new “access improvement” fund to help landlords make units accessible to persons with disabilities.

## Section 3 and MBE/WBE

Over the next ten years, the CHA will invest over $6.3 billion in the local economy, representing the combined public housing and Section 8 budgets. The Agency is committed to assuring that this period becomes a real time of opportunity for minority businesses and for other disadvantaged firms and workers.

## HUD Waivers and Requests

Accompanying this Plan is a list of various waivers, commitments and requests that would greatly facilitate implementation. These range from relief from restrictive development rules to assurances of predictable funding.

## Towards a New Role for the CHA

This Plan contemplates much more than the physical transformation of public housing. It envisions a new role for the CHA. In the past, the CHA was primarily an owner and manager of public housing. In the future, the CHA will be a facilitator of housing opportunities. It will oversee a range of housing investments and subsidy vehicles. Where appropriate, it will own housing, but it will just as likely provide financial assistance to other private and non-profit development organizations to expand housing opportunities.

As outlined more fully in the Background section of the document, this Plan has been the result of an extensive public comment process. The Agency recognizes that resident and public comment does not end with publication of this document. CHA is committed to long-term broad community participation in the transformation of public housing in Chicago.

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# Introduction

This Plan for Transformation (Plan) outlines the major program changes, policy directions, and organizational initiatives of the Chicago Housing Authority (CHA) over the next several years.

Four events have converged to compel this Plan.

- First, as required under the 1998 Quality Housing and Work Responsibility Act (QHWRA), public housing authorities (PHAs) must undertake annual and five-year plans for fiscal years beginning January 1, 2000.

- Second, on June 1, 1999, the CHA was returned to local control. As a consequence, this Plan provides an opportunity for the new leadership team to communicate its transformation plans.

- Third, at the time that the CHA was returned to local control, the City entered into a Memorandum of Understanding (MOU) with the United States Department of Housing and Urban Development (HUD). The terms of the MOU required that 1. The Agency prepare a "Performance Compact" in six months that would "establish an action Plan and identify the regulatory flexibility, legislative flexibility, and resources necessary to achieve performance benchmarks on which we will mutually agree… HUD intends to approve an acceptable plan under the Moving to Work demonstration authority provided by Section 204 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996."

- Fourth, federal law mandates the demolition of approximately 18,000 units of CHA housing.

Submitted along with this Plan are the following companion documents:

- The Annual Public Housing Agency Plan

- The Five-Year Public Housing Agency Plan

- The Agency's FY 2000 Operating Budget

- A list of funding commitments, waivers and requests necessary to support the Plan.

# Background

On September 30, 1999, the Agency published its draft Plan for Transformation, along with its draft Annual and Five-Year Agency Plans and its List of Waivers and Requests. Collectively, those documents outlined a fundamentally new approach to public housing in Chicago. The case for change was obvious and urgent, including:

- A high concentration of extremely poor families.
- A large stock of physically obsolete family housing plagued with crime and drugs.
- A new Federal policy environment that includes mandatory building closure rules, affirmative efforts to deconcentrate poverty, and stricter performance standards, especially in the area of physical condition.
- Limited capital funds to meet needs.
- Excessive overhead costs and a lack of internal management capacity.
- Resident programs that were duplicative, poorly coordinated, and without substantive performance measures and outcomes.

**Resident & Public Participation Process**

The CHA adopted a comprehensive approach to maximize public input on the Plan.

**Resident Involvement**

In accordance with QHWRA, a Resident Advisory Board (RAB) was created to provide recommendations and comments on the Agency Annual and Five-Year Plan. The RAB consisted of the Central Advisory Council (CAC) and representatives of the Section 8 existing Certificate and Voucher Program (hereafter referred to as Section 8)[1]. The CHA provided technical assistance funds for the RAB/CAC to assist in their analysis of the Plan. The RAB/CAC created seven subcommittees to address different aspects of CHA activities, receive training on the provisions of the QHWRA, and formulate recommendations on the draft Plan to submit to the CHA. The CHA staff met with the subcommittees and the full RAB/CAC 15 times to review all aspects of the draft Plan prior to its release in September of 1999. The RAB/CAC provided CHA with extensive and detailed comments and recommendations during the public comment period.

The CHA met with the RAB/CAC both during and after the comment period ended to further amend the Plan based on resident feedback. Lengthy negotiating sessions on topics such as Resident Management Corporations, Section 3, private management contracts and relocation and redevelopment activities took place throughout the months of November and December. The CAC disagrees with portions of the Plan and has forwarded those comments and objections to the Agency.

[1] Under QHWRA, all Section 8 certificates and vouchers are to be converted to a new Section 8 Housing Choice Voucher Program. These conversions are now occurring upon lease-up or at lease-renewal.

**Task Forces**

The CHA's planning process has been one of intensive engagement with residents and the public. Public housing residents, Section 8 residents and members of interested civic, fair housing and community development organizations, as well as sister agencies and philanthropic organizations participated in task forces that provided input on CHA's performance goals and identified potential action items. These task forces covered four areas: good neighborhoods for public housing families, expanding housing options for housing choice voucher holders, service connections for both public housing residents and voucher holders, and quality of life for seniors. The sessions were rich discussions of the goals and challenges faced by CHA and other organizations in delivering quality housing and services, and yielded valuable suggestions.

**City-wide Public Meetings**

The Agency held a total of 23 Town Hall meetings, including one at each family public housing development, and briefings for senior developments by the regions into which senior resident leadership is organized. The CHA also held four regional public meetings at community venues convenient to residents of the north, south, west and central parts of the City. The CHA also conducted over 50 briefings for civic, community development, housing service and philanthropic organizations, educational institutions, faith leaders, elected and appointed officials, and others. In accordance with QHWRA, a public hearing was held at the McCormick Place Convention Center on November 16, 1999, the close of the comment period. Buses were provided to transport residents from each major development to the McCormick Place.

**Notification**

All meetings were advertised in 31 community and major regional newspapers, notifications were included with rent notices to all public housing residents, and thousands of mailings were made to interested organizations and individuals throughout Chicago. Finally, in addition to the print media, CHA discussed the draft Plan on community talk radio and television. The Plan was available at every public library, each Local Advisory Council Office, every CHA management office, CHA headquarters, and on the Internet. A toll free number was established to enable residents and the public at large to call with questions or to request a copy of the document. In all, CHA distributed over 3,600 copies of the draft Plan.

**Public and Resident Comments**

Included as an attachment to the Agency's Annual Plan is a list of the recommendations made by the RAB and a description of the manner in which the CHA addressed each of these recommendations. The CHA conducted public hearings on its Plan and considered all public comments. In consultation with the RAB, the CHA made changes to its Plan based on these comments. These comments can be organized into three main areas:

1. **Comments requesting greater clarification or articulation of Plan elements, including:**

   - How relocation would proceed and the rights of affected residents.
   - Timeframes for when redevelopment would occur.
   - The mechanics of HUD's "Section 202 Viability" test and the results of such test in Chicago.
   - Estimated number of units to be rehabilitated/redeveloped.

- The roles and responsibilities of private managers and how services would improve under such arrangements.
- How the Agency will comply with applicable accessibility and fair housing requirements in the management and redevelopment of its housing.
- The redevelopment process, including the selection of developers, the assignment of capital resources among competing developments, and the participation of residents and community partners in that process.
- The allocation of Agency resources within the context of its proposed "block grant."
- The scope of non-shelter services to be provided and, in particular, the role of "service connectors" in the Agency's new model for promoting human capital development.
- The coordination between these non-shelter services and professional private management.
- The need for, and implications of, the Agency's waiver requests.
- Security Plans.

**2. Comments expressing dissatisfaction with the current service provided by the CHA and the need for vast improvements, including:**

- Providing residents with adequate notice in the event of relocation.
- Expanded security services and better communication between law enforcement/security personnel and residents.
- Condition of the units.
- Reducing inspection turnaround times in Section 8.
- Fair but consistent lease enforcement.

**3. Comments either disagreeing with, or indicating concern over, major plan elements and principles or plan assumptions, including:**

- The loss of several thousand public housing units in the face of a tremendous shortage of affordable housing in Chicago.
- The ability of the private rental market to absorb the families to be relocated from non-viable buildings that will be torn down.
- The need to maintain "fixed" housing resources, as opposed to tenant-based assistance.
- The concentration of Section 8 vouchers in predominately minority, high poverty areas.
- The ability to provide essential social services to current residents to be relocated under the Section 8 program.
- Assurances that relocated residents will be allowed to return to public housing following redevelopment.
- Resources should be targeted to the poorest families, not diverted to higher income families in order to create mixed-income communities.
- The ability to implement the Plan if the Agency does not receive the special requests and waivers.
- The cost estimates used to determine the overall capital needs.
- The ability to address the ongoing maintenance, environmental remediation, and ADA/504 accessibility issues from occupied units during the implementation of the Plan.
- The CHA notes that the CAC objects to the Authority's submission of the Plan for Transformation prior to the HUD national deadline of January 31,2000 for submission of the Annual and 5 Year Plan.

The majority of public comments confirm the need for a complete transformation of the Agency.

**Plan Organization**

The remainder of this document is organized into eleven sections, covering each of the major areas of the Plan. Some subjects, such as accessibility, are covered under more than one section throughout the Plan.

- Goals & Core Principles
- Capital Program
- Relocation
- Property Management
- Lease and Occupancy
- Human Capital Development
- Protective Services
- Section 8
- Section 3 & MBE/WBE
- Consolidated Budget
- Timeframes and Performance Standards

# Goals & Principles

The goals under this Plan are to:

- Provide quality housing opportunities to very low and low-income households in mixed-income settings.
- Affirmatively further fair housing and assist in creating communities that are intolerant of discrimination.
- Assure that residents have access to local, state, and federal resources for which they are eligible.
- Contribute to the improvement of the neighborhoods and communities where public housing is located.
- Provide greater housing choice.
- Assure a smooth transition for families relocating as a part of CHA's redevelopment activities, minimizing the disruption on the lives of CHA families.
- Offer all lease compliant families the right of return to a new or rehabilitated public housing unit.
- Achieve standards of excellence in the delivery of services and in the administration of programs.
- Expand the number of accessible units and comply with all applicable federal, state, and local disability laws.
- Encourage business development opportunities for minorities and disadvantaged firms and job opportunities for residents, resident owned businesses, and other low-income workers.
- Maintain existing occupied units in a decent safe and sanitary condition during the implementation of the Plan, including abatement of environmental hazards and provision of 504 accessibility.

In pursuit of these goals and in the development of this Plan, CHA has adopted the following core principles:

- Residents will be treated as any other citizen of the City of Chicago. As such, the Agency will help residents access and connect to services in the community.

- The role of the CHA is to invest in or facilitate housing opportunities for very low and low-income households, including persons with disabilities. With the flexibility made possible by recent legislation, the Agency should no longer view itself as primarily an owner or manager of public housing. More broadly, the Agency can own, lease, finance, or subsidize housing opportunities as circumstances warrant.

- The CHA's priority should be to invest in properties where the Agency can assure that (1) it has the resources to sustain these properties through their useful life, (2) the property can attract and retain a mix of incomes, and (3) the housing does not stigmatize its residents.

- The delivery of management services should be property-based. On-site personnel should have the resources and authority to manage effectively.

- To the extent that a competitive market already exists to provide any given service, from architectural design to property management, the CHA should use that market to maximize service for available resources.

- The CHA will protect the rights of persons with disabilities.

- All families living in CHA-subsidized units should be working towards economic self sufficiency by seeking employment and educational opportunities. The CHA will support families in these efforts by facilitating connections to supportive services and will also encourage and support those families who attain self-sufficiency to seek homeownership and other housing opportunities in the private market through other government, non-profit and philanthropic programs.

- The CHA is committed to fully implementing this innovative and comprehensive Plan for Transformation, but recognizes that full implementation requires full approval of the Plan by HUD and where necessary, legislative revisions. The Authority is committed to assuring that all CHA residents affected by the Plan are assured access to replacement housing, a compassionate relocation process and to this end, in consultation with the RAB/CAC, will make any revisions necessitated by reduced funding, rejection of waivers, and/or legislative change request. The Agency agrees with HUD and the CAC that relocation must be consistent with and directly linked to the availability of affordable housing for very low and low income relocatees.

- The CHA will require the involvement of minority and women owned businesses and enforce Section 3 requirements.

# Capital Program

At current funding levels ($148 million in 1999), the Agency can expect approximately $1.5 billion in capital funds over the next ten years, $1.1 billion of which is available for the actual hard costs of rehabilitation/redevelopment. In contrast, the Agency's capital needs exceed $3.0 billion for the current inventory, a figure that includes only the cost to "fix as-is" and does not consider redesign. Additionally, Section 202 of the 1996 HUD appropriations bill mandates demolition of certain "distressed" developments that cannot be revitalized for less than the cost of vouchers, affecting more than 40 percent of the Agency's stock

Given these fiscal and legislative parameters, and given the untenable conditions under which many residents live, the Agency will demolish upwards of 18,000 units, primarily high-rise family properties for which there is no reasonable potential for renovation. This will allow the Agency to rehabilitate/redevelop approximately 25,000 units to a market standard that will assure long-term viability. While the Agency is intent on preserving as many hard units as possible, especially in light of the demand for affordable housing in Chicago, the demolition actions are practically and legally required. Still, this Plan will produce enough units so that, following redevelopment and rehabilitation, the Agency can accommodate all lease-compliant families residing in CHA units as of October 1, 1999.

Altogether, the Agency estimates that a total of approximately 6,000 households will need to be temporarily or permanently relocated over the next five years (See Relocation section of this document regarding both relocation estimates and services). Although it may not be possible to accommodate residents in the same unit/building or development that they formerly occupied, all families temporarily relocating will be permitted to remain or return to public housing following redevelopment, provided they remain lease-compliant.

Because of the urgent need for these improvements, the Agency plans to undertake this work over five to seven years by leveraging its assets and future capital funding streams. In other words, although it will take ten years worth of capital funds to complete this Plan, the Agency will finance these improvements over a shorter period by borrowing against funds from future years, when the need for capital will be much less.

In addition to funding all existing redevelopment commitments – for example, on-going planning and redevelopment efforts at Gov. Henry Horner Homes or Loomis Courts, Jane Addams Homes, Robert H. Brooks Homes and Grace Abbot Homes (ABLA) – the Plan fully funds the cost to rehabilitate all senior and viable scattered site units. The Plan also fully funds, after allowing for modest density reduction, the cost to rehabilitate all family properties not subject to "Section 202." The Section 202 properties consist of eight gallery high rise and five low rise and mid rise properties, accounting for some 14,000 units. The Agency does not have sufficient resources to redevelop each of these properties. To determine which of the Section 202 sites will receive redevelopment funding, and to encourage additional private financing sources, the Agency will solicit proposals from development teams. It has also requested flexibility under the Section 202 rule to allow for the rehabilitation of the mid-rise and low rise properties. Resident representatives and community partners will be involved in both establishing the criteria for selecting developers and in the actual selection process. Additionally, the Agency will provide the residents at each site with technical assistance funds to help in shaping the development program and/or re-use plans for each property.

The remainder of this section explains more fully the Agency's demolition plans, the impact of Section 202, projections of funding availability, the allocation of capital funds, the redevelopment process and accompanying selection criteria, and other redevelopment issues such as the implications of the Gautreaux Court Order.[2]

**Section 202 - Mandated Demolition**

Under Section 202[3], demolition is required when the monthly per-unit cost to renovate and maintain any contiguous property with more than 300 units and with a vacancy rate in excess of 10 percent exceeds the monthly cost of a housing voucher. Of the Agency's 38,000 units, approximately 14,000 were subject to this test and all 14,000 failed (several thousand more units were not technically subject to the test because the Agency had already agreed to demolish them under HOPE VI and other existing redevelopment projects). Of the properties that failed under the current regulation, eight contain or are comprised of open gallery high rises and five are low rise and mid rise properties. While the Agency agrees that the gallery high rises are not viable, it believes that with proper investment and management, many if not all of the low rise and mid rise properties subject to Section 202 can be viable. Consequently, the Agency has requested from HUD an augmentation of the viability test to allow it to retain these properties if 1) sufficient market interest exists for redevelopment and 2) the properties can attract a mix of incomes. The CHA will not consider proposals to rehabilitate the open gallery high rises.

**Gallery Style High Rises**

Of the Agency's 38,776 units, approximately 15,000 units are contained in open gallery style high rises. Open gallery style is defined as eight or more stories with hallways and elevator entrances that are fully or partially exposed. The Plan for Transformation calls for the demolition of these units.

These gallery high rises were built between 1953 and 1966. From the very beginning, CHA experienced great difficulties with this building design, ranging from problems with heating systems to frequent elevator failures. Design flaws, coupled with a lack of maintenance and limited capital improvements since initial construction, have rendered these buildings vulnerable to system failures, particularly in the winter months. Furthermore, recent experience demonstrates that even after spending significant funds for emergency repair and rehabilitation, the CHA cannot guarantee that a gallery high rise can survive the winter. Renovation of these buildings is not economically feasible.

**Funding Availability**

In 1999, the Agency received approximately $148 million as its formula share of capital funds under the Federal Comprehensive Grant Program (soon to be renamed the Public Housing Capital Fund). Assuming constant funding at this level, the Agency would receive approximately $1.5 billion over 10 years (FY 2000 - FY 2009), including $33.9 million in carry-over funds from FY 1999. In previous years, the Agency dedicated only about 57 percent of its capital grant for hard costs, with significant amounts spent on such non-capital uses as law enforcement and general administration. To retain as many hard units as possible, the Agency has

[2] Pursuant to a 1987 order of the Federal District Court in Gautreaux vs. CHA et. al., a Receiver, Daniel E. Levin and The Habitat Company, has and exercises all powers of CHA respecting the development of CHA non-elderly housing. Throughout the Capital Program section of the Plan for Transformation, "CHA" will signify CHA and/or the Receiver, acting in their respective capacities.

[3] "Section 202" refers to Section 202 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996. As required under this law, a cost test must be performed for all affected properties. See the Annual Plan for a more complete description of the cost test and the results.

restructured its budget to substantially increase the funds for building improvements, shown below. However, even with these adjustments, there are insufficient funds to repair or replace 38,000 units.

**Ten Year Capital Plan Summary Budget**

| Category | Amount | Percent |
|---|---|---|
| Project Management | $48,000,000 | 3% |
| A&E Services and Resident TA | $94,288,000 | 6% |
| Capital Maintenance | $156,000,000 | 10% |
| Building Improvements | $1,111,837,200 | 74% |
| Contingency | $111,030,000 | 7% |
| **Total** | **$1,513,900,000** | **100%** |

This amount, even after budget restructuring, is far less than the more than $3.0 billion that the Agency would need to rehabilitate all of its existing stock.

Included with the List of Commitments, Waivers and Requests that accompanies this Plan is a request that the Agency's capital grant be frozen for ten years so that it can be assured of this funding stream. A one percent reduction in the Agency's current capital grant represents about $15 million over ten years. Additionally, the Agency has requested funds apart from its annual capital funds to pay for demolition ($85 million) and relocation and related counseling services ($25 million).

**Allocation of Capital Funds**

For purposes of funding allocations, the Agency has grouped its properties into five main categories: Existing Redevelopment Commitments, Senior Buildings, Scattered Sites, Non-202 Family Properties, and 202 Family Properties. Of the $1.1 billion projected to be available for hard costs for actual rehabilitation/redevelopment, each category is targeted to receive the following amounts:

- **Category 1: Existing Redevelopment Commitments.** A total of eight property clusters have either approved redevelopment plans or plans that are well along in the process. This represents 9,561 units, of which 3,659 are occupied. The capital program includes $149 million to fund these existing redevelopment projects, many of which are subject to court orders. These funds are needed to supplement other funding such as HOPE VI. Redevelopment plans for two of these properties – ABLA and Madden Park Homes/Ida B. Wells Homes – have not been finalized. Consequently, the total number of units anticipated to be demolished (7,724) and rebuilt (5,353) for this category is based on current estimates and may be revised once redevelopment plans are finalized.

- **Category 2: Senior Buildings**. The Agency has 58 senior buildings, totaling 9,480 units. The capital program includes $350 million for complete rehabilitation. This figure includes funds to install air conditioning, required accessibility improvements, and other amenities.

- **Category 3: Scattered Sites**. The Agency owns 2,922 scattered site units. Of these, the Agency estimates that 8 percent (236 units) are in such poor physical condition that they do not warrant continued investment. For the remaining 2,686 scattered site units, the Agency will allocate $77 million for their rehabilitation. The Agency will conduct a detailed physical needs assessment of its scattered site program to determine the actual units that will be disposed of or demolished. The Agency plans to work with non-profit organizations and other groups on creative re-use options. No scattered site units will be demolished that can be reasonably rehabilitated as public housing.

- **Category 4: Non-202 Family Properties**. A total of ten family properties (3,051 units) are not currently subject to the Section 202 viability test. The capital program allocates $107 million to these properties. This funding is based on the cost to rehabilitate all units with the exception of: (1) Lawndale Complex, which is slated for demolition, and (2) Washington Park low-rises, where it is estimated that half the units will be demolished based on their condition. In order to maximize funds, the CHA will seek development partners for Category 4 properties (see process described below). Because of their age and design, modest density reduction is also anticipated for a number of the properties in this category. Following redevelopment in Category 4, the Agency's goal is that the total number of public housing units be not less than the current number of occupied units (2,254).

- **Category 5: Family Properties Subject to Section 202.** The capital program allocates the remaining $429 million to the 13 Section 202 properties and Randolph Towers (The Agency has agreed to review with the CAC and the Washington Park LAC, the feasibility of retaining this recently renovated structure which was not originally subject to the Section 202 viability test). The CHA will make available the remaining $429 million to rehabilitate or redevelop these properties. While this amount cannot fully replace all units identified in Category 5, it is estimated that this funding will produce at least 5,000 new or rehabilitated public housing units. To the extent that total funding available to the Agency is less than the amounts projected, fewer dollars will be made available to the Category 5 properties.

In order to accelerate capital improvements, CHA proposes to leverage its assets and future funding streams through a minimum of two general financing initiatives. The first financing initiative covers the construction costs to rehabilitate the senior and scattered site properties (Categories 2 and 3) and will likely occur in late 2000. Construction and rehabilitation schedules for Categories 4 and 5 will dictate the exact timing of the second financing, estimated to be in the Fall of 2001.

**Summary of Capital Program**

| Grouping | Funding Allocation | Existing Units | Occupied | Demolition | Net Hard Units | Net Loss of Hard Units |
|---|---|---|---|---|---|---|
| | | | | | | |
| Category 1 – Existing Redevelopment Commitments | $149,000,000 | 9,561 | 3,659 | 7,724 | 5,353 | 4,208 |
| Category 2 – Senior Buildings | $350,000,000 | 9.480 | 8,044 | 0 | 9,480 | 0 |
| Category 3 – Scattered Sites | $77,000,000 | 2,922 | 2,400 | 236 | 2,686 | 236 |
| Category 4 – Non-202 Family Properties | $107,000,000 | 3,051 | 2,254 | 797 | 2,254 | 797 |
| *Subtotal* | *$683,000,000* | *25,014* | *16,357* | *8,757* | *19,773* | *5,241* |
| Category 5 – Low-rises, Mid-rises, and non-gallery high rises | N/A | 4,876 | 3,987 | 889 | N/A | N/A |
| Category 5 – Gallery High-rises | N/A | 8,886 | 4,146 | 8,886 | N/A | N/A |
| *Subtotal* | *$429,000,000* | *13,762* | *8,133* | *9775* | *5,000* | *8,762* |

| | | | | | | |
|---|---|---|---|---|---|---|
| **Totals** | $1,112,000,000 | 38,776 | 24,490 | 18,532 | 24,773 | 14,003 |

## Chicago Housing Authority
## Capital Plan
*Source: Unit Status Report 10/01/99

| | Existing Units* | Occupied Units* | Demo Units | After Revitalization Total | After Revitalization Public Housing | CGP Funding | GGP Cumulative | Hope VI and Other Federal Funds |
|---|---|---|---|---|---|---|---|---|
| ***Category 1 - Existing Redevelopment Commitments*** | | | | | | | | |
| Gov. Henry Horner Homes | 1,743 | 682 | 1,201 | 1,136 | 1,086 | 32,200,000 | | 73,952,120 (1) |
| Frances Cabrini Extension North | 926 | 152 | 926 | 2,300 | 700 | 25,000,000 | | 58,993,750 |
| ABLA (2) | 3,235 | 1,079 | 2,776 | 3,278 | 1,463 | 18,000,000 | | 51,953,250 |
| Wells/Madden/Darrow/Wells Extension (3) | 2,891 | 1,426 | 2,821 | 2,530 | 1,008 | 39,000,000 | | 43,300,000 |
| Robert Taylor Homes B HOPE VI (4) | - | - | - | 251 | 251 | - | | 23,500,000 |
| Raymond M. Hilliard Center | 710 | 307 | | 710 | 390 | 33,500,000 | | |
| Washington Park Homes (5) | 56 | 13 | - | 56 | 14 | 1,300,000 | | |
| Lakefront (6) | - | - | - | 964 | 441 | - | | 40,121,148 |
| *Subtotal* | *9,561* | *3,659* | *7,724* | *11,225* | *5,353* | *$149,000,000* | *$149,000,000* | *$291,820,268* (7) |
| ***Category 2 - Senior Developments*** | *9,480* | *8,044* | *-* | *9,480* | *9,480* | *$350,000,000* | *$499,000,000* | |
| ***Category 3 - Scattered Sites*** (8) | *2,922* | *2,400* | *236* | *N/A* | *2,686* | *$77,000,000* | *$576,000,000* | |
| ***Category 4 - Non-202 Family Properties*** (9) | | | | | | | | |
| Cabrini Ext. Lincoln | 18 | 18 | | | | | | |
| Lake Parc Place | 300 | 235 | | | | | | |
| LeClaire Courts | 300 | 270 | | | | | | |
| Washington Park Homes Low-rises | 488 | 226 | | | | | | |
| Lawndale Complex | 187 | 1 | | | | | | |
| Lawndale Gardens | 128 | 120 | | | | | | |
| Julia C. Lathrop Homes | 925 | 747 | | | | | | |
| Bridgeport Homes | 155 | 136 | | | | | | |
| Wentworth Gardens | 422 | 386 | | | | | | |
| Gov. Frank Lowden Homes | 128 | 115 | | | | | | |
| *Total* | *3,051* | *2,254* | *797* | *N/A* | *2,254* | *$107,000,000* | *$683,000,000* | |
| ***Category 5 - 202 Family Properties*** (10) | | | | | | | | |
| ***Mid-rises and Low-rises*** | | | | | | | | |
| Frances Cabrini Rowhouses | 586 | 466 | | | | | | |
| Trumble Park Homes | 486 | 382 | | | | | | |
| Harold L. Ickes Homes | 1,006 | 823 | | | | | | |
| Dearborn Homes | 800 | 603 | | | | | | |
| Altgeld Gardens - Phillip Murray Homes | 1,998 | 1,713 | | | | | | |
| *Subtotal* | *4,876* | *3,987* | *889* | *N/A* | *N/A* | | | |
| ***Gallery High-rises*** | | | | | | | | |
| 1230 N. Burling | 134 | 106 | 134 | | | | | |
| Frances Cabrini Extension South | 597 | 474 | 597 | | | | | |
| William Green Homes | 968 | 550 | 968 | | | | | |
| Rockwell Gardens | 1,136 | 439 | 1,136 | | | | | |
| Stateway Gardens | 1,644 | 689 | 1,644 | | | | | |
| Robert Taylor Homes A | 1,734 | 785 | 1,734 | | | | | |
| Robert Taylor Homes B | 2,050 | 774 | 2,050 | | | | | |
| Washington Park Homes High-rises | 468 | 192 | 468 | | | | | |
| Randolph Towers (11) | 155 | 137 | 155 | | | | | |
| *Subtotal* | *8,886* | *4,146* | *8,886* | *N/A* | *N/A* | | | |
| *Total, Category 5* | *13,762* | *8,133* | *9,775* | *TBD* | *5,000* | *$429,000,000* | *$1,112,000,000* | |
| ***TOTAL ALL CATEGORIES*** | *38,776* | *24,490* | *18,532* | *TBD* | *24,773* | *$1,112,000,000* | | |

**Notes:**

**1.** Includes $55,516,820 for Phase I of Gov. Henry Horner Homes.
**2.** Units and CGP $ needed are estimates pending final master plan.
**3.** Pending 2000 Hope VI Application for $35 million. Have $8.3 million in MROP Funds. Unit counts and mix may change based on results of ongoing master planning process.
**4.** Only demolition of five (5) buildings; all units to be replaced off site. Demolition units shown in Category 5.
**5.** Sale of 56 CHA units to non-profit developer in exchange for lease of 14 newly renovated units and 42 Section 8 units in nearby development.
**6**. Under Consent Decree w/Lakefront Community Organization, CHA is to develop 241 replacement units for Lakefront buildings in North Kenwood-Oakland neighborhood (which will be built on several sites) and an additional 200 outside of North Kenwood-Oakland.
**7.** Does not include an additional $21 million for which the Court in the Gautreaux case has not designated a location.
**8.** Assumes 8% of units do not warrant continued investment.
**9.** Assumes demolition is equal to number of vacant units.
**10.** The number of units which will be rebuilt for each sub-category will not be known until the planning process has been completed. However, a minimum of 5,000 is projected for all Category 5.
**11.** Not subject to 202 but is a Gallery Style High-rise.

**Redevelopment Process**

A Working Group comprised of representatives from CHA, the LAC, the City of Chicago, community partners, the Gautreaux plaintiffs/Receiver (where appropriate) and other appropriate parties will use the process described below to redevelop Category 4 and 5 properties. The Working Group will consider proposals, consistent with this Plan, that could include rehabilitation, new construction or a combination of the two. (All types of activity will be collectively called "redevelopment" hereafter.) The Working Group will accept proposals that offer the greatest value, based on criteria discussed below. The Working Group expects to obtain proposals that will attract other sources of funds, thereby maximizing the number of public housing units that can be rehabilitated/produced. For the Category 5 properties, this process will determine which properties are truly viable and can, with continued investment, be maintained at a market standard and attract a mix of incomes over time. In the case of the Category 4 properties, where there is not sufficient interest in or advantage to private investment, the Agency will renovate these properties as traditional public housing. All public housing units will be available first to lease-compliant residents as of October 1, 1999.

The redevelopment process chart defines the tasks and responsibilities within the Working Group.

**Redevelopment Process Chart for Category 4 and 5 properties**

| TASKS -- STAGE ONE | CHA | CAC | LAC | Habitat | City | Gautreaux Plaintiffs | Community | HUD |
|---|---|---|---|---|---|---|---|---|
| (1) Establish overall criteria for redevelopment & rehabilitation proposals. Establish selection criteria to evaluate responses | X | X | X | X | X | X | X | X |
| (2) Using criteria from Step (1), issue Request for Qualifications (RFQ) for development teams. Respondents submit qualifications for developing mixed-income residential housing for specific properties. Respondents may submit proposals to work with more than one site. | X | | | | | | | |
| (3) Act as selection panel and recommend development teams at each site. For sites with adequate interest, one or more teams may be selected per site. | X | | X | X | X | X | X | |
| (4) Confirm selection of development teams | X | | | X | | | | |

| TASKS -- STAGE TWO | CHA | CAC | LAC | Habitat | City | Gautreaux Plaintiffs | Community | HUD |
|---|---|---|---|---|---|---|---|---|
| (5) LAC, residents, and community work with selected developers from Stage 1 to prepare proposals for redevelopment. | | | X | | | | X | |
| (6) Rate and Rank final proposals. Consult with Gautreaux Court to ensure compliance and, where needed, make requests for Revitalizing Area designation. | X | | X* | X | X | X | | |

* NOTE: In Step 6, LAC participation in selection process contingent upon extent of involvement in any redevelopment proposals received.

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| (7) CHA Board and Habitat selects proposals for funding, determines allocation of capital funds. Based on availability of dollars allocated, establish phasing of redevelopment. | X | | | X | | | | |
| (8) Redevelopment Begins | | | | | | | | |

Re-use planning will begin for any Category 5 property where insufficient interest exists for redevelopment (after Stage One) or if the property's development proposal is not selected for funding (after Stage Two).

**Proposal Criteria**

The Working Group will work to develop the criteria for selection of both development teams (Stage One) and development proposals (Stage Two). Such criteria will include the following:

**Minimum Threshold Criteria**

All proposals must at least demonstrate the following to be considered for funding:

- In the case of proposals involving the construction of new public housing, compliance with the Gautreaux consent decree and the capability of receiving a Revitalizing Order from the Court (See Gautreaux discussion).
- Financial feasibility, including realistic assumptions with respect to allocations of funds from other public and private sources and supported by market data.
- Consistent with the Plan, proposals which include demolition should provide justification for new construction over rehabilitation.
- Long-term ability to sustain affordability.
- Compliance with Fair Housing and ADA/504 requirements and, where practical and appropriate, the Chicago Department of Housing's new "visitability" standards.
- Compliance with CHAs M/WBE and Section 3 requirements.

**Selection Criteria**

Proposals that meet the minimum threshold criteria will then be evaluated on the strength of the following:

- The extent to which the proposed redevelopment or rehabilitation meets a market standard of quality and can, over time, attract and retain a mix of incomes.
- The extent to which the proposed project leverages private funds.
- The extent to which the proposal accommodates lease-compliant CHA residents.
- The extent to which the proposal uses public funds (CHA, city, state, federal) and other public assets efficiently, such that the impact of public resources is maximized.

- The extent of non-housing benefits to residents such as funding for or provision of social services, business and employment opportunities, community facilities and green spaces.

- The extent to which public housing units relate to and are integrated into the larger community, including mixing public housing units with affordable and market rate units in the development, and providing new development and rehabilitation that is compatible with the surrounding neighborhood.

- The extent to which proposals consider strategic plans developed by the LAC's for their respective sites.

- The extent to which proposals have a commitment to include minority and women owned businesses, resident owned businesses and Section 3 resident employment.

| Timeline for Redevelopment Process | Date |
|---|---|
| 1. HUD approves CHA's Plan for Transformation | January, 2000 |
| 2. The Working Group establishes selection criteria | March, 2000 |
| 3. RFQs released for Category 4 and Category 5 properties | March, 2000 |
| 4. RFQ responses due | May, 2000 |
| 5. Development Teams Selected | June, 2000 |
| 6. CHA consults with Gautreaux Court, where appropriate to ensure compliance and seek Revitalizing Orders. | As needed |
| 7. The Working Group plans for redevelopment with selected development teams | July - November, 2000 |
| 8. Property-specific proposals due to CHA | December, 2000 |
| 9. CHA makes funding decisions among proposals for Category 4 and Category 5 properties | April, 2001 |
| 10. Construction starts for initial Category 4 & 5 Properties | Fall 2001 - Spring 2002 |

For a more complete timetable, see Exhibit 6. The timetable is subject to HUD approval of the Plan and the allocation of capital funds.

**Other Redevelopment Issues**

**Gautreaux**

In 1966, Dorothy Gautreaux (Gautreaux) and other tenants and applicants for public housing in CHA brought suit against the CHA and HUD, claiming that the agencies employed racially discriminatory policies in the administration of Chicago's low rent public housing program. The suit charged that public housing tenants were forced to live in segregated areas of the City by virtue of the CHA's tenant assignment and site selection plan.

In 1969, the court ruled for the Gautreaux plaintiffs and entered a Judgment Order, which, with subsequent modifications, creates several restrictions on CHA's ability to redevelop new public housing units. First, CHA was permanently enjoined from constructing public housing in any "Limited Area" (a

neighborhood having more than a 30 percent African American population) unless an equal number of public housing units are constructed in "General Areas."

Secondly, construction of new public housing in neighborhoods is also limited by project size (no more than 240 people at one location) and density (the total number of public housing units in a census tract cannot exceed 15 percent of the total number of apartments and homes). Finally, in 1987, due to the slow pace of CHA's redevelopment activities in the 1970s and 1980s, the Court in 1987 appointed a Receiver, The Habitat Company, to administer CHA's new housing construction. The CHA cannot construct new public housing units without the involvement of The Habitat Company.

The Gautreaux restrictions regarding where units can be built may be waived if the court determines that redevelopment in a Limited Area qualifies as a "Revitalizing Area." Revitalizing Area orders allow the construction of some number of new family public housing units without matching construction in General Areas. The "revitalizing" circumstances must support a reasonable forecast of economic integration, with the longer-term possibility of racial integration. In the determination of Revitalizing Areas, the court takes into account such factors as: the geographic dispersion of units in the neighborhood and on the site; number of units to be built back on site; income mix; amenities; and other investment in the area.

Revitalizing orders have already been issued for Cabrini Green (partial), Henry Horner, ABLA, and North Kenwood Oakland. With the amount of CHA and private funds to be invested in public housing communities, CHA expects the court will find that many CHA communities can be designated Revitalizing Areas. As redevelopment proposals for individual properties move forward, CHA will confer with the Gautreaux Court for treatment of the property.

**Community Involvement**

CHA is committed to involving CHA residents and local communities in the redevelopment process. In the redevelopment process for CHA family properties, the Working Group, comprised of CHA residents, local community partners, the City of Chicago, the Gautreaux plaintiff's/Receiver (where appropriate) and other appropriate parties, will work with developers they help to select in formulating proposals for CHA's consideration. The CHA will provide a minimum of $1.2 million in technical assistance funds for resident groups. Additionally, local foundations have expressed interest in supporting this initiative.

**Lease Compliance**

There will be sufficient time for all families to become lease compliant. CHA will work with families to achieve lease compliance, as defined in the CHA Admissions & Occupancy Policy.

**Resident Services**

Throughout the redevelopment process, CHA will work to ensure the continued availability of services to residents and will include existing service agencies in the redevelopment planning process. All redevelopment plans will include a service component.

**Environmental issues**

When creating and implementing redevelopment plans, CHA will minimize resident exposure to possible contaminants by:

- Removing or permanently encapsulating all components covered with lead-based paint or asbestos.
- Experimenting with native grasses and plants known to reduce the bio-availability of contaminants when landscaping.
- Informing potential rehabilitation contractors of the presence of lead-based paint and requiring all contractors to comply with all local state and federal lead laws.
- Including strict dust control provisions in all demolition contracts.
- Maintaining an Environmental Compliance Officer, charged with monitoring compliance with all applicable local, state, and federal environmental laws.

**Accessibility**

CHA is in the process of procuring services for the 504 Self-Evaluation and Transition Plan, as required by 24 CFR 8.25 (c) g. The Self-Evaluation and Transition Plan will create the blueprint for CHA to comply with Section 504 and Fair Housing laws. Such plans will be incorporated into all redevelopment projects and the capital plan for properties to be rehabilitated. Additionally, CHA will establish a monitoring system to ensure that all rehabilitation and new construction maximizes accessibility for all residents and complies with Section 504 and fair housing requirements.

# Relocation

This section of the Plan addresses relocation issues, including: the number of households to be relocated to Section 8 housing, market absorption, services provided to relocating families, and rights of return. The CHA intends to carry out its relocation activities compassionately, understanding that such moves can be extremely disruptive to affected families. No building will be demolished until each lease-compliant family has been provided suitable relocation services, including adequate notice of the Authority's intention to close the building.

**Section 8 Relocation**

The number of households to be relocated to Section 8 housing is estimated to be less than 6,000, or approximately 1,200 annually over the next five years. (See chart.) Because of the extremely high vacancy rate in the targeted properties, the number of households to be relocated is far less than the number of units to be demolished. Based on the results of the Metropolitan Planning Council's 1999 Regional Rental Market Analysis, the market can absorb this level of relocation activity. Projected entry into the market using Section 8 is at a rate that is less than the growth of the Agency's Section 8 program in recent years. However, in compliance with the HUD letter of November 16, 1999, the number of displaced families using Section 8 in any given year cannot exceed a factor of the number of units available to such families. HUD has agreed to survey vacancy and rent levels to determine the actual vacancy rates amongst landlords and provide such information to CHA on an annual basis. In conducting its study, HUD will also examine actual rates of usage by Section 8 families who lease-up.

| Category | Existing Households | Likely Number to be Relocated to Section 8 | Comment |
|---|---|---|---|
| Existing Redevelopment Commitments | 3,659 | 1,250 | Based on preliminary Housing Choice studies performed over the last two years, CHA assumes that 30% of Henry Horner Homes, ABLA, Cabrini Ext. North and Madden Park Homes/Ida B. Wells residents will choose Section 8 permanently. The remainder are temporary Section 8 vouchers to be used during redevelopment. |
| Senior Buildings | 8,044 | 0 | All internal transfers |
| Scattered Sites | 2,400 | 0 | All internal transfers |
| Non-202 | 2,254 | 0 | All internal transfers |
| Section 202 Mid-rises and Low-rises. | 3,987 | 1,196 | Assumes most of these properties will eventually be retained and, since most transfers will occur on-site, not more than 30% of current residents will need to be relocated to Section 8. |
| Gallery High-rises | 4,146 | 3,316 | Assumes that 80% will need to be relocated to Section 8, assuming natural turnover and a modest number of transfers to other public housing. The availability of inter-development transfer units will be limited by the need for intra-development transfers in redevelopment projects. |

| | | | |
|---|---|---|---|
| Totals | 24,490 | 5,762 | |

**Rights to Return to Public Housing**

Following redevelopment, all families relocating into Section 8 housing with a lease effective date on or after October 1, 1999, will have the right to return to public housing. However, as a practical matter, the Agency cannot assure the return to the same unit, building, or development, although the Agency will make reasonable efforts to accommodate such requests.

**Relocation Services**

- **Modernization projects**. Where a property is to be modernized but not demolished or redeveloped (for example, senior buildings), relocation will occur mostly within the development as a transfer to another public housing unit. Typically, the contractor begins with a portion of the site or building that is vacant, rehabilitates it, and then property managers transfer the first group of families into completed units. The contractor then moves to the units just vacated and starts the process anew. In such circumstances, the Agency will arrange for the physical move and will pay for the necessary utility reconnection charges.

- **Redevelopment projects**. For buildings that are to be demolished or redeveloped, residents who need to be relocated will be given the option to transfer to other public housing or obtain a Section 8 voucher. Families will receive extensive pre-move counseling and assistance in accessing services. Families relocating with Section 8 will also receive mobility counseling so they can make informed choices and secure adequate housing. The Agency will also provide post-move counseling. The Agency will arrange for the physical move, will pay for necessary utility reconnections, and will also offer assistance with security deposits.

**Relocation Plans**

Over the past several years, the Agency has closed a number of low-occupancy and physically obsolete buildings and transferred families, primarily, to other CHA properties, referred to as "building consolidations." The Agency will not conduct any further building consolidation unless such actions are necessary to protect the health and safety of CHA residents or in the event of an emergency. Relocation plans will be prepared in tandem with the larger redevelopment plans for these properties. The goal of the Agency is to provide each affected resident, barring emergencies, with at least 120 days notice of the need to relocate. The Agency is reviewing procedures for relocation, produced by numerous stakeholders during meetings held over the past year. The CHA will finalize and implement these procedures in early 2000.

**Lease Compliance**

CHA is committed to assisting families in becoming lease-compliant within a reasonable amount of time. The CHA will institute a pre-screening policy for families moving to Section 8. With advanced notice of moves, residents who are not lease-compliant will be given a reasonable period of time to achieve lease compliance. Criteria used to determine lease compliance are specified in the lease and occupancy section of this document. The particulars used to verify compliance issues

are outlined in the CHA screening procedures, an attachment to the agency-wide Admissions and Occupancy Policy. The CHA will assess lease compliance, giving full consideration to mitigating factors and evidence of rehabilitation or sustained improvement.

**Relocation Contract**

CHA is committed to adopting a lease amendment affirming residents rights under the relocation process. The Agency is currently negotiating such an addendum with the RAB/CAC.

# Property Management

Approximately 50 percent of the Agency's public housing stock is currently managed by private firms, 40 percent by Agency staff, and 10 percent by Resident Management Corporations (RMCs). Regardless of the management model, and against industry practice, the Agency centrally maintains control of major building services – non-routine maintenance, security, evictions, maintenance supplies, and more. This has resulted in both high costs and poor accountability.

The Agency plans to place all remaining senior properties under third-party managers on or around February 2000, and all family properties by July 2000. At the same time, the Agency will dramatically restructure its relationship with its private managers and RMCs. It will shift authority and responsibility for the day-to-day management to the private managers and RMCs. It will also dramatically increase the operating funds provided to private managers largely by reducing overhead and other centralized costs. For improved oversight, it will also strengthen its current system of contract monitoring and quality assurance in order to hold managers accountable for better performance. Property managers and RMCs will have the resources and the authority to do their jobs well, and the CHA will be in a position to ensure performance, as described below.

**Authority and Responsibility**

In hiring private managers and RMCs in the past, the Agency retained many of the day-to-day management and maintenance responsibilities, from rent collections to work order intake. The Agency will now transfer to private managers and RMCs the functions that are typically performed by fee-managers in the conventional market (See Exhibit 2). This change is not only necessary to reduce costs and establish clearer lines of authority/responsibility, but is also essential in the Agency's efforts to recruit professional firms and promote RMCs.

**Accountability**

For better oversight, the Agency will strengthen its contract monitoring systems. The contract administration unit will be expanded from current staffing of 10 to 33. The Agency will develop a resident training, internship and employment program to provide opportunities to those residents seeking careers in property and asset management. The increased staffing will enable CHA to expand its quality assurance efforts. Each asset manager will be assigned responsibility for approximately 3,000 units. The Agency's management information system is being upgraded so that key performance data on each property – rent collections, work order response times, occupancy, etc. – will be available on-line to each asset manager.

**New Management Contract**

The change in responsibilities necessitates an entirely new management contract between the Agency the private third party managers. The Agency has drafted a proposed management contract, with the input of the CAC/LAC leadership, and has included quality assurances provisions to hold all private managers and RMCs to the same standards of accountability and to require all property managers and RMCs to enter into a uniform contract. This new contract is one of the reasons why the Agency will re-bid all of its properties, not just those that are currently managed in-house.

**Resources**

At the heart of the Agency's transformation plan is the development of a new project-based budgeting system and substantially increased funding for the property budgets. With the transfer of the responsibility for maintaining the properties to professional management companies and RMCs, the Agency will also assign the resources to get the job done. Beginning with the new management contracts, the Agency will assign non-utility budgets, on average, of $300 per unit monthly (PUM) to each property, including $40 PUM for capital maintenance. This figure is substantially more than current funding. Exhibit 3 shows the proposed allocation of operating budgets by property types.

**Annual Management Plans**

Each year, the private managers and RMCs will be required to prepare an Annual Management Plan for each property. This Plan will include specific goals and objectives for the property. In developing these annual management plans, the private managers and RMCs will be required to meet with, and obtain input from, residents. The management plan will require private managers and RMCs to submit a document outlining their annual plan for routine maintenance, preventive maintenance, capital plan, vacancy reduction, security, rent collection budget allocations, and grievance procedures. Once approved, these plans will form the basis for monitoring each firm's performance.

**Resident Management Corporations (RMCs)**

The CHA strongly supports resident management of the CHA-owned properties and will negotiate new contracts with RMCs on the same terms as private managers (budgets, rules, and performance standards). For RMCs in formation or in training, the RFPs for private managers shall clearly state all existing obligations between CHA and potential RMCs and the successful respondents shall assume CHA obligations as appropriate.

**Environmental issues**

The CHA will require that all private managers and RMCs comply with all local, state and federal environmental laws. The CHA will also maintain a lead-poisoning prevention and response team. The Agency will seek outside resources to continue and expand environmental and health prevention activities.

**Architectural and Engineering Service**

The Agency will soon procure multi-year Architectural & Engineering (A&E) services that are assigned to specific building types (elderly, scattered site, etc.). This will improve familiarization and continuity in the delivery of professional services, thereby expediting the completion of major capital improvements and rehabilitation.

**Accessibility**

The CHA will provide Section 504 and Fair Housing training to Agency staff by June 2000. Additionally, CHA will require that all key private management and RMC staff attend Section 504 and Fair Housing training.

**Exhibit 2**
**Summary of Major Changes in Private Management & RMC Contracts**

| | | | |
|---|---|---|---|
| Rent Collections | Rents are currently sent to a centralized "lock box" and entries are maintained by the CHA. The CHA also sends out rent statements and late notices. These functions will be transferred to the managers, who will collect rent on site, enter data into the Agency's integrated computer system, and generate all respective notices. | Utility Management | The private managers and RMCs are not currently involved in either the payment of utility bills or the monitoring of utility consumption. Water and sewer bills will now be sent directly to the manager for payment. Because of well-head arrangements and existing energy performance contracts, the Agency will continue to arrange for payment for gas and electric bills, but will explore ways to decentralize these arrangements as well. |
| Applicant Screening | With the adoption of site-based waiting lists, the screening of applicants will be handled on-site. | Evictions | The private managers and RMCs will now be responsible for handling of evictions and securing appropriate legal representation. |
| Security Services | The procurement and administration of security guard contracts, currently centralized, will be transferred to the private managers and RMCs. | Financial Reporting | Current financial reporting requirements will become standardized and streamlined, with most to be submitted electronically. |
| Force Account | Work currently performed by Agency "force account" crews, mostly in the area of vacancy preparation and environmental remediation, will be transferred to the private managers and RMCs. | Heating Plant Maintenance | The responsibility for heating plant maintenance will be incorporated into the new private management and RMC contracts. |
| Security Deposits | The administration of the security deposit accounts will be transferred to the private managers and RMCs. | Emergency Maintenance | Responsibility for all emergency maintenance work will be transferred to the private managers and RMCs. |
| Non-routine Maintenance | Centralized Agency crews currently perform most non-routine maintenance work. Each property will be assigned $40 PUM for non-routine maintenance, which will permit the private managers and RMCs to hire qualified contractors or supplement existing staff. | Work Order Intake | The Agency operates a central "work order control center" that receives all work order requests from residents. This function will be disbanded and residents will call their respective management office to place a work order. |

| | | | |
|---|---|---|---|
| Payment of Operating Subsidy | Under the current structure, the management company incurs operating costs and then requests monthly reimbursements from the Agency. Consistent with practices in the conventional market, the Agency will establish a monthly payment schedule for operating subsidy to the property. These operating subsidies will be paid at the beginning of each month, eliminating the need for this monthly reconciliation of actual expenses. | Payment of Management Fee | Also consistent with standards in the conventional market, the private firms and RMCs will invoice the project for payment of their management fee rather than wait for Agency reimbursement. The Agency will then post-audit fee payments. |
| M/WBE and Section 3 | Implementing the CHA MBE/WBE and Section 3 requirements will be transferred to the private managers. | Emergency Services | Private managers and RMCs will be responsible for emergency service linkages, including board-up services and emergency relocation assistance. An emergency and evacuation plan will be prepared as a part of the management plan. |

**Exhibit 3**
**Assignment of Non-utility Operating Budgets, by Property Type**

With the new management contracts (to be fully implemented by July, 2000), the Agency will assign an average of $300 per unit monthly (PUM) in non-utility funds to each property, excluding "deprogrammed" units. A deprogrammed unit is a vacant unit in a building that is targeted for demolition and where the Agency will not prepare the unit for re-occupancy. Deprogrammed units will receive approximately $192 PUM in non-utility funds, consistent with the lower funding received from HUD for such units.

The budgets assigned to each property will be exclusive of Agency overhead, meaning that these amounts represent what is actually available to operate the properties. Other than the pro-rata share of the Agency's insurance costs (about $5-$10 PUM), there will be no Agency charge-backs since each property will procure all of its own services and supplies.

While the overall average will be $300 PUM (except deprogrammed units), the amounts assigned to different building types will vary. For FY 2000, these allocations will be on the order of the following:

| Type | Approximate Units | Non-utility PUM |
|---|---|---|
| Senior | 9,480 | $270 |
| Family Low-rise | 5,500 | $300 |
| Family Mid-rise | 5,500 | $320 |
| Family High-rise | 12,000 | $300 |
| Deprogrammed Units | 6,000 | $192 |

The exact amount to be assigned to each property is currently being finalized. The above figures include $40 PUM for capital (extraordinary) maintenance. The amount to be assigned to Family High-rises reflects the fact that many of these buildings are slated for demolition and that, as units are vacated, they will not be prepared for re-occupancy.

Finally, the above amounts do not include $5 million (annually) for security. Approximately $3 million of this amount will be used to provide at least 10-hours of contract security service daily at each senior building. The remaining funds will be allocated, based on need, to family properties.

# Lease and Occupancy

In accordance with the renewed emphasis on property management, the following changes in lease and occupancy policies are in various stages of development. Many changes are found in the CHA's revised A&O, included as an attachment to the Annual Plan.

**Lease enforcement**

The CHA plans administrative changes to support strong and consistent lease enforcement efforts by professional property managers and RMCs.

**Applicant screening**

Improved lease enforcement must be coupled with tougher screening procedures to insure that public housing communities are safe and desirable places to live. The CHA will require the professional property managers and RMCs to conduct screening to determine if applicants will make suitable residents. The CHA will not place applicants on the waiting list who do not meet recently established eligibility criteria dealing with the illegal use of drugs and other criminal activity. In accordance with the A & O Policy, all applicants will be subject to uniform screening procedures administered at the site level, often assisted by resident advisory groups, established jointly by CHA and the CAC/LAC. The procedures will assess the applicant's ability to:

- pay rent and other charges on time in accordance with the lease.
- care for and avoid damaging the unit and common areas.
- use facilities and equipment in a reasonable way, create no health or safety hazards and to report maintenance needs.
- respect the right to peaceful enjoyment of others and to avoid damaging the property of others.
- refrain from <u>any</u> activity, including drug-related or other criminal activity, that threatens the health, safety or right to peaceful enjoyment of other residents or staff.
- comply with necessary and reasonable property rules and health and safety codes.

The above criteria are the essential elements of lease compliance covering the range of resident obligations from rent payment to housekeeping. These criteria will also be applied by the CHA to define lease compliant residents in good standing.

**Fair administration of the screening criteria**

Under the screening procedures, the determination to admit an applicant or make an assessment of good standing for lease compliance will include the following considerations:

- Verifiable evidence of rehabilitation with respect to drug use, drug-related, or other criminal activity.
- Other verifiable evidence of mitigating circumstances presented by an applicant or resident.
- The specific circumstances of the case including seriousness of the offense and extent of participation by family members.
- Resident knowledge that a household member was/is using drugs or engaged in criminal activity.
- Options that permit the CHA and the resident to deal with the family member(s) who are engaged in the unacceptable activity without terminating the lease for the household.

Residents may contest a good standing determination through the Grievance Procedures, and applicants denied admission are entitled to an informal hearing to present evidence of mitigating circumstances.

**Expanding the definition of family**

Many CHA families live in non-traditional households. In order to keep these families together and to foster the caring relationships that both children and adults need, CHA has broadened its definition of family and, for the first time, acknowledges kinship care arrangements. Under kinship care arrangements the primary caregiver in the household need not be a relative or have legal custody or guardianship for children or others living as part of that family.

**Local preferences for new admissions**

In accordance with QHWRA, the A&O Policy provides a preference for a mix of incomes. Fifty percent of all new admissions will be for households with annual incomes of not more than 30 percent of area median and 50 percent will be for families between 31 percent and 80 percent of the area median. The CHA is permitted to skip families on the waiting list to assure that a mix of income is achieved. The income mixing preference and skipping flexibility applies only to new admissions. The policy also includes preferences for upwardly mobile families, defined to include families with an adult member who is working or starting job training, and a preference for victims of domestic violence.

**Site-based waiting lists**

The CHA will take advantage of the changes to waiting list rules in Section 525 of the QHWRA. Subject to review and approval by applicable courts, and in compliance with applicable Fair Housing and 504 disability requirements, CHA will expand site-based waiting lists to all sites and revise the procedures for administering such lists so that all intake activity, including housing offers, can be made at the site. Applicants can place their names on waiting lists for three separate properties. CHA will insure that each applicant has complete information on housing options available in the selection of developments. Further, CHA will monitor the activities of the professional property managers to enforce compliance with applicable Fair Housing and Disability laws. (A Fair Housing Monitoring Plan is included as an attachment to the Annual Plan.)

**Lease and Grievance procedures**

CHA, in consultation with the RAB/CAC, will undertake revisions to the lease and grievance procedures. The lease will be revised to bring the language in line with the A & O policy as well as QHWRA. QHWRA includes new provisions that address public housing residents who fail to comply with Temporary Assistance for Needy Families (TANF) and community service requirements. At the request of the residents and the RAB/CAC, CHA will also revise the grievance procedures to make it more responsive. Both the lease and grievance revisions will be available for separate public comment.

**Accessibility**

The A & O Policy protects the rights of persons with disabilities in the following ways:

- Creates a local preference for admission to accessible housing units for current residents and applicants who need accessible units.
- Offers of housing for all accessible units or adaptable units will first be made to current residents having a disability and who require the accessible features of the vacant unit. In effect, a transfer of the resident with disabilities from a non-adapted unit to the vacant accessible/adapted unit. If there is no current resident in need of the unit, the unit will be offered to an eligible applicant having a disability that requires the accessibility features of the vacant unit.
- If there is no such applicant and the CHA offers the unit to an applicant without a disability, CHA will require the applicant to agree to move to an available non-accessible unit within 30 days when either a current resident or an applicant needs the features the unit provides. This requirement will be reflected in the lease agreement signed with the applicant.
- When there is a mismatch between a unit's accessible features and the accessible features needed by the applicant, or if an accessible unit is offered to a family not requiring the features of that unit, the refusal of the unit will be considered a good cause for refusal, and the applicant will not lose their place on the waiting list(s).
- Includes a timetable for accessibility repairs. CHA will make units accessible per the timetable.

**Rent Structure**

In accordance with QHWRA, residents will pay the lower of an income-based rent or a unit-based rent. An income-based rent has been the standard in public and assisted housing for many years. Ceiling rents are unit-based rents and have been used for some time by public housing agencies to cap rents and thereby retain working families. Ceiling rents are typically related to operating costs. QHWRA expands the unit based rent options by adding a new category of rent called a “flat rent”. The flat rent is tied to market factors. For a detailed description of rent structure, see the discussion in the Annual Plan.

# Human Capital Development

Far from its original purpose as transitional housing for the working poor, public housing developments in Chicago has become permanent communities of extreme poverty. While CHA's primary focus is the rehabilitation, redevelopment, and management of housing that is safe and affordable, the CHA must also consider the human capital needs of its residents.

In the past, the CHA often undertook the responsibility for direct service delivery. Although the intent was to ensure the availability of services, the result was frequently a duplication of services that further isolated and segregated residents. The Agency also did a poor job of monitoring the quality of these programs, which became fragmented and ineffective.

The Plan outlines a new approach, one where CHA reduces its direct role in service delivery but instead concentrates it resources to facilitate residents' access to services in the community. The main strategy of this new model is the establishment of development-based community workers -- "service connectors" -- who will assist residents in identifying and accessing services that already exist or are provided in close collaboration with other public and private agencies. Additional efforts in the area of human capital development include: support for active resident participation and leadership, tenant patrols, senior programs, treatment services, and aggressive fundraising.

**Service Connectors**

The CHA will commit approximately $7.1 million annually to establish service connectors at each property.

Service Connectors may be community residents who are sensitive to and experienced with public housing needs and other human service issues: environmental health risks, substance abuse, special needs for the elderly and/or disabled, public safety, etc. They will be drawn from the community, and receive training as paraprofessionals in the areas of assessment and referral, resource identification, interagency coordination, and systems advocacy and navigation.

The Office of Programs will work to assure that existing programs are available to residents, including: the University of CHA (a summer school and after-school program that improves academic outcomes for at-risk youth through tutoring and team building), early childhood interventions (provided in the home or at quality childcare centers), after-school activities (midnight basketball and tutoring), the summer food program, and career development activities (role model workshops and internships).

**Collaborative Fundraising**

Currently, the Agency receives about $9 million annually in outside funding for various resident services programs. The goal is to increase this amount to $50 million in five years. Towards that end, a dedicated unit has been created within CHA's Finance Department to develop collaborative fundraising strategies with

partners in service delivery. Areas of particular focus include: training and employment services, economic development, education (youth, adult, and senior), preventative health services for all ages, security (improvements to building security systems, funding for tenant patrols or other community policing initiatives, etc.), and other support services.

**Senior Programs**

Working with the City's Department on Aging, the CHA will help to provide an array of services for the more than 9,000 senior citizens living in CHA housing, including resource and referral services, Victims Assistance, health screening, education, concerts and other enrichment activities. Service connectors will also be established for senior buildings.

**Tenant Patrols**

Families and seniors in public housing face gang violence and high crime rates that threaten their daily activities. The CHA Tenant Patrol is a group of concerned residents coming together to help create a stable and secure environment for families. The Agency will continue to fund this initiative at about $2 million annually; however, the responsibility for coordinating the tenant patrols will be transferred to the private managers. The Tenant Patrols will work in collaboration with the comprehensive community policing and security strategies developed for each housing development.

**Resident Leadership**

The Central Advisory Council (CAC) and the Senior Housing Advisory Council (SHAC) are the duly organized and constituted organizations representing the tenant interests for all of CHA's housing developments. These councils act on behalf of the residents in matters concerning their welfare. The CAC and SHAC provide invaluable input to CHA planning, policies and procedures. The Agency will continue to fund activities under the CAC/LACs at approximately $1.4 million annually.

**Treatment Services**

Although the emphasis will be in assisting residents to access services in the community, the Agency will make available $2.0 million for each of the next two years under the Drug Elimination Grant for drug treatment services. These funds will be used to purchase services in existing drug treatment facilities to accommodate the needs of residents. While this represents a small percentage of the overall need, these funds will help the Agency to address critical and urgent needs. It is anticipated that fundraising efforts will assure at least an equivalent level of service in out years.

# Protective Services

The Plan introduces a major change in the philosophy of policing and also shifts the responsibility for security services to the property level.

- **Security guard services**. The Agency will fund security guard service at approximately $5 million annually. This will provide at least 10-hours of coverage daily at each senior building. It will also provide resources for security guard service at various family buildings slated for demolition. The procurement and oversight of this guard service, however, will be transferred to the third party managers, as opposed to centralized Agency staff. These funds are in addition to the base budgets ($300 PUM average) to each property.

- **Law enforcement**. The Agency recently transferred CHA policing functions to the Chicago Police Department. This change recognizes that all city residents, including CHA residents, deserve the same high quality of police protection. The City will provide these services with the help of a U.S. Department of Justice Community Oriented Police (C.O.P.S.) grant that allows the hiring of 375 new police officers. Coupled with the amount the Agency will pay the City over the life of grant, the Public Housing Section of the Chicago Police Department will be increased to provide a staff of over 500 sworn personnel dedicated solely to public housing.

  A combination of vertical patrols, foot patrols and Chicago's Alternative Policing Strategy (C.A.P.S.) will be used to reclaim, revitalize, and maintain the community. During the reclamation phase, problems will be identified, plans will be developed and intensive law enforcement efforts will be employed. Revitalization will be achieved through zero tolerance enforcement, organization of the community through partnerships, and greater efforts to provide services to the community. Once stability has been achieved, the maintenance phase can begin. Enforcement can be scaled back to customary police coverage levels and partnerships and joint strategies with the community will be maintained to sustain a safe, healthy, and productive living environment.

  Through the use of one Police Department, a team concept can be realized through a unified police presence and visibility, an increased number of officers for the buildings, coordinated community policing efforts, the assistance of district patrols, and the support of City services. As properties are redeveloped, as victimization levels are reduced. As gallery-style high rises are demolished, the need for specialized policing services will also be greatly reduced.

  Overall Agency resources for policing services are estimated to be $63 million over the next five years. This is less than half of what the Agency has been spending in recent years and yet the actual number of officers assigned to CHA properties will significantly increase.

- **Site-based security plans**. In conjunction with the preparation of the annual budget and management Plan for the property, each private manager and RMC will provide a security Plan for the property, addressing items ranging from physical improvement to tenant patrols. This Plan will be developed in consultation with residents.

- **Monitoring and Oversight**. CHA, in consultation with the RAB/CAC and the Chicago Police Department, will establish a monitoring system to ensure the provision of police and security services at each development (CAPS model).

# Section 8 Rental Assistance

The CHA administers approximately 27,000 vouchers under the Section 8 program. The Section 8 Program provides housing subsidies to owners of private dwellings who lease units (houses or apartments) to eligible households. The Program was created by Congress in 1974 and has become the single largest federal housing assistance program for low-income families. With Section 8, the Agency is able to offer a range of housing options (i.e., project-based and tenant-based assistance).

Under the Section 8 Program, eligible tenants pay about 30% of their adjusted income for rent and utilities. The Housing Authority pays to the property owner a Housing Assistance Payment (HAP) equal to the difference between the tenant payment and the fair market rent for the unit, which is established according to program rules.

After years of agency mismanagement, the Section 8 program was transferred to private management in 1996 and, since that time, administration of the program has improved tremendously. Except for units reserved for court-ordered efforts, the program is fully leased.

The main activities and initiatives proposed under the Section 8 rental assistance program in the years ahead include:

**Merger of vouchers and certificates**

QHWRA merges and consolidates the Section 8 certificate and voucher programs into one housing choice voucher program. This merger should make the program simpler and more attractive to both voucher holders and landlords. The merger will require a rewrite of the Section 8 Administrative Plan, the primary policy document for the Section 8 program. Significant changes will include:

- Admissions targeting (at least 75 percent of all admissions must be families with incomes below 30 percent of median income).
- The establishment of local preferences, which could include, but not be limited to, working families and persons with disabilities.
- A new model lease, including owner obligations with respect to lease enforcement.
- Extension of the period a family may hold the voucher while searching for a unit beyond the current 120 day limit (this change will assist families relocating out of public housing units).

The revised Administrative Plan for the Section 8 program will be subject to a separate comment period.

**Screening policy**

The merger rule permits eligibility and suitability screening of Section 8 applicants by the CHA. The CHA will conduct a screening for lease compliance prior to referral to the Section 8 program. (CHAC, CHA's Section 8 contractor, will continue to screen for criminal activity and other issues.) However, the owner of the property still has a final responsibility for screening any family intending to lease a unit.

**Contract Monitoring**

Similar to the changes to be implemented in the property management area, the Agency will enhance its contract monitoring by implementing the following activities:

**Reporting Requirements**

The CHA will revise and expand program reporting from CHAC, the Agency's Section 8 contractor. In particular, the Agency will closely monitor relocation and inspection activity. Reports will track the success rate of relocated families versus the families from the general waiting list and general market absorption trends. The Agency will also track the number of days to perform key Section 8 processing functions, such as the period between request for lease approval and inspection or the period between execution of contract and first landlord payment.

**Quality Assurance**

The CHA will establish a formal protocol for conducting its own quality assurance audits. CHA will review, on its own or by contract, the documents essential to Section 8 program operations. Quality assurance will focus on the following areas: rent calculations, required verifications, rejection of families for the program, maintenance of the waiting lists, adequacy of the briefing, sampling of unit inspections (including re-inspections to make sure the units meet Housing Quality Standards (HQS)), adequacy of rent reasonableness determinations, timely payment of the housing assistance payments (HAP), effectiveness of CHAC's mobility counseling program for second moves, whether landlords are meeting their responsibilities under the program, and other areas as specified in the contract with the vendor.

The CHA will improve its monitoring of compliance with Section 504 and fair housing laws. The CHA also intends to establish a testing protocol to identify and address fair housing compliance in the market place. The CHA may contract with a third party to perform this service.

**Performance standards and incentives**

The CHA will soon be entering into negotiations to extend the current contract to operate the Agency's Section 8 program. The new contract will include new performance standards and incentives.

