

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

PHA Plans

5 Year Plan for Fiscal Years 2005 - 2009

Annual Plan for Fiscal Year 2008

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

PHA Plan Agency Identification

PHA Name: Tallahassee Housing Authority **PHA Number:** FL073

PHA Fiscal Year Beginning: (07/2007)

PHA Programs Administered:

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

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

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

Public Access to Information

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

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

Display Locations For PHA Plans and Supporting Documents

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

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

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

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

5-YEAR PLAN
PHA FISCAL YEARS 2005 - 2010
[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.
- X The PHA's mission is: (state mission here)
The PHA's mission is to improve the living condition of low-income families, provide better housing conditions and work with other agencies in the community to improve the economic and social status of the residents and their families.

B. Goals

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

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

- X PHA Goal: Expand the supply of assisted housing
Objectives:
X Apply for additional rental vouchers:
X Reduce public housing vacancies:
X Leverage private or other public funds to create additional housing opportunities:
X Acquire or build units or developments
X Other (list below)
Acquire affordable housing through its Replacement Housing Fund Program and Operate Tax Credit Development (Goodbread Hills)
- X PHA Goal: Improve the quality of assisted housing
Objectives:
X Improve public housing management: (PHAS score)
X Improve voucher management: (SEMAP score)
X Increase customer satisfaction:

- X Concentrate on efforts to improve specific management functions:
(list; e.g., public housing finance; voucher unit inspections)
 - X Renovate or modernize public housing units:
 - Demolish or dispose of obsolete public housing:
 - X Provide replacement public housing: (for Ebony Gardens) acquisition
 - Provide replacement vouchers:
 - Other: (list below)
- X PHA Goal: Increase assisted housing choices
- Objectives:
- X Provide voucher mobility counseling:
 - X Conduct outreach efforts to potential voucher landlords
 - Increase voucher payment standards
 - X Implement voucher homeownership program: (Established FY 2000)
 - X Implement public housing or other homeownership programs:
(Established 5H 1996)
 - Implement public housing site-based waiting lists:
 - Convert public housing to vouchers:
 - Other: (list below)

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

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

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

- X PHA Goal: Promote self-sufficiency and asset development of assisted households

Objectives:

- X Increase the number and percentage of employed persons in assisted families:
- X Provide or attract supportive services to improve assistance recipients' employability: Ongoing partnership
- X Provide or attract supportive services to increase independence for the elderly or families with disabilities.
- Other: (list below)

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

- X PHA Goal: Ensure equal opportunity and affirmatively further fair housing
Objectives:
 - X Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, and disability:
 - X Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, and disability:
 - Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required:
 - Other: (list below)

Other PHA Goals and Objectives: (list below)

- To provide a holistic approach to the public housing self sufficiency program
- Partner with N.W. Florida Housing Authority in providing homeownership opportunities to persons in Gadsden County
- Partner with local homeless coalitions in providing permanent housing for persons without shelter
- Expand training programs to public housing residents
- Develop fitness programs to decrease obesity and/or health programs in public housing
- Partner with local agencies in providing adult educational motivational programs/self esteem
- Leverage Capital Fund Grant monies to be used for capital improvement projects
- Develop a stronger partnership with local law enforcement in combating crime at the properties
- Public housing 5h amendments to include lease with the option to purchase of scattered site homes
- Partner with the City of Tallahassee Workforce Equity and Big Bend Fair Housing Office to identify and reduce fair housing and discrimination impediments
- Develop economic educational opportunities for Public Housing and Housing Choice Voucher residents

- Apply and receive LITHC from Florida Finance Housing to develop Crowder donated property
- Partner with Florida Housing Finance Corporation in gaining more Tenant Rental Assistance Vouchers
- Expand Section 3 program for Public Housing residents with local apprenticeship program
- Work on improving housing stock at scattered sites
- Increase Homeownership among public housing scattered site families/section 8 eligible clients
- Apply for the 21st Century Grant with Department of Education, which will allow funding for community center programs
- Improve housing energy reduction program with upgrades

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

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.

The highlight of this year's plan was the sale of a scattered site house (public housing) to one of our residents. We believe that with the assistance of the ROSS Homeownership Supportive Grant, there will be increased accomplishments as such for the residents of this housing authority.

iii. Annual Plan Table of Contents

[24 CFR Part 903.7 9 (r)]

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

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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:

- X Admissions Policy for Deconcentration fl073a01
- X FY 2008 Capital Fund Program Annual Statement fl073b01
- Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)
- List of Resident Advisory Board Members
- List of Resident Board Member
- Community Service Description of Implementation
- Information on Pet Policy
- Section 8 Homeownership Capacity Statement, if applicable
- Description of Homeownership Programs, if applicable

Optional Attachments:

- PHA Management Organizational Chart
- FY 2008 Capital Fund Program 5 Year Action Plan
- Public Housing Drug Elimination Program (PHDEP) Plan
- X Comments of Resident Advisory Board or Boards (must be attached if not included in PHA Plan text) fl073c01
- X Other (List below, providing each attachment name)
 - CFP FL29P073501-07 – fl073d01
 - RHP FL29R07350106 – fl073e01
 - RHP FL073R073503-06 – fl073f01
 - RHP FL073R073501-07 – fl073g01
 - RHP FL073R073501-08 – fl073h01

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

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 housing A & O Policy	Annual Plan: Rent Determination
X	Schedule of flat rents offered at each public housing development <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies <input 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	Annual Plan: Operations and Maintenance

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
	eradication of pest infestation (including cockroach infestation)	
X	Public housing grievance procedures X check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
X	Section 8 informal review and hearing procedures X 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
X	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant	Annual Plan: Capital Needs
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
X	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans or any other approved proposal for development of public housing	Annual Plan: Capital Needs
X	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition
X	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing
X	Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act	Annual Plan: Conversion of Public Housing
X	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership
X	Policies governing any Section 8 Homeownership program X check here if included in the Section 8 Administrative Plan	Annual Plan: Homeownership
X	Any cooperative agreement between the PHA and the TANF agency	Annual Plan: Community Service & Self-Sufficiency
X	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
X	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports	Annual Plan: Community Service & Self-Sufficiency
N/A	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
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
	Troubled PHAs: MOA/Recovery Plan	Troubled PHAs
	Other supporting documents (optional)	(specify as needed)

List of Supporting Documents Available for Review		
Applicable & On Display	Supporting Document	Applicable Plan Component
	(list individually; use as many lines as necessary)	

1. Statement of Housing Needs

[24 CFR Part 903.7 9 (a)]

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

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

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Loca-tion
Income <= 30% of AMI	4545	5	4	3	4	3	3
Income >30% but <=50% of AMI	1934	4	4	3	2	2	3
Income >50% but <80% of AMI	5013	3	3	2	2	3	3
Elderly	3063	3	2	2	2	1	3
Families with Disabilities	385	4	5	4	2	2	3
Race/Ethnicity	2/2						
Race/Ethnicity	2/2						
Race/Ethnicity	1/2						
Race/Ethnicity	2/2						

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: 2007
- U.S. Census data: the Comprehensive Housing Affordability Strategy ("CHAS") dataset
- American Housing Survey data
Indicate year:
- Other housing market study – Shimberg Center for Affordable Housing
Indicate year: 2007
- 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 type="checkbox"/> Public Housing			
X Combined Section 8 and Public Housing			
<input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/subjurisdiction:			
HCV 3100 PH 1718	# of families	% of total families	Annual Turnover
Waiting list total	2493		145
Extremely low income <=30% AMI	2232	90%	
Very low income (>30% but <=50% AMI)	133	5%	
Low income (>50% but <80% AMI)	128	5%	
Families with children	2140	86%	
Elderly families	36	1%	
Families with Disabilities	317	13%	
Race/ethnicity	1/1 (61)	3%	
Race/ethnicity	1/2 (136)	5%	
Race/ethnicity	2/2 (2296)	92%	
Race/ethnicity	0	0	
Characteristics by Bedroom Size (Public Housing Only)			

Housing Needs of Families on the Waiting List			
1BR	47	3%	8
2 BR	102	6%	27
3 BR	1500	67%	45
4 BR	63	4%	12
5 BR	6	.003%	4
5+ BR			
Is the waiting list closed (select one)? X No <input type="checkbox"/> Yes PH open to 3,4 & 5 If yes: Section 8 (yes) How long has it been closed (# of months)? 7 Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No X Yes (PH) Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No X Yes (PH only) HUD opt-outs and contract terminations or 10 families annually to PH under the FUD program			

C. Strategy for Addressing Needs

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

(1) Strategies

Need: Shortage of affordable housing for all eligible populations

To actively work with developers and new owners for new affordable housing developments and rental rehabilitation programs

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

Select all that apply

- X Employ effective maintenance and management policies to minimize the number of public housing units off-line
- X Reduce turnover time for vacated public housing units
- X Reduce time to renovate public housing units
- X 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
- X Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- X Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required

- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies
- Other (list below)

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

Select all that apply

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

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

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

Select all that apply

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

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

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

Select all that apply

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

Need: Specific Family Types: The Elderly

Strategy 1: Target available assistance to the elderly:

Select all that apply

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

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

Select all that apply

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

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

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

Select if applicable

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

Strategy 2: Conduct activities to affirmatively further fair housing

Select all that apply

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

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

(2) Reasons for Selecting Strategies

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

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

2. Statement of Financial Resources

[24 CFR Part 903.7 9 (b)]

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

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2008 grants)		
a) Public Housing Operating Fund	\$2,268,055	Public Housing
b) Public Housing Capital Fund	\$909,551	Modernization
c) PH Replacement Housing Program	\$190,364	Development/Replacement Housing
d) ROSS - HSS	\$82,061	Public Housing Homeownership
e) Annual Contributions for Section 8 Tenant-Based Assistance	\$14,284,078	HAP & Administration Fee
f) Section 8 – Astoria Arms I & II	\$231,197	Opt-out
g) Section 8 – Suakoko Villa Apt.	\$127,423	Opt-out
h) ROSS – FSS	\$22,095	Public Housing – Family Self Sufficiency Program

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
i)		
Other Federal Grants (list below)		
DVP, DHAP, HANO	\$173,190	
2. Prior Year Federal Grants (unobligated funds only) (list below)		
FL29P073501-07	\$207,008	Modernization
FL29P073501-06	\$181,348	Modernization
FL29P073502-06	\$5,358	Modernization
FL29R073501-07	\$174,395	Modernization
3. Public Housing Dwelling Rental Income	\$1,115,000	Public Housing
4. Other income (list below)		
Excess utilities	\$202,220	Public Housing
Work Orders, Late Fees	\$44,942	Public Housing
4. Non-federal sources (list below)		
City of Tallahassee	\$23,051	Economic Development
Summer Food Program	\$22,818	Public Housing
Total resources	\$20,264,154	

3. PHA Policies Governing Eligibility, Selection, and Admissions

[24 CFR Part 903.7 9 (c)]

A. Public Housing

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

(1) Eligibility

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

- When families are within a certain number of being offered a unit: (state number)
- When families are within a certain time of being offered a unit: (state time)
- X Other: (describe)
Based on date and time after applicant's enrollment
- b. Which non-income (screening) factors does the PHA use to establish eligibility for admission to public housing (select all that apply)?
- X Criminal or Drug-related activity
- X Rental history
- X Housekeeping
- Other (describe)
- c. X Yes No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?
- d. X Yes No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?
- e. Yes X 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)
- X Community-wide list
- Sub-jurisdictional lists
- Site-based waiting lists
- Other (describe)
- b. Where may interested persons apply for admission to public housing?
- X PHA main administrative office
- PHA development site management office
- Other (list below)
- c. If the PHA plans to operate one or more site-based waiting lists in the coming year, answer each of the following questions; if not, skip to subsection **(3) Assignment**
1. How many site-based waiting lists will the PHA operate in the coming year?
2. Yes No: Are any or all of the PHA's site-based waiting lists new for the upcoming year (that is, they are not part of a previously-HUD-approved site based waiting list plan)?
If yes, how many lists?

