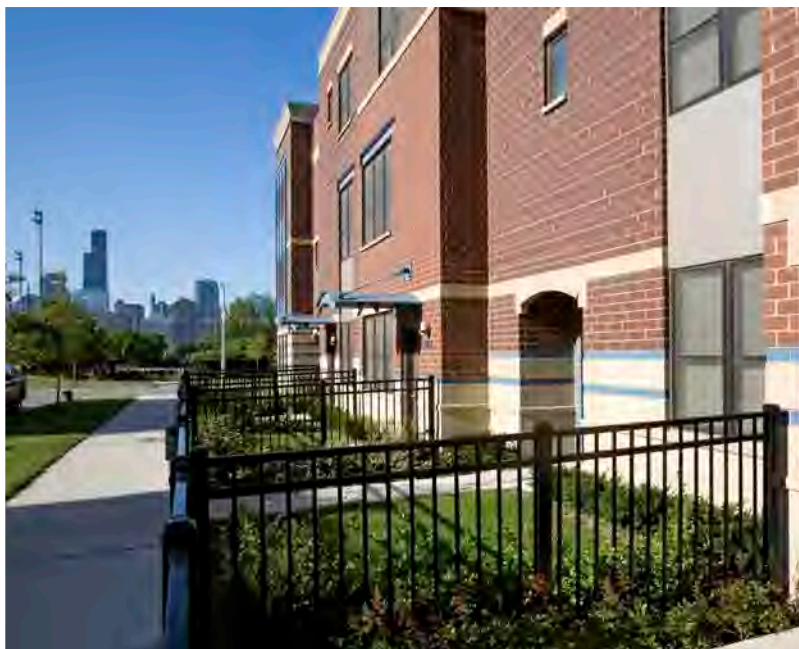




# AMENDED FY2017 MOVING TO WORK ANNUAL PLAN



Original Submission: October 18, 2016

Amended Plan Submission: August 25, 2017

## Message from CEO

I am pleased to present CHA's FY2017 MTW Annual Plan. As I complete my first full year as CEO, I continue to focus on enhancing the quality of life for CHA residents while accelerating the pace of development and supporting the improvement of our communities through CHA's investment in affordable housing.

The FY2017 MTW Annual Plan describes the ongoing activities authorized by the U.S. Department of Housing and Urban Development (HUD) through the Amended and Restated MTW Agreement, as well as proposed actions that require HUD approval. In FY2017 MTW Annual Plan, CHA is seeking approval from HUD for innovative MTW activities that support the three goals of the Moving to Work (MTW) agreement:

- To increase housing choices;
- To promote self-sufficiency; and,
- To achieve cost-effectiveness.

These innovative activities include making it easier for residents to enroll in Family Self Sufficiency programming, providing incentives to landlords in Opportunity Areas to provide voucher holders with greater access to the rental market and providing funding for supportive services for sponsor agencies in the sponsor-based voucher program to reduce barriers to our most vulnerable populations so they have access to the program.

CHA continues to pursue a variety of unit delivery strategies to achieve the original Plan for Transformation goal of rehabilitating or replacing 25,000 units of affordable housing in Chicago to fulfill the obligations of CHA's MTW Agreement with HUD. The FY2017 MTW Plan projects that CHA will deliver the remaining 1,596 units through a combination of real estate acquisitions, project-based vouchers and rehabbed and new construction public housing units.

The following are highlights of the 2017 Plan:

- Twenty-six public housing units will be completed at *Clybourn 1200*, a mixed-use, multi-family housing development that will include family residential units, a library, a community room, a community garden and approximately 17,000 square feet of commercial space. The development will consist of a seven-story, 84-unit rental building, including 26 public housing units, 16 affordable units and 42 market rate units. Of the public housing units, three will be fully accessible and four will be adaptable.
- CHA continues to work with stakeholders to finalize the master plan for the *Altgeld-Murray* community, including residential and community facility components, and to pursue the ongoing Section 106 historic preservation process. In FY2016, CHA completed the rehabilitation of 218 units in Blocks 7 and 8. Additionally, CHA received approval to demolish 182 units at Phillip Murray Homes and CHA plans to complete this activity by the first quarter 2017.
- Rehabilitation work at *Fannie Emanuel Senior Apartments* (formerly Parkview) will be completed in FY2017 and deliver all 181 units.
- In FY2015, CHA finalized a Development Zone Plan (DZP) for the remaining portions of *Cabrini-Green*, including Frances Cabrini Rowhouses, with the assistance of the City of Chicago's Department of Planning and Development, Chicago Park District, Chicago Department of Transportation, Chicago Public Schools, and the Near North Working Group. The DZP proposes preferred land uses including housing, retail, open space and other uses as well as reintegration of the street grid, which informs the solicitation of development proposals to occur in three phases. CHA plans to select development teams for the first phase of the DZP in

the 1<sup>st</sup> quarter of FY2017. CHA plans to release a solicitation for the next phase of the DZP by the second quarter 2017.

- Redevelopment of the *Horner Superblock* will transform the existing public housing property into a mixed income development with 200 total rental units, including 95 for public housing, 50 for affordable and 55 for market rate residents. Rehabilitation began in FY2016 and unit completion is expected in FY2018. The remaining 105 public housing units will be replaced through off-site acquisition or redevelopment.
- CHA remains committed to delivering 400 units of family public housing units onsite at Lathrop Homes through a combination of historically preserved housing, new housing, retail and other amenities in a mixed-income community. Redevelopment activities for the first phase will begin in 2017.
- In FY2017, a total of 10 major capital projects will continue or begin, with five of the 10 projects to be completed in FY2017. The planned capital projects include enhanced life safety features and mechanical system modernization at various senior buildings and renovations at scattered site properties.
- CHA plans to close the RAD transaction for 6418 N. Sheridan, which will deliver approximately 60 units of CHA housing in a mixed-use development. This development will be located on a portion of the Caroline Hedger Apartments site and when completed, will offer greater amenities to residents, including a grocery store. The new development will include ground-floor retail, including a Target department store, and up to 120 units of housing.

As we continue our work and strive to identify new and innovative strategies to expand housing opportunities, I would like to recognize the hard work of our partners in the public and private sector, including foundations, civic organizations, businesses, financial institutions, community organizations and government agencies. I am also grateful for the support and leadership of Mayor Rahm Emanuel and our Board of Commissioners, led by Chairman John T. Hooker.

Thank you for your time and interest as the agency works to strengthen Chicago neighborhoods and make them better places to live for our families.

Eugene Jones, Jr.  
Chief Executive Officer Chicago  
Housing Authority

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# Section One **INTRODUCTION**



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## **Section I: Introduction**

### **Overview of CHA's MTW Goals and Objectives**

Since 2000, CHA has been engaged in achieving the goals of the original Plan for Transformation: rehabilitate or redevelop 25,000 housing units in Chicago; reintegrate low-income families and housing into the larger physical, social and economic fabric of the city; provide opportunities and services to help residents improve their lives; and spur the revitalization of communities once dominated by CHA developments. CHA and HUD signed the original Moving To Work (MTW) Agreement on February 6, 2000 which allowed CHA to implement the original Plan for Transformation. CHA's Amended and Restated MTW Agreement with HUD was fully executed on June 26, 2008 which extended CHA's participation in the MTW Demonstration Program through FY2018.

In April 2013, Mayor Rahm Emanuel and CHA unveiled a new strategic plan, *Plan Forward: Communities that Work*, which outlines the agency's newly articulated mission and strategic goals that will guide CHA's work moving forward. The key goals of Plan Forward include completing the final phase of the original Plan and coordinating public and private investments to develop vibrant communities; ensuring CHA's housing portfolio is safe, decent and sustainable; and expanding targeted services to more residents at critical milestones in their lives. As CHA implements Plan Forward initiatives, the agency will continue to pursue the three statutory objectives of the MTW Demonstration Program:

- **MTW Statutory Objective I:** Increase housing choices for low-income families.
- **MTW Statutory Objective II:** Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
- **MTW Statutory Objective III:** Reduce costs and achieve greater cost effectiveness in federal expenditures.

As part of the MTW Agreement, CHA must submit an annual plan to HUD no later than 75 days prior to the start of the fiscal year. In May 2013, HUD issued a revised Form 50900 (Attachment B to the MTW Agreement) which outlines new requirements for the content of MTW annual plans/reports and for tracking the impact of MTW activities. CHA continues to work with HUD for technical guidance and feedback on MTW reporting processes and requirements to ensure compliance.

The following sections summarize CHA's key MTW goals and initiatives.

### **Key CHA Initiatives**

Throughout FY2017, CHA will continue to pursue and/or plan for future implementation of the following Plan Forward initiatives.

#### ***CHA Unit Delivery Strategy and Progress toward Goal of 25,000 Housing Units***

CHA continues to pursue a variety of unit delivery strategies to achieve the original Plan for Transformation goal of rehabilitating or replacing 25,000 units of affordable housing in Chicago and to fulfill the obligations of CHA's MTW Agreement with HUD.

- **Mixed-Income Redevelopment:** CHA will continue with new on- and off-site phases in mixed-income developments which have replaced many former CHA properties.

## Section II: General Housing Authority Operating Information

- **Real Estate Acquisition Program (REAP):** CHA launched a new strategy for acquisition of public housing units, primarily in opportunity areas. In addition, CHA released a Request for Qualifications (RFQ) to solicit a pool of developers interested in partnering with CHA.
- **Property Rental Assistance (PRA) Program:** CHA will continue to expand the existing PRA program to provide new project-based voucher units through multi-year contracts with private owners and developers.
- **Preservation Strategies:** CHA supports local preservation strategies through CHA's PRA Program. Specifically, this strategy applies to existing non-CHA properties with expiring affordability restrictions for which CHA can ensure long-term affordability through the use of project-based vouchers. Proposals are subject to CHA's standard PRA selection process.
- **Rehabilitation:** CHA plans to rehabilitate a portion of remaining offline units at Altgeld Gardens.
- **Choose To Own Homeownership Program:** CHA facilitates homeownership opportunities for CHA families through long-term subsidy commitments. CHA will request HUD approval to count these units toward the 25,000 goal.
- **Conversion of Moderate Rehabilitation Properties:** CHA is assessing existing privately-owned CHA Moderate Rehabilitation program properties to identify opportunities to transition these properties to the PRA Program through RAD conversion or the standard project-based voucher selection process.
- **Other Initiatives:** CHA continues to explore new unit delivery strategies to respond to local housing preferences and market opportunities.

During FY2017, CHA will continue to make progress toward the 25,000 unit goal of the original Plan. CHA plans to deliver an additional 1,596 housing units in FY2017, for an overall total of 25,000 housing units or 100% of the overall unit delivery goal. <sup>1</sup> (Please refer to Section II and IV for more information.)

**Projected FY2017 Unit Delivery**

IL Number	Type	Development/Program	Projected FY2017 Unit Delivery
IL002170000	Mixed-Income Housing Redevelopment	Clybourn 1200	26
IL002169000		St. Edmund's Oasis	19
IL002167000		Sterling Park Apartments	66
TBD	Public Housing Acquisition	Real Estate Acquisition Program (REAP)	785
N/A	Property Rental Assistance (PRA) Program	Project-Based Vouchers	425
N/A	Moderate Rehabilitation Conversions	Project-Based Vouchers	275
<b>Total Housing Units</b>			<b>1596</b>

<sup>1</sup> CHA's progress toward the 25,000 unit delivery goal is not the same as the total number of CHA public housing units, or the number of online public housing units. Public housing units renovated or redeveloped through the Plan ten to twelve years ago, though counted toward unit delivery progress, may now temporarily be offline for capital maintenance. Moreover, project-based vouchers (PBVs) administered through CHA's PRA Program are not CHA ACC/public housing units, but do provide needed affordable housing opportunities and are counted toward the overall goal of 25,000 revitalized housing units.

### ***Uniform Housing Policy***

Like most housing authorities, CHA administers two primary housing subsidy programs: the Public Housing and Housing Choice Voucher programs. While the programs are similar in several key aspects, the specific policies have evolved over time and differ in areas that lead to administrative inefficiencies and participant confusion. Another element of Plan Forward is to address these issues by creating a Uniform Housing Policy to establish a more consistent set of rules for all CHA-assisted housing. The Uniform Housing Policy will align requirements, standards, and processes for the two housing programs, including establishing consistent policies where possible, to streamline and clarify program administration and to make policies more user-friendly for participants. CHA will implement the Uniform Housing Policy through a multi-phased approach.

In FY2014, CHA moved forward with Phase 1 of Uniform Housing Policy, prioritizing policies that benefit participants and enhance consistency across programs. CHA received approval for several policies that require MTW authority, including expanding biennial recertification to public housing (which was previously approved for HCV), adopting triennial recertification for fixed-income households with only senior/disabled participants in public housing and HCV, and modifying “Choose to Own” homeownership and Family Self Sufficiency program requirements. In addition, CHA made changes to additional policies related to HCV unit inspection owner participation, clarification of waitlist priorities, clarification of definitions of absent participants, guests and unauthorized members, and adoption of smoke-free housing policies for all new properties. Updates to CHA’s Public Housing Admissions and Continued Occupancy Policy (ACOP), Public Housing Residential Lease and HCV Administrative Plan, based on Phase 1 of Uniform Housing Policy, were released for public comment in July 2014 and were approved by CHA’s Board in August 2014.

Implementation of Phase 1 is ongoing throughout FY2016 and will continue in FY2017. CHA continues to explore additional items for consideration in Phase 2 of Uniform Housing Policy and will request MTW approval as necessary.

### ***Rental Assistance Demonstration (RAD) Program***

In October 2013, CHA submitted a portfolio application to HUD to utilize RAD for approximately 46 public housing properties with 10,937 units. CHA plans to utilize RAD to refinance some properties and to support new initiatives that will expand affordable housing opportunities. More than 40 stakeholders, resident and community meetings were held prior to the application to educate people about the benefits of RAD and how it can be used to support long-term affordability.

In the submitted portfolio application, CHA elected to transition the proposed RAD units to the Project-Based Voucher (PBV) program. In anticipation of a potential future RAD award, CHA proceeded with required revisions to the annual plan through an amendment to the FY2014 MTW Annual Plan. In FY2014, CHA updated the HCV Administrative Plan to reflect RAD-specific policies, as well as created a RAD lease/lease addendum and RAD grievance policy. These RAD policies were released for public comment in November 2014 and approved by CHA’s Board in January 2015. As reflected in these policies, CHA will adhere to the regulations of the RAD program, including the incorporation of key public housing provisions that protect residents’ interests and encourage resident participation and self-sufficiency.

In June 2015, CHA received a RAD award for its portfolio application. CHA closed its first RAD financial transaction for Fannie Emanuel Senior Apartments in December 2015 and completed transactions for six additional properties in FY2016. In FY2017 and continuing into FY2018 (specifically for multi-phase developments), CHA will continue to move forward with RAD implementation for the entire portfolio application.

### Proposed MTW Activities in FY2017

In FY2017, CHA is proposing the following MTW activities.

#### ***Public Housing and Housing Choice Voucher Programs***

- Modified Family Self-Sufficiency Program for HCV and Public Housing (2014-01): CHA received approval in FY2014 to modify participation requirements for the Family Self-Sufficiency program for public housing and HCV participants to ensure participant success.

#### ***Housing Choice Voucher Program***

- Elimination of Assets in Income Calculation after Initial Eligibility for HCV Program (2017- 01): CHA proposes to reinstate this activity. Upon implementation, the calculation of assets will only be done at intake and is no longer necessary at re-examination.
- Incentive Payments for Landlords in CHA Opportunity Areas (2017- 02): CHA is proposing to provide a one-time incentive payment in the amount of the contract rent to landlords in any instance where an HCV participant is entering into a new lease for a unit located in an Opportunity Area.
- Time Limit Demonstration Program for Housing Choice Voucher Participants (2017- 03): CHA proposes to implement an eight-year time limit demonstration program for a total of 100 families.

#### ***Local Programs***

- Funding for City of Chicago Housing Assistance Programs (2017- 04): CHA proposes to implement program-based assistance to help families access and remain stably housed. Social services will be linked to the housing assistance to ensure that families achieve stability.

### Approved MTW Activities in FY2017

In FY2017, CHA will continue or proceed with implementation of the following approved MTW activities to provide more housing options for families, assist residents in achieving self-sufficiency, and increase the cost-effectiveness of public housing and Housing Choice Voucher program administration.

#### ***Housing/Development***

- Revitalization of 25,000 Housing Units (2000-01): CHA continues to make progress toward the goal of 25,000 housing units and providing additional housing opportunities for residents.
- Alternative Reasonable Cost Formula for Redevelopment and Rehabilitation (2010-01): CHA has authorization to utilize an alternate reasonable cost formula for both redevelopment and rehabilitation projects.
- Expedited Public Housing Acquisition Process (2015-01): CHA is authorized to use MTW flexibility to support CHA's Real Estate Acquisition Program and expedite the acquisition of units and/or buildings as public housing units.

#### ***Public Housing and Housing Choice Voucher Programs***

- \$75 Minimum Rent for Public Housing and HCV Programs (2009-01): CHA increased the minimum rent from \$50 to \$75 in FY2009 in public housing and HCV programs.

- Choose to Own Homeownership Program for HCV and Public Housing (2011-01): CHA expanded the HCV Choose to Own Homeownership Program to eligible current public housing residents. In FY2014, CHA received approval to modify program eligibility requirements to ensure participant success.
- Triennial Re-examinations for Households with Only Elderly/Disabled Participants for HCV and Public Housing (2014-02): CHA received HUD approval in FY2014 to implement a streamlined triennial re-examination schedule for public housing and HCV fixed income households consisting of only disabled and/or elderly participants.
- CHA Re-entry Pilot Program (2014-04): CHA is implementing a Re-entry Pilot Program for up to 50 eligible participants who are reuniting with a family member currently living in CHA traditional public housing or CHA's HCV Program or for eligible participants currently on a CHA wait list.
- Mobility Counseling Demonstration Program Work Requirement (2016-01): CHA will implement a work requirement for applicants who consent to participation in the Mobility Counseling Demonstration Program and move to either a CHA Opportunity or Gautreaux-designated General Area utilizing a tenant-based Housing Choice Voucher.
- Biennial Re-examinations for Public Housing and HCV (2014-03) and (2006-01): CHA will implement biennial re-examinations for public housing in FY2017 and continue to conduct biennial re-examinations for public housing households.

### ***Public Housing***

- Public Housing Work Requirement (2009-02): Through the implementation of a work requirement across CHA's public housing portfolio, more residents are engaged in employment, education, job training, and community service in order to achieve goals for self-sufficiency. CHA provides case management and workforce development resources to residents to assist them in fulfilling this requirement.
- Office of the Ombudsman (2008-01): The Office of the Ombudsman provides designated staff to address the concerns of public housing residents living in mixed-income communities and serves as a liaison between residents and CHA leadership. The office assists residents in resolving issues and adapting to their new community.

### ***Housing Choice Voucher Program***

- Exception Payment Standards (2010-02): CHA is authorized to implement exception payment standards that exceed the standard limit of 110% of HUD's published Fair Market Rents (FMRs) for the City of Chicago. In FY2014, CHA lowered the limit for exception payment standards to no more than 150% of HUD FMR for all new requests with phase out of existing exception payments that exceed 150% over a three-year period.
- Owner Excellence - Acceptance of Passed Annual or Initial HQS Inspection for New Request for Tenancy Approval within 90 Days of Passed Date (2011-02): CHA is authorized to approve tenancy for a unit that passed inspection within the previous 90 calendar days without conducting a new inspection for each Request for Tenancy Approval (RTA) received.

- HCV Vacancy Payments (2011-03): As part of the HCV Owner Excellence Program, CHA may provide a modest vacancy payment to eligible owners participating in the Owner Excellence Program who re-lease an eligible unit currently in the HCV program to another HCV participant.

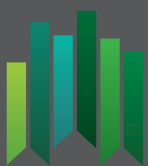
***Property Rental Assistance Program/Project-Based Vouchers***

- Exceed the Limit of 25% Project-Based Voucher (PBV) Assistance in Family Properties (2008-02): CHA may increase the percent of assisted PBV units in certain projects above the regulatory limit of 25% per family building.
- PBV Contract Commitments with 16-30 Year Initial Terms (2011-05): To facilitate the expansion of affordable housing opportunities through the use of PBVs, CHA uses MTW authority to enter into HAP contracts for initial terms between 16 and 30 years.
- Acceptance of City Certificates of Occupancy for Initial PRA Inspections (2011-06): CHA is authorized to accept the issuance of a Certificate of Occupancy by the City of Chicago as evidence of the property's compliance with Housing Quality Standards for initial PRA inspections.
- Payments during Initial Occupancy/Leasing – New Construction and Substantially Rehabilitated Properties (2011-08): CHA provides vacancy payments, as determined necessary on a project by project basis, during the initial operating lease-up period in order to provide an incentive for owner participation and to ensure the long-term viability of newly constructed and substantially rehabilitated properties.
- Expansion of Public Housing Earned Income Disallowance Policy to CHA PBV Properties within the RAD Program (2016-03): Pending HUD approval of the FY2016 MTW Annual Plan Amendment, CHA will retain the public housing EID policy for residents in properties transitioning to RAD PBV.
- Uniform Physical Conditions Standards (UPCS) Inspection Standards for PBV Properties within the RAD Program (2016-04): Pending HUD approval of the FY2016 MTW Annual Plan Amendment, CHA will continue utilizing UPSC for inspections in properties transitioning to RAD PBV.
- Adjusting Fair Market Rent (FMR) Thresholds to Retain Existing Subsidy Levels for Select PBV Properties (2016-05): Pending HUD approval of the FY2016 MTW Annual Plan Amendment, CHA may exceed the FMR cap of 110% for RAD PBV properties, as needed, to retain existing subsidy levels.

Finally, in FY2017, CHA will continue to utilize the single fund budget provided through MTW participation for expanded and flexible resources for overall administration of housing assistance, capital and redevelopment activities, and services and programs for residents. *(Please refer to Section V for more info.)*

# 2

## Section Two **GENERAL HOUSING AUTHORITY OPERATING INFORMATION**



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**Section II: General Housing Authority Operating Information**

This section contains General Housing Authority Operating Information for CHA's public housing portfolio and Housing Choice Voucher (HCV) Program, including Housing Stock, Leasing, and Wait List information.

**Section II-A: Housing Stock Information****Planned New Public Housing in FY2017**

The following table summarizes planned new public housing units in FY2017.

**Planned New Public Housing Units to be Added During FY2017**

AMP Name and Number	Bedroom Size							Total Units	Population Type	Fully Accessible	Adaptable
	0	1	2	3	4	5	6 +				
IL002170000 Clybourn 1200	0	9	16	1	0	0	0	26	General	5	4
IL002169000 St. Edmund's Oasis	0	2	6	10	1	0	0	19	General	1	4
IL002167000 Sterling Park Apartments	0	24	31	9	2	0	0	66	General	3	13
AMP - TBD Real Estate Acquisition Program (REAP)	0	314	314	157	0	0	0	785	General	31	126
<b>Total Public Housing Units to be Added</b>								<b>896</b>			

***Overview of New Public Housing Units in FY2017*****Clybourn 1200 (IL002165000)**

In FY2017, 26 public housing units will be completed at Clybourn 1200, a mixed-use, multi-family housing development consisting of family residential units, a library, a community room, a community garden and approximately 17,000 square feet of commercial space. The development will consist of a seven-story, 84-unit rental building, including 26 public housing units, 16 affordable units and 42 market rate units. Of the public housing units, three will be fully accessible and four will be adaptable.

**St. Edmund's Oasis (IL002169000)**

In FY2017, 19 public housing units will be completed at St. Edmund's Oasis, as part of replacement housing for the Washington Park community. This mixed-income site contains 58 rental units, including 19 public housing and 39 affordable units on four separate parcels of land donated by the City of Chicago. Of the 19 public housing units, one will be fully accessible and four will be adaptable.

**Sterling Park Apartments (IL002167000)**

In FY2017, CHA and Mercy Housing Lakefront plan to complete 66 public housing units through the redevelopment of Sterling Park Apartments, which includes adaptive reuse and historic rehabilitation of a vacated masonry industrial building located at 3333 W. Arthington Avenue in the North Lawndale Community. Mercy Housing Lakefront is developing 181 rental units, including 66 public housing units and 115 affordable units. The public housing units will include three apartments that are fully accessible and 13 that are adaptable.

**Real Estate Acquisition Program Unit Delivery in FY2017**

CHA launched the Real Estate Acquisition Program (REAP) in FY2013 as a strategy for offsite acquisitions of public housing units using traditional real estate acquisition processes primarily in CHA-designated opportunity areas. Public housing units acquired through this program will be counted toward the overall unit delivery progress once they become available for occupancy. CHA projects 785 new public housing units through REAP in FY2017.

**Dwelling Demolition**

CHA is considering the following demolition activity for FY2017. Other demolition activity previously proposed in annual plans may be carried out in FY2017.

**Frances Cabrini Rowhouses**

In FY2015, CHA finalized a Development Zone Plan (DZP) for the remaining portions of Cabrini-Green, with the assistance of the City of Chicago's Department of Planning and Development, Chicago Park District, Chicago Department of Transportation, Chicago Public Schools, and the Near North Working Group. The DZP proposes preferred land uses including housing, retail, open space and other uses as well as reintegration of the street grid, which informs the solicitation of development proposals to occur in three phases. CHA plans to select development teams for the first phase of the DZP in first quarter FY2017. In FY2017, CHA plans to issue a solicitation for a developer for the Frances Cabrini Rowhouses in compliance with an existing Memorandum of Agreement and Court Order regarding development of this site. The CHA has included the 440 offline units at the Frances Cabrini Rowhouses in this proposed demolition plan, in the event the development process results in a decision/need to demolish any or all offline units at the Frances Cabrini Rowhouses in FY2017.

**Scattered Sites**

CHA is proposing the demolition of two vacant scattered site properties for which the costs to rehabilitate will exceed current limits. These properties will be demolished and rebuilt.

**Planned Public Housing Units to be Removed During FY2017**

<b>PIC Dev. # / AMP and PIC Dev. Name</b>	<b>Number of Units to be Removed</b>	<b>Explanation for Removal</b>
IL002032000 Scattered Sites North East	2	The property at 736 N. Throop Street was assessed for rehabilitation, but the costs to return units to viability exceed current limits. This property is located in an opportunity area, and CHA plans to demolish and rebuild in FY2017.
IL002157000 PII North	1	The property at 2956 N. Oak Park Avenue was assessed for rehabilitation but the costs to return

## Section II: General Housing Authority Operating Information

		units to viability exceed current limits. This property is located in an opportunity area, and CHA plans to demolish and rebuild in FY2017.
IL002091000	440	In FY2017, CHA plans to issue a solicitation for a developer for the Frances Cabrini Rowhouses in compliance with an existing Memorandum of Agreement and Court Order regarding development of this site. The CHA has included the 440 offline units at the Frances Cabrini Rowhouses in this proposed demolition plan, in the event the development process results in a decision/need to demolish any or all offline units at the Frances Cabrini Rowhouses in FY2017.
<b>Total Number of Units to be Removed</b>	<b>443</b>	

### ***Non-Dwelling Demolition***

CHA plans to demolish a vacant non-residential building located on Hudson Avenue between Locust Street and Chestnut Street at the Cabrini Rowhomes.

Planned Non-Dwelling Units to be Removed During FY2017		
PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
	1	CHA plans to demolish a vacant non-residential building located on Hudson Avenue between Locust Street and Chestnut Street at the Cabrini Rowhomes.
<b>Total Number of Units to be Removed</b>	<b>1</b>	

### **Project-Based Voucher Utilization in FY2017**

CHA has continued to expand the use of project-based vouchers (PBVs) since FY2001 to increase housing options for low-income families in the region. PBVs are issued directly to property owners, unlike tenant-based vouchers, and remain with the unit if a tenant moves out. CHA anticipates that 4,506 PBVs will be utilized in properties with units under either Housing Assistance Payment (HAP) contracts or an Agreement to Enter into a Housing Assistance Payment (AHAP) by the end of FY2017. This includes 44,290 total PBV units under HAP contract and 261 under AHAP.

***New Housing Choice Vouchers to be Project-Based in FY2017***

The following table provides an overview of new project-based vouchers planned to be under HAP in FY2017.

Property Name	FY2017 Anticipated Number of New Vouchers to be Project-Based	Description of Project
The Carling Hotel	39	Substantial rehab for supportive housing in Near North for individuals.
Xavier Apartments	4	New construction housing in Near North for families.
Renaissance West	99	Existing occupied supportive housing for individuals and families in Logan Square
Lyndale Place	43	Existing occupied housing for individuals and families in West Logan Square.
Additional PRA/PBV - TBD	240	PRA has an open application process and proposals are anticipated in general and opportunity areas.
Crestwood Apartments (Mod Rehab Conversion)	57	Existing occupied senior housing in Austin converting from Mod Rehab to long-term RAD PRA.
Deborah's Place (Mod Rehab Conversion)	90	Existing occupied supportive housing for individuals in East Garfield converting from Mod Rehab to long-term RAD PRA.
Mod Rehab Conversions – TBD	128	Two conversion properties (1 senior and 1 family housing) have been identified in the Kenwood and South Chicago communities.
<b>Anticipated Total New Vouchers to be Project-Based</b>	<b>700</b>	
<b>Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year (Includes HAP/AHAP and city-state units)*</b>		<b>4,506</b>
<b>Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year*</b>		<b>4,290</b>

Throughout FY2017, CHA will continue to expand high-quality affordable housing opportunities in healthy and revitalizing neighborhoods in Chicago for families and individuals on CHA's waiting lists by providing PBV rental subsidies to additional units under the PRA program. CHA will continue to market the PRA program to developers and building owners through the ongoing solicitation and continue to accept applications on a rolling basis throughout the year.

The following section provides an overview of CHA's project-based voucher initiatives through the Property Rental Assistance (PRA) Program.

**City/State PBVs**

CHA continues to administer 341 project-based units across three city-state sites under HAP contracts with HUD: Harrison Courts, Loomis Courts, and Lathrop Elderly. These 341 units are located in Chicago and counted toward overall unit delivery progress.

### PRA Supportive Housing

Through the PRA Program, CHA provides supportive housing units through partnerships with developers/owners and service providers who provide affordable housing for families and individuals in need of comprehensive supportive services. Target populations include those who are homeless or at risk of becoming homeless, those facing serious persistent life challenges such as HIV/AIDS, mental illness, alcohol/substance abuse, veterans in need of supportive services, young single parents and persons with physical and/or developmental disabilities.

In FY2017, CHA expects an additional 138 new supportive PBV units under HAP contracts to be counted toward unit delivery. By the end of FY2017, CHA anticipates a total of 1,537 supportive housing (non-RHI) PBV units counted toward overall unit delivery.

### Family & Senior (Non-supportive) PRA Housing

CHA provides high-quality affordable housing opportunities to families, seniors and individuals on CHA's waiting lists by providing PBV rental subsidies in non-supportive housing properties under the PRA program. This category also includes unit delivery Preservation Strategies for existing non-CHA properties with expiring affordability restrictions. Through this strategy, CHA will review proposals received through the standard PRA selection process and, if selected, CHA would ensure long-term affordability through the use of project-based vouchers.

In FY2017, 47 non-supportive family/senior PBV units are expected to be placed under HAP contracts to be counted toward unit delivery with an additional 240 PBV units to be identified and committed during the year and put under AHAP / HAP contracts. CHA anticipates total of 2,284 non-supportive family/senior housing (non-RHI) PBV units counted toward overall unit delivery by the end of FY2017.

### Regional Housing Initiative

The Regional Housing Initiative (RHI), formed in 2002, is a consortium of regional housing authorities that have pooled project-based vouchers to allocate to competitively selected developments in each housing authority's jurisdiction. Through RHI, property rental assistance is awarded to developers committed to preserving and/or increasing the supply of affordable rental housing and expanding affordable housing options located near employment centers and/or public transportation providing easy access to employment opportunities. RHI is staffed by the Metropolitan Planning Council (MPC) and works closely with the Illinois Housing Development Authority (IHDA) when reviewing applications that are being considered by IHDA for Low Income Housing Tax Credits.<sup>[1]</sup>

In FY2012, HUD provided \$1 million to fund a three-year pilot program to expand RHI's capacity to increase quality affordable housing options throughout the region near jobs, transit, schools, shopping and other key neighborhood amenities for eligible families on the participating PHAs waiting lists. Under the Pilot, a central referral system was established that consists of applicants from each PHA's existing waiting lists who expressed interest in moving to other geographic areas throughout the region. To date, CHA has provided 350 Housing Choice Vouchers to RHI which are pooled for the overall initiative (540 vouchers are available in total through RHI). In FY2017, CHA will to maintain its participation in the RHI Pilot Program in order to offer applicants on CHA's wait list broader housing alternatives in opportunity areas.

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<sup>[1]</sup> For more information on RHI, see MPC's website at [www.metroplanning.org](http://www.metroplanning.org).

By the end of FY2017, a total of 279 CHA PBV units are expected to be under HAP contracts in the region through RHI. Of these, 69 are under contract in Chicago and are counted toward unit delivery progress.

**Moderate Rehabilitation Transition to PRA/PBV**

CHA has approximately 1,300 units in its Moderate Rehabilitation (Mod Rehab) portfolio. Mod Rehab, similar to PRA, provides property-based rental assistance to almost 1,300 low-income households but is governed by separate regulations and these Mod Rehab units are not available to CHA wait list applicants. CHA plans to work with their properties from the Mod Rehab program to the CHA's PRA/PBV portfolio either through RAD conversions or the standard PRA/PBV selection process.

In FY2017, CHA anticipates a total of 275 new PBVs through Mod Rehab conversions. This includes 147 units that will transition to RAD II (at Deborah's Place and Crestwood Apartments), and 128 units in two other projects anticipated for conversion.

**Summary of PRA/PBV Units Counted Toward Overall Unit Delivery Progress**

In FY2017, CHA projects a total of 700 new PBV units under HAP contracts in Chicago to be counted toward unit delivery, including 138 supportive housing units, 47 non-supportive family/senior housing units, 275 PBV units through Mod Rehab conversions and 240 additional PBV units to be determined. By the end of FY2017, CHA expects to have a total of 4,506 PBV units in Chicago counted toward unit delivery progress.

**Other Changes to the Housing Stock Planned in FY2017**

The following section describes planned changes to CHA's housing stock during FY2017 by category, including Disposition Activity, Long-term Plan for Offline Units, Additional Capital Maintenance Activity and Additional Redevelopment Activity.

Other Changes to the Housing Stock Planned in FY2017	
<p><b><i>Planned Disposition Activity</i></b> CHA plans to dispose of vacant land for future redevelopment for the ABLA, Caroline Hedger Apartments, the Former Lawndale Complex, Former Stateway Gardens, Former Robert Taylor Homes, three scattered sites a vacant non-residential property in the Washington Park community, and vacant land at 6531 S. University and 6508 S. Greenwood.</p>	
<p><b><i>Long-term Plan for Offline Units Status</i></b> As of 2<sup>nd</sup> quarter 2016, CHA has 2,942 public housing units across several categories that are currently offline and unavailable for occupancy for HUD-approved reasons. In coordination with HUD, CHA continues to prioritize reducing the number of offline units and making additional units available for occupancy as soon as possible.</p>	
<p><b><i>Additional Planned Capital Maintenance Activity</i></b> CHA will continue or begin various capital maintenance projects in FY2017.</p>	
<p><b><i>Additional Planned Redevelopment Activity</i></b> CHA will continue redevelopment planning at several sites and anticipates several financial transaction closings in FY2017.</p>	

***Planned Disposition Activity***

The following disposition activity is planned for FY2017. Other disposition activity previously included and approved in annual plans may also be carried out in FY2017.

## Section II: General Housing Authority Operating Information

IL Number	Developme nt/Site	Northern Boundary	Southern Boundary	Eastern Boundary	Western Boundary	Type of Disposition	Description of FY2017 Activity
IL002001000	ABLA	Washburne	14 <sup>th</sup> Street	Blue Island	Racine	Ground Lease and/or Fee Simple	In FY2017, CHA plans to ground lease or sell land for the development of mixed income housing, retail, community center or other land uses. CHA plans to submit the disposition application to HUD in FY2017.
IL002076000	Caroline Hedger Apartments	½ block south of W. Arthur Ave.	W. Devon Ave.	N. Sheridan Rd.	N. Magnolia Ave./alley	Ground Lease and/or Fee Simple	In FY2017, CHA plans to ground lease or sell land for the development of mixed income housing, retail or other land uses.
TBD	Former Lawndale Complex	12 <sup>th</sup> Place	13 <sup>th</sup> Place	Talman Avenue	Washtena w Avenue	Ground Lease and/or Fee Simple	In FY2017, CHA plans to ground lease or sell land for the development of mixed income housing, retail or other land uses. CHA plans to submit the disposition application to HUD in FY2017.
TBD	Former Stateway Gardens	35 <sup>th</sup> Street	35 <sup>th</sup> Place	Dearborn	Metra Railroad/F ederal Street	Ground Lease and/or Fee Simple	In FY2017, CHA plans to ground lease or sell land for the development of mixed income housing, retail or other land uses. CHA plans to submit the disposition application to HUD in FY2017.
IL002037000	Former Robert Taylor Homes	43 <sup>th</sup> Street	55 <sup>th</sup> Street	State Street	Metra Railroad/F ederal Street	Ground Lease and/or Fee Simple	In FY2017, CHA plans to dispose of land for the Legends South for-sale development. CHA plans to submit the disposition application to HUD in FY2017
IL002031000	Scattered Sites North Central	625 N. Springfield				Fee Simple	CHA plans for the disposition of a vacant 1-unit building. Rehabilitation costs would exceed current limits. The building is adjacent to numerous vacant properties and is not located in a CHA opportunity area.

## Section II: General Housing Authority Operating Information

IL002035000	Scattered Sites West	6442 S. Eggleston	Fee Simple	CHA plans for the disposition of a vacant 3-unit building. Rehabilitation costs would exceed current limits. The building is adjacent to numerous vacant properties and is not located in a CHA opportunity area.
IL002033000	Scattered Sites South East	7236 S. Emerald	Fee Simple	CHA plans for the disposition of a vacant 1-unit building. Rehabilitation costs would exceed current limits. The building is adjacent to numerous vacant properties and is not located in a CHA opportunity area.
N/A	Washington Park	6245 S. Wabash	Ground Lease and/or Fee Simple	In FY2017, CHA plans to dispose of a vacant non-residential property. The non-residential building situated on this property is currently vacant
N/A	Scattered Sites Southeast	6508 S. Greenwood	Negotiated Sale	CHA plans for the disposition of vacant land. The property is excess to CHA's needs for this area.
N/A	Keystone Place	6531 S. University	Negotiated Sale	CHA plans for the disposition of vacant land. The property is excess to CHA's needs for this area.

### ***Long Term Plan for Offline Units Status***

As of 2<sup>nd</sup> quarter 2016, CHA has 2,942 public housing units across several categories that are currently offline and unavailable for occupancy for HUD-approved reasons. In coordination with HUD, CHA continues to prioritize reducing the number of offline units and making additional units available for occupancy as soon as possible. CHA also provides quarterly status updates directly to HUD and publicly through CHA's website. The following is a summary and status of CHA's long-term strategies to address offline units by category as of the end of 2<sup>nd</sup> quarter of 2016.

### **Units pending redevelopment/planning**

A significant number of units are offline due to pending redevelopment plans, primarily at Altgeld Gardens/Murray Homes, Frances Cabrini Rowhouses and Lathrop Homes. CHA is moving forward to expedite the finalization of plans to the extent possible given community planning processes and key stakeholder input.

### ***Altgeld Gardens/Phillip Murray – 466 offline units (IL002002000)***

CHA continues to work with stakeholders to finalize the master plan for the Altgeld-Murray community, including residential and community facility components, and to pursue the ongoing Section 106 historic preservation process. In FY2016, CHA completed the rehabilitation of 218 units in Blocks 7 and 8. Additionally, CHA received

approval to demolish 182 units at Phillip Murray Homes. CHA plans to complete this activity by the first quarter 2017. Moreover, CHA seeks to demolish units in Blocks 11, 12, and 13 of Altgeld Gardens pending HUD approval and the environmental assessment process.

*Fannie Emanuel Senior Apartments (Parkview) – 181 offline units (IL002065000)*

In FY2015, CHA was awarded assistance to redevelop Fannie Emanuel Senior Apartments (formerly Parkview). The CHA, acting as the master developer for this development project, closed the transaction to provide 100% low-income housing for seniors at the property. Rehabilitation work will be completed in FY2017 and deliver all 181 units.

*Frances Cabrini Rowhouses – 438 offline units (IL002089000)*

In FY2015, CHA finalized a Development Zone Plan (DZP) for the remaining portions of Cabrini-Green, including Frances Cabrini Rowhouses, with the assistance of the City of Chicago's Department of Planning and Development, Chicago Park District, Chicago Department of Transportation, Chicago Public Schools, and the Near North Working Group. The DZP proposes preferred land uses including housing, retail, open space and other uses as well as reintegration of the street grid, which informs the solicitation of development proposals to occur in three phases. CHA plans to select development teams for the first phase of the DZP in the first quarter of FY2017. CHA plans to release a solicitation for the next phase of the DZP by the second quarter of FY2017.

*Henry Horner Superblock – 106 offline units (IL002093000)*

Redevelopment of the Horner Superblock will transform the existing public housing property into a mixed income development with 200 total rental units, including 95 for public housing, 50 for affordable and 55 for market rate residents. Rehabilitation began in FY2016 and unit completion is expected in FY2018. The remaining 106 public housing units will be replaced through off-site acquisition or redevelopment.

*Lathrop Homes – 753 offline units (IL002022000)*

CHA remains committed to delivering 400 units of family public housing units onsite at Lathrop Homes through a combination of historically preserved housing, new housing, retail and other amenities in a mixed-income community. In FY2017, rehabilitation activities will begin for the first phase of development at Lathrop Homes.

Units undergoing capital maintenance

This category includes units held offline for ongoing and upcoming maintenance or extensive rehabilitation work across CHA's portfolio. As part of CHA's strategy to modernize, maintain and preserve its existing housing stock and ensure compliance with all regulatory and safety requirements, CHA is making strategic investments at several priority properties. These capital investments require that some units in occupied buildings be vacated for construction to occur; however, CHA has committed to holding only the minimum number of units offline for the duration of construction projects and resuming leasing as soon as feasible when units are completed. While CHA will hold only the minimum number of units offline for construction, major capital projects at larger sites consist of rolling rehabilitation of units and the number of offline units will fluctuate until all current residents in specific properties are housed in newly rehabilitated units.

In FY2017, a total of ten major capital projects will continue or begin, with five of the ten projects to be completed in FY2017. The following is a summary of major capital projects for FY2017.

<b>FY2017 Major Capital Projects</b>
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## Section II: General Housing Authority Operating Information

IL Number	Project/Site	Construction Start	Units Back Online/Available for Leasing	Project Description
IL002078000	Minnie Riperton Apartments	May 2014	June 2017	Enhanced new life safety features (sprinklers, elevator controls and interior cameras), replacement of plumbing risers, kitchens, and baths
IL002076000	Caroline Hedger	July 2014	July 2017	Enhanced new life safety features (sprinklers, elevator controls and interior cameras), replacement of plumbing risers, kitchens, baths, and window replacement
IL002065000	Fannie Emanuel	December 2015	September 2017	RAD conversion including mechanical, electrical, plumbing, and/or envelope improvements
Various	General Renovation of Scattered Sites Units	Various	Various	Varies per site; generally complete renovation including upgrades, full replacements or repairs to plumbing and electrical infrastructure, exterior envelope restorations, windows, roofs and site work
IL002052000, IL002052100	Lincoln Perry Apartments/Annex	January 2017	December 2017	Mechanical system modernization; Enhanced new life safety features
IL002057000	Judge Fisher Apartments	October 2016	August 2017	Replacement of remaining roof systems and exterior envelope repairs
IL002046000	Armour Square Apartments	May 2017	September 2019	RAD conversion including mechanical, electrical, plumbing, and/or envelope improvements
IL002061000	Albany Terrace Apartments	May 2017	September 2019	RAD conversion including mechanical, electrical, plumbing, and/or envelope improvements
IL002044000	Thomas F. Flannery Apartments	May 2017	September 2019	RAD conversion including mechanical, electrical, plumbing, and/or envelope improvements
IL002062000	Irene McCoy Gaines	May 2017	September 2019	RAD conversion including mechanical, electrical, plumbing, and/or envelope improvements

#### Units pending demolition/disposition

Units in this category are pending demolition or disposition and will not come back online. As of the 2<sup>nd</sup> quarter of FY2016, there are 234 units in the approved “demo/dispo” category in PIC. 41 units are pending disposition for the creation of the National Public Housing Museum. Five (5) Scattered Site units are pending an assessment to determine demolition status and six (6) Scattered Site units will be removed from PIC in 3<sup>rd</sup> quarter 2016. 182 units are pending HUD approval for the demolition of Altgeld Blocks 11, 12, 13. CHA anticipates finalizing disposition activity and removing the units from inventory in FY2016.

Units used for non-dwelling purposes

As of 2nd quarter of FY2016, CHA currently uses only 242 units for non-dwelling purposes. CHA continues to evaluate non-dwelling use of units across its portfolio.

***Additional Planned Capital Maintenance Activity in FY2017***

CHA will continue or begin the following projects in FY2017:

- Continue amenity improvements at various senior buildings including improvements to exterior grounds and entryways, selective replacement of kitchen appliances, upgraded finishes in common areas and renovations to common laundry areas.
- Full structural repairs to Armour Square Apartments, Albany Terrace Apartments and the Thomas F. Flannery Apartments.
- Conversion of existing Pope Elementary School into CHA office space and housing.
- Demolition of Blocks 11, 12 & 13 in Altgeld/Murray Homes community.
- Renovations to the Gautreaux Child Care Center, Carver Park Field House and CYC Building within the Altgeld Murray Homes community.
- Renovations and modernization of senior buildings to support RAD conversion at three senior properties including Armour Square Apartments, Albany Terrace Apartments and the Thomas F. Flannery Apartments.
- Commencement of elevator modernization program throughout portfolio.
- Storefront replacement, upgrades and expansion to existing domestic hot water system and upgrades to select finishes at Charles Hayes Family Investment Center ("FIC").

***Additional Planned Redevelopment Activity in FY2017***

Casa Nayarit (IL# to be assigned upon closing)

In FY2017, CHA plans to participate in the real estate transaction for Casa Nayarit, a mixed-use development in the New City community area. This development, will contain approximately 60 new CHA housing units, including 20 for CHA families and 40 affordable units.

Harold Ickes Homes (IL002016000)

In FY2015, CHA selected a development team to redevelop the former Ickes site as a mixed-income, mixed-use development, including public housing and other residential, commercial, institutional, and recreational components. The total redevelopment will contain a minimum of 200 units for CHA families. CHA plans to close the first phase of development in FY2017.

Lakefront Properties Phase II For Sale Development

In FY2017, CHA plans to convey land for the Lakefront Phase II for sale development as part of the Lakefront Properties redevelopment activities. The new Phase II homeownership units will be dispersed among the twelve new Phase II rental three- and six-flat structures located on the Lakefront Properties Phase II site. (This was previously included as proposed disposition activity in CHA's FY2016 MTW Annual Plan.)

Legends South For Sale Development

In FY2017, CHA plans to convey land for the Legends South for sale development as part of the Robert Taylor Homes revitalization activities. The new homeownership units will be dispersed across the Robert Taylor revitalization site.

New City (IL# to be assigned upon closing)

In FY2017, CHA plans to participate in a real estate transaction for New City, a mixed-use development, as part of Cabrini-Green replacement housing. The New City development plans to create approximately 58 new rental apartments, including approximately 25 CHA public housing units and 33 market rate units.

