

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

Whatcom County Housing Authority

**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: Whatcom County Housing Authority

PHA Number: WA041

PHA Fiscal Year Beginning: (mm/yyyy) 10/2000

Public Access to Information

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

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

Display Locations For PHA Plans and Supporting Documents

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

- Main administrative office of the PHA
- PHA development management offices
- PHA local offices
- Main administrative office of the local government
- Main administrative office of the County government
- Main administrative office of the State government
- Public library
- PHA website
- Other (list below)

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)

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: (state mission here)

Our mission is to provide quality, affordable housing for low- and moderate-income families, elderly households, and persons with disabilities through innovative resource development and responsible stewardship of our housing and fiscal resources.

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 the **PHAs ARE STRONGLY ENCOURAGED TO IDENTIFY QUANTIFIABLE MEASURES OF SUCCESS IN REACHING THEIR OBJECTIVES OVER THE COURSE OF THE 5 YEARS.** (Quantifiable measures would include targets such as: numbers of families served or PHAS scores achieved.) PHAs should identify these measures in the spaces to the right of or below the stated objectives.

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

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

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

PHA Goal: Increase assisted housing choices

Objectives:

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

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

PHA Goal: Provide an improved living environment

Objectives:

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

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

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

Objectives:

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

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

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

Other PHA Goals and Objectives: (list below)

1. Continue to manage the Whatcom County Housing Authority's existing public housing program in an efficient and effective manner thereby qualifying as at least a standard performer under the Public Housing Assessment System (PHAS).
2. Achieve PHAS Standard Performer status for the Whatcom County Housing Authority by September 30, 2001.
3. Enhance the marketability of the Whatcom County Housing Authority's high-rise public housing units for the elderly.
4. The Whatcom County Housing Authority shall maintain and enhance the physical security aspects of its buildings.
5. Manage the Whatcom County Housing authority's tenant-based program in an efficient and effective manner thereby qualifying as at least a standard performer under SEMAP.

6. The Whatcom County Housing Authority shall achieve and sustain a utilization rate of 98 percent by September 30, 2001, in its tenant-based program.

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.

This first Whatcom County Housing Authority Agency Plan describes the programs, policies and practices that WCHA will carry out in its Fiscal Year beginning October 1, 2000. In general WCHA will continue the same course of action that has proved successful over the last decade in meeting the needs of residents and the community, within the limits of available resources. WCHA will continue to focus on its mission and Agency Goals (set forth above), stressing sound property management and maintenance and Section 8 administration. WCHA will also continue its successful development of additional affordable housing developments and work with other community partners to address the critical shortage of affordable housing in Whatcom County.

The Quality Housing and Work Responsibility Act of 1998 (“QHWRA”) requires WCHA to make some adjustments in its policies and practices, as shown in the Admission and Occupancy Policies for public housing attached to the draft Agency Plan. The required changes on rent determination include “flat rents,” “choice of rents,” hardship waivers of minimum rents, temporary rent freezes (incremental earned income disregards) for newly employed workers, and rent changes when welfare grants are sanctioned.

The WCHA Board of Commissioners has adopted some of these policies on an interim basis to comply with HUD requirements, while inviting comments from residents and the community through the Agency Plan public notice and hearing process.

Another new policy change required by federal law directs adult public housing residents to perform eight hours each month of “volunteer community service” (excluding employed residents, those in training programs; elderly and disabled residents and their caretakers). HUD has now issued a final regulation on volunteer community service, so staff will be planning the implementation and conferring with residents, staff and community agencies.

iii. Annual Plan Table of Contents

[24 CFR Part 903.79 (r)]

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

Table of Contents

	<u>Page #</u>
Annual Plan	
i. Executive Summary	1
ii. Table of Contents	2
1. Housing Needs	5
2. Financial Resources	12
3. Policies on Eligibility, Selection and Admissions	13
4. Rent Determination Policies	23
5. Operations and Management Policies	27
6. Grievance Procedures	28
7. Capital Improvement Needs	29
8. Demolition and Disposition	33
9. Designation of Housing	34
10. Conversions of Public Housing	35
11. Homeownership	36
12. Community Service Programs	38
13. Crime and Safety	41
14. Pets (Inactive for January 1 PHAs)	43
15. Civil Rights Certifications (included with PHA Plan Certifications)	43
16. Audit	43
17. Asset Management	43
18. Other Information	44

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 to the right of the title.

Required Attachments:

- Admissions Policy for Deconcentration (ACOP wa041a01)

- FY 2000 Capital Fund Program Annual Statement (in text)
- Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY) (wa041e01)
- Community Service Plan (attached at end of template)

Optional Attachments:

- PHA Management Organizational Chart (wa041f01)
- FY 2000 Capital Fund Program 5 Year Action Plan (in text)
- Public Housing Drug Elimination Program (PHDEP) Plan (wa041c01)
- Comments of Resident Advisory Board or Boards (must be attached if not included in PHA Plan text) (wa041g01)
- Other (List below, providing each attachment name)
Definition of Substantial to the Plan (wa041d01)

Supporting Documents Available for Review

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

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

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public Housing Deconcentration and Income Mixing Documentation: 1. PHA board certifications of compliance with deconcentration requirements (section 16(a) of the US Housing Act of 1937 as implemented in the 2/199 <i>Quality Housing and Work Responsibility Act Initial Guidance; Notice</i> and any further HUD guidance) and 2. Documentation of the required deconcentration and income mixing analysis	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public housing rent determination policies, including the methodology for setting public housing flat rents <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Schedule of flat rents offered at each public housing development <input type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
X	Public housing management and maintenance policy documents including policies for the prevention or eradication of pest infestation (including cockroach infestation)	Annual Plan: Operations and Maintenance
X	Public housing grievance procedures <input type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
X	Section 8 informal review and hearing procedures <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
NA	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant year	Annual Plan: Capital Needs
X	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant	Annual Plan: Capital Needs
X	Most recent, approved 5 Year Action Plan for the Capital Fund/Comprehensive Grant Program, if not included as an attachment (provided at PHA option)	Annual Plan: Capital Needs
NA	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
NA	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition
NA	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
NA	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
NA	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership
NA	Policies governing any Section 8 Homeownership program <input type="checkbox"/> check here if included in the Section 8 Administrative Plan	Annual Plan: Homeownership
X	Any cooperative agreement between the PHA and the TANF agency	Annual Plan: Community Service & Self-Sufficiency
X	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
NA	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports	Annual Plan: Community Service & Self-Sufficiency
X	The most recent Public Housing Drug Elimination Program (PHEDEP) semi-annual performance report for any open grant and most recently submitted PHDEP application (PHDEP Plan)	Annual Plan: Safety and Crime Prevention
X	The most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U. S.C. 1437c(h)), the results of that audit and the PHA's response to any findings	Annual Plan: Annual Audit
NA	Troubled PHAs: MOA/Recovery Plan	Troubled PHAs
X	Other supporting documents (optional) Public Housing Lease	(specify as needed)

1. Statement of Housing Needs

[24 CFR Part 903.79 (a)]

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

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

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Afford- ability	Supply	Quality	Access- ibility	Size	Loca- tion

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Loca-tion
Income <= 30% of AMI	1887	5	4	3	3	1	2
Income >30% but <=50% of AMI	1432	5	4	3	3	1	2
Income >50% but <80% of AMI	1412	4	3	2	2	1	1
Elderly	689	4	3	3	3	2	4
Families with Disabilities	Not Avail						
White Non Hisp	3365	5	4	3	3	1	2
Hispanic	<10%	5	4	3	3	1	2
African American	<10%	5	4	3	3	1	2
Race/Ethnicity							

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 (City of Bellingham)
Indicate year: 1998
- U.S. Census data: the Comprehensive Housing Affordability Strategy (“CHAS”) dataset
- American Housing Survey data
Indicate year:
- Other housing market study
Indicate year:
- Other sources: (list and indicate year of information)

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

State the housing needs of the families on the PHA's waiting list. **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			
Waiting list type: (select one)			
<input type="checkbox"/> Section 8 tenant-based assistance			
<input checked="" type="checkbox"/> Public Housing			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	174		24
Extremely low income <=30% AMI	44	25	
Very low income (>30% but <=50% AMI)	44	25	
Low income (>50% but <80% AMI)	87	50	
Families with children	162	93	
Elderly families	12	7	
Families with Disabilities	18	10	
Wht Non Hisp	145	83	
Hispanic	29	17	
Race/ethnicity			
Race/ethnicity			
Characteristics by Bedroom Size (Public Housing Only)			
1BR	48	28	10
2 BR	79	45	4
3 BR	32	18	8

Housing Needs of Families on the Waiting List			
4 BR	15	9	2
5 BR	NA		
5+ BR	NA		
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			
If yes:			
How long has it been closed (# of months)?			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

Housing Needs of Families on the Waiting List			
Waiting list type: (select one)			
<input checked="" type="checkbox"/> Section 8 tenant-based assistance			
<input type="checkbox"/> Public Housing			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	76		
Extremely low income <=30% AMI	48	63	
Very low income (>30% but <=50% AMI)	21	28	
Low income (>50% but <80% AMI)	7	9	
Families with children	52	68	
Elderly families	8	11	
Families with Disabilities	13	17	
White Non Hisp	65	86	
Hisp	11	14	
Race/ethnicity			
Race/ethnicity			

Housing Needs of Families on the Waiting List			
Characteristics by Bedroom Size (Public Housing Only)			
1BR			
2 BR			
3 BR			
4 BR			
5 BR			
5+ BR			
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If yes: How long has it been closed (# of months)? Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

C. Strategy for Addressing Needs

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

(1) Strategies

Need: Shortage of affordable housing for all eligible populations

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

Select all that apply

- Employ effective maintenance and management policies to minimize the number of public housing units off-line
- Reduce turnover time for vacated public housing units
- Reduce time to renovate public housing units
- Seek replacement of public housing units lost to the inventory through mixed finance development
- Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources

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

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

Select all that apply

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

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

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

Select all that apply

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

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

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

Select all that apply

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

Other: (list below)

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

- 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)
State grant applied for to contract with community action agency for housing search assistance.

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	144,708	
b) Public Housing Capital Fund	135,445	

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance		
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)	25,000	
g) Resident Opportunity and Self- Sufficiency Grants		
h) Community Development Block Grant		
i) HOME		
Other Federal Grants (list below)		
Rural Development (elderly)		
Rural Development (2)	154,000	Farm labor housing operations
2. Prior Year Federal Grants (unobligated funds only) (list below)		
3. Public Housing Dwelling Rental Income		
	130,093	Operations
4. Other income (list below)	7,993	operations
Excess utilities	1,854	operations
Interest	5,960	operations
4. Non-federal sources (list below)		
Total resources	605,053	

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)
When families near the top of the waiting list

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

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

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

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

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

(2) Waiting List Organization

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

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

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

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

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

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

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?

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

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

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

(3) Assignment

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

- One
- Two
- Three or More

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

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

(4) Admissions Preferences

a. Income targeting:

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

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)

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)
- For up to 75 applicants, those who are referred in writing by the Northwest Regional Council and who are receiving one or more services and/or ongoing case management from an approved agency.

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

Date and Time

Former Federal preferences:

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

Other preferences (select all that apply)

- 1 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
 - 1 Other preference(s) (list below) (1)
- For up to 75 applicants, those who are referred in writing by the Northwest Regional Council and who are receiving one or more services and/or ongoing case management from an approved agency

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)

(6) Deconcentration and Income Mixing

Not required according to PIH 99-51

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

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

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

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

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

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

B. Section 8

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

(1) Eligibility

- a. What is the extent of screening conducted by the PHA? (select all that apply)
- Criminal or drug-related activity only to the extent required by law or regulation

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

(2) Waiting List Organization

- a. With which of the following program waiting lists is the section 8 tenant-based assistance waiting list merged? (select all that apply)
- None
 - Federal public housing
 - Federal moderate rehabilitation
 - Federal project-based certificate program
 - Other federal or local program (list below)
- b. Where may interested persons apply for admission to section 8 tenant-based assistance? (select all that apply)
- PHA main administrative office
 - Other (list below)

(3) Search Time

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

If yes, state circumstances below:

(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)

3. If the PHA will employ admissions preferences, please prioritize by placing a "1" in the space that represents your first priority, a "2" in the box representing your second priority, and so on. If you give equal weight to one or more of these choices (either

through an absolute hierarchy or through a point system), place the same number next to each. That means you can use “1” more than once, “2” more than once, etc.

Date and Time

Former Federal preferences

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

Other preferences (select all that apply)

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

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

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

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

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

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

- The PHA applies preferences within income tiers

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

(5) Special Purpose Section 8 Assistance Programs

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

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

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

- Through published notices
 Other (list below)

4. PHA Rent Determination Policies

[24 CFR Part 903.7 9 (d)]

A. Public Housing

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

(1) Income Based Rent Policies

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

a. Use of discretionary policies: (select one)

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

---or---

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

b. Minimum Rent

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

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

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

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

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

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

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

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

f. Rent re-determinations:

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

Never

- At family option
- Any time the family experiences an income increase
- Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold)_____
- Other (list below)
Any time there is a change

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

(2) Flat Rents

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

- The section 8 rent reasonableness study of comparable housing
- Survey of rents listed in local newspaper
- Survey of similar unassisted units in the neighborhood
- Other (list/describe below)

B. Section 8 Tenant-Based Assistance

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

(1) Payment Standards

Describe the voucher payment standards and policies

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

- At or above 90% but below 100% of FMR
- 100% of FMR
- Above 100% but at or below 110% of FMR
- Above 110% of FMR (if HUD approved; describe circumstances below)

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

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

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

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

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

- Annually
- Other (list below)

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

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

(2) Minimum Rent

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

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

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

5. Operations and Management

[24 CFR Part 903.7 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. wa041f01
- A brief description of the management structure and organization of the PHA follows:

B. HUD Programs Under PHA Management

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

Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	63	2
Section 8 Vouchers	0	
Section 8 Certificates	0	
Section 8 Mod Rehab	0	
Special Purpose Section 8 Certificates/Vouchers (list individually)	0	
Public Housing Drug Elimination Program (PHDEP)	63	2
Other Federal Programs(list individually)		
Rural Dev't 574/516	24	6
Rural Dev't 515	11	4

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)

ACOP
Grievance Procedure
Rental Agreement
Drug-Free Workplace
Personnel Policy
Investment Policy
Rent Collection Policy
Asset Management
Procurement Policy

(2) Section 8 Management: (list below)

Administrative Plan including Grievance Procedure
Welfare-to-Work and Mainstream Vouchers Application

6. PHA Grievance Procedures

[24 CFR Part 903.7 9 (f)]

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

A. Public Housing

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

If yes, list additions to federal requirements below:

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

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

B. Section 8 Tenant-Based Assistance

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

If yes, list additions to federal requirements below:

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

7. Capital Improvement Needs

[24 CFR Part 903.79 (g)]

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

A. Capital Fund Activities

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

(1) Capital Fund Program Annual Statement

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

Select one:

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

-or-

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

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

Capital Fund Grant Number FFY of Grant Approval: (2000)

Original Annual Statement

Line No.	Summary by Development Account	Total Estimated Cost
1	Total Non-CGP Funds	
2	1406 Operations	135,445
3	1408 Management Improvements	0
4	1410 Administration	0
5	1411 Audit	0
6	1415 Liquidated Damages	0
7	1430 Fees and Costs	0
8	1440 Site Acquisition	0
9	1450 Site Improvement	0
10	1460 Dwelling Structures	0
11	1465.1 Dwelling Equipment-Nonexpendable	0
12	1470 Nondwelling Structures	0
13	1475 Nondwelling Equipment	0
14	1485 Demolition	0
15	1490 Replacement Reserve	0
16	1492 Moving to Work Demonstration	0
17	1495.1 Relocation Costs	0
18	1498 Mod Used for Development	0
19	1502 Contingency	0
20	Amount of Annual Grant (Sum of lines 2-19)	135,445
21	Amount of line 20 Related to LBP Activities	0
22	Amount of line 20 Related to Section 504 Compliance	0
23	Amount of line 20 Related to Security	0
24	Amount of line 20 Related to Energy Conservation Measures	0

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

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
HA-Wide	Operations	1406	135,445

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)
HA Wide	Within two years of initial draw	Within 3 years of initial draw

(2) Optional 5-Year Action Plan

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

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

b. If yes to question a, select one:

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

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)

Optional 5-Year Action Plan Tables			
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development
HA Wide	HA Wide	0	0
Description of Needed Physical Improvements or Management Improvements			Estimated Cost
			Planned Start Date (HA Fiscal Year)

Operations	135,445	2000
Operations	135,445	2001
Operations	135,445	2002
Operations	135,445	2003
Operations	135,445	2004
Total estimated cost over next 5 years	677,225	

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:

2. Development (project) number:

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

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

Yes No: c) Does the PHA plan to apply for a HOPE VI Revitalization grant in the Plan year?

If yes, list development name/s below:

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

If yes, list developments or activities below:

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

If yes, list developments or activities below:

8. Demolition and Disposition

[24 CFR Part 903.7 9 (h)]

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

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

2. Activity Description

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

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

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)] PHAs are not required to complete this section.

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

2. Activity Description

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

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

6. Number of units affected: 97
7. Coverage of action (select one)
- Part of the development
- Total development

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.)

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:	
1b. Development (project) number:	
2. What is the status of the required assessment?	<input type="checkbox"/> Assessment underway <input type="checkbox"/> Assessment results submitted to HUD <input type="checkbox"/> Assessment results approved by HUD (if marked, proceed to next question) <input type="checkbox"/> Other (explain below)
3. <input type="checkbox"/> Yes <input type="checkbox"/> No:	Is a Conversion Plan required? (If yes, go to block 4; if no, go to block 5.)

4. Status of Conversion Plan (select the statement that best describes the current status)

- Conversion Plan in development
- Conversion Plan submitted to HUD on: (DD/MM/YYYY)
- Conversion Plan approved by HUD on: (DD/MM/YYYY)
- Activities pursuant to HUD-approved Conversion Plan underway

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

- 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: 1b. Development (project) number:
2. Federal Program authority: <input type="checkbox"/> HOPE I <input type="checkbox"/> 5(h) <input type="checkbox"/> Turnkey III <input type="checkbox"/> Section 32 of the USHA of 1937 (effective 10/1/99)
3. Application status: (select one) <input type="checkbox"/> Approved; included in the PHA’s Homeownership Plan/Program <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application
4. Date Homeownership Plan/Program approved, submitted, or planned for submission: (DD/MM/YYYY)
5. Number of units affected: 6. Coverage of action: (select one) <input type="checkbox"/> Part of the development <input type="checkbox"/> Total development

B. Section 8 Tenant Based Assistance

1. Yes No: Does the PHA plan to administer a Section 8 Homeownership program pursuant to Section 8(y) of the U.S.H.A. of 1937, as implemented by 24 CFR part 982 ? (If “No”, skip to component 12;

if “yes”, describe each program using the table below (copy and complete questions for each program identified), unless the PHA is eligible to complete a streamlined submission due to high performer status. **High performing PHAs** may skip to component 12.)

2. Program Description:

a. Size of Program

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

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

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

b. PHA-established eligibility criteria

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

12. PHA Community Service and Self-sufficiency Programs

[24 CFR Part 903.7 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 has entered into a cooperative agreement with the TANF Agency, to share information and/or target supportive services (as contemplated by section 12(d)(7) of the Housing Act of 1937)?

If yes, what was the date that agreement was signed? 04/28/99

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 Policies

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

(select all that apply)

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

b. Economic and Social self-sufficiency programs

- Yes No: Does the PHA coordinate, promote or provide any programs to enhance the economic and social self-sufficiency of residents? (If “yes”, complete the following table; if “no” skip to sub-component 2, Family Self Sufficiency Programs. The position of the table may be altered to facilitate its use.)

Services and Programs

- 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 903.79 (m)]

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

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

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

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

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

- Safety and security survey of residents
- Analysis of crime statistics over time for crimes committed "in and around" public housing authority
- Analysis of cost trends over time for repair of vandalism and removal of graffiti
- Resident reports
- PHA employee reports

- Police reports
- Demonstrable, quantifiable success with previous or ongoing anticrime/anti drug programs
- Other (describe below)

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

Development wide

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

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

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

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

Development wide

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)

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: wa041c01)

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.

16. Fiscal Audit

[24 CFR Part 903.7 9 (p)]

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

17. PHA Asset Management

[24 CFR Part 903.7 9 (q)]

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

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

18. Other Information

[24 CFR Part 903.7 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) wa041g01
 - Provided below:
3. In what manner did the PHA address those comments? (select all that apply)
- Considered comments, but determined that no changes to the PHA Plan were necessary.
 - The PHA changed portions of the PHA Plan in response to comments
List changes below:
 - Other: (list below)

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

1. Yes No: Does the PHA meet the exemption criteria provided section 2(b)(2) of the U.S. Housing Act of 1937? (If no, continue to question 2; if yes, skip to sub-component C.)
2. Yes No: Was the resident who serves on the PHA Board elected by the residents? (If yes, continue to question 3; if no, skip to sub-component C.)

3. Description of Resident Election Process

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

- Candidates were nominated by resident and assisted family organizations
- Candidates could be nominated by any adult recipient of PHA assistance
- Self-nomination: Candidates registered with the PHA and requested a place on ballot
- Other: (describe)

b. Eligible candidates: (select one)

- Any recipient of PHA assistance
- Any head of household receiving PHA assistance
- Any adult recipient of PHA assistance
- Any adult member of a resident or assisted family organization
- Other (list)

c. Eligible voters: (select all that apply)

- All adult recipients of PHA assistance (public housing and section 8 tenant-based assistance)
- Representatives of all PHA resident and assisted family organizations
- Other (list)

C. Statement of Consistency with the Consolidated Plan

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

1. Consolidated Plan jurisdiction: City of Bellingham and State of Washington
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)
 - ❖ Continued preservation of low income housing by quality management, maintenance, and rehabilitation.
 - ❖ Continued commitment to apply for additional low income housing assistance as it becomes available.
 - ❖ Preference offered for those in the Transitional Housing Program
 - ❖ Fostering of supportive services to public housing residents
- Other: (list below)

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

The Consolidated Plan of the City of Bellingham commits the City to

- ❖ Fund acquisition of land to be utilized by other entities for the provision of low income rental housing (e.g., Housing Authority's Low Income Tax Credit Programs.)
- ❖ Provide local matching funds for other entities to acquire state funds from the Housing Finance Commission, Housing Trust Fund, or private financing services.
- ❖ Supportive services to prevent eviction from low income housing as part of a continuum of care program.

The Consolidate Plan of the State of Washington commits the State to providing:

- ❖ General purpose grants for housing, economic development, community facilities, public facilities, and comprehensive projects.
- ❖ Planning grants for conducting community assessments and work plans.
- ❖ Housing Enhancement Grants which provide flexible companion funding for competitive applications to the state Housing Trust Fund.