**Mobility Counseling**

As of November 1999, 37.2 percent of all Section 8 households with children live in low-poverty areas (defined as a census tract where not more than 23.9 percent of the households are poor). In 1998, HUD authorized the conversion of 250 vouchers to provide $2.5 million in funding (to be used over two years) for special mobility counseling services to encourage moves to low-poverty areas. The Agency will request an extension of this program when this initial allocation of funds

expires. The Agency has found that "second move" mobility counseling can be particularly effective. These services will be provided directly through CHAC or through third-party contractors.

**Use of administrative fees to continue and expand service connection efforts**

The Agency is paid a fixed administrative fee to administer each Section 8 unit. The fee savings that the Agency obtains through its private management contract will be used to expand service connection efforts for Section 8 recipients.

**Landlord outreach**

To expand the number of landlords participating in the program and improve the image of the program and the receptiveness of neighbors, CHA will:

- Work with organizations representing residents, landlords and neighbors, community institutions such as churches and service organizations, elected officials and others to communicate more clearly and effectively about the housing choice voucher program, including the rights and responsibilities of tenants and landlords, the terms of the housing assistance contract, and the process by which leasing is accomplished.
- Promote incentives for landlords across the region to participate in the program, including potential tax abatements and other measures.
- Screen potential recipients of Section 8 vouchers for criminal history and lease compliance, prior to beginning their apartment search. While landlords will still have the ultimate responsibility for tenant screening, CHA will provide this baseline service as part of its commitment that residents referred to the Section 8 program will be ready for the private market.
- Work with organizations representing landlords and property managers to continue to address issues with program functions and processing times.

**Exception rents and changes to the payment standard**

The Agency has received approval of "exception" rents for 15 high-rent sub-markets in the City of Chicago. The Agency will continue to examine areas where exception rents are required for effective program operation. The CHA will use the information provided in HUD's annual market study, along with other data, to assess the need for exception rents within a community area.

**Inspections**

The focus will be on maintaining a strong Housing Quality Standards Inspection Program but also expediting inspection turnaround times.

**Lead poisoning prevention**

The CHA will create financial assistance to assist Section 8 landlords in creating lead-safe housing. The CHA will create a strategy to ensure that Section 8 housing is comparable in environmental safety to CHA owned property, especially in units where pre-school age children reside.

**Accessibility**

The CHA will make a special effort to identify accessible units for the Section 8 program in the City of Chicago and will provide a database of referrals for families who require units with these features.

In order to increase accessibility options under the Section 8 Program to persons with disabilities, CHA will:

- Continue to aggressively apply for additional funding to increase the number of Section 8 certificates for persons with disabilities.
- Recruit landlords with accessible units.
- Establish an "Access Improvement Fund" of $300,000 annually that will be used to make modest investments (around $1,000 per unit) to aid with accessibility.
- Request exception rents, where appropriate, to cover the cost of accessibility improvements made by landlords.

**Services and Section 8**

| **Section 8 Family** | **Potential Assistance** |
|---|---|
| Relocatee from public housing | · Pre-move counseling including housekeeping and budgeting.<br>· Moving and relocating assistance including security deposit payments, utility connection fees, and payment of moving cost.<br>· Mobility counseling including assistance in finding a unit, neighborhood choice options, and visits to possible opportunity areas.<br>· Connection counselors to keep in contact with the family and make referrals in areas such as child-care, education, and job training. |
| Waiting List Families that receive a Voucher | · Connection counselors to keep in contact with the family and make referrals in areas such as child-care, education, and job training.<br>· Mobility counseling including assistance in finding a unit, neighborhood choice options, and visits to possible opportunity areas (subject to funding availability). |

| | |
|---|---|
| Section 8 Families Making 2nd Moves | · Mobility counseling including assistance in finding a unit, neighborhood choice options, and visits to possible opportunity areas.<br><br>· Connection counselors to keep in contact with the family and make referrals in areas such as child-care, education, and job training. |

# Section 3 and MBE/WBE Goals

The Plan provides a major opportunity to support small and disadvantaged businesses and to promote employment opportunities (in construction, management, and services) for residents and other low income individuals. CHA is committed to providing that opportunity through carefully targeted Section 3 and Minority-Owned Business Enterprise/Women Owned Business Enterprise (MBE/WBE) programs.

**Section 3 and Apprenticeship**

Section 3 of the Housing Act of 1968 requires that 30 percent of new hires to be public housing residents or other low income persons from the community or the City. Under Section 3, contractors must look first to the residents of the development for hiring. To foster this goal, CHA will work with a special task force of the CAC and the Mayor's Office of Workforce Development to craft a hiring and referral program. The program will balance the desire for residents from each development to work on the construction projects in their own development with the need for apprentices to gain sufficient experience to achieve their union cards. CHA is also exploring the potential for collaborating with private and other public agencies to provide specialized education and training for residents willing and ready to work. CHA will also seek to refer residents to contractors and projects funded by other public agencies and private organizations. In support of this goal, CHA has proposed a goal that $20 million of its construction contracting wages under the Capital Program be the wages of CHA residents in union apprenticeship programs.

**Minority Business Enterprise and Women Business Enterprise**

The Agency's goals for MBE/WBE participation are as follows:

For construction contracts:

- 25% of the contract amount for contracts under $200,000
- 30% for contracts between $200-500,000
- 35% for contracts between $500,000 and $1 million
- 40% for contracts over $1 million

For materials, supplies and services:

- 20% of the contract amount (regardless of contract size).

In addition to the above, the Agency will encourage mentorship relationships with smaller MBE/WBE firms that can contribute bona fide commercial value to the overall project, including in particular resident owned businesses. CHA will work with organizations serving the minority business community to develop a strategy for promoting such relationships, and for communicating the benefits to potential mentor firms as well as to qualified MBE/WBEs throughout the City.

# Consolidated Budget

The CHA's total budget for its Section 8 and public housing programs is approximately $637 million annually.[4]

Exhibits 4 and 5 show the sources and uses of funds over the next five years for the Section 8 and public housing programs, respectively. For illustration purposes, the amounts shown (revenues and expenses) are not adjusted for inflation or for changes in unit counts. They assume the same level of funding as projected to be received in FY 2000. Although the number of future public housing units will decrease and the number of future Section 8 units will increase, the pace at which this will occur will not be fully known until completion of the redevelopment planning processes. While these events will affect the composition of Agency funding (i.e., public housing funds will be reduced as Section 8 funding is increased), the purpose of these two exhibits is to convey the Agency's broader approach to spending.

**Exhibit 4 – Section 8**

The total budget for Section 8 is approximately $212 million annually. Of this amount, $191.3 million represents Housing Assistance Payments to landlords; $19.5 million represents fees earned to administer the program; $0.4 million represents interest income from reserves, and $0.7 million represents funds provided to the Agency for special mobility counseling services. Although mobility counseling funds expire in FY 2000, the Agency has requested that this program be extended. Of the $19.9 million in combined administrative fees and interest income, approximately $17.0 million is paid to CHAC to administer the Section 8 program. The balance, which represents the savings generated as a result of private management, will be used for three purposes: (1) Agency monitoring of the Section 8 contract ($900,000); a new "access improvement" fund to assist landlords make small capital improvements for persons with disabilities ($300,000); and (3) service connectors for Section 8 residents ($1.7 million in FY 2000 and $2.5 million thereafter).

**Exhibit 5 – Public Housing**

The total budget for public housing, inclusive of operating, capital, and Drug Elimination Grants, is approximately $426 million annually. Expenses are grouped according to the major themes of this Plan:

- **Administrative Overhead**

  Total overhead costs (i.e., indirect costs) are projected at $33.5 million in FY 2000 and approximately $22.0 million in FY 2001-2004, after transitioning to total third-party management. Some centralized functions are transferred entirely to the private managers and RMCs (rent collections, evictions, work order intake, administration of security guard contracts, etc.), others are completely eliminated (central warehouse), and still others are significantly reduced (for example, with fewer overall employees, the Agency needs fewer Personnel staff). Unfortunately, comparisons of overhead costs from previous years cannot be provided since these costs were not separately tracked.

[4] These figures also include approximately $8.3 million in FY2000 for the "City-State" program, representing 900 units of agency-owned project-based Section 8.

- **Property Management**

  Funding for property management is projected at approximately $149 million annually. This includes both the operating budgets assigned to each site as well as oversight and monitoring. The figures in FY 2000 include Agency management for some properties through June 2000. The amounts presume a minimum of $300 PUM in non-utility costs for all properties under private management and RMCs, exclusive of deprogrammed units, which will receive approximately $192 PUM. These amounts include $40 PUM (approximately $18.0 million) for extraordinary maintenance.

- **Utilities**

  Costs are projected at $55 million annually.

- **Resident Services**

  The budget includes a base commitment from Agency funds for four core programs: CAC/SHAC, Service Connectors, Family Investment Center, and Tenant Patrols, amounting to $11.5 million annually. In addition, the Agency will fund $2.0 million in each of the first two years for drug treatment services, with the expectation that fundraising efforts will be successful in maintaining these services in out years. Presently, the Agency receives $8.8 million annually in outside grants to support resident programs. Through targeted outreach and fundraising, the Agency expects to increase outside grants to $50 million annually by FY 2004.

- **Safety and Security**

  Police services are projected at $15.0 million in FY 2000 and $12.0 million in FY 2001-2004. The budget also includes $5.0 million annually for security guard service, which includes at least 10 hours of coverage daily at all senior buildings. Funding for the United States Department of Justice grant for Community Policing is not shown here because it will be administered directly by the City.

- **Capital**

  The Agency is projecting to receive $148 million annually under the public housing Capital Fund. Of this amount, $18 million will be used for capital maintenance (shown under Property Management), $8.6 million for Architectural and Engineering Services, $5.2 million annually for Project Management (both redevelopment and construction management staff)[5], and $11.1 million in contingency. The balance, or $109.1 million in FY 2000 and $105.1 million in FY 2001-2004, will be used for building improvements. No funds are budgeted for non-capital uses.

This Plan represents the first time that the Agency has presented a unified, five-year budget.

[5] The amount for FY 2000 is only $1.2 million since construction management salaries were already budgeted from the FY 99 grant.

**Exhibit 4**

## Section 8 Programs
**FY2000-FY2004**

| Section 8 | 2000 | 2001 | 2002 | 2003 | 2004 | Totals |
|---|---|---|---|---|---|---|
| **Revenues:** | | | | | | |
| Administrative Fees | $19.5 | $19.5 | $19.5 | $19.5 | $19.5 | $97.5 |
| HAP Payments | 191.3 | 191.3 | 191.3 | 191.3 | 191.3 | 956.5 |
| Mobility Counseling Fund | 0.7 | 0.0 | 0.0 | 0.0 | 0.0 | 0.7 |
| Interest Income | 0.4 | 0.4 | 0.4 | 0.4 | 0.4 | 2.0 |
| Total | $211.9 | $211.2 | $211.2 | $211.2 | $211.2 | $1,056.7 |
| **Expenses:** | | | | | | |
| CHAC | $ 17.0 | $ 17.0 | $ 17.0 | $ 17.0 | $ 17.0 | $ 85.0 |
| Monitoring | 0.9 | 0.9 | 0.9 | 0.9 | 0.9 | 4.5 |
| Service Connectors | 1.7 | 1.7 | 1.7 | 1.7 | 1.7 | 8.5 |
| Mobility Counseling | 0.7 | 0.0 | 0.0 | 0.0 | 0.0 | 0.7 |
| Access Improvement Fund | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 | 1.5 |
| HAP Payments | 191.3 | 191.3 | 191.3 | 191.3 | 191.3 | 956.5 |
| Total | $ 211.9 | $ 211.2 | $ 211.2 | $ 211.2 | $ 211.2 | $ 1,056.7 |
| **Surplus/Deficit** | $0.0 | $0.0 | $0.0 | $0.0 | $0.0 | 0.00 |

**Exhibit 5**

**Chicago Housing Authority**
**Public Housing Programs**
**FY2000-FY2004**

| | 2000 | 2001 | 2002 | 2003 | 2004 | Totals |
|---|---|---|---|---|---|---|
| **Revenue** | | | | | | |
| Rents | $39.5 | $39.5 | $39.5 | $39.5 | $39.5 | $197.5 |
| Miscellaneous Income | 1.1 | 1.1 | 1.1 | 1.1 | 1.1 | 5.5 |
| Operating Subsidy | 183.4 | 183.4 | 183.4 | 183.4 | 183.4 | 917.0 |
| Drug Elimination Grant | 10.5 | 8.3 | 8.3 | 8.3 | 8.3 | 43.7 |
| City/State Revenue | 8.3 | 6.7 | 6.7 | 6.7 | 6.7 | 35.1 |
| Capital Grant | 146.2 | 148.0 | 148.0 | 148.0 | 148.0 | 738.2 |
| Reserve | 17.0 | 0.0 | 0.0 | 0.0 | 0.0 | 17.0 |
| Overhead Budgeted from CGP 99 | 10.7 | 0.0 | 0.0 | 0.0 | 0.0 | 10.7 |
| Other Grants | 8.8 | 20.0 | 30.0 | 40.0 | 50.0 | 148.8 |
| Total Revenue | $425.5 | $407.0 | $417.0 | $427.0 | $437.0 | $2,113.5 |
| **Administrative/Overhead** | | | | | | |
| Executive Office | $8.6 | $8.6 | $8.6 | $8.6 | $8.6 | $43.0 |
| Finance & Administration | 9.7 | 5.0 | 5.0 | 5.0 | 5.0 | 29.7 |
| General Expense | 9.1 | 5.0 | 5.0 | 5.0 | 5.0 | 29.1 |
| Terminal Leave | 0.5 | 0.0 | 0.0 | 0.0 | 0.0 | 0.5 |
| Employee Benefits | 5.6 | 3.0 | 3.1 | 3.2 | 3.3 | 18.2 |
| Subtotal | $33.5 | $21.6 | $21.7 | $21.8 | $21.9 | $120.4 |
| **Property Management:** | | | | | | |
| Routine | $122.1 | $126.1 | $128.7 | $128.6 | $128.5 | $634.0 |
| Extraordinary Maint. (Capital Fund) | 18.0 | 18.0 | 18.0 | 18.0 | 18.0 | $90.0 |
| Terminal Leave | 3.8 | 0.0 | 0.0 | 0.0 | 0.0 | 3.8 |
| Employee Benefits | 9.5 | 2.3 | 2.3 | 2.3 | 2.3 | 18.7 |
| Subtotal | $153.4 | $146.4 | $149.0 | $148.9 | $148.8 | $746.5 |
| **Utilities** | $55.0 | $55.0 | $55.0 | $55.0 | $55.0 | $275.00 |
| **Resident Services:** | | | | | | |
| CAC/SHAC | $1.4 | $1.4 | $1.4 | $1.4 | $1.4 | $7.0 |
| Service Connectors | 7.1 | 7.1 | 7.1 | 7.1 | 7.1 | 35.5 |
| Family Investment Center | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 5.0 |
| Tenant Patrols | 2.0 | 2.0 | 2.0 | 2.0 | 2.0 | 10.0 |
| Drug Treatment | 2.0 | 2.0 | 0.0 | 0.0 | 0.0 | 4.0 |
| Admin/Other | 6.6 | 1.5 | 0.8 | 0.8 | 0.8 | 10.5 |
| Other Grants | 8.1 | 20.0 | 30.0 | 40.0 | 50.0 | 148.1 |
| Terminal Leave | 0.3 | 0.0 | 0.0 | 0.0 | 0.0 | 0.3 |

| | 2000 | 2001 | 2002 | 2003 | 2004 | Totals |
|---|---|---|---|---|---|---|
| **Safety & Security** | | | | | | |
| Police | $15.0 | $12.0 | $12.0 | $12.0 | $12.0 | $63.0 |
| Security | 5.0 | 5.0 | 5.0 | 5.0 | 5.0 | 25.0 |
| Terminal Leave | 0.7 | 0.0 | 0.0 | 0.0 | 0.0 | 0.7 |
| Employee Benefits | 0.1 | 0.0 | 0.0 | 0.0 | 0.0 | 0.1 |
| Subtotal | $20.8 | $17.0 | $17.0 | $17.0 | $17.0 | $88.8 |
| **Capital:** | | | | | | |
| A & E | $8.6 | $8.6 | $8.6 | $8.6 | $8.6 | 43.0 |
| Project Management | 1.2 | 5.2 | 5.2 | 5.2 | 5.2 | 22.0 |
| Building Improvements | 109.1 | 105.1 | 105.1 | 105.1 | 105.1 | 529.5 |
| Contingency | 11.1 | 11.1 | 11.1 | 11.1 | 11.1 | 55.5 |
| Total | $130.0 | $130.0 | $130.0 | $130.0 | $130.0 | $650.0 |
| Total Expenses | $425.5 | $407.0 | $417.0 | $427.0 | $437.0 | $2,113.5 |
| Surplus/Deficit | $0.0 | $0.0 | $0.0 | $0.0 | $0.0 | $0.0 |

| | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Employee Benefits** | 4.4 | 2.0 | 2.0 | 2.0 | 2.0 | 12.4 | | | | | | | | |
| **Subtotal** | $32.9 | $37.0 | $44.3 | $54.3 | $64.3 | $232.8 | | | | | | | | |

# Timeframes and Performance Standards

Exhibit 6 includes timeframes for each of the major initiatives presented in this Plan. Most of the management changes will occur in the first six months of this Plan.

In its list of waivers and requests to HUD, the CHA has asked that its Public Housing Assessment System (PHAS) score for five years will be waived. In lieu of PHAS, the Agency will prepare annual plans and year-end reports which will include performance standards. Although PHAS will be waived, the Agency will continue to have its units undergo the independent physical inspection and independent resident survey. The results of these inspections and surveys will be advisory only.

In order to allow the public to track CHA's progress under this Plan, CHA will publish a quarterly progress report. The report will outline CHA's achievements on key initiatives and performance measurements agreed upon by HUD and CHA.

**6. TIMEFRAMES FOR MAJOR INITIATIVES**

| | | DESCRIPTION | START | END |
|---|---|---|---|---|
| **Capital Plan** | Demolition | The agency will apply for demolition of all high rise buildings that are currently vacant in early 2000. Assuming expeditious HUD review and approval, these buildings will be demolished in the latter part of 2000. All other demolitions will be dictated by approved redevelopment plans. | 2/1/00 | 12/2/00 |
| | Renovation of Senior Properties | The first renovations will begin in the third quarter of 2000 and will continue through the third quarter of 2002. | 7/1/00 | 9/30/02 |
| | Renovation of Scattered Site Properties | The first renovations will begin in the third quarter of 2000 and will continue through the third quarter of 2002. | 7/2/00 | 9/30/02 |
| | Development of Redevelopment Selection Criteria | The Working Group to establish criteria by February, 2000. | | 3/1/00 |
| | Renovation/Redevelopment of Non-202 Family Properties | CHA will issue request for qualifications from development teams in March 2000, with awards by May 2001. Renovation/redevelopment will take three years (through 2004) | 3/1/00 | 12/31/04 |
| | 504 Self Evaluation and Transition Plan | CHA will procure services for the 504 self evaluation and transition plan and complete the process by July 2000. | 2/1/00 | 7/1/00 |
| | Renovation/Redevelopment of Section 202 Properties | The Agency will issue request for qualifications from development teams in March 2000, with awards by May 2001. For those proposals selected for award, redevelopment will take four years (through 2005). | 3/1/00 | 12/31/05 |
| **Property Management** | Private Management | All properties to be placed under private management on or about June 1, 2000. | 12/1/99 | 6/1/00 |
| | Development and Assignment of Property-based Budgets | New budgets to be assigned as properties are transferred or re-bid to private managers (on or about June 1, 2000). | 1/1/00 | 6/1/00 |
| | 504 Training | The Agency will provide 504 and Fair Housing training to Agency staff. | 2/2/00 | 6/1/00 |
| | Implementation of New Management Contract with Private Managers | To be implemented with new contract awards (on or about June 1, 2000). | 2/1/00 | 6/1/00 |
| | Development of New Contract Monitoring System for Property Management | To be implemented with new private management contracts (no later than June 1, 2000). | 2/1/00 | 6/1/00 |
| **Lease and Occupancy** | Admissions and Occupancy Policy | A new A& O policy has been completed will be implemented the first quarter of 2000. | 1/1/00 | 3/1/00 |
| **Human Capital Development** | Service Connectors | The Agency will start establishing “service connectors” offices in the first quarter of 2000 and have the remainder completed by third quarter 2000. | 1/1/00 | 9/30/00 |
| **Protective Services** | Transfer of Police Functions | Completed | | |
| **Section 8** | Section 8 Administrative Plan | A new Administrative Plan for Section 8 will be completed in the first quarter of 2000. | 12/1/99 | 3/31/00 |

# Commitments, Waivers, and Requests

Chicago Housing Authority

January 6, 2000

**CHICAGO HOUSING AUTHORITY**
**VARIOUS OTHER GRANT PROGRAMS**
**FY2000**

| | |
|---|---|
| **COMMUNITY DEVELOPMENT BLOCK GRANTS** | |
| CDBG | $38,220 |
| Altgeld Youth Development Initiatives | 40,000 |
| CHA Ambassador | 8,000 |
| **TOTAL CDBG** | **86,220** |
| | |
| **OTHER FEDERAL GRANTS** | |
| **Department of Housing & Urban Development** | |
| Elderly Services Coordinator Program | 600,000 |
| **US Department of Agriculture through Illinois State Board of Education** | |
| Summerfood | 3,733,199 |
| **TOTAL OTHER FEDERAL GRANTS** | **4,333,199** |
| | |
| **NON- FEDERAL SOURCES** | |
| **Department of Health** | |
| Child Health Intervention Grant | 70,000 |
| CHIP | 47,000 |
| **Office of Attorney General** | |
| Victim Assistance Grant | 24,205 |
| Sr. Victim Witness Program | 23,550 |
| **Illinois Department of Human Services** | |
| Teen Parent Initiative | 29,000 |
| TeenReach | 13,680 |
| **Chicago Department of Human Services** | |
| Child Care, CDHS | 1,753,060 |
| Head Start CDHS | 971,461 |
| Collaboration, CDHS | 109,000 |
| Head Start/Child Care CDHS | 177,693 |
| Community TransNet | 200,000 |
| **Other Grants** | |
| RTA Job Access | 200,000 |
| MET Quantum | 86,176 |
| **TOTAL NON-FEDERAL GRANTS** | **3,704,825** |
| | |
| Employee Benefits | 736,137 |
| | |
| **GRAND TOTAL** | **$8,860,381** |

## DEMOLITION / DISPOSITION ACTIVITY DESCRIPTION

| Project No. | Development Name | Building Address | Units | Activity Type<br>**demo**=Demolition<br>**dispo**=Disposition | Application Status<br>***(Select One:)***<br>**Appr.**=Approved by HUD<br>**Sub.**=Submitted/Pending HUD Approval<br>**Plan**=Planned Application | Submission Date | Approval Date | Coverage<br>**PT**=Part of the development<br>**TL**=Total development<br>**ND** = Non-Dwelling | Timeline<br>Actual/Projected Date<br>Start | Finish | Status |
|---|---|---|---|---|---|---|---|---|---|---|---|
| IL2-18 | Wells Extension | 514 E. 36th Street | 65 | demo | Appr | 06/19/98 | | PT | 11/99 | 3/00 | In progress |
| | | 510 E. 36th Place | 65 | | | | | | | | |
| | | 534 E. 37th Street | 65 | | | | | | | | |
| | | 551 E. 36th Place | 65 | | | | | | | | |
| IL2-36 | Darrow Homes | 706 E. 39th | 120 | demo/dispo | Appr/Plan | 07/26/95 | | PT | 2000 | | Pending bid process |
| IL2-19 | Horner Homes | 111 N Wood/120 N Heritage | 234 | demo/dispo | Appr/Plan | 09/09/96 | | PT | Proj. 2000 | | Pending resolution of consent decree litigation |
| | | 141 N Wolcott/1847W Lake | 231 | | | | | | | | |
| IL2-35 | Horner Extension | 2245 W Lake | 143 | demo/dispo | Appr/Plan | 07/26/95 | | PT | 2000 | | Pending procurement issues. |
| | | 2215 W Lake | 138 | | | | | | | | |
| IL2-27 | Lawndale Complex | 2641 W 12th PL | 97 | demo/dispo | Plan | | | PT | 2000 | | Interim Plan and demo application submission approved by CHA Brd. Planned submission to HUD 12/99 |
| | | 1319 S Washtenaw | 18 | | | | | | | | |
| | | 1331 S Washtenaw | 18 | | | | | | | | |
| | | 1325 S Washtenaw | 18 | | | | | | | | |
| | | 2635 W 12th PL | 18 | | | | | | | | |
| | | 2647 W 12th PL | 18 | | | | | | | | |
| IL2-21 | Rockwell | 2501 W Monroe | 140 | demo/dispo | Appr/Plan | 08/18/98 | | PT` | 2000 | | Start date pending resolution of contract negotiations. Pending CHA Plan Approval |
| | | 117 S Rockwell | 140 | | | | | | | | |
| | | 2517 W. Adams | 138 | | Plan | | | | To be determined | | |
| | | *2417 W. Adams | 140 | | | | | | To be determined | | |
| IL2-22 | Stateway | *3615-17 S. Federal St. | 230 | demo/dispo | Plan | | | PT` | To be determined | | Pending CHA Plan Approval |
| IL2-20 | Cabrini Extension | 500-502 W Oak | 259 | demo/dispo | Sub | 01/12/99 | | PT` | To be determined | | On hold pending resolution of Habitat Litigation. |
| | | 1150/60 W Sedgewick | 262 | | Appr/Plan | 05/18/95 | | | | | |
| | | 1158 N Cleveland | 67 | | | 08/08/98 | | | | | |
| IL2-16 | Ickes Homes | *2233 S Federal | 65 | demo/dispo | Plan | | | PT | 2000 | | Pending |
| IL2-37 | Robert Taylor | *5266 S. State | 158 | demo/dispo | Plan | | | PT | To be determined | | Pending CHA Plan Approval |
| | | *5100 S. State | 158 | | | | | | | | |
| | | 4848 S. State | 158 | | | | | | | | |
| | | 4844 S. State | 158 | | | | | | | | |
| | | 4500 S. State | 158 | | | | | | | | |
| | | *4352 S. State | 158 | | | | | | | | |
| | | *4331 S. Federal | 158 | | | | | | | | |
| | | 4845 S Federal | 158 | | | | | | | | |
| IL2-34L | Washington Park | 3910-12 S Indiana | 12 | demo/dispo | Plan | | | PT | Proj. 2000 | | Pending CHA Plan Approval |
| | | 3914-16 S Indiana | 12 | | | | | | | | |
| | | 6127-41 S Calumet | 8 | | | | | | | | |
| | | 6145-59 S Calumet | 8 | | | | | | | | |
| | | 4520-22 S Champlain | 12 | | | | | | | | |
| | | 4524-26 S Champlain | 12 | | | | | | | | |
| | | 4528-30 S Champlain | 12 | | | | | | | | |
| | | *123-25 E 39th | 12 | | | | | | | | |
| | | 4445 S Evans | 158 | | | | | | | | |
| IL2-33 | Madden Park | 3837 S. Ellis | 109 | demo/dispo | Plan | | | PT | To be determined | | Pending HOPE VI Application |
| | | 3855 S. Ellis | 109 | | | | | | | | |

## DEMOLITION / DISPOSITION ACTIVITY DESCRIPTION

| Project No. | Development Name | Building Address | Units | Activity Type<br>**demo**=Demolition<br>**dispo**=Disposition | Application Status<br>***(Select One:)***<br>**Appr.**=Approved by HUD<br>**Sub.**=Submitted/Pending HUD Approval<br>**Plan**=Planned Application | Submission Date | Approval Date | Coverage<br>**PT**=Part of the development<br>**TL**=Total development<br>**ND** = Non-Dwelling | Timeline<br>Actual/Projected Date<br>Start | Finish | Status |
|---|---|---|---|---|---|---|---|---|---|---|---|
| IL2-03 | Brooks Homes | 1215-31 S. Throop | 9 | demo/dispo | Plan | | | PT | proj. 2000 | | Roosevelt Rd. Expansion (B) |
| | | 1290A-99B W. Washburne | 9 | | | | | | | | Pending CHA Plan Approval |
| | | 1280-88 W.Washburne | 9 | | | | | | | | |
| | | 1262-78 W. Washburne | 9 | | | | | | | | |
| | | 1244-60 W. Washburne | 9 | | | | | | | | |
| | | 1226-42 W. Washburne | 9 | | | | | | | | |
| | | 1208-24 W. Washburne | 9 | | | | | | | | |
| | | 1384A-90B W. Washburne Ave. | 8 | dispo | | | | | 2000 | | Roosevelt Rd. Expansion (A) |
| | | 1366-82 W. Washburne Ave. | 9 | | | | | | | | Demolition previously approved, |
| | | 1334-48 W. Washburne Ave. | 8 | | | | | | | | pending bid process. |
| | | 1316-32 W. Washburne Ave. | 9 | | | | | | | | |
| | | 1214-30 S. Throop St. | 9 | | | | | | | | |
| | | 1350-64 W. Washburne Ave. | 8 | demo/dispo | Appr/Plan | | | PT | 2000 | | |
| | | 1300-14 W. Washburne Ave. | 8 | | | | | | | | |
| | | 1201-19 W. 13th Street | 10 | | Appr/Plan | 08/28/98 | | PT | 2000 | | Fosco Park Expansion |
| | | 1300-18 S. Racine | 10 | | | | | | | | Preparing Bid documents. |
| | | 1320-38 S. Racine | 10 | | | | | | | | |
| | | 1200-18 W. Hastings | 10 | | | | | | | | |
| | | 1231-49 W. Hastings | 10 | | | | | | | | |
| | | 1226-38 W. 14th Street | 7 | | | | | | | | |
| | | 1215-29 W. Hastings | 8 | | | | | | | | |
| | | 1200 W. 14th Street | 0 | | Plan | | | ND | 2000 | | |
| IL2-31 | Brooks Ext. | 1209 S. Racine | 150 | dispo | Appr/Plan | 11/25/96 | | TL | Proj. 2000 | | Start date pending completion of |
| | | 1111 W. Roosevelt | 150 | | Appr/Plan | | | | | | Brooks phase II (for relocation) |
| | | 1239 S. Racine | 150 | | Plan | 11/25/96 | | | 1/98 | 5/98 | Building demolished. |
| IL2-46A | Hilliard | 2031 S. Clark | 173 | dispo | Plan | | | TL | Proj. 2000 | | Pending development agreement. |
| | | 2030 S. State | 173 | | Plan | | | | To be determined | | |
| | | 30 W. Cermack | 182 | | Plan | | | | | | |
| | | 2111 S. Clark | 182 | | Plan | | | | | | |
| | | 54 W. Cermack (Mgmt. Bldg.) | 0 | | | | | ND | Pending | | |
| | | | | | | | | | | | |
| | | **Total** | **5,255** | | | | | | | | |

**Buildings undergoing final relocation activities.*

## Viability and Conversion to Vouchers — Section 202 of the Omnibus Consolidation Rescissions and Appropriations Act of 1996

Section 202 of the Omnibus Consolidation Rescissions and Appropriations Act of 1996 mandated a viability (or conversion to vouchers) test for certain public housing properties. HUD regulations require that public housing authorities determine the feasibility of keeping certain distressed public housing properties by comparing the cost to fix and maintain the property over twenty years to the cost of providing a voucher for all families in occupancy.

If it is determined that the cost of fixing and maintaining the property is greater than the cost of awarding Section 8 assistance, a conversion plan must be prepared and submitted to HUD. The conversion plan describes how families in occupancy will be relocated and includes provisions for resident and local comment and a schedule for demolition of the buildings.

HUD guidelines describing how the test works were initially issued in September 1996 and revised as a final rule in September 1997. In 1998 Congress passed the Quality Housing and Work Responsibility Act (QHWRA). The 1998 Act repeals Section 202 however, developments already identified by the CHA for assessment continue to be subject to the Section 202 rules published in September 1997.

The 1998 law expands upon the conversion test requirements. If the CHA fails the physical inspection criteria of HUD's Public Housing Assessment System or continues to manage distressed properties as defined by the 1998 law, then a conversion test for these properties must be prepared. This is now an annual requirement.

Properties included in this Plan are identified based on the September 1997 rules. To be subject to the viability test, a property must be on the same or contiguous sites, have a vacancy rate of at least 10 percent (for units not in funded on-schedule modernization), and total more than 300 dwelling units.

The viability test works by converting the costs to revitalize and operate the property as public housing to a monthly number. The cost components to revitalize and operate the property include: operating costs for the property (actual or allocated); the cost to modernize the entire property; and the cost to replace equipment or components that wear out (boilers, roofs, pumps etc.) over the 20 year life of the revitalized property. The monthly revitalization cost is then compared to a monthly Section 8 cost.

The Section 8 costs include: an average Fair Market Rent (FMR) based on the bedroom sizes of the occupied units (unit-weighted); the monthly administrative fees for the Section 8 program; and amortized demolition and relocation costs (the total cost of these items spread over 20 years and converted to a monthly amount).

Included on the next page is a summary of the 1999 viability test results. CHA originally ran the viability test in 1998, however HUD disputed the formula assumptions used. CHA re-ran the test in 1999 strictly adhering to the HUD requirements in the September 1997 rules.

# DESIGNATION OF PUBLIC HOUSING ACTIVITY DESCRIPTION

| Development Name | Development (Project) Number | Designation Type | | Application Status | Date | Designation Constitute | No. of Units Affected | Coverage of Action |
|---|---|---|---|---|---|---|---|---|
| | | Current | Proposed | *(Select One:)* | | *(Select One:)* | | *(Select One:)* |
| | | E=Occupancy by only the Elderly<br>F=Occupancy by | | A=Approved; included in the PHA's Designation Plan<br>S=Submitted, pending approval<br>P=Planned application | | N=New Designation Plan<br>R=Revision of a previously-approved Designation Plan? | | P=Part of the development<br>T=Total development |
| Armour Square | IL2-44A | E | E | A | 12/01/95 | | 98 | T |
| Armour Square | IL2-44B | E | E | A | 12/01/95 | | 100 | T |
| Armour Square Annex | IL2-33 | E | E | A | 12/01/95 | | 95 | T |
| Armour Square Annex | IL2-33A | E | E | A | 12/01/95 | | 99 | T |
| Clark & Irving | IL2-58 | E | E | A | 12/01/95 | | 162 | T |
| Clark & Irving Annex | IL2-66 | E | E | A | 12/01/95 | | 96 | T |
| Clark & Irving Annex | IL2-66A | E | E | A | 12/01/95 | | 97 | T |
| Eckhart Park Annex | IL2-67 | E | E | A | 12/01/95 | | 218 | T |
| Eckhart Park Apts. | IL2-42B | E | E | A | 12/01/95 | | 181 | T |
| Flannery Apts. | IL2-42F | E | E | A | 12/01/95 | | 125 | T |
| Flannery Apts. | IL2-42G | E | E | A | 12/01/95 | | 127 | T |
| Hilliard Elderly | IL2-46 | E | E | A | 12/01/95 | | 182 | T |
| Hilliard Elderly | IL2-46 | E | E | A | 12/01/95 | | 182 | T |
| Lake Michigan Apts. | IL2-41 | E | E | A | 12/01/95 | | 124 | T |
| Midwest Terrace | IL2-43E | E | E | A | 12/01/95 | | 129 | T |
| Parkside Apts. | IL2-79 | E | E | A | 12/01/95 | | 169 | T |
| Racine Apts. | IL2-83 | E | E | A | 12/01/95 | | 212 | T |
| Wicker Park Annex | IL2-68 | E | E | A | 12/01/95 | | 120 | T |
| Wicker Park Apt. | IL2-42E | E | E | A | 12/01/95 | | 116 | T |
| Yale Apartments | IL2-60 | E | E | A | 12/01/95 | | 224 | T |
| 69th & South Chicago | IL2-49 | EF | E | S | 01/01/00 | | 125 | T |
| 91st South Chicago | IL2-80 | EF | E | S | 01/01/00 | | 149 | T |
| 91st South Chicago | IL2-80 | EF | E | S | 01/01/00 | | 149 | T |
| Albany Terrace Apts. | IL2-78 | EF | E | S | 01/01/00 | | 350 | T |
| Bridgeport | IL2-42 | EF | E | S | 01/01/00 | | 14 | T |
| Britton/Budd Apts. | IL2-48 | EF | E | S | 01/01/00 | | 173 | T |
| Clark & Webster Apts. | IL2-51 | EF | E | S | 01/01/00 | | 100 | T |
| Dickens & Burling Apts. | IL2-50 | EF | E | S | 01/01/00 | | 138 | T |
| Fisher Apts. | IL2-44 | EF | E | S | 01/01/00 | | 200 | T |
| Flannery Homes | IL2-42F | EF | E | S | 01/01/00 | | 125 | T |
| Flannery Homes | IL2-42F | EF | E | S | 01/01/00 | | 127 | T |
| Franklin & Drake Apts. | IL2-45A | EF | E | S | 01/01/00 | | 157 | T |
| Garfield Park Apts. | IL2-44 | EF | E | S | 01/01/00 | | 151 | T |
| Hattie Callner Apts. | IL2-45B | EF | E | S | 01/01/00 | | 151 | T |
| Judge Green Apts. | IL2-55 | EF | E | S | 01/01/00 | | 153 | T |
| Judge Slater | IL2-47 | EF | E | S | 01/01/00 | | 204 | T |
| Judge Slater | IL2-70 | EF | E | S | 01/01/00 | | 203 | T |
| Kenmore Apts. | IL2-10 | EF | E | S | 01/01/00 | | 136 | T |

# DESIGNATION OF PUBLIC HOUSING ACTIVITY DESCRIPTION

| Development Name | Development (Project) Number | Designation Type | | Application Status | Date | Designation Constitute | No. of Units Affected | Coverage of Action |
|---|---|---|---|---|---|---|---|---|
| | | Current | Proposed | *(Select One:)* | | *(Select One:)* | | *(Select One:)* |
| | | E=Occupancy by only the Elderly<br>F=Occupancy by | | A=Approved; included in the PHA's Designation Plan<br>S=Submitted, pending approval<br>P=Planned application | | N=New Designation Plan<br>R=Revision of a previously-approved Designation Plan? | | P=Part of the development<br>T=Total development |
| Kenneth Campbell Apt. | IL2-52 | EF | E | S | 01/01/00 | | 165 | T |
| Langley Apartments | IL2-57 | EF | E | S | 01/01/00 | | 174 | T |
| Larrabee Apts. | IL2-71 | EF | E | S | 01/01/00 | | 85 | T |
| LaSalle/Division Apts. | IL2-82 | EF | E | S | 01/01/00 | | 269 | T |
| Lathrop Elderly | IL2-RH4 | EF | E | S | 01/01/00 | | 92 | T |
| Leland/Sheridan | IL2-56 | EF | E | S | 01/01/00 | | 235 | T |
| Lincoln Perry Annex | IL2-102 | EF | E | S | 01/01/00 | | 183 | T |
| Lincoln Perry Apts. | IL2-63 | EF | E | S | 01/01/00 | | 267 | T |
| Loyola & Ridge | IL2-110 | EF | E | S | 01/01/00 | | 181 | T |
| Major Robert Lawrence Apts. | IL2-53 | EF | E | S | 01/01/00 | | 193 | T |
| Parkview Apts. | IL2-42A | EF | E | S | 01/01/00 | | 180 | T |
| Patrick Sullivan Apts. | IL2-44B | EF | E | S | 01/01/00 | | 482 | T |
| Pomeray Apts. | IL2-39 | EF | E | S | 01/01/00 | | 120 | T |
| Princeton Apts. | IL2-32 | EF | E | S | 01/01/00 | | 339 | T |
| Schneider Apts. | IL2-81 | EF | E | S | 01/01/00 | | 179 | T |
| Sheffield Annex | IL2-72 | EF | E | S | 01/01/00 | | 206 | T |
| Sheffield Apts. | IL2-61 | EF | E | S | 01/01/00 | | 188 | T |
| Sheridan & Devon Apts. | IL2-73 | EF | E | S | 01/01/00 | | 450 | T |
| Shields Apartments | IL2-42 | EF | E | S | 01/01/00 | | 116 | T |
| Washington Park | IL2-34 | EF | E | S | 01/01/00 | | 92 | T |
| Washington Park | IL2-59 | EF | E | S | 01/01/00 | | 22 | T |
| William Castelman Apts. | IL2-40 | EF | E | S | 01/01/00 | | 200 | T |
| William Jones Apts. | IL2-42 | EF | E | S | 01/01/00 | | 116 | T |

# Viability Comparison

| | Units | 1998 Viability Subj = Y or N | 1999 Viability Subj = Y or N | Comments |
|---|---|---|---|---|
| ***Category I*** | | | | |
| Henry Horner | 1,688 | N = On schedule Modernization; Court Decree; Hope VI | N = On schedule Modernization; Court Decree; Hope VI | HUD letter not subject to Test. |
| Cabrini North | 926 | N = Excluded Hope VI | N = Excluded Hope VI | HUD letter not subject to Test. |
| ABLA | 3,235 | | | |
| Brooks Homes | - | N = On schedule Modernization | N = On schedule Modernization; + Hope VI; (2% Vacancy rate) | |
| Brooks Extension | - | N = Excluded Hope VI | N = Excluded Hope VI | |
| Jane Addams Homes | - | N = Total demolition proposed | N = Total demolition proposed; + Hope VI | |
| Grace Abbot Homes | - | N = On schedule Modernization | N = Hope VI | |
| Wells/Madden/Darrow/Wells Ext | 2,891 | | | |
| | - | Y = Wells Ext. - Passed ($284) | N = 8% Adjusted vacancy rate | |
| | - | Y = Wells Homes - No test submitted | Y = Failed ($294.48) | HUD letter requests Test for Wells. |
| Madden (in above count 2,891) | (459) | N = Not applicable at time | Y = Failed ($211.57) | |
| Robert Taylor B Hope VI | - | N = Total demolition proposed | N = Total demolition proposed | |
| Hilliard | | | | |
| Hilliard Center | 346 | N = Not applicable at time | Y = Failed ($116.94) | |
| Hilliard Senior | 364 | N = Not applicable at time | Y = Failed ($99.44) | |
| Washington Park | 56 | N = Excluded, not contiguous | N = Excluded, not contiguous | |
| Lakefront | - | N = Not applicable | N = Not applicable | |
| ***Category II*** | | | | |
| Senior | 9,480 | N = Properties do not meet 300 unit threshold | N = Properties do not meet 300 unit threshold | |
| ***Category III*** | | | | |
| Scattered Sites | 2,918 | N = Not contiguous, no site w/300 or more units | N = Not contiguous, no site w/300 or more units | |
| ***Category IV*** | | | | |
| Cabrini Extension Lincoln | 18 | N = < 300 units | N = < 300 units | |
| Lake Parc Place | 300 | N = Not applicable at time | N = 4% Adjusted vacancy rate | |
| LeClaire Courts | 300 | N = Not applicable at time | N = 5% Adjusted vacancy rate | |
| Washington Park Low-rises | 488 | N = Not contiguous | N = Not contiguous | |
| Lawndale Complex | 187 | N = < 300 units | N = < 300 units | |
| Lawndale Gardens | 128 | N = < 300 units | N = < 300 units | |
| Lathrop | 925 | N = Vacancy rate <10% | N = 6% Adjusted vacancy rate | |
| Bridgeport Homes | 155 | N = < 300 units | N = < 300 units | |
| Wentworth | 422 | N = Vacancy rate <10% | N = 5% Adjusted vacancy rate | |
| Lowden Homes | 128 | N = < 300 units | N = < 300 units | |
| ***Category V Mid-rises and Low-rises*** | | | | |
| Cabrini Rowhouse | 586 | N = On schedule Modernization; excluded | Y = Failed ($176.35) | |
| Trumbull | 486 | Not applicable at time; vacancy rate <10% | Y = Failed ($230.96) | |
| Ickes | 1,006 | Not applicable at time | Y = Failed ($215.67) | |
| Dearborn | 800 | Y = Passed ($114) | Y = Failed ($327.31) | |
| Altgeld Murray | 1,998 | Not applicable at time | Y = Failed ($566.67) | |
| ***Gallery High-rises*** | | | | |
| 1230 N. Burling (Green Homes) | 134 | N = < 300 units; on schedule Modernization; excluded | N = < 300 units; on schedule Modernization; excludedbut is part of Green Homes (see below) | |
| Cabrini Ext. South | 597 | Y = Passed ($75) | N = 6% Adjusted vacancy rate, test N/A | |
| Green Homes | 968 | Y = Passed ($32); excludes 1230 N. Burling | Y = Failed ($333.88); excludes 1230 N. Burling | If Tested with 1230 N. Burling fails by $303.74. |
| Rockwell Gardens | 1,136 | Y = Passed ($92) | Y = Failed ($250.90) | |
| Stateway Gardens | 1,644 | Y = Passed ($39) | Y = Failed ($290.14) | |
| Robert Taylor A | 1,734 | N = Excluded total demolition proposed | N = Excluded total demolition proposed | If tested fails by $295.19. |
| Robert Taylor B | 2,050 | N = Excluded total demolition proposed | N = Excluded total demolition proposed; partial Hope VI | If tested fails by $391.81. |
| Washington Park | 468 | N = Excluded; site not contiguous | N = Site not contiguous | As above (Washington Park). If tested fails by $303.05. |
| Randolph Towers | 155 | N = < 300 units | N = < 300 units | Gallary High Rises included in Washington Park |

ABLA
Hud letter gives more time to develop the plan.
If Tested fails by:
Brooks Ext.- $580.25; Addams- $733.78; Abbott- $228.96

HUD letter asks for plan to remove units from inventory. If tested, failed by $391.81.

*HUD accepts non-contiguous argument with additional documentation. If Tested, IL2-34 (1,157 units) fails by $303.05.

9% Adjusted vacancy rate(11/99), would not be subject to Test; but a Gallery High Rise.

# CONVERSION OF PUBLIC HOUSING ACTIVITY DESCRIPTION

| Development Name | Development (Project) Number | Status of Required Assessment | | | | Status of Required Assessment | Status of Conversion Plan | | | | Description of Section 202 | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | U=Assessment Underway S=Assessment results submitted to HUD A=Assessment results | | | | | *(Select the statement that best describes the current status:)* D=Conversion Plan in development S=Conversion Plan | | | | *(Select One:)* DA=Units addressed in a pending or approved demolition application (date submitted or approved:) | | | | | |
| | | U | S | A | O | | D | S | A | AP | DA | 5DA | RP | VR | SN | O |
| **Category I** | | | | | | | | | | | | | | | | |
| Henry Horner | | | | | X | Hope VI | | | | | | | X | | | |
| Cabrini North | | | | | X | Hope VI | | | | | | | X | | | |
| ABLA | | | X | | X | Hope VI | | | | | | | X | | | |
| Wells/Madden/Darrow/Wells Extension | | X | | | | Hope VI to be submitted | | | | | | | X | | | |
| Robert Taylor B HOPE VI | | | | | X | Hope VI | | | | | | | X | | | |
| Hilliard | | X | | | | Development pending-in negotiations | | | | | | | | | | X |
| Washington Park | ot subject to cost test--- | | | | | | | | | | | | | | | |
| Lakefront | ot subject to cost test--- | | | | | | | | | | | | | X | | |
| **Category II** | | | | | | | | | | | | | | | | |
| Senior Developments | ot subject to cost test--- | | | | | | | | | | | | | | | |
| **Category III** | | | | | | | | | | | | | | | | |
| Scattered Sites | ---Not subject to cost test--- | | | | | | | | | | | | | | | |
| **Category IV** | | | | | | | | | | | | | | | | |
| ***Non-202 Family Properties*** | | | | | | | | | | | | | | | | |
| Cabrini Extension Lincoln | ---Not subject to cost test--- | | | | | | | | | | | | | | | |
| Lake Parc Place | ---Not subject to cost test--- | | | | | | | | | | | | | | | |
| LeClaire Courts | ---Not subject to cost test--- | | | | | | | | | | | | | X | | |
| Washington Park Lowrises | ---Not subject to cost test--- | | | | | | | | | | | | | | | |
| Lawndale Complex | ---Not subject to cost test--- | | | | | | | | | | | | | | | |
| Lawndale Gardens | ---Not subject to cost test--- | | | | | | | | | | | | | | | |
| Lathrop | ---Not subject to cost test--- | | | | | | | | | | | | | X | | |
| Bridgeport Homes | ---Not subject to cost test--- | | | | | | | | | | | | | | | |
| Wentworth | ---Not subject to cost test--- | | | | | | | | | | | | | X | | |
| Lowden Homes | ---Not subject to cost test--- | | | | | | | | | | | | | | | |
| **Category 5 - 202 Family Properties** | | | | | | | | | | | | | | | | |
| ***Mid-rises and Low-rises*** | | | | | | | | | | | | | | | | |
| *Cabrini Rowhouses | | X | | | | | X | | | | | | | | | X |
| *Trumbull | | X | | | | | X | | | | | | | | | X |
| *Ickes | | X | | | | | X | | | | | | | | | X |
| *Dearborn | | | X | | | | X | | | | | | | | | X |
| *Altgeld Murray | | X | | | | | X | | | | | | | | | X |
| ***Gallery High-rises*** | | | | | | | | | | | | | | | | |
| 1230 N. Burling (Green Homes) | ---Not subject to cost test--- | | | | | | | | | | | | | | | |
| *Cabrini Extension South | ---Not subject to cost test--- | | | | | | | | | | | | | X | | X |
| Green Homes | | | X | | | | | | | | | | | | | |
| Rockwell Gardens | | | X | | | | | | | | | | | | | |
| Stateway Gardens | | | X | | | | | | | | | | | | | |
| Robert Taylor A | ---Total demolition proposed--- | | | | | | | | | | | | | | | |
| Robert Taylor B HOPE VI | | | X | | | | | | | | | | | | | |
| **Washington Park HRs | ---Not subject to cost test--- | | | | | | | | | | | | | | | |
| Randolph Towers | ---Not subject to cost test--- | | | | | | | | | | | | | | | X |

*Market driven process proposed for these sites.

**Properties are not contiguous but will be treated based on structure type. Demolition proposed for all three Gallery High-rise buildings

**Electronic Note:**

Due to the size of the Budget documents, they will be transmitted electronically under separate cover within 24 hours from the date of this electronic submission.

# Chicago Housing Authority: Plan for Transformation

Improving Public Housing in Chicago
And the Quality of Life

January 6, 2000

# Executive Summary

The Chicago Housing Authority (CHA) owns 38,000 units of public housing, which includes some of the worst housing in America. Despite repeated attempts at reform, real and lasting change has been elusive. To transform public housing in Chicago, this Plan proceeds on a number of fronts.

## Capital Program

The Agency can anticipate $1.5 billion in capital funds over the next ten years, assuming constant funding levels. This compares with capital needs in excess of $3.0 billion. The Agency will demolish upwards of 18,000 obsolete housing units, mostly open gallery style high-rises. By removing these units from the inventory, the Agency will be able to concentrate its capital resources to rehabilitate/redevelop about 25,000 units. While the overall loss of project-based housing is concerning (a net loss of approximately 13,000 units), there is no alternative. The remaining inventory will be built/rehabilitated to a standard of quality sufficient to attract a mix of incomes so that public housing does not again become home to extreme concentrations of poverty. Moreover, enough units are produced to accommodate all existing lease-holders.

Although this plan is predicated on ten years of funding, the Agency intends to accelerate these improvements over five to seven years by leveraging its assets and future funding streams. Moreover, to attract additional private funds, and to access needed development capacity, the Agency will seek development teams/development proposals for all of its family properties. The determination of which teams/proposals are selected will be accomplished through a redevelopment process that will include extensive resident and community input.

Overall, it is projected that 6,000 households will need to be relocated to private market housing (Section 8) as a result of redevelopment over the next five years, a rate that is less than the growth of the Section 8 Program in recent years. Still, the Agency will monitor the pace of relocation to identify and respond to market absorption issues which may arise. All affected households will receive relocation assistance and, provided they remain lease-compliant, will be allowed to return to public housing following redevelopment.

## Property Management

The Agency will get out of the business of managing real estate, resulting in lower costs and better service. By June 2000, all properties currently managed by the CHA will be transferred to third-party, professional management organizations. Resident Management Corporations (RMCs) which are fully operational as of October 1, 1999 will remain in place. Unlike past experiences with private management, however, this time the Agency will actually provide the private firms and RMCs with the authority, the responsibility, and the resources to get the job done. In turn, the Agency will develop its contract monitoring and oversight capabilities to assure high standards of performance.

## Human Capital Development

Residents of public housing will be treated as full citizens of the City of Chicago and will have access to the same level of services. Rather than attempt to replicate those services, a strategy that only serves to further isolate public housing and its residents, and for which the CHA has neither the resources nor the skill, the Agency will invest in development-based outreach workers who will help residents to access services in the community. It is anticipated that many of these outreach workers, who will receive professional training, may be residents themselves. The Agency also plans to aggressively seek and obtain additional outside resources to meet the human capital needs of its residents.

## Protective Services

Consistent with the principle that residents of public housing will be treated as full citizens of the City of Chicago, the Agency recently transferred policing functions to the Chicago Police Department. Combined with a Department of Justice Community Oriented Policing Strategy (COPS) grant, the number of law enforcement personnel assigned to the CHA will significantly increase. As distressed properties are demolished, however, the need for dedicated law enforcement services will greatly diminish. The Plan also provides for at least 10-hours of security coverage daily at each elderly building and funds the tenant patrol program at current levels, although supervision of tenant patrols will be transferred to the private managers and RMCs.

## Admissions and Occupancy Policies

New and proposed policies are intended to encourage the development of stable communities and to reward work and responsibility. Key initiatives include: rent incentives for working families, higher standards of lease compliance, and acknowledging kinship care to keep families together.

## Section 8

Continuing with the vast improvements in the administration of the Section 8 program in recent years under private contract, the Agency will expand its landlord outreach, mobility counseling, and contract monitoring functions. Additionally, the Agency will establish a new “access improvement” fund to help landlords make units accessible to persons with disabilities.

## Section 3 and MBE/WBE

Over the next ten years, the CHA will invest over $6.3 billion in the local economy, representing the combined public housing and Section 8 budgets. The Agency is committed to assuring that this period becomes a real time of opportunity for minority businesses and for other disadvantaged firms and workers.

## HUD Waivers and Requests

Accompanying this Plan is a list of various waivers, commitments and requests that would greatly facilitate implementation. These range from relief from restrictive development rules to assurances of predictable funding.

## Towards a New Role for the CHA

This Plan contemplates much more than the physical transformation of public housing. It envisions a new role for the CHA. In the past, the CHA was primarily an owner and manager of public housing. In the future, the CHA will be a facilitator of housing opportunities. It will oversee a range of housing investments and subsidy vehicles. Where appropriate, it will own housing, but it will just as likely provide financial assistance to other private and non-profit development organizations to expand housing opportunities.

As outlined more fully in the Background section of the document, this Plan has been the result of an extensive public comment process. The Agency recognizes that resident and public comment does not end with publication of this document. CHA is committed to long-term broad community participation in the transformation of public housing in Chicago.

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# Introduction

This Plan for Transformation (Plan) outlines the major program changes, policy directions, and organizational initiatives of the Chicago Housing Authority (CHA) over the next several years.

Four events have converged to compel this Plan.

- First, as required under the 1998 Quality Housing and Work Responsibility Act (QHWRA), public housing authorities (PHAs) must undertake annual and five-year plans for fiscal years beginning January 1, 2000.

- Second, on June 1, 1999, the CHA was returned to local control. As a consequence, this Plan provides an opportunity for the new leadership team to communicate its transformation plans.

- Third, at the time that the CHA was returned to local control, the City entered into a Memorandum of Understanding (MOU) with the United States Department of Housing and Urban Development (HUD). The terms of the MOU required that 1. The Agency prepare a "Performance Compact" in six months that would "establish an action Plan and identify the regulatory flexibility, legislative flexibility, and resources necessary to achieve performance benchmarks on which we will mutually agree… HUD intends to approve an acceptable plan under the Moving to Work demonstration authority provided by Section 204 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996."

- Fourth, federal law mandates the demolition of approximately 18,000 units of CHA housing.

Submitted along with this Plan are the following companion documents:

- The Annual Public Housing Agency Plan

- The Five-Year Public Housing Agency Plan

- The Agency's FY 2000 Operating Budget

- A list of funding commitments, waivers and requests necessary to support the Plan.

# Background

On September 30, 1999, the Agency published its draft Plan for Transformation, along with its draft Annual and Five-Year Agency Plans and its List of Waivers and Requests. Collectively, those documents outlined a fundamentally new approach to public housing in Chicago. The case for change was obvious and urgent, including:

- A high concentration of extremely poor families.
- A large stock of physically obsolete family housing plagued with crime and drugs.
- A new Federal policy environment that includes mandatory building closure rules, affirmative efforts to deconcentrate poverty, and stricter performance standards, especially in the area of physical condition.
- Limited capital funds to meet needs.
- Excessive overhead costs and a lack of internal management capacity.
- Resident programs that were duplicative, poorly coordinated, and without substantive performance measures and outcomes.

**Resident & Public Participation Process**

The CHA adopted a comprehensive approach to maximize public input on the Plan.

**Resident Involvement**

In accordance with QHWRA, a Resident Advisory Board (RAB) was created to provide recommendations and comments on the Agency Annual and Five-Year Plan. The RAB consisted of the Central Advisory Council (CAC) and representatives of the Section 8 existing Certificate and Voucher Program (hereafter referred to as Section 8)[1]. The CHA provided technical assistance funds for the RAB/CAC to assist in their analysis of the Plan. The RAB/CAC created seven subcommittees to address different aspects of CHA activities, receive training on the provisions of the QHWRA, and formulate recommendations on the draft Plan to submit to the CHA. The CHA staff met with the subcommittees and the full RAB/CAC 15 times to review all aspects of the draft Plan prior to its release in September of 1999. The RAB/CAC provided CHA with extensive and detailed comments and recommendations during the public comment period.

The CHA met with the RAB/CAC both during and after the comment period ended to further amend the Plan based on resident feedback. Lengthy negotiating sessions on topics such as Resident Management Corporations, Section 3, private management contracts and relocation and redevelopment activities took place throughout the months of November and December. The CAC disagrees with portions of the Plan and has forwarded those comments and objections to the Agency.

[1] Under QHWRA, all Section 8 certificates and vouchers are to be converted to a new Section 8 Housing Choice Voucher Program. These conversions are now occurring upon lease-up or at lease-renewal.

**Task Forces**

The CHA's planning process has been one of intensive engagement with residents and the public. Public housing residents, Section 8 residents and members of interested civic, fair housing and community development organizations, as well as sister agencies and philanthropic organizations participated in task forces that provided input on CHA's performance goals and identified potential action items. These task forces covered four areas: good neighborhoods for public housing families, expanding housing options for housing choice voucher holders, service connections for both public housing residents and voucher holders, and quality of life for seniors. The sessions were rich discussions of the goals and challenges faced by CHA and other organizations in delivering quality housing and services, and yielded valuable suggestions.

**City-wide Public Meetings**

The Agency held a total of 23 Town Hall meetings, including one at each family public housing development, and briefings for senior developments by the regions into which senior resident leadership is organized. The CHA also held four regional public meetings at community venues convenient to residents of the north, south, west and central parts of the City. The CHA also conducted over 50 briefings for civic, community development, housing service and philanthropic organizations, educational institutions, faith leaders, elected and appointed officials, and others. In accordance with QHWRA, a public hearing was held at the McCormick Place Convention Center on November 16, 1999, the close of the comment period. Buses were provided to transport residents from each major development to the McCormick Place.

**Notification**

All meetings were advertised in 31 community and major regional newspapers, notifications were included with rent notices to all public housing residents, and thousands of mailings were made to interested organizations and individuals throughout Chicago. Finally, in addition to the print media, CHA discussed the draft Plan on community talk radio and television. The Plan was available at every public library, each Local Advisory Council Office, every CHA management office, CHA headquarters, and on the Internet. A toll free number was established to enable residents and the public at large to call with questions or to request a copy of the document. In all, CHA distributed over 3,600 copies of the draft Plan.

**Public and Resident Comments**

Included as an attachment to the Agency's Annual Plan is a list of the recommendations made by the RAB and a description of the manner in which the CHA addressed each of these recommendations. The CHA conducted public hearings on its Plan and considered all public comments. In consultation with the RAB, the CHA made changes to its Plan based on these comments. These comments can be organized into three main areas:

1. **Comments requesting greater clarification or articulation of Plan elements, including:**

   - How relocation would proceed and the rights of affected residents.
   - Timeframes for when redevelopment would occur.
   - The mechanics of HUD's "Section 202 Viability" test and the results of such test in Chicago.
   - Estimated number of units to be rehabilitated/redeveloped.

- The roles and responsibilities of private managers and how services would improve under such arrangements.
- How the Agency will comply with applicable accessibility and fair housing requirements in the management and redevelopment of its housing.
- The redevelopment process, including the selection of developers, the assignment of capital resources among competing developments, and the participation of residents and community partners in that process.
- The allocation of Agency resources within the context of its proposed "block grant."
- The scope of non-shelter services to be provided and, in particular, the role of "service connectors" in the Agency's new model for promoting human capital development.
- The coordination between these non-shelter services and professional private management.
- The need for, and implications of, the Agency's waiver requests.
- Security Plans.

**2. Comments expressing dissatisfaction with the current service provided by the CHA and the need for vast improvements, including:**

- Providing residents with adequate notice in the event of relocation.
- Expanded security services and better communication between law enforcement/security personnel and residents.
- Condition of the units.
- Reducing inspection turnaround times in Section 8.
- Fair but consistent lease enforcement.

**3. Comments either disagreeing with, or indicating concern over, major plan elements and principles or plan assumptions, including:**

- The loss of several thousand public housing units in the face of a tremendous shortage of affordable housing in Chicago.
- The ability of the private rental market to absorb the families to be relocated from non-viable buildings that will be torn down.
- The need to maintain "fixed" housing resources, as opposed to tenant-based assistance.
- The concentration of Section 8 vouchers in predominately minority, high poverty areas.
- The ability to provide essential social services to current residents to be relocated under the Section 8 program.
- Assurances that relocated residents will be allowed to return to public housing following redevelopment.
- Resources should be targeted to the poorest families, not diverted to higher income families in order to create mixed-income communities.
- The ability to implement the Plan if the Agency does not receive the special requests and waivers.
- The cost estimates used to determine the overall capital needs.
- The ability to address the ongoing maintenance, environmental remediation, and ADA/504 accessibility issues from occupied units during the implementation of the Plan.
- The CHA notes that the CAC objects to the Authority's submission of the Plan for Transformation prior to the HUD national deadline of January 31,2000 for submission of the Annual and 5 Year Plan.

The majority of public comments confirm the need for a complete transformation of the Agency.

**Plan Organization**

The remainder of this document is organized into eleven sections, covering each of the major areas of the Plan. Some subjects, such as accessibility, are covered under more than one section throughout the Plan.

- Goals & Core Principles
- Capital Program
- Relocation
- Property Management
- Lease and Occupancy
- Human Capital Development
- Protective Services
- Section 8
- Section 3 & MBE/WBE
- Consolidated Budget
- Timeframes and Performance Standards

# Goals & Principles

The goals under this Plan are to:

- Provide quality housing opportunities to very low and low-income households in mixed-income settings.
- Affirmatively further fair housing and assist in creating communities that are intolerant of discrimination.
- Assure that residents have access to local, state, and federal resources for which they are eligible.
- Contribute to the improvement of the neighborhoods and communities where public housing is located.
- Provide greater housing choice.
- Assure a smooth transition for families relocating as a part of CHA's redevelopment activities, minimizing the disruption on the lives of CHA families.
- Offer all lease compliant families the right of return to a new or rehabilitated public housing unit.
- Achieve standards of excellence in the delivery of services and in the administration of programs.
- Expand the number of accessible units and comply with all applicable federal, state, and local disability laws.
- Encourage business development opportunities for minorities and disadvantaged firms and job opportunities for residents, resident owned businesses, and other low-income workers.
- Maintain existing occupied units in a decent safe and sanitary condition during the implementation of the Plan, including abatement of environmental hazards and provision of 504 accessibility.

In pursuit of these goals and in the development of this Plan, CHA has adopted the following core principles:

- Residents will be treated as any other citizen of the City of Chicago. As such, the Agency will help residents access and connect to services in the community.

- The role of the CHA is to invest in or facilitate housing opportunities for very low and low-income households, including persons with disabilities. With the flexibility made possible by recent legislation, the Agency should no longer view itself as primarily an owner or manager of public housing. More broadly, the Agency can own, lease, finance, or subsidize housing opportunities as circumstances warrant.

- The CHA's priority should be to invest in properties where the Agency can assure that (1) it has the resources to sustain these properties through their useful life, (2) the property can attract and retain a mix of incomes, and (3) the housing does not stigmatize its residents.

- The delivery of management services should be property-based. On-site personnel should have the resources and authority to manage effectively.

- To the extent that a competitive market already exists to provide any given service, from architectural design to property management, the CHA should use that market to maximize service for available resources.

- The CHA will protect the rights of persons with disabilities.

- All families living in CHA-subsidized units should be working towards economic self sufficiency by seeking employment and educational opportunities. The CHA will support families in these efforts by facilitating connections to supportive services and will also encourage and support those families who attain self-sufficiency to seek homeownership and other housing opportunities in the private market through other government, non-profit and philanthropic programs.

- The CHA is committed to fully implementing this innovative and comprehensive Plan for Transformation, but recognizes that full implementation requires full approval of the Plan by HUD and where necessary, legislative revisions. The Authority is committed to assuring that all CHA residents affected by the Plan are assured access to replacement housing, a compassionate relocation process and to this end, in consultation with the RAB/CAC, will make any revisions necessitated by reduced funding, rejection of waivers, and/or legislative change request. The Agency agrees with HUD and the CAC that relocation must be consistent with and directly linked to the availability of affordable housing for very low and low income relocatees.

- The CHA will require the involvement of minority and women owned businesses and enforce Section 3 requirements.

# Capital Program

At current funding levels ($148 million in 1999), the Agency can expect approximately $1.5 billion in capital funds over the next ten years, $1.1 billion of which is available for the actual hard costs of rehabilitation/redevelopment. In contrast, the Agency's capital needs exceed $3.0 billion for the current inventory, a figure that includes only the cost to "fix as-is" and does not consider redesign. Additionally, Section 202 of the 1996 HUD appropriations bill mandates demolition of certain "distressed" developments that cannot be revitalized for less than the cost of vouchers, affecting more than 40 percent of the Agency's stock

Given these fiscal and legislative parameters, and given the untenable conditions under which many residents live, the Agency will demolish upwards of 18,000 units, primarily high-rise family properties for which there is no reasonable potential for renovation. This will allow the Agency to rehabilitate/redevelop approximately 25,000 units to a market standard that will assure long-term viability. While the Agency is intent on preserving as many hard units as possible, especially in light of the demand for affordable housing in Chicago, the demolition actions are practically and legally required. Still, this Plan will produce enough units so that, following redevelopment and rehabilitation, the Agency can accommodate all lease-compliant families residing in CHA units as of October 1, 1999.

Altogether, the Agency estimates that a total of approximately 6,000 households will need to be temporarily or permanently relocated over the next five years (See Relocation section of this document regarding both relocation estimates and services). Although it may not be possible to accommodate residents in the same unit/building or development that they formerly occupied, all families temporarily relocating will be permitted to remain or return to public housing following redevelopment, provided they remain lease-compliant.

Because of the urgent need for these improvements, the Agency plans to undertake this work over five to seven years by leveraging its assets and future capital funding streams. In other words, although it will take ten years worth of capital funds to complete this Plan, the Agency will finance these improvements over a shorter period by borrowing against funds from future years, when the need for capital will be much less.

