

1.0	PHA Information PHA Name: <u>Pickaway Metropolitan Housing Authority</u> PHA Code: <u>OH059</u> PHA Type: <input type="checkbox"/> Small <input checked="" type="checkbox"/> High Performing <input type="checkbox"/> Standard <input type="checkbox"/> HCV (Section 8) PHA Fiscal Year Beginning: (MM/YYYY): <u>01/2012</u>																										
2.0	Inventory (based on ACC units at time of FY beginning in 1.0 above) Number of PH units: <u>108</u> Number of HCV units: <u>635</u>																										
3.0	Submission Type <input type="checkbox"/> 5-Year and Annual Plan <input checked="" type="checkbox"/> Annual Plan Only <input type="checkbox"/> 5-Year Plan Only																										
4.0	PHA Consortia <input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below.)																										
	<table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2" style="width:35%;">Participating PHAs</th> <th rowspan="2" style="width:5%;">PHA Code</th> <th rowspan="2" style="width:25%;">Program(s) Included in the Consortia</th> <th rowspan="2" style="width:20%;">Programs Not in the Consortia</th> <th colspan="2" style="width:15%;">No. of Units in Each Program</th> </tr> <tr> <th style="width:5%;">PH</th> <th style="width:10%;">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:					
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:																											
5.0	5-Year Plan. Complete items 5.1 and 5.2 only at 5-Year Plan update.																										
5.1	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 for the next five years:																										
5.2	Goals and Objectives. 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.																										
6.0	PHA Plan Update (a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission: (b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions. <div style="text-align: center;">See attached</div>																										
7.0	Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. Include statements related to these programs as applicable.																										
8.0	Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable. <div style="text-align: center;">See attached</div>																										
8.1	Capital Fund Program Annual Statement/Performance and Evaluation Report. 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. <div style="text-align: center;">See attached</div>																										
8.2	Capital Fund Program Five-Year Action Plan. 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. <div style="text-align: center;">See attached</div>																										
8.3	Capital Fund Financing Program (CFFP). <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.																										
9.0	Housing Needs. 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. <div style="text-align: center;">Required only in 5 Year Plan but analysis prepared and attached</div>																										

9.1	<p>Strategy for Addressing Housing 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. Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan. Required only in 5 year plan but completed and attached</p>
10.0	<p>Additional Information. Describe the following, as well as any additional information HUD has requested.</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"</p> <p style="text-align: right;">Required only in 5 year plan but completed and attached</p>
11.0	<p>Required Submission for HUD Field Office Review. 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. Note: 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>



OFFICE OF PUBLIC HOUSING

U.S. Department of Housing and Urban Development

Cleveland Area Office, Region V – Midwest Region
U.S. Bank Centre Building
1350 Euclid Avenue, Suite 500
Cleveland, OH 44115-1815

NOV 02 2010

Ms. Kim Hartinger
Executive Director
Pickaway Metropolitan Housing Authority
176 Rustic Drive
Circleville, OH 43113-1500

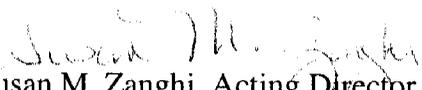
**SUBJECT: Actual Comprehensive Grant Cost Certificate (ACGCC) and
Final Performance and Evaluation Report (P&E) for
OH16P059501-08**

Dear Ms. Hartinger:

Thank you for submitting the ACGCC (form HUD-52839) and the P&E (form HUD-50075.1) for CFP grant OH16P059501-08. Please note that the ACGCC document must be included as a financial statement in your next scheduled fiscal audit conducted by the independent auditor.

If you have any questions, please contact Andrea Vrankar of my staff at (216) 357-7751 or andrea.vrankar@hud.gov.

Sincerely,


Susan M. Zanghi, Acting Director
Finance and Facilities Management Division
Cleveland Office of Public Housing

Enclosure(s)

**Actual Comprehensive Grant
Cost Certificate**
Comprehensive Grant Program (CGP)

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

OMB Approval No. 2577-0157
(Exp. 11/30/2008)

PHA/IHA Name Pickaway Metropolitan Housing Authority	Comprehensive Grant Number OH16-P059-501-08
	FFY of Grant Approval FY2008

The PHA/IHA hereby certifies to the Department of Housing and Urban Development as follows:

1. That the total amount of Modernization Cost (herein called the "Actual Modernization Cost") of the Comprehensive Grant, is as shown below:

A. Original Funds Approved	\$	198,561.00
B. Revised Funds Approved	\$	198,561.00
C. Funds Advanced	\$	198,561.00
D. Funds Expended (Actual Modernization Cost)	\$	198,561.00
E. Amount to be Recaptured (A-D)	\$	0.00
F. Excess of Funds Advanced (C-D)	\$	0.00

2. That all modernization work in connection with the Comprehensive Grant has been completed;

3. That the entire Actual Modernization Cost or liabilities therefor incurred by the PHA have been fully paid;

4. That there are no undischarged mechanics', laborers', contractors', or material-men's liens against such modernization work on file in any public office where the same should be filed in order to be valid against such modernization work; and

5. That the time in which such liens could be filed has expired.

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)

Signature <i>Kym Hartinger</i>	Date 10/20/2010
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For HUD Use Only

The Cost Certificate is approved for audit.

Approved for Audit (Director, Public Housing Division) <i>Susan M. Banfi</i>	Date 10/26/10
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The audited costs agree with the costs shown above.

Verified (Director, Public Housing Division)	Date
Approved (Field Office Manager)	Date

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

Part I: Summary		Grant Type and Number Capital Fund Program Grant No. OH16-P059-501-08 Replacement Housing Factor Grant No: Date of CFP:		FFY of Grant: FY2008	FFY of Grant Approval:
PHA Name: Pickaway Metropolitan Housing Authority					
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Original	Total Estimated Cost	Obligated	Total Actual Cost ¹ Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³	15,000.00	15,000.00	15,000.00	15,000.00
3	1408 Management Improvements	7,479.28	7,479.28	7,479.28	7,479.28
4	1410 Administration (may not exceed 10% of line 21)	92.04	92.04	92.04	92.04
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	3,342.20	3,342.20	3,342.20	3,342.20
8	1440 Site Acquisition				
9	1450 Site Improvement	12,681.20	12,681.20	12,681.20	12,681.20
10	1460 Dwelling Structures	82,664.30	82,664.30	82,664.30	82,664.30
11	1465 11 Dwelling Equipment—Nonexpendable	28,380.60	28,380.60	28,380.60	28,380.60
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment	48,921.38	48,921.38	48,921.38	48,921.38
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				
18a	1501 Collateralization or Debt Service paid by the PHA				
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)	198,561.00	198,561.00	198,561.00	198,561.00
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities	17,710.79	17,710.79	17,710.79	17,710.79
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	44,873.68	44,873.68	44,873.68	44,873.68

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF 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
 Office of Public and Indian Housing
 Expires 4/30/2011

Part I: Summary		FFY of Grant: FY2008	
PHA Name: Pickaway Metropolitan Housing Authority		FFY of Grant Approval:	
Grant Type and Number Capital Fund Program Grant No. OH16-P059-501-08 Replacement Housing Factor Grant No. _____		Date of CFFP: _____	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: _____		<input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Final Performance and Evaluation Report	
Line Summary by Development Account		Total Estimated Cost	Total Actual Cost ¹
Signature of Executive Director <i>Kyra Hartung</i>		Original Date October 20, 2010	Revised ² Signature of Public Housing Director
		Obligated	Expended



OFFICE OF PUBLIC HOUSING

U.S. Department of Housing and Urban Development

Cleveland Area Office, Region V -- Midwest Region
U.S. Bank Centre Building
1350 Euclid Avenue, Suite 500
Cleveland, OH 44115-1815

APR 01 2010

Ms. Kim Hartinger
Executive Director
Pickaway Metropolitan Housing Authority
176 Rustic Drive
Circleville, OH 43113-1500

**SUBJECT: Actual Comprehensive Grant Cost Certificate ("ACGCC") and
Final Performance and Evaluation Report ("P&E") for
OH16S059501-09**

Dear Ms. Hartinger:

Thank you for submitting the ACGCC (form HUD-52839) and the P&E (form HUD-50075.1) for CFP grant OH16S059501-09. Please note that the ACGCC document must be included as a financial statement in your next scheduled fiscal audit conducted by the independent auditor.

If you have any questions, please contact Andrea Vrankar of my staff at (216) 522-4058 extension 7128 or andrea.vrankar@hud.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Shawn M. Sweet".

for Shawn M. Sweet, Director
Finance and Facilities Management Division
Cleveland Office of Public Housing

Enclosure(s)

**Actual Comprehensive Grant
Cost Certificate**
Comprehensive Grant Program (CGP)

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

OMB Approval No. 2577-0157
(Exp. 11/30/2008)

PHA/IHA Name Pickaway Metropolitan Housing Authority	Comprehensive Grant Number OH16S05950109
	FFY of Grant Approval FY2009ARRA

The PHA/IHA hereby certifies to the Department of Housing and Urban Development as follows:

1. That the total amount of Modernization Cost (herein called the "Actual Modernization Cost") of the Comprehensive Grant, is as shown below:

A. Original Funds Approved	\$ 251,339.00
B. Revised Funds Approved	\$ 251,339.00
C. Funds Advanced	\$ 251,339.00
D. Funds Expended (Actual Modernization Cost)	\$ 251,339.00
E. Amount to be Recaptured (A-D)	\$ -0-
F. Excess of Funds Advanced (C-D)	\$ -0-

2. That all modernization work in connection with the Comprehensive Grant has been completed;

3. That the entire Actual Modernization Cost or liabilities therefor incurred by the PHA have been fully paid;

4. That there are no undischarged mechanics', laborers', contractors', or material-men's liens against such modernization work on file in any public office where the same should be filed in order to be valid against such modernization work; and

5. That the time in which such liens could be filed has expired.

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)

Signature <i>Kim Hartinger, Executive Director</i>	Date 03-30-2010
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For HUD Use Only

The Cost Certificate is approved for audit.

Approved for Audit (Director, Public Housing Division) <i>T Marshall</i>	Date 3/31/2010
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The audited costs agree with the costs shown above.

Verified (Director, Public Housing Division)	Date
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Approved (Field Office Manager)	Date
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*MV
3/31/10*

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

Part I: Summary

PHA Name: Pickaway Metropolitan Housing Authority	Grant Type and Number Capital Fund Program Grant No: OH16S05950109	Replacement Housing Factor Grant No:	FY of Grant: FY2009ARRA
	Date of CFFP:		FY of Grant Approval:

Line	Type of Grant <input 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 checked="" type="checkbox"/> Final Performance and Evaluation Report		Total Actual Cost ¹	
			Original	Revised ²	Obligated	Expended
1	Summary by Development Account					
2	Total non-CFP Funds					
3	1406 Operations (may not exceed 20% of line 21) ³					
4	1408 Management Improvements					
5	1410 Administration (may not exceed 10% of line 21)	100.00	0.00	0.00	0.00	
6	1411 Audit					
7	1415 Liquidated Damages					
8	1430 Fees and Costs	20,000.00	20,100.00	20,100.00	20,100.00	
9	1440 Site Acquisition					
10	1450 Site Improvement					
11	1460 Dwelling Structures	231,239.00	231,239.00	231,239.00	231,239.00	
12	1465 I Dwelling Equipment—Nonependable					
13	1470 Non-dwelling Structures					
14	1475 Non-dwelling Equipment					
15	1485 Demolition					
16	1492 Moving to Work Demonstration					
17	1495 I Relocation Costs					
18a	1499 Development Activities ⁴					
18ba	1501 Collateralization or Debt Service paid by the PHA					
18bb	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)	251,339.00	251,339.00	251,339.00	251,339.00	
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					

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

APPROVED
 3/24/11

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
 Expires 4/30/2011

Part I: Summary						
PIA Name: Pickaway Metropolitan Housing Authority	Grant Type and Number Capital Fund Program Grant No: OH16S05950109 Date of CFFP: _____					
	Replacement Housing Factor Grant No: _____					
FFY of Grant: FY2009ARRA	FFY of Grant Approval:					
<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Original Annual Statement <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	Revised ²	Obligated	Total Actual Cost ¹	Expended
Signature of Executive Director <i>Kyma Hutchings</i>		Date 3-30-2010	Signature of Public Housing Director <i>T. M. Marsh</i>		Date 3/31/2010	

APPROVED
 3/31/10

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 3/31/2014

Part I: Summary		Grant Type and Number		FFY of Grant: FY2009	
PHA Name: Pickaway Metropolitan Housing Authority		Capital Fund Program Grant No: OH16-P059-501-09		FFY of Grant Approval:	
Date of CFFP:		Replacement Housing Factor Grant No:			
Type of Grant		Reserve for Disasters/Emergencies		Revised Annual Statement (revision no:)	
Original Annual Statement		Final Performance and Evaluation Report		Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost	Obligated	Total Actual Cost ¹	Expended
		Original	Revised ²		
1	Total non-CFFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³	20,000.00	20,000.00	20,000.00	20,000.00
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	22,000.00	18,656.56	18,656.56	15,241.92
8	1440 Site Acquisition	20,000.00	7,946.80	7,946.80	6,271.81
9	1450 Site Improvement	110,922.00	142,818.64	142,818.64	50,885.12
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment	25,000.00	8,500.00	8,500.00	8,500.00
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFFP Grants for operations.
⁴ RHF 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

Part I: Summary		FFY of Grant: 2009	
PHA Name: Pickaway Metropolitan Housing Authority	Grant Type and Number Capital Fund Program Grant No: OH16-P059-501-09 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval:	
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 07/31/2011 <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Summary by Development Account <input type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost¹
		Original	Obligated
18a	1501 Collateralization or Debt Service paid by the PHA		
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)	197,922.00	197,922.00
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>Kim Hartung</i>		Date 07/29/2011	Signature of Public Housing Director
			Date

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHF 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
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 3/31/2014

Part I: Summary		Grant Type and Number		FFY of Grant: FY2010	
PHA Name: Pickaway Metropolitan Housing Authority		Capital Fund Program Grant No: OHI6-P059-501-10 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant Approval:	
Type of Grant	<input type="checkbox"/> Original Annual Statement x Performance and Evaluation Report for Period Ending: 07-31-2011	<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report	Revised Annual Statement (revision no:)		
Line	Summary by Development Account	Total Estimated Cost	Obligated	Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³	20,000.00	15,784.35	-0-	-0-
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	20,000.00	21,811.77	11,811.77	1,976.41
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	156,067.00	158,470.88	138,747.32	15,356.40
11	1465.1 Dwelling Equipment—Nonexpendable				
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 ⁴				

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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

Part I: Summary		FFY of Grant: 2010 FFY of Grant Approval:	
PHA Name: Pickaway Metropolitan Housing Authority	Grant Type and Number Capital Fund Program Grant No: OH16-P059-501-10 Replacement Housing Factor Grant No: Date of CFFP:		
<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 07/31/2011		<input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Final Performance and Evaluation Report	
Type of Grant	Summary by Development Account	Total Estimated Cost	Total Actual Cost¹
		Original	Obligated
		Revised²	Expended
18a	1501 Collateralization or Debt Service paid by the PHA		
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)	196,067.00	150,599.09
21	Amount of line 20 Related to LBP Activities		17,332.81
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>Kym Heston</i>		Date 07/29/2011	Signature of Public Housing Director
			Date

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHF 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
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 3/31/2014

Part I: Summary		Grant Type and Number		FFY of Grant: 2011	
PHA Name: Pickaway Metropolitan Housing Authority		Capital Fund Program Grant No: OH-16-P-059-501-11 Replacement Housing Factor Grant No: Date of CFFP: 08/03/2011		FFY of Grant Approval: 2011	
Type of Grant	<input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:	<input type="checkbox"/> Reserve for Disasters/Emergencies		<input type="checkbox"/> Revised Annual Statement (revision no:)	
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Obligated	Revised ²	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³	35,000.00			
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	6,600.00			
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	116,408.00			
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment	4,900.00			
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHF 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
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary		FFY of Grant: 2011 FFY of Grant Approval: 2011				
PHA Name: Pickaway Metropolitan Housing Authority	Grant Type and Number Capital Fund Program Grant No: OH-16-P-501-11 Replacement Housing Factor Grant No: Date of CFFP:					
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"/> Summary by Development Account <input type="checkbox"/> Final Performance and Evaluation Report						
Line	Summary by Development Account	Original	Revised ²	Total Estimated Cost	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA					
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)	162,908.00				
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		Date 07/14/2011		Signature of Public Housing Director		Date

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

Resolution 11-20: Capital Fund

The Board of Commissioners of the Pickaway Metropolitan Housing Authority met in Regular Session at the Office of the Board, 176 Rustic Drive, Circleville, Ohio 43113 on Friday, July 8, 2011.

During business conducted while in session, the Board held discussion on the 2011 Capital Fund. It is anticipated that there will be a reduction in Capital Fund allocations over previous years, and it is also anticipated that the Capital Fund allocation will be issued prior to the next Board meeting. In looking at approved Five Year Plan Capital Fund projects, the Board prioritized items to be included in the 2011 Grant programs.

Based on the discussion held, Mr. Shasteen offered the motion, seconded by Ms. Schieber to adopt Resolution 11-20 as follows:

Whereas, the 2011 Capital Fund Grant allocation will be released prior to the next PMHA Board meeting, and

Whereas, the final allocation of Funds must be determined for the submission of the final grant package, and

Whereas, it is anticipated that grant funding will be reduced in 2011, then

Therefore Be It Resolved, that the Board will create a priority list of items to be included in the 2011 Capital Fund Grant program, and

Be It Further Resolved, that this list will be created based on the approved Five Year Capital Improvement Plan submitted in the 2011 Annual Plan of the agency, and

Be It Further Resolved, that based upon available grant funds, permission is given to Executive Director Kim Hartinger and Maintenance Supervisor Steven Dearth to adjust the following grant projects as necessary to accommodate the final allocation of funds, and

Be It Further Resolved that the following projects be included in the 2011 Capital Fund Grant program, in the following order of established criteria, pending information on the final Grant allocation:

- Operations at an allocation of \$20,000
- Computer replacement at an allocation of \$4,900
- HVAC replacement in Ashville and Circleville 2nd phase housing at an allocation of \$106,408
- Architectural fees and advertising costs associated with the HVAC project at an allocation of \$6,600
- Overhead garage door replacement in Circleville 1st phase housing at an allocation of \$10,000
- Purchase of a Chipper for the maintenance department at an allocation of \$15,000

- Screen door replacement in Circleville and Ashville 2nd phase housing at an allocation of \$6,250
- Solid Core Door replacement in Williamsport 3rd phase housing at an allocation of \$21,000
- House Foundation improvements in Circleville 1st phase housing at an allocation of \$45,000.

A vote on the motion was affirmed by all present. There were no nay votes recorded.
Motion carried.

Resolution 11-20 adopted.

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 8/31/2011

Part I: Summary		PHA Name: Pickaway Metropolitan Housing Authority		Grant Type and Number Capital Fund Program Grant No: OH-16-P-059-12 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant: 2012 FFY of Grant Approval: 2012	
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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 ¹	
				Original	Revised ²	Obligated	Expended
1	Total non-CFF Funds						
2	1406 Operations (may not exceed 20% of line 21) ³						
3	1408 Management Improvements			60,000.00			
4	1410 Administration (may not exceed 10% of line 21)						
5	1411 Audit						
6	1415 Liquidated Damages						
7	1430 Fees and Costs			25,000.00			
8	1440 Site Acquisition						
9	1450 Site Improvement						
10	1460 Dwelling Structures			129,000.00			
11	1465.1 Dwelling Equipment—Nonependable			100,000.00			
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 ⁴						

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFF Grants for operations.
⁴ RHF 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
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 08/31/2011

Part I: Summary		FFY of Grant: 2012	
PHA Name: Pickaway Metropolitan Housing Authority	Grant Type and Number Capital Fund Program Grant No: OH16-P059-501-12 Replacement Housing Factor Grant No: Date of CFFP:	FFY of Grant Approval: 2012	

Type of Grant
 Original Annual Statement Reserve for Disasters/Emergencies
 Performance and Evaluation Report for Period Ending: Revised Annual Statement (revision no:)
 Final Performance and Evaluation Report

Line	Summary by Development Account	Original	Total Estimated Cost Revised ²	Obligated	Total Actual Cost ¹ Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
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)		314,000.00		
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: *Kenn Hartung* Date: 10-5-2011 Signature of Public Housing Director: Date:

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ 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
 OMB No. 2577-0226
 Expires 08/30/2011

Part I: Summary

PHA Name/Number OH16P059		Locality (City/County & State) Circleville/Pickaway, Ohio		Original 5-Year Plan		Revision No:	
A.	Development Number and Name	Work Statement for Year 1 FFY 2012	Work Statement for Year 2 FFY 2013	Work Statement for Year 3 FFY 2014	Work Statement for Year 4 FFY 2015	Work Statement for Year 5 FFY 2016	
B.	Physical Improvements Subtotal	\$129,000	\$296,250	\$295,000	\$305,000		
C.	Management Improvements	\$100,000			\$40,000		
D.	PHA-Wide Non-dwelling Structures and Equipment	\$50,000	\$20,000				
E.	Administration						
F.	Other Architect, Fees, Costs	\$25,000	\$20,000	\$20,000	\$20,000	\$20,000	
G.	Operations	\$30,000	\$30,000	\$30,000	\$30,000	\$30,000	
H.	Demolition						
I.	Development						
J.	Capital Fund Financing - Debt Service						
K.	Total CFP Funds	\$334,000	\$366,250	\$385,000	\$355,000		
L.	Total Non-CFP Funds						
M.	Grand Total						

6.0 PHA Plan Update

6.0(a) Revisions in PMHA Plans since the Submission of the Previous 5-Year and Annual Plan:

A recap of changes is as follows:

- Utility Allowances were adopted for the Public Housing program based on meter reading and rate information.
- An EIV Policy was adopted for guidance to be used by the PMHA staff
- The agency approved a policy on entering units managed by PMHA. The change to this policy involved tenant generated work orders. The addendum states, "When a maintenance work order is requested, it is difficult for the PMHA maintenance staff to always arrive to do the repair when someone is home due to the number of households owned or managed by the agency (265). Therefore, PMHA practice is to enter a household if the tenant is not home when a maintenance work order request has been submitted by the resident or if a potential maintenance emergency is reported to the PMHA office or otherwise reasonably suspected to exist...
Additionally, each time a work order is requested, we will specifically ask if we have permission to enter if the resident is not home at the time maintenance arrives. If the person answers "no", our maintenance staff will then post notice on the door of the residence, stating that they will enter in 24 hours to do the maintenance repair. This meets the requirement of the lease and the Ohio Revised Code." Maintenance was instructed to never enter a unit alone if there is a child present who is a minor and no adult is present.
- The PMHA Board adopted a policy to no longer accept cash for tenant account payments at the PMHA office. Specific policy is that PMHA will no longer accept cash for any payment due over the amount of \$10.00.
- The one bedroom wait list had been closed due to length of wait time for public housing residents. In August, 2010, the PMHA Board reopened this wait list after public notice was issued.
- The PMHA Board retained Pick Collections to begin collection of Vacated Tenants Accounts Receivable.
- The Board approved the adoption of revised Voucher Payment Standards.
- The Board adopted a revision of the EIV Policy based on HUD Notice 2010-10
- The Board adopted a revision of the Drug Free Policy, expanding the screening test and the post-accident test to include amphetamines, cannabinoids, cocaine, opiates, phencyclidine, Ecstasy, barbiturates, benzodiazepines, methadone, and propoxyhene. While propoxyhene is no longer manufactured, it is still considered a street drug.
- The Board approved the addition of window and door locks and repairs as a 24 hour emergency repair for public housing and management properties.
- The agency had advertised and accepted resumes for an administrative staff assistant position. Because of funding pro-rations by HUD, it is not considered responsible at this time to proceed with filling the position. As a result, the Board approved a monthly work day for the staff in which the PMHA office is closed to the public. This work day will be the third Thursday of each month.

- The PMHA Board approved the purchase of Bed Bug heat treatment equipment and authorized the PMHA Maintenance staff to train on proper use of the equipment. The purchase was approved out of Other Business Activity funds, with an established charge to be applied to each specific program when the equipment is used. This charge is significantly less than rates charged by pest control contractors.
- The Board approved revision to the HCV Funding Shortfall Language in the Administrative Plan. The revision now reads as follows: "If it becomes apparent that a funding shortfall will occur in Housing Choice Voucher subsidy, the Housing Authority will take the following action:

The Housing Authority will take all cost saving measures available by:

- Freezing rent increases
- Immediately reducing the payment standards, with HUD approval
- Reduce subsidy standards

If these measures are not enough to prevent a funding shortfall, the Housing Authority will:

- Use termination of tenants as a last resort to prevent a shortfall
- Contact HUD for permission to terminate tenants
- Terminate tenants on a first in/first out basis, excluding elderly, handicapped and disabled households, until the shortfall is eliminated

6.0(b). Identify Where the 5-Year and Annual Plan may be Obtained by the Public.

The Pickaway MHA 5-Year and Annual Plan is available for viewing in the Lobby of the agency located at 176 Rustic Drive. A copy of the Plan is also available in the Director's office at the same location. PMHA operates under one Public Housing AMP and there are no other management offices. Copies of the Plan are distributed to each Board member and each Resident Advisory Board member. Copies are also available for the public at the PMHA office at a reproduction rate of .05 per page.

