

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

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# PHA Plans

5 Year Plan for Fiscal Years 2005 – 2009  
(2008-2012)

Annual Plan for Fiscal Year 2008

Benton Township Housing Commission

MI 032

mi032v01.doc

**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:** Benton Township Housing Commission      **PHA Number:** MI 032

**PHA Fiscal Year Beginning:** 10/2008

**PHA Programs Administered:**

**Public Housing and Section 8**       **Section 8 Only**       **Public Housing Only**  
 Number of public housing units: 300      Number of S8 units:      Number of public housing units:  
 Number of S8 units: 75

**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 2008 - 2012**  
[24 CFR Part 903.5]

**A. Mission**

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

- The mission of the PHA is the same as that of the Department of Housing and Urban Development: To promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination.
- The PHA's mission is:  
The mission of the Benton Township Housing Commission is to serve the citizens of Blossom Acres and Plaza Manor by:
1. Providing affordable housing opportunities in a safe environment.
  2. Revitalizing and maintaining neighborhoods and strong urban core.
  3. Forming effective partnerships to maximize social and economic opportunities.
- The mission shall be accomplished by a fiscally responsible, creative organization committed to excellence in public service.

**B. Goals**

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

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

- PHA Goal: Expand the supply of assisted housing  
Objectives:
- Apply for additional rental vouchers:
  - Reduce public housing vacancies:
  - Leverage private or other public funds to create additional housing opportunities:
  - Acquire or build units or developments
  - Other (list below)
- PHA Goal: Improve the quality of assisted housing

Objectives:

- Improve public housing management: (PHAS score)
- Improve voucher management: (SEMAP score)
- Increase customer satisfaction:
- Concentrate on efforts to improve specific management functions:  
(list; e.g., public housing finance; voucher unit inspections)
- Renovate or modernize public housing units:
- Demolish or dispose of obsolete public housing:
- Provide replacement public housing:
- Provide replacement vouchers:
- Other: (list below)

- PHA Goal: Increase assisted housing choices

Objectives:

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

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

- PHA Goal: Provide an improved living environment

Objectives:

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

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

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

Objectives:

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

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

PHA Goal: Ensure equal opportunity and affirmatively further fair housing

Objectives:

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

**Other PHA Goals and Objectives: (list below)**

**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 Benton Township Housing Commission (BTHC) is a Standard-Performer agency located in Berrien County, Michigan. The BTHC manages 300 public housing units in two developments.

The BTHC will accomplish its mission ideals through its goals and objectives:

1. Providing decent, safe and affordable housing in the Benton Charter Township community.
2. The housing commission shall ensure equal treatment of all applicants, residents, tenant-based participants, employees and vendors.
3. Enhance the image of public housing in our community.
4. Improve access of public housing residents to services that support economic opportunity and quality of life.
5. Improve resident and community perception of safety and security in the housing commission developments.
6. Increase resident participation through resident councils and /or advisory committee.

The following language has been incorporated into both the ACOP and Section 8 Administration Plan regarding our VAWA Policy. The BTHC shall not deny admission 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.

### **iii. Annual Plan Table of Contents**

[24 CFR Part 903.7 9 (r)]

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

#### **Table of Contents**

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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:

<input checked="" type="checkbox"/>	(A) Admissions Policy for Deconcentration	39
<input checked="" type="checkbox"/>	(B) FY 2008 Capital Fund Program Annual Statement	40
<input type="checkbox"/>	Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)	
<input checked="" type="checkbox"/>	(G) List of Resident Advisory Board Members	49
<input checked="" type="checkbox"/>	(F) List of Resident Board Member	48
<input checked="" type="checkbox"/>	(J) Community Service Description of Implementation	52
<input checked="" type="checkbox"/>	(K, L) Information on Pet Policy	54, 56
<input type="checkbox"/>	Section 8 Homeownership Capacity Statement, if applicable	
<input type="checkbox"/>	Description of Homeownership Programs, if applicable	

#### Optional Attachments:

<input checked="" type="checkbox"/>	PHA Management Organizational Chart	mi032a01
<input checked="" type="checkbox"/>	(C) Capital Fund Program 5 Year Action Plan	43

- ( ) Public Housing Drug Elimination Program (PHDEP) Plan
- ( ) Comments of Resident Advisory Board or Boards (must be attached if not included in PHA Plan text)
- Other (List below, providing each attachment name)
  - Attachment D Criteria for Substantial Deviation and Significant Amendments 46
  - Attachment E: Summary of Policy and Program Changes 47
  - Attachment H: Progress in meeting the 5-year plan mission and goals 50
  - Attachment I: Component 3, (6) Deconcentration and Income Mixing 51
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  - Attachment Q: FY 2004 Performance and Evaluation Report 70
  - Attachment R: VAWA Policy mi032b01

**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.

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
YES	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations	5 Year and Annual Plans
YES	State/Local Government Certification of Consistency with the Consolidated Plan	5 Year and Annual Plans
YES	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
YES	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
YES	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources;
YES	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
YES	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
YES	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
YES	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
YES	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
YES	Section 8 rent determination (payment standard) policies <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
YES	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation)	Annual Plan: Operations and Maintenance
YES	Public housing grievance procedures <input checked="" type="checkbox"/> check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
YES	Section 8 informal review and hearing procedures <input checked="" type="checkbox"/> check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
YES	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant year	Annual Plan: Capital Needs
N/A	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant	Annual Plan: Capital Needs
YES	Most recent, approved 5 Year Action Plan for the Capital Fund/Comprehensive Grant Program, if not included as an attachment (provided at PHA option)	Annual Plan: Capital Needs
N/A	Approved HOPE VI applications or, if more recent, approved or submitted HOPE VI Revitalization Plans or any other approved proposal for development of public housing	Annual Plan: Capital Needs
N/A	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition
N/A	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing
N/A	Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act	Annual Plan: Conversion of Public Housing
N/A	Approved or submitted public housing homeownership	Annual Plan:

<b>List of Supporting Documents Available for Review</b>		
<b>Applicable &amp; On Display</b>	<b>Supporting Document</b>	<b>Applicable Plan Component</b>
	programs/plans	Homeownership
N/A	Policies governing any Section 8 Homeownership program <input type="checkbox"/> check here if included in the Section 8 Administrative Plan	Annual Plan: Homeownership
N/A	Any cooperative agreement between the PHA and the TANF agency	Annual Plan: Community Service & Self-Sufficiency
N/A	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
N/A	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
N/A	The most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h)), the results of that audit and the PHA's response to any findings	Annual Plan: Annual Audit
N/A	Troubled PHAs: MOA/Recovery Plan	Troubled PHAs
YES	Other supporting documents (optional) Pet Policy	Annual Plan: Pet Policy
YES	Policies on Violence Against Women and Justice Department Reauthorization Act 2005 <input checked="" type="checkbox"/> Check here if included in Section 8 Administrative Plan.	Annual Plan: Eligibility, Selection, and Admissions Policies

## **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.

<b>Housing Needs of Families in the Jurisdiction by Family Type</b>							
<b>Family Type</b>	<b>Overall</b>	<b>Afford-ability</b>	<b>Supply</b>	<b>Quality</b>	<b>Access-ibility</b>	<b>Size</b>	<b>Loca-tion</b>
Income <= 30% of AMI	96	4	3	3	4	3	3
Income >30% but <=50% of AMI	46	5	3	2	3	3	3
Income >50% but <80% of AMI	2	4	3	3	3	3	2
Elderly	12	4	3	3	3	3	3
Families with	4	5	5	4	3	3	3

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Loca-tion
Disabilities							
Race/Ethnicity	10	4	4	4	3	3	3
Race/Ethnicity	1	5	5	4	3	3	3
Race/Ethnicity	96	5	5	4	3	3	3
Race/Ethnicity							

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

- Consolidated Plan of the Jurisdiction/s  
Indicate year: 2005
- U.S. Census data: the Comprehensive Housing Affordability Strategy (“CHAS”) dataset
- American Housing Survey data  
Indicate year:
- Other housing market study  
Indicate year:
- Other sources: (list and indicate year of information)

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

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

Housing Needs of Families on the Waiting List			
Waiting list type: (select one)			
<input type="checkbox"/>	Section 8 tenant-based assistance		
<input checked="" type="checkbox"/>	Public Housing		
<input type="checkbox"/>	Combined Section 8 and Public Housing		
<input type="checkbox"/>	Public Housing Site-Based or sub-jurisdictional waiting list (optional)		
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	272		124
Extremely low income <=30% AMI	232	85	
Very low income (>30% but <=50% AMI)	35	13	
Low income (>50% but <80% AMI)	5	2	

<b>Housing Needs of Families on the Waiting List</b>			
Families with children	113	42	
Elderly families	42	15	
Families with Disabilities	15	6	
Race/ethnicity Black	231	85	
Race/ethnicity White	41	15	
Race/ethnicity			
Race/ethnicity			
Characteristics by Bedroom Size (Public Housing Only)			
1 BR	147	54	50
2 BR	90	33	36
3 BR	34	12.6	32
4 BR	1	.4	6
5 BR	0		
5+ BR			
Is the waiting list closed (select one)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			
If yes:			
How long has it been closed (# of months)?			
Does the PHA expect to reopen the list in the PHA Plan year? <input type="checkbox"/> No <input type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input type="checkbox"/> No <input type="checkbox"/> Yes			

<b>Housing Needs of Families on the Waiting List</b>			
Waiting list type: (select one)			
<input checked="" type="checkbox"/> Section 8 tenant-based assistance			
<input type="checkbox"/> Public Housing			
<input type="checkbox"/> Combined Section 8 and Public Housing			
<input type="checkbox"/> Public Housing Site-Based or sub-jurisdictional waiting list (optional)			
If used, identify which development/subjurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	850		12
Extremely low income <=30% AMI	661	78	
Very low income (>30% but <=50% AMI)	173	20	
Low income (>50% but <80% AMI)	16	2	
Families with children	564	66	
Elderly families	64	8	
Families with Disabilities	26	3	

<b>Housing Needs of Families on the Waiting List</b>			
Race/ethnicity Black	820	96.4	
Race/ethnicity White	28	3.3	
Race/ethnicity Hispanic	2	.3	
Race/ethnicity			
Characteristics by Bedroom Size (Public Housing Only)			
1 BR			
2 BR			
3 BR			
4 BR			
5 BR			
5+ BR			
Is the waiting list closed (select one)? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes			
If yes:			
How long has it been closed (# of months)? 21 months			
Does the PHA expect to reopen the list in the PHA Plan year? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			
Does the PHA permit specific categories of families onto the waiting list, even if generally closed? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes			

### C. Strategy for Addressing Needs

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

#### (1) Strategies

**Need: Shortage of affordable housing for all eligible populations**

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

Select all that apply

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

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

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

Select all that apply

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

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

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

Select all that apply

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

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

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

Select all that apply

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

**Need: Specific Family Types: The Elderly**

**Strategy 1: Target available assistance to the elderly:**

Select all that apply

- Seek designation of public housing for the elderly
- Apply for special-purpose vouchers targeted to the elderly, should they become available

Other: (list below)

**Need: Specific Family Types: Families with Disabilities**

**Strategy 1: Target available assistance to Families with Disabilities:**

Select all that apply

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

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

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

Select if applicable

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

**Strategy 2: Conduct activities to affirmatively further fair housing**

Select all that apply

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

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

**(2) Reasons for Selecting Strategies**

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

- Funding constraints
- Staffing constraints
- Limited availability of sites for assisted housing
- Extent to which particular housing needs are met by other organizations in the community

- Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA
- Influence of the housing market on PHA programs
- Community priorities regarding housing assistance
- Results of consultation with local or state government
- Results of consultation with residents and the Resident Advisory Board
- Results of consultation with advocacy groups
- Other: (list below)

## **2. Statement of Financial Resources**

[24 CFR Part 903.7 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.

