

SmallPHAPlanUpdate
AnnualPlanforFiscalYear: 2003

**COLUMBUSHOUSINGAUTHORITY
AGENCYPLAN**

**NOTE:THISPHAPLANSTEMPLATE(HUD50075)ISTOBECOMPLETEDIN
ACCORDANCEWITHINSTRUCTIONSLOCATEDINAPPLICABLEPIHNOTICES**

PHA Plan Agency Identification

PHAName: ColumbusHousingAuthority

PHANumber: NE104

PHAFiscalYearBeginning: 10/2003

PHA Plan Contact Information:

Name: Howard R. Smith

Phone: 402 -564-1131

TDD: 402 -564-1131

Email (if available): howard@columbushousingauthority.com

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
255440th Ave.; Columbus, NE 68601 -8519
- 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
 [24CFR 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 filename in parentheses in the space to the right of the title.

Contents	<u>Page#</u>
Annual Plan	
i. Executive Summary (optional)	
ii. Annual Plan Information	
iii. Table of Contents	
1. Description of Policy and Program Changes for the Upcoming Fiscal Year	1
2. Capital Improvement Needs	1
3. Demolition and Disposition	1
4. Homeownership: Voucher Homeownership Program	3
5. Crime and Safety: PHDEP Plan	3
6. Other Information:	
A. Resident Advisory Board Consultation Process	4
B. Statement of Consistency with Consolidated Plan	4
C. Criteria for Substantial Deviations and Significant Amendments	5
D. Conversion of Public Housing to Tenant-Based Assistance	6
Attachments	
<input checked="" type="checkbox"/> Attachment A: Supporting Documents Available for Review	
<input checked="" type="checkbox"/> Attachment B: Performance and Evaluation Report	
<input checked="" type="checkbox"/> Attachment B : Capital Fund Program Annual Statement	
<input checked="" type="checkbox"/> Attachment C: Capital Fund Program 5 Year Action Plan	
<input type="checkbox"/> Attachment __: Capital Fund Program Replacement Housing Factor Annual Statement	
<input type="checkbox"/> Attachment __: Public Housing Drug Elimination Program (PHDEP) Plan	
<input checked="" type="checkbox"/> Attachment D: Resident Membership on PHA Board or Governing Body	
<input checked="" type="checkbox"/> Attachment E: Membership of Resident Advisory Board or Boards	
<input checked="" type="checkbox"/> Attachment F: Comments of Resident Advisory Board or Boards, Explanation of PHA Response, and Public Hearing.	
<input checked="" type="checkbox"/> <u>Other:</u>	
Attachment G: Voluntary Conversion to Section 8	

ii.ExecutiveSummary

[24CFR Part903.79(r)]

AtPHAoption,provideabriefoverviewoftheinformationintheAnnualPlan

NotRequired

1.SummaryofPolicyorProgramChangesfortheUpcomingYear

Inthissection,brieflydescribechangesinpoliciesorprogramsdiscussedinlast year'sPHAPlanthatarenotcovered inothersectionsofthisUpdate.

None

2.CapitalImprovementNeeds

[24CFRPart903.79(g)]

Exemptions:Section8onlyPHAsarenotrequiredto completethiscomponent.

A. Yes No: IsthePHAeligibletoparticipateintheCFPinthefiscalyear coveredbythisPHAPlan?

B. WhatistheamountofthePHA'sestimatedoractual(ifknown)CapitalFund Programgrantfortheupcomingyear? \$ 108,175

C. Yes No DoesthePHAplantoparticipateintheCapitalFundProgramin theupcomingyear?Ifyes,completetherestofComponent7.Ifno,skiptonext component.

D.CapitalFundProgramGrantSubmissions

(1)CapitalFundProgram 5 -YearActionPlan

TheCapitalFundProgram5 -YearActionPlanisprovidedasAttachment C

(2)CapitalFundProgramAnnualStatement

TheCapitalFundProgramAnnualStatementisprovidedasAttachment B

3.D emolitionan dDisposition

[24CFRPart903.79(h)]

Applicability:Section8onlyPHAsarenotrequiredto completethissection.

1. Yes No: DoesthePHAplantconductanydemolitionordisposition activities(pursuantto section18oftheU.S.HousingActof1937 (42U.S.C.1437p))intheplanFiscalYear?(If“No”,skiptonext component;if“yes”,completeoneactivitydescriptionforeach development.)

