

PHA Plans

Streamlined 5-Year/Annual Version

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

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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 to certain 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.

Streamlined 5-Year Plan for Fiscal Years 2005 - 2009

Streamlined Annual Plan for Fiscal Year 2005

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. Full reporting for each component listed in the streamlined Annual Plan submitted with the 5-year plan is required.

Streamlined Five-Year PHA Plan Agency Identification

PHA Name: Luce County Housing Commission

PHA Number: MI132

PHA Fiscal Year Beginning: 01/2005

PHA Programs Administered:

- Public Housing and Section 8**
 Section 8 Only
 Public Housing Only
 Number of public housing units:
 Number of S8 units: 110
 Number of public housing units:
 Number of S8 units:

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:				

Public Access to Information

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

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

Display Locations For PHA Plans and Supporting Documents

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

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

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

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

Streamlined Five-Year PHA Plan PHA FISCAL YEARS 2005 - 2009 [24 CFR Part 903.12]

A. Mission

State the PHA's mission for serving the needs of low-income, very low income, and extremely low-income families in the PHA's jurisdiction. (select one of the choices below)

- The mission of the PHA is the same as that of the Department of Housing and Urban Development: To promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.
- The PHA's mission is: (state mission here)

B. Goals

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

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

- PHA Goal: Expand the supply of assisted housing
Objectives:
- Apply for additional rental vouchers:
 - Reduce public housing vacancies:
 - Leverage private or other public funds to create additional housing opportunities:
 - Acquire or build units or developments
 - Other (list below)
- PHA Goal: Improve the quality of assisted housing
Objectives:
- Improve public housing management: (PHAS score)
 - Improve voucher management: (SEMAP score)
 - Increase customer satisfaction:
 - Concentrate on efforts to improve specific management functions:
(list; e.g., public housing finance; voucher unit inspections)
 - Renovate or modernize public housing units:
 - Demolish or dispose of obsolete public housing:
 - Provide replacement public housing:
 - Provide replacement vouchers:
 - Other: (list below)

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

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

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

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

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

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

- PHA Goal: Ensure equal opportunity and affirmatively further fair housing
Objectives:
- Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability:
 - Undertake affirmative measures to provide a suitable living environment for

families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability:

- Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required:
- Other: (list below)

Other PHA Goals and Objectives: (list below)

Streamlined Annual PHA Plan PHA Fiscal Year 2005

[24 CFR Part 903.12(b)]

Table of Contents

Provide the following table of contents for the streamlined Annual Plan submitted with the Five-Year Plan, including all streamlined plan components, and additional requirements, together with the list of supporting documents available for public inspection.

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B. SEPARATE HARD COPY SUBMISSIONS TO LOCAL HUD FIELD OFFICE

Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations: Board Resolution to Accompany the Standard Annual, Standard Five-Year, and Streamlined Five-Year/Annual Plans;

Certification by State or Local Official of PHA Plan Consistency with Consolidated Plan.

For PHAs APPLYING FOR CAPITAL FUND PROGRAM (CFP) GRANTS:

Form HUD-50070, Certification for a Drug-Free Workplace;

Form HUD-50071, Certification of Payments to Influence Federal Transactions;

Form SF-LLL & SF-LLLa, Disclosure of Lobbying Activities.

Executive Summary (optional)

[903.7(r)]. If desired, provide a brief overview of the contents of the streamlined 5-Year/Annual Plan.

1. Statement of Housing Needs [24 CFR Part 903.12 (b), 903.7(a)]

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

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

Housing Needs of Families on the PHA’s Waiting Lists			
Waiting list type: (select one)			
<input checked="" type="checkbox"/> Section 8 tenant-based assistance			
<input type="checkbox"/> Public Housing			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	27		
Extremely low income <=30% AMI	21	78%	
Very low income (>30% but <=50% AMI)	4	15%	
Low income (>50% but <80% AMI)	2	7%	
Families with children	21	78%	
Elderly families			
Families with Disabilities	4	15%	
Race/ethnicity-White	27	100%	
Race/ethnicity			
Race/ethnicity			
Race/ethnicity			
Characteristics by Bedroom Size (Public Housing Only)			
1BR			
2 BR			
3 BR			
4 BR			
5 BR			
5+ BR			
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			
If yes:			
How long has it been closed (# of months)?			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed?			
<input type="checkbox"/> No <input type="checkbox"/> Yes			

B. Strategy for Addressing Needs

Provide a brief description of the PHA's strategy for addressing the housing needs of families on the PHA's public housing and Section 8 waiting lists **IN THE UPCOMING YEAR**, and the Agency's reasons for choosing this strategy.

Increase awareness about self-sufficiency programs offered in the area for low-income, elderly and /or disabled and let them know that they have the right to safe, decent, affordable housing.

(1) Strategies

Need: Shortage of affordable housing for all eligible populations

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

Select all that apply

- Employ effective maintenance and management policies to minimize the number of public housing units off-line
- Reduce turnover time for vacated public housing units
- Reduce time to renovate public housing units
- Seek replacement of public housing units lost to the inventory through mixed finance development
- Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources
- Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required
- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies
- Other (list below)

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

Select all that apply

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

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

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

Select all that apply

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

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

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

Select all that apply

- Employ admissions preferences aimed at families who are working
- Adopt rent policies to support and encourage work
- Other: (list below)

Need: Specific Family Types: The Elderly

Strategy 1: Target available assistance to the elderly:

Select all that apply

- Seek designation of public housing for the elderly
- Apply for special-purpose vouchers targeted to the elderly, should they become available
- Other: (list below)

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

Select all that apply

- Seek designation of public housing for families with disabilities
- Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing
- Apply for special-purpose vouchers targeted to families with disabilities, should they become available
- Affirmatively market to local non-profit agencies that assist families with disabilities
- Other: (list below)

Need: Specific Family Types: Races or ethnicities with disproportionate housing needs

Strategy 1: Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:

Select if applicable

- Affirmatively market to races/ethnicities shown to have disproportionate housing needs
- Other: (list below)

Strategy 2: Conduct activities to affirmatively further fair housing

Select all that apply

- Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- Market the section 8 program to owners outside of areas of poverty /minority concentrations
- Other: (list below)

Other Housing Needs & Strategies: (list needs and strategies below)

(2) Reasons for Selecting Strategies

Of the factors listed below, select all that influenced the PHA's selection of the strategies it will pursue:

- Funding constraints
- Staffing constraints
- Limited availability of sites for assisted housing
- Extent to which particular housing needs are met by other organizations in the community
- Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA
- Influence of the housing market on PHA programs
- Community priorities regarding housing assistance
- Results of consultation with local or state government
- Results of consultation with residents and the Resident Advisory Board
- Results of consultation with advocacy groups
- Other: (list below)

2. Statement of Financial Resources

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

List on the following table the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant based Section 8 assistance programs administered by the PHA during the Plan year. Note: the table assumes that Federal public housing or tenant based Section 8 assistance grant funds are expended on eligible purposes; therefore, uses of these funds need not be stated. For other funds, indicate the use for those funds as one of the following categories: public housing operations, public housing capital improvements, public housing safety/security, public housing supportive services, Section 8 tenant-based assistance, Section 8 supportive services or other.

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2005 grants)		
a) Public Housing Operating Fund		
b) Public Housing Capital Fund		
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	\$361,337	
f) Resident Opportunity and Self-Sufficiency Grants		
g) Community Development Block Grant		
h) HOME		
Other Federal Grants (list below)		
2. Prior Year Federal Grants (unobligated funds only) (list below)		
3. Public Housing Dwelling Rental Income		
4. Other income (list below)		
4. Non-federal sources (list below)		
Total resources	\$361,337	

3. PHA Policies Governing Eligibility, Selection, and Admissions

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

A. Public Housing

Exemptions: PHAs that do not administer public housing are not required to complete subcomponent 3A.

(1) Eligibility

a. When does the PHA verify eligibility for admission to public housing? (select all that apply)

- When families are within a certain number of being offered a unit: (state number)
- When families are within a certain time of being offered a unit: (state time)
- Other: (describe)

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

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

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

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

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

(2)Waiting List Organization

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

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

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

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

c. 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 d.

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

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:

d. 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 subsection (3) **Assignment**

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

2. Yes No: Are any or all of the PHA’s site-based waiting lists new for the upcoming year (that is, they are not part of a previously-HUD-approved site based waiting list plan)?
 If yes, how many lists?

