

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

PHA Plans

5 Year Plan for Fiscal Years 2008 - 2012
Annual Plan for Fiscal Year 2008

NOTE: THIS PHA PLAN TEMPLATE (HUD 50075) HAS BEEN COMPLETED IN ACCORDANCE
WITH INSTRUCTIONS LOCATED IN APPLICABLE PIH NOTICE

Housing Authority of the County of Marin
Annual and 5-Year Agency Plan
 2008 – 2012

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PHA Plan

Agency Identification

PHA Name: Housing Authority of the County of Marin

PHA Number: CA052

PHA Fiscal Year Beginning: 01/01/08

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)

**Certification by State or Local Official of PHA Plans Consistency
With the Consolidated Plan**

I MATHEW HYMEL the County Administrator certify that the Five Year and Annual PHA Plan of the Housing Authority of the County of Marin is consistent with the Consolidated Plan of Marin County, California prepared pursuant to 24 CFR Part 91.

Matthew Hymel

Date: 10/17/07

LEAVE PAGE BLANK FOR BOARD OF COMMISSION APPROVAL

**Certification for
A Drug-Free Workplace**

**U.S. Department of Housing
and Urban Development**

Applicant Name

Housing Authority of the County of Marin

Program/Activity Receiving Federal Grant Funding

Capital Fund, Low-Rent Public Housing Operating, Section 8 Housing Choice Voucher Program (PHSEP-close-out)

Acting on behalf of the above named Applicant as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding the sites listed below:

I certify that the above named Applicant will or will continue to provide a drug-free workplace by:

- a. Publishing a statement notifying employees that the un-lawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's work-place and specifying the actions that will be taken against employees for violation of such prohibition.
- b. Establishing an on-going drug-free awareness program to inform employees ---
 - (1) The dangers of drug abuse in the workplace;
 - (2) The Applicant's policy of maintaining a drug-free workplace;
 - (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.
- c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;
- d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will ---
 - (1) Abide by the terms of the statement; and
 - (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
- f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---
 - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
- g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

Sites for Work Performance. The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above: Place of Performance shall include the street address, city, county, State, and zip code. Identify each sheet with the Applicant name and address and the program/activity receiving grant funding.)

| | | |
|-----------------------|---|-----------------------|
| Marin City | 429 Drake Avenue, Marin City, CA 94965 CA052001 | CF,PH, PHDEP Closeout |
| Venetia Oaks | 263 N. San Pedro Road, San Rafael, CA 94903 CA052002 | CF, PH |
| Homestead Terrace | 140 Linden Lane, Mill Valley, CA 94941 CA052003 | CF, PH |
| Casa Nova | 35 Carmel Drive, Novato, CA 94945 CA052004 | CF, PH |
| Golden Hinde | 5 Golden Hinde Boulevard, San Rafael, CA 94903 CA052006 | CF, PH |
| Kruger Pines | 47 N. Knoll Road, Mill Valley, CA 94941 CA052007 | CF, PH |
| Administrative Office | 4020 Civic Center Drive, San Rafael, CA 94903 | Section 8 |

Check here if there are workplaces on file that are not identified on the attached sheets.

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)

| | |
|--|---------------------------------|
| Name of Authorized Official Title Barbara Collins | Title Executive Director |
| Signature | Date (mm/dd/yy) 10/17/07 |

form HUD 50071 (3/98)

DISCLOSURE OF LOBBYING ACTIVITIES

Approved by OMB

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352 0348-0046

(See reverse for public burden disclosure.)

| | | |
|---|--|---|
| 1. Type of Federal Action: <input type="checkbox"/> B a. contract b. grant c. cooperative agreement d. loan e. loan guarantee f. loan insurance | 2. Status of Federal Action: <input type="checkbox"/> a a. bid/offer/application b. initial award c. post award | 3. Report Type: <input type="checkbox"/> a a. initial filing b. material changes For Material Change Only: Year _____ quarter _____ Date of last repost _____ |
| 4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Congressional District, if known: VI | 5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known: | |
| 6. Federal Department/Agency: U. S. Department of Housing and Urban Development | 7. Federal Program Name/Description: Capital Fund, Public Housing, Section 8 Housing Choice Voucher Program CFDA Number, if applicable: _____ | |
| 8. Federal Action Number if known: | 9. Award Amount, if known: \$ | |
| 10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI): <p style="text-align: center;">NONE</p> | 11. b. Individuals Performing Services (including address if (if individual, last name, first name, MI): different from No. 10a) (last name, first name, MI): <p style="text-align: center;">NONE</p> | |
| 11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be reported to the Congress semi-annually and will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure. | Signature: Barbara Collins Title: <u>Executive Director</u> Telephone No. (415) 491-2530 Date: 10/17/07 | |
| Federal Use Only: | | Authorized for Local Reproduction Standard Form LLL (Rev. 7-97) |

**Certification of Payments
to Influence Federal Transactions**

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

Applicant Name:

Housing Authority of the County of Marin

Program/Activity Receiving Federal Grant Funding

Capital Fund, Public Housing Operating Subsidy, Section 8 Housing Choice voucher Program
(and PHDEP closeout from prior year)

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form- LL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which

reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

I hereby certify that all the information stated herein, as well as any information in the accompaniments 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)

| | |
|--|---------------------------------|
| Name of Authorized Official Title Barbara Collins | Title Executive Director |
| Signature | Date (mm/dd/yy) 10/17/07 |

form HUD 50071 (3/98)

5-YEAR PLAN
PHA FISCAL YEARS 2008 - 2012
[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 assist very-low, low, and moderate income residents of Marin County to secure and maintain high quality affordable 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. In 2007, Marin Housing has added and modified its goals and objectives to include the new asset management regulations and meet the requirement that PHA improve management systems.

PHA Goal 1: Maximize Affordable Housing Options in Marin County

Subgoal 1.1 Fully Utilize Section 8 and Public Housing Programs

1. **2008** - Achieve 95% lease-up rate in Public Housing program.
5 Year: In the Public Housing Program achieve 98% lease-up rates annually as measured at fiscal year end.
2. **2008** - Maximize the number of individuals served by utilizing 100% of the money allocated by HUD for HAP payments. 5 Year: In the Section 8 Housing Choice Voucher Program maximize the number of individuals served by utilizing 100% of the money allocated by HUD for HAP payments.
3. **2008** - Assist 20 Section 8 Voucher holders to locate and successfully lease affordable housing. Most of these are Voucher holders who need to transfer to a new unit. 5 Year: Expand Assistline capability to provide housing search assistance to Section 8 Voucher-holders with one-to-one assistance projected for 100 Elderly Disabled clients over 5 years.
4. **2008** - Turn over 90% of all vacant Public Housing units within 20 days of the vacate date. 5 Year: Turn over 100% of all vacant Public Housing units within 20 days of the vacate date.

Subgoal 1.2 Preserve Existing Affordable Housing Stock

1. **2008** - Perform housing quality inspections using the UPCS standards on 100% of public housing units. 5 Year: Perform housing quality inspections using the UPCS standards on 100% of public housing units annually as measured at year end.

2. **2008** – Investigate and implement measures to improve public housing security through community involvement. 5-year: Work with Resident Council, various agencies, and law enforcement to investigate and implement measures to improve public security through community involvement.
3. **2008** - Perform 40 quality control inspections using the HQS requirements. 5 Year: In the Section 8 Housing Choice Voucher Program, perform 200 quality control inspections using the HQS requirements.
4. **2008**- Obtain FY 2006/2007 CDBG funding for the program and continue outreach. 5 Year: Secure annual funding for the Residential Rehabilitation Loan Program through the County's CDBG program and continue outreach through local jurisdictions and appropriate social service agencies.
5. **2008**- Undertake 10 rehabilitation projects averaging \$25,000 per home including one group home for a total of \$500,000 for the year. 5 Year: Complete 50 residential rehabilitation projects for low-income homeowners, including five group home rehabilitation projects over the five years.
6. **2008**- Subject to approval of the Waldo Point Harbor Master Plan by the County of Marin, commence applications for building permits and the start of rehabilitation for the first three houseboats. 5 Year: Participate in the planning and executing of the rehabilitation and relocation of the 38 Floating homes that comprise the Gates Co-Operative to permanent berths within the Waldo Point Harbor Marina in Sausalito.

Subgoal 1.3: Prevent Homelessness

1. **2008** - Provide RMR shallow subsidies to 40 elderly or disabled households. 5 Year: Provide shallow subsidies to a total of 200 elderly or disabled families through the Rebate for Marin Renters (RMR) Program.
2. **2008** - Provide Shelter Plus Care Vouchers and services to 90 formerly homeless individuals with severe psychiatric disabilities. Continue to provide supportive services to assist participants in maintaining their housing. 5 Year: Prevent homelessness by providing supportive services and rental assistance to a base total of 90 formerly homeless persons with severe psychiatric disabilities through the Shelter Plus Care program.
3. **2008** - Provide permanent affordable housing to 40 new Section 8 households. Issue a new Request for Proposals for project based Section 8 units. 5 Year: Prevent homelessness by providing permanent affordable housing to 200 new Section 8 households.
4. **2008** - Provide permanent affordable housing to 30 new Public Housing households. 5 Year: Prevent homelessness by providing permanent affordable housing to 150 new Public Housing households.
5. **2008** - Provide rental assistance to 30 individuals with HIV and AIDS in FY 2006. 5 Year: Provide rental assistance to 120 individuals with HIV and AIDS through HOPWA.

Subgoal 1.4: Promote Homeownership Opportunities

1. **2008** - Maintain current portfolio and add 10 new first-time homeowners through a combination of new construction and re-sales of existing BMR homes. Participate in one workshop for first-time homebuyers. 5 Year: Maintain and add to current portfolio of homes for low and moderate -income first-time homebuyers through the Below Market Rate (BMR) Homeownership Program. Add new properties as developments are planned and built

within each local jurisdiction; market and re-sell existing BMR units to eligible households when offered for re-sale; sell homes to 50 new first-time homebuyers during the five-year period. Clarify the role of the CDC with the County of Marin for tenant selection of Marin City BMR units.

2. **2008** - Enroll at least 1 participant in the Section 8 Homeownership Program. 5 Year: Provide Section 8 Homeownership Vouchers and assist up to 4 participants over the five year period.
3. **2008** - Obtain additional tax exempt bond allocations from CDLAC. Apply for new MCC's at an average of \$40,000 for \$600,000 in MCC tax credit authority and approximately \$3.0 million in first mortgage money. 5 Year: Obtain tax-exempt bond allocation from CDLAC for the Mortgage Credit Certificate Program sufficient to issue 10 MCC's to first-time homebuyers over the 5-year period.

Subgoal 1.5: Apply for additional rental vouchers if HUD announces a NOFA or other new programs

1. **2008**: Carefully review HUD's announcements for funding that is available for PHA's prepare and submit requests where appropriate. 5 Year: Review HUD's announcements for funding that is available for PHA's, prepare and submit requests where appropriate.

Subgoal 1.6: Increase Access to Housing Opportunities by Increasing Tenant Incomes

1. **2008** - Assist 50 public housing residents and 130 Section 8 participants to achieve contracted goals through FSS. 5 Year: Increase access to housing opportunities by assisting 25 public housing residents and 100 Section 8 participants each year to achieve their individual self-sufficiency goals.
2. **2008**- Increase the number of new participants with an escrow account by 10. 5 Year: Continue to increase the number of new persons by an average of 10 per year to a total of at least 50 new participants with escrow accounts.

PHA Goal 2: Enhance Services to Clients, Business Partners and the Community at Large through Delivery of Efficient and Responsive Programs

Subgoal 2.1: Demystify Services through Enhanced Communication

1. **2008** - Anticipate 2 briefings with a total of 20 clients oriented. 5 Year: Provide engaging and informative briefings to all new Section 8 Voucher holders.
2. **2008**- Apply for funding for the Senior Assist Line. Secure funds for this service. The information and referral line provides assistance to 2000 Senior and Disabled callers each year.
3. **2008** - Sponsor or participate in at least 10 open forums or meetings. 5 Year: Participate in open forums or meetings with Marin City public housing residents on issues of specific or general concern, including Maintenance and Operation meetings and Security meetings.
4. **2008** - Sponsor and/or participate in least 6 Mixed Population residents meetings at each Mixed Population complex. 5 Year: Sponsor and/or participate in 30 Mixed Population resident meetings at each Mixed Population Complexes to provide program and procedural updates.

Subgoal 2.2: Implement, Monitor and Improve Client Feedback Systems

1. **2008** - Solicit input from public housing residents through the RC, RAB or direct meetings as to what procedures or practices are confusing and/or burdensome. Prioritize areas of focus for streamlining. Hold one session in Marin City and one in Mixed Population complexes. Publish in the residents' newsletters various procedures and practices that are discussed with residents. 5 Year: Solicit input from residents as to what procedures or practices are perceived to be confusing and/or burdensome in order to assist in prioritizing areas that would most benefit from improved systems.

Subgoal 2.3: Concentrate on efforts to improve specific management functions.

1. **2008**: Review eligibility functions including initial application processing and annual re-certification functions. Review maintenance systems in order to improve service to the residents and reduce the turnaround time of vacant units. Evaluate the cost efficiency of contracting out maintenance services. 5 Year: Increase the efficiency of the management functions for both Public Housing and Section 8 Voucher Program.

Subgoal 2.4: Streamline External Procedures

1. **2008** - Continue to increase the availability of forms and information to MHA's landlords through the use of the website. 5 Year: Improve and simplify procedures and systems for interfacing with Section 8 landlords and utilize MHA's website to provide information to landlords, including downloadable forms. The MHA hotline provides landlords with a tool to advertise for tenants.
2. **2008** - Update the website to include the Agency Plan and the Administrative Plan. 5 Year: Update the website to include the Agency Plan, Administrative Plan, and the Occupancy Policy.
3. **2008** - Implement an automated phone attendant that will allow callers to reach desired staff quickly, as a backup to the receptionist and for after hour callers. 5 Year: Improve the quality of telephone response by answering incoming calls at the receptionist's desk quickly, returning all calls within 24 hours, providing clear and concise information.
4. **2008** - Place the interim reporting form on the web site in such a way that it will become interactive and the residents/participants can access the form from the web site. 5 Year: Implement an interactive web based systems.

PHA Goal 3: Continue to Build Collaborations with Other Agencies, Local Jurisdictions and the Private Sector

Objectives:

1. **2008**: Convene at least one meeting in FY 2008. Identify key resources and barriers to affordable housing opportunities and develop a strategy for engaging the participation of new landlords and retaining partnerships with existing landlords. 5 Year: Develop a formalized collaborative of stakeholders, including Section 8 landlords, other property managers, commercial realtors, housing non-profit providers, local governments, program participants and MHA.
2. **2008** - Continue collaboration with Sheriff's Department and other service agencies to monitor and reduce drug activity by having at least quarterly safety meetings in Marin City during the year. 5 Year: Sustain ongoing collaboration with the Marin County Sheriff, the Marin City Resident Council, the County Office of Drugs and Alcohol, BACR, Women

Helping All People (WHAP), Performing Stars, and the Marin City public housing residents to sustain the fight against drugs in Marin City.

3. **2008:** Continue active participation in the Continuum. Play a critical role in the development of the Homeless Management Information System to collect data on people who are homeless in Marin. Work with other providers and leaders to develop the plan to end chronic homelessness in 10 years. 5 Year: Continue participation and leadership in the Marin Continuum of Housing and Services and countywide efforts to end homelessness.

PHA Goal 4: Implement Asset Management for public housing.

1. **2008:** Implement asset management for public housing by dividing the funding and management of the public housing stock into two groups - Balance the budgets for both Mixed Population Housing and Marin City GGV. 5 Year: Monitor and modify asset management system cost effectively.

PHA Goal 5: Access additional resources for new affordable housing developments and for the rehabilitation/modernization of existing MHA housing stock.

1. **2008:** Begin the process of exploring new resources for the development of affordable housing and the rehabilitation and/or modernization of existing MHA housing stock. Create partnerships with for-profit developers and jurisdictions to create more affordable housing options for working people. 5 Year: To access new and innovated sources for development of affordable housing and ways to rehab and modernize existing housing stock.

PHA Goal 6: Continue to work with residents/participants to build community and self-sufficiency.

1. **2008:** Work with the GGV Resident Council to build community awareness and develop self sufficiency with the Public Housing Residents. Expand the availability of the Section 8 Voucher Self Sufficiency programs where possible. Offer service enriched programs where available and collaborates with other service agencies to access their services for our residents/participants. 5 Year: Ensure that funding remains consistent or increases for Family Self-sufficiency for both public housing and the Section 8 program. Seek new funding and program sources to assist residents/participants achieve self-sufficiency where possible.

PHA Goal 7: Explore ways to improve energy efficiency for public housing.

1. **2008:** Explore alternative sources of energy. Educate residents in conservation efforts. Review resident based utility payments and increase tenant participation in determining resident contributions toward utilities. 5 Year: Decrease the utility costs for public housing to insure sustainability of the public housing program under asset management.

PHA Goal 8: Conduct community meetings to present options to sustain GGV

1. **2008:** Conduct 2-3 community meetings to present opportunities for homeownership for residents. 5 Year: Develop a plan and complete implementation by the end of the five year plan.

Annual PHA Plan

PHA Fiscal Year 2008
[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.

MHA administers Section 8 and Public Housing programs as well as residential rehabilitation loan programs, various homeownership programs and several programs that provide supportive services to special needs groups. The Section 8 housing is located throughout the County and the Public Housing is located in six (6) complexes, of which one, Marin City, is a general occupancy complex and the others are for seniors/disabled.

As part of the Agency Plan process, MHA and its Board of Commissioners, with input from the Resident Advisory Board and GGV Resident Council have identified seven (8) key goals. Some of these broad goals consist of several practical sub-goals designed to help MHA meet its annual targets and the five (5) year objectives. The eight main goals are:

- 1) Maximize Affordable Housing Options in Marin County, and
- 2) Enhance Services to Clients, Business Partners and the Community at Large through Delivery of Efficient and Responsive Programs, and
- 3) Continue to Build Collaborations with other Agencies, Local Jurisdictions and the Private Sector, and
- 4) Implement Asset Management cost-effectively for public housing, and,
- 5) Access additional resources for new developments of affordable housing and for the rehabilitation/modernization of existing MHA housing stock, and
- 6) Continue to work with residents to build community and self-sufficiency, and
- 7) Explore ways to improve energy efficiency for public housing.
- 8) Conduct community meetings to present options to sustain GGV

The Agency Plan covers the following components:

1. Housing Needs
2. Financial Resources
3. Policies on Eligibility, Selection and Admissions
4. Rent Determination Policies
5. Agency Operations & Management
6. Grievance Procedures
7. Capital Improvement Needs
8. Demolition and Disposition
9. Public Housing Designation Listing
10. Conversion of Public Housing to Tenant-Based Assistance
11. Homeownership

12. Community Service & Family Self-Sufficiency Programs
13. Safety & Crime Prevention Measures
14. Pets
15. Audit
16. Asset Management Statement
17. Resident Advisory Board Comments
18. Required Certifications

The major challenges facing Marin County are:

- An inadequate supply of affordable housing stock, lack of adequate financial resources, and significant barriers to creating more affordable housing, and
- An aging rental stock, few ownership opportunities and
- Changing demographics and the needs of program participants that increasingly extend beyond the need for shelter.
- Changing demographics of race and ethnicity as well as a growing younger disabled community that is impacting the elderly community.

This Plan attempts to address these issues and MHA is dedicated to working in a collaborative structure with other agencies in the County to create solutions.

MHA has worked closely with the County of Marin in completing an accurate picture of the needs of the County, based on the County's Consolidated Plan and state regional housing needs requirements. In addition, MHA is an active member of the Marin Continuum of Housing and Services and is involved in many programs throughout the County including Community Mental Health, Marin County Health and Human Services Aging Division, 10-Year Homeless Planning process, Shelter Plus Care, HOPWA, Residential Rehabilitation Loan Program, Below Market Rate home sales, Rebates for Marin Renters, Rental Deposit Assistance, ROSS Program, Family Self-Sufficiency Programs for families and Mixed Population, YEMP, Marin County Health and Human Services, Workforce Incentive Board, and Mortgage Credit Certificates, and others.

Section 8 and public housing tenant selection, admissions and occupancy policies are reviewed on an annual basis and updated as needed. These policies are presented in the Agency Plan and are available at the offices of MHA and soon will be available on our website. Every update goes through a public process reviewed by the Resident Advisory Board and approved by HUD. Both the Section 8 Administrative Plan and the Public Housing Admissions and Continued Occupancy Policy are currently being reviewed and updated to include the Violence Against Women Act program, the LEP and updated section 504 policies.

As part of the Agency Plan review process, MHA appointed a Resident Advisory Board, including recipients of the Section 8 Program. The Resident Advisory Board will have no less than six (6) meetings to review and comment on components of the Agency Plan. The Advisory Board's comments are included in the final Plan. The comments of the Resident Advisory Board are located in the Attachments under the Section titled *Resident Advisory Board*.

Financial constraints, staffing limitations, and the challenge of new technology all continue to have an impact on choices MHA must make in order to fulfill its mission. MHA will need to prioritize improvements and maintenance to meet budgetary constraints. MHA has reduced staffing by 12 positions in 2006 and 2007 to adjust for revenue shortfalls. This has had an impact on the amount of workload that existing staffs can maintain. MHA will reduce public access on Wednesdays that fall after the first week of the month to maintain required paperwork. Maintenance will continue to be available 24-hours a day 7 days a week. The Capital Fund and other grant sources are important to MHA in order to maintain the necessary funding to carry out its mission to create a safe, sustainable, and livable environment for all tenants and residents.

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.

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| 18. Other Information | 81 |

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 |
| X | Consolidated Plan for the jurisdiction/s in which the PHA is 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 | Annual Plan: Housing Needs |
| X | Most recent board-approved operating budget for the public housing program | Annual Plan: Financial Resources |
| X | Public Housing Admissions and (Continued) Occupancy Policy (A&O), 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 | Annual Plan: Rent Determination |

| List of Supporting Documents Available for Review | | |
|--|---|---|
| Applicable & On Display | Supporting Document | Applicable Plan Component |
| | housing A & O Policy | |
| 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 |
| X | Public housing grievance procedures <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy | Annual Plan |
| 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 |
| N/A | Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant | N/A, no CIAP |
| X | 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 |
| N/A | 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 | N/A |
| N/A | Approved or submitted applications for demolition and/or disposition of public housing | Annual Plan: Demolition and Disposition |
| N/A | Approved or submitted applications for designation of public housing (Designated Housing Plans) | Annual Plan: Designation of Public Housing |
| N/A | 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: Voluntary Conversion of Public Housing |
| N/A | 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 |

| List of Supporting Documents Available for Review | | |
|--|--|---|
| Applicable & On Display | Supporting Document | Applicable Plan Component |
| 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 |
| X | The most recent Public Housing Drug Elimination Program (PHDEP) semi-annual performance report for any open grant and most recently submitted PHDEP application (PHDEP Plan) | Annual Plan: Safety and Crime Prevention PIC Submittal |
| 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 |
| N/A | Troubled PHAs: MOA/Recovery Plan | Troubled PHAs |
| X | Other supporting documents (optional) (list individually; use as many lines as necessary) | VAWA |

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.