2. Activity Description

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 <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: (DD/MM/YY)	
5. Number of units affected:	
6. Coverage of activity (select one) <input type="checkbox"/> Part of the development <input type="checkbox"/> Total development	
7. Relocation resources (select all that apply) <input type="checkbox"/> Section 8 for units <input type="checkbox"/> Public housing for units <input type="checkbox"/> Preference for admission to other public housing or section 8 <input type="checkbox"/> 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:	

Component 3, (6) Deconcentration and Income Mixing

- a. Yes No: Does the PHA have any general occupancy (family) public housing developments covered by the deconcentration rule? If no, this section is complete. If yes, continue to the next question.
- b. Yes No: Do any of these covered developments have average incomes above or below 85% to 115% of the average incomes of all such developments? If no, this section is complete.

If yes, list these developments as follows

Deconcentration Policy for Covered Developments			
Development Name :	Number of Units	Explanation (if any) [see step 4 at §903.2(c)(1)(iv)]	Deconcentration policy (if no explanation) [see step 5 at §903.2(c)(1)(v)]

4. Voucher Homeownership Program

[24CFR Part 903.79(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 24CFR 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):

- Establishing a minimum homeowner down payment requirement of at least 3 percent and requiring that at least 1 percent of the down payment 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

[24CFR Part 903.7(m)]

Exemptions Section 8 Only PHAs may skip to the next component PHA eligible for PHDEP funds must provide a PHDEP Plan meeting specified requirements prior to receipt of PHDEP funds.

- A. 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? \$ _____

- 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

[24CFR Part 903.79(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 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 Changes listed in Attachment
 - 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 end of the RAB Comments in Attachment.
 - Other: (list below) – Considered comments and offered an immediate solution (i.e., parking by laundry, move thermostat in apartment).

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: State of Nebraska Non-Entitlement Areas
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 need 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: The 2005-2009 Consolidated Plan does not quantify housing needs.

3. PHA Requests for support from the Consolidated Plan Agency
 Yes 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: The 2005-2009 State of Nebraska Consolidated Plan calls for maintaining existing and creating additional affordable housing. In this sense the efforts of Columbus Housing Authority to maintain the public housing inventory is consistent with the State Consolidated Plan.

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:

Any changes in the mission statement and/or strategies to implement the mission of the authority would be considered a substantial deviation from the 5-year Plan. Changes that result from HUD mandates are excluded.

b. Significant Amendment or Modification to the Annual Plan:

Significant amendments or modifications to the annual plan apply to changes in budget items and capital fund projects. Changes that result from changes in regulations and other HUD mandates that are excluded.

D. Conversion of Public Housing to Tenant -Based Assistance

[24CFR Part 903.79(j)]

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

A. Assessment of Reasonable Revitalization Pursuant to section 202 of the HUD FY1996 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 FY1996 HUD Appropriations Act? (If "No", skip to component 11; if "yes", complete one activity description for each identified development, unless eligible to complete a streamlined submission. PHAs completing streamlined submissions may skip to component 11.)

2. Activity Description

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

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

U.S.DepartmentofHousingandUrbanDevelopment
OfficeofPublicandIndianHousing

SmallPHAPlanUpdate
AnnualPlanforFiscalYear: 2003

COLUMBUSHOUSINGAUTHORITY

ATTACHMENTA

**NOTE:THISPHAPLANSTEMPLATE(HUD50075)ISTOBECOMPLETEDIN
ACCORDANCEWITHINSTRUCTIONSLOCATEDINAPPLICABLEPIHNOTICES**

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
4	PHA Plan Certification of Compliance with the PHA Plans and Related Regulations	5 Year and Annual Plans
N/A	State/Local Government Certification of Consistency with the Consolidated Plan (not required for this update)	5 Year and Annual Plans
4	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 jurisdiction to implement any of the jurisdictions’ initiatives to affirmatively further fair housing that require the PHA’s involvement.	5 Year and Annual Plans
N/A	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
4	Most recent board -approved operating budget for the public housing program	Annual Plan: Financial Resources
4	Public Housing Admissions and (Continued) Occupancy Policy (A&O/ACOP), which includes the Tenant Selection and Assignment Plan [TSAP]	Annual Plan: Eligibility, Selection, and Admissions Policies
-	Any policy governing occupancy of Police Officers in Public Housing <input type="checkbox"/> check here if 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
✓	Public housing rent determination policies, including the method for setting public housing flat rents <input type="checkbox"/> check here if included in the public housing A&O Policy	Annual Plan: Rent Determination
✓	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
✓	Section 8 rent determination (payment standard) policies <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
✓	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
4	Results of latest binding Public Housing Assessment System (PHAS) Assessment	Annual Plan: Management and Operations

