

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

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# PHA Plan

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

**SPOKANE HOUSING AUTHORITY  
SPOKANE, WASHINGTON  
WA055v02**

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

## PHA Plan Agency Identification

**PHA Name:** Spokane Housing Authority

**PHA Number:** WA055

**PHA Fiscal Year Beginning:** (07/2000)

### 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)  
City & County Community Development Offices

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)  
PHA Local offices

**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)  
*The Spokane Housing Authority is dedicated to increasing safe, affordable housing and providing opportunities for persons experiencing barriers to housing.*

**B. Goals**

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

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

- PHA Goal: Expand the supply of assisted/*affordable* housing  
Objectives:
- Apply for additional rental vouchers *and other tenant-based and project-based resources to reduce the rental housing affordability gap in the SHA service areas: Increase total by approximately 120 per year.*
- Reduce public housing vacancies: *[SHA does not experience high PH vacancies]*
- Leverage private or other public funds to create additional housing opportunities: *Aggressively seek opportunities to use SHA tax-exempt bonding capacity to enhance affordable housing development activities of local non-profit and for-profit entities; Enable development of additional 200 units over the 5-year period.*
- Acquire or build units or developments: *Acquire or build at least 400 units of affordable housing over the 5-year plan period.*
- Other (list below)

- PHA Goal: Improve the quality of assisted/*affordable* housing  
Objectives:
- Improve public housing management: (PHAS score) 96.25%  
***Maintain "High Performer" status as public housing assessment fully transitions from PHMAP to PHAS.***
  - Improve voucher management: (SEMAP score)  
***Achieve and maintain "High Performer" status under new SEMAP, while streamlining the administration of this program so as to optimize use of all available resources.***
  - Increase customer satisfaction: ***Continue to measure customer satisfaction through the conduct of SHA annual surveys.***
  - Concentrate on efforts to improve specific management functions: (list; e.g., public housing finance; voucher unit inspections)  
***Add Finance Director position to fully implement GAAP and achieve/maintain a consistently positive audit position; Implement or refine as necessary an asset inventory system, a coordinated agency-wide procurement process, and a comprehensive risk-management program.***
  - Renovate or modernize public housing units: ***Continue to utilize award-winning life-cycle costing system to efficiently plan for and implement public housing modernization activities.***
  - Demolish or dispose of obsolete public housing:
  - Provide replacement public housing:
  - Provide replacement vouchers:
  - Other: (list below)
- PHA Goal: Increase assisted/*affordable* housing choices  
Objectives:
- Provide voucher mobility counseling: ***Continue to provide voucher mobility counseling with special emphasis on deconcentration opportunities. Balance this effort with initiatives to promote tenant stability with landlords.***
  - Conduct outreach efforts to potential voucher landlords: ***Utilize SHA's "Landlord Liaison" quarterly newsletter and SHA's membership in the Inland Empire Rental Association to conduct continued outreach to potential voucher landlords with the goal of adding at least 25 new landlords per year.***
  - Increase voucher payment standards ***if necessary to promote participant deconcentration.***
  - Implement voucher homeownership program:
  - Implement public housing or other homeownership programs: ***Continue to encourage use of escrowed savings by graduating participants in SHA's Family Self-Sufficiency Program (Independent Family Futures) for home purchase; Promote a rate of at least 25% of FSS graduates who transition to homeownership; Continue to support and collaborate with a wide variety of service providers who offer homebuyer assistance.***

- 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)
    - 1) *Continue to aggressively market SHA public housing to ensure a mix of incomes throughout the program*
    - 2) *Maintain screening procedures to identify areas of tenant/neighborhood concern*
    - 3) *Continue to work with local law enforcement and "community-oriented policing" efforts to enhance the safety and security of our public and assisted housing and the neighborhoods in which they are located.*

**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: *Raise the percentage of employed persons in assisted households by at least 10% over the five-year plan period by promoting positive Welfare-to-Work outcomes and encouraging use of volunteer/community service experience to increase client employability.*
  - Provide or attract supportive services to improve assistance recipients' employability: *Fully implement the partnerships inherent in the Welfare-to-Work Program; Ensure the development of family employment plans by the approximately 700 Welfare-to-Work participating families; Apply for and administer a Resident Opportunities Self-Sufficiency grant to assist 75 public housing families in their self-sufficiency efforts.*

- Provide or attract supportive services to increase independence for the elderly or families with disabilities. *Continue to enhance the viability of the Parsons Resident Association as a 501(c)(3), by providing technical assistance and support; Promote the delivery of quality support systems by owners of SRO Moderate Rehab projects. Continue to encourage the involvement of the social work departments of local institutions of higher learning in the development/operation of innovative support systems.*
- 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: *Ensure annual training of all SHA staff in Fair Housing principles and procedures.*
  - 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: *Expand marketing of all housing opportunities throughout the SHA service area; Provide assistance to families in need of reasonable accommodation; Establish clear designation of staff responsibility for equal opportunity compliance.*
  - Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required: *Continue to support completion and full community utilization of a data-base of local accessible housing units begun with a 1998 SHA grant of \$28,000.*
  - Other: (list below)

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

- Strengthen Housing Authority relationships with government entities within the SHA service area.*
  - Objectives:**
    - Negotiate and/or re-negotiate interlocal agreements with primary government entities within the SHA service area (4 counties).*
    - Take a more proactive role in the development of local and regional comprehensive plans and housing affordability strategies.*
    - Build community awareness about the impacts of positive intergovernmental relations in the communities served by the SHA.*
    - Identify specific opportunities to address affordable housing deficiencies in the rural counties served by the SHA.*

- ☒ ***Continue to use all available media to inform the general public about housing needs and successes.***  
***Objectives:***
  - ☒ ***Increase the number and quality of press releases about housing issues from the SHA in order to increase affordable housing opportunities.***
  - ☒ ***Help to educate the general public on how people can become involved in creating housing solutions by offering increased presentations to local groups and organizations.***
  
- ☒ ***Promote a motivating work environment with a capable and efficient team of employees to operate as a customer-friendly and fiscally-prudent leader in the affordable housing community.***  
***Objectives:***
  - ☒ ***Develop specific opportunities for staff to develop/use communications skills.***
  - ☒ ***Develop and maintain a comprehensive SHA Policy/Procedure Manual with "Readers Digest" versions matched to each staff position in order to fully empower staff and establish staff accountability***
  - ☒ ***Implement additional systems to assist staff in dealing effectively with program abuse and/or fraud by clients, including the tools needed to collect over-paid assistance.***

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

**i. Annual Plan Type:**

Select which type of Annual Plan the PHA will submit.

**Standard Plan**

**Streamlined Plan:**

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

**Troubled Agency Plan**

**ii. Executive Summary of the Annual PHA Plan**

[24 CFR Part 903.7 9 (r)]

*The Spokane Housing Authority has prepared this Agency Plan in compliance with Section 511 of the Quality Housing and Work Responsibility Act of 1998 and the ensuing HUD requirements.*

**Annual Plan Highlights**

- *Expand number of households served to over 4,000.*
- *Target in excess of the required 40% of new Public Housing admissions to households with incomes at or below 30% of the area median income.*
- *Promote mixed income projects, neighborhoods, and communities by providing a public housing preference for families who work.*
- *Assist a wide variety of households in need and maximize the efficient use of resources by utilizing a streamlined Section 8 tenant selection standard. Supplement this standard by effectively administering special set-aside programs for specific populations in need (e.g.; 125 Mainstream Vouchers for persons with disabilities; 100 Family Unification Vouchers for families experiencing domestic violence and other evidence of instability; 700 Welfare-to-Work Vouchers for very low income families seeking to reach financial self-sufficiency; HOPWA rental housing assistance for persons diagnosed as HIV Positive or with AIDS; HOME Tenant-based Rental Assistance for homeless families with children transitioning back to permanent housing; and SRO Mod-Rehab Section 8 Certificates for single homeless adults.) Increase number of households served by approximately 800.*

- *Reduce the minimum rent level for Section 8 and Public Housing from \$25.00 to \$-0- and establish new optional "flat rents" for all public housing units.*
- *Establish new policies allowing for pets in all of Spokane's family public housing units.*
- *Utilize Section 8 Rental assistance as a "safety net" and not to provide Housing Assistance Payments for mortgage payment support.*
- *Retain the Voucher Payment Standard at 100% of the Fair Market Rent, with any increase to the allowable 110% limited to efforts to promote deconcentration.*
- *Promote use of SHA tax-exempt bond financing to support the development (acquisition/construction/rehabilitation) of affordable housing by non-profit and for-profit housing entities.*
- *Implement new tenant Community Service Program.*
- *Continue and expand levels of collaboration with service agencies, housing providers, landlords, and continuum of care coalitions throughout the SHA service area.*
- *Apply for and implement a quality capital improvements program to ensure the continued high quality of SHA's Public Housing stock.*
- *Fully implement all newly-developed and newly-revised program and agency policies in a manner consistent with goals and objectives; Maintain policy directory in a location easily accessible to SHA staff and the general public.*

### **iii. Annual Plan Table of Contents**

[24 CFR Part 903.7 9 (r)]

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

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### **Attachments**

Indicate which attachments are provided by selecting all that apply. Provide the attachment's name (A, B, etc.) in the space to the left of the name of the attachment. Note: If the attachment is provided as a SEPARATE file submission from the PHA Plans file, provide the file name in parentheses in the space to the right of the title. **Attachments are not provided as a separate file attachment but are included as a part of this document.**

Required Attachments:

- Admissions Policy for Deconcentration [**Attachment A**]
- FY 2000 Capital Fund Program Annual Statement [**Attachment B**]
- Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)

Optional Attachments:

- PHA Management Organizational Chart *[Attachment E]*
- FY 2000 Capital Fund Program 5 Year Action Plan *[Attachment H]*
- Public Housing Drug Elimination Program (PHDEP) Plan
- Comments of Resident Advisory Board or Boards (must be attached if not included in PHA Plan text) *[Attachment F]*
- Other (List below, providing each attachment name)
  - *Optional Public Housing Asset Management Table (Attachment C)*
  - *SHA Program Chart (Attachment D)*
  - *SHA Response to Resident Advisory Board Comments (Attachment G)*
  - *Other Public Comments (Attachment I)*

### 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.

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
<b>X</b>	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations	5 Year and Annual Plans
<b>X</b>	State/Local Government Certification of Consistency with the Consolidated Plan	5 Year and Annual Plans
<b>X</b>	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
<b>X</b>	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
<b>X</b>	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources;
<b>X</b>	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
<b>X</b>	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
<b>X</b>	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 2/18/99 <i>Quality Housing and Work Responsibility Act Initial Guidance; Notice</i> and any further HUD guidance) and	Annual Plan: Eligibility, Selection, and Admissions Policies

**List of Supporting Documents Available for Review**

<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
	2. Documentation of the required deconcentration and income mixing analysis	
<b>X</b>	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
<b>X</b>	Schedule of flat rents offered at each public housing development <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
<b>X</b>	Section 8 rent determination (payment standard) policies <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
<b>X</b>	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
<b>X</b>	Public housing grievance procedures <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
<b>X</b>	Section 8 informal review and hearing procedures <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
<b>N/A</b>	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant year	Annual Plan: Capital Needs
<b>X</b>	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant	Annual Plan: Capital Needs
<b>N/A</b>	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
<b>N/A</b>	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
<b>N/A</b>	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition
<b>N/A</b>	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing
<b>N/A</b>	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
<b>N/A</b>	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership
<b>X</b>	Policies governing any Section 8 Homeownership program <input type="checkbox"/> check here if included in the Section 8 Administrative Plan	Annual Plan: Homeownership
<b>X</b>	Any cooperative agreement between the PHA and the TANF agency	Annual Plan: Community Service & Self-Sufficiency
<b>X</b>	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency

**List of Supporting Documents Available for Review**

<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
<b>X</b>	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports	Annual Plan: Community Service & Self-Sufficiency
<i>N/A</i>	The most recent Public Housing Drug Elimination Program (PHDEP) semi-annual performance report for any open grant and most recently submitted PHDEP application (PHDEP Plan)	Annual Plan: Safety and Crime Prevention
<b>X</b>	The most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h)), the results of that audit and the PHA's response to any findings	Annual Plan: Annual Audit
	Troubled PHAs: MOA/Recovery Plan	Troubled PHAs
	Other supporting documents (optional) (list individually; use as many lines as necessary)	(specify as needed)
<b>X</b>	<i>All SHA Policies</i>	

# 1. Statement of Housing Needs

[24 CFR Part 903.7 9 (a)]