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:
- 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: (list and indicate year of information)

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 | | | |
|---|--|---------------------|-----------------|
| Waiting list type: (select one) | | | |
| <input type="checkbox"/> | Section 8 tenant-based assistance | | |
| <input checked="" type="checkbox"/> | Public Housing (Public Housing Combined List; Mixed Population Complexes and Marin City GGV Family Complex) | | |
| <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/sub-jurisdiction: | | |
| | # of families | % of total families | Annual Turnover |
| Waiting list total | 679 | | 70 households |
| Extremely low income <=30% AMI | 602 | 88% | |
| Very low income (>30% but <=50% AMI) | 15 | 2% | |
| Low income (>50% but <80% AMI) | 3 | 0.4% | |
| Other singles | | | |
| Families | 619 | | |
| Elderly families | 60 | | |
| Families with Disabilities | | | |
| White | 387 | 56% | |
| Black | 148 | 21% | |
| Hispanic | 97 | 14% | |

| Housing Needs of Families on the Waiting List | | | |
|--|----|------|--|
| American Indian | 2 | 0.3% | |
| Asian/Pacific Is. | 24 | 3% | |
| Other | 21 | 32% | |
| Characteristics by Bedroom Size (Public Housing Only) | | | |
| 0 BR | | | |
| 1BR | | | |
| 2 BR | | | |
| 3 BR | | | |
| 4 BR | | | |
| 5 BR | | | |
| 5+ BR | 0 | | |

Is the waiting list closed (select one)? No Yes

If yes: How long has it been closed (# of months)? 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

The MHA allows families and individuals who have been displaced by natural disaster or government action onto the waiting list even if generally closed. In addition, the MHA allows households who are part of the federal Witness Protection program and those who are victims of hate crimes, even if they are not residents of the County. Marin Housing allows individuals and families who have a family member who require a wheelchair accessible unit to process a pre-application when the waiting list is otherwise closed. MHA will consider victims of domestic violence to be added to the waiting list if consistent with MHA's Violence Against Women Act program.

| | | | |
|--|---------------|---------------------|-----------------|
| 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 / sub jurisdiction: | | | |
| Draft Data: September 2001 | # of families | % of total families | Annual Turnover |
| Waiting list total | 490 | | -0- households |
| Extremely low income <=30% AMI | 396 | 80% | |
| Very low income (>30% but <=50% AMI) | 39 | 7% | |
| Low income (>50% but <80% AMI) | 11 | 2% | |
| Unknown | 44 | 8% | |
| Families with children | | | |
| Elderly & Disabled families | | | |
| White | 258 | 52% | |
| Black | 135 | 27% | |
| Hispanic | 54 | 11% | |
| American In. | 4 | .8% | |
| Asian/Pacific Is. | 33 | 6% | |
| Other | 6 | 1% | |
| The Section 8 Project Based Waiting List is not broken down by Bedroom Size per HUD regulations | | | |
| Characteristics by Bedroom Size (Public Housing Only) | | | |
| 0 BR | n/a | | |
| 1BR | n/a | | |
| 2 BR | n/a | | |
| 3 BR | n/a | | |
| 4 BR | n/a | | |
| 5 BR | n/a | | |
| 5+ BR | 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)? Since 6/13/02

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

- The MHA allows County residents who have been displaced by natural disaster or government action onto the waiting list even if generally closed. In addition, the MHA allows households who are part of the witness protection program, and those who are victims of hate crimes, or domestic violence consistent with the Violence Against Women Act program to apply, when the rest of the waiting list is closed.

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.

Please see Goals section for more specific annual implementation strategies for the MHA 5-Year Plan (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) **See Goals**

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

Select all that apply

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

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

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

Select all that apply

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

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

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

Select all that apply

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

Need: Specific Family Types: The Elderly

Strategy 1: Target available assistance to the elderly:

Select all that apply

- Seek designation of public housing for the elderly
- Apply for special-purpose vouchers targeted to the elderly, should they become available
- Other: (list below) ***Work with Area Agency on Aging to identify affordable housing opportunities***

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

Select all that apply

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

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)
Implement LEP

Strategy 2: Conduct activities to affirmatively further fair housing

Select all that apply

- Counsel Section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units

- Market the Section 8 program to owners outside of areas of poverty /minority concentrations
 - Other: (list below)
- Provide information from Legal Aid and Fair Housing of Marin to program participants when requested and with lease violation notices

Other Housing Needs & Strategies: (list needs and strategies below)
See Section on Goals

(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.

| 2008 Financial Resources: Planned Sources and Uses | | |
|---|----------------------------------|---|
| Sources | Planned \$ (estimate) | Planned Uses |
| 1. Federal Grants (FY 2007 grants) | | |
| a) Public Housing Operating Fund | 1,591,064 | |
| b) Public Housing Capital Fund | 945,000 | |
| c) HOPE VI Revitalization | 0 | |
| d) HOPE VI Demolition | 0 | |
| e) Annual Contributions for Section 8 Tenant-Based Assistance | 26,198,140 | |
| f) Public Housing Drug Elimination Program (including any Technical Assistance funds) | -0-* | |
| g) Resident Opportunity and Self- Sufficiency Grants | 1 | Ross- Family Ross- Elderly |
| h) Community Development Block Grant | 17,450 180,000 | Section 8 Housing Advocacy Residential Rehab Loans |
| i) HOME | -0- | |
| Other Federal Grants (list below) | | |

| 2008 Financial Resources: Planned Sources and Uses | | |
|---|--------------------------|------------------------------------|
| Sources | Planned \$ (estimate) | Planned Uses |
| j) Shelter Plus Care | 604000 | Rental Assistance for Mentally III |
| 2. Prior Year Federal Grants (unobligated funds only) (list below) | | |
| 3. Public Housing Dwelling Rental Income | 1,788922 | |
| 4. Other income (list below) | | |
| Interest and Investments | 50672 | |
| Excess Utilities | 60,000 | |
| 5. Non-federal sources (list below) | 814774 | |
| HOPWA | 20428 | |
| a) CA Dept of Mental Health | 671654 | |
| b) Division of Aging – Marin County | 24000 | |
| c) Laundry revenue | 21975 | |
| d) Maintenance charges | 76717 | |
| Total resources | 33176796 | |

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:

5—10, depending on bedroom size

When families are within a certain time of being offered a unit:

Other: (describe)

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

Criminal or Drug-related activity

Rental history

Housekeeping

Other (describe) Inspections to determine homeless status and/or declaration for a certified homeless shelter.

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) Four Project-Based Waiting lists were maintained by the new project sponsor but the practice ceased once the new units were occupied and potential tenants are screened and referred from MHA wait list for those units.

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

- PHA main administrative office
 PHA development site management office at the GGV in Marin City
 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? None

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?

A family can be on Section 8 and public housing waiting lists simultaneously.

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

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

(3) Assignment

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

- One
 Two
 Three or More

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

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

(4) Admissions Preferences

- a. Income targeting:

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

b. Transfer policies:

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

- Emergencies
 Overhoused
 Underhoused
 Medical justification
 Administrative reasons determined by the PHA (e.g., to permit modernization work)
 Resident choice: (state circumstances below)
 Other: (list below)
As part of the MHA's deconcentration plan

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))
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) (*MHA's Displacement Preference includes displacement by government action, and federal witness protection program only.*)
 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 accredited 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 accredited educational, training, or upward mobility programs *if graduated within the previous six months.*
 Victims of reprisals or hate crimes
 Other preference(s) In 2008 MHA will revise the Admissions and Occupancy policy and the Administrative Plan to add "Enlisted military and their families if serving in active duty in Iraq"

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.

MHA utilizes a Lottery System with points

Former Federal preferences

- 1 Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- 1 Victims of domestic violence
- 1 Homeless
- 1 Veteran

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans' families
- Residents who live and/or work in the jurisdiction
- Those enrolled currently in an accredited 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 an accredited educational, training, or upward mobility programs *if graduated within the previous six months.*
- Victims of reprisals or hate crimes
- Other preference(s) (list below) 2008 MHA will revise the Admissions and Occupancy policy and the Administrative Plan to add "Enlisted military and their families if serving in active duty in Iraq"

3. 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): *Social service agencies, Legal Aid of Marin, Mediation Services of Marin, and drug rehab centers are all trained to give some basic information on rules of occupancy*

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 (Also see Attachments)

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 - *MHA has only one family complex.*
- List (any applicable) developments below:

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.

(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)
- Previous eviction history from public housing or Section 8 program
- Sex Offender designation

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)

None

(2) Waiting List Organization

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

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

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

- PHA main administrative office
- Other (list below) *the project site office located at the Marin City GGv office.*

(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:

As a reasonable accommodation to a disabled family and in cases where the family was unable to search due to verifiable medical or family emergency.

(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 programs 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))

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) (*MHA's displacement preference includes displacement by government action, and the federal Witness Protection programs only.*)
- Victims of domestic violence
- Substandard housing
- Homeless
- 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 an accredited 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 an accredited educational, training, or upward mobility programs *who have graduated within the previous six months.*
- Victims of reprisals or hate crimes
- Other preference(s) (list below) 2008 MHA will revise the Admissions and Occupancy policy and the Administrative Plan to add "Enlisted military and their families if serving in active duty in Iraq"

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.

Lottery System:

Former Federal preferences

- 1 Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
- 1 Victims of domestic violence
- 1 Homeless
- 1 Veteran

Other preferences (select all that apply)

- Working families and those unable to work because of age or disability
- Veterans and veterans' families
- Residents who work in your jurisdiction
- Those enrolled currently in an accredited 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 an accredited educational, training, or upward mobility *programs if they graduated within the previous six months.*
- Victims of reprisals or hate crimes
- Other preference(s) (list below)
Homeless,
In 2008, MHA will revise the Admissions and Occupancy policy and the Administrative Plan to add "Enlisted military and their families if serving in active duty in Iraq"

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

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

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

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

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

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

(5) Special Purpose Section 8 Assistance Programs

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

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

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

- Through published notices
- Other (list below)
Send letters and/or flyers to a comprehensive list of social service agencies

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

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

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 for previously unemployed household members or participants in the family Self-sufficiency programs.
- 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 head of household with increases in earned income for previously unemployed household members or participants in the family Self-sufficiency programs.
- For other family members with increases in earned income for previously unemployed household members or participants in the family Self-sufficiency programs.
- 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 – Ceiling Rents no longer applicable – See Flat Rents

2. For which kinds of developments are ceiling rents in place? (Select all that apply) Not applicable

- 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)

- Not applicable*
- 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 composition changes or experiences an income increase
- Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold)
- Other (list below)

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

(2) Flat Rents

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

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

B. Section 8 Tenant-Based Assistance

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

(1) Payment Standards

Describe the voucher payment standards and policies.

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

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

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

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

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

- FMRs are not adequate to ensure success among assisted families in the PHA's segment of the FMR area
- Reflects market or submarket
- To increase housing options for families
- Other (list below)

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

- Annually
- Other (list below)

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

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

(2) Minimum Rent

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

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

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

MHA uses the federally required hardship exemptions

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)

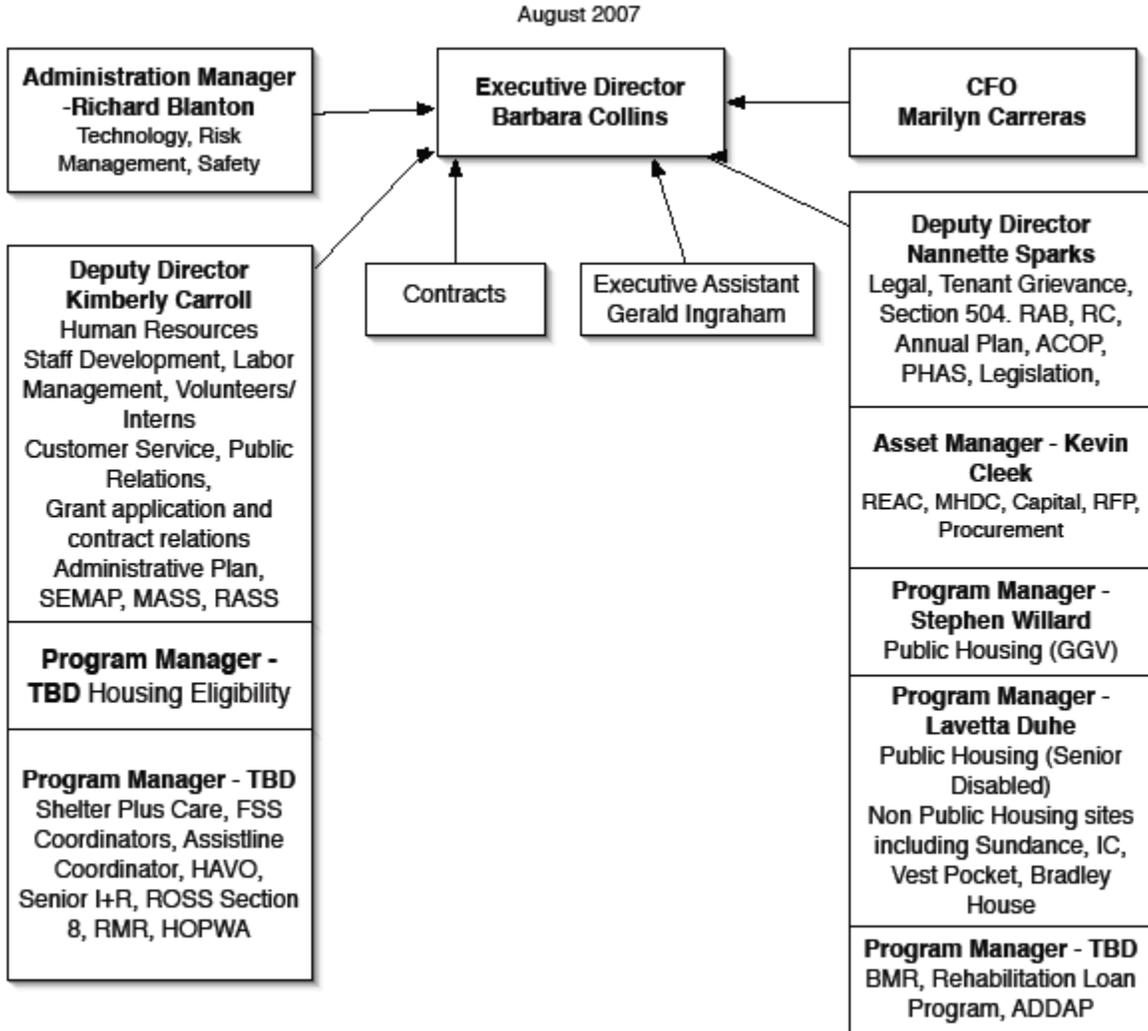
A. PHA Management Structure

Describe the PHA's management structure and organization.

(Select one)

An organization chart showing the PHA's management structure and organization is attached.

Marin Housing Organizational Chart



A brief description of the management structure and organization of the PHA follows:

B. HUD Programs Under PHA Management

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 | Expected Turnover |
|---|--|-------------------|
| Public Housing | 496 | 72 |
| Section 8 Vouchers | 2109 | 110 |
| Section 8 Certificates | N/A | N/A |
| Section 8 Mod Rehab | N/A | |
| Special Purpose Section 8 Certificates/Vouchers (list individually) | Shelter Plus Care - 115 Housing for Person Living with HIV - 45 | 5 8 |
| Public Housing Drug Elimination Program (PHDEP) | Terminated 3/31/03 | |
| Other Federal Programs (list individually) | R.O.S.S. – 130 | Rotating Clients |
| CDBG | Section 8 Advocacy - 360 | N/A |

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)
 - Admissions and Continued Occupancy Policy, including Rent Collection Policy
 - Personnel Policy
 - Procurement Policy
 - Asset Disposition
 - Schedule of Maintenance Charges
 - Maintenance Operations Manual, including Prevention and Eradication of Pest Infestation
 - Confidentiality Policy
 - Conflict of Interest Policy
 - Injury and Illness Prevention Program
 - Risk Management Prevention & Remediation
 - Emergency Action Plan
 - Section 504
 - FSS Program Guidelines

- (2) Section 8 Management: (list below)
 - Administrative Plan
 - Personnel Policy
 - Procurement Policy
 - Asset Disposition
 - Injury and Illness Prevention Program
 - Emergency Action Plan
 - Confidentiality Policy

Conflict of Interest Policy
Shelter + Care Policy Manual
HOPWA Policy Manual
RDGP Policy
RMR Policy
FSS Program Guidelines
Section 504

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:

MHA has an informal conference with an impartial mediator and if that fails to resolve the issue there is a formal hearing before a three member hearing panel. Our grievance procedure is located in the Occupancy Policy.

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)
Public Housing Office at GGV in Marin City

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:

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)
Public Housing Office at GGV in Marin City

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.

**PHA Plan
Table Library**

**Component 7
Capital Fund Program Annual Statement**

Parts I, II, and III

Annual Statement

Capital Fund Program (CFP) Part I: Summary

Capital Fund Grant Number
CA 39P05250108

FFY of Grant Approval: 2008

Original Annual Statement

| Line No. | Summary by Development Account | Total Estimated Cost |
|----------|---|----------------------|
| 1. | Total Non-CGP Funds | |
| 2. | 1406 Operations | |
| 3. | 1408 Management Improvements | \$ 44,000 |
| 4. | 1410 Administration | \$ 70,829 |
| 5. | 1411 Audit | |
| 6. | 1415 Liquidated Damages | |
| 7. | 1430 Fees and Costs | |
| 8. | 1440 Site Acquisition | |
| 9. | 1450 Site Improvement | \$ 46,000 |
| 10. | 1460 Dwelling Structures | \$547,466 |
| 11. | 1465.1 Dwelling Equipment-Nonexpendable | |
| 12. | 1470 Non-dwelling Structures | |
| 13. | 1475 Non-dwelling Equipment | |
| 14. | 1485 Demolition | |
| 15. | 1490 Replacement Reserve | |
| 16. | 1492 Moving to Work Demonstration | |
| 17. | 1495.1 Relocation Costs | |
| 18. | 1498 Mod Used for Development | |
| 19. | 1502 Contingency | |
| 20. | Amount of Annual Grant (Sum of lines 2-19) | \$ 708,295 |
| 21. | Amount of line 20 Related to LBP Activities | |
| 22. | Amount of line 20 Related to Section 504 Compliance | \$ 15,000 |
| 23. | Amount of line 20 Related to Security | |
| 24. | Amount of line 20 Related to Energy Conservation Measures | \$ 194,000 |

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 |
|--|---|---|----------------------------|
| CA39P052001 Golden Gate Village | Repairs to Landscaping & Irrigation System | 1450 | 16,000 |
| | Repair Broken Concrete Sidewalks & Stairs | 1450 | 10,000 |
| | Interior/Exterior Painting Labor | 1450 | 164,000 |
| | Replace Kitchen Cabinets in Low-Rise Apts. | 1460 | 74,080 |
| | Replace High-Rise Building Water Heaters | 1460 | 32,000 |
| | Replace Low-Rise Furnaces (10/year) | 1460 | 25,000 |
| | Replace Low-Rise Water Heaters (20/year) | 1460 | 8,000 |
| | Replace Stoves (50/year) | 1460 | 15,000 |
| | Replace Refrigerators (30/year) | 1460 | 12,000 |
| | Elderly/Disabled Developments | Repairs to Landscaping & Irrigation Systems | 1450 |
| Repair Broken Concrete Sidewalks & Stairs | | 1450 | 5,000 |
| Interior/Exterior Painting Labor | | 1460 | 24,000 |
| Interior Improvements/Appliance Replacement | | 1460 | 20,000 |
| Replace Siding (Partial) | | 1460 | 73,386 |
| CA39PO52006 Golden Hinde | Replace Sliding Glass Doors/Windows (Partial) | 1460 | 100,000 |
| CA39PO52007 Kruger Pines | Procurement Coordinator | 1408 | 44,000 |
| PHA Wide 052 Agency Wide | Contract Administrator | 1410.2 | 70,829 |
| | | | |

**Annual Statement
Capital Fund Program (CFP) Part III: Implementation Schedule**

| Development Number/Name HA-Wide Activities | All Funds Obligated | All Funds Expended |
|--|---------------------|--------------------|
| CA39PO52001 Golden Gate Village | 8/01/10 | 8/01/12 |
| CA39PO52006 Golden Hinde | 8/01/10 | 8/01/12 |
| CA39PO52007 Kruger Pines | 8/01/10 | 8/01/12 |
| PHA Wide 052 Agency Wide | 8/01/10 | 8/01/12 |

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**Annual Statement
Capital Fund Program (CFP)
Summary**

Part I:

| | | |
|--|--|--|
| PHA Name: Housing Authority of the County of Marin | Grant Type and Number Capital Fund Program Grant No: <u>CA39P05250105</u> | Federal FY of Grant: <u>2005</u> |
|--|--|--|

Revision No. 4

Original Annual Statement Reserve for Disasters/ Emergencies Revised Annual Statement No. 4

Performance and Evaluation Report for Period Ending: 06/30/07 Final Performance and Evaluation Report

| Line No. | Summary by Development Account | Total Estimated Cost | | Total Actual Cost | |
|----------|---|----------------------|--------------|-------------------|------------|
| | | Original | Revised | Obligated | Expended |
| 1 | Total non-CFP Funds | | | | |
| 2 | 1406 Operations | | | | |
| 3 | 1408 Management Improvements Soft Costs | \$ 103,562 | \$ 109,188 | \$ 109,188 | \$ 106,727 |
| 4 | 1410 Administration | \$ 105,161 | \$ 105,161 | \$ 105,161 | \$ 105,161 |
| 5 | 1411 Audit | | | | |
| 6 | 1415 Liquidated Damages | | | | |
| 7 | 1430 Fees and Costs | \$ 20,088 | \$ 18,330 | \$ 18,330 | \$ 12,058 |
| 8 | 1440 Site Acquisition | | | | |
| 9 | 1450 Site Improvement | \$ 192,490 | \$ 192,877 | \$ 192,877 | \$ 192,877 |
| 10 | 1460 Dwelling Structures | \$ 743,860 | \$ 739,605 | \$ 635,835 | \$ 505,497 |
| 11 | 1465.1 Dwelling Equipment-Nonexpendable | | | | |
| 12 | 1470 Nondwelling Structures | | | | |
| 13 | 1475 Nondwelling Equipment | \$ 0 | \$ 0 | \$ 0 | \$ 0 |
| 14 | 1485 Demolition | | | | |
| 15 | 1490 Replacement Reserve | | | | |
| 16 | 1492 Moving to Work Demonstration | | | | |
| 17 | 1495.1 Relocation Costs | \$ 0 | \$ 0 | \$ 0 | \$ 0 |
| 18 | 1499 Development Activities | | | | |
| 19 | 1501 Collateralization or Debt Service | | | | |
| 20 | 1502 Contingency | | | | |
| 21 | Amount of Annual Grant: (sum of lines 1-19) | \$ 1,165,161 | \$ 1,165,161 | \$ 1,061,391 | \$ 922,319 |
| 22 | Amount of line 21 Related to LBP Activities | 0 | 0 | 0 | 0 |
| 23 | Amount of line 21 Related to Section 504 | \$ 57,350 | \$ 57,350 | \$ 44,160 | \$ 41,699 |

**Annual Statement
Capital Fund Program (CFP)
Summary**

Part I:

| | | |
|--|--|--|
| PHA Name: Housing Authority of the County of Marin | Grant Type and Number Capital Fund Program Grant No: <u>CA39P05250105</u> Revision No. 4 | Federal FY of Grant: <u>2005</u> |
|--|--|--|