Oakwood Shores Phase 2B2 (IL# to be assigned upon closing)

In FY2017, CHA plans to participate in a real estate transaction for a new rental phase as the residential component of the Quad Communities Arts & Recreation Center development. This phase will create approximately 57 new mixed-income housing units, including approximately 19 CHA public housing units. This phase of development is part of the CHA revitalization effort at the former Ida B. Wells Homes, Darrow Homes, Wells Extension and Madden Park Homes sites.

Park Boulevard Phase 3

In FY2017, CHA plans to convey land for the next phase of Park Boulevard as part of CHA Stateway Gardens revitalization activities. The proposed development activities will include new housing and commercial space. The new rental and homeownership units will be dispersed within the Park Boulevard development located on the former Stateway Gardens public housing site.

Parkside of Old Town Phase III (IL# to be assigned upon closing)

In FY2017, CHA plans to participate in a real estate transaction for Phase III at Parkside of Old Town, which plans to contain a total of 181, including 53 public housing rental units and 6 affordable and 122 market rate homeownership units. Phase III is the final phase of Parkside of Old Town, which is part of Cabrini North Extension replacement housing.

Roosevelt Square/Former ABLA Homes

CHA completed master planning activities in FY2015 for remaining undeveloped land at the former ABLA Homes site. CHA worked with a planning consultant, the City of Chicago, the working group, development partners, and community stakeholders to develop the FY2015 Roosevelt Square Framework Plan. The updated development framework introduces a new community facility in the eastern portion of the site. CHA plans to dispose of land for this new center in FY2017.

Additionally, CHA is collaborating with the National Public Housing Museum (NPHM) to create a new museum at 1322-24 West Taylor Avenue. NPHM is planning to begin construction in FY2017 on the museum.

Washington Park 45<sup>th</sup> & Cottage Grove (IL002039000)

In FY2017, CHA plans to close the real estate transaction for Washington Park replacement housing at 45<sup>th</sup> & Cottage Grove. This initial phase of development will create approximately 78 new rental apartments including 21 CHA, 35 affordable and 22 market rate units.

Funding for Redevelopment Activities

In response to Choice Neighborhoods or other Federal Notices of Funding Availability (NOFAs) released in FY2017, CHA may submit applications(s) for grant funding for redevelopment and/or planning activities.

Fannie Emanuel Senior Apartments (IL002065000)

In December 2015, CHA closed a Rental Assistance Demonstration (RAD) program transaction for the redevelopment of Fannie Emanuel Senior Apartments. In FY2017, rehabilitation work for 181 one bedroom, senior RAD units will be completed, including 37 fully accessible and 144 adaptable units.

Crowder Place, Mulvey Place, Devon Place (formerly Presbyterian Homes - IL# to be assigned upon closing)

In March 2016, CHA acquired 111 units in three buildings on the north side of Chicago. There are 41 units at 3801 N. Pine Grove (Crowder Place), 37 units at 416 W. Barry (Mulvey Place), and 33 units at 1950 W. Devon (Devon Place). CHA plans to make six units accessible and convert the properties to RAD in FY2017.

6418 N. Sheridan (IL# to be assigned upon closing)

In FY2016, CHA selected a development team to deliver approximately 60 units of CHA housing in a mixed-use development at 6418 N. Sheridan. The property will be developed on a portion of the Caroline Hedger Apartments site that comprises the parking lot and a community room. The development, as currently proposed, would include first-floor retail, including a Target department store, and up to 120 total units of housing. CHA and its development partner plan to close the RAD transaction in FY2017.

***General Description of Planned Capital Expenditures in FY2017***

**General Description of Planned Capital Fund Expenditures During FY2017**

CHA's anticipates a total of \$272.4M in planned capital expenditures for FY2017.

- \$57.4M in planned construction activities, upgrades and repairs at CHA family buildings including Altgeld Gardens, Trumbull Park, Dearborn, Brooks, Horner Homes, and Wentworth Gardens.
- \$26.2M in planned construction activities, upgrades and repairs at CHA senior buildings. This includes required life safety and fire sprinklers and other rehabilitation work at Albany Terrace Apartments, Irene McCoy Gaines Apartments, Flannery Apartments, elevator modernization and Senior Amenities Program Phase II at various senior buildings.
- \$7.5M in planned construction activities, upgrades and repairs at CHA scattered sites properties.
- \$33.7M in architectural and engineering fees and other planned construction activities, upgrades and repairs at CHA community buildings.
- \$71.3M in construction or planning/pre-development activities for mixed-income/mixed-finance properties, including Fannie Emanuel/Parkview, Villages of Westhaven, Presbyterian Homes, St. Edmund's Oasis, Harold Ickes- Phase 1A and Phase 1B, Park Boulevard Phase IIIA, Lathrop Homes Phase 1A and Phase 1B, 45th Cottage Grove, Parkside III Condo, Oakwood Shores IIB (TWO), Roosevelt Square – Phase IIA, Real Estate Acquisition Program and other master planning activities.
- \$76.3M in planned construction activities, upgrades and repairs for senior buildings that will transitions to the Rental Assistance Demonstration (RAD) program.

## Section II-B: Leasing Information

### *Planned Number of MTW Households Served at the End of FY2017*

By the end of FY2017, CHA currently anticipates serving a total of 70,540 MTW households across HCV and public housing programs. MTW HCV households include 8,765 households in sites that will be converted to RAD by the end of FY2017.

**Planned Number of Households Served at the End of FY2017**

<b>MTW Households to be Served Through:</b>	<b>Planned Number of Households to be Served*</b>	<b>Planned Number of Unit Months Occupied/Leased***</b>
Federal MTW Public Housing Units to be Leased	15,925	191,100
Federal MTW Voucher (HCV) Units to be Utilized	54,615	655,380
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Property-Based Assistance Programs **	0	0
Number of Units to be Occupied/Leased through Local, Non-Traditional, MTW Funded, Tenant-Based Assistance Programs **	0	0
<b>Total Households Projected to be Served</b>	<b>70,540</b>	<b>846,480</b>

\* Calculated by dividing the planned number of unit months occupied/leased by 12.  
 \*\* In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the PHA should estimate the number of households to be served.  
 \*\*\*Unit Months Occupied/Leased is the total number of months the PHA has leased/occupied units, according to unit category during the fiscal year.

### *Planned Number of Non-MTW HCV Households Served at the End of FY2017*

By the end of FY2017, CHA anticipates serving a total of 2,527 households through non-MTW HCV programs, including Veterans Affairs Supportive Housing (VASH), Moderate Rehab and Mainstream 5-Year programs.

<b>Non-MTW Households to be Served Through:</b>	<b>Planned Number of Households Served</b>	<b>Planned Number of Unit Months Occupied/ Leased</b>
VASH	1,200	14,400
Mod Rehab	1,277	15,324
Mainstream 5-Year	50	600
<b>Total Non-MTW Households</b>	<b>2,527</b>	<b>30,324</b>

### *Reporting Compliance with MTW Statutory Objectives*

CHA is currently in compliance. This section does not apply.

### *Description of Anticipated Issues Related to Leasing in FY2017*

<b>Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers or Local, Non-Traditional Units and Solutions in FY2017</b>	
<b>Housing Program</b>	<b>Description of Leasing Issues and Solutions</b>

Federal MTW Public Housing Program	<p>As described in previous sections, CHA will continue to prioritize the issue of offline units in FY2017 and make additional units available for occupancy as expeditiously as possible.</p> <p>CHA continuously works to match the needs of applicants on the wait list with available public housing units.</p> <p>Another barrier to public housing leasing continues to be identifying applicants who can meet all of CHA's screening criteria and successfully pass eligibility requirements.</p>
Federal MTW Housing Choice Voucher Program	In FY2017, CHA will continue to increase housing opportunities to HCV participants by facilitating lease-up in opportunity areas through increased use of its exception payment standard and landlord incentive payments.

## Section II-C: Wait List Information

In FY2017, CHA will maintain the following major wait lists across public housing and Housing Choice Voucher programs.

### ***Public Housing Wait Lists***

#### Family Housing (Community-Wide) Wait List

The Family Housing (Community-Wide) Wait List contains adult applicants who are interested in units within CHA's city-wide traditional family portfolio. This wait list was last opened in late FY2014 and will remain partially opened (for demonstration programs) in FY2017.

#### Scattered Site (Community Area) Wait Lists

The Scattered Site (Community Area) Wait Lists contain applicants interested in housing opportunities in CHA's scattered site portfolio. CHA has a wait list for each of the 77 community areas in the City of Chicago. In general, these wait lists are opened periodically (for approximately 15-30 days) in order to maintain an adequate list of applicants. CHA will continue to open Scattered Site (Community Area) Wait Lists based on need in FY2017.

#### Senior Site-Based Wait Lists

The Senior-Site Based Wait Lists are for applicants requesting studio and one-bedroom apartments in senior designated housing developments. CHA will continue to lease according to the current, approved Senior Designated Housing Plan. In FY2017, all Senior Site-Based Wait Lists will be open and accept applications.

#### Lake Parc Place (Income-Restricted) Site-Based Wait List

The Lake Parc Place (Income-Restricted) Site-Based Wait List contains applicants interested in units at CHA's Lake Parc Place property who are in the 51-80% Area Median Income (AMI) range. Lake Parc Place's Tenant Selection Plan specifies the property must achieve a balance of households with AMIs of 0-50% and 51-80%. In FY2017, the Lake Parc Place site-based wait list will be open for households at 51-80% AMI.

#### Altgeld-Murray Site-Based Wait List

In FY2017, pending HUD approval, Altgeld-Murray Homes will be the first non-income restricted traditional family property to open a site-based waitlist. Historically, Altgeld-Murray has maintained a low applicant lease rate, and a site-based waitlist is expected to improve overall occupancy. Pending approval of the FY2016 MTW Annual Plan Amendment, the site-based waitlist is scheduled to open by the 4<sup>th</sup> quarter of FY2016 and will remain open in FY2017.

**HCV Wait List**

In FY2017, CHA plans to continue the screening of applicants on the HCV Wait List and, where eligible, offer an opportunity to be housed by becoming a participant in CHA's HCV Program. CHA's HCV Wait List was last opened in late FY2014, and will remain partially opened in FY2017.

**Wait List Projections for FY2017**

Wait List Information Projected for the Beginning of FY2017				
Housing Program(s)	Wait List Type	Number of Households on Wait List	Wait List Open, Partially Open or Closed	Are There Plans to Open the Wait List During FY2017
Federal MTW Public Housing Units	Community-Wide (Family Housing)	37,077	Partially Open	N/A
Federal MTW Public Housing Units	Program Specific (Scattered Site/Community Area)	8,405	Partially Open	N/A
Federal MTW Public Housing Units	Site-Based (Senior)	14,177	Open	N/A
Federal MTW Public Housing Units	Site-Based (Lake Parc Place)	2,204	Partially Open	N/A
Federal MTW Public Housing Units	Site- Based (Altgeld Murray Homes)	N/A	N/A	Yes
Federal MTW Project Based Voucher Program	Program Specific (PRA Program)	15,637	Partially Open	N/A
Federal MTW Project Based Voucher Program	Site-Based (Senior PRA)	300	Closed	No
Federal MTW Housing Choice Voucher Program	Program Specific (Tenant-Based Vouchers Only)	40,000	Partially Open	N/A

**Description of Partially Opened Wait Lists**

<b>Community-Wide (Family Housing)</b> In FY2017, the Community Wide wait List will remain open for the families that meet the eligibility criteria for and are participating in a CHA demonstration program or special initiatives.
<b>Community-Area (Scattered Sites Wait Lists)</b> Community Area wait lists are open to residents of specific Chicago Community Areas who can meet residency requirements. In FY2017, CHA will open these wait lists as needed for specific community areas.
<b>Lake Parc Place Site Based Wait List</b> Public housing units at Lake Parc Place are offered through a site-based wait list, in accordance with the Tenant Selection Plan, to achieve a balance of households with Area Median Incomes of 0-50% and 51-80%. In FY2017, CHA anticipates the site-based waiting list will be open for families within the 51-80% AMI category.

### **HCV and PRA/PBV Wait Lists**

In FY2017, the CHA HCV Wait List will remain open for the following families:

- a) A family that meets the eligibility criteria for and is participating in a CHA demonstration program or special initiative
- b) A family that is a victim of a federally declared natural disaster affecting the city of Chicago
- c) A family that is an active participant in a Witness Protection Program or State Victim Assistance Program
- d) A family living in a CHA public housing unit which must be rehabilitated to meet ADA/504 requirements and for whom an alternate CHA public housing units is not available
- e) An over-housed or under-housed family living in a Section 8 Moderate Rehabilitation project administered by CHA for which no appropriate size unit is available in the same project that is already under a HAP contract
- f) A family that qualifies for a targeted funding voucher (eg. VASH, NED, FUP, etc.)

### ***Description of Local, Non-Traditional Program***

This is not applicable.

### ***Description of Other Wait List Type***

This is not applicable.

### ***Changes to CHA Wait Lists in FY2017***

#### **HCV/PH Demonstration Program Wait List Policy**

In FY2017, CHA will continue to implement a wait list policy change for demonstration programs in Public Housing and HCV. For demonstration programs and special initiatives, applicants that meet the individual program criteria will be pulled from the existing CHA wait list. If there are no applicants eligible for a specific program/initiative on the wait list, then applicants may be generated by referral from various community organizations or other government agencies. Referred applicants who meet program requirements are added to the wait list and are provided a local preference in accordance with the demonstration program for which they qualify. The demonstration wait list will remain open for qualified applicants.

#### **PRA/PBV**

In FY2017, CHA will also continue to expand the number of individual senior site-based wait lists for the PRA (PBV) program as properties come online.

#### **Public Housing Site-Based Wait Lists Proposal**

CHA proposes to begin a process of transitioning traditional family developments to site-based waitlists in FY2017.

CHA's Tenant Selection and Assignment Plan (TSAP) is the agency's policy that determines how applicants are placed on waitlists and in what priority applicants are screened and offered housing opportunities within CHA's family public housing, income-restricted housing, and senior housing. All waitlists offer ranking preferences (e.g. domestic violence, veterans, etc.) and require that applicants notify CHA of changes to their preference status. Additionally, it is the applicant's responsibility to contact CHA to update their contact information or household composition. Failing to meet screening criteria, refusing a unit offer without good cause, or failing to respond to outreach will result in an applicant being removed from all waitlists.

#### ***Background***

Currently, site-based waitlists provide housing opportunities for applicants eligible for Income-Restricted and Senior Housing while the Community-Wide Waitlist provides housing opportunities for applicants eligible for CHA's Traditional Family Public Housing. Individuals interested in housing opportunities within CHA's Family Properties must register and be randomly selected and placed on the Community-Wide Waitlist.

The Community-Wide Waitlist opened in 2014 and is now closed. Applicants had the opportunity to select a geographic area in which they would prefer to reside (North, South, Central, Mid-South, or West) or select to be housed in the first available unit across all CHA Family Properties. Only applicants that express a preference for housing opportunities within a specified geographic region or first available waitlist list applicants are eligible to be contacted for outreach and screening opportunities for properties within specific regions.

#### ***Leasing Challenges***

Generally, CHA Family Properties maintain a low applicant lease rate. Properties conduct applicant outreach and screening at an average ratio of 10 applicants for every one vacant unit. Though applicants have the opportunity to be placed on the Community-Wide Waitlist by geographic region and are required to update their contact information, many are commonly

removed from the waitlist for declining property specific unit offers and failing to respond to outreach attempts. Transitioning to site-based waitlists will ensure higher leasing ratios, as applicants self-selecting their property choice will yield improved leasing results.

*Implementation Plan*

Site-Based Waitlists will allow applicants to complete and submit electronic housing applications from CHA's website. The waitlists will be subdivided by bedroom type, accessible/mobility units, and sensory units and will also allow for ranking preferences in the following order of priority:

- i. Emergency applicants who are victims of federally declared disasters;
- ii. Domestic violence victims;
- iii. Veterans, active or inactive military personnel and immediate family members of both; and
- iv. Family preservation

During FY2017, all existing Community-Wide Waitlist applicants will receive notification of CHA's intent to transition from the Community-Wide Waitlist, which allows applicants to be placed on a 'Geographic Regional Waitlist' or 'First Available Waitlist', to 'Site-Based Waitlists' through the standard waitlist update process. CHA will communicate with applicants by first class mail, electronic mail, and automated robo calls. Applicants will be notified that they have 30 calendar days from the date of the first notice to respond to the update and select a site-based waitlist or risk being removed from the waitlist—'Geographic Region or First Available Waitlist'. Applicants who do not respond within 30 calendar days will be mailed a second notice and will have 15 calendar days from the date of the second notice to make their site-based waitlist selection. At the end of the 15 calendar days, a final status letter will be sent to applicants confirming their site-based waitlist selection or informing them of their removal from the waitlist due to their non-responsiveness.

Site-Based Waitlists will provide applicants the opportunity to choose where they desire to be housed and additionally improve CHA leasing ratios. Sufficient data will be available (e.g., total applicants on site-based waitlist lists, estimated wait time for housing, etc.) to give applicants the ability to make informed decisions regarding their housing selection.

Currently, CHA does not intend to maintain a First-Available Waitlist along with its proposed Site-Based Waitlists. We will, however, continue to evaluate waitlist activity and will open a First-Available Waitlist if deemed necessary.

CHA will continue to implement a wait list policy change in FY2017 for demonstration programs in Public Housing and HCV. For demonstration programs and special initiatives, applicants that meet the individual program criteria will be pulled from site-based waitlist as applicable. If there are no applicants eligible for a specific program/initiative on the wait list, then applicants may be generated by referral from various community organizations or other government agencies. Referred applicants who meet program requirements are added to the wait list and are provided a local preference in accordance with the demonstration program for which they qualify. The demonstration wait list will remain open for qualified applicants.



# Section Three

## **PROPOSED MTW ACTIVITIES**

### **Section III: Proposed MTW Activities: HUD Approval Requested**

This section includes newly proposed MTW activities for which CHA is requesting HUD approval for FY2017.

#### **MTW Activities Related to Public Housing and HCV**

##### ***Modified Family Self Sufficiency Program for HCV and Public Housing Participants (2014-01)***

- **Description and Impact:** Beginning in FY2017, CHA proposes additional changes to the Family Self Sufficiency (FSS) Program. CHA is requesting authorization for an exemption from the requirement that FSS enrollments must take place within 120 days of an annual or interim recertification of income process. The HUD policy from *Interim Notice PIH 93-24, Family Self Sufficiency Program Issues May 27, 1993* is not a regulatory policy, and with MTW authority can be modified. CHA public housing and Housing Choice Voucher households engage in a biennial income recertification schedule, unless changes in income are reported. As a result, any household wanting to enroll in FSS outside of the 120-day annual /interim window must request an interim recertification of income, even if the household income is unchanged, or they must wait up to 20 months until the next annual recertification.

Approximately 264 families on the current FSS waitlist (as of June 2016) were referred to or directly contacted the program to enroll, that were then placed on the FSS waitlist because they needed to complete and interim recertification of income before enrolling. When a household requests an interim recertification of income, it can take between 30 – 90 days for the recertification to become effective, delaying the participant's ability to enroll in FSS.

An exemption from the requirement that FSS enrollments take place within 120 days of an annual or interim recertification of income process will impact future FSS participants by providing a shorter wait time from orientation to the enrollment appointment. With the exemption, instead of a wait time of 30 – 90 days for the recertification, the household can enroll in FSS after attending an orientation session. The overall goal is to maximize engagement in the FSS program and assist households in becoming economically self-sufficient through easing barriers to enrollment.

Previously, in FY2014, CHA received approval to revise the participation requirements for the Family Self-Sufficiency program for public housing and HCV participants in the following ways:

- Provide FSS participants with the ability to opt out of the Earned-Income Disregard so that they begin earning escrow more quickly.
- Terminate participants from the FSS program who are not engaged with the program to open slots for those who are more interested in taking advantage of it. (This will not affect their housing subsidy.) Engagement will be defined as having at least one face-to-face meeting with an FSS coordinator each year.
- Create more stringent education requirements for program participants, including attending three financial literacy sessions each year.
- Require participants to be continuously employed for at least 12 months prior to program completion.

These revisions will remedy several issues, including existing disincentives to participation due to a short period of time in which to earn escrow, underutilization of the program by participants who are not fully interested in engaging, and lack of financial self-sufficiency of current graduates. The overall goal is to maximize engagement in the FSS program and maximize the benefits of participation for those enrolled in the program.

The impact of this activity is that more participants will remain engaged, obtain escrow, and increase consistent employment so they are better prepared for economic self-sufficiency upon graduation.

- **Implementation Year:** FY2014, updates proposed for FY2017
- **Statutory Objective:** MTW Statutory Objective II: Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
- **Status Update:** CHA has not yet implemented the ability to terminate participants from FSS who are not engaged with the program. CHA will implement once the FSS program is at capacity to create availability for program slots. Participants enrolling in FSS on or after 6/1/2015 are held to the requirement of attending three financial literacy sessions each year. This is written into the Individual Training and Services Plan (ITSP). Pending HUD approval of the proposed exemption of the 120-day recertification requirement, CHA will begin to implement this component in FY2017.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark
SS-1: Increase in Household Income	Average earned income of households affected by this policy in dollars (increase).	In FY2013, the average income from wages among FSS participants was \$8,855 (742 participants).	In FY2017, the average income from wages among FSS participants will remain stable at \$8,800.
SS-2: Increase in Household Savings	Average amount of savings/escrow of households affected by this policy in dollars (increase).	In FY2013, FSS participants had an average escrow of \$2,819 (742 participants).	In FY2017, the average escrow per FSS participant will remain stable at \$2,800
SS-3: Increase in Positive Outcomes in Employment Status*	Other category defined as:  Having earned income.	In FY2013, 344 FSS participants had income from wages.	In FY2017, 400 FSS participants will have income from wages.
		In FY2013, 46% of FSS participants had income from wages.	In FY2017, the percent of FSS participants with income from wages will remain stable at 46%.
SS-4: Households Removed from TANF	Number of households receiving TANF assistance (decrease).	In FY2013, 133 FSS participants were receiving TANF.	In FY2017, the number of FSS participants receiving TANF will remain stable at 208.
SS-5: Households Assisted by Services that Increase Self-Sufficiency	Number of households receiving services aimed to increase self-sufficiency (increase).	Approximately 1,000 FSS participants as of 12/31/12.	In FY2017, 900 total FSS participants (including 250 new FSS participants) will be enrolled.
SS-6: Reducing Per Unit Subsidy Costs for Participating Households	Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	<b>Public Housing:</b> In FY2013, the average subsidy per public housing household was \$6,519 (based on 21,417 eligible units).	<b>Public Housing:</b> The average subsidy per public housing household is projected to be approximately \$7,614 (based on 18,523 eligible units) in FY2017.

## Section III: Proposed MTW Activities: HUD Approval Requested

		<u>HCV:</u> In FY2013, the average subsidy per HCV household was \$8,922 (based on 36,679 eligible vouchers).	<u>HCV:</u> The average subsidy per HCV household is projected to be \$9,816 (based on 48,840 HAP vouchers) in FY2017.
SS-7: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<u>Public Housing:</u> In FY2013, public housing FSS participants contributed a total of \$1,006,056 (237 households).  <u>HCV:</u> In FY2013, HCV FSS participants contributed a total of \$1,831,476 (505 households).	<u>Public Housing:</u> The total contribution of public housing FSS participants will remain stable at \$1,000,000 (230 households) in FY2017.  <u>HCV:</u> The total contribution of HCV FSS participants will remain stable at \$1,800,000 (500 household
SS-8: Households Transitioned to Self-Sufficiency	Number of households transitioned to self-sufficiency (increase).	In FY2012, 109 participants graduated from the FSS program.	In FY2017, 40 participants will graduate from the FSS program.
<p>*For SS-3 tracking, CHA defines "employed" based on whether income from wages is recorded in Yardi, CHA's system of record.</p> <p>**For SS-8 tracking, CHA is establishing graduation from the FSS program as a definition of self-sufficiency.</p>			

- Data Collection: CHA will track the following for FSS program participants: average income from wages and employment status (defined as having income from wages), average escrow accumulation, program enrollment, resident contribution toward rent and yearly graduation totals as a measure of self-sufficiency.
- Authorization: Attachment C, Section E of CHA's Amended and Restated MTW Agreement, which waives certain provisions of Section 23 of the 1937 Housing Act and 24 CFR 984.

#### MTW Activities Related to HCV

##### ***Elimination of Assets in Income Calculation after Initial Eligibility for HCV Program (2017- 01)***

- Description and Impact: CHA proposes to reinstate this activity, which was previously closed out in FY2014. CHA acknowledges that it drastically improves program efficiency and limits the burden on program participants by decreasing the amount of documentation needed. Upon implementation, the calculation of assets will only be done at intake and is no longer necessary at re-examination. CHA wants to reduce administrative burden on staff by decreasing the amount of time spent on these calculations and achieve greater cost savings. Currently, asset calculations have minimal impact on overall rent calculation and tenant portion. The impact of this activity is a reduction in staff resources and costs associated with verifying assets after initial admission.

As of June 2016, approximately 29% of HCV households reported assets. Of these 10,380 households, only 1.4% (641) received income from assets that exceeded the threshold amount to impact their tenant portion. Of those, 73.6% (472) received less than \$100 annually from these assets. Since income from assets is small, eliminating asset calculations after initial eligibility will have a minimal impact on rent calculation for these households. CHA estimates that calculating assets takes roughly 20 minutes (.34 hours) during an examination

for a cost of approximately \$15 per examination. In FY2015, CHA calculated assets 12,119 times and spent approximately 4,120 hours (.34 x 12,119) and \$181,785 (\$15 x 12,119). Overall, the elimination of assets after initial eligibility has minimal impact on households. In addition, CHA will reduce administrative costs by eliminating the asset calculation after the initial eligibility and participants will get the benefit of having income from assets omitted in future rent calculations.

- **Implementation Year:** proposed FY2017
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures
- **Hardship Policy:** If a participant loses income from assets in between an initial examination and a re-examination, the participant may request an interim re-examination to adjust their rent calculation.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark
CE-1 Agency Cost Savings	Total cost of task (in dollars)	In FY2015, asset calculations for all examination types for HCV cost \$181,785 (\$15 x 12,119)	Once this policy is implemented in FY2017, CHA will track cost savings for this activity.
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease)	In FY2015, CHA spent 4,120 staff hours on asset calculations for all examination types for HCV (.34 hours x 12,119 asset calculations)	Once this policy is implemented in FY2017, CHA will track staff time savings for this activity.

- **Data Collection:** CHA will track staff time and cost savings for elimination of assets in income calculations after eligibility.
- **Authorization:** Attachment C, Section D (1)(c) and Attachment C, Section D, (3)(b) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of 24 C.F.R. 982.516 and 24 C.F.R. 982.518.

#### ***Incentive Payments for Landlords in CHA Opportunity Areas (2017- 02)***

- **Description and Impact:** CHA is proposing to provide a one-time incentive payment in the amount of the contract rent to landlords in any instance where an HCV participant is entering into a new lease for a unit located in an Opportunity Area. The tight rental market in Chicago, especially in CHA Opportunity Areas, coupled with the additional processing time to lease-up an HCV tenant compared to a market rate tenant, may provide a disincentive for Opportunity Area landlords to participate in the HCV program. CHA believes this payment could incentivize more landlords in CHA Opportunity Areas to participate in the HCV program.

On average, it takes 51 days from the time an RTA is submitted until execution of the final HAP contract. Many landlords in tighter rental markets (such as Opportunity Areas) forego participating in the HCV Program because of this additional processing time, which results in a prolonged vacancy and amounts to at least one month of lost rent for the unit. This incentive would partially off-set any losses the landlord may incur as a result of holding the unit for a tenant with an HCV voucher. This payment would be made simultaneously as the initial HAP payment.

A potential impact of this activity is increased costs to CHA for such payments. On average, per unit rental price in an Opportunity Area is approximately \$1,300 per month. As the CHA had 584 participants move into units in

Opportunity Areas in 2015, if the activity had been implemented during that year, it would have cost the CHA roughly \$760,000. If this incentive is successful, the associated costs would increase. However, CHA initially proposes placing a cap at 750 of such payments to be made during FY2017. The maximum total amount of these payments, therefore, assuming the average \$1,300 monthly rental amount, would be approximately \$975,000. CHA will continue to monitor this activity and adjust the cap in coming years if necessary. In conjunction with this activity, the CHA also commits to study ways to streamline its lease-up process to decrease the need for these types of payments in the future. If CHA is able to reduce the time from when an RTA is submitted to when a HAP contract is executed, HCV participants will be at less of a disadvantage in the rental market.

CHA proposes that these incentive payments are funded using HCV HAP funds, rather than HCV administrative funds.

- Implementation Year: proposed FY2017
- Statutory Objective: MTW Statutory Objective I: Increase housing choices for low-income families.
- Standard Metrics:

Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark
HC-5: Increase in Resident Mobility	Number of households able to move to a neighborhood of opportunity as a result of the activity	In FY2015, CHA had a total of 586 households move into Opportunity Areas.	In FY2017, CHA anticipates that in 650 households will move into Opportunity Areas and whose landlords will receive an incentive payment.

- Data Collection: CHA will track number of participants who move into an Opportunity Area whose landlords receive an incentive payment simultaneous with their first HAP payment.
- Authorization: Amendment No. 6 to CHA's Amended and Restated MTW Agreement.

#### ***Time Limit Demonstration Program for Housing Choice Voucher Participants (2017- 03)***

- Description and Impact: CHA proposes to implement an eight-year time limit demonstration program for a total of 100 families. After eight years, participants who have not reached a zero HAP may be eligible for a two-year extension for a total of ten years. Elderly and disabled are excluded from this demonstration program. In reviewing existing population data, CHA has determined that there is sufficient evidence that the waitlist population is a representative sample to test this demonstration program. A review of the current Housing Choice Voucher (HCV) population found that most HCV households remain on the subsidy for an average of ten years. Furthermore, a review of FY2013 CHA Family Self Sufficiency Program (FSS) graduates has found that 67% of graduates have higher incomes than non-FSS households, with an average income increase of \$16,495 post enrollment in the FSS program.

Through the demonstration program, CHA proposes that 50 families are to be selected from the Housing Choice Voucher waitlist, with an AMI between 0% - 50% for participation (Group 1). As a condition of receiving the voucher, these 50 families will be required to participate in the CHA FSS program, and will be required to receive case management services from the FSS service provider. All HCV FSS rules and regulations apply, including the requirement of participants to be continuously employed for at least 12 months, all household members must be free of welfare assistance prior to program completion, mandatory attendance at financial literacy sessions, and engagement with the FSS service provider in a face-to-face meeting at least once per year. Noncompliance

with the FSS program will be reviewed by the Housing Choice Voucher department and the participant's FSS coordinator, and may result in a capped HAP payment. The participant will not be required to give up the subsidy.

The remaining 50 families will also be selected from the Housing Choice Voucher waitlist, with an AMI between 51% - 80% for participation (Group 2). As a condition of receiving the voucher, these 50 families will be required to participate in case management services from CHA FamilyWorks providers. Services will be aimed at increasing self-sufficiency so that families can successfully transition off the subsidy. These services include, but are not limited to, workforce development training and placement, education, financial literacy, and mental health case management resources. Group 2 will be subject to CHA's work requirement. CHA will utilize the same work requirement policies in effect for public housing, including Safe Harbor. CHA's work requirement applies to adult members age 18 to age 54, or age 17 and not attending school full time. Applicable adult members are required to be engaged in employment or employment related activities for, at least, 20 hours per week, unless the resident is eligible for an exemption or granted Safe Harbor. Noncompliance with the work requirement will be reviewed by the Housing Choice Voucher department and the participant's FamilyWorks provider, and may result in a capped HAP payment. The participant will not be required to give up the subsidy.

The 100 families (Group 1 and 2) will be allowed to access a voucher through a priority preference as demonstration program participants, thereby accessing a voucher quicker than if the wait list applicants were not selected for the demonstration program. While the final details will be determined in coordination with the HCV Participant Council, this will be achieved by sending out a letter notifying wait list participants about the demonstration program and an invitation to apply should they fit into the requirement of either group 1 or 2. The letters will be sent to the lower 50% of the wait list to create an additional incentive for participation, but may be sent in application order pending agreement with the Participant Council. Letters that are sent will detail the demonstration program and wait list holders will be invited to submit interest via telephone or email. There will be no adverse impact to wait list holders who are non-responsive. Interest in the demonstration program will be taken in response order for each of the two groups (prospective participants would be required to supply income information) and placed on a Demonstration Wait list, with sub lists for Groups 1 and 2. It is anticipated that CHA will over recruit. Wait list holders who ultimately are not selected for enrollment will return to the HCV wait list in their previous order. CHA will require that all Participants in the program meet all of the regular HCV admissions requirements. Those not meeting the HCV Admission criteria will be removed from the demonstration and HCV wait lists. To the extent possible, each group will receive orientation and briefings with their respective group all at once and go through the demonstration as two cohorts. Demonstration participants would be subject to portability restrictions and will be required to remain in Chicago. Participants may however, dual enroll in CHA's Mobility Counseling Program should they choose to move to an Opportunity Area. Participants will also be allowed to enroll in CHA's Choose to Own program and purchase a home within the ten-year time period. Doing so would be treated as a positive exit from the program. Participants in Group 2 would be allowed to enroll in CHA's FSS program, although unlikely.

In order to evaluate the impacts of this demonstration program, CHA will issue a Request for Proposals to conduct research to determine the outcomes of the ten-year time limit.

Overall, the time limit demonstration program will increase housing choice through time limits, allowing the CHA to offer housing assistance to additional families on the wait list and reduce wait list times. The goal of the demonstration program is to increase family self-sufficiency through an assessment of family needs,

development of service plans, assistance with self-sufficiency activities and an incentivized escrow savings plan that will allow families to fully transition off the housing subsidy after eight or ten years.

- **Implementation Year:** FY2018
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families. MTW Statutory Objective II: Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
- **Hardship Policy:** A participant may request that their case be reviewed by a Hardship Panel if they have extenuating circumstances supporting a continuation of housing assistance beyond the eight-year period for an additional two years, for a total of ten years. The three-person Hardship Panel is comprised of (1) A Representative from the Housing Choice Voucher Participant Council (2) A Representative from the Housing Choice Voucher Program (3) A non-CHA Representative, either the assigned FamilyWorks Provider or FSS Provider. Requests to have cases reviewed by the Hardship Panel must be made at least six months prior to the end of participation in the demonstration program during the eight year. All recommendations made by the Hardship Panel will be forwarded to the Housing Choice Voucher Administrator for review. Extenuating circumstances that may be considered include:
  - Health and/or medical issues
  - Employment/Unemployment/or under-employment issues
  - Past performance of participant and adherence to Demonstration program requirements
  - Previous participation in CHA sponsored or referred services and/or programs
  - Other extenuating circumstances.

After the ten-year period, demonstration program participants who have not successfully reached a zero HAP payment to transition off the subsidy will have their HAP payment capped. The CHA will not increase the HAP at any time after the ten years, however the participant will not be required to give up the subsidy. This policy will allow participants to continue on the path towards self-sufficiency by freezing HAP payments until the participant reaches a zero HAP. Post program participants, who receive a capped HAP, may also request a hardship due to loss of employment for a 6 month period, approved by the panel.

- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark
SS-1: Increase in Household Income*	Average earned income of households affected by this policy in dollars (increase).	50 households in Group 1 will not have income at baseline.	In FY2017, 0 households in Group 1 will have an income increase.
		50 households in Group 2 will have earned income at baseline.	In FY2017, 0 households in Group 2 will have an income increase.
SS-3: Increase in Positive Outcomes in Employment Status*	Other category: Having earned income	0% of households in Group 1 will have earned income	In FY2017, 0% of households in Group 1 will have earned income
		100% of households in Group 2 will have earned income.	In FY2017, 0% of households in Group 2 will have earned income.

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SS-4 Households Removed from Temporary Assistance for Needy Families (TANF)	Number of households receiving TANF assistance (decrease)	At program start, XX HCV participants who are work able received TANF	The number of residents who transition off of TANF will remain consistent with the general CHA population
SS-5: Households Assisted by Services that Increase Self Sufficiency	Number of households receiving services aimed to increase self-sufficiency (increase).	0% of households will not have received services prior to program implementation.	In FY2017, 0% of households will receive services.
SS-6: Reducing Per Unit Subsidy Costs for Participating Households	Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	The average subsidy per HCV household was \$9,756 per HCV household (based on 45,977 HAP vouchers) in FY2016.	The average subsidy per HCV household is projected to be \$9,816 (based on 48,840 HAP vouchers) in FY2017.
SS-7: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	At program entry rental revenue will be comparable to general HCV population	The average subsidy for participants in the program will be projected to be greater than the general HCV population
SS-8: Households Transitioned to Self-Sufficiency**	Number of households transitioned to self-sufficiency (increase).	0% of participants will be transitioned to self sufficiency	In FY2017, 0% of participants will be transitioned to self-sufficiency.
HC-1: Increasing housing choice	Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0 participants at baseline	In FY2017, 0 participants will obtain new housing.
HC-3: Decrease in Wait List Time	Average applicant time on wait list in months (decrease).	In FY2017, the average applicant wait list time is between 96 months (8 years).	In FY2017, 0% of applicants will decrease their wait list time.

- Data Collection: CHA will track the self-sufficiency activities for Housing Choice Voucher Participants and the average wait list time prior to implementation of the activity.
- Authorization: Attachment C, Section D(1)(b), Section D(2)(a) and (d).

#### MTW Activities Related to Local Programs

##### ***Funding for City of Chicago Housing Assistance Programs (2017-04)***

- Description and Impact: When CHA last opened its wait list in 2014, more than 250,000 households applied to take part in a lottery of which only 90,000 were selected for placement on the wait lists. There is assumed to be more than 650,000 households that were potentially eligible for assistance in the city of Chicago. While CHA has put forth some MTW initiatives and demonstration programs, we are interested in a more streamlined approach to offer assistance through partnerships with two City partners who more directly work with vulnerable populations in need of housing assistance including short and longer term subsidy.

CHA proposes to implement program based assistance, using its single fund flexibility, to help families access and remain stably housed. This program will include two parts: 1) shorter term homeless prevention assistance or short term assistance through rapid rehousing through the Department of Family & Support Services; and 2)

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longer term rental assistance by creating up to 60 additional units of subsidy through the low income trust fund program of the Chicago Department of Community Development. In all cases, social services will be linked to the housing assistance to ensure that families achieve stability. Examples of target populations would include families who experience homelessness or who are at risk of becoming homeless, transitional aged youth, survivors of domestic violence, homeless veterans and other vulnerable populations that are a priority of Chicago.

Funds would be used for bridge rental assistance, rent arrearages with a current landlord, move-in fees and deposits, and creation of up to 60 additional units of affordable housing through the Chicago Low Income Housing Trust Fund. CHA anticipates allocating no more than \$800,000 for bridge assistance, arrearage and deposits and unit subsidies for 60 units.

CHA proposes that participation should be as low barrier as possible in order to serve vulnerable households. Participants must: 1) include at least one person who is a U.S. citizen, national, or non-citizen with eligible immigration status; 2) must have be subject to a lifetime ban for assistance due to registration as a sex offender or has been convicted of production/manufacture of methamphetamine on premises of federally assisted housing; or 3) owe money to the Chicago Housing Authority. All participants' annual gross income cannot exceed 80% of area median income.

- **Implementation Year:** FY2017 or FY2018
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families using Single Fund Budget with Full Flexibility.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark
CE-4: Increase in Resources Leveraged	Amount of funds leveraged in dollars (increase)	Funds leveraged as part of City's homelessness plan equals zero	CHA will add an additional \$X to services and units available to address homelessness.
SS-5: Households Assisted by Services that Increase Self Sufficiency	Number of households receiving services aimed to increase self-sufficiency (increase).	Zero program participants received services prior to implementation of the program.	50 participants will receive services through CHA funding assistance for city programs in FY2017.
SS-8: Households Transitioned to Self Sufficiency	Number of households transitioned to self-sufficiency (Increase)	Zero program participants transitioned to self sufficiency	50 participants will receive security deposits or homelessness prevention services in the first year of implementation
HC-1: Increasing housing choice	Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Zero units were available made available through CHA funding assistance for city programs.	30 units of housing will be made available through CHA funding assistance for city programs in FY2017.
HC-7: Households Assisted by Services that Increase Housing Choice	Number of households receiving services aimed to increase housing choice (increase)	Zero households assisted in the Program Based Assistance program.	60 participants will receive social services that increased housing choice,

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- Data Collection: CHA will track the metrics for the program through its partner agencies, including through Chicago's Homeless Management Information System (HMIS)
- Authorization: Amendment No. 6 to CHA's Amended and Restated MTW Agreement; Attachment C.



# Section Four

## **APPROVED MTW ACTIVITIES**

## **Section IV: Approved MTW Activities: HUD Approval Previously Granted**

This section contains information on CHA's approved MTW activities. None of the below metrics have changed from FY2016.

### **Implemented Activities**

#### **MTW Activities Related to Housing/Development**

##### ***Revitalization of 25,000 Units (2000-01)***

- **Description and Impact:** CHA is committed to the goal of replacing 25,000 housing units as part of the original Plan for Transformation and MTW Agreement obligations. Each year CHA continues to make progress toward the goal by completing additional housing units and creating more housing options for CHA's residents. The impact of this activity is that more affordable housing opportunities are available to low-income residents in Chicago neighborhoods through rehabilitation, redevelopment, acquisition and the use of project-based vouchers.
- **Implementation Year:** FY2000
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Status Update:** CHA continues to pursue a variety of unit delivery strategies to achieve the 25,000 unit goal. In FY2017, CHA plans to deliver an additional 1596 public housing and project-based voucher units.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark
HC-1: Additional Units of Housing Made Available	Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Zero units were delivered toward the 25,000 unit goal prior to FY2000.	CHA will deliver 1179 new housing units in FY2017 toward the 25,000 unit goal.
HC-2: Units of Housing Preserved	Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	Zero units were rehabilitated toward the 25,000 unit goal prior to FY2000.	CHA will preserve 417 PBV units, including 275 through Mod Rehab conversions, in FY2017 toward the 25,000 unit goal.

- **Data Collection:** CHA tracks the number of public housing units delivered and newly available for occupancy toward the 25,000 unit goal, including units completed through new construction, rehabilitation, and acquisition as well as project-based units under HAP contracts in Chicago.
- **Authorization:** Attachment D, Paragraph 1 and Amendment 3 of CHA's Amended and Restated MTW Agreement in which the 25,000 unit goal addresses the requirement of Section 204(c) (3) (c) of the 1996 Appropriations Act.

##### ***Alternate Reasonable Cost Formula for Redevelopment and Rehabilitation (2010-01)***

- **Description and Impact:** In FY2010, HUD approved an alternative reasonable cost formula for CHA redevelopment activities to replace HUD's current Total Development Cost (TDC) limits. Rising construction costs, reduced low-income housing tax credit equity prices, and reduced soft loan funds had combined to significantly reduce the number of new public housing units that CHA was able to deliver at mixed-income development sites. The increased reasonable cost limits cover the full cost of public housing units, as originally

intended, and increase public housing opportunities on an annual basis. The current impact of the increased reasonable cost limits is that CHA is able to finance the full cost of public housing units in mixed-income developments which allows the tax equity and soft loan funds to be directed toward the construction of the accompanying affordable housing units at these mixed-income developments.

Through a FY2014 MTW Annual Plan Amendment, CHA received approval to utilize this alternative reasonable cost formula for both redevelopment and rehabilitation projects. Based on parameters for rehabilitation in the Capital Fund regulations, CHA has determined it no longer needs separate alternative reasonable cost limitations for rehabilitation and redevelopment. CHA will instead utilize one alternative reasonable cost formula for all projects moving forward, and, in accordance with Capital Fund regulations, rehabilitation project cost levels will be no more than 90% of the alternate cost formula.

- **Implementation Year:** FY2010 (expansion of this activity approved in FY2014)
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Status Update:** In FY2015, CHA utilized the alternative cost formula to close and start construction at Sterling Park, City Gardens, St. Edmund's Oasis, and Clybourn 1200 which will deliver a total of 116 public housing units in FY2016 – FY2017. In FY2017 CHA plans to utilize the alternative cost formula to close and start construction at seven sites which will deliver a total of 186 public housing units in FY2018.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark
HC-1: Additional Units of Housing Made Available	Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0 additional public housing units made available through use of the alternate TDC formula.	20 additional public housing units delivered through the use of the alternate TDC formula.
HC-2: Units of Housing Preserved	Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	Zero housing preserved through use of the alternate TDC formula.	Zero housing units are expected to be preserved in FY2017 through use of the alternate TDC formula.
HC-3: Decrease in Wait List Time	Average applicant time on wait list in months (decrease).	As of FY2013, 11,313 applicants on the Public Housing Family Wait List have an average wait time of 41 months.	As of June 2016, 47,686 applicants on the Public Housing Family Wait List have an average wait time of 45.2 months.
HC-4: Displacement Prevention	Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	Zero households lost assistance or had to move prior to use of the alternate TDC formula.	Zero households will lose assistance or have to move in FY2016 through use of the alternate TDC formula.

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CE-1: Agency Cost Savings	Total cost of task (in dollars).	CHA spent zero dollars through use of the alternate TDC formula prior to implementation.	<p>In FY2017, CHA will use the MTW alternative TDC formula to deliver 25 additional public housing units at a cost of \$7,501,362 and place 42 additional public housing units under construction at a cost of \$14,151,675.</p> <p>In FY2017, CHA estimates a cost of \$0.00 for rehabilitation projects using the alternate TDC formula.</p>
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Units Planned for FY2017 Delivery that will use MTW TDC	Public housing units without MTW TDC	Additional public housing units with MTW TDC	Total Public Housing Units
Sterling Park	53	13	66
St. Edmund's Oasis	17	2	19
Clybourn 1200	21	5	26
<b>Total Units</b>	<b>91</b>	<b>20</b>	<b>111</b>

Developments Planned to be Under Construction in FY2017 using MTW TDC	Public housing units without MTW TDC	Additional public housing units with MTW TDC	Total Public Housing Units
New City	20	0	20
Oakwood Shores 2B2	11	6	17
Parkside III	42	11	53
Casa Nayarit	16	4	20
Park Blvd. IIIA Rental	17	8	25

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RSIIA Market	22	8	30
45 <sup>th</sup> and Cottage Grove	16	5	21
<b>Total Units</b>	<b>144</b>	<b>42</b>	<b>186</b>

- **Data Collection:** CHA tracks the additional number of public housing units that can be constructed and delivered toward the 25,000 goal using the alternative cost formula. CHA also tracks the average time on the Public Housing Family Wait List and the cost of the activity. CHA tracks the number of units rehabilitated/preserved through the use of this alternative cost formula.
- **Authorization:** Attachment C, Section C (16) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of Section 6(b) of the 1937 Act and 24 C.F.R. 941.306. This allows CHA to establish an alternative reasonable cost formula reflecting CHA's actual costs experienced for construction activity in the local market as the cost control measure for quality construction work.

#### ***Expedited Public Housing Unit Acquisition Process (2015-01)***

- **Description and Impact:** CHA is authorized to use MTW flexibility to support CHA's Real Estate Acquisition Program and to expedite the acquisition of units and/or buildings as public housing units in CHA- designated Opportunity Areas as well as Gautreaux-designated General and Revitalizing Areas. Through this activity, CHA would acquire units and/or buildings without prior HUD approval, provided that CHA certifies that HUD site selection requirements have been met. CHA would also be able to provide a commitment to certain developers before they acquire properties that they intend to sell to CHA after rehabilitation or construction. The units acquired may be condominiums, single-family homes (less than four units), or multifamily buildings containing non-public housing units. Condominium properties with less than 10 dwelling units are excluded from this activity unless CHA acquires all of the dwelling units in the association.