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

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

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

(3) Assignment

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

- One
- Two
- Three or More

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

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

(4) Admissions Preferences

a. Income targeting:

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

b. Transfer policies:

In what circumstances will transfers take precedence over new admissions? (list below)

- Emergencies
- Over-housed
- Under-housed
- Medical justification
- Administrative reasons determined by the PHA (e.g., to permit modernization work)
- Resident choice: (state circumstances below)
- Other: (list below)

c. Preferences

1. Yes No: Has the PHA established preferences for admission to public housing (other than date and time of application)? (If "no" is selected, skip to subsection **(5) Occupancy**)

2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences:

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden (rent is > 50 percent of income)

Other preferences: (select below)

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

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

- Date and Time

Former Federal preferences:

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

Other preferences (select all that apply)

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

4. Relationship of preferences to income targeting requirements:

- The PHA applies preferences within income tiers
- Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

(5) Occupancy

a. What reference materials can applicants and residents use to obtain information about the rules of occupancy of public housing (select all that apply)

- The PHA-resident lease
- The PHA's Admissions and (Continued) Occupancy policy
- PHA briefing seminars or written materials
- Other source (list)

b. How often must residents notify the PHA of changes in family composition? (select all that apply)

- At an annual reexamination and lease renewal
- Any time family composition changes
- At family request for revision
- Other (list)

(6) Deconcentration and Income Mixing

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 on the following table:

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)]

B. Section 8

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

(1) Eligibility

a. What is the extent of screening conducted by the PHA? (select all that apply)

- Criminal or drug-related activity only to the extent required by law or regulation
- Criminal and drug-related activity, more extensively than required by law or regulation
- More general screening than criminal and drug-related activity (list factors):
- Other (list below)

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

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

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

e. Indicate what kinds of information you share with prospective landlords? (select all that apply)

- Criminal or drug-related activity
- Other (describe below)

(2) Waiting List Organization

a. With which of the following program waiting lists is the section 8 tenant-based assistance waiting list merged? (select all that apply)

- None
- Federal public housing
- Federal moderate rehabilitation
- Federal project-based certificate program
- Other federal or local program (list below)

b. Where may interested persons apply for admission to section 8 tenant-based assistance? (select all that apply)

- PHA main administrative office
- Other (list below)

(3) Search Time

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

If yes, state circumstances below: We allow extensions in order to keep the Voucher Program leased and running to its maximum potential.

(4) Admissions Preferences

a. Income targeting

Yes No: Does the PHA plan to exceed the federal targeting requirements by targeting more than 75% of all new admissions to the section 8 program to families at or below 30% of median area income?

b. Preferences

1. Yes No: Has the PHA established preferences for admission to section 8 tenant-based assistance? (other than date and time of application) (if no, skip to subcomponent **(5) Special purpose section 8 assistance programs**)

2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- Victims of domestic violence
- Substandard housing
- Homelessness
- High rent burden (rent is > 50 percent of income)

Other preferences (select all that apply)

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

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

1 Date and Time

Former Federal preferences:

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

Other preferences (select all that apply)

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

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

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

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

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

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

- The PHA applies preferences within income tiers
- Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

(5) Special Purpose Section 8 Assistance Programs

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

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

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

- Through published notices
- Other (list below)

4. PHA Rent Determination Policies

[24 CFR Part 903.12(b), 903.7(d)]

A. Public Housing

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

(1) Income Based Rent Policies

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

a. Use of discretionary policies: (select one of the following two)

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

b. Minimum Rent

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

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

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

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

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

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

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

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

- For the earned income of a previously unemployed household member
 For increases in earned income
 Fixed amount (other than general rent-setting policy)
If yes, state amount/s and circumstances below:

Fixed percentage (other than general rent-setting policy)

If yes, state percentage/s and circumstances below:

- For household heads
- For other family members
- For transportation expenses
- For the non-reimbursed medical expenses of non-disabled or non-elderly families
- Other (describe below)

e. Ceiling rents

1. Do you have ceiling rents? (rents set at a level lower than 30% of adjusted income) (select one)

- Yes for all developments
- Yes but only for some developments
- No

2. For which kinds of developments are ceiling rents in place? (select all that apply)

- For all developments
- For all general occupancy developments (not elderly or disabled or elderly only)
- For specified general occupancy developments
- For certain parts of developments; e.g., the high-rise portion
- For certain size units; e.g., larger bedroom sizes
- Other (list below)

3. Select the space or spaces that best describe how you arrive at ceiling rents (select all that apply)

- Market comparability study
- Fair market rents (FMR)
- 95th percentile rents
- 75 percent of operating costs
- 100 percent of operating costs for general occupancy (family) developments
- Operating costs plus debt service
- The "rental value" of the unit
- Other (list below)

f. Rent re-determinations:

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

- Never

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

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

(2) Flat Rents

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

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

B. Section 8 Tenant-Based Assistance

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

(1) Payment Standards

Describe the voucher payment standards and policies.

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

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

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

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

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

- FMRs are not adequate to ensure success among assisted families in the PHA's segment of the FMR area

- Reflects market or submarket
- To increase housing options for families
- Other (list below)

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

- Annually
- Other (list below)

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

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

(2) Minimum Rent

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

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

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

5. Capital Improvement Needs

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

Exemptions from Component 5: Section 8 only PHAs are not required to complete this component and may skip to Component 6.

A. Capital Fund Activities

Exemptions from sub-component 5A: PHAs that will not participate in the Capital Fund Program may skip to component 5B. All other PHAs must complete 5A as instructed.

(1) Capital Fund Program

- a. Yes No Does the PHA plan to participate in the Capital Fund Program in the upcoming year? If yes, complete items 12 and 13 of this template (Capital Fund Program tables). If no, skip to B.
- b. 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 of sub-component 5B: 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) Hope VI Revitalization

- a. Yes No: Has the PHA received a HOPE VI revitalization grant? (if no, skip to next component; if yes, provide responses to questions on chart below for each grant, copying and completing as many times as necessary)
- b. Status of HOPE VI revitalization grant (complete one set of questions for each grant)
Development name:
Development (project) number:
Status of grant: (select the statement that best describes the current status)
 Revitalization Plan under development
 Revitalization Plan submitted, pending approval
 Revitalization Plan approved
 Activities pursuant to an approved Revitalization Plan underway
- c. Yes No: Does the PHA plan to apply for a HOPE VI Revitalization grant in the Plan year? If yes, list development name/s below:
- d. 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:
- e. 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:

6. Demolition and Disposition

[24 CFR Part 903.12(b), 903.7 (h)]

Applicability of component 6: Section 8 only PHAs are not required to complete this section.

- a. Yes No: Does the PHA plan to conduct any demolition or disposition activities (pursuant to section 18 or 24 (Hope VI) of the U.S. Housing Act of 1937 (42 U.S.C. 1437p) or Section 202/Section 33 (Mandatory Conversion) in the plan Fiscal Year? (If "No", skip to component 7; if "yes", complete

one activity description for each development on the following chart.)

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

7. Section 8 Tenant Based Assistance--Section 8(y) Homeownership Program

[24 CFR Part 903.12(b), 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 below:

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):

- a. 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.
- b. 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.
- c. Partnering with a qualified agency or agencies to administer the program (list name(s) and years of experience below).
- d. Demonstrating that it has other relevant experience (list experience below).

8. Civil Rights Certifications

[24 CFR Part 903.12 (b), 903.7 (o)]

Civil rights certifications are included in the *PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations: Board Resolution to Accompany the Standard Annual, Standard Five-Year, and Streamlined Five-Year/Annual Plans*, which is submitted to the Field Office in hard copy—see Table of Contents.

9. Additional Information

[24 CFR Part 903.12 (b), 903.7 (r)]

A. PHA Progress in Meeting the Mission and Goals Described in the 5-Year Plan

(Provide a statement of the PHA's progress against the goals and objectives established in the previous 5-Year Plan for the period FY 2004 -2008.

We have strived and maintained the use of all Vouchers each month ensuring that we help all that we are allowed. We have increased our housing supply in the area to promote income mixing by spreading work of our program to prospective landlords and maintaining good working relations with both landlord and tenant.

B. Criteria for Substantial Deviations 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: Discretionary changes in the policies or plans of the PHA that fundamentally change the mission, goals objectives, or plans of the agency that require formal approval by the Board of Commissioners.

b. Significant Amendment or Modification to the Annual Plan: Discretionary changes in the policies or plans of the PHA that fundamentally change the mission, goals objectives, or plans of the agency that require formal approval by the Board of Commissioners.

C. Other Information

[24 CFR Part 903.13, 903.15]

(1) Resident Advisory Board Recommendations

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

If yes, provide the comments below:

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

Considered comments, but determined that no changes to the PHA Plan were necessary.

The PHA changed portions of the PHA Plan in response to comments
List changes below:

Other: (list below)

(2) Resident Membership on PHA Governing Board

The governing board of each PHA is required to have at least one member who is directly assisted by the PHA, unless the PHA meets certain exemption criteria. Regulations governing the resident board member are found at 24 CFR Part 964, Subpart E.

a. Does the PHA governing board include at least one member who is directly assisted by the PHA this year?

Yes No:

If yes, complete the following:

Name of Resident Member of the PHA Governing Board: Mary Lou Fossitt

Method of Selection:

Appointment

The term of appointment is (include the date term expires): 12/2008

Election by Residents (if checked, complete next section--Description of Resident

Election Process)

Description of Resident Election Process

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

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

Eligible candidates: (select one)

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

Eligible voters: (select all that apply)

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

b. 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):

Date of next term expiration of a governing board member: 12/2006

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

(3) 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).

Consolidated Plan jurisdiction: Luce County

a. 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 list 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)
- Other: (list below)

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

To promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.

(4) (Reserved)

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

10. Project-Based Voucher Program

a. Yes No: Does the PHA plan to “project-base” any tenant-based Section 8 vouchers in the coming year? If yes, answer the following questions.

b. 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:)

c. Indicate the number of units and general location of units (e.g. eligible census tracts or smaller areas within eligible census tracts):

11. List of Supporting Documents Available for Review for Streamlined Five-Year/ 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.

