

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

PHA Plans

5 Year Plan for Fiscal Years 2005 - 2009
Annual Plan for Fiscal Year 2006

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

**PHA Plan
Agency Identification**

PHA Name: Indianapolis Housing Agency (IHA)

PHA Number: IN017

PHA Fiscal Year Beginning: 01/2006

Public Access to Information

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

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

Display Locations For PHA Plans and Supporting Documents

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

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

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)

5-YEAR PLAN
PHA FISCAL YEARS 2005 - 2009
[24 CFR Part 903.5]

A. Mission

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

- The mission of the PHA is the same as that of the Department of Housing and Urban Development: To promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.
- The PHA's mission is: **To be a top-performing agency that provides quality and affordable housing; contributes to safe communities; encourages individual and family self-sufficiency; and affirmatively promotes fair housing.**

B. Goals

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

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

- PHA Goal: Expand the supply of assisted housing
Objectives:
- Apply for additional rental vouchers: **Increase voucher population by 5% annually per HUD's availability of additional rental vouchers**
- Reduce public housing vacancies: **Maintain a minimum 97% adjusted occupancy rate**
- Leverage private or other public funds to create additional housing opportunities: **Leverage the use of private/ public funds for the redevelopment, rehabilitation, acquisition and/or ownership interest/partnerships in properties**
- Acquire or build units or developments: **Acquire or have ownership interest in a minimum of two (2) development sites**
- Other (list below)

- PHA Goal: Improve the quality of assisted housing
Objectives:
- Improve public housing management: (PHAS score) **Increase PHAS score to 90 total points and complete decentralization (site-based) of property management by 2006**
 - Improve voucher management: (SEMAP score): **Increase SEMAP score to 90 total points; increase utilization rate to 98%; and maintain 98% or greater utilization rate**
 - Increase customer satisfaction: **Develop a process to survey and engage client's customer satisfaction annually and address any concerns accordingly; achieve a 90 % customer satisfaction rate by year- end 2009**
 - Concentrate on efforts to improve specific management functions: (list; e.g., public housing finance; voucher unit inspections) **Initiate Decentralization of Site-based Management (public housing); improve overall SEMAP score in the following areas: inspections, rent calculations, and re-certification**
Increase PHAS financial score to 14 by 12/31/05, 18 by 2006, and achieve high performance status by 12/31/07
 - Renovate or modernize public housing units: **100% of existing modernization units over 5 years (20% each year)**
 - Demolish or dispose of obsolete public housing: **IHA has no current plans on demolishing or disposing of any of its existing communities. However, IHA will evaluate its housing and non-dwelling properties to determine if any strategic or individualized unit demolition would be beneficial to the Agency for legitimate affordable housing purposes, including but not limited to health and safety, deconcentration, redevelopment, or any other legitimate business purpose as defined by IHA. IHA is particularly concerned regarding the availability of current Capital Fund proceeds to address capital needs over the next five years. IHA will also conduct an analysis of its existing housing stock to determine the "best and highest use" of each its properties. The analysis may be conducted on IHA's entire stock or in phases, as determined to be reasonable and appropriate by IHA.**

(continued)

Based on IHA's analysis, the appropriateness of any disposition application will be considered, and said application would be submitted as required.

- Provide replacement public housing: **IHA will include public housing replacement in all qualified mixed-finance/mixed use developments acquired and/or sponsored by the agency (2 site developments over 5 years)**
 - Provide replacement vouchers: **IHA will provide an adequate number of replacement vouchers for all eligible participants and develop policies and procedures for this process (50 replacement vouchers over five years) if applicable through HUD's allocation of replacement vouchers**
 - Other: (list below)
-
- PHA Goal: Increase assisted housing choices
Objectives:
 - Provide voucher mobility counseling: **125 clients served through mobility counseling over a five-year period**
 - Conduct outreach efforts to potential voucher landlords: **Conduct a minimum of two (2) annual landlord informational fairs; maintain and improve landlord website, guides, and other marketing activities**
 - Increase voucher payment standards:
 - Implement voucher homeownership program: **100 clients served through voucher homeownership program over a five-year period -Marion County Center for Housing Opportunities (MCCHO) /Resident Opportunities Supportive Services (ROSS)-Homeownership Supportive Services (HSS)**
 - Implement public housing or other homeownership programs: **Implement section 32 homeownership program by 2006, and continue the ROSS Housing Supportive Services (HSS) program for public housing residents—In 2005, IHA decided not to proceed with the Section 32 program, but will possibly consider this program within the 5 –year goals**

- Implement public housing site-based waiting lists: **Continue utilizing site-based waiting list (completed in 2002)**
- Convert public housing to vouchers: **IHA will perform an analysis to determine appropriateness of conversion plan (s), and based on that determination may implement a program where appropriate with HUD's mandate**
- Other: **Projects will be designed to promote opportunities that increase assisted housing choices such as the current Project-based Section 8 voucher program (10% maximum of total voucher utilization)**

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: **Implementing measures to require mandatory FSS programs for all public housing family sites, which will be phased in over the next 5 years (resident ages 19-64)**
Tracking and documenting income levels at all public housing sites or further analysis of deconcentration plan
 - Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments: **IHA will establish a process to insure mixed- income criteria in all project developments to promote mixed-income communities (HOPE VI projects: Concord and Brokenburr Trails)**
 - Implement public housing security improvements: **Implementing a public safety electronic security system in all senior communities**
 - Designate developments or buildings for particular resident groups (elderly, persons with disabilities): **IHA will perform due diligence to apply for additional designated housing, where appropriate based on the result of the analysis conducted**
 - Other: **Implement energy savings improvements and asset modernization at various family sites, and develop IDA's (Individual Development Accounts) programs for eligible residents**

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: **The proposed mandatory FSS program for public housing residents (10% increase over the next 5 years)**
- Provide or attract supportive services to improve assistance recipients' employability: **Maintain memorandums of understanding agreements with human service organizations that emphasize employment and training (# 100 total service providers)**
- Provide or attract supportive services to increase independence for the elderly or families with disabilities: **Maintain memorandums of understanding agreements with human service organizations that assist elderly and disabled populations**
Pursue external vendors for assisted living programs and services
Continue to provide mobility counseling and homeownership programs to the elderly and disabled through partnerships
- Other: **Continue to comply with HUD's Mandatory Earned Income Disallowance (MEID) for public housing residents**
Create or sponsor a youth development program that focuses on life skills, higher education, and job readiness

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: **Continue disseminating housing information to the community at-large through promotional materials, presentations, training seminars, and counseling sessions on Fair Housing issues. Fair housing information is displayed at all IHA communities**
- 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:
Continue partnering with the Institute on Disability and Community and The Indiana Center for Residential on assisted housing issues

- Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required: **Continue partnering with the Institute on Disability and Community and The Indiana Center for Residential living to provide supportive services as well as homeownership opportunities.**
IHA will provide project-based vouchers for the above issue (15-20 over the next 5 years)

- Other: **Increase MCCHO's (IHA program) service level as an intake and referral intermediary for individuals and families experiencing discrimination. Pursuing partnerships and funding opportunities to further expand fair housing services**

Other PHA Goals and Objectives: (list below)

Annual PHA Plan
PHA Fiscal Year 2006
[24 CFR Part 903.7]

i. Annual Plan Type:

Select which type of Annual Plan the PHA will submit.

Standard Plan

Streamlined Plan:

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

Troubled Agency Plan

ii. Executive Summary of the Annual PHA Plan

[24 CFR Part 903.7 9 (r)]

Provide a brief overview of the information in the Annual Plan, including highlights of major initiatives and discretionary policies the PHA has included in the Annual Plan.

In 2005, the Indianapolis Housing Agency (IHA) had to endure some very challenging times. The agency's funding and staff reductions, which interim led to reduced client services. IHA began re-evaluating internal mechanisms in order to produce the same efficient programs with fewer resources. Nonetheless, dedicated staff continues to work diligently to ensure client success and availability of needed housing assistance. The agency is in the process of implementing policy and procedure recommendations outlined in a Memorandum of Agreement (MOA) between HUD, the City of Indianapolis, and IHA.

The following information contained in this document describes the Agency's annual plan towards continued management restructuring of the public housing and the Section 8 voucher program. With these efforts, the Agency's long-term goal is to achieve high-performing status in both programs and to otherwise provide high-quality housing to eligible participants in the most cost-effective manner that also promotes self-sufficiency.

iii. Annual Plan Table of Contents

[24 CFR Part 903.7 9 (r)]

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

Table of Contents

	<u>Page #</u>
Annual Plan	
i. Executive Summary	1
ii. Table of Contents	2
1. Housing Needs	6-14
2. Financial Resources	14-15
3. Policies on Eligibility, Selection and Admissions	15-24
4. Rent Determination Policies	25-29
5. Operations and Management Policies	29-30
6. Grievance Procedures	30-31
7. Capital Improvement Needs	31-33
8. Demolition and Disposition	33-34
9. Designation of Housing	34-35
10. Conversions of Public Housing	35-36
11. Homeownership	37-38
12. Community Service Programs	39-41
13. Crime and Safety	41-43
14. Pets (Inactive for January 1 PHAs)	43
15. Civil Rights Certifications (included with PHA Plan Certifications)	43
16. Audit	44
17. Asset Management	44
18. Other Information	45-47

Attachments

Indicate which attachments are provided by selecting all that apply. Provide the attachment's name (A, B, etc.) in the space to the left of the name of the attachment. Note: If the attachment is provided as a **SEPARATE** file submission from the PHA Plans file, provide the file name in parentheses in the space to the right of the title.

Required Attachments:

- Attachment A-** Admissions Policy for Deconcentration
- Attachment B-** FY 2006 Capital Fund Program Annual Statement
- Attachment C-** Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)

Optional Attachments:

- Attachment D-** PHA Management Organizational Chart
- Attachment E-** FY 2005-2009 Capital Fund Program 5 Year Action Plan
- Public Housing Drug Elimination Program (PHDEP) Plan
- Comments of Resident Advisory Board or Boards (must be attached if not included in PHA Plan text)
- Other (List below, providing each attachment name)

Attachment F - Resident Advisory Board Membership

Attachment G - 2005-2009 5- Year Goals/Achievement Summary

Attachment H - Section 8 Administrative Plan

Attachment I - Admissions & Continued Occupancy Policy (ACOP)

Attachment J - Significant Amendment and Substantial Deviation Statement

Attachment K - Community and Self- Sufficiency Policy & Procedure

Attachment L - Pet Policy – Lease Addendum

Attachment M- Resident Comments

Supporting Documents Available for Review

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

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
X	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations	5 Year and Annual Plans
X	State/Local Government Certification of Consistency with the Consolidated Plan	5 Year and Annual Plans
X	Fair Housing Documentation: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions’ initiatives to affirmatively further fair housing that require the PHA’s involvement.	5 Year and Annual Plans
	Consolidated Plan for the jurisdiction/s in which the PHA is	Annual Plan:

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
	located (which includes the Analysis of Impediments to Fair Housing Choice (AI)) and any additional backup data to support statement of housing needs in the jurisdiction	Housing Needs
X	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources;
X	Public Housing Admissions and (Continued) Occupancy Policy (A&O), which includes the Tenant Selection and Assignment Plan [TSAP]	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public Housing Deconcentration and Income Mixing Documentation: 1. PHA board certifications of compliance with deconcentration requirements (section 16(a) of the US Housing Act of 1937, as implemented in the 2/18/99 <i>Quality Housing and Work Responsibility Act Initial Guidance; Notice</i> and any further HUD guidance) and 2. Documentation of the required deconcentration and income mixing analysis	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public housing rent determination policies, including the methodology for setting public housing flat rents <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Schedule of flat rents offered at each public housing development <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
X	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation)	Annual Plan: Operations and Maintenance
X	Public housing grievance procedures <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
X	Section 8 informal review and hearing procedures <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
X	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant year	Annual Plan: Capital Needs

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
X	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant	Annual Plan: Capital Needs
	Most recent, approved 5 Year Action Plan for the Capital Fund/Comprehensive Grant Program, if not included as an attachment (provided at PHA option)	Annual Plan: Capital Needs
X	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans or any other approved proposal for development of public housing	Annual Plan: Capital Needs
X	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	Annual Plan: Conversion of Public Housing
X	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership
X	Policies governing any Section 8 Homeownership program <input checked="" type="checkbox"/> check here if included in the Section 8 Administrative Plan	Annual Plan: Homeownership
X	Any cooperative agreement between the PHA and the TANF agency	Annual Plan: Community Service & Self-Sufficiency
X	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
X	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports	Annual Plan: Community Service & Self-Sufficiency
	The most recent Public Housing Drug Elimination Program (PHEDEP) semi-annual performance report for any open grant and most recently submitted PHDEP application (PHDEP Plan)	Annual Plan: Safety and Crime Prevention
X	The most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h)), the results of that audit and the PHA's response to any findings	Annual Plan: Annual Audit
X	Troubled PHAs: MOA/Recovery Plan	Troubled PHAs
	Other supporting documents (optional) (list individually; use as many lines as necessary)	(specify as needed)

1. Statement of Housing Needs

[24 CFR Part 903.7 9 (a)]

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

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

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Loca-tion
Income <= 30% of AMI	30,704	5	5	5	4	3	3
Income >30% but <=50% of AMI	34,468	4	5	5	4	3	4
Income >50% but <80% of AMI	48,881	3	3	4	2	4	5
Elderly	15,909	4	5	3	2	1	3
Families with Disabilities	98,000 persons	4	4	3	5	3	4
Race/Ethnicity							
White:	58,335	3	4	3	4	2	2
White-Hispanic	5,590	4	4	3	4	2	2
Black	34,686	5	4	3	4	2	3
American Indian	430	3	4	3	4	2	3
Asian Pacific	2007	2	4	3	4	2	3

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

- Consolidated Plan of the Jurisdiction/s
Indicate year: **2005-2009 City of Indianapolis-- Consolidated Plan**
- U.S. Census data: the Comprehensive Housing Affordability Strategy ("CHAS") dataset
- American Housing Survey data
Indicate year:
- Other housing market study

Indicate year:

Other sources: **2000 U.S. Census Bureau**

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

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

Housing Needs of Families on the Waiting List PUBLIC HOUSING Data Source: CCS data as of 10/01/2005			
Waiting list type: (select one) <input type="checkbox"/> Section 8 tenant-based assistance <input checked="" 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 (10/1/04-9/30/05)
Waiting list total	1056		373
Extremely low income <=30% AMI	939	88.92%	
Very low income (>30% but <=50% AMI)	110	10.42%	
Low income (>50% but <80% AMI)	7	0.66%	
Families with children	647	56.8%	
Elderly families	51	5.4%	
Families with Disabilities	177	21.0%	
White/Non-Hisp	93	10.0%	
White/Hisp	11	1.1%	
Black/Non-Hisp	942	87.7%	
Black/Hisp	1	0.1%	
Indian/Non-Hisp	3	0.5%	
Asian/Non-Hisp	1	0.1%	
Pacific/Non-Hisp	5	0.5%	

Characteristics by Bedroom Size (Public Housing Only)			
1BR	367	34.8%	156
2 BR	424	40.1%	77
3 BR	222	21.0%	101
4 BR	41	3.9%	26
5 BR	2	0.2%	13
5+ BR	0	0.0%	0
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			
If yes:			
How long has it been closed (# of months)?			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes			

Housing Needs of Families on the Waiting List			
SECTION 8 Table 1 – Lottery Winners Drawn or Special Categories as of 10/1/05			
Data Source: CCS data as of 10/01/2005			
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 (10/1/04-9/30/05)
Waiting list total	592		1949
Extremely low income <=30% AMI	463	78.21%	
Very low income (>30% but <=50% AMI)	105	17.74%	
Low income (>50% but <80% AMI)	24	4.05%	
Families with children	348	58.7%	
Elderly families	23	4.0%	
Families with Disabilities	47	8.2%	

Housing Needs of Families on the Waiting List			
SECTION 8 Table 1 – Lottery Winners Drawn or Special Categories as of 10/1/05			
Data Source: CCS data as of 10/01/2005			
White/Non-Hisp	52	9.1%	
White/Hisp	15	2.8%	
Black/Non-Hisp	517	86.9%	
Black/Hisp	1	0.2%	
Indian/Non-Hisp	3	0.5%	
Asian/Non-Hisp	1	0.0%	
Pacific/Non-Hisp	3	0.5%	

Characteristics by Bedroom Size (Public Housing Only)			
1BR	N/A	N/A	N/A
2 BR	N/A	N/A	N/A
3 BR	N/A	N/A	N/A
4 BR	N/A	N/A	N/A
5 BR	N/A	N/A	N/A
5+ BR	N/A	N/A	N/A
Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			
If yes:			
How long has it been closed (# of months)? 12			
Does the PHA expect to reopen the list in the PHA Plan year? <input checked="" 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 checked="" type="checkbox"/> Yes			

Housing Needs of Families on the Waiting List			
SECTION 8 Table 2 – Lottery Winners Not Drawn as of 10/1/04			
Data Source: Lottery application forms			
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 (10/1/04-9/30/05)
Waiting list total	4200		1949
Extremely low income <=30% AMI	3423	81.50%	

Housing Needs of Families on the Waiting List
SECTION 8 Table 2 – Lottery Winners Not Drawn as of 10/1/04
Data Source: Lottery application forms

Very low income (>30% but <=50% AMI)	659	15.69%	
Low income (>50% but <80% AMI)	118	2.81%	
Families with children	2467	58.74%	
Elderly families	198	4.71%	
Families with Disabilities	656	15.62%	
White/Non-Hisp	241	5.74%	
White/Hisp	10	0.24%	
Black/Non-Hisp	3673	87.45%	
Black/Hisp	18	0.43%	
Indian/Non-Hisp	50	1.19%	
Indian/Hisp	3	0.07%	
Asian/Non-Hisp	8	0.19%	
Asian/Hisp	0	0.00%	
Pacific/Non-Hisp	0	0.00%	
Pacific/Hisp	1	0.02%	
N/A or mixed race	196	4.67%	

Characteristics by Bedroom Size (Public Housing Only)			
1BR	N/A	N/A	N/A
2 BR	N/A	N/A	N/A
3 BR	N/A	N/A	N/A
4 BR	N/A	N/A	N/A
5 BR	N/A	N/A	N/A
5+ BR	N/A	N/A	N/A

Is the waiting list closed (select one)? No Yes
 If yes:
 How long has it been closed (# of months)? 12
 Does the PHA expect to reopen the list in the PHA Plan year? No Yes
 Does the PHA permit specific categories of families onto the waiting list, even if generally closed? No Yes

C. Strategy for Addressing Needs

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

(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, **if needed and IHA can utilize in accordance with HUD requirements**
- 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: **The Agency continues to explore options to provide the necessary capital not just to address backlog capital needs but also to attract a healthy mix of incomes. One such strategy is the Administration's Public housing**

project-based Section 8. Should legislation be passed enacting this or some similar program, the IHA would likely pursue the program.

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: **The Agency will continue to explore additional funding opportunities with the City of Indianapolis and other human service organizations that provide resources to this targeted population through collaborative efforts.**

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: **Implementing measures to require mandatory FSS programs for all public housing family sites, which will be phased in over the next 5 years (resident ages 19-64)**

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,
If feasible after an analysis of current senior sites that currently include elderly and disabled populations
- Apply for special-purpose vouchers targeted to the elderly, should they become available,
If needed and IHA can utilize in accordance with HUD requirements
- 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 (**Completed in 2002**)
- Apply for special-purpose vouchers targeted to families with disabilities, should they become available,
If needed and IHA can utilize in accordance with HUD requirements
- Affirmatively market to local non-profit agencies that assist families with disabilities
- Other: **Enter into additional memorandums of Understanding with Service Providers that offer assistance to families with disabilities, if deemed necessary by IHA 's assessment of current providers**

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: **Counsel public housing residents through the ROSS HHS program and Section 8 clients with the Homeownership voucher program**

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

(2) Reasons for Selecting Strategies

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

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

2. Statement of Financial Resources

[24 CFR Part 903.7 9 (b)]

List the financial resources that are anticipated to be available to the PHA for the support of Federal public housing and tenant-based Section 8 assistance programs administered by the PHA during the Plan year.

Note: the table assumes that Federal public housing or tenant based Section 8 assistance grant funds are expended on eligible purposes; therefore, uses of these funds need not be stated. For other funds, indicate the use for those funds as one of the following categories: public housing operations, public housing capital improvements, public housing safety/security, public housing supportive services, Section 8 tenant-based assistance, Section 8 supportive services or other.

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2005 grants)		
a) Public Housing Operating Fund	4,544,238	
b) Public Housing Capital Fund	4,071,970	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	43,613,261	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)		
g) Resident Opportunity and Self-Sufficiency Grants		
h) Community Development Block Grant		
i) HOME		
Other Federal Grants (list below)		

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
2. Prior Year Federal Grants (unobligated funds only) (list below)		
Capital Funds	3,052,137	Public Housing Capital Needs
Resident Opportunity and Self-Sufficiency Grant	88,495	Public Housing Supportive Services
3. Public Housing Dwelling Rental Income	3,065,415	Public Housing Operations
4. Other income (list below)		
Foundations	26,000	
4. Non-federal sources (list below)		
Total resources	58,461,516	

3. PHA Policies Governing Eligibility, Selection, and Admissions

[24 CFR Part 903.7 9 (c)]

A. Public Housing

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

(1) Eligibility

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

When families are within a certain number of being offered a unit: (state number)

When families are within a certain time of being offered a unit: **(7-14 days)**

Other: **At point of application**

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, **Only applicable at Concord Eagle Creek**
- Other **Credit checks for all sites**

- 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. 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?
IHA will operate site-based waiting list at all sites

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? **Two (2)**

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:

Interested persons can obtain site location and management contact information from the main administrative offices at IHA

(3) Assignment

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

- One
- Two
- Three or More

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

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

(4) Admissions Preferences

a. Income targeting:

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

b. Transfer policies:

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

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

Disaster-Affected Families receiving Public Housing Assistance

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):

**Disaster-Affected Families receiving Public Housing Assistance
Barton Towers preference only- Midtown Mental Health (Agency governed by Health and Hospital Corporation) clients will be referred by caseworkers to reside at Barton Towers in accordance with the MOA between IHA and Health and Hospital Corporation**

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 **(1)**

Former Federal preferences:

- Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition) **(1)**

- 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 (1)
- Veterans and veterans' families
- Residents who live and/or work in the jurisdiction
- Those enrolled currently in educational, training, or upward mobility programs (2)
- 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 (2)**
- Victims of reprisals or hate crimes
- Other preference(s):
Disaster-Affected Families receiving Public Housing Assistance (1)
Barton Towers preference only- Midtown Mental Health (Agency governed by Health and Hospital Corporation) clients will be referred by caseworkers to reside at Barton Towers in accordance with the MOA between IHA and Health and Hospital Corporation (1)

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: Did the PHA's analysis of its family (general occupancy) developments to determine concentrations of poverty indicate the need for measures to promote deconcentration of poverty or income mixing?

b. Yes No: Did the PHA adopt any changes to its **admissions policies** based on the results of the required analysis of the need to promote deconcentration of poverty or to assure income mixing?

c. If the answer to b was yes, what changes were adopted? (select all that apply)

Adoption of site based waiting lists

If selected, list targeted developments below:

Employing waiting list "skipping" to achieve deconcentration of poverty or income mixing goals at targeted developments

If selected, list targeted developments below:

Employing new admission preferences at targeted developments

If selected, list targeted developments below:

Other (list policies and developments targeted below)

d. Yes No: Did the PHA adopt any changes to **other** policies based on the results of the required analysis of the need for deconcentration of poverty and income mixing?

e. If the answer to d was yes, how would you describe these changes? (select all that apply)

Additional affirmative marketing

Actions to improve the marketability of certain developments

Adoption or adjustment of ceiling rents for certain developments

Adoption of rent incentives to encourage deconcentration of poverty and income-mixing

Other (list below)

f. Based on the results of the required analysis, in which developments will the PHA make special efforts to attract or retain higher-income families? (select all that apply)

- Not applicable: results of analysis did not indicate a need for such efforts
- List (any applicable) developments below: **Beechwood (completed 2002), Hawthorne/Blackburn (completed 2003), Twin Hills/Rowney (completed 2004)**

g. Based on the results of the required analysis, in which developments will the PHA make special efforts to assure access for lower-income families? (select all that apply)

- Not applicable: results of analysis did not indicate a need for such efforts
- List (any applicable) developments below:

B. Section 8

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

(1) Eligibility

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

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

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

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

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

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

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

(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:
The Section 8 Waiting list is currently closed; IHA conducted a lottery system for vouchers in 2004
- 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: **At the written request of the family, IHA may extend the term of the voucher an additional 30 days**

(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**)

National and/or State Disaster-Affected Families

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): **Disaster-Affected Families receiving Section 8 Assistance**

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 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): **Disaster-Affected Families receiving Section 8 Assistance (1)**

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: **Informal Hearing and Reviews**

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

- Through published notices
- Other (list below):
Marketing Campaign that includes promotional news- print, media, brochures, and flyers. These marketing materials are distributed to Community Development Corporations (CDC's), not-for profits, churches, and local government offices.

4. PHA Rent Determination Policies

[24 CFR Part 903.7 9 (d)]

A. Public Housing

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

(1) Income Based Rent Policies

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

a. Use of discretionary policies: (select one)

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

---or---

- The PHA employs discretionary policies for determining income based rent (If selected, continue to question b.)

b. Minimum Rent

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

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

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

3. If yes to question 2, list these policies below: **Stated in the Admission and Continued Occupancy Policy (Income Disregard)**

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

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

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

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

For the earned income of a previously unemployed household member

For increases in earned income

Fixed amount (other than general rent-setting policy)

If yes, state amount/s and circumstances below:

Fixed percentage (other than general rent-setting policy)

If yes, state percentage/s and circumstances below:

For household heads

For other family members

For transportation expenses

For the non-reimbursed medical expenses of non-disabled or non-elderly families

Other (describe below)

e. Ceiling rents

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

Yes for all developments

Yes but only for some developments

No

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

For all developments

For all general occupancy developments (not elderly or disabled or elderly only)

For specified general occupancy developments

For certain parts of developments; e.g., the high-rise portion

For certain size units; e.g., larger bedroom sizes

Other (list below)

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

- Market comparability study
- Fair market rents (FMR)
- 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: **Any time the family experiences an income decreases**

- 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

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

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

IHA completed an area market study (fair market rents) in 2004, and based on the findings, IHA's flat rents should be adjusted to reflect an increase in flat rental rates. In 2005, IHA did not adjust the flat-rents; however, the proposed flat rents are still under consideration for the 2006 annual plan

Proposed flat rental rates below:

Bedroom Size	Flat Rental Rates
1 BDR	\$425
2 BDR	\$510
3 BDR	\$610
4 BDR	\$710
5 BDR	\$750

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: **Reduced Section 8 administrative budget**

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: **Annually and/ or as needed due to budget constraints**

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: **Budget constraints**

(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) **Stated in the Section 8 Administrative Plan**

5. Operations and Management

[24 CFR Part 903.7 9 (e)]

Exemptions from Component 5: High performing and small PHAs are not required to complete this section. Section 8 only PHAs must complete parts A, B, and C(2)

A. PHA Management Structure

Describe the PHA's management structure and organization.

(select one)

- An organization chart showing the PHA's management structure and organization is attached. (**Attachment D**)
 A brief description of the management structure and organization of the PHA follows:

B. HUD Programs Under PHA Management – CCS data as of 09/01/2005

List Federal programs administered by the PHA, number of families served at the beginning of the upcoming fiscal year, and expected turnover in each. (Use "NA" to indicate that the PHA does not operate any of the programs listed below.)

Program Name	Units or Families Served at Year Beginning (10/01/05)	Expected Turnover (Based on 10/1/04-9/30/05)
Public Housing	1607	373
Section 8 Vouchers	6011	1921

Section 8 Certificates	108	28
Section 8 Mod Rehab	0	0
Special Purpose Section 8 Certificates/Vouchers (list individually)	0	0
Public Housing Drug Elimination Program (PHDEP)		
Other Federal Programs(list individually)		

C. Management and Maintenance Policies

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

- (1) Public Housing Maintenance and Management: (list below)
Policy on Housekeeping and Maintenance Standards (ACOP attachment)
- (2) Section 8 Management: (list below)
Section 8 Administrative Plan Attachment

6. PHA Grievance Procedures

[24 CFR Part 903.7 9 (f)]

Exemptions from component 6: High performing PHAs are not required to complete component 6. Section 8-Only PHAs are exempt from sub-component 6A.

A. Public Housing

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

If yes, list additions to federal requirements below: **Stated in the ACOP Attachment**

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

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

B. Section 8 Tenant-Based Assistance

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

If yes, list additions to federal requirements below: **State in the Section 8 Administrative Plan Attachment**

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

- PHA main administrative office
 Other (list below)

7. Capital Improvement Needs

[24 CFR Part 903.7 9 (g)]

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

A. Capital Fund Activities

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

(1) Capital Fund Program Annual Statement

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

Select one:

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

-or-

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

(2) Optional 5-Year Action Plan

Agencies are encouraged to include a 5-Year Action Plan covering capital work items. This statement can be completed by using the 5 Year Action Plan table provided in the table library at the end of the PHA Plan template **OR** by completing and attaching a properly updated HUD-52834.

- a. Yes No: Is the PHA providing an optional 5-Year Action Plan for the Capital Fund? (if no, skip to sub-component 7B)

b. If yes to question a, select one:

- The Capital Fund Program 5-Year Action Plan is provided as an attachment to the PHA Plan at Attachment (state name

-or-

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

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

Applicability of sub-component 7B: All PHAs administering public housing. Identify any approved HOPE VI and/or public housing development or replacement activities not described in the Capital Fund Program Annual Statement.

- Yes No: a) Has the PHA received a HOPE VI revitalization grant? (if no, skip to question c; if yes, provide responses to question b for each grant, copying and completing as many times as necessary)
b) Status of HOPE VI revitalization grant (complete one set of questions for each grant)

1. Development name: **Brokenburr Trails**
2. Development (project) number: **16**
3. Status of grant: (select the statement that best describes the current status)
 - Revitalization Plan under development
 - Revitalization Plan submitted, pending approval
 - Revitalization Plan approved
 - Activities pursuant to an approved Revitalization Plan underway

Yes No: c) Does the PHA plan to apply for a HOPE VI Revitalization grant in the Plan year?
If yes, list development name/s below:

Yes No: d) Will the PHA be engaging in any mixed-finance development activities for public housing in the Plan year?
If yes, list developments or activities below:
Brokenburr Trial Project # 16

Yes No: e) Will the PHA be conducting any other public housing development or replacement activities not discussed in the Capital Fund Program Annual Statement?
If yes, list developments or activities below:
Purchase and/or rehabilitation of units with Replacement Housing Factor Funds (Public housing units)

8. Demolition and Disposition

[24 CFR Part 903.7 9 (h)]

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

1. Yes No: Does the PHA plan to conduct any demolition or disposition activities (pursuant to section 18 of the U.S. Housing Act of 1937 (42 U.S.C. 1437p)) in the plan Fiscal Year? (If “No”, skip to component 9; if “yes”, complete one activity description for each development.)

2. Activity Description

Yes No: Has the PHA provided the activities description information in the **optional** Public Housing Asset Management Table? (If “yes”, skip to component 9. If “No”, complete the Activity Description table below.)

Demolition/Disposition Activity Description	
1a. Development name:	John J. Barton Apartments (a parcel of vacant land)
1b. Development (project) number:	007
2. Activity type:	Demolition <input type="checkbox"/> Disposition <input checked="" type="checkbox"/>
3. Application status (select one)	Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>

4. Date application approved, submitted, or planned for submission: (9/1/06)
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 03/01/06 b. Projected end date of activity: 12/31/06

Demolition/Disposition Activity Description
1a. Development name: Blackburn Terrace Apartments
1b. Development (project) number: 013
2. Activity type: Demolition <input checked="" type="checkbox"/> Disposition <input type="checkbox"/>
3. Application status (select one) Approved <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input checked="" type="checkbox"/>
4. Date application approved, submitted, or planned for submission: (06/01/06)
5. Number of units affected: 0
6. Coverage of action (select one) <input checked="" type="checkbox"/> Part of the development (Lashonda Davis Center) <input type="checkbox"/> Total development
7. Timeline for activity: a. Actual or projected start date of activity: 03/01/06 b. Projected end date of activity: 12/31/06

9. Designation of Public Housing for Occupancy by Elderly Families or Families with Disabilities or Elderly Families and Families with Disabilities

[24 CFR Part 903.7 9 (i)]

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

1. Yes No: Has the PHA designated or applied for approval to designate or does the PHA plan to apply to designate any public housing for occupancy only by the elderly families or only by families with disabilities, or by elderly families and families with disabilities or will apply for designation for occupancy by only elderly families or only families with disabilities, or by elderly families and families with disabilities as provided by section 7 of the U.S. Housing Act of 1937 (42 U.S.C. 1437e) in the upcoming fiscal year? (If “No”, skip to component 10. If “yes”, complete one activity description for each development, unless the PHA is

eligible to complete a streamlined submission; PHAs completing streamlined submissions may skip to component 10.)

2. Activity Description

Yes No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? If “yes”, skip to component 10. If “No”, complete the Activity Description table below.

Designation of Public Housing Activity Description	
1a. Development name:	
1b. Development (project) number:	
2. Designation type:	Occupancy by only the elderly <input type="checkbox"/> Occupancy by families with disabilities <input type="checkbox"/> Occupancy by only elderly families and families with disabilities <input type="checkbox"/>
3. Application status (select one)	Approved; included in the PHA’s Designation Plan <input type="checkbox"/> Submitted, pending approval <input type="checkbox"/> Planned application <input type="checkbox"/>
4. Date this designation approved, submitted, or planned for submission: _	
5. If approved, will this designation constitute a (select one)	<input type="checkbox"/> New Designation Plan <input type="checkbox"/> Revision of a previously-approved Designation Plan?
6. Number of units affected:	
7. Coverage of action (select one)	<input type="checkbox"/> Part of the development <input type="checkbox"/> Total development

10. Conversion of Public Housing to Tenant-Based Assistance

[24 CFR Part 903.7 9 (j)]

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

A. Assessments of Reasonable Revitalization Pursuant to section 202 of the HUD FY 1996 HUD Appropriations Act

1. Yes No: Have any of the PHA’s developments or portions of developments been identified by HUD or the PHA as covered under section 202 of the HUD FY 1996 HUD Appropriations Act? (If “No”, skip to component 11; if “yes”, complete one activity description for each identified development, unless eligible to complete a streamlined submission. PHAs completing streamlined submissions may skip to component 11.)

2. Activity Description

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

Conversion of Public Housing Activity Description	
1a. Development name:	
1b. Development (project) number:	
2. What is the status of the required assessment?	<input type="checkbox"/> Assessment underway <input type="checkbox"/> Assessment results submitted to HUD <input type="checkbox"/> Assessment results approved by HUD (if marked, proceed to next question) <input type="checkbox"/> Other (explain below)
3. <input type="checkbox"/> Yes <input type="checkbox"/> No: Is a Conversion Plan required? (If yes, go to block 4; if no, go to block 5.)	
4. Status of Conversion Plan (select the statement that best describes the current status)	<input type="checkbox"/> Conversion Plan in development <input type="checkbox"/> Conversion Plan submitted to HUD on: (DD/MM/YYYY) <input type="checkbox"/> Conversion Plan approved by HUD on: (DD/MM/YYYY) <input type="checkbox"/> Activities pursuant to HUD-approved Conversion Plan underway
5. Description of how requirements of Section 202 are being satisfied by means other than conversion (select one)	<input type="checkbox"/> Units addressed in a pending or approved demolition application (date submitted or approved): <input type="checkbox"/> Units addressed in a pending or approved HOPE VI demolition application (date submitted or approved): <input type="checkbox"/> Units addressed in a pending or approved HOPE VI Revitalization Plan (date submitted or approved): <input type="checkbox"/> Requirements no longer applicable: vacancy rates are less than 10 percent <input type="checkbox"/> Requirements no longer applicable: site now has less than 300 units <input type="checkbox"/> Other: (describe below)

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

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

11. Homeownership Programs Administered by the PHA

[24 CFR Part 903.7 9 (k)]

A. Public Housing

Exemptions from Component 11A: Section 8 only PHAs are not required to complete 11A.

1. Yes No: Does the PHA administer any homeownership programs administered by the PHA under an approved section 5(h) homeownership program (42 U.S.C. 1437c(h)), or an approved HOPE I program (42 U.S.C. 1437aaa) or has the PHA applied or plan to apply to administer any homeownership programs under section 5(h), the HOPE I program, or section 32 of the U.S. Housing Act of 1937 (42 U.S.C. 1437z-4). (If “No”, skip to component 11B; if “yes”, complete one activity description for each applicable program/plan, unless eligible to complete a streamlined submission due to **small PHA** or **high performing PHA** status. PHAs completing streamlined submissions may skip to component 11B.)

2. Activity Description

- Yes No: Has the PHA provided all required activity description information for this component in the **optional** Public Housing Asset Management Table? (If “yes”, skip to component 12. If “No”, complete the Activity Description table below.)

Public Housing Homeownership Activity Description (Complete one for each development affected)
1a. Development name: Concord Home West 1b. Development (project) number: 009
2. Federal Program authority: <input type="checkbox"/> HOPE I <input type="checkbox"/> 5(h) <input type="checkbox"/> Turnkey III <input checked="" type="checkbox"/> Section 32 of the USHA of 1937 (effective 10/1/99)
3. Application status: (select one) <input type="checkbox"/> Approved; included in the PHA’s Homeownership Plan/Program <input type="checkbox"/> Submitted, pending approval <input checked="" type="checkbox"/> Planned application
4. Date Homeownership Plan/Program approved, submitted, or planned for submission: (09/30/2006)
5. Number of units affected: 30
6. Coverage of action: (select one) <input checked="" type="checkbox"/> Part of the development <input type="checkbox"/> Total development

B. Section 8 Tenant Based Assistance

1. Yes No: Does the PHA plan to administer a Section 8 Homeownership program pursuant to Section 8(y) of the U.S.H.A. of 1937, as implemented by 24 CFR part 982 ? (If “No”, skip to component 12; if “yes”, describe each program using the table below (copy and complete questions for each program identified), unless the PHA is eligible to complete a streamlined submission due to high performer status. **High performing PHAs** may skip to component 12.)

1. Program Description:

The Indianapolis Housing Agency (IHA) has created a Housing Choice Voucher Homeownership Program entitled A H.O.M.E. For You, (Homeownership Opportunities Made Easier) that allows families and individuals participating in the Section 8 housing choice voucher program an opportunity to purchase a home utilizing their voucher assistance to assist with payment of home mortgages. Participation in the program is voluntary but certain eligibility criteria must be met, including but not limited to the following: minimum income guidelines; pre-purchase counseling; first –time homebuyer training and close pre-and post purchase communication with the homeownership program staff.

a. Size of Program

- Yes No: Will the PHA limit the number of families participating in the section 8 homeownership option?

If the answer to the question above was yes, which statement best describes the number of participants? (select one)

- 25 or fewer participants
 26 - 50 participants
 51 to 100 participants
 more than 100 participants

b. PHA-established eligibility criteria

- Yes No: Will the PHA’s program have eligibility criteria for participation in its Section 8 Homeownership Option program in addition to HUD criteria?

If yes, list criteria below:

Participants must be enrolled or willing to be enrolled in a Family Sufficiency Program

12. PHA Community Service and Self-sufficiency Programs

[24 CFR Part 903.7 9 (I)]

Exemptions from Component 12: High performing and small PHAs are not required to complete this component. Section 8-Only PHAs are not required to complete sub-component C.

A. PHA Coordination with the Welfare (TANF) Agency

1. Cooperative agreements:

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

If yes, what was the date that agreement was signed?

07/28/98— Updated MOA discussions are commencing

2. Other coordination efforts between the PHA and TANF agency (select all that apply)

- Client referrals
- Information sharing regarding mutual clients (for rent determinations and otherwise)
- Coordinate the provision of specific social and self-sufficiency services and programs to eligible families
- Jointly administer programs
- Partner to administer a HUD Welfare-to-Work voucher program
- Joint administration of other demonstration program
- Other:

B. Services and programs offered to residents and participants

(1) General

a. Self-Sufficiency Policies

Which, if any of the following discretionary policies will the PHA employ to enhance the economic and social self-sufficiency of assisted families in the following areas? (select all that apply)

- Public housing rent determination policies
- Public housing admissions policies
- Section 8 admissions policies
- Preference in admission to section 8 for certain public housing families
- Preferences for families working or engaging in training or education programs for non-housing programs operated or coordinated by the PHA
- Preference/eligibility for public housing homeownership option participation
- Preference/eligibility for section 8 homeownership option participation
- Other policies:

Exempt early lease termination penalty for residents completing and moving into homeownership programs

b. Economic and Social self-sufficiency programs

Yes No: Does the PHA coordinate, promote or provide any programs to enhance the economic and social self-sufficiency of residents? (If “yes”, complete the following table; if “no” skip to sub-component 2, Family Self Sufficiency Programs. The position of the table may be altered to facilitate its use.)

