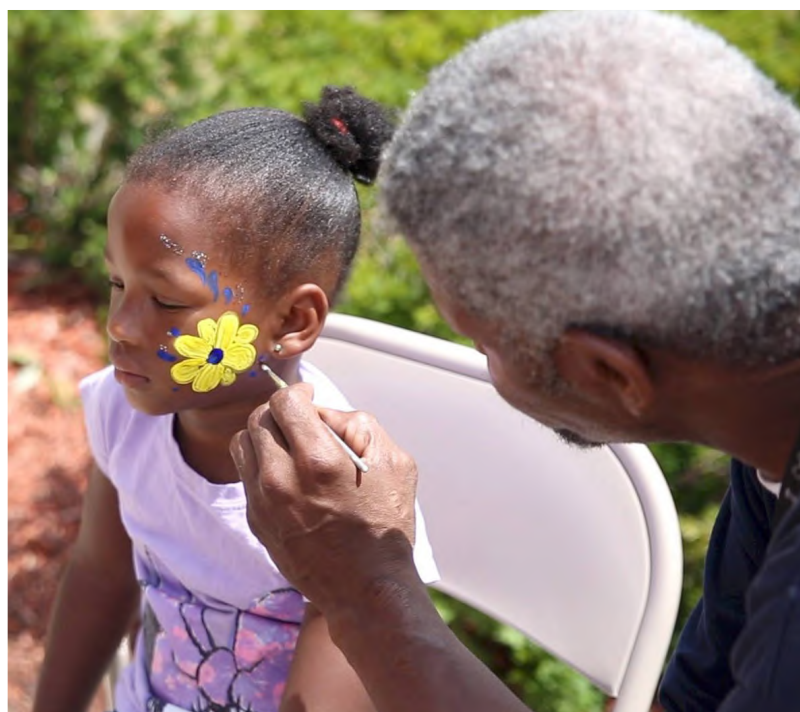




# DRAFT AMENDED FY2018 **MOVING TO WORK** ANNUAL PLAN



Original Submission: October 12, 2017  
HUD Approval: February 9, 2018  
Revised and Amended Plan Submitted: October 17, 2018

## **Message from CEO**

On behalf of the Chicago Housing Authority, I am pleased to present CHA's FY2018 MTW Annual Plan.

FY2018 marks a significant milestone for the CHA. From October 2017 – October 2018, CHA will celebrate its 80<sup>th</sup> anniversary. As we mark CHA's 80<sup>th</sup> anniversary, I am proud to announce that CHA will complete the original Plan for Transformation goal of rehabilitating or replacing 25,000 units of affordable housing in Chicago. Through CHA's investments, CHA residents now live in 75 of 77 of Chicago's 77 community areas rather than being isolated in pockets of poverty.

These achievements were only possible because of CHA's participation in the Department of Housing and Urban Development's Moving to Work (MTW) program. This designation not only provides CHA the financial flexibility to make investments in our residents and communities, but enables CHA to implement innovative 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.

By the end of FY2017, the remaining units to meet the 25,000 unit goal will be in progress or under construction. CHA will meet that goal in FY2018 through a combination of real estate acquisitions, project-based vouchers and the rehabilitation and construction of public housing units in communities throughout Chicago, including West Town, Logan Square, Humboldt Park, Irving Park, Rogers Park, Ravenswood, North Lawndale, Washington Heights and East Garfield Park. Meeting this goal does not mean that CHA's work is done; there is still a great need for affordable housing in Chicago and CHA will continue working with its partners to identify opportunities for housing. Throughout FY2018, CHA will also continue its progress on redevelopment at Cabrini, Lathrop, Horner, Ickes and ABLA/Roosevelt Square. I will also work to ensure the high-quality of CHA's existing housing stock by beginning or continuing work on 11 capital projects across CHA's portfolio, including renovations at CHA's scattered site properties and upgrades and life safety improvements at CHA senior properties.

CHA's investment in its residents is just as important as its investment in property. As an MTW agency, CHA has been able to create programs that increase resident self-sufficiency and streamline processes for the benefit of residents while promoting efficiency and cost savings. In FY2018, CHA is proposing to modify four existing MTW activities to provide incentives for residents to participate in CHA's self-sufficiency program; increase housing options for people with disabilities; provide HCV residents with greater access to thriving communities; and extend the length of PBV contracts to ensure long-term preservation of affordable housing options.

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

## Table of Contents

Section I: Introduction .....	5
Section II: General Housing Authority Operating Information.....	12
Section III: Proposed MTW Activities: HUD Approval Requested.....	32
Section IV: Approved MTW Activities: HUD Approval Previously Granted .....	40
Section V: MTW Sources and Uses Funds .....	73
Section VI: Administrative .....	81
Appendices.....	133
<i>CHA Local Asset Management Plan</i> .....	134
<i>CHA - Affirmatively Furthering Fair Housing</i> .....	136
<i>Rental Assistance Demonstration Program</i> .....	138
<i>Certification of Consistency with Consolidated Plan</i> .....	147
<i>Certification for a Drug-Free Workplace</i> .....	148



# Section One **INTRODUCTION**



**CHA**

CHICAGO HOUSING  
AUTHORITY™

## **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. All MTW Agreements were subsequently extended until 2028 pursuant to Congressional action.

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 FY2018, CHA will continue to pursue and/or plan for future implementation of the following 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.
- **Real Estate Acquisition Program (REAP):** CHA will continue its strategy to acquire public housing units primarily in Opportunity Areas.

- 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 will continue to support 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.
- Choose To Own Homeownership Program: CHA will continue to facilitate 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 will continue to work with private owners of existing 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.

By the end of FY2017, the remaining units to meet the 25,000 unit delivery goal will be in progress or under construction. During FY2018, CHA plans to achieve the 25,000 unit delivery goal of the original Plan by delivering an additional 808 housing units, for an overall total of 25,182 housing units or 101% of the overall unit delivery goal. <sup>1</sup> (Please refer to Section II and IV for more information.)

Projected FY2018 Unit Delivery

IL Number	Type	Development/Program	Projected FY2018 Unit Delivery
TBD	Mixed-Income Housing Redevelopment	Taylor Street Library and Apartments, 1340 W. Taylor	37
TBD	Public Housing Acquisition	Real Estate Acquisition Program (REAP)	25
N/A	Property Rental Assistance (PRA) Program	Project-Based Vouchers	442
N/A	RAD2/Moderate Rehabilitation Conversions	Project-Based Vouchers	100
N/A	RAD	Project-Based Vouchers	204
<b>Total Housing Units</b>			<b>808</b>

### Rental Assistance Demonstration (RAD) Program

In October 2013, CHA submitted a portfolio application to HUD to utilize RAD to provide a more consistent budgeting platform to support long-term operation and affordability of CHA public housing units. CHA elected to transition the proposed public housing 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

<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.

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 requirements of the RAD program and PBV regulations, 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. Since then, CHA has closed multiple transactions with more than 2,000 units converted to RAD in 2016 and nearly 1,000 more in FY2017. In FY2018, CHA will continue to move forward with the RAD PBV conversion for the entire portfolio application.

### Proposed MTW Activities in FY2018

In FY2018, CHA is proposing the following MTW activities.

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

Modified Family Self-Sufficiency (FSS) Program for HCV and Public Housing (2014-01): CHA is proposing a modification to FSS escrow savings accrual from the traditional escrow calculation based on increased earnings to an incentive savings model in which participants accrue escrow by achieving specific milestones or activities associated with a pay points.

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

- Increased Payment Standards at Interims: CHA proposes to implement an activity to increase payment standards at Interims for elderly/disabled households and others who receive a rent increase. Because elderly and disabled households are on a triennial reexamination schedule, it is likely that the Fair Market Rent used to determine their subsidy amount is outdated and does not reflect the current costs of housing in Chicago.
- Income Calculation Hardship Exemption: CHA proposes to implement a hardship exemption for heads of households who are making required child support payments that hinder their ability to pay their monthly rent portion.
- Modified Exception Payment Standards/Altering Mobility Area Map (2010-02): CHA is authorized to implement exception payment standards (EPS) 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 EPS to no more than 150% of HUD FMR for all new requests with phase out of existing exception payments. CHA now proposes increasing the current limit from 150% FMR to 250% in cases where it's needed as a Reasonable Accommodation. CHA also proposes changing the areas eligible for EPS from Opportunity Areas to Mobility Areas that will be based on community areas rather than census tracts.

#### ***Project Based Voucher Program.***

- PBV Contract Commitments with 21-40 Year Initial Terms with Extension Option (2011-05): CHA is requesting MTW authority enter into initial PBV contracts of 21-40 years or an aggregate term not to exceed 40 years with an extension.

### Approved MTW Activities in FY2018

In FY2018, 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 is authorized 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 promote participant success.
- Triennial Re-examinations for Households with Only Elderly/Disabled Participants for HCV and Public Housing (2014-02): In FY2014, CHA received HUD approval 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 has implemented a Re-entry Pilot Program for up to 50 eligible participants who are reuniting with a family member currently living in CHA 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 has implemented 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 has implemented biennial re-examinations for public housing households in FY2017 and will continue to conduct biennial re-examinations for HCV 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 new communities.



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

- Owner Excellence - Acceptance of Passed Annual or Initial HQS Inspection for New Request for Tenancy Approval (RTA) 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 RTA received.
- HCV Vacancy Payments (2011-03): As part of the HCV Inspection Excellence Program (formerly the Owner Excellence Program), CHA may provide a modest vacancy payment to eligible owners participating in the Inspection Excellence Program who re-lease an eligible unit currently in the HCV program to another HCV participant.
- Elimination of Assets in Income Calculation after Initial Eligibility for HCV Program (2017- 01): CHA has reinstated 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 Mobility Areas (2017- 02): In FY2017, CHA received approval 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 a Mobility Area.
- Time Limit Demonstration Program for Housing Choice Voucher Participants (2017- 03): CHA is authorized to implement an eight-year time limit demonstration program for a total of 100 families.

### ***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.
- 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): CHA has retained 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): CHA has continued to utilize 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): CHA may exceed the FMR cap of 110% for RAD PBV properties, as needed, to retain existing subsidy levels.

### ***Local Programs***

- Funding for City of Chicago Housing Assistance Programs (2017- 04): CHA is implementing 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.

Finally, in FY2018, 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**



**CHA**

CHICAGO HOUSING  
AUTHORITY™

**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 FY2018**

The following table summarizes planned new public housing units in FY2018.

**Planned New Public Housing Units to be Added During FY2018**

AMP Name and Number	Bedroom Size							Total Units	Population Type	Fully Accessible	Adaptable
	0	1	2	3	4	5	6+				
IL TBD Upon Closing Taylor Street Library and Apartments, 1340 W. Taylor	0	20	17	0	0	0	0	37	General	2	6
Real Estate Acquisition Program (REAP)	0	13	12	0	0	0	0	25	General	2	4
<b>Total Public Housing Units to be Added</b>								<b>62</b>			

***Overview of New Public Housing Units in FY2018*****Taylor Street Library and Apartments, 1340 W. Taylor Street (IL# to be assigned upon closing)**

As part of the Roosevelt Square mixed-income development, CHA and its development partner plan to close and start construction in FY2018 on a new mixed-use development at 1340 W. Taylor Street. The development plans include a first-floor public library with approximately 73 new housing units above for 37 public housing, 29 affordable and 7 market rate families. Of the 37 public housing units projected for delivery in FY2018, 2 will be fully accessible and 6 will be adaptable.

**Real Estate Acquisition Program Unit Delivery in FY2018**

Under the Real Estate Acquisition Program (REAP), CHA seeks 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 25 new public housing units through REAP in FY2018.

***Dwelling Demolition***

CHA is considering the following demolition activity for FY2018. Other demolition activity previously proposed in annual plans may be carried out in FY2018.

Scattered Sites

CHA is proposing the demolition of 12 units 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 FY2018**

<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	6	The property located at 420 W. North Ave. was assessed for rehabilitation, but the costs to return units to viability exceed current limits. This property is located in an Opportunity Area and the CHA plans to demolish in FY2018 and hold for possible redevelopment.
IL002032000 Scattered Sites North East	6	The property located at 430 W. North Ave. was assessed for rehabilitation, but the costs to return units to viability exceed current limits. This property is located in an Opportunity Area and the CHA plans to demolish in FY2018 and hold for possible redevelopment.
<b>Total Number of Units to be Removed</b>	<b>12</b>	

***Non-Dwelling Demolition***

<b>IL Number</b>	<b>Development</b>	<b>Non-Dwelling Address</b>	<b>Justification for Non-Dwelling Demolition</b>
IL002031000 Scattered Sites North East	Scattered Sites	2610 W. North Ave.	The property located at 2610 W. North Ave. is a vacant two-story office building with significant structural issues. The CHA plans to demolish the building and is still evaluating its future use.
IL002092000	William Green Homes	Near North High School 1450 N. Larrabee	The property located at 1450 N Larrabee St is the site of the old Near North High School building. The site is in the Cabrini Green DZP Plan and is part of the Phase I-Site 1 redevelopment effort. The CHA plans to demolish the building for future residential and commercial development.

Project-Based Voucher Utilization in FY2018

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 and unlike tenant-based vouchers, remain with the unit if a tenant moves out.

**PRA / HAP Developments.** CHA, through its Property Rental Assistance Program, invests in privately owned rental housing throughout the City of Chicago to create affordable housing opportunities. It is anticipated that a total of 4,645 PBVs will be under agreement as of December 31, 2018. This includes 341 units under a City / State partnership; 1,769 units for families and seniors; 2,073 units of supportive housing; 393 units that have been preserved as affordable due to conversion of a Mod-Rehab HAP; and 69 units that were approved by Regional Housing Initiative (RHI) and that are located in the City of Chicago. There will be an additional 173 units that were approved by RHI that are located outside of the City of Chicago.

During FY2018 it is anticipated that a total of 542 newly created units will provide housing opportunities for 126 family/ senior households, 316 supportive-housing households and 100 units preserved as affordable due to conversion of a Mod-Rehab HAP. By year end, it is anticipated that an additional 255 units will be under an Agreement to enter into a Housing Assistance Payments (AHAP) contract.

**RAD Developments.** CHA utilizes HUD-funded Rental Assistance Demonstration to create new housing opportunities in the City of Chicago. During 2018, it is anticipated that 204 newly-created affordable housing units for CHA families will be delivered utilizing RAD.

***New Housing Choice Vouchers to be Project-Based in FY2018***

The following table provides an overview of the 542 new project-based vouchers planned to be under PRA/RAD2 HAP, 204 new units planned for RAD PRA development, and 255 new units planned to be under AHAP contracts in FY2018.

Property Name	FY2018 Anticipated Number of New Vouchers to be Project-Based	Description of Project
<b>PRA /RAD2 HAP Developments:</b>		
Brainerd Park Apartments	9	35 total units of new construction housing for families in the Washington Heights community.
Lawson House	100	Conversion of Mod-Rehab to RAD2 vouchers in 583-unit SRO building in the Near North Side community.
Mark Twain Apartments	126	Redevelopment and preservation of affordable housing in former SRO property containing 148 total units in the Near North Side community.
The Marshall Hotel	90	Redevelopment and preservation of affordable housing in former SRO property containing 90 total units in the Near North Side community.
Pullman Artspace Lofts	6	38 total units of new construction housing for families in the historic Pullman community.
Tierra Linda Apartments	11	45 total units of new construction housing for families in scattered sites located in the Logan Square, Humboldt Park and West Town communities
TBD: Additional 100 PRA & 100 Mod Rehab Conversions to PBV	200	PRA has an open application process and proposals are anticipated in General and Opportunity Areas.
<b>RAD Developments</b>		
Independence	30	New mixed-use development at 4022 N. Elston Avenue in the Irving Park community. This RAD project-based voucher subsidized development

CHA Proposed Amended FY2018 MTW Annual Plan – Submitted to HUD on May 23, 2018

**Section II: General Housing Authority Information**

		includes a first-floor public library with approximately 44 new housing units above for 30 CHA and 14 affordable families. Of the 30 CHA units projected for delivery in FY2018, 2 will be fully accessible and 5 will be adaptable.
Lathrop Phase 1A	129	During FY2018, a total of approximately 354 housing units will be under construction for Phase 1A, including 129 CHA , 79 affordable and 146 market rate units. This RAD project-based voucher subsidized development is projected to deliver 129 CHA units in FY2018, including 11 fully accessible and adaptable.
Northtown	30	This RAD project-based voucher subsidized development includes a first-floor public library with approximately 44 new housing units above, including 30 CHA and 14 affordable units. Of the 30 CHA units projected for delivery in FY2018, 2 will be fully accessible and 5 will be adaptable.
Ravenswood Senior Living	15	This RAD project-based voucher subsidized development will create 74 new housing units for 74 CHA senior residents. Of the 74 CHA units, 15 are projected for delivery in FY2018, of which 1 will be fully accessible and 3 will be adaptable.
<b>AHAP Developments:</b>		
Rogers Park Permanent Supportive Housing	13	Preservation of 13 supportive housing units for individuals and families with disabilities in the Rogers Park community.
5150 Northwest Apartments	20	100 total units of new construction, family housing in the Jefferson Park community. <i>(Note: Up to 30 units have received preliminary approval.)</i>
Clark Estes Apartments	15	54 total units of new construction family housing in the Rogers Park community.
Lincoln Park Community Shelter – PSH	20	20 new construction supportive housing units for formerly homeless individuals in the Near North Side community.
Montclare Veteran’s Village	75	78 total units of new construction family housing for veterans utilizing VASH vouchers.
Roosevelt Road Veteran’s Housing	75	100 total units in new construction family housing for veterans utilizing VASH vouchers.
Sarah’s Circle Apartments	18	38 new supportive housing units for formerly homeless women in the Uptown community.
Warren Apartments	19	70 total units of new construction, family housing in the Near West Side community.
<b>Anticipated Total New Units to be Project-Based (HAP)</b>		<b>542</b>
<b>Anticipated Total New Units to be Project-Based (RAD)</b>		<b>204</b>
<b>Anticipated Total New Units to be under Agreement to enter into Housing Assistance Payments (AHAP) contract</b>		<b>255</b>

**Anticipated Total Number of Chicago Project-Based Vouchers Committed at the End of the Fiscal Year (under HAP / RAD Contract)**

**4,849**

**Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year**

**4,364**



**Anticipated Total Number of Project-Based Vouchers  
Made Available Outside the City of Chicago through (RHI) (not counted  
towards unit delivery)**

173
-----

#### Project-Based Vouchers(PBV)/Property Rental Assistance (PRA) Program

Throughout FY2018, 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 Property Rental Assistance (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.