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

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

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Location
Income <= 30% of AMI	19,472	5	5	5	3	5	3
Income >30% but <=50% of AMI	15,965	5	5	5	3	5	3
Income >50% but <80% of AMI	11,949	5	5	5	3	4	3
Elderly	20,740	5	5	4	5	3	2
Families with Disabilities	22,508	5	5	5	5	4	4
Race/Ethnicity -W		5	5	5	3	4	3
Race/Ethnicity -B	3624	5	5	5	3	4	3
Race/Ethnicity -A		5	5	5	3	4	3
Race/Ethnicity -NA		5	5	5	3	4	3
Race/Ethnicity -H		5	5	5	3	4	3

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

- Consolidated Plan of the Jurisdiction/s  
Indicate year:
  - ❖ 1999 City of Spokane Consolidated Community Development Housing Plan
  - ❖ 1995-2000 Spokane County Housing & Community Development Plan
  - ❖ 1999 Spokane County HOME & CDBG Annual Action Plan
  - ❖ 1995 Washington State Consolidated Plan
- 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)
  - ❖ Community Agency Survey, 12/2/99

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

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

<b>Housing Needs of Families on the Waiting List</b> (based on review conducted 12/99 through 1/00)			
Waiting list type: (select one)			
<input checked="" type="checkbox"/> <b>Section 8 tenant-based assistance</b>			
<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 (1/99-12/99)
Waiting list total	3145		744
Extremely low income <=30% AMI	2612	83%	
Very low income (>30% but <=50% AMI)	443	14%	
Low income (>50% but <80% AMI)	90	3%	
Families with children	1850	59%	
Elderly families	140	4%	
Families with Disabilities	1155	37%	
Race/ethnicity--W	2711	86%	
Race/ethnicity—B	167	5%	
Race/ethnicity—A	65	2%	
Race/ethnicity--NA	202	6%	
Race/ethnicity—H	95	3%	
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 type="checkbox"/> No <input type="checkbox"/> Yes			

### Housing Needs of Families on the Waiting List

(based on review conducted 12/99 through 1/00)

Waiting list type: (select one)

- Section 8 tenant-based assistance  
 Public Housing  
 Combined Section 8 and Public Housing  
 Public Housing Site-Based or sub-jurisdictional waiting list (optional)

If used, identify which development/subjurisdiction:

	# of families	% of total families	Annual Turnover (1/99-12/99)
Waiting list total	1520		30
Extremely low income <=30% AMI	1316	87%	
Very low income (>30% but <=50% AMI)	171	11%	
Low income (>50% but <80% AMI)	33	2%	
Families with children	668	44%	
Elderly families	140	9%	
Families with Disabilities	712	47%	
Race/ethnicity--W	1270	83%	
Race/ethnicity—B	89	5%	
Race/ethnicity—A	55	3%	
Race/ethnicity--NA	106	7%	
Race/ethnicity—H	39	2%	

Characteristics by Bedroom Size (Public Housing Only)

1BR	627	41%	
2 BR	228	15%	
3 BR	547	36%	
4 BR or more	118	8%	

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

If yes:

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

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

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

### 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.

***In the year 2000, the Spokane Housing Authority will use all reasonable efforts to provide safe and affordable housing to extremely low-income, very-low income and low-income residents of Spokane, Stevens, Whitman and Pend Oreille counties.***

***In our efforts to assist extremely low-income families, we pledge to exceed HUD targeting requirements that require 40% of new public housing participants are at or below 30% of area median income. Our strategy to assist families above 30% of area median income includes using admission preferences for public housing families who work. On behalf of all low-income families, we intend to apply for additional Section 8, special-purpose and disability vouchers as they become available and to pursue other housing resources outside the public housing and Section 8 programs.***

***Finally, in addition to providing ongoing rental assistance to 3980 families, the Spokane Housing Authority will also assist hundreds of "new" families under our recently awarded Welfare-to-Work and Family Unification programs. Each of these families will be given the opportunity to participate in our Family Self Sufficiency Program and will be referred to a number of other community service organizations to help maximize individual success.***

**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  
***Implement life-cycle costing policy for each public housing unit to accurately anticipate future costs***
- 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  
***Provide Spokane Housing Authority representation on the local landlord organization (IERA) to increase education and promote communication.***

*Continue to produce a quarterly landlord newsletter, The Landlord Liaison, to enhance understanding of Spokane Housing Authority programs and policies.*

- 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
- Maintain Spokane Housing Authority representation on local Continuum of Care groups.***
- 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. ***Continue to create new partnerships and increase collaborative efforts by working with local housing organizations, non-profits and other government entities.***
- 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 ***Adopt policy permitting public housing residents to pay a flat rent. Utilize local public housing selection preferences for those working 20+ hours per week.***
- Other: (list below) ***Fully implement Welfare-to-Work vouchers for working applicants who are otherwise eligible.***

**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  
*Maintain current Section 8 preference for those who work in the County.  
Offer Welfare-to-Work vouchers for working applicants who are otherwise eligible.*
- Adopt rent policies to support and encourage work  
*Adopt policy permitting public housing residents to pay a flat rent.*
- Other: (list below)  
*Continue to expand Family Self-Sufficiency efforts.  
Promote family member employability through implementation of Welfare-to-Work and  
Community Service programs.*

**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  
*Continue to collaborate with the Coalition of the Responsible Disabled, the Spokane AIDS Network, the Spokane County Regional Support Network to provide clients with a variety of social support systems.*
- 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  
*Provide weekly updates on county-wide housing vacancies (unit listings) for program participants.*
- Market the section 8 program to owners outside of areas of poverty /minority concentrations
- Other: (list below)  
*Provide Spokane Housing Authority staff training by local fair housing advocates on laws and resources for program participants.*

**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.

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>1. Federal Grants (FY 2000 grants)</b>		
a) Public Housing Operating Fund	159,326	
b) Public Housing Capital Fund	221,764	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	14,426,000	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)		
g) Resident Opportunity and Self-Sufficiency Grants(FSS Coord.)	46,350	
h) Community Development Block Grant		
i) HOME	634,535	TBRA
Other Federal Grants (list below)		
HOPWA	175,454	TBRA
<b>2. Prior Year Federal Grants (unobligated funds only) (list below)</b>		
FIC (For FY 2000)	124,943	FSS Support
CIAP (for FY 1999)	241,048	
<b>3. Public Housing Dwelling Rental Income</b>	252,000	P.H. Operations
<b>4. Other income (list below)</b>		
Public Housing Interest Income	6,400	P.H. Operations
Sec. 8 Interest Income	14,800	Sec. 8 Operations
<b>4. Non-federal sources (list below)</b>		
<b>Total resources</b>	16,302,620	

### **3. PHA Policies Governing Eligibility, Selection and Admission**

[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) ***1-10 places on waiting list***
- When families are within a certain time of being offered a unit: (state time) ***1-3 months***
- Other: (describe) ***As units become available, especially for 2 bedroom family units; SHA only owns 4 such units.***

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) ***Utility bill payment history***

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

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

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

#### **(2) Waiting List Organization**

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

- Community-wide list
- Sub-jurisdictional lists
- Site-based waiting lists
- Other (describe) ***Applicants may indicate area/project preference.***

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-*if available*
  - Underhoused-*if available*
  - Medical justification
  - Administrative reasons determined by the PHA (e.g., to permit modernization work)

- Resident choice: (state circumstances below)
- Other:  
Reasonable Accommodation

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)  
*Accessibility needs*

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

3 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)

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

**Accessibility needs**

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)

**SHA Library, HUD Community Builders**

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

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? *SHA family Public Housing is composed solely of single family and duplex units and these units are widely scattered throughout Spokane County.*

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? *SHA will continue to monitor income mixing patterns resulting from our selection process.*

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
  - Other (describe below)  
***Current and past landlord/tenant history.***

**(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
    - SHA Office in Colville, WA
    - SHA Office in Newport, WA
    - CAC Office in Pullman, WA

### (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: *An additional 60 days is granted if:*

- 1) *the applicant made reasonable efforts during the first 60 day period to secure housing or,*
- 2) *medical emergency has prevented housing search efforts or,*
- 3) *a request for reasonable accommodation is submitted and approved.*

### (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)  
*Terminal illness.*

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.

3 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
- 1 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
- 2 Other preference(s) (list below)
  - Terminal illness.***

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)  
*Media stories, newsletters, flyers and community networking.*

**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)
- 95<sup>th</sup> 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) \$200
- Other (list below)

g.  Yes  No: Does the PHA plan to implement individual savings accounts for residents (ISAs) as an alternative to the required 12 month disallowance of earned income and phasing in of rent increases in the next year? ***Note: 62% of SHA's FSS participants have escrow accounts. Nearly \$300,000 has been paid out to program graduates, while about \$400,000 remains in the escrow fund***

## (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)  
*Deconcentration goals*

**(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)

*[Exempt - High Performing PHA]*

**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. (*Attachment E*)
- A brief description of the management structure and organization of the PHA follows:

**B. HUD Programs Under PHA Management (See Attachment H)**

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		
Section 8 Vouchers		
Section 8 Certificates		
Section 8 Mod Rehab		
Special Purpose Section 8 Certificates/Vouchers		

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

**C. Management and Maintenance Policies**

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

- (1) Public Housing Maintenance and Management: (list below)
- (2) Section 8 Management: (list below)

**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.

*[Exempt - High Performing PHA]*

**A. Public Housing**

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

If yes, list additions to federal requirements below:

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

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

**B. Section 8 Tenant-Based Assistance**

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

If yes, list additions to federal requirements below:

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

- PHA main administrative office  
 Other (list below)

**7. Capital Improvement Needs**

[24 CFR Part 903.7 9 (g)]

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

**A. Capital Fund Activities**

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

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

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

Select one:

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

-or-

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

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

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

Capital Fund Grant Number **WA005**      FFY of Grant Approval: **(10/2000)**

Original Annual Statement

Line No.	Summary by Development Account	Total Estimated Cost
1	Total Non-CGP Funds	
2	1406 Operations	\$24,000.00
3	1408 Management Improvements	\$5,000.00
4	1410 Administration	\$18,000.00
5	1411 Audit	
6	1415 Liquidated Damages	
7	1430 Fees and Costs	\$20,000.00
8	1440 Site Acquisition	
9	1450 Site Improvement	\$22,500.00
10	1460 Dwelling Structures	\$123,265.00
11	1465.1 Dwelling Equipment-Nonexpendable	\$6,500.00
12	1470 Nondwelling Structures	
13	1475 Nondwelling Equipment	
14	1485 Demolition	
15	1490 Replacement Reserve	
16	1492 Moving to Work Demonstration	
17	1495.1 Relocation Costs	\$2,500.00
18	1498 Mod Used for Development	
19	1502 Contingency	
20	<b>Amount of Annual Grant (Sum of lines 2-19)</b>	<b>\$221,765.00</b>
21	Amount of line 20 Related to LBP Activities	
22	Amount of line 20 Related to Section 504 Compliance	
23	Amount of line 20 Related to Security	
24	Amount of line 20 Related to Energy Conservation Measures	\$20,000.00

**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
55001	Air handler study	1430	\$ 20,000.00
	Two (2) Handicapped Kitchen remodels	1460	\$ 30,000.00
	Temporary tenant relocation	1495.1	\$ 2,500.00
55002	Landscaping & fencing (1fence & 6 units)	1450	\$ 9,000.00
	Replace and install as indicated by Life Cycle Costing System: windows, vinyl siding, decks, floor coverings, roofs, furnaces, garage doors (26 units with various work items, 1 furnace)	1460	\$37,300.00
	Replace as indicated by Life Cycle Costing System ranges, refrigerators, appliances (9)	1465.1	\$ 2,600.00
55004	Landscaping & fencing (2 units)	1450	\$3,000.00
	Replace and install as indicated by Life Cycle Costing System: windows, vinyl siding, decks, floor coverings, roofs, furnaces, garage doors (9 units with various work items)	1460	\$12,435.00
	Replace as indicated by Life Cycle Costing System ranges, refrigerators, appliances (4)	1465.1	\$866.00
55006	Landscaping & fencing (1 fence 4 units)	1450	\$6,300.00
	Replace and install as indicated by Life Cycle Costing System: windows, vinyl siding, decks, floor coverings, roofs, furnaces, garage doors (18 units with various work items, 1 furnace)	1460	\$26,130.00
	Replace as indicated by Life Cycle Costing System ranges, refrigerators, appliances (6)	1465.1	\$1,820.00
55007	Landscaping & fencing (1 unit)	1450	\$2,100.00
	Replace and install as indicated by Life Cycle Costing System: windows, vinyl	1460	\$8,700.00