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>1. Federal Grants (FY 2008 grants)</b>		
a) Public Housing Operating Fund	809,708	
b) Public Housing Capital Fund	501,714	
c) HOPE VI Revitalization	N/A	
d) HOPE VI Demolition	N/A	
e) Annual Contributions for Section 8 Tenant-Based Assistance	443,446	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)	N/A	
g) Resident Opportunity and Self-Sufficiency Grants	N/A	
h) Community Development Block Grant	N/A	
i) HOME	N/A	
Other Federal Grants (list below)		
<b>2. Prior Year Federal Grants (unobligated funds only) (list below)</b>		
2007 CFP	441,640	
<b>3. Public Housing Dwelling Rental Income</b>	660,000	

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>4. Other income</b> (list below)	33,000	
Excess utility, interest, & maintenance charges		
<b>5. Non-federal sources</b> (list below)	0	
<b>Total resources</b>	2,889,508	

### **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: (3)
- When families are within a certain time of being offered a unit: (state time)
- Other:

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

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

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

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

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

##### **(2)Waiting List Organization**

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

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

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

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

c. If the PHA plans to operate one or more site-based waiting lists in the coming year, answer each of the following questions; if not, skip to subsection **(3) Assignment**

1. How many site-based waiting lists will the PHA operate in the coming year? NONE

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

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

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

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

**(3) Assignment**

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

- One
- Two
- Three or More

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

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

**(4) Admissions Preferences**

a. Income targeting:

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

b. Transfer policies:

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

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

c. Preferences

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

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

Former Federal preferences:

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

Other preferences: (select below)

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

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:

- 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)

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

f. Relationship of preferences to income targeting requirements:

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

#### **(5) Occupancy**

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

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

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

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

Other (list)

**(6) Deconcentration and Income Mixing**

a.  Yes  No: Did the PHA's analysis of its family (general occupancy) developments to determine concentrations of poverty indicate the need for measures to promote deconcentration of poverty or income mixing?

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

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

Adoption of site based waiting lists  
If selected, list targeted developments below:

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

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

Other (list policies and developments targeted below)

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

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

- Additional affirmative marketing
- Actions to improve the marketability of certain developments
- Adoption or adjustment of ceiling rents for certain developments
- Adoption of rent incentives to encourage deconcentration of poverty and income-mixing
- Other (list below)

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

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

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:  
(Blossom Acres and Plaza Manor)

## B. Section 8

Exemptions: PHAs that do not administer section 8 are not required to complete sub-component 3B.

**Unless otherwise specified, all questions in this section apply only to the tenant-based section 8 assistance program (vouchers, and until completely merged into the voucher program, certificates).**

### (1) Eligibility

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

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

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

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

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

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

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

### (2) Waiting List Organization

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

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

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

- PHA main administrative office  
 Other (list below)

**(3) Search Time**

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

If yes, state circumstances below:

**(4) Admissions Preferences**

a. Income targeting

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

b. Preferences

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

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

Former Federal preferences

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

Other preferences (select all that apply)

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

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

1      Date and Time

Former Federal preferences

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)

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

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

- Through published notices
- Other (list below)

#### **4. PHA Rent Determination Policies**

[24 CFR Part 903.7 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:

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

1.  Yes  No: Does the PHA plan to charge rents at a fixed amount or percentage less than 30% of adjusted income?
2. If yes to above, list the amounts or percentages charged and the circumstances under which these will be used below:

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

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

e. Ceiling rents

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

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

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

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

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

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

f. Rent re-determinations:

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

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

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

**(2) Flat Rents**

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

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

**B. Section 8 Tenant-Based Assistance**

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

**(1) Payment Standards**

Describe the voucher payment standards and policies.

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

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

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

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

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

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

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

- Annually
- Other (list below)

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

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

## **(2) Minimum Rent**

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

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

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

## **5. 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. (mi032a01)
- A brief description of the management structure and organization of the PHA follows:

### **B. HUD Programs Under PHA Management**

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

<b>Program Name</b>	<b>Units or Families Served at Year Beginning</b>	<b>Expected Turnover</b>
Public Housing	301	58
Section 8 Vouchers	75	8
Section 8 Certificates		
Section 8 Mod Rehab		
Special Purpose Section 8 Certificates/Vouchers (list individually)		
Public Housing Drug Elimination Program (PHDEP)		
Other Federal Programs(list individually)		
HOP		

### **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)  
ACOP, Procurement Policy, Maintenance Policy, Maintenance Policy, Personnel Policy, Asset Disposition Policy
- (2) Section 8 Management: (list below)  
Administration Plan

## **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)

## **7. Capital Improvement Needs**

[24 CFR Part 903.7 9 (g)]

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

### **A. Capital Fund Activities**

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

#### **(1) Capital Fund Program Annual Statement**

Using parts I, II, and III of the Annual Statement for the Capital Fund Program (CFP), identify capital activities the PHA is proposing for the upcoming year to ensure long-term physical and social viability of its

public housing developments. This statement can be completed by using the CFP Annual Statement tables provided in the table library at the end of the PHA Plan template **OR**, at the PHA's option, by completing and attaching a properly updated HUD-52837.

Select one:

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

-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 (C)

-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  No: e) Will the PHA be conducting any other public housing development or replacement activities not discussed in the Capital Fund Program Annual Statement?  
If yes, list developments or activities below:

### **8. Demolition and Disposition**

[24 CFR Part 903.7 9 (h)]

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

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

#### 2. Activity Description

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

<b>Demolition/Disposition Activity Description</b>
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  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.

<b>Designation of Public Housing Activity Description</b>	
1a. Development name: Plaza Manor	
1b. Development (project) number: MI 32-2	
2. Designation type:	
Occupancy by only the elderly	<input checked="" 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 checked="" type="checkbox"/>
4. Date this designation <u>approved</u> , submitted, or <b>planned for submission</b> :	(12/31/08)
5. If approved, will this designation constitute a (select one)	
<input checked="" type="checkbox"/> New Designation Plan	
<input type="checkbox"/> Revision of a previously-approved Designation Plan?	

6. Number of units affected: 100
7. Coverage of action (select one)
- Part of the development
- Total development

## **10. Conversion of Public Housing to Tenant-Based Assistance**

[24 CFR Part 903.7 9 (j)]

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

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

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

#### 2. Activity Description

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

<b>Conversion of Public Housing Activity Description</b>
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)]

**A. Public Housing**

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

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

2. Activity Description

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

**Public Housing Homeownership Activity Description  
(Complete one for each development affected)**

- 1a. Development name: -  
1b. Development (project) number:

<p>2. Federal Program authority:</p> <p><input type="checkbox"/> HOPE I</p> <p><input type="checkbox"/> 5(h)</p> <p><input type="checkbox"/> Turnkey III</p> <p><input type="checkbox"/> Section 32 of the USHA of 1937 (effective 10/1/99)</p>
<p>3. Application status: (select one)</p> <p><input type="checkbox"/> Approved; included in the PHA's Homeownership Plan/Program</p> <p><input type="checkbox"/> Submitted, pending approval</p> <p><input type="checkbox"/> Planned application</p>
<p>4. Date Homeownership Plan/Program approved, submitted, or planned for submission: ( _____ )</p>
<p>5. Number of units affected:</p> <p>6. Coverage of action: (select one)</p> <p><input type="checkbox"/> Part of the development</p> <p><input type="checkbox"/> Total development</p>

## 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:

#### a. Size of Program

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

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

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

#### b. PHA-established eligibility criteria

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

If yes, list criteria below:

## **12. PHA Community Service and Self-sufficiency Programs**

[24 CFR Part 903.7 9 (1)]

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 has 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? DD/MM/YY  
08/01/2001

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

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

### **B. Services and programs offered to residents and participants**

#### **(1) General**

a. Self-Sufficiency Policies

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

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

b. Economic and Social self-sufficiency programs

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

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)

**(2) Family Self Sufficiency program/s**

a. Participation Description

Family Self Sufficiency (FSS) Participation		
Program	Required Number of Participants (start of FY 2004 Estimate)	Actual Number of Participants (As of: DD/MM/YY)
Public Housing		
Section 8		

b.  Yes  No: If the PHA is not maintaining the minimum program size required by HUD, does the most recent FSS Action Plan address the steps the PHA plans to take to achieve at least the minimum program size?

If no, list steps the PHA will take below:

**C. Welfare Benefit Reductions**

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

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

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

**13. PHA Safety and Crime Prevention Measures**

[24 CFR Part 903.7 9 (m)]

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

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

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

- High incidence of violent and/or drug-related crime in some or all of the PHA's developments
- High incidence of violent and/or drug-related crime in the areas surrounding or adjacent to the PHA's developments
- Residents fearful for their safety and/or the safety of their children
- Observed lower-level crime, vandalism and/or graffiti
- People on waiting list unwilling to move into one or more developments due to perceived and/or actual levels of violent and/or drug-related crime
- Other (describe below)

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

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

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

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

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

- Contracting with outside and/or resident organizations for the provision of crime-and/or drug-prevention activities
- Crime Prevention Through Environmental Design

- Activities targeted to at-risk youth, adults, or seniors
- Volunteer Resident Patrol/Block Watchers Program
- Other (describe below)

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

**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)

**D. Additional information as required by PHDEP/PHDEP Plan**

PHAs eligible for FY 2002 PHDEP funds must provide a PHDEP Plan meeting specified requirements prior to receipt of PHDEP funds.

- Yes  No: Is the PHA eligible to participate in the PHDEP in the fiscal year covered by this PHA Plan?
- Yes  No: Has the PHA included the PHDEP Plan for FY 2002 in this PHA Plan?
- Yes  No: This PHDEP Plan is an Attachment. (Attachment Filename: )

**14. RESERVED FOR PET POLICY**

[24 CFR Part 903.7 9 (n)]

**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.  Yes  No: Is the PHA required to have an audit conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U.S.C. 1437c(h))? (If no, skip to component 17.)
- 2.  Yes  No: Was the most recent fiscal audit submitted to HUD?