6.0(b)1. Eligibility, Selection and Admissions Policies, Including Deconcentration and Wait List Procedures.

As previously stated, the one bedroom wait list had been closed due to length of wait time for public housing residents. In August, 2010, the PMHA Board reopened this wait list after public notice was issued.

In summary, the Pickaway Metropolitan Housing Authority markets all properties in a manner that affirmatively approaches a broad mix of racial and ethnic backgrounds, as well as the aged and disabled. Both the Public Housing and Housing Choice voucher program currently have substantial waiting lists and require limited marketing. PMHA continues to introduce and promote our agency and the programs administered herein through continuous contact with local service agencies that also serve a broad mix of the eligible population. Currently only the Public Housing two bedroom wait list is closed. PMHA has 10 two bedroom units of public housing. With over 40 units of three bedroom housing, when household size reductions occur in the three bedroom inventory, we require households to relocate to a two bedroom unit. When combined

with the already established waiting list, the wait time for a two bedroom unit exceeds reasonable expectation.

Section II of the Occupancy Policy includes policy on taking applications for housing and on establishing and maintaining the waiting list. Applications can be submitted to PMHA in person, by mail, or by fax. PMHA does reserve the right to close the waiting list when application wait time exceeds one year. Public Housing waiting lists would be closed by bedroom size with public notification required.

At the time of application, PMHA requires proof of all household income, copies of birth certificates and verification of social security numbers of all persons listed on the application. Proof of preference information is also requested, but not required until the Intake appointment. Applications are only withheld from the waiting list if income documentation is not available, and applicants are allowed a thirty day period to provide documents not available at the time the application is submitted. However, all documentation must be available at the time of Intake.

Section II also discusses the procedure for Intake as it pertains to appointments, rescheduling of appointments and the need to update information on the application while the family is on the waiting list. The waiting list is purged annually. Pickaway MHA does not have site-based waiting lists.

PMHA requires applicants to be eligible for admission by qualifying as a family, qualifying by meeting income requirements, qualifying by eligible citizenship or immigrant status criteria, qualifying by documentation of social security information and qualification by processing all necessary consenting and authorizing documents necessary to provide eligibility as well as tenant rental obligations. The public housing program residents are also screened for suitability through a background screening process. The PMHA Occupancy Policy does establish criteria for meeting family status, income eligibility, citizenship and/or eligible immigration status, as well as the screening process applied to each applicant household.

The criteria for processing applications for admission, the interview and verification process are also included in the Occupancy Policy. Applicants are notified that they are scheduled for Intake and also given the opportunity to reschedule if the time and date established is not convenient.

Preferences of the Public Housing program remain as described in the Five Year Plan. 3 Points are given to victims of a natural disaster that results in long term loss of housing and is certified by a declaration of disaster by the Executive Branch of the United States of America or by state government. 2 points are given as a residency preference for families who live, work or attend school in Pickaway County at the time of application, and 1 point is given for applicants documenting Veteran Status. Veteran status will be awarded to those offering proof as a veteran of the USA armed forces or the spouse of a veteran.

Public Housing applications are organized as a permanent file and are maintained in order of bedroom size, preference and date and time of application. PMHA schedules

Intake appointments and briefings monthly if anticipation of vacancies exist. Once the agency is aware of a new vacancy, approved applicants are notified of the opportunity to lease housing on a specific date. All effort will be given to house applicants in chronological order of application date, but the unit will ultimately be leased to the first household that can take possession of the available dwelling. The Occupancy Policy addresses established occupancy criteria, with Residents given the opportunity to be placed on a range of bedroom size units, if the waiting lists are open.

The Occupancy Policy establishes the wait list as a Community-wide wait list, and establishes that 40% of newly admitted families in any fiscal year will be families whose income is at or below 30% of the area median income. PMHA will also provide for deconcentration of poverty in all scattered-site neighborhoods.

The Housing Choice Voucher program application policies are consistent with those of the Public Housing program, with these policies addressed in Section 5.2 of the agency Administrative Plan. In addition to the preferences discussed above, the Housing Choice Voucher program grants a preference for victims of domestic violence. Criteria for meeting this preference are established in the Plan and were developed with assistance from the Director of the local women's shelter. This preference has been reviewed by representatives from Southeastern Ohio Legal Aid. This preference does limit voucher allocation to eight per year. Issued vouchers under this preference continue, and a new allocation of eight domestic violence preference vouchers are reallocated each calendar year. PMHA also allocates twenty-two Family Unification Vouchers annually to be issued under recommendation by Jobs and Family Services to families who face removal of the children from the home because of nonexistent or less than satisfactory housing situations, including domestic violence related issues.

6.0(b)2. Financial Resources

The Pickaway Metropolitan Housing Authority lists the following as sources of income:

<u>Federal</u>	<u>Non-Federal</u>
Public Housing Operating Subsidy	Management Fees*
Capital Fund	OBA Rent Income**
Public Housing Rental Income	OBA Interest Income***
HCV Administrative Fees	Shelter Plus Care Grant****
HCV HAP Subsidy	TBRA CHIP Grant*****
FSS Grant	Emergency Assistance CHIP*****
Interest Income	

PMHA also receives administrative income from grant management.

*Management fees originate from the PMHA management of Pickaway Terrace, Eden Place, and Louise Terrace

**OBA Rent Income originates from Other Business Activity Rent Income

***OBA Interest Income originates from Other Business Activity Checking Account

****Shelter Plus Care grant administrative costs are solely based on time spent on the Grant by PMHA staff members.

*****The Pickaway County Commissioners apply for and receive funds for the Community Housing Improvement Grant. Part of these grant funds are traditionally set aside for Tenant Based Rental Assistance and Emergency Assistance. The Commissioners are in the process of establishing their own Grant Department, but have requested the administration of TBRA and Emergency Assistance through the Pickaway MHA. The Commissioners have recently received notification that the current grant application was funded and grant administration will begin in 2011 by PMHA.

6(b)3. Rent Determination

As previously stated, Utility Allowances were adopted for both the Public Housing and HCV programs, based on meter reading/consumption information and rate information for the previous year, and the PMHA Board approved the adoption of revised Voucher Payment Standards for the HCV program. Additionally, EIV Policy was written and adopted by the Board to authorize and govern use of the EIV system by PMHA employees.

In summary, Public Housing residents pay rents based on either the calculated method of 30% of adjusted monthly income, 10% of monthly income, or flat rent. Utility Allowance Payments, when owed, are issued directly to the utility company.

The HCV Administrative Plan addresses rent and HAP assistance to recipients of this program. The Administrative Plan establishes that the Housing Authority will not approve an initial rent or a rent increase in any of the tenant-based programs without determining that the rent amount is reasonable. Reasonableness is determined for the HCV recipient prior to the initial lease and before any increase in rent to an owner is approved, when changes in the published FMR requires review, or if the Housing Authority or HUD directs that reasonableness be re-determined. Rent reasonableness is established by comparing the rent of the unit to the rent of comparable units in the same or comparable neighborhoods.

The Administrative Plan establishes maximum subsidy calculations for the voucher program, for voucher tenancy in other federal housing programs, and for manufactured homes. The Plan also establishes the method for setting Payment Standards, and for selecting the correct payment standard for a family.

Types of assistance and rent formulas under the HCV program as outlined in the Administrative Plan include final calculations based on the Total Tenant Payment of either 10% of monthly income, 30% of adjusted monthly income, Section 8 Merged Vouchers, Section 8 Preservation Voucher, and Manufactured Home Space Rental under the Section 8 Voucher program. PMHA pays the owner the lesser of the HAP amount or the rent, with payments mailed on the first working day of the month.

Both the Public Housing program and the Housing Choice Voucher program have established minimum rents of -0-. Both programs allow for the application of the utility allowance in the rent calculation.

6.0(b)4. Operation and Management

As previously stated, the agency approved a policy on entering units managed by PMHA. The change to this policy involved tenant generated work orders. The addendum states, "When a maintenance work order is requested, it is difficult for the PMHA maintenance staff to always arrive to do the repair when someone is home due to the number of households owned or managed by the agency. Therefore, PMHA practice is to enter a household if the tenant is not home when a maintenance work order request has been requested by the resident or if a potential maintenance emergency is reported to the PMHA office or otherwise reasonably suspected to exist....Additionally, each time a work order is requested, we will specifically ask if we have permission to enter if the resident is not home at the time maintenance arrives. If the person answers "no", our maintenance staff will then post notice on the door of the residence, stating that they will enter in 24 hours to do the maintenance repair. This meets the requirement of the lease and the Ohio Revised Code." Maintenance has also been instructed to never enter a unit alone if there is a child present who is a minor and no adult is present.

As also previously stated, the PMHA Board adopted a policy to no longer accept cash. Specific policy is that PMHA will no longer accept cash for any payment due over the amount of \$10.00.

As also previously stated, the PMHA Board retained Pick Collections to begin collection of Vacated Tenants Accounts Receivable.

As also previously stated, the PMHA Board adopted a revision of the Drug Free Policy, expanding the employee screening test and the employee post-accident test to include amphetamines, cannabinoids, cocaine, opiates, phencyclidine, Ecstasy, barbiturates, benzodiazepines, methadone, and propoxyhene. While propoxyhene is no longer manufactured, it is still considered and found to be a street drug.

As also previously stated, the PMHA Board approved the addition of window and door locks and repairs as a 24 hour emergency repair for public housing and management properties.

As also previously stated, the PMHA Board approved a monthly work day for the staff at which time the office will be closed to the public. The purpose is to allow the staff to concentrate on the paperwork requirements of their position without continual interruption. Telephones are monitored hourly, with work orders completed and staff returning telephone calls.

As also previously stated, the Board approved revision to the HCV Funding Shortfall Language in the Administrative Plan that, as a last resort, will terminate tenants on a first in/first out basis, excluding elderly, handicapped and disabled households, until the shortfall is eliminated.

In summary, the Pickaway Metropolitan Housing authority has several management tools in place to appropriately administer the programs offered through the agency, including the Public Housing Occupancy Policy, the Housing Choice Voucher Administrative Plan, and specific administrative guidelines for the Shelter Plus Care

grant. Changes to those documents since the previous 5 Year Plan or Annual Plan were listed in Section 6.0.

Pickaway MHA inspects all Public Housing units on a regular basis. Quarterly pest control treatments are completed in each unit under a contract with Ohio Pest Control. Tenants with health related issues are permitted to submit documentation exempting them from this treatment. Tenants who experience pest issues in spite of the treatment are few, but when this does occur, PMHA will provide one extensive clean-out treatment. Other than infestation associated with bed bugs, PMHA experiences no pest related issues as a result of this quarterly treatment.

Eradication of bed bugs is most successful when treated with heat. As previously stated, in order to control costs, PMHA has purchased their own bed bug heat treatment system. Use of the system is charged to the specific property where the equipment is used, based on a set rate established by bedroom size plus the cost of propane. Previously adopted, the PMHA Bed Bug Policy allows for treatment without charge to the household. If subsequent infestations occur, PMHA will file to terminate the lease unless there are extenuating circumstances surrounding the reason for the infestation. This policy will remain in place pending further guidance from HUD. Tenants always have the right to appeal any termination action. The established charge for the treatment is estimated to be \$600 - \$850 depending on square footage of the unit involved and the actual cost of propane. This cost is significantly less than the \$1,000 - \$1,500 assessed by private companies. Again, the most important step in keeping PMHA properties bedbug free is the education of residents to guarantee that the infestation does not occur. PMHA takes a proactive effort to educate potential and current residents about the prevalence of bed bugs in the United States.

The Pickaway MHA also adopted a revised policy for use of the Enterprise Income Verification System. This policy is based on HUD Notices 2010-10 and 2011-21, and provides guidance for all programs utilizing the EIV System under the supervision of the agency. A copy of the policy is attached to and made a part of this plan.

6.0(b)5. Grievance Procedure Revisions Since Submission of Previous 5 Year and Annual Plan

There have been no changes to the PMHA Grievance Procedure since the most recent Annual Plan was submitted. For those denied admission to the program, the Procedure allows for an informal review of the reasons for the denial. The applicant may request this review within 14 business days of the denial.

In summary, the Procedure for requesting hearings on other PMHA decisions are set forth in any communication concerning an adverse action issued to the participant. For the Public Housing program, the participant provides the opportunity for an Informal Hearing before the Executive Director of the agency. Within 10 days of the hearing, the Director will issue a decision in writing. If that decision does not favor the resident, the resident is given the opportunity for a Formal Hearing before a Hearing Panel of three persons who are not a party to either the original decision or the decision made by the Director as part of the Informal Hearing.

The Formal Hearing offers the resident or their representative the opportunity to present documentation, evidence and arguments in the favor of the resident. The hearing panel will also receive testimony from the PMHA staff. The Formal Hearing panel also has 10 days to render their final decision. No court action will be pursued until conclusion of the final hearing.

For applicants of the Housing Choice voucher program, the PMHA will also inform the applicant of the reason for the denial and offer the opportunity for an Informal Review of the decision. Certain circumstances as outlined in the Five Year Plan and the Administrative Plan do not allow for a review. There are also certain circumstances in which HCV participants may request an informal hearing. Those are also outlined in the Five Year Plan and the Administrative Plan. In those circumstances, PMHA will give the opportunity for an informal hearing before the PMHA terminates housing assistance payments for the family under an outstanding HAP contract. Under most circumstances, the Hearing Officer in the HCV Informal Hearing will be the Executive Director. The person who does conduct the hearing must issue a written decision within 14 calendar days from the date of the hearing, stating briefly the reasons for the decision.

At all times, PMHA applicants and participants are afforded the opportunity to observe their file upon request.

6.0(b)6. Designated Housing for Elderly and Disabled Families

There are no current or planned requests for designated housing for elderly or disabled families through the Public Housing program. PMHA also manages two Rural Development 515 properties, a HUD 202, and a HUD PRAC, all with Project Based Assistance.

6.0(b)(7). Community Service and Self-Sufficiency

There have been no changes to the policies or program implementation of these programs since the previous submission.

In summary, under the resident initiatives program, the PMHA offers two flats of flowers to each public housing resident each spring. In 2010, the agency participated in a program with AEP in which fluorescent bulbs were given to each public housing household in AEP's customer base. The PMHA maintenance staff replaced all bulbs in permanent fixtures as required by the program. The PMHA maintenance staff will also replace batteries in all battery operated smoke detectors during monthly inspections in the months when switching to and from Daylight Savings Time occurs.

Additionally, PMHA requires Section 3 language in all bid contracts issued by the agency, and addresses Section 3 requirements in all pre-bid conferences. The agency also follows Section 3 hiring practices, with two current employees meeting Section 3 criteria at the time of hire.

An FSS program is administered by the agency and currently has 18 program participants, with 22 participants served year-to-date, and an average monthly escrow balance credit of \$234, with an average escrow individual balance of \$832. Since

program inception in 1993, there have been a total of 138 participants, 43 graduates, and \$189,738 in escrow pay outs.

PMHA requires Community Service participation by all residents 18 years of age or older who are not otherwise exempt.

6.0(b)8: Safety and Crime Prevention Revisions Since Submission of Previous 5 Year and Annual Plan

As previously stated, PMHA Maintenance 24 Hour Repair Items now includes the addition of window and door lock repairs as a 24 hour emergency repair for public housing and management properties.

In summary, safety and crime prevention are extremely important to PMHA. The agency works hand-in-hand with local law enforcement on these issues and is often the initial reporting source when drug use becomes present in a public housing unit. PMHA has permitted undercover investigation to be conducted from a public housing unit. The presence of this officer in the community did result in drug arrests, including the arrest and conviction of a public housing resident first identified by our staff to the police as a suspected narcotics dealer.

PMHA public housing policies permit access to each housing unit on a monthly basis, with the exception of December. Access is available through housekeeping inspections, pest control rotation, or furnace and air conditioning filter change and cleaning. This access allows PMHA staff to recognize the potential for safety and/or crime situations as they develop.

PMHA has purchased and installed fire suppression canisters on the underside of each public housing range hood in an effort to immediately douse fires that may originate on the stove top. Other safety policies to discourage fires in public housing units are being discussed and considered by the PMHA staff at this time.

6.0(b)9: Pet Revisions Since Submission of Previous 5 Year and Annual Plan

PMHA continues to support and implement Fair Housing regulations and requirements concerning assistance and service animals in public and managed housing. There have been no changes to the pet policy of the agency since the prior submission.

In summary, PMHA does require that all pets be maintained by their owners in a manner that promotes safety and a positive neighborhood environment. The agency requires prior approval of the pet and documentation of proper licensure and immunization. There are breed, height and weight restrictions on the animals. Pet deposits can be paid in increments to allow affordability to the owner.

6.0(b)10: Civil Rights Certification Revisions Since Submission of Previous 5 Year and Annual Plan.

While PMHA has not changed or adjusted Civil Rights Compliance policies or procedures, we have increased our goal of increased Fair Housing education for our staff, housing managers, and community housing personnel. PMHA employees are required to read each edition of the Fair Housing Advisor, initialing each reading. Fair Housing training

and discussion is part of each staff meeting, and special meetings of the staff are held to review information received in training outside of the office as well as to discuss situations that the staff feels may become an issue. During Fair Housing Month, sessions were held with each department to review Fair Housing procedure specific to that department. Legal advice from the agency's Fair Housing attorney, William Willis is sought whenever additional guidance is needed. Mr. Willis conducted a conversational Question and Answer Fair Housing Roundtable discussion with the PMHA office staff on June 27, 2011, and conducted agency-wide training on August 24, 2011. This training included not only agency staff, but also the housing and administrative staffs of the local community action agency (PICCA), as well as the Fair Housing Coordinator and Planning and Development Director of Pickaway County. In order to receive the guidance of all program sources, the Executive Director viewed a Rural Development sponsored Civil Rights training Webnair on Thursday, June 9, 2011. Pickaway MHA joined with the Chillicothe MHA to sponsor a HCV Landlord Informational session held in Chillicothe, Ohio on September 14, 2011. The Session included training on Fair Housing requirements and guidance for HCV Landlords, and was conducted by Tamra Lowe, Fair Housing Representative for the City of Chillicothe.

6.0(b)11: Fiscal Year Audit for 2010

The PMHA audit was submitted to the Auditor of State by Auditing Firm Balestra, Harr & Scherer in June, 2011. A June 23, 2011 email confirmed receipt of the submission and requires no modifications. HUD has also received and approved the submission. Additionally, PMHA was recently notified that State Auditor David Yost has bestowed an Auditor of State Award on PMHA for a "clean" audit report. Clean Audits are those who do not contain findings for recovery, material citations, material weaknesses, significant deficiencies, single audit findings or any questioned costs. A copy of the Audit is included with this submission.

6.0(b)12: Asset Management

The Pickaway MHA is not subject to asset management regulation. There have been no revisions to this section of the plan since the previous submission.

6.0(b)13: Violence Against Women Act

There have been no specific changes to VAWA policy, but the agency has worked closely with victims and victim advocates to inform and remind the program participants of their protections under VAWA.

In summary, the agency notifies all participants during intake briefings of the rights afforded by VAWA. These rights are discussed again when PMHA staff is aware of domestic violence incidents or issues that could threaten housing of the household. PMHA asks all program applicants attending briefings to sign a statement acknowledging that, "VAWA prohibits the eviction of and removal of assistance from certain persons living in public or subsidized housing if the asserted grounds for such action is an instance of domestic violence, dating violence, sexual assault or stalking. This is to prevent victims' families from losing their HUD-assisted housing as a consequence of the abuse of which they were the victim." The statement further states, "I understand that if I feel I need this protection I must sign a written request for tenant certification of status as a victim of domestic violence, dating violence, or stalking." The statement

then informs the resident of procedures to obtain the form and how to contact PMHA if assistance is required.

PMHA staff is required to train every 12-18 months on program compliance and Management and Occupancy. VAWA requirements are included in these trainings.

As stated previously, PMHA works closely with the local Domestic Violence Task Force and Women's Shelter, Haven House. PMHA reserves 8 vouchers annually for Haven House Domestic Violence use, and 22 vouchers annually for Family Unification which includes families subjected to domestic violence. Several PMHA staff and Board members are volunteers working on behalf of fund-raising for the financial support of Haven House. PMHA staff members actively refer program participants to both Scioto Paint Valley Mental Health and Southeastern Ohio Legal Aid for additional guidance on domestic violence and other issues.

EIV POLICY
Revised September, 2011

EIV POLICY & PROCEDURE

The Information in the **Enterprise Income Verification (EIV)** contains the Social Security Numbers (SSNs), full dates of birth, first and last names, and physical address of tenant families. This is all sensitive information that must not be handled carelessly. Therefore, the Pickaway Metropolitan Housing Authority realizes that it must be careful not to share this information with anyone who does not have proper authorization.

Per the implementation of Notices: H2010-10 and H2011-21, the following is incorporated into the Pickaway MHA EIV Policy & Procedure document for Multifamily Properties, the Public Housing Admission and Continuing Occupancy Policy and the Housing Choice Voucher Administrative Plan. (Note: whenever the words Owner/Agent appear in the notice, PMHA has been inserted into the Policy. PMHA serves as the Agent for the Ownership of properties Pickaway Terrace, Eden Place and Louise Terrace and is the Administering Agency for the Pickaway Housing Choice Voucher and Public Housing Programs).

Tenant Selection Plan Requirements

PMHA must use the Existing Tenant Search in the EIV system as part of the screen criteria for new tenants and will include written policies for using the search in their Tenant Selection Plan.

Policies and Procedures

PMHA must have written policies and procedures for staff to follow for using the EIV Income Report as third party verification of employment and income and for using the other EIV reports, such as Income Discrepancy Report and the EIV Verification Reports.

Consent for the Release of Information

Applicants: The Multi-Family form HUD-9887, Notice and Consent for the Release of Information and the Housing Choice Voucher and Public Housing Form HUD-9886, Authorization for Release of Information and Privacy Act Notices, signed by the applicant and each applicant family member 18 years of age and older does not need to be on file in order to use the Existing Tenant Search in EIV at the time of application processing and tenant screening.

Tenants: Form HUD-9887 and HUD-9886 authorizes HUD, Owners and Agents and PHAs to:

- 1) Use data obtained through computer matching with another agency for verifying the individual's income used for establishing the eligibility for and level of benefits under HUD's assisted housing programs.
- 2) Request wage, new hire (W-4) and unemployment claim information from current or former employers to verify information obtained through computer matching.

A current form HUD-9887 or HUD-9886 must be on file before accessing the employment or income data contained in EIV for a tenant. The form must be signed and dated by:

- 1) Each adult member of a household regardless of whether he or she has income
- 2) The head of household, spouse, or co-head, regardless of age, and each family member who is 18 years of age or older must sign and date the form at move-in, at initial (when tenant begins receiving a subsidized rent) certification and annual recertification.
- 3) A family member when he/she turns 18. In order to accommodate the tenant family, PMHA will obtain the signature of all 17 year old household members at the time of the Annual Recertification in anticipation of that individual turning 18 years of age in the coming twelve months. The Program Coordinator will add this individual to a tickler file and will check all relevant EIV reports within 90 days of the individual turning 18 years of age.

The form is valid for 15 months from the date of signature.

For Multifamily Programs, in addition to the form HUD-9887, a signed and dated form HUD-9887-A,

Applicant's/Tenant's Consent to the Release of Information, must also be on file. This form authorizes the PMHA to request information about the tenant from a third party source.

The form HUD-9886 or 9887 is not required for accessing the Verification Reports.

Forms HUD-9886 and HUD-9887 and HUD-9887-A limit the PMHA from requesting information about a tenant to "within the last five years when the tenant received assistance."

If a tenant turns 18 and has not signed forms HUD-9886 or HUD-9887, the PMHA must not use the EIV Income Reports for that tenant until the form is signed. If the tenant fails to sign the consent form(s) as noted in the property Policy & Procedures Manual, the household is in non-compliance with their lease and assistance to, and the tenancy of, the household may be terminated.

Consent to Disclose an Individual's Information to Another Person or Entity

The Federal Privacy Act prohibits the disclosure of an individual's information to another person without the written consent of such individual. As such, the EIV data of an adult household member may not be shared (or a copy provided or displayed) with another adult household member of a person assisting the tenant with the recertification process, unless the individual has provided written consent to disclose such information.

PMHA is not prohibited from discussing with the head of household and showing the head of household how the household's income and rent were determined based on the total income reported and verified.

Tenant Notification of Recertification

PMHA is required to provide reminder notices to tenants informing them of their responsibility to provide the PMHA with information about changes in family income or composition that are necessary to properly complete an annual recertification. The notification must be in writing and must include a list of information that tenants are required to bring with them to their recertification interview. This list must include documentation needed to support the income they are receiving as well as documentation to support any

deductions they may be eligible to receive. For example, elderly and disabled tenants should be requested to bring in information related to Social Security benefits and medical expenses, and tenants who are working should be requested to bring in documentation to support the income they are currently receiving.

Tenant Does Not Provide Requested Information or Information Not Acceptable

If the tenant does not provide requested information either because they do not have the requested information or they refuse to provide the information, PMHA must obtain verification of the information from the third party source.

PMHA should remind the tenant that he/she is required to supply, if available, any information requested for use in a regularly scheduled recertification (annual or interim) of income and family composition.

PMHA may determine that the tenant is not in compliance with program requirements and terminate assistance or tenancy, if the tenant fails to provide the requested information in the timeframe established by PMHA.