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Related Plan Component
N/A	Follow-up Plan to Results of the PHAS Resident Satisfaction Survey (if necessary)	Annual Plan: Operations and Maintenance and Community Service & Self-Sufficiency
✓	Results of latest Section 8 Management Assessment System (SEMAP)	Annual Plan: Management and Operations
✓	Any required policies governing any Section 8 special housing types <input type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Operations and Maintenance
4	Public housing grievance procedures <input type="checkbox"/> check here if included in the public housing A&O Policy	Annual Plan: Grievance Procedures
✓	Section 8 informal review and hearing procedures <input type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
4	The HUD -approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for any active grant year	Annual Plan: Capital Needs
4	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grants	Annual Plan: Capital Needs
N/A	Approved HOPEVI applications or, if more recent, approved or submitted HOP EVI Revitalization Plans, or any other approved proposal for development of public housing	Annual Plan: Capital Needs
4	Self-evaluation, Needs Assessment and Transition Plan required by regulations implementing § 504 of the Rehabilitation Act and the Americans with Disabilities Act. See, PIH 99 -52 (HA).	Annual Plan: Capital Needs
N/A	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition
N/A	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing
4	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 Refer also to attachment G	Annual Plan: Conversion of Public Housing
N/A	Approved or submitted public housing home ownership programs/plans	Annual Plan: Homeownership
N/A	Policies governing any Section 8 Homeownership program (section _____ of the Section 8 Administrative Plan)	Annual Plan: Homeownership
N/A	Cooperation agreement between the PHA and the TANF agency and between the PHA and local employment and training service agencies. <u>There is no written agreement</u>	Annual Plan: Community Service & Self-Sufficiency
N/A	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
N/A	Section 3 documentation required by 24 CFR Part 135, Subpart E	Annual Plan: Community Service & Self-Sufficiency

List of Supporting Documents Available for Review

Applicable & On Display	Supporting Document	Related Plan Component
N/A	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports	Annual Plan: Community Service & Self-Sufficiency
N/A	The most recent Public Housing Drug Elimination Program (PHDEP) semi-annual performance report	Annual Plan: Safety and Crime Prevention
N/A	PHDEP-related documentation: <ul style="list-style-type: none"> · Baseline law enforcement services for public housing developments assisted under the PHDEP plan; · Consortium agreement/s between the PHAs participating in the consortium and a copy of the payment agreement between the consortium and HUD (applicable only to PHAs participating in a consortium as specified under 24 CFR 761.15); · 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. 	Annual Plan: Safety and Crime Prevention
4	Policy on Ownership of Pets in Public Housing Family Developments (as required by regulation at 24 CFR Part 960, Subpart G) <input type="checkbox"/> check here if included in the public housing A&O Policy	Pet Policy
4	The results of the most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h)), the results of that audit and the PHA's response to any findings	Annual Plan: Annual Audit
N/A	Troubled PHAs: MOA/Recovery Plan	Troubled PHAs
	Other supporting documents (optional) (list individually; use as many lines as necessary)	(specify as needed)

Small PHA Plan Update
Annual Plan for Fiscal Year: 2003

COLUMBUS HOUSING AUTHORITY

ATTACHMENT B

Performance and Evaluation Report

**Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1:
Summary**

PHAName: Columbus Housing Authority	Grant Type and Number Capital Fund Capital Fund Program Grant No: NE26P104501-00 Replacement Housing Factor Grant No:	Federal FY of Grant: 2000
-------------------------------------	---	------------------------------

Original Annual Statement
 Reserve for Disasters/Emergencies
 Revised Annual Statement (revision no:)
 Performance and Evaluation Report for Period Ending: 3/31/02
 Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
1	Total non -CFP Funds				
2	1406 Operations	\$11,413.00		11,413.00	11,413.00
3	1408 Management Improvements Soft Costs	\$6,846.00		6,846.00	6,846.00
	Management Improvements Hard Costs				
4	1410 Administration				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	\$15,000.00		15,000.00	15,000.00
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment — Nonexpendable				
12	1470 Nondwelling Structures	\$70,000.00		70,000.00	70,000.00
13	1475 Nondwelling Equipment	\$10,846.00		10,846.00	10,846.00
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs				
18	1499 Development Activities				
19	1502 Contingency				
	Amount of Annual Grant: (sum of lines 2 -19)	\$114,105.00		114,105.00	114,105.00

**Annual Statement/Performance and Evaluation Report
 Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1:
 Summary**

PHAName: Columbus Housing Authority	Grant Type and Number Capital Fund Capital Fund Program Grant No: NE26P104501-00 Replacement Housing Factor Grant No:	Federal FY of Grant: 2000
-------------------------------------	---	------------------------------