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 FY2018, CHA expects an additional 316 new supportive PBV units under HAP contracts to be counted toward unit delivery. By the end of FY2018, CHA anticipates a total of 2,073 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 FY2018, 126 non-supportive family/senior PBV units are expected to be placed under HAP contracts to be counted toward unit delivery with an additional 255 PBV units to be identified and committed during the year and issued AHAP contracts. CHA anticipates a total of 1,769 non-supportive family/senior housing (non-RHI) PBV units counted toward overall unit delivery by the end of FY2018.

#### 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

CHA Proposed Amended FY2018 MTW Annual Plan – Submitted to HUD on May 23, 2018

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 FY2018, CHA will maintain its participation in the RHI Pilot Program in order to offer applicants on CHA's wait list broader housing alternatives in Opportunity Areas.

By the end of FY2018, a total of 242 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 1,233 units in its Moderate Rehabilitation (Mod Rehab) portfolio. Mod Rehab, similar to PRA, provides property-based rental assistance to low-income households but is governed by separate regulations. These Mod Rehab units are not available to CHA wait list applicants. CHA continues to work with the properties benefitting from the Mod Rehab program and will process applications to CHA's PRA/PBV portfolio either through RAD conversions or the standard PRA/PBV selection process.

In FY2018, CHA anticipates that an additional 100 Mod Rehab units will be converted. A total of 393 Mod Rehab units plan to be converted to RAD2 or standard PRA/PBV by year end.

#### Project-Based Vouchers / Rental Assistance Demonstration (RAD)

Utilizing Component 1 of HUD's Rental Assistance Demonstration (RAD) program, four developments with a total of 285 RAD PBV units will be under construction in 2018 and CHA plans to deliver a portion of those units in FY2018. The first 204 RAD PBV units are planned for delivery in FY2018 and the remaining 81 RAD PBV units are planned for delivery in the following year.

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

In FY2018, CHA projects a total of 542 new PBV units under HAP contracts in Chicago to be counted toward unit delivery, including 316 supportive housing units, 126 non-supportive family/senior housing units and 100 Mod Rehab conversions. An additional 204 RAD PBV units will also be counted toward unit delivery. By the end of FY2018, CHA expects to have a total of 4,849 PBV units in Chicago counted toward unit delivery progress with an additional 173 PBV units under a HAP contract and located outside City of Chicago limits. Additionally, it is anticipated that CHA will have 255 units under an AHAP contract by year end.

#### Other Changes to the Housing Stock Planned in FY2018

The following section describes planned changes to CHA's housing stock during FY2018 by category, including Disposition Activity, Long-term Plan for Offline Units, Additional Capital Maintenance Activity and Additional Redevelopment Activity.

---

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

## Other Changes to the Housing Stock Planned in FY2018

***Planned Disposition Activity***

CHA plans to dispose of vacant land for future redevelopment for the ABLA, Altgeld Gardens, Cabrini, Horner, Former Robert Taylor Homes, the Former Lawndale Complex, Former Stateway Gardens, Former Rockwell Gardens, Scattered Sites Edith Spurlock Sampson, Washington Park Homes and Wicker Park Apartment communities.

***Long-term Plan for Offline Units Status***

As of Q4 2017, CHA has 980 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.

***Additional Planned Capital Maintenance Activity***

CHA will continue or begin various capital maintenance projects in FY2018.

***Additional Planned Redevelopment Activity***

CHA will continue redevelopment planning at several sites and anticipates several financial transaction closings in FY2018.

***Planned Disposition Activity***

The following disposition activity is planned for FY2018. Other disposition activity previously included and approved in annual plans may also be carried out in FY2018.

IL Number	Development/ Site	Northern Boundary	Southern Boundary	Eastern Boundary	Western Boundary	Type of Disposition (Ground Lease, Fee Simple, Land Swap etc.)	Description of FY2018 Activity This should include justification, detailed info on purpose, number of units (if applicable), indicate vacant land (if applicable).
IL002023	ABLA	Roosevelt Road	13 <sup>th</sup> Street	Loomis	Ashland Avenue	Land Transfer, Fee Simple and/or Ground Lease	In FY2018, CHA plans to convey land for a new community facility.
IL002089 000	Cabrini Green	Oak Street	Locust Street	Cambridge Avenue	Larrabee Street	Fee Simple and/or Ground Lease	In FY2018, CHA plans to ground lease or sell land for the development of residential, mixed-use, commercial or other land uses.
IL002156	Henry Horner Homes (may be in a previous plan)	Lake Street	Washington Street	Wolcott Avenue	Damen Avenue	Fee Simple and/or Ground Lease	In FY2018, CHA plans to ground lease or sell land for the development of residential, mixed-use, commercial or other land uses.

## Section II: General Housing Authority Information

IL002037 000	Robert Taylor	44 <sup>th</sup> Street	47 <sup>th</sup> Street	State Street	Metra Railway	Fee Simple and/or Ground Lease	In FY2018, CHA plans to ground lease or sell land for the development of mixed-use, commercial or other land uses.
IL002037 000	Robert Taylor	47 <sup>th</sup> Street	51 <sup>st</sup> Street	State Street	Metra Railway	Negotiated Sale, Fee Simple and/or Ground Lease	In FY2018, CHA plans to ground lease or sell land for the development of mixed-use, commercial or other land uses.
IL002002 000	Altgeld Gardens	130 <sup>th</sup> Street	131 <sup>st</sup> Street	Evans Avenue	St. Lawrence Avenue	Land Transfer, Fee Simple and/or Ground Lease	In FY2018, CHA plans to convey land for the development of commercial or other land uses.
IL002222 222	Rockwell Gardens	Madison Avenue	Adams Street	Western Avenue	Rockwell Street	Fee Simple, Ground Lease, and/or long term license agreement	In FY2018, CHA plans to ground lease or sell land for the development of residential, mixed-use, commercial or other land uses.
IL002222 222	Stateway Gardens	36 <sup>th</sup> Street	Pershing Road	State Street	Metra Railway	Negotiated Sale, Fee Simple and/or Ground Lease	In FY2018, CHA plans to ground lease or sell land for the development of residential, mixed-use, commercial or other land uses.
IL002091 000	Cabrini	North Clybourn Avenue	West Evergreen Avenue	N/A	Ogden Avenue	Fee Simple	In FY2018, CHA plans to dispose of vacant property for market value.
IL002039 000	Washington Park Homes	61 <sup>st</sup> Street	63 <sup>rd</sup> Street	Martin Luther King Drive	Calumet Avenue	Fee Simple	In FY2018, CHA plans to dispose of vacant property for market value.
	Vacated Alley near Addams/ Medill Park	Roosevelt Road	15 <sup>th</sup> Street	South Loomis Street	Ashland Avenue	Fee Simple	In FY2018, CHA plans to dispose of vacant property for market value.
IL002091 000	Cabrini	Oak Street	Chicago Avenue	Hudson Avenue	Larrabee Street	Fee Simple, Ground Lease, and/or long term license agreement	In FY2018, CHA plans to ground lease or sell land for the development of residential, mixed-use, commercial or other land uses.
IL002001 000	ABLA	13 <sup>th</sup> Street	N/A	Blue Island	Racine	Fee Simple, Ground Lease, and/or long	In FY2018, CHA plans to ground lease or sell land for the development of residential, mixed-use,

## Section II: General Housing Authority Information

						term license agreement	commercial or other land uses.
IL002002000	Altgeld Gardens	131 <sup>st</sup> Street	132 <sup>nd</sup> Street	South Ellis	South Ingleside	Land Transfer, Fee Simple and/or Ground Lease	In FY2018, CHA plans to convey land for the development of commercial or other land uses.
	Edith Spurlock	Property commonly known as 2640-2720 North Sheffield				Ground Lease	In FY2018, CHA plans to support rehabilitation of two residential buildings which will remain 100% senior subsidized units and the possible development of more units and/or a mixed-use project. Financing may require a ground lease.
	Wicker Park	1414 North Damen Avenue				Ground Lease	In FY2018, CHA plans to support rehabilitation of two residential buildings which will remain 100% senior subsidized units and the possible development of more units and/or a mixed-use project. Financing may require a ground lease
IL002035000	Scattered Sites West	1469 E. 69 <sup>TH</sup> Street				Fee Simple	In FY2018, CHA plans to dispose of a vacant two-unit building. Rehabilitation costs would exceed current limits. Not in CHA Opportunity Area.
IL002157000	PII North Region	2956 N. Oak Park				Negotiated Sale, Fee Simple and/or Ground Lease	In FY2018, CHA plans to dispose of a vacant two-unit building. Rehabilitation costs would exceed current limits.
IL002222222	Rockwell Gardens	150 South Western				Fee Simple and/or Ground Lease	In FY2018, CHA plans to ground lease or sell land for the development of residential, mixed-use, commercial or other land uses.

## Section II: General Housing Authority Information

	Scattered Sites	6349 South Ellis Avenue	Fee Simple	In FY2018, CHA plans to dispose of vacant property for market value.
	Scattered Sites	6405 South Ellis Avenue	Fee Simple	In FY2018, CHA plans to dispose of vacant property for market value.
	Scattered Sites	6553 South Ellis Avenue	Fee Simple	In FY2018, CHA plans to dispose of vacant property for market value

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

As of 4<sup>th</sup> quarter 2017, CHA has 980 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 Q4 2017.

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

A significant number of units are offline due to pending redevelopment plans, primarily at 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.

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

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 excluded the Frances Cabrini Rowhouses from its target area.

Under the FY2017 CHA MTW Annual Plan, CHA proposed to demolish the Frances Cabrini Rowhouses and commenced the Environment Assessment (EA) and environmental studies of the site. CHA completed initial EA research that highlighted the Rowhouses eligibility for designation as a historic property. Consequently, in FY2018 CHA will work with the Illinois Housing Preservation Agency (IHPA) and the Chicago Department of Facilities and Fleet Management (2FM) and other stakeholders to determine CHA's redevelopment activities at the property in compliance with an existing Memorandum of Agreement and Court Order regarding development of this site.

### ***Lathrop Homes – 321 offline units (IL002022000)***

CHA remains committed to deliver 400 family units on-site at Lathrop Homes through a combination of historically preserved housing, new housing, retail and other amenities in a mixed-income community. CHA and its development partner initiated construction on Lathrop Phase 1A in October 2017. A total of approximately 354 housing units will be completely rehabilitated in FY2018, including 129 for CHA, 79 affordable and 146 market rate. Of the 129 CHA units, 11 will be fully accessible and 35 will be adaptable. CHA is working to create off-site units in accordance with the Lathrop Homes Agreed Court Order.

CHA Proposed Amended FY2018 MTW Annual Plan – Submitted to HUD on May 23, 2018

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 FY2018, a total of twelve major capital projects will continue or begin. The following is a summary of major capital projects for FY2018.

FY2018 Major Capital Projects				
IL Number	Project/Site	Construction Start	Units Back Online/Available for Leasing	Project Description
IL002078000	Minnie Riperton Apartments	May 2014	March 2018	Enhanced new life safety features (sprinklers, elevator controls and interior cameras), replacement of plumbing risers, kitchens, and baths
IL0020086000	Major Robert Lawrence Apartments	May 2014	March 2018	Enhanced new life safety features (sprinklers, elevator controls and interior cameras), replacement of plumbing systems, kitchens, and baths
IL002076000	Caroline Hedger Apartments	July 2014	May 2018	Enhanced new life safety features (sprinklers, elevator controls and interior cameras), replacement of mechanical, electrical and plumbing systems, kitchens, and baths and façade improvements
IL002093000	Henry Horner Town Homes Annex	April 2017	October 2018	Modernization to all interior finishes, mechanical, electrical and plumbing systems and implement accessibility upgrades
IL002035000	Congress Parkway Apartments	July 2017	November 2018	Modernization to all interior finishes, mechanical, electrical and plumbing systems and enclosure of exterior corridors and vestibules
IL002059000	Schneider Apartments	September 2018	September 2019	Selective envelope and HVAC repairs. Upgrades to public area amenities and finishes.
IL002063000	Las Americas Apartments	November 2018	November 2019	Selective envelope and HVAC repairs. Upgrades to public area amenities and finishes.
IL002052100	Lincoln Perry Apartments/Annex	November 2018	November 2019	Mechanical system modernization; Enhanced new life safety features
IL002064000	Lorraine Hansberry Apartments	November 2018	December 2019	Selective envelope and HVAC repairs. Upgrades to public area amenities and finishes.



## Section II: General Housing Authority Information

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
IL002057000	Judge Fisher Apartments	March 2015	July 2018	Enhanced new life safety features (sprinklers, elevator controls and interior cameras), replacement of plumbing risers, kitchens, and baths
IL002057000	Judge Fisher Apartments	December 2017	August 2018	Replacement of remaining roof systems and exterior envelope repairs

### Units pending demolition/disposition

Units in this category are pending demolition or disposition and will not come back online. As of the 4th quarter of FY2017, there are zero units in the approved “demo/dispo” category in PIC.

### Units used for non-dwelling purposes

As of 4th quarter of FY2017, CHA currently uses only 216 units for non-dwelling purposes. CHA continues to evaluate non-dwelling use of units across its portfolio.

### ***Additional Planned Capital Maintenance Activity in FY2018***

CHA will continue or begin the following projects in FY2018:

- 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.
- Conversion of existing Pope Elementary School into CHA office space and housing.
- Renovations to the Gautreaux Child Care Center, Carver Park Field House and CYC Building within the Altgeld Murray Homes community.
- Construction of a New Library and Community space within the Altgeld Murray Homes community.
- Renovations to the Maintenance Building and Community Center within the Trumbull Park Community
- Continuation 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).
- Continuation of the renovation of a non-dwelling facility located at 1000 N. Sedgwick
- Installation of new trash enclosures and lift, and sewer repairs at Dearborn Homes

### ***Additional Planned Redevelopment Activity in FY2018***

#### 4630 S. Ashland (IL# to be assigned upon closing)

In FY2018, CHA plans to participate in the real estate transaction for a mixed-use development at 4630 S. Ashland in the New City community area. This development is expected to deliver approximately 60 new housing units, including 24 for CHA and 36 for affordable units. Of the 24 CHA units projected for delivery in FY2018, 2 will be fully accessible and 4 will be adaptable.

Altgeld Gardens-Murray Homes Community Facility

In FY2018, CHA plans to participate in a real estate transaction to create a new community facility at the Altgeld Gardens and Murray Homes public housing developments. The new center will include a state licensed child care program, community and library spaces.

Cabrini Green

In FY2017, CHA awarded development teams for two Phase I sites under the Cabrini Green Development Zone Plan. CHA and its selected development partners plan to obtain the necessary approvals to initiate construction on these parcels in FY2019.

Concord at Sheridan

The development team began construction in October 2017 on a new mixed-income, mixed-use development at 6418 N. Sheridan in Rogers Park, adjacent to the CHA senior property, Caroline Hedger Apartments. This RAD project-based voucher subsidized development includes approximately 30,000 square feet of first-floor retail, including a Target department store and 111 new housing units— 65 for CHA and 46 market rate units. Of the 65 CHA units, 4 will be fully accessible and 10 will be adaptable.

Diversey Manor (IL002022000MP3)

In October 2017, the development team commenced construction on Diversey Manor Apartments at 5525 W. Diversey Avenue in Belmont Cragin. This RAD project-based voucher subsidized development will offer 98 new rental apartments—45 CHA units and 53 affordable units. Of the 45 CHA units, 3 will be fully accessible and 7 will be adaptable.

Harold Ickes Homes (IL002016000)

CHA selected a development team to redevelop the former Ickes site as a mixed-income, mixed-use development, including CHA family units and other residential, commercial, institutional, and recreational components to provide a minimum of 200 units for CHA families. Phase I is expected to deliver approximately 196 total new rental apartments consisting of 63 CHA, 36 affordable and and 97 market rate units.

- Ickes Phase 1 – 4% Transaction - The development team plans to close and start construction in FY2018 on the first phase of Ickes replacement housing. This RAD project-based voucher subsidized development will create approximately 100 new rental apartments for 32 CHA, 18 affordable and 50 market rate families. Of the 32 CHA units projected for delivery, 2 will be fully accessible and 5 will be adaptable.
- Ickes Phase 1 – 9% Transaction -The development team plans to close and start construction in FY2018 on the second real estate transaction for Ickes Phase 1. This RAD project-based voucher subsidized development will create approximately 96 new rental apartments, including 31 CHA, 18 affordable and 47 market rate units. Of the 31 CHA units projected for delivery, 2 will be fully accessible and 5 will be adaptable.

Henry Horner Superblock (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. CHA continues its efforts to create off-site housing in accordance with the Horner Agreed Order.

John Pennycuff Memorial Apartments (IL002022000MP4)

In December 2017, the development team closed and started construction on John Pennycuff Memorial Apartments at 2037 N. Milwaukee Avenue. This RAD project-based voucher subsidized development will create approximately 88

new rental apartments for 47 CHA and 41 affordable families in the Logan Square community. Of the 47 CHA units projected for delivery in FY2019, 3 will be fully accessible and 8 will be adaptable.

Lakefront Properties Phase II For Sale Development

CHA and its development partner plan to initiate construction on the Sullivan Station for sale development as part of the Lakefront Properties Phase II redevelopment activities. The new homeownership units will be dispersed among the 12 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.)

Lathrop Homes Phase IB

CHA and its development team plan to close and start construction in FY2018 on the second phase of Lathrop Homes redevelopment to provide approximately 217 total new housing units, including 77 CHA, 48 affordable and 92 market rate units.

Lawndale Complex/Ogden Courts

In FY2017, CHA selected a development team for the remaining undeveloped land formerly known as Lawndale Complex and Ogden Courts. In FY2018, CHA and its development partner plan to work together to advance plans for a new mixed-use, mixed-income development at the Lawndale Complex redevelopment site by commencing construction on a new commercial building.

LeClaire Courts

CHA plans to select a development partner in FY2018 and advance plans for a new mixed-use, mixed-income development at the former LeClaire Courts site.

Logan Square TOD project (IL# to be assigned upon closing)

In FY2018, CHA plans to participate with the development team to close and start construction on a new mixed-income development at 2630 N. Emmett Street in Logan Square. This RAD project-based voucher subsidized development will provide approximately 100 total new housing units including 41 for CHA and 59 affordable families. Of the 41 CHA units projected for delivery in FY2019, 2 will be fully accessible and 6 will be adaptable.