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
Children and Family Services	1500	Parent Permission	Door to Door Flyer	Both
Senior & Disabled	600	Self-identify/Briefing	Door to Door Flyer	Both
Individual and Family Intervention	720	Self-identify/Briefing	Door to Door Flyer	Both
Family Self-Sufficiency	1000	Specific Criteria/Referral	Door to Door/Briefing Flyer/FIC/Rectification	Both
Resident Leadership Dev.	150	Self-identify	Door to Door Flyer	Both
Transportation	100	Grant participant	Door to Door Flyer	Both
Other (Family/Community)	10,000	Outreach	Door to Door Flyer	Both

(2) Family Self Sufficiency program/s

a. Participation Description

Family Self Sufficiency (FSS) Participation		
Program	Required Number of Participants (start of FY 2005 Estimate)	Actual Number of Participants (As of: 08/10/05)
Public Housing	198	115
Section 8	831 as of 1/05	671

b. Yes No: If the PHA is not maintaining the minimum program size required by HUD, does the most recent FSS Action Plan address the steps

the PHA plans to take to achieve at least the minimum program size?

Mandatory FSS commitment phased in over a 5- year period (2005-2009)

If no, list steps the PHA will take below:

C. Welfare Benefit Reductions

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

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

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

13. PHA Safety and Crime Prevention Measures

[24 CFR Part 903.7 9 (m)]

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

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

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

- High incidence of violent and/or drug-related crime in some or all of the PHA's developments
- High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to the PHA's developments
- Residents fearful for their safety and/or the safety of their children

- Observed lower-level crime, vandalism and/or graffiti
- People on waiting list unwilling to move into one or more developments due to perceived and/or actual levels of violent and/or drug-related crime
- Other (describe below)

2. What information or data did the PHA used to determine the need for PHA actions to improve safety of residents (select all that apply).

- Safety and security survey of residents
- Analysis of crime statistics over time for crimes committed “in and around” public housing authority
- Analysis of cost trends over time for repair of vandalism and removal of graffiti
- Resident reports
- PHA employee reports
- Police reports
- Demonstrable, quantifiable success with previous or ongoing anticrime/anti drug programs
- Other (describe below)

3. Which developments are most affected? **Blackburn, Twin Hills, and Laurelwood**

B. Crime and Drug Prevention activities the PHA has undertaken or plans to undertake in the next PHA fiscal year

1. List the crime prevention activities the PHA has undertaken or plans to undertake: (select all that apply)

- Contracting with outside and/or resident organizations for the provision of crime-and/or drug-prevention activities
- Crime Prevention Through Environmental Design
- Activities targeted to at-risk youth, adults, or seniors
- Volunteer Resident Patrol/Block Watchers Program
- Other:
Securing in-kind commitments of local organizations for the provision of crime and/or drug early intervention and prevention activities (e.g. Peer Support, Life Skills Development, PRIDE, Peace Rallies, After School, Career Development Programs, Homebased Counseling, In and Out patient Treatment).

2. Which developments are most affected? **Blackburn, Twin Hills, and Laurelwood**

C. Coordination between PHA and the police

1. Describe the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities: (select all that apply)

- Police involvement in development, implementation, and/or ongoing evaluation of drug-elimination plan
- Police provide crime data to housing authority staff for analysis and action
- Police have established a physical presence on housing authority property (e.g., community policing office, officer in residence)
- Police regularly testify in and otherwise support eviction cases
- Police regularly meet with the PHA management and residents
- Agreement between PHA and local law enforcement agency for provision of above-baseline law enforcement services
- Other activities (list below)

2. Which developments are most affected? **Blackburn, Twin Hills, and Laurelwood**

D. Additional information as required by PHDEP/PHDEP Plan

PHAs eligible for FY 2005 PHDEP funds must provide a PHDEP Plan meeting specified requirements prior to receipt of PHDEP funds.

- Yes No: Is the PHA eligible to participate in the PHDEP in the fiscal year covered by this PHA Plan?
- Yes No: Has the PHA included the PHDEP Plan for FY 2005 in this PHA Plan?
- Yes No: This PHDEP Plan is an Attachment. (Attachment Filename: ____)

14. RESERVED FOR PET POLICY

[24 CFR Part 903.7 9 (n)]

Pet Policy Attachment L

15. Civil Rights Certifications

[24 CFR Part 903.7 9 (o)]

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

PHA Certifications of Compliance will be submitted to local HUD office

16. Fiscal Audit

[24 CFR Part 903.7 9 (p)]

1. Yes No: Is the PHA required to have an audit conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h))?
(If no, skip to component 17.)
2. Yes No: Was the most recent fiscal audit submitted to HUD?
3. Yes No: Were there any findings as the result of that audit?
4. Yes No: If there were any findings, do any remain unresolved?
If yes, how many unresolved findings remain? _____
5. Yes No: Have responses to any unresolved findings been submitted to HUD?
If not, when are they due (state below)?

17. PHA Asset Management

[24 CFR Part 903.7 9 (q)]

Exemptions from component 17: Section 8 Only PHAs are not required to complete this component. High performing and small PHAs are not required to complete this component.

1. Yes No: Is the PHA engaging in any activities that will contribute to the long-term asset management of its public housing stock, including how the Agency will plan for long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs that have **not** been addressed elsewhere in this PHA Plan?
2. What types of asset management activities will the PHA undertake? (select all that apply)
 - Not applicable
 - Private management
 - Development-based accounting
 - Comprehensive stock assessment
 - Other: **Decentralization Site-Based Management**
3. Yes No: Has the PHA included descriptions of asset management activities in the **optional** Public Housing Asset Management Table?

18. Other Information

[24 CFR Part 903.7 9 (r)]

A. Resident Advisory Board Recommendations

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

2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)
 Attached at Attachment (File name) **Resident Comments- Attachment M**
 Provided below:

3. In what manner did the PHA address those comments? (select all that apply)
 Considered comments, but determined that no changes to the PHA Plan were necessary.
 The PHA changed portions of the PHA Plan in response to comments
List changes below:
IHA will consider taking initial steps in researching HUD programs that allow for public housing units to be converted into homeownership opportunities
 Other:

B. Description of Election process for Residents on the PHA Board

1. Yes No: Does the PHA meet the exemption criteria provided section 2(b)(2) of the U.S. Housing Act of 1937? (If no, continue to question 2; if yes, skip to sub-component C.)

2. Yes No: Was the resident who serves on the PHA Board elected by the residents? (If yes, continue to question 3; if no, skip to sub-component C.)
City Ordinance requires two (2) residents to serve on the IHA Board of Commissioners

3. Description of Resident Election Process

- a. Nomination of candidates for place on the ballot: (select all that apply)
 Candidates were nominated by resident and assisted family organizations
 Candidates could be nominated by any adult recipient of PHA assistance

- Self-nomination: Candidates registered with the PHA and requested a place on ballot
- Other: (describe)

b. Eligible candidates: (select one)

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

c. Eligible voters: (select all that apply)

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

C. Statement of Consistency with the Consolidated Plan

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

1. Consolidated Plan jurisdiction: **Indianapolis-Marion County, Indiana**

2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)

- The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
- The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
- Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan.
- Other: (list below)

4. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: **The Consolidated Plan incorporates the PHA's activities to further define and serve the housing needs of families in the jurisdiction**

D. Other Information Required by HUD

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

Attachments

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

Attachment A

Admissions Policy for Deconcentration

DECONCENTRATION RULE

1. The objective of the Deconcentration Rule for public housing units is to ensure that families are housed in a manner that will prevent a concentration of poverty families and/or a concentration of higher income families in any one development. The specific objective of the housing authority is to house no less than 40 percent of its public housing inventory with families that have income at or below 30% of the area median income by public housing development. Also the housing authority will take action to ensure that no individual has a concentration of higher income families in one or more of the developments. To ensure that the housing authority does not concentrate families with higher income levels, it is the goal of the housing authority not to house more than 60% of its units in any one development with families whose income exceeds 30% of the area medium income. The housing authority will track the status of family income by, development on a monthly basis by utilizing income reports generated by the housing authority's computer system.
2. To accomplish the deconcentration goals, the housing authority will take the following actions:
 - A. At the beginning of each housing authority fiscal year, the housing authority will establish a goal for housing 40% of its new admissions with families whose incomes are at or below the area median income. The annual goal will be calculated by taking 40% of the total number of move-ins from the previous housing authority fiscal year.
 - B. To accomplish the goals of:
 1. Housing not less than 40% of its public housing inventory on an annual basis with families that have incomes at or below 30% of the area median income, and
 2. Not housing families with incomes that exceed 30% of the area median income development that have 60% or more of the total household living in the development with incomes that exceed 30% of the area median income, the housing authority's Tenant Selection and Assignment Plan, which is a part of this policy, provides for skipping families on the waiting list to accomplish these goals.

Attachment B

FY 2006 Capital Fund Program Annual Statement

PHA Plan Table Library

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

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

Capital Fund Grant Number IN36P01750106 FFY of Grant Approval: (08/2006)

Original Annual Statement

Line No.	Summary by Development Account	Total Estimated Cost
1	Total Non-CGP Funds	
2	1406 Operations	286,458
3	1408 Management Improvements	300,000
4	1410 Administration	286,458
5	1411 Audit	
6	1415 Liquidated Damages	
7	1430 Fees and Costs	30,000
8	1440 Site Acquisition	
9	1450 Site Improvement	
10	1460 Dwelling Structures	1,498,334
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	1498 Asset Modernization Loan Payment	463,334
19	1502 Contingency	
20	Amount of Annual Grant (Sum of lines 2-19)	2,864,584
21	Amount of line 20 Related to LBP Activities	
22	Amount of line 20 Related to Section 504 Compliance	
23	Amount of line 20 Related to Security	
24	Amount of line 20 Related to Energy Conservation Measures	

Annual Statement
Capital Fund Program (CFP) Part II: Supporting Table

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost
HA	Site-Based Design	1430	\$30,000
HA	Dwelling Improvements	1460	\$1,498,334
HA	Agency Software Upgrade	1408	\$300,000
HA	Lease Payment	1501	\$463,334

Annual Statement

Capital Fund Program (CFP) Part III: Implementation Schedule

Development Number/Name HA-Wide Activities	All Funds Obligated (Quarter Ending Date)	All Funds Expended (Quarter Ending Date)
HA (All activities)	Second Quarter 2007	Fourth Quarter 2007

Attachment C

Operating Budget (HUD form-52723)

**Operating Fund
Calculation of Operating Subsidy
PHA-Owned Rental Housing**

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

OMB Approval No. 2577-0029 (exp. 10/31/2004)

Section 1

Name and Address of Public Housing Agency Indianapolis Housing Agency 1919 North Meridian Street Indianapolis, IN 46202					b) Budget Submission to HUD required <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
					c) Type of Submission <input checked="" type="checkbox"/> Original <input type="checkbox"/> Revision No.	
d) No. of HA Units 1,738	e) Unit Months Available (UMAs) 20,856	f) Subject FYE 12/31/2005	g) ACC Number C-970	h) Operating Fund Project Number I N 0 1 7 0 0 7 0 5 D		i) DUNS Number 110286247

Section 2

Line No.	Description	Requested by PHA (PUM)	HUD Modifications (PUM)
Part A. Allowable Expenses and Additions			
01	Previous allowable expense level (Part A, Line 08 of form HUD-52723 for previous year)	250.07	
02	Part A, Line 01 multiplied by .005	1.25	
03	Delta from form HUD-52720-B, if applicable (see instructions)		
04	"Requested" year units from latest form HUD-52720-A (see instructions)	1,738	
05	Add-ons to allowable expense level from previous fiscal year (see instructions)		
06	Total of Part A, Lines 01, 02, 03 and 05	251.32	
07	Inflation factor	1.025	
08	Revised allowable expense level (AEL) (Part A, Line 06 times Line 07)	257.60	
09	Transition Funding		
10	Increase to AEL		
11	Allowable utilities expense level from form HUD-52722-A	94.66	
12	Actual PUM cost of Independent Audit (IA) (Through FYE 2002)	1.74	
13	Costs attributable to deprogrammed units		
	Total Allowable Expenses and Additions (Sum of Part A, Lines 08 thru 13)	354.00	
Part B. Dwelling Rental Income			
01	Total rent roll (as of 7/1/2004)	\$ 243,508	
02	Number of occupied units as of rent roll date	1,658	
03	Average monthly dwelling rental charge per unit for current budget year (Part B, Line 01 ÷ Line 02)	146.86	
04	Average monthly dwelling rental charge per unit for prior budget year	144.93	
05	Average monthly dwelling rental charge per unit for budget year 2 years ago	142.65	
06	Three-year average monthly dwelling rental charge per unit ((Part B, Line 03+Line 04+Line 05) ÷ 3)	144.81	
07	50/50 Income split ((Part B, Line 03 + Line 06) ÷ 2)	145.84	
08	Average monthly dwelling rental charge per unit (lesser of Part B, Line 03 or Line 07)	145.84	
09	Rental income adjustment factor	1.03	1.
10	Projected average monthly dwelling rental charge per unit (Part B, Line 08 times Line 09)	150.21	
11	Projected occupancy percentage from form HUD-52728	95%	%
12	Projected average monthly dwelling rental income per unit (Part B, Line 10 times Line 11)	142.70	
Part C. Non-dwelling Income			
01	Other income	0.52	
02	Total operating receipts (Part B, Line 12 plus Part C, Line 01)	143.22	
03	PUM deficit or (Income) (Part A, Line 14 minus Part C, Line 02)	210.78	
		Requested by PHA (Whole dollars)	HUD Modifications (Whole dollars)
04	Deficit or (Income) before add-ons (Part C, Line 03 times Section 1, e)	4,396,028	

Project Number:

IN01700705D

Line No.	Description	Requested by PHA (Whole Dollars)	HUD Modifications (Whole Dollars)
Part H. Calculation of Adjustments for Subject Fiscal Year			
This part is to be completed only after the subject fiscal year has ended			
1	Indicate the types of adjustments that have been reflected on this form: <input type="checkbox"/> Utility Adjustment <input type="checkbox"/> HUD discretionary adjustment (Specify under Section 3)		
02	Utility adjustment from form HUD-52722-B		
03	Deficit or (Income) after adjustments (total of Part E, Line 01 and Part H, Line 02)		
04	Operating subsidy eligibility after year-end adjustments (greater of Part E, Line 02 or Part H, Line 03)		
05	Part E, Line 03 of latest form HUD-52723 approved during subject FY (Do not use Part E, Line 03 of this revision)		
06	Net adjustments for subject fiscal year (Part H, Line 04 minus Part H, Line 05)		
07	Utility adjustment (enter same amount as Part H, Line 02)		
08	Total HUD discretionary adjustments (Part H, Line 06 minus Line 07)		
09	Unfunded portion of utility adjustment due to proration		
10	Unfunded portion of HUD discretionary adjustment due to proration		
11	Prorated utility adjustment (Part H, Line 07 plus Line 09)		
12	Prorated HUD discretionary adjustment (Part H, Line 08 plus Line 10)		

Section 3

Remarks (provide part and line numbers)

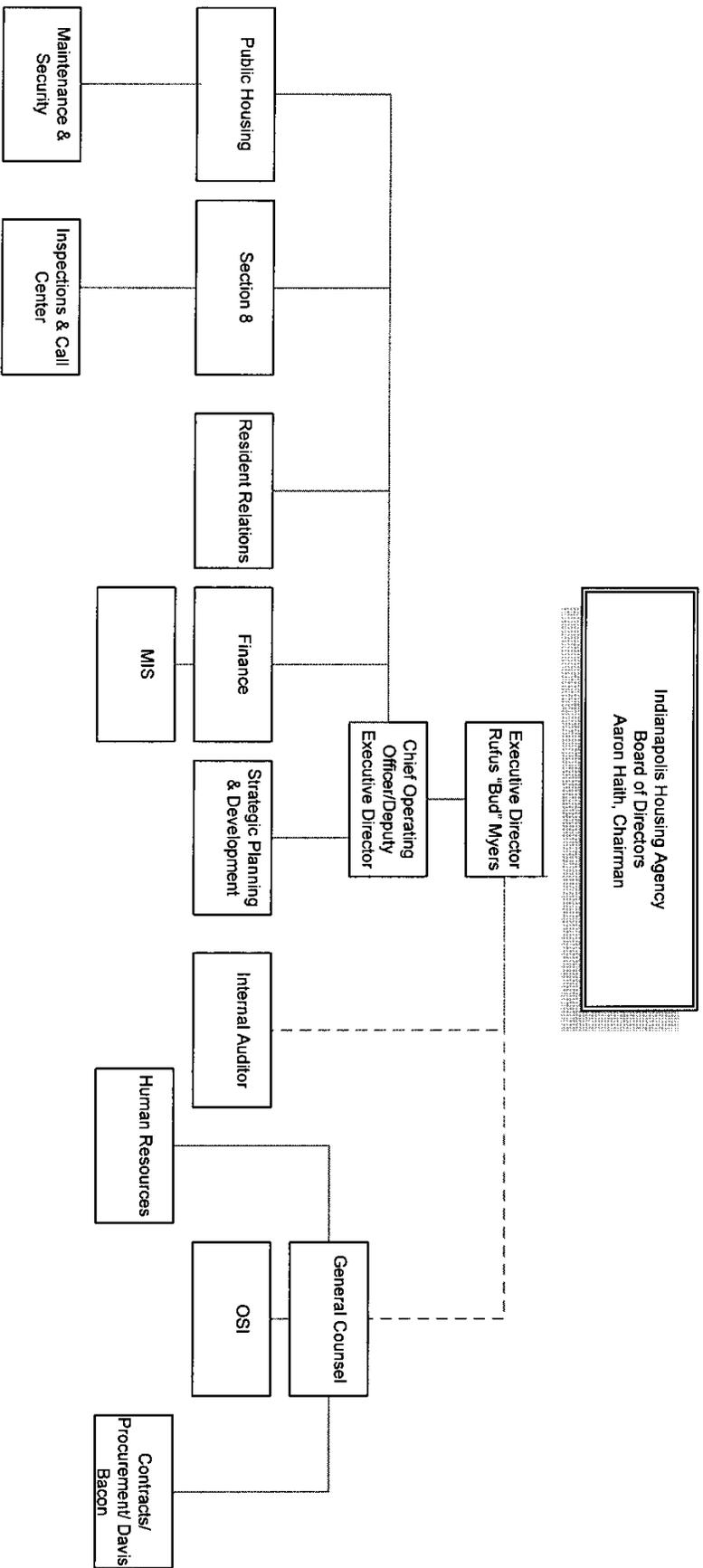
Part F, line 1:
2001 Utilities: 239,425
2002 Utilities: (51,798)
2003 Utilities: 152,912
Net 340,539

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.
Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Signature of Authorized HA Representative & Date: Rufus Bud Myers X <i>RBM</i> 10/13/04	Signature of Authorized Field Office Representative & Date: X
---	--

Attachment D

Management Organizational Chart



Footnote: General Counsel and Internal Auditor report to the Board of Directors and the Executive Director

Attachment E

Capital Fund Program 5- Year Action Plan

Capital Fund Program 5-Year Action Plan

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

CFP 5-Year Action Plan			
<input type="checkbox"/> Original statement <input checked="" type="checkbox"/> Revised statement			
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development
	PHA – WIDE		
Description of Needed Physical Improvements or Management Improvements			Estimated Cost
	Resident Relations		\$25,000.00
	Software		\$25,000.00
	Training		\$25,000.00
	Computer Hardware		\$25,000.00
	Tractor		\$1,900.00
	Upgrade Site Leasing Offices		\$80,000.00
	Small Equipment Purchase		\$90,000.00
	Software Windows Upgrade (CCS)		\$300,000.00
Total estimated cost over next 5 years			\$571,900.00

Capital Fund Program 5-Year Action Plan

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

CFP 5-Year Action Plan			
<input type="checkbox"/> Original statement <input checked="" type="checkbox"/> Revised statement			
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development
020	John J. Barton Annex	0	0 %
Description of Needed Physical Improvements or Management Improvements			Estimated Cost
			Planned Start Date (HA Fiscal Year)
Replace Monitoring System			\$15,000.00
Replace Trash Compactor			\$25,000.00
Repair Roof Parapets			\$9,000.00
Outside Windows			\$7,500.00
Caulk Exterior of Building			\$25,000.00
Repair Sidewalks			\$10,000.00
Power-wash & Seal Exterior			\$60,000.00
Replace Appliances			\$80,000.00
Total estimated cost over next 5 years			\$231,500.00

Capital Fund Program 5-Year Action Plan

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

CFP 5-Year Action Plan			
<input type="checkbox"/> Original statement <input checked="" type="checkbox"/> Revised statement			
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development
022	Richard Lugar Tower	6	2.8 %
Description of Needed Physical Improvements or Management Improvements			Estimated Cost
			Planned Start Date (HA Fiscal Year)
Restore Deprogrammed Units			\$15,000.00
Replace Intercom System			\$17,000.00
Expand Management Office			\$20,000.00
Illuminate Sign			\$3,000.00
Expand Resident Council Office			\$5,000.00
Replace Appliances			\$110,000.00
Landscaping			\$10,000.00
Temp. Plumbing Repairs			\$50,000.00
Install Heat Sensor Detectors			\$135,000.00
Upgrade Plumbing			\$2,000,000.00
Total estimated cost over next 5 years			\$2,365,000.00

Capital Fund Program 5-Year Action Plan

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

CFP 5-Year Action Plan			
<input type="checkbox"/> Original statement <input checked="" type="checkbox"/> Revised statement			
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development
027	Indiana Avenue Apartments	3	2.9%
Description of Needed Physical Improvements or Management Improvements			Estimated Cost
Roof Repair			\$25,000.00
Landscaping			\$10,000.00
Tuckpointing			\$20,000.00
Repair Windows			\$40,000.00
Sidewalk & Parking Lot Repair			\$50,000.00
New Ceiling Tiles			\$20,000.00
New Kitchen Cabinets			\$200,000.00
Roof Replacement			\$100,000.00
Upgrade HVAC Systems			\$140,000.00
Total estimated cost over next 5 years			\$605,000.00

Capital Fund Program 5-Year Action Plan

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

CFP 5-Year Action Plan			
<input type="checkbox"/> Original statement <input checked="" type="checkbox"/> Revised statement			
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development
013	Blackburn Terrace Apts.	13	5.4 %
Description of Needed Physical Improvements or Management Improvements			Estimated Cost
Community Center ADA Access			\$50,000.00
Community Center ADA Restrooms			\$10,000.00
Repair Windows			\$50,000.00
Repair Masonry			\$55,000.00
Replace Appliances			\$130,000.00
Dumpster Enclosures			\$5,000.00
Asphalt Repair			\$5,000.00
Replace Sub-floors in Bathrooms			\$300,000.00
Replace Soffits (porches)			\$250,000.00
Clean HVAC Ducts & Vents			\$50,000.00
Replace Gutters & Downspouts			\$750,000.00
Replace Storm Doors			\$25,000.00
Replace Roofs			\$500,000.00
Replace Plumbing Fixtures			\$1,000,000.00
Total estimated cost over next 5 years			\$3,180,000.00

Capital Fund Program 5-Year Action Plan

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

CFP 5-Year Action Plan			
<input type="checkbox"/> Original statement <input checked="" type="checkbox"/> Revised statement			
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development
018	Beechwood Garden Apts.	4	2.7 %
Description of Needed Physical Improvements or Management Improvements			Planned Start Date (HA Fiscal Year)
Storage Outbuilding			2005
Street Directional Signage			2005
Paint & Repair Curbs			2005
Repair uninhabitable units			2005
Replace Appliances			2006
New Furnaces & Air Conditioning			2007
Replace Poly-pipe			2007
New Refrigerators			2009
Total estimated cost over next 5 years			\$792,200.00

Capital Fund Program 5-Year Action Plan

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

CFP 5-Year Action Plan			
<input type="checkbox"/> Original statement <input checked="" type="checkbox"/> Revised statement			
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development
017	Hawthorne Place Apartments	9	5.5 %
Description of Needed Physical Improvements or Management Improvements			Estimated Cost
Planned Start Date (HA Fiscal Year)			
Paint Community Center Interior			\$2,000.00
Porch Painting			\$10,000.00
Asphalt & Concrete Repair			\$150,000.00
Install Central Mailboxes			\$1,200.00
Replace Windows			\$60,000.00
Replace Appliances			\$90,000.00
Replace Dumpster Enclosures			\$10,000.00
Replace Range Hoods			\$20,000.00
Replace Water Heaters			\$35,000.00
Roof Work			\$25,000.00
Privacy Fencing			\$8,000.00
Improve Parking Lot Drainage			\$26,500.00
Total estimated cost over next 5 years			\$437,700.00

Capital Fund Program 5-Year Action Plan

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

CFP 5-Year Action Plan			
<input type="checkbox"/> Original statement <input checked="" type="checkbox"/> Revised statement			
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development
021	Rowney Terrace Apts.	7	7.4 %
Description of Needed Physical Improvements or Management Improvements			Estimated Cost
Landscaping			\$20,000.00
Office Upgrades			\$15,000.00
Replace Appliances			\$40,000.00
Gutter and Downspout Repair			\$15,000.00
Water Shut-off & Sewer Clean			\$20,000.00
Wrought Iron Fencing			\$10,000.00
Renovate Community Center			\$10,000.00
Remove Graffiti			\$10,000.00
Bathroom Renovations			\$57,000.00
New Furnaces & Air Conditioning			\$230,000.00
Total estimated cost over next 5 years			\$157,000.00

Capital Fund Program 5-Year Action Plan

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

CFP 5-Year Action Plan			
<input type="checkbox"/> Original statement <input checked="" type="checkbox"/> Revised statement			
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development
009, 029 015, 035	Concord Village Eaglcreek Community	0	.0 %
Description of Needed Physical Improvements or Management Improvements		Estimated Cost	Planned Start Date (HA Fiscal Year)
Paint Wood Trim		\$5,000.00	2005
Move A.C. Compressor		\$3,000.00	2005
Replace Dead Landscaping		\$2,000.00	2005
Erosion Control/Walnut St.		\$2,000.00	2005
Paint & Repair Handrails		\$2,500.00	2005
Siding Repair		\$800.00	2005
Roof Repair		\$1,000.00	2005
Driveway Repair/Haugh		\$1,400.00	2005
Paint Community Center Interior		\$5,000.00	2006
Concrete/Sidewalk Repair		\$9,000.00	2006
Replace Appliances		\$30,000.00	2007
Total estimated cost over next 5 years		\$31,700.00	

Attachment F

Resident Advisory Board Membership

BOARD OF DIRECTORS
INDIANAPOLIS CITIZENS EMPOWERMENT FOUNDATION

[I.C.E.F.]

**Beverly Barnes
Gardens**

President/Beechwood

Mary R. Turner
Indiana Avenue**

Vice- President

Linda D. Curtis

Secretary/Blackburn Terrace

Janet Weddington

Treasurer/Lugar Towers

**Evelyn Cook
Hawthorne Pl.**

Sergeant- at- Arms

Sandra Bailey**

Laurelwood Apartments

Chester Carpenter

Indiana Avenue

Shantay Fisher

Rowney Terrace

Donna Harper

Concord/Eagle Creek

Joyce Miller

Barton Tower

Kevin Perry

Barton Annex

Debra Scott

Twin Hills

Johnette Chandler

Rowney Terrace/(Exec. Dir.)

** (IHA's Board of Commissioners resident representation/ Elected and appointed by I.C.E.F. for a one-year term)

Attachment G

2005-2009 5- Year Goals/Achievement Summary

2005-2009 Five Year Goals/Achievement Summary

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

PHA Goal: Expand the supply of assisted housing	5 Year Plan	2005 Actual	2006	2007	2008	2009
Apply for additional rental vouchers	Increase population by 5% annually	Zero per HUD				
Reduce public housing vacancies	97% adjusted occupancy rate	97%				
Leverage private or other public funds to create additional housing opportunities	Leverage additional funds	3.8 million				
Acquire or build units or developments	Minimum of (2) development sites	1-HOPE VI				
PHA Goal: Improve the quality of assisted housing						
PHA Goal: Improve the quality of assisted housing	5 Year Plan	2005 Actual	2006	2007	2008	2009
Improve public housing management (PHAS) scores	Increase score to 90 points	2006 per HUD				
Improve voucher management (SEMAP) scores	Increase utilization rate to 98%	2006 per HUD				
Increase customer satisfaction (RASS)	Achieve 90% by year 2009	2006 per HUD				
Improve specific management functions: public housing finance; voucher unit inspections	Improve Management functions	Setting standards PH/S8				
Renovate or modernize public housing units	100% modernization over 5 years (20%/year)	0				
Demolish or dispose of obsolete public housing	Demolish or dispose PH	0				
Provide replacement public housing	2 site developments over 5 years	0				
Provide replacement vouchers	50 replacement vouchers over 5 years	Zero per HUD				
PHA Goal: Increase assisted housing choices						
PHA Goal: Increase assisted housing choices	5 Year Plan	2005 Actual	2006	2007	2008	2009
Provide voucher mobility counseling	125 clients served over 5 year period	168				
Conduct outreach efforts to potential voucher landlords	Landlord outreach effort	Updated website				
Implement voucher homeownership program	100 clients over a 5 year period	57				
Implement public housing or other homeownership programs	ROSS program	4				
Implement public housing site-based waiting lists (IHA communities)	Utilizing site-based waiting list (2002)	Complete				
Convert public housing to vouchers	Public Housing conversion	Zero per HUD				
Other: Projects will be designed to promote opportunities that increase assisted housing choices such as the current project-based section 8 voucher program	10% maximum of voucher utilization	84				

2005-2009 Five-Year Goals/ Achievement Summary (cont'd)

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

PHA Goal: Provide an improved living environment	5 Year Plan	2005 Actual	2006	2007	2008	2009
Implement measures to de-concentrate poverty by bringing in higher income public housing households into lower income developments	Mandatory FSS for PH families	1-HOPE VI				
Implement measures to promote income mixing in public housing by assuring access for lower income families into higher income developments	Mixed finance projects	1-HOPE VI				
Implement public housing security improvements	Security improvements	All senior communities				
Designate developments or buildings for particular resident groups	Designated housing	0				
Other: Implement energy savings improvements and asset modernization at various family sites, and develop IDA's (Individual Development Accounts)	Various improvements	IDA protocol				

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

PHA Goal: Promote self-sufficiency and asset development of families	5 Year Plan	2005 Actual	2006	2007	2008	2009
Increase the number and percentage of employed persons in assisted households	FSS employed	207				
Provide or attract supportive services to improve assistance recipients' employability	Supported services	100				
Provide or attract supportive services to increase independence for elderly or families with disabilities	Supported services	14				
Other: Comply with HUD's Mandatory Earned Income Disallowance (MEID) for public housing residents	MEID	Complying				

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

PHA Goal: Ensure equal opportunity and affirmatively further fair housing	5 Year Plan	2005 Actual	2006	2007	2008	2009
Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability	Undertake affirmative measures	Promotional material				
Undertake affirmative measures to provide a suitable environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability	Undertake affirmative measures	Continue Partnering				
Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required	Project base vouchers, 15-20 over the next five years	0				
Other: Increase MCCHO's (IHA program) service level as an intake and referral intermediary for individuals and families experiencing discrimination	Increase service levels	2				



Attachment H

Housing Choice Voucher
Administrative Plan

October 1, 2005

Table of Contents

Introduction	Page 3
Overview	Page 3
Selection for the Waitlist	Page 7
Issuing and Denying Voucher	Page 8-9
Special Funding	Page 9
Occupancy Rules	Page 10 11
Owner Outreach	Page 12
Discrimination Complaints	Page 13
Information to Owners	Page 14
Disapproval of Owners	Page 15
Subsidy Standards	Page 16
Absence from Dwelling Unit	Page 17 18
Family Break-Up	Page 19
Informal Reviews	Page 20
Informal Hearings	Page 21
Payment Standards	Page 22
Minimum Rent	Page 22
Rent Reasonableness	Page 23
Special Housing Types	Page 24
Family and Owner Debts to the IHA	Page 25
Interim Reexaminations	Page 26
Restrictions on the Number of Moves	Page 27
Portability Procedures	Page 28 29
Administrative Fee Reserve	Page 30
Housing Quality Standards	Page 31 32
Screening for Behavior and Suitability	Page 33
Homeownership Addendum	Page 34 47
Project Based Assistance Addendum	Page 48 49
FSS Plan	Page 50 61

Overview of the Program and Plan (adopted from the Nan McKay Administrative Plan Model)
(24 CFR part 5; 24 CFR part 8; 24 CFR part 982)

Introduction

The Indianapolis Housing Agency (IHA) receives its funding for the Housing Choice Voucher (HCV) program from the U.S Department of Housing and Urban Development (HUD). The IHA is not a federal department of agency. The housing agency is a government or public body, created tank authorized by the state to develop and operate housing programs for low-income families. The IHA enters into an Annual Contributions Contract with HUD to administer the program requirements and notices and must establish policy and procedures to clarify federal requirements and to ensure consistency in program operation

Overview

I. Organization and Structure of the IHA

The Section 8 tenant-based Housing Choice Voucher (HCV) assistance program is funded by the federal government and administered by the Indianapolis Housing Agency (IHA) for the jurisdiction of the City of Indianapolis/ County of Marion.

The officials of the IHA are known as commissioners or, collectively, as the board of commissioners. Commissioners are appointed in accordance with state housing law and generally serve in the same capacity as the directors of a corporation, establishing policies under which the IHA conducts business, ensuring that policies are followed by the IHA staff and ensuring that he IHA is successful in its mission. The board is responsible for preserving and expanding the agency's continued viability.

Formal actions of the IHA are taken through written resolutions, adopted by the board of commissioners and entered into official records of the IHA.

The principal staff member of the IHA is the executive director (E.D.), hired and appointed by the board of commissioners. The executive director is directly responsible for carrying out the policies established by the commissioners and is delegated the responsibility for hiring, training and supervising the remainder of the IHA's staff in order to manage the day-to-day operations of the IHA to ensure compliance with federal and state laws and directives for the programs managed. In addition, the executive director's duties include budgeting and financial planning for the agency.

II. IHA Mission

Our mission is to be a top-performing agency that: provides quality and affordable housing; contributes to safe communities; encourages individual and family self-sufficiency; and affirmatively promotes fair housing.

III. IHA Programs

The IHA's administrative plan is applicable to the operation of the Housing Choice Voucher program.

IV. Overview and History of the Housing Choice Voucher Program

The United States Housing Act of 1937 (the “act”) is responsible for the birth of federal housing program initiatives. The Act was intended to provide financial assistance to states and cities for public works projects, slum clearance and the development of affordable housing developments for low-income residents.

The Housing and Community Development (HCD) Act of 1974 created a new federally assisted housing program—Section 8 Existing program (also known as the Section 8 Certificate program). The HCD Act represented a significant shift in federal housing to privately owned rental housing.

Under the Certificate program federal housing assistance payments were made directly to private owners of rental housing, where this housing was made available to lower-income families. Eligible families were able to select housing in the private rental market. Assuming that the housing met certain basic physical standards of quality (“housing quality standards”) and was within certain HUD-established rent limitations (“fair market rents”), the family would be able to receive rental assistance in the housing unit. Family contributions to rent was generally set at 30 percent of the family’s adjusted income, with the remainder of the rent paid by the program.

Another unique feature of the Certificate program was that the rental assistance remained with the eligible family, if the family chose to move to another privately owned rental unit that met program requirements (in contrast to public housing where the rental assistance remains with the unit, should the family decide to move). Consequently, the Certificate program was characterized as tenant-based assistance, rather than unit-based assistance.

The Housing and Community Development (HCD) Act of 1987 authorized a new version of tenant-based assistance—the Section 8 Voucher program. The Voucher program was very similar to the Certificate program in that eligible families were able to select housing in the private rental market and receive assistance in that housing unit.

However, the Voucher program permitted families more options in housing selection. Rental housing still had to meet basic housing standards, but there were no fair market rent limitation on rent. In addition, family contribution to rent was not set at a limit of 30 percent of adjusted income. Consequently, depending on the actual rental cost of the unit selected, a family might pay more or less than 30 percent of their adjusted income for rent.

From 1987 through 1999, public housing agencies managed both the Certificate and Voucher tenant-based assistance programs, with separate rules and requirements for each. From 1994 through 1998, HUD published a series of new rules, known as “conforming rules”, to more closely combine and align the two similar housing programs, the extent permitted by the law.

In 1998, the Quality Housing and Work Responsibility Act (QHWRA)—also known as Public Housing Reform Act—was signed into law. QHWRA eliminated all statutory differences between the Certificate and Voucher tenant-based programs and required that the two programs be merged into a single tenant-based assistance program, known as the Housing Choice Voucher (HCV) program.

The HCV program was modeled closely in the pre-merger Voucher program. However, unlike the pre-merger Voucher program, the HCV program requires an assisted family to pay at least 30 percent of adjusted income for rent.

The transition of assistance from the Certificate and Voucher programs to the new HCV program began in October 1999. By October 2001, all families receiving tenant-based assistance were converted to the HCV program.

V. Program Basics

The purpose of the HCV program is to provide rental assistance to eligible families. The rules and regulations of the HCV program are determined by the U.S. Department of Housing and Urban Development. The IHA is afforded choices in the operation of the program, which are included in the IHA’s administrative plan, a document approved by the board of commissioners of the IHA.

The HCV program offers mobility to eligible families because they may search for suitable housing anywhere in the IHA’s jurisdiction and may also be eligible to move under portability to other IHA’s jurisdiction.

When a family is determined to be eligible for the program and funding is available, the IHA issues the family a housing voucher. When the family finds a suitable housing unit and funding is available, the IHA will enter into a contract with the owner and the family will enter into a lease with the owner. Each party makes their respective payment to the owner so that the owner receives full rent.

Even though the family is determined to be eligible for the program, the owner has the responsibility of approving the family as a suitable renter. The IHA continues to make payments to the owner as long as the family is eligible and the housing unit continues to qualify under the program.

VI. HCV Partnerships

To administer the HCV program, the IHA enters into a contractual relationship with HUD. The IHA also enters into contractual relationships with the assisted family and the owner or landlord of the housing unit.

For the HCV program to work and be successful, all parties involved—HUD, the IHA, the owner and the family—have important roles to play. The roles and responsibilities of all parties are defined in federal regulations and in legal documents that parties execute to participate in the program.

What does HUD do?

HUD had the following major responsibilities:

- Develop regulations, requirements, handbooks, notices and other guidance to implement HCV housing program legislation passed by Congress;
- Allocate HCV program funds to IHA;
- Provide technical assistance to IHA in interpreting and applying HCV program requirements;
- Monitor IHA compliance with HCV program requirements and IHA performance in program administration.

What does the IHA do?

The IHA administers the HCV program under contract with HUD and has the following major responsibilities:

- Establish local policies;
- Review applications from interested applicant families to determine whether applicants are eligible for the program;
- Maintain waiting list and select families for admission;
- Issue voucher to selected family and, if necessary, assist the family in finding a place to live;
- Conduct outreach to owners, with special attention to owners outside of poverty or minority concentration;
- Approve the rental unit (including assuring compliance with housing quality standards and rent reasonableness), the owner, and the tenancy;
- Make housing assistance payments to the owner in a timely manner;
- Ensure that families and their rental units continue to qualify under the program;
- Ensure that owners and families comply with the program rules;
- Provide families and owners with prompt, professional service;
- Comply with all fair housing and equal opportunity requirements, HUD regulations and requirements, the Annual Contributions contract, HUD-approved applications for funding, the IHA's administrative plan, and other applicable federal, state and local laws.

What does the Owner do?

The owner has the following major responsibilities:

- Screen families who apply for tenancy, to determine if they will be good renters
 - The IHA can provide some information to the owner, but the primary responsibility for tenant screening rests with the owner
 - The owner should consider family background factors such as rent and bill-paying history, history of caring for property, respecting the rights of others to peaceful enjoyment of the property, compliance with essential conditions of tenancy, whether the family is engaging in drug-related criminal activity or other criminal activity that might threaten others;
- Comply with the terms of the Housing Assistance Payments contract, executed with IHA;

- Comply with all applicable fair housing laws and discriminate against no one;
- Maintain the housing unit by making necessary repairs in a timely manner;
- Collect rent due from the assisted family and otherwise comply with and enforce provisions of the dwelling lease.

What does the family do?

The family has the following responsibilities:

- Provide the IHA with complete and accurate information, determined by the IHA to be necessary for administration of the program;
- Make their best and most timely efforts to find a place to live that is suitable for them and that qualifies for the program;
- Cooperate in attending all appointments scheduled by IHA;
- Allow the IHA to inspect the unit at reasonable times and after reasonable notice;
- Take responsibility for care of the housing unit, including any violations of housing quality standards caused by the family;
- Comply with the terms of the lease with the owner;
- Comply with the family obligations of the voucher (listed on the voucher);
- Not commit serious or repeated violations of the lease;
- Not engage in drug-related or violent criminal activity;
- Notify the IHA and the owner before moving or terminating the lease;
- Use the assisted unit only for residence and as the sole residence of the family; Not sublet the unit, assign the lease, or have any interest in the unit;
- Promptly notify the IHA of any changes in family composition;
- Not commit fraud, bribery, or any other corrupt or criminal act in connection with any housing programs.

If all parties fulfill their obligations in a professional and timely manner, the program responsibilities will be fulfilled in an effective manner.