3.  Yes  No: Were there any findings as the result of that audit?
4.  Yes  No: If there were any findings, do any remain unresolved?  
If yes, how many unresolved findings remain? one
5.  Yes  No: Have responses to any unresolved findings been submitted to HUD?  
If not, when are they due (state below)?

## **17. PHA Asset Management**

[24 CFR Part 903.7 9 (q)]

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

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

## **18. Other Information**

[24 CFR Part 903.7 9 (r)]

### **A. Resident Advisory Board Recommendations**

1.  Yes  No: Did the PHA receive any comments on the PHA Plan from the Resident Advisory Board/s?
2. If yes, the comments are: (if comments were received, the PHA **MUST** select one)
- Attached at Attachment (File name)
- Provided below:  
Board was in general agreement with policies and other Agency Plan documents.
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: City of Benton Township, Michigan
2. The PHA has taken the following steps to ensure consistency of this PHA Plan with the Consolidated Plan for the jurisdiction: (select all that apply)
- The PHA has based its statement of needs of families in the jurisdiction on the needs expressed in the Consolidated Plan/s.

- The PHA has participated in any consultation process organized and offered by the Consolidated Plan agency in the development of the Consolidated Plan.
  - The PHA has consulted with the Consolidated Plan agency during the development of this PHA Plan.
  - Activities to be undertaken by the PHA in the coming year are consistent with the initiatives contained in the Consolidated Plan. (list below)
  
  - 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.

### **Deconcentration**

It is Benton Township Housing Commission's policy to provide for deconcentration of poverty and encourage income mixing by bringing higher income families into lower income developments and lower income families into higher income developments. Toward this end, we will skip families on the waiting list to reach other families with a lower or higher income. We will accomplish this in a uniform and non-discriminating manner.

The Benton Township Housing Commission will affirmatively market our housing to all eligible income groups. Lower income residents will not be steered toward lower income developments and higher income people will not be steered toward higher income developments.

Prior to the beginning of each fiscal year, we will analyze the income levels of families residing in each of our developments, the income levels of census tracts in which our development is located, and the income levels of the families on the waiting list. Based on this analysis, we will determine the level of marketing strategies and deconcentration incentives to implement.

The Benton Township Housing Commission may offer one or more incentives to encourage applicant families whose income classification would help to meet the deconcentration goals of a particular development. Various incentives may be used at different times, or under different conditions, but will always be provided in a consistent and nondiscriminatory manner.

**Required Attachment B**

**Annual Statement/Performance and Evaluation Report  
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary**

<b>PHA Name:</b> Benton Township Housing Commission	<b>Grant Type and Number</b> Capital Fund Program Grant No: MI33P032501-08 Replacement Housing Factor Grant No:	<b>Federal FY of Grant:</b> 2008
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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 Actual Cost	
		Original	Revised	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations	50,000			
3	1408 Management Improvements	37,000			
4	1410 Administration	50,000			
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	37,000			
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	327,714			
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Nondwelling Structures				
13	1475 Nondwelling Equipment				
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs				
18	1499 Development Activities				
19	1502 Contingency				
20					
21	Amount of Annual Grant: (sum of lines 1-19..)	501,714			
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				
27	Collateralization Expenses or Debt Service				

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

PHA Name: <b>Benton Township Housing Commission</b>		Grant Type and Number Capital Fund Program Grant No: MI33P032501-08 Replacement Housing Factor Grant No:				Federal FY of Grant: 2008			
Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
					Original	Revised	Funds Obligated	Funds Expended	
HA Wide Operations	A. Housing Operations		1406	10%	50,000				
	<b>Sub total</b>				<b>50,000</b>				
HA Wide Management Improvements	A. Resident programs		1408	100%	5,000				
	B. Commissioner training		1408	5	2,500				
	C. Staff training		1408	2	2,500				
	D. Computer training		1408	3	5,000				
	E. Family Investment Center Operations		1408	50%	22,000				
	<b>Sub total</b>				<b>37,000</b>				
HA Wide Administration	A. Partial salary/benefits of staff involved in CFP		1410	10%	50,000				
	<b>Sub total</b>				<b>50,000</b>				
HA Wide Fees and Cost	A. A/E services		1430	100%	30,000				
	B. Consulting fees		1430	100%	7,000				
	<b>Sub total</b>				<b>37,000</b>				
MI 32-1	A. Continue renovating bathrooms		1460	65 Units	327,714				
	<b>Sub total</b>				<b>327,714</b>				
	<b>Grand total</b>				<b>501,714</b>				



**Required Attachment C**

**Capital Fund Program Five-Year Action Plan**

**Part I: Summary**

PHA Name <b>Benton Township Housing Commission</b>	Benton Township/Berrien County/Michigan	<input checked="" type="checkbox"/> <b>Original 5-Year Plan</b> <input type="checkbox"/> <b>Revision No:</b>
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Development Number/Name/HA-Wide	Year 1	Work Statement for Year 2 FFY Grant: PHA FY: 2009	Work Statement for Year 3 FFY Grant: PHA FY: 2010	Work Statement for Year 4 FFY Grant: PHA FY: 2011	Work Statement for Year 5 FFY Grant: PHA FY: 2012
	Annual Statement				
HA Wide Ops		50,000	50,000	50,000	50,000
HA Wide Mgt Imp		37,000	37,000	37,000	37,000
HA Wide Other		87,000	87,000	87,000	87,000
MI 32-1		232,714	202,714	327,714	195,000
MI 32-2		95,000	125,000	0	132,714
HA Wide Nondwelling		0	0	0	0
Total CFP Funds (Est.)		501,714	501,714	501,714	501,714
Total Replacement Housing Factor Funds					

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

Activities for Year 1	Activities for Year : 2 FFY Grant: PHA FY: 2009			Activities for Year: 3 FFY Grant: PHA FY: 2010		
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
See	<b>HA Wide Operations</b>	A. Housing Operations	50,000	<b>HA Wide Operations</b>	A. Housing Operations	50,000
Annual Statement		<b>Sub Total</b>	<b>50,000</b>		<b>Sub Total</b>	<b>50,000</b>
	<b>HA Wide Management Improvements</b>	A. Resident programs	5,000	<b>HA Wide Management Improvements</b>	A. Resident programs	5,000
		B. Commissioner training	2,500		B. Commissioner training	2,500
		C. Staff training	2,500		C. Staff training	2,500
		D. Computer upgrades	5,000		D. Computer upgrades	5,000
		E. Family Investment Center	22,000		E. Family Investment Center	22,000
		<b>Sub Total</b>	<b>37,000</b>		<b>Sub Total</b>	<b>37,000</b>
	<b>HA Wide Admin Cost</b>	A. Partial Salary & benefits to staff working with CFP	50,000	<b>HA Wide Admin Cost</b>	A. Partial Salary & benefits to staff working with CFP	50,000
		<b>Sub Total</b>	<b>50,000</b>		<b>Sub Total</b>	<b>50,000</b>
	<b>HA Wide Fees &amp; Cost</b>	A. A/E Services	30,000	<b>HA Wide Fees &amp; Cost</b>	A. A/E Services	30,000
		B. Consulting Service	7,000		B. Consulting Service	7,000
		<b>Sub Total</b>	<b>37,000</b>		<b>Sub Total</b>	<b>37,000</b>
	<b>MI 32-1</b>	A. Complete renovate bathrooms	162,714	<b>MI 32-1</b>	A. Renovate kitchen	152,714
		B. Clean & tuck-point brick	50,000		B. Replace street lights	50,000
		C. Replace maintenance vehicle	20,000		<b>Sub Total</b>	<b>202,714</b>
		<b>Sub Total</b>	<b>232,714</b>			
	<b>MI 32-2</b>	A. Upgrade emergency pull cords	20,000	<b>MI 32-2</b>	A. Renovate bathrooms	100,000
		B. Expand maintenance shop	75,000		B. Replace street lights	25,000
		<b>Sub Total</b>	<b>95,000</b>		<b>Sub Total</b>	<b>125,000</b>
		<b>Total CFP Estimated Cost</b>	<b>501,714</b>			<b>501,714</b>

# Capital Fund Program Five-Year Action Plan

## Part II: Supporting Pages—Work Activities

Activities for Year 1	Activities for Year : 4 FFY Grant: PHA FY: 2011			Activities for Year: 5 FFY Grant: PHA FY: 2012		
	Development Name/Number	Major Work Categories	Estimated Cost	Development Name/Number	Major Work Categories	Estimated Cost
See Annual Statement	<b>HA Wide Operations</b>	A. Housing Operations	50,000	<b>HA Wide Operations</b>	A. Housing Operations	50,000
		<b>Sub Total</b>	<b>50,000</b>		<b>Sub Total</b>	<b>50,000</b>
	<b>HA Wide Management</b>	A. Resident programs	5,000	<b>HA Wide Management</b>	A. Resident programs	5,000
		B. Commissioner training	2,500		B. Commissioner training	2,500
	<b>Improvements</b>	C. Staff training	2,500	<b>Improvements</b>	C. Staff training	2,500
		D. Computer upgrades	5,000		D. Computer upgrades	5,000
		E. Family Investment Center	22,000		E. Family Investment Center	22,000
		<b>Sub Total</b>	<b>37,000</b>		<b>Sub Total</b>	<b>37,000</b>
		<b>HA Wide Admin Cost</b>	A. Partial Salary & benefits to staff working with CFP	50,000	<b>HA Wide Admin Cost</b>	A. Partial Salary & benefits to staff working with CFP
		<b>Sub Total</b>	<b>50,000</b>		<b>Sub Total</b>	<b>50,000</b>
	<b>HA Wide Fees &amp; Cost</b>	A. A/E Services	30,000	<b>HA Wide Fees &amp; Cost</b>	A. A/E Services	30,000
		B. Consulting Service	7,000		B. Consulting Service	7,000
		<b>Sub Total</b>	<b>37,000</b>		<b>Sub Total</b>	<b>37,000</b>
	<b>MI 32-1</b>	A. Replace maintenance vehicles	65,496	<b>MI 32-1</b>	A. Relocate bldg water shut-off valves	75,000
		B. Continue replacement of windows	155,000		B. Replace unit water shut-off valves	50,000
		C. Replacement of kitchen cabinets	107,218		C. Replace apt light fixtures	70,000
		<b>Sub Total</b>	<b>327,714</b>		<b>Sub Total</b>	<b>195,000</b>
				<b>MI 32-2</b>	A. Resurface & seal parking	50,000
					B. Replace heating boilers	50,000
					C. Patch & paint interiors	32,714
					<b>Sub Total</b>	<b>132,714</b>
		<b>Total CFP Estimated Cost</b>	<b>501,714</b>			<b>501,714</b>

**Criteria for Substantial Deviation and Significant Amendments**

**19. Definition of “Substantial Deviation” and “Significant Amendment or Modification”**

PHAs must define the terms “Substantial Deviation” and “Significant Amendment or Modification” by stating the basic criteria for such definitions in an annual plan that has met full public process and Resident Advisory Board review.