55008	siding, decks, floor coverings, roofs, furnaces, garage doors (7 units with various work items) Replace as indicated by Life Cycle Costing	1465.1	\$607.00
	Landscaping & fencing (1 units) Replace and install as indicated by Life Cycle Costing System: windows, vinyl siding, decks, floor coverings, roofs, furnaces, garage doors (7 units with various work items)	1450 1460	\$2,100.00 \$8,700.00
	Replace as indicated by Life Cycle Costing System ranges, refrigerators, appliances (3)	1465.1	\$607.00
HA Wide	Operations	1406	\$24,000.00
HA Wide	Management Improvements (technical assistance to refine Life Cycle Costing System)	1408	\$5,000.00
HA Wide	Administration of grant	1410	\$18,000.00

**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)
55001	03/31/2002	09/30/2002
55002	03/31/2002	09/30/2002
55004	03/31/2002	09/30/2002
55006	03/31/2002	09/30/2002
55007	03/31/2002	09/30/2002
55008	03/31/2002	09/30/2002
HA WIDE	03/31/2002	09/30/2002

**(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 (D)

-or-

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

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

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

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
WA55001	PARSONS APARTMENTS	N/A	N/A	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Handicapped Kitchen Remodels (8)			\$120,000.00	2001
Temporary Tenant Relocation			\$10,000.00	2001
Replace & Modernize Emergency Call System			\$100,000.00	2002
<b>Total Estimated Cost Over Next 5 Years</b>			<b>\$230,000.00</b>	

\* Total includes monies in budget for year 1 (i.e. FY 2000)

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

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

<b>Optional 5-Year Action Plan Tables</b>				
<b>Development Number</b>	<b>Development Name (or indicate PHA wide)</b>	<b>Number Vacant Units</b>	<b>% Vacancies in Development</b>	
WA55002	LRPH – 2	N/A	N/A	
<b>Description of Needed Physical Improvements or Management Improvements</b>			<b>Estimated Cost</b>	<b>Planned Start Date (HA Fiscal Year)</b>
<b>Landscaping Fence Replacement</b>			<b>\$36,000.00</b>	<b>2001</b>
<b>Replace as indicated by Life Cycle Costing System: roofs, vinyl siding; floor coverings; garage doors; windows; furnaces; decks</b>			<b>\$125,420.00</b>	<b>2001</b>
<b>Replace as indicated by Life Cycle Costing System for Capital Replacements: stove, refrigerators, appliances</b>			<b>\$10,400.00</b>	<b>2001</b>
<b>Total Estimated Cost Over Next 5 Years</b>			<b>\$171,820.00</b>	

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

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

<b>Optional 5-Year Action Plan Tables</b>				
<b>Development Number</b>	<b>Development Name (or indicate PHA wide)</b>	<b>Number Vacant Units</b>	<b>% Vacancies in Development</b>	
WA55004	LRPH-4	N/A	N/A	
<b>Description of Needed Physical Improvements or Management Improvements</b>			<b>Estimated Cost</b>	<b>Planned Start Date (HA Fiscal Year)</b>
<b>Landscaping Fence Replacement</b>			<b>\$12,000.00</b>	<b>2001</b>
<b>Replace as indicated by Life Cycle Costing System: roofs; vinyl siding; floor coverings; garage doors; windows; furnaces; decks</b>			<b>\$43,900.00</b>	<b>2001</b>
<b>Replace as indicated by Life Cycle Costing System for Capital replacements: stove, refrigerator, appliances</b>			<b>\$3,464.00</b>	<b>2001</b>
<b>Total estimated cost over next 5 years</b>			<b>\$59,364.00</b>	

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

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

<b>Optional 5-Year Action Plan Tables</b>				
<b>Development Number</b>	<b>Development Name (or indicate PHA wide)</b>	<b>Number Vacant Units</b>	<b>% Vacancies in Development</b>	
WA55006	LRPH-6	N/A	N/A	
<b>Description of Needed Physical Improvements or Management Improvements</b>			<b>Estimated Cost</b>	<b>Planned Start Date (HA Fiscal Year)</b>
<b>Landscaping Fence Replacement</b>			<b>\$25,200.00</b>	<b>2001</b>
<b>Replace as indicated by Life Cycle Costing System: roofs; vinyl siding; floor coverings; garage doors; windows; furnaces; decks</b>			<b>\$87,800.00</b>	<b>2001</b>
<b>Replace as indicated by Life Cycle Costing System for Capital replacements: stove, refrigerators, appliances</b>			<b>\$7,280.00</b>	<b>2001</b>
<b>Total estimated cost over next 5 years</b>			<b>\$120,280.00</b>	

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

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

<b>Optional 5-Year Action Plan Tables</b>				
<b>Development Number</b>	<b>Development Name (or indicate PHA wide)</b>	<b>Number Vacant Units</b>	<b>% Vacancies in Development</b>	
<b>WA55007</b>	<b>LRPH-7</b>	<b>N/A</b>	<b>N/A</b>	
<b>Description of Needed Physical Improvements or Management Improvements</b>			<b>Estimated Cost</b>	<b>Planned Start Date (HA Fiscal Year)</b>
<b>Landscaping Fence Replacement</b>			<b>\$8,400.00</b>	<b>2001</b>
<b>Replace as indicated by Life Cycle Costing System: roofs, vinyl siding; floor coverings; garage doors; windows; furnaces; decks</b>			<b>\$28,220.00</b>	<b>2001</b>
<b>Replace as indicated by Life Cycle Costing System for Capital replacements: stove, refrigerators, appliances</b>			<b>\$2,428.00</b>	<b>2001</b>
<b>Total estimated cost over next 5 years</b>			<b>\$39,048.00</b>	

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

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

<b>Optional 5-Year Action Plan Tables</b>				
<b>Development Number</b>	<b>Development Name (or indicate PHA wide)</b>	<b>Number Vacant Units</b>	<b>% Vacancies in Development</b>	
<b>WA55008</b>	<b>LRPH-8</b>	<b>N/A</b>	<b>N/A</b>	
<b>Description of Needed Physical Improvements or Management Improvements</b>			<b>Estimated Cost</b>	<b>Planned Start Date (HA Fiscal Year)</b>
<b>Landscaping Fence Replacement</b>			<b>\$8,400.00</b>	<b>2001</b>
<b>Replace as indicated by Life Cycle Costing System: roofs; vinyl siding; floor coverings; garage doors; windows; furnaces; decks</b>			<b>\$28,220.00</b>	<b>2001</b>
<b>Replace as indicated by Life Cycle Costing System for Capital Replacements: stove, refrigerators, appliances</b>			<b>\$2,428.00</b>	<b>2001</b>
<b>Total estimated cost over next 5 years</b>			<b>\$39,048.00</b>	

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

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

Optional 5-Year Action Plan Tables			
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development
HA WIDE	PHA Wide	N/A	N/A
Description of Needed Physical Improvements or Management Improvements			Estimated Cost
			Planned Start Date (HA Fiscal Year)
<b>OPERATIONS (1406)</b>			<b>\$96,000.00</b>
Inventory control system (1408)			\$15,500.00
Update "Life-Cycle Costing" System (1408)			\$44,000.00
<b>ADMINISTRATION (1410)</b>			<b>\$72,000.00</b>
<b>Total estimated cost over next 5 years</b>			<b>\$227,500.00</b>

### 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.) (*Not applicable*)

<b>Demolition/Disposition Activity Description</b>	
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)]

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

1.  Yes  No: Has the PHA designated or applied for approval to designate or does the PHA plan to apply to designate any public housing for occupancy only by the elderly families or only by families with disabilities, or by elderly families and families with disabilities or will apply for designation for occupancy by only elderly families or only families with disabilities, or by

elderly families and families with disabilities as provided by section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e) in the upcoming fiscal year? (If “No”, skip to component 10. If “yes”, complete one activity description for each development, unless the PHA is eligible to complete a streamlined submission; PHAs completing streamlined submissions may skip to component 10.)

2. Activity Description

Yes  No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? If “yes”, skip to component 10. If “No”, complete the Activity Description table below. (*Not applicable*)

<b>Designation of Public Housing Activity Description</b>
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: <u>(DD/MM/YY)</u>
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: 7. Coverage of action (select one) <input type="checkbox"/> Part of the development <input type="checkbox"/> Total development

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

[24 CFR Part 903.7 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. *Not applicable due to High Performer status but see Public Housing Asset Management Table in the Attachment section.*

<b>Conversion of Public Housing Activity Description</b>
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) <input type="checkbox"/> Conversion Plan in development <input type="checkbox"/> Conversion Plan submitted to HUD on: (DD/MM/YYYY) <input type="checkbox"/> Conversion Plan approved by HUD on: (DD/MM/YYYY) <input type="checkbox"/> Activities pursuant to HUD-approved Conversion Plan underway
5. Description of how requirements of Section 202 are being satisfied by means other than conversion (select one) <input type="checkbox"/> Units addressed in a pending or approved demolition application (date submitted or approved: <input type="checkbox"/> Units addressed in a pending or approved HOPE VI demolition application (date submitted or approved: ) <input type="checkbox"/> Units addressed in a pending or approved HOPE VI Revitalization Plan (date submitted or approved: ) <input type="checkbox"/> Requirements no longer applicable: vacancy rates are less than 10 percent <input type="checkbox"/> Requirements no longer applicable: site now has less than 300 units <input type="checkbox"/> Other: (describe below)

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

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

## 11. Homeownership Programs Administered by the PHA

[24 CFR Part 903.7 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.)

<b>Public Housing Homeownership Activity Description (Complete one for each development affected)</b>
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 (1)]

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**

The Quality Housing and Work Responsibility Act of 1998 requires that housing authorities set forth in our Annual Plan a description of our Community Service and Self-Sufficiency Programs. This portion of the Plan is divided into three (3) sections:

- Our current resident programming;
- How we intend to comply with income changes for welfare recipients; and
- Compliance with the community service requirements.

*First, let us describe our current resident programming. We are engaged in the following resident programs:*

- Independent Family Futures (IFF) is Spokane Housing Authority's Self-Sufficiency Program. Independent Family Futures is governed by a Coordinating Committee which includes Public Housing Residents, other participants, SHA Management, staff from partner agencies and leaders and business people in the community. IFF sub-programs include but are not limited to the BANC Program, Building Assets for the New Century; IFF Loan Program; The Rent A Kid Program; the CHOICE, Program Creating Homeownership In Community Environments and Volunteer Income Tax Assistance. There are on-site classes in money management, homeownership counseling, car repair, budget counseling, parenting skills, pre-employment training and more. Over 40% of the participants to date have achieved independence and become homeowners. Currently there are 328 participants in the program 243 in Spokane and 85 in Whitman County. Graduates total 86 with 75 from Spokane and 11 from Whitman County. To date 19 Public Housing Residents have participated with 4 graduating.*
- Spokane Housing Authority has recently received an award for 700 Section 8 Welfare to Work Vouchers. We believe the Welfare to Work Program will enhance and compliment the current IFF efforts. The Housing Authority has solidified new partnerships and existing partnerships. In order to provide for the greatest opportunities for participants to reach independence.*
- The Spokane Housing Authority has entered into a partnership with the City of Spokane and four transitional housing providers to provide permanent housing through our City HOME Tenant Based Rental Assistance. The permanent housing has a two year limitation and is targeted to participants, referred by the partnership agencies, who have the greatest opportunity to achieve independence in that time frame. Case management is provided by the agency partners and a six month follow-up will be required. The partnership agencies applied for THOR funding from the State of Washington to assist these families with very specialized case management and other housing assistance.*
- The Spokane Housing Authority has also received 100 new Section 8 Vouchers for the Family Unification Program. Through an extensive network of partnerships SHA will provide housing for families that are at risk of losing their children because of the lack of housing or for families to regain custody of their children who were lost due to the lack of housing. The partnership agencies will in turn provide for extensive case management to assist the families in stabilization and self-sufficiency.*

*Second, we will be in full compliance with the income changes for welfare recipients requirement of the Quality Housing and Work Responsibility Act of 1998. We took care of the issue by modifying the income definitions in both our Admissions and Continued Occupancy Policy and our Section 8 Administrative Plan. The relevant section reads as follows:*

*“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 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.”*

*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.*

*Third, per the instructions given in the Interim Rule, we are deferring decisions on how we will deal with the new community service requirement (even though we have included the requirements in our Occupancy Plan and Administrative Services Plan documents) until HUD issues a final regulation on this matter.*

1. Cooperative agreements:

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

If yes, what was the date that agreement was signed? 04/07/99

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) *Coordinate with the local child welfare agency to provide housing under the Family Unification program.*

## **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 (*Welfare-to-Work Voucher program*)  
 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



### C. Welfare Benefit Reductions

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

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

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

### 13. PHA Safety and Crime Prevention Measures

*[Exempt - High Performing PHA]*

[24 CFR Part 903.7 9 (m)]

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

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

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

- High incidence of violent and/or drug-related crime in some or all of the PHA's developments
- High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to the PHA's developments
- Residents fearful for their safety and/or the safety of their children
- Observed lower-level crime, vandalism and/or graffiti
- People on waiting list unwilling to move into one or more developments due to perceived and/or actual levels of violent and/or drug-related crime
- Other (describe below) None

