

# **PHA Plans**

## **Streamlined Annual Version**

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

OMB No. 2577-0226  
(exp. 05/31/2006)

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This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937 that introduced 5-year and annual PHA Plans. The full PHA plan provides a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission and strategies for serving the needs of low-income and very low-income families. This form allows eligible PHAs to make a streamlined annual Plan submission to HUD consistent with HUD's efforts to provide regulatory relief for certain types of PHAs. Public reporting burden for this information collection is estimated to average 11.7 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

**Privacy Act Notice.** The United States Department of Housing and Urban Development, Federal Housing Administration, is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Information in PHA plans is publicly available.

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# **Streamlined Annual PHA Plan for Fiscal Year: 2004 (July)**

## **PHA Name: Penns Grove Housing Authority**

**NOTE: This PHA Plan template (HUD-50075-SA) is to be completed in accordance with instructions contained in previous Notices PIH 99-33 (HA), 99-51 (HA), 2000-22 (HA), 2000-36 (HA), 2000-43 (HA), 2001-4 (HA), 2001-26 (HA), 2003-7 (HA), and any related notices HUD may subsequently issue.**

## Streamlined Annual PHA Plan Agency Identification

**PHA Name:** Penns Grove Housing Authority      **PHA Number:** NJ 074

**PHA Fiscal Year Beginning:** (mm/yyyy) July 2004

**PHA Programs Administered:**

**Public Housing and Section 8**     
  **Section 8 Only**     
  **Public Housing Only**  
 Number of public housing units: 151     
 Number of S8 units:     
 Number of public housing units:  
 Number of S8 units: 35

**PHA Consortia: (check box if submitting a joint PHA Plan and complete table)**

Participating PHAs	PHA Code	Program(s) Included in the Consortium	Programs Not in the Consortium	# of Units Each Program
Participating PHA 1:				
Participating PHA 2:				
Participating PHA 3:				

**PHA Plan Contact Information:**

Name: Maria Gransky      Phone: (856) 299-0101  
 TDD: 856-299-0101      Email (if available): pgha-maria@att.net

**Public Access to Information**

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

PHA's main administrative office     
  PHA's development management offices

**Display Locations For PHA Plans and Supporting Documents**

The PHA Plan revised policies or program changes (including attachments) are available for public review and inspection.     
 Yes     
 No.

If yes, 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)

**Streamlined Annual PHA Plan**  
**Fiscal Year 2004**  
[24 CFR Part 903.12(c)]

**Table of Contents**  
[24 CFR 903.7(r)]

Provide a table of contents for the Plan, including applicable additional requirements, and a list of supporting documents available for public inspection.

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**A. PHA PLAN COMPONENTS**

- 1. Site-Based Waiting List Policies  
**903.7(b)(2) Policies on Eligibility, Selection, and Admissions**
- 2. Capital Improvement Needs  
**903.7(g) Statement of Capital Improvements Needed**
- 3. Section 8(y) Homeownership  
**903.7(k)(1)(i) Statement of Homeownership Programs**
- 4. Project-Based Voucher Programs
- 5. PHA Statement of Consistency with Consolidated Plan. Complete only if PHA has changed any policies, programs, or plan components from its last Annual Plan.
- 6. Supporting Documents Available for Review
- 7. Capital Fund Program and Capital Fund Program Replacement Housing Factor, Annual Statement/Performance and Evaluation Report
- 8. Capital Fund Program 5-Year Action Plan
- 9. Attachment: Summary of Policy & Program Changes

**B. SEPARATE HARD COPY SUBMISSIONS TO LOCAL HUD FIELD OFFICE**

**Form HUD-50076, PHA Certifications of Compliance with the PHA Plans and Related Regulations: Board Resolution to Accompany the Streamlined Annual Plan** identifying policies or programs the PHA has revised since submission of its last Annual Plan, and including Civil Rights certifications and assurances the changed policies were presented to the Resident Advisory Board for review and comment, approved by the PHA governing board, and made available for review and inspection at the PHA's principal office;

For PHAs Applying for Formula Capital Fund Program (CFP) Grants:

**Form HUD-50070, Certification for a Drug-Free Workplace:**

**Form HUD-50071, Certification of Payments to Influence Federal Transactions; and  
Form SF-LLL & SF-LLLa, Disclosure of Lobbying Activities.**

**1. Site-Based Waiting Lists (Eligibility, Selection, Admissions Policies)**

[24 CFR Part 903.12(c), 903.7(b)(2)]

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

**A. Site-Based Waiting Lists-Previous Year**

1. Has the PHA operated one or more site-based waiting lists in the previous year? If yes, complete the following table; if not skip to B. **NO**