PMHA is also required to request third party verification from the source when the tenant disputes the EIV information.

PMHA may reject any tenant-provided documentation, if they deem the information to be unacceptable.

Reasons the documentation may be rejected:

- 1) the document is not an original document, or
- 2) the original document has been altered, or is not legible, or
- 3) the document appears to be a forged document (is not authentic)

Independent Third Party Verification

PMHA will obtain independent third party verification from the source which is used to complement EIV data when:

- 1) the tenant is unable to provide acceptable and current employment and/or income documentation to support the wage and unemployment income in EIV;
- 2) the tenant disputes the EIV income information
- 3) there is an EIV income discrepancy reported at the time of recertification (annual or interim) or at other times as specified in the PMHA policies and procedures
- 4) there is incomplete EIV employment or income data for a tenant and the PMHA needs additional information. Examples of additional information include but are not limited to:
 - A) Effective date of income (i.e. employment, unemployment compensation, or Social Security benefits)
 - B) For new employment: pay rate, number of hours worked per week, pay frequency, hire date (not required to be reported to state so it may not be in EIV), etc.
 - C) Confirmation of change in circumstances (i.e., reduced hours, reduced rate of pay, temporary leave of absence, etc), and
- 5) There is no EIV employment or income data for a tenant.

When PMHA is unable to obtain third party verification, such as, the third party does not respond, the tenant file must contain documentation as to why third party verification was not available.

PMHA may accept self-certification from the tenant only if third party verification cannot be attained.

PMHA has the discretion to obtain additional third party verification of income or verification of other EIV data based on circumstances encountered during the recertification process.

EIV Income is Incorrect or Does Not Belong to the Tenant

There may be times when the source or originator of EIV information makes an error when submitting or reporting information about tenants. Only the originator of the data can correct the information. When the

data is corrected by the source or the originator, HUD will obtain the updated information with its next computer matching process. The following procedures are regarding incorrect EIV information:

- 1) TRACS data reported in EIV originates from the PMHA. Once data is corrected in PMHA's software, the corrected data must be transmitted to TRACS
- 2) Employment and wage information reported in EIV originates from the employer. The employer reports this information to the local State Workforce Agency (SWA), who in turn, reports the information to HHS' NDNH database.

If the tenant disputes the accuracy of the information in EIV that was provided by the employer and after additional third party verification is obtained by PMHA it is determined that the information is not accurate, the tenant should contact the employer directly, in writing, to dispute the employment and/or wage information and request that the employer correct erroneous information. The tenant should provide PMHA with a copy of this written correspondence to maintain in the tenant file.

- 3) Unemployment benefit information reported in EIV originates from the local SWA. If the tenant disputes the accuracy of the information in EIV that was provided by the SWA and after additional third party verification is obtained by PMHA it is determined that the information is not accurate, the tenant should contact the SWA directly, in writing, to dispute the unemployment benefit information, and request that the SWA correct erroneous information. The tenant should provide PMHA with a copy of this written correspondence to maintain in the tenant file.

- 4) SS and SSI benefit information reported in EIV originates from the SSA. If the tenant disputes the accuracy of the information in EIV that was provided by the SSA and after additional third party verification is obtained by PMHA it is determined that the information is not accurate, the tenant should contact the SSA at (800) 772-1213, or visit the local SSA office and request that the erroneous information be corrected. SSA office information is available in the government pages of the local telephone director or online at <http://www.socialsecurity.gov>.

- 5) Identity Theft: Incorrect information in EIV may be a sign of identity theft. Sometimes someone else may use an individual's SSN, either on purpose or by accident. SSA does not require an individual to report a lost or stolen SSN card, and reporting a lost or stolen SSN card to SSA will not prevent the misuse of an individual's SSN. A person using an individual's SSN can get other personal information about that individual and apply

for credit in that individual's name.

Using EIV Reports

PMHA will use the EIV system in its entirety. In doing so, PMHA will use the:

- EIV Income Report as a third party source to verify a tenant's employment and income during mandatory recertification (annual and interim) of family composition and income, and
- Other EIV income reports (Income Discrepancy Report, New Hires Report, and No Income Report) to identify issues or discrepancies which may impact a family's assistance, and
- EIV Verification Reports (Existing Tenant Search, Multiple Subsidy Report, Identity Verification Reports, and Deceased Tenants Report) that further assist in reducing subsidy payment errors.

Income Reports

When selecting the Income Report for an individual tenant, either from the list of tenants for a particular project and/or contract or by querying by the head of household's SSN, there are three reports that must be used at the time of recertification (annual and interim). The reports can be accessed by clicking on the tab for a particular report. The three reports are the Summary Report, the Income Report and the Income Discrepancy Report.

Summary Report

This report provides a summary of information taken from the current, active certifications contained in the TRACS file at the time of the income match. It also provides the Identity Verification Status for each household member. There are four verification statuses identified:

- (1) Verified - personal identifiers (last name, DOB, SSN) match the SSA database
- (2) Failed - personal identifiers do not match the SSA database
- (3) Not Verified - personal identifiers have not yet been sent by HUD to SSA for validation or the validation is in process by SSA

- (4) Deceased - SSA's records indicate the person is deceased

PMHA will use this report at the time of recertification to review and resolve the status of any household member(s) with a "failed" or "deceased" status, and as verification that a tenant's SSN has been "verified" by SSA as being a valid SSN. PMHA does not have to do anything at the time of recertification when the status is "not verified". However, PMHA will check the Failed SSA Identity Test report monthly as changes in the Identity Verification Status for these tenants may occur.

PMHA will retain in the tenant file:

- (1) The Summary Reports as verification of the SSN for all household members whose Identity Verification Status is "Verified". If the Summary Report in the tenant file shows an Identity Verification Status of "Verified" for all household members required to have a SSN, PMHA does not have to continue to print out the Summary Report at recertification unless there is a change in household composition or in a household member's identity verification status.

To minimize the risk of exposing a tenant's SSN, PMHA may remove and destroy, at the time of recertification, copies of verification documentation received from the tenant at the time of disclosure of their SSN once the Identity Verification Status shows "Verified". PMHA will minimize the number of tenant records that contain documents that display the full nine-digit SSN. PMHA will not include the full nine-digit SSN for a tenant in emails or other electronic communications.

- (2) Any correspondence or documentation received to resolve the "Failed" or "Deceased" status.
- (3) Documentation for household members not required to disclose and provide verification of a SSN. Those who are exempt from SSN disclosure and verification requirements are those who were 62 years of age or older as of January 31, 2010, and whose initial determination of eligibility was begun before

January 31, 2010, and individuals who do not contend eligible immigration status. These individuals will continue to have a TRACS generated identification number in the SSN field. No employment or income information will be provided in EIV for these individuals, therefore, third party verification from the income source will have to be obtained.

Income Report

PMHA will use the Income Report at the time of recertification (annual and interim) of family composition and income and may use it at other times as indicated in their policies and procedures.

The Income Report:

- Provides employment and income information reported in the NDNH and SSA databases for each household member who passes the SSA identity test
- Identifies household members who may be receiving multiple subsidies by displaying the following message: "This member may be receiving multiple subsidies. See the Multiple Subsidy Tenant Report for details."

Components of the Income Report include:

(1) The Income Report provides a variety of information about each member of a household. The components of the report are:

- TRACS certification information and tenant personal identifiers
- Employment Information
- Wages
- Unemployment Benefits
- Social Security Benefits
- Dual Entitlement
- Medicare Data
- Supplemental Security Income Benefits

- SSA Disability Status

(2) The Income Report does not include other income the household may receive such as welfare benefits, most pensions, child support, etc. It should also be noted that a tenant may have wages that the employer did not report to the SWA and therefore these wages will not be contained in the NDNH database.

Required Documentation to Demonstrate EIV Compliance:

The following documentation is required to be in the tenant file to demonstrate PMHA's compliance with mandated use of EIV as the third party source to verify tenant employment and income information:

- (1) No Dispute of EIV Information: EIV Income Report, current acceptable tenant-provided documentation, and, if necessary (as determined by PMHA), third party verification from the source.
- (2) Disputed EIV Information: EIV Income Report and third party verification from the source for the disputed information
- (3) Tenant-reported income not verified through the EIV System: EIV Income Report, current acceptable tenant-provided documents and/or third party verification from the source.

NDNH (New Hires (W-4), Wage and Unemployment Compensation):

- (1) The Income report identifying the NDNH employment, wage and unemployment income information in EIV must be used as third party verification of the tenant's employment and is **not** to be used to calculate the tenant's income.
- (2) PMHA will print the Income Report and use the report as third party verification of the tenant's employment and/or unemployment
- (3) PMHA will confirm with the tenant that the employment and/or unemployment information in EIV is correct. If the tenant agrees that the employment and/or unemployment information in EIV is correct, PMHA will:
 - (a) Request the tenant to provide documentation, e.g., four current, consecutive Check stubs that will support his/her current income being received.
 - (b) Use the tenant provided documentation for determining the tenant's income

unless additional information is needed or PMHA has reason to reject the tenant provided documentation. In these instances, third party verification must be obtained from the income source.

- (c) Annualize the tenant's income using the current income projected forward for the next 12 months.
- (d) Make copies of any tenant provided documents for the tenant file and return the originals to the tenant.
- (e) Retain the printed report and supporting documentation in the tenant file along with the applicable form HUD-50059 (MF) or HUD-50058 (HCV/PH).
- (f) If the tenant disputes the employment, wage or unemployment information in EIV or when the tenant reports he/she is employed or receiving unemployment but there is not information in EIV, PMHA will obtain third party verification from the employer or SWA.

Social Security Benefits:

- (1) The Income Report identifying the Social Security benefit information in EIV must be used as third party verification of the tenant's income and will be used to calculate the tenant's income. A copy of the award or benefit letter or Proof of Income Letter is **not** required unless the tenant disputes the SSA information in EIV.
- (2) PMHA will print the Income Report and use the report as third party verification.
- (3) PMHA will confirm with the tenant that the current benefit amount in EIV is correct. If the tenant agrees that the Social Security benefit information reported in EIV is correct, PMHA will:
 - (a) Use the gross benefit amount reported in EIV for calculating the tenant's income by annualizing the gross benefit amount projected forward for the next 12 months.
 - (b) Include the Medicare premium in the medical expense deduction calculation if the premium is being paid by the tenant. If the Medicare premium is being paid by the tenant, the amount of the premium is listed under "Premium" and an

"N" is in the "Buy-in" column of the Medicare Data section of the Income Report.

(c) When the Medicare premium is being paid by the state or another entity, there is a "Y" in the buy-in column and the date when the third party started paying the tenant's Medicare premium is included in the "Buy-in Start" column of the Medicare Data section of the Income Report.

(d) When the state or another entity stops paying the tenant's Medicare premium, there will be a date in the "Buy-in Stop" column of the Medicare Data section of the Income Report. Note: The "Y" indicator in the buy-in column is information received from SSA and is not always accurate. If the tenant disputes the EIV data and PMHA verifies that the tenant is paying the Medicare premium themselves, then the tenant file must be documented with this additional information and PMHA will include the Medicare premium in the tenant's medical expense deduction.

(e) Make copies of any tenant provided documents for the tenant file and return the originals to the tenant.

(f) Retain the printed report in the tenant file along with the applicable form HUD-50059 (MF) or HUD-50058 (HCV/PH).

(4) If the tenant disputes the SSA information in EIV or when the tenant reports he/she receives SSA benefits but there is no SSA information in EIV, the PMHA will obtain third party verification by requesting the tenant provide a copy of their benefit or award letter or Proof of Income Letter, dated within the last 120 days from the date of receipt by the owner.

PMHA will not send the tenant to the SSA office if they do not have this information. Instead PMHA will ask the tenant to request benefit information from SSA using SSA's website or toll-free number:

(a) PMHA may assist the tenant in requesting benefit information from SSA, if the tenant requests their assistance in accessing the SSA website or has questions on completing the request. To request a Proof of Income Letter from SSA's website go to <http://www.socialsecurity.gov>. From the left side bar:

- Select "What you can do online"
- Select "If you get benefits"
- Select "Request a Proof of Income Letter"

Tenants should check the box "All Benefit Information Available" to make sure all benefits received are provided.

(b) To request a Proof of Income Letter from SSA's toll-free number call 1-800-772-1213.

(c) This information is free and the tenant should receive the letter in the mail within 10 days. The tenant will provide the Proof of Income Letter to PMHA for use in calculating their income. A copy of the letter will be retained in the tenant's file and the original returned to the tenant for their records.

(5) While the SSA provides information on Medicare premiums it does not provide as part of the computer matching, information on additional deductions such as Medicare Part D (prescription drugs) premiums or garnishments. Therefore, PMHA needs to request that tenants disclose any deductions they may have from their SSA benefits. For example, if the tenant is paying his/her Medicare premium and the difference between the gross and net SS benefits exceeds the amount of the Medicare premium, PMHA will discuss this with the tenant to determine any deductions, that may impact the tenant's income or allowable expenses, such as Medicare Part D (prescription drugs) premiums are an allowable medical expense.

(6) The SSA Disability Status is not always accurate, therefore, it must not be used for determining an applicant's or tenant's eligibility as disabled for a HUD program or for receiving the elderly/disabled household allowance.

(7) If PMHA finds it necessary to use some other alternative form of verification, such as bank statements, it may be necessary to use more than one document as third party verification. Documents such as bank statements only disclose the net amount of Social Security received and not the gross amount used for determining the tenant's annual income. This information will not support allowing inclusion of the Medicare premium as a medical expense if the tenant claims he/she is paying the Medicare premium. When alternative forms of verification are used, PMHA must document the tenant's file why third party verification was not obtained.

New Admissions:

For all new admissions, PMHA will:

- (1) Review the Income Report within 90 days after transmission of the move-in certification to TRACS to confirm/validate the income reported by the household.
- (2) Resolve any income discrepancies with the household within 30 days of the Income Report date
- (3) Print and retain the Income Report in the tenant file along with any documentation received to resolve income discrepancies, if applicable.

Applicants:

EIV only contains employment and income information for tenants participating in rental assistance programs. Therefore, PMHA will request third party verification from the income source for determining the applicant's income for eligibility and rent calculation purposes.

Income Discrepancy Report

The Income Discrepancy Report identifies households where there is a difference of \$2,400 or more annually in the wages, unemployment compensation and/or Social Security benefit income reported by NDNH and SSA and the wages, unemployment compensation and/or Social Security benefit income reported in TRACS (from the form HUD-50059(MF) or HUD-50058 (HCV/PH) in effect at the time of the computer match) for the period of income (POI) used for the discrepancy analysis.

The report identifies tenants whose income may have been under-or over-reported. Negative numbers on the report represent potential tenant under reporting of income while a positive number represents a potential decrease in a tenant's income. In either case, PMHA will investigate all discrepancies identified to determine whether or not they are valid. Improper payments include payments for the incorrect amount; both overpayments and underpayments.

Wage, unemployment and Social Security income in TRACS includes:

<u>TRACS INCOME CODE</u>	<u>TYPE OF INCOME</u>
B	Business
F	Federal Wage
M	Military Pay
W	Nonfederal Wage
U	Unemployment
SS	Social Security
SSI	Supplemental Security Income

Other income the household receives such as welfare benefits, most pensions, child support, etc. may be reported in annual income in TRACS but it is not used for the discrepancy analysis in EIV.

The Income Discrepancy Report is a tool to alert PMHA that there may be a discrepancy in the income reported by the tenant during the period of income shown on the report. PMHA will investigate all discrepancies identified on the report to determine whether or not the discrepancy is valid. PMHA is not expected to reconcile dollar amounts to the penny when resolving discrepancies.

PMHA will:

- (1) Print the Income Discrepancy Report at the same time they print the Income report, at annual and interim recertification or at other times as indicated in their policies and procedures. It is important that the Income Discrepancy Report be printed at the same time as the Income Report as each week a completely new report is generated based on the current information in the system for a tenant. The old report is overwritten with the current data.
- (2) Review and resolve any discrepancies in the income reported on the Income Discrepancy Report with the household at the time of recertification or within 30 days of the EIV Income Report date. Any unreporting, underreporting or over-reporting of income by the tenant and reported on current or historical form

HUD-50059s (MF) or HUD-50058 (HCV/PH) must be identified.

(3) Retain the Income Discrepancy Report along with detailed information on the resolution of the reported discrepancy in the tenant file. This includes information on resolution of the discrepancy regardless of whether the discrepancy was found to be valid or invalid.

(4) Make sure that the information in TRACS agrees with the information on the form HUD-50059 (MF) or HUD-50058 (HCV/PH) in the tenant's file. Any discrepant information **must** be corrected in the TRACS database. This is important since the income discrepancies reported in EIV are determined by comparing the wage, unemployment and Social Security benefits income reported by NDNH and/or SSA with the wage, unemployment and Social Security benefits income reported by the household and transmitted to TRACS.

PMHA will follow the instructions on Investigating and Resolving Income Discrepancies. Note: HUD regulation prohibits Owners/Agents from taking adverse action based solely on EIV information.

Other EIV Reports

EIV contains the following stand-alone reports that identify potential issues which may impact the family's assistance. PMHA must use these reports as discussed below and at other times as established in policies and procedures to reduce subsidy payment errors. PMHA will retain a "Master" file that contains a copy of the report and documentation and/or notations as indicated in the following report discussions. Because detailed reports must contain information for the members of that household only, PMHA will separate the reports that print without page breaks so that the sanctity of the individual household is not compromised.

Additional Income Reports

There are two additional income reports that PMHA will use: the No Income Report and the New Hires Report. These reports are accessed from the Monthly Summary Report when querying by project number and/or contract number. If the report name is underlined, this indicates it is an active link. PMHA will click on the report name to obtain data about households identified where no income was reported or where a

household member is reporting as having new employment.

(a) The No Income Report is a tool for PMHA to use to identify tenants who passed the identity match against SSA's records but no employment or income information was received from the match against either the SSA or NDNH records. PMHA will use this report only as identified in the policies and procedures. Because no income was reported as a result of the match against SSA and NDNH records does not mean that the tenant(s) does not have income. PMHA will make sure that, at the time of recertification interviews, proper questions are asked so that the tenants are given the opportunity to disclose any income they receive. PMHA is not required to retain copies of this report.

(b) The New Hires Report identifies tenants who have started new jobs within the last six months. The information in this report is updated monthly. PMHA will use this report at least quarterly to determine if any of their tenants have started new employment whereby the tenant has not reported a change in income to PMHA between recertifications and/or the new employment was not reported at the time of recertification. Because tenants participating in a Multifamily rental assistance program are required to report changes in income when the household's income cumulatively increases by \$200 or more per month, and because tenants participating in Public Housing and Housing Choice Voucher programs are required to report changes in income when the household's income cumulatively increases by 25% or more, PMHA will reach out to tenants to report the income changes so that rent adjustments can be made in a timely manner, thus eliminating/reducing the amount of retroactive rent repayments. PMHA will:

- (1) contact the tenant regarding his/her new employment
- (2) confirm with the tenant that they have a new job and that the employment information in EIV is correct. If the tenant agrees that the employment information in EIV is correct, PMHA will request the tenant provide documents such as four current, consecutive pay stubs, employment confirmation letter specifying date of hire, rate of pay, number of hours worked each week, pay frequency, for use in determining the tenant's income or, if necessary, request third party verification from the employer. If the tenant disputes the employment information in EIV, the PMHA will obtain third party verification from the employer.
- (3) Process a recertification in accordance with program requirements that includes the employment income
- (4) Retain the New Hires Summary Report in a master "New Hires Report" file along with notations as to the outcome of the contract with the tenant (such as J. Jones - interim recertification processed to include income

from new employment). A copy of the New Hires Detail Report for the tenant along with any correspondence with the tenant, third party verifications, etc. must be retained in the tenant file.

Verification Reports

The Verifications Reports will be accessed from the EIV Homepage, left sidebar.

(a) This report identifies applicants applying for assisted housing that may be receiving rental assistance at the time of application processing at another location. PMHA will:

(1) use this report at the time they are processing an applicant for admission to determine if the applicant or any applicant household members are currently being assisted at another Multifamily Housing or Public and Indian Housing (PIH) location.

(2) discuss with the applicant if the report identifies that the applicant or a member of the applicant's household is residing at another location, giving the applicant the opportunity to explain any circumstances relative to his/her being assisted at another location. This may be a case where the applicant wants to move from his/her present location or where two assisted families share custody of a minor child

(3) Follow up with the respective PHA or Owner/Agent to confirm the individual's program participation status before admission, if necessary, depending on the outcome of the discussion with the applicant. The report gives PMHA the ability to coordinate move-out and move-in dates with the PHA or Owner/Agent of the property at the other location.

(4) Retain the search results with the applicant along with any documentation obtained as a result of contacts with the applicant and the PHA and/or Owner/Agent at the other location.

Multiple Subsidy Report

This report identifies individuals who may be receiving multiple rental subsidies. PMHA will:

(1) Use the Multiple Subsidy Report at least quarterly to identify any tenants who are being assisted at another location. PMHA will follow up with tenants identified on the report where the discrepancy was not identified and resolved at the time of recertification.

(2) Perform both of the following search options shown below to determine if possible multiple subsidies exist:

- Search within MF
- Search within PIH

(3) Discuss with the tenant if the results of either of the searches shows that a tenant is being assisted at another location. The tenant must be given the opportunity to explain any circumstances relative to his/her being assisted at another location.

(4) Follow up with the respective PHA or Owner/Agent, if necessary, to confirm that the tenant is being assisted at the other location. Depending on the results of this investigation, the PMHA may need to take action to terminate the tenant's assistance or tenancy.

(5) Print out and retain a copy of the Multiple Subsidy Summary Report in a master "Multiple Subsidy Report" file along with the notations as to the outcome of contacts with the tenant and or PHA or Owner (such as J. Jones - no multiple subsidies being paid. A copy of the Multiple Subsidy Detail Report for the tenant plus any documentation supporting any contacts made or information obtained to determine if a household and/or household member is receiving multiple subsidies as well as documentation to support any action taken if a household and/or a household member is receiving multiple subsidies must be retained in the tenant file.

— Notes: If a tenant's multiple subsidies were discussed and resolved at the time of recertification, this must be noted on the printed Multiple Subsidy Summary Report and no further action is required.

Identity Verification Reports

There are two reports that can be accessed from the Identity Verification Report link. PMHA will use both of these reports monthly to clear up any invalid, discrepant or missing information in the TRACS database that was not identified and corrected at the time of recertification. There will not be any employment or income information in EIV for tenants who fail either the EIV pre-screening or SSA identity test so it is essential that any discrepancies are corrected within 30 days from the date of the reports. PMHA will conduct third party verifications to obtain employment and income data for these tenants.

If the report name is underlined, this indicates it is an active link. PMHA will click on the report name to

obtain data about household members who failed the EIV pre-screening or SSA identity test.

(1) Failed EIV Pre-Screening Report

This report identifies tenants who fail the EIV pre-screening test because of invalid or missing personal identifiers (SSN, last name or DOB). The tenants on this list will not be sent to SSA from EIV for the SSA identity match until the personal identifier information is corrected in TRACS.

PMHA will:

(a) Use this report monthly to identify tenants that did not pass the pre-screening test and the reason(s) they did not pass so that the errors can be corrected. PMHA will follow up with tenants identified on the report where discrepant personal identifiers were not corrected at the time of recertification.

(b) Before contacting the tenant, confirm accuracy of data entry in TRACS, (such as has a number been transposed when entering the SSN?)

(c) Confirm with the affected tenant their SSN, DOB and/or last name

(d) Obtain documentation from the tenant to verify any discrepant personal identifiers

(e) Correct any discrepant information in the TRACS system

(f) Print and retain a copy of the report in a master "Failed EIV Pre-Screening Report" file. The report will be documented with action taken to resolve invalid or discrepant personal identifiers.

Note: This report will include those persons who are exempt from the SSN disclosure and verification requirements. In these instances PMHA will note on the copy of the report retained in the "Failed EIV Pre-Screening Report" master file that the tenant(s) is exempt from SSN requirements. Exempt from SSN disclosure and verification requirements are:

- Tenants who were 62 years of age or older as of January 31, 2010, and whose initial determination of eligibility was begun before January 31, 2010, and
- Individuals who do not contend eligible immigration status

These individuals/tenants will continue to have a TRACS generated identification number in the SSN field. No employment or income information will be provided in EIV for these individuals.

(2) Failed Verification Report (Failed the SSA Identity Test)

This report identifies household members who failed the SSA identity test because their personal identifiers

(SSN, last name or DOB) do not match SSA's records as well as identifies deceased household members.

PMHA will:

- (a) Use this report monthly to identify those tenants that did not pass the SSA identity verification test and the reason(s) they did not pass so that the errors can be corrected. PMHA will follow up with tenants identified on the report where discrepant personal identifiers were not corrected at the time of recertification.
- (b) Before contacting the tenant, confirm accuracy of data entry in TRACS (such as, has a number been transposed when entering the SSN?)
- (c) Confirm with the affected tenant their SSN, DOB and/or last name
- (d) Obtain documentation from the tenant to verify and discrepant personal identifiers
- (e) Correct any discrepant information in the TRACS system so that the tenant will be included in the match against SSA and NDNH data
- (f) Encourage the tenant to contact the SSA to correct any inaccurate data in their databases if the personal identifiers on the form HUD-50059 MF) or HUD-50058 (HCV/PH) and in TRACS are accurate. The tenant can request SSA to correct his/her record by completing and submitting form SS-5 *Application for a Social Security Card*, to the local SSA office.
- (g) Print and retain a copy of the report in a master "Failed the SSA Identity Test" file. The report must be documented with action taken to resolve invalid or discrepant personal identifiers.