Oakwood Shores – Phase IC For Sale

In FY2018, CHA plans to convey land for the Oakwood Shores Phase IC for sale development as part of the Madden Park, Ida B. Wells, Darrow Homes revitalization activities. The new homeownership units will be dispersed across the Oakwood Shores revitalization site.

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

CHA continues to work with its development partner to close and commence construction on a new rental phase as the residential component of the Quad Communities Arts & Recreation Center development. 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. This phase will create approximately 48 new mixed-income housing units, including approximately 16 CHA units. Of the 16 CHA units, 1 will be fully accessible and 3 will be adaptable.

Olso Apartments (IL# to be assigned upon closing)

The development team plans to close and start construction in FY2018 on Olso Apartments at 3441 W. Montrose in the Albany Park. This RAD project-based voucher subsidized development is planned to create approximately 50 new rental apartments including 29 CHA units and 21 affordable units. Of the 29 CHA units, 2 will be fully accessible and 5 will be adaptable.

CHA Proposed Amended FY2018 MTW Annual Plan – Submitted to HUD on May 23, 2018

Park Boulevard

CHA plans to convey land for the next phase of Park Boulevard as part of the Stateway Gardens revitalization activities. CHA's development partner plans to commence construction on new for sale housing in FY2018. During the same time period, CHA plans to participate with the developer in a real estate transaction to create new rental housing units.

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

In FY2018, CHA plans to participate in a real estate transaction for Phase III at Parkside of Old Town, which is expected to provide a total of 190 mixed-income housing units including 54 public housing rental units, 44 affordable units and 92 market rate homeownership units. Phase III is the final phase of Parkside of Old Town, which is part of Cabrini North Extension replacement housing. Of the 54 CHA units, 3 will be fully accessible and 8 will be adaptable.

Pullman Community Center

CHA is partnering with the Chicago Park District and the Chicago Neighborhood Initiative in the creation of a new recreation facility. The new Pullman Community Center will provide recreational services to CHA families in the Roseland neighborhood and surrounding Southside area. The center is expected to be completed in FY2018.

Robert Taylor Homes

In FY2018, CHA plans to dispose of land formerly part of the Robert Taylor Homes for a new development that may include mixed-use, commercial and/or other uses. Additionally, 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.

Roosevelt Square/Former ABLA Homes

CHA completed master planning activities in FY2015 and adopted the FY2015 Roosevelt Square Framework Plan for the remaining undeveloped land at the former ABLA Homes site. CHA and its development partner, Related Midwest, plan to create 50 new for-sale units contemplated as part of the HOPE VI Revitalization Program. Additionally, plans are underway to commence construction on the Taylor Street Apartments mixed-use building in Q1 2018. Furthermore, CHA continues to work with the National Public Housing Museum to create a new museum and with SOS Villages to develop a new community center.

Ravenswood Senior Living Apartments (FKA The Winchester)

The development team plans to close and start construction in FY2018 on Ravenswood Senior Living Apartments at 4501 N. Winchester. This RAD project-based voucher subsidized development will create approximately 74 new CHA senior housing units. The first 15 units are projected for delivery in FY2018 with the remaining 59 units to be delivered in the following year. Of the 74 total CHA units, 4 will be fully accessible and 12 will be adaptable.

Washington Park 45<sup>th</sup> & Cottage Grove – Phase I (IL# to be assigned upon closing)

The development team plans to close and start construction in FY2018 on the first phase of Washington Park replacement housing at 45<sup>th</sup> & Cottage Grove. This development is expected to create approximately 84 new rental apartments for 21 public housing, 38 affordable and 25 market rate families. Of the 21 public housing units, 2 will be fully accessible and 4 will be adaptable.

Westhaven Phase IID Rental

CHA and its development partner are planning for the next Westhaven rental development to close and start construction in FY2018. This development plans to provide approximately 89 total new rental apartments including 35 for public housing residents in fulfillment of the Henry Horner HOPE VI CHA unit delivery requirements.

Funding for Redevelopment Activities

In response to Choice Neighborhoods or other Federal Notices of Funding Availability (NOFAs) released in FY2018, CHA may submit application(s) for grant funding for redevelopment and/or planning activities.

***General Description of Planned Capital Expenditures in FY2018***

General Description of Planned Capital Fund Expenditures During FY2018	
CHA's anticipates a total of \$336.5M in planned capital expenditures for FY2018.	
<ul style="list-style-type: none"> <li>• \$40.3M in planned construction activities, upgrades and repairs at CHA family buildings including Altgeld Gardens, Trumbull Park, Dearborn and Horner Homes, and elevator modernization.</li> <li>• \$5.7M in planned construction activities, upgrades and repairs at CHA senior buildings. This includes facade work at Albany Terrace Apartments and rehabilitation work at Congress Parkway.</li> <li>• \$5.0M in planned construction activities, upgrades and repairs at CHA scattered sites properties.</li> <li>• \$22.2M in architectural and engineering fees and other planned construction activities, upgrades and repairs at CHA community buildings.</li> <li>• \$164.6M in construction or planning/pre-development activities for mixed-income/mixed-finance properties, including Diversey Manor, Concord – 6418 N. Sheridan, Villages of Westhaven, Northtown-6800 N. Western, Harold Ickes- Phase 1A and Phase 1B, Ravenswood Senior Living-4501 N. Winchester, Independence-4022 N. Elston, Taylor Street Library and Apartments, Lathrop Homes Phase 1A and Phase 1B, 45th &amp; Cottage Grove, Logan Square, Parkside III Condo, Oakwood Shores IIB (TWO), John Pennycuff, Real Estate Acquisition Program and other master planning activities.</li> <li>• \$98.7M in planned construction activities, upgrades and repairs for senior buildings that will transition to the Rental Assistance Demonstration (RAD) program.</li> </ul>	

**Section II-B: Leasing Information*****Planned Number of MTW Households Served at the End of FY2018***

By the end of FY2018, CHA currently anticipates serving a total of 68,897 MTW households across HCV and public housing programs. MTW HCV households include 11,214 households in sites that will be converted to RAD by the end of FY2018.

**Planned Number of Households Served at the End of FY2018**

MTW Households to be Served Through:	Planned Number of Households to be Served*	
	Planned Number of Unit Months Occupied/Leased***	
Federal MTW Public Housing Units to be Leased	11,788	141,456

CHA Proposed Amended FY2018 MTW Annual Plan – Submitted to HUD on May 23, 2018

## Section II: General Housing Authority Information

Federal MTW Voucher (HCV) Units to be Utilized	57,109	685,308
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>68,897</b>	<b>826,764</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 FY2018***

By the end of FY2018, CHA anticipates serving a total of 2,515 households through non-MTW HCV programs, including Veterans Affairs Supportive Housing (VASH), Moderate Rehab and Mainstream 5-Year programs.

Non-MTW Households to be Served Through:	Planned Number of Households Served	Planned Number of Unit Months Occupied/ Leased
VASH	1,188	14,256
Mod Rehab	1,277	15,324
Mainstream 5-Year	50	600
<b>Total Non-MTW Households</b>	<b>2,515</b>	<b>30,180</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 FY2018***

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers or Local, Non-Traditional Units and Solutions in FY2018	
Housing Program	Description of Leasing Issues and Solutions
Federal MTW Public Housing Program	<p>CHA will continue to prioritize the issue of offline units in FY2018 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 FY2018, CHA will continue to increase housing opportunities to HCV participants by facilitating lease-up in mobility areas through increased use of its exception payment standard and newly implemented landlord incentive payments programs.

## **Section II-C: Wait List Information**

In FY2018, CHA will maintain the following major wait lists across public housing and Housing Choice Voucher programs.

***Public Housing Wait Lists******Family Housing (Site-Based) Wait List***

The Family Housing (Site-Based) Wait List contains adult applicants who are interested in units within CHA's city-wide traditional family portfolio and mixed-income housing properties. CHA will transition from a Community-Wide Wait List to Site-Based Wait Lists in FY2018. Site-Based Wait Lists will remain open.

***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 FY2018, Scattered Sites (Community Area) Wait Lists will remain open.

***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 FY2018, all Senior Site-Based Wait Lists will be open and accept applications.

***PBV (PRA) Wait List***

In FY2018, CHA will transition to site-based PRA wait lists which will allow applicants to select housing by specific property, supportive service need, and general location.

***HCV Wait List***

In FY2018, 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 for demonstration programs and special initiatives in FY2018.

***Wait List Projections for FY2018***

Wait List Information Projected for the Beginning of FY2018				
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 FY2018
Federal MTW Public Housing Units	Site-Based (Family Housing)*	30,635	Open	Yes
Federal MTW Public Housing Units	Program Specific (Scattered Site/Community Area)	7,878	Open	Yes
Federal MTW Public Housing Units	Site-Based (Senior)	13,532	Open	Yes
Federal MTW Project Based Voucher Program	Program Specific * (PRA Program)	14,877	Open	Yes
Federal MTW Housing Choice Voucher Program	Program Specific (Tenant-Based Vouchers Only)	42,000	Partially Open	No

\*CHA will transition the Community Based (Family Housing) and PRA Wait Lists to Site-Based Wait Lists in FY2018.



***Description of Partially Opened Wait Lists***

**HCV and PRA/PBV Wait Lists**

In FY2018, 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 (e.g. 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 FY2018***

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

In FY2018, 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 FY2018, CHA will transition to site-based PRA wait lists which will allow applicants to select housing by specific property, supportive service need, and general location. CHA also continues 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**

CHA will transition from a Community-Wide Wait List to Site-Based Wait Lists in FY2018.



# 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 FY2018.

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

- **Description and Impact:** Over the past few years, CHA has modified the Family Self-Sufficiency program. These include (from oldest to most recent):
  - In FY2014 a revision of the participation requirements included an opt-out of EID, the ability to terminate participants who were not engaged in the program, a 12-month employment requirement and annual requirement to participate in financial education and coaching.
  - In FY2017, CHA received authorization for an exemption from the requirement that Family Self Sufficiency (FSS) Program (FSS) enrollments must take place within 120 days of an annual or interim recertification of income process. 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 recertification.

The goal of these revisions was to remedy several issues, including existing disincentives to participation due to not earning escrow while enrolled in EID; underutilization of the program by participants who are not fully interested in engaging; and lack of financial self-sufficiency of current graduates. Further, the calculation and rules surrounding FSS are often confusing and difficult to explain to participants, resulting in some participants being unable to reconcile their goal attainment with an escrow payout. The overall goal is to maximize engagement in the FSS program and maximize the benefits of participation for those enrolled in the program.

In FY2018 CHA is proposing a modification to FSS escrow savings accrual from the traditional escrow calculation based on increased earnings to an incentive savings model in which participants accrue escrow by achieving specific milestones or activities associated with pay points. Traditionally in FSS, for participants whose rent increases are due to an increase in earned income, the approximate difference in dollar amount between the former total tenant payment (TTP) and the new TTP is placed into an interest bearing escrow account. Over the period in which the resident participates and successfully graduates from the FSS program, earned escrow is accumulated for the resident. The existing rules around escrow accumulation could be more directly in line with the goal of the program, which is to move forward on a journey to self-sufficiency. Motivated residents who were already employed, many limitedly, were not incentivized to enroll in the program. Others made great strides in the program and accomplished many of their goals but did not see escrow accumulation, often leaving them confused and discouraged.

The modified escrow calculation will achieve the following:

- Escrow payments will be more equitable; program completers will achieve a minimum level of savings, and in a similar range <sup>2</sup>;
- The pathway through the FSS program will be more clearly defined, and structured around steps/activities that support the goal of the program – moving families toward self-sufficiency; and
- The escrow component of the program will be more motivating and tangible to participants, staff, and other stakeholders.
- Reduction of administrative burden, costs and accounting activities associated with escrow management;

---

<sup>2</sup> In 2016, graduate payouts ranged between \$0 - \$34,000, averaging \$5,275.

The proposed Pay Point model would allow participants to earn escrow based on the attainment of various goals of the program: employment, education, financial stability, and homeownership or transition out of subsidized housing. As participants achieve their goals, a structured incentive payment would be placed into escrow. Participants will continue to meet the obligations/rules of the FSS program (e.g. no public assistance for 12 months prior to graduation, 12 months of employment, engagement with FSS Coordinator.) but their escrow would be linked to goal attainment. Examples of pay out points include:

- The completion of a GED, Associates, Bachelor's or Master's Degree
- Obtaining new employment
- Employment retention for 12-months
- Engagement in financial education and coaching
- Improving credit score
- Increasing personal savings
- Purchasing of a home through Choose to Own

Annually, CHA will publish the pay points and associated incentive credit amounts in the FSS Action Plan submission to HUD and make them available on CHA's website ([www.thecha.org](http://www.thecha.org)). CHA does not anticipate annual changes, but reserves the right to make revisions. Further, CHA does not anticipate a significant change in payouts to participants by switching to this model. Under the proposed model, a participant who is fully engaged in the program and graduates after 5-years would accrue between \$4,000 and \$15,000 in escrow savings, which is consistent with CHA's current average and median escrow accrual ranges. From 2015 - 2017, 212 FSS program graduates had escrow payouts ranging from \$0 - \$34,169 with an average of \$5,715 paid out. Fourteen participants earned \$0 in escrow savings while 11 participants earned over \$15,000. Based on goals achieved by past participants, CHA anticipates that most participants will achieve 5 – 8 pay points, and that escrow accrual for program graduates will range between \$4,000 - \$8,000.

CHA will develop a revised Contract of Participation that outlines the new escrow accrual process and program requirements. 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.

Upon approval, CHA will notify participants already in the program how this model will impact them. Participants graduating in 2018 will remain on the current FSS program model. All other participants who have accrued escrow through December 31, 2017, will have their escrow frozen and will transition to the new pay point model for the remainder of their Contract of Participation. Upon graduation, they will receive both their escrow and any pay point FSS model. All current participants effected by the change will be required to sign an addendum to their current Contract of Participation.

- Implementation Year: FY2014, FY2017 updates; FY2018 for this updated 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 has implemented the waiver of the 120-day certification requirement and has experienced a 66% increase in monthly enrollment compared to the previous year before implementation. We anticipate that this change to the new Pay Point model will continue to increase enrollment.
- Standard Metrics:

## Section III: Proposed MTW Activities

Standard Metric	Unit of Measurement	Baseline	FY2018 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 FY2018, 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 FY2018, 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 FY2018, 400 FSS participants will have income from wages.
		In FY2013, 46% of FSS participants had income from wages.	In FY2018, 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 FY2018, 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 FY2018, 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).	<u>Public Housing:</u> In FY2013, the average subsidy per public housing household was \$6,519 (based on 21,417 eligible units).	<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 FY2018.
		<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 FY2018.
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>Public Housing:</u> The total contribution of public housing FSS participants will remain stable at \$1,000,000 (230 households) in FY2018.
		<u>HCV:</u> In FY2013, HCV FSS participants contributed a total of \$1,831,476 (505 households).	<u>HCV:</u> The total contribution of HCV FSS participants will remain stable at \$1,800,000 (500 households in FY2018).

### Section III: Proposed MTW Activities

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 FY2018, 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.

#### *Increased Payment Standards at Interims (2018-01)*

- **Description:** CHA proposes to implement an activity that applies to CHA’s entire jurisdiction that would allow CHA to increase payment standards at Interims for elderly/disabled households and any household that receives a rent increase. Because elderly and disabled households are on a triennial reexamination schedule and other households are on a biennial reexamination schedule, the Fair Market Rent used to determine their subsidy amount is outdated and does not reflect the current costs of housing in Chicago. Because there is no affordability constraint to the amount an owner can charge after the initial lease term, when an owner requests a rent increase between scheduled reexaminations, the participant is forced to make a decision between increasing their monthly rent burden or incurring expensive moving costs. This activity will enable CHA to use the current payment standard in effect for a given unit at an interim examination, rather than the payment standard that was in effect at the time of the participant’s last regular examination. The goal of this activity is to decrease the financial burden on these households by allowing the CHA subsidy to keep pace with the market, which will decrease the number of voucher holders whose rent burden exceeds 30% of their adjusted monthly income.
- **Implementation Year:** FY2018
- **Impact Analysis:** Had this policy been in place in 2016, approximately 300 Interims would have resulted in a payment standard increase with a yearly increase in HAP of approximately \$230,000 in the aggregate. This is an estimate and is significantly impacted by unknown variables such as future Fair Market Rents (FMR) If FMR’s continue to increase (and based on current trends this seems likely) there is a high probability that this number will be higher in future years. Although, unable to quantify this number, this activity would also reduce the number of participants who move due to a significant increase in rent burden.
- **Hardship Policy:** N/A
- **Implementation Plan:** CHA plans on implementing this activity in 2018.
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Standard Metrics**

Standard Metric	Unit of Measurement	Baseline	FY2018 Benchmark
SS-2 Increase in Household Savings	Total number of participants who received an increase in payment standard at their Interim due to this activity	In FY2016, 0 participants received an increase in payment standard at their interim.	Once this policy is implemented in FY2018, CHA anticipates that 5,400 participants will receive an increase in their payment standard at their interim.

- **Data Collection:** CHA will collect data on an ongoing basis on the number of Interims done with an increase in payment standard.
- **Authorization:** Attachment C, Section D (2)(a) of CHA’s Amended and Restated MTW Agreement, which waives certain provisions of 24 C.F.R. 982.508.

***Income Calculation Hardship Exemption (2018-02)***

- **Description:** CHA proposes to implement a hardship exemption for working heads of households who are making required child support payments that hinder their ability to pay their monthly rent portion. Currently, these payments are not deducted from income calculations that determine the portion of rent paid by the participant, which can put participants at risk of falling behind on their rent and eventually being evicted. This activity allows working heads of household who request this hardship exemption to receive a 100% deduction of their total child support payments. Participants will be informed of this hardship exemption via language on the application completed at intake, and during reexaminations.
- **Impact Analysis:** Had this activity been in place in FY2016, those participants who had required child support payments would have been much more likely to make their rent payments on time and avoid eviction.
- **Implementation Year:** FY2018
- **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.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2018 Benchmark
HC-4: Displacement Prevention	Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	In FY2016, 3 participants would have met the criteria to receive this income deduction.	Once this policy is implemented in FY2018, CHA will track the number of participants who receive this income deduction.

- **Data Collection:** CHA will collect data on an ongoing basis on the number of participants who receive this income deduction.
- **Authorization:** For HCV, Attachment C, Section D (2)(a) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of 982.503 and 982.508.