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Related Plan Component
X	<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>	Standard 5 Year and Annual Plans; streamlined 5 Year Plans
X	State/Local Government Certification of Consistency with the Consolidated Plan.	5 Year 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
	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources
	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
	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
	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 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
	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
	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

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Related Plan Component
	Consortium agreement(s).	Annual Plan: Agency Identification and Operations/ Management
	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
	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
	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
	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
	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
	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
	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
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
	Consortium agreement(s), if a consortium administers PHA programs.	Joint PHA Plan for Consortia
	Consortia Joint PHA Plans ONLY: 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 PHA Plan for Consortia
	Other supporting documents (optional). List individually.	(Specify as needed)

12. Capital Fund Program and Capital Fund Program Replacement Housing Factor Annual Statement/Performance and Evaluation Report

Annual Statement/Performance and Evaluation Report					
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part I: Summary					
PHA Name:		Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No:			Federal FY of Grant:
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/ Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	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				
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				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Nondwelling Structures				
13	1475 Nondwelling Equipment				
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs				
18	1499 Development Activities				
19	1501 Collateralization or Debt Service				
20	1502 Contingency				
21	Amount of Annual Grant: (sum of lines 2 – 20)				
22	Amount of line 21 Related to LBP Activities				
23	Amount of line 21 Related to Section 504 compliance				
24	Amount of line 21 Related to Security – Soft Costs				
25	Amount of Line 21 Related to Security – Hard Costs				
26	Amount of line 21 Related to Energy Conservation Measures				

13. Capital Fund Program Five-Year Action Plan

Capital Fund Program Five-Year Action Plan					
Part I: Summary					
PHA Name				<input type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revision No:	
Development Number/Name/HA-Wide	Year 1	Work Statement for Year 2 FFY Grant: PHA FY:	Work Statement for Year 3 FFY Grant: PHA FY:	Work Statement for Year 4 FFY Grant: PHA FY:	Work Statement for Year 5 FFY Grant: PHA FY:
	Annual Statement				
CFP Funds Listed for 5-year planning					
Replacement Housing Factor Funds					

13. Capital Fund Program Five-Year Action Plan

Capital Fund Program Five-Year Action Plan						
Part II: Supporting Pages—Work Activities						
Activities for Year 1	Activities for Year : ____ FFY Grant: PHA FY:			Activities for Year: ____ FFY Grant: PHA FY:		
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
See						
Annual						
Statement						
Total CFP Estimated Cost			\$			\$

LUCE COUNTY HOUSING COMMISSION
ADMINISTRATIVE PLAN

I. Statement Of Overall and Objectives in Administrating the Section 8 Housing Program

The present administrative staff of the Luce County Housing Commission consists of an Executive Director and Administrative Secretary.

Our overall goal and objective of the Section 8 Programs is to provide housing assistance for families in locating existing housing that is suitable and within their income ranges and needs.

II. Plans for the Administration of Program Functions

A. Outreach to families and contact with owners:

In the event the initial outreach procedures as outlined in the Equal Opportunity Housing Plan is not consistent with outreach goals, advertisement in the local media will be increased along with increased personal contact with eligible families and landlords.

In the event it becomes apparent that it may be possible to process applications and leases more rapidly than anticipated, a request to revise the leasing schedule will be submitted to the proper authority. Should the application procedure be too slow, the same procedure as outlined in the paragraph above will be followed.

Contacts to inform and encourage Real Estate people, etc. will be undertaken as outlined in the Equal Opportunity Housing Plan.

B. Completion of application, determination of eligibility and selection of families:

Applications from prospective clients will be received at the office of the Luce County Housing Commission, 550 West Victory, Newberry, Michigan 49868. Should the number of applications received indicate there are sufficient units available to house prospective tenants into the next year, the application process will be temporarily suspended until such time as units are available. Prospective participants will be advised of the suspension of the application process at the time the applicant applies for a Voucher through posting of notices in the local media and other conspicuous areas in the community.

C. Eligibility:

To be eligible to participate on the rental program, an applicant must meet the following criteria:

- The household's annual income may not exceed the applicable income limits
- All family members six years or older must provide a Social Security Number or certify they don't have one.
- Applicants must furnish evidence of citizenship or eligible immigrant status.

The Luce County Housing Commission may not discriminate against any family based on the following: race, color, religion, sex, disability, familial status and national origin.

HUD establishes the income limits at admission according to family size for the area in which we are located. (Very-low limit: 50% of area median / Low limit: 80% of area median). The family's gross income is compared to the income limits. An eligible applicant must be a family/individual whose annual income does not exceed the applicable income limit as set by HUD.

Applicants on the waiting list who have an increase in income above the limits may not be admitted. Transfers from other housing authorities must be treated as new admissions. Once a

family is admitted (leased) it is no longer subject to initial income limits in order to retain eligibility.

D. Waiting List:

All persons who express a desire to participate in the rental assistance program must be given an opportunity to apply whenever the waiting list is open. The Luce County Housing Commission is responsible for receiving and processing applications in a way, which treats all applicants fairly, and consistently. The Housing Commission will use only one waiting list for the Section Voucher Program. Applications are taken on an ongoing basis, Monday through Friday from 8AM to 4PM at 550 West Victory, Newberry, Michigan 49868. Applications may be received in person or by mail. Ineligible families will be informed in writing of the reasons for their ineligibility and will, upon request, receive an informal hearing with the appropriate staff member of the commission.

The waiting list will include the following: family name, family voucher size, date and time of application received. Families are selected in order and receive the appropriate subsidy for the family size.

E. Preferences

The Luce County Housing Commission has chosen to offer local preferences to applicants who are otherwise eligible, and who, at the time they are seeking housing assistance, qualify for the preference. The list of preferences is:

Involuntary Displaced	200 pts
Substandard Housing	200 pts
Paying more than 50% of income for rent	200 pts
Age 62 years of age or older (PM)	50 pts
Resident of Luce County (PM)	50 pts
Nearly elderly (age 50 of age or older) (PM)	50 pts
Disabled	25 pts
Veteran	25 pts

F. Removal from the Waiting List

Failure to respond to requests for information or updates, or refusal of assistance under the Voucher Program constitutes removal from waiting list, keeping in mind, the rights of the disabled persons. Applications removed from the waiting list will be documented.

G. Closing the Waiting List

Based on available funding conditions, the waiting list can be stopped. A public notice will be published in our local newspaper when this occurs.

H. Opening the Waiting List

A public notice will be published in our local newspaper in accordance with our administrative plan and HUD's requirements. The notice will provide information on where and when families may apply for the program.

I. Briefing of families and issuance of Vouchers:

Prospective tenants will be briefed at individual sessions whenever possible and advised of all aspects of the program. Program literature will also be issued to interested families.

The staff will explain to each family that it has the right to choose any standard housing in Luce County. The family will be advised if they choose a unit renting below the Fair Market Rent, that they will realize a savings. If they choose a unit renting above the Fair Market Rent, they will have to pay the additional amount, if they have a Voucher.

Staff personnel will contact prospective clients who have been issued Vouchers but have been

able to find suitable units will remind them that they have sixty (60) days to locate a unit before their Voucher expires and also determine if the client is encountering difficulty in locating a suitable unit. The staff will also advise all families who claim discrimination of their rights to file a complaint under Title VIII of the Civil Rights Acts of 1968 and if local assistance in filing a complaint is not available, refer the client to the Detroit HUD office.

Vouchers will be extended to the same family in excess of sixty (60) days providing the family has met the following conditions:

1. The family has attended briefing sessions and requested an extension of time.
2. The degree to which a family has made an effort to locate housing.
3. The family has had extenuating circumstances such as family emergencies, hospitalization, etc., which impeded their search for housing.

I. Briefing of Landlords and Agents:

Prospective landlords and/or agents will be briefed at individual sessions whenever possible and be advised of all aspects of the programs. Landlord briefing packets will also be issued to interested landlords and agents.

1. Definitions of Household/Family Type

A. Family

A family consists of 1) one or more persons who have a family type relationship (i.e. - related by blood, marriage, operation of law, or as otherwise determined by the Commission.

B. Elderly Family

A family whose head, spouse or sole member is at least 62 years of age.
Two or more persons at least persons at least 62 years of age living together
One or more persons at least 62 years of age living with one or more live-in aides.

C. Disabled Family

A family whose head, spouse or sole member is a person with disabilities.
Two or more persons with disabilities living together.
One or more persons with disabilities living with one or more live-in aides.

D. Displaced Family

A family in which each member or sole member is a person displaced by governmental action,
A family displaced by a disaster recognized by the Federal government, which extensively damaged or destroyed their dwelling.

E. Single Persons

All single persons are eligible if they meet other eligibility criteria. A single person may be:

- An elderly person (62 or over)
- A displaced person
- A disabled person
- Any other single person, who is not elderly, displaced disabled or the remaining member of a tenant family.

If a single person is pregnant there is no allowance for the unborn child, the income limits for one-person family is used and third party verification is obtained (physician's certificate).

F. Families with Disabilities

Receipt of Social Securities Disability or Supplemental Security Income is verification of disability. If such benefits are not received, the following can provide a basis for verification:

- Letters regarding qualification for SSI payments
- Proof of residence in an institution
- Documents showing hospitalization for a disability
- Letter from another knowledgeable professional, such as a health or service professional or a social worker.