SELECTION FROM THE WAIT LIST (24 CFR 982.54 (d) (1))

[Selection and admission of applicants from the PHA waiting list, including any PHA admission preferences, procedures for removing applicant names from the waiting list, and procedures for closing and reopening the PHA waiting list]

The Indianapolis Housing Agency administers its tenant based wait list as required by HUD regulations (24 CFR 982.204). To qualify for placement on the wait list, the applicant must qualify as a family. The definition of family (for the purpose of this administrative plan) is defined on page 4.

The family must designate a head of household. The head of household is the adult member of the household who is responsible for conducting the family's business with the Indianapolis Housing Agency and has the legal capacity to enter into a lease under Indiana law. Minors who have been emancipated by a recognized court of law may be recognized as head of household.

Selection from Tenant Based Wait List

Applicant families will be selected from the wait list in sequence as determined by lottery selection and verified preferences.

Income Targeting

To be eligible for assistance, an applicant must have annual income that does not exceed the very low-income limits (at or below 50% of area median) for occupancy as determined and published by HUD.

Admission Preferences

The Indianapolis Housing Agency preference system is used to establish the order of placement on the waiting list, not to guarantee admission. Preferences will be granted to applicants who are otherwise qualified and who, at the time they are certified for admission, meet definitions of the preference(s) described below:

National and/or State Disaster Affected Families-

Individuals or families displaced by a natural disaster, so declared by the President of the United States and/or the Governor of Indiana, shall receive preference. Priority will be given to individuals or families who had Section 8 housing choice vouchers at the time they were displaced by the natural disaster.

Persons who meet this preference criterion may apply for Section 8 housing choice voucher assistance at any time.

Opening the Tenant Based Wait List

The Indianapolis Housing Agency announces the reopening of the tenant-based wait list in accordance with HUD requirements. Announcements are advertised through public notice in newspapers of general circulation, minority publications and media entities. The notice contains a brief description the dates, times and locations where families may apply. The waiting list will remain open long enough to achieve a waiting list adequate to cover projected turnover and new allocations.

Closing the Tenant Based Wait List

The public notice that announces the reopening of the tenant based wait list will include the length of time that applications will be accepted. Applications will be accepted up to the close of business on the date announced in the public notice. For the purpose of this administrative plan, applications that are post marked on or before the closing date will be accepted. At no time will an application that is submitted by U.S. Mail be accepted later than 10 calendar days after the closing date of the waiting list. The Indianapolis Housing Agency does not accept any liability or responsibility for applications that are lost and/or misdirected by the U.S. Post Office.

ISSUING AND DENYING VOUCHERS (24 CFR 982.54 (d) (2))

[Issuing or denying vouchers, including PHA policy governing the voucher term and any extensions or suspensions of the voucher term. "Suspension" means stopping the clock on the term of a family's voucher after the family submits a request for approval of the tenancy. If the PHA decides to allow extensions or suspensions of the voucher term, the PHA administrative plan must describe how the PHA determines whether to grant extensions or suspensions, and how the PHA determines the length of any extension or suspension]

Issuing and Denying Vouchers (Initial Eligibility)

When funding is available, the Indianapolis Housing Agency will issue vouchers to applicants whose eligibility has been determined. To the extent necessary, the Indianapolis Housing Agency will over-issue vouchers to achieve maximum occupancy/utilization.

The full HUD-required briefing is conducted for applicant families who are determined to be eligible for assistance. To the extent practicable, briefings will be conducted in groups. Individual briefings will be conducted for applicants as necessary or as a reasonable accommodation for a person with a disability. Applicants who fail to attend two (2) scheduled voucher issuance briefings, without prior notification and approval from the Indianapolis Housing Agency will be denied admission to the Housing Choice Voucher Program for violation of family obligations (failure to supply needed information for certification).

In the case of non-resident applicants, where neither the applicant nor the spouse of the applicant had a "domicile" (legal residence) in IHA's jurisdiction when application was made, the following will apply:

- The family may lease a unit anywhere in the jurisdiction of IHA
- The family will not have the right to portability (during the initial 12 months following the issuance of the voucher)
- Exceptions may be made for families receiving vouchers due to HUD special admissions

Issuing and Denying Vouchers (Moves)

A move briefing will be conducted for participants to be reissued a voucher to move from one assisted unit to another. All participating families who have not been recertified within the past 120 days will be required to attend a recertification briefing. The recertification briefing will be conducted at the same time as the move briefing. To the extent practicable, briefings will be conducted in groups. Individual briefings will be conducted as necessary or as a reasonable accommodation for a person with a disability. Participants who fail to attend the scheduled move voucher issuance briefings, without prior notification and approval from the Indianapolis Housing Agency will be required to resubmit a request to move.

The time frame for scheduling briefings (for participants) may vary depending on the volume of moves being requested.

IHA may deny request for families wishing to relocate to higher costs units as deemed necessary due to budget constraints.

Participating families who owe money to the Indianapolis Housing Agency or any other housing agency/authority will be denied the opportunity to move until the balance owed is paid in full.

Participants who are in the first year of their assisted lease will be denied the opportunity to move with continued assistance. However, participants may be reissued a voucher within 60 days of the expiration of the first year of the lease.

Voucher Term and Extensions

The initial term of a Housing Choice Voucher for an applicant is 60 days. At the written request of the family, the Indianapolis Housing Agency may extend the term of the voucher an additional 30 days. The request for extension will only be considered for families who demonstrate and are able to verify extenuating circumstances. At no time will the Indianapolis Housing Agency extend a voucher beyond 90 calendar days except where providing reasonable

accommodations for a person with disabilities. The Indianapolis Housing Agency will not suspend (toll) the number of days required to process the request for tenancy approval.

Special Admissions as designated by a HUD directive (such as HUD relocations, foreclosures, demolition, disposition, etc.) may require additional extensions on a project-by-project and/or case-by case basis.

If the voucher expires and is not extended or expires after an extension, the family will be denied assistance. The family is not entitled to an informal review/hearing when a voucher expires.

The initial term of a Housing Choice Voucher for a participant is 120 days. At the written request of the family, the Indianapolis Housing Agency will extend the term of the voucher up to an additional 60 days. At no time will the Indianapolis Housing Agency extend a voucher beyond 180 calendar days. The Indianapolis Housing Agency will not suspend (toll) the number of days required to process the request for tenancy approval. Participants who have not located a new unit may remain in their unit if there is an assisted lease/HAP Contract in effect. If the family vacates their assisted unit during their search time, no extensions will be granted.

SPECIAL FUNDING (24 CFR 982.54 (d) (3))

[Any special rules for use of available funds when HUD provides funding to the PHA for a special purpose (e.g., desegregation), including funding for specified families or a specified category of families]

Special Rules

The Indianapolis Housing Agency administers all programs in accordance with HUD requirements. Special admission applicants will be admitted outside of the regular waiting list process. Applicants do not have to qualify for any preferences, nor are they required to be on the wait list. The Indianapolis Housing Agency maintains separate records of these admissions.

OCCUPANCY POLICIES (24 CR 982.54 (d) (4))

[Occupancy policies, including:

(i) Definition of what group of persons may qualify as a "family";

(ii) Definition of when a family is considered to be "continuously assisted";

(iii) Standards for denying admission or terminating assistance based on criminal activity or alcohol abuse in accordance with § 982.553]

Definition of Family

For the purpose of this administrative plan, a family is defined as a single person (including an elderly or disabled person) or two or more persons who intend to share residency whose income and resources are available to meet the household needs.

Definition of Continuously Assisted

An applicant is continuously assisted under the 1937 Housing Act if the family is already receiving assistance under any 1937 Housing Act program when the family is admitted to the housing choice voucher program. A family is not considered "continuously assisted" if it has not participated in a program under the 1937 Housing Act for a period of 180 calendar days or longer.

Standards for Denying Admission or Terminating Assistance Based on Criminal Activity or Alcohol Abuse

It is the policy of the Indianapolis Housing Agency to conduct a criminal background check at the following times:

- all applicants (including ports, special admissions, etc.)
- at the request to add an adult (18 years of age or older) to the household
- accusation of criminal involvement
- as part of quality control of file (random selection of files pulled for quality control of recertifications)

including all adult household members. Background checks are used to determine whether applicants and participants are eligible to participate in the program. All screening and termination of assistance procedures of the Indianapolis Housing Agency are administered fairly and in such a way as not to violate rights to privacy or discriminate on the basis of race, color, nationality, religion, familial status, disability or other legally protected group(s).

It is the policy of the Indianapolis Housing Agency to deny participation in the program to applicants and terminate assistance to participants in cases where it can be reasonably determined that a household member is illegally using a drug or if a person abuses alcohol in a way that may interfere with the health, safety or right to peaceful enjoyment by other residents. The Indianapolis Housing Agency will also deny or terminate assistance when it can be determined that there is a pattern of illegal use of a drug or a pattern of alcohol abuse. For the purpose of this administrative plan, the Indianapolis Housing Agency will consider the use of a controlled substance or alcohol to be a pattern if there are one or more incidents during the previous five (5) years. In evaluating evidence of negative past behavior, the Indianapolis Housing Agency will give fair consideration to the seriousness of the activity with respect to how it would affect other residents, and/or likelihood of favorable conduct in the future which could be supported by evidence of rehabilitation.

"Engaged in or engaging in" violent or drug related criminal activity means any act within the past five (5) years by an applicant or participant or household member which involved criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage.

The use of public records, including, but not limited to police reports, court records and news media reports may be used to determine if an applicant, participant or household member has engaged in or is engaging in drug related and/or violent criminal activity. For the purpose of this administrative plan, an arrest or conviction is not required to determine if an applicant, participant or household member has engaged in violent criminal activity.

Assistance in the Housing Choice Voucher Program will be denied or terminated if the head of household or any member of the household:

- Is subject to a lifetime registration requirement under a State sex offender registration program; and/or
- Has engaged in any criminal activity that has resulted in the negligible death of any person; and/or
- Has engaged in any criminal activity that has as one of its elements sexual assault and/or abuse; and/or
- Has been evicted from public or assisted housing for any lease or family obligation violation (will be denied for up to a minimum of three years from said eviction) and/or
- Has engaged in the manufacturing, distribution, or use of methamphetamine

OWNER OUTREACH (24 CFR 982.54 (d) (5))

[Encouraging participation by owners of suitable units located outside areas of low income or minority concentration]

At voucher issuance briefings, families are encouraged to search for housing in non-impacted areas. It is the policy of the Indianapolis Housing Agency to assist families who choose to seek housing opportunities. The assistance provided includes, but is not limited to:

- Provide families with a search record form to gather and record information
- Make direct contact with landlords/managers
- Provide mobility counseling to families
- Provide information about the services available in all areas of the community
- Meet with neighborhood groups to promote the benefits of the housing choice voucher program
- Conduct formal and informal discussions with landlord associations
- Meet with agencies and groups that promote fair housing

DISCRIMINATION COMPLAINTS (24 CFR 982.54 (d) (6))

[Assisting a family that claims that illegal discrimination has prevented the family from leasing a suitable unit]

It is the policy of the Indianapolis Housing Agency to assist families who claim illegal discrimination. All applicants and participants are provided a copy of the HUD brochure entitled, "Fair Housing It's Your Right." A copy of the discrimination complaint form (form HUD-903) is also provided.

The Indianapolis Housing Agency will assist families in the completion and submission of the discrimination complaint form. In addition, and when appropriate, families will be referred to community organizations who enforce fair housing laws.

INFORMATION TO OWNERS (24 CFR 982.54 (d) (7))

[Providing information about a family to prospective owners]

It is the policy of the Indianapolis Housing Agency to provide a potential owner the family's current and prior address as shown in our records, and the name and address (if known) of the landlord at the family's current and prior address.

The Indianapolis Housing Agency will not provide an owner any information regarding the family's criminal history. The Indianapolis Housing Agency reserves the right to provide previous tenancy history to potential owners for tenants who currently or previously occupied Indianapolis Housing Agency owned/operated properties.

DISSAPPROVAL OF OWNERS (24 CFR 982.54 (d) (8))

[Disapproval of owners]

The owner does not have a right to participate in the Housing Choice Voucher Program. For purposes of this section, “owner” includes a principal or other interested party.

The Indianapolis Housing Agency reserves the right to disapprove owners for any of the following reasons:

- The owner has violated obligations under a housing assistance payments contract under Section 8 of the 1937 Act (42 U.S.C. 1437f).
- The owner has committed fraud, bribery or any other corrupt act in connection with any Federal housing program.
- The owner has engaged in drug-related criminal activity or any violent criminal activity.
- The owner has a history or practice of non-compliance with the HQS for units leased under the tenant-based programs or with applicable housing standards for units leased with project-based Section 8 assistance or leased under any other Federal housing program.
- The owner has a history or practice of renting units that fail to meet State and/or local housing codes.
 - The owner has a history or practice of failing to terminate tenancy of tenants of units assisted under Section 8 or any other federally assisted housing program for activity by the tenant, any member of the household, a guest or another person under the control of any member of the household that:
 - Threatens the right to peaceful enjoyment of the premises by other residents;
 - Threatens the health or safety of other residents, of employees of the Indianapolis Housing Agency, or of owner employees or other persons engaged in management of the housing.
 - Threatens the health or safety of, or the right to peaceful enjoyment of their residences, by persons residing in the immediate vicinity of the premises; or
 - Is drug-related criminal activity or violent criminal activity;
- The owner has not paid State or local real estate taxes, fines or assessments.
- The owner has failed to comply with regulations, the mortgage or note, or the regulatory agreement for projects with mortgages insured by HUD or loans made by HUD.

SUBSIDY STANDARDS (24 CFR 982.54 (d) (9))

[Subsidy standards]

Subsidy standards are standards established by the Indianapolis Housing Agency to determine the appropriate number of bedrooms and the amount of subsidy for families of different sizes and compositions. The Indianapolis Housing Agency does not determine who shares bedrooms/sleeping rooms.

All standards in this section relate to the number of bedrooms on the voucher, not the family's actual living arrangements.

Subsidy standards must:

- Provide for the smallest number of bedrooms needed to house a family without overcrowding
- Be applied consistently to all families of like size and composition
- Be consistent with space requirements under the housing quality standards 24 CFR 982.401(d)

The family unit size is the number of bedrooms needed for families of different sizes and compositions, and is used to determine the maximum rent subsidy for the family.

It is the general policy of the Indianapolis Housing Agency to assign one bedroom on the voucher for each two family members, with the exception of the head of household. Exceptional factors such as age and medical may be considered when assigning the number of bedrooms on the voucher.

Additional exceptions include:

- A child who is temporarily away from home because of placement in foster care will be given consideration
- Foster children will be considered in determining unit size only if verification is provided stating the children will be in the unit for more than 12 months
- Live-in attendants, who reside with the assisted family, will generally be provided a separate bedroom. No additional bedrooms are provided for the attendant's family.
- Space will not be provided for a family member, other than a spouse, who will be absent most of the time, such as a member who is away in the military.
- A single pregnant woman with no other family members will be allocated a two-bedroom voucher.
- A single person household will be allocated a **one**-bedroom voucher.

The family may request an exception to the subsidy standards on the basis of health, handicap, and age (elderly). Such request must be made in writing within 10 days of the issuance of the voucher. The request must explain the need or justification for a different bedroom size designation. Documentation verifying the need or justification will be required. A knowledgeable medical professional must verify requests based upon health reasons. All requests are subject to the approval of the Indianapolis Housing Agency.

The Indianapolis Housing Agency will not issue or consider a larger voucher due to additions of family members other than by birth, adoption, marriage or court awarded custody (in these instances legal documentation must be provided).

ABSENCE FROM DWELLING UNIT (24 CFR 982.54 (d) (10))

[Family absence from the dwelling unit]

The Indianapolis Housing Agency must compute all applicable income of every family member who is on the lease, including those who are temporarily absent. In addition, the income of the spouse or the head of the household if that person is temporarily absent, even if that person is not on the lease must be counted.

“Temporarily absent” is defined as away from the unit for more than 180 days. Income of persons permanently absent will not be counted. If the spouse is temporarily absent and in the military, all military pay and allowances (except hazardous duty pay when exposed to hostile fire and any other exceptions to military pay HUD may define) is counted as income.

It is the responsibility of the head of household to report changes in family composition. The Indianapolis Housing Agency will evaluate absences from the unit using this policy.

Absence of Any Member

Any member of the household will be considered permanently absent if s/he is away from the unit for 30 days except as otherwise provided in this section.

Absence due to Medical Reasons

If any family member leaves the household to enter a facility such as hospital, nursing home, or rehabilitation center, the Indianapolis Housing Agency will seek advice from a reliable qualified source as to the likelihood and timing of their return. If the verification indicates that the family member will be permanently confined to a nursing home, the family member will be considered permanently absent. If the verification indicates that the family member will return in less than 180 consecutive days, the family member will not be considered permanently absent.

If the person who is determined to be permanently absent is the sole member of the household, assistance will be terminated in accordance with the “Absence of Entire Family” section below.

Absence Due to Full-time Student Status

A student (other than head of household or spouse) who attends school away from home but lives with the family during school recesses may, at the family's choice, be considered either temporarily or permanently absent. If the family decides that the member is permanently absent, income of that member will not be included in total household income, the member will not be included on the lease and the member will not be included for determination of voucher size. Conversely, if a family decides that the member is temporarily absent, income of that member will be included in the total household income, the member will be included on the lease and the member will be included for the determination of voucher size.

Absence due to Incarceration

If the sole member is incarcerated for more than 30 days, s/he will be considered permanently absent. Any member of the household, other than the sole member, will be considered permanently absent if s/he is incarcerated for 30 days. The Indianapolis Housing Agency will determine if the reason for incarceration is for drug-related or violent criminal activity, or any other violation of a family obligation.

Absence of Children due to Placement in Foster Care

If the family includes a child or children temporarily absent from the home due to placement in foster care, the Indianapolis Housing Agency will determine from the appropriate agency when the child/children will be returned to the home. If the time period is to be greater than 180 days from the date of removal of the children, the voucher size will be reduced at the next annual reexamination. If all children are removed from the home permanently, the voucher size will be reduced in accordance with the subsidy standards at the next annual reexamination.

Absence of Entire Family

These policy guidelines address situations when the family is absent from the unit, but has not moved out of the unit. In cases where the family has moved out of the unit, the Indianapolis Housing Agency will terminate assistance in accordance with appropriate termination procedures contained in this Plan. Families are required both to notify the

Indianapolis Housing Agency before they move out of a unit and to give information about any family absence from the unit.

The family will supply any information or certification requested by the Indianapolis Housing Agency to verify that the family is living in the unit, or relating to family absence from the unit, including any requested information or certification on the purposes of family absences. The family will cooperate with the Indianapolis Housing Agency for this purpose. If the family will be absent from the unit for more than 30 days it will promptly, but no more than 21 calendar days from the first day of absence, notify both the owner and the Indianapolis Housing Agency in writing. The Indianapolis Housing Agency will evaluate the request and provide a written response to the family.

To obtain Indianapolis Housing Agency approval, the family will:

- Satisfy notice requirements; and
- Provide documentation acceptable to the IHA regarding the length of absence and the reason for the absence; and
- Affirm their intent to return to the unit at the end of the leave period; and
- Agree to be responsible for receiving and responding to all notices sent by the IHA to the unit during periods of absence; and
- Pay rent to the owner and pay for utilities while they are absent; and
- Make arrangements for the unit to be available for IHA inspections as necessary.

If this procedure is not followed, the unit will be considered abandoned and the Indianapolis Housing Agency will terminate housing assistance payments and the family's participation in the program. HUD regulations require the Indianapolis Housing Agency to terminate assistance if the entire family is absent from the unit for a period of more than 180 consecutive calendar days.

"Absence" means that no family member is residing in the unit. In order to determine if the family is absent from the unit, the Indianapolis Housing Agency may:

- Write letters to the family at the unit
- Telephone the family at the unit
- Verify if utilities are in service
- Check with the post office

The Indianapolis Housing Agency reserves the right to extend any deadline listed in this section as an accommodation to persons with disabilities. In cases where housing assistance is terminated, the Indianapolis Housing Agency reserves the right to reinstate assistance as an accommodation to persons with disabilities. At no time will the Indianapolis Housing Agency extend absences that are in excess of 180 days.

FAMILY BREAK-UP (24 CFR 982.54 (d) (11))

[How to determine who remains in the program if a family breaks up]

In those instances when a family assisted under the Housing Choice Voucher Program becomes divided into two otherwise eligible families due to divorce, legal separation, or the division of the family, and the new families cannot agree as to which new family unit should continue to receive the assistance, and there is no determination by a court, the Section 8 Director will consider the following factors to determine which of the families will continue to be assisted:

- Which of the two new family units has custody of dependent children.
- Which family member was the head of household when the voucher was initially issued (listed on the initial application).
- The composition of the new family units, and which unit contains elderly or disabled members.
- Whether domestic violence was involved in the breakup.
- Which family members remain in the unit.
- Recommendations of social service professionals.

Documentation of these factors will be the responsibility of the requesting parties.

If documentation is not provided, the Indianapolis Housing Agency may terminate assistance on the basis of failure to provide information necessary for a **certification and/or** recertification.

INFORMAL REVIEWS (24 CFR 982.54 (d) (12))

[Informal review procedures for applicants]

It is the policy of the Indianapolis Housing Agency to conduct Informal Reviews in the same manner as Informal Hearings.

INFORMAL HEARINGS (24 CFR 982.5 (d) (13))

[Informal hearing procedures for participants]

It is the policy of the Indianapolis Housing Agency to ensure that all families have the benefit of all protections due to them under the law. This policy defines the Informal Hearing procedures for applicants and participants.

It is the objective of the Indianapolis Housing Agency to resolve disputes at the lowest level possible. When disputes cannot be resolved and a hearing is required by regulation, an informal hearing will be scheduled. Applicants and participants who disagree with a determination of the Indianapolis Housing Agency must request a hearing in writing within 10 business days of the notice.

The Indianapolis Housing Agency will notify the applicant/participant of the date, time and location of the discovery meeting. During the discovery meeting, the applicant/participant will be provided the opportunity to review the file and any documents or evidence in the possession of the Indianapolis Housing Agency that were used to make the determination. The family may request a copy of any document or evidence that will be used at the hearing during the discovery meeting. The Indianapolis Housing Agency reserves the right to charge \$0.25 per page for copies requested by the family.

If a family does not appear at a scheduled hearing and has not rescheduled the hearing in advance, the family must contact the Indianapolis Housing Agency within one (1) business day. The Indianapolis Housing Agency will reschedule the hearing only if the family can show good cause for the failure to appear.

A hearing officer appointed by the Indianapolis Housing Agency will conduct the Informal Hearing. Neither the person who made or approved the decision, nor a subordinate of that person shall be appointed as hearing officer.

A notice of the hearing findings shall be provided in writing within 30 calendar days. If the family misses an appointment or deadline ordered by the hearing officer, the action of the Indianapolis Housing Agency shall take effect and another hearing will not be granted.

The Indianapolis Housing Agency reserves the right to overturn the decision of the hearing officer in accordance with HUD requirements. When the Indianapolis Housing Agency chooses to exercise this right, a notice will be sent to the applicant/participant within 10 business days of the hearing officers decision.

The Indianapolis Housing Agency reserves the right to withdrawal the denial/termination of assistance notice at any time prior to or after the Informal Hearing.

All requests for hearing, supporting documentation and a copy of the final decision will be retained in the family's file.

PAYMENT STANDARDS (24 CFR 982.54 (d) (14))

[The process for establishing and revising voucher payment standards]

It is the policy of the Indianapolis Housing Agency to set its payment standards for all bedroom sizes at **90% of the published fair market rent**. The Indianapolis Housing Agency payment standards will adjust automatically when HUD publishes new fair market rents.

MINIMUM RENT (24 CFR 5.623)

The Indianapolis Housing has established as policy a minimum rent of \$50, which applies to all voucher holders.

RENT REASONABLENESS (24 CFR 982.54 (d) (15))

[The method of determining that rent to owner is a reasonable rent (initially and during the term of a HAP contract)]

The Indianapolis Housing Agency will compare characteristics of the contract unit with characteristics of comparable unassisted units and will consider:

- Location, quality, size unit type, and age of the contract unit: and
- Amenities, housing services, maintenance and utilities to be provided by the owner in accordance with the lease.

In accordance with 24 CFR 982.512, the Indianapolis Housing Agency will also consider whether or not the contract unit is receiving other subsidies. These units may be subject to limits in addition to rent reasonableness. The Indianapolis Housing Agency will assess rent reasonableness by conducting either telephone calls, site visits after telephoning, or more extensive market surveys of available rental units. The Indianapolis Housing Agency will also consider the following:

- Market rent information obtained from the city, real estate agents, or banks;
- Rental information obtained from classified advertisements in newspapers; and
- The HUD Field Office Data Appraiser.

The Indianapolis Housing Agency will not accept documentation provided by a landlord or other party. Any information submitted by a landlord must be able to be verified to the Indianapolis Housing Agency's satisfaction. Independent documentation that cannot be verified to the Indianapolis Housing Agency's satisfaction should not be considered acceptable documentation. Where independent information is submitted the burden of proof is appropriately on the landlord.

The Indianapolis Housing Agency will not accept information that cannot be confirmed as true, accurate or genuine. A current lease, executed within the past six months is the best documentation a landlord can provide. With respect to verifying rental payments made by unsubsidized tenants-at-will (no lease) the Indianapolis Housing Agency may request that the landlord obtain a certified copy of his/her federal income tax return submitted for the previous year. Landlords are required to report rental income for federal income tax purposes on Schedule E of Form 1040. Up to three individual properties may be entered on Schedule E. For landlords who have multiple units and use accountants to prepare the Schedule E, a statement by their accountant may be considered sufficient documentation as to the rent paid on a particular unit.

To summarize, the Indianapolis Housing Agency is willing to receive additional documentation from landlords, but will exercise considerable judgement in determining if the documentation, as submitted, is acceptable. Documentation submitted for a unit, which is not "comparable" in the Indianapolis Housing Agency's judgment, will not be accepted. Even one, well-documented, verifiable "comparable" submitted by a landlord will not be considered if the Indianapolis Housing Agency is able to document that this one unit represents the exception, rather than the rule in that particular community or area.

SPECIAL HOUSING TYPES (24 CFR 982.54 (d) (16))

[Special policies concerning special housing types in the program (e.g., use of shared housing)]

Homeownership Program

The Indianapolis Housing Agency offers the Section 8 Homeownership and ROSS Public Housing Homeownership Supportive Services Options to eligible participants. The policies and procedures for these programs are contained in the Homeownership Addendum on page 31 of this Administrative Plan.

Project Based Assistance Program

The Indianapolis Housing Agency has designated up to 600 tenant-based vouchers for participation in the Section 8 Project-Based Assistance Program. The policies and procedures for this program are contained in the Project Based Assistance Program Addendum on page 46 of this Administrative Plan.

FAMILY AND OWNER DEBTS TO THE INDIANAPOLIS HOUSING AGENCY (24 CFR 982.54 (d) (17))

[Policies concerning payment by a family to the PHA of amounts the family owes the PHA]

Family Debts

The Indianapolis Housing Agency will make all reasonable attempts to collect all money owed by families. Methods to collect family debts include, but are not limited to:

- Request for lump sum payments; and/or
- Civil suits; and/or
- Payment/Repayment agreements; and/or
- Collection agencies; and/or
- Credit bureaus

Families who are unable to make a lump sum payment for an unsettled debt may chose to enter into a repayment agreement with the Indianapolis Housing Agency. The Indianapolis Housing Agency reserves the right not to enter into a repayment agreement if the family has an existing repayment agreement in place that has not been paid in full. The Indianapolis Housing Agency will not enter into a promissory note with a family when the note will exceed \$5,000.00. The maximum term of the promissory note is 12 months.

To remain in good standing, the family must abide by all terms and conditions of the repayment agreement. The Indianapolis Housing Agency may deny or terminate housing assistance for families who default on the agreement.

Owner Debts

The Indianapolis Housing Agency will make all reasonable attempts to collect all money owed by owners. Methods to collect family debts include, but are not limited to:

- Request for lump sum payments; and/or
- Recapture from on-going Housing Assistance Payments (HAP); and/or
- Civil suits; and/or
- Payment/Repayment agreements; and/or
- Collection agencies; and/or
- Credit bureaus

Owners who are unable to make a lump sum payment or do not receive adequate HAP to satisfy an unsettled debt may chose to enter into a repayment agreement with the Indianapolis Housing Agency. The Indianapolis Housing Agency reserves the right not to enter into a repayment agreement if the owner has an existing repayment agreement in place that has not been paid in full. The Indianapolis Housing Agency will not enter into a promissory note with an owner when the note will exceed \$5,000.00. The maximum term of the promissory note is 12 months.

To remain in good standing, the owner must abide by all terms and conditions of the repayment agreement. The Indianapolis Housing Agency may deny or terminate housing assistance for owners who default on the agreement.

INTERIM REEXAMINATIONS (24 CFR 982.54 (d) (18))

[Interim redeterminations of family income and composition]

Change to Family Composition

Families are required to report all changes in family composition to the Indianapolis Housing Agency in writing within 10 business days of the change. An interim examination may be conducted, at the IHA's option, whenever there is a change in family composition.

Changes to Family Income and Expense

The family may request an interim examination whenever the family has a reduction in income and/or expense.

Families receiving an increase in income must report all increases in household income of \$50 per week or more, \$100 bi-weekly or more, \$200 per month or more and \$2400 per year or more. Changes must be reported in writing within 10 business days of the change. The Indianapolis Housing Agency will process all interim changes as a result of such increases.

Effective Date of Changes to Family Income and Expense

All changes that result in an increase in tenant rent will be made effective on the first day of the month, following:
30-day notice of the change to the owner and family

➤ **RESTRICTIONS ON THE NUMBER OF MOVES** (24 CFR 982.54 (d) (19))

[Restrictions, if any, on the number of moves by a participant family (see § 982.314(c))]

It is the policy of the Indianapolis Housing Agency to restrict the number of moves a family is permitted to make. In general, families are not permitted to move more than once in a 12-month period, including moves inside or outside the Indianapolis Housing Agency.

The Section 8 Director may make exceptions to this policy on a case-by-case basis if there is an emergency reason for the move over which the participant has no control.

Portability Procedures (24CFR 982.353 (c)(1), 982.355, PIH Notice 2004-12)

In the case of non-resident applicants, where neither the applicant nor the spouse of the applicant had a “domicile” (legal residence) in IHA’s jurisdiction when application was made, the following will apply:

- The family may lease a unit anywhere in the jurisdiction of IHA
- The family will not have the right to portability (during the initial 12 months following the issuance of the voucher)
- Exceptions may be made for families receiving vouchers due to HUD special admissions

Outgoing-

- Request to Port submitted by family
- Determine if family is in good standing
- Determine if family is eligible to move and to be issued a voucher in accordance to Admin Plan, “Issuing and Denying Vouchers”
- Inform client of Port Procedures and limitations
 - ✓ Can not move to area with higher costs unless receiving agency will absorb
 - ✓ Must provide signed 30-day notice from current landlord
 - ✓ Must provide portability information sheet
 - ✓ Must provide forwarding address
 - ✓ Must attend briefing prior to transfer of paperwork
 - ✓ Must contact receiving agency within 10 days of transfer of paperwork
- Schedule family to attend a briefing
- Collect all required forms as stated above
- Family signs voucher
- Contact the receiving agency
 - ✓ Determine payment standards for their area
 - ✓ Determine any discrepancies in subsidy standards
 - ✓ Inform receiving agency that we will not pay if area costs are higher
 - ✓ Inform receiving agency of when paperwork will be sent
- Hud-52265 and all relevant paperwork and forms transferred to Receiving Agency (by fax and mail)
- Cancel current contract as indicated on 30-day notice
- If outgoing receiving agency must provide billing notification within 60 days of expiration of our voucher
- IHA must grant any extensions to the voucher term

Incoming

- Upon receipt of Hud-52265, schedule briefing within 2 weeks (no exceptions)
- Issue Voucher and Request for Tenancy Approval
Note: *for applicants only-determine income eligibility prior to issuing voucher
- Any extensions must be granted by the Initial Agency
- Follow new move process
- Withdraw voucher if voucher expires and notify Initial Agency

Notification Deadlines

- Notify Initial Agency within 10-days of contract execution of intent to bill or absorb, by sending Part 2 of Hud-52265
- If billing initial payment must be forwarded within 30 days of sending the Part 2 Hud-52265
- Initial Agency must receive bill by the 5th working day of each month
- Any changes in billing must be provided to Initial Agency within 10 working days of the effective date of change
- If denying family, family must be given the opportunity to grieve the denial
- If outgoing receiving agency must provide billing notification within 60 days of expiration of our voucher
- Notification of termination or absorption must be received and/or submitted within 10 days of action

IHA shall have the right to modify any provision of the Portability Procedure not governed by statute or regulation for good cause or to comply with changes in HUD regulation or directives.

ADMINISTRATIVE FEE RESERVE (24 CFR 982.54 (d) (21))

[Approval by the Board of Commissioners or other authorized officials to charge the administrative fee reserve]

The Indianapolis Housing Agencies Board of Commissioners must approve all expenditures from the administrative fee reserve.

HOUSING QUALITY STANDARDS (24 CFR 982.54 (d) (22))

[Procedural guidelines and performance standards for conducting required HQS inspections]

The Indianapolis Housing Agency inspection requirements for housing quality standards utilize both HUD's Housing Quality Standards and Chapter 10 Minimum Standards for Residential Property and Housing from the Code of The Health and Hospital Corporation. The Health and Hospital Corporation is a municipal corporation authorized by the Indiana General Assembly to exercise legislative powers in addition to its executive agency powers. In other words, the Corporation, by its Board of Trustees, has the power to enact legislation. Further, the Corporation has the power to enforce the provisions of the legislation it enacts.

The IHA is required to conduct three types of inspections: initial, annual, and special inspections, including quality control inspections. Inspections result in pass, fail, or inconclusive reports. Pass inspections require no further action by the IHA. Fail or inconclusive inspections require follow-up reinspections or IHA verification to confirm the correction of the HQS infractions. Depending upon the nature of the item, responsibility for correction of fail or inconclusive items may be the responsibility of the owner or tenant. Failure to comply with correction notices results in owner or tenant sanctions, up to and including termination of the HAP.

Inspections may be performed by IHA staff or by a contractor designated by IHA.

The IHA shall schedule initial inspections in accordance with program requirements. Annual inspections, quality control inspections, and all resulting reinspections shall be scheduled to comply with SEMAP requirements. Other special inspections, such as complaint inspections, shall be scheduled as quickly as possible after receipt of request.

Abatement of Payments

The IHA *shall* abate HAP payments to owners who do not comply with notifications to correct HQS deficiencies within the specified time period: 24 hours or 30 days depending upon the nature of the deficiency. Placement of abatement shall occur by the first of the month following expiration of the notice. Except in the case of life threatening violations requiring corrections within 24 hours, the owner shall receive 30-day written notification of the abatement. The IHA shall use the *Notice of Housing Assistance Payment Abatement and Final Notice of Termination*, to notify the owner of abatement. Following a failure to comply with a notice of deficiency, owners are not entitled to HAP payments from the first of the month until the day the unit passes HQS.

Termination of HAP Contract

The IHA shall terminate the HAP contract for an owner's failure to comply with its terms and conditions, including non-compliance with HQS. Both the owner and the tenant shall be notified of intent to terminate. (Use *form - Notice of Housing Assistance Payment Abatement and Final Notice of Termination*).

The IHA shall issue a voucher to the family to move, provided the family is eligible (not in violation of the terms of assistance, including HQS responsibilities). The family shall be reminded of its responsibility to the owner to give notice of intent to move, and shall continue to pay its portion of the rent as long as the family remains in the unit.

Special Inspections

Special inspections include inspections in response to complaints. The IHA *shall* investigate complaints about HQS matters that are registered by tenants, owners or the general public. Violations resulting from complaint inspections are treated in the same manner as annual inspection violations. Failure to comply with violation notices issued from complaint inspections result in abatement of payment to owners and/or termination of program assistance for tenants.

Quality control inspections are a second type of special inspection and are required by program regulations. Special inspections resulting in a fail or inconclusive HQS determination require the same notification actions and enforcement processes described above for annual inspections.

Housing Quality Standards Criteria

The IHA inspection requirements for housing quality standards utilize both HUD's Housing Quality Standards and Chapter 10 Minimum Standards for Residential Property and Housing from the Code of The Health and Hospital Corporation. The Health and Hospital Corporation is a municipal corporation authorized by the Indiana General Assembly to exercise legislative powers in addition to its executive agency powers. In other words, the Corporation, by its Board of Trustees, has the power to enact legislation. Further, the Corporation has the power to enforce the provisions of the legislation it enacts.

Non-compliance with these standards is grounds for:

- Rejecting the unit at initial inspection
- Abating subsidy
- Terminating the HAP contract with the owner
- Termination of tenant participation in the program

Emergency Repair Items (24 CFR982.401 (a))

The following items are considered of an emergency nature and must be corrected by the owner or tenant (whoever is responsible) within 24 hours of notice by the inspector:

- Lack of security for the unit
- Waterlogged ceiling in imminent danger of falling
- Major plumbing leaks or flooding
- Natural gas leak or fumes
- Electrical problems which could result in shock or fire
- No heat
- Utilities not in service
- No running hot water
- Broken glass where someone could be injured
- Obstacle (s) which prevent tenant's entrance or exit
- Lack of functioning toilet

SCREENING FOR BEHAVIOR AND SUITABILITY (24 CFR 982.54 (d) (23))

[PHA screening of applicants for family behavior or suitability for tenancy]

The Indianapolis Housing Agency will not screen family behavior for suitability for tenancy. The Indianapolis Housing Agency will not be liable or responsible for the family's behavior or the family's conduct in tenancy. Screening for behavior and suitability is an owner responsibility.

HOMEOWNERSHIP ADDENDUM

Section 8 Homeownership Option

The Indianapolis Housing Agency (IHA) wishes to provide opportunities for individuals and families to become more economically empowered and secure through building family stability and wealth with homeownership options. Long viewed as one of the best ways for American families to create and pass on wealth, homeownership also offers many other valuable advantages. Recent studies have revealed, for example, that positive outcomes for children are dramatically increased through the stability of living in a family-owned home.

In offering the Section 8 Housing Choice Voucher Homeownership Option and ROSS Public Housing Homeownership Supportive Services Option, we seek to extend these and other benefits to participants to the individuals and families that we serve through the IHA Housing Choice Voucher Program.

The Indianapolis Housing Agency (IHA) will offer the homeownership option to all participants who meet the following eligibility requirements:

- The participant family is currently enrolled in the Family Self-Sufficiency (FSS) Program and in compliance with the FSS contract; or
- The participant family is a graduate of the IHA Family Self-Sufficiency (FSS) Program (or other Housing Authority's FSS Program, approved by IHA)

The Indianapolis Housing Agency will not offer the Section 8 Homeownership option to applicant families who are not currently participating in the Section 8 program.

The Indianapolis Housing Agency will offer vouchers to Public Housing families, who have satisfied the criteria of the ROSS Public Housing Homeownership Supportive Services Option as mandated by the grant (ROSS Homeownership and Supportive Services GMC Assignment Number HO-IN017-14043) approved by HUD. Vouchers may be issued as special admissions (see page 3, Special Funding), as requested and if available.

Additionally, under the ROSS Public Housing Homeownership Supportive Option applicant families must have completed an initial lease term and their first recertification in order to be eligible for the program. Applicants must have no more than (1) late rental payment in the last 12 months. Applicants must be eligible to receive a Housing Choice Voucher. Approved applicants may receive a Housing Choice Voucher by way of Special Admission (see Special Funding Page 3). (CFR982.203)

The Indianapolis Housing Agency will provide homeownership program opportunities up to 100 families at any given time.

Initial Homeownership Program Eligibility Requirements [24 CFR 982.627]

The family must meet all of the requirements listed below before the commencement of homeownership assistance.

The family must be eligible for the Housing Choice Voucher program.

The family must qualify as a first-time homeowner, or may be a co-operative member.

The family must meet the Federal minimum income requirement. The family must have a gross annual income equal to the Federal minimum wage multiplied by 2000 hours, based on the income of adult family members who will own the home. Unless the family is elderly or disabled, in which case the minimum income is equal to the amount of a monthly SSI payment for a single person without dependents, multiplied by 12. Unless the elderly or disabled, income from welfare assistance will not be counted toward this requirement.

The family must meet the Federal minimum employment requirement.

At least one adult family member who will own the home must be currently employed full time and must have been continuously employed for one year prior to homeownership assistance.

HUD regulations define “full time employment” as not less than an average of 30 hours per week.

A family member will be considered to have been continuously employed even if that family member has experienced a gap in employment, provided that the gap in employment:

Did not exceed 30 calendar days; and

The gap in employment did not occur within the 3 month period immediately prior to the family’s request to utilize the homeownership option; and

There has been no more than one (1) gap in employment within the past 12 calendar months.

The Federal minimum employment requirement does not apply to elderly or disabled families.

Any family member who has previously defaulted on a mortgage obtained through the homeownership option is barred from receiving future homeownership assistance.

The Indianapolis Housing Agency will impose the following additional initial requirements:

- The family may not owe money to the Indianapolis Housing Agency or any other Housing Authority.
- The family may not have committed any serious or repeated violations of a PHA-assisted lease within the past 12-month period.