Original Annual Statement Reserve for Disasters/ Emergencies Revised Annual Statement No. 4
 Performance and Evaluation Report for Period Ending: 06/30/07 Final Performance and Evaluation Report

| Line No. | Summary by Development Account | Total Estimated Cost | | Total Actual Cost | |
|----------|---|----------------------|-----------|-------------------|-----------|
| | compliance | | | | |
| 24 | Amount of line 21 Related to Security –Soft Costs | 0 | 0 | 0 | 0 |
| 25 | Amount of line 21 related to Security-- Hard Costs | 0 | 0 | 0 | 0 |
| 26 | Amount of line 21 Related to Energy Conservation Measures | \$ 57,350 | \$ 58,700 | \$ 11,900 | \$ 11,900 |

Signature of the Executive Director:

Signature of Public Housing Director:

Barbara Collins

July 24, 2007

Stephen Schneller

Date: _____

Annual Statement
Capital Fund Program (CFP)

Part II: Supporting

Pages

| PHA Name: Housing Authority of the County of Marin | | Grant Type and Number Capital Fund Program Grant No: CA39P05250105 | | | | Federal FY of Grant: <u>2005</u> | | |
|--|--|---|--------------|----------------------|------------|--|------------|---|
| Development Number Name/HA-Wide Activities | General Description of Major Work Categories | Dev. Acct No. | Quantit y | Total Estimated Cost | | Total Actual Cost | | Status of Work |
| | | | | Original | Revised | Obligated | Expended | |
| CA39P052001 Marin City | General Site Labor | 1450 | | \$ 66,578 | \$ 66,578 | \$ 66,578 | \$ 66,578 | Completed 12/31/06 |
| | Repair Broken Water Distribution System Lines in Ground | 1450 | | \$ 0 | \$ 0 | \$ 0 | \$ 0 | Funds Moved to Courtyard Tables (Below) |
| | Repair Deteriorated Tables & Seats in 300 Drake Courtyard | 1450 | | \$ 6,912 | \$ 6,912 | \$ 6,912 | \$ 6,912 | Completed 12/20/06: A.E. Nelson |
| | Repair Broken Concrete Sidewalks & Stairs | 1450 | | \$ 88,000 | \$ 87,894 | \$ 87,894 | \$ 87,894 | Completed 01/31/07: Whiteside Concrete Construction |
| | Repairs to Landscaping & Irrigation System | 1450 | | \$ 0 | \$ 0 | \$ 0 | \$ 0 | Funds Moved to Sidewalk Repairs above |
| | Interior/Exterior Painting Labor | 1460 | | \$ 98,923 | \$ 203,657 | \$ 203,657 | \$ 126,133 | Work Underway Thru 12/31/07; Funds Moved from CFP 501-06 |
| | Replace Kitchen Cabinets in Low- Rise Apartments (Partial) | 1460 | | \$ 68 | \$ 68 | \$ 68 | \$ 68 | Work Moved to CFP 501-04 |
| CA39P052001 Marin City | Emergency Repair of Some High- Rise Boilers & Hot Water Heaters | 1460 | | \$ 31,546 | \$ 27,487 | \$ 27,487 | \$ 27,487 | Boiler & Water Heater Work Completed: |

Annual Statement

Capital Fund Program (CFP)

Part II: Supporting

Pages

| PHA Name: Housing Authority of the County of Marin | | Grant Type and Number Capital Fund Program Grant No: CA39P05250105 | | | | Revision No. 4 | | | Federal FY of Grant: <u>2005</u> |
|--|---|---|--------------|----------------------|-----------|-------------------|-----------|---|--|
| Development Number Name/HA-Wide Activities | General Description of Major Work Categories | Dev. Acct No. | Quantit y | Total Estimated Cost | | Total Actual Cost | | Status of Work | |
| | | | | Original | Revised | Obligated | Expended | | |
| (Continued) | | | | | | | | Demakas & Cornely | |
| | General Dwelling Unit Labor | 1460 | | \$ 60,996 | \$ 60,996 | \$ 60,996 | \$ 60,996 | Completed 12/31/06 | |
| | Emergency Roofing Repairs | 1460 | | \$ 2,018 | \$ 2,018 | \$ 2,018 | \$ 2,018 | Completed: 2 nd Generation Roofing | |
| | Temporary Relocation- Food Allowances during Kitchen Remodels | 1495.1 | | \$ 0 | \$ 0 | \$ 0 | \$ 0 | Funds Moved to CFP 501-06 | |
| CA39PO52002 Venetia Oaks | Partial Funding to Complete Building Repairs | 1460 | 2 Bldg. | \$ 2,387 | \$ 15,751 | \$ 15,751 | \$ 0 | Work Underway by IMR Roofing | |
| | Termite Treatment & Repairs | 1460 | | \$ 5,000 | \$ 5,000 | \$ 0 | \$ 0 | Planning Underway | |
| | Install Insulation In Walls of Vacant Apartments | 1460 | | \$ 6,722 | \$ 6,527 | \$ 0 | \$ 0 | Planning Underway | |
| CA39PO52003 Homestead Terrace | Install Insulation In Walls of Vacant Apartments | 1460 | 5 Bldg. | \$ 4,005 | \$ 4,005 | \$ 0 | \$ 0 | Planning Underway | |
| CA39PO52003 Homestead Terrace | Partial Funding to Complete Building Repairs (siding repairs, painting, fencing, gutters, & community | 1460 | 5 Bldg. | \$ 303,000 | \$ 73,698 | \$ 11,959 | \$ 7,688 | Bids Rejected as Too High: Mailboxes | |

Annual Statement

Capital Fund Program (CFP)

Part II: Supporting

Pages

| PHA Name: Housing Authority of the County of Marin | | Grant Type and Number Capital Fund Program Grant No: CA39P05250105 | | | | Federal FY of Grant: <u>2005</u> | | |
|--|---|---|--------------|----------------------|------------|--|------------|---|
| Development Number Name/HA-Wide Activities | General Description of Major Work Categories | Dev. Acct No. | Quantit y | Total Estimated Cost | | Total Actual Cost | | Status of Work |
| | | | | Original | Revised | Obligated | Expended | |
| | building) | | | | | | | Received; Address Lights Installed; Remainder of Funds Moved to CFP 501-06 |
| CA39PO52004 Casa Nova | Replace Site Lighting | 1450 | | \$ 0 | \$ 0 | \$ 0 | \$ 0 | Work Moved to CFP 501-06 |
| | Termite Treatment & Repairs | 1460 | | \$ 15,000 | \$ 15,000 | \$ 5,390 | \$ 5,390 | Work Underway |
| | Purchase & Install Four New Mail Parcel Lockers | 1460 | | \$ 2,000 | \$ 2,000 | \$ 1,083 | \$ 1,074 | Parcel Lockers Received |
| CA39PO52006 Golden Hinde | Repairs to Site Lighting | 1450 | | \$ 0 | \$ 0 | \$ 0 | \$ 0 | Work Moved to CFP 501-06 |
| | Termite Treatment & Repairs | 1460 | | \$ 14,527 | \$ 14,527 | \$ 0 | \$ 0 | Planning Underway |
| | Installation of New Doors on Water Heater Cabinets | 1460 | | \$ 16,819 | \$ 16,819 | \$ 16,819 | \$ 16,819 | Installation of Doors Completed 9/30/06: A.E. Nelson |
| CA39PO52006 Golden Hinde (Continued) | Replace Roofing at Flat Areas on 7 Buildings & Sloped Roofing on All 13 Buildings | 1460 | 13 Bldgs. | \$ 0 | \$ 180,000 | \$ 180,000 | \$ 157,950 | Roofing Completed 6/30/07: IMR Roofing |

Annual Statement

Capital Fund Program (CFP)

Part II: Supporting

Pages

| PHA Name: Housing Authority of the County of Marin | | Grant Type and Number Capital Fund Program Grant No: CA39P05250105 | | | | Federal FY of Grant: <u>2005</u> | | |
|--|---|---|--------------|----------------------|------------|--|------------|--|
| Development Number Name/HA-Wide Activities | General Description of Major Work Categories | Dev. Acct No. | Quantit y | Total Estimated Cost | | Total Actual Cost | | Status of Work |
| | | | | Original | Revised | Obligated | Expended | |
| | | | | | | | | |
| CA39PO52007 Kruger Pines | Replace Carpeting in Hallways | 1460 | | \$ 16,654 | \$ 16,654 | \$ 16,654 | \$ 16,654 | Completed: Criterion Flooring |
| | Repair Leaks in Fire sprinkler System | 1460 | | \$ 0 | \$ 0 | \$ 0 | \$ 0 | Work Moved to CFP 501-06 |
| | Repair/Replace Sliding Glass Doors | 1460 | | \$ 79,500 | \$ 0 | \$ 0 | \$ 0 | Work Moved to CFP 501-06 |
| | Purchase & Install New "4C" Mailboxes & Parcel Lockers | 1460 | | \$ 5,398 | \$ 5,398 | \$ 3,953 | \$ 3,924 | Mailboxes & Parcel Lockers Received |
| PHA Wide 052 Agency Wide | Procurement Coordinator | 1408 | | \$ 31,450 | \$ 31,450 | \$ 31,450 | \$ 31,450 | Completed 12/31/06 |
| | Facilities & Services Manager | 1408 | | \$ 61,065 | \$ 61,065 | \$ 61,065 | \$ 61,065 | Completed 12/31/06 |
| | PHA-Wide Energy Audit & Utility Allowances for Golden Gate Village | 1408 | | \$ 11,047 | \$ 16,673 | \$ 16,673 | \$ 14,212 | Energy Audit; Allowance Studies; & Presentation Completed: The Nelrod Co. |
| PHA Wide 052 Agency Wide | Contract Administrator | 1410.2 | | \$ 105,161 | \$ 105,161 | \$ 105,161 | \$ 105,161 | Completed 11/30/06 |
| | Architectural & Engineering Fees for Repairs at Home-stead Terrace | 1430 | | \$ 20,088 | \$ 18,330 | \$ 18,330 | \$ 12,058 | Portion of Contract with H&Y Architects |

Annual Statement

Capital Fund Program (CFP)

Part II: Supporting

Pages

| PHA Name: Housing Authority of the County of Marin | | Grant Type and Number Capital Fund Program Grant No: CA39P05250105 | | | | Revision No. 4 | | | Federal FY of Grant: <u>2005</u> |
|--|--|---|--------------|----------------------|-----------|-------------------|-----------|--|--|
| Development Number Name/HA-Wide Activities | General Description of Major Work Categories | Dev. Acct No. | Quantit y | Total Estimated Cost | | Total Actual Cost | | Status of Work | |
| | | | | Original | Revised | Obligated | Expended | | |
| | (Partial) | | | | | | | | |
| | General Site Labor | 1450 | | \$ 0 | \$ 0 | \$ 0 | \$ 0 | Funds moved to similar work at GGv | |
| | Repairs to Landscaping & Irrigation System at Elderly/Disabled Complexes | 1450 | | \$ 0 | \$ 0 | \$ 0 | \$ 0 | Funds Moved to CFP 501-06 | |
| | Repair Broken Concrete Sidewalks & Stairs at Elderly/Disabled Complexes | 1450 | | \$ 31,000 | \$ 31,492 | \$ 31,492 | \$ 31,492 | Completed 02/16/07: Whiteside Concrete Construction | |
| | Interior/Exterior Painting Labor at Elderly/Disabled Complexes | 1460 | | \$ 79,296 | \$ 90,000 | \$ 90,000 | \$ 79,296 | Work Underway Thru 12/31/07; Funds Moved from CFP 501-06 | |
| PHA Wide 052 Agency Wide | Accessibility Improvements at 4020 Civic Center Offices | 1475 | | \$ 0 | \$ 0 | \$ 0 | \$ 0 | HUD deter-mined that Capital Funds cannot be used for non-ACC property. Funds/Work Deleted | |

Annual Statement
Capital Fund Program (CFP)

Part III: Implementation

Schedule

| | | | | | | | | |
|--|--------------------|--|------------------|--------------------|---------|--------|---|--|
| PHA Name: Housing Authority of the County of Marin | | Grant Type and Number Capital Fund Program No: <u>CA39P05250105</u> | | | | | Federal FY of Grant: <u>2005</u> | |
| | | Revision No. 4 | | | | | | |
| Development Number Name/HA-Wide Activities | All Fund Obligated | | | All Funds Expended | | | Reasons for Revised Target Dates | |
| | Original | Revised | Actual | Original | Revised | Actual | | |
| CA39P052001 Marin City | 08/18/07 | | 5/31/07** | 08/18/08 | | | Obligation & Expenditure "Start Date" will be <u>August 18, 2005.</u> | |
| CA39P052002 Venetia Oaks | 08/18/07 | | 5/31/07* | 08/18/08 | | | ACC to be executed by HUD on 8/18/2005. Obligation Deadline for FFY 2005 Grant | |
| CA39P052003 Homestead Terrace | 08/18/07 | | 5/31/07* | 08/18/08 | | | is Two Years (or <u>August 18, 2007</u>). Expenditure Deadline for FFY 2005 | |
| CA39P052004 Casa Nova | 08/18/07 | | 5/31/07* | 08/18/08 | | | Grant is Three Years (or August 18, 2008). | |
| CA39P052006 Golden Hinde | 08/18/07 | | 5/31/07** | 08/18/08 | | | | |
| CA39P052007 Kruger Pines | 08/18/07 | | 5/31/07* | 08/18/08 | | | | |
| PHA Wide 052 Agency Wide | 08/18/07 | | 5/31/07** | 08/18/08 | | | | |

* **90% of Funds Obligated**

** **100% of Funds Obligated**

Annual Statement

Capital Fund Program (CFP)

Summary

Part I:

| | | |
|--|--|--|
| PHA Name: Housing Authority of the County of Marin | Grant Type and Number Capital Fund Program Grant No: <u>CA39P05250106</u> | Federal FY of Grant: <u>2006</u> |
| Revision No. 3 | | |

Original Annual Statement Reserve for Disasters/ Emergencies Revised Annual Statement Revision No. 3

Performance and Evaluation Report for Period Ending: 06/30/07 Final Performance and Evaluation Report

| Line No. | Summary by Development Account | Total Estimated Cost | | Total Actual Cost | |
|----------|--|----------------------|------------|-------------------|------------|
| | | Original | Revised | Obligated | Expended |
| 1 | Total non-CFP Funds | | | | |
| 2 | 1406 Operations | | | | |
| 3 | 1408 Management Improvements--Soft Costs | \$ 99,585 | \$ 121,211 | \$ 121,211 | \$ 67,173 |
| 4 | 1410 Administration | \$ 103,000 | \$ 103,000 | \$ 89,900 | \$ 47,350 |
| 5 | 1411 Audit | | | | |
| 6 | 1415 Liquidated Damages | | | | |
| 7 | 1430 Fees and Costs | \$ 18,306 | \$ 11,680 | \$ 0 | \$ 0 |
| 8 | 1440 Site Acquisition | | | | |
| 9 | 1450 Site Improvement | \$ 73,183 | \$ 71,183 | \$ 6,981 | \$ 6,981 |
| 10 | 1460 Dwelling Structures | \$ 697,043 | \$ 699,043 | \$ 127,498 | \$ 125,136 |
| 11 | 1465.1 Dwelling Equipment-Nonexpendable | | | | |
| 12 | 1470 Nondwelling Structures | | | | |
| 13 | 1475 Nondwelling Equipment | \$ 60,000 | \$ 45,000 | \$ 45,000 | \$ 44,095 |
| 14 | 1485 Demolition | | | | |
| 15 | 1490 Replacement Reserve | | | | |
| 16 | 1492 Moving to Work Demonstration | | | | |
| 17 | 1495.1 Relocation Costs | \$ 10,000 | \$ 10,000 | \$ 0 | \$ 0 |
| 18 | 1499 Development Activities | | | | |
| 19 | 1501 Collaterization or Debt Service | | | | |

Annual Statement

Capital Fund Program (CFP)

Summary

Part I:

| | | |
|--|--|--|
| PHA Name: Housing Authority of the County of Marin | Grant Type and Number Capital Fund Program Grant No: <u>CA39P05250106</u> Revision No. 3 | Federal FY of Grant: <u>2006</u> |
|--|--|--|

Original Annual Statement Reserve for Disasters/ Emergencies Revised Annual Statement Revision No. 3
 Performance and Evaluation Report for Period Ending: 06/30/07 Final Performance and Evaluation Report

| Line No. | Summary by Development Account | Total Estimated Cost | | Total Actual Cost | |
|----------|---|----------------------|--------------|-------------------|------------|
| 20 | 1502 Contingency | | | | |
| 21 | Amount of Annual Grant: (sum of lines 1-19) | \$ 1,061,117 | \$ 1,061,117 | \$ 390,590 | \$ 290,734 |
| 22 | Amount of line 21 Related to LBP Activities | \$ 0 | \$ 0 | \$ 0 | \$ 0 |
| 23 | Amount of line 21 Related to Section 504 compliance | \$ 29,517 | \$ 22,167 | \$ 0 | \$ 0 |
| 24 | Amount of line 21 Related to Security –Soft Costs | \$ 0 | \$ 0 | \$ 0 | \$ 0 |
| 25 | Amount of line 21 related to Security-- Hard Costs | \$ 0 | \$ 0 | \$ 0 | \$ 0 |
| 26 | Amount of line 21 Related to Energy Conservation Measures | \$ 55,450 | \$ 64,014 | \$ 0 | \$ 0 |

Signature of the Executive Director:

Barbara Collins

October 16, 2007

Signature of Public Housing Director:

Stephen Schneller

Date: _____

Annual Statement
Capital Fund Program (CFP)

Part II: Supporting

Pages

| PHA Name: Housing Authority of the County of Marin | | Grant Type and Number Capital Fund Program Grant No: CA39P05250106 | | | | Federal FY of Grant: 2006 | | | |
|--|---|---|----------|----------------------|------------|-------------------------------------|-----------|--|--|
| | | Revision No. 3 | | | | | | | |
| Development Number Name/HA-Wide Activities | General Description of Major Work Categories | Dev. Acct No. | Quantity | Total Estimated Cost | | Total Actual Cost | | Status of Work | |
| | | | | Original | Revised | Obligated | Expended | | |
| CA39P052001 Golden Gate Village | Youth Employment Training Program for GGV Residents | 1408 | | \$ 36,085 | \$ 36,085 | \$ 36,085 | \$ 16,905 | Underway under Contract with GGV Resident Council | |
| | Repairs to Landscaping & Irrigation System | 1450 | | \$ 20,000 | \$ 20,000 | \$ 0 | \$ 0 | Planning Underway | |
| | REAC Improvements | 1450 | | \$ 28,765 | \$ 6,981 | \$ 6,981 | \$ 6,981 | Completed: Added bark to play lots | |
| | Repair Low-rise Patios Gates | 1450 | | \$ 0 | \$ 19,784 | \$ 0 | \$ 0 | Funds Moved from REAC Imp. | |
| | Interior/Exterior Painting Improvements | 1460 | | \$ 90,000 | \$ 46,360 | \$ 46,360 | \$ 46,360 | Completed: Remainder of work in 2007 moved to CFP 501-05 | |
| | Replace Kitchen Cabinets in Low- Rise Apartments (Partial) | 1460 | | \$ 138,915 | \$ 138,915 | \$ 25,000 | \$ 22,638 | Completed Final Touchup on 1 st 35 Units; Planning Underway for More | |
| | General Dwelling Unit Labor | 1460 | | \$ 8,921 | \$ 8,921 | \$ 8,921 | \$ 8,921 | Completed (Marty Coman): Moved \$2,650 from GGV | |

Annual Statement

Capital Fund Program (CFP)

Part II: Supporting

Pages

| PHA Name: Housing Authority of the County of Marin | | Grant Type and Number Capital Fund Program Grant No: CA39P05250106 | | | | Revision No. 3 | | | Federal FY of Grant: <u>2006</u> |
|--|---|---|----------|----------------------|-----------|-------------------|-----------|---|--|
| Development Number Name/HA-Wide Activities | General Description of Major Work Categories | Dev. Acct No. | Quantity | Total Estimated Cost | | Total Actual Cost | | Status of Work | |
| | | | | Original | Revised | Obligated | Expended | | |
| | | | | | | | | Accessibility Improvements | |
| CA39P052001 Golden Gate Village (Continued) | Energy Conservation Improvements | 1460 | | \$ 18,270 | \$ 26,834 | \$ 0 | \$ 0 | 60% of the \$30,450 Funds Added by HUD on 4/16/07 + Moved \$7,350 from Access. Imp. below | |
| | Accessibility Improvements | 1460 | | \$ 7,350 | \$ 0 | \$ 0 | \$ 0 | Moved \$2,650 to General Dwelling Unit Labor & \$7350 to Energy Conserv. | |
| | Completion of Stair Tower, Guardrail, & Laundry Renovation at 89 & 99 Cole and 409 & 419 Drake High-Rise Buildings | 1460 | | \$ 35,229 | \$ 34,015 | \$ 34,015 | \$ 34,015 | Completed: A.E. Nelson Contract | |
| | Emergency Roofing Repairs at Low- Rise One Story Buildings | 1460 | 5 Bldgs. | \$ 0 | \$ 2,000 | \$ 0 | \$ 0 | Funds Moved from REAC Imp. | |
| | Purchase New Dump Truck for GGV Maintenance | 1475.7 | | \$ 60,000 | \$ 45,000 | \$ 45,000 | \$ 44,095 | Purchase Completed | |
| | Temporary Relocation Allowances during GGV Kitchen Remodels | 1495.1 | | \$ 10,000 | \$ 10,000 | \$ 0 | \$ 0 | Planning Underway | |
| CA39PO52002 Venetia Oaks | <u>Partial</u> Funding to Complete Building Roofing Repairs | 1460 | 2 Bldg. | \$ 2,613 | \$ 0 | \$ 0 | \$ 0 | Moved All VO Roofing to CFP 501-05 | |

Annual Statement

Capital Fund Program (CFP)

Part II: Supporting

Pages

| PHA Name: Housing Authority of the County of Marin | | Grant Type and Number Capital Fund Program Grant No: <u>CA39P05250106</u> | | | | Revision No. 3 | | | | Federal FY of Grant: <u>2006</u> |
|--|--|--|----------|----------------------|------------|-------------------|-----------|--|--|--|
| Development Number Name/HA-Wide Activities | General Description of Major Work Categories | Dev. Acct No. | Quantity | Total Estimated Cost | | Total Actual Cost | | Status of Work | | |
| | | | | Original | Revised | Obligated | Expended | | | |
| CA39PO52003 Homestead Terrace | Partial Funding to Complete Building Repairs (siding repairs, painting, fencing, gutters, & community building) | 1460 | 5 Bldg. | \$ 219,000 | \$ 257,551 | \$ 0 | \$ 0 | Moved \$217,551 from CFP 501- 05; HT Repairs Bids Came in Too High | | |
| CA39PO52004 Casa Nova | Partial Funding to Replace Site Lighting | 1450 | 12 Bldg. | \$ 14,000 | \$ 14,000 | \$ 0 | \$ 0 | More Funds Needed | | |
| CA39PO52006 Golden Hinde | Partial Funding to Replace Site Lighting | 1450 | 13 Bldg. | \$ 3,400 | \$ 3,400 | \$ 0 | \$ 0 | More Funds Needed | | |
| | Replace Flat Roofing on 7 Buildings | 1460 | 7 Bldg. | \$ 0 | \$ 0 | \$ 0 | \$ 0 | Work moved to CFP 501-05 & contract awarded to IMR Roofing | | |
| CA39PO52007 Kruger Pines | Replace Flooring in Public Areas | 1460 | | \$ 15,000 | \$ 15,000 | \$ 0 | \$ 0 | Planning Underway | | |
| | Replace Remaining Mailboxes | 1460 | | \$ 2,000 | \$ 2,000 | \$ 0 | \$ 0 | For Installation | | |
| | Repairs to Existing Fire Sprinkler System | 1460 | 1 Bldg. | \$ 55,398 | \$ 55,398 | \$ 0 | \$ 0 | Investigating Possibilities | | |
| | Replace Sliding Glass doors & Windows | 1460 | 1 Bldg. | \$ 0 | \$ 79,500 | \$ 0 | \$ 0 | More Funds Needed | | |
| PHA Wide 052 | Procurement Coordinator | 1408 | | \$ 37,000 | \$ 41,000 | \$ 41,000 | \$ 19,421 | Thru 12/31/07 | | |