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.

wa041a01	Deconcentration Plan (ACOP - wa041b01 – Cap Fund in text)
wa041c01	Public Housing Drug Elimination Program
wa041d01	Definition of Substantial Change to the Annual Plan
wa041e01	Budget
wa041f01	Organization Chart
wa041g01	Resident Comments

Community Service Plan

The Bellingham Whatcom County Housing Authorities (BHA/WCHA) shall identify all adult family members who are not exempt from the community services requirement. BHA/WCHA has approximately 218 families under its public housing programs. Staff anticipates that approximately 15% - 25% of residents will be required to participate in community service

The BHA/WCHA shall notify all such family members who are apparently not exempt from the community service requirement and of the categories of individuals who are exempt from the requirement. The notification will provide the opportunity for family members to claim and explain an exempt status. The BHA/WCHA shall verify such claims. The notification will advise that failure to comply with the community service requirement will result in eligibility for continued occupancy at the time of any subsequent annual reexamination.

Community service includes performing work or duties in the public benefit that serve to improve the quality of life and/or enhance resident self-sufficiency, and/or increase the self-responsibility of the resident within the community. The BHA/WCHA will partner up with the Volunteer Center who will match public housing resident volunteers with available volunteer opportunities. The Whatcom Volunteer Center will track and monitor the public housing resident volunteers and will notify BHA/WCHA of those who fail to meet their 8 hour community service obligation. BHA/WCHA will identify and refer those families required to perform community service work. The Whatcom Volunteer Center will screen and match residents with the needs of community organizations. BHA/WCHA will verify family compliance on an annual basis. During the annual recertification process (and no later than 45 days before the expiration of lease term) Housing Authority will require that the Whatcom Volunteer Center provide verification that the family has met their obligation under the community service requirement.

The BHA/WCHA will offer the family member(s) the opportunity to enter into an agreement prior to the anniversary of the lease. The agreement shall state that the family member(s) agrees to enter into an economic self-sufficiency program or agrees to enter into an economic self-sufficiency program or agrees to contribute to community service for as many hours as needed to comply with the requirement over the past 12-month period. The cure shall occur over the 12-month period beginning with the date of the agreement and the resident shall at the same time stay current with that year's community service requirement.

If any applicable family member does not accept the terms of the agreement, does not fulfill their obligation to participate in an economic self-sufficiency program, or falls behind in their obligation under the agreement to perform community service by more than three (3) hours after three (3) months, the BHA/WCHA shall take action to terminate the lease.

ACOP TABLE OF CONTENTS

1.0	FAIR HOUSING.....	2
2.0	REASONABLE ACCOMMODATION	2
2.1	COMMUNICATION.....	3
2.2	QUESTIONS TO ASK IN GRANTING THE ACCOMMODATION	3
3.0	SERVICES FOR NON-ENGLISH SPEAKING APPLICANTS AND RESIDENTS	4
4.0	FAMILY OUTREACH	5
5.0	RIGHT TO PRIVACY.....	5
6.0	REQUIRED POSTINGS	5
7.0	TAKING APPLICATIONS.....	6
8.0	ELIGIBILITY FOR ADMISSION.....	7
8.1	INTRODUCTION.....	7
8.2	ELIGIBILITY CRITERIA	8
8.3	SUITABILITY	12
8.4	GROUND FOR DENIAL	13
8.5	INFORMAL REVIEW	15
9.0	MANAGING THE WAITING LIST	16
9.1	OPENING AND CLOSING THE WAITING LIST	16
9.2	ORGANIZATION OF THE WAITING LIST	16
9.3	FAMILIES NEARING THE TOP OF THE WAITING LIST	17
9.4	PURGING THE WAITING LIST.....	17
9.5	REMOVAL OF APPLICANTS FROM THE WAITING LIST	17
9.6	MISSED APPOINTMENTS	17
9.7	NOTIFICATION OF NEGATIVE ACTIONS.....	18
10.0	TENANT SELECTION AND ASSIGNMENT PLAN.....	18
10.1	PREFERENCES.....	18
10.2	ASSIGNMENT OF BEDROOM SIZES	19
10.3	SELECTION FROM THE WAITING LIST	22
10.4	DECONCENTRATION POLICY.....	22
10.5	DECONCENTRATION INCENTIVES	23
10.6	OFFER OF A UNIT	23
10.7	REJECTION OF UNIT.....	24
10.8	ACCEPTANCE OF UNIT.....	24
11.0	INCOME, EXCLUSIONS FROM INCOME, AND DEDUCTIONS FROM INCOME..	26
11.1	INCOME.....	26

11.2	ANNUAL INCOME.....	28
11.3	DEDUCTIONS FROM ANNUAL INCOME.....	32
12.0	VERIFICATION	33
12.1	ACCEPTABLE METHODS OF VERIFICATION	33
12.2	TYPES OF VERIFICATION.....	34
12.3	VERIFICATION OF CITIZENSHIP OR ELIGIBLE NONCITIZEN STATUS.....	38
12.4	VERIFICATION OF SOCIAL SECURITY NUMBERS.....	39
12.5	TIMING OF VERIFICATION	40
12.6	FREQUENCY OF OBTAINING VERIFICATION	40
13.0	DETERMINATION OF TOTAL TENANT PAYMENT AND TENANT RENT	41
13.1	FAMILY CHOICE.....	41
13.2	THE FORMULA METHOD.....	41
13.3	MINIMUM RENT.....	42
13.4	THE FLAT RENT.....	43
13.5	CEILING RENT.....	43
13.6	RENT FOR FAMILIES UNDER THE NONCITIZEN RULE.....	43
13.7	UTILITY ALLOWANCE.....	44
13.8	PAYING RENT	45
14.0	CONTINUED OCCUPANCY AND COMMUNITY SERVICE	45
14.1	GENERAL.....	45
14.2	EXEMPTIONS.....	46
14.3	NOTIFICATION OF THE REQUIREMENT.....	46
14.4	VOLUNTEER OPPORTUNITIES.....	47
14.5	THE PROCESS.....	47
14.6	NOTIFICATION OF NON-COMPLIANCE WITH COMMUNITY SERVICE REQUIREMENT.....	48
14.7	OPPORTUNITY FOR CURE.....	48
15.0	RECERTIFICATIONS	48
15.1	GENERAL.....	49
15.2	MISSED APPOINTMENTS.....	49
15.3	FLAT RENTS	49
15.4	THE FORMULA METHOD.....	50
15.5	EFFECTIVE DATE OF RENT CHANGES FOR ANNUAL REEXAMINATIONS	51
15.6	INTERIM REEXAMINATIONS.....	51
15.7	SPECIAL REEXAMINATIONS.....	52
15.8	EFFECTIVE DATE OF RENT CHANGES DUE TO INTERIM OR SPECIAL REEXAMINATIONS.....	52
16.0	UNIT TRANSFERS.....	53
16.1	INTRODUCTION.....	53
16.2	GENERAL STATEMENT	53
16.3	RANK ORDER OF TRANSFER LIST	53
16.4	MANDATORY TRANSFERS.....	54

16.5	NON-MANDATORY TRANSFERS	54
16.6	EMERGENCY TRANSFERS	54
16.7	INCENTIVE TRANSFERS	55
16.8	MOVING COSTS.....	55
16.9	SECURITY DEPOSITS.....	55
16.10	RIGHT OF THE BHA/WCHA IN TRANSFER POLICY	55
17.0	INSPECTIONS.....	55
17.1	MOVE-IN INSPECTIONS.....	56
17.2	ANNUAL INSPECTIONS	56
17.3	PREVENTATIVE MAINTENANCE INSPECTIONS.....	56
17.4	SPECIAL INSPECTIONS.....	56
17.5	HOUSEKEEPING INSPECTIONS.....	56
17.6	NOTICE OF INSPECTION.....	56
17.7	EMERGENCY INSPECTIONS	57
17.8	PRE-MOVE-OUT INSPECTIONS.....	57
17.9	MOVE-OUT INSPECTIONS	57
18.0	PET POLICY.....	57
18.1	ANIMALS THAT ASSIST PERSONS WITH DISABILITIES	58
18.2	MANAGEMENT APPROVAL OF PETS.....	58
18.3	REGISTRATION OF PETS.....	58
18.4	REFUSAL TO REGISTER PETS.....	58
18.5	STANDARDS FOR PETS.....	59
18.6	PETS TEMPORARILY ON THE PREMISES.....	60
18.7	ADDITIONAL FEES AND DEPOSITS FOR PETS.....	61
18.8	ALTERATIONS TO UNIT.....	61
18.9	PET WASTE REMOVAL CHARGE	61
18.10	PET AREA RESTRICTIONS.....	62
18.11	NOISE.....	62
18.12	CLEANLINESS REQUIREMENTS	62
18.13	REMOVAL OF WASTE FROM OTHER LOCATIONS.....	63
18.14	PET CARE.....	63
18.15	RESPONSIBLE PARTIES.....	63
18.16	INSPECTIONS.....	63
18.17	PET RULE VIOLATION NOTICE.....	64
18.18	NOTICE FOR PET REMOVAL.....	64
18.19	TERMINATION OF TENANCY	65
18.20	PET REMOVAL.....	65
18.21	EMERGENCIES.....	65
19.0	REPAYMENT AGREEMENTS.....	65
20.0	TERMINATION	66
20.1	TERMINATION BY TENANT	66
20.2	TERMINATION BY THE HOUSING AUTHORITY	66
20.3	ABANDONMENT.....	67

20.4 RETURN OF SECURITY DEPOSIT.....	68
GLOSSARY	69
ACRONYMS	79
APPENDIX I: ADDENDUM FOR PROGRAM INTEGRITY	80

ADMISSIONS AND CONTINUED OCCUPANCY POLICY

This Admissions and Continued Occupancy Policy defines the BHA/WCHA's policies for the operation for the Public Housing Program, incorporating Federal, State and local law. If there is any conflict between this policy and laws or regulations, the laws and regulations will prevail.

1.0 FAIR HOUSING

It is the policy of the Bellingham Housing Authority/Whatcom County Housing Authority (BHA/WCHA) to fully comply with all Federal, State and local nondiscrimination laws; the Americans with Disabilities Act; and the U. S. Department of Housing and Urban Development regulations governing Fair Housing and Equal Opportunity.

No person shall, on the grounds of race, color, sex, religion, national or ethnic origin, familial status, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under the BHA/WCHA's programs.

To further its commitment to full compliance with applicable Civil Rights laws, the BHA/WCHA will provide Federal/State/local information to applicants/tenants of the Public Housing Program regarding discrimination and any recourse available to them if they believe they may be victims of discrimination. Such information will be made available with the application, and all applicable Fair Housing Information and Discrimination Complaint Forms will be made available at the BHA/WCHA office. In addition, all written information and advertisements will contain the appropriate Equal Opportunity language and logo.

The BHA/WCHA will assist any family that believes they have suffered illegal discrimination by providing them copies of the appropriate housing discrimination forms. The BHA/WCHA will also assist them in completing the forms if requested, and will provide them with the address of the nearest HUD office of Fair Housing and Equal Opportunity.

2.0 REASONABLE ACCOMMODATION

Sometimes people with disabilities may need a reasonable accommodation in order to take full advantage of the BHA/WCHA housing programs and related services. When such accommodations are granted, they do not confer special treatment or advantage for the person with a disability; rather, they make the program accessible to them in a way that would otherwise not be possible due to their disability. This policy clarifies how people can request accommodations and the guidelines the BHA/WCHA will follow in determining whether it is reasonable to provide a requested accommodation. Because disabilities are not always

ACOP

Bellingham Housing Authority
Whatcom County Housing Authority

apparent, the BHA/WCHA will ensure that all applicants/tenants are aware of the opportunity to request reasonable accommodations.

2.1 COMMUNICATION

Notifications of reexamination, inspection, appointment, or eviction will include information about requesting a reasonable accommodation. Any notification requesting action by the tenant will include information about requesting a reasonable accommodation.

All decisions granting or denying requests for reasonable accommodations will be in writing.

2.2 QUESTIONS TO ASK IN GRANTING THE ACCOMMODATION

- A. Is the requestor a person with disabilities? For this purpose the definition of person with disabilities is different than the definition used for admission. The Fair Housing definition used for this purpose is:

A person with a physical or mental impairment that substantially limits one or more major life activities, has a record of such an impairment, or is regarded as having such an impairment. (The disability may not be apparent to others, i.e., a heart condition).

If the disability is apparent or already documented, the answer to this question is yes. It is possible that the disability for which the accommodation is being requested is a disability other than the apparent disability. If the disability is not apparent or documented, the BHA/WCHA will obtain verification that the person is a person with a disability.

- B. Is the requested accommodation related to the disability? If it is apparent that the request is related to the apparent or documented disability, the answer to this question is yes. If it is not apparent, the BHA/WCHA will obtain documentation that the requested accommodation is needed due to the disability. The BHA/WCHA will not inquire as to the nature of the disability.

- C. Is the requested accommodation reasonable? In order to be determined reasonable, the accommodation must meet two criteria:

7. 1. Would the accommodation constitute a fundamental alteration? The BHA/WCHA's business is housing. If the request would alter the fundamental business that the BHA/WCHA conducts, that would not be reasonable. For

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

instance, the BHA/WCHA would deny a request to have the BHA/WCHA do grocery shopping for a person with disabilities.

8.

9. 2. Would the requested accommodation create an undue financial hardship or administrative burden? Frequently the requested accommodation costs little or nothing. If the cost would be an undue burden, the BHA/WCHA may request a meeting with the individual to investigate and consider equally effective alternatives.

- D. Generally the individual knows best what it is they need; however, the BHA/WCHA retains the right to be shown how the requested accommodation enables the individual to access or use the BHA/WCHA's programs or services.

If more than one accommodation is equally effective in providing access to the BHA/WCHA's programs and services, the BHA/WCHA retains the right to select the most efficient or economic choice.

7. The cost necessary to carry out approved requests, including requests for physical modifications, will be borne by the BHA/WCHA if there is no one else willing to pay for the modifications. If another party pays for the modification, the BHA/WCHA will seek to have the same entity pay for any restoration costs.
7. If the tenant requests as a reasonable accommodation that they be permitted to make physical modifications at their own expense, the BHA/WCHA will generally approve such request if it does not violate codes or affect the structural integrity of the unit.

Any request for an accommodation that would enable a tenant to materially violate essential lease terms will not be approved, i.e. allowing nonpayment of rent, destruction of property, disturbing the peaceful enjoyment of others, etc.

3.0 SERVICES FOR NON-ENGLISH SPEAKING APPLICANTS AND RESIDENTS

The BHA/WCHA will endeavor to have bilingual staff or access to people who speak languages other than English in order to assist non-English speaking families. Current staff resources permit assistance to non-English speaking families in Spanish and Russian and will consider providing translation of housing authority documents into Spanish and Russian upon request by an applicant or tenant.

In determining whether it is feasible to translate documents into other languages, the housing authority will consider the following factors:

Estimated cost to the housing authority per client of translation of English written documents into other languages.

Evaluation of the need for translation by the bi-lingual staff and by agencies that work with the non-English speaking clients.

The availability of local organizations to provide translation services to non-English speaking families.

4.0 FAMILY OUTREACH

The BHA/WCHA will publicize the availability and nature of the Public Housing Program for extremely low-income, very low and low-income families in a newspaper of general circulation, minority media, and by other suitable means.

To reach people who cannot or do not read the newspapers, the BHA/WCHA will distribute fact sheets to the broadcasting media and initiate personal contacts with members of the news media and community service personnel. The BHA/WCHA will also try to utilize public service announcements.

The BHA/WCHA will communicate the status of housing availability to other service providers in the community and inform them of housing eligibility factors and guidelines so they can make proper referrals for the Public Housing Program.

5.0 RIGHT TO PRIVACY

All adult members of both applicant and tenant households are required to sign HUD Form 9886, Authorization for Release of Information and Privacy Act Notice. The Authorization for Release of Information and Privacy Act Notice states how family information will be released and includes the Federal Privacy Act Statement.

Any request for applicant or tenant information will not be released unless there is a signed release of information request from the applicant or tenant.

6.0 REQUIRED POSTINGS

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

In each of its offices, the BHA/WCHA will post, in a conspicuous place and at a height easily read by all persons including persons with mobility disabilities, the following information:

- A. Statement of Policies and Procedures governing Admission and Continued Occupancy
- B. Notice of the status of the waiting list (opened or closed)
- C. A listing of all the developments by name, address, number of units, units designed with special accommodations, address of all project offices, office hours, telephone numbers, TDD numbers, and Resident Facilities and operation hours
- D. Income Limits for Admission
- E. Current Schedule of Routine Maintenance Charges
- F. Dwelling Lease
- G. Grievance Procedure
- H. Fair Housing Poster
- I. Equal Opportunity in Employment Poster
- J. Any current BHA/WCHA Notices

7.0 TAKING APPLICATIONS

Families wishing to apply for the Public Housing Program will be required to complete an application for housing assistance. Applications will be accepted during regular business hours at:

208 Unity Street, Lower Level, Bellingham, WA

Applications are taken to compile a waiting list. Due to the demand for housing in the BHA/WCHA jurisdiction, the BHA/WCHA may take applications on an open enrollment basis, depending on the length of the waiting list.

Completed applications will be accepted for all applicants and the BHA/WCHA will verify the information.

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

Applications may be made in during regular business hours. Applications will be mailed to interested families upon request.

The completed application will be dated and time stamped upon its return to the BHA/WCHA.

Persons with disabilities who require a reasonable accommodation in completing an application may call the BHA/WCHA to make special arrangements. A Telecommunication Device for the Deaf (TDD) is available for the deaf. The TDD telephone number is (360) 676-2140.

The application process will involve two phases. The first phase is the initial application for housing assistance or the pre-application. The pre-application requires the family to provide limited basic information establishing any preferences to which they may be entitled. This first phase results in the family's placement on the waiting list.

Upon receipt of the family's pre-application, the BHA/WCHA will make a preliminary determination of eligibility. The BHA/WCHA will notify the family in writing of the date and time of placement on the waiting list, and the approximate wait before housing may be offered. If the BHA/WCHA determines the family to be ineligible, the notice will state the reasons therefore and will offer the family the opportunity of an informal review of the determination.

The applicant may at any time report changes in their applicant status including changes in family composition, income, or preference factors. The BHA/WCHA will annotate the applicant's file and will update their place on the waiting list. Confirmation of the changes will be confirmed with the family in writing.

The second phase is the final determination of eligibility, referred to as the full application. The full application takes place when the family nears the top of the waiting list. The BHA/WCHA will ensure that verification of all preferences, eligibility, suitability and selection factors are current in order to determine the family's final eligibility for admission into the Public Housing Program.

8.0 ELIGIBILITY FOR ADMISSION

8.1 INTRODUCTION

- 1.
2. There are five eligibility requirements for admission to public housing: qualifies as a family, has an income within the income limits, meets citizenship/eligible immigrant criteria, provides documentation of Social Security numbers, and signs consent authorization documents. In addition to the eligibility criteria, families must also meet the BHA/WCHA screening criteria in order to be admitted to public housing.

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

3.
8.2 **ELIGIBILITY CRITERIA**

A. Family status

1. **Eligible Alien.** An alien who is a resident of the United States and who meets at least one (1) of the criteria as defined in 24 CFR 812.2.
2. **Eligible Family.** A Family whose annual income meets the income limits of extremely-low, very-low, and low income as defined as below 30%, between 30% and 50%, and between 50% and 80% of area median income as defined by the Department of Housing and Urban Development.
3. **Family.** A Family can consist of any of the following:
 - a. Single persons, with no children, who are pregnant as verified by a licensed physician.
 - 1) If the pregnancy is terminated prior to admission, the applicant is no longer considered a Family.
 - 2) If the pregnancy is terminated after admission, the single person would still be eligible as the remaining member of a tenant family.
 - b. Single persons, with no children, who are in the process of obtaining legal custody of a person under eighteen (18) years of age.
 - 1) There must be reasonable likelihood of the success of obtaining custody at the time of an offer of housing. If there is not a “reasonable likelihood” of success, but the applicant is still attempting to obtain custody, the applicant would not be housed, but could maintain the position on the waiting list until such time as custody is either secured or denied.
 - 2) If custody is denied after admission, the single person would still be eligible as the remaining member of a tenant family.

- c. A single person who otherwise qualified, provided that the HUD Field Office Director has authorized such admissions due to excessive vacancies and a shortage of applicants, other than single persons.
- d. A single person displaced by government action or as a result of a disaster declared or otherwise formally recognized under Federal disaster relief laws.
- e. A single person who is the remaining member of a tenant family.
- f. An Elderly Family as defined in this section.
- g. Two (2) or more persons related by blood, marriage, or operation of law, with the following clarifications:
 - 1) At least one family member must be a dependent child under the age of 18.
 - 2) There can also be other unrelated persons living in the household, such as foster children, if it is determined that the unit will not be overcrowded.
 - 3) Persons residing with a Family to permit the employment of a sole wage-earner, or solely because the person is essential to the care of a family member, shall not be considered a family member when determining eligibility at admission or for continued occupancy.
 - 4) Children are considered family members if they either currently reside, or it can be reasonably anticipated that they will reside, with the Family **on a regular basis throughout the year.**
 - 5) 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.

4. **Full-time Student.** A person who is enrolled in a certified educational institution and is considered a full-time student under the standards and practices of the institution attended.
5. **Handicapped Assistance Expenses.** Reasonable expenses that are anticipated, during the period for which Annual Income is computed, for attendant care and auxiliary apparatus for a Handicapped or Disabled Family Member, and that are necessary to enable a Family Member
6. **Handicapped Person.** A person having physical or mental impairment (1) which is expected to be of long-continued and indefinite duration; (2) which substantially impedes that person's ability to live independently, and (3) which is of such nature that the ability to live independently would be substantially improved by more suitable housing conditions such as those provided by the Program.
7. **Head of Family.** That member of the Family who is actually looked to, and held accountable for, the Family's needs and who is at least 18 years of age.
8. **Homeless.** Lacking a fixed, regular, adequate nighttime residence OR have a primary nighttime residence that is a supervised public/private shelter providing temporary accommodations, or an institution providing temporary residence for individuals intended to be institutionalized, or a public/private place not ordinarily used as a sleeping accommodation. Does not include any individual imprisoned or detained pursuant to state law or an act of Congress.

7. B. Income eligibility

1. 1. Income limits apply only at admission and are not applicable for continued occupancy.
1. 2. A family may not be admitted to the public housing program from another assisted housing program (e.g., tenant-based Section 8) or from a public housing program operated by another housing authority without meeting the income requirements of the BHA/WCHA.
2. 3. If the BHA/WCHA acquires a property for federal public housing purposes, the families living there must have incomes within the low-income limit

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

in order to be eligible to remain as public housing tenants.

1. 4. Income limit restrictions do not apply to families transferring within our Public Housing Program.

7. C. Citizenship/Eligibility Status

1. To be eligible each member of the family must be a citizen, national, or a non-citizen who has eligible immigration status under one of the categories set forth in Section 214 of the Housing and Community Development Act of 1980 (see 42 U.S.C. 1436a(a)).
2. Family eligibility for assistance.
 1. a. A family shall not be eligible for assistance unless every member of the family residing in the unit is determined to have eligible status, with the exception noted below.
 - b. Despite the ineligibility of one or more family members, a mixed family may be eligible for one of three types of assistance. (See Section 13.6 for calculating rents under the non-citizen rule)
 - c. A family without any eligible members and receiving assistance on June 19, 1995 may be eligible for temporary deferral of termination of assistance.

