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

PHA Plans

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

Tullahoma Housing Authority

James H. Rock
Executive Director

PHA Plan
Agency Identification

PHA Name: Tullahoma Housing Authority **PHA Number:** TN024

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: **269** Number of S8 units: Number of public housing units:
Number of S8 units: **116**

☐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: (state mission here)

B. Goals

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

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

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

☒ PHA Goal: Improve the quality of assisted housing
Objectives:
- ☒ Improve public housing management: (PHAS score) **85**
- ☒ Improve voucher management: (SEMAP score) **77**
- ☒ 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 de-concentrate 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 Tullahoma Housing Authority has completed this Agency Plan in consultation with both our residents, and the local community. The public is provided with an opportunity to review the plan and offer comments at a public hearing to be held on May 15, 2008. The Annual Agency Plan is summarized as follows:

1. Housing Needs
   Our current waiting list holds 175 applicants. Our greatest demand is for 1 bedroom units with 53% of our applicants on that list. 35% of our applicants are waiting for a 2 bedroom apartment, 9% are on the 3 bedroom list, and 3% are waiting for a 4 bedroom apartment. THA does not have any current plans to expand it's public housing stock.

2. Financial Resources
   Tullahoma Housing Authority expects to expend approximately $2,000,000 in FY 2008 for Operations, Capital Improvements and administrative costs.

3. Eligibility, Selection and Admission Policies
   The ACOP, Lease and all related policies have been revised to comply with the requirements of the Quality Housing and Work Responsibility Act (QHWRA). These revisions address de-concentration and income mixing, thereby encouraging higher income families in the developments. Although THA has provided incentives for higher income families, the majority of our applicants are from the very low and extremely low income levels. All policies are reviewed on a regular basis.

4. Rent Determination – Discretionary Policies
   The THA has had ceiling rents in place since 1989. During FY-2002 THA conducted an extensive rent comparability study in order to replace ceiling rents with appropriate Flat rents. Flat rents are set at $281, $323, $418 and $481 for one through four bedroom apartments at TN024-004, TN024-005 and TN024-006. Flat rents are set at $225, $258, $334 and $385 for one through four bedroom apartments at TN024-001 and TN024-002. Our minimum rent is $50.00 for both public housing and Section 8 Rental Assistance.

Payment standards for our Section 8 Program are now set between 100 and 105% of the current FMRs.

5. Operations and Management

All policies have been revised to comply with all mandated requirements of the QHWRA. THA has repeatedly changed methodologies in its pest control efforts. Recent adoption of a new approach has netted positive results in our ongoing efforts to reduce and eliminate pests, including cockroaches.

6. Grievance Procedure

The THA Grievance Procedures have been revised to comply with the QHWRA.

7. Capital Improvements

Our projected funding under the Public Housing Capital Program is from $350,000 to $400,000 annually. Our focus for the FY 2008 program year will continue to be modernization improvements primarily in projects TN024-001 and TN024-002.

8. Demolition and/or Disposition

THA has no current plans for demolition or disposition.

9. Designation

THA has the following apartments designated for the elderly and/or disabled:

Autumn Manor - TN024-004 - 58 units
Cedar Lane - TN024-005 - 28 units
Whispering Oaks - TN024-006 - 11 units

10. Conversion of Public Housing

THA has no current plans to designate any developments or buildings to tenant-based assistance.

11. Homeownership

THA has no current plans to develop a Homeownership Program. However, information and referrals are provided for our residents.

12. Self-Sufficiency Programs

THA has a very active and wide-ranging Resident Services program that includes activities to provide greater economic self-sufficiency in conjunction with the State's "Families First" welfare to work program. We anticipate a continuing reduction in these programs until PHDEP funding is restored.

13. Safety and Crime Prevention

Safety and Crime Prevention for THA can no longer be funded through the Public Housing Drug Elimination Program. Services will continue being provided to the extent feasible under current funding levels. THA utilizes a two-pronged approach by offering a wide array of anti-drug/anti-crime related programs, combined by employing a full-time police officer to work in our developments.

14. Ownership of Pets
THA has a pet policy that is in compliance with QHWRA requirements.

15. Civil Rights Certification
We have included the required certification regarding Fair Housing and Civil Rights in this Plan.

16. Annual Audit
Our most recent annual audit for fiscal year 2007 is on file at our local HUD office in Memphis, Tennessee, and is available for review at our main office during normal business hours.

17. Asset Management
It is the goal of THA to manage our assets (physical property, financial resources and manpower) as efficiently as possible to meet the intent of our mission statement. All applicable policies and procedures are in place to achieve this goal.

18. Violence Against Women Act
THA has a policy in place, as required by the VAWA of 2005, to assist victims of domestic violence, dating violence, sexual assault or stalking as those terms are defined in Section 3 of the U. S. Housing Act of 1937 as amended by VAWA
(42 U.S.C. 13925)

19. Limited English Proficiency
THA has a policy in place to afford meaningful access to all of our programs by persons with limited English proficiency.

iii. Annual Plan Table of Contents

[24 CFR Part 903.7 9 (r)]

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

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Attachments

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

Required Attachments:

☒ **H** Admissions Policy for Deconcentration (Section 3)
☒ FY 2007 Capital Fund Program Annual Statement (Section 7)
☐ Most recent board-approved operating budget (Required Attachment for PHAs that are troubled or at risk of being designated troubled ONLY)
☒ **C** List of Resident Advisory Board Members
☒ **B** List of Resident Board Member
☒ **F** Community Service Description of Implementation
☒ **E** Information on Pet Policy
☐ Section 8 Homeownership Capacity Statement, if applicable
☐ Description of Homeownership Programs, if applicable

Attachment A – Brief Statement of Progress in Meeting the 5-Year Plan Mission and Goals

Attachment D – Voluntary Conversion Required Initial Assessments

Attachment G – Follow-up Plan for Resident Survey

Attachment I – VAWA Compliance and Policy

Attachment J – Limited English Proficiency Policy

Optional Attachments:

- ☐ PHA Management Organizational Chart
- ☒ FY 2008 Capital Fund Program 5 Year Action Plan
- ☐ Public Housing Drug Elimination Program (PHDEP) Plan
- ☐ Comments of Resident Advisory Board or Boards (must be attached if not included in PHA Plan text)
- ☐ Other (List below, providing each attachment name)

Supporting Documents Available for Review

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

List of Supporting Documents Available for Review		
Applicable & On Display	**Supporting Document**	**Applicable Plan Component**
X	PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations	5 Year and Annual Plans
X	State/Local Government Certification of Consistency with the Consolidated Plan	5 Year and Annual Plans
X	Fair Housing Documentation: Records reflecting that the PHA has examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available, and worked or is working with local jurisdictions to implement any of the jurisdictions' initiatives to affirmatively further fair housing that require the PHA's involvement.	5 Year and Annual Plans
X	Consolidated Plan for the jurisdiction/s in which the PHA is located (which includes the Analysis of Impediments to Fair Housing Choice (AI))) and any additional backup data to support statement of housing needs in the jurisdiction	Annual Plan: Housing Needs
X	Most recent board-approved operating budget for the public housing program	Annual Plan: Financial Resources;
X	Public Housing Admissions and (Continued) Occupancy Policy (A&O), which includes the Tenant Selection and Assignment Plan [TSAP]	Annual Plan: Eligibility, Selection, and Admissions Policies
	Section 8 Administrative Plan	Annual Plan: Eligibility,

List of Supporting Documents Available for Review		
Applicable & On Display	**Supporting Document**	**Applicable Plan Component**
X		Selection, and Admissions Policies
X	Public Housing Deconcentration and Income Mixing Documentation: 1. PHA board certifications of compliance with deconcentration requirements (section 16(a) of the US Housing Act of 1937, as implemented in the 2/18/*99 Quality Housing and Work Responsibility Act Initial Guidance; Notice* and any further HUD guidance) and 2. Documentation of the required deconcentration and income mixing analysis	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public housing rent determination policies, including the methodology for setting public housing flat rents ☐ check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Schedule of flat rents offered at each public housing development ☐ check here if included in the public housing A & O Policy	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies ☐ check here if included in Section 8 Administrative Plan	Annual Plan: Rent Determination
X	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation)	Annual Plan: Operations and Maintenance
X	Public housing grievance procedures ☐ check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
X	Section 8 informal review and hearing procedures ☐ check here if included in Section 8 Administrative Plan	Annual Plan: Grievance Procedures
X	The HUD-approved Capital Fund/Comprehensive Grant Program Annual Statement (HUD 52837) for the active grant year	Annual Plan: Capital Needs
	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grant	Annual Plan: Capital Needs
X	Most recent, approved 5 Year Action Plan for the Capital Fund/Comprehensive Grant Program, if not included as an attachment (provided at PHA option)	Annual Plan: Capital Needs
	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
	Approved or submitted applications for demolition and/or disposition of public housing	Annual Plan: Demolition and Disposition
	Approved or submitted applications for designation of public housing (Designated Housing Plans)	Annual Plan: Designation of Public Housing
	Approved or submitted assessments of reasonable revitalization of public housing and approved or submitted conversion plans prepared pursuant to section 202 of the 1996 HUD Appropriations Act	Annual Plan: Conversion of Public Housing

List of Supporting Documents Available for Review		
Applicable & On Display	**Supporting Document**	**Applicable Plan Component**
	Approved or submitted public housing homeownership programs/plans	Annual Plan: Homeownership
	Policies governing any Section 8 Homeownership program ☐ check here if included in the Section 8 Administrative Plan	Annual Plan: Homeownership
X	Any cooperative agreement between the PHA and the TANF agency	Annual Plan: Community Service & Self-Sufficiency
	FSS Action Plan/s for public housing and/or Section 8	Annual Plan: Community Service & Self-Sufficiency
	Most recent self-sufficiency (ED/SS, TOP or ROSS or other resident services grant) grant program reports	Annual Plan: Community Service & Self-Sufficiency
	The most recent Public Housing Drug Elimination Program (PHEDEP) semi-annual performance report for any open grant and most recently submitted PHDEP application (PHDEP Plan)	Annual Plan: Safety and Crime Prevention
X	The most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the U.S. Housing Act of 1937 (42 U. S.C. 1437c(h)), the results of that audit and the PHA's response to any findings	Annual Plan: Annual Audit
	Troubled PHAs: MOA/Recovery Plan	Troubled PHAs
	Other supporting documents (optional) (list individually; use as many lines as necessary)	(specify as needed)

1. Statement of Housing Needs

[24 CFR Part 903.7 9 (a)]

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

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

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Afford-ability	Supply	Quality	Access-ability	Size	Location
Income <= 30% of AMI	180	5	5	5	3	2	2
Income >30% but <=50% of AMI	60	4	4	5	5	2	2
Income >50% but <80% of AMI	8	4	4	5	5	2	3
Elderly	12	4	4	5	5	2	3
Families with Disabilities	35	5	5	4	5	2	2
WHT R/1	208	5	4	5	4	2	2
BLK R/2	40	5	4	5	5	2	2
HISP E/1	2	5	4	5	5	2	2
NON-HISP E/2	246	5	4	5	5	2	2

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

☐ Consolidated Plan of the Jurisdiction/s
Indicate year:

☐ 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: **Current 2008 Public/Assisted Housing & Sec 8 waiting lists.**

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) ☐ Section 8 tenant-based assistance ☒ Public Housing ☐ Combined Section 8 and Public Housing ☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional) If used, identify which development/sub-jurisdiction:			
	# of families	% of total families	Annual Turnover
Waiting list total	175		105
Extremely low income <=30% AMI	125	71	
Very low income (>30% but <=50% AMI)	43	25	
Low income (>50% but <80% AMI)	7	4	
Families with children			
Elderly families	9	5	
Families with Disabilities	17	10	
WHT R/1	148	85	
BLK R/2	27	15	
HISP E/1	0	0	
NON-HISP E/2	175	100	
Characteristics by Bedroom Size (Public Housing Only)			
1BR	92	53	31
2 BR	62	35	42
3 BR	16	9	30
4 BR	5	3	2
5 BR	0	0	0
5+ BR	0	0	0

Housing Needs of Families on the Waiting List
Is the waiting list closed (select one)? ☒ No ☐ Yes If yes: How long has it been closed (# of months)? **NA** Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☐ Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☐ Yes

Housing Needs of Families on the Waiting List

Waiting list type: (select one)
☒ Section 8 tenant-based assistance
☐ Public Housing
☐ Combined Section 8 and Public Housing
☐ Public Housing Site-Based or sub-jurisdictional waiting list (optional)
If used, identify which development/sub-jurisdiction:

	# of families	% of total families	Annual Turnover
Waiting list total	73		25
Extremely low income <=30% AMI	55		
Very low income (>30% but <=50% AMI)	17		
Low income (>50% but <80% AMI)	1		
Families with children	45		
Elderly families	3		
Families with Disabilities	18		
WHT R/1	60		
BLK R/2	13		
HISP E/1	2		
NON-HISP E/2	71		
Characteristics by Bedroom Size (Public Housing Only)			
1BR			
2 BR			
3 BR			
4 BR			
5 BR			
5+ BR			

Housing Needs of Families on the Waiting List
Is the waiting list closed (select one)? ☐ No ☒ Yes If yes: How long has it been closed (# of months)? **5** Does the PHA expect to reopen the list in the PHA Plan year? ☐ No ☒ Yes Does the PHA permit specific categories of families onto the waiting list, even if generally closed? ☐ No ☒ Yes

C. Strategy for Addressing Needs

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

(1) Strategies

Need: Shortage of affordable housing for all eligible populations

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

Select all that apply

☒ Employ effective maintenance and management policies to minimize the number of public housing units off-line
☒ Reduce turnover time for vacated public housing units
☒ Reduce time to renovate public housing units
☐ Sek 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.

Financial Resources: Planned Sources and Uses		
Sources	**Planned $**	**Planned Uses**
1. **Federal Grants (FY 2008 grants)**		
a) Public Housing Operating Fund	646,822	
b) Public Housing Capital Fund	381,191	
c) HOPE VI Revitalization	0	
d) HOPE VI Demolition	0	
e) Annual Contributions for Section 8 Tenant-Based Assistance	432,340	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)	0	
g) Resident Opportunity and Self-Sufficiency Grants	0	
h) Community Development Block Grant	0	
i) HOME	0	
Other Federal Grants (list below)	0	
2. Prior Year Federal Grants (unobligated funds only) (list below)		
FY-2007	224,056	Physical & Mgmt Imp.
3. Public Housing Dwelling Rental Income	500,600	Mgmt & Maint Ops.
4. Other income (list below)		
Excess Utilities	9,900	Utilities
Non-Dwelling Rent	1,980	Operations
Investments	12,850	Operations
Other Op Receipts	21,850	Operations
4. Non-federal sources (list below)		
Operating Reserve	710,333	Unexpected Needs
Total resources	2,941,922	PHA Operations

3. PHA Policies Governing Eligibility, Selection, and Admissions

[24 CFR Part 903.7 9 (c)]

A. Public Housing

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

(1) Eligibility

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

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

- Begin immediately at time of application.

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

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

- Violent behavior
- Rape/Sex offender
- Record of Serious disturbances
- Alcohol related criminal activities
- False information and refusal to complete forms

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?

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

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

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

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

(3) Assignment

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

☒ One
☐ Two
☐ Three or More

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

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

(4) Admissions Preferences

a. Income targeting:

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

b. Transfer policies:
In what circumstances will transfers take precedence over new admissions? (list below)

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

c. Preferences

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

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

Former Federal preferences:

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

Other preferences: (select below)

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

  - Elderly & Disabled for elderly and disabled units
  - Near Elderly for elderly developments and units
  - Handicapped persons for handicap accessible units

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.

6 Date and Time

Former Federal preferences:
2 Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
3 Victims of domestic violence
6 Substandard housing
6 Homelessness
6 High rent burden

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

- Elderly & Disabled for elderly and disabled units
- Near Elderly for elderly developments and units
- Handicapped persons for handicap accessible units

4. Relationship of preferences to income targeting requirements:
☐ The PHA applies preferences within income tiers
☒ Not applicable: the pool of applicant families ensures that the PHA will meet income targeting requirements

(5) Occupancy

a. What reference materials can applicants and residents use to obtain information about the rules of occupancy of public housing (select all that apply)
☒ The PHA-resident lease
☒ The PHA's Admissions and (Continued) Occupancy policy
☒ PHA briefing seminars or written materials
☐ Other source (list)

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

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

(6) Deconcentration and Income Mixing

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

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

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

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

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

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

- TN024-001
- TN024-005

☐ 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)

As noted under Capital Improvement Needs in Component 7 of this plan, a major interior/exterior renovation project has been programmed for Dossett and Carver Homes. It is hoped that major modernization improvements will help to encourage applicant families whose income is above the Established Income Range to accept units in these developments.

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:

- TN024-001

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:

- TN024-005

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)

- Outstanding debts to other PHAs
- False information and/or refusal to complete forms

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)

- Names of previous landlords
- Previous rental history

(2) Waiting List Organization

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

☒ 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:

- Will extend up to the maximum allowable voucher term of 120 days. Very often necessary in order to find acceptable units within Rent Ranges.

(4) Admissions Preferences

a. Income targeting

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

b. Preferences

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

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

Former Federal preferences

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

Other preferences (select all that apply)

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

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

1 Date and Time

Former Federal preferences

1 Involuntary Displacement (Disaster, Government Action, Action of Housing Owner, Inaccessibility, Property Disposition)
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)
☐ 95th percentile rents
☐ 75 percent of operating costs
☐ 100 percent of operating costs for general occupancy (family) developments
☐ Operating costs plus debt service
☐ The "rental value" of the unit
☐ Other (list below)

f. Rent re-determinations:

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

☐ Never
☐ At family option
☒ Any time the family experiences an income increase
☐ Any time a family experiences an income increase above a threshold amount or percentage: (if selected, specify threshold)_____

☐ Other (list below)

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

(2) Flat Rents

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 below100% 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 sub market
☐ 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 sub market
☒ 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.
☒ A brief description of the management structure and organization of the PHA follows:

A five member Board of Commissioners governs Tullahoma Housing Authority. The Mayor of the City of Tullahoma appoints the Commissioners to five-year terms. The Board hires the Executive Director, and together with the Executive Director, sets the policy and direction of the Housing Authority. Reporting directly to the Executive Director, and responsible for their respective program areas are: the Bookkeeper, Public

Housing Manager, Maintenance Supervisor, Section 8 Program Manager, Modernization Coordinator, and Resident Services Coordinator.

B. HUD Programs Under PHA Management

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

Program Name	Units or Families Served at Year Beginning	Expected Turnover
Public Housing	269	105
Section 8 Vouchers	116	25
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)		

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)

- Dwelling Lease
- Admissions & Continued Occupancy Policy (ACOP)
- Grievance Policy
- Resident Charges for Abuse
- Resident Utility Allowances
- Pet Policy
- Community Room Policy

- UPCS Inspection Checklist
- Maintenance Policy (Including Pest Control/Extermination)
- Annual Maintenance Plan
- Disposition Policy
- Procurement Policy
- Capitalization Policy
- Personnel Policy
- Job Descriptions
- Internal Control Procedures
- Operating Budget and Subsidy Schedule
- Capital Fund Grant Plan and Budget
- Public Housing Agency Plans (5-Year and Annual)
- Public Housing Management Assessment Certification and Score
- HUD Regulations, Notices, and Circular Letters
- Investment Policy
- Safety Policy
- Gas Emergency Manual
- Gas O&M Plan
- Community Service Policy
- Lead-Based Paint Policy
- Resident Initiatives Policy
- Relocation Policy
- Annual Contributions Contract (ACC) & Amendments with HUD
- Non-Profit Corporation Act and Charter
- Tullahoma Housing Authority By-Laws
- Cooperation Agreement Between THA and the City of Tullahoma
- Violence Against Women Policy
- Limited English Proficiency Policy

(2) Section 8 Management: (list below)

- Section 8 Administrative Plan
- All applicable policies listed above

These documents are available at the Tullahoma Housing Authority Office located at 2401 Cedar Lane Village Drive, Tullahoma, Tennessee

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 (state name)

-or-

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

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

PHA Name:	Grant Type and Number	Federal FY of Grant:
Tullahoma Housing Authority	Capital Fund Program Grant No: TN43P02450108 Replacement Housing Factor Grant No:	2008

☒ **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	0			
2	1406 Operations	0			
3	1408 Management Improvements	60,000			
4	1410 Administration	15,829			
5	1411 Audit	0			
6	1415 Liquidated Damages	0			
7	1430 Fees and Costs	35,500			
8	1440 Site Acquisition	0			
9	1450 Site Improvement	5,000			
10	1460 Dwelling Structures	257,362			
11	1465.1 Dwelling Equipment—Nonexpendable	0			
12	1470 Non-dwelling Structures	7000			
13	1475 Non-dwelling Equipment	500			
14	1485 Demolition	0			
15	1490 Replacement Reserve	0			
16	1492 Moving to Work Demonstration	0			
17	1495.1 Relocation Costs	0			
18	1499 Development Activities	0			
19	1501 Collateralization or Debt Service	0			
20	1502 Contingency	0			
21	Amount of Annual Grant: (sum of lines 2 – 20)	**$ 381,191**			
22	Amount of line 21 Related to LBP Activities	15,000			
23	Amount of line 21 Related to Section 504 compliance	0			
24	Amount of line 21 Related to Security – Soft Costs	0			

form **HUD 50075** (03/2006)

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

PHA Name:	Grant Type and Number	Federal FY of Grant:
Tullahoma Housing Authority	Capital Fund Program Grant No: TN43P02450108 Replacement Housing Factor Grant No:	2008

☒ 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
25	Amount of Line 21 Related to Security – Hard Costs	0			
26	Amount of line 21 Related to Energy Conservation Measures	0			

form **HUD 50075** (03/2006)