3. Yes No: May families be on more than one list simultaneously
If yes, how many lists?
4. Where can interested persons obtain more information about and sign up to be on the site-based waiting lists (select all that apply)?
- PHA main administrative office
 - All PHA development management offices
 - Management offices at developments with site-based waiting lists
 - At the development to which they would like to apply
 - Other (list below)

(3) Assignment

- a. How many vacant unit choices are applicants ordinarily given before they fall to the bottom of or are removed from the waiting list? (select one)
- One
 - X Two
 - Three or More
- b. X 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 X 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)
- X Emergencies
 - X Overhoused
 - X Underhoused
 - X Medical justification
 - X Administrative reasons determined by the PHA (e.g., to permit modernization work)
 - Resident choice: (state circumstances below)
 - Other: (list below)

c. Preferences

1. X Yes No: Has the PHA established preferences for admission to public housing (other than date and time of application)? (If “no” is selected, skip to subsection **(5) Occupancy**)
2. Which of the following admission preferences does the PHA plan to employ in the coming year? (select all that apply from either former Federal preferences or other preferences)

Former Federal preferences:

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

Other preferences: (select below)

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

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

1 Date and Time

Former Federal preferences:

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

- 1 Homelessness
- 1 High rent burden

Other preferences (select all that apply)

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

4. Relationship of preferences to income targeting requirements:

- The PHA applies preferences within income tiers
- X 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)

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

b. How often must residents notify the PHA of changes in family composition?

(select all that apply)

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

(6) Deconcentration and Income Mixing

a. X 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. X 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:

X Employing waiting list "skipping" to achieve deconcentration of poverty or income mixing goals at targeted developments
If selected, list targeted developments below: PHA wide

X Employing new admission preferences at targeted developments
If selected, list targeted developments below: PHA wide

Other (list policies and developments targeted below)

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

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

Additional affirmative marketing

Actions to improve the marketability of certain developments

Adoption or adjustment of ceiling rents for certain developments

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

Other (list below)

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

Not applicable: results of analysis did not indicate a need for such efforts

List (any applicable) developments below:

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

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

B. Section 8

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

(1) Eligibility

- a. What is the extent of screening conducted by the PHA? (select all that apply)
- X Criminal or drug-related activity only to the extent required by law or regulation
 - Criminal and drug-related activity, more extensively than required by law or regulation
 - More general screening than criminal and drug-related activity (list factors below)
 - Other (list below)
- b. X Yes No: Does the PHA request criminal records from local law enforcement agencies for screening purposes?
- c. X Yes No: Does the PHA request criminal records from State law enforcement agencies for screening purposes?
- d. Yes X No: Does the PHA access FBI criminal records from the FBI for screening purposes? (either directly or through an NCIC-authorized source)
- e. Indicate what kinds of information you share with prospective landlords? (select all that apply)
- Criminal or drug-related activity
 - X Other (describe below)

Rental History

(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)
- X 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)

- X PHA main administrative office
- Other (list below)

(3) Search Time

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

If yes, state circumstances below:

Medical, portability and families unable to lease up due to large family size or searches in low poverty areas.

(4) Admissions Preferences

a. Income targeting

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

b. Preferences

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

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

Former Federal preferences

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

Other preferences (select all that apply)

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

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

Date and Time

Former Federal preferences

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

Other preferences (select all that apply)

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

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

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

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

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

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

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

(5) Special Purpose Section 8 Assistance Programs

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

- X 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?

- X Through published notices
X Other (list below)
Direct contact with applicable 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. Yes No: Has the PHA adopted any discretionary minimum rent hardship exemption policies?

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

Minimum rent hardship

1. Lost eligibility/awaiting determination for Federal, State or Local assistance program
2. Family income decreases because of changed circumstances (unemployed), death in family
3. Changes in assistance

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)

- X For the earned income of a previously unemployed household member
- X For increases in earned income
- Fixed amount (other than general rent-setting policy)
If yes, state amount/s and circumstances below:
- Fixed percentage (other than general rent-setting policy)
If yes, state percentage/s and circumstances below:
- For household heads
- For other family members
- For transportation expenses
- For the non-reimbursed medical expenses of non-disabled or non-elderly families
- Other (describe below)

e. Ceiling rents

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

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

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

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

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

- Market comparability study
- Fair market rents (FMR)
- 95th percentile rents
- 75 percent of operating costs
- 100 percent of operating costs for general occupancy (family) developments

- Operating costs plus debt service
- The "rental value" of the unit
- Other (list below)

f. Rent re-determinations:

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

- Never
- At family option
- X Any time the family experiences an income increase
- Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold)_____
- Other (list below)

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

(2) Flat Rents

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

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

B. Section 8 Tenant-Based Assistance

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

(1) Payment Standards

Describe the voucher payment standards and policies.

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

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

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

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

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

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

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

- Annually
 Other (list below)

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

- Success rates of assisted families
 Rent burdens of assisted families
 Other (list below)
 - Owners rendering units for hardship accessibility
 - Market Analysis

(2) Minimum Rent

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

- \$0

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

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

5. 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.
- A brief description of the management structure and organization of the PHA follows: The THA has a seven member Board of Commissioners who approves policies and a Executive Director who handles the day to day operations

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 07	Expected Turnover
Public Housing	475	30
Section 8 Vouchers	1907	50
Section 8 Certificates	N/A	
Section 8 Mod Rehab	N/A	
Special Purpose Section 8 Certificates/Vouchers (list individually)		
Family Unification	76	5
Mainstream	75	5
Protected Vouchers	17	3
Public Housing Drug Elimination Program (PHDEP)		

Other Federal Programs (list individually)		

C. Management and Maintenance Policies

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

- (1) Public Housing Maintenance and Management: (list below)
- (2) Section 8 Management: (list below)

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:

- 2. Which PHA office should residents or applicants to public housing contact to initiate the PHA grievance process? (select all that apply)
 - PHA main administrative office
 - PHA development management offices
 - Other (list below)

B. Section 8 Tenant-Based Assistance

- 1. Yes No: Has the PHA established informal review procedures for applicants to the Section 8 tenant-based assistance program and informal hearing procedures for families assisted by the Section 8 tenant-

based assistance program in addition to federal requirements found at 24 CFR 982?

If yes, list additions to federal requirements below:

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)
Section 8 Administrator

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.

See attached fl073b01 – CFP08

A. Capital Fund Activities

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

(1) Capital Fund Program Annual Statement

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

Select one:

- The Capital Fund Program Annual Statement is provided as an attachment to the PHA Plan at Attachment (state name) fl073b01

-or-

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

(2) Optional 5-Year Action Plan

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

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

b. If yes to question a, select one:

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

-or-

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

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

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

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

1. Development name:

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:

- Yes X 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 X 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 X 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: <u>(DD/MM/YY)</u>
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:

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 X 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: (DD/MM/YY)	
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 X 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)

- Units addressed in a pending or approved demolition application (date submitted or approved: _____)
- Units addressed in a pending or approved HOPE VI demolition application (date submitted or approved: _____)
- Units addressed in a pending or approved HOPE VI Revitalization Plan (date submitted or approved: _____)
- Requirements no longer applicable: vacancy rates are less than 10 percent
- Requirements no longer applicable: site now has less than 300 units
- 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)]

- Public Housing (Family self-sufficiency Program)
- Section 8 (Family self-sufficiency Program)
- ROSS Homeownership Supportive Services

A. Public Housing

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

1. X 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: Scattered Site Homes 1b. Development (project) number: 715 - 716
2. Federal Program authority: <input type="checkbox"/> HOPE I <input checked="" 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 checked="" 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: (01/01/1997)
5. Number of units affected: 34 FL07315 & FL07316 6. Coverage of action: (select one) <input type="checkbox"/> Part of the development <input checked="" 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: The Housing Choice Voucher Program in partnership with community agencies, provides money management, credit restoration and down payment assistance to first time homebuyers who meet the programs income criteria

a. Size of Program: 24

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

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

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

b. PHA-established eligibility criteria

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

If yes, list criteria below:

- Meet minimum income requirement (12,000.00)
- 1 year full time employment
- Complete homebuyer's readiness class

12. PHA Community Service and Self-sufficiency Programs

[24 CFR Part 903.7 9 (I)]

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

A. PHA Coordination with the Welfare (TANF) Agency

1. Cooperative agreements:

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

If yes, what was the date that agreement was signed? **01/15/2005**

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)

- X 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)

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

b. Economic and Social self-sufficiency programs

- X 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	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or

		selection/specific criteria/other)		both)
<i>COT/PHA Internship Program</i>	75	<i>Other</i>	<i>PHA main office</i>	<i>PH/SEC.8</i>
Dream Builders	25	Referral	PHA Wide	PH/SEC.8
Jump Start Financial Literacy	25	Other	PHA Wide	PH/Sec.8/Comm. Wide
Capital Solutions Group	15	Referral	PHA Wide	PH/SEC.8
Big Bend Workforce Plus	Open	Other	PHA Wide	PH/Sec.8
Junior Achievement				

(2) Family Self Sufficiency program/s

a. Participation Description

Family Self Sufficiency (FSS) Participation		
Program	Required Number of Participants (start of FY 2005 Estimate)	Actual Number of Participants (As of: DD/MM/YY)
Public Housing	25	18
Section 8	58	90

- b. X 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

- 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)
 - X Adopting appropriate changes to the PHA's public housing rent determination policies and train staff to carry out those policies
 - X Informing residents of new policy on admission and reexamination
 - X Actively notifying residents of new policy at times in addition to admission and reexamination.
 - X 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

The PHA is administering the Community Service Requirement. Residents were noticed in 2004 that those not exempt from contributing eight hours per month in community service or to participate in a self-sufficiency program will be subjected to this HUD Act. Site managers and the Resident Initiative Coordinator are working together to implement this policy. The Public Housing Administrator or his/designee will provide final assignment and prior approval. Residents will be encouraged to volunteer with their Resident Council (Orange Avenue United Tenants Association). There currently exists a partnership between the Big Bend Workforce Plus in offering training/educational opportunities to persons of public housing. Residents involved in the self-sufficiency program (18) are required to meet monthly in order to stay focused on their objective of lessening the dependency on governmental programs. There is also a partnership with a License Clinical Social Worker. Residents are referred by the Resident Initiative Coordinator to the LCSW for strategic planning in overcoming their barriers that may have a large impact on their goals.

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)

- X High incidence of violent and/or drug-related crime in some or all of the PHA's developments
- X High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to the PHA's developments
- X Residents fearful for their safety and/or the safety of their children
- Observed lower-level crime, vandalism and/or graffiti
- X 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
- X Other (describe below)
Perception of youth gang activities at some public housing sites

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

- X Safety and security survey of residents
- X 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
- X Resident reports
- X PHA employee reports
- X Police reports
- X Demonstrable, quantifiable success with previous or ongoing anticrime/anti drug programs
- X Other (describe below)
 - Monthly police Weed and Seed meetings**
 - HUD Resident Surveys**
 - Partnership with Leon County Sheriff Department in creating Crime Watch Groups**

3. Which developments are most affected? (list below)
- Springfield Apartments 1700 Joe Louis Street**
 - Orange Avenue Apartments 2710 Country Club Drive**
 - Pinewood Place 2940 Grady Road**

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
 - X Crime Prevention Through Environmental Design
 - X Activities targeted to at-risk youth, adults, or seniors
 - Volunteer Resident Patrol/Block Watchers Program
 - X Other (describe below)
 - Continue meeting with local law enforcement agencies and other anti gang groups**
 - Crime Prevention Programs within Community Centers**
 - Establish mentoring program and Youth Leadership Program**

2. Which developments are most affected? (list below)
- Springfield Apartments 1700 Joe Louis Street**
 - Orange Avenue Apartments 2710 Country Club Drive**
 - Pinewood Place Apartments 2940 Grady Road**

C. Coordination between PHA and the police

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

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

PHA wide

D. Additional information as required by PHDEP/PHDEP Plan

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

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

14. RESERVED FOR PET POLICY

[24 CFR Part 903.7 9 (n)]

THA amended the established Pet Policy 11-03 to govern the keeping of pets for the elderly and disabled residents in properties owned and operated by the PHA. This does not apply to animals that assist, support or provide service to persons with disabilities. Pet is defined as a domesticated dog weighing twenty (20) pounds or less at maturity or any domesticated cat, bird, rodent, (rabbit), fish or turtle that is traditionally kept in the home for pleasure rather than commercial purposes. Dogs and cats will be required to wear a collar. Reptiles (except turtles are excluded from the definition. All pets will be required to live inside of the unit.