Annual Statement

Capital Fund Program (CFP)

Part II: Supporting

Pages

| PHA Name: Housing Authority of the County of Marin | | Grant Type and Number Capital Fund Program Grant No: CA39P05250106 | | | | Revision No. 3 | | | Federal FY of Grant: <u>2006</u> |
|--|--|---|----------|----------------------|------------|-------------------|-----------|--|--|
| Development Number Name/HA-Wide Activities | General Description of Major Work Categories | Dev. Acct No. | Quantity | Total Estimated Cost | | Total Actual Cost | | Status of Work | |
| | | | | Original | Revised | Obligated | Expended | | |
| Agency Wide | Facilities & Services Manager | 1408 | | \$ 26,500 | \$ 44,126 | \$ 44,126 | \$ 30,848 | Thru 8/31/07 | |
| | Contract Administrator | 1410.2 | | \$ 103,000 | \$ 103,000 | \$ 89,900 | \$ 47,350 | Thru 12/31/07 | |
| | Architectural Fees | 1430 | | \$ 18,306 | \$ 11,680 | \$ 0 | \$ 0 | H&Y Architects | |
| | General Site Labor | 1450 | | \$ 0 | \$ 0 | \$ 0 | \$ 0 | Moved \$32,500 in Funds to CFP 501- 05 to Cover GH Flat Roofing | |
| | Repairs to Landscaping & Irrigation System at Elderly/Disabled Complexes | 1450 | | \$ 7,018 | \$ 7,018 | \$ 0 | \$ 0 | Moved \$28,996 in Funds to CFP 501- 05 to Cover GH Flat Roofing | |
| | REAC Improvements | 1450 | | \$ 0 | \$ 0 | \$ 0 | \$ 0 | Moved \$12,504 in Funds to CFP 501- 05 to Cover GH Flat Roofing | |
| | Energy Conservation Improvements at Elderly/Disabled Complexes | 1460 | | \$ 12,180 | \$ 12,180 | \$ 0 | \$ 0 | +40% of the \$30,450 Funds Added by HUD: Moved \$25,000 in Funds to CFP 501- 05 to Cover GH Flat Roofing | |
| | Accessibility Improvements at Elderly/Disabled Complexes | 1460 | | \$ 7,167 | \$ 7,167 | \$ 0 | \$ 0 | Planning Underway | |
| | Painting Improvements at Elderly/Disabled Complexes | 1460 | | \$ 85,000 | \$ 13,202 | \$ 13,202 | \$ 13,202 | Completed: Remainder of work in 2007 moved to CFP 501-05 | |

Annual Statement
Capital Fund Program (CFP)

Part III: Implementation

Schedule

| PHA Name: Housing Authority of the County of Marin | | Grant Type and Number Capital Fund Program No: <u>CA39P05250106</u> | | | | | Federal FY of Grant: <u>2006</u> | |
|--|--------------------|--|--------|--------------------|---------|--------|--|--|
| | | Revision No. 3 | | | | | | |
| Development Number Name/HA-Wide Activities | All Fund Obligated | | | All Funds Expended | | | Reasons for Revised Target Dates | |
| | Original | Revised | Actual | Original | Revised | Actual | | |
| CA39P052001 Golden Gate Village | 07/18/08 | | | 07/18/10 | | | Obligation & Expenditure "Start Date" will be <u>July 18, 2006.</u> ACC to be executed by HUD on 7/18/2006. | |
| CA39P052002 Venetia Oaks | 07/18/08 | | | 07/18/10 | | | Expenditure Deadline for FFY 2006 Grant is Four Years (or <u>July 18, 2010</u>). | |
| CA39P052003 Homestead Terrace | 07/18/08 | | | 07/18/10 | | | | |
| CA39P052004 Casa Nova | 07/18/08 | | | 07/18/10 | | | | |
| CA39P052006 Golden Hinde | 07/18/08 | | | 07/18/10 | | | | |
| CA39P052007 Kruger Pines | 07/18/08 | | | 07/18/10 | | | | |
| PHA Wide 052 Agency Wide | 07/18/08 | | | 07/18/10 | | | | |

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(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
- 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) pages 61-63.

**Capital Fund Program Five-Year Action Plan
Part I: Summary**

| PHA Name Housing Authority of the County of Marin | | | | <input checked="" type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revision No: | |
|---|--------------------|--|--|---|--|
| Development Number/Name/HA-Wide | Year 1 FFY 2008 | Work Statement for Year 2 FFY Grant: 2009 PHA FY: 2009 | Work Statement for Year 3 FFY Grant: 2010 PHA FY: 2010 | Work Statement for Year 4 FFY Grant: 2011 PHA FY: 2011 | Work Statement for Year 5 FFY Grant: 2012 PHA FY: 2012 |
| 52-1 Golden Gate Village | Annual Statement | 355,480 | 345,880 | 354,280 | 353,680 |
| 52-2 Venetia Oaks | | | | | |
| 52-3 Homestead Terrace | | | | | |
| 52-4 Casa Nova | | | | | |
| 52-6 Golden Hinde | | 160,986 | | | |
| 52-7 Kruger Pines | | | 50,000 | | 125,786 |
| PHA-Wide | | 115,829 | 131,829 | 117,829 | 118,829 |
| Elderly/Disabled Wide | | 76,000 | 180,586 | 236,186 | 110,000 |
| Total CFP Funds (Est.) | | \$708,295 | \$708,295 | \$708,295 | \$708,295 |
| Total Replacement Housing Factor Funds | 0 | 0 | 0 | 0 | 0 |

Capital Fund Program Five-Year Action Plan
Part II: Supporting Pages—Work Activities

| Activities for Year 1 2008 | Activities for Year 2 FFY Grant: 2009 PHA FY: 2009 | | | Activities for Year 3 FFY Grant: 2010 PHA FY: 2010 | | |
|-------------------------------|--|---------------------------------|-----------------|--|--|-----------------|
| | Development Number/Name | Major Work Categories | Estimated Costs | Development Number/Name | Major Work Categories | Estimated Costs |
| See | 52-1 Golden Gate Village | Replace High-Rise Water Heaters | 34,000 | 52-1 Golden Gate Village | Replace High-Rise Water Heaters | 36,000 |
| Annual Statement | | Repair Broken Sidewalks | 10,000 | | Repair Broken Sidewalks | 10,000 |
| | | Interior/Exterior Painting | 166,000 | | Interior/Exterior Painting | 170,000 |
| | | Replace Kitchen Cabinets | 69,480 | | Replace Kitchen Cabinets | 52,880 |
| | | Landscape/Irrigation | 14,000 | | Landscape/Irrigation | 12,000 |
| | | Replace Low-Rise Furnaces | 26,000 | | Replace Low-Rise Furnaces | 27,000 |
| | | Replace Low-Rise Water Heaters | 8,000 | | Replace Low-Rise Water Heaters | 9,000 |
| | | Replace Stoves | 16,000 | | Replace Stoves | 16,000 |
| | | Replace Refrigerators | 12,000 | | Replace Refrigerators | 13,000 |
| | Sub-total | | 355,480 | Sub-total | | 345,880 |
| | 52-6 Golden Hinde | Repair/Replace Siding | 160,986 | 52-7 Kruger Pines | Improvements to Walkway & Stairs on Hillside | 50,000 |
| | Sub-total | | 160,986 | Sub-total | | 50,000 |
| | PHA-Wide | Management Improvements | 45,000 | PHA-Wide | Management Improvements | 46,000 |
| | | Administration | 70,829 | | Administration | 70,829 |
| | | | | | Energy Audit (Every 5 Years) | 15,000 |
| | Sub-Total | | 115,829 | Sub-Total | | 131,829 |
| See | Elderly/Disabled Wide | Landscape/Irrigation | 15,000 | Elderly/Disabled Wide | Landscape/Irrigation | 15,000 |
| Annual Statement | | Repair Broken Sidewalks | 5,000 | | Repair Broken Sidewalks | 5,000 |
| | | Interior/Exterior Painting | 26,000 | | Interior/Exterior Painting | 26,000 |
| | | General Repairs to | 30,000 | | General Repairs to | 40,000 |

**Capital Fund Program Five-Year Action Plan
Part II: Supporting Pages—Work Activities**

| Activities for Year 4 FFY Grant: 2011 PHA FY: 2011 | | | Activities for Year 5 FFY Grant: 2012 PHA FY: 2012 | | |
|--|---|------------------|--|---|-----------------|
| Development Number/Name | Major Work Categories | Estimated Costs | Development Number/Name | Major Work Categories | Estimated Costs |
| 52-1 Golden Gate Village | Landscape/Irrigation | 12,000 | 52-1 Golden Gate Village | Landscape/Irrigation | 12,000 |
| | Repair Broken Sidewalks & Stairs | 10,000 | | Repair Broken Sidewalks & Stairs | 10,000 |
| | Interior/Exterior Painting | 172,000 | | Interior/Exterior Painting | 174,000 |
| | Replace Kitchen Cabinets | 51,000 | | | |
| | Repair Water Distribution System (Partial) | 10,000 | | Repair Water Distribution System (Partial) | 87,680 |
| | A & E for Water Distribution Work | 32,280 | | | |
| | Replace Low-Rise Furnaces | 28,000 | | Replace Low-Rise Furnaces | 29,000 |
| | Replace Low-Rise Water Heaters | 9,000 | | Replace Low-Rise Water Heaters | 10,000 |
| | Replace Stoves | 17,000 | | Replace Stoves | 17,000 |
| | Replace Refrigerators | 13,000 | | Replace Refrigerators | 14,000 |
| | Sub-total | | | 354,280 | Sub-total |
| PHA-Wide | Management Improvements | 47,000 | PHA-Wide | Management Improvements | 48,000 |
| | Administration | 70,829 | | Administration | 70,829 |
| Sub-total | | 117,829 | | | 118,829 |
| | | | 52-7 Kruger Pines | Replace Roofing | 125,786 |
| | | | Sub-total | | 125,786 |
| Elderly/Disabled Wide | Landscape/Irrigation Repairs | 15,000 | Elderly/Disabled Wide | Landscape/Irrigation Repairs | 15,000 |
| | Repair Broken Sidewalks & Stairs | 5,000 | | Repair Broken Sidewalks | 5,000 |
| | Interior/Exterior Painting | 28,000 | | Interior/Exterior Painting | 30,000 |
| | General Repairs to Interiors/ Replace Appliances | 50,000 | | General Repairs to Interiors/ Replace Appliances | 60,000 |
| | Repaint Exteriors: CN, KP, VO,GH | 138,186 | | | |
| Sub-total | | 236,186 | Sub-total | | 110,000 |
| | Interiors/Appliances | | | Interiors/Appliances | |
| | | | | Slurry Coat Parking Lots | 50,000 |
| | | | | Repaint Exteriors | 44,586 |
| | Sub-total | 76,000 | Sub-total | | 180,586 |
| Total CFP Estimated Costs | | \$708,295 | | | |
| \$708,295 | | | | | |
| Total CFP Estimated Costs | | \$708,295 | | | |
| \$708,295 | | | | | |

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:
 2. Development (project) number:
 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:

MHA Board and the community are exploring opportunities for homeownership and sustainability of Marin City GGv due to the financial challenges of the site. The exploration may include the viability of the site with mixed income and or finances.

- 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:

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

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: | <u>(DD/MM/YY)</u> |
| 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: | |
| 1b. Development (project) number: | |
| 2. Federal Program authority: | <input type="checkbox"/> HOPE I <input type="checkbox"/> 5(h) <input type="checkbox"/> Turnkey III <input 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 type="checkbox"/> Planned application |
| 4. Date Homeownership Plan/Program approved, submitted, or planned for submission: (DD/MM/YYYY) | |
| 5. Number of units affected: | |
| 6. Coverage of action: (select one) | <input 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.)

2. Program Description:

See Attachment Section 8 Homeownership Program

a. Size of Program

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

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: *See attachment 18D (1) Chapter 25 of the Administrative Plan*

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.

The Quality Housing and Work Responsibility Act of 1998 requires that housing authorities set forth in their Annual Plans a description of how they plan to address the Community Service Requirement. On November 14, 2000, the Housing Authority Board of Commissioners adopted the Community Service portion of Marin Housing's Occupancy Policy for Public Housing.

Since HUD reinstated the community service MHA has been working with individuals who must complete those hours.

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? 04/26/99

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 (describe)

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 (list below)

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) |
| R.O.S.S Family Career Development Center | 100 | Special Criteria | Women Helping All People | Public Housing |
| R.O.S.S. | 125 | Special Criteria | Project offices on site at five Mixed Population Complexes | Public Housing |
| YEMP | 15 | Special Criteria | Resident Council (on site) | Public Housing |
| | | | | |

(2) Family Self Sufficiency program/s

a. Participation Description

| Family Self Sufficiency (FSS) Participation | | |
|--|---|---|
| Program | Required Number of Participants (start of FY 2000 Estimate) | Actual Number of Participants (As of: 06/31/07) |
| Public Housing | | 50 |
| Section 8 | 47 | 130 |

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?
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

A lease requirement of the Public Housing Program is that:

Each non-exempt adult Resident must contribute eight (8) hours of community service each month in the community in which the Resident's public housing project is located, or participate in an economic self-sufficiency program for 8 hours each month, or combine the performance of community service and an economic self-sufficiency program for a total of 8 hours per month.

Community Service is the performance of volunteer work or duties that are a public benefit, and that serve to improve the quality of life, enhance Resident self-sufficiency, or increase Resident self-responsibility in the community. Community service is not employment and may not include political activities.

Each eligible adult is responsible for having the volunteer agency report to Marin Housing the number of hours that the Resident has completed each month. If the family is in non-compliance with the community service requirement, Marin Housing may, at its discretion, enter into an agreement allowing the non-compliant adult to cure the non-compliance by entering into an agreement that they will make up the missed hours as well as maintain the current hours during the next 12-month period. If the family fails to complete all required community service hours as specified under the agreement, Marin Housing shall serve the household with a 30-Day notice to terminate the tenancy for breach of the lease.

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)

Working with the Sheriff's Department to expand police presence and to develop a community approach to law enforcement and tenant responsibility for their property.

2. What information or data did the PHA use 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)

Which developments are most affected? (List below)

Marin City Public Housing

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 (describe below)

2. Which developments are most affected? (list below)

Marin City GGV Public Housing

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)

Community Task Force to develop action plan to reduce violence in the community

2. Which developments are most affected? (List below)
Marin City GGV Public Housing

D. Additional information as required by PHDEP/PHDEP Plan

PHAs eligible for FY 2000 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 2002 in this PHA Plan?
 Yes No: This PHDEP Plan is an Attachment.

14. RESERVED FOR PET POLICY

[24 CFR Part 903.7 9 (n)]

The pet policy was modified to clarify definition of a “pet” vs. a “service animal” and to include a waiver of the pet deposit when requested as a reasonable accommodation based on disability for a service animal.

“A pet” shall be defined only as any dog (weight not to exceed 15 pounds as an adult), a cat, bird, (only two, and not large parrots or other large birds), fish aquarium (not to exceed 10 gallons), rodents (only two, and only rabbits, guinea pigs, hamsters, or gerbils), and turtle (only two).

“A service animal” shall be defined as a dog (the weight limit of 15 pounds does not apply) or a cat where it has been established that a person with disabilities is in the household and the animal is necessary as a reasonable accommodation to provide designated service for the disabled resident or family member.

It is also being clarified in the policy that as a reasonable accommodation a disabled resident may request a waiver to the pet deposit. This clarification is as follows:

“Where a resident has requested a waiver of the pet deposit and fees to house a service animal as a reasonable accommodation based on the disability, and where verification of such a need is presented, the pet deposit and fees may be waived by the Housing Authority County of Marin.”

It is also being clarified that “service animals” are not restricted from being in any area on the complex when accompanied by resident and on a leash when on the grounds. This clarification is as follows:

“The following areas are designated no-pet areas: Patios in the high-rise buildings, laundry rooms, community rooms, courtyards, playgrounds, and lawns. (This restriction does not apply to “service animals” when they are in the company of the resident or a family member on a leash.)”

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. (See pages 2-4)

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.) 2006 Audit completed September 28, 2007.
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?
*MHA completed an energy audit and utility analysis based on consumption and mechanical usage. MHA is working with the GGV community to encourage reductions in consumption and greater responsibility for utility usage. Excess utility charges has been recalculated to reflect results from the audit and MHA will monitor progress to reduce energy use.
See also Component 7 – Capital Fund*

What types of asset management activities will the PHA undertake? (Select all that apply)

Not applicable

- Private management
- Development-based accounting as required by HUD effective 1/1/08
- Comprehensive stock assessment
- Other: (list below)

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?

2. If yes, the comments are: (If comments were received, the PHA **MUST** select one)

- Attached at Attachment (File name) *Resident Advisory Board comments*
 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:
Changes from the RAB were integrated into the Plan prior to the public comment period.
 Other: (list below)

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.)

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 apply to the Board of Supervisors
 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)
 Any adult recipient aged 62 or older of PHA assistance

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)

MHA has two resident commissioners who are appointed to the Board by the County Board of Supervisors through a public selection process.

D. 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: County of Marin

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. (List below)
Shelter Plus Care program, the HOPWA program, the Rehabilitation Loan program, and the Continuum of Care.
 - Other: (list below)
3. The Consolidated Plan of the jurisdiction supports the PHA Plan with the following actions and commitments: (describe below)
The jurisdiction provides funding for the Rehabilitation Loan program, is a partner in the Continuum of Care process, provides funding for the Shelter Plus Care, Rental Deposit Guarantee, the Housing Assistline, Senior Information and Referral Program, Rebate for Marin Renters, Housing Search Specialist, and HOPWA program.

D. Other Information Required by HUD

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

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:

- Section 3, Page 79: Admissions Policy for Deconcentration
- Component 7, Page 44: FY 2007 Capital Fund Program Annual Statement
- Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)
- Section 18D, Page 89: Resident Membership of the PHA Governing Board and Membership of the Resident Advisory Board (see Resident Comments)
- Voluntary Conversion Initial Assessments

Optional Attachments:

- Page 41: PHA Management Organizational Chart
- Component 7, Page 44: FY 2006 Capital Fund Program 5 Year Action Plan
- Public Housing Drug Elimination Program (PHDEP) Plan
- Other (List below, providing each attachment name)
 - Changes to Agency Plan
 - Changes to Administrative Plan
 - Changes to Admissions & Continued Occupancy Plan
 - Section 8 Homeownership Program and Chapter 25 of Administrative Policy
 - Deconcentration Policy
 - Progress Report: Annual Plan Goals

Other Programs Operated by MHA include:

- Substantial Rehabilitation Program – Bradley House which consists of 18 units of housing designated for Elderly and Disabled Individuals or families.
- Two State Programs – Isabel Cook which is 14 units of family housing and 4 unit of housing designated for Elderly and Disabled Individuals or families.
- Fairfax Vest Pocket – a shared multi-generational living environment for Elderly and Disabled Individuals or families in 19 bedrooms in 5 houses.
- Private Housing Operations – Sundance Apartments

Definition of “significant amendment” and substantial deviation”

- Changes to the admission policies or organization of the waiting list that will affect a substantial number of applicants
- Changes to the calculation of rent not HUD mandated
- Changes to the use of funds under the Capital Funds that exceed the amount of \$50,000.00
- Addition of new activities not included in the current Administrative Plan, Admissions and Continued Occupancy Policy or Annual Plan that affect a substantial number of residents or participants and is not mandated by HUD. (Substantial number is more than 70% of the population)
- Changes with regard to demolition or disposition, designation, homeownership programs or conversion activities
- Additions of non-emergency work items

Changes for Agency Plan for Marin Housing Authority and the Administrative Plan and Admissions and Continued Occupancy Policy

The changes proposed for the MHA Agency Plan are contained in the Admissions and Continuing Occupancy Plan for Public Housing and the Administrative Plan for the Section 8 Program. While these changes have been summarized previously, the actual policy and procedural changes are set forth below. A legend is provided to understand the keys to each change.

Changes to the Agency Plan Section

VAWA

This year in the Agency Plan the Violence Against Women Act signed into law in 2005 as a result of the Department of Justice efforts, MHA will develop the 5-Year Strategic Goal of "Ensuring Equal Opportunity in Housing for all Americans." The 5-Year Plan language will be as follows:

"To comply with the Violence Against Women and Department of Justice Reauthorization Act of 2005, the Housing Authority has implemented policies protecting victims of domestic violence from discrimination. The Section 8 Program has also implemented policies permitting owners to bifurcate the lease of those in a violent relationship, allowing the victim of violence to remain in the unit. The Housing Authority will not deny admission to an applicant who is or has been a victim of domestic violence, dating violence, or stalking, if the person otherwise qualifies for assistance. Additionally, the Housing Authority will not evict a current tenant solely because the resident is or has been a victim of domestic violence, dating violence, or stalking."

In its Annual Plan, the MHA will craft the language and program changes to meet the challenge of domestic violence against women. MHA has a long-standing history of aiding families in this situation but improvements will be made to be wholly consistent with this Law. The Language for the Annual Plan will include the following statements and detailed listings:

A description of activities, services, or programs that are provided, offered, or even arranged that address the three (3) areas: 1) to adult and children of domestic violence, dating violence, or stalking, 2) to aid adult and children in their housing situation, and 3) to aid adult or children in their victim safety and protection.

These VAWA changes have been published by HUD and are intended as non-discretionary policy mandates. Those are generally not included in the Agency Plan process, although the language is added to the Administrative Plan. However, HUD wants participants, residents, and applicants to have a comprehensive understanding of the importance the Department places on this Law. Actually, while discussion on implementation is strongly desired, the underlying policy is not open to debate. It is meant to be an overarching protection for residents, participants, and applicants to know the rights of victims of abuse with regard to subsidized housing.

The amendments of VAWA for the two principal MHA programs of Section 8 and Public Housing are near identical. The Agency Plan applies to both programs, so this language applies to both programs.

SECTION 504 REASONABLE ACCOMMODATION

In the Executive Summary of the Agency Plan's Annual Plan Section, it is advisable to make a statement to the following effect:

The MHA has developed a more comprehensive "reasonable accommodation" policy and procedures section in the Section 8 Administrative Plan and the Public Housing's Admissions and Continued Occupancy Policy. These updates are to more completely update the needs of the applicants, residents and participants of the MHA subsidized housing programs, and to make the execution of plans to address those needs more uniform.

INTERIM RENT RE-EXAMINATIONS

In the Executive Summary of the Agency Plan's Annual Plan Section, and also in the Annual Plan under Rent Determinations, it is advisable to make a statement to the following effect:

In order to administer the program in a more efficient manner and yet preserve a sense of fairness to residents and participants, the existing interim rent determination policy will be modified and clarified to reflect a illness/event of catastrophic nature that was not anticipated at the time of the annual rent determination, between annual re-examinations. The definition to be determined with input from the RAB.