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

PHA Name: Tullahoma Housing Authority		**Grant Type and Number** Capital Fund Program Grant No: TN43P02450108 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	
PHA-WIDE	Resident Services Coordinator	1408	Lump Sum	30,000				
PHA-WIDE	Police Officer	1408	Lump Sum	30,000				
PHA-WIDE	Advertisements	1410	Lump Sum	829				
PHA-WIDE	Clerk of the Works	1410	Lump Sum	15,000				
PHA-WIDE	Mod Coordinator	1430	Lump Sum	29,000				
PHA-WIDE	A&E Services	1430	Lump Sum	0				
PHA-WIDE	Environmental Testing/Monitoring	1430	Lump Sum	6,500				
PHA-WIDE	Drainage, Parking, Landscaping, Walks & Handrails	1450	Lump Sum	5,000				
PHA-WIDE	Interior Painting	1460	Lump Sum	30,000				
PHA-WIDE	Maintenance Tools & Equipment	1475	Lump Sum	500				

form **HUD 50075** (03/2006)

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

PHA Name: Tullahoma Housing Authority		**Grant Type and Number** Capital Fund Program Grant No: TN43P02450108 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	
TN024-01	Fascia, Soffitt, Siding & Porch Imp. (LBP)	1460	12 DU	78,000				
TN024-01	Re-Roof	1460	12 DU	34,762				
TN024-01	Gutters/Downspouts	1460	12 DU	9,000				
TN024-01	Stucco Finish	1460	12 DU	14,400				
TN024-01	Paint Bricks	1460	12 DU	14,400				
TN024-01	Exterior Doors & Hardware	1460	12 DU	21,000				
TN024-01	Storm Doors	1460	12 DU	9,600				
TN024-01	Shutters	1460	12 DU	3,000				
TN024-01	Exterior Lights	1460	12 DU	3,000				
TN024-01	Meter Bases	1460	12 DU	10,800				
TN024-01	Windows	1460	12 DU	29,400				
TN024-01	Paint Maintenance Shop	1470	1 EA	7,000				
	Total Program			**$ 381,191**				

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

PHA Name: Tullahoma Housing Authority	**Grant Type and Number** Capital Fund Program No: TN43P02450108 Replacement Housing Factor No:	**Federal FY of Grant:** 2008

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	
PHA-WIDE	09/30/2010			09/30/2012			
TN024-01	09/30/2010			09/30/2012			

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

PHA Name:	Grant Type and Number	Federal FY of Grant:
Tullahoma Housing Authority	Capital Fund Program Grant No: TN43P02450107 Replacement Housing Factor Grant No:	2007

☐ Original Annual Statement ☐ Reserve for Disasters/ Emergencies ☐ Revised Annual Statement (revision no:)
☒ Performance and Evaluation Report for Period Ending:03/31/08 ☐ 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	0	0	0	0
2	1406 Operations	0	0	0	0
3	1408 Management Improvements	60,000	60,000	60,000.00	20,238.66
4	1410 Administration	15,558	15,556	15,000.00	5,000.00
5	1411 Audit	0	0		
6	1415 Liquidated Damages	0	0		
7	1430 Fees and Costs	31,000	44,000	28,000.00	9,332.00
8	1440 Site Acquisition	0	0		
9	1450 Site Improvement	5,000	1,000		
10	1460 Dwelling Structures	251,471	186,500	30,000.00	4,663.00
11	1465.1 Dwelling Equipment—Nonexpendable	0	0		
12	1470 Non-dwelling Structures	0	50,000		
13	1475 Non-dwelling Equipment	17,000	22,973	22,973.00	22,973.00
14	1485 Demolition	0	0		
15	1490 Replacement Reserve	0	0		
16	1492 Moving to Work Demonstration	0	0		
17	1495.1 Relocation Costs	0	0		
18	1499 Development Activities	0	0		
19	1501 Collateralization or Debt Service	0	0		
20	1502 Contingency	0	0		
21	Amount of Annual Grant: (sum of lines 2 – 20)	**$ 380,029**	**$ 380,029**	**155,973.00**	**62,206.66**

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

PHA Name:	Grant Type and Number	Federal FY of Grant:
Tullahoma Housing Authority	Capital Fund Program Grant No: TN43P02450107 Replacement Housing Factor Grant No:	2007

☐ Original Annual Statement ☐ Reserve for Disasters/ Emergencies ☐ Revised Annual Statement (revision no:)
☒ Performance and Evaluation Report for Period Ending:03/31/08 ☐ Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
22	Amount of line 21 Related to LBP Activities	0	14,500	0	0
23	Amount of line 21 Related to Section 504 compliance	0	0	0	0
24	Amount of line 21 Related to Security – Soft Costs	0	0	0	0
25	Amount of Line 21 Related to Security – Hard Costs	0	0	0	0
26	Amount of line 21 Related to Energy Conservation Measures	0	100,500	0	0

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

PHA Name: Tullahoma Housing Authority		**Grant Type and Number** Capital Fund Program Grant No: TN43P02450107 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	
PHA-WIDE	Resident Services Coordinator	1408	Lump Sum	30,000	30,000	30,000	12,514.56	In Process
PHA-WIDE	Police Officer	1408	Lump Sum	30,000	30,000	30,000	7,724.10	In Process
PHA-WIDE	Advertisements	1410	Lump Sum	558	556	0	0	
PHA-WIDE	Clerk of the Works	1410	Lump Sum	15,000	15,000	15,000	5,000.00	In Process
PHA-WIDE	Mod Coordinator	1430	Lump Sum	28,000	28,000	28,000	9,332.00	In Process
PHA-WIDE	A&E Services	1430	Lump Sum	0	10,000	0	0	Planning
PHA-WIDE	Environmental Testing/Monitoring	1430	Lump Sum	3,000	6,000	0	0	Planning
PHA-WIDE	Drainage, Parking, Landscaping, Walks & Handrails	1450	Lump Sum	5,000	1,000	0	0	Planning
PHA-WIDE	Interior Painting	1460	Lump Sum	30,000	30,000	30,000	4,663.00	In Process
PHA-WIDE	Maintenance Tools & Equipment: Concrete Grinder	1475	Lump Sum	2,000	0	0	0	Deleted
PHA-WIDE	Maintenance Vehicle	1475	Lump Sum	15,000	22,973	22,973	22,973.00	Complete
TN024-04	Paint Building Exterior	1460	58 DU	17,000	17,000	0	0	Planning
TN024-04	Install HVAC Housings	1460	58 DU	20,000	1,000	0	0	Planning
TN024-04	Install Windows	1460	58 DU	87,971	94,000	0	0	Planning

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

PHA Name: Tullahoma Housing Authority		**Grant Type and Number** Capital Fund Program Grant No: TN43P02450107 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	
TN024-01	Fascia, Soffit, Siding & Porch Imp. (LBP)	1460	6 DU	33,000	14,500	0	0	Planning
TN024-01	Re-Roof	1460	6 DU	9,000	4,500	0	0	Planning
TN024-01	Gutters/Downspouts	1460	6 DU	4,000	2,000	0	0	Planning
TN024-01	Stucco Finish	1460	6 DU	6,000	3,000	0	0	Planning
TN024-01	Paint Bricks	1460	6 DU	6,000	3,000	0	0	Planning
TN024-01	Exterior Doors & Hardware	1460	6 DU	10,000	5,000	0	0	Planning
TN024-01	Storm Doors	1460	6 DU	4,500	2,500	0	0	Planning
TN024-01	Shutters	1460	6 DU	1,500	500	0	0	Planning
TN024-01	Exterior Lights	1460	6 DU	1,500	500	0	0	Planning
TN024-01	Meter Bases	1460	2 EA	5,000	2,500	0	0	Planning
TN024-01	Windows	1460	6 DU	16,000	6,500	0	0	Planning
TN024-05	Comm. Center Addition (5yr Plan)	1470	1	0	50,000	0	0	Planning

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

PHA Name: Tullahoma Housing Authority		**Grant Type and Number** Capital Fund Program Grant No: TN43P02450107 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	
	Total Program			**380,029**	**380,029**	**155,973.00**	**62,206.66**	

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

PHA Name: Tullahoma Housing Authority	**Grant Type and Number** Capital Fund Program No: TN43P02450107 Replacement Housing Factor No:	**Federal FY of Grant:** 2007

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	
PHA-WIDE	07/31/2009			07/31/2011			
TN024-01	07/31/2009			07/31/2011			
TN024-02	07/31/2009			07/31/2011			
TN024-04	07/31/2009			07/31/2011			

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

PHA Name: TULLAHOMA HOUSING AUTHORITY	Grant Type and Number Capital Fund Program Grant No: **TN43P02450106** Replacement Housing Factor Grant No:	Federal FY of Grant: 2006

☐Original Annual Statement ☐Reserve for Disasters/ Emergencies ☐Revised Annual Statement (revision no:)
☒Performance and Evaluation Report for Period Ending: 03/31/2008 ☐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	0	0	0	0
2	1406 Operations	0	0	0	0
3	1408 Management Improvements	60,000	58,422.90	58,422.90	58,422.90
4	1410 Administration	15,000	15,295.83	15,295.83	15,295.83
5	1411 Audit	0	0	0	0
6	1415 Liquidated Damages	0	0	0	0
7	1430 Fees and Costs	28,000	53,311.02	53,311.02	20,997.00
8	1440 Site Acquisition	0	0	0	0
9	1450 Site Improvement	65,226.03	80,750.81	80,750.81	61,890.81
10	1460 Dwelling Structures	209,675.97	126,678.00	126,678.00	126,678.00
11	1465.1 Dwelling Equipment—Nonexpendable	0	0	0	0
12	1470 Non-dwelling Structures	0	43,175.97	43,175,.97	43,175.97
13	1475 Non-dwelling Equipment	0	267.47	267.47	267.47
14	1485 Demolition	0	0	0	0
15	1490 Replacement Reserve	0	0	0	0
16	1492 Moving to Work Demonstration	0	0	0	0
17	1495.1 Relocation Costs	0	0	0	0
18	1499 Development Activities	0	0	0	0
19	1501 Collateralization or Debt Service	0	0	0	0
20	1502 Contingency	0	0	0	0
21	Amount of Annual Grant: (sum of lines 2 – 20)	**377,902**	**377,902**	**377,902.00**	**326,727,.98**

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

PHA Name: TULLAHOMA HOUSING AUTHORITY	Grant Type and Number Capital Fund Program Grant No: **TN43P02450106** Replacement Housing Factor Grant No:	Federal FY of Grant: 2006

☐Original Annual Statement ☐Reserve for Disasters/ Emergencies ☐Revised Annual Statement (revision no:)
☒Performance and Evaluation Report for Period Ending: 03/31/2008 ☐Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost		Total Actual Cost	
		Original	Revised	Obligated	Expended
22	Amount of line 21 Related to LBP Activities	0	0	0	0
23	Amount of line 21 Related to Section 504 compliance	0	0	0	0
24	Amount of line 21 Related to Security – Soft Costs	0	0	0	0
25	Amount of Line 21 Related to Security – Hard Costs	0	0	0	0
26	Amount of line 21 Related to Energy Conservation Measures	0	0	0	0

