

# PHA 5-Year and Annual Plan

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

OMB No. 2577-0226  
Expires 4/30/2011

1.0	<b>PHA Information</b> PHA Name: <u>Housing Authority – City of Casper</u> PHA Code: <u>WY004</u> PHA Type: <input type="checkbox"/> Small <input type="checkbox"/> High Performing <input checked="" type="checkbox"/> Standard <input type="checkbox"/> HCV (Section 8) PHA Fiscal Year Beginning: (MM/YYYY): <u>04/01/2010</u>																														
2.0	<b>Inventory</b> (based on ACC units at time of FY beginning in 1.0 above) Number of PH units: <u>75</u> Number of HCV units: <u>499</u>																														
3.0	<b>Submission Type</b> <input checked="" type="checkbox"/> 5-Year and Annual Plan <input type="checkbox"/> Annual Plan Only <input type="checkbox"/> 5-Year Plan Only																														
4.0	<b>PHA Consortia</b> <input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below.)																														
	<table border="1"> <thead> <tr> <th rowspan="2">Participating PHAs</th> <th rowspan="2">PHA Code</th> <th rowspan="2">Program(s) Included in the Consortia</th> <th rowspan="2">Programs Not in the Consortia</th> <th colspan="2">No. of Units in Each Program</th> </tr> <tr> <th>PH</th> <th>HCV</th> </tr> </thead> <tbody> <tr> <td>PHA 1:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>PHA 2:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>PHA 3:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program		PH	HCV	PHA 1:						PHA 2:						PHA 3:									
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PHA 1:																															
PHA 2:																															
PHA 3:																															
5.0	<b>5-Year Plan.</b> Complete items 5.1 and 5.2 only at 5-Year Plan update.																														
5.1	<b>Mission.</b> 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 for the next five years:  <p style="margin-left: 40px;">The PHA's mission is to provide safe, decent and sanitary housing conditions for low income, very low-income, and extremely low income families and to manage resources efficiently. The PHA is to promote personal, economic and social upward mobility to provide families the opportunity to make the transition from subsidized to non-subsidized housing.</p>																														
5.2	<b>Goals and Objectives.</b> Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. <ol style="list-style-type: none"> <li>1) PHA Goal : Improve the quality of assisted housing             <ol style="list-style-type: none"> <li>A) Improve public housing management to High Performer with a score of 90. For FY2008 (PHAS) Score is 86.</li> <li>B) Continue to be a High Performer with the Housing Choice Voucher program with a score of 90 or above.</li> <li>C) Concentrate on efforts to improve specific management functions: Improve the internal control process for the Housing Authority and improve the financial audit to have no findings.</li> <li>D) Renovate public housing units. All PH units except for one unit has energy efficient windows. The units are aging and needing extensive renovations and updating. During the economic boom that ended in 2009 it was very difficult obtaining contractors to complete work ie fences, landscaping, concrete work and Section 504 modifications that are required. All fences will be repaired or replaced by FY2014, concrete work and Section 504 modifications will be complete by FY2010.</li> </ol> </li> <li>2) PHA Goal: Increase assisted housing choices             <ol style="list-style-type: none"> <li>A) Conduct outreach efforts to potential voucher landlords. For FY2011 through outreach efforts the goal is to increase new landlords to 10.</li> </ol> </li> <li>3) PHA Goal: Provide an improved living environment             <ol style="list-style-type: none"> <li>A) Implement public housing security improvements. For FY2011 install security cameras at properties located at Provence Court and Washington Street.</li> </ol> </li> <li>4) PHA Goal: Ensure equal opportunity and affirmatively further fair housing             <ol style="list-style-type: none"> <li>A) Undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required. This objective is ongoing. We continue to approve Request for Reasonable Accommodations for disabled individuals to improve accessible housing</li> <li>B) Complete the requirements for the Voluntary Compliance Agreement with the Regional Fair Housing office by May 2010.</li> </ol> </li> </ol>																														