Changes to the Administrative Plan Section 8

Section 8 Housing Choice Voucher Program Administrative Plan

Revision Keys:

- Retain the Language as Is in the Administrative Plan is **Shaded with Light Gray**
- ~~Strikethrough of Language~~ Means it is Deleted from that Section in this Revision
- New Language Is Not Shaded and “Is in a Different Font” –
- To Facilitate Discussion between the Residents on the RAB and MHA, Reasons Are Provided for Most of the Major Changes in Language; Where There Isn’t a Reason, Generally this Means that It Is Not Discretionary

MAJOR CHANGE 1 VAWA: Administrative Plan

1. **New Language:** The following definitions have been added to the Glossary of the Section 8 Administrative Plan. These terms are added as a result of the amendments to the 1937 Housing Act, which emanate from changes due to the passage of VAWA. The terms added are:

“1. *Domestic Violence* is defined to include “felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction.

2. *Dating Violence* is defined to mean “violence committed by a person: A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and B) where the existence of such relationship shall be determined based on a consideration of the following factors: (i) The length of the relationship; (ii) the type of relationship; and (iii) the frequency of interaction between the persons involved in the relationship.”

3. *Stalking* is defined to mean: (A) (i) to follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate another person; or (ii) to place under surveillance with the intent to kill, injure, harass, or intimidate another person; and B) in the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to (i) that person; (ii) a member of the immediate family of that person; or (iii) the spouse or intimate partner of that person”; and

4. *Immediate family* is defined to mean, “with respect to a person: (A) a spouse, parent, brother or sister, or child of that person, or an individual to whom that person stands in loco parentis (in place of parents); or (B) any other person living in the household of that person and related to that person by blood or marriage.”

2. Statement of Policies and Objectives

New Language: Chapter 1, 1-2, D.

“It is the policy of the Housing Authority to comply fully with the Violence Against Women and Department of Justice Reauthorization Act of 2005 and implement policies protecting victims of ‘domestic violence’ from discrimination.”

“To comply with the Violence Against Women and Department of Justice Reauthorization Act of 2005, the Housing Authority has implemented policies protecting victims of domestic violence from discrimination. The Section 8 Program has also implemented policies permitting owners to bifurcate the lease of those in a violent relationship, allowing the victim of violence to remain in the unit. The Housing Authority will not deny admission to an applicant who is or has been a victim of domestic violence, dating violence, or stalking, if the person otherwise qualifies for assistance. Additionally, the Housing Authority will not evict a current tenant solely because the resident is or has been a victim of domestic violence, dating violence, or stalking.”

3. Eligibility for Admission

New Language: Chapter 3, I. “Other Criteria for Admissions, page 3-8

- “MHA will not use as a basis for denial of admission that any applicant was the victim of domestic violence, dating violence, or stalking (“abuse”) if the applicant otherwise qualifies for admission or assistance (pursuant to Sec. 606 & 607 of VAWA 2005).”

4. Establishing Preference and Maintaining the Waiting List

New Language: Section D. Local Preferences, 1. Domestic Violence, page 4-3

➤ New Third paragraph: “The victim must provide a certification within 14 days of the request from the MHA that names the perpetrator, under a confidentiality agreement. It must be certified by a law enforcement, or self-certified with a neutral third party verification, as prescribed by HUD in its establishment of this requirement, and signed by the employee, agent, volunteer or other provider of social services, attorney, or medical professional.”

➤ Add Notation End of Section 1. “MHA has an ongoing and long-standing approach and commitment to the housing needs of victims of domestic violence. Where there is any conflict in the application of the “definition” of a victim of domestic violence between the established local preference, and the “domestic violence” definition added in the glossary pursuant to VAWA, the VAWA definitions for domestic violence supersede.”

5. Verification Procedures

New Language: Section on “Split Households – Domestic Violence, page 7-18

New Language: Add to existing language in this section – “Verification of the status of a victim of domestic violence as defined under VAWA 2005 must consider and differentiate between the abuser and the victim, so as not to deny housing assistance to an applicant “victim” who otherwise qualifies for the housing.

6. Request for Tenancy Approval and Contract Execution

New Language: Section E. Information to Owners, pages 9-5

New Language: “MHA will provide information to owners of their rights and obligations under Section 8 as amended by VAWA 2005. This information will include the ability to bifurcate the lease to remove the abuser in a domestic violence situation, and the prohibition from discriminating against the victim of domestic violence in screening applicants for suitability.”

7. Moves with Continued Assistance (Transfers)

New Language: Section A. Allowable Moves page 15-1

New Language:

“5. The family may move if a family “split” due to domestic violence has occurred and the move is requested to protect the health and safety of an individual who is the victim of the domestic or dating violence or stalking. The family moving under this situation must have otherwise complied with all of the terms and obligations of their lease. HUD regulations implementing VAWA 2005 allow the prior lease to be bifurcated to remove the abuser in the situation. The acceptable means of certification of the domestic violence, as prescribed by HUD, must be provided by the victim to the owner or MHA.”

8. Portability

New Language: Section B. Determining Eligibility, Program Requirements for Participant Families, page 16-2

New Language in Second Paragraph: “A participant family may move in violation of the lease under the portability procedures if the family has complied with all other obligations of the voucher program and has moved out of the assisted dwelling unit in order to protect the health and safety of an individual who is or has been the victim of domestic violence, dating violence, or stalking.”

9. Denial or Termination of Assistance

New Language: Section A. Grounds for Denial or Termination of Assistance, page 17-2

New Language:

“8. Any family member who engages, or who has engaged, in physical acts of violence against family members or others, that fall under the parameters of domestic violence, dating violence, or stalking as defined and authorized by the VAWA of 2005 shall be denied assistance or terminated in accordance with the procedures prescribed by federal, state, and local law for termination of leases.”

10. Contract Terminations

New Language: Section B. Termination by the Family: Moves, page 18-1

Any move that breaches the terms of the lease will disqualify the family for a transfer voucher.

New Language: Family **moves that breach the terms of the lease will disqualify the family for a transfer voucher.** A violation of the lease when the victim of domestic violence has moved to protect the health and safety of an individual who is or has been the victim of domestic violence shall not be grounds for denial of continuing assistance for the victim.

MAJOR CHANGE No. 2 SECTION 504 Reasonable Accommodation: Administrative Plan

E. SERVICE POLICY/ACCOMMODATIONS page 1-3 & 1-4 [Cross Reference to Chapter 29 for Policy and Procedures]

This policy is applicable to all situations described in this Administrative Plan when a family initiates contact with MHA, when MHA initiates contact with a family including when a family applies, and when MHA schedules or reschedules appointments of any kind.

It is the policy of MHA to be service-directed in the administration of all housing programs, and to exercise and demonstrate a high level of professionalism while providing housing services to the families within Marin County.

Persons with Disabilities

MHA's policies and practices will be designed to provide assurances that all persons with disabilities will be provided reasonable accommodation so that they may fully access and utilize the housing program and related services. The availability of specific accommodations will be made known by including notices on MHA forms and letter to all families and all requests will be verified so that MHA can properly accommodate the need presented by the disability.

Federal Americans with Disabilities Act of 1990

1. With respect to an individual, the term "disability" means:
 - A physical or mental impairment that substantially limits one or more of the major life activities of an individual;
 - A record of such impairment; or
 - Being regarded as having such an impairment
2. Those "regarded as having such an impairment" may include those with conditions such as obesity or cosmetic disfigurement, and individuals perceived to be at high risk or incurring a work-related injury.
3. Individuals with contagious diseases who do not pose a direct threat to others are covered by the Act. Persons with AIDS and those who test positive for HIV virus are considered to have a disability.
4. An individual who has an infectious or communicable disease that is transmitted to others through the handling of food, the risk of which cannot be eliminated by reasonable accommodation, may be refused an assignment or a continued assignment to a job involving food handling. The Secretary of Health and Human Services annually will publish a list of those diseases that are transmitted through food handling.

5. Rehabilitated alcohol and drug users are considered to be persons with disabilities for purposes of the Act. However, current alcohol and drug users can be held to the same qualification standards for job performance as other employees.

Section 504

No otherwise qualified individual with disabilities in the United States shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Section 504 requires Section 8 agencies to affirmatively ensure that people with disabilities are given an equal opportunity to participate in the Section 8 program. HUD's Section 504 regulations, which are contained in 24 CFR 8 (Subpart A-E) provide a more detailed explanation of Section 8 responsibilities.

A qualified person with a handicap:

Must be afforded an opportunity equal to that afforded to others, and/or

Must be provided housing or benefits as effective as those afforded to others, and/or

May not be provided different or separate housing or benefits unless necessary to provide the person with a disability with housing or benefits that are as effective as those provided to others

The law is designed to afford people with disabilities an “equal opportunity to obtain the same result, to gain the same benefit, or to reach the same level of achievement” as those who do not have disabilities.

MHA is obligated to administer the tenant-based assistance program in the most integrated setting possible that is appropriate to the needs of qualified individuals rather than separate the individual from the general population.

In any case, a participant with a disability *must ask* for an accommodation of their disability before the housing agency treats them differently.

Reason: This first section is simply an introduction to the concept of 504. It has a listing from the federal code of regulations of all of the definitions of “disability.” This general statement can stand alone but refer to the New Chapter 29 which provides the uniformity in implementation of Policies and Procedures for Reasonable Accommodation.

Undue Hardship page 1-4

Requests for reasonable accommodation from persons with disabilities will be granted upon verification that they meet the need presented by the disability and they do not create an “undue financial and administrative burden” for MHA, meaning an action requiring “significant difficulty or expense.”

In determining whether an accommodation would create an undue hardship, the following guidelines will apply:

- The nature and cost of the accommodation needed;
- The overall financial resources of the facility or facilities involved in the provision of the reasonable accommodation; and
- The number of persons employed at such facility, the number of families likely to need such accommodation, the effect on expenses and resources, or the likely impact on the operation of the facility as a result of the accommodation.

- e. Acceptance. Upon receipt of the 504 RA36, Certification Of Need for Reasonable Accommodation, confirming that the individual is a person with disabilities and the accommodation requested is related to his/her disability and is needed to enable him/her to have equal access the program, the MHA will determine if the requested accommodation is reasonable. An accommodation is not reasonable if it would constitute a direct threat to the health and safety of other individuals; result in substantial physical damage to the property of others; require changes, adjustments, or modifications to existing programs that would be substantial; result in a fundamental alteration of the program; *or an undue administrative or financial burden if granted. [emphasis added]* If the request is determined to be reasonable, the MHA will send the applicant or resident/participant a Reasonable Accommodation Approval Notice (Form S504-04).

Reason: The goal is to move all elements that don't relate specifically to calculations into one location in the Administrative Plan. The thrust of this section is to indicate that the MHA cannot take onto itself a responsibility requiring a significant change to the budget and other administrative considerations. For example, MHA cannot build an elevator in a two story townhouse where the structural nature of the unit, the funds available in the capital or operating fund, or other considerations make this an unworkable solution. MHA must make the most focused consideration for the specific accommodation that has been requested and supported with certifications. Nonetheless, there are many specific actions in accessing services and making info on Section 8 owners with accessible units.

Verification of a Request for Accommodation page 1-5

~~All requests for accommodation or modification will be verified with a reliable, knowledgeable, medical professional.~~

~~Reasonable accommodation will be made for persons with a disability who require an interpreter or accessible offices. A designee will be allowed to provide some information, but only with the permission of the person with the disability.~~

~~All MHA mailings will be made available in an accessible format upon request, as a reasonable accommodation.~~

~~MHA utilizes organizations which provide assistance for hearing and sight impaired persons when needed. See **Attachment A** for a list of the agencies that will assist clients in accessing our services.~~

IV. DETERMINING NEED

- A. An applicant or resident/participant identifies the need for a particular reasonable accommodation for a family member with a disability by completing the Special Requirement(s) Questionnaire. (See Exhibit 29: 1C.). This form is included in application and income 504-RA examination packets. An applicant or resident/participant may request the form from MHA staff and submit it at any other time as needed.

After the need for a modification to a unit or an adjustment to MHA policies or procedures is identified and confirmed, the MHA will respond in accordance with the procedure outlined in Exhibit 29: 1C.

- B. An applicant or resident/participant who requires a reasonable accommodation as outlined in Exhibit 29: 1C may request it at any time during the application process or after admission to a program.
- C. The need for the particular accommodation requested by the participant shall be confirmed by a medical or mental health care provider, such as: a licensed physician, physical therapist, psychiatrist, or counselor. Confirmation will also be accepted from other service providers such as: a social worker, caseworker or counselor from a government or non-profit agency. Certification may be provided on the Certification of Need for Reasonable Accommodations (504-RA36 form) or other appropriate documentation (such as a letter to the MHA from one of the providers listed above on his/her letterhead) which identifies: 1) the individual as a person with disabilities, 2) the accommodation requested, and 3) how each accommodation requested is related to and necessary due to the individual's disability.

Reason: The goal is to move all elements that don't relate specifically to calculations into one location in the Administrative Plan. This is the main part of this Chapter on "Determination of Need." The forms that implement the procedures are included in the Chapter and can be used [like all elements] whether for the Section 8 or Public Housing programs. The issue of "undue hardship" has been addressed in a previous section.

B. DISALLOWANCE OF EARNED INCOME FROM RENT DETERMINATIONS FOR PERSONS WITH DISABILITIES (24 CFR 5.617), page 6-8
[Cross Reference Chapter 29]

MHA's policy is to encourage self-sufficiency for the disabled participants of the Housing Choice Voucher Program. The annual income for qualified families will not be increased as a result of increases in earned income of a family member who is a person with disabilities.

This income disallowance for the disabled family member begins on the date the increase in earned income began and continues for a cumulative 12-month period. After the disabled family member receives 12 cumulative months of the full exclusion, the total family's annual income will include a phase-in of half the earned income of the disabled family member.

A family qualifies for the earned income exclusion under the Housing Choice Voucher Program when:

- The disabled family member's income increases as a result of employment when that disabled member was previously unemployed for one or more years prior to the employment; or
- The disabled family member's annual income increases as a result of earned income during participation in any economic self-sufficiency or other job training program; or
- The disabled family member's annual income increases as a result of new employment or increased earnings of a family member during or within six months after receiving assistance, benefits or services under any State program for TANF provided that the total amount over a six-month period is at least \$500. The qualifying TANF assistance may consist of any amount of monthly income maintenance, and/or at least \$500 in such TANF benefits and services as one-time payments, wage subsidies and transportation assistance.

The HUD definition of "previously unemployed" includes a person with disabilities who has earned in the previous 12 months no more than the equivalent earnings for working 10 hours per week for 50 weeks at the minimum wage. Minimum wage is the prevailing minimum wage in the State or locally.

The HUD definition of an economic self-sufficiency program is: any program designed to encourage, assist, train or facilitate economic independence of assisted families or to provide work for such families. Such programs may include job training, employment counseling, work placement, basic skills training, education, English proficiency, workfare, financial or household management, apprenticeship, or any other program necessary to ready a participant to work (such as substance abuse or mental health treatment).

Qualifying increases are any earned income increases of a family member who is a person with disabilities during participation in an economic self-sufficiency or job training program and not increases that occur after participation, unless the training provides assistance, training or mentoring after employment.

The amount that is subject to the disallowance is the amount of incremental increase in income of a family member who is a person with disabilities. The incremental increase in income is calculated by comparing the amount of the disabled family member's income before the

beginning of qualifying employment or increase in earned income to the amount of such income after the beginning of employment or increase in earned income.

Initial Twelve-Month Exclusion

During the cumulative 12-month period beginning on the date a member who is a person with disabilities of a qualified family is first employed or the family first experiences an increase in annual income attributable to employment, MHA will exclude from annual income of a qualified family any increase in income of the family member who is a person with disabilities as a result of employment over the prior income of that family member.

Second Twelve-Month Exclusion and Phase-in

During the second cumulative 12-month period after the expiration of the initial cumulative 12-month period, MHA will exclude from annual income of a qualified family 50 percent of any increase in income of a family member who is a person with disabilities as a result of employment over income of that family member prior to the beginning of such employment.

Maximum Four Year Disallowance

The earned income disallowance is limited to a lifetime 48-month period for each family member who is a person with disabilities. For each family member who is a person with disabilities, the disallowance only applies for a maximum of 12 months of full exclusion of incremental increase, and a maximum of 12 months of phase-in exclusion during the 48-month period starting from the date of the initial exclusion.

If the period of increased income does not last for 12 consecutive months, the disallowance period may be resumed at any time within the 48-month period, and continued until the disallowance has been applied for a total of 12 months of each disallowance (the initial 12-month full exclusion and the second 12-month phase-in exclusion).

No earned income disallowance will be applied after the 48-month period following the initial date the exclusion was applied.

Reason: The goal is to move all elements that don't relate specifically to calculations into one location in the Administrative Plan. This section on the disallowance of earned income from rent determinations in this Chapter is well-placed here. For this reason, issues specifically related to calculations and rent determinations remain in the existing chapter. However, the cross reference to the Policies contained in Chapter 29 is intended to ensure all issues that need free-standing determinations are identified from those linked to the overall calculations. A cross reference is not unusual in policy development.

L. MEDICAL EXPENSES [24 CFR Section 5.609(a)(2), 5.603], page 6-22-6-24 [Cross Reference is Made to Chapter 29 "Reasonable Accommodation"]

When verifying disability assistance expenses, MHA shall keep in mind the privacy requirements under Health Insurance Portability and Accountability Act (HIPAA of 1996). HIPAA requires that patients sign a specific authorization before a covered entity can release their medical information to a third party for purposes not related to the patient's health care. If

MHA finds that verification requests are not completed and returned directly to MHA, MHA will have to rely on tenant provided documentation and document in the participant's file why third party verifications were not available.

Allowance for Disability Assistance Expense

Who is Eligible:

Families are entitled to a deduction for unreimbursed expenses to cover attendants and auxiliary apparatus for any family member who is a person with disabilities, to the extent these expenses are necessary to enable a family member (including the member who is a person with disabilities) 18 years of age or older to be employed.

Types of allowable unreimbursed costs for attendant care or auxiliary apparatus:

- Wheelchairs
- Walkers
- Scooters
- Ramps
- Adaptations to vehicles
- Service animals
- Special equipment to enable a blind person to read or type
- In-home care
- Adult day care
- Nursing
- Housekeeping
- Personal care
- Errand services
- An interpreter for persons who are hearing impaired.

When imposing the employment income ceiling, consider if the assistance enables more than one person to be employed. If so you must combine the incomes of those persons to determine the ceiling.

If an auxiliary apparatus enables the person with a disability to be employed and frees another person to be employed, the allowance cannot exceed the combined incomes of those two people.

Remember. It is a proper deduction only if these items are directly related to permitting the disabled person or other family member to work.

Disability assistance expenses include the cost of maintenance and upkeep of any auxiliary apparatus.

If the apparatus is NOT used exclusively by the person with a disability, you may prorate the total cost and allow a specific amount to be applied toward the deduction.

If both child care and a disability expense are needed to enable a person(s) in the family to work, the employment income used to justify the child care allowance for employment purposes may not be used to also justify a disability assistance allowance.

According to HUD Public Housing Occupancy Guidebook Chapter 10 page 125. The total for BOTH the disability assistance allowance and the child care allowance for employment purposes may not exceed \$150.00 per week or earned income, whichever is less.

This allowance is equal to the amount by which the cost of the care attendant or auxiliary apparatus exceeds three (3%) percent of the gross annual family income. However, the allowance may not exceed the earned income received by the family member who is 18 years of age or older who is able to work because of such attendant care or auxiliary apparatus.

Allowance for Medical Expenses

The medical expense deduction is permitted *only* for households in which the head or spouse is least 62 years old or disabled (elderly or disabled households).

If the household is eligible for a medical expense deduction, the medical expenses of all family members may be counted.

Medical expenses are expenses ANTICIPATED to be incurred during the 12 month period following certification or reexamination which are not covered by an outside source such as insurance or Medicare.

The medical allowance is *not intended* to give a family an allowance equal to last year's expenses, but to anticipate regular ongoing and anticipated expenses during the coming year.

Types of Allowable Medical Expenses:

- Services of doctors and health care professionals
- Services of health care facilities
- Expenses paid to HMO
- Medical care of a permanently institutionalized family member if his/her income is included in annual income
- Periodic attendant care
- Purchase or rental and upkeep of equipment (additional utility costs to the participant because of oxygen machine).
- Medical insurance premiums
- Prescription and non-prescription medicines and supplements prescribed by a physician
- Transportation to treatment
- Dental expenses
- Eyeglasses
- Hearing aids and batteries
- Live-in or periodic medical assistance
- Monthly payments or accumulated medical bills

If these are regular monthly payments on a bill that was previously incurred, the allowance may include only the amount expected to be paid in the coming 12 months.

If a family has medical expenses and no disability assistance expenses, the allowable medical expense is that portion of total medical expenses that exceeds three (3%) percent of the annual income.

Special Calculation For Households Eligible For Disability Assistance And Medical Expenses

If an elderly family or disabled family has both medical expenses and disability assistance expenses, a special calculation is required to insure that the family's 3% share of these expenses is applied only one time. Because the allowance for disability assistance expenses is limited by the amount earned by the person freed to work, the disability allowance must be calculated before the medical allowance is calculated.

When the family has disability assistance expenses that are less than 3% of annual income, the family will receive no allowance for disability assistance expense. However, the allowance for medical expenses will be equal to the amount by which the sum of both disability and medical expenses exceed 3% of annual income.

If the disability assistance expense exceeds the amount earned by the person who was freed for work, the allowance for disability assistance will be capped at the amount earned by that individual. When the household is also eligible for a medical expense allowance, however, the 3% may have been exhausted in the first calculation and it then will not be applied to medical expenses.

Reason: The goal is to move all elements that don't relate specifically to calculations into one location in the Administrative Plan. This section on the disallowance of earned income from rent determinations in this Chapter is well-placed here. For this reason, issues specifically related to calculations and rent determinations remain in the existing chapter. However, the cross reference to the Policies contained in Chapter 29 is intended to ensure all issues that need free-standing determinations are identified from those linked to the overall calculations. A cross reference is not unusual in policy development.

Section C. Chapter 11, Page 11-3

~~One of the purposes of an exception payment standard is to ensure that a family with a person with disabilities can rent a unit that meets the disabled person's needs specific to the disability. On a case by case basis, as a reasonable accommodation, a PHA may approve a payment standard up to 110 percent of the Fair Market Rents (FMR) if its payment standards are set below 110 percent of the FMR. Such special payment standards must be requested by the family,~~

~~Such special payment standards must be requested by the family, and subsequently approved as necessary, for a reasonable accommodation by the PHA after a family with a disabled person or an individual person with disabilities locates a unit. The HUD Field Office Public Housing Director can approve exception payment standards between 110 percent and 120 percent of the FMR as a reasonable accommodation; Headquarters must approve any exception payment standards higher than 120 percent of the FMR.~~

~~An exception to the payment standard may be granted because of the unit's physical amenities (grab bars, ramps, special features for the blind), structure (elevator building, ground floor unit), location (near a medical facility, place of treatment, school providing special education, close location to bus lines or other facilities) or because of other circumstances or needs attested to by the health care or service provider. The need for the accommodation must be addressed in the HACLA verification form or in the letter completed by the health care or service provider.~~

Higher Payment Standard Amount as a Reasonable Accommodation

The only time that MHA will allow a unit-by-unit exception to the payment standard is as a reasonable accommodation for a family with a family member with disabilities. MHA can increase the Payment Standard up to 120% of the Fair Market Rent.