Homeownership Counseling Requirements [24 CFR 982.630]

When the family has been determined eligible, they must attend and complete homeownership counseling sessions. Families will have the option of attending homeownership counseling, at their own expense, through approved not-for-profit organizations.

The following topics will be included in the homeownership counseling sessions:

- Responsible homeownership
- Home maintenance (including care of the grounds);
- Budgeting and money management;
- Credit counseling;
- How to negotiate the purchase price of a home;
- How to obtain homeownership financing and loan pre-approvals, including a description of types of financing that may be available, and the pros and cons of different types of financing;
- How to find a home, including information about homeownership opportunities, schools, and transportation in the PHA jurisdiction;
- Advantages of purchasing a home in an area that does not have a high concentration of low-income families and how to find homes in such areas;
- Information about Real Estate Settlement Procedures Act (RESPA), state and Federal truth-in-lending laws, and how to identify and avoid loans with oppressive terms and conditions;

Eligible Units [24 CFR 982.628]

The unit must meet all of the following requirements:

The unit must meet HUD's "Eligible Housing" requirements. The unit may not be any of the following:

A public housing or Indian housing unit;

A unit receiving Section 8 project-based assistance;

A nursing home, board and care home, or facility providing continual psychiatric, medical or nursing services;

A college or other school dormitory;

On the grounds of penal, reformatory, medical, mental, or similar public or private institutions.

The unit must be already existing or under construction at the time the family signs the contract of sale to purchase the home.

The unit is a one-unit property, duplex, town/row house or a single dwelling unit in a cooperative or condominium. A home in a planned use development, a loft or live/work unit, or a manufactured home to be situated on a privately owned lot or a leased pad in a mobile home park.

The unit has been inspected by the Indianapolis Housing Agency and by a qualified independent inspector designated by the family. The American Society of Home Inspectors (ASHI) or the National Association of Home Inspectors (NAHI) must certify the independent inspector to conduct home inspections.

The unit meets HUD's Housing Quality Standards and all requirements defined in this Administrative Plan.

The Indianapolis Housing Agency will not approve the seller of the unit if it has been informed that the seller is debarred, suspended, or subject to a limited denial of participation.

PHA Search and Purchase Requirements [24 CFR 982.629]

The Section 8 rental assistance will continue under the terms of the participant's rental agreement until a home is found to purchase. As required by HUD, the Indianapolis Housing Agency has established the maximum time that will be allowed for a family to locate and purchase a home. The family's deadline date for locating a home to purchase will be 180 calendar days from the date the family's eligibility for a home loan is approved. The family must purchase the home within 90 calendar days of locating a home to purchase.

These time limits do not apply to disabled or elderly participants.

Inspection and Contract [24 CFR 982.631]

The unit must meet Housing Quality Standards, and must also be inspected by an independent professional inspector selected and paid by the family.

The independent inspection must cover major building systems and components. The inspector must be qualified to identify physical defects and report on property conditions, including major building systems and components. These systems and components include, but are not limited to:

Foundation and structure;

Housing interior and exterior;

Roofing;

Plumbing, electrical and heating systems.

The independent inspector must not be an Indianapolis Housing Agency employee or contractor. The Indianapolis Housing Agency will not require the family to use an independent inspector selected by the Indianapolis Housing Agency. The Indianapolis Housing Agency requires that the inspector is a member of the American Society of Home Inspectors (ASHI) or National Association of Home Inspectors (NAHI) certified to conduct residential home inspections.

Copies of the independent inspection report will be provided to the family and the Indianapolis Housing Agency. Based on the information in this report, the family and the Indianapolis Housing Agency will determine whether any pre-purchase repairs are necessary.

The family must enter into a contract of sale with the seller of the unit. A copy of the contract must be given to the Indianapolis Housing Agency. The contract of sale must specify the price and terms of sale, and provide that the purchaser will arrange for a pre-purchase independent inspection of the home. The contract must also:

Provide that the purchaser is not obligated to buy the unit unless the inspection is satisfactory;

Provide that the purchaser is not obligated to pay for necessary repairs; and

Contain the seller's certification that he or she has not been debarred, suspended or subject to a limited denial of participation.

Financing [24 CFR 982.632]

The family is responsible for securing financing. The Indianapolis Housing Agency has established financing requirements, listed below, and may disapprove proposed financing if it is determined the that the debt is unaffordable.

The Indianapolis Housing Agency will prohibit the following forms of financing:

- Balloon Payment Mortgages
- Seller Financing
- Land Contracts
- Package Loans
- Wrap-Around Loans

Continued Assistance [24 CFR 982.633]

Homeownership assistance may only be paid while the family is residing in the home. The family or lender is not required to refund homeownership assistance for the month the family moves out.

The family must comply with the following obligations in order to continue to receive homeownership assistance:

The family must comply with the terms of the mortgage securing debt incurred to purchase the home, or any refinancing of such debt.

The family may not convey or transfer ownership of the home, except for purposes of financing, refinancing, or pending settlement of the estate of a deceased family member. Use and occupancy of the home are subject to CFR 982.551 (h) and (i).

The family must supply information to the Indianapolis Housing Agency or HUD as specified in CFR 982.551(b). The family must further supply any information required by the Indianapolis Housing Agency or HUD concerning mortgage financing or refinancing, sale or transfer of any interest in the home, or homeownership expenses.

The family must notify the Indianapolis Housing Agency before moving out of the home.

The family must notify the Indianapolis Housing Agency if the family defaults on the mortgage used to purchase the home.

No family member may have any ownership interest in any other residential property.

The family must attend and complete ongoing homeownership counseling.

Before commencement of homeownership assistance, the family must execute a statement in which the family agrees to comply with all family obligations under the homeownership option.

Maximum Term of Homeownership Assistance [24 CFR 982.634]

Except in the case of elderly or disabled families, the maximum term of homeownership assistance is:

15 years, if the initial mortgage term is 20 years or longer, or

10 years in all other cases.

The elderly exception only applies if the family qualified as elderly at the start of homeownership assistance. The disabled exception applies if, at any time during receipt of homeownership assistance, the family qualifies as disabled.

If the family ceases to qualify as elderly or disabled during the course of homeownership assistance, the maximum term becomes applicable from the date assistance commenced. However, such a family must be afforded at least 6 months of homeownership assistance after the maximum term becomes applicable.

Homeownership Assistance Payments and Homeownership Expenses [24 CFR 982.635]

The monthly homeownership assistance payment is the lower of the voucher payment standard minus the total tenant payment, or the monthly homeownership expenses minus the total tenant payment.

In determining the amount of the homeownership assistance payment, the Indianapolis Housing Agency will use the same payment standard schedule, payment standard amounts, and subsidy standards as those described in this plan for the Housing Choice Voucher Program. The only exception shall be that of unit size, which is established at time of home purchase, and will not alter during the time of homeownership assistance.

The Indianapolis Housing Agency will pay the homeownership assistance payment to the lender via electronic payment transfer.

Some homeownership expenses are allowances or standards determined by the Indianapolis Housing Agency in accordance with HUD regulations. These allowances are used in determining expenses for all homeownership families and are not based on the condition of the home.

Homeownership expenses include:

- Principal and interest on mortgage debt.

- Mortgage insurance premium (if required by lender or paid by homeowner).

- Taxes and insurance.

- The Indianapolis Housing Agency utility allowance used for the voucher program.

- The Indianapolis Housing Agency allowance for routine maintenance costs equal to \$50.00 per month.

- The Indianapolis Housing Agency allowance for major repairs and replacements equal to \$50.00 per month.

- Principal and interest on debt for improvements.

If the home is a cooperative or condominium, expenses also include operating expenses or maintenance fees assessed by the homeowner association.

Portability [24 CFR 982.636, 982.353(b) and (c), 982.552, 982.553]

Subject to the restrictions on portability included in HUD regulations and in Chapter 13 of this plan, the family may exercise portability if the receiving housing authority is administering a voucher homeownership program and accepting new homeownership families.

The receiving housing authority may absorb the family into its voucher program, or bill the Indianapolis Housing Agency. The receiving housing authority arranges for housing counseling and the receiving agency's homeownership policies apply.

Moving With Continued Assistance [24 CFR 982.637]

A family receiving homeownership assistance may move with continued tenant-based assistance. The family may move with voucher rental assistance or with voucher homeownership assistance. Continued tenant-based assistance for a new unit cannot begin so long as any family member holds title to the prior home.

The Indianapolis Housing Agency prohibits more than one move by the family during any one-year period.

The Indianapolis Housing Agency will deny permission to move with continued rental or homeownership assistance if it is determined that there is insufficient funding to provide continued assistance.

The Indianapolis Housing Agency will require the family to complete additional homeownership counseling prior to moving to a new unit with continued assistance under the homeownership option.

Denial or Termination of Assistance [24 CFR 982.638]

The Indianapolis Housing Agency will terminate homeownership assistance if the family is dispossessed from the home due to a judgment or order of foreclosure.

The Indianapolis Housing Agency will permit such a family to move with continued voucher rental assistance. However, rental assistance will be denied if the family defaulted on an FHA-insured mortgage, and the family fails to demonstrate that:

The family conveyed title to the home as required by HUD, and

The family moved within the period required by HUD.

The Indianapolis Housing Agency will terminate homeownership assistance if the family:

Transfers or conveys ownership of the home;

Fails to provide requested information to the Indianapolis Housing Agency or HUD;

Fails to notify the Indianapolis Housing Agency before moving out of the home;

Fails to use the assisted homeownership unit for residence by the family. The homeownership unit must be the family's only residence;

Leases or rents out the homeownership unit;

Commits any fraud, bribery or any other corrupt criminal act in connection with the program;

Engage in drug-related criminal activity, or violent criminal activity (I.A.W. 24 CFR §982.553);

An assisted family, or members of the family may not receive Section 8 tenant-based assistance (including homeownership assistance) for the same unit or for a different unit, under any duplicative (as determined by HUD or in accordance with HUD requirements) federal, state or local housing assistance program.

Failure to comply with the Family Obligations Under the Section 8 Program or IHA Home Ownership policies.

IHA shall have the discretion to waive or modify any provision of the Homeownership Supportive Services Program or policies not governed by the statute of regulation for good cause or to comply with changes in HUD regulations or directives.

PROJECT BASED ASSISTANCE ADDENDUM

Project Based Assistance

Project-based vouchers for existing units are component of the Indianapolis Housing Agency's Housing Choice Voucher Program. Initially, the Indianapolis Housing Agency will make 600 of its vouchers available for assistance to specific existing housing units if the owner agrees to set-aside a portion of the units in an existing development specifically for tenants who meet the income limits and other requirements of the Indianapolis Housing Agency's Housing Choice Voucher Program.

Families may apply directly at the approved Project Base sites for available units. Owners select families for occupancy of a particular unit after screening each family the family must then be referred to and approved by the IHA.. Each month, the Indianapolis Housing Agency pays the owner the difference between 30 percent of adjusted family income and the gross rent of the unit.

Under the project-based voucher program for existing units, the IHA enters into an assistance contract with the owner for specified units and for a specified term. The IHA and the owner execute an agreement to enter into housing assistance payments (HAP) contract for up to a ten-year term that is dependent on availability of funding under the IHA's ACC with HUD. The HAP contract establishes the initial rents and describes the responsibility of the PHA and the owner. Rents are set based upon market comparable units and may not exceed 110% of the published existing housing fair market rents. In addition, the HAP contract establishes the minimum housing quality standards that all units must meet before assistance can be paid on behalf of a family. These standards must be maintained throughout the term of the assisted tenancy.

The IHA will project-base vouchers for an existing property only if the contract is consistent with the IHA's goal of deconcentrating poverty and expanding housing and economic opportunity. The IHA requires all new contracts to the project-based voucher assistance program be for units in census tracts with poverty rate and minority concentration of less than 20 percent.

Specific Participation Requirements

1. To be considered for participation, at a minimum, the applicant must meet threshold requirements. The IHA will evaluate and rate all applications for assistance that meet the threshold requirements and rating factors for award described in the Application for Section 8 Project-Based participation for existing housing. Threshold requirements for participation are:
 - Proven Ownership of proposed property.
 - Certification of previous compliance with Fair Housing and Civil Rights Laws; and
 - Certification that the applicant has not been deemed ineligible for participation in Federal and IHA programs.
 - Property must be located in a census tract with a poverty and minority concentration rate of less than 20 percent.

Applications that meet threshold criteria will be further rated based on proven management experience, property maintenance expertise, financial responsibility, and condition of property.

2. Investment of funds in property—The IHA will project-base voucher assistance without any requirement that the owner invest other funds in the property.
3. Income Mix—No more than 25 percent of the units in a building may receive project-based voucher assistance. Single-family dwellings are exempt from the 25 percent limit. A building with up to four units is considered a single-family dwelling.
4. Resident Choice and continued assistance—Families occupying units with project-based voucher assistance have the right to move after one year with tenant-based voucher assistance, a family that is referred to IHA

from the owners' site based must replace it. This will ensure that the specified number of subsidies continue to be used and the development throughout the term of the IHA's contract with the owner.

5. All selected applicants must sign a HAP Contract.
6. Contract Term and extension—The IHA has the discretion to set the initial contract term for any period of time up to a maximum of ten years, subject to the availability for adequate annual appropriations. The initial contract may be extended for the period that the IHA considers appropriate to achieve long-term affordability or to expand housing opportunities. At the IHA's option, the initial contract may bind the owner to accept extensions offered by IHA.
7. HQS and Inspections—Each unit identified to receive project-based assistance must pass an HQS inspection before a Hap contract can be signed, project based voucher contracts are subject to the same annual inspection requirements as regular vouchers, except that the IHA is permitted to develop a streamlined inspection system for the development rather than inspecting each unit each year.
8. Rent - The IHA's contract with the owner sets the rent for each unit with project-based assistance. The amount of the rent may not exceed the lower of the applicable minimum level, as explained below, or the "reasonable" rent in light of the rents charged for comparable unassisted units in the area. The applicable maximum is the maximum voucher payment standard which is 100 percent of the HUD-determined fair market rent (FMR). Up to this maximum, the rent for a unit is allowed as long as the rent is reasonable.
9. Rent Increases - Rent increases during the term of the contract may be approved by the IHA so long as the increased rents do not exceed the above rent limits and are reasonable. HUD's annual adjustment factor does not apply.
10. Family Share of the Rent – Families with project-based vouchers pay a flat 30 percent of their adjusted income for rent and utilities.
11. Wait List—The individual project base sites maintain their wait lists for project based voucher assistance. Owners are responsible for selection of tenants for units assisted with project-based vouchers from among the families on their wait list. No family is required to accept project-based assistance. Families that reject an offer of project-based assistance or are rejected by the owner and are on the tenant-based list retain their place on that list.
12. Targeting—Tenant-based voucher eligibility and targeting rules apply to project-based assistance for existing housing. This means that the income of families selected for project-based voucher units is considered in determine whether the IHA has complied with the requirement that at least 75 percent of the new admissions to the voucher program each year must have incomes at or below 30 percent of the area median income.
13. Vacancy Payments—As an incentive for owners to enter into project-based contracts, the IHA will offer vacancy payments to owners. Vacancy payments are limited to 60 days. However, the IHA and owners must seek to reduce the need for vacancy payments, and such payments will not be made if the vacancy is the fault of the owner (e.g. the unit does not pass reinspection or IHA refers at least three families to the owner, but the owner refused to select any of them). The IHA has discretion to reduce the number of units under a project-based voucher contract if no family accepts a unit within 120 calendar days of the owner's notice to the IHA of the vacancy. The IHA will then reissue the subsidy as a tenant-based voucher.
14. Location—The IHA will issue project-based vouchers for a property only if the contract is consistent with the goal of deconcentrating poverty and expanding housing and economic opportunities. The IHA requires that all new contracts to project-based voucher assistance must be for units in census tracts with poverty rate and minority concentration of less than 20 percent.

Family Self Sufficiency Plan

Overview

The Indianapolis Housing Agency (IHA) is committed to establishing and implementing a Family Self-Sufficiency (FSS) Program to help families who receive housing assistance achieve economic independence by utilizing an array of public and private resources. By coordinating housing assistance with needed services such as child care, education and job training/development, IHA assists both public housing and housing choice voucher participants to reach their goals of economic independence and self-sufficiency. The objective of the FSS program is to reduce the dependency of low-income families on welfare assistance and on the Housing Choice Voucher Program, Public or Indian Housing assistance or any Federal, State or local rent or homeownership subsidies. Under the FSS program, low-income families are provided opportunities for education, job training, counseling and other forms of social service assistance, while living in assisted housing, so that they may obtain the education, employment, business and social skills necessary to achieve self-sufficiency. Any resident or housing assisted participant with a sincere desire to achieve self-sufficiency is assisted to perform a self-assessment to identify personal motivating factors as well as the family's strengths and barriers relative to achieving self-sufficiency. IHA then assists participants to work their plans, providing emotional support during challenging times. At each step in the process, IHA helps participants to motivate themselves and to improve their self-esteem. Public/assisted housing is envisioned as serving two divergent populations. First, it provides a safety net for the elderly, handicapped and disabled whose biological, physical, or mental conditions will not permit entry or re-entry into the labor market. Second, public housing was, and still is, intended as a temporary resource for families who temporarily remain outside the workforce. IHA has targeted the female-head of family with small children at home; those faced with temporary dislocation from the labor market; those who are involuntarily without the means to provide housing for their families; and, those whose present incomes are inadequate to otherwise provide decent, safe, and sanitary housing in the existing housing market. The purpose of the Family Self-Sufficiency (FSS) Program is to promote the development of local strategies to coordinate the use of public housing assistance and housing assistance under the Housing Choice Voucher Program with public and private resources, to enable families to receive assistance under these programs to achieve economic independence and self-sufficiency. Under FSS, families are required to sign a Contract of Participation, which includes an Individual Training and Services Plan entered into between the housing agency and those members of the family who will be participating in the FSS program. The Contract of Participation is usually effective for a period of five years but can be extended for a period of two years for "good cause." A major benefit of participating in the FSS program is recognized when the family transitions to employment or has an increase in earned income. If the family is a housing choice voucher recipient, the increased income can be used to calculate and establish an escrow savings account. The funds saved can be used by the families for expenses such as homeownership or advanced educational opportunities. A key component of FSS is the establishment of the Program Coordinating Committee (PCC). The PCC is responsible for overall implementation of the program including assistance in developing the Family Self-Sufficiency Program Action Plan and securing commitments of public and private resources for the operation of the program.

The FSS program is administered at IHA by staff of the Department of Resident Relations, working in close collaboration with the Program Coordinating Committee representing key community institutions; many who will be providing services to FSS participants. A cornerstone of this program is the multi-disciplinary review and coordination of family strategies through the PCC and the leveraging of community resources such as social service programs, human resources and other financial resources from both the public and private sectors to support family goals. The basic objectives of IHA's Family Self-Sufficiency Program are as follows:

- Provide low-income families with basic life skills, educational advancement, academic and vocational counseling, job training/search activities, which leads to successful employment referral and placement.
- Assist families to make the transition from "welfare to work" by providing job training, support and employment search services.
- Decrease the length of time families stays in public/assisted housing.
- Provide adequate social and support services, as client needs dictate.

There are also certain basic programmatic assumptions that must be considered when implementing an FSS program.

Except for those who cannot be expected to work full-time due to circumstances beyond their control (i.e. age, health or physical ability), every family in public and subsidized housing will be made aware of FSS and encouraged to undertake the transition to the private housing market within a reasonable period of time after entering assisted housing.

Every family accepted in the FSS program accepts responsibility for seeking to achieve the objective of preparing themselves for the return to unsubsidized living arrangements.

In implementing the FSS program, the service provider's makes a commitment through a Memorandum of Agreement to assist the participating family in preparing themselves for the transition to unsubsidized housing. Such a commitment implies that sufficient jobs are, or will be, available to consistently employ people at wages adequate to support families at a standard of living above the maximum allowable for receiving assistance; and, Each family will demonstrate a uniquely different set of needs and concerns, which will demand unique strategies for addressing those needs.

- Local agencies administrating needs-based programs are able to determine how best to respond to the unique needs of the families within their jurisdiction and should be given flexibility in applying the rules and regulations in order to meet the unique needs of individual families.
- It is not unusual for former public assistance recipients to fail in their first attempts to secure employment, which means the FSS program must provide intensive focus on both job retention issues and facilitating multiple placements (career pathways) for residents until the job "fit" is right.

Program Management

The Family Self-Sufficiency Program is managed by IHA's Office of Resident Relations (ORR). This office coordinates the day-to-day activities of the program and the Director of ORR reports directly to the Executive Director of the Indianapolis Housing Agency. The overall mission of this office is to provide support and address the job readiness, job training and placement and human service needs of public housing residents and Housing Choice Voucher program participants. Through these expanded efforts, IHA aims to improve the economic self-sufficiency of working adults, promote the academic achievement and career development of youths and maximize the extent to which seniors can live healthy and independent lives.

To support the Agency's Family Self-Sufficiency efforts, IHA staffs the program with seven full-time staff, a Program Coordinator, four FSS Case Managers, one Recruiter and a HOPE VI Representative. The FSS Case Managers are responsible for identifying and assessing family skills and needs by utilizing interviews, written assessment tools and home visits. They utilize the Individual Training and Services Plans, an integral part of the Contract of Participation. They provide ongoing monitoring and support to families in meeting their goals and advocate for services as needed. They also work with other IHA staff to insure FSS families are in compliance with their housing assistance.

Although the Office of Resident Relations (ORR) assumes responsibility for organizing the Family Self-Sufficiency Program, the Program Coordinating Committee (PCC) links housing, job training and apprenticeships, family and individual counseling, drug and alcohol treatment and counseling and career development with subsidies for food stamps, Medicaid, child care and other transfer payments in a more consistent and coordinated manner. In addition, the PCC coordinates services in conjunction with the changing federal "Welfare to Work" legislation.

The PCC, along with ORR and Family Self-Sufficiency staff, make recommendations concerning policy and regulatory adjustments in the administration of the program. The Committee is involved with the implementation in the following manner:

- Assistance in securing educational advancement, supportive services and employment opportunities in the public and private sectors.
- Providing linkages with regard to home ownership for the participants.

In addition, one of the major functions of the PCC is to determine what resources are needed and available in the community that can be mobilized to service FSS participants. As new providers are recruited by the Housing Agency and the PCC, additional families may be served.

The Family Investment Center (FIC), located at the Laurelwood Family Housing Development, is one of the focal point of IHA's Family Self-Sufficiency Program. The primary objectives of the Family Investment Center are to provide the support and resources needed by public housing and housing choice voucher families to successfully complete all aspects of their FSS Action Plan (s), to obtain jobs and move to economic self-sufficiency. IHA has assembled a service team of local service providers who have located staff and program resources at the FIC. In addition, linkages have and will continue to be established with many other local initiatives, which share similar goals.

The Indianapolis Housing Agency enjoys cooperative relationships with a variety of agencies and has been able to enlist commitments from a number of the major providers of services to low-income families as well as those currently on public assistance. Support from such service providers is essential if IHA is to assist FSS families meet their goals.

Family Demographics

The Indianapolis Housing Agency's Family Self-Sufficiency Program is designed to increase the availability for those most in need of subsidized housing by assisting families already receiving housing assistance in making the transition back into the private housing market. FSS seeks to accomplish this by providing the opportunity for low-income families to achieve their goals of economic and social independence through employment and home ownership or some other non-subsidized living arrangement. To accomplish these objectives, the families' eligible for consideration for FSS must live in either public or subsidized housing. The head of household in the target universe for IHA's Family Self-Sufficiency Program will be 90% female and 10% male. The following breakdown of IHA's target population is by race and ethnicity.

Analysis of Required Supportive Services

To identify the ever changing needs of IHA's potential FSS families, the Indianapolis Housing Agency periodically sends survey letters to all Housing Choice Voucher participants and conducts needs assessment with public housing residents in each of the agency's housing developments. Housing Choice Voucher families are asked to answer questions soliciting information about why they are interested in the program and what supportive services they feel are needed.

Estimate of Participating Families

IHA provides supportive services to 577 families, with an initial breakdown of 497 Housing Choice Voucher participants, and 80 public housing families. This figure is based upon available resources including Housing Choice Voucher Administrative fees, ROSS grant, EDSS grant, HOPEVI program, federal operating reserves as well as the scope of supportive services needed to assist potential FSS families that have already been secured.

Based upon the results of survey letters sent to all eligible Housing Choice Voucher families and the needs assessments conducted with public housing residents, IHA will continue to expand its base of services and agency involvement to service additional families who have other identified needs.

PROGRAM SIZE

Because of staff reductions our mandatory program size of 831 has been reduced. IHA will continue to review and work toward the Quality Housing and Work Responsibility Act of 1998 Relative to future program size and any modifications will be approved by the Board of Commissioners and sent to HUD for approval.

ELIGIBLE FAMILIES FROM OTHER SELF-SUFFICIENCY PROGRAMS

FSS recruitment efforts will be directed towards Housing Choice Voucher residents, Public Housing Residents, FIC participants and HOPE VI participants.

FSS Family Selection Procedures

PROGRAM REQUIREMENTS

FSS is a voluntary program for Housing Choice Voucher and Public Housing residents. FSS is aggressive in their recruitment efforts, such as, attending Housing Choice Voucher briefings and having participants sign a pre-application with follow-up at the time the Request for Lease Approval is returned and signature on the Contract of Participation at time of lease up. Public Housing residents and FIC participants sign a Contract of Agreement when the resident makes contact with FSS. HOPE VI participants sign a Contract of Agreement upon lease up.

- Participants must complete an Individual Training and Services Plan (ITSP) and agree to fulfill all requirements of the family needs assessment in any areas identified.
- It is beneficial for the head of household to have an eighth grade reading level and be ready to complete high school, Technical Course or GED requirements.
- Participants should agree to sign authorizations for release of children's school records and agree to services in any areas identified.
- All family members over 18 should be willing to participate in educational and employment assessments.
- Participants shall demonstrate commitment by keeping all scheduled appointments, such as the 90-day case reassessment.
- Head of household must be a tenant in good standing according to the terms of their housing program regulations and/or lease.
- Adult public housing residents must participate for at least 8 hours per month in community service or economic self-sufficiency program.

Application Process

Families in the FSS Program are asked to complete an FSS Application Form, which indicates their interest in providing household information necessary to initiate consideration. This form also acts as a release of information document so that staff may initiate discussions with other needs-based programs regarding benefits the family may be receiving or be eligible for under the new program. The FSS Application also permits FSS staff to review the family's tenant folder in order to complete the Contract of Participation. An FSS Case Manager is assigned to the applicant at this time.

Once a family has submitted the Application, staff reviews all available information concerning family composition, income, service needs and other relevant factors. The case manager, in conjunction with the family, begins to complete the Individual Training and Services Plan and the family specific Contract of Participation. At this stage, the adult members may also participate in educational testing and job skills identification exercises to assess the employability level of the designated head of household, individual service needs of each family member and what services and agencies, if any, will be needed by the family. This second interview may take place in the applicant's home.

The completion of the Contract of Participation and Individual Training and Services Plan are finalized with the approval of the Program Coordinator. Upon approval, the case manager and FSS participant discuss the final goals and the Contract is signed.

If all available slots are filled before the list of families interested is exhausted, those remaining will be placed on a wait list and will be offered a slot if a participating family leaves the program or, if IHA determines it has the capacity to increase program size. Family selection from the wait list shall be accomplished (1) through the use of a lottery system; (2) based upon the length of time the family has resided in public housing; or, (3) date the family expressed an interest in the FSS program.

IHA believes that motivation of families is key to ensuring the participant family is interested in the FSS program. A family must attend an FSS orientation or briefing as well as pre-selection interviews and submit to a home visit. By requiring the family to complete certain tasks, such as the FSS application and family assessment, IHA is providing an opportunity to measure the family's willingness to undertake the obligations, which will be required under the Contract of Participation. *It is important to note that the families based upon their educational level and disabilities, if applicable must accomplish all motivational tasks given to FSS families.* As an example, a requirement that a participant write a paragraph indicating willingness to join the program should not become an obstacle if the individual does not have the ability to complete this task. Instead, the participant should be given the opportunity to tell you orally why he/she is interested in the FSS program. *Reasonable accommodations must be made for individuals with mobility, manual, sensory, speech impairments, mental or developmental disabilities.* Prohibited motivational screening factors include the family's educational level, educational or standardized motivational test results, previous job history or job performance, credit rating, marital status, number of children, or other factors such as sensory or manual skills, and any factors which may result in discriminatory practices or treatment toward individuals with disabilities or minority or non-minority groups.

In all cases, IHA will be cognizant to ensure FSS selection is accomplished without regard to race, color, religion, sex, handicap, familial status or national origin.

Incentives to Encourage Participation

- Developing a comprehensive incentive plan is key to selling the benefits of FSS to housing assisted families during recruitment efforts. As a result, IHA has integrated the following incentives:
- Assignment of a FSS Case manager that will oversee the family's progress towards successfully completing the program. *Intensive case management is the single most important element of a successful self-sufficiency program.*
- Establishment of participant escrow accounts so that families can save money for homeownership, further education or other specified purposes. Funds from the escrow account are normally disbursed to the family upon completion of the Contract of Participation.
- Priority placement in other IHA funded supportive service programs such as those provided by the Family Investment Center.
- Access to a wide range of supportive services such as the computer lab, adult education and training, jobs database and family health programs.
- Customized needs assessments and skills aptitude assessments so that family members can develop realistic, attainable employment goals.
- Intensive support and counseling in job readiness, search and initial employment phases. Ongoing activities include resume development, interviewing skills, time management and other skills identified as necessary for the individual participant to secure employment.
- Priority in WIA funded programs.
- Monthly public relations/media stories shall be used to give the program a positive identity for participants.
- Other incentives will continue to be identified and added to IHA's Family Self-Sufficiency Program.

Outreach Efforts

Program outreach and recruitment is an ongoing component on FSS and is conducted in the following manner. All eligible families living in public or assisted housing are informed of the FSS program through media campaigns, information presented at Resident Organization meetings, newsletters, direct mailings and homeownership enrollments. *Every attempt will be made to insure that all families, regardless of race, color, religion, sex, handicap, familial status or national origin, within the targeted universe are aware of the program and have the opportunity to participate.* After exhausting the list of existing Housing Choice Voucher participants and public housing residents, IHA intends to notify applicants on the wait lists that are near receiving their housing subsidy.

FSS staff, in conjunction with the Office of Resident Relations, conducts FSS informational meetings on a regular basis to current, future and prospective Public housing residents and Housing Choice Voucher participants as well as attending Housing Choice Voucher briefing sessions for new program participants. Residents are also able to schedule individual meetings with FSS staff to answer family specific questions. During the informational meetings, potential applicants are informed of program incentives and requirements. Staff try to interest and motivate residents

about FSS by emphasizing the connection between recent changes in federal and state welfare rules and the potential benefits of FSS participation including escrow savings and individual family support services.

The informational meetings give families an insight into the program and applications are available for potential applicants at the meetings. *FSS staff also encourage families to participate in educational, job training and employment opportunities being offered regardless of their status in the FSS program.*

One of the most successful methods of FSS recruitment into the self-sufficiency program occurs through peer networking/counseling. As families begin to reap the benefits of FSS, they share their experiences with other residents, which increases the credibility of the program. In other words, *a successful FSS program also sells itself.*

FSS Activities and Supportive Services

PROGRAM STRUCTURE

It is the expressed purpose of the Family Self-Sufficiency Program to assist low-income families achieve the American dream of true upward mobility. The application, needs assessment and selection steps previously detailed are designed to ensure that each FSS participant has a solid, achievable plan for economic self-sufficiency backed by appropriate supportive services. The FSS Program seeks to accomplish this through two different levels of assistance to each family who participates in the program. The first of those levels (Remediation Stage), seeks to address barriers to successful achievement resulting from educational and/training deficiencies. The second level (Transitional Stage), seeks to build upon the first level by providing opportunities for financial and investment counseling, homeownership and budgeting seminars, minor repair and maintenance training and other experiences which enhance their probability of success once they have made the transition. It should be noted the Welfare Reform legislation, which established timelines for Temporary Assistance for Needy Families (TANF) to receiving TANF benefits.

A. Remediation Stage

The first phase of FSS is characterized as the Remediation Stage during which time an Individual Training and Service Plan (ITSP) is established for each adult member of the household. This phase may last up to two years (this stage may be extended provided IHA finds good cause exists for granting such extension). This extension ensures that each participant is ready to move on to the Transitional Stage. No participant should fail due to lack of time allowed in the early stages of their educational/training plan. During this extension, all members of the household work towards completing the Individual Training and Service Plan. These commitments, plus those of the Indianapolis Housing Agency to the family, will be finalized as part of the ITSP between the family and the Authority. The provisions of the Individual Training and Services Plan are as follows:

- Commitments by IHA to make available the resources and services described in the Individual Training and Services Plan.
- Agreement by the family to participate in the programs and activities prescribed by the ITSP.
- A statement indicating the participant's rights to request an extension of the Remediation Stage provided that IHA finds that good cause exists for granting the extension.
- A termination statement indicating that failure to complete the commitments in the ITSP will cause the family to be terminated from the FSS program at the end of the Remediation Stage.

In order to assist the family in identifying and overcoming the barriers to re-entry into labor and private housing markets, diagnostic and employability analyses is undertaken during the waiting period and prior to formal participation in the program. The Individual Training and Services Plan is developed by the program staff, in conjunction with the head of household, prior to formal program participation. This plan serves as a contract between the program and the family regarding each party's responsibilities and understandings regarding the implementation of the plan and is attached as an Exhibit to the Contract of Participation at the start of the program. The Individual Training and Services Plan may be modified at any time by written agreement of all parties.

During the Remediation Stage, program staff, in conjunction with staff from other needs-based or state and federally funded programs (IPIC, Workforce Development, Goodwill), work with the family to implement the plan. Activities to assist the family might include:

- Remedial education and literacy classes
- High school completion or equivalency
- Job training and preparation
- Pre-employment/personality development
- Health/dental
- Child care
- Transportation
- Life management skills
- Substance abuse treatment and counseling
- Family services
- Homemaking skills and parenting
- Money management
- Investment counseling

The Remediation Stage is included to provide an opportunity for families to receive the kinds of services, education and training which will move them from a marginal employment situation to one in which there is an opportunity for career advancement. Some families have genuine ambition but have been kept from obtaining an education or job training experience due to circumstances beyond their control. Some families may need minimal assistance and will be ready to enter the Transitional Stage within only a brief time after entry into the program and placement in the Remediation Stage.

B. Transitional Stage

At the end of the Remediation Stage, the family undergoes a reassessment and counseling to determine the probabilities of successful completion of the Transitional Stage. The family then signs a Contract Addendum spelling out the conditions under this next phase, including:

- A five year limitation on participation in the program, unless an extension has been granted from IHA, and their residency in assisted housing;
- A description of the manner in which rental payments will be calculated and the accumulations under an escrow savings account, as well as a description of the escrow savings account and the participant's access to such account at the end of the program consistent with 24 CFR 984.305 (please note, it is possible for families in the Remediation Stage to be employed and earning escrow savings as well);
- The participant's and IHA's obligations during the Transitional Stage; and,
- The conditions under which a family or person (Housing Choice Voucher and public housing), may terminate or be terminated from the FSS program.

The contract with the family ends if the family has completed their obligations under the Contract of Participation, including the requirement of each Individual Training and Services Plan and the condition that the head of each FSS family has obtained and maintained suitable employment and, for each participating FSS family that is a recipient of welfare assistance, a certification that they have been independent from such assistance at least one year before the expiration date of the term of the contract.

The Transitional Stage is designed to permit the family time to accumulate sufficient savings so that it will be able to either make a substantial down payment on a home or, otherwise, prepare for long term housing in the private rental market. During this stage, the program staff continues to provide counseling and supportive services to insure participant success once they leave the program. This stage covers a period not to exceed five (5) years (unless an extension is granted under the terms explained under the Contract of Participation), during which time the following will occur:

1. The head of household and/or adult family members will be expected to be engaged in full-time employment over the life of the contract. If unemployed at any time during the terms of the FSS

- Contract, the head of household should be expected to meet with IHA's Economic Development Coordinator.
2. Counseling and assistance in home ownership, money management, work habits, employee-employer relations, and other areas of problem solving will be provided families at monthly workshops or through individual counseling sessions, if necessary. Assistance will include further job training in more technical areas to improve employability and longevity on the job through training programs.
 3. FSS Housing Choice Voucher families pay rent to the owners in accordance with the normal procedures and IHA's housing assistance funds, paid by HUD, will be utilized for the FSS escrow deposit.
 - a. During the term of the FSS Contract of Participation, IHA calculates the escrow amount for each family using HUD's escrow credit worksheet. The amount of the escrow varies depending upon the income of the family and is only initiated when earned income increases after execution of the Contract of Participation.
 - b. "Escrow savings account" credits reflect the difference between earned income at the beginning of the Contract of Participation and any increase in earned income after this date. Assume that as of the effective date of the Contract, the total tenant payment is \$50, the contract rent to the owner is \$500, and the IHA housing assistance payment is \$450. One year later, the total tenant payment is \$150 (increase attributable to higher earned income), and the contract rent remains at \$500. In this case, the family pays the owner the \$150, IHA's housing assistance payment is still \$450, however, \$350 to the landlord and the monthly credit to the FSS escrow account is \$100.
 4. **If a family member becomes temporarily disabled or ill which results in a loss of income during the Transitional Stage, or if a family member loses his or her job as a result of general layoffs or plant closings or other reasons beyond the control of the individual, the Contract of Participation may be extended up to two years to reflect these circumstances beyond the family's control. However, if the disability is permanent, the family may be transferred back into a conventional housing program.**
 5. If a Housing Choice Voucher family decides that it does not wish to honor the terms of the Contract of Participation and drops out of the FSS program for reasons other than disability or if the family is terminated from the program for good cause as specified in the Contract, the escrow account will not be refunded and will be used to defray the costs of the program. In the case of a public housing resident, the amount of escrow will be returned to IHA as rent payment.
 6. Participating FSS families may request an Informal Hearing be held by IHA to consider whether the Housing Agency's decision to terminate supportive services and/or Section 8/public housing assistance as spelled out in the Contract of Participation is in accordance with the law, HUD regulations and any IHA administrative policies specified in the approved Housing Choice Voucher Program Administrative Plan. The hearing will be conducted by any person designated by IHA's Executive Director, other than the person, or a subordinate of such person, who made or approved the termination decision.
 7. It is anticipated that the PCC, in conjunction with local financial institutions and the Indianapolis Housing Agency, will advocate with local government the availability of low-interest loans for persons to purchase homes in the private market, and will also advocate for the provisions incentives to ensure the availability of moderately priced housing in the private market.

Activities and Supportive Services

As previously stated, IHA will coordinate FSS with their Family Investment Center (FIC) facility, located at the Laurelwood Housing Community. Public housing residents as well as IHA's Housing Choice Voucher program participants, will be encouraged to utilize the Center where they are able to obtain comprehensive "one stop" services related to job readiness, job training, job placement and general family development services including the Computer Learning Center's program activities. Families who come into the FIC will work with a Family Self-Sufficiency Case Manager to develop a family needs assessment; designed to address family development needs, promote economic self-sufficiency and link residents to existing job training and placement opportunities. All IHA families will be encouraged to utilize the Center and join the FSS program and sign a Contract of Participation. It is preferable that FSS Case Managers handle a maximum caseload of 40-50 families. Using a combination of funding sources including Housing Choice Voucher Administrative fees, operating reserves and federal grants such as

PHDEP, Family Investment Center Program and HOPE VI families will receive intensive FSS support each year from IHA.

To complement FSS services provided by Indianapolis Housing Agency staff, IHA relies on a number of cooperative relationships with a variety of agencies experienced with providing services to low-income families. Support from such private and public agencies is essential if IHA is to assist FSS families reach their goals. The FSS program has solicited support from federal, state and local governmental agencies and human service organizations in the greater Indianapolis area. The following is a sample of programs available to FSS families:

Community Outreach: Community organizing, resident orientation, technical assistance and organizational support to resident councils.

Family Support Services/Economic Development Programs: Family support programs, counseling, adult education, employment and training programs, Adult Basic Education (ABE), childcare, transportation, employment opportunities and homeownership activities.

Youth Development: Child care, on-site educational and recreational programs, teen peer leadership focusing on health issues, after-school health programs, adolescent health education programs, parenting classes, teen pregnancy prevention programs, adolescent violence prevention, youth job training and education, group and individual therapy, summer youth employment opportunities.

Drug Prevention, Education and Treatment: Community organizing, outreach and counseling programs, off-site intervention and treatment programs, substance abuse prevention training and family support services.

Recognizing the critical importance of computer literacy, the FIC facility includes a computer center, which has up-to-date personal computers and printers and a range of training software.

Major commitments for support have been received from Goodwill, INHP, and Workforce Development. These are the primary regional employment and training oversight agencies for the greater Indianapolis area administering WIA funds and a wide range of employment, training and job readiness initiatives including an extensive effort to support public assistance recipients move off welfare and into well-paying jobs. Workforce Development recognizes that IHA residents are a primary target population for welfare-to-work programs and intends to actively coordinate its planning efforts so that IHA's resident population needs and issues are carefully considered. Therefore, INET and IHA are focusing on TANF recipients in public housing and Housing Choice Voucher families.