***Modified Exception Payment Standards/Altering Mobility Area Map (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> CHA proposes increasing the current limit from 150% FMR to 250%, only in cases where it's needed as a Reasonable Accommodation for households who need specific accessibility amenities. Previously, we have requested waivers from HUD in these situations, however, this process is time consuming, burdensome for the family, and many times while approval is pending the unit is no longer available.

The Department of Housing Rights and Nondiscrimination reviews each reasonable accommodation request and ensures that a Knowledgeable Professional certifies that a nexus exists between their disability and specific features provided by that unit. Additionally, staff will determine if it is reasonable for the voucher holder to find a unit with the necessary amenities that doesn't exceed 250% of FMR (under the proposed increase) within the given timeframe, and without causing undue burden.

Research shows that units with accessibility features have significantly higher rents. Without this increase, households with accessibility needs are severely limited in their housing options. The median rent for accessible



units in Mobility Areas range from 192% of FMR (studios) to 295% (3 bedrooms). Moreover, the median minimum rents for accessible properties throughout the entire city of Chicago range from 178% to 240% of FY2017 FMR. Additionally, the current exception payment standard policy gives these households access to less than 20% of the accessible units in these areas.<sup>3</sup> This modification drastically expands the housing options for these families.

Exception payment standards are part of CHA's strategy to expand housing choices for HCV participants through access to Mobility Areas throughout Chicago. CHA proposes changing those eligible for EPS from Opportunity Areas to Mobility Areas that are based on Community Area as opposed to census tract, which significantly increases the number of areas a voucher holder can receive an EPS, and gives them access to neighborhoods previously unavailable. Mobility Areas will be defined as Community Areas with a poverty level at or below 20% and below median violent crime; or Community Areas with moderate poverty and crime plus other positive economic indicators. All HCV rents, including rents for which an Exception Payment Standard might apply, are subject to a review for rent reasonableness.

CHA will approve an exception payment standard only in the following cases:

1. CHA has approved a reasonable accommodation for the family due to accessibility needs, irrespective of the location of the unit (limit to 250% FMR)
2. CHA has approved any other type of reasonable accommodation for the family (limit to 150% FMR)
3. The family is residing in or moving into a CHA-designated Mobility Area.

The impact of this activity is an increase in housing opportunities for families that require accessible units and for families who would live to live in neighborhoods designated as Mobility Areas that typically may have higher rents than units not in Mobility Areas. Had this modification been in place in 2017 CHA would avoided requesting six waivers from HUD.

- **Implementation Year:** FY2010 modified in 2018
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Status Update:** In FY2018, CHA will continue 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 Mobility Areas. CHA will continue to evaluate the implementation of exception payment standards in the future.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2018 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 FY2018, 1,836 households will lease in Mobility Areas with exception payments standards including new and existing leases

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

<sup>3</sup> Charles Barlow, Research Director, Working Group on Housing Choice Vouchers, Chicago Area Fair Housing Alliance to Chicago Housing Authority. Review of Exception Payment Standards for Housing Choice Voucher Program Participants Requesting Reasonable Accommodation, 5/9/2017

- **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.

***PBV Contract Commitments with 21-30 Year Initial Terms (2011-05)***

- **Description and Impact:** To facilitate the expansion of affordable housing opportunities through the use of project-based vouchers, when originally proposed, this activity allowed CHA to enter into project-based voucher HAP contracts for an initial term between 16 and 30 years. In light of regulatory changes, CHA is now requesting MTW authority to enter into contracts that have an initial term of 21-30 years. CHA's relevant contracts will 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.
- **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 FY2018.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2018 Benchmark
CE-1: Agency Cost Savings	Total cost of task in dollars (decrease).	In FY2010, 0 PBV units were available with 21-30 year initial contracts.	242 PBV units will be made available with 21-30 year initial contracts ,
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	0 PBV units preserved with 21-30 year initial contracts.	242 PBV units made available with 21-30 year initial contracts .

- **Data Collection:** CHA will track the number of additional PBV units that are made available through executed HAP contracts with initial terms of 21 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.



# 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 FY2017.

### **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 FY2018, CHA plans to deliver an additional 808 public housing and project-based voucher units to achieve the 25,000 unit goal.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2018 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 units were delivered toward the 25,000 unit goal prior to FY2000.	CHA will deliver 808 new housing units in FY2018 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).	0 units were rehabilitated toward the 25,000 unit goal prior to FY2000.	CHA will preserve 560 PBV units, including 200 through Mod Rehab conversions, in FY2018 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.

#### Section IV: Approved MTW Activities

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 had determined it no longer needed separate alternative reasonable cost limitations for rehabilitation and redevelopment. CHA instead utilizes 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 FY2017, CHA plans to use the alternative cost formula to close and start construction on 1340 W. Taylor – Taylor Street Library and Apartments, which is planned to deliver a total of 37 public housing units in FY2018. In FY2018, CHA plans to utilize the alternative close formula at five sites, which plan to deliver a total of 148 public housing units in FY2019. In FY2018, CHA will not utilize the alternative cost formula for rehabilitation of any units.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2018 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.	14 additional public housing units will be 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).	0 housing preserved through use of the alternate TDC formula.	In FY2018, 0 housing will be preserved 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.	In FY2018, the average wait time for Public Housing Family Wait List applicants (36,014) will remain stable at approximately 39 months.
HC-4: Displacement Prevention	Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	0 households lost assistance or had to move prior to use of the alternate TDC formula.	0 households will lose assistance or have to move in FY2018 through use of the alternate TDC formula.
CE-1: Agency Cost Savings	Total cost of task (in dollars).	CHA spent 0 dollars through use of the alternate TDC formula prior to implementation.	In FY2018, CHA will use the MTW alternative TDC formula to deliver 14 additional public housing units at a cost of \$5,600,000 and place 19 additional public housing units under construction at a cost of \$6,312,155.  In FY2018, CHA estimates a cost of \$0 for rehabilitation projects using the alternate TDC formula.

## Section IV: Approved MTW Activities

Units Planned for FY2018 Delivery that will use MTW TDC	Public housing units without MTW TDC	Additional public housing units with MTW TDC	Total Public Housing Units
1340 W. Taylor – Taylor Street Library and Apartments	23	14	37
<b>Total Units</b>	<b>23</b>	<b>37</b>	<b>37</b>

Developments Planned to be Under Construction in FY2018 using MTW TDC	Public housing units without MTW TDC	Additional public housing units with MTW TDC	Total Public Housing Units
Oakwood Shores 2B (Two)	16	2	18
45 <sup>th</sup> and Cottage Grove	16	5	21
Parkside III Rental	54	0	54
Park Blvd. III Rental	25	6	31
4630 S. Ashland	18	6	24
<b>Total Units</b>	<b>129</b>	<b>19</b>	<b>148</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 (four or less 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. Further, CHA will not pay more for a property than its assessed value; if a property is purchased for more than the assessed value, CHA will make up the difference between the assessed value and purchase price with non-federal funds.

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.
- **Status Update:** CHA continues to look for opportunities to acquire units as they become available.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2018 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 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.	0 additional public housing units will be made available as a result of this activity in FY2018.
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.	In FY2018, the average wait time for Public Housing Family Wait List applicants (36,014) will remain stable at approximately 39 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.	0 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 2017, the minimum rent population (those paying \$75 per month) includes 8,298 HCV households. There are 444 additional HCV households (5%) in the hardship population, meaning they are paying less than \$75 per month.,
  - **Public Housing:** As of May 2017, the minimum rent population includes 1,916 Public Housing and 59 RAD households. 242 (12.3%) Public Housing households and 12 RAD households from the total minimum rent population, have a hardship and are paying less than \$75
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2018 Benchmark
CE-5: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<p><b>HCV:</b> In FY2008, 5,010 residents were expected to pay \$50 minimum rent for a total annual contribution of \$3,006,000.</p> <p><b>Public housing:</b> In FY2008, 1,524 residents were expected to pay \$50 minimum rent for a total annual contribution of \$914,400.</p>	<p><b>HCV:</b> In FY 2018, 7,900 residents will be paying \$75 minimum rent for a total annual contribution of \$7,110,000</p> <p><b>Public Housing and RAD PBV</b> In FY2018, 1,975 households were expected to pay \$75 minimum rent for a total annual contribution of \$1,777,500.</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 (CTO) Homeownership Program. Rather than the minimum income of \$14,500, the new eligibility requirement is 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 was approved by CHA's Board, and went into effect on January 1, 2015. This change does not apply to those who are elderly or disabled who enroll in the program.

In FY2011, CHA expanded the CTO Program beyond HCV participants to current CHA public housing residents. 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 remaining an eligible participant. The overall impact of the CTO 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:** In FY2017, CHA celebrated the 15-year anniversary of the CTO Program, and surpassed its 500<sup>th</sup> homeowner, with more than 118 families assuming their own mortgage
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2018 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 FY2018, 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 FY2018, 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 FY2018, 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 implemented 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)
- **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: As of June 2017, 3,887 households were placed on a triennial schedule, which will save the agency \$3,663,498 in FY2018.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline <sup>^</sup>	FY2018 Benchmark
CE-1: Agency Cost Savings	Total cost of task (in dollars).	<p><u>HCV:</u> 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><u>Public Housing:</u> In FY2013, CHA spent \$367,800 on annual re-exams for fixed- income elderly/disabled households (4,904 re-exams x \$75).</p>	<p><u>HCV:</u> In FY2018, based on the existing triennial schedule CHA will spend approximately \$594,500 on re-exams for fixed income/elderly disabled households (4,100 X \$145).</p> <p><u>Public Housing:</u> FY2018, CHA will spend approximately \$391,500 on annual re-exams for fixed income elderly/disabled households (2,700 re-exams x \$145).</p>
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	<p><u>HCV:</u> 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><u>Public Housing:</u> 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><u>HCV:</u> In FY2018, based on the existing triennial schedule, CHA will spend approximately 27,000 staff hours on triennial re-exams for HCV fixed income/elderly households. (4,100 X 6.5 hours).</p> <p><u>Public Housing:</u> In FY2018, CHA will spend approximately 17,550 staff hours on annual re-exams for public housing fixed-income (2,700 re-exams x 6.5 hours).</p>
CE-5: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<p><u>HCV:</u> In FY2013, based on the existing biennial schedule, eligible fixed-income elderly/disabled households contributed a total of \$11,398,176 (3,591 households).</p> <p><u>Public Housing:</u> In FY2013, public housing fixed-income elderly/disabled households contributed a total of \$15,526,368 (4,904 households).</p>	<p><u>HCV:</u> In FY2018, based on the existing biennial schedule, eligible fixed-income elderly/ disabled households will contribute a total of approximately \$13,100,000 (4,100 households).</p> <p><u>Public Housing:</u> In FY2018, public housing fixed-income elderly/ disabled households will contribute a total of approximately \$8,700,000 (2,700 households).</p>
<sup>^</sup> 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 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.

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 receives applications monthly and an internal committee discusses each candidacy. As of May 2017, 14 individuals were housed through the program. All of the applications are from individuals already on CHA's wait list. CHA has not received any applications requesting to join an existing household; therefore, metrics that focus on this group will remain at zero.
- Standard Metrics:

## Section IV: Approved MTW Activities

Standard Metric	Unit of Measurement	Baseline	2018 Benchmark
CE-4: Increase in Resources Leveraged	Amount of funds leveraged in dollars (increase).	0 funds were leveraged through the re-entry pilot program prior to implementation.	\$84,000 in funds leveraged through the re-entry pilot program for services for 24 participants in FY2018
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 FY2018.
SS-3: Increase in Positive Outcomes in Employment Status*	Other category defined as:	In FY2013, 11,104 of 24,139 "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 FY2018.
	Having earned income.	In FY2013, 46% of "work-able" PH and HCV heads of household had income from wages.	
SS-5: Households Assisted by Services that Increase Self-Sufficiency	Number of households receiving services aimed to increase self-sufficiency (increase).	0 program participants received services through the re-entry pilot program prior to implementation.	24 program participants will receive services through the re-entry pilot program in FY2018.
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).	<u>Public Housing:</u> In FY2013, the average subsidy per public housing household was \$6,519 (based on 21,417 eligible units).	<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 FY2018.
		<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 \$9,756 (based on 45,977 HAP vouchers) in FY2018.
SS-7: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<u>Public Housing:</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.	<u>Public Housing:</u> The total contribution of public housing families with program participants will be consistent with CHA's average in FY2018.
		<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.	<u>HCV:</u> The total contribution of HCV families with program participants will be consistent with CHA's average in FY2018.
SS-8: Households Transitioned to Self-Sufficiency**	Number of households transitioned to self-sufficiency (increase).	0 program participants transitioned from a conditional lease to join the household after 4 years prior to implementation.	0 program participants will transition from a conditional lease to join the household in FY2018
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).	0 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 FY2018.

- 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 wait list 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 wait list 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 wait list. 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 wait list. If at any time during the outreach, eligibility and selection process a candidate is deemed ineligible, the household maintains their position on the wait list. All Housing Choice Voucher program rules apply. However, since the Mobility Counseling Demonstration Program targets CHA Mobility 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 wait list.

Since the target population for the Mobility Counseling Demonstration Program comes from the public housing wait list, where applicants assume that they will participate in CHA's work requirement activity, CHA has carried the work requirement over to this population in order to test how a work requirement might work in the HCV program. CHA utilizes 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 implemented the Mobility Counseling Demonstration Program in FY2015, prior to HUD approval of the work requirement component. Upon HUD approval, all new participants who consented to the program were 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 60 under this activity.

- **Implementation Year:** FY2016
- **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:** As of June 2017, 73 participants were housed through the demonstration program. Further, of the 62 participants who were housed prior to the work requirement implementation date, 39 were meeting that requirement as of 12/31/2016.
- **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	FY2018 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 FY2018, 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 of 4,154 "work-able" public housing heads of household subject to the work requirement had income from wages. In FY2014, 59% of "work-able" public housing heads of household subject to the work requirement had income from wages.	In FY2018, 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
SS-4: Households Removed from TANF	Number of households receiving TANF assistance (decrease).	0 program participants were removed from TANF prior to implementation of the demonstration program	In FY2018, 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).	0 program participants received services prior to implementation of the demonstration program.	In FY2018, 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 FY2018, 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).	0 dollar increase in agency rental revenue prior to implementation of the demonstration program.	In FY2018, the total contribution of participating 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 5,051) had all adults in compliance.	In FY2018 the number of program participant households subject to the work requirement with all 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).	0 program participants received services prior to implementation of the demonstration program.	In FY2018, 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, and engagement in services.
- **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:** In FY2016, CHA implemented 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>4</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>5</sup>
- **Implementation Year:** FY2016 for Public Housing, FY2006 for HCV
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:** Biennial reexaminations for public housing residents began in August 2016. All eligible households will be on a biennial re-examination schedule by the end of August 2017. HCV residents are currently on biennial re-examination schedules.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline <sup>^</sup>	FY2018 Benchmark
CE-1: Agency Cost Savings	Total cost of task (in dollars).	HCV: In FY2013, HCV households who had re-exams, based on a biennial	HCV: In FY2018 re-exams for applicable HCV participants will cost

<sup>4</sup> CHA conducts annual re-examinations for public housing and HCV households participating in the Choose to Own program 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>5</sup> CHA conducts annual re-examinations for public housing and HCV households participating in the Choose to Own program 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.

## Section IV: Approved MTW Activities

		<p>schedule, (14,105 households, or half of the total 28,209 biennial-eligible households) cost approximately \$1,057,875. (14,105re-exams x \$75).</p> <p><u>Public Housing:</u> In FY2013, annual re-exams for PH households eligible for biennial re-exams cost \$960,075 (12,801 re-exams x \$75).</p>	<p>approximately \$2,320,500 (16,000 re-exams X \$145)</p> <p><u>Public Housing:</u> In FY2018 biennial re-exams for PH households will cost \$132,820 (916 re-exams x \$145).</p>
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	<p><u>HCV:</u> 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 (14,105re-exams x 3.5 hours)</p> <p><u>Public Housing:</u> 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><u>HCV:</u> In FY2018 CHA will spend \$104,000 on re-exams for applicable HCV participants. (16,000 re-examines X 6.5)</p> <p><u>Public Housing:</u> In FY2018, CHA will spend 5,954 staff hours on biennial re-exams for PH households. (916 re-exams x 6.5 hours)</p>
CE-5: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<p><u>HCV:</u> 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 total 28,209 biennial-eligible households).</p> <p><u>Public Housing:</u> In FY2013, public housing households eligible for biennial re-exams contributed a total of \$49,185,852 (12,801 households).</p>	<p><u>HCV:</u> In FY2018, HCV households who are due for re-exams, based on a biennial schedule, will contribute a total of \$62,745,000 (16,000 households).</p> <p><u>Public Housing</u> In FY2018, public housing households on a biennial schedule will contribute aa approximate total of \$3,971,685 (916 households).</p>
SS-1: Increase in Household Income	Average earned income of households affected by this policy in dollars (increase).	<p><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.</p> <p><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).</p>	<p><u>HCV:</u> In FY2018, the average income from wages for 16,000 HCV households who had biennial re-exams is expected to be \$7,000.</p> <p><u>Public Housing:</u> In FY2018, the average income from wages for public housing households on a biennial schedule will be \$14,453 (916 households).</p>
SS-3: Increase in Positive Outcomes in Employment Status**	Other category: Having earned income.	<p><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).</p>	<p><u>HCV:</u> In FY2018, 6,000 “workable” HCV heads of household are expected to have income from wages.</p>



## Section IV: Approved MTW Activities

		<p>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).</p> <p><u>Public Housing:</u> In FY2013, 2,976 “work-able” public housing heads of household eligible for biennial re-exams had income from wages.</p> <p>In FY2013, 59% of “work-able” public housing heads of household eligible for biennial re-exams had income from wages.</p>	<p>In FY2018, 56% of “workable” HCV heads of household eligible for biennial re-exams are expected to have income from wages.</p> <p><u>Public Housing:</u> In FY2018, 3,200 “workable” public housing heads of household eligible for biennial re-exams are expected to have income from wages</p> <p>In FY2018, 56% of “workable” public housing heads of household eligible for biennial re-exams are expected to have income from wages.</p>
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 FY2018, the number of HCV households eligible for biennial re-exams who receive TANF will remain stable at 1,000</p> <p><u>Public Housing:</u> In FY2018, the number of public housing households eligible for biennial re-exams who receive TANF will decrease to 3,000.</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 FY2018, 1,200 HCV households (of 16,000 who will have biennial re-exams) will move up at least one AMI category.</p> <p><u>Public Housing:</u> In FY2018, 1,000 Public Housing households (out of 8,000) 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.            *This number (15,994) will only count households who had biennial re-exams in FY2016 who are still participants in the HCV program as of 12/31/16, therefore it will not match the total number of households who had biennial re-exams in FY 2016, which will also include households who had biennial re-exams in FY2016 but as of 12/31/16 are no longer receiving HCV assistance.            **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 “workable” 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>6</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 180 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 is implementing the following updates to the public housing work requirement.