In addition to funding all existing redevelopment commitments – for example, on-going planning and redevelopment efforts at Gov. Henry Horner Homes or Loomis Courts, Jane Addams Homes, Robert H. Brooks Homes and Grace Abbot Homes (ABLA) – the Plan fully funds the cost to rehabilitate all senior and viable scattered site units. The Plan also fully funds, after allowing for modest density reduction, the cost to rehabilitate all family properties not subject to "Section 202." The Section 202 properties consist of eight gallery high rise and five low rise and mid rise properties, accounting for some 14,000 units. The Agency does not have sufficient resources to redevelop each of these properties. To determine which of the Section 202 sites will receive redevelopment funding, and to encourage additional private financing sources, the Agency will solicit proposals from development teams. It has also requested flexibility under the Section 202 rule to allow for the rehabilitation of the mid-rise and low rise properties. Resident representatives and community partners will be involved in both establishing the criteria for selecting developers and in the actual selection process. Additionally, the Agency will provide the residents at each site with technical assistance funds to help in shaping the development program and/or re-use plans for each property.

The remainder of this section explains more fully the Agency's demolition plans, the impact of Section 202, projections of funding availability, the allocation of capital funds, the redevelopment process and accompanying selection criteria, and other redevelopment issues such as the implications of the Gautreaux Court Order.[2]

**Section 202 - Mandated Demolition**

Under Section 202[3], demolition is required when the monthly per-unit cost to renovate and maintain any contiguous property with more than 300 units and with a vacancy rate in excess of 10 percent exceeds the monthly cost of a housing voucher. Of the Agency's 38,000 units, approximately 14,000 were subject to this test and all 14,000 failed (several thousand more units were not technically subject to the test because the Agency had already agreed to demolish them under HOPE VI and other existing redevelopment projects). Of the properties that failed under the current regulation, eight contain or are comprised of open gallery high rises and five are low rise and mid rise properties. While the Agency agrees that the gallery high rises are not viable, it believes that with proper investment and management, many if not all of the low rise and mid rise properties subject to Section 202 can be viable. Consequently, the Agency has requested from HUD an augmentation of the viability test to allow it to retain these properties if 1) sufficient market interest exists for redevelopment and 2) the properties can attract a mix of incomes. The CHA will not consider proposals to rehabilitate the open gallery high rises.

**Gallery Style High Rises**

Of the Agency's 38,776 units, approximately 15,000 units are contained in open gallery style high rises. Open gallery style is defined as eight or more stories with hallways and elevator entrances that are fully or partially exposed. The Plan for Transformation calls for the demolition of these units.

These gallery high rises were built between 1953 and 1966. From the very beginning, CHA experienced great difficulties with this building design, ranging from problems with heating systems to frequent elevator failures. Design flaws, coupled with a lack of maintenance and limited capital improvements since initial construction, have rendered these buildings vulnerable to system failures, particularly in the winter months. Furthermore, recent experience demonstrates that even after spending significant funds for emergency repair and rehabilitation, the CHA cannot guarantee that a gallery high rise can survive the winter. Renovation of these buildings is not economically feasible.

**Funding Availability**

In 1999, the Agency received approximately $148 million as its formula share of capital funds under the Federal Comprehensive Grant Program (soon to be renamed the Public Housing Capital Fund). Assuming constant funding at this level, the Agency would receive approximately $1.5 billion over 10 years (FY 2000 - FY 2009), including $33.9 million in carry-over funds from FY 1999. In previous years, the Agency dedicated only about 57 percent of its capital grant for hard costs, with significant amounts spent on such non-capital uses as law enforcement and general administration. To retain as many hard units as possible, the Agency has

[2] Pursuant to a 1987 order of the Federal District Court in Gautreaux vs. CHA et. al., a Receiver, Daniel E. Levin and The Habitat Company, has and exercises all powers of CHA respecting the development of CHA non-elderly housing. Throughout the Capital Program section of the Plan for Transformation, "CHA" will signify CHA and/or the Receiver, acting in their respective capacities.

[3] "Section 202" refers to Section 202 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996. As required under this law, a cost test must be performed for all affected properties. See the Annual Plan for a more complete description of the cost test and the results.

restructured its budget to substantially increase the funds for building improvements, shown below. However, even with these adjustments, there are insufficient funds to repair or replace 38,000 units.

**Ten Year Capital Plan Summary Budget**

| Category | Amount | Percent |
|---|---|---|
| Project Management | $48,000,000 | 3% |
| A&E Services and Resident TA | $94,288,000 | 6% |
| Capital Maintenance | $156,000,000 | 10% |
| Building Improvements | $1,111,837,200 | 74% |
| Contingency | $111,030,000 | 7% |
| **Total** | **$1,513,900,000** | **100%** |

This amount, even after budget restructuring, is far less than the more than $3.0 billion that the Agency would need to rehabilitate all of its existing stock.

Included with the List of Commitments, Waivers and Requests that accompanies this Plan is a request that the Agency's capital grant be frozen for ten years so that it can be assured of this funding stream. A one percent reduction in the Agency's current capital grant represents about $15 million over ten years. Additionally, the Agency has requested funds apart from its annual capital funds to pay for demolition ($85 million) and relocation and related counseling services ($25 million).

**Allocation of Capital Funds**

For purposes of funding allocations, the Agency has grouped its properties into five main categories: Existing Redevelopment Commitments, Senior Buildings, Scattered Sites, Non-202 Family Properties, and 202 Family Properties. Of the $1.1 billion projected to be available for hard costs for actual rehabilitation/redevelopment, each category is targeted to receive the following amounts:

- **Category 1: Existing Redevelopment Commitments.** A total of eight property clusters have either approved redevelopment plans or plans that are well along in the process. This represents 9,561 units, of which 3,659 are occupied. The capital program includes $149 million to fund these existing redevelopment projects, many of which are subject to court orders. These funds are needed to supplement other funding such as HOPE VI. Redevelopment plans for two of these properties – ABLA and Madden Park Homes/Ida B. Wells Homes – have not been finalized. Consequently, the total number of units anticipated to be demolished (7,724) and rebuilt (5,353) for this category is based on current estimates and may be revised once redevelopment plans are finalized.

- **Category 2: Senior Buildings**. The Agency has 58 senior buildings, totaling 9,480 units. The capital program includes $350 million for complete rehabilitation. This figure includes funds to install air conditioning, required accessibility improvements, and other amenities.

- **Category 3: Scattered Sites**. The Agency owns 2,922 scattered site units. Of these, the Agency estimates that 8 percent (236 units) are in such poor physical condition that they do not warrant continued investment. For the remaining 2,686 scattered site units, the Agency will allocate $77 million for their rehabilitation. The Agency will conduct a detailed physical needs assessment of its scattered site program to determine the actual units that will be disposed of or demolished. The Agency plans to work with non-profit organizations and other groups on creative re-use options. No scattered site units will be demolished that can be reasonably rehabilitated as public housing.

- **Category 4: Non-202 Family Properties**. A total of ten family properties (3,051 units) are not currently subject to the Section 202 viability test. The capital program allocates $107 million to these properties. This funding is based on the cost to rehabilitate all units with the exception of: (1) Lawndale Complex, which is slated for demolition, and (2) Washington Park low-rises, where it is estimated that half the units will be demolished based on their condition. In order to maximize funds, the CHA will seek development partners for Category 4 properties (see process described below). Because of their age and design, modest density reduction is also anticipated for a number of the properties in this category. Following redevelopment in Category 4, the Agency's goal is that the total number of public housing units be not less than the current number of occupied units (2,254).

- **Category 5: Family Properties Subject to Section 202.** The capital program allocates the remaining $429 million to the 13 Section 202 properties and Randolph Towers (The Agency has agreed to review with the CAC and the Washington Park LAC, the feasibility of retaining this recently renovated structure which was not originally subject to the Section 202 viability test). The CHA will make available the remaining $429 million to rehabilitate or redevelop these properties. While this amount cannot fully replace all units identified in Category 5, it is estimated that this funding will produce at least 5,000 new or rehabilitated public housing units. To the extent that total funding available to the Agency is less than the amounts projected, fewer dollars will be made available to the Category 5 properties.

In order to accelerate capital improvements, CHA proposes to leverage its assets and future funding streams through a minimum of two general financing initiatives. The first financing initiative covers the construction costs to rehabilitate the senior and scattered site properties (Categories 2 and 3) and will likely occur in late 2000. Construction and rehabilitation schedules for Categories 4 and 5 will dictate the exact timing of the second financing, estimated to be in the Fall of 2001.

**Summary of Capital Program**

| Grouping | Funding Allocation | Existing Units | Occupied | Demolition | Net Hard Units | Net Loss of Hard Units |
|---|---|---|---|---|---|---|
| | | | | | | |
| Category 1 – Existing Redevelopment Commitments | $149,000,000 | 9,561 | 3,659 | 7,724 | 5,353 | 4,208 |
| Category 2 – Senior Buildings | $350,000,000 | 9.480 | 8,044 | 0 | 9,480 | 0 |
| Category 3 – Scattered Sites | $77,000,000 | 2,922 | 2,400 | 236 | 2,686 | 236 |
| Category 4 – Non-202 Family Properties | $107,000,000 | 3,051 | 2,254 | 797 | 2,254 | 797 |
| *Subtotal* | *$683,000,000* | *25,014* | *16,357* | *8,757* | *19,773* | *5,241* |
| Category 5 – Low-rises, Mid-rises, and non-gallery high rises | N/A | 4,876 | 3,987 | 889 | N/A | N/A |
| Category 5 – Gallery High-rises | N/A | 8,886 | 4,146 | 8,886 | N/A | N/A |
| *Subtotal* | *$429,000,000* | *13,762* | *8,133* | *9775* | *5,000* | *8,762* |

| | | | | | | |
|---|---|---|---|---|---|---|
| **Totals** | $1,112,000,000 | 38,776 | 24,490 | 18,532 | 24,773 | 14,003 |

## Chicago Housing Authority
## Capital Plan
*Source: Unit Status Report 10/01/99

| | Existing Units* | Occupied Units* | Demo Units | After Revitalization Total | After Revitalization Public Housing | CGP Funding | GGP Cumulative | Hope VI and Other Federal Funds |
|---|---|---|---|---|---|---|---|---|
| ***Category 1 - Existing Redevelopment Commitments*** | | | | | | | | |
| Gov. Henry Horner Homes | 1,743 | 682 | 1,201 | 1,136 | 1,086 | 32,200,000 | | 73,952,120 (1) |
| Frances Cabrini Extension North | 926 | 152 | 926 | 2,300 | 700 | 25,000,000 | | 58,993,750 |
| ABLA (2) | 3,235 | 1,079 | 2,776 | 3,278 | 1,463 | 18,000,000 | | 51,953,250 |
| Wells/Madden/Darrow/Wells Extension (3) | 2,891 | 1,426 | 2,821 | 2,530 | 1,008 | 39,000,000 | | 43,300,000 |
| Robert Taylor Homes B HOPE VI (4) | - | - | - | 251 | 251 | - | | 23,500,000 |
| Raymond M. Hilliard Center | 710 | 307 | | 710 | 390 | 33,500,000 | | |
| Washington Park Homes (5) | 56 | 13 | - | 56 | 14 | 1,300,000 | | |
| Lakefront (6) | - | - | - | 964 | 441 | - | | 40,121,148 |
| *Subtotal* | *9,561* | *3,659* | *7,724* | *11,225* | *5,353* | *$149,000,000* | *$149,000,000* | *$291,820,268* (7) |
| ***Category 2 - Senior Developments*** | *9,480* | *8,044* | *-* | *9,480* | *9,480* | *$350,000,000* | *$499,000,000* | |
| ***Category 3 - Scattered Sites*** (8) | *2,922* | *2,400* | *236* | *N/A* | *2,686* | *$77,000,000* | *$576,000,000* | |
| ***Category 4 - Non-202 Family Properties*** (9) | | | | | | | | |
| Cabrini Ext. Lincoln | 18 | 18 | | | | | | |
| Lake Parc Place | 300 | 235 | | | | | | |
| LeClaire Courts | 300 | 270 | | | | | | |
| Washington Park Homes Low-rises | 488 | 226 | | | | | | |
| Lawndale Complex | 187 | 1 | | | | | | |
| Lawndale Gardens | 128 | 120 | | | | | | |
| Julia C. Lathrop Homes | 925 | 747 | | | | | | |
| Bridgeport Homes | 155 | 136 | | | | | | |
| Wentworth Gardens | 422 | 386 | | | | | | |
| Gov. Frank Lowden Homes | 128 | 115 | | | | | | |
| *Total* | *3,051* | *2,254* | *797* | *N/A* | *2,254* | *$107,000,000* | *$683,000,000* | |
| ***Category 5 - 202 Family Properties*** (10) | | | | | | | | |
| ***Mid-rises and Low-rises*** | | | | | | | | |
| Frances Cabrini Rowhouses | 586 | 466 | | | | | | |
| Trumble Park Homes | 486 | 382 | | | | | | |
| Harold L. Ickes Homes | 1,006 | 823 | | | | | | |
| Dearborn Homes | 800 | 603 | | | | | | |
| Altgeld Gardens - Phillip Murray Homes | 1,998 | 1,713 | | | | | | |
| *Subtotal* | *4,876* | *3,987* | *889* | *N/A* | *N/A* | | | |
| ***Gallery High-rises*** | | | | | | | | |
| 1230 N. Burling | 134 | 106 | 134 | | | | | |
| Frances Cabrini Extension South | 597 | 474 | 597 | | | | | |
| William Green Homes | 968 | 550 | 968 | | | | | |
| Rockwell Gardens | 1,136 | 439 | 1,136 | | | | | |
| Stateway Gardens | 1,644 | 689 | 1,644 | | | | | |
| Robert Taylor Homes A | 1,734 | 785 | 1,734 | | | | | |
| Robert Taylor Homes B | 2,050 | 774 | 2,050 | | | | | |
| Washington Park Homes High-rises | 468 | 192 | 468 | | | | | |
| Randolph Towers (11) | 155 | 137 | 155 | | | | | |
| *Subtotal* | *8,886* | *4,146* | *8,886* | *N/A* | *N/A* | | | |
| *Total, Category 5* | *13,762* | *8,133* | *9,775* | *TBD* | *5,000* | *$429,000,000* | *$1,112,000,000* | |
| ***TOTAL ALL CATEGORIES*** | *38,776* | *24,490* | *18,532* | *TBD* | *24,773* | *$1,112,000,000* | | |

**Notes:**

**1.** Includes $55,516,820 for Phase I of Gov. Henry Horner Homes.
**2.** Units and CGP $ needed are estimates pending final master plan.
**3.** Pending 2000 Hope VI Application for $35 million. Have $8.3 million in MROP Funds. Unit counts and mix may change based on results of ongoing master planning process.
**4.** Only demolition of five (5) buildings; all units to be replaced off site. Demolition units shown in Category 5.
**5.** Sale of 56 CHA units to non-profit developer in exchange for lease of 14 newly renovated units and 42 Section 8 units in nearby development.
**6**. Under Consent Decree w/Lakefront Community Organization, CHA is to develop 241 replacement units for Lakefront buildings in North Kenwood-Oakland neighborhood (which will be built on several sites) and an additional 200 outside of North Kenwood-Oakland.
**7.** Does not include an additional $21 million for which the Court in the Gautreaux case has not designated a location.
**8.** Assumes 8% of units do not warrant continued investment.
**9.** Assumes demolition is equal to number of vacant units.
**10.** The number of units which will be rebuilt for each sub-category will not be known until the planning process has been completed. However, a minimum of 5,000 is projected for all Category 5.
**11.** Not subject to 202 but is a Gallery Style High-rise.

**Redevelopment Process**

A Working Group comprised of representatives from CHA, the LAC, the City of Chicago, community partners, the Gautreaux plaintiffs/Receiver (where appropriate) and other appropriate parties will use the process described below to redevelop Category 4 and 5 properties. The Working Group will consider proposals, consistent with this Plan, that could include rehabilitation, new construction or a combination of the two. (All types of activity will be collectively called "redevelopment" hereafter.) The Working Group will accept proposals that offer the greatest value, based on criteria discussed below. The Working Group expects to obtain proposals that will attract other sources of funds, thereby maximizing the number of public housing units that can be rehabilitated/produced. For the Category 5 properties, this process will determine which properties are truly viable and can, with continued investment, be maintained at a market standard and attract a mix of incomes over time. In the case of the Category 4 properties, where there is not sufficient interest in or advantage to private investment, the Agency will renovate these properties as traditional public housing. All public housing units will be available first to lease-compliant residents as of October 1, 1999.

The redevelopment process chart defines the tasks and responsibilities within the Working Group.

**Redevelopment Process Chart for Category 4 and 5 properties**

| TASKS -- STAGE ONE | CHA | CAC | LAC | Habitat | City | Gautreaux Plaintiffs | Community | HUD |
|---|---|---|---|---|---|---|---|---|
| (1) Establish overall criteria for redevelopment & rehabilitation proposals. Establish selection criteria to evaluate responses | X | X | X | X | X | X | X | X |
| (2) Using criteria from Step (1), issue Request for Qualifications (RFQ) for development teams. Respondents submit qualifications for developing mixed-income residential housing for specific properties. Respondents may submit proposals to work with more than one site. | X | | | | | | | |
| (3) Act as selection panel and recommend development teams at each site. For sites with adequate interest, one or more teams may be selected per site. | X | | X | X | X | X | X | |
| (4) Confirm selection of development teams | X | | | X | | | | |

| TASKS -- STAGE TWO | CHA | CAC | LAC | Habitat | City | Gautreaux Plaintiffs | Community | HUD |
|---|---|---|---|---|---|---|---|---|
| (5) LAC, residents, and community work with selected developers from Stage 1 to prepare proposals for redevelopment. | | | X | | | | X | |
| (6) Rate and Rank final proposals. Consult with Gautreaux Court to ensure compliance and, where needed, make requests for Revitalizing Area designation. | X | | X* | X | X | X | | |

* NOTE: In Step 6, LAC participation in selection process contingent upon extent of involvement in any redevelopment proposals received.

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| (7) CHA Board and Habitat selects proposals for funding, determines allocation of capital funds. Based on availability of dollars allocated, establish phasing of redevelopment. | X | | | X | | | | |
| (8) Redevelopment Begins | | | | | | | | |

Re-use planning will begin for any Category 5 property where insufficient interest exists for redevelopment (after Stage One) or if the property's development proposal is not selected for funding (after Stage Two).

**Proposal Criteria**

The Working Group will work to develop the criteria for selection of both development teams (Stage One) and development proposals (Stage Two). Such criteria will include the following:

**Minimum Threshold Criteria**

All proposals must at least demonstrate the following to be considered for funding:

- In the case of proposals involving the construction of new public housing, compliance with the Gautreaux consent decree and the capability of receiving a Revitalizing Order from the Court (See Gautreaux discussion).
- Financial feasibility, including realistic assumptions with respect to allocations of funds from other public and private sources and supported by market data.
- Consistent with the Plan, proposals which include demolition should provide justification for new construction over rehabilitation.
- Long-term ability to sustain affordability.
- Compliance with Fair Housing and ADA/504 requirements and, where practical and appropriate, the Chicago Department of Housing's new "visitability" standards.
- Compliance with CHAs M/WBE and Section 3 requirements.

**Selection Criteria**

Proposals that meet the minimum threshold criteria will then be evaluated on the strength of the following:

- The extent to which the proposed redevelopment or rehabilitation meets a market standard of quality and can, over time, attract and retain a mix of incomes.
- The extent to which the proposed project leverages private funds.
- The extent to which the proposal accommodates lease-compliant CHA residents.
- The extent to which the proposal uses public funds (CHA, city, state, federal) and other public assets efficiently, such that the impact of public resources is maximized.

- The extent of non-housing benefits to residents such as funding for or provision of social services, business and employment opportunities, community facilities and green spaces.

- The extent to which public housing units relate to and are integrated into the larger community, including mixing public housing units with affordable and market rate units in the development, and providing new development and rehabilitation that is compatible with the surrounding neighborhood.

- The extent to which proposals consider strategic plans developed by the LAC's for their respective sites.

- The extent to which proposals have a commitment to include minority and women owned businesses, resident owned businesses and Section 3 resident employment.

| Timeline for Redevelopment Process | Date |
|---|---|
| 1. HUD approves CHA's Plan for Transformation | January, 2000 |
| 2. The Working Group establishes selection criteria | March, 2000 |
| 3. RFQs released for Category 4 and Category 5 properties | March, 2000 |
| 4. RFQ responses due | May, 2000 |
| 5. Development Teams Selected | June, 2000 |
| 6. CHA consults with Gautreaux Court, where appropriate to ensure compliance and seek Revitalizing Orders. | As needed |
| 7. The Working Group plans for redevelopment with selected development teams | July - November, 2000 |
| 8. Property-specific proposals due to CHA | December, 2000 |
| 9. CHA makes funding decisions among proposals for Category 4 and Category 5 properties | April, 2001 |
| 10. Construction starts for initial Category 4 & 5 Properties | Fall 2001 - Spring 2002 |

For a more complete timetable, see Exhibit 6. The timetable is subject to HUD approval of the Plan and the allocation of capital funds.

**Other Redevelopment Issues**

**Gautreaux**

In 1966, Dorothy Gautreaux (Gautreaux) and other tenants and applicants for public housing in CHA brought suit against the CHA and HUD, claiming that the agencies employed racially discriminatory policies in the administration of Chicago's low rent public housing program. The suit charged that public housing tenants were forced to live in segregated areas of the City by virtue of the CHA's tenant assignment and site selection plan.

In 1969, the court ruled for the Gautreaux plaintiffs and entered a Judgment Order, which, with subsequent modifications, creates several restrictions on CHA's ability to redevelop new public housing units. First, CHA was permanently enjoined from constructing public housing in any "Limited Area" (a

neighborhood having more than a 30 percent African American population) unless an equal number of public housing units are constructed in "General Areas."

Secondly, construction of new public housing in neighborhoods is also limited by project size (no more than 240 people at one location) and density (the total number of public housing units in a census tract cannot exceed 15 percent of the total number of apartments and homes). Finally, in 1987, due to the slow pace of CHA's redevelopment activities in the 1970s and 1980s, the Court in 1987 appointed a Receiver, The Habitat Company, to administer CHA's new housing construction. The CHA cannot construct new public housing units without the involvement of The Habitat Company.

The Gautreaux restrictions regarding where units can be built may be waived if the court determines that redevelopment in a Limited Area qualifies as a "Revitalizing Area." Revitalizing Area orders allow the construction of some number of new family public housing units without matching construction in General Areas. The "revitalizing" circumstances must support a reasonable forecast of economic integration, with the longer-term possibility of racial integration. In the determination of Revitalizing Areas, the court takes into account such factors as: the geographic dispersion of units in the neighborhood and on the site; number of units to be built back on site; income mix; amenities; and other investment in the area.

Revitalizing orders have already been issued for Cabrini Green (partial), Henry Horner, ABLA, and North Kenwood Oakland. With the amount of CHA and private funds to be invested in public housing communities, CHA expects the court will find that many CHA communities can be designated Revitalizing Areas. As redevelopment proposals for individual properties move forward, CHA will confer with the Gautreaux Court for treatment of the property.

**Community Involvement**

CHA is committed to involving CHA residents and local communities in the redevelopment process. In the redevelopment process for CHA family properties, the Working Group, comprised of CHA residents, local community partners, the City of Chicago, the Gautreaux plaintiff's/Receiver (where appropriate) and other appropriate parties, will work with developers they help to select in formulating proposals for CHA's consideration. The CHA will provide a minimum of $1.2 million in technical assistance funds for resident groups. Additionally, local foundations have expressed interest in supporting this initiative.

**Lease Compliance**

There will be sufficient time for all families to become lease compliant. CHA will work with families to achieve lease compliance, as defined in the CHA Admissions & Occupancy Policy.

**Resident Services**

Throughout the redevelopment process, CHA will work to ensure the continued availability of services to residents and will include existing service agencies in the redevelopment planning process. All redevelopment plans will include a service component.

**Environmental issues**

When creating and implementing redevelopment plans, CHA will minimize resident exposure to possible contaminants by:

- Removing or permanently encapsulating all components covered with lead-based paint or asbestos.
- Experimenting with native grasses and plants known to reduce the bio-availability of contaminants when landscaping.
- Informing potential rehabilitation contractors of the presence of lead-based paint and requiring all contractors to comply with all local state and federal lead laws.
- Including strict dust control provisions in all demolition contracts.
- Maintaining an Environmental Compliance Officer, charged with monitoring compliance with all applicable local, state, and federal environmental laws.

**Accessibility**

CHA is in the process of procuring services for the 504 Self-Evaluation and Transition Plan, as required by 24 CFR 8.25 (c) g. The Self-Evaluation and Transition Plan will create the blueprint for CHA to comply with Section 504 and Fair Housing laws. Such plans will be incorporated into all redevelopment projects and the capital plan for properties to be rehabilitated. Additionally, CHA will establish a monitoring system to ensure that all rehabilitation and new construction maximizes accessibility for all residents and complies with Section 504 and fair housing requirements.

# Relocation

This section of the Plan addresses relocation issues, including: the number of households to be relocated to Section 8 housing, market absorption, services provided to relocating families, and rights of return. The CHA intends to carry out its relocation activities compassionately, understanding that such moves can be extremely disruptive to affected families. No building will be demolished until each lease-compliant family has been provided suitable relocation services, including adequate notice of the Authority's intention to close the building.

**Section 8 Relocation**

The number of households to be relocated to Section 8 housing is estimated to be less than 6,000, or approximately 1,200 annually over the next five years. (See chart.) Because of the extremely high vacancy rate in the targeted properties, the number of households to be relocated is far less than the number of units to be demolished. Based on the results of the Metropolitan Planning Council's 1999 Regional Rental Market Analysis, the market can absorb this level of relocation activity. Projected entry into the market using Section 8 is at a rate that is less than the growth of the Agency's Section 8 program in recent years. However, in compliance with the HUD letter of November 16, 1999, the number of displaced families using Section 8 in any given year cannot exceed a factor of the number of units available to such families. HUD has agreed to survey vacancy and rent levels to determine the actual vacancy rates amongst landlords and provide such information to CHA on an annual basis. In conducting its study, HUD will also examine actual rates of usage by Section 8 families who lease-up.

| Category | Existing Households | Likely Number to be Relocated to Section 8 | Comment |
|---|---|---|---|
| Existing Redevelopment Commitments | 3,659 | 1,250 | Based on preliminary Housing Choice studies performed over the last two years, CHA assumes that 30% of Henry Horner Homes, ABLA, Cabrini Ext. North and Madden Park Homes/Ida B. Wells residents will choose Section 8 permanently. The remainder are temporary Section 8 vouchers to be used during redevelopment. |
| Senior Buildings | 8,044 | 0 | All internal transfers |
| Scattered Sites | 2,400 | 0 | All internal transfers |
| Non-202 | 2,254 | 0 | All internal transfers |
| Section 202 Mid-rises and Low-rises. | 3,987 | 1,196 | Assumes most of these properties will eventually be retained and, since most transfers will occur on-site, not more than 30% of current residents will need to be relocated to Section 8. |
| Gallery High-rises | 4,146 | 3,316 | Assumes that 80% will need to be relocated to Section 8, assuming natural turnover and a modest number of transfers to other public housing. The availability of inter-development transfer units will be limited by the need for intra-development transfers in redevelopment projects. |

| | | | |
|---|---|---|---|
| Totals | 24,490 | 5,762 | |

**Rights to Return to Public Housing**

Following redevelopment, all families relocating into Section 8 housing with a lease effective date on or after October 1, 1999, will have the right to return to public housing. However, as a practical matter, the Agency cannot assure the return to the same unit, building, or development, although the Agency will make reasonable efforts to accommodate such requests.

**Relocation Services**

- **Modernization projects**. Where a property is to be modernized but not demolished or redeveloped (for example, senior buildings), relocation will occur mostly within the development as a transfer to another public housing unit. Typically, the contractor begins with a portion of the site or building that is vacant, rehabilitates it, and then property managers transfer the first group of families into completed units. The contractor then moves to the units just vacated and starts the process anew. In such circumstances, the Agency will arrange for the physical move and will pay for the necessary utility reconnection charges.

- **Redevelopment projects**. For buildings that are to be demolished or redeveloped, residents who need to be relocated will be given the option to transfer to other public housing or obtain a Section 8 voucher. Families will receive extensive pre-move counseling and assistance in accessing services. Families relocating with Section 8 will also receive mobility counseling so they can make informed choices and secure adequate housing. The Agency will also provide post-move counseling. The Agency will arrange for the physical move, will pay for necessary utility reconnections, and will also offer assistance with security deposits.

**Relocation Plans**

Over the past several years, the Agency has closed a number of low-occupancy and physically obsolete buildings and transferred families, primarily, to other CHA properties, referred to as "building consolidations." The Agency will not conduct any further building consolidation unless such actions are necessary to protect the health and safety of CHA residents or in the event of an emergency. Relocation plans will be prepared in tandem with the larger redevelopment plans for these properties. The goal of the Agency is to provide each affected resident, barring emergencies, with at least 120 days notice of the need to relocate. The Agency is reviewing procedures for relocation, produced by numerous stakeholders during meetings held over the past year. The CHA will finalize and implement these procedures in early 2000.

**Lease Compliance**

CHA is committed to assisting families in becoming lease-compliant within a reasonable amount of time. The CHA will institute a pre-screening policy for families moving to Section 8. With advanced notice of moves, residents who are not lease-compliant will be given a reasonable period of time to achieve lease compliance. Criteria used to determine lease compliance are specified in the lease and occupancy section of this document. The particulars used to verify compliance issues

are outlined in the CHA screening procedures, an attachment to the agency-wide Admissions and Occupancy Policy. The CHA will assess lease compliance, giving full consideration to mitigating factors and evidence of rehabilitation or sustained improvement.

**Relocation Contract**

CHA is committed to adopting a lease amendment affirming residents rights under the relocation process. The Agency is currently negotiating such an addendum with the RAB/CAC.

# Property Management

Approximately 50 percent of the Agency's public housing stock is currently managed by private firms, 40 percent by Agency staff, and 10 percent by Resident Management Corporations (RMCs). Regardless of the management model, and against industry practice, the Agency centrally maintains control of major building services – non-routine maintenance, security, evictions, maintenance supplies, and more. This has resulted in both high costs and poor accountability.

The Agency plans to place all remaining senior properties under third-party managers on or around February 2000, and all family properties by July 2000. At the same time, the Agency will dramatically restructure its relationship with its private managers and RMCs. It will shift authority and responsibility for the day-to-day management to the private managers and RMCs. It will also dramatically increase the operating funds provided to private managers largely by reducing overhead and other centralized costs. For improved oversight, it will also strengthen its current system of contract monitoring and quality assurance in order to hold managers accountable for better performance. Property managers and RMCs will have the resources and the authority to do their jobs well, and the CHA will be in a position to ensure performance, as described below.

**Authority and Responsibility**

In hiring private managers and RMCs in the past, the Agency retained many of the day-to-day management and maintenance responsibilities, from rent collections to work order intake. The Agency will now transfer to private managers and RMCs the functions that are typically performed by fee-managers in the conventional market (See Exhibit 2). This change is not only necessary to reduce costs and establish clearer lines of authority/responsibility, but is also essential in the Agency's efforts to recruit professional firms and promote RMCs.

**Accountability**

For better oversight, the Agency will strengthen its contract monitoring systems. The contract administration unit will be expanded from current staffing of 10 to 33. The Agency will develop a resident training, internship and employment program to provide opportunities to those residents seeking careers in property and asset management. The increased staffing will enable CHA to expand its quality assurance efforts. Each asset manager will be assigned responsibility for approximately 3,000 units. The Agency's management information system is being upgraded so that key performance data on each property – rent collections, work order response times, occupancy, etc. – will be available on-line to each asset manager.

**New Management Contract**

The change in responsibilities necessitates an entirely new management contract between the Agency the private third party managers. The Agency has drafted a proposed management contract, with the input of the CAC/LAC leadership, and has included quality assurances provisions to hold all private managers and RMCs to the same standards of accountability and to require all property managers and RMCs to enter into a uniform contract. This new contract is one of the reasons why the Agency will re-bid all of its properties, not just those that are currently managed in-house.

**Resources**

At the heart of the Agency's transformation plan is the development of a new project-based budgeting system and substantially increased funding for the property budgets. With the transfer of the responsibility for maintaining the properties to professional management companies and RMCs, the Agency will also assign the resources to get the job done. Beginning with the new management contracts, the Agency will assign non-utility budgets, on average, of $300 per unit monthly (PUM) to each property, including $40 PUM for capital maintenance. This figure is substantially more than current funding. Exhibit 3 shows the proposed allocation of operating budgets by property types.

**Annual Management Plans**

Each year, the private managers and RMCs will be required to prepare an Annual Management Plan for each property. This Plan will include specific goals and objectives for the property. In developing these annual management plans, the private managers and RMCs will be required to meet with, and obtain input from, residents. The management plan will require private managers and RMCs to submit a document outlining their annual plan for routine maintenance, preventive maintenance, capital plan, vacancy reduction, security, rent collection budget allocations, and grievance procedures. Once approved, these plans will form the basis for monitoring each firm's performance.

**Resident Management Corporations (RMCs)**

The CHA strongly supports resident management of the CHA-owned properties and will negotiate new contracts with RMCs on the same terms as private managers (budgets, rules, and performance standards). For RMCs in formation or in training, the RFPs for private managers shall clearly state all existing obligations between CHA and potential RMCs and the successful respondents shall assume CHA obligations as appropriate.

**Environmental issues**

The CHA will require that all private managers and RMCs comply with all local, state and federal environmental laws. The CHA will also maintain a lead-poisoning prevention and response team. The Agency will seek outside resources to continue and expand environmental and health prevention activities.

**Architectural and Engineering Service**

The Agency will soon procure multi-year Architectural & Engineering (A&E) services that are assigned to specific building types (elderly, scattered site, etc.). This will improve familiarization and continuity in the delivery of professional services, thereby expediting the completion of major capital improvements and rehabilitation.

**Accessibility**

The CHA will provide Section 504 and Fair Housing training to Agency staff by June 2000. Additionally, CHA will require that all key private management and RMC staff attend Section 504 and Fair Housing training.

**Exhibit 2**
**Summary of Major Changes in Private Management & RMC Contracts**

| | | | |
|---|---|---|---|
| Rent Collections | Rents are currently sent to a centralized "lock box" and entries are maintained by the CHA. The CHA also sends out rent statements and late notices. These functions will be transferred to the managers, who will collect rent on site, enter data into the Agency's integrated computer system, and generate all respective notices. | Utility Management | The private managers and RMCs are not currently involved in either the payment of utility bills or the monitoring of utility consumption. Water and sewer bills will now be sent directly to the manager for payment. Because of well-head arrangements and existing energy performance contracts, the Agency will continue to arrange for payment for gas and electric bills, but will explore ways to decentralize these arrangements as well. |
| Applicant Screening | With the adoption of site-based waiting lists, the screening of applicants will be handled on-site. | Evictions | The private managers and RMCs will now be responsible for handling of evictions and securing appropriate legal representation. |
| Security Services | The procurement and administration of security guard contracts, currently centralized, will be transferred to the private managers and RMCs. | Financial Reporting | Current financial reporting requirements will become standardized and streamlined, with most to be submitted electronically. |
| Force Account | Work currently performed by Agency "force account" crews, mostly in the area of vacancy preparation and environmental remediation, will be transferred to the private managers and RMCs. | Heating Plant Maintenance | The responsibility for heating plant maintenance will be incorporated into the new private management and RMC contracts. |
| Security Deposits | The administration of the security deposit accounts will be transferred to the private managers and RMCs. | Emergency Maintenance | Responsibility for all emergency maintenance work will be transferred to the private managers and RMCs. |
| Non-routine Maintenance | Centralized Agency crews currently perform most non-routine maintenance work. Each property will be assigned $40 PUM for non-routine maintenance, which will permit the private managers and RMCs to hire qualified contractors or supplement existing staff. | Work Order Intake | The Agency operates a central "work order control center" that receives all work order requests from residents. This function will be disbanded and residents will call their respective management office to place a work order. |

| | | | |
|---|---|---|---|
| Payment of Operating Subsidy | Under the current structure, the management company incurs operating costs and then requests monthly reimbursements from the Agency. Consistent with practices in the conventional market, the Agency will establish a monthly payment schedule for operating subsidy to the property. These operating subsidies will be paid at the beginning of each month, eliminating the need for this monthly reconciliation of actual expenses. | Payment of Management Fee | Also consistent with standards in the conventional market, the private firms and RMCs will invoice the project for payment of their management fee rather than wait for Agency reimbursement. The Agency will then post-audit fee payments. |
| M/WBE and Section 3 | Implementing the CHA MBE/WBE and Section 3 requirements will be transferred to the private managers. | Emergency Services | Private managers and RMCs will be responsible for emergency service linkages, including board-up services and emergency relocation assistance. An emergency and evacuation plan will be prepared as a part of the management plan. |

**Exhibit 3**
**Assignment of Non-utility Operating Budgets, by Property Type**

With the new management contracts (to be fully implemented by July, 2000), the Agency will assign an average of $300 per unit monthly (PUM) in non-utility funds to each property, excluding "deprogrammed" units. A deprogrammed unit is a vacant unit in a building that is targeted for demolition and where the Agency will not prepare the unit for re-occupancy. Deprogrammed units will receive approximately $192 PUM in non-utility funds, consistent with the lower funding received from HUD for such units.

The budgets assigned to each property will be exclusive of Agency overhead, meaning that these amounts represent what is actually available to operate the properties. Other than the pro-rata share of the Agency's insurance costs (about $5-$10 PUM), there will be no Agency charge-backs since each property will procure all of its own services and supplies.

While the overall average will be $300 PUM (except deprogrammed units), the amounts assigned to different building types will vary. For FY 2000, these allocations will be on the order of the following:

| Type | Approximate Units | Non-utility PUM |
|---|---|---|
| Senior | 9,480 | $270 |
| Family Low-rise | 5,500 | $300 |
| Family Mid-rise | 5,500 | $320 |
| Family High-rise | 12,000 | $300 |
| Deprogrammed Units | 6,000 | $192 |

The exact amount to be assigned to each property is currently being finalized. The above figures include $40 PUM for capital (extraordinary) maintenance. The amount to be assigned to Family High-rises reflects the fact that many of these buildings are slated for demolition and that, as units are vacated, they will not be prepared for re-occupancy.

Finally, the above amounts do not include $5 million (annually) for security. Approximately $3 million of this amount will be used to provide at least 10-hours of contract security service daily at each senior building. The remaining funds will be allocated, based on need, to family properties.

# Lease and Occupancy

In accordance with the renewed emphasis on property management, the following changes in lease and occupancy policies are in various stages of development. Many changes are found in the CHA's revised A&O, included as an attachment to the Annual Plan.

**Lease enforcement**

The CHA plans administrative changes to support strong and consistent lease enforcement efforts by professional property managers and RMCs.

**Applicant screening**

Improved lease enforcement must be coupled with tougher screening procedures to insure that public housing communities are safe and desirable places to live. The CHA will require the professional property managers and RMCs to conduct screening to determine if applicants will make suitable residents. The CHA will not place applicants on the waiting list who do not meet recently established eligibility criteria dealing with the illegal use of drugs and other criminal activity. In accordance with the A & O Policy, all applicants will be subject to uniform screening procedures administered at the site level, often assisted by resident advisory groups, established jointly by CHA and the CAC/LAC. The procedures will assess the applicant's ability to:

- pay rent and other charges on time in accordance with the lease.
- care for and avoid damaging the unit and common areas.
- use facilities and equipment in a reasonable way, create no health or safety hazards and to report maintenance needs.
- respect the right to peaceful enjoyment of others and to avoid damaging the property of others.
- refrain from <u>any</u> activity, including drug-related or other criminal activity, that threatens the health, safety or right to peaceful enjoyment of other residents or staff.
- comply with necessary and reasonable property rules and health and safety codes.

The above criteria are the essential elements of lease compliance covering the range of resident obligations from rent payment to housekeeping. These criteria will also be applied by the CHA to define lease compliant residents in good standing.

**Fair administration of the screening criteria**

Under the screening procedures, the determination to admit an applicant or make an assessment of good standing for lease compliance will include the following considerations:

- Verifiable evidence of rehabilitation with respect to drug use, drug-related, or other criminal activity.
- Other verifiable evidence of mitigating circumstances presented by an applicant or resident.
- The specific circumstances of the case including seriousness of the offense and extent of participation by family members.
- Resident knowledge that a household member was/is using drugs or engaged in criminal activity.
- Options that permit the CHA and the resident to deal with the family member(s) who are engaged in the unacceptable activity without terminating the lease for the household.

Residents may contest a good standing determination through the Grievance Procedures, and applicants denied admission are entitled to an informal hearing to present evidence of mitigating circumstances.

**Expanding the definition of family**

Many CHA families live in non-traditional households. In order to keep these families together and to foster the caring relationships that both children and adults need, CHA has broadened its definition of family and, for the first time, acknowledges kinship care arrangements. Under kinship care arrangements the primary caregiver in the household need not be a relative or have legal custody or guardianship for children or others living as part of that family.

**Local preferences for new admissions**

In accordance with QHWRA, the A&O Policy provides a preference for a mix of incomes. Fifty percent of all new admissions will be for households with annual incomes of not more than 30 percent of area median and 50 percent will be for families between 31 percent and 80 percent of the area median. The CHA is permitted to skip families on the waiting list to assure that a mix of income is achieved. The income mixing preference and skipping flexibility applies only to new admissions. The policy also includes preferences for upwardly mobile families, defined to include families with an adult member who is working or starting job training, and a preference for victims of domestic violence.

**Site-based waiting lists**

The CHA will take advantage of the changes to waiting list rules in Section 525 of the QHWRA. Subject to review and approval by applicable courts, and in compliance with applicable Fair Housing and 504 disability requirements, CHA will expand site-based waiting lists to all sites and revise the procedures for administering such lists so that all intake activity, including housing offers, can be made at the site. Applicants can place their names on waiting lists for three separate properties. CHA will insure that each applicant has complete information on housing options available in the selection of developments. Further, CHA will monitor the activities of the professional property managers to enforce compliance with applicable Fair Housing and Disability laws. (A Fair Housing Monitoring Plan is included as an attachment to the Annual Plan.)

**Lease and Grievance procedures**

CHA, in consultation with the RAB/CAC, will undertake revisions to the lease and grievance procedures. The lease will be revised to bring the language in line with the A & O policy as well as QHWRA. QHWRA includes new provisions that address public housing residents who fail to comply with Temporary Assistance for Needy Families (TANF) and community service requirements. At the request of the residents and the RAB/CAC, CHA will also revise the grievance procedures to make it more responsive. Both the lease and grievance revisions will be available for separate public comment.

**Accessibility**

The A & O Policy protects the rights of persons with disabilities in the following ways:

- Creates a local preference for admission to accessible housing units for current residents and applicants who need accessible units.
- Offers of housing for all accessible units or adaptable units will first be made to current residents having a disability and who require the accessible features of the vacant unit. In effect, a transfer of the resident with disabilities from a non-adapted unit to the vacant accessible/adapted unit. If there is no current resident in need of the unit, the unit will be offered to an eligible applicant having a disability that requires the accessibility features of the vacant unit.
- If there is no such applicant and the CHA offers the unit to an applicant without a disability, CHA will require the applicant to agree to move to an available non-accessible unit within 30 days when either a current resident or an applicant needs the features the unit provides. This requirement will be reflected in the lease agreement signed with the applicant.
- When there is a mismatch between a unit's accessible features and the accessible features needed by the applicant, or if an accessible unit is offered to a family not requiring the features of that unit, the refusal of the unit will be considered a good cause for refusal, and the applicant will not lose their place on the waiting list(s).
- Includes a timetable for accessibility repairs. CHA will make units accessible per the timetable.

**Rent Structure**

In accordance with QHWRA, residents will pay the lower of an income-based rent or a unit-based rent. An income-based rent has been the standard in public and assisted housing for many years. Ceiling rents are unit-based rents and have been used for some time by public housing agencies to cap rents and thereby retain working families. Ceiling rents are typically related to operating costs. QHWRA expands the unit based rent options by adding a new category of rent called a “flat rent”. The flat rent is tied to market factors. For a detailed description of rent structure, see the discussion in the Annual Plan.

# Human Capital Development

Far from its original purpose as transitional housing for the working poor, public housing developments in Chicago has become permanent communities of extreme poverty. While CHA's primary focus is the rehabilitation, redevelopment, and management of housing that is safe and affordable, the CHA must also consider the human capital needs of its residents.

In the past, the CHA often undertook the responsibility for direct service delivery. Although the intent was to ensure the availability of services, the result was frequently a duplication of services that further isolated and segregated residents. The Agency also did a poor job of monitoring the quality of these programs, which became fragmented and ineffective.

The Plan outlines a new approach, one where CHA reduces its direct role in service delivery but instead concentrates it resources to facilitate residents' access to services in the community. The main strategy of this new model is the establishment of development-based community workers -- "service connectors" -- who will assist residents in identifying and accessing services that already exist or are provided in close collaboration with other public and private agencies. Additional efforts in the area of human capital development include: support for active resident participation and leadership, tenant patrols, senior programs, treatment services, and aggressive fundraising.

**Service Connectors**

The CHA will commit approximately $7.1 million annually to establish service connectors at each property.

Service Connectors may be community residents who are sensitive to and experienced with public housing needs and other human service issues: environmental health risks, substance abuse, special needs for the elderly and/or disabled, public safety, etc. They will be drawn from the community, and receive training as paraprofessionals in the areas of assessment and referral, resource identification, interagency coordination, and systems advocacy and navigation.

The Office of Programs will work to assure that existing programs are available to residents, including: the University of CHA (a summer school and after-school program that improves academic outcomes for at-risk youth through tutoring and team building), early childhood interventions (provided in the home or at quality childcare centers), after-school activities (midnight basketball and tutoring), the summer food program, and career development activities (role model workshops and internships).

**Collaborative Fundraising**

Currently, the Agency receives about $9 million annually in outside funding for various resident services programs. The goal is to increase this amount to $50 million in five years. Towards that end, a dedicated unit has been created within CHA's Finance Department to develop collaborative fundraising strategies with

partners in service delivery. Areas of particular focus include: training and employment services, economic development, education (youth, adult, and senior), preventative health services for all ages, security (improvements to building security systems, funding for tenant patrols or other community policing initiatives, etc.), and other support services.

**Senior Programs**

Working with the City's Department on Aging, the CHA will help to provide an array of services for the more than 9,000 senior citizens living in CHA housing, including resource and referral services, Victims Assistance, health screening, education, concerts and other enrichment activities. Service connectors will also be established for senior buildings.

**Tenant Patrols**

Families and seniors in public housing face gang violence and high crime rates that threaten their daily activities. The CHA Tenant Patrol is a group of concerned residents coming together to help create a stable and secure environment for families. The Agency will continue to fund this initiative at about $2 million annually; however, the responsibility for coordinating the tenant patrols will be transferred to the private managers. The Tenant Patrols will work in collaboration with the comprehensive community policing and security strategies developed for each housing development.

**Resident Leadership**

The Central Advisory Council (CAC) and the Senior Housing Advisory Council (SHAC) are the duly organized and constituted organizations representing the tenant interests for all of CHA's housing developments. These councils act on behalf of the residents in matters concerning their welfare. The CAC and SHAC provide invaluable input to CHA planning, policies and procedures. The Agency will continue to fund activities under the CAC/LACs at approximately $1.4 million annually.

**Treatment Services**

Although the emphasis will be in assisting residents to access services in the community, the Agency will make available $2.0 million for each of the next two years under the Drug Elimination Grant for drug treatment services. These funds will be used to purchase services in existing drug treatment facilities to accommodate the needs of residents. While this represents a small percentage of the overall need, these funds will help the Agency to address critical and urgent needs. It is anticipated that fundraising efforts will assure at least an equivalent level of service in out years.

# Protective Services

The Plan introduces a major change in the philosophy of policing and also shifts the responsibility for security services to the property level.

- **Security guard services**. The Agency will fund security guard service at approximately $5 million annually. This will provide at least 10-hours of coverage daily at each senior building. It will also provide resources for security guard service at various family buildings slated for demolition. The procurement and oversight of this guard service, however, will be transferred to the third party managers, as opposed to centralized Agency staff. These funds are in addition to the base budgets ($300 PUM average) to each property.

- **Law enforcement**. The Agency recently transferred CHA policing functions to the Chicago Police Department. This change recognizes that all city residents, including CHA residents, deserve the same high quality of police protection. The City will provide these services with the help of a U.S. Department of Justice Community Oriented Police (C.O.P.S.) grant that allows the hiring of 375 new police officers. Coupled with the amount the Agency will pay the City over the life of grant, the Public Housing Section of the Chicago Police Department will be increased to provide a staff of over 500 sworn personnel dedicated solely to public housing.

  A combination of vertical patrols, foot patrols and Chicago's Alternative Policing Strategy (C.A.P.S.) will be used to reclaim, revitalize, and maintain the community. During the reclamation phase, problems will be identified, plans will be developed and intensive law enforcement efforts will be employed. Revitalization will be achieved through zero tolerance enforcement, organization of the community through partnerships, and greater efforts to provide services to the community. Once stability has been achieved, the maintenance phase can begin. Enforcement can be scaled back to customary police coverage levels and partnerships and joint strategies with the community will be maintained to sustain a safe, healthy, and productive living environment.

  Through the use of one Police Department, a team concept can be realized through a unified police presence and visibility, an increased number of officers for the buildings, coordinated community policing efforts, the assistance of district patrols, and the support of City services. As properties are redeveloped, as victimization levels are reduced. As gallery-style high rises are demolished, the need for specialized policing services will also be greatly reduced.

  Overall Agency resources for policing services are estimated to be $63 million over the next five years. This is less than half of what the Agency has been spending in recent years and yet the actual number of officers assigned to CHA properties will significantly increase.

- **Site-based security plans**. In conjunction with the preparation of the annual budget and management Plan for the property, each private manager and RMC will provide a security Plan for the property, addressing items ranging from physical improvement to tenant patrols. This Plan will be developed in consultation with residents.

- **Monitoring and Oversight**. CHA, in consultation with the RAB/CAC and the Chicago Police Department, will establish a monitoring system to ensure the provision of police and security services at each development (CAPS model).

# Section 8 Rental Assistance

The CHA administers approximately 27,000 vouchers under the Section 8 program. The Section 8 Program provides housing subsidies to owners of private dwellings who lease units (houses or apartments) to eligible households. The Program was created by Congress in 1974 and has become the single largest federal housing assistance program for low-income families. With Section 8, the Agency is able to offer a range of housing options (i.e., project-based and tenant-based assistance).

Under the Section 8 Program, eligible tenants pay about 30% of their adjusted income for rent and utilities. The Housing Authority pays to the property owner a Housing Assistance Payment (HAP) equal to the difference between the tenant payment and the fair market rent for the unit, which is established according to program rules.

After years of agency mismanagement, the Section 8 program was transferred to private management in 1996 and, since that time, administration of the program has improved tremendously. Except for units reserved for court-ordered efforts, the program is fully leased.

The main activities and initiatives proposed under the Section 8 rental assistance program in the years ahead include:

**Merger of vouchers and certificates**

QHWRA merges and consolidates the Section 8 certificate and voucher programs into one housing choice voucher program. This merger should make the program simpler and more attractive to both voucher holders and landlords. The merger will require a rewrite of the Section 8 Administrative Plan, the primary policy document for the Section 8 program. Significant changes will include:

- Admissions targeting (at least 75 percent of all admissions must be families with incomes below 30 percent of median income).
- The establishment of local preferences, which could include, but not be limited to, working families and persons with disabilities.
- A new model lease, including owner obligations with respect to lease enforcement.
- Extension of the period a family may hold the voucher while searching for a unit beyond the current 120 day limit (this change will assist families relocating out of public housing units).

The revised Administrative Plan for the Section 8 program will be subject to a separate comment period.

**Screening policy**

The merger rule permits eligibility and suitability screening of Section 8 applicants by the CHA. The CHA will conduct a screening for lease compliance prior to referral to the Section 8 program. (CHAC, CHA's Section 8 contractor, will continue to screen for criminal activity and other issues.) However, the owner of the property still has a final responsibility for screening any family intending to lease a unit.

**Contract Monitoring**

Similar to the changes to be implemented in the property management area, the Agency will enhance its contract monitoring by implementing the following activities:

**Reporting Requirements**

The CHA will revise and expand program reporting from CHAC, the Agency's Section 8 contractor. In particular, the Agency will closely monitor relocation and inspection activity. Reports will track the success rate of relocated families versus the families from the general waiting list and general market absorption trends. The Agency will also track the number of days to perform key Section 8 processing functions, such as the period between request for lease approval and inspection or the period between execution of contract and first landlord payment.

**Quality Assurance**

The CHA will establish a formal protocol for conducting its own quality assurance audits. CHA will review, on its own or by contract, the documents essential to Section 8 program operations. Quality assurance will focus on the following areas: rent calculations, required verifications, rejection of families for the program, maintenance of the waiting lists, adequacy of the briefing, sampling of unit inspections (including re-inspections to make sure the units meet Housing Quality Standards (HQS)), adequacy of rent reasonableness determinations, timely payment of the housing assistance payments (HAP), effectiveness of CHAC's mobility counseling program for second moves, whether landlords are meeting their responsibilities under the program, and other areas as specified in the contract with the vendor.

The CHA will improve its monitoring of compliance with Section 504 and fair housing laws. The CHA also intends to establish a testing protocol to identify and address fair housing compliance in the market place. The CHA may contract with a third party to perform this service.

**Performance standards and incentives**

The CHA will soon be entering into negotiations to extend the current contract to operate the Agency's Section 8 program. The new contract will include new performance standards and incentives.

**Mobility Counseling**

As of November 1999, 37.2 percent of all Section 8 households with children live in low-poverty areas (defined as a census tract where not more than 23.9 percent of the households are poor). In 1998, HUD authorized the conversion of 250 vouchers to provide $2.5 million in funding (to be used over two years) for special mobility counseling services to encourage moves to low-poverty areas. The Agency will request an extension of this program when this initial allocation of funds

expires. The Agency has found that "second move" mobility counseling can be particularly effective. These services will be provided directly through CHAC or through third-party contractors.

**Use of administrative fees to continue and expand service connection efforts**

The Agency is paid a fixed administrative fee to administer each Section 8 unit. The fee savings that the Agency obtains through its private management contract will be used to expand service connection efforts for Section 8 recipients.

**Landlord outreach**

To expand the number of landlords participating in the program and improve the image of the program and the receptiveness of neighbors, CHA will:

- Work with organizations representing residents, landlords and neighbors, community institutions such as churches and service organizations, elected officials and others to communicate more clearly and effectively about the housing choice voucher program, including the rights and responsibilities of tenants and landlords, the terms of the housing assistance contract, and the process by which leasing is accomplished.
- Promote incentives for landlords across the region to participate in the program, including potential tax abatements and other measures.
- Screen potential recipients of Section 8 vouchers for criminal history and lease compliance, prior to beginning their apartment search. While landlords will still have the ultimate responsibility for tenant screening, CHA will provide this baseline service as part of its commitment that residents referred to the Section 8 program will be ready for the private market.
- Work with organizations representing landlords and property managers to continue to address issues with program functions and processing times.

**Exception rents and changes to the payment standard**

The Agency has received approval of "exception" rents for 15 high-rent sub-markets in the City of Chicago. The Agency will continue to examine areas where exception rents are required for effective program operation. The CHA will use the information provided in HUD's annual market study, along with other data, to assess the need for exception rents within a community area.

**Inspections**

The focus will be on maintaining a strong Housing Quality Standards Inspection Program but also expediting inspection turnaround times.

**Lead poisoning prevention**

The CHA will create financial assistance to assist Section 8 landlords in creating lead-safe housing. The CHA will create a strategy to ensure that Section 8 housing is comparable in environmental safety to CHA owned property, especially in units where pre-school age children reside.

**Accessibility**

The CHA will make a special effort to identify accessible units for the Section 8 program in the City of Chicago and will provide a database of referrals for families who require units with these features.

In order to increase accessibility options under the Section 8 Program to persons with disabilities, CHA will:

- Continue to aggressively apply for additional funding to increase the number of Section 8 certificates for persons with disabilities.
- Recruit landlords with accessible units.
- Establish an "Access Improvement Fund" of $300,000 annually that will be used to make modest investments (around $1,000 per unit) to aid with accessibility.
- Request exception rents, where appropriate, to cover the cost of accessibility improvements made by landlords.

**Services and Section 8**

| **Section 8 Family** | **Potential Assistance** |
|---|---|
| Relocatee from public housing | · Pre-move counseling including housekeeping and budgeting.<br>· Moving and relocating assistance including security deposit payments, utility connection fees, and payment of moving cost.<br>· Mobility counseling including assistance in finding a unit, neighborhood choice options, and visits to possible opportunity areas.<br>· Connection counselors to keep in contact with the family and make referrals in areas such as child-care, education, and job training. |
| Waiting List Families that receive a Voucher | · Connection counselors to keep in contact with the family and make referrals in areas such as child-care, education, and job training.<br>· Mobility counseling including assistance in finding a unit, neighborhood choice options, and visits to possible opportunity areas (subject to funding availability). |

| | |
|---|---|
| Section 8 Families Making 2nd Moves | · Mobility counseling including assistance in finding a unit, neighborhood choice options, and visits to possible opportunity areas.<br><br>· Connection counselors to keep in contact with the family and make referrals in areas such as child-care, education, and job training. |

# Section 3 and MBE/WBE Goals

The Plan provides a major opportunity to support small and disadvantaged businesses and to promote employment opportunities (in construction, management, and services) for residents and other low income individuals. CHA is committed to providing that opportunity through carefully targeted Section 3 and Minority-Owned Business Enterprise/Women Owned Business Enterprise (MBE/WBE) programs.

**Section 3 and Apprenticeship**

Section 3 of the Housing Act of 1968 requires that 30 percent of new hires to be public housing residents or other low income persons from the community or the City. Under Section 3, contractors must look first to the residents of the development for hiring. To foster this goal, CHA will work with a special task force of the CAC and the Mayor's Office of Workforce Development to craft a hiring and referral program. The program will balance the desire for residents from each development to work on the construction projects in their own development with the need for apprentices to gain sufficient experience to achieve their union cards. CHA is also exploring the potential for collaborating with private and other public agencies to provide specialized education and training for residents willing and ready to work. CHA will also seek to refer residents to contractors and projects funded by other public agencies and private organizations. In support of this goal, CHA has proposed a goal that $20 million of its construction contracting wages under the Capital Program be the wages of CHA residents in union apprenticeship programs.

**Minority Business Enterprise and Women Business Enterprise**

The Agency's goals for MBE/WBE participation are as follows:

For construction contracts:

- 25% of the contract amount for contracts under $200,000
- 30% for contracts between $200-500,000
- 35% for contracts between $500,000 and $1 million
- 40% for contracts over $1 million

For materials, supplies and services:

- 20% of the contract amount (regardless of contract size).

In addition to the above, the Agency will encourage mentorship relationships with smaller MBE/WBE firms that can contribute bona fide commercial value to the overall project, including in particular resident owned businesses. CHA will work with organizations serving the minority business community to develop a strategy for promoting such relationships, and for communicating the benefits to potential mentor firms as well as to qualified MBE/WBEs throughout the City.

# Consolidated Budget

The CHA's total budget for its Section 8 and public housing programs is approximately $637 million annually.[4]

Exhibits 4 and 5 show the sources and uses of funds over the next five years for the Section 8 and public housing programs, respectively. For illustration purposes, the amounts shown (revenues and expenses) are not adjusted for inflation or for changes in unit counts. They assume the same level of funding as projected to be received in FY 2000. Although the number of future public housing units will decrease and the number of future Section 8 units will increase, the pace at which this will occur will not be fully known until completion of the redevelopment planning processes. While these events will affect the composition of Agency funding (i.e., public housing funds will be reduced as Section 8 funding is increased), the purpose of these two exhibits is to convey the Agency's broader approach to spending.

**Exhibit 4 – Section 8**

The total budget for Section 8 is approximately $212 million annually. Of this amount, $191.3 million represents Housing Assistance Payments to landlords; $19.5 million represents fees earned to administer the program; $0.4 million represents interest income from reserves, and $0.7 million represents funds provided to the Agency for special mobility counseling services. Although mobility counseling funds expire in FY 2000, the Agency has requested that this program be extended. Of the $19.9 million in combined administrative fees and interest income, approximately $17.0 million is paid to CHAC to administer the Section 8 program. The balance, which represents the savings generated as a result of private management, will be used for three purposes: (1) Agency monitoring of the Section 8 contract ($900,000); a new "access improvement" fund to assist landlords make small capital improvements for persons with disabilities ($300,000); and (3) service connectors for Section 8 residents ($1.7 million in FY 2000 and $2.5 million thereafter).

**Exhibit 5 – Public Housing**

The total budget for public housing, inclusive of operating, capital, and Drug Elimination Grants, is approximately $426 million annually. Expenses are grouped according to the major themes of this Plan:

- **Administrative Overhead**

  Total overhead costs (i.e., indirect costs) are projected at $33.5 million in FY 2000 and approximately $22.0 million in FY 2001-2004, after transitioning to total third-party management. Some centralized functions are transferred entirely to the private managers and RMCs (rent collections, evictions, work order intake, administration of security guard contracts, etc.), others are completely eliminated (central warehouse), and still others are significantly reduced (for example, with fewer overall employees, the Agency needs fewer Personnel staff). Unfortunately, comparisons of overhead costs from previous years cannot be provided since these costs were not separately tracked.

[4] These figures also include approximately $8.3 million in FY2000 for the "City-State" program, representing 900 units of agency-owned project-based Section 8.

- **Property Management**

  Funding for property management is projected at approximately $149 million annually. This includes both the operating budgets assigned to each site as well as oversight and monitoring. The figures in FY 2000 include Agency management for some properties through June 2000. The amounts presume a minimum of $300 PUM in non-utility costs for all properties under private management and RMCs, exclusive of deprogrammed units, which will receive approximately $192 PUM. These amounts include $40 PUM (approximately $18.0 million) for extraordinary maintenance.

- **Utilities**

  Costs are projected at $55 million annually.

- **Resident Services**

  The budget includes a base commitment from Agency funds for four core programs: CAC/SHAC, Service Connectors, Family Investment Center, and Tenant Patrols, amounting to $11.5 million annually. In addition, the Agency will fund $2.0 million in each of the first two years for drug treatment services, with the expectation that fundraising efforts will be successful in maintaining these services in out years. Presently, the Agency receives $8.8 million annually in outside grants to support resident programs. Through targeted outreach and fundraising, the Agency expects to increase outside grants to $50 million annually by FY 2004.

- **Safety and Security**

  Police services are projected at $15.0 million in FY 2000 and $12.0 million in FY 2001-2004. The budget also includes $5.0 million annually for security guard service, which includes at least 10 hours of coverage daily at all senior buildings. Funding for the United States Department of Justice grant for Community Policing is not shown here because it will be administered directly by the City.

- **Capital**

  The Agency is projecting to receive $148 million annually under the public housing Capital Fund. Of this amount, $18 million will be used for capital maintenance (shown under Property Management), $8.6 million for Architectural and Engineering Services, $5.2 million annually for Project Management (both redevelopment and construction management staff)[5], and $11.1 million in contingency. The balance, or $109.1 million in FY 2000 and $105.1 million in FY 2001-2004, will be used for building improvements. No funds are budgeted for non-capital uses.

This Plan represents the first time that the Agency has presented a unified, five-year budget.

[5] The amount for FY 2000 is only $1.2 million since construction management salaries were already budgeted from the FY 99 grant.

**Exhibit 4**

## Section 8 Programs
**FY2000-FY2004**

| Section 8 | 2000 | 2001 | 2002 | 2003 | 2004 | Totals |
|---|---|---|---|---|---|---|
| **Revenues:** | | | | | | |
| Administrative Fees | $19.5 | $19.5 | $19.5 | $19.5 | $19.5 | $97.5 |
| HAP Payments | 191.3 | 191.3 | 191.3 | 191.3 | 191.3 | 956.5 |
| Mobility Counseling Fund | 0.7 | 0.0 | 0.0 | 0.0 | 0.0 | 0.7 |
| Interest Income | 0.4 | 0.4 | 0.4 | 0.4 | 0.4 | 2.0 |
| Total | $211.9 | $211.2 | $211.2 | $211.2 | $211.2 | $1,056.7 |
| **Expenses:** | | | | | | |
| CHAC | $ 17.0 | $ 17.0 | $ 17.0 | $ 17.0 | $ 17.0 | $ 85.0 |
| Monitoring | 0.9 | 0.9 | 0.9 | 0.9 | 0.9 | 4.5 |
| Service Connectors | 1.7 | 1.7 | 1.7 | 1.7 | 1.7 | 8.5 |
| Mobility Counseling | 0.7 | 0.0 | 0.0 | 0.0 | 0.0 | 0.7 |
| Access Improvement Fund | 0.3 | 0.3 | 0.3 | 0.3 | 0.3 | 1.5 |
| HAP Payments | 191.3 | 191.3 | 191.3 | 191.3 | 191.3 | 956.5 |
| Total | $ 211.9 | $ 211.2 | $ 211.2 | $ 211.2 | $ 211.2 | $ 1,056.7 |
| **Surplus/Deficit** | $0.0 | $0.0 | $0.0 | $0.0 | $0.0 | 0.00 |

**Exhibit 5**

**Chicago Housing Authority**
**Public Housing Programs**
**FY2000-FY2004**

| | 2000 | 2001 | 2002 | 2003 | 2004 | Totals |
|---|---|---|---|---|---|---|
| **Revenue** | | | | | | |
| Rents | $39.5 | $39.5 | $39.5 | $39.5 | $39.5 | $197.5 |
| Miscellaneous Income | 1.1 | 1.1 | 1.1 | 1.1 | 1.1 | 5.5 |
| Operating Subsidy | 183.4 | 183.4 | 183.4 | 183.4 | 183.4 | 917.0 |
| Drug Elimination Grant | 10.5 | 8.3 | 8.3 | 8.3 | 8.3 | 43.7 |
| City/State Revenue | 8.3 | 6.7 | 6.7 | 6.7 | 6.7 | 35.1 |
| Capital Grant | 146.2 | 148.0 | 148.0 | 148.0 | 148.0 | 738.2 |
| Reserve | 17.0 | 0.0 | 0.0 | 0.0 | 0.0 | 17.0 |
| Overhead Budgeted from CGP 99 | 10.7 | 0.0 | 0.0 | 0.0 | 0.0 | 10.7 |
| Other Grants | 8.8 | 20.0 | 30.0 | 40.0 | 50.0 | 148.8 |
| Total Revenue | $425.5 | $407.0 | $417.0 | $427.0 | $437.0 | $2,113.5 |
| **Administrative/Overhead** | | | | | | |
| Executive Office | $8.6 | $8.6 | $8.6 | $8.6 | $8.6 | $43.0 |
| Finance & Administration | 9.7 | 5.0 | 5.0 | 5.0 | 5.0 | 29.7 |
| General Expense | 9.1 | 5.0 | 5.0 | 5.0 | 5.0 | 29.1 |
| Terminal Leave | 0.5 | 0.0 | 0.0 | 0.0 | 0.0 | 0.5 |
| Employee Benefits | 5.6 | 3.0 | 3.1 | 3.2 | 3.3 | 18.2 |
| Subtotal | $33.5 | $21.6 | $21.7 | $21.8 | $21.9 | $120.4 |
| **Property Management:** | | | | | | |
| Routine | $122.1 | $126.1 | $128.7 | $128.6 | $128.5 | $634.0 |
| Extraordinary Maint. (Capital Fund) | 18.0 | 18.0 | 18.0 | 18.0 | 18.0 | $90.0 |
| Terminal Leave | 3.8 | 0.0 | 0.0 | 0.0 | 0.0 | 3.8 |
| Employee Benefits | 9.5 | 2.3 | 2.3 | 2.3 | 2.3 | 18.7 |
| Subtotal | $153.4 | $146.4 | $149.0 | $148.9 | $148.8 | $746.5 |
| **Utilities** | $55.0 | $55.0 | $55.0 | $55.0 | $55.0 | $275.00 |
| **Resident Services:** | | | | | | |
| CAC/SHAC | $1.4 | $1.4 | $1.4 | $1.4 | $1.4 | $7.0 |
| Service Connectors | 7.1 | 7.1 | 7.1 | 7.1 | 7.1 | 35.5 |
| Family Investment Center | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 5.0 |
| Tenant Patrols | 2.0 | 2.0 | 2.0 | 2.0 | 2.0 | 10.0 |
| Drug Treatment | 2.0 | 2.0 | 0.0 | 0.0 | 0.0 | 4.0 |
| Admin/Other | 6.6 | 1.5 | 0.8 | 0.8 | 0.8 | 10.5 |
| Other Grants | 8.1 | 20.0 | 30.0 | 40.0 | 50.0 | 148.1 |
| Terminal Leave | 0.3 | 0.0 | 0.0 | 0.0 | 0.0 | 0.3 |

| | 2000 | 2001 | 2002 | 2003 | 2004 | Totals |
|---|---|---|---|---|---|---|
| **Safety & Security** | | | | | | |
| Police | $15.0 | $12.0 | $12.0 | $12.0 | $12.0 | $63.0 |
| Security | 5.0 | 5.0 | 5.0 | 5.0 | 5.0 | 25.0 |
| Terminal Leave | 0.7 | 0.0 | 0.0 | 0.0 | 0.0 | 0.7 |
| Employee Benefits | 0.1 | 0.0 | 0.0 | 0.0 | 0.0 | 0.1 |
| Subtotal | $20.8 | $17.0 | $17.0 | $17.0 | $17.0 | $88.8 |
| **Capital:** | | | | | | |
| A & E | $8.6 | $8.6 | $8.6 | $8.6 | $8.6 | 43.0 |
| Project Management | 1.2 | 5.2 | 5.2 | 5.2 | 5.2 | 22.0 |
| Building Improvements | 109.1 | 105.1 | 105.1 | 105.1 | 105.1 | 529.5 |
| Contingency | 11.1 | 11.1 | 11.1 | 11.1 | 11.1 | 55.5 |
| Total | $130.0 | $130.0 | $130.0 | $130.0 | $130.0 | $650.0 |
| Total Expenses | $425.5 | $407.0 | $417.0 | $427.0 | $437.0 | $2,113.5 |
| Surplus/Deficit | $0.0 | $0.0 | $0.0 | $0.0 | $0.0 | $0.0 |

| | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Employee Benefits** | 4.4 | 2.0 | 2.0 | 2.0 | 2.0 | 12.4 | | | | | | | | |
| **Subtotal** | $32.9 | $37.0 | $44.3 | $54.3 | $64.3 | $232.8 | | | | | | | | |

# Timeframes and Performance Standards

Exhibit 6 includes timeframes for each of the major initiatives presented in this Plan. Most of the management changes will occur in the first six months of this Plan.