<b>Site-Based Waiting Lists</b>				
<b>Development Information:</b> (Name, number, location)	<b>Date Initiated</b>	<b>Initial mix of Racial, Ethnic or Disability Demographics</b>	<b>Current mix of Racial, Ethnic or Disability Demographics since Initiation of SBWL</b>	<b>Percent change between initial and current mix of Racial, Ethnic, or Disability demographics</b>

2. What is the number of site based waiting list developments to which families may apply at one time?
3. How many unit offers may an applicant turn down before being removed from the site-based waiting list?
4.  Yes  No: Is the PHA the subject of any pending fair housing complaint by HUD or any court order or settlement agreement? If yes, describe the order, agreement or complaint and describe how use of a site-based waiting list will not violate or be inconsistent with the order, agreement or complaint below:

**B. Site-Based Waiting Lists – Coming Year**

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 next component. **THE PHA DOES NOT PLAN TO OPERATE A SITE-BASED WAITING LIST.**

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)

## **2. Capital Improvement Needs**

[24 CFR Part 903.12 (c), 903.7 (g)]

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

### **A. Capital Fund Program**

1.  Yes  No Does the PHA plan to participate in the Capital Fund Program in the upcoming year? If yes, complete items 7 and 8 of this template (Capital Fund Program tables). If no, skip to B.
2.  Yes  No: Does the PHA propose to use any portion of its CFP funds to repay debt incurred to finance capital improvements? If so, the PHA must identify in its annual and 5-year capital plans the development(s) where such improvements will be made and show both how the proceeds of the financing will be used and the amount of the annual payments required to service the debt. (Note that separate HUD approval is required for such financing activities.).

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

Applicability: 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.

1.  Yes  No: Has the PHA received a HOPE VI revitalization grant? (if no, skip to #3; if yes, provide responses to the items on the chart located on the next page, copying and completing as many times as necessary).
2. Status of HOPE VI revitalization grant(s):

<b>HOPE VI Revitalization Grant Status</b>	
a. Development Name:	
b. Development Number:	
c. Status of Grant:	
<input type="checkbox"/>	Revitalization Plan under development
<input type="checkbox"/>	Revitalization Plan submitted, pending approval
<input type="checkbox"/>	Revitalization Plan approved
<input type="checkbox"/>	Activities pursuant to an approved Revitalization Plan underway

3.  Yes  No: Does the PHA expect to apply for a HOPE VI Revitalization grant in the Plan year?  
If yes, list development name(s) below:
4.  Yes  No: 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:
5.  Yes  No: 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:

**3. Section 8 Tenant Based Assistance--Section 8(y) Homeownership Program**  
(if applicable) [24 CFR Part 903.12(c), 903.7(k)(1)(i)]

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 the next component; if "yes", complete each program description below (copy and complete questions for each program identified.)

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, what is the maximum number of participants this fiscal year?

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:

c. What actions will the PHA undertake to implement the program this year (list)?

### 3. 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 downpayment requirement of at least 3 percent of purchase price and requiring that at least 1 percent of the purchase price 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.
- Partnering with a qualified agency or agencies to administer the program (list name(s) and years of experience below):
- Demonstrating that it has other relevant experience (list experience below):

## **4. Use of the Project-Based Voucher Program**

### **Intent to Use Project-Based Assistance**

Yes  No: Does the PHA plan to "project-base" any tenant-based Section 8 vouchers in the coming year? If the answer is "no," go to the next component. If yes, answer the following questions.

1.  Yes  No: Are there circumstances indicating that the project basing of the units, rather than tenant-basing of the same amount of assistance is an appropriate option? If yes, check which circumstances apply:
  - low utilization rate for vouchers due to lack of suitable rental units
  - access to neighborhoods outside of high poverty areas
  - other (describe below:)
2. Indicate the number of units and general location of units (e.g. eligible census tracts or smaller areas within eligible census tracts):

## **5. PHA Statement of Consistency with the Consolidated Plan**

[24 CFR Part 903.15]

For each applicable Consolidated Plan, make the following statement (copy questions as many times as necessary) only if the PHA has provided a certification listing program or policy changes from its last Annual Plan submission.

1. Consolidated Plan jurisdiction: (provide name here) **Salem County**

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 on its waiting lists 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) **same listed under #3 below**
- Other: (list below)

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

THE AUTHORITY SEEKS TO MINIMIZE THE NUMBER OF PUBLIC HOUSING UNITS OFF-LINE VIA EFFECTIVE MAINTENANCE AND MANAGEMENT POLICY, IN ORDER TO MAXIMIZE AVAILABLE HOUSING OPTIONS.

THE AUTHORITY SEEKS TO REDUCE TURNOVER TIME FOR VACATED UNITS.

THE AUTHORITY SEEKS TO MODERNIZE/RENOVATE EXISTING PUBLIC HOUSING UNITS IN ORDER TO PROVIDE MORE SUITABLE HOUSING OPTIONS.