6.0	<p><b>PHA Plan Update</b></p> <p>(a) There have been no revisions to the PHA Plan elements in the last fiscal year but listed below is a brief statement describing each PHA Plan element.</p> <p>(b) Copies of the 5-Year and Annual PHA Plan may be obtained at the Housing Authority – City of Casper located at 1514 E. 12<sup>th</sup> St, #105, Casper, WY 82601 (307) 266-1388 ext. 12.</p>
7.0	<p><b>Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers.</b> The Housing Authority of the City of Casper is going to be writing a Homeownership Plan for Public Housing Units during the FYB 4/1/2010. The goal is to start with one family to assist in purchasing a public housing home.</p>
8.0	<p><b>Capital Improvements.</b> Please complete Parts 8.1 through 8.3, as applicable. <b>SEE BELOW</b></p>
8.1	<p><b>Capital Fund Program Annual Statement/Performance and Evaluation Report.</b> As part of the PHA 5-Year and Annual Plan, annually complete and submit the <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i>, form HUD-50075.1, for each current and open CFP grant and CFFP financing. <b>SEE BELOW</b></p>
8.2	<p><b>Capital Fund Program Five-Year Action Plan.</b> As part of the submission of the Annual Plan, PHAs must complete and submit the <i>Capital Fund Program Five-Year Action Plan</i>, form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan. <b>SEE BELOW</b></p>
8.3	<p><b>Capital Fund Financing Program (CFFP).</b> <input type="checkbox"/> Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements.</p>
9.0	<p><b>Housing Needs.</b> Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. <b>SEE BELOW</b></p>
9.1	<p><b>Strategy for Addressing Housing Needs.</b> 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. <b>Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan. SEE BELOW</b></p>
10.0	<p><b>Additional Information.</b> Describe the following, as well as any additional information HUD has requested. <b>SEE BELOW</b></p> <p>(a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA’s progress in meeting the mission and goals described in the 5-Year Plan.</p> <p>(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA’s definition of “significant amendment” and “substantial deviation/modification” <b>The Housing Authority – City of Casper WY defines a Substantial Deviation from the 5-Year Plan and Significant Amendment or Modification to the Annual Plan as the following:</b></p> <ol style="list-style-type: none"> <li>1) Additions of non-emergency work items (items not included in the current Annual Statement or Five-Year Action Plan) or change in the use of replacement reserve funds under the Capital Fund.</li> <li>2) Any change with regard to demolition or disposition, designation, homeownership programs or conversion activities.</li> </ol>

<b>11.0</b>	<p><b>Required Submission for HUD Field Office Review.</b> In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. <b>Note:</b> Faxed copies of these documents will not be accepted by the Field Office.</p> <p>(a) Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i> (which includes all certifications relating to Civil Rights)</p> <p>(b) Form HUD-50070, <i>Certification for a Drug-Free Workplace</i> (PHAs receiving CFP grants only)</p> <p>(c) Form HUD-50071, <i>Certification of Payments to Influence Federal Transactions</i> (PHAs receiving CFP grants only)</p> <p>(d) Form SF-LLL, <i>Disclosure of Lobbying Activities</i> (PHAs receiving CFP grants only)</p> <p>(e) Form SF-LLL-A, <i>Disclosure of Lobbying Activities Continuation Sheet</i> (PHAs receiving CFP grants only)</p> <p>(f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations.</p> <p>(g) Challenged Elements</p> <p>(h) Form HUD-50075.1, <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> (PHAs receiving CFP grants only)</p> <p>(i) Form HUD-50075.2, <i>Capital Fund Program Five-Year Action Plan</i> (PHAs receiving CFP grants only)</p>
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## PHA PLAN UPDATE