NOTE: If a tenant's information was corrected at the time of recertification but the EIV data has not yet been updated, this must be noted on the printed report and no further action is required.

Deceased Tenants Report

This report identifies tenants who are participating in a rental assistance programs who are reported by SSA as being deceased. PMHA will:

- (a) Use this report at least quarterly to identify those tenants reported by SSA as being deceased.
- (b) Confirm, in writing, with the head-of-household, next of kin or emergency contact person or entity provided by the tenant whether or not the person is deceased.
- (c) If the person is deceased:

- Update the family composition, and income and allowances, if applicable, on the form HUD-50059 (MF) or HUD-50058 (HCV/PH). The effective date of the form HUD-50059(MF) or HUD-50058 (HCV/PH) should be in accordance with the appropriate sections of the appropriate program guidebook or notice.
- In the case of a deceased single member of a household, process a Move-out using form HUD-50059-A (MF) or HUD-50058 (HCV/PH). The effective date of the form HUD-50059-A(MF) or HUD-50058 (HCV/PH) will be retroactive to the earlier of 14 days after the tenant's death or the date the unit was vacated.
Note: Single member deceased households are denoted on the report with a red asterisk (*) after the member's deceased date.
- Any overpayment of subsidy that was paid on behalf of the deceased tenant must be repaid to HUD
- Discrepant information must be corrected in the TRACS system within 30 days from the date of the report
- (d) Encourage the tenant to contact the SSA to correct any inaccurate data in their databases if the person shown as being deceased in the SSA database is not deceased
- (e) Print and retain a copy of the report in a master "Deceased Tenants Report" file. The report must be documented with action taken to resolve any discrepancies. All correspondence or action taken for a particular tenant must be retained in the tenant file. Note: If action was taken to remove the deceased tenant from the household or a move-out processed if a single member household but the EIV data has not yet been updated, this must be noted on the printed report and no further action is required.

The Deceased Tenant Report is updated every weekend. Examples are provided on pages 37 and 38 of Notice H2010-10 detailing removal of a deceased individual from a report.

Systematic Alien Verification for Entitlements (SAVE) System Access

Individuals who have approved access to the Department of Homeland Security's (DHS') SAVE system for verifying the validity of citizenship documents provided by the applicants or tenants who are not citizens and who claim eligible immigration status may access the system through EIV. The system can be accessed from the EIV Homepage, left sidebar under External Links.

Investigating and Resolving Income Discrepancies

A. Investigating Discrepancies

- (1) PMHA will investigate and confirm possible income discrepancies of \$2,400 or more as disclosed on the EIV Income Discrepancy Report. PMHA will also determine whether the income appearing on the EIV Income Discrepancy Report should be included as income and does not meet one of the income exclusions represented in HUD guidebooks. They will also investigate and confirm other possible errors that may result in over or underpayment of HUD subsidy, such as tenants reported by SSA as being deceased, tenants receiving multiple subsidies, etc.
- (2) PMHA will not suspend, terminate, reduce, make a final denial of rental assistance, or take any other adverse action against an individual based solely on the date in EIV.
- (3) When the tenant disputes the employment and income information in EIV, PMHA must independently verify the disputed information by obtaining third party verification directly from the third party source.
- (4) PMHA will notify the tenant of the results of any third party verification and request the tenant come into the office, within 10 days of notification, to discuss the results. The tenant may contest the finds in the same manner as applies to other information and findings relating to eligibility factors.
- (5) If the PMHA determines that the tenant is in non-compliance with his/her lease because he/she knowingly provided incomplete or inaccurate information, the PMHA will follow guidance in the appropriate program guidebook or HUD notices, for terminating the tenant's tenancy and for the requirements on filing a civil action against the tenant to recover improper subsidy payments.
- (6) Where fraud is suspected, the PMHA will report this to the HUD OIG Office of Investigation in the District that has jurisdiction in the state the project is located.

B. Unreported or Underreported Income

If the PMHA determines the tenant unreported or underreported his/her income, the PMHA will go back to the time the unreported or underreporting of income started, not to exceed the 5-year limitation that the tenant

was receiving assistance described on forms HUD-9886, HUD-9887 and HUD-9887-A, and calculate the difference between the amount of rent the tenant should have paid and the amount of rent the tenant was charged. PMHA will notify the tenant of any amount due and their obligation to reimburse the PMHA. A record of this calculation must be provided to the tenant and also retained in the tenant's file. Tenants with unreported income that goes back further than 5 years can be reported to the OIG for fraud.

PMHA will have the form HUD-50059(s) or HUD-50058(s) on file that was in effect during the period(s) that the tenant had unreported or underreported income, along with any supporting documentation, in order to calculate the amount the tenant must reimburse to the owner. The form HUD-50059(s) or HUD-50058(s) is the document whereby the tenant(s) certifies to the accuracy of the income included on the form. If PMHA does not have this historical information, PMHA cannot go back to the tenant for unreported or underreported income.

3. Tenant Repayment of Unreported or Underreported income

(1) **Tenant's Obligation to Reimburse:** Tenants are obligated to reimburse PMHA if they are charged less rent than required by HUD's rent formula due to underreporting or failure to report income. The tenant is required to reimburse PMHA for the difference between the rent that should have been paid and the rent that was charged.

NOTE: Tenants are not required to reimburse PMHA for undercharges caused solely by the PMHA's failure to follow HUD's procedures for computing rent or assistance payments.

(2) **Repayment Options:**

(a) Tenants can repay amounts due:

- (1) In a lump sum payment, or
- (2) By entering into a repayment agreement with PMHA, or
- (3) A combination of (1) and (2) above

(b) Tenants who do not agree to repay amounts due in accordance with 2.a.

above, will be in non-compliance with their lease agreement and may be subject to termination of tenancy.

(c) Tenants may also be required to repay funds to PMHA due to a:

- (1) Civil action taken by PMHA, or
- (2) Court action taken as a result of an OIG audit

(3) Repayment Agreements

(a) The tenant and the PMHA must both agree on the terms of the repayment agreement. The tenant may wish to consult with HUD's Housing Counseling Agency in their area to assist them in working with the PMHA to reach agreeable terms for the repayment agreement. See the Housing Counseling Agency website for a listing of agencies for each state at: <http://www.hud.gov/officers/hsg/sfh/hcc/hcs.cfm>.

(1) Monthly Payment: The tenant's monthly payment must be what the tenant can afford to pay based on the family's income. The monthly payment plus the amount of the tenant's total tenant payment (TTP) at the time of the repayment agreement is executed should not exceed 40 percent of the family's monthly adjusted income.

(2) Repayment Time Period: The time period for repayment by the tenant of the amount owed.

(b) Effective July 1, 2010, new repayment agreements must:

(1) Include the total retroactive rent amount owed, the amount of lump sum paid at time of execution of the agreement, if applicable, and the monthly payment amount.

(2) Reference the paragraphs in the lease whereby the tenant is in non-compliance and may be subject to termination of their lease.

(3) Contain a clause whereby the terms of the agreement will be renegotiated if there is a decrease or increase in the family's income of \$200 or more per month.

(4) Include a statement that the monthly retroactive rent repayment amount is in addition to the family's monthly rent payment and is payable to the PMHA.

(5) Late and missed payments constitute default of the repayment agreement and may result in termination of assistance and/or tenancy.

(6) Be signed and dated by the tenant and PMHA. The PMHA will require the Head of Household and, if applicable, the family member who had the unreported or underreported income sign the repayment agreement.

(c) PMHA must not apply a tenant's monthly rent payment towards the repayment amount owed that would result in an accumulation of late rent payments. The monthly payment due on the repayment agreement is in addition to the tenant's monthly rent payment.

(4) Disposition of Funds Received by PMHA

(a) PMHA is required to reimburse funds collected from the tenant to HUD in accordance with the requirements in the appropriate HUD Handbook or Notice.

(1) For Mutli-family properties, PMHA will be familiar with their software capability that allows for adding Miscellaneous Accounting Requests to the housing assistance payments (HAP) voucher (form HUD-52670) as the procedures vary from software to software. PMHA will consult their software documentation or software provider if assistance is required. PMHA will also use this software capability for their Public Housing and HCV programs.

(2) After verifying the tenant's income, PMHA will complete corrections to a prior certification(s) affected by the income change. PMHA must not fail to correct the prior certification(s) in an attempt to avoid having large negative adjustments appear on the HAP voucher.

(3) Voucher adjustments

(a) If the tenant is able to pay the entire amount due in one lump sum payment, no Miscellaneous Account Request is

needed.

- (b) If the tenant pays a lump sum payment and enters into a repayment agreement for the remaining amount due, the PMHA must first reverse the adjustment created by correcting the prior certification(s) less the lump sum payment by adding a PMAH initiated accounting adjustment (Owner Agent ReQuest - OARQ) Miscellaneous Accounting Request to the voucher.
- (c) Adjustments for payments received from the tenant per the repayment agreement are made as addressed in (e) below.

- (d) If the tenant is subject to a repayment agreement, the PMHA must first reverse the full amount of the voucher adjustment created by correcting the prior certification(s).

- (e) As the tenant makes payments per the repayment agreement, PMHA must enter them as negative amounts on the voucher as OARQ Miscellaneous Accounting Requests with the comment field completed explaining payment and costs retained. If the PMHA is deducting their costs from the payment received from the tenant, the OARQ Miscellaneous Accounting Request will be for the amount collected from the tenant less the PMHA's costs.

- (f) PMHA will consult the TRACS Monthly Activity Transmission (MAT) User's Guide to obtain updated instructions on Miscellaneous Accounting Requests.

- (b) PMHA may retain a portion of the repayments actually collected from the tenants who have improperly reported their income at the time of certification or recertification to help defray the cost of pursuing these cases. This is no longer limited to cases where PMHA has determined fraud.

PMHA may only retain an amount to cover their actual costs, which is the **lesser of:**

- (1) their actual cost, or
 - (2) 20% of the amount received from the tenant
- (c) Amounts retained by PMHA must be deposited into the project's operating account to offset the expenses incurred for these cases.
- (d) As with all income and expenses of the project, PMHA must keep records of the receipt and disbursement of all amounts collected from the tenant for audit purposes. At a minimum, the owner must record:
- (1) Date and amount(s) received from the tenant;
 - (2) Expenses incurred (examples include staff time for verifying the unreported income, meeting with the tenant, drafting repayment agreements, generating and sending monthly invoices to tenant, generating manual voucher adjustments, collection agency fees, if applicable, and meeting state requirements.)
 - (3) Amount(s) retained, and
 - (4) Voucher date(s) and amount(s) of reimbursement made to HUD

D. Over-reported Income

1. Tenants may report decreases in their income. In these instances, PMHA must process an interim recertification in accordance with the appropriate program Handbook or Notice.
2. If, at the time of recertification, there is an Income Discrepancy Report in EIV that reflects a decrease of \$2,400 or more in wage, unemployment and/or Social Security income reported in EIV and the wage, unemployment and/or Social Security income in TRACS for the period of income used for the discrepancy analysis, PMHA must investigate the discrepancy.
 - (a) If, after investigating the discrepancy, PMHA determines that an error was made in calculating the tenant's income, such as third party verification was not obtained, third party verification was received but an

error was made in calculating the tenant's income) and the income was over-reported, PMHA must complete corrections to the prior certification(s) affected by the income change. Once the corrections have been made, PMHA will determine the difference between the amount of rent the tenant paid and the rent that the tenant should have paid.

(b) PMHA must reimburse the tenant the amount of overpayment of rent in accordance with the appropriate Handbook or Notice.

E. Errors Discovered During a Multi-Family Monitoring Review

If during their review of the tenant files, the Contractor Administrator determines that an error was made in the income calculation based on the income verifications on file that results in an under-or over-payment of rent by the tenant, PMHA will make the necessary adjustments to the tenant's rent for the period the error occurred. This will appear as a finding on the Management and Occupancy Review (MOR) and PMHA will have 30 days to mitigate.

(a) PMHA will complete corrections to the prior certification(s) affected by the income change. Once the corrections have been made, PMHA will determine the difference between the amount of rent the tenant paid and the rent that the tenant should have paid.

(b) PMHA will follow the instructions in the appropriate handbook or notice for reimbursement to PMHA by the tenant for underpayment of rent and for reimbursement to the tenant by PMHA for overpayment of rent.

Retention of EIV Reports

PMHA will retain:

1. The Income Report, the Summary Report(s) showing Identity Verification Status as "Verified" and the Income Discrepancy Report(s) and supporting documentation must be retained in the tenant file for the term of tenancy plus three years.
2. Any tenant provided documentation, or other third party verification of income, received to supplement the SSA or NDNH data must be retained in the tenant file for the term of tenancy plus three years.
3. Results of the Existing Tenant Search must be retained with the application:

- (a) If applicant is **not** admitted, the application and search results must be retained for three years.
- (b) If applicant is admitted, the application and search results must be retained in the tenant file for the term of tenancy plus three years.
- 4. The master files for the New Hires Report, Identity Verification Reports, Multiple Subsidy Report and Deceased Tenants Report must be retained for three years.

Once the retention period has expired, PMHA will dispose of the data in a manner that will prevent any unauthorized access to personal information, such as burn, pulverize, shred, etc.

Penalties For Failure To Have Access To And/Or Use EIV for Multi-family Programs

A. PMHA will incur penalties if they:

- 1. Did not receive access to the EIV system by January 31, 2010, because they did not submit a Coordinator Access Authorization Form (CAAF) to the Multifamily Help Desk by December 15, 2009, and/or did not complete the property assignment process by January 15, 2010, as instructed in Listserve and iMAX messages posted beginning mid-November 2009;
- 2. Did not begin using EIV as of January 31, 2010, or
- 3. Are not using EIV at the time of a MOR.

PMHA will also determine that they are appropriately register to use, and are appropriately using, the EIV system for the Housing Choice Voucher and Public Housing properties.

B. Penalties

- 1. PMHA will receive a finding on the Multi-family MOR report
- 2. PMHA will incur a penalty of five percent decrease in the voucher payment for the month following the date the violation was found.
- 3. PMHA will make an adjustment on the next scheduled voucher to adjust

for the five percent decrease for Multi-Family properties

4. Will be monitored by the Contract Administrator to ensure the adjustment is made for Multi-Family properties.

C. For Multi-family properties, PMHA will have 30 days to cure the finding

1. The finding will be cured by obtaining access to and/or using EIV and the PMHA will make an adjustment to the next scheduled voucher to collect the funds previously returned to HUD.
2. If the finding is not cured during the 30 day period, both the owner and the Management agent, if applicable, will be flagged in HUD's Active Partners Performance System (APPS). Once the finding is cured, the flag(s) will be removed.

Security of EIV Data

The data in EIV contains personal information on individual tenants that is covered by the Privacy Act. The information in EIV may only be used for limited official purposes:

Official Purpose Includes:

1. PMHA, in connection with the administration of Multifamily Housing, Housing Choice Voucher and Public Housing programs, for verifying the employment and income at the time of recertification and for reducing administrative and subsidy payment errors.
2. Contract Administrators (PBCAs and TCAs) and HUD staff for monitoring and oversight of the access and mandatory use of the EIV system.
3. IPAs, when hired by an owner to perform the financial audit of the project, for use in determining the owner's compliance with verifying income and determining the accuracy of the rent and subsidy calculations.

Restrictions on disclosure requirements for IPAs:

- (a) Can only access EIV income information within hard copy files and only within the offices of the owner or management agent;

- (b) Cannot transmit or transport EIV income information in any form;
 - (c) Cannot enter EIV income information on any portable media;
 - (d) Must sign non-disclosure oaths (Rules of Behavior for Non-system Users) that the EIV income information will be used only for the purpose of the audit; and
 - (e) Cannot duplicate EIV income information or re-disclose EIV income information to any user not authorized by Section 435(j)(7) of the Social Security Act to have access to the EIV income data. NOTE: Independent public auditor means a CPA or a licensed or registered public accountant, having no business relationship with the private owner except for the performance of audit, systems work and tax preparation. If not certified, the Independent Public Accountant must have been licensed or registered by a regulatory authority of a State or other political subdivision of the United States on or before December 31, 1970. In States that do not regulate the use of the title "public accountant," only Certified Public Accountants may be used.
4. OIG investigators for auditing purposes

Official Purpose Does NOT Include:

1. Sharing the information with governmental entities not involved in the recertification process used for HUD's assisted housing programs, such as the LIHTC program and RHS Section 515 program. HUD Notice H 2010-10 and 2011-21 do not apply to the RHS Section 515 program for certification of tenants who do not receive Section 8 assistance or for compliance monitoring by RHS staff for tenants receiving Section 8 assistance. Disclosing the EIV information to PMHA for use under the RHS Section 515 programs is not allowed since neither the IRS nor RHS are a party to the computer matching agreements with HHS and SSA. The fact that there is financing through other federal agencies involved in a particular property under one of the authorized HUD programs does not then permit that federal agency to use or view information in the EIV system that is covered by the computer matching agreements. The computer matching agreements are governed by the Privacy Act and the Social Security Act.
2. Disclosure of the EIV information to Multi-family Service Coordinators even though the tenant signs a release of information consent form authorizing the Service Coordinator to have access to their file is not allowed unless the Service Coordinator is present during the interview and assisting the tenant with the recertification process. The statute authorizing the computer matching identifies those parties to whom the

information can be disclosed and the statute does not include Service Coordinators.

Disclosure to Persons Assisting Tenants with the Recertification Process:

With the written consent of the tenant, EIV data may be shared with persons assisting the tenant with the recertification process. Tenants who require assistance during the recertification process may have a representative present to assist them in their ability to participate in the recertification process; this includes review and explanation of the written third party income verifications. Disclosure of EIV information to these parties must be employment or income information pertaining only to the tenant who has provided his/her consent. These parties must not have access to EIV information for any other household members.

Parties to whom the tenant can provide written consent include:

- Service coordinators, only if they are present at and assisting the tenant with the recertification process
- Translators/Interpreters
- Individuals assisting an elderly individual or a person with a disability
- Guardians
- Powers of Attorney
- Other Family Members

Penalties for Willful Disclosure or Inspection of EIV Data:

1. Unauthorized Disclosure - Felony conviction and fine up to \$5,000 or imprisonment up to five (5) years, as well as civil damages
2. Unauthorized Inspection - Misdemeanor penalty of up to \$1,000 and/or one (1) year imprisonment, as well as civil damages

Rules of Behavior (ROB)

1. With the EIV System Access

All EIV users who have access to the EIV system must adhere to the EIV ROB signed at the time of requesting access to the EIV system

a. Instructions for requesting access to EIV for both internal HUD users and external users are posted on the Multifamily EIV website at:

<http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/eivapps.cfm>

b. External users: the signed initial and current online (unsigned) access authorization forms containing the ROB must be kept on file along with the owner approval letters. Upon request, the forms must be made available to the entity monitoring EIV compliance.

c. Internal users: a copy of the signed ROB will be kept on file by the TRACS/EIV Security Officer and a signed copy should also be retained by the EIV user.

2. Without EIV System Access

a. PMHA staff who do not have access to the EIV system but who view or use EIV data/reports provided by authorized EIV Coordinators or EIV Users in order to perform their job functions, must adhere to the EIV ROB posted on the Multifamily EIV website at:

<http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/rulesofbehavior.pdf>

The ROB must be signed and kept on file.

b. IPAs hired by the owner to perform a financial audit must adhere to the ROB posted on the Multifamily EIV website at:

<http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/rulesofbehavior.pdf>

The ROB must be signed by the IPA and kept on file.

Security Training

EIV users are required to complete online security training annually. To meet this requirement, PMHA EIV users and viewers must complete the online Federal ISS Awareness training program. At the end of the training, EIV users and viewers must print and maintain the Certificate of Completion provided. Security Awareness Training can be completed by:

- Opening the web browser

- Type <http://iase.disa.mil/eta/index.html#onlinetraining>
- Press Enter
- Click on Federal ISS Awareness icon on the 1A Education, Training and Awareness Screen
- Click on Launch New Information Systems Security Awareness on the Information Systems Security Awareness screen
- Proceed with the training
- When the training is complete, print and maintain the Certificate of Completion

The Security Awareness Training described above is the same training required for those individuals who transmit TRACS files. If the training has been completed to satisfy TRACS security training requirements, this will also satisfy EIV security training requirements as well provided the completion date represented on the Certificate of Completion is not older than one year.

EIV users authorized by owners to have access to the EIV system on their behalf must also complete the applicable online Security Awareness Training Questionnaire for Multifamily Housing Programs upon initial access to the system and annually thereafter.

2. EIV users will:
 - a. Review Section 4 on Security contained in the Multifamily EIV User Manual for Multifamily Housing Program Users posted at: <http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/usermanual.pdf>
 - b. Review the EIV Security Administration Manual posted at: <http://www.hud.gov/offices/hsg/mfh/rhiip/eiv/securityadminmanual.pdf>
 - c. View the Security training provided during the most recent EIV webcast, posted at: <http://www.hud.gov/webcasts/archives/multifamily.cfm>, and
3. PMHA staff who do not have access to EIV but who use EIV reports to perform their job function must have security training annually.

Safeguarding EIV Data

1. Technical Safeguarding of Data

- a. All individuals who have access to the EIV system must have a valid WASS User ID and password and must use this ID and password for accessing EIV. Upon receipt of the assigned WASS User ID, an individual must then apply to be approved for access to the EIV system.
- b. To assist in ensuring that only those individuals who have a need to use the EIV system to perform their job function have access to the EIV system, users must be certified to use the system
 - (1) EIV Coordinators are certified at initial access and annually thereafter
 - (2) EIV Users are certified at initial access and bi-annually thereafter

If this certification is not made, the user's EIV access is terminated

- c. A Security Awareness Training Questionnaire, which supplements required annual security training, must be completed at the time of initial access to the system and annually thereafter. The EIV system is designed to block the entry of those individuals who have not successfully completed the questionnaire, such as answered 90 percent of the questions correctly.

2. Administrative Safeguards

- a. Policies and Procedures must be established to govern the use of the EIV system.

These procedures should address:

- (1) Authorized use of the EIV system

Only those persons who are involved in certifying eligibility or who process annual or interim certifications will be authorized users of the system

- (2) How to handle security breaches

(a) Users should immediately contact their supervisor

(b) Full report will be documented on security breaches. If policies need to be revised to prevent breaches, they will be revised.

(c) A review of the written report will be compared to the EIV Policy and documentation will be further made to note where the breach occurred.

(d) *The tenant will be contacted and made aware of the breach within 48 hours of the discovery of the breach.*

(e) *The Executive Director or a designee will provide the HUD Field Office Public Housing Director with the written documentation, and*

(f) *The HUD Field Office Public Housing Director, upon receipt of the written documentation will make a determination regarding the referral and the provision of the written documentation to the Headquarters EIV Coordinator and/or EIV Security Officer for further review and follow-up action.*

(3) Destruction of EIV data

EIV data will be shredded at the appropriate time as per this policy.

b. EIV manuals and the instructions in Notice HUD 2010-10 and Notice 2011-21 should be reviewed when implementing those administrative safeguards

3. Physical Safeguards

– Physical safeguarding of EIV data refers to steps that must be taken to help ensure the data is safe when stored electronically or in hardcopy and when transmitting data electronically.

a. Storing and Transmitting of Electronic EIV Data

(1) EIV data stored electronically must be in a restricted access directory, or, if placed on portable media, labeled appropriately and encrypted using a NIST compliant vendor. Similarly, all emails containing EIV data must be encrypted using a NIST compliant vendor. A list of compliant vendors can be found at:

<http://csrc.nist.gov/groups/STM/cmvp/documents/140-1401vend.htm>

(2) The full nine-digit SSN for a tenant must not be included in emails or other electronic communications.

NOTE: The downloading of EIV data to mobile devices is not allowed for IPAs

b. Hardcopy EIV Data

EIV data that is printed out must not be left unattended. The documents should be retrieved as soon as they are printed and, if possible, use a restricted printer, copier, or facsimile machine. When faxing EIV data, ensure there is someone waiting and ready to retrieve the fax as soon as it is received (printed). When mailing EIV data, the data must be sent to an office of the PMHA. EIV data must not be mailed to Independent Public Auditor offices.

PMHA further requires that all files be kept behind closed doors for additional security. These doors are locked when PMHA is not open during working hours. During working hours, only PMHA staff members are permitted in the file rooms where files are stored.

When files are in offices, they should be kept in a file cabinet, out of public view, unless specifically being worked on by PMHA staff members.

c. Computer Security

The EIV system is set up to time out after 30 minutes of inactivity. This automatic safeguard should not be the only security measure taken. Individuals who use the EIV system should use a password protected screensaver and lock their computer when leaving their workspace. A user should not leave a computer unattended with EIV data displayed on the screen. It is also recommended that the EIV system be exited using the "X" at the top right of the screen which will remove the user from the entire WASS system. PMHA further requires that EIV computer access is not engaged unless the staff member is specifically retrieving EIV data. Upon receipt of EIV data for specific residents, the PMHA staff member will exit out of EIV and Security Systems entirely.