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.

16. Fiscal Audit

[24 CFR Part 903.7 9 (p)]

1. X Yes No: Is the PHA required to have an audit conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h))?
(If no, skip to component 17.)
2. X Yes No: Was the most recent fiscal audit submitted to HUD?
3. X Yes No: Were there any findings as the result of that audit?
4. Yes X No: If there were any findings, do any remain unresolved?
If yes, how many unresolved findings remain? _____
5. X 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. X Yes No: Is the PHA engaging in any activities that will contribute to the long-term asset management of its public housing stock, including how the Agency will plan for long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs that have **not** been addressed elsewhere in this PHA Plan?
2. What types of asset management activities will the PHA undertake? (select all that apply)
 - Not applicable
 - Private management
 - X Development-based accounting
 - X Comprehensive stock assessment
 - X Other: (list below)

Those offered as it pertains to the new HUD regulations concerning asset management – PIH 2006 10 (February 3, 2006)

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)]

Resident Advisory Board consisted of OAUTA Residential Board – Oliver Hill, Sr., Ruthie Netterville, Ruthie Brown and oversight by Legal Services of North Florida.

A. Resident Advisory Board Recommendations

1. Yes No: Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?
2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)
 Attached at Attachment (File name) fl073c01
 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:
 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 registered with the PHA and requested a place on ballot
 Other: (describe)
- b. Eligible candidates: (select one)
 Any recipient of PHA assistance
 Any head of household receiving PHA assistance
 Any adult recipient of PHA assistance
 Any adult member of a resident or assisted family organization
 Other (list)

c. Eligible voters: (select all that apply)

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

C. Statement of Consistency with the Consolidated Plan

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

1. Consolidated Plan jurisdiction: (provide name here) **Department of Community Affairs, City of Tallahassee**

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)

- X The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.
- X 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.
- X Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
Affordable Rental Housing
Self –Sufficiency
Expansion of Homeownership
- Other: (list below)

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

D. Other Information Required by HUD

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

Attachments

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

PHA Plan Table Library

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

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

Capital Fund Grant Number FFY of Grant Approval: (MM/YYYY)

Original Annual Statement

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

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

Development Number/Name HA-Wide Activities	General Description of Major Work Categories	Development Account Number	Total Estimated Cost

Annual Statement

Capital Fund Program (CFP) Part III: Implementation Schedule

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

Optional Table for 5-Year Action Plan for Capital Fund (Component 7)

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

Optional 5-Year Action Plan Tables				
Development Number	Development Name (or indicate PHA wide)	Number Vacant Units	% Vacancies in Development	
Description of Needed Physical Improvements or Management Improvements			Estimated Cost	Planned Start Date (HA Fiscal Year)
Total estimated cost over next 5 years				

TALLAHASSEE HOUSING AUTHORITY
Public Housing/Section 8 Policy

Deconcentration and Income Targeting

The Tallahassee Housing Authority owns and operates 538 public housing units. At least forty percent (40%) (with incomes below 30 percent of median) in a fiscal year, of any new or available public housing apartments must be designated to extremely low-income people. The Authority shall provide more than seventy-five percent (75%) of newly available vouchers and certificates to very poor families.

The Tallahassee Housing Authority has a total of 1,977 Section 8 units. Seventy-five percent (75%) of the new or turned over Section 8 vouchers must be directed toward extremely low-income people. After the housing authority has met the income targeting requirements, it will select new admissions under its Local Preference Policy. On October 1, 1996, the Tallahassee Housing Authority, Board of Commissioners suspended the Federal Preferences and adopted Local Preferences for public housing and Section 8 programs. The new preferences were not ranked and are as shown below:

- Working families
- Families registered/enrolled in a recognized job training program
- Families of domestic violence
- Families involuntarily displaced

1. Working Families

- Working Families whose head of household or spouse work or families whose head of household or spouse have been given a bona fide offer of employment. Those who are in or have completed educational or training programs designed to prepare persons for the job market.
- Applicants households whose head, spouse, or sole member is age 62 or older or is receiving social security disability, supplemental security income disability benefits, or any other payments based on the individuals inability to work will be given the benefit of the working family preference.

2. Families Registered or Enrolled in Job Training Programs

- Families where the head of household or spouse is currently enrolled and participating in a job training program (this will also include WAGES participants) that prepares them for entering or re-entering the job market to include welfare to work certified programs and/or, those performing eight or more hours of community service work as included in Section 512©(g) of the U.S. Housing Act of 1937. Documentation will be required from the institution where the head of the household or spouse is attending.

3. Domestic Violence

- “Domestic Violence” means actual or threatened physical violence directed against one or more members of the applicant family by a spouse or other member of the applicant’s household.
 - a. An applicant is considered a victim if:
 - they have vacated a housing unit because of domestic violence
 - they live in a housing unit with a person who engages in domestic violence
 - it must be determined that the domestic violence occurred recently or is of a continuing nature
 - the family must certify that the person who engaged in such violence will not reside with the applicant family unless the housing authority has given written approval based on certified counseling support documents.

4. Involuntary Displacement

- a. An applicant is involuntarily displaced if:
 - the applicant is a victim of fire
 - the applicant is displaced due to a natural disaster (fire, flood, or any other uncontrollable act)
 - the natural disaster must have extensively damaged or destroyed the dwelling the family had been living in and made it uninhabitable

All applicants must meet all other pre-background screening as other non-preference applicants do.

Notice of Preference Denial

When the housing authority determines an applicant does not qualify for a local preference, the housing authority will provide prompt, written notice of the determination. The notice will contain a brief statement of reasons for the determination and notice of the applicants right to an appeal. The applicant can appeal to the specified appeal officer as indicated in correspondence.

Skipping Policy

Families on the waiting list for public housing will be under a Skipping Admissions Policy. This would mean the housing authority could uniformly skip a family on the waiting list, specifically to reach another family with a lower or higher income in order to help accomplish the deconcentration and income-mixing objectives as specified by HUD

The current waiting list for public housing is 1761. Below is the breakdown as it relates to race and income:

<u>Race</u>	<u>Very Low Income</u>	<u>Low Income</u>
1(Caucasian) 18	134	121
2(Black) 11	1002	457
3(Hispanic)	17	26
4(Other)		4

The current waiting list for Section 8 is 776. Below is the breakdown as it relates to race and income:

<u>Race</u>	<u>Very Low Income</u> To be determined	<u>Low Income</u> To be determined
1(Caucasian)		
1(Black)		
3(Other)		

The housing authority’s targeting plan will conform with civil rights, fair housing and other federal laws that forbid discrimination on the basis of race, color, religion, sex, national origin, familial status or disability.

Both program waiting lists will be managed separately. Public Housing will not include site base waiting lists, but rather one centralized list.

The remaining sixty-percent (60%) of waiting list applicants for public housing will be selected according to the income needs of the development. This is based on the deconcentration plan required by the U.S. Department of Housing and Urban development (HUD) in order to achieve income-mixing, by bringing higher income residents into lower income public housing communities and bring lower income residents into higher income public housing communities.

Authority Incentives

The Authority’s three public housing communities, Springfield Apartments (1700 Joe Louis Street), Orange Avenue Apartments (2710 Country Club Drive) and Pinewood Place Apartments (2940 Grady Rd.) are all geographically located in low-income (poverty) areas of the city. Under our Comprehensive Modernization Grant, in October

1999, we began to replace furnaces at all the sites and installed new gas energy efficient HVAC with air-conditioning features. Resealing of parking spaces has begun and will include re-striping. In the near future, installation of new energy efficient windows and higher R-Factor attic insulation will begin.

Eight residents have also been employed by the Authority under the Section 3 Program, along with contractors awareness of preference given to residents on all work performed for the housing authority.

The Tallahassee Housing Authority has a partnership with workforce plus and TANF to provide on site resident training. This is further being strengthened by contacts initiated by the Resident Initiative Coordinator.

Public housing residents will be able to choose whether they would like to pay a flat rent or an income-based rent.

- An income-based rent will be based on 30% of adjusted income.
- Flat rents will benefit higher income families and residents whose incomes are going up.

Residents will have the choice of income-based or flat rent yearly at their re-examination time. However, if they experience financial hardship (loss of employment, death of income contributing family member or loss of governmental assistance) the THA may authorize a switch from flat rent to income-based.

Residents of the Authority's developments and participants of Section 8, who are WAGES enrolled, whose welfare assistance is reduced because of fraud or failure to participate in an economic self-sufficiency program or comply with a work activity requirement will not be eligible for a rent reduction. Only if the welfare reduction is neither a result of the expiration of a lifetime on receiving benefits, or a situation where the family has complied with welfare program requirements, but cannot obtain employment with the authority, make the necessary rent subsidy increase. All others with a non-compliance verified document can request variance to the above and community service sanctions with their respective department hearing officer (public housing and Section 8).

Permissive deductions incentives will be given to residents that are working a minimum of 25 hours per month. Incentives deductions that will be allowed are federal tax deductions, social security taxes and health insurance.

Self-Sufficiency Incentives

The Authority will not increase a family's rent as a result of increased income due to employment during the 12-month period beginning on the date on which the employment is commenced:

1. Family income increases as a result of employment of a family member who was previously unemployed for one or more years. “Previously employed” includes a person who has earned, in the previous 12 months, no more than what would be received for ten hours of work per week for 50 weeks at the established minimum wage.
2. Whose employment income increases during the participation of a family member in any family self-sufficiency or other job training; or
3. Who is or was, when six months assisted under any state program for temporary assistance for needy families funded under Part A of Title IV of the Social Security Act, as determined by the authority in consultation with the local TANF Agency and whose income increases.

Phase-in of Rent Increases

Upon expiration of the 12-month period, the rent payable by a family may be increased due to the continued employment of a family member except that for the 12-month period following expiration of the 12 month disallowance, the increase may not be greater than 50 percent of the amount of the total rent increase.

Individual Savings Accounts

The Authority may provide for individual savings accounts for public housing residents who pay an income-based rent. The family will have the option of having an amount that otherwise would have been applied to the family’s rent payment as a result of employment. Amounts deposited in a savings account may be withdrawn only for the purpose of:

- Purchasing a home
- Paying education costs of family members
- Moving out of public or assisted housing
- Paying any other expense authorized by the authority for the purpose of promoting the economic self-sufficiency of residents of public housing.

The Authority will maintain the account in an interest bearing investment and will credit the family with the interest income; at least annually the Authority will provide the family with a report on the status of the account. Any balance in such an account when the family moves out is the property of the family, unless the family is not in compliance with the lease.