In its list of waivers and requests to HUD, the CHA has asked that its Public Housing Assessment System (PHAS) score for five years will be waived. In lieu of PHAS, the Agency will prepare annual plans and year-end reports which will include performance standards. Although PHAS will be waived, the Agency will continue to have its units undergo the independent physical inspection and independent resident survey. The results of these inspections and surveys will be advisory only.

In order to allow the public to track CHA's progress under this Plan, CHA will publish a quarterly progress report. The report will outline CHA's achievements on key initiatives and performance measurements agreed upon by HUD and CHA.

**6. TIMEFRAMES FOR MAJOR INITIATIVES**

| | | DESCRIPTION | START | END |
|---|---|---|---|---|
| **Capital Plan** | Demolition | The agency will apply for demolition of all high rise buildings that are currently vacant in early 2000. Assuming expeditious HUD review and approval, these buildings will be demolished in the latter part of 2000. All other demolitions will be dictated by approved redevelopment plans. | 2/1/00 | 12/2/00 |
| | Renovation of Senior Properties | The first renovations will begin in the third quarter of 2000 and will continue through the third quarter of 2002. | 7/1/00 | 9/30/02 |
| | Renovation of Scattered Site Properties | The first renovations will begin in the third quarter of 2000 and will continue through the third quarter of 2002. | 7/2/00 | 9/30/02 |
| | Development of Redevelopment Selection Criteria | The Working Group to establish criteria by February, 2000. | | 3/1/00 |
| | Renovation/Redevelopment of Non-202 Family Properties | CHA will issue request for qualifications from development teams in March 2000, with awards by May 2001. Renovation/redevelopment will take three years (through 2004) | 3/1/00 | 12/31/04 |
| | 504 Self Evaluation and Transition Plan | CHA will procure services for the 504 self evaluation and transition plan and complete the process by July 2000. | 2/1/00 | 7/1/00 |
| | Renovation/Redevelopment of Section 202 Properties | The Agency will issue request for qualifications from development teams in March 2000, with awards by May 2001. For those proposals selected for award, redevelopment will take four years (through 2005). | 3/1/00 | 12/31/05 |
| **Property Management** | Private Management | All properties to be placed under private management on or about June 1, 2000. | 12/1/99 | 6/1/00 |
| | Development and Assignment of Property-based Budgets | New budgets to be assigned as properties are transferred or re-bid to private managers (on or about June 1, 2000). | 1/1/00 | 6/1/00 |
| | 504 Training | The Agency will provide 504 and Fair Housing training to Agency staff. | 2/2/00 | 6/1/00 |
| | Implementation of New Management Contract with Private Managers | To be implemented with new contract awards (on or about June 1, 2000). | 2/1/00 | 6/1/00 |
| | Development of New Contract Monitoring System for Property Management | To be implemented with new private management contracts (no later than June 1, 2000). | 2/1/00 | 6/1/00 |
| **Lease and Occupancy** | Admissions and Occupancy Policy | A new A& O policy has been completed will be implemented the first quarter of 2000. | 1/1/00 | 3/1/00 |
| **Human Capital Development** | Service Connectors | The Agency will start establishing “service connectors” offices in the first quarter of 2000 and have the remainder completed by third quarter 2000. | 1/1/00 | 9/30/00 |
| **Protective Services** | Transfer of Police Functions | Completed | | |
| **Section 8** | Section 8 Administrative Plan | A new Administrative Plan for Section 8 will be completed in the first quarter of 2000. | 12/1/99 | 3/31/00 |

# Commitments, Waivers, and Requests

Chicago Housing Authority

January 6, 2000

# COMMITMENTS, WAIVERS, AND REQUESTS

On May 27, 1999, the City and HUD entered into a Memorandum of Understanding (MOU) that outlined the mutual understandings and expectations regarding the transition of the CHA to local control.

As part of the MOU, the CHA would submit to HUD a list of necessary regulatory and legislative waivers, as well as funding commitments, necessary to implement the Agency's plan. Further, subject to any limits to its legislative authority, and subject to the acceptability of the plan, HUD intended to approve an acceptable plan under the Moving to Work (MTW) Demonstration program.[1] These requests, together with the Plan itself, would be incorporated into a new "Performance Contract" and/or MTW Agreement between the CHA and HUD.

Pursuant to the MOU, the following comprises the Agency's list of commitments to various actions, interpretations, funding, and expedited processing necessary to implement the Plan. While the Agency's requests were not to be limited to those authorized under MTW, the Agency believes that all of the items listed below are MTW-eligible.

| ITEM | | COMMENT/DISCUSSION |
|---|---|---|
| **General** | | |
| 1 | Ten-year program commitment | Because of the scale of the undertaking, and because of the required investment, the CHA requests that the funding commitments and program changes granted to the Agency will extend for ten years. |
| 2 | Termination Clause | The Agency requests that any termination of the Agreement be provided through adequate notice and that such action be for cause or failure to perform in accordance with agreed-upon performance measures. |
| 3 | Prospective Adverse Legislation and/or Regulation | In the event of any regulatory or legislative change affecting the terms, conditions or funding under the Agreement, HUD and CHA agree to renegotiate any affected provision. |

[1] Section 204 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996 provides that HUD may select up to 30 housing authorities to design and test innovative methods of providing housing assistance to low-income families. Under MTW, participating agencies must combine assistance under the public housing and Section 8 Existing programs and may be exempted from existing regulations and statutes except those having to do with demolition/disposition, wage rate, and program eligibility requirements. Agencies must serve substantially the same number of households as they would have served had they not participated in MTW.

| | | |
|---|---|---|
| 4 | HUD Liaison | As part of the agreement CHA requests that HUD appoint/select a designated liaison to deal with issues that arise under the Agreement and or with the execution of the transformation plan. |

**Funding Commitments**

| | | |
|---|---|---|
| 5 | Block Grant Funding | The Agency requests that public housing operating subsidies, capital grants, and Section 8 funds be combined into a "block grant" and provided directly to the CHA. Under a block grant, the Agency would have full funding fungibility, meaning that operating funds could be used for capital or rental assistance purposes, the rental assistance funds could be used for operating or capital purposes, and the capital funds could be used for operating or rental assistance purposes. The federal subsidy to the CHA under these programs is currently about $541 million ($183 million for operating subsidies, $148 million in capital grants, and $210 million in Section 8 subsidies).<br><br>The amount of the block grant would be adjusted each year for inflation and for any incremental units of Section 8 awarded to the Agency. The capital portion of the formula would remain fixed for ten years, regardless of any change in the Agency's stock; however, the operating portion of the formula would be renegotiated after five years, based on both the actual number of "hard" units it retains and based on costs to operate comparable multifamily housing in Chicago. By that time, the Agency should have demolished most, if not all, of its obsolete buildings, resulting in lower costs.<br><br>Also under this block grant, the Agency would need to prepare only one unified financial report, covering the combined program.<br><br>Block grant funding would provide the Agency with a number of benefits and incentives. First, it would greatly simplify the financial administration of its programs through the introduction of consolidated financial reporting, funding flexibility, and predictable and simplified funding formulas. Second, it would provide the Agency incentives to close obsolete buildings as quickly as is practical, to seek ways to increase rental and other revenue, and to implement energy performance measures. Under a block grant, the Agency would retain all increased revenues from rents and other sources. |

| | | |
|---|---|---|
| 6 | Relocation and Replacement Vouchers | As provided for in the MOU, the Agency will be provided with Section 8 vouchers for all "hard" units not replaced. However, in the first five years of the Plan, the Agency will only need approximately 6,000 vouchers to handle the relocation of affected families into private market housing. Given the priority of relocating these families, and given possible market absorption issues, the Agency does not expect to use any additional replacement vouchers until after all families are relocated (beginning in about year six). |
| 7 | Demolition Costs | The Agency estimates that the total demolition costs under the Plan to be $85 million, or on the order of $17 million a year over the next five years. The Agency requests that such funds be made available, as needed, either as targeted amounts or set-asides under the HOPE VI demolition fund or from the emergency pool under HUD's capital fund.<br><br>The Section 202 viability requirements result in the demolition of more public housing units in Chicago than any other City in the country. CHA's existing stock, especially the gallery high rises, is in extremely poor condition. The buildings are subject to system failures resulting in the emergency closings/repairs. Treating this type of emergency is costly and highly disruptive to the resident's lives. Such emergencies place families at risk and require the unplanned expenditure of scarce capital dollars, often to stabilize the condition not provide a long-term repair. Use of capital funds to stabilize these properties only depletes funds for long range redevelopment efforts. The closure and demolition of these buildings is in the best interest of residents, the community, the Agency, and HUD. |
| 8 | Relocation and Counseling Services | The Agency is requesting funding for relocation and related counseling services. The Agency estimates that the total cost of relocation and counseling services under the Plan to be on the order of $25 million, from the cost to move elderly households to newly renovated apartments in their same buildings (at less than $500 per move) to families in obsolete high-rises into Section 8 housing (at upwards of $2,500 per household, including the cost of moving, utility hook ups, assistance with security deposits, and associated counseling).<br><br>Compassionate and responsible relocation assistance is essential to ridding Chicago of these obsolete buildings, to the continued success of the Section 8 program, and to furthering fair housing goals. |
| 9 | Forgiveness of Debt for Emergency Repairs | As part of the original HUD takeover, the Agency received $25 million in "emergency" CGP funds for a variety of activities. These funds were provided to the Agency as a loan, to be repaid with future capital funds. The Agency requests that this debt be waived in order to maximize the number of units to be rehabilitated/redeveloped. |

**Development Regulations/HOPE VI**

| | | |
|---|---|---|
| 10 | Clarification of Development Regulations Regarding Mid-Rise Buildings | Federal regulations (24 CFR 941.203(d) and Section 6(a) of the 1937 Housing Act) prohibit the development of new family housing in high-rise buildings. As part of the potential redevelopment of various public housing properties, the Agency may build mid-rises (up to seven stories). The Agency seeks clarification that such development would be permitted. Mid-rise properties, both rental and for sale, are a viable building type in the Chicago market. |
| 11 | Streamlined Demolition/Disposition Processing | The Agency intends to comply with existing regulations regarding the demolition/disposition of public housing, including, resident and public comment. However, once such steps have been completed and the Agency submits is demolition application, the Agency requests streamlined processing of the application so that redevelopment activity can proceed in a timely manner, particularly for those demolitions required under Section 202. |
| 12 | Augment Section 202 Viability Test with Market Viability Program | The Agency has 13 family properties that are subject to the Section 202 viability test, of which eight are gallery style high-rises and five are low- and mid-rise properties. The Agency plans to demolish the gallery high rises. With respect to the low-rise and mid-rise properties that fail Section 202, the Agency believes that many, if not all, can be viable with proper management and investment. As such, the Agency requests that the viability test be augmented with a market-driven redevelopment process. The Agency will make available $429 million for the redevelopment of all 13 properties. Except for the gallery high rises, which must be demolished, the Agency will entertain proposals for how best to redevelop these sites and leverage Agency funds.<br><br>The Agency requests authority to retain any of these mid-rise or low-rise properties that fail the Section 202 cost test if, through this market-driven proposal process, it is clear that there are financially sound redevelopment proposals for rehabilitation that would (1) attract a mix of incomes and (2) would be viable over the long term. If the Agency does not receive feasible proposals, it will convert the properties to vouchers, as required under the statute. |

| | | |
|---|---|---|
| 13 | Use of the capital fund for replacement reserves | Title I, Section 35 of the USHA of 1937, as amended by the QHWRA, allows funds to be used in connection with the operations and management of mixed finance projects including the funding of an operating reserve. This reserve is used to ensure the affordability of public housing units for low and very low-income people in the event that operating subsidies are limited. Often this reserve provides added security to make the investment more attractive to the private market.<br><br>CHA requests an expansion of this authority to use its block grant funds to establish a replacement reserve in such projects. Funds will be used to maintain the public housing units and replace equipment and facilities whose useful life expires during the term of the project. Any capital fund contributions to a replacement reserve would be identified in the mixed finance proposal, subject to HUD review and approval on a transaction-by-transaction basis. Allowing the CHA to contribute funds for replacement as well as operating reserves will give the CHA more options as it participates in mixed-finance projects. |
| 14 | Clarification of Authority to Leverage Funds | In order to accelerate capital improvements, the Agency plans to pledge its assets and future funding streams to obtain public and private financing. It is the Agency's understanding that such activity is permissible under Sections 9 and Section 35 of the United States Housing Act (USHA). The Agency seeks clarification of this understanding. |
| 15 | Use of MTW/capital and operating funds for annuities | CHA requests an expansion of the authority granted under Title I, Section 35 of the USHA of 1937, as amended, to allow operating and/or capital assistance to fund annuities. The annuity fund generates income that can be used to pay for public housing units over the operating period of the project, thereby reducing the up-front per-unit investment required from the operating or capital dollars. The use of annuities would be identified in the proposals for mixed-finance projects, subject to HUD review and approval on a transaction-by-transaction basis. Creation of such annuities enhances Agency options for the financial structure, timing, and level of contributions required to create viable redevelopment proposals. |

**Occupancy**

| | | |
|---|---|---|
| 16 | Rent Policies | The Agency seeks authority to adopt reasonable rent policies that would encourage economic self-sufficiency. Such policies would only be adopted after full public comment, including input from the CAC/LAC, and formal amendment to the Agency's Admission and Occupancy Policy. |

| | | |
|---|---|---|
| 17 | Bi-annual Recertifications | Currently, the CHA is required to conduct annual certifications for all households. For seniors, the Agency requests bi-annual, as opposed to annual, recertification requirements. In intervening years, the rents of these seniors would be increased by the rate of increase in Social Security/SSI, but without the formal recertification process or third-party verification. However, residents who experience decreases in income would be permitted to have their rent recalculated. |
| 18 | Local Lease | The Agency seeks authority to adopt local lease provisions to encourage better community standards, subject to state and local law. Such a lease would not permit no-cause evictions and would retain a grievance process. Any changes to the existing lease would only be adopted after full public comment, including input from the CAC/LAC, and formal amendment to the Agency's Admission and Occupancy Policy. |
| 19 | Designated Housing | The Agency requests authority to designate any or all senior buildings as "senior only." Such designations will not affect existing residents and it is CHA's intent to provide accessible or adaptable units in the redeveloped sites in excess of the 5% required by Section 504. CHA has prepared a designated housing plan and included this document as part of the Annual Plan. [See 24 CFR 945 and QHWRA section 5A (b) (9)] |

**Modernization**

| | | |
|---|---|---|
| 20 | Obligation and Expenditure Rules and Reporting Requirements | Under a block grant, the Agency would no longer be held to separate obligation/expenditure deadlines for the use of capital funds and it would no longer be required to report separately on obligation/expenditure rates. Rather, such information would be reflected in the Agency's annual consolidated financial report. |
| 21 | Allowable Costs | In modernization/development projects, the Agency would be exempt from the HUD Modernization Handbook regarding allowable costs. Rather, the Agency will use allowable costs based on OMB Circular A-87. 24 CFR 968.105 and 968.112. This will allow the Agency undertake redevelopment in keeping with local practice. |

**Procurement**

| | | |
|---|---|---|
| 22 | HUD Review and Approval of the CHA Procurement Policy and Authority to Use Qualification-Based Procurement for Professional Services other than A& E Services | CHA is requesting HUD review and approval of its procurement policy as outlined in 24 CFR Part 85.36. Approval of the Agency's procurement policy eliminates the need for the Agency to obtain prior HUD approval on various contracting matters, provided the Agency's actions are in keeping with the HUD-approved procurement policy. The intent of this provision is to expedite the procurement process and not to relive the Agency of its obligations under Section 3 or MBE/WBE.<br><br>As part of its procurement policy, the Agency is requesting authority to use "qualification-based procurements" for professional services other than A&E services (qualification-based procurement is only authorized by HUD for A&E services). Qualification-based procurement would allow the Agency to better negotiate such services, including legal and property management services, and would be in keeping with local government practices. |

**Section 8**

| | | |
|---|---|---|
| 23 | Ability to Establish Local Leased Housing Program | Consistent with the authority to convert funds to a block grant, the Agency would be allowed to establish its own local leased housing program, whereby it could determine payment standards, property eligibility criteria, damage claims, rent reasonableness, etc. To the extent that any provisions would increase costs, the Agency would fund those costs from its fixed block grant; to the extent that any provisions would reduce costs, the Agency would benefit from those changes and would use those savings for either increasing services or assisting more households. Included in this authority would be the ability to increase payment standards to encourage mobility moves to non-impacted areas. |
| 24 | Project-Based Section 8 | Under current regulations, an Agency may not use more than 15 percent of its vouchers for "project-based" assistance. Under a block grant, the Agency would have unlimited authority to "project-base" housing assistance. |

| | | |
|---|---|---|
| 25 | Inspection Protocols | Current regulations require the Agency to inspect every unit prior to execution of a Housing Assistance Payment contract and each year thereafter. The Agency requests flexibility to develop inspection protocols that would reward high-performing landlords or high-quality buildings. Buildings constructed or rehabilitated over the past five years will be considered "high quality" if the initial inspection pass rate in the building has been at least 80% in the past year. Thereafter, only 10% of the units in the building will be inspected. Once the sample of 10% has been completed, the balance of the units in the building due for an annual inspection will be subject to an owner/tenant certification of unit condition. All "complaint" and "emergency" inspections will continue to be inspected. |
| 26 | Conversion of Vouchers for Expanded Mobility Counseling | The Agency requests authority to convert vouchers annually for five years to pay for expanded mobility counseling within the Section 8 Program and other housing related activities. The counseling services will be provided not just to new voucher holders but to second and subsequent moves to encourage mobility moves and fair housing goals. Other activities would be identified in a manner similar to the administrative fee reserve. CHA could use the funds for approved housing purposes in accordance with state and local laws. |

**Administrative**

| | | |
|---|---|---|
| 27 | Clarification of Authority under Block Grant to Create Endowment Trust for Supportive Services | Presently, only HOPE VI funds can be used to establish endowment trusts for supportive services. The Agency request clarification that such authority would be authorized under a block grant system. |
| 28 | Wage Rate Monitoring | Current regulations require wage rate monitoring for all capital projects of more than $2,500. Such a requirement places undue administrative burdens on the Agency, particularly given the massive scale of deferred maintenance and capital items. For the purposes of wage rate monitoring, the Agency requests authority to conduct random samples of all construction jobs of less than $100,000. |
| 29 | Public Housing Assessment System (PHAS) | CHA requests that PHAS be waived for five years. In lieu of PHAS, the Agency will prepare an Annual Plan and year-end Annual Report. |

# CHICAGO HOUSING AUTHORITY

# ADMISSIONS AND OCCUPANCY POLICY

**Operations Division**

Presented to Board of Commissioners 1/6/00

CHICAGO HOUSING AUTHORITY

# ADMISSIONS AND OCCUPANCY POLICY

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**The following procedures will be provided for reference only:**


**Appendix A:** Restrictions on Housing Assistance to Non-Citizens Procedures

**Appendix B:** CHA Screening Procedures

**Appendix C:** Residential Lease Agreement and Contract

**Appendix D:** Income Disregard Procedures

**Appendix E:** Resident Grievance Procedures

**Appendix F:** Ceiling Rent Procedures

**This policy uses the terms CHA and the property manager. The terms are used interchangeably and are intended to cover all public housing properties owned by CHA, including those managed by others.**

## I. Nondiscrimination and Accessibility

### A. Compliance with Civil Rights Laws

1. It is the policy of the Chicago Housing Authority (CHA) and any entity designated by the CHA to manage a property, to comply with all applicable laws relating to Civil Rights, including:
   a) Title VI of the Civil Rights Act of 1964 **[24 CFR § Part 1]**;
   b) Title VIII of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988)
   **[24 CFR § Part 100]**;
   c) Executive Order 11063, Section 504 of the Rehabilitation Act of 1973 **[24 CFR § Part 8]**;
   d) The Age Discrimination Act of 1975 **[24 CFR § Part 146]**;
   e) Title III of the Americans with Disabilities Act (to the extent that it applies, otherwise Section 504 and the Fair Housing Amendments govern). **[Title III deals with Public Accommodations]**;
   f) Any applicable State laws or local ordinances; and
   g) Any legislation protecting the individual rights of residents, applicants or staff that may subsequently be enacted.

2. The CHA shall not discriminate because of race, color, national origin, sex, religion, familial status, or disability in the leasing, rental, or other disposition of housing or related facilities, including land, that is part of any development or developments under the CHA's jurisdiction. Such developments are covered by a contract for annual contributions under the United States Housing Act of 1937, as amended, or in the use or occupancy thereof in accordance with the annual contributions contract.[1] **[24 CFR § 100.5].**

3. The CHA shall not, on account of race, color, national origin, sex, religion, familial status, or disability:

   a) Deny any family the opportunity to apply for housing, nor deny any qualified applicant the opportunity to lease housing suitable to its needs;
   b) Provide housing which is different from that provided others;[2]
   c) Subject a person to segregation or disparate treatment;

---

1. Under the Housing and Community Development Act of 1992, CHA is permitted to designate occupancy of certain developments for older persons (including elderly people with disabilities).
2. CHA is required to provide persons with disabilities with housing that is appropriate for their needs. This accessible or adaptable housing enables persons with disabilities to participate in the public housing program.

d) Restrict a person's access to any benefit enjoyed by others in connection with the housing program;

e) Treat a person differently in determining eligibility or other requirements for admission[3];

f) Deny a person access to the same level of services[4]; or

g) Deny a person the opportunity to participate in a planning or advisory group that is an integral part of the housing program.

4. The CHA shall not automatically deny admission to a particular group or category of otherwise qualified applicants (E.g., families with children born to unmarried parents, elderly families with pets, or families with members who have eligible immigration status). Each applicant in a particular group or category must be treated on an individual basis in the normal processing routine **[24 CFR § 960.205]**.

5. The CHA will not permit these policies to be subverted for personal or political favors. The CHA will not offer units in an order different from that prescribed by this policy, since doing so violates the policy, federal law and the civil rights of the other families on the waiting list **[24 CFR § 960.204(a)(3)(ii)].**

## B. Office, Facility, and Program Accessibility

1. The CHA offices, facilities and programs used by applicants must be accessible to applicants with disabilities. If offices, facilities and programs are not accessible (and located on accessible routes), some will be made so, subject to the undue financial and administrative burden test. As an alternative, when comparable facilities or programs exist in accessible and non-accessible formats, the CHA may provide accessible transportation to the accessible facility to permit participation in the program **[24 CFR § 8.20 and 8.21]**.

2. An applicant with disabilities who cannot come to the management office or visit the Occupancy Department may request as a reasonable accommodation that CHA or property management staff schedule a visit to the applicant's home or other accessible location to complete the application for housing. CHA will advise applicants of this option by including a statement in the application package.

3. Documents intended for use by applicants and residents will be made available in formats accessible for those who have vision or hearing disabilities. The CHA staff will be sensitive to applicants who have disabilities or limited abilities in reading comprehension. In addition, the CHA will allow the applicant to bring other

---

3. Except that CHA is obliged to offer reasonable accommodations to applicants with disabilities. This will not affect CHA's screening or eligibility standards, but might require CHA to revise its procedures or practices in carrying out these standards.

4. This requirement applies to services provided by the CHA and by delegate agencies that operate on CHA property. Thus, a health screening program offered by the local health department in a CHA community room must be fully accessible to persons with disabilities.

individuals such as family members or friends to assist them during the application process. For applicants or residents who have limited reading skills, staff will read and explain documents that are normally handed out to be read or completed. The CHA or the property manager will work with the Local Advisory Council (LAC) to identify residents who may wish to assist applicants as part of the resident community service requirement **[24 CFR § 8.6]**.

4. At the point of initial contact, the CHA staff will ask all applicants whether they need some form of communication other than plain language paperwork. Alternative forms of communication might include: sign language interpretation, having materials explained orally by staff, either in person or by phone, large-type materials, information on tape, and having someone (friend, relative or advocate) accompany the applicant to receive, interpret and explain housing materials **[24 CFR § 8.6]**.

5. The CHA staff will be trained to provide examples, verbally and in written format, of complicated concepts such as eligibility, rent computation, applicant screening, reasonable accommodations, and lease compliance to enable applicants with learning or cognitive disabilities to understand as much as possible **[24 CFR § 8.6].**

6. At a minimum, the CHA will prepare the following information in clearly written and accessible formats:
   a) Marketing and informational materials;
   b) Information about the application process;
   c) The application form;
   d) All form letters and notices to applicants and residents;
   e) General statement about reasonable accommodation;
   f) Orientation materials for new residents;
   g) The lease and house rules (if any);
   h) Guidance or instructions about care of the housing unit;
   i) Information about opening, updating or closing the waiting list(s); and
   j) All information related to applicant's rights (to informal hearings, etc.)

7. To the extent practical, the CHA will involve residents in the revision of forms and documents. CHA will send draft documents to the Central Advisory Council (CAC) for comment or incorporate residents into working groups for document revision.

## C. Addressing Barriers to Equal Housing Opportunities

1. The CHA will identify and eliminate situations or procedures that create a barrier to equal housing opportunity. In accordance with Section 504, and the Fair Housing Amendments Act of 1988, the CHA will either make modifications to a current unit or relocate a resident with a disability to a unit with accessible features. If there is no accessible unit available, CHA will make structural modifications to its housing and non-housing facilities **[24 CFR §§ 8.21, 8.23, 8.24, and 8.25]**. CHA may also make reasonable accommodations **[24 CFR § 100.204]**, or combinations of structural modifications and reasonable accommodations, to permit persons with disabilities to take full advantage of the housing program.

2. In making reasonable accommodations or structural modifications to **existing housing programs [24 CFR § 8.24]** or in carrying out **Other Alterations [24 CFR § 8.23 (b)]** for otherwise qualified persons with disabilities, the CHA is **not** required to:
   a) Make each of its existing facilities accessible **[24 CFR § 8.24 (a) (1)]**; or make structural alterations when other methods can be demonstrated to achieve the same effect **[24 CFR § 8.24 (b)]**;
   b) Make structural alterations that require the removal or altering of a load-bearing structural member **[24 CFR § 8.32 (c)]**;
   c) Provide an elevator in any multifamily housing project solely for the purpose of locating accessible units above or below the grade level **[24 CFR § 8.26]**;
   d) Take any action that would result in a fundamental alteration in the nature of the program **[24 CFR § 8.24 (a) (2)]**;
   e) Take any action that would result in an undue financial and administrative burden on the CHA **[24 CFR § 8.24 (a) (2)]**. This is not applicable to housing undergoing substantial alterations or new construction; and
   f) When the CHA is making substantial alterations (in developments with 15+ units, where the value of the work exceeds 75% of the replacement cost of the facility) to an existing housing facility **[24 CFR § 8.23]** the CHA is not required to:
      i) Provide an elevator in any multifamily housing project solely for the purpose of locating accessible units above or below the grade level [24 CFR § 8.26];
      ii) Make structural alterations that require the removal or altering of a load-bearing structural member [24 CFR § 8.32 (c)]; and
      iii) Make structural alterations to meet minimum accessibility requirements where it is structurally impracticable. Structural impracticability is defined as:
         - Changes having little likelihood of being accomplished without removing or altering a load-bearing structural member; and/or

- Changes that cost 50% or more of the value of the element of the building or facility involved **[24 CFR §§ 8.32 (c), 40.1 ET SEQ. [The Uniform Federal Accessibility Standards].**

3. It is the CHA's policy that accessibility modifications to units will be made in accordance with the following guidelines:

   a) Applicants – The CHA will complete necessary accessibility modifications to units prior to applicant move-in.

   b) Residents – Modifications under $1,000 will be completed no later than 30 days after property management receives the request.

   c) Residents – Modifications over $1,000 will be completed no later than 60 days after the request is received by property management or in accordance with a construction schedule agreed to in writing by property management and the resident.

   - An accessible unit must be on an accessible route and the family living in the unit must have access to common areas and other facilities associated with the property.
   - When an individual requests modifications to the unit, CHA must also consider whether modifications need to be made to the route leading to the unit, and common areas or other facilities.
   - To the extent practical, modifications to common areas and other facilities will be addressed in accordance with the construction schedule noted in 3. c) above.

4. The CHA commits to updating and revising the 504 Self-Evaluation and Transition Plan; once updated, the plan will be kept and the changes incorporated into the Capital Program Budget.

## D. Providing Information in Languages Other than English

**1.** All forms, written materials and recorded telephonic messages used to communicate with current and prospective residents shall be available in the Spanish language as required by Paragraph 3 of the **Latinos United Consent Decree**. This includes all forms, leases, posters, and notices related to registration, intake, marketing, outreach, certification, re-certification and inspections.

**2.** Wherever possible and whenever dictated by marketing and outreach efforts, the above mentioned materials and messages may be made available in other languages[5].

3. Applicants and residents with low English comprehension may furnish an interpreter to assist in communications with CHA offices or programs. Except for

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5. **24 CFR § 5.502** requires that any notice or document relative to citizen or eligible immigration status, where feasible, be provided to an applicant or resident in a language that is understood by the individual if the individual is not proficient in English.

applicants and residents who speak Spanish, the CHA is not required to pay the costs associated with having a foreign language interpreter **[24 CFR § 8.6].**

## E. Marketing and Informational Materials

1. The CHA or the property manager will conduct outreach activities as needed to maintain an adequate application pool representative of the eligible population in the area. Outreach efforts are determined by the vacancy rate at CHA sites, availability of units through turnover, and waiting list characteristics. The CHA and the property manager will periodically assess these factors in order to determine the need for and scope of any marketing efforts.

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

   a) All marketing materials must comply with Fair Housing Act requirements with respect to wording, logo, size of type, etc. **[24 CFR § 110]**;

   b) Marketing will describe the housing unit's amenities, access to public transportation, the application process, waiting list and preference structure accurately;

   c) Marketing materials will make clear who is eligible: low income individuals, families who may be elderly and or have a disability, and families CHA is seeking because of mixed-income requirements;

   d) Marketing materials will be written in simple, clear language and will use more than strictly English-language print media;

   e) Marketing materials will clearly describe the CHA's responsibility to provide reasonable accommodations for people with disabilities; and

   f) An effort will be made to target all agencies that serve and advocate for potentially qualified applicants (E.g. applicants with disabilities, to ensure that accessible/adaptable units are used by people who can best take advantage of their features; therefore, marketing materials will be widely distributed including, but not limited to the following: TANF agencies, homeless shelters, Social Security offices, currency exchanges, churches and schools.

3. **Latino Marketing and Outreach**: Per Paragraphs 4(c) and 9 of the **Latinos United Consent Decree**, the CHA has opened two site registration offices and engages in a marketing and outreach campaign "to substantially increase Latino participation in all current and future CHA housing programs." These activities will be performed by the CHA or its designees for the duration of the Consent Decree as specified in Paragraph 13 (b).

## II. Eligibility for Admission

### A. Qualification for Admission

1. The CHA will admit only qualified applicants[6]. The CHA's housing will not be housing of last resort because families are required to meet eligibility and suitability criteria as required in this policy.

2. An applicant (individual or family) is qualified by meeting all of the following criteria:

   a) A person with a disability as defined to exclude persons whose sole disability is a drug or alcohol-related disability. (See definition #22 for disability for determining eligibility for public housing);

   b) Is a family as defined in Section XII of this policy **[24 CFR §§ 5.508(a),(b)&(c)]**;

   c) Heads a household in which at least one member declares either citizenship or eligible immigration status. **[24 CFR § 200, and § 5.500 through 5.528]**; See the CHA procedures on *Restrictions on Housing Assistance to Non-Citizens,* (Appendix A);

   d) Has an Annual Income at the time of admission that does not exceed the income limits for occupancy established by the Department of Housing and Urban Development **[24 CFR § 5.405(a)]**; or
   Is a CHA, local, state, or federally licensed professional police officer employed on a full time basis and is admitted for the purpose of increasing security for the residents of the CHA.

      i. Police Officers who are not otherwise income eligible for public housing will be permitted to reside in CHA.

      ii. Police Officers so admitted will pay the higher of ceiling rent or flat rent.

      iii. Such admission will be at the ratio of one police officer for 150 units.

   e) Provides a Social Security number for each family member age 6 years or older, or certifies that a household member does not have a Social Security number **[24 CFR § Part 5]**; and

   f) Meets or exceeds the Applicant Screening Criteria set forth in Section III, Paragraph D of this document, including attending and successfully completing a CHA-approved orientation class **[24 CFR § 960.205]**.

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6. The term "qualified" refers to applicants who are eligible and able to meet the applicant selection standards. This term is taken from **24 CFR § 8.3** "Definition of qualified individual with disabilities."

## B. Ineligibility for Admission and Placement on the Waiting List

1. Unauthorized occupants[7] of CHA households applying for a CHA unit are ineligible for admission and will not be placed on the waiting list. However, CHA is willing to consider adding such occupants to the lease in accordance with section VI. D. (11) of this policy.

2. Persons are ineligible for housing assistance and will not be placed on the waiting list if any of the following are applicable:
   a) The applicant owes any back rent, utilities, damages, or other charges to the CHA under the public housing or Section 8 programs; or owes such amounts to any other Authority;
   b) Any leaseholder who <u>has been evicted</u> from public housing or a Section 8 unit because of drug-related criminal activity; and the eviction occurred within three years of the application date. NOTE: Drug-related criminal activity is defined as "the illegal manufacture, sale, distribution, use, or possession with intent to manufacture, sell, distribute, or use, of a controlled substance…." **[42 USC 1437d (L) (5) & 24 CFR § 966.4 (f) (12) (i) (B) (ii)]**);
   c) The CHA determines any member of an applicant household is illegally using a controlled substance;
   d) The CHA determines that there is reasonable cause to believe that such member's illegal use (or pattern of illegal use) of a controlled substance, or abuse (or pattern of abuse) of alcohol may interfere with the health, safety, or right to peaceful enjoyment of CHA property by residents and employees;
   e) During the three (3) years prior to request for admission, any member of the applicant's household <u>engaged in</u> any drug-related or violent criminal activity which would adversely affect the health, safety, or right to peaceful enjoyment of the premises by other residents, the owner, or employees;
      i. Exceptions to (e) may be made for applicants who have undergone a successful rehabilitation program (see #5. below), or where the circumstances surrounding the activity no longer exist;
      ii. After expiration of the three- (3) year period, the CHA may require the applicant, as a condition of admission, to submit to the CHA evidence sufficient to ensure that the individual has not engaged in any criminal activity during the three (3) year period; or
   f) They are subject to a lifetime registration requirement under a state sex offender registration program.

3. At the time of initial intake, applicants will be asked to verify that the above items do not apply to their application.

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[7] The term "unauthorized occupant" refers to an individual who is not a guest as defined in this policy nor on the lease of the unit in which he or she resides.

4. In making determinations with respect to paragraph 2 above, CHA will use the criteria for verification and assessment of information as described in *the Screening Procedures*. (See Appendix B)

5. **Consideration of Rehabilitation**. This paragraph applies to applicants as described in 2. b, c, d, & e above. The CHA may consider whether the applicant household member in question can demonstrate that:
   a) They have successfully completed a supervised drug or alcohol rehabilitation program and are no longer engaging in illegal use of a controlled substance or abuse of alcohol combined with behavior that would violate the CHA lease;

   b) They have been otherwise rehabilitated successfully and are no longer engaging in illegal use of a controlled substance or abuse of alcohol combined with behavior that would violate the CHA lease; or

   c) They are participating in a supervised drug or alcohol rehabilitation program and are no longer engaging in illegal use of a controlled substance or abuse of alcohol combined with behavior that would violate the CHA lease.

6. In evaluating criminal activity or drug-related criminal activity during the screening process, the CHA will give stronger consideration for admission to applicants with no record of criminal activity or criminal behavior. In the review of an applicant's background, the CHA will consider admission when the applicant's record shows minor or infrequent offenses that when taken together do not indicate the pattern of a repeat offender. The CHA will consider more serious offenses in light of clear and verifiable evidence of improved behavior sustained over a significant period of time (significant meaning at least twelve (12) months). A period of improved behavior while on the waiting list will also be considered by the CHA.

## III. Processing of Applications

The CHA accepts and processes all applications in accordance with applicable HUD Regulations.

### A. Application Process[8]

1. Applications and site information sheets for all CHA properties will be available at all development management offices, Latino Outreach Centers and the Occupancy Department. In addition, applications and site information sheets will be available at the CAC office and the LAC offices. Applications may be picked up at these locations, but must be returned or mailed to the development management office, the Occupancy Department or the Latino Site Offices. All applicants will receive a written letter confirming receipt of their application.
2. **Application Packets** will include the following: a list of the developments and buildings by name, type of housing and address; a list of estimated waiting times for each site (updated quarterly); an explanation of the site-based waiting lists; and Notice of Non-Discrimination and Reasonable Accommodation.
3. **Information Sheets** will be available for all sites. Information sheets will include a brief description of a development or senior building, its amenities, unit sizes, and the surrounding neighborhood.
4. Completed applications will be accepted at all development management offices for family and senior sites, Latino Outreach Centers, and the Occupancy Department. Offers of housing may be made at the Occupancy Department. With HUD approval, the CHA may opt to make offers of housing at the site level.

### B. Preferences

1. Local Preferences
   a) The CHA will give housing assistance preference to single applicants who are elderly, near-elderly, persons with a disability, or displaced over single persons <u>who are not</u> elderly, near-elderly, person with a disability or displaced.
   b) Preference for admission to accessible housing units will be granted to current residents and applicants who need such units.
   c) An income range preference will be granted for the following groups [Title V of H.R. 4194 (Quality Housing and Work Responsibility Act) § 517]:
      (1) Tier I: Within any CHA fiscal year (January to December), not less than **50%** of the families admitted will have incomes between 0% and 30% of Area Median Income; and

8. All CHA documents for public information are written in English and Spanish. Alternative formats and languages are available upon request.

(2) Tier II: Within any CHA fiscal year (January to December), **50%** of the families admitted will have incomes between 31% and 80% of Area Median Income.

d) The income range preferences may be adjusted to accommodate property- specific redevelopment plans. CHA will obtain prior HUD approval where the cumulative effect of such adjustments could impact the agency's ability to meet the annual percentage requirements.

e) In order to achieve the income-mixing requirements, described in paragraph d., CHA will institute as policy the right to skip over a family of lower income to offer housing to a family of higher income and vice-versa. CHA will not leave units vacant to satisfy income-mixing requirements.

2. Ranking Preferences:

Among the local preference applicants described above, ranking preferences shall be granted in the following order:

a) Documented victims of domestic violence;

b) Upward Mobility Families, defined to include those with an adult member who is either verified to be working at least 20 hours per week, attending an educational institution on a full-time basis, or participating in an approved job-training program; and

c) Applicants whose children are verified to be at risk of placement outside the household by the Illinois Department of Children and Family Services (DCFS) because of inadequate food, clothing, shelter or environmental neglect or whose children cannot be returned home because the family cannot provide for the children's subsistence needs.

## C. Waiting List Management

1. The CHA's waiting list is administered according to HUD regulations and applicable court orders. Applicants are placed on a waiting list, by bedroom size, by date and time of application and any applicable preference.
2. The waiting lists will be updated at least once a year by removing the names of those families who are no longer interested, no longer qualify for housing, or cannot be reached by telephone or mail. At the time of initial intake, the CHA will advise families of their responsibility to notify the CHA when their circumstances, mailing address or phone numbers change.
3. Opening and Closing Waiting Lists:

a) The CHA, at its discretion, may restrict application intake, suspend application intake, and close waiting lists in whole or in part. The CHA may elect to: close a waiting list completely; close a list during certain times of the year; or restrict intake by preference (including income in a mixed income property), type of project, by bedroom size, or type of dwelling unit.

b) Decisions about closing the waiting list will be based on the number of applications available for a particular property. Other factors considered include: size or type of unit available, the number of applicants who qualify for a preference, and the ability of the CHA to house an applicant in an appropriate unit within a twelve-month period. The CHA or the property manager will publicly announce any decision to close a waiting list, restrict intake, or re-open a waiting list.

c) During the period when the waiting list is closed, CHA will not maintain a list of individuals who wish to be notified when the waiting list is reopened.

4. Change in Preference Status While on the Waiting List

a) Applicants are responsible for contacting CHA when the family experiences a change in the circumstances that qualifies applicants for a housing preference. Upon such notification, CHA will review the family's preference status and adjust their position on the waiting list accordingly.

b) CHA will inform applicants in writing of how the change in status has affected the family's place on the waiting list.

**D. Applicant Interviews and Verification Documents**

1. Applicant interviews are scheduled as families approach the top of the property's waiting list. In this interview, the following items will be verified to determine qualification for admission into public housing:

a) Family composition and type (Elderly/Disabled/Non-elderly);

b) Family member ages and relationships;

c) Annual Income;

d) Assets and Asset Income;

e) Allowance Information;

f) Preferences;

g) Social Security Numbers of all Family Members;

h) Information Used in Applicant Screening; and

i) Citizenship and Eligible Immigrant Status.

2. The CHA will verify applicant claims by: a written third party verification; phone verifications with the results recorded in the applicant's file with staff signature; or, if no other form of verification is available, applicant certification. Applicants must sign releases, verification consent forms, and otherwise fully cooperate in obtaining or providing the necessary verifications.

3. The CHA will obtain a declaration of citizenship or eligible immigration status from every household member.

4. Applicants reporting zero income must complete a family expense form. With this form, applicants will estimate the money spent on: food, beverages,

transportation, health care, childcare, debts, household items, etc. Also, applicants will be asked about the status of any application or benefits through Temporary Assistance for Needy Families (TANF) or other similar programs ["Zero Income" applicants who are admitted into the CHA must undergo monthly re-certifications of income according to Section 5 of the *Residential Lease Agreement and Contract* (Appendix C)].

5. Applicant files shall indicate the date and time of receipt of public housing information and CHA's determination of eligible or ineligible. Eligible applicant files will also include: the unit size needed; a completed Unit Requirements Questionnaire; any applicable preference rating; and a history of housing offers highlighting the date, unit address, and the circumstances of each vacancy offered and accepted or rejected.

**E. Applicant Screening Criteria**

1. All CHA applicants will be screened in accordance with HUD's regulations **[24 CFR § 960]** and *CHA Screening Procedures* (Appendix B).

2. All applicants must demonstrate through an assessment of current and past behavior the ability:
   a) To pay rent and other charges as required by the CHA *Residential Lease Agreement and Contract* (Appendix C) in a timely manner;
   b) To care for and avoid damaging the unit and common areas;
   c) To use facilities and equipment in a reasonable way;
   d) To create no health, or safety hazards, and to report maintenance needs;
   e) Not to interfere with the rights and peaceful enjoyment of others, and to avoid damaging the property of others;
   f) Not to engage in any activity that threatens the health, safety or right to peaceful enjoyment of other residents or staff; and not to engage in drug-related criminal activity;
   g) To comply with necessary and reasonable rules and program requirements of HUD and the CHA; and
   h) To comply with health and safety codes.

   The applicant's signature on the application authorizes CHA to make necessary inquiries into the applicant's behavior or background as it relates to lease compliance. This includes obtaining arrest information in order to determine a pattern of behavior and the likelihood of lease compliance.

3. Information requested for applicant screening shall be reasonably related to assessing the conduct of the applicant and other family members listed on the

application. Any costs incurred to complete the application process and screening must be paid by the CHA.

4. Screening factors used in the application process include, but are not limited to: credit check, payment history for utility charges, prior landlord history, a home visit and criminal background checks (including arrest history). If necessary, fingerprints will be used to assure the accuracy of background information obtained. The request for an applicant's fingerprints will be limited to those situations where there is conflicting information regarding an applicant's criminal history or when the law enforcement records center requires the fingerprints for positive identification. (E.g. multiple individuals with the same name.) Failure to meet the requirements of these "checks" will result in applicant rejection.

5. As part of the screening process, all applicants will be required to complete a pre-occupancy orientation and briefing designed by the CHA or the property manager with the assistance of the LAC. In all cases, a pre-occupancy briefing must be completed prior to occupancy of a unit. Failure to attend and satisfactorily complete the briefing will result in rejection of the application and/or withdrawal of a unit offer.

6. Applicants determined eligible and suitable for admission will be notified by mail or in a format designated by the applicant. This notice will include the approximate date of occupancy. However, since the date is an estimate, applicants should not expect to be housed by that date. The availability of a suitable unit to offer a family is contingent upon factors not directly controlled by CHA such as turnover rates and market demands, as they affect bedroom sizes and project location **[24 CFR § 960.207 (b)]**.

7. Applicants determined unqualified for admission will be promptly notified. These applicants will receive a Notice of Rejection from CHA, stating the basis for such determination. CHA shall provide such applicants with an opportunity for an informal hearing on the determination and to present mitigating circumstances. The informal hearing for applicants should not be confused with the resident grievance process. Applicants are not entitled to use the resident grievance process **[24 CFR § 960.207 (a)**].

8. Applicants who are known to have a disability and are determined eligible but fail to meet the screening criteria, will be offered the opportunity to have their cases examined to determine whether reasonable accommodations will make it possible for them to be housed in accordance with CHA Screening Procedures.

## F. Maintenance of Confidential Information

Confidential information from drug rehabilitation centers or law enforcement agencies will be placed in a sealed envelope in a separate folder. The folder will be maintained in a secured file cabinet. This applies to both applicant files and resident files.

## G. Resident Participation in the In-take and Screening Process [24 CFR § 960.206 (c)]

1. **Resident Involvement in Home Visits -** CHA will offer residents the opportunity to participate in the home visit process. Individual residents may be hired to conduct home visits. Also, CHA or the property manager may contract with a resident entity or others to conduct the home visit. All applicants must pass a Home Visit as part of the screening process. Home Visit personnel will report to the CHA Occupancy Department or the property manager. Individuals who conduct a home visit will be required to successfully complete training on fair housing laws.

2. **Mitigating Circumstances Review Panel** – As required by **24 CFR § 960.205 (d)**, CHA and the property manager will consider mitigating circumstances for negative information received that would likely result in the rejection of an application for housing. In the event of the receipt of unfavorable information with respect to an applicant, consideration shall be given to the time, nature, and extent of the applicant's conduct and to factors that might indicate a reasonable probability of favorable future conduct or financial prospects. For example:

   a) Evidence of rehabilitation;

   b) Evidence of the applicant family's participation in or willingness to participate in social service or other appropriate counseling service programs and the availability of such programs; or

   c) Evidence of the applicant family's willingness to attempt to increase family income and the availability of training or employment programs in the locality. **[24 CFR § 960.205 (d)]**

3. The CHA or the property manager will refer the case to a Mitigating Circumstances Review Panel. Panels will be site based but they are optional. This provision does not require a particular site to establish a review panel. Site-based panels are at the option of the property manager. (Should site-based lists not be available at all locations, CHA will create a panel at the Occupancy Department using the criteria established in this policy.) It is the policy of CHA to include residents on this Panel.

   It is the policy of CHA to require that both residents and the property manager be represented on the panel. Staff from CHA's Occupancy Department may also participate either as alternates or upon request from the property manager.

   The requirements for the Admissions Advisory Committees (AAC) also apply to the Mitigating Circumstances Review Panel. The Panel will maintain a pool of residents who will serve on the panel on a rotating basis.

As the CHA adopts site-based waiting lists, site-based review panels may be created by the residents and property managers. Such panels will include the Property Manager and residents. No resident shall serve on a panel that reviews the application of a relative.

Resident Mitigating Circumstances Review Panel members will be held to the same ethical and privacy standards as CHA employees and must sign binding statements to that effect. Residents serving on the Panel are subject to applicable fair housing laws and will be required to successfully complete training on fair housing laws to be provided by the Occupancy Department. Violations of either ethical or privacy standards or discrimination by any panel member will result in dismissal from the Panel. The recommendations of a Mitigating Circumstances Review Panel are advisory and in all cases the final decision regarding admission to public housing shall be with the property manager.

4. **Resident Involvement in Applicant Pre-Occupancy Orientation -** All applicants are required to complete a pre-occupancy briefing designed by CHA, the property manager or by the resident leadership. The pre-occupancy program is expected to be a cooperative effort between the property manager and the LAC at the site. A pre-occupancy briefing may be designed to address CHA-wide issues, site-specific issues, or a combination of both. Orientation programs will be required to include the following topics:

a) Rights and responsibilities of CHA and the resident;

b) How rent is calculated;

c) Security issues;

d) Re-certification requirements;

e) The lease;

f) The move-in inspection;

g) Care of the unit and how to request maintenance;

h) Reasonable accommodations and modifications for persons with disabilities;

i) Services available in or near the development;

j) The resident association; and

k) How to conserve utilities, read a utility bill, and family budgeting.

The CHA or the property manager may contract with other entities to deliver the pre-occupancy orientations. All applicants must attend the orientation in order to complete the screening process.

5. **Admissions Advisory Committees -** The CHA encourages the property managers, LACs and other recognized resident organizations (E.g. Board of cooperative) to develop Admissions Advisory Committees (AAC). This policy establishes the framework under which these committees must operate. Because of the Fair Housing implications, Advisory Committees must adhere to the following requirements. Failure to do so will result in disbanding of the committee.

   a) The AAC will interview applicants and review selected information about applicants being considered for housing at each site;

   b) All committees will use a standardized questionnaire developed by the CHA in conjunction with the CAC. Approval by the Chief of Operations and the CHA's Legal Department is required;

   c) Questionnaires <u>must not</u> include questions previously asked by the Occupancy Department or the private manager during the admissions process;

   d) Residents serving on an AAC are subject to applicable fair housing laws and will be required to successfully complete training on fair housing laws to be provided by the Occupancy Department;

   e) Residents are responsible for disclosing information to the Panel, which may be determined as a conflict of interest. (E.g. serving on the panel where a relative or an employer is involved);

   f) Violations of ethical or privacy standards or discrimination by any committee member will result in dismissal from an AAC. The standards described for the Mitigating Circumstances Review Panel also apply to the AAC; and.

   g) Residents involved or employed by CHA in other parts of the screening process (i.e. Home Visit Teams, Mitigating Circumstances Review Panel, etc.) are prohibited from being members of an AAC.

6. **Resident Admissions Advisory Committee Welcome** — All developments must establish a program of post-occupancy follow-up. The AAC will work with the property manager to design a follow-up "welcome" program for new residents of each property. The objective of the post move-in follow-up will be to provide additional orientation through resident-to-resident assistance so that new families do not become isolated and issues of lease noncompliance (if any) can be addressed early in order to avoid eviction. Post-occupancy follow-up must include at least one (1) apartment visit within 30-60 days of new resident move-in.

## IV. Factors Affecting the Offering Process

Certain factors, such as bedroom size, accessible features, and unit designation, affect the "matching" of a qualified applicant family to a housing unit, and thereby influence offers of housing.

### A. Bedroom Size and Unit Standards

The CHA will house applicants and residents according to their appropriate bedroom size. Households are matched to units according to family size, the minimum and maximum persons allowable per unit, and general occupancy standards with discretion permitted to accommodate family circumstances and family choice.

1. The CHA has established a minimum and maximum number of persons allowable per unit using the standards highlighted in the table below. In using this table, the living room or dining room will not be used as a bedroom.

**Minimum-Number-of-Persons-Per Unit Standard**

| Number of Bedroom | Max Persons/Unit | Min Persons/Unit |
|---|---|---|
| 0BR | 1 | 1 |
| 1BR | 2 | 1 |
| 2BR | 4 | 2 |
| 3BR | 6 | 3 |
| 4BR | 8 | 6 |
| 5BR | 10 | 8 |
| 6BR | 12 | 10 |

2. The CHA has two categories of occupancy standards that will be used when determining the appropriate bedroom size for a household: 1) standards that can be modified only by exception as described in paragraph b) below; and 2) standards that can be modified at the family's request as described in paragraph c) below.

   a) In determining bedroom size for a family, the following criteria will be used in conjunction with the above:

      (1) Each adult (other than adult children) or couple receives a bedroom;

      (2) Each child (including adult children) receives a bedroom except that children of the same gender within seven (7) years of age must share a bedroom;

      (3) Unborn children are not counted in figuring bedroom size;

(4) A live-in attendant must be assigned a bedroom;

(5) Children who are temporarily away from the home because of placement in foster care, kinship care or away at school will be considered in bedroom size;

(6) Housing assistance limitation for single persons: A single person who is not an elderly person, person with a disability, or displaced person, or the remaining member of a resident's family, will not be provided a housing unit with two or more bedrooms [**24 CFR § 5.405 (c)];**

(7) A household may receive a unit with two or more bedrooms when assisted by a live-in aide or for purposes of reasonable accommodation;

(8) A displaced person (as defined in **24 CFR § 5.403**) may occupy a unit with two or more bedrooms if zero to one-bedroom units are not available at the time of displacement designation. However, upon re-certification, a displaced person is subject to unit standards and will be housed according to the appropriate bedroom size; and

(9) A remaining family member may occupy a unit with two or more bedrooms if the unit in which they reside is larger than a one-bedroom unit. However, upon re-certification, the remaining family member is subject to the unit size standards and will be housed according to the appropriate bedroom size.

b) In applying the above criteria, CHA may make adjustments in unit size standards for the following reasons:

(1) In providing reasonable accommodations to persons with disabilities;

(2) To allow for redevelopment plans or marketing concerns; and

(3) On an exception basis, the Chief of Operations or designee can make allowances.

c) The following exceptions to unit standards <u>can</u> be made at the request of the family to expedite an offer of housing. Any requests by the family must be in writing and will be documented in the file.

(1) Persons of different generations (parent, child, grandparent) or opposite sex (other than husband and wife) may occupy the same bedroom;

(2) Two children of the opposite sex may share a bedroom; or

(3) A single head of household parent may share a bedroom with his/her children.

3. Under these unit standards, applicant households may be eligible for more than one bedroom size. In such instances, the family may wait for both bedroom sizes. (E.g. To be housed quicker, a mother with an infant chooses a one-bedroom unit over a two-bedroom unit to be housed quicker.) At any time during the occupancy process,

an applicant may withdraw the request to modify occupancy standards to be housed in a smaller unit. This action will not be considered a refusal of housing.

4. A family that chooses to occupy a smaller unit must agree not to request a transfer for one year commencing from the date the family moves into the smaller unit. During the one-year period, should a unit of appropriate size become available the property manager may offer the family a transfer.

5. For purposes of construction or rehabilitation of units, the unit bedroom size distribution will be based on the bedroom size demand from the property waiting list. Other factors that will be considered include: census tract information regarding the average size of low-income families, redevelopment plans, the current CHA population (including relocatees or families returning to the site) and budgetary and design limitations.

6. **Chicago City Code 34 (13-196-490)** requires that, "Every room occupied for sleeping purposes by more than one occupant shall contain at least fifty square feet of floor area for each occupant twelve years of age and over and at least thirty-five square feet of floor area for each occupant under twelve years of age." All CHA new construction and all rehabilitation projects (when the rehabilitation calls for the reconfiguration of the bedroom and living spaces) will be designed to this standard.

## C. Accessible Units

Refer to Section V, Paragraph C.

## D. Designated Units

1. Listed below are three types of designated units. When such matching is required or permitted by law, CHA will give preference to the families described below:

   a) **Units Designated for Elderly Families[9] (implementing regulations at 24 CFR §§ 945.201, 945.105, 945.203, and 945.303) -** elderly families will receive a preference for admission to such units or buildings covered by an approved Allocation Plan. CHA has a HUD approved Allocation Plan for twenty buildings;

   b) **Units Designated for Families with Disabilities[10] (implementing regulations at 24 CFR §§ 945.105, 945.201, 945.203, 945.205, and 945.303) -**

9. **Elderly Family** means a family whose head, spouse, or sole member is a person who is at least 62 years of age; or two or more persons who are at least 62 years of age living together; or one or more persons who are at least 62 years of age living with one or more live-in aides.

10. **Families with Disabilities means** a family whose head, spouse, or sole member is a person with disabilities; where two or more persons with disabilities are living together; or where one or more persons with disabilities is living with one or more live-in aides.

disabled families will receive a preference for admission to units that are covered by an approved Allocation Plan;

c) **Mixed Population Units**[11] (implementing regulations at 24 CFR §§ 945.105, 960.401, 960.403, 960.405, 960.407) — elderly and families with disabilities will receive equal preference for admission to these units.

Nothing in this policy is to be construed to impose or require any specific quotas or ratios of seniors to families with disabilities. Such quotas or ratios are strictly prohibited.

11. A **mixed population development** is a property (or portion of a property) that was: reserved for elderly and families with disabilities at its inception and has retained that character; or the CHA obtained HUD approval to give preference in resident selection to elderly families and families requiring accessible or adaptable units **[24 CFR § 960.405]**. These developments were formerly known as elderly developments.

## V. Resident Selection and Assignment Plan – Site Based Waiting Lists (Pending HUD approval)

In compliance with applicable court orders, CHA's policy is that each applicant will be able to select up to three (3) developments where they wish to be placed on the waiting list, or, if their housing need is urgent, the first available unit. The sequence of offers for any waiting list will be based upon date and time the application is received, type and size of unit needed and selected by the family, and factors affecting preference or priority that are consistent with the objectives of Titles VI of the Civil Rights Act of 1964 and Title VIII of the Civil Rights Act of 1968 and the HUD regulations and requirements pursuant thereto **[24 CFR §§ 1.4 (b)(2) (ii)(iii), 100 et seq.]**.

### A. Waiting List and Offers of Housing

1. When a waiting list is open, families may submit applications for public housing at any location approved by CHA. The CHA or the property manager will conduct an annual review of all lists, asking applicants to renew their interest in public housing.

2. All applications are time and date stamped upon receipt by the Occupancy Department; management site office; or the Latino Site Offices. Applicants will be placed on their chosen waiting list(s) by date and time of application.

3. The property manager will monitor the site-based waiting lists and schedule applicant interviews based on projected unit turnover. The objective is to maintain a ready pool of eligible and suitable applicants to whom offers of housing will be made.

4. Offers of housing will be made in a central location, the Occupancy Department. The CHA is requesting that offers be made at the site level. Upon HUD approval and authorization by the Gautreaux Court of this Tenant Selection Assignment Plan (TSAP), offers will be made at the site level.

5. When an applicant's name reaches the top of any of one of the three (3) chosen lists and they are determined eligible and pass applicant screening, they will be made an offer of housing.

6. Making the Offer

   When an applicant's name reaches the top of any of the three (3) lists, the applicant is determined eligible and the applicant passes screening, they will be made an offer of housing. (Site-based offers require authorization by the Gautreaux Court.) The CHA or the property manager will attempt to monitor the waiting lists and the probable unit turnover so that offers will occur 30 to 60 days in advance of a unit becoming available.

   a) Offers are communicated by phone or mail. Offers made over the phone will be confirmed in writing. When an applicant has requested an alternate

form of communication as a reasonable accommodation, the applicant will receive communication designated by the applicant. (E.g. Use of auxiliary aides or services.) The CHA or the property manager will also "post" offers made at the Occupancy Department and the property manager's office. The posting will be by unit address and location referenced against the last name and client number of the applicant.

b) Offers made over the phone will be confirmed by letter to the applicant. If the CHA or property manager is unable to contact an applicant by phone, a notification letter will be sent to the last known address of the applicant. If provided in the applicant's file, a copy of the offer letter will also be sent to the address of a primary contact person designated by the applicant. Other means of communication will be used as designated by the applicant. Applicants who do not respond to this notice within ten (10) working days of the date of the notice will be considered "non-responsive" and withdrawn from all three (3) waiting lists. The CHA or the property manager will consider reinstatement requests for documented reasons relating to a disability or to extenuating circumstances. Such circumstances must rise to the level that the applicant could not have responded to the offer in the time allowed. (E.g. hospitalization, sequestered jury.) **[24 CFR § 8.27]**.

7. The CHA and the property manager will maintain a record of units offered, including location, date, and circumstances of each offer, and each acceptance or rejection, including the reason for the rejection. The property manager must record this information in the computer system for the purpose of identifying "hard to market" units.

8. Offer Accepted: After accepting the offer of housing, the applicant will be contacted by the property manager and shown a vacant unit in their selected location. Units and applicants are matched based on the size and type of housing required by an applicant, taking into account priorities for accessibility and allocation plans. If more than one unit of the appropriate size and type is available, the first unit offered to the applicant will be the first unit ready with the oldest vacancy date.

9. Offer Declined: If an applicant refuses the offer of housing (without "good cause") their name will be placed at the bottom of all three (3) of their chosen waiting lists. This will be done by changing the date and time of application from the original date to the date and time of the documented refusal of housing. At the time of refusal, applicants may choose to remove themselves from one or more of the waiting lists on which their name appears. However, they may not choose another list(s) as a replacement. All refusals must be acknowledged in writing by the applicant.

10. Sometimes a refusal need not result in loss of the applicant's place on their chosen waiting lists. If an applicant is willing to accept the unit offered but can document the inability to move at the time of the offer, then the applicant may keep their place on the list. Or, if acceptance of an offer of a suitable vacancy will result in undue hardship not related to considerations of race, color, sex, religion, disability, or national origin, then the applicant will keep their place on all waiting lists. **[24 CFR § 1.4 (b) (2) (ii) & (iii)]** The applicant must be able to document that the hardship claimed is "good cause" for refusing an offer of housing. Where "good cause" is verified to the CHA's or the property manager's satisfaction, the refusal of the offer shall not require that the applicant be dropped to the bottom of all waiting lists or otherwise affect the family's position on any waiting list. **[24 CFR § 1.4 (b) (2) (ii) & (iii)].**

11. Examples of good cause reasons for the refusal of an offer of housing include, but are not limited to:
    a) Inaccessibility to source of employment, education, or job training that would require an adult household member to quit a job, drop out of an educational institution, or job training program. Or inaccessibility to children's day care or educational program that would take a child out of day care or an educational program; or
    b) Presence of lead paint in the unit offered when the applicant has children under the age specified by current law which is under seven (7) years of age;
    c) The family demonstrates to CHA's or the property manager's satisfaction that accepting the offer will place a family member's life, health, or safety in jeopardy. The family must provide specific and compelling documentation such as restraining orders, other court orders, or risk assessments related to witness protection from a law enforcement agency or a threat assessment that verifies danger from criminal activity. Reasons offered must be specific to the family (E.g. hate crimes). Refusals due to location alone are not good cause;
    d) The unit is inaccessible and does not accommodate the applicant's disabilities, or the family does not need the accessible features in the unit offered and does not want to be subject to a 30-day notice to move;
    e) An elderly or disabled family makes the decision not to occupy or accept occupancy in designated housing[12] **[24 CFR § 945.303 (d)];**
    f) The unit is not ready for occupancy and will not be ready in a reasonable period of time. Such time will be mutually agreed upon by the property manager and the applicant, but shall not exceed sixty (60) days. Property managers are charged with the responsibility to lease only those units that are ready as mutually agreed upon by the property manager and the applicant in writing.

[12] At this time CHA has no buildings designated for Disabled Families.

12. Examples of good cause related to an applicant's willingness to accept an offer but inability to move at the time of the offer include:

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

b) The family head, spouse or sole member is serving on an impaneled jury.

## B. Housing Transfers and the Offering of Units

Three of the four types of transfers will take priority over new admissions:

- Emergency;
- Administrative;
- Allocation Plan; and
- Resident-Initiated (no priority)

These transfers will be offered housing before new admissions. See Transfer Policy, Section VII of this document.

## C. Occupancy of Dwelling Units with Accessible or Adaptable Features

Units with accessible or adaptable features will be offered first to current residents with disabilities in need of the units' features before offering such a unit to an applicant with a disability.

1. Offers of housing for all accessible or adaptable units will first be made to current residents having a disability and who require the accessible features of the vacant unit. (In effect, a transfer of the resident with disabilities from a non-adapted unit to the vacant accessible/adapted unit).

2. If there is no current resident in need of the unit, the unit will be offered to an eligible applicant having a disability that requires the accessibility features of the vacant unit **[24 CFR § 8.27 (a) (1) (2) and (b)]**.

3. If there is no such applicant and the CHA offers the unit to an applicant without a disability, CHA will require the applicant to agree to move to an available non-accessible unit within 30 days when either a current resident or an applicant needs the features the unit provides. This requirement will be reflected in the lease agreement signed with the applicant **[24 CFR § 8.27 (a) (1) (2) and (b)]**.

## D. Offering of Designated Units

1. Designated units will be first offered to applicants whose household characteristics "match" those of the vacant unit available. By matching unit and family

characteristics, families with a lower position on the waiting list may receive an offer of housing ahead of families with a higher position on the list with an earlier application date.