THE AUTHORITY SEEKS TO CONDUCT OUTREACH EFFORTS TO ENCOURAGE MORE LANDLORDS TO PARTICIPATE IN THE SECTION 8 PROGRAM, THUS PROVIDING INCREASED HOUSING OPTIONS..

## **6. Supporting Documents Available for Review for Streamlined Annual PHA Plans**

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.

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Related Plan Component</b>
	<i>PHA Certifications of Compliance with the PHA Plans and Related Regulations and Board Resolution to Accompany the Standard Annual, Standard Five-Year, and Streamlined Five-Year/Annual Plans;</i>	5 Year and Annual Plans
X	<i>PHA Certifications of Compliance with the PHA Plans and Related Regulations and Board Resolution to Accompany the Streamlined Annual Plan</i>	Streamlined Annual Plans

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Related Plan Component</b>
X	<i>Certification by State or Local Official of PHA Plan Consistency with Consolidated Plan.</i>	5 Year and standard 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 and 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 for families on the PHA's public housing and Section 8 tenant-based waiting lists.	Annual Plan: Housing Needs
X	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources
X	Public Housing Admissions and (Continued) Occupancy Policy (A&O/ACOP), which includes the Tenant Selection and Assignment Plan [TSAP] and the Site-Based Waiting List Procedure.	Annual Plan: Eligibility, Selection, and Admissions Policies
	Deconcentration Income Analysis	Annual Plan: Eligibility, Selection, and Admissions Policies
	Any policy governing occupancy of Police Officers and Over-Income Tenants in Public Housing. <input type="checkbox"/> Check here if included in the public housing A&O Policy.	Annual Plan: Eligibility, Selection, and Admissions Policies
X	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. <input checked="" type="checkbox"/> Check here if included in the public housing A & O Policy.	Annual Plan: Rent Determination
X	Schedule of flat rents offered at each public housing development. <input checked="" type="checkbox"/> Check here if included in the public housing A & O Policy.	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies (if included in plan, not necessary as a supporting document) and written analysis of Section 8 payment standard policies. <input checked="" type="checkbox"/> Check here if included in Section 8 Administrative Plan.	Annual Plan: Rent Determination
X	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation).	Annual Plan: Operations and Maintenance
X	Results of latest Public Housing Assessment System (PHAS) Assessment (or other applicable assessment).	Annual Plan: Management and Operations
	Follow-up Plan to Results of the PHAS Resident Satisfaction Survey (if necessary)	Annual Plan: Operations and Maintenance and Community Service & Self-Sufficiency
X	Results of latest Section 8 Management Assessment System (SEMAP)	Annual Plan: Management and Operations
X	Any policies governing any Section 8 special housing types <input checked="" type="checkbox"/> Check here if included in Section 8 Administrative Plan	Annual Plan: Operations and Maintenance
X	Public housing grievance procedures <input type="checkbox"/> Check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
X	Section 8 informal review and hearing procedures. <input checked="" type="checkbox"/> Check here if included in Section 8 Administrative Plan.	Annual Plan: Grievance Procedures
X	The Capital Fund/Comprehensive Grant Program Annual Statement /Performance and Evaluation Report for any active grant year.	Annual Plan: Capital Needs
	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grants.	Annual Plan: Capital Needs

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Related Plan Component</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
X	Self-evaluation, Needs Assessment and Transition Plan required by regulations implementing Section 504 of the Rehabilitation Act and the Americans with Disabilities Act. See PIH Notice 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
X	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
	Documentation for required Initial Assessment and any additional information required by HUD for Voluntary Conversion.	Annual Plan: Voluntary 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
	Public Housing Community Service Policy/Programs <input type="checkbox"/> Check here if included in Public Housing A & O Policy	Annual Plan: Community Service & Self-Sufficiency
	Cooperative 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
X	Section 3 documentation required by 24 CFR Part 135, Subpart E for public housing.	Annual Plan: Community Service & Self-Sufficiency
	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports for public housing.	Annual Plan: Community Service & Self-Sufficiency
X	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.	Annual Plan: Pet Policy
X	The results of the most recent fiscal year audit of the PHA conducted under the Single Audit Act as implemented by OMB Circular A-133, the results of that audit and the PHA's response to any findings.	Annual Plan: Annual Audit
	Other supporting documents (optional) (list individually; use as many lines as necessary)	(specify as needed)
	Consortium agreement(s) and for Consortium Joint PHA Plans <u>Only</u> : Certification that consortium agreement is in compliance with 24 CFR Part 943 pursuant to an opinion of counsel on file and available for inspection.	Joint Annual PHA Plan for Consortia: Agency Identification and Annual Management and Operations

**ATTACHMENT A: FY 2004 Capital Fund Program Annual Statement / Performance and Evaluation Report and Replacement Housing Factor Progress Report**  
**Part I: Summary**