CAPITAL FUND PROGRAM TABLES

Annual Statement/Performance and Evaluation Report					
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part I:					
Summary					
PHA Name: Tallahassee Housing Authority	Grant Type and Number Capital Fund Program Grant No: FL29P073501-08 Replacement Housing Factor Gran	Federal FY of Grant: 2008			
[X]Original Annual Statement [] Reserve for Disasters/Emergencies [] Revised Annual Statement (revision no:)					
[] Performance and Evaluation Report for Period Ending: [] Final Performance and Evaluation Report					
Line No.	Summary by Development Account	Total Estimated Cost		Total Annual Cost	
		Original	Revised	Obligated	Expended
1	Total Non-CFP Funds				
2	1406 Operations	50,000			
3	1408 Management Improvements	162,000			
4	1410 Administration	90,955			
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement	111,500			
10	1460 Dwelling Structures	419,500			
11	1465.1 Dwelling Equipment - Nonexpendable	21,096			
12	1470 Nondwelling Structures				
13	1475 Nondwelling Equipment	54,500			
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs				
18	1499 Development Activities	0			
19	1501 Collaterization of Debt Service				
20	1502 Contingency				
21	Amount of Annual Grant: (sum of lines 2- 20)	909,551			
22	Amount of line 21 Related to LBP Activities	0			
23	Amount of line 21 Related to Section 504 Compliance	0			
24	Amount of line 21 Related to Security - Soft Costs	0			
25	Amount of line 21 Related to Security - Hard Costs	0			
26	Amount of line 21 Related to Energy Conservation Measures	0			

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

PHA Name: Tallahassee Housing Authority		Grant Type and Number Capital Fund Program Grant No: FL29P073501-08 Replacement Housing Factor Grant No:				Federal FY of Grant: 2008		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Devel. Acct #	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
Central Office	Administrative Costs	1410						
	Management Fee			90,955				
	total 1410 - Administration			90,955				
	Non-Dwelling Equipment	1475						
	Upgrade Computer Servers			2,500				
	total 1475 - Non-Dwelling Equipment			2,500				
	TOTAL CENTRAL OFFICE			93,455				
FL073000001	Management Improvements	1408						
Springfield	Staff Training in Hud Regulations			2,500				
	Maintenance Skills Training			1,500				
	Resident Initiatives - Drug Intervention/Prevention			40,000				
	total 1408 - Management Improvements			44,000				
	Maintain the grounds to improve safety/health issues and property values	1450						
	Erosion Control			35,000				
	Additional Parking - Community Center			5,000				
	Playground - Community Center			18,000				
	total 1450 -Site Improvement			58,000				

Annual Statement/Performance and Evaluation Report								
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)								
Part II: Supporting Pages								
PHA Name: Tallahassee Housing Authority			Grant Type and Number Capital Fund Program Grant No: FL29P073501-08 Replacement Housing Factor Grant No:				Federal FY of Grant: 2008	
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Devel. Acct #	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
FL073000001	Maintain the structure to improve safety/health issues and property values	1460						
Springfield	Repair/Replace roofs		10	38,000				
	Replace Kitchen Cabinets in vacant units		7	12,600				
	Replace Bathroom sinks & Install Vanities in vacant units		7	3,150				
	Install new pressure vessel toilets		10	2,750				
	Paint exterior of buildings		20	26,000				
	Replace exterior mechanical doors		50	40,000				
	Replace front and rear exterior doors		10	9,000				
	Paint front and rear exterior doors		100	7,500				
	Replace flooring in vacant units		10	18,000				
	total 1460 - Dwelling Structures			157,000				
	Replace/upgrade Appliances	1465						
	Ranges		5	2,200				
	Refrigerators		10	4,800				
	total 1465 - Dwelling Equipment			7,000				
	Non-Dwelling Equipment	1475						
	Upgrade Computer Equipment & Software			4,000				
	Security Camera System for Community Center		1	40,000				
	total 1475 - Non-Dwelling Equipment			44,000				
	TOTAL SPRINGFIELD			310,000				

Annual Statement/Performance and Evaluation Report								
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)								
Part II: Supporting Pages								
PHA Name: Tallahassee Housing Authority			Grant Type and Number Capital Fund Program Grant No: FL29P073501-08 Replacement Housing Factor Grant No:				Federal FY of Grant: 2008	
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Devel. Acct #	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
FL073000002	Management Improvements	1408						
Orange Avenue	Staff Training in Hud Regulations			2,500				
	Maintenance Skills Training			1,500				
	Resident Initiatives - Drug Intervention/Prevention			50,000				
	total 1408 - Management Improvements			54,000				
	Maintain the grounds to improve safety/health issues and property values	1450						
	Sewer Clean outs		10	3,500				
	Repair/Replace Sidewalks & Parking lots		10	17,500				
	Additional Security Lighting		5	2,400				
	Landscaping		2	10,000				
	Playground - Community Center		1					
	total 1450 - Site Improvement			33,400				
	Maintain the structure to improve safety/health issues and property values	1460						
	Repair/Replace roofs		10	38,000				
	Install shutters on windows		100					
	Replace Bathroom floors for 2 story units - vinyl		10	6,500				
	Refinish kitchen counter tops		10	2,500				
	Replace front and rear exterior doors		10	9,000				
	Paint front and rear exterior doors		100	7,500				
	Replace flooring in vacant units		10	18,000				
	total 1460 - Dwelling Structures			81,500				

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

Part II: Supporting Pages

PHA Name: Tallahassee Housing Authority	Grant Type and Number Capital Fund Program Grant No: FL29P073501-08 Replacement Housing Factor Grant No:	Federal FY of Grant: 2008
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Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Devel. Acct #	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
FL073000002	Replace/upgrade Appliances	1465						
Orange Avenue	Ranges		5	2,200				
	Refrigerators		10	4,800				
	total 1465 - Dwelling Equipment			7,000				
	Non-Dwelling Equipment	1475						
	Upgrade Computer Equipment & Software			4,000				
	Security Camera System		1					
	total 1475 - Non-Dwelling Equipment			4,000				
	TOTAL ORANGE AVENUE			179,900				
FL073000003	Operating Subsidy	1406		50,000				
Pinewood Place +	total 1406 - Operations			50,000				
	Management Improvements	1408						
	Staff Training in Hud Regulations			2,500				
	Maintenance Skills Training			1,500				
	Resident Initiatives - Drug Intervention/Prevention			60,000				
	total 1408 - Management Improvements			64,000				
	Maintain the grounds to improve safety/health issues and property values	1450						
	Restripe parking lot - Pinewood Place		1	1,650				
	Landscaping - Pinewood Place & Hidden Pines			5,000				
	Playground - Pinewood Place		1	13,450				
	total 1450 -Site Improvement			20,100				
FL073000003	Maintain the structure to improve safety/health issues and property values	1460						

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

PHA Name: Tallahassee Housing Authority		Grant Type and Number Capital Fund Program Grant No: FL29P073501-08 Replacement Housing Factor Grant No:				Federal FY of Grant: 2008		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Devel. Acct #	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
Pinewood Place +	Repair/Replace roofs - Pinewood Place		10	38,000				
	Install shutters on windows - Pinewood Place		100					
	Major & Minor renovations for scattered site homes - siding, concrete, roofs, exterior porches/decks, painting etc.		5	67,500				
	Replace exterior mechanical doors - Pinewood Place		50	40,000				
	Replace front and rear exterior doors		10	10,000				
	Paint front and rear exterior doors		100	7,500				
	Replace flooring in vacant units		10	18,000				
	total 1460 - Dwelling Structures			181,000				
	Replace/upgrade Appliances	1465						
	dishwashers		2	496				
	Ranges		5	2,200				
	Refrigerators		10	4,400				
	total 1465 - Dwelling Equipment			7,096				
	Non-Dwelling Equipment	1475						
	Upgrade Computer Equipment & Software			4,000				
	total 1475 - Non-Dwelling Equipment			4,000				
	TOTAL PINWOOD +			326,196				

Annual Statement/Performance and Evaluation Report								
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)								
Part II: Supporting Pages								
PHA Name: Tallahassee Housing Authority			Grant Type and Number Capital Fund Program Grant No: FL29P073501-08 Replacement Housing Factor Grant No:				Federal FY of Grant: 2008	
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Devel. Acct #	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
	total 1406 - Operations			50,000				
	total 1408 - Management Improvements			162,000				
	total 1410 - Administrative Costs			90,955				
	total 1450 - Site Improvement			111,500				
	total 1460 - Dwelling Structures			419,500				
	total 1465 - Dwelling Equipment			21,096				
	total 1475 - Non-Dwelling Equipment			54,500				
	TOTAL CFP501-2008			909,551				

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

PHA Name: Tallahassee Housing Authority		Grant Type and Number Capital Fund Program Grant No: FL29P073501-08 Replacement Housing Factor Grant No:				Federal FY of Grant: 2008	
Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)			All Fund Expended (Quarter Ending Date)			Reasons for Revised
	Original	Revised	Actual	Original	Revised	Actual	
PHA Wide:							
1406 - Operations	09/01/10			09/01/12			
1408 - Man. Improvements	09/01/10			09/01/12			
1410 - Administration	09/01/10			09/01/12			
1430 - Fees & Costs	09/01/10			09/01/12			
1465 - Dwelling Equipment	09/01/10			09/01/12			
1470 - Non-Dwell Struct	09/01/10			09/01/12			
1475 - Non-Dwell Equip	09/01/10			09/01/12			
FL029P073-001 & 003	09/01/10			09/01/12			
FL029P073-002	09/01/10			09/01/12			
FL029P073-004	09/01/10			09/01/12			
FL029P073-006	09/01/10			09/01/12			
FL029P073-015	09/01/10			09/01/12			
FL029P073-016	09/01/10			09/01/12			
FL029P073-017	09/01/10			09/01/12			

*File
O. P. A. A.*

July 9, 2008

Ms. Claudette Cromartie
Tallahassee Housing Authority
2940 Grady Road
Tallahassee, FL 32312

RE: Submission of Written Comments on the Proposed Annual Plan for Fiscal Year 2007-2009

Dear Ms. Cromartie:

Our comments on the Annual Plan focus on the following areas: (1) requirements under the Violence Against Women and Department of Justice Preauthorization Act of 2005 to address the needs of domestic violence survivors in housing programs administered by the public housing agency ("PHA"); (2) services for limited English proficient ("LEP") persons as required by Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, ("Title VI"); its implementing regulations; and Executive Order 13166; (3) public housing operating subsidies; (4) admission issues; (5) continued occupancy issues; (6) public housing vacancies; (7) the Section 3 program; (8) project-based vouchers; and (9) Resident Advisory Board (RAB) membership and outreach activities. We would welcome meeting with THA to respond to any questions or concerns that the agency may have with regard to our comments.

In addition to our comments on the Annual Plan, we would like to take this opportunity to offer the following recommendations with respect to: (1) Future outreach to community-based organizations and other interested parties to encourage broad public participation in THA plans.

Comments on THA's Annual Plan

1. Requirements Under the Violence Against Women and Department of Justice Preauthorization Act of 2005.

On January 5, 2006, President Bush signed into law the Violence Against Women and Department of Justice Preauthorization Act of 2005 (P.L. 109-62), and on August 12, 2006, technical corrects to the Violence Against Women and Department of Justice Preauthorization Act of 2005 (P.L. 109-271) (collectively referred to as "VAWA"). Sections 606 and 607 of VAWA amend the Section 8 and public housing sections of the United States Housing Act of 1937 (42 U.S.C. 1437f and 1437d) such that victims of domestic violence, dating violence, and stalking – as well as their immediate family members - who live in public or Section 8-assisted housing are protected from losing their HUD-assisted housing as a consequence of the abuse committed against the victim. In recognition of the strong link between domestic violence and homelessness, the widespread denial of access to and eviction from HUD-assisted housing to women and families because of their status as domestic

violence survivors, and the lack of emergency and long-term housing opportunities for domestic violence survivors, VAWA seeks to reduce domestic violence and prevent homelessness by protecting the safety of domestic violence survivors in all types of housing and ensuring that they have access to the criminal justice system without jeopardizing their housing.

We are recommending the following more comprehensive policy.

New Provisions Must Be Incorporated into the Administrative Plan and ACOP.

In addition, THA has an obligation to notify owners and managers of housing assisted under project-based Section 8 programs of their rights and obligations with respect to the changes in the law regarding victims of domestic violence. 42 U.S.C. §1437f(ee).

A. Proposed Language of new policy that would also be Included in the Administrative Plan

Definitions. [42U.S.C. §§1437f(f)(8)-(11).]

1. The term “domestic violence” has the same meaning given the term in 42U.S.C. §13925.
2. The term “dating violence” has the same meaning given the term in 42 U.S.C. §13925.
3. The term “stalking” means –
 - 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 of intimate partner of that person.
4. The term “immediate family member” means, 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; or
 - b. any other person living in the household of that person and related to that person by blood or marriage.

Denial of Admission.