While CHA would ensure that all applicable HUD and other federal requirements are met prior to acquisition, including environmental reviews, CHA would submit appropriate documentation to the local HUD Field Office for subsequent approval. Permitted costs for acquisition and rehabilitation would be within CHA's approved mixed-income total development cost limits using the alternate cost formula previously approved by HUD. Environmental review would be completed by CHA's designated Responsible Entity.

This initiative will increase the effectiveness of CHA's efforts to expand the number of available public housing units, including in mixed-income settings, by allowing CHA to take advantage of time-sensitive market opportunities for unit and/or building purchases and by expediting the acquisition process.

- **Implementation Year:** proposed FY2015
- **Statutory Objectives:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark

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HC-1: Additional Units of Housing Made Available	Number of new housing units made available for households at or below 80% AMI as a result of CHA's expedited acquisition process.	0 additional public housing units were made available as a result of CHA's expedited acquisition process. prior to FY2015.	5 additional public housing units will be made available as a result of this activity in FY2017.
HC-3: Decrease in Wait List Time	Average applicant time on wait list in months as a result of CHA expedited acquisition process.	As of FY2013, 11,313 applicants on the Public Housing Family Wait List have an average wait time of 41 months.	As of June 2016, 47,686 applicants on the Public Housing Family Wait List have an average wait time of 45.2 months.
HC-5: Increase in Resident Mobility	Number of households able to move to a better unit and/or neighborhood of opportunity as a result of CHA expedited acquisition process.	0 households were able to move to a better unit and/or neighborhood of opportunity prior to FY2015 as a result of CHA expedited acquisition process.	5 households will be able to move to a better unit and/or neighborhood as a result of this activity.

- **Data Collection:** CHA will track the number of additional public housing units made available through the acquisition process. As this activity is implemented, CHA may revise the activity's metrics.
- **Authorization:** Attachment C, Section C(13) of CHA's Amended and Restated MTW Agreement allows acquisition of public housing sites without HUD approval, provided that the agency certifies that HUD site selection requirements have been met. Attachment C, Section B2 of CHA's Amended and Restated MTW Agreement provides that MTW Agencies may make available to Agency Partners (including related entities) the least restrictive regulatory requirements allowable for the implementation of MTW initiatives.

### MTW Activities Related to Public Housing and HCV

#### ***\$75 Minimum Rent for Public Housing and HCV (2009-01)***

- **Description and Impact:** Through the approval of the FY2007 ACOP for public housing and the approval of the FY2008 HCV Administrative Plan, CHA instituted an increase in the minimum rent from \$50 to \$75 for public housing and HCV programs. The \$75 minimum rent was approved in FY2008 and first implemented in FY2009 across both programs as resident re-examinations took place. The impact of the revised minimum rent level is an increase in rent revenue from residents paying the minimum rent.
- **Implementation Year:** FY2009 (public housing and HCV)
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:** CHA continues to allow public housing and HCV households to pay a minimum rent of \$75, or less if they request a hardship to minimum rent.
  - **HCV:** As of June 2016, the minimum rent population (those paying \$75 per month) includes 8,069 HCV households. In addition, there are 386 HCV households (5%) in the hardship population, meaning they are paying less than \$75 per month.
  - **Public Housing:** As of June 2016, the minimum rent population includes 1,912 Public Housing households. 215 (11.2%) Public Housing households from the total minimum rent population, have a hardship and are paying less than \$75.
- **Standard Metrics:**

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Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark
CE-5: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<p><u>HCV:</u> In FY2008, 5,010 residents were expected to pay \$50 minimum rent for a total annual contribution of \$3,006,000.</p> <p><u>Public housing:</u> In FY2008, 1,524 residents were expected to pay \$50 minimum rent for a total annual contribution of \$914,400.</p>	<p><u>HCV:</u> In FY2017, 8300 residents will be paying \$75 minimum rent for a total annual contribution of \$7,470,000.</p> <p><u>Public housing:</u> As of June 2016, 1,697 households were expected to pay \$75 minimum rent for a total annual contribution of \$1,527,300.</p>

- Data Collection: CHA tracks Total Tenant Payment (TTP) data to determine the number of residents who contribute \$75 towards rent and those granted hardships.
- Authorization: For public housing, Attachment C, Section C(11) of CHA's Amended and Restated MTW agreement, which waives certain provisions of Section 3(a)(2), 3(a)(3)(A) and Section 6(l) of the 1937 Act and 24 C.F.R.5.603, 5.611, 5.628, 5.630, 5.632, 5.634 and 960.255 and 966 Subpart A. For HCV, Attachment C, Section D(2)(a) of CHA's Amended and Restated MTW agreement which waives certain provisions of Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H-I) of the 1937 Act and 24 CFR 982.508, 982.503 and 982.518. These waivers allow CHA to determine the minimum rent amount.

### ***Choose to Own Homeownership Program for Public Housing and HCV (2011-01)***

- Description and Impact: In FY2014, CHA received approval to institute a higher minimum income requirement for eligibility for the Choose to Own Homeownership Program. Rather than the current minimum income of \$14,500, the new eligibility requirement will be 50% or more of the Area Median Income (AMI). The overall goal is to help ensure that those who participate in the Choose to Own program successfully transition to self-sufficiency once their subsidy period is over. Specifically, this activity addresses the issue that some program participants will not be able to assume their full mortgage when their 15-year subsidy period ends, putting them at risk of foreclosure. The new minimum income requirement took effect for all new HCV and public housing program enrollees when the FY2015 HCV Administrative Plan reflecting these changes, approved by CHA's Board in August 2014, went on January 1, 2015. It does not apply to those prior to that date in the program preparing to purchase a home. This change also does not apply to those who are elderly or disabled who enroll in the program.

In FY2011, CHA expanded the Choose to Own (CTO) Home Ownership Program beyond HCV participants to current CHA public housing residents. Public housing residents who meet program criteria are now also eligible to participate in the CTO program in addition to current HCV participants. Participants of this program receive a subsidy to be used toward the payment of their monthly mortgage obligation. Pre- and post-home ownership education and counseling requirements are an integral component to remain an eligible participant.

The overall impact of the Choose to Own program is to increase self-sufficiency and expand housing options through opportunities for home ownership.

- **Implementation Year:** FY2011 (expansion to public housing), FY2015 (new income eligibility requirement)
- **Statutory Objectives:**
  - MTW Statutory Objective I: Increase housing choices for low-income families.
  - MTW Statutory Objective II: Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
- **Status Update:** The new minimum income requirement affecting all HCV and public housing program enrollees went into effect on January 1, 2015. This new requirement has not had a negative impact in enrollment in the program. In FY2016, CHA is on track to close the 500<sup>th</sup> home utilizing the Choose to Own program.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark
SS-5: Households Assisted by Services that Increase Self-Sufficiency	Number of households receiving services aimed to increase self-sufficiency (increase).	0 families enrolled under new income requirements.	In FY2017, 30 families will enroll under new income requirements.
SS-8: Households Transitioned to Self-Sufficiency*	Number of households transitioned to self-sufficiency (increase).	26 families (23 HCV and 3 public housing) purchased a home in FY2012.	In FY2017, 30 families (25 HCV and 5 public housing) will purchase homes.
HC-6: Increase in Homeownership Opportunities	Number of households that purchased a home as a result of the activity (increase).	26 families (23 HCV and 3 public housing) purchased a home in FY2012.	In FY2017, 30 families (25 HCV and 5 public housing) will purchase homes.
*For the SS-8 standard metric tracking, CHA is establishing the purchase of a home through Choose to Own as a definition of self-sufficiency.			

- **Data Collection:** CHA tracks program enrollment and the number of homes purchased by both public housing residents and HCV Program participants.
- **Authorization:** Attachment C, Section B, Paragraph 1(b)(iii), and Attachment C, Section D, Paragraph 8 (a-b) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of Sections 8 (o)(15) and 8(y) of the 1937 Act and 24 C.F.R 982.625 through 982.643.

#### ***Triennial Re-examinations for Households with Only Elderly/Disabled Participants and Fixed Income for HCV and Public Housing (2014-02)***

- **Description and Impact:** CHA proposes to implement a streamlined triennial re-examination schedule for public housing and HCV fixed income households consisting of only elderly and/or disabled participants. Given the infrequency of income changes for these households, the impact of this activity is decreased staff time and resources currently utilized for conducting re-examinations for this population. In addition, this activity will decrease the re-examination burden for fixed income elderly/disabled households.
- **Implementation Year:** FY2015 (HCV and Public Housing)

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- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:**
  - **HCV:** In FY2015, CHA began processing already scheduled HCV biennial re-examinations and assigning the new date of re-examination based on a triennial schedule (FY2018). In FY2016, CHA continued processing already scheduled HCV biennial re-examinations and will assign a new date based on a triennial schedule (FY2019).
  - **Public Housing** CHA will implement triennial re-examinations for public housing in August 2016. All eligible residents will be placed on the triennial re-examination schedule by the end of August 2017.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline^	FY2017 Benchmark
CE-1: Agency Cost Savings	Total cost of task (in dollars).	<p><b>HCV:</b> In FY2013, based on the existing biennial schedule, CHA spent \$269,325 on re-exams for eligible fixed-income elderly/ disabled households (3,591 x \$75).</p> <p><b>Public Housing:</b> In FY2013, CHA spent \$367,800 on annual re-exams for fixed-income elderly/disabled households (4,904 re-exams x \$75).</p>	<p><b>HCV:</b> In FY2017, based on the existing biennial schedule, CHA will spend approximately \$768,500 on re-exams for fixed-income elderly/disabled households (5,300 x \$145).</p> <p><b>Public Housing:</b> In FY2016, CHA will spend approximately \$725,000 on annual re-exams for fixed income elderly/disabled households (5,000 re-exams x \$145).</p>
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	<p><b>HCV:</b> In FY2013, based on the existing biennial schedule, CHA spent 12,569 staff hours on re-exams for eligible fixed-income elderly/ disabled households (3,591 re-exams x 3.5 hours).</p> <p><b>Public Housing:</b> In FY2013, CHA spent 17,164 staff hours on annual re-exams for public housing fixed-income disabled/elderly households (4,904 re-exams x 3.5 hours).</p>	<p><b>HCV:</b> In FY2017, based on the existing biennial schedule, CHA will spend approximately 34,450 staff hours on annual re-exams for HCV fixed income disabled/elderly (5,400 re-exams X 6.5 hours).</p> <p><b>Public Housing:</b> In FY2017, CHA will spend approximately 32,500 staff hours on annual re-exams for public housing fixed-income (5,000 re-exams x 6.5 hours).</p>
CE-5: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<p><b>HCV:</b> In FY2013, based on the existing biennial schedule, eligible fixed-income</p>	<p><b>HCV:</b> In FY2017, based on the existing biennial schedule, eligible fixed-income elderly/disabled</p>

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		elderly/disabled households contributed a total of \$11,398,176 (3,591 households).	households will contribute a total of approximately \$18,000,000 (5,300 households).
		<u>Public Housing:</u> In FY2013, public housing fixed-income elderly/disabled households contributed a total of \$15,526,368 (4,904 households).	<u>Public Housing:</u> As of June 2016, public housing fixed-income elderly/disabled households contributed a total of \$17,583,152 (4,775 households).
^CHA has adjusted baselines for these metrics based on implementation plans for biennial and triennial re-examinations.			

- Data Collection: CHA will track the staff time and cost savings for triennial re-examinations. In FY2014, CHA conducted a new time study and cost analysis for re-examinations. The cost per re-examination increased from \$75 to \$145. The time to conduct a re-examination increased from 3.5 hours to 6.5 hours. The new analyses included itemized costs (direct and indirect) of a random sample population and track costs associated with re-examinations. Itemized costs reviewed included but were not limited to operating expenses, staffing, training, and quality control activities
- Authorization: For public housing, Attachment C, Section C (4) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of sections 3(a)(1) and 3(a)(2) of the 1937 Act and 24 C.F.R 966.4 and 960.257. For HCV, Attachment C, Section D (1)(c) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of Section 8 (o)(5) of the 1937 Act and 24 CFR 982.516.

### ***CHA Re-Entry Pilot Program (2014-04)***

- Description and Impact: In FY2014, CHA proposed a Re-entry Pilot Program for up to 50 eligible participants who are:
  - 1) Reuniting with a qualifying family member currently living in CHA traditional public housing (excluding mixed-income sites) or participating in CHA's HCV Program, or
  - 2) On a CHA wait list and meeting eligibility requirements for the program when they are called for screening (in the existing wait list order).

CHA will partner with designated/approved re-entry program provider partners who will identify potential program participants to apply for the program. Eligibility requirements for the program include:

- Participants must have completed a minimum of one year in a re-entry program with one of the Reentry Pilot service providers.
- Participants must be reuniting with spouse, parent, grandparent, sibling or adult child currently in CHA's Public Housing or HCV Program or must be on a CHA wait list.
- Participants with the following convictions are not eligible: murder, attempted murder, terrorism, and any of HUD's mandatory criminal background exclusions including sex offenses and criminal drug activity resulting in eviction (see CHA's HCV Administrative Plan and Public Housing Admissions and Continued Occupancy Policies/ACOP for detailed information).
- Participants must be drug free.

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Participants will be required to consent to the requirements of the Re-entry Pilot which will allow CHA to consult with the designated re-entry provider. Heads of Households will also be required to consent to participation and reunification with the participant family member. Participants must meet CHA's work requirement (including those who reunite with an HCV household) and engage in mandatory supportive services by one of the designated/approved re-entry provider partners. Services will include ongoing case management intervention for life skill development, mental health, and employment and training. Participants will sign a conditional lease/agreement for a period of two years with the option to extend for another two years, pending compliance with program requirements. After successful completion of a four-year term, the family may request that the pilot participant be added to their household, with certain ongoing program requirements detailed in the lease/agreement.

- **Implementation Year:** FY2015
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Status Update:** CHA received necessary approvals from HUD in FY2015. CHA began program implementation in FY2015, and enrollment will depend on partner agency referrals. In FY2016, CHA reduced the time commitment of social services from one year to six months of mandatory service engagement with the reentry social service provider prior to applying the reentry program in an effort to attract more participants. CHA has also implemented a marketing campaign for the program to raise awareness for individuals and families. The program utilization has been slower than anticipated, as such in FY2017 CHA expects 10 participants.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	2017 Benchmark
CE-4: Increase in Resources Leveraged	Amount of funds leveraged in dollars (increase).	Zero funds were leveraged through the re-entry pilot program prior to implementation.	\$35,000 funds leveraged through the re-entry pilot program for services for 10 initial participants in FY2017.
SS-1: Increase in Household Income	Average earned income of households affected by this policy in dollars (increase).	In FY2013, the average income from wages for 54,901 PH and HCV households was \$4,285.	The average income from wages for households with program participants will remain consistent with CHA's average in FY2017.
SS-3: Increase in Positive Outcomes in Employment Status*	Other category defined as:  Having earned income.	In FY2013, 11,104 of 24,139 "work-able" PH and HCV heads of household had income from wages.  In FY2013, 46% of "work-able" PH and HCV heads of household had income from wages.	The percent of "work-able" heads of household with income from wages, with program participants, will remain consistent with CHA's overall work-able population in FY2017.
SS-5: Households Assisted by Services that Increase Self-Sufficiency	Number of households receiving services aimed to increase self sufficiency (increase).	Zero program participants received services through the re-entry pilot program prior to implementation.	10 program participants will receive services through the re-entry pilot program in FY2017.

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SS-6: Reducing Per Unit Subsidy Costs for Participating Households	Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	<p><u>Public Housing:</u> In FY2013, the average subsidy per public housing household was \$6,519 (based on 21,417 eligible units).</p> <p><u>HCV:</u> In FY2013, the average subsidy per HCV household was \$8,922 (based on 36,679 eligible vouchers).</p>	<p><u>Public Housing:</u> The average subsidy per public housing household is projected to be approximately \$7,614 (based on 18,523 eligible units) in FY2017.</p> <p><u>HCV:</u> The average subsidy per HCV household is projected to be \$9,756 (based on 45,977 HAP vouchers) in FY2017.</p>
SS-7: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<p><u>PH:</u> In FY2013, PH households contributed a total of \$65,718,276 (17,942 households) at an average of \$3,663 per household per year.</p> <p><u>HCV:</u> In FY2013, HCV households contributed a total of \$123,023,928 (36,959 households) at an average of \$3,329 per household per year.</p>	<p><u>PH:</u> The total contribution of public housing families with program participants will be consistent with CHA's average in FY2017.</p> <p><u>HCV:</u> The total contribution of HCV families with program participants will be consistent with CHA's average in FY2017.</p>
SS-8: Households Transitioned to Self-Sufficiency**	Number of households transitioned to self-sufficiency (increase).	Zero program participants transitioned from a conditional lease to join the household after four years prior to implementation.	Zero program participants will transition from a conditional lease to join the household in FY2017.
HC-5: Increase in Resident Mobility	Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	Zero program participants moved to CHA housing through the re-entry pilot program prior to implementation.	10 program participants will move to CHA housing through the re-entry pilot program in FY2017.

- Data Collection: CHA, in partnership with re-entry providers, will track the number of program participants, participant compliance with requirements and service participation.
- Authorization: Attachment C, Section B(4) of CHA's Amended and Restated MTW Agreement which allows the development of conditional housing programs and waives certain provisions of Sections 3, 4, 5, 8 and 9 of the 1937 Act and 24 CFR 941, and 960 Subpart B. CHA is seeking MTW authority specifically to implement

conditional program participation agreements and mandatory participation in services as a component of the program.

***Mobility Counseling Demonstration Program Work Requirement (2016-01)***

- **Description and Impact:** In FY2015, CHA designed a Mobility Counseling Demonstration Program for applicants on the public housing waitlist as of December 16, 2014 who have at least one school-aged child under the age of 13. Applicants who consent to participation in the program would move to either a CHA Opportunity or Gautreaux-designated General Area utilizing a tenant-based Housing Choice Voucher. Participants would also agree to participate in mobility counseling services, which include education and information on tenant rights and responsibilities, community tours, and housing search counseling. Further, participants who move with the voucher will receive \$500 towards their move in fee or security deposit. These services are consistent with CHA's existing mobility counseling program. In addition, participants will receive 2 years of follow up services through CHA's FamilyWorks program, including social service supports necessary for obtaining and retaining employment and/or enrollment in education or training programs.  
CHA determines eligibility by filtering the existing public housing waitlist and sending outreach letters to potential candidates who have more than one person listed in the household composition. If a candidate does not respond to the outreach letter, they remain on the public housing waitlist. If a candidate does respond to the letter, household eligibility is determined in order to ensure that the household has a least one school-aged child under the age of 13 along with other requirements. If the household is deemed eligible by CHA, they are then referred to participate in a HCV screening and briefing/orientation prior to voucher issuance. Only participants who lease a unit are removed from the public housing wait list. At no other time is a household removed from the public housing waitlist. If at any time during the outreach, eligibility and selection process a candidate is deemed ineligible, the household maintains their position on the waitlist.

All Housing Choice Voucher program rules apply. However, since the Mobility Counseling Demonstration Program targets CHA Opportunity Areas, exception payment standards are allowable. Furthermore, participants receive 150-day search time from the time the voucher is issued, rather than requiring participants to request extensions. If a participant is not able to find a unit within the allotted time, they are returned to the public housing waitlist.

Since the target population for the Mobility Counseling Demonstration Program comes from the public housing waitlist, where applicants assume that they will participate in CHA's work requirement activity, CHA is proposing to carry the work requirement over to this population in order to test how a work requirement might work in the HCV program. CHA will utilize the same work requirement policies in effect for public housing, including Safe Harbor. Specifically, Public Housing Work Requirement (2009-02) requires that applicable adult members of public housing households be engaged in employment or employment-related activities for at least 20 hours per week, unless the resident is eligible for an exemption or granted Safe Harbor. Further, in the FY2011 ACOP, CHA changed the age range of the work requirement to apply to adult members of public housing households age 18 to age 54, or age 17 and not attending school full-time.

CHA intends to begin implementation of the Mobility Counseling Demonstration Program in FY2015, prior to HUD approval of the work requirement component. Upon HUD approval, all new participants who consent to the program will be subject to CHA's existing work requirement, Public Housing Work Requirement (2009-02). Details of the full work requirement activity can be found on page 33 under this activity.

- **Implementation Year:** Proposed FY2016

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- Statutory Objective: MTW Statutory Objective II: Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
- Hardship Policy: Participants unable to meet CHA's work requirement, who are not exempt, can apply for Safe Harbor which provides relief in 90 day increments while engaging in activities to become compliant.
- Standard Metrics:

Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark
SS-1: Increase in Household Income*	Average earned income of households affected by this policy in dollars (increase).	In FY2014, the average income from wages for public housing households with a "work-able" adult subject to the work requirement was \$12,085 (5,051 households).	In FY2017, the average income from wages for households with program participants will be consistent with CHA's average for public housing households subject to the work requirement.
SS-3: Increase in Positive Outcomes in Employment Status*	Other category: Having earned income	In FY2014, 2,464 (59%) of 4,154 "work-able" public housing heads of household subject to the work requirement had income from wages.	In FY2017, the percent of program participant heads of household with income from wages will be consistent with CHA's average for public housing households subject to the work requirement
		In FY2014, 59% of "work-able" public housing heads of household subject to the work requirement had income from wages.	
SS-4: Households Removed from TANF	Number of households receiving TANF assistance (decrease).	Zero program participants were removed from TANF prior to implementation of the demonstration program	In FY2017, 5 households will be removed from TANF
SS-5: Households Assisted by Services that Increase Self Sufficiency	Number of households receiving services aimed to increase self-sufficiency (increase).	Zero program participants received services prior to implementation of the demonstration program.	In FY2017, 125 households participating in the program will receive services
SS-6: Reducing Per Unit Subsidy Costs for Participating Households	Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	In FY2014, the average subsidy per HCV household was \$9,570 based on 39,319 vouchers.	In FY2017, the average subsidy per HCV household with program participants will be consistent with CHA's average subsidy per HCV household
SS-7: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	Zero dollar increase in agency rental revenue prior to implementation of the demonstration program.	In FY2017, the total contribution of participation households will be consistent with CHA's average
SS-8: Households Transitioned to Self-Sufficiency**	Number of households transitioned to self-sufficiency (increase).	In FY2014, 47% of public housing households subject to the work requirement (2,357 of	In FY2017, the number of program participant households subject to the work requirement with all

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		5,051) had all adults in compliance.	adults in compliance will be consistent with CHA's average for public housing households subject to the work requirement.
HC-5: Increase in Resident Mobility	Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	Zero program participants received services prior to implementation of the demonstration program.	In FY2017, 125 households will be housed
<p>*For SS-1 and SS-3 tracking, CHA defines "work-able residents" as those age 18 to 54 who are not receiving SSI, SSDI or a pension. CHA defines "employed" based on whether income from wages is recorded in Yardi, CHA's system of record.</p> <p>**For SS-8, CHA is establishing households in which all adults are compliant with the work requirement as a definition of self-sufficiency.</p>			

- **Data Collection:** CHA tracks work requirement compliance at the time of re-examination. CHA tracks the changes in compliance status each year compared to the previous year. In addition, CHA tracks income and employment outcomes for work-able public housing heads of household as well as contribution toward rent, average subsidy, engagement in services and average time for applicants on the wait list.
- **Authorization:** Attachment C, Section D(3)(b) of CHA's Amended and Restated MTW Agreement which gives CHA authority to implement resident eligibility policies in the HCV program that differ from standard program requirements and regulations. Attachment C, Section D(2)(a) of CHA's Amended and Restated MTW Agreement which gives CHA authorization for the security deposit. Attachment D, Section 21 of CHA's Amended and Restated MTW Agreement which gives CHA authorization for the work requirement.

### ***Biennial Re-examinations for HCV and Public Housing (2014-03)***

- **Description and Impact:** CHA plans to implement biennial re-examinations for public housing residents to review family circumstances, income, assets, expenses, and family composition to establish continued eligibility for public housing. The impact of this activity is a decrease in staff time and resources for conducting re-examinations for applicable families. In addition, this activity decreases the re-examination burden for participants who undergo re-examinations on a biennial basis instead of an annual basis. Biennial re-examinations will be applicable for those public housing residents who are not on annual or triennial re-examination schedules. <sup>2</sup>  
CHA currently conducts biennial re-examinations for HCV Program participants to review family circumstances, income, assets, expenses, and family composition to establish continued eligibility for the HCV Program. The impact of this activity is a decrease in staff time and resources for conducting re-examinations for applicable families. In addition, this activity decreases the re-examination burden for participants who undergo re-examinations on a biennial basis instead of an annual basis. Biennial re-examinations will be applicable for those HCV households who are not on annual or triennial re-examination schedules. <sup>3</sup>
- **Implementation Year:** FY2017 for Public Housing, FY2006 for HCV

<sup>2</sup> CHA conducts annual re-examinations for public housing and HCV households participating in the FSS and Choose to Own programs and households in Moderate Rehab properties. CHA is planning to implement triennial re-examinations for fixed-income households with only elderly and/or disabled participants.

<sup>3</sup> CHA conducts annual re-examinations for public housing and HCV households participating in the FSS and Choose to Own programs and households in Moderate Rehab properties. CHA is planning to implement triennial re-examinations for fixed-income households with only elderly and/or disabled participants.

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- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:** Biennial reexaminations for public housing residents will begin in August 2016. All residents will be on a biennial re-examination schedule by then end of August 2017.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline^	FY2017 Benchmark
CE-1: Agency Cost Savings	Total cost of task (in dollars).	<p><b>HCV:</b> In FY2013, HCV households who had re-exams, based on a biennial schedule, (14,105 households, or half of the total 28,209 biennial-eligible households) cost approximately \$1,057,875. (14,105 re-exams x \$75).</p> <p><b>Public Housing:</b> In FY2013, annual re-exams for PH households eligible for biennial re-exams cost \$960,075 (12,801 re-exams x \$75).</p>	<p><b>HCV:</b> In FY2017 annual re-exams for applicable HCV participants will cost approximately 2,305,500 (15,900 re-exams X \$145)</p> <p><b>Public Housing:</b> As of June 2016, annual re-exams for PH households eligible for biennial re-exams cost \$1,661,410, (11,458 re-exams x \$145).</p>
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	<p><b>HCV:</b> In FY2013, for HCV households who had re-exams, based on a biennial schedule (14,105 households, or half of the total 28,209 biennial-eligible households), CHA spent 49,368 staff hours (14,105 re-exams x 3.5 hours)</p> <p><b>Public Housing:</b> In FY2013, CHA spent 44,804 staff hours on annual re-exams for PH households eligible for biennial re-exams (12,801 x 3.5 hours).</p>	<p><b>HCV:</b> In FY2017, CHA will spend 103,350 staff hours on annual re-exams for applicable HCV participants (15,900 X 6.5)</p> <p><b>Public Housing:</b> As of June 2016, CHA spent 75,000 staff hours on annual re-exams for PH households eligible for biennial re-exams (11,458 x 6.5 hours).</p>
CE-5: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<p><b>HCV:</b> In FY2013, HCV households who had re-exams, based on a biennial schedule, contributed a total of \$47,568,930 (14,105 households, or half of the</p>	<p><b>HCV:</b> In FY2017, HCV households who are due for re-exams, based on a biennial schedule, will contribute a total of \$55,000,000.</p>

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		total 28,209 biennial-eligible households).  <u>Public Housing:</u> In FY2013, public housing households eligible for biennial re-exams contributed a total of \$49,185,852 (12,801 households).	<u>Public Housing:</u> As of June 2016, public housing households eligible for biennial re-exams contribute a total of \$48,000,000 (11,500 households).
SS-1: Increase in Household Income	Average earned income of households affected by this policy in dollars (increase).	<u>HCV:</u> In FY2013, the average income from wages for 28,209 HCV households who were eligible for biennial re-exams was \$5,226.  <u>Public Housing:</u> In FY2013, the average income from wages for public housing households eligible for biennial re-exams was \$5,564. (12,801 households).	<u>HCV:</u> In FY2017, the average income from wages for 16,000 HCV households who had biennial reexams is expected to be \$6,000.  <u>Public Housing:</u> As of June 2016, the average income from wages for public housing households eligible for biennial re-exams was \$5,500. (11,000 households).
SS-3: Increase in Positive Outcomes in Employment Status*	Other category: Having earned income.	<u>HCV:</u> In FY2013, 3,697 “work-able” HCV heads of household had income from wages (of 14,105 households, or half of the total 28,209 biennial-eligible households).  In FY2013, 42% of “work-able” HCV heads of household eligible for biennial re-exams had income from wages in FY2013 (3,697 of 8,776 work-able heads of household).  <u>Public Housing:</u> In FY2013, 2,976 “work-able” public housing heads of household eligible for biennial re-exams had income from wages.	<u>HCV:</u> In FY2017, 3,700 “workable” HCV heads of household are expected to have income from wages.  In FY2017, 48% of “workable” HCV heads of household eligible for biennial re-exams are expected to have income from wages.  <u>Public Housing:</u> In FY2017, 3,000 “workable” public housing heads of household eligible for biennial re-exams are expected to have income from wages

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		In FY2013, 59% of “work-able” public housing heads of household eligible for biennial re-exams had income from wages.	In FY2017, 59% of “workable” public housing heads of household eligible for biennial re-exams are expected to have income from wages.
SS-4: Households Removed from Temporary Assistance for Needy Families (TANF)	Number of households receiving TANF assistance (decrease).	<p><u>HCV:</u> In FY2013, 1,480 HCV households were receiving TANF (of 14,105 households, or half of the total 28,209 biennial-eligible households).</p> <p><u>Public Housing:</u> In FY2013, 6,319 public housing households (out of 12,801) eligible for biennial re-exams were receiving TANF.</p>	<p><u>HCV:</u> In FY2017, the number of HCV households eligible for biennial reexaminations who receive TANF will remain stable at 1,500</p> <p><u>Public Housing:</u> In FY2017, the number of public housing households eligible for biennial reexaminations who receive TANF will remain stable at 6,300.</p>
SS-8: Households Transitioned to Self-Sufficiency**	Number of households transitioned to self-sufficiency (increase).	<p><u>HCV:</u> In FY2013, 1,144 HCV households moved up at least one AMI category (of 14,105 households, or half of the total 28,209 biennial-eligible households).</p> <p><u>Public Housing:</u> In FY2013, 1,029 public housing households (out of 12,801) eligible for biennial re-exams moved up at least one AMI category.</p>	<p><u>HCV:</u> In FY2017, 1,200 HCV households (of 16,000 who had biennial reexams) moved up at least one AMI category.</p> <p><u>Public Housing:</u> In FY2017, 1,000 Public Housing households (out of 11,500) eligible for biennial re-exams are expected to move up at least one AMI category.</p>
<p>^CHA has adjusted baselines for these metrics based on implementation plans for biennial and triennial re-examinations.  *For SS-3 tracking, CHA defines “work-able households” as those age 18 to 54 who are not receiving SSI, SSDI or a pension. CHA defines “employed” based on whether income from wages is recorded in Yardi, CHA’s system of record.  **For SS-8 tracking, CHA is establishing the movement up to a higher Area Median Income (AMI) category as a definition of self-sufficiency. CHA tracks the following AMI categories: Thriving (above 80% AMI), Stable (51-80% AMI), Safe (31-50% AMI with at least one employed household member), At Risk (0-30% AMI with at least one employed household member) and Crisis (0-50% AMI with zero employed work-able adults in household).</p>			

- Data Collection: CHA will track the staff time and cost savings for biennial re-examinations. In addition, CHA will continue to track the following metrics for households eligible for biennial re-examinations: resident contribution toward rent, average income from wages and employment status (defined as “having earned income”) for “work-able” heads of household, and those who move up to a higher AMI category as described above.

In FY2014, CHA conducted a new time study and cost analysis for re-examinations. The cost per re-examination increased from \$75 to \$145. The time to conduct a re-examination increased from 3.5 hours to 6.5 hours. The new analyses included itemized costs (direct and indirect) of a random sample population and track costs associated with re-examinations. Itemized costs reviewed included but were not limited to operating expenses, staffing, training, and quality control activities.

- Authorization: For HCV, Attachment C, Section D (1) (c) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of Section 8(o) (5) of the 1937 Act and 24 C.F.R. 982.516. For public housing, Attachment C, Section C (4) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of sections 3(a)(1) and 3(a)(2) of the 1937 Act and 24 C.F.R 966.4 and 960.257.

#### MTW Activities Related to Public Housing

##### ***Public Housing Work Requirement (2009-02)***

- Description and Impact: CHA implemented a work requirement in FY2009 as a condition of occupancy across its public housing portfolio. Applicable adult members of public housing households are required to be engaged in employment or employment related activities for, at least, 20 hours per week, unless the resident is eligible for an exemption or granted Safe Harbor. With Board approval of the FY2011 ACOP, CHA changed the age range of the work requirement to apply to adult members of public housing households age 18 to age 54, or age 17 and not attending school full time.<sup>4</sup> CHA provides resources to aid residents in fulfilling the work requirement through case management services and workforce development programs. The impact of the public housing work requirement is a greater number of residents engaged in employment, education, job training, and community service in order to achieve self-sufficiency.

Currently, upon a third request for Safe Harbor and subsequent requests, CHA requires residents who seek Safe Harbor for reason of failure to obtain employment to work with their service provider to obtain a workforce assessment and to develop an action plan prior to returning to a property manager. If a resident is seeking Safe Harbor for any other reason (e.g. waiting on SSI determination); this process does not apply. Residents who are approved for Safe Harbor are re-examined every 90 days to determine their compliance. If a resident is denied Safe Harbor, the resident has the right to grieve CHA's decision through the grievance process outlined in CHA's Resident's Grievance Procedure.

CHA will implement the following updates to the public housing work requirement.

- CHA is updating this activity to reflect that existing work requirements in public housing and mixed-income properties transitioning to Project-Based Vouchers (PBV) and/or added through transfer of assistance under the RAD program, as outlined in CHA's ACOP and Tenant Selection Plans, will carry over for any individual who was previously subject to a work requirement as well as for new residents after RAD PBV conversions. The work requirement policy for RAD PBV sites is also outlined in Chapter 18 of the HCV Administrative Plan, which was released for public comment in November 2014 and approved by CHA's Board in January 2015.
- CHA is proposing to increase the time period for each Safe Harbor period from 90 days to 180 days. CHA has determined that 90 days is insufficient time for a resident to establish an action plan to meet the requirement, which often results in multiple Safe Harbor requests. Increasing the time period to 180

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<sup>4</sup> The original work requirement applied to every adult member of a public housing household, age 18 to age 61 (or age 17 and not attending school full time).

days will enable residents to work with a service provider to create and implement an action and engagement plan. CHA will revise the ACOP as necessary after approval of this change.

- CHA is requesting authorization to require participation in services for all residents who receive Safe Harbor and for those who are non-compliant with the work requirement. Mandatory services would be provided by CHA's FamilyWorks program. FamilyWorks is currently a voluntary program, however this requirement will ensure that FamilyWorks service providers intervene in a timely manner to provide assistance. Engagement in FamilyWorks as part of the work requirement will enable residents to receive needed assistance faster in order to be compliant with the work requirement. CHA would implement the following procedures to enforce this requirement:
  - The resident and service provider will develop and sign a resident-driven action plan upon the initial request for Safe Harbor, which outlines what is needed to become compliant with the work requirement.
  - At the end of the 180-day Safe Harbor period (or upon the resident obtaining employment), the FamilyWorks service provider will confirm that the resident is engaged with the work requirement, as defined in the agreed-upon individual action plan.
  - Residents who are engaged, as defined by the action plan, but who need additional time will be approved to receive Safe Harbor or additional Safe Harbors, as applicable.
  - Residents who are not engaged, as defined by the action plan, and are not meeting the work requirement will not be approved to receive additional Safe Harbors.
  - Non-compliant residents are subject to lease termination.
- Implementation Year: FY2009 (FY2016, pending HUD approval)
- Statutory Objective: MTW Statutory Objective II: Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
- Status Update: Upon HUD approval, CHA will engage 100% households to participate in services for all residents who receive Safe Harbor and for those who are non-compliant with the work requirement.
- Standard Metrics:

Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark
SS-1: Increase in Household Income*	Average earned income of households affected by this policy in dollars (increase).	In FY2013, the average income from wages for households with a "work-able" adult subject to the work requirement was \$11,365 (5,081 households).	In FY2017, the average income from wages for households with a "work-able" adult subject to the work requirement will remain stable at \$12,500 (4,500 households).
SS-3: Increase in Positive Outcomes in Employment Status*	Other category: Having earned income	2,347 "work-able" public housing heads of household subject to the work requirement had income from wages in 2008. <hr/>	In FY2017, "workable" heads of household subject to the work requirement with income from wages will remain stable at 2,500. In FY2017, "workable" heads of

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		52.7% of work-able public housing heads of household subject to the work requirement had income from wages in 2008.	household subject to the work requirement with income from wages will remain stable at 59%.
SS-4: Households Removed from TANF	Number of households receiving TANF assistance (decrease).	In FY2013, 2,390 “work-able” public housing households with a “work-able” adult subject to the work requirement received TANF.	In FY2017, “workable” households with a “work-able” adult subject to the work requirement receiving TANF will remain stable at 2,500.
SS-5: Households Assisted by Services that Increase Self Sufficiency	Number of households receiving services aimed to increase self-sufficiency (increase).	In FY2013, 4,527 public housing households with a “work-able” adult subject to the work requirement were engaged with service providers through Family Works.	In FY2017, the number of public housing households with a “work-able” adult subject to the work requirement engaged with service providers through Family Works will remain stable at 4,300.
SS-6: Reducing Per Unit Subsidy Costs for Participating Households	Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	In FY2013, the average subsidy per public housing household was \$6,519 (based on 21,417 eligible units).	The average subsidy per HCV household is projected to be \$9,816 (based on 48,840 HAP vouchers) in FY2017.
SS-7: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	In FY2013, public housing households with a “work-able” adult subject to the work requirement contributed a total of \$21,401,844 (5,081 households).	In FY2017, the total contribution of households with a “work-able” adult subject to the work requirement will remain stable at \$20,500,000 (4,500 households).
SS-8: Households Transitioned to Self-Sufficiency**	Number of households transitioned to self-sufficiency (increase).	In FY2012, 52% of households subject to the work requirement (2,246 of 4,350 households) had all adults in compliance.	The percent and number of households subject to the work requirement that will have all adults in compliance will remain stable at 50% (2,400 households) in FY2017.

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HC-3: Decrease in Wait List Time	Average applicant time on wait list in months (decrease).	As of FY2013, 11,313 applicants on the Public Housing Family Wait List have an average wait time of 41 months.	As of June 2016, 47,686 applicants on the Public Housing Family Wait List have an average wait time of 45.2 months.
<p>*For SS-1 and SS-3 tracking, CHA defines "work-able residents" as those age 18 to 54 who are not receiving SSI, SSDI or a pension. CHA defines "employed" based on whether income from wages is recorded in Yardi, CHA's system of record.</p> <p>**For SS-8, CHA is establishing households in which all adults are compliant with the work requirement as a definition of self-sufficiency.</p>			

- Additional Metrics:**

Additional Metric	Unit of Measurement	Baseline	FY2017 Benchmark
Work Requirement Compliance Status	Number/Percent of residents in each work requirement compliance status (Compliant, Safe Harbor, Exempt, Under Legal, Non-compliant)	As of 12/31/12: 49% (4,149) compliant 27% (2,292) exempt 20% (1,724) Safe Harbor 1% (71) non-compliant 3% (297) under legal	In FY2017, the percentages of residents in each work requirement compliance status will increase by 1 %; those in Safe Harbor will decrease by 1% (pending HUD approval of changes to this activity).
<p><b>Compliant:</b> Residents who are meeting the work requirement through authorized activities, including employment or other work experience opportunities, school/training participation or volunteer/community service opportunities.</p> <p><b>Exempt:</b> Residents age 55 or older or those who meet disability/caretaker or other requirements for an exemption.</p> <p><b>Safe Harbor:</b> Residents who are unable to comply with the work requirement may be eligible for Safe Harbor under certain circumstances, including but not limited too reasonable accommodation, temporary medical conditions, recent employment separation, and other circumstances that present barriers to finding/maintaining employment.</p> <p><b>Non-Compliant:</b> Non-exempt residents who are not meeting the requirement and are not approved for Safe Harbor.</p> <p><b>Under Legal:</b> Non-exempt residents who are undergoing eviction proceedings, whether for non-compliance with the work requirement or for any other reason.</p> <p>* See Chapter 8 of CHA's <i>Admissions and Continued Occupancy Policy (ACOP)</i> for more detail.</p>			

- Data Collection:** CHA tracks work requirement compliance at the time of re-examination. CHA tracks the changes in compliance status each year compared to the previous year. In addition, CHA tracks income and employment outcomes for work-able heads of household as well as contribution toward rent, average subsidy, engagement in services and average time for applicants on the wait list.
- Authorization:** Attachment D, Paragraph 21 of CHA's Amended and Restated MTW Agreement which gives CHA authority to implement a work requirement as a condition of tenant occupancy in public housing.

***Office of the Ombudsman (2008-01)***

- **Description and Impact:** CHA established the Office of the Ombudsman in FY2008 to address the concerns of public housing residents in mixed-income communities. The Ombudsman serves as a liaison between residents and CHA leadership, while providing a forum for residents to learn about the benefits and offerings in the mixed-income communities. The Ombudsman holds meetings for public housing residents renting in mixed-income developments by region. Residents and other community members are provided an opportunity to share comments and concerns at these meetings, and comments are collected, responded to, and posted on CHA's website. The impact of this activity is that, by providing designated CHA staff to assist public housing residents in mixed-income communities in resolving any public housing related issues that may arise, residents are able to adapt to their new communities.
- **Implementation Year:** FY2008
- **Statutory Objective:** MTW Statutory Objective II: Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
- **Status Update:** The Office of the Ombudsman continues to address resident concerns and engage in community building activities. The focus is increasingly on encouraging residents to access available services through the Ombudsman by connecting residents with community and social service organizations. More residents are resolving their issues with Property Management.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark
SS-5: Households Assisted by Services that Increase Self-Sufficiency	Number of households receiving services aimed to increase self-sufficiency (increase).	0 residents engaged before the Office of the Ombudsman existed.	500 residents engaged through the Office of the Ombudsman in FY2016.

- **Additional Metrics:**

Additional Metric	Unit of Measurement	Baseline	FY2017 Benchmark
Regional meetings to engage residents	Number of meetings held	0 meetings held before the creation of the Office of the Ombudsman.	Minimum of four meetings for mixed-income residents in FY2017.

- **Data Collection:** CHA tracks the number of residents engaged through the Office of the Ombudsman, the number of meetings and resident participants, and the posting of meeting notes and responses on CHA's website.
- **Authorization:** Attachment D, Paragraph 20 of CHA's Amended and Restated MTW Agreement, which waives provisions of 24 CFR 964.18 as well as 24 CFR 964 Subpart B.

**MTW Activities Related to HCV Program*****Exception Payment Standards (2010-02)***

- **Description and Impact:** In FY2010, CHA received HUD approval to implement exception payment standards that exceed the standard limit of 110% of HUD's published Fair Market Rents (FMRs) for the City of Chicago.<sup>[1]</sup> Following an extensive analysis in FY2014, CHA lowered the limit for exception payment standards to no more than 150% of HUD FMR for all new requests with phase out of existing exception payments that exceed 150% over the next three years.

Exception payment standards are part of CHA's strategy to expand housing choices for HCV participants through access to Opportunity Areas throughout Chicago. CHA currently defines Opportunity Areas as census tracts with low poverty and low subsidized housing (in addition to some census tracts with low poverty, moderate subsidized housing, and improving community economic characteristics). Approval of exception payment standards is determined on a case-by-case basis. CHA will approve an exception payment standard only in the following cases:

1. CHA has approved a reasonable accommodation for the family; or
2. The family is residing in or moving into a CHA-designated Opportunity Area.

The impact of this activity is an increase in housing opportunities in neighborhoods designated as Opportunity Areas that typically may have higher rents.

- **Implementation Year:** FY2010
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Status Update:** In FY2016, CHA continued to transition families impacted by the new policy that lowers the limit for exception payment standards to 150% of FMR. Approximately 260 families were affected by this change and most are required to move. CHA's Mobility Program will continue to provide mobility counseling to those affected by this transition and to all voucher holders to encourage residents to move to Opportunity Areas. CHA will continue to evaluate the implementation of exception payment standards in the future.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark
HC-5: Increase in Resident Mobility	Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	In FY2012, 37 households were able to move to a better unit and/or neighborhood of opportunity with exception payment standards.	In FY2017, 1460 households will lease in Opportunity Areas with exception payment standards, including new and existing leases.

- **Data Collection:** CHA tracks the number of HCV participants living in CHA-designated Opportunity Areas with exception payment standards.

<sup>[1]</sup> In FY2010, CHA received approval to implement exception payment standards that may be up to 300% of HUD's Fair Market Rents (FMRs).

- **Authorization:** Attachment C, Section D(2)(a-c) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of Section 8(o)(1-3), 8(o)(7), and 8(o)(10) of the 1937 Act and 24 C.F.R. 982.308, 982.503, 982.507, 982.508, 982.518, and 982.451.

***Owner Excellence - Acceptance of Passed Annual or Initial HQS Inspection for New Request for Tenancy Approval within 90 Days of Passed Date (2011-02)***

- **Description and Impact:** As part of the HCV Owner Excellence Program, and for units with a UEP (now IEP) designation only, CHA is authorized to approve tenancy for a unit that passed inspection within the previous 90 calendar days without conducting a new inspection for each Request for Tenancy Approval [RTA] received. The purpose of this activity is to provide incentives to retain high quality owners and units, to continue to provide viable housing options for HCV participants.
- **Implementation Year:** FY2012 (approved FY2011)
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low income families; MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.  
**Status Update:** In response to the small number of units which utilized this benefit, CHA decided to place this activity on hold in FY2016. Since then, CHA has modified the Owner Excellence Program and drastically increased the number of units that can potentially qualify for this benefit, among other benefits offered by the new program. CHA's new program is called the Inspection Excellence Program and it provides benefits to units that pass two consecutive, regularly scheduled inspections. Such benefits include biannual inspections for certain units and a landlord's ability to self-certify minor fail items. The response to this program has been overwhelming positively and the number of units that qualify for benefits continues to grow. Previously, the number of units that had the ability to receive benefits under this MTW Activity was less than 2,000. Now, however, since beginning the new Inspection Excellence Program, approximately 5,400 units have qualified for benefits. CHA would therefore like to reinstate this activity as it now believes that more units would qualify and a greater number of landlords would be able to benefit from this activity. Landlords who choose to participate in the HCV Program would now find it less administratively burdensome and it provides an additional incentive to landlords who keep their units in the HCV Program. Finally, it helps reduce costs to the CHA by not having to conduct another inspection on a unit which passed inspection less than three months before.

Standard Metric	Unit of Measurement	Baseline	2017 Benchmark
HC-5 Increase in Resident Mobility	Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	In FY2015, 0 households leased IEP units where a passed annual or initial inspection was transferred (passed inspection within 90 days of RTA receipt).	In FY2017, CHA anticipates 15 units will benefit from passed initial and annual inspections within 90 days of RTA receipt.
CE-1: Agency Cost Savings	Total cost of task (in dollars).	In FY2015, CHA spent \$89,568 on regular (annual) and initial inspections for IEP units (933 IEP inspections x \$96 per inspection).	In FY2017, CHA anticipates cost savings of \$1,440 from passed annual or initial inspections.
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	In FY2015, CHA would have spent 858 staff hours on initial inspections	In FY2017, CHA anticipates time savings of 13.8 staff hours from

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		for IEP units (933 IEP inspections x .92 hours per inspection).	passed annual or initial inspections.
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- **Data Collection:** CHA tracks the number of new households who lease available UEP units where a passed annual or initial inspection result transferred CHA is currently automating the process to transfer a passed annual or initial inspection. CHA estimates the cost of an initial/annual inspection is \$96 and takes .92 staff hours (55 minutes). However, CHA will develop new estimates for staff time and cost of initial/annual inspections by the end of FY2015. The HCV analyses will reflect updates associated with new contracts for administration of the HCV program.
- **Authorization:** Attachment C, Section D (5) of the MTW Agreement which waives certain provisions of Section 8(o) (8) of the 1937 Act and 24 CFR 982 Subpart I.

