

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

Small PHA Plan Update
Annual Plan for Fiscal Year: 2002

MADISON HOUSING AUTHORITY
SMALL PHA PLAN UPDATE
ANNUAL PLAN FOR FISCAL YEAR 2002

**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: MADISON HOUSING AUTHORITY

PHA Number: NC054

PHA Fiscal Year Beginning: (01/2002)

PHA Plan Contact Information:

Name: Diane Pritchett

Phone: 336-548-6619

TDD: 800-735-2962

Email (if available):

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

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
Main administrative office of the local, county or State government
Public library
PHA website
Other (list below)

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

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

PHA Programs Administered:

Public Housing and Section 8 Section 8 Only Public Housing Only

Annual PHA Plan

Fiscal Year 2002

[24 CFR Part 903.7]

i. Table of Contents

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

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1. Summary of Policy or Program Changes for the Upcoming Year

In this section, briefly describe changes in policies or programs discussed in last year’s PHA Plan that are not covered in other sections of this Update.

There are no anticipated changes in policies or programs.

2. Capital Improvement Needs

[24 CFR Part 903.7 9 (g)]

Exemptions: Section 8 only PHAs are not required to complete this component.

A. Yes No: Is the PHA eligible to participate in the CFP in the fiscal year covered by this PHA Plan?

B. What is the amount of the PHA’s estimated or actual (if known) Capital Fund Program grant for the upcoming year? \$ _Unknown for 2002_____

C. Yes No Does the PHA plan to participate in the Capital Fund Program in the upcoming year? If yes, complete the rest of Component 7. If no, skip to next component.

D. Capital Fund Program Grant Submissions

(1) Capital Fund Program 5-Year Action Plan

The Capital Fund Program 5-Year Action Plan is provided as Attachment C

(2) Capital Fund Program Annual Statement

The Capital Fund Program Annual Statement is provided as Attachment B

3. Demolition and Disposition

[24 CFR Part 903.7 9 (h)]

Applicability: 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 next component ; if “yes”, complete one activity description for each development.)

2. Activity Description N/A

Demolition/Disposition Activity Description (Not including Activities Associated with HOPE VI or Conversion Activities)

1a. Development name: 1b. Development (project) number:

2. Activity type: Demolition Disposition

3. Application status (select one) Approved Submitted, pending approval Planned application

4. Date application approved, submitted, or planned for submission: (DD/MM/YY)

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

7. Relocation resources (select all that apply) Section 8 for units Public housing for units Preference for admission to other public housing or section 8 Other housing for units (describe below)

8. Timeline for activity: a. Actual or projected start date of activity: b. Actual or projected start date of relocation activities: c. Projected end date of activity:

4. Voucher Homeownership Program

[24 CFR Part 903.7 9 (k)]

A. 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 next component; if “yes”, describe each program using the table below (copy and complete questions for each program identified.)

B. Capacity of the PHA to Administer a Section 8 Homeownership Program

The PHA has demonstrated its capacity to administer the program by (select all that apply): N/A

Establishing a minimum homeowner downpayment requirement of at least 3 percent and requiring that at least 1 percent of the downpayment comes from the family’s resources

Requiring that financing for purchase of a home under its section 8 homeownership will be provided, insured or guaranteed by the state or Federal government; comply with secondary mortgage market underwriting requirements; or comply with generally accepted private sector underwriting standards

Demonstrating that it has or will acquire other relevant experience (list PHA experience, or any other organization to be involved and its experience, below):

5. Safety and Crime Prevention: PHDEP Plan

[24 CFR Part 903.7 (m)]

Exemptions Section 8 Only PHAs may skip to the next component PHAs eligible for 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?

B. What is the amount of the PHA’s estimated or actual (if known) PHDEP grant for the upcoming year? \$ N/A

C. Yes No Does the PHA plan to participate in the PHDEP in the upcoming year? If yes, answer question D. If no, skip to next component.

D. Yes No: The PHDEP Plan is attached at Attachment _____

6. Other Information

[24 CFR Part 903.7 9 (r)]

A. Resident Advisory Board (RAB) Recommendations and PHA Response

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

2. If yes, the comments are Attached at Attachment (File name) G

3. In what manner did the PHA address those comments? (select all that apply)

The PHA changed portions of the PHA Plan in response to comments

A list of these changes is included

Yes No: below or

Yes No: at the end of the RAB Comments in Attachment _____.