7. D. Social Security Number Documentation

To be eligible, all family members 6 years of age and older must provide a Social Security number or certify that they do not have one.

7. E. Signing Consent Forms

3. In order to be eligible, each member of the family who is at least 18 years of age, and each family head and spouse regardless of age, shall sign one or more consent forms.
2. The consent form must contain, at a minimum, the following:

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

- a. A provision authorizing HUD or the BHA/WCHA to obtain from State Wage Information Collection Agencies (SWICAs) any information or materials necessary to complete or verify the application for participation or for eligibility for continued occupancy; and
- b. A provision authorizing HUD or the BHA/WCHA to verify with previous or current employers income information pertinent to the family's eligibility for or level of assistance;
- c. A provision authorizing HUD to request income information from the IRS and the SSA for the sole purpose of verifying income information pertinent to the family's eligibility or level of benefits; and
- d. A statement that the authorization to release the information requested by the consent form expires 15 months after the date the consent form is signed.

8.3 SUITABILITY

7.

- 8. A. Applicant families will be evaluated to determine whether, based on their recent behavior, such behavior could reasonably be expected to result in noncompliance with the public housing lease. The BHA/WCHA will look at past conduct as an indicator of future conduct. Emphasis will be placed on whether a family's admission could reasonably be expected to have a detrimental effect on the development environment, other tenants, BHA/WCHA employees, or other people residing in the immediate vicinity of the property. Otherwise eligible families will be denied admission if they fail to meet the suitability criteria.

- 7. B. The BHA/WCHA will consider objective and reasonable aspects of the family's background, including the following:

4. 1. History of meeting financial obligations, especially rent;

5.

- 6. 2. Ability to maintain (or with assistance would have the ability to maintain) their housing in a decent and safe condition based on living or housekeeping habits and whether such habits could adversely affect the health, safety, or welfare of other tenants;

- 4. 3. History of criminal activity by any household member involving crimes of physical violence against persons or property and any other criminal activity including drug-related criminal activity that would adversely affect the health,

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

safety, or well being of other tenants or staff or cause damage to the property;

4. 3. History of disturbing neighbors or destruction of property;
4. 4. Having committed fraud in connection with any Federal housing assistance program, including the intentional misrepresentation of information related to their housing application or benefits derived there from; and
4. 5. History of abusing alcohol in a way that may interfere with the health, safety, or right to peaceful enjoyment by others.

C. The BHA/WCHA will ask applicants to provide information demonstrating their ability to comply with the essential elements of the lease. The BHA/WCHA will verify the information provided. Such verification may include but may not be limited to the following:

4. 1. A credit check of the head, spouse and co-head;
5. 2. A rental history check of all adult family members;
6. 3. A criminal background check on all adult household members, including live-in aides. This check will be made through State or local law enforcement or court records in those cases where the household member has lived in the local jurisdiction for the last three years. Where the individual has lived outside the local area, the BHA/WCHA may contact law enforcement agencies where the individual had lived or request a check through the FBI's National Crime Information Center (NCIC);
7. 4. A home visit. The home visit provides the opportunity for the family to demonstrate their ability to maintain their home in a safe and sanitary manner. This inspection considers cleanliness and care of rooms, appliances, and appurtenances. The inspection may also consider any evidence of criminal activity; and
8. 5. A check of the State's lifetime sex offender registration program for each adult household member, including live-in aides. No individual registered with this program will be admitted to public housing.
- 9.
- 10.
- 11.
- 12.

8.4 GROUND S FOR DENIAL

The BHA/WCHA is not required or obligated to assist applicants who:

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

- A. Do not meet any one or more of the eligibility criteria;
- B. Do not supply information or documentation required by the application process;
- C. Have failed to respond to a written request for information or a request to declare their continued interest in the program;
- D. Have a history of not meeting financial obligations, especially rent;
- E. Do not have the ability to maintain (with assistance) their housing in a decent and safe condition where such habits could adversely affect the health, safety, or welfare of other tenants;
- F. Have a history of criminal activity by any household member involving crimes of physical violence against persons or property and any other criminal activity including drug-related criminal activity that would adversely affect the health, safety, or well being of other tenants or staff or cause damage to the property;
- G. Have a history of disturbing neighbors or destruction of property;
- H. Currently owes rent or other amounts to any housing authority in connection with their public housing or Section 8 programs;
- I. Have committed fraud, bribery or any other corruption in connection with any Federal housing assistance program, including the intentional misrepresentation of information related to their housing application or benefits derived there from;
- J. Were evicted from assisted housing within three years of the projected date of admission because of drug-related criminal activity involving the personal use or possession for personal use;
- K. Were evicted from assisted housing within five years of the projected date of admission because of drug-related criminal activity involving the illegal manufacture, sale, distribution, or possession with the intent to manufacture, sell, distribute a controlled substance as defined in Section 102 of the Controlled Substances Act, 21 U.S.C. 802;
- L. Are illegally using a controlled substance or are abusing alcohol in a way that may interfere with the health, safety, or right to peaceful enjoyment of the premises by other residents. The BHA/WCHA may waive this requirement if:

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

1. The person demonstrates to the BHA/WCHA's satisfaction that the person is no longer engaging in drug-related criminal activity or abuse of alcohol;
 2. Has successfully completed a supervised drug or alcohol rehabilitation program;
 3. Has otherwise been rehabilitated successfully; or
 4. Is participating in a supervised drug or alcohol rehabilitation program.
- M. Have engaged in or threatened abusive or violent behavior towards any BHA/WCHA staff or residents;
- N. Have a household member who has ever been evicted from public housing;
- O. Have a family household member who has been terminated under the certificate or voucher program;
- P. **Denied for Life:** If any family member has been convicted of manufacturing or producing methamphetamine (speed) in a public housing development or in a Section 8 assisted property;
- Q. **Denied for Life:** Has a lifetime registration under a State sex offender registration program.

8.5 *INFORMAL REVIEW*

- A. If the BHA/WCHA determines that an applicant does not meet the criteria for receiving public housing assistance, the BHA/WCHA will promptly provide the applicant with written notice of the determination. The notice must contain a brief statement of the reason(s) for the decision and state that the applicant may request an informal review of the decision within 10 business days of the denial. The BHA/WCHA will describe how to obtain the informal review.

The informal review may be conducted by any person designated by the BHA/WCHA, other than a person who made or approved the decision under review or subordinate of this person. The applicant must be given the opportunity to present written or oral objections to the BHA/WCHA's decision. The BHA/WCHA must notify the applicant of the final decision within 14 calendar days after the informal review, including a brief statement of the reasons for the final decision.

- B. The participant family may request that the BHA/WCHA provide for an Informal Hearing after the family has notification of an INS decision on their citizenship status on appeal, or in lieu of request of appeal to the INS. This request must be made by the participant family within 30 days of receipt of the Notice of Denial or Termination of Assistance, or within 30 days of receipt of the INS appeal decision.

For the participant families, the Informal Hearing Process above will be utilized with the exception that the participant family will have up to 30 days of receipt of the Notice of Denial or Termination of Assistance, or of the INS appeal decision.

9.0 MANAGING THE WAITING LIST

9.1 OPENING AND CLOSING THE WAITING LIST

Opening of the waiting list will be announced with a public notice stating that applications for public housing will again be accepted. The public notice will state where, when, and how to apply. The notice will be published in a local newspaper of general circulation and also by any available minority media. The public notice will state any limitations to who may apply.

The notice will state that applicants already on waiting lists for other housing programs must apply separately for this program and such applicants will not lose their place on other waiting lists when they apply for public housing. The notice will include the Fair Housing logo and slogan and will be in compliance with Fair Housing requirements.

Closing of the waiting list will also be announced with a public notice. The public notice will state the date the waiting list will be closed and for what bedroom sizes. The public notice will be published in a local newspaper of general circulation and also by any available minority media.

9.2 ORGANIZATION OF THE WAITING LIST

The waiting list will be maintained in accordance with the following guidelines:

- A. The application will be a permanent file;
- B. All applications will be maintained in order of bedroom size, preference, and then in order of date and time of application; and
- C. Any contacts between the BHA/WCHA and the applicant will be documented in the applicant file.

9.3 FAMILIES NEARING THE TOP OF THE WAITING LIST

When a family nears the top of the waiting list, the family will be invited to an interview and the verification process will begin. It is at this point in time that the family's waiting list preference will be verified. If the family no longer qualifies to be near the top of the list, the family's name will be returned to the appropriate spot on the waiting list. The BHA/WCHA must notify the family in writing of this determination and give the family the opportunity for an informal review.

Once the preference has been verified, the family will complete a full application, present Social Security number information, citizenship/eligible immigrant information, and sign the Consent for Release of Information forms.

9.4 PURGING THE WAITING LIST

The BHA/WCHA will update and purge its waiting list at least annually to ensure that the pool of applicants reasonably represents the interested families for whom the BHA/WCHA has current information, i.e. applicant's address, family composition, income category, and preferences.

9.5 REMOVAL OF APPLICANTS FROM THE WAITING LIST

The BHA/WCHA will not remove an applicant's name from the waiting list unless:

- A. The applicant requests in writing that the name be removed;
- B. The applicant fails to respond to a written request for information or a request to declare their continued interest in the program; or
- C. The applicant does not meet either the eligibility or suitability criteria for the program.

9.6 MISSED APPOINTMENTS

All applicants who fail to keep a scheduled appointment with the BHA/WCHA will be sent a notice of termination of the process for eligibility.

The BHA/WCHA will allow the family to reschedule for good cause. Generally, no more than one opportunity will be given to reschedule without good cause, and no more than two opportunities will be given for good cause. When good cause exists for missing an appointment, the BHA/WCHA will work closely with the family to find a more suitable time. Applicants will be offered the right to an informal review before being removed from the waiting list.

9.7 NOTIFICATION OF NEGATIVE ACTIONS

Any applicant whose name is being removed from the waiting list will be notified by the BHA/WCHA, in writing, that they have ten (10) calendar days from the date of the written correspondence to present mitigating circumstances or request an informal review. The letter will also indicate that their name will be removed from the waiting list if they fail to respond within the timeframe specified. The BHA/WCHA system of removing applicant names from the waiting list will not violate the rights of persons with disabilities. If an applicant claims that their failure to respond to a request for information or updates was caused by a disability, the BHA/WCHA will verify that there is in fact a disability and the disability caused the failure to respond, and provide a reasonable accommodation. An example of a reasonable accommodation would be to reinstate the applicant on the waiting list based on the date and time of the original application.

10.0 TENANT SELECTION AND ASSIGNMENT PLAN

10.1 PREFERENCES

The BHA/WCHA will select families based on the following preferences within each bedroom size category:

- A. Families who have been homeless and have either completed, or are a participant in good standing of, a transitional housing program approved by the Executive Director. However, no more than 30 families annually of those applicants who actually receive assistance in any calendar year may be assisted through this local preference. Transitional housing providers may be contracted by the Executive Director for specific numbers of slots available.
- B. The housing authority has a preference for up to 25 families annually who have been steadily employed, have a training service plan in place, or have successfully completed training activities through an employment training program for more than 60 consecutive days. Any such training programs must be approved by the Executive Director.
- C. For elderly/disabled units only, up to 60 applicants who are referred in writing by the Northwest Regional Council and who are receiving one or more services and/or ongoing case management from an agency approved by the Executive Director. At the discretion of the Executive Direction, an additional 15 applicants may be assisted under this preference.

All preferences are weighted equally.

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

The date and time of application will be noted and utilized to determine the sequence within the above prescribed preferences.

Notwithstanding the above, families who are elderly, disabled, or displaced will be offered housing before other single persons.

Buildings Designed for the Elderly and Disabled: Preference will be given to elderly and disabled families. If there are no elderly or disabled families on the list, preference will then be given to near-elderly families. If there are no near-elderly families on the waiting list, units will be offered to families who qualify for the appropriate bedroom size using these priorities. All such families will be selected from the waiting list using the preferences as outlined above.

Accessible Units: Accessible units will be first offered to families who may benefit from the accessible features. Applicants for these units will be selected utilizing the same preference system as outlined above. If there are no applicants who would benefit from the accessible features, the units will be offered to other applicants in the order that their names come to the top of the waiting list. Such applicants, however, must sign a release form stating they will accept a transfer (at their own expense) if, at a future time, a family requiring an accessible feature applies. Any family required to transfer will be given a 30-day notice.

10.2 ASSIGNMENT OF BEDROOM SIZES

The following guidelines will determine each family’s unit size without overcrowding or over-housing:

Number of Bedrooms	Number of Persons	
	Minimum	Maximum
0	1	2
1	1	3
2	2	5
3	3	7
4	4	At BHA/WCHA discretion

The BHA/WCHA does not determine who share a bedroom/sleeping room, but there must be at least one person per bedroom. The housing authority's Occupancy Guideline standards for determining unit size shall be applied in a manner consistent with Fair Housing guidelines.

For occupancy standards, an adult is a person 18 years or older or an emancipated minor.

All guidelines in this section relate to the number of bedrooms in the unit. Dwelling units will be assigned that use these principles:

Generally, the housing authority will assign one bedroom to two people within these guidelines.

Adults of different generations, persons of the opposite sex (other than spouses), and unrelated adults will not be required to share a bedroom.

Separate bedrooms should be allocated for persons of the opposite sex (other than adults who have a spousal relationship and children under 6).

Foster children will be included in determining unit size only if they will be in the unit for more than 6 months.

Live-in attendants will generally be provided a separate bedroom. No additional bedrooms are provided for the attendant's family.

Space may be provided for a child who is away at school but who lives with the family during school recesses.

Space will not be provided for a family member who will be absent most of the time, such as a member who is away in the military.

Exceptions to normal bedroom size standards:

The BHA/WCHA will grant exceptions from the guidelines in cases where it is the family's request or the BHA/WCHA determines the exceptions are justified by the relationship, age, sex, health or disability of family members, or other individual circumstances, and there is a vacant unit available. If an applicant requests to be listed on a smaller or larger bedroom size waiting list, the following guidelines will apply:

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

Applicants may request to be placed on the waiting list for a unit size smaller than designated by the occupancy guidelines, (as long as the unit is not overcrowded according to local codes). The family must agree not to request a transfer until their family composition changes.

At the BHA/WCHA's discretion the family may be offered a unit smaller than the preferred unit size, based on the BHA/WCHA's occupancy standards, if in doing so the family has an opportunity to be housed earlier, or live in a preferred project.

The BHA/WCHA may offer a family a unit that is larger than required by the BHA/WCHA's occupancy standards, if the waiting list is short of families large enough to fill the vacancy[or the BHA/WCHA determines that the common area for the project is insufficient for accommodating any additional large families.

In all cases, where the family requests an exception to the general occupancy standards, the BHA/WCHA will evaluate the relationship and ages of all family members and the overall size of the unit.

The family may request to be placed on a larger bedroom size waiting list than indicated by the BHA/WCHA's occupancy guidelines. The request must explain the need or justification for a larger bedroom size, and must be verified by the BHA/WCHA before the family is placed on the larger bedroom size list. The HA will consider these requests:

Person with Disability

The HA will grant an exception upon request as a reasonable accommodation for persons with disabilities if the need is appropriately verified and meets requirements in Chapter 1, E. Service and Accommodations Policy.

Other Circumstances

Circumstances may dictate a larger size than the occupancy standards permit when:

Persons cannot share a bedroom because of a need for medical equipment due to its size and/or function. Requests for a larger bedroom due to medical equipment must be verified by a doctor.

Requests based on health related reasons must be verified by a medical professional.

The BHA/WCHA will not assign a larger bedroom size due to additions of family members other than by birth, adoption, marriage, or court-awarded custody.

All members of the family residing in the unit must be approved by the BHA/WCHA. The family must obtain approval of any additional family member before the person occupies the unit except for additions by birth, adoption, or court-awarded custody, in which case the family must inform the BHA/WCHA within [number of] days.

To avoid vacancies, the BHA/WCHA may provide a family with a larger unit than the occupancy standards permit. The family must agree to move to a suitable, smaller unit when another family qualifies for the larger unit and there is a suitable smaller unit available. This requirement is a provision of the lease.

10.3 SELECTION FROM THE WAITING LIST

The BHA/WCHA shall follow the statutory requirement that at least 40% of newly admitted families in any fiscal year be families whose annual income is at or below 30% of the area median income. To insure this requirement is met we shall quarterly monitor the incomes of newly admitted families and the incomes of the families on the waiting list. If it appears that the requirement to house extremely low-income families will not be met, we will skip higher income families on the waiting list to reach extremely low-income families.

If there are not enough extremely low-income families on the waiting list we will conduct outreach on a non-discriminatory basis to attract extremely low-income families to reach the statutory requirement.

10.4 DECONCENTRATION POLICY

It is BHA/WCHA's policy to provide for deconcentration of poverty and encourage income mixing by bringing higher income families into lower income developments and lower income families into higher income developments. Toward this end, we will skip families on the waiting list to reach other families with a lower or higher income. We will accomplish this in a uniform and non-discriminating manner.

The BHA/WCHA will affirmatively market our housing to all eligible income groups. Lower income residents will not be steered toward lower income developments and higher income people will not be steered toward higher income developments.

Prior to the beginning of each fiscal year, we will analyze the income levels of families residing in each of our developments, the income levels of census tracts in which our developments are located, and the income levels of the families on the waiting list. Based on this analysis, we will determine the level of marketing strategies and deconcentration incentives to implement.

10.5 DECONCENTRATION INCENTIVES

The BHA/WCHA may offer one or more incentives to encourage applicant families whose income classification would help to meet the deconcentration goals of a particular development.

Various incentives may be used at different times, or under different conditions, but will always be provided in a consistent and nondiscriminatory manner.

10.6 OFFER OF A UNIT

The BHA/WCHA plan for selection of applicants and assignment of dwelling units to assure equal opportunity and non-discrimination on grounds of race, color, sex, religion, or national origin is:

Under this plan the first qualified applicant in sequence on the waiting list will be made one offer of a unit of the appropriate size. [at a site in which the applicant seeks to reside].

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

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

Changes that occur during the period between removal from the waiting list and an offer of a suitable unit may affect the family's eligibility or Total Tenant Payment. The family will be notified in writing of changes in their eligibility or level of benefits and offered their right to an informal hearing when applicable

For the offer of **accessible units**, the following principles shall apply:

The BHA/WCHA has units designed for persons with mobility, sight and hearing impairments, referred to as accessible units.

No non-mobility impaired families will be offered these units until all eligible mobility-impaired applicants have been considered.

Before offering a vacant accessible unit to a non-disabled applicant, the BHA/WCHA will offer such units:

First, to a current occupant of another unit of the same development, or other public housing developments under the BHA/WCHA's control, who has a disability that requires the special features of the vacant unit.

Second, to an eligible qualified applicant on the waiting list having a disability that requires the special features of the vacant unit.

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

10.7 REJECTION OF UNIT

If in making the offer to the family the BHA/WCHA skipped over other families on the waiting list in order to meet their deconcentration goal or offered the family any other deconcentration incentive and the family rejects the unit, the family will not lose their place on the waiting list and will not be otherwise penalized. If the unit offered is inappropriate for the applicant's disabilities, the family will retain their position on the waiting list.

If the BHA/WCHA did not skip over other families on the waiting list to reach this family, did not offer any other deconcentration incentive, and the family rejects the unit without good cause, the family will forfeit their application's date and time. The family will keep their preferences, but the date and time of application will be changed to the date and time the unit was rejected.

If the family rejects with good cause any unit offered, they will not lose their place on the waiting list. Good cause includes reasons related to health, proximity to work, school, and childcare (for those working or going to school). The family will be offered the right to an informal review of the decision to alter their application status.

When an applicant rejects the final unit offer the BHA/WCHA will remove the applicant's name from the waiting list. Removal from the waiting list means the applicant must reapply.

10.8 ACCEPTANCE OF UNIT

The family will be required to sign a lease that will become effective no later than three (3) business days after the date of acceptance or the business day after the day the unit becomes available, whichever is later.

Prior to signing the lease all families (head of household) and other adult family members will be required to attend the Lease and Occupancy Orientation when they are initially accepted for occupancy. The family will not be housed if they have not attended the orientation. Applicants who provide prior notice of an inability to attend the orientation will be rescheduled. Failure of an applicant to attend the orientation, without good cause, may result in the cancellation of the occupancy process.

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

The applicant will be provided a copy of the lease, the grievance procedure, utility allowances, utility charges, the current schedule of routine maintenance charges, and a request for reasonable accommodation form. These documents will be explained in detail. The applicant will sign a certification that they have received these documents and that they have reviewed them with Housing Authority personnel. The certification will be filed in the tenant's file.

The signing of the lease and the review of financial information are to be privately handled. The head of household and all adult family members will be required to execute the lease prior to admission. One executed copy of the lease will be furnished to the head of household and the BHA/WCHA will retain the original executed lease in the tenant's file. A copy of the grievance procedure will be attached to the resident's copy of the lease.

New tenants must pay a security deposit to the BHA/WCHA at the time of admission.

The amount of the security and/or pet deposit required is specified in the lease.

The BHA/WCHA may permit installment payments of security deposits when a new tenant demonstrates a financial hardship to the satisfaction of the BHA/WCHA. However, no less than one-half of the required deposit must be paid before occupancy.

The BHA/WCHA will hold the security deposit for the period the tenant occupies the unit.

The BHA/WCHA will refund to the Tenant the amount of the security deposit, less any amount needed to pay the cost of:

Unpaid Rent;

Damages listed on the Move-Out Inspection Report that exceed normal wear and tear;

Other charges under the Lease.

The BHA/WCHA will refund the Security Deposit less any amounts owed, within 30 days after move out and tenant's notification of new address.

The BHA/WCHA will refund the Pet Deposit to the tenant, less any damage caused by the pet to the dwelling unit, upon removal of the pet or the owner from the unit.

The BHA/WCHA will return the Pet Deposit to the former tenant or to the person designated by the former tenant in the event of the former tenant's incapacitation or death.

The BHA/WCHA will provide the tenant or designee identified above with a written list of any charges against the security or pet deposits. If the tenant disagrees with the amount charged to the security or pet deposits, the BHA/WCHA will provide a meeting to discuss the charges.

The resident must leave the dwelling unit in a clean and undamaged (beyond normal wear and tear) condition and must furnish a forwarding address to the BHA/WCHA . All keys to the unit must be returned to the Management upon vacating the unit.

The BHA/WCHA will not use the security deposit for payment of rent or other charges while the tenant is living in the unit.

11.0 INCOME, EXCLUSIONS FROM INCOME, AND DEDUCTIONS FROM INCOME

- 1.
2. To determine annual income, the BHA/WCHA counts the income of all family members, excluding the types and sources of income that are specifically excluded. Once the annual income is determined, the BHA/WCHA subtracts all allowable deductions (allowances) to determine the Total Tenant Payment.

11.1 INCOME

1. Annual income means all amounts, monetary or not, that:
 - A. Go to (or on behalf of) the family head or spouse (even if temporarily absent) or to any other family member; or
 7. B. Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
 - C. Are not specifically excluded from annual income.
1. Annual income includes, but is not limited to:
 7. A. The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services.
 - 8.
 9. B. The net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness are not used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight-line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession is included in income, except to the extent the withdrawal is a reimbursement of cash or assets invested in the operation by the family.