### ***HCV Vacancy Payments (2011-03)***

- **Description and Impact:** As part of CHA's Inspection Excellence Program (formerly OEP and UEP), CHA is authorized to provide a modest vacancy payment to participating owners who re-lease unit in the IEP program to another HCV participant. CHA will provide vacancy payments to eligible owners upon the execution of a new HAP contract for a re-leased IEP unit. One-hundred percent of the previous family's HAP amount will be paid to participating owners for the vacant period not to exceed 60 days. The unit shall be deemed vacant (A) commencing on the first day for which HAP is not paid for the unit following completion of a move out or termination of the lease, and (B) ending on the day preceding the first day for which HAP is paid for such unit based on the execution of a new HAP with CHA. The purpose of this activity is to provide incentives to retain high quality owners and units in the program, and to continue to provide viable housing options for families.
- **Implementation Year:** FY2012 (approved FY2011).
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low income families.
- **Status Update:** As of June 2016, based on historical average, CHA estimates the approval of 65 vacancy payments in FY2016 for a total cost of \$49,775. In FY2014, CHA began an evaluation of the OEP program and the evaluation is ongoing. CHA will continue to review vacancy payments data to evaluate and ensure the financial sustainability of this activity.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark
HC-2: Units of Housing Preserved	Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	9 UEP units preserved through vacancy payments in FY2012.	107 units will be preserved through a vacancy payment in FY2017

- **Data Collection:** CHA tracks the number of UEP units preserved in the HCV program through vacancy payments.
- **Authorization:** Attachment C, Section D(1) (d) of the MTW Agreement which waives certain provisions of Sections 8(o) (9) of the 1937 Act and 24 CFR 982.311.

### ***MTW Activities Related to Property Rental Assistance Program/Project-Based Vouchers***

#### ***Exceed the Limit of 25% Project-Based Voucher Assistance in Family Properties (2008-02)***

- **Description and Impact:** CHA is authorized to increase the percent of assisted PBV units in certain projects above the regulatory limit of 25% per family building. CHA uses this flexibility to create innovative funding structures for PBV developments and enhance its Property Rental Assistance Program. The impact of making

PBVs available in excess of the 25% limit is that more developers are enticed to preserve or create affordable housing, increasing the availability of quality housing options throughout Chicago's communities for low-income individuals and families.

- **Implementation Year:** FY2008
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Status Update:** CHA will continue to identify opportunities to increase the number of PBV units in family properties with new contracts and existing contract renewals in 2017.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark
HC-1: Additional Units of Housing Made Available	Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0 additional PBV units were made available by exceeding 25% in family PBV properties prior to FY2008.	0 additional PBV units were made available by exceeding 25% in family PBV properties.
HC-2: Units of Housing Preserved	Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	0 housing units for low-income households were preserved by exceeding 25% in family PBV properties prior to FY2008.	0 housing units for low-income households were preserved by exceeding 25% in family PBV properties.

- **Data Collection:** CHA tracks the number of additional PBV units in family properties made available through the flexibility to exceed the 25% limit.
- **Authorization:** Attachment D, Paragraph 6 of CHA's Amended and Restated MTW Agreement which waives Section 8(o)(13)(D)(i) of the 1937 Act and 24 CFR 983.56. This waiver provides CHA with the ability to supply more affordable housing units in family PBV buildings.

#### ***PBV Contract Commitments with 16-30 Year Initial Terms (2011-05)***

- **Description and Impact:** To facilitate the expansion of affordable housing opportunities through the use of project-based vouchers, CHA enters into new PRA Program project-based voucher HAP contracts for an initial term between one and 30 years. CHA utilizes MTW authority to enter into contracts that have an initial term of 16-30 years. CHA's relevant contracts include a clause stating that the duration period is pursuant to CHA's MTW authorizations. The impact of this activity is that it will assist developers to obtain better financial terms and help to ensure the long-term availability of quality affordable housing. Through this activity, contracts with an initial term of 16-30 years do not have the 15-year extension option.
- **Implementation Year:** FY2011
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low income families.
- **Status Update:** CHA will continue to identify opportunities to increase the initial term of PBV HAP contracts to 16-30 years in 2017.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark
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CE-1: Agency Cost Savings	Total cost of task in dollars (decrease).	0 PBV units made available with 16-30 year contracts prior to implementation.	0 PBV units made available with 16-30 year contracts
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	0 PBV units preserved with 16-30 year contracts prior to implementation.	0 PBV units made available with 16-30 year contracts

- Data Collection: CHA tracks the number of additional PBV units that are made available through executed HAP contracts with initial terms of 16 to 30 years.
- Authorization: Attachment C, Section D (1)(a) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of Section 8(o)(7) and 8(o)(13) of the 1937 Housing Act and 24 C.F.R. 983 Subpart E.

#### ***Acceptance of City Certificates of Occupancy for Initial PRA Inspections (2011-06)***

- Description and Impact: For the PRA Program, CHA reduces the number of inspections required prior to lease-up of project-based voucher developments that are new construction or substantial rehabilitation. In cases involving such properties, CHA considers Certificates of Occupancy issued by the City of Chicago as evidence of the property's compliance with Housing Quality Standards. CHA will not perform initial inspections on such units prior to entering into the PRA Housing Assistance Payment (HAP) contracts. The impact of this activity is to reduce costs by reducing the number of inspections conducted by staff, as well as the associated tenant inconvenience in developments that have additional governmental funding such as tax credits and state-financed loans.
- Implementation Year: FY2011
- Statutory Objective: MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- Status Update: In FY2017, CHA plans to spend approximately \$4,844 on initial PRA inspections and 135 staff hours for the allocation of initial PRA inspections for units that are not new construction or will require substantial rehab.
- Standard Metrics:

Standard Metric	Unit of Measurement	Baseline^	FY2017 Benchmark
CE-1: Agency Cost Savings	Total cost of task in dollars (decrease).	In FY2011, CHA spent \$5,054 for initial PRA inspections (351 units x \$14.40 per year).	In FY2017, CHA will spend \$4,844 on initial PRA inspections. (147 units x \$32.95 per year)
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	In FY2011, 176 hours of staff time were dedicated to initial PRA inspections for new construction and substantial rehab units (351 units x .50 hours).	In FY2017, 135 hours of staff time will be dedicated to initial PRA inspections for new construction and substantial rehab units. (147 units x .92 hours)

^Since the baseline was established, CHA has updated the cost of conducting initial PRA inspections to \$32.95 from \$14.40, and has also updated the estimated inspection time to .92 hours

- **Data Collection:** CHA estimates the cost of conducting initial PRA inspections per unit is \$32.95. CHA tracks the decrease in costs and staff time associated with accepting Certificates of Occupancy issued by the City of Chicago for initial inspections. CHA currently estimates it takes .92 hours to conduct an inspection.
- **Authorization:** Attachment C, Section D(7)(d)(ii) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of Section 8(o)(8) of the 1937 Housing Act and 24 C.F.R. 982 Subpart I.

***Payments during Initial Occupancy/Leasing for New Construction and Substantially Rehabilitated Properties (2011-08)***

- **Description and Impact:** To provide an incentive for participation in CHA's PRA Program and to ensure the long-term viability of newly constructed and substantially rehabilitated properties, CHA provides vacancy payments, as determined necessary on a project by project basis, during the initial operating lease-up period. Such an approach is consistent with practices in the affordable housing industry (e.g., initial operating reserve for tax-credit properties, provision of operating subsidy for mixed-finance and public housing properties, and allowable vacancy payments from execution of contract to initial occupancy in the Moderate Rehabilitation Program). These payments allow new developments to maintain a positive cash position in meeting operating expenses when all of the PBV units are not leased.

CHA is authorized to make payments for a period not to exceed 90 days from the execution of the HAP contract. These vacancy payments are equal to 50% of the contract rent for the initial 60 days of the vacancy. CHA may determine that there is a reasonable opportunity to refer an applicant from its waiting list and may elect to pay an additional vacancy payment of 100% of the contract rent for the additional 30 days. Under no circumstances will the vacancy payments exceed the 90-day period. Payments are contingent on the owner demonstrating compliance with program rules, including taking all feasible actions to fill the vacancies and not rejecting eligible applicants except for good cause acceptable to CHA. Further, CHA does not compensate landlords for units that receive funding from another source.

- **Implementation Year:** FY2012
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low income families.
- **Status Update:** In FY2017, CHA plans to spend approximately \$44,338 in payments during initial occupancy/leasing for new construction and substantially rehabilitated properties. These vacancy payments are equal to 50% of the contract rent for up to the initial 60 days of the
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark
HC-1: Additional Units of Housing Made Available	Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0 PBV units made available through vacancy payments during initial leasing prior to the implementation of the activity.	In 2017, 47 PBV units will be made available through vacancy payments during initial leasing periods.

- **Data Collection:** CHA tracks the number of PRA developments and number of units that are made available through vacancy payments during initial leasing as well as the associated costs.
- **Authorization:** Amendment No. 6 to CHA's Amended and Restated MTW Agreement which authorizes implementation of approved local, non-traditional activities using MTW funds.

***Expansion of Public Housing Earned Income Disallowance Policy to CHA RAD Properties (2016-03)***

- **Description and Impact:** CHA is participating in the Rental Assistance Demonstration (RAD) program and is working to transition more than 10,000 public housing units to Project-Based Vouchers (PBV) through RAD. HUD regulations state that the Earned Income Disregard (EID) policy is only available to residents with disabilities for the Housing Choice Voucher (HCV) program. For public housing sites transitioning to PBV under the RAD program, including RAD PBV transfer of assistance. CHA is proposing to retain the EID policy for residents in RAD PBV units, which will allow any eligible resident, including non-disabled persons, to have the opportunity to utilize EID.

As of February 2016, 17 households in sites transitioning to RAD PBV have an EID exclusion. CHA is requesting this authorization to prevent undue hardship on current and future working heads of household and families in sites that transition to RAD.

- **Implementation Year:** proposed FY2016. Pending HUD approval of FY2016 Annual Plan Amendment, CHA will implement this activity.
- **Statutory Objective:** MTW Statutory Objective II: Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
- **Status Update:** CHA will implement this activity in FY2016 and implementation will be ongoing in FY2017.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark
SS-1: Increase in Household Income*	Average earned income of households affected by this policy in dollars (increase).	In FY2015, the average income from wages for households in RAD PBV sites with a "work-able" adult was \$14,091 (405 households).	In FY2017, the number of and average income from wages for households in RAD PBV sites is expected to remain stable at approximately \$15,000 (assuming a small adjustment for inflation).
SS-3: Increase in Positive Outcomes in Employment Status*	Other category:  Having earned income	154 "work-able" heads of household in RAD PBV sites had income from wages in FY2015.  66% of "work-able" heads of household in RAD PBV sites had income from wages in FY2015.	In FY2017, the number of "work-able heads of households in RAD PBV sites, as well as the percentage of said households with income from wages is expected to remain stable at approximately 155 and 66%, respectively.
*For SS-1 and SS-3 tracking, CHA defines "work-able residents" as those age 18 to 54 who are not receiving SSI, SSDI or a pension. CHA defines "employed" based on whether income from wages is recorded in Yardi, CHA's system of record.			

- **Data Collection:** CHA tracks EID participation at the time of re-examination. CHA will track income and employment outcomes for work-able heads of household in RAD PBV sites.
- **Authorization:** Attachment C, Section D(2)(a) of CHA's Amended and Restated MTW Agreement which allows CHA to adopt policies to calculate the tenant portion of the rent that differ from current Housing Choice Voucher (HCV) program requirements.

***Uniform Physical Condition Standards (UPCS) Inspection Standards for PBV Properties within the RAD Program (2016-04)***

- **Description and Impact:** As a participant in the RAD program, CHA is evaluating administrative processes to better streamline the agency's role as Contract Administrator for the program. One primary responsibility of the Contract Administrator is to conduct inspections to ensure RAD PBV units and buildings meet HUD standards. For RAD and the Housing Choice Voucher (HCV) Program, HUD requires Housing Quality Standard (HQS) inspections. CHA is requesting authorization to continue utilizing public housing Uniform Physical Condition Standards (UPCS) for inspections in CHA public housing properties/units transitioning to PBV properties under the RAD program, including RAD PBV transfer of assistance sites. CHA is proposing to retain the UPCS inspection criterion because it is considered a more stringent set of standards for inspections when compared to HQS, therefore ensuring a better housing product. In addition, CHA anticipates this activity will be cost effective.
- **Implementation Year:** proposed FY2016. Pending HUD approval of FY2016 Annual Plan Amendment, CHA will implement this activity.
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:** CHA will implement this activity in FY2016 and implementation will be ongoing in FY2017.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark
CE-1: Agency Cost Savings	Total cost of task in dollars (decrease).	In FY2015, CHA spent \$113,067 on inspections in sites transitioning to RAD PBV.	In FY2017, CHA anticipates spending approximately \$113,000 on inspections in sites transitioning to RAD PBV.

- **Data Collection:** CHA will track the cost of inspections for RAD PBV sites.
- **Authorization:** Attachment C, Sections D(5) and D(7)(d) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of Section 8(o)(8) of the 1937 Housing Act and 24 C.F.R. 982 Subpart I.

***Adjusting Fair Market Rent (FMR) Thresholds to Retain Existing Subsidy Levels for Converting to PBV Properties within the RAD Program (2016-06)***

- **Description and Impact:** In an effort to retain consistent housing quality and services across the PBV RAD portfolio of RAD properties, CHA is requesting authorization to exceed the Fair Market Rent (FMR) cap of 110% for RAD PBV properties (under current standard Project-Based Voucher rules), as needed to retain the subsidy level CHA currently receives for properties. FMR is one of three criteria used to set initial contract rents under the RAD program – the other two criteria are current subsidy levels and reasonable (market) rents; the lower of the three applies.

CHA has conducted an initial contract rent analysis using the aforementioned criteria. Of the 33 senior properties analyzed, nine were negatively impacted by the 110% of FMR cap imposed by current PBV rules. CHA is proposing that a cap up to 120% of FMR is necessary for certain properties to retain current subsidy levels.

CHA has made a commitment to, at minimum, retain existing services and property maintenance at the level residents experience today. The increase of the cap from 110% to 120% of FMR would better safeguard the impacted CHA communities against a reduction in funds that could impact operations, service levels, and appropriate capital investments. As RAD was designed by HUD to be a budget-neutral program to preserve subsidized housing, the requested flexibility would allow CHA to retain current subsidy levels and maintain

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current standards for operating RAD PBV sites. Further, the requested increase to up to 120% of FMR is consistent with the rent cap for RAD Project-Based Rental Assistance (PBRA) properties.

- **Implementation Year:** proposed FY2016. Pending HUD approval of FY2016 Annual Plan Amendment, CHA will implement this activity in FY2017
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Status Update:** CHA will implement this activity in FY2016 and implementation will be ongoing in FY2017.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2017 Benchmark
HC-2: Units of Housing Preserved	Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	In FY2015, 2,242 dwelling units were available in nine properties transitioning to RAD PBV that may require an increased FMR threshold to maintain current standards for property operations.	In FY2017, 2,242 dwelling units across the nine impacted properties transitioning to RAD PBV will remain within the RAD portfolio, as the contract rent is expected to be sufficient to maintain comparable property operations standards as of FY2015.

- **Data Collection:** CHA will track the number of available dwelling units in applicable RAD PBV sites.
- **Authorization:** Attachment C, Section D(2)(a) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of Section 8(o)(1-3), 8(o)(10), and 8(o)(13(H-I)) of the 1937 Act and 24 C.F.R. 982.508, 982.503, and 982.518.

### Summary of Implemented MTW Activities

FY2017 Implemented MTW Activities				
Housing and Development				
MTW Activity Number	Ongoing MTW Activity	Description	Statutory Objective	Authorization
2000-01	Revitalization of 25,000 Units	CHA continues to make progress toward the goal of 25,000 housing units and providing additional housing opportunities for residents.	Increase Housing Options	Attachment D, Paragraph 1 and MTW Agreement, Amendment 3
2010-01	Alternative Reasonable Cost Formula for Redevelopment and Rehabilitation	HUD approved the reasonable cost formula for redevelopment in FY2010. CHA will utilize the reasonable cost formula for redevelopment, which was approved in FY2010, for both redevelopment and rehabilitation projects.	Increase Housing Options	Attachment C, Section C(16)

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2015-01	Expedited Public Housing Unit Acquisition	CHA is authorized to use MTW flexibility to support CHA's Real Estate Acquisition Program and to expedite the acquisition of units and/or buildings as public housing units in CHA- designated Opportunity Areas as well as Gautreaux-designated General and Revitalizing Areas.	Increase Housing Options	Attachment C, Section C(13); Attachment C, Section B2
<b>Public Housing and HCV</b>				
MTW Activity Number	Ongoing MTW Activity	Description	Statutory Objective	Authorization
2009-01	\$75 Minimum Rent for Public Housing and HCV Programs	CHA increased the minimum rent from \$50 to \$75 in FY2009.	Reduce Costs and Cost Effectiveness	Attachment C, Section C(11) and Attachment C, Section D(2)
2011-01	Choose to Own Homeownership Program for Public Housing and HCV	CHA expanded the Choose to Own (CTO) Home Ownership Program beyond HCV participants to current CHA public housing residents.	Increase Housing Options  Self- Sufficiency	Attachment C, Section B, Paragraph 1(b)(iii), and Attachment C, Section D, Paragraph 8 (a-b)
2014-02	Triennial Re-examinations for Households with only Elderly/Disabled Participants and Fixed Income for HCV and Public Housing	CHA proposes to implement a streamlined triennial re-examination schedule for public housing and HCV fixed income households consisting of only elderly and/or disabled participants.	Reduce Costs and Cost Effectiveness	Attachment C, Section C (4) and Attachment C, Section D (1)(c)
2014-04	CHA Re-Entry Pilot Program	CHA received HUD approval to implement a Re-entry Pilot Program for up to 50 eligible participants in CHA traditional public housing or CHA's HCV Program.	Increase Housing Options	Attachment C, Section B(4)
2016-02	Mobility Counseling Demonstration Program Work Requirement	Pending approval of the FY2016 MTW Annual Plan, CHA will implement a work requirement for applicants who consent to participation in the Mobility Counseling Demonstration Program and move to either a CHA Opportunity or Gautreaux-designated General Area utilizing a tenant-based Housing Choice Voucher.	Self- Sufficiency	Attachment C, Section D(3)(b)
2006-01, 2014-03	Biennial Re-examinations for Public Housing and HCV	CHA plans to implement biennial re-examinations for public housing residents and will continue to implement biennial re-examinations for HCV program participants.	Reduce Costs and Cost Effectiveness	Attachment C, Section D (1) (c), and Section C (4)
<b>Public Housing</b>				
MTW Activity Number	Ongoing MTW Activity	Description	Statutory Objective	Authorization

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2009-02	Public Housing Work Requirement	CHA implemented a work requirement across CHA's public housing portfolio. CHA provides case management and workforce development resources to residents to assist them in fulfilling this requirement.	Self-Sufficiency	Attachment D, Paragraph 21
2008-01	Office of the Ombudsman	The Office of Ombudsman provides designated staff to address the concerns of public housing residents living in mixed-income communities and serves as a liaison between residents and CHA leadership.	Self-Sufficiency	Attachment D, Paragraph 20
<b>HCV</b>				
<b>MTW Activity Number</b>	<b>Ongoing MTW Activity</b>	<b>Description</b>	<b>Statutory Objective</b>	<b>Authorization</b>
2010-02	Exception Payment Standards	CHA is authorized to apply exception payment standards that may be up to 300% of HUD's published Fair Market Rents (FMRs) for the City of Chicago in order to increase housing options in opportunity areas throughout Chicago.	Increase Housing Options	Attachment C, Section D(2)
2011-02	Owner Excellence - Acceptance of Passed Annual or Initial HQS Inspection for New Request for Tenancy Approval within 90 Days of Passed Date	CHA is authorized to approve tenancy for a unit that passed inspection within the previous 90 calendar days without conducting a new inspection for each Request for Tenancy Approval (RTA) received.	Increase housing choices for low income families	Attachment C, Section D (5)
2011-03	HCV Vacancy Payments	As part of the HCV Owner Excellence Program, CHA may provide a modest vacancy payment to eligible owners participating in the Owner Excellence Program who re-lease a unit currently in the HCV program to another HCV participant.	Increase Housing Options	Attachment C, Section D(1)(d)
<b>PRA</b>				
<b>MTW Activity Number</b>	<b>Ongoing MTW Activity</b>	<b>Description</b>	<b>Statutory Objective</b>	<b>Authorization</b>
2008-02	Exceed the Limit of 25% Project-Based Voucher Assistance in Family Properties	CHA may increase the percent of assisted PBV units in certain projects above the regulatory limit of 25% per family building.	Increase Housing Options	Attachment D, Paragraph 6
2011-05	PBV Contract Commitments with 16-30 Year Initial Terms	To facilitate the expansion of affordable housing opportunities through the use of PBVs, CHA uses MTW authority to enter into HAP contracts for initial terms between 16-30 years.	Increase Housing Options	Attachment C, Section D (1)(a)
2011-06	Acceptance of City Certificates of Occupancy for Initial PRA Inspections	CHA is authorized to accept the issuance of Certificate of Occupancy by the City of Chicago as evidence of the property's compliance with Housing Quality Standards for initial PRA inspections.	Reduce Costs and Cost Effectiveness	Attachment C, Section D(7)(d)

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2011-08	Payments During Initial Occupancy/Leasing - New Construction and Substantially Rehabilitated Properties	CHA provides vacancy payments, as determined necessary on a project by project basis, during the initial operating lease-up period in order to provide an incentive for owner participation and to ensure the long-term viability of newly constructed and substantially rehabilitated properties.	Increase Housing Options	MTW Agreement, Amendment 6
2016-03	Expansion of Public Housing Earned Income Disallowance Policy to CHA PBV Programs within the RAD Program	CHA will retain the public housing EID policy for residents in properties transitioning to RAD PBV.	Self-Sufficiency	Attachment C, Section D(2)(a)
2016-04	Uniform Physical Condition Standards (UPCS) Inspection Standards for PBV Properties within the RAD Program	CHA will continue utilizing UPSC for inspections in properties transitioning to RAD PBV.	Reduce Costs and Cost Effectiveness	Attachment C, Section D(7)(d)
2016-06	Adjusting Fair Market Rent (FMR) Thresholds to Retain Existing Subsidy Levels for Converting to PBV Properties within the RAD Program	CHA may exceed the FMR cap of 110% for RAD PBV properties, as needed, to retain existing subsidy levels.	Increase Housing Options	Attachment C, Section D(2)(a)

### **Activities on Hold**

There are no activities on hold for FY2017.

### **Closed Out Activities**

The following MTW activity will be closed out in FY2017.

#### ***Authorization of Qualified PRA Owners/Property Managers to Perform Initial Eligibility Determinations and Re-examinations (2011-04)***

- **Description and Impact:** CHA has authority to train and certify qualified owners, as defined by CHA, in the Property Rental Assistance (PRA) Program to perform initial tenant eligibility determinations and re-examinations of PBV participants. CHA will require the owners to enter re-examination and initial eligibility data into CHA's systems of record for transmission to HUD PIC, will monitor owner performance monthly, and will perform comprehensive quality control reviews. However, CHA will continue to monitor EIV for income verification and participating owners will not be granted access to this function. The anticipated impact of this activity is to reduce costs, to minimize the duplication of effort, and to administer the PRA program using a best practices model for privately-managed mixed-income and public housing developments.
- **Implementation Year:** FY2012 (approved FY2011)
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:** This activity was closed out. The function and the cost is included in the fee structure of an existing contract with a third-party vendor.

#### Section IV: Approved MTW Activities: HUD Approval Previously Granted

- Authorization: Attachment C, Section D (1)(a), (1)(c), and 3(b) of CHA's Amended and Restated MTW Agreement, which waive certain provisions of Sections of 8(o)(5) and 8(o)(7) of the 1937 Act and 24 C.F.R. 982.162, 24 C.F.R. 982.516, and 982 subpart E.



# Section Five

## **MTW SOURCES AND USES OF FUNDS**

## Section V: MTW Sources and Uses Funds

This section contains information on CHA's anticipated sources and uses of funding in FY2017.

### Section V-A: Sources and Uses of MTW Funds

#### *Estimated Sources of MTW Funding for FY2017*

The following table shows projected sources of MTW funding in FY2017.

Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$50,580,768
70600	HUD PHA Operating Grants	\$647,168,654
70610	Capital Grants	\$178,494,924
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$2,963,486
71100+72000	Interest Income	\$2,000,000
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$5,850,106
70000	Total Revenue	\$887,057,938

#### Explanations of CHA FY2017 MTW Sources:

- FY2017 estimates for operating subsidies are based on units in PIC at projected per unit rates and Housing Choice Voucher Program sources are based on projected FY2017 voucher counts. CHA continues to finalize MTW HCV leasing projections for FY2017.
- CHA anticipates utilizing reserves for capital expenditures. Those reserves are not reported as FDS line items and are not reflected as sources above.

#### *Estimated Uses of MTW Funding for FY2017*

The following table shows projected uses of MTW funding in FY2017.

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$46,401,988
91300+91310+92000	Management Fee Expense	\$0
91810	Allocated Overhead	\$49,942,562

92500 (92100+92200+92300+92400)	Total Tenant Services	\$72,196,887
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$25,925,015
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$81,084,329
95000 (95100+95200+95300+95500)	Total Protective Services	\$25,569,311
96100 (96110+96120+96130+96140)	Total insurance Premiums	\$5,126,000
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$14,164,449
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$961,116
97100+97200	Total Extraordinary Maintenance	\$10,000,000
97300+97350	Housing Assistance Payments + HAP Portability-In	\$471,988,681
97400	Depreciation Expense	\$136,811,113
97500+97600+97700+97800	All Other Expenses	\$825,750
90000	Total Expenses	\$940,997,201

**Reconciliation to CHA's 2017 Preliminary Budget**

Total Expenses	\$940,997,201
Add back: Depreciation	(\$136,811,113)
Deduct: Capital Expenditures	\$272,380,912
Principal	\$1,285,000
Total Expenses	<u>\$1,077,852,000</u>
Use of: Reserves	114,462,000
Third-party financing	76,332,062
Total Reserves/Bond proceeds	<u>190,794,062</u>

**Explanations of CHA FY2017 MTW Uses**

- The estimated Housing Assistance Payments expense is based on 90% voucher utilization in FY2017. CHA continues to finalize MTW HCV leasing projections for FY2017.
- Interest income is derived from the Cash and Cash Equivalents and the Investments at Fair Value as presented on the Statement of Net Position in CHA's Comprehensive Annual Financial Report.
- Uses do not reflect planned capital expenditures described in Section II. These are not reported as FDS line items.
- Depreciation is included in Uses based on the FDS line item. CHA reports depreciation as an expense (rather than a use), per standard accounting practices.

***Activities that Used Only MTW Single-Fund Flexibility***

The following section describes CHA's use of MTW single-fund flexibility.

**Describe the Activities that Used Only MTW Single Fund Flexibility**

The table below outlines CHA's use of the MTW single fund for FY2017, with projected expenditures by category based on CHA's FY2017 budget. (This includes projected reserve expenditures of \$114.5M, which are outlined at the end of this section.)

CHA continues to use single fund flexibility by designing and/or continuing to implement local activities, including new initiatives related to Plan Forward as described in Section I.

CHA uses capital dollars as well as Section 8 MTW Block Vouchers from the single fund to support ongoing revitalization activities, in an effort to further advance the progress of the original Plan and implement applicable new Plan Forward initiatives. Section II describes capital expenditures and specific development and capital activities planned for FY2017.

Through the use of MTW funds, CHA also continues to implement numerous resident service initiatives including Support to Families Being Relocated, Self-Sufficiency Services, Youth Empowerment Services and Quality of Life Services. (More detail on resident services initiatives is provided in the below section.)

**THE CHICAGO HOUSING AUTHORITY  
USE of MTW SINGLE FUND  
FY2017 ANNUAL PLAN**

	<u>FY2017 Single Fund</u>
<b>CENTRAL OFFICE</b>	<b>\$ 55,659,728</b>
 <b><u>HOUSING</u></b>	
Housing Choice Voucher	491,502,635
Property Office	181,813,238
Resident Services	41,741,087
<b>TOTAL HOUSING</b>	<b>715,056,960</b>
 <b><u>CAPITAL</u></b>	
Capital Repairs and Improvements	124,813,850
Capital Development	66,135,000
Capital Administration	10,436,023
<b>TOTAL CAPITAL</b>	<b>201,384,873</b>
 <b>DEBT SERVICE</b>	<b>2,246,116</b>
 <b>TOTAL USES</b>	 <b>\$ 974,347,677</b>

CHA Amended FY2017 MTW Annual Plan- Submitted to HUD 8.25.17

Current Support to Families in the Process of Being Relocated

CHA provides a variety of support options to families in the process of being relocated from buildings undergoing rehabilitation or redevelopment as part of Plan Forward. In accordance with the Relocation Rights Contract, CHA provides relocation notices to families impacted by building closures or consolidation and makes move-related payments. Additionally, residents are offered pre-move counseling, HCV mobility counseling, post-move counseling, unit tours, assistance in accessing other necessary services and support for residents in managing their household and adjusting to new communities. CHA also provides packing materials and moving assistance to families who are relocating.

Support Services for Families

CHA currently offers public housing families living in CHA properties or temporarily utilizing a Housing Choice Voucher a variety of case management and workforce development services, as well as select services to other HCV residents. These services focus on four main goals, each with measurable outcomes, including permanent housing choices, lease compliance, and employment preparation, placement and retention. A summary of the services planned for FY2017 is below.

*Increasing Economic Independence:*

- **Transition counseling.** Assistance for families to overcome social and emotional barriers to leaving subsidized housing.
- **Housing locator assistance.** Help finding appropriate, affordable housing in the private or affordable market for families transitioning off of subsidy or moving to an Opportunity Area.
- **Choose to Own homeownership program.** Financial assistance toward the mortgage payment, pre- and post-purchase homebuyer education, credit counseling and other services to help families navigate the home-buying process.
- **Family Self-Sufficiency program.** Focused assistance in reaching self-sufficiency goals, including escrow accumulation.

*Projected FY2017 Outcomes:*

- 30 families will purchase a home through the CHA Choose to Own homeownership program.
- 65% of participants in the Family Self-Sufficiency program will accumulate escrow.

*Increasing Earning Power:*

**Employment placements.** Job readiness training to prepare residents for work; assistance finding a job; follow-up to foster, promote, and enhance job retention.

- **Transitional Jobs.** Time-limited, subsidized jobs with a training component to help residents transition to permanent employment.
- **Employment readiness and placement for youth.** Starting in elementary school, career exploration programming. For older youth, job readiness training and summer placements with ongoing support.
- **Section 3.** Assist residents with registration in the new Section 3 database in order to apply for posted positions with CHA contractors.

*Projected FY2017 Outcomes:*

- 2,000 residents will be connected with new and better jobs.
- At least 2,000 youth will be engaged in paid summer opportunities.

*Developing Academic Achievement:*

- **Connections to education.** Coaching and support in accessing post-secondary education, including at the City Colleges of Chicago, where residents can attend at no cost after financial aid.
- **Scholarships.** CHA offers scholarships in amounts of \$1,000 and \$2,500 for youth and adults attending college.
- **Academic enrichment for youth.** Programs for middle school and high school aged youth to expand academic skills and prevent summer learning loss with the goal of preparing youth for college or other post-secondary education.

*Projected FY2017 Outcomes:*

- More than 600 residents will attend the City Colleges of Chicago.
- At least 220 youth and adults will receive CHA college scholarships.

*Increasing Stability and Quality of Life:*

- **Recreational programming for youth.** Sports, wellness and arts programs for youth starting at age six, including through the Chicago Park District, as well as special events throughout the year.
- **Lease violation referrals.** Assistance for families referred by their property manager to help them address lease violation issues.
- **Right of Return outreach.** Outreach and assistance for 10/1/99 families who still need to satisfy their Right of Return under the Relocation Rights Contract.
- **Clinical mental health services.** Individual and group counseling for any resident who needs it.
- **Victim Assistance.** Referral to counseling services and, if appropriate, relocation for residents who have been victims of violent crimes or trauma and who need to move for safety reasons.
- **Health initiatives.** Opportunities with CHA partners to address specific health issues such as asthma and cardiovascular health. For seniors, exercise and dance classes, health seminars, frail and emergency well-being checks, and crisis intervention.
- **Social events for seniors.** On-site, regional and city-wide activities such as clubs, classes, field trips and music events.
- **Assessments and outreach for seniors.** Ongoing one-on-one contact with seniors to identify and address issues and engage them in activities.
- **Senior referrals.** Connections to outside resources, such as assistance getting benefits, housekeeping services and transportation assistance. Many services are provided by the City of Chicago's Department of Family and Support Services (DFSS).

*Projected FY2017 Outcomes:*

- 7,000 youth will be engaged in out-of-school-time programming.
- 80% of lease compliance referrals will be resolved.
- 190,000 Golden Diner and 90,000 Summer Food meals will be served to seniors and youth.
- Percent of families with Right of Return outstanding will be maintained at 3.5%.
- Regional senior music fests and the Senior Holiday Luncheon will engage more than 2,000 seniors.

**CHA Reserves**

Total reserve fund usage budgeted for FY2017 is \$114.5M.

- Reserve funds will be used for repair and maintenance at senior housing properties, scattered site properties and family properties.
- Reserve funds will also be used to develop mixed-income projects.

**Section V-B: Local Asset Management Plan****Local Asset Management Plan**

Has the PHA allocated costs within statute during the plan year?

No

Has the PHA implemented a local asset management plan (LAMP)?

Yes

If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. It shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.

Has the PHA provided a LAMP in the appendix?

Yes

CHA implemented a Local Asset Management Plan (LAMP) in FY2008 and, though the basic components of the plan have not changed materially, CHA continually looks to ensure that the activities, accounting, and financial reporting are in keeping with the LAMP. Examples of CHA activities taken to ensure our LAMP is operating as designed include:

- The CHA property portfolio continues to be managed by professional private management companies with performance metrics and standards identified in their contracts;
- Budgeting and accounting activities are managed at the property level with a robust budgeting program in place that requires substantial internal CHA review be performed prior to approval;
- Detailed accounting activities and financial analysis efforts are performed monthly to ensure that property expenditures are within budget guidelines and appropriately reported.

CHA makes every effort to ensure that program costs are reasonable and consistently applied in accordance with the Moving to Work Agreement by recording accounting activity at the grant and property levels. As identified in the LAMP, CHA utilizes property level management, accounting, and budgeting and has established a Central Office Cost Center (COCC). Internal control considerations are a priority for the CHA and are evident in the manner in which expenditures are budgeted, authorized and reported on. Reviews are routinely performed to make certain that the appropriate segregation of duties and approval authority are in place for CHA staff and management.

Further, CHA makes certain that Generally Accepted Accounting Principles are followed by having external firms perform the required annual financial and A-133 audits. These annual audits, in addition to the quarterly reviews performed by the external firm, require significant consideration be given to program reporting as well as up-to-date accounting treatment of Governmental Accounting Standards Board (GASB) pronouncements.



# Section Six

## **ADMINISTRATIVE**



**CHA**

CHICAGO HOUSING  
AUTHORITY™

## **Section VI: Administrative**

This section contains administrative requirements and certifications that are to be submitted in CHA's MTW Annual Plan.

### ***Board Resolution***



September 20, 2016

Item No. 6

**Proposed FY2017 Moving To Work (MTW) Annual Plan**

**Recommendation**

The Chief Executive Officer recommends that the Board of Commissioners of the Chicago Housing Authority approve the FY2017 MTW Annual Plan

The requested action in this item complies in all material respects with all applicable Chicago Housing Authority board policies and all applicable federal (HUD) regulations.

**Background**

As part of the MTW Agreement, CHA is required to submit an Annual Plan to HUD, due 75 days prior to the start of CHA's fiscal year. The MTW Annual Plan provides required information on planned operations and activities for the fiscal year, including proposed new MTW activities that require HUD approval.

A 30-day public comment period was conducted from August 1 through August 31, 2016. Announcements for the public comment process appeared on CHA's website and in the Chicago Defender (August 3 & 10) and Chicago Sun-Times (August 1-5) and Hoy newspapers (August 1, 3, 5, 8, 10). CHA also distributed resident notices across public housing properties and sent an email notification to HCV participants.

During the public comment period, both residents and the public alike were able to submit comments orally and in writing, regarding the information contained in the Proposed FY2017 MTW Annual Plan. CHA held three public hearings during the 30-day comment period on August 10, 11 and 18, 2016.

Prior to finalizing the Proposed FY2017 MTW Annual Plan, CHA gave consideration to comments received during the public comment period. Public comments and CHA responses will be provided to the Board prior to approval and will be available to the public in the final plan amendment posted on CHA's website after Board approval and submission to HUD.

CHA has complied with the requirements of the Amended and Restated MTW Agreement and HUD regulations regarding annual plans and amendments.

Respectfully Submitted:

Jenny Hoyle  
Director, Strategic Management and Partnerships

**RESOLUTION NO. 2016-CHA-97**

**WHEREAS,** The Board of Commissioners has reviewed the Board Letter dated September 20, 2016 requesting approval of the Proposed FY2017 MTW Annual Plan, attached hereto;

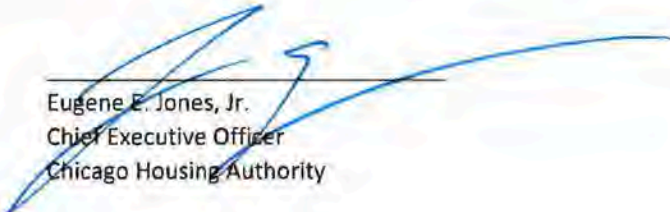
**THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE CHICAGO HOUSING AUTHORITY:**

**THAT,** The Board of Commissioners hereby approves the Proposed FY2017 Moving to Work Annual Plan and grants authorization to the Chief Executive Officer, the Board Chairperson, or their designee to make any final updates as deemed necessary;

**THAT,** This approval of the Proposed FY2017 MTW Annual Plan supersedes any and all conflicting language found in prior CHA MTW Annual Plans;

**THAT,** The Board of Commissioners grants authorization to submit the Proposed FY2017 MTW Annual Plan to the U.S. Department of Housing and Urban Development upon Board approval. Such approval shall constitute conclusive evidence of the Board's approval of any and all such changes.



  
\_\_\_\_\_  
Eugene E. Jones, Jr.  
Chief Executive Officer  
Chicago Housing Authority



July 18, 2017

Item No. 1

**Proposed FY2017 MTW Annual Plan Amendment**

Presenter: Jennifer Hoyle, Director, Strategic Management and Partnerships

**Recommendation**

The Chief Executive Officer recommends that the Board of Commissioners of the Chicago Housing Authority approve the FY2017 Moving to Work (MTW) Annual Plan Amendment and authorize CHA to submit the FY2017 MTW Annual Plan Amendment to HUD.

The requested action in this item complies in all material respects with all applicable Chicago Housing Authority board policies and all applicable federal (HUD) regulations.

**Background**

Chicago Housing Authority (CHA) is proposing an Amendment to the FY2017 MTW Annual Plan that includes one property demolition; three property dispositions; and various RAD transfers of assistance.

A 30-day public comment period was conducted from May 25 – June 26, 2017. CHA held two public comment hearings during the 30-day public comment period, on June 1, 2017 and June 5 2017. Announcements for the public comment process appeared on CHA's website and in the Chicago Defender on May 31<sup>st</sup>; Chicago Sun Times on May 25<sup>th</sup>, 26<sup>th</sup>, 29<sup>th</sup>, 30<sup>th</sup> and 31<sup>st</sup>; and Hoy newspapers on May 26<sup>th</sup>, 29<sup>th</sup>, 31<sup>st</sup> and June 2<sup>nd</sup>. CHA also distributed resident notices across public housing properties and sent an email notification to HCV residents.

During the public comment period, residents and the general public were able to submit comments orally and in writing regarding the proposed FY2017 MTW Annual Plan Amendment. Prior to finalizing the proposed FY2017 MTW Annual Plan Amendment, CHA gave consideration to comments received during the public comment period.

CHA has complied with the requirements of the Amended and Restated MTW Agreement and HUD regulations regarding annual plans and amendments.

Respectfully Submitted:

Jennifer Hoyle

Director, Strategic Management and Partnerships

**RESOLUTION NO. 2017-CHA-75**

**WHEREAS,** The Board of Commissioners has reviewed the Board Letter dated July 18, 2017 requesting approval of the Proposed FY2017 MTW Annual Plan Amendment and authorization to submit the Proposed FY2017 MTW Annual Plan Amendment attached hereto;


**THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE CHICAGO HOUSING AUTHORITY:**

**THAT,** The Board of Commissioners hereby approves the Proposed FY2017 Moving to Work Annual Plan Amendment and grants authorization to the Chief Executive Officer, the Board Chairperson, or their designee to make any final updates as deemed necessary;

**THAT,** This approval of the Proposed FY2017 MTW Annual Plan Amendment supersedes any and all conflicting language found in prior CHA MTW Annual Plans;

**THAT,** The Board of Commissioners grants authorization to submit the Proposed FY2017 MTW Annual Plan Amendment to the U.S. Department of Housing and Urban Development upon Board approval. Such approval shall constitute conclusive evidence of the Board's approval of any and all such changes.



  
Eugene E. Jones, Jr.  
Chief Executive Officer  
Chicago Housing Authority

*Annual MTW Plan Certifications of Compliance*

OMB Control Number: 2577-0216  
Expiration Date: 5/31/2016

Form 50900: Elements for the Annual MTW Plan and Annual MTW Report	
Attachment B	
<b>Certifications of Compliance</b>	
Annual Moving to Work Plan Certifications of Compliance	U.S. Department of Housing and Urban Development Office of Public and Indian Housing
<b>Certifications of Compliance with Regulations: Board Resolution to Accompany the Annual Moving to Work Plan*</b>	
<p>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 Annual Moving to Work Plan for the PHA fiscal year beginning <u>FY2017</u>, 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:</p> <ol style="list-style-type: none"> <li>1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA conducted a public hearing to discuss the Plan and invited public comment.</li> <li>2. The PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.</li> <li>3. The PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1.</li> <li>4. The PHA 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.</li> <li>5. 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.</li> <li>6. 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.</li> <li>7. The PHA will affirmatively further fair housing by examining its 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.</li> <li>8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.</li> <li>9. 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.</li> <li>10. 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.</li> <li>11. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.</li> <li>12. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.</li> </ol>	

Attachment B

1

OMB Control Number: 2577-0216  
Expiration Date: 5/31/2016

13. 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.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105( a).
15. The PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
16. 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.
17. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
19. 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) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
20. 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 Moving to Work Agreement and Statement of Authorizations and Included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the 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 Plan and will continue to be made available at least at the primary business office of the PHA.

PHA Name

PHA Number/HA Code

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

CHA Board Chair  
Name of Authorized Official

John Hooker  
Title

John J. Hooker  
Signature

10.6.16  
Date

\*Must be signed by either the Chairman or Secretary of the Board of the PHA's legislative body. This certification cannot be signed by an employee unless authorized by the PHA Board to do so. If this document is not signed by the Chairman or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.

***Public Comment Info and Grid***

Prior to submission of the Proposed FY2017 MTW Annual Plan for CHA Board approval, a 30-day public comment period was conducted from August 1 through August 31, 2016. CHA held three public hearings during the comment period, on August 10 (Charles Hayes Family Investment Center, 4859 S. Wabash), on August 11 (CHA Corporate Offices, 60 E. Van Buren) and August 18 (Patrick Sullivan Apartments). A total of 24 people participated in these hearings. The following table includes public comments and CHA responses.

Comment #	Individual/ Organization	Comment	CHA Response
1	Francine Washington	<p>In 1999 we started going through the plan – in 1998 we started going through the plan for transformation with Bridget Reedy and Valerie Piper. At that time with the 1998 plan for transformation, we supposed to have the right to return, but also in the plan it was signed January 6, 2000, it said that whenever we go back on the land, we would get one third, no matter what.</p> <p>My comment is, why is it not getting one third of what is being built on site? They are building 800 something units, it's like 200 units that is not in the original plan. Ickes, 22nd and State and 24th and State, Dearborn and Federal. Why are they only getting 200 units back instead of a third of what's going back on the land? But still, if you do a third, that is still like 50 short.</p> <p>How many are they building? They just changed the plan. So when will we be let in on that? Because being a resident, we have been sitting on the work – we want to be in about that because we are very dissatisfied.</p> <p>Thank you all for mailing everything out. Some of these residents that are mixed income, they got a mailer. If you can mail it out for them, you can mail it out for us</p>	<p>There will be 244 CHA Units of the proposed 877 units at the former Harold Ickes Redevelopment Site. The unit mix is 53% Market Rate; 19% Affordable; 28% CHA. CHA will host a resident only town hall in mid-September to receive resident input on the overall redevelopment plan for the former Harold Ickes site.</p>
2	Chris Curtis	<p>The 250 units that Francine said, that is actually, that is people that come back to Ickes? Why does the number keep changing?</p> <p>Well, it's not posed to her. It's not because of her I'm asking that question. It was supposed to be-- it's -- if you go back in 2008, 2009 and check the computer and people that left Ickes and people with the right to return, it's not contested. It's about check your list, how many people left and right to return to come back. It is not contested.</p>	<p>Forty-five 10/1/99 Ickes residents are awaiting their Right of Return, and of those 45 individuals, fewer than half (20) selected Ickes as their first choice.</p>

Comment #	Individual/ Organization	Comment	CHA Response
3	Mary E Pattillo	The 2017 Proposed Moving to Work Plan discusses the replacement units for the Lathrop Homes. The CHA has promised 525 replacement units off site, but has never given concrete information about when or where. This plan lists 111 replacement units at Crowder Place, Mulvey Place, and Devon Place and 60 units at 6418 N. Sheridan. But these buildings already exist and are occupied and are currently senior buildings. How does this constitute replacement units for the 525 that will be lost at Lathrop? As a result, this still represents a net loss in family public housing opportunities in Chicago and no net gain in affordable housing opportunities overall, since this was already affordable housing, just under different management. This is outrageous.	The proposed property at 6418 N. Sheridan is planned to provide new construction, family units. CHA is continuing to work with developers, Alderman and other partners to provide additional units. CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city.
4	Michael Stanek	Shame on CHA for proposing to fulfill its promise to replace 525 units to be eliminated at Julia C. Lathrop Homes, in part with 111 units that are already mostly-occupied, already affordable, and mostly reserved for seniors. The CHA's attempt to foist such a deception is insulting to the intelligence of the public. The CHA is a public agency - ours - and we want, need, and expect it to act honestly and openly. As the promissory letter of Feb 17, 2016 states, "CHA is committed to producing 525 new housing opportunities", the operative word being "new", and therefore not previously available. Further, we're not prepared to accept toward the 525, currently affordable units that the CHA might save from falling into the market.	The proposed property at 6418 N. Sheridan is planned to provide new construction, family units. CHA is continuing to work with developers, Alderman and other partners to provide additional units. CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city.
5	Myra King	<p>My name is Myra King. I'm the LAC president of the development Trumbull Park in Logan Homes. When did we get this? I got it yesterday. I was trying to read it as you guys were talking. When did we get it?</p> <p>This is what I want to say, and I'm trying not to be personable, but the way things are done, I feel like CHA has an open door to do whatever they want almost whenever they want. You do what HUD requires and you do the comment period but they're so close together, we don't get them in time enough to read them and really digest to understand and be able to really get our comments down. Because what I got yesterday from tenant services was like this. I just saw this today.</p> <p>How come we are not briefed on these things before the comment period takes place?</p> <p>If we could be -- sometimes all that reading, a lot of people</p>	CHA is committed to providing all stakeholders with the opportunity to comment on the Annual Plan, and any other document released for public comment. Moving forward, CHA will work to brief resident leadership on new and continuing activities outlined in the agency's MTW Annual Plans.