Applicable & On Display	Supporting Document	Related Plan Component
X	<i>PHA Certifications of Compliance with the PHA Plans and Related Regulations and Board Resolution to Accompany the Standard Annual, Standard Five-Year, and Streamlined Five-Year/Annual Plans;</i>	5 Year and Annual Plans
X	<i>PHA Certifications of Compliance with the PHA Plans and Related Regulations and Board Resolution to Accompany the Streamlined Annual Plan</i>	Streamlined Annual Plans
X	<i>Certification by State or Local Official of PHA Plan Consistency with Consolidated Plan.</i>	5 Year and standard Annual Plans
X	Fair Housing Documentation Supporting Fair Housing Certifications: 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	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/ACOP), which includes the Tenant Selection and Assignment Plan [TSAP] and the Site-Based Waiting List Procedure.	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Section 8 Administrative Plan	Annual Plan: Eligibility, Selection, and Admissions Policies
X	Public housing rent determination policies, including the method for setting public housing flat rents. <input checked="" type="checkbox"/> Check here if included in the public housing A & O Policy.	Annual Plan: Rent Determination
X	Schedule of flat rents offered at each public housing development. <input checked="" type="checkbox"/> Check here if included in the public housing A & O Policy.	Annual Plan: Rent Determination
X	Section 8 rent determination (payment standard) policies (if included in plan, not necessary as a supporting document) and written analysis of Section 8 payment standard policies. <input checked="" type="checkbox"/> Check here if included in Section 8 Administrative Plan.	Annual Plan: Rent Determination
X	Public housing management and maintenance policy documents, including policies for the prevention or eradication of pest infestation (including cockroach infestation).	Annual Plan: Operations and

Applicable & On Display	Supporting Document	Related Plan Component
		Maintenance
X	Results of latest Public Housing Assessment System (PHAS) Assessment (or other applicable assessment).	Annual Plan: Management and Operations
X	Results of latest Section 8 Management Assessment System (SEMAP)	Annual Plan: Management and Operations
X	Any policies governing any Section 8 special housing types <input checked="" type="checkbox"/> Check here if included in Section 8 Administrative Plan	Annual Plan: Operations and Maintenance
X	Public housing grievance procedures <input checked="" type="checkbox"/> Check here if included in the public housing A & O Policy	Annual Plan: Grievance Procedures
X	Section 8 informal review and hearing procedures. <input checked="" type="checkbox"/> Check here if included in Section 8 Administrative Plan.	Annual Plan: Grievance Procedures
X	The Capital Fund/Comprehensive Grant Program Annual Statement /Performance and Evaluation Report for any active grant year.	Annual Plan: Capital Needs
X	Most recent CIAP Budget/Progress Report (HUD 52825) for any active CIAP grants.	Annual Plan: Capital Needs
X	Self-evaluation, Needs Assessment and Transition Plan required by regulations implementing Section 504 of the Rehabilitation Act and the Americans with Disabilities Act. See PIH Notice 99-52 (HA).	Annual Plan: Capital Needs
X	Public Housing Community Service Policy/Programs <input checked="" type="checkbox"/> Check here if included in Public Housing A & O Policy	Annual Plan: Community Service & Self-Sufficiency
X	Policy on Ownership of Pets in Public Housing Family Developments (as required by regulation at 24 CFR Part 960, Subpart G). <input checked="" type="checkbox"/> Check here if included in the public housing A & O Policy.	Annual Plan: Pet Policy
X	The results of the most recent fiscal year audit of the PHA conducted under the Single Audit Act as implemented by OMB Circular A-133, the results of that audit and the PHA's response to any findings.	Annual Plan: Annual Audit
X	Other supporting documents: Violence Against Women Act	Annual Plan; VAWA

## PHA Plan Elements

### 1. Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures.

#### A. PUBLIC HOUSING

##### (1) ELIGIBILITY

CASPER HOUSING AUTHORITY(CHAV)VERIFIES ELIGIBILITY WHEN FAMILIES REACH THE TOP OF THE WAITING LIST. WE SCREEN FOR CRIMINAL OR DRUG RELATED ACTIVITY ALONG WITH RENTAL HISTORY.

##### (2) WAITING LIST ORGANIZATION

CHA USES A JURISDICTION- WIDE WAITING LIST. INDIVIDUALS MAY APPLY AT CHA'S MAIN ADMINISTRATIVE OFFICE

##### (3) ADMISSION PREFERENCES

CHA IS ASKING FOR COMMUNITY INPUT TO REMOVE THE ESTABLISHED PREFERENCES FOR ADMISSIONS TO THE PUBLIC HOUSING PROGRAM AND THE HOUSING CHOICE VOUCHER PROGRAM. CURRENTLY, THE PREFERENCES ARE ELDERLY (OVER AGE 62) AND DISABLED. IF PREFERENCES ARE REMOVED, APPLICANTS WILL REACH THE TOP OF THE WAITING LIST AS OF THE DATE AND TIME OF APPLICATION.