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

- 10.
11. C. Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness are not used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight-line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from an investment is included in income, except to the extent the withdrawal is reimbursement of cash or assets invested by the family. Where the family has net family assets in excess of \$5,000, annual income includes the greater of the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate, as determined by HUD.
- 12.
13. D. The full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts, including a lump-sum amount or prospective monthly amounts for the delayed start of a periodic amount. (However, deferred periodic amounts from supplemental security income and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts are excluded.)
- 14.
15. E. Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation, and severance pay. (However, lump sum additions such as insurance payments from worker's compensation are excluded.)
- 16.
17. F. Welfare assistance.
 1. If the welfare assistance payment includes an amount specifically designated for shelter and utilities that is subject to adjustment by the welfare assistance agency in accordance with the actual cost of shelter and utilities, the amount of welfare assistance income to be included as income consists of:
 - a. The amount of the allowance or grant exclusive of the amount specifically designated for shelter or utilities; plus
 - b. The maximum amount that the welfare assistance agency could in fact allow the family for shelter and utilities. If the family's welfare assistance is ratably reduced from the standard of need by applying a percentage, the amount calculated under this requirement is the amount resulting from one application of the percentage.
 2. If the amount of welfare is reduced due to an act of fraud by a family member or because of any family member's failure to comply with requirements to

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

participate in an economic self-sufficiency program or work activity, the amount of rent required to be paid by the family will not be decreased. In such cases, the amount of income attributable to the family will include what the family would have received had they complied with the welfare requirements and/or had not committed an act of fraud.

3. If the amount of welfare assistance is reduced as a result of a lifetime time limit, the reduced amount is the amount that shall be counted as income.
7. G. Periodic and determinable allowances, such as alimony, child support payments, and regular contributions or gifts received from organizations or from persons not residing in the dwelling.
- 8.
9. H. All regular pay, special pay, and allowances of a member of the Armed Forces. (Special pay to a member exposed to hostile fire is excluded.)
- 10.

11.2 ANNUAL INCOME

- 1.
2. Annual income does not include the following:
 - A. Income from employment of children (including foster children) under the age of 18 years;
 - B. Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the tenant family, who are unable to live alone);
 - C. Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains, and settlement for personal or property losses;
 - D. Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member;
 - E. Income of a live-in aide;
 - F. The full amount of student financial assistance paid directly to the student or to the educational institution;
 - G. The special pay to a family member serving in the Armed Forces who is exposed to hostile fire;

- H. The amounts received from the following programs:
1. Amounts received under training programs funded by HUD;
 2. Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS);
 3. Amounts received by a participant in other publicly assisted programs that are specifically for or in reimbursement of out-of-pocket expenses incurred (special equipment, clothing, transportation, child care, etc.) and that are made solely to allow participation in a specific program;
 4. Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the Housing Authority or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, and resident initiatives coordination. No resident may receive more than one such stipend during the same period of time;
 5. Incremental earnings and benefits resulting to any family member from participation in qualifying State or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the employment training program;
 6. Temporary, non-recurring or sporadic income (including gifts);
 7. Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;
 8. Earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of household and spouse);
 9. Adoption assistance payments in excess of \$480 per adopted child;

10. For family members who enrolled in certain training programs prior to 10/1/99, the earnings and benefits resulting from the participation if the program provides employment training and supportive services in accordance with the Family Support Act of 1988, Section 22 of the 1937 Act (42 U.S.C. 1437t), or any comparable Federal, State, or local law during the exclusion period. For purposes of this exclusion the following definitions apply:

a. Comparable Federal, State or local law means a program providing employment training and supportive services that:

- i. Is authorized by a Federal, State or local law;
- ii. Is funded by the Federal, State or local government;
- iii. Is operated or administered by a public agency; and
- iv. Has as its objective to assist participants in acquiring employment skills.

b. Exclusion period means the period during which the family member participates in a program described in this section, plus 18 months from the date the family member begins the first job acquired by the family member after completion of such program that is not funded by public housing assistance under the 1937 Act. If the family member is terminated from employment with good cause, the exclusion period shall end.

c. Earnings and benefits means the incremental earnings and benefits resulting from a qualifying employment training program or subsequent job.

7. 11. The incremental earnings due to employment during the 12-month period following date of hire shall be excluded. This exclusion (paragraph 11) will not apply for any family who concurrently is eligible for exclusion #10. Additionally, this exclusion is only available to the following families:

8.

9. a. Families whose income increases as a result of employment of a family member who was previously unemployed for one or more years.

10.

11. b. Families whose income increases during the participation of a family member in any family self-sufficiency program.

12.

c. Families who are or were, within 6 months, assisted under a State TANF program.

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

- 4.
5. Any family member qualifying for this exclusion may do so only once and is subject to a lifetime limit of dating the exclusion as described above over a 48 month time limit from the start of claiming the exclusion.

(While HUD regulations allow for the housing authority to offer an escrow account in lieu of having a portion of their income excluded under this paragraph, it is the policy of this housing authority to provide the exclusion in all cases.)

12. Deferred periodic amounts from supplemental security income and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts;
13. 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;
7. 14. Amounts paid by a State agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home; or
7. 15. Amounts specifically excluded by any other Federal statute from consideration as income for purposes of determining eligibility or benefits. These exclusions include:
 - a. The value of the allotment of food stamps
 - b. Payments to volunteers under the Domestic Volunteer Services Act of 1973
 - c. Payments received under the Alaska Native Claims Settlement Act
 - d. Income from submarginal land of the U.S. that is held in trust for certain Indian tribes
 - e. Payments made under HHS's Low-Income Energy Assistance Program
 - f. Payments received under the Job Training Partnership Act

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

- g. Income from the disposition of funds of the Grand River Band of Ottawa Indians
- h. The first \$2000 per capita received from judgment funds awarded for certain Indian claims
- i. Amount of scholarships awarded under Title IV including Work Study
- j. Payments received under the Older Americans Act of 1965
- k. Payments from Agent Orange Settlement
- l. Payments received under the Maine Indian Claims Act
- m. The value of child care under the Child Care and Development Block Grant Act of 1990
- n. Earned income tax credit refund payments
- o. Payments for living expenses under the AmeriCorps Program
- l. p. Additional income exclusions provided by and funded by the BHA/WCHA

The BHA/WCHA will not provide exclusions from income in addition to those already provided for by HUD.

11.3 DEDUCTIONS FROM ANNUAL INCOME

The following deductions will be made from annual income:

- 7. A. \$480 for each dependent;
- 8.
- 9. B. \$400 for any elderly family or disabled family;
- 10.
- 11. C. For any family that is not an elderly or disabled family but has a member (other than the head or spouse) who is a person with a disability, disability assistance expenses in excess of 3% of annual income. This allowance may not exceed the employment income received by family members who are 18 years of age or older as a result of the assistance to the person with disabilities.
- 12.

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

- 13. D. For any elderly or disabled family:
- 14.
 - 15. That has no disability assistance expenses, an allowance for medical expenses equal to the amount by which the medical expenses exceed 3% of annual income;
 - 16.
 - 17. That has disability expenses greater than or equal to 3% of annual income, an allowance for disability assistance expenses computed in accordance with paragraph C, plus an allowance for medical expenses that equal the family's medical expenses;
 - 18.
 - 19. That has disability assistance expenses that are less than 3% of annual income, an allowance for combined disability assistance expenses and medical expenses that is equal to the total of these expenses less 3% of annual income.
 - 20.
- 21. E. Child care expenses.

12.0 VERIFICATION

The BHA/WCHA will verify information related to waiting list preferences, eligibility, admission, and level of benefits prior to admission. Periodically during occupancy, items related to eligibility and rent determination shall also be reviewed and verified. Income, assets, and expenses will be verified, as well as disability status, need for a live-in aide and other reasonable accommodations; full time student status of family members 18 years of age and older; Social Security numbers; and citizenship/eligible non-citizen status. Age and relationship will only be verified in those instances where needed to make a determination of level of assistance.

12.1 ACCEPTABLE METHODS OF VERIFICATION

Age, relationship, U.S. citizenship, and Social Security numbers will generally be verified with documentation provided by the family. For citizenship, the family's certification will be accepted. (Or for citizenship documentation such as listed below will be required.) Verification of these items will include photocopies of the Social Security cards and other documents presented by the family, the INS SAVE approval code, and forms signed by the family.

Other information will be verified by third party verification. This type of verification includes written documentation with forms sent directly to and received directly by a source, not passed through the hands of the family. This verification may also be direct contact with the source, in person or by telephone. It may also be a report generated by a request from the BHA/WCHA or automatically by another government agency, i.e. the Social Security Administration.

ACOP
 Bellingham Housing Authority
 Whatcom County Housing Authority

Verification forms and reports received will be contained in the applicant/tenant file. Oral third party documentation will include the same information as if the documentation had been written, i.e. name date of contact, amount received, etc.

When third party verification cannot be obtained, the BHA/WCHA will accept documentation received from the applicant/tenant. Hand-carried documentation will be accepted if the BHA/WCHA has been unable to obtain third party verification in a 4-week period of time. Photocopies of the documents provided by the family will be maintained in the file.

When neither third party verification nor hand-carried verification can be obtained, the BHA/WCHA will accept a notarized statement signed by the head, spouse or co-head. Such documents will be maintained in the file.

12.2 TYPES OF VERIFICATION

The chart below outlines the factors that may be verified and gives common examples of the verification that will be sought. To obtain written third party verification, the BHA/WCHA will send a request form to the source along with a release form signed by the applicant/tenant via first class mail.

Verification Requirements for Individual Items		
Item to Be Verified	3 rd party verification	Hand-carried verification
General Eligibility Items		
Social Security Number	Letter from Social Security, electronic reports	Social Security card
Citizenship	N/A	Signed certification, voter's registration card, birth certificate, etc.
Eligible immigration status	INS SAVE confirmation #	INS card
Disability	Letter from medical professional, SSI, etc.	Proof of SSI or Social Security disability payments
Full time student status (if >18)	Letter from school	For high school students, any document evidencing enrollment

ACOP
 Bellingham Housing Authority
 Whatcom County Housing Authority

Verification Requirements for Individual Items		
Item to Be Verified	3 rd party verification	Hand-carried verification
Need for a live-in aide	Letter from doctor or other professional knowledgeable of condition	N/A
Child care costs	Letter from care provider	Bills and receipts
Disability assistance expenses	Letters from suppliers, care givers, etc.	Bills and records of payment
Medical expenses	Letters from providers, prescription record from pharmacy, medical professional's letter stating assistance or a companion animal is needed	Bills, receipts, records of payment, dates of trips, mileage log, receipts for fares and tolls
Value of and Income from Assets		
Savings, checking accounts	Letter from institution	Passbook, most current statements
CDS, bonds, etc.	Letter from institution	Tax return, information brochure from institution, the CD, the bond
Stocks	Letter from broker or holding company	Stock or most current statement, price in newspaper or through Internet
Real property	Letter from tax office, assessment, etc.	Property tax statement (for current value), assessment, records or income and expenses, tax return
Personal property	Assessment, bluebook, etc.	Receipt for purchase, other evidence of worth
Cash value of life insurance policies	Letter from insurance company	Current statement
Assets disposed of for less than fair market value	N/A	Original receipt and receipt at disposition, other evidence of

ACOP
 Bellingham Housing Authority
 Whatcom County Housing Authority

Verification Requirements for Individual Items		
Item to Be Verified	3 rd party verification	Hand-carried verification
		worth
Income		
Earned income	Letter from employer	Multiple pay stubs
Self-employed	N/A	Tax return from prior year, books of accounts
Regular gifts and contributions	Letter from source, letter from organization receiving gift (i.e., if grandmother pays day care provider, the day care provider could so state)	Bank deposits, other similar evidence
Alimony/child support	Court order, letter from source, letter from Human Services	Record of deposits, divorce decree
Periodic payments (i.e., social security, welfare, pensions, workers compensation, unemployment)	Letter or electronic reports from the source	Award letter, letter announcing change in amount of future payments
Training program participation	<ul style="list-style-type: none"> Letter from program provider indicating - whether enrolled or completed - whether training is HUD-funded - whether Federal, State, local govt., or local program - whether it is employment training - whether it has clearly defined goals and objectives - whether program has supportive services - whether payments are for out-of-pocket expenses incurred in order to participate in a program - date of first job after program completion 	<p>N/A</p> <p>Evidence of job start</p>

12.2.1 VERIFICATION OF FAMILY RELATIONSHIP AND RELATED ISSUES:

Certification will normally be considered sufficient verification of family relationships. In cases where reasonable doubt exists, the family may be asked to provide verification.

The following verifications will be required if certification is insufficient:

Verification of relationship:

Official identification showing name

Birth Certificates

Baptismal certificates

Verification of guardianship is:

Court-ordered assignment

Affidavit of parent

Verification from social services agency

School records

Evidence of an established family relationship:

Joint bank accounts or other shared financial transactions

Leases or other evidence of prior cohabitation

Credit reports showing relationship

For Split Households: Domestic Violence

Verification of domestic violence when assessing applicant split households includes:

Shelter for battered persons

Police reports

District Attorney's office

For Verification of Permanent Absence of Adult Member

If an adult member who was formerly a member of the household is reported permanently absent by the family, the BHA/WCHA will consider any of the following as verification:

Husband or wife institutes divorce action.

Husband or wife institutes legal separation.

Order of protection/restraining order obtained by one family member against another.

Proof of another home address, such as utility bills, canceled checks for rent, drivers license, or lease or rental agreement, if available.

Statements from other agencies such as social services that the adult family member is no longer living at that location.

If no other proof can be provided, the BHA/WCHA will accept a Notarized Statement from the family.

If the adult family member is incarcerated, a document from the Court or prison should be obtained stating how long they will be incarcerated.

For Verification of Change in Family Composition

The BHA/WCHA may verify changes in family composition (either reported or unreported) through letters, telephone calls, utility records, inspections, landlords, neighbors, credit data, school or DMV records, and other sources.

12.3 VERIFICATION OF CITIZENSHIP OR ELIGIBLE NONCITIZEN STATUS

7. The citizenship/eligible non-citizen status of each family member regardless of age must be determined.
7. Prior to being admitted, or at the first reexamination, all citizens and nationals will be required to sign a declaration under penalty of perjury. They will be required to show proof of their status by such means as a birth certificate, military ID, or military DD 214 Form.
7. Prior to being admitted or at the first reexamination, all eligible non-citizens who are 62 years of age or older will be required to sign a declaration under penalty of perjury. They will also be required to show proof of age.

7. Prior to being admitted or at the first reexamination, all eligible non-citizens must sign a declaration of their status and a verification consent form and provide their original INS documentation. The BHA/WCHA will make a copy of the individual's INS documentation and place the copy in the file. The BHA/WCHA will also verify their status through the INS SAVE system. If the INS SAVE system cannot confirm eligibility, the BHA/WCHA will mail information to the INS in order that a manual check can be made of INS records.
7. Family members who do not claim to be citizens, nationals, or eligible non-citizens must be listed on a statement of non-eligible members and the list must be signed by the head of the household.
7. Non-citizen students on student visas, though in the country legally, are not eligible to be admitted to public housing.
7. Any family member who does not choose to declare their status must be listed on the statement of non-eligible members.
- 8.
9. If no family member is determined to be eligible under this section, the family's eligibility will be denied.
7. The family's assistance will not be denied, delayed, reduced, or terminated because of a delay in the process of determining eligible status under this section, except to the extent that the delay is caused by the family.
7. If the BHA/WCHA determines that a family member has knowingly permitted an ineligible non-citizen (other than any ineligible non-citizens listed on the lease) to permanently reside in their public housing unit, the family will be evicted. Such family will not be eligible to be readmitted to public housing for a period of 24 months from the date of eviction or termination.

12.4 VERIFICATION OF SOCIAL SECURITY NUMBERS

7. Prior to admission, each family member who has a Social Security number and who is at least 6 years of age must provide verification of their Social Security number. New family members at least 6 years of age must provide this verification prior to being added to the lease. Children in assisted households must provide this verification at the first regular reexamination after turning six.
7. The best verification of the Social Security number is the original Social Security card. If the card is not available, the BHA/WCHA will accept letters from the Social Security Agency that establishes and states the number. Documentation from other governmental agencies will also be accepted that establishes and states the number. Driver's licenses, military IDs, passports, or

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

other official documents that establish and state the number are also acceptable.

7. If an individual states that they do not have a Social Security number, they will be required to sign a statement to this effect. The BHA/WCHA will not require any individual who does not have a Social Security number to obtain a Social Security number.
7. If a member of an applicant family indicates they have a Social Security number, but cannot readily verify it, the family cannot be housed until verification is provided.
- 8.
9. If a member of a tenant family indicates they have a Social Security number, but cannot readily verify it, they shall be asked to certify to this fact and shall have up to sixty (60) days to provide the verification. If the individual is at least 62 years of age, they will be given one hundred and twenty (120) days to provide the verification. If the individual fails to provide the verification within the time allowed, the family will be evicted.

12.5 TIMING OF VERIFICATION

Verification information must be dated within ninety (90) days of certification or reexamination. If the verification is older than this, the source will be contacted and asked to provide information regarding any changes.

When an interim reexamination is conducted, the Housing Authority will verify and update all information related to family circumstances and level of assistance. (Or, the Housing Authority will only verify and update those elements reported to have changed.)

12.6 FREQUENCY OF OBTAINING VERIFICATION

For each family member, citizenship/eligible non-citizen status will be verified only once. This verification will be obtained prior to admission. If the status of any family member was not determined prior to admission, verification of their status will be obtained at the next regular reexamination. Prior to a new member joining the family, their citizenship/eligible non-citizen status will be verified.

For each family member age 6 and above, verification of Social Security number will be obtained only once. This verification will be accomplished prior to admission. When a family member who did not have a Social Security number at admission receives a Social Security number, that number will be verified at the next regular reexamination. Likewise, when a child turns six, their verification will be obtained at the next regular reexamination.

13.0 DETERMINATION OF TOTAL TENANT PAYMENT AND TENANT RENT

13.1 FAMILY CHOICE

At admission and each year in preparation for their annual reexamination, each family is given the choice of having their rent determined under the formula method or having their rent set at the flat rent amount.

7. A. Families who opt for the flat rent will be required to go through the income reexamination process every three years, rather than the annual review they would otherwise undergo.
7. B. Families who opt for the flat rent may request to have a reexamination and return to the formula based method at any time for any of the following reasons:
 7. 1. The family's income has decreased.
 7. 2. The family's circumstances have changed increasing their expenses for child care, medical care, etc.
 7. 3. Other circumstances creating a hardship on the family such that the formula method would be more financially feasible for the family.

13.2 THE FORMULA METHOD

- 7.
8. The total tenant payment is equal to the highest of:
 9. A. 10% of monthly income;
 - B. 30% of adjusted monthly income; or
 - C. The welfare rent.
- 7.
8. The family will pay the greater of the total tenant payment or the minimum rent of **\$50**
- 9.
10. In the case of a family who has qualified for the income exclusion at Section 11.2(H)(11), upon the expiration of the 12-month period described in that section, an additional rent benefit accrues to the family. If the family member's employment continues, then for the 12-month period following the 12-month period of disallowance, the resulting rent increase will be capped at 50 percent of the rent increase the family would have otherwise received.

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

13.3 *MINIMUM RENT*

The BHA/WCHA has set the minimum rent at \$50. However if the family requests a hardship exemption, the BHA/WCHA will immediately suspend the minimum rent for the family until the Housing Authority can determine whether the hardship exists and whether the hardship is of a temporary or long-term nature.

- A. A hardship exists in the following circumstances:
 - 1. When the family has lost eligibility for or is waiting an eligibility determination for a Federal, State, or local assistance program;
 - 2. When the family would be evicted as a result of the imposition of the minimum rent requirement;
 - 3. When the income of the family has decreased because of changed circumstances, including loss of employment;
 - 4. When the family has an increase in expenses because of changed circumstances, for medical costs, childcare, transportation, education, or similar items;
 - 5. When a death has occurred in the family.
- B. No hardship. If the Housing Authority determines there is no qualifying hardship, the minimum rent will be reinstated, including requiring back payment of minimum rent for the time of suspension.
- C. Temporary hardship. If the Housing Authority reasonably determines that there is a qualifying hardship but that it is of a temporary nature, the minimum rent will be not be imposed for a period of 90 days from the date of the family's request. At the end of the 90-day period, the minimum rent will be imposed retroactively to the time of suspension. The Housing Authority will offer a repayment agreement in accordance with the Section 19 of this policy for any rent not paid during the period of suspension. During the suspension period the Housing Authority will not evict the family for nonpayment of the amount of tenant rent owed for the suspension period.
- D. Long-term hardship. If the Housing Authority determines there is a long-term hardship, the family will be exempt from the minimum rent requirement until the hardship no longer exists.

- E. Appeals. The family may use the grievance procedure to appeal the Housing Authority's determination regarding the hardship. No escrow deposit will be required in order to access the grievance procedure.

13.4 THE FLAT RENT

The BHA/WCHA has set a flat rent for each public housing unit. In doing so, it considered the size and type of the unit, as well as its condition, amenities, services, and neighborhood. The BHA/WCHA determined the market value of the unit and set the rent at the market value. The amount of the flat rent will be reevaluated annually and adjustments applied. Affected families will be given a 30-day notice of any rent change. Adjustments are applied on the anniversary date for each affected family (for more information on flat rents, see Section 15.3).

The BHA/WCHA will post the flat rents at each of the developments and at the central office and are incorporated in this policy upon approval by the Board of Commissioners.

13.5 CEILING RENT

The BHA/WCHA does not have a ceiling rent.

13.6 RENT FOR FAMILIES UNDER THE NONCITIZEN RULE

- 7. A mixed family will receive full continuation of assistance if all of the following conditions are met:
 - A. The family was receiving assistance on June 19, 1995;
 - 7. B. The family was granted continuation of assistance before November 29, 1996;
 - C. The family's head or spouse has eligible immigration status; and
 - D. The family does not include any person who does not have eligible status other than the head of household, the spouse of the head of household, any parent of the head or spouse, or any child (under the age of 18) of the head or spouse.

If a mixed family qualifies for prorated assistance but decides not to accept it, or if the family has no eligible members, the family may be eligible for temporary deferral of termination of assistance to permit the family additional time for the orderly transition of some or all of its members to locate other affordable housing. Under this provision, the family receives full assistance. If assistance is granted under this provision prior to November 29, 1996, it may last

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

no longer than three (3) years. If granted after that date, the maximum period of time for assistance under the provision is eighteen (18) months. The BHA/WCHA will grant each family a period of six (6) months to find suitable affordable housing. If the family cannot find suitable affordable housing, the BHA/WCHA will provide additional search periods up to the maximum time allowable.

Suitable housing means housing that is not substandard and is of appropriate size for the family. Affordable housing means that it can be rented for an amount not exceeding the amount the family pays for rent, plus utilities, plus 25%.