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)

Parsons Apartments #WA19PO55001  
75 Scattered-Sites #WA19PO55002, 004, 006, 007

**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)

Parsons Apartments #WA19PO55001  
75 Scattered-Sites #WA19PO55002, 004, 006, 007

**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)  
Parsons Apartments #WA19PO55001

**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: \_\_\_)

**14 RESERVED FOR PET POLICY**

[24 CFR Part 903.7 9 (n)]

**15. Civil Rights Certifications**

[24 CFR Part 903.7 9 (o)]

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

**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? 3
- 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)

*Development/Maintenance of Comprehensive Computerized Life-Cycle Costing System*

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 (E)
- 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) *See full SHA response at Attachment G*

### **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.) ***Pursuant to state law, SHA Board members are appointed by the Mayor of the City of Spokane. Even before the passage of QHWRA, the Mayor had appointed a resident to our Board of Commissioners. It is expected that such resident membership will continue. In the event, however, that resident membership fails to be maintained through the mayoral appointment process, the SHA will rely on a recent amendment to the State of Washington Housing Authority's Act to create and fill a sixth (resident) commissioner position.***

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) Self-nomination: candidates apply for appointment by the Mayor of the City of Spokane

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)  
Mayor and City Council

**C. Statement of Consistency with the Consolidated Plan**

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

1. Consolidated Plan jurisdiction: (provide name here) ***City of Spokane, Spokane County and the 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)  
*See page 1, Annual Plan*
- Other: (list below)

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

**D. Other Information Required by HUD**

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

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**Attachment Library**

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

## Attachment Library

### Attachments

- A. Admissions Policy for Deconcentration (from ACOP)
- B. Optional P.H. Asset Management Table
- C. SHA Program Chart
- D. SHA Organizational Chart
- E. Final Agency Plan Recommendations of Resident Advisory Board
- F. SHA Response to Resident Advisory Board Comments
- G. Other Public Comments

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

### Attachment A

#### **Admissions Policy for Deconcentration**

It is the policy of the Spokane Housing Authority to encourage 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 pledge to affirmatively market our housing to all eligible income groups. Lower income residents will not be steered toward lower income developments and higher income residents will not be steered toward higher income developments.

The Spokane Housing Authority will continue to analyze income levels of families residing in each of our developments, income levels in area census tracts and the income levels of families on our waiting lists. Based on this analysis, we will determine the level of marketing strategies and deconcentration incentives to implement.

The Spokane Housing Authority may offer one or more incentives to encourage applicant families whose income classification would help to meet deconcentration goals. Various incentives may be used at different times or under different conditions, but will always be provided in a consistent and nondiscriminatory manner.

**Attachment B**

**Optional Public Housing Asset Management Table**

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

<b>Public Housing Asset Management</b>								
<b>Development Identification</b>		<b>Activity Description</b>						
Name, Number, and Location *	Number and Type of units	Capital Fund Program Parts II and III <i>Component 7a</i>	Development Activities <i>Component 7b</i>	Demolition / disposition <i>Component 8</i>	Designated housing <i>Component 9</i>	Conversion <i>Component 10</i>	Home-ownership <i>Component 11a</i>	Other (describe) <i>Component 17</i>
9001	50 - MFR	\$80,000.00 (3/31/2002 – 9/30/2002)	N/A	N/A	N/A	N/A	N/A	N/A
9002	30-SFR	\$70,800.00 (3/31/2002 – 9/30/2002)	N/A	N/A	N/A	N/A	N/A	N/A
9004	10 – SFR	\$ 23,010.00 (3/31/2002 – 9/30/2002)	N/A	N/A	N/A	N/A	N/A	N/A
9006	21 MIXED	\$49,560.00 (3/31/2002 – 9/30/2002)	N/A	N/A	N/A	N/A	N/A	N/A
9007	7 MIXED	\$16,815.00 (3/31/2002 – 9/30/2002)	N/A	N/A	N/A	N/A	N/A	N/A
9008	7 – MIXED	\$16,815.00 (3/31/2002 – 9/30/2002)	N/A	N/A	N/A	N/A	N/A	N/A
HA WIDE	N/A	\$35,000.00 (3/31/2002 – 9/30/2002)	N/A	N/A	N/A	N/A	N/A	N/A

\* NOTE: 9001, 9002, 9004 & 9007 ALL LOCATED IN THE CITY OF SPOKANE; 9006,& 9008 ALL LOCATED IN SPOKANE COUNTY

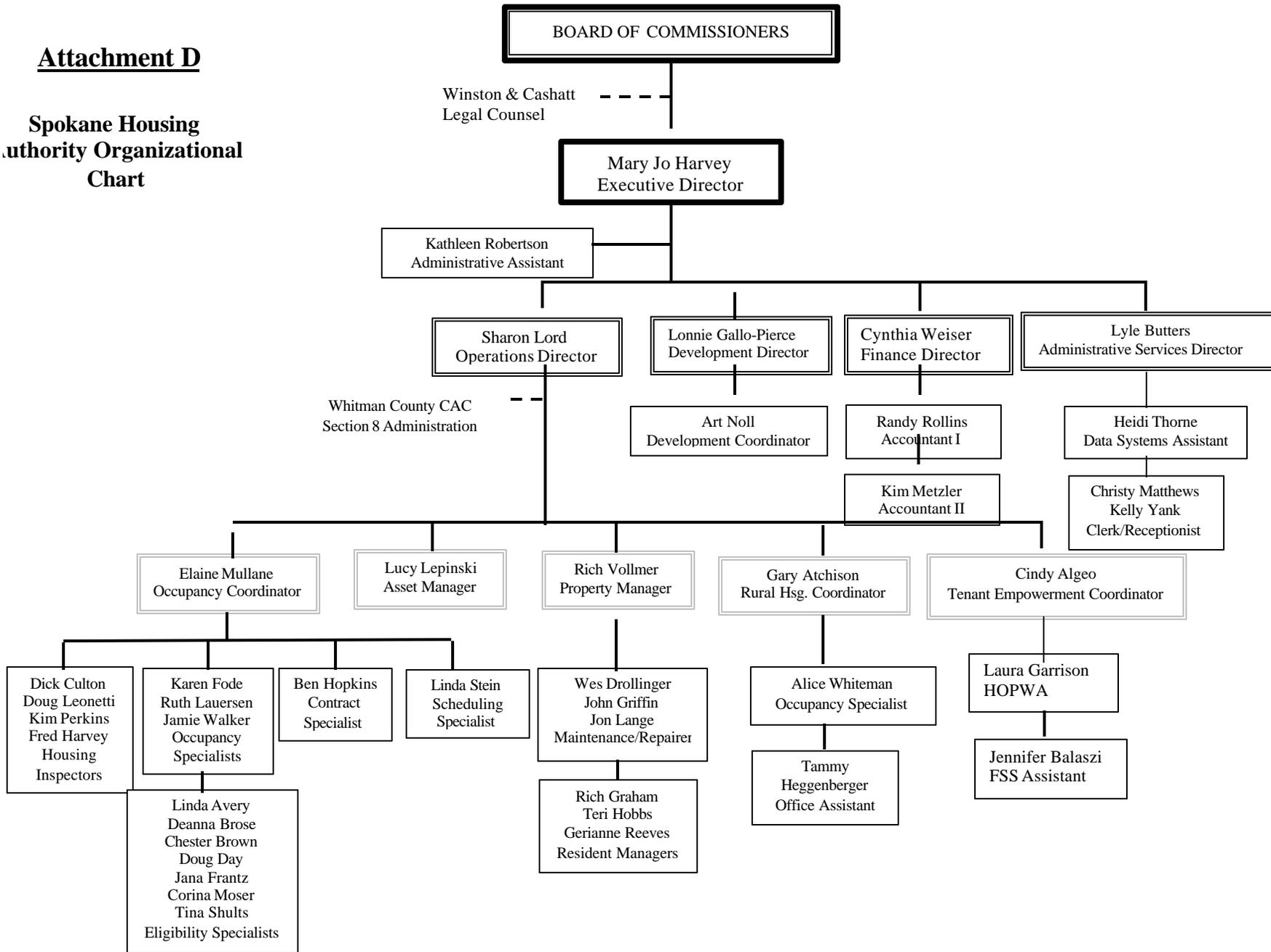
**Attachment C - Spokane Housing Authority Programs**

PROGRAM NAME	DESCRIPTION	INCOME CRITERIA	SERVICE AREA	FUNDING SOURCE	TOTAL ANNUAL FUNDING (APPROX)	UNIQUE ELGIBILITY REQUIREMENTS	NUMBER OF UNITS (EST.)
SECTION 8	TENANT BASED PRIVATE MARKET RENTAL ASSISTANCE	75% BELOW 30%; ALL BELOW 80%	4 COUNTIES: SPOKANE, PEND ORIELLE, WHITMAN, STEVENS	HUD => SHA	\$ 8,631,767		2515
SECTION 8-MAINSTREAM FOR DISABILITIES	TENANT BASED PRIVATE MARKET RENTAL ASSISTANCE	75% BELOW 30%;ALL BELOW 80%	SPOKANE AND WHITMAN COUNTIES	HUD => SHA	\$380,044	DISABLED HEAD OF HOUSEHOLD OR SPOUSE UNDER THE SOCIAL SECURITY ACT	136
SECTION 8-WELFARE-TO-WORK	TENANT BASED PRIVATE MARKET RENTAL ASSISTANCE	75% BELOW 30%; ALL BELOW 80%	4 COUNTIES: SPOKANE, PEND ORIELLE, WHITMAN, STEVENS	HUD => SHA	\$ 2,468,483	TANF RECIPIENT CURRENTLY OR WITHIN THE LAST 2 YEARS OR CURRENT TANF RECIPIENT AND WORKING; PARTICIPATION IN INDIVIDUAL RESPONSIBILITY PLAN	700
SECTION 8—FAMILY UNIFICATION	TENANT BASED PRIVATE MARKET RENTAL ASSISTANCE	75% BELOW 30%; ALL BELOW 80%	4 COUNTIES: SPOKANE, PEND ORIELLE, WHITMAN, STEVENS	HUD => SHA	\$ 417,733	REQUIRES DSHS REFERRAL— CHILDREN MUST BE SEPARATED FROM PARENTS OR AT RISK OF SEPARATION	100
SECTION 8 --SRO MOD REHAB	PROJECT-BASED RENTAL ASSISTANCE	ALL BELOW 80%	CITY OF SPOKANE	HUD => SHA	\$ 428,706	MUST BE A SINGLE ADULT AND HOMELESS	127
PUBLIC HOUSING	PROJECT-BASED AND SCATTERED SITE RENTAL ASSISTANCE	40% BELOW 30%; ALL BELOW 80%	SPOKANE COUNTY	HUD => SHA	\$ 417,998	ELIGIBILITY FOR THE PARSONS BUILDING: MUST BE OVER 55 OR DISABLED	125
HOME	TENANT BASED PRIVATE MARKET RENTAL ASSISTANCE	50% OR BELOW	SPOKANE CITY LIMITS & PEND ORIELLE	HUD => CTED & CITY OF SPOKANE => SHA	\$ 579,854	2 YEAR ASSISTANCE MAXIMUM ; HOUSING MUST BE WITHIN CITY LIMITS	111
HOPWA/CTED	TENANT BASED PRIVATE MARKET RENTAL ASSISTANCE	80% OR BELOW	12 COUNTIES: ASOTIN, FERRY, ADAMS, SPOKANE, WHITMAN, STEVENS, GARFIELD, OKANOGAN, LINCOLN, COLUMBIA, WALLA WALLA, PEND OREILLE	HUD => CTED => SHA	\$ 105,135	MUST BE DIAGNOSED WITH HIV OR AIDS	15
HOPWA/REACH	TENANT BASED PRIVATE MARKET RENTAL ASSISTANCE	50% OR BELOW	7 COUNTIES: SPOKANE, ADAMS, WHITMAN, LINCOLN, FERRY, STEVENS, PEND OREILLE	HUD => SPOKANE COUNTY => SHA	\$ 90,185	MUST BE DIAGNOSED WITH HIV OR AIDS	26
PREGNANT & PARENTING TEENS	PROJECT BASED	ALL BELOW 80%	CITY OF SPOKANE	WASHINGTON STATE TRUST FUND => SHA	\$ 12,420		6
COURTVIEW	PROJECT BASED	4 UNITS @ 30% OR BELOW; 6 UNITS @30%-50% BELOW;	CITY OF SPOKANE	BOND FINANCING; ANDTRUST FUND => SHA	\$ 46,480		14
VALLEY 206	PROJECT BASED	50% BELOW 80%;	LOCATED IN THE SPOKANE VALLEY	BOND FINANCING => SHA	\$ 1,152,177		207
HERITAGE HEIGHTS	PROJECT BASED	3% BELOW 30%, 73% BELOW 40%;	LOCATED IN NORTHEAST SPOKANE	TAX CREDIT;HOME, CDBG AND WCRA	\$ 266,138	MUST BE OVER 55 YEARS OLD	62