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		<p>won't be doing all that reading, but if it can be broken down to something like this in bits and pieces, maybe for a lot of us it's easier to manage. So things are put in a way and they're written in such a way that okay, you have done what you're supposed to do, you put it out. HUD says that you have to do it. We -- you did what HUD says you have to do. The way you write it though, is like today, it's going to some of these things say future planning, but it does not say you're going to come back to us about anything. It's so open and it's so vague, and it's like you just leave it open so that you can throw whatever needs to be thrown in as you see it at a later date and time, then we have nothing to say about it.</p> <p>Because number one, the comment period is gone. Number two, only six people attended. Number three, nobody seems to care anyway. You can't care when you don't understand what's going on or what's being spoken.</p> <p>Can you mail them to us in a timely fashion versus depending on us getting them online? A lot of times that website you guys have is chaotic. If we could get it mailed to us.</p> <p>You're giving billions of dollars to everybody else. Can you spend some money on mailing it to everybody?</p>	
6	Jackie Paige	<p>Hi, I already said a little bit to Jenny. I'm going to say this. For the record, like Myra was saying, we need more transparency and Eugene, you yourself have said that you're for transparency. The HCV now has arrived. We didn't know that. We just had a meeting on Monday.</p> <p>Another thing, see about transparency, you're speaking about supportive services. We don't even know about the current supportive services, let alone the ones that are proposed. Like for instance, the reason why this is important is, that young man who was shot in the back, he was HCV, and it's nice that the mayor -- Yes, his names was Travon Tanner. It's nice that the mayor was there for him, but HCV, that should be some services for the HCV residents that help and that could have relocated. The mayor should not have had to step in. HCV should have been there to cocoon that family and make sure that the family got what they needed. Also because that family was in the news, it got focused on. There are lots of families that are not in the news that do not get focused on.</p> <p>And then -- the way that I say that you can address that, whenever a family is -- an incident like this hits the police station, HCV actually sends out an intent to terminate letter. Because I forget the name, but we discussed that a few years</p>	<p>CHA's website has a detailed listing of all social service opportunities, and that listing can be found here: <a href="http://www.thecha.org/residents/services/">http://www.thecha.org/residents/services/</a></p>

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		ago, a few HCV residents received an intent to terminate letter because their family was mentioned, their unit was mentioned in the police report. The same way you use those police reports to harm a resident, use those police reports to send supportive services. That's one way that you could help the residents when you speak about these supportive services.	
7	Jackie Paige	And another thing I want to talk about. I'm switching to the Robert Taylor. I'm an ex Robert Taylor resident. Who's speaking for Robert Taylor? Robert Taylor is torn down. I think that the Robert Taylor residents should have some input above and beyond the old presidents. The old presidents don't necessarily speak because Robert Taylor – what I'm trying to say is, how do you choose who speaks for the Robert Taylor land above and beyond the presidents? Because the presidents are no longer in play. They have their – many of them have HCV vouchers. So who speaks for the Robert Taylor? And as a ex Robert Taylor resident, I would like to sit at the table because that land, my mother was the president of our building and that land has some value to me. So I would like for there to be some transparency. Because somebody has to sign off on it. Who is signing off on this development? You're talking about developing Robert Taylor. Who's signing off?	Disposition of vacant Robert Taylor land has to go through HUD's Special Application Center's (SAC) approval process that requires that the elected resident leadership be advised; Robert Taylor no longer has a Local Advisory Council but instead is represented on the Legends South working group by the "Legacy" resident leadership. In addition, if no local resident organization exists then the agency wide resident organization, in this case the Central Advisory Council (CAC) has to be advised. Also there are different public forums afforded the residents and any other concerned individuals to voice their opinions including the public hearing process of CHA's Annual Plan and the corresponding CHA Board meeting for the approval of the disposition action. CHA has complied with HUD regulations and has received approval from HUD as well as from CHA Board prior to disposing on any vacant CHA land including former Robert Taylor land.

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8	Jackie Paige	<p>Then the PRA, you're talking about the term -- eight-year term limit demonstration program. What is that? What demonstration program? When Myra was talking about being briefed, those are the kinds of things we want to be briefed on. What does this program entail? What is -- what happens to the -- this is a demonstration program. After the -- is this toward sustainability? And then after the eight years, what happens to the family? Those are the kinds of things that we want to know.</p>	<p>Thank you for your comment, CHA would like to clarify a couple of points. a) The time line of 8 years was based on the average number of years that a household participates in the HCV program. b) The selection process for the 100 families would be from the lower 50% of the wait list as an incentive to participate. Families would opt in, not be cherry picked nor have a requirement to participate. c) The 100 families would be from 2 distinct groups: 50 families who are at 51-80% of the AMI who would be enrolled in FamilyWorks program, and the second 50% who are at 0-50% of AMI and enrolled in the FSS program. d) No one will be removed from voucher assistance at the end of the demonstration, rather people will either be able to transition off or they will remain to receive a frozen HAP amount based on the amount received at the end of the program. e) The purpose of the demonstration is to see if level of AMI at entrance makes a difference in how long assistance is needed, when supports are provided. CHA will also look at similarly situated households who would not be receiving services, but who are from the same income categories for comparison.</p>

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9	Tamiko Holt	<p>I don't think the CHA is ready to implement the eight-year demonstration program for the HCV voucher program for, what's that, 100 families? As a matter of fact, I don't think the country is ready. My concern is, people are going to be cherry picked from wait lists, and it's going to be people that's at an advantage, education that probably fell on hard times, for at this moment in their lives that need low income housing that probably have degrees and things of that nature, and that's not – that wouldn't be the total, what do you call it, the demographics of the majority that need low income housing so that would give a false positive. Does that make sense?</p> <p>So but you're not dealing with your current tenant demographics that you have a high illiteracy rate that nobody wants to talk about what's going on now. I see a lot of college, college, college being pushed but you don't have enough vocational programs and things of that nature to help people to be high earners because everybody is not college bound. So with all that being said I could see where that's going down the line, the powers that be that's trying to push toward this elimination process, and you will have a lot of people homeless down the line, and that's scary.</p> <p>So no, and not to take away from your tenure because you just got here. You're doing a great job, but your, what you call it, resident service department is not ready, nowhere near ready. So yeah, that's scary alone, not ready for a demonstration program, and this PHA is supposed to be the best in the country. So if you're not ready, the other ones around the country is not ready. So that's what I have to say on that matter.</p>	<p>Thank you for your comment, CHA would like to clarify a couple of points.</p> <p>a) The time line of 8 years was based on the average number of years that a household participates in the HCV program.</p> <p>b) The selection process for the 100 families would be from the lower 50% of the wait list as an incentive to participate. Families would opt in, not be cherry picked nor have a requirement to participate.</p> <p>c) The 100 families would be from 2 distinct groups: 50 families who are at 51-80% of the AMI who would be enrolled in FamilyWorks program, and the second 50% who are at 0-50% of AMI and enrolled in the FSS program.</p> <p>d) No one will be removed from voucher assistance at the end of the demonstration, rather people will either be able to transition off or they will remain to receive a frozen HAP amount based on the amount received at the end of the program.</p> <p>e) The purpose of the demonstration is to see if level of AMI at entrance makes a difference in how long assistance is needed, when supports are provided. CHA will also look at similarly situated households who would not be receiving services, but who are from the same income categories for comparison.</p>
10	Patrick Barburris	<p>My comment was based on what was -- what Ms. King said. Is there a way where prior to the publication, prior to the decision that there's going to be a meeting, prior to notice, prior to any announcements, where the interested parties can attend those meetings on the non-participatory level just so that they can hear the information but when those -- when these get published they know what to expect? Is there a strategy session that can be set up where CHA can then sit down with the interested parties, say this is what we are planning on doing. We're going to be putting this out next month, not a day or two before the meeting, but literally one month prior, two months prior so that they can really say, well, here is our feedback and can it really be used?</p>	<p>CHA is committed to providing all stakeholders with the opportunity to comment on the Annual Plan, and any other document released for public comment. Moving forward, CHA will work to brief resident leadership on new and continuing activities outlined in the agency's MTW Annual Plans.</p>

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11	Tamiko Holt	<p>I want to talk about these incentives. Now, for this – for the PRA programs, isn't it incentive enough that you know that pretty much you're getting – you know that your building is going to be occupied when you're doing these deals with the people that's pretty much coming to you about your tenant base? You got to give them money too. I think that's a bit much.</p> <p>Yes, you're already going in deals with them, hey, we're going to give you our tenant base, you're letting us have a certain amount of units we will automatically lease for how many years. You working in these – but you also are giving them money to know – what is that about? I don't understand. I need to – that's why when I put in certain applications to be part of certain things, I ask for more clarity so I wouldn't have these type of questions when you're doing certain things. That's pretty much, you are giving them a golden goose like hey, you have an automatic tenant base that you don't have to worry about tenants or empty units, but then you're giving them more money? Like oh no. So they don't want to be bothered with us if that didn't come along with it, then you're giving them money on top of it. So you're giving them human capital and then giving them money. No, that is a bit much.</p>	Under the PRA program, CHA may provide vacancy payments to owners of new construction and substantially rehabilitated properties during initial occupancy/leasing for a total of up to two months similar to HUD's standard vacancy payments available when an assisted family moves out. This initial occupancy/leasing payment helps ensure lease up to families on CHA waitlists.
12	Tamiko Holt	I see ABLA and Roosevelt Square, it's all the same to me, very much so and you have heard me say this in the past. Mr. Jones, you know our people are going through a lot of over there. You know I stay over there, HCV and ABLA resident, I stay all in the business. You know I'll move the crowd. Thank you.	Your comment has been received.
13	Myra King	<p>Those that have the right to return and those that are still out there because nothing has been built. How can we – a lot of this that you're doing, you're saying, for example, there are proposed plans for Ickes and places such as that. Are we talking to the residents that have the right to return to say this is what we are proposing? Are you gathering them together so that they can know what's going on versus they don't know what's going on. A lot of times when something does open and they – those that have the right to return, resident services is supposed to – and not resident services, the family work agencies are supposed to reach out to them the year prior to them returning. That, as you know, does not happen. Commissioner Washington talks about that all the time. So they aren't being given due justice, and then once they miss their opportunities you go straight to the wait list.</p> <p>What can we do that allows those of us that have the right to return to be, what's the word, so that we don't keep getting up here standing having to talk for them. A lot of times just like I</p>	CHA has been in contact with remaining former residents of Ickes who have a Right to Return. They have been invited to participate on the working group; however all have declined. CHA makes regular contact with residents, to check their information. Those who live in CHA who have the Right to Return are contacted by their FamilyWorks provider and offered services. Those who may have the opportunity to reinstate their Right of Return can do so. We have recently held meetings for LeClaire residents and we will continue to involve the CAC and HCV participant council.

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		<p>got this yesterday, they're not getting anything. So we can't lose sight of that population. We have got to speak for them. Are you guys doing -- having surveys sent to their house to -- for example, to say are you still interested or this is what we are planning on doing. If we were to hold a meeting to talk about future plans for your site, would you be a participant in that?</p> <p>But they're not being given that opportunity. You continue to say in these plans that planning will be continued for those sites, LeClaire, Ickes, and places such as that, but are you talking to the people that have the right to return?</p> <p>As long as you can prove that it's being done.</p>	
14	Ms. Weston	<p>I have a comment regarding this matter here. I'm point forward. Are we being ripped off? We are the ones that's in there and we need our houses, our seniors. We have seen this change already over there in the lake, they tearing down developments, promising families they're going to rebuild and come back. They have not. They go to the waiting list. You understand what we are saying here. Now, it seems like ain't nothing for the old because you're going for the new but what do we have here? Now, I want a box of this. Can I have so much copies of this because if I have to go walking around to my residents, LAC and let them know, because I'm hearing some of us do not have computers. Some of us may just have a device phone. Some can't print this out, okay, but this is something serious right here. You're talking about taking money, building something else, something we have seen, already happened now. And we see a lot of families that were promised homes are still on the streets, okay. Children on the street, families fighting in shelters, and all this and that. Okay, you are giving good details because yes, I was a CHA housing, still is. I graduated with the programs. I did all that, now you don't have certain family workers do what they want to do. We don't want to sound like we are not welcoming nobody, but you have to understand we scared because you're like ghosts. You boo, too fast, and people on the street homeless, hungry, and everything and we don't even know. This is something new to me. I have to go run and tell everybody, yo, we better be somewhere planning something around here because hey, I'm scattered site. My back is broke. I'm over there fighting your managers. I'm done deteriorating because I became a CHA housing authority scattered site. When I was in the project, I learned how to go to school. You gave me the babysitters, everything. All of us not illiterate. Now remember this, okay, but why is ya'll sending these folks on us, these family workers and these management? Now I'm sitting up hearing somebody going to steal what, and some more babies out there? Now</p>	Your comment has been received.

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		you have to understand, this is all regarding government. We are trying to get along trying to make it, you understand? We already going. Babies getting killed. We done been through that already. You should have seen how them babies in Cabrini Green dying and burning up in Lathrop Homes from management. Now ya'll killing us, now you're going to throw us in the street. Like you say human what? I want a bucket of these so I have to get them out here and pass them all around.	
15	Melvin Muhammad	I have a question. I'm new to the whole process. I'm looking at the Cabrini Green Row House project, and I – when can I access the future plans for that? Because I have been skimming through this. I'm constantly on my computer. I didn't see any notification about this meeting or anything. I read the newsletters and everything, but in particular I'm asking about this here because I'm reading the paragraph "from all those that are involved," and I had some dealings with – my concern is, when we do redevelop in different places, I have had the opportunity to go out to the housing project authority because they did not enforce some of the things that they supposed to do when they are redeveloping for the public housing. And I'm just – this one here because I know how they have built up in that area. So I'm very concerned to see or know what they have planned for so that I, in particular and others can pay attention to help enforce. Because that's what I – we will do. Ain't nothing but a phone call or even write somebody to implement these things. Where can I find this future plan?	At this time, CHA does not have redevelopment plans for the Cabrini Rowhouses. CHA intends to issue an RFQ for the Rowhouses in Q2 2017. The Working Group, which includes CHA residents from this site, will play an important role in the redevelopment of the Rowhomes, including in the creation of the RFQ, in order to ensure resident's needs are fully represented.

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16	Welch, Jennifer	<p>The Department of Family and Support Services (DFSS) writes in support for the CHA's Proposed Moving to Work 2017 Annual Plan. DFSS provides direct assistance and administers resources to more than 300,000 Chicagoans each year through a citywide network of more than 350 community-based delegate agencies. We are charged with serving Chicago's most vulnerable populations, including domestic violence survivors, ex-offenders, seniors, at risk children and youth, plus those who are homeless or at risk of homelessness. We work closely with CHA to house and serve Chicago's homeless population.</p> <p>CHA's most recent Moving to Work plan contains various elements to support Chicagoans who are homeless or at risk of homelessness, including:</p> <ol style="list-style-type: none"> <li>1. Redevelopment of Fannie Emmanuel Senior Apartments, providing 181 units for low income seniors.</li> <li>2. Continued support for the Ending Veteran Homelessness Initiative with Veterans Affairs Supportive Housing (VASH) units for formerly homeless vets.</li> <li>3. Continued support for the Sponsor-Based Voucher Program, providing a rental subsidy plus support services and the possibility of security deposits available for formerly homeless residents, including residents from the Chronic Homeless Pilot (CHP).</li> <li>4. Continuation of the Re-entry Pilot Program which seeks homes for up to 50 people reuniting with a family member in CHA housing.</li> </ol> <p>DFSS is fortunate to partner with the CHA to support Chicago's most vulnerable residents, and we support the 2017 MTW plan.</p>	Thank you for your comment.
17	Robert Whitfield	<p>Good afternoon. The following are some initial comments on the Draft 2017 CHA Annual Moving to Work (MTW) Plan. I previously commented that the Draft CHA MTW Annual Plan did not have a single reference to planned development at the site of LeClaire Courts, even though that site has been vacant for several years. I note that the Draft 2017 CHA MTW Plan also makes no reference to current and or proposed development at the LeClaire site. CHA should modify the Draft 2017 MTW Plan to include some reference to planned development activity at the LeClaire site. CHA is reminded that the CHA Relocation Rights Contract (RRC), provides all CHA public housing residents residing in a CHA public housing unit as of 10/1/99, with a legally enforceable right to return to a new or rehabilitated public housing unit, without regard to whether CHA subsequently satisfies its commitment to HUD to produce 25,000 low income units.</p>	CHA is reviewing the plans. Proposed revisions will be presented to the Working Group before any decisions are made.

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18	Robert Whitfield	CHA should also consider modifying its development plans for Lathrop Homes and the Cabrini Row Houses to explore ways to maximize the preservation of more of those units; considering these sites will be the only CHA family developments on the north side. Further, the Draft CHA 2017 MTW Plan does not contain a single reference to the repeated CHA promises to provide more off site Cabrini and Lathrop replacement units on the north side. At the very least, the CHA Plan should include language, if not specific proposals, to provide more replacement public housing on the north side. CHA is reminded that this was also promised in language included in the recent agreement to amend the Horner Consent Decree to lessen the number of Horner "Super Block" public housing units. The CHA Draft MTW Plan also has no reference to the promise to explore placing some of the "Super Block" replacement units on the north side. The draft plan should be modified to include specific language that sets forth CHA's commitment to provide more Horner, Cabrini and Lathrop replacement public housing on the North side.	Thank you for your comment.
19	Kate Kreinbring Board President, Northcenter Neighborhood Association	<p>The Board of the Northcenter Neighborhood Association asks that CHA keep its promise to replace the units demolished in the redevelopment of Lathrop Homes. We have polled our membership to ask if they support the proposal that such replacement units be within 2 miles of the Lathrop Homes to preserve affordable housing in north side communities for low income families and address segregation. The response to our survey was that 95% would like CHA to replace demolished units and to do so in our communities. Our organization represents a section of the North Center community area.</p> <p>North Center has been experiencing a rising median income in the past decade. As a result, affordable apartment units have been demolished and replaced by larger single-family homes. Families who have been long-time residents have had to relocate; and those hoping to benefit from our outstanding schools and parks are increasingly unable to find reasonably priced units. As a result, North Center becomes less diverse and our city remains highly segregated. The CHA has been slow to respond to the demand for mixed income developments in our community and similar neighborhoods known as Opportunity Areas.</p>	CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city. CHA is continuing to work with developers, Alderman and other partners to provide additional units.

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20	Francine Washington	<p>1) First of all, I don't see nothing on here about LeClaire at all.</p> <p>2) I was wondering what do we mean by which are the people you're going to take off and put on the Section 8 vouchers for eight years? What are we talking about? I don't understand it.</p> <p>3) I need to know where it says on Page 4, where it says public housing self sufficiency program, understand that – I don't understand the self sufficiency policy participation. 4) I don't understand the Housing Choice Voucher Program where you calculate the eligibility and when they have to do that every year or every three years. Also, are you trying to put everybody on the three-year plan? Does Section 8 have to be calculated every year or every three years? And also, the demonstration program, 100 families, I want to know about the re-examination. Some are doing it, some are not. 5) Doing the fixed income, you come in and do your continuing occupancy, your redetermination, then you will have to resubmit all your paperwork, and they make them to submit the paperwork, make them go to the banks, which is a problem. Or some management companies are still sending it to the banks to know how much the person's income is, and if they have a bank and the bank is charging people, you still have \$15,25,</p>	<p>1) CHA is reviewing existing plans. Proposed revisions will be presented to the Working Group before any decisions are made. 2) Thank you for your comment, CHA would like to clarify a couple of points. a) The time line of 8 years was based on the average number of years that a household participates in the HCV program. b) The selection process for the 100 families would be from the lower 50% of the wait list as an incentive to participate. Families would opt in, not be cherry picked nor have a requirement to participate. c) The 100 families would be from 2 distinct groups: 50 families who are at 51-80% of the AMI who would be enrolled in FamilyWorks program, and the second 50% who are at 0-50% of AMI and enrolled in the FSS program. d) No one will be removed from voucher assistance at the end of the</p>

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		<p>\$35 coming out of people's bank accounts. Every time you go into somebody's bank account, they give you a printout and you have to pay for that. Property management needs to understand they can't do that, and they are telling the residents you have five days to go and get a statement. They have to wait to get a Medicaid card. So that's become a hardship on the residents and a lot of these, not just families but senior housing, a lot of them is not calculating rent right. Everything is -- where the recertification clerks is calculating the rent wrong. That's a major problem every day.</p>	<p>demonstration, rather people will either be able to transition off or they will remain to receive a frozen HAP amount based on the amount received at the end of the program. e) The purpose of the demonstration is to see if level of AMI at entrance makes a difference in how long assistance is needed, when supports are provided. CHA will also look at similarly situated households who would not be receiving services, but who are from the same income categories for comparison.3) In regard to the family self-sufficiency program, CHA is requesting authorization for an exemption from the requirement that FSS enrollments must take place within 120 days of an annual or interim recertification of income process. If granted, this exemption would positively impact future FSS participants by decreasing the wait time from orientation to the enrollment appointment. Instead of a wait time of 30 – 90 days for the recertification, the household can enroll in FSS after attending an orientation session. 4) All HCV Participants are now on biennial recertifications, meaning that they recertify every two years. This activity was implement in 2015. Households in which all family members are elderly and/or disabled and which are on a fixed income will recertify every three years. Few exceptions apply to the above two situations, such as those participants who report zero income. 5) CHA is moving toward biennial and triennial recertification schedules. With the exception of households engaged in special programs such as Family Self Sufficiency (FSS) and Earned Income Disallowance (EID), we anticipate that the majority of CHA households will only be required to recertify every two or three years by the close of 2017. Reducing the frequency of recertifications will mitigate the hardship on CHA residents. Residents are typically notified of upcoming</p>

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			<p>recertifications 120 days in advance to allow ample time to gather and process the required documents. At the time of recertification, residents are allowed to submit bank statements, which are typically provided monthly by banking institutions at no cost to their clients. We are unaware of any additional fees associated with a resident or an applicant acquiring their own bank statements. CHA continually trains its staff and agents on rent calculation, admissions and continued occupancy policy, and the recertification process. Residents are encouraged to contact CHA if there are concerns regarding the accuracy of their rent calculations.</p>

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21	Francine Washington	<p>Also, we need to when – the redetermination, family composition change. And we're talking about the work requirements, CHA wrote the FamilyWorks contract. As a matter of fact – anyway, they wrote the Family Works contract. They took the opportunity to engaging out, and you can't tell a resident – if I'm not doing what I'm supposed to do, I get a referral from management to go to the Family Works. If I'm not meeting the work requirement, they send the referral to the FamilyWorks. Then after mediation, FamilyWorks. Since we both worked on the Family Works contract, we need to make it mandatory that the people participate. You can't wait until the eleventh hour and tell me it's mandatory once you send the referral on me.</p> <p>We wrote that contract. They took the engagement out. If I – Family Works – no residents have to go into the Family Works office. They still going to get paid because it's not mandatory. Then we do outreach. I'll give a good example, and I have to give a good one. We had trips, this is – they had trip for the kids to go to the zoo, 400 kids, Brookfield Zoo. I don't think – what they do is, they pay you do to a job, there was less than 200 kids that showed up, okay? They continue to give it to the LAC or they give it to the Family Works and say LAC, confer with the FamilyWorks. When you put it in Family Works, you give it to them, let them do it. That's what we are beginning to say.</p> <p>When you put stuff in our hands, the president's hand, they have to hustle they will come up with their numbers. We don't have to hustle because – you give it to us to say we'll get with FamilyWorks and give it to LAC, therefore, if you notice, FamilyWorks been trying to get kids and what have you. They have been short.</p> <p>Everything is being given to them first. Outreach and engagement that shows you what happened today. Last 40 minutes they have not got the heat for the summer. I put on job fairs in my areas, recruiting kids. All my areas can work. We are still short some kids, because it was up to FamilyWorks to get the kids. Why should we hustle and not get paid to do this, when they getting paid to do that and at the eleventh hour they are calling us to help them out.</p>	<p>Engagement is being added back in to the contract for 2017.</p> <p>In the 2016 MTW Plan Amendment, waiting for HUD approval, CHA proposed mandatory services for households not meeting the work requirement.</p> <p>The Brookfield Zoo event was not a FamilyWorks event, it was CHA's. We appreciate all efforts for outreach. CHA will make a better effort to engage LAC upfront.</p>
22	Francine Washington	<p>I don't understand the 90-day inspection, HCV Program, I don't understand that. HCV papers, I really don't understand what that means. To make a modest vacancy payment, if I have a choice unit and they have the land vacant for three or four months, we are going to pay the landlord while it's vacant? Is that what that mean? I'm on Page 6 of 8. HCV, second to the third, HCV Program. The third one, do that mean that if I got</p>	<p>This activity was approved in 2011 but placed on hold by the CHA in 2016. In 2017, CHA will reinstate this activity. Under this activity, CHA will accept a passed inspection as an initial inspection if: (1) that inspection was conducted within the past 90 days, and (2) that unit</p>

Comment #	Individual/ Organization	Comment	CHA Response
		<p>the choice of resident units and it's vacant for three or four months, I'm going to pay anyway? Is that what this means? If I show up 90 days prior, it should not be -- if I show up -- as soon as I pass or I should be moving in. Nobody should be moving in 90 days later. It means you're paying a lot more than three months and nobody else is getting that. Why would you put that in there? Think about it. If you do my rent calculation, I'm supposed to move in within the next 30 days, if I don't move in for 90 days what is going to be my rent for three months although I'm not living there. If I wait three months to move, then I don't need to move. I need to stay where I'm at. I don't need to move into Section 8. We have had a lot of residents decide not to take the unit, meanwhile people are in there vandalizing, putting graffiti on the walls and everything. You know, vacant land -- people have destroyed it if they can't use it or they get people to house sit. So it won't work. It won't work.</p>	<p>is part of the Inspection Excellence Program. In order words, a new tenant need not wait for a particular unit to pass inspection once a RTA is submitted if that unit has a history of passed inspections and passed an inspection within the past 90 days. This activity reduces wait time for participants seeking to rent exceptional units and decreases inspection costs for the CHA.</p>
23	Claudine Ware	<p>In regards to the excellence and acceptance, pass annual or initial inspection, what does that 90 day mean?</p> <p>The excellence program has been in existence for quite a while but it's not like this, so can you please explain?</p> <p>The way you said it makes sense somewhat because that individual already had a tenant that was going to utilize that unit, but -- and they already went through the inspection and passed, but now they backed out for whatever reason and found another unit. So another person comes along and sees the same unit. As long as it's within that 90 days, it does not have to go through the inspection.</p> <p>What about that owner excellence owner, the landlord, doesn't get anybody for six months? Does CHA comes and pick it up for six months? When you're saying modest, it may not mean the same as yours. Let's clarify. It probably is, but you need to be specific because people think that six months might be modest to them versus what you're thinking.</p>	<p>This activity was approved in 2011 but placed on hold by the CHA in 2016. In 2017, the CHA will reinstate this activity. Under this activity, the CHA will accept a passed inspection as an initial inspection if: (1) that inspection was conducted within the past 90 days, and (2) that unit is part of the Inspection Excellence Program. In order words, a new tenant need not wait for a particular unit to pass inspection once an RTA is submitted if that unit has a history of passed inspections and passed an inspection within the past 90 days. This activity reduces wait time for participants seeking to rent exceptional units and decreases inspection costs for the CHA.</p> <p>This activity only applies if the unit passed an inspection within the past 90 days. This would not apply to a initial inspection that must be conducted 6 months later should a new tenant seek to rent that unit.</p>

Comment #	Individual/ Organization	Comment	CHA Response
24	Francine Washington	What about modest payment for taking care of the -- I can pay a resident and I they're a month behind their rent? Why would we pay them if their rent is on time? That's why they're on Section 8	Owners with units in the Inspection Excellence Program (IEP) may receive vacancy payments if that unit qualifies for tier 2 benefits according to CHA's IEP policy. To receive these payments, the unit must have been vacated by an HCV resident and a new HCV resident must have moved in within 60 days. CHA will pay up to 2 months of vacancy payments according to how long the unit is vacant (but cannot be longer than 60 days).
26	Claudice Ware	I'm a resident. My first question looking at Page 2, acquisition units that are being purchased, my first question is, where are they going to be located? Is it going to be south, east, north, west, what? And who will -- who will receive the benefit of occupying these units? Are they being pulled from the wait list again or are they going to look at these families that -- you have ten, one bedrooms and we are in need of bedrooms, one bedrooms, to move people around to downsize on the right size. We will -- will they benefit as well?	CHA seeks to acquire units in general and opportunity throughout the city. Residents for these new housing opportunities will be selected from CHA waitlists.
27	Claudice Ware	<p>Page 6, going back to the Housing Choice Voucher Program. Number one, the way I'm understanding this is, it's reading as though going forward in the future, you're not going to exceed the 150 percent which to me tends to knock people out of opportunity areas because you have rent --landlords who are asking for more than 150 percent for residents to be able to move into those units. So how does this benefit us?</p> <p>Recently we had a resident who really needed that unit. They were going to be homeless because her first unit went into foreclosure. The landlord was asking for more than 150 percent. If we begin to move them down, it locks us out, and it was an opportunity area. So it locks us out of opportunity areas and that's not fair to us. We want better schools for our kids. We want good living conditions. That's all I'm saying, even with Hyde Park.</p> <p>Are we inviting those landlords into the excellence program so they have some form of incentive to come down?</p>	CHA will provide exception payment standards to families who seek to rent in opportunity areas. These exception payment standards can be made up to 150% of CHA's current payment standard. This policy, while not allowing access to the most expensive rental properties in the city, greatly increases the rental opportunities for HCV voucher holders. The CHA balances the need to offer affordable housing choices with its fiscal responsibility to further its goal of helping low income individuals and families find housing that meets their needs.

Comment #	Individual/ Organization	Comment	CHA Response
28	Claudice Ware	My other question, I see you all talking about on the same Page 6, that Rental Assistance Demonstration Program, about the earned income disallowance for those project based and RAD. Are we eventually at some point going to offer income disallowance to HCV residents?	The earned income disallowance (EID) encourages people with disabilities to enter the work force by not including the full value of increases in earned income for a period of time. EID applies only to families already participating in the HCV Program, and to qualify the individual must be a person with a disability who was previously unemployed for one or more years prior to employment.
29	Claudice Ware	My other question which you have up there is that, no, we haven't yet over the past few years or whatever, have not heard anything about LeClaire. What are the plans for LeClaire Courts? Has the land been sold? What's going on? Are we talking about building on that land? Before you all came in, there was selling of land without knowledge and people lost out on property that should have been built up for public housing residents.	CHA is reviewing the plans. Proposed revisions will be presented to the Working Group before any decisions are made and the land has not been sold.
30	Ms. Baggett	<p>I have questions about Page 3 of 8 at the top. It says CHA plans to dispose of vacant land for future redevelopment for ABLA. I would like to know what plans are you planning on disposing? What land are you planning on disposing of? Whom are you planning on disposing it to, and what is planning on being built on our vacant land that's left over there in our community?</p> <p>I didn't know you had been talking about ABLA. I haven't heard anything about ABLA, any land being disposed of ABLA. I have not heard anything.</p> <p>We don't want ya'll selling nothing that belongs to the community. We should have a say so on what goes on in our development before you all start planning anything.</p>	The revised Master Plan for the ABLA site was finalized in December, 2015 based on consultation with the ABLA Working Group, residents, and community stakeholders. This plan includes development of proposed vacant land for civic and institutional uses, including community centers. The vacant land identified in the Proposed FY2017 MTW Annual Plan includes a site for a potential community center.

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31	Tamiko Holt	<p>I think that card is about the PRA, and you guys new construction and your payments that you give, the developers and owners? You already entered a deal with them with tenants, supplying them tenants for X amount of years. So my thing is, I want to know about these extra monies and incentives you're giving them. If you're already entering into a deal, and I'm pretty sure they're doing their numbers for the units they're giving us, so they're pretty much doing their numbers where in the years they pretty much going to give up these apartments for. They want to make sure that these deals are pretty much going to pay their mortgages out to where their bills will be paid for, right? So what other incentives is there needed to give them besides a building being pretty much paid for because they're housing subsidized tenants. So then you're going to give them another incentive on that? Pretty much a whole building should be enough incentive. You have to worry about it finding a tenant when you're already – you have tenants coming. You have to sit there and you have tenant coming because you entered into the agreement. What other incentives do you need? I'm curious. But let's go back because when you put out these advertisements, they seek you out because they know about you having this program. You're not seeking them out. They come knocking at your door, right? Correct me if I'm wrong, so they want this program. They want in. I'm trying to understand. So this means they want you, they want what you have to offer, which is your tenant base because they know that is automatic rent payments. They know that is already calculated out, if I do this for X amount of years, my mortgage is about to be paid up. I've about to own my building without having to worry.</p>	<p>Under the PRA program, CHA may provide vacancy payments to owners of new construction and substantially rehabilitated properties during initial occupancy/leasing for a total of up to two months similar to HUD's standard vacancy payments available when an assisted family moves out. This initial occupancy/leasing payment helps ensure lease up to families on CHA waitlists.</p>
32	Tamiko Holt	<p>The re-entry program is a good thing. I don't have nothing negative to say about it. It hasn't started, so I see that it says continuing activity. Being that it hasn't started, maybe CHA should think about upping the numbers? Why not consider upping the number to 50?</p>	<p>Thank you for your comment.</p>

Comment #	Individual/ Organization	Comment	CHA Response
33	Tamiko Holt	So I'm apprehensive about that program because the fact of the matter is, it's not just being done here. It's being done around the United States, right, in other PHAs. The thing about that is, I already talked about me thinking about you guys cherry picking off the wait list. Right, that's number one. But single parents have -- working single parents have a problem with meeting the, what do you call it, as far as -- it's not the work requirement. Even making \$15 an hour, you can't even meet the -- You cannot meet the -- what do you call it -- rent requirement here. Market rates here in Chicago. So when you guys talk about families, when you guys talk about family, you don't talk about what makes up a family. A single family of four could be a single mother, a single father and three children. It don't necessarily have to be a mother and father and two children. So that kind of scares me. So when you do this, and you kick people off the program in eight years, what happens to them? What's going to happen to them?	Thank you for your comment, CHA would like to clarify a couple of points. a) The time line of 8 years was based on the average number of years that a household participates in the HCV program. b) The selection process for the 100 families would be from the lower 50% of the wait list as an incentive to participate. Families would opt in, not be cherry picked nor have a requirement to participate. c) The 100 families would be from 2 distinct groups: 50 families who are at 51-80% of the AMI who would be enrolled in FamilyWorks program, and the second 50% who are at 0-50% of AMI and enrolled in the FSS program. d) No one will be removed from voucher assistance at the end of the demonstration, rather people will either be able to transition off or they will remain to receive a frozen HAP amount based on the amount received at the end of the program. e) The purpose of the demonstration is to see if level of AMI at entrance makes a difference in how long assistance is needed, when supports are provided. CHA will also look at similarly situated households who would not be receiving services, but who are from the same income categories for comparison.
34	Francine Washington	100 percent -- what people are you pulling from?	We think you are referencing the Time Limit Demonstration Program, if so, the 100 families would be from 2 distinct groups: 50 families from 51-80% of the AMI who would be enrolled in FamilyWorks program, and the second 50% who are at 0-50% of AMI and enrolled in the FSS program.
35	Tamiko Holt	Can we have other meetings and get more people out here?	Your comment has been received.

Comment #	Individual/ Organization	Comment	CHA Response
36	Francine Washington	I realize the program ya'll wrote up these programs, you have people. I know you have a lot of people that work for CHA that have DDTs and ABCs and 1,2, 3s behind their name, but you're sitting down making out a plan for how my future goes, how my style of living should go. They don't feel that, they don't know what goes on from day-to-day. The way they word some of this stuff, it's not matching up with what reality is, what is happening out there. They don't know what people go through. We put in so many calls a day for CHA. People are burned out, the occupancy, to them to everyone, they don't know what's going on out there. They make all this sound good. We're going to write it up like this, but in reality it's not worded right because it don't fit what's going on out there. That's how we lose out.	Your comment has been received.
37	Willie Lewis	My question is in terms of the demonstration program for term for HCV, if we can have it down here, there's not a detail in terms of the profile of the families that you're going to select for the program. For example, we just had a take flight program where we sent 150 students off to college. Some of those families reside in HCV who have three or four children who are on the college track. So if that family is selected to be in this program for this certain time, eight years, and if children are graduating high school going to college but their eight-year term is up, then what happens to that family? Because sometimes people use public housing to educate their children and then they do move on. So I think it's very important that whoever develops this program needs to develop a profile of the 100 residents you're going to select to be in this program.	<p>Thank you for your comment, CHA would like to clarify a couple of points.</p> <p>a) The time line of 8 years was based on the average number of years that a household participates in the HCV program.</p> <p>b) The selection process for the 100 families would be from the lower 50% of the wait list as an incentive to participate. Families would opt in, not be cherry picked nor have a requirement to participate.</p> <p>c) The 100 families would be from 2 distinct groups: 50 families who are at 51-80% of the AMI who would be enrolled in FamilyWorks program, and the second 50% who are at 0-50% of AMI and enrolled in the FSS program.</p> <p>d) No one will be removed from voucher assistance at the end of the demonstration, rather people will either be able to transition off or they will remain to receive a frozen HAP amount based on the amount received at the end of the program.</p> <p>e) The purpose of the demonstration is to see if level of AMI at entrance makes a difference in how long assistance is needed, when supports are provided. CHA will also look at similarly situated households who would not be receiving services, but who are from the same income categories for comparison.</p>

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38	Claudice Ware	On Page 4 of 8, the self sufficiency program, can you tell me how you modified this? How should this program really support the families that have been living in HCV and public housing and they already work? How will this program actually help them at any point?	The modification is to remove the requirement that a resident/participant must have had a recertification within 120 days. This is a barrier for people to participate.
39	Willie Lewis	Do we plan to do an AMI class? The last one that we did was quite some time ago. I think we need to.	Unfortunately, we're not familiar with the AMI class you are referencing.
40	Francine Washington	Quick question, how soon are we going to get the comments because some of the comments I know will be worded wrong. We don't like it wrong. Do we get them at the eleventh hour? We can comment on comments because some comments you give is not – the answer – the answer is not worded right.	The public comment period ended on August 31, at 5 p.m. CHA makes every effort to provide thoughtful responses to each substantive comment, as quickly as possible, and CHA anticipates providing the Board of Commissioners with responses to all comments on or around September 12.
41	Francine Washington	It's too vague and some of the stuff they are talking about, you just – you laugh yourself on some of them.	Thank you for your comment. Section 3 of the Annual Plan includes detailed information about proposed MTW activities and Section 4 includes detailed information about approved MTW activities. These details include but are not limited to the description and impact of the activity, the statutory objective and metrics.
42	Tamiko Holt	So what was our rebuttal to the consensus saying well, you guys are hogging the vouchers. I can give you a whole big response on from when the building was torn down what was not done up until the present. So we can go there at the round table.  I said at the round table.	Your comment has been received.

Comment #	Individual/ Organization	Comment	CHA Response
43	Pastor Erik Christensen <pastorerik@stlukesLS.org>	<p>On behalf of the 100 members of St. Luke's Lutheran Church of Logan Square, I am writing to urge CHA to remove 111 inappropriate units from consideration as family public housing replacement units on Chicago's North and Northwest sides.</p> <p>St. Luke's has been doing ministry with and for our neighbors in Logan Square for nearly 120 years, and has seen this neighborhood through periods of intense investment and disinvestment. At present, with land values skyrocketing, we see very little being done to preserve public and affordable housing for those who have grown up, raised families and built community here for generations. As a result, we are proud to be working in coalition with the Chicago Housing Initiative, the Logan Square Neighborhood Association, the Lathrop Leadership Council, and the Logan Square Ecumenical Alliance to preserve and create affordable opportunities for all our neighbors to live with dignity in this neighborhood.</p>	Your comment has been received.
44	Pastor Erik Christensen	<p>In February, CHA wisely committed to replace the 525 public housing units that will be eliminated at the Lathrop Homes by "producing 525 new housing opportunities in general and opportunity areas in the north side of the city." But CHA's Draft Annual Plan lists 81 units that are utterly bogus as Lathrop replacement units – and another 30 units that are inappropriate. (The units are listed in the CHA's RAD conversion table, on pages 104 and 105.) First, Mulvey Place and Crowder Place – with a combined total of 78 units – are existing senior buildings, while the Lathrop Homes has always been family housing. Chicago's North and Northwest sides have a significant number of CHA senior buildings, but need much more low-income family housing. Mulvey Place and Crowder Place have long provided affordable senior housing. Residents, community leaders and elected officials united to save these buildings as senior housing. CHA is to be commended for purchasing these buildings, along with Devon Place, early in 2016. But that's no excuse for mixing apples and oranges. Second, most of the units in the Mulvey and Crowder buildings are already occupied; none of them represent new housing opportunities! Third, three units at Devon Place are studio apartments (so are a total of 21 units</p>	CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city. CHA is continuing to work with developers, Alderman and other partners to provide additional units.

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		in the Mulvey and Crowder buildings). Studios cannot replace Lathrop Homes apartments, which are one, two or three-bedroom homes. They must be replaced with no loss of bedrooms. Finally, while not designated as senior housing, Devon Place includes 30 more existing affordable units, most of them already occupied. Replacing the 525 Lathrop units represents a once-in-a-generation opportunity for the CHA to realize the Fair Housing Act's mandate to "affirmatively further fair housing" in an economically thriving, increasingly exclusive part of a segregated city. The 111 units listed in the draft Annual Plan do not meet that standard. Please remove the Mulvey Place, Crowder Place and Devon Place units from the list of Lathrop Homes RAD transfer (replacement) units. Thank you.	
45	Rachel Coffee	I am writing to urge the Chicago Housing Authority to remove 111 inappropriate units from consideration as family public housing replacement units on Chicago's North and Northwest sides. In February, CHA wisely committed to replace the 525 public housing units that will be eliminated at the Lathrop Homes by "producing 525 new housing opportunities in general and opportunity areas in the north side of the city." But CHA's Draft Annual Plan lists 81 units that are utterly bogus as Lathrop replacement units, and another 30 units that are inappropriate. (The units are listed in the CHA's RAD conversion table, on pages 104 and 105.) First, Mulvey Place and Crowder Place – with a combined total of 78 units – are existing senior buildings, while the Lathrop Homes has always been family housing. Chicago's North and Northwest sides	CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city. CHA is continuing to work with developers, Alderman and other partners to provide additional units.

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46	James Cappleman, Alderman 46th Ward	<p>I want to commend CHA for their commitment to produce 525 public housing units in response to the 525 public units that would be lost at Lathrop Homes. With more and more people experiencing extreme financial difficulty, it's more important than ever that we do everything we can to provide more affordable housing within the City of Chicago. Regarding the CHA Proposed FY2017 MTW Annual Plan, I urge CHA to remove 81 units from consideration as replacement of lost housing in their effort to produce 525 additional public housing units as a response to what is happening at Lathrop Homes. The following reasons are:</p> <ul style="list-style-type: none"> <li>• CHA's purchase of Mulvey and Crowder Place was done to prevent the loss of their loss of 81 units at Presbyterian Homes senior housing, not the loss at Lathrop Homes.</li> <li>• The units at Mulvey and Crowder Place are already occupied, so they should not be counted as replacement.</li> <li>• It would not be fair to replace 2 and 3-bedroom apartments with studios that currently exist at Mulvey and Crowder Place.</li> <li>• At a minimum, the ratio of family housing to senior housing at Lathrop Homes needs to be replaced. It would not be fair to replace more of the lost family housing at Lathrop with senior housing elsewhere.</li> </ul>	<p>CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city. CHA is continuing to work with developers, Alderman and other partners to provide additional units.</p>

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47	c126yaleblook@yahoo.com	<p>Whereas the residents of the 9th Ward (West Pullman) have been deemed an opportunity area for low income housing placement of Section 8 and HCV families. The residents were not made of aware of this transition taking place within their community nor were they included in the implementing of the program policies and procedures that has greatly impacted the community in a negative way. The residents have learned in most instances that the program is hugely mismanaged often ignoring illegal behavior and other malicious activity. It also lacks accountability on all levels and support and protects participants with ill intentions living in our community.</p> <p>We the undersigned petition US Congress, HUD and CHA as follows:</p> <ul style="list-style-type: none"> <li>• Place a temporary halt on local housing assistance program(s) (includes waitlists/placement/opportunity area placement/re-location) until program re-evaluate and re-write policies and procedures.</li> <li>• Re-evaluate and re-write the policies and procedures of the program to address taxpaying resident's needs.</li> <li>• Re-evaluate and re-write the policies and procedures of the program and include safety plan for residents reporting program participant problematic behaviors and criminal activity.</li> <li>• Re-evaluate and re-write the policies and procedures which will hold all contractual parties involved PHA's, Program Participant and Landlords accountable for any malicious activity, which is repeatedly committed or goes unaddressed while in the program or while receiving government assisted rent payments.</li> <li>• Re-evaluate the policies and procedures that will include step by step systematic termination process when policies and procedures are violated by all contractual parties involved (PHA, Program Participant and Landlord(s)).</li> <li>• Include in re-written policies and procedures mandatory educational classes for landlords and program participants (partnering with community agencies) that will enable families to become self-sufficient, have neighborly behavior and ultimately be an added asset to the community.</li> </ul>	Your comment has been received.

Comment #	Individual/ Organization	Comment	CHA Response
48	Erika Dornfeld	<p>I am a member of a church in Logan Square, and we have been standing alongside the residents of Lathrop Homes in their efforts to keep units affordable, as it serves a vanishing, yet essential, need for the neighborhood. Affordable housing protects those most vulnerable to the impacts of neighborhood and economic shifts. Lathrop Homes as envisioned by its residents (see details below) is essential to a flourishing Logan Square. In February, CHA wisely committed to replace the 525 public housing units that will be eliminated at the Lathrop Homes by “producing 525 new housing opportunities in general and opportunity areas in the north side of the city.” But CHA’s Draft Annual Plan lists 81 units that are utterly bogus as Lathrop replacement units, and another 30 units that are inappropriate. (The units are listed in the CHA’s RAD conversion table, on pages 104 and 105.) First, Mulvey Place and Crowder Place – with a combined total of 78 units – are existing senior buildings, while the Lathrop Homes has always been family housing. Chicago’s North and Northwest sides have a significant number of CHA senior buildings, but need much more low-income family housing. Mulvey Place and Crowder Place have long provided affordable senior housing. Residents, community leaders and elected officials united to save these buildings as senior housing. CHA is to be commended for purchasing these buildings, along with Devon Place, early in 2016. But that’s no excuse for mixing apples and oranges. Second, most of the units in the Mulvey and Crowder buildings are already occupied; none of them represent new housing opportunities! Third, three units at Devon Place are studio apartments (so are a total of 21 units in the Mulvey and Crowder buildings). Studios cannot replace</p>	<p>CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city. CHA is continuing to work with developers, Alderman and other partners to provide additional units.</p>

Comment #	Individual/ Organization	Comment	CHA Response
		Lathrop Homes apartments, which are one, two or three-bedroom homes. They must be replaced with no loss of bedrooms. Finally, while not designated as senior housing, Devon Place includes 30 more existing affordable units, most of them already occupied. Replacing the 525 Lathrop units is a vital opportunity for the CHA to move toward meeting the Fair Housing Act's mandate to "affirmatively further fair housing" in an economically thriving, but increasingly exclusive, part of a segregated city. The 111 units listed in the draft Annual Plan do not meet that standard. Please remove the Mulvey Place, Crowder Place and Devon Place units from the list of Lathrop Homes RAD transfer (replacement) units. Thank you for your time!	
49	Ellen Ray, Executive Director Center for Changing Lives	On behalf of the more than six hundred households served by Center for Changing Lives, I am writing to urge the Chicago Housing Authority to remove 111 inappropriately designated units from consideration as family public housing replacement units on Chicago's North and Northwest sides. Center for Changing Lives partners with households held back by lack of resource or economic opportunity in order to uncover possibilities, overcome barriers, and realize their potential. CCL provides HUD certified housing counseling to households seeking housing options within their budget as part of its financial coaching program. Regularly, CCL encounters the challenge of a lack of affordable housing options on the north and northwest side when assisting households with housing opportunities. CCL appreciates that, in February, CHA wisely committed to replace the 525 public housing units that will be eliminated at the Lathrop Homes by "producing 525 new housing opportunities in general and opportunity areas in the north side of the city." However, CCL is disappointed that CHA's Draft Annual Plan lists 111 units that are utterly inappropriate	CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city. CHA is continuing to work with developers, Alderman and other partners to provide additional units.