The family's assistance is prorated in the following manner:

- A. Determine the 95th percentile of gross rents (tenant rent plus utility allowance) for the BHA/WCHA. The 95th percentile is called the maximum rent.
- B. Subtract the family's total tenant payment from the maximum rent. The resulting number is called the maximum subsidy.
- C. Divide the maximum subsidy by the number of family members and multiply the result times the number of eligible family members. This yields the prorated subsidy.
- D. Subtract the prorated subsidy from the maximum rent to find the prorated total tenant payment. From this amount subtract the full utility allowance to obtain the prorated tenant rent.

13.7 UTILITY ALLOWANCE

7. The BHA/WCHA shall establish a utility allowance for all check-metered utilities and for all tenant-paid utilities. The allowance will be based on a reasonable consumption of utilities by an energy-conservative household of modest circumstances consistent with the requirements of a safe, sanitary, and healthful environment. In setting the allowance, the BHA/WCHA will review the actual consumption of tenant families as well as changes made or anticipated due to modernization (weatherization efforts, installation of energy-efficient appliances, etc.). Allowances will be evaluated at least annually as well as any time utility rate changes by 10% or more since the last revision to the allowances.

8.

The utility allowance will be subtracted from the family's formula or flat rent to determine the amount of the Tenant Rent. The Tenant Rent is the amount the family owes each month to the BHA/WCHA. The amount of the utility allowance is then still available to the family to pay the cost of their utilities. Any utility cost above the allowance is the responsibility of the tenant. Any savings resulting from utility costs below the amount of the allowance belongs to the tenant.

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

1. For BHA/WCHA paid utilities, the BHA/WCHA will monitor the utility consumption of each household. Any consumption in excess of the allowance established by the BHA/WCHA will be billed to the tenant monthly.

7. Utility allowance revisions based on rate changes shall be effective 60 days after notice to residents. Revisions based on changes in consumption or other reasons shall become effective at each family's next annual reexamination.

1. Families with high utility costs are encouraged to contact the BHA/WCHA for an energy analysis. The analysis may identify problems with the dwelling unit that once corrected will reduce energy costs. The analysis can also assist the family in identifying ways they can reduce their costs.

7. Requests for relief from surcharges for excess consumption of BHA/WCHA purchased utilities or from payment of utility supplier billings in excess of the utility allowance for tenant-paid utility costs may be granted by the BHA/WCHA on reasonable grounds. Requests shall be granted to families that include an elderly member or a member with disabilities. Requests by the family shall be submitted under the Reasonable Accommodation Policy. Families shall be advised of their right to individual relief at admission to public housing and at time of utility allowance changes.

13.8 PAYING RENT

Rent and other charges are due and payable on the first day of the month. All rents should be paid at **(Insert location to pay rent)**. Reasonable accommodations for this requirement will be made for persons with disabilities. As a safety measure, no cash shall be accepted as a rent payment

If the rent is not paid by the fifth of the month, a Notice to Vacate will be issued to the tenant. In addition, a \$5 and for every day after the 5th of the month a charge or \$1 a day will be assessed. If rent is paid by a personal check and the check is returned for insufficient funds, this shall be considered a non-payment of rent and will incur the late charge plus an additional charge of \$10 for processing costs.

14.0 CONTINUED OCCUPANCY AND COMMUNITY SERVICE

14.1 GENERAL

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

In order to be eligible for continued occupancy, each adult family member must either (1) contribute eight hours per month of community service (not including political activities) within the community in which the public housing development is located, or (2) participate in an economic self-sufficiency program unless they are exempt from this requirement

14.2 EXEMPTIONS

- 7.
8. The following adult family members of tenant families are exempt from this requirement.
 7. A. Family members who are 62 or older
 7. B. Family members who are blind or disabled and whose disability prevents them from complying with this section.
 7. C. Family members who are the primary care giver for someone who is blind or disabled
 7. D. Family members engaged in work activity
 7. E. Family members who are exempt from work activity under part A title IV of the Social Security Act or under any other State welfare program, including the welfare-to-work program
 7. F. Family members receiving assistance under a State program funded under part A title IV of the Social Security Act or under any other State welfare program, including welfare-to-work and who are in compliance with that program

14.3 NOTIFICATION OF THE REQUIREMENT

7. The BHA/WCHA shall identify all adult family members who are apparently not exempt from the community service requirement.
7. The BHA/WCHA shall notify all such family members of the community service requirement and of the categories of individuals who are exempt from the requirement. The notification will provide the opportunity for family members to claim and explain an exempt status. The BHA/WCHA shall verify such claims.
7. The notification will advise families that their community service obligation will begin upon the effective date of their first annual reexamination on or after 10/1/99. For family's paying a flat rent, the obligation begins on the date their annual reexamination would have been effective had an annual reexamination taken place. It will also advise them that failure to comply with the

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

community service requirement will result in ineligibility for continued occupancy at the time of any subsequent annual reexamination.

14.4 VOLUNTEER OPPORTUNITIES

Community service includes performing work or duties in the public benefit that serve to improve the quality of life and/or enhance resident self-sufficiency, and/or increase the self-responsibility of the resident within the community.

An economic self-sufficiency program is one that is designed to encourage, assist, train or facilitate the economic independence of participants and their families or to provide work for participants. These programs may include programs for job training, work placement, basic skills training, education, English proficiency, work fare, financial or household management, apprenticeship, and any program necessary to ready a participant to work (such as substance abuse or mental health treatment).

The BHA/WCHA will coordinate with social service agencies, local schools, The Whatcom Volunteer Center, and the Human Resources Office in identifying a list of volunteer community service positions.

- 7.
8. Together with the resident advisory councils, the BHA/WCHA may create volunteer positions such as hall monitoring, litter patrols, and supervising and record keeping for volunteers.

14.5 THE PROCESS

7. At the first annual reexamination on or after October 1, 1999, and each annual reexamination thereafter, the BHA/WCHA will do the following:
 - A. Provide a list of volunteer opportunities to the family members.
 - B. Provide information about obtaining suitable volunteer positions.
 - C. Provide a volunteer time sheet to the family member. Instructions for the time sheet require the individual to complete the form and have a supervisor date and sign for each period of work.
 - D. Assign family members to a volunteer coordinator who will assist the family members in identifying appropriate volunteer positions and in meeting their responsibilities. The volunteer coordinator will track the family member's progress monthly and will meet with the family member as needed to best encourage compliance.

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

- E. Thirty (30) days before the family's next lease anniversary date, the volunteer coordinator will advise the BHA/WCHA whether each applicable adult family member is in compliance with the community service requirement.

14.6 NOTIFICATION OF NON-COMPLIANCE WITH COMMUNITY SERVICE REQUIREMENT

- 7. The BHA/WCHA will notify any family found to be in noncompliance of the following:
 - 8.
 - A. The family member(s) has been determined to be in noncompliance;
 - B. That the determination is subject to the grievance procedure; and
 - C. That, unless the family member(s) enter into an agreement to comply, the lease will not be renewed or will be terminated;

7.
14.7 OPPORTUNITY FOR CURE

- 7. The BHA/WCHA will offer the family member(s) the opportunity to enter into an agreement prior to the anniversary of the lease. The agreement shall state that the family member(s) agrees to enter into an economic self-sufficiency program or agrees to contribute to community service for as many hours as needed to comply with the requirement over the past 12-month period. The cure shall occur over the 12-month period beginning with the date of the agreement and the resident shall at the same time stay current with that year's community service requirement. The first hours a resident earns goes toward the current commitment until the current year's commitment is made.
- 7. The volunteer coordinator will assist the family member in identifying volunteer opportunities and will track compliance on a monthly basis.
- 7. If any applicable family member does not accept the terms of the agreement, does not fulfill their obligation to participate in an economic self-sufficiency program, or falls behind in their obligation under the agreement to perform community service by more than three (3) hours after three (3) months, the BHA/WCHA shall take action to terminate the lease.
- 8.

15.0 RECERTIFICATIONS

At least annually, the BHA/WCHA will conduct a reexamination of family income and circumstances. The results of the reexamination determine (1) the rent the family will pay, and (2) whether the family is housed in the correct unit size.

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

15.1 GENERAL

7. The BHA/WCHA will send a notification letter to the family letting them know that it is time for their annual reexamination, giving them the option of selecting either the flat rent or formula method, and scheduling an appointment if they are currently paying a formula rent. If the family thinks they may want to switch from a flat rent to a formula rent, they should request an appointment. At the appointment, the family can make their final decision regarding which rent method they will choose. The letter also includes, for those families paying the formula method, forms for the family to complete in preparation for the interview. The letter includes instructions permitting the family to reschedule the interview if necessary. The letter tells families who may need to make alternate arrangements due to a disability that they may contact staff to request an accommodation of their needs.
- 8.
9. During the appointment, the BHA/WCHA will determine whether family composition may require a transfer to a different bedroom size unit, and if so, the family's name will be placed on the transfer list.

15.2 MISSED APPOINTMENTS

If the family fails to respond to the letter and fails to attend the interview, a second letter will be mailed. The second letter will advise of a new time and date for the interview, allowing for the same considerations for rescheduling and accommodation as above. The letter will also advise that failure by the family to attend the second scheduled interview will result in the BHA/WCHA taking eviction actions against the family.

15.3 FLAT RENTS

The annual letter to flat rent payers regarding the reexamination process will state the following:

7. A. Each year at the time of the annual reexamination, the family has the option of selecting a flat rent amount in lieu of completing the reexamination process and having their rent based on the formula amount.
7. B. The amount of the flat rent
7. C. A fact sheet about formula rents that explains the types of income counted, the most common types of income excluded, and the categories of allowances that can be deducted from income.
- 8.
9. D. Families who opt for the flat rent will be required to go through the income

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

reexamination process every three years, rather than the annual review they otherwise would undergo.

7. E. Families who opt for the flat rent may request to have a reexamination and return to the formula-based method at any time for any of the following reasons:
 7. 1. The family's income has decreased.
 7. 2. The family's circumstances have changed increasing their expenses for child care, medical care, etc.
 7. 3. Other circumstances creating a hardship on the family such that the formula method would be more financially feasible for the family.
7. F. The dates upon which the BHA/WCHA expects to review the amount of the flat rent, the approximate rent increase the family could expect, and the approximate date upon which a future rent increase could become effective.
7. G. The name and phone number of an individual to call to get additional information or counseling concerning flat rents.
7. H. A certification for the family to sign accepting or declining the flat rent.
- 8.
9. Each year prior to their anniversary date, BHA/WCHA will send a reexamination letter to the family offering the choice between a flat or a formula rent. The opportunity to select the flat rent is available only at this time. At the appointment, the BHA/WCHA may assist the family in identifying the rent method that would be most advantageous for the family. If the family wishes to select the flat rent method without meeting with the BHA/WCHA representative, they may make the selection on the form and return the form to the BHA/WCHA. In such case, the BHA/WCHA will cancel the appointment.

15.4 THE FORMULA METHOD

7. During the interview, the family will provide all information regarding income, assets, expenses, and other information necessary to determine the family's share of rent. The family will sign the HUD consent form and other consent forms that later will be mailed to the sources that will verify the family circumstances.
7. Upon receipt of verification, the BHA/WCHA will determine the family's annual income and will calculate their rent as follows.
- 8.

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

9. The total tenant payment is equal to the highest of:
 10.
 - A. 10% of monthly income; or
 - B. 30% of adjusted monthly income.
 - 7.
8. The family will pay the greater of the total tenant payment or the minimum rent of \$50, but never more than the ceiling rent.

15.5 EFFECTIVE DATE OF RENT CHANGES FOR ANNUAL REEXAMINATIONS

7. The new rent will generally be effective upon the anniversary date with thirty (30) days notice of any rent increase to the family.
7. If the rent determination is delayed due to a reason beyond the control of the family, then any rent increase will be effective the first of the month after the month in which the family receives a 30-day notice of the amount. If the new rent is a reduction and the delay is beyond the control of the family, the reduction will be effective as scheduled on the anniversary date.
7. If the family caused the delay, then any increase will be effective on the anniversary date. Any reduction will be effective the first of the month after the rent amount is determined.

15.6 INTERIM REEXAMINATIONS

During an interim reexamination, only the information affected by the changes being reported will be reviewed and verified.

7. Families will not be required to report any increase in income or decreases in allowable expenses between annual reexaminations.
7. Families are required to report the following changes to the BHA/WCHA between regular reexaminations. If the family's rent is being determined under the formula method, these changes will trigger an interim reexamination. The family shall report these changes within ten (10) days of their occurrence.
 7. A. A member has been added to the family through birth or adoption or court-awarded custody.
 - 8.
 9. B. A household member is leaving or has left the family unit.

In order to add a household member other than through birth or adoption (including a live-in aide), the family must request that the new member be added to the lease. Before adding the new member to the lease, the individual must complete an application form stating their income, assets, and all other information required of an applicant. The individual must provide their Social Security number if they have one and must verify their citizenship/eligible immigrant status. (Their housing will not be delayed due to delays in verifying eligible immigrant status other than delays caused by the family.) The new family member will go through the screening process similar to the process for applicants. The BHA/WCHA will determine the eligibility of the individual before adding them to the lease. If the individual is found to be ineligible or does not pass the screening criteria, they will be advised in writing and given the opportunity for an informal review. If they are found to be eligible and do pass the screening criteria, their name will be added to the lease. At the same time, if the family's rent is being determined under the formula method, the family's annual income will be recalculated taking into account the circumstances of the new family member. The effective date of the new rent will be in accordance with paragraph below 15.8.

7. Families are not required to, but may at any time, request an interim reexamination based on a decrease in income, an increase in allowable expenses, or other changes in family circumstances. Upon such request, the BHA/WCHA will take timely action to process the interim reexamination and recalculate the tenant's rent.

15.7 SPECIAL REEXAMINATIONS

If a family's income is too unstable to project for twelve (12) months, including families that temporarily have no income (0 renters) or have a temporary decrease in income, the BHA/WCHA may schedule special reexaminations every sixty (60) days until the income stabilizes and an annual income can be determined.

15.8 EFFECTIVE DATE OF RENT CHANGES DUE TO INTERIM OR SPECIAL REEXAMINATIONS

Unless there is a delay in reexamination processing caused by the family, any rent increase will be effective the first of the second month after the month in which the family receives notice of the new rent amount. If the family causes a delay, then the rent increase will be effective on the date it would have been effective had the process not been delayed (even if this means a retroactive increase).

7. If the new rent is a reduction and any delay is beyond the control of the family, the reduction will be effective the first of the month after the interim reexamination should have been completed.
7. If the new rent is a reduction and the family caused the delay or did not report the change in a

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

timely manner, the change will be effective the first of the month after the rent amount is determined.

8.

16.0 UNIT TRANSFERS

16.1 INTRODUCTION

The transferring of families is a very costly procedure, both to the BHA/WCHA and to the families. However, it is the policy of the BHA/WCHA to permit a resident to transfer within or between housing developments; when it is necessary to comply with occupancy standards; or when it will help accomplish the Affirmative Housing goals of the BHA/WCHA.

For purposes of this transfer policy the "losing development" refers to the unit from which the family is moving and the "gaining development" refers to the unit to which the family is transferring.

16.2 GENERAL STATEMENT

A family may be eligible to transfer for valid and certifiable reasons such as enabling the family to be:

Closer to a place of employment;

Closer to a required medical treatment center; or

To move from an upstairs to a downstairs units for medical or accessibility reasons; or

The BHA/WCHA will always consider a request to transfer as a reasonable accommodation for a person with a disability.

The BHA/WCHA will charge the families for any damages to the previous unit that exceed that unit's security deposit.

Except in emergency situations, transfers will be avoided when the family is:

Delinquent in its rent;

In the process of reexamination to determine rent and eligibility; or

About to be asked to move for reasons other than non-payment of rent.

Not in good standing with the BHA/WCHA due to rental history or a history of disturbances.

16.3 RANK ORDER OF TRANSFER LIST

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

The Transfer Waiting list will be maintained in rank order by:

Emergency

Medical hardship

Unit too large or small

Date of approval

16.4 MANDATORY TRANSFERS

If there is a required change in the size of unit needed, it will be necessary for the resident to move to a unit of an appropriate size and a new lease will be executed.

If an appropriate unit is not available, the resident will be placed on a transfer list and moved to such unit when it does become available.

The BHA/WCHA will place all families requiring a mandatory transfer due to occupancy standards on a transfer list, which will be reviewed for need-based transfers before any unit is offered to a family on the waiting list.

If a family that is required to move refuses the offered unit, the BHA/WCHA will evaluate the reason for the refusal and determine if it is one of good cause. If the BHA/WCHA determines that there is no good cause, the BHA/WCHA will begin lease termination proceedings.

16.5 NON-MANDATORY TRANSFERS

When a unit becomes available, and after the transfer list has been reviewed for families requiring a mandatory transfer based on occupancy standards, the transfer list will be reviewed for other families desiring a transfer.

If there is a participant family waiting for transfer to an available and appropriately sized unit, the participant family will be offered the unit.

16.6 EMERGENCY TRANSFERS

The BHA/WCHA will authorize an emergency transfer for a participant family if one of the following conditions occurs:

The resident's unit has been damaged by fire, flood, or other causes to such a degree that the unit is not habitable, provided the damage was not the result of an intentional act, carelessness or negligence on the part of the resident or a member of the resident's household.

Special Circumstance Transfers

The BHA/WCHA will authorize transfers under special circumstances for a participant family if one of the following conditions occurs:

The resident's unit is being modernized or significantly remodeled. In such cases the family may only be offered temporary relocation and may be allowed to return to their unit once rehabilitation is complete.

The BHA/WCHA has a need, at the discretion of the Executive Director to transfer the resident family to another unit and the resident voluntarily agrees to such transfer.

16.7 INCENTIVE TRANSFERS

Transfers that serve the BHA/WCHA's deconcentration policy may include incentives and refusal of a transfer request will have no effect on the family's standing in BHA/WCHA public housing.

16.8 MOVING COSTS

The resident, except when the transfer is due to inhabitability, through no fault of the resident, or the need of the BHA/WCHA, will pay all moving costs related to the transfer.

16.9 SECURITY DEPOSITS

The family will be required to pay a new deposit and upon acceptance of a unit will be informed of the manner in which it is to be paid.

The BHA/WCHA will require a new security deposit of all families.

The resident will be billed for any charges that occur as a result of the resident moving out of the apartment.

16.10 RIGHT OF THE BHA/WCHA IN TRANSFER POLICY

The provisions listed above are to be used as a guide to insure fair and impartial means of assigning units for transfers. It is not intended that this policy will create a property right or any other type of right for a tenant to transfer or refuse to transfer.

17.0 INSPECTIONS

An authorized representative of the BHA/WCHA and an adult family member will inspect the premises prior to commencement of occupancy. A written statement of the condition of the premises will be made, all equipment will be provided, and the statement will be signed by both parties with a copy retained in the BHA/WCHA file and a copy given to the family member. An authorized BHA/WCHA representative will inspect the premises at the time the resident vacates

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

and will furnish a statement of any charges to be made provided the resident turns in the proper notice under State law. The resident's security deposit can be used to offset against any BHA/WCHA damages to the unit.

17.1 MOVE-IN INSPECTIONS

The BHA/WCHA and an adult member of the family will inspect the unit prior to signing the lease. Both parties will sign a written statement of the condition of the unit. A copy of the signed inspection will be given to the family and the original will be placed in the tenant file.

17.2 ANNUAL INSPECTIONS

The BHA/WCHA will inspect each public housing unit annually to ensure that each unit meets the BHA/WCHA's housing standards. Work orders will be submitted and completed to correct any deficiencies.

17.3 PREVENTATIVE MAINTENANCE INSPECTIONS

This is generally conducted along with the annual inspection. This inspection is intended to keep items in good repair. It checks weatherization; checks the condition of the smoke detectors, water heaters, furnaces, automatic thermostats and water temperatures; checks for leaks; and provides an opportunity to change furnace filters and provide other minor servicing that extends the life of the unit and its equipment.

17.4 SPECIAL INSPECTIONS

A special inspection may be scheduled to enable HUD or others to inspect a sample of the housing stock maintained by the BHA/WCHA.

17.5 HOUSEKEEPING INSPECTIONS

Generally, at the time of annual reexamination, or at other times as necessary, the BHA/WCHA will conduct a housekeeping inspection to ensure the family is maintaining the unit in a safe and sanitary condition.

17.6 NOTICE OF INSPECTION

For inspections defined as annual inspections, preventative maintenance inspections, special inspections, and housekeeping inspections the BHA/WCHA will give the tenant at least two (2) days written notice.

17.7 EMERGENCY INSPECTIONS

If any employee and/or agent of the BHA/WCHA has reason to believe that an emergency exists within the housing unit, the unit can be entered without notice. The person(s) that enters the unit will leave a written notice to the resident that indicates the date and time the unit was entered and the reason why it was necessary to enter the unit.

17.8 PRE-MOVE-OUT INSPECTIONS

When a tenant gives notice that they intend to move, the BHA/WCHA will offer to schedule a pre-move-out inspection with the family. The inspection allows the BHA/WCHA to help the family identify any problems which, if left uncorrected, could lead to vacate charges. This inspection is a courtesy to the family and has been found to be helpful both in reducing costs to the family and in enabling the BHA/WCHA to ready units more quickly for the future occupants.

17.9 MOVE-OUT INSPECTIONS

The BHA/WCHA conducts the move-out inspection after the tenant vacates to assess the condition of the unit and determine responsibility for any needed repairs. When possible, the tenant is notified of the inspection and is encouraged to be present. This inspection becomes the basis for any claims that may be assessed against the security deposit.

18.0 PET POLICY

BHA/WCHA have discretion to decide whether or not to develop policies pertaining to the keeping of pets in public housing units. This Chapter explains the BHA/WCHA's policies on the keeping of pets and any criteria or standards pertaining to the policy. The rules adopted are reasonably related to the legitimate interest of this BHA/WCHA to provide a decent, safe and sanitary living environment for all tenants, to protecting and preserving the physical condition of the property, and the financial interest of the BHA/WCHA.

The purpose of this policy is to establish the BHA/WCHA's policy and procedures for ownership of pets in elderly and disabled units and to ensure that no applicant or resident is discriminated against regarding admission or continued occupancy because of ownership of pets. It also establishes reasonable rules governing the keeping of common household pets.

Nothing in this policy or the dwelling lease limits or impairs the right of persons with disabilities to own animals that are used to assist them.

18.1 ANIMALS THAT ASSIST PERSONS WITH DISABILITIES

Pet rules will not be applied to animals who assist persons with disabilities.

To be excluded from the pet policy, the resident/pet owner must certify:

That there is a person with disabilities in the household;

That the animal has been trained to assist with the specified disability

18.2 MANAGEMENT APPROVAL OF PETS

All pets must be approved in advance by the BHA/WCHA management. The pet owner must submit and enter into a Pet Agreement with the BHA/WCHA.

18.3 REGISTRATION OF PETS

Pets must be registered with the BHA/WCHA before they are brought onto the premises. Registration includes certificate signed by a licensed veterinarian or State/local authority that the pet has received all inoculations required by State or local law, and that the pet has no communicable disease(s) and is pest-free.

Dogs and cats must be spayed or neutered.