		24% BELOW 60%		=> SHA			
<b>WESTFALL VILLAGE</b>	PROJECT BASED	3% BELOW 30%, 73% BELOW 40%, 24% BELOW 60%	LOCATED IN NORTHEAST SPOKANE	TAX CREDIT; HOME; AND WCRA => SHA	\$ 511,346		110
<b>CEDAR WEST</b>	PROJECT BASED	50% BELOW 80%	LOCATED IN NORTHWEST SPOKANE	BOND FINANCING	\$ 399,873		74
<b>INDEPENDENT FAMILY FUTURES</b>	SUPPORT SERVICES PROGRAM; NO RENTAL ASSISTANCE		4 COUNTIES: SPOKANE, PEND ORIELLE, WHITMAN, STEVENS	HUD=>SHA	\$ 131,050	MUST BE SECTION 8 OR PUBLIC HOUSING PARTICPANT	330

**Attachment D**

**Spokane Housing  
Authority Organizational  
Chart**



## **ATTACHMENT E**

### **FINAL AGENCY PLAN RECOMMENDATIONS MADE BY RAB TO SPOKANE HOUSING AUTHORITY FOR FY2000**

#### **Board Composition / Policy-Making**

- There should be a homeless or formerly homeless person represented on the Board of Commissioners

#### **Waiting Lists / Tenant Selection**

- The waiting list is too long.
- There needs to be a way to check where you are on the list; SHA should create a means for clients on the waiting list to access their position on the list (perhaps automated and tied to SS Number).
- Make preferences easier to verify.
- Preference for homeless families with children, especially in school areas.

#### **Tenant Rent & Rent Reasonableness:**

- Some SHA Section 8 clients are confused by the Rent Reasonableness Certification Form and feel uncertain as to whether they are being asked to certify as to their unit's rent reasonableness or simply to certify that they have been informed as to it's rent reasonableness. It is therefore suggested that the SHA better define the purpose of this document and, if necessary, redesign the form to clarify it's purpose.
- The rent determination formula for determining family assistance appears that the family is penalized for adding an ineligible household member. [Note: Some RAB members concurred with the current policy and supported penalties for those who add ineligible family members.]

#### **Public Information Priorities:**

- Make information about community resources for women readily available.
- Landlords and managers need to be educated on Housing Authority programs
- Promote outreach to potential "voucher landlords". We think this is a particularly worthwhile goal and one that is consistent with recent voucher award.

#### **Tenant / Client Communications / Education:**

- There should be a clear vehicle for SRO and Public Housing Tenants to use to address grievances. All tenants need to know how to file a grievance.

- Pet Policy needs to be handed out to all Public Housing tenants as they move in and the manager can then ensure they understand the policy. All policies need to be made available to everyone.
- Tenant surveys should be part of the annual review with specific questions [such as: how does the manager treat you; when was your carpet last cleaned; how often does your caseworker contact you and when was the last contact; do you have any *new* special needs].

#### SRO Issues:

- Landlords and managers need to be educated on SRO programs and the McKinney Act.
- Any person designated by SRO owners as a "Service Coordinator" must be required to have a degree in counseling.
- There should be some periodic comparison between the generated outcomes of the three SRO's in Spokane.
- SHA should obtain, review and make public the complete applications that the SRO owners in Spokane originally made to HUD for the purposes of obtaining monies to start their projects.

#### Accessibility Issues:

- A wheelchair will not fit in the elevator at Heritage Heights. When SHA builds another building they need to ensure that it is accessible. Wheelchairs and scooters are now parked on the first floor of the building for tenants and visitors on the second floor.
- Heritage Heights elevator is not accessible to wheelchairs or scooters.
- In regard to accessibility - there needs to be a method to register all accessible buildings. For example, when landlords renew a license or something like that, they would be required to register their building as accessible on the CORD database or some other database.
- Solicit aid of local government to get information on accessible units for all rental housing in the Spokane area. Make obtaining the information from rental property owners an integrated part of a pre-existing requirement such as payment of property taxes.
- SHA should survey all landlords as to whether the rental unit is handicapped accessible.
- The disabled that use wheelchairs are housed on upper floors of the buildings; in case of fire, the elevators become inoperable.

#### Miscellaneous / Need to Clarify:

- In reference to Asset Management, the SHA should include a definition of the term "best use" as it applies to the SHA mission and policy.

#### The Agency Plan Comment Process:

- With regard to the comments and recommendations (attached) submitted by Northwest Fair Housing Alliance, Coalition of Responsible Disabled, Spokane Homeless Coalition, Northwest Justice Project,

REACH, the Women's Drop-in Center, and the Spokane Aids Network, we, the Resident Advisory Board (RAB) of the Spokane Housing Authority, wish to say the following:

While we have refrained from endorsing specifically any comments submitted by the named agencies into the RAB comments to SHA and HUD, we believe that these outside comments were generated by well-intentioned, well-informed persons and that they should be considered by the SHA and HUD in their current planning efforts.

## Attachment F

### **SPOKANE HOUSING AUTHORITY RESPONSE TO RESIDENT ADVISORY BOARD AGENCY PLAN COMMENTS AND RECOMMENDATIONS 4/2000**

#### Board Composition / Policy Making:

- The Resident Advisory Board has recommended that a homeless or formerly-homeless person be represented on the SHA Board of Commissioners. Federal Law now requires that each Housing Authority Board of Commissioners have at least one "Resident" member. That resident member may, but is not required to be a homeless or formerly homeless person. The SHA is in compliance with that provision. Appointment to the SHA Board of Commissioners, per State statute, is the responsibility of the Mayor of the City of Spokane. Generally, an attempt is made to make appointments representative of the many perspectives and areas of expertise needed to appropriately govern the SHA. Further, the Resident Advisory Board, which does have representation of the homeless or formerly homeless, will provide input to the SHA Board of Commissioners on a variety of issues. Therefore, the SHA will not at this time adopt a formal policy providing specifically that a homeless or formerly homeless person be appointed to its Board of Commissioners.

#### Waiting Lists / Tenant Selection:

- The Resident Advisory Board made four comments regarding the waiting lists and tenant selection preference systems.
  - The fact that the waiting list(s) are too long is beyond the direct control of the Housing Authority. Funding levels have been insufficient to enable the SHA to serve all those in need. Despite an annual "purge" of the waiting lists, at which time all applicants are contacted and their continued interest in housing assistance is determined, the gap between continuing housing assistance need (as reflected by the waiting lists) and available funding remains great. The SHA Agency Plan provides that the SHA will continue to seek additional resources from HUD, will continue to expand its ownership of affordable housing, and will pursue attempts to use its conduit bond capacity to assist the acquisition or development of affordable housing by other sponsors.
  - The difficulty of determining applicant status on the waiting list was noted by the RAB. Since the Agency Plan reflects the much-simplified preference system adopted by the SHA in August, 1999, it has become somewhat easier to predict the length of wait for various applicants. However, defining each applicant's status is still complicated by the many "set-aside" grants that the SHA has and by the SHA's continuing program expansion. The Housing Authority is currently developing a web-site that will provide a great deal of Program/Agency information to the public. However, it may be some time until that site can serve the function of providing individual waiting list status information. [This may become an Annual Plan objective in the next 1-2 years.]
  - The RAB recommendation that preferences be made easier to verify has been fairly well accomplished by the SHA's simplification of the entire preference system. There are no longer a dozen or so separate preference categories to "verify" just to determine waiting list status.
  - The RAB has recommended that a preference be given to homeless families with children. The SHA is reluctant to once again encumber the waiting list process with a number of preferences. Such

preferences require "verification", use a lot of staff time, tend to delay to reassignment of "turnover" units of assistance, and make it impossible to predict applicant status (since those with such preference could continually be placed ahead of those families/households already on the waiting list). However, the SHA has begun targeting its City HOME funds primarily to homeless families and those who have been victims of domestic violence. In addition, the SHA has recently sought and been awarded 100 new Section 8 vouchers specifically for those families who face possible loss of child custody due to the lack of housing or who need suitable, affordable housing to have their children returned from the foster care system. It is also expected that the SHA's new 700 Welfare-to-Work Vouchers will help many families with children who are either facing homelessness or are currently without housing. The Housing Authority will continue to seek funding that is targeted specifically to such families.

#### Tenant Rent & Rent Reasonableness:

- Concern was expressed by RAB members that some SHA Section 8 clients are confused by the Rent Reasonableness Certification Form. The SHA will review and revise this form with the goal of clarifying its purpose and making the tenant certification more understandable.
- Some RAB members expressed concern that families are "penalized" for adding an ineligible household member. [However, other RAB members noted that any such penalty is appropriate.] HUD and SHA program guidelines are very clear in regard to the need for Housing Authority verification of eligibility and pre-approval of any added adult family members. Such policies are intended to ensure that 1) only eligible persons are beneficiaries of housing assistance, that each household is paying a fair-share of its total income toward the rent, and that assisted housing units do not become over-crowded. The SHA does not feel the need to alter these policies at this time.

#### Public Information Priorities:

- The members of the Resident Advisory Board made three recommendations relating to the need for improved public information efforts on the part of the SHA.
  - The first recommendation is that the SHA should make available information about community resources for women. The SHA continues to pursue a number of efforts to provide to all its clients (applicants, residents, & program participants) useful information about community resources. These include: 1) provision of quality information / agency brochures in the SHA office lobby; 2) production of newsletters such as the monthly *IFF Update* and the quarterly *Positive Housing* that provide a wealth of information about service resources; and 3) continued training of SHA staff about community services and referral processes. The SHA looks forward to working further with the RAB to expand these efforts.
  - The second RAB recommendation in this area emphasizes the need for landlords/managers to be educated about SHA programs. The SHA fully concurs with this recommendation which is reflected in the plan goals and objectives. The SHA currently produces and distributes to approximately 1400 landlords a quarterly newsletter entitled the *Landlord Liaison*. This newsletter provides updates on regulatory changes and often announces new SHA programs. In addition, SHA's Rural Section 8 and Occupancy staff, especially its 3 rural housing staff, its 4 Inspectors and its Contract Specialist, are constantly responding to landlord/manager/owner inquiries about our programs.
  - The SHA appreciates the RAB support for one of the more important goals in its Agency Plan...that of promoting outreach to potential "voucher landlords". As indicated above, the SHA goal of adding at least 25 new participating landlords per year builds on the agency's existing outreach efforts.

#### Tenant / Client Communications / Education:

- Three RAB comments addressed the need for improved communication between the SHA and its clients.
  - The first noted the need for better client understanding of the SHA grievance / complaint procedures. While such policies already exist in the Agency Plan, SHA concurs that, especially at its briefing session, greater attention might be given to tenant/client "problem-solving", including the use of the SHA Grievance Procedure (in the Public Housing Admissions and Continued Occupancy Plan) and the SHA Complaint/Informal Review Procedure (in the Section 8 Administrative Plan). Clients should also be encouraged to determine whether their landlord has in place a grievance procedure and be encouraged to use such procedures to resolve landlord/tenant problems. Finally, all SHA staff will be provided with appropriate information to make fair housing and legal support referrals to clients who wish to further pursue various grievance procedures.
  - The second RAB recommendation in this area suggested a need to specifically explain the pet policy to all public housing tenants on move-in and to ensure that all SHA policies are available to the public. The Pet Policy has been amended to correct some perceived inequities between elderly/disabled projects and family housing and to specifically provide for such policy explanation on move-in. Further, the copies of the Agency Plan, along with all policies will be retained at each SHA office and will be available for review upon request.
  - The SHA plans to continue to implement its "one quarter per year" customer survey process. This allows the Housing Authority to secure "feedback" from residents, program participants, applicants, landlords and other customer groups. HUD will be supplementing this effort with a new resident satisfaction measure that uses a much more detailed questionnaire mailed directly to a sampling of residents. While initially this questionnaire will only be sent to Public Housing residents, it is expected that Section 8 Program Participants will be included in the future.