<b>Annual Statement/Performance and Evaluation Report</b> <b>Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part I: Summary</b>						
<b>PHA Name:</b> Penns Grove Housing Authority		<b>Grant Type and Number</b> Capital Fund Program: NJ 39P074501004 Capital Fund Program Replacement Housing Factor Grant No:			<b>Federal FY of Grant:</b> 2004	
<input checked="" type="checkbox"/> <b>Original Annual Statement</b> (revision no: ) <input type="checkbox"/> <b>Reserve for Disasters/ Emergencies</b> <input type="checkbox"/> <b>Revised Annual Statement</b> <input type="checkbox"/> <b>Performance and Evaluation Report for Period Ending:</b> <input type="checkbox"/> <b>Final Performance and Evaluation Report</b>						
Lin e No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost		
		Original	Revised	Obligated	Expended	
1	Total non-CFP Funds					
2	1406 Operations					
3	1408 Management Improvements Soft Costs					
	Management Improvements Hard Costs					
4	1410 Administration					
5	1411 Audit					
6	1415 liquidated Damages					
7	1430 Fees and Costs	21,800				
8	1440 Site Acquisition					
9	1450 Site Improvement	23,055				
10	1460 Dwelling Structures	161,805				

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

<b>PHA Name:</b> Penns Grove Housing Authority	<b>Grant Type and Number</b> Capital Fund Program: NJ 39P074501004 Capital Fund Program Replacement Housing Factor Grant No:	<b>Federal FY of Grant:</b> 2004
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**Original Annual Statement** (revision no: )  **Reserve for Disasters/ Emergencies**  **Revised Annual Statement**  
 **Performance and Evaluation Report for Period Ending:**  **Final Performance and Evaluation Report**

Lin e No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
11	1465.1 Dwelling Equipment— Nonexpendable				
12	1470 Nondwelling Structures				
13	1475 Nondwelling Equipment	25,000			
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)	231,660			
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	0			

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

<b>PHA Name:</b> Penns Grove Housing Authority		<b>Grant Type and Number</b> Capital Fund Program #: NJ 39P07450104 Capital Fund Program Replacement Housing Factor #:			<b>Federal FY of Grant:</b> 2004			
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Proposed Work
				Original	Revised	Funds Obligated	Funds Expended	
<b>NJ74-2 SILVER RUN</b>	ENTRANCE DOORS	1460		138,075				
<b>NJ74-1 PENN TWS.</b>	UPGRADE NURSE CALL STATION	1460		23,730				
	REPAIR/REPLACE SIDEWALKS	1450		23,055				
	COMMUNITY ROOM FURNITURE	1475		25,000				
<b>PHA-WIDE</b>	A/E SERVICES	1430		21,800				

**Annual Statement/Performance and Evaluation Report FFY 2001**  
**Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)**  
**Part III: Implementation Schedule**

<b>PHA Name:</b> Penns Grove Housing Authority		<b>Grant Type and Number</b> Capital Fund Program #: NJ 39P07450104 Capital Fund Program Replacement Housing Factor #:				<b>Federal FY of Grant:</b> 2004	
Development Number Name/HA-Wide Activities	All Fund Obligated (Quart Ending Date)			All Funds Expended (Quarter Ending Date)			Reasons for Revised Target Dates
	Original	Revised	Actual	Original	Revised	Actual	
NJ74-2 SILVER RUN	6/30/06			6/30/08			
NJ74-1 PENN TOWERS	6/30/06			6/30/08			
PHA-WIDE	6/30/06			6/30/08			

## **ATTACHMENT A FOR FY 2003**

**Progress Report**  
**Part I: Summary**

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

PHA Name: Penns Grove Housing Authority	Grant Type and Number Capital Fund Program: NJ 39P074501-03 Capital Fund Program Replacement Housing Factor Grant No:	Federal FY of Grant: 2003
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Original Annual Statement (revision no: )  Reserve for Disasters/ Emergencies  Revised Annual Statement  
 Performance and Evaluation Report for Period Ending: 12/31/03  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				
3	1408 Management Improvements Soft Costs				
	Management Improvements Hard Costs				
4	1410 Administration				
5	1411 Audit				
6	1415 liquidated Damages				
7	1430 Fees and Costs	21,800	21,800	0	0
8	1440 Site Acquisition				
9	1450 Site Improvement	49,819		0	0
10	1460 Dwelling Structures	121,543	171,362	0	0
11	1465.1 Dwelling Equipment— Nonexpendable				
12	1470 Nondwelling Structures				