New Language in Chapter 29, Exhibit 29, 1C. 30-31:

4. Section 8 Programs

a. Modifications to policy and procedure – MHA Program Administration.

If an applicant or participant family with a member with disabilities has a need for a reasonable accommodation, and the need has been certified, then the MHA may provide an accommodation in the form of a procedure or policy modification. Examples of accommodations that may be requested include, but are not limited to:

- (1) A larger subsidy size in order to rent a larger bedroom size unit to accommodate special needs such as accessibility, a live-in aide or large medical equipment.
- (2) A list of available known accessible units;
- (3) An extension of time to locate a unit;
- (4) *An exception to the Fair Market Rents or Voucher Payment Standards to allow the family to rent a unit accessible to the family up to 120 % of the HUD-Fair Market Rent subject to HUD approval; [emphasis added]*
- (5) An exception to the “renting to relatives rule” (except when prohibited by federal regulations);
- (6) Help in finding a unit;
- (7) Other reasonable accommodations, as requested and confirmed as and related to a person’s disability and necessary to enable him/her equal opportunity to participate in the program.

Reason: The goal is to move all elements that don’t relate specifically to calculations into one location in the Administrative Plans. There is a need to delete these two somewhat conflicting provisions to ensure that MHA has one interpretation of the aspects and time when an exception rent is allowed for “reasonable accommodation.” The new language in Chapter makes it clear that MHA will go up to 120 with HUD approval. MHA will make a determination with HUD whether a request for more than a case-by-case exception will be requested and allowed.

Note: *This had been identified as a significant change affecting rent determinations but in view of the fact it existed in two separate sections of Chapter 11, the location of this language in the New Chapter 29 is more than adequate without singling this change out from other 504 issues.*

Value of Accessibility

~~For the family that requires an accessible unit, the accessible features may justify a higher rent. For such families, the rent reasonableness determination must take those features into account.~~

Reason: This language is already incorporated in the previous New language identified for payment standards and made clear in Chapter 29.

4. **PUBLIC HOUSING TRANSFERS TO THE SECTION 8 PROGRAM** [Cross Reference to Chapter 29]

- Emergency transfer – is defined as one in which the resident can document and verify they are in a life threatening situation and that remaining in the public housing unit would not be safe. In this situation it is usually recommended that the family use a portable voucher and leave the county. Examples of this situation include, but are not limited to, the following:
 1. Documentation from a law enforcement agency or the court that verifies a life-threatening situation for a family member.
 2. Law enforcement requests witness relocation.
 3. Victims of hate crimes, including racial and ethnic harassment.
- Medical Hardship – will be granted only in cases of documented and verified medical need from a Doctor. The documentation must state that the medical need of the family cannot be met by remaining in the Public Housing project.
- Change in functioning ability of the family – will be granted only with documentation from a Doctor, mental health worker, or a program manager showing that the functioning of the family or a member of the family is such that the needs of the family or the family member cannot be met in the Public Housing project.
- Change in unit size – will be granted when the project manager requests a program transfer because the Public Housing project does not have an appropriate bedroom size unit in the project or does not expect to have an appropriate bedroom size unit available for more than 6 months.
- Opportunity for economic self-sufficiency – will be granted upon the presentation of documentation that shows that the family has an opportunity for economic self-sufficiency in another location, or has the opportunity to take advantage of the Section 8 homeownership program.
- Other approved reasons – will be determined on a case-by-case basis following a review by the requesting program manager and the Section 8 program manager.

In order to further their goals in the Family Self Sufficiency program, families in public housing will be encouraged to transfer to the section 8 Housing Choice Voucher choice program if they meet the following criteria:

1. Been an active participant in FSS for a minimum of 1 year, and
2. Have been employed for 1 year, and
3. Have paid all rent and charges on time to MHA for a minimum of 1 year, and
4. Have good credit or have completed a credit clean-up program and have followed necessary Action Plan.

5. SECTION 8 HOUSING CHOICE VOUCHER PROGRAM TO PUBLIC HOUSING PROGRAM TRANSFERS

- Emergency transfer – is defined as one in which the resident can document and verify they are in a life threatening situation and that remaining in the current housing situation would not be a safe alternative. Examples of this situation include, but are not limited to, the following:
 1. Documentation from a law enforcement agency or the court that verifies a life-threatening situation for a family member.
 2. Law enforcement requests witness relocation.
 3. Victims of hate crimes, including racial and ethnic harassment.
- Medical Hardship – will be granted only in cases of documented and verified medical need from a Doctor. The documentation must state that the medical need of the family cannot be met by remaining in the current housing situation.
- Change in functioning ability of the family – will be granted only with documentation from a Doctor, mental health worker, or the program manager showing that the functioning of the family or a member of the family is such that the needs of the family or the family member cannot be met in the Section 8 Program.
- Other approved reasons – will be determined on a case-by-case basis following a review by the requesting Section 8 program manager and the Public Housing program manager.

G. MITIGATING CIRCUMSTANCES FOR APPLICANTS/PARTICIPANTS WITH DISABILITIES

When applicants are denied placement on the waiting list, or MHA is terminating assistance, the family will be informed that presence of a disability may be considered as a mitigating circumstance during the informal review process.

Reason: This section sets forth the very important of transparency / connection between the programs if the best means to provide the reasonable accommodation at the time of request is in a program other than the one in which the applicant or participant initially applied to or was accepted in. The New Chapter 29 acknowledges this “portability” between programs as well. In view of the already approved careful language crafting this current provision, it is recommended to leave it in Chapter 15 but to cross reference Chapter 29.

MAJOR CHANGE No. 3 INTERIM RENT RE-EXAMINATIONS: Administrative Plan

Admin Plan: Add Language on Provision: C. Reporting Interim Changes, Section 14-5, “Decreases in Income”

Revise first Paragraph to Read:

Participants may report a decrease in income. ~~and other changes that would reduce the amount of tenant rent, such as an increase in allowances or deductions.~~ A change based on a change in family composition will also be conducted through an interim rent re-examination. If MHA determines there is a decrease in total income ~~or a change that would increase any allowance,~~ an appropriate adjustment to the family’s rent shall be effected. Residents must prepare the anticipated medical expenses and other deductions for the annual re-examination.

Decreases in the participants....”

Reason: The interim review process is designed to provide some rent burden relief to participants and residents between annual re-examinations. Typically, a decrease in income or family composition change that can affect the total tenant payment is reported to the MHA. After that change, it is the responsibility of the family to report any subsequent increase in income so that an adjustment to the total tenant payment calculation can be processed. At the annual re-examination, families, seniors, and disabled persons also report medical deductions that can affect the calculation. The federal guidance on this is very clear and that is ONLY ANTICIPATED expenses are considered. Of course, a family may use some prior expenses as a means of projecting the anticipated expenses...

Interim re-exams do have some discretion to tailor their interim, if in fact, they allow for them other than the mandatory interim changes. MHA has a history of taking changes, many very small, on an ongoing basis when the medical expenses that are not reimbursable, and which were not anticipated, are charged to the resident or participant.

This practice is administratively untenable given the shrinking federal funds for the program. The change would prohibit interims to consider changes in medical expenses or allowances not anticipated at the annual, which is the federal requirement.

Of course, MHA staff would do an educational outreach effort to participants and residents to develop and prepare families and seniors for their annual re-exams.

Changes to the Admissions and Continued Occupancy Policy: PH

Marin Housing Authority Low Rent Public Housing Admissions and Continued Occupancy Policy (ACOP)

Revision Keys:

- **Retain the Language as Is in the Admissions and Continued Occupancy is Shaded with Light Gray**
- **~~Strikethrough of Language Means it is Deleted from that Section in this Revision~~**
- **New Language Is Not Shaded and “Is in a Different Font” –**
- **To Facilitate Discussion between the Residents on the RAB and MHA, Reasons Are Provided for Each Major Change in Language**

MAJOR CHANGE No. 1 VAWA: ACOP

1. New Language: The following definitions have been added to the Glossary of Terminology located in the Admissions and Continued Occupancy Policy, at the re-numbered Chapter 19. These terms are added as are a result of the amendments to the 1937 Housing Act, which emanate from changes due to the passage of VAWA. The terms added are:

1. *Domestic Violence* is defined to include “felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction.

2. *Dating Violence* is defined to mean “violence committed by a person: A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and B) where the existence of such relationship shall be determined based on a consideration of the following factors: (I) The length of the relationship; (ii) the type of relationship; and (iii) the frequency of interaction between the persons involved in the relationship.”

3. *Stalking* is defined to mean: (A) (i) to follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate another person; or (ii) to place under surveillance with the intent to kill, injure, harass, or intimidate another person; and B) in the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to (i) that person; (ii) a member of the immediate family of that person; or (iii) the spouse or intimate partner of that person”; and

4. *Immediate family* is defined to mean, “with respect to a person: (A) a spouse, parent, brother or sister, or child of that person, or an individual to whom that person stands in loco parentis (in place of parents); or (B) any other person living in the household of that person and related to that person by blood or marriage.

1. Statement of Policies and Objectives

New Language: Section D. Fair Housing Policy, page 1-3

Add New Language to List of FHEO Acts:

- Violence against Women and Department of Justice Reauthorization Act of 2005.

2. Establishing Preference and Maintaining the Waiting List

New Language: Section D. Local Preferences, 1. Domestic Violence, page 2-5

- New Third paragraph: “The victim must provide a certification within 14 days of the request from the MHA that names the perpetrator, under a confidentiality agreement. It must be certified by a law enforcement, or self-certified with a neutral third party verification, as prescribed by HUD in its establishment of this requirement, and signed by the employee, agent, volunteer or other provider of social services, attorney, or medical professional.”
- Add Notation End of Section 1. “MHA has an ongoing and long-standing approach and commitment to the housing needs of victims of domestic violence. Where there is any conflict in the application of the “definition” of a victim of domestic violence between the established local preference, and the “domestic violence” definition added in the glossary pursuant to VAWA, the VAWA definitions for domestic violence supersede.”

3. Eligibility for Admission

New Language: Chapter 4, Section C. “Resident Selection Criteria,” page 4-3

General Principles (add a new principle to selection)

“MHA will not use as a basis for denial of admission that any applicant was the victim of domestic violence, dating violence, or stalking (“abuse”) if the applicant otherwise qualifies for admission or assistance (pursuant to Sec. 606 & 607 of VAWA 2005).”

5. Verification Procedures

New Language: Chapter 6 Section on “Split Households – Domestic Violence, page 6-23

New Language: Add to existing language in this section – “Verification of the status of a victim of domestic violence as defined under VAWA 2005 must consider and differentiate between the abuser and the victim, so as not to deny housing assistance to an applicant “victim” who otherwise qualifies for the housing.

6. Leasing

New Language: Chapter 8, Leasing- New Section M., Bifurcation of the Lease, page 8-7 (Retitle Section on Inspections N.)

New Language: “The MHA will bifurcate the lease of a resident family to protect the victim of domestic violence. The MHA will remove a household member from a lease under this section, without regard to whether a household member is a signatory to the lease, in order to evict, remove, terminate occupancy rights, or terminate assistance to any individual who is a tenant or

lawful occupant and who engages in criminal acts of physical violence against family members or others, without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is also a tenant or lawful occupant, and such eviction, removal, termination of assistance shall be effected in accordance with the procedures prescribed by federal, state, and local law for termination of leases under the relevant HUD-assisted program, in this case public housing. Certification of the abuse must be made within 14 of the request of the MHA in a form prescribed by HUD.”

7. Transfers

New Language: Chapter 11, Section H. Special Circumstances Transfer, page 11-4

New Language: “The family may transfer if a family “split” due to domestic violence has occurred and the transfer is requested to protect the health and safety of an individual who is the victim of the domestic or dating violence or stalking. The family transferring under this situation must have otherwise complied with all of the terms and obligations of their lease. HUD regulations implementing VAWA 2005 allow the prior lease to bifurcate to remove the abuser in the situation. The acceptable means of certification of the domestic violence, as prescribed by HUD, must be provided by the victim to the owner or MHA.”

8. Lease Terminations

New Language: Chapter 12, Add Section F. “ Terminations Due to Domestic Violence” (VAWA 2005), page 12-7

New Language: Criminal activity directly relating to abuse, engaged in by a member of a tenant’s household or any guest or other person under the tenant’s control shall not be cause for termination of tenancy or occupant rights if the tenant or an immediate member of the tenant’s family is the victim or threatened victim of that abuse. The ability to bifurcate the lease and take appropriate termination of tenancy or occupancy rights of the “abuser” is authorized by VAWA and granted to the MHA.

MAJOR CHANGE No. 2 REASONABLE ACCOMMODATION: ACOP

ACOP Chapter 1 (1-3 through 1-5)

E. Service and Accommodation Policy

(See Chapter 18 “NONDISCRIMINATION AND REASONABLE ACCOMMODATION POLICY AND PROCEDURES”)

It is the policy of MHA to provide courteous and efficient service to all applicants for housing assistance. In that regard MHA will endeavor to accommodate persons with disabilities, as well as those persons with language and literacy barriers.

This policy is applicable to all situations in this Admissions and Continued Occupancy Policy when a family initiates contact with MHA, when MHA initiates contact with a family (including when a family applies), and when MHA initiates schedules or reschedules appointments of any kind.

It is the policy of MHA to be service-directed in the administration of our housing programs, and to exercise and demonstrate a high level of professionalism while providing housing services to the families within our jurisdiction.

MHA policies and practices will be designed to provide assurances that all persons with disabilities will be provided reasonable accommodation so that they may fully access and utilize the housing program and related services. The availability of specific accommodations will be made known by including notices on MHA forms and letters to all families, and all requests will be verified so that MHA can properly accommodate the need presented by the disability.

Federal Americans with Disabilities Act of 1990

Title II extends Section 504's prohibitions on discrimination against persons with disabilities to the programs, activities, and services operated by MHA. Title II contains specific physical accessibility requirements that apply to common areas and public spaces as well as the individual housing units. (28CFR Part 151; 28 CFR Part 35, 28 CFR Part 36)

The 1990 Act means: (24 CFR 8.3) Section 504 definitions of Individual with Disabilities and Qualified Individuals with Disabilities may be a person who has:

["LISTING OF DEFINITIONS (a) through (l)"]

Health Insurance Portability and Accountability Act (HIPAA of 1996).

When verifying disability information, MHA shall keep in mind the privacy requirements under the Health Insurance Portability and Accountability Act (HIPAA of 1996). HIPAA requires that patients sign a specific authorization before a covered entity can release their medical information to a third party for purposes not related to the patient's health care. (See Chapters 4-5 and Chapters 6-21.)

Reason: Retain this language in the General Statement and Objectives Section of Chapter 1 to make the general statement of service to this community and point to the New Chapter on "Reasonable Accommodation." The definitions are left to simply define the federal "fundamental" definitions and help introduce the new chapter. Lastly, the HIPAA information on release of information provides for the general privacy acknowledgements. Therein, the reference to Chapters 4-5 and Chapters 6-21 are also left unaltered.

Undue Hardship page 1-5

~~Requests for reasonable accommodation from persons with disabilities will be granted upon verification that they meet the need presented by the disability and the accommodations do not create an "undue financial and administrative burden" for MHA, meaning an action requiring "significant difficulty or expense."~~

~~In determining whether an accommodation would create an undue hardship, the following guidelines will be considered:~~

~~_____ The nature and cost of the accommodation needed;~~

~~_____ The overall financial resources of the facility or facilities involved in the provision of the accommodation; and~~

~~_____ The number of persons employed at such facility, the number of families likely to need such accommodation, the effect on expenses and resources, or the likely impact on the operation of the facility as a result of the accommodation.~~

New Language in Chapter 18: Exhibit 18 C. A. 3, page 16

- e. Acceptance. Upon receipt of the 504 RA36, Certification Of Need for Reasonable Accommodation, confirming that the individual is a person with disabilities and the accommodation requested is related to his/her disability and is needed to enable him/her to have equal access the program, the MHA will determine if the requested accommodation is reasonable. An accommodation is not reasonable if it would constitute a direct threat to the health and safety of other individuals; result in substantial physical damage to the property of others; require changes, adjustments, or modifications to existing programs that would be substantial; result in a fundamental alteration of the program; *or an undue administrative or financial burden if granted.* [emphasis added] If the request is determined to be reasonable, the MHA will send the applicant or resident/participant a Reasonable Accommodation Approval Notice (Form S504-04).

Reason: The goal is to move all elements that don't relate specifically to calculations into one location in the Admissions and Continued Occupancy Plan. The thrust of this section is to indicate that the MHA cannot take onto itself a responsibility requiring a significant change to the budget and other administrative considerations. For example, MHA cannot build an elevator in a two story townhouse where the structural nature of the unit, the funds available in the capital or operating fund, or other considerations make this an unworkable solution. MHA must make the most focused consideration for the specific accommodation that has been requested and supported with certifications.

Reasonable Accommodation page 1-6

~~A "reasonable accommodation" is a change, exception, or adjustment to a rule, policy, practice, or service that may be necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces. To show that a requested accommodation may be necessary, there should be an identifiable relationship between the requested accommodation and the individual's disability. An accommodation will not be considered reasonable if it constitutes a fundamental alteration of the program or constitutes an undue financial and administrative burden to the agency.~~

~~Reasonable accommodation will be made for persons with a disability who require an advocate or accessible offices. A designee will be allowed to provide some information, but only with the permission of the person with the disability. All MHA mailings will be made available in an accessible format upon request, as a reasonable accommodation.~~

New Language in Chapter 18, Definitions III, A., page 4:

A. Reasonable Accommodation. A reasonable accommodation is a change, exception or adjustment that the MHA can make to its rules, policy, practices, and procedures or to its housing units that will provide an otherwise eligible family with a disability an equal opportunity to participate in and benefit from the programs administered by the MHA. There must be an identifiable relationship between a requested accommodation and an individual's disability. The Notice(s) of Non-Discrimination and Reasonable Accommodations include examples of reasonable accommodations that may be requested from the MHA or that private owners may permit Section 8 participants to make. (See Notices, Exhibit 18: 1A.)

Reason: The goal is to move all elements that don't relate specifically to calculations into one location in the Admissions and Continued Occupancy Plan. This is the basic definition of reasonable accommodation and is developed and supported throughout this new Chapter 18.

This new language provides the maximum consideration of any potential request and the standard to which the request is verified.

Verification of a Request for Accommodation page 1-6

~~Requests for reasonable accommodation from persons with disabilities will be granted upon verification that they meet the need presented by the disability, and do not create an undue burden for MHA. All requests for accommodation or modification of a unit will be verified with a reliable, knowledgeable, and professional.~~

New Language in Chapter 18, IV. Determining Need, A-C, p. 6:

IV. DETERMINING NEED

- A. An applicant or resident/participant identifies the need for a particular reasonable accommodation for a family member with a disability by completing the Special Requirement(s) Questionnaire. (See Exhibit 18: 1C). This form is included in application and income 504-RA examination packets. An applicant or resident/participant may request the form from MHA staff and submit it at any other time as needed.

After the need for a modification to a unit or an adjustment to MHA policies or procedures is identified and confirmed, the MHA will respond in accordance with the procedure outlined in Exhibit 18: 1C.

- B. An applicant or resident/participant who requires a reasonable accommodation as outlined in Exhibit 18: 1C may request it at any time during the application process or after admission to a program.
- C. The need for the particular accommodation requested by the participant shall be confirmed by a medical or mental health care provider, such as: a licensed physician, physical therapist, psychiatrist, or counselor. Confirmation will also be accepted from other service providers such as: a social worker, caseworker or counselor from a government or non-profit agency. Certification may be provided on the Certification of Need for Reasonable Accommodations (504-RA36 form) or other appropriate documentation (such as a letter to the MHA from one of the providers listed above on his/her letterhead) which identifies: 1) the individual as a person with disabilities, 2) the accommodation requested, and 3) how each accommodation requested is related to and necessary due to the individual's disability.

Reason: The goal is to move all elements that don't relate specifically to calculations into one location in the Admissions and Continued Occupancy Plan. This is the main part of this Chapter on "Determination of Need." The forms that implement the procedures are included in the Chapter and can be used [like all elements] whether for the Section 8 or Public Housing programs. The issue of "undue hardship" has been addressed in a previous section.

Application Process page 1-6

For purposes of this section, MHA will make the following types of accommodations to persons with disabilities to facilitate the application process:

- ~~Permitting the submission of applications or certification forms via mail.~~
- ~~Permitting an authorized designee to participate in the application or certification process, with written authorization from the applicant.~~
- ~~Providing assisted listening devices to facilitate the application or certification process.~~

New Language in Chapter 18, Special Requirements Questionnaire, p. 34:

Examples of accommodations you may request include, but are not limited to: documents provided in large print, wheelchair-accessible facilities, space to accommodate a service animal or medical equipment, a live-in aide, modifications to a housing-authority owned rental unit, accessible computer hardware and/or software for instruction, sign language interpreters, assisted listening devices, or other auxiliary aids and/or services.

Reason: The goal is to move all elements that don't relate specifically to calculations into one location in the Admissions and Continued Occupancy Plan. The program accessibility is set forth in policy and procedure. The clearest and straightest connection in this regard is that a questionnaire form asking applicants or participants what specific accommodation they might need. Again, this form will be in effect for Section 8 and Public Housing.

Recertification by Mail page 1-7

~~MHA will permit the family to submit annual and interim recertification forms through the mail when MHA has determined that the request is necessary as a reasonable accommodation.~~

~~The mail-in packet will include notice to the family of MHA's deadline for returning the completed forms to MHA.~~

~~If there is more than one adult member in the household, but only one is disabled, recertifications may not be processed through the mail. In such cases, the able adult family members may be required to come in for the appointment, but will be allowed to take the necessary forms home to the member with a disability for completion and signature.~~

New Language in Chapter 18, I. D., page 26:

1. Interview Process-All Programs.

Upon request, the MHA may provide reasonable accommodations to an applicant or resident/participant family with a member with disabilities. For applicant families, such requests are not subject to verification for the initial interview. Examples of such accommodations include but are not limited to:

a. If a person with disabilities is unable to come to the office due to a disability, a MHA staff member may:

- (1) Schedule the interview to accommodate the family's needs;*

- (2) *Conduct the interview by phone and mail the documents to the family for signature(s); or*
- (3) *Schedule a home visit. [emphasis added]*

Reason: The goal is to move all elements that don't relate specifically to calculations into one location in the Admissions and Continued Occupancy Plan. All manner or degree of reasonable accommodation is made through this chapter. The interview and participation requests are to be seen as equally compelling on MHA staff to respond appropriately.

Home Visits page 1-7

~~When requested and where the need for reasonable accommodation has been established, MHA will conduct home visits to residents to conduct annual and interim recertifications.~~

~~Requests for home visit recertifications must be received by MHA at least 5 days before the scheduled appointment date in order for the request to be considered.~~

~~MHA will consider home visit recertifications that are requested after the scheduled appointment has been missed, provided the request is timely.~~

New Language in Chapter 18, I A. 3., page 22:

3. Requests for Reasonable Accommodation

- a. Special Requirements Questionnaire (Form 504 RA1). When an applicant or participant/resident wishes to request an accommodation, staff shall will supply the 504 RA1 form. The applicant or participant/resident shall complete the 504 RA1 on the behalf of a family member with disabilities. At the client's request, MHA staff may assist the client in completing the form.