Until the PHA has met the requirement to define “significant amendments or modification,” HUD will consider the following actions to be significant amendment or modification, “HUD will consider the following actions to be significant amendments or modifications:

- Changes to rent or admissions policies or organization of the waiting list;
- Additions of non-emergency work items (not included in the current Annual Statement or 5-Year Action Plan) or change in use of replacement reserve funds under the capital fund;
- Additions of new activities not included in any current HUD-funded program such as PHDEP, or EDSS;
- Any change with regard to demolition or disposition, designation, homeownership programs or conversion activities.

Any exception to this definition will be made for any of the above activities that are adopted to reflect changes in HUD regulatory requirements. Such changes will not be considered significant amendments by HUD.

## **Attachment E: Summary of Policy and Program Changes**

### **Summary of Policy and Program Changes**

The BTHC has not made nor intends to make any major policy or program changes in 2008. Local preferences were established and will not change, rent policies remain the same, community service policy parameters were included in our lease and ACOP were implemented, and our family development pet policy has been implemented. .

### **Our Policy regarding the Violence Against Women Act (VAWA)**

The BTHC shall not deny admission 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.

This language has been incorporated into both the ACOP and Section 8 Administration Plan.

A copy of our VAWA is attached at the end of this plan.

**Attachment F: Resident Member on the PHA Governing Board**

**Resident Member on the PHA Governing Board**

1.  Yes  No: Does the PHA governing board include at least one member who is directly assisted by the PHA this year? (if no, skip to #2)

A. Name of resident member(s) on the governing board:

Annette Davis

B. How was the resident board member selected: (select one)?

Elected

Appointed

C. The term of appointment is (include the date term expires):

June 18, 2007 to May 18, 2008

2. A. If the PHA governing board does not have at least one member who is directly assisted by the PHA, why not?

the PHA is located in a State that requires the members of a governing board to be salaried and serve on a full time basis

the PHA has less than 300 public housing units, has provided reasonable notice to the resident advisory board of the opportunity to serve on the governing board, and has not been notified by any resident of their interest to participate in the Board.

Other (explain):

A. Date of next term expiration of a governing board member:

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

Mr. Ronald Ferguson, Benton Charter Township Supervisor

**Membership of the Resident Advisory Board or Boards**

List members of the Resident Advisory Board or Boards: (If the list would be unreasonably long, list organizations represented or otherwise provide a description sufficient to identify how members are chosen.)

Mrs. Gashonda Triplett  
Tatarona Bickham  
Tonette Singleton

## **Attachment H: Progress in meeting the 5-Year Plan Mission and Goals**

### **Progress in meeting the 5-Year Plan Mission and Goals**

The PHA has been able to maintain its mission to promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination through the utilization of previous Capital funds and the proper application of our public housing policies.

We are continuing to address public housing vacancies very aggressively and our PHAS scores indicate that other operational issues are being positively addressed.

Capital funds have been utilized to provide modernization of our property and our FY 2008 application will continue that effort.

PHA has implemented local preferences to improve the living environment in addition to our modernization efforts

The BTHC intends to develop and submit a Designated Housing Plan before 12/31/2008 to identify MI 32-2, Plaza Manor as a development for the Elderly Only.

The implementation of a family pet policy has provided the opportunity for residents to enjoy pets within a regulated environment. In addition, PHA re-instated a Community Service program October 31, 2003.

We are confident that the PHA will be able to continue to meet and accommodate all our goals and objectives for FY 2008.

**Attachment I: Component 3, (6) Deconcentration and Income Mixing**

**Component 3, (6) Deconcentration and Income Mixing**

- a.  Yes  No: Does the PHA have any general occupancy (family) public housing developments covered by the deconcentration rule? If no, this section is complete. If yes, continue to the next question.
- b.  Yes  No: Do any of these covered developments have average incomes above or below 85% to 115% of the average incomes of all such developments? If no, this section is complete.

If yes, list these developments as follows:

<b>Deconcentration Policy for Covered Developments</b>			
<b>Development Name:</b>	<b>Number of Units</b>	<b>Explanation (if any) [see step 4 at §903.2(c)(1)(iv)]</b>	<b>Deconcentration policy (if no explanation) [see step 5 at §903.2(c)(1)(v)]</b>

## **Attachment J: Implementation of Public Housing Resident Community Service Requirement**

### Implementation of Public Housing Resident Community Service Requirement

The Benton Township Housing Commission's policy is designed to identify which adult family members are subject to or exempt from the service requirements; to explain how the PHA will administer its program; to identify PHA and/or third party certification opportunities available to eligible adult family members; and to assure resident compliance with identified work activities with fair and equitable actions.

#### PHA Responsibilities

##### (1.) Eligibility Determination

The PHA will review every existing resident file to determine each Adult member's status regarding community service per the following guidelines.

- a. As family status is determined a registered letter or other certifiable document of receipt will be sent to each adult member of that family to notify them of their status (exempt or non-exempt) and explaining the steps they should immediately proceed with through their housing representative.
- b. The PHA will include a copy of the general information section of its Community Service Policy and a listing of PHA and/or third party work activities that are eligible for certification of the community service requirement.
- c. At the scheduled meeting with each non-exempt adult family member, not only will the parameters of the community service requirement be reviewed but also the PHA and/or third party work activities will be identified and selected for compliance with the annual obligation for certification at their annual lease renewal date.

##### (2.) Work Activity Opportunities

The Benton Township Housing Commission has elected to provide to those adult family members that must perform community service activities the opportunity to select either PHA sanctioned work activities or Third Party certifiable work items. The administration of the certification process would be:

###### a. PHA Provided Activities.

When qualifying activities are provided by the Commission directly, designated Commission employee(s) shall provide signed certification that the family member has performed the proper number of hours for the selected service activities.

###### b. Third Party Certification

When qualifying activities are administered by any organization other than PHA, the family member must provide signed certification (see III A (c)) to the Commission by such third party organization that said family member has performed appropriate service activities for the required hours.

###### c. Verification of Compliance.

The Commission is required to review family compliance with service requirement, and must verify such compliance annually at least thirty (30) days before the end of the twelve (12) month lease term (annual re-certification time). Evidence of service performance and/or exemption must be maintained in the participant files.

###### d. Notice of Noncompliance.

If the Commission determines that, a family member who is subject to fulfilling a service requirement, but who has violated the family's obligation (a noncompliant resident) the Commission must notify the specific family member of this determination.

The Notice of Noncompliance must:

## **Attachment J: Implementation of Public Housing Resident Community Service Requirement**

1. Briefly, describe the noncompliance (inadequate number of hours).
  2. State that the Commission will not renew the lease at the end of the twelve (12) month lease term unless:

The resident or any other noncompliant adult family member enters into a written agreement with the Commission to cure the noncompliance and in fact perform to the letter of agreement.

- Or -

The family provides written assurance satisfactory, to the PHA that the resident or other noncompliant adult family member no longer resides in the unit.

This Notice of Noncompliance must also state that the resident may request a grievance hearing and that the resident may exercise any available judicial remedy to seek timely redress for the Commission's non-renewal of the lease because of a noncompliance determination.
- e. Resident agreement to comply with the service requirement.
- The written agreement entered into with the Commission to cure the service requirement noncompliance by the resident and any other adult family member must:
1. Agree to complete additional service hours needed to make up the total number of hours required over the twelve (12) month term of the new lease.
  2. State that all other members of the family subject to the service requirement are in current compliance with the service requirement or are no longer residing in the unit.
- f. The Benton Township Housing Commission has developed a list of Agency certifiable and/or third party work activities of which each non-exempt adult family member can select to perform their individual service requirement.

## PET POLICY FOR FAMILY DEVELOPMENTS

In compliance with Section 526 of The Quality Housing and Work Responsibility Act of 1998, PHA residents shall be permitted to own and keep common household pets. Animals that are an auxiliary for persons with a disability are excluded from this policy. The ownership of common household pets is subject to the following rules and limitations:

1. Common household pets shall be defined as “domesticated animals such as a dog, cat, bird, rodent, fish or turtle”. Common household pets are defined as follows:

Bird	Includes Canary, Parakeet, Finch and other species that are normally kept caged; birds of prey are not permitted.								
Fish	In tanks or aquariums, not to exceed twenty (20) gallons in capacity; poisonous or dangerous fish are not permitted.								
Dogs	Not to exceed twenty-five pounds (25 lbs.) weight, or fifteen (15) inches in height at full growth. Dogs must be spayed or neutered. Veterinarian’s recommended /suggested types of dogs are as follows: <table><tr><td>a. Chihuahua</td><td>e. Cocker Spaniel</td></tr><tr><td>b. Pekingese</td><td>f. Dachshund</td></tr><tr><td>c. Poodle</td><td>g. Terriers</td></tr><tr><td>d. Schnauzer</td><td></td></tr></table>	a. Chihuahua	e. Cocker Spaniel	b. Pekingese	f. Dachshund	c. Poodle	g. Terriers	d. Schnauzer	
a. Chihuahua	e. Cocker Spaniel								
b. Pekingese	f. Dachshund								
c. Poodle	g. Terriers								
d. Schnauzer									

### NO PIT BULLS WILL BE PERMITTED

- |             |   |
|-------------|---|
| Cats        | Cats must be spayed or neutered and be de-clawed or have scratching post, and should not exceed fifteen pounds (15 lbs.).                           |
| Rodents     | Rodents other than hamsters, gerbils, white rats or mice are not considered common household pets. These animals must be kept in appropriate cages. |
| Reptiles    | Reptiles other than turtles or small lizards such as chameleons are not considered common household pets.   |
| Exotic Pets | At no time will the PHA approve of exotic pets, such as snakes, monkeys, game pets, etc.  |
2. No more than one (1) dog or cat shall be permitted in a household. In the case of birds, a maximum of two birds may be permitted. There shall be no limit as to the number of fish, but no more than one aquarium with a maximum capacity of twenty (20) gallons shall be permitted. A Resident with a dog or cat may also have other categories of “common household pets” as defined above.
  3. Pets other than a dog or cat shall be confined to an appropriate cage or container. Such a pet may be removed from its cage while inside the owner’s apartment for the purpose of handling, but shall not generally be unrestrained.
  4. Only one (1) dog or cat is allowed per household. **NO PIT BULLS WILL BE PERMITTED.** All dogs and cats will need to be on a leash, tied up, or otherwise restrained at all times when they are outside. Neither dogs nor cats shall be permitted to run loose.
  5. Pet owners shall maintain their pet in such a manner as to prevent any damage to their unit, yard or common areas of the community in which they live. The animal shall be maintained so as not