<b>Annual Statement/Performance and Evaluation Report</b>					
<b>Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part I: Summary</b>					
<b>PHA Name:</b> Penns Grove Housing Authority		<b>Grant Type and Number</b> Capital Fund Program: NJ 39P074501-03 Capital Fund Program Replacement Housing Factor Grant No:			<b>Federal FY of Grant:</b> 2003
<input type="checkbox"/> <b>Original Annual Statement</b> (revision no: )		<input type="checkbox"/> <b>Reserve for Disasters/ Emergencies</b>			<input type="checkbox"/> <b>Revised Annual Statement</b>
<input checked="" type="checkbox"/> <b>Performance and Evaluation Report for Period Ending: 12/31/03</b>		<input type="checkbox"/> <b>Final Performance and Evaluation Report</b>			
Lin e No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
13	1475 Nondwelling Equipment				
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs				
18	1498 Mod Used for Development				
19	1502 Contingency				
20	Amount of Annual Grant: (sum of lines 2-19)	193,162	193,162		
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				

<b>Annual Statement/Performance and Evaluation Report</b>								
<b>Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)</b>								
<b>Part II: Supporting Pages</b>								
<b>PHA Name:</b> Penns Grove Housing Authority			<b>Grant Type and Number</b> Capital Fund Program #: NJ 39P074501-03 Capital Fund Program Replacement Housing Factor #:			<b>Federal FY of Grant:</b> 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 Proposed Work
				Original	Revised	Funds Obligated	Funds Expended	
<b>NJ74-2 SILVER RUN</b>	A&E SERVICES & CONSTRUCTION MANAGEMENT	1430		21,800	21,800	0	0	
<b>NJ74-1</b>	PAINT APARTMENTS	1460		121,543	121,543	0	0	
<b>NJ74-2</b>	REPARIT/REPLACE DETERIORATED CONCRETE	1450		29,819	--	0	0	
<b>NJ74-2</b>	REPAIR/REPLACE DETERIORATED PARKING LOT	1450		20,000	--	0	0	
<b>NJ74-2</b>	CONTINUE EXTERIOR DOOR REPLACEMENT	1460		--	49,819			

<b>Annual Statement/Performance and Evaluation Report</b> <b>Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)</b> <b>Part II: Supporting Pages</b>								
<b>PHA Name:</b> Penns Grove Housing Authority			<b>Grant Type and Number</b> Capital Fund Program #: NJ 39P074501-03 Capital Fund Program Replacement Housing Factor #:			<b>Federal FY of Grant:</b> 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 Proposed Work
				Original	Revised	Funds Obligated	Funds Expended	
	<b>SUBTOTAL</b>			193,162	193,162	0	0	

**Annual Statement/Performance and Evaluation Report FFY 2001**  
**Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)**  
**Part III: Implementation Schedule**

<b>PHA Name:</b> Penns Grove Housing Authority		<b>Grant Type and Number</b> Capital Fund Program #: NJ 39P074501-03 Capital Fund Program Replacement Housing Factor #:				<b>Federal FY of Grant:</b> 2003	
Development Number Name/HA-Wide Activities	All Fund Obligated (Quart Ending Date)			All Funds Expended (Quarter Ending Date)			Reasons for Revised Target Dates
	Original	Revised	Actual	Original	Revised	Actual	
NJ74-2	9/16/2005			9/16/2007			

**ATTACHMENT A FOR FY 2003**

**Progress Report**  
**Part I: Summary**

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

PHA Name: Penns Grove Housing Authority	Grant Type and Number Capital Fund Program: NJ 39P074502-03 Capital Fund Program Replacement Housing Factor Grant No:	Federal FY of Grant: 2003
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Original Annual Statement (revision no: )  Reserve for Disasters/ Emergencies  Revised Annual Statement  
 Performance and Evaluation Report for Period Ending: 12/31/03  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				
3	1408 Management Improvements Soft Costs				
	Management Improvements Hard Costs				
4	1410 Administration				
5	1411 Audit				
6	1415 liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	38,497.00		0	0
11	1465.1 Dwelling Equipment— Nonexpendable				
12	1470 Nondwelling Structures				

<b>Annual Statement/Performance and Evaluation Report</b>					
<b>Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part I: Summary</b>					
<b>PHA Name:</b> Penns Grove Housing Authority		<b>Grant Type and Number</b> Capital Fund Program: NJ 39P074502-03 Capital Fund Program Replacement Housing Factor Grant No:			<b>Federal FY of Grant:</b> 2003
<input type="checkbox"/> <b>Original Annual Statement</b> (revision no: )		<input type="checkbox"/> <b>Reserve for Disasters/ Emergencies</b>		<input type="checkbox"/> <b>Revised Annual Statement</b>	
<input checked="" type="checkbox"/> <b>Performance and Evaluation Report for Period Ending: 12/31/03</b>		<input type="checkbox"/> <b>Final Performance and Evaluation Report</b>			
Lin e No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
13	1475 Nondwelling Equipment				
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs				
18	1498 Mod Used for Development				
19	1502 Contingency				
20	Amount of Annual Grant: (sum of lines 2-19)	38,497.00		0	0
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**