(4) OCCUPANCY

APPLICANTS AND RESIDENTS CAN USE THE PHA –RESIDENT LEASE, THE PHA’S ADMISSIONS AND CONTINUED OCCUPANCY POLICY AND PHA BRIEFING SEMINARS AND WRITTEN MATERIALS TO OBTAIN INFORMATION ABOUT THE RULES OF OCCUPANCY OF PUBLIC HOUSING.

B. HOUSING CHOICE VOUCHER (SECTION 8)

(1) ELIGIBILITY

CHA CONDUCTS CRIMINAL OR DRUG RELATED BACKGROUND CHECKS BY OBTAINING CRIMINAL RECORDS FOR THE NATRONA CLERK OF COURT AND STRAIGHT ARROW TENANT SCREENING SERVICE.

(2) WAITING LIST ORGANIZATION

CHA USES A JURISDICTION – WIDE WAITING LIST. INDIVIDUALS MAY APPLY AT CHA’S MAIN ADMINISTRATIVE OFFICE OR ON CHA’S WEBSITE, [www.chaoffice.org](http://www.chaoffice.org)

(3) SEARCH TIME

CHA WHEN ISSUING A HCV GIVES THE MAXIMUM 120 DAY PERIOD DUE TO THE LACK OF AFFORDABLE HOUSING UNITS AND THE INCREASED RENTS BEING CHARGED.

**2. Financial Resources**

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>1. Federal Grants (CY 2009 grants)</b>		
a) Public Housing Operating Fund	\$ 267,091.00	
b) Public Housing Capital Fund	\$ 117,796.00	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	\$ 1,676,124.00	
f) Resident Opportunity and Self-Sufficiency Grants		
g) Community Development Block Grant		
h) HOME		
<b>2. Prior Year Federal Grants (unobligated funds only) (list below)</b>		
<b>3. Public Housing Dwelling Rental Income (4/09 – 12/09)</b>	\$ 139,943.77	
<b>4. Other income (list below)</b>		
<b>4. Non-federal sources (list below)</b>		

<b>Financial Resources: Planned Sources and Uses</b>		
<b>Sources</b>	<b>Planned \$</b>	<b>Planned Uses</b>
<b>Total resources</b>	<b>\$ 2,200,954.77</b>	

### **3. RENT DETERMINATION**

**A. PUBLIC HOUSING**

**(1) INCOME BASED RENT POLICIES**

- A. THE PHA WILL NOT EMPLOY ANY DISCRETIONARY RENT-SETTING POLICIES FOR INCOME BASED RENT IN PUBLIC HOUSING. INCOME-BASED RENTS ARE SET AT H IGHER OF 30% OF ADJUSTED MONTHLY INCOME, THE WELFARE RENT, OR MINIMUM RENT (LESS HUD MANDATORY DEDUCTIONS AND EXCLUSIONS).**
- B. CHA HAS INSTITUTED A MINIMUM RENT OF \$50 PER MONTH**
- C. CHA DOES NOT HAVE CEILING RENTS (RENTS SET AT A LEVEL LOWER THAN 30% OF ADJUSTED INCOME)**
- D. RENT RE-DETERMINATION  
CHA RE-DETERMINES TENANT RENTS BETWEEN ANNUAL RE-EXAMINATIONS WHEN THERE IS A CHANGE IN HOUSEHOLD COMPOSITION AND A DECREASE IN INCOME.**

**(2) FLAT RENTS**

**CHA USED THE SECTION 8 RENT REASONABLENESS STUDY OF COMPARABLE HOUSING AND THE SURVEY OF RENTS LISTED IN LOCAL NEWSPAPER WHEN SETTING FLAT RENTS.**

**B. SECTION 8 TENANT- BASED ASSISTANCE**

**(1) PAYMENT STANDARDS**

**CHA IS USING 110% OF THE 50 PERCENTILE FMR WITH APPROVAL FROM THE DENVER REGIONAL OFFICE.**

**CHA IS USING THE HIGHER FMR TO ENSURE SUCCESS AMONG ASSISTED FAMILIES AND INCREASE HOUSING OPTIONS FOR FAMILIES**

**PAYMENT STANDARDS ARE REEVALUATED ANNUALLY. WE CONSIDER THESE FACTORS WHEN DETERMINING THE ADEQUACY OF THE PAYMENT STANDARD.**