Services to be provided by Service Providers are:

I. Workforce Development

Provides training and employment

II. INHP

Provides assessment, homeownership training and qualification for a mortgage loan

III. Goodwill

Provides case management, assessment, pre-employment instruction (1st Step), vocational skills training, ABE/GED preparation, job seeking instruction, placement assistance, and retention services. Placement with WIA programs.

IV. Habitat for Humanity

Provide new and renovated houses.

V. Training Inc.

Office skills training and life skills education

VI. Family Loan Program

Auto loans, auto repair loans, & 1st month rent and security deposit loans

VII. Westside Community Ministries Inc.

Provide computer training, adult education, survival skills for women, assist with temporary housing, day care, after school enrichment programs.

Method for Identification of Family Support Needs

There are several methods that are used to assist FSS staff identify the social service needs of the participants as well as deliver those services and activities to the families. First, the Housing Agency sends survey letters to all Housing Choice Voucher participants and conducts needs assessments in all public housing communities. The Housing Choice Voucher families are asked to answer soliciting information about why they are interested in the program and what supportive services they feel are needed. Based upon the results of the survey letter and the needs assessment, IHA expands its base of services and agency involvement. As previously discussed under *Outreach Efforts*, IHA also actively recruits for the program through a media campaign, information presented at Resident Organization meetings, newsletters and direct mailings. Additional information will be gathered during the completion of the FSS Application Form as well as during the testing that occurs when staff and potential FSS families complete assessment tools that are used to determine family goals as well as barriers to achieving self-sufficiency. Identification of initial family needs are identified in the Individual Training and Service Plan, which is incorporated in the Contract of Participation. Finally, FSS staff and the Program Coordinating Committee continue to gain an understanding of family needs as the program grows and they see first hand how each family has specific issues that must be addressed.

The delivery of services by IHA determines the success of the self-sufficiency program efforts. To accomplish this, IHA established an Office of Resident Relations that reports to the Executive Director of the Housing Agency. The agency's self-sufficiency program is administered by the FSS Program Coordinator, four (4) FSS Case Managers, one Recruiter, HOPE VI Representative, and an Economic Development Coordinator. It is the responsibility of the above staff to insure that services, which are committed by IHA, are available and delivered. Staff is responsible for identifying and assessing family skills and needs, utilizing interviews and written assessment tools. They develop the Individual Training and Services Plan (ITSP) and the Contract of Participation. Outside agencies such as Goodwill, INET and INHP may also provide assessment, development of the ITSP and case management services. The Case Managers maintain regular contact with their FSS families, which help build trust between the participants and the Housing Agency.

The FSS Program Coordinator executes the contract after receiving the assessment and ITSP from the family's caseworker. The Coordinator provides periodic monitoring and tracking of each FSS family. FSS staff provides ongoing monitoring and support to families in meeting their goals and advocate for services as needed. In addition, a 30-day initial case review up to 120 days case review system has been established to insure families are on track and meeting their obligations. FSS Case Managers maintain a working relationship with the service providers and take appropriate action if service delivery is not appropriate. They update and revise the service provider network if they are not meeting the needs of the FSS families. IHA utilizes both internal, including FSS participants and external resources to monitor program effectiveness.

Office of Resident Relations (ORR) has the responsibility for administering the Family Self-Sufficiency Program, the Program Coordinating Committee provides technical support of the program and the network of providers that has been assembled. The Program Coordinating Committee (PCC) links the services in a coordinated manner in conjunction with the changing federal and State "Welfare to Work" legislation.

Program Termination; Withholding of Services; and Available Grievance Procedures

The Contract of Participation may be terminated before the expiration of the term by any of the following:

- Housing Choice Voucher assistance is terminated.
- When IHA determines that the head of household or other participating family member has failed to fulfill the terms of the Contract of Participation, including compliance with the public housing lease or the Housing Choice Voucher lease, and any extension thereof.
- Failure of a Housing Choice Voucher family to comply with the contract requirements because the family has moved outside the jurisdiction of IHA.
- Withdrawal of the family from the FSS program.
- Mutual consent of both parties.
- By such other act as is deemed inconsistent with the purpose of the FSS program.
- By operation of law.

The FSS Contract of Participation provides that the family must comply with the assisted lease. Therefore, noncompliance with the Public Housing dwelling lease is grounds for termination. In the Housing Choice Voucher program serious and repeated violations of the lease are grounds for termination of assistance in the certification and voucher programs. Therefore, serious and repeated violations of the lease would be grounds for termination of the FSS contract as well as termination of housing assistance.

The Family Self-Sufficiency Program is geared to insuring that each participant realize their goals of economic independence and self-sufficiency and every effort will be made by the staff and Program Coordinating Committee to in power participants to reach self-sufficiency. As a result, the PCC has established the policy that ***“the option of withholding supportive services for contract violations will not be considered”*** since this may in fact compound family issues and further prevent the family from complying with their program requirements. If, however, the tenant continues on-compliant behavior, the staff may recommend termination from the program.

The decision to terminate a Housing Choice Voucher family from their housing assistance will be made by the Housing Choice Voucher Director in accordance with that program’s regulations. It is important to note that the Housing Choice Voucher Program is not required to terminate Housing Choice Voucher assistance as a result of removal from the FSS program. IHA may also temporarily suspend participation in the program to allow the family time to become compliant.

If IHA staff decide to terminate a families participation in the FSS program or Housing Choice Voucher assistance because the family has failed to comply with it’s FSS Contract of Participation, the Housing Agency will offer the family an Informal Hearing. The Informal Hearing allows the family the opportunity to consider whether the decision to terminate was done in compliance with FSS program rules as well as in accordance with any appropriate laws, HUD regulations or IHA’s approved or Housing Choice Voucher Administrative Plan. The Hearing will be conducted by any person or persons designated by IHA, other than a person who made or approved the termination decision or subordinate of such person.

Non-participating Families

Families in targeted Public Housing programs, such as: Hope VI can be terminated if they refuse to participate in the FSS program. The Housing Choice Voucher Program can terminate housing assistance to families with a signed CoP for not working on their goals.

Timetable for Program Implementation

IHA’s Family Self-Sufficiency Program began within 12 months of HUD’s initial approval of the FY’ 93FSS Incentive Award for Housing Choice Voucher units. Within this time frame, IHA hired an FSS Coordinator, who began outreach, participant selection and enrollment activities.

Indianapolis Housing Agency has completed enrollment of the total number of families required to be served under the FSS minimum program size of 1,082 and began delivery of supportive services within two years from the date of notification of approval of the application for new public units for a public housing FSS program or for new rental vouchers under the Housing Choice Voucher Program.

Certification of Coordination

The Family Self-Sufficiency Program operates under the direction of the Indianapolis Housing Agency’s Office of Resident Relations, which helps to insure close coordination and effective utilization of services.

The Indianapolis Housing Agency certifies that the development of the services and activities under the Family Self-Sufficiency Program has been coordinated with the Job Opportunities and Basic Skills (JOBS) Training Program under Part F of Title IV of the Social Security Act; the programs provided under the Job Training Partnership Act (JTPA); Workforce Investment Act (WIA) and any other relevant employment, child care, transportation, training and education programs in the greater Indianapolis area. IHA further certifies that implementation will continue to be coordinated in order to avoid duplication of services and activities.

Record Keeping and Program Evaluation

The key to determining whether the concepts and philosophies underlying the Family Self-Sufficiency Program outlined in this Action Plan are accurate and the program effective is found in the design of the project and the record keeping which will take place. The Indianapolis Housing Agency's intent is to insure that adequate baseline and process information will be available through which the program can be monitored and evaluated by the Family Self-Sufficiency Coordinator and others as approved by the Executive Director.

Attachment I

Admissions & Continued Occupancy Policy (ACOP)

INDIANAPOLIS HOUSING AGENCY

ADMISSIONS & CONTINUED OCCUPANCY POLICY

(A.C.O.P.)

This plan (ACOP) also serves as our “Tenant Selection and Assignment Plan (TSAP)” because, as set forth by HUD, it meets the requirements for a TSAP and provides the details as to how this Agency processes the selection and assignment of applicants for Public Housing.

The ACOP also includes the regulatory “One-Strike” provisions for admission to Public Housing and applicable sections of applicable sections of Title I of United States Housing Act of 1937 (42 U.S.C. §1437, *et. seq.*) as amended by § 511 of the Quality Housing and Work Responsibility Act of 1998. (24 C.F.R. § 903, Interim Rule.)

ADMISSIONS AND OCCUPANCY POLICY GOVERNING

HUD-Aided Low Rent Public Housing Operated by

The Indianapolis Housing Agency

SECTION I. INTRODUCTION

1. Mission Statement: Our mission is to be a *top performing* agency that:
 - Provides *quality* and *affordable* housing,
 - Contributes to *safe communities* and
 - Encourages *individual* and *family self-sufficiency*.
2. Purpose of Policy: The purpose of the policy Admissions and Continued Occupancy Policy, hereinafter referred to as “Policy”, is to establish guidelines for the Indianapolis Housing Agency (“IHA” or “Agency”) staff to follow in determining eligibility for admission to and continued occupancy of Public Housing. The basic guidelines for this Policy are governed by requirements of The Department of Housing and Urban Development (HUD), with latitude for consistent local policies and procedures.

The Policies and Procedures governing Admissions and Continued Occupancy are outlined in this policy and these requirements are binding upon applicants, residents and IHA alike. Notwithstanding the above, changes in applicable federal law or regulations shall supersede provisions in conflict with this policy.

Federal Regulations shall mean those found in 24 Code of Federal Regulations (CFR) Parts 900, *et. seq.*

3. Primary Responsibilities of IHA:
 - A) Informing eligible families of the availability of public housing assistance;
 - B) Determining and posting annually all utility allowances;
 - C) Receiving applications from families and determining their eligibility for assistance;
 - D) Inspecting Public Housing units to determine that they meet or exceed Housing Quality Standards;
 - E) Approving leases;
 - F) Collecting rent on a monthly basis from tenants;
 - G) Annual re-examinations of income, family composition, criminal backgrounds, and redetermination of rent;
 - H) Authorizing and processing evictions; and
 - I) Ongoing maintenance and modernization of the public housing inventory.
4. Objectives: The objectives of this policy are to:

- A) Promote the overall goal of drug free, decent, safe and sanitary housing by:
- 1) Insuring a social and economic mix of residents within each public housing community in order to foster social stability and upward mobility.
 - 2) Lawfully deny admission or continued occupancy to applicants or tenants whose presence in a public housing community are likely to adversely affect the health, safety, comfort or welfare of other residents or the physical environment of the community or create a danger to IHA employees.
 - 3) Insuring that Elderly families can live in public housing as long as they are able to live independently and/or have someone to help them live independently as in the case of a live-in aid.
- B) Facilitate the efficient management of IHA in compliance with Federal Regulations by establishing policies for IHA inventory and staff.
- C) Contribute to the Agency's fiscal responsibility.
- D) Comply in letter and spirit with Title VI of the Civil Rights Act of 1964, (42 U.S.C.§ 1601-6107: 24 C.F.R. part 146) and all other applicable Federal laws and regulations to insure that admission to and continued occupancy in public housing are conducted without regard to race, color, religion, creed, sex, national origin, handicap, or familial status.

5. Outreach: Disseminate as much information as possible about Public Housing through the local media (for example: newspaper, radio, television, etc.). For those who call with inquiries, the IHA office staff may be available to convey essential information.

- IHA may hold meetings with local social community agencies.
- IHA may sponsor "Open House" programs within the public housing communities to attract potential tenants to view a public housing apartment.
- IHA may make known to the public, through publications in a newspaper of general circulation as well as through minority media and other suitable means, the availability and nature of housing assistance for lower-income families. The notice shall inform families where they may apply for Public Housing. IHA shall take affirmative steps to provide opportunities for participation in the program to persons who, because of such factors as race, ethnicity, sex, age, or source of income, are less likely to apply for Public Housing. When there is a Local Housing Plan pursuant to Section 24 CFR, Part 91 (Comprehensive Housing Affordability Strategy (CIHAS)), IHA planned programs will be incorporated in the CIHAS.

SECTION II. FAIR HOUSING POLICY

It is the policy of IHA to comply fully with all Federal, State, and local nondiscrimination laws and in accordance with the rules and regulations governing The Fair Housing Act (42 U.S.C. § 2000d – 1 to 3535: 24 C.F.R. part 1), Equal Opportunity in housing and employment, and with the Americans with Disabilities Act of 1990 (42 U.S.C. § 1601-6107: 24 C.F.R. part 146)

Specifically, IHA shall not on account of race, color, sex, religion, creed, national or ethnic origin, familial status, disability or handicap, deny any family or individual the opportunity to apply for or receive assistance under HUD's Public Housing Programs, within the requirements and regulations of HUD and other regulatory authorities.

To further its commitment to full compliance with applicable Civil Rights laws, IHA will provide access to information to public housing residents regarding "discrimination". Also, this subject will be discussed during the briefing session and any complaints will be documented and made part of the applicant's/tenant's file.

SECTION III. PRIVACY RIGHTS

Applicants will be required to sign the Federal Privacy Act Statement that states what conditions and to whom HUD will release resident information.

All third party requests, for information involving an applicant or participant, must be accompanied by a release request, signed by an authorized applicant, in order for IHA to release any information involving an applicant or participant, unless disclosure is authorized under Federal or State law regulations. IHA may be compelled to release certain information pursuant to a valid legal process. However, IHA will reserve the right to defend these information requests if deemed necessary.
(Reference HUD Form 9886)

SECTION IV DECONCENTRATION RULE

1. The objective of the Deconcentration Rule for public housing units is to ensure that families are housed in a manner that will prevent a concentration of poverty families and/or a concentration of higher income families in any one development. The specific objective of the housing authority is to house no less than 40 percent of its public housing inventory with families that have income at or below 30% of the area median income by public housing development. Also the housing authority will take action to insure that no individual has a concentration of higher income families in one or more of the developments. To insure that the housing authority does not concentrate families with higher income levels, it is the goal of the housing authority not to house more than 60% of its units in any one development with families whose income exceeds 30% of the area median income. The housing authority will track the status of family income, by development, on a monthly basis by utilizing income reports generated by the housing authority's computer system.

2. To accomplish the deconcentration goals, the housing authority will take the following actions:
 - A) At the beginning of each housing authority fiscal year, the housing authority will establish a goal for housing 40% of its new admissions with families whose incomes are at or below the area median income. The annual goal will be calculated by taking 40% of the total number of move-ins from the previous housing authority fiscal year.

 - B) To accomplish the goals of:
 - 1) Housing not less than 40% of its public housing inventory on an annual basis with families that have incomes at or below 30% of area median income, and

 - 2) Not housing families with incomes that exceed 30% of the area median income in development that have 60% or more of the total household living in the development with incomes that exceed 30% of the area median income, the housing authority's Tenant Selection and Assignment Plan, which is a part of this policy, provides for skipping families on the waiting list to accomplish these goals.

SECTION V.

DEFINITION OF TERMS

Definitions are amended from time to time and are contained in Section 24 CFR, which are incorporated by reference including any subsequent amendments, as if fully set out herein.

1. Accessible dwelling units – When used with respect to the design, construction or alteration of an individual dwelling apartment, means that the apartment is located on an accessible route and when designed, constructed, altered, or adapted can be approached, entered, and used by individuals with physical handicaps. An apartment that is on an accessible route and is adaptable and otherwise in compliance with the standards set forth in 24 CFR §8.32 & §40 [the Uniform Federal Accessibility Standards] is “accessible” within the meaning of this paragraph.
 - When a specific individual is making an individual dwelling apartment in an existing facility accessible for use, the apartment will be deemed accessible when it meets the standards that address the impairment of that individual.
2. Accessible Facility – Means all or any portion of a facility other than an individual dwelling apartment used by individuals with physical handicaps. [24 CFR §8.21]
3. Accessible Route – For persons with a mobility impairment, a continuous unobstructed path that complies with space and reach requirements of the Uniform Federal Accessibility Standards. For persons with hearing or vision impairments, the route need not comply with requirements specific to mobility. [24 CFR §8.3 & §40.3.5]
4. Adaptability – Ability to change certain elements in a dwelling apartment to accommodate the needs of handicapped and non-handicapped persons or ability to meet the needs of persons with different types & degrees of disability. [24 CFR §8.3 & §40.3.5]
5. Allocation Plan – The plan submitted by IHA and approved by HUD under which IHA is permitted to designate a building or portion of a building for occupancy by Elderly Families or Disabled Families. [24 CFR §945]
6. Alteration – Any change in a facility or its permanent fixtures or equipment. It does not include: normal maintenance or repairs, re-roofing, interior decoration or changes to mechanical systems. [24CFR §8.3 & §8.23(b)]

7. Applicant – A person or a family that has applied for admission to public housing.
8. Area of Operation – The jurisdiction of IHA as described in State law and IHA’s Articles of Incorporation.
9. Assets – Assets means “cash (including checking accounts), stocks, bonds, savings, equity in real property, or the cash value of life insurance policies. “Assets do not include the value of personal property such as furniture, automobiles and household effects.” **IMPORTANT:** see the definition of Net Family Assets, for assets used to compute annual income. (see 24 CFR 913.102 for definition of Net Family Assets)
10. Auxiliary Aids – Means services or devices that enable persons with impaired sensory, manual, or speaking skills to have an equal opportunity to participate in and enjoy the benefits of programs or activities. [24 CFR §8.3]
11. Care attendant – A person that regularly visits the apartment of an IHA resident to provide supportive or medical services. Care attendants have their own place of residence (and if requested by IHA must demonstrate separate residence) and do not live in the public housing apartment. Care attendants have no rights of tenancy.
12. Co-head of household – A household where two persons are held responsible and accountable for the family.
13. Dependent – A member of the household, other than head, spouse, sole member, foster child, or live-in aide, who is under 18 years of age, or 18 years of age or older and disabled, handicapped, or a full-time student. [24 CFR §913.102]
14. Designated Family – Means the category of family for whom IHA elects to designate a community (e.g. elderly family in a community designated for elderly families) in accordance with the 1992 Housing Act. [24 CFR §945.105]
15. Designated Housing – A community(s), or portion of a community (ies) designated for elderly only or for disabled families only in accordance with the Housing Opportunity Program Extension Act of 1996.
16. Disabled Family – A family whose head, spouse or sole member is a person with disabilities. (Person with disabilities is defined later in this section.) The term includes two or more persons with disabilities living together, and one or more such persons living with one or more persons including live in aides determined to be essential to the care and well

being of the person or persons with disabilities. A disabled family may include persons with disabilities who are elderly. (24 CFR §945.105)

17. Displaced Person – A person displaced by government action or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise recognized pursuant to Federal disaster relief laws. This definition is used for eligibility determinations only. It should not be confused with the preference for involuntary displacement. (24 CFR §913.103)
18. Divestiture Income – Imputed income from assets disposed of by applicant or resident in the last two years at less than fair market value. (See the definition of Net Family Assets (24 CFR §913.103) in this section.)
19. Elderly Family – A family whose head or spouse (or sole member) is at least 62 years of age. It may include two or more elderly persons living together, and one or more such persons living with one or more persons, including live-in aides, determined to be essential to the care and well-being of the elderly person or persons. An elderly family may include elderly persons with disabilities and other family members who are not elderly. (24 CFR §945.10)
20. Elderly Person – A person who is at least 62 years of age. (24 CFR §945.105)
21. Extremely Low-Income Family – Extremely low-income family means a family whose Annual Income does not exceed 30% of the median annual income for the area, with adjustments for smaller and larger families, as determined by the Secretary of Housing and Urban Development (24 CFR § 5.603).
22. Family – Two or more persons (with or without children) regularly living together, related by blood, marriage, adoption, guardianship or operation of law who will live together in IHA housing; OR two or more persons who are not so related, but are regularly living together, can verify shared income or resources that will live together in IHA housing.
Buildings can also be designated for disabled families by following the requirements of the 1992 Housing Act. This entails preparing an allocation plan noting which buildings (if any) will be set aside for the disabled and preparing a supportive services plan. HUD approval is required for both the allocation and the supportive services plans.
23. Full-time student – A person who is carrying a subject load that is considered full-time for day students under the standards and practices

of the educational institution attended. Educational institution shall include but not be limited to: college, university, secondary school, vocational school or trade school (24 CFR 913.102).

24. Head of the Household – Head of the household means the family member (identified by the family) who is held responsible and accountable for the family.
25. Individual with handicaps, Section 504 definition [24 CFR §8.3] The Section 504 definitions of individual with handicaps and qualified disability with handicaps are not the definitions used to determine as defined later in this section. Note: the Section 504, Fair Housing, and Americans with Disabilities Act (ADA) definitions are similar. ADA uses the term “individual with a disability”.

Individual with handicaps means any person who has:

- a) A physical or mental impairment that:
 - substantially limits one or more major life activities;
 - b) has a record of such an impairment; or
 - c) is regarded as having such an impairment.
- d) For purposes of housing program, the term does not include any individual who is an alcoholic or drug abuser whose current use of alcohol or drugs prevents the individual from participating in the program or activity in question, or whose participation, by reason of such current alcohol or drug abuse, would constitute a direct threat to property or the safety of others.
- e) Definitional elements:
 - i) As used in this definition the phrase, “physical or mental impairment” means any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; muscular skeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genital-urinary; hemic and lymphatic; skin; and endocrine; or
 - ii) Any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term “physical or mental impairment” includes, but is not limited to, such diseases and conditions as orthopedic, visual, speech and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, drug addiction and alcoholism.

- iii) **“Major life activities”** means: functions such as caring for one’s self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working.
- iv) **“Has a record of such an impairment”** means: has a history of, or has been classified as having, a mental or physical impairment that substantially limits one or more major life activities.
- v) **“Is regarded as having an impairment”** means:
 - Has a physical or mental impairment that does not substantially limit one or more major life activities but that is treated by a recipient as constituting such a limitation;
 - Has a physical or mental impairment that substantially limits one or more major life activities only as a result of the attitudes of others toward such impairment; or
 - Has none of the impairments defined in this section but is treated by a recipient as having such an impairment.

26. Involuntary displacement – One of the local preferences for admission. [24 CFR §960.211(c), 960.213] An applicant qualifies for this preference if: the applicant has been involuntarily displaced and is not living in standard, permanent replacement housing or within no more than six months from the date of preference status certification by the family or verification by IHA that the applicant will be involuntarily displaced. (Standard permanent replacement housing is defined later in this section.)

An applicant is or will be involuntary displaced if the applicant has vacated or will vacate (as described above) his or her housing apartment as a result of one or more of the following actions:

- i) A disaster, such as flood or fire resulting in the inhabitability of an applicant’s apartment;
- ii) Activity carried on by an agency of the United States, or by any State or local governmental body or agency in connection with code enforcement, or a public improvement program, or developmental program;
- iii) Action by a housing owner that forces an applicant to vacate his/her apartment, provided:

- The reason for the owner's action is beyond an applicant's ability to control,
 - The action occurs despite the applicant's having met all previously imposed conditions of occupancy, and
 - The action taken is other than a rent increase.
- iv) Examples of actions taken by a housing owner that cause an applicant to vacate an apartment include BUT ARE NOT LIMITED TO:
- Conversion of the apartment to non-rental or non-residential use;
 - Closing of the apartment for rehabilitation or any other reason;
 - Notice to an applicant that he/she must vacate an apartment for the owner's personal/family use or occupancy;
 - Sale of the apartment in which the applicant resides under an agreement to vacate when possession is transferred;
 - Any other legal act that results or will result in the withdrawal of the apartment by the owner from the rental market.
- v) The reasons listed above do not include vacating the apartment by the resident as a result of actions taken because the resident refused to:
- Comply with applicable program policies or procedures under the 1937 Housing Act with respect to the occupancy of under-occupied or overcrowded units;
 - Accept a transfer to another housing apartment in accordance with the policies and procedures of a HUD-Approved desegregation plan.
- vi) An applicant is also involuntary displaced if:
- The applicant has vacated his/her housing apartment as the result of actual or threatened physical violence directed against the applicant or one or more members of the applicant's family by a spouse or other member of the applicant's household.
 - The applicant lives in a housing apartment with an individual who engages in such violence.
- To qualify as involuntarily displaced by domestic violence, the applicant must demonstrate that the violence occurred recently or is of a continuing nature. If the family is admitted, based on documentation presented by the applicant, IHA may terminate assistance to the family for breach of this certification.
- vii) An applicant is also involuntary displaced if:

- Family members provided information on criminal activities to a law enforcement agency and based on an assessment of an actual or potential threat to the safety of family member(s), the agency recommends re-housing the family to avoid violence against family members as a reprisal for providing such information.
 - One or more members of the applicant family have been victims of one or more hate crimes, and the family has vacated because of such a crime or the fear associated with such a crime. Hate crime shall be defined as: actual or threatened physical violence or intimidation that is directed against a person or his or her property because of the person's race, color, religion, sex, national origin, handicap, or familial status. IHA will attempt to determine whether the hate crime occurred recently or is of a continuing nature.
 - A member of the family has mobility or other impairment that makes the person unable to use a critical element of his/her apartment. This category of displacement applies only when the owner is not legally obligated to make changes to the apartment that would make the critical element accessible to the person with disabilities as a reasonable accommodation.
27. Kinship care – An arrangement in which a relative or non-relative becomes primary caregiver for a child or children but is not the biological parent of the child or children.
28. Live-in Aide – A person who resides with an elderly person(s) or person(s) with disabilities and who: (a) is determined by IHA to be essential to the care and well being of the person(s); (b) is not obligated to support the family member; and (c) would not be living in the apartment except to provide the necessary supportive services. (24 CFR 913.102)

IHA policy on live-in aides stipulates that:

- i) Before a live-in aide may be moved into an apartment, a third-party verification must be supplied that establishes the need for such care and the fact that the person cared for will be able to remain in the apartment and comply with the lease terms as the result of such care;
- ii) Move-in of a live-in aide must not result in overcrowding of the existing apartment (although, a reasonable accommodation for a resident with a disability may be to move the family to a larger apartment);

- iii) Live-in aides have no leasehold rights to the apartment as a remaining member of a resident family;
- iv) Relatives who satisfy the definitions and stipulations above may qualify as a live-in aide but only if they sign a statement prior to moving in relinquishing all right to the apartment as the remaining member of a resident family.
- v) A live-in aide can be a single person. A live-in aide with a family may also be considered for admission to the apartment provided that the addition of the live-in aide's family does not result in overcrowding of the existing apartment. The live-in aides and adult members of the live-in aide's family must meet IHA's screening requirements with respect to past behavior especially:
 - A record of disturbance of neighbors, destruction of property, or living or housekeeping habits at present or prior residences which may adversely affect the health, safety, or welfare of other tenants or neighbors;
 - Criminal activity such as crimes of physical violence to persons or property and other criminal acts including drug-related criminal activity which adversely affect the health, safety, or welfare of other residents or staff or cause damage to the apartment or the development; and
 - A record of eviction from housing or termination from any other residential programs.

- 29. Low-Income household – A family whose annual income does not exceed 80 percent of the median income for the area as determined by HUD with adjustments for smaller and larger families (24 CFR §913.102).
- 30. Medical Expense Allowance – For purposes of calculating adjusted income for elderly or disabled families only, medical expenses means expense in excess of 3% of Annual Income, where these expenses are not compensated for or covered by insurance (24 CFR §913.102).
- 31. Minor – A minor is a person less than 18 years of age. An unborn child will not be considered a minor. (See definition of dependent.) Some minors are permitted to execute contracts, provided a court declares them “emancipated”.

32. Mixed Population Community – Means a public housing community for elderly and disabled families. The IHA is not required to designate this type of community or prepare an allocation plan, for HUD approval. [24 CFR 945.105]
33. Multifamily housing community – For purposes of Section 504, means a community containing five or more dwelling units. [24 CFR §8.3]
34. Near-elderly family – Means a family whose head, spouse, or sole member is a near-elderly person (at least 50 but less than 62 years of age). The term includes two or more near-elderly persons living together, and one or more such persons living with one or more persons who are determined to be essential to the care or well being of the near-elderly person or persons. A near-elderly family may include other family members who are not near elderly. [24 CFR §945.105]
35. Near-elderly person – Means a person who is at least 50 years of age but below 62, who may be a person with a disability. [24 CFR §945.105]
36. Net Family Assets – The net cash value, after deducting reasonable costs that would be incurred in disposing of: [24 CFR §913.105]
- i) Real property (land, houses, mobile homes).
 - ii) Savings (CDs, IRA or KEOGH accounts, checking and savings accounts, precious metals).
 - iii) Cash value of whole life insurance policies.
 - iv) Stocks and bonds (mutual funds, corporate bonds, savings bonds).
 - v) Other forms of capital investments (business equipment).
 - vi) Net cash value is determined by subtracting the reasonable cost likely to be incurred in selling or disposing of an asset from the market value of the asset. Examples of such cost are: brokerage or legal fees, settlement cost for real property, or penalties for withdrawing saving funds before maturity.
 - vii) Net Family Assets also include the amount in excess of any consideration received for assets disposed of by an applicant or resident for less than fair market value during the two years preceding the date of the initial application or re-examination. This does not apply to assets transferred as the result of a foreclosure or bankruptcy sale.
 - viii) In the case of a disposition as part of a separation or divorce settlement, the disposition will not be considered to be less than fair market value if the applicant or resident receives important considerations not measurable in dollar terms (24 CFR §913.102).
37. Paying more than 50% of income for rent – This is one of IHA's local preferences for admission. A family must be paying more than 50% of income

for rent at the time of verification by IHA to qualify for this preference. [24 CFR §960.215]

An applicant does not qualify for this preference if either of the following is applicable:

- i) The family is paying 50 percent of income for rent for less than 90 days.
- ii) The applicant is paying 50 percent of income for rent because the applicant's housing assistance under certain HUD programs has been terminated because of the applicant's refusal to comply with applicable procedures on the occupancy of under-occupied and overcrowded units.
 - The programs are: Section 8 programs or public and Indian Housing programs under the United States Housing Act of 1937; the rent supplement program under section 101 of the Housing and Development Act of 1965; or rental assistance payments under Section 236(f)(2) of the National Housing Act.

(a) Definitional Elements:

- Family Income: Is Monthly Income or 1/12 of Annual Income as defined in 24 CFR 913.102.
- Rent: Is the actual amount due, calculated on a monthly basis, under a lease or occupancy agreement between a family and the family's current landlord. Rent includes the monthly cost of shelter plus utilities when utilities are resident-paid.
- Utilities: If the utilities are purchased directly by resident from the utility providers the applicable utility cost is determined in one of two ways:
 - 1) IHA's utility allowance for family-purchased utilities and services used in IHA's resident-based program;
 - OR
 - 2) If the family chooses the average monthly payments that it actually made for these utilities and services for the most recent 12-month period; or if that information is not obtainable for the entire 12-month period, for an appropriate recent period.

(b) Amounts paid to or on behalf of the family under any energy assistance program must be subtracted from the rent amount to the extent that they are not included in the family's income.

- (c) The formula for establishing rent burden preference can be expressed as follows:
- i) Rent = Monthly rent for shelter
Plus monthly utilities and services
Less energy assistance payments not counted in Income
 - ii) 50% of Family Income = Annual Income divided by 12 times .5
 - iii) Is (i) greater than (ii)? – If yes the family qualifies. If no the family is not entitled to the preference.
- (d) Verification of income, rent, and utility payments - The same standards the Agency uses in verifying income for the purpose of determining eligibility and Total Tenant Payment are applicable to verification of this preference.
38. Service Provider – means a person or organization qualified and experienced in the provision of supportive services, and that is in compliance with any licensing requirements imposed by State or local law for the type of service or services to be provided. The service provider may provide the service on either a for-profit or not-for-profit basis. (24 CFR §945.105)
39. Single Person – A person who is **not** an elderly person, a person with disabilities, a displaced person, a pregnant person, or the remaining member of a resident family (24 CFR §945.105)
40. Standard Permanent Replacement Housing [24CFR §960.213(a)(2)] – such housing is:
- a) decent, safe, and sanitary;
 - b) adequate for the family size;
 - c) occupied pursuant to a lease or occupancy agreement, and
 - d) Standard Permanent Replacement Housing does not include a transient facility such as a motel, hotel, or temporary shelter for victims of domestic violence or homeless families. In the case of domestic violence, the term does not include the housing apartment that the applicant, applicant's spouse, or other member shared with the person who engaged in the violence.
41. Spouse – Spouse means the husband or wife of the head of the household.
42. Substandard Housing [24 CFR §960.214] – This is one of IHA's local preferences.

- a) An apartment is substandard if it:
1. Is dilapidated; dilapidated means the apartment:
 - i) Does not provide safe and adequate shelter, and in its present condition endangers the health, safety, or well-being of a family; or
 - ii) Has one or more critical defects, or a combination of intermediate defects in sufficient number and extent to require considerable repair or rebuilding. The defects may involve original construction, or they may result from continued neglect or lack of repair, or from serious damage to the structure.
 2. Does not have operable indoor plumbing.
 3. Does not have a usable flush toilet inside the apartment for the exclusive use of a family (This element of the definition of substandard would not apply to multi-generation families or families doubled up in otherwise adequate units).
 4. Does not have a useable bathtub or shower inside the apartment for the exclusive use of the family.
 5. Does not have a safe or adequate source of heat.
 6. Should, but does not, have a kitchen.
 7. Has been declared unfit for habitation by an agency or department of government.
 8. Single Room Occupancy (SRO) is not considered substandard solely because it lacks sanitary or food preparation facilities.
- b) Applicants who are homeless families are considered to be living in substandard housing. A homeless family includes any person or family who:
- Lacks a fixed, regular, and adequate nighttime residence; and has a primary nighttime residence that is:
- A supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelter, and transitional housing for the mentally ill);

- An institution that provides a temporary residence for individuals intended to be institutionalized; or
 - A public or private place not designed for, or ordinarily used as a regular sleeping accommodation for human beings.
9. Homeless family does NOT include any individual imprisoned or otherwise detained pursuant to an act of Congress or State law.
43. Supportive Services – Means services available to persons residing in a development, requested by disabled families and for which there is a need. The term may include, but is not limited to, meal services, health-related services, mental health services, services for non-medical counseling, meals, transportation, personal care, bathing, toileting, housekeeping, shore assistance, safety, group and socialization activities assistance with medications (in accordance with State law), case management, and personal emergency. (24 CFR §945.105)
44. Resident Rent – The amount payable monthly by the family as rent to IHA. Where all utilities (except telephone) and other essential housing services are supplied by the Agency, Resident Rent equals Total Resident Payment. Where some or all utilities (except telephone) and other essential Housing Services are not supplied by the IHA and the cost thereof is not included in the amount paid as rent, Resident Rent equals Total Resident Payment less the Utility Allowance (24 CFR §913.102)
45. Total Tenant Payment (TTP) – The TTP is the highest of the following amounts, rounded to the nearest dollar: (1) 30% of the family's monthly adjusted income; (2) 10% of the family's monthly income; (3) If the family is receiving payments for welfare assistance from a public agency and a part of those payments, adjusted in accordance with the family's actual housing costs, is specifically designated by such agency to meet the family's housing costs, the portion of those payments which is designated for housing; or (4) flat rent as opted for by the resident or (5) minimum rent.
46. Uniform Federal Accessibility Standards – Standards for the design, construction, and alteration of publicly owned residential structures to insure that physically handicapped persons will have ready access to and use of such structures. The standards are set forth in Appendix A to 24 CFR part 40. See cross reference to UFAS in 504 regulations, [24 CFR §8.32(a)]

47. Utilities – Utilities means water, electricity, gas, other heating, refrigeration and cooking fuels, trash collection, and sewerage services. Telephone service is not included as a utility. 24 CFR §965.473).
48. Very Low-Income Family – Very low-income family means a family whose Annual Income does not exceed 50 percent of the median Annual Income for the area, with adjustments for smaller and larger families, as determined by the Secretary of Housing and Urban Development (24 CFR §913.102).
49. Utility Reimbursement – Funds that are reimbursed to a resident or to the utility company on the residents behalf if the utility allowance exceeds the Total Resident Payment (24 CFR §913.102)
50. Welfare Assistance – Income assistance from federal or state welfare programs, including Temporary Assistance to Needy Families (TANF). Welfare assistance does not include assistance solely for the purpose of meeting housing expenses nor does it include programs that provide services for working families such as healthcare and children.

SECTION VI. ADMISSIONS

1. How to Apply: - The IHA operates site-based waiting lists. Families wishing to apply for Public Housing shall complete an application for public housing assistance.

Applications will be accepted at the community site locations only. At these locations, applications are accepted for any community for which the waiting list is open.

Applications are taken to compile a waiting list. Due to the demand for housing in IHA's jurisdiction, IHA may take applications on an "open enrollment" basis, depending on the length of the waiting list.

Completed applications will be accepted for all applicants and the information will be verified by IHA.

Applications must be made in person at IHA during specified dates and business hours posted at IHA's Office and/or any designated community which will be publicized accordingly.

The application must be dated, time-stamped.

Individuals, who have a physical impairment, which would prevent them from completing an application in person, may call IHA to make special arrangements. A Telecommunication Device for the Deaf (TDD) is also available.

If the applicant is visually impaired, all notices must be in a format readable to the applicant.

2. Closing of Application Acceptance:

If IHA is taking applications, IHA may suspend the taking of applications for any individual community if the waiting list is such that additional applicants would not be able to occupy a public housing apartment within the next 12-month period. Application taking may be suspended by bedroom size, if applicable. IHA will make known to the public through publication in a newspaper of general circulation, minority media, and other suitable means the fact that applications for public housing units are being suspended.

To reach persons, who cannot read the newspapers, IHA will distribute fact sheets to the broadcasting media. Personal contacts with the news media and with community service personnel, as well as public service announcements, will be made.

3. Opening of Application Acceptance: When IHA starts taking applications for any community, the waiting list may be opened by bedroom size.

IHA will utilize the following procedures:

IHA will make known to the public through publication in a newspaper of general circulation, minority media, and other suitable means the availability and nature of housing assistance for eligible families.

The notice must contain the following:

- a) The date applications will be accepted and the location where applications can be completed.
 - b) The date of acceptance and closing of applications must be published.
 - c) Briefly describe the Public Housing program; and
 - d) State that applicants for Public Housing must specifically apply for the Public Housing units and that applicants for Public Housing may also apply for the Section 8 Program, If the program is simultaneously accepting applications, and they will not lose their place on the Public Housing waiting list if they also apply for Section 8 assistance.
- To reach persons, who cannot read the newspapers, IHA will distribute fact sheets to the broadcasting media. Personal contacts with the news media and with community

service personnel, as well as public service announcements, will be made.

4. Application Period (Dates):- The application closing date may be determined administratively at the same time that IHA determines to open enrollment. The open enrollment period shall be long enough to allow enough applicants as required by the projected turnover and the number of public housing vacancies.

A. Nondiscrimination

1. It is the policy of IHA to comply with all applicable laws relating to Civil Rights, including Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988), Executive Order 11063, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Title II of the Americans with Disabilities Act (to the extent that it applies, otherwise Section 504 and the Fair Housing Amendments govern), any applicable State laws or local ordinances and any legislation protecting the individual rights of tenants, applicants or staff that may subsequently be enacted. (24 CFR § 100.5)
2. IHA shall not discriminate because of race, color, sex, religion, familial status, disability, or national origin in the leasing, rental, or other disposition of housing or related facilities, including land, that is part of any community(s) under IHA's jurisdiction covered by a contract for annual contributions under the United States Housing Act of 1937, as amended, or in the use or occupancy thereof.¹ (24 CFR § 100.5)
3. IHA shall not, on account of race, color, sex, religion, familial status, disability, or national origin:
 - a) Deny to any family the opportunity to apply for housing, nor deny to any qualified applicant the opportunity to lease housing suitable to its needs;
 - b) Provide housing which is different from that provided others similarly situated;²
 - c) Subject a person to segregation or disparate treatment;

¹. Under certain specific conditions described in the Housing Opportunity Program Extension Act of 1996, IHA is permitted to designate occupancy of certain developments for older persons (including elderly people with disabilities).

² A PHA is required to provide persons with disabilities housing that is appropriate for their need. Therefore, accessible or adaptable housing, although different from that provided to others, is permitted because it permits persons with disabilities to freely participate in the public housing program.

- d) Restrict a person's access to any benefit enjoyed by others in connection with the housing program;
 - e) Treat a person differently in determining eligibility or other requirements for admission;³
 - f) Deny a person access to the same level of services; or⁴
 - g) Deny a person the opportunity to participate in a planning or advisory group that is an integral part of the housing program.
4. IHA shall not automatically deny admission to a particular group or category of otherwise qualified applicants (e.g., families with children born to unmarried parents, elderly families with pets, or families whose head or spouse is a student). Each applicant in a particular group or category must be treated on an individual basis in the normal processing routine. (24 CFR § 960.205)
5. IHA will establish policies and procedures that ensure equal housing opportunities for all. In accordance with §504 and the Fair Housing Amendments Act of 1988, IHA will make structural modifications to its housing and non-housing facilities (24 CFR §§ 8.21, 8.23, 8.24, and 8.25), and/or reasonable accommodations (24 CFR § 100.204) to permit persons with disabilities to take full advantage of the housing program.
- a) In making structural modifications or reasonable accommodations to existing housing programs, IHA is not required to:
 - i) make each of its existing facilities accessible [24 CFR § 8.24 (a) (1)]; or make structural alterations when other methods can be demonstrated to achieve the same effect; [24 CFR § 8.24 (b)]
 - ii) make structural alterations that require the removal or altering of a load-bearing structural member [24 CFR § 8.32 (c)]
 - iii) provide an elevator in any multifamily housing community solely for the purpose of locating accessible units above or below the grade level; [24 CFR § 8.26]
 - iv) take any action that would result in a fundamental alteration in the nature of the program; [24 CFR § 8.24 (a) (2)]

³ Except that a PHA is required to offer reasonable accommodation to applicants with disabilities. This will not affect the PHA's screening or eligibility.