Execution of a Pet Agreement with the BHA/WCHA stating that the tenant acknowledges complete responsibility for the care and cleaning of the pet will be required.

Registration must be renewed and will be coordinated with the annual recertification date.

Approval for the keeping of a pet shall not be extended pending the completion of these requirements.

18.4 REFUSAL TO REGISTER PETS

The BHA/WCHA may not refuse to register a pet based on the determination that the pet owner is financially unable to care for the pet. If the BHA/WCHA refuses to register a pet, a written notification will be sent to the pet owner stating the reason for denial and shall be served in accordance with HUD Notice requirements.

The BHA/WCHA will refuse to register a pet if:

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

- A. The pet is not a *common household pet* as defined in this policy;
- B. Keeping the pet would violate any House Pet Rules;
- C. The pet owner fails to provide complete pet registration information, or fails to update the registration annually;
- D. The BHA/WCHA reasonably determines that the pet owner is unable to keep the pet in compliance with the pet rules and other lease obligations. The pet's temperament and behavior may be considered as a factor in determining the pet owner's ability to comply with provisions of the lease.

The notice of refusal may be combined with a notice of a pet violation.

A resident who cares for another resident's pet must notify the BHA/WCHA and agree to abide by all of the pet rules in writing.

18.5 STANDARDS FOR PETS

- A. If an approved pet gives birth to a litter, the resident must remove all pets from the premises except one.
- B. Pet rules will not be applied to animals who assist persons with disabilities.

1. Persons With Disabilities

To be excluded from the pet policy, the resident/pet owner must certify:

- a. That there is a person with disabilities in the household;
- b. That the animal has been trained to assist with the specified disability; and
- 1. c. That the animal actually assists the person with the disability.

2. Types of Pets Allowed

No types of pets other than the following may be kept by a resident. Tenants are not permitted to have more than one *type* of pet.

a. Dogs

Maximum number: 1

Maximum adult weight: 25 pounds

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

Must be housebroken

Must be spayed or neutered

Must have all required inoculations

Must be licensed as specified now or in the future by State law and local ordinance

b. Cats

Maximum number 1

Must be declawed

Must be spayed or neutered

Must have all required inoculations

Must be trained to use a litter box or other waste receptacle

Must be licensed as specified now or in the future by State law or local ordinance

c. Birds

Maximum number 2

Must be enclosed in a cage at all times

d. Fish

Maximum aquarium size 20 gallons

Must be maintained on an approved stand

18.6 PETS TEMPORARILY ON THE PREMISES

Pets which are not owned by a tenant will not be allowed.

Residents are prohibited from feeding or harboring stray animals.

This rule excludes visiting pet programs sponsored by a humane society or other non-profit organization and approved by the BHA/WCHA.

State or local laws governing pets temporarily in dwelling accommodations shall prevail.

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

18.7 ADDITIONAL FEES AND DEPOSITS FOR PETS

Tenants with animals must pay a pet deposit.

An initial payment of \$200 on or prior to the date the pet is properly registered and brought into the apartment, and;

The BHA/WCHA reserves the right to change or increase the required deposit by amendment to these rules.

The BHA/WCHA will refund the Pet Deposit to the tenant, less any damage caused by the pet to the dwelling unit, upon removal of the pet or the owner from the unit.

The BHA/WCHA will return the Pet Deposit to the former tenant or to the person designated by the former tenant in the event of the former tenant's incapacitation or death.

All reasonable expenses incurred by the BHA/WCHA as a result of damages directly attributable to the presence of the pet in the project will be the responsibility of the resident, including:

1. The cost of repairs and replacements to the resident's dwelling unit;
2. Fumigation of the dwelling unit;
3. Common areas of the project.

18.8 ALTERATIONS TO UNIT

Residents/pet owners shall not alter their unit, patio, premises or common areas to create an enclosure for any animal. Installation of pet doors is prohibited.

18.9 PET WASTE REMOVAL CHARGE

A separate pet waste removal charge of \$10 per occurrence will be assessed against the resident for violations of the pet policy.

Pet deposit and pet waste removal charges are not part of rent payable by the resident.

All reasonable expenses incurred by the BHA/WCHA as the result of damages directly attributable to the presence of the pet will be the responsibility of the resident, including:

1. The cost of repairs and replacements to the dwelling unit;
2. Fumigation of the dwelling unit.

If the tenant is in occupancy when such costs occur, the tenant shall be billed for such costs as a current charge.

If such expenses occur as the result of a move-out inspection, they will be deducted from the pet deposit. The resident will be billed for any amount which exceeds the pet deposit.

The expense of flea deinfestation shall be the responsibility of the resident.

18.10 PET AREA RESTRICTIONS

Pets must be maintained within the resident's unit. When outside of the unit (within the building or on the grounds) dogs and cats must be kept on a leash or carried and under the control of the resident or other responsible individual at all times.

Pets are not permitted in common areas including lobbies, community rooms and laundry areas except for those common areas which are entrances to and exits from the building.

Residents/Pet Owners are not permitted to exercise pets or permit pets to deposit waste on project premises outside of the areas designated for such purposes.

18.11 NOISE

Pet owners must agree to control the noise of pets so that such noise does not constitute a nuisance to other residents or interrupt their peaceful enjoyment of their housing unit or premises. This includes, but is not limited to loud or continuous barking, howling, whining, biting, scratching, chirping, or other such activities.

18.12 CLEANLINESS REQUIREMENTS

- A.** Litter Box Requirements.

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

7. All animal waste or the litter from litter boxes shall be picked up immediately by the pet owner, disposed of in sealed plastic trash bags, and placed in a trash bin.
- 8.
9. Litter shall not be disposed of by being flushed through a toilet.
- 10.
3. Litter boxes shall be stored inside the resident's dwelling unit.

18.13 REMOVAL OF WASTE FROM OTHER LOCATIONS.

The Resident/Pet Owner shall be responsible for the removal of waste from the exercise area by placing it in a sealed plastic bag and disposing of it in a proper trash receptacle.

The resident/pet owner shall take adequate precautions to eliminate any pet odors within or around the unit and to maintain the unit in a sanitary condition at all times.

18.14 PET CARE

No pet (excluding fish) shall be left unattended in any apartment for a period in excess of 8 hours.

All residents/pet owners shall be responsible for adequate care, nutrition, exercise and medical attention for his/her pet.

Residents/pet owners must recognize that other residents may have chemical sensitivities or allergies related to pets, or may be easily frightened or disoriented by animals. Pet owners must agree to exercise courtesy with respect to other residents.

18.15 RESPONSIBLE PARTIES

The resident/pet owner will be required to designate two responsible parties for the care of the pet if the health or safety of the pet is threatened by the death or incapacity of the pet owner, or by other factors that render the pet owner unable to care for the pet.

18.16 INSPECTIONS

The BHA/WCHA may, after reasonable notice to the tenant during reasonable hours, enter and inspect the premises, in addition to other inspections allowed.

18.17 PET RULE VIOLATION NOTICE

- A. If a determination is made on objective facts supported by written statements, that a resident/pet owner has violated the Pet Rule Policy, written notice will be served.
- B. The Notice will contain a brief statement of the factual basis for the determination and the pet rule(s) which were violated. The notice will also state:
 - 1. That the resident/pet owner has 10 calendar days from the effective date of the service of notice to correct the violation.
 - 2. That the resident/pet owner's failure to correct the violation or appear at a requested meeting may result in initiation of procedures to terminate the pet owner's tenancy.

18.18 NOTICE FOR PET REMOVAL

- A. If the resident/pet owner and the BHA/WCHA are unable to resolve the violation at the meeting or the pet owner fails to correct the violation in the time period allotted by the BHA/WCHA, the BHA/WCHA may serve notice to remove the pet.

The Notice shall contain:

- 1. A brief statement of the factual basis for the BHA/WCHA's determination of the Pet Rule that has been violated;
- 2. The requirement that the resident /pet owner must remove the pet within 7 calendar days of the notice; and
- 3. A statement that failure to remove the pet may result in the initiation of termination of tenancy procedures.

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

18.19 TERMINATION OF TENANCY

The BHA/WCHA may initiate procedures for termination of tenancy based on a pet rule violation if (1) the pet owner has failed to remove the pet or correct a pet rule violation within the time period specified; and (2) the pet rule violation is sufficient to begin procedures to terminate tenancy under terms of the lease.

18.20 PET REMOVAL

- A. If the death or incapacity of the pet owner threatens the health or safety of the pet, or other factors occur that render the owner unable to care for the pet, the situation will be reported to the Responsible Party designated by the resident/pet owner. Includes pets who are poorly cared for or have been left unattended for over 8 hours.
- B. If the responsible party is unwilling or unable to care for the pet, or if the BHA/WCHA after reasonable efforts cannot contact the responsible party, the BHA/WCHA may contact the appropriate State or local agency and request the removal of the pet.
- C. If the pet is removed as a result of any aggressive act on the part of the pet, the pet will not be allowed back on the premises.

18.21 EMERGENCIES

The BHA/WCHA will take all necessary steps to insure that pets which become vicious, display symptoms of severe illness, or demonstrate behavior that constitutes an immediate threat to the health or safety of others, are referred to the appropriate State or local entity authorized to remove such animals.

If it is necessary for the BHA/WCHA to place the pet in a shelter facility, the cost will be the responsibility of the tenant/pet owner.

19.0 REPAYMENT AGREEMENTS

When a resident owes the BHA/WCHA back charges and is unable to pay the balance by the due date, the resident may request that the BHA/WCHA allow them to enter into a Repayment Agreement. The BHA/WCHA has the sole discretion of whether to accept such an agreement.

ACOP
Bellingham Housing Authority
Whatcom County Housing Authority

All Repayment Agreements must assure that the full payment is made within a period not to exceed twelve (12) months. All Repayment Agreements must be in writing and signed by both parties. Failure to comply with the Repayment Agreement terms may subject the Resident to eviction procedures.

For families paying minimum rent and who have had their rent abated for a temporary period, the BHA/WCHA shall enter into a repayment agreement.

20.0 TERMINATION

20.1 TERMINATION BY TENANT

The tenant may terminate the lease at any time upon submitting a 30-day written notice. If the tenant vacates prior to the end of the thirty (30) days, they will be responsible for rent through the end of the notice period or until the unit is re-rented, whichever occurs first.

20.2 TERMINATION BY THE HOUSING AUTHORITY

The BHA/WCHA after 10/1/2000 will not renew the lease of any family that is not in compliance with the community service requirement or an approved Agreement to Cure. If they do not voluntarily leave the property, eviction proceedings will begin.

The BHA/WCHA will terminate the lease for serious or repeated violations of material lease terms. Such violations include but are not limited to the following:

- A. Nonpayment of rent or other charges;
- B. A history of late rental payments;
- C. Failure to provide timely and accurate information regarding family composition, income circumstances, or other information related to eligibility or rent;
- D. Failure to allow inspection of the unit;
- E. Failure to maintain the unit in a safe and sanitary manner;
- F. Assignment or subletting of the premises;
- G. Use of the premises for purposes other than as a dwelling unit (other than for housing authority approved resident businesses);

- H. Destruction of property;
- I. Acts of destruction, defacement, or removal of any part of the premises or failure to cause guests to refrain from such acts;
- J. Any criminal activity on the property or drug-related criminal activity on or off the premises. This includes but is not limited to the manufacture of methamphetamine on the premises of the BHA/WCHA;
- K. Non-compliance with Non-Citizen Rule requirements;
- L. Permitting persons not on the lease to reside in the unit more than fourteen (14) days each year without the prior written approval of the Housing Authority; and
- M. Other good cause.

The BHA/WCHA will take immediate action to evict any household that includes an individual who is subject to a lifetime registration requirement under a State sex offender registration program.

20.3 ABANDONMENT

The BHA/WCHA will consider a unit to be abandoned when a resident has both fallen behind in rent **AND** has clearly indicated by words or actions an intention not to continue living in the unit.

When a unit has been abandoned, an BHA/WCHA representative may enter the unit and remove any abandoned property. It will be stored in a reasonably secure place. A notice will be mailed to the resident stating where the property is being stored and when it will be sold. If the BHA/WCHA does not have a new address for the resident, the notice will be mailed to the unit address so it can be forwarded by the post office.

Any money raised by the sale or disposition of the property goes to cover money owed by the family to the BHA/WCHA such as back rent and the cost of storing and selling the goods. If there is any money left over and the family's forwarding address is known the BHA/WCHA will mail it to the family. If the family's address is not known, the BHA/WCHA will keep it for the resident for one year. If it is not claimed within that time, it belongs to the BHA/WCHA.

Within 30 days of learning of an abandonment, the BHA/WCHA will either return the deposit or provide a statement of why the deposit is being kept.

20.4 RETURN OF SECURITY DEPOSIT

After a family moves out, the BHA/WCHA will return the security deposit within (30 or give the family a written statement of why all or part of the security deposit is being kept. The rental unit must be restored to the same conditions as when the family moved in, except for normal wear and tear. Deposits will not be used to cover normal wear and tear or damage that existed when the family moved in.

The BHA/WCHA will be considered in compliance with the above if the required payment, statement, or both, are deposited in the U.S. mail with first class postage paid within 30 days.

GLOSSARY

50058 Form: The HUD form that housing authorities are required to complete for each assisted household in public housing to record information used in the certification and re-certification process and, at the option of the housing authority, for interim reexaminations.

1937 Housing Act: The United States Housing Act of 1937 (42 U.S.C. 1437 et seq.) (24 CFR 5.100)

Adjusted Annual Income: The amount of household income, after deductions for specified allowances, on which tenant rent is based. (24 CFR 5.611)

Adult: A household member who is 18 years or older or who is the head of the household, or spouse, or co-head.

Allowances: Amounts deducted from the household's annual income in determining adjusted annual income (the income amount used in the rent calculation). Allowances are given for elderly families, dependents, medical expenses for elderly families, disability expenses, and child care expenses for children under 13 years of age. Other allowance can be given at the discretion of the housing authority.

Annual Contributions Contract (ACC): The written contract between HUD and a housing authority under which HUD agrees to provide funding for a program under the 1937 Act, and the housing authority agrees to comply with HUD requirements for the program. (24 CFR 5.403)

Annual Income: All amounts, monetary or not, that:

- A. Go to (or on behalf of) the family head or spouse (even if temporarily absent) or to any other family member; or
- B. Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
- C. Are not specifically excluded from annual income.

Annual Income also includes amounts derived (during the 12-month period) from assets to which any member of the family has access. (1937 Housing Act; 24 CFR 5.609)

Applicant (applicant family): A person or family that has applied for admission to a program but is not yet a participant in the program. (24 CFR 5.403)

As-Paid States: States where the welfare agency adjusts the shelter and utility component of the welfare grant in accordance with actual housing costs. Currently, the four as-paid States are New Hampshire, New York, Oregon, and Vermont.

Assets: The value of equity in savings, checking, IRA and Keogh accounts, real property, stocks, bonds, and other forms of capital investment. The value of necessary items of personal property such as furniture and automobiles are not counted as assets. (Also see "net family assets.")

Asset Income: Income received from assets held by family members. If assets total more than \$5,000, income from the assets is "imputed" and the greater of actual asset income and imputed asset income is counted in annual income. (See "imputed asset income" below.)

Ceiling Rent: Maximum rent allowed for some units in public housing projects.

Certification: The examination of a household's income, expenses, and family composition to determine the family's eligibility for program participation and to calculate the family's share of rent.

Child: For purposes of citizenship regulations, a member of the family other than the family head or spouse who is under 18 years of age. (24 CFR 5.504(b))

Child Care Expenses: Amounts anticipated to be paid by the family for the care of children under 13 years of age during the period for which annual income is computed, but only where such care is necessary to enable a family member to actively seek employment, be gainfully employed, or to further his or her education and only to the extent such amounts are not reimbursed. The amount deducted shall reflect reasonable charges for child care. In the case of child care necessary to permit employment, the amount deducted shall not exceed the amount of employment income that is included in annual income. (24 CFR 5.603(d))

Citizen: A citizen or national of the United States. (24 CFR 5.504(b))

Consent Form: Any consent form approved by HUD to be signed by assistance applicants and participants for the purpose of obtaining income information from employers and SWICAs, return information from the Social Security Administration, and return information for unearned income from the Internal Revenue Service. The consent forms may authorize the collection of other information from assistance applicants or participant to determine eligibility or level of benefits. (24 CFR 5.214)

Decent, Safe, and Sanitary: Housing is decent, safe, and sanitary if it satisfies the applicable housing quality standards.

Department: The Department of Housing and Urban Development. (24 CFR 5.100)

Dependent: A member of the family (except foster children and foster adults), other than the family head or spouse, who is under 18 years of age or is a person with a disability or is a full-time student. (24 CFR 5.603(d))

Dependent Allowance: An amount, equal to \$480 multiplied by the number of dependents, that is deducted from the household's annual income in determining adjusted annual income.

Disability Assistance Expenses: Reasonable expenses that are anticipated, during the period for which annual income is computed, for attendant care and auxiliary apparatus for a disabled family member and that are necessary to enable a family member (including the disabled member) to be employed, provided that the expenses are neither paid to a member of the family nor reimbursed by an outside source. (24 CFR 5.603(d))

Disability Assistance Expense Allowance: In determining adjusted annual income, the amount of disability assistance expenses deducted from annual income for families with a disabled household member.

Disabled Family: A family whose head, spouse, or sole member is a person with disabilities; two or more persons with disabilities living together; or one or more persons with disabilities living with one or more live-in aides. (24 CFR 5.403(b)) (Also see "person with disabilities.")

Disabled Person: See "person with disabilities."

Displaced Family: A family in which each member, or whose sole member, is a person displaced by governmental action (such as urban renewal), 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))

Displaced Person: 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. *[1937 Act]*

Drug-Related Criminal Activity: Drug trafficking or the illegal use, or possession for personal use, of a controlled substance as defined in Section 102 of the Controlled Substances Act (21 U.S.C. 802).

Elderly Family: A family whose head, spouse, or sole member is a person who is at least 62 years of age; two or more persons who are at least 62 years of age living together; or one or more persons who are at least 62 years of age living with one or more live-in aides. (24 CFR 5.403)

Elderly Family Allowance: For elderly families, an allowance of \$400 is deducted from the household's annual income in determining adjusted annual income.

Elderly Person: A person who is at least 62 years of age. (1937 Housing Act)

Extremely low-income families: Those families whose incomes do not exceed 30% of the median income for the area, as determined by the Secretary with adjustments for smaller and larger families.

Fair Housing Act: Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988 (42 U.S.C. 3601 et seq.). (24 CFR 5.100)

Family includes but is not limited to:

- A. A family with or without children;
- B. An elderly family;
- C. A near-elderly family;
- D. A disabled family;
- E. A displaced family;
- F. The remaining member of a tenant family; and
- G. A single person who is not an elderly or displaced person, a person with disabilities, or the remaining member of a tenant family. (24 CFR 5.403)

Family Members: All members of the household other than live-in aides, foster children, and foster adults. All family members permanently reside in the unit, though they may be temporarily absent. All family members are listed on the lease.

Family Self-Sufficiency Program (FSS Program): The program established by a housing authority to promote self-sufficiency among participating families, including the coordination of supportive services. (24 CFR 984.103(b))

Flat Rent: A rent amount the family may choose to pay in lieu of having their rent determined under the formula method. The flat rent is established by the housing authority set at the lesser of the market value for the unit or the cost to operate the unit. Families selecting the flat rent option have their income evaluated once every three years, rather than annually.

Formula Method: A means of calculating a family's rent based on 10% of their monthly income, 30% of their adjusted monthly income, the welfare rent, or the minimum rent. Under the formula method, rents may be capped by a ceiling rent. Under this method, the family's income is evaluated at least annually.

Full-Time Student: A person who is carrying a subject load that is considered full-time for day students under the standards and practices of the educational institution attended. An educational institution includes a vocational school with a diploma or certificate program, as well as an institution offering a college degree. (24 CFR 5.603(d))

Head of Household: The adult member of the family who is the head of the household for purposes of determining income eligibility and rent. (24 CFR 5.504(b))

Household Members: All members of the household including members of the family, live-in aides, foster children, and foster adults. All household members are listed on the lease, and no one other than household members are listed on the lease.

Housing Assistance Plan: A housing plan that is submitted by a unit of general local government and approved by HUD as being acceptable under the standards of 24 CFR 570.

Imputed Income: For households with net family assets of more than \$5,000, the amount calculated by multiplying net family assets by a HUD-specified percentage. If imputed income is more than actual income from assets, the imputed amount is used as income from assets in determining annual income.

In-Kind Payments: Contributions other than cash made to the family or to a family member in exchange for services provided or for the general support of the family (e.g., groceries provided on a weekly basis, baby sitting provided on a regular basis).

Interim (examination): A reexamination of a family income, expenses, and household composition conducted between the regular annual recertifications when a change in a household's circumstances warrants such a reexamination.

Live-In Aide: A person who resides with one or more elderly persons, near-elderly persons, or persons with disabilities and who:

- A. Is determined to be essential to the care and well-being of the persons;
- B. Is not obligated for the support of the persons; and
- C. Would not be living in the unit except to provide the necessary supportive services. (24 CFR 5.403(b))

Low-Income Families: Those families whose incomes do not exceed 80% of the median income for the area, as determined by the Secretary with adjustments for smaller and larger families, except that the Secretary may establish income ceilings higher or lower than 80% of the median for the area on the

basis of the Secretary's findings that such variations are necessary because of prevailing levels of construction costs or unusually high or low family incomes. (1937Act)

Medical Expenses: Medical expenses (of all family members of an elderly or disabled family), including medical insurance premiums, that are anticipated during the period for which annual income is computed and that are not covered by insurance. (24 CFR 5.603(d)). These expenses include, but are not limited to, prescription and non-prescription drugs, costs for doctors, dentists, therapists, medical facilities, care for a service animals, transportation for medical purposes.

Mixed Family: A family whose members include those with citizenship or eligible immigration status and those without citizenship or eligible immigration status. (24 CFR 5.504(b))

Monthly Adjusted Income: One twelfth of adjusted income. (24 CFR 5.603(d))

Monthly Income: One twelfth of annual income. (24 CFR 5.603(d))

National: A person who owes permanent allegiance to the United States, for example, as a result of birth in a United States territory or possession. (24 CFR 5.504(b))

Near-Elderly Family: A family whose head, spouse, or sole member is a person who is at least 50 years of age but below the age of 62; 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. (24 CFR 5.403(b))

Net Family Assets:

- A. Net cash value after deducting reasonable costs that would be incurred in disposing of real property, savings, stocks, bonds, and other forms of capital investment, excluding interests in Indian trust land and excluding equity accounts in HUD homeownership programs. The value of necessary items of personal property such as furniture and automobiles shall be excluded.
- B. In cases where a trust fund has been established and the trust is not revocable by, or under the control of, any member of the family or household, the value of the trust fund will not be considered an asset so long as the fund continues to be held in trust. Any income distributed from the trust fund shall be counted when determining annual income.
- C. In determining net family assets, housing authorities or owners, as applicable, shall include the value of any business or family assets disposed of by an applicant or tenant for less than fair market value (including a disposition in trust, but not in a foreclosure or bankruptcy sale) during the two years preceding the date of application for the program or reexamination, as applicable, in excess of the consideration received therefor. In the

case of a disposition as part of a separation or divorce settlement, the disposition will not be considered to be for less than fair market value if the applicant or tenant receives important consideration not measurable in dollar terms. (24 CFR 5.603(d))

Non-Citizen: A person who is neither a citizen nor national of the United States. (24 CFR 5.504(b))

Occupancy Standards: The standards that a housing authority establishes for determining the appropriate number of bedrooms needed to house families of different sizes or composition.