2. If there are no "matching" families on the waiting list, the unit will be offered to the family at the top of the waiting list for the appropriate bedroom size. The following preference will be applied: single applicants that are elderly, have a disability, are displaced, or are near-elderly will be given occupancy preference over a single person applicant who is not elderly, person with a disability, displaced, or near-elderly. This preference exists regardless of the single person applicant's date of application. (See Section on Local Preferences, III.B.1.)

## E. Scattered Site Units

Scattered Site applicants will be selected and assigned in accordance with the orders of the Federal court in the Gautreaux case. Fifty (50) percent of the scattered site units shall be designated as "community area" and are offered to applicants from that particular community. Community area residents living in the census tract where the new housing is built will be given a priority. Twenty-five (25) percent of the units shall be designated as "transfer" units and offered to residents who meet the requirements set forth in the CHA's transfer policy. The remaining 25% of the units shall be designated as "waiting list" and will be offered to applicants on CHA's waiting lists. These ratios will be further structured to encourage income mixing and the de-concentration of low-income.

The CHA will provide the following table as an example of how the mixed income percentages and scattered site Gautreaux assignment will work:

Example: 16 scattered site units need to be filled; 50% are from the community area, 25% transfer from CHA, and 25% are from the waiting list for the site.

| **Gautreaux Unit %** | **50% Community Area** | **25% Waiting List** | **25% Transfers** |
|---|---|---|---|
| Number of units | 8 | 4 | 4 |
| **Tier I** - 50% of new admissions are at 0 - 30% of area median | 4 | 2 | N/A |
| **Tier II** - 50% of new admissions are at 31% to 80% of area median | 4 | 2 | N/A |

## F. Occupancy of Units Created as a Result of the CHA Redevelopment Activities

If the CHA is involved in redeveloping areas, with partners or alone, displaced families from the existing development will be given a priority for new housing subject to the specific requirements of approved redevelopment plans and any right of return.

Subject to unit availability, the CHA will provide former residents of a redevelopment property with a right to return to a public housing community of their choice. Under this paragraph, families will receive one offer to satisfy right of return. Offers are subject to good cause refusals as spelled out in this policy. Any limitations on right of return will be specified in the redevelopment plan for the property. (The CHA cannot guarantee that all families displaced by redevelopment activities will be able to return to their site of origin.) The CHA will grant return rights to all lease compliant residents including those residents who opt to take a certificate or voucher. "Lease Compliant" as used in this paragraph includes the period during which the family lives in CHA housing and any period of Section 8 assistance.

## VI. Leasing and Occupancy of Dwelling Units

### A. Showing Units Prior to Leasing

**1.** When an offer of housing is made, applicants will be advised that the property manager will be contacting them to set the date and time when the applicant will view the unit to be leased. The property manager will provide the applicant with information describing the property and neighborhood. (E.g. access to public transportation, schools, parks, etc.)

**2.** Property managers will only show and lease ready units of the appropriate size and type. If the applicant accepts the unit, the property manager will verify when the unit will be ready for occupancy and execute a lease. If the applicant refuses the unit, a signed reason for refusal **must** be obtained from the applicant. A copy of the refusal form is then sent to the Occupancy Department to review any "good cause" determinations (see Section V, Paragraph A.9,10 for definition of good cause). Property managers will consult with the Occupancy Department when questions arise concerning good cause.

**3. No lease will have an effective date before the unit is ready for occupancy.**

### B. General Leasing Policy

Units will be leased without regard to the race, religion, sex, age, national origin, disability or familial status of applicants, except as specifically provided herein.

1. All CHA units will be occupied pursuant to a signed CHA *Residential Lease Agreement and Contract* (Appendix C) that complies with HUD's regulations **[24 CFR § Part 966]**.

2. In accordance with CHA's obligations under the Resident Lease Agreement and Contract (Appendix C), CHA management will not move a family into a unit that does not meet basic standards of habitability including applicable HUD occupancy standards.

3. Prior to actual admission, the lease shall be signed by the head and co-head of household and by the property manager or other authorized CHA representative, **[24 CFR § 966.4 (p)]**.

4. Changes in family composition, income, or family status occurring between the time of the eligibility interview and the leasing of the unit will be processed by the Occupancy Department or by the property manager. Changes occurring between annual re-examinations will be processed by the property managers.

5. If a resident transfers from one CHA unit to another, a new lease will be executed for the dwelling unit into which the family moves.

6. If at any time during the life of the lease agreement and contract, a change in the resident's status results in the need for changing or amending any provision of the lease, either:

   a) A new lease contract will be executed;

   b) A Notice of Rent Adjustment will be executed; or

   c) An appropriate rider will be prepared and made a part of the existing lease, or appropriate insertions will be made within the lease. All copies of such riders or insertions are to be dated and signed by the resident and by the property manager or other authorized CHA representative **[24 CFR § 966.4 (o)]**.

7. Property Managers will keep the Occupancy Department advised as to the date units will be vacant and ready by using the designated computer system and properly coding of vacant units. Modernization and Redevelopment will also advise property managers and the Occupancy Department in writing of available vacant and ready units.

## C. The CHA Policy on Live-in Aides

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

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

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

4. A relative acting as a live-in aide can be added to the lease as a household member. Such additions are subject to all the requirements of adding new household members including receipt of approval from the property manager and the screening requirements. Addition of a relative in this manner means that the income of the relative is counted toward the rent. In the event the head of household moves from the unit a relative added in this manner can become the remaining member of a resident family with lease rights to the unit. The relative/live-in aide must choose whether to be considered a live-in aide with no right to the unit or a member of the household. The relative cannot be classified as both.

5. A Live-in Aide can be a single person. A live-in aide with a family may also be considered for admission to the unit provided that the addition of the Live-in Aide's family does not result in overcrowding of the existing unit. The adult members of the Live-in Aide's family must meet CHA's screening criteria.

6. Screening criteria for Live-in Aides is the same as screening criteria for new applicants as defined is section III.E.2.

## D. Additions to the Household and Visitors

1. Only those persons listed on the most **recent lease or certification form** shall be permitted to occupy a dwelling unit **[24 CFR §§ 960.209 (b) and 966.4 (a) (2)].** Except for births to or adoptions by family members, any family seeking to add a new member must request approval in writing prior to the new member occupying the unit **[24 CFR § 966.4 (f) (3) & (c) (2)].** CHA will not unreasonably withhold such approval**.**

2. Following the receipt of a family's request for approval to add a new person to the lease, CHA will conduct a pre-admission screening of the proposed new member. The results of screening shall be used to determine whether the CHA will approve the admission of the new member. This screening will take no more than ten (10) working days.

3. In accordance with state law, certain criminal or arrest information for household members under the age of 18 years is not available (exception: emancipated minor). This does not preclude CHA from using such information when a household member under the age of 18 years is being prosecuted as an adult under the law. This provision is subject to change should the State or municipality modify its laws concerning the availability of police or court records for juvenile offenders.

4. Examples of situations when an additional family member is screened before being added to the household:

   a) Resident requests to add the new spouse to the lease;
   b) Resident desires to add a new adult family member to the lease, employ a live-in aide, or take in a foster child(ren);
   c) An adult assumes responsibility as the head of house for a family whose remaining family member(s) is under 18 and is not an emancipated minor(s).

5. Residents who fail to notify CHA of additions to the household or who permit persons to join the household without undergoing screening are in violation of the lease. Such persons will be considered unauthorized occupants by CHA and the entire household will be subject to retroactive rent charges and/or eviction **[24 CFR § 966.4 (f) (3)]**.

6. If a guest or family member stays with a resident household longer than 30 days, management must be notified. Guests are not permitted to stay longer than 30 days in any calendar year. If the guest or family member stays longer than 30 consecutive days, the leaseholder must submit a written request to the property manager asking for permission to extend the visit. The written request must state the

reason for the extension with the length of stay specified with a calendar date. (E.g. Father who has custody of his children for the duration of the three-month summer break would like to extend his children's visit from July 1, 1999 until August 30, 1999.) If a written request for an extension is not submitted to the property manager, the leaseholder must either 1) remove the guest from the unit or 2) request that the guest be placed on the lease in accordance with D.11. of this section.

7. Residents are not permitted to allow roomers and lodgers to occupy a dwelling unit. Violation of this provision is grounds for termination of the lease **[24 CFR § 966.4 (f) (2)]**.

8. Residents shall not knowingly allow a former resident of CHA who has been evicted for violation of a material term of the lease to occupy the unit for any period of time. Violation of this requirement is grounds for termination of the lease.

9. Family members who move from the dwelling unit shall be removed from the lease **[24 CFR § 966.4 (f)(3)].** The resident has the responsibility to report the move-out within 30 calendar days of its occurrence. Individuals may be readmitted to the unit subject to applicable income limits, preferences, resident selection, and screening requirements.

10. Any additions to the unit shall not cause over crowding. Medical hardship, or other extenuating circumstances, shall be considered by CHA in making determinations under this paragraph.

11. If unauthorized occupants are discovered applying for CHA housing, their application for housing will be denied. However, the head of household will be allowed to add the unauthorized occupant to the unit if the following steps are taken:

    a) the head of household requests via their property manager to place the unauthorized occupant on their lease within 30 days of discovery;
    b) The Occupancy Department or the property manager screens the unauthorized occupant to determine if they will be eligible for admission to the existing unit; and;
    c) If the unauthorized occupant is deemed eligible for admission to the existing unit, their addition to the lease does not cause overcrowding as stated in VI.D.10 above.

    Refusal to add this unauthorized occupant to the lease is grounds for termination of the lease. Upon discovery, residents who have unauthorized occupants living in their unit are in violation of the lease and will be subject to retroactive charges and lease termination.

## VII. Transfer Policy

The CHA will implement this policy to transfer a CHA household from the household's current unit to another unit of suitable size and type located in a building other than the building where the family currently resides. Transfers will be granted without regard to the race, religion, sex, age, national origin, disability or familial status of residents.

### A. Types of Transfers

CHA has four types of transfers: Emergency, Administrative, Allocation Plan, and Resident-Initiated Transfers. Emergency, Administrative, and Allocation-Plan Transfers will take priority over new admissions and Resident-Initiated Transfers.

1. **Emergency Transfers** are mandatory transfers that are implemented when unit or building conditions pose an immediate threat to resident life, health, or safety as determined either by CHA or in a legal proceeding (examples: fire, flood, lack of heat, code violations, or lead-elevated blood levels).

   a) CHA is not required to give prior notice of an Emergency Transfer.
   b) Refusal to comply with an Emergency Transfer can be grounds for lease termination.
   c) Conditions such as flood, fire, or lack of heat that occur due to resident neglect or abuse will be considered emergency transfers, however the resident will be charged for the damage caused to the former unit. (Residents may challenge any charges for damages of the CHA via the grievance process.)

2. **Administrative Transfers** are mandatory transfers for the purposes of: closing a building; implementing redevelopment or building rehabilitation activities; achieving vacancy consolidation; and adjusting for overcrowded living conditions (when the family has more than two persons per bedroom) or over-housed living conditions (when the family has fewer than one person per bedroom.) In addition, as a part of the reasonable accommodation process, transfers of a family with disabilities to an accessible unit are Administrative Transfers.

   a) The CHA will provide a minimum of a thirty-(30) day notice to residents in writing. Where practical, the CHA will provide residents with additional notice time. Residents will receive 120 days notice for vacancy/building consolidation transfers. The resident will be provided with information regarding housing options to include: another CHA unit, Section 8 voucher/certificates, and scattered sites. Where practical, for transfers subject to the Uniform Relocation Act (URA), the CHA will provide notice in accordance with URA standards.
   b) Upon request by the resident, Administrative Transfers may be used to alleviate verified medical problems of a life threatening nature or when household members need protection from attack by a criminal element in a

particular property or neighborhood based on a threat assessment by a law enforcement agency (i.e. witness protection program, domestic violence, etc.).

c) To the extent possible, the CHA will allow residents in **good standing** to choose the development to which to transfer when implementing Administrative Transfers for redevelopment or rehabilitation units. However, resident-initiated transfers will not take priority over families with the right of return.

The conditions for good standing are:

i) Resident is current with rent with no unpaid balance at any time in the past year or is current on a repayment agreement with no unpaid balance at any time in the past year;

ii) Resident has good credit history with utility companies (when applicable) as described in more detail in section V.F.;

iii) The Resident has no criminal activity or history of disturbances that resulted in lease violations or violations as defined in Section II, Eligibility for Admission, and Section IX, Lease Termination Procedures as indicated by notices of lease violation in the resident's file; and

iv) The Resident has a good housekeeping record, as indicated by housekeeping inspection reports in the resident's file.

d) Refusal of an Administrative Transfer can be grounds for lease termination. Residents have the right to grieve an Administrative Transfer. However, a grievance must be submitted to the housing manager within 30 days of the resident's receipt of the first written notice of transfer.

3. **Allocation-Plan Transfers** are non-mandatory, resident initiated, transfers available to residents of allocation-plan buildings or to residents in a non-designated building who meets the requirements of an allocation plan. (Example: a non-elderly resident with disabilities living in a senior-only building may request an allocation plan transfer to a mixed population building or a senior living in a mixed population building may request a transfer to a senior designated building.)

4. **Resident-Initiated Transfers** are non-mandatory transfers available to residents in good standing that have resided in a development for at least one year. Resident-Initiated Transfers include but are not limited to: a resident who desires to live in another CHA development; management proposes a transfer for a resident in good standing; and to address situations such as neighbor disputes that are not criminal but interfere with the peaceful enjoyment of the unit or common areas.

**B.** The CHA will apply the same screening criteria used for new applicants to Administrative, Allocation Plan and Resident-Initiated transfers. Household members that cannot pass screening may be denied a transfer.

**C.** Resident-Initiated Transfers are coded as transfers and placed on the appropriate waiting list, according to date and time of transfer request. Emergency, Administrative, and Allocation-Plan Transfers have priority over new admissions.

**D.** Typically, Emergency and Administrative Transfers will be based on the availability and appropriate bedroom size without regard to location. Residents eligible for an Allocation Plan or a Resident Initiated Transfer will be placed on up to three (3) site-based waiting lists of the resident's choice by date and time of transfer request.

**E.** When transferring families into other CHA buildings, the CHA will take into consideration issues of personal safety as documented by a threat assessment performed by CHA management or a recognized law enforcement agency. If such safety issues exist, and to the extent possible, CHA will provide the family an alternative unit.

**F.** As the composition of the waiting lists change, the CHA may make offers of housing based on a ratio of new applicants to Resident-Initiated Transfers for any site (except scattered sites, which have a ratio set by the Gautreaux Judgment order[13]). Ratios will be employed when the projected turnover rate will not allow for offers of housing to be made to transfer households within a reasonable time period. When a ratio is implemented for a specific waiting list, affected applicants and transfer households will be notified of the ratio and its impact on waiting times. Different ratios may be set for waiting lists depending on housing stock marketability and transfer demand.

**G.** The CHA will bear the cost of Emergency and Allocation-Plan Transfers. CHA will also bear the cost for Administrative Transfers except Administrative Transfers due to overcrowded or over-housed living conditions. Residents are responsible for costs incurred under Resident-Initiated Transfers. (E.g. moving expenses, utility reconnection fees, etc.)

13 In accordance with the Gautreaux Judgment Order, scattered site units are offered based on a 50%, 25%, 25% ratio: fifty percent of all units are allocated for low-income community area residents; twenty-five percent of all units are allocated for current CHA Resident Initiated Transfers and twenty-five percent of all units are allocated for applicants waiting on the public housing waiting list.

## VIII. Annual Re-Certification, Interim Re-Certification, and Remaining Family Members

**A.** All households will be re-certified every year upon the anniversary of the CHA *Residential Lease Agreement and Contract* (Appendix C). The purpose of this annual re-certification is to update family income information and family composition, to make any necessary changes to the rent, to verify eligibility for continued occupancy, and to renew the CHA *Residential Lease Agreement and Contract* (Appendix C) **[24 CFR § 960.209 (a)].**

**B.** Residents will be notified in advance regarding the date of the re-certification. At that time, CHA will advise households of any documents needed for the re-certification.

### C. Re-Certification Procedures

1. At the time of re-examination, the head(s) of the household are required to sign an application for continued occupancy, a renewed lease contract, and other forms required by HUD.

2. Employment, income, allowances, Social Security numbers, criminal background checks, and such other data as is deemed necessary (including income that has been disregarded according to CHA policy) will be verified and documented in the resident's folder **[24 CFR § 960.206].** Residents receiving information about a change in income, earnings, wages, or unemployment compensation must disclose such information to the CHA [Title V of H.R. 4194 (Quality Housing and Work Responsibility Act) § 508]. (See Section XII. 15.)

3. Verified information will be analyzed and a determination made with respect to:

   a) Family Composition: eligibility of the resident as a family or as the remaining member of a family;
   b) Results of criminal background checks and the need for any lease enforcement action;
   c) Unit size required for the family;
   d) Rent the family will pay;
   e) The need to transfer the family to a smaller or larger unit, or a unit with accessible features; and
   f) Community service requirements, applicable to adult family members who are not working, attending school full-time, participating in approved job training, or unable to work, attend school or job training due to verified age or disability. [Title V of H.R. 4194 (Quality Housing and Work Responsibility Act) § 512].

4. Income shall be computed in accordance with the definitions and procedures set forth in Section XI of this policy **[24 CFR § 5.609]**.

5. Families failing to respond to a notice of a re-certification will be sent a notice of lease violation. Failure to respond to the notice of lease violation will result in termination of the lease **[24 CFR § 886.124 (c)]**.

6. During recertification, residents will be given the choice among: 1) rent based on their income; 2) a flat rent based on the value of the dwelling unit; 3) or ceiling rent based on the cost to operate the unit. **[Title V of H.R. 4194 (Quality Housing and Work Responsibility Act) § 523**]. (See Section VIIIE.)

## D. Eligibility for Continued Occupancy

Households that meet the following criteria will be eligible for continued occupancy:

a) Qualify as a family as defined in Section XII of this policy;
b) Have no record of criminal activity and are in full compliance with the lease;
c) Are in full compliance with the resident obligations and responsibilities as described in the *Residential Lease Agreement and Contract* (Appendix C**),** including the community service requirement, **[Title V of H.R. 4194 (Quality Housing and Work Responsibility Act) § 512];**
d) Each family member who contends that he or she is a U.S. citizen or a non-citizen with eligible immigration status and provides a written declaration, signed under penalty of perjury, by which the family member declares whether he or she is a U.S. citizen or a non-citizen with eligible immigration status **[24 CFR §§ 5.508(c)]**; or
e) All members receiving housing assistance are citizens or have verified eligible immigration status. Every member of a resident family has submitted either a signed declaration of citizenship or evidence of eligible immigration status as required by **[24 CFR § 912.6]**.

## E. Action Following Re-Certification

1. If there is any change in rent, a new *Residential Lease Agreement and Contract* (Appendix C) will be executed and a Notice of Rent Adjustment will be issued **[24 CFR § 966.4 (c) & (o)]**.

2. If any change in the unit size is required, the resident will be placed on a transfer list in accordance with the transfer criteria described in Section V of this policy and moved to an appropriate unit when one becomes available **[24 CFR § 966.4 (c) (3)]**.

3. If a household's income increases above the income eligibility requirements, the household may remain in a CHA unit unless:

a) The CHA has identified, for possible rental by the family, a unit of decent, safe and sanitary housing of suitable size available at a rent not exceeding thirty percent (30%) of adjusted monthly income as defined by the Authority for the purpose of determining rents;

b) CHA is required to do so by local law; or

c) If either a) or b) are applicable and the household refuses to move, CHA may commence eviction proceedings or decline to renew a lease **[24 CFR § 960.210]**.

## F. Interim Recertifications (Subject to lease revisions)

1. Between annual re-certifications, residents must report the following changes:
An individual(s), age 18 or older with income, is added to the household;

   a) The resident's income is so low that the Total Resident Payment is $0 and the resident's income changes; or

   b) The resident obtains work after a six-month period of unemployment; or any family member has an increase in income as a result of participation in a qualifying self-sufficiency or other job-training program.

2. Changes listed in 1. above must be reported within ten (10) calendar days of occurrence.

3. Residents who can verify eligibility for an income disregard will have rent increases deferred. Residents who abuse the *Income Disregard Procedures* (Appendix D*)* or who quit work to avoid being employed at the next regular reexamination will be subject to retroactive increases.

4. Residents with seasonal or part-time employment of a cyclical nature will be asked for third-party documentation from the employer verifying the circumstances of their employment including starting and ending dates.

5. CHA may process an interim adjustment in rent if at an annual or interim re-certification a resident misrepresents the facts upon which the rent is based.

6. Complete justification and verification of the circumstances applicable to rent adjustments must be documented by the resident **[24 CFR § 960.209 (b)]**.

## G. Applying Changes in Rent[14]

Rent increases and decreases will be applied in accordance with the following chart.

**Applying Changes in Rent**

14 This policy on increases and decreases will be effective subject to subsequent revisions of the lease.

| | Timely Reporting | Untimely Reporting |
|---|---|---|
| **Decrease** | Rent decrease begins the 1st of the month following reported to the property manager | Rent decrease begins the 1st month following report to the property manager with no right to rent credits for prior months that the decrease in income was not reported. |
| **Increase** | Rent increase begins the 1st of the month following 60 days since income increased and was reported to the property manager. | Rent increase begins the 1st of the month after the increase was reported to the property manager to include retroactive charges. |

## H. Notice of Rent Adjustment

Residents will be sent a Notice of Rent Adjustment prior to any adjustment in rent. This notice will list the current rent, the new rent, and the effective date of the rent adjustment in accordance with G above. Rent may be adjusted as a result of an annual re-certification, an interim re-certification, or when a change in policies affects the rent calculation (i.e. annual update of ceiling rent).

## I. Failure to Report Accurate Information

If a resident disagrees with rent adjustment they have a right to request a hearing under the CHA's grievance procedures. If the CHA discovers that a resident has misrepresented or failed to report to property management the facts upon which his/her rent is based so that the rent being paid is less than what should have been charged, then the increase in rent will be made retroactive to the first of the month following the month in which the misrepresentation occurred. Failure to report accurate information is also grounds for initiating eviction proceedings in accordance with CHA's dwelling lease **[24 CFR § 966.4 (c) (2)]**.

## J. Remaining Family Members and Prior Debt

1. If the head(s) of household moves out of a leased unit and the family members want to continue occupancy of that unit (or another CHA unit of the appropriate bedroom size), the remaining family members must identify a new head(s) of household who will be subject to suitability and eligibility requirements. Once approved by the Occupancy Department and any outstanding debt is paid, the new head(s) of household will sign a CHA Residential Lease.

2. Any outstanding debt owed to CHA by the former head(s) of household will be addressed as follows:

   a) If the debt cannot be collected from the former head(s) of household (death, incarceration, hospitalization), as a party to the lease, remaining

adult family members 18 years of age or older will be responsible for arrearages incurred by the former head(s) of household.

b) The CHA will not hold remaining family members responsible for any portion of the arrearage incurred prior to the remaining member attaining age 18. (E.g. The new head of the household and only adult member of household recently turned 18 years. The new head of household is not responsible for the portion of the debt owed prior to his/her 18th birthday.)

c) Although the CHA requires the remaining adult family member 18 or older to be responsible for the uncollected debt of the former head of the household, the CHA will enter into a payment plan with the remaining adult family member. The property manager may also waive the repayment requirement based on hardship. (E.g. Significant other debt owed for medical treatment or disability.)

d) When disputes arise between a resident and the CHA concerning an action taken by the CHA to collect a prior debt as outlined in this paragraph, residents will have the opportunity to resolve this dispute through a grievance hearing according to the CHA's *Resident Grievance Procedures* (Appendix E) **[24 CFR § 966.50]**.

**K. Adding a New Head of Household to Lease**

a) Except as required above in section J., a new head(s) of household added to the Lease will not be charged for any arrearage incurred by the former head(s) of household.

b) If the Lease held by the new head(s) of the household is an extension of occupancy under a prior lease(s) with the CHA, any amounts due under the prior lease(s) may be charged and collected as if the amounts were incurred under the current lease (debt follows the head(s) of the household).

**L.** There will be no decreases in income due to failure of the resident to comply with TANF. (See Section XII.D. for requirements.)

## IX. Lease Termination Procedures

The CHA will process lease terminations in accordance to applicable HUD regulations and Section 14 of the *Residential Lease Agreement and Contract* (Appendix D) [24 CFR § 966.4 (l)(2)].

### A. Record Keeping Requirements

A written record of every lease termination and/or eviction shall be maintained by the CHA, and shall contain the following information:

1. Name of resident, number and identification of unit occupied;

2. Date of the Notice of Lease Termination and any other notices required by State or local law; these notices may be on the same form and will run concurrently;

3. Specific reason(s) for the Notices, the section of the lease violated, and other facts pertinent to the issuing of the Notices described in detail;

4. Date and method of notifying resident;

5. Previous notices warning residents of actions or behavioral problems that rise to the level of a lease violation. A summary of any conference held with the resident, including dates, names of conference participants, and conclusions shall also be included; and

6. Copies of notices, forms, or reports documenting resident actions or behavioral problems that may singularly or cumulatively lead to a determination of lease violation(s). (Examples: Requests for Termination, 14-day Notices, HQS Inspection Forms, etc.)

## B. Grievance

**1.** When disputes arise between a resident and the CHA concerning an action or failure to act in accordance with the Residential Lease Agreement and Contract, residents will have the opportunity to resolve this dispute through a grievance hearing according to CHA's *Grievance Procedures* (Appendix E) **[24 CFR § 966.50].**

2. Grievance procedures will not apply to eviction or termination of tenancy cases involving **any activity** that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents or CHA employees; or any drug-related criminal activity on or off CHA property **[42 USC § 1437 d (k) (6)].**

3. For the purposes of verifying the conduct of a leaseholder, the CHA shall maintain on file copies of the following:

a) CHA documentation of re-certification(s), Unit Inspection(s), and a Resident Historical Log;

b) Any CHA Request for Termination, Notice of Lease Termination, 14-day Notice of Eviction, or Resident Petitions for Grievance Hearing; and

c) Confidential information from drug rehabilitation centers or law enforcement agencies will be placed in a sealed envelope and maintained in a separate secured file cabinet. This applies to both applicant and resident files.

## X. Utilities

In some of the CHA's developments residents pay the cost of utilities directly to the supplier of utilities ("Resident Paid Utilities"). When this is the case, resident rents are reduced by an Allowance for Utilities that is developed by the CHA in consultation with the utility supplier and reviewed by HUD **[24 CFR §§ 965.501 et seq., 966.4(b)(2)].**

### A. Resident-Paid Utilities

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

1. Paying the utility bill is the resident's obligation under the CHA's lease. Failure to pay utilities is grounds for eviction.

2. If a resident or applicant is unable to get utilities connected because of a previous balance owed to the utility company at a prior address, the resident or applicant will not be permitted to move into a unit with resident-paid utilities.

3. When a resident submits an application for utility service in his/her own name, the resident must sign a third-party notification agreement so that CHA will be notified if the resident fails to pay the utility bill.

4. In developments with resident-paid utilities, residents with Total Resident Payments that are less than the applicable utility allowance for the unit will be entitled to have a utility reimbursement paid by the CHA. Utility reimbursements are equal to the difference between the TTP and the Allowance for Utilities.

### B. Excess Utility Charges

The CHA has an established allowance (usage) schedule for units where CHA pays the utilities. If resident usage exceeds this allowance, a charge shall be applied as specified in Section 2 of the *Residential Lease Agreement and Contract* (Appendix D). Residents who own and operate large appliances such as air conditioners or chest freezers may exceed the CHA utility allowance for their unit and are responsible for any additional utility cost **[24 CFR § 966.4 (b) (2)].**

### C. Reasonable Accommodations

Residents who need special equipment or appliance(s) because of a verified disability will have their utility allowances increased to cover the additional costs of installing and operating the equipment or appliance (when they pay the utility company directly) or shall not be charged an Excess Utility Charge for operating the equipment or appliance.

### D. See Section XII.F. for utility allowance.

## XI. Ceiling/Flat/Minimum Rents

**A.** The CHA retains the option to establish ceiling rents for all dwelling units in a particular development, for one or more classes of units under management (i.e. all three bedroom units), or inventory wide. The CHA also retains the option to establish flat rents owned and operated by the CHA and to establish a minimum rent applicable to all families

**B.** Ceiling rents for a class of units will be based on the unit type, size, location or some other characteristic that is unit-based. Ceiling rents will not be lower than the units' allocable share of the operating costs.

**C.** Flat rents

1) will be based on the actual market value of the unit;
2) will be designed not to create a disincentive for continued residency by families who are attempting to become economically self-sufficient;
3) may be less than the units' allocable share of the operating costs; and
4) will vary by unit size and type and also by development location.

All residents will be offered the choice of paying either an income-based rent or a flat rent. Ceiling and flat rents are not resident based, that is, applicable to particular families because of their personal circumstances. Rather ceiling and flat rents will be based on the characteristics of the dwelling units occupied. The CHA retains the right to revoke or raise ceiling and/or flat rents at any time after giving reasonable notice to the affected residents. [Title V of H.R. 4194 (Quality Housing and Work Responsibility Act) §§ 507 and 523].

**D. Calculating Ceiling Rents**

Ceiling rents will be calculated according to procedures established by HUD. Ceiling rents cannot be lower than the total average monthly amount for operating expenses applicable to a unit (TAMA).

1. The CHA adopts a two-tiered ceiling rent schedule. For units currently existing in the housing stock, the ceiling rents are based on the CHA's total average monthly amount (TAMA). For new or replacement housing and rehabbed units, the ceiling rents are based on 80% of the Fair Market Rents (FMR). See Appendix F for procedures.
2. The CHA will review the ceiling rent schedule annually to ensure its appropriateness. Ceiling rents will be adjusted to reflect the most recent Section 8 FMR as published annually by HUD in the Federal Register. The minimum ceiling rent as calculated by the CHA will be adjusted annually to reflect operating expenses as reported on the Statement of Operating Receipts and Expenditures as of the end of the most recent fiscal year.
3. If law permits, CHA may adopt a ceiling rent, which reflects market conditions.

## E. Calculating Flat Rents

Flat rents will be calculated according to procedures established by HUD.

1. The CHA adopts a flat rent for each unit owned and/or operated by the CHA. The amount for the flat rent shall be based on the rental value of the unit as determined by the CHA.

2. The CHA will review the established flat rent annually to ensure its appropriateness. The maximum flat rent as calculated by the CHA will be adjusted annually to reflect operating expenses as reported on the Statement of Operating Receipts and Expenditures as of the end of the most recent fiscal year.

3. Residents shall have the choice at each lease recertification to choose between a rent based on 30% of monthly-adjusted income, or a flat/ceiling rent set for the unit. The CHA will notify the resident in advance of the recalculated rent based on the type of rent the resident elected to use.

4. If during the year, the resident experiences a reduction in income, the resident has the option to switch immediately to an income-based rent for the remainder of the year. (E.g. loss of employment, death in family, medical expenses.)

## F. Minimum Rent

Minimum rent for a CHA unit will be set at $0.

## XII. Definitions and Procedures to be used in Determining Income and Rent

### A. Annual Income [24 CFR § 5.609]

Annual income is the anticipated total income from all sources, including net income derived from assets, received by the family head and spouse (even if temporarily absent) and by each additional family member age 18 years or older including all net income from assets for the 12-month period following the effective date of initial determination or re-examination of income, exclusive of income that is temporary, non-recurring, or sporadic as defined below or is specifically excluded from income by another federal statute. Annual income includes but is not limited to:

1. The full amount before any payroll deductions of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services (See XI.E.3. of this section for the disallowance of earned income);

2. The net income from operation of a business or profession, including any withdrawal of cash or assets from the operation of the business. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining the net income from a business. An allowance for the straight-line depreciation of assets used in a business or profession may be deducted as provided in IRS regulations. Withdrawals of cash or assets will not be considered as income when used to reimburse the family for cash or assets invested in the business;

3. Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for the straight-line depreciation of real or personal property is permitted. Withdrawals of cash or assets will not be considered income when used to reimburse the family for cash or assets invested in the property.

4. Where the family has Net Family Assets in excess of $5,000. Annual Income shall include the <u>greater of</u> the actual income derived from all Net Family Assets or a percentage of the value of such Assets based on the current passbook savings rate as determined by HUD;

5. The full amount of <u>periodic</u> payments received from social security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts: Except that delayed or deferred periodic payment of social security or supplemental security income benefits;

6. Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation, and severance pay. (See Paragraph B.3 of this section concerning treatment of lump-sum additions as family assets);

7. All welfare assistance payments received by or on behalf of any family member. See **[24 CFR § 913.106 (b) (6)]** for welfare rules applicable to "as-paid" States;

8. Periodic and determinable allowances, such as alimony and child support payments, and regular cash contributions or gifts received from persons not residing in the dwelling; and

9. All regular pay, special pay (not including pay for exposure to hostile fire), and allowances of a family member in the Armed Forces.

## A. Items not included in Annual Income [24 CFR § 5. 609]

Annual Income does not include the following:

1. Income from the employment of children (including foster children) under the age of 18 years;

2. Payments received for the care of foster children or foster adults (usually individuals with disabilities, unrelated to the resident family, who are unable to live alone);

3. Lump sum or delayed additions to family assets, such as inheritances, insurance payments, (including payments under health, and accident insurance, and worker's compensation) capital gains, and settlement for personal property losses; (but see paragraphs A.4 and A.5 above if the payments are or will be periodic in nature);

4. Amounts received by the family that are specifically for, or in reimbursement of the cost of medical expenses for any family member including a lump-sum payment or prospective monthly amount for the delayed payment of social security or supplemental security income benefits;

5. Income of a live-in aide, provided the person meets the definition of a live-in aide (See Section XII of this policy);

6. The full amount of student financial assistance paid directly to the student or the educational institution;

7. The special pay to a family member serving in the Armed Forces who is exposed to hostile fire;

8. Amounts received by a person with disabilities that are disregarded for a limited time for purposes of Supplemental Security Income and benefits that are set aside for use under a Plan to Attain Self-Sufficiency (PASS);

9. Amounts received by a participant in other publicly assisted programs which are specifically for, or in reimbursement of, out-of-pocket expenses incurred (i.e. special equipment, clothing, transportation, child care, etc.) to allow participation in a specific program;

10. A resident services stipend. A resident services stipend is a modest amount (not to exceed $200/month per person) received by a CHA resident for performing a service for the CHA, on a part-time basis, that enhances the quality of life in public housing. Such services may include but are not limited to, fire patrol, hall monitoring, lawn maintenance, and resident-initiatives coordination. No resident may receive more than one such stipend at a time (Travel expenses, that are reimbursed to CAC members for traveling to, and from, CAC meetings are not considered stipends or income);

11. Temporary, non-recurring, or sporadic income (including gifts);

12. For all initial determinations and reexamination of income on or after April 23, 1993, reparation payments paid by foreign governments pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;

13. Earnings in excess of $480 for each full-time student 18 years old or older (excluding the head of the household and spouse);

14. Adoption assistance payments in excess of $480 per adopted child;

15. The earnings and benefits approved for an exclusion of income under CHA *Income Disregard Procedures*. (Appendix D) under the U.S. Housing Act of 1937 **[42 U.S.C. 1437 et seq.]**. If the resident is terminated from employment without good cause, the exclusion period shall end;

16. Lump sums representing delayed periodic payments of supplemental security income and social security benefits;

17. Amounts received by the family in the form of refunds or rebates under state or local law for property taxes paid on the dwelling unit;

18. Amounts paid by a State agency to a family with a developmentally disabled family member living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home;

19. Amounts specifically excluded by any other Federal Statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under the United States Housing Act of 1937. (A notice will be published by HUD in the Federal Register identifying the benefits that qualify for this exclusion. Updates will be published and distributed when

necessary). The following is a list of benefits excluded by other Federal Statute as of 3 **August 1993 [(R Vol. 58, #147)**:

**a)** The value of the allotment provided to an eligible household for coupons under the Food Stamp Act of 1977 **[7 USC § 2017];**

b) Payments to volunteers under the Domestic Volunteer Service Act of 1973 **[42 USC § 5044]**. Examples of programs under this Act include but are not limited to:

(1) Retired Senior Volunteer Program (RSVP), Foster Grandparent Program (FGP), Senior Companion Program (SCP), and the Older American Committee Service Program;

(2) National Volunteer Antipoverty Programs such as VISTA, Peace Corps, Service Learning Program, and Special Volunteer Programs;

(3) Small Business Administration Programs such as the National Volunteer Program to Assist Small Business and Promote Volunteer Service to Persons with Business Experience, Service Corps of Retired Executives (SCORE), and Active Corps of Executives (ACE);

c) Payments received under the Alaska Native Claims Settlement Act **[43 USC 1626 (a)]**;

d) Income derived from certain sub-marginal land of the United States that is held in trust for certain Indian tribes **[25 USC 459e]**;

e) Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program **[42 USC 8624 (f)]**;

f) Payments received under programs funded in whole or in part under the Job Training Partnership Act **[29 USC 1552 (b)]**;

g) Income derived from the disposition of funds of the Grand River Band of Ottawa Indians **[Pub. L. 94-540, 90 Stat 2503-04]**;

h) The first $2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the Court of, or from funds held in trust for an Indian Tribe by the Secretary of Interior Claims **[25 USC § 1407, 1408 and 25 USC 117(b), 1407]**;

i) Amounts of scholarships funded under Title IV of the Higher Education Act of 1965 including awards under the Federal work-study program or under the Bureau of Indian Affairs student assistance programs **[20 USC 1087 uu]**. Examples of Title IV programs include but are not limited to: Basic Educational Opportunity Grants (Pell Grants), Supplemental Opportunity Grants, State Student Incentive Grants, College Work Study, and Byrd Scholarships;

j) Payments received from programs funded under Title V of the Older Americans Act of 1965 **[42 USC § 3056]**. Examples of programs under this

act include but are not limited to: Senior Community Services Employment Program (CSEP), National Caucus Center on the Black Aged, National Urban League, Association National Pro Personas Mayores, National Council on Aging, American Association of Retired Persons, National Council on Senior Citizens, and Green Thumb;

k) Payments received after January 1, 1989 from the Agent Orange Settlement Fund or any other fund established in the *In Re Orange* product liability litigation, **M.D.L. No 381 (E.D.N.Y.)**;

l) Payments received under the Maine Indian Claims Settlement Act of 1980 **[Pub. L. 96-420, 94 Stat. 1785]**;

m) The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990 **[42 USC 9858q]**; and

n) Earned income tax credit refund payments received on or after January 1, 1991 **[26 USC 32 (j)]**.

o) 20. Additional income earned as a result of participation in qualifying job training, FSS, or employment (See Income Disregard Procedures, Appendix D).

## C. Anticipating Annual Income [24 CFR § 5.609]

If it is not feasible to anticipate income for a 12-month period, the CHA may use the annualized income anticipated for a shorter period, subject to an Interim Adjustment at the end of the shorter period or historical income data to project income. (This method would be used for teachers who are only paid for 9 months or for residents receiving unemployment compensation.)

## D. Decrease in Income for Failure to Comply

D

1. If the welfare or public assistance benefits of a covered family are reduced under a federal, state, or local law because of any failure of any member of the family to comply with the conditions under the assistance program requiring participation in an economic self sufficiency program or imposing a work activities requirement, or due to any fraudulent claim, the families monthly contribution toward rent may not be decreased during the period of reduction, to the extent that the decrease in income is a result of the benefits reduction. **[Quality Housing and Work Responsibility Act, § 512 (d)(2)(A) ].**

2. For purposes of this subsection, ‘covered family’ means a family that receives benefits for welfare or public assistance from a state or other public agency under a program for which the federal, state, or local law relating to the program

requires, as a condition of eligibility for assistance under the program, participation of a member of the family in an economic self-sufficiency program. [ § 512 (d)(1) ].

3. The CHA will not decrease a covered family's income for failure to comply until the CHA receives written notification from the welfare or public assistance agency that the family's benefits have been reduced, and the extent of the reduction, because of noncompliance or fraud [ § 512 (d)(4) ] and the CHA notifies the family of the decision of noncompliance [ § 512 (c)(3)(C) ].

4. Affected residents have the right to an administrative review of any such decision through the CHA's Grievance Procedures but they must first exercise any rights they may have under federal, state or local law which allow them to challenge the decision of noncompliance made by the welfare or public assistance agency. The affected resident must submit written notification to their housing manager of their intent to challenge the decision of noncompliance made by the welfare or public assistance agency within ten (10) days after the CHA notified them of the welfare or public assistance agency's decision of noncompliance.

5. If the affected resident challenges the decision of noncompliance, the resident's rent will not be reduced until the challenge process under federal, state or local law and through CHA's Grievance Procedures is complete. If, after the challenge process is completed, the decision of noncompliance has not been changed, the resident shall be retroactively charged the full amount of rent based upon income received from the welfare or public assistance agency (prior rent payment**)**.

6. The CHA housing manager and the CHA hearing officer who conduct the informal and formal grievance hearing may take the decision made by the administrative agency or court on the affected resident's challenge made under federal, state or local law into consideration, but the CHA housing manager or CHA hearing officer are not required to make the same decision as the administrative agency or court.

## E. Adjusted Income [24 CFR § 5.611]

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

1. **For All Families**

   a) **Child Care Expenses** — A deduction of amounts anticipated to be paid by the family for the care of children under 13 years of age or children with disabilities under the age of 18 for which annual income is computed. But, <u>only</u> when such care is necessary to enable a family member to be gainfully employed or to further his/her education. Amounts deducted must be unreimbursed expenses and shall not exceed:

(1) the amount of income earned by the family member released to work; or

(2) an amount determined to be reasonable by CHA when the expense is incurred to permit education.

b) **Dependent Deduction** — An exemption of $480 for each member of the family residing in the household (other than the head of household, or spouse, Live-in Aide, or foster child) who is under eighteen years of age or who is eighteen years of age or older and disabled, or a full-time student. (See definition of full-time student)

c) **Work-related Disability Expenses** — a deduction of unreimbursed amounts paid for attendant care or auxiliary apparatus expenses for family members with disabilities where such expenses are necessary to permit a family member(s), including member with disabilities, to be employed. In no event may the amount of the deduction exceed the employment income earned by the family member(s) freed to work.

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

(2) For non-elderly families and elderly families without medical expenses: the amount of the deduction equals the cost of all unreimbursed expenses for personal assistance care for persons with disabilities and equipment less three percent of Annual Income, provided the amount so calculated does not exceed the employment income earned.

(3) For elderly families with medical expenses: the amount of the deduction equals the cost of all unreimbursed expenses for personal attendant care for persons with disabilities and equipment less three percent of Annual Income (provided the amount so calculated does not exceed the employment income earned) PLUS medical expenses as defined below.

d) Child Support Payments – Any payment made by a member of the family for the support and maintenance of any child who does not reside in the household, except that the amount excluded under this clause may not exceed $480 for each child for whom such payment is made. **This deduction will be dependent upon whether Congress approves a subsidy to offset the loss of income due to this deduction.**

e) Spousal Support Expenses - Any payment made by a member of the family for the support and maintenance of any spouse or former spouse who does not reside in the household, except that the amount excluded under this clause shall not exceed the lesser of (1) the amount that such a family member has a legal obligation to pay, or (2) $550 for each individual for whom such payment is made.

**This deduction will be dependent upon whether Congress approves a subsidy to offset the loss of income due to this deduction.**

2. **For elderly and families with disabilities only**

a) **Medical Expense Deduction** — A deduction of unreimbursed Medical Expenses, including insurance premiums, anticipated for the period for which Annual Income is computed [Title V of H.R. 4194 (Quality Housing and Work Responsibility Act) § 508]. Medical expenses include but are not limited to: services of physicians and other health care professionals, services of health care facilities, insurance premiums (including the cost of Medicare), prescription and non-prescription medicines, transportation to and from treatment, dental expenses, eyeglasses, hearing aids and batteries, attendant care (unrelated to employment of family members), and payments on accumulated medical bills. To be considered by CHA for the purpose of determining a deduction from income the expenses claimed must be verifiable.

(1) For families without disability expenses: The amount of the deduction shall equal total medical expenses less three percent of annual income.

(2) For families with both disability and medical expenses: the amount of the deduction is calculated as described in paragraph 1.b) above.

b) Elderly/Disabled Household Exemption – An exemption of $400 per household, see Definitions in the next section.

3. **For families with employment income only**[15]:

**Disallowance of Earned Income from Rent Determinations**

a) **General** - The rent payable by eligible families may not be increased as a result of increased income due to employment or program beginning on the date on which employment or program participation commenced [Title V of H.R. 4194 (Quality Housing and Work Responsibility Act) § 508; 310 ILCS 10/8.22(ii)]. (See Income Disregard Provisions Table listed below for further explanation.)

b) **Phase in of Rent Increases** – Upon expiration of the income disregard period described in paragraph a), the rent payable by an eligible family may be increased due to the continued employment or program participation of the family member, except that during the 12 month period beginning upon such expiration, the amount of increase may not be greater than 50% of the amount of the

15 The Continuing Resolution and the Appropriations Act of 1996 permits PHAs to adopt optional deductions related to earned income.

total rent increase that would be applicable but for this paragraph. (This section is effective 10/1/99).

c) **Eligible Families** – Includes families that:

(1) Occupy a dwelling unit in a CHA development and whose income increases as a result of employment of a family member who was previously unemployed for six months or more (State Law) or twelve months or more (Federal Law); or

(2) Whose earned income increases during the participation of a family member in any family self-sufficiency or other job training program or who is or was within six months assisted under any state program for temporary assistance for needy families and whose earned income increases. This includes the training of a family member as resident management staff.

## DISALLOWANCE OF EARNED INCOME

| **Training** | **Federal Law** | **State Law** |
|---|---|---|
| Types of Programs | Training or Family Self-Sufficiency Programs | N/A |
| Duration of income disregard | Lasts for the duration of training program | N/A |
| **Employment** | | |
| Prerequisite | Unemployed for 12 consecutive months prior to employment | Unemployed 6 consecutive months prior to employment |
| Duration of income disregard | For the first 12 consecutive months of employment | For the first 18 consecutive months of employment |
| Additional provisions after employment income disregard period ends | Resident pays only 50% of increase in rent for next 12 months. | Resident pays only 50% of increase in rent for next 12 months. (In accordance with Federal Law, CHA will provide this additional provision as an additional benefit to the resident.) |

d) **Retroactive Eligibility** – Residents with documented participation in an approved training program or qualifying employment as a result of successfully completing a training program or become employed, will be entitled a to retroactive disregard from the date on which training or employment began. However, it is the responsibility of the resident to report changes in income in accordance with the lease provisions. See *Income Disregard Procedures* (Appendix D).

e) **I**t is the resident's choice to retain income through disallowance or to have increased rental payments deposited into an escrow savings account for self-sufficiency purposes. In lieu of the disallowance, the CHA may establish a savings account for qualified families by which the CHA will deposit an amount equal to the increase in rent into the account. The family can only withdraw funds for a home purchase, education expenses, a move out of assisted living, or other expenses authorized by the CHA to promote economic self-sufficiency. This section applies to public housing residents only, and to Section 8 assistance recipients if appropriations are made by HUD.

In anticipating annual income, CHA will take into account, where applicable income disregard periods entitled to a resident in accordance with *the Income Disregard Procedures* (Appendix D).

## F. Computing Total Tenant Payment (TTP) and Rent

1. For all families the total resident payment shall be:

**E** a) Income Based Rent, the greater of:

i) 30% of monthly Adjusted Income; or

ii) 10% of unadjusted monthly Annual Income.

b) Unit Based Rent is the lower of:

i) Flat rent; or

ii) Ceiling rent.

2. The total tenant payment shall never be:

a) Less than the Minimum Rent (which is $0 dollars); or

b) More than the Ceiling rent or Flat rent applicable to the unit, whichever is lower.

3. Mixed citizenship families (at least one member of the household is a citizen or has eligible immigration status *and* the household contains at least one non-citizen or person with ineligible immigration status) will pay a pro-rated rent up to the maximum rent. See *Restrictions on Housing Assistance to Non-Citizens Procedures* (Appendix A).

4. The Tenant Rent is equal to the Total Tenant Payment (TTP) minus the Utility Allowance (if any) applicable to the unit. If the Utility Allowance is greater than the Total Tenant Payment, the resident is entitled to a utility reimbursement equal to the difference between the Utility Allowance and the TTP. <u>The CHA will pay this amount to the resident or if the resident chooses the Utility supplier on the resident's behalf</u>. (See Section XII.)

5. The CHA reserves the right to pay utilities directly when the resident shows patterns of irresponsibility in paying utilities in a timely manner. Failure to pay utilities is a lease violation.

## XIII. Definitions of Terms Used in This Statement of Policies

The following are definitions for terms used in this policy:

1. Accessible Dwelling Units – when used with respect to the design, construction or alteration of an **individual dwelling unit**, means that the unit is located on an accessible route and when designed, constructed, altered, or adapted can be approached, entered, and used by individuals with physical disabilities. A unit that is on an accessible route and is adaptable and otherwise in compliance with the standards set forth in **24 CFR §§ 8.32(c), 40.1 et seq. [the Uniform Federal Accessibility Standards]** is "accessible" within the meaning of this paragraph.

   When an individual dwelling unit in an existing facility is being made accessible for use by a specific individual, the unit will be deemed accessible when it provides the accommodation that addresses the level of accessibility needed by that individual.

2. Accessible Facility - means all or any portion of a facility other than an individual dwelling unit used by individuals with physical disabilities **[24 CFR § 8.3].**

3. Accessible Route **-** for persons with a mobility impairment, a continuous unobstructed path that complies with space and reach requirements of the Uniform Federal Accessibility Standards. For persons with hearing or vision impairments, the route need not comply with requirements specific to mobility **[24 CFR § 8.3].**

4. Adaptability **-** the ability to change certain elements in a dwelling unit to accommodate the needs of disabled and non-disabled persons; or ability to meet the needs of persons with different types & degrees of disability **[24 CFR § 8.3].**

5. Admissions Advisory Committee – a committee formed by a development's Local Advisory Council or other resident organization (E.g. co-operative board) which advises the Occupancy Department or property manager in the admissions process. They may interview and review applicants to CHA developments but they may not ask questions already posed by the Occupancy Department.

6. Allocation Plan - the Plan submitted by the CHA and approved by HUD under which the CHA is permitted to designate a building or portion of a building for occupancy by Elderly Families or Disabled Families **[24 CFR § 945].**

7. Alteration - any change in a facility or its permanent fixtures or equipment. It does not include: normal maintenance or repairs, re-roofing, interior decoration or changes to mechanical systems **[24 CFR § 8.3 & § 8.23 (b)].**

8. Applicant - a person or a family that has applied for admission to housing.

9. Area of Operation - the jurisdiction of the CHA as described in State law and the CHA's Articles of Incorporation.

10. Assets - means "cash (including checking accounts), stocks, bonds, savings, equity in real property, or the cash value of life insurance policies. Assets do not include the value of personal property such as furniture, automobiles and household effects." IMPORTANT: See the definition of Net Family Assets, for assets used to compute annual income **[24 CFR § 5.603].**

11. Auxiliary Aids **-** means services or devices that enable persons with impaired sensory, manual, or speaking skills to have an equal opportunity to participate in and enjoy the benefits of programs or activities **[24 CFR § 8.3].**

12. Care attendant - a person that regularly visits the unit of a CHA resident to provide supportive or medical services. Care attendants have their own place of residence (and if requested by CHA must demonstrate separate residence) and do not live in the public housing unit. Care attendants have no rights of tenancy.

13. Citizen - a citizen (by birth or naturalization) or national of the United States **[24 CFR § 5.504].**

14. Co-head of household - a household where two persons are held responsible and accountable for the family.

15. Community Service Requirements - Each adult resident of a public housing development shall either contribute eight (8) hours per month of community service within their community, or participate in an economic self-sufficiency program for eight (8) hours per month. An exemption will be provided for residents who are:
    a) 62 years of age or older;
    b) Blind or otherwise disabled and are unable to comply with the requirement, or the primary caretaker of such an individual;
    c) Engaged in a work activity as provided in the Social Security Act;
    d) Meeting the requirements for being exempted from having to engage in a work activity as provided in the social Security Act; or
    e) Members of a family receiving assistance under a state program funded under the Social Security Act, or under any other Illinois welfare program, and are compliant with that program.

16. Continued Assistance - a mixed family may receive continued housing assistance (full housing benefits instead of pro-rated rent) if: the head of household or spouse has citizenship or eligible immigration status (as of November 29, 1996), and the family composition consists of: the children of the head of household and/or spouse and the parents of head of household and/or spouse **[24 CFR § 5.518].**

17. Dependent - a member of the household, other than head, spouse, sole member, foster child, or Live-in Aide, who is under 18 years of age, 18 years of age or older and a person with a disability; or a full-time student **[24 CFR § 5.603].**

18. Designated Family - means the category of family for whom CHA elects to designate a project (E.g. elderly family in a project designated for elderly families) in accordance with the 1992 Housing Act **[24 CFR § 945.105].**

19. Designated Housing (or designated project) - a project(s), or portion of a project(s) designated for elderly only or for disabled families only in accordance with a HUD approved allocation plan **[24 CFR § 945. 105].**

20. Development - means the whole of one or more residential structures & appurtenant structures, equipment, roads, walks, & parking lots which are covered by a single contract for Federal financial assistance or application for assistance, or are treated as a whole for processing purposes, whether or not located on a common site **[24 CFR § 8.3]**

21. Disability Definitions for Determining Accessibility - The following definition of disability is not intended to be used to determine eligibility for admission to public housing.

The Section 504 definitions of Individual with Disabilities and Qualified Individual with Disabilities are not used to determine program eligibility. Instead, use the definition of Person with Disabilities as defined later in this section in definition 22.

A. Individual with Disabilities Section 504 definition [24 CFR § 8.3]

1) Individual with disabilities means any person who has a physical or mental impairment that:

a) Substantially limits one or more major life activities;

b) Has a record of such an impairment; or

c) Is regarded as having such an impairment.

2) For purposes of housing programs, the term does not include any individual who is an alcoholic or drug abuser whose current use of alcohol or drugs prevents the individual from participating in the program or activity in question, or whose participation, by reason of such current alcohol or drug abuse, would constitute a direct threat to property or the safety of others.

3) Definitional elements:

a) As used in this definition the phrase, “physical or mental impairment” means any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: Neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine; **or**

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

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

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

d) "Is regarded as having an impairment" means:

- Has a physical or mental impairment that does not substantially limit one or more major life activities but that is treated by a recipient as constituting such a limitation;[16]
- Has a physical or mental impairment that substantially limits one or more major life activities only as result of the attitudes of others toward such impairment; or
- Has none of the impairments defined in this section but is treated by a recipient as having such an impairment.

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

f) The 504 definition of an individual with disabilities is a civil rights definition. To be considered for admission to public housing a person must meet the program definition of a person with disabilities found in this section.

B. Individuals with Disabilities, Section 504

**F** A qualified individual with disabilities means an individual with disabilities who <u>meets the essential eligibility requirements</u> and who can achieve the purpose of the program or activity <u>without modifications</u> in the program or activity that the recipient (CHA) can demonstrate would result in a fundamental alteration in the nature of the program **[24 CFR § 8.3].**

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

22. Disability Definitions for Determining Eligibility

A. For the purpose of determining eligibility for admission to reside in public housing as a person with a disability, the following definitions apply:

A person with disabilities is defined as follows:

1) One who is:

- Unable to perform any gainful activity because of a medically determinable physical or mental impairment which can result in death or continuously last for not less the 12 months; or Is at least 55 years old and is blind ( as defined in 42 USC 416(i)(1) ) and;
- Because of the blindness, is now unable to perform a gainful activity that he, or she, previously engaged in on a regular basis. ( 42 USC § 423(d) ); **OR**

2) Is determined to have a physical impairment that:

- Is expected to be of long continued and indefinite duration;
- Substantially impedes his / her ability to live independently;
- Is of such a nature that such disability could be improved by more suitable housing conditions. (42 USC 1437a (E)(ii) ); **OR**

3) Has a developmental disability which is a severe, chronic disability of an individual of at least 5 years of age that is attributable to a mental or physical impairment, or impairments, which started before he/she reached 22 years old and is likely to continue indefinitely and results in substantial functional limitations in three, or more, of the following major life areas:

- self-care;
- receptive and expressive language;
- learning;
- mobility;
- self-direction;
- capacity for independent living;
- economic self-sufficiency; and
- reflects the individual's need for special or generic services, supports or other services which will extend for his/her life or for an extended duration except that, for individuals between infancy and five years of age, who have developmental delay or congenital conditions which will likely result in developmental disabilities if services are not provided. (42 USC 6001(8) ).

4) Subsections 1, 2, and 3, are not intended to exclude persons who have the disease of acquired immunodeficiency syndrome or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome.

5) Notwithstanding subsections 1-4 and any other provision of the law, no individual shall be considered a person with disabilities, for purposes of eligibility for low-income housing under 42 USC § 1437a, solely on the basis of any drug or alcohol dependence.

a) An applicant will be ineligible for admission to the CHA as a disabled person if his/her only disability is drug or alcohol addiction /dependence.

b) If an applicant has an impairment, or impairments, in addition to drug or alcohol addiction, in order for the applicant to be eligible for admission as a disabled person the additional impairment, or impairments, must be disabling independent of the drug or alcohol addiction.

23. Disabled Family - means a family whose head, spouse, or sole member is a person with disabilities; or two or more persons with disabilities living together; or one or more persons with disabilities living with one or more live-in aides **[24 CFR 5.403(b)].**

24. Displaced Person - means a family in which each member, or whose sole member is a person displaced by governmental action, or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal disaster relief laws **[24 CFR 5.403(b)]**. For purposes of redevelopment activities, a family may also be displaced as defined in the Uniform Relocation Act. Such families have been displaced if they have been required to permanently move from real property for the rehabilitation or demolition of such real property. These families may be entitled to special benefits under the Uniform Relocation Act **[49 CFR § 24.2 (g)].**

25. Divestiture Income - imputed income from assets disposed of by applicant or resident in the last two years at less than fair market value. (See the definition of Net Family Assets in this section.)

26. Drug Related Criminal Activity – means the illegal manufacture, sale, distribution, use, or possession of controlled substances with intent to manufacture, sell, distribute, or use a controlled substance or drug paraphernalia on or off CHA property/premises.

27. Elderly Family - means a family whose head, spouse, or sole member is a person who is at least 62 years of age; or two or more persons who are at least 62 years of age living together; or one or more persons who are at least 62 years of age living with one or more live-in aides.

28. Elderly Person - a person who is at least 62 years of age **[24 CFR § 945.105].**

29. Eligible Immigration Status - For non-citizens, the proof of eligible immigration status consists of a signed certification of eligible immigration status and the original copy of an acceptable INS document. Examples: Alien Registration Receipt Card (for permanent resident aliens), Arrival-Departure Record, Temporary Resident Card, Employment

Authorization Card, or a receipt from INS for a replacement document for one of the above listed categories **[24 CFR § 5.508].**

30. Family - One or more persons (with or without children) regularly living together, related by blood, marriage, adoption, guardianship or operation of the law who will live together in CHA housing. Or two or more persons who are not so related, but can verify shared income or resources who will live together in CHA housing.

    This definition includes but is not limited to:

    a) A family with or without children (the temporary absence of a child from the home due to placement in foster care shall not be considered in determining family composition and family size);
    b) An elderly family;
    c) A near-elderly family;
    d) A disabled family;
    e) A displaced family;
    f) The remaining member of a resident family; or
    g) A single person who is not an elderly or displaced person with disabilities, or the remaining member of a resident family **[24 CFR § 5.403 (b)].**

31. Full-Time Student - a person who is carrying a subject load that is considered full-time for day students under the standards and practices of the educational institution attended. Educational institution shall include but not be limited to: college, university, secondary school, vocational school, or trade school **[24 CFR § 5.603].**

32. Head of the Household - means the family member (identified by the family) who is held responsible and accountable for the family.

33. Kinship care - an arrangement in which a relative or non-relative becomes the primary caregiver for a child or children but is not the biological parent of the child or children. The primary caregiver need not have legal custody of such child or children to be a kinship caregiver under this definition. (Definition provided by the Kinship Care Project, National Association for Public Interest Law).

34. Live-in Aide - a person who resides with an elderly person(s) or person(s) with disabilities and who: is determined by CHA to be essential to the care and well being of the person(s); is not obligated to support the family member; would not be living in the unit except to provide the necessary supportive services; and submits verification of qualifications or certification as a live-in aide by a social worker or health care provider **[24 CFR § 5.403]**.

35. Low-Income Household - a family whose annual income does not exceed 80 percent of the median income for the area as determined by HUD with adjustments for smaller and larger families **[24 CFR § 5.603]**.

36. Medical Expense Allowance - for purposes of calculating adjusted income for elderly or disabled families only, medical expenses mean the medical expense in excess of 3% of Annual Income, when these expenses are not compensated for or covered by insurance **[24 CFR § 5.603]**.

37. Minor - A minor is a person less than 18 years of age. An unborn child will not be considered as a minor. (See definition of dependent.) Some minors are permitted to execute contracts, such as the CHA *Residential Lease Agreement and Contract* (Appendix D), provided a court declares them "emancipated."

38. Mitigating Circumstances Review Panel – this panel reviews the cases of applicants who refute negative information that likely will result in the rejection of their application for housing.

39. Mixed Family - a family whose members include those with citizenship or eligible immigration status, and those without citizenship or eligible immigration status. Mixed families are eligible for housing assistance based on a pro-rated rent **[24 CFR § 5.504].**

40. Mixed Population Housing Development - means a public housing development for elderly and families with disabilities. The CHA is not required to designate this type of project under 24 CFR 945 or prepare an allocation plan **[24 CFR § 945.105].**

41. Multifamily Housing Development - for purposes of Section 504, means a project containing **five or more** dwelling units **[24 CFR § 8.3].**

42. National - person who owes permanent allegiance to the United States, for example, as a result of birth in a United States territory or possession **[24 CFR § 5.504].**

43. Near-elderly family - means a family whose head, spouse, or sole member is at least 50 years of age but below the age of 62, who may be a person with disabilities; or two or more persons who are at least 50 years of age but below the age of 62 living together; or one or more persons who are at least 50 years of age but below the age of 62 living with one or more live-in aides.

44. Near-elderly person - means a person who is at least 50 years of age but below 62, who may be a person with a disability **[24 CFR § 945.105].**

45. Net Family Assets **[24 CFR § 5.603 and 24 CFR § 5.609]** - the net cash value, after deducting reasonable costs that would be incurred in disposing of:
    a) Real property (land, houses, mobile homes);
    b) Savings (CDs, IRA or KEOGH accounts, checking and savings accounts, precious metals);
    c) Cash value of whole life insurance policies;
    d) Stocks and bonds (mutual funds, corporate bonds, savings bonds);
    e) Other forms of capital investments (business equipment);

f) Net cash value is determined by subtracting the reasonable costs likely to be incurred in selling or disposing of an asset from the market value of the asset. Examples of such costs are: brokerage or legal fees, settlement costs for real property, or penalties for withdrawing saving funds before maturity;

g) Net Family assets also include the amount in excess of any consideration received for assets disposed of by an applicant or resident for less than fair market value during the two years preceding the date of the initial application or re-examination. This does not apply to assets transferred as the result of a foreclosure or bankruptcy sale; and

h) In the case of a disposition as part of a separation or divorce settlement, the disposition will not be considered to be less than fair market value if the applicant or resident receives important considerations not measurable in dollar terms **[24 CFR § 5.603]**.

46. Portion of development - includes, one or more buildings in a multi-building project; one or more floors of a project or projects; a certain number of dwelling units in a project or projects **[24 CFR § 945.105].**

47. Pro-rated Rent - Calculated by subtracting the Total Resident Payment (TTP) from the Maximum Rent. The result is the family maximum subsidy. Divide the family maximum subsidy by the number of household members. This is the member maximum subsidy. Multiply the member maximum subsidy by the number of family members with citizenship or eligible immigration status. This is the eligible subsidy. Subtract the eligible subsidy from the maximum rent to arrive at the family's rent **[24 CFR § 5.520].** See *Restrictions on Assistance to Non-Citizens Policy*, (Appendix A).

48. Refusal of Housing- an applicant's choice not to accept a CHA housing offer without good cause.

49. Rejection of Housing- CHA's determination not to admit an applicant either because of ineligibility or failing of the applicant screening.

50. Service Provider - means a person or organization qualified and experienced in the provision of supportive services, and that is in compliance with any licensing requirements imposed by State or local law for the type of service to be provided. The service provider may provide the service on either a for-profit or not-for-profit basis **[24 CFR § 945.105].**

51. Single Person - means a person who lives alone or intends to live alone, who is not an elderly person, a person with disabilities, a displaced person, a near-elderly person, or the remaining member of a resident family.

52. Spouse - means the husband or wife of the head of the household.

53. Standard Permanent Replacement Housing **[24 CFR 5.420(a)(2)(I), (a)(2)(ii)]** – such housing is:

a) Decent, safe and sanitary;

b) Adequate for the family size;

c) Occupied pursuant to a lease or occupancy agreement; and

d) Does not include a transient facility such as a motel, hotel, or temporary shelter for victims of domestic violence or homeless families. In the case of domestic violence, the term does not include the housing unit, which the applicant's spouse or other member shared with the person who engaged in the violence.

54. Supportive Services - means services available to persons residing in a development, requested by disabled families and for which there is a need. The term may include, but is not limited to, meal services, health-related services, mental health services, services for non-medical counseling, meals, transportation, personal care, bathing, toileting, housekeeping, chore assistance, safety, group and socialization activities, assistance with medications (in accordance with State law), case management, and personal emergency **[24 CFR § 945.105].**

55. Supportive Services Plan - The plan describing how CHA will provide or arrange for the provision of the appropriate supportive services per request by families who will occupy the designated housing and who have expressed a need and are eligible for these services. **[24 CFR § 945.205 (b)].**

56. Tenant Rent - The amount payable monthly by the Family as rent to the CHA. Where all utilities (except telephone) and other essential housing services are supplied by the CHA, Tenant Rent equals Total Tenant Payment. Where some or all utilities (except telephone) and other essential housing services are not supplied by the CHA and the cost thereof is not included in the amount paid as rent, Tenant Rent equals Total Tenant Payment less the Utility Allowance **[24 CFR § 5.603]**.

57. Total Tenant Payment (TTP) - The portion of rent that is based on a resident's income. The greater of 30% of the Monthly Adjusted Income (as defined in these polices) or 10% of the monthly Annual Income (as defined in these policies) or Welfare Rent, but never less than the Minimum Rent. If the Resident pays the utilities, the amount of the Utility Allowance is deducted from the TTP. See the definition for Tenant Rent. **[24 CFR § 5.613]**.

58. Uniform Federal Accessibility Standards - Standards for the accessible design, construction, and alteration of publicly owned facilities including residential structures. The standards are used to ensure that buildings and facilities are readily accessible to and usable by persons with disabilities. The standards are set forth in **Appendix A to 24 CFR § Part 40**. See cross-reference in 504 regulations **[24 CFR § 8.32 (a)]**.

59. Utilities - means water, electricity, gas, other heating, refrigeration and cooking fuels, trash collection, and sewerage services. Telephone service is not included as a utility **[24 CFR § 5.603].**

60. Utility Allowance- a flat monthly amount of money deducted from the Total Tenant Payment for families living in units where utilities are paid by the family directly to the utility company.

61. Utility Reimbursement - means funds that are reimbursed to a resident when the Utility Allowance for a unit exceeds the resident's Total Resident Payment **[24 CFR § 5.603].**

62. Very Low-Income Family - means a family whose Annual Income does not exceed 50 percent of the median Annual Income for the area, with adjustments for smaller and larger families, as determined by the Secretary of Housing and Urban Development **[24 CFR § 5.603]**.