Considered comments, but determined that no changes to the PHA Plan were necessary. An explanation of the PHA’s consideration is included at the at the end of the RAB Comments in Attachment _____.

Other: (list below)

B. 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) State of North Carolina
- 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 specific initiatives contained in the Consolidated Plan. (list such initiatives below)

*Other: (list below)

. PHA Requests for support from the Consolidated Plan Agency

Yes X No: Does the PHA request financial or other support from the State or local government agency in order to meet the needs of its public housing residents or inventory? If yes, please list the 5 most important requests below:

- 4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below) There is a need for a additional housing for extremely low income families and elderly families and families with disabilities.

5.

C. Criteria for Substantial Deviation and Significant Amendments

1. Amendment and Deviation Definitions

24 CFR Part 903.7(r)

PHAs are required to define and adopt their own standards of substantial deviation from the 5-year Plan and Significant Amendment to the Annual Plan. The definition of significant amendment is important because it defines when the PHA will subject a change to the policies or activities described in the Annual Plan to full public hearing and HUD review before implementation.

A. Substantial Deviation from the 5-year Plan:

B. Significant Amendment or Modification to the Annual Plan:

Attachment A

Supporting Documents Available for Review

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

List of Supporting Documents Available for Review

Applicable & On Display	Supporting Document	Related Plan Component
--	----------------------------	-----------------------------------

X	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations	5 Year Annual Plans
	State/Local Government Certification of Consistency with the Consolidated Plan (not required for this update)	5 Year Annual Plans
X	Fair Housing Documentation Supporting Fair Housing Certifications: 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 Annual Plans
X	Housing Needs Statement of the Consolidated Plan for the jurisdiction/s in which the PHA is located and any additional backup data to support statement of housing needs in the jurisdiction	Annual Plan: Housing Needs
X	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources
X	Public Housing Admissions and (Continued) Occupancy Policy (A&)/ACOP), which includes the Tenant Selection and Assignment Plan (TSAP)	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Any policy governing occupancy of Police Officers in Public Housing. Check here is included in the public housing A&O Policy	Annual Plan: Eligibility, Selection, and Admissions Policies
	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public housing rent determination policies, including the method for setting public housing flat rents. Check here if included in the public housing A&O Policy	Annual Plan: Rent Determination
X	Schedule of flat rents offered at each public housing development Check here if included in the public housing A&O Policy	Annual Plan: Rent Determination
	Section 8 rent determination (payment standard) policies Check here if included in the public housing A&O Policy	Annual Plan: Rent Determination
X	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation)	Annual Plan: Operations & Maintenance
X	Results of latest binding Public Housing Assessment System (PHAS) Assessment	Annual Plan: Management & Operations
X	Follow-up Plan to Results of the PHAS Resident Satisfaction Survey (if necessary)	Annual Plan: Operations and Maintenance & Community Service & Self-Sufficiency
	Results of latest Section 8 Management Assessment System (SEMAP)	Annual Plan: Managements & Operations

	Any required policies governing any Section 8 special housing types Check here if included in Section 8 Administrative plan	Annual Plan: Operations and Maintenance
X	Public housing grievance procedures Check here is included in the public housing A & O Policy	Annual Plan: Grievance Procedures
	Section 8 informal review and hearing procedures Check here is included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
X	The HUD-approved Capital Fun/Comprehensive Grant Program Annual Statement (HUD 52837) for any active grant year	Annual Plan: Capital Needs
X	Most recent CIAP Budget/Progress Report (HUD52825) for any active CIAP grants	Annual Plan: Capital Needs
	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
X	Self-evaluation, Needs Assessment and Transition Plan required by regulations implementing s504 of the Rehabilitation Act and the Americans with Disabilities Act. See PIH 99-52 (HA)	Annual Plan: Capital Needs
	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition
	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing
	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, Section 22 of the US Housing Act of 1937, or Section 33 of the US Housing Act of 1937	Annual Plan: Conversion of Public Housing
	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership
	Policies governing any Section 8 Homeownership program (section of the Section 8 Administrative Plan)	Annual Plan: Homeownership
	Cooperation agreement between the PHA and the TANF agency and between the PHA and local employment and training service agencies	Annual Plan: Community Service & Self-Sufficiency
	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-sufficiency
	Section 3 documentation required by 24 CFR Part 135, Subpart E	Annual Plan: Community Service & Self-Sufficiency
	Most recent self-sufficiency (ED/SS, TOP or ROSS or	Annual Plan:

	other resident services grant) grant program reports	Community Service & Self-Sufficiency
	The most recent Public Housing Drug Elimination Program (PHDEP) semi-annual performance report	Annual Plan: Safety and Crime Prevention
	<p>PHDEP-related documentation: Baseline law enforcement services for public housing developments assisted under the PHDEP Plan: Consortium agreement's between the PHA's participating in the consortium and a copy of the payment agreement between the consortium and HUD (applicable only to PHA's participating in a consortium as specified under 24 CFR761.15): Partnership agreements (indicating specific leveraged support) with agencies/organizations providing funding, services or other in-kind resources for PHDEP-funded activities: Coordination with other law enforcement efforts: Written agreement(s) with local law enforcement agencies (receiving any PHDEP funds); and All crime statistics and other relevant data (including Part I and specified Part II crimes) that establish need for the public housing sites assisted under the PHDEP Plan.</p>	Annual Plan: Safety and Crime Prevention
X	<p>Policy on Ownership of Pets in Public Housing Family Developments (as required by regulation at 24 CFR Part 960, Subpart G) Check here is included in the public housing A & O Policy</p>	Pet Policy
X	The results of the most recent fiscal year audit of the PHA conducted under section 5 (h)(2) of the US 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 PHA's: MOA/Recovery Plan	Troubled PHA's
	Other supporting documents (optional) (list individually: use as many lines as necessary)	(specify as needed)

**Annual Statement/Performance and Evaluation Report Capital Fund
Program and Capital Fund Program Replacement Housing Factor
(CFP/CFPRHF) Part 1: Summary Attachment “B, Part I”**

PHA Name: **MADISON HOUSING AUTHORITY** Grant Type and Number: Capital Fund
 Program: Capital Fund Program NC19P05450100 Replacement Housing Factor Grant No:

Original Annual Statement Reserve for Disasters/
Emergencies Revised Annual Statement (revision no:) Performance and Evaluation Report for
Period Ending: Final Performance and Evaluation Report

Line No. Summary by Development Account		Total Estimated Cost		Tota
		Original	Revised	Obli
1	Total non-CFP Funds			
2	1406 Operations	10,000		
3	1408 Management Improvements	7,000		
4	1410 Administration	5,000		
5	1411 Audit			
6	1415 liquidated Damages			
7	1430 Fees and Costs	7,000		
8	1440 Site Acquisition			
9	1450 Site Improvement	40,000		
10	1460 Dwelling Structures	60,000		
11	1465.1 Dwelling Equipment-Nonexpendable	9,000		
12	1470 Nondwelling Structures			
13	1475 Nondwelling Equipment	1,600		
14	1485 Demolition			
15	1490 Replacement Reserve			
16	1492 Moving to Work Demonstration			
17	1495.1 Relocation Costs			
18	1498 Mod Used for Development			
19	1502 Contingency			
20	Amount of Annual Grant: (sum of lines 2-19)			
21	Amount of line 20 Related to LBP Activities			
22	Amount of line 20 Related to Section 504 Compliance			
23	Amount of line 20 Related to Security			
24	Amount of line 20 Related to Energy Conservation Measures			

**Annual Statement/Performance and Evaluation Report Capital Fund
 Program and Capital Fund Program Replacement Housing Factor
 (CFP/CFPRHF) Part II: Supporting Pages Attachment “B, Part II”**

PHA Name: MADISON HOUSING AUTHORITY Grant Type and Number Capital Fund
 Program #: Capital Fund Program NC19P05450100 Replacement Housing Factor #: Federal FY of
Grant:2002

Development Number	General Description of Major Work Categories	Dev. Acct No.
Quantity	Total Estimated Cost 139,600	
Total Actual Cost	Status of Proposed	