G. Live-In Aide

A live-in aide is a person approved by the Housing Commission who resides in the unit to care for a family member who is disabled or at least 50 years of age, and who:

- Is determined to be essential to the care and well being of the person(s)
- Is not obligated for support of the person(s), and
- Who would not be living in the unit except to provide necessary supportive services.

The Housing Commission may refuse to approve a particular person as a live-in aide if the person:

- Commits fraud, bribery or any other corrupt or criminal act in connection with any federal housing program
- Commits drug-related criminal activity or violent criminal activity
- Currently owes rent or other amounts to the Housing Commission or to another housing commission with Section 8 or public housing assistance Under the 1937 Act.

Foster Children and Adults

Families may have foster children or foster adults living with them if it would not result in overcrowding. Foster children are counted for subsidy standards but do not qualify for the \$480 dependent allowance. Foster children do not qualify for deductions for child care.

Child Custody

If a child does not currently reside with the applicant, the Housing Commission should consider the child part of the part of the family only if there is evidence that the child would reside with the applicant if the applicant were issued a Voucher. More than one applicant should not claim the same child. If the child is included as part of the family, typical determinations on income and allowances are to be made.

Remaining Member

The remaining member of a Section 8 assisted tenant family is a family member who remains in the unit when other members of the family no longer reside in the unit and are removed from the lease.

2. Section 8 Program

The Housing Community and Development Act of 1974 authorized the Section 8 Existing Housing Programs.

The Existing Housing Program now refers to the Voucher Program. The Voucher Program was authorized by congress in 1984 as a demonstration program and received permanent authorization in 1987. Under the Section 8 Existing Program rent the Housing Commission makes subsidy payments to the owners on behalf of the family.

See Chart Next Page

Over-FMR

Subsidy maximum

is the payment standard which is FMR or HUD approved area exception rent.

Voucher

Subsidy maximum

is the payment standard (which can be set by the HA between 80-100% of the FMR exception rent limit.

Total Tenant Payment

is calculated by a formula. There is no maximum

Total Tenant Payment

is calculated by a formula. There is no maximum.

Gross Rent

is not capped by the FMR. Rent may exceed the payment standard, if family is willing to pay the difference. The HA must approve the family share by taking into account the family's in other expenses, such as child care, unreimbursed medical, and other appropriate family expenses.

Gross Rent

is not capped by the FMR. Rent may exceed the the payment standard if the family is willing to pay the difference.

Exceptions

are not applicable because gross rent can exceed the FMR.

Exceptions

are not applicable because gross rent cannot exceed the FMR.

No Rent Increases

by owner during the first year. After that, lease governs rent increases, although the HA must approve the rent. Tenant must pay any Housing Commission approved rent increases over the applicable payment or move to another unit.

No Rent Increases

by the owner during the first year. After that, lease governs rent increases, although the HA must approve the rent increases over the applicable payment standard or move to another unit.

Payment Standard

is set by HUD and equals 100% of the FMR/exception rent.

Payment Standard

is set by the HA and can be any amount between 80-100% of the FMR/exception rent.

3. Eligibility Factors

To be eligible for participation, an applicant must meet the following eligibility factors:

- The household's annual income may not exceed the applicable income limit
- All family members six years or older must provide a Social Security Number or certify they don't have one.
- Applicant must furnish evidence of citizenship or eligible immigrant status

4. Minimum Rents

Minimum rents shall not be less than \$25.00 per month. Residents have a right to claim an exemption from paying the minimum rent provided they prove one of the following hardships exemptions:

- The family has lost eligibility for is awaiting an eligibility determination for Federal, State or local assistance program, including a family that includes a member who is an alien lawfully admitted for permanent residence under the Immigration and Nationality Act who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (the Welfare Reform Act).
- The family would be evicted as a result of the imposition of the minimum rent requirement
- The income of the family has decreased because of changed circumstance, including loss of employment
- A death in the immediate family has occurred
- The Luce County Housing Commission may determine other situations as

If resident requests a hardship exemption and the Housing Commission reasonably determine the hardship to be of a temporary nature, the exemption shall not be granted for 90 days. The resident cannot be evicted during this 90-day period for non-payment of rent. If the resident later demonstrates that the hardship is long-term, the Housing Commission shall retroactively exempt the resident from the minimum rent for the initial 90-day period.

All changes must be reported within ten (10) days of the change. Verification and documentation shall be required for annual and/or interim re-exams. Residents who fail to report changes in income or family composition to the Housing Commission or failure to furnish documentation for re-exams in a timely manner shall be served a thirty-day notice to quit. A resident who claims eligibility as a disabled person but who is not receiving social security benefits, must furnish proof annually of continuing disability. Doctor's examinations and/or professional case conferences or other means may be used to determine eligibility for continued occupancy.

5. Payment Standards

Payment Standards Schedules are established by bedroom size. The current payment standard adopted on 11-01-02 is as follows:

1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom
\$353	\$446	\$580	\$661

6. Occupancy Ranges

Standards used to issue Vouchers are as follows:

<u>Certificate Size</u>	<u>Minimum No. of Persons In Household</u>	<u>Maximum No. of Persons In Household</u>
0-Bedroom	1	1
1-Bedroom	1	2
2-Bedroom	2	4
3-Bedroom	4	6
4-Bedroom	6	8

5-Bedroom	8	10
6-Bedroom	10	12

Standards used to determine acceptability of unit. Note: HQS allows 2 persons per living/sleeping room and would permit the following maximum occupancy assuming a living room is used as a living/sleeping area.

0-Bedroom	1
1-Bedroom	4
2-Bedroom	6
3-Bedroom	8
4-Bedroom	10
5-Bedroom	12
6-Bedroom	14

7. Annual Income

Annual Income is the GROSS amount of income anticipated to be received by all adult members of the household during the 12 months following certification or recertification.

Annual income includes:

- Gross amount of wages and salaries, overtime pay, commissions, fees, tips, bonuses and other compensation for personal services, including salaries from income of full-time students 18 years of age and older is counted. Earned income of children under 18 years of age is not counted, but benefits and unearned income is counted. All income paid to or on behalf of foster children is not counted. Net income from operation of a business or profession, net income equals gross income less expenses, interest, dividends and other income from net family assets. Interest portion of the monthly payments received by the applicant on deeds of trust or mortgages. All regular pay, special pay and allowance, except hazardous duty pay, paid to members of the armed forces who is a family member and is the spouse or head of household, whether or not living in the dwelling, or is 18 or over and has dependents living in the unit. If the net family assets are more than \$5,000.00 the actual income from assets or the imputed income is used. Imputed income from assets is obtained by taking the passbook rate, (HUD establishes a passbook rate for this purpose) the current rate to be used is 2.0%.

*Alimony and child support awarded as part of a divorce or separation agreement is counted as income unless the applicant certifies the income is not being provided and has made reasonable efforts to collect the amount due, including filing with courts or agencies responsible for enforcing payments.

The minimum family contribution is 10% of the family's gross adjusted monthly income.

The actual amount of subsidy the family will receive will not be determined until the gross rent for the unit is known. It will be the lesser of:

- Payment standard minus 30% of adjusted income
- Gross rent minus 10% of unadjusted income

8. Assets

The current amounts held in savings accounts and the average balance for the last 6 months in checking accounts are to be used in valuing assets. The following are counted as assets: stocks, bonds, savings certificates, money market funds, other investment accounts, equity in property, capital investments, cash value of trusts, IRA's, retirement savings accounts (deducting any penalties for withdrawal), contributions to company retirement/pension fund, assets which although owned by more than one person allow unrestricted access by the applicant. Other assets would include: lump-sum receipts, cash value of life insurance policies and assets disposed of for

less than fair market value during the two years preceding examination or reexamination.

For assets disposed of count the difference between the market value and actual payment received. Family assets do not include: personal property, interest in Indian Trust lands, assets not accessible by the family and assets that are a part of an active business or farming operation.

9. Child Care

Reasonable child care expenses for the care of children age 12 and younger may be deducted from annual income if all the following are true:

- Care is necessary to enable a family member to work, further his/her education, or actively seek employment
- An agency or individual outside the household does not reimburse the expense
- The expense incurred to enable a family member to work does not exceed the amount earned.

Written verification from the person who receives the payments will be required. The verification will specify the hours and days during which the care is provided, the names of the children, the frequency and amount of compensation received.

10. Verifications

All factors affecting eligibility and the family's payment must be verified. All verifications will be documented in the applicant's file. The methods of verification are: third party verification (written or oral), review of documents and family certification.

Third party verification will either be mailed to the appropriate contact or oral verification will be used with the appropriate form. Employment verification will ask for regular and overtime hours worked, current pay, anticipated pay rate increases, hourly rate or salary, YTD earnings, overtime pay for the past 12 months and total pay anticipated for the past 12 months.

Social Security and Supplemental Security Income will be verified with third party verification. Applicants, if possible, will supply the Commission with documentation of current benefits.

If third party verification is not possible, or time is of the essence, review the original documents before a final determination is made.

Family certification (notarized statement) should be used only when third-party verification or review of documents is not possible.