PMHA employees are instructed to not share passwords with any other individual, including the Executive Director or EIV Coordinator.

d. Destroying EIV data

EIV data must be destroyed as soon as it has served its purpose as prescribed by HUD's policies and

procedures and in accordance with HUD's prescribed retention period. Shredding, burning or pulverizing are all examples of acceptable ways to destroy EIV data. PMHA shreds all EIV data as per the guidelines of this policy.

TOOLS AND RESOURCES

Tools and Resources are listed on page 54 and 55 of Notice HUD 2011-21, the entire document of which is incorporated by attachment into this policy, as are all attachments and examples contained within the notice.

2010 Audit



Dave Yost • Auditor of State

June 30, 2011

Rebecca Curtis, Finance Director
Pickaway Metropolitan Housing Authority
176 Rustic Drive
Circleville, Ohio 43113

Dear Ms. Curtis:

Please be advised the enclosed letter regarding the audit of the Pickaway Metropolitan Housing Authority, Pickaway County, for the year ended December 31, 2010 was sent to your public accountant, Balestra, Harr & Scherer, CPAs, Inc.

If you have any questions or concerns, please contact me at (614) 466-3597.

Sincerely,

DAVE YOST
Auditor of State


Brad Blake
Chief Auditor, Quality Assurance



Dave Yost • Auditor of State

June 30, 2011

Brenden Balestra
Balestra, Harr & Scherer, CPAs, Inc.
800 Gallia Street, Suite 38
Portsmouth, Ohio 45662

Dear Mr. Balestra:

A desk review of the audit report has been performed for the Pickaway Metropolitan Housing Authority, Pickaway County, for the year ended December 31, 2010. Based on the desk review, this report is acceptable and requires no modifications.

We will certify this audit with the Clerk of the Bureau. If you have any questions or concerns, please contact me at (614) 466-3597.

Sincerely,

DAVE YOST
Auditor of State

A handwritten signature in cursive script that reads "Brad Blake".

Brad Blake
Chief Auditor, Quality Assurance

cc: Bill Collier, Chief Auditor
Rebecca Curtis, Finance Director, Pickaway Metropolitan Housing Authority

Pickaway Metropolitan Housing Authority

Pickaway County, Ohio

Single Audit

January 1, 2010 through December 31, 2010

Year Audited Under GAGAS: 2010



Balestra, Harr & Scherer, CPAs, Inc.

528 South West St, P.O. Box 687, Piketon, Ohio 45661 Phone: 740.289.4131 Fax: 740.289.3639
9076 Ohio River Road, Wheelersburg, OH 45694 Phone: 740.876.9121 Fax: 800.210.2573

WWW.BHSCPAS.COM

Pickaway Metropolitan Housing Authority
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For the Year Ended December 31, 2010

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Independent Auditor's Report

Pickaway Metropolitan Housing Authority
Pickaway County
176 Rustic Drive
Circleville, Ohio 43113

To the Board of Commissioners:

We have audited the accompanying financial statements of the business-type activities of the Pickaway Metropolitan Housing Authority, Pickaway County, Ohio, (the Authority), as of and for the year ended December 31, 2010, as listed in the table of contents. These financial statements are the responsibility of the Authority's management. Our responsibility is to express opinions on these financial statements based on our audit.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in the Comptroller General of the United States' *Government Auditing Standards*. Those standards require that we plan and perform the audit to reasonably assure whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the business-type activities of Pickaway Metropolitan Housing Authority, Pickaway County, Ohio, as of December 31, 2010, and the changes in financial position and cash flows, thereof for the year then ended in conformity with accounting principles generally accepted in the United States of America.

In accordance with *Government Auditing Standards*, we have also issued our report dated May 31, 2011, on our consideration of the Authority's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements and other matters. While we did not opine on the internal control over financial reporting, or on compliance, that report describes the scope of our testing of internal control over financial reporting and compliance and the results of that testing. That report is an integral part of an audit performed in accordance with *Government Auditing Standards*. You should read it in conjunction with this report in assessing the results of our audit.

Accounting principles generally accepted in the United States of America require this presentation to include Management's Discussion and Analysis, as listed in the table of contents, to supplement the basic financial statements. Although this information is not part of the basic financial statements, the Government Accounting Standards Board considers it essential for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide and assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any other assurance.

Board of Commissioners
Pickaway Metropolitan Housing Authority
Independent Auditor's Report

We conducted our audit to opine on the financial statements that collectively comprise the Authority's basic financial statements taken as a whole. The supplemental financial data is presented for additional analysis as required by the U.S. Department of Housing and Urban Development and is not part of the basic financial statements. The Schedule of Federal Awards Expenditures provides additional information required by the U.S. Office of Management and Budget Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*, and is also not a required part of the basic financial statements. The supplemental financial data and the Schedule of Federal Awards Expenditures are management's responsibility, and were derived from and related directly to the underlying accounting and other records used to prepare the basic financial statements. This supplemental financial data and the Schedule of Federal Awards Expenditures were subject to the auditing procedures we applied to the basic financial statements. We also applied certain additional procedures, including comparing and reconciling this information directly to the underlying accounting and other records used to prepare the basic financial statements or to the basic financial statements themselves, in accordance with auditing standards generally accepted in the United States of America. In our opinion, this information is fairly stated in all material respects in relation to the basic financial statements taken as a whole.



Balestra, Harr & Scherer, CPAs, Inc.
May 31, 2011

Pickaway Metropolitan Housing Authority
Management's Discussion of Analytics
For the Year Ended December 31, 2010

It is a privilege to present for you the financial picture of Pickaway Metropolitan Housing Authority. The Pickaway Metropolitan Housing Authority's ("the Authority") management's discussion and analysis is designed to (a) assist the reader in focusing on significant financial issues, (b) provide an overview of the Authority's financial activity, (c) identify changes in the Authority's financial position (its ability to address the next and subsequent year challenges), and (d) identify the single enterprise fund issues or concerns.

Since the Management's Discussion and Analysis (MD&A) is designed to focus on the current year's activities, resulting changes and currently known facts, please read it in conjunction with the Authority's financial statements.

FINANCIAL HIGHLIGHTS

- The revenue increased by \$453,961 (or 10.03%) during 2010, and was \$4,981,155 and \$4,527,194 for 2010 and 2009, respectively.
- The total expenses increased by \$189,495 (or 4.20%). Total expenses were \$4,700,108 and \$4,510,613 for 2010 and 2009, respectively.

BASIC FINANCIAL STATEMENTS

The basic financial statements are designed to be corporate-like in that all business type programs are consolidated into one single enterprise fund for the Authority.

These statements include a Statement of Net Assets, which is similar to a Balance Sheet. The Statement of Net Assets reports all financial and capital resources for the Authority. The statement is presented in the format where assets, minus liabilities, equals "Net Assets", formerly known as equity. Assets and liabilities are presented in order of liquidity, and are classified as "Current" (convertible into cash within one year), and "Non-current".

The focus of the Statement of Net Assets (the "Unrestricted Net Assets") is designed to represent the net available liquid (non-capital) assets, net of liabilities, for the entire Authority. Net Assets (formerly equity) are reported in three broad categories (as applicable):

Net Assets, Invested in Capital Assets, Net of Related Debt: This component of Net Assets consists of all Capital Assets, reduced by the outstanding balances of any bonds, mortgages, notes or other borrowings that are attributable to the acquisition, construction, or improvement of those assets.

Restricted Net Assets: This component of Net Assets consists of restricted assets, when constraints are placed on the asset by creditors (such as debt covenants), grantors, contributors, laws, regulations, etc.

Unrestricted Net Assets: Consists of Net Assets that do not meet the definition of "Net Assets Invested in Capital Assets, Net of Related Debt", or "Restricted Net Assets". This account resembles the old operating reserves account.

The basic financial statements also include a Statement of Revenues, Expenses and Changes in Fund Net Assets (similar to an Income Statement). This Statement includes Operating Revenues, such as rental income, Operating Expenses, such as administrative, utilities, and maintenance, and depreciation, and Non-Operating Revenue and Expenses, such as grant revenue, investment income and interest expense.

The focus of the Statement of Revenues, Expenses and Changes in Fund Net Assets is the "Change in Net Assets", which is similar to Net Income or Loss.

Finally, a Statement of Cash Flows is included, which discloses net cash provided by, or used for operating activities, non-capital financing activities, and from capital and related financing activities.

Pickaway Metropolitan Housing Authority
Management's Discussion of Analytics
For the Year Ended December 31, 2010

The Authority's programs that are consolidated into a single enterprise fund are as follows:

Conventional Public Housing – Under the Conventional Public Housing Program, the Authority rents units that it owns to low-income households. The Conventional Public Housing Program is operated under an Annual Contributions Contract (ACC) with HUD, and HUD provides Operating Subsidy to enable the PHA to provide the housing at a rent that is based upon 30% of adjusted gross household income.

Capital Fund Program (CFP) – This is the current primary funding source for the Authority's physical and management improvements. Funds are allocated by a formula allocation and based on size and age of the authority's units.

Williamsport Terrace (WT) – This is a multiple family housing project funded by the United States Department of Agriculture. Each month subsidy is paid to the authority and the USDA deducts the mortgage payment from that subsidy. The rental assistance part of the subsidy is reflected as federal expenditures for this program.

Other Business Activities – This is the miscellaneous activities of the authority that currently include housing activities outside the scope of the conventional and housing choice voucher programs. Management contracts for non-profit elderly projects.

Housing Choice Voucher Program – Under the Housing Choice Voucher Program, the Authority subsidizes rents to independent landlords that own the property. The Authority subsidizes the family's rent through a Housing Assistance Payment (HAP) made to the landlord. The program is administered under an Annual Contributions Contract (ACC) with HUD. HUD provides funding to enable the Authority to structure a lease that requires the participant to pay a rent based on a percentage of their adjusted gross household income, typically 30%, and the Housing Authority subsidizes the balance.

Pickaway Metropolitan Housing Authority
Management's Discussion of Analytics
For the Year Ended December 31, 2010

BASIC FINANCIAL STATEMENTS

STATEMENT OF NET ASSETS

The following table reflects the condensed Statement of Net Assets compared to prior year.

TABLE 1		<u>2010</u>	<u>2009</u>
Current and other assets		\$ 1,473,251	\$ 1,672,225
Capital assets		5,694,014	5,350,958
	TOTAL ASSETS	<u>7,167,265</u>	<u>7,023,183</u>
Current liabilities		127,788	438,731
Long-term liabilities		820,077	646,100
	TOTAL LIABILITIES	<u>947,865</u>	<u>1,084,831</u>
Net assets:			
Invested in capital assets, net of related debt		4,936,328	4,764,667
Restricted		166,138	411,749
Unrestricted		1,116,934	761,936
	TOTAL NET ASSETS	<u>\$ 6,219,400</u>	<u>\$ 5,938,352</u>

MAJOR FACTORS AFFECTING THE STATEMENT OF NET ASSETS

Current and other assets decreased \$198,974. Cash and investments represented most of the change and at the end of the prior year the authority had deferred revenue of \$280,299 for HAP and Administrative subsidy received in 2009 for 2010. This amount was spent in 2010.

The capital asset differences are outline in Table 4.

Current liabilities decreased by \$310,943, most of which was a decrease in deferred revenue of \$307,069.

The change in net assets was the 2010 activity of an increase of \$281,047. Refer to Table 2.

Pickaway Metropolitan Housing Authority
Management's Discussion of Analytics
For the Year Ended December 31, 2010

TABLE 2
STATEMENT OF REVENUES, EXPENSES AND CHANGES IN NET ASSETS

The following schedule compares the revenues and expenses for the current and previous fiscal year.

	<u>2010</u>	<u>2009</u>
Revenues		
Tenant revenue - rents and other	\$ 267,792	\$ 255,575
Operating subsidies and grants	3,975,526	3,924,371
Capital grants	698,107	293,295
Investment income/other revenues	39,730	53,953
TOTAL REVENUE	4,981,155	4,527,194
Expenses		
Administration	632,194	613,957
Tenant services	1,471	75,776
Utilities	102,855	101,013
Maintenance	337,637	295,390
General/PILOT/Insurance	48,500	52,166
Housing assistance payment	3,142,304	2,951,385
Depreciation	396,484	380,720
Interest expense	11,542	11,048
Bad debt/fraud losses	27,121	29,158
TOTAL EXPENSES	4,700,108	4,510,613
Operating transfer in	20,000	165,084
Operating transfer out	(20,000)	(165,084)
NET INCREASE (DECREASE)	\$ 281,047	\$ 16,581

MAJOR FACTORS AFFECTING THE STATEMENT OF REVENUE, EXPENSES AND CHANGES IN NET ASSETS

The significant changes in revenue occurred in the capital grants, during the year the authority had major construction for the rural rental housing program of which capital grants were received in the amount of \$612,991. The capital funds from HUD were down \$208,179, this activity fluctuates from year to year. Investment income is down due to market conditions.

The increase in total expenses is due largely to the increase in HAP expenditures in 2010, which was \$190,919.

Pickaway Metropolitan Housing Authority
Management's Discussion of Analytics
For the Year Ended December 31, 2010

CAPITAL ASSETS AND DEBT ADMINISTRATION

CAPITAL ASSETS

As of year end, the Authority had \$5,694,014 invested in a variety of capital assets as reflected in the following schedule, which represents a net increase (addition, deductions and depreciation) of \$343,057 from the end of last year.

TABLE 3
 CAPITAL ASSETS AT YEAR-END
 (NET OF DEPRECIATION)

	2010	2009
Land and land rights	\$ 684,414	\$ 684,414
Buildings	10,719,302	9,988,023
Equipment - administrative	187,701	216,157
Equipment - dwellings	117,462	99,992
Leasehold improvements	57,495	57,495
Construction in progress	-	40,926
Accumulated depreciation	(6,072,360)	(5,736,049)
TOTAL	\$ 5,694,014	\$ 5,350,958

The following reconciliation summarizes the change in Capital Assets.

TABLE 4
 CHANGE IN CAPITAL ASSETS

BEGINNING BALANCE		\$ 5,350,958
Additions		739,540
Depreciation		(396,484)
	ENDING BALANCE	\$ 5,694,014
Capital improvements on buildings amounted to:		\$ 690,353

DEBT ADMINISTRATION

The Authority's debt is listed as current and long-term debt on the statement of net assets and is a loan in the Williamsport Terrace project a FHA project. The Authority also has a construction loan to renovate a building acquired. This construction loan to be completed in 2011.

Pickaway Metropolitan Housing Authority
Management's Discussion of Analytics
For the Year Ended December 31, 2010

ECONOMIC FACTORS

Significant economic factors affecting the Authority are as follows:

- Federal funding levels of the Department of Housing and Urban Development
- Local labor supply and demand, which can affect salary and wage rates
- Local inflationary, recessionary and employment trends, which can affect resident incomes and therefore the amount of rental income
- Inflationary pressure on utility rates, supplies and other costs
- Market rates for rental housing

IN CONCLUSION

Pickaway Metropolitan Housing Authority takes great pride in its financial management and is pleased to report on consistent and sound financial condition of the Authority.

FINANCIAL CONTACT

If you have any questions regarding this report, you may contact Kim Hartinger, Executive Director of the Pickaway Metropolitan Housing Authority at (740) 477-2514.

Pickaway Metropolitan Housing Authority
Statement of Net Assets
As of December 31, 2010

ASSETS	
Current Assets	
Cash and cash equivalents	\$ 482,817
Cash-tenant security deposits	26,936
Investments - unrestricted	390,608
Receivables, net of allowance	111,160
Inventories, net	14,162
Prepaid expenses and other assets	<u>27,608</u>
Total current assets	1,053,291
Noncurrent assets	
Cash and cash equivalents - restricted	179,583
Investments - restricted	240,377
Nondepreciable capital assets	684,414
Depreciable capital assets, net of accumulated depreciation	<u>5,009,600</u>
Total noncurrent assets	<u>6,113,974</u>
TOTAL ASSETS	7,167,265
LIABILITIES	
Current liabilities	
Accounts payable	14,903
Accrued liabilities	69,991
Intergovernmental payables	12,304
Tenant security deposits	7,786
Deferred revenue	19,150
Long-term debt - current portion	6,700
Other current liabilities	<u>54</u>
Total current liabilities	130,888
Noncurrent liabilities	
Long-term debt	750,986
Noncurrent liabilities - other	13,445
Compensated absences	<u>52,546</u>
Total noncurrent liabilities	<u>816,977</u>
TOTAL LIABILITIES	<u>947,865</u>
NET ASSETS	
Invested in capital assets, net of related debt	4,936,328
Restricted net assets	166,138
Unrestricted	<u>1,116,934</u>
TOTAL NET ASSETS	<u>\$ 6,219,400</u>

The notes to the basic financial statements are an integral part of these statements.

Pickaway Metropolitan Housing Authority
Statement of Revenues, Expenses and Changes in Net Assets
For the Year Ended December 31, 2010

OPERATING REVENUES	
Tenant revenue	\$ 267,792
Government operating grants	3,975,526
Other revenues	<u>30,822</u>
TOTAL OPERATING REVENUES	4,274,140
OPERATING EXPENSES	
Administrative	632,194
Tenant services	1,471
Utilities	102,855
Maintenance	337,637
Insurance	32,671
Payment in Lieu of Taxes	12,304
General	3,525
Housing assistance payments	3,142,304
Bad Debts	27,121
Depreciation expense	<u>396,484</u>
TOTAL OPERATING EXPENSES	<u>4,688,566</u>
OPERATING LOSS	(414,426)
NON-OPERATING REVENUES/(EXPENSES)	
Capital grants	698,107
Investment income	8,908
Interest expense	<u>(11,542)</u>
TOTAL NON-OPERATING REVENUES/(EXPENSES)	<u>695,473</u>
CHANGE IN NET ASSETS	281,047
NET ASSETS BEGINNING OF YEAR	<u>5,938,353</u>
NET ASSETS END OF YEAR	<u><u>\$ 6,219,400</u></u>

The notes to the basic financial statements are an integral part of these statements.

Pickaway Metropolitan Housing Authority
Statement of Cash Flows
For the Year Ended December 31, 2010

CASH FLOWS FROM OPERATING ACTIVITIES	
Cash received from tenants	\$ 256,212
Cash received from HUD and other governments	3,659,307
Cash received from other operating sources	30,822
Cash payments for housing assistance payments	(3,142,304)
Cash payments for administrative and operating expenses	<u>(1,183,481)</u>
NET CASH USED FOR OPERATING ACTIVITIES	(379,444)
CASH FLOWS FROM CAPITAL AND RELATED FINANCING ACTIVITIES	
Principal payments	(3,407)
Capital grants	698,107
Interest expense	(11,542)
Loan proceeds	174,802
Acquisition of capital assets	<u>(739,541)</u>
NET CASH PROVIDED BY CAPITAL AND RELATED FINANCING ACTIVITIES	118,419
CASH FLOWS FROM INVESTING ACTIVITIES	
Interest income	8,908
Investment activity	<u>(203,462)</u>
NET CASH USED FOR INVESTING ACTIVITIES	(194,554)
NET DECREASE IN CASH AND CASH EQUIVALENTS	(455,579)
CASH AND CASH EQUIVALENTS, BEGINNING	<u>1,144,915</u>
CASH AND CASH EQUIVALENTS, ENDING	<u><u>\$ 689,336</u></u>
RECONCILIATION OF CHANGE IN NET ASSETS TO NET CASH USED FOR OPERATING ACTIVITIES	
Operating loss	\$ (414,426)
Adjustments to reconcile operating loss to net cash used by operating activities	
Depreciation	396,484
(Increase) decrease in:	
Receivables, net of allowance	(48,122)
Prepaid expenses and other assets	(842)
Inventories, net of allowance	(4,177)
Increase (decrease) in:	
Accounts payable	(1,242)
Accounts payable - HUD/other governments	1,592
Tenant security deposits	3,641
Accrued liabilities	1,566
Accrued compensated absences	4,696
Deferred revenues	(316,219)
FSS liabilities	<u>(2,395)</u>
NET CASH USED FOR OPERATING ACTIVITIES	<u><u>\$ (379,444)</u></u>

The notes to the basic financial statements are an integral part of these statements.

Pickaway Metropolitan Housing Authority
Notes to the Basic Financial Statements
For the Year Ended December 31, 2010

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Reporting Entity

The Pickaway Metropolitan Housing Authority (PMHA or Authority) was created under the Ohio Revised Code Section 3735.27 to engage in the acquisition, development, leasing, and administration of low-rent housing programs. An Annual Contributions Contract (ACC) was signed by the Pickaway Metropolitan Housing Authority and the United States Housing Act of 1937 (42 U.S.C. 1437) Section 1.1. The Authority was also created in accordance with state law to eliminate housing conditions which are detrimental to the public peace, health, safety, morals, or welfare by purchasing, acquiring, constructing, maintaining, operating, improving, extending, and repairing housing facilities.

The nucleus of the financial reporting entity as defined by the Governmental Accounting Standards Board (GASB) Statement No. 14 is the "primary government." A fundamental characteristic of a primary government is that it is fiscally independent entity. In evaluating how to define the financial reporting entity, management has considered all potential component units. A component unit is a legally separate entity for which the primary government is financially accountable. The criteria of financial accountability are the ability of the primary government to impose its will upon the potential component unit. These criteria were considered in determining the reporting entity.

Pursuant to GASB Statement No. 20, *Accounting and Financial Reporting for Proprietary Funds and Other Governmental Entities That Use Proprietary Fund Accounting*, the Authority follows GASB guidance as applicable to proprietary funds and Financial Accounting Standards Board Statements and Interpretations, Accounting Principles Board Opinions, and Accounting Research Bulletins issued on or before November 30, 1989 that do not conflict with or contradict GASB pronouncements and chooses not to follow FASB guidance issued after this date.

Basis of Accounting

The accompanying financial statements have been prepared on the accrual basis of accounting, whereby revenues and expenses are recognized in the period earned or incurred. All transactions are accounted for as proprietary fund type in a single enterprise fund.

Use of Estimates

The preparation of financial statements in accordance with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements, and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

Cash and cash equivalents

The Authority considers all highly liquid investments (including restricted assets) with a maturity of three months or less when purchased to be cash equivalents.

Tenant Receivables – Recognition of Bad Debts

Bad debts are provided on the allowance method based on management's evaluation of the collectability of outstanding tenant receivable balances at the end of the year. The allowance for bad debts for tenant related receivables was \$27,121 at December 31, 2010.

Due From/To Other Programs

The following is the detail to reconcile to the Federal Data Schedule (FDS) submitted to HUD. These are eliminated from the basic financial statements:

	<u>O.B.A./CHIP</u>	<u>Section 8</u>	<u>Public Housing</u>	<u>Shelter Plus Care</u>	<u>Capital Fund</u>	<u>W.T.</u>	<u>Total</u>
Due From	\$ 13,494	\$ 28,492	\$ -	\$ -	\$ -	\$ -	\$ 41,986
Due To	\$ (9,375)	\$ -	\$ (24,858)	\$ (6,494)	\$ -	\$ (1,259)	\$ (41,986)

Pickaway Metropolitan Housing Authority
Notes to the Basic Financial Statements
For the Year Ended December 31, 2010

1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - CONTINUED

Property and Equipment

Property and equipment is recorded at cost. Costs that materially add to the productive capacity or extend the life of an asset are capitalized while maintenance and repair costs are expensed as incurred. The capitalization policy amount is \$2,500.

Useful Lives:	Buildings	27.5 – 40 years
	Buildings and Leasehold Improvements	15
	Furniture and Equipment	7
	Autos	5
	Computers	3

Depreciation is recorded on the straight-line method.

Investments

Investments are stated at fair value. Non-negotiable certificates of deposit and money market investments are stated at cost. Cost-based measurers of fair value were applied to non-negotiable certificates of deposit and money market investments.

Restricted Cash and Investments

Restricted cash and investments represents amounts received for the home ownership program, restricted HAP monies, 5H funds, and tenant security deposits.

Net Assets

Net assets represent the difference between assets and liabilities. Net assets invested in capital assets, net of related debt consist of capital assets, net of accumulated depreciation, reduced by the outstanding balances of any borrowings used for the acquisition, construction or improvements of those assets. Net assets are reported as restricted when there are limitations imposed on their use either through the enabling legislation adopted by the Board of Commissioners or through external restrictions imposed by creditors, grantors, or laws, or regulations of other governments. Restricted net assets are HAP (NRA) \$166,138.

Inventories

Inventories are stated at cost. The allowance for obsolete inventory was \$1,560 at December 31, 2010.

2. CASH AND INVESTMENTS

Cash

State statutes classify monies held by the Authority into three categories.

Active deposits are public deposits necessary to meet demands on the treasury. Such monies must be maintained either as cash in the Authority's Treasury, in commercial accounts payable or withdrawable on demand, including negotiable order of withdrawal (NOW) accounts, or in money market deposit accounts.

Inactive deposits are public deposits that the Authority has identified as not required for use within the current two-year period of designation of depositories. Inactive deposits must either be evidenced by certificates of deposit maturing not later than the end of the current period of designation of depositories, or by savings or deposit accounts including, but not limited to passbook accounts.

Interim deposits are deposits of interim monies. Interim monies are those monies which are not needed for immediate use but which will be needed before the end of the current period of designation of depositories. Interim deposits must be evidenced by time certificates of deposit maturing not more than one year from the date of deposit or by savings or deposit accounts including passbook accounts.

Protection of Authority's deposits is provided by the Federal Deposit Insurance Corporation (FDIC) by eligible securities pledged by the financial institution as security for repayment, but surety company bonds deposited with the treasurer by the financial institution or by a single collateral pool established by the financial institution to secure the repayment of all public monies deposited with the institution.