#### SRO Issues:

- Four issues were raised by RAB members in regard to the SRO Program. Some of these recommendations are beyond the capacity and legal authority of the Housing Authority to address.
  - In regard to the suggestion that landlords and managers need to be educated on SRO programs and the McKinney Act, such responsibility lies primarily with HUD and the SRO building owners. However, the SHA is currently in the process of developing, jointly with HUD and the NW Fair Housing Alliance, a training program targeted specifically to such owners on landlord/tenant issues and reasonable accommodation in the SRO and other service-enhanced residential environments.
  - The suggestion that "service coordinators" at SRO apartment complexes be required to have a degree in counseling is not one that is enforceable by the Housing Authority. The SHA has already included in its Section 8 Administrative Plan a provision that Annual Reports on Supportive Services will be required of SRO Owners. This will allow the Housing Authority to engage in discussions annually with the owners about the nature and effectiveness of their service plan.
  - HUD has the responsibility to monitor the outcomes of all SRO projects.
  - SHA will seek to obtain for public access the full original SRO applications.

#### Accessibility Issues:

- A number of RAB recommendations reflected the member concerns about physical accessibility to SHA housing and programs.
  - Two comments addressed the supposed limited accessibility to the elevator at Heritage Heights Apartments. The SHA is the "General Partner" of the Limited Partnership that developed and owns "Heritage Heights, a tax-credit-funded apartment complex for seniors. Since the Agency Plan does not specifically address non-HUD housing activities, it does not contain any policies for tax credit properties

such as Heritage Heights. However, it should be noted that we believe that Heritage Heights meets or exceeds accepted accessibility standards. Also, should the SHA become involved in the construction of another such complex, the Housing Authority will continue to ensure optimum levels of accessibility.

- Three comments/recommendations dealt with the need to better identify accessible housing units available in the community. One suggestion was that landlords should be required to "register" all accessible buildings when they renew a license. At this time, there is no licensing process for rental properties and no available "enforcement agency" to make this happen on a mandatory basis. A related suggestion proposed that local government assist in compiling an inventory of accessible rental housing by tying such information to the property tax assessment/payment process. Finally, it was suggested that the SHA survey all landlords as to whether their rental units are handicapped accessible. In regard to this last recommendation, SHA already does seek accessibility information when it solicits/accepts unit listings from landlords. When it was once proposed by SHA that a landlord survey be conducted to identify accessible units, advocates for the disabled noted that perceptions of accessibility are so variable that such landlord designations would be of little practical value to disabled persons seeking housing. The SHA Agency Plan contains language indicating its commitment to continue to support the efforts of CORD (Coalition of Responsible Disabled) to develop a comprehensive computerized accessible housing inventory. (The SHA provided a grant of over \$28,000 to CORD to initiate such a system.) CORD and the RAB should continue to examine, with the SHA, possible use of the Housing Authority's monthly mailings to approximately 1400 landlords as a tool to assist this effort.
- Finally, a concern was expressed that wheel-chair dependent disabled persons are often housed on upper floors of apartment buildings and face increased hardship/danger in case of fire. While the SHA recognizes this concern, fire safety professionals and fair housing advocates contend that limiting the choice of accessible housing to ground floors only is not the answer. The SHA will work with the RAB during the coming year to clarify the issues in this regard and to, if appropriate, develop new policies to guide SHA resident placement.

#### Miscellaneous / Need to Clarify:

- The Resident Advisory Board requested that the SHA further define the term "best use" as it will apply to SHA Asset Management policy. While in the world of property appraisals and market analyses, the definition of "best use" often favors commercial use over residential, the SHA Asset Management Policy clearly intends the term "best use" to reflect the mission, goals, and objectives of the Housing Authority. Therefore, the on-going assessment of "best use" for all SHA properties must reflect the most prudent decisions in the context of providing safe, affordable housing.

#### The Agency Plan Comment Process:

- The SHA has agreed with the RAB request to append to our HUD submission the written comments submitted by a variety of parties during the Plan comment period and at the SHA Plan Public Hearing. SHA will proceed to make certain procedural changes based on those comments and recommendations (such as the revision and clarification of the Reasonable Accommodation forms). Further, SHA staff will consider the remaining comments from each and work with the RAB during the coming year to determine whether any major policy changes should result.

## Attachment G

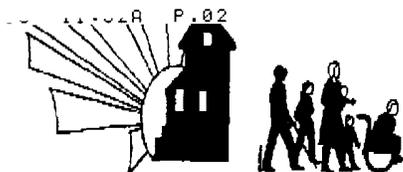
### Other Comments

FROM: NW FAIR HOUSING

FAX NO.: 5093252716

04-15-00

11:32



Northwest Fair Housing Alliance

**1613 W. GARDNER AVE., SPOKANE, WA. 99201-1830**  
**(509) 325-2665 \* (800) 200-FAIR(3247) \*. (509) 325-2716 FAX**

**March 10, 2000**

#### **Plan Comments - SHA**

Spokane Housing Authority  
55 West Mission  
Spokane, Washington 99201

To Whom It May Concern

I am writing to provide comments on the Spokane Housing Authority Proposed 5Year Plan. For the sake of clarity, let me state that I am basing these comments on the document entitled "5 -Year Plan - PHA Fiscal Years 2000 -2004" which incorporates SHA's proposed goals and objectives into HUD's strategic planning **document**. All of my references address items listed in this document.

#### **1. Objective; Increase customer satisfaction**

I recommend that the term "customer" be clearly defined. Who are the SHA's customers? Applicants for assistance? Tenants receiving assistance? Landlords who participate in SHA programs? Local public and private agencies which work in concert with the SHA to achieve common goals? I assume that all of these **might be included** in the term "customer-"

From our perspective, your customers are often our clients, and they have raised the following concerns: \* Difficulty reaching their case worker at SHA, **even when** there is an emergency \* Lack of clarity/information about SHA policies/procedures which affect their status + Lack of response by SHA **when a** Section 8 landlord engages in unfair or abusive practices towards a tenant (i.e. - shuts off utilities, enters the unit repeatedly without proper notice, fails to address needed repairs in spite of repeated requests)

Rather than an annual survey, I suggest that information about customer satisfaction be obtained at various steps during SHA contact with its customers. We all know that no one can please all of the

people all of the time, but issues which are repeatedly raised by a number of individuals should be noted and staff should be encouraged to propose and implement solutions to these problems,

Finally, keeping other agencies like ours informed about changes in your policies and procedures does help us to answer clients' questions without having to bother your very busy staff

## **2. Income-mixing in public housing and other tenant/neighborhood concerns**

While we understand HUD's interest in deconcentrating poverty, we are concerned that those who need housing the most in our community not be screened out in order to meet this goal. Implementation of programs to help tenants improve their income is another way to ensure a mix of incomes in public housing. SHA should actively promote diversity throughout its area of service. Neighbors' concerns about SHA tenants should receive a prompt response, but SHA should support its tenants rights to equal housing opportunity in our community so that "community-oriented policing" efforts are focused on actual criminal activity and not on families who happen to be different from their neighbors.

## **3. Promotion of self-sufficiency of assisted households**

We are especially concerned about the method for bringing individuals into SRO's here in Spokane. The SHA certifies the applicant's eligibility and he/she is then free to apply at three very different facilities, each one managed by a different entity. Inconsistencies in these programs lead to a number of problems - long waiting lists at some and many vacancies at others; limited choices for persons with mobility impairment due to the fact that each building has a different level of accessibility, and so on. The SHA should play a more active part in ensuring equal services and treatment for the tenants of these facilities. In addition, SHA should provide applicants with information about how to pursue a grievance or seek resolution of a problem at each of these facilities. Many of the residents of the SRO's are persons with disabilities; SHA should take steps to ensure that these individuals' rights under the federal Fair Housing Act and other applicable statutes are respected.

## **4. Ensure equal opportunity in housing**

The objectives listed under this goal are excellent. In addition, we make the following recommendations:

#Ensure that all appropriate staff of any private property management companies with which the SHA contracts receive annual fair housing training (this group should include all personnel who have contact with tenants - i.e., - on-site and off-site managers, maintenance personnel, etc.)

- \* SHA should be an active participant in community programs which foster diversity in its area of service.
- \* SHA should use its "Landlord Liaison" newsletter to provide information on the application of the fair housing laws (NWFHA would be happy to provide case studies or other helpful information for this publication).
- \* SHA should make sure that all applicants for/recipients of services are aware of their rights to equal housing opportunity. NWFHA would be happy to work with SHA in providing materials for this education/outreach.

Finally, one last comment which doesn't seem to "fit" into any of the categories listed in the plan - we urge you to take steps to ensure that tenants in all SHA properties, including the tax credit properties for which SHA is general partner, have initial lease periods of twelve months and the same rights to due process which are available to recipients of HUD-funded assistance. There is a true inequity in having those tenants subject to 20-day lease termination without cause. We feel strongly that SHA should not be offering housing assistance which is so tenuous,

Thank you for your consideration of our comments and, above all, for all of the hard work you all do to provide much-needed housing in our community!

Sincerely,

Florence R. Brassier  
Executive Director

Cc Resident Advisory Board

**Spokane AIDS Network 905 South Monroe**

**Spokane WA 99204 509.456.8993 [www.SpokaneAIDSNetwork.org](http://www.SpokaneAIDSNetwork.org)**

March 13, 2000

Mary Jo Harvey  
C/O Spokane Housing Authority  
W. 55 Mission  
Spokane, WA 99201

Dear Ms. Harvey,

I am writing this correspondence in support of the Terminally Ill Preference on the Section 8 housing application. This preference is crucial in our attempts to assist individuals living with HIV/AIDS to receive affordable and adequate housing. For the terminally ill individual, affordable/adequate housing can increase quality of life and decrease life stress.

For the person living with HIV, medication is frequently the difference between life and death. The regime for taking HIV medication is the most complex ever developed. Many clients are taking five to seven dosages per day. Most of the medication has severe side effects that require additional medication and an eating schedule of four to six times per day. Several of the HIV medications even require refrigeration for proper storage. With this in mind, stable affordable/adequate housing is essential.

In addition, the face of HIV/AIDS is changing. More and more of the new clients seeking services for the first time at SAN are sick and homeless. We can connect them to medical providers but without the housing, their chances of survival diminish greatly.

SAN has accessed your program, on behalf of our clients, for the past 10 years. Your staff has made the difference between a future for a human being or death. We urge you to retain the Terminally Ill preference on the Section 8 housing application.

Thank you for consideration of this matter.

Sincerely,

Dale Briese  
Direct Services Coordinator

Anne Stuyvesant  
Executive Director

March 6, 2000

Spokane Housing Authority  
55 W. Mission Suite 104  
Spokane, WA 99201-2398

Re: Public Comment on HUD Agency Plan

The SRO MOD REHAB units are greatly appreciated. Our agency, The Women's Drop In Center, refers homeless women to this SRO program several times each week. The three units you operate are often times the only option a person has when she not only is homeless but also has no income. The SRO program gives these women a place to call their own while they become emotionally and financially stable.

During this SHA agency planning time, I would ask that each complex be monitored so that they are clean, sober and safe dwelling sites. The management of each site needs to have qualified staff to provide the vulnerable clientele safe housing. The Commercial Building offers an excellent model. By offering in-house social services, the residents benefit from having help with all their needs. We are supportive of reducing the fee from \$25 per month to zero.

While we are appreciative of your three units, we would also like to request the possibility for a complex that specifically houses homeless women. Thank you for your consideration.

Sincerely,

Kate Fewel, MSW  
Women's Drop In Center  
218 South Howard  
Spokane, WA 99201

Michael L. Davis  
REACH Coordinator

-----  
From: Davis, Michael  
Sent: Friday, March 10, 2000 2:39 PM  
To: 'Spokane Housing Authority'  
Subject: Plan Comments -SHA  
Importance: High

I would like to submit these comments on behalf of the HIV/AIDS community. With regards to the administrative plan I would encourage the SHA to include and maintain section 8 set-asides for HIV positive individuals and their families. With regards to the HIV positive community, affordable safe housing has become a health issue. I would encourage 50-55 section 8 set-asides to be developed within the next 2-3 years. Thank you for this opportunity. Michael L. Davis REACH Coordinator

# NORTHWEST JUSTICE PROJECT

1702 W. Broadway  
Spokane, WA 99201  
(509) 324-9128 Phone/TDD  
1-888-201-1019 Toll Free  
(509) 324-0065 Fax  
[spo@nwjustice.org](mailto:spo@nwjustice.org)  
[www.nwjustice.org](http://www.nwjustice.org)

Patrick H. McIntyre  
Executive Director

March 10, 2000

Plan Comments  
Spokane Housing Authority  
55 W. Mission  
Spokane, WA 99201  
Re: Agency Plan Comments

Dear Spokane Housing Authority:

Thank you for the opportunity to comment on the Spokane Housing Authority's (SHA) draft agency plan. My comments below pertain to the documents that were available to the public to review at your office.

## **1. Five-Year Plan's Goal to Increase Customer Satisfaction.**

The draft five-year plan states on page two the goal of increasing customer satisfaction. The five-year plan states that the SHA will continue to measure customer satisfaction through SHA annual surveys. While annual surveys may help to achieve the goal of increased customer satisfaction, I think the SHA should go further. My recommendation is that the SHA conduct surveys of all those not only receiving assistance, but also for those who have applied for assistance and those who are on the waiting list. In addition, surveys should be a required element of the yearly review for each SHA client.