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

PHA Name: **Tullahoma Housing Authority**	**Grant Type and Number** Capital Fund Program Grant No: : **TN43P02450106** 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	
PHA-WIDE	Resident Services Coordinator	1408	Lump Sum	30,000	26,474.28	26,474.28	26,474.28	Complete
PHA-WIDE	Police Officer	1408	Lump Sum	30,000	31,948.62	31,948.62	31,948.62	Complete
PHA-WIDE	Advertisements	1410	Lump Sum	0	295.83	295.83	295.83	Complete
PHA-WIDE	Clerk of the Works/Admin. Personnel	1410	Lump Sum	15,000	15,000.00	15,000.00	15,000.00	Complete
PHA-WIDE	Mod Coordinator	1430	Lump Sum	28,000	53,311.02	53,311.02	20,997.00	In Process
PHA-WIDE	A&E Services	1430	Lump Sum	0	0	0	0	Deleted
PHA-WIDE	Environmental Testing/Monitoring	1460	Lump Sum	0	0	0	0	Deleted
PHA-WIDE	Drainage, Parking, Landscaping, Walks & Handrails	1450	Lump Sum	11,973	30,833.00	30,833.00	11973.00	In Process
PHA-WIDE	Interior Painting	1460	Lump Sum	30,000	22,678.00	22,678.00	22,678.00	Complete
PHA-WIDE	Maintenance Tools & Equipment	1475	Lump Sum	0	0	0	0	Deleted

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

PHA Name: **Tullahoma Housing Authority**		**Grant Type and Number** Capital Fund Program Grant No: : **TN43P02450106** 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	
TN024-02	Remove Rear Sidewalks	1450	Lump Sum	0	0	0	0	Deleted
TN024-04	Paint Building Exterior	1460	58 DU	15,000	0	0	0	Deleted
TN024-04	Install HVAC Housings	1460	58 DU	17,500	0	0	0	Deleted
TN024-01	Fascia, Soffit, Siding & Porch Imp. (LBP)	1460	8 DU	32,000	32,000.00	32,000.00	32,000.00	Complete
TN024-01	Re-Roof	1460	8 DU	12,000	12,000.00	12,000.00	12,000.00	Complete
TN024-01	Gutters/Downspouts	1460	8 DU	0	0	0	0	Deleted
TN024-01	Stucco Finish	1460	8 DU	8,000	8,000.00	8,000.00	8,000.00	Complete
TN024-01	Paint Bricks	1460	8 DU	8,000	9,000.00	9,000.00	9,000.00	Complete
TN024-01	Exterior Doors & Hardware	1460	8 DU	13,000	13,000.00	13,000.00	13,000.00	Complete
TN024-01	Storm Doors	1460	8 DU	6,500	6,500.00	6,500.00	6,500.00	Complete
TN024-01	Shutters	1460	8 DU	2,500	2,500.00	2,500.00	2,500.00	Complete
TN024-01	Exterior Lights	1460	8 DU	2,000	2,000.00	2,000.00	2,000.00	Complete
TN024-01	Meter Bases	1460	2 EA	3,000	3,000.00	3,000.00	3,000.00	Complete
TN024-01	Playground Equipment	1450	2 EA	53,253.03	49,917.81	49,917.81	49,917.81	Complete
TN024-01	Windows	1460	8 DU	17,000	16,000.00	16,000.00	16,000.00	Complete
TN024-01	Security Screens	1460	8 DU	0	0	0	0	Deleted
	From 5-Year Plan							
TN024-04	Interior Renovations	1470	LS	43,175.97	43,175.97	43,175.97	43,175.97	Complete

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

PHA Name: **Tullahoma Housing Authority**		**Grant Type and Number** Capital Fund Program Grant No: : **TN43P02450106** 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	
TN024-04	Interior Furnishings	1475	LS	0	267.47	267.47	267.47	Complete
	Total Program			**377,902**	**377,902**	**377,902**	**326,727.98**	

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

PHA Name: **Tullahoma Housing Authority**	**Grant Type and Number** Capital Fund Program No: : **TN43P02450106** 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	
PHA-WIDE	07/18/2008			07/17/2010			
TN024-01	07/18/2008			07/17/2010			
TN024-02	07/18/2008			07/17/2010			
TN024-04	07/18/2008			07/17/2010			

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(2) Optional 5-Year Action Plan

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

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

b. If yes to question a, select one:

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

-or-

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

Capital Fund Program Five-Year Action Plan

Part I: Summary

PHA Name Tullahoma Housing Authority				☒**Original 5-Year Plan** ☐**Revision No:**	
Development Number/Name/HA-Wide	Year 1	Work Statement for Year 2 FFY Grant: 2009 PHA FY: 2009	Work Statement for Year 3 FFY Grant: 2010 PHA FY: 2010	Work Statement for Year 4 FFY Grant: 2011 PHA FY: 2011	Work Statement for Year 5 FFY Grant: 2012 PHA FY: 2012
	Annual Statement				
PHA-WIDE		146,829	146,829	220,029	143,058
TN024-01		234,362	234,362		90,000
TN024-02					18,000
TN024-04				17,000	
TN024-05				71,162	67,162
TN024-06				73,000	62,971
CFP Funds Listed for 5-year planning		**$ 381,191**	**$ 381,191**	**$ 381,191**	**$ 381,191**
Replacement Housing Factor Funds		0	0	0	0

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Capital Fund Program Five-Year Action Plan

Part II: Supporting Pages—Work Activities

Activities for Year 1	Activities for Year :__2__ FFY Grant: 2009 PHA FY: 2009			Activities for Year: __3_ FFY Grant: 2010 PHA FY: 2010		
	Development Name/Number	**Major Work Categories**	Estimated Cost	**Development Name/Number**	**Major Work Categories**	**Estimated Cost**
See						
Annual	PHA-WIDE	***Management Imp.***	60,000	PHA-WIDE	***Management Imp.***	60,000
Statement	PHA-WIDE	Administrative	15,829	PHA-WIDE	Administrative	15,829
	PHA-WIDE	Professional	35,500	PHA-WIDE	Professional	35,500
	PHA-WIDE	Misc. Site Work	5,000	PHA-WIDE	Misc. Site Work	5,000
	PHA-WIDE	Interior Painting	30,000	PHA-WIDE	Interior Painting	30,000
	PHA-WIDE	Maint. Tools & Equip.	500	PHA WIDE	Maint. Tools & Equip.	500
	TN024-01	Exterior Renovations: Stucco, Paint. Doors, Lights, Roofs, Etc. (12)	234,362	TN024-01	Exterior Renovations: Stucco, Paint. Doors, Lights, Roofs, Etc. (12)	234,362
Total CFP Estimated Cost			**$ 381,191**			**$ 381,191**

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Capital Fund Program Five-Year Action Plan

Part II: Supporting Pages—Work Activities

Activities for Year :__4__ FFY Grant: 2011 PHA FY: 2011			Activities for Year: __5_ FFY Grant: 2012 PHA FY: 2012		
Development Name/Number	**Major Work Categories**	Estimated Cost	**Development Name/Number**	**Major Work Categories**	**Estimated Cost**
PHA-WIDE	***Management Imp.***	60,000	PHA-WIDE	***Management Imp.***	60,000
PHA-WIDE	Administrative	558	PHA-WIDE	Administrative	15,558
PHA-WIDE	Professional	30,000	PHA-WIDE	Professional (A&E)	67,500
PHA-WIDE	Computers/ Office Equip.	15,000	TN024-01	Storage Buildings	90,000
PHA-WIDE	Vehicle	15,000	TN024-02	Storage Buildings	18,000
PHA-WIDE	Stoves, Refrigerators & Water Heaters	5,000	TN024-05	Storage Buildings	67,162
PHA-WIDE	Gas, Water & Sewer Line Upgrades. Misc. Site Work	20,000	TN024-06	Roofs	62,971
PHA-WIDE	Interior Paint	30,000			
PHA-WIDE	Misc. Flooring	12,000			
PHA-WIDE	Lighting	5,000			
PHA-WIDE	Doors & Hardware	5,000			
PHA-WIDE	Misc. HVAC	9,500			
PHA WIDE	Misc. Roofing	12,971			
TN024-04	Replace Carpet	12,000			
TN024-04	Elevators	5,000			
TN024-06	Playground	25,000			
TN024-05	Replace HVAC (50%)	71,162			
TN024-06	Replace HVAC (50%)	48,000			
Total CFP Estimated Cost		**$ 381,191**			**$ 381,191**

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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.)

Demolition/Disposition Activity Description
1a. Development name: 1b. Development (project) number:
2. Activity type: Demolition ☐ Disposition ☐
3. Application status (select one) Approved ☐ Submitted, pending approval ☐ Planned application ☐
4. Date application approved, submitted, or planned for submission: (DD/MM/YY)
5. Number of units affected: 6. Coverage of action (select one) ☐ Part of the development ☐ 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.

Designation of Public Housing Activity Description
1a. Development name: 1b. Development (project) number:
2. Designation type: Occupancy by only the elderly ☐ Occupancy by families with disabilities ☐ Occupancy by only elderly families and families with disabilities ☐
3. Application status (select one) Approved; included in the PHA's Designation Plan ☐ Submitted, pending approval ☐ Planned application ☐
4. Date this designation approved, submitted, or planned for submission: (DD/MM/YY)
5. If approved, will this designation constitute a (select one) ☐ New Designation Plan ☐ Revision of a previously-approved Designation Plan?
6. Number of units affected: 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.

Conversion of Public Housing Activity Description
1a. Development name: 1b. Development (project) number:
2. What is the status of the required assessment? ☐ Assessment underway ☐ Assessment results submitted to HUD ☐ Assessment results approved by HUD (if marked, proceed to next question) ☐ Other (explain below)
3. ☐ Yes ☐ 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) ☐ Conversion Plan in development ☐ Conversion Plan submitted to HUD on: (DD/MM/YYYY) ☐ Conversion Plan approved by HUD on: (DD/MM/YYYY) ☐ 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:
2. Federal Program authority: ☐ HOPE I ☐ 5(h) ☐ Turnkey III ☐ Section 32 of the USHA of 1937 (effective 10/1/99)
3. Application status: (select one) ☐ Approved; included in the PHA's Homeownership Plan/Program

☐ Submitted, pending approval ☐ Planned application
4. Date Homeownership Plan/Program approved, submitted, or planned for submission: (DD/MM/YYYY)
5. Number of units affected: 6. Coverage of action: (select one) ☐ Part of the development ☐ Total development

B. Section 8 Tenant Based Assistance

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

2. Program Description:

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 (l)]

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

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)
Adult Computer Training	10	Response to Announcement	Adult Learning Center	Both
Homeownership Program	15	Response To Announcement	Cedar Lane Community Center	Both
"Families First"	57	TANF Recipients	DHS & THA Resident Services Department	Public Housing
Microwave Cooking Classes	30	Elderly and Disabled	Autumn Manor & Cedar Lane Community Centers	Public Housing
Head Start	10	Letters & School Announcements	Dossett Community Center	Both
GED Preparation Classes	10	Families First Participants	Adult Learning Center and Motlow State CC	Both
Better Money Management	10	Response to announcement	Cedar Lane Community Center	Both

(2) Family Self Sufficiency program/s

a. Participation Description

Family Self Sufficiency (FSS) Participation		
Program	Required Number of Participants (start of FY 2005 Estimate)	Actual Number of Participants (As of: DD/MM/YY)
Public Housing	Not Required	
Section 8	Not Required	

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

See Attachment "F"

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)

Dossett Homes (TN024-01)

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

1. List the crime prevention activities the PHA has undertaken or plans to undertake: (select all that apply)
☒ Contracting with outside and/or resident organizations for the provision of crime- and/or drug-prevention activities
☐ Crime Prevention Through Environmental Design
☒ Activities targeted to at-risk youth, adults, or seniors
☒ Volunteer Resident Patrol/Block Watchers Program
☐ Other (describe below)

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

Dossett Homes (TN024-01)

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)

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

Dossett Homes (TN024-01)

D. Additional information as required by PHDEP/PHDEP Plan

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

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

14. RESERVED FOR PET POLICY

[24 CFR Part 903.7 9 (n)]

See Attachment "E"

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?____
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:

Comment was to replace Community Center renovations at TN024-05 with playground equipment for TN024-06, since the community center renovations were addressed elsewhere in the plan

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)

Year 2011 Community Center renovations at TN024-05 were replaced with playground equipment for TN024-06.