Comment #	Individual/ Organization	Comment	CHA Response
		<p>to be included as Lathrop replacement units (The units are listed in the CHA's RAD conversion table, on pages 104 and 105).The inclusion of these units is ridiculous for the following reasons:78 units are senior units, when Lathrop Homes has been family housing. Mulvey Place and Crowder Place – with a combined total of 78 units – are existing senior buildings, while the Lathrop Homes has always been family housing. Chicago's North and Northwest sides have a significant number of CHA senior buildings, but need much more low-income family housing. CHA is to be commended for purchasing these buildings, along with Devon Place, early in 2016. However, that's no excuse for supplanting family housing with senior housing.Most of the 78 units in the Mulvey and Crowder buildings and 30 units at Devon Place are already occupied; none of them represent new housing opportunities. The 525 replacement units must be new, family housing opportunities to be considered replacements for Lathrop Homes units lost.24 units are studio apartments (three at Devon Place and twenty one units in the Mulvey and Crowder buildings). Studios cannot replace Lathrop Homes apartments, which are one, two or three-bedroom homes. They must be replaced with no loss of bedrooms.Replacing the 525 Lathrop units is a vital opportunity for the CHA to move toward meeting the Fair Housing Act's mandate to "affirmatively further fair housing" in an economically thriving, but increasingly exclusive, part of a segregated city. The 111 units listed in the draft Annual Plan do not meet that standard and must be removed.</p>	

Comment #	Individual/ Organization	Comment	CHA Response
50	Christopher Wilmes / CAC	CHA is proposing a demonstration program in which 100 families will be given an eight-year time limit on their Section 8 Housing Choice Voucher. The CAC opposes this demonstration program because it is the first step towards time limits on all public housing units and Section 8 vouchers. There are two reasons why the CAC opposes these time limits. First, the CHA's family works program has proved ineffective at helping residents become self-sufficient. In Chicago, it is difficult for individuals without college degrees to find full-time employment that permits them to pay for market rate housing, even with quality support services. For this reason, it seems arbitrary to take away someone's subsidy after eight years. Even a well-intentioned resident who secures a forty-hour per week job earning the minimum wage (or slightly above the minimum wage) is ill equipped to pay full market rate rent, even after receiving a subsidy for eight years. Second, the answer to the scarcity of affordable housing is not time limits on subsidies, but, rather, more subsidies paired with a work requirement. The individuals who receive subsidies often need them for more than eight years - especially single parents with children - and they should be able to receive them for more than eight years.	Thank you for your comment, CHA would like to clarify a couple of points. a) The time line of 8 years was based on the average number of years that a household participates in the HCV program. b) The selection process for the 100 families would be from the lower 50% of the wait list as an incentive to participate. Families would opt in, not be cherry picked nor have a requirement to participate. c) The 100 families would be from 2 distinct groups: 50 families who are at 51-80% of the AMI who would be enrolled in FamilyWorks program, and the second 50% who are at 0-50% of AMI and enrolled in the FSS program. d) No one will be removed from voucher assistance at the end of the demonstration, rather people will either be able to transition off or they will remain to receive a frozen HAP amount based on the amount received at the end of the program. e) The purpose of the demonstration is to see if level of AMI at entrance makes a difference in how long assistance is needed, when supports are provided. CHA will also look at similarly situated households who would not be receiving services, but who are from the same income categories for comparison.
51	Christopher Wilmes / CAC	The 2017 Annual Plan suggests that new units at Presbyterian Homes will be considered replacement housing for the units being lost at Lathrop Homes. The CAC opposes this designation because it means that senior housing will be used to replace family housing. When the Plan For Transformation commenced in 2000, the CHA's portfolio included 16,500 units of family public housing. At this time, CHA has approximately 10,000 public housing units. Given this massive loss of family public housing, CHA should not be replacing family public housing units with senior public housing units. All 525 units lost through the Lathrop Homes redevelopment process should be replaced with family public housing units on the north side of Chicago.	CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city. CHA is continuing to work with developers, Alderman and other partners to provide additional units.

Comment #	Individual/ Organization	Comment	CHA Response
52	Christopher Wilmes / CAC	The Plan makes no reference whatsoever to planned development at LeClaire Courts, even though that property was demolished six years ago. The CHA should amend the Plan to include planned development activities at LeClaire Courts.	CHA is reviewing the existing plans. Proposed revisions will be presented to the Working Group before any decisions are made.
53	Christopher Wilmes / CAC	CHA should amend its MTW plan to adjust the minimum rent back down to \$50. There is no good reason for CHA to charge its lowest income residents more than the U.S. Housing Act permits. The CAC understands that residents can apply for a hardship exemption, but property managers do not adequately notify residents of this option during recertification meetings. As a result, very-low income residents do not apply for the exemption, and CHA takes an additional \$25 per month from some of the absolute poorest residents in the City.	The CHA has no plans at this time to change its current minimum rent policy. The policy is consistent with HUD approval and the implementation of the hardship exemption is in compliance with HUD regulation language, guidance and policy.
54	Christopher Wilmes / CAC	CHA should fund and recognize tenant councils in mixed-income developments. CHA's decision to obtain a waiver from HUD on this issue was a mistake, as it leaves public housing residents without an adequate voice. CHA should recognize and fund tenant organizations for these mixed income developments, so they can participate - along with the CAC - in addressing issues of public housing residents.	The Ombudsman is to recognize spokespersons for mixed-finance resident groups as permitted under the MTW Agreement.
55	Christopher Wilmes / CAC	CHA should amend its MTW plan to eliminate the current two heartbeats to a room policy. Currently, the CHA's policy requires two people to share a bedroom regardless of age and regardless of gender. The CAC proposes the following policy instead, "The dwelling unit must have at least one bedroom or living/sleeping room for each two persons. Children of the opposite sex, other than children under age five, may not be required to occupy the same bedroom or living/sleeping room."	Thank you for your comment, however this policy is not detailed in the Proposed FY2017 MTW Annual Plan.

Comment #	Individual/ Organization	Comment	CHA Response
56	Barbara Burns	<p>My family resided at Lathrop Homes from 1955 to 1971. I grew up there, went to Schneider School and got my first job at what was then the Lathrop Chicago Boys Club. As a child, I children of all different races, religions and ethnic backgrounds without thinking twice about it. I look back now and I realize the importance of subsidized, affordable public housing to my parents. My family needed the security of a roof over our collective head. Today is no different, affordable housing at every income level is essential to the well-being of the city of Chicago and its citizens. I know that many replacement units were promised as public housing projects were systematically bulldozed, yet so few units were built. Therefore, please understand that I am deeply troubled by the current state of Lathrop Homes with 753 of 925 units boarded up and the proposed elimination of 525 public housing units onsite once redevelopment is completed.</p> <p>I have learned that to secure HUD Rental Assistance Demonstration program funding at Lathrop, CHA will be required to identify the replacement of all units lost in each phase of the redevelopment. According to the developers, 280 public housing units will be lost in the first phase of redevelopment. They are estimating completion of phase 1A by the end of 2018. I do not see that the FY2017 MTW Annual Plan addresses anywhere near these numbers. I think the approximately 60 units listed on p105 at 6418 N. Sheridan are a good start. These are new units not currently in the pipeline and are listed as “family” units.</p> <p>However, the three Presbyterian Home buildings listed on p104 are not in keeping the promise of replacing Lathrop Homes units. These buildings have been senior housing. The majority of the 111 units in these buildings are no bedroom or one bedroom units, hardly adequate for a family. Lathrop replacement units should reflect the same number of bedrooms present in the units that have been eliminated. Many of the Presbyterian Home units are already occupied. None of these units should be counted toward the 525 Lathrop replacement units.</p> <p>I would have thought there might be discussion of the Lathrop redevelopment itself and the replacement units in the body of the CHA Proposed FY2017 MTW Annual Plan.</p>	CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city. CHA is continuing to work with developers, Alderman and other partners to provide additional units.

Comment #	Individual/ Organization	Comment	CHA Response
57	Lori Clark	On behalf of the 500 members of the Jane Addams Senior Caucus. I am writing to urge the CHA to remove 81 inappropriate units from consideration as Lathrop Homes replacement public housing units on Chicago's North and Northwest sides. Jane Addams Senior Caucus is a multiracial grassroots organization led by concerned seniors in the Chicago metropolitan area. We cross neighborhood, racial, religious and socio-economic lines to find common ground upon which to act on our values. Through leadership development, organizing and popular education, we use the power of our collective voice to work for economic, social and racial justice for all seniors and our communities. Affordable subsidized housing is a core concern for seniors in our membership in the city of Chicago. In February, CHA wisely committed to replace the 525 public housing units to be eliminated at the Lathrop Homes by "producing 525 new housing opportunities in general and opportunity) areas in the	CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city. CHA is continuing to work with developers, Alderman and other partners to provide additional units.

Comment #	Individual/ Organization	Comment	CHA Response
		<p>north side of the city. But the CHA's Draft Annual Plan lists a total of 81 units that are utterly inappropriate as Lathrop replacement units. (The units are listed in the RAD conversion table on pages I04 - I05.) First, Mulvey Place and Crowder Place – with a combined total of 78 units – are senior housing, while the Lathrop Homes has always been family housing. Chicago's North and Northwest sides have a significant number of CHA senior buildings, but very little family housing. Mulvey and Crowder have long provided affordable senior housing. Residents, community leaders and elected officials fought to save them as senior housing, and CHA is to be commended for purchasing these buildings early in 2016. But that's no excuse for mixing apples and oranges. Second, most of the units in Mulvey and Crowder are already occupied – they do not represent housing opportunities! Finally, a combined total of 21 units in the Mulvey and Crowder buildings are studio apartments, as are three units at Devon Place. Studios cannot replace lost Lathrop Homes units. The homes being eliminated at Lathrop are one, two or three-bedroom units. They must be replaced with apartments with the same number of bedrooms, or more. Please promptly remove these 81 units from consideration as Lathrop replacement units.</p>	

Comment #	Individual/ Organization	Comment	CHA Response
58	Rev. Paula Cripps-Vallejo <revpaulacrippsvallejo@gmail.com>	<p>On behalf of the 100 members and their families that are active at Humboldt Park United Methodist Church, I am writing to urge the Chicago Housing Authority to remove 111 inappropriate units from consideration as family public housing replacement units on Chicago's North and Northwest sides. As people of faith, we cannot stand silently while the people who need a home and are struggling in this city continue to suffer. We are a dominantly Latino congregation that has a huge heart for affordable and public housing. Our very own church building has 11 units of affordable apartments (9 one-bedroom and 2 three-bedrooms) since our building was built in 1928. Additionally, for over 30 years we had a homeless shelter with 60 beds for men, and a transitional shelter for up to 30 women and children escaping domestic violence. There has long been, and will continue to be, a need for low-income housing in our area, if we are truly to thrive as the city of Chicago. As Logan Square and Humboldt Park continue to lose affordable apartments and homes to condos and other high-priced developments, NOW is the time for the Chicago Housing Authority to do YOUR part to ensure that affordable housing. Many members of our congregation continue to be pushed out of the neighborhoods they have long called home, partially because the CHA has continued to break promises to those who most need it. In February, CHA wisely committed to replace the 525 public housing units that will be eliminated at the Lathrop Homes by "producing 525 new housing opportunities in general and opportunity areas in the north side of the city." Our congregation (Humboldt Park United Methodist Church) has been working for this to be a reality through actions and marches at both Lathrop Homes and City Hall. We need the 525 units replaced. But CHA's Draft Annual Plan lists 81 units</p>	CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city. CHA is continuing to work with developers, Alderman and other partners to provide additional units.

Comment #	Individual/ Organization	Comment	CHA Response
		<p>that are utterly bogus as Lathrop replacement units – and another 30 units that are inappropriate. (The units are listed in the CHA’s RAD conversion table, on pages 104 and 105.)First, Mulvey Place and Crowder Place – with a combined total of 78 units – are existing senior buildings, while the Lathrop Homes has always been family housing. Chicago’s North and Northwest sides have a significant number of CHA senior buildings, but need much more low-income family housing. Mulvey Place and Crowder Place have long provided affordable senior housing. Residents, community leaders and elected officials united to save these buildings as senior housing. CHA is to be commended for purchasing these buildings, along with Devon Place, early in 2016. But that’s no excuse for mixing apples and oranges.Second, most of the units in the Mulvey and Crowder buildings are already occupied; none of them represent new housing opportunities!Third, three units at Devon Place are studio apartments (so are a total of 21 units in the Mulvey and Crowder buildings). Studios cannot replace Lathrop Homes apartments, which are one, two or three-bedroom homes. They must be replaced with no loss of bedrooms. Finally, while not designated as senior housing, Devon Place includes 30 more existing affordable units, most of them already occupied.Replacing the 525 Lathrop units represents a once-in-a-generation opportunity for the CHA to realize the Fair Housing Act’s mandate to “affirmatively further fair housing” in an economically thriving, increasingly exclusive part of a segregated city. The 111 units listed in the draft Annual Plan do not meet that standard.Please remove the Mulvey Place, Crowder Place and Devon Place units from the list of Lathrop Homes RAD transfer (replacement) units.</p>	

Comment #	Individual/ Organization	Comment	CHA Response
59	Charles Lyons, Sue Cooper <Sue.Cooper@armitagechurch.org>	<p>As spiritual shepherd of 1000+ families and having served several thousand more over the four decades of my tenure, I find it hard to believe we have to beg and plead for crumbs from the very people who ought to be advocates for and servants of people who need housing.</p> <p>You have to know the plan you are floating is unreasonable and insulting. Jose, Minerva, Debra, Yolanda, Steve, Mattie, Carol, James, Sonia, Joaquin are people you are supposed to be serving. Honestly. How do you sleep at night?</p> <p>It is in your power to champion the cause of those who you have been charged to serve. Would you please refuse to be the typical bureaucrat? Would you please refuse to be a puppet? Would you be a voice of right, of service, of help?</p> <p>After all of the CHA mismanagement, deception and political games, this is a moment in which you can make a real difference.</p> <p>You have been given a stewardship. You will give an account. God is not blind, deaf, or dumb.</p>	Your comment has been received.

Comment #	Individual/ Organization	Comment	CHA Response
60	Proco Joe Moreno / Alderman, 1st Ward	<p>I am writing on behalf of residents and families from Lathrop and the surrounding 1st Ward community, to urge the Chicago Housing Authority (CHA) to remove 111 inappropriate units from consideration as family public housing units on Chicago's North and Northwest sides from the CHA Proposed FY2017 MTW Annual Plan. In February 2016, the CHA provided a written commitment to return the remaining 525 units of public housing, not returning to Lathrop, to the Northside of Chicago. While this effort is commendable, the current CHA Draft Annual Plan lists 81 units that are inconsistent with the goals of replacing lost Lathrop units, and another 30 units that are inappropriate replacement units. (The units are listed in the CHA's RAD conversion table, on pages 104 and 105.) For example, Mulvey Place and Crowder Place – with a combined total of 78 units – are existing senior buildings, while Lathrop Homes has always been family housing. These buildings are already occupied and none of these units represent new housing opportunities for families. Also, Devon Place and Mulvey and Crowder buildings have studio apartments, which should not be considered as Lathrop replacement apartments since it does not accommodate for families with one, two or three-bedroom homes. Finally, while Devon Place includes 30 more existing affordable units, most of these units are already occupied. Replacing the 525 Lathrop units represents a once-in-a-generation opportunity for the CHA to realize the Fair Housing Act's mandate to "affirmatively further fair housing" in an economically thriving, increasingly exclusive part of a segregated city. The 111 units listed in the draft Annual Plan do not meet that standard. Please remove the Mulvey Place, Crowder Place and Devon Place units from the list of Lathrop Homes RAD transfer (replacement) units. Thank you.</p>	<p>CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city. CHA is continuing to work with developers, Alderman and other partners to provide additional units.</p>

Comment #	Individual/ Organization	Comment	CHA Response
61	Elizabeth Rosenthal / LAF	<p>I. Including the Francis Cabrini Rowhouses in “Dwelling Demolition” (pages 15-16, 21) CHA has included in its plan the “possible” demolition of the Francis Cabrini Rowhouses. HUD should reject a proposal that does not contain a firm plan for implementation, and in this case, any such plan is premature.</p> <p>Including the Rowhouses in dwelling demolition is premature because the Rowhouses are subject to a settlement agreement entered in the Gautreaux litigation which provides, in part, that the future of the Rowhouses will be decided in the context of a Request for Proposals from the Near North Working Group. Demolition is not certain, and many steps, including completing the required Section 106 process, which stalled in 2014, must be completed before any plan is executed.</p> <p>Accordingly, CHA should remove – or HUD should reject – this proposal at this time, especially in light of the fact that CHA may file an Amended MTW Plan if plans for the Rowhouses are finalized in 2017.</p>	Any pending actions involving properties are included in the MTW Annual Plan for submittal to HUD. As stated in the Plan, only in the event the selected Developer recommends any demolition, will it proceed. In order to expedite the process and stay in compliance with the settlement order, the CHA included the potential demolition of the Rowhouses. This avoids the CHA having to complete an MTW amendment, comment period, and await another HUD approval. Such repetitive steps can delay construction/rehabilitation of units.
62	Elizabeth Rosenthal / LAF	<p>II. Counting Project Based Vouchers toward unit delivery under the Plan (pages 17-19, 46)As we have stated in previous comments, PBV units should only count toward the 25,000 units only if they will be available to families with a Right of Return (i.e. 10/1/99 families), rather than only to people on the project-based voucher waiting list and other special populations, such as formerly homeless people or people who need additional supportive services. Additionally, we are troubled by CHA’s proposal to count Mod Rehab conversion to PBV toward the 25,000 unit delivery. Mod Rehab units existed at the time the Plan for Transformation was approved and implemented, and were not included in its purview. While we are glad that CHA is preserving Mod Rehab units through conversion to PBV, it really results in a net loss of low-income housing stock in Chicago if those units are counted toward the 25,000. Additionally, these units will likely draw from a PBV or special populations waitlist and not be fully accessible to 10/1/99 families. Finally, many if not most or all Mod Rehab units are studio or one-bedroom units. Families with a Right of Return and families from CHA’s waitlists need larger bedroom sizes. With such a great need for affordable housing in this City, CHA should be expanding housing opportunities beyond the 25,000 replacement units and PBVs that are unavailable to families with a Right of Return therefore should not be included in the 25,000 replacement unit count.</p>	Thank you for your comment.

Comment #	Individual/ Organization	Comment	CHA Response
63	Elizabeth Rosenthal / LAF	<p>III. Changes to the CHA waitlists (pages 30-31)</p> <p>CHA proposes a transition to site-based wait lists from a community wide waitlist, and no longer use a “first available” wait list. CHA proposes rolling this out through outreach to people on the waitlists who must respond with a site-based preference. Although CHA is scant on the details of this proposed outreach and how families will be expected to respond, CHA proposes removing families that do not respond from the waitlist. HUD should require more details before approving this activity, and families that are removed from the waitlist should have an opportunity to ask CHA to review that decision, like the informal review process for applicants denied admission to housing.</p>	<p>The process is set forth in the Plan as follows:</p> <p>All existing Family Waitlist applicants will receive notification of CHA’s intent to transition to Site-Based Waitlists through the standard waitlist update process. CHA will communicate with applicants by first class mail, electronic mail, and automated robo calls. Applicants will be notified that they have 30 calendar days from the date of the first notice to respond to the update and select a site-based waitlist or risk being removed from the waitlist—‘Geographic Region or First Available Waitlist’. Applicants who do not respond within 30 calendar days will be mailed a second notice and will have 15 calendar days from the date of the second notice to make their site-based waitlist selection. At the end of the 15 calendar days, a final status letter will be sent to applicants confirming their site-based waitlist selection or informing them of their removal from the waitlist due to their non-responsiveness.</p>

Comment #	Individual/ Organization	Comment	CHA Response
64	Elizabeth Rosenthal / LAF	<p>IV. Time Limit Demonstration We oppose implementation of a time-limit demonstration for the Housing Choice Voucher program. In a perfect world, Chicago families would have access to jobs that pay a living wage, and to social services that allow them to get and keep these jobs, and therefore not need rental assistance. But that is not the case, and the services that assist such families are fast disappearing, like access to low-cost, quality childcare that allows parents to work. At the same time, the cost of living is ever-increasing, while relative wages are decreasing. A 2015 study showed that a single person in Chicago would need to earn \$37,000 to rent a one-bedroom apartment. That's more than a full-time minimum wage job provides. Finding full time work, even at minimum wage, can be difficult, and underemployment is rife in CHA's population. While we applaud CHA's desire to assist its families to become more economically stable, this demonstration program is a stick, not a carrot. A time limit, much like welfare reform, punishes very low-income families, often families with children, simply for being poor. CHA (and HUD) should be expanding affordable housing opportunities, not treating its current programs as a zero-sum game where some low-income families benefit and some do not. While a demonstration program might be a way to study the effects of intensive social services on a small group of HCV families, the result should not be "frozen HAP" and the possibility of destabilization for a vulnerable, low-income family. The City of Chicago has adopted a "Housing First" policy, which focuses on the retention of safe, stable housing, rather than cycling families in and out of homelessness. CHA should follow suit.</p>	<p>Thank you for your comment, CHA would like to clarify a couple of points. a) The time line of 8 years was based on the average number of years that a household participates in the HCV program. b) The selection process for the 100 families would be from the lower 50% of the wait list as an incentive to participate. Families would opt in, not be cherry picked nor have a requirement to participate. c) The 100 families would be from 2 distinct groups: 50 families who are at 51-80% of the AMI who would be enrolled in FamilyWorks program, and the second 50% who are at 0-50% of AMI and enrolled in the FSS program. d) No one will be removed from voucher assistance at the end of the demonstration, rather people will either be able to transition off or they will remain to receive a frozen HAP amount based on the amount received at the end of the program. e) The purpose of the demonstration is to see if level of AMI at entrance makes a difference in how long assistance is needed, when supports are provided. CHA will also look at similarly situated households who would not be receiving services, but who are from the same income categories for comparison.</p>

Comment #	Individual/ Organization	Comment	CHA Response
65	Elizabeth Rosenthal / LAF	<p>V. Minimum Rent (page 50)</p> <p>CHA should amend its MTW plan to return the minimum rent to \$50. First, CHA never properly received MTW authority to increase the minimum rent in the HCV Program, which it admits here, saying that it was approved “through the 2008 HCV Administrative Plan.” CHA never requested to implement the \$75 minimum rent in the HCV program through any Annual Plan.</p> <p>In addition, Property Managers and Housing Specialists do not properly screen residents who qualify for the exemption and thereby fulfill their duty to apply the minimum rent hardship exemption policy, nor do they notify residents and participants that the exemption is even available. While the 50058 set up through YARDI has an option to apply the minimum rent, it defaults to “N” for “no.” CHA does not adequately educate families about the hardship exemption, and we often find that families need the intervention of an attorney to assert their rights to a hardship exemption; worse yet, some families are terminated for failing to pay the minimum rent.</p> <p>CHA is achieving its MTW objective on the backs of some of the poorest program participants who are already struggling to pay utilities and other necessary expenses. The modest increase in revenue to CHA does not outweigh the burden on CHA’s poorest families and does not promote stability or self-sufficiency. There is no good rationale for CHA to charge more than the statute permits.</p>	<p>The CHA has no plans at this time to change its current minimum rent policy. The policy is consistent with HUD approval and the implementation of the hardship exemption is in compliance with HUD regulation language, guidance and policy.</p>

Comment #	Individual/ Organization	Comment	CHA Response
66	Elizabeth Rosenthal / LAF	<p>VI. Mobility Counseling Demonstration Program Work Requirement (pages 56-57)CHA should eliminate the work requirement from this demonstration because it provides disincentives for people to participate in a program that is already struggling to recruit volunteers. Adding a requirement that families be working in order to gain help in seeking housing in opportunity areas just adds another step in an already stress-filled and time-consuming process: identifying an appropriate neighborhood, identifying a landlord who will rent to a voucher holder (even though landlords are prohibited from discriminating against voucher holders), identifying an appropriate unit that meets the payment limits, passing inspection, etc. The goal of the MCD program is to help voucher holders access opportunity areas, and CHA is falling short of its goal. Before adding more hoops for participants to jump through, CHA should focus its efforts on helping participants find quality, affordable housing in opportunity areas and recruiting quality landlords with quality properties to participate. Again, like the City, CHA should adopt a “Housing First” policy that focuses on retaining, safe, decent, and affordable housing. Also, CHA still has not stated what happens if someone who is participating in the MCD fails to comply with the work requirement – it is unclear whether they will be terminated or subject to some other penalty. We are glad to see, however, that CHA is proposing to increase Safe Harbor to 180 days.</p>	<p>Thank you for your comment. We find no evidence of people not wanting to participate in the program nor are we falling short of the goals for this demonstration program. If a resident fails to comply with the work requirement, they will be subject to the same requirements as other residents (e.g. safe harbor).</p>
67	Elizabeth Rosenthal / LAF	<p>VII. Mixed-income Ombudsman (pages 65-66)</p> <p>CHA should rescind its policy against recognizing LACs at mixed-income properties. The waiver from the regulations requiring CHA to recognize, fund, and support tenant councils is unique in the country and HUD should never have granted it. CHA says the Ombudsman it provides is adequate, but that is not true. While this is certainly an important job, it is different in many respects from what a Local Advisory Council could do. The Ombudsman is, after all, ultimately a CHA employee, and residents have told us that sometimes the Ombudsman cannot or will not assist because of a purported “conflict of interest.”</p> <p>LACs provide a voice and an advocate for tenants within those communities and not just with CHA. As it stands now, Condo Associations are the only organized voice in most, if not all, of the mixed-income developments. Public housing residents are excluded from discussions about the communities themselves, except when CHA acts as their intermediary. This is disempowering and condescending to public housing residents. The CHA should reinstate LACs in the mixed-income communities to represent the voices of the public housing residents.</p>	<p>The Ombudsman is to recognize spokespersons for mixed-finance resident groups as permitted under the MTW Agreement.</p>

Comment #	Individual/ Organization	Comment	CHA Response
68	Elizabeth Rosenthal / LAF	<p>VIII. Exception Payment Standards</p> <p>In response to negative press in 2014 that made the exception rent program look like a waste of taxpayer money rather than an important tool to increase housing choice, mobility, and desegregation, CHA reduced its exception payment standard to 150% of FMR. CHA took this action without adequate study of its effect on mobility and the families already participating with rents higher than 150% of FMR. CHA should again implement a policy with higher exception rents to encourage mobility and housing choice in opportunity areas. Rents are getting higher and higher in opportunity areas, and program participants are being shut out as a result of CHA's arbitrary policy to reduce the exception rents to 150% of FMR.</p>	Thank you for your comment.
69	Elizabeth Rosenthal / LAF	<p>IX. PBV Contract Commitments with 16-30 year initial terms (pages 70-71)The PBV regulations provide for 15-year renewable contracts with an extension for up to 15 additional years, for a total of 30 years. The extension can be for less than 15 years, but the total number of extensions cannot exceed 15 additional years. See 24 C.F.R. § 983.205(b). CHA proposes to make the time limit on PBVs as little as 16 years, with no extension. When affordable housing preservation is at issue, this makes little sense. CHA should be working to guarantee contracts that last no less than a total of 30 years total. A sixteen-year contract with no extension does not provide enough long-term affordability. While we support CHA using its MTW authority to enter into initial contract terms of more than 15 years, CHA should plan to renew PBV contracts up to the 30-year maximum already provided by law.</p>	Thank you for your comment.
70	Elizabeth Rosenthal / LAF	<p>X. Replacement Housing at Lathrop</p> <p>CHA is seeking to make up public housing units lost in the redevelopment of Lathrop Homes with existing, mostly-occupied senior buildings (e.g., Presbyterian Homes, Mulvey Place, and Crowder Place). This is not acceptable because CHA is replacing family housing with senior housing. The Plan for Transformation has resulted in a significant net loss of family housing and while family housing waitlists are closed, senior waitlists are always open. We need more family housing, and CHA is not fulfilling its duty to affirmatively further fair housing by displacing low-income families with children, replacing lost family units with senior buildings that do not help satisfy families' Right of Return, and not providing adequate family housing in opportunity areas like the area around Lathrop Homes.</p>	CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city. CHA is continuing to work with developers, Alderman and other partners to provide additional units.

Comment #	Individual/ Organization	Comment	CHA Response
71	Elizabeth Rosenthal / LAF	XI. EID in RAD Developments We are glad to see that CHA has adopted housing advocates' recommendation to request MTW approval to carry over the EID upon RAD conversion.	Thank you for your comment.
72	Charles Hogren <cvhogren@gmail.com>	I am an immediate neighbor of the Julia C. Lathrop Homes, living for the past 43 years, directly across the street. I am writing about the new 525 public housing units you agreed, last February, to provide on the north side to replace the family units lost in the redevelopment of Lathrop Homes. It is distressing to discover that in your FY2017 Plan, 81 proposed replacement units are utterly bogus because most are already occupied, so they don't qualify as new, and 30 proposed replacement units are inappropriate, in that they are not family units. Why do you play these games? Do you believe the Department of Housing and Urban Development, city tax payers, newspapers, radio, and television stations won't notice? Maybe they won't, and you will get away with it. But, please try again, be honest, you can do better. Be accountable. Struggling families need housing. Meeting that need is your mission. Please remove the Mulvey Place, Crowder Place, and Devon Place units from the list of Lathrop Homes replacement units. Thank you.	CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city. CHA is continuing to work with developers, Alderman and other partners to provide additional units.
73	Bruce Ray /Kimball Avenue Church	On behalf of the 25 households of Kimball Avenue Church, I am writing to urge the Chicago Housing Authority to remove 111 inappropriate units from consideration as family public housing replacement units on Chicago's North and Northwest sides. The need for affordable housing and public housing on the north side has become painfully clear to us. The Julia C. Lathrop Homes was one of the only public housing options for Latino families. More and more of the members of Kimball Avenue Church are being pushed out of the community due to rising rents and housing prices, and there few options for affordable housing. We must replace the 525 units of public housing scheduled to be lost at Lathrop Homes with legitimate new housing options in the opportunity areas surrounding Lathrop. In February, CHA wisely committed to replace the 525 public housing units that will be eliminated at the Lathrop Homes by "producing 525 new housing opportunities in general and opportunity areas in the north side of the city." But CHA's Draft Annual Plan lists 81 units that are utterly bogus as Lathrop replacement units <sup>1</sup> and another 30 units that are inappropriate. (The units are listed in the CHA's RAD conversion table, on pages 104 and 105.) First, Mulvey Place and Crowder Place - with a combined total of 78 units - are existing	CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city. CHA is continuing to work with developers, Alderman and other partners to provide additional units.

Comment #	Individual/ Organization	Comment	CHA Response
		<p>senior buildings, while the Lathrop Homes has always been family housing. Chicago's North and Northwest sides have a significant number of CHA senior buildings, but need much more low-income family housing. Mulvey Place and Crowder Place have long provided affordable senior housing. Residents, community leaders and elected officials united to save these buildings as senior housing. CHA is to be commended for purchasing these buildings, along with Devon Place, early in 2016. But that's no excuse for mixing apples and oranges. Second, most of the units in the Mulvey and Crowder buildings are already occupied; none of them represent new housing opportunities. Third, three units at Devon Place are studio apartments (so are a total of 21 units in the Mulvey and Crowder buildings). Studios cannot replace Lathrop Homes apartments<sup>1</sup> which are one, two or three-bedroom homes. They must be replaced with no loss of bedrooms. Additionally, while not designated as senior housing, Devon Place includes 30 more existing affordable units, most of them already occupied. Replacing the 525 Lathrop units is a vital opportunity for the CHA to move toward meeting the Fair Housing Act's mandate to "affirmatively further fair housing" in an economically thriving, but increasingly exclusive, part of a segregated city. The 111 units listed in the draft Annual Plan do not meet that standard. Please remove the Mulvey Place<sup>1</sup> Crowder Place and Devon Place units from the list of Lathrop Homes RAD transfer (replacement) units.</p>	

Comment #	Individual/ Organization	Comment	CHA Response
74	Bhaskar S. Manda	<p>I am writing as a concerned resident of Logan Square to urge the Chicago Housing Authority to remove 111 inappropriate units from consideration as family public housing replacement units on Chicago's North and Northwest sides.</p> <p>I'm a board member at the Logan Square Neighborhood Association, and a member of Somos Logan Square, both of which seek to preserve affordable housing in Chicago, and especially in Logan Square and surroundings. Gentrification and the construction of towers of luxury apartments in the area are driving up rents and displacing families that need the facilities - such as neighborhood schools, transportation, and affordable retail - that are available in the area. As such, any loss of public housing units, especially its replacement with market-rate units, will severely and negatively impact the ability of the area to provide economic opportunity to area families.</p> <p>In February, CHA wisely committed to replace the 525 public housing units that will be eliminated at the Lathrop Homes by "producing 525 new housing opportunities in general and opportunity areas in the north side of the city." But CHA's Draft Annual Plan lists 81 units that are not valid as Lathrop replacement units, and another 30 units that are inappropriate. (The units are listed in the CHA's RAD conversion table, on pages 104 and 105.).</p> <p>1. Mulvey Place and Crowder Place – with a combined total of 78 units – are existing senior buildings, while the Lathrop Homes has always been family housing. Chicago's North and Northwest sides have a significant number of CHA senior buildings, but need much more low-income family housing. Mulvey Place and Crowder Place have long provided affordable</p>	CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city. CHA is continuing to work with developers, Alderman and other partners to provide additional units.

Comment #	Individual/ Organization	Comment	CHA Response
		<p>senior housing. Residents, community leaders and elected officials united to save these buildings as senior housing. CHA is to be commended for purchasing these buildings, along with Devon Place, early in 2016. But that's no excuse for mixing apples and oranges.</p> <p>2. Most of the units in the Mulvey and Crowder buildings are already occupied; none of them represent new housing opportunities!</p> <p>3. Three units at Devon Place are studio apartments (so are a total of 21 units in the Mulvey and Crowder buildings). Studios cannot replace Lathrop Homes apartments, which are one, two or three-bedroom homes. They must be replaced with no loss of bedrooms.</p> <p>4. While not designated as senior housing, Devon Place includes 30 more existing affordable units, most of them already occupied.</p> <p>Replacing the 525 Lathrop units is a vital opportunity for the CHA to move toward meeting the Fair Housing Act's mandate to "affirmatively further fair housing" in an economically thriving, but increasingly exclusive, part of a segregated city. The 111 units listed in the draft Annual Plan do not meet that standard. Therefore, please remove the Mulvey Place, Crowder Place and Devon Place units from the list of Lathrop Homes RAD transfer (replacement) units.</p>	
75	Jeremy Bergstrom / Sargent Shriver Center	<p>Section I, p. 8 – Rental Assistance Demonstration</p> <p>It is important that CHA clarify that it will not re-screen RAD residents at any time post conversion. Section 18-IV.C of CHA's HCV Administrative Plan needs to be amended so that it is consistent with the RAD statute and HUD guidance. CHA may not implement new screening criteria at the first, or any subsequent, recertification.</p>	CHA will follow the HUD RAD requirements for screening residents. Pursuant to the RAD statute, Section 1.6(C)(1), at conversion, current households are not subject to rescreening, income eligibility, or income targeting. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion.
76	Jeremy Bergstrom / Sargent Shriver Center	<p>Section II, p. 20 – Long Term Plan for Offline Units Status</p> <p>CHA should continue to bring all available units online. It is unconscionable that units of public housing has been available but sitting vacant for years, especially given the size of CHA's wait list and the size of Chicago's homeless population. CHA should publicly report its progress on making vacant and offline units available on a quarterly basis. This type of reporting would substantially increase CHA's credibility in the community.</p>	CHA does report on vacant and offline units on a quarterly basis. You can access these reports using this link: <a href="http://www.thecha.org/about/plans-reports/quarterly-report/">http://www.thecha.org/about/plans-reports/quarterly-report/</a>

Comment #	Individual/ Organization	Comment	CHA Response
77	Jeremy Bergstrom / Sargent Shriver Center	Section II, p. 22 – Units pending redevelopment/planning – Henry Horner Homes CHA has committed, and is now court-ordered, to replace 106 units – not 105 – of public housing through acquisition.	Thank you. The CHA will note the correction of the amount of units prior submittal.
78	Jeremy Bergstrom / Sargent Shriver Center	Section II, p. 22 – Units pending redevelopment/planning – Lathrop Homes We understand that CHA has committed to HUD to replace with hard units or site-based subsidies the 525 units lost as part of the Lathrop Homes RAD redevelopment. More broadly, CHA is obligated to provide the same number of hard units, with the same assortment of bedroom sizes, as were present at the start of the Plan For Transformation. See CHA's Amended and Restated Moving to Work Agreement at par. II(D). CHA must also comply with the same civil rights laws that govern its usual public housing operations, including the Fair Housing Act of 1968, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Titles II and III of the Americans with Disabilities Act, Executive Order 11063, and all of these laws and executive orders implementing regulations. HUD Notice PIH-2012-32 (HA), REV-2, § 1.2(E). The loss of 525 units of family public housing at Lathrop from one of the areas of highest opportunity and integration in the city is an unnecessary and unwarranted loss that directly conflicts CHA's civil rights obligations. Thus, the RAD conversion for Lathrop must ensure that all lost public housing units are replaced in racially integrated, low-poverty areas of the north side. It also is critical that a significant portion of that housing be replaced in the immediate neighborhood surrounding Lathrop, so as to preserve the rich, integrative community the CHA appears determined to destroy. Instead of redeveloping all 925 existing units of public housing at Lathrop, CHA's plan calls for the redevelopment of only 400 deeply subsidized units, while it adds 222 affordable units and 494 market rate units to an area already surrounded by expensive market rate housing with predominately white residents. The CHA has only proposed two developments as a source of	CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city. CHA is continuing to work with developers, Alderman and other partners to provide additional units.

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		replacement housing – 111 units at the former Presbyterian Homes buildings (including units at Crowder Place, Mulvey Place, and Devon Place) and 60 units at 6418 N. Sheridan Road. The 171 proposed replacement units include only studios, 1-bedroom, and 2-bedroom units, and thus will not serve as appropriate replacement housing for families. We are particularly concerned about CHA's plan to use Presbyterian Homes as replacement housing for units lost at Lathrop Homes. 78 of the 111 units at Presbyterian Homes will be designated as senior housing, and more than 63% are currently occupied. Since the Plan For Transformation commenced, the decline in CHA site-based family affordable housing has been dramatic. To use Presbyterian Homes as a source of replacement housing is in marked conflict with the CHA's duty to affirmatively further fair housing and comply with Title VI, given the likely adverse impact on racial minorities. It also is in likely conflict with CHA's commitment under the Moving To Work Agreement to replace the same number of bedroom sizes as were present at the start of the Plan For Transformation, which as we understand, was to maintain the CHA's supply of family housing. See CHA's Amended and Restated Moving to Work Agreement at par. II(D). Even if family household sizes have shrunk since the inception of the Plan For Transformation, it does not reduce the need for units designated as family housing. This type of hollow replacement cannot be permitted.	
79	Jeremy Bergstrom / Sargent Shriver Center	Section II, p. 23 – Additional Planned Capital Maintenance Activity in FY2017CHA should take care to ensure that all relocation rights of residents are respected, particularly in the case of relocations of LEP-persons, seniors and those with disabilities. CHA should treat legal requirements as the floor, not the ceiling, when it comes to language assistance (translation and interpretation), reasonable accommodations, and relocation assistance.	Thank you for your comment.
80	Jeremy Bergstrom / Sargent Shriver Center	Section II-B, p. 27 – Leasing Information CHA should use all available funds and resources to house the maximum number of eligible households possible, given the size of CHA's wait lists and the community's need for, and shortage of, affordable housing.	Thank you for your comment.

Comment #	Individual/ Organization	Comment	CHA Response
81	Jeremy Bergstrom / Sargent Shriver Center	<p>Section II-B, p. 28 – Description of Anticipated Issues Related to Leasing in FY2017</p> <p>CHA's screening criteria and eligibility requirements themselves serve unnecessarily as barriers to public housing leasing, such as CHA's policies regarding the admission of persons with certain criminal records; especially when CHA's policies are not consistent with HUD guidance. See HUD Office of General Counsel Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions, April 4, 2016. CHA's policies that allow it consider arrest records and pending criminal matters, e.g. Section II(G)(14)(d), (g), and (i) of CHA's ACOP, are in contradiction to HUD guidance. CHA, per the Landers v. CHA decision, should never use arrests as a basis to deny admission or terminate assistance.</p> <p>CHA's policies should also include reasonable lookback periods for records of convictions when their use is discretionary by federal law. We further encourage CHA to expand its implementation of the CHA-CCA reentry pilot, and to further adapt CHA's screening criteria in a way that provides fair housing opportunities to those in the community most vulnerable to poverty and homelessness, such as ex-offenders. Moreover, CHA's policies to exclude residents because of a history of their inability to pay for rent and utilities misses the point of public housing, which exists out of recognition that low-income applicants in Chicago are usually rent-burdened and unable to pay for safe, decent and sanitary shelter and utility costs for their families on their own.</p>	<p>The CHA thanks you for your comment. However, The Landers case did not prohibit the use of arrests in determining suitability of an applicant. In particular, the court agreed with CHA "that evidence of conviction is not a prerequisite for denying an application for public housing". The court further stated it did not dispute CHA's ability to reject an applicant based on a criminal record that includes convictions and arrests. Based on federal regulations the CHA is within policy. The HUD guidance reiterates this position that an arrest cannot be the sole reason for denying an applicant but does not prohibit its use in consideration of screening. All applicants who feel that a denial based on arrests and/or conviction documentation is unjust have an opportunity to mitigate the denial of tenancy. At this time, the CHA's Re-entry pilot program will not be adopted as CHA's policy on screening.</p>

Comment #	Individual/ Organization	Comment	CHA Response
82	Jeremy Bergstrom / Sargent Shriver Center	Section II-C, pp. 30-31 – Public Housing Site-Based Wait Lists ProposalWe are opposed to a move away from a community-wide wait list. CHA fails to explain how site-based wait lists will solve the problem of CHA’s failure to reach residents. The problems CHA describes are primarily the result of CHA’s failure to make available and lease up units in a timely way, leading to families stalling out on the wait list for many years, in some cases. CHA also fails to adequately account for homeless individuals, others who lack a permanent address, and persons who may have a temporarily disconnected phone number. CHA should make it easier for applicants to stay in contact with CHA, such as permitting notifications of new information online and/or by email. In our experience locally and in other communities, site-based wait lists usually increase the likelihood that residents may inadvertently fail to apply for all housing opportunities and/or that residents may fail to notify all wait lists of new contact information. We encourage tight controls over a central, community-wide wait list to improve the integrity and efficiency of the wait list process for both the CHA and applicants.	All CHA waitlist applicants may update their contact information by visiting CHA's corporate office, by contacting CHA by phone, or by submitting a request via mail. Additionally, in 2015 CHA provided applicants with the opportunity to update their contact information online.
83	Jeremy Bergstrom / Sargent Shriver Center	Section III, pp. 34-35 – Modified Family Self Sufficiency Program for HCV and Public Housing Participants (2014-01)We support CHA’s proposed FY2017 updates. As CHA implements its FY2014 plans to terminate FSS participation for participants who “are not engaged with the program,” we expect that CHA will only terminate participation as a last resort. Participants at risk of FSS program termination should be given notice and opportunity to come into compliance, and notice of termination that includes notification of a opportunity to grieve CHA’s decision.	This requirement has been in effect since 2015 and there have been no adverse consequences. Participants are well aware of their obligations. The modification proposed is to waive the 120 day recertification requirement.
84	Jeremy Bergstrom / Sargent Shriver Center	Section III, pp. 36-37 – Elimination of Assets in Income Calculation after Initial Eligibility for HCV Program (2017- 01) We support this proposal.	Thank you for your comment.

Comment #	Individual/ Organization	Comment	CHA Response
85	Jeremy Bergstrom / Sargent Shriver Center	<p>Section III, pp. 37-38 – Incentive Payments for Landlords in CHA Opportunity Areas (2017- 02)</p> <p>We support this proposal but do not believe it should be capped given CHA’s financial health, the severe lack of affordable housing in opportunity areas, the limited number of individuals historically able to participate in CHA’s mobility counseling programs so that more households can lease-up in opportunity areas, and the chronic source of income discrimination against voucher holders in Chicago. We are encouraged that CHA is committing to study ways to streamline its lease-up process. Minimally, CHA should identify ways to shorten the wait time for RTA inspections (initial and follow-up), cease its practice of charging landlords to schedule follow-up inspections, and strive to expand its mobility counseling program.</p> <p>CHA should engage in education of landlord and HCV participants around source of income discrimination and aggressively report landlords who discriminate against voucher holders. In recognition of the 51 day average time to lease up, CHA should support voucher holders who face delays in leasing up through no fault of their own by liberally granting extensions of their search time and offering additional support through mobility counseling, especially when attempting to utilize their voucher in an opportunity area.</p>	Thank you for your comment.