- A. SUCCESS RATES OF FAMILIES**
- B. RENT BURDENS OF ASSISTED FAMILIES**

**(2) CHA HAS INSTITUTED A MINIMUM RENT OF \$50 PER MONTH. CHA HAS NOT ADOPTED ANY MINIMUM RENT HARDSHIP EXEMPTION POLICIES.**

### **4. OPERATIONS AND MANAGEMENT**

**A. MANAGEMENT AND MAINTENANCE POLICIES**

**CHA HAS ADOPTED PUBLIC HOUSING MANAGEMENT AND MAINTENANCE POLICY DOCUMENTS AND MANUALS THAT THAT CONTAIN THE AGENCY'S RULES, STANDARDS, AND POLICIES THAT GOVERN MAINTENANCE AND MANAGEMENT OF PUBLIC HOUSING AND THE POLICIES GOVERNING SECTION 8 MANAGEMENT, INCLUDING THE FOLLOWING:**

- (1) PUBLIC HOUSING:  
ADMISSIONS AND CONTINUED OCCUPANCY POLICY  
MAINTENANCE POLICY**
- (2) SECTION 8  
SECTION 8 ADMINSTRATIVE PLAN**

## **5. GRIEVANCE PROCEDURES**

### **A. PUBLIC HOUSING**

CHA HAS ESTABLISHED A WRITTEN GRIEVANCE PROCEDURES IN ADDITION TO FEDERAL REQUIREMENTS FOUND AT 24 CFR PART 966, SUBPART B, FOR RESIDENTS OF PUBLIC HOUSING. WE ARE CURRENTLY REVIEWING AND UPDATING THE GRIEVANCE PROCEDURES AND ALLOWING THE PH RESIDENTS A 30- DAY COMMENT PERIOD. WE ANTICIPATE THE NEW CHANGES TO BE EFFECTIVE APRIL 1, 2010.

### **B. SECTION 8 TENANT-BASED ASSISTANCE**

CHA HAS 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.

## **6. DESIGNATED HOUSING FOR ELDERLY AND DISABLED FAMILIES**

CURRENTLY CHA HAS 10 UNITS DESIGNATED ELDERLY/DISABLED IN PIC AND DOES NOT INTEND TO APPLY FOR ANY MORE DESIGNATED UNITS, IN THE UPCOMING FISCAL YEAR.

## **7. COMMUNITY SERVICE AND SELF-SUFFICIENCY**

CHA COORDINATES EFFORTS BETWEEN THE TANF AGENCY THROUGH CLIENT REFERRALS AND INFORMATION SHARING REGARDING MUTUAL CLIENTS (FOR RENT DETERMINATIONS AND OTHERWISE)

CHA HAS IMPLEMENTED THE COMMUNITY SERVICE REQUIREMENT IN ACCORDANCE WITH REGULATIONS.

## **8. SAFETY AND CRIME PREVENTION**

CHA HAS PRIMARILY BASED THE NEED FOR MEASURES TO ENSURE THE SAFETY OF PUBLIC HOUSING RESIDENTS ON RESIDENT COMMENTS AND PHONE INQUIRES THAT REFER TO SAFETY AS A GENERAL CONCERN.

## **9. PETS**

CHA HAS INCLUDED THE PET POLICY IN THE PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY POLICY IN ACCORDANCE WITH HUD GUIDANCE. THE PET POLICY IS APPLICABLE TO ALL INDIVIDUALS IN PUBLIC HOUSING AND PERMITS THEM TO HAVE A PET WITHIN ADOPTED RESTRICTITONS.

## **10. CIVIL RIGHTS CERTIFICATION**

CHA EXAMINES ITS PROGRAMS AND PROPOSED PROGRAM TO IDENTIFY ANY IMPEDIMENTS TO FAIR HOUSING CHOICE WITHIN THOSE PROGRAMS; ADDRESSES THE IMPEDIMENTS IN A REASONABLE MANNER IN VIEW OF THE RESOURCES AVAILABLE; AND ASSURES THAT THE ANNUAL PLAN IS CONSISTENT WITH ANY APPLICABLE CONSOLIDATED PLAN FOR ITS JURISDICTION.