<b>PHA Name:</b> Penns Grove Housing Authority		<b>Grant Type and Number</b> Capital Fund Program #: NJ 39P074502-03 Capital Fund Program Replacement Housing Factor #:			<b>Federal FY of Grant:</b> 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 Proposed Work
				Original	Revised	Funds Obligated	Funds Expended	
<b>NJ74-1</b>	PAINT APARTMENTS	1460		28,584.32		0	0	
<b>NJ74-2</b>	COMPLETE EXTERIOR ELECTRIC UPGRADE	1460		9,912.68		0	0	
	SUBTOTAL			38,497.00				

**Annual Statement/Performance and Evaluation Report FFY 2001**  
**Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)**  
**Part III: Implementation Schedule**

<b>PHA Name:</b> Penns Grove Housing Authority		<b>Grant Type and Number</b> Capital Fund Program #: NJ 39P074502-03 Capital Fund Program Replacement Housing Factor #:				<b>Federal FY of Grant:</b> 2003	
Development Number Name/HA-Wide Activities	All Fund Obligated (Quart Ending Date)			All Funds Expended (Quarter Ending Date)			Reasons for Revised Target Dates
	Original	Revised	Actual	Original	Revised	Actual	
NJ74-2	9/16/2005			9/16/2007			

**ATTACHMENT A FOR FY 2002**

**Progress Report**  
**Part I: Summary**

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

PHA Name: Penns Grove Housing Authority	Grant Type and Number Capital Fund Program: NJ 39P074501-02 Capital Fund Program Replacement Housing Factor Grant No:	Federal FY of Grant: 2002
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Original Annual Statement (revision no: )  Reserve for Disasters/ Emergencies  Revised Annual Statement  
 Performance and Evaluation Report for Period Ending: 12/31/02  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				
3	1408 Management Improvements Soft Costs				
	Management Improvements Hard Costs				
4	1410 Administration				
5	1411 Audit				
6	1415 liquidated Damages				
7	1430 Fees and Costs	23,429	16,565	16,565	15,045
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	187,636	184,341.50	184,341.50	184,341.50
11	1465.1 Dwelling Equipment— Nonexpendable				
12	1470 Nondwelling Structures	23,700	33,858.50	33,858.50	33,858.50

<b>Annual Statement/Performance and Evaluation Report</b> <b>Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part I: Summary</b>						
<b>PHA Name:</b> Penns Grove Housing Authority		<b>Grant Type and Number</b> Capital Fund Program: NJ 39P074501-02 Capital Fund Program Replacement Housing Factor Grant No:			<b>Federal FY of Grant:</b> 2002	
<input type="checkbox"/> <b>Original Annual Statement</b> (revision no: ) <span style="float: right;"><input type="checkbox"/> <b>Reserve for Disasters/ Emergencies</b> <input type="checkbox"/> <b>Revised Annual Statement</b></span>						
<input checked="" type="checkbox"/> <b>Performance and Evaluation Report for Period Ending: 12/31/02</b> <span style="float: right;"><input type="checkbox"/> <b>Final Performance and Evaluation Report</b></span>						
Lin e No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost		
13	1475 Nondwelling Equipment					
14	1485 Demolition					
15	1490 Replacement Reserve					
16	1492 Moving to Work Demonstration					
17	1495.1 Relocation Costs					
18	1498 Mod Used for Development					
19	1502 Contingency					
20	Amount of Annual Grant: (sum of lines 2-19)	234,765	234,765	234,765	233,245	
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					

<b>Annual Statement/Performance and Evaluation Report</b> <b>Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)</b> <b>Part II: Supporting Pages</b>								
<b>PHA Name:</b> Penns Grove Housing Authority			<b>Grant Type and Number</b> Capital Fund Program #: NJ 39P074501-02 Capital Fund Program Replacement Housing Factor #:			<b>Federal FY of Grant: 2002</b>		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Proposed Work
				Original	Revised	Funds Obligated	Funds Expended	
NJ74-1 PENN TOWER	A& E SERVICES & CONSTRUCTION MANAGEMENT	1430		23,429	16,565	16,565	15,045	
	PAINT APARTMENTS	1460		111,200				
	CONSTRUCT STORAGE SHED	1470		23,700				
	ELECTRICAL OUTLETS	1460		8,000				
	REPLACE WINDOWS IN FIRE STAIRWELLS	1460			15,285	15,285	15,285	
	INSTALL FENCING	1460			9,068.75	9,068.75	9,068.75	
	SECURITY CAMERAS	1470			12,582.50	12,582.50	12,582.50	
	UPGRADE ROOF	1460			14,415	14,415	14,415	
	INSTALL BLINDS	1460			2,333	2,333	2,333	
	SUBTOTAL			166,329	70,249.25	70,249.25	68,729.25	