# ADMISSIONS AND OCCUPANCY POLICY

# PROCEDURES

**CHICAGO HOUSING AUTHORITY**
**RESTRICTIONS ON HOUSING ASSISTANCE TO NON-CITIZENS PROCEDURES**

## I. BACKGROUND

Section 214 of the Housing and Community Development Act of 1980 restricts assistance to citizens (including nationals) or non-citizens who have eligible immigration status. HUD implemented the regulations effective on June 19, 1995. CHA will administer the residency rule regulations and apply the provisions of the law equally to all applicants and residents.

Current residents will be notified on the requirements of these procedures before their first annual recertification after August 23, 1996. Individuals and families with pending applications shall be notified as soon as possible.

## II. CURRENT RESIDENTS

Current residents must provide proof of citizenship or eligible immigration status at their next annual recertification. If at that time it is determined that a family or family members do not have eligible immigration status. the provisions of the HUD rule as set forth shall be applied.

**A. Certification.** At the time of their annual recertification after August 23, 1996, all current residents are required to submit evidence of citizenship or eligible immigration status, or to elect not to contend that one has eligible immigration status. The requirement applies to all family members.

1. **Citizen.** For <u>each</u> family member who is a United States citizen, the evidence consists of a signed declaration of U.S. citizenship. This document is signed under penalty of perjury.
2. **Non-citizens 62 Years or Older.** Residents that are not citizens. and are age 62 years or older are required to show proof of age and signed certification of eligible immigration status.
3. **Non-citizen Under the Age of 62.** For non-citizens under the age of 62, the evidence consists of a signed certification of eligible immigration status and the submission of the original of one of the acceptable INS documents: Alien Registration Receipt Card (for permanent resident aliens), Arrival-Departure Record. Temporary Resident Card, Employment Authorization Card or a receipt from INS for a replacement document for one of the above listed categories.
4. **Minors.** Declaration of eligible immigration status also applies to minors. For each minor a certification must be signed by an adult who is residing in the unit and is responsible for the minor.
5. **Family Members Electing Not Claiming Eligible Immigration Status.** For each family member electing not to confirm that he/she has eligible immigration status, the member(s) must be listed separately. A signature

from the individual(s) is optional. However, the head of house or spouse with eligible immigration status must sign and date the list.

**B. Verification.** After an acceptable INS document has been submitted by the applicant and witnessed by the staff, the applicant(s) shall sign a verification consent form which authorizes and INS search to confirm eligible immigration status.

1. Staff shall photocopy the front and the back of the INS document and return the original to the resident.
2. CHA shall verify eligible status in the INS Systematic Alien Verification for Entitlements Program (SAVE). Verification shall not occur unless there is a signed consent form.
3. If the resident refuses to sign the verification consent form, for purposes of determining the housing assistance for the family, the family member shall be considered as not having eligible immigration status.
4. CHA shall request, and the INS shall conduct, a manual secondary check of records in all instances where the SAVE system query' results in an negative response.
5. A resident who submits eligible immigration documentation may not be penalized for delays on part of those entities which must verify eligible immigration status.

**C. Housing Assistance Determination.** For current residents where some or all of the family members do not meet residency requirements (mixed family), housing assistance may be continued or prorated depending on family composition. If it is determined that a family must pay a prorated rent, they are eligible for a deferral of termination of assistance. For current residents where no family member has eligible citizen status. assistance will be terminated, this family is also eligible for a deferral of termination of assistance.

1. **Continued Assistance.** Mixed families where the head of household or spouse is a citizen or has eligible immigration status. and the family consists of only the nuclear family members or other family members with eligible status. are eligible for continued assistance. There shall be no change in the calculation of the total tenant payment based on 30% of the family's income.
2. **Deferral of Termination of Assistance.** Mixed families where the head of household or spouse is a citizen or has eligible immigration status; but non-nuclear members of the household do not have eligible immigration status; or families where no family members have eligible status <u>shall receive a deferral of termination of assistance for six months for a maximum of eighteen months.</u>
   a) The City's Consolidated Plan cites a lack of affordable housing, therefore families are eligible for deferral of termination of assistance. Staff will contact the City annually to determine if there are any changes in the availability of affordable housing.

b) During the deferral period(s) the family's total tenant payment shall continue to be based on 30% of the family's income.

c) Families who have no family members with eligible status are ineligible for housing assistance and must vacate their unit at the end of the deferral period.

d) Mixed families are eligible for pro-ration of assistance at the end of the deferral period.

**3. Pro-ration of Rental Assistance.** A mixed family shall have their housing assistance prorated according to the number of family members who have eligible status after the deferrals set forth in Section II D(2) have expired.

## III. APPLICANTS

Individuals or families applying for housing assistance must provide proof of citizenship or eligible immigration status at their next annual recertification. If at that time. it is determined that the individual, family or family members do not have eligible immigration status. the provisions of the HUD rule as set forth shall be applied.

**A. Certification.** Applicants are required to submit evidence of citizenship or eligible immigration status, or to elect not to contend that one has eligible immigration status.

**1. Citizen.** For <u>each</u> family member who is a United States citizen, the evidence consists of a signed declaration of U.S. citizenship. This document is signed under penalty of perjury.

**2. Non-citizen.** For non-citizens, the evidence consists of a signed certification of eligible immigration status and the submission of the original of one of the acceptable INS documents: Alien Registration Receipt Card (for permanent resident aliens), Arrival-Departure Record, Temporary Resident Card, Employment Authorization Card, or a receipt from INS for a replacement document for one of the above listed categories.

**3. Minors.** Declaration of eligible immigration status also applies to minors. For each minor, a certification must be signed by an adult who is residing in the unit and is responsible for the minor.

**4. Family Members Electing Not to Contend Eligible Immigration Status.** For each family member electing not to confirm that he/she has eligible immigration status, the member(s) must be listed separately. A signature from the individual(s) is optional. However, the head of house or spouse with eligible immigration status must sign and date the list.

**B. Verification.** After an acceptable INS document has been submitted by the applicant and witnessed by the staff, the applicant (s) shall sign a verification consent form which authorizes an INS search to confirm eligible immigration status.

1. Staff shall photocopy the front and the back of the INS document and return the original to the applicant.
2. CHA shall verify eligible status in the INS Systematic Alien Verification for Entitlements Program (SAVE). Verification shall not occur unless there is a signed consent form.
3. If the applicant refuses to sign the verification consent form, for purposes of determining the housing assistance for the family, the family member shall be considered as not having eligible immigration status.
4. CHA shall request, and the INS shall conduct a manual secondary check of records in all instances where the SAVE system query results in an negative response.
5. A resident who submits eligible immigration documentation may not be penalized for delays on part of those entities which must verify eligible immigration status.

**C. Determination of Housing Assistance**. A mixed family's housing assistance will be prorated according to the number of family members who have eligible status.

**D. Families that have no members who are citizens or have eligible immigration status are ineligible for public housing.** The application shall be denied.

## IV. APPEALS

**A. Request for Appeal.** Upon receipt of notification that the INS secondary verification failed to confirm eligible immigration status, CHIA shall notify the family in writing of the results of the INS verification and their option to request an appeal to the INS.

**B. Delay of Assistance.** CHA shall not delay, deny or terminate assistance until the completion of the INS appeal process for applicants or the completion of the INS process and the CHA informal hearing process for current residents.

## V. FAILURE TO SUBMIT EVIDENCE ON FAMILY COMPOSITION OR ELIGIBLE STATUS

**A. One-time Evidence Requirement for Continuing Occupancy.** The family is required to submit evidence of eligible immigration status for each family member only once during continuously-assisted occupancy. Documentation shall be submitted for any new family members(s) at the next annual recertification.

**B. Failure to Submit Evidence or Establish Eligible Immigration Status.** If the family fails to submit the required evidence of citizenship or eligible immigration status, CHA shall terminate the lease or deny the application.

**C. Changes in the Family's Status.** If there is a change in the family composition or the eligible status of a family members that effected the resident rule status of the family, such changes shall be made immediately.

**D. Changes Participation on a HUD Program.** Whenever a family applies for admission to the Section 214 covered program, evidence of eligible immigration status must be submitted unless the family has already submitted the evidence to CHA for a covered program.

## VI. FRAUD

**When Fraud is Suspected with Response to a Declaration of Citizenship.** If CHA receives verifiable information that provides a substantial basis to believe that a resident/applicant may have erroneously or deliberately misrepresented his or her eligibility status and is receiving financial assistance for which he or she may not be eligible, CHA Shall refer the case to the CHA Inspector General for follow up.

**CHICAGO HOUSING AUTHORITY**
**APPLICANT SCREENING PROCEDURES**

## I. THE APPLICATION PROCESS

### A. The Application and Screening Form

1. When completing the registration forms, the applicant will be required to provide answers to certain key questions concerning the applicant's eligibility, preferences, and resident history. Applicants must provide a Social Security Numbers (SSN) for each family member age 6 and over (or certification that applicant does not have a SSN) and the name address and telephone numbers of current and former landlords and past and present housing providers. Applicants must also provide sufficient information to establish citizenship.

2. Failure to provide this information will result in cessation of application processing and possible rejection of the application. CHA staff is available to guide applicants, as needed, in understanding the application process and completing CHA's application and screening forms

**B.** Screening factors used in the application process include, but are not limited to: security and background check credit check, payment history for utility Charges, prior landlord history, and a home visit. Failure to complete or comply with any of these phases will result in rejection.

**C.** CHA staff will complete a Screening Interview Checklist for each application file. If at any point in the screening process it becomes clear to staff that an applicant will not meet the screening criteria, the checklist will be signed and the rejection noted. The same procedure will be followed when applicants are certified acceptable for admission.

### D. Verification Standards for Checking Information Provided By the Applicant

1. Verification by a third party - Verification by third parties must be in writing. An exception may be made at the discretion of CHA to permit phone verification when CHA staff determine from all available information that written verification is impractical, or processing of the application is unnecessarily delayed by the third party's failure to respond. CHA staff, in its discretion, may consider other available information.

2. After CHA completes the screening interview, staff will send a first mailing to the third party verification sources identified by the applicant. After 15 calendar days, if no response has been received to the first mailing, CHA staff will contact the third party by phone, fax, or send a second mailing.

3. After the second mailing, if the third party does not provide either a phone or written verification, CHA will advise the applicant that the third party is not cooperating in the verification process. CHA may ask the applicant to contact the third party directly to speed the verification process. (Applicants will not be given verification forms. All transactions will be between CHA and the third party.)

4. Phone verifications must use the same form previously mailed to the third party. (All the information included in the written verification must be gathered during the phone contact.) The form will be completed by CHA staff. The contact person, date, and time of conversation will be noted and the CHA staff person who made the phone call will sign the form.

5. Review of documents - CHA will review documents submitted by the applicant when:
   a. The information requested does not require third party verification (e.g. rent receipts and lease agreements, utility bills); or
   b. Third party or phone verification is impossible. CHA will copy documents into the applicant's file or list the documents and the information on them.

6. Applicant certification CHA may accept applicant certification only when required by HUD regulations or when other preferred forms of verification are impossible to obtain.

## E. General Procedures Applicable to Verifying Information

1. Information subject to Change - These verifications are valid for 90 day's from the date received by CHA. Information may be updated by phone for an additional 30 days. CHA will not ordinarily rely on verifications that are more than 120 days old.

2. Information not subject to Change - CHA will verify this information only once. (E.g. verification of age with birth certificate.)

3. Each applicant folder will include a File Completion Checklist (Form #___) to track progress and a Verification Log (Form #___) documenting verification efforts. The Verification Log will record the forms sent, date sent, and date information is received by CHA. Upon completion of a folder the CHA staff person will sign the File Completion Checklist and certify as to the completeness of the file. **The File Completion Checklist will also included a recommendation for rejection or admission of the applicant and the signature of CHA staff person responsible for the decision.**

4. Each CHA verification will include the following: (a) explanation of why the information is being requested; (b) a copy of CHA's general release of

information with the applicant's signature or the applicant's signature on the verification form; and (c) the questions essential to soliciting the information required by CHA.

5. CHA will send third party verifications directly to the source, not through applicants. Third party verifications will include a self-addressed stamped envelope for return to CHA. Verifications may also be faxed to a third party with a return fax to CHA provided the original form is later forwarded by mail, and/or the fax transmission is confirmed by printed receipt at the time of transmission, or verified by phone with a notation to the file.

## F. Limited Inquiries Into Medical Issues

1. Nothing in these procedures prohibits CHA from seeking verification of medical information (of a limited nature) presented by an applicant with disabilities who would otherwise be unable to comply with the resident selection criteria. Such medical information is usually offered either to explain mitigating circumstances and/or seek a reasonable accommodation. For example, if an applicant had a poor rental history but stated that the previous history was caused by a disability that is now being successfully treated, CHA will verify:

   a) that the applicant did, in fact, have a disability; and
   b) that the former problems were caused by the disability; and
   c) that the present treatment can reasonably be expected to prevent the recurrence of the problems.

2. If an applicant's former housing problems were due to the applicant's resisting or refusing treatment, CHA would be justified in verifying whether the applicant would be reasonably likely to continue with the current treatment. In this instance, it is not necessary for CHA to obtain medical information beyond verifying the applicant's assertions about the reasons for past problems, the likelihood of continuing treatment and that the treatment will remedy the problem.

## G. Issues Regarding Former Tenancy

1. Conditions of former tenancy may not apply to a current applicant, individual or group, where the new lessee is to be a person other than the former lessee.

2. Any family member who <u>signed</u> a previous lease or occupancy agreement will be considered responsible for the family's former actions. Applicants will be allowed to explain any mitigating circumstances.

3. In cases of criminal activity, including drug related activity; CHA may prohibit the family member engaged in such activity from residency in the CHA unit.

4. At the time of registration CHA will advise the applicant of any outstanding balances owed to CHA (for either Public Housing or Section 8). Amounts must be paid prior to the first interview. Applicants will have no more than 30 days to pay the balance prior to the interview.

5. Should the applicant successfully demonstrate to CHA that a charge is invalid, CHA will reinstate the applicant to the waiting list using the original date and time of application and any applicable preferences.

**H. Documentation of Information Received During the Application Process**

1. CHA will accept credible evidence to verify information received during the application process. (NOTE: Refer to Section XI of these procedures to review specific criteria and requirements)

2. Misrepresentation of eligibility including but not limited to eligibility, award of preference for admission, allowances, family composition, rent during the application process.

   a. If, during the course of processing an application, it becomes evident that an applicant has falsified or otherwise misrepresented any facts about his/her current situation, history, or behavior in a manner that would affect eligibility, highlighter Preferences, applicant selection criteria qualification, allowances or rent, the application shall be rejected.

   b. This provision shall not be applied to minor mistakes (such as a typographical error) in fact that produce no benefit to the applicant.

## III. SECURITY AND BACKGROUND CHECK

**A. CHA will verify any involvement in criminal activity on the part of any applicant family member who intends to reside in the CHA leased premises:**

1. Applicants will be advised at the time of intake and at the start of the screening interview that criminal behavior will jeopardize admission to a CHA community. Criminal activity that occurs while an applicant's family is on CHA's waiting list will receive <u>additional</u> weight in CHA's decision to reject an applicant family.

2. Involvement in criminal activity by any member of an applicant family that would adversely affect the health, safety or welfare of other tenants will be verified using information from the criminal records system of the City of Chicago and State of Illinois. CHA will also examine criminal histories provided by other States or municipalities, court records, and other evidence that might document any criminal activity. In addition, the current and former landlords and housing providers will be asked to indicate problems during the applicant's tenancy.

3. CHA may use a third party service to check criminal history. CHA will also interview the applicant using the interview-screening Checklist.

4. CHA will use the criminal records system of the City of Chicago, State of Illinois, and other states and/or municipalities to check all applicants for any evidence of:

   a. Any and all information relative to any criminal convictions or activity, both felonies and misdemeanors within the past ten years; and
   b. Any and all information relative to any criminal charges which is currently pending before the courts of the State of Illinois or any jurisdiction, including the federal courts.

5. The criminal records system shall be used to assess the applicant's past behavior especially commission of violent crimes, drug related criminal activity of any kind, disturbance of neighbors, or destruction of property.

   a. Without substantial evidence of mitigating circumstances (including seeing jail time and rehabilitation) the CHA will not admit persons engaging in any criminal activity violating state and/or federal law.
      Examples of criminal offenses that will be considered include, but are not limited to: disturbing the peace, drunk and disorderly conduct, threats or harassment, domestic violence, including actual or threatened violence toward members of an applicant household, assaults, destruction of property, vandalism, citations for health and sanitary code violation, possession of an unlawful weapon, criminal damage, arson, and home invasion.

   b. In applying the above provisions, CHA will consider the nature of the offense and mandatory penalties in accordance with state and federal law, including but not limited to the Illinois Habitual Criminals Act.

6. Persons are ineligible for admission into the CHA Public Housing Program if the Authority determines that an applicant or any member of the applicant's household is or was during the three (3) years prior to request for admission, engaged in any drug-related or violent criminal activity which would adversely affect the health, safety, or right to peaceful enjoyment of the premises by other residents, the owner, or employees. Exceptions to this section may be made for applicants who have undergone a successful rehabilitation program, or where the circumstances surrounding the activity no longer exist. After expiration of the three- (3) year period, the CHA may require the applicant, as a condition of admission, to submit to the CHA evidence sufficient to ensure that the individual has not engaged in any criminal activity during the three (3) year period.

7. Documentation of any of the following criminal activities by any applicant

family member who intends to reside in the CHA leased premises may result in rejection of the applicant family. Documentation of such activity may be considered alone or in conjunction with other criminal activity such as:

a. Use, distribution or possession of illegal drugs by an applicant family member who intends to reside in the CHA leased premises.

b. Documentation from the criminal records system or other verification of criminal activity, that shows a history of property related crimes such as burglary, robbery, larceny, weapon charges, and possession and receipt of stolen goods.

c. Documentation from the criminal records system or other verification of criminal activity, that shows a history of crimes that endanger the health or safety of others such as assault, battery, public intoxication (drunk and disorderly), prostitution.

d. Documentation from the criminal records system or other verification of criminal activity that shows a history of crimes that endanger the health or safety of others such as homicide or murder, rape, child molestation, spousal or child abuse, or drug related crimes as referenced.

8. All criminal activity will be weighed against the obligations of tenancy, including the likely impact on a CHA community and the danger to the health or safety of residents or staff. CHA considers certain criminal acts or repeated criminal behavior as evidence that the applicant is not capable of meeting lease requirements.

**B.** In evaluating criminal activity or drug-related criminal activity, CHA will give the greatest weight for admission to applicants with no record of criminal activity or behavior of any kind, minor or infrequent offenses that do not when taken together, indicate the pattern of a repeat offender; or a record of criminal activity with clear and verifiable evidence of improved behavior sustained over a significant period of time. (A period of improved behavior while on the waiting list will also be considered by CHA.)

**C.** Criminal activity, drug related criminal activity, alcohol abuse, other factors and considerations will include:

1. Mitigating circumstances[1] and criminal activity,

[1] Litigating circumstances are facts relating to the applicant's record of unsuitable rental history or behavior which, when verified, would indicate that (1) The reason for the unsuitable rental history and/or behavior; (2) that the reason for the unsuitable rental history and behavior is no longer in effect or is under control; and (3) the applicant's prospect for lease compliance is an acceptable one, justifying admission.

a. Staff will consider the dates, subject to any local criteria, and circumstantial activity, the seriousness of the offense, whether the offense occurred only once or was repeated, and the number and duration of rehabilitation efforts, if any, and whether the offender has avoided subsequent criminal activity or behavior since the offense.

b. With respect to criminal behavior, evidence of any mitigating circumstances or rehabilitation must be compelling and substantial before CHA will consider accepting an applicant with a significant criminal history. CHA will look for a period of time where the applicant's behavior is improved and there is no evidence of criminal activity. CHA will consider the applicant's behavior and reputation in the community both before and after the offense and any other evidence indicating a likelihood that the offender will not engage in any future criminal activity.

c. However, consideration of verifiable mitigating circumstances does not guarantee that an applicant will be admitted. Evidence of certain crimes or repeated crimes can result in rejection. Evidence of mitigating circumstances or evidence of rehabilitation does not require CHA to disregard potentially disqualifying activity. (See the discussion later in these procedures for a review of how mitigating circumstances are considered.)

**D. Drug-related criminal activity:**

1. CHA will not admit a current user of illegal drugs because of the potential for attracting drug- related crime.

2. The Fair Housing Act explicitly states that current users of illegal drugs ARE NOT a protected class (persons with disabilities) and permits CHA to reject such applicants. At the same time CHA may not discriminate against former users of illegal drugs[2] or engage in screening that has a disparate impact on former users of illegal drugs since such persons are members of a protected class - persons with disabilities.

3. Applicants who are former drug users and whose housing histories reveal no circumstances, which point to future, lease compliance problems will be considered for admission. However, if problems with housing or criminal

[2] A former user of illegal drugs is defined by ADA and § 504 as an individual who has successfully completed a supervised drug rehabilitation program and is no longer engaging in the illegal use of drugs or has otherwise been rehabilitated successfully and is no longer engaging in such use, or is participating in a supervised rehabilitation program and is no longer engaging in such use…"

histories emerge during screening or the applicant's on disclosures indicate that the applicant may be a current user of illegal drugs, CHA will require documentation that the applicant is no longer using drugs, including behavioral evidence that the applicant has made a life-style Change. (See below for a discussion of applicants in treatment programs vs. those that have completed treatment.)

4. a. CHA will require an applicant to document that he or she is a former user if objective evidence raises a question about whether the applicant is a current user of illegal drugs. However, demonstrating that a person is not a current user does not automatically guarantee admission. The person with disabilities is still required to meet all other applicable screening criteria.

   b. Where an applicant's documentation from the criminal records system includes numerous drug-related and other crimes (felonies or misdemeanors not necessarily drug related) CHA will weigh current treatment and recovery efforts in light of all criminal activity evidenced by the applicant. (E.g. a former user still engages in criminal activity that is not drug related.) Successful recovery does not mean that CHA will ignore a background of criminal behavior. Demonstrating that an applicant is not a current user is only part of the screening evaluation; all other screening criteria must be met.

5. Documentation that an applicant is not illegally using a controlled substance must include but is not limited to at least one of the following:

   a. Verification from a reliable[3] certified drug treatment counselor or program administrator indicating that the applicant has been in treatment, that there is a reasonable probability that the applicant will be successful in refraining from using illegal drugs, and that the applicant is complying with the program requirements and not currently using a controlled substance;

   b. Verification from a self help program (e.g. Narcotics Anonymous trusted servant) indicating that the applicant has been participating in their program, that there is a reasonable probability that the applicant will be successful in refraining from use of illegal drugs and is not currently using a controlled substance.

   c. Verification from a probation or parole officer that the applicant has met or is meeting the terms of probation or parole with respect to refraining from the illegal use of a controlled illegal substance:

[3] As used here "reliable" means that the CHA will not rely on the expertise of persons who have demonstrated a pattern of providing inaccurate or unreliable information. The CHA is the final judge of what constitutes adequate and credible documentation.

d. A voluntary interview with a substance-abuse screening team made up of local professionals who will indicate that the applicant has a reasonable probability of success in refraining from use of illegal drugs; and,

6. Voluntary drug testing. Testing is an option, not a requirement and several parameters guide an applicant's use of the option;

   a. Drug tests[4] must be conducted at facilities that use the National Institute of Drug Abuse Guidelines (implementing EO 12564 and Pub. L. 100-71; guidelines published 4-11-88 in the Federal Register);

   b. The test must screen for illegal drugs only and applicant's use of prescription drugs that contain controlled substances must be taken into account; and

   c. CHA will pay for all costs associated with drug testing unless the costs are otherwise reimbursed.

7. When an applicant's record indicates that the applicant is in treatment, recently entered treatment (as opposed to successfully completed treatment) or that the applicant has a history of drug treatment followed by recidivism, CHA will:

   a. Require more documentation sufficient to convince a "reasonable person" that the applicant is not a current user of illegal drugs; and

   b. When an applicant has a history of recidivism, enrollment in a program in and of itself will not be sufficient documentation. In addition to any recent enrollment in a treatment program CHA will:

      i. Require the applicant to demonstrate in what way his/her current situation and claim of no drug use is different from previously unsuccessful efforts to stop using drugs. Further, in what way is the applicant's claim of ability to comply with CHA's lease different from any previous unsuccessful efforts to meet the lease or occupancy requirements of other residential programs. CHA must have some demonstration that the likelihood of Change in behavior is significantly greater than in the past.

      ii. Assess current treatment efforts in light of the number of past

[4] Consistent with the ADA §35.131(c) drug testing could be used in combination with the other verifications described in this section to support the applicant's claim that he/she is not now engaging in the current illegal use of drugs.

attempts.

iii. Require the applicant to successfully complete the current treatment program and maintain acceptable behavior in the community for a period recommended by the voluntary substance abuse screening team described above.

8. Alcohol Abuse and Screening Alcohol is a legal drug, so simple use or even abuse of alcohol is not grounds for rejecting an applicant. Further, applicants who are alcoholics are, by definition, disabled, and thus entitled to the protections afforded to all applicants with disabilities.

a. It is CHA's policy that an applicant who is an alcoholic must meet the same screening criteria and standards as any other applicant. If an applicant's housing history demonstrates behavior that would be a lease violation, screening staff will have grounds to reject the application even if the behavior is related to the applicant's alcoholism. An applicant who has an alcohol problem will be treated like every other applicant - CHA's screening will look at the applicant's behavior, not his or her condition/status.

b. If screening reveals past tenancy problems and the applicant asserts that those problems were caused by alcohol abuse that is no longer occurring, staff will verify the information by following procedure;

i. Verifying that the negative behavior was, in fact, caused by alcohol abuse;

ii. Documenting (using methods similar to those described above for former users of illegal drugs) that the applicant is no longer abusing alcohol; and,

ii. Looking at the applicant's housing history since entering recovery to ensure that no other behavior problems still exist.

## IV. REVIEW AND CHECKING OF CREDIT REPORTS

### A. CHA Will Complete a Credit Check on all Public Housing Applicants.

### B. Evaluating Credit History Information

1. CHA will make a careful examination of the credit report. The report will be checked to determine if there are inconsistencies in the applicant's housing history as reported to CHA on the application form or other documents. CHA staff will consider negative credit information in light of its impact on tenancy. Thus, poor credit with respect to non-payment or delinquent payment of utilities will be given greater weight than non-payment or delinquencies for other

consumer obligations.

2. If CHA rejects an applicant because of poor credit history, CHA staff will advise the applicant in the rejection notice of his/her rights under state and federal law to:

   a. Examine the credit report;
   b. Dispute and correct inaccurate credit information. Should the applicant successfully demonstrate to CHA that the credit record is inaccurate and the report is corrected CHA will consider reinstatement to the waiting list using the original date and time of application and any applicable preferences.

3. CHA will consider bad credit in light of any mitigating circumstances that can be documented by the applicant (e.g. loss of job, illness or medical problems that limited a family's financial resources). CHA will also consider whether non-payment or poor payment of rent and other Charges is likely to reoccur once the applicant obtains housing where the rent is calculated based on income.

4. If an applicant has filed bankruptcy and this is reflected in the credit report, CHA will determine if the bankruptcy included debts related to tenancy and shelter costs. Applicants will not be rejected solely on the basis of the bankruptcy filing.

## V. UTILITIES

**A.** CHA will also interview the applicant concerning history of utility payments. Where applicants have had past responsibility for utility payments, CHA will use account records provided by utility companies (excluding those providing telephone and cable TV service. Although these may be used as secondary indicators of ability to pay) or the Utility Verification Form.

### B. Ability to Obtain Utility Connections

1. CHA owns public housing units where the resident is responsible for the utility payments. In accordance with the Admissions and Occupancy Policy and the lease, CHA requires that applicants offered units with resident-paid utilities be able to secure utility service in their name and document same to CHA. Applicants that cannot secure utility services will not be permitted to move into units with resident-paid utilities. Assuming that an applicant in this situation passes screening, CHA will, subject to availability, offer a different unit where CHA pays the utilities.

2. Present ability to obtain utility service is considered an indicator of the applicants past performance in meeting financial obligations.

3. CHA will advise all applicants of the above requirements at initial intake and remind applicants of this requirement at the start of the screening process.

## VI. LANDLORD AND PRIOR RESIDENCES

A. Procedures used to verify applicant information:

1. Staff will interview all applicants using the Applicant Screening Interview Checklist, (Parts I and II. If the current housing provider is a relative, additional information on the applicant's ability to comply with lease terms may be collected by CHA.

2. CHA will examine applicant housing history over the past three years or whichever provides the best information about the ability to pay, obtain the best available information on an applicant's housing history, CHA may use combinations of years and tenancies.

3. CHA will examine tenancy history over a longer period of time when the information obtained from the time period is incomplete. When examining an applicant's shelter history, CHA will focus on those periods where the applicant made sustained periodic payments in support of shelter related costs.

4. Performance in meeting financial obligations will be checked first by contacting the current housing provider, and two prior providers (if applicable) using the CHA Landlord Verification Form. The form will be mailed to the landlord(s) or shelter providers identified by the applicant in the Applicant Screening Interview Checklist along with a release of information form. Where there is no rental history, other forms appropriate to the family's circumstances will be used (see part VI, section C).

5. Checking Landlord Information (Applies to landlord information received for any screening criteria.)

   a. CHA differentiates between applicants who are/were the Tenant of Record (TOR) whose landlord CHA cannot reach and applicants who have lived somewhere without the landlord's knowledge and consent, thus making it impossible for the prior landlord to verify residency or rent payment history.

   b. CHA will attempt to verify that the applicant is the TOR by contacting the landlord. CHA will also accept: a notarized letter from the TOR when the applicant is living in the unit but is not on the lease; other credible references that can verify address and tenancy status for the period under review; and any of the secondary forms of verification described below.

   c. Where a current or previous landlord is a relative of the applicant, CHA will

give more weight to those periods where the applicant lived in a unit provided by a landlord not related to the family.

d. If no landlord references are available, CHA will obtain a credit report and contact the current housing provider with a request that someone with knowledge of the applicant's behavior and rent payment history complete the form.

**B. Record of Eviction From Housing or Involuntary Termination From Residential Programs:**

1. Sources:

a. Staff will check CHA's records, landlord records, and court records to determine whether the applicant has been evicted from CHA, any other assisted housing or any other property in the past. CHA will also use credit or eviction service information to check for a record of eviction.

b. Record of termination from residential programs will be checked with police service agencies and with any provider referred by the applicant. CHA will cross-match with unit records and information in the Section 8 Certificate and Voucher programs to check for termination of assistance.

c. Conditions of former tenancy may not apply to an applicant, individual or group. Any family member who signed a previous lease or occupancy agreement will be considered responsible for the family's former actions.

d. Staff must consider the mitigating circumstances of any past eviction or termination and its relevance to CHA tenancy.

2. Examples of indicators for eviction from housing or involuntary termination from residential programs are:

a. No record of eviction or termination from any shelter, other housing, or a residential program. Evidence of rule compliance in any residential program (shelters, transitional facilities, group homes) or other program in which the applicant is participating (drug treatment).

b. Successful completion of stay and transition from a shelter or residential program.

c. Currently in the program and is meeting all requirements.

d. No negative information received from the housing provider.

e. That the applicant can meet CHA's lease criteria on his/her own or with assistance that the applicant provides; unit or living area is clean, no destruction of property, ability to manage regular monthly payments of some kind; responds to mail and shows up for appointments; follows any applicable rules in his/her current residential situation; no record of disturbing neighbors; avoids criminal activity.

3. Other indicators for this criterion are:

   a. Applicant asked to leave the program for rule violation that is not related to CHA lease compliance. (Example: staying out late might violate a residential program rule but would not violate CHA's lease.)

   b. Applicant leaves program but returns and is accepted for continued participation.

   c. Successful completion of residency training program acceptable to CHA.

**C. Demonstration of Ability and Willingness to Comply with the Terms of CHA's Lease and Other Program Requirements** (Note: Section will be applied ONLY in the absence of satisfactory landlord documentation):

1. If an applicant is able to document that he or she could comply with CHA lease terms as demonstrated in the current and former residences through a combination of landlord references and the home visit, this criterion will be considered satisfied. Ability to comply with CHA lease terms will be checked only in the absence of satisfactory landlord documentation.

2. If any current conditions of occupancy can be considered in light of CHA's lease requirements, staff will send the appropriate verification forms. Staff will also complete Parts I and II of CHA's Applicant Screening Interview Checklist in an interview with the applicant.

3. If the provider is unable (the provider may have no knowledge that the unit is housing two families) or unwilling to complete the verification process, CHA will send appropriate forms to other third parties or persons with knowledge of the applicant's current living arrangements or to the host family. If the host family completes the form, CHA will judge the completed form in light of any family ties between the host family and the applicant family.

4. These forms may bring to light mitigating circumstances or reasonable accommodations an applicant may need (to care for the unit or manage money, for example) and enable CHA to determine that the applicant has such services (provided by a third party) in place before the applicant is admitted.

5. Ability and willingness to comply with the lease terms may be demonstrated by the following actions:

    a. The applicant can meet this criterion on his/her own or with assistance that the applicant obtains;

    b. Based on a home visit, the unit or living area is clean with no evidence of applicant caused health or safety problems;

    c. No record or home visit yields evidence of destruction of property;

    d. Ability to manage regular monthly payments of some kind;

    e. Responds to mail and shows up for appointments; follows any applicable rules in his/her current housing or shelter situation; and

    f. No record of disturbing neighbors; avoids criminal activity.

6. In addition, compliance with lease terms can be demonstrated by the following:

    a. Evidence of rule compliance in any residential program (shelters, transitional facilities, group homes) or other program in which the applicant is participating;

    b. Job or school references; and

    c. Completing a pre-occupancy briefing acceptable to CHA.

## VII. HOME VISITS

**A.** CHA will make a home visit on all applicants who have successfully completed all previous stages of this screening process:

**B.** Home Visits

1. Home visits will be conducted by CHA staff and residents. They may be conducted by an individual or in teams. CHA will give additional weight to the results of the home visit when the following conditions exist:

    a. One bad housekeeping reference from prior landlords or housing providers, including residential programs and shelters;

    b. Verification forms show a marked difference or discrepancies in the

housekeeping assessment of the applicant;

c. The applicant is unable to provide any documentation to support a positive assessment of living or housekeeping habits as required by this screening criterion.

2. The home visit will be conducted using CHA's Home Visit Form. Applicants will be notified at least two days in advance of the scheduled home visit.

3. Where the applicant is living in a shelter, or other transitory housing facilities, CHA has the option to visit the site or to confirm compliance with facility regulations using the Applicant Screening Interview Checklist and third party verification forms.

4. Applicants who are sharing housing either with family members or friends must be advised that CHA will inspect the common areas such as the living room kitchen and bathroom of the unit, not just the applicant's room(s). A family that is willing to live in unsanitary or infested conditions created by others may have standards that are too low for admission. Any area for which the applicant has upkeep responsibility will be noted.

5. It is not necessary to do a home visit to a medical institution, although CHA staff/residents may need to make a determination whether the applicant would need services which, if provided by CHA staff, would constitute a fundamental alteration in the nature of CHA's program.

6. All CHA staff and residents who perform home visits are trained to ensure that the home visit form is completed fully and correctly. The purpose of the home visit is not to perform a "White Glove" check of the applicant's housekeeping, but rather to determine: whether the applicant is capable of caring for a CHA unit in a way that will not create health or safety hazards or contribute to infestation; whether the applicant is likely to damage a CHA unit; and whether the applicant is currently engaged in behavior or practices that would violate CHA's lease.

7. If the unit inspected as part of the home visit shows applicant-caused health or safety hazards, housekeeping that contributes to infestation or applicant-caused damage; the application will usually be rejected.

8. Likewise, if the home visit revealed that the applicant was currently permitting unauthorized occupants to share the unit, was engaged in criminal activity or displayed some other situation that was inconsistent with the information presented on the application, the applicant could be rejected. CHA will document any cases where the home visit results in a rejection.

9. CHA staff and residents performing the home visit will be trained to note the

difference between damage to the current residence that has been caused by the applicant as opposed to substandard conditions in the unit that are the responsibility of the landlord or housing provider.

10. An applicant's behavior toward CHA staff and residents conducting the home visit will be considered in relation to future behavior toward neighbors. Physical or verbal abuse or threats by an applicant toward CHA staff or residents will be noted in the file and included in the screening evaluation.

11. Applicants that fail the home visit are rejected. If the applicant attends the pre-occupancy briefing the reinspection will occur after attendance at the training. (Note: The pre-occupancy briefing would normally occur after the rest of the screening process is completed. Referrals as described in this paragraph may require a different processing sequence.)

## VIII. PRE-OCCUPANCY BRIEFING

**A.** Completion of a pre-occupancy briefing designed by CHA in cooperation with existing residents; or delivered by a third party under contract to CHA will be required by <u>all</u> applicants.

1. Attendance, behavior during the briefing, and satisfactory completion of the briefing, are part of CHA's screening criteria. Failure to attend and satisfactorily complete the program will result in rejection of the application.

2. The briefing will typically be offered when the applicant is within 90 day's of being offered a unit. (Applicants that fail a home visit may be referred to this program on a different schedule than that noted here.) A pool of applicants that have successfully completed the briefing will be maintained by CHA. A unit will not be offered until an applicant's successfully completes the program.

3. The briefing, once implemented, may include the following topics:

   a. Program purpose and relationship to CHA's screening
   b. How screening relates to lease compliance
   c. Keeping the unit clean
   c. Review of CHA's lease requirements, house rules, safety and security issues
   d. Information on the CHA Family Self-Sufficiency Program
   e. Rights and responsibilities of CHA and the resident
   f. Procedures that will be followed should lease violations occur CHA's obligation to make reasonable accommodations for person with disabilities
   g. Role of the resident council

**B.** CHA's pre-occupancy briefing is fully accessible to persons with disabilities.

## IX. RECOMMENDATION OF ADMISSION OR REJECTION -- APPLICANT SCREENING

**A.** When a determination of eligibility and qualification for Preferences has been made and either the verification forms have been returned or telephone verifications obtained, and the Home Visit and the pre-occupancy briefing completed, staff will make a recommendation of Admission or Rejection. This determination will be based on the following:

1. Responses from current and at least one former landlord or response from housing providers other than a private landlord (if applicable) - All positive or neutral responses would mean the applicant family can be recommended for admission. The applicant must be considered capable of and willing to comply with CHA's lease terms for a recommendation of admission;

2. Responses from utility suppliers (if applicable) - A positive or neutral response that is consistent with the landlord information would result in a recommendation for admission;

3. Subject to CHA's consideration of any mitigating circumstances, no member of the applicant family 17 years of age or older should be currently involved in criminal activity, have Charges pending, or be convicted of a felony' for a recommendation of admission;

4. Credit reports or eviction service information (if applicable) - The applicant must have a neutral or good record for a recommendation of admission. This would include no evictions due to lease violations or non-payment of rent within the past three (3) years or past three (3) tenancies whichever is longer.

5. Home Visit Report (when performed per these procedures) - To be recommended for admission the applicant must receive a satisfactory or better rating.

6. Pre-occupancy briefing CHA requires that applicants with poor housekeeping or a lack of verifications in any two of the screening criteria attend a resident orientation program. The applicant must receive a satisfactory or better rating for completing the program.

7. Admissions Folder Checklist-Staff will complete a File Completion Checklist for each application file. If, at any point in the screening process, it becomes clear to staff that an applicant will not meet the screening criteria, the Checklist will be signed and the decision to reject noted. The same procedure will be followed when applicants are certified acceptable for admission.

**B.** Supervisory review of folders - Difficult cases may also be forwarded to the appropriate supervisor for discussion and review. The first step in the supervisory review of a difficult case is a determination of the file's completeness. If any information is missing or the case for rejection or acceptance is not compelling, the file will be returned to the staff for further work.

**C.** **Quality Control (QC):** From time to time selected folders will be sent to the appropriate supervisor for a quality control review. The supervisor will review the folder and initial the checklist. On a monthly basis, supervisors will perform quality control reviews by reviewing folders at random. Information in the folder will be cross-checked against the information in the computer. Results of the QC review will be shared with staff. Further, the results of the QC will be considered in evaluating staff performance.

**D.** **The following list of factors that will not be considered in making a decision to reject an application:**

- Race
- Age
- Marital Status
- Political Ideology
- National Origin
- Color
- Source of Income
- Parental Status
- Handicap or Disability
- including mental or physical
- Religion
- Sex
- Sexual Preference
- Ancestry

**E.** **During the screening process, staff performing the review will consider the following prior to rejection of any applicant:**

1. In accordance with 24 CFR 960.205(d), CHA is required to consider mitigating circumstances for all applicants and will so note in correspondence to the applicant. If negative screening information is received on an applicant, staff will contact the applicant and set up a second meeting to determine whether mitigating circumstances exist that make it possible to approve the application.

2. Persons with a known disability - If negative screening information is received on such an applicant, staff will contact the applicant and set up a second meeting to determine whether mitigating circumstances or reasonable accommodation would make it possible to approve the application.

**F.** If the applicant is not known to have a disability or handicap, or there is no evidence of mitigating circumstances, the application will be rejected. If an applicant is clearly eligible and passes the screening criteria, admission shall be authorized. Similarly, if the applicant is ineligible, rejection shall be authorized.

**G.** If rejected, an applicant may request an informal meeting to determine whether the rejection was in compliance with the aforesaid procedures.

## X. ACCEPTABLE DOCUMENTATION RECEIVED DURING THE SCREENING PROCESS

**A.** In addition to, in support of, or in lieu of a landlord verification form, CHA will accept credible evidence of rent payment or utility payments in the form of canceled rent checks or money orders for any period of tenancy under review. CHA will review 1 to 12 months of rent receipts, utility bills, etc. unless the applicant documents that a shorter period time is applicable.

**B.** Acceptable documentation for an applicant's history, with respect to disturbances, destruction of property, damages, housekeeping habits, and care of the unit are:

1. Completed Landlord Verification Form for all previous tenancies as required by these procedures. The form includes questions related to this screening criterion, specifically questions on caring for the unit, and questions on applicant behavior while a resident.

2. If no landlord verification is possible. A completed Part 1 of the Applicant Screening Interview Checklist and completed verification forms with any discrepancies in the information on these forms resolved to CHA's satisfaction. Forms will include questions for both the applicant and third parties applicable to the ability to care for the unit, general lease compliance, and ability to perform activities that relate to lease compliance.

3. A completed CHA Home Visit Form.

4. No criminal offenses or criminal activity as reported through State and local criminal records systems.

**C.** When evaluating documentation received with respect to disturbances, destruction of property, damages, housekeeping habits, and care of the unit; CHA will give the greatest weight for admission to applicants with:

1. No record of activity or behavior that would disturb other residents or neighbors peaceful enjoyment of their accommodations, no record of activity or behavior that resulted in damage to an apartment unit or residential facility of any kind, grounds or common areas associated with such apartment or facility, the real or personal property of neighbors.

2. No record of activity or behavior (especially housekeeping) that resulted in safety violations, unsanitary or unhealthy conditions in a unit. Evidence that the

applicant reported maintenance problems to the landlord in a timely manner.

3. Where objectionable behavior has occurred, clear evidence of mitigating circumstances and evidence that the applicant ceased the behavior or activity and, where applicable, made restitution (monetary or otherwise) to persons affected.

4. Where damage to property occurred clear evidence of mitigating circumstances such that the applicant ceased the behavior or activity and, where applicable, made restitution (monetary or otherwise) that resulted in the property being restored to a decent, safe, and sanitary condition. (E.g. paid reasonable Charges for the cost of repairs.)

**D.** Other indicators for applicant's history with respect to disturbances, destruction of property damages, housekeeping habits and care of the unit are:

1. Caring for one's room or space (especially when living with someone else or in a shelter or group home);

2. Maintaining any physical space (perhaps related to a job);

3. Availability and use of a chore service or other assistance with care of the unit;

4. Live-in aide available;

5. When offered by CHA, successfully answering questions about how to care for an apartment and successful completion of a residency-training program acceptable to CHA.

6. Treatment of others with whom s/he lives;

7. Treatment of administrators or other participants in programs that the applicant is or has participated in;

8. Recent school and work relationships; and

9. When offered by CHA, behavior during completion of residency training program acceptable to CHA.

## XI. SCREENING CRITERIA AND RELEVANT PROCEDURES FOR APPLICANTS WITH DISABILITIES

### A. Meeting Section 504 Access and Communications Requirements During the Application Process

1. If an applicant has difficulty completing written forms, CHA will permit the applicant to bring someone to the interview to assist them or permit forms to be completed at home. (Third party verifications will not be given to applicants. CHA will contact the third party directly.)

2. To insure the opportunity for equal access to housing benefits and program related services; CHA will make reasonable accommodations for applicants with disabilities. CHA will also make sure that forms and other documents completed by applicants are available in accessible formats. If requested by the applicant with disabilities, CHA will provide sign language interpreters and other auxiliary aides.

3. CHA will confirm the presence of a disability, but will not make inquiries about its nature or extent prior to making any accommodation or providing auxiliary aides.

4. At the time of initial application, CHA will provide a notice to all applicants that explains Section 504 and Fair Housing requirements including the right to request reasonable accommodations.

5. Intake and screening interviews and other meetings required during the application process will be conducted at accessible locations. CHA will make arrangements with the applicant to meet at home or at a location that is accessible.

6. CHA will not make accommodations that cause a fundamental alteration in the nature of the program or create undue financial and administrative burdens.

B. Considering Mitigating Circumstances for all Applicants and Reasonable Accommodations for Applicants with Disabilities

1. It is illegal to reject an applicant because he or she is a person with a disability, or for reasons that could be overcome by CHA's reasonable accommodation of the applicant's disability or handicap. If, even with reasonable accommodation, applicants with disabilities or handicaps cannot meet essential program requirements, it is permissible to reject them.

2. Such inability to meet program requirements might arise because of behavior or performance in past housing, inability to comply with the terms of CHA's lease, or needed services from CHA's staff that represent an alteration in the fundamental nature of CHA's program. (E.g. Services to residents that are beyond the scope of the housing program, services not a part of the program.)

**C. Meeting Part 913 and the Section 504 Regulations requirements for processing applicants including persons with disabilities.**

1. Stage 1: Eligibility Review (Applies to all applicants)

    a. The first stage of processing is the determination of program eligibility. At this point verification of disability or handicapped is needed only to determine eligibility for a unit with accessible features or units in properties designated for use by special populations. In addition a verification of disability will also be needed where an applicant claims deductions for income specific to their status as an elderly/disabled household.

    b. For admission to certain properties "disabled family" status is required to meet the eligibility criterion related to that property (besides qualifying the member for a special deduction in rent computation and conferring a preference in assigning units in designated buildings). Once an applicant has been determined to have a disability or handicap, no further reference should be made to that fact unless the application reaches the third stage of processing.

2. Stage 2: Applying the Applicant Selection Criteria (Applies to all applicants)

    a. The second stage of processing is applying the applicant selection criteria contained in this procedure. Thus, an applicant who happens to have a disability or handicap but is able to demonstrate a history of meeting financial obligations, caring for a rental unit, avoiding disturbing neighbors and destroying property, eschewing criminal behavior, and. if necessary; ability to comply with CHA's lease, would be recommended for admission with no further reference to or consideration of any disability or handicap. Neither mitigating circumstances nor reasonable accommodations will be an issue for any applicant who passes the applicant selection criteria.

3. Stage 3: Seeking Mitigating Circumstances (Applies to all applicants) or Reasonable Accommodation (For applicants with disabilities only)

    a. The third stage of processing would only come into play if an applicant could not meet one or more of the applicant selection criteria discussed in these procedures. At this point, applicants with disabilities or handicaps are entitled to considerations of reasonable accommodations.

    b. Prior to issuance of a Notice of Rejection, staff will hold a follow-up meeting, with any applicant <u>known</u> to have a disability or handicap who cannot meet one or more of the applicant screening criteria. The purpose of the follow-up meeting is to determine whether it is possible to admit the applicant through consideration of mitigating circumstances (available to all CIIA applicants) or by applying reasonable accommodation (available only to applicants with disabilities).

c. Mitigating circumstances[5] are facts relating to the applicant's record of unsuitable rental history or behavior, which, when verified, would indicate both:

i. The reason for the unsuitable rental history and/or behavior; and

ii. That the reason for the unsuitable rental history and behavior is no longer in effect or is under control and applicant's prospect for lease compliance is an acceptable one, justifying admission. Mitigating circumstances would overcome or outweigh information already gathered in the resident screening process.

For example, if an applicant's previous history of disturbing neighbors was very poor, but his recent behavior was much improved, CHA could consider this a mitigating circumstance. Applicants have a responsibility to provide credible evidence to document the improvement if the file contains only data about the former problems. CHA, with the applicant's cooperation, will seek third party verification of applicant claims of improved behavior.

4. If the evidence of mitigating circumstances presented by the applicant relates to a change in medical condition or course of treatment, CHA shall have the right to refer such information, subject to the applicant's authorization, to persons qualified to evaluate the evidence and verify the mitigating circumstance.

5. CHA shall also have the right to request further information reasonably needed to verify the mitigating circumstance, even if such information is of a medically confidential nature. Such inquiries will be limited to the information necessary to verify the mitigating circumstances or reasonable accommodation. (See below.) If the applicant refuses to provide further information, CHA will give no further consideration to the mitigating circumstance.

6. Screening personnel must keep in mind that an applicant with a handicap or disability who may, for example, be unable to care for a current apartment alone, may still qualify as able to comply with the lease if he or she can demonstrate that assistance with caring for the unit has been secured. Such assistance could be in the form of a Live-in Aide, or it could be a friend, family member, chore service or employee of the applicant. It is not the province of CHA to make judgments about the best way to provide assistance, but simply to determine whether the assistance will enable the applicant to meet the

[5] The discussion of mitigating circumstance in this paragraph is applicable to all applicants. The CHA is required to consider mitigating circumstance, see 24 CFR § 96O2O3 (d) (1).

screening criteria.

7. If some form of assistance is needed to enable an applicant to comply fully with the lease terms, screening staff should obtain verifications that such assistance is available to the applicant. The Certification of an Individual or Agency Providing Assistance Form should be used for this verification.

**D. Reasonable Accommodations for applicants with disabilities (Disability status subject to verification by CHA.)**

1. If no mitigating circumstances exist that satisfy CHA's applicant selection criteria, CHA must consider reasonable accommodations requested by the applicant or structural modifications that CHA could make to eliminate administrative or architectural barriers to housing the applicant.

2. Reasonable accommodations may take the form of Changes in rules, policies, practices, or services (if provided by' CHA). When such accommodations are necessary to afford a person with disabilities equal opportunity to participate in the program or to use and enjoy a CHA dwelling unit, including public and common use areas. An example of a reasonable accommodation at the time of admission might be approving an applicant for a larger unit (waiving the unit occupancy standards) to permit occupancy by a live-in aide who would assist the applicant with some aspect of lease compliance the applicant could not otherwise achieve.

3. Structural Changes include physical Changes made to the unit, building, development or grounds.

4. Accommodations or structural modifications, to be considered reasonable, must not cause undue financial or administrative burdens or an alteration in the fundamental nature of CHA's public housing program. If a service is necessary for compliance with the lease, CHA cannot be required to provide it to an applicant with a disability if it is not provided to other residents; but the CHA must consider admitting that applicant if he or she can document that the service will be provided by others at no cost to CHA.

**E. Screening and substance abusers (see section IV of these procedures).**

**F. Rejecting Applicants with Disabilities** - Any applicant with a disability or handicap who cannot meet the applicant screening criteria taking into account possible mitigating circumstances, reasonable accommodations by CHA or services needed for lease compliance verified to be provided to the applicant by others, must be rejected.

**CHICAGO HOUSING AUTHORITY**
**INCOME DISREGARD PROCEDURES**

The procedures described below implement the income disregard provisions of the Admissions and Occupancy Policy.

## I. BACKGROUND

The Chicago Housing Authority's Income Disregard Procedures outline how the CHA will comply with all applicable Federal, state and local income disregard requirements (See 42 USC 1437(a), 24 C.F.R. 5.609 (c) (8)(v) and 310 ILCS 10/8.22(ii). The policy helps residents on the road to economic self-sufficiency by minimizing rent increases to the maximum extent allowed by law.

## I. INCOME DISREGARD PROCEDURES

### A. Registration Required To Obtain Disregard

Residents must contact their Property Manager and provide information needed in order to process the income disregard in a timely manner.

1. **Reporting to Property Manager** - Residents must notify their Property Manager once they become employed or begin a job-training program in order to activate the income disregard.

2. **Third Party Verification**- Resident must provide their Property Manager with all information required to verify employment and training participation. (E.g. dates of unemployment, contact information of employer, contact information of job training program, etc.) The Property Manager is then responsible for processing all third-party verifications to ensure compliance with the income disregard policy.

3. **Period of Income Disregard** - Once all applicable third-party verifications have been confirmed, the Property Manager will process the income disregard for the applicable time periods:

   - Training income disregard: Lasts for the duration of the training program.
   - Employment income disregard (Federal Law): Lasts for the first 12 consecutive months of employment.
   - Employment income disregard (State Law): Lasts for the first 18 consecutive months of employment.
   - Additional provisions: Residents pay only 50% of increase in rent for the next 12 consecutive months following an employment income disregard.

4. **Retroactive Income Disregard** - Residents must notify their Property Manager and provide information needed in order to process the

retroactive income disregard. The Property Manager will confirm all applicable third-party verifications.

## B. CHANGES IN INCOME DURING INCOME DISREGARD

1. **Additional Income** - During the disregard period, the additional earned income received by the household member will be excluded from the total tenant payment calculation. If family members not receiving a disregard experience an increase in income, or new members earning income are added to the household, the household's rent will increase.

   During the disregard period, any changes in income for <u>any</u> household member age 18 years or older (including those members eligible for an exclusion) must be reported to the Property Manager in accordance with the CHA Residential Lease Agreement.

2. **Change in Employment Status** - Residents must notify their Property Manager, if employment is terminated. If the resident voluntarily ceases employment without good cause, the exclusion period shall end. If employment status changes with good cause, continuation of the income disregard will be assessed on a case-by-case basis.

## C. CALCULATIONS OF RETROACTIVE INCOME DISREGARD

1. To initiate the retroactive income disregard, the Property Manager will recalculate the rent, using the disregard income levels that correspond to the verified disregard period. The rent will then be compared to the rent actually charged for the same period. Adjustments will be made for interim or annual recertifications performed during the retroactive period. To determine the dollar amount of rent that the household overpaid, the Property Manager will multiply the monthly dollar amount overpaid during the original disregard period by the total number of months of the income disregard period. The amount overpaid will be issued to the resident in the form of a rent credit.

2. **Effective Dates** - The beginning dates for determination of the amount of retroactive income disregard are the dates that the regulations and/or statutes governing a particular job-training program went into effect. The retroactive disregard dates are as follows:

   a. <u>Effective September 23, 1994</u>, CHA will disregard additional income earned by a resident as a result of participation in an approved job training program for the duration of the program and the first 18 consecutive months of the first job procured after completion of the training program. See 42 U.S.C. 1437.

b. Effective June 5, 1995, CHA will disregard incremental earnings and benefits resulting to any family member from participation in qualifying State or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under an employment-training program with clearly defined goals and objectives. Substantive income is excluded only for the period during which the family member participates in the employment-training program.

c. Effective January 1, 1994, State law provides for the exclusion of any income earned by a tenant during the first, 18 consecutive months of employment, which follows a period of unemployment of 6 or more consecutive months.

## D. ANNUAL RECERTIFICATIONS

When a household's annual re-certification date occurs during the income disregard period, the Property Manager will complete the recertification and calculate rent twice, first based on actual earned income reported by the household and second using the "adjusted" income level of the member eligible for a disregard. During the disregard period, the adjusted income will be used to calculate rent. The Property Manager must keep on file the actual income earned by the eligible member. This income will be included in the rent calculation on the first month after the conclusion of the training program income disregard period and/or the first job income disregard period.

**CHICAGO HOUSING AUTHORITY**
**RESIDENT'S GRIEVANCE PROCEDURES**

This grievance procedure is issued in accordance with 24 CFR 966.50 of HUD regulations.

## APPLICABILITY

The procedures concerning the obligations of tenants and CHA with respect to tenancy outlined herein are applicable to all CHA tenants except as hereinafter stated, including the Section 8 Program. These procedures shall not be applicable to disputes between tenants not involving CHA or to class grievances such as rent action. Nor are these procedures intended to provide a forum for initiating or negotiating policy changes between a group or groups of tenants and CHA.

## GRIEVANCE - DEFINITION

Grievance shall mean any dispute which a tenant may have with respect to CHA action or failure to act in accordance with the individual tenant's lease or CHA regulations which adversely affects the tenant's rights, duties, welfare or status. Grievance shall include, but are not limited to, examination of income to determine rent and eligibility, inspection of the dwelling unit to determine its condition, the imposition of the lease provisions to protect the CHA's property, the procedures and grounds used to collect rent or evict families, the procedures and grounds used to transfer families within or between housing developments, the assessment of charges for damages, as well as the termination of tenancy because of non-compliance with the terms of the lease and termination of tenancy based upon the tenant's creation or maintenance of a non-criminal threat to the health and safety of other tenants or CHA employees.

## NOTICE OF ADVERSE ACTION

The CHA will notify the tenant in writing of the specific grounds for any proposed adverse action. In cases where the CHA is required to afford the tenant the opportunity for a hearing, the notice of proposed adverse will inform the tenant of the right to request such hearing.

## NEW TENANTS

A the time of leasing, the housing manager will furnish each new tenant with a copy of the CHA grievance procedure together with exhibits attached thereto, including Notice of Rights or between developments shall not be considered a new tenant.

## INFORMAL HEARING

1. Tenants shall file their grievance either orally or in writing with the Management Offices within the following times:
   a. Grieving an eviction:

      i. within ten (10) days of the receipt of the termination notice by the tenant in non-criminal evictions when the health or safety of other tenants or CHA employees is threatened;

      ii. within fourteen (14) days of the receipt of the termination notice by the tenant in the case of rent disputes;

      iii. within thirty (30) days of the receipt of the termination notice by the tenant for all other eviction cases.

   b. Non-Eviction Grievances: within a reasonable time, but in no event later than thirty (30) days, from the date the tenant put the Management Office on notice, orally or in writing, of any claim or problem created by the CHA's action or failure to act, provide further that the tenant must put the CHA on notice of the claim or problem within thirty (30) days of the time the tenant first knew or should have know if existed. CHA Form 630, Rev. 6/96.

   On the bottom of every Notice of Termination Tenancy, the tenant shall be notified that they have a right to request a grievance hearing either orally or in writing within the applicable number of days from receipt of the Notice. The notice termination shall include the Notice to Vacate. The CHA shall also provide reasonable accommodations for tenants with disabilities to participate in the hearings.

2. Tenant shall be given a receipt indicating that a request was made and the date of the request. CHA Form 831, Rev. 6/96. A copy of the receipt shall be placed in the resident file.

3. The Development Manager will hold an informal hearing within five (5) days of receiving a resident's request for the hearing.

4. Within three (3) days of the informal hearing, management will send a copy of the disposition of the informal hearing to the tenant. A copy of the disposition of the informal hearing shall also be sent to the Legal Department, and a copy will be placed in the tenant's file.

5. The Formal Hearing Request Form will be mailed or delivered to the tenant along with a copy of the disposition of the informal hearing, CHA Form, 631, Rev. 6/96.

6. In the case of a proposed adverse action other than a proposed lease termination, the CHA shall not take the proposed action until the time for the tenant to request a grievance hearing has expired, and (if a hearing was timely requested by the tenant) the grievance process has been completed. When CHA is required to afford the

tenant the opportunity for a hearing under CHA grievance procedure for a grievance concerning the lease termination, the tenancy shall not terminate (even if any notice to vacate under state or local law has expired) until the time for the tenant to request a grievance hearing has expired, and (if a hearing was timely requested by the tenant) the grievance process has been completed.

## FORMAL HEARING

1. If not satisfied with the results of the informal hearing, the tenant shall request a formal hearing within seven (7) days of receiving a copy of the disposition of the informal hearing.

2. The resident shall use the Form Hearing Request Form, supplied by CHA, to request the formal hearing. The form shall be mailed or delivered to the CHA Hearing Officer.

3. A copy of the request for the form hearing shall be sent by the Hearing Officer to the Legal Department, and the Resident's Management Office. A formal hearing shall be held within 15 days of the receipt of the formal hearing request form by the Hearing Officer. If the tenant fails to request a hearing, the proposed disposition of the housing manager becomes final. However, failure by the tenant to request a hearing shall not constitute a waiver of the tenant's right to contest CHA's action in disposing of the grievance in court.

4. The CHA will provide reasonable accommodation for persons with disabilities to participate in the hearing.

   Reasonable accommodation may include qualified sign language interpreters, readers, accessible locations, or attendants.

   If the tenant is visually impaired, any notice to the tenant which is required under this subpart will be in accessible format.

## SELECTION OF HEARING OFFICERS

The CHA will consult with the CAC and LAC, resident management corporations and other resident organizations certified by the LAC before hearing officers are appointed. Hearing Officers shall be selected, appointed, and sworn by the Chief Operating Officer after review and recommendation from the General Counsel. Hearing Officer candidates may be selected from within or outside the CHA. The Chief Operating Officer shall determine that the Hearing Officer appointees are qualified by education, experience, and training to perform the duties of Hearing Officers. The Hearing Officer appointees shall be fair, unbiased, and follow the law, regulations and circulars of the CHA. The Hearing Officer shall be a person other than a person who made or approved the CHA action under review or a subordinate of such person.

## HEARING OFFICER AND
## TENANTS' GRIEVANCE PANEL

The CHA may elect to provide a hearing before an Officer or grievance panel at the CHA's sole discretion and option.

If CHA should decide to have a grievance panel, the tenant members of the Grievance Panel shall be selected from a pool of volunteers solicited from the general tenant population and approved by the Central Advisory Council or Local Advisory Council. Any tenant may serve provided that the tenant has no outstanding accounts, pending grievances or court actions and is capable of making a fair decision based solely and exclusively on the facts presented at the hearing. Panel members will be notified in writing of the time and location of the hearing.

## WITNESSES

All witnesses shall be sworn in by the Hearing Officer. The Hearing Officer, a panel member, and the tenant or tenant's representative may question any witness.

## RECORDINGS OF HEARING

A mechanical or stenographic recording shall be made of the grievance hearings. The Hearing Officer shall be responsible for securing a tape recorder or stenographer prior to the hearing.

## PROCEDURES GOVERNING HEARINGS

The following rules shall be observed in conducting a hearing.

1. The tenant shall be afforded a fair hearing which shall included:
   a) Written notification of the time and location of the hearing;

   b) The opportunity to examine the (tenant's) file and take notes before the hearing, and at the expense of the tenant, to copy all documents, records and regulations of CHA that are relevant to the hearing. Requests for copies of documents, records and CHA regulations shall be submitted in writing by the tenant or by tenant's counsel to the Hearing Officer. Any document requested by or on behalf of the tenant in the possession of the CHA, which is not made available after request by the tenant, may not be relied on by CHA at a grievance hearing;

c) The right to be represented by counsel or other persons chosen as the tenant's representative and to have such person make statements on the tenant's behalf;

d) The right to a private hearing unless the tenant requests a public hearing;

e) The right to present evidence and argument in support of the tenant's complaint, to controvert evidence relied on by the CHA or project management, and to confront and cross-examine all witnesses upon whose testimony or information the CHA or project management relies; and

f) A decision based solely and exclusively upon the facts presented at the hearing.

2. The Hearing Officer may render a decision without proceeding with the hearing if they Hearing Officer determines that the issue has been previously decided in another proceeding.

3. If the tenant fails to appear at the scheduled hearing without notice to CHA, the Hearing Officer may make a determination to postpone the hearing not to exceed five (5) business days or make a determination that the tenant has waived tenant's right to a grievance hearing.

   A tenant may only request a vacate a waiver of a grievance hearing one (1) time.

4. The hearing shall be conducted informally by the Hearing Officer and oral or documentary evidence pertinent to the facts and issues raised by the tenant may be received without regard to admissibility under rules of evidence applicable to judicial proceedings.

5. The Hearing Officer shall require CHA, the tenant, counsel and other participants to conduct themselves in an orderly fashion. Failure to comply with the directions of the Hearing Officer to obtain order may result in exclusion from the proceedings or in a decision adverse tot he interest of the disorderly party and granting or denial of the relief sought as appropriate.

6. The tenant may arrange, in advance of, or following the hearing, and at the expense of the tenant, a copy of the record of the hearing.

## GREIVANCE HEARING DECISION

The Hearing Officer shall prepare a written summary of the hearing on the Record of Tenant's Grievance Proceedings, CHA Form 636, Rev. 6/96. This form shall be maintained on file, to be available to the tenant grievant, his or her representative, or the hearing panel (in case where a panel was used). The notification of disposition shall be sent to the tenant grievant within five (5) days of the hearing. The decision of the Hearing Officer and or panel shall be final.

_____
Account No.

**NOTICE OF RIGHT TO FORMAL TENANT'S GRIEVANCE**

I have been advised of my right to an Informal Hearing with the Housing Manager in case of a grievance with respect to CHA action or failure to act in accordance with the lease or CHA regulations, which may adversely affect my rights, duties, welfare, or status.

I have also been advised that if I am not satisfied with the proposed informal disposition of my grievance, I have a right to a Formal hearing with a Hearing Officer or, if applicable, a Hearing Panel, under the "Hearing Officer and Tenant's Grievance Panel" Section of Administrative Circular 865.

I will have the right to appear at the Form Hearing and speak in my own behalf, to bring witnesses and documents as I desire, to cross-examine CHA witnesses and be represented by counsel or other representatives of my choice. I have the right before hearing to examine and copy any CHA documents, records, and/or regulations that are directly relevant to the hearing.

_____
(Print Name)

_____
(Tenant's Signature)

_____
(Date)

CHA Form 636
Rev. 6/96

## GRIEVANCE PRESENTED

DATE OF REQUEST: _____

TENANT'S NAME: _____

ADDRESS: _____

TELEPHONE NO: _____ ACCOUNT NO: _____

NATURE OF GRIEVANCE: _____

_____

_____

_____

REQUESTED RELIEF: _____

_____ _____
TENANT'S SIGNATURE DATE

_____
CHA MANAGEMENT

---

## INFORMAL HEARING

HEARING DATE: _____ TIME: _____

LOCATION: _____

COMMENTS: _____

_____

PARTIES PRESENT: _____

DISPOSITION: _____

_____

REASON FOR DISPOSITION: _____

_____

_____ _____
DATE MANAGER'S SIGNATURE

TO THE TENANT: IF YOU DO NOT AGREE WITH THE DISPOSITION OF YOUR COMPLAINT WHICH RESULTS FROM THE INFORMAL HEARING. YOU HAVE THE RIGHT TO DISCUSS YOUR GRIEVANCE WITH A HEARING OFFICER OR IF APPLICABLE, A HEARING PANEL UNDER THE "HEARING OFFIER AND TENANT'S GRIEVANCE PANEL" SECTION OF CHA GRIEVANCE PROCEDURES. IF YOU DESIRE THIS HEARING, YOU MUST SIGN AND SUBMIT A FORMAL HEARING REQUEST FORM WITHIN 7 DAYS OF TODAY. IF YOU DO NOT SUBMIT THE

FORM WITHIN 7 DAYS. YOU WILL WAIVE YOUR RIGHT TO A HEARING AND THE DISPOSITION AND COMPLAINT PROPOSED BY THE MANAGER WILL BECOME FINAL.