⁴ This requirement applies to service provided by the PHA and services provided by others which has been authorized by the PHA and which takes place on PHA property.

- v) take any action that would result in an undue financial and administrative burden on the Agency. [24 CFR § 8.24 (a) (2)]
6. When IHA makes substantial alterations (in developments with 15 or more units, work whose value exceeds 75% of the replacement cost of the facility) to an existing housing facility, it must comply with the accessibility requirements for new construction (see 24 CFR § 8.23).
 7. In general, accepting an applicant from a lower waiting list position before one in a higher position violates policy, federal law, and the civil rights of the other families on the waiting list. (24 CFR § 906.204 (a)(3)(ii)) Accordingly, IHA will not offer units in an order different from that prescribed by this policy except where necessary to comply with income mixing and the prohibition against concentration of extremely low-income families in certain community (ties) or building(s).

B. Accessibility and Plain Language

1. Facilities and programs used by residents must be accessible. Application and management offices, hearing rooms, community centers, laundry facilities, craft and game rooms and other common areas must be available for use by residents with a full range of disabilities. If these facilities are not already accessible (and located on accessible routes), they will be made so, subject to the undue financial and administrative burden test. (24 CFR § 8.20 and 8.21) Alternatively, where there are comparable programs or facilities, IHA will provide accessible transport that will permit a resident to use an accessible facility or participate in an accessible program at a building other than where the resident lives. (24 CFR § 8.20 and 8.21)
2. IHA will use best efforts to develop documents that use plain language and are written simply and clearly so that all applicants, including those with learning or cognitive disabilities, can understand the information contained in the documents. IHA may also, when appropriate, provide other forms of communication such as large print documents, documents on tape, or documents translated into a language other than English.
3. IHA will, to the extent possible, assist residents and facilitate third party assistance to residents, particularly those unable to read or to write in English and those suffering from mental retardation or other learning or cognitive disabilities. Assistance can include explaining documents orally or providing examples, having a third party (e.g. friend, relative or advocate) receive, interpret or explain housing documents, providing sign language or foreign

language interpretation, or any other assistance intended to help residents better understand documents and issues.⁵

4. At a minimum, IHA will prepare the following information in a “plain language” accessible format:
 - a) Marketing and informational materials.
 - b) Information about the application process.
 - c) The application form.
 - d) All form letters notices to applicants and residents.
 - e) General statement about reasonable accommodation.
 - f) Orientation materials for new residents.
 - g) Guidance or instructions about care of the housing apartment.
 - h) Information about opening, updating or closing the waiting list.
 - i) All information related to applicant’s rights (to informal meetings, etc.).

C. Marketing and Outreach

1. It is the policy of IHA to conduct marketing and outreach activities that will promote income mixing and deconcentration of poverty. These efforts will take into consideration IHA’s policy to address the needs of low-income and extremely low-income families, including elderly families and families with disabilities. The level and nature of marketing and outreach activities will be based on the level of vacancies in IHA units, the availability of units through turnover, and the waiting list characteristics. IHA will periodically assess the need for and scope of marketing and outreach activities.
2. Efforts will be made to target all agencies that serve and advocate for potentially qualified applicants.
3. All marketing materials will comply with the Fair Housing Act requirements with respect to wording, logo, size of, type, etc (24 CFR § 109. 30.6).
4. Marketing material will/should include:
 - a) An accurate description of the housing units, application process, waiting list and preference structure;
 - b) “Plain language” that incorporates more than strictly English-language print media;

⁵ Fair housing law require PHA to pay for a sign language interpretation for the hearing impaired. The laws do not establish the same requirement for foreign language interpretation.

- c) Clearly defined eligibility standards such as individuals and families and persons with physical and mental disabilities.
- d) IHA's responsibility to provide reasonable accommodations to persons with disabilities.

D. Qualifications for Admission

1. It is IHA's policy to admit only applicants who are eligible and able to meet the applicant selection standards.
2. An applicant is qualified if he or she meets all of the following criteria:
 - a) Is a family as defined in Section IV, Definition 22, of this policy:
 - b) Heads a household where all members of the household are citizens or eligible noncitizens; (24 CFR § 200, and §§ 912.5 - 912.14)
 - c) Has an annual income at the time of admission that does not exceed 80% of area medium income ("AMI");
 - d) Provides a Social Security number for all family members, age 6 or older, or can document and certify that they do not have Social Security numbers; (24 CFR §913.109)
 - e) Meets or exceeds the Applicant Selection Criteria set forth in this policy, including mandatory attendance and successful completion of IHA's Pre-Occupancy Orientation session; (24 CFR §960.205) and
 - f) Is not currently adequately housed in an IHA dwelling apartment. Applicants who are listed on a current IHA dwelling lease (or are part of the household as verified by IHA records) and reside in an apartment meeting the occupancy standards for the family size are not qualified for admission and will not be placed on the waiting list for new applicants. (IHA may make exceptions to this requirement due to emergency conditions including but not limited to severe harassment, hate crimes, and witness protection, as authorized by IHA's Executive Director or designee)

SECTION VII. VERIFICATION AND DOCUMENTATION FOR ADMISSIONS AND CONTINUED OCCUPANCY

A. REQUIRED DOCUMENTATION

Families are required to provide Social Security Numbers (SSN) for all family members age 6 and older prior to admission. All members of the family defined above must either:

1. Submit SSN documentation; or
2. Sign a certification if they have not been assigned a SSN. If the individual is under 18, his or her parent or guardian must execute the certification. If the participant, who has signed a certification form, obtains a SSN, it must be disclosed at the next regularly scheduled reexamination, or next rent change.
3. Verification will be accomplished by providing a valid Social Security card issued by the Social Security Administration.
4. IHA will accept copies of the Social Security card only when it is necessary for IHA to verify by mail the continuing eligibility of participant families.
5. If an applicant or resident cannot provide his or her Social Security card, other documents listed below showing his or her Social Security Number may be used for verification. He or she may be required by IHA to provide one or more of the following alternative documents to verify his or her SSN, until a valid Social Security card can be provided:

These documents include:

- Driver's license, that displays the SSN
- Identification card issued by a Federal, State or local agency
- Identification card issued by an employer or trade union
- Identification card issued by a medical insurance
- Company Earnings statements or payroll stubs
- Bank statements
- IRS Form 1099 or W-2 Form
- Benefit award letters from government agencies
- Medicaid Cards
- Unemployment benefit leave
- Retirement benefit
- Life insurance policies
- Court records such as real estate, tax notices, marriage and divorce, judgment or bankruptcy records.
- If IHA verifies Social Security benefits with the Social Security Administration, the acceptance of the SSN by the Social Security Administration may be considered documentation of its validity.

- Applicants will not be placed on the waiting list until the documentation is provided and verified. Applicant will be given a reasonable time, subject to the circumstances, to furnish the documentation.

Additional documentation that may be required in determining eligibility for admissions:

- Temporary Assistance To Needy Families (TANF)
- Birth Certificate, or Drivers License that displays the date of Birth and/or form (s) that are issued by a Federal, State, City or County Agency that displays the date of Birth.
- Child Care Verification
- Credit References (at initial admission or when adding someone to the lease)
- Credit Bureau Reports (at initial admission or when adding someone to the lease)
- Employer's Verification
- Landlord Verification (at initial admission or when adding someone to the lease)
- Social Security Benefits
- Assets Verification
- Bank Accounts
- Marital Status- Couples that are considered married under common law can provide the same information, as listed above, to document that they are living together as a married couple. The couple also certifies in their application for housing that they are married. Separation means the ending of co-habitation by mutual agreement. If *an applicant is* divorced* or separated and has children by that spouse, applicant must provide at least one of the verifications listed: A final divorce decree. *(Applies to individuals who are divorced and are not separated and is the only documentation accepted for individuals that are divorced) Verification that applicant is pursuing child support through Department of Family and Social Services, Child Support Apartment or Circuit Clerks Office. If applicant is receiving personal child support, then applicant can make arrangements to have the child support paid through the court system, either through the circuit clerks office, Department of Family and Social Services, or through a court referee. Receiving TANF (Temporary Assistance to Needy Families) through the Department of Family and Social Services for former spouse's children. A notarized statement from current landlord (not family) verifying that the current landlord knows that the applicant and spouse have not lived together for the last six (6) months or more. Income tax statements from both husband and wife indicating both filed

income taxes separately the last year and that both filed from different addresses.

- Personal References: Personal references may be used when an applicant cannot produce prior rental history records.
- Supplemental Social Security Income (SSI) Benefits
- Unemployment Compensation
- VA Benefits
- Any other reasonable information needed to determine eligibility requested by the IHA, which may include police reports.

NOTE: APPLICANT WILL BE PLACED ON WAITING LIST BASED ON “PRESUMPTIVE” ELIGIBILITY. THE IHA MAY NOT ACTUALLY VERIFY VARIOUS INCOME AND OTHER FACTORS UNTIL THE APPLICATION NEARS THE TOP OF THE WAITING LIST.

SECTION VIII. GROUNDS FOR DENIAL OF ADMISSION

1. IHA is not required nor obligated to assist families who:

- A) Owes rent, other monies, or judgments to any IHA or any other federally subsidized housing program, the applicant will be declared ineligible. At IHA's discretion, the applicant may be declared eligible upon payment of debt, with the date and time of application being the time of payment and successful completion of all necessary verification.

Note: Applicants that owe IHA or any other federally subsidized program funds will not be processed for occupancy. The applicant must pay the funds owed prior to the application being processed. After the application is processed the applicant must meet all other conditions for occupancy. Re-paying funds that are due does not necessarily qualify an applicant for occupancy. Such payments will be considered along with other factors in the application process. Any money owed to IHA, which has been discharged by bankruptcy, shall not be considered in making this determination.

- A. Has previously been evicted from public housing.
- B. Committed acts, which would constitute fraud in connection with any federal assisted housing program.

Intentional misrepresentation of income, family composition or any other information affecting eligibility, will result in the family being declared ineligible. In the event the misrepresentation is discovered after admission, the lease will be terminated for such misrepresentation.

- C. Did not provide information required within the time frame specified during the application process.
- D. Convicted of drug-related criminal activity or violent criminal activity. IHA shall prohibit admission to any household that includes any individual who is subject to a lifetime registration requirement under a state sex offender registration program.
- E. Has a history of not meeting financial obligations, especially the payment of rent.
- F. Has a record of disturbance of neighbors, destruction of property, or living or housekeeping habits, which may adversely affect the health, safety or welfare of the other tenants.
- G. Has a history of criminal activity involving crimes of physical violence to persons or property and other criminal activity that may adversely affect the health, safety, or welfare of other tenants.
- H. During the interview process the applicant demonstrates hostile behavior that indicates the prospective applicant may be a threat to our public housing residents.
- I. The applicant family must have properly completed all application requirements, including verifications. Intentional misrepresentation of income, family composition or any other information affecting eligibility, will result in the family being declared ineligible. In the event the misrepresentation is discovered after admission, the lease will be terminated for such misrepresentation.
- J. The applicant and all adults must sign a release allowing IHA to request a copy of a police report from the National Crime Information Center, Police Department or other Law Enforcement Agencies.
- K. If the applicant is a former Public Housing or Section 8 participant who vacated the apartment in violation of their lease, the applicant may be declared ineligible.
- L. If IHA determines that a person is illegally using a controlled substance or abuses alcohol in a way that may interfere with the health, safety, or right to peaceful enjoyment of the premises by other residents. IHA may waive this requirement if:
 - (1) The person demonstrates to IHA's satisfaction that the person is no longer engaging in drug-related criminal activity or abuse of alcohol;

- (2) Has successfully completed a supervised drug or alcohol rehabilitation program;
- (3) Has otherwise been rehabilitated successfully; or
- (4) Is participating in a supervised drug or alcohol rehabilitation program.

Note: The above list is not intended to be all-inclusive. Applicants may be denied admission if IHA has reason to believe that the conduct of the applicant would be likely to interfere with other tenants in such a manner to diminish their enjoyment of the premises by adversely affecting their health, safety, or welfare or to affect adversely the physical environment or the financial stability of the community if the applicant were admitted to the community.

NOTIFICATION OF DENIAL

1. If an applicant is denied admission, IHA will notify the applicant, in writing, of its determination and inform the applicant that they have an opportunity for an informal meeting on such determination. The denial letter will allow the applicant fourteen (14) business days to request an informal meeting (verbal and/or in writing) with IHA. An IHA representative will hear the appeal and issue a decision, in writing within ten (10) calendar days of the meeting.
2. As a general rule, applicants may be denied admission to Public Housing under the following circumstances:
 - A. Denied admission for one (1) year for the following:
 - Past rental record
 - Bad rent paying habits
 - Bad housekeeping habits, in and outside the apartment
 - Damages beyond reasonable wear and tear
 - Disturbances
 - Live-ins
 - Demonstrates hostile behavior during the interview process that indicates the applicant may be a threat to our residents.
 - B. Denied admission for three (3) years for the following:
 - Persons evicted from public housing, Indian Housing, Section 8.
 - Section 23 programs because of drug-related criminal activity are ineligible for admission to public housing beginning on the date of such eviction.

Note: IHA may waive this requirement if: the person demonstrates to IHA's satisfaction successful completion of a rehabilitation program approved by IHA, or the circumstances leading to the eviction no longer exist.

- C. Denied admission for five (5) years for the following:
 - Fraud (giving false information on the application).
 - An arrest or conviction record that indicates that the applicant may be a threat and/or negative influence on other residents. The five years shall begin on the date of the last reported act, completion of sentence and/or probation period.
 - Drug use without evidence of rehabilitation.

- D. Denied admission for ten (10) years for the following:
 - Conviction for drug trafficking

- E. Denied admission for life to any household that includes any individual who is subject to a lifetime registration requirement under a state sex offender registration program.

- F. Denied admission for life to any applicant who has been convicted of manufacturing or producing methamphetamine (commonly referred to as "speed") on the premises of the public housing community. Premises are defined as the building or complex in which the dwelling apartment is located, including common areas and grounds.

Note: As noted above these time frames are only guidelines and IHA may deny admission to any individual whose behavior may adversely affect the health, safety or welfare of other tenants or may admit persons who exhibit evidence of rehabilitation.

(SECTION IX WAS AMENDED ON September 7, 2005. AMENDMENT ATTACHED TO THE LAST PAGE OF THIS POLICY AS NEW SECTION IX.)

SECTION IX. RESIDENT SELECTION AND ASSIGNMENT PLAN

1. Equal Opportunity: - The Fair Housing Act makes it illegal to discriminate on the basis of race, color, religion, sex, handicap, familial status and national origin. IHA shall not deny to any family the opportunity of applying for admission nor shall it deny to any eligible applicant the opportunity of leasing or renting an apartment suitable to its need in any low-rent community operated by IHA.

2. Selection Process: - Tenants shall be selected from among eligible applicant families whose family composition is appropriate for available dwelling units. IHA will take into consideration the needs of individual

families for low rent housing and the statutory purpose in developing and operating a socially and financially sound low-income housing community, which provides a decent home and a suitable living environment and fosters economic and social diversity in the resident body as a whole. Selection will be made in such a manner as:

- A. For every fiscal year, IHA shall reserve a percentage of its new admissions for families whose incomes do not exceed 30% of the area median income. The goal for public housing shall be 40% of new admissions. In reaching the new admissions goals, IHA is required to avoid concentrating very low-income families in community (ties).
- B. To maintain a resident body in each community composed of families with a broad range of income and rent paying ability which is generally representative of the range of incomes of low income families in IHA's area of operation as defined by state law.
- C. IHA will utilize waiting list as primary vehicle to define "order of selection" of applicants.

3. Order of Selection: - Applications will be filed in the following hierarchical order:

- A. Apartment size/type needed by applicants; and
- B. Preferences, if applicable; and
- C. Date and time of successful completion of all necessary verification; and
- D. Provided, however, the provisions of the deconcentration rule, contained within this policy, shall supercede the selection of applicants based on date and time and local preference points, if applicable, and allow IHA to skip families on the waiting list to accomplish this goal.

4. Verification of Preference, If Applicable: - At the time of application, initial determinations of an applicant's entitlement to a preference may be made on the basis of an applicant's certification of their qualification for that preference. Before selection is made, this qualification must be verified.

Note: An applicant can reject an offer 1 time before losing their place on the waiting list. If an applicant rejects the 1st offer, the applicant will be notified at that time that due to the fact they refused the offer of assistance, they will go to the bottom of the waiting list. This will be explained at time of application. IHA will notify the applicant that their actions may affect their place on the waiting list, and the next offer of

assistance will be made when their name reaches the top of the waiting list a second time. If an applicant rejects 2 offers they will be “dropped from the list”.

5. Interviews and Verification Process

- a) The following items will be verified:
 - (i) Family composition and type (Elderly/non-elderly);
 - (ii) Annual income;
 - (iii) Assets and Asset income;
 - (iv) Allowance Information;
 - (v) Preferences;
 - (vi) Social Security numbers and Birth Certificates of all family members
 - (vii) Citizenship or eligible non-citizenship status
 - (viii) Any other

- b) Generally, IHA will use written third party verifications to substantiate applicant or resident claims. IHA may also use phone verifications with the results recorded in the file, dated, and signed by IHA staff; review of documents; and if no other form of verification is available, applicant certification. Applicants will be required to cooperate fully in obtaining or providing the necessary verifications.

- c) Verification of citizenship or eligible non-citizenship status shall be carried out pursuant to 24 CFR §912.8 using the Immigration and Naturalization Service’s (INS) SAVE system and, if needed, a manual search of INS records.

6. IHA’s records with respect to applications for admission to any low-income housing assisted under the United States Housing Act of 1937, as amended, shall indicate for each application the date and time of receipt; the determination by IHA as to eligibility or ineligibility of the applicant; when eligible, the apartment size for which eligible; the preference rating, if any; and, the date, location, identification, and circumstances of vacancy offered and accepted or rejected.

E. Waiting List Management

1. Waiting List Preferences

- a) IHA may give preferences to applicants on the waiting list or may add applicants to a waiting list based on certain family characteristics and

income mix and deconcentration requirements. Applicants must provide verification of qualification for any preference.

- b) IHA will not give preferences to applicants on the waiting list or will not add applicants to the waiting list based on a system of preferences if the following conditions exist:
 - i) There is an adequate pool of applicants already on the waiting list who are likely to qualify for a preference; and [See 24 CFR §960.207(b)(1)];
 - ii) It is unlikely that under IHA's system for applying the preference that the family making the application could qualify for assistance ahead of other applicants already on the waiting list. [See 24 CFR §960.207(b)(2)]; or
 - iii) Preferences will adversely affect IHA policy to promote income mixing or deconcentration of poverty.
- c) The determination above is based on the preference system described in these policies, the preference or preferences claimed by applicants already on the waiting list, and the preference or preferences claimed by the applicant-seeking placement on the waiting list.
- d) Change in Preference Status while on the Waiting List
 - i) Applicants who experience a change in circumstances that either qualifies or disqualifies them for a preference will be required to contact IHA immediately so their status on the waiting list may be updated.
 - ii) Upon determination that the family qualifies for a preference, they will be moved up on the waiting list in accordance to their preference(s), any ranking preference(s), and their date and time of application.

F. The Preference System

1. IHA preference system is used to establish the order of placement on the waiting list, not to guarantee admission, and every applicant must still meet IHA's Resident Selection Criteria (described later in this policy)

before being offered housing. There may be factors other than preferences that affect the selection of applicants from the waiting list.

2. Preferences will be granted to applicants who are otherwise qualified and who, at the time they are certified for admission, meet the definitions of the preferences described below.
3. Preferences are based on local housing needs and priorities and are also used to encourage and promote self-sufficiency among residents. IHA will apply the following preferences, all of which are ranked equally:
 - a) Employment and/or Participation in Work Training Programs.

While the Family is on the Waiting List- Employment of a previously unemployed family member, age 18 or older, at time of application or during processing of application that lasts at least 90 days and provides a minimum of 20 hours of work per week for the family member claiming the preference.

At the Time of Offer - Employment of a previously unemployed family member, age 18 or older, employed at the time of IHA's offer of housing. Employment at the time of the offer must have been for a 90-day period immediately prior to the offer of housing and provide a minimum of 20 hours of work per week for the family member claiming the preference.

- Employment periods may be interrupted but to receive the preference, a family must have an employed family member prior to the actual offer of housing as described above.
- A family member that leaves a job after receiving the benefit of the preference will be asked to document the reasons for the termination. Someone who voluntarily terminates their employment (as opposed to layoff, or taking a new job) will be considered to have misrepresented the facts to IHA and will lose their preference.
- The amount earned shall not be a factor in granting this local preference. The local preference shall also be available to a family if the head, spouse, or sole member is 62 or older, or is receiving Social Security Disability, or SSI benefits, or any other payments based on the individual's inability to work. [24 CFR 960.212 (b)(1)]

- i) Job Training - IHA will give a local preference for a family that can verify, at the time of initial application or while on the waiting list, participation in a job training program or graduation from such a program. The family must notify IHA if it enters such a program while on the waiting list and

provide documentation of participation to IHA such as attendance and program files. IHA will not grant this preference if the family fails to provide documentation. Notice and verification of the preference claim must be received prior to the actual offering of housing to claim this preference applicants must be in good standing with respect to attendance and program rules of the training program.

- b) Elderly, Disabled, or Disability - Families with the head, spouse or sole member who is 62 years or older, or is receiving social security disability, or SSI benefits, or any other payments based on the individuals inability to work.
4. IHA will not hold units vacant for prospective applicants with preferences, nor will it relax eligibility or screening criteria to admit otherwise unqualified applicants with preferences.
5. IHA will not give preference to an applicant if any member of the applicant family is a person evicted during the past three years because of drug-related criminal activity from housing assisted under the 1937 Housing Act. [24 CFR 960.211(b)(3)] IHA may give an admission's preference in any of the following cases:
- a) Applicants must advise IHA at time of initial application of any factors that may qualify them for a preference;
 - b) If IHA determines that the evicted person clearly did not participate in or know about the drug-related criminal activity; or
 - c) If IHA determines that the evicted person no longer participates in any drug-related criminal activity.
6. Administration of the Preferences
- a) IHA requires that applicants certify to their qualification for preferences at the time of initial application.
 - b) Due to administrative constraints, the IHA generally cannot verify preferences at time of application. Hence, applicants will generally self-certify their preferences at time of placement on the waiting list. Subsequently, when applicants come near the top of the waiting list, they will be required to verify their preferences. If that preference cannot be verified, the application will be placed on the non-preference waiting list according to date/time.
 - c) If at the time of initial application a preference is claimed, IHA will advise the family of the need to verify the claim. At the initial

application interview, the family will be advised to notify IHA of any change that may affect their ability to qualify for a preference.

- d) Applicants that are otherwise eligible and are certified or verified as qualifying for a preference will be placed on the waiting list in the preference applicant pool.
 - e) Families who claims a preference that do not qualify for a preference at the time of application will be notified in writing and advised of their right to an informal meeting as described below. If otherwise qualified, the family's application will then be placed on the waiting list in the appropriate non-preference category.
 - f) Applicants that certify/verify to a preference at the time of initial application must be able to verify their continued preference status prior to the offer of an apartment. Applicants that cannot verify continued preference status would lose their preference qualification and their standing on the waiting list.
 - g) Families that lose their original preference, but still qualify for another preference, will be placed on the waiting list in accordance with their current preference status. Families that cannot qualify for any of the preferences will be moved into a non-preference category, in a lower position on the waiting list based on date and time of IHA's completion of all necessary verification.
7. Qualifying for Preferences. Applicants may not qualify for this preference if they were a resident family and refused to comply with applicable program policies or procedures with respect to the occupancy of under-occupied and over-crowded units; or failed to accept a transfer to another housing apartment in accordance with a court decree or in accordance with the policies and procedures of a HUD-approved desegregation plan.
8. Notice and Opportunity for a Hearing [24 CFR §960.211(e)]
- a) IHA will provide a written notice of determination in those cases where an applicant does not meet the criteria for receiving a preference. This notice shall contain a brief statement of the reasons for the determination and a statement that the applicant has the right to request an informal hearing to review the determination.
 - b) If the applicant requests an informal hearing, IHA shall designate an officer or employee to conduct the hearing. This person(s) may be the person who made the initial determination or reviewed the

determination of his or her subordinate. A written summary of this meeting shall be made and retained in the applicant's file.

- c) The applicant will be advised that he/she may exercise other rights if the applicant believes that illegal discrimination, based on race, color, religion, national origin, age, disability, or familial status has contributed to IHA's decision to deny the preference.

H. Factors Other than Preferences that Affect the Selection of Applicants from the Waiting List

The Preference System described in this policy will work in combination with requirements to match the characteristics of the family to the type of apartment available including units with targeted populations. When such matching is required or permitted by current law, IHA will give priority to the families described below. The ability to provide priority for family types will depend on the apartment size available. These priorities will apply to applicants in both the preference and non-preference pool.

The following factors will affect the applicant's selection process:

1. Units with Accessible Features. IHA will give priority to families that include persons with disabilities who can benefit from the apartment features. If no family can be found for an apartment with accessible features, IHA will house a family not needing the apartment features subject to the procedures described in the Resident Selection and Assignment Plan, described later in this policy. Under this policy a non-disabled family in an accessible apartment can be required to move so that a family needing the apartment features can take advantage of the apartment.
2. Units Designated for Elderly or Disabled Families. IHA will give a priority to elderly or disabled families for units designated for such use.
 - a) Units designated for the elderly⁶ (24 CFR §§945.201, 945.105, and 945.303) - in accordance with the 1992 Housing Act elderly families with a head, spouse or sole member at least 62 years of age will receive a preference for admission to such units or buildings covered by a HUD-approved Allocation Plan.
 - (i) When there are insufficient elderly families on the waiting list, near elderly (head or spouse ages 50-61) may receive a preference for this type of apartment.

⁶ This reference is to buildings or portions of buildings designated for the elderly by following the requirements of the 1992 Housing Act. Designation of housing for the elderly requires the preparation of an allocation plan. A public hearing must be held on the plan and the plan must be presented to HUD for review and approval.

(ii) When there are insufficient elderly or near-elderly families and units are ready for leasing more than 60 days all other family types are eligible for such units.

b) Units designated for the disabled⁷ (24 CFR §945.105, 945.201, 945.203, 945.205, and 945.303) - in accordance with the 1992 Housing Act, disabled families with a head, spouse or sole member who qualifies as a person with disabilities as defined in 24 CFR §945.105 will receive a preference for admission to units that are covered by a HUD-approved Allocation Plan.

3. Admissions Mandated by the Court. Any admission mandated by court order related to desegregation or Fair Housing and Equal Opportunity will take precedence over the Preference System. Other admissions required by court order will also take precedence over the Preference System. If permitted by the court order, IHA may offer the family a housing certificate or voucher.

4. Higher or Lower-Income Applicants. IHA will give a priority to higher or lower income applicants in order to achieve income mixing or to facilitate deconcentration of poverty.

I. Applicant Selection Criteria

C

1. All applicants will be screened in accordance with HUD regulations (24 CFR part 960) and sound management practices. During screening, IHA will determine applicants' ability to comply with essential provisions of the lease through an assessment of objective evidence of applicants' current and past behavior, including the ability to:

- a) Pay rent and other charges as required by the lease in a timely manner;
- b) Care for and avoid damaging the apartment and common areas;
- c) Use common areas, facilities, and equipment in a reasonable way;
- d) Create no health, or safety hazards, and to report maintenance needs;
- e) Comply with health and safety codes;
- f) Comply with community service requirements;
- g) Not interfere with the rights and peaceful enjoyment of others and avoid damaging the property of others;
- h) Not engage in any activity that threatens the health, safety or right to peaceful enjoyment of other residents or staff; and not engage in drug-related criminal activity on or off IHA premises; and

⁷ Buildings can also be designated for disabled families, also by following the requirements of the 1992 Housing Act. This entails preparing an allocation plan noting which buildings (if any) will be set aside for the disabled and preparing a supportive services plan. HUD approval is required for both the allocation and the supportive services plans.

- i) Comply with necessary and reasonable rules and program requirements of HUD and IHA; including the mandatory community service described in VIII C of this policy.

2. IHA will determine the applicant's ability to comply with essential lease requirements:

Applicant ability and willingness to comply with the essential lease requirements will be verified. Information to be considered in completing applicant screening shall be reasonably related to assessing the conduct of the applicant and other family members listed on the application, in present and prior housing.

The history of the applicant's conduct and behavior must reasonably demonstrate that the applicant family can be expected not to:

- a) Interfere with other residents in such a manner as to diminish the peaceful enjoyment of the premises by adversely affecting their health, safety, or welfare; [24 CFR §960.205(b)]
- b) Adversely affect the physical environment or financial stability of the community; [24 CFR §960.205(b)]
- c) Violate the terms and conditions of the lease;
- d) Require services from IHA staff that would alter the fundamental nature of IHA's program.

- 3. IHA will conduct a detailed interview of all applicants using an interview checklist. The form will ask questions based on the essential elements of tenancy. Answers will be subject to third party verification. [24 CFR §960.206(a) & (b)]
- 4. IHA will complete a credit (covering the prior 2 years) and rental (covering the prior 2 years) history check on all applicants.
- 5. Payment of funds owed to IHA is part of the screening evaluation. Payment of outstanding balances is an opportunity for the applicant to demonstrate an improved track record. IHA will consider any past balances owed IHA by the applicant for any program that IHA operates. IHA expects these balances to be paid in full (either in a lump sum or over a period of time) before initiating the full screening process. IHA will not admit families who owe back balances to IHA. (See §960.205 (b)(1))
- 6. IHA will complete a criminal background check on all applicants including other adult members of the household or any member for which criminal records are available. [24 CFR 960.205(b)(3)]
- 7. All applicants are required to attend and complete IHA's Pre-Occupancy Orientation Classes.

8. IHA's examination of relevant information respecting past and current habits or practices will include, but is not limited to, an assessment of:

- a) **CREDIT HISTORY** - A credit history will be obtained for all applicants and household family members 18 years of age and older. Applicants with "negative" credit history will be rejected and notified in writing of the rejection. Examples of "negative" credit include, but are not limited to, the following:
 - (i) Unpaid judgments relating to a prior tenancy.
 - (ii) Unpaid collection actions relating to a prior tenancy.

- b) **LANDLORD REFERENCES** - Previous landlords will be contacted regarding the applicant's previous rental history. Applicants with a "negative" landlord reference in the last two (2) years will be rejected and will be notified in writing of the rejection. "Negative" landlord references are defined as any of the following items:
 - (i) Court action for unsanitary or hazardous housekeeping;
 - (ii) Court action for disruptive or dangerous behavior, including disturbance of neighbors, destruction of property, and/or criminal activities;
 - (iii) Court action for non-compliance with rental/occupancy agreements (excluding non-payment of rent);
 - (iv) Evidence of drug-related or alcohol problems;
 - (v) Three (3) or more legal notices for non-payment of rent during any twelve (12) month period;
 - (vi) Outstanding balance due to the previous landlord; and
 - (vii) Evictions by the previous landlord (for any cause).

If no previous independent landlord reference is available for the last two (2) years, landlord references going back an additional five (5) years may be checked.

- c) **CRIMINAL HISTORY** - IHA will obtain a criminal background check for all applicants including other adult household members. Applicants and/or family members with a "negative" criminal history will be rejected. Examples of "negative" criminal history include, but are not limited to, the following:
 - i) Arrest and/or conviction for any felony;
 - ii) Arrest and/or conviction for physical violence against persons or property;
 - iii) Arrest and/or conviction for the manufacture, distribution or illegal use of drugs, drug paraphernalia or classified controlled substances.

- iv) Arrest and/or conviction for any crime related to larceny, burglary and robbery.
 - v) Arrest and/or conviction for the use or sale of firearms or any gang-related activity;
 - vi) Arrest and/or conviction for any crime related to rape, sexual deviate behavior, molestation or prostitution;
 - vii) Arrest and/or conviction for alcohol or alcohol-related incidents; and
 - viii) Any criminal acts which would adversely affect the health, safety, or welfare of other residents or staff or cause damage to the apartment or the development. [24 CFR §960.205(b)(3) and the Anti-Drug Act of 1988].
 - ix) Outstanding warrants and current probation status are included. Probationary matters will be reviewed on a case by case basis to determine time served and whether in good standing with the conditions of probation.
- d) An applicant's intentional misrepresentation of any information related to eligibility, award of preference for admission, housing history, allowances, family composition or rent will result in rejection. [24 CFR §913.109(b) & §760.3]
 - e) Applicants must be able to demonstrate the ability and willingness to comply with the terms of IHA's lease, either alone or with assistance, which they can demonstrate that they have or will have at the time of admission. Availability of assistance is subject to verification by IHA.

9. Home Visits (Only Applicable to Concord, Eaglecreek, and Laurelwood Communities)

- a) Home visits at the current dwelling of the applicant shall be required of all qualified applicants being housed at Concord, Eaglecreek, and Laurelwood Communities. Housekeeping inspections are part of the home visit.
- b) Housekeeping criteria shall include, but not be limited to:
 - i) Conditions in living room, kitchen (food preparation and clean up), bathroom and bedrooms.
 - ii) Conditions of entranceways, halls and yard.
 - iii) Cleanliness of each room.
 - iv) General care of furniture, appliances, fixtures, windows, doors and cabinets.
- c) Other IHA lease compliance criteria will also be checked, such as:

- i) Evidence of destruction of property.
- ii) Unauthorized occupants.
- iii) Evidence of criminal activity.
- iv) Conditions inconsistent with application information.

The purpose of the home visit is to obtain information to be used in determining the applicant's compliance with Applicant Screening Criteria.

10. Screening applicants who claim mitigating circumstances.

- a) If unfavorable information is received about an applicant, consideration shall be given to the time, nature, and extent of the applicant's conduct and to factors that might indicate a reasonable probability of favorable future conduct. Factored into IHA's screening assessment of the applicant, mitigating circumstances must be verifiable. [24 CFR §960.205(d)]
- b) Mitigating circumstances⁸ are facts relating to the applicant's record of unsuitable rental history or behavior, which, when verified, would indicate both: (1) the reason for the unsuitable rental history and/or behavior; and (2) that the reason for the unsuitable rental history and behavior is no longer in effect or is under control, AND applicant's prospect for lease compliance is an acceptable one, justifying admission. Mitigating circumstances would overcome or outweigh information already gathered in the screening process.
- c) If the mitigating circumstances claimed by the applicant relate to a change in disability, medical condition or course of treatment, IHA shall have the right to refer such information to persons qualified to evaluate the evidence and verify the mitigating circumstance. IHA shall also have the right to request further information reasonably needed to verify the mitigating circumstance, even if such information is of a medically confidential nature. Such inquiries will be limited to the information necessary to verify the mitigating circumstances or, in the case of a person with disabilities, to verify a reasonable accommodation.
- d) Examples of mitigating circumstances might include: [24 CFR §960.205 (d)]:
 - i) Evidence of successful rehabilitation;

⁸ The discussion of mitigating circumstance in this paragraph is applicable to all applicants. IHA is required by regulation to consider mitigating circumstances, see 24 CFR Sec.960.205(d)(1).

- ii) Evidence of the applicant family's participating in social service or other appropriate counseling service;
 - iii) Evidence of successful and sustained modification of previous disqualifying behavior.
- e) Consideration of mitigating circumstances does not guarantee that applicant will qualify for admission. IHA will consider such circumstances in light of:
- i) the applicant's ability to substantiate through verification the claim of mitigating circumstances and his/her prospects for improved future behavior; and
 - ii) the applicant's overall performance with respect to all the screening requirements; and,
 - iii) the nature and seriousness of any criminal activity, especially drug-related criminal activity that appears in the applicant's record.

11. Qualified and Unqualified Applicants

- a) Verified information will be analyzed and a determination made with respect to:
 - i) Eligibility of the applicant as a family; (See 24 CFR §912.2)
 - ii) Eligibility of the applicant with respect to income limits for admission; (See 24 CFR §913.104 & 105)
 - iii) Eligibility of the applicant with respect to citizenship or eligible immigration status; [24 CFR §912.4(b)]
 - iv) Apartment size required for the family;
 - v) Preference category (if any) to which the family is entitled; (See 24 CFR §960.211)
 - vi) Qualification of the applicant with respect to the Applicant Selection Criteria. (See 24 CFR §960.205)

NOTIFICATION OF ELIGIBILITY

- b) Families determined to be qualified will be notified by IHA of the approximate date of occupancy insofar as that date can be reasonably determined. [24 CFR §960.207(b)]

- c) Assistance to a family may not be delayed, denied or terminated on the basis of the family's ineligible noncitizen status unless and until the family completes all the verification and appeals processes to which they are entitled under both INS and IHA procedures. [24 CFR §912.9]
- d) IHA will make every effort to accurately estimate an approximate date of occupancy. However, the date given by IHA does not mean that applicants should expect to be housed by that date. The availability of a suitable apartment to offer a family is contingent upon factors not directly controlled by IHA, such as turnover rates, and market demands as they affect bedroom sizes and community location. [See 24 CFR §960.207(b)]

12. Opportunity for Informal Review

- e) Applicants determined unqualified for admission will be promptly notified in writing. These applicants will receive a Notice of Rejection from IHA, stating the basis for such determination. IHA shall provide such applicants with an opportunity for informal review of the determination. The informal review of applicants should not be confused with the resident grievance process. Applicants are not entitled to use of the resident grievance process. [24 CFR §960.207(a)]

J. Occupancy Guidelines

1. It is IHA's policy that unit occupancy should be by families of the appropriate size. This policy maintains the usefulness of the units, while preserving them from excessive wear and tear or under utilization.
2. The following general apartment maximum and minimum number of persons per apartment will govern the assignment of a family of a given size and composition. These are only guidelines and the maximums may be exceeded at the request of the family, or because of the square footage of a specific apartment:

a. Occupancy Guidelines Chart

Number of Bedrooms	Min Persons/Apartment	Max Persons/Apartment
1 Bedroom	1	2
2 Bedrooms	2	4
3 Bedrooms	3	6
4 Bedrooms	4	8
5 Bedrooms	5	10

3. Exceptions to the maximum standards may be made in case of reasonable accommodations for a person with disabilities, emergencies, and at the discretion of the Executive Director or designee. Further, IHA has the right to permit families exceeding the maximums shown above to occupy units when the family requests such occupancy, and when IHA determines that the apartment in question is large enough.
4. Families may request, in writing, to be placed on the waiting list for an apartment one-bedroom size smaller than that designated on the chart. A family that chooses to occupy a smaller size apartment must agree not to request a transfer until their family size changes.
5. Families will not be placed on the waiting list for a larger apartment unless there is a verifiable medical reason or IHA determines reasonable.
6. An unborn child may be counted as a person in determining apartment size. A single pregnant woman may be assigned to a two-bedroom apartment. In assigning an apartment IHA will also consider a child who is temporarily away from the home because of placement in foster care or kinship care.
7. Dwelling units will be assigned so that:
 - a) It will not be necessary for persons of different generations or opposite sex, other than husband and wife, to occupy the same bedroom. Exceptions may be made for infants and young children or at the written request of the family.
 - b) For verified reason of health (disability, addition of a live-in aide, need for medical equipment, etc.), a separate bedroom may be provided for an individual family member.
 - c) Two children of the opposite sex (where one or both are 5 years of age or older) will not be required to share a bedroom except at the written request of the family.
 - d) The living room will not be used as a bedroom except at the written request of the family.
 - e) A single head of household parent shall not be required (but may choose) to share a bedroom with his/her children.

IMPORTANT: The above options will be discussed with each applicant family. Families will also be updated as to the status and movement of each bedroom size waiting list maintained by IHA. Families shall be asked to declare in writing the bedroom size list on which they wish to be placed. If a family opts for a

smaller apartment size than would normally be assigned under the above standards (because, for example, the list is moving faster), the family will be required to sign a statement agreeing to occupy the apartment assigned at their request until their family size or circumstances change.

K. Policy statement on resident participation

- a) IHA's policy is to encourage resident participation in the applicant screening process. Further, IHA recognizes that screening is only a part of the occupancy cycle. For IHA resident partnership to be effective, work is required both before and after admission. [Permitted at 24 CFR §960.206 c)]
- b) Given this policy IHA, in conjunction with its resident leaders, proposes the following areas of involvement:
 - i) Home Visits - Objective: to work with residents and establish home visit inspection standards. To train residents on the standards and use residents to conduct the home visits as required by this policy.
 - ii) Applicant Pre-Occupancy Orientation - Objective: Attendance at a Pre-Occupancy Orientation session will be a requirement of screening. IHA and its residents will develop the agenda for this orientation to include topics such as:
 - rights and responsibilities of IHA and the resident;
 - how rent is calculated;
 - security issues;
 - re-certification requirements;
 - the lease;
 - the move-in inspection;
 - care of the apartment and how to request maintenance;
 - reasonable accommodations for persons with disabilities;
 - services available in or near the development;
 - the resident association;
 - how to conserve utilities and read a utility bill; family budgeting.