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: State of Tennessee

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)

- **Preserve existing affordable housing stock**
- **Promote economic self-sufficiency/welfare to work**
- **Promote crime prevention, security, and safety**
- **Insure equal housing and employment opportunities**
- **Provide housing for special needs persons**
- **Promote and conserve energy resources**

☒ Other: (list below)

- **The State of Tennessee has reviewed the PHA Plans and has found them to be consistent with the States' Consolidated Plan.**

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.

DEFINITION OF SUBSTANTIAL DEVIATION and SIGNIFICANT AMENDMENT or MODIFICATION

In accordance with the Final Public Housing Agency Plans Regulations, 24 CFR Part 903, Section 903.7 ® (2), the PHA establishes the following basic criteria for a "substantial deviation" and "significant" amendment or modification.

1. The THA will consider a "substantial deviation" to be a change in the Mission, Goals, and Objectives of the PHA Plans that is duly determined by the board of Commissioners and the Resident Advisory Board to be a deviation from the latest approved PHA Plans. If the Board of Commissioners and the Resident Advisory Board considers the change(s) in the Mission, Goals, and Objectives to be substantial, in their determination, the Plans will be submitted to HUD for review and approval.

2. In addition, if there is a change in funding of greater than 20 percent of the Operating Budget and/or Capital Fund amount, this will be considered an amendment/modification to the Plans, except for emergencies that are beyond the control of the PHA. If the item/activity is included in the 5-year Capital Improvements Program, it will not be considered a significant change although the cost may exceed the 20 percent threshold; therefore, not requiring HUD review and approval.

19. PUBLIC HEARING:

A Public Hearing was held at 5:00 p.m., May 15, 2008 in the Cedar Lane Village Community Center, 301 Cedar Lane Village Drive, Tullahoma, Tennessee. Attending the meeting were 18 residents from four different THA housing complexes, and all five THA Commissioners, along with several members of the THA staff. During and after the hearing there were numerous comments made by residents, and general satisfaction expressed about planned Capital Fund expenditures.
The only comment to suggest a change in the plan, was to replace the Community Center Renovations at Cedar Lane (TN024-05) with playground equipment for Whispering Oaks (TN024-06), since the Community Center Renovations were already addressed elsewhere in the plan. The sign-in sheet and complete minutes for this hearing are on file and available at the THA main office.

Attachment A

BRIEF STATEMENT OF PROGRESS IN MEETING THE 5-YEAR PLAN MISSION AND GOALS

Tullahoma Housing Authority consistently accomplishes its Mission by providing decent, safe, and sanitary housing for very low-income families while maintaining their rent payments at an affordable level. We promote fair housing and the opportunity for low and very low-income families of all ethnic backgrounds to live in an environment free from discrimination. We also actively promote economic self-sufficiency by providing numerous services and programs, as detailed in section 12 of this plan.

We are working towards our goal of reducing and maintaining vacancies to less than 2 percent. We are currently in a multi-year renovation program for our two oldest complexes, to improve the energy efficiency and aesthetic appeal of the apartments and make them a more desirable option for leasing. Resident participation has been solid over the past year.

Our Section 8 Voucher payment standards have been increased to Success Level (SR110), which increases opportunity under the Section 8 program. Our utilization is back up to near one hundred percent and we should achieve this goal by year end.

The quality of life and economic vitality of our communities has improved due in large part to both the law enforcement activities, and educational activities provided. Since PHDEP funding has been eliminated, we anticipate a decline and possibly a reversal of this progress. Adopting a local preference for working families has also stimulated economic vitality along with a better mix of incomes within our complexes.

Attachment B

Resident Membership on Governing Board

Name – Brenda Wilson

Method of Selection – Appointed by Mayor

Term of Appointment – Five Years

Attachment C

Membership of Resident Advisory Board

Name	Position	Apartment Complex
Donnie Wilson	President	Cedar Lane Village
Roberta Ross	Vice-President	Whispering Oaks
Sandra McBride	Sec./Treasurer	Cedar Lane Village
Jean McCarver	Representative	Autumn Manor
Brenda Wilson*	Representative	Cedar Lane Village
Margaret White	Representative	Carver Homes
Sabrina Bluth	Representative	Dossett Homes
Lydia Dodson	Representative	Carver Homes

***Resident Commissioner**

Attachment D

Voluntary Conversion of Public Housing Developments
Required Initial Assessment

HOUSING AUTHORITY OF: ***TULLAHOMA, TENNESSEE – TN024***

As required by 24 CFR part 972 – Conversion of Public Housing to Tenant-Based Assistance, we have:

1. *Reviewed each development's operation as public housing;*
2. *Considered the implications of converting the public housing to tenant-based assistance; and*
3. *Concluded that the conversion of the development may be:*
   - *Appropriate because removal of the development would meet the necessary conditions for voluntary conversion; or*
   - *Inappropriate because removal of the development would not meet the necessary conditions for voluntary conversion.*

Necessary conditions for voluntary conversion:
• Not be more expensive than continuing to operate the development (or portion of it) as public housing; • Principally benefit the residents of the public housing development to be converted and the community; and • Not adversely affect the availability of affordable housing in the community.

DEVELOPMENT NUMBER	*DEVELOPMENT NAME*	*DEVELOPMENT EXEMPTED?*	*EXEMPTION REASON*	*CONVERSION APPROPRIATE?*
TN024 – 01	*DOSSETT HOMES*	*NO*	*N/A*	*NO*
TN024 – 02	*CARVER HOMES*	*NO*	*N/A*	*NO*
TN024 – 04	*AUTUMN MANOR*	*YES*	*ELDERLY/DISABLED HIGH RISE*	*N/A*
TN024 – 05	*CEDAR LANE VILLAGE*	*NO*	*N/A*	*NO*
TN024 – 06	*WHISPERING OAKS*	*NO*	*N/A*	*NO*

Voluntary Conversion of Public Housing Developments
Required Initial Assessment

HOUSING AUTHORITY OF: ***TULLAHOMA, TENNESSEE – TN024***

NARRATIVE

During August of 2001 we conducted our initial assessment of housing stock to determine if voluntary conversion to tenant-based assistance would be warranted in any of our developments. In conducting this assessment we looked at cost, ability to occupy the development, cost and workability of vouchers, and other factors.

Our examination of cost factors revealed that our average monthly subsidy expenditure in support of Public Housing was $116.14. Our average monthly HAP expenditure in support of our Section 8 Voucher program was $223.25. This makes a Section 8 Voucher in our area almost twice the cost of Public Housing.

We also examined the impact this action would have on the availability of affordable housing in our community, and the benefit to our residents and applicants for housing. This examination revealed that at the time of the assessment, there were 125 applicants on the Public Housing waiting list, and over 200 applicants waiting for a Section 8 Voucher. The main problems with Section 8 Vouchers in this area is finding landlords that are willing to deal with the regulatory restrictions of the Section 8 program, and also willing to keep their rent within authorized ranges.

In conclusion, our initial assessment resulted in the determination for all our developments, that conversion would be inappropriate. Removal of any of our Public Housing Developments would not meet the necessary conditions for voluntary conversion.

Attachment E

PET POLICY

FOR

TULLAHOMA HOUSING AUTHORITY

(JULY 1999)

All residents who have a pet must sign and abide by the following rules and policies relating to pet ownership on Tullahoma Housing Authority premises. Violation of any one or more of these rules and/or policies will result in revocation of the resident's permission to have a pet. Repeated violations will result in termination of your lease with the Tullahoma Housing Authority.

PET RULES:

1. Permitted pets are domesticated dogs, cats and birds.

2. Maximum number of pets per household: **ONE (1)**

3. Maximum adult size: DOG - 15" tall when full-grown
   CAT - 10" tall when full-grown

4. Dogs and cats are to be licensed each year with the City and residents must show proof of yearly distemper and rabies boosters at initial registration and at the annual recertification. No vicious or intimidating animals will be tolerated.

5. Dogs and cats must remain in the resident's unit unless they are on a leash and directly controlled by an adult. Birds must be confined to a cage at all times.

6. Residents must provide a plastic lined litter box for cat waste. The litter box must be changed on a regular basis. Residents are responsible for properly disposing of cat waste.

7. Residents are responsible for promptly cleaning up pet droppings on Housing Authority property and properly disposing of said droppings.

8. Should the pet accidentally excrete in the apartment, hallway or on public area carpets, floors, etc., it shall be pet owner's immediate responsibility to remove the excretion and sanitize the area. Should the manager or any other employee for any reason be required to remove the excretion or sanitize the area, the pet owner shall be billed for services rendered.

Residents shall take adequate precautions to eliminate any pet odors within or around their unit and maintain the unit in a sanitary condition at all times.

9. Residents shall not permit any disturbances by their pet which would interfere with the other residents peaceful enjoyment of their apartments, whether by loud barking, howling, biting, scratching, chirping or other such activities.

10. Under no circumstances shall pets be left unattended for twenty-four hours or more. If this does happen, the Housing Authority has the right to remove the pet and transfer it to the proper authorities. The Housing Authority accepts no responsibility for the pet under such circumstances.

11. Residents shall not alter their unit, yard, patio or balcony to create an enclosure for any animal.

12. Residents are responsible for all damages, including cost of fumigation caused by their pets.

13. Management may require more frequent housekeeping inspections for residents with pets than for residents without pets.

14. Pets must be housebroken and/or litter trained.

15. No animal of any kind shall be raised, bred or kept in any unit for any commercial purpose.

16. Pets must be on a leash when they are in common areas of the buildings.

17. Cat litter and animal droppings may not be put down the trash chute, but must be disposed of outside in designated containers. (Autumn Manor residents).

18. Residents with pets must provide the Housing Authority office with the name of the pet's veterinarian and an alternate care person to contact in case the resident becomes sick or becomes unable to take care of the animal.

19. If the pet should die, the resident must dispose of the remains according to local health regulations.

20. If, at any time, the pet's condition poses an emergency safety or health hazard, the Housing Authority will have the pet removed at the pet owner's expense.

21. The resident shall be solely responsible for any and all damages or losses occasioned to any person or property by the pet. The resident agrees to hold harmless the Tullahoma Housing Authority and its agents from any and all liability occasioned by the pet.