Comment #	Individual/ Organization	Comment	CHA Response
86	Jeremy Bergstrom / Sargent Shriver Center	Section III, pp. 38-40 – Time Limit Demonstration Program for Housing Choice Voucher Participants (2017- 03)We are strongly opposed to any time limit for HCV participants who are otherwise eligible. There is no rational connection between time limits and a family's growth of income and move into self-sufficiency. Instead, time limits on housing subsidies on families who are income-eligible punishes them for being poor and likely will lead to families who are increasing income and employment to crater once the voucher subsidy is lost. Housing subsidies can serve as a crucial stability marker for low-income households. Indeed, when looking to other public subsidy programs that have used time limits for benefits to low-income households, research shows no increase in financial independence and only a steep increase in poverty and related harms. Moreover, CHA's methodology of providing more intense social services but then time-limiting eligible families is faulty. If intensified social services such as CHA's Family Self-Sufficiency Program and case management services through CHA's FamilyWorks do not lead to a family's ability to afford housing without a voucher, termination of the voucher is not the answer and is counterintuitive. A demonstration to study more acute social services and to encourage family self-sufficiency is laudable, but when CHA's own programs have failed despite a family's participation, the outcome should not be to terminate assistance.	Thank you for your comment, CHA would like to clarify a couple of points. a) The time line of 8 years was based on the average number of years that a household participates in the HCV program. b) The selection process for the 100 families would be from the lower 50% of the wait list as an incentive to participate. Families would opt in, not be cherry picked nor have a requirement to participate. c) The 100 families would be from 2 distinct groups: 50 families who are at 51-80% of the AMI who would be enrolled in FamilyWorks program, and the second 50% who are at 0-50% of AMI and enrolled in the FSS program. d) No one will be removed from voucher assistance at the end of the demonstration, rather people will either be able to transition off or they will remain to receive a frozen HAP amount based on the amount received at the end of the program. e) The purpose of the demonstration is to see if level of AMI at entrance makes a difference in how long assistance is needed, when supports are provided. CHA will also look at similarly situated households who would not be receiving services, but who are from the same income categories for comparison.
87	Jeremy Bergstrom / Sargent Shriver Center	Section III, pp. 40-41 – Funding for City of Chicago Housing Assistance Programs (2017-04)While we support the goals of this proposed demonstration, especially the dedication of resources to the at-risk individual described, its description here lacks sufficient detail. We are concerned about the diversion of funds away from permanent public housing and/or federally subsidized housing programs with deep subsidies which carry the safeguards of federal regulations and HUD oversight, without the requirement of participation in supportive services. If this demonstration is implemented, CHA should additionally target LGBTQ individuals, especially LGBTQ transitional age youth.	Thank you for your comment.

Comment #	Individual/ Organization	Comment	CHA Response
88	Jeremy Bergstrom / Sargent Shriver Center	Section III, pp. 41-43 – Funding Supportive Services for Sponsor-Based Voucher Program (2016-02) We support CHA's FY2017 proposal to pay security deposits. When selecting sponsors, we assume CHA will follow its procurement process to ensure the highest quality of services possible. While we do not discourage the provision of supportive services to voucher households who want them, we encourage CHA to strike an appropriate balance when it comes to utilization of voucher funding so that as many eligible families as possible might be assisted. It is significant that CHA's estimated cost of \$4500 per family is nearly half the average HCV subsidy paid per household in 2015.	Thank you for your comment.
89	Jeremy Bergstrom / Sargent Shriver Center	Section IV, p. 36 – Revitalization of 25,000 Units (2000-01) A substantial number of units that CHA suggests it will bring online in FY16 – one-third of the 766 planned units – are proposed to come from preservation of Mod Rehab conversions. See our response regarding CHA's summary at Section II, p. 19. CHA should focus its unit delivery on actual net additions to its housing stock. CHA should not count Project Based Voucher units towards its unit delivery count if those units are not available to families with a right to return (so-called “10/1/99 families”).	Thank you for your comment.
90	Jeremy Bergstrom / Sargent Shriver Center	Section IV, p. 50 - \$75 Minimum Rent for Public Housing and HCV (2009-01) Once again, CHA should lower the minimum rent to \$50. CHA's elevated minimum rent was never approved through CHA's MTW plan process. More importantly, CHA's elevated minimum rent is unnecessarily punitive of very-low income families, especially in light of CHA's financial health, capital and reserves. The CHA has also failed to abide by the hardship exemption and should modify its policies and practices to come into compliance in that regard. Families regularly report property managers instructing them to do “whatever it takes” to pay the minimum rent, rather than proactively making available the hardship exemption.	The CHA has no plans at this time to change its current minimum rent policy. The policy is consistent with HUD approval and the implementation of the hardship exemption is in compliance with HUD regulation language, guidance and policy.

Comment #	Individual/ Organization	Comment	CHA Response
91	Jeremy Bergstrom / Sargent Shriver Center	Section IV, p. 56 – Mobility Counseling Demonstration Program Work Requirement (2016-01)The Mobility Counseling Demonstration Program’s focus on households with school age children is laudable. However, adding a work requirement to the Mobility Counseling Demonstration Program (MCD) will only serve as a disincentive to people considering participating in this important program and complicate the administration of the program. The MCD program is designed to encourage residents to move to areas of greater integration and less segregation and to hopefully measure the benefits this type of counseling has on families with school age children and their educational outcomes. The CHA should be doing all it can to encourage, and not discourage, participation. Access to better employment opportunities is a likely advantage of moving to an opportunity area which should be available to those who are not already working. Voucher eligible households, if employed, are predominately low-wage workers who have less flexibility when it comes receiving job transfers, new work schedules, etc., Thus, CHA’s priority should be first on moving families to areas of opportunity and then supporting, through post-move counseling, their access to employment in their new community. CHA’s addition of a work requirement as a requirement of participation in MCD is unwise and simply punitive. An already low-income household should not face a loss of housing because it has suffered a loss of work. CHA should abandon outdated, scientifically unsupported, and unsuccessful policies that tie housing to a work requirement.	Thank you for your comment. After implementation, CHA will evaluate whether there has been any negative impact on participation in the Mobility Counseling Demonstration Program, due to the work requirement.
92	Jeremy Bergstrom / Sargent Shriver Center	Section IV, pp. 65-66 – Office of the Ombudsman (2008-01) CHA’s MTW waiver of the requirements to permit mixed-income public housing residents to organize and be represented through a Local Advisory Council (LAC) is a disservice to CHA’s mixed-income residents. The Office of the Ombudsman does not serve the same practical or regulatory purposes as LACs. CHA’s waiver serves no legitimate MTW goal and instead results in public housing residents having less opportunity to participate in their community than others in their community. CHA should end this punitive practice and restore funding and support to LACs at mixed-income developments. Moreover, upon creation of mixed-income developments through a RAD conversion, those communities of RAD residents are entitled to participation rights as outlined in HUD’s RAD notice. Those provisions cannot be waived through MTW, and so CHA must not rely on this MTW waiver vis-à-vis those RAD communities.	The Ombudsman is to recognize spokespersons for mixed-finance resident groups as permitted under the MTW Agreement.

Comment #	Individual/ Organization	Comment	CHA Response
93	Jeremy Bergstrom / Sargent Shriver Center	Section IV pp. 66-67 – Exception Payment Standards CHA's 2014 lowering of the payment standard to 150% of HUD FMR discourages families from moving into opportunity areas where rents have only been increasing. This action should be coupled with: (1) Fast turnaround of reasonable accommodation requests granted for rents above 150% of the FMR; (2) higher exception rents in "high opportunity" neighborhoods where 150% of the FMR will not compete with market rents in those areas. The CHA could propose to pay up to 200% of the FMR in certain high opportunity neighborhoods to assist families live in neighborhoods with high quality schools, for example; (3) increased commitment to housing mobility counseling, holding payments for units in high opportunity neighborhoods, rapid inspection programs for high opportunity units, and other program improvements to increase participation by landlords with units in high opportunity neighborhoods. As part of this, CHA needs to re-evaluate its rent reasonableness program, which fails to accurately reflect true market rents at the neighborhood level, because the data is combining too many neighborhoods and then proposing an artificially low reasonable rent. See also our comments regarding CHA's proposed exception payments, Section III, pp. 66-67.	Thank you for your comment. CHA's rent reasonableness process does not use comparables that exceed a one mile radius of the subject unit. In the rare cases where no similar comparables are available within a mile, CHA expands the radius to 1.5 miles. Owners also have the ability to submit their comparables that can be used to when determining rent reasonableness.
94	Jeremy Bergstrom / Sargent Shriver Center	Section IV, p. 70 – PBV Contract Commitments with 16 - 30 Year Initial Terms (2011-05) While we support CHA permitting an initial 16-30 year PVB HAP contract, CHA should also permit extensions up to the 30-year maximum currently provided by PVB regulations. See 24 C.F.R. 983.205. While some are concerned these long term preservation mandates undercut development, in our experience with HUD multifamily housing we have found that HUD's similar mandate via various preservation programs has in no way undercut development or preservation. As well, under CHA's MTWA agreement with HUD, implicit within that mandate to replace 25,000 lost hard units with the same mix of bedroom sizes is the obligation to maintain the same level of long term affordability.	Thank you for your comment.
95	Jeremy Bergstrom / Sargent Shriver Center	Section IV, p. 72 – Expansion of Public Housing Earned Income Disallowance Policy to CHA RAD Properties (2016-03) We support this proposal and laud CHA for implementing an EID for all eligible RAD residents.	Thank you for your comment.

Comment #	Individual/ Organization	Comment	CHA Response
96	Jeremy Bergstrom / Sargent Shriver Center	Additional Comment CHA should amend its FY17 MTW Plan to ensure that Section 8 funding of RAD properties is subject to Section 3 rules at 24 C.F.R. § 135.3, minimally. CHA should increase the scope of Section 3 and ensure that those principals apply at RAD properties in order to increase job opportunities for CHA's residents.	Thank you for your comment.
97	Julie Elena Brown / BPI	BPI submits the following initial comments on the Draft FY2017 Moving to Work Annual Plan. Additional issues involving compliance with Gautreaux court orders may also need to be addressed.  BPI supports CHA's intention (p. 37) to expand the number of landlords in opportunity areas who wish to participate in the HCV program by providing incentive payments. We urge CHA to continue to explore ways to make the HCV program easier to access and more attractive to landlords with well-maintained buildings in Gautreaux General and opportunity areas.	Thank you for your comment.
98	Julie Elena Brown / BPI	In the discussion of expected mixed income development on the former site of Ickes homes (p. 24), the draft plan says that there will be a minimum of 200 CHA units. It is our understanding that CHA has committed to additional CHA units. If that is the case, the number should be adjusted.	There will be 244 CHA units of the proposed 877 units at the former Harold Ickes Redevelopment Site. The unit mix is 53% Market Rate; 19% Affordable; 28% CHA.
99	Julie Elena Brown / BPI	CHA states that it has selected a development team for 60 units of CHA housing at 6418 N. Sheridan (p. 24), to be part of a mixed use development that may include up to 120 units of housing. The draft plan does not say whether the housing is to be for families or seniors.  While we applaud CHA's continued efforts to locate family public housing in Gautreaux General Areas, the proposal raises questions with respect to Gautreaux orders limiting concentration of public housing and on housing families with children above the third floor.	Thank you for your comment.
100	Julie Elena Brown / BPI	The draft plan (p. 23) mentions the conversion of Pope Elementary School into CHA office space and housing. It does not specify whether it intends CHA family units for the site. If that is the intention CHA would have to provide matching family units in Gautreaux General Areas before providing the housing units, as Pope is located in a Gautreaux Limited Area (North Lawndale).	CHA is developing its plan for the redevelopment of Pope Elementary School and CHA will comply with Gautreaux requirements, if applicable.

Comment #	Individual/ Organization	Comment	CHA Response
101	Julie Elena Brown / BPI	We are concerned that CHA only projects acquisition of 5 units under its Expedited Acquisition process under REAP. We urge CHA to continue to explore ways to reduce the barriers to acquisitions through the REAP program.	Thank you for your comment.
102	Julie Elena Brown / BPI	6. CHA proposes to transition its traditional family developments to site-based waiting lists (p.30). Doing so would violate existing Gautreaux court orders.	Thank you for your comment. In order for the CHA to consider any changes to current policies involving waitlists, the CHA must include such information in its MTW Annual Plan for HUD approval. Prior to any implementation of change to its current waitlists, the CHA will consult and complete its legal and procedural requirements including any discussion and changes needed with parties affected.
103	Juan Carlos Linares / LUCHA	On behalf of the LUCHA, I am writing to urge the Chicago Housing Authority to remove 111 inappropriate units from consideration as family public housing replacement units on Chicago's North and Northwest sides. In February, CHA judiciously committed to replace the 525 public housing units that will be eliminated at the Lathrop Homes by "producing 525 new housing opportunities in general and opportunity areas in the north side of the city." However CHA's Draft Annual Plan lists 81 units that, from our perspective, is not appropriate nor accurate units to count as Lathrop replacement units, and another 30 units that are inappropriate. (The units are listed in the CHA's RAD conversion table, on pages 104 and 105.) First, Mulvey Place and Crowder Place – with a combined total of 78 units – are existing senior buildings, while the Lathrop Homes has always been family housing. Chicago's North and Northwest sides have a significant number of CHA senior buildings, but need much more low-income family housing. Mulvey Place and Crowder Place have long provided affordable senior housing Residents, community leaders and elected officials united to save these buildings as senior	CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city. CHA is continuing to work with developers, Alderman and other partners to provide additional units.

Comment #	Individual/ Organization	Comment	CHA Response
		<p>housing. CHA is to be commended for purchasing these buildings, along with Devon Place, early in 2016. Second, most of the units in the Mulvey and Crowder buildings are already occupied; none of them represent new housing opportunities nor suffice to offset the potential loss of 525 public housing units at the Lathrop Homes. Third, three units at Devon Place are studio apartments (so are a total of 21 units in the Mulvey and Crowder buildings). Studios cannot replace Lathrop Homes apartments, which are one, two or three-bedroom homes. They must be replaced with no loss of bedrooms. Finally, while not designated as senior housing, Devon Place includes 30 more existing affordable units, most of them already occupied. Replacing the 525 Lathrop units is a vital opportunity for the CHA to move toward meeting the Fair Housing Act's mandate to "affirmatively further fair housing" in an economically thriving, but increasingly exclusive, part of a segregated city. The 111 units listed in the draft Annual Plan do not meet that standard. Please remove the Mulvey Place, Crowder Place and Devon Place units from the list of Lathrop Homes RAD transfer (replacement) units.</p>	
104	Katie Bringman Baxter / St. Luke's Lutheran Church of Logan Square	<p>On behalf of St. Luke's Lutheran Church of Logan Square, I am writing to urge the Chicago Housing Authority to remove 111 inappropriate units from consideration as family public housing replacement units on Chicago's North and Northwest sides. St. Luke's Lutheran Church of Logan Square has advocated for affordable housing in our neighborhood for years. We are keenly aware that gentrification has forced many long time residents out of the neighborhood, and we believe it is part of our Christian calling to ensure that our communities continue to be inclusive and accessible to all. In February, CHA wisely committed to replace the 525 public housing units that will be eliminated at the Lathrop Homes by "producing 525 new housing opportunities in general and opportunity areas in the north side of the city." But CHA's Draft Annual Plan lists 81 units that are utterly bogus as Lathrop replacement units, and another 30 units that are inappropriate. (The units are listed in</p>	<p>CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city. CHA is continuing to work with developers, Alderman and other partners to provide additional units.</p>

Comment #	Individual/ Organization	Comment	CHA Response
		<p>the CHA's RAD conversion table, on pages 104 and 105.)First, Mulvey Place and Crowder Place – with a combined total of 78 units – are existing senior buildings, while the Lathrop Homes has always been family housing. Chicago's North and Northwest sides have a significant number of CHA senior buildings, but need much more low-income family housing.Mulvey Place and Crowder Place have long provided affordable senior housing. Residents, community leaders and elected officials united to save these buildings as senior housing. CHA is to be commended for purchasing these buildings, along with Devon Place, early in 2016. But that's no excuse for mixing apples and oranges.Second, most of the units in the Mulvey and Crowder buildings are already occupied; none of them represent new housing opportunities!Third, three units at Devon Place are studio apartments (so are a total of 21 units in the Mulvey and Crowder buildings). Studios cannot replace Lathrop Homes apartments, which are one, two or three- bedroom homes. They must be replaced with no loss of bedrooms.Finally, while not designated as senior housing, Devon Place includes 30 more existing affordable units, most of them already occupied.Replacing the 525 Lathrop units is a vital opportunity for the CHA to move toward meeting the Fair Housing Act's mandate to "affirmatively further fair housing" in an economically thriving, but increasingly exclusive, part of a segregated city. The 111 units listed in the draft Annual Plan do not meet that standard.Please remove the Mulvey Place, Crowder Place and Devon Place units from the list of Lathrop Homes RAD transfer (replacement) units. Thank you.</p>	

Comment #	Individual/ Organization	Comment	CHA Response
105	Sol Flores / La Casa Norte	<p>On behalf of La Casa Norte, and children and families experiencing homelessness in Chicago, I urge the Chicago Housing Authority to remove 111 inappropriate units from consideration as family public housing replacement units on Chicago's North and Northwest sides. La Casa Norte's mission is to serve youth and families confronting homelessness. We provide access to stable housing and deliver comprehensive services that act as a catalyst to transform lives and communities. Many of the families we serve experience homelessness because of the scarcity of affordable housing in our neighborhoods. The redevelopment of Lathrop Homes eliminates 525 public housing units from our community. In February, the CHA committed to replace every one of those units by "producing 525 new housing opportunities in general and opportunity areas in the north side of the city." However, CHA's Draft Annual Plan lists 111 units that are inappropriate replacements for those lost in the Lathrop redevelopment. (The units are listed in the CHA's RAD conversion table, on pages 104 and 105.) The first 78 of these units are in Mulvey Place and Crowder Place, existing senior buildings. The others are at Devon Place. These units cannot replace those in Lathrop Homes because:</p> <ul style="list-style-type: none"> <li>a) Mulvey and Crowder are senior buildings, while Lathrop's units have always been family housing. Chicago's North and Northwest sides have a significant number of CHA senior buildings, but need more low-income family housing.</li> <li>b) Most of the units in the Mulvey and Crowder buildings are already occupied; none of them represent new housing opportunities!</li> <li>c) Three units at Devon Place are studio apartments (so are a total of 21 units in the Mulvey and Crowder buildings). Studios cannot replace Lathrop Homes apartments, which are one, two or three-bedroom homes. They must be replaced with no loss of bedrooms.</li> <li>d) Devon Place includes 30 more existing affordable units, most of them already occupied. Replacing the 525 Lathrop units is an opportunity for the CHA to realize the Fair Housing Act's mandate to "affirmatively further fair housing" in a thriving, increasingly exclusive part of a segregated city. The 111 units listed in the draft Annual Plan do not meet that standard.</li> </ul>	CHA remains committed to producing 525 new housing opportunities in general/opportunity areas on the north side of the city. CHA is continuing to work with developers, Alderman and other partners to provide additional units.

Comment #	Individual/ Organization	Comment	CHA Response
106	Tamiko Holt	I have always had a concern for these families that's living with the mobility vouchers that the payment standard changed on, and they had the choice of pretty much staying in the unit if they get paid the overages. I pretty much, I know a couple families, and the fact that you know peoples personal business and know they are not eating well because they're scrapping to pay that money because them standards was changed on them, but they couldn't really afford to move? I thought that CHA was supposed to make sure that families was able, that the income was able to handle it, then allowing them to stay. You understand what I'm saying? I mean, why even do people like that? And they're telling them okay yeah, now you got to move or you're going to pay this or you have to pay this. Well then, you should have pony'd up the security deposit and moving truck money to move because you should not have put them in that \$300 markup situation knowing dog gone well that hey, what's going to happen if we have -- if we are not able to sustain these rents for them.	When CHA changed its Exception Payment Standard policy, all participants impacted were given at least one year notice and in most cases, two years prior to the change in payment standard. In addition, families are mailed reminder letters of their transition date annually. CHA will not pay for moves.
107	Francine Washington	They should have paid for their moves.	When CHA changed its Exception Payment Standard policy, all participants impacted were given at least one year notice and in most cases, two years prior to the change in payment standard. In addition, families are mailed reminder letters of their transition date annually. CHA will not pay for moves.
108	Francine Washington	My second question is, we have all these mixed-income, and I say this over and over again, big deal, all this work. They don't take girls that work in the mayor's off first. This is not new to us to. Some of us have been around for years. And we have all -- we have condo associations, we have the homeowners association, we have nobody representing the residents. I represent myself, they represent should get, what they should and should not do. Why don't we decide our fate? We said we pay the same assessment fees, and They're reneging on this money and fees. They are lying on the association fees they get from CHA. A lot of this isn't being maintained the way it should be. A lot of their residents, the grounds are not being maintained the way it should be. They only collect money from CHA. They do their association fees, take care of property -- we of the contract -- the lease, developer, but it still belongs to CHA. Why can't the residents get -- be on that board? Why can't they have their association? I want to go ask them to be part of the homeowners and be part of the residents, be part of the homeowners association board.	Condominium association bylaws vary from property to property but generally only owners can be members of the association board. CHA staff and its management agents attend and represent public housing interests at condominium association board meetings.

***Public Comment Info and Grid- FY2017 MTW Annual Plan Amendment***

Prior to submission of the Amended FY2017 MTW Annual Plan for CHA Board approval, a 30-day public comment period was conducted from May 24 through June 23, 2017. CHA held two public comment hearings during the comment period: June 1 (Charles Hayes Family Investment Center, 4859 S. Wabash) and June 5 at CHA Headquarters, 60 E. Van Buren with a total of three attendees. The following table includes public comments and CHA responses.

Proposed FY2017MTW Annual Plan Amendment Public Comment Period: May 24 - June 23, 2017			
Comment #	Individual/ Organization	Comment	CHA Response
1	Elbert Tavon Briggs, purpletavon@gmail.com	I reviewed Proposed FY2017 Annual Plan Amendment and re-read the CHA Approved FY2017 MTW Annual Plan - Approved 2/1/2017. Upon reading the Proposed Amendment and the Approved Annual Plan, I have not found any construction/upgrades/repairs scheduled for the Kenmore Senior Apartments. Are there any construction/upgrades/repair projects scheduled for the Kenmore Senior Apartments in FY2017? Additionally, in reviewing Proposed FY2017 Annual Plan Amendment & FY2017 MTW Annual Plan - Approved 2/1/2017, I did not see the Kenmore Senior Apartments identified as a RAD Property. Will the Kenmore Senior Apartments become a RAD Property in FY2018?	Kenmore Senior Apartments is no longer included in the 10,937 public housing units that CHA is transitioning to project-based vouchers under RAD.
2	Denise Taylor, 5040 N Kenmore	I was basically here -- I don't see my building listed. But I was coming to find out more information regarding the Rental Assistance Demonstration Program because in our building meetings our Building Manager did mention that there was going to be some changes regarding that program. I want to get a little more information on what that was and what that was going to consist of. Would they send someone to attend one of the meetings? Our resident coordinator could schedule that for our next meeting.	Kenmore Senior Apartments is no longer included in the 10,937 public housing units that CHA is transitioning to project-based vouchers under RAD.
3	Barbara Burns, CPA Former Lathrop Resident 525 Task Force/Lathrop Leadership Team/LSNA 5647 N. Clark St #303, 60660	As a former CHA resident who grew up at Lathrop Homes and a member of the 525 Task Force initiated by the Logan Square Neighborhood Association which is committed to replacing the 525 family units being lost on site, I have several comments and concerns regarding the Lathrop Homes replacement units in the appendices: The Lathrop Homes replacement units listed at "various addresses TBD on north side of Chicago in Gautreaux General Areas" of 173 units with no breakdown of locations, no number of bedrooms or	CHA continues to move forward in facilitating 525 new housing opportunities in General and Opportunity Areas on the North Side, and is committed to working with developers, Alderman and other partners to identify and provide additional units.

		whether they are family or senior units is especially vague. As I add up the Lathrop Home replacement “family” units, that have more information, I see that the breakdown of bedrooms is: 3 - 0 bedrooms; 180 - 1 bedrooms; 51 - 2 bedrooms	
4	Barbara Burns, CPA Former Lathrop Resident 525 Task Force/Lathrop Leadership Team/LSNA 5647 N. Clark St #303, 60660	It is my understanding that 0 bedrooms do not meet the definition of “family” units. I do not remember there being any 0 bedroom units at Lathrop Homes. There are no 3-4 bedroom units listed as Lathrop Homes replacement units so this lack of larger units is also not representative of the units lost at Lathrop. I also question the majority of units being 1 bedrooms. This also is not representative of the units being lost at Lathrop Homes.	Although considered a family development, Lathrop Homes was unique in that over 90% of the original units were 1 and 2 bedroom units. Due to the historic nature of the Lathrop Homes site, a substantial number of existing buildings will be retained and rehabilitated, maintaining the historic integrity of the site and subsequently a large portion of the original bedroom sizes.
5	Barbara Burns, CPA Former Lathrop Resident 525 Task Force/Lathrop Leadership Team/LSNA 5647 N. Clark St #303, 60660	I am also concerned that under RAD or project-based vouchers that the Lathrop Home replacement units will not remain low-income public housing units in the future.	RAD project-based vouchers that result from Lathrop Transfers of Assistance will be covered by a 20-year HAP that preserves their long-term availability as HUD-assisted housing. The federal statute establishing RAD requires the agency administering the RAD HAP contract to offer, and the owner of the project to accept, the renewal of the initial and each renewal RAD HAP contract, subject to the availability of appropriations. In the event that the HAP Contract is terminated, the recorded RAD Use Agreement will continue preserve long-term affordability at all RAD properties unless otherwise approved by HUD. The RAD Use Agreement requires that new tenants of all units previously covered under the HAP contract have (at time of move-in) incomes at or below 80% AMI, and for rents to not exceed 30% of 80% of median income for an appropriate-sized unit.
6	Barbara Burns, CPA Former Lathrop Resident 525 Task Force/Lathrop Leadership Team/LSNA 5647 N. Clark St #303, 60660	As for the senior units, if these units are already senior subsidized housing, counting them as senior units is not adding any housing to the available stock. This is true of any units – senior or family.	The senior housing units listed as proposed RAD Transfer of Assistance properties are new CHA Development projects, not currently senior subsidized housing. These Transfer of Assistance properties are distinct from the ongoing RAD conversion of CHA's Senior-Designated Housing Buildings.

***Description of Planned or Ongoing PHA-Directed Evaluations of the Demonstration***

CHA is not currently engaged in any agency-directed evaluations of its MTW Demonstration Program.

**Annual Statement/Performance and Evaluation Report for MTW and Non-MTW Capital Fund Grants**  
**2012 Capital Grants**

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 II: Summary		PIA Name:		Grant Type and Number		FY of Grant:	
CHICAGO HOUSING AUTHORITY		Capital Fund Program Grant No: HUD-P020112		Replacement Housing Factor Grant No		2013	
		Date of CFP: 07/28/12				FY of Grant Approval: 2012	
Type of Grant:		<input checked="" type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Reserve for Disasters/Emergencies		<input type="checkbox"/> Revised Annual Statement (revision no: )	
Performance and Evaluation Report for Period Ending:				<input type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Original	Total Estimated Cost	Revised <sup>2</sup>	Obligated	Total Actual Cost <sup>1</sup>	Expended
1	Total non-CFP Funds						
2	1406 Operations (may not exceed 30% of line 21) <sup>2</sup>						
3	1408 Management Improvements						
4	1410 Administration (may not exceed 10% of line 21)						
5	1411 Audit						
6	1415 Landlord Damages						
7	1430 Fees and Costs						
8	1440 Site Acquisition						
9	1450 Site Improvement						
10	1460 Dwelling Structures						
11	1465 Living Equipment—Nonseparable						
12	1475 Non-dwelling Structures						
13	1485 Demolition						
14	1492 Moving to Work Demonstration						
15	1495 Living Equipment						
16	1499 Living Equipment						
17	1501 Construction Activities <sup>1</sup>						
18a	3000 Construction or Debt Service paid by the PIA						
18b	Payment QP <sup>1</sup>						
19	1502 Contingency (may not exceed 5% of line 20)	17,387					
20	Amount of Annual Grant (sum of lines 2-19)	546,733.895					
21	Amount of line 20 Related to LMF 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						

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report on a Revised Annual Statement.  
 PIA's with under 250 units in management may use 100% of CFP Grants for operations.  
 RHP funds shall be included here.

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

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<sup>1</sup> To be completed for the Performance and Evaluation Report of a Revised Annual Statement  
<sup>2</sup> To be completed for the Performance and Evaluation Report.

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PHA Name:  
CHICAGO HOUSING AUTHORITY

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Obligation and expenditure are dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

PHA Name:  
CHICAGO HOUSING AUTHORITY

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form HUD-50075.1 (4/2008)

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		FFY of Grant:	
CHICAGO HOUSING AUTHORITY		Capital Fund Program Grant No. _____ Date of CFPP: 3/12/2012		2013 FFY of Grant Approval: 2012	
Type of Grant: <input checked="" 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		Original	Total Estimated Cost	Revised <sup>1</sup>	Total Actual Cost <sup>1</sup>
1	Total non-CFPP Funds				Expended
2	1406 Operations (may not exceed 20% of line 21) <sup>1</sup>				
3	1408 Management/Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1413 Landed Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Structures—Non-spendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1483 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities <sup>2</sup>				
18a	1501 Collaboration or Debt Service paid by the PIAs				
18b	9006 Collaboration 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) <sup>3</sup>	\$12,416,998			
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 – 508 Costs				
24	Amount of line 20 Related to Security – Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

<sup>1</sup> To be completed for the Performance and Evaluation Report.

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

<sup>3</sup> PIAs with under 250 units in management may use 10% of CFPP Grants for operations.

<sup>4</sup> KID 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

<b>Part I: Summary</b>	
PHA Name: <b>CHICAGO HOUSING AUTHORITY</b>	Grant Type and Number Capital Fund Program Grant No. _____ Date of CFP: 3/12/2012
Replacement Housing Factor Grant No. 1106R00250	
FY of Grant: 2013 FY of Grant Approval: 2012	
Type of Grant <input checked="" 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 type="checkbox"/> Final Performance and Evaluation Report
Line Summary by Development Account	Original Total Estimated Cost Revised Total Actual Cost <sup>1</sup>
Signature of Executive Director	Signature of Public Housing Director
Date	Date

[illegible]

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>2</sup> To be completed for the Performance and Evaluation Report.

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PHA Name:  
CHICAGO HOUSING AUTHORITY

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Form HUD-50075.1 (4/2008)

PHA Name:  
CHICAGO HOUSING AUTHORITY

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Form HUD-50075.1 (4/2008)

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

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

<b>Part I: Summary</b>		<b>PIHA Name:</b> CHICAGO HOUSING AUTHORITY		<b>Grant Type and Number:</b> Capital Fund Program Grant No.: Date of CFPP: 3/12/2012		<b>Replacement Housing Factor Grant No.:</b> L06R002502		<b>FY of Grant:</b> 2013 FY of Grant Approval: 2012	
<b>Type of Grant:</b> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Reserve for Disaster/Emergencies		<input type="checkbox"/> Revised Annual Statement (revision no. )		<input type="checkbox"/> Final Performance and Evaluation Report			
<b>Line</b>	<b>Summary by Development Account</b>	<b>Original</b>	<b>Total Estimated Cost</b>	<b>Revised</b>	<b>Obligated</b>	<b>Total Actual Cost<sup>1</sup></b>	<b>Expended</b>		
1	Total non-CFP funds								
2	1406 Operations (may not exceed 30% of line 21) <sup>2</sup>								
3	1408 Management Improvements								
4	1410 Administration (may not exceed 10% of line 21)								
5	1411 Audit								
6	1413 Unavoided Damages								
7	1430 Fees and Costs								
8	1440 Site Acquisition								
9	1450 Site Improvement								
10	1460 Dwelling Structures								
11	1465 I Dwelling Equipment—Nonexpendable								
12	1470 Non-dwelling Structures								
13	1475 Non-dwelling Equipment								
14	1483 Demolition								
15	1492 Moving to Work Demonstration								
16	1495 J Relocation Costs								
17	1499 Development Activities <sup>3</sup>								
18a	1501 Collateralization or Debt Service paid by the PIHA								
18b	5000 Collateralization or Debt Service paid Via System of Direct Payment								
19	1502 Contingency (may not exceed 5% of line 23)								
20	Amount of Annual Grant: (sum of lines 2 - 19)		\$23,555,208						
21	Amount of line 20 Related to LRP 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								

<sup>1</sup> To be completed for the Performance and Evaluation Report.

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

<sup>3</sup> PIHAs with under 250 units in management may use 100% of CFP Grants for operations.

<sup>4</sup> MHF 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

<b>Part I: Summary</b>	
PIA Name: <b>CHICAGO HOUSING AUTHORITY</b>	Grant Type and Number Capital Fund Program Grant No. _____ Date of CFFP: 3/12/2012
Replacement Housing Factor Grant No: IL06R002502	
FY of Grant: 2013 FY of Grant Approval: 2012	
Type of Grant <input checked="" 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 type="checkbox"/> Final Performance and Evaluation Report
Line	Summary by Development Account
Original	Total Estimated Cost
Revised	Revised
Signature of Executive Director	Signature of Public Housing Director
Date	Obligated
	Total Actual Cost
	Expenditure

[illegible]

Form HUD-50075.1 (4/2008)

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Form HUD-50075.1 (4/2008)



PHA Name:  
CHICAGO HOUSING AUTHORITY

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Form HUD-50075.1 (4/2008)

2013 Capital Grants

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

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

Part I: Summary		Grant Type and Number Capital Fund Program Grant No. IL08P00250113 (Date of CFFP: 9/9/2013)		Replacement Housing Factor Grant No.:		FFY of Grant: 2014 FFY of Grant Approval: 2013	
PIA Name: CHICAGO HOUSING AUTHORITY		Type of Grant: <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: Summary by Development Account		<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Final Performance and Evaluation Report		Revised Annual Statement (revision no. )	
Line	Summary by Development Account	Original	Revised <sup>1</sup>	Obligated	Total Actual Cost <sup>1</sup>		
1	Total non-CFFP Funds						
2	1406 Operations (may not exceed 20% of line 21) <sup>2</sup>						
3	1408 Management Improvements						
4	1410 Administration (may not exceed 10% of line 21)						
5	1411 Audit						
6	1415 Liquidated Damages						
7	1430 Fees and Costs						
8	1440 Site Acquisition						
9	1450 Site Improvement						
10	1460 Dwelling Structures						
11	1465.1 Dwelling Equipment - 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 <sup>1</sup>						
18a	1501 Collateralization or Debt Service paid by the PIA						
18b	9881 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)						
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						

To be completed for the Performance and Evaluation Report:  
To be completed for the Performance and Evaluation Report or a Revised Annual Statement:  
PIAs with under 250 units in management may use 100% of CFFP Grants for operations.  
<sup>1</sup> (LBP) 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

<b>Part I: Summary</b>	
<b>PIEA Name:</b> CHICAGO HOUSING AUTHORITY	<b>Grant Type and Number:</b> Capital Fund Program Grant No. IL08P00250112 Date of CFP: 9/9/2013 <b>Replacement Housing Factor Grant No.</b>
<b>Type of Grant:</b> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:	<b>FY of Grant:</b> 2014 <b>FY of Grant Approval:</b> 2013
<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report	
<b>Line Summary by Document Account</b>	<b>Total Estimated Cost</b>
<b>Signature of Executive Director</b> <i>[Signature]</i> Public Housing Director	<b>Original</b> Date: 7-4-2013 <b>Revised</b> Date: 8/24/13 <b>Obligated</b> Date: <i>[blank]</i> <b>Expended</b> Date: <i>[blank]</i>

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>2</sup> To be completed for the Performance and Evaluation Report.



[illegible]

Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9) of the U.S. Housing Act of 1937, as amended.

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

[illegible]

(b) Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

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

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

<b>Part I: Summary</b>		<b>PIHA Name:</b> CHICAGO HOUSING AUTHORITY		<b>Grant Type and Number:</b> Capital Fund Program Grant No. 9/8/2013		<b>Replacement Housing Factor Grant No. IL08R002501</b>		<b>FY of Grant:</b> 2014		<b>FY of Grant Approval:</b> 2013	
<input checked="" 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 type="checkbox"/> Final Performance and Evaluation Report											
<b>Type of Grant</b>		<b>Summary by Development Amount</b>		<b>Total Estimated Cost</b>		<b>Revised<sup>1</sup></b>		<b>Obligated</b>		<b>Total Actual Cost<sup>1</sup></b>	
				<b>Original</b>							
1	Total non-FY Funds										
2	1406 Operations (may not exceed 20% of line 21) <sup>1</sup>										
3	1408 Management Improvements										
4	1410 Administration (may not exceed 10% of line 21)										
5	1411 Audit										
6	1415 Liquidated Damages										
7	1430 Fees and Costs										
8	1440 Site Acquisition										
9	1450 Site Improvement										
10	1460 Dwelling Structures										
11	1465 Dwelling Equipment - Nonextendable										
12	1470 Non-dwelling Structures										
13	1475 Non-dwelling Equipment										
14	1485 Demolition										
15	1492 Moving or Work Demonstration										
16	1495 Relocation Costs										
17	1499 Development Activities <sup>1</sup>										
18a	1501 Collateralization or Debt Service paid by the PIHA										
18b	9000 Collateralization or Debt Service paid Via System of Direct Payment										
19	1502 Contingency (may not exceed 5% of line 20)										
20	Amount of Annual Grant: (sum of lines 2-19)										
21	Amount of line 20 Related to BP 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										

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report on a Revised Annual Statement.  
<sup>3</sup> PIHAs with under 250 units in management may use 100% of CIP Grants for operations.  
<sup>4</sup> RIF 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

<b>Part I: Summary</b>	
<b>PIA Name:</b> <b>CHICAGO HOUSING AUTHORITY</b>	<b>Grant Type and Number</b> Capital Fund Program Grant No: Date of CFFP: 9/9/2013
<b>Type of Grant</b> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:	<b>Replacement Housing Factor Grant No:</b> IL06R0002504 <b>FY of Grant:</b> 2014 <b>FY of Grant Approval:</b> 2013
<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Final Performance and Evaluation Report	<input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report
<b>Summary by Development Account</b> Signature of Executive Director Date: 9-9-13	<b>Summary by Development Account</b> Signature of Public Housing Director Date: 8/24/13
<b>Line</b>	<b>Total Estimated Cost</b> <b>Original</b> <b>Revised</b> <b>Obligated</b> <b>Expended</b>

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>2</sup> To be completed for the Performance and Evaluation Report.

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>2</sup> To be completed for the Performance and Evaluation Report.

[illegible]

<sup>1</sup> Obligation and expenditure and dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

<sup>1</sup> Obligation and expenditure end dates can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

**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		Replacement Housing Factor Grant No: IL06R002502		FY of Grant	
PIA Name:		Capital Fund Program Grant No:		Date of CFP: 9/9/2013		2014	
CHICAGO HOUSING AUTHORITY						FY of Grant Approval: 2013	
<input checked="" 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 type="checkbox"/> Final Performance and Evaluation Report							
Line	Summary by Development Account	Original	Revised 1	Obligated	Total Actual Cost 1		
1	Total non CFP Funds						
2	1406 Operations (may not exceed 20% of line 21) 1						
3	1408 Management Improvements						
4	1410 Administration (may not exceed 10% of line 21)						
5	1411 Audit						
6	1415 Liquidated Damages						
7	1430 Fees and Costs						
8	1440 Site Acquisition						
9	1450 Site Improvement						
10	1460 Dwelling Structures						
11	1465 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 1						
18a	1501.1 Collaboration or Debt Service paid by the PHA						
18b	9000.1 Collaboration 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)						
21	Amount of line 20 Related to JRP 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						

10 to be completed for the Performance and Evaluation Report  
 11 to be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
 PHAs with under 250 units in management may use 100% of CFP Grants for operations.

1 RHP 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

<b>Part I: Summary</b>	
PIA Name: <b>CHICAGO HOUSING AUTHORITY</b>	Grant Type and Number Capital Fund Program Grant No. IL06R002503 Date of CAP: 9/8/2013 EY of Grant: 2014 EY of Grant Approval: 2013
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Summary by Development Account <input type="checkbox"/> Request for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (Revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account Original Date 8-4-13 Signature of Executive Director [Signature] Signature of Public Housing Director [Signature] Date 8/24/13 Expended

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>2</sup> To be completed for the Performance and Evaluation Report.

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>2</sup> To be completed for the Performance and Evaluation Report.

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

[illegible]

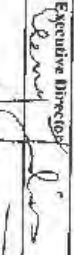
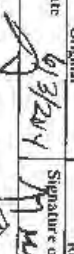
<sup>1</sup> Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9(j) of the U.S. Housing Act of 1937, as amended.

Obligation and expenditure and dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended:

## 2014 Capital Grants

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

<b>Part I: Summary</b>		<b>Grant Type and Number</b>		<b>FY of Grant</b>	
PDA Name: <b>CHICAGO HOUSING AUTHORITY</b>		Capital Fund Program Grant No. ILCH-0025014 Date of CFP: 05/31/2014		2013 FY of Grant Approval: 2014	
Replacement Housing Factor Grant No.:					
<b>Type of Grant</b>					
<input checked="" type="checkbox"/> Original Annual Statement		<input type="checkbox"/> Reserve for Disaster/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			
<b>Line</b>	<b>Signature of Executive Director</b>	<b>Date</b>	<b>Original</b>	<b>Revised</b>	<b>Expenditure</b>
		6/3/2014			4/12/14
	<b>Signature of Public Housing Director</b>	<b>Date</b>	<b>Original</b>	<b>Revised</b>	<b>Expenditure</b>
					

[illegible]

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>2</sup> To be completed for the Performance and Evaluation Report.

[illegible]

<sup>1</sup> Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9) of the U.S. Housing Act of 1937, as amended.



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 II: Summary		Project Name: <b>CHICAGO HOUSING AUTHORITY</b>		Fiscal Year and Number: Capital Fund Program Grant No.: Date of CFPE: 05/13/2014		Replacement Housing Factor Grant No. HDB0025072		F.Y. of Grant: 2015 F.Y. of Grant Approval: 2014	
Type of Grant: <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Request for Treasury/Enterprise		<input type="checkbox"/> Revised Annual Statement (revision no.: )		Total Performance and Evaluation Report			
Summary by Development Account		Original		Revised		Obligated		Expended	
Line									
1	Total line 4, top funds								
2	1400 Operations (only not exceed 20% of line 21)								
3	1401 Management Improvements								
4	1402 Administration (only not exceed 10% of line 21)								
5	1411 Audit								
6	1412 Liquidated Damages								
7	1430 Fees and Costs								
8	1440 Site Acquisition								
9	1450 Site Improvement								
10	1460 Dwelling Structures								
11	1465 1. Dwelling Equipment - Nonexpendable								
12	1470 Non-dwelling Structures								
13	1475 Non-dwelling Equipment								
14	1483 Demolition								
15	1492 Mortgage Work/Construction								
16	1495 1. Rehabilitation Costs								
17	1499 Development Activity								
18a	1501 Collaboration of Debt Services paid by the PIA								
18b	1502 Collaboration of Debt Services paid by the PIA								
19	1503 Collaboration of Debt Services paid by the PIA								
20	1502 Emergency (only not exceed 5% of line 21)								
21	Amount of line 20 (sum of lines 2-19)								
22	Amount of line 20 (Reduced to Section 504 Activities)								
23	Amount of line 20 (Reduced to Section 504 Activities)								
24	Amount of line 20 (Reduced to Section 504 Activities)								
25	Amount of line 20 (Reduced to Section 504 Activities)								

This is completed for the Performance and Evaluation Report.  
To be completed for the Performance and Evaluation Report for a Capital Fund Program.  
Please enter under 25% only in management only use 100% only for Grants for Operations.  
K11E funds should 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

<b>Part I: Summary</b>		<b>PHIA Name:</b> CHICAGO HOUSING AUTHORITY		<b>Grant Type and Number</b> Capital Fund Program Grant No: Date of CFPP: 05/13/2014		<b>Replacement Housing Factor Grant No:</b> IL06R0025009		<b>FY of Grant:</b> 2015 FY of Grant Approval: 2014	
<b>Type of Grant</b> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Reserve for Disaster/Emergency		<input type="checkbox"/> Revised Annual Statement (revision no: )					
<b>List</b>	<b>Summary by Development Account</b>	<b>Date</b>	<b>Original</b>	<b>Total Estimated Cost</b>	<b>Revised</b>	<b>Obligated</b>	<b>Total Actual Cost</b>	<b>Expended</b>	
<b>Signature of Executive Director</b> <i>Henry Jones</i>		<b>Date</b> 6-3-14		<b>Signature of Public Housing Director</b> <i>Michael Anderson</i>		<b>Date</b> 4/17/14			

Form HUD-50075.1 (4/2008)

Federal FY of Grant  
2014

<sup>1</sup> To be completed for the Performance and Evaluation Report of a Revised Annual Statement.  
<sup>2</sup> To be completed for the Performance and Evaluation Report.

PHA Name:  
CHICAGO HOUSING AUTHORITY

Obligation and expenditure ended can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.



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. 2517-0226  
Expires 4/30/2013

Part I: Summary		FUND NUMBER		CHICAGO HOUSING AUTHORITY		Capital Fund Program Grant No.		Replacement Housing Factor Grant No. (LUSP/023801)		FTEs of Grant:	
						Date of CFPP: 05/12/2014				2015	
										FTEs of Capital Approval:	
										2014	

Type of Grant		Performance and Evaluation Report for Period Ending:		Original		Revised		Integrated		Total Actual Cost	
Capital Fund Program		Summary by Development Account		Total Estimated Cost		Total Estimated Cost		Total Estimated Cost		Total Estimated Cost	
1		Total non-CFPP Funds									
2		1400 Operations (may not exceed 20% of line 21)									
3		1400 Management Improvements									
4		1410 Administration (may not exceed 10% of line 21)									
5		1410 Administration									
6		1415 (Audited) Expenses									
7		1420 Fees and Costs									
8		1430 Site Acquisition									
9		1430 Site Improvement									
10		1430 Site Improvement									
11		1430 Site Improvement									
12		1430 Site Improvement									
13		1430 Site Improvement									
14		1430 Site Improvement									
15		1430 Site Improvement									
16		1430 Site Improvement									
17		1430 Site Improvement									
18		1430 Site Improvement									
19		1430 Site Improvement									
20		1430 Site Improvement									
21		1430 Site Improvement									
22		1430 Site Improvement									
23		1430 Site Improvement									
24		1430 Site Improvement									
25		1430 Site Improvement									

To be completed for the Performance and Evaluation Report.  
To be completed for the Performance and Evaluation Report on a Period Annual Statement.  
PHAs with under \$500,000 in management may use 10% of CFPP limits for operations.  
WAF funds shall be included here.

[illegible]

Form HUD-50075.1 (4/2008)

<sup>1</sup> Obligation and expenditure and date can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.



## 2015 Capital Grants

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 06/30/2017

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

<b>Part I: Summary</b>		<b>Grant Type and Number</b> Capital Fund Program Grant No: IL06P00250115 Replacement Housing Factor Grant No: Date of CFP: 4/13/2015		<b>FFY of Grant: 2016</b> <b>FFY of Grant Approval: 2015</b>	
<b>PHA Name: CHICAGO HOUSING AUTHORITY</b>					
<b>Type of Grant</b> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Reserve for Disaster/Emergencies <input type="checkbox"/> Summary by Development Account		<input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report	
<b>Line</b>		<b>Original</b>	<b>Revised<sup>1</sup></b>	<b>Obligated</b>	<b>Total Actual Cost<sup>1</sup> Expended</b>
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) <sup>2</sup>				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—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	\$49,475,097			
17	1499 Development Activities <sup>4</sup>				

<sup>1</sup> To be completed for the Performance and Evaluation Report.

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

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

<sup>4</sup> RHF funds shall be included here.

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form HUD-50075.1 (07/2014)

**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 06/30/2017

<b>Part I: Summary</b>		FY of Grant: 2016 FY of Grant Approval: 2015	
PHA Name: <b>CHICAGO HOUSING AUTHORITY</b>	Grant Type and Number Capital Fund Program Grant No: IL06P00250115 Replacement Housing Factor Grant No: Date of CFFP: 4/13/2015		
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disaster Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending:			
Summary by Development Amount		Total Estimated Cost	Total Actual Cost <sup>1</sup>
Line		Original	Obligated
18a	1501 Collateralization or Debt Service paid by the PHA		
18b	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)	\$49,475,097	
21	Amount of line 20 Related to LIP 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		Signature of Public Housing Director	
Date		Date	

<sup>1</sup> To be completed for the Performance and Evaluation Report.

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

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFFP Grants for operations.

<sup>4</sup> RUF funds shall be included here.

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Form HUD-50075.1 (07/2014)

[illegible]

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement

<sup>1</sup> To be completed for the Performance and Evaluation Report.