Original Annual Statement
 Reserve for Disasters/Emergencies
 Revised Annual Statement (revision no:
 Performance and Evaluation Report for Period Ending: 3/31/02
 Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
	Amount of line XX Related to LBP Activities				
	Amount of line XX Related to Section 504 compliance				
	Amount of line XX Related to Security --Soft Costs				
	Amount of Line XX related to Security --Hard Costs				
	Amount of line XX Related to Energy Conservation Measures				
	Collateralization Expenses or Debt Service				

Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)
Part III: Implementation Schedule

PHAName: COLUMBUS Housing Authority		Grant Type and Number Capital Fund Program No: Replacement Housing Factor No :					Federal FY of Grant: 2000
Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)			All Funds Expended (Quarter Ending Date)			Reasons for Revised Target Dates
	Original	Revised	Actual	Original	Revised	Actual	
NE104	9/30/02	-	9/30/02	9/30/03	-	9/30/03	

**Annual Statement/Performance and Evaluation Report
 Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1:
 Summary**

PHAName: Columbus Housing Authority	Grant Type and Number Capital Fund Program Grant No: NE26P104501-01 Replacement Housing Factor Grant No:	Federal FY of Grant: 2001
--	---	-------------------------------------

Original Annual Statement Reserve for Disasters/Emergencies Revised Annual Statement (revision no: 03)
 Performance and Evaluation Report for Period Ending: 3/31/03 Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
1	Total Non -CFP Funds				
2	1406 Operations	29,910		29,910.00	29,910.00
3	1408 Management Improvements Soft Costs	1,000		1,000.00	1,000.00
4	1410 Administration				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	500		313.54	313.54
8	1440 Site Acquisition				
9	1450 Site Improvement	32,000		23,926.86	23,926.86
10	1460 Dwelling Structures	19,000		16,438.25	16,438.25
11	1465.1 Dwelling Equipment — Nonexpendable				
12	1470 Nondwelling Structures	2,000		1,652.64	1,652.64
13	1475 Nondwelling Equipment	32,000		16,634.88	16,634.88
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs				
18	1499 Development Activities				
19	1502 Contingency				
20	Amount of Annual Grant: (sum of lines 2 -19)	116,410		89,876.17	89,876.17
21	Amount of line 20 Related to LBP Activities				
22	Amount of line XX Related to Section 504	\$3,750.00		\$3,554.31	\$3,554.31

Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1:
Summary

PHAN Name: Columbus Housing Authority	Grant Type and Number Capital Fund Program Grant No: NE26P104501-01 Replacement Housing Factor Grant No:	Federal FY of Grant: 2001
--	---	-------------------------------------

Original Annual Statement
 Reserve for Disasters/Emergencies
 Revised Annual Statement (revision no: 03)
 Performance and Evaluation Report for Period Ending: 3/31/03
 Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
	compliance				
	Amount of line XX Related to Security --Soft Costs				
	Amount of Line XX related to Security --Hard Costs				
	Amount of line XX Related to Energy Conservation Measures				
	Collateralization Expenses or Debt Service				

Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)
Part II: Supporting Pages

PHAName: ColumbusHousingAuthority		GrantTypeandNumber CapitalFundProgramGrantNo: ReplacementHousingFactorGrantNo:				FederalFYofGrant: 2001			
Development Number Name/HA-Wide Activities	GeneralDescriptionofMajorWork Categories	Dev. AcctNo.	Quantity	TotalEstimatedCost		TotalActualCost		Statusof Work	
				Original	Revised	Funds Obligated	Funds Expended		
NE104	Operations	1406		29,910		29,910.00	29,910.00	Done	
	ComputersandTraining	1408		1,000		1,000.00	1,000.00	Done	
	A&EFees	1430		500		313.54	313.54		
	<ul style="list-style-type: none"> • Privacy Fence • Concrete • Additional Parking • Landscaping • FrontEntrance(504) • SprinklerSystem 	1450		32,000		9,379.68 3,498.00 5,175.00 797.96 3,554.30 1,521.92	23,926.86		
	<ul style="list-style-type: none"> • Carpets(5) • HVAC • SmokeDetectors 	1460		19,000		2,100.00 14,338.25	16,438.25		
	RemainingOfficeAddition	1470		2,000		1,652.64	1,652.64		
	<ul style="list-style-type: none"> • Pickuptruck • RidingMower • Phone system • Officeandmaintenanceequipment 	1475		32,000		16,634.88	16,634.88		
	Total			116,410		89,876.17	89,876.17	77%	

Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (C FP/CFPRHF)
Part III: Implementation Schedule