Pickaway Metropolitan Housing Authority
Notes to the Basic Financial Statements
For the Year Ended December 31, 2010

2. CASH AND INVESTMENTS – CONTINUED

Deposits

Custodial credit risk is the risk that, in the event of a bank failure, the Authority's deposits may not be returned. All deposits are collateralized with eligible securities in amounts equal to at least 105% of the carrying value of the deposits. Such collateral, as permitted by the Ohio Revised Code, is held in single financial institution collateral pool at Federal Reserve Banks, or at member banks of the Federal Reserve System, in the name of the respective depository bank and pledged as a pool of collateral against all of the public deposits it holds or as specific collateral held at the Federal Reserve Bank in the name of the Authority.

At December 31, 2010, the carrying amount of all Authority deposits was \$1,320,321. Based on the criteria described in GASB Statement No. 40, "Deposits and Investment Risk Disclosures", as of December 31, 2010, \$363,113 of the Authority's bank balance of \$1,363,113 was exposed to custodial risk as discussed above while \$1,000,000 was covered by Federal Deposit Insurance. The \$363,113 exposed to custodial risk was collateralized with securities held by the Authority or its agent but not in the Authority's name.

Book balances at December 31, 2010 were as follows:

	Cash and Cash Equivalents	Investments	Total
Public housing	\$ 229,910	\$ 474,241	\$ 704,151
Section 8	351,869	156,744	508,613
Rural rental housing	54,657	-	54,657
Business activities	39,406	-	39,406
CHIP	7,000	-	7,000
SPC	6,494	-	6,494
	TOTAL	\$ 630,985	\$ 1,320,321
Restricted cash and cash equivalents:	Restricted investments:		
Tenant security deposits - PH	\$ 19,150		\$ -
Tenant security deposits - WT	5,220		-
Tenant security deposits - OBA	2,566		-
5-H funds	-		240,377
FSS funds	13,445		-
HAP reserve	166,138		-
TOTAL RESTRICTED CASH AND CASH EQUIVALENTS	\$ 206,519	TOTAL RESTRICTED INVESTMENTS	\$ 240,377

Investments

HUD, State Statute and Board Resolutions authorize the Authority to invest in obligations of U.S. Treasury, agencies and instrumentalities, certificates of deposit, repurchase agreements, money market deposit accounts, municipal depository fund, super NOW accounts, sweep accounts, separate trading of registered interest and principal of securities, mutual funds, bonds and other obligations of this State, and the State Treasurer's investment pool. Investments in stripped principal or interest obligations reverse repurchase agreements and derivatives are prohibited. The issuance of taxable notes for the purpose of arbitrage, the use of leverage and short selling are also prohibited. An investment must mature within five years from the date of purchase unless also prohibited. An investment must mature within five years from the date that it will be held to maturity. Investments may only be made through specified dealers and institutions. Payment for investments may be made only upon delivery of the securities representing the investments to the treasurer or, if the securities are not represented by the certificate, upon receipt of confirmation of transfer from the custodian.

Pickaway Metropolitan Housing Authority
Notes to the Basic Financial Statements
For the Year Ended December 31, 2010

2. CASH AND INVESTMENTS – CONTINUED

The Authority's investments are categorized to give an indication of the level of risk assumed by the entity at year end. Category A includes investments that are insured or registered or for which the securities are held by the Authority or its agent in the Authority's name. Category B includes uninsured and unregistered investments for which the securities are held by the counterparty's trust department or agent in the Authority's name. Category C includes uninsured and unregistered investments for which securities are held by the counterparty or its trust department but not in the authority's name.

The Authority's non-negotiable certificates of deposit are classified as investments on the balance sheet but are considered as deposits for GASB Statement No. 3 purposes. Therefore, the categories described above do not apply.

3. CAPITAL ASSETS

A summary of capital assets at December 31, 2010, by class is as follows:

	Beginning Balance	Additions	Deletions	Ending Balance
CAPITAL ASSETS, NOT BEING DEPRECIATED				
Land	\$ 684,414	\$ -	\$ -	\$ 684,414
Construction in progress	40,926	-	(40,926)	-
CAPITAL ASSETS, BEING DEPRECIATED				
Buildings and improvements	9,988,023	731,279	(3,940)	10,715,362
Land improvements	-	3,940	-	3,940
Furniture and equipment - dwelling	99,992	17,470	-	117,462
Furniture and equipment - administrative	216,157	31,717	(60,173)	187,701
Leasehold improvements	57,495	-	-	57,495
Total	<u>10,361,667</u>	<u>784,406</u>	<u>(64,113)</u>	<u>11,081,960</u>
ACCUMULATED DEPRECIATION				
Buildings and improvements	(5,444,819)	(373,185)	-	(5,818,004)
Furniture and equipment - dwelling	(58,434)	(12,687)	-	(71,121)
Furniture and equipment - administrative	(205,044)	(6,675)	60,173	(151,546)
Land improvements	(2,717)	(104)	-	(2,821)
Leaschold improvements	(25,035)	(3,833)	-	(28,868)
Total	<u>(5,736,049)</u>	<u>(396,484)</u>	<u>60,173</u>	<u>(6,072,360)</u>
TOTAL CAPITAL ASSETS, NET	<u>\$ 5,350,958</u>	<u>\$ 387,922</u>	<u>\$ (44,866)</u>	<u>\$ 5,694,014</u>

4. ADMINISTRATIVE FEE

The Authority receives an "administrative fee" as part of the annual contribution from HUD to cover the costs (including overhead) of administering the Section 8 Housing Assistance Payments (HAP) Programs. The fee is a percentage of a HUD determined base rate for each unit per month under HAP contracts.

5. DEFINED BENEFIT PENSION PLANS – PUBLIC EMPLOYEES RETIREMENT SYSTEM

All full-time employees of the Authority participate in the Ohio Public Employees Retirement System (OPERS), a cost-sharing multiple employer public employee retirement system administered by the Public Employees Retirement Board. OPERS provide basic retirement, disability and survivor benefits, based on the eligible service credit to members and beneficiaries. Benefits are established by Chapter 145 of the Ohio Revised Code. OPERS issue a publicly available financial report that includes financial statements and required supplementary information for OPERS. Interested parties may obtain a copy by making a written request to 277 East Town Street, Columbus, Ohio 43215-4642 or by calling (614) 222-5601 or (800) 222-PERS.

A. Ohio Public Employees Retirement System (OPERS) administers three separate pension plans as described below:

- a. The Traditional Pension Plan – A cost-sharing multiple-employer defined benefit pension plan.

5. DEFINED BENEFIT PENSION PLANS – PUBLIC EMPLOYEES RETIREMENT SYSTEM – CONTINUED

- b. The Member-Directed Plan – A defined contribution plan in which the member invests both member and employer contributions (employer contributions vest over five years at 20% per year). Under the Member-Directed Plan, members accumulate retirement assets equal to the value of member and (vested) employer contributions plus, any investment earnings.
 - c. The Combined Plan – A cost-sharing, multiple-employer defined pension plan. Under the Combined Plan OPERS invests employer contributions to provide a formula retirement benefits similar in nature to the Traditional Pension Plan benefit. Member contributions, the investment of which is self-directed by the members, accumulate retirement assets in a manner similar to the Member-Directed plan.
- B. OPERS provide retirement, disability, survivor and death benefits and annual cost-of-living adjustments to members of the Traditional Pension and Combined Plans. Members of the Member-Directed Plan do not qualify for ancillary benefits.
- C. Authority to establish and amend benefits is provided in Chapter 145 of the Ohio Revised Code.
- D. OPERS issues a stand-alone financial report. Interested parties may obtain a copy by writing to OPERS. Attention: Finance Director, 277 East Town Street, Columbus, Ohio 43215-4642 or by calling (614) 222-5601 or 1-800-222-7377.
- E. The Ohio Revised Code provides statutory authority for member and employer contributions. For 2010, member and employer contribution rates were consistent across all three plans.

The member contribution rate was 10.0% for 2010, 2009, and 2008 for the Authority.

The employer contribution rate was 14.0% of covered payroll for 2010, 2009, and 2008 for the Authority.

The Authority's contributions to OPERS for the years ended December 31, 2010, 2009 and 2008 were \$107,710, \$95,466, and \$89,755, respectively, which were equal to the required contributions for those years.

6. POST EMPLOYMENT BENEFITS – OHIO PUBLIC EMPLOYEES RETIREMENT SYSTEM

- A. OPERS maintains a cost-sharing, multiple-employer defined benefit post-employment health care plan, which includes a medical plan, prescription drug program, and Medicare Part B Premium reimbursement, to qualifying members of both the Traditional Pension and the Combined plans. Members of the member-Directed Plan do not qualify for ancillary benefits, including post-employment health care coverage.

In order to qualify for post-employment health care coverage, age and service retirees under the Traditional Pension and Combined plans must have 10 or more years of qualifying Ohio service credit. Health care coverage for disability benefit recipients and qualified survivor benefit recipients is available. The health care coverage provided by OPERS meets the definition of an Other Post-Employment Benefit (OPEB) as described in GASB Statement No. 45.

The Ohio Revised Code permits, but does not mandate, OPERS to provide OPEB benefits to its eligible members and beneficiaries. Authority to establish and amend benefits is provided in Chapter 145 of the Ohio Revised Code.

OPERS issues a stand-alone financial report which may be obtained by writing to the OPERS, 277 East Town Street, Columbus, Ohio 43215-4642 or by calling (614) 222-5601 or (800) 222-7377.

Pickaway Metropolitan Housing Authority
Notes to the Basic Financial Statements
For the Year Ended December 31, 2010

6. POST EMPLOYMENT BENEFITS – OHIO PUBLIC EMPLOYEES RETIREMENT SYSTEM - CONTINUED

B. The Ohio Revised Code provides the statutory authority requiring public employers to fund post-retirement health care through their contributions to OPERS. A portion of each employer's contribution to OPERS is set aside for the funding of post retirements health care benefits.

Employer contribution rates are expressed as a percentage of the covered payroll of active members. In 2010, the Authority contributed at 14.0% of covered payroll. The Ohio Revised Code currently limits the employer contribution rate not to exceed 14.0% of covered payroll. Active members do not make contributions to the OPEB Plan.

OPERS' Post Employment Health Care Plan was established under, and is administered in accordance with, Internal Revenue Code 401(h). Each year, the OPERS Retirement Board determines the portion of the employer contribution rate that will be set aside for funding of post-employment health care benefits. For 2010, the employer contributions allocated to the health care plan was 5.50% of covered payroll. The OPERS Retirement Board is also authorized to establish rules for the payment of a portion of the health care benefits provided, by the retiree or their surviving beneficiaries. Payment amounts vary depending on the number of covered dependents and the coverage selected.

C. The employer contributions that were used to fund post-employment benefits were approximately \$54,000 for 2010, \$47,730 for 2009, \$44,878 for 2008 which were equal to the required contributions for each year.

D. The Health Care Preservation Plan (HCPP) adopted by the OPERS Retirement Board of September 9, 2004, was effective, January 1, 2007. Member and employer contribution rates increased as of January 1, 2006, January 1, 2007, and January 1, 2008, which allowed additional funds to be allocated to the health care plan.

7. COMPENSATED ABSENCES

Vacation and sick leave policies are established by the Board of Commissioners based on local and state laws. All permanent employees will earn 4.0 hours sick leave per 80 hours of service. Unused sick leave may be accumulated without limit. All permanent employees will earn vacation hours accumulated based on length of service. All vacation time accumulated will be paid upon separation.

At December 31, 2010, based on the vesting method \$85,160 was accrued by the Authority for unused vacation and sick time. This balance is the combined total of long-term compensated absences of \$52,546 and short-term which is included in accrued liabilities of \$32,614.

	Beginning Balance 12/31/09	Additions	Deletions	Ending Balance 12/31/10	Due in One Year
Compensated absences payable	\$ 80,464	\$ 72,828	\$ 68,132	\$ 85,160	\$ 32,614

8. INSURANCE

The Authority maintains comprehensive insurance coverage with private carriers for health, real property, building contents and vehicles. Vehicle policies include liability coverage for bodily injury and property damage. There was no significant reduction in coverage and no settlements exceeded insurance coverage during the past three years.

Pickaway Metropolitan Housing Authority
Notes to the Basic Financial Statements
For the Year Ended December 31, 2010

9. LONG-TERM DEBT

The Authority manages a multiple family housing project funded by the Department of Agriculture under its rural housing service. The following is a summary of activity occurring during 2010:

	<u>Beginning Balance</u>	<u>Additions</u>	<u>Deletions</u>	<u>Ending Balance</u>	<u>Due in One Year</u>
Mortgage					
Issued May 10, 1985					
Interest Rate 11.875%	\$ 520,283	\$ -	\$ 3,407	\$ 516,876	\$ 3,600
Rehab loan					
The Savings Bank					
Construction	66,008	174,802	-	240,810	3,100
Total	<u>\$ 586,291</u>	<u>\$ 174,802</u>	<u>\$ 3,407</u>	<u>\$ 757,686</u>	
			Current	6,700	
			Long-term	<u>\$ 750,986</u>	

Annual payments required vary: based on a calculation performed on a monthly basis; using the standard loan payment amount, overages on tenant accountants and the rental assistance requested.

The maximum construction loan credit is \$350,000. The current interest rate is 5.875%

10. ACCRUED LIABILITIES

The following is the detail of accrued liabilities at December 31, 2010:

Accrued payroll and payroll taxes	\$ 36,506
Accrued compensated absences - current	32,614
Other accrued liabilities	<u>871</u>
TOTAL ACCRUED LIABILITIES	\$ <u>69,991</u>

11. SUBSEQUENT EVENTS

There were no subsequent events noted to be disclosed through DATE, the date the financial statements were available to be issued. Any subsequent events after that date have not been evaluated.

Pickaway Metropolitan Housing Authority
Schedule of Federal Awards Expenditures
For the Fiscal Year Ended December 31, 2010

FEDERAL GRANTOR/PROGRAM TITLE	FEDERAL CFDA NUMBER	DISBURSEMENTS
<u>U. S. Department of Housing and Urban Development</u>		
<i>Direct</i>		
Public and Indian Housing	14.850	\$ 357,614
CFP Cluster		
Public Housing Capital Fund	14.872	112,004
Public Housing Capital Fund, Recovery Act	14.885	5,126
Total CFP Cluster		<u>117,130</u>
Shelter Plus Care	14.238	51,199
Section 8 Housing Choice Vouchers	14.871	<u>3,448,245</u>
Total Direct		3,974,188
<i>Passed through Pickaway County CDBG Program</i>		
Home Investment Pwartership Program (A) CHIP	14.239	<u>23,348</u>
Total U. S. Department of Housing and Urban Development		3,997,536
<u>U. S. Department of Agriculture</u>		
Rural Rental Housing Loans	10.415	<u>44,724</u>
Total U. S. Department of Agriculture		<u>44,724</u>
Total Federal Financial Assistance		<u>\$ 4,042,260</u>

See the Notes to the Schedule of Federal Awards Expenditures

Pickaway Metropolitan Housing Authority
Notes to the Schedule of Federal Awards Expenditures
For the Year Ended December 31, 2010

NOTE 1 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The accompanying Schedule of Federal Awards Expenditures is a summary of the activity of the Authority's federal award programs. The schedule has been prepared on the accrual basis of accounting.

Pickaway Metropolitan Housing Authority
Statement of Net Assets by Program
FDS Schedule Submitted to HUD
As of December 31, 2010

FDS Line Item Number	Account Description	Project Total	1 Business Activities	14.238 Shelter Plus Care
ASSETS				
111	Cash - unrestricted	\$ 210,760	\$ 36,840	\$ 6,494
113	Cash - other restricted	-	-	-
114	Cash - tenant security deposits	19,150	2,566	-
100	TOTAL CASH	229,910	39,406	6,494
125	Accounts receivable - miscellaneous	1,129	-	-
126	Accounts receivable tenants - dwelling rents	21,599	525	-
126.2	Allowance for doubtful accounts - other	(16,821)	-	-
128	Fraud recovery	-	-	-
128.1	Allowance for doubtful accounts - fraud	-	-	-
129	Accrued interest receivable	92	-	-
120	TOTAL RECEIVABLES, NET	5,999	525	-
131	Investments - unrestricted	233,864	-	-
135	Investments - restricted	240,377	-	-
142	Prepaid expenses and other assets	20,341	754	-
143	Inventories	13,109	-	-
143.1	Allowance for obsolete inventory	(1,300)	-	-
144	Interprogram due from	-	13,494	-
150	TOTAL CURRENT ASSETS	742,300	54,179	6,494
161	Land	560,154	105,320	-
162	Buildings	9,215,075	291,387	-
163	Furniture and equipment - dwellings	116,053	-	-
164	Furniture and equipment - admin	114,576	-	-
165	Leasehold improvements	57,495	-	-
166	Accumulated depreciation	(5,620,499)	(62,535)	-
160	TOTAL CAPITAL ASSETS, NET	4,442,854	334,172	-
190	TOTAL ASSETS	5,185,154	388,351	6,494
LIABILITIES				
312	Accounts payable <=90 days	9,937	10	-
321	Accrued wages/payroll taxes	11,964	749	-
322	Accrued compensated absences	22,857	1,274	-
325	Accrued interest payable	-	-	-
333	Accounts payable - other government	12,304	-	-
341	Tenant security deposits	-	2,566	-
342	Deferred revenue	19,150	-	-
343	Current Portion of Long Term Debt	-	-	-
345	Other Current Liabilities	54	-	-
347	Interprogram due to	24,858	2,375	6,494
310	TOTAL CURRENT LIABILITIES	101,124	6,974	6,494
351	Long-term debt	-	-	-
354	Long-term compensated absences	36,518	2,371	-
353	Other long-term liabilities	-	-	-
350	TOTAL NON-CURRENT LIABILITIES	36,518	2,371	-
300	TOTAL LIABILITIES	137,642	9,345	6,494
508.1	Invested in capital assets, net of related debt	4,442,854	334,172	-
511.1	Restricted Net Assets	-	-	-
512.1	Unrestricted net assets	604,658	44,834	-
513	TOTAL NET ASSETS	5,047,512	379,006	-
600	TOTAL LIABILITIES AND NET ASSETS	\$ 5,185,154	\$ 388,351	\$ 6,494

14.871 Housing Choice Vouchers	14.885 Formula Capital Fund Stimulus Fund	14.239 HOME Investment Partnerships Program	10.415 Rural Rental Housing Loans	Interprogram Eliminations	Total
\$ 172,286	\$ -	\$ 7,000	\$ 49,437	\$ -	\$ 482,817
179,583	-	-	-	-	179,583
-	-	-	5,220	-	26,936
<u>351,869</u>	<u>-</u>	<u>7,000</u>	<u>54,657</u>	<u>-</u>	<u>689,336</u>
82,621	-	-	-	-	83,750
1,475	-	-	2,934	-	26,533
(375)	-	-	-	-	(17,196)
32,161	-	-	-	-	32,161
(14,417)	-	-	-	-	(14,417)
237	-	-	-	-	329
<u>101,702</u>	<u>-</u>	<u>-</u>	<u>2,934</u>	<u>-</u>	<u>111,160</u>
156,744	-	-	-	-	390,608
-	-	-	-	-	240,377
5,033	-	-	1,480	-	27,608
2,613	-	-	-	-	15,722
(260)	-	-	-	-	(1,560)
28,492	-	-	-	(41,986)	-
<u>646,193</u>	<u>-</u>	<u>7,000</u>	<u>59,071</u>	<u>(41,986)</u>	<u>1,473,251</u>
-	-	-	18,940	-	684,414
-	-	-	1,212,840	-	10,719,302
-	-	-	1,409	-	117,462
73,126	-	-	-	-	187,702
-	-	-	-	-	57,495
(38,453)	-	-	(350,874)	-	(6,072,361)
<u>34,673</u>	<u>-</u>	<u>-</u>	<u>882,315</u>	<u>-</u>	<u>5,694,014</u>
680,866	-	7,000	941,386	(41,986)	7,167,265
1,732	-	-	3,224	-	14,903
23,794	-	-	-	-	36,507
8,483	-	-	-	-	32,614
-	-	-	870	-	870
-	-	-	-	-	12,304
-	-	-	5,220	-	7,786
-	-	-	-	-	19,150
-	-	-	3,600	-	3,600
-	-	-	-	-	54
-	-	7,000	1,259	(41,986)	-
<u>34,009</u>	<u>-</u>	<u>7,000</u>	<u>14,173</u>	<u>(41,986)</u>	<u>127,788</u>
-	-	-	754,086	-	754,086
13,657	-	-	-	-	52,546
<u>13,445</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>13,445</u>
<u>27,102</u>	<u>-</u>	<u>-</u>	<u>754,086</u>	<u>-</u>	<u>820,077</u>
61,111	-	7,000	768,259	(41,986)	947,865
34,673	-	-	124,629	-	4,936,328
166,138	-	-	-	-	166,138
<u>418,944</u>	<u>-</u>	<u>-</u>	<u>48,498</u>	<u>-</u>	<u>1,116,934</u>
<u>619,755</u>	<u>-</u>	<u>-</u>	<u>173,127</u>	<u>-</u>	<u>6,219,400</u>
<u>\$ 680,866</u>	<u>\$ -</u>	<u>\$ 7,000</u>	<u>\$ 941,386</u>	<u>\$ (41,986)</u>	<u>\$ 7,167,265</u>

Pickaway Metropolitan Housing Authority
Statement of Revenues, Expenses and Changes in Net Assets by Program
FDS Schedule Submitted to HUD
For the Year Ended December 31, 2010

FDS Line Item No.	Account Description	Project Total	I Business Activities	14,238 Shelter Plus Care
	REVENUE			
703	Net tenant rental revenue	\$ 209,839	\$ 20,755	\$ -
704	Tenant revenue - other	20,492	-	-
705	TOTAL TENANT REVENUE	230,331	20,755	-
706	HUD PHA operating grants	389,628	-	51,199
706.1	Capital grants	79,990	-	-
708	Other government grants	-	-	-
711	Investment income - unrestricted	3,168	260	2
714	Fraud recovery	-	-	-
715	Other Revenue	9,880	-	-
720	Investment income - restricted	2,892	-	-
700	TOTAL REVENUE	715,889	21,015	51,201
	EXPENSES			
911	Administrative salaries	91,158	18,817	588
912	Auditing fees	4,500	-	-
913	Management fees	-	-	-
915	Employee benefit contributions - admin	44,908	-	-
916	Office Expenses	34,061	577	38
917	Legal Expense	3,000	-	-
918	Travel	16,400	-	-
924	Tenant services - other	1,471	-	-
931	Water	64,914	125	-
932	Electricity	12,575	129	-
933	Gas	9,314	588	-
938	Other utilities	537	-	-
941	Ordinary maintenance/operation - labor	52,671	5,486	-
942	Ordinary maintenance/operation - materials and other	45,767	304	-
943	Ordinary maintenance/operation - contract costs	50,830	2,960	-
945	Employee benefit contributions - ordinary maintenance	17,464	-	-
961	Insurance premiums	20,799	690	-
962	Other general expenses	3,525	-	-
962.1	Compensated absences	43,249	2,995	-
963	Payments in lieu of taxes	12,304	-	-
964	Bad debts - tenant rents	24,167	416	-
967	Interest expense	-	-	-
969	TOTAL OPERATING EXPENSES	553,614	33,087	626
970	EXCESS OPERATING REVENUE OVER/(UNDER) OPERATING EXPENSES	162,275	(12,072)	50,575
972	Casualty Losses- Non-capitalized	(6,651)	-	-
973	Housing assistance payments	-	-	50,575
974	Depreciation expense	352,862	10,705	-
900	TOTAL EXPENSES	899,825	43,792	51,201
1001	Operating transfers in	20,000	-	-
1002	Operating transfers out	(20,000)	-	-
1010	Total other financing sources/(uses)	-	-	-
1000	EXCESS OF REVENUE OVER/(UNDER) EXPENSES	(183,936)	(22,777)	-
1103	Beginning equity	5,004,167	401,783	-
	NET ASSETS, END OF YEAR	\$ 4,820,231	\$ 379,006	\$ -

14.871 Housing Choice Vouchers	14.885 Formula Capital Fund Stimulus Fund	14.239 HOME Investment Partnerships Program	10.415 Rural Rental Housing Loans	Total
\$ -	\$ -	\$ -	\$ 14,475	\$ 245,069
-	-	-	2,231	22,723
-	-	-	16,706	267,792
3,466,627	-	-	44,724	3,952,178
-	5,126	-	612,991	698,107
-	-	23,348	-	23,348
1,790	-	-	34	5,254
13,086	-	-	-	13,086
7,856	-	-	-	17,736
762	-	-	-	3,654
<u>3,490,121</u>	<u>5,126</u>	<u>23,348</u>	<u>674,455</u>	<u>4,981,155</u>
184,100	-	3,500	-	298,163
3,566	-	-	-	8,066
-	-	-	6,876	6,876
72,494	-	-	-	117,402
69,586	-	-	536	104,798
3,266	-	-	1,635	7,901
4,455	-	-	-	20,855
-	-	-	-	1,471
-	-	-	10,453	75,492
-	-	-	1,591	14,295
-	-	-	1,605	11,507
-	-	-	1,024	1,561
-	-	-	-	58,157
-	-	-	-	46,071
-	-	-	168,806	222,596
-	-	-	-	17,464
9,160	-	-	2,022	32,671
-	-	-	-	3,525
21,889	-	-	-	68,133
-	-	-	-	12,304
2,538	-	-	-	27,121
-	-	-	11,542	11,542
<u>371,054</u>	<u>-</u>	<u>3,500</u>	<u>206,090</u>	<u>1,167,971</u>
3,119,067	5,126	19,848	468,365	3,813,184
-	-	-	-	(6,651)
3,071,881	-	19,848	-	3,142,304
5,310	-	-	27,607	396,484
<u>3,448,245</u>	<u>-</u>	<u>23,348</u>	<u>233,697</u>	<u>4,700,108</u>
-	-	-	-	20,000
-	-	-	-	(20,000)
-	-	-	-	-
41,876	5,126	-	440,758	281,047
<u>577,879</u>	<u>222,155</u>	<u>-</u>	<u>(267,631)</u>	<u>5,938,353</u>
<u>\$ 619,755</u>	<u>\$ 227,281</u>	<u>\$ -</u>	<u>\$ 173,127</u>	<u>\$ 6,219,400</u>

Pickaway Metropolitan Housing Authority
Summary of Activity
For the Year Ended December 31, 2010

At the close of the fiscal year ended December 31, 2010, Pickaway Metropolitan Housing Authority had the following operations management:

	<u>Units</u>
Low Rent Public Housing Program	108
Section 8 Housing Choice Vouchers	635
Rural Rent Housing Program	<u>16</u>
Total Units	<u><u>759</u></u>

Pickaway Metropolitan Housing Authority
Actual Modernization Stimulus Grant Cost Certification
For the Year Ended December 31, 2010

1 - The Actual Modernization Stimulus Grant Costs are as follows:

	Project OH16-5059-501-09
Funds Approved	\$ 251,339
Funds Expended	251,339
Excess/(Deficiency) of Funds Approved	<u>\$ -</u>

Date Submitted

March 20, 2010

2 - The distribution of costs as shown on the Schedule/Report of Modernization Stimulus Grant Expenditures submitted to HUD for approval are in agreement with the Authority's records.