C: HEARING OFFICER

CHA FORM 831
REV. 6/96

# TENANT RECEIPT FOR

# INFORMAL HEARING REQUEST

A request for an Informal hearing with _____
(Development Name)

Management was made on _____ by _____.
(Date) (Print Tenant's Name)

I _____ acknowledge receipt of the tenant's request for an
(Development Manager)

Informal Hearing.

_____ _____
Signature of Manager Date

_____ _____
Signature of Tenant Date

CHA Form 631
Rev. 6/96

**FORMAL HEARING REQUEST FORM**

ACCOUNT #: _____

HEARING OFFICER
CHICAGO HOUSING AUTHORITY
OFFICE OF THE GENERAL COUNSEL
200 WEST ADAMS, SUITE 2100
CHICAGO, ILLINOIS 60602

HEARING OFFICER:

I hereby request a Formal Hearing to present the following grievance: _____

_____

_____

_____

_____

Requested Relief: _____

NAME: _____

ADDRESS: _____ APT. NO.: _____

MY TELEPHONE NUMBER DURING THE DAY: _____

TENANT'S REPRESENTATIVE (IF ANY): _____

REPRESENTATIVE'S ADDRESS: _____

REPRESENTATIVE'S TELEPHONE NUMBER: _____

NAME OF DEVELOPMENT IN WHICH I LIVE: _____

_____ _____
Signature Date

CHA Form 636
Rev. 6/96

**RECORD OF TENANT'S GRIEVANCE HEARING PROCEEDINGS**

TENANT: _____ PHONE: _____

ADDRESS: _____ APT. #: _____

DEVELOPMENT: _____ ACCOUNT #: _____

HEARING LOCATION: _____

ADDRESS: _____

DATE OF HEARING: _____ TIME: _____

REASON FOR HEARING: _____

---

RESIDENT PRESENT: YES _____ NO_____

RESIDENT REPRESENTED BY COUNSEL: YES_____ NO_____

NAME: _____ ORG.: _____

ADDRESS: _____ TELEPHONE: _____

CHA WITNESSES:

_____

_____

TENANT'S WITNESSES:

_____

_____

DOCUMENTARY EVIDENCE:

_____

_____

FINDINGS:

_____

_____

DISPOSITION:

_____

_____

GRIEVANCE PANEL MEMBERS (IF APPLICABLE):

_____

_____

HEARING OFFICER

**CHICAGO HOUSING AUTHORITY**
**CEILING RENT PROCEDURES**

## I. BACKGROUND

Federal Register Notice 2597 entitled *Policy on Establishment of Ceiling Rents for Public Housing,* dated March 15, 1989, and subsequent HUD notices outline the requirements of ceiling rent procedures. In 1990, the Authority implemented a HUD approved ceiling rent schedule, which was revised on January 23, 1998, to reflect current market rents and resident incomes. Federal Regulations State that the ceiling rent schedule must be equal to or greater than the total average monthly amount (TAMA), which is calculated using a HUD provided formula.

## II. PROCEDURES

The CHA adopts a two-tiered ceiling rent schedule. For units currently existing in the housing stock, the ceiling rents are based on the CHA's total average monthly amount (TAMA). For new or replacement housing and rehabbed units, the ceiling rents are based on 80% of the Fair Market Rents (FMR). The CHA will review the ceiling rent schedule annually to ensure its appropriateness.

### A. Eligibility

Upon annual recertification, if 30% of a family's adjusted monthly income (total tenant payment) is more than or equal to the ceiling rent for their unit size, they will be charged the appropriate ceiling rent. If at any time the family's total tenant payment falls below the ceiling rent, their rent will be adjusted according to their new income. Rent is based on the lesser amount: 30% of monthly-adjusted income or the appropriate ceiling rent.

### B. Ceiling Rent Schedule

1. **Schedule I**: For the existing housing stock ceiling rents are based on the total average monthly amount (TAMA).
2. **Schedule II**: For new or replacement housing and rehabbed units with Annual Contributions Contracts (ACC) executed after January 1, 1996, ceiling rents are based on 80% of the FMR.

| | 0 bedroom | 1 bedroom | 2 bedroom | 3 bedroom | 4 bedroom | 5 bedroom |
|---|---|---|---|---|---|---|
| Schedule I (1998 TAMA) | $285 | $346 | $408 | $510 | $571 | $656 |
| Schedule II (80% of FMR) | $423 | $508 | $604 | $756 | $846 | $982 |

3. As determined by the Chief Executive Officer, Schedule I may be used in redevelopment areas where construction is ongoing and infrastructure is incomplete; or in redevelopment areas where market demands require the use of rental incentives to insure full leasing of units.

## CENTRAL ADVISORY COUNCIL ADMISSIONS OCCUPANCY COMMENTS

| # | Page | Ref. | Central Advisory Council Concerns | Central Advisory Council Responses | CHA Status |
|---|---|---|---|---|---|
| | | | **Comments 09/14/99** | | |
| 1 | 1 | I.A.3.d. | Employees who are residents are often denied benefits on the basis of their employment with CHA or new residents being treated differently than old residents - CHA will do repairs to an apartment prior to a move-in that they never perform on units that ar | Resident repairs should be addresses on a equal basis. Repairs to occupied units should have priority over repairs to unoccupied units. | CHA Agrees |
| 2 | 2 | I.B.2. | CHA staff may be insensitive to applicants with Noted disabilities such as limited reading skills, etc. | CHA should assign non-management advocates to those with disabilities that might affect their ability to participation in the application process, those with language barriers and those with limited reading skills. These advocates should assist throughou | CHA Agrees |
| 3 | 2 | I.B.3. | Has CHA staff been trained to deal with this sensitive application area? If not properly handled this area of the application process may easily intimidate and dissuade persons from applying. | CHA should assign non-management advocates to disabled applicants. Advocates would preferably by disabled residents. | CHA Agrees |
| 4 | 3 | I.B.6. | In order to insure that documents are written in clear and concise language resident input should be used in the development of these documents. | CHA should involve resident leadership in review of these documents before use. | CHA Agrees |
| 5 | 3 | I.C.1. | The CHA has been out of compliance with the structural modification schedule that was agreed to by HUD and CHA in 1994 (Cinema Cummins). | There should be a fixed time period in which CHA must make the apartment of a disabled individual accessible. Often times, disabled individuals are moved into an apartment with the promise that modifications will be made. They are never done. CHA shoul | CHA Agrees |
| 6 | 6 | 1.E.2.f. | This area should specifically address targeting very low income agencies and other institutions. | TANF agencies, homeless shelters, SS offices, the CAC office, LAC offices, Currency Exchanges, churches, schools. | CHA Agrees |
| 7 | 7 | II.B.1. | Contradiction - Pg. 26 Sec VI-D11 | Delete 11.B.1 | CHA Agrees |
| 8 | 8 | II.B.2.c. | What are the standards used for determination -Drug abuse treatment facilities reasonably believes that the individual is currently using illegal drugs??? | Wait for the final rule, however, explicit language such as what the standards are that causes the Authority to determine such use. | CHA Agrees |
| 9 | 8 | II.B.2.d. | What are the standards used for determination-The rule requires that PHA…develop standards that prohibits admission of any household…Does this mean one neighbor lying on another. | Wait for final rule explicit language such as what the standards are that causes the Authority to determine such use-what is reasonable cause. | CHA Agrees |
| 10 | 8 | II.B.2.e.ii. | What is evidence sufficient | Certification from a behavioral science program that documents that the applicant/occupant has completed or is enrolled in a rehabilitation program. | CHA Agrees |
| 11 | 11 | III.B.1.c.(1). | 40% is the minimum requirement for admissions-under QHWRA 98 - CHA is not encouraging low income applicants by offering a percentage parallel to the law - This percentage is to low. | Admissions of low income applicants should be increased to at lease 60%. CHA should provide certain information to the applicants that would help them acquire income. | CHA Agrees |

## CENTRAL ADVISORY COUNCIL ADMISSIONS OCCUPANCY COMMENTS

| # | Page | Ref. | Central Advisory Council Concerns | Central Advisory Council Responses | CHA Status |
|---|---|---|---|---|---|
| 12 | 11 | III.B.1.c.(2) . | 60% admissions for families with 30% to 80% of median income is to high. Additional work needs to be done on the buildings and our resident population, if mixed income is to succeed. | Admissions of families with income between 30% and 80% of median income should be reduced to 60% and 40%. CHA may choose to keep an apartment vacant if there is no one in the 30-80 category seeking housing. Rather than keep the apartment vacant CHA shou | CHA Agrees |
| 13 | 10 | III.A.1. | Applications and information has historically been available in each LAC Office - why should this be discontinued. | Should also be available in the CAC and LAC Offices. | CHA Agrees |
| 14 | 12 | III.C.3.a. | Income should not encourage the vacancy rate. Income should not be a factor in renting a unit - if a unit can be rented to a low income applicant and a mixed income applicant is not available the unit should be rented. | Remove narrative that restricts intake by mixed income property preference. | CHA Disagrees |
| 15 | 14 | III.E.4. | Where did the fingerprint idea come from - Applicants will think they are being treated like criminals. | Delete this section - Would like to eliminate the fingerprints provision, unless it is required by law. If it is required by law, can it be narrowed to only certain circumstances (I.e. when person claims arrest record is inaccurate because someone else u | CHA Agrees |
| 16 | 15 | III.G.1. | RMC's and resident owned businesses do not have the authority to participate in the screening process. When resident perform managerial functions (RMC and resident owned businesses), they should not be involved in home visits process. This is a function | Make corrections…Resident council officers shall be encouraged to become involved in the resident screening and selection process for prospective residents 24CFR964.135G - Screening process must keep management and resident functions separate. | CHA Agrees |
| 17 | 17 | III.G.5. | RMC's are Private Management Corps. | Correction this Section. Delete RMC. | CHA Agrees |
| 18 | 17 | III.G.5.b. | CAC not included in development. | Include CAC - all committees will use a standardized questionnaire developed in conjunction with CHA and CAC. | CHA Agrees |
| 19 | 17 | III.G.5.d. | Does not include ethical and privacy statement. | Residents…provided by the Occupancy Department and sign a statement re: ethical and priority standards. | CHA Disagrees |
| 20 | 17 | III.G.5.f. | WHY - are residents penalized for participating in other volunteer activities or employment. | Delete. | CHA Disagrees |
| 21 | 16 | III.G.3. | According to the CHA/CAC Funding Agreement - every development must have a Screening Committee or AAC. | Re-word first sentence. | CHA Agrees |
| 22 | 20 | IV.4. | A family should not be trapped in a over-housed situation because they were desperate for housing or to comply with housing needs. | Housing should be to for the family size - If a HH chooses because of hardship to be inappropriately housed they should be allowed a transfer to the appropriate size unit when the unit becomes available. | CHA Agrees |
| 23 | 18 | IV.A.2.a. | When a person reaches the legal age of eighteen or 17 and 1/2, they have legal limits of childhood and adolescents. At this stage of life privacy is very important. | Two persons of the same sex might share the same bedroom as long as they fall within the legal limits of childhood and adolescents - Ages 0-17 1/2. | CHA Agrees |

## CENTRAL ADVISORY COUNCIL ADMISSIONS OCCUPANCY COMMENTS

| # | Page | Ref. | Central Advisory Council Concerns | Central Advisory Council Responses | CHA Status |
|---|---|---|---|---|---|
| 24 | 21 | IV.C.1.c. | Need clarity - This mixed pop may lead to a poor balance within the development - Exp-50 elderly 1 disabled. | A balance should be established Exp - not to exceed 60-40%. | CHA Disagrees |
| 25 | 22 | V.A.6. | How is a notification letter mailed - 10 working days is not enough nor is one letter enough. Reinstatement should be considered on a case by case basis and not solely for documented reasons related to a disability. | A notice of apartment offers may be posted in the occupancy office in an area that is available to the public for those who have mail delivery problems or have no phones. Applicants should also be advised of eligibility and suitability by posting at the | CHA Agrees |
| 26 | 24 | V.A.5.b. | No unit with a presence of lead paint should be offered to any applicant - All applicants must be NOTICED that the unit may have high levels of lead. | No lead based paint unit should be offered. | CHA Agrees |
| 27 | 25 | V.E. | Exactly what are these ratios and are they low income resident friendly. | If not low income resident friendly - delete. | CHA Agrees |
| 28 | 26 | V.F. | Who established the specific requirements and who approves them - an how can the right to return relate to someone who has been displaced, or technically never left the public housing role. | Needs to be carefully worded and researched by CHA and CAC legal to insure the protection of the displaced resident under URW and other statutory protections. | CHA Agrees |
| 29 | 28 | VI.C.4. | Why should residents be penalized - Is the concern that Live-in-Aides income is not considered when calculating rent - this needs discussion and resolution. | A relative who becomes a resident by virtue of functioning as a live-in-aide should be able to sign the lease as an additional family member and be entitled to the benefits and obligations that entails. Delete. | CHA Agrees |
| 30 | 31 | VI.D.11. | Contradiction - Sec. 11 B 1 | Please correct. | |
| 31 | 32 | VII.A.1.c. | How is this determined without bias. | A standardized process to determine fault should be established by Operations and agreed to by the resident jurisdiction wide organization - All residents should have review and comment on this process before it is implemented. | CHA Disagrees |
| 32 | 33 | VII.2.c. | With the consolidation and relocation concerns it is important to prioritize Administrative Transfers. | Preference should also be given to displaced families. | CHA Agrees |
| 33 | 33 | VII.2.c. | This may unfairly limit housing choices for residents who fell on hard times and had to use the CHA endorsed repayment plan. | Since the repayment plan is a CHA initiatives developed to insure the continued occupancy of good residents - it should be noted that those residents who have paid in accordance with the repayment plan should not be penalized. | CHA Agrees |
| 34 | 34 | VII.B. | We are concerned about the good standing clause in this section especially those residents who have been on the CHA repayment plan. | Resident initiated transfers should be allowed for residents who have completed or are currently on a repayment plan and have paid or are paying as directed. | CHA Agrees |
| 35 | 37 | VIII.E.3. | Why should a resident have to move, since we are encouraging mixed income??? | CHA should encourage residents to move to ceiling or flat rent so they may be included in a new income mix. | CHA Disagrees |

## CENTRAL ADVISORY COUNCIL ADMISSIONS OCCUPANCY COMMENTS

| # | Page | Ref. | Central Advisory Council Concerns | Central Advisory Council Responses | CHA Status |
|---|---|---|---|---|---|
| 36 | 38 | VIII.F.3. | Residents that are employed are not included in the income disregard program. | Residents who receive a substantial increase in salary should be encouraged by the income disregard program and included. | CHA Disagrees |
| 37 | 39 | VIII.G and H. | Residents may notify CHA of increases but not receive adjustments in rents until months later and are then required to pay large balances due to CHA error. | CHA should be responsible for making the appropriate adjustments (30 days after receipt of information) if rent adjustments are not made within the defined time and former rents are paid at the request of the CHA - the error in rent due should not be the | CHA Agrees |
| 38 | 40 | VIII.J.2. | This is completely unfair and discourages continued occupancy by family members. It may also so burden a young person taking over family responsibilities that it impacts his/her chance for success. | Please delete this unreasonable requirement. | CHA Disagrees |
| 39 | 40 | VIII.J.2.e. | As above. | Please delete this unreasonable requirement. | CHA Disagrees |
| 40 | 41 | IX.B.3. | Residents are concerned about the confidentiality factor as relates to what resident information is now available to the CHA under QHWRA. | Tenant historical log should be available for tenant review and may also be copied by the tenant. QHWRA states that the Tenant historical log may not contain information gained from drug rehabilitation centers or law enforcement agencies. This should be | CHA Agrees |
| 41 | 48 | XII.B.10. | Does not include meeting reimbursement for duty elected Local Advisory Council and Central Advisory Council officials. | Add…maintenance, meeting reimbursement and resident-initiative coordination. Optional to delete. No resident may receive more than one stipend at a time - this statement may mislead as stipends and meeting reimbursements are mistakenly thought to be one | CHA Agrees |
| | | | | | |
| **Comments 09/30/99** | | | | | |
| | | | | | |
| 42 | 7 | II.A.1. | Provide no specific direction on how to be implemented and could subject to abuse by CHA Occupancy Department | Strike language. | CHA Disagrees |
| 43 | 7 | II.A.2.e. | Should specify the number of units that will be allocated for that purpose. QHWRA Sec. 524. | Specify number of units. | CHA Agrees |
| 44 | 8 | II.B.2.a. | Should not serve as an automatic bar for eligibility. Should be considered as a factor in determining applicants ability to pay rent. | Strike quoted language. | CHA Disagrees |
| 45 | 8 | II.B.2.b. | Fails to track QHWRA Section 576(a) which states that "Any tenant evicted from federally assisted housing" is subject to such bar. Household members are not included. Where Congress intended that household members are to be covered, it so indicated. Se | Strike quoted language and insert "leaseholder." | CHA Agrees |

## CENTRAL ADVISORY COUNCIL ADMISSIONS OCCUPANCY COMMENTS

| # | Page | Ref. | Central Advisory Council Concerns | Central Advisory Council Responses | CHA Status |
|---|---|---|---|---|---|
| 46 | 8 | II.B.2.b. | QHWRA Section 576 requires an exception to this 3-year bar: "unless the evicted tenant successfully completes a rehabilitation program approved by the public housing agency." | Insert the quoted Section 576 language into this section. | CHA Agrees |
| 47 | 8 | II.B.2.d. | Fails to track QHWRA Section 576(b)(1)(B). Employees are not covered. | Strike quoted language. | CHA Disagrees |
| 48 | 8 | II.B.2.e. | QHWRA Section 576(c) provides that an applicant who has engaged in such activity "during a reasonable time preceding the date when the applicant would otherwise be selected for admission" shall be ineligible. Three years is not a reasonable time. | Strike "three (3)" and insert "two (2)". | CHA Disagrees |
| 49 | 8 | II.B.2.e. | CHA's "determination" of criminal activity should be limited to finding a history of criminal convictions due to the near-mandatory nature of this admissions bar. CHA can still consider history of arrests as an admissions factor, as per § II.E.4. | Must state how CHA "determines" certain criminal activity. | CHA Disagrees |
| 50 | 8 | II.B.2.e. | It is impossible for the applicant to prove a negative. | Must state what evidence is "sufficient." Sufficient evidence should be an absence of relevant criminal convictions during the time period. | CHA Disagrees |
| 51 | 9 | II.B.5. | Fails to track QHWRA Section 576(b)(2) which does not include quoted language. | Strike quoted language. | CHA Disagrees |
| 52 | 10 | III.B.1. | Elderly and disabled are already entitled to automatic "preferences" in elderly/disabled buildings. | Strike preference for elderly and disabled. Retain preference for displaced singles. | CHA Disagrees |
| 53 | 11 | III.B.1.c.(2) . | QHWRA Section 514 requires that local preferences be based "upon local housing needs and priorities." This preference fails to meet the needs of extremely low-income families. | Lower preference to 40%. | See #11 & 12 |
| 54 | 10 | III.B.1. | New preferences for 1) documented victims of domestic violence and 2) applicants whose children are at risk, should be created. Use same language in III.B.2.a. and III.B.2.b. | Move language in III.B.2.a and III.B.2.b. to this section on preferences. | CHA Disagrees |
| 55 | 11 | III.B.2. | Delete this section. Move subsections a and c to section on preferences. Subsection c is already covered by preference for families making 30-80% of area median income. | Same. | CHA Disagrees |
| 56 | 11 | III.C.2. | Oftentimes, applicants cannot be reached by telephone (because they no longer have one) or regular mail. | Notification should include certified mail. | Pending |
| 57 | 12 | III.C.3.a. | § 960.205(c) mandates that a "dwelling units should not be allowed to remain vacant for the purpose of awaiting application by a family falling within the appropriate [income] range." | The mandate of 960.205(c) should be inserted in this provision to clarify that intake can not be closed to await a higher income family when vacant units are available to be filled. | CHA Disagrees |
| 58 | 13 | III.D.4. | Such family expense forms are demeaning. Zero income applicants get short-term help from friends and relatives which is impossible to reduce to a static budget sheet. Instead, the CHA can use the social security number and consent forms provided by the | Strike the first sentence of this section. | CHA Disagrees |

## CENTRAL ADVISORY COUNCIL ADMISSIONS OCCUPANCY COMMENTS

| # | Page | Ref. | Central Advisory Council Concerns | Central Advisory Council Responses | CHA Status |
|---|---|---|---|---|---|
| 59 | 15 | III.G.2. | The specific mitigating factors of 960.205(d) should be included in the policy because CHA staff do not always have immediate access to the federal regulations. | Insert mitigating factors. | CHA Agrees |
| 60 | 18 | IV.A.1. | As written, it is unclear whether the "Minimum-Number of Persons-Per Unit Standard" (MNPU Standard) is absolute, or allows for exceptions. If it does not it could allow for some results which are both absurd and which conflict with the standards set fort | For example, under the MNPU Standard a grandmother, mother, 16-year-old son and 10-year-old daughter would only get a 3-bedroom unit, although logic and CHA's own Occupancy Standards would dictate a 4-bedroom unit. An exception to the MNPU Standard shoul | CHA Agrees |
| 61 | 22 | V.A.3. | Concerned that waiting lists are not being properly monitored and that families are being improperly placed at the top of the list. | The CAC and the LACs must be allowed to monitor the waiting lists. Insert "CHA and the LACs" after CHA. Add after the first sentence. "The CAC and the LACs shall be provided monthly reports by the Occupancy Department on the status of the waiting list. | CHA Disagrees |
| 62 | 24 | V.A.11.b. | No age specified in policy. | Specify the age in policy. | CHA Agrees |
| 63 | 26 | V.F. | (1) Priority for displaced families should apply to rehabilitation and new construction<br>(21) Priority should be for redeveloped housing on-site or in the immediate neighborhood<br>(3) There should be no qualification to the right to return as long as the res | (1) Insert "including rehabilitation and new construction" after "If CHA is involved in redeveloping areas."<br>(2) Insert "on-site or in the immediate neighborhood" after "priority for new housing"<br>(3) Strike "subject to the specific requirements of approve | CHA Agrees |
| 64 | 31 | VI.D.11. | This policy would prevent unauthorized occupants from being added to the lease where the unit is over-crowded. Such a policy would discourage the prompt reporting of authorized occupants. This proposed policy would put the unauthorized occupant in a "ca | State in this section that an "unauthorized occupant" shall be considered "an extenuated circumstance" and that such a person shall be added to the unit and then promptly processed for a split family transfer. | CHA Disagrees |
| 65 | 32 | VII.A. | Residents relocated due to demolition, rehabilitation, consolidation, conversion to tenant-based assistance, court order, or CHA failure to provide basic services or habitable housing, are not properly protected. | The A&O Policy must contain the protections set forth in the CHA Leaseholder Housing Choice and Relocation Rights Contract. a copy of which is attached hereto. | Pending |
| 66 | 32 | VII.A.1. | CHA may use emergencies to transfer residents without prior notification. | The CHA should notify residents in certain instances. | CHA Agrees |
| 67 | 32 | VII.A.2. | Thirty days notice is not enough especially when the CHA intends to consolidate housing or close certain buildings. | | CHA Agrees |
| 68 | 34 | VII.A.5.b. | The CHA may give preference to new applicants as opposed to current residents who request transfers. The CHA should devise a system that gives priority to current residents who request transfers. | One of the site-based waiting list should be a site based transfer waiting list that gives preference to split transfer requests due to family size.<br><br>A Current resident who meets all the transfer to relocation requirements including good housing habits sh | CHA Agrees |
| 69 | 37 | VIII.E.3.b. | The meaning of this section is unclear. | Delete or explain what local law is being referred to. | CHA Agrees |

## CENTRAL ADVISORY COUNCIL ADMISSIONS OCCUPANCY COMMENTS

| # | Page | Ref. | Central Advisory Council Concerns | Central Advisory Council Responses | CHA Status |
|---|---|---|---|---|---|
| 70 | 44 | XI.A-F. | Ceiling and flat rents should be one figure, the lower of the two. Fair market value of a unit should be based upon the public housing community, to avoid places like Cabrini having high FMV because of surrounding neighborhood. Tenants should be told of | See CAC Rent Provisions Recommendations, attached hereto. | CHA Agrees |
| | 44 | XI.C. | | **Paragraph C** | |
| | 44 | XI.C. | | Recommendation 1 | CHA Disagrees |
| | 44 | XI.C. | | Recommendation 2 | CHA Disagrees |
| | 44 | XI.C. | | Recommendation 3 | CHA Agrees |
| | 44 | XI.C. | | Recommendation 4 | CHA Disagrees |
| | 44 | XI.E. | | **Paragraph E** | CHA Disagrees |
| | 45 | XI.F. | | **Paragraph F** | |
| | 45 | XI.F. | | Recommendation 3 | CHA Disagrees |
| | 45 | XI.F. | | Recommendation 4 | CHA Agrees |
| | 45 | XI.F. | | Recommendation 5 | CHA Agrees |
| | 45 | XI.F. | | Recommendation 6 | CHA Disagrees |
| | | | | | |
| 71 | | XII. | See CAC Rent Provisions Recommendations, attached hereto. | Definitions section of the Admissions and Occupancy Policy | |
| | 50 | 50 | | XII.C. | Pending |
| | 50 | 50 | | XII.D. | CHA Agrees |
| | 52 | 51 | | XII.E.1.a. | CHA Agrees |
| | | 51 | | XII.E.1.b. | CHA Disagrees |
| | | New | | XII.E.1.d. | Pending |
| | | New | | XII.E.1.e. | Pending |
| | | New | | XII.E.1.f. | CHA Disagrees |
| | | New | | XII.E.1.g. | CHA Agrees |
| | | 53 | | XIII.E.2.a. | CHA Disagrees |
| | | 53 | | XII.E.3.a. | CHA Disagrees |
| | | 54 | | XII.E.3.b. | CHA Disagrees |
| | | 54 | | XII.E.3.c. | CHA Disagrees |
| | | 55 | | XII.E.3.d. | CHA Agrees |
| | | 55 | | XII.E.3.e. | CHA Disagrees |
| | | New | | New recommendation | CHA Disagrees |
| | | | | XII.F.1. | CHA Disagrees |
| | | | | XII.F.2. | CHA Agrees |

## CENTRAL ADVISORY COUNCIL ADMISSIONS OCCUPANCY COMMENTS

| CHA Response |
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| CHA agrees that repairs should be completed equitably. However, this is a management issue. The CAC's concern is directed to a poor management practice regarding repairs that do not rise to the level of a fair housing concern. "New" or "Old" residents |
| CHA agrees to insert additional language into the A&O. However, the CHA will not agree to assign advocates to be available in case an applicant experiences reading comprehension difficulties during the application process. CHA is also conducting sensi |
| CHA agrees to insert additional language into the A&O. |
| CHA agrees to insert additional language into the A&O. |
| CHA agrees to insert additional language into the A&O. |
| CHA agrees to insert additional language into the A&O. |
| CHA agrees to incorporate language into the A&O. However, the CHA disagrees with the CAC. As written the document is intended to provide residents with unauthorized guests the option to add the person to the household. If the addition to the household r |
| CHA agrees to insert additional language into the A&O. |
| CHA agrees to insert additional language into the A&O. |
| CHA agrees to insert additional language into the A&O. |
| CHA agrees with the CAC and believes that requirements for mixed income communities are best served by increasing the admission percentages in the policy. 50% of all new admissions at or below 30% of the area median, and 50% of all new admissions between |

## CENTRAL ADVISORY COUNCIL ADMISSIONS OCCUPANCY COMMENTS

| CHA Response |
| --- |
| CHA agrees with the CAC and believes that requirements for mixed income communities are best served by increasing the admission percentages in the policy. 50% of all new admissions at or below 30% of the area median, and 50% of all new admissions between |
| CHA agrees to insert additional language into the A&O. |
| CHA disagrees with the CAC. The right to close the waiting list by income range is vested with property management. This does not mean that vacancies will not be filled. If the vacancy numbers are high at a property the waiting list will likely remain ope |
| CHA agrees to insert additional language into the A&O. |
| CHA agrees with the CAC and the references to RMC and resident-owned businesses will be stricken from this paragraph. The intent of this paragraph should be that the LAC will work with the property manager regarding home visits. |
| CHA agrees with the CAC and the reference to the RMC will be deleted. |
| CHA agrees to insert additional language into the A&O. |
| CHA disagrees with the CAC. An ethical and privacy statement is required. See F.2. Page 14, and F4.2, page 15 of the A&O Policy. |
| CHA disagrees with the CAC. The purpose of subsection 4f is to avoid allowing a few individuals to have control over the entire process. |
| CHA agrees to insert additional language into the A&O. |
| CHA agrees to insert additional language into the A&O. |
| CHA agrees to insert additional language into the A&O. |

## CENTRAL ADVISORY COUNCIL ADMISSIONS OCCUPANCY COMMENTS

| CHA Response |
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| CHA disagrees with the CAC. CHA references Section IV C 1 (c) page 18 of the policy. This section will be reworded to make it clear that no building can establish a quota or ratio for admission of families with disabilities vs seniors. Such percentage re |
| CHA agrees to insert additional language into the A&O. |
| CHA agrees – Ideally no unit with lead should be offered to family with children under age 7. However, in the event such an offer occurs the policy as written is intended to protect the family's place on the waiting list by being clear that refusals for l |
| CHA agrees to insert additional language into the A&O. |
| CHA agrees to insert additional language into the A&O. |
| CHA agrees to insert additional language into the A&O. |
| CHA agrees to insert additional language into the A&O. |
| CHA disagrees with the CAC. Property Management is responsible for determining if a charge is required. The resident is entitled to grieve the charge if he or she feels it has been misapplied. |
| CHA agrees with the CAC. Type 1 Administrative Transfers are mandatory transfers for the purposes of : assisting displaced families from existing developments (which is explained more fully in V. F., implementing redevelopment or building rehabilitation |
| CHA agrees to insert additional language into the A&O. |
| CHA agrees to insert additional language into the A&O. |
| CHA disagrees with the CAC. The language provided is almost verbatim from the regulations. The language on page 31 of the policy is actually intended to "keep" families in public housing as income increases by restricting the situations when the CHA could |

## CENTRAL ADVISORY COUNCIL ADMISSIONS OCCUPANCY COMMENTS

| CHA Response |
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| CHA disagrees with the comment in that the issues are already covered by the policy. The section noted (VIII F) already includes a reference to the income disregard program. Keep in mind that someone already employed who receives an increase in pay IS NOT |
| CHA agrees to insert additional language into the A&O. |
| CHA disagrees. However CHA will modify the language as follows: "Although the CHA requires the remaining adult family member 18 or older to be responsible for the uncollected debt of the former head of the household, the CHA will enter into a payment plan |
| CHA disagrees. However CHA will modify the language as follows: "Although the CHA requires the remaining adult family member 18 or older to be responsible for the uncollected debt of the former head of the household, the CHA will enter into a payment plan |
| CHA agrees to insert additional language into the A&O. |
| CHA agrees to insert additional language into the A&O. |
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| CHA disagrees. The language on housing of last resort is intended to send a message to the community at large that admission to public housing is not automatic and that families must meet both eligibility and suitability criteria. No change is recommended |
| CHA agrees. |
| CHA disagrees with the CAC. As further explanation, it is the CHA's policy that an applicant's rent history with other housing authorities or Section 8 programs will be a determinative factor in whether the applicant is eligible for admission in the CHA. |
| CHA agrees to insert additional language into the A&O. |

## CENTRAL ADVISORY COUNCIL ADMISSIONS OCCUPANCY COMMENTS

| CHA Response |
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| CHA agrees to insert additional language into the A&O. |
| CHA disagrees with the CAC. The language is patterned after QHWRA Section 576 (c) and existing regulations at 24 CFR 966.4 (f) 12 (I) (A). |
| CHA disagrees with the CAC. No change is recommended. Further, the language is consistent with other references in the policy. |
| CHA disagrees with the CAC. However, CHA will add the following sentence to the last sentence of II B (c). See pages 5 - 9 of the CHA's Screening Procedures, Appendix C of the A&O Policy for more specific criteria regarding what constitutes "sufficient |
| CHA disagrees with the CAC. However, CHA will add the following sentence to the last sentence of II B (c). See pages 5 - 9 of the CHA's Screening Procedures, Appendix C of the A&O Policy for more specific criteria regarding what constitutes "sufficient |
| CHA disagrees with the CAC. Consumption of alcohol is legal. This is an issue for the CHA only when the behavior resulting from use rises to the level of a lease violation, e.g. vandalism, assault, etc. |
| |
| Reference #11 and 12 which will identify changes that CHA has made regarding this issue. |
| CHA disagrees with the CAC therefore, no changes are recommended. |
| CHA disagrees with the CAC therefore, no changes are recommended. See IIIB 2a. |
| CHA will consider the recommendation, however with the use of certified mail cost is an issue. |
| CHA disagrees with the CAC. This section of the existing rules are superceded by QHWRA which permits skipping to achieve an income mix. |
| CHA disagrees with the CAC therefore, no changes are recommended. |

## CENTRAL ADVISORY COUNCIL ADMISSIONS OCCUPANCY COMMENTS

| CHA Response |
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| CHA agrees to insert additional language into the A&O. |
| CHA agreed to make changes to the policy to clarify how persons-per-unit standards should be applied. However, the CAC recommended a more generous bedroom allocation standard than the CHA, therefore, language has been added to the A&O as a compromise bet |
| CHA disagrees with the CAC therefore, no changes are recommended. |
| CHA Agrees. |
| CHA agrees to insert additional language into the A&O. |
| CHA has added language for unauthorized occupants. |
| The Relocation Rights Contract should be subject to separate negotiations. CHA is not opposed to the concept but needs time to review and consider the draft presented by the CAC. CHA will negotiate the terms of this contract separately and if needed inc |
| CHA agrees that when feasible, the CHA will advise residents as soon as the need for an emergency transfer is identified. |
| CHA agrees to insert additional language into the A&O. |
| The split-family transfer is already covered in the Administrative section and does receive a priority over new admissions. CHA can establish ratios by waiting list for resident-initiated transfers versus new admissions. Currently all categories except |
| CHA Agrees with CAC, however, this is a requirement quoted from HUD regulations. Language is intended to keep higher-income families in public housing. |

## CENTRAL ADVISORY COUNCIL ADMISSIONS OCCUPANCY COMMENTS

| CHA Response |
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| CHA agrees to insert additional language into the A&O. (See XII.D. -- page 50) |
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| CHA disagrees with CHA and declines to make changes. |
| CHA disagrees with CHA and declines to make changes. |
| CHA agrees to insert additional language into the A&O. |
| CHA disagrees with CHA and declines to make changes. |
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| CHA agrees to insert additional language into the A&O. (See XII.d. -- page 50) |
| CHA agrees to insert additional language into the A&O. (See XII.d. -- page 50) |
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| CHA agrees to insert additional language into the A&O. (See XII.d. -- page 50) |
| CHA agrees to insert additional language into the A&O. (See XII.d. -- page 50) |
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| CHA agrees to insert additional language into the A&O. (See XII.d. -- page 50) |
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| CHA agrees to insert additional language into the A&O. (See XII.d. -- page 50) |
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| CHA agrees to insert additional language into the A&O. (See XII.d. -- page 50) |

Chicago Housing Authority
Agency One Five Year Plan
Central Advisory Committee Comments

| Comment/*Source* |
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| The service connector model is a dangerous change - history has shown that CHA residents have been under served by most social service agencies. CHA should continue resident programs at current levels of funding until a responsible transition to social s |
| The CAC objects to the slashing of the budget for resident services, particularly the $9 million cut in Resident Development - the Victim Assistance Program, Small Businesses initiative, and training of RMC's are all successful and necessary programs. *Ju* |
| Under Section 512 of QHWRA, each adult resident must contribute 8 hours per month of community service or participate in a self-sufficiency program for 8 hours per month. The CAC opposes any attempt by the CHA to impose the economic self-sufficiency requ |
| As part of its deconcentration policy, the CHA should offer incentives to lower-income tenants, including: giving priority to Section 3 training slots, providing escrow savings accounts, creating additional exclusions to earned income, providing after sc |
| The CAC is distressed that out of the $1.5 billion it plans to spend on redevelopment, only $20 million will be spent on a resident apprenticeship program. The CAC recommends an additional $20 million be spent. *Willie Burrell, CAC Secretary* |
| 20% of the $1.5 billion in development money should be awarded to Resident Owned Businesses, and another 40% to MBE/WBE's. *Willie Burrell, CAC Secretary* |
| For all other contracts in the 10 year redevelopment period, 20% should be awarded to Resident Owned/Section 3 eligible Businesses, 40% to MBE/WBE's, and individual contracts to ROB's up to $1 million. *Willie Burrell, CAC Secretary* |
| The CAC should be allowed a 90 day startup period to research, document, and develop its Community Service Requirement (CSR) plan. Residents should be allowed proper notice (30 days) before implementation of the plan. Notice should be given to advise re |

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| CHA shall meet with government agencies to establish Memorandums of Understanding to provide for such agencies transferring information to facilitate the CSR. The agreement between SSI and TANF will state in part that any family who has appealed a welfar |
| The CHA shall meet with government agencies to establish Memorandums of Understanding to provide for such agencies transferring information to facilitate the CSR. The agreement between SSI and TANF will state in part that any family who has appealed a we |
| The CHA and CAC/LAC shall identify those self-sufficiency activities that meet CSR in each agency in each community. MOU's shall be established outlining expectations from all partners and the anticipated outcomes per community. |
| The CAC/LAC's should administer the CSR program. |
| The CSR appears to violate the Emancipation Proclamation. |

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| The CHA fails to include a deconcentration objective when describing its goal to provide an improved living environment. |
| The CAC is concerned that the CHA has proposed a plan that will so heavily rely on the demolition of existing housing and Section 8 voucher program to accommodate its displaced residents, without first awaiting the results of the Regional Rental Market An |
| The Plan does not focus on families making less than 30% of AMI and fails to describe the strategies it will use to address this population. |
| The redevelopment plan identifies $1.5 billion over the next 10 years, which it will use to rehabilitate or build 24,000 units. However, this averages out to only $60,000 per unit, well below what such a project will cost. The CAC is concerned CHA is mi |
| The CHA claims it will rehab/rebuild 24,000 units, but cannot support its claim due to Gautreaux's limitation on the number of units that could be built back on site. Even if CHA gets a waiver to this, at least one half of the units would have to be rese |
| The Plan does not mention Gautreaux and how residents will be able to come back to the rehabbed/rebuilt units. |
| CHA should award 10% of all contracts to ROB's. |
| The Plan, which seeks to demolish close to 17,000 units, fails to address the worsening affordable housing crisis in Chicago. *Mamie Bone, Chairperson* |
| The units not slated for demolition will not be targeted toward the families with the greatest need - under the Plan 60% of the new units would go to families between 30% and 80% of AMI, even though over two-thirds of renters with severe housing problems |

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| The Plan does not discuss how CHA will deconcentrate poverty by assuring access for lower income families into higher income developments. *Mamie Bone, Chairperson* |
| The CAC/RAB calls for one for one replacement of demolished units. *Mamie Bone, Chairperson* |
| The residents must be a part of, and CHA must ensure technical assistance to residents for meaningful in participation in, the rehabilitation/redevelopment process categories 1 and 2. *Mary Wiggans, LAC President, Washington Park* |
| CAC concern over the demolition of 525 scattered site units in category 4 with no justification, and the demolition of 733 units in other buildings in category 4. *Mary Wiggans, LAC President, Washington Park* |
| Let the people stay in the area, but the buildings are awful. People from the "projects" are more stigmatized than any other. *Section 8 RAB Participant* |

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| The CAC recommends that not less than 20% of the dollar value of all private management contracts should go to RMC's and ROB's. *Willie Burrell, CAC Secretary* |
| As part of the evaluation criteria of the RFP for management services, between 15 and 25 points should be awarded for RMC's and ROB's that currently manage CHA properties and submit proposals. *Willie Burrell, CAC Secretary* |
| 25% of the dollar value of all private management dollars should be awarded to MBE/WBE's. *Willie Burrell, CAC Secretary* |
| RMC's should be able to continue managing their developments and should not be subject to the procurement process. |
| Some of the private and/or resident managers are ignoring residents' requests for services or information. The committee believes that under QHWRA, the residents can receive some relief. |
| The committee is concerned that the CAC may be excluded from the contracting process. The CAC should participate in the contracting process especially the qualifying selection process. |
| The committee is concerned that all RMCs may be eliminated from managing any CHA developments if they are not excluded from the bidding process. The committee recommends that the CHA maintain all RMC contracts and that the CHA should provide resources to |

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| The committee is concerned that the CHA has not standardized the maintenance charges. The committee believes that the CHA should have standardized maintenance charges. For example, the maintenance fees are too high especially the cost to replace a refri |
| The CHA has not changed damaged doors, cabinets, mailboxes, windows, thermostat and other fixtures for 5, 10, or 50 years. Why should residents pay for such fixtures? The maintenance fees need CAC input. |

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| The residents are concerned that CHA may charge them for items that have been reported as work orders due to normal wear and tear. What will be the procedure for determining why the resident will be responsible? The committee is concerned that the CHA i |
| The committee is concerned about the CHA having sole discretion to decide if a matter will be heard by an officer or grievance panel. The residents must be granted some kind of choice. |
| The committee is concerned about the fairness of grievance panel members. The CHA should reconsider the composition of grievance panels. |
| The committee is concerned that confidential information provided or turned over to the grievance panel may not be kept confidential. The CHA should consider inclusion of a confidentiality provision in the procedures. |
| The committee is concerned that the CHA may use emergencies to transfer residents without prior notification. The committee believes that the CHA should notify residents in certain instances. |
| Thirty days notice is not enough, especially when the CHA intends to consolidate housing or close certain buildings. (Demolition - The CHA will inform the CAC and LAC as soon as a regular or interim demolition application is filed). (Consolidation - T |
| The committee is concerned that the CHA may give preference to new applicants as opposed to current residents who request transfers. The CHA should devise a system that gives priority to current residents who request transfers. |
| The CHA has not defined what types of pets will be allowed in public housing. The committee believes not-domesticated animals should not be allowed in public housing. |
| The committee is concerned that CHA employees do not make such changes for several months and then include retro payments on subsequent rent bills. The residents should not bear the responsibility of a CHA employee's negligence. |
| The committee is concerned that the CHA is maintaining high vacancy rates and very long turn around times. The CAC desires to work with CHA to resolve this problem. |

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| Why does the CHA maintain long waiting lists when apartments are either ready for rent or could be made ready for rent within a short time? Several developments are not leasing. |
| The CHA should not close the family waiting list. |

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| A Public Housing Fights Back program should be instituted to attack the problem of gangs and violence in public housing communities. This effort should include the DOJ, FBI, DEA, Cook County Sheriff's Office, and the CPD. |
| The tenant patrol program must be continued and improved. The improvements should include: expanded training, background checks, random drug testing, uniforms, anonymous reporting process for reporting violations, insurance on participants, increased re |

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| Initial lease terms must not be shortened. |
| CHA should consider equitable circumstances when deciding whether to evict a household member for a guest's criminal activity. |
| Because Chicago has an unusually high number of very low-income families, the income targeting ceiling should be lowered so that at least 75% of families receiving Section 8 vouchers in any fiscal year must earn or receive 20% or less of the AMI. |
| The payment standard should be raised to 110% of FMR to make it easier for voucher holders to find housing in desegregated areas with a low concentration of poverty. |
| The time for requesting a grievance hearing to contest any proposed adverse action should be extended to thirty days after notice of CHAC's intention to take such action. |
| The Administrative Plan should explicitly state that CHAC may not deny or terminate assistance on the grounds that a household member or guest has engaged in drug-related or violent criminal activity unless the head of household knew, or should have known |
| The Administrative Plan should describe the steps CHAC must take to help a family find suitable new housing when the HAP contract is terminated on just 24-hour notice because the landlord has failed to correct a life-threatening situation. |
| Applicants and participants who want to challenge an adverse action (or proposed adverse action) should be given 30 days within which to request an informal review or hearing. |

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| Residents must shuffle from unit to unit due to condo conversions and bad conditions maintained by slumlords -- this is particularly rough for children in school. We need stable apartments with good landlords. Can CHA help make good apartments available |
| Landlords often see young women with children and no husbands, and assume that they have boyfriends who will bring trouble, or that their children will cause it. They discriminate against families and young mothers. They won't take teenagers, and see yo |
| There is very little availability in many areas of the city -- trying to find a unit in an area that you know or where you have family may be difficult. What can CHA do to increase availability? |

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| Tenants don't know how their certificates and vouchers work, or how to pay their own utilities or maintain their units as private market renters. Need assistance in getting used to their new responsibilities. |
| What happens to a Section 8 resident who leaves a job to go to school full-time -- does she lose her Section 8 certificate? |
| Confidentiality an issue on recertifications -- CHAC sends letters to peoples' jobs to recertify income. One tenant had the letter forwarded to the personnel department of her corporate office, which sent it back to the local office -- by the time her in |
| Supportive services are necessary for many Section 8 residents -- people need counseling for drugs, need to get involved in schools and in their children's' lives, job training and placement. The Family Self Sufficiency program is a help, but has stepped |
| In some cases Section 8 tenants get charged more than others. Is this because they are considered high-cost tenants? |
| It would help people get through self sufficiency work if a job were waiting at the end of their training and self-improvement program. Is this possible? |
| A funded program for service provision in Oak Park floundered for lack of participation since the word did not get to Section 8 and other poor community residents. The program may have to close its doors because it did not have the ability to fund the on |
| Inspectors for housing standards are slow and difficult to schedule. They are told to deal with the landlords, but the tenants get caught in the middle since they are the ones who pay for delays because they can't move in or recertify. Tenants may also |
| Inspection times a big problem -- one participant lost an apartment while waiting because the landlord rented it to another family in the meantime. |

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| Inspections after the initial apartment rental should be more rigorous -- some people keep filth, some tear up apartments. Need to make sure there are consequences for such behavior. Tenants could work with inspectors and assist with enforcement. |
| Home ownership opportunity would be a great thing. Can residents wean off the Family Self Sufficiency program and find homes? |
| Landlords can just raise rents on Section 8 residents and so discriminate. |
| Tenants need better information regarding the program and what happens when their lease runs out. Some have leases that automatically became month-to-month after the first term. Don't know or understand that the lease runs out. Automatic renewals are n |
| 6 months lease is a useful thing if a family is looking for an apartment and can't find anything, but needs to leave the old one. You wouldn't unpack, just have a roof over your head and keep looking. This is a good option to keep for those looking for |
| People need reasonable procedures for grievances against lease enforcement that could cause them to lose their housing, but landlords and others need to enforce against those that are hurting others and making it hard for them to live in the property. |

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| For hearings affecting Section 8 program participation, CHAC agrees to extend the time to request an informal hearing to 30 days from the date of notification. CHA will encourage landlords to evict problem tenants for the good of other Section 8 residents |
| CHA has not responded to CAC's request to make a good faith effort to negotiate an MOU with the affected LAC's regarding conversion to Section 8, demolition, rehabilitation, or consolidation. |

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| The goals and objectives in the CHA five-year plan fail to provide quantifiable goals as required by federal regulation. |
| The CAC is concerned that, with respect to the Civil Rights Certifications, the Plan's heavy reliance on reduction of housing stock will have a discriminatory impact on African-Americans, women, children, and people with disabilities; and will perpetuate |
| The MOU between CHA and HUD guarantees one for one replacement with rehabbed units and Section 8 vouchers which, given Gautreaux, may be the only way to guarantee a unit for all despite CHA's promises. |

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| CHA requests the authority to establish reasonable rent policies. Because CHA fails to explain what rent policies it is referring to, the CAC objects to the waiver. |
| CHA wants to replace the existing Family Self-Sufficiency Program with a locally determined program. Because CHA fails to provide any detail on what that program would look like, the CAC objects to this waiver. |
| CHA requests the authority to tie housing assistance to self-sufficiency. Again, because CHA provides no detail, CAC objects to this waiver. |
| The CAC cannot support the Augmentation of the Viability Test waiver unless and until CHA provides the CAC with documentation of its failure of the viability test. |

| CHA Response |
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| CHA's service connector model will be more effective in helping residents access a variety of youth, adult, and senior services already available in the community. Service coordinators will be located at each property. This change will result in an equi |
| CHA will increase the amount of funds dedicated to programs through the newly created fundraising unit in the Finance Department. Through its efforts, CHA will develop new, collaborative funding and programming resources for public housing residents. Wh |
| The CHA cannot require any resident subject to the community work requirement to contribute more than 8 hours per month. Therefore, the CHA has deleted this request from the List of Commitments, Waivers and Requests. |
| CHA will increase access by public housing residents to the array of services aimed at increasing economic self sufficiency. |
| The $20 million allocated for an apprenticeship program is considered to be only a part of the Section 3 hiring commitment that the CHA anticipates as part of its $1.5 billion capital program. CHA or its designee will work with resident leadership to des |
| The CHA will meet its Section 3 and MBE/WBE goals. The $20 million allocated for an apprenticeship program is considered to be only a part of the Section 3 hiring commitment that the CHA anticipates as part of its $1.5 billion capital program. |
| The CHA will meet its Section 3 and MBE/WBE requirements. |
| The CHA will work with the residents to develop an approach to implementing the CSR. The waiver which requested residents paying ceiling rents be exempt from the CSR would not be approved. Therefore, CHA did not include it in the List of Commitments, Wa |

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| The CHA is willing to work with the residents to develop an approach to implementing the CSR. The comment will be noted as we move toward implementation. |
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| The CHA is willing to work with the residents to develop an approach to implementing the CSR. The comment will be noted as we move toward implementation. |
| The CSR was mandated by Congress in the Quality Housing and Work Responsibility Act of 1998. |

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| The CHA does not have higher income public housing developments. The Plan addresses deconcentration by: the planned physical improvements to CHA properties, the concepts listed in the Section 8 waivers, the increasing of Fair Market Rents, the increasin |
| The Regional Rental Market Analysis has shown that there are enough units in the region that are affordable for people earning up to 60% of area median income to accommodate the estimated number of CHA relocatees (approximately 1,000 per year for 5 years) |
| The CHA Plan addresses the needs of very low income families, as over 90% of current CHA families have incomes between 0-30% of AMI. |
| The CHA based the number of units on the average of dollars per unit for both minor rehabilitation to buildings that have received major rehabilitation recently and buildings in need of more significant investment. In addition, the capital fund allocatio |
| The restrictions regarding where units can be built may be waived if the court determines that redevelopment in a Limited Area qualifies as a "revitalizing area." Revitalizing Orders allow the construction of some number of new family public housing unit |
| Lease compliant residents in occupancy as of 10/1/99 will have first priority in occupying new or newly rehabilitated units. The CHA will negotiate a written agreement, which will be between CHA and each resident, on relocation rights and obligations. T |
| The CHA is committed to meeting and exceeding its MBE/WBE and Section 3 goals, with particular attention to creating opportunities for qualified ROBs to gain experience that they can take to the broader marketplace. |
| 1. The CHA cannot afford to meet the demand for affordable housing in the City of Chicago. Rather, the Plan for Transformation identifies the number of units the CHA can afford to operate in a safe, decent and habitable condition over the next 20 years. |
| The original draft Admissions and Occupancy Policy (A & O) stated that families with income between 0% and 30% of Area Median Income would constitute at least 40% of admissions in any year and that families with income between 30% and 80% of Area Median I |

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| The CHA does not have higher income communities. The Plan addresses deconcentration by: the planned physical improvements to CHA properties, the concepts listed in the Section 8 waivers, the increasing of Fair Market Rents, the increasing of funds for m |
| CHA cannot reasonably expect to have sufficient funding to replace and operate each demolished unit. HUD has committed, subject to Congressional appropriations, to provide a Section 8 voucher for each demolished unit that is not replaced with a "hard" un |
| CHA supports significant participation in the redevelopment/rehabilitation planning process for residents, community partners and others. CHA committed to providing resident leadership with $1.2 million for technical assistance during the redevelopment pr |
| For planning purposes, CHA estimated the number of units that are in extreme disrepair. After a preliminary investigation, CHA reduced the estimated number of scattered sites requiring demolition to 236. CHA will hire a contractor to conduct an in-depth |
| The CHA has proposed an ambitious capital program that would rehabilitate or develop a new unit for every current resident who is, and remains, lease-compliant. |

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| RMC's who are currently managing properties will retain their status as property manager. Agreements with RMCs in training will be honored. However, RMC's must adhere to the same performance standards, contractual arrangements, and funding levels as pri |
| All bidders will be judged on the same criteria. The criteria will not include points awarded for RMC/ROB status. |
| CHA will meet its Section 3 and MBE/WBE goals. |
| RMCs which are currently managing buildings as the prime contractor with CHA will not have to submit proposals. The RMCs will retain the properties they are currently managing. However, the RMCs must sign the same contract, accept the same fees and be h |
| The residents may express their dissatisfaction with management by filing complaints with the CHA. Also, residents may express their dissatisfaction on the Resident Satisfaction Survey. |
| Two (2) CAC members or LAC representatives will be included on evaluation committees. |
| RMCs which are currently managing buildings as the prime contractor with CHA will not have to submit proposals. The RMCs will retain the properties they are currently managing. However, the RMCs must sign the same contract, accept the same fees and be h |
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| The maintenance charges will be standardized. The CAC will have some input in formulating the maintenance charges. The resident will not be charged for new refrigerators unless the damage was caused by them. All appliances will meet code requirements a |
| The piping, windows doors, and other fixtures will be fixed in a resident's apartment/unit before the CHA enforces the maintenance rule against the resident. All apartment/units will meet HQS. |

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| If an appliance, fixture or system such as toilet or boiler has not been maintained or its useful life has expired based on industry standard, then the residents will not be charged if it stops working. If it can be clearly determined that a resident is |
| The grievance procedure will be revised in the next few months and will be subject to a comment period. This concern will be considered at that time. |
| The grievance procedure will be revised in the next few months and will be subject to a comment period. This concern will be considered at that time. |
| The grievance procedure will be revised in the next few months and will be subject to a comment period. This concern will be considered at that time. |
| Emergency transfers are mandatory transfers that are implemented when a unit or building condition poses an immediate threat to resident life, health, or safety as determined either by CHA or in a legal proceeding. CHA is not required to give prior notic |
| In cases of vacancy/building consolidations, the CHA will give the residents 120 days notice. CHA will bear the cost of these transfers. To the extent possible, the CHA will allow residents in good standing to choose the development to which to transfer |
| Resident-initiated transfers are coded as transfers and placed on the appropriate waiting list, according to the date and time of transfer request. Resident-initiated transfers will not be given priority over new applicants. |
| This is a statutory issue. The CHA must follow the provisions of the Quality Housing and Work Responsibility Act. The pet policy will be addressed as part of the proposed revisions to the lease. |
| If the CHA does not make the change in rent within 15 days, the resident will not be responsible for extra time the that elapsed without the resident paying the new rent amount. |
| Each vacant apartment should be turned around within 30 days from the date its become vacant. The CHA will send tenant files to the developments that have apartments/units ready for immediate occupancy instead of holding the files at 47th Street. |

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| The CHA will reduce the vacancy rate by turning apartments/units around fast and leasing them to individuals on the various waiting lists. |
| In response, to the CAC and residents' concerns, the CHA is not closing the family waiting list at this time. |

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| The CHA and the private managers will work with the Chicago Police Department on public safety and community policing strategies. |
| CHA will fund tenant patrols at $2 million per year for the next two years. The Plan does not eliminate Tenant Patrols, but transfers responsibility of oversight of tenant patrols to the private managers and RMCs. Private managers and RMCs will create s |

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| Shorter lease terms can work in certain circumstances. Although the Section 8 Administrative Plan allows a landlord to offer a lease shorter than one year, the landlord must show that there are other tenants with a similar leases. Few Section 8 landlord |
| Language to this effect will be in the amended Administrative Plan by March, 2000. |
| Currently, 85% of Section 8 residents are under 30% of AMI. This is well within QHWRA guidelines. |
| The CHA raised the voucher payment standard to 110% of FMR as of 10/1/99. |
| Language to this effect will be in the amended Administrative Plan by March, 2000. |
| Language to this effect will be in the amended Administrative Plan by March, 2000. |
| Housing search assistance will be made available by CHAC. |
| Language to this effect will be in the amended Administrative Plan by March, 2000. |

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| The Section 8 Program is designed to give tenants choices about where they live in the private marketplace. This can lead to the need to move and compete for units in situations where landlords may be taking them off the market for condo conversions. Ho<br><br>Also, CHAC offers services for tenants who need additional information, training and support after they move in meet their obligations. To assist recipients in renting a broader range of units in most neighborhoods of the City, CHAC recently adopted a ne |
| CHA will be working, along with its contract administrator, CHAC, to improve communications about the program and the residents. When issues of discrimination and Fair Housing violations against recipients of Section 8 are identified, CHAC will provide su |
| CHA has set the payment standard for Section 8 vouchers higher than the standard "Fair Market Rent", to allow residents who are interested in moving to areas with more opportunities and/or lower concentrations of poverty and/or racial minorities to find a |

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| CHA will improve communications and revise the briefings and informational materials for new voucher holders, particularly for residents relocating from public housing. "Good neighbor workshops" and other information will be available so that people are |
| As long as the tenant remains eligible for Section 8 the voucher payments will continue. If there is a decrease in income, an interim adjustment can be made to adjust the tenant's portion of the rent downward. Income is recertified on an annual basis, whi |
| Third party verification of income is a requirement of the program. The CHA and CHAC will work to maintain confidentiality where possible. |
| CHA will make funds available for service connectors and counselors for the Section 8 program participants. CHA will work with its sister agencies at the local level to make sure that the networks of organizations that they fund are communicating and tha |
| Landlords who rent units to Section 8 participants are prohibited from charging a higher rent to Section 8 tenants than private individuals for a similar unit in the same building and neighborhood. All requests to rent an apartment are reviewed by CHAC. T |
| CHA will work to make sure that residents have access to the full array of supportive services available to Chicago residents. There is no guarantee of a job at the end, but all of the Chicago agencies that contribute to peoples' ability to achieve stead |
| CHA will make funds available for service connectors and counselors for the Section 8 program participants. CHA will work with its sister agencies at the local level to make sure that the networks of organizations that they fund are communicating and tha |
| The housing inspectors evaluate units based on HUD established Housing Quality Standards. At the time of the inspection, many tenants help the inspector by pointing out problems that they are aware of. If the problem is not covered by the Housing Quality |
| CHAC is working to expedite the time required to make inspections and make inspectors more responsive to both landlords and tenants. Inspections are generally scheduled within three (3) days of a request. Sometimes units are not ready or landlords are dif |

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| The housing inspectors evaluate units based on HUD established Housing Quality Standards. At the time of the inspection, many tenants help the inspector by pointing out problems that they are aware of. If the problem is not covered by the Housing Quality |
| HUD has initiated a new program that allows a Section 8 voucher to be used to make mortgage payments. At this time, the CHA and CHAC are developing the program which will be available in the early part of 2000. |
| Tenants with Vouchers must first agree to any increases in the rent for an apartment. CHAC reviews the rents for reasonableness prior to approving the rent increase. Where rising rents are a problem, CHAC has raised the Voucher Payment Standard. However, |
| CHA is working to improve communications about the program, including better briefings about all of the program requirements and parameters. CHAC currently conducts follow-up briefings for Section 8 recipients who are moving. It will consider the suggesti |
| The new regulations for Section 8 allow lease terms to be more or less than 12-months. CHA will maintain the 6-month lease option, although it prefers to execute longer Housing Assistance Payment contracts. |
| For hearings affecting Section 8 program participation, CHAC agrees to extend the time to request an informal hearing to 30 days from the date of notification. CHA will encourage landlords to evict problem tenants for the good of other Section 8 residents |

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| The CHA is committed to adopting a lease amendment affirming resident rights under the relocation process. The CHA is currently negotiating such an addendum with the RAB/CAC. |
| The negotiation of MOUs for specific developments is premature. A MOU should be considered part of the redevelopment process. The CHA will have a process for formulating proposals for redevelopment that includes intensive resident involvement; any MOUs |
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| The CHA Plan for Transformation lists quantifiable goals and objectives. |
| All residents will receive comparable housing during temporary relocations and a new or newly rehabilitated CHA unit if they choose CHA for permanent housing. All redevelopment plans that involve the creation of new non-elderly housing will comply with t |
| If the proposed resources are approved, the CHA will provide a rehabilitated or redeveloped unit for every lease compliant resident as of 10/1/99. The CHA estimates that approximately 1,200 families a year will relocate temporarily using Section 8 vouche |

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| CHA seeks authority to adopt reasonable rent policies that would encourage economic self-sufficiency. Such policies would only be adopted after full public comment, including input from the RAB/CAC and a formal amendment to the A & O Policy. |
| CHA has removed this request from the List of Commitments, Waivers and Requests. |
| CHA has removed this request from the List of Commitments, Waivers and Requests. |
| CHA created a document which outlines how the viability tests were conducted for each development for the CAC's use. The use of augmented viability test will allow CHA to save units from demolition which failed HUD's original test. |

# CHICAGO HOUSING AUTHORITY
# RESPONSE TO CAC COMMENTS ON THE CHA DRAFT AGENCY 1/5 YEAR PLAN
# SUBMITTED ON SEPTEMBER 30, 1999



| AFFORDABLE HOUSING CRISIS | RESPONSE |
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| According to statistics, 245,000 low-income residents of Chicago compete for only 115,000 low-cost rental units. As of September 1999, there were 28,778 people on the waiting list for public housing and 30,624 families on the waiting list for Section 8. Statistics also show that 80% of families who relocate with Section 8 vouchers end up in areas that are highly segregated racially with high levels of poverty that are not very different from the neighborhoods they came from. Meanwhile, 15,000 people are homeless in the City of Chicago. Why then is CHA calling for the demolition of 17,000 units of public housing? Further, why is CHA proposing to house families with incomes between 30% and 80% of area median income in 60% of its units? | 1. The CHA cannot afford to meet the demand for affordable housing in the City of Chicago. Rather, the Plan for Transformation identifies the number of units the CHA can afford to operate in a safe, decent and habitable condition over the next 20 years.<br><br>2. CHA is required by HUD to demolish 18,000 units of public housing to comply with Section 202 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996 (OCRA). CHA's proposed augmented viability test seeks to minimize the impact of the rule. The Plan for Transformation outlines a mechanism whereby HUD can allow CHA to redevelop or rehabilitate 5,000 units which otherwise failed the cost test.<br><br>3. The original draft Admissions and Occupancy Policy stated that families with income between 0% and 30% of Area Median Income would constitute at least **40%** of admissions in any year and that families with income between 30% and 80% of Area Median Income would constitute **60%** of admissions in any year.<br><br>The draft Admissions and Occupancy Policy has been updated to reflect that families with income between 0% and 30% of Area Median Income would constitute at least **50%** of admissions in any year and families with income between 30% and 80% of Area Median Income would constitute **50%** of admissions in any year. |
| MOU (CITY OF CHICAGO & HUD)<br><br>Why was the CAC not consulted or invited to participate when the City of Chicago, the CHA, and HUD negotiated the MOU which granted the CHA “Moving to Work” status? | RESPONSE<br><br>The CHA was not a party to the MOU. |

# CHICAGO HOUSING AUTHORITY
# RESPONSE TO CAC COMMENTS ON THE CHA DRAFT AGENCY 1/5 YEAR PLAN
# SUBMITTED ON SEPTEMBER 30, 1999



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| "MOVING TO WORK" (MTW) DEMONSTRATION PROGRAM<br><br>If CHA's PHMAP score is 69.96, why is it applying to be a MTW that requires a score of 80? Also, why should CHA receive MTW status if they failed to submit an application through the formal process? CHA failed to notify residents. CHA does not explain how it will serve the same number of low-income families. | RESPONSE<br><br>HUD granted the City permission to submit a MTW application as part of the return to local control. CHA's plan allows for a hard unit for every lease-compliant resident. In addition, residents have the option to take a Section 8 Certificate. |
| WAIVERS AND REQUESTS<br><br>If the CHA cannot meet the requirements for a MTW, then why should CHA be allowed to waive requirements of the U.S. Housing Act? Of those waivers that do not require MTW status and can be granted under HUD's general waiver authority, why has the CAC not been given sufficient information to permit the CAC to respond?<br><br>According to the MOU, the CHA agreed to discuss the substance of each waiver requested with the CAC. Phillip Jackson's letter date 8/30/99 stated that the CHA was only requesting five waivers. The CAC was not notified of the complete list of 38 waivers until 9/27/99. Why did CHA violate the federal law by failing to include the CAC in the planning process of the formulation of the waivers? | RESPONSE<br><br>The CHA staff met with the subcommittees and the full RAB/CAC 15 times to review all aspects of the draft Plan prior to its release in September of 1999. The RAB/CAC provided CHA with extensive and detailed comments and recommendations during the public comment period.<br><br>The CHA met with the RAB/CAC both during and after the comment period ended to further amend the Plan based on resident feedback. Lengthy negotiating sessions on topics such as Resident Management Corporations, Section 3, private management contracts and relocation and redevelopment activities took place throughout the months of November and December. |
| PUBLIC NOTICE REQUIREMENT<br><br>Why did the CHA fail to provide the requisite 45-day notice for its public hearings? | RESPONSE<br><br>CHA did provide the requisite 45-day notice for its public hearings. CHA included a notice to all residents in the October rent statement, mailed September 29, on the public meeting, which was held on November 16, 1999. |
| BLOCK GRANT FUNDING<br><br>The CHA has proposed to merge the four main subsidy programs—operating, capital, drug elimination, and Section 8—into one funding stream. Why won't the CHA be more specific regarding the percentages of the merged funds will be allocated to each? Which will receive more and which will be cut and by how much? | RESPONSE<br><br>The revised Plan for Transformation includes a Five-Year Section 8 Sources and Uses Budget, as well as a Five-Year Public Housing Sources and Uses Budget. |

# CHICAGO HOUSING AUTHORITY
# RESPONSE TO CAC COMMENTS ON THE CHA DRAFT AGENCY 1/5 YEAR PLAN
# SUBMITTED ON SEPTEMBER 30, 1999