22. Pets must be restrained whenever maintenance personnel or Housing Staff are in the unit. Should your pet bite a maintenance person or a Housing Staff person, the pet must be immediately removed from the property and pet privileges will be revoked.

23. Complaints from other residents will be handled on a case by case basis. If several complaints are filed against one animal, the animal must be removed from the property.

24. A non-refundable pet fee of $100.00 will be required for owners of dogs or cats. This fee must be paid in full prior to the pet being brought on Tullahoma Housing Authority property.

The privilege of maintaining a pet in the Housing Authority shall be subject to the rules set forth above. This privilege may be revoked at any time subject to the Grievance Procedure.

I HAVE READ AND UNDERSTAND THE ABOVE POLICY PROVISIONS REGARDING THE KEEPING OF PETS AND AGREE TO ABIDE BY THESE PROVISIONS.

Resident's Signature	Date
Spouse/Other Adult Signature	Date
Management's Signature	Date

form **HUD 50075** (03/2006)

Attachment F

COMMUNITY SERVICE POLICY

For

Tullahoma Housing Authority

August 2000

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Introduction

Community Service is defined as the performance of voluntary work or duties that are a public benefit, and that serve to improve the quality of life, enhance resident self-sufficiency, or increase resident self-responsibility in the community. Community Service is not employment and may not include political activities. Additionally, residents may not perform activities that relate to work which is ordinarily performed by Tullahoma Housing Authority employees in order to satisfy this requirement.

The Quality Housing and Work Responsibility Act of 1998 requires that nonexempt residents of public housing perform community service. HUD states that the provision is not intended to be perceived as punitive, but rather considered as rewarding activity that will assist residents in improving their own and their neighbors' economic and social well-being and give residents a greater stake in their communities.

Effective October 01, 2000, in order to be eligible for continued occupancy in public housing, each adult family member must either contribute eight hours per month of community service, or participate in an economic self-sufficiency program. A combination of community service and a self-sufficiency program will suffice to meet this eight hour requirement. The only exception will be those who meet the exemption requirements which are defined in the body of this policy.

Section One

Qualifying Activities

The following list contains community service and self-sufficiency locations and activities that meet the requirements of this policy. This list is not meant to be all inclusive and other programs may be added, as they are identified. If not included on this list, residents must contact the THA office to ensure their activity complies with this policy. Qualifying activities are as follows:

(1) Resident Organizations
(2) Neighborhood Patrols
(3) Participation in Adult Education Programs
(4) Summer Food Program (THA or City of Tullahoma)
(5) Youth Activities (sponsored through the THA community centers)
(6) Youth Activities (sponsored through the City of Tullahoma)
(7) Participation in any approved job training program (JTPA or other State Program)
(8) Correction Academy
(9) Good Samaritan
(10) Haven of Hope
(11) Attic Outlet
(12) Shepherds House
(13) Senior Citizen Center (meals on wheels)
(14) Adult Learning Center
(15) Participation in Community Action Councils or Committees (Drug Task Force)
(16) Participation in AA or other substance abuse programs

Residents will be required to bring in verification of eight hours completed for each month in which they do not qualify for an exemption. The administrator of the program in which the service is being performed must sign this verification of hours worked. The Housing Authority will maintain a time sheet on each Resident that is required to do community service, and will track the hours completed. Residents may complete more than eight hours in one month toward the total of 96 hours per year, therefore completing the requirement earlier than the twelve months allowed. THA will review family compliance on a continuous basis, and will verify such compliance annually, at least thirty days before the end of the twelve month lease term

Any non-exempt Resident who does not complete the required hours in a calendar year, will not be eligible for continued assistance from the Housing Authority, and their lease may be terminated. Residents who have completed their required hours shall have their lease automatically renewed, unless terminated for other good cause. Requirements for exemption are contained in Section Two of this policy.

Section Two

Exemptions

In order to qualify for an exemption from the Community Service requirement, each adult family member must complete an exemption request, along with proper verification, and return this request to the THA office. THA will approve or deny the request for exemption within 30 days from receipt of a request that includes the required documentation. A family member may request exempt status at any time. All new residents are exempt for the partial month when they first move in, after which an exemption must be requested if one is desired.

Exempt individuals are those who meet one or more of the following criteria, and can provide verification:

(1) Is 62 years of age or older;
Verification: Birth Certificate

(2) Is a blind or disabled individual, as defined under the Social Security Act, and who certifies that because of this disability he or she is unable to comply with the community service requirements;
Verification: Social Security or SSI award letter

(3) Can provide documentation from a licensed physician that they have a disabling condition, which would prevent them from completing the community service requirement, specifying the expected length of the disabling condition;
Verification: Letter from physician

(4) Is a family member who is the primary caregiver for someone who is blind or disabled as set forth above;
Verification: Award letter of affected member

(5) Is a family member who is employed, either full or part-time;
Verification: Check Stubs or Income Verification Form

(6) Is a full-time student; (in high school or college with 12 credit hours or more)
Verification: Enrollment Form

(7) Is a family member who is exempt from work activity under Part A of Title IV of the Social Security Act or under any other State welfare program;
Verification: Letter or Notice from DHS

(8) Is a family member receiving assistance, benefits or services under a State program funded under Part A of Title IV of the Social Security Act or under any other State welfare program, and who is in compliance with that program;
Verification: Families First PRP or benefit letter

(9) Is a single parent of under school age children, or a parent of under school age children, where the other adult member qualifies for an exemption from the community service requirement.
Verification: Children's birth certificates

Section Three

Non-Compliance

THA shall not renew or extend any lease, or provide any new lease, for a dwelling unit for any household that includes an adult member who was subject to the community service requirement and failed to comply with the requirement. If THA determines that there is a family member who is required to fulfill the service requirement, but who has violated this family obligation, the resident will be considered to be in non-compliance, and notified of this determination in writing. This notification will contain the following:

A. A brief description of the non-compliance;

B. Notification that THA will not renew the lease at the end of the twelve month lease term unless;

1. The resident, and any other non-compliant family member enter into a written agreement with THA in order to cure such non-compliance. Non-compliance must be cured in accordance with such agreement by participating in an economic self-sufficiency program for or contributing to community service as many additional hours as the resident needs to comply in the aggregate with such requirement and make themselves current with program requirements; or
2. The family provides written assurance satisfactory to the THA that the resident or other non-compliant family member no longer resides in the unit.

A. Notification that the resident may request a grievance hearing on the THA determination in accordance with THA grievance procedures. Additionally, that the resident may exercise any available judicial remedy to seek timely redress for THA's non-renewal of the lease because of such determination.

Section Four

Documentation

On the following pages are the forms used to document participation in Community Service and/or economic self-sufficiency activities. These forms include 1.) A Resident notification letter; 2.) An exemption request form; 3.) A Master time sheet; and 4.) An individual time sheet.

COMMUNITY SERVICE WORK REQUIREMENT NOTIFICATION LETTER

The Quality Housing and Work Responsibility Act of 1998 requires that nonexempt residents of public housing perform community service. In order to be eligible for continued occupancy, each adult family member must contribute eight hours of community service per month or participate in an economic self-sufficiency program, or a combination of the two for eight hours per month, unless they are exempt from the requirement.

Eligible activities for completion of your Community Service Requirement will include eight hours per month contributed to any of the following activities or organizations:

(1) Resident Organizations
(2) Neighborhood Patrols
(3) Participation in Adult Education Programs
(4) Summer Food Program (THA or City of Tullahoma)
(5) Youth Activities (sponsored through the THA community centers)
(6) Youth Activities (sponsored through the City of Tullahoma)
(7) Participation in any approved job training program (JTPA or other State Program)
(8) Correction Academy
(9) Good Samaritan
(10) Haven of Hope
(11) Attic Outlet
(12) Shepherds House
(13) Senior Citizen Center (meals on wheels)
(14) Adult Learning Center
(15) Participation in Community Action Councils or Committees (Drug Task Force)
(16) Participation in AA or other substance abuse programs

If you are participating in a program that is not listed, contact the Housing Authority office with the name of the program in which you are participating. This list is not meant to be all inclusive and other programs may be added, as we become aware of them.

You will be required to bring in verification of hours completed each month. The administrator of the program in which you are participating must sign your verification of hours worked. The Housing Authority will maintain a time sheet on each Resident that is required to do community service, and will track the hours completed. You may complete more than eight hours in one month toward your total of 96 hours per year, therefore completing your requirement earlier than the twelve months allowed. You must only have eight hours for each month in which you do not qualify for an exemption. Exemption request forms are available at the Housing Authority business office.

Anyone who does not complete the required hours in a calendar year, will not be eligible for continued assistance from the Housing Authority, and their lease may be terminated. Residents who have completed their required hours shall have their lease automatically renewed, unless terminated for other good cause.

Sincerely,

form **HUD 50075** (03/2006)

<u>COMMUNITY SERVICE</u>
EXEMPTION REQUEST

All adult (over 18) members of resident families are required to perform eight hours of community service each month, unless they qualify for exempt status with the Housing Authority. To qualify for an exemption, each adult family member must complete and return an exemption request, along with proper documentation, to verify that they are exempt from the community service requirement.

Exempt individuals are those who meet one or more of the following criteria. An adult who:

(1) Is 62 years of age or older;
Verification: Birth Certificate

(2) Is a blind or disabled individual, as defined under the Social Security Act, and who certifies that because of this disability he or she is unable to comply with the community service requirements;
Verification: Social Security or SSI award letter

(3) Can provide documentation from a licensed physician that they have a disabling condition, which would prevent them from completing the community service requirement, specifying the expected length of the disabling condition;
Verification: Letter from physician

(4) Is a family member who is the primary caregiver for someone who is blind or disabled as set forth above;
Verification: Award letter of affected member

(5) Is a family member who is employed, either full or part-time;
Verification: Check Stubs or Income Verification Form

(6) Is a full-time student; (in high school or college with 12 credit hours or more)
Verification: Enrollment Form

(7) Is a family member who is exempt from work activity under Part A of Title IV of the Social Security Act or under any other State welfare program;
Verification: Letter or Notice from DHS

(8) Is a family member receiving assistance, benefits or services under a State program funded under Part A of Title IV of the Social Security Act or under any other State welfare program, and who is in compliance with that program;
Verification: Families First PRP or benefit letter

(9) Is a single parent of under school age children, or a parent of under school age children, where the other adult member qualifies for an exemption from the community service requirement.
Verification: Children's birth certificates

In order to qualify for the exemption, you must turn in verification of your exemption with your request form. All new residents are exempt for the partial month when they first move in, after which an exemption must be requested if one is desired. If an exemption is not requested, it will be assumed that you do not desire one and you will be required to perform the required community service hours. Please fill in required information below.

I do hereby request an exemption from performing my eight hours of community service each month, because I qualify for one of the exemptions listed above.

_____	_____	_____
NAME	ADDRESS	DATE

form **HUD 50075** (03/2006)

COMMUNITY SERVICE
MASTER TIME SHEET

HOUSING COMMUNITY _____

	HOURS COMPLETED												
NAME & APT#	**J**	**F**	**M**	**A**	**M**	**J**	**J**	**A**	**S**	**O**	**N**	**D**	**TOT**

1-96 HOURS COMPLETED

X EXCUSED (NEW MOVE-IN, ETC.)