3 - All Modernization Stimulus Grant Costs have been paid and all related liabilities have been discharged through payment.

Pickaway Metropolitan Housing Authority
Actual Modernization Grant Cost Certification
For the Year Ended December 31, 2010

1 - The Actual Modernization Grant Costs are as follows:

	Project OH16-PO59-501-08
Funds Approved	\$ 198,561
Funds Expended	198,561
Excess/(Deficiency) of Funds Approved	<u>\$ -</u>

Date Submitted

October 20, 2010

2 - The distribution of costs as shown on the Schedule/Report of Modernization Grant Expenditures submitted to HUD for approval are in agreement with the Authority's records.

3 - All Modernization Grant Costs have been paid and all related liabilities have been discharged through payment.



**Report on Internal Control Over Financial Reporting and on Compliance and Other Matters Required by
*Government Auditing Standards***

Board of Commissioners
Pickaway Metropolitan Housing Authority
176 Rustic Drive
Circleville, Ohio 43113

We have audited the financial statements of the business-type activities of the Pickaway Metropolitan Housing Authority, Pickaway County, Ohio (the Authority) as of and for the year ended December 31, 2010, and have issued our report thereon dated May 31, 2011. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in the Comptroller General of the United States' *Government Auditing Standards*.

Internal Control Over Financial Reporting

In planning and performing our audit, we considered the Authority's internal control over financial reporting as a basis for designing our audit procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of opining on the effectiveness of the Authority's internal control over financial reporting. Accordingly, we have not opined on the effectiveness of the Authority's internal control over financial reporting.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, when performing their assigned functions, to prevent, or detect and timely correct misstatements. A material weakness is a deficiency, or combination of internal control deficiencies resulting in more than a reasonable possibility that a material misstatement of the Authority's financial statements will not be prevented, or detected and timely corrected.

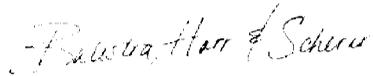
Our consideration of internal control over financial reporting was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over financial reporting that might be deficiencies, significant deficiencies or material weaknesses. We did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses, as defined above.

Compliance and Other Matters

As part of reasonably assuring whether the Authority's financial statements are free of material misstatement, we tested its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could directly and materially affect the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit and accordingly, we do not express an opinion. The results of our tests disclosed no instances of noncompliance or other matters we must reported under *Government Auditing Standards*.

Board of Commissioners
Pickaway Metropolitan Housing Authority
Pickaway County, Ohio
Report on Internal Control Over Financial Reporting and on Compliance and Other Matters Required By
Government Auditing Standards
Page 2

We intend this report solely for the information and use of management, Board of Commissioners, federal awarding agencies, pass-through entities, and others within the Authority. We intend it for no one other than these specified parties.



Balestra, Harr & Scherer, CPAs, Inc.
May 31, 2011



Report on Compliance with Requirements Applicable to Each Major Federal Program and on Internal Control Over Compliance Required by OMB Circular A-133

Board of Commissioners
Pickaway Metropolitan Housing Authority
176 Rustic Drive
Circleville, Ohio 43113

Compliance

We have audited the compliance of Pickaway Metropolitan Housing Authority, Pickaway County, Ohio, (the Authority), with the types of compliance requirements described in the U.S. Office of Management and Budget (OMB) *Circular A-133, Compliance Supplement* that could directly and materially affect Pickaway Metropolitan Housing Authority's major federal program for the year ended December 31, 2010. The summary of auditor's results section of the accompanying Schedule of Findings identifies the Authority's major federal program. The Authority's management is responsible for complying with the requirements of laws, regulations, contracts and grants applicable to each major federal program. Our responsibility is to express an opinion on the Authority's compliance based on our audit.

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits included in the Comptroller General of the United States' *Government Auditing Standards*; and OMB Circular A-133, *Audits of States, Local Governments, and Non-Profit Organizations*. Those standards and OMB Circular A-133 require that we plan and perform the audit to reasonably assure whether noncompliance occurred with the compliance requirements referred to above that could directly and materially affect a major federal program. An audit includes examining, on a test basis, evidence about the Authority's compliance with those requirements and performing other procedures we considered necessary in the circumstances. We believe our audit provides a reasonable basis for our opinion. Our audit does not provide a legal determination on the Authority's compliance with those requirements.

In our opinion, the Pickaway Metropolitan Housing Authority complied, in all material respects, with the requirements referred to above that could directly and materially affect its major federal program for the year ended December 31, 2010.

Internal Control Over Compliance

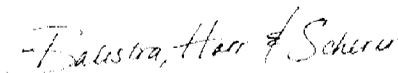
The Authority's management is responsible for establishing and maintaining effective internal control over compliance with requirements of laws, regulations, contracts and grants applicable to federal programs. In planning and performing our audit, we considered the Authority's internal control over compliance with requirements that could directly and materially affect a major federal program, to determine our auditing procedures for the purpose of opining on compliance and to test and report on internal control over compliance in accordance with OMB Circular A-133, but not for the purpose of opining on the effectiveness of internal control over compliance. Accordingly, we have not opined on the effectiveness of the Authority's internal control over compliance.

Board of Commissioners
Pickaway Metropolitan Housing Authority
Report on Compliance with Requirements Applicable to Each Major Federal Program and on Internal Control Over
Compliance Required by OMB Circular A - 133
Page 2

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, when performing their assigned functions, to prevent, or to timely detect and correct, noncompliance with a federal program compliance requirement. A material weakness in internal control over compliance is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a federal program compliance requirement will not be prevented, or timely detected and corrected.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and would not necessarily identify all deficiencies in internal control over compliance that might be deficiencies, significant deficiencies or material weaknesses. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses, as defined above.

We intend this report solely for the information and use of management, Board of Commissioners, others within the Authority, federal awarding agencies, and pass-through entities. It is not intended for anyone other than these specified parties.


Balestra, Harr & Scherer, CPAs, Inc.
May 31, 2011

Pickaway Metropolitan Housing Authority
Schedule of Findings
OMB Circular A-133 Section .505
December 31, 2010

1. SUMMARY OF AUDITOR'S RESULTS

(d)(1)(i)	Type of Financial Statement Opinion	Unqualified
(d)(1)(ii)	Were there any material control weaknesses reported at the financial statement level (GAGAS)?	No
(d)(1)(ii)	Were there any other significant deficiencies in internal control reported at the financial statement level (GAGAS)?	No
(d)(1)(iii)	Was there any reported material non-compliance at the financial statement level (GAGAS)?	No
(d)(1)(iv)	Were there any material control weakness conditions reported for major federal programs?	No
(d)(1)(iv)	Were there any significant deficiencies in internal control reported for major federal programs?	No
(d)(1)(v)	Type of Major Programs' Compliance Opinion	Unqualified
(d)(1)(vi)	Are there any reportable findings under section .510?	No
(d)(1)(vii)	Major Programs (list):	Section 8 Housing Choice Vouchers (CFDA #14.871)
(d)(1)(viii)	Dollar Threshold: Type A/B Programs	Type A: > \$300,000 Type B: all others
(d)(1)(ix)	Low Risk Auditee?	Yes

**2. FINDINGS RELATED TO THE FINANCIAL STATEMENTS
REQUIRED TO BE REPORTED IN ACCORDANCE WITH GAGAS**

None

3. FINDINGS AND QUESTIONED COSTS FOR FEDERAL AWARDS

None

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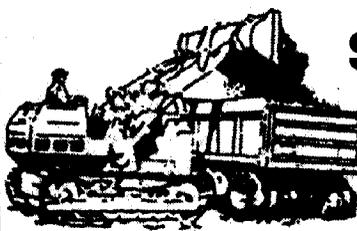
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NOTICE OF PUBLIC HEARING

The PICKAWAY METROPOLITAN HOUSING AUTHORITY in compliance with the Quality Housing and Work Responsibility Act of 1998, has a draft of its 2012 Annual Plan available for review. The plan may be reviewed at the Pickaway MHA office, located at 176 Rustic Drive, Circleville, Ohio. The Pickaway MHA office hours are 8:00 a.m. to 4:30 p.m., Monday through Friday.

A Public Hearing will be conducted on Wednesday, August 3, 2011 at 10:00 a.m., at the Pickaway MHA Conference Room for the purpose of receiving input on the plan. Written comments will also be considered if attendance at the hearing is not possible.

Kim Hartinger, Executive Director

Housing Needs

9.0 Housing Needs

In March, 2011, the Pickaway Metropolitan Housing Authority prepared information and statistics for use in preparation of an Analysis of Impediments to Fair Housing for the Pickaway County Development and Planning Department. The information used in preparation of the Analysis has provided great insight into Demographic and Housing Needs of Pickaway County. Excerpts of the Analysis, comparison of our agency statistics, and relative conclusions drawn are included in this section of the Annual Plan.

History, Statistics and Demographics Completed March, 2011

INTRODUCTION

The County of Pickaway, Ohio, is a historic small rural county in South-Central Ohio, with industrial, agricultural and service sectors. Pickaway County has a land area of 2000 square miles, with a density of 105 persons per square mile. Pickaway County is located within the Columbus Metropolitan Statistical Area. Population according to 2009 U.S. Census Bureau data is listed as 54,734.

DEMOGRAPHICS

Population: The population for Pickaway County has grown by 3.8% between 2000 and mid-2009, showing a total increase to 54,734. Pickaway County's residential cities and villages, particularly Circleville and areas north and east, are viewed as "bedroom communities" when related to Columbus and Lancaster. Persons who do not wish to live in a larger city but who want proximity to the greater Columbus area or other locations with enhanced employment opportunities may choose to live in Pickaway County. In actuality, the loss of industry and large scale employers have slowed the rate of growth in Pickaway County overall, and Pickaway County has likely lost residents to other larger communities as a result.

Population with respect to Race and Ethnicity: From a race and ethnicity demographic, 92.6% of county residents are identified as white persons; 5.7% are identified as black persons; .3% are identified as American Indian/Alaska Native persons; .3% are identified as Asian persons; and .9% of the populations is identified as Hispanic persons or persons with Latino origins. White persons who are not Hispanic represent 91.7% of the population and persons reporting 2 or more races represent 1.1% of the population. PMHA waiting list data supports these statistics as it pertains to applicants for housing programs administered by the agency.

Population with respect to age: There are 13,996 persons with age ranging from birth to 19 years of age, representing 26% of the county population. Persons with age ranging from 20 to 44 years total 26,583 or 49% of the population, while an overlapping statistic shows that persons in the age range of 25-64 number 30,180 or 55% of the population. Those considered "elderly" in the 65-84 year age range total only 6,300

persons or 12% of the population, but as persons continue to age while residing in Pickaway County, this number will increase, especially if growth remains steady or population decreases.

Family Composition: U.S. Census Bureau statistics show that through 2005-2009, Pickaway County's family household composition continued to follow traditional patterns. Of 17,885 households, 12,951 were family households, representing 72%. Of those households, 5,975 were households with their own children under 18 years of age. Male households, with no wife present represents 635 households (<4%), and female households with no husband present represents 1,846 households (>10%). Nonfamily households total 4,934, with householder living alone total 4,079 (83%) and those 65 years of age or older 1,895 (38%). The average household size is 2.74 and the average family size is 3.23

Disability Population: A 2004 Miami University Scripps Gerontology Center report cited 40% of Pickaway County residents age 60 or older as having at least one disability. Of those 60 or older with disabilities, 9.2% have self-care disabilities, and 39% have at least one physical, mental, sensory or self-care disability. These disabilities in Pickaway County residents will only increase as long-term residents continue to age in place. The Miami study states that this figure could increase to an estimated 13,495 persons by year 2020 as Pickaway County residents over the age of 60 will increase by 73.3% during this time frame.

Randy Beach, Superintendent of Pickaway County's Developmental Disabilities Program, stated that 4% of all Ohioans between ages 18 - 64 have some disability that interferes with independent living, while 50% of those individuals have limited capacity for self-care. This is inclusive of cognitive, hearing and ambulatory disabilities. Mr. Beach stated that he feels those numbers are representative of Pickaway County, and added that to be eligible for services from his agency's programs, an individual must exhibit limited capabilities in 3 out of 8 categories of daily living, in addition to being diagnosed with a disability.

Language Spoken at Home: For population 5 years of age or older, 98% of the population speaks English as the only language in their home. Those residents who speak English "less than well" represent less than 5% of the population. Of persons who are 5 years of age or older, 475 speak Spanish, 288 speak other Indo-European languages, 38 speak Asian and Pacific Islander languages, and 86 speak other languages.

Income Concentrations: The Pickaway County Median family income is \$60,028, with per capita income in dollars listed as \$20,906. For families, 4% of the population has less than \$10,000 in income, 10% have income between \$10,000 and \$25,000, and 27% have income between \$25,000 and \$50,000. The largest segments of the population are 24% having income between \$50,000 to \$75,000, and 32% of families listing income between \$75,000 and \$150,000. Only 3% of families cite income above \$150,000. For nonfamily households, the Median income is \$29,309.

In the period 2008-2009, the percentage of families whose income is below the poverty level is 8.6%. In families with children under 18 years of age, the percentage is listed as 14.2%, and in families who have related children under 5 years of age, the poverty level is listed at 22.9%. For traditional married families, these percentages decrease significantly with 4.4% having income below the poverty level. For traditional households, when considering related children under 18 years of age, 6.9% of the households are below the poverty level, and 4.7% of households with related children under 5 years of age are below the poverty level. In households where the head of household is female with no husband present, 28.2% of the households fall under the poverty level. For those households with related children under 18 years of age, 33.7% fall below the poverty level, and in those households with related children under 5 years of age, 49.1% of the households fall under the poverty level.

When looking at the entire population of Pickaway County, persons who fall under the poverty level are listed at 11.7% of the population. Those under 18 years of age who are under the poverty level are listed at 17.3%, with related children under 18 years comprising 17% and related children under 5 years comprising 24.8% of individuals below the poverty level. For persons over 18 years of age, up to age 64 include 10.4% of the population who fall under the poverty level, and 6.6% of those 65 years of age and older fall under the poverty level.

Housing Inventory: According to the U.S. Census Bureau, for the period ending 2009, there were 19,796 total housing units in Pickaway County. Of those units, 17,885 were occupied and 1,911 were vacant, representing a minimum 90% occupancy rate county-wide. As stated in previous analysis, a significant portion of the reported vacancies are likely occupied units but the occupants may not have participated in the census. Of these units, most are single family dwellings (79%), duplex units (4%), and multi-unit complexes (7%). Mobile homes represent 10% of the available housing units. As could be expected from the economic downturn and the severe impact on the housing market, only 20 building permits were issued in Pickaway County in 2009. This is a decrease from 169 permits issued in 2005, and places Pickaway County 67th in the State in new housing construction. Most existing housing is less than 50 years (63%), with 5,512 units (28%) being built since 1990. However, since 2005, only 547 new homes have been constructed in Pickaway County, representing only 3% of the current housing stock. Over 2,000 homes (12%) were constructed between 1940 and 1960, and over 4,800 homes built prior to 1939 (25%) remain in the residential portfolio. LMI families who are homeowners are traditionally single, widowed residents who have difficulty maintaining their homes. This housing stock primarily consists of wood lap sided houses with large wooden double hung windows, slate siding and coal, wood, LP or utility gas systems. Often the electrical is original with phases of updating. Cast iron drains and galvanized water lines are normal, and usually the exterior has suffered due to material deterioration from lack of maintenance and age. The local health department certifies that there are homes in the county that lack indoor plumbing (36 units) and kitchen facilities (61). PMHA staff feels that the majority of new housing was constructed in northern Pickaway County in the Bloomfield Hills and Foxfire Subdivisions. Housing construction for the purpose of private rental unit housing is virtually non-existent in Pickaway County at this time.

Housing Size: Of the units available, 78 are 1 room units (<1%), 185 are 2 room units (<1%), 838 are 3 room units (4%), 2,517 are 4 room units (13%), 4,832 are 5 room units (24%), 4,208 are 6 room units (21%), 3,222 are 7 room units (16%), 3,916 have 8 rooms or more (20%).

Of the 19,796 units available, <1% are efficiency units that do not feature a separate bedroom, 5% are 1 bedroom units, 23% are 2 bedroom units, 52% are 3 bedroom units, 16% are four bedroom units and 3% have 5 or more bedrooms.

Housing Tenure: Of the units occupied, 13,416 (75%) are owner occupied and 4,469 (25%) are renter-occupied.

Housing Transition: Of the units occupied, 75% have resided in their current unit since 1990 or later, 18% moved in between 1970 to 1990, and 7% have resided in their current home prior to 1969.

Housing Affordability: According to the Census Bureau information, of the occupied units, 3% are paying less than \$200 in gross rent; 2% are paying between \$200 to \$299 in gross rent; 17% are paying \$300 to \$499 in gross rent; 39% are paying between \$500 to \$749 in gross rent; 31% are paying between \$750 to \$999 in gross rent, 8% are paying over \$1,000 monthly in gross rent.

When applied to percentages of household income, 13% of renters are paying less than 15 percent of their total household income for gross rent. 15% of renters are paying 15 percent to 20 percent of their total household income for gross rent; 16% are paying 20% to 24.9%; 13% are paying 25% to 30%; and 8% are paying 30% to 35%. The greatest rent burden is borne by 35% of renters in Pickaway County who pay 35% or more of their household income for gross rent. This group of renters is significantly burdened with rental and utility costs.

Housing Availability to Moderate Income and LMI: Two of the largest housing providers to LMI households are the local Housing Authority and Community Action Agency. At the time this analysis was prepared, the Community Action Agency had 8 vacancies in their tax credit rental properties of Ohio Heights, Lincoln Heights and Prairie View. At the time this report was written, the local Housing Authority currently had no vacancies in owned or managed housing, and maintains a waiting list for all properties. The Housing Choice Voucher program assists households with paying their rent to private landlords. This waiting list had 734 names and the wait time was approximately two years for all applicants with the exception of veterans. The public housing program maintains waiting lists by bedroom size, but the cumulative total of all persons waiting on housing for bedroom sized units ranging from one to four bedrooms was 331. The two bedroom wait list is currently closed due to the size of the wait list and the projected wait time. A Rural Development property in Williamsport had a waiting list of 54 persons. The Housing Authority also manages properties for non-profit organizations in Pickaway County. Pickaway Terrace currently had a waiting list of 90 applicants, Eden Place had a waiting list of 15 applicants and Louise Terrace had a waiting list of 6 applicants.

The Housing Authority Housing Choice Voucher Program is authorized to issue 635 vouchers monthly. Because funding available is less than funding needed to sustain 635 vouchers, the average amount of vouchers issued in 2010 was 613 vouchers per month. In assisting these households, the Housing Authority expended 100% of its funding. The assistance is issued not only in the form of rental assistance but also utility assistance based on HUD's calculation for those persons who receive full rental assistance (rent 100% paid). The amount of assistance required to support each household has increased to the level that funding does not support the issuance of 635 vouchers per month.

Additionally, voucher assistance is provided for several residents of the Tax Credit properties owned by the Community Action Agency.

Private Market Response: The private market has provided quality housing in response to the needs of those seeking to obtain homeownership. Housing development by Columbus area builders provided many homes in the \$100,000 to \$160,000 range. Older homes and smaller homes are primarily those available to low- and moderate-income residents. These homes often are substandard and require rehabilitation as they come available. There are no builders who are targeting affordable housing for households with lower incomes. LMI families often lack the credit and buying power in the private market. Credit problem and employment records can curtail any hope of borrowing funds for homeownership in a time when lenders have tightened mortgage lending criteria.

ASSESSMENT OF HOUSING POLICIES

We have no local media in any language other than English, thus language barriers would exist for those who are not fluent in the English language. For LMI persons seeking housing through assisted housing programs, the local housing authority has access to housing documents printed in various languages. The agency also has assistance agreements with an interpreter for the hearing impaired and a Spanish speaking interpreter.

ACCESSIBILITY FOR PERSONS WITH DISABILITIES

Pickaway County coordinates with the Passport Program to assist individuals with modification of entryways to their homes in order for them to be more easily accessible. A local organization, Circle of Caring, also provides modifications such as ramp construction to ease access at residences. Pickaway County Hands For Disabled assists with loaning accessible apparatus during any period pending receipt of permanent equipment, or for those suffering short term disabilities following injury, accident or surgeries.

The Pickaway County Rural Transit Program provides low cost transportation to person with disabilities and immigrants. The Pickaway County Department of Jobs and Family Services also cooperates with the Pickaway County Senior Center to provide adequate transportation to assist many elderly persons with disabilities. PICCA, the local Community Action Agency also operates a county-wide transportation program.

Analysis

Statistics from Pickaway MHA, the largest provider of housing assistance in Pickaway County, support statistics from the Census Bureau.

From the agency waiting lists, for households of all sizes, 75% of the applicants from all programs have incomes falling below \$14,450 annually. The \$14,450 represents the extremely low income guideline (30% of area median income) for a one person household in Pickaway County. In the largest programs, Housing Choice Voucher and Public Housing, 81% of all applicants have income below this level. These programs overwhelmingly represent applicant households including children.

The extremely low income level for a two person household is \$16,500, with 12% of the applicants of all programs reporting incomes between \$14,450 and \$16,500. The largest majority of applicants in this group are elderly households. For the Housing Choice Voucher and Public Housing programs, 5.5% fall into this category. Therefore, the data reflects that over 86% of all applicants, for the largest two programs administered by PMHA have annual incomes at or below \$16,500.

Female Head of Households represent 80% of all applicants for the Housing Choice Voucher and Public Housing programs. For all programs combined, this figure represents 71% of applicants.

While eligibility for our management properties focuses on an age eligibility criteria of 62 years of age or older, PMHA sought to determine how many "older" elderly apply for our housing programs. We bumped the age search to those who are 65 or older and found that 3% of program applicants in the Housing Choice Voucher and Public Housing programs fall into this category. The management properties (designated for those 62 years of age or older, disabled or handicapped HOH/S/K) understandably saw a higher rate of those over 65 who are applying for housing at 53%.

We also reviewed the waiting list data to determine if there were significant applicants applying for assistance who featured a HOH/S/K who was under 62, but disabled. The average for combined Housing Choice Voucher and Public Housing were 2.5%. The management properties results were widespread. Pickaway Terrace had 7% of applicants under 62, but disabled, while Eden Place had 27%. Louise Terrace does not permit HOH/S/K under 62 to reside in the building. Williamsport Terrace, a Rural Development property, showed 4% of applicants as disabled, and under 62 years of age. Pickaway Terrace numbers in this area may be low because the one bedroom waiting list was closed until Rural Development informed us in 2011 that they do not permit the closing of waiting lists.

Based on the waiting list data, it is apparent that area residents are aware of, and apply for PMHA housing programs.

9.1: PMHA Conclusions and Strategy for Housing Needs

The Housing Choice Voucher program is the PMHA largest program. Funding does not support the awarded number of 635 vouchers to be issued monthly. The program consistently expends 98% - 100% of allocated HAP subsidy each year. In 2010, subsidy expenditure was 100.7%. HCV staff continues to focus on administering a strong program and receives High Performer status on a repeated basis each year.