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<b>Annual Statement/Performance and Evaluation Report</b> <b>Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)</b> <b>Part II: Supporting Pages</b>								
<b>PHA Name:</b> Penns Grove Housing Authority			<b>Grant Type and Number</b> Capital Fund Program #: NJ 39P074501-02 Capital Fund Program Replacement Housing Factor #:			<b>Federal FY of Grant:</b> 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 Proposed Work
				Original	Revised	Funds Obligated	Funds Expended	
NJ74-2 SILVER RUN	EXTERIOR ELECTRIC UPGRADE	1460		68,436				
	REPAIR/REPLACE DETERIORATED CONCRETE	1470			21,276	21,276	21,276	
	REPAIR/REPLACE DETERIORATED CONCRETE	1460			70,676	70,676	70,676	
	REPAIR/REPLACE DETERIORATED PARKING LOT	1460			52,285	52,285	52,285	
	SECURITY CAMERAS	1460			14,764.82	14,764.82	14,764.82	
	SECURITY LIGHTING	1460			5,513.93	5,513.93	5,513.93	
	TOTAL			234,765	234,765	234,765	233,245	

**Annual Statement/Performance and Evaluation Report FFY 2001**  
**Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)**  
**Part III: Implementation Schedule**

<b>PHA Name:</b> Penns Grove Housing Authority		<b>Grant Type and Number</b> Capital Fund Program #: NJ 39P074501-02 Capital Fund Program Replacement Housing Factor #:				<b>Federal FY of Grant:</b> 2002	
Development Number Name/HA-Wide Activities	All Fund Obligated (Quart Ending Date)			All Funds Expended (Quarter Ending Date)			Reasons for Revised Target Dates
	Original	Revised	Actual	Original	Revised	Actual	
NJ74-1	6/6/2004			6/6/2006			

**ATTACHMENT B: FY 2004 Capital Fund Program 5 Year Action Plan**

<b>Capital Fund Program Five-Year Action Plan</b>					
<b>Part I: Summary</b>					
PHA Name PENNS GROVE HOUSING AUTHORITY				<input checked="" type="checkbox"/> <b>Original 5-Year Plan</b> <input type="checkbox"/> <b>Revision No:</b>	
Development Number/Name/HA-Wide	Year 1	Work Statement for Year 2	Work Statement for Year 3	Work Statement for Year 4	Work Statement for Year 5
		FFY Grant: 2005 PHA FY: 2005	FFY Grant: 2006 PHA FY: 2006	FFY Grant: 2007 PHA FY: 2007	FFY Grant: 2008 PHA FY: 2008
NJ74-1 PENN TOWERS	Annual Statement				
		CARPET APARTMENTS	REPLACE COMMUNITY WINDOWS		UPGRADE HEAT SYS
		UPGRADE/RENOVATE		REFRIGERATORS AND RANGES	UPGRADE COMMUNITY ROOM
		FIRE STAIRWELLS	FENCE & ROOF UPGRADE	CARPET HALLWAYS	LANDSCAPING
NJ74-2 SILVER RUN		TRASH ENCLOSURES	REPLACE CLOSET DOORS	REFRIGERATORS AND RANGES	UPGRADE COMMUNITY ROOM
		SIDEWALKS	LANDSCAPING	REPLACE HEATERS	CONCRETE REPAIR/REPLACE

<b>Capital Fund Program Five-Year Action Plan</b>					
<b>Part I: Summary</b>					
PHA Name PENNS GROVE HOUSING AUTHORITY				<input checked="" type="checkbox"/> <b>Original 5-Year Plan</b> <input type="checkbox"/> <b>Revision No:</b>	
Development Number/Name/HA-Wide	Year 1	Work Statement for Year 2	Work Statement for Year 3	Work Statement for Year 4	Work Statement for Year 5
		FFY Grant: 2005 PHA FY: 2005	FFY Grant: 2006 PHA FY: 2006	FFY Grant: 2007 PHA FY: 2007	FFY Grant: 2008 PHA FY: 2008
					LANDSCAPING
PHA WIDE		TRUCK PURCHASE			
		A/E SERVICES	A/E SERVICES	A/E SERVICES	A/E SERVICES
CFP Funds Listed for 5-year planning		231,660	231,660	231,660	231,660
Replacement Housing Factor Funds					