## Attachment K: Pet Policy for Family Developments

- to be a nuisance or a threat to the health or safety of neighbors, PHA employees, or the public, by reason of noise, unpleasant odors or other objectionable situations.
6. Each pet owner shall be fully responsible for the care of the pet, including the proper disposal of pet wastes in a safe and sanitary manner. Animal wastes must be collected by the pet owner and put into a plastic bag that is then tied shut and disposed of by placing the bag into a waste disposal container. Improper disposal of pet waste is a lease violation and may be grounds for termination.
  7. All pets shall be inoculated and licensed in accordance with applicable state and local laws. All cats or dogs shall be neutered or spayed, unless a veterinarian certifies that the spaying or neutering would be inappropriate or unnecessary (because of health, age, etc.).
  8. All pets shall be registered with the Management Office immediately. Registration shall consist of providing:
    - a. Basic information about the pet (type, age, description, name, etc.);
    - b. Proof of inoculation and licensing;
    - c. Proof of liability insurance with the PHA named as certificate holder
    - d. Proof of neutering or spaying. All female dogs over the age of six (6) months and female cats over the age of five (5) months must be spayed. All male dogs over the age of eight (8) months and all male cats over the age of ten (10) months must be neutered. If health problems prevent such spaying or neutering, a veterinarian's certificate will be necessary to allow the pet to become or continue to be a Resident of the community;
    - e. Payment of a \$200.00 pet deposit to defray the cost of potential damage done by the pet to the unit or to common areas of the community. BTHC reviewed all previous Senior Resident charges and damages that were done by a pet to the units, and averaged the cost. (Over half of the units, had to have tiles replaced and lawns repaired.) There shall be no additional deposit for pets other than dogs or cats. The additional deposit shall not preclude charges to a Resident for repair of damages done on an ongoing basis by a pet. The Resident is responsible for all damages caused by the pet and will reimburse the Commission for all costs it incurs in repairing such damages. This deposit is refundable **if** no damage is identified at the move-out inspection.
    - f. If a Resident cannot care for their pet due to an illness, absence, or death, and no other person can be found to care for the pet, after twenty-four (24) hours have elapsed, the tenant hereby gives permission for the pet to be released to the Humane Society/Animal Control, in accordance with their procedures. In no case shall PHA incur any costs or liability for the care of a pet placed in the care of another individual or agency under this procedure.

Provide the name, address and phone number of one or more persons who will care for the pet if you are unable to do so. This information will be updated annually.
  9. Any litigation resulting from actions by pets shall be the sole responsibility of the pet owner. The pet owner agrees to indemnify and hold harmless the PHA from all claims, causes of action damages or expenses, including attorney's fees, resulting from the action or the activities of his or her pet.

**Attachment L: Policy For Animals That Assist Persons With Disabilities**

**POLICY FOR ANIMALS THAT ASSIST PERSONS WITH DISABILITIES**

Pet rules will not be applied to animals who assist persons with disabilities. To be excluded from the pet policy, the resident/pet owner must certify:

That there is a person with disabilities in the household;

That animal has been trained to assist with specified disability.

**Component 10 (B) Voluntary Conversion Initial Assessments**

- a. How many of the PHA’s developments are subject to the Required Initial Assessments?  
Two
- b. How many of the PHA’s developments are not subject to the Required Initial Assessments based on exemptions (e.g., elderly and/or disabled developments not general occupancy projects)?  
None
- c. How many Assessments were conducted for the PHA’s covered developments?  
One for each development a total of two developments
- d. Identify PHA developments that may be appropriate for conversion based on the Required Initial Assessments:  
None

Development Name	Number of Units

- e. If the PHA has not completed the Required Initial Assessments, describe the status of these assessments:  
N/A

Attachment N: 2007 CFP Performance and Evaluation Report

<b>Annual Statement/Performance and Evaluation Report</b> <b>Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary</b>						
<b>PHA Name:</b> <b>Benton Township Housing Commission</b>		<b>Grant Type and Number</b> Capital Fund Program Grant No: MI33P032501-07 Replacement Housing Factor Grant No:			<b>Federal FY of Grant:</b> <b>2007</b>	
<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: 3/31/08 <input type="checkbox"/> Final Performance and Evaluation Report						
Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost		
		Original	Revised	Obligated	Expended	
1	Total non-CFP Funds					
2	1406 Operations	45,000		0	0	
3	1408 Management Improvements	37,000		0	0	
4	1410 Administration	50,000		50,000	0	
5	1411 Audit					
6	1415 Liquidated Damages					
7	1430 Fees and Costs	32,000		0	0	
8	1440 Site Acquisition					
9	1450 Site Improvement	215,000		17,176	0	
10	1460 Dwelling Structures	69,496		0	0	
11	1465.1 Dwelling Equipment—Nonexpendable					
12	1470 Nondwelling Structures	55,320		0	0	
13	1475 Nondwelling Equipment	5,000		0	0	
14	1485 Demolition					
15	1490 Replacement Reserve					
16	1492 Moving to Work Demonstration					
17	1495.1 Relocation Costs					
18	1499 Development Activities					
19	1502 Contingency					
20						
21	Amount of Annual Grant: (sum of lines 1-19..)	508,816		67,176	0	
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					
27	Collateralization Expenses or Debt Service					

<b>Annual Statement/Performance and Evaluation Report</b>									
<b>Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)</b>									
<b>Part II: Supporting Pages</b>									
PHA Name: <b>Benton Township Housing Commission</b>			Grant Type and Number Capital Fund Program Grant No: MI33P032501-07 Replacement Housing Factor Grant No:				Federal FY of Grant: 2007		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
					Original	Revised	Funds Obligated	Funds Expended	
HA Wide Operations	A. Housing Operations		1406	3%	45,000		0.00	0.00	0% Complete
	<b>Sub total</b>				<b>45,000</b>		<b>0.00</b>	<b>0.00</b>	
HA Wide Management Improvements	A. Resident programs		1408	3	5,000		0.00	0.00	0% Complete
	B. Commissioner training		1408	2	2,500		0.00	0.00	0% Complete
	C. Staff training		1408	2	2,500		0.00	0.00	0% Complete
	D. Computer training		1408	3	5,000		0.00	0.00	0% Complete
	E. Family Investment Center Operations		1408	40%	22,000		0.00	0.00	0% Complete
	<b>Sub total</b>				<b>37,000</b>		<b>0.00</b>	<b>0.00</b>	
HA Wide Administration	A. Partial salary/benefits of staff involved in CFP		1410	10%	50,000		50,000.00	0.00	0% Complete
	<b>Sub total</b>				<b>50,000</b>		<b>50,000.00</b>	<b>0.00</b>	
HA Wide Fees and Cost	A. A/E services		1430	100%	30,000		0.00	0.00	0% Complete
	B. Consulting fees		1430	100%	2,000		0.00	0.00	0% Complete
	<b>Sub total</b>				<b>32,000</b>		<b>0.00</b>	<b>0.00</b>	

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

PHA Name: <b>Benton Township Housing Commission</b>		Grant Type and Number Capital Fund Program Grant No: MI33P032501-07 Replacement Housing Factor Grant No:				Federal FY of Grant: 2007			
Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost	Total Actual Cost		Status of Work	
MI 32-1	A. Resurface and seal parking		1450	6000 SY	30,000	0.00	0.00	0% Complete	
Blossom Acres	B. Repair/replace storm drains		1450	30%	65,000	17,165.00	0.00	0% Complete	
	C. Replace playground equipment		1450	100%	100,000	0.00	0.00	0% Complete	
	D. Refurbish basketball court		1450	LS	20,000	0.00	0.00	0% Complete	
	E. Replace maintenance equipment		1475		5,000	0.00	0.00	0% Complete	
	<b>Sub total</b>				<b>220,000</b>	<b>17,165.00</b>	<b>0.00</b>		
MI 32-2	A. Tuck point & seal brick		1460	21 Bldg	30,000	0.00	0.00	0% Complete	
Plaza Manor	B. Replace storage shed siding		1460	21 EA	39,496	0.00	0.00	0% Complete	
	C. Complete pavilion construction		1470	LS	55,320	0.00	0.00	0% Complete	
	<b>Sub total</b>				<b>124,816</b>	<b>0.00</b>	<b>0.00</b>		
	<b>Grand total</b>				<b>508,816</b>	<b>67,176.00</b>	<b>0.00</b>		



Annual Statement/Performance and Evaluation Report						
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary						
PHA Name: <b>Benton Township Housing Commission</b>		Grant Type and Number Capital Fund Program Grant No: MI33P032501-06 Replacement Housing Factor Grant No:			Federal FY of Grant: <b>2006</b>	
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/ Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no: 2) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 3/31/08 <input type="checkbox"/> Final Performance and Evaluation Report						
Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost		
		Original	Revised	Obligated	Expended	
1	Total non-CFP Funds					
2	1406 Operations	45,000	0	0	0	
3	1408 Management Improvements	37,000	27,898	27,898	5,124	
4	1410 Administration	45,000	45,000	45,000	22,500	
5	1411 Audit					
6	1415 Liquidated Damages					
7	1430 Fees and Costs	21,448	16,974	16,974	0	
8	1440 Site Acquisition					
9	1450 Site Improvement	0	43,624	43,624	0	
10	1460 Dwelling Structures	292,000	370,000	370,000	10,150	
11	1465.1 Dwelling Equipment—Nonexpendable	0	0	0	0	
12	1470 Nondwelling Structures	50,000	0	0	0	
13	1475 Nondwelling Equipment	13,048	0	0	0	
14	1485 Demolition					
15	1490 Replacement Reserve					
16	1492 Moving to Work Demonstration					
17	1495.1 Relocation Costs					
18	1499 Development Activities					
19	1502 Contingency					
20						
21	Amount of Annual Grant: (sum of lines 1-19..)	503,496	503,496	503,496	37,774	
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					
27	Collateralization Expenses or Debt Service					

Attachment O: 2006 CFP Performance and Evaluation Report

Annual Statement/Performance and Evaluation Report									
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)									
Part II: Supporting Pages									
PHA Name: <b>Benton Township Housing Commission</b>			Grant Type and Number Capital Fund Program Grant No: MI33P032501-06 Replacement Housing Factor Grant No:				Federal FY of Grant: 2006		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
					Original	Revised	Funds Obligated	Funds Expended	
HA Wide Operations	A. Housing Operations		1406	10%	45,000	0	0	0	Delete
	<b>Sub total</b>				<b>45,000</b>	<b>0</b>	<b>0</b>	<b>0</b>	
HA Wide Management Improvements	A. Resident programs		1408	100%	5,000	0	0	0	Delete
	B. Commissioner training		1408	100%	2,500	0	0	0	Delete
	C. Staff training		1408	3	2,500	0	0	0	Delete
	D. Computer Upgrade		1408	20%	5,000	0	0	0	Delete
	E. Family Investment Center Operations		1408	40%	22,000	22,000	22,000	0	0% Complete
	F. Management Consultant		1408	40%	0	5,898	5,898	5,124	23% Complete
	<b>Sub total</b>				<b>37,000</b>	<b>27,898</b>	<b>27,898</b>	<b>5,124</b>	
HA Wide Administration	A. Partial salary/benefits of staff involved in CFP		1410	10%	45,000	45,000	45,000	22,500	50% Complete
	<b>Sub total</b>				<b>45,000</b>	<b>45,000</b>	<b>45,000</b>	<b>22,500</b>	
HA Wide Fees and Cost	A. A/E fees & related cost		1430	100%	19,448	16,974	16,974	0	0% Complete
	B. Grant preparation		1430	100%	2,000	0	0	0	Delete
	<b>Sub total</b>				<b>21,448</b>	<b>16,974</b>	<b>16,974</b>	<b>0</b>	
MI 32-1	A. Continue renovating bathrooms		1460	250 EA	262,000	370,000	370,000	10,150	3% Complete
	B. Rehab vacant units		1460		30,000	0	0	0	Delete
	C. Drainage work to eliminate flooring		1450	LS	0	43,624	43,624	0	0% Complete
	<b>Sub total</b>				<b>292,000</b>	<b>413,624</b>	<b>413,624</b>	<b>10,150</b>	