Surveys should also be distributed to community service organizations that serve clients receiving assistance from the SHA. A common complaint I have heard from community service organizations is that their clients can often not resolve their problems with the SHA unless the community service organization intervenes on behalf of the client. Often the client does not know whom to talk to in order to resolve their problem, but the community service organization can make contact with the SHA and resolve the problem. In essence, it often seems that only through outside help can a client resolve their problem. The SHA should strive to become more accessible to its clients.

I think greater emphasis should be placed on increasing customer satisfaction by making every effort to work with clients to resolve any problems between the client and the SHA. Surveys of all clients, applicants and community service organizations will give the SHA a greater awareness of what problems people face in working with the SHA.

## **2. Promote the Delivery of Quality Support Systems to Owners of SROs.**

On page four of the five-year plan, the SHA states that it will promote the delivery of quality support systems to owners of SRO Moderate Rehab Projects. I think that the SHA should do all it can to ensure that SROs fulfill their obligations to their tenants. A common complaint I have heard about some SROs is poor upkeep, poor security, and lack of services.

I understand that the SHA briefs tenants about the SRO program before the tenants can move into an SRO. However, it is my experience that many SRO residents do not understand the relationship among the SRO owner, the SHA, and HUD. SRO residents should be provided specific information concerning the role of each entity. In addition, a grievance procedure should be in place along with a list of appropriate officials at HUD or the SHA that can be contacted to deal with specific problems an SRO owner will not correct.

## **3. Ensure Annual Training of All SHA Staff in Fair Housing Principles and Procedures.**

Page four of the five-year plan states that all SHA staff will be trained in fair housing principles and procedures. I think that such training will be highly beneficial to ensure that SHA clients will be treated as the federal Fair Housing Act requires. However, I think that the SHA can take further steps to ensure that the needs of people with disabilities are addressed.

It is my experience that individuals with disabilities are sometimes terminated from SHA programs for their inability to comply with program requirements. Often, the inability to comply with program requirements is a direct result of the disability. To terminate an individual for behavior that directly results from a handicap is discriminatory.

The SHA has been willing to provide special assistance when requested on behalf of disabled individuals. Unfortunately, too many disabled people do not know that assistance in the form of a reasonable accommodation is available, and they are unable to access the help they need to fulfill program requirements. Apparently, information regarding the reasonable accommodation rights of clients and applicants is not adequately transmitted to clients and applicants.

A greater effort should be made to ensure that all applicants and participants in SHA programs know at the outset that they can request a reasonable accommodation for their disability. Such accommodations should include help with completion and submission of forms, follow-up contact on missed appointments or deadlines, and notification to a designated advocate when informational requests or adverse notices are pending. Client orientations and briefings should include a presentation from a community fair housing advocate.

Notices of adverse action should include language that reasonable accommodations can be made if the participant's failure to comply with program requirements is a result of the participant's disability. Participants should also be given the number of a person at the SHA they can call if the participant thinks a reasonable accommodation is needed to comply with program requirements.

#### **4. Section 8 Program Eligibility and Admissions Policies.**

I strongly support the SHA's policy of targeting at least 75% of its new admissions to households that have income 30% or below the area median income. However, I think the SHA should have a preference for large families with school age children requiring three or more bedrooms. In addition, there should be a preference for families paying 50% or more of their income for housing costs.

The current SHA policy of omitting rent burdened households from the preferences blurs the SHA's focus on helping extremely low-income families. It is high rent burden that most readily identifies the poorest of the families and reveals their long-term need for housing assistance. As the Consolidated Plan reveals, there are many families in Spokane paying more than 50% of their income for housing.

For large families with school age children there is a shortage of available affordable housing with three or more bedrooms, while the need for residential security is the greatest. There are children that move to different schools three or more times in the course of the school year due to housing instability. Stable secure housing means children are able to stay in the same school for the entire school year. Unstable housing due to high costs means families are often forced to move and change schools.

I urge the SHA to have preferences for those paying 50% or more of their income for housing and for those families with school age children that require three or more bedrooms.

#### **5. Public Housing Admissions Policies.**

##### **Higher Income Tenants.**

I am concerned by the statement contained in Goal 4 of the Executive Summary of the agency plan which states the intention of the SHA to bring higher-income households into lower-income developments. The goal is to achieve poverty deconcentration.

First, while HUD's regulations do contemplate PHA discretion to allocate up to 60% of public housing units to higher income families, they do so only as necessary to serve a purpose of "deconcentration" that I do not think pertains to the SHA. See 24 C.F.R. § 903.7(c)(2). The purpose is to avoid concentrations of poor people in large public housing development. The

SHA does not have any such large developments. It only has 125 public housing units and most of the units are dispersed. Accordingly, I can see no justification to allocate these valuable units to higher-income families.

Second, the plan does not indicate whether the SHA has done the necessary demographic assessment to justify such an allocation. HUD's regulations provide a deconcentration measurement of compliance that the SHA must use to assess the demographics of its population. The SHA must "consider what admissions policy measures or incentives, if any, will be needed to bring higher-income families into lower-income developments, and lower-income families into higher-income developments and buildings." 24 C.F.R. § 903.7(c)(2)(ii).

The SHA must first undertake this assessment before it allocates any units to higher income families. It is possible that such an assessment will show that the SHA can achieve the deconcentration compliance while limiting the allocation to families within the range of income under 30% of A.M.I.:

The rule provides that PHAs shall be considered to be in compliance with the deconcentration requirements if they determine the average household income in such developments and define higher-income families as those with incomes over 115% of this average, higher-income developments as those where the average family income is over 115% of this average, lower-income families as those with incomes under 115% of this average and lower-income developments as those where the average income is under 115% of this average.

64 Fed. Reg. 56854 (October 21, 1999); 24 C.F.R. § 903.7(c)(2)(i).

Third, there are other ways to promote economic deconcentration without limiting the admission of low-income families. For example, the SHA can focus efforts on increasing the income of residents and then encouraging them to remain as their incomes rise.

Fourth, I am concerned about the fair housing implications of an allocation of public housing units to higher-income families and its effect on families of color, families headed by women, families with children and disabled persons. It is well known that in the aggregate these families are traditionally poorer than white families, families headed by two parents, families without children and households without disabled persons.

In pursuing deconcentration, the SHA must not only refrain from policies that have unintended discriminatory effects, the SHA policies "must affirmatively further fair housing." 24 C.F.R. § 903.7(c)(2)(ii). I do not think that allocating scarce public housing resources to higher income families is consistent with the SHA's fair housing obligations. At the very least, the SHA should analyze the fair housing consequences of allocating its public housing units to higher-income families.

### **Preferences in Public Housing for Those Who Work.**

I am very concerned by the proposed SHA preference in public housing for people who work. The fair housing implications are substantial. Many people cannot work because of disability. Again, the SHA has the obligation to affirmatively further fair housing. The working preference would seem to be at odds with that duty as it appears to discriminate against those who cannot work.

### **6. Minimum Rents.**

I strongly support the SHA's proposal to drop the minimum rent from \$25.00 to \$0.00. This policy will enable families facing financial crises to maintain their housing.

### **7. Homeownership.**

I strongly support the SHA's decision not to use Section 8 subsidies to help households make mortgage payments. There is such a great a need in our community for rental assistance, that I think all Section 8 resources should be applied to rental assistance only.

### **8. Termination of Assistance.**

I am very concerned about the investigative process the SHA uses that leads to termination of families from housing assistance. Frequently SHA staff, acting on sometimes anonymous information, terminate families on assistance without first giving the families a warning to come into compliance with SHA policies.

I think many families could maintain their assistance if they were first given at least one chance to come into compliance with SHA policies. I also think that the SHA would then not have to devote valuable resources to time-consuming investigations. Many families may need a reminder of SHA policies so that they can come into compliance.

### **9. Notice of Hearing Rights.**

On pages 76 and 77 of the Section 8 draft, the SHA gives tenants ten business days to request a hearing after notification of adverse action, such as termination from assistance. "Notification" is not defined. Does it mean when the notice is mailed or when it is received? Often, SHA clients will not receive the notice until well after it is mailed.

In order to assure that Section 8 participants have sufficient time to request a hearing after adverse action, I think notification should be defined as when the notice of adverse action is received. I also recommend that the notice define what is meant by "business days." Finally, I recommend that it be SHA policy to call the client to verify that they received the notice.

Plan Comments  
March 10, 2000  
Page 6

Thank you again for the opportunity to comment. The SHA provides a very valuable service to those most in need in our community. It is a pleasure working with SHA staff and I hope that our good relationship will continue in the future.

Sincerely yours,

NORTHWEST JUSTICE PROJECT

John O'Rourke  
Staff Attorney

jo/ac

# Spokane Homeless Coalition

**C/o Human Services, City of Spokane 808 West Spokane Falls Boulevard Spokane, WA99201-3333  
Telephone (509)625-6103 Fax (509)625-6777**

v  
March 3, 2000  
Spokane Housing Authority  
55 W. Mission  
Spokane, WA 99201

To Whom It May Concern:

The Spokane Homeless Coalition is a group of 85 People from local profit, non-profit, and governmental agencies, as well as interested citizens. Our mission is to ensure the provision of a comprehensive continuum of care, which assists homeless persons in learning the skills required for successful living, and to increase community awareness of homelessness through public education and advocacy.

We, the Spokane Homeless Coalition, would like to endorse your new 5-year plan. We are very excited about the possible increase of 700 units of permanent housing and the increase to serve over 4000 individuals and families. We are delighted to see that your organization recognizes the problems associated with locating housing for victims of domestic violence, by setting aside 100 family reunification vouchers for this type of instability. In addition, we are thrilled to see the minimum rent decrease from \$25.00 to \$0 for Section 8 and Public Housing.

However, we are very concerned with the drop of preferences for individuals and families living in sub-standard housing and paying more than 50% of their income for rent and utilities (rent burden). We see these as the two leading factors in the cause of homelessness. Therefore, we propose that these be added to your current list of preferences.

We would like to see the Spokane Housing Authority continue their focus on those individuals and families who are extremely low income, as well, as develop programs for sub groups like victims of domestic violence, homeless, and families requiring 3 or more bedrooms.

We would also like to see more training in customer service dealing with people of different abilities and backgrounds. We would like to suggest giving surveys to customers-meaning individuals both already in a program and those starting to apply or in the application process--as well as surveys to agencies that are referring clients to the Housing Authority. We think surveys with would help determine how the Housing Authority can effectively assist clients, potential clients, and agencies in the community. By sharing the results with the community the Housing Authority will show how they are increasing customer satisfaction.

Sincerely,

Martha Grier  
Spokane Homeless Coalition Leadership Team

Gerriann Reeves

T.J. Sather

## Coalition of Responsible Disabled

March 10, 2000

Spokane Housing Authority  
55 W. Mission  
Spokane, WA 99201

RE: SPOKANE HOUSING AUTHORITY - Proposed changes and 5-year plan

Coalition of Responsible Disabled (CORD) recommends the following:

1. All programs owned or administered by the SHA should have an "Emergency Fee Adjustment" clause so that if a tenant loses an income source (i.e. a spouse dies), the tenant's rent can be adjusted. (Currently under some housing subsidies, tenants are forced to move because they no longer can afford their housing, for example; at Westphal Village Apartments your rent does not decrease if your income decreases, causing tenants financial hardship therefore having to move)
2. Disabled individuals with cognitive, mental or literacy issues should be clearly informed that they have the option of being accompanied by an advocate to ensure that paperwork and procedures are understood. Also, reminder calls may be in order for people who claim memory problems.
3. SHA workers should undergo disability sensitivity training, particularly for folks with hid-den disabilities, such as learning disabilities, brain injuries and mental/emotional issues.
4. Fair market rent for individuals who use wheel chair accessible apartments need to be raised because most fully accessible units CORD- is aware of have been built within the last ten years. Rents reflect this. (CORD has 400+ apartments on their accessibility register. According to 1-998--99 data approximately 7% are at fair market rate determine by HUD. Few of these are affordable for folks who qualify for SHA services.)
5. We ask that SHA continue the policy of service preference for the extremely low-income.
6. Regarding the issue of the SHA satisfaction survey: CORD believes that individuals on the waiting lists should be surveyed as well those being placed in or currently occupying housing through your program. We feel that people constitute the status of "consumer".
7. Housing safety (5 year plan, p.3 PHA Goal: Improved Living Environment).  
In addition to "working with local law authorities and community oriented policing," perhaps SHA can initiate some "inter-complex7 projects to improve race relations, disability awareness and "Setting to know and like your neighbors" (helping to foster creation of peer support/natural helper systems rather than rely solely on outside enforcement).
8. SHA should make grievance/due process procedure readily available to consumers, especially for SRO residents.
9. Needs more accessible SRO units (only two of the three units can handle wheelchair users).
10. We have an understanding that the three SRO's have varying compliance criteria.