Reason: The goal is to move all elements that don't relate specifically to calculations into one location in the Admissions and Continued Occupancy Plan. The Special Requirements Questionnaire is the method to request whatever the specific accommodation a person might need from MHA staff.

Other Accommodations page 1-7

~~MHA has referrals to organizations that provide assistance for hearing and sight-impaired persons when needed.~~

~~MHA will refer families who have persons with disabilities to agencies in the community that offer services to persons with disabilities where necessary.~~

New Language in Chapter 18, I, C., page 15-16:

3. Social Service Programs

Individuals who request social services are interviewed to determine eligibility and assess the individual's interest and develop a vocational plan, including supportive services, such as transportation assistance, childcare, tools, clothing and referral to specialized services such as medical assistance, domestic violence, drug counseling, etc. *Supportive services and referrals are available to individuals with and without disabilities. Accommodation may be requested at the initial interview or at any time during the period that services are being provided to the individual. Staff will explain the procedure to request reasonable accommodation and provide the necessary forms as cited in Section 1, 18:1C. Forms will be provided in an alternative format as needed. [Emphasis added]*

Reason: The goal is to move all elements that don't relate specifically to calculations into one location in the Admissions and Continued Occupancy Plan. The Special Requirements Questionnaire is the method to request whatever the specific accommodation a person might need from MHA staff. Staff will aid and assist in a manner to achieve the most fair and reasonable accommodation possible for the family member with a disability.

ACOP Chapter 2 (2-9 Section H. 2)

2. Handicapped Equipped Units

~~MHA has units designed for persons with mobility, sight, and hearing impairments, referred to as accessible units.~~

~~No non-mobility impaired families will be offered these units until all eligible mobility-impaired applicants have been considered.~~

~~Before offering a vacant accessible unit to a non-disabled applicant, MHA will offer such units:~~

~~First, to a current occupant of another unit of the same development, or other public housing developments under MHA's control, who has a disability that requires the special features of the vacant unit.~~

~~Second, to an eligible qualified applicant on the waiting list having a disability that requires the special features of the vacant unit.~~

~~When offering an accessible/adaptable unit to a non-disabled applicant, MHA will require the applicant to agree to move to an available non-accessible unit within 30 days when either a current resident or an applicant needs the features of the unit and there is another unit available for the applicant. This requirement will be a provision of the lease agreement.~~

~~MHA will made modifications to the unit in keeping with the Section 504 Transition Plan as the need arises and until the agency determines that an adequate number of units have been rehabilitated in numbers sufficient to evidence compliance with the Plan. After such point in time, the PHA may approve the family's plan to make physical modifications at the family's~~

~~expense and consistent with the terms of the Authority's 504 Plan as it relates to tenant modifications.~~

New Language in Chapter 18, F.1-5, pages 17-20:

F. Availability of Accessible Units/Units with Accessibility Features

1. MHA-Owned Units

Staff offers available accessible units or units with accessibility features to qualified applicants and residents who have requested and have verified a disability-related need for those units. Priority is determined as follows:

- a. A current resident family with a member with disabilities living at the same site;
- b. A current resident family with a member with disabilities who lives at other sites;
and
- c. An applicant family with a member with disabilities who needs the accessibility features.
- d. If there are no resident or applicant families with a member with disabilities interested or available, then the unit may be leased to an applicant or resident without a disability. The lease for all residents will include a provision requiring the resident family with no member with disabilities to transfer to a non-accessible unit if a family with a member with disabilities subsequently requires the accessible unit.

2. Transfers: MHA-Owned Units

Transfers are defined by the MHA's Admission and Continued Occupancy Policy (ACOP). An emergency transfer relating to a reasonable accommodation request is a transfer determined by the Authority as required to alleviate a doctor-verified medical condition which is imminently life-threatening or seriously impairs the health of the Resident or a Household Member (i.e. lead poisoning or amputation). All other transfers for an approved reasonable accommodation request are considered a routine transfer, as defined in the ACOP. (See both the ACOP Public Housing and Senior Policy Sections.)

- a. If it has been determined that a resident family with a member with disabilities has a need for a reasonable accommodation, but the resident's current unit cannot be reasonably modified, the resident will be offered a transfer to a suitable unit within the development in which the resident resides. A suitable unit is one that is the appropriate bedroom size and provides the reasonable accommodation, or can be modified to provide the reasonable accommodation requested by the resident family.
- b. If a suitable unit that meets the needs of the resident family with a member with disabilities is not available in the development where the resident resides, the resident will be offered a suitable unit within the developments managed by the Housing Division.

- c. If a suitable unit that provides the reasonable accommodation is not available in the developments managed by the Housing Division, the resident shall be placed on a waiting list and will be offered the next available suitable unit at any of the developments.
 - d. If a resident's need for the accommodation is deemed an emergency under the MHA's Admission and Continued Occupancy Policy, Section on Transfers and cannot be met in a reasonable period of time by the Housing Division, with the approval of the Housing Services Manager with the concurrence of the Accessibility Coordinator and the Section 8 Manager, the resident may be offered Section 8 assistance.
 - e. Accessible units that are leased to residents who do not have a family member with a disability must be offered to qualified applicants or residents with a family member with disabilities who requires the features of the unit. In accordance with the resident's lease, the non-disabled resident family must be transferred (as an involuntary transfer) at the Authority's expense:
 - (1) To a comparable unit within the development, or,
 - (2) If no comparable unit is available at the resident's current development, the resident must be offered a unit at another MHA development.
 - (3) If the resident does not move from the accessible unit within a reasonable amount of time after being requested to transfer, and offered a suitable unit, the MHA may terminate the lease.
 - (4) If a family with no member with disabilities moves into an accessible unit and later claims and can verify a disability for a family member and a disability-related need for the unit's accessibility features, then the resident family would not be required to transfer.
3. Offers of Accessible Units. A Record of Offer for Wheelchair Accessible Units, Form S504-02, shall be completed by staff for each offer extended to applicants or residents of the MHA-owned wheelchair accessible units.

Copies of the completed form S504-02 shall be forwarded to the office of the Accessibility Coordinator, as well as being placed in the applicant/resident file.

4. Accessible Unit Inventory. The Housing Division will maintain an updated inventory of units which are fully accessible or which have one or more accessibility features. The inventory shall show units by housing development, unit, bedroom size and type of features available.

Until the inventory can be incorporated in MHA's computer business system, information will be provided to the Housing Manager each time a modification is made as a result of maintenance, contract work, or modernization activity. The Maintenance Supervisor at the site will also keep an updated listing of each 504 accommodation modification.

In addition, Housing management and/or maintenance staff will document accessibility features when they conduct their annual, special maintenance or special inspections of any Authority-owned units.

Inventories will be used as the resource for planning to meet the accommodation when an applicant family requests either a fully accessible unit or a unit with accessibility features.

5. Section 8 Program Participants. The Section 8 Program solicits and maintains a list of available rental units that includes properties with accessibility features available to meet the needs of persons with disabilities. Applicant or participant families which include a person with a disability are provided with the listing of properties which owners have described as accessible at the time of briefing. Updated listings are available weekly from the Section 8 Division.

Reason: The goal is to move all elements that don't relate specifically to calculations into one location in the Admissions and Continued Occupancy Plan. The section for the use of the existing inventory is important. It is the resource that MHA has to offer the public. This policy and procedure, and the accompanying forms should make the process of putting the proper families into accessible units are covered here.

ACOP Chapter 5 (5-4 Section E.)

E. ACCESSIBLE UNITS page 5-4

~~MHA has units designed for persons with mobility impairments. These units were designed and constructed specifically to meet the needs of persons requiring the use of wheelchairs and persons requiring other physical modifications. Preference for occupancy of these units will be given to families with disabled family members who require the modifications or facilities provided in the units.~~

~~No non-mobility impaired families will be offered these units until all eligible mobility-impaired applicants have been considered, as long as a mobility-impaired applicant can be found.~~

~~Accessible units will be offered and accepted by non-mobility impaired applicants only with the understanding that such applicants must accept a transfer to a non-accessible unit at a later date if a person with a mobility impairment requiring the unit applies for housing and is determined eligible. MHA requires that the applicant agree to move within 30 days. This requirement is a provision of the lease, and eviction can result if the family refuses to move.~~

New Language in Chapter 18 F.1-5, pages 17-20:

Refer to the previous section. The lease will be reviewed to insure that existing language support this reasonable accommodation; if not then the lease language will be revised.

(Chapter 11 – Transfers) page 11-1

- **Reasonable Accommodation:** Those transfers that are made when a resident needs to move to a different unit as an accommodation to a resident's disability.

Refer to the previous section. The lease will be reviewed to insure that existing language support this reasonable accommodation; if not then the lease language will be revised.

K. NON-DISABLED RESIDENTS IN ACCESSIBLE UNITS page 11-5

Non-disabled residents residing in designated accessible units shall be required to relocate to a non-accessible unit of suitable size with a 30-day notice to so relocate. Failure to relocate to the specified unit shall be a material breach of the lease and may subject the resident to eviction action in compliance with the lease restrictions.

Refer to the previous section. The lease will be reviewed to insure that existing language support this reasonable accommodation; if not then the lease language will be revised.

(Chapter 13 – Complaints, Grievances and Appeals)

Reasonable Accommodation in the Grievance Procedure, page 13-9

MHA will provide reasonable accommodation for a person with disabilities throughout the grievance process. This includes, but is not limited to, accommodating residents with disabilities by accepting grievances by mail or having MHA staff reduce an oral request to writing, providing qualified sign language interpreters, readers, and/or accessible locations.

New Language in Chapter 18, Exhibit 18 1D, I-II, pages 49-52:

I. DISABILITY-RELATED INQUIRIES AND GRIEVANCES

This section sets forth the internal procedure for resolution of inquiries and grievances alleging any action prohibited by State and Federal fair housing laws. Whenever possible, the MHA staff shall respond to and resolve disability-related inquiries informally and at the lowest level possible.

- A. Inquiry Procedure. MHA staff shall attempt to resolve any disability-related inquiries received by ensuring that they have followed the Non-discrimination and Reasonable Accommodation Policy ("Policy").
1. If the inquiry cannot be resolved by following the Policy, staff shall consult their supervisor. If an inquiry is complex or cannot be resolved at the supervisor level, managers shall either resolve the inquiry or forward the inquiry and the facts of the case to the 504 Coordinator and/or Executive Director for a determination.
 2. If an inquiry is called into the 504 telephone line, the Accessibility Coordinator's staff will refer the inquiry to appropriate staff to handle. After compiling the facts, staff will take the necessary action and notify the Accessibility Coordinator of the resolution. In complex cases, staff may consult with the Executive Director.
 3. At the discretion of the Division Manager, a complex inquiry may be sent to the Accessibility Coordinator for review. The Accessibility Coordinator shall review the

inquiry in relation to Fair Housing laws and applicable regulations, the MHA's Policy and the Administrative Plan. After consultation with the Manager and appropriate staff, the Accessibility Coordinator shall render a determination. The Manager shall then direct staff to take appropriate action to resolve the situation.

4. Each MHA Division shall respond to an inquiry in a timely manner. In most cases, a resolution will be reached within 30 calendar days of the receipt of the inquiry. If additional information is needed, the applicant or resident/participant will be expected to respond within 10 days of the receipt of the request. Upon receipt of the necessary information, the Manager will respond within 30 calendar days, barring extenuating circumstances. In cases of delay, the Division will notify the grievant in writing why additional time is needed to respond to the inquiry.

B. IF A INQUIRY IS NOT RESOLVED INFORMALLY

If a family with a member with disabilities does not agree with the action of the MHA to resolve its inquiry informally, the participant may choose to make a grievance on Form S504-09, which will be processed in accordance with the grievance procedures. (See 18:1D, Section II; 24 CFR 8.53(b)). In cases where the client requests or requires assistance, MHA staff will assist the client in completing the form.

II. DISABILITY-RELATED GRIEVANCE

A. Grievance

1. If a family with a member with a disability believes it has been denied equal opportunity to participate or benefit from any of the MHA programs due to disability, a grievance may be submitted to the Accessibility Coordinator.
2. The grievant shall use the Disability-Related Grievance Form S504-09 and may submit any written information that the grievant believes to be relevant to their grievance. The Accessibility Coordinator, or designee, will explain the grievance process and how to complete the form. If the client requests or requires assistance, staff will assist him or her to complete the form. The Accessibility Coordinator will explain that the grievant may also submit any information in written or electronic form that the grievant believes to be relevant to the grievance.

B. Preliminary Review.

1. The Accessibility Coordinator will review the grievance and all information submitted. The Accessibility Coordinator will then determine:
 - a. If the grievance is an issue related to program accessibility due to disability (e.g., related to a barrier to accessibility or discrimination based on a disability) for matters which fall within the Accessibility Coordinator's responsibility, a preliminary review of the matter will be conducted.
 - b. If the matter is a personnel issue that should be referred to the MHA Human Resources staff; or if the matter does not fall under the 504 Accessibility Coordinator's jurisdiction, the grievant will be notified in writing of the disposition of their grievance.

C. Investigation.

1. If the results of the preliminary review identify a prompt and equitable resolution to the disability-related grievance, then the investigation process will be discontinued. The Accessibility Coordinator will direct staff to take the actions necessary to resolve the grievance and prepare a memo to the file to document the resolution.
2. If after the preliminary review it is determined that an investigation is warranted, then the Accessibility Coordinator, or his/her designee, will conduct the investigation of the grievance. The investigation process shall be informal and thorough, including:
 - a. Meeting(s) with grievant and other interested persons; and
 - b. Providing an opportunity for the grievant and other interested parties to submit relevant evidence related to any barriers to accessibility, including program errors, physical structures, and procedures.
 - c. An evaluation of the facts.
 - d. A written discussion of the findings relative to the grievance, including:
 - (1) Statement of the grievance;
 - (2) Statement of the evidence;
 - (3) Finding(s); and
 - (4) Plan of resolution, where warranted.

D. Determination

1. General

- a. The Accessibility Coordinator shall prepare a written determination as to the validity of the grievance and a description of the plan of resolution. The Accessibility Coordinator shall consider all factual information, the totality of the circumstances, the nature of the alleged discriminatory conduct and the context in which the alleged incident(s) occurred in making his/her determination.
- b. The written determination shall include:
 - (1) A determination as to whether the alleged conduct constitutes discrimination, a programmatic error, or proper action on the part of the MHA.
 - (2) The plan of resolution, where warranted, will include:
 - (a) Directives to staff covering the correction action to be taken, including dates of completion.
 - (b) Reasonable steps to protect the grievant from discrimination.

- (c) Reasonable steps to protect the grievant from retaliation as a result of making the grievance.
- (d) If it is determined that discrimination occurred, swift and appropriate disciplinary action commensurate with the severity and/or frequency of the offense.

The Accessibility Coordinator may consult a third party group to assist in the review of a denial or formulation of a reasonable accommodation.

A copy of the determination shall be forwarded to the grievant, the respective Division and the MHA’s general counsel.

In most cases, a determination will be made within 30 calendar days. If additional information is needed, the grievant will be expected to respond in a reasonable period of time. Once provided with the necessary information, the Accessibility Coordinator will respond within 30 calendar days, barring extenuating circumstances. In cases of delay, the Accessibility Coordinator will notify the grievant in writing why additional time is needed to respond to the grievance.

Reason: The goal is to move all elements that don’t relate specifically to calculations into one location in the Admissions and Continued Occupancy Plan. This section of the New Policy and Procedure goes a greater distance to make sure that all disputes or grievances are handled properly. The Chapter also provides the underlying most important aspects of this change in Policy and procedure. The first is that these changes put in place uniform approaches in Section 8 and Public Housing with the procedures and forms to implement a sound and fair “504” Policy. Second, the naming of a neutral but internal party to adjudicate any disputes lends impartiality and fairness to the existing practices.

MAJOR CHANGE No. 3 INTERIM RENT RE-EXAMINATIONS: ACOP

ACOP: Add Language on Provision: C. Interim Rent and Family Composition Adjustments- Chapter 10-Page 10-5 & 10-6

*Add to First Paragraph of Section C. **after** the first sentence in the first Paragraph*

“The MHA will make the interim reexamination within a reasonable time after the family request. The MHA will adopt policies prescribing when and under what conditions the family must report a change in family income or composition. CFR
960.257”

*Add to Second Paragraph **after** – “The family...to the household.”*

“Any postponed changes will be included at the next interim requested by the tenant due to a loss in income or at the next annual re-exam. No interim rent decrease will be made when the tenant has not cooperated with the annual re-exam. During an interim reexamination, only the information affected by the changes being reported will be reviewed and verified.”
Local Determination

** Add to Section Numbered 2. **at beginning of First Sentence- “All sources and changes...”***

“Between annual reexaminations, if there are changes in a family’s income, or household composition an interim reexamination may be conducted.

Add to Section Numbered 3. Decrease in Income and Rent Adjustments as a Revised First Paragraph of Number 3.

“Residents may report a decrease in income ~~and other changes, such as an increase in allowances or deductions that would reduce the amount of the total tenant payment.~~ The only other interim rent adjustment will be for the reported changes in family composition. In order to qualify for rent reductions, residents must report the decrease promptly within 10 days of notification of the decrease or change in family composition. The decrease must be of at least a 30-day duration. Residents must prepare the anticipated medical expenses and other deductions for the annual re-examination as no interim changes will be made for items not anticipated at the annual for a deduction. “

Families choosing flat rent payment option may report a change at the interim examination if: a.)

A financial hardship situation has occurred as defined in Section N. of Chapter 7, page 7-19.b.) If a household chooses to change from the flat rent option to adjusted income rent calculation, the household may not return to flat rent until the next regular reexamination date for that development.

Add to Number 6- Other Interim Issues – Chapter 10, Page 10-7after the last sentence...Chapter 7.”.

1.) Change in Earnings Exclusion (Earned Income Disregard): An interim reexamination must be conducted when the percentage of incremental earnings to be excluded changes from 100% to 50% after 12 months, and when the 50% disregard ends after 24 months. Chapter 7, 7-11. 960.255

2.) MHA Error:

a.) When an error is made by the MHA at admission or reexamination, the tenant is encouraged to report the error to the PHA as soon as they become aware of it so an interim reexamination can be conducted.

b.) No retroactive rent increase will be made against the family when the the PHA has made an error.

Reason: The interim review process is designed to provide some rent burden relief to participants and residents between annual re-examinations. Typically, a decrease in income or family composition change that can affect the total tenant payment is reported to the MHA. After that change, it is the responsibility of the family to report any subsequent increase in income so that an adjustment to the total tenant payment calculation can be processed. At the annual re-examination, families, seniors, and disabled persons also report medical deductions that can affect the calculation. The federal guidance on this is very clear and that is ONLY ANTICIPATED expenses are considered. Of course, a family may use some prior expenses as a means of projecting the anticipated expenses.

Interim re-exams do have some discretion to tailor their interim, if in fact, they allow for them other than the mandatory interim changes. MHA has a history of taking changes, many very small, on an ongoing basis when the medical expenses that are not reimbursable, and which were not anticipated, are charged to the resident or participant.

This practice is administratively untenable given the shrinking federal funds for the program. The change would prohibit interims to consider changes in medical expenses or allowances not anticipated at the annual, which is the federal requirement.

Of course, MHA staff would do an educational outreach effort to participants and residents to develop and prepare families and seniors for their annual re-exams.

SECTION 8 HOME OWNERSHIP ASSISTANCE PROGRAM

The Home Ownership Assistance Program will open opportunities for some Section 8 voucher recipients to purchase a home using Section 8 housing assistance payments. Prior to the finalization of this policy, MHA staff met with Fannie Mae and various lenders in the county to formulate a program that would work in Marin County. Fannie Mae has developed a new lending program that is directed at homeownership and two lending agencies in Marin County will work with MHA to establish this program. The program was reviewed by the RAB and approved. Even though only a small number of participants are able to utilize this program, it is one way that low-income Marin County residents can own a home.

CHAPTER 25 Section 8 Administrative Plan SECTION 8 HOME OWNERSHIP

INTRODUCTION

The Section 8 Home Ownership Program of the Housing Authority of the County of Marin (MHA) permits eligible participants who are in the Section 8 Housing Choice Voucher Program the option of purchasing a home with their Section 8 assistance rather than renting. The home ownership option is limited to 1% of the total Voucher Program allocation in any calendar year. This limit does not apply to disabled families. If applications exceed the 1% of the total Voucher Program allocation per year, participants in the Family Self-Sufficiency (FSS) program shall receive a priority for participation in the Home Ownership Program.

Eligible applicants for the Section 8 Home Ownership Program must have been on the program for one full year. They may not owe MHA or any other Housing Authority any money.

Section 8 home ownership assistance may be used to purchase the following type of homes: new or existing single-family units, condominiums, planned use developments, cooperatives, live/work units, mobile homes or manufactured homes. MHA will permit portability of the Section 8 home ownership assistance to another jurisdiction, provided the receiving jurisdiction operates a Section 8 Home Ownership Program for which the Section 8 home ownership applicant qualifies.

A. FAMILY ELIGIBILITY REQUIREMENTS

Participation in the Section 8 Home Ownership Program is voluntary. Each participant must:

1. Have met the general requirements for admission to the Section 8 Housing Choice Voucher Program and
2. Be in good standing within the Section 8 Housing Choice Voucher Program, and
3. Have fully repaid any outstanding debt owed to MHA or any other Housing Authority, and
4. Have been on the Section 8 Housing Choice Voucher Program for one year, and
5. Be a first-time homeowner or have a member of the household who is a person with disabilities, and
6. Not have any member of the household who has a present ownership interest in a residence at the commencement of the ownership assistance, and
7. Meet the requisite employment criteria, with the exception of elderly and disabled households, and
8. Not defaulted on a mortgage securing debt to purchase a home under any home ownership option.

B. CLARIFICATION OF ELIGIBILITY REQUIREMENTS

First time homeowner – A first-time homeowner means that no member of the household has had an ownership interest in any residence during the three years preceding commencement of home ownership assistance. However, a single parent who, while married, owned a home with a prior spouse is considered a first-time homeowner for purposes of the Section 8 Home Ownership Program. The right to purchase title to a residence under a lease-purchase agreement is not considered an ownership interest.

Minimum income requirement – At the time the family begins receiving homeownership assistance, the head of household, spouse, and/or other adult household members who will own the home must have a gross annual income at the time of the application of twice the current payment standard for the Voucher that they hold. With the exception of elderly and disabled families, welfare assistance income will be disregarded. Types of income that are accepted are:

- SSI
- TANF
- General Assistance
- Other welfare assistance specified by HUD

Employment History – With the exception of disabled and elderly households, each family must demonstrate that one or more adult members of the family who will own the home at the commencement of home ownership assistance is employed full-time (an average of not less than 30 hours per week) and has been so continuously employed for one year prior to execution of the sales agreement.

Completion of Initial Lease Term – A period of not less than 12 months continual eligibility under the Section 8 Program must have been completed. Applicants for Section 8 and new participants are not eligible to apply for or participate in the Section 8 Home Ownership Program.

Repayment of any Housing Authority Debt – Participants in the Section 8 Housing Choice Voucher Program shall be ineligible for participation in the Section 8 Home Ownership Program if any debt or portion of a debt remains owed to MHA or any other Housing Authority.

Additional Eligibility Factors

Elderly and Disabled Households – are exempt from the employment requirement. In the case of an elderly or disabled household MHA will consider income from all sources, including welfare assistance in evaluating whether the household meets the minimum income required to purchase a home through the Section 8 Home Ownership Program.