Annual Statement/Performance and Evaluation Report									
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)									
Part II: Supporting Pages									
PHA Name: <b>Benton Township Housing Commission</b>			Grant Type and Number Capital Fund Program Grant No: MI33P032501-06 Replacement Housing Factor Grant No:				Federal FY of Grant: 2006		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories		Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
MI 32-2	A. Build pavilion		1470	1 Bldg	50,000	0	0	0	Delete
	<b>Sub total</b>				<b>50,000</b>	<b>0</b>	<b>0</b>	<b>0</b>	
HA Wide Nondwelling	A. Replace picnic tables & benches		1475	LS	7,000	0	0	0	Delete
Equipment	B. Replace maintenance equipment		1475	LS	6,048	0	0	0	Delete
	<b>Sub total</b>				<b>13,048</b>	<b>0</b>	<b>0</b>	<b>0</b>	
	<b>Grand total</b>				<b>503,496</b>	<b>503,496</b>	<b>503,496</b>	<b>37,774</b>	

<b>Annual Statement/Performance and Evaluation Report</b> <b>Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)</b> <b>Part III: Implementation Schedule</b>							
PHA Name: <b>Benton Township Housing Commission</b>		Grant Type and Number Capital Fund Program No: MI33P032501-06 Replacement Housing Factor No:				Federal FY of Grant: 2006	
Development Number Name/HA-Wide Activities	All Fund Obligated (Quarter Ending Date)			All Funds Expended (Quarter Ending Date)			Reasons for Revised Target Dates
	Original	Revised	Actual	Original	Revised	Actual	
HA Wide	7/17/08	4/30/08	4/30/08	7/17/10			
MI 32-1	7/17/08	4/30/08	4/30/08	7/17/10			
MI 32-2	7/17/08	4/30/08	4/30/08	7/17/10			

Attachment P: 2005 CFP Performance and Evaluation Report

Annual Statement/Performance and Evaluation Report					
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary					
PHA Name: <b>Benton Township Housing Commission</b>		Grant Type and Number Capital Fund Program Grant No: MI33P032501-05 Replacement Housing Factor Grant No:		Federal FY of Grant: <b>2005</b>	
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/ Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no: 1 ) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 3/31/08 <input type="checkbox"/> Final Performance and Evaluation Report					
Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations	47,000	47,018	47,018	47,018
3	1408 Management Improvements	37,000	20,792	20,792	20,792
4	1410 Administration	45,000	45,000	45,000	45,000
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	7,000	49,348	49,348	49,348
8	1440 Site Acquisition				
9	1450 Site Improvement	0	1,827	1,827	1,827
10	1460 Dwelling Structures	317,027	170,068	170,068	170,068
11	1465.1 Dwelling Equipment—Nonexpendable	0	23,338	23,338	23,338
12	1470 Nondwelling Structures	0	4,700	4,700	4,700
13	1475 Nondwelling Equipment	17,000	107,936	107,936	107,936
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495.1 Relocation Costs				
18	1499 Development Activities				
19	1502 Contingency				
20					
21	Amount of Annual Grant: (sum of lines 1-19..)	470,027	470,027	470,027	470,027.00
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				
27	Collateralization Expenses or Debt Service				

Attachment P: 2005 CFP Performance and Evaluation Report

Annual Statement/Performance and Evaluation Report								
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)								
Part II: Supporting Pages								
PHA Name: <b>Benton Township Housing Commission</b>			Grant Type and Number Capital Fund Program Grant No: MI33P032501-05 Replacement Housing Factor Grant No:			Federal FY of Grant: 2005		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
HA Wide Operations	A. Housing Operations	1406	10%	47,000	47,018	47,018	47,018	Completed
	<b>Sub total</b>			<b>47,000</b>	<b>47,018</b>	<b>47,018</b>	<b>47,018</b>	
HA Wide Management Improvements	A. Resident programs	1408	100%	5,000	817	817	817	Completed
	B. Commissioner training	1408	100%	2,500	0	0	0	Delete
	C. Staff training	1408	3	2,500	0	0	0	Delete
	D. Computer Upgrade	1408	20%	7,000	4,568	4,568	4,568	Completed
	E. Family Investment Center Operations	1408	40%	20,000	8,287	8,287	8,287	Completed
	F. Management Consultant	1408	LS	0	7,120	7,120	7,120	Completed
	<b>Sub total</b>			<b>37,000</b>	<b>20,792</b>	<b>20,792</b>	<b>20,792</b>	
HA Wide Administration	A. Partial salary/benefits of staff involved in CFP	1410	10%	45,000	45,000	45,000	45,000	Completed
	<b>Sub total</b>			<b>45,000</b>	<b>45,000</b>	<b>45,000</b>	<b>45,000</b>	
HA Wide Fees and Cost	A. A/E fees & related cost	1430	100%	5,000	46,868	46,868	46,868	Completed
	B. Consulting fees	1430	100%	2,000	2,480	2,480	2,480	Completed
	<b>Sub total</b>			<b>7,000</b>	<b>49,348</b>	<b>49,348</b>	<b>49,348</b>	

Attachment P: 2005 CFP Performance and Evaluation Report

Annual Statement/Performance and Evaluation Report								
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)								
Part II: Supporting Pages								
PHA Name: <b>Benton Township Housing Commission</b>			Grant Type and Number Capital Fund Program Grant No: MI33P032501-05 Replacement Housing Factor Grant No:			Federal FY of Grant: 2005		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
MI 32-1	A. Continue replacement exterior doors	1460	545 EA	217,027	21,905	21,905	21,905	Completed
	B. Replace roof on Admin Bldg	1470	1 Bldg	0	4,700	4,700	4,700	Completed
	C. Replace appliances	1465.1	11 Pair	0	23,338	23,338	23,338	Completed
	D. Replace toilets	1460	148 EA	0	29,696	29,696	29,696	Completed
	E. Replace emergency call	1460	1 Sys	0	1,740	1,740	1,740	Completed
	F. Comp MOD interior of unit	1460	10 Units	0	50,000	50,000	50,000	Completed
	<b>Sub total</b>			<b>217,027</b>	<b>131,379</b>	<b>131,379</b>	<b>131,379</b>	
MI 32-2	A. Replace interior lights	1460	300 Units	50,000	13,000	13,000	13,000	Completed
	B. Replace bathtub plumbing	1460	100 EA	50,000	0	0	0	Delete
	C. Emergency light pole receptacle	1450	1 EA	0	1,827	1,827	1,827	Completed
	D. Replace emergency strobe lights & nurse call	1460	100 EA	0	10,692	10,692	10,692	Completed
	E. Replace toilets	1460	100 EA	0	33,035	33,035	33,035	Completed
	F. Exterior brick repair/replacement	1460	4 Bldg	0	10,000	10,000	10,000	Completed
	<b>Sub total</b>			<b>100,000</b>	<b>68,554</b>	<b>68,554</b>	<b>68,554</b>	
HA Wide Nondwelling Equipment	A. Maintenance equipment	1475	LS	10,000	6,081	6,081	6,081	Completed
	B. Community room furniture	1475	LS	7,000	1,201	1,201	1,201	Completed
	C. Computer hardware	1475	LS	0	1,254	1,254	1,254	Completed
	D. Replace playground equipment	1475	LS	0	99,400	99,400	99,400	Completed
	<b>Sub total</b>			<b>17,000</b>	<b>107,936</b>	<b>107,936</b>	<b>107,936</b>	
	<b>Grand total</b>			<b>470,027</b>	<b>470,027</b>	<b>470,027</b>	<b>470,027</b>	