Name/HA-Wide Activities
 NC-54 DALTON HOMES

Original	Revised	Funds Obligated	Funds Expended	Work
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Annual Statement/Performance and Evaluation Report Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part III: Implementation Schedule

PHA Name: MADISON HOUSING AUTHORITY Grant Type and Number Capital Fund Program #: NC19P05450100 Capital Fund Program Replacement Housing Factor #: Federal FY of Grant: 2002

Development Number Name/HA-Wide Activities Date)	All Funds Expended (Quarter Ending Date)			All Fund Obligated (Quart Ending Date) Reasons for Revised Target		
	Original	Revised	Actual	Original	Revised	Actual
NC-54 Dalton Homes	12/31/2003			12/31/2004		

Capital Fund Program 5-Year Action Plan Attachment C

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.

2001-2005

CFP 5-Year Action Plan x Original statement Revised statement		
Development Number- NC-54	Development Name (or indicate PHA wide)	
	PHA wide (Dalton Homes)	
Description of Needed Physical Improvements or Management Improvements	Estimated Cost	Planned Start
Replace water heaters	12,000	2001
Replace bathroom sinks with vanity-sink combo	10,000	2001
Digital Camera	750	2001
Swing bar door guards	375	2001
Replace stoves and refrigerators as needed	10,000	2001-2005
Landscaping	40,000	2001-2005
Wide-angle door viewer	800	2002
Replace Bathroom floors	50,000	2002
Update bathroom lighting	10,000	2003
Replace storm doors and thresholds	10,000	2002-2004
Install bi fold doors in laundry and hall	6,400	2003
Replace kitchen sinks	50,000	2003-2005
Replace asphalt parking lot	15,000	2001
Purchase computer for uniform physical condition standard inspection	10,000	2001-2002
Training for conducting the inspections	1,200	2001-2002
Drop Box for Office	200	2001
Freon	1,000	2001
Total estimated cost over next 5 years	\$227,725	

PHA Public Housing Drug Elimination Program Plan
ATTACHEMENT D

Not applicable. Madison Housing Authority is ineligible for PHDEP funding.

Required Attachment E : Resident Member on the PHA Governing Board

1. Yes No: Does the PHA governing board include at least one member who is directly assisted by the PHA this year? (if no, skip to #2)

A. Name of resident member(s) on the governing board:

B. How was the resident board member selected: (select one)?

Elected

Appointed

C. The term of appointment is (include the date term expires):

2. A. If the PHA governing board does not have at least one member who is directly assisted by the PHA, why not?

the PHA is located in a State that requires the members of a governing board to be salaried and serve on a full time basis

the PHA has less than 300 public housing units, has provided reasonable notice to the resident advisory board of the opportunity to serve on the governing board, and has not been notified by any resident of their interest to participate in the Board.

Other (explain):

B. Date of next term expiration of a governing board member:

C. Name and title of appointing official(s) for governing board (indicate appointing official for the next position):

Required Attachment ___ F ___ : Membership of the Resident Advisory Board or Boards

List members of the Resident Advisory Board or Boards: (If the list would be unreasonably long, list organizations represented or otherwise provide a description sufficient to identify how members are chosen.)

Minnie Joyce
Barbara Davis
Thelma Cardwell
Gene Williams
Robert Durham
James Duggins
Rosie Lowe
James Gallant
Linda Kellam
Lillie Vernon
O.G. Tatum

All residents were given a notice about the Resident Advisory Board and asked to attend a meeting if they were interested in serving on the Advisory Board.

Attachment G

Resident Advisory Board Comments and PHA Response

Residents wanted to improve the appearance of the property. Therefore we have budgeted for additional landscaping.

Residents expressed support for continuing the Resident ID, Automobile Registration and Guest Pass Program, which will be continued.

The Mission Statement and Goals and Objectives of the Five Year Plan remain the same.

Attachment H

Statement of Progress in Meeting the 5-Year Plan Goals

Goal: To continue to better communications between the Residents and the PHA.

Progress: Meeting will continue between the Residents and the PHA to keep Residents and RAB posted on the plans, activities, and HUD requirements.