Preference for Participation in FSS Program – applicants for the Section 8 Home Ownership Program are not required to participate in the MHA's FSS program. However, in the event the applications for ownership assistance exceed 1% of MHA's total voucher program in any fiscal year, FSS participation shall have a preference.

Have 3% of the purchase price for the down payment and at least 1% of purchase price comes from family's personal resources.

C. FAMILY PARTICIPATION REQUIREMENTS

Once a family is determined to be eligible to participate in the Section 8 Home Ownership Program, they must comply with the following requirement:

Home Ownership Counseling Program. - A family's participation is conditioned on the family attending and successfully completing a home ownership and housing counseling program approved by MHA prior to the beginning of the home ownership assistance.

Home Ownership Eligibility Interview - Prior to the actual purchase of the home, the family must meet with MHA staff for an interview. This interview will consist of a review of the financial ability of the family to purchase a home. This will include proof of the ability to secure 10% of the expected purchase price of the home which will be used for the down payment and closing costs of the home. The family will receive an approved price guideline for the location of a home. (See attachment C).

D. LOCATING A HOME

Upon approval by MHA that the family is eligible for the Homeownership Program, they will have 180 days to locate a home to purchase. A home shall be considered purchased following the escrow closing. For good cause, MHA may extend the time limit for the family to locate a home in additional 30-day increments.

If a participant family is unable to locate a home within the time approved by MHA, their Section 8 rental assistance through the Section 8 Housing Choice Voucher Program will continue on a rental unit.

E. TYPE OF ELIGIBLE HOME

- A new or existing home
- A single-family home
- A condominium
- A home in a planned use development
- A cooperative
- A loft
- A live/work unit
- A manufactured home
- Townhouse
- Mobile Home & Pad
- Floating Home and Berth

The home must already exist or be under construction and scheduled for completion prior to the expiration of the 180 day search time.

F. PURCHASING A HOME OUTSIDE OF MHA'S JURISDICTION

The family may purchase a home in a jurisdiction other than MHA's provided the receiving jurisdiction operates a Section 8 Home Ownership Program and that the family meets the qualification for participation in the receiving jurisdiction's Section 8 Home Ownership Program.

G. PURCHASING A HOME

Once a home is located and a sales agreement is approved by MHA and signed by the family, the family shall have up to three months to finalize the purchase of the home. In the case of a documented hardship the family may request an extension of this requirement.

If the family is unable to purchase the home, the family shall continue their participation on the Section 8 Housing Choice Voucher Program.

H. LEASE-PURCHASE

A family may enter into a lease-purchase agreement while receiving assistance under the Section 8 Housing Choice Voucher Program. All requirements of the Section 8 Housing Choice Voucher Program apply to the lease-purchase agreement, except that the family may pay an extra amount out of pocket to the owner for a home ownership premium. A home ownership premium is defined as an increment of value attributable to the value of the lease-purchase right or agreement.

I. SALES AGREEMENT

Once the family has located a funding agent they should submit the proposed terms to MHA for a final approval of the financing terms. The family must be provided a copy of these terms to MHA. The sales agreement must provide for the following:

- Inspections by MHA which state that the purchaser is not obligated to purchase unless this inspection is completed to the satisfaction of MHA.
- That the purchaser is not obligated to pay for any necessary repairs without approval by MHA.
- That the purchaser is not obligated to purchase if the mortgage financing terms are not approved by MHA.
- MHA checks to insure that the seller is not debarred, suspended, or subject to a limited denial of participation under 24 CFR part 24.

J. INDEPENDENT INITIAL INSPECTION

To assure the home complies with the housing quality standards of the Section 8 program an inspection of the proposed home must be conducted by the Section 8 inspector to insure that it meets housing quality standards. If the home is approved by the Section 8 inspector it will also be necessary to have an independent inspection of existing homes covering major building systems completed by a professional selected by the family and approved by MHA. MHA does not pay for the independent inspection. The independent inspection report must be provided to MHA who may disapprove the unit due to information contained in the report or for failure to meet federal housing quality standards.

K. FINANCING REQUIREMENTS

The proposed financing terms must be submitted to and approved by MHA prior to close of escrow. MHA shall determine the affordability of the family's proposed financing. In making such a determination MHA will take into account the following:

- Other family expenses
- Certain types of financing
 - Seller-financing mortgages will be considered on a case by case basis,
 - Loan must be FHA-insured or insured through private mortgage insurers or terms consistent with HUD/FHA,

L. COMPLIANCE WITH FAMILY OBLIGATIONS

The family must agree, in writing, to comply with all family obligations under the Section 8 program and the MHA home ownership policies. These obligations include:

1. Attending ongoing home ownership counseling, as required,
2. Complying with the mortgage terms,
3. Not selling or transferring the home to anyone other than a member of the assisted family who resides in the home,
4. Not refinancing or adding debt secured by the home without the prior approval of MHA,
5. Not obtaining a present ownership interest in another residence while receiving home ownership assistance,
6. Supplying all required information to MHA,
7. The family must occupy the unit and may not sublease the home,
8. If the family composition changes they must notify MHA within 10 days.

In addition to the above the family must sign the Section 8 Home Ownership Obligations form.

M. AMOUNT OF ASSISTANCE

The amount of the monthly assistance payment will be based on:

1. The monthly homeownership expense – which includes:
 - i. Principal and interest on the initial mortgage and any mortgage insurance premium incurred to finance the purchase and any refinancing of such debt,
 - ii. Real estate taxes and public assessments,
 - iii. Homeowner's insurance,
 - iv. Approved major maintenance expenses,
 - v. Approved cost of major repairs and replacements,
 - vi. Utility allowance,
 - vii. Principal and interest on mortgage debt incurred to finance major repairs,
 - viii. Approved major replacements or improvements for home including changes needed to make the home accessible,
 - ix. Homeowner association dues,

The Home Ownership HAP will equal the lower of 1) the payment standard minus the TTP, or 2) monthly Home Ownership expenses minus the TTP.

Determining the payment standard – the voucher payment standard is the fixed amount the MHA establishes as the “fair market” rent for a unit of a particular size. In the Home Ownership Program, the initial payment standard will be the lower of either the payment standard for which the family is eligible based on family size, or the payment standard which is applicable to the size of the home the family wishes to purchase.

The payment standard for subsequent years will be based on the higher of the payment standard in effect at commencement of the home ownership assistance or the payment standard in effect at the most recent regular reexamination of the family's size and income.

The initial payment standard shall not be adjusted even if there is a subsequent decrease in family size.

MHA will request HUD approval of a higher payment standard, up to 120% of the published fair market rent limit, where warranted, as a reasonable accommodation for a family that includes a person with a disability.

Determining the Total Family Contribution - Total Family Contribution (TFC) is that portion of the home ownership expense that the family must pay. It is generally 30% of the family's adjusted income, plus any gap between the payment standard and the actual housing cost. All family income including public assistance will be counted to determine the family's adjusted monthly income for purposes of determining the amount of assistance.

N. PAYMENT OF THE HAP TO THE FAMILY OR LENDER

MHA will provide the lender with notice of the amount of the housing assistance payment prior to close of escrow and will pay the contribution directly to the family, unless otherwise required by the lender. The family will be responsible to submit the entire mortgage payment to the lender unless the lender and the participant provide a written agreement to MHA that requests that the payment be made directly to the lender.

O. TERMINATION OF SECTION 8 HOME OWNERSHIP ASSISTANCE

1. Grounds for termination of Home Ownership assistance include:

- Failure to comply with family obligations under the Section 8 Housing Choice Voucher Program or MHA's Home Ownership Policies.
- The family defaults on the mortgage.
- The family moves out of the home.
- The family assistance payment is determined to be \$0.00 for a period of six (6) consecutive months.
- The Maximum term of the Home Ownership assistance expires,
- Family may receive assistance for a maximum of ten (10) years unless the term of the loan is twenty (20) years or more, then the term of assistance is fifteen (15) years from the date the escrow closes.
- These maximum terms do not apply to disabled and elderly families.

2. Procedure for termination of Home Ownership Assistance – shall be the same as those set forth for tenancies, as set for in Chapter 22 of this Plan.

P. RECAPTURE OF HOME OWNERSHIP ASSISTANCE PAYMENTS

In certain circumstances the home ownership assistance payments provided to the family are subject to total or partial recapture upon the sale or refinancing of the home. Sales proceeds that are used by the family to purchase a new home with Section 8 home ownership assistance are not subject to recapture. Families that refinance to take advantage of better terms are not subject to recapture. Only cash-out proceeds from refinancing and sales proceeds not used to purchase a new home with Section 8 home ownership assistance are subject to recapture. Further, the amount of the home ownership assistance subject to recapture shall be reduced in annual increments of 10% beginning one year from the purchase date. At the end of 10 years the amount of home ownership assistance, or assistance to make repairs or improvements, subject to recapture will be zero.

Q. CONTINUED PARTICIPATION IN SECTION 8 HOUSING CHOICE VOUCHER PROGRAM.

If the family defaults on a FHA – insured mortgage MHA may permit the family to move with continued Section 8 housing choice rental assistance if the family demonstrates that it has conveyed title to the home to HUD or its designee, and moved from the home within a period established or approved by HUD.

If the family defaults on a non-FHA-insured mortgage – MHA may permit the family to move with continued Section 8 housing choice rental assistance if the family demonstrates that it has conveyed title to the home to the lender, or to MHA and moved from the home within the period established or approved by the lender and /or MHA.

R. MHA ADMINISTRATIVE FEE

For each month that home ownership assistance is paid by MHA on behalf of the family, MHA shall be paid the ongoing administrative fee described in 24 CFR § 982.152(b).

S. WAIVER OR MODIFICATION OF HOME OWNERSHIP POLICIES

The Executive Director of MHA shall have the discretion to waive or modify any provision of the Section 8 Home Ownership Program or policies not governed by statute or regulation for good cause or to comply with changes in HUD regulations or directives.

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| DECONCENTRATION |
|------------------------|

The Quality Housing and Work Responsibility Act of 1998 requires that a housing authority set forth in its Annual Plan a description of its admissions and other policies designed to provide for deconcentration of poverty and income mixing in identified projects where deconcentration has been determined to be necessary.

DECONCENTRATION POLICY

Section 8 Housing Choice Voucher Program

The MHA's policy is designed to provide maximum flexibility to assist families in making their housing choices regardless of race or income within qualifying income ranges.

The Section 8 Voucher program requires that 75% of all new participants receiving a certificate have incomes that do not exceed 30% of the area's median income. Families whose income does not exceed 30% of area median income will be referred to as "extremely low income families". MHA will monitor its admissions to ensure that the 75% requirement is met.

To increase housing choices of Section 8 participants, the MHA will inform all recipients of the full range of geographic areas where they may seek housing, including those outside of poverty or minority concentration. MHA will provide maps that show various areas with housing opportunities outside of areas of poverty or minority concentrations. With the assistance of our Housing Assistline staff, MHA will provide up-to-date information on affordable apartments and houses available in the County. These will include those located outside of poverty or minority concentration areas.

MHA will analyze whether rental voucher holders have experienced difficulties in finding housing outside areas of poverty or minority concentrations. An annual analysis of MHA's participant base will be undertaken to determine if half or more of all Section 8 families with children assisted by MHA are residing in *low* poverty census tracts and/or if the percentage of families that moved during the year into areas that are not considered low poverty is at least 2% higher than during the last fiscal year. Areas designated as having *high* poverty or minority concentrations are determined annually by a HUD survey. In Marin, there are currently three census tracts so designated as poverty-impacted: East San Rafael, downtown San Rafael, and Marin City.

Public Housing Program

Marin Housing has only one complex that is classified as a *General Occupancy* complex; therefore, MHA is exempt from the Quality Housing and Work Responsibility Act of 1998 that requires deconcentration of poverty in public housing projects. With respect to income targeting, MHA will monitor its admissions to ensure that at least 40% of families admitted to public housing each year have incomes that do not exceed 30% of area median ("extremely low income families").

MHA's policies are designed to provide maximum flexibility to its clients by providing them with the maximum number of housing choices regardless of race or income within qualifying income ranges.

Gross annual income is used for income limits at admission and for income-mixing purposes. MHA will gather data and analyze, at least annually, the tenant characteristics of its public housing stock, including information regarding tenant incomes, to assist in MHA's deconcentration efforts. In general, MHA's deconcentration policy emphasizes working with *current* residents to improve their incomes and become self-sufficient, thereby contributing to a broader income mix in the public housing community.

MHA will:

1. Consider transfers, in accordance with MHA's transfer policy, found in Chapter 11 of the Occupancy Policy, between projects and programs to provide flexible housing options and further deconcentration goals.
2. Inform applicants of the advantages available for working families, such as flat rents and the disallowance of earned income in certain circumstances. (Determination of Total Tenant Payment, Chapter 7, Occupancy Policy).
3. Encourage a broader range of incomes by implementing incentives for working families, as described in Chapter 7 of the Occupancy Policy.

**Resident Assessment
Survey
Improvement Plan**

HUD has not conducted the survey as of the date the MHA PLAN was noticed for public input.

**Status Report
Goals and Objectives – 2008**

1. Maximize Affordable Housing Options

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| <p>Fully Utilize Section 8 Voucher and Public Housing Programs</p> | <p>The Section 8 Housing Voucher Choice Program was under leased at the end of 2006 when MHA learned of a budget cut of \$3.1 M. In Spring 2007, HUD informed MHA of a restoration of \$2.8M and is processing the remaining 500 vouchers in the program. MHA plans to open the waitlist in early 2008. MHA also will explore opening Project based units through the RFP process.</p> |
| <p>Preserve Existing Affordable Housing Stock</p> | <p>MHA will achieve 100% of Section 8 Housing Quality Standards annual inspections.</p> <p>Sidewalk and driveway improvements were made at all MHA's residential properties this year.</p> <p>\$185,000 in new funds from 8 jurisdictions in Marin County was secured for the fiscal year 2007 for to support the Below-Market Rate Program.</p> |
| <p>Prevent Homelessness</p> | <p>Reporting period January through July 2007.</p> <p>Through the Rebate to Marin Renters program, shallow rent subsidies were provided to 40 elderly and disabled households. 150 formerly homeless mentally ill individuals received supportive services through the Shelter Plus Care Program.</p> <p>MHA has executed a Memorandum of Understanding with Legal Aid of Marin to collaborate to prevent tenants from losing their housing.</p> <p>25 persons with HIV/AIDS received HOPWA rental assistance.</p> <p>Secured \$50,000 new funds from the County of Marin to provide Information and Referral service to 2000 callers looking for housing assistance.</p> |
| <p>Promote Homeownership Opportunities</p> | <p>Maintained portfolio of 330 Below Market Rate homes; through July 2007, 12 new first-time homebuyers have purchased homes.</p> <p>Provided technical assistance to 3 developers regarding new affordable ownership housing developments. Conducted 1 first time homebuyer seminar.</p> <p>The Section 8 Homeownership Program assisted 2 families who have completed the loan approval process and are now living in their own homes.</p> <p>2 MCCs were issued to first-time homebuyers in conjunction</p> |

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| | with home purchase, representing \$631,700 in tax credits and \$3.2 million in mortgage loans. MHA will apply for new Mortgage Credit Certificates in October 2007. MHA began implementation of the American Dream Downpayment Assistance Program this year. |
| Increase Access to Housing Opportunities by Increasing Tenant Incomes | The Family Self-Sufficiency Program provided services to 44 Marin City Public Housing residents and 128 Section 8 participants. Total number of escrow accounts is 96. |

2. Enhance Services to Clients

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| Demystify Services Through Enhanced Communication | <p>The Housing Assistline responded to 1,814 calls and inquires.</p> <p>There have been 3 Section 8 briefings since January 1, 2007 through August 31, 2007. 28 families received vouchers with 8 of them finding housing. 19 of that group is still actively seeking housing.</p> <p>MHA has had 10 meetings with Marin City residents on maintenance and operations of the project since January 1, 2007 and will continue to have monthly meetings. There have been several safety meetings with poor attendance. MHA is working with the residents and Sheriff's department to revitalize the meetings. MHA is participating in a Task Force to reduce violence and improve activities for youth.</p> <p>MHA conducted budget workshops at each housing development.</p> <p>Newsletters are sent to all residents in public housing.</p> |
| Implement, Monitor and Improve Client Feedback | <p>MHA staffs meet monthly with residents for informational exchange.</p> <p>MHA's central office and the Marin City Public Housing project have client suggestion boxes.</p> <p>MHA will post the Annual Plan when approved by the Board of Commissioners on the website. MHA also plans to update the ACOP and Administrative Plans and make them available on the website.</p> <p>MHA will also establish a Fraud Hotline on the website.</p> |
| Streamline External Procedures | <p>Marin Housing is exploring ways to utilize the current technology to enhance the efficiency of the agency's operations. In-house information exchange will be via the computer. Information from HUD and other organizations will be gathered from the Internet and made available to staff on the computer. All employees with computers will have internal and external e-</p> |

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| | <p>mail and the agency continues to explore the uses of computer technology to communicate with and transmit contract and amendment changes to owners and landlords.</p> <p>Marin Housing has posted the public housing application on the website and plans to make the Section 8 application available on the website in Winter 2008.</p> <p>MHA is implementing the Limited English Program.</p> |
| Streamline Internal Procedures and Systems | The Section 8 Administrative and Public Housing Admission and Continual Occupancy policies are currently under review. |
| New database system to track homeless in the county. | MHA provides data regarding homelessness in Marin. MHA is working with the Continuum and the County of Marin to gather more specific data than that reported in MHA's APR. |

3. Continue to Build Collaborations

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| Build Collaborations with Other Agencies, Local Jurisdictions and the Private Sector | MHA senior staff attends and plays a leadership role in the Marin Continuum of Housing & Services meetings and the Housing Council. MHA's Executive Director has been working with the County of Marin to launch a "Project Homeless Connect" effort. She has also been working with 7 jurisdictions in Marin County to financially support the Below Market Rate homeownership program. |
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RESIDENT ADVISORY BOARD COMMENTS

Resident Membership of the PHA Governing Board

The Board of Commissioners of the Housing Authority of the County of Marin is comprised of the five members of the Board of Supervisors augmented with two residents – Marilyn Thompson and Isaiah Wallace. The Marin County Board of Supervisors selects these members pursuant to a public selection process.

Membership of the Resident Advisory Board

The Resident Advisory Board (RAB) consists of six Section 8 participants and six public housing residents. The RAB is appointed by the Board of Commissioners. (See Section 6)

**5 Year Plan for Fiscal Years 2008 - 2012
Annual Plan for Fiscal Year 2008**

We are members of MHA’s Resident Advisory Board (RAB) and do hereby certify that we have reviewed and are in agreement with the contents of the above-referenced plans.

This review has taken place during regular monthly meetings over the past six months, during this time of review; we have made suggestions and recommended changes, which are reflected, in the final Plan.

Sincerely,

Resident Advisory Board

(Original signatures are on file at the Marin Housing Authority Main Office)

| | | |
|------------|------------------|--------------------------------------|
| RAB: _____ | Sherri Anderson | Section 8 |
| _____ | Jerry McDonald | Section 8 |
| _____ | David Ervin | Section 8 |
| _____ | Robert Gallimore | Public Housing (Mixed Population) |
| _____ | Kevin Gladstone | Section 8 |
| _____ | Robert Hernandez | Public Housing (Mixed Population) |
| _____ | Royce McLemore | Public Housing (Family) |
| _____ | Sandy Shartzer | Section 8 |
| _____ | Gracie Stover | Public Housing (Family) |
| _____ | Anne Taylor | Public Housing (Mixed Population) |
| _____ | Isaiah Wallace | Public Housing (Family) |

**Golden Gate Village Resident Council Comments:
5 Year Plan for Fiscal Years 2008 – 2012;
Annual Plan for Fiscal Year 2008**

There are two concerns that the Golden Gate Village Resident Council has concerning the Plan.

1. **Section 8 – (4) Admissions Preferences** (2) *Which of the following admission preferences does the PHA plan to employ in the coming year?* Our Council recommends that MHA reinstitute “**Marin County resident or one who works in Marin County**” as a “local” preference. **Since Marin County has very few available very low-income housing, this preference will give very low-income Marin County residents an opportunity to afford to live in Marin. There are many homeless residents in Marin County who should be given local preference before applicants from outside of Marin County. Bringing Public Housing residents from other areas where violent crimes and gang-related activities are prominent will have a negative impact on Marin County.**

As it relates to Workforce workers in Marin County, this would give the Workforce workers an opportunity to afford to live in the County where they work. The Golden Gate Village Resident Council will advocate for these issues to be submitted in next year’s Plan.

2. **Section 8 - (4) Admissions Preferences** (4) *Among applicants on the waiting list with equal preference status, how are applicants selected?* Our Council recommends that an applicant be selected by **Date and time of application. By being selected by Date and Time, an applicant knows where they are on the waiting list. By using the “lottery”, an applicant can apply one week and within 3 weeks be housed, while it may take years for someone who actually applied s earlier to be housed if their name is not randomly picked. We will submit this recommendation to the Marin Housing Authority for review and hopefully to be changed next year.**

Sincerely,

Royce McLemore
President of Marin City Golden Gate Village Resident Council

October 2, 2007

Nannette Beacham-Sparks, Deputy Director
Marin Housing Authority
4020 Civic Center Drive
San Rafael, CA 94903

**Golden Gate Village Resident Council Comments:
5 Year Plan for Fiscal Years 2008 – 2012;
Annual Plan for Fiscal Year 2008**

The Marin City Golden Gate Village Resident Council requests that the Housing Authority include in the 5 year Plan its Youth Employment Mentoring Program (YEMP). This program has given our youth an opportunity to get involve in their community in the areas of gardening, program associates, secretary skills, graffiti removal and janitorial skills as well as acquire leadership skills, work with small children and develop an educational portfolio.

Sincerely,

Royce McLemore
President of Marin City Golden Gate Village Resident Council

Public/General Comments
5 Year Plan for Fiscal Years 2008 – 2012
Annual Plan for Fiscal Year 2008

I have reviewed the 5 yr plan and am able to agree with most of it. As much as I could digest. One concept that really stood out was, that rent could be adjusted for catastrophic illness or emergency situations. Defining those (emergencies) will take some work.

Thank you, Marin housing authority for being a real working model of what a community can offer. Housing is at the forefront of most people's mind their whole life. MHA was the first set of people that I came into contact with here in Marin (besides my one friend, who had also just moved here.) during the migration of my family. As a single father of 2, coming from Los Angeles, (where the housing authority offices are come complete with plate glass bullet proof windows from reception to the inner offices,) I was surprised and delighted that moving to a better life in Marin could be so smooth and welcoming. All of the people who worked in the MHA were kind and courteous to me and my family during a time that is considered to be one of the most stressful times in life. Moving to a place with no few friends and no family is quite the stressful situation. My family received immediate relief. Thank you!

I would like to continue to submit suggestions as my understanding of this PHA plan (5yr annual 08 plan) grows, and I am able to get a feeling for others in the community, and be able to reflect their concerns and make sure that people of this county get a chance at what I believe is the most important thing available in this great state, a shot at "quality of life". This begins with a stable, safe place to live and I have met many others in my 3 and 1/2 years here, who have been able to achieve this state of being, with the help of the staff and leadership of the MHA.

I am on the resident advisory board and our meetings with the director, Ms. Collins and the assistant director, Ms. Sparks were conducted with confidence and compassion, and they clearly wanted as much input from the rab (resident advisory board) and the community at large, in order to keep in touch with constantly changing conditions, in a constantly changing economy, and retain what makes life so unique and special to this region, we call home.

Sincerely,

David Ervin