11. Leasing

When a family finds a suitable unit, it must submit to the Luce County Housing a completed Request of Lease Approval (HUD-52517A) signed by both participant and landlord. Applicants may submit more than one request at a time. The Commission may provide the owner information about the applicant's history of family members, or drug trafficking by family members. The Housing Commission will give the same type of information to all families and their owners.

The Housing Commission must review the Request for Lease Approval, reviewed the proposed lease, check that there are not conflicts of interest, schedule an HQS inspection for the unit and promptly notify the family and owner whether the assisted tenancy is approved. The Housing Commission may not approve the lease until the following program requirements are met:

- Unit is eligible
- Unit inspected and passed HQS
- Lease is approvable and includes lease addendum
- Rent to owner is reasonable
- For the regular tenancy program, contract rent plus utility allowances does not exceed FMR/exception rent limit

Actions before lease term: the unit passes inspection, landlord and tenant have executed lease and Housing Commission approved leasing of the unit according to program guidelines.

Persons signing housing contracts as head of household and spouse/co-head must be at least 18 years of age or emancipated. Persons under 18 years of age will be required to obtain a release statement from the Probate Court (if you are under 17 years old) or District Court (for 17 year old).

Families and owners are not required to use a model lease but are encouraged to use it, incorporating the language of the lease addendum, or permit owners to submit their own form if they agree to use the Addendum to the Lease. If the owner's lease contains provisions that are in direct conflict with the Lease Addendum, the Housing Commission will point out the provisions to the landlord and explain that the Addendum language prevails.

The lease must specify what utilities and appliances are owner-supplied and what are to be supplied by the family.

Initial terms of the lease must be for at least one year. Termination of leases can after one year, be initiated by both owner and/or tenant. The Housing Commission can terminate the HAP Contract or terminate assistance to the family.

If the family chooses to terminate the lease, they must give not more than 60 calendar days notice of termination to the owner. A copy of that notice must be given to the owner at the same time.

Any new lease or lease revision must be approved by the Housing Commission and requires that the Housing Commission enter into a new HAP contract. The owner may offer the family a new lease, after approval by the Housing Commission for a term beginning at any time after the first year of the term of the lease. The owner has to give the tenant written notice of the offer with a copy to the Housing Commission at least 60 days before the proposed beginning date of the new lease term. The offer must specify a reasonable time limit for the family to accept.

12. Portability

Portability allows a family to move from one PHA jurisdiction to another with continued assistance. Statutory portability allows Voucher holders to move to any jurisdiction within the State and anywhere within an MSA. Regulatory portability applies to Vouchers only and involves moves outside of statutory portability areas. This will provide an opportunity to a Voucher holder or participate to move to another jurisdiction by requiring the PHA in that jurisdiction to accept the family. This also promotes moves of Voucher holders by encouraging PHA's to participate on a voluntary basis (Regulatory Portability).

Usually there are two parties involved, an initial PHA and a receiving PHA. The initial PHA is the PHA that issues the Voucher. The initial PHA may limit the number of Voucher holders that use Regulatory portability to 15% of the Voucher under lease in the initial PHA's program. The initial PHA may not limit the number of Vouchers who participate in statutory portability. The initial PHA will also inform the receiving PHA of the deadline by which the family must submit a Request for Lease Approval.

If the receiving PHA elects to administer the or Voucher, the initial PHA will reimburse the receiving PHA for the full amount of housing assistance payments and 80% of the initial PHA's ongoing administrative fee for each unit month that the family is receiving housing assistance in the receiving PHA's jurisdiction. The receiving PHA does not have to accept regulatory vouchers unless it has a housing voucher program. If a Regulatory Voucher holder wants to move into an area and the PHA does not have a voucher program they may refer the initial PHA to a statewide or other multi-jurisdictional PHA that administers a housing voucher program in its area.

Administer the housing voucher and bill the initial PHA as if they had a housing voucher program.

The family must be under the Initial PHA's income limit and not under the Receiving PHA's income limit. The family will be under the Payment Standard for the Receiving PHA used in the voucher program. Families may move more than once under the portability procedures. However, the Initial PHA will limit moves to once in any 12-month period. Nationwide Regulatory portability is limited to Vouchers only. In order to use this portability the family must live in the jurisdiction of the Initial PHA and hold the voucher. This portability is limited to 15% of the units under lease under our voucher program. The rest of the regulatory portability rules will be used.

13. Security Deposit Requirement

Families are responsible for paying the security deposit and any required utility deposits.

The security deposit the owner may collect from the family may not be in excess of:

- Private market practice, or
- Amounts charged by owner to unassisted tenants.

When a tenant moves out, the owner, subject to State or local law, may use the security deposit, including interest on the deposit, as reimbursement for any:

- Damages to the unit, or
- Other amounts the tenant owes under the lease

The owner must give the tenant a written list of all items and amounts charged against the security deposit. After deducting the reimbursement to owner, the owner must promptly refund the unused balance of the security deposit to the tenant. If the security deposit is not sufficient to cover amounts the family owes under the lease, the owner may seek to collect the balance from the tenant.

Landlords are not required to collect security deposits; however, if deposit is collected, the PHA's liability for claims for unpaid rent and tenant damage will be reduced by the amount the owner could have collected.

14. Lease Approval/Contracts Execution

Contract rent reasonableness will be determined by relationship to rents currently being charged for comparable units in the private unassisted market taking into account location, size, type, quality, management and maintenance service of such units.

The program will be explained to owners who have signed requests for lease approval or who have been approached by a Voucher holder the major program provisions, Lease Approval, Housing Quality Inspections, contract provisions and payment procedures. Copies of the pertinent forms will be furnished.

15. Contract Execution

The HAP contract (HAP-52641) will be used between the Housing Commission and the owner. The term of the lease begins on the first day of the term of the lease and ends on the last day of the term of the lease. The HAP contract terminates if the lease terminates. The HAP contract states the amount of the Contract Rent and defines the Housing Commission and owner responsibilities under the program. When the lease approval process is completed, the Housing Commission notifies the landlord and family of the lease approval or disapproval. The Housing Commission will use its best efforts to execute the HAP contract before the beginning of lease term.

16. Payments to Owner

Housing assistance payments are paid to owners for units leased by eligible families in accordance with the Contract. The assistance payments will cover the difference between the contract rent and the tenant rent. When applicable, the utility reimbursement will be paid to the utility companies (as designated by families) as an additional housing assistance payment. All payments will be made on the first day of the month.

17. Annual and Interim Recertification

Families should be notified in writing 120 days in advance of the scheduled effective date, so that the reexamination can be completed in time to give the family reasonable notice of any rent increase.

Head of household, spouse (regardless of age) and each additional adult living in the household must sign a Form HUD-9886, *Authorization for Release of Information/Privacy Act Notice*, at the time of initial, interim, or annual reexamination.

The Housing Commission will obtain and document, in the tenant file, third party verification or why third party verification was not available:

- Reported family annual income
- The value of assets
- Expenses related to deductions from annual income
- Other factors that affect the determination of adjusted income

The Housing Commission should compare the information the family reports to the family's most recent reexamination to identify any discrepancies and ask the family to explain them. Annual reexaminations should be implemented as of the scheduled date, even if other annual activities are not complete. The effective date of reexamination is the effective date of the redetermined housing assistance payment for the over-FMR and Voucher programs, and the effective date of the redetermined TTP for the Regular Tenancy Program. Families and owners must be notified in writing of the results of the reexamination and effective date of the change. The Housing Commission should give family's reasonable notice of any rent increase (usually 30 days prior to the first of the month). Families who fail to cooperate with the Housing Commission in providing the necessary information may be terminated from the Section 8 Program.

Procedures to be followed for families eligible for continued assistance are:

- Re-exam income and family composition
- An annual unit inspection is conducted
- The owner's rent is reviewed for rent reasonableness and comparability
- The family and owner are notified of changes in Subsidy and Tenant Rent

Assistance under the Contract is automatically continued if the family is eligible, unless the Housing Assistance Payment Contract is terminated, the lease is terminated, or a new lease is offered.

Families who intend to move are usually briefed and issued a new Voucher and applicable briefing package.

- A new lease and Contract are prepared and executed if a family moves.

The owner may offer the tenant a new lease at any time after the first term. The owner must give the tenant written notice of the offer of a new lease at least 60 days before the proposed beginning date of the new lease term.

Interim Re-examination Policy

At any time, the Housing Commission may conduct an interim reexamination of family income and composition. Anytime, the family may request an interim determination of family income or composition due to any changes that may have occurred since the last determination (the Housing Commission must make the interim determination within a reasonable time after the family request). Interim examinations are conducted in accordance with the policies in the administrative plan. Families that fail to comply with re-examination requirements will be terminated from rental assistance. Verification procedures are the same as those used for annual recertifications except the policy may specify that only the changes need to be verified.

18. Termination and Family Moves

Families will be advised at their initial briefing and execution of dwelling lease of their contractual obligation to provide a 30-day notice prior to vacating a unit. This clause will also be inserted in all leases. Any deviation from the practice will be at the discretion of the owner.