<sup>1</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>2</sup> To be completed for the Performance and Evaluation Report.





U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 06/30/2017

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

<b>Part I: Summary</b>		<b>PHIA Name: CHICAGO HOUSING AUTHORITY</b>		<b>Grant Type and Number</b> Capital Fund Program Grant No: Replacement Housing Factor Grant No: IL06R00250115 Date of CFFP: 4/13/2015		<b>FY of Grant: 2016</b> <b>FY of Grant Approval: 2015</b>	
<b>Type of Grant</b> <input checked="" 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 type="checkbox"/> Final Performance and Evaluation Report	
<b>Summary by Development Account</b>		<b>Original</b>		<b>Revised<sup>1</sup></b>		<b>Total Estimated Cost</b>	
<b>Line</b>		<b>Obligated</b>		<b>Obligated</b>		<b>Total Actual Cost<sup>1</sup></b>	
1 Total non-CFFP Funds							
2 1406 Operations (may not exceed 20% of line 21) <sup>2</sup>							
3 1408 Management Improvements							
4 1410 Administration (may not exceed 10% of line 21)							
5 1411 Audit							
6 1415 Liquidated Damages							
7 1430 Fees and Costs							
8 1440 Site Acquisition							
9 1450 Site Improvement							
10 1460 Dwelling Structures							
11 1465.1 Dwelling Equipment—Non-perishable							
12 1470 Non-dwelling Structures							
13 1475 Non-dwelling Equipment							
14 1483 Demolition							
15 1492 Moving to Work Demonstration							
16 1495.1 Relocation Costs			\$4,407,125				
17 1499 Development Activities <sup>4</sup>							

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

Page 1

Form HUD-50075.1 (07/2014)

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 06/30/2017

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

<b>Part I: Summary</b>		FFY of Grant: 2016 FFY of Grant Approval: 2015	
PIA Name: CHICAGO HOUSING AUTHORITY	Grant Type and Number Capital Fund Program Grant No. Replacement Housing Factor Grant No. ILJ6R00250115 Date of CFP: 4/13/2015		
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:			
<input type="checkbox"/> Reserve for Disaster/Unemergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost <sup>1</sup>
		Original	Revised <sup>2</sup> 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 <sup>3</sup> (sum of lines 2 - 19)	\$4,407,125	
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		Signature of Public Housing Director	
Date		Date	

<sup>1</sup> To be completed for the Performance and Evaluation Report.

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

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

<sup>4</sup> RHF funds shall be included here.

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Form HUD-50075.1 (07/2014)







[illegible]

<sup>1</sup> Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires: 06/30/2017

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

Part I: Summary		Grant Type and Number		FFY of Grant: 2016 FFY of Grant Approval: 2015	
PHIA Name: CHICAGO HOUSING AUTHORITY		Capital Fund Program Grant No: Replacement Housing Factor Grant No: IL06600250215 Date of CFFP: 4/13/2015			
Type of Grant <input checked="" 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"/> Summary by Development Account					
Line		Original		Total Estimated Cost Revised <sup>2</sup>	
1		Total non-CFF Funds		Obligated	
2		1405 Operators (may not exceed 20% of line 21) <sup>1</sup>		Total Actual Cost <sup>1</sup> Expended	
3		1408 Management Improvements			
4		1410 Administration (may not exceed 10% of line 21)			
5		1411 Audit			
6		1415 Liquidated Damages			
7		1430 Fees and Costs			
8		1440 Site Acquisition			
9		1450 Site Improvement			
10		1460 Dwelling Structures			
11		1465.1 Dwelling Equipment—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		\$12,818,026	
17		1499 Development Activities <sup>4</sup>			

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFFP Grants for operations.  
<sup>4</sup> RHFF 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 06/30/2017

<b>Part I: Summary</b>		FFY of Grant: 2016 FFY of Grant Approval: 2015	
PHA Name: <b>CHICAGO HOUSING AUTHORITY</b>	Grant Type and Number: Capital Fund Program Grant No.: Replacement Housing Factor Grant No.: IL06R002-502115 Date of CFFP: 4/13/2015		
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Revised Annual Statement (replaces 00) <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Original	Revised <sup>1</sup>
18a	1501 Collateralization or Debt Service paid by the PHA		Obligated
18b	9000 Collateralization or Debt Service paid Via System of Direct Payment		Expended
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$12,818,026	
21	Amount of line 20 Related to LRF 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		Signature of Public Housing Director	
Date		Date	

<sup>1</sup> To be completed for the Performance and Evaluation Report.

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

<sup>3</sup> PHAs with under 250 units in management may use 100% of CFF Grants for operations.

<sup>4</sup> RHF funds shall be included here.

Page 3

Form HUD-50075.1 (07/2014)









CHA Amended FY2017 MTW Annual Plan- Submitted to HUD 8.25.17



**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 06/30/2017

<b>Part I: Summary</b>		<b>FY of Grant: 2017</b>		<b>FY of Grant Approval: 2016</b>	
<b>FHA Name:</b> CHICAGO HOUSING AUTHORITY	<b>Grant Type and Number:</b> Capital Fund Program Grant No: Replacement Housing Factor Grant No. IL01R00250216 Date of CFP: 4/13/2016				
<b>Type of Grant:</b> <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:					
<input type="checkbox"/> Reserve for Disaster/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Revised Annual Statement (revised 80%) <input type="checkbox"/> Final Performance and Evaluation Report			
<b>Line</b>	<b>Summary by Development Account</b>	<b>Total Estimated Cost</b>	<b>Method<sup>1</sup></b>	<b>Obligated</b>	<b>Total Actual Cost<sup>1</sup></b>
16a	1501 Collateralization or Debt Service paid by the FHA				
16aa	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 <sup>2</sup> (sum of lines 2 - 19)				
21	Amount of line 20 Related to LBF Activities			\$8,149,384	
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				
<b>Signature of Executive Director</b>		<b>Date</b> 3/16/17		<b>Signature of Public Housing Director</b>	
				<b>Date</b>	

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





Annual Scorecard Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement, Housing Fund and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OWD No. 2577-0226  
Expires 06/30/2017

[illegible]

<sup>1</sup>Cholesterol was determined by a standard method (Hodges and Hodge, 1962) approved pursuant to National Center for Human Genome Research (NCHGR) guidelines.

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1-800-850-7211 (010314)

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

1/5, Department of Housing and Urban Development,  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 06/30/2017

[illegible]

Obligation and expenditure and dated can only be related with HUD approval payment to Section 8 of the 1990 Housing Act of 1997 as amended.

### 2014 Capital Fund

**Capital Fund Program  
(CFP) Amendment  
To The Consolidated Annual Contributions  
Contract (form HUD-53012)**

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

Agency (Public Housing Authority):	Chicago Housing Authority	11002	Admin. action line 11013
and the United States of America:	Secretary of Housing and Urban Development (when called "HUD") entered into Consolidated Annual Leasehold		
Contracting Agency Number(s):	CG 1014 dated 12/11/1995		

Whereas, HUD has agreed to provide CDF assistance, upon expiration of this Amendment, to the PHA in the amount to be specified below for the purpose of assisting the PHA in carrying out development, capital and management activities in assisting public housing projects in order to ensure the PHA projects continue to be capable to serve low-income families, HUD reserves the right to provide additional CDF assistance at this PHA to the PHA. HUD will provide a revised ACO Amendment authorizing such additional amounts.

For Fiscal Year 2019 to be referred to under Capital Fund Grant Number: 14-7F000250+16

Alumina, HCl and the PRA are entering with the CPE Amendment Number

FROM TRANSDUCERS, THE ACC(0) IS (A/9), REINTERPRETED AND /ADJUSTED

\* The ACT-113 is (are) intended to provide CFP membership to the current members above for ownership, capital and management activities of FPA groups. This CFP Agreement is a part of the ACT-113.

2. The PRA must carry out all developments, capital and management activities in accordance with the United States Housing Act of 1937 (the AHJ), 24 CFR Part 9605 (the Capital Fund Rule) published at 78 Fed. Reg. 52745 (October 24, 2013), as well as other applicable HUD requirements, except that the limitation in section 9605(a) of the Act is increased such that the amount of CFF assistance provided for useful life CFF amendments only, the PRA may use for more than 25 percent for activities that are eligible under section 96(c) of the Act only if the PRA has approved the Year Action Plan provides for such use however, if the PRA owns or controls less than 25% public housing existing units, such PRA may continue to use the full flexibility in section 96(c) of the Act.

3. The PMA has a PMA-approved Capital Fund Five Year Action Plan and has completed the requirements for reporting on open source through the Performance and Evaluation Report. The PMA must comply with 24 CFR 906.300 of the Capital Fund Final rule replacing amendment of the Five Year Action Plan where the PMA proposed a Significant Amendment to the Capital Fund Five Year Action Plan.

4. For grantees whose HUD has entered into a Capital Fund Financing Agreement with the ACC, HUD will deduct the payment for amortization scheduled payments from the grant introductory on the effective date of this CFF Amendment. The payment of CFF funds that per the amortization schedule will be made directly to a disbursement institution 3 days of the due date.

Unless otherwise provided, the 24 month time period in which the PFA must fulfill the CFP assistance pursuant to section 902(c) of the Act and 46 month time period in which the PFA must complete the CFP assistance pursuant to section 902(c) of the Act starts with the effective date of the CFP amendment (the date on which CFP assistance becomes available to the PFA for disbursement). Any additional CFP assistance that is not started within the same effective date.

8. Subject to the provisions of the ACA(1) and the agreement 2, and in view of an environment, gender and management activities, HUI agreed to allocate in the FY14 - the designated NUSKA from 10th to 15th as remained up to the amount of the running activities identified female.

1 The T-234 shall continue to operate each public housing project on low-income housing in compliance with the AFDCG as amended, the Act and all HUD regulations for a period of twenty years after the last disbursement of CDF monies for modernization activities for each public housing project in general (herein and for a period of fifty years after the last disbursement of CDF

assistance for development activities for each public housing project and for a period of two years following the last payment of assistance from the Operating Fund to each public housing project. However, the provisions of Section 7 of the AGC shall remain in effect so long as HUD determines there is any outstanding indebtedness of the PHA to HUD which arose in connection with any public housing project(s) under the AGC and which is not eligible for forgiveness, and provided further that, no disposition of any project obtained by this amendment shall occur unless approved by HUD.

8. The PPA shall accept all CFP information provided for this PPA. If the PPA does not comply with any of its obligations under this CFP agreement and does not have its Annual PPA Plan approved within the next specified year by HUD, HUD shall impose such penalties or take such remedial action as provided by law. HUD may direct the PPA to terminate all work described in the Capital Fund Annual Statement of the Annual PPA Plan. In such case, the PPA shall rely only on additional costs with HUD approval.

10. Implementation of use of funding submission provided under the CFT Amendment is subject to the approval of the relevant authority (yes/no) ☐ Yes ☒ No

10. The PHU is required to report in this format and frequency estimated by HUD on all down payment funds gross earned, including information in the appendix, of award/construction measure.

11.1.1.2 CCF assessments is provided for activities authorized pursuant to agreements between HUD and the PHA under the Public Assistance Demonstration Program, the PHA shall follow such applicable regulatory requirements and all applicable HUD regulations and requirements. For low-income of nursing home residents, the provisions of Section 7 of the AGC shall require to either for so long as HUD determined that it is not necessary to discontinue the use of PHA to HUD which arose in connection with any ethnic housing projects under the AGC(s) and which is not subject to the provisions, and provided further that, no disposition or conversion of any public housing project covered by these terms and conditions shall occur unless approved by HUD. For public housing, the PHA shall continue to operate with non-conversion public housing project for low-income housing (i) accordance with section 7.

12. If FFA membership is treated as an Employment grant or a State which directly  
 will not be subject to a 15 month obligation that 24 months membership be  
 period. If FFA membership is treated as a Transfer of money grant that the subject has  
 15 month obligation and the subject obligation will be null. The next step  
 will be the state on which basis funding activities is available in the next 15  
 months. The FFA will then receive the Employment or Transfer of money grant of the  
 state and the state will receive the funds.

The parties have executed the CFP Amendment, and it will be effective on 4/13/2016. That is the date in which CFP assistance becomes subject to the FPA's jurisdiction.

U.S. Department of Housing and Urban Development  
By \_\_\_\_\_

PMI Reports Back to a Reduced Scope

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1

**THE UNIVERSITY OF CHICAGO PRESS**

Form W-9 (Rev. 4-15) Data Approved by IRS-01/01/01 Page 1 of 1

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  
OMH No. 2577-0226  
Expires 06/30/2017

<b>Part I: Summary</b>		FY of Grant: 2017	
<b>PHA Name:</b> CHICAGO HOUSING AUTHORITY	<b>Grant Type and Number:</b> Capital Fund Program Grant No. Replacement Housing Factor Grant No. B01R00250116 Date of CFP: 4/13/2016	FY of Grant Approval: 2016	
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Summary by Development Account			
<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report		Total Actual Cost <sup>1</sup>	
Line		Original	Revised <sup>2</sup>
18a	1501 Collateralization or Debt Service paid by the PHA		Obligated
18b	9000 Collateralization or Debt Service paid Via System of Direct Payment		Expended
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant <sup>3</sup> (sum of lines 7 - 19)	\$2,331,531	
21	Amount of line 20 Related to LBP Activities		
22	Amount of line 20 Related to Section 304 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		Signature of Public Housing Director	
Date		Date	

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

Animal Sciences/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement (Training, Finance and  
Capital Fund Financing Program)

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
DAB No. 2377-0226  
Expires 06/30/2017

[illegible]

<sup>2</sup> To be considered for the Performance and Evaluation Report or a Revised Annual Statement.

Annual Statement Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement (Mining) (Saves) and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2577-0226  
Expires 06/30/2017

[illegible]

To be completed for the Participant and Evaluation Experts (or a Licensed Alcohol Specialist)

To be eligible for the President's and Governors' School

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

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 2579-0226  
Expires 06/30/2017

[illegible]

(de)greco and colleagues did indeed strongly recommend that TCD against *S. aureus* be taken by the time 0.5–1 hour (2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834,

Annual Statement Performance and Evaluation Report  
Capital Fund Program, Capital Field Programs Supplement Housing Factor and  
Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
Office of Public and Indian Housing  
OMB No. 25-77-0-236  
Expires 06/30/17

[illegible]

Obligation and responsibility And disast can only be waived with HUD approval pursuant to Section 91 of the U.S. Housing Act of 1937, as amended.



# APPENDICES

## **Appendices**

### ***CHA Local Asset Management Plan***

CHA's Amended and Restated MTW Agreement authorizes the Authority to design and implement a local asset management program for its Public Housing Program. As identified in the amended MTW agreement, the term "Public Housing Program" means the operation of properties owned or subsidized by the Authority that are required by the U.S. Housing Act of 1937 to be subject to a public housing declaration of trust in favor of HUD.

CHA has developed this program to ensure that accounting and financial reporting methods comply with OMB Circular A-87 regarding cost allocations, OMB Circular A-133 regarding audit requirements, and generally accepted accounting practices (GAAP).

The local asset management program incorporates the following key components:

- Implementation of project-based management – CHA has decentralized property operations to each property by contracting with professional private management companies. These private management companies manage the day-to-day operations in accordance with HUD public housing requirements and are overseen by CHA's Asset Management staff.
- Budgeting and accounting – Public housing operating budgets at the property level are completed annually and the related accounting activities are maintained at that level as well. This model allows the Authority to operate and monitor its asset portfolio as Asset Management Projects (AMPS).
- Financial management – Financial analysis is performed on a monthly basis, at the property level, to ensure operating budgets are properly managed. Financial reporting requirements are in accordance with the amended Moving to Work Agreement as well as OMB Circular A-87.

### **Program Principles**

CHA's Public Housing Program's local asset management plan applies the following principles related to program costs:

- Costs incurred are deemed reasonable and consistent with the amended Moving to Work Agreement.
- Costs shall be accorded consistent treatment.
- Costs shall be determined in accordance with GAAP.
- Costs are adequately documented.
- CHA will report results according to HUD MTW guidelines.

### **Cost Allocation Approach**

CHA's Amended and Restated Moving to Work Agreement identifies either a "fee-for-service" option or an "indirect cost" option to be utilized to distribute direct and indirect costs under local asset management plan under Circular A-87. CHA utilizes an indirect cost allocation. CHA is in keeping with 24 CFR 990 and uses property level management, accounting, and budgeting and has established a Central Office Cost Center (COCC).

As stated in Circular A-87, there is no universal rule for classifying costs as either direct or indirect. A cost may be direct with respect to some specific service or function, but indirect with respect to the final cost objective. Direct costs associated with project activities are allocated to the specific properties receiving the benefit of the expenditure. Direct and indirect costs associated with the COCC are allocated on a reasonable basis and, if allocated to public housing properties, are substantially done using a project unit distribution basis.

The following Central Office Cost Center business units are in place at CHA:

- Executive Office
- Legal Services

- Finance
- Administration
- Property Division
- Housing Choice Voucher
- Resident Services
- Capital Construction and Development Management

### CHA Cost Objectives under MTW

As a Moving to Work Demonstration program agency, the CHA utilizes single fund flexibility which allows the combination of the Public Housing Operating Fund, Public Housing Capital Fund, and Section 8 Housing Choice Voucher Program funding sources. Cost objectives for each program are taken into consideration as program level budgets are developed, accounting activities implemented, and financial reporting designed.

Direct and indirect costs associated with the COCC are allocated on a reasonable basis and use a cost benefit approach. The following tables include, but are not limited to, the direct and indirect costs associated with CHA's Moving to Work Demonstration program:

Program Direct Costs	
Operating costs	Operating costs directly attributable to properties
Asset Management Department costs	Housing assistance payments
Capital improvement costs for properties	Property development costs
Resident Services Department costs	Legal costs
Insurance Costs	Housing Assistance Payments
Housing Choice Voucher department costs	Portability fees and expenses
Homeownership program costs	Any other cost readily identifiable to a property

Program COCC Indirect Costs	
Executive management costs	Procurement-related costs
Personnel administration costs	Information technology services
General finance and accounting costs	Grant management costs
Shared services costs	Any other administrative or indirect cost

### Financial Reporting

CHA utilizes a project-level accounting system to track costs at the asset management property level and submits information to HUD through the following reporting systems:

- PIH Information Center (PIC);
- Voucher Management System (VMS);
- HUD Financial Data Schedule (FDS) on an annual basis; and
- The Annual Audit, with necessary supplemental schedules (Comprehensive Annual Financial Report)

## ***CHA - Affirmatively Furthering Fair Housing***

### ***Physical Housing Stock—Public Housing***

In May 2013, CHA successfully completed all of the benchmarks required in its Section 504 VCA with HUD. Since completing the VCA, CHA continues to incorporate accessibility standards into new construction and rehabilitation, ensuring that housing is provided for people with disabilities both currently residing in CHA housing and those on its waiting lists. Whereas most housing authorities provide 5.0% and 2.0% of its housing for people with mobility and sensory impairments respectively, CHA provides 5.3% and 2.1% respectively.

Although the VCA is complete, CHA is committed to complying with the aforementioned requirements. The CHA will continue contracting with LCM Architects to certify all UFAS Mobility and Sensory units. LCM has certified that over 1350 mobility units in the CHA portfolios meet the exacting standards of UFAS 504. Maintaining the certification process with LCM, which has been accepted and approved by HUD, provides the CHA with inexpensive insurance for the future that the continuing requirements of 5.3% of mobility units and 2.1% of sensory units meet or exceed imposed standards.

CHA also works extensively with the City of Chicago to comply with the City of Chicago's Building Code - specifically Chapter 18-11 that addresses issues of accessibility. In CHA's newly redeveloped properties, four stories or more in height containing 10 or more dwelling units, 20% of the developments are mandated to be made adaptable for people with disabilities and the CHA works with its developers to build the required units.

### ***Non-Housing Programs***

CHA has a department of three staff dedicated to addressing issues of fair housing and disability in subsidized housing. The Housing Rights and Nondiscrimination Department (HRND) is responsible for bringing and keeping the entire housing authority in compliance with all applicable fair housing and disability-related regulations. HRND monitors and addresses issues of fair housing discrimination as well as issues decisions on reasonable accommodations for both public housing and Housing Choice Voucher (HCV) participants. In the past year, CHA has issued 479 decisions on reasonable accommodation requests submitted by CHA public housing residents and 1,581 decisions on reasonable accommodation requests submitted by CHA HCV participants.

HRND organizes and facilitates Authority-wide trainings on issues of fair housing and disability. For the past several years, CHA staff for public housing and HCV, including all Private Property Managers of CHA's public housing portfolios and all HCV contract vendors, have been mandated to attend training to learn about updated policies and procedures relative to fair housing and disability. HRND educates the audience on specific issues such as Violence against Women Act updates, the CHA's Fair Housing Discrimination Complaint Procedure, and the reasonable accommodation process.

The CHA plans to conduct Fair Housing and Disabilities trainings in the 3<sup>rd</sup> quarter of 2016. The trainings will include CHA's updated reasonable accommodation procedure which will process and track reasonable accommodations through an on-line portal. This automated process will allow HCV participants and public housing residents to submit and track their reasonable accommodation requests on-line. This system will streamline requests by allowing the CHA to transmit forms directly to knowledgeable professionals on-line through both email and fax and will notify CHA staff when forms have not been returned in a timely manner. The system will also be used to communicate directly with both property management staff and HCV housing specialists to ensure requests that involved multiple departments are completed.

In the HCV Program, CHA created the first of its kind Modification Fund, which consists of a pool of money set-aside for the construction and installation of accessibility features for HCV participants. CHA entered into a partnership with the Mayor's Office for People with Disabilities (MOPD) in April 2016 to provide customized accessibility modifications that meet the needs of people with disabilities. Since 2011, MOPD has performed 287 home mods citywide. The partnership has value for both CHA and MOPD because it expands the number of accessible housing units in the city while giving HCV participants the features they need to remain in their homes. CHA pays only the hard costs for the modifications without an added administration fee.

Under the program, CHA refers people to MOPD for an assessment and then after it is determined that the modifications can be made, the work is performed. Modifications can include: ramps, porch and stair lifts, roll-in showers, widened doorways, accessible sinks and cabinets. All services will be performed in accordance with federal, state and municipal accessibility legal requirements.

The CHA, under its MTW Program, issues tenant-based vouchers as part of a demonstration program to expand affordable housing choices within housing opportunity areas in the City of Chicago. In order to access housing in these areas, the CHA may approve special exception payment standards on a unit-by-unit basis up to 150% of the HUD published Fair Market Rates for the City of Chicago. This program gives HCV participants access to amenities in designated economic opportunity areas, such as better education, healthier food. The program also encourages integration throughout the city. A disabled individual may request a reasonable accommodation for an exception payment standard on a unit-by-unit basis up to 150% to allow them to find specific units that are accessible to their disability related needs.

The CHA anticipates that it will conduct Fair Housing Testing in the 4<sup>th</sup> quarter of 2016. The testing will include source of income tests in opportunity areas to determine barriers to mobility for HCV participants. The CHA anticipates contracting with an outside fair housing agency with extensive knowledge of local, state and federal fair housing laws. The testing results will be used to analyze fair housing issues and shape CHA's fair housing goals as part of the forthcoming Assessment of Fair Housing.

CHA is currently working with several partners to address fair housing impediments, including Access Living, The Chicago Lawyers' Committee for Civil Rights Under Law, the John Marshall Fair Housing Clinic, the Chicago Area Fair Housing Alliance (CAFHA) and the Chicago Commission on Human Relations (CCHR). The CHA works closely with CCHR regarding cases that involve source of income discrimination. The CHA provides training and information to CCHR regarding public housing authority policies and procedures as well as CHA's specific MTW activities that may not apply to other agencies within their jurisdiction. The CHA also plans to initiate a Fair Housing Task force in the 3<sup>rd</sup> quarter of 2016. This task force will consist of the aforementioned fair housing agencies, federal state and local government and organizations that represent realtors, private property managers and landlords. The task force will specifically address fair housing issues related to CHA public housing residents and HCV participants.

### ***Rental Assistance Demonstration Program***

Through RAD, CHA is converting select properties to Project-Based Vouchers (PBV) under the guidelines of PIH Notice 2012-32 (HA) H-2017-03, , REV-3 and any successor notices. Upon conversion to Project-Based Vouchers, CHA will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6.C & 1.6.D of PIH Notice 2012-32 (HA) H-2017-03, REV-3 as amended by applicable HUD permissions and CHA's MTW authority. These resident rights, participation, waiting list and grievance procedures are appended to this Amendment. Additionally, CHA is currently and will remain compliant under RAD with all fair housing and civil rights requirements, Gautreaux and other court orders, if applicable, and the requirements of its existing Section 3 Voluntary Compliance Agreement with HUD.

RAD was designed by HUD to assist in preserving affordable housing assets and addressing capital needs of public housing by providing CHA with access to private sources of capital. Upon conversion, CHA's Capital Fund Budget will be reduced by the pro rata share of public housing units converted to PBV as part of the Demonstration, and CHA may also borrow funds to address capital needs in the future. CHA has and will continue to conduct physical capital needs assessments to determine the need for appropriate contributions to replacement reserves and to determine the immediate capital needs to address during the conversion of properties.

Regardless of any funding changes that may occur as a result of conversion under RAD, CHA will maintain its continued service level as calculated using HUD's MTW Baseline methodology.

Specific information related to the additional public housing developments anticipated for RAD follows.

	PIC AMP	RAD Type	Total Units	Unit Mix Pre-Conversion / Post-Conversion	Pre-RAD Type	Transfer of Assistance Proposed	Capital Fund Allocation
<b>Fannie Emanuel (Parkview)</b>	IL002065000	PBV	181	1BR - 181	Mixed Finance-Senior	No	\$24,000,000
<b>Daniel Burnham Apts—converted 2016</b>	IL002075000	PBV	181	1BR - 181	Traditional Senior	No	\$7,400,000
<b>Schneider Apts</b>	IL002059000	PBV	174	1BR - 174	Traditional Senior	No	\$5,222,933
<b>Las Americas Apts</b>	IL002063000	PBV	212	1BR - 211 2BR - 1	Traditional Senior	No	\$7,110,040
<b>Lorraine Hansberry Apts</b>	IL002064000	PBV	169	1 BR - 169	Traditional Senior	No	\$8,900,000
<b>Mary Hartwell Catherwood</b>	IL002055000	PBV	357	OBR - 11 1BR - 343 2BR - 3	Traditional Senior	No	TBD
<b>Margaret Day Blake (incl. Maria Diaz Martinez and Elizabeth Woods)</b>	IL002072000	PBV	317	1BR - 313 2BR - 4	Traditional Senior	No	TBD

<b>Zelda Ormes</b>	IL002049000	PBV	269	OBR - 82 1BR - 186 2BR - 1	Traditional Senior	No	TBD
<b>Kenneth Campbell</b>	IL002082000	PBV	165	OBR - 24 1BR - 140 2BR - 1	Traditional Senior	No	TBD
<b>Mahalia Jackson</b>	IL002041000	PBV	282	OBR - 24 1BR - 140 2BR - 1	Traditional Senior	No	TBD
<b>Hilliard 1 Senior</b>	IL002135000	PBV	94	1BR - 94 (public housing)	Mixed-Income	No	\$900,000
<b>Hilliard 2 Senior</b>	IL002100000	PBV	94	1BR - 94	Mixed-Income	No	\$900,000
<b>Caroline Hedger—converted 2016</b>	IL002076000	PBV	450	OBR - 303 1BR - 145 2BR - 2	Traditional Senior	No	\$1,200,000
<b>Minnie Riperton—converted 2016</b>	IL002078000	PBV	339	OBR - 13 1BR - 325 2BR - 1	Traditional Senior	No	\$4,0500,000
<b>Robert Lawrence</b>	IL002086000	PBV	193	1BR - 192 2BR - 1	Traditional Senior	No	\$9,524,705
<b>Ada S. Dennison McKinley</b>	IL002081000	PBV	125	1BR - 124 2 BR - 1	Traditional Senior	No	TBD
<b>Ella Flagg Young Apts (incl. Castleman)</b>	IL002060000	PBV	436	OBR - 40 1BR - 396	Traditional Senior	No	TBD
<b>William Jones Apts</b>	IL002070000	PBV	116	1BR - 115 2BR - 1	Traditional Senior	No	TBD
<b>Irene McCoy Gaines Apts</b>	IL002062000	PBV	151	OBR - 32 1BR - 118 2BR - 1	Traditional Senior	No	TBD
<b>Alfreda Barnett Duster</b>	IL002042000	PBV	129	OBR - 26 1BR - 101 2BR - 1	Traditional Senior	No	TBD
<b>Elizabeth Davis Apts</b>	IL002050000	PBV	149	1BR - 148 2BR - 1	Traditional Senior	No	TBD
<b>Albany Terrace</b>	IL002061000	PBV	350	1BR - 350	Traditional Senior	No	TBD
<b>Edith Spurlock Sampson</b>	IL002074000	PBV	394	OBR - 46 1BR - 346 2BR - 2	Traditional Senior	No	TBD
<b>Flannery</b>	IL002044000	PBV	252	OBR - 54 1BR - 196 2BR - 2	Traditional Senior	No	TBD
<b>Wicker Park</b>	IL002068000	PBV	225	1BR - 223 2BR - 2	Traditional Senior	No	TBD
<b>Long Life</b>	IL002066000	PBV	116	1BR - 115 2BR - 1	Traditional Senior	No	TBD

Mary Jane Richardson (incl. Maudelle Brown Bousfield)	IL002079000	PBV	266	OBR – 87 1BR – 177 2BR - 2	Traditional Senior	No	TBD
Vivian Gordon Harsh (incl. Judge Green)	IL002083000	PBV	278	OBR - 21 1BR - 255 2BR - 2	Traditional Senior	No	TBD
Judge Fisher	IL002057000	PBV	199	OBR – 40 1BR - 159	Traditional Senior	No	\$11,008,000
Lidia Pucinska	IL002043000	PBV	378	1BR – 375 2BR - 2	Traditional Senior	No	TBD
Patrick Sullivan	IL002067000	PBV	482	OBR – 240 1BR – 240 2BR - 2	Traditional Senior	No	TBD
Armour Square	IL002046000	PBV	392	OBR – 43 1BR – 345 2BR - 4	Traditional Senior	No	TBD
Lincoln Perry—converted 2016	IL002052100	PBV	450	OBR – 8 1BR 440 2BR – 2	Traditional Senior	No	\$7,650,000
Judge Slater—converted 2016	IL002084000	PBV	407	OBR – 13 1BR – 393 2BR - 1	Traditional Senior	No	\$7,250,000
Vivian Carter	IL002080000	PBV	224	OBR 21 1BR – 255 2BR - 2	Traditional Senior	No	TBD
Hattie Callner	IL002048000	PBV	147	OBR - 30 1BR - 116 2BR - 1	Traditional Senior	No	TBD
Horner Westhaven (Superblock)*—converted 2016	IL002156000	PBV	95	1BR=30/1BR=38 2BR=54/2BR=31 3BR=99/3BR=21 4BR=10/4BR=4 5BR=8/5BR=1	Mixed-income	No	TBD
Lathrop Homes*	IL002022000	PBV	400	1BR-454/1BR-TBD 2BR-401/2BR-TBD 3BR-63/3BR-TBD 4BR TBD	Mixed-Income	Yes – multiple locations TBD	TBD
Devon Place	N/A	PBV	33	OBR – 3 1BR – 9 2BR - 21	Family	Yes – Proposed Transfer from Lathrop Homes	TBD
6438 N. Sheridan (The Concord)	N/A	PBV	65	1BR – 47 2BR - 18	Family	Yes – Proposed Transfer from	\$20,000,000

						<i>Lathrop Homes</i>	
<b>4501 N. Winchester</b>	N/A	PBV	74	1BR - 74	Senior	Yes – Proposed Transfer from Lathrop Homes	TBD
<b>2031 – 37 N. Milwaukee</b>	N/A	PBV	47	1BR – 35 2BR – 12	Family	Yes – Proposed Transfer from Lathrop Homes	TBD
<b>5525 W. Diversey</b>	N/A	PBV	45	1 BR – 45	Family	Yes – Proposed Transfer from Lathrop Homes	TBD
<b>4022 N. Elston</b>	N/A	PBV	Apx. 44	1 BR - 44	Senior	Yes – Proposed Transfer from Lathrop Homes	TBD
<b>6800-6824 N. Western/2414-2422 W. Pratt</b>	N/A	PBV	Apx. 44	1 BR - 44	Senior	Yes – Proposed Transfer from Lathrop Homes	TBD
<b>Various Addresses TBD on North Side of Chicago in Gautreaux General Areas</b>	-		Apx. 173	TBD	TBD	Yes – Proposed Transfer from Lathrop Homes	TBD
<b>Altgeld Gardens*</b>	IL002002000				Family	244 to be Transfer of Assistance	
<b>Ickes Phase 1A and 1B</b>			Apx. 94	TBD	Family	Yes – Proposed Transfer from Altgeld Gardens	TBD

Balance of Altgeld Gardens Transfer of Assistance to Various Addresses			150	TBD	TBD	Yes – Proposed Transfer from Altgeld Gardens	TBD
Langston	IL002021000	PBV	29	1BR – 9 2BR – 11 3BR – 4 4BR – 5	Mixed- Income	No	TBD
Quincy	IL002020000	PBV	27	1BR – 5 2BR – 14 3BR – 7 4BR – 1	Mixed- Income	No	TBD
*Represents proposed partial RAD conversions							

## RAD Residents Rights, Participation, Waiting List and Grievance Procedures for PBV

### *Extracted from PIH Notice 2012-32, REV-2, Section 1.6 (C), adapted for CHA-specific policies*

In FY2014, CHA updated the HCV Administrative Plan to reflect the below RAD-specific policies, as well as created a RAD lease/lease addendum and RAD grievance procedure. These RAD policies were released for public comment in November 2014 and approved by CHA's Board in January 2015.

- 1. No Re-screening of Tenants upon Conversion.** Pursuant to the RAD statute and regulations, at conversion, current households are not subject to rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family.
- 2. Right to Return.** Other than the Horner Superblock, CHA has not confirmed plans to substantially rehabilitate occupied RAD properties that would require off-site temporary displacement of any residents at the time of RAD conversion. If it is later determined that off-site relocation is required for select sites, CHA will comply with all RAD relocation and Right of Return provisions. For the Horner Superblock, CHA will follow the relocation process outlined in the November 2013 Horner Agreed Order and the Tenant Relocation Plan for Horner Phase I Superblock Development approved by HUD.
- 3. Renewal of Lease.** Under RAD, CHA or the owner must renew all leases upon lease expiration, unless cause exists. This provision is incorporated into the CHA tenant lease and lease addendum, as appropriate. The lease renewal policy, along with other RAD policy updates, were incorporated into the HCV Administrative Plan that was released for public comment in November 2014 and approved by CHA's Board in January 2015.
- 4. Phase-in of Tenant Rent Increases.** If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 5 years. To implement this provision, HUD is waiving section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) only to the extent necessary to allow for the phase-in of tenant rent increases. As part of

necessary updates to the HCV Administrative Plan, CHA created a policy setting the length of the phase in period at five years. This policy will be in place at conversion and may not be modified after conversion.

Rent adjustments under the 5-year phase-in schedule are anticipated to occur at annual or interim re-examinations. After this phase-in period, impacted residents will transition to biennial re-examinations (every two years) or triennial re-examinations (every three years), as applicable per CHA's MTW authority, once the calculated income-based TTP is reached. CHA's updated Admissions and Continued Occupancy Policy (ACOP) and HCV Administrative Plan contain more information regarding requirements and qualifications for biennial and triennial re-examinations.

The below method explains the set percentage-based phase-in an owner must follow according to the phase-in period established. For purposes of this section "standard TTP" refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the "most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058.

#### Five Year Phase in:

- Year 1: Any re-examination (interim or annual) performed prior to the second annual re-examination after conversion – 20% of the difference between most recently paid TTP and the standard TTP
- Year 2: Year 2 annual re-examination and any interim re-examination prior to Year 3 annual re-examination – 40% of the difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 annual re-examination and any interim re-examination prior to Year 4 annual re-examination – 60% of the difference between most recently paid TTP and the standard TTP
- Year 4: Year 4 annual re-examination and any interim re-examination prior to Year 5 annual re-examination – 80% of the difference between most recently paid TTP and the standard TTP
- Year 5 annual re-examination and all subsequent re-examinations – Full standard TTP

Once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward. As previously stated, upon completion of the 5-year phase-in period, CHA tenants will be transitioned to biennial or triennial re-examination schedules as applicable.

5. **Public Housing Family Self Sufficiency (PH FSS).** Current Public Housing FSS participants will continue to be eligible for FSS once their housing is converted under RAD. CHA will be allowed to use any remaining PH FSS funds to serve those FSS participants who live in units converted by RAD. Due to the program merger between PH FSS and HCV FSS that took place pursuant to the FY14 Appropriations Act (and was continued in the FY15 Appropriations Act), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD. CHA will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984, the participants' contracts of participation, and the alternative requirements established in the "Waivers and Alternative Requirements for the FSS Program" Federal Register notice, published on December 29, 2014, at 79 FR 78100. Escrowed funds for PH FSS participants will be transferred into the HCV escrow account.

- 6. Resident Participation and Funding.** Resident organizations and representation in place at CHA properties prior to the RAD conversion will continue to be managed and recognized in accordance with current CHA policies and HUD regulations.
- 7. Resident Procedural Rights.** The following items will be incorporated into both CHA's HCV Administrative Plan and the owner's lease (including the required lease or lease addendum), as applicable.
  - a. Termination Notification.** CHA's termination procedure for RAD will provide adequate written notice of termination of the lease. As required, CHA developed a termination policy that was included in updates to the HCV Administrative Plan that were released for public comment in November 2014 and approved by CHA's Board in January 2015.
  - b. Grievance Process.** For issues related to tenancy and termination of assistance, CHA will provide an opportunity for an informal hearing. As required, CHA developed a grievance procedure that incorporates essential components of the current public housing grievance process as well as required RAD provisions. CHA's RAD grievance procedure was released for public comment in November 2014 and approved by CHA's Board in January 2015.
- 8. Earned Income Disregard (EID).** Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent 5-year phase-in, as described in Section 1.6.C.4 (item #4 herein); instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time. In order to allow all tenants who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to only disabled persons is waived. The waiver and resulting alternative requirement only applies to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion, due to loss of employment; tenants that move into the property following conversion, etc.,) is covered by this waiver.

Pending HUD's approval of the FY2016 MTW Annual Plan Amendment #1, CHA will retain the EID rules under the Admissions and Continued Occupancy Policy (ACOP) for sites converting to RAD PBVs. Whereas the Housing Choice Voucher program limits the EID exclusion to persons with disabilities (24 CFR § 5.617(b)), for households residing in RAD PBV properties, EID exclusions may be applied to all qualifying adults, able-bodied and disabled, as defined in 24 CFR § 960.255 and will, in effect, waive section 5.617(b) for new tenants.
- 9. Under-Occupied Units.** If a household is in an under-occupied unit under 24 CFR 983.259 at the time of conversion, the household may remain in the unit until an appropriate-sized unit becomes available in the RAD property. When an appropriate sized unit becomes available in the RAD property, the household living in the under-occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Contract Administrator. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the RAD property, HUD has waived 24 CFR 983.259.
- 10. Waiting List Administration.** CHA will continue to use the community-wide (family) waitlist and site-based senior housing waitlist (as applicable) for RAD properties. For RAD properties where transfer of assistance will be utilized, CHA will notify existing waitlist applicants on how they can apply for any new properties with site-based waitlists. All newly established site-based waitlists will be prepared in accordance with all applicable civil rights, fair housing laws and regulations, and applicable court orders.

**11. Choice Mobility.** After completing a one-year residency requirement under the RAD program, households within RAD PBV units may request a tenant-based Housing Choice Voucher. CHA will provide tenant-based vouchers to the households that have requested them to the extent that they are available. Depending on the volume of households requesting a voucher, CHA reserves the right to provide no more than three-quarters of its turnover vouchers per year to eligible Choice-Mobility households.

*Certification of Consistency with Consolidated Plan*

**CERTIFICATION BY STATE OR LOCAL OFFICIAL OF THE PHA PLAN  
CONSISTENCY WITH THE CONSOLIDATED PLAN**

The City of Chicago's Consolidated Plan is developed through a collaborative process which includes the Chicago Housing Authority and several City departments. The Chicago Housing Authority continues to actively work with the City in the planning and coordinating of the City's development efforts in order to maximize affordable housing options.

I, Rahm Emanuel, the Mayor, certify that the Annual PHA Plan of the Chicago Housing Authority is consistent with the Consolidated Plan of the City of Chicago prepared pursuant to 24 CFR Part 91.



Signed by the Appropriate State or Local Official

# Certification for a Drug-Free Workplace

## Certification for a Drug-Free Workplace

U.S. Department of Housing and Urban Development

Applicant Name

Chicago Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving To Work Demonstration

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.)

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

PATRICIA EMANUEL

Signature

X *Patricia Emanuel*

Title

DIRECTOR OF HUMAN RESOURCES

Date

August 17, 2016

form HUD-50070 (3/98)  
ref. Handbooks 7417.1, 7475.13, 7485.1 & .3

measures may include, but are not limited to, written warning, counseling, oral reprimand, suspension, or dismissal of the employee engaging in such misconduct. A record of such disciplinary actions will be placed in the employee's personnel file.

#### **CONFIDENTIALITY**

Complaints of harassment, investigation of complaints of harassment, and any corrective action taken in response will be kept confidential to the extent possible.

#### **NO RETALIATION**

The CHA forbids any reprisal or retaliation against an employee for filing a good faith complaint of harassment or for supporting or assisting, in good faith, another employee in pursuing a complaint, or filing a discrimination charge. Anyone experiencing or witnessing any conduct he or she believes to be retaliatory should immediately report it to any of the individuals named above. The CHA will not retaliate or discriminate against any employee for exercising any rights under this policy. Retaliation is a violation of this policy.

#### **American with Disabilities (ADA)**

The CHA is committed to complying fully with the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act of 1973, and all other state, federal and local laws ensuring equal opportunity in employment for qualified persons with disabilities. We continually review our hiring and selection procedures to assure they are consistent with equal opportunity, and it is our policy to fully explore reasonable accommodations in accordance with the law to enable disabled individuals to safely and effectively perform their jobs. This policy is neither exhaustive nor exclusive.

Reasonable accommodation is available to all disabled employees, where their disability affects the performance of job functions. All employment decisions are based on the merits of the situation in accordance with defined criteria, not the disability of the individual.

The CHA is also committed to not discriminating against any qualified employees or applicants because they are related to or associated with a person with a disability. The CHA will follow any state or local law that provides individuals with disabilities greater protection than the ADA.

#### **Drug Free Environment**

The CHA is a Drug Free Work Place and its Policy on drug and alcohol use is one of "Zero Tolerance." Employees must not appear for work with the presence of alcohol or under the influence of alcohol or illegal non-prescribed drugs in their systems. Employees are prohibited from possessing alcohol or illegal non-prescription drugs. Employees who take prescribed drugs that affect their cognitive abilities should not report to work and should use appropriate leaves. Employees who violate this Policy will be terminated.

Employees are required to participate in drug and alcohol testing at a CHA designated testing facilities in the following circumstances:

1. Upon the CHA's making a conditional offer of employment.
2. Upon re-employment or return from any period of continuous absence of thirty (30) calendar days or more.
3. In instances where the employee has been involved in an automobile accident during the course of employment, regardless of whether the automobile is a CHA vehicle or the employee's vehicle and regardless of whether the employee is injured, the employee must submit to a medical evaluation which includes drug and alcohol testing as immediately after the accident as practical under the particular circumstances, but in no event later than twenty-four (24) hours after the accident.
4. In instances where the employee has suffered an alleged accident, regardless of whether the employee is injured or not, the employee must submit to a medical evaluation which includes drug and alcohol testing immediately after the accident or as soon as practical under the particular circumstances, but in no event later than twenty-four (24) hours after the accident.
5. In instances where the employee's supervisor has a reasonable suspicion that, the employee is at work under the influence of drugs and/or alcohol.

Employees who occupy safety sensitive positions will be subject to random or periodic drug testing.

The CHA drug and alcohol testing vendors are N.L.D.A. accredited. Drug and alcohol test results are confidential and are not disclosed to third parties by the CHA, except upon express written authorization of the employee or

as required by law. Employees who submit to drug and alcohol testing described above and whose test results show a positive result will be terminated. Employees who refuse to cooperate in the testing process will be terminated. Employees whose test results are positive may elect to have the sample re-tested at a different N.I.D.A. accredited laboratory at the employee's cost. Arrangements for re-testing must be made through the Director of Human Resources.

The CHA is committed to being a drug-free, healthful, and safe workplace. You are required to come to work in a mental and physical condition that will allow you to perform your job satisfactorily.

Under the Drug-Free Workplace Act, if you perform work for a government contract or grant, you must notify the CHA if you have a criminal conviction for drug-related activity that happened at work. You must make the report within five (5) days of the conviction.

If you have questions about this policy or issues related to drug or alcohol use at work, you can raise your concerns with your supervisor or the Human Resources Department without fear of reprisal.

### ***Immigration Law Compliance***

The CHA is committed to complying with the immigration laws that require we employ only citizens and others who are authorized to work in the United States. The CHA does not, however, discriminate on the basis of national origin.

In compliance with the Immigration Reform and Control Act of 1986, each new employee, as a condition of employment, must complete the Employment Eligibility Form I-9 and present documentation that establishes identity and employment eligibility. Former employees who are rehired must also complete the form if they have not completed an I-9 with the CHA within the past three (3) years, or if their previous I-9 is no longer retained or valid.

Employees may raise questions or complaints about immigration law compliance without fear of reprisal.

### ***Relationships in the Workplace***

When relatives or persons involved in a dating relationship work in the same area of an organization, it may cause problems at work. In addition to claims of favoritism and morale issues, personal conflicts from outside can sometimes carry over to work.

For this policy, we define a relative as any person who is related to you by blood or marriage, or whose relationship with you is similar to that of a relative. We define a dating relationship as a relationship that might reasonably be expected to lead to a consensual "romantic" relationship. This policy applies to all employees, regardless of their gender or sexual orientation.

Our policy is that an employee may not directly work for a relative or supervise a relative. We also discourage a person in a dating relationship to supervise or to report for that person. The CHA also reserves the right to take quick action if an actual or potential conflict of interest arises involving relatives or persons involved in a dating relationship who are in positions at any level (higher or lower) in the same line of authority that may affect the review of employment decisions.

If two employees become relatives, or start a dating relationship and one of them supervises the other, the acting supervisor is required to tell management about the relationship. The two employees are to decide which one of them is to be transferred to another available position. If they do not make that decision within thirty (30) calendar days, the CHA will decide who to transfer or, if necessary, terminate.

There may also be situations when there is a conflict or the potential for conflict due to employee relationships, even if there is no direct reporting or authority involved. In that case, we may reassign or terminate his/her employment. If you are in a close personal relationship with another employee, we ask that you avoid displays of affection or excessive personal conversation at work.

### ***Secondary Employment***

All CHA employees are prohibited from engaging in secondary employment unless the employee's Department Director and the Director of Human Resources approve the secondary employment in writing and such is



### **CHA Sites for Work Performance:**

1. Chicago Housing Authority  
60 E. Van Buren Street  
Chicago, IL 60605
  
2. Charles Hayes Family Investment Center (FIC)  
4859 S. Wabash Avenue  
Chicago, IL 60615
  
3. HCV Regional Office  
West Office  
2750 W. Roosevelt Road  
Chicago, IL 60608
  
4. HCV Regional Office  
South Office  
10 W. 35<sup>th</sup> Street  
Chicago, IL 60616



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