Attachment Q: 2004 CFP Performance and Evaluation Report

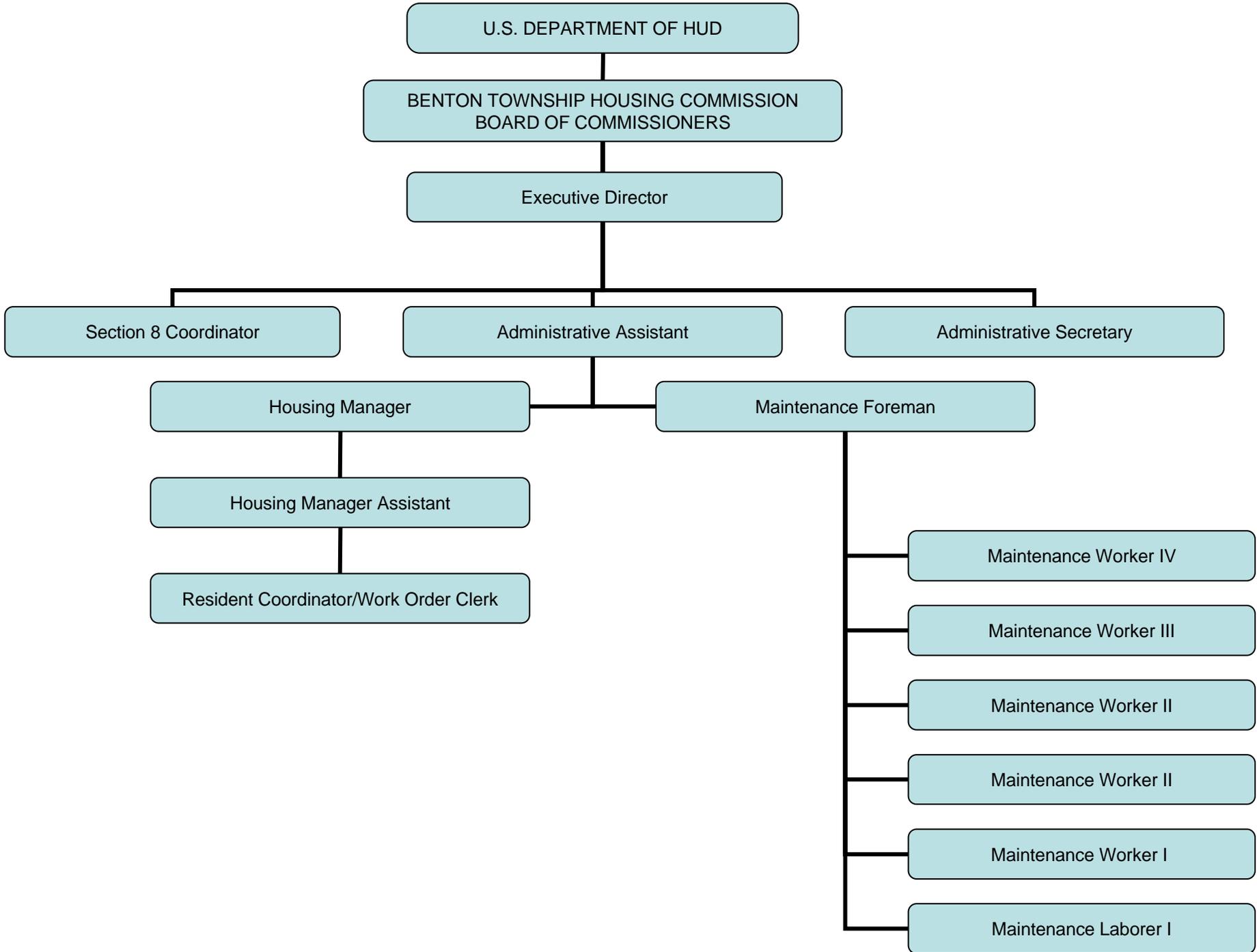
Annual Statement/Performance and Evaluation Report						
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF) Part 1: Summary						
PHA Name: <b>Benton Township Housing Commission</b>		Grant Type and Number Capital Fund Program Grant No: MI33P032501-04 Replacement Housing Factor Grant No:			Federal FY of Grant: <b>2004</b>	
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/ Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: 2 ) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 3/31/08 <input checked="" type="checkbox"/> Final Performance and Evaluation Report						
Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost		
		Original	Revised	Obligated	Expended	
1	Total non-CFP Funds					
2	1406 Operations	75,281	75,281	75,281	75,281	
3	1408 Management Improvements	44,000	29,656	29,655	29,655	
4	1410 Administration	45,000	45,000	45,000	45,000	
5	1411 Audit					
6	1415 Liquidated Damages					
7	1430 Fees and Costs	7,000	3,584	3,584	3,584	
8	1440 Site Acquisition					
9	1450 Site Improvement	85,000	76,575	76,575	76,575	
10	1460 Dwelling Structures	294,123	318,736	318,736	318,736	
11	1465.1 Dwelling Equipment—Nonexpendable					
12	1470 Nondwelling Structures					
13	1475 Nondwelling Equipment	10,000	11,573	11,573	11,573	
14	1485 Demolition					
15	1490 Replacement Reserve					
16	1492 Moving to Work Demonstration					
17	1495.1 Relocation Costs					
18	1499 Development Activities					
19	1502 Contingency					
20	Amount of Annual Grant: (sum of lines...1-19..)	560,404	560,405	560,404	560,404.00	
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 –Soft Costs					
24	Amount of Line 20 related to Security-- Hard Costs					
25	Amount of line 20 Related to Energy Conservation Measures					
26	Collateralization Expenses or Debt Service					

Attachment Q: 2004 CFP Performance and Evaluation Report

Annual Statement/Performance and Evaluation Report								
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)								
Part II: Supporting Pages								
PHA Name: <b>Benton Township Housing Commission</b>			Grant Type and Number Capital Fund Program Grant No: MI33P032501-04 Replacement Housing Factor Grant No:			Federal FY of Grant: <b>2004</b>		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised	Funds Obligated	Funds Expended	
HA Wide Operations	A. Housing Operations	1406	13%	75,281	75,281	75,281	75,281	Completed
	<b>Sub total</b>			<b>75,281</b>	<b>75,281</b>	<b>75,281</b>	<b>75,281</b>	
HA Wide Management Improvements	A. Resident programs	1408	100%	3,805	13,752	13,752	13,752	Completed
	B. Agency Plan development	1408	100%	1,500	950	950	950	Completed
	C. Staff training	1408	3	1,500	0	0	0	Delete
	D. Computer Upgrade	1408	20	5,195	7,445	7,445	7,445	Completed
	E. Family Investment Center Operations	1408	40%	32,000	7,508	7,508	7,508	Completed
	<b>Sub total</b>			<b>44,000</b>	<b>29,655</b>	<b>29,655</b>	<b>29,655</b>	
HA Wide Administration	A. Partial salary/benefits of staff involved in CFP	1410	8%	45,000	45,000	45,000	45,000	Completed
	<b>Sub total</b>			<b>45,000</b>	<b>45,000</b>	<b>45,000</b>	<b>45,000</b>	
HA Wide Fees and Cost	A. A/E fees & related cost	1430	100%	5,000	0	0	0	Delete
	B. Consultant fees	1430	100%	2,000	3,584	3,584	3,584	Completed
	<b>Sub total</b>			<b>7,000</b>	<b>3,584</b>	<b>3,584</b>	<b>3,584</b>	

Annual Statement/Performance and Evaluation Report								
Capital Fund Program and Capital Fund Program Replacement Housing Factor (CFP/CFPRHF)								
Part II: Supporting Pages								
PHA Name: <b>Benton Township Housing Commission</b>			Grant Type and Number Capital Fund Program Grant No: MI33P032501-04 Replacement Housing Factor Grant No:			Federal FY of Grant: <b>2004</b>		
Development Number Name/HA-Wide Activities	General Description of Major Work Categories	Dev. Acct No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
HA Wide	A. Landscaping	1450	LS	85,000	76,575	76,575	76,575	Completed
	<b>Sub total</b>			<b>85,000</b>	<b>76,575</b>	<b>76,575</b>	<b>76,575</b>	
MI 32-1	A. Renovate bathrooms	1460	100 Units	108,873	0	0	0	Delete
	B. complete exterior door replacement	1460	96 Units	144,000	140,535	140,535	140,535	Completed
	C. Replace screen doors	1460	200 Units	0	123,840	123,840	123,840	Completed
	<b>Sub total</b>			<b>252,873</b>	<b>264,375</b>	<b>264,375</b>	<b>264,375</b>	
MI 32-2	A. Replace hot water heaters	1460	40 Units	16,250	10,815	10,815	10,815	Completed
	B. Repair roof & gutter	1460	5 Bldg	25,000	0	0	0	Delete
	C. Replace bathtub faucets	1460	100 Units	0	35,800	35,800	35,800	Completed
	D. Replace light fixtures	1460	100 Units	0	7,746	7,746	7,746	Completed
	<b>Sub total</b>			<b>41,250</b>	<b>54,361</b>	<b>54,361</b>	<b>54,361</b>	
HA Wide Nondwelling Equipment	A. Maintenance equipment	1475	1 EA	10,000	8,923	8,923	8,923	Completed
	B. Office & community room furniture	1475	LS	0	2,650	2,650	2,650	Completed
				<b>10,000</b>	<b>11,573</b>	<b>11,573</b>	<b>11,573</b>	
	<b>Grand total</b>			<b>560,404</b>	<b>560,404</b>	<b>560,404</b>	<b>560,404</b>	





**BENTON TOWNSHIP HOUSING COMMISSION**  
**DOMESTIC VIOLENCE POLICY**  
**PUBLIC HOUSING**  
APRIL 22, 2008

RESOLUTION NO. 2219

**1. Eligibility screening and domestic violence**

- a. An applicant household shall not be denied assistance solely because it includes a victim of domestic violence, provided that the perpetrator of domestic violence is not a member of the applicant household.
- b. In determining eligibility for housing assistance in cases where Benton Township Housing Commission has become aware that the household includes a victim of domestic violence, and when screening reveals negative and potentially disqualifying information, such as poor credit history, previous damage to an apartment, or a prior arrest, inquiries will be made regarding the circumstances contributing to this negative reporting, to ascertain whether these past events were the consequence of domestic violence against a member to the applicant household.
- c. Any such inquiries will make clear that members of applicant households have a right to keep any history of domestic violence against them confidential.
- d. When inquiries reveal that the negative reporting was the consequence of domestic violence against a member of the applicant household, the applicant household will not be denied housing assistance on the basis of this reporting, provided that the perpetrator of domestic violence is not a member of the applicant household.
- e. All adult members of a household applying for assistance will be informed that in the above circumstances, a history of domestic violence will mitigate negative findings due to the domestic violence.

**2. Termination of housing assistance**

Individuals will not be terminated from housing assistance solely because they are the victims of domestic violence, or because they have sought the assistance of the police or the courts.

The Benton Township Housing Commission can evict for other good cause unrelated to the incident or incidents of domestic violence, dating violence or stalking provided that the victim is not subject to a “more demanding standard” than non-victims.

### **3. Family break-up policies**

- a. When a household receiving assistance breaks up and domestic violence is a factor, first priority will be given to the best interest of the family.
- b. If there is a court determination of the family members' respective rights as to the housing assistance, including a determination set out in a personal protection order that determination will be taken into consideration.
- c. An individual receiving housing assistance must notify the Benton Township Housing Commission when a household composition changes due to domestic violence. The rent which had previously been determined, based on the income of an abusive family member who has left the household or has been excluded from the household by a personal protection order or other court order, will be adjusted to reflect the household's changed circumstances. In any event, rent changes shall be made in accordance with the Commission's Admission and Continued Occupancy Policy.
- d. When households including both citizens and noncitizens break up, a noncitizen victim of domestic violence may still be eligible for housing assistance only if they are a national or eligible non-citizen or if they have remaining family members that are eligible. In this case assistance will be prorated, in accordance with the Commission's Admission and Continued Occupancy Policy.

For example:

Should the household contain 2 adults and the offending member was an eligible citizen and the non-offending member was not, they would not be eligible for continued assistance.

Should the household contain 2 adult members and the offending member is an eligible citizen and the non-offending member is non-eligible, but their 2 eligible children assistance would continue, at a prorated rate for the 2 eligible children. The non-eligible adult could retain housing but would receive no subsidy.

In such instances, the noncitizen victim of domestic violence may be referred to local legal service agencies, for assistance in self-petitioning for legal permanent residency statute for the non-eligible member.

### **4. Emergency transfers, relocations and portability**

- a. A public housing household is required to give written notice to BTHC before moving out or terminating the lease. If the household must move to protect a member's safety the household is responsible to pay BTHC their share of rent and to follow program rules until the

BTHC releases tenant from their lease obligations. The Benton Township Housing Commission may also refer public housing resident to local legal service agencies for assistance.

- b. The Benton Township Housing Commission would make every effort, once the domestic violence has been verified to assist the family in transferring to a different BTHC unit provided:
  1. that an approved size unit is available and
  2. these transfers are approved by the screening committee.