Person with Disabilities: A person who:

A. Has a disability as defined in Section 223 of the Social Security Act, which states:

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

In the case of an individual who attained the age of 55 and is blind and unable by reason of such blindness to engage in substantial, gainful activity requiring skills or ability comparable to those of any gainful activity in which he has previously engaged with some regularity and over a substantial period of time."

B. Is determined, pursuant to regulations issued by the Secretary, to have a physical, mental, or emotional impairment that:

1. Is expected to be of long-continued and indefinite duration;
2. Substantially impedes his or her ability to live independently; and
3. Is of such a nature that such ability could be improved by more suitable housing conditions, or

C. Has a developmental disability as defined in Section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act, which states:

"Severe chronic disability that:

1. Is attributable to a mental or physical impairment or combination of mental and physical impairments;
2. Is manifested before the person attains age 22;

3. Is likely to continue indefinitely;
4. Results in substantial functional limitation in three or more of the following areas of major life activity: (1) self care, (2) receptive and responsive language, (3) learning, (4) mobility, (e) self-direction, (6) capacity for independent living, and (7) economic self-sufficiency; and
5. Reflects the person's need for a combination and sequence of special, interdisciplinary, or generic care, treatment, or other services that are of lifelong or extended duration and are individually planned and coordinated."

This definition does not exclude persons who have the disease of acquired immunodeficiency syndrome or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome. (1937 Act)

No individual shall be considered to be a person with disabilities for purposes of eligibility solely based on any drug or alcohol dependence.

Proration of Assistance: The reduction in a family's housing assistance payment to reflect the proportion of family members in a mixed family who are eligible for assistance. (24 CFR5.520)

Public Housing Agency (BHA/WCHA): Any State, county, municipality, or other governmental entity or public body (or agency or instrumentality thereof) which is authorized to engage in or assist in the development or operation of low-income housing under the 1937 Housing Act. (24 CFR 5.100)

Recertification: The annual reexamination of a family's income, expenses, and composition to determine the family's rent.

Remaining Member of a Tenant Family: A member of the family listed on the lease who continues to live in the public housing dwelling after all other family members have left. (Handbook 7565.1 REV-2, 3-5b.)

Self-Declaration: A type of verification statement by the tenant as to the amount and source of income, expenses, or family composition. Self-declaration is acceptable verification only when third-party verification or documentation cannot be obtained.

Shelter Allowance: That portion of a welfare benefit (e.g., TANF) that the welfare agency designates to be used for rent and utilities.

Single Person: Someone living alone or intending to live alone who does not qualify as an elderly family, a person with disabilities, a displaced person, or the remaining member of a tenant family. (Public Housing: Handbook 7465.1 REV-2, 3-5)

State Wage Information Collection Agency (SWICA): The State agency receiving quarterly wage reports from employers in the State or an alternative system that has been determined by the Secretary of Labor to be as effective and timely in providing employment-related income and eligibility information. (24 CFR 5.214)

Temporary Assistance to Needy Families (TANF): The program that replaced the Assistance to Families with Dependent Children (AFDC) that provides financial assistance to needy families who meet program eligibility criteria. Benefits are limited to a specified time period.

Tenant: The person or family renting or occupying an assisted dwelling unit. (24 CFR 5.504(b))

Tenant Rent: The amount payable monthly by the family as rent to the housing authority. Where all utilities (except telephone) and other essential housing services are supplied by the housing authority or owner, tenant rent equals total tenant payment. Where some or all utilities (except telephone) and other essential housing services are supplied by the housing authority 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(d))

Third-Party (verification): Written or oral confirmation of a family's income, expenses, or household composition provided by a source outside the household.

Total Tenant Payment (TTP):

- A. Total tenant payment for families whose initial lease is effective on or after August 1, 1982:
 - 1. Total tenant payment is the amount calculated under Section 3(a)(1) of the 1937 Act which is the higher of :
 - a. 30% of the family's monthly adjusted income;
 - b. 10% of the family's monthly income; or
 - c. If the family is receiving payments for welfare assistance from a public agency and a part of such payments, adjusted in accordance with the family's actual housing costs, is specifically designated by such agency to meet the family's housing costs, the portion of such payments which is so designated.

If the family's welfare assistance is ratably reduced from the standard of need by applying a percentage, the amount calculated under section 3(a)(1) shall be the amount resulting from one application of the percentage.

2. Total tenant payment for families residing in public housing does not include charges for excess utility consumption or other miscellaneous charges.
- B. Total tenant payment for families residing in public housing whose initial lease was effective before August 1, 1982: Paragraphs (b) and (c) of 24 CFR 913.107, as it existed immediately before November 18, 1996), will continue to govern the total tenant payment of families, under a public housing program, whose initial lease was effective before August 1, 1982.

Utility Allowance: If the cost of utilities (except telephone) and other housing services for an assisted unit is not included in the tenant rent but is the responsibility of the family occupying the unit, an amount equal to the estimate made by a housing authority of the monthly cost of a reasonable consumption of such utilities and other services for the unit by an energy-conservative household of modest circumstances consistent with the requirements of a safe, sanitary, and healthful living environment. (24 CFR 5.603)

Utility Reimbursement: The amount, if any, by which the utility allowance for the unit, if applicable, exceeds the total tenant payment for the family occupying the unit. (24 CFR 5.603)

Very Low-Income Families: Low-income families whose incomes do not exceed 50% of the median family income for the area, as determined by the Secretary with adjustments for smaller and larger families, except that the Secretary may establish income ceilings higher or lower than 50% of the median for the areas on the basis of the Secretary's findings that such variations are necessary because of unusually high or low family incomes. Such ceilings shall be established in consultation with the Secretary of Agriculture for any rural area, as defined in Section 520 of the Housing Act of 1949, taking into account the subsidy characteristics and types of programs to which such ceilings apply. (1937 Act)

Welfare Assistance: Welfare or other payments to families or individuals, based on need, that are made under programs funded by Federal, State or local governments. (24 CFR 5.603(d))

Welfare Rent: In "as-paid" welfare programs, the amount of the welfare benefit designated for shelter and utilities.

ACRONYMS

ACC	Annual Contributions Contract
CFR	Code of Federal Regulations
FSS	Family Self Sufficiency (program)
HCDA	Housing and Community Development Act
HQS	Housing Quality Standards
HUD	Department of Housing and Urban Development
INS	(U.S.) Immigration and Naturalization Service
NAHA	(Cranston-Gonzalez) National Affordable Housing Act
NOFA	Notice of Funding Availability
OMB	(U.S.) Office of Management and Budget
BHA/WCHA	Public Housing Agency
QHWR	Quality Housing and Work Responsibility Act of 1998
SSA	Social Security Administration
TTP	Total Tenant Payment

APPENDIX I: ADDENDUM FOR PROGRAM INTEGRITY

PROGRAM INTEGRITY ADDENDUM

INTRODUCTION

The US Department of HUD conservatively estimates that 200 million dollars is paid annually to program participants who falsify or omit material facts in order to gain more rental subsidy than they are entitled to under the law. HUD further estimates that 12% of all HUD-assisted families are either totally ineligible, or are receiving benefits that exceed their legal entitlement. The BHA/WCHA is committed to assure that the proper level of benefits is paid to all tenants, and that housing resources reach only income-eligible families so that program integrity can be maintained.

The BHA/WCHA will take all steps necessary to prevent fraud, waste, and mismanagement so that program resources are utilized judiciously.

This Chapter outlines the BHA/WCHA's policies for the prevention, detection and investigation of program abuse and tenant fraud.

A. CRITERIA FOR INVESTIGATION OF SUSPECTED ABUSE AND FRAUD

Under no circumstances will the BHA/WCHA undertake an inquiry or an audit of a tenant family arbitrarily. The BHA/WCHA's expectation is that tenant families will comply with HUD requirements, provisions of the lease, and other program rules. The BHA/WCHA staff will make every effort (formally and informally) to orient and educate all families in order to avoid unintentional violations. However, the BHA/WCHA has a responsibility to HUD, to the Community, and to eligible families in need of housing assistance, to monitor tenants' lease obligations for compliance and, when indicators of possible abuse come to the BHA/WCHA's attention, to investigate such claims.

The BHA/WCHA will initiate an investigation of a tenant family only in the event of one or more of the following circumstances:

Referrals, Complaints, or Tips. The BHA/WCHA will follow up on referrals from other agencies, companies or persons which are received by mail, by telephone or in person, which allege that a tenant family is in non-compliance with, or otherwise violating the lease or the program rules. Such follow-up will be made providing that the referral contains at least one item of information that is independently verifiable. A copy of the allegation will be retained in the tenant file.

Internal File Review. A follow-up will be made if BHA/WCHA staff discovers (as a function of a [re]certification, an interim redetermination, or a quality control review), information or facts which conflict with previous file data, the BHA/WCHA's knowledge of the family, or is discrepant with statements made by the family.

Verification or Documentation. A follow-up will be made if the BHA/WCHA receives independent verification or documentation which conflicts with representations in the tenant file (such as public record information or credit bureau reports, reports from other agencies).

B. STEPS THE BHA/WCHA WILL TAKE TO PREVENT PROGRAM ABUSE AND FRAUD

The management and occupancy staff will utilize various methods and practices (listed below) to prevent program abuse, non-compliance, and willful violations of program rules by applicants and tenant families. This policy objective is to establish confidence and trust in the management by emphasizing education as the primary means to obtain compliance by tenant families.

Resident Counseling. The BHA/WCHA will routinely provide tenant counseling as a part of every recertification interview in order to clarify any confusion pertaining to program rules and requirements.

Review and explanation of Forms. Staff will explain all required forms and review the contents of all (re)certification documents prior to signature.

Tenant Certification. All family representatives will be required to sign a "Tenant Certification" form, as contained in HUD's Tenant Integrity Program Manual.

C. STEPS THE BHA/WCHA WILL TAKE TO DETECT PROGRAM ABUSE AND FRAUD

The BHA/WCHA Staff will maintain a high level of awareness to indicators of possible abuse and fraud by assisted families.

Observation. The BHA/WCHA Management and Occupancy Staff (to include maintenance personnel) will maintain high awareness of circumstances which may indicate program abuse or fraud, such as unauthorized persons residing in the household and unreported income.

Public Record Bulletins may be reviewed by Management and Staff.

D. THE BHA/WCHA'S HANDLING OF ALLEGATIONS OF POSSIBLE ABUSE AND FRAUD

The BHA/WCHA staff will encourage all tenant families to report suspected abuse to Director of Housing Programs. All such referrals, as well as referrals from community members and other agencies, will be thoroughly documented and placed in the tenant file. All allegations, complaints and tips will be carefully evaluated in order to determine if they warrant follow-up. The HA will not follow up on allegations which are vague or otherwise non-specific. The HA will only review allegations which contain one or more independently verifiable facts.

File Review. An internal file review will be conducted to determine:

If the subject of the allegation is a tenant of the BHA/WCHA and, if so, to determine whether or not the information reported has been previously disclosed by the family.

It will then be determined if the BHA/WCHA is the most appropriate authority to do a follow-up (more so than police or social services). Any file documentation of past behavior as well as corroborating complaints will be evaluated.

Conclusion of Preliminary Review. If at the conclusion of the preliminary file review there is/are fact(s) contained in the allegation which conflict with file data, and the fact(s) are independently verifiable, the Director of Housing Programs will initiate an investigation to determine if the allegation is true or false.

E. HOW THE BHA/WCHA WILL INVESTIGATE ALLEGATIONS OF ABUSE AND FRAUD

If the BHA/WCHA determines that an allegation or referral warrants follow-up, either the staff person who is responsible for the file or a person designated by the Executive Director to monitor the program compliance will conduct the investigation. The steps taken will depend upon the nature of the allegation and may include, but are not limited to, the items listed below. In all cases, the BHA/WCHA will secure the written authorization from the program participant for the release of information.

Credit Bureau Inquiries. In cases involving previously unreported income sources, a CBI inquiry may be made to determine if there is financial activity which conflicts with the reported income of the family.

Verification of Credit. In cases where the financial activity conflicts with file data, a Verification of Credit form may be mailed to the creditor in order to determine the unreported income source.

Employers and Ex-Employers. Employers or ex-employers may be contacted to verify wages which may have been previously undisclosed or misreported.

Neighbors/Witnesses. Neighbors and/or other witnesses may be interviewed who are believed to have direct or indirect knowledge of facts pertaining to the BHA/WCHA's review.

Other Agencies. Investigators, case workers or representatives of other benefit agencies may be contacted.

Public Records. If relevant, the BHA/WCHA will review public records kept in any jurisdictional courthouse. Examples of public records which may be checked are: real estate, marriage, divorce, uniform commercial code financing statements, voter registration, judgments, court or police records, state wage records, utility records and postal records.

Interviews with Head of Household or Family Members. The BHA/WCHA will discuss the allegation (or details thereof) with the Head of Household or family member by scheduling an appointment at the appropriate BHA/WCHA office. A high standard of courtesy and professionalism will be maintained by the BHA/WCHA Staff Person who conducts such interviews. Under no circumstances will inflammatory language, accusation, or any unprofessional conduct or language be tolerated by the management. If possible, an additional staff person will attend such interviews.

F. PLACEMENT OF DOCUMENTS, EVIDENCE AND STATEMENTS OBTAINED BY THE BHA/WCHA

Documents and other evidence obtained by the BHA/WCHA during the course of an investigation will be considered "work product" and will either be kept in the tenant file, or in a separate "work file." In either case, the tenant file or work file shall be kept in a secure location. Such cases under review will not be discussed among BHA/WCHA Staff unless they are involved in the process, or have information which may assist in the investigation.

G. CONCLUSION OF THE BHA/WCHA'S INVESTIGATIVE REVIEW

At the conclusion of the investigative review, the reviewer will report the findings to the Executive Director or designee. It will then be determined whether a violation has occurred, a violation has not occurred, or if the facts are inconclusive.

H. EVALUATION OF THE FINDINGS

If it is determined that a program violation has occurred, the BHA/WCHA will review the facts to determine:

The type of violation. (Procedural, non-compliance, fraud.)

Whether the violation was intentional or unintentional.

What amount of money (if any) is owed by the tenant.

Is the family eligible for continued occupancy.

I. ACTION PROCEDURES FOR VIOLATIONS WHICH HAVE BEEN DOCUMENTED

Once a program violation has been documented, the BHA/WCHA will propose the most appropriate remedy based upon the type and severity of the violation.

Procedural Non-compliance

This category applies when the tenant "fails to" observe a procedure or requirement of the BHA/WCHA , but does not misrepresent a material fact, and there is no retroactive rent owed by the family. Examples of non-compliance violations are:

Failure to appear at a pre-scheduled appointment.

Failure to return verification in time period specified by the BHA/WCHA .

Warning Notice to the Family. In such cases a notice will be sent to the family which contains the following:

A description of the non-compliance and the procedure, policy or obligation which was violated.

The date by which the violation must be corrected, or the procedure complied with.

The action which will be taken by the BHA/WCHA if the procedure or obligation is not complied with by the date specified by the BHA/WCHA.

The consequences of repeated (similar) violations.

Intentional Misrepresentations

When a tenant falsifies, misstates, omits or otherwise misrepresents a material fact which results (or would have resulted) in an underpayment of rent by the tenant, the BHA/WCHA will evaluate whether or not:

the tenant had knowledge that his/her actions were wrong, and

that the tenant willfully violated the lease or the law.

Knowledge that the action or inaction was wrong. This will be evaluated by determining if the tenant was made aware of program requirements and prohibitions. The tenant's signature on various certification, briefing certificate, Personal Declaration and *Things You Should Know* are adequate to establish knowledge of wrong-doing.

The tenant willfully violated the law. Any of the following circumstances will be considered adequate to demonstrate willful intent:

An admission by the tenant of the misrepresentation.

That the act was done repeatedly.

If a false name or Social Security Number was used.

If there were admissions to others of the illegal action or omission.

That the tenant omitted material facts which were known to them (e.g., employment of self or other household member).

That the tenant falsified, forged or altered documents.

That the tenant uttered and certified to statements at a rent (re)determination which were later independently verified to be false.

Dispositions of Cases Involving Misrepresentations

In all cases of misrepresentations involving efforts to recover moneys owed, the BHA/WCHA may pursue, depending upon its evaluation of the criteria stated above, one or more of the following actions:

Criminal Prosecution: If the BHA/WCHA has established criminal intent, and the case meets the criteria for prosecution, the BHA/WCHA may:

Refer the case to the local State or District Attorney, notify HUD's RIGI, and terminate rental assistance.

Administrative Remedies: The BHA/WCHA may:

Terminate tenancy and demand payment of restitution in full.

Terminate tenancy and execute an administrative repayment agreement in accordance with the BHA/WCHA's Repayment Policy.

Terminate tenancy and pursue restitution through civil litigation.

Permit continued occupancy at the correct rent and execute an administrative repayment agreement in accordance with the BHA/WCHA's repayment policy.

Public Housing Drug Elimination Program Plan

Whatcom County Housing Authority

Note: THIS PHDEP Plan template (HUD 50075-PHDEP Plan) is to be completed in accordance with Instructions located in applicable PIH Notices.

Annual PHDEP Plan Table of Contents:

1. General Information/History
2. PHDEP Plan Goals/Budget
3. Milestones
4. Certifications

Section 1: General Information/History

- A. Amount of PHDEP Grant \$ 25,000
- B. Eligibility type (Indicate with an "x") N1 x N2 _____ R _____
- C. FFY in which funding is requested beginning October 1, 2000
- D. Executive Summary of Annual PHDEP Plan

In the space below, provide a brief overview of the PHDEP Plan, including highlights of major initiatives or activities undertaken. It may include description of the expected outcomes. The summary must not be more than five (5) sentences long

The housing authority plans to provide access to established drug prevention programs for its residents.

E. Target Areas

Complete the following table by indicating each PHDEP Target Area (development or site where activities will be conducted), the total number of units in each PHDEP Target Area, and the total number of individuals expected to participate in PHDEP sponsored activities in each Target Area

PHDEP Target Areas (Name of development(s) or site)	Total # of Units within the PHDEP Target Area(s)	Total Population to be Served within the PHDEP Target Area(s)
All developments	63	229

F. Duration of Program

Indicate the duration (number of months funds will be required) of the PHDEP Program proposed under this Plan (place an "x" to indicate the duration of program by # of months. For "Other", identify the # of months).

6 Months _____ 12 Months x 18 Months _____ 24 Months _____ Other _____

G. PHDEP Program History

Indicate each FY that funding has been received under the PHDEP Program (place an “x” by each applicable Year) and provide amount of funding received. If previously funded programs have not been closed out at the time of this submission, indicate the fund balance and anticipated completion date. For grant extensions received, place “GE” in column or “W” for waivers.

Fiscal Year of Funding	PHDEP Funding Received	Grant #	Fund Balance as of Date of this Submission	Grant Extensions or Waivers	Anticipated Completion Date
FY 1995	0				
FY 1996	0				
FY 1997	0				
FY 1998	0				
FY 1999	0				

Section 2: PHDEP Plan Goals and Budget

A. PHDEP Plan Summary

In the space below, summarize the PHDEP strategy to address the needs of the target population/target area(s). Your summary should briefly identify: the broad goals and objectives, the role of plan and your system or process for monitoring and evaluating PHDEP-funded activities. This summary should not exceed 5-10 sentences.

This is the first year of funding for the WCHA. It will fund the urgent need to provide transportation for children and adult residents of the housing authority. Future grants will broaden the program through increased criminal background checks and other prevention and police services.

B. PHDEP Budget Summary

Enter the total amount of PHDEP funding allocated to each line item.

FY _____ PHDEP Budget Summary	
Budget Line Item	Total Funding
9110 - Reimbursement of Law Enforcement	
9120 - Security Personnel	
9130 - Employment of Investigators	5,500
9140 - Voluntary Tenant Patrol	
9150 - Physical Improvements	5,565
9160 - Drug Prevention	10,000
9170 - Drug Intervention	
9180 - Drug Treatment	
9190 - Other Program Costs	3,935
TOTAL PHDEP FUNDING	25,000

C. PHDEP Plan Goals and Activities

In the tables below, provide information on the PHDEP strategy summarized above by budget line item. Each goal and objective should be listed sequentially for each budget line item (where applicable). Use as many rows as necessary to list proposed activities (additional rows may be added in the tables). PHAs are not required to provide information in shaded boxes. Information provided must be concise—not to exceed two sentences in any column. Tables for line items in which the PHA has no planned goals or activities may be deleted.

9190 - Other Program Costs					Total PHDEP Funds: \$ 25,000		
Goal(s)	Provide transportation to prevention activities						
Objectives	Purchase passenger van						
Proposed Activities	# of Persons Served	Target Population	Start Date	Expected Complete Date	PHDEP Funding	Other Funding (Amount /Source)	Performance Indicators
1. Prorate van purchase			10-1-00	3-1-01	3,000	25,000 1999 PHDEP	Van purchased by date specified
2. Prorate M.I.S position			10-1-00	9-30-01	935	6,000 1999 BHA PHDEP	Provide Management Information System support to tract criminal activity in public housing
3.							

Section 3: Expenditure/Obligation Milestones

Indicate by Budget Line Item and the Proposed Activity (based on the information contained in Section 2 PHDEP Plan Budget and Goals), the funds that will be expended (at least 25% of the total grant award) and obligated (at least 50% of the total grant award) within 12 months of grant execution.

Budget Line Item #	25% Expenditure of Total Grant Funds By Activity #	Total PHDEP Funding Expended (sum of the activities)	50% Obligation of Total Grant Funds by Activity #	Total PHDEP Funding Obligated (sum of the activities)
<i>e.g Budget Line Item # 9120</i>	<i>Activities 1, 3</i>		<i>Activity 2</i>	
9110				
9120				
9130	Employment of Investigator	5,500	100%	5,500
9140				
9150	Physical Improvements security equipment	5,565	100%	5,565
9160	Drug Prevention	10,000	100%	10,000

	Boys and Girls Club			
9170				
9180				
9190	M.I.S. support and prorated purchase of van for Boys and Girls Club	3935	100%	3,935
TOTAL		\$ 25,000		\$ 25,000

Section 4: Certifications

A comprehensive certification of compliance with respect to the PHDEP Plan submission is included in the “PHA Certifications of Compliance with the PHA Plan and Related Regulations.”

Definition of Substantial Change to the Agency Plan

wa041d01

A Substantial Change is any fundamental alteration of the agency's Mission or Goals and Objectives as determined by the Board of Commissioners. Any such change will be subject to all the review and approval requirements of the original Agency Plan as per HUD regulations.