An owner's request for an eviction must be in writing and will be reviewed and responded to within 20 days of receipt of it. Failure to respond to an owner's request for an eviction will be the same as authorizing eviction. The Housing Commission will adhere to the following:

- Examine the grounds for eviction
- Determine whether proper notice has been provided
- Review the family's obligation to the eviction, if requested to do so, in writing or in person with 10 days
- Notify the owner and family of its decision after 10 days, but within 20 days, of the notice of eviction to the family

Families will not be issued a new Voucher if any of the following conditions prevail:

- There is an unpaid rental balance due the owner and arrangements for payment of some have not been agreed upon or found acceptable
- There are unpaid damages due to the owner for destruction of property, etc. verified by PHA
- The severity of other pertinent lease violations

Vacancy claims for payment for loss of rents, damages or vacancy leases will be reviewed and acted upon in accordance with the regulations. Documentation as to whether or not a family gave proper notice to vacate a unit should be available to the Housing Commission and is the responsibility of the family to provide a written notice of the families intention to vacate and should be documented in the tenant file.

19. Housing Quality Standards (HQS)

The purpose of the Section 8 Voucher Program is to assist the lower income families in obtaining a safe and sanitary place to live. Inspection form HUD-52580-A will be used to determine that each unit approved for leasing meets the HQS. Units will be inspected prior to leasing and at least annually thereafter.

20. Lease Approval and Housing Assistance Payments Contracts Execution

Contract rent reasonableness will be determined by relationship to rents currently being charged for comparable units in the private unassisted market taking into account location, size, type, quality, management and maintenance service of such units.

The program will be explained to owners who have signed requests for lease approval or who have been approached by a Voucher holder the major program provisions, Lease Approval, Housing Quality Inspections, contract provisions and payment procedures. Copies of the pertinent forms will be furnished.

21. **Terminations**

During the term of the lease, the owner may terminate, the tenant may terminate or the Housing Commission may terminate the lease.

Termination by Owner

Termination by owner may be on the following grounds:

- Serious or repeated violations of the terms and conditions of the lease
- Violations of Federal, state or local law that directly relate to the occupancy or use of the unit or premises
- Other good cause

Nonpayment by the Housing Commission is not grounds for termination of the lease, since the family is not responsible for the portion under the HAP contract.

The following types of criminal activity by the tenant, any member of the household, guest, or another person under the tenant's control shall be cause for termination of tenancy:

- Any criminal activity that threatens the safety or the right to peaceful enjoyment of premises by other residents.
- Any criminal activity that threatens the health, safety, or right of peaceful enjoyment of their residences by persons residing in the immediate vicinity of the premises, or
- Any drug-related criminal activity on or near the premises.

During the term of the lease, the owner may only evict the tenant from the unit by instituting court action. Terminations of tenancy for other good cause include:

- Not accepting an offer of a new lease or revision.
- A family history of disturbance to neighbors, destruction of property, or living or housekeeping habits which result in damage to the unit or premises.
- The owner desires to use the unit for personal or family use, or for a purpose other than a residential rental unit.
- A business or economic reason such as sale of the property, renovation, or the request for a rent higher than the Housing Commission can approve.

At the end of the lease term, the owner may terminate the lease without cause or may extend the term of the lease. The owner must give the tenant written notice of grounds for termination of tenancy. The notice must be given at or before commencement of the eviction action and the notice may be included or combined with any owner eviction notice under State law to the family. The owner's eviction notice is a notice to vacate, or a complaint or pleading used under State or local law to start an eviction action. The owner must give the Housing Commission a copy of any owner eviction notice given to the family.

Termination by Family

The family may terminate tenancy after the first year of the lease. Terminations during the first year are allowed only if the owner agrees to release the family from the lease. The family must give the owner and the Housing Commission notice of termination in accordance with the lease prior to moving from the unit. (The owner's lease may not require more than 60 calendar days notice).

HAP Contract Termination

The HAP Contract is a contract between the Housing Commission and the owner. When the family reaches zero HAP, the HAP contract ends automatically 180 calendar days after the last housing assistance payment to the owner. When the owner terminates the lease in accordance with the terms of the lease, housing assistance payments are terminated. If the owner has started eviction proceedings, and the family continues to live in the unit, the Housing Commission must

continue to pay the owner until a court judgment or other process allows the owner to evict the tenant. The Housing Commission may terminate HAP contract because the Consolidated ACC is insufficient to support continued assistance for families in the program.

Other reasons the HAP contract may be terminated would be:

- Violations of space standards
- Subsidy too big for family size (regular tenancy only)
- Owner breach of contract

Termination of Family Assistance

Due to a family's action or failure to act, the Housing Commission may terminate assistance to participants by:

- Refusing to enter into a HAP contract
- Refusing to approve a lease
- Terminating the HAP contract
- Refusing to process or provide assistance under portability procedures

The Housing Commission may terminate assistance to a family for reasons including:

- Family violates any family obligation
- Any member of the family has ever been evicted from public housing
- If the Housing Commission has ever terminated assistance under the Voucher Program for any member of the family
- If any family member commits drug-related criminal activity, or violent criminal activity
- If the Housing Commission determines that any family member is illegally using a controlled substance
- If the Housing Commission determines that any family member's abuse of alcohol interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents
- If any family member commits fraud, bribery or another corrupt or criminal act regarding any federal housing program
- If the family currently owes rent or other amounts to the Housing Commissioner to another housing commission with Section 8 or public housing program.

When deciding to terminate, the Housing Commission has discretion of considering circumstances regarding the family's action or failure to act, including the seriousness of the case and the effects on family members who were not involved in the action or failure to act. The Housing Commission may permit continued assistance for the family if the family member(s) who were involved in the act will not reside in the unit. The Housing Commission must terminate assistance if any member of the family fails to sign and submit consent forms for obtaining continuing eligibility factor verifications. The family must submit evidence of citizenship or eligible immigration status and the Housing Commission must deny or terminate based on the noncitizen rule regulations and applicable informal hearing procedures.

The Housing Commission must give the family a written description of family obligations and grounds on which the Housing Commission may deny or terminate assistance because of family action or failure to act.

A family may be absent from the unit for brief periods of time; however, the family may not be absent from the unit for a period of more than 180 consecutive calendar days for any reason. Housing assistance payments, HAP contract and assisted lease terminate if the family is absent for longer than 180 days maximum. The owner may reimburse the Housing Commission for any HAP paid to cover the time after termination. The Housing Commission may set up a verification process to verify family occupancy or absence, including: letters to the family's unit, phone calls, home visits and questions to landlord or neighbors.

The Housing Commission may terminate assistance to a family if any member commits drug-related criminal activity or violent criminal activity. The Housing Commission may terminate if the preponderance of evidence indicates that a family member has engaged in criminal activity, regardless if the family member has been arrested or convicted. (Note: a person does not have to have been arrested or convicted in order to terminate for this reason). A family with a member who has been convicted of drug-related criminal activities may be able to show that the family member has been rehabilitated. The Housing Commission must consider all of the circumstances in each case, including the seriousness of the offense, the extent of participation by family members, and the effects that denial or termination would have on family members not involved in the proscribed activity. The Housing Commission, in appropriate cases, permit family members not involved in the proscribed activities to continue receiving assistance on the condition that family members determined to have engaged in the proscribed activities will not reside in the unit.

22. Complaints and Appeals

The Housing Commission must provide program participants with the opportunity for an informal hearing to consider whether certain housing commission decisions are in accordance with the law, HUD regulations and housing commission policies. An opportunity for a hearing is required for the following:

- Determination of annual or adjusted income to compute HAP
- Determination of appropriate utility allowance for tenant-paid utilities from the Housing Commission utilities allowance schedule
- Determination of family size under the Housing Commission subsidy standards
- Determination to terminate assistance for participant family because of family's action or failure to act
- Determination to terminate assistance because the family has been absent from the assisted unit for longer than HUD rules or the Housing Commission allow

Informal hearing are not required when the Housing Commission takes other action following Housing Commission discretionary determinations or:

- For general policy issues/class grievances
- For establishment of Housing Commission utility allowance schedules
- When the Housing Commission refuses to extend or suspend a voucher
- When the Housing Commission decides not to approve a unit or a lease
- When a unit fails for HQS violations (except for termination of assistance for family-caused HQS fails)
- When the Housing Commission determines that a unit is not in accordance with HQS because of family size
- When the Housing Commission determines to exercise or not exercise any right or remedy against the owner under a HAP contract

The Housing Commission must notify the family that the family may ask for an explanation of the basis of the Housing Commission's determination of:

- The family's annual or adjusted income and its use to compute the HAP
- Appropriate utility allowance (if any) for tenant-paid utilities from the Housing Commission schedule

If the family does not agree with the Housing Commission's determination, the family may request an informal hearing on the decision. The notice must contain a brief statement of the reasons for the decision, state that if the family does not agree with the decision the family may request an informal hearing and state the deadline for requesting a hearing.

When a hearing is required and is requested by the family, the Housing Commission must proceed with the hearing in a reasonably expeditious manner. The hearing will be conducted by a staff member in response to written complaints by families and owners. Families or owners may request legal advisors to be present at all hearings and to examine evidence presented at hearings, which was pertinent in reaching a decision.

23. Cost Allocation Policy

All costs connected with the Supplement and Voucher Programs will be prorated as follows:

Director 100% Supplement

Secretary 36% Supplement/64% Voucher

Custodian 36% Supplement/64% Voucher

At year-end, expenses are analyzed and appropriate accounts are charged and/or credited by our fee accountants.