E EXEMPT (TEMP. EXEMPTION)

Figures are taken monthly from individual time sheets and posted to the master time sheet. Individual time sheets are arranged by Housing Community in this book
Individual time sheets are placed in tenant files once annual hours are completed.

form **HUD 50075** (03/2006)

COMMUNITY SERVICE
INDIVIDUAL TIME SHEET

NAME _____ **MOVE-IN DATE**_____

ADDRESS_____START MONTH_____

MONTH	HOURS REQ	HOURS COMP	ORGANIZATION	LOCATION	VERIFIED
JANUARY					
FEBRUARY					
MARCH					
APRIL					
MAY					
JUNE					
JULY					
AUGUST					
SEPTEMBER					
OCTOBER					
NOVEMBER					
DECEMBER					
TOTAL					

ANNUAL REQUIREMENT COMPLETED Y N

CERTIFIED BY _____

form **HUD 50075** (03/2006)

Attachment G

Follow-up Plan for Resident Survey

Communication

We have made changes in several areas in order to address this issue. We have expanded our Resident newsletter, and distribute copies at the main office during rent week as well as distributing copies door-to-door to those residents who are housebound or pay by mail. We have implemented a "Welcome to THA" program for all new residents that incorporates a gift bag with pertinent information regarding services offered. Flyers for all Resident Services events are distributed door-to-door before the event. We have increased the community presence of staff members, especially Resident Services personnel so that all our residents are aware of the many services and activities THA makes available. We continue to use a VISTA member in the Resident Services Department to help in these efforts. As in the past, all staff members are available to the residents five days per week.

Neighborhood Appearance

The majority of negative feedback on this survey section came from residents of TN024-001. This development was undergoing major exterior building renovations at the time the survey was administered. Admittedly this has been inconvenient for our residents, but the results have been worth it. This is a multi-year Capital fund project, so we expect this to be an ongoing issue. THA is proud of its neighborhoods, and has an ongoing program of neighborhood improvements and clean-up. In addition to residents efforts to keep the units clear of trash as required in the lease, the THA provides maintenance staff to pick up trash on a daily basis. THA continues to plant grass, trees and flowers during the spring and summer seasons. In addition, trees and shrubs are regularly trimmed. THA works closely with the resident council and resident organizations in an effort to make necessary aesthetic improvements. We all want our developments to be clean and attractive.

Safety

The Resident Services Department of Tullahoma Housing Authority has continued, in conjunction with the local Fire and Police Departments, to develop a comprehensive risk management plan with an emphasis on fire safety and drug awareness. Additionally, Tullahoma Housing Authority pays the salary of one full-time Tullahoma Police Officer who is under the operational control of the Housing Authority and works full time on crime and safety issues within Housing Authority properties. Our officer visits all of our sites during his normal rounds and visits with and offers assistance to all of our residents. Our Maintenance Staff is required to conduct a safety check in each unit when they do annual Preventative Maintenance inspections They check for frayed carpet or loose area rugs, make sure there is nothing around heaters and

check for fall hazards within the apartment. They will update data for the fire department on residents who are wheelchair bound, need assistance, have oxygen in use or are hearing impaired. In our summer youth program we have implemented fire safety classes for the children and have police officers who speak to the children on relevant issues.

Attachment H

DECONCENTRATION POLICY

Adopted September 16, 1999

Objective

The objective of the Deconcentration Policy for the Tullahoma Housing Authority (THA) is to achieve the goal that families are housed in a manner that will prevent a concentration of poverty families and/or a concentration of higher income families in any one development or census tract. The THA will take actions as necessary to achieve the goal that no individual development has a concentration of higher income or lower income families. To ensure that the THA does not concentrate families with higher or lower income levels in any one development, the THA will track the status of family income, by development, on a monthly basis utilizing income reports generated by the THA's computer system.

Actions

To accomplish the deconcentration goals, the THA will take the following actions:

At the beginning of each fiscal year the THA will establish a numerical goal for admission of families whose incomes are at or below 30 percent of the area median income. The target annual goal will be calculated by taking 40 percent of the total number of move-ins from the previous THA fiscal year.

The THA will limit the number of admissions to ensure that not less than 40 percent of admissions are families with incomes at or below 30 percent of the area median income.

The THA will skip families on the waiting list or skip developments to accomplish these goals. The THA will not hold units vacant to accomplish these goals.

Attachment I

VIOLENCE AGAINST WOMEN ACT POLICY

For the

TULLAHOMA HOUSING AUTHORITY

Adopted: 12/20/2007

VIOLENCE AGAINST WOMEN ACT POLICY

BACKGROUND

The Violence Against Women and Justice Department Reauthorization Act of 2005 (VAWA) provides protection for 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 such acts of violence against them.

In general, the law provides, in part, that criminal activity directly relating to domestic violence, dating violence or stalking, engaged in by a member of a tenant's household, or any guest or other persons under the tenant's control, shall not be cause for termination of assistance, tenancy or occupancy rights of the tenant or immediate family member of the tenant's family is the victim or threatened victim of the abuse. The law provides that an incident or incidents of actual or threatened domestic violence, dating violence or stalking will not be construed as serious or repeated violations of the lease by the victim or threatened victim of that violence, and will not be "good cause" for termination of assistance, tenancy, or occupancy rights of a victim of such violence.

Furthermore, the law allows a PHA to "bifurcate" a lease, or remove a household member from a lease, without regard to whether a household member is a signatory to the lease, in order to evict, remove, terminate occupancy rights, or terminate assistance to any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others, without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is also a tenant or lawful occupant.

The VAWA also allows PHAs to request an individual to certify that the individual is a victim of abuse and that the incidences of abuse are bona fide. The certification must include the name of the perpetrator, and any other statutorily required information. The victim must provide the certification within 14 business days after the individual receives a request for such a certification from the PHA.

DEFINITIONS

The following definitions were incorporated into the United States Housing Act and apply to this policy:

Domestic Violence: Includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim share a child in common, by a person who is cohabitating with, or has cohabited with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Dating Violence: Violence 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: 1) the length of the relationship; 2) the type of relationship, and 3) the frequency of interaction between the persons involved in the relationship.

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 another person; 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

the death of, or serious bodily injury to, or to cause substantial emotional harm to 1) that person; 2) a member of the immediate family of that person, or 3) the spouse or intimate partner of that person.

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.

POLICY

The following policy amends the *Admissions and Occupancy Policy (ACOP)* and the Apartment Lease by reference. Appropriate language will be added to the ACOP and Apartment lease at the next revision dates of each.

A copy of this policy is available at the main office of the housing authority. A copy will be made available on request.

Admissions and Occupancy and Termination of Assistance

Being a victim of domestic violence, dating violence, or stalking, will not be considered by the Tullahoma Housing Authority to be a basis for denial of assistance, or admission to public housing if the application otherwise qualifies for assistance or admission.

Incidents or threats of abuse will not be construed by the Tullahoma HA as serious or repeated violations of the lease or other "good cause" for termination of the assistance, tenancy, or occupancy rights of a victim of abuse.

Criminal activity directly relating to abuse, engaged in by a member of a tenant's household or any guest or other person under the tenant's control, shall not be cause for termination of assistance, tenancy or occupancy rights if the tenant or an immediate family member of the tenant's family is the victim or threatened victim of the abuse.

Rights of the Tullahoma Housing Authority

The Tullahoma HA may bifurcate a lease, or remove a household member from a lease, without regard to whether a household member is a signatory to the lease, in order to evict, remove, terminate occupancy rights or terminate assistance to any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others, without evicting, removing, terminating assistance to, or otherwise penalizing the victim of such violence who is also a tenant or lawful occupant, and such eviction, removal, termination of occupancy rights, or termination of assistance shall be effected in accordance with the procedures prescribed by federal, state and local law for the termination of leases, or assistance under HUD's Public Housing Program.

Certification of Abuse and Confidentiality

The Tullahoma HA will require that an individual certify that he/she is a victim of abuse and that the incidences of abuse are bonafide. The certification must include the name of the perpetrator, and any other statutorily required information. The victim must provide the certification to the PHA within 14 business days after the individual receives a request from the PHA. The individual may utilize the attached *Form HUD 50066, Certification of Domestic Violence, Dating Violence, or Stalking* to certify the abuse to the Tullahoma HA. In lieu of Form HUD 50066, the individual may provide the Tullahoma HA with documentation signed by an employee, agent, volunteer of a victim service provider, an attorney, or a medical profession from whom the victim has sought assistance in addressing domestic violence, dating violence, or stalking, or the affects of the abuse, in which the professional attests (under penalty or perjury (28 U.S.C. 1746) to the professionals believe that the incident or incidents in question are bonafide incidents of abuse, and the victim of domestic violence, dating violence, or stalking has signed or attested to the documentation. In cases where the individual does not submit the required certification, the PHA may terminate assistance.

Notification to Residents

The PHA will provide notice to all residents and applicants of their rights under Section 6 of the United States Housing Act of 1937 as amended by the Violence Against Women Act of 2005. These rights include the residents' right to confidentiality and the limits thereof, the availability of Form HUD 50066, and that the resident may not be evicted solely on the basis that they are a victim of domestic violence. A sample notice is included with this policy.

Confidentiality

All information provided to the Tullahoma HA relating to the incident(s) of domestic violence, including the fact that the individual is a victim of domestic violence, dating violence, or stalking will be retained in confidence by the Tullahoma HA and will not be entered into any shared database nor provided to a related entity, except to the extent that the disclosure is (a) requested or consented by the individual in writing; (b) required for use in an eviction proceeding or termination of assistance; or, (c) otherwise required by applicable law.

NOTICE TO RESIDENTS AND APPLICANTS REGARDING RIGHTS UNDER THE VIOLENCE AGAINST WOMEN ACT

The Violence Against Women Act of 2005 (VAWA) protects victims of domestic violence, dating violence and stalking. These changes affect all persons assisted under the Public Housing and Section 8 Program.

Individuals may not be denied housing assistance, terminated from Public Housing or evicted for being the victim of domestic violence, dating violence or stalking. However, the VAWA provides certain limitations and clarifications concerning your rights. In particular, you should know that nothing contained in VAWA:

1. Prevents the Housing Authority 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 provides protections as described above. However, the Tullahoma HA may not in such cases apply any stricter standard to you than to other tenants.

2. Prevents the PHA 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 Tullahoma HA, you will not be protected from eviction by VAWA.

3. Limits the ability of the Tullahoma HA 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.

VAWA also creates a new authority under federal law that allows a housing authority 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.

If you believe that you qualify for protection under VAWA, please notify the PHA. You will be asked to provide proof of your situation by filling out Form HUD 50066 and/or providing a copy of an order of protection, police or court report or a signed document from a victim service provider, medical provider or attorney who has provided a service related to the violence. You must submit this information within 14 business days of the PHA's request for it. Protections may not apply if the documentation is provided after 14 days. Form HUD 50066 will be provided at the office.
Tullahoma Housing Authority will make every effort to correspond with victims in a way that will not put them at greater risk. The Tullahoma HA may request that applicants or residents requesting VAWA protection come to the office to submit information. All information will be kept confidential by the Tullahoma Housing Authority and will not be shared or disclosed by the Housing Authority without your consent except as noted in the Confidentiality clause of the VAWA Policy.