PHAName: COLUMBUS Housing Authority			Grant Type and Number Capital Fund Program No: Replacement Housing Factor No:			Federal FY of Grant: 2001	
Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)			All Funds Expended (Quarter Ending Date)			Reasons for Revised Target Dates
	Original	Revised	Actual	Original	Revised	Actual	
NE104	3/31/03	-	3/31/03	9/30/04		9/30/04	

**Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1:
Summary**

PHAName: Columbus Housing Authority	Grant Type and Number Capital Fund Program Grant No: NE26P104501-02 Replacement Housing Factor Grant No:	Federal FY of Grant: 2002
-------------------------------------	--	------------------------------

Original Annual Statement Reserve for Disasters/Emergencies Revised Annual Statement (revision no: 02)
 Performance and Evaluation Report for Period Ending: Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
1	Total Non - CFP Funds				
2	1406 Operations	32,175	32,175	\$32,175.00	\$32,175.00
3	1408 Management Improvements Soft Costs	1,000	1,000		
4	1410 Administration		0		
5	1411 Audit		0		
6	1415 Liquidated Damages		0		
7	1430 Fees and Costs	500	3,000		
8	1440 Site Acquisition		0		
9	1450 Site Improvement	15,000	17,000		
10	1460 Dwelling Structures	46,000	45,000		
11	1465.1 Dwelling Equipment — Nonexpendable		2,500		
12	1470 Non Dwelling Structures	2,500	2,500		
13	1475 Non Dwelling Equipment	11,000	5,000		
14	1485 Demolition		0		
15	1490 Replacement Reserve		0		
16	1492 Moving to Work Demonstration		0		
17	1495.1 Relocation Costs		0		
18	1499 Development Activities		0		
19	1502 Contingency		0		
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$108,175	108,175	\$32,175.00	\$32,175.00
21	Amount of line 20 Related to LBP Activities	\$4,000	\$4,000		

**Annual Statement/Performance and Evaluation Report
 Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1:
 Summary**

PHAName: Columbus Housing Authority	Grant Type and Number Capital Fund Program Grant No: NE26P104501-02 Replacement Housing Factor Grant No:	Federal FY of Grant: 2002
-------------------------------------	--	------------------------------

Original Annual Statement
 Reserve for Disasters/Emergencies
 Revised Annual Statement (revision no: 02)
 Performance and Evaluation Report for Period Ending:
 Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
22	Amount of line XX Related to Section 504 compliance	5,000	5,000		
	Amount of line XX Related to Security --Soft Costs				
	Amount of Line XX related to Security --Hard Costs				
	Amount of line XX Related to Energy Conservation Measures				
	Collateralization Expenses or Debt Service				

Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)
Part II: Supporting Pages

PHAName: Columbus Housing Authority		Grant Type and Number Capital Fund Program Grant No: NE26P104501-01 Replacement Housing Factor Grant No:			Federal FY of Grant: 2002			
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Obligated	Funds	
NE104	Operations	1406		32,175	32,175	32,175	32,175	Comp.
	Management Improvement	1410		1,000	1,000			
	Fees & costs (HVAC Consultant)	1430		3,000	3,000			
	<u>Site Improvement:</u> • Resurface east parking lot • Electric distribution system	1450		15,000	5,000 12,000			
	<u>Dwelling Structure:</u> • HVAC • Flooring • Units' Upgrade (e.g. lighting above sink/pantry, smoke detector) • Ranges & Refrigerators	1460		15,000 5,000 20,000 6,000	24,000 5,000 16,000 0			
	<u>Dwelling Equipment — Nonexpendable</u> • Ranges & Refrigerators	1465.1			2,500			
	<u>Nondwelling Structures:</u> • West laundry • HVAC & Upgrade	1470		2,500 0	0 2,500			
	<u>Nondwelling Equipment:</u> • Maintenance equipment • Office furniture & Equip. • Power projector	1475		1,000 6,000 4,000	1,000 4,000 0			
	TOTAL			\$108,175	\$108,175			

Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)
Part III: Implementation Schedule

PHAName: Columbus Housing Authority		Grant Type and Number Capital Fund Program No: Replacement Housing Factor No:				Federal FY of Grant : 2002	
Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)			All Funds Expended (Quarter Ending Date)			Reasons for Revised Target Dates
	Original	Revised	Actual	Original	Revised	Actual	
NE104	9/30/04	-		9/30/05	-		

**Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1:
Summary**

PHAName: Columbus Housing Authority	Grant Type and Number Capital Fund Program Grant No: NE26P104501-03 Replacement Housing Factor Grant No:	Federal FY of Grant: 2003
-------------------------------------	--	------------------------------