24. Operating Reserve Threshold

The programs operating reserve shall be used to pay Section 8 Administrative cost that exceed earned administrative fees for the commission's fiscal year. The Commission shall ensure that projected administrative fees and the operating reserve will cover all projected costs of efficient and effective program administrative through the remaining annual contributions contract terms. Operating reserve funds may be expended for other housing purposes consistent with the Commissions authority under State and Local law, provided that the amounts used for other housing purposes are not required for projected administrative expenses through remaining ACC terms. If the commission anticipates ongoing fees will not be sufficient for ongoing administrative costs through its ACC terms, an appropriate amount shall be retained in the operating reserve for projected administrative costs. Expenditures from the operating reserve for other housing purposes may not exceed \$1,000 of the operating reserve without prior approval of the board of commissioners. Where expenditures exceed this threshold, the board, as part of its approval, shall make affirmative determination that the expenditures are necessary and reasonable for other housing purposes consistent with the commission's authority under state and local law.

25. Pet Policy

Pets will be allowed and shall be governed by the Pet Policy of the Luce County Housing Commission. A pet deposit of \$100.00 shall be charged to any resident who chooses to have a pet. The Voucher Program's lease includes the option for the landlord to select whether or not the tenant(s) are allowed pets in the rental unit.

LUCE COUNTY HOUSING COMMISSION
SECTION 8 RENTAL ASSISTANCE PROGRAM (S)
PARTICIPANT/APPLICANT GRIEVANCE PROCEDURE

Right to the Grievance Procedure

Any participant receiving rental assistance under the Section 8 Rental Program(s), or any applicant to such program(s), shall have the right to request a hearing under the grievance procedure.

Grievant

The grievant is any participant receiving rental assistance under the Section 8 program(s), or any applicant to the program(s), who files a timely written GRIEVANCE alleging that the Housing Commission actions or failure to act in accordance with established laws, regulations, policies and procedures has adversely affected the participant/applicant's status.

Grievance

The grievance is a written notice signed by the Grievant alleging that the Commission's action or failure to act has adversely affected the Grievant. THE GRIEVANCE MUST:

Be presented in writing to the Administrative Office of the Luce County Housing Commission at 550 West Victory within ten (10) working days of the alleged Commission's actions or failure to act, which caused the grievance. It must specify the cause for the grievance and what action the grievant wants the Commission to take to provide relief.

The Executive Director may waive the timely filing requirement, or other details of the filing process so that the grievance and access to the process are preserved.

Procedure

Informal Grievance Hearing:

Within five (5) working days of a grievance being filed the Hearing Officer shall fix a date for the Hearing. At the Grievant's expense, legal counsel may present them. Within five (5) working days of the Grievance Hearing, the Hearing Officer shall give a written answer to the grievance.

The answer shall specify:

1. The disposition of the grievance and the reason(s) therefore;
2. The right of the Grievant to a Formal Hearing;
3. The procedure by which a Formal Hearing may be obtained.

The decision of the Hearing Officer shall be binding upon both the Grievant and the Executive Director, and the director shall take all action necessary to carry out the decision; unless the Executive Director, within ten (10) working days from the date of the hearing, files a written request with the Housing Commission requesting that the Housing Commissioners review the decision of the Hearing Officer at their next regular meeting or a special meeting for such purposes.

Formal Grievance Hearing:

If the Grievant is dissatisfied with the answer (of the Hearing Officer), they may submit a written request to the Executive Director for a Formal Grievance Hearing. This request must be submitted within (10) working days of the Informal Grievance Hearing answer.

If the Grievant does not request a hearing within the time period allowed, the Grievant's right to a hearing is waived and the grievance answer become final. However, this does not mean the Grievant's right to other legal remedies has been waived.

The Formal Grievance Hearing will be scheduled as early as possible before a Hearing Panel consisting of the Housing Commission members. No member who may have a conflict of interest regarding the grievance at issue may serve on the panel for that particular hearing.

The hearing shall be private unless the Grievant requests, and the Hearing Panel agree to, a public hearing. This does not mean that persons with a valid and appropriate interest be barred from the proceedings. At the Grievant's expense legal counsel may represent him.

If the grievant FAILS TO APPEAR AT THE HEARING, the Hearing Panel may postpone the hearing for five (5) working days, or declare that the Grievant has waived his/her right to the hearing.

The hearing shall be informal. Oral and documentary evidence presented by the Grievant and Executive Director supporting their position in the dispute must be relevant to the issues raised in the Informal Grievance Hearing and answer.

Within three (3) working days of the Formal Grievance Hearing, the Hearing Panel shall render its decision in a written report, which shall outline its findings of fact and conclusions in support of its decision. The decision shall be final and binding under this grievance procedure.

The Hearing Panel will consider all of the circumstances in each case, including the seriousness of the offense. The extent of participation by family members and the effects that denial or termination would have on family members not involved in the proscribed activity. In appropriate cases the Hearing Panel may permit family members not involved in the proscribed activities to continue receiving assistance on the condition that family member to have engaged in the proscribed activities will not reside in the unit.

If the Hearing Panel's decision favors the Grievant, the Executive Director shall take steps necessary to remedy the situation as soon as possible. However, if the Hearing Panel determines that the Hearing Officer acted arbitrarily or exceeded its authority, it may continue with further factual hearing.

A person does not have to have been arrested or convicted, but there must be a preponderance of evidence to terminate assistance or deny participation for the following:

<u>OFFENSE</u>	<u>TERM</u>
Violation of Family Responsibilities	1 year
Drug Use, or Drug Possession	1 1/2 years
Program Abuse	2 years
Engage in any Drug Related Criminal Activity	3 years
Criminal Activity Involving Crimes of Physical Violence	3 years
Fraud	4 years

Waiver of Rights Prohibited

The Grievant's use of this Participation/Applicant Grievant Procedure, in whole or in part, shall not constitute a waiver by the Grievant to any other available legal proceedings and remedies.

**DECONCENTRATION POLICY
LUCE COUNTY HOUSING COMMISSION**

The Luce County Housing Board of Commissioners will adopt the following plan for the following purpose:

To meet the requirements of the Quality Housing and Work Responsibility Act of 1998 in eliminating the concentration of poverty and admitting applicants of mixed incomes in our public housing units.

The Luce County Housing Commission has a Section 8 Voucher Program consisting of 110 Vouchers throughout Luce County, the current income guidelines for the Luce County Housing Commission are:

30% of Median	\$10,250 (1 Person)	\$11,750 (2 People)	\$13,200 (3 People)
Very Low Income	\$17,100 (1 Person)	\$19,550 (2 People)	\$22,000 (3 People)
Low Income	\$27,400 (1 Person)	\$31,300 (2 People)	\$35,200 (3 People)

30% of Median	\$14,650 (4 People)	\$15,850 (5 People)	\$17,000 (6 People)
Very Low Income	\$24,450 (4 People)	\$26,400 (5 People)	\$28,350 (6 People)
Low Income	\$39,100 (4 People)	\$42,250 (5 People)	\$45,400 (6 People)

(refer to attachment for households larger than 6)

RESIDENT/WAITING LIST STATISTIC: As of September 1, 2004 the income mix of current residents is:

Our current waiting list consist of 27 applicants with:

- 78% being below 30% the median income
- 15% being very low income
- 7% being low income

DECONCENTRATION PLAN: The Luce County Housing Commission will make every effort to follow the guidelines of new admissions, with every effort made to meet the requirements of 40% of new admissions each fiscal year falling below the 30% of the median income range. One or more of the current applicants may be excluded from consideration for an apartment should their income fall within the guidelines with meeting the Quality and Work Responsibility Act requirements.

We will continue to encourage all eligible applicants to apply, continuing to admit applicants based on availability, as our main objective must be fill all vacancies to maintain financial stability. (This policy adopted on July 19, 1999.)

AFFIRMATIVE ACTION POLICY

The purpose of the Affirmative Action Policy is to insure that there will be no discrimination because of race, color, creed, sex, handicap, religion, political affiliation or national origin in the hiring practices of staff.

Designation of Affirmative Action Officer:

Erin A. Teske is the designated Affirmative Action Officer for the Luce County Housing Commission and will have the responsibility to implement and maintain the Affirmative Action Policy.

The specific duties shall include, but are not limited to:

1. Insure information concerning Affirmative Action Policy is posted.
2. Insure that there is no discrimination in hiring practices due to race, color, creed, age, religion, sex, handicap, political affiliation or national origin.
3. Implement a system for receiving and investigating complaints of discrimination.
4. Inform and train staff as to their responsibilities in the equal employment opportunity program.

Dissemination of Affirmative Action Policy:

The Affirmative Action Policy is posted in the lobby of Parkview Manor next to the Executive Director's office and the staff has been made aware of it and allowed to review this plan.

Recruiting and Selection:

When advertising for an open position within the Housing Commission, it will state that we are an "Equal Opportunity Employer".

Applicants are informed that they may appeal within two (2) weeks should they feel they have been discriminated against while applying for a job with the commission.

The procedure for a present staff member filing complaints will be handled in the same procedure as for an applicant.

DRUG-FREE WORKPLACE POLICY STATEMENT

It is the policy of the Luce County Housing Commission to maintain a drug-free workplace and to support federal and state laws which prohibit the manufacture, distribution, dispensing, possession or use of controlled substances in the workplace by employees of the Housing Commission or participants under various programs such as CWEP or JTPA.