## **11. FISCAL YEAR AUDIT**

CHA ENDED THE MOST RECENT FISCAL YEAR WITH A POSITIVE NET CASH FLOW IN ALL PROGRAMS. THERE WERE SEVERAL FINDINGS IN REGARDS TO INTERNAL CONTROL PROCEDURES. CHA HAS ADDRESSED THE FINDINGS AND IMPLEMENTED NECESSARY CONTROLS TO ENSURE CHANGE. DURING THE LAST FISCAL YEAR, CHA HAS SWITCHED TO AN ACCOUNTING FIRM IN INDIANA THAT IS COMPETENT AND FAMILIAR WITH HUD REGULATIONS.

## **12. ASSET MANAGEMENT**

CHA HAS ELECTED TO NOT CONVERT TO THE HUD-PROJECT BASED ASSET MANAGEMENT.

## **13. VIOLENCE AGAINST WOMEN ACT (VAWA)**

CHA IS COMMITTED TO WORK WITH THE LOCAL SHELTER AND ACCEPTS REFERRALS AND MAKES REFERRALS TO THE SELF HELP CENTER FOR VICTIMS OF DOMESTIC VIOLENCE.

The Housing Authority – City of Casper held a Public Meeting for the PHA Plan for FY 2010 on Wednesday February 3, 2010 at 5:00 pm. The meeting was held in the Cafeteria located at Life Steps Campus, 1514 E. 12<sup>th</sup> Street, #105 Casper, WY 82601.

Those in attendance were LuAnn Allhusen, Executive Director and Colleen Rippeth, Special Projects Coordinator.

There were no public comments and no one in attendance.

The Housing Authority – City of Casper as of 4/1/2010 will not be assigning preferences to elderly or disabled individuals. All individuals applying as of 4/1/2010 will be added to the waiting lists as the date and time the application was received.

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The Housing Authority – City of Casper was informed by the regional HUD office that the Annual Plan originally submitted was not the correct plan and we also needed to submit the correct 5 Year Plan. CHA advertised the PHA Plan again for the required 45 day comment period.

A Public Meeting for the PHA Plan for FY 2010 was held on Tuesday April 7, 2010 at 5:00 pm. The meeting was held in the Cafeteria located at Life Steps Campus, 1514 E. 12<sup>th</sup> Street, #105 Casper, WY 82601.

Those in attendance were LuAnn Allhusen, Executive Director and Colleen Rippeth, Special Projects Coordinator.

There were no public comments and no one in attendance.

The Housing Authority – City of Casper as of 6/1/2010 will not be assigning preferences to elderly or disabled individuals. All individuals applying as of 6/1/2010 will be added to the waiting lists as the date and time the application is received.

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 OMB No. 2577-0226  
 Expires 4/30/2011

<b>Part I: Summary</b>		<b>PHIA Name: Housing Authority of the City of Casper</b>		<b>Grant Type and Number</b> Capital Fund Program Grant No: Replacement Housing Factor Grant No: Date of CFFP: 2010		<b>FFY of Grant: 2010</b> FFY of Grant Approval:	
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Line	Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:	Reserve for Disasters/Emergencies <input type="checkbox"/>	Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report	Total Estimated Cost		Total Actual Cost <sup>1</sup>	
				Original	Revised <sup>2</sup>	Obligated	Expended
1	Total non-CFFP Funds						
2	1406 Operations (may not exceed 20% of line 21) <sup>3</sup>			\$ 117,796.00			
3	1408 Management Improvements						
4	1410 Administration (may not exceed 10% of line 21)						
5	1411 Audit						
6	1415 Liquidated Damages						
7	1430 Fees and Costs						
8	1440 Site Acquisition						
9	1450 Site Improvement						
10	1460 Dwelling Structures						
11	1465.1 Dwelling Equipment—Nonependable						
12	1470 Non-dwelling Structures						
13	1475 Non-dwelling Equipment						
14	1485 Demolition						
15	1492 Moving to Work Demonstration						
16	1495.1 Relocation Costs						
17	1499 Development Activities <sup>4</sup>						

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFFP Grants for operations.  
<sup>4</sup> RHIF funds shall be included here.