Original Annual Statement Reserve for Disasters/Emergencies Revised Annual Statement (revision no: 02)
 Performance and Evaluation Report for Period Ending: Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
1	Total non -CFP Funds				
2	1406 Operations	32,175	5,000		
3	1408 Management Improvements Soft Costs	1,000	1,000		
4	1410 Administration				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	500	500		
8	1440 Site Acquisition				
9	1450 Site Improvement	35,000	59,675		
10	1460 Dwelling Structures	26,000	27,500		
11	1465.1 Dwelling Equipment — Nonexpendable	0	2,500		
12	1470 Nondwelling Structures	5,000	2,500		
13	1475 Nondwelling Equipment	8,500	9,500		
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs				
18	1499 Development Activities				
19	1502 Contingency				
20	Amount of Annual Grant: (sum of lines 2 - 19)	108,175	108,175		
21	Amount of line 20 Related to LBP Activities	\$4,000	\$4,000		

**Annual Statement/Performance and Evaluation Report
 Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1:
 Summary**

PHAName: Columbus Housing Authority	Grant Type and Number Capital Fund Program Grant No: NE26P104501-03 Replacement Housing Factor Grant No:	Federal FY of Grant: 2003
-------------------------------------	--	------------------------------

Original Annual Statement Reserve for Disasters/Emergencies Revised Annual Statement (revision no: 02)
 Performance and Evaluation Report for Period Ending: Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
	Amount of line XX Related to Section 504 compliance				
	Amount of line XX Related to Security --Soft Costs				
	Amount of Line XX related to Security --Hard Costs				
	Amount of line XX Related to Energy Conservation Measures				
	Collateralization Expenses or Debt Service				

Annual Statement / Performance and Evaluation Report
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)
Part II: Supporting Pages

PHAName: Columbus Housing Authority		Grant Type and Number Capital Fund Program Grant No: NE26P104501-03? Replacement Housing Factor Grant No:				Federal FY of Grant: 2003		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
NE104	<u>Operations</u>	1406		32,175	5,000			
	<u>Management Improvement</u>	1410		1,000	1,000			
	<u>Fees & costs</u>	1430		500	500			
	<u>Site Improvement</u>	1450						
	• Extend north flood control & drainage			15,000	10,000			
	• Concrete replacement			20,000	10,000			
	• Electric Distribution System			0	39,675			
	<u>Dwelling Structure :</u>	1460			-			
	• HVAC & Upgrade			15,000	20,000			
	• Unit upgrade (flooring, fixtures, smoke detectors, handicap thermostats)			5,000	7,500			
	• Ranges & Refrigerators			6,000	0			
	<u>Dwelling Equipment — Nonexpendable:</u>	1465.1						
	• Ranges & Refrigerators			0	2,500			
	<u>Nondwelling Structures</u>	1470						
	• West laundry			5,000	0			
	• Repairs			0	2,500			
	<u>Nondwelling Equipment</u>	1475						
	• Office Equipment			8,500	4,000			
	• Maintenance equipment			(total)	1,500			
	• Trailer			0	4,000			
	TOTAL			\$108,175	108,175			

Annual Statement/Performance and Evaluation Report
Capital Fund Program and Capital Fund and Program Replacement Housing Factor (CFP/CFPRHF)
Part III: Implementation Schedule

PHAName: Columbus Housing Authority		Grant Type and Number Capital Fund Program No: Replacement Housing Factor No:					Federal FY of Grant: 2003
Development Number Name/HA-Wide Activities	All Funds Obligated (Quarter Ending Date)			All Funds Expended (Quarter Ending Date)			Reasons for Revised Target Dates
	Original	Revised	Actual	Original	Revised	Actual	
NE104	9/30/04	-		9/30/05	-		