- CHA updated 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 increased the time for each Safe Harbor period from 90 days to 180 days. CHA determined that 90 days was an insufficient amount of time for residents to establish an action plan to meet the requirement,

<sup>6</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).

#### Section IV: Approved MTW Activities

which has often resulted in multiple Safe Harbor requests. Increasing the time period to 180 days enables residents to work with a service provider to create and implement an action and engagement plan.

- CHA requested 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 are provided by CHA's FamilyWorks program. This requirement ensures that FamilyWorks service providers intervene in a timely manner to assist residents and provide them with the necessary support to become compliant with the work requirement. CHA implemented the following procedures to enforce this requirement:
  - The resident and service provider 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 (FY2017 changes)
- 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 the changes in late FY2017.
- Standard Metrics:

Standard Metric	Unit of Measurement	Baseline	FY2018 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 FY2018, the average income from wages for households with a "work-able" adult subject to the work requirement will remain stable at \$12,000 (6,000 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.  52.7% of work-able public housing heads of household subject to the work requirement had income from wages in 2008.	In FY2018, "workable" heads of household subject to the work requirement with income from wages will remain stable at 3,200.  In FY2018, "workable" heads of 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 FY2018, "workable" households with a "work-able" adult subject to the work requirement receiving TANF will decrease to 2,000.
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 FY2018, the number of public housing households with a "work-able" adult subject to the work requirement engaged with service providers through FamilyWorks will remain stable at 4,300.

#### Section IV: Approved MTW Activities

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).	In FY2018, the average subsidy per public housing household will be \$8,993.40 (based on 17,853 eligible units).
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 FY2018, the total contribution of households with a “work-able” adult subject to the work requirement will remain stable at \$26,000,000 (6,000 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.	In FY2018, the percent and number of households subject to the work requirement that will have all adults in compliance will remain stable at 45% (3,500 households).
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.	In FY2018, the average wait time for Public Housing Family Wait List applicants (36,014) will remain stable at approximately 39 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	FY2018 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 FY2018, the percentages of residents in each work requirement compliance status will increase by 1 % to 3,077; those in Safe Harbor will decrease by 1% to 1,317 (pending HUD approval of changes to this activity).

**Compliant:** 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.

**Exempt:** Residents age 55 or older or those who meet disability/caretaker or other requirements for an exemption.

**Safe Harbor:** 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.

**Non-Compliant:** Non-exempt residents who are not meeting the requirement and are not approved for Safe Harbor.

**Under Legal:** Non-exempt residents who are undergoing eviction proceedings, whether for non-compliance with the work requirement or for any other reason.

\* See Chapter 8 of CHA’s *Admissions and Continued Occupancy Policy* (ACOP) for more detail.

- **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. In FY2017, CHA rolled out support for community activities that benefited all residents living in a mixed income property by recognizing community groups who requested assistance. We anticipate this program to further promote community activities.
- Standard Metrics:

Standard Metric	Unit of Measurement	Baseline	FY2018 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 will be engaged through the Office of the Ombudsman in FY2018.

- Additional Metrics:

Additional Metric	Unit of Measurement	Baseline	FY2018 Benchmark
Regional meetings to engage residents	Number of meetings held	0 meetings held before the creation of the Office of the Ombudsman.	Minimum of 4 meetings for mixed-income residents in FY2018.

- 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***

##### ***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 Inspection Excellence Program (formerly the Owner Excellence Program), and for units with an IEP (formerly UEP) 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 and achieve cost and time savings.

- **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 Inspection 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 biennial 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. As of June 2017, approximately 6,100 units have qualified for benefits and, because of this, CHA reinstated this activity in 2017 because we believe that more units would qualify and a greater number of landlords would be able to benefit from this activity. However, as of June 2017, CHA has yet to implement this change.
- **Standard Metric:**

Standard Metric	Unit of Measurement	Baseline	2018 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 FY2018, 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 FY2018, CHA anticipates cost savings of \$1,440 (15 IEP inspections x \$96 per inspection) 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 for IEP units (933 IEP inspections x .92 hours per inspection).	In FY2018, CHA anticipates time savings of 13.8 staff hours (15 IEP inspections x .92 hours per inspection) from passed annual or initial inspections.

- **Data Collection:** CHA tracks the number of units where a passed annual or initial inspection result has been transferred from one voucher holder to another. CHA estimates the cost of an initial/annual inspection is \$96 and takes .92 staff hours (55 minutes).
- **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: In FY2016, CHA altered the IEP program and expanded the number of units eligible for this payment to approximately 6,000. As of June 2017, based on historical average, CHA estimates the approval of 63 vacancy payments in FY2017 for a total cost of \$65,000. The evaluation of this change is ongoing and 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	FY2018 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.	50 units will be preserved through a vacancy payment in 2018.

- 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.

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

- Description and Impact: CHA proposed 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: FY2017
- Statutory Objective: MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures
- Status Update: CHA implemented this activity in February 2017 and will continue to monitor its impact of program efficiency.
- 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	FY2018 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)	In FY2018, CHA will spend \$200,000 (\$15 X13,350) on calculating assets.
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)	In FY2018, CHA will spend 4,600 (.34 X 13,350 staff hours on calculating assets.

- **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 Mobility 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 a Mobility Area. The tight rental market in Chicago, especially in Mobility Areas, coupled with the additional processing time to lease-up an HCV tenant compared to a market rate tenant, may provide a disincentive for Mobility Area landlords to participate in the HCV program. CHA believes this payment could incentivize more landlords in CHA Mobility 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 Mobility 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 Mobility Areas is approximately \$1,300 per month. If the activity had been implemented during FY2015, it would have cost the CHA roughly \$760,000. If this incentive is successful, the associated costs would increase. However, CHA has proposed 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 proposed that these incentive payments are funded using HCV HAP funds, rather than HCV administrative funds.

- **Implementation Year:** FY2017
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Status Update:** CHA implemented this activity in June 2017; CHA currently does not have any data to report, but will monitor its impact on the HCV program.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2018 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 Mobility Areas.	In FY2018, CHA anticipates that in 680 households will move into Mobility Areas and whose landlords will receive an incentive payment.



- Data Collection: CHA will track number of participants who move into a Mobility 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.

#### 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 2018.
- Standard Metrics:

Standard Metric	Unit of Measurement	Baseline	FY2018 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 will be 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.

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

- Description and Impact: For the Property Rental Assistance (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 FY2018, 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 <sup>^</sup>	FY2018 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 FY2018, CHA will spend \$8,633 on initial PRA inspections. (262 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 FY2018, 241 hours of staff time will be dedicated to initial PRA inspections for new construction and substantial rehab units. (147 units x .92 hours)
<sup>^</sup> 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 FY2018, 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 contract.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2018 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 FY2018, 262 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. As part of the RAD program, regulations state that the Earned Income Disregard (EID) policy is only available to residents with disabilities, in accordance with regulations for the Housing Choice Voucher (HCV) Program. For public housing sites transitioning to RAD, CHA will 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 had an EID exclusion. CHA requested this authorization to prevent undue hardship on current and future working heads of household and families in sites that transition to RAD.

- **Implementation Year:** 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 implemented this activity in FY2017. CHA converted mostly senior buildings to RAD in 2017 so EID did not apply to most of the residents in RAD PBV buildings.

- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2018 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 FY2018, the number of and average income from wages for households in RAD PBV sites is expected to remain stable at approximately \$14,500.**
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 FY2018, the number of "work-able" heads of households in RAD PBV sites with income from wages will decrease to 50.**  60% of "work-able" heads of household in RAD PBV sites will have income from wages in FY2018. **

\*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.

\*\*RAD conversions are currently take place at primarily senior properties.

- **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 requested 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 proposed 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:** FY2017
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:** CHA implemented this activity in FY2017.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2018 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 FY2018, 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 requested 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 38 senior properties analyzed, all 38 were negatively impacted by the 110% of FMR cap imposed by current PBV rules. Further, nine are also negatively impacted by a 120% of FMR cap. .

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 150% of FMR better safeguards 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 current standards for operating RAD PBV sites. Further, the requested increase to up to 150% of FMR is consistent with the exception payment standard for the Housing Choice Voucher Program.

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

#### Section IV: Approved MTW Activities

- **Status Update:** CHA has prepared an updated initial contract rent analysis for FY2018. Thirty-eight senior properties would be negatively impacted by a RAD Conversion subject to the Fair Market Rent (FMR) cap of 110% for RAD PBV properties, and thus unable to retain current subsidy levels. The changes in the benchmark reflects the combination of annual contract rent increase associated with the Operative Cost Adjustment Factor (OCAF) and anticipated changes to the unit count and contract rent at Covered Projects that would retain the Per-Unit Monthly (PUM) funding associated with non-dwelling/special purpose units. Because many of the changes have yet to be implemented with CHAPs for RAD properties, CHA will continue to implement this activity in FY2018.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2018 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 FY2018, all 8,642 dwelling units in the 38 senior properties within the RAD portfolio will have contract rent sufficient to maintain current standards for property operations.

- **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.

#### 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 be coordinated with the City of Chicago where CHA would contribute a specified amount of money to be pooled with other sources (e.g. hospitals, ESG, etc) to create a collective solution to housing persons experiencing homelessness. 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 subsidized housing. CHA anticipates allocating approximately \$800,000 towards this program.

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:** FY2018

CHA Proposed Amended FY2018 MTW Annual Plan – Submitted to HUD on May 23, 2018

- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families using Single Fund Budget with Full Flexibility.
- **Status Update:** Since proposing this activity, CHA has been in conversations with various entities, including the City of Chicago to discuss coordinated access and collective impact. CHA will implement this activity in 2018; however, CHA will propose a slight variation as to how the funding is utilized. Rather than creating additional units independently, CHA proposes to provide funding to a third-party entity chosen by the City of Chicago or through Chicago's Continuum of Care to serve as the administrator of funds to be leveraged with private and other public funds.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2018 Benchmark
CE-4: Increase in Resources Leveraged	Amount of funds leveraged in dollars (increase)	Funds leveraged as part of City's homelessness plan equals \$0.	CHA will add an additional \$800,000 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).	0 program participants received services prior to implementation of the program.	50 participants will receive services through CHA funding assistance for city programs in FY2018.
SS-8: Households Transitioned to Self Sufficiency	Number of households transitioned to self-sufficiency (Increase)	0 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).	0 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 FY2018.
HC-7: Households Assisted by Services that Increase Housing Choice	Number of households receiving services aimed to increase housing choice (increase)	0 households assisted in the Program Based Assistance program.	60 participants will receive social services that increased housing choice.

- **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.

### Summary of Implemented MTW Activities

FY2018 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 utilizes the reasonable cost formula for both redevelopment and rehabilitation projects.	Increase Housing Options	Attachment C, Section C(16)

Section IV: Approved MTW Activities

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)
2014-01	Modified Family Self-Sufficiency Program for HCV and Public Housing Participants	The modified program encourages participants to remain engaged, obtain escrow, and achieve consistent employment so they are better prepared for economic self-sufficiency upon graduation	Self Sufficiency	Attachment C, Section E
2014-02	Triennial Re-examinations for Households with only Elderly/Disabled Participants and Fixed Income for HCV and Public Housing	CHA implemented 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)
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)
2016-02	Mobility Counseling Demonstration Program Work Requirement	CHA has implemented 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)
<b>Public Housing</b>				
MTW Activity Number	Ongoing MTW Activity	Description	Statutory Objective	Authorization

Section IV: Approved MTW Activities

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

HCV

MTW Activity Number	Ongoing MTW Activity	Description	Statutory Objective	Authorization
2010-02	Exception Payment Standards	CHA is authorized to apply exception payment standards that may be up to 150% of HUD's published Fair Market Rents (FMRs) for the City of Chicago in order to increase housing options in mobility 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)
2017-01	Elimination of Assets in Income Calculation after Initial Eligibility for HCV Program	The calculation of assets will only be done at intake and is no longer necessary at re-examination.	Reduce Costs and Cost Effectiveness	Attachment C, Section D(1)(c) and Attachment C, Section D (3)(b)
2017-02	Incentive Payments for Landlords	CHA will 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 a mobility area.	Increase Housing Options	Amendment 6

PRA

MTW Activity Number	Ongoing MTW Activity	Description	Statutory Objective	Authorization
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



## Section IV: Approved MTW Activities

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)
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)
<b>Local Programs</b>				
2017-04	Funding for City of Chicago Housing Assistance Programs	CHA will implement program-based assistance using its single fund flexibility to help families access and remain stably housed.	Increase Housing Options	Amendment 6

### Activities on Hold

The following activity is on hold for FY2018.

#### *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 wait list 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 CHA Proposed Amended FY2018 MTW Annual Plan – Submitted to HUD on May 23, 2018

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 wait list, 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 wait list, 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 a Mobility 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: approved in FY2017
- 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.

- Status Update: CHA has decided to place this activity on hold in FY2018 until details as to how the activity will be implemented are determined.
- Authorization: Attachment C, Section D(1)(b), Section D(2)(a) and (d).

### **Closed Out Activities**

No MTW activities will be closed out in FY2018.



# Section Five

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



**CHA**

CHICAGO HOUSING  
AUTHORITY™

**Section V: MTW Sources and Uses of Funds**

This section contains information on CHA's anticipated sources and uses of funding in FY2018.

**Section V-A: Sources and Uses of MTW Funds*****Estimated Sources of MTW Funding for FY2018***

The following table shows projected sources of MTW funding in FY2018.

Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$58,141,152
70600	HUD PHA Operating Grants	\$750,185,058
70610	Capital Grants	\$112,709,245
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$3,126,986
71100+72000	Interest Income	\$1,272,000
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$6,645,312
70000	Total Revenue	\$932,079,753

***Explanations of CHA FY2018 MTW Sources:***

- FY2018 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 FY2018 voucher counts. CHA continues to finalize MTW HCV leasing projections for FY2018.

***Estimated Uses of MTW Funding for FY2018***

The following table shows projected uses of MTW funding in FY2018.

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$78,320,570
91300+91310+92000	Management Fee Expense	\$0
91810	Allocated Overhead	\$52,482,304
92500 (92100+92200+92300+92400)	Total Tenant Services	\$45,081,043
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$27,239,255
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$101,188,087
95000 (95100+95200+95300+95500)	Total Protective Services	\$28,074,285
96100 (96110+96120+96130+96140)	Total insurance Premiums	\$5,360,000

## Section V: MTW Sources and Uses of Funds

96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$16,352,132
96700 (96710+96720+96730)*	Total Interest Expense and Amortization Cost	\$27,459,183
97100+97200	Total Extraordinary Maintenance	\$10,000,000
97300+97350	Housing Assistance Payments + HAP Portability-In	\$473,749,504
97400	Depreciation Expense	\$117,254,033
97500+97600+97700+97800	All Other Expenses	\$1,113,000
90000	Total Expenses	\$983,673,396

\*CHA has issued general obligation bonds in the amount of \$325 million. Estimated interest expense on those bonds is included in this amount. This financing transaction will comply with all applicable HUD regulations.

## Reconciliation to CHA's 2017 Preliminary Budget

Total Expenses	\$983,673,396
Add back: Depreciation	(\$117,254,033)
Deduct: Capital Expenditures	\$336,487,197
Principal	\$1,325,000
Total Expenses	<u>\$1,204,231,560</u>
Use of Third-Party Financing	<u>\$250,000,000</u>

Explanations of CHA FY2018 MTW Uses

The estimated Housing Assistance Payments expense is based on 90% voucher utilization in FY2018. CHA continues to finalize MTW HCV leasing projections for FY2018.

- 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.
- CHA has issued general obligation bonds in the amount of \$325 million, \$250 million of which is budgeted to fund capital projects in FY2018. This financing transaction complied with all applicable HUD regulations.
  - Bond proceeds will be used to pay for the costs of projects that are subject to the Authority's MTW Agreement, so long as the use is included in an approved Annual MTW Plan.
  - Anticipated uses include public housing modernization, public housing construction and project-based voucher development.
  - A portion of the bond proceeds has been escrowed to make initial debt service payments.
  - CHA will repay the bonds using HCV administrative fees based on a 20-year amortization schedule.
  - CHA will provide HUD with information regarding bond uses and repayment in MTW Annual Reports and Plans beginning in FY2019.

***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
<p>The table below outlines CHA's use of the MTW single fund for FY2018, with projected expenditures by category based on CHA's FY2018 budget.</p> <p>CHA continues to use single fund flexibility by designing and/or continuing to implement local activities, including new initiatives described in Section I.</p> <p>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 FY2018.</p> <p>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.)</p>

**THE CHICAGO HOUSING AUTHORITY  
USE of MTW SINGLE FUND  
FY2018 ANNUAL PLAN**

	<u>FY2018 Single Fund</u>
<b>CENTRAL OFFICE</b>	<b>\$ 58,446,792</b>
 <u><b>HOUSING</b></u>	
Housing Choice Voucher	493,971,438
Property Office	181,658,453
Resident Services	<u>44,919,145</u>
<b>TOTAL HOUSING</b>	<b>720,549,036</b>
 <u><b>CAPITAL</b></u>	
Capital Repairs and Improvements	108,372,217
Capital Development	3,722,304
Capital Administration	<u>7,171,399</u>
<b>TOTAL CAPITAL</b>	<b>119,265,920</b>
 <b>DEBT SERVICE</b>	<b>28,784,183</b>
 <b>TOTAL USES</b>	 <b><u>\$ 927,045,931</u></b>

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. 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.

*Projected FY2018 Outcomes:* CHA will continue to provide relocation assistance to all residents requesting it under the Relocation Rights Contract.

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 2018 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 a Mobility 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 FY2018 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.

*Projected FY2018 Outcomes:*

- 1,500 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 FY2018 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 FY2018 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 3.0%.
- Regional senior music fests and the Senior Holiday Luncheon will engage more than 2,000 seniors.

**CHA Reserves**

The CHA has \$132M in operating reserves as recommended by HUD (4 months of operating expenses + 6% of vouchers). CHA does not have any additional reserves above this amount and no reserve fund usage is budgeted for 2018."