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| DEMOLITION COSTS AND STREAMLINING<br><br>Why is the CHA requesting a waiver of submitting HUD demolition applications? Although under the MTW program this is not waivable, if granted how will the rights granted to the residents under Section 18 of the U.S. Housing Act of 1937 be protected? | RESPONSE<br><br>CHA is not requesting a waiver for the submission of demolition applications. Rather, CHA is requesting streamlined process for demolition applications. In order to successfully arrange mixed finance deals; CHA cannot afford extended HUD processing times. In addition, the CHA will ask HUD to pay for the demolition in order to maximize the number of units CHA can create with its capital funds as part of the List of Commitments, Waivers and Requests. |
| MIXED-FINANCE REQUIREMENTS WAIVER<br><br>Why is the waiver regarding mixed-finance requirements not specific? How will the requirements hinder the CHA's redevelopment plans that require the CHA to ask for a waiver? | RESPONSE<br><br>CHA removed this request from the List of Commitments, Waivers and Requests. |
| TOTAL DEVELOPMENT COSTS WAIVER<br><br>Why is CHA asking for an unlimited waiver of Total Development Costs that would limit the number of replacement public housing units that could be built as opposed to requesting that the ceiling be raised? | RESPONSE<br><br>CHA removed this request from the List of Commitments, Waivers and Requests. |
| STREAMLINED DEMOLITION/DISPOSITION PROCESSING<br><br>Why doesn't the CHA provide details in the list of waivers as what a streamlined processing agreement would look like? | RESPONSE<br><br>CHA will request that HUD limit processing time. |
| CDBG FUNDS USE WAIVER<br><br>Why is the CHA proposing to use CDBG funds for new construction of mixed-finance public housing transactions not built by CDBG organizations? | RESPONSE<br><br>CHA removed this request from the List of Commitments, Waivers and Requests. |

| AUGMENTATION OF SEC. 202 VIABILITY TEST WITH MARKET VIABILITY PROGRAM | RESPONSE |
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| Why did CHA state in 1998 when they submitted its strategic plans for 17 developments that the plans passed the Section 202 viability test and now contend that none of the plans passed the viability test and, in addition more have failed? Where is the CHA's justification and data that supports the conclusion that the plans failed?<br><br>What justification does CHA have for the results of the Section 202 viability analysis?<br><br>If the CHA can prove conclusively that the designated developments have failed the viability test, will CHA agree to the conditions set forth:<br>1. The LAC will participate in a working group that designs the development proposal and RFP and selects the private developer;<br>2. CHA will lease the land to the LAC or a resident development corporation for 99 years;<br>3. The LAC or a subsidiary resident development corporation will be a co-general partner with the private developer of all the units and immediate community;<br>4. Technical assistance will be provided in the amount of no less than $ 200,000 per development so that the LAC may contract its own architects, engineers, development consultants, and lawyers to advise it regarding the design and implementation of the redevelopment plan;<br>5. No less than 40% of the units constructed back on site will be public housing targeted for families earning less than 30% of area median income;<br>6. All families displaced at least as far back as January 1999 will have the right to return to one of the newly constructed or rehabilitate public housing units as long as the family has been lease compliant;<br>7. No income floors will be established for Section 8 voucher families for non-public housing units;<br>8. Before families can be moved out of housing targeted for demolition or rehabilitation, new housing will be constructed or rehabilitated into | See the viability booklet prepared for the CAC on November 8, 1999.<br><br>1. The CHA supports resident involvement in the redevelopment process, including the drafting of the RFP or RFQ and participation on the selection committee. See the chart in the Plan for Transformation.<br>2. At this time, CHA does not contemplate leasing land to the LAC.<br>3. At this time, CHA does not contemplate permitting the LAC to be a general partner with private developers on CHA land.<br>4. CHA commits $1.2 million for resident technical assistance during the redevelopment process. Several foundations have expressed interest in augmenting the financial resources for this process.<br>5. CHA strives to get the maximum number of hard units. The percentage by development may vary.<br>6. CHA agrees with a date of October 1.<br>7. The CHA is considering this issue.<br>8. CHA cannot guarantee immediate new housing for relocating families. CHA estimates that less than 6,000 families may need to be relocated to Section 8 housing. However, all lease-compliant families will have the right to return to a public housing unit within a reasonable period of time once new units are available.<br>9. CHA is committed to adopting a lease amendment affirming the rights of residents under the relocation process. CHA is currently negotiating such an addendum with the RAB/CAC. |

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| which the displaced families can move in accordance with a phasing program;<br>9. A relocation contract will be executed between the CHA and every family residing in the development? | |

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| NON-202 FAMILY PROPERTIES<br><br>Will CHA adhere to the same criteria mentioned above regarding LAC's from developments that do not contain Section 202 buildings? | RESPONSE<br><br>For the non-scattered site family properties, yes. |
| LEASE AND GRIEVANCE<br><br>Why is the CHA seeking a waiver from federal law regarding evictions for only good cause and requesting that CHA be subject to only state and local eviction laws?<br><br>Why is the CHA seeking a waiver from federal law that sets forth a grievance procedure enabling public housing residents to challenge (outside a courtroom) any CHA action, or failure to act, that adversely affects their rights, duties, welfare or status? | RESPONSE<br><br>CHA is seeking a waiver regarding lease and grievance rules in order to encourage better community standards, subject to state and local law.<br><br>Any changes to the lease and grievance rules will undergo a full public comment period. |
| RENT REFORM WAIVER<br><br>What sorts of policies is CHA going to reform regarding rent? | RESPONSE<br><br>CHA is asking for the authority to establish reasonable rent policies. CHA will go through a public process prior to instituting such policies. This is consistent with other MTW agencies. |
| DESIGNATED HOUSING<br><br>Will CHA's request for a waiver that will enable all 56 Senior buildings to be designated senior only displace any residents with disabilities or reduce the number of units available to applicants with disabilities on the waiting list? | RESPONSE<br><br>Residents with disabilities will not be displaced. Young persons with disabilities will have the opportunity to choose to stay or transfer to a new or rehabilitated accessible unit within the family developments. Under the plan, at least 5% of all rehabilitated and new units (743 family units) will be made fully accessible. This is a significant increase in the current number of accessible family units. Seniors with disabilities will remain in senior buildings. |

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| SITE-BASED WAITING LISTS<br><br>What is CHA going to do regarding the criteria it must meet according to HUD rules before it will be granted site-based waiting lists? How will CHA ensure that the legal criteria for having site-based waiting lists will be met? | RESPONSE<br><br>CHA fully intends to meet all requirements surrounding site-based waiting list, including court orders and settlements. The Plan is a conceptual document. Adopting a site-based waiting list will be subject to the public process. |
| HOUSING ASSISTANCE TIED TO SELF-SUFFICIENCY<br><br>Why does CHA not provide any detail regarding how it will tie housing assistance or residency with self-sufficiency? How will deal with the issue of the community service requirement and will it still require those individuals to have economic self-sufficiency requirements too? | RESPONSE<br><br>The request which tied housing assistance to self sufficiency was removed. CHA will revise the lease to incorporate the CSR requirements. CHA will work with the CAC in a lease revision working group to develop an approach to implementing the CSR. This will happen prior to the lease being made available for public comment. |
| DE-CONCENTRATION<br><br>Deconcentration is a two-way street. How is CHA proposing to implement income-mixing in both lower and higher income communities. | RESPONSE<br><br>The CHA does not have higher income communities. (Hard data forthcoming).<br>The Plan addresses deconcentration by:<br>The planned physical improvements to CHA properties.<br>The concepts listed in the Section 8 waivers<br>Increasing Fair Market Rents<br>Increasing funds for mobility counseling<br>Creating mixed income developments through its redevelopment activities. |
| NEGOTIATED CONTRACTS<br><br>What is a “negotiated contract” and what services does it cover? Why is CHA requesting a waiver on the prohibition of these contracts? | RESPONSE<br><br>This wavier request asks HUD to allow CHA to negotiate price for all contracts for services. Currently, CHA can only negotiate the price on A & E services contracts. Prohibiting negotiated contracts is contrary to standard business practices common to municipal governments. |

| SUITABILITY FOR SECTION 8 TENANCY | RESPONSE |
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| Why is CHA seeking a waiver of the admissions criteria for Section 8 to permit the CHA to screen for suitability for residency without identifying the specific admissions criteria it wants waived? | CHA wants identical screening criteria for public housing and section 8 tenants. Such criteria will be developed and subject to public comment. However, the criteria will be similar to the criteria listed in CHA's draft A & O Policy. |
| FAMILY SELF-SUFFICIENCY | RESPONSE |
| If CHA wants to replace the Family Self-Sufficiency Program with a locally determined program, then what will it look like, what policies and procedures will it have, including whether participation would be required of all adult residents? | CHA has removed this request from the List of Commitments, Waivers and Requests. |
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| RESIDENT MANAGEMENT CORPORATIONS | RESPONSE |
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| Will Resident Management Corporations (RMCs) be given the opportunity to continue to manage their properties? Will they be given opportunity to manage other developments?<br><br>Will CHA consider the following recommendations:<br>1. Follow the requirements of Section 3;<br>2. Award not less than 20% of private management contracts to RMCs and Resident Owned Businesses (ROBs);<br>3. As part of the evaluation process of the RFP for management services, include language indicating CHA will award between 15-25 points to RMCs or ROBs for those that currently manage developments and submit proposals;<br>4. Inform all potential private managers in the RFP that if selected, all private managers must comply with Section 3 in hiring and contracting;<br>5. Encourage MBE and WBE management of CHA properties;<br>6. Indicate in the RFP that all selected contractors (private firms, RMCs, and ROBs) that they shall comply with applicable provisions of the Memorandum of Accord between the CAC and CHA and the 1999 Funding Agreement between the CAC and the CHA? | RMCs which are currently managing buildings as the prime contractor with CHA will not have to submit proposals. These RMCs will retain the properties they are currently managing. However, the RMCs will be held to the same contract, accept the same fees and be held to the same standards as all other professional property management firms.<br><br>1. CHA will follow Section 3 requirements.<br>2. The CHA intends to award the contracts to the most responsive bidders who can provide quality management, and maintain the properties to the standard used by professional property managers nationwide. The CHA will not set aside properties for RMCs or ROBs. The CHA will consider all responsive bids to the RFP, including those submitted by existing RMCs or Alternative Programs.<br>3. RMCs which are currently managing buildings as the prime contractor with CHA will not have to submit proposals. The RMCs will retain the properties they are currently managing.<br>4. CHA does this now.<br>5. CHA does this now.<br>*6.* The Management Plan requires property managers and RMCs to consult with the LAC to on the preparation of the Operating Budget and the Capital Plan for the property. |
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| Will the CHA plan ensure that over the next ten years:<br>1. Award 20% of all contracts to ROBs and Section 3 eligible businesses;<br>2. Award individual contracts to CHA ROBs up to $ 1 million pursuant to 24 CFR Part 963; and<br>3. Ensure that 40% of all contracts are awarded to minority and women owned businesses within the Chicago city limits? | CHA will comply with all MBE/WBE and Section 3 requirements. |

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| Since Chicago has an unusually high number of very low-income families, why isn't the income targeting ceiling reduced so that at least 75% of families receiving Section 8 vouchers in any fiscal year must earn or receive 20% as opposed to 30% or less of the area median income? | Approximately 85% of CHA's current Section 8 residents have incomes at or below 30% of the area median income. The CHA does not consider it necessary to address the issue of establishing a floor at this time. |
| SECTION 8 PAYMENT STANDARDS | RESPONSE |
| Will CHA support raising the Fair Market Rent (FMR) to 110% from 100% so that families can find housing before their vouchers expire? | Yes, by raising FMR's for mobility moves and deconcentration |
| SECTION 8 INITIAL LEASE TERMS | RESPONSE |
| Why does CHA approve shorter initial term leases (less than one year) even though current law allows an owner to terminate the lease agreement without good cause by serving the tenant with just 30 days notice? | Current legislation does not require a one-year lease. CHA supports this legislation as it broadens the Section 8 market for our residents. In practice, it is CHAC's current practice requires landlords and tenants to sign a one-year lease unless the landlord can show historical use of a 6-month lease. |
| VIOLENT OR DRUG-RELATED CRIMINAL ACTIVITY IN THE SECTION 8 PROGRAM | RESPONSE |
| Will the CHA consider equitable circumstances when deciding whether to evict a household? Will the CHA preserve the CHAC policy that considers all the circumstances of a case before terminating a participant's right to rental assistance? | CHA does not evict Section 8 tenants, the landlord does. CHA can terminate assistance for various reasons. In accordance with the Section 8 Administrative Plan, residents are entitled to an informal hearing if assistance is terminated. |
| GRIEVANCE PROCEDURES IN THE SECTION 8 PROGRAM | RESPONSE |
| Will the CHA extend the time for requesting a grievance hearing to contest any proposed adverse action to thirty days after the voucher-holder received notice of CHAC's intention to take action? | CHA and CHAC both agree that extending the time to 30 days is reasonable. |

| RELOCATION | RESPONSE |
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| Will CHA execute with each resident subject to relocation a CHA Leaseholder Housing Choice and Relocation Rights Contract? | CHA is committed to adopting a lease amendment affirming resident rights under the relocation process. The Agency is currently negotiating such an addendum with the RAB/CAC. |
| Will CHA make good faith efforts to negotiate a memorandum of understanding with the LAC regarding any proposed demolition, rehabilitation, consolidation, or conversion to tenant-based assistance for the LAC's development? If so, will CHA consider including the following in the MOU:<br>1. All units and common areas in buildings used for relocation must be in decent, safe and habitable condition and must be free of code violations;<br>2. All units in the relocation buildings must be free of all environmental hazards;<br>3. All unit in the relocation buildings must be maintained in decent, safe and habitable condition;<br>4. All relocation buildings must be kept at full occupancy;<br>5. All relocation buildings must have 24-hour security;<br>6. The LAC shall continue to represent families moved outside the development into Section 8 voucher housing; and<br>7. Before families can be moved out of housing targeted for demolition, consolidation, or conversion, new housing must be constructed or rehabilitated into which the displaced families can move. This shall be accomplished through a program of phased demolition, conversion or consolidation and concurrent rehabilitation and/or construction of new units? | Since the LAC will be involved in the redevelopment process in each development, CHA finds it unnecessary to enter into a MOU for each redevelopment action.<br><br>1-4. CHA finds each request reasonable.<br>5. CHA recognizes the need to maintain a high standard of maintenance and security for relocation buildings and will provide it. CHA will create an effective an appropriate security plan for each building that may or may not include 24-hour security.<br>6. The LAC can continue to represent families once they move to Section 8 housing for temporary moves only.<br>7. CHA cannot guarantee that a sufficient number of hard units will be built prior to relocating families. |

# CHICAGO HOUSING AUTHORITY
# RESPONSE TO CAC COMMENTS ON THE CHA DRAFT AGENCY 1/5 YEAR PLAN
# SUBMITTED ON SEPTEMBER 30, 1999



| AFFORDABLE HOUSING CRISIS | RESPONSE |
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| According to statistics, 245,000 low-income residents of Chicago compete for only 115,000 low-cost rental units. As of September 1999, there were 28,778 people on the waiting list for public housing and 30,624 families on the waiting list for Section 8. Statistics also show that 80% of families who relocate with Section 8 vouchers end up in areas that are highly segregated racially with high levels of poverty that are not very different from the neighborhoods they came from. Meanwhile, 15,000 people are homeless in the City of Chicago. Why then is CHA calling for the demolition of 17,000 units of public housing? Further, why is CHA proposing to house families with incomes between 30% and 80% of area median income in 60% of its units? | 1. The CHA cannot afford to meet the demand for affordable housing in the City of Chicago. Rather, the Plan for Transformation identifies the number of units the CHA can afford to operate in a safe, decent and habitable condition over the next 20 years.<br><br>2. CHA is required by HUD to demolish 18,000 units of public housing to comply with Section 202 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996 (OCRA). CHA's proposed augmented viability test seeks to minimize the impact of the rule. The Plan for Transformation outlines a mechanism whereby HUD can allow CHA to redevelop or rehabilitate 5,000 units which otherwise failed the cost test.<br><br>3. The original draft Admissions and Occupancy Policy stated that families with income between 0% and 30% of Area Median Income would constitute at least **40%** of admissions in any year and that families with income between 30% and 80% of Area Median Income would constitute **60%** of admissions in any year.<br><br>The draft Admissions and Occupancy Policy has been updated to reflect that families with income between 0% and 30% of Area Median Income would constitute at least **50%** of admissions in any year and families with income between 30% and 80% of Area Median Income would constitute **50%** of admissions in any year. |
| MOU (CITY OF CHICAGO & HUD)<br><br>Why was the CAC not consulted or invited to participate when the City of Chicago, the CHA, and HUD negotiated the MOU which granted the CHA “Moving to Work” status? | RESPONSE<br><br>The CHA was not a party to the MOU. |

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# RESPONSE TO CAC COMMENTS ON THE CHA DRAFT AGENCY 1/5 YEAR PLAN
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| "MOVING TO WORK" (MTW) DEMONSTRATION PROGRAM<br><br>If CHA's PHMAP score is 69.96, why is it applying to be a MTW that requires a score of 80? Also, why should CHA receive MTW status if they failed to submit an application through the formal process? CHA failed to notify residents. CHA does not explain how it will serve the same number of low-income families. | RESPONSE<br><br>HUD granted the City permission to submit a MTW application as part of the return to local control. CHA's plan allows for a hard unit for every lease-compliant resident. In addition, residents have the option to take a Section 8 Certificate. |
| WAIVERS AND REQUESTS<br><br>If the CHA cannot meet the requirements for a MTW, then why should CHA be allowed to waive requirements of the U.S. Housing Act? Of those waivers that do not require MTW status and can be granted under HUD's general waiver authority, why has the CAC not been given sufficient information to permit the CAC to respond?<br><br>According to the MOU, the CHA agreed to discuss the substance of each waiver requested with the CAC. Phillip Jackson's letter date 8/30/99 stated that the CHA was only requesting five waivers. The CAC was not notified of the complete list of 38 waivers until 9/27/99. Why did CHA violate the federal law by failing to include the CAC in the planning process of the formulation of the waivers? | RESPONSE<br><br>The CHA staff met with the subcommittees and the full RAB/CAC 15 times to review all aspects of the draft Plan prior to its release in September of 1999. The RAB/CAC provided CHA with extensive and detailed comments and recommendations during the public comment period.<br><br>The CHA met with the RAB/CAC both during and after the comment period ended to further amend the Plan based on resident feedback. Lengthy negotiating sessions on topics such as Resident Management Corporations, Section 3, private management contracts and relocation and redevelopment activities took place throughout the months of November and December. |
| PUBLIC NOTICE REQUIREMENT<br><br>Why did the CHA fail to provide the requisite 45-day notice for its public hearings? | RESPONSE<br><br>CHA did provide the requisite 45-day notice for its public hearings. CHA included a notice to all residents in the October rent statement, mailed September 29, on the public meeting, which was held on November 16, 1999. |
| BLOCK GRANT FUNDING<br><br>The CHA has proposed to merge the four main subsidy programs—operating, capital, drug elimination, and Section 8—into one funding stream. Why won't the CHA be more specific regarding the percentages of the merged funds will be allocated to each? Which will receive more and which will be cut and by how much? | RESPONSE<br><br>The revised Plan for Transformation includes a Five-Year Section 8 Sources and Uses Budget, as well as a Five-Year Public Housing Sources and Uses Budget. |

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| DEMOLITION COSTS AND STREAMLINING<br><br>Why is the CHA requesting a waiver of submitting HUD demolition applications? Although under the MTW program this is not waivable, if granted how will the rights granted to the residents under Section 18 of the U.S. Housing Act of 1937 be protected? | RESPONSE<br><br>CHA is not requesting a waiver for the submission of demolition applications. Rather, CHA is requesting streamlined process for demolition applications. In order to successfully arrange mixed finance deals; CHA cannot afford extended HUD processing times. In addition, the CHA will ask HUD to pay for the demolition in order to maximize the number of units CHA can create with its capital funds as part of the List of Commitments, Waivers and Requests. |
| MIXED-FINANCE REQUIREMENTS WAIVER<br><br>Why is the waiver regarding mixed-finance requirements not specific? How will the requirements hinder the CHA's redevelopment plans that require the CHA to ask for a waiver? | RESPONSE<br><br>CHA removed this request from the List of Commitments, Waivers and Requests. |
| TOTAL DEVELOPMENT COSTS WAIVER<br><br>Why is CHA asking for an unlimited waiver of Total Development Costs that would limit the number of replacement public housing units that could be built as opposed to requesting that the ceiling be raised? | RESPONSE<br><br>CHA removed this request from the List of Commitments, Waivers and Requests. |
| STREAMLINED DEMOLITION/DISPOSITION PROCESSING<br><br>Why doesn't the CHA provide details in the list of waivers as what a streamlined processing agreement would look like? | RESPONSE<br><br>CHA will request that HUD limit processing time. |
| CDBG FUNDS USE WAIVER<br><br>Why is the CHA proposing to use CDBG funds for new construction of mixed-finance public housing transactions not built by CDBG organizations? | RESPONSE<br><br>CHA removed this request from the List of Commitments, Waivers and Requests. |

| AUGMENTATION OF SEC. 202 VIABILITY TEST WITH MARKET VIABILITY PROGRAM | RESPONSE |
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| Why did CHA state in 1998 when they submitted its strategic plans for 17 developments that the plans passed the Section 202 viability test and now contend that none of the plans passed the viability test and, in addition more have failed? Where is the CHA's justification and data that supports the conclusion that the plans failed?<br><br>What justification does CHA have for the results of the Section 202 viability analysis?<br><br>If the CHA can prove conclusively that the designated developments have failed the viability test, will CHA agree to the conditions set forth:<br>1. The LAC will participate in a working group that designs the development proposal and RFP and selects the private developer;<br>2. CHA will lease the land to the LAC or a resident development corporation for 99 years;<br>3. The LAC or a subsidiary resident development corporation will be a co-general partner with the private developer of all the units and immediate community;<br>4. Technical assistance will be provided in the amount of no less than $ 200,000 per development so that the LAC may contract its own architects, engineers, development consultants, and lawyers to advise it regarding the design and implementation of the redevelopment plan;<br>5. No less than 40% of the units constructed back on site will be public housing targeted for families earning less than 30% of area median income;<br>6. All families displaced at least as far back as January 1999 will have the right to return to one of the newly constructed or rehabilitate public housing units as long as the family has been lease compliant;<br>7. No income floors will be established for Section 8 voucher families for non-public housing units;<br>8. Before families can be moved out of housing targeted for demolition or rehabilitation, new housing will be constructed or rehabilitated into | See the viability booklet prepared for the CAC on November 8, 1999.<br><br>1. The CHA supports resident involvement in the redevelopment process, including the drafting of the RFP or RFQ and participation on the selection committee. See the chart in the Plan for Transformation.<br>2. At this time, CHA does not contemplate leasing land to the LAC.<br>3. At this time, CHA does not contemplate permitting the LAC to be a general partner with private developers on CHA land.<br>4. CHA commits $1.2 million for resident technical assistance during the redevelopment process. Several foundations have expressed interest in augmenting the financial resources for this process.<br>5. CHA strives to get the maximum number of hard units. The percentage by development may vary.<br>6. CHA agrees with a date of October 1.<br>7. The CHA is considering this issue.<br>8. CHA cannot guarantee immediate new housing for relocating families. CHA estimates that less than 6,000 families may need to be relocated to Section 8 housing. However, all lease-compliant families will have the right to return to a public housing unit within a reasonable period of time once new units are available.<br>9. CHA is committed to adopting a lease amendment affirming the rights of residents under the relocation process. CHA is currently negotiating such an addendum with the RAB/CAC. |

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| which the displaced families can move in accordance with a phasing program;<br>9. A relocation contract will be executed between the CHA and every family residing in the development? | |

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| NON-202 FAMILY PROPERTIES<br><br>Will CHA adhere to the same criteria mentioned above regarding LAC's from developments that do not contain Section 202 buildings? | RESPONSE<br><br>For the non-scattered site family properties, yes. |
| LEASE AND GRIEVANCE<br><br>Why is the CHA seeking a waiver from federal law regarding evictions for only good cause and requesting that CHA be subject to only state and local eviction laws?<br><br>Why is the CHA seeking a waiver from federal law that sets forth a grievance procedure enabling public housing residents to challenge (outside a courtroom) any CHA action, or failure to act, that adversely affects their rights, duties, welfare or status? | RESPONSE<br><br>CHA is seeking a waiver regarding lease and grievance rules in order to encourage better community standards, subject to state and local law.<br><br>Any changes to the lease and grievance rules will undergo a full public comment period. |
| RENT REFORM WAIVER<br><br>What sorts of policies is CHA going to reform regarding rent? | RESPONSE<br><br>CHA is asking for the authority to establish reasonable rent policies. CHA will go through a public process prior to instituting such policies. This is consistent with other MTW agencies. |
| DESIGNATED HOUSING<br><br>Will CHA's request for a waiver that will enable all 56 Senior buildings to be designated senior only displace any residents with disabilities or reduce the number of units available to applicants with disabilities on the waiting list? | RESPONSE<br><br>Residents with disabilities will not be displaced. Young persons with disabilities will have the opportunity to choose to stay or transfer to a new or rehabilitated accessible unit within the family developments. Under the plan, at least 5% of all rehabilitated and new units (743 family units) will be made fully accessible. This is a significant increase in the current number of accessible family units. Seniors with disabilities will remain in senior buildings. |

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| SITE-BASED WAITING LISTS<br><br>What is CHA going to do regarding the criteria it must meet according to HUD rules before it will be granted site-based waiting lists? How will CHA ensure that the legal criteria for having site-based waiting lists will be met? | RESPONSE<br><br>CHA fully intends to meet all requirements surrounding site-based waiting list, including court orders and settlements. The Plan is a conceptual document. Adopting a site-based waiting list will be subject to the public process. |
| HOUSING ASSISTANCE TIED TO SELF-SUFFICIENCY<br><br>Why does CHA not provide any detail regarding how it will tie housing assistance or residency with self-sufficiency? How will deal with the issue of the community service requirement and will it still require those individuals to have economic self-sufficiency requirements too? | RESPONSE<br><br>The request which tied housing assistance to self sufficiency was removed. CHA will revise the lease to incorporate the CSR requirements. CHA will work with the CAC in a lease revision working group to develop an approach to implementing the CSR. This will happen prior to the lease being made available for public comment. |
| DE-CONCENTRATION<br><br>Deconcentration is a two-way street. How is CHA proposing to implement income-mixing in both lower and higher income communities. | RESPONSE<br><br>The CHA does not have higher income communities. (Hard data forthcoming).<br>The Plan addresses deconcentration by:<br>The planned physical improvements to CHA properties.<br>The concepts listed in the Section 8 waivers<br>Increasing Fair Market Rents<br>Increasing funds for mobility counseling<br>Creating mixed income developments through its redevelopment activities. |
| NEGOTIATED CONTRACTS<br><br>What is a “negotiated contract” and what services does it cover? Why is CHA requesting a waiver on the prohibition of these contracts? | RESPONSE<br><br>This wavier request asks HUD to allow CHA to negotiate price for all contracts for services. Currently, CHA can only negotiate the price on A & E services contracts. Prohibiting negotiated contracts is contrary to standard business practices common to municipal governments. |

| SUITABILITY FOR SECTION 8 TENANCY | RESPONSE |
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| Why is CHA seeking a waiver of the admissions criteria for Section 8 to permit the CHA to screen for suitability for residency without identifying the specific admissions criteria it wants waived? | CHA wants identical screening criteria for public housing and section 8 tenants. Such criteria will be developed and subject to public comment. However, the criteria will be similar to the criteria listed in CHA's draft A & O Policy. |
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| Since Chicago has an unusually high number of very low-income families, why isn't the income targeting ceiling reduced so that at least 75% of families receiving Section 8 vouchers in any fiscal year must earn or receive 20% as opposed to 30% or less of the area median income? | Approximately 85% of CHA's current Section 8 residents have incomes at or below 30% of the area median income. The CHA does not consider it necessary to address the issue of establishing a floor at this time. |
| SECTION 8 PAYMENT STANDARDS | RESPONSE |
| Will CHA support raising the Fair Market Rent (FMR) to 110% from 100% so that families can find housing before their vouchers expire? | Yes, by raising FMR's for mobility moves and deconcentration |
| SECTION 8 INITIAL LEASE TERMS | RESPONSE |
| Why does CHA approve shorter initial term leases (less than one year) even though current law allows an owner to terminate the lease agreement without good cause by serving the tenant with just 30 days notice? | Current legislation does not require a one-year lease. CHA supports this legislation as it broadens the Section 8 market for our residents. In practice, it is CHAC's current practice requires landlords and tenants to sign a one-year lease unless the landlord can show historical use of a 6-month lease. |
| VIOLENT OR DRUG-RELATED CRIMINAL ACTIVITY IN THE SECTION 8 PROGRAM | RESPONSE |
| Will the CHA consider equitable circumstances when deciding whether to evict a household? Will the CHA preserve the CHAC policy that considers all the circumstances of a case before terminating a participant's right to rental assistance? | CHA does not evict Section 8 tenants, the landlord does. CHA can terminate assistance for various reasons. In accordance with the Section 8 Administrative Plan, residents are entitled to an informal hearing if assistance is terminated. |
| GRIEVANCE PROCEDURES IN THE SECTION 8 PROGRAM | RESPONSE |
| Will the CHA extend the time for requesting a grievance hearing to contest any proposed adverse action to thirty days after the voucher-holder received notice of CHAC's intention to take action? | CHA and CHAC both agree that extending the time to 30 days is reasonable. |

| RELOCATION | RESPONSE |
|---|---|
| Will CHA execute with each resident subject to relocation a CHA Leaseholder Housing Choice and Relocation Rights Contract? | CHA is committed to adopting a lease amendment affirming resident rights under the relocation process. The Agency is currently negotiating such an addendum with the RAB/CAC. |
| Will CHA make good faith efforts to negotiate a memorandum of understanding with the LAC regarding any proposed demolition, rehabilitation, consolidation, or conversion to tenant-based assistance for the LAC's development? If so, will CHA consider including the following in the MOU:<br>1. All units and common areas in buildings used for relocation must be in decent, safe and habitable condition and must be free of code violations;<br>2. All units in the relocation buildings must be free of all environmental hazards;<br>3. All unit in the relocation buildings must be maintained in decent, safe and habitable condition;<br>4. All relocation buildings must be kept at full occupancy;<br>5. All relocation buildings must have 24-hour security;<br>6. The LAC shall continue to represent families moved outside the development into Section 8 voucher housing; and<br>7. Before families can be moved out of housing targeted for demolition, consolidation, or conversion, new housing must be constructed or rehabilitated into which the displaced families can move. This shall be accomplished through a program of phased demolition, conversion or consolidation and concurrent rehabilitation and/or construction of new units? | Since the LAC will be involved in the redevelopment process in each development, CHA finds it unnecessary to enter into a MOU for each redevelopment action.<br><br>1-4. CHA finds each request reasonable.<br>5. CHA recognizes the need to maintain a high standard of maintenance and security for relocation buildings and will provide it. CHA will create an effective an appropriate security plan for each building that may or may not include 24-hour security.<br>6. The LAC can continue to represent families once they move to Section 8 housing for temporary moves only.<br>7. CHA cannot guarantee that a sufficient number of hard units will be built prior to relocating families. |

## Civil Rights Certification

See PHA Plan Certifications.  Fair Housing Language included in this document.

## Description of Organizational Structure

The organization of the CHA will be divided into the Executive Office and four functional areas: Operations, Development Management, Finance and Administration, and Resident Programs.

- **Operations**. Responsible for the management and repair of all agency-owned or agency-subsidized properties.

- **Development Management**. Responsible for planning and implementing property improvement plans that involve private development partners.

- **Finance and Administration**. Provides budget, accounting, personnel, management information, and general administrative services.

- **Resident Programs**. Provides support and assistance in helping residents link to services. Also acts as liaison with various social, educational, and employment-related agencies.

- **Section 8**. Responsible for overseeing the Section 8 Rental Assistance Program.

**CHICAGO HOUSING AUTHORITY**
**VARIOUS OTHER GRANT PROGRAMS**
**FY2000**

| | |
|---|---|
| **COMMUNITY DEVELOPMENT BLOCK GRANTS** | |
| CDBG | $38,220 |
| Altgeld Youth Development Initiatives | 40,000 |
| CHA Ambassador | 8,000 |
| **TOTAL CDBG** | **86,220** |
| | |
| **OTHER FEDERAL GRANTS** | |
| **Department of Housing & Urban Development** | |
| Elderly Services Coordinator Program | 600,000 |
| **US Department of Agriculture through Illinois State Board of Education** | |
| Summerfood | 3,733,199 |
| **TOTAL OTHER FEDERAL GRANTS** | **4,333,199** |
| | |
| **NON- FEDERAL SOURCES** | |
| **Department of Health** | |
| Child Health Intervention Grant | 70,000 |
| CHIP | 47,000 |
| **Office of Attorney General** | |
| Victim Assistance Grant | 24,205 |
| Sr. Victim Witness Program | 23,550 |
| **Illinois Department of Human Services** | |
| Teen Parent Initiative | 29,000 |
| TeenReach | 13,680 |
| **Chicago Department of Human Services** | |
| Child Care, CDHS | 1,753,060 |
| Head Start CDHS | 971,461 |
| Collaboration, CDHS | 109,000 |
| Head Start/Child Care CDHS | 177,693 |
| Community TransNet | 200,000 |
| **Other Grants** | |
| RTA Job Access | 200,000 |
| MET Quantum | 86,176 |
| **TOTAL NON-FEDERAL GRANTS** | **3,704,825** |
| | |
| Employee Benefits | 736,137 |
| | |
| **GRAND TOTAL** | **$8,860,381** |

**CHICAGO HOUSING AUTHORITY**
**HUD OFFICE OF THE INSPECTOR GENERAL AUDIT**

**History:**

The HUD Inspector General's Office audited the Chicago Housing Authority in FY 1996 and issued 55 findings/recommendations. In 1998, the HUD IG Office performed a follow-up audit to review the Agency's progress in completing the findings/recommendations. Out of the 55 findings, all but 17 have been completed. In accordance with CHA's letter to Ms. Debra Torres, Director, Office of Public Housing, State of Illinois, dated August 6, 1999, CHA identified which HUD IG findings/recommendations are no longer be applicable, as the findings conflict with the CHA's Plan for Transformation. Only open 11 findings remain applicable. The following attachment outlines the recommendations, the status of each and where appropriate, new completion dates.

## NO LONGER APPLICABLE

| Recommendations | Agreed HUD IG Completion Date | Status | CHA Proposed Target Date |
|---|---|---|---|
| **02A** | | | |
| **Perform a marketing study and based on the results develop a marketing plan as required by HUD.** | 12/31/99 | Not Applicable at this time - The Authority will develop a site specific marketing plan after the CHA Agency Plan has been implemented and the community properties have been revitalized. | |
| **02B** | | | |
| **Develop a comprehensive plan for each development. The plan should, at a minimum, incorporate the results of the marketing study and plan, viability assessment, physical needs assessment, available and projected resources, and input of the community.** | | Not Applicable at this time - The Authority will develop a site specific marketing plan after the CHA Agency Plan has been implemented and the communities have been revitalized. The plan will incorporate the results of a marketing study, viability assessment, physical needs assessment and input from the community. | |
| **05C** | | | |
| **Develop coordination procedures between the Force Account Labor Department, Development Managers, and the Occupancy Department. The procedures should ensure units are repaired/rehabilitated on the basis of demand and appropriate personnel are aware of completion dates so units can be promptly occupied.** | 5/30/99 | CHA no longer has a Force Account department. Capital Improvements are performed by the property site manager. | |
| **07D** | | | |
| **Expeditiously implement a job order contracting system.** | 8/30/99 | This performance measure is no longer applicable - the Authority plans to place all CHA properties under private management. | |
| **08D** | | | |
| **Review the results of actions taken to delegate responsibilities to the developments.** | | No longer applicable due to CHA FY 2000 Agency Plan to place all CHA properties under private management. The private management firms will have full management responsibilities for managing the properties. | |

## OPEN RECOMMENDATIONS

| Recommendations | Agreed HUD IG Completion Date | Status | CHA Proposed Target Date |
|---|---|---|---|
| **01A** | | | |
| **Develop and implement procedures and controls to establish and evaluate performance measures for all security initiatives taken.** | 6/30/99 | CHA no longer has a CHA Police Force - but procedures and controls to establish and evaluate security initiatives will still be implemented by the Authority. | 2/1/00 |
| **01B** | | | |
| **Develop site-based security plans for all developments.** | | Site based security plans for all CHA developments are currently in place, but are being revised for private management. | 6/1/00 |
| **06B** | | | |
| **Upon HUD's approval of the viability assessment, incorporate the assessments into its [CHA's] modernization and capital improvement programs and coordinate the modernization and capital improvement programs with the 1998-1999 Comprehensive Grant Program plan.** | 11/30/99 | Pending approval by HUD of the CHA Viability Plan and Agency Plan, the modernization and capitol improvement programs will be incorporated in the Authority's plan. | 2/1/00 |
| **08B** | | | |
| **Implement site-based management plans for each development.** | 6/30/99 | The Authority plans to have all CHA properties under private management by June 2000. Each private manager will be required to develop a site based management plan. In the interim, the Authority will continue to revise/update its current site based management plans. | 3/1/00 |
| **09B** | | | |
| **Revise the resident lease to provide for a waiver of grievance procedures for evictions involving any activity (not just criminal activity) that threatens the health, safety, or right to peaceful enjoyment of the premises by other tenants or housing authority employees.** | 10/15/99 | MAP (QHWRA) and Legal are in the process of reviewing/revising the document. | 2/1/00 |

## OPEN RECOMMENDATIONS

| Recommendations | Agreed HUD IG Completion Date | Status | CHA Proposed Target Date |
|---|---|---|---|
| **09C** | | | |
| **Develop a site-based resident orientation manual and implement a site-based resident orientation process.** | 8/30/99 | The Authority will have a revised site based orientation manual and orientation process implemented by 3/1/00. | 3/1/00 |
| **12B** | | | |
| **Develop policies and procedures that allow the Authority to unilaterally adjust cost center budgets when the budgets fail to comply with target budgets.** | 4/30/99 | The CHA has completed procedures to adjust for cost center budget variances and is presently modifying the procedures to reflect Private Management controls. | 2/1/00 |
| **13A** | | | |
| **Convert the tenant accounting, housing eligibility, work orders, and fixed assets accounting modules to the updated Creative Computer Solutions' versions within six months of the release dates of the updated software.** | 12/31/99 | CCS has not released the SB+ versions of these applications. The Authority will not upgrade until at least 6 months after their release to allow for any major problems to be rectified prior to the Authority upgrading the computer. | 4/1/00 |
| **15B** | | | |
| **Develop coordination procedures between the Risk Management Department, the Customer Service Center, and Development Managers to track and eliminate hazardous conditions at the Authority's developments.** | 6/30/99 | Coordination procedures are being developed. | 2/1/00 |
| **15C** | | | |
| **Develop and implement a safety orientation and training program for its tenants.** | | A safety orientation and training program is being developed by the CHA Risk Management department. | 2/1/00 |
| **16B** | | | |
| **Incorporate Management Information Systems department courses into the centralized training system.** | 8/30/99 | The CHA MIS department is in the process of developing new training courses. | 3/1/00 |

## OPEN RECOMMENDATIONS

| Recommendations | Agreed HUD IG Completion Date | Status | CHA Proposed Target Date |
|---|---|---|---|
| **16C** | | | |
| **Complete the revisions of all remaining job descriptions.** | 9/30/99 | The Authority will ensure that all open job descriptions will be revised/updated by 3/1/00. | 3/1/00 |

## OPEN RECOMMENDATIONS

| Recommendations | Agreed HUD IG Completion Date | Status | CHA Proposed Target Date |
|---|---|---|---|
| **01A** | | | |
| **Develop and implement procedures and controls to establish and evaluate performance measures for all security initiatives taken.** | 6/30/99 | CHA no longer has a CHA Police Force - but procedures and controls to establish and evaluate security initiatives will still be implemented by the Authority. | 2/1/00 |
| **01B** | | | |
| **Develop site-based security plans for all developments.** | | Site based security plans for all CHA developments are currently in place, but are being revised for private management. | 6/1/00 |
| **06B** | | | |
| **Upon HUD's approval of the viability assessment, incorporate the assessments into its [CHA's] modernization and capital improvement programs and coordinate the modernization and capital improvement programs with the 1998-1999 Comprehensive Grant Program plan.** | 11/30/99 | Pending approval by HUD of the CHA Viability Plan and Agency Plan, the modernization and capitol improvement programs will be incorporated in the Authority's plan. | 2/1/00 |
| **08B** | | | |
| **Implement site-based management plans for each development.** | 6/30/99 | The Authority plans to have all CHA properties under private management by June 2000. Each private manager will be required to develop a site based management plan. In the interim, the Authority will continue to revise/update its current site based management plans. | 3/1/00 |
| **09B** | | | |
| **Revise the resident lease to provide for a waiver of grievance procedures for evictions involving any activity (not just criminal activity) that threatens the health, safety, or right to peaceful enjoyment of the premises by other tenants or housing authority employees.** | 10/15/99 | MAP (QHWRA) and Legal are in the process of reviewing/revising the document. | 2/1/00 |

## OPEN RECOMMENDATIONS

| Recommendations | Agreed HUD IG Completion Date | Status | CHA Proposed Target Date |
|---|---|---|---|
| **09C** | | | |
| **Develop a site-based resident orientation manual and implement a site-based resident orientation process.** | 8/30/99 | The Authority will have a revised site based orientation manual and orientation process implemented by 3/1/00. | 3/1/00 |
| **12B** | | | |
| **Develop policies and procedures that allow the Authority to unilaterally adjust cost center budgets when the budgets fail to comply with target budgets.** | 4/30/99 | The CHA has completed procedures to adjust for cost center budget variances and is presently modifying the procedures to reflect Private Management controls. | 2/1/00 |
| **13A** | | | |
| **Convert the tenant accounting, housing eligibility, work orders, and fixed assets accounting modules to the updated Creative Computer Solutions' versions within six months of the release dates of the updated software.** | 12/31/99 | CCS has not released the SB+ versions of these applications. The Authority will not upgrade until at least 6 months after their release to allow for any major problems to be rectified prior to the Authority upgrading the computer. | 4/1/00 |
| **15B** | | | |
| **Develop coordination procedures between the Risk Management Department, the Customer Service Center, and Development Managers to track and eliminate hazardous conditions at the Authority's developments.** | 6/30/99 | Coordination procedures are being developed. | 2/1/00 |
| **15C** | | | |
| **Develop and implement a safety orientation and training program for its tenants.** | | A safety orientation and training program is being developed by the CHA Risk Management department. | 2/1/00 |
| **16B** | | | |
| **Incorporate Management Information Systems department courses into the centralized training system.** | 8/30/99 | The CHA MIS department is in the process of developing new training courses. | 3/1/00 |

## OPEN RECOMMENDATIONS

| Recommendations | Agreed HUD IG Completion Date | Status | CHA Proposed Target Date |
|---|---|---|---|
| **16C** | | | |
| **Complete the revisions of all remaining job descriptions.** | 9/30/99 | The Authority will ensure that all open job descriptions will be revised/updated by 3/1/00. | 3/1/00 |

# CHICAGO HOUSING AUTHORITY

# SENIOR DESIGNATED HOUSING PLAN

**January 6, 2000**

## I. Overview[1]

### A. Designated Buildings

The Chicago Housing Authority (CHA) has submitted a One and Five Year Plan that calls for the designation of all 58 Senior Buildings as Senior-Only. (Attached is a listing of the 58 buildings). The CHA designated 20 buildings as senior-only in 1996 and plans to add 38 buildings as a result of this request. The CHA submits this application for designation pursuant to Notice PIH 97-12, extended by Notice PIH 98-24. In this application, the CHA seeks to extend the status of its 20 buildings designated in 1996 and to change the status of its remaining 38 Senior buildings.

### B. Unit & Household Profile

The chart below shows the current unit and household profiles of the 38 Senior buildings in mixed population status. For a more detailed profile of the CHA senior buildings, see Exhibits 1 and 2 attached.

| Building and Household Profile as of December 1999 | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | Total Build-ings* | Total Units** | Vacant Units | Occupied Units | Live-in Janitors | Total Seniors | 50-61 | | Under 50 | |
| | | | | | | | Not PWD*** | PWD | Not PWD | PWD |
| **Current Mixed Population** | 38 | 6,925 | 962 | 5,963 | 20 | 3,838 | 352 | 732 | 348 | 693 |
| **Current Senior Designated** | 20 | 2,934 | 568 | 2,366 | 3 | 1,807 | 131 | 219 | 80 | 129 |
| **Total Units** | 58 | 9,859 | 1,530 | 8,329 | 23 | 5,645 | 483 | 951 | 428 | 822 |

*This number excludes the scattered site senior building 1506-1514 E. 70th St. This building will not be designated.
**This number excludes the 5 units from the scattered site building listed above. These units will not be designated.
***Persons With Disabilities

### C. Impact on Non-elderly Persons with Disabilities

1. Right to Remain

[1] The data in this designated housing plan may differ from the data included in the CHA's Five-year and Annual Plans, and Plan for Transformation due to changes in the waiting list and occupancy totals subsequent to the drafting of those Plans.

Pending HUD approval of Senior-Only designation, non-elderly persons with disabilities who live in the all 58 designated buildings will not be required to relocate. Instead, they will have three options:

(a) remain in the designated building;
(b) voluntarily transfer to an accessible or other unit in family or scattered site housing; or
(c) choose the Section 8 Housing Choice Voucher Program.

2. Notice and Available Services

The CHA will provide written notice to all residents in the additional 38 buildings to be designated as part of this proposal. The notice will describe the effects of designation and resident options under the designation plan. Additionally, CHA will provide the following services to any resident of the non-designated class who chooses to relocate:

(a) counseling;
(b) moving assistance;
(c) utility and cable connections paid;
(d) reasonable transfer and moving costs paid; and
(e) for Section 8 moves, security deposit paid.

Seniors and near-elderly who continue in occupancy will receive other services discussed in Section IIIC of this designation plan.

3. Rental Assistance Available for Non-Elderly Persons with Disabilities Residents

The CHA has allocated in 50 vouchers per year for residents choosing to relocate from senior designated buildings. The CHA plans to revise the Section 8 Administrative Plan and increase the number of vouchers allocated for this purpose to 100 annually. Therefore, the increased number of vouchers will lessen the impact of the designation of all CHA senior buildings as Senior-Only.

4. Rental Assistance Available for Non-Elderly Persons with Disabilities on the Public housing Waiting List

In June of 1999, the CHA applied for Rental Assistance for Non-Elderly Persons with Disabilities available in the Notice of Funding Availability [Docket No. FR-4412-N-01]. These Housing Vouchers are targeted to assist non-elderly families who remain on the waiting list as a result of the designation. HUD has awarded the CHA 200 vouchers to assist families on the waiting list.

5. CHA's Plan for Transformation

Pending HUD approval, the CHA will implement its Plan for Transformation in response to the Quality Housing & Work Responsibility Act (QHWRA). The CHA's Plan for

Transformation outlines several initiatives that will be taken to ensure the needs of persons with disabilities are met.

The Plan initiatives include the demolition of 18,000 public housing units and the rehabilitation/redevelopment of 24,000 units. The net effect of this undertaking will result in a guaranteed hard unit for every current lease-compliant resident. In accordance with Section 504, 5% or 1200 units will be mobility accessible and an additional 2% or 480 units will be hearing/vision accessible. These numbers reflect improvements planned for both family sites and the senior buildings.

Additionally, Section 8 Housing Choice Vouchers will be requested for each hard unit demolished under the Plan. To increase access to the Section 8 Program by persons with disabilities, the CHA will provide incentives such as the Access Improvement Fund, counseling, and other services. The Access Improvement Fund is a new program to assist private landlords and certificate holders in making modest alterations to units in an effort to make the unit accessible. The program is further explained in Section II. 6 of this application.

## II. Reasons for Designation

### A. Senior-Only Buildings

As the supply of accessible units in CHA's family and scattered site developments increases through rehabilitation and new construction efforts, it is no longer necessary to house non-elderly persons with disabilities in Senior buildings. A portion of the housing needs for non-senior persons with disabilities as described in the City of Chicago's Consolidated Plan will be met by CHA with new and rehabilitated units and targeted Section 8 vouchers.

### B. Meeting Needs of Non-Designated Groups

1. CHA Accessibility Initiatives

The Five-Year Redevelopment portion of the Plan calls for the demolition of 18,000 public housing units and the rehabilitation/redevelopment of 24,000 units.

The ABLA developments can serve as an example of how this process will work with respect to accessibility. ABLA currently has 3,235 total units, 1,180 occupied. After the revitalization, this development will have a total of 3,278 units, 1,463 of which will be public housing units. Of the completed 1,463 public housing units, 5% or 73 will be mobility accessible, and another 2% or 29 will be hearing/vision impaired accessible.

The Plan outlines other commitments the CHA will make in the next five years to providing accessible facilities to persons with disabilities. These commitments include:

- The 24,000-rehabilitated/redeveloped housing units (which are comprised of all senior units and 14,141 family units and scattered site units) will be in compliance with all applicable federal, state, and local accessibility and fair housing laws.
- All entrances and common areas in non-scattered site family buildings will be accessible.
- Where possible, developers will be required to adopt the concept of "visitability" as a site and building design practice.
- CHA will encourage development options that include adaptable units above the 5% minimum required for accessibility.
- At the family sites, the CHA will ensure that a minimum of 750 family units will be fully accessible and another 300 family units will be accessible for the hearing/vision impaired. These commitments exceed the minimum requirements of Section 504. See the chart below for more details.
- The new A & O and Occupancy Policy creates a system for occupying accessible housing units. Offers will be made first to current residents who need the unit features, then to applicants who need such features. The policy includes other changes to enhance accessibility as discussed in paragraph B. 3. below.

| Minimum Requirements of Accessible Units | | | | |
|---|---|---|---|---|
| **Types of Units** | **Percentage of Units** | **Family Developments** | **Senior-Only Developments** | **Total** |
| **Non-Accessible Units** | 93% | 13,151 | 9,169 | 22,320 |
| **Section 504 Units** | 5% | 707*<br>(*750 proposed) | 493 | 1,200 |
| **Hearing/Vision Impaired Units** | 2% | 283*<br>(*300 proposed) | 197 | 480 |
| **Total Number of Units** | 100% | 14,141 | 9,859 | 24,000 |

2. Existing Waiting List and Non-Designated Households

The CHA's waiting lists have 3,339 persons with disabilities who could be affected by this designation. CHA cannot meet this need even if all existing units were 504 compliant. Over the next three years, the CHA commits to rehabilitate family units for applicants who move to the top of the senior waiting lists. The CHA will continue to offer housing to these households with the understanding that family units will need to be rehabilitated to meet any associated accessibility requirements for the household. After the three years redevelopment activity will result in an increased supply of units for persons with disabilities.

Furthermore, to the extent that any of these households are on an existing senior site-based waiting list, they will not lose their place on that waiting list provided that their date of application is prior to the date the designation is approved. As these families come to the top of the senior site-based waiting lists, they will be advised of their option to secure a rehabilitated unit in a family site or obtain a Section 8 Voucher. After designation, the CHA will close the senior waiting lists to persons with disabilities. Subsequent to designation only the elderly and near-elderly age groups will be offered housing in the senior buildings. Persons with disabilities who are also elderly or near-elderly will continue to be admitted to senior buildings.

3. Transfers and Modifications

The CHA's revised Admissions & Occupancy Policy ("A & O") also demonstrates a strong commitment to accessibility. It is the CHA's policy that accessibility modifications to units will be made prior to applicant move-in. For the first time, a schedule is established for these modifications: 30 days for modifications under $1,000, and 60 days (or in accordance with an applicant approved construction schedule) for modifications in excess of $1,000. An accessible unit must be on an accessible route and the family living in the unit must have access to common areas and other facilities associated with the property. CHA will also apply these requirements to residents in need of unit modifications.

If the applicant family needs accessible features, refusal of an offer of housing due to lack of those features at a particular location will not affect the family's position on the waiting list.

4. Rental Assistance for Non-Elderly Persons with Disabilities

As mentioned previously, in 1999 the CHA was awarded 200 Housing Choice Vouchers targeted for non-elderly persons with disabilities on the CHA waiting lists impacted by designation.

The CHA will amend its Section 8 Administrative Plan and use these vouchers for both existing residents who choose to transfer out of designated buildings and persons with disabilities on the public housing waiting list. The amended Administrative Plan will identify the use of these vouchers as a special admissions category [See 24 CFR 986.203(a)(2)], with priority going first to families on the public housing waiting list and then to families who are current residents.

The CHA currently provides an 50 of its Housing Choice Vouchers each year to persons with disabilities moving from a senior designated building. The CHA is revising the Section 8 Administrative Plan and will increase this number to 100 Housing Choice Vouchers.

The total vouchers targeted to both existing residents and families on the waiting list equals 300.

5. Maximum Housing Choice for Residents and Applicants

In order to foster housing choice for CHA residents and applicants, the CHA will advise non-elderly persons with disabilities of the option to receive Section 8 assistance. The group of residents notified includes all non-elderly persons with disabilities living in Senior buildings and those on the public housing waiting list who would have been housed in the twelve (12) months following the designation. (Depending on the rate that new applicants our housed CHA may also notify additional families on the list.)

6. Section 8 Program and Accessibility Support Initiatives

Persons with disabilities will benefit from the following initiatives under the Section 8 Program:

The CHA was able to convert 250 Section 8 Housing Choice Vouchers in the amount of $2.6 million to provide mobility counseling for second moves within the Section 8 Program. These services will be available to persons with disabilities who opt for a voucher as a result of designation. CHA will make these services available to persons with disabilities both at the initial move and at any subsequent moves. Services include intake, family assessment and individual counseling. Post-move services to will also be provided, such as telephone contact within one week and home visits within one

month of move in. Information and referrals will also be made to families as they adjust to their new environment.

The CHA will increase the supply of available accessible housing to persons with disabilities by recruiting property managers and owners with accessible units to participate in the Section 8 Program. In addition, CHA will approve exception rents up to 20% over Fair Market Rent (FMR) for a family that includes a person with a disability. Through the Access Loan Fund, CHA will provide $250,000 in financial incentives for landlords and applicants who wish to make accessibility improvements to the unit.

Section 8 participants, including persons with disabilities, also receive financial assistance through the Security Deposit Loan Fund. The Fund provides payment of the security deposit. Lastly, the CHA will continue to aggressively apply for additional funding to increase the number of Section 8 vouchers targeted to persons with disabilities.

**Designation Activities and Resources -- Summary Chart**

| | **Non-Elderly Person with Disabilities** | |
|---|---|---|
| | **Applicant on Public Housing Waiting List** | **Resident of Designated Building** |
| **Notice of Designation** | Yes, provided to families that would have been housed within one year of designation. | Yes, all affected households will receive written notice. |
| **Status on Waiting List** | No loss of place on waiting list if application date is prior to date of designation. | N/A |
| **Housing Options** | Accessible unit in a family development or Section 8 Voucher.<br>*Move to existing accessible unit or CHA will rehabilitate units as required. | Transfer to accessible unit in a family development or take a Section 8 Voucher.<br>*Move to existing accessible unit or CHA will rehabilitate units as required. |
| **Number of Vouchers (300 Total)** | 200 Vouchers<br><br>(Targeted to non-elderly persons with disabilities; considered special admissions.) | 100 Vouchers<br><br>(Section 8 currently allocates 50 vouchers per year to non-elderly persons with disabilities moving out of designated buildings. Upon revision of the Administrative Plan this number will increase to 100 vouchers annually.) |
| **Services** | ▪ For Section 8 move, paid security deposit.<br>▪ Access Loan Fund.<br>▪ Proposed counseling. | Resident moving as a result of designation will be considered as a relocatee that is entitled to the following services:<br>▪ Mobility counseling<br>▪ Moving assistance<br>▪ Utility and cable connection<br>▪ Reasonable moving costs<br>If resident takes a Section 8 voucher, also entitled to:<br>▪ Paid security deposit<br>▪ Access Loan Fund<br>▪ Post-move services |

## III. Alternative Resources

### A. Balancing Demand and Supply

The demand for housing by non-elderly persons with disabilities in the City of Chicago is high and the CHA on its own cannot meet the needs of this population. In developing this plan, CHA has estimated the number of families that would have been served but for the proposed designation.

This application focuses on estimating the supply impact of the designation.

**Demand**

The charts below reflects the breakdown of the CHA waiting list by age stratification and person with disabilities, as well as the Section 8 waiting list by persons with disabilities:

| PHA Waiting List | | | |
|---|---|---|---|
| | Persons without Disabilities | Persons with Disabilities | Total |
| 62 & Older | 1,533 | 868 | 2,401 |
| 50 to 61 | 2,573 | 953 | 3,526 |
| Under 50 | 26,406 | 3,339 | 29,745 |

| Section 8 Waiting List | | | |
|---|---|---|---|
| | Persons without Disabilities | Persons with Disabilities | Total |
| Applicants | 22,500 | 7,500 | 30,000 |

Even with full funding and complete rehabilitation of all public housing units, CHA cannot meet the existing demand. But what is the affect of designation on available resources? In the sections that follow CHA estimates the units currently available based on move out rates and vacancy reduction. These numbers more accurately reflect the number of families that could be impacted by the proposed designation.

**Supply**

The breakdown of current senior and mixed population residents by age and person with disabilities is provided in the following charts:

| Mixed Population – Current Profile | | | | | |
|---|---|---|---|---|---|
| Age Group | Persons without Disabilities | % | Persons with Disabilities | % | Total |
| 62 & Older | 1,930 | 32% | 1,908 | 32% | 3,838 |
| 50 to 61 | 352 | 6% | 732 | 12% | 1,084 |
| Under 50 | 348 | 6% | 693 | 12% | 1,041 |
| Total | 2630 | 44% | 2333 | 56% | 5,963 |

| Designated Senior Only – Current Profile* | | | | | |
|---|---|---|---|---|---|
| Age Group | Persons without Disabilities | % | Persons with Disabilities | % | Total |
| 62 & Older | 1,121 | 47% | 686 | 29% | 1,807 |
| 50 to 61 | 131 | 6% | 219 | 9% | 350 |
| Under 50 | 80 | 4% | 129 | 5% | 209 |
| Total | 1332 | 57% | 1034 | 43% | 2366 |

*This data is based on actual move outs from January 1999 to November 1999. Therefore, projections must be made to estimate the turnover rate for fiscal year 1999.

The following charts show the breakdown of CHA's current mixed population and senior units by vacancy status, as well as move out by age group and disability status:

| Total Units – Current Profile | | |
|---|---|---|
| | Mixed Population | Designated Senior Only |
| Occupied Units | 5,963 | 2,366 |
| Vacant Units | 962 | 568 |
| Total Units | 6,925 | 2,934 |

| Move Outs – 11/30/99 | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | Mixed Population | | | | Senior Only | | | |
| Age Group | Total Move Outs | Persons without Disabilities | % | Persons with Disabilities | % | Persons without Disabilities | % | Persons with Disabilities | % |
| 62 & Older | 840 | 286 | 23% | 296 | 25% | 153 | 12% | 105 | 9% |
| 50 to 61 | 179 | 39 | 3% | 105 | 9% | 7 | 1% | 28 | 2% |
| Under 50 | 187 | 55 | 5% | 102 | 8% | 12 | 1% | 18 | 2% |
| Total | 1206 | 380 | 31% | 503 | 42% | 172 | 14% | 151 | 13% |

## B. Impact of Designation

To determine the impact of the Senior-Only designation on the supply of public housing, four factors need to be considered:

1. The move out numbers and rate for people with disabilities in the current mixed population buildings. This number is an indicator of the "true" level of annual assistance that CHA can provide to people with disabilities.

2. Vacancy backlog in the mixed population buildings. Currently there are 962 vacancies in the mixed-population buildings. The expectation is that as these buildings are rehabilitated, vacant units (above the turnover number) would be

made ready and available over the next few years to persons with disabilities. With designation, these units are also removed from immediate supply of housing for people with disabilities and need to be factored into the impact analysis.

*3.* That over the long-term(first 5 years), CHA will increase the supply of units for people with disabilities as redevelopment activities proposed by the Plan for Transformation are implemented. CHA will take very definite steps to reach the unit targets noted earlier in this designation plan by establishing RFP criteria that focus on housing for people with disabilities.

4. That for any family or a senior on the family waiting list CHA intends to mitigate the impact of the designation by repair or rehabilitation to existing viable family units. Repairs will be conducted in accordance with the Admissions and Occupancy Policy. CHA recognizes that the redevelopment plans are long-term solutions to housing and that for an interim period Section 8 vouchers (previously discussed) plus this commitment to unit repair or rehabilitation will be needed to offset the immediate impact of designation.

The explanation provided below is a brief walk-through of CHA's impact analysis and the estimate of resources available post-designation to offset the initial impact of the designation.

Turnover: This number is estimated by taking the sum of move-outs through November 30, 1999, determining the monthly average, then multiplying by 12. In identifying this number CHA has used the move-outs for people with disabilities in both the 50 to 61 age group and under 50 age groups.[2]
In addition, 55 families under 50 years of age are listed as persons without disabilities. Because not all families identify as households with disabilities CHA also included these families in the turnover calculation. CHA believes that these slightly higher numbers capture any family that might be impacted by the designation.

| **PEOPLE IN THE AGE GROUP** | | **MOVE-OUTS** |
|---|---|---|
| With disabilities | 30 to 61 | 105 |
| With disabilities | Under 50 | 102 |
| Without disabilities | Under 50 | 55 |
| **TOTAL** | | **262** |
| **Conclusion: 262** move-outs through 11/30/99 is annualized to **286** move-outs per year | | |

Vacancy levels: As of 11/30/99, the 38 mixed population buildings have 962 vacant units. Assuming that current population percentages remain constant, absent the

[2] Note that near elderly families with disabilities will still be served by the CHA. However, this number is included to provide some margin should families in the near-elderly group choose to move.)

designation, some portion of these vacant units would go to persons with disabilities. Persons with disabilities in the 50 to 61 age group number 1,084 households and in the under 50 age group the number is 1,04 representing a total of 2,125 households in the mixed population buildings. This equals 54% of all households in residence. In estimating the number of vacant units that could be used to house people with disabilities, CHA has applied the existing occupancy percentage to the number of vacant unit and estimates that as many as 519 of these units (absent the designation) could go to people with disabilities.

The charts that follow summarize the impact analysis:

**Impact of Designation**

| **Year** | **2000** | **2001** | **2002** | **2003** | **2004** | **Total** |
|---|---|---|---|---|---|---|
| Annual Turnover Number | 286 | 286 | 207[3] | 207 | 207 | 1,193 |
| Vacant backlog units readied for re-occupancy but no longer available to persons with disabilities | 173 | 173 | 173[4] | N/A | N/A | 519 |
| **TOTAL** | **459** | **459** | **380** | **207** | **207** | **1,712** |

**Offset**

| **Year** | **2000** | **2001** | **2002** | **2003** | **2004** | **Total** |
|---|---|---|---|---|---|---|
| Transfer vouchers | 50 | 100[5] | 100 | 100 | 100 | 450 |
| Waiting list vouchers | 200[6] | 20[7] | 20 | 20 | 20 | 280 |
| Rehabilitation/access (as required)[8] | 160 | 240 | 80 | | | 480 |
| Rehabilitation/hearing and vision[9] | 50 | 50 | 20 | | | 120 |
| Redevelopment activity[10] | 0 | 50 | 150 | 180 | 230 | 610 |
| **TOTAL** | **460** | **460** | **370** | **300** | **350** | **1,940** |

[3] Estimates for out-years are based on 1999 move-outs for persons with disabilities in the age group, 50 to 61 and under 50 only.
[4] After 2002 the vacancy backlog in senior buildings will be caught up.
[5] The Section 8 Administrative Plan will be revised to provide 100 vouchers per year to people with disabilities transferring out of the designated buildings.
[6] CHA will apply for additional targeted vouchers each year, but for purposes of this analysis no additional vouchers are shown.
[7] Represents turnover of 20 vouchers to be reused for targeted families.
[8] CHA commits to rehabilitate family units for households with mobility impairments on the senior waiting lists when such families opt to live at a family development.
[9] CHA commits to rehabilitate family units for households with hearing and vision impairments on the senior waiting lists when such families opt to live at a family development.
[10] Redevelopment and rehabilitation figures represent units coming on-line as redevelopment plans move forward.

### Near Elderly Families Eligible for Senior Housing

Under this plan, the CHA will continue to admit near-elderly families when there are insufficient numbers of elderly families to fill all the units in a project.

## IV. PROJECT DESCRIPTION

### A. Profile

The CHA currently designates 20 buildings as “senior-only” buildings and 38 buildings as “mixed-population” buildings.

| Current Designation | Total Buildings | Total Units | Occupied Units | Vacant Units |
|---|---|---|---|---|
| Mixed-Population | 38 | 6,925 | 5,963 | 962 |
| Senior-Only | 20 | 2,934 | 2,366 | 568 |
| Total | 58 | 9,859 | 8,329 | 1,530 |

Attached as Exhibit 1 is a detailed Unit Status Report by building. Under this plan, all units listed above will be designated senior-only.

### B. Snapshot of Tenants in Residence

Existing families housed (with and without disabilities) total 5,645 households. The current distribution of these families is represented in the following chart:

| Designation | Over 62 PW/D) | Over 62 PWD |
|---|---|---|
| Mixed-Population | 1,930 | 1,908 |
| Senior-Only | 1,121 | 686 |
| Total | 3,051 | 2,594 |

Attached as Exhibit 2 is a detailed Resident Status Report by building. Under this plan, all households listed above will be eligible for the senior-only designated housing.

### C. Supportive Services/Senior Programs

For seniors and near-elderly families the Gladys L. Reed Senior Programs Division provides a number of supportive services. Gladys L. Reed gave forty years of service to the Chicago Housing Authority. In her honor the Gladys L. Reed Senior Programs Division continues to advocate for the rights of the residents living in the Chicago Housing Authority’s 58 senior buildings.

1. Social Services

   (a) Social Service Referrals—Program staff are on call 24 hours a day to trouble shoot social issues within the 58 CHA Senior Buildings. Upon receiving a referral counselors will conduct a home visit to complete a Needs Assessment. Referral services include but are not limited to:

- Substance Abuse
- Poor Housekeeping
- Non-Payment of Rent
- Special Transportation
- Crisis Debriefings
- Emergency Food & Shelter
- Homemaker/Visiting Nurse
- Medical Physical/Mental Illness
- Application & Assistance

(b) Viable Support—Residents receive counseling and general information on services, benefits and programs. Staff will assist residents by completing forms, applications and provide translators for residents who speak English as a second language.
(c) Social and Educational Programs—This program brings seniors together in a variety of social and educational settings to promote socialization and prevent isolation.
(d) Information and Referral—Program staff extends assistance to residents in searching through and identifying a variety of public and private programs available for seniors.
(e) Management Support—Provides support to housing management for issues such as anti-social behavior, non-payment of rent, and poor housekeeping.

2. Victim Witness Assistance

(a) Short Term Counseling—Staff interacts and lend support to residents who have been victims or witnesses of a crime.
(b) Relocation—Staff helps relocate victims of crime and their families to ensure their safety.
(c) Referrals—Staff completes assessments and then make arrangements with the appropriate resources to ensure that services are delivered to residents.
(d) Crime Prevention Workshops—Workshops are offered in all of the CHA buildings to make seniors aware of criminal activities and available services for victims and witnesses of crime.
(e) Information and Resources—Provides information about the criminal justice system, order of protection and victim compensation.
(f) Court Advocacy—Provides escort services, support in court and transportation to and from court.

3. Special Programs

(a) Mammography Screening—Provides monthly mammography screenings for women residing in CHA senior buildings.
(b) Men's Day at CHA—This program is designed for men only to familiarize them with vital health, nutrition and exercise information.
(c) Senior Wellness Fest—This yearly event disseminates pertinent health information and provides health screening for residents in the Chicagoland area.
(d) Adopt-A-Senior Building Program—This project encourages public and private sector collaboration to provide physical improvements in senior buildings.

(e) Bridging Generations—The intergenerational program seeks to bridge the generation gap among senior citizens and youth. The program encourages conversations and interaction, identifying experiences and knowledge of both generations.

(f) Leadership Building—Facilitate monthly meetings with CHA senior management staff and building presidents to ensure the needs are met in the CHA senior buildings.

4. Special Events and Activities

The following activities are offered in all 58 senior buildings throughout the year. Many activities below are regularly scheduled programs. Buildings may request special events and activities that will be tailored to the specific needs of the residents.

- Concerts
- Game Day
- Birthday Clubs
- Healthy Living Support Groups
- Book Clubs
- State I.D.s
- Gardening Club
- Movie Day
- Arts & Crafts
- MAC Program
- Field Trips
- Parties
- Mother's and Father's Day Celebrations
- Shopping Trips
- Cook County Mammography Mobile
- Special Transportation/ Application Assistance
- Crime Prevention Training
- Immunization Shots
- Public Safety Workshops
- Educational Programs
- Holiday Events
- Volunteer Programs