That an applicant is or has been a victim of domestic violence, dating violence, or stalking is not an appropriate basis for denial of program assistance or for denial of admission, if the applicant otherwise qualifies for admission. [42U.S.C. §§1437f(c)(9)(A) and (o)(6)(B).]

Nothing in this section shall be construed to supersede any provision of any Federal, State, or local law that provides greater protection than this section for victims of domestic violence, dating violence, or stalking. [42U.S.C. §§1437f(c)(9)(C)(vi) and (o)(6)(B).]

Termination of Assistance

An incident or incidents of actual or threatened domestic violence, dating violence, or stalking shall not be good cause for terminating the assistance of the victim of such violence.

[42U.S.C. §1437f(c)(9)(B).]

The Housing Authority may not terminate assistance to a participant in the voucher program on the basis of an incident or incidents of actual or threatened domestic violence, dating violence, or stalking against that participant. [42U.S.C. §1437f(o)(20)(A).]

Criminal activity directly relating to domestic violence, dating violence, or stalking shall not be considered a serious or repeated violation of the lease by the victim or threatened victim of that criminal activity justifying termination of assistance to the victim or threatened victim.

[42U.S.C. §1437f(o)(20)(B).]

Criminal activity directly relating to domestic violence, dating violence, or stalking shall not be considered cause for termination of assistance for any participant or immediate member of a participant's family who is a victim of the domestic violence, dating violence, or stalking. [42U.S.C. §1437f(o)(20)(C).] Criminal activity directly relating to domestic violence, dating violence, or stalking, 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 assistance, if the tenant or an immediate member of the tenant's family is the victim or threatened victim of that domestic violence, dating violence, or stalking. [42U.S.C. §§1437f(c)(9)(C)(I) and (d)(1)(B)(iii)(I).]

Notwithstanding this provision, or any Federal, State, or local law to the contrary, the Housing Authority may terminate assistance to, or an owner or manager may bifurcate a lease under this provision, or remove a household member from a lease under this provision, without regard to whether the household member is a signatory to a 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 terminating assistance to, or otherwise penalizing, the victim of such violence who is also a tenant or lawful occupant. Such eviction shall be effected in accordance with the procedures prescribed by Federal, State, and local law for the termination of leases or assistance under the relevant program of HUD-Assisted housing. [42U.S.C. §1437f(d)(1)(B)(iii)(II).]

Nothing in this provision may be construed to limit the authority of the Housing Authority to terminate voucher assistance to individuals who engage in criminal acts of physical violence against family members or others. [42U.S.C. §1437f(o)(20)(D)(I).]

Nothing in this provision may be construed to limit the authority of the Housing Authority,

when notified, to honor court orders addressing rights of access or control of the property, including civil protection orders issued to protect the victim and issued to address the distribution or possession of property among the household members in cases where a family breaks up. [42U.S.C. §§1437f(c)(9)(C)(iii), (d)(1)(B)(iii)(III), and (o)(20)(D)(ii).]

Nothing in this provision limits any otherwise available authority of the Housing Authority to terminate assistance to a tenant for any violation of a lease not premised on the act or acts of violence in question against the tenant or a member of the tenant's household, provided that the Housing Authority does not subject an individual who is or has been a victim of domestic violence, dating violence, or stalking to a more demanding standard than other tenants in determining whether to terminate. [42U.S.C. §§1437f(d)(1)(B)(iii)(IV), and (o)(20)(D)(iii).]

Nothing in this provision may be construed to limit the authority of the Housing Authority to terminate assistance to a tenant if the Housing Authority can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property or Housing Authority if that tenant is not evicted or terminated from assistance. [42U.S.C. §§1437f(c)(9)(C)(v), (d)(1)(B)(iii)(V), and (o)(20)(D)(iv).]

Nothing in this section shall be construed to supersede any provision of any Federal, State, or local law that provides greater protection than this section for victims of domestic violence, dating violence, or stalking. [42U.S.C. §§1437f(c)(9)(C)(vi), (d)(1)(B)(iii)(VI), and (o)(20)(D)(v).]

Termination of Tenancy.

An incident or incidents of actual or threatened domestic violence, dating violence, or stalking shall not be construed as a serious or repeated violation of the lease by the victim or threatened victim of that violence and shall not be good cause for terminating the tenancy or occupancy rights of the victim of such violence. [42U.S.C. §1437f(c)(9)(B).]

During the term of a lease under the voucher program, the owner shall not terminate the tenancy except for serious or repeated violation of the terms and conditions of the lease, for violation of applicable Federal, State, or local law, or for other good cause, and an incident or incidents of actual or threatened domestic violence, dating violence, or stalking will not be construed as a serious or repeated violation of the lease by the victim or threatened victim of that violence and will not be good cause for terminating the tenancy or occupancy rights of the victim of such violence. [42U.S.C. §§1437f(d)(B)(ii) and (o)(7)©.]

Criminal activity directly relating to domestic violence, dating violence, or stalking, 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 the tenancy or occupancy rights, if the tenant or an immediate member of the tenant's family is the victim or threatened victim of that domestic violence, dating violence, or stalking. [42U.S.C. §§1437f(c)(9)(C)(I) and (o)(7)(D).] The lease shall provide that, during the term of the lease, criminal activity directly relating to domestic violence, dating violence, or stalking, 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 the tenancy or occupancy rights, if the tenant or an immediate member of the tenant's family is a victim of that domestic violence, dating violence, or stalking. [42U.S.C. § 1437f(d)(B)(iii).]

Notwithstanding this provision, an owner or manager may bifurcate a 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. Such eviction shall be effected in accordance with the procedures prescribed by Federal, State, and local law for the termination of leases or assistance under the relevant program of HUD-assisted housing. [42U.S.C. §§1437f(c)(9)© (ii), (d)(B)(iii)(II), and (o)(7)(D)(ii).]

Nothing in this provision may be construed to limit the authority of an owner or manager, when notified, to honor court orders addressing rights of access to or control of the property, including civil protection orders issued to protect the victim and issued to address the distribution or possession of property among the household members in cases where a family breaks up. [42U.S.C. §§1437f(c)(9)© (iii)(III), (d)(B)(iii)(II), and (o)(7)(D)(iii).]

Nothing in this provision limits any otherwise available authority of an owner or manager to evict a tenant or a member of the tenant's household, provided that the owner or manager does not subject an individual who is or has been a victim of domestic violence, dating violence, or stalking to a more demanding standard than other tenants in determining whether to evict. [42U.S.C. §§1437f(c)(9)© (iv), (d)(B)(iii)(IV), and (o)(7)(D)(iv).]

Nothing in this provision may be construed to limit the authority of an owner or manager to evict any tenant or lawful occupant if the owner or manager can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property if that tenant is not evicted. [42U.S.C. §§1437f(c)(9)© (v), (d)(B)(iii)(V), and (o)(7)(D)(v).]

Nothing in this section shall be construed to supersede any provision of any Federal, State, or local law that provides greater protection than this section for victims of domestic violence, dating violence, or stalking. [42U.S.C. §§1437f(c)(9)© (vi), (d)(B)(iii)(VI), and (o)(7)(D)(vi).]

Portability. [42U.S.C. § 1437f(r)(5).]

A family may not receive a voucher from the Housing Authority and move to another jurisdiction under the tenant-based assistance program if the family has moved out of the assisted dwelling unit of the family in violation of a lease, except that a family may receive a voucher from the Housing Authority and move to another jurisdiction under the tenant-based assistance program if the family has complied with all other obligations of the Section 8 program and has moved out of the assisted dwelling unit in order to protect the health or safety of an individual who is or has been the victim of domestic violence, dating violence, or stalking and who reasonable believed he or she was imminently threatened by harm from further violence if he or she remained in the assisted dwelling unit.

Certification

Where applicable, the owner, manager, or the Housing Authority may request that an individual certify via a HUD approved certification form that the individual is a victim of domestic violence, dating violence, or stalking, and that the incident or incidents in question are bona fide incidents of such actual or threatened abuse and meet the requirements set forth in this Plan. Such certification shall include the name of the perpetrator. The individual shall provide such certification within 14 business days after the individual receives a request for such certification from the owner, manager, or Housing Authority. [42U.S.C. § 1437f(ee)(1)(A).]

If the individual does not provide the certification within 14 business days after the individual receives a request in writing for such certification from the owner, manager, or Housing Authority, nothing in this Plan may be construed to limit the authority of the owner or manager to evict, or the Housing Authority to terminate voucher assistance for, the tenant or lawful occupant that commits violations of a lease. The owner, manager, or Housing Authority may extend the 14-day deadline at their discretion. [42U.S.C. § 1437f(ee)(1)(B).]

An individual may satisfy the certification requirement by –

1. providing the requesting owner, manager, or Housing Authority with documentation signed by an employee, agent, or volunteer of a victim service provider, an attorney, or a medical professional, from whom the victim has sought assistance in addressing domestic violence, dating violence, or stalking, or the effects of the abuse, in which the professional attests under penalty of perjury (28U.S.C. § 1746) to the professional's belief that the incident or incidents in question are bona fide incidents of abuse and the victim of domestic violence, dating violence, or stalking has signed or attested to the documentation; or
2. producing a Federal, State, tribal, territorial, or local police or court record. [42U.S.C. § 1437f(ee)(1)(C).]

Nothing in this section shall be construed to require the owner, manager, or Housing Authority to demand that an individual produce official documentation or physical proof of the individual's status as a victim of domestic violence, dating violence, or stalking in order to receive any of the benefits provided in this Plan. At their discretion, the owner, manager, or Housing Authority may provide benefits to an individual based solely on the individual's statement or other corroborating evidence. [42U.S.C. § 1437f(ee)(1)(D).]

Nothing in this section shall be construed to supersede any provision of any Federal, State, or local law that provides greater protection than this section for victims of domestic violence, dating violence, or stalking. [42U.S.C. § 1437f(ee)(1)(F).]

Confidentiality. [42U.S.C. § 1437f(ee)(2)(A).]

All information provided to the owner, manager, or Housing Authority pursuant to the certification requirement in paragraph ____, including the fact that an individual is a victim of domestic violence,

dating violence, or stalking, shall be retained in confidence by the owner, manager, or Housing Authority, and shall neither be entered into any shared database nor provided to any related entity, except to the extent that disclosure is –

1. requested or consented to by the individual in writing;
2. required for use in an eviction proceeding under 42U.S.C. § 1437f(c)(9),(d)(1)(B)(ii),(d)(1)(B)(iii),(o)(7)©, (o)(7)(D), or (o)(20), or
3. otherwise required by applicable law.

Voucher Program – Notification. [42U.S.C. § 1437f(ee)(1)(B).]

The Housing Authority shall provide notice to tenants assisted under the voucher program of their rights under 42U.S.C. § 1437f(c)(9),(d)(1)(B)(ii),(d)(1)(B)(iii),(o)(7)©, (o)(7)(D), (o)(20), (r)(5), and (ee). Attached hereto are examples of letters which could be sent to voucher tenants and letters that could be sent to owners and managers of project based Section 8 as well as to the residents of such housing, informing them of the rights and responsibilities with respect to treatment of victims of domestic violence. [note this duplicates what I said previously with respect to just the owners and managers. But it may not hurt to say it twice as it is very unusual to have HA have responsibilities with respect to project based Section 8 that is not project based vouchers.]

B. New Proposed Language to Include in the ACOP

Definitions. [42U.S.C. § 1437d(u)(3).]

1. The term “domestic violence” has the same meaning given the term in 42 U.S.C. § 13925.
2. The term “dating violence” has the same meaning given the term in 42 U.S.C. § 13925.
3. The term “stalking” means –
 - 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.
4. The term “immediate family member” means, 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; or

- b. any other person living in the household of that person and related to that person by blood or marriage.

Admission.

The Housing Authority shall not deny admission to the project to any applicant on the basis that the applicant is or has been a victim of domestic violence, dating violence, or stalking if the applicant otherwise qualifies for assistance or admission. [42 U.S.C. § 1437d(c)(3).]