**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
<p>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.</p>	
Has the PHA provided a LAMP in the appendix?	Yes
<p>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:</p> <ul style="list-style-type: none"> <li>The CHA property portfolio continues to be managed by professional private management companies with performance metrics and standards identified in their contracts;</li> <li>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;</li> <li>Detailed accounting activities and financial analysis efforts are performed monthly to ensure that property expenditures are within budget guidelines and appropriately reported.</li> </ul> <p>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.</p> <p>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</p>	

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 19, 2017

**Item No. 1**

**Proposed FY2018 MTW Annual Plan**

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 FY2018 Moving to Work (MTW) Annual Plan and authorize CHA to submit the FY2018 MTW Annual Plan 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**

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 – August 31, 2017. CHA held three public comment hearings during the public comment period: August 8<sup>th</sup>, August 10<sup>th</sup> and August 17<sup>th</sup>. Announcements for the public comment process appeared on CHA's website and in the Chicago Defender on August 2<sup>nd</sup> and 9<sup>th</sup>; Chicago Sun Times on August 1st-4th and 7th; and Hoy Newspapers on August 4<sup>th</sup> and 11<sup>th</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 FY2018 MTW Annual Plan. Prior to finalizing the proposed FY2018 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:

Jennifer Hoyle, Director  
Strategic Management and Partnerships

**RESOLUTION NO. 2017-CHA-87**

**WHEREAS,** The Board of Commissioners has reviewed the Board Letter dated September 19, 2017 requesting approval of the Proposed FY2018 MTW Annual Plan and authorization to submit the Proposed FY2018 MTW Annual Plan to HUD attached hereto;

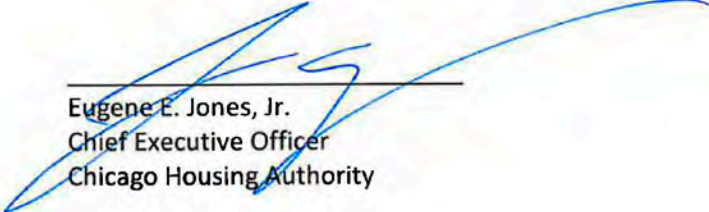
**THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE CHICAGO HOUSING AUTHORITY:**

**THAT,** The Board of Commissioners hereby approves the Proposed FY2018 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 FY2018 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 FY2018 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





**May 15, 2018**

**Item No. 1**

**Proposed FY2018 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 FY2018 Moving to Work (MTW) Annual Plan Amendment and authorize CHA to submit the FY2018 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 FY2018 MTW Annual Plan that includes one property demolition; thirteen property dispositions; and an update to the MTW sources and uses section.

A 30-day public comment period was conducted from April 6th – May 7th, 2018. CHA held two public comment hearings during the 30-day public comment period, on April 17th and April 20th. Announcements for the public comment process appeared on CHA's website and in the Chicago Defender on April 11<sup>th</sup> and 18<sup>th</sup>; Chicago Sun Times on April 6<sup>th</sup>, 9<sup>th</sup>, 10<sup>th</sup>, 11<sup>th</sup> and 12<sup>th</sup>; and Hoy newspapers on April 6<sup>th</sup> and 13<sup>th</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 public could submit comments orally and in writing regarding the proposed FY2018 MTW Annual Plan Amendment. Prior to finalizing the proposed FY2018 MTW Annual Plan Amendment, CHA considered 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:

A handwritten signature in black ink, appearing to read "Jennifer Hoyle", is written over a horizontal line.

Jennifer Hoyle

Director, Strategic Management and Partnerships



**RESOLUTION NO. 2018-CHA-28**

**WHEREAS,** The Board of Commissioners has reviewed the Board Letter dated May 15, 2018 requesting approval of the Proposed FY2018 MTW Annual Plan Amendment and authorization to submit the Proposed FY2018 MTW Annual Plan Amendment attached hereto;

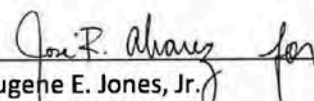
**THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE CHICAGO HOUSING AUTHORITY:**

**THAT,** The Board of Commissioners hereby approves the Proposed FY2018 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 FY2018 MTW Annual Plan Amendment supersedes all conflicting language found in prior CHA MTW Annual Plans;

**THAT,** The Board of Commissioners grants authorization to submit the Proposed FY2018 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 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	
Certifications of Compliance	
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:</b> <b>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>FY2018</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.

CHICAGO HOUSING AUTHORITY  
PHA Name

1L 002  
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)

JOHN T. HOOKER  
Name of Authorized Official

CHAIRMAN OF THE BOARD  
Title

John T. Hooker  
Signature

9/22/17  
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 FY2018 MTW Annual Plan for CHA Board approval, a 30-day public comment period was conducted from August 1 through August 31, 2017. CHA held three public hearings during the comment period: (1) on August 8<sup>th</sup> at the Charles Hayes Family Investment Center, 4859 S. Wabash; on August 10<sup>th</sup> at Ella Flagg Apartments, 4645 N. Sheridan; and (3) on August 17<sup>th</sup> at Patrick Sullivan Apartments, 1633 W. Madison. A total of 24 people participated in these hearings. The following table includes public comments and CHA responses.

<b>Proposed FY2018MTW Annual Plan</b> <b>Public Comment Period: August 1 - 31, 2017</b> <b>Public Comment Hearings: Aug 8, 6:00p FIC; Aug 10, 1:00 Elias Flagg; Aug 17, 1:00 Patrick Sullivan</b>			
<b>Comment #</b>	<b>Individual/ Organization</b>	<b>Comment</b>	<b>CHA Response</b>
1	Tymikee Brown, t-brown25@neiu.edu	<p>As a participant of the housing program, I have not been happy with the process of receiving and getting appointments to relocate. In addition, after talking with other residents from other locations they too thought the process of relocating has been difficult and help the process run smoothly not inconvenient for participants and property owners, here is what I found that needs to change with CHA:</p> <p>First, you have to apply at office for an appointment. Then you do not know how long it will take to receive an appointment that is when you apply for moving papers. However, you do not get a time of how long it will take to receive a letter or appointment to pick up moving documents and to move out of former unit while new property owner is holding the new unit for you. In addition, you will have to get new unit inspected before the approval of moving in. In addition, most property owners feel that they are missing income when holding a unit for a CHA participant. Therefore, there need to be some kind of incentive to keep them interested in new tenants that is waiting for approval, that the date is not determine but a waiting period.</p> <p>Second, I cannot compete for units in nicer areas because of the process. I strongly suggest you...</p> <ol style="list-style-type: none"> <li>1) Make the moving process faster and easier.</li> <li>2) Enforce the source of income protection laws.</li> <li>3) Give property owners in nicer areas an incentive to take vouchers.</li> <li>4) End the corruption in the inspection process make it transparent. Investigate prosecute Inspectors being paid off</li> </ol>	<p>Thank you for your comments. CHA is always exploring ways it can streamline its HCV processes. While CHA does not directly enforce source of income protection laws for the City of Chicago, CHA does work closely with the Chicago Commission on Human Relations on source of income discrimination complaints and CHA encourages HCV applicants and participants to file a complaint with the Commission if they believe they have been discriminated against.</p> <p>To your point, CHA does provide incentives for owners of units in Opportunity Areas to rent to voucher holders and these incentives include Exception Payment Standards (EPS), Landlord Incentive Payments, and a Property Tax Savings Program. The FY2018 Annual Plan details CHA's efforts to modify how EPS are administered, by first, increasing the current limit from 150% FMR to 250% in cases where it's needed as a Reasonable Accommodation. Secondly, CHA proposes changing the areas eligible for EPS from Opportunity Areas to Mobility Areas that will be based on community areas rather than census tracts, which should make the EPS process simpler for participants and owners. Finally, anytime CHA receives a complaint related to possible fraud or corruption in the inspections process or any other part of the process, CHA fully investigates the allegation, cooperating with the CHA Office of the Inspector General.</p>
2	Robert Whitfield	<ol style="list-style-type: none"> <li>1) The following are comments on CHA's Draft 2018 Moving to Work (MTW) Annual Plan. The CHA draft has language on page 20 indicating that CHA will select a development partner in 2018. This is an improvement over language in prior CHA MTW Annual Plans which sometimes contain no reference to LeClaire anywhere in the document. (See attached excerpts from prior CHA Annual MTW Plans.) However, given the extremely lengthy delays in starting development at LeClaire, CHA should consider adding additional language in the draft indicating time frames for specific actions.</li> <li>2) Also, CHA should recognize that LeClaire is unique in that it is the only family development where the CHA Board adopted a resolution providing relocation rights to residents of LeClaire Courts (a non public housing development which was located adjacent to the LeClaire public housing</li> </ol>	<ol style="list-style-type: none"> <li>1) Thank you for your comment.</li> <li>2) Thank you for your comment. CHA will continue to work with relocatees and adhere to our policies.</li> </ol>



		<p>development. (See attached addendum to the CHA Relocation Rights Contract (RRC)). CHA should consider amending the draft language to add the following language regarding the development of LeClaire.</p> <p>CHA should consider inserting specific time frames for drafting and approving the Request for Qualifications (RFQ) for selecting a developer for LeClaire. This should not be a lengthy process, and CHA should be able to utilize the draft LeClaire RFQ previously forwarded to the LeClaire Working Group in July, 2014. (See attached copy of the July 4, 2017 email sent to the LeClaire Working Group). The 2011 email had a revised LeClaire RFQ as an attachment.</p> <p>CHA should immediately convene the LeClaire Working Group and should ensure that LeClaire residents (or member of the Central Advisory Council (CAC) Board if no former LeClaire residents can be immediately located) are in all future LeClaire Working Group meetings.</p> <p>CHA should consider committing to additional outreach to locate former residents of LeClaire and LeClaire Courts to ensure they are aware that redevelopment of LeClaire will commence in 2018. CHA should also allow former LeClaire and LeClaire Court residents the opportunity to select LeClaire as their housing choice, even if they have already selected another development and or Section 8 as their housing choice. This would seem appropriate given the unusually lengthy delays that have occurred in the development of LeClaire, and the fact that LeClaire was demolished many years ago and is the only development that was demolished and where no meaningful development activity has taken place.</p>	
3	Cora Ward	<p>My question would be it appears that Ella Flagg is not on this list. Will it – we have not – this building has not been approved for RAD. So, how do we know this building, A, is – will be approved for RAD; and if so, will it be eligible for the vouchers?</p>	<p>Ella Flagg is tentatively scheduled to convert to RAD Project Based Vouchers in the summer of 2018. One year beyond the effective date of conversion (approximately summer 2019), residents will be able to request tenant-based vouchers if they choose.</p>
4	Chris White	<p>I'm on my lunch hour from North Side Community Resources, which just started having a fair housing program; but we have a number of housing programs.</p> <p>What we have been seeing on the North Side is that it is very difficult for vouchers – for vouchers and other CHA participants to come on the North Side. The rents are rising, there are not enough affordable units. The process is very cumbersome, and it's very hard to compete with a market-rate renter for a unit. Inspection process is very inconsistent.</p> <p>Sometimes a place will suddenly get – fail for no good reason, for painter's tape on a lamp, and another place will be quite horrible and consistently pass. There's the feeling that landlords that are seeking vouchers are the ones that get vouchers, and that it's difficult to</p>	<p>To provide an incentive for landlords to rent to voucher holders in low poverty areas, CHA implemented Exception Payment Standards, which allows an increased subsidy (up to 150% of Fair Market Rent) in Opportunity Areas. In addition, CHA recently implemented the Landlord Incentive Program which provides a one-time lump sum payment equal to the contract rent for each new lease up in Opportunity Areas. These programs are designed to make CHA voucher holders more competitive in the private rental market. Moreover, in the FY2018 MTW Annual Plan CHA is proposing to expand the areas eligible for these benefits, by encompassing entire Community Areas as opposed to only census tracts.</p>

		impossible for voucher-holders to get into regular market-rate housing.	
5	Mary Rosenberg, Access Living	<p>I'm a staff attorney at Access Living, which is a disability rights organization in Chicago that provides advocacy and services for people with disabilities. I just wanted to speak briefly to support the exception rent increase that CHA proposed in its Moving to Work plan.</p> <p>As an attorney at Access Living, I work exclusively with people with disabilities who often have difficulty finding housing because of the lack of accessible housing in Chicago. And we're -- as an aside, we're going to submit written comments with more detailed data about the lack of accessible housing for people with disabilities; but we often have to ask CHA for reasonable accommodations for more time to look for housing and also for exception rents. And as we all know, the accessible housing tends to be in higher income, higher rent areas.</p> <p>And so I'm thrilled that the CHA's going forward with the exception rents increase, so that will be easy for people with disabilities to have the same access to housing as their not disabled members.</p>	Thank you for your comment.
6	Sarah Delgado, Chicago Area Fair Housing Alliance	<p>I'm with the Chicago Area Fair Housing Alliance. Like Mary, I support the increase in the exception -- in the exception payment. We were a part -- we are a part of a working group that collaborated with University of Chicago to do -- some data and some research that showed that wheelchair-accessible units were much more expensive than inaccessible units; and the median rent for wheelchair accessible properties is \$576 to \$1,466 higher than the median rent for inaccessible units, which is 14 percent to 91 percent greater than maximum subsidy provided by the exception payment standard.</p> <p>So this corresponds to between 178 percent and 240 percent of the payment standard for 2017. So we just wanted to support the increase in the exception payment in the new Moving to Work plan.</p>	Thank you for your comment.
7	Mary Gill	<p>I'm Miss Mary Gill, and I'm a resident of the northeast scattered sites in the Uptown. And I'm interested in finding more about this homeownership unit assistance. Are you able to explain that to me today or...am I to get this information later?</p>	<p>CHA's Choose to Own Program (CTO) provides qualified public housing and HCV families with the opportunity to own a home. The CTO process is similar to the conventional home buying process, and families can purchase a family home, townhome, condo or cooperative anywhere in Chicago.</p> <p>Most CTO families utilize the voucher to pay a portion of their mortgage, the same way families use a voucher to pay a portion of their rent. CHA uses the Housing Assistance Payment to help families pay a portion of their monthly mortgage for up to 15 years (up to 30 years for the elderly or people with disabilities).</p> <p>If you would like any additional information on the CTO program, please contact CTO staff at 312-786-3404 or by email at <a href="mailto:CTOprogram@thecha.org">CTOprogram@thecha.org</a>. If you are interested in finding out how you can enroll</p>

			<p>in the program through CTO orientation sessions, please visit the following website: <a href="http://www.thecha.org/residents/services/choose-to-own-homeownership-program/">http://www.thecha.org/residents/services/choose-to-own-homeownership-program/</a></p> <p>In order to qualify for the program, families must:</p> <ul style="list-style-type: none"> <li>a) Meet or exceed the Median Family Income Limits for person(s) in the family household (seniors and persons with disabilities are exempt from this).</li> <li>b) Be credit worthy with scores of 640 or more and good credit history</li> <li>c) Have at least \$3,000 in savings with the capability of continuing to save</li> </ul>
8	Cora Ward	<p>1) My question is who will monitor the Housing Choice Voucher program?</p> <p>2) And number two, the -- the procurement process, if they decide to hire different agencies to do that, will they include minorities or people from other ethnic backgrounds? Since we have a -- since CHA has a high level of non-English-speaking tenants</p> <p>Because again, I live here, and like I said, we have a very high population of tenants from various ethnic backgrounds, various cultural settings. And it would be nice, somebody's in charge of a program, be able to communicate</p>	<p>1) The contract with the current vendors administering the HCV program expires next year. In the near future, CHA will be issuing an RFP (Request for Proposal) for the administration of the HCV Program and vendors will be chosen using a competitive process.</p> <p>2) Vendors administering the HCV Program must provide bilingual services for those with Limited English Proficiency. This is done through bilingual staff, telephonic translations, written translations or any other appropriate methods. For more information about CHA's language assistance policies and procedures, please visit the following links:</p> <p><a href="http://www.thecha.org/assets/1/22/08.10.15_CHA_Language_Access_Policy_Board_Approved.pdf">http://www.thecha.org/assets/1/22/08.10.15_CHA_Language_Access_Policy_Board_Approved.pdf</a></p> <p><a href="http://www.thecha.org/assets/1/22/10.21.15_CHA_Language_Access_Plan_at_a_Glance.pdf">http://www.thecha.org/assets/1/22/10.21.15_CHA_Language_Access_Plan_at_a_Glance.pdf</a></p>
9	Carolyn Moody	<p>1) What does MTW stand for?</p> <p>2) Do you know the status of Hattie Callner, as related to RAD? What about the leases? Will we have to sign new leases and for how long will those leases be for?</p>	<p>1) MTW stands for Moving to Work. In 2000 CHA and the Department of Housing and Urban Development (HUD) entered into the original MTW Agreement pursuant to the MTW legislation. Approximately 37 additional public housing agencies in the US have entered into an MTW Agreement with HUD. In part, the Agreement provides additional flexibility to housing agencies to develop and implement innovative housing policies that focus on creating opportunities for low-income residents. One of the requirements under the MTW Agreement is that on an annual basis, CHA will submit an Annual Plan to HUD, which details specific plans for the upcoming year.</p> <p>2) Hattie Callner is currently scheduled to convert to RAD Project-Based Voucher funding in spring 2018 which at this point is tentative and subject to change. At the time of conversion, new RAD PBV leases will be signed. The term of the lease will be 12 months, however, the re-examination schedule will be every two years or every three years, depending on the household's characteristics.</p>
10	Peggy Simon	<p>1) I live in Ella Flagg. We were told earlier that some of the residents that have been here for a while were going to be issued Section 8</p>	<p>1) Ella Flagg is tentatively scheduled to convert to RAD PBVs in the summer of 2018. One year beyond the effective date</p>