<b>Capital Fund Program Five-Year Action Plan</b>						
<b>Part II: Supporting Pages—Work Activities</b>						
Activities for Year 1	Activities for Year : _2005_ FFY Grant: 2005 PHA FY: 2005			Activities for Year: _2006_ FFY Grant: 2006 PHA FY: 1006		
	<b>Development Name/Number</b>	<b>Major Work Categories</b>	<b>Estimated Cost</b>	<b>Development Name/Number</b>	<b>Major Work Categories</b>	<b>Estimated Cost</b>
<b>See</b>	PENN TWS. NJ 74-1	CARPET APTS.	111,146	PENN TWS. NJ 74-1	REPLACE CMM. RM. WINDOWS	26,500
<b>Annual</b>		UPGRADE/REN OV. FIRE STAIRS	34,784		FENCE AND ROOF UPGRADE	20,500
<b>Statement</b>				SILVER RUN NJ 74-2	REPLACE CLOSET DOORS	117,041
	SILVER RUN NJ 74-2	TRASH ENCLOSURES	14,895		LANDSCAPING	45,819
		SIDEWALKS	9,035		A/E SERVICES	21,800
	PHA-WIDE	A/E SERVICES	21,800			
		TRUCK PURCHASE	40,000			
<b>Total CFP Estimated Cost</b>			<b>\$ 231,660</b>			<b>\$ 231,660</b>

<b>Capital Fund Program Five-Year Action Plan</b>					
<b>Part II: Supporting Pages—Work Activities</b>					
Activities for Year : <u>2007</u> FFY Grant: 2007 PHA FY: 2007			Activities for Year: <u>2008</u> FFY Grant: 2008 PHA FY: 2008		
<b>Development Name/Number</b>	<b>Major Work Categories</b>	<b>Estimated Cost</b>	<b>Development Name/Number</b>	<b>Major Work Categories</b>	<b>Estimated Cost</b>
PENN TOWERS NJ 74-1	CARPET HALLWAYS	25,000	PENN TOWERS NJ 74-1	UPGRADE HEATING SYSTEM	52,000
	REFRIGS. AND RANGES, REPLACE	75,000		UPGRADE COMMUNITY ROOM	25,000
				LANDSCAPING	26,000
SILVER RUN NJ74-2	REFRIGS. AND RANGES, REPLACE	64,146	SILVER RUN NJ 74-2	UPGRADE COMMUNITY ROOM	25,000
	REPLACE HEATERS	45,714		CONCRETE REPAIR/REPLACEMENT	20,000
				LANDSCAPING	46,930
				INSTALL FENCING	14,930
				A/E SERVICES	21,800
PHA-WIDE	A/E SERVICES	21,800			
<b>Total CFP Estimated Cost</b>		<b>\$ 231,660</b>			<b>\$ 231,660</b>

## **ATTACHMENT C: Summary of Policy and Program Changes**

The Housing Authority has amended its Section 8 Administrative Plan to incorporate the following statements:

- The PHA will utilize the INS Systematic Alien Verification for Entitlements (SAVE) system for both primary and secondary verification for Citizenship and Eligible Immigration status.
- The PHA will use the SWICA and TASS Up-Front Verification Technique to Facilitate computer-matching and for up-front verification purposes.
- The PHA will utilize acceptable forms of verification and documentation for Social Security Numbers for all family members age 6 and older.

The Housing Authority has amended its ACOP to incorporate the following statements:

- The PHA will utilize the INS Systematic Alien Verification for Entitlements (SAVE) System for both primary and secondary verification for Citizenship and Eligible Immigration status.
- The PHA will use the SWICA and TASS Up-Front Verification Techniques to facilitate computer-matching and for up-front verification purposes.
- The PHA will utilize acceptable forms of verification and documentation for Social Security Numbers for all family members age 6 and older.
- The PHA will conduct reexamination of incomes at least once every three years for all families paying a flat rent.

The Authority amended its Section 8 Administrative Plan and Continued Occupancy Policy (ACOP) in order to bring same into compliance with the latest HUD regulations regarding provision of support for families and dependents of military personnel who are called to active duty in the Persian Gulf Region.

The Housing Authority has adopted and implemented a written policy to encourage participation in the Section 8 Program by owners of rental units outside areas of poverty and minority concentration. This policy clearly delineates areas of concentration; provides that Voucher holders shall be informed of the full range of areas where they may lease units both inside and outside of the Housing Authority's jurisdiction; and includes actions the Authority will take to encourage owners of properties outside such areas to participate in the Section 8 Program.

The Housing Authority has amended its ACOP and Section 8 Administrative Plan to include the comprehensive policies regarding reasonable accommodations for disabled persons.

## **MEMORANDUM**

### **RE: PENNS GROVE HOUSING AUTHORITY**

The Penns Grove Housing Authority has prepared its Agency Plan in compliance with section 511 of the Quality Housing and Work Responsibility Act of 1998 and ensuing HUD requirements. In accordance with said requirements, the Authority conducted a public hearing in order to invite public discussion on the Agency Plan. The public hearing was held on 3/30/2004, and proper notice was given via publication in Today's Sunbeam, a Salem County newspaper of general circulation, at least 45 days prior to the public hearing date.