You may obtain a copy of the PHA's written policy concerning domestic violence, dating violence, and stalking from the HA's main office. Please note that the written policy contains, among other things, definitions of the terms "domestic violence", "dating violence", "stalking", and "immediate family".

Other resources that may be of assistance include the National Domestic Violence Hotline (1-800-799-SAFE), and the National Domestic Violence Hotline website http://www.ndvh.org.

form **HUD 50075** (03/2006)

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.

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:

Description of Incident:

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

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.

form **HUD 50075** (03/2006)

Attachment J

LIMITED ENGLISH PROFICIENCY POLICY

For the

TULLAHOMA HOUSING AUTHORITY

Adopted: 12/20/2007

LIMITED ENGLISH PROFICIENCY POLICY

BACKGROUND

On January 22, 2007, HUD published proposed Guidance to help recipients of federal financial assistance take reasonable steps to meet their regulatory and statutory obligations to ensure that Limited English Proficiency (LEP) persons have meaningful access to HUD programs and activities.

Under Title VI of the Civil Rights Act of 1964 (Title VI) and its implementing regulations, recipients of federal financial assistance have a responsibility to ensure meaningful access to programs and activities by LEP persons.

LIMITED ENGLISH PROFICIENT INDIVIDUALS

Persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English can be limited English proficient, or "LEP", and may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.

DETERMINING THE EXTENT OF OBLIGATION TO PROVIDE LEP SERVICES

The PHA will take reasonable steps to ensure meaningful access to its programs and activities by LEP persons.

The PHA will apply the following four factors to the various kinds of contacts that they have with the public to assess language needs and decide what reasonable steps they could take to ensure meaningful access for LEP persons.

The Number or Proportion of LEP Persons Served or Encountered in the Eligible Service Area

The PHA will identify the number or proportion of LEP persons from a particular language group served or encountered in the eligible service population. Ordinarily, persons "eligible to be served", or "likely to be directly affected by" the PHA's programs or activities are those who are served or encountered in the eligible service population. This population is program-specific, and includes persons who are in the geographic area that has been approved by HUD or defined by other law or regulation as the recipient's jurisdiction or service area.

The PHA will first examine its prior experiences with LEP encounters and determine the breadth and scope of language services that were needed. In conducting this analysis, the PHA will consider language minority populations that are eligible for their programs or activities, but may be underserved because of existing language barriers. Other data that may be consulted to refine or validate the PHA's prior experience, including the latest census data for the area served, data from school systems and from community organizations, and data from state and local governments. The focus of the analysis will be on the lack of English proficiency, not the ability to speak more than one language.

Community agencies, school systems, grassroots and faith-based organizations, legal aid entities, and others may be contacted to assist in identifying populations for whom outreach is needed and who would benefit from the PHA's programs and activities if language services were provided.

The Frequency with Which LEP Individuals Come in Contact With the PHA's Programs.

The PHA will assess, as accurately as possible, the frequency with which they have or should have contact with an LEP individual from different language groups seeking assistance. The more frequent the contact with a particular language group, the more likely the need for enhanced language services in that language. In conducting this review the PHA will consider whether appropriate outreach to LEP persons could increase the frequency of contact with LEP language groups.

The Nature and Importance of the Program, Activity, or Service Provided by the Program

The PHA will attempt to determine whether denial or delay of access to services or information could have serious or even life-threatening implications for the LEP individual. In determining the nature and importance of its program(s), the PHA will consider such factors as decisions by HUD, another federal, state, or local entity, or the PHA to make a specific activity compulsory in order to participate in the program, such as filling out particular forms, participating in administrative hearings, or other activities.

The Resources Available to the Recipient and Costs

The PHA will explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns. If determined appropriate, the PHA will document in some reasonable manner, its process for determining that language services will be limited based on resources or costs.

SELECTING LANGUAGE ASSISTANCE SERVICES

If determined necessary, the PHA will provide language services in either oral or written form.

Oral Language Services (Interpretation)

Where the PHA determines that interpretation is needed and is a reasonable service to provide, the PHA will consider some or all of the following options for providing competent interpreters in a timely manner:

Competence of Interpreters

When using interpreters, the PHA will attempt to ensure that they:

1. Demonstrate proficiency in and ability to communicate information accurately in both English and in the target language and identify and employ the appropriate mode of interpreting (e.g., consecutive, simultaneous, summarization, or sight translation);
2. Have knowledge in both languages of any specialized terms or concepts peculiar to the PHA's programs or activities and of any particularized vocabulary and phraseology used by the LEP person; and
3. Understand and follow confidentiality and impartiality rules to the same extent the PHA employee for whom they are interpreting and/or to the extent their position requires, and understand and adhere to their role as interpreters without deviating into a role as counselor, legal advisor, or other roles (particularly in court, administrative hearings, or law enforcement contexts).

Hiring Bilingual Staff

If particular languages are encountered often, the PHA will consider hiring bilingual staff to fill public contact positions, such as persons who take applications with staff who are bilingual and are competent with communicating directly with LEP persons in the LEP persons' own language.

Hiring Staff Interpreters

Hiring interpreters may be considered where there is a frequent need for interpreting services in one or more languages. Depending on the facts, it may be determined necessary to provide on-site interpreters to provide accurate and meaningful communication with an LEP person.

Contracting for Interpreters

Contract interpreters may be considered when there is no regular need for a particular language skill. If appropriate, the PHA may seek these services from community-based organizations or other mutual assistance associations.

Using Telephone Interpreter Line

If determined appropriate and available telephone interpreter service lines will be considered.

Using Community Volunteers

If determined appropriate and available, the PHA will consider community volunteers and working with community-based organizations to provide supplemental language assistance. They may be particularly useful in providing language access for the PHA's less critical programs and activities.

Use of Family Members or Friends as Interpreters

Where LEP persons so desire, they will be permitted to use, at their own expense, an interpreter of their own choosing (whether a professional interpreter, family member, or friend) in place of, or as a supplement to, the free language services that may be offered by the PHA.

Written Language Services (Translation)

Where the PHA determines that interpretation is needed and is a reasonable service to provide, the appropriate documents will be translated into the appropriate target language(s).

What Documents will be Translated?

After applying the four-factor analysis, the PHA may determine that an effective Language Assistance Plan (LAP)for its particular program or activity may include the translation of vital, or generic widely used written materials into the language of each frequently encountered LEP group eligible to be served and/or likely to be affected by the recipient's program. Such written materials may include, for example:

1. Consent and complaint forms;
2. Intake forms with the potential for important consequences;
3. Written notices of rights, denial, loss, or decreases in benefits or services, and other hearings;
4. Notices of eviction;
5. Notices advising LEP persons of free language assistance;
6. Notices of resident meetings and public hearings;
7. Leases and tenant rules; and/or
8. Applications to participate in a recipient's program or activity or to receive recipient benefits or services.

Into What Languages will Documents be Translated?

The extent of the PHA's obligation to provide written translations of documents will be determined by the PHA on a case-by-case basis, looking at the totality of the circumstances
in light of the four-factor analysis.

Minimum Standards

The following will serve as a guide in the PHA's decision to provide document translation for a specific target language:

1. The PHA will generally provide written translations of vital documents for each eligible LEP language group that constitutes 5 percent or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, will be provided orally; or
2. If there are fewer than 50 persons in a language group that reaches the 5 percent trigger in (a)above, the PHA will not translate vital written materials but instead will provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

Competence of Translators

The PHA will make reasonable efforts to ensure that translators of written documents are competent. Where available, the PHA will utilize the services of certified translators.

ELEMENTS OF THE LANGUAGE ASSISTANCE PLAN

After completing the four-factor analysis and deciding what language assistance services are appropriate, the PHA will, develop an implementation plan to address the identified needs of the LEP populations it serves. The following five components will be included in the Language Assistance Plan:

Identifying LEP Individuals Who Need Language Assistance

One of the ways the PHA may use to determine the language of communication is to use language identification cards (or "I speak cards"), which invite LEP persons to identify their language needs to staff. The Census Bureau "I speak card" can be found and downloaded at http://www.usdoj.gov/crt/cor/13166.htm
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The PHA may review demographic data for its jurisdiction from the most recent U.S. Census or update, where available, to determine if it is necessary to provide written translations based on the criteria established under Section IV, B, 3, Standards above. This information can be obtained from: http://factfinder.census.gov/home/saff/main.html?_lang=en

Also, If records are available of past interactions with members of the public, the language of the LEP person(s) will be included as part of the record.

In addition, the PHA may post notices in commonly encountered languages notifying LEP persons of language assistance which will encourage them to self-identify.

Language Assistance Measures

The Language Assistance Plan will include information about the ways in which language assistance will be provided. For instance, the PHA may include information on the following:

1. Types of language services available;
2. How staff can obtain those services;
3. How to respond to LEP callers;
4. How to respond to written communications from LEP persons;
5. How to respond to LEP persons who have in-person contact with recipient staff; and
6. How to ensure competency of interpreters and translation services.

Training Staff

If appropriate, the LAP may include training to ensure that:

1. Staff knows about LEP policies and procedures; and
2. Staff having contact with the public is trained to work effectively with in-person and telephone interpreters.

Providing Notice to LEP Persons

Once the PHA has decided, based on the four-factors analysis, that it will provide language services, it will notify LEP persons that those services are available and that they are free of charge. The PHA will provide this notice in a language that LEP persons will understand. Types of notification that the PHA will consider include:

1. Posting signs in common areas, offices, and anywhere applications are taken;
2. Stating in outreach documents that language services are available from the PHA;
3. Working with grassroots and faith-based community organizations and other stakeholders to inform LEP individuals of the PHA's services, including the availability of language assistance services;
4. Using a telephone voice mail menu. The menu would be in the most common languages encountered. It would provide information about available language assistance services and how to get them, including notices in local newspapers in languages other than English;
5. Providing notices on non-English-language radio and television stations about the available language assistance services and how to get them; and,
6. Presentations and/or notices at schools and grassroots and faith-based organizations.

Monitoring and Updating the Language Assistance Plan

Where appropriate, the PHA will develop a process for determining, on an ongoing basis, whether new documents, programs, services, and activities need to be made accessible for LEP persons, and the PHA may provide notice of any changes in services to the LEP public and to employees. In addition, the PHA may consider whether changes in demographics, types of services, or other needs require annual reevaluation of their LAP.
In its reviews, the PHA may consider assessing changes in:

1. Current LEP populations in the housing jurisdiction geographic area or population affected or encountered;
2. Frequency of encounters with LEP language groups;
3. The nature and importance of activities to LEP persons;
4. The availability of resources, including technological advances and sources of additional resources, and the costs imposed;
5. Whether existing assistance is meeting the needs of LEP persons;
6. Whether staff knows and understands the LAP and how to implement it; and

7. Whether identified sources for assistance are still available and viable.

In addition to these elements, the plan will set clear goals, make management accountable, and provide opportunities for community input and planning throughout the process.

Currently a Spanish interpreter is available on staff.