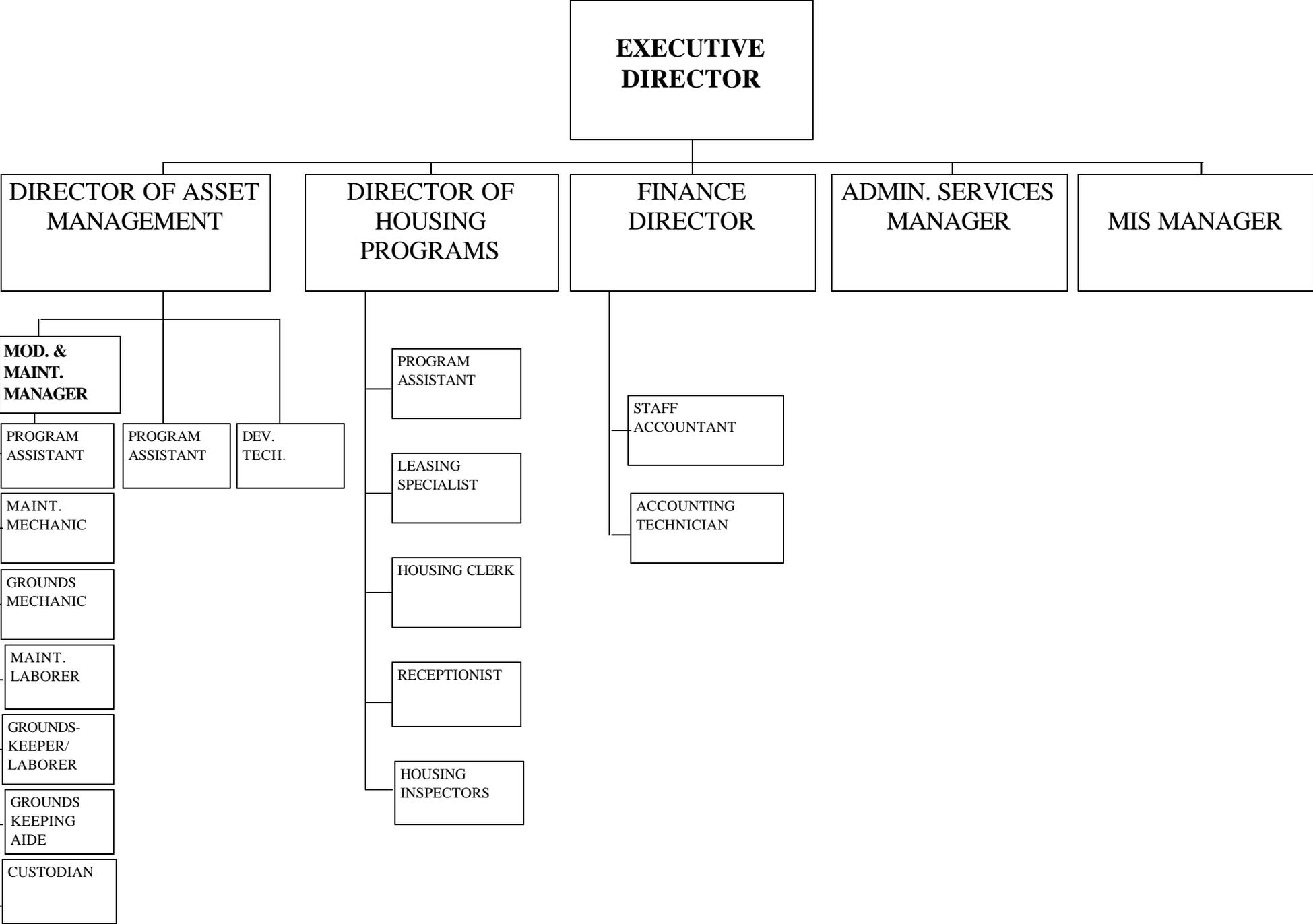
ERATING BUDGET >>>>>>	
TOTAL	TOTAL
BHA-LF	BHA
454	1916
2,784,264	3,898,656
58,200	61,401
116,570	134,621
145,700	245,754
0	844,527
0	6,210
0	5,494,657
0	21,563
31,239	57,410
252,694	252,694
0	7,867
0	0
3,388,667	11,025,360
212,327	769,376
7,550	14,000
10,470	33,871
5,566	29,721
9,765	40,685
0	72,132
11,365	56,569
124,368	163,206
27,360	49,041
8,040	9,536
15,500	50,722
13,800	20,000
3,100	6,295
3,900	21,213
125	5,125
0	40,483
210,804	333,204
215,528	491,551
99,232	431,761
43,380	110,107
242,788	427,695
35,250	104,539
41,504	81,558
3,960	3,960
5,327	22,582
170,364	434,389
0	16,000
1,000	20,175
0	5,292,118
1,522,373	9,151,614
0	0
0	0
82,565	82,565
1,505,578	1,505,578
20,950	28,817
1,609,093	1,616,960
3,131,466	10,768,574
257,201	256,786
579,207	1,073,293
257,201	256,786
836,408	1,330,079
n/a	n/a

<<< HOUSING AUTHORITY OF WHATCOM COUNTY - FISCAL YEAR 2000 OPERATING BUDGET >>>					
	< HUD >		<<< FmHA >>>		TOTAL
	CONV LRPB	EVERSON	SUMAS Sq	WCHA-LF	WCHA
DWELLING UNITS AVAILABLE>	63	24	11	MGMT	98
REVENUES/CASH SOURCES					
RENTAL INCOME	130,093	128,686	39,600	134,427	432,806
EXCESS UTILITIES	1,854				1,854
INTEREST INCOME	5,960	700	900	230	7,790
OTHER INCOME	7,993	6,700	645		15,338
OPERATG 92.5%/ADMIN/GRANT SUBSIDIES	134,671				134,671
HARD TO HOUSE FEES					0
HAP & CAPITAL GRANT SUBSIDIES	45,000				45,000
AUDIT SUBSIDY					0
MANAGEMENT FEES				16,014	16,014
DEVELOPER'S FEES					0
EQUITY/CAPITAL CONTRIBUTIONS		17,600			17,600
DEBT PROCEEDS					0
TOTAL RECEIPTS	325,571	153,686	41,145	150,671	671,073
EXPENSES					
ADMINISTRATIVE SALARIES	52,876			31,803	84,679
LEGAL EXPENSE	900	500		250	1,650
STAFF TRAINING	1,453			1,178	2,631
TRAVEL EXPENSES	1,110			1,110	2,220
AUDIT EXPENSE	2,495	1,522	370	805	5,192
OFFICE RENT	3,300			3,228	6,528
SUNDRY ADMIN -OTHER	3,290			1,750	5,040
SUNDRY ADMIN-FISCAL/MGT AGENT		12,648	3,366		16,014
SUNDRY ADMIN-TELEPHONE	1,500			1,200	2,700
SUNDRY ADMIN-PUBLICATIONS	100			50	150
SUNDRY-OFFICE SUPPLIES	1,800	50	20	1,750	3,620
SUNDRY-MARKETING		1,000	1,000		2,000
SUNDRY-MEMBERSHIPS & FEES	250			125	375
SUNDRY-COMPUTER SUPPORT	1,500			725	2,225
SUNDRY-COLLECT & COURT COSTS	2,800				2,800
TENANT SERVICES SALARIES	0	2,870	1,545		4,415
TEN SVCS-PUBLICATIONS & CONTRACTS		6,000			6,000
UTILITIES	61,253	32,500	6,475		100,228
MAINTENANCE LABOR	53,178	15,435	5,376		73,989
MAINTENANCE MATERIALS	11,578	2,100	850		14,528
MAINTENANCE CONTRACTS	35,305	5,000	2,100		42,405
PROTECTIVE SERVICES					0
INSURANCE	4,878	2,990	765	280	8,913
PILOT/TAXES	800	4,058	169		5,027
TERMINAL LEAVE PAYMENTS	1,700			150	1,850
BENEFIT CONTRIBUTIONS	30,358	4,877	1,808	9,131	46,174
COLLECTION LOSSES	10,000	1,500	240		11,740
OTHER GENERAL EXPENSE	225	100	100		425
HOUSING PAYMENTS					0
TOTAL ROUTINE EXPENSES	282,649	93,150	24,184	53,535	453,518
NONROUTINE/CAPITAL EXPENDITURES					
EXTRAORDINARY MAINTENANCE					0
REPLACEMENT OF EQUIPMENT					0
BETTRM'TS, ADDS, REHAB & DEVELOPMENT	37,013	17,600			54,613
DEBT SERVICE PAYMENTS		21,936	7,828	116,893	146,657
RESERVE PAYMENTS		21,000	3,070		24,070
TOTAL NONROUTINE EXPENSES	37,013	60,536	10,898	116,893	225,340
TOTAL EXPENDITURES	319,662	153,686	35,082	170,428	678,858
RESIDUAL RECEIPTS/DEFICIT					
BEFORE PROV. FOR RESERVES:	5,909	0	6,063	(19,757)	(7,785)
OPERATING RESERVE	82,113	27,556	36,522	18,377	164,568
PROVISION FOR FUND RES.	133,321	0	6,063	(19,757)	119,627
PROJ. RESERV @ YR-END	215,434	27,556	42,585	(1,380)	284,195
(OP RSRV %) & (INCOME:DEBT RATIOS)	76.22%	n/a	n/a	n/a	n/a

CAPITAL HUD GRANT MODERNIZATION BUDGETS - FISCAL YEAR 2000						
	BHA CGP	BHA CGP	BHA CGP	BHA CGP	WCHA	TOTAL
	706-97-OS	707-98	708-99	08-99-OS	CIAP 908910	HUD MOD
DWELLING UNITS AVAILABLE						
REVENUES/CASH SOURCES						
RENTAL INCOME						0
EXCESS UTILITIES						0
INTEREST INCOME						0
OTHER INCOME						0
OPERATG 92.5%/ADMIN/GRANT SUBSIDIES	7,722	403,545	624,736	24,928	141,284	1,202,215
HARD TO HOUSE FEES						0
HAP SUBSIDY						0
AUDIT SUBSIDY						0
MANAGEMENT FEES						0
DEVELOPER'S FEES						0
EQUITY/CAPITAL CONTRIBUTIONS						0
DEBT PROCEEDS						0
TOTAL RECEIPTS	7,722	403,545	624,736	24,928	141,284	1,202,215
EXPENSES						
ADMINISTRATIVE SALARIES	1,230	17,448	48,370	19,380	10,859	97,287
LEGAL EXPENSE						0
STAFF TRAINING						0
TRAVEL EXPENSES						0
AUDIT EXPENSE						0
OFFICE RENT						0
SUNDRY ADMIN -OTHER						0
SUNDRY ADMIN-FISCAL/MGT AGENT						0
SUNDRY ADMIN -TELEPHONE						0
SUNDRY ADMIN-PUBLICATIONS						0
SUNDRY-OFFICE SUPPLIES						0
SUNDRY-MARKETING						0
SUNDRY-MEMBERSHIPS & FEES						0
SUNDRY-COMPUTER SUPPORT						0
SUNDRY-COLLECT & COURT COSTS						0
TENANT SERVICES SALARIES						0
TENANT SERVICES-CONTRACTS						0
UTILITIES						0
MAINTENANCE LABOR						0
MAINTENANCE MATERIALS						0
MAINTENANCE CONTRACTS						0
PROTECTIVE SERVICES						0
INSURANCE						0
PILOT/TAXES						0
TERMINAL LEAVE PAYMENTS						0
BENEFIT CONTRIBUTIONS	352	4,994	13,846	5,548	3,108	27,848
COLLECTION LOSSES						0
OTHER GENERAL EXPENSE						0
HOUSING PAYMENTS						0
TOTAL ROUTINE EXPENSES	1,582	22,442	62,216	24,928	13,967	125,135
NONROUTINE/CAPITAL EXPENDITURES						
EXTRAORDINARY MAINTENANCE						0
REPLACEMENT OF EQUIPMENT						0
BETTRM'TS, ADDS, REHAB & DEVELOPMENT	6,140	381,103	562,520		127,317	1,077,080
DEBT SERVICE PAYMENTS						0
RESERVE PAYMENTS						0
TOTAL NONROUTINE EXPENSES	6,140	381,103	562,520	0	127,317	1,077,080
TOTAL EXPENDITURES	7,722	403,545	624,736	24,928	141,284	1,202,215
RESIDUAL RECEIPTS/DEFICIT						
BEFORE PROV. FOR RESERVES:	0	0	0	0	0	0
OPERATING RESERVE						
PROVISION FOR FUND RES.						
PROJ. RESERV @ YR-END						
OP RSRV / MAX OP RSRV						

BHA & WCHA FY 2000	GRAND
	TOTAL
	BUDGET
DWELLING UNITS AVAILABLE>	2,014
REVENUES/CASH SOURCES	
RENTAL INCOME	4,331,462
EXCESS UTILITIES	63,255
INTEREST INCOME	142,411
OTHER INCOME	261,092
OPERAT'G/ADMIN/DEBT/GRANT SUBSIDIES	2,181,413
HARD TO HOUSE FEES	6,210
HAP SUBSIDY	5,539,657
AUDIT SUBSIDY	21,563
MANAGEMENT FEES	73,424
DEVELOPER'S FEES	252,694
EQUITY/CAPITAL CONTRIBUTIONS	25,467
DEBT PROCEEDS	0
TOTAL RECEIPTS	12,898,648
EXPENSES	
ADMINISTRATIVE SALARIES	951,342
LEGAL EXPENSE	15,650
STAFF TRAINING	36,502
TRAVEL EXPENSES	31,941
AUDIT EXPENSE	45,877
OFFICE RENT	78,660
SUNDRY ADMIN -OTHER	61,609
SUNDRY ADMIN-FISCAL/MGT AGENT	179,220
SUNDRY ADMIN-TELEPHONE	51,741
SUNDRY ADMIN-PUBLICATIONS	9,686
SUNDRY-OFFICE SUPPLIES	54,342
SUNDRY-MARKETING	0
SUNDRY-MEMBERSHIPS & FEES	6,670
SUNDRY-COMPUTER SUPPORT	23,438
SUNDRY-COLLECT & COURT COSTS	7,925
TENANT SERVICES SALARIES	44,898
TEN. SVCS-PUBLICATIONS & CONTRACTS	339,204
UTILITIES	591,779
MAINTENANCE LABOR	505,750
MAINTENANCE MATERIALS	124,635
MAINTENANCE CONTRACTS	470,100
PROTECTIVE SERVICES	104,539
INSURANCE	90,471
PILOT/TAXES	8,987
TERMINAL LEAVE PAYMENTS	24,432
BENEFIT CONTRIBUTIONS	508,411
COLLECTION LOSSES	27,740
OTHER GENERAL EXPENSE	20,600
HOUSING PAYMENTS	5,292,118
TOTAL ROUTINE EXPENSES	9,730,267
NONROUTINE/CAPITAL EXPENDITURES	
EXTRAORDINARY MAINTENANCE	0
REPLACEMENT OF EQUIPMENT	0
BETTRM'TS, ADDS, REHAB & DEVELOPMENT	1,214,258
DEBT SERVICE PAYMENTS	1,652,235
RESERVE PAYMENTS	52,887
TOTAL NONROUTINE EXPENSES	2,919,380
TOTAL EXPENDITURES	12,649,647
RESIDUAL RECEIPTS/DEFICIT	
BEFORE PROV. FOR RESERVES:	249,001
OPERATING RESERVE	1,237,861
PROVISION FOR FUND RES.	376,413
PROJ. RESERV @ YR-END	1,614,274
OP RSRV / MAX OP RSRV	

BELLINGHAM/WHATCOM COUNTY HOUSING AUTHORITY



COMMENTS AND RESPONSES TO THE WHATCOM COUNTY HOUSING AUTHORITY AGENCY PLAN

Resident Advisory Board Meeting, June 15, 2000

Comment: Some residents objected to flat rents, stating that they could not afford them.

Response: The Housing Authority staff pointed out, as stated in the earlier notice to residents, that no one is required to choose the flat rents and most people will continue to stay at the 30 percent of income rents.

Comment: A number of elderly and disabled residents stated that the community service requirement should not apply to them.

Response: The residents were advised of the exemption provisions of the community service requirement and were satisfied with the response.

Comment: Indirectly referring to the Authority's pet policy, some residents objected to restricted areas for walking pets.

Response: Residents were advised that certain areas are designated to keep animal waste away from the paved areas in front of the doorways of the buildings.

Resident, Resident Advisory Board, and Public Comments at June 20, 2000, public hearing.

Comment: Residents were concerned about being required to pay flat rents.

Response: Residents were again assured that no one is required to pay a flat rent and they may continue to pay 30 percent of their income for rent.

Comment: A resident objected to the provision in the pet policy requiring the declawing of indoor cats.

Response: The Housing Authority believes this is an appropriate provision to protect the interior of units from excessive damage.

Comment: A legal advocate for residents stated that fair housing should be emphasized in the Agency Plan, federal preferences should be maintained, deconcentration of low incomes should not be emphasized, low income families should

have a preference over working families, and income reviews should be limited to once annually to promote retention of earned income.

Response: The Housing Authority is committed to fair housing and has had few complaints and, when investigated, never has been found at fault. The Housing Authority found that Federal Preferences did not work as intended and has had great success in developing and implementing local preferences for clients referred by local non-profit social service and government agencies. Deconcentration of incomes is a federal requirement, and the Housing Authority must implement it as directed by regulation. The Housing Authority has always housed a vast preponderance of its residents from very low and low-income backgrounds. The number of moderate-income working families is relatively small, although such residents are encouraged as role models for other residents and to provide connections to job information. The Housing Authority will be practicing the “income disregards” for persons moving from unemployment to work. However, the reporting of additional income on an interim basis has been found to be an important ingredient to insure payment of a fair share of rent and fraud prevention.

Comment: A resident asked about the process of criminal background checks for housing applicants.

Response: The process utilizes the local police and State Patrol records for preliminary checks. If an apparent criminal history is uncovered, then fingerprints are requested to access FBI records to disprove or confirm the history.

Comments at the July 11, 2000, Public Hearing

Stephen Gockley, Northwest Justice Project, presented a memo from the Domestic Violence Task Force and asked that the Housing Authority develop a policy concerning domestic violence for both public housing and Section 8. He asked that the following points be included:

- a. Disseminate information and available resources to clients at several times (recertification, lobby posting, etc.)
- b. Pro-active linking with other agencies.
- c. Individualized case handling.
- d. Give specific information when action is going to be taken along with referral to resources.

Elaine Hanson, Womenscare Shelter, presented domestic violence data and information.

Shannon Withrow, Opportunity Council, provides case management for homeless families. She spoke of the plight of domestic violence victims who have lost public housing.

E. D. Bryan, Catholic Community Services, suggested that residents who are domestic violence victims, be given a probationary period before termination to contact services and get the help they need.

Response:

Director Harmon stated that local preferences are available through referrals for domestic violence victims as part of the continuum of care provided by local social service agencies. Unfortunately, not enough referrals are received to utilize all of these preferences. While sensitive to the situations of victims of domestic violence, the Housing Authority also has responsibilities toward neighbors and landlords. Ms. Espinoza noted concern that the Housing Authority has an obligation of privacy for residents.

Chair Keenan asked that the Domestic Violence Task Force continue to work with the Housing Authority to develop a domestic violence policy and to work toward improving the continuum of care approach to housing.

Written Comments from the Domestic Violence Task Force:

The Task Force alleged that the Housing Authority does not have a comprehensive policy on serving victims of domestic violence. However, the group did acknowledge that the Housing Authority has developed an extensive system of preferences for admission of victims of domestic violence. The main complaint seems to be in the area of handling individual cases of domestic abuse and the training of Housing Authority staff in this area.

Response: The Housing Authority does not have a document labeled as a “Comprehensive Policy on Domestic Abuse.” However, it does have an extensive history of accommodating persons in such circumstances and has written policies, procedures and interagency agreements to implement this intent. The Housing Authority has experienced a disappointing lack of referrals from agencies that have written agreements with the Authority, despite phone calls, letters, and meetings to find out why there are not more referrals.

The Housing Authority has been most flexible in approving transfers for domestic violence victims and reversing termination actions upon appeal. However, there are limits to what the Housing Authority can do, since we are not funded or trained as a

social service agency. The Housing Authority has had to evict some families with domestic violence incidents due to repeated disturbances to neighbors.

The Housing Authority is prepared to cooperate in developing a more comprehensive strategy within the limits of its time and resources.

Written Comments from Columbia Legal Services.

Columbia believes that the Housing Authority should be the housing provider of last resort for very low-income families and should serve this group as our highest priority. They also reminded the Authority of their duty to further fair housing.

To assist in serving the very low income, Columbia encouraged the Authority to exceed the minimum federal targeting requirements for low-income residents.

The group encouraged the Housing Authority to expand its already extensive use of local preferences. They asked for an emphasis on homeless families, families fleeing domestic violence, rent-burdened families, and disabled families.

Columbia objected to the process of skipping down the waiting list to find higher-income families to help balance out very low-income projects.

The legal aid group encouraged the Authority to take on optional “income disregards.” They oppose a minimum rent as permitted by federal law.

Columbia objected to our late rent fees as practiced and requiring payments to be made to a mailing address in Seattle.

On the topic of grievances, they stated the applicant is entitled to a taped hearing and that their termination notices should include the telephone number of legal services.

Columbia encouraged the Housing Authority to continue its partnerships with government and non-profit service providers and to gather resident input whenever possible. The establishment and maintenance of a resident advisory board is strongly recommended.

Response:

The Housing Authority disagrees that our primary mission should be a last-resort housing provider. We help many persons who are recovering from personal or financial catastrophe. We see ourselves as part of the continuum of care and work closely with non-profits to provide supportive and affordable housing for many of their

clients. However, we are also committed to upward mobility of our residents and believe this is promoted by an environment of persons from different backgrounds and economic circumstances. We are very committed to fair housing and have very few complaints.

We do not find it necessary to formally exceed the minimum targeting requirements of the federal government. Our primary market has always been very low-income households. However, we wish to leave room in our income targeting for persons succeeding in the welfare-to-work program and other self-empowerment efforts to give the support they need to make transitions to full independence.

The Housing Authority has one of the most extensive uses of local preferences for an agency of its size. We are already serving the groups enumerated in Columbia's list of needy households.

We find that, although HUD has not issued final regulations on income deconcentration, one of the few truly viable tools to accomplish this is the process of skipping down the waiting list. We do not have an undue concentration of very low-income families compared to our overall averages, but that determination will depend on how HUD defines it.

The Housing Authority cannot take optional income disregards unless HUD is willing to fund it. We find that \$50 minimum rents after a utility allowance usually result in a negative rent and believe it is good public policy to have residents bear at least some minimal share of the cost of housing.

Late fees are a standard business practice and help encourage residents to pay on time, improving the financial posture of the Housing Authority.

We will research the appropriateness of taping hearings. We routinely advise clients how to contact legal services but do not find it appropriate to include this in our termination notices.

We will be continuing our strong partnerships with local government and non-profit service providers. Although it has been difficult for residents to maintain a long-term resident association, we have worked closely with residents whenever possible and have regular meetings with them. For the Agency Plan process, we sent out numerous notices and had one general meeting and two public hearings in different locations to gather input.