Nothing in this section shall be construed to supersede any provision of any Federal, State, or local law that provides greater protection than this section for victims of domestic violence, dating violence, or stalking. [42 U.S.C. § 1437d(c)(3).]

Termination of Tenancy.

The Housing Authority shall utilize leases that require (I) that the Housing Authority may not terminate the tenancy except for serious or repeated violation of the terms or conditions of the lease or for other good cause and (ii) that an incident or incidents of actual or threatened domestic violence, dating violence, or stalking will not be construed as a serious or repeated violation of the lease by the victim or threatened victim of that violence and will not be good cause for terminating the tenancy or occupancy rights of the victim of such violence. [42 U.S.C. § 1437d(l)(5).]

The Housing Authority shall utilize leases that provide that criminal activity directly relating to domestic violence, dating violence, or stalking, 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 the tenancy or occupancy rights, if the tenant or an immediate member of the tenant's family is a victim of that domestic violence, dating violence, or stalking. [42 U.S.C. § 1437d(l)(6).]

Notwithstanding this provision or any Federal, State, or local law to the contrary, the Housing Authority may bifurcate a lease, or remove a household member from a lease under this section, without regard to whether a household member is a signatory to a lease, in order to evict, remove, terminate occupancy right, 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. [42 U.S.C. § 1437d(l)(6)(B).]

Nothing in this provision may be construed to limit the authority of the Housing Authority, when notified, to honor court orders addressing rights of access to or control of the property, including civil protection orders issued to protect the victim and issued to address the distribution or possession of property among the household members in cases where a family breaks up. [42 U.S.C. § 1437d(l)(6)(C).]

Nothing in this provision limits any otherwise available authority of the Housing Authority to evict a tenant for any violation of a lease not premised on the act or acts of violence in

question against the tenant or a member of the tenant's household, providing that the Housing Authority does not subject an individual who is or has been a victim of domestic violence, dating violence, or stalking to a more demanding standard than other tenants in determining whether to evict or terminate. [42 U.S.C. § 1437d(l)(6)(D).]

Nothing in this provision may be construed to limit the authority of the Housing Authority to terminate the tenancy of any tenant if the Housing Authority can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property if that tenant's tenancy is not terminated. [42 U.S.C. § 1437d(l)(6)(E).]

Nothing in this provision shall be construed to supersede any provision of any Federal, State, or local law that provides greater protection than this section for victims of domestic violence, dating violence, or stalking. [42 U.S.C. § 1437d(l)(6)(F).]

Certification.

Where applicable, the Housing Authority may request that an individual certify via a HUD approved certification form that the individual is a victim of domestic violence, dating violence, or stalking, and that the incident or incidents in question are bona fide incidents of such actual or threatened abuse and meet the requirements set forth in 42 U.S.C. §§ 1437d(1)(5) and (6). Such certification shall include the name of the perpetrator. The individual shall provide such certification within 14 business days after the individual receives a request for such certification from the Housing Authority. [42 U.S.C. § 1437d(u)(1)(A).]

If the individual does not provide the certification within 14 business days after the individual has received a request in writing for such certification from the Housing Authority, nothing in 42 U.S.C. § 1437d(1)(5), (1)(6), or (u) may be construed to limit the authority of the Housing Authority to evict any tenant or lawful occupant who commits violations of a lease. The Housing Authority may extend the 14-day deadline at its discretion. [42 U.S.C. § 1437d(u)(1)(B).]

An individual may satisfy the certification requirement by –

1. providing the Housing Authority with documentation signed by an employee, agent, or volunteer of a victim service provider, an attorney, or a medical professional, from whom the victim has sought assistance in addressing domestic violence, dating violence, or stalking, or the effects of the abuse, in which the professional attests under penalty of perjury (28 U.S.C. § 1746) to the professional's belief that the incident or incidents in question are bona fide incidents of abuse, and the victim of domestic violence, dating violence, or stalking has signed or attested to the documentation; or
2. producing a Federal, State, tribal, territorial, or local policy or court record. [42 U.S.C. § 1437d(u)(1)(C).]

Nothing in this section shall be construed to require the Housing Authority to demand that an individual produce official documentation or physical proof of the individual's status as a victim of

domestic violence, dating violence, or stalking in order to receive any of the benefits provided in 42 U.S.C. § 1437d. At the Housing Authority's discretion, the Housing Authority may provide benefits to an individual based solely on the individual's statement or other corroborating evidence. [42 U.S.C. § 1437d(u)(1)(D).]

Nothing in this section shall be construed to supersede any provision of any Federal, State, or local law that provides greater protection than this section for victims of domestic violence, dating violence, or stalking. [42 U.S.C. § 1437d(u)(1)(E).]

Confidentiality. [42 U.S.C. § 1437d(u)(2)(A).]

All information provided to the Housing Authority pursuant to the certification requirement in paragraph ___, including the fact that an individual is a victim of domestic violence, dating violence, or stalking, shall be retained in confidence by the Housing Authority, and shall neither be entered into any shared database nor provided to any related entity, except to the extent that disclosure is –

1. requested or consented to by the individual in writing;
2. required for use in an eviction proceeding under 42 U.S.C. § 1437f(1)(5) or (6); or
3. otherwise required by applicable law.

Notification. [42 U.S.C. § 1437d(u)(2)(B).]

The Housing Authority shall provide notice to tenants assisted under the public housing program of their rights under 42 U.S.C. §§ 1437d(1)(5) and (6) and 1437d(u), including their right to confidentiality and the limits thereof.

A. Sections of the Administrative Plan and ACOP Must Be Amended to Comply with VAWA.

THA must also carefully review and amend its Section 8 Administrative Plan ("Administrative Plan"), Admissions and Continued Occupancy Policy ("ACOP"), Housing Assistance Payment contracts, and/or lease agreements as described below to ensure that they are consistent with VAWA. We reference below a number of the provisions that must be modified.

Information about VAWA Rights and Obligations

THA has the responsibility of informing all participants, tenants, owners, and managers participating in its programs about the VAWA requirements. 42 U.S.C. §§ 1437d(u)(2)(B) and 1437f(ee)(2)(B); HUD Notice PIH 2006-23 (February 16, 2007). As part of its duty, THA must inform Section 8 Voucher participants of their right to port a voucher between jurisdictions in order to protect the health or safety of an individual who is or has been the victim of domestic violence, dating violence, or stalking and who reasonably believes he or she is imminently threatened by harm from further violence if he or she remains in the assisted dwelling unit. 42 U.S.C. §

1437f(ee)(2)(B). THA should inform participants, tenants, owners, and managers of their rights and obligations under VAWA through initial briefing sessions or other orientation meetings, written materials included in the briefing packets, newsletters produced by THA, re-examination correspondence and interviews, and other appropriate forms of communication. In particular, the provisions of the Administrative Plan regarding portability must be revised to explain that a victim of domestic violence may breach a lease when fleeing the violence and not lose their voucher for failure to provide adequate notice to the landlord or the housing authority.

Contracts

The Housing Assistance Payment Contract between THA and participating owners and managers in the Section 8 Tenant-Based Assistance Housing Choice Voucher Program (as well as contracts in the Section 8 Project-Based Assistance Voucher Program) and the THA Public Housing Lease Agreement, must all explicitly include information on protections for victims of abuse. 42 U.S.C. §§ 1437 f©, (d), (o)(7)©, (o)(7)(D), (o)(20), and 1437d(1)(5) and (6). If it has not already done so, THA should use the most recent revised Voucher Assistance Payments Contract (Form HUD-52641) and Tenancy Addendum (Form HUD-52641-A) (dated 1/2007). HUD Notice PIH 2007-5 (HA) (February 16, 2007). These forms include revisions that reflect the statutory requirements of VAWA. By using the new Voucher Assistance Payments Contract and lease, care should be taken to ensure that no tenant loses their housing because of a landlord's failure to sign the new lease addendum or Voucher Assistance Payments Contract.

Certification of Domestic Violence

As stated in Section 7.5.1 of the Administrative Plan, THA may request that an applicant/participant certify that he or she is victim of domestic violence. The individual may use a Certification of Domestic Violence, Dating Violence, or Stalking (Form HUD-50066) to self-certify that he or she has been a victim of domestic violence. In lieu of such certification, a family member may submit as verification of domestic violence a Federal, State, tribal, territorial, or local policy or court record; or documentation signed by a provided or victim services, an attorney or medical professional, from whom the victim has sought assistance with addressing domestic violence, or the effects of abuse, in which the professional verifies incidents of abuse, and the victim of domestic violence signs or attests to the documentation. However, the obligation of an individual to provide certification or verification of domestic violence does not arise until THA has requested such documentation in writing. Accordingly, sections of the Administrative Plan and/or ACOP dealing with verification of preference, self-certification, verification of non-financial factors, and determination of voucher issuance or admission/continued occupancy for split households must be amended to clarify the policy on collection of information related to domestic violence and reflect these provisions.

Information Shared with Prospective Landlords

The Annual Plan states that THA may share with prospective landlords information regarding prior landlords, if available. To the extent that this statement reflects a policy of requiring tenants to

disclose prior landlords or mandates that the information be shared if available, it may cause serious problems for victims of domestic violence. Creating a trail for an abuser to follow to track down a victim may interfere with the victim seeking housing or may frustrate the victim's use of the portability feature of the program. We recommend that all applicants be informed of the fact that they do not need to reveal prior landlords if they are victims of domestic violence and that information regarding prior landlords, if in the file not be passed on to prospective landlords, if the tenant is a victim of domestic violence, as a reference check may alert the abuser to the whereabouts of the victim.

2. Requirements Under Title VI of the Civil Rights Act of 1964.

Pursuant to section 601 of Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, (Title VI) and its implementing regulations, no person shall "on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." HUD regulations promulgated pursuant to section 602 of Title VI forbid recipients from "utilizing] criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishments of the objectives of the program as respects individuals of a particular race, color, or national origin." 24 C.F.R. § 1.4. Title VI and its implementing regulations require that all recipients of federal financial assistance, including PHAs that receive HUD assistance, such as THA must provide meaningful access of limited English proficient ("LEP") persons. On January 22, 2007, HUD published its "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" ("HUD Final LEP Guidance"). 72 FR 2732. This guidance clarifies legal authority and describes steps that recipients of HUD assistance should take to provide better access to programs and services, including oral interpretation or written translations of important information about their programs, where appropriate.

While most individuals living in the United States read, write, speak and understand English, there are many for whom English is not their primary language. When an individual has a limited ability to read, write, speak or understand English, he or she is considered limited English proficient (LEP). For LEP persons, language can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information relevant to the program, activity or services. In certain circumstances, failure to ensure that LEP persons can effectively participate in, or benefit from, federally-assisted programs and activities may violate the Title VI prohibition against discrimination on the basis of national origin.

The Administrative Plan and ACOP are otherwise silent on the provision of linguistically appropriate services to LEP applicants, participants, and tenants. The following sections describe steps that THA should take to ensure that it is complying with Title VI and its implementing regulations.

A. The Four-Factor Self-Analysis.

All federal funding recipients are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. In its Guidance, HUD has adopted the four-factor analysis, developed initially by the U.S. Department of Justice, as the methodology by which funding recipients determine what reasonable steps are needed to provide meaningful access.

The four-factor test involves a balancing of the following elements:

(1) Number of LEP Persons from a Particular Language Group Eligible to Be Served or Encountered

Persons eligible to be served, or likely to be directly affected by a THA program or activity, are those who are served or encountered in the eligible service population. This population will be program-specific and includes persons who are in the geographic areas that have been approved by HUD as THA jurisdiction or service area. The term "serve" is used to include not only those individuals who are, or should be, subject to the public information missions of THA.

Appendix A to the HUD Final LEP Guidance makes clear that recipients are required by existing regulations to conduct outreach, educate, and affirmatively market the availability of housing and housing-related services to eligible persons that are least likely to apply for and/or receive the program benefits in the geographic area. In many cases, those least likely to apply are LEP persons, and where there are few LEP persons in the immediate geographic area, such outreach, education, and affirmative marketing may require marketing to residents of adjoining areas, communities, or neighborhoods.