## **5. CERTIFICATION OF DOMESTIC VIOLENCE, DATING VIOLENCE OR STALKING**

Among other requirements, Sections 606 and 607 of VAWA add certification and confidentiality provisions that allow for PHAs, owners or managers responding to an incident or incidents of actual or threatened domestic violence, dating violence or stalking that may affect a tenant's participation in the housing program to request in writing that an individual complete, sign and submit, within 14 business days of the request, a HUD-approved certification form. On the form, the individual certifies that he/she is a victim of domestic violence, dating violence, or stalking, and that the incident or incidences in questions are bona fide incidences of such actual or threatened abuse. On the certification form, the individual shall provide the name of the perpetrator.

In lieu of a certification form, or in addition to the certification form, a tenant may provide to PHAs, managers or owners, (1) a Federal, State, tribal, territorial, or local police record or court record; (2) documentation signed and attested to 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 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, or stalking has signed or attested to the documentation.

## **6. Linkage with community resources**

At orientation an informational directory will be presented to each new participant. When the Benton Township Housing Commission becomes aware that an individual is experiencing or has experienced domestic violence, the Benton Township Housing Commission may refer him or her to domestic violence advocates. The Benton Township Housing Commission will also inform the individual that local legal service agencies are available to provide assistance and representation to domestic violence victims in obtaining and maintaining personal protection orders, custody orders, exclusive use of the home, and other necessary legal remedies for victims of domestic violence; that the Personal

Protection Order office is available to provide assistance in obtaining PPO's; and that the Benton Charter Township Police Department is available for emergency response and intervention.

## **7. Definitions**

- a. "Domestic violence" is defined as the behavior set out in M.C.L.A. § 600.2950 (1) carried out by those categories of persons set out in M.C.L.A. § 600.2950 (1). It is not limited to violence between individuals who are married or formerly married or who have a child in common. It includes threats and any other conduct that causes a reasonable apprehension of violence by those categories of persons set out in M.C.L.A. § 600.2950 (1) is attached as Appendix A.
- b. A "perpetrator" of domestic violence is defined as the primary aggressor in a violent relationship. In situations where there is doubt as to who the primary aggressor is in a violent relationship, appropriate considerations include the relative severity of injuries each person has received as a result of the violence, any history of complaints of domestic violence against either individual or household members, and others accounts of the history of the domestic violence, and whether one person acted in self-defense.
- c. "Dating Violence" is committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors: (i) the length of the relationship; (ii) the type of relationship; and (iii) the frequency of interaction between the persons involved in the relationship.
- d. "Stalking" to follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate; or to place under surveillance with the intent to kill, injure, harass, or intimidate and 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 death, or serious bodily injury, 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.
- e. Immediate Family Member: a spouse, parent, brother or sister, or child of the person, or an individual to whom that person stands in loco parentis (in place of a parent); or any other person living in the household of that person and related to that person by blood or marriage.

## **8. Verification of domestic violence**

- a. The Benton Township Housing Commission may accept any of following as verification of the existence of domestic within the household.
  - Credible statement from victim.

- Statement of workers from a domestic violence shelter or other domestic violence program.
- Statement from counselors.
- Medical records.
- Reports and statements from police, judges and other court officials, clergy, social workers, and other social service agencies.
- Any other form of credible evidence.

**9. Confidentiality**

- a. Any documentation or evidence supplied by an individual to verify domestic violence will be kept strictly confidential and will not be shared with any person other than the relevant Benton Township Housing Commission decision makers unless the individual voluntarily waives confidentiality.
- b. Any information provided by an individual regarding his or her status as a victim of domestic violence will be kept strictly confidential and will not be shared with any person other than the relevant Benton Township Housing Commission decision makers unless the individual voluntarily waives confidentiality.
- c. All legal mandates of confidentiality will be honored.

**APPENDIX A  
M.C.L.A § 600.2950(1)**

Sec. 2950. (1) provides in pertinent part:

[A]n individual may petition the family division of circuit court to enter a personal protection order to restrain or enjoin a spouse, a former spouse, an individual with whom he or she had a child in common, an individual with whom he or she has had a dating relationship, or an individual residing or resided in the same household as the petitioner from doing 1 or more of the following:

- (a) Entering onto premises.
- (b) Assaulting, attacking, breathing on, molesting, or wounding a named individual.
- (c) Threatening to kill or physically injure a named individual.
- (d) Removing minor children from the individual having legal custody of the children, except as otherwise authorized by custody or parenting time order issued by a court of competent jurisdiction.
- (e) Purchasing or possessing a firearm.
- (f) Interfering with petitioner's efforts to remove petitioner's children or personal property from premises that are solely owned or leased



**CERTIFICATION OF DOMESTIC VIOLENCE, DATING VIOLENCE, OR STALKING**

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

OMB Approval No. 2577-0249  
Exp. (07/31/2007)

**Public reporting burden** for this collection of information is estimated to average 1 hour per response. This includes the time for collecting, reviewing, and reporting the data. Information provided is to be used by PHAs and Section 8 owners or managers to request a tenant to certify that the individual is a victim of domestic violence, dating violence or stalking. The information is subject to the confidentiality requirements of the HUD Reform Legislation. This agency may not collect this information, and you are not required to complete this form unless it displays a currently valid OMB control number.

**Purpose of Form:** The Violence Against Women and Justice Department Reauthorization Act of 2005 protects qualified tenants and family members of tenants who are victims of domestic violence, dating violence, or stalking from being evicted or terminated from housing assistance based on acts of such violence against them.

**Use of Form:** A family member must complete and submit this certification, or the information that may be provided in lieu of the certification, within 14 business days of receiving the written request for this certification by the PHA, owner or manager. The certification or alternate documentation must be returned to the person and address specified in the written request for the certification. If the family member has not provided the requested certification or the information that may be provided in lieu of the certification by the 14th business day or any extension of the date provided by the PHA, manager and owner, none of the protections afforded to victims of domestic violence, dating violence or stalking (collectively "domestic violence") under the Section 8 or public housing programs apply.

Note that a family member may provide, in lieu of this certification (or in addition to it):

- (1) A Federal, State, tribal, territorial, or local police or court record; or
- (2) 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 abuse, in which the professional attest 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.

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**TO BE COMPLETED BY THE VICTIM OF DOMESTIC VIOLENCE:**

**Date Written Request Received By Family Member:** \_\_\_\_\_

**Name of the Victim of Domestic Violence:** \_\_\_\_\_

**Name(s) of other family members listed on the lease** \_\_\_\_\_

**Name of the abuser:** \_\_\_\_\_

**Relationship to Victim:** \_\_\_\_\_

**Date the incident of domestic violence occurred:** \_\_\_\_\_

**Time:** \_\_\_\_\_

**Location of Incident:** \_\_\_\_\_

Name of victim:

---

Description of Incident:

[INSERT TEXT LINES HERE]

I hereby certify that the information that I have provided is true and correct and I believe that, based on the information I have provided, that I am a victim of domestic violence, dating violence or stalking and that the incident(s) in question are bona fide incidents of such actual or threatened abuse. I acknowledge that submission of false information relating to program eligibility is a basis for termination of assistance or eviction.

Signature \_\_\_\_\_ Executed on (Date) \_\_\_\_\_

All information provided to a PHA, owner or manager relating to the incident(s) of domestic violence, including the fact that an individual is a victim of domestic violence shall be retained in confidence by an owner and shall neither be entered into any shared database nor provided to any related entity, except to the extent that such disclosure is (i) requested or consented to by the individual in writing; (ii) required for use in an eviction proceeding or termination of assistance; or (iii) otherwise required by applicable law.

**Benton Township Housing Commission  
1216 Blossom Lane  
Benton Harbor, MI 49022**

April 22, 2008

Resolution No. 2219

**VIOLENCE AGAINST WOMEN ACT  
LEASE ADDENDUM**

**Protections Against Eviction**

1. VAWA states that an incident or incidents of actual or threatened domestic violence, dating violence, or stalking (as these terms are defined in VAWA) will not be considered to be a “serious or repeated” violation your lease if you are the victim of the incident or incidents of domestic violence, dating violence or stalking. This means you may not be evicted based on such an incident or incidents where you are the victim.

2. In addition, although the housing agency may evict you for certain types of criminal activity as provided in your lease, VAWA states that the housing agency may not evict you if the criminal activity is:

- (a) directly related to domestic violence, dating violence, or stalking; and
- (b) engaged in by a member of your household, or any guest, or another person under your control; and
- (c) you or a member of your immediate family is the victim of this criminal activity.

**Certification**

If the housing agency notifies you that it intends to terminate your tenancy based on an incident or incidents of domestic violence, dating violence, or stalking, and you claim protection against eviction under VAWA, the housing agency may require you to deliver a certification. You must deliver the certification within 14 business days after you receive the housing agency’s request for it. If you do not do this within the time allowed, you will not have any protection under VAWA and the agency may proceed with terminating your tenancy without reference to the VAWA protections.

You may certify either by:

- (a) completing and delivering a HUD–approved certification form which will be supplied to you by the housing agency; or
- (b) providing the housing agency with documentation signed by an employee, agent, or volunteer of a victim service provider, an attorney, or a medical professional from whom the victim (you or another member of your immediate family) has sought assistance in addressing domestic violence, dating violence, or stalking or the effects of the abuse. (This certification must be sworn under penalty of perjury); or
- (c) producing a Federal, State, tribal, territorial, or local police or court record.

## Confidentiality

Information you provide to the housing agency relating to the fact that you or another member of your household is a victim of domestic violence, dating violence, or stalking will be retained by the housing agency in confidence. This information will not be shared or disclosed by the agency without your consent except as necessary in an eviction proceeding or as otherwise required by law.

## Limitations

VAWA provides certain limitations and clarifications concerning your rights as described above. In particular, you should know that nothing contained in VAWA:

1. prevents the housing agency from terminating tenancy and evicting for any violation of a lease that is not based on a matter involving domestic violence, dating violence, or stalking for which VAWA provide protections as described above. However, the housing agency may not in such cases apply any stricter standard to you than to other tenants.
2. prevents the housing agency from terminating tenancy and evicting where the housing authority can demonstrate “an actual and imminent threat to other tenants or those employed at or providing service to the property.” Where such a threat can be demonstrated by the housing agency, you will not be protected from eviction by VAWA.
3. limits the ability of the housing agency to comply with court orders addressing rights of access to or control of the property. This includes civil protection orders entered for the protection of the victim or relating to the distribution or possession of property.
4. supersedes any Federal, State or local law that provides greater protections than VAWA.

## Housing Agency Right to Remove Perpetrator of Domestic of Violence

VAWA also creates a new authority under Federal law that allows a housing agency to evict, remove, or terminate assistance to any individual tenant or lawful occupant of public housing who engages in criminal acts of physical violence against family members or others. This may be done without evicting or taking any other action adverse to the other occupants.

## Further Information

The attached written policy contains, among other things, definitions of the terms “domestic violence,” dating violence,” stalking,” and “immediate family.”

\_\_\_\_\_  
Head of Household                      Date

\_\_\_\_\_  
Spouse or Other Adult                      Date

\_\_\_\_\_  
Housing Representative                      Date

\_\_\_\_\_  
Other Adult                      Date