		<p>vouchers. And I don't know if that has anything to do with proposed annual plan that we have here today. When is the building being converted to RAD?</p> <p>2) And I would like to know if there are any upcoming repairs.</p>	<p>of conversion (approximately summer 2019), residents will be able to request tenant-based vouchers if they choose.</p> <p>2) There will be future construction at Ella Flagg related to its RAD conversion; however, no timeline for that work has been finalized.</p>
11	<p>Don Albrecht Carolyn (Cal) Montgomery Debra Gleason Laurel Kalsh Lisa Lew Shari Shaver J Beverly John Abbate James Watkins M.J. Conaway Suzen Riley Julie Falco Elise Roble Cassandra Malone Andrea Dinaro Alice Brewer Shirley Frierson Andrea Juracek Maria Starck Jenna Temkin Lydia Stazen Michael Jennie Fronczak Leanne Edwards Niketa Brar Marisa Novara Amanda Kass Sarah Duda Robert Smith III Charles Barlow Liliana Arielle Fey Aaron Barlow Nicole Yagoda Katie Bart</p>	<p>I am responding to your invitation to make a public comment on the Proposed 2018 Moving to Work Annual Plan that will increase the exception rent as a reasonable accommodation for people with disabilities who need accessible housing to 250% FMR. I fully support this proposal.</p> <p>There is very little affordable, accessible housing in Chicago. In addition, accessible housing is usually in opportunity areas where the rent is higher than CHA's regular payment standard. Because of this, it is very difficult for people with disabilities to find a place to live. For example, the median rent for wheelchair-accessible properties in Chicago is \$576 - \$1,466 higher than the median rent for inaccessible units and 14% - 91% greater than the maximum subsidy provided by the exception payment standard (i.e. 150% FMR).</p> <p>If CHA increases the exception rent for voucher holders with disabilities to 250% FMR, voucher holders with disabilities will have the same opportunity as non-disabled voucher holders to find housing. Thank you for giving me an opportunity to comment on CHA's proposal and for taking this issue seriously.</p>	<p>Thank you for your comment.</p>
12	Lorenzo Slater	<p>1) Elimination of Assets in Income Calculation after Initial Eligibility for HCV program.</p> <p>I agree with this initiative. It does remove the burden on program participants by decreasing the amount of documentation needed.</p> <p>2) Incentive Payments for Landlords in CHA Mobility Areas</p> <p>I agree with this initiative as well. It helps convince the landlord to rent to the participant considering they're getting paid for that one month of rent they might've lost waiting through the HCV process.</p> <p>3) 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.</p> <p>I somewhat agree with this initiative only because I understand this increase may be needed to make up for other expenses incurred by the program. On the participant</p>	<p>1-2) Thank you for your comments.</p> <p>3) The \$75 minimum rent was approved in 2008 and implemented for public housing and HCV participants in 2009. 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> <p>4) Thank you for your comment. CHA is committed to the creation of critical neighborhood amenities alongside mixed-income housing and CHA has participated in plans for new recreational facilities, resource centers, retail and libraries at many of its public housing and mixed-income properties. The agency plans to continue this strategy to ensure it is offering housing opportunities in vibrant neighborhoods.</p> <p>5) We appreciate your recommendations for the future use of this parcel and CHA will continue to evaluate all potential uses.</p>

		<p>side it may be a slight challenge dependent upon the type of hardship. Most previously may have had difficulties with the \$50 minimum rent, now viewing the \$75 minimum as an even more challenge for some.</p> <p>4) CHA plans to dispose of vacant land for future redevelopments for the ABLA, Cabrini, Horner, Robert Taylor Homes, Caroline Hedger Apartments, the Lawndale Complex, Stateway Gardens, Edith Spurlack Homes and Wicker Park Apartments.</p> <p>Is there a possibility to use the MTW single fund to build more community and/or job resource centers on the grounds of those developments. I understand that there is already some construction underway in regards to those developments at locations such as ABLA, Altgeld Murray Homes, Oakwood Shores and Pullman, in which they are implementing community and recreational facilities. I believe such developments and programs should be expanded and would be instrumental in getting area residents off the streets and into mainstream society. In addition, this would enable residents to become more secure and stable in their environments. Residents and youth being enrolled in job training programs provides them an opportunity to focus. This idea would also further the Public Housing Work Requirement goal.</p> <p>5) CHA plans to demolish the vacant two-story office building at 2610 W. North Ave. CHA is still evaluating its future use.</p> <p>Is there a possibility that the building be converted into SRO or studio type apartments to provide more affordable units to Chicago residents? The development can incorporate amenities such as furnished rooms, in-room bathrooms (as opposed to shared facilities) and on site social service providers who can offer counseling and job assistance. I believe the development can be more reminiscent of market rate apartments than transient housing. Subsidies can be provided to make the units affordable. The housing department can possibly increase its SRO funding in the budget for more affordable units. This idea will further CHA goal to create a solution to housing persons experiencing homelessness. This initiative can also be administered by a third party SRO Housing Corporation.</p> <p>Another suggested use for the building could be to simply make it a job or community resource center for area residents or youth. Just like I mentioned previously with the SRO's, the center can offer counseling and caseworkers to assist residents with finances and finding a job. It can also be used as a 12 step recovery program space and a health facility.</p> <p>My overall opinion of the plan is good. I like how CHA appears to be creating more self sufficiency programs and agendas and building community resources to increase its</p>	
--	--	--	--

		resident's chances of gaining employment. I'm also in heavy favor of the mixed -use environment that is being maintained throughout new developments.	
13	Michelle Gilbert, LAF	<p>Providing Child Support Hardship Exemption (pages 33-34)</p> <p>We support CHA's proposal to grant hardship exemptions to working families paying child support. However, this step only addresses a small piece of the problems with hardship exemptions and with calculating the rent of child support payors. We discuss later in these comments the problems with the hardship exemption. We recommend that CHA take the further step of disregarding the portion of the income of child support payors that is paid in child support - in recognition of the limited income of most CHA tenants and voucher participants, as well as the importance of paying support.</p>	Thank you for your comment.
14	Michelle Gilbert, LAF	<p>Modified Exception Payment Standard for Mobility Areas (pages 34-35)</p> <p>LAF, as members of CAFHA and its Housing Choice Voucher Working Group, support the plan to increase the payment standard for voucher participants living with disabilities and endorse the comments submitted by Access Living.</p> <p>CHA proposes "increasing the current limit from 150% FMR to 250%, only in cases where it's needed as a Reasonable Accommodation for households who need specific accessibility amenities." P. 34. CHA acknowledges that it has obtained waivers from HUD in the past but will not do so going forward, in part, because the process is time consuming. We encourage CHA to continue considering exceptions to the payment standard on a case by case basis. CHA's current payment standards trap residents in high poverty, high crime areas and further segregate the city.</p> <p>Further, reasonable accommodations should not be limited to "accessibility amenities." Accommodations may include being close to doctors, school, or other supportive services that enable disabled individuals to maintaining their quality of life.</p>	Thank you for your comment. 'Accessibility amenities' can include accommodations to be closer to health care providers or family. It is not limited to structural accessibility.
15	Michelle Gilbert, LAF	<p>Counting Project Based Vouchers toward unit delivery under the Plan (page 38)</p> <p>1) LAF is concerned about CHA's plans for counting unit delivery. As we have stated in previous comments, PBV units should only count toward the 25,000 units if they will be available to families with a Right of Return (i.e., 10/1/99 families), rather than people on the PBV waiting list and other special populations, such as formerly homeless people or people who need additional supportive services.</p> <p>CHA has committed to replacing 25,000 housing units as part of the original Plan for</p>	<p>1) The senior units within CHA's RAD PBV portfolio will not be counted as net new units towards the 25,000 housing unit goal. Newly developed and/or acquired units utilizing RAD PBV as a funding vehicle will be counted towards the 25,000-unit goal, as these are new units that will be absorbed in CHA's portfolio.</p> <p>2) RAD2 units create new opportunities for CHA waitlist residents who will have the first opportunity to fill vacancies. It is anticipated that 100 TBD units will be assisted through the Property Rental Assistance (PRA) program and 100</p>

		<p>Transformation and the MTW Agreement obligations. We are troubled by CHA's proposal to include units converted under RAD towards the 25,000 unit goal. Any currently occupied units that are converted under RAD should not count towards the unit delivery goal as these conversions do not add to the total number of available units. Furthermore, CHA has indicated that, other than the Homer Superblock, it does not currently plan to substantially rehabilitate occupied RAD properties as CHA does not plan off-site temporary displacement of residents. Plan at 96. Therefore, the "rehabilitation" of units converted under RAD will not be substantial and will not result in a net increase of available units.</p> <p>2) 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 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 units.</p> <p>CHA only proposes adding 808 units of public housing and PBV units towards the 25,000 goal. The 560 PBV units that will be "preserved" (including 200 through Mod Rehab conversions) should not count towards the goal.</p> <p>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>	property-based TBD RAD2 units will be created during 2018.
16	Michelle Gilbert, LAF	<p>Minimum Rent (pages 41-42)</p> <p>CHA should amend its MTW plan to eliminate minimum rent. Property Managers and Housing Specialists do not properly screen residents who qualify for the minimum rent hardship exemption, do not notify residents and participants that the exemption is available, and delay in qualifying residents for the exemption. We often find that families need the intervention of an attorney to assert their right to a hardship exemption. In one recent case, a voucher participant faced eviction for two months while a housing specialist determined whether she qualified for the hardship exemption despite the fact that the participant had suffered a terrible accident and could not possibly work. Without</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>question, CHA families face eviction and voucher termination because they are unable to pay minimum rent. The bureaucratic cost of investigating whether tenants qualify for the hardship exemption surely outweighs any small amount that CHA benefits from the modest rent gained.</p> <p>Ironically, CHA recognizes (and proposes to spend \$800,000 to support the notion that) small grants can keep families housed. CHA should not allow small amounts of rent (\$50, even \$75) to lead to the eviction of CHA tenants. CHA should not attempt to achieve its MTW objective on the backs of some of the poorest program participants who are also struggling to pay utilities and other necessary expenses. Finally, as we have commented in the past, CHA has never received proper authority to increase the minimum rent in the Voucher Program from \$50 to \$75, which it admits here, acknowledging that it was approved "through the 2008 HCV Administrative Plan."</p>	
17	Michelle Gilbert, LAF	<p>CHA Re-entry Pilot Program (page 45)</p> <p>1) CHA previously approved its Re-entry Pilot Approved program in 2014. CHA remains committed to working with designated/approved re-entry program partners to identify families that qualify for the program. CHA must implement a plan to notify and inform families that the Pilot Program exists.</p> <p>2) CHA's "drug free" requirement also appears overly broad and may discriminate against persons with disabilities.</p>	<p>1) Thank you for your comment. Notification regarding the pilot program was completed. CHA also relies on its pilot service providers to talk about the program to their participants.</p> <p>2) Current users of illegal controlled substances are not considered disabled under the Fair Housing Act, the ADA or Section 504 of the Rehabilitation Act.</p>
18	Michelle Gilbert, LAF	<p>Mobility Counseling Demonstration Program (pages 46-49)</p> <p>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, 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, CHA should focus its efforts on helping participants find quality, affordable housing in opportunity areas (such as making security deposit grants) and recruiting quality landlords with quality properties to participate.</p> <p>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</p>	<p>Thank you for your feedback. Since implementing this activity, we have seen no adverse impact on the pilot program participants. As noted in the activity description the target population for this Demonstration program were applicants on the public housing wait list and therefore would be subject to the CHA Work Requirement.</p>

		<p>see, however, that CHA is proposing to increase Safe Harbor to 180 days.</p> <p>On the other hand, we support the plan to give MCD participants a 150-day search time from the time the voucher is issued, rather than requiring participants to request extensions. This decision recognizes the longer search terms voucher holders need to find housing in CHA's Opportunity Areas, and we believe CHA should give all participants longer search times.</p>	
19	Michelle Gilbert, LAF	<p>Mixed-income Ombudsman (pages 54-55)</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. For instance, the FY2018 benchmark for regional meetings to engage residents is only 4 meetings for mixed-income residents.</p> <p>While this is 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>	The Ombudsman is to recognize spokespersons for mixed-income resident groups as permitted under the MTW Agreement.
20	Michelle Gilbert, LAF	<p>HCV Owner Incentives (pages 55-58)</p> <p>LAF supports efforts to recruit and retain landlords in the Voucher Program, such as the Owner Excellence Program and the vacancy payments. We urge CHA to adopt the vacancy payments throughout the city and not just in Mobility Areas. While we encourage tenants to move to opportunity areas, based on their own desire – in reality, good owners throughout the city choose not to participate in the program because of the wait time for inspections and HAP contracts.</p> <p>We urge CHA to establish a pilot, under the authority in the Housing Opportunity Through Modernization Act of 2016 ("HOTMA"), to allow voucher participants to occupy premises prior to the home meeting HQS if the fails are for non-life-threatening HQS deficiencies and to pay landlords for this occupancy. Good</p>	Thank you for your comment. CHA is considering moving forward with implementing a policy that will allow a voucher holder to move into a unit prior to passing HQS, as long as there are no emergency fail items. In addition, Vacancy Payments are available to all CHA owners, irrespective of where the unit is located. The requirements to qualify are based on their inspection performance.

		landlords do not want properties empty for 51 days—it is a common reason why landlords will not consider voucher participants. Of course, CHA needs to take precautions that the pilot does not result in tenants occupying substandard housing and the voucher expiration “clock” must be stopped during the entire inspection period.	
21	Michelle Gilbert, LAF	EID in RAD Developments (pages 60-61)  We support CHA's plan to request MTW approval to carry over the EID upon RAD conversion.	Thank you for your comment.
22	Michelle Gilbert, LAF	Putting the Time Limit Demonstration on Hold (pages 67-69)  LAF opposes implementation of a time-limit demonstration for the Housing Choice Voucher program, and we are encouraged to see that CHA has decided to put this program on hold for FY2018. It should be put on hold indefinitely.  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.	Thank you for your comment. As noted, this activity is on hold for FY2018 and CHA is evaluating whether this activity will be pursued in the future.
23	Michelle Gilbert, LAF	Waitlist Preferences for Victims under VAWA (addition)  Historically, CHA has implemented its obligations under VAWA as broadly as possible to ensure that victims of abuse are protected to the fullest extent possible. CHA had	Thank you for your comment. The public comment period for the CHA's Administrative Plan will be announced shortly and should be taking place during fall 2017. Please submit comments regarding waitlist preferences during the Administrative Plan public comment period.



		<p>previously implemented an admissions preference for victims of domestic violence on its Public Housing waitlists. The VAWA Final Rule made clear that PHAs may expand such preferences to include other victims who now qualify under VAWA, including victims of sexual assault and stalking. See 24 CFR 960.206(b)(4), 982.207(b)(4); Violence Against Women Reauthorization Act of 2013 Guidance, PIH-2017-08 (May 19, 2017) at 37. Accordingly, CHA should expand its existing admissions preference for victims of domestic violence to include all individuals who qualify under VAWA, including sexual assault and stalking victims, to ensure that all victims who qualify under VAWA are afforded the same rights.</p> <p>Similarly, CHA should implement a waitlist priority for victims of domestic violence, sexual assault and stalking on its Housing Choice Voucher waitlist. Given CHA's past commitment to implementing VAWA broadly, it is surprising that CHA has not proposed adoption of this preference, which is encouraged under VAWA 2013. CHA should also ensure that its local housing needs assessment specifically include people experiencing domestic violence, sexual assault, and stalking. A 2017 Domestic Violence Needs Assessment of Chicago found that safe and affordable housing remains one of the most consistent unmet needs identified by domestic violence service providers. O'Brien, M (2017, July). Connecting to Safety and Stability: Domestic Violence Needs Assessment of Chicago, 41, available at <a href="http://www.heartlandalliance.org/research">www.heartlandalliance.org/research</a>. Implementation of a HCVP waitlist would be an important step towards a "Housing First" approach to stabilizing families experiencing abuse.</p> <p>A clear VAWA waitlist priority for the HCVP would also ensure that CHA can implement a workable VAWA Emergency Transfer Plan for tenants in PBV units. With CHA's plans to convert thousands of public housing units to the PBV program under RAD, a clear mechanism for ensuring that victims seeking emergency transfers from PBV units needs to be established. If victims have been living in a PBV unit for more than one year, they qualify for tenant-based assistance under the HCVP and should be given a priority on that waitlist based on their qualifications under VAWA. In such circumstances, the PHA must give the victim priority to receive the next available opportunity for continued tenant-based rental assistance. See 24 CFR 983.261; Violence Against Women Reauthorization Act of 2013 Guidance, PIH-2017-08 (May 19, 2017) at 26. Without an admissions priority for victims who qualify under VAWA, as a practical matter, it will be impossible for CHA to ensure that victims receive the next available voucher because of CHA's long waitlists for the Voucher Program.</p>	
--	--	--	--