Residents and IHA staff will design and deliver the orientation. Applicants must attend the orientation in order to complete the screening process.

IHA and the residents for each of the areas mentioned will establish specific procedures. The procedures will provide working details so that residents and staff understand the relationship and goals for each area of participation. The following

process will be used to nominate persons for participation in the activities described above:

- i) IHA and the resident organizations will nominate a slate of impartial persons to be involved in the activity. Such persons may include IHA staff members, residents, professional arbitrators, or others. IHA will check with each nominee to determine whether there is an interest in serving, whether nominee feels fully capable of impartiality, whether the nominee can serve without compensation, and what limitations on the nominee's time would affect such service.
 - ii) Nominees will be informed that they will be expected to disqualify themselves from participating in applicant rejection meetings that involve personal friends, other residents of developments in which they work or reside, other family members, or matters in which they have some personal interest.
8. A slate of potential team members nominated by IHA will be submitted to the resident organizations for final review. After the resident organization review, IHA will subsequently contact participants and set up the necessary training programs prior to implementing the procedure.

L. Organization of the Waiting List

It is IHA's policy that each applicant shall be assigned his/her appropriate place on each community's waiting list in sequence based upon date and time of application as well as applicable preferences. Preference and priority factors are established in this policy in accordance with HUD regulations (24 CFR §§912.3, 945.303, 960.211, and 960.401) and are consistent with the objectives of Title VI of the Civil Rights Act of 1964 and Title VIII of the Civil Rights Act of 1968 and the HUD regulations and requirements pursuant thereto. [24 CFR §1.4(b)(2)(II) & 100] Exceptions to IHA waiting list will be permitted only to comply with Court Orders, Settlement Agreements, or when approved in advance by the Assistant Secretary for Fair Housing and Equal Opportunity.

IHA will maintain separate site based waiting lists for the HOPE VI funded developments, Concord and Eagle Creek Homes, Tibbs Court, pursuant to the authority granted by the Quality Housing and Work Responsibility Act of 1998.⁹ Applicants to IHA housing may apply to IHA's centralized list and up to two of the sites maintaining a site based waiting list, but they must meet the specialized screening criteria in order to qualify for residency in the above developments. As a matter of convenience, this Policy typically refers to a "waiting list," rather than the centralized list

⁹ IHA will may implement site-based waiting lists for other sites after going through a notice and comment process in order to amend this Policy.

and the site-based lists, but the discussions of the procedures relating to the waiting list apply to both categories.

M. Method of Applicant Selection

1. IHA will first match the characteristics of the applicant to the apartment available, including any priorities for admission required for accessible housing. Applicable preferences as described earlier in this policy will then be used to determine the order of selection from the waiting list. [Required 24 CFR §§945.303 & 960.407] Further, in the selection of a family for an apartment with accessible features IHA will give preference to families that include a person with disabilities who can benefit from the apartment features. [24 CFR §8.27]
2. Each qualified applicant first in sequence on the waiting list is made one offer of an apartment of appropriate size. The applicant must accept the vacancy offered or be dropped to the bottom of the qualified applicant list. 2nd refusal of apartment will result in applicant being “dropped from the list” [24 CFR §1.4(b)(2) i and iii]
3. The applicant must accept the vacancy offered within 2 working days of the date the offer is communicated (by phone, mail or the method of communication designated by the applicant) or, be dropped from the qualified applicant list. (See good cause discussion below) Letter to the applicant will confirm offers made over the phone.
4. “Dropped from the list” shall mean the applicant will lose standing by being removed from the waiting list. Once “dropped from the list” applicants must wait for 6 months before reapplying to the public housing program.
5. If an applicant is willing to accept the apartment offered, but is unable to move at the time of the offer and presents to the satisfaction of IHA clear evidence (“good cause”) that acceptance of the offer of a suitable vacancy will result in undue hardship or handicap not related to considerations of race, color, sex, religion or national origin, the applicant will not be dropped from the list. [24 CFR §1.4(b)(2) i and iii]
6. Examples of good cause reasons for the refusal of an offer of housing include, but are not limited to:
 - a) Inaccessibility to source of employment or children’s daycare such that adult household member must quit a job, drop out of an educational institution, or job training program;
 - b) Presence of lead paint in the apartment offered when the applicant has children under the age of six (6) years old;

- c) The family demonstrates to IHA's satisfaction that accepting the offer will result in a situation where a family member's life, health or safety will be placed in jeopardy. The family must offer specific and compelling documentation such as restraining orders, other court orders, or risk assessments related to witness protection from a law enforcement agency. Reasons offered must be specific to the family. Refusals due to location alone are not good cause.
 - d) A health professional verifies temporary hospitalization or recovery from illness of the principal household member, other household members or live-in aide necessary to the care of the principal household member.
 - e) The apartment is inappropriate for the applicant's disabilities.
 - f) An elderly or disabled family makes the decision not to occupy or accept occupancy in designated housing. [24 CFR §945.303(d)]
7. The applicant must be able to document that the hardship claimed is good cause for refusing an offer of housing. Where good cause is verified to IHA's satisfaction, the refusal of the offer shall not require that the applicant be dropped from the waiting list or otherwise affect the family's position on the waiting list. [24 CFR §85.42]
 8. IHA will maintain a record of units offered, including location, date, and circumstances of each offer, and each acceptance or rejection, including the reason for the rejection.

N. Occupancy of Dwelling Units with Accessible or Adaptable Features [See 24 CFR §8.27(a)(1)(2) and (b)]

1. Before offering a vacant accessible apartment to a non-disabled applicant, IHA will offer such units:
 - a) First, to a current occupant of another apartment of the same development, or other public housing developments under IHA's control, having a disability that requires the special features of the vacant apartment (in effect, a transfer of the occupant with disabilities from a non-adapted apartment to the vacant accessible/adapted apartment).
 - b) Second, to an eligible qualified applicant on the waiting list having a disability that requires the special features of the vacant apartment.
2. When offering an accessible/adaptable apartment to a non-disabled applicant, IHA will require the applicant to agree to move to an available non-accessible apartment within 30 days when either a current resident or an applicant needs the features of

the apartment. This requirement will be reflected in the lease agreement signed with the applicant.

O. Leasing and Occupancy of Dwelling Units

It is IHA's policy that all units must be occupied pursuant to a lease that complies with HUD's regulations (24 CFR Part 966). All leases must have 12-month terms and are automatically renewable except for noncompliance with the community service requirements that is not cured within the following 12 months.

1. **Applicant folders will be processed at initial intake. The site property management staff in agreement with site base waiting list requirements will make initial intake, waiting list management, screening, and offers of housing. Offers may be made in person, by phone, or in writing.**
2. When offering units, IHA will provide the applicant with a brief property description and other information to help orient the applicant to the community and location in the property. Staff making offers will be familiar with IHA's housing sites. If the applicant preliminarily accepts the offer of an apartment, site staff will schedule a date to show the apartment with the applicant and the community manager of the property.
3. Once the apartment is shown and the applicant accepts the apartment, the security deposit and all the rent is paid, the manager will execute a lease. If the applicant refuses the apartment, the reason for refusal must be obtained in writing from the applicant. The applicant must sign the "Apartment Offer and Refusal form". The Regional Manager reviews the form and gives a "good cause" determination. No applicant will be expected to sign a lease for an apartment that is not ready for occupancy. [See §966.4 I]
4. Applicant is required to report changes in family composition, income, or status between the time of the interview with the applicant and the showing of the apartment. The change will be processed centrally or at the community where applicant applied. The necessary information will be obtained and processed for placement in applicant's file. IHA staff shall not lease units to families whose occupancy will create an over or under housed situation. (Over-housed, family is too small for the apartment; under-housed, family is too large for apartment.)
5. The lease shall be signed by the head, spouse, and all other adult (18 years and older) members of the household accepted as a resident family and by an authorized representative of IHA, prior to actual admission. [24 CFR §966.4(p)]
6. If a resident transfers from one IHA apartment to another, a new lease will be executed for the dwelling into which the family moves. [24 CFR §966.4c(3)]

7. If at any time during the life of the lease agreement, a change in the resident's status results in the need for changing or amending any provision of the lease, either:
 - a) A new lease agreement will be executed, or
 - b) A Notice of Rent Adjustment will be executed, or
 - c) An appropriate rider will be prepared and made a part of the existing lease, or appropriate insertions made within the lease. All copies of such riders or insertions are to be dated and signed by the Resident and an authorized representative of the Housing Agency. [24 CFR §966.4(o)]
8. Only those persons listed on the most recent re-certification form shall be permitted to occupy a dwelling apartment. [24 CFR Secs.960.209(b) and 966.49(a)(2)] Except for natural births to family members, any family seeking to add a new member must make the request to management in writing for approval prior to the new member occupying the apartment. [24 CFR §966.4(f)(3) & c(2)]
9. Additions to the household - Following receipt of a family's request for approval, IHA will conduct a pre-admission screening of the proposed new member. Only new members approved by IHA following the screening process will be added to the household. The results of screening shall be used to determine whether or not to admit the new member. Children born to a family member, children under the age below which Juvenile Justice records are not made available, who are adopted by a family member or who are added through a kinship care arrangement are exempt from the pre-admission screening process. The exemption age specified in this paragraph is subject to change should the State or locality modify its laws concerning the availability of police or court records for juvenile offenders.
10. Examples of situations where the addition of a family member is subject to screening are:
 - a) Resident plans to be married and files a request to add the new spouse to the lease;
 - b) Resident is awarded custody of a child over the age for which juvenile justice records are available;
 - c) Resident desires to add a new family member to the lease, employ a live-in aide, or take in a foster child (ren).
 - d) An apartment is occupied by a remaining family member(s) under age 18 (and not an emancipated minor) and an adult, not a part of the original household, request permission to take over as the head of the household.

Note: All changes in family composition must be reported in 10 days from the date of the change, whether adult or minor.

- e) Family member takes custody or guardianship over minor children who reside.
- 11. Residents who fail to notify IHA of additions to the household will be in violation of the lease. Residents who permit persons to join the household without undergoing screening are also in violation of the lease. Such persons will be considered unauthorized occupants by IHA and the entire household will be subject to eviction.
- 12. Family members over age 18 who move from the dwelling apartment to establish new households shall be removed from the lease. The resident has the responsibility to report the move-out within 30 calendar days of its occurrence. These individuals may not be re-admitted to the apartment and must apply as a new applicant for placement on the waiting list (subject to applicable income limits, preferences, resident selection, and screening requirements). Medical hardship, or other extenuating circumstances shall be considered by IHA in making determinations under this paragraph.

P. Resident Transfers

- 1. Objectives of the Transfer Policy:
 - A. To fully utilize available housing resources while avoiding overcrowding by insuring that each family occupies the appropriate size unit.
 - B. To facilitate a relocation when required for modernization or other management purpose.
 - C. To facilitate relocation of families with inadequate housing accommodations.
 - D. To eliminate vacancy loss and other expense due to unnecessary transfer.

It is IHA 's policy that transfers will be made without regard to race, sex, sexual orientation, color, religion, national origin, or familial status. Residents may be transferred to accommodate a disability. (24 CFR S 100.5)

Residents will not be transferred to a dwelling apartment of equal size within IHA sites or between other IHA sites except to alleviate hardship of the resident or other undesirable conditions as determined by the Executive Director, or designee.

IHA has three types of transfers:

- Emergency
- Administrative – Category 1
- Administrative – Category 2.

2. Resident Transfer Criteria:

- a) Emergency Transfers are permitted when the apartment or building conditions pose an immediate threat to resident life, health or safety, as determined by IHA. Emergency transfers within sites or between sites may be made to repair apartment defects hazardous to life, health, or safety, alleviate verified medical problems of a life threatening nature, or, based on documentation provided by a law enforcement agency, protect members of the household from attack by the criminal element in a particular property or community. These transfers shall take priority over new admissions.
- b) Administrative transfers – Category 1: Include transfers to remove residents who are witnesses to crimes and may face reprisals (as documented by a law enforcement agency), provide housing options to residents who are victims of hate crimes or extreme harassment, alleviate verified medical problems of a serious nature, permit modernization of units, or permit a family that requires an apartment with accessible features to occupy such an apartment. These transfers shall take priority over new admissions.
 - i) Request for medical transfers under Administrative Transfer-Category 1 will be made to the Community Manager. The Resident will provide the Community Manager with the necessary verification and/or documentation to substantiate the need for a medical transfer. Whenever feasible, transfers will be made within a resident's area. Medical transfers may also be initiated by IHA. (e.g., moving a person with mobility problems to an apartment with accessible features).
- c) Administrative transfers – Category 2: within sites or between sites may be made to correct occupancy standards (over/under housed conditions), to correct and avoid concentration of the most economically and socially deprived families, to facilitate income-mixing, and to address situations such as neighbor disputes that are not criminal but interfere with the

peaceful enjoyment of the apartment or common areas. These transfers will not take priority over new admissions.

- i) Transfers to correct occupancy standards may be requested or recommended in writing at the time of re-examination or interim re-determination. This is the only method used to determine over/under-housed status. Residents will be granted a preference and place on the waiting list ahead of other applicants who do not qualify for a preference.
- ii) Residents in an over/under housed status will be advised in their 30 day "Notice of Rent Adjustment" that a transfer is recommended and that the family has been placed on the transfer list. Upon approval of transfer; the tenant and the Community Manager affected by the transfer should be notified. Residents will be granted a preference and placed on the waiting list ahead of other applicants who do not qualify for a preference. This will avoid unfair treatment of applicants with qualifying dependents who have waited for a unit longer than the existence of a resident's new dependent.
- iii) When a head of a household, originally housed in a bedroom by him/herself, has a child, that child shall remain in the parent's bedroom until it is five (5) years of age. After age 5 a Category 2 administrative transfer may be recommended. **Exceptions:** spouse or partner returns to the apartment, marriage takes place, or family decides to remain in the apartment and in IHA's opinion the apartment is large enough to accommodate the number of persons now in the household. (Other than for births that occur during tenancy, IHA's prior approval of additions to the household is required.)

3. Resident History Requirement for Transfers

- e) The 3-prong "good standing criteria" is required for a transfer – residents will be considered for transfers if they:
 - i) Have not engaged in any activity that threatens the health and safety of residents and staff;
 - ii) Do not owe back rent or other charges, or evidence a pattern of late payment; or
 - iii) Meet reasonable housekeeping standards and have no housekeeping lease violations.

- Exceptions to the good record requirements may be made for emergency transfers, or when it is to IHA's advantage to move forward with the transfer.
- f) Without a determination of exception the following policy applies to transfers:
 - i) If back rent is owed, the resident will not be transferred until a payment plan is established or, if prior payment plans have failed, back rent is paid in full with approval of the Executive Director or his/her designee.
 - ii) A resident with housekeeping standards violations will not be transferred until he/she passes a follow-up housekeeping inspection for a period of 30,60, and 90 days from the date the transfer request was submitted.
 - g) Incentive Transfers – IHA may occupy recently modernized and scattered site units through incentive transfers. Depending on IHA's vacant apartment status, modernized units will be filled with incentive transfers, new applicants, or a combination of both. IHA reserves the right to fill modernization units in a manner that has the least impact on vacant units.
 - h) A resident's requests for incentive transfers should be made to the Community Manager. Community Managers may also recommend a resident for an incentive transfer. In order for a resident to be considered for an incentive transfer the following conditions must be met:
 - i) Residency in an IHA development for at least five (5) years.
 - ii) No repayment agreement or unpaid balance at any time in the past three (3) years.
 - iii) No history of disturbances that resulted in lease violation or violence toward staff or neighbors as indicated by notices of lease violation in the resident's file.
 - iv) Good housekeeping record.
4. Cost of transfers – Residents shall bear the cost of transfers to correct occupancy standards. Transfers requested or required by IHA will be paid for by IHA. In addition to the out-of-pocket moving expenses, resident's will be required to pay a "transfer fee". A "Transfer Fee" list will be posted in IHA offices and is based on our contract price for maintenance and an administrative charge for processing the transfer. The "Transfer Fee" list is updated annually by IHA. IHA will charge the actual cost of the transfer, which includes the administrative cost, the cost of preparing the apartment for re-rental and, if applicable, a penalty for not turning in the keys to the old apartment within three (3) days of the transfer. The resident is allowed a period of three (3) days to move and turn in the keys to the old apartment

without being charged a penalty. If the move takes more than three (3) days and the keys are not turned in the resident will be charged a penalty of \$10 per day for each day the keys are not turned in to IHA. Prior to the transfer IHA will perform an inspection on the current apartment to determine the amount of charges the resident will be required to pay as a result of resident caused damages, if any. All transfer charges must be paid at the time the resident signs his/her lease and receives the keys for the new apartment. The Landlord will perform a final inspection with the resident on the apartment that the resident transferred from, after the keys are turned in, and a final determination will be made by IHA staff regarding charges that may be due to IHA. For example, the resident may not have cleaned the apartment properly and/or damaged the apartment during the moving process. If there are any charges that are due IHA, as a result of this inspection, the resident must pay for these damages within fourteen (14) days of written notice from IHA. The resident must sign a transfer agreement after IHA has authorized the transfer and prior to the transfer. All transfer fees must be paid prior to transfer.

The Community Manager has the responsibility to obtain and document all pertinent information relative to a request for transfer.

5. Resident Transfers, Administrative Requirements

- a) Transfers will be processed at a central location. The Department of Housing Management will maintain a central transfer list.
- b) Chief Property Manager will review all transfer requests and make recommendations to the Director of Housing Management or designee. Final approval must come from the Director of Housing Management or designee.
- c) If approved, residents will receive one offer of a transfer. Refusal of that offer without good cause will result in the removal of the household from the transfer list.

SECTION X ELIGIBILITY FOR CONTINUED OCCUPANCY, ANNUAL RE-EXAMINATION, AND REMAINING FAMILY MEMBERS

A. Eligibility for Continued Occupancy

Residents who meet the following criteria will be eligible for continued occupancy:

1. Qualify as a family as defined in Section 1 of this policy. (Note: for purposes of continued occupancy remaining family members qualify as family. Remaining

family members can also include court ordered emancipated minors under the age of 18.)

2. Are in full compliance with the resident obligations and responsibilities as described in the dwelling lease.
3. Whose family members, age 6 and older, each have Birth Certificates and Social Security numbers or have certifications on file indicating they have no Social Security number.
4. Who are citizens or have eligible noncitizen status. Every member of a resident family must submit either evidence of citizenship or eligible noncitizen status as required by 24 CFR §912.6.
5. Comply with the community service requirement.

B. Remaining Family Members and Prior Debt

As a party to the lease, remaining family members (other than the head or spouse) 18 years of age or older will be responsible for all arrearages incurred by the former head or spouse. IHA will not hold remaining family members (other than the head or spouse) responsible for any portion of the arrearage incurred prior to the remaining family member attaining age 18.

C. Redetermination of Family Income and Composition

1. Regular redetermination.
 - a) Income-based Rent - IHA shall, at least once a year, re-examine the incomes and composition of all resident families and must make adjustments in rents after consultation with the family and verification of the information. (24 CFR §960.209(a) and 24 CFR section 5.617);
 - b) Flat Rents – IHA shall recertify every three (3) years, however all changes of family composition and income are to be reported annually.
 - c) Community Service and Economic Self-Sufficiency Requirement – For non-exempt families, IHA shall determine compliance with the community service and economic self-sufficiency requirements in 24 CFR 960 Subpart F
2. Special Re-examinations. When it is not possible to estimate projected family income with any degree of accuracy at the time of admission or regular re-examination, a temporary determination will be made with respect to income and a special re-examination will be scheduled every 90 days until a reasonably accurate estimate of income can be made. The resident will be notified in advance as to the

date for the special re-examination(s). Special re-examination shall also be conducted when there is a change in the head of household that requires a remaining family member to take on the responsibilities of a leaseholder.

3. Interim Redetermination. Upon the submission of a signed change if income/family composition for an interim redetermination based on the change in family income or composition will be completed. IHA will make the redetermination within a reasonable time after the family's request. The adjustment will be made even if the income change will not last a full year.

4. Re-examination Procedures

- a) Employment, income, allowances, Social Security numbers, and such other data as is deemed necessary will be verified, and all verified findings will be documented and filed in the resident's folder. [24 CFR §960.206]
- b) Verified information will be analyzed and a determination made with respect to:
 - i) Eligibility of the resident as a family or as the remaining member of a family;
 - ii) Apartment size required for the family;
 - iii) Income based rent; and
 - iv) Resident's choice of rental payment
- c) Income shall be computed in accordance with the definitions and procedures set forth in this policy. [24 CFR §913]
- d) Families failing to respond to the initial, and second notice of the re-examination appointment will be issued a final appointment within the same month. Failure to respond to the final request will result in the family being sent a Notice of Lease Violation by the Community Manager for failure to comply with the terms and conditions of occupancy required by the lease. Failure to comply will result in rent being raised to the fair market Flat Rent established by IHA effective the annual date. Continued failure to respond will result in the termination of the lease. [24 CFR §966.4 (c)(2)]

5. Action Following Re-examination

- a) If there is any change in rent, the lease will be amended, a new lease will be executed or a Notice of Rent Adjustment will be issued. [24 CFR §966.4(c) & (o)]

- b) If any change in the apartment size is required, the resident will be placed on a transfer list in accordance with the transfer criteria described above.

SECTION XI RENT, INCOME and UTILITIES

Rent [24 CFR 5.603, 5.614]

1. Resident's Choice of Rental Payment

- A. In order to maximize family choice, IHA gives residents the annual option to pay either an income-based rent or a flat rent. IHA will provide sufficient information for an informed choice. Such information will include the dollar amounts of resident rent for the family under each option and IHA's policy on switching type of rent in circumstances of financial hardship.

- 1. **Income-based Rents.** Income based rents, including applicable utility allowance, shall not exceed the highest of 30% of the family's monthly-adjusted income, or the 10% of the family's gross monthly income. Income will be calculated as set forth in this policy.

The income-based rent has a minimum rent of \$50 (including any amount for utilities). IHA will grant exceptions to the minimum rent requirement to any family where the minimum rent is higher than the income-based rent or the family is unable to pay due to financial hardship as listed below.

- a) Residents qualify for a financial hardships exemption if one of the following conditions exist:
 - i) Family has lost eligibility or is awaiting eligibility under a federal, state, or local assistance programs;
 - ii) Family would be evicted as a result of imposition of minimum rent;
 - iii) Family income has decreased due to changed circumstances, including loss of employment;
 - iv) Death in the family; or
 - v) Other circumstances determined by IHA or HUD.
- b) IHA will immediately suspend the minimum rent requirement while verifying hardship or determining its duration. If IHA cannot verify the hardship or determines that is temporary, IHA will reinstate the minimum rent and will develop a repayment plan for the family.
- c) If IHA determines that there is a qualifying hardship, but it is temporary, IHA will reinstate the minimum rent from the time of suspension. IHA will not evict the family for nonpayment of the minimum rent in excess of rent otherwise payable during the 90-day period beginning the date the family

requested an exemption. IHA will offer the family a reasonable repayment agreement for the amount of back rent owed.

- d) If IHA determines there is no qualifying hardship exemption, IHA will reinstate the minimum rent including the back payment for minimum rent from the time of suspension on terms and conditions established by IHA.
- e) Appeal of financial hardship determination. A family who appeals a financial hardship determination through the public housing grievance procedure is exempt from any escrow deposit requirement in the grievance procedure.

2. Flat Rents

Residents may choose a flat rent that has been established based on a reasonable market value as calculated on an annual basis. The flat rents will be posted in each community.

A. Rent Adjustments

1. Switching. Residents choosing the flat rent option may switch to income based rents in the case of financial hardship.

Residents qualify under a financial hardship requirement, if one of the following conditions exists:

- i) loss of reduction of income;
- ii) death in the family or loss of assistance;
- iii) increase in the family's expenses for medical costs, childcare, transportation or education.

Note: In order to qualify for switching from flat rent to income-based rent, the resident must notify and provide verification of the condition to IHA.

2. Rent Adjustments by IHA

The Flat Rent amount may be re-calculated every two years by IHA; however, if the resident opts for flat rent as the rent of choice, the flat rent amount will remain for three (3) years. For families who choose the flat rent, the family must still report any changes in income.

- a. The minimum ceiling rent as calculated by IHA will be adjusted annually to reflect operating expenses as reported on the Statement of Operating

Receipts and Expenditures as of the end of the most recent fiscal year and be determined in conjunction with HUD guidelines.

Residents must report all changes in family composition, status, or income to the Community Manager within 10 calendar days of the occurrence. Failure to report within the 10 calendar days may result in a notice of Lease violation.

Not all changes in family income between re-examinations will result in a rent change.

Residents that obtain work for the deferral of income and then quit work to avoid being employed at the next regular reexamination will be considered as misrepresenting the facts and subject to retroactive increases as described below. Residents with seasonal or part time employment of a cyclical nature will be asked for third party documentation of the circumstances of their employment including start and ending dates.

For those residents who opt for income based rent, IHA will process an interim adjustment in rent if it is found that the resident at an annual or interim re-examination has misrepresented the facts upon which the rent is based so that the rent the resident is charged is less than what would have been charged. IHA will apply any increase in rent retroactive to the first of the month following the month in which the misrepresentation occurred.

Limits on rent increases.

IHA will not increase rent for 12 months based on additional income that is derived from:

- i) employment of a family member who was previously unemployed for one year or more;¹⁰
- ii) participation of a family member in a self-sufficiency or other job training program; or
- iii) assistance during the previous 6 months under any state program for temporary assistance for needy families as provided in Part A of Title IV of the Social Security Act;

Phase-in of rent increases. Upon expiration of the 12-month moratorium on rent increases, IHA will only increase rent payable by the resident in the following 12 months by not more than 50% of the rent increase amount.

Complete justification and verification of the circumstances applicable to rent adjustments must be documented by the resident and approved by the Chief Property Manager or his/her designee. [24 CFR §960.206]

¹⁰ Unemployed refers to anyone who did not work over 10 hours for 50 weeks at the minimum wage.

IHA will process interim adjustments in rent in accordance with the following policy:

- (a) When a decrease in income is reported, and the management office receives confirmation that the decrease will last less than 30 days, an interim adjustment will not be processed.
- (b) Residents reporting decreases in income that are expected to last more than 30 days will have an interim adjustment processed.

Residents granted a reduction in rent under these provisions may be required to report for special re-examinations at intervals determined by the Community Manager. Reporting is required until the circumstances cease or until it is time for next regularly scheduled re-examination, whichever ever occurs first. If family income increases during this time, the rent will be increased accordingly. A fully documented record of the circumstances and decision shall be included in the resident's folder.

IHA will not make rent adjustments where there have been income changes as a result of a reduction in welfare benefits based on:

- a) fraud by a member of the family;
- b) family's failure to comply with the welfare program's requirement for work activities or participation in an economic self-sufficiency program. IHA will not treat the following conditions as a failure to participate in an economic self-sufficiency program:
 - i) expiration of life time limit
 - ii) family sought but could not find work; or
 - iii) family completed program but loss benefit due to duration time limits (24 CFR section 5.618)

B. Effective Date of Adjustments

Residents will be notified in writing of any rent adjustment and such notice will state the effective date of the adjustment.

1. Rent decreases go into effect the first of the month following the reported change, provided the change in income or circumstances was reported within ten (10) days of the date of the decrease occurrence.
2. Rent increases (except those due to misrepresentation) require 30 days written notice and will go in to affect the first of the month following the thirty-day notice.

C. Failure to Report Accurate Information and/or Failure to Report in Timely Manner

If it is found the resident has misrepresented or failed to report to Management the facts upon which his/her rent is based so that the rent being paid is less than what should have been charged, then the increase in rent will be made retroactive. Failure to report accurate information is also grounds for initiating eviction proceedings in accordance with IHA 's dwelling lease [24 CFR §966.4 (1)(2)] and the lease terms.

Households that fail to report information in a timely manner, or who otherwise do not comply with the agency's annual recertification process, will be raise to the flat rent.

D. Notice Requirements

1. No resident shall be given a Notice of Lease Termination (30 day notice) without being told by IHA in writing the reason for the termination. The resident must also be informed of his/her right to request a hearing in accordance with the Grievance Procedure, and be given the opportunity to make such a reply as he / she may wish. Certain actions are excluded from the Grievance Procedure, specifically: criminal activity that threatens the health, safety, or right to peaceful enjoyment of the premises of other residents or IHA employees; and any drug-related criminal activity on or off such premises. [24 CFR §966.4 (1)(3)]
2. Notices of lease termination can be served personally, and if posted to the apartment door, shall also be sent to the resident by Certified Mail. Return of the Certified Mail receipt, whether signed or unsigned shall be considered proof that the resident received proper notification.
3. The notice shall include a statement describing the resident's right to meet with the Community Manager and determine whether a reasonable accommodation could eliminate the need for the lease termination.

E. Recordkeeping Requirements

A written record of every termination and/or eviction shall be maintained by IHA in the appropriate resident file, and shall contain the following information:

1. Name of resident, number and identification of apartment occupied;
2. Date of the Notice of Lease Termination and any other notices required by State or local law; these notices may be on the same form and will run concurrently;
3. Specific reasons for the notices, citing sections of the lease, and other facts pertinent to the issuing of the notices described in detail;
4. Date and method of notifying resident; and

5. Summaries of any conferences held with resident including dates, names of conference participants and conclusions.

F. Resident-Paid Utilities

In all IHA developments, which require residents to pay the cost of utilities directly to the supplier of utilities, each resident's rent is reduced by a utility allowance that is developed by IHA in consultation with the utility supplier and reviewed by HUD. [24 CFR §965 & 966.4 (b)(2)]

The following requirements apply to residents living in developments with resident-paid utilities or applicants being admitted to such developments:

1. When the supplier of utilities offers a "Budget" or level payment plan, it shall be suggested to the resident to pay his/her bills according to this plan. This protects the resident from large seasonal fluctuations in utility bills and ensures adequate heat in the winter.
2. **Third-Party Notification** – When a resident makes application for utility service in his / her own name, he or she must sign a third-party notification agreement so that IHA will be notified if the resident fails to pay the utility bill.
3. **Ability to get utilities connected** – If a resident or applicant is unable to get utilities connected because of a previous balance owed the utility company at a prior address, resident/applicant will not be permitted to move into an apartment with resident paid utilities. This may mean that a current resident cannot transfer to a scattered site or that an applicant cannot be admitted to an apartment with resident-paid utilities.
4. **Payment Requirements-Resident Paid Utilities** – Paying the utility bill is the Resident's obligation under the Agency's lease. Failure to pay utilities is grounds for eviction.

G. Excess Utility Charges

Residents in units where IHA pays the utilities may be charged for excess utilities if additional appliances or equipment are used in the apartment (e.g. window air conditioners). This charge shall be applied as specified in the lease. [24 CFR §966.4(b)(2)]

H. Definitions and Procedures to be used in determining Income and Rent

1. Annual income. Annual income is the anticipated total income from all sources, including net income derived from assets, received by the family head and spouse (even if temporarily absent) and by each additional family member including all net income from assets for the 12-month period following the effective date of initial determination or re-examination of income, exclusive of income that is temporary, non-recurring, or sporadic as defined below or is specifically excluded from income by other federal statute. Annual income includes but is not limited to:

The full amount of wages and salaries, overtime pay, commissions, fees, tips, bonuses, and other compensations for person services, before any payroll deductions:

- i) The net income from operation of a business or profession, including any withdrawal of cash or assets from the operation of the business. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining the net income from a business. An allowance for the straight line depreciation of assets used in a business or profession may be deducted as provided in IRS regulations. Withdrawals of cash or assets will not be considered income when used to reimburse the family for cash or assets invested in the business;
- ii) Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for the straight-line depreciation of real or personal property is permitted. Withdrawals of cash or assets will not be considered income when used to reimburse the family for cash or assets invested in the property. Where the family has Net Family Assets in excess of \$5000, annual income shall include the greater of the actual income derived from all Net Family Assets or a percentage of the value of such Assets based on the current passbook savings rate as determined by HUD;
- iii) The full amount of periodic payments received from social security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts.
- iv) Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation, and severance pay.
- v) All welfare assistance payments received by or on behalf of any family member. (See 24 CFR §913.106(b)(6) for welfare rules applicable to "as-paid" states);

- vi) Periodic and determinable allowances, such as alimony and child support payments, and regular cash contributions or gifts received from persons not residing in the dwelling.

2. Anticipating Annual Income [24 CFR 913.106 (d)] If it is not feasible to anticipate income for a 12-month period, the Agency may use the annualized income anticipated for a shorter period, subject to an Interim Adjustment at the end of the shorter period. (This method would be used for teachers who are only paid for 9 months or for tenants receiving unemployment compensation. IHA will use the following deductions to calculate adjusted income.

a. Mandatory Deductions:

- i) Dependent Deduction – An exemption of \$480 for each member of the family residing in the household (other than the head of household, or spouse, live-in aide, or foster child) who is under eighteen years of age or who is eighteen years of age or older and disabled, handicapped, or a full-time student.
- ii) Elderly/Disabled Household Deduction – A deduction of \$400 for any elderly or disabled household.
- iii) Earned Income Deduction- A deduction for the earned income of a family member or foster child (other than the family head or spouse) who is under eighteen years of age.
- iv) Child Care Deduction – Reasonable child-care expense, BUT ONLY when such care is necessary to enable a family member to be gainfully employed or to further his / her education. Amounts deducted must not be reimbursed expenses and shall not exceed: (a) the amount of income earned by the family member released to work; or (b) an amount determined to be reasonable by IHA when the expense is incurred to permit education.
- v) Unreimbursed Expenses Deduction – A deduction for the following unreimbursed expenses to the extent that the sum of these amounts exceed 3% of annual income and provided that the amount so calculated does not exceed the employment income earned:
 - Unreimbursed medical expenses for any elderly or disabled family. Medical expenses include but are not limited to services of physicians and other health care professionals, services of health care facilities, insurance premiums (including the cost of Medicare), prescription and non-prescription medicines, transportation to and from

treatment, dental expenses, eyeglasses, hearing aids and batteries, attendant care (unrelated to employment of family members), and payments on accumulated medical bills. To be considered by IHA for the purpose of determining a deduction from income the expenses claimed must be verifiable;

- Attendant care or auxiliary apparatus expenses for each disabled family member where such expenses are necessary to permit family member(s), including the disabled member, to be employed. Equipment and auxiliary apparatus may include but are not limited to wheelchairs, lifts, reading devices for the visually handicapped, and equipment added to cars and vans to permit their use by the handicapped or disabled family member.

b) Permissive Deductions;

- i) Payments received for the care of foster children or foster adults (usually individuals with disabilities, unrelated to the resident family, who are unable to live alone);
- ii) Lump sum additions to family assets, such as inheritances, insurance payments (including payments under health, and accident insurance, and worker's compensation) capital gains, and settlement for personal property losses;
- iii) Amounts received by the family that are specifically for, or in reimbursement of the cost of medical expenses for any family member;
- iv) Income of a live-in aide, provided the person meets the definition of a live-in aide. (See Section IV Definition of Terms);
- v) The full amount of student financial assistance paid directly to the student or the educational institution.
- vi) The special pay to a family member serving the Armed Forces who is exposed to hostile fire;
- vii) Community Service and Self-Sufficiency Deductions
 - Amounts received under HUD funded training programs (e.g. Step-Up program; excludes stipends, wages,

transportation payments, child care vouchers, etc. for the duration of the training);

- Amounts received by a person with disabilities that are disregarded for a limited time for purposes of Supplemental Security Income and benefits that are set aside for use under a Plan to Attain Self-Sufficiency (PASS);
- Amounts received by a participant in other publicly assisted programs which are specifically for, or in reimbursement of, out-of-pocket expenses incurred (special equipment, clothing, transportation, child care, etc.) to allow participation in a specific program;
- A resident services stipend. A resident services stipend is a modest amount (not to exceed \$200/month) received by a public housing resident for performing a service for the IHA, on a part-time basis, that enhances the quality of life in public housing. Such services may include but are not limited to, fire patrol, hall monitoring, lawn maintenance, and resident initiatives coordination. No resident may receive more than one such stipend during the same period of time.
- Compensation from State or local employment training programs and training of family members as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for a limited period as determined in advance by the PHA.

- viii) Temporary, non-recurring, or sporadic income (including gifts);
- ix) For all initial determinations and re-examination of income on or after 23 April 1993, reparation payments paid by foreign governments pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;
- x) Earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of household and spouse);
- xi) Adoption assistance payments in excess of \$480 per adopted child;
- xii) The earnings and benefits to any resident resulting from the participation in a program providing employment training and

supportive services in accordance with the Family Support Act of 1998 (42 U.S. C. 1437 et seq.), OR any comparable Federal, State or local law during the exclusion period. For purposes of this paragraph the following definitions apply:

- Comparable Federal, State or local law means a program providing employment training and supportive services that (a) is authorized by Federal, State or local law; (b) is funded by the Federal, State, or local government; (c) is operated or administered by a public agency; and (d) has as its objective to assist participants in acquiring employment skills.
 - Exclusion period means the period during which the resident participates in a program described in this section PLUS 18 months from the date the resident successful completion of such program that **IS NOT** funded by public housing assistance under the U.S. Housing Act of 1937 (42 U.S.C.1437 *et. seq.*). If the resident is terminated from employment without good cause, the exclusion period shall end.
 - Earnings and benefits mean the incremental earnings and benefits resulting from a qualifying employment training program or subsequent job.
- xiii) Deferred periodic payments of supplemental security income and social security benefits that are received in a lump sum payment.
- xiv) Amounts received by the family in the form of refunds or rebates under state or local law for property taxes paid on the dwelling apartment.
- xv) Amounts paid by a State agency to a family with a developmentally disabled family member living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home.
- xvi) Amounts specifically excluded by any other Federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under the United States Housing Act of 1937. (A notice will be published and distributed when necessary.) The following is a list of benefits excluded by other Federal statute as of 3 August 1993

- The value of the allotment provided to an eligible household for coupons under the Food Stamp Act of 1977 [7 USC 2017(h)].
- Payments to volunteers under the Domestic Volunteer Service Act of 1973 [42 USC 5044(g), 5088].
- Examples of programs under this Act include, but are not limited to:
 - The Retired Senior Volunteer Program (RSVP), Foster Grandparent Program (FGP), Senior Companion Program (SCP), and the Older American Committee Service Program;
 - National Volunteer Antipoverty Programs such as VISTA, Peace Corps, Service Learning Program, and Special Volunteer Programs;
 - Small Business Administration Programs such as the National Volunteer Program to Assist Small Business and Promote Volunteer Services to Persons with Business Experience, Service Corps of Retired Executives (SCORE), and Active Corps of Executives (ACE).
- Payments received under the Alaska Native Claims Settlement Act [43 USC 1626(a)]
- Income derived from certain sub-marginal land of the United States that is held in trust for certain Indian tribes [(25 USC 459e).
- Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program [42 USC 8624(f)].
- Payments received under programs funded in whole or in part under the Workforce Investment Act (PL 105 – 220) (29 USC. 2801)
- Income derived from the disposition of funds of the Grand River Band of Ottawa Indians (Pub. L. 94-540, 90/state 2503-04);
- The first \$2000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the

Court of Claims by the Secretary of Interior [25 S.C. 117b, 1407]; and

- Amounts of scholarships funded under Title IV of the Higher Education Act of 1965 including awards under the Federal work-study program or under the Bureau of Indian Affairs student assistance programs [20 USC 1087 uu]
- Examples of programs under this act include but are not limited to: Pell Grants, Supplemental Opportunity Grants, State Student incentive Grants, College Work Study, and Byrd Scholarships.
- Payments received after January 1, 1989 from the Agent Orange Settlement Fund or any other fund established in the *In Re Orange* Product liability litigation, M.D. L. No.381 (E.D.N.Y.)
- Payments received under the Maine Indian Claims Settlement Act of 1980 (Pub. L. 96-240, 94 Stat. 1785)
- The value of any child-care provided or arranged (or any amount received as payment for such care or reimbursement for cost incurred for such care) under the Child Care and Development Block Grant Act of 1990. (942 USC. 9858q)

Earned income tax credit refund payments received on or after January 1, 1991 (26 USC 32(j)).

SECTION XII. RESIDENT COMMUNITY SERVICE REQUIREMENT

A. Community Service and Economic Self Sufficiency

This Policy includes requirements and incentives to encourage Community Service and facilitate self-sufficiency among residents. IHA will determine which family members are subject to the community service and self-sufficiency requirement and approve the resident's planned activities to fulfill the requirement. Annually, IHA will review and determine the compliance of each adult member of the family with the community service requirement at least 30 days before lease term expires and determine any changes to each adult family members exempt or nonexempt status.

1. Community Service. Community service is the performance of voluntary work or duties in the public sector that serve to improve the quality of life and/or enhance resident self-sufficiency, and/or increase the self-responsibility of the resident within

the community in which the resident resides. Political activity is excluded. IHA will not substitute community service for work ordinarily performed by IHA employees or replace a job at any location where community work requirements are performed.