We recommend that the SRO's eligibility and compliance criteria be explained to potential residents. People needing ground level units need be told which SRO's can accommodate or not.

Thank you for allowing CORD to provide our recommendations. If you have further questions, please feel free to contact me at 326-6355.

Sincerely,

Kathy Coster, ILCII/MSW

**PUBLIC HEARING**  
**3/14/00**

**Public Hearing to solicit comments on the SHA Agency Plan 2000**

SHA Board of Commissioners Chairman Janet Bastine conducted the hearing. The SHA Commissioners introduced themselves. The Resident Advisory Board introduced themselves.

Laura Garrison reviewed the requirements under the QHWRA (Quality Housing and Work Responsibility Act) of 1998, as part of that legislation housing authorities were required to implement agency plans.

Testimonies:

**Health District - Michael Davis, REACH Coordinator**

Wanted to encourage the SHA to set aside 50-55 section 8 vouchers for HIV individuals and their families that are receiving housing so they can continue to get housing.

**Jeremy Street - RAB**

The Rent Reasonableness Certificate that people that are in Section 8 subsidized housing are requested to fill out. This form has ambiguity and is meaningless. As the form is constructed it is the SHA Inspector who is determining the reasonableness or unreasonableness of the rent for any given unit. The tenant is only being advised by SHA on the reasonableness of the rent for the unit. I am confused as to the purpose of the document, if it is as I would assume, to establish if the tenant feels the rent is reasonable then the purpose is not being met because the tenant is only witnessing the fact that he/she has been told that it is reasonable. Defining the purpose of the document seems prudent.

In the case of the Wilton, where I reside, I do not believe the rooms would be considered reasonable based on a comparison with "the private unassisted market" which is the sole logical criteria used to establish rent reasonableness on the form in question. The rents at the Wilton are about \$350, I doubt any real estate agent would agree that this is reasonable based on a comparison with the private market.

Suggested action: define the purpose of the document and rewrite the document to serve the purpose if necessary.

I have always felt intuitively that monetary mark up between what is charged for the room and what is reasonable is probably intended by HUD to be money directed toward social services for the tenants but perhaps this was never true. If it were true, then the discrepancy would be justified.

**John Zichko - RAB**

In terms of the Commercial Building, it seems the standard rent is uniform but the square footage of living space is very different. This should be jumped on real quick before someone gets a bug and goes to court. I think as a taxpayer this should bother you.

**John O'Rourke - NW Justice Project**

**1) Page 4 of the Five-Year Plan**

Promote the delivery and quality support systems to owners of SRO's - SHA should do all they can to insure the SRO's fulfill their obligation to their tenants. Common complaints from SRO tenants is poor upkeep, poor security, lack of services and poor management. I understand the housing authority briefs people going into the SRO's however, it is my experience the SRO tenants don't understand the relationship between the SRO owner, SHA, and HUD. SRO residents should be provided specific information concerning the role of each entity. I suggest some sort of grievance procedure should be in place along with a list of appropriate officials the tenants can contact at either HUD or the housing authority in case they have a problem. A lot of times it is difficult dealing with the SRO owners and the housing authority is pumping all this money into the SRO's for rent and it needs to become more clear to the tenants what the housing authority can do, what HUD can do.

## **2) Page 4 of the Five-Year Plan**

Ensure annual training of all housing authority staff in Fair Housing principles & procedures. I think such training would be highly beneficial to insure H.A. clients will be treated as state and federal law requires. I think SHA can take further steps to insure the needs of people with disabilities are addressed. Individuals with disabilities are sometimes terminated from SHA programs for their inability to comply with program requirements. Often the inability to comply with the program requirements is directly related to the disability. It is my understanding that under federal law that to terminate individuals for behavior that directly results from a handicap is discriminatory.

In some cases I do have clients that I get before they are terminated from housing or who have special needs because of their disability. In other cases when I contact SHA they are willing to work with me and the client and are willing to make a reasonable accommodation. Unfortunately many disabled individuals don't know that a reasonable accommodation is available and they are unable to fulfill the program requirements. Apparently, information regarding reasonable accommodation rights of clients is not being adequately transmitted to clients and applicants. A greater effort should be made to insure that all applicants on SHA programs know at the outset they can request a reasonable accommodation. Such accommodation should include,- help with completing forms, follow up contacts on missed appointments or deadlines, and notification to a designated advocate when informational requests or adverse actions is pending. One way to insure that SHA adequately transmits this information to clients regarding their rights is orientations and briefings should include a presentation from a community fair housing advocate.

When a termination notice is sent to a client, it should include language if your failure to comply with program requirements is due to a disability you have a right to request a reasonable accommodation.

A common thread running throughout my client's problems is they need a contact at SHA. It is often hard to get through. Many service agencies can get through to the housing authority and resolve problems, but they are the one that has to do that, they know the person to call but the client doesn't know.

## **3) Section 8 Program Eligibility and Admissions Policies**

Support SHA's policy targeting at least 75% of new admissions to households with income 30% or below median. Recommend the housing authority have a preference for large families with school age children requiring three or more bedrooms. Also, recommend a preference for families paying 50% or more of their income for housing. Omitting the preference for rent burdened households blurs the housing authority's focus on helping extremely low income families. There are a great number of families in Spokane paying more than 50% of their income for housing costs. Also, there is a shortage of large family homes in Spokane. Some school districts in Spokane, the student body is sometimes 50% different from the day school starts until the day

school ends. We need to make an effort to provide stable and secure housing so kids aren't changing schools two, three or four times during the school year.

#### **4) Public Housing Admissions Policies**

I am concerned about the statement in Goal 4 of the Executive Summary which states the H.A. wants to attract higher income households to low income developments. HUD regulations do contemplate the H.A.'s discretion to allocate up to 60% of public housing units to higher income families, only as necessary to serve a purpose of deconcentration, I don't think the deconcentration policy should be applicable to Spokane. Deconcentration policies were meant to apply to larger housing authorities such as Philadelphia, Chicago, Boston. In Spokane we have about 125 public housing units, the majority are dispersed. I can't see justification to allocate valuable housing to higher income people.

SHA should use some of its efforts to promote the raising of incomes from within the housing authority's properties. There are various ways Section 3 job training, family self-sufficiency program. By trying to attract higher income people there are very serious fair housing implications to that. By skipping over people you are having a real effect on families of color, families headed by women, families with children and disabled persons. It is well known that in the aggregate these families are traditionally poorer than white families, families headed by two parents, families without children and households without disabled persons.

HUD regulations not only require H.A.'s to refrain from policies that have discriminatory effects, but HUD regulations require that the H.A. must affirmatively further fair housing. I don't see how skipping over low-income people to attract high-income people the H.A. is doing that.

#### **5) Preference in Public Housing for Those Who Work**

The H.A. proposes to have a preference for those who work. I think there is another fair housing implication here. Many people cannot work because of a disability. Again, the H.A. has the obligation to affirmatively further fair housing skipping over disabled people so people that are working have preference I think that's discriminatory.

#### **6) Minimum Rents**

I strongly support the H.A. dropping the minimum rents from \$25 to \$0.

#### **7) Home Ownership**

Strongly support the H.A. choosing not to use Section 8 subsidies to help households make mortgage payments.

#### **8) Termination of Assistance**

I'm very concerned about the investigative process the H.A. uses that leads to termination of families from housing assistance. The H.A. has discretion over HUD regulations in most cases not to terminate someone if they are violating housing authority policies. Too often I've seen the H.A. respond to anonymous tips that people are breaking H.A. policies and following it up with a lengthy time consuming investigation. I think these resources would be better spent by at least giving a person one chance to comply with regulations or policies they might be breaking, before they are terminated. I recommend as part of H.A. policy giving a person at least one chance to come into compliance before they're terminated. Perhaps by a letter saying that we have

information that you may be violating H.A. policy in this manner, if you do not come into compliance within so many days, you will be terminated -- something like that.

#### **9) Pages 76 & 77 the Section 8 draft**

The H.A. gives tenants ten business days to request a hearing after notification of adverse action. Notification is not defined - is it after the notice is mailed, or after the notice is received -- that term needs to be defined, I would recommend that it be after the notice is received. Many times I get clients that get a notice after the time has expired or right before the time is expired. Part of that I would like the H.A. to also define in the notice what business day means, some of our clients don't know what business days are.

I would like the H.A. when they send out an adverse notice to try to make contact with the person to determine whether they have actually received the notice. Many people say they never got the notice and the time has expired.

#### **John Zichko - RAB**

As far as notification goes, you're dealing with an aspect of law for presumption of regularity with the U.S. Mail is based on. You put it in the mail, they got it. They got the notice, they go to your office crying looking for a way out after two weeks of drinking. I'm for taking \$25 and putting it aside even though they take the \$25 and booze it up.

Jan Bastine stopped the remarks (no discussion was required)

#### **Florrie Bassier - Director, NW. Fair Housing Alliance**

The contact I have with H.A. clients and mine are often characterized by the fact that a crisis is occurring. The first problem seems to be the client and I have a difficult time communicating with the caseworker or someone at the H.A. It shouldn't be that if you have a crisis you have a name to get to on the inside. Maybe there needs to be someone responsible each day in the H.A. to deal with calls that appear to be of an urgent nature. I had a case of a mother of four Section 8 recipient who was being threatened for water turn off because of unpaid utility bills by the landlord. The landlord doesn't care. The H.A. said that this is not their business, this is not the first time I've heard this. I understand it's a difficult line to walk to entice private landlords to participate in renting to Section 8. On the other hand, I do have to ask the question, when does it become the H.A.'s business. If a landlord is leaving a family of five with no water for days at a time, should we still be paying that landlord that federal subsidy. If the landlord doesn't understand that because they are dealing with a person with a disability as a tenant, and they know that, it is wise to grant reasonable accommodation before moving to evict. Is it the H.A.'s job to take an active role in informing the landlord about the fair housing law.

The fair housing laws are very complicated they change all the time. Recommend fair housing training be offered, not only to property management staff but to all the staff within the H.A.

We would be more than delighted as an organization to provide information and assistance in communicating fair housing to the staff. If SHA has a newsletter to landlords how about letting us offer some case studies about the application of fair housing laws for that newsletter.

The last issue I would like to address has a little to do with deconcentration and how we deal with public housing in the community. There is a section in the planning document about cooperating and working with programs like Safe Streets and BlockWatch and while our organization applaud programs in the neighborhoods we also have some

concerns that these programs not be used in a way to discourage people from coming into a neighborhood. Be immediately responsive to issues dealing with different people, how can the neighborhood be diverse and still work together.

**John Zichko - RAB**

The rules shouldn't be vague. In our building the federal law says you have to be there 80% of the time, they're not there 80% of the time. I will go to federal court. Something has to be done. We have 600 people waiting for SRO's while somebody is living in two or three different houses and can't control themselves. There's a place for people who can't control themselves. I think I was the first to pop-off about the grievance issue. If you can't get anything done, go to HUD they're more than willing to do something. But you don't want to go to HUD because there will be more paperwork. It's alright to listen to long-winded people but I get fed up when they don't really grasp what's going on because they don't take the time to even go into a building. They see the aftermath of the problems.

**Patsy Dunn - Landlord**

One of the things I read into this plan to help people with disabilities or maybe even people with three children versus two children. Most of my units are two bedroom. That really narrows it down if you're a person with HIV or single, the price range as long as it's within a certain guideline, I think that criteria should sometimes be looked at to say this person can have a two bedroom because the financial situation surrounding that is still the same. The same situation if you are a woman alone with three kids. Maybe you could live in a two bedroom apartment. It's my understanding that if you have three children they have to be separated by sex. If you have two boys and one girl then you can share the bedroom with your daughter but you have to have a room for the boys. If a single woman (from the private sector) comes to me and wants to rent a two bedroom unit she can rent it. But if the woman is on housing and she has no kids, the two bedroom is not available to her. Suggest the rules on this be relaxed especially when the price range is appropriate.

**Robert Ingram**

What SHA does is important to the community. The comment I would like to make is at the Spokane County Health, I didn't get the hearing announcement flyer until today. It's hard to have a good turnout when people get the notice too late. (Laura said it wasn't mailed to every client it was given to you by your case manager).

**J.P. Swim - RAB**

Why does a landlord refuse to deal with you if (if you're being faithful) when you don't have good credit. They want \$20 dollars to check this and they're not going to let you in. Need clarification to landlords to get educated.

The housing authority should also be sure that an apartment that is being rented to a disabled person is accessible.

Hearing closed 6:15 p.m.