There are a variety of sources for demographic information. The Bureau of Census is one potential source. Detailed information about the racial and ethnic populations, including languages, can also be inferred from Department of Education data. Links to the Bureau of the Census, Department of Education, and other demographic data sources can be found at <http://www.lep.gov>. In addition, of course, the documents and experience of THA with applicants and residents/participants is another valuable resource.

(2) Frequency of Contact with LEP Persons.

The more frequent the contact with a particular language group, the more likely that enhanced language services in that language are needed. THA should consider the frequency of different types of language contacts. For example, frequent contacts with Spanish-speaking individuals who are LEP may require certain assistance in Spanish. Less frequent contact with different language groups may suggest a different and less intense solution. If an LEP person accesses a program or service on a daily basis, THA has greater duties than if the same person's frequency of contact with a recipient program or activity is unpredictable or infrequent. Regardless of frequency of contact, THA should consider whether appropriate outreach to LEP persons could increase the frequency of contact with LEP language groups.

(3) Nature and Importance of the Program, Activity or Service to the LEP Individuals.

As a rule of thumb, the more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are required. The HUD Final LEP Guidance recognizes the critical role housing plays in maintaining quality of life. THA should determine whether denial or delay of access to services or information could have serious implications for the LEP individual given the basic purpose for which it was funded. Similarly, THA should consider whether a specific activity is compulsory in order to participate, or to continue to participate, in a program, such as filling out forms, providing certain information, attending briefing sessions, or attending an administrative hearing.

(4) Resources Available, Including Costs of Providing LEP Services.

The level of resources available to THA and the costs that would be imposed may have an impact on the nature of the steps it should take to meet the needs of LEO persons. Regardless, THA has an obligation to carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns. Notwithstanding any decision to limit language services based upon a lack of resources, a THA still has an obligation, under the four-factor analysis, to provide meaningful access to LEP persons.

The HUD Final LEP Guidance is clear that these issues can often be reduced by technological advances, including the sharing of language assistance materials and services among and between recipients, advocacy groups, and federal grant agencies, and by reasonable business practices. Other possible ways to reduce costs include training bilingual staff to act as interpreters and translators, pooling resources, standardizing documents to reduce translation needs, using qualified translators and interpreters to ensure that documents need not be "fixed" later and that inaccurate interpretations do not cause delay or other costs, centralizing interpreter and translator services to achieve economies of scale, or the formalized use of qualified community volunteers.

B. Safe Harbor Provision

The HUD Guidance does not provide a "bright line" rule that clearly describes a recipient's obligation to provide language services in any specific context. While it does offer examples and a Frequently Asked Questions (FAQ) section, even these do not provide the certainty that a recipient might want from the Guidance. In the alternative, the Guidance offers two "safe harbors" which HUD will consider as strong evidence of compliance:

1. When an eligible LEP language group makes up 5% of the population or reaches 1,000 people, whichever is less, "vital" documents must be translated in writing. Translation of other documents, if needed, can be provided orally.
2. When there are fewer than 50 people in an LEP language group that reaches the 5% trigger, written notice must be given of the right to free oral interpretation.

There is no "safe harbor" for oral interpretation. These safe harbor provisions apply to the translation of written documents only. They do not affect the obligation to provide meaningful

access to LEP individuals through competent oral interpreters where the application of the four-factor test leads to the determination that oral language services are needed and are reasonable.

C. Developing a Language Assistance Plan

After completing the four-factor analysis and deciding what language assistance services are appropriate, THA should develop an implementation plan to address the identified needs. A Language Assistance Plan ("LAP") that is developed and periodically updated will be the most cost-effective means of documenting compliance. It establishes a framework for the provision of timely and reasonable language assistance. The HUD Final LEP Guidance recommends that the LAP contain certain topics including: (1) the manner in which the recipient will identify LEP individuals who need language assistance; (2) information about the ways in which language assistance will be provided; (3) staff training; (4) identification of vital documents; and (5) providing notice to LEP individuals. In many ways, a LAP is no different in purpose or scope than a reasonable accommodation policy.

An 18-page "Language Assistance Self-Assessment and Planning Tool for Recipients of Federal Financial Assistance" developed under the auspices of the DOJ and an Interagency Task Force is currently available at <http://www.lep.gov/selfassesstool.pdf>. This fill-in-the-blank and check-off format tool walks federal funding recipients through a series of self-assessment questions and planning considerations, and includes a section that provides a framework for a LAP that is responsible to general Title VI requirements.

D. Vital Documents

A vital document is any document that is critical for ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP persons specifically. Whether a document is "vital" depends upon two factors: the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner. Generally, documents relating to the major purpose of the federal funding will be considered vital. Applications for ancillary programs such as certain recreational programs in public housing, would not generally be considered as vital documents.

On March 1, 2007, HUD held a public meeting to discuss the Guidance and identify documents it considered to be vital. A video of that meeting has been archived and can be accessed through HUD's website.

The Office of Public and Indian Housing has identified the following documents as "vital": the tenancy addendum for the Section 8 voucher program, Housing Assistance Payment contract, Request for tenancy Approval, Authorization for Release of Information, Family Self Sufficiency (FSS) Escrow Account worksheet, Voucher, Statement of Home ownership Obligations, FSS Contract of Participation and the document entitled "A Good Place to Live." HUD has already translated the "How Your Rent is Determined" fact sheet. HUD will translate these documents into Spanish, Vietnamese, Haitian, Creole, Among, French, Chinese, Cambodian, Korean, Arabic,

Russian and Laotian.

For the Office of Multifamily Housing, the only document that is identified as "vital" is the model lease. HUD plans on posting the model lease in 8 languages (Spanish, Chinese, Russian, Vietnamese, Portuguese, Amharic, Korean and French) sometime in the next few months and such leases will include disclaimer language that the translated lease is for informational purposes only. Only the English version of the lease should be executed.

HUD's classification of certain documents notwithstanding, an owner or public housing authority is expected to identify other vital documents that may need to be translated or otherwise communicated in various languages based upon the four factor analysis. For example, a THA's rules and regulations, occupancy rules, warning notices, or eviction notices could be categorized as "vital" and, therefore, would be expected to be translated or interpreted.

There are a number of voluntary compliance agreements on the Fair Housing and Equal Opportunity website involving Title VI compliance reviews. These documents are valuable examples of "vital documents" in programs operated by a public housing authority. In general, in the housing context, any document that has the potential for an adverse impact upon the applicant or tenant should be considered a vital document.

3. Public Housing Operating Subsidies.

We are very concerned about the current and future financial status of public housing administered by the Tallahassee Housing Authority. Operating subsidies for public housing have not been fully funded in prior years as the federal government has been reducing the funding for the agency. The anticipated reduction in operating funds will have an impact on residents and the policies and practices that THA adopts. We are most concerned about the impact on residents, the physical structures and the policies that THA has taken and will continue to have to take to address the funding shortfalls.

For the public housing program, HUD announced last year that under the proposed operating fund rules that THA would have a substantial reduction in funding for operating subsidies. Along with all housing authorities nationwide, THA was funded at 85.5% of the formula last year.

Request for information or action: Please let us know what activities THA has had to defer or delay because of the cuts in operating subsidy funding. It is important that residents and the public are engaged in the process of how THA is dealing with the shortfalls in funding so as to assist in making choices and to assist in seeking funds from other sources. In addition, we would like to know what steps has THA taken, as a decliner agency, to stop the loss of the operating subsidies? Does THA anticipate that it will be in compliance with the rules for conversion to asset management. How has THA grouped the developments or defined them for HUD asset management purposes? Please provide us with a copy of the monthly operating statement for each project. Does THA have any projects which will be considered, non-performing under the HUD asset management criteria? If yes, has THA developed or begun to develop a management plan that addresses the areas of non-performance? Please provide us with copies of those plans for each

applicable project.

7. Section 3

The purpose of Section 3 is to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing federal, state, and local laws and regulations, be directed to low- and very low-income persons, *particularly those who are recipients of government assistance for housing*, and to business concerns which provide economic opportunities to low- and very low-income persons. The implementing regulations set forth numerical goals for hiring and training opportunities for low- and very low-income individuals (30% of new hires must be low- or very low-income individuals of the county) by the recipient of housing and community development funds and any contractors. In addition, the regulation set forth goals for contracting by THA or by its contractors with Section 3 businesses. The goals for contracting with Section 3 businesses are 10% of all contracts for building trades work arising from construction and rehabilitation and 3% for other contracts.

Information or action requested. What are THA Section 3 plans for the coming year? Establishing a mentor program does not indicate the new jobs will be available to resident. Explain with more detail how many new hired does THA anticipate in the coming year? What steps is THA taking to meet the obligation that THA and its contractors ensure that 30% of all new hires are Section 3 persons and that public housing residents get a preference for all jobs derived from federal public housing funding? We would like to know, how many THA staff are Section 3 persons? Attaching to the Annual Plan the HUD Form, 60002, Section 3 Summary Report for 2005, 2006 and 2007, should provide some historical information regarding THA's Section 3 efforts.

Similar questions should be addressed in the Annual Plan with respect to Section 3 businesses. What percentage of THA's contracts went to Section 3 businesses in 2007? What percentage and what is the dollar amount of contracts that are anticipated to go to Section 3 businesses in 2009? What is THA doing to identify and work with Section 3 businesses to increase the number and dollar value of their contracts with THA? Please provide us with a copy of HUD form 2516, contract and subcontract activity, for 2006 and 2007.

8. RAB Membership and Outreach Activities

We would like to work with the THA to obtain more input for the annual plan and five year plans, including outreach on how to reduce electric and other utility costs. We would like to work with THA to increase the use of the centers for each complex, and to get out information on how the centers can be used by residents.

9. We recommend that the minimum rent be reduced to \$25.00 because of the hard economic times and the rise in electric and gas costs.

10. We would like to participate and comment on comprehensive grant allocation of monies.

Sincerely,

Oliver Hill, Sr.
Oliver Hill, Sr.

CAPITAL FUND PROGRAM TABLES

Annual Statement/Performance and Evaluation Report						
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part I:						
Summary						
PHA Name: Tallahassee Housing Authority		Grant Type and Number Capital Fund Program Grant No: FL29P073501-07 Replacement Housing Factor Gran			Federal FY of Grant: 2007	
[X]Original Annual Statement [] Reserve for Disasters/Emergencies [] Revised Annual Statement (revision no:)						
[] Performance and Evaluation Report for Period Ending: [] Final Performance and Evaluation Report						
Line No.	Summary by Development Account	Total Estimated Cost		Total Annual Cost		
		Original	Revised	Obligated	Expended	
1	Total Non-CFP Funds					
2	1406 Operations	0	0	0	0	
3	1408 Management Improvements	145,000	0	131,334	27,952	
4	1410 Administration	85,000	0	85,000	30,370	
5	1411 Audit					
6	1415 Liquidated Damages					
7	1430 Fees and Costs	0	0	0	0	
8	1440 Site Acquisition					
9	1450 Site Improvement	36,000	0	26,037	25,512	
10	1460 Dwelling Structures	315,000	0	180,001	134,182	
11	1465.1 Dwelling Equipment - Nonexpendable	24,000	0	9,337	9,337	
12	1470 Nondwelling Structures	201,948	0	201,935	201,935	
13	1475 Nondwelling Equipment	70,000	0	36,296	36,296	
14	1485 Demolition					
15	1490 Replacement Reserve					
16	1492 Moving to Work Demonstration					
17	1495.1 Relocation Costs					
18	1499 Development Activities	0	0	0	0	
19	1501 Collaterization of Debt Service					
20	1502 Contingency					
21	Amount of Annual Grant: (sum of lines 2- 20)	876,948	0	669,940	465,584	
22	Amount of line 21 Related to LBP Activities	0				
23	Amount of line 21 Related to Section 504 Compliance	0				
24	Amount of line 21 Related to Security - Soft Costs	0				
25	Amount of line 21 Related to Security - Hard Costs	0				
26	Amount of line 21 Related to Energy Conservation Measures	0				