2. Economic Self-Sufficiency Program. Residents can satisfy the community service requirement by participating in economic self-sufficiency activities. These include any program designed to encourage, assist, train, or facilitate the economic independence of participants and their families or to provide work for participants. These programs may include programs for job training, employment training, work placement, basic skills training, education, English proficiency, work fare, financial or household management, apprenticeship, and any program necessary to ready a participant to work (such as substance abuse or mental health treatment).
3. Exemptions. IHA will permit an exemption to the community service and economic self-sufficiency requirement for adults demonstrating their membership in any of the following categories:
 - a) 62-years or older;
 - b) Persons engaged in work activities (as defined in § 407 (d) of the Social Security Act 42 U.S.C. 607 (d) as in effect on or after July 7, 1997.);
 - c) Persons participating in a welfare to work program or receiving assistance from and in compliance with a state program funded under Part A Title IV of the Social Security Act. (42 U.S.C. 607 (d) as in effect on or after July 7, 1997); or
 - d) Vision impaired persons or persons with other disabilities (as defined under 216 (i) or 1614 of the Social Security Act [42 U.S.C. 416 (i)(I)] that are in the judgement of IHA are unable to comply with the requirement, or who are the primary caretakers of such persons; or
 - e) Meets the requirements for being exempted from having to engage in a work activity under the State program funded under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.) or under any other welfare program of the State of Indiana, including the State-administered welfare-to-work program.
 - a) Determinations of noncompliance. If IHA determines that a non-exempt resident has not complied with the community service requirement, IHA shall notify the resident:
 - b) Of the noncompliance;
 - c) That the determination is subject to IHA's administrative grievance procedure;
 - d) That unless the resident enters into an agreement under paragraph (d) of this section, the lease of the family of which the non-compliant adult is a member may not be renewed and that if the non-compliant adult moves from the apartment, the lease may be renewed; and

- e) That before the expiration of the lease term, IHA shall offer the resident an opportunity to cure the noncompliance during the next twelve-month period; such a cure includes a written agreement by the non-compliant adult to complete as many additional hours of community service or economic self-sufficiency activity needed to make up the total number of hours required over the 12 month term of the lease.

SECTION XIII. LEASE TERMINATION AND EVICTIONS

All Lease terminations and evictions will be processed in accordance with IHA's current dwelling lease and Grievance Procedure. IHA's Dwelling Lease and the Grievance Procedure is incorporated into this document by reference and is the guideline to be used for lease terminations and evictions. The dwelling lease may not cover every specific situation that warrants a lease termination; therefore, for good cause IHA may terminate a lease for reasons that are not specifically listed in the dwelling lease.

SECTION XIV. COMPLAINTS AND GRIEVANCE PROCEDURES

Complaints and Grievance Procedures shall be accomplished in accordance with IHA approved Grievance Procedure. The grievance procedure is incorporated into this document by reference and is the guideline to be used for grievances and appeals.

SECTION XV. SECURITY DEPOSITS

A security deposit shall be made pursuant to schedules posted in the community offices. Security deposits may be refunded as provided by law, in the lease, and in this procedure.

SECTION XVI. PET RULE

1. IHA chooses not to publish rules except those attached to this policy governing the keeping of common household pets (Refer to Section 5.315(b) Content of pet rules: general requirements - public housing programs). Residents will comply with their dwelling lease provisions surrounding these rules.
2. Exclusion from this policy is made for animals that assist persons with disabilities. The resident or prospective resident must certify in writing that the resident or a member of his or her family is a person with a disability; The animal has been trained to assist persons with that specific disability (example, seeing eye dog); and the animal actually assists the person with a disability.

SECTION XVII. ADDITIONAL IHA POLICIES & CHARGES

Additional policies and charges are attached to the end of this document and are incorporated as if fully set out herein. These policies and charges may be changed from time to time, or amended, and such changes or amendments shall be substituted in this document so as to keep this policy current. All items substituted within this document shall be kept by IHA in a separate file for historical and research purposes.

SECTION XVIII. COMPLIANCE WITH EQUAL OPPORTUNITY REQUIREMENTS FOR POSTING REQUIRED INFORMATION

There shall be maintained in IHA's office waiting room a bulletin board, which will accommodate the following posted materials:

- Statement of Policies and Procedures Governing Admission and Continued Occupancy Policy (ACOP) this policy also outlines IHA's resident selection and assignment plan.
- Open Occupancy Notice (Applications being Accepted and/or Not Accepted)
- Directory of Housing Communities including names, address of community offices, number of units by bedroom size, number of units specifically designed for the elderly, Handicapped, and office hours of all IHA facilities.
- Income Limits for Admission.
- Utility Allowances.
- Current Schedule of Routine Maintenance Charges.
- Transfer fees
- Schedule of flat rents.
- Dwelling Lease.
- Grievance Procedure.
- Fair Housing Poster.
- "Equal Opportunity in Employment" Poster.
- Any current "Resident Notices".
- Security Deposit Charges.

**AMENDMENT TO
ADMISSIONS AND OCCUPANCY POLICY GOVERNING
HUD-Aided Low Rent Public Housing Operated by
The Indianapolis Housing Agency**

The following Section IX(F) shall replace and supersede the existing Section IX(F) and shall be incorporated as a part thereof of the Indianapolis Housing Agency's Admissions and Occupancy Policy (ACOP). All other sections shall remain in force and effect until otherwise amended or repealed.

SECTION IX. RESIDENT SELECTION AND ASSIGNMENT PLAN

The Preference System

The IHA preference system is used to establish the order of placement on the waiting list, not to guarantee admission, and every applicant must still meet IHA's Resident Selection Criteria (described later in this policy) before being offered housing. There may be factors other than preferences that affect the selection of applicants from the waiting list.

Preferences will be granted to applicants who are otherwise qualified and who, at the time they are certified for admission, meet definitions of the preferences described below.

Preferences are based on local housing needs and priorities and are also used to encourage and promote self-sufficiency among residents. IHA will apply the following preferences. Subsection (a) shall receive the highest preference. All remaining subsections, however, shall be ranked equally:

National and/or State Disaster-Affected Families

Individuals or families displaced by a natural disaster, so declared by the President of the United States and/or the Governor of Indiana, shall receive preference. Priority will be given to individuals and families who were residents of public housing before being displaced by the disaster.

Employment and/or Participation in Work Training Programs.

While the Family is on the Waiting List- Employment of a previously unemployed family member, age 18 or older, at time of application or during processing of application that lasts at least 90 days and provides a minimum of 20 hours of work per week for the family member claiming the preference.

At the Time of Offer- Employment of a previously unemployed family member, age 18 or older, employed at the time of IHA's offer of housing. Employment at the time of the offer must have been for a 90-day period immediately prior to the offer of housing and provide a minimum of 20 hours of work per week for the family member claiming the preference.

- Employment periods may be interrupted by to receive the preference, a family must have an employed family member prior to the actual offer of housing as described above.
- A family member that leaves a job after receiving the benefit of the preference will be asked to document the reasons for the termination. Someone who voluntarily terminates their employment (as opposed to layoff, or taking a new job) will be considered to have misrepresented the facts to the IHA and will lose their preference.
- The amount earned shall not be a factor in granting this local preference. The local preference shall also be available to a family if the head, spouse, or sole member is 62 or older, or is receiving Social Security Disability, or SSI benefits, or any other payments based on the individual's inability to work. [24 CFR 960.212 (b)(1)]
 - i) Job Training – IHA will give a local preference for a family that can verify, at the time of initial application or while on the waiting list, participation in a job training program or graduation from such a program. The family must notify IHA if it enters such a program while on the waiting list and provide documentation of participation to IHA such as attendance and program files. IHA will not grant this preference if the family fails to provide documentation. Notice and verification of the preference claim must be received prior to the actual offering of housing to claim this preference applicants must be in good standing with respect to attendance and program rules of the training program.

Elderly, Disabled, or Disability – Families with the head, spouse or sole member who is 62 years or older, or is receiving social security disability, or SSI benefits, or any other payments based on the individuals inability to work.

Substandard Housing - Currently live in substandard housing. To qualify for this preference, applicants must be homeless living in substandard housing at the time of the preference verification required by IHA.

Involuntary Displaced – The applicant has been involuntarily displaced and is not living in standard, permanent replacement housing (See Definitions); or the applicant will be involuntarily displaced within no more than six months from the date of any preference status certification by the family or verification of the family’s status by IHA. Families that receive an involuntary displacement preference because they will be involuntarily displaced within no more than six months of the date of preference status certification will lose the preference if they are not, in fact, displaced within six months.

IHA will not hold units vacant for prospective applicants with preferences, nor will it relax eligibility or screening criteria to admit otherwise unqualified applicants with preferences.

IHA will not give preferences to an applicant if any member of the applicant family is a person evicted during the past three years because of drug-related criminal activity from housing assisted under the 1937 Housing Act. IHA may give an admissions preference in any of the following cases:

Applicants must advise IHA at the time of initial application of any factors that may qualify them for a preference;

If IHA determines that the evicted person clearly did not participate in or know about the drug related criminal activity; or

If IHA determines that the evicted person no longer participates in any drug related criminal activity.

Administration of the Preferences

IHA requires that applicants certify to their qualification for preferences at the time of initial application.

At the time of initial application local preferences will be verified. Verification of local preferences must be adequate to satisfy all preference conditions as described in paragraph four (4) above.

If at the time of the initial application a preference is claimed, IHA will advise the family of the need to verify the claim. At the initial application interview, the family will be advised to notify IHA of any change that may affect their ability to qualify for a preference.

Applicants that are otherwise eligible and are certified or verified as qualifying for a preference will be placed on the waiting list in the preference applicant pool.

Families who claim a preference that do not qualify for a preference at the time of application will be notified in writing and advised of their right to an informal meeting as described below. If otherwise qualified, the family's application will then be placed on the waiting list in the appropriate non-preference category.

Applicants that certify/verify to a preference at the time of initial application must be able to verify their continued preference status prior to the offer of an apartment. Applicants that cannot verify continued preference status will lose their preference qualification and their standing on the waiting list.

Families that lose their original preference, but still qualify for another preference, will be placed on the waiting list in accordance with their current preference status. Families that cannot qualify for any of the preferences will be moved into a non-preference category, in a lower position on the waiting list based on date and time of IHA's completion of all necessary verification.

Qualifying for Preferences. Applicants may not qualify for this preference if they were a resident family and refused to comply with applicable program policies or procedures with respect to the occupancy of under-occupied and over-crowded units; or failed to accept a transfer to another housing apartment in accordance with a court decree or in accordance with the policies and procedures of a HUD approved desegregation plan.

Notice and Opportunity for a Hearing

IHA will provide a written notice of determination in those cases where an applicant does not meet the criteria for receiving a preferences. This notice shall contain a brief statement of the reasons for the determination and a

statement that the applicant has the right to request an informal hearing to review the determination.

If the applicant requests an informal hearing. IHA shall designate an officer or employee to conduct the hearing. This person may be the person who made the initial determination or reviewed the determination of his or her subordinate. A written summary of the meeting shall be made and retained in the applicant's file.

The applicant will be advised that he/she may exercise other rights if the applicant believes that illegal discrimination, based on race, color, religion, national origin, age, disability, or familial status has contributed to IHA's decision to deny the preferences.

Attachment J

Significant Amendment and Substantial Deviation Statement

“SUBSTANTIAL DEVIATION”

For purposes of its 5-year/1 year Plan, the Indianapolis Housing Agency defines “substantial deviation” as follows:

“ A significant, major, substantive and non-procedural change to 1) the implementation of core Agency operational commitments AND 2) which would fundamentally deviate from program commitments contained within IHA’s current 5 Year/1 Year Plan. To qualify as a “substantial deviation”, any and all modifications must qualify as and result in changes of fundamental program focus so inconsistent with IHA’s core mission, policy and process, as set forth within any current IHA Plan commitments, that it makes said Plan commitments obsolete, unnecessary and/or moot. Modifications to IHA Plan commitments, which do not change the general theme, scope, direction, policy, and/or comprehensive goals of a program, will be automatically qualified as “non-substantial deviations” of the Plan itself and/or in the purpose/intent of the Plan commitments, and therefore would not require further IHA action; including but not limited to, formal Plan amendment. Additionally, decisions to delay or accelerate the timing of any Plan initiative and/or program, within the relevant five (5) year planning cycle, shall not be deemed to be a Plan deviation (i.e. would qualify as a “non-deviation”), and under no circumstances would these decisions be considered to be a substantial Plan deviation. IHA reserves the right to interpret and apply this definition to determine whether an action or non-action qualifies as a “substantial deviation”, “non-substantial deviation” or “non-deviation” for purposes of this definition and as applicable to IHA’s program requirements.”

Attachment K

Community and Self- Sufficiency Policy & Procedure

Community Service Policy

Legislative Background:

The Quality Housing and Work Responsibility Act of 1998 requires that all non-exempt adult public housing residents (18 or older) contribute 8 hours per month of community service (volunteer work), or participate in 8 hours per month of economic self sufficiency activity, defined to include education, training, counseling, classes or some other activities that help an individual toward self-sufficiency and economic independence. A combination of community service and self-sufficiency program participation totaling 8 hours per month is allowed. (24 CFR 960.601) This requirement is also a part of the dwelling lease signed with all public housing residents of the Indianapolis Housing Agency (Dwelling Lease- Section Q - Community Service Requirements/Economic Self-Sufficiency Programs).

Policy Statement:

IHA requires public housing residents to verify compliance annually, at least 30 days before the expiration of the lease term. Self-certification by residents is not acceptable; third party verification must be provided by the entity with which the resident is performing the community service or training.

The provisions of the policy are not intended to be punitive, but rather considered as rewarding activity that will assist residents in improving their own and their neighbors' economic and social well-being and give residents a greater stake in their communities.

Under the provision of the law, noncompliance with the community service and self sufficiency requirement is a lease violation and is grounds for non-renewal of the lease at the end of a 12-month lease term, but not for termination of tenancy during the course of the 12-month term. The non-renewal of the lease will result in the issuance of a 30-day lease termination notice. Upon the issuance of the notice, the IHA will move to evict the non-compliant household.

Regulation Definitions:

Community Service - volunteer service that includes, but is not limited to:

- Unpaid service at a local community institution such as a school, church, hospital, clinic, recreation center, senior center, service organization, homeless shelter, hospice, meals program, public nursing home, disability advocacy organization, adult day care center, or child care center;
- Unpaid service with youth or senior organizations, including Boy and Girl Scouts, Boys and Girls Clubs, Police Athletic League (PAL), CICOA, Meals on Wheels;

- Unpaid service with a public park or recreation program, including youth sports programs;
- Unpaid service at IHA to help improve physical conditions including building clean-ups, neighborhood clean-ups, gardening, and non-paid time spent on caretaker duties;
- Unpaid service at IHA with children's programs or youth sporting events;
- Service at IHA to help with senior programs;
- Helping neighborhood groups, or community development corporations (CDCs) with special projects;
- Working with the local resident advisory council (ICEF), or resident management corporations, or senior clubs to assist other residents;
- Assisting in a literacy, self esteem program, or before or after school youth program;
- Assisting in Alcoholics Anonymous, Narcotics Anonymous, etc.
- Other volunteer service with non-profits, for example, 501(C)(3) organizations, providing community service programs.
- Political activity is excluded. This would include, but is not limited to, voter registration, campaign worker, and poll worker assignments.

Self-Sufficiency Activities - activities include, but are not limited to:

Family Investment Center programs

- Apprenticeships
- Hope VI activities and planning programs
- Household management, employment counseling, work placement programs required by the Department of Public Assistance
- Resident Opportunity and Self-Sufficiency Programs (ROSS)
- Job training programs
- College or university
- GED classes
- Substance abuse or mental health counseling
- English proficiency or literacy (reading) classes
- Budgeting and credit counseling
- Homeownership educational programs, or seminars (offered by IHA-MCCHO, and other community organizations)

Exempt Adult - an adult member of the family who

- Is 62 years of age or older;
- Has a disability that prevents him/her from being gainfully employed (Defined under 21 6(i) 1 or 1614 of the Social Security Act (42 U.S.C. 416(i)1;1382c));
- Is the caretaker of a disabled person;
- Is working at least 20 hours per week;
- Is participating in a welfare to work program; or

- Is receiving assistance from TANF and is in compliance with job training and work activities requirements of the program.

Each exempt adult member of the household must sign a Community Service Exemption Certification at each annual recertification, or if they become an "exempt adult" at any time between recertifications.

Requirements of the Program:

- The 8 hours per month may be either volunteer service, or self-sufficiency program activity, or a combination of the two.
- At least 8 hours of activity must be performed each month. An individual may not skip a month and then double up the following month, unless special circumstances warrant consideration. The Property Manager, or their designee, will make the determination of whether to allow, or disallow a deviation from the schedule. These must be communicated to the management staff in writing and done prior to the deviation.
- Activities must be performed within the Marion County community. The community service activities cannot be outside the jurisdictional area of IHA.

Resident Obligations:

At lease execution or recertification, all adult members (18 years, or older) must:

- Provide the certification form that they are exempt from the community service requirement if they qualify for an exemption, or
- Provide the certification form that they are in compliance with the community service requirement.

At each annual recertification, non-exempt family members must submit a completed certification form (available at each property management office) of activities performed over the previous twelve (12) months. This form will include places for signatures of supervisors, instructors, or counselors certifying to the number of hours contributed.

If a family member is noncompliant at recertification, he/she and the Head of Household will sign an agreement with IHA to make up the deficient hours over the next 12-month period. The entire household may be allowed to enter such an agreement only once during the household's entire tenancy. In order to be eligible for this arrangement, the lease-holder's household must be in "good-standing" (3 criteria for good standing = within the last 12 months, there were no failed housekeeping inspections, rent was current, and no lease warnings issued.)

If, during the 12-month period, a non-exempt person becomes exempt, it is his/her responsibility to report this to the property management office and provide documentation.

If, during the 12-month period, an exempt person becomes non-exempt, it is his/her responsibility to report this to the property management office. The IHA, or its designee, will provide the person with the Certification form, and a list of agencies in the community that provide volunteer, and/or training opportunities.

Management Obligations:

To the greatest extent possible and practicable, the IHA will

- ✓ Provide names and contacts at agencies that can provide opportunities for residents to fulfill these Community Service obligations.

- ✓ Provide the family with: the Community Service Exemption Certification Form, Community Service Compliance Certification Form, Record and Certification of Community Service and Self-Sufficiency Activities Form; and Caretaker Verification for Community Service Exemption Form, and a copy of this policy at the time of lease execution.

- ✓ The Property Manager will make the final determination as to whether or not a family member is exempt from the Community Service requirement. Residents may use the Grievance Procedure if they disagree with Property Manager's determination. (Section XIV of the Admission and Continued Operating Policy).

Enforcement for Non-compliance:

If there is noncompliance by a family member, the responsibility for enforcement will be with the Property Manager.

- At the annual recertification, the resident and household members will provide the Property Manager with the certification forms regarding community service. The Property Manager will review the exempt, or non-exempt status and compliance of family members.

- If IHA determines a family to be non-compliant, a notice of noncompliance is issued.

- If the family member is eligible and wishes to comply, the Property Manager will enter into an agreement with the non-compliant member to make up the deficient hours over the next twelve (12) month period. The resident, or household member, is allowed to enter into this agreement only once during the household's entire tenancy.

- If, at the next annual recertification, or during the interim time, the family member still is not compliant with the agreement, the lease will not be renewed and the entire family would be issued a 30-day lease termination notice by the Property Manager. A non-compliant member may agree to move out of the unit, and a new lease be signed with the family, amending its composition accordingly.

- The family may use the Grievance Procedure to appeal the lease termination or qualifications for exemptions, after attending an informal meeting with the Property Manager, or designee.

Reporting Requirements to HUD

The IHA must include information and compliance with the community service/ economic self-sufficiency program with the submission of the Agency Plan to HUD (24 CFR 903.7). In addition, the reporting on each public housing resident's status is included in the submission of HUD form 50058. The status is completed during the annual recertification process. Current status listings on the HUD form 50058 Section 3q-Meeting the community service requirement includes:

Yes No Pending Exception n/a

Attachment L

Pet Policy – Lease Addendum

Pet Policy – Lease Addendum

INTRODUCTION

The purpose of this Lease Addendum is to establish reasonable requirements and guidelines for pet ownership for family and elderly communities. This policy in all respects will pertain to elderly and family communities. However, the annual fee is waived in communities designated by HUD for elderly and disabled.

Pets are a serious responsibility and risk for each Resident in the Community. If not properly controlled and cared for, pets can disturb the rights of others and cause costly damages for which Residents may be held liable. Violation of Pet Policy Addendum constitutes a Violation of the Resident's lease agreement and will be subject to lease termination. This policy does not apply to physically handicapped residents who utilize a service animal as defined by Senate Bill No. 2046.

1. DWELLING UNIT DESCRIPTION:

Lease Holder: _____ Community Name _____

Dwelling Address: _____ Apt. # _____

2. PET DEPOSIT AND ANNUAL FEE:

A resident who desires to maintain a pet on the premises, must pay a pet deposit of \$200.00 and a \$75 annual fee for family and elderly communities. The pet deposit and annual fee must be paid prior to execution of the lease addendum. The annual fee is payable within 3 monthly installments. No pet shall be allowed in the unit prior to completion of this lease addendum.

The pet deposit is a one-time deposit and one deposit is required per unit. The pet deposit will be refunded by mail to the forwarding address provided by the Resident at move-out time, less any damages attributable to the resident's maintaining of any pets, after premises have been inspected by Management.

The annual fee shall be paid at the time of reexamination each year and shall be prorated if an animal is obtained before the scheduled reexamination and all proof of inoculations is provided. The annual fee is not reimbursable. If the pet dies, it may be replaced without having to pay another annual fee. The annual fee is not refundable.

3. DESCRIPTION OF PET: The following information must be provided:

NAME: _____

TYPE: _____

BREED: _____

LICENSE NO: _____ (required for cats and dogs only.)

DATE OF LAST VACCINATIONS: _____ (documentation must be provided.)

A picture of the pet must be provided to Management.

4. **DESCRIPTION OF ALLOWABLE PETS:**

No dangerous, vicious, non-domestic, or exotic pets (hereinafter referred to as “prohibited pet”), will be allowed.

Prohibited pets shall include, but not limited to Chow, Bull Dog, American Staffordshire Terriers (commonly known as Pit-Bulls), Queensland Heelers, Doberman, Mastiff, Boxers, Australian Shepherds, German Shepherds, Rottweiler, or any breed combinations of these mentioned.

No Snakes and Reptiles are permitted.

No ferrets, gerbals/hamsters, or other mice/rat-like animals are permitted.

No livestock, or Vietnamese (pot-belly) pigs are permitted.

Only authorized cats, dogs, caged birds, fish, and turtles are permitted inside dwelling unit. Dogs are not permitted within any high-rise community.

Caged birds, fish, and turtles do not require a pet deposit unless damages to a unit occurs due to said pet, in which case the resident will be notified that a pet deposit will be required and the resident will be notified that a deposit must be tendered within ten (10) days, or the pet at issue must be removed from the premises.

IHA has the right to amend the list of prohibited pets with a reasonable amount of time for review and public comment period. If a resident has been previously authorized to maintain a pet that is later added to the prohibited pet list through a community – wide notice of amendment, the resident shall have no more than ten (10) days to remove said pet from the premises without further notice.

5. **RULES AND REGULATIONS:**

Each resident must be a “resident in good standing” before the keeping of a pet is approved. “In good standing” is defined by IHA as:

- 1.) owing no rent balance, and
- 2.) two consecutive passed inspections, and
- 3.) not under lease termination action, or eviction order at the time of written requests and/or signing of the Pet Policy Addendum for Ownership.

All pets must be reported and registered with the Indianapolis Housing Agency. Adding a pet to the household must be requested in writing. Management must approve the addition of household pet and reserves the right to refuse permission to household members who do not meet the criteria as outlined in the Pet Policy Addendum.

There are to be no visiting pets present on IHA premises.

Visiting pets shall include all pets not previously approved in writing. Visiting pets constitutes unauthorized pet ownership. Resident agrees that animals present without permission of Management constitutes a violation of this Pet Policy Addendum and shall be considered grounds for termination of Dwelling Lease. Resident acknowledges and agrees that IHA shall have the right to remove any visiting pets without notice.

6. RESIDENT AGREEMENT:

- A. All pets must be reported, registered, and pre-approved with the Indianapolis Housing Agency. Pet owners are liable, as provided by law, for their pet's injury, pet's injury to others, and any personal property damage, or loss which may occur due to said pet.
- B. Pets must be licensed and inoculated as required by law. Resident shall supply veterinary verifications of inoculations attached to initial request of Pet Addendum. Also, proof of current licensing and vaccination shall be updated annually during resident's re-examination for eligibility and continued occupancy.
- C. No "prohibited pets" shall be allowed on the premises at any time.
- D. Only one (1) cat, OR one (1) dog is permitted per household. Pets shall not exceed 18 inches, or 30 pounds at full maturity. In the event a pet grows to exceed the size limitation, it will be necessary to remove the pet from the premises, or lease termination will occur. Fish aquarium size may not exceed 75 gallons and is required to be on a stand. There is a maximum of two (2) birds allowed and they must be in a cage at all times. There is a maximum of two (2) turtles allowed and they must be in an appropriate container at all times.
- E. Pets shall not be maintained for any breeding purposes. Cats and dogs MUST be spade/neutered by the age of 6 months. All cats must be front de-clawed by the age of 6 months. The evidence of this must be provided by a statement, or bill, from a licensed veterinarian and/or Human Society staff.
- F. All pets must be on a leash and with a collar, or in a carrier box and under the control of a responsible person when outside the unit. All leash laws apply. Pets shall not be tied to any fixed object outside the dwelling unit including grassy areas, T-walls, parking lots, or any part of the property. Pets are not allowed on the playgrounds, common areas, or community rooms. All authorized pets must be under the control of an adult.
- G. The feeding of stray animals shall be considered ownership of a pet without permission.
- H. Pet owners are responsible for prompt disposal of pet waste, as required by law. Failure to do so will result in a charge of \$5 per occurrence being assessed to resident's account. Pet owners are responsible for the prevention and the elimination of pet odors. Cat litter must be changed frequently and be within a waterproof/leakproof container. Cardboard boxes, bathtubs, and sinks are not allowable containers. Dogs and cats must be housebroken as soon as the animal's age and maturity allow. Residents are responsible for maintaining animals in a clean and sanitary environment.
- I. Pet owners must refrain their pets from disturbing, interfering, or diminishing, the quiet enjoyment of other residents, as provided under this agreement. This includes, but is not limited to, unreasonable barking, chirping, biting, scratching, or attacking. If IHA, in its sole discretion, determines that complaints lodged under this provision become excessive,

IHA may require the household to remove the pet from the premises with ten (10) days notice. The resident may request a hearing, which will be handled according to IHA's established grievance procedures.

- J. If there is evidence of the following, within (1) day written notification – placed in a conspicuous place in the unit, Management may have the animal removed from premises by the Animal Control Division, as provided by law:
 - 1. Abandoned pet for extended period of time without food or water. Extended period of time is defined as 24 consecutive hours for a cat, or 12 consecutive hours for a dog.
 - 2. Failure to care for a sick, or diseased pet.
- K. Resident is required to secure all pets when Management service to the unit is required. Failure to properly secure the pet shall relieve IHA of its responsibility to immediately provide service. IHA will provide written notice of its inability to provide service to the unit and the date the service will be rescheduled. If the pet is not secured on the rescheduled date, the failure to secure will be deemed a lease violation and IHA reserves the right to remove said pet and /or take any actions available under the lease.
- L. A sign must be displayed in the front window nearest the front door of the dwelling to notify agency staff, and other visitors of the presence of a dog, or cat.
- M. Any involuntary removal of pets by IHA under these provisions will include transferring said animal to Animal Control at the sole cost of the resident. IHA shall bear no responsibility whatsoever for any costs incurred or damages claimed incidental to involuntary removal of pets. If any pet is involuntarily removed, said pet will be forever prohibited (“banned”) from any IHA property.
- N. Residents must provide IHA with the name, address, and telephone number of the individual responsible for the pet, in the event of a sudden illness, accident, death, or other emergency absence of the resident.
- O. Violation of Pet Policy Addendum constitutes a Violation of the Resident's lease agreement and will be subject to lease termination. The resident will be given ten days to make other arrangements for the pet, or the dwelling lease will be terminated. The resident may request a pet violation meeting, or hearing, which will be handled in agreement with the established grievance procedures.

Date pet approved by IHA

\$ _____
Pet deposit received

IN WITNESS WHEREOF, the parties hereto have signed and sealed this agreement on
This _____ day of _____, _____.

Resident Signature

Resident Signature

IHA Representative

Attachment M

Resident (ICEF) Comments

**Indianapolis Housing Agency
Annual Plan
Indianapolis Citizens Empowerment Foundation
Comments**

A. The first six (6) pages of the document that was presented to us, was the IHA's five year plan for fiscal years 2005 through 2009. We have the following comments on the five year plan information that was presented.

1. Section A lists the mission statement of the Indianapolis Housing Agency. The mission statement that is presented in the five year plan is somewhat vague.
IHA's mission statement is included in the 5-Year Plan section of form (HUD form 50075). To date, IHA has not revised their current mission statement.
2. We discussed the goals presented under Item B "Goals". The committee questions the statement that the voucher population needed to be increased by 5% annually.
Per HUD, no additional rental vouchers were available in 2005. Upon HUD notification, IHA will apply for additional vouchers at a rate of 5%.
3. The IHA did check the box under Item B indicating that the IHA was going to acquire or build units or developments. The IHA indicated that they were going to acquire or have ownership interest in a minimum of two development sites. It is suggested that the words "mixed finance" be added before the word "development".
The IHA is not implying that all future developments (acquiring or building) will be mixed-financed developments.

B. Annual Indianapolis Housing Agency Plan for Fiscal Year 2006

1. In the Executive Summary of the annual plan, the IHA has indicated that their goals include the achievement of a high performing status in both the public housing and Section 8 Programs. Since the IHA is currently troubled, we do not understand how they will be able to achieve the goal that is presented on page 1 of the annual plan within the fiscal year 2006. Please include a statement in the goals under the Executive Summary, that identifies how you will meet the goal that is stated in this section.
In order for the agency to achieve an ultimate goal of "High-Performance", IHA must set their annual goals (means) towards that achievement (ends). However, Please review Attachment G (2005-2009 Goal/Achievement Summary) for specific outcomes.

2. Under Strategy 2, the IHA indicates that the IHA will be reviewing the administration's public housing project based section 8 program. We understand that the IHA does not currently administer this program. IHA indicated that if legislation was passed enacting this or some similar program that the IHA would "likely" pursue the program. The ICEF Annual Plan Committee indicated that if the IHA would like to pursue the program, we feel that the IHA should say that they will pursue the program. We would like the words "would likely" be stricken and the word "will" be added.
Since the legislation has not been passed to convert public housing units into project-based section 8 units, IHA will need to review the legislation before pursuing the program.
3. On page 11, we discussed the fact that Indiana Avenue Development was the only elderly community that was specifically designated as housing for the elderly. Under strategy 1 under the elderly section, IHA indicated that they would seek designation of public housing for the elderly, if feasible, after an analysis of current senior sites that currently include elderly and disabled populations. ICEF would like the IHA to address why the Indiana Avenue site is the only site that has been specifically designated for elderly. We understand that there are problems at Lugar Tower, with the current population, and we would like the IHA to review whether Lugar Towers, Barton Towers, or Barton Annex should be designated as "Elderly Only".
As stated in the response under strategy 1 (Target available assistance to the elderly), IHA will consider additional designation for the elderly after a feasibility study of current senior sites is performed.
4. Strategy 2, on page 11 shows indication that the IHA wants to counsel public housing residents through the ROSS HHS Program and Section 8 clients with the Homeownership Voucher Program. We are unsure how counseling for homeownership is directly related to fair housing. IHA has further indicated that the IHA is not interested in developing public housing Homeownership Programs. Therefore, we question why this note is included in the Fair Housing Section, as you do not adequately address public housing homeownership under Section 11. Since the committee is making a recommendation that you do consider homeownership, this section may also be changed.
IHA plans to provide Homeownership counseling to prospective public housing and section 8 clients. Through this process, IHA clients will be educated on the opportunities and housing options throughout Marion County.

5. Section 2 on page 12 discusses the statement of financial resources. The planned sources and uses section is not completed. It is currently blank. Once this section is completed, please forward ICEF a copy of the completed statement, so we can review this information.
The Statement of Financial Resources is inclusive to the annual plan submission. ICEF is in receipt of this section (Statement of Financial Resources) of the annual plan.
6. In the section regarding eligibility, which is currently included on page 14, the IHA currently indicates that they verify eligibility for admission to public housing at the point of application. The committee felt that this was incorrect. We understand that the IHA verifies income at the point of application, but the IHA does not verify specific eligibility for admission to public housing, until the applicant is cleared from the waiting list.
IHA verifies eligibility (criminal background and credit check) at point of application. Once the applicant is pulled from the current waiting list for public housing, IHA conducts the income verification and if applicable, updates eligibility status.
7. In the section regarding deconcentration and income mixing on page 18, under Section 6, the IHA marked "yes" under the question "Did the PHA's analysis of its family (general occupancy) developments to determine concentrations of poverty indicate the need for measures to promote deconcentration of poverty of income mixing". We question that information, as well as the answer "no" to the question, "Did the PHA adopt any changes to its application admissions policies based on the results of the required analysis".

The ICEF Annual Plan Committee felt that the answer to b should be "yes", and that the answer to c should be "adoption of site based waiting listed".

The Annual Plan Committee also felt that an orientation policy should be written and the orientation package should be available at each of the sites to be presented to new residents as they move in. This would assist the incoming member in becoming familiar with the site, as well as the programs that are offered at the individual sites. The orientation information should include specific information regarding the resident organization that serves the site and the programs that are offered by the resident organization. The Annual Plan Committee indicated that they would discuss this with the Indianapolis Citizens Empowerment Foundation, and develop an orientation policy package and forward the package to the IHA for review.

The site-based waiting list is a component of the continued effort to institutionalize site-based management. In regards to section (6) deconcentration and income mixing, IHA's Admissions and Continued Occupancy Plan (ACOP) was not modified due to this process. However, the ACOP does address specific preferences (work and/or educational training) and site-based management allows for better monitoring of processes.

8. The IHA answered "yes" to the question regarding extensions on a standard 60-day period to search for a unit. This question was presented in Item B under Section 8(3) on page 18. The information indicates that if you mark "yes", you must state the circumstances below. There were no circumstances listed. We are suggesting that the IHA should indicate that the IHA does offer 60 day extensions on a case by case bases.
IHA states as a circumstance the following: At the written request of the family, IHA may extend the term of the voucher an additional 30 days.
9. On page 26, the IHA indicated that they completed an area market study in 2004 and lists the IHA flat rents. The committee indicated that since this annual plan was for the fiscal year 2006, that the market study for 2004 should not be used to set the flat rental rates.
IHA will consider the proposed flat rental rates based on the 2004 Market study, and conduct a 2006 market survey on current comparable rents.
10. The payment standards are discussed on page 26, Item (1). Are the current payment standards at or above 90% but below 100% of FMR or above 100% but at or below 110% of FMR?
The current payment standards are set at 90% of FMR.
11. Brokenbur Trails is named as the development that is included under Item B, HOPE VI on page 31. We understand that the new name will be Red Maple Grove. We suggest that you list Brokenbur Trails, but add "Red Maple Grove" in parenthesis, since the development number has not changed.
IHA will contact the HUD field office for guidelines on this matter.
12. The IHA indicates that they will be engaging in a mixed finance development for public housing in the plan year under Item (d) on page 31. The IHA indicates that this is also Brokenbur Trails, which is the answer to the HOPE VI question. In the five year plan section, the IHA indicated that they were going to be working on two mixed finance plans. These two statements seem to be inconsistent.

Brokenburr Trails re- development is both a HOPE VI and mixed-finance project. In 2006, 58 units will be built and dedicated as public housing units. IHA also is planning to embark on another mixed-finance project within the 5 year goal period.

13. Under the section regarding demolition and disposition, which is included under Item 8 on page 31, the IHA answered "yes" to the question of whether or not the IHA plans to conduct any demolition or disposition activities in the plan fiscal year. Since IHA indicated "yes", they must complete the activity description for each development that they are planning on demolishing or disposing of. This information has not been included in the activity description.
The Demolition/Disposition Activity description tables are completed with proposed projects.
14. Under Item 2 of the Demolition and Disposition Section presented on page 31, the IHA indicates that the IHA has not provided the activities description information in the public housing asset management table. The directions indicate that if you answer "no", which is the box that is marked, you must include the activity description table. The activity description table is currently blank. Please forward the information for the activity description table to us for review.
As stated above activity tables are completed for proposed projects.
15. Under Item 1 of the Designation of Public Housing Section presented in Section 9 on page 32, the IHA answered "yes" to the question regarding elderly designation. The IHA indicated that they have designated or applied for approval to designate or plans to apply to designate public housing for occupancy only by the elderly families or only by families with disabilities, or by elderly families and families with disabilities or will apply for designation for occupancy by only elderly families or only families with disabilities, or by elderly families and families with disabilities as provided by section 7 of the U.S. Housing Act of 1937 in the upcoming fiscal year. On Item 2, the IHA indicated "no" that the agency had not provided all required activity description information for this component in the optional public housing asset management table. It is then indicated that if you answered "no", that you should complete the table. The table has not been completed. If you are planning on applying for designation for elderly or elderly disabled or families with elderly and families with disabled, please indicate what properties you will be applying for.
Designation of Public Housing for Occupancy by Elderly Families with Disabilities or Elderly Families and Families with Disabilities, Section 9 question 1 is checked as NO to the above statement. Checking no to the above statement warrants no response to the activity description table.

16. Under Item 11, on page 35, which discussed the homeownership programs administered by the IHA, the IHA has marked "no" that they are not planning on completing any public housing homeownership programs. I. Linda Brockway, have been working, for several months, on the development of a public housing homeownership program for the Concord Homes Development. I indicated to Mr. Myers, that this program was ready for review, but we have not scheduled a meeting to sit down to discuss this program. Therefore, I truly believe that you should mark "yes" under Item 1 and "yes" under Item 2. You also need to indicate under Section 1a that the development name is "Concord". The development number for Concord should be included under Section 1b. We have completed the activity description section and have included this under Exhibit #B.

In 2006, IHA will consider taking initial steps to apply for administering a homeownership program that converts public housing unit into homeownership opportunities.

17. Under Item B, Section 8 Tenant Based Assistance homeownership program is discussed. Section 2(a) discussed the size of the program. The IHA marked the fact that they have limited the program. It is our understanding that you will not limit the size of the program, which is why the IHA has checked the box that indicates that they will be working with more than 100 participants. Ms. Kennedy indicated that she would check this information.

IHA will limit the size of its Section 8 homeownership program, which is why the box is checked "yes". If the answer to the above question is "yes", then you must choose the box that describes the number of participants, which are more than 100 participants.

18. Under Section 2(b), the IHA indicated that the program participants must be enrolled or willing to be enrolled in a Family Self Sufficiency Program. Some of the members of the committee thought that this was no longer a criteria for the homeownership program that is being sponsored under the Section 8 Program.

Section 8 Homeownership participants must be enrolled or willing to be enrolled in a Family Self-Sufficiency program.

19. Under the section regarding PHA safety and crime prevention measures, which is included under Item 13 on page 39, the committee feels that the IHA should check that the residents are fearful for their safety and/or the safety of their children. As discussed, this is a true and accurate statement. The resident organizations are receiving many complaints that residents are fearful for their safety and will not report any activities on the property for fear that it will affect their families.

IHA made that modification based on residents comments regarding safety.

20. Please list the Beechwood Development, the Indiana Avenue Development, Barton Annex, and Barton Towers to Item 13 (A3) on page 40.
The developments listed (Blackburn, Twin Hills and Laurelwood) are the public housing communities with the highest crime rate documented by the IHA, local and state police agencies.
21. Crime and drug prevention activities are discussed under Item B on page 40. The first and last box should be marked to indicate that the IHA has undertaken or plans to undertake crime and drug prevention activities in the next fiscal year. The first box includes Indiana Avenue, Barton Annex, and Barton Towers. This box should be marked, due to the fact that Indiana Avenue, Barton Annex, and Barton Towers have resident security programs. The resident security receives stipends. Therefore, it would be considered a contract.
Indiana Avenue is only community with a resident patrol. The residents are not under a contract.
22. The committee felt that these questions were answered incorrectly.
The appropriate boxes are checked with relative information stated.
23. Item 18(A0 of the section marked "other information" on page 42 questioned whether the IHA has received recommendations from the resident advisory board. The IHA did include a note that the IHA was going to receive comments from the advisory board, but the IHA did not mark "yes". Please mark the box "yes", to support carrying a note to that effect.
The appropriate box is checked to reflect resident comments as attached.
24. We discussed Item (3b) of Section B on page 43. The Annual Plan Committee questioned whether or not a resident of the Section 8 program could run for a seat on the Board of Commissioners. Currently, there is a resident representing the elderly and disabled development and a member representing the family developments.
IHA's general counsel is researching this matter. However, under the City ordinance Sec. 285-411 (b) – The member of the housing board shall be appointed as follows:
(1) Five (5) members appointed by the mayor...
(2) Two (2) members appointed by the council...
(3) Two (2) members appointed by the Indianapolis Housing Agency Resident's Council; one (1) shall be appointed from the family housing community and one (1) from the senior community.

** This documents reflects both written and verbal comments/suggestions. IHA met with the ICEF Executive Board on October 12, 2005.