The Public Housing program has worked diligently within the last two years to improve unit turn around time, quality use of capital improvement funds to minimize required repairs at unit turn around time, and reduction in tenant accounts receivable. The agency conducts monthly housing inspections of their housing units and maintains a quarterly pest control treatment rotation. Agency staff is committed to keeping all residential units at a 98% or higher occupancy rate at all times. The agency recently purchased a bed bug heat treatment system for use in treating any infested unit under supervision of the agency. This eliminates the wait time associated with scheduling an outside contractor to complete the treatment. The Public Housing program also is a repeat High Performer.

Housing Choice Voucher participants are able to find rental housing in the rural areas of the county, however a great deal of that rental housing stock is aged. Without additional HAP funding, it does not appear that a shortage of rental housing through this program will develop. PMHA works diligently with area landlords to advertise rental units that are available. This is done by creating a list of area landlords who commonly rent to persons on the Housing Choice Voucher program, and by maintaining a list of available rentals which is updated weekly. These lists are available as handouts to anyone visiting the PMHA office and will be published on our website once the site is revised. The agency maintains a broad, county-wide listing of rental units through the Rent Reasonableness program and intends to upgrade this program through new software and the addition of additional data in 2011 and 2012.

PMHA is currently in year 3 of a 5 year Shelter Plus Care grant. This grant is administered in cooperation with our local Community Action Agency (PICCA). PMHA administers the housing component and PICCA provides the supportive service component of the program. To date, 18 chronically homeless, disabled applicants have received housing through this program. Program requirements include application to the Housing Choice Voucher program so that a more permanent housing option is possible for the future of these persons.

Additional, modern rental housing would be beneficial to the low income residents of the County. PMHA currently has plans to meet with Housing Consultants to review options for developing additional housing in the county, or to replace slum or blighted areas of existing housing. While City of Circleville officials are not open to the construction of additional housing in the county seat, the majority of applicants continue to originate from Circleville. Care must be given to ensure that additional housing would not contribute to blighting and vacancy issues for existing area landlords. Therefore replacement housing would possibly be more appealing to the city representatives. Housing development should also be considered for areas nearby the city and adjacent

to other populated areas of the county as many applicants express a desire to reside in more rural areas.

In an effort to meet the needs of the disabled, elderly population, Pickaway MHA is currently reviewing options related to the renovation of one or possibly two management properties for the purpose of eligibility in the Medicaid Assisted Living waiver program. This program allows persons who need assistance on a daily basis to remain in a residence rather than experiencing placement in a nursing care facility.

10.0 Additional Information

10.0(a) Progress in Meeting Mission and Goals

The Pickaway Metropolitan Housing Authority continues to strengthen the programs of the agency by promoting the mission of the agency. Our Family Self Sufficiency program, Shelter Plus Care Program and Public Housing program continue to grow and stabilize the lives of the participants enrolled therein by firm management of program expectations.

PMHA staff members serve on the Boards of the local Community Action Agency, Senior Center, Jobs & Family Planning Commission, Older Adult Advocacy Group, and Continuum of Care, and Pickaway County Summit on Aging. The agency works closely with Jobs & Family Services, Haven House and Adult Shelters, the local Veterans organizations, Southeastern Ohio Legal Aid and our local elected officials. We work hand-in-hand with local law enforcement agencies to eliminate drug use and sales in our neighborhoods and by our program participants. Pickaway County is experiencing a growing heroin problem, along with use of prescribed narcotics. The agency is often first to report a suspected problem in our housing.

PMHA recently experienced the filing of two Fair Housing claims against the agency. Both claims resulted in findings of No Probable Cause in favor of the agency, but the result has been an increase in our respect for and awareness of Fair Housing issues. As a result, we have increased training and discussion of these issues for our staff. We have also made physical improvements to our properties, and will focus a substantial portion of current Capital Fund monies on improving driveways and sidewalks to eliminate trip hazards on public housing property. We have also made improvements to our management properties by installing additional curb access at Louise Terrace, bringing the four accessible apartments at Eden Place up to current accessibility standards, and implementing improvements as the result of a 504 transition plan completed for Pickaway Terrace. A recent major renovation of Williamsport Terrace also resulted in compliance renovations to the accessible units at that apartment complex.

PMHA is also committed to improving energy related components of its program. We recently participated in a program sponsored by AEP resulting in replacement bulbs for all permanent fixtures in our public housing program residences serviced by AEP. We are replacing current HVAC units with energy efficient units as they need replaced, and are adding replacement of aging units as part of our future Capital Improvement plan. We also only purchase Energy Star appliances, and are replacing windows in the majority of our public housing units in the interest of efficiency.

10.0(b): Definitions of Significant Amendment and Substantial Deviation/Modification

In considering any significant amendment or modification to the Annual Plan or the Five Year Plan, the PMHA Board and Executive Director will seek the input and recommendations of the Resident Advisory Board, guarantee and receive certification that the amendment/modification is consistent with the local plans of both the City of Circleville and Pickaway County, conduct a public hearing, adopt the amendment/modification at a regularly scheduled meeting of the Board of Commissioners of the Agency, and submit the amendment/modification to HUD for approval.

Pickaway MHA currently uses a three level strategy to make changes in operating policies that would not be considered a Significant Amendment or Substantial Deviation/Modification to the Five Year Plan or Annual Plan. The staff initially meets to discuss the need for the change in policy. Statistics or data surrounding the change are reviewed and discussed in depth, and a recommendation is made and considered by the Program Coordinator, the Maintenance Supervisor if relevant, the Finance Director and the Executive Director. If it is determined that change to the current operating policy is necessary, that policy change is presented to the Board of Commissioners for review. The Board takes formal action on approval of the change at a regularly scheduled meeting of the Board. Tenants, landlords, or in any scenario, the affected party receives a 60 day notice of the change, prior to implementation.

A Significant Amendment or Substantial Deviation requiring modification to the Annual Plan or Five Year Plan includes consultation with the Resident Advisory Board, a public hearing, a review for consistency by local jurisdictions, and approval by HUD. These actions occur within the time frames established in the Annual Plan requirements. A Significant Amendment or Substantial Deviation would include changes to rent or admissions policies or organization of the waiting list outside of the normal course of doing business, such as the addition of a preference, a change in the use of replacement reserve funds under the Capital Fund, and any change to PMHA programs in regard to demolition or disposition, designation, homeownership programs, or conversion activities.

Advisory Board Meeting
July 6, 2011

The Pickaway Metropolitan Housing Authority Advisory Board met in previously scheduled session at the Pickaway MHA Office, 176 Rustic Drive; Circleville, Ohio 43113 on Wednesday, July 6, 2011 with the following members present: Lisa Binkley, Linda Nicklas, and Donna Hardy. Members Elizabeth Cottrill and Bernadette Hocking were not present.

The Board discussion focused on review of the 2012 Annual Plan. PMHA Director Kim Hartinger reviewed changes to the administration of agency programs since the submission of the previous Annual Plan. A review of planned Capital Improvements was also given.

Advisory Board members offered the following comments and suggestions:

- ✓ Inquiry was made concerning the feasibility of drug screens for all move-ins to both the Public Housing and Housing Choice Voucher recipients.
- ✓ Discussion was held on the Housing Choice Voucher shortfall resolution that would eliminate program participants on a first in/first out status
- ✓ Support was given for changes in maintenance response to work orders when children are present with no adult present, and the inclusion of door and lock repairs on the 24 hour repair list.
- ✓ Concern was expressed over funding reductions and the overall impact on program administration and property management.
- ✓ Discussion was held on past capital improvements and the plans for future capital improvements

Based on the information provided, Lisa Binkley offered the motion, seconded by Linda Nicklas to approve the Annual Plan as prepared by Pickaway MHA. A vote by all present affirmed the motion. There were no nay votes recorded.

Additional discussion was held on funding reductions and options for dealing with the reduction in administrative monies. Director Hartinger informed the Board that seven of the eleven office staff members, including the Executive Director and Finance Director have voiced their plans to retire within the next decade. Two employees with 50 years of experience will retire in the next two – to - four years, with the remaining staff leaving in succession. The goal of the agency had been to hire an administrative staff assistant in 2011. This person would work with all programs and staff members to learn the operation of PMHA from the “floor up” so that as staffing transitions take place, knowledgeable persons will be available to fill vacancies. Due to funding reductions, this position cannot be filled. Comparisons were made to current reductions in staff at Jobs & Family Services and Scioto Paint Valley Mental Health. JFS is losing 12 staff members as a result of retirement and resignation. Only 1 person will be replaced. SPVMH is seeing a 20% reduction in staff, with funding reductions resulting in reduced services to indigent persons. With the loss in experience of these public agencies, service to clientele is going to suffer greatly.

Director Hartinger also spent significant time explaining Fair Housing requirements to the Advisory Board. She outlined the training that PMHA staff undergoes in this area on an annual basis. To date, in 2011, the training includes subscription to the *Fair Housing Advisor* which each staff member is required to read, a Fair Housing Roundtable which was conducted by Attorney Bill Willis, and an overall staff Fair Housing Training which will be conducted in August, 2011. This training will be opened to the staffs of other community agencies, with the local community action organization and the Pickaway County Fair Housing Coordinator already indicating their intention to attend.

The Board was also informed that PMHA staff intends to dedicate the remainder of 2011 to revising and updating the Administrative Plan of the Housing Choice Voucher program and the Occupancy Policy of the Public Housing program. The Board will be contacted to review and comment on these revisions upon their completion.

Concerning appointments to the Board, both Lisa Binkley and Linda Nicklas consented to reappointment to another 2 year term on the Board.

There being no further business to come before the Board, Donna Hardy offered the motion to adjourn, seconded by Lisa Binkley. A vote by all present affirmed the motion. There were no nay votes recorded.

Annual Plan Hearing
Wednesday, August 3, 2011

The 2012 Annual Plan Hearing for the Pickaway Metropolitan Housing Authority was held, as publicly advertised, on Wednesday, August 3, 2011 at 10:00 a.m. in the Board Room of the Pickaway Metropolitan Housing Authority offices at 176 Rustic Drive in Circleville, Ohio.

Present for the hearing were Finance Director Rebecca Curtis, Program Coordinator Terri Straight, Program Assistants Rebecca Zielinski and Tammy McGlone, Shelter Plus Care Coordinator Lisa Robbins and Maintenance Supervisor Steven Dearth.

There was no public participation at the hearing. No written comments were received.

Executive Director Kim Hartinger reviewed the format and components of the plan. The 2012 document has been available for public review in the lobby of the PMHA office. The plan has also been available in the office of the Director. The 2012 Plan is an Annual Plan that includes updates based upon changes or amendments of PMHA policies.

The Annual Plan review consisted of discussion of the Plan contents. The staff was previously aware of these components and did not offer opposition on the policies reviewed.

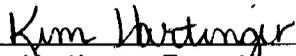
Director Hartinger reviewed for those present, all programs administered by PMHA and included in the discussion, the challenges facing the agency in the coming twelve months in light of proposed subsidy reductions. The goals and requirements established in the 2012 Annual Plan will be difficult to administratively manage if severe subsidy reductions are realized. The Pickaway MHA has always been a High Performing Agency and will continue to strive for this accomplishment.

Capital Improvements were discussed, with a new round of improvements scheduled to begin. Also reviewed were changes to current programs and the need to continually update all Policy and Procedure manuals when there is a change in agency policy.

Director Hartinger informed the staff of the Resident Advisory Board review of the Plan. The attendance of RAB members at meetings was discussed. The Director asked for the names of HCV participants who would be potential replacements for RAB members who do not attend scheduled meetings and who do not contact the office to report a conflict with a scheduled meeting.

The staff also reviewed the activities of the various Pickaway County boards and commissions of which staff are members as representatives of Pickaway MHA.

The Hearing concluded at 11:10 a.m.



Kim Hartinger, Executive Director
August 3, 2011

Commissioners

Glenn D. Reeser
Ula Jean Metzler
Jay H. Wippel

Administrator

Brad Lutz
Clerk
Patricia Webb

Pickaway County
Board of County Commissioners
139 West Franklin Street
Circleville, OH 43113
740-474-6093 Fax: 740-474-8988
1-800-472-6093

August 16, 2011

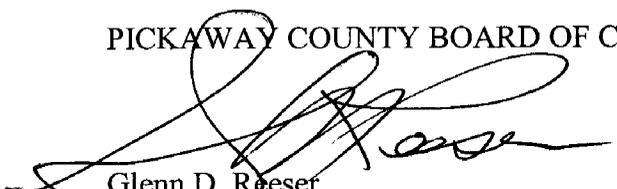
Pickaway Metropolitan Housing Authority
Mrs. Kim Hartinger, Executive Director
176 Rustic Drive
Circleville, Ohio 43113

Dear Mrs. Hartinger,

The Pickaway County Board of Commissioners has reviewed the Pickaway Metropolitan Housing Authority's 2012 Annual Plan and finds that it is consistent with the current Pickaway County Community Housing Improvement Strategy (CHIS).

Sincerely,

PICKAWAY COUNTY BOARD OF COMMISSIONERS


Glenn D. Reeser
President

SEP 2 '11 AM 11:32



City of Circleville

Mayor

Chuck Taylor

130 S. Court Street, Circleville, Ohio 43113
740/477-2551 fax 740/477-8247

September 1, 2011

Ms. Kim Hartinger, Executive Director
Pickaway Metropolitan Housing Authority
176 Rustic Drive
Circleville, OH 43113

Ms. Hartinger:

The City of Circleville has reviewed the Pickaway County Metropolitan Housing Authority's plan for 2012 and finds that it is consistent with the latest CHIS for the City of Circleville.

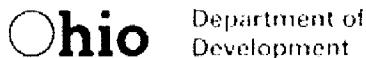
Sincerely,

David M. Crawford
Acting Mayor

Kim Hartinger

From: "Thomas, Ian" <Ian.Thomas@development.ohio.gov>
To: "Kim Hartinger" <khartinger@pickawaymha.com>
Sent: Monday, September 12, 2011 2:58 PM
Attach: Pickaway Con Plan Cert.pdf
Subject: RE: Emailing: Pickaway MHA 2012 Annual Plan001.pdf

Kim,
Attached is the Certification of Consistency with the State of Ohio Consolidated Plan that you requested. Please let me know if I can be of further assistance.
Thanks,
Ian



Ian Thomas
Planner 3
Housing and Community Partnerships Office

77 South High Street
Columbus, Ohio 43215
614.466.8744 F 614.752.4575

Ian.Thomas@development.ohio.gov

Information from the Ohio Department of Development is open to public inspection under Ohio's public record law. Unless the law exempts it, this e-mail and any response to it will be released if requested.

The State of Ohio is an Equal Opportunity Employer and Provider of ADA Services.

From: Kim Hartinger [mailto:khartinger@pickawaymha.com]
Sent: Monday, September 12, 2011 11:00 AM
To: Thomas, Ian
Subject: Emailing: Pickaway MHA 2012 Annual Plan001.pdf

Mr. Thomas:

Please find attached, the Pickaway MHA 2012 Annual Plan for review for compliance with the Consolidated Plan for the State of Ohio. I have only attached the portions of the plan that I felt would be relative to your review. I have not attached the approved State Audit, the EIV Policy or the Capital Fund programs that have an approved Cost Certification. If you need any of these documents, please do not hesitate to contact my office.

Upon your approval, our plan is ready for submission.

Thank you,

Kim Hartinger
Executive Director
Pickaway Metropolitan Housing Authority
176 Rustic Drive
Circleville, Ohio 43113
740-477-2514 (telephone)
740-477-7456 (fax)
khartinger@pickawaymha.com



**Department of
Development**

John R. Kasich, Governor

Christiane Schmenk, Director

September 12, 2011

Kim Hartinger, Executive Director
Pickaway Metropolitan Housing Authority
176 Rustic Drive
Circleville, Ohio 43113

Subject: Certification of Consistency with the State of Ohio's Consolidated Plan

Dear Ms. Hartinger:

Enclosed please find a certification that the 2012 Annual Plan for the Pickaway Metropolitan Housing Authority is consistent with the State of Ohio's Consolidated Plan.

If you have any questions or need further assistance, please contact me at (614) 466-2285.

Sincerely,

Ian Thomas, Planner
Office of Housing and Community Partnerships

Enclosure

77 South High Street
P.O. Box 1001
Columbus, Ohio 43216-1001 U.S.A. 614 | 466 2480
800 | 848 1300
www.development.ohio.gov

The State of Ohio is an Equal Opportunity Employer and Provider of ADA Services

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

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB# 2577-0226
Expires 06/30/2011

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

I, Michael A. Hiler, Chief, OHCP, Ohio Department of Development certify
that the Five-Year Plan and 2012 Annual PHA Plan of
the Pickaway Metropolitan Housing Authority is consistent with the Consolidated Plan
of the State of Ohio prepared pursuant to 24 CFR Part 91.

Michael A. Hiler

Date: September 12, 2011

Michael A. Hiler, Chief
Office of Housing and Community Partnerships
Ohio Department of Development

Resolution 11-22: Adoption of Agency Annual Plan

The Board of Commissioners of the Pickaway Metropolitan Housing Authority met in Regular Session at the office the Board, located at 176 Rustic Drive, Circleville, Ohio 43113 on Friday, August 12, 2011 with the following members present: Mr. Litzinger, Ms. Schieber, Ms. Peters, Mr. Shasteen and Ms. Yingling.

During business conducted while in session, Director Hartinger reviewed for the Board, the process involved in completion and submission of the Pickaway MHA Agency Plan. The Advisory Board has completed their review of the Plan and approved it for submission to HUD. A public hearing was conducted with no public participation. The agency staff present at the hearing did concur with the plan as written. Final steps will be to obtain PMHA Board approval, and compliance statements from the city, county and state. Once these are received, the 2012 Annual Plan can be submitted to HUD.

The Plan was previously submitted to the PMHA Board for their review and comment. A brief discussion was held on the contents of the Plan and the importance of Capital Fund allocations to the successful administration of the Pickaway MHA Public Housing program.

Based on the information provided, Ms. Peters offered the motion to adopt Resolution 11-22 as follows:

Whereas, Pickaway MHA is required to compose and submit an Annual Plan each year and a Five Year Plan every five years, and

Whereas, Pickaway MHA did submit a Five Year Plan in 2010, therefore requiring the submission of an Annual Plan only for FY 2012, and

Whereas, the 2012 Annual Plan has been prepared and submitted for review to the Pickaway MHA Board of Commissioners, the Pickaway MHA Resident Advisory Board, and will be submitted to the City of Circleville and the Pickaway County Commissioners, and the State of Ohio as required, and

Whereas, a Public Hearing was held on Wednesday, August 3, 2011 for the purpose of receiving and implementing public comment on the plan with no public participation or written comment received, then

Therefore Be It Resolved, that the Board of Commissioners of the Pickaway Metropolitan Housing Authority do hereby certify that said Pickaway Metropolitan Housing Authority will carry out the public housing program of the agency in conformity with Title VI of the Civil Rights Act of 1973, and Title II of the Americans with Disabilities Act of 1990, and will continue to affirmatively further Fair Housing, and

Be It Further Resolved, that the Board of Commissioners of the Pickaway Metropolitan Housing Authority do hereby approve the submission of the PMHA 2012 Annual Plan to the Ohio Department of Development for review, and upon approval, for subsequent submission to HUD, and

Be It Further Resolved, that the Board of Commissioners of the Pickaway Metropolitan Housing Authority do hereby authorize Chairman Dan Litzinger to sign HUD Form-50076 Certifying Compliance with the PHA Five Year and Annual Plan and Related Regulations.

Mr. Shasteen seconded the motion and a vote on the motion was as follows: Voting Yes: Ms. Schieber, Ms. Yingling, Mr. Shasteen, Ms. Peters, and Mr. Litzinger. Voting No: None. Motion carried.

Resolution 11-22 adopted.

**PHA Certifications of Compliance
with PHA Plans and Related
Regulations**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 06/30/2011

**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, 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.

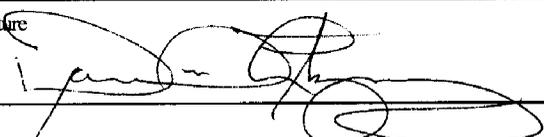
Pickaway Metropolitan Housing Authority
PHA Name

OH059
PHA Number/HA Code

5-Year PHA Plan for Fiscal Years 20 - 20

Annual PHA Plan for Fiscal Years 2012- 2013

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 Daniel Litzinger	Title Chairman, Board of Commissioners
Signature 	Date 8-12-2011

Certification for a Drug-Free Workplace

U.S. Department of Housing and Urban Development

Applicant Name

Pickaway Metropolitan Housing Authority

Program/Activity Receiving Federal Grant Funding

HUD Public Housing Capital Fund Grant

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.)

All work completed under AMP #OH059000001. Sites included in the Capital Fund improvement projects could be Lexington Avenue, Rich Street, Madison Street and Griggs Street in Ashville, Ohio 43103; School Street in Williamsport, Ohio 43164; Pontious Lane, Rustic Drive, Rustic Court, Barry Drive, Francene Court, Kingston Court, Washington Street, Logan Street, Meadow Drive and Walnut Street in Circleville, Ohio 43113. The Pickaway MHA office is located at 176 Rustic Drive; Circleville, Ohio 43113 with all employees and contracts administered at this site.

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

Kim Hartinger

Title

Executive Director

Signature

X *Kim Hartinger*

Date

9-12-2011

**Certification of Payments
to Influence Federal Transactions**

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

OMB Approval No. 2577-0157 (Exp. 01/31/2014)

Applicant Name

Pickaway Metropolitan Housing Authority

Program/Activity Receiving Federal Grant Funding

HUD Public Housing Capital Fund Grant

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 sub recipients 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)

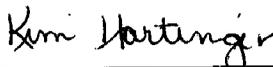
Name of Authorized Official

Kim Hartinger

Title

Executive Director

Signature



Date (mm/dd/yyyy)

09/12/2011

INSTRUCTIONS FOR COMPLETION OF SF-LLL, DISCLOSURE OF LOBBYING ACTIVITIES

This disclosure form shall be completed by the reporting entity, whether subawardee or prime Federal recipient, at the initiation or receipt of a covered Federal action, or a material change to a previous filing, pursuant to title 31 U.S.C. section 1352. The filing of a form is required for each payment or agreement to make payment to any lobbying entity for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with a covered Federal action. Use the SF-LLLA Continuation Sheet for additional information if the space on the form is inadequate. Complete all items that apply for both the initial filing and material change report. Refer to the implementing guidance published by the Office of Management and Budget for additional information.

1. Identify the type of covered Federal action for which lobbying activity is and/or has been secured to influence the outcome of a covered Federal action.
2. Identify the status of the covered Federal action.
3. Identify the appropriate classification of this report. If this is a followup report caused by a material change to the information previously reported, enter the year and quarter in which the change occurred. Enter the date of the last previously submitted report by this reporting entity for this covered Federal action.
4. Enter the full name, address, city, State and zip code of the reporting entity. Include Congressional District, if known. Check the appropriate classification of the reporting entity that designates if it is, or expects to be, a prime or subaward recipient. Identify the tier of the subawardee, e.g., the first subawardee of the prime is the 1st tier. Subawards include but are not limited to subcontracts, subgrants and contract awards under grants.
5. If the organization filing the report in item 4 checks "Subawardee," then enter the full name, address, city, State and zip code of the prime Federal recipient. Include Congressional District, if known.
6. Enter the name of the Federal agency making the award or loan commitment. Include at least one organizational level below agency name, if known. For example, Department of Transportation, United States Coast Guard.
7. Enter the Federal program name or description for the covered Federal action (item 1). If known, enter the full Catalog of Federal Domestic Assistance (CFDA) number for grants, cooperative agreements, loans, and loan commitments.
8. Enter the most appropriate Federal identifying number available for the Federal action identified in item 1 (e.g., Request for Proposal (RFP) number; Invitation for Bid (IFB) number; grant announcement number; the contract, grant, or loan award number; the application/proposal control number assigned by the Federal agency). Include prefixes, e.g., "RFP-DE-90-001."
9. For a covered Federal action where there has been an award or loan commitment by the Federal agency, enter the Federal amount of the award/loan commitment for the prime entity identified in item 4 or 5.
10. (a) Enter the full name, address, city, State and zip code of the lobbying entity engaged by the reporting entity identified in item 4 to influence the covered Federal action.

(b) Enter the full names of the individual(s) performing services, and include full address if different from 10 (a). Enter Last Name, First Name, and Middle Initial (MI).
11. Enter the amount of compensation paid or reasonably expected to be paid by the reporting entity (item 4) to the lobbying entity (item 10). Indicate whether the payment has been made (actual) or will be made (planned). Check all boxes that apply. If this is a material change report, enter the cumulative amount of payment made or planned to be made.
12. Check the appropriate box(es). Check all boxes that apply. If payment is made through an in-kind contribution, specify the nature and value of the in-kind payment.
13. Check the appropriate box(es). Check all boxes that apply. If other, specify nature.
14. Provide a specific and detailed description of the services that the lobbyist has performed, or will be expected to perform, and the date(s) of any services rendered. Include all preparatory and related activity, not just time spent in actual contact with Federal officials. Identify the Federal official(s) or employee(s) contacted or the officer(s), employee(s), or Member(s) of Congress that were contacted.
15. Check whether or not a SF-LLLA Continuation Sheet(s) is attached.
16. The certifying official shall sign and date the form, print his/her name, title, and telephone number.

According to the Paperwork Reduction Act, as amended, no persons are required to respond to a collection of information unless it displays a valid OMB Control Number. The valid OMB control number for this information collection is OMB No. 0348-0046. Public reporting burden for this collection of information is estimated to average 30 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0046), Washington, DC 20503.