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

PHA Name: Tallahassee Housing Authority		Grant Type and Number Capital Fund Program Grant No: FL29P073501-07 Replacement Housing Factor Grant No:				Federal FY of Grant: 2007		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Devel. Acct #	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
PHA Wide	Operating Subsidy	1406		0				
	total 1406 - Operations			0				
	Staff Training in Hud Regulations	1408		10,000	0	6,334	6,334	
	Maintenance Skills Training	1408		10,000	0	0	0	
	Resident Initiatives - Drug Intervention/Prevention	1408		125,000	0	125,000	21,618	
	total 1408 - Management Improvements			145,000	0	131,334	27,952	
	Executive Director	1410	5%	5,752	0	5,752	1,770	
	Executive Secretary	1410	5%	2,545	0	0	0	
	Capital Funds Coordinator	1410	100%	56,500	0	60,423	20,803	
	Finance Director	1410	5%	3,676	0	3,841	1,174	
	Bookkeeper	1410	5%	1,543	0	0	0	
	Benefits	1410		14,984	0	14,984	6,623	
	total 1410 - Administration			85,000	0	85,000	30,370	
	A & E Fees	1430		0	0	0	0	
	total 1430 - Fees & Costs			0	0	0	0	
	Ranges	1465		12,000	0	0	0	
	Refrigerators	1465		12,000	0	9,337	9,337	
	total 1465 - Dwelling Equipment			24,000	0	9,337	9,337	
	Upgrade Computer Equipment	1475	15	10,000	0	2,576	2,576	
	total 1475 - Non-Dwelling Equipment			10,000	0	2,576	2,576	

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

PHA Name: Tallahassee Housing Authority		Grant Type and Number Capital Fund Program Grant No: FL29P073501-07 Replacement Housing Factor Grant No:				Federal FY of Grant: 2007		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Devel. Acct #	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
FL029P073-001 & 003 Springfield	Maintain the grounds to improve safety/health issues and property values	1450		8,000	0	21,273	21,273	
	total 1450 - Site Improvement			8,000	0	21,273	21,273	
	Repair/Replace roofs	1460	15	35,000	0	15,100	15,100	
	Maintain the structure to improve safety/health issues and property values - performed on vacated units	1460	15	55,000	0	27,480	27,480	
	total 1460 - Dwelling Structures			90,000	0	42,580	42,580	
	Community Center	1470		201,948	0	201,935	201,935	
	total 1470 - Non-Dwelling Structures			201,948	0	201,935	201,935	
	Furnish the Community Center	1475		60,000	0	33,720	33,720	
	total 1475 - Non-Dwelling Equipment			60,000	0	33,720	33,720	
	TOTAL SPRINGFIELD			359,948	0	299,508	299,508	
FL029P073-002 Orange Ave.	Maintain the grounds to improve safety/health issues and property values	1450		8,000	-	-	-	
	total 1450 - Site Improvement			8,000	-	-	-	
	Maintain the structure to improve safety/health issues and property values - performed on vacated units	1460	15	55,000	0	28,490	28,490	
	Roof Repair	1460	7	35,000	0	74,399	28,580	
	total 1460 - Dwelling Structures			90,000	0	102,889	57,070	
	TOTAL ORANGE AVE			98,000	0	102,889	57,070	

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

PHA Name: Tallahassee Housing Authority		Grant Type and Number Capital Fund Program Grant No: FL29P073501-07 Replacement Housing Factor Grant No:				Federal FY of Grant: 2007		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Devel. Acct #	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
FL029P073-006	Maintain the grounds to improve safety/health issues and property values	1450		-	-	399	399	
Pinewood Place	total 1450 - Site Improvement			-	-	399	399	
	Repair Roofs	1460	6	35,000	0	7,850	7,850	
	Maintain the structure to improve safety/health issues and property values - performed on vacated units	1460	7	25,000	0	6,821	6,821	
	total 1460 - Dwelling Structures			60,000	0	14,671	14,671	
	TOTAL PINWOOD PLACE			60,000	0	14,671	14,671	
FL029P073-0015	Maintain the grounds to improve safety/health issues and property values	1450		10,000	-	2,975	2,450	
Scattered Site	total 1450 -Site Improvement			10,000	0	2,975	2,450	
	Maintain the structure to improve safety/health issues and property values - performed on vacated units	1460	2	35,000	0	11,123	11,123	
	total 1460 - Dwelling Structures			35,000	0	11,123	11,123	
	TOTAL SCATTERED SITE 15			45,000	0	14,098	13,573	
FL029P073-0016	Maintain the grounds to improve safety/health issues and property values	1450		10,000	-	1,390	1,390	
Scattered Site	total 1450 -Site Improvement			10,000	0	1,390	1,390	
FL029P073-0016	Maintain the structure to improve safety/health issues and property values - performed on vacated units	1460	2	35,000	0	8,238	8,238	3 of 4
Scattered Site	total 1460 - Dwelling Structures			35,000	0	8,238	8,238	

Annual Statement/Performance and Evaluation Report								
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)								
Part II: Supporting Pages								
PHA Name: Tallahassee Housing Authority			Grant Type and Number Capital Fund Program Grant No: FL29P073501-07 Replacement Housing Factor Grant No:				Federal FY of Grant: 2007	
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Devel. Acct #	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
	TOTAL SCATTERED SITE 16			45,000	0	9,628	9,628	
FL029P073-0017	Maintain the structure to improve safety/health issues and property values - performed on vacated units	1460	1	5,000	0	500	500	
Hidden Pines	total 1460 - Dwelling Structures			5,000	0	500	500	
	TOTAL HIDDEN PINES			5,000	0	500	500	
PHA Wide	total 1406 - Operations			-	-	-	-	
PHA Wide	total 1408 - Management Improvements			145,000	-	131,334	27,952	
PHA Wide	total 1410 - Administration			85,000	-	85,000	30,370	
PHA Wide	total 1430 - Fees & Costs			-	-	-	-	
PHA Wide	total 1465 - Dwelling Equipment			24,000	-	9,337	9,337	
PHA Wide	total 1475 - Non-Dwelling Equipment			10,000	-	2,576	2,576	
FL029P073-001 & 003	TOTAL SPRINGFIELD			359,948	-	299,508	299,508	
FL029P073-002	TOTAL ORANGE AVE			98,000	-	102,889	57,070	
FL029P073-006	TOTAL PINWOOD PLACE			60,000	-	14,671	14,671	
FL029P073-015	TOTAL SCATTERED SITE 15			45,000	-	14,098	13,573	
FL029P073-016	TOTAL SCATTERED SITE 16			45,000	-	9,628	9,628	
FL029P073-017	TOTAL HIDDEN PINES			5,000	-	500	500	
	TOTAL CFP501-2007			876,948	-	669,541	465,185	

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

PHA Name: Tallahassee Housing Authority		Grant Type and Number Capital Fund Program Grant No: FL29P073501-07 Replacement Housing Factor Grant No:					Federal FY of Grant: 2007
Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)			All Fund Expended (Quarter Ending Date)			Reasons for Revised
	Original	Revised	Actual	Original	Revised	Actual	
PHA Wide:							
1406 - Operations	09/01/09			09/01/11			
1408 - Man. Improvements	09/01/09			09/01/11			
1410 - Administration	09/01/09		12/31/07	09/01/11			
1430 - Fees & Costs	09/01/09			09/01/11			
1465 - Dwelling Equipment	09/01/09			09/01/11			
1470 - Non-Dwell Struct	09/01/09			09/01/11			
1475 - Non-Dwell Equip	09/01/09			09/01/11			
FL029P073-001 & 003	09/01/09			09/01/11			
FL029P073-002	09/01/09			09/01/11			
FL029P073-004	09/01/09			09/01/11			
FL029P073-006	09/01/09			09/01/11			
FL029P073-015	09/01/09			09/01/11			
FL029P073-016	09/01/09			09/01/11			
FL029P073-017	09/01/09			09/01/11			

CAPITAL FUND PROGRAM TABLES

Annual Statement/Performance and Evaluation Report						
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part I:						
Summary						
PHA Name: Tallahassee Housing Authority		Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: FL29R07350106			Federal FY of Grant: 2006	
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:)						
<input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending:12/31/07 <input type="checkbox"/> Final Performance and Evaluation Report						
Line No.	Summary by Development Account	Total Estimated Cost		Total Annual Cost		
		Original	Revised	Obligated	Expended	
1	Total Non-CFP Funds					
2	1406 Operations					
3	1408 Management Improvements					
4	1410 Administration					
5	1411 Audit					
6	1415 Liquidated Damages					
7	1430 Fees and Costs					
8	1440 Site Acquisition					
9	1450 Site Improvement					
10	1460 Dwelling Structures					
11	1465.1 Dwelling Equipment - Nonexpendable					
12	1470 Nondwelling Structures					
13	1475 Nondwelling Equipment					
14	1485 Demolition					
15	1490 Replacement Reserve					
16	1492 Moving to Work Demonstration					
17	1495.1 Relocation Costs					
18	1499 Development Activities	181,348				
19	1501 Collaterization of Debt Service					
20	1502 Contingency					
21	Amount of Annual Grant: (sum of lines 2- 20)	181,348				
22	Amount of line 21 Related to LBP Activities					
23	Amount of line 21 Related to Section 504 Compliance					
24	Amount of line 21 Related to Security - Soft Costs					
25	Amount of line 21 Related to Security - Hard Costs					
26	Amount of line 21 Related to Energy Conservation Measures					

CAPITAL FUND PROGRAM TABLES

Annual Statement/Performance and Evaluation Report					
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part I:					
Summary Replacement Housing Factor Grant No: FL29R07350306					
PHA Name:		Grant Type and Number			Federal FY of Grant:
Tallahassee Housing Authority		Capital Fund Program Grant No:			2006
		Replacement Housing Factor Grant No: FL29R07350306			
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending:12/31/2007 <input type="checkbox"/> Final Performance and Evaluation Report					
Line No.	Summary by Development Account	Total Estimated Cost		Total Annual Cost	
		Original	Revised	Obligated	Expended
1	Total Non-CFP Funds				
2	1406 Operations				
3	1408 Management Improvements				
4	1410 Administration				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment - Nonexpendable				
12	1470 Nondwelling Structures				
13	1475 Nondwelling Equipment				
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs				
18	1499 Development Activities	5,358			
19	1501 Collaterization of Debt Service				
20	1502 Contingency				
21	Amount of Annual Grant: (sum of lines 2- 20)	5,358			
22	Amount of line 21 Related to LBP Activities				
23	Amount of line 21 Related to Section 504 Compliance				
24	Amount of line 21 Related to Security - Soft Costs				
25	Amount of line 21 Related to Security - Hard Costs				
26	Amount of line 21 Related to Energy Conservation Measures				

CAPITAL FUND PROGRAM TABLES

Annual Statement/Performance and Evaluation Report					
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part I:					
Summary					
PHA Name: Tallahassee Housing Authority		Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: FL29R07350107			Federal FY of Grant: 2007
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:)					
<input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending:12/31/2007 <input type="checkbox"/> Final Performance and Evaluation Report					
Line No.	Summary by Development Account	Total Estimated Cost		Total Annual Cost	
		Original	Revised	Obligated	Expended
1	Total Non-CFP Funds				
2	1406 Operations				
3	1408 Management Improvements				
4	1410 Administration				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment - Nonexpendable				
12	1470 Nondwelling Structures				
13	1475 Nondwelling Equipment				
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs				
18	1499 Development Activities	174,395			
19	1501 Collaterization of Debt Service				
20	1502 Contingency				
21	Amount of Annual Grant: (sum of lines 2- 20)	174,395			
22	Amount of line 21 Related to LBP Activities				
23	Amount of line 21 Related to Section 504 Compliance				
24	Amount of line 21 Related to Security - Soft Costs				
25	Amount of line 21 Related to Security - Hard Costs				
26	Amount of line 21 Related to Energy Conservation Measures				