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
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<b>Part I: Summary</b>		FFY of Grant: 2010	
PHA Name: Housing Authority of the City of Casper	Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: Date of CFFP: 2010	FFY of Grant Approval:	
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost <sup>1</sup>
18a	1501 Collateralization or Debt Service paid by the PHA	Original	Obligated
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$ 117,796.00	
21	Amount of line 20 Related to LBP Activities		
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security - Soft Costs		
24	Amount of line 20 Related to Security - Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures		
Signature of Executive Director <i>Judith Allmeier</i>		Date 2-3-10	Signature of Public Housing Director
			Date

<sup>1</sup> To be completed for the Performance and Evaluation Report  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.  
<sup>4</sup> RHF funds shall be included here.



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

U.S. Department of Housing and Urban Development  
 Office of Public and Indian Housing  
 Expires 4/30/2011

**Part I: Summary**

PHA Name/Number of Casper - WY004		Housing Authority of the City of Casper		Locality (City/County & State) Casper, Wyoming			<input checked="" type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revision No:	
A.	Development Number and Name	Work Statement for Year 1 FFY 2010	Work Statement for Year 2 FFY 2011	Work Statement for Year 3 FFY 2012	Work Statement for Year 4 FFY 2013	Work Statement for Year 5 FFY 2014		
B.	Physical Improvements Subtotal	6000000	85590550					
C.	Management Improvements							
D.	PHA-Wide Non-dwelling Structures and Equipment							
E.	Administration							
F.	Other							
G.	Operations		\$ 117,796.00	\$ 117,796.00	\$ 117,796.00	\$ 117,796.00	\$ 117,796.00	\$ 117,796.00
H.	Demolition							
I.	Development							
J.	Capital Fund Financing - Debt Service							
K.	Total CFP Funds		\$ 117,796.00	\$ 117,796.00	\$ 117,796.00	\$ 117,796.00	\$ 117,796.00	\$ 117,796.00
L.	Total Non-CFP Funds							
M.	Grand Total		\$ 117,796.00	\$ 117,796.00	\$ 117,796.00	\$ 117,796.00	\$ 117,796.00	\$ 117,796.00

Capital Fund Program—Five-Year Action Plan

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
Expires 4/30/2011

Part I: Summary (Continuation)

PHA Name/Number		Locality (City/county & State)				
Development Number	Work Statement for Year 1 FFY 2010	Work Statement for Year 2 FFY 2011	Work Statement for Year 3 FFY 2012	<input checked="" type="checkbox"/> Original 5-Year Plan Work Statement for Year 4 FFY 2013	<input type="checkbox"/> Revision No: Work Statement for Year 5 FFY 2014	
HA Wide	Approach Statement	Yard sprinkler systems	Replace gutters and downspouts	Replace siding	Drainage repairs	
HA Wide		Window coverings	Exterior doors	Bathroom vanities	Playgrounds & amenities	
HA Wide		Kitchen cabinets	Sewer Systems	Hot water heaters	Phone system (Office)	
HA Wide		Baseboard heaters/covers	Meth Cleanup	Windows	Roofing	
HA Wide		Computers (network, software, printers, and hardware)	Electrical systems	Maintenance trailer	Storm Doors	
HA Wide		Landscaping	Energy conservation	Safety and Code modifications for interiors	Concrete work - replace/repair	
HA Wide		Parking Lots	Garage Doors	Air conditioning	Heating systems/Boilers	
HA Wide		Security cameras	Office space renovations	Carbon Monoxide detectors	Appliances	
HA Wide		Exterior paint of siding	Flooring	Fencing	Structural repairs	
HA Wide		Modernization of unit interiors	Venting upgrades	Storage units	Signage	
HA Wide		Security Lighting	Plumbing systems/fixtures	Crawl space modifications	Modernization of Maintenance Shop	

**PHA Certifications of Compliance with the PHA Plans and Related Regulations:  
Board Resolution to Accompany the PHA 5-Year and Annual PHA Plan**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the  5-Year and/or  Annual PHA Plan for the PHA fiscal year beginning 4/1/10, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:*

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA certifies that there has been no change, significant or otherwise, to the Capital Fund Program (and Capital Fund Program/Replacement Housing Factor) Annual Statement(s), since submission of its last approved Annual Plan. The Capital Fund Program Annual Statement/Annual Statement/Performance and Evaluation Report must be submitted annually even if there is no change.
4. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
7. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. For PHA Plan that includes a policy for site based waiting lists:
  - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2006-24);
  - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
  - Adoption of site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
  - The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing;
  - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
11. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.

12. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
13. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
14. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
15. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
16. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
17. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
18. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
19. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
20. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
21. The PHA provides assurance as part of this certification that:
  - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
  - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
  - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
22. The PHA certifies that it is in compliance with all applicable Federal statutory and regulatory requirements.

Housing Authority of the City of Casper  
 PHA Name

WY004  
 PHA Number/HA Code

5-Year PHA Plan for Fiscal Years 20 10 - 20 15

Annual PHA Plan for Fiscal Years 20 10 - 20 11

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

Name of Authorized Official <u>Echo Bale</u>	Title <u>Board of Commissioners, Chairperson</u>
Signature <u>Echo Bale</u>	Date <u>4/20/2010</u>

**Civil Rights Certification**

**U.S. Department of Housing and Urban Development**  
Office of Public and Indian Housing  
**Expires 4/30/2011**

**Civil Rights Certification**

**Annual Certification and Board Resolution**

*Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioner, I approve the submission of the Plan for the PHA of which this document is a part and make the following certification and agreement with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:*

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990, and will affirmatively further fair housing.

Housing Authority of the City of Casper

WY004

PHA Name

PHA Number/HA Code

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)	
Name of Authorized Official <i>Echo Bale</i> Echo Bale	Title Board of Commissioners, Chairperson
Signature ↓ ↑ Echo Bale	Date 4/20/2010

# Certification for a Drug-Free Workplace

U.S. Department of Housing and Urban Development

Applicant Name

Housing Authority of the City of Casper

Program/Activity Receiving Federal Grant Funding

Housing Choice Voucher Program, Public Housing Operating Fund, and Capital Fund Program

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

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

a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

b. Establishing an on-going drug-free awareness program to inform employees ---

(1) The dangers of drug abuse in the workplace;

(2) The Applicant's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;

d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will ---

(1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

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

Main Office: 1514 E. 12th Street, #105  
Casper, WY 82601

75 Public Housing units scattered throughout Casper, WY

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

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

**Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties.  
(18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

LuAnn Allhusen

Title

Executive Director

Signature

X *LuAnn Allhusen*

Date

07/30/2010

**Certification of Payments  
to Influence Federal Transactions**

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

Applicant Name

Housing Authority of the City of Casper

Program/Activity Receiving Federal Grant Funding

Housing Choice Voucher Program, Public Housing Operating Fund, and the Capital Fund Program

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

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

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

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

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

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

**Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties.  
(18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official  LuAnn Allhusen	Title  Executive Director
Signature  	Date (mm/dd/yyyy)  07/30/2010

## DISCLOSURE OF LOBBYING ACTIVITIES

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

Approved by OMB

0348-0046

(See reverse for public burden disclosure.)

<b>1. Type of Federal Action:</b> <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	<b>2. Status of Federal Action:</b> <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	<b>3. Report Type:</b> <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change <b>For Material Change Only:</b> year _____ quarter _____ date of last report _____
<b>4. Name and Address of Reporting Entity:</b> <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known:  Congressional District, if known: 4c 1st	<b>5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime:</b>  Congressional District, if known:	
<b>6. Federal Department/Agency:</b> U.S. Department of Housing and Urban Development	<b>7. Federal Program Name/Description:</b> Operating Fund Program and Capital Fund Program CFDA Number, if applicable: _____	
<b>8. Federal Action Number, if known:</b>	<b>9. Award Amount, if known:</b> \$	
<b>10. a. Name and Address of Lobbying Registrant</b> (if individual, last name, first name, MI):	<b>b. Individuals Performing Services</b> (including address if different from No. 10a) (last name, first name, MI):	
<b>11.</b> Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	Signature: <u>LuAnn Allhusen</u> Print Name: <u>LuAnn Allhusen</u> Title: <u>Executive Director</u> Telephone No.: <u>307 266-1388</u> Date: <u>7/30/2010</u>	
<b>Federal Use Only:</b>		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)