SmallPHAPlanUpdate
AnnualPlanforFiscalYear: 2003

COLUMBUSHOUSINGAUTHORITY
ATTACHMENT C
FiveYearActionPlan

Capital Fund Program Five - Year Action Plan

Part I: Summary

PHAName: Columbus Housing Authority						<input type="checkbox"/> Original 5 - Year Plan <input checked="" type="checkbox"/> Revision No: 03			
Development Number/Name/HA-Wide	Year 1 2003	Work Statement for Year 2 FFY Grant: 2004 PHAFY: 10/2005		Work Statement for Year 3 FFY Grant: 2005 PHAFY: 10/2006		Work Statement for Year 4 FFY Grant: 2006 PHAFY: 10/2007		Work Statement for Year 5 FFY Grant: 2007 PHAFY: 10/2008	
NE104	Annual Statement								
		1406 Operations	13,000	1406 Operations	13,000	OPERATIONS	13,000	OPERATIONS	13,000
		1408 Management Improvement	1,000	1408 Management Improvement	1,000	MANAGEMENT IMPROVEMENTS	1,000	MANAGEMENT IMPROVEMENTS	1,000
		1430 Fees and Costs	500	1430 Fees and Costs	500	FEES AND COSTS	500	FEES AND COSTS	500
		1450 Site Improvement	41,175	1450 Site Improvement	10,000	SITE IMPROVEMENT	10,000	SITE IMPROVEMENT	10,000
		1460 Dwelling Structure	35,000	1460 Dwelling Structure	52,175	DWELLING STRUCTURE	58,675	DWELLING STRUCTURE	68,675
		1465.1 Dwelling Equipment	2,500	1465.1 Dwelling Equipment	2,500	1465.1 Dwelling Equipment	2,500	1465.1 Dwelling Equipment	2,500
		1470 Non - Dwelling Structure	8,000	1470 Non - Dwelling Structure	15,000	NON-DWELLING STRUCTURE	7,000	NON-DWELLING STRUCTURE	7,000
		1475 Non - Dwelling Equipment	7,000	1475 Non - Dwelling Equipment	14,000	NON-DWELLING EQUIPMENT	15,500	NON-DWELLING EQUIPMENT	5,500
Total CFP Funds (Est.)		\$108,175.00		\$108,175		\$108,175		\$108,175	
Total Replacement Housing Factor Funds									

**The budgets of 2004 - 2007 consist of \$13,000 in line item 1406 (Operations). As the housing authority begins a substantial renovation of the heating/cooling system (project estimated to last three to four years), there are a number of uncertainties which are related to the age of the buildings and their capacity to sustain the renovation. Therefore, the money in 1406 is designated as an emergency reserve for unforeseen work items. The budgets will be updated annually depending on the progress of the project.

Capital Fund Program Five - Year Action Plan							
Part II: Supporting Pages — Work Activities							
Activities for Year: 2004 FFY Grant: 2004 PHAFY: 10/2005				Activities for Year: 2005 FFY Grant: 2005 PHAFY: 10/2006			
		<u>Original</u>	<u>Revised</u>			<u>Original</u>	<u>Revised</u>
Operations 1406	Total	32,175	13,000	Operations	Total	32,175	13,000
Management Improvement 1408	Total	1,000	1,000	Management Improvements	Total	1,000	1,000
Fees & Costs 1430	Total	500	500	Fees & Costs	Total	500	500
Site Improvement 1450	Total	14,500	41,175	Site Improvement	Total	5,000	10,000
	Concrete work	14,500	7,500		Concrete work	5,000	5,000
	Flood control & drainage	0	7,500		Flood control & drainage		5,000
	Electrical distribution	0	26,175				
Dwelling Structures 1460	Total	37,500	35,000	Dwelling Structures	Total	55,000	52,175
	HVAC & upgrade	15,000	20,000		HVAC & upgrade	15,000	15,000
	Unit upgrades (flooring)	5,000	2,500		Unit upgrades (flooring)	5,000	7,500
	Power wash brick	15,000	5,000		Roofing and windows	35,000	29,675
	Replace windows	2,500	7,500				
Dwelling Equipment 1465.1	Total	0	2,500	Dwelling Equipment	Total	0	2,500
	Range \$ Refrigerators		2,500		Appliances	0	2,500
Non-Dwelling Structure 1470	Total	15,000	8,000	Non-Dwelling Structure	Total	5,000	15,000
	Power wash brick	5,000	0		Roofing	5,000	10,000
	Begin replacing windows	10,000	5,000		Repair		5,000
	Repair	0	3,000				
Non-Dwelling Equipment	Total	7,500	7,000	Non-Dwelling Equipment	Total	9,500	14,000
	Office				Office equipment	2,000	4,000
	Maintenance equipment				Maintenance equipment included		2,000
	Power washer				Washer/Dryer	7,500	8,000
Total Amount of Grant		\$108,175				\$108,175	