Goal: To continue the advancement and progress of communication between the PHA and local government.

Progress: The alliance with the Town and Governmental agencies has continued to advance through heightened information and communication.

Goal: Install Air Condition in all units.

Progress: Through CIAP 1999 & CFG 2000, air conditioning will be installed in all family units by October 2001.

Goal: To guarantee MHA is financially accountable and responsible.

Progress: Responsibilities and obligations were within the budget and there were no audit findings.

Goal: Maintain current, and attract possible future residents with an adequate occupancy time to allow them to become self-sufficient.

Progress: Initiated ceiling rents and held a high rate of occupancy.

Goal: To sustain HA physical assets.

Progress: To identify future maintenance needs the REAC inspections will act as a guide. An inventory of maintenance supplies and non-expendable supplies was done.

- To bring to a conclusion the MHA, Board, Staff and RAB will move ahead on monitoring and assessing our program under the Agency Five-Year Plan.

Attachment I

Voluntary Conversion of Public Housing to Tenant-Based Assistance. Public Housing Certifications

On June 22, 2001, the Department of Housing and Urban Development (HUD) issued a Final Rule amending chapter IX of title 24 of the Code of Federal Regulations by adding part 972. This new part 972 implements section 533 of the Quality Housing and Work Responsibility Act of 1998 which requires every public housing authority to conduct and submit to HUD an initial assessment to determine if statutory objective would be satisfied by converting certain developments or parts of developments to tenant-based assistance.

Acting of behalf of the MADISON HOUSING AUTHORITY (PHA) as its Authorized Official, I make the following certifications and assurance to HUD regarding:

Project No. NC 054

Project Name: Dalton Homes

Project Address: 925 Fern Street, Madison, NC 27025

I hereby certify that the development named above:

- Is not Subject to required conversion under 24 CFR part 971;
- Is not the subject of an application for demolition or disposition that has been approved by HUD, or submitted to HUD and awaiting determination;
- Is not a HOPE VI revitalization site; and
- Is not designated for occupancy by the elderly and/or persons with disabilities.

I further certify that I have:

- Reviewed the development's operation as public housing;
- Considered the implications of converting the public housing to tenant-based assistance; and
- Concluded that the conversion of the development may be:
 - Appropriate because removal of the development would meet the necessary conditions for voluntary conversion described below.
 - Inappropriate because removal of the development would not meet the necessary conditions for voluntary conversion described below.

Necessary conditions for voluntary conversion:

- **Conversion to tenant-based assistance would not be more expensive than continuing to operate the development (or portion of it) as public housing;**
- **Conversion to tenant-based assistance would principally benefit the residents of the public housing development to be converted and the community; and**
- **Conversion to tenant-based assistance would not adversely affect the availability of affordable housing in the community.**

Signed by: Diane Pritchett
Executive Director

Date: 09/24/01

**MADISON HOUSING AUTHORITY
DALTON HOMES**

**INITIAL ASSESSMENT OF CONVERSION OF PUBLIC HOUSING
TO TENTANT-BASED ASSISTANCE**

The Section 8 rents in the area are based on the Fair Market Rent for the area and are as follows:

Without Utility Allowance	With Utility Allowance
1BR \$275	\$374
2BR 325	454
3BR 425	585
4BR 500	664
 \$275 x 18 units= \$4,950	 \$374 x 18 units= \$6,732
325 x 14 units= 4,550	454 x 14 units= 6,356
425 x 14 units= 5,950	585 x 14 units= 8,190
500 x 4 units= 2,000	664 x 4 units= 2,656
 Total \$17,450 per month	 Total \$23,934 per month
Divided by 50 units = \$349 average rent per unit per month.	Divided by 50 units = \$478.68 average rent per unit per month.

Current funding for fiscal year 2000 for Dalton Homes

Capital Fund Grant 2000	\$ 98,739
HUD subsidy	94,371
 Total	 193,110

\$193,000 divided by 600 (unit months available per year-----50 units x 12months)
= \$321.85 average rent

Based on the above, it appears the tenant rent will be higher if MHA is converted to tenant-based assistance.

Based on the above, it appears conversion to tenant-based assistance will not be a benefit to the residents of MHA.