Any employee or program participant found to be in violation of these laws and of the Housing Commission policy will be subject to disciplinary procedures, or mandatory rehabilitation programs and/or may be subject to immediate discharge.

Any employee or program participant in need of drug counseling, rehabilitation or other employee assistance related to drug abuse should first contact the substance abuse center at Helen Newberry Joy Hospital.

The Luce County Housing Commission must then notify the Regional Office of the U.S. Department of Housing & Urban Development or other appropriate governmental agency within ten (10) days. The Housing Commission will then take appropriate disciplinary personnel action against the employee or program participant within thirty (30) days of receiving notice from the employee or program participant, including termination of employment, or shall require the employee or program participant to participate satisfactorily in a drug abuse assistance or rehabilitation program.

If you wish to learn more about the harmful and dangerous impact of drug abuse in the workplace, an informational brochure is available from Helen Newberry Joy Hospital.

This Policy was developed in conformance with Notice PIH 89-18 from the U. S. Department of Housing & Urban Development and 24 CFR Part 630, the interim final rule published January 31, 1989 in the Federal Register Volume 54, No. 19, Pages 4951, 2, effective March 18, 1989.

EQUAL OPPORTUNITY HOUSING PLAN

A. COMMUNITY-WIDE EFFORTS

Luce County's local media consists of a weekly newspaper The Newberry News and a radio station (WNBY). The Housing Commission will publish a notice to lower income families, each week, in The Newberry News and daily on WNBY, until they receive enough qualified applicants for the program and an adequate waiting list to fill vacancies as they occur. The advertising will also encourage participation by owners in the program. The Housing Commission will institute advertising, as needed, to replenish the waiting list, as vacancies are filled. The establishment of a waiting list for Vouchers will be as prescribed by the Regulations. Outreach to encourage participation by owners and others will also be in conformance with the Regulations. All advertisement will include prominent use of the Equal Housing Opportunity Logo, Slogan or Statement and will conform to HUD's proposed Advertising Guidelines for Fair Housing.

The County's federal legislator's office has had a press release on the local radio station. The Housing Commission will send a press release to The Newberry News and to the local radio station announcing the program and inviting applicants and rental property owner participation. Additional press releases will be issued, as needed, to spur interest in the program and to announce any major changes in the program.

The Housing Commission has a brochure explaining the program to both participants and to rental property owners. The brochure was designed similar to HUD's brochure, "A Good Place to Live". It will include the prominent use of the Equal Housing Opportunity Logo, Slogan or Statement will conform to HUD's proposed Advertising Guidelines for Fair Housing. Copies of the brochure will be provided to HUD when they are completed.

The Luce County Housing Commission has developed contracts with the Luce County Family Independence Agency, The Chippewa, Luce and Mackinaw Community Action Agency and with the local Indian tribes for their Community Development Block Grant Programs. These contacts have proved useful in reaching lower income families in need of housing assistance. The Family Independence Agency has contacts with large variety of lower income persons including minorities, elderly and handicapped, as does the Chippewa, Luce Mackinaw Community

Action Agency. The County's largest minority group, American Indian, will also be informed through the local tribes. The Housing Commission through a letter will inform these groups of this program and a supply of brochures will be provided to them for distribution to the group's clientele or membership. Follow-up contacts will be made by telephone or visit to insure these groups understand the program and are distributing the information.

In order to insure participation from rental property owners, the Housing Commission will contact local real estate agents and apartment owners. The Commission will send them letter and copies of the brochure to spur their interest. This contact will be followed up by telephone calls and visits to keep their interest renewed.

B. SPECIAL EFFORTS TO ATTRACT FAMILIES

The Housing Commission's past experience with their Community Development Block Grant Housing Rehabilitation programs has shown that their existing outreach efforts have been sufficient to encourage groups to seek available housing assistance. For instance, the County's 1980 CDBG Housing Rehabilitation program assisted 79 low-to moderate-income households in Luce County. Of those households, 10% were minority families, 47% were elderly or handicapped, 13% were large households and 52% were low income (family income below 50% of the County's median). When looking at the County's population as a whole, four percent are minorities, 13.7% are elderly 15.5% are handicapped ("non-institutionalized persons with a work disability"), 13.8% have five or more persons per household and 19.7 percent are low-income households. Because the Housing Commission has been so successful in reaching these "special groups" they plan on continuing the kinds of outreach efforts they established for their housing rehabilitation program into the voucher program.

Because Luce County is largely rural in nature and has a population of 6,659 persons, there are only two local sources for paid advertising. The County's only media consists of the weekly paper, *The Newberry News* and the local radio stations (WNBX). The County as an outreach mechanism to reach special groups in the County, as described in Section A, will use these two sources.

C. SPECIAL EFFORTS TO ENCOURAGE OWNER AND BROKER PARTICIPATION

As indicated previously, Luce County is a small, rural county. The population is concentrated in the Village of Newberry and southward into McMillan Township and Pentland Township with the rest of the

County being very sparsely populated. Accordingly most of the rental properties are found within the more populated areas. There are only two apartment buildings, one privately owned and located in Pentland Township and the other being the senior citizen apartment complex in Newberry. All other rental properties are privately owned houses; houses divided into apartments or house trailers and most of these are located in Newberry or just below Newberry in McMillan and Pentland Townships. A look at the 1980 Census figures shows that concentrations of low to moderate-income persons are found in northern and northeastern McMillan Township and in Columbus and Lakefield Townships (from 68% to 54% of the population). The areas of the County that have the greatest concentration of rental units have some of the lowest concentration of low to moderate-income persons. The apartment complex in Pentland Township, for example, is in Enumeration District 139, which has the second lowest percentage of low to moderate-income persons in the County (27.7%). Newberry's ED 126 has the lowest percentage of low to moderate-income person of 21.9% with the remainder of Newberry and southern McMillan Township's figures ranging around 40%.

Census figures are not available by Enumeration District showing percentage of minorities in Luce County. However, data at the township level shows that most of the County's minority families live in the County's more populated areas of Newberry, McMillan and Pentland Townships. In spite of this, however, concentrations of minorities in these areas are not very high.

For example, Newberry has a 4.1% minority population, and McMillan and Pentland Townships each have 4.5% minorities, all of which are very close to the County's overall percentage of our percent minority population.

Columbus and Lakefield Townships, on the other hand, have very low minority populations of 1.57% and 1.2% respectively.

In conclusion, the data shows that Luce County's rental housing stock, while scattered throughout a fairly concentrated area, is not located in areas of high concentrations of low-income persons or minorities. The Housing Commission feels that any rental properties in the County which meet building code requirements, will also meet the HUD requirement of being outside areas of concentrations of minorities and low-income persons. They, therefore, feel that there is not special need in Luce County to encourage participation o rental property owners in areas other than low-income or minority concentrated areas.

They do however, plan on advertising to encourage owner participation, as outlined in Section A.

D. ESTABLISHMENT OF WAITING LIST AND ISSUANCE OF VOUCHERS

(See Administrative Plan)

The Housing Commission will:

- A. Prepare a written summary sheet of vital program information to give to all Voucher Holders. Housing Commission staff will review this information with each voucher holder when they first enter the program, to insure that they full understand the provisions. The informational summary sheet will be conformance with Section 8 - Housing Assistance Payment Program.
- B. Attach a list of persons who will conduct any briefing sessions and a statement of the training each has received or will receive regarding implementation of local, State or federal fair housing laws.
- C. The Luce County Housing Commission Executive Director is Erin A. Teske. Mrs. Teske will administer the Luce County Community Development Block Grant Housing Rehabilitation program and manage the 40-unit elderly apartment in Newberry, along with 110 Vouchers for the Section 8 Program.

Mrs. Teske and staff will conduct briefing sessions with voucher holders. She and the staff are cognizant of local, State and federal fair housing laws.

- D. Allow the Section 8 Rental Program complainant(s) a hearing under their "Grievance Policy" policy. In all cases, if individuals are not satisfied with actions taken at the local level, they will be advised to seek assistance from the appropriate State or Federal Agency and those they may seek the advice of a private attorney.

E. STAFFING

As mentioned previously, Luce County does not have a very socially or ethnically varied population. The 1980 Census figures showed Luce County to have 4% minorities, of which .01% were black, 3.8% American Indian and .2% Asian. The County had only .2% Spanish origin population. In spite of this, the Housing Commission is sensitive

to the needs of its minority population and encourages their participation in its housing assistance program. In the County's 1980 CDBG program for example, 10% of those households served were minority families.

The staff to be used for this program consists of the Executive Director and full-time secretarial help. White females currently hold both positions. The Housing Commission however abides by Luce County's hiring practices. All advertisements for employment state, "all qualified applicants will receive consideration for employment without regard to race, color, religion, sex or national origin".

The Housing Commission abides by the Luce County Affirmative Action Statement, which is attached.

ORGANIZATION CHART

LUCE COUNTY HOUSING COMMISSION

John Wendt	Chairperson
Steve Wolfgang	Vice Chairperson
Dale Immel	Member
William Abram	Member
Mary Lou Fossitt	Resident Member

EXECUTIVE DIRECTOR Erin A. Teske

ADMINISTRATIVE SECRETARY CUSTODIAN Ramona Marks Swanson	CHIEF Ken
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March 2004