**CapitalFundProgramFive -YearActionPlan
PartII:SupportingPages —WorkActivities**

ActivitiesforYear:2006 FFYGrant:2006 PHAFY:10/2007				ActivitiesforYear:2007 FFYGrant:2007 PHAFY10/2008			
		<u>Original</u>	<u>Revised</u>			<u>Original</u>	<u>Revised</u>
Operations	Total	32,175	13,000	Operations	Total	13,000	
ManagementImprovements	Total	1,000	1,000	ManagementImprovements	Total	1,000	
FeesandCosts	Total	500	500	FeesandCosts	Total	500	
SiteImprovement	Total	5,000	10,000	SiteImprovement	Total	10,000	
	Concrete(Cont.)	5,000	5,000		Concrete(Cont.)	5,000	
	Floodcontrol&Drainage	0	2,500		Floodcontrol&Drainage	2,500	
	Landscape&lighting	0	2,500		Landscape&lighting	2,500	
DwellingStructures	Total	60,000	58,675	DwellingStructures	Total	68,675	
	HVAC&upgrade	15,000	17,175		HVAC&upgrade	22,175	
	Unitupgrade(e.g.flooring)	5,000	7,500		Unitupgrade(e.g.,flooring)	7,500	
	Roofingorwindows	40,000	34,000		Roofingorwindows	39,000	
DwellingEquipment	Total	0	2,500	DwellingEquipment	Total	2,500	
	Appliances	0	2,500		Appliances	2,500	
Non-DwellingStructures	Total	7,000	7,000	Non-DwellingStructures	Total	7,000	
	Roofing/shingles	7,000	5,000		HVAC&Upgrade	2,000	
	HVAC&Upgrade	0	2,000		Roofing/Shingles	5,000	
Non-DwellingEquip ment	Total	2,500	15,500	Non-DwellingEquip ment	Total	5,500	
	Officeequipment	5,000	4,000		Officeequipment	4,000	
	Maintenanceequi pment		1,500		Maintenanceequipment	1,500	
	Replaceringmower		10,000				
TotalAnnualGrant		\$108,175		TotalAnnualGrant		\$108,175	
Totalestimatedcostovernext5years		\$540,875					

U.S.DepartmentofHousingandUrbanDevelopment
OfficeofPublicandIndianHousing

SmallPHAPlanUpdate
AnnualPlanforFiscalYear: 2003

**COLUMBUSHOUSINGAUTHORITY
ATTACHMENTS:
D, E,F,G**

**NOTE:THISPHAPLANSTEMPLATE(HUD50075)ISTOBECOMPLETEDI N
ACCORDANCEWITHINSTRUCTIONSLOCATEDINAPPLICABLEPIHNOTICES**

**Required Attachment D:
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: Alyce Cumming

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

Elected

Appointed

C. The term of appointment is (include the date term expires): 12/15/2006

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: November 2004

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

**Required Attachment E:
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.)

Public Housing

Rose Geilenkirchen
Eileen Carnahan
Patricia Callahan

Section 8:

Betty and Randy Elsner

Required Attachment F: Comments of Resident Advisory Board or Boards

The following are issues discussed and comments received from the RAB Board at the May 12, 2003 meeting:

- 1) Results of two residents' survey were presented. Below is the listing of projects by priority to residents, as expressed during two surveys (duplications possible):

Project	Rank - Survey1 (Newsletter)	Rank - Survey2 (Potlock)
Lighting above kitchen sink and pantry	1	1
Concrete replacement	2	4
Handicap (large prints) thermostats in dwelling units	3	2
Build a west laundry facility	4	5
Extend North Flood Control and Drainage	5	3

- 2) On-going projects

RAB approved the projects as prioritized by CHA in its agency plan.

- 3) Comments:

- a. RAB asked that the parking blocks in the area reserved for residents will be removed.

CHA Response: Request will be evaluated.

- b. RAB asked that parking on the grass would be permitted.

CHA Response: Residents may park in the front of the office and walk to the laundry room. Solution accepted by residents.

- c. Public Hearing: Thermostat in one apartment is too high and is hard to reach.

CHA Response: This issue was reported to maintenance and on the following day, addressed to the satisfaction of the residents in meeting standard codes

Required Attachment G :
COMPONENT 10(B) VOLUNTARY CONVERSION OF
DEVELOPMENT(S) FROM PUBLIC HOUSING STOCK:
REQUIRED INITIAL ASSESSMENTS

1. How many of the PHA's developments are subject to the Required Initial Assessment? One
2. How many of the PHA's developments are not subject to the Required Initial Assessments based on exemptions (e.g., elderly, disabled developments not general occupancy projects?) Zero
3. How many Assessments were conducted for the PHA's covered developments? One
4. Identify PHA developments that may be appropriate for conversion based on the Required Initial Assessments.

Development Name	Number of Units
None	0

5. If the PHA has not completed the Required Initial Assessments, describe the status of these assessments .

The Columbus Housing Authority has completed the process of conducting the Required Initial Assessment for Voluntary Conversion of Developments of Public Housing Stock . The Certification of Compliance will be submitted to HUD -Omaha . The following is the conclusion of the Board of Commissioners (July 2002 meetings):

“The Columbus Housing Authority has opted not to convert public housing to section 8”.

2003 Update: The housing authority believes that there have not been significant changes in the market that will justify conversion of public housing to Section 8.