24	Michelle Gilbert, LAF	<p>Affirmatively Furthering Fair Housing (pages 89-90)</p> <p>Discrimination against voucher holders is well-documented and clearly impacts voucher participants as people of color and parents of children. In 2010, CHA contracted with the Chicago Lawyers' Committee for Civil Rights Under Law to study discrimination in the Housing Choice Voucher Program. The study found that 59% of the landlords who already participated in the Voucher Program discriminated against new voucher holders. Studying areas with improved economic opportunity, the research found that 55% of these landlords refused to accept vouchers from white testers. Of the landlords willing to accept the voucher from white participants, 53% of those landlords refused to accept the voucher from African-American voucher tenants.</p> <p>Proposals like the vacancy payment will increase landlord participation. CHA, however, must adopt proposals that directly benefit voucher holders and not just voucher landlords. Specifically, as CAFHA has recommended, CHA should increase search time and should specifically consider discrimination against voucher holders in granting voucher extensions so that tenants do not risk losing their housing assistance while they either search for suitable housing or file complaints to combat housing discrimination. Advocates realize that the combination of discrimination and limited search times cause some families to lose housing assistance or be forced to choose substandard housing in segregated, poor neighborhoods. Researchers who study housing mobility specifically recommend increasing voucher search time as a tool for increasing utilization and economic mobility. DeLuca, et al., <i>Why Don't Vouchers Do a Better Job of Deconcentrating Poverty?</i> POVERTY &amp; RACE (Sept./Oct. 2012); Poverty &amp; Race Research Action Council, <i>Expanding Choice: Practical Strategies for Building a Successful Housing Mobility Program</i> (February 2013) at 8.</p> <p>As CHA works with the Housing Authority of Cook County and county government generally on the regional Assessment of Fair Housing (AFH), CHA must adapt strategies that increase portability of vouchers. For example, we have seen too many clients lose voucher assistance because they request an extension during the term of the voucher as assigned by the receiving jurisdiction – which, by regulation, is 30 days beyond the voucher termination date as set by CHA as the porting jurisdiction.</p> <p>LAF recognizes CHA's participation in CAFHA's voucher working group and the work of the Housing Rights and Non-Discrimination Department staff generally. Still, CHA must work to improve education to voucher holders about source of income discrimination protection. Specifically, CHA should make</p>	<p>Thank you for your comment. At CHA Briefings voucher holders are provided information on the City of Chicago's Source of Income Ordinance. In addition, as part of our upcoming Administrative Plan changes, we are proposing to increase the length of the voucher search time from 90 to 120 days.</p>
----	-----------------------	---	---

		clear to tenants that voicing a concern to CHA's staff does not initiate a charge of discrimination with the Chicago Commission on Human Relations.	
25	Michelle Gilbert, LAF	<p>Improved Transparency and Education Related to RAD Conversion Process (pages 91-95)</p> <p>The RAD conversion process thus far has been confusing for tenants and advocates. CHA website provides little information about the status of RAD conversions. The website also lacks information about RAD leases and RAD grievance procedures and other policies even though they were approved in 2015. According to the Draft Plan, CHA has already converted several senior housing properties under RAD in 2017 and the Horner Westhaven Superblock in 2016. Despite the RAD conversion having already been completed, tenants at these properties are not aware of the RAD conversion or its implications upon their tenancies. To the tenants, it just appears that the building has changed property managers, which is an all too common experience for public housing residents. CHA should take affirmative steps to ensure that tenants are made aware of the changes that are occurring under RAD conversions, including but not limited to: the phase in of tenant rent increases, effects on the Earned Income Disregard, modified grievance rights, and Choice Mobility. CHA should accomplish this goal through written materials that are appropriately tailored to varied literacy level, education workshops and seminars. CHA must also modify the CHA website to include all documents related to RAD and updated information about the status of RAD conversions that remain underway.</p> <p>CHA can further ensure that residents are well informed by involving residents in the RAD conversion process well in advance. CHA can:</p> <ul style="list-style-type: none"> <li>• Conduct ongoing resident information sessions. In the past ('13) CHA conducted resident information sessions over the course of one month. CHA should instead conduct the information sessions over an extended period of time, educating residents on each stage of the process, resident relocation rights, estimates of the length of relocation, and assure residents of their right to return to the property being rehabbed.</li> <li>• Educate, train, and provide resident and staff ambassador that are available to answer questions and keep families informed.</li> <li>• Send monthly newsletters to residents.</li> <li>• Notify Resident councils, resident advisory boards (RABs), and other organizations about ongoing efforts to convert RAD properties as well as opportunities to engage them.</li> </ul> <p>CHA must also ensure that it has a plan in place to meet with residents after CHA signs its CHAP contract.</p>	<p>CHA staff regularly attends the Senior Housing Advisory Council meetings, which includes building council representatives from CHA's senior buildings, to provide updates on the RAD program. Information typically shared during these meetings includes the sequence of properties that are transitioning to RAD PBV funding, a review of resident benefits and changes, and addressing Frequently Asked Questions (FAQ) – particularly the "opt-out" election of a tenant-based voucher. CHA is in the process of updating its webpage to include a refreshed FAQ, an excerpt of the MTW Plan specific to RAD that includes rent phase-ins, policy concerning the Earned Income Disregard (EID) program and Choice Mobility. Moreover, CHA is required to meet with residents at least twice prior to conversion. CHA staff, alongside property management, hosts a meeting in each building pending conversion (before submission of construction and financing plans to HUD) and meets with residents a second time before the formal conversion to review lease and policy changes, including updates to the grievance policy. After the conversion, CHA is initiating a pre-anniversary meeting with senior residents to gather feedback on the conversion process and gauge interest in exercising Choice Mobility (transferring to the tenant-based voucher program).</p>

26	Debra Parker	<p>RE: Modified FSS Program for HCV and Public Housing:</p> <p>CHA Proposed modification to FSS escrow savings , should compliment the current Program , by adding and including additional approaches. Modifications by choosing one over the other , may not meet the needs of all current and future participants.</p> <p>The fact that most CHA HCV(10-1-99) and Public Housing Residents, has already reached certain milestones as high school grads, GED recipients, Associates degrees and employed full time, this modification will lessen their chances of creating a large accrual of funds. Prior to reaching full time employment , their rents are set. Once, the household income improves , the rents are re-calculated and raised ( HCV only allows Earned income disregard for ADA Participants).So keeping in place the current rule of rent increase accrual , will serve that group well. The proposed incentive savings model work best for residents that are further behind the average CHA working family. SO, please consider ADDING to the program in your attempt the maximize the full benefits in which the Family Self Sufficiency Program , was intended for and that's , that it continue to serve as a means to real self sufficiency.</p>	<p>CHA's FSS program is open to all public housing and Housing Choice Voucher program participants (including Project Based Voucher and Rental Assistance Demonstration program households). The proposed escrow savings model will enable all FSS participants who are engaged and complete the FSS program the opportunity to accrue escrow savings, regardless of their current or achieved income level. Individual FSS program goals are established by each participant in coordination with an FSS Coordinator. If an FSS participant already has a degree and/or is already employed they may set other personal goals while in the program that will also result in escrow savings accrual, including completing training to advance in their career path, increasing personal savings, improving personal credit and working toward homeownership. Additionally, if a participant is currently employed when enrolling in the FSS program, they will have the opportunity to achieve escrow savings through a pay point for employment retention. In the current draft pay point model, participants will actually accrue more escrow for employment retention than obtaining a new job. The proposed escrow savings model will enable a participant to plan for how much escrow they will accrue based on their personal program goal, rather than household income increases which may be difficult to accurately predict or control.</p>
27	Sarah Song, LAF on behalf of the Cabrini Green Local Advisory Council	<p>The CGLAC opposes CHA's proposed demolition of the Francis Cabrini Rowhouses, even if it is only a "possible" demolition. As was previously submitted, the Rowhouses are subject to a settlement agreement in the Gautreaux litigation, and CHA's "possible" demolition proposal is premature, especially since CHA has not issued any Request for Proposals and no firm plans for implementation have been set.</p>	<p>Thank you for your comment. Any pending actions involving properties are included in the MTW Annual Plan for submittal to HUD. CHA included the potential demolition of the Rowhouses in its Approved 2017 MTW Annual Plan. That avoided the CHA having to complete an MTW amendment, comment period, and await another HUD approval which can delay construction/rehabilitation of units. CHA is aware and remains committed to compliance with the settlement order.</p>
28	Sarah Song, LAF on behalf of the Cabrini Green Local Advisory Council	<p>Throughout the FY2017 CHA MTW Annual Plan, CHA stated that it was only including the 440 offline Rowhouse units in its 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." FY2017 CHA MTW Annual Plan, pp. 15, 16, and 21.</p> <p>In response to LAF's comments regarding this "possible" demolition, CHA reiterated its intent to include the Rowhouse units in the demolition plan "only in the event the selected Developer recommends any demolition."</p> <p>Since the FY2017 CHA MTW Annual Plan was approved, CHA has not issued any solicitations for a developer for the Rowhouses. Likewise, the settlement agreement entered in Gautreaux litigation which provides, in part, that the future of the Rowhouses will be decided in the context of a</p>	<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. CHA has added language to the FY2018 MTW Annual Plan indicating that CHA's redevelopment activities at the property will be undertaken in compliance with the existing Memorandum of Agreement and Court Order regarding development of this site.</p>

		<p>Request for Proposals from the Near North Working Group, has not been changed, and CHA is still subject to that settlement agreement.</p> <p>However, in its FY2018 MTW Annual Plan, CHA states unequivocally that it proposed to demolish the Frances Cabrini Rowhouses without any of the limitations or reservations stated in the FY2017 MTW Annual Plan. This is incorrect, and CHA should revise the language in the FY2018 MTW Annual Plan to make very clear that the proposed demolition of the Rowhouses is only in the event that the development process in the context of a Request for Proposals from the Near North Working group results in a decision or need to demolish any Rowhouse units.</p> <p>The FY2018 MTW Annual Plan also states that "CHA will work with the Illinois Housing Preservation Agency (IHPA) and the Chicago Department of Facilities and Fleet Management (2FM) and other stakeholders to determine CHA's redevelopment activities in the property." CHA should make clear that the CGLAC is a stakeholder that will participate in determining CHA's redevelopment activities for the Frances Cabrini Rowhouses.</p>	
29	Scott Holzrichter	<p>If such as Hattie Callner Apartments—(identified with PICAMP IL002048000 as a PBV RAD type of public housing development at page 94 of CHA's "Proposed FY2018 MTW Annual Plan")—were indeed converted to Project Based Voucher assistance under RAD using the Resident Ombudsman model referenced on page 2 under "Add after Section 23" in your Proposed Amendment to Attachment D (attached), it seems appropriate that notice should be required to be posted in respective common areas informing residents of their right, if not already exercised, to establish and operate a resident organization in accordance with 24 CFR Part 245, etc., if and when Section 23 is actually added to Attachment D.</p>	<p>While Hattie Callner is listed as one of multiple properties that CHA received HUD authorization to convert to Project-Based Voucher (PBV) funding, it has not yet completed the transition. For now the property is still designated as a Public Housing property. Once Hattie Callner's official conversion process begins, CHA staff will meet with residents and distribute written materials concerning the anticipated changes under the RAD PBV program and information on residents' rights, including but not limited to the continued recognition of the LAC, CAC and SHAC organizations within CHA senior buildings.</p>
30	Madeleine Hamlin, BPI	<p>The draft plan (pp. 7, 34) proposes changing the areas eligible for Exception Payment Standards from the current Opportunity Areas, which are based on census tracts, to "Mobility Areas" based on community areas. While we agree that the current Opportunity Map should be updated, and we are in active discussions with CHA to do so with the hope of increasing the portion of the city so designated, we do not support a map based on community areas. Chicago's community areas are very large and often contain both large sections that are Opportunity Areas and large sections that are not. Designating entire community areas as mobility areas would have the undesirable consequence of encouraging families to seek housing in some neighborhoods that may be characterized by high poverty, high crime, poor schools, and the like. Moreover, most Chicago residents do not identify their neighborhoods based on community areas, so changing the map in this way would not assist residents in searching</p>	<p>Thank you for your comment.</p>

		for housing. Finally, we are concerned that having different maps governing CHA's mobility and development programs would add confusion to an already complex set of programs. We look forward to continuing our discussions with CHA to arrive at an updated and appropriate Opportunity Area map, and urge CHA not to adopt different "Mobility Areas."	
31	Madeleine Hamlin, BPI	The draft also proposes (p. 34) to increase the ceiling on the Exception Payment Standards for households who have an approved need for a reasonable accommodation and propose moving to an opportunity area. BPI supports raising the ceiling for such households.	Thank you for your comment.
32	Madeleine Hamlin, BPI	CHA proposes to transition to site-based wait lists for all of its properties. (We note that the draft contains two different schedules for doing so, on pp. 26 and 28.) As we have previously observed, moving to a site-based system would violate existing Gautreaux court orders. Nevertheless, BPI supports the transition if done with appropriate controls and monitoring. The new system must of course be approved by the Gautreaux court before it is implemented. BPI supports CHA's intention to create a more efficient waitlist system that would enable applicants to move more quickly to their preferred locations and looks forward to our continued discussions on this topic.	Thank you for your comment. Please note the discrepancy you referenced has been corrected.
33	Madeleine Hamlin, BPI	As it did last year, CHA is proposing (p. 21) to convert Pope Elementary School into CHA office space and housing. CHA does not specify whether it intends CHA family units for the site. If that is the intention, CHA will have to first provide matching family units in Gautreaux General Areas, as Pope is located in a Gautreaux Limited Area. The same would be true of any other Limited Area family units proposed by CHA. If CHA intends to develop senior units at the Pope site, a court order would be required unless such units are among the 105 already authorized by the 12/22/16 Agreed Order of the Gautreaux court.	CHA is developing plans for Pope Elementary School and CHA will comply with Gautreaux requirements, if applicable.
34	Madeleine Hamlin, BPI	CHA notes (p. 26) that screening and eligibility requirements create a barrier to public housing leasing. At some properties, site-based screening criteria may be overly broad and restrictive. We suggest that CHA review its policies about such screening criteria, particularly with regard to credit and criminal background checks, to ensure that property managers are screening only for factors relevant to an applicant's ability to make rent and other necessary payments and to abide by house rules.	Thank you for your comment.
35	Madeleine Hamlin, BPI	CHA is requesting authority to enter into PBV contracts that would last up to 40 years, an increase over the current 30-year maximum. BPI supports this request. (We note that on p. 35 the draft has two different terms listed: 21-40 years and 16-40 years.)	Thank you for your comment.
36	Madeleine Hamlin, BPI	BPI applauds CHA's proposal (p. 63) to work with the City of Chicago and the Continuum of Care to help house persons experiencing homelessness. CHA's role has substantially changed over the last two decades as it no longer functions as the primary "houser of last	Thank you for your comment.

		resort." However, CHA housing subsidies are critical to an effort to provide supportive housing in conjunction with other agencies that offer the additional services needed to address this important issue effectively.	
37	Mary Rosenberg. Access Living	<p>1) On behalf of the undersigned groups, we write to comment on the Proposed 2018 Moving to Work Annual Plan, published for comment on August 1, 2017. In particular, this comment focuses on the proposed Modified Exception Payment Standards/Altering Mobility Area Map (2010-02) described on pgs 34-5 of the Plan.</p> <p>For the past year, the Chicago Area Fair Housing Alliance, a consortium of fair housing organizations in and around Chicago, has established a Housing Choice Voucher work group to specifically address the discrimination voucher holders face when seeking housing. One focus identified by the Housing Choice Voucher group is the particular issues voucher holders with disabilities confront when seeking housing: (a) the dearth of affordable, accessible housing in Chicago and (b) the wide gap between the cost of accessible housing and the amount approved by CHA as a reasonable accommodation for people with disabilities.</p> <p>People with disabilities face many barriers to housing. As noted by the Chicago Metropolitan Agency for Planning, people with disabilities confront the "affordability" barrier, "limited housing accessibility" and "blatant discrimination when seeking housing in the region."</p> <p>The lack of affordable housing across the country has been well-documented. Nationwide, only 39 affordable units exist for every 100 extremely low-income renters. Moreover, there are only 32 units per 100 extremely low-income renters in Illinois and 26 units per 100 extremely low-income renters in the Chicago metropolitan area. The affordable housing crisis is particularly problematic for the disability community, which is largely low-income and unemployed. Indeed, the City of Chicago notes that "[t]he dual [sic] effect of a low income and decreasing affordable housing stock has proven extremely problematic to ... those with disabilities."</p> <p>There is also a dire lack of physically accessible housing. Specifically, less than 5% of the nation's housing stock is accessible to those with moderate physical disabilities and less than 1% is accessible to those who use wheelchairs." The Chicago housing stock is old. Of all housing units in Chicago, 44% were built before 1940, well before the federal Fair Housing Act required new multi-family housing to include basic elements of accessibility. Also, 31% of units in Chicago are in structures with two or more units and most of these are in multi-story buildings. These multi-story units typically include stairs. In summary, a substantial number of units in Chicago "are</p>	Thank you for your comment.



		<p>not easily accessible by persons with disabilities."</p> <p>People with disabilities also face a high degree of housing discrimination. HUD's 2015 Disability Discrimination Study (HUD Study) found that people who are deaf or hard of hearing and people who use wheelchairs confront discrimination at various stages of their search process. According to the Study: <i>When well-qualified homeseekers who are deaf or hard of hearing contact housing providers and use assistive communication technologies to inquire about recently advertised rental housing, providers are less likely to respond to their inquiries ...</i></p> <p><i>Well-qualified homeseekers who use wheelchairs are more likely than comparably qualified homeseekers who are ambulatory to be denied an appointment to view recently advertised rental housing in buildings with accessible units.</i></p> <p>The findings of the HUD Study are borne out by the high percentage of disability-based housing complaints filed with HUD. For the last several years, the largest percentage of those complaints concerned allegations of disability-based discrimination. In FY 2013, 53% of those complaints alleged disability-based discrimination. In FY 2012 the percentage was 56%, and in FY 2011 the percentage was 55%. <sup>1</sup>People with psychiatric, learning, and other disabilities also experience discrimination, according to cases filed in federal court and with HUD.</p> <p>In 2016, the City of Chicago issued its Analysis of Impediments to Fair Housing Choice (Chicago AI), which identified eleven impediments. Those directly related to disability issues include: (1) lack of awareness of fair housing laws; (2) prevalent "fear of Others" exists among residents, including NIMBYism<sup>18</sup> and discrimination persists; (3) insufficient supply of affordable housing; (4) limited and/or inconsistent coordination among some city departments; (5) certain city policies and procedures do not encourage fair housing; (6) lack of a systemic approach to fair housing planning; (7) real estate professionals have no explicit role in furthering fair housing; and (8) highly segregated communities in the City of Chicago.</p>	
38	Mary Rosenberg, Access Living	<p>Exception Rent Background</p> <p>In 2010, CHA received approval from the U.S. Department of Housing and Urban Development (HUD) to self-certify exception rents up to 300% of HUD's published FMR for Chicago on a unit-by-unit basis as part of its Moving to Work Agreement. However, in its proposed 2015 Moving to Work Plan, CHA capped the amount of exception rents at 150% FMR in response to negative publicity over the exception rent program.</p>	CHA recognizes that receiving approval from HUD for an Exception Payment Standard exceeding 150% FMR is time consuming and has significant negative impacts on the owner and voucher holder. For that reason, CHA's proposed FY2018 MTW Plan includes an activity that would allow CHA to go up to 250% of FMR if necessary due to accessibility needs without obtaining additional HUD approval.

		<p>As a result of this policy change, if a voucher holder with a disability requests an exception rent over 150% FMR as a reasonable accommodation under the Fair Housing Act (FHA), under HUD's policies, that request must be sent to HUD Headquarters in Washington, D. C. for approval. These reasonable accommodation requests can take up to six months to approve. Given that the moving and inspection process for voucher holders is already rife with delays, adding an additional months-long delay to the housing search all but ensures that the voucher holder will lose the apartment. This is particularly problematic for people with disabilities because the options for accessible housing are so limited.</p>	
39	Mary Rosenberg, Access Living	<p>People with Disabilities Need a Higher Exception Rent</p> <p>There is a dearth of affordable, accessible housing in Chicago. The federal Fair Housing Act has accessibility requirements for buildings constructed after March 1991. However, as described above, the majority of housing in Chicago predates these requirements. In addition, those buildings constructed since passage of the FHA's accessibility requirements often are in opportunity areas, where the rent far exceeds not only CHA's regular payment standards, but also the 150% FMR exception payment currently authorized under CHA's Moving to Work Plan.</p> <p>In 2017, the Chicago Policy Research Team at the University of Chicago conducted a study of the housing choice voucher program, including, among other things, the discrepancy in cost between wheelchair accessible units and inaccessible units . The Team conducted a point-in-time analysis of all properties advertised on Apmtments.com in April 2017. The analysis was of apartments listed on www.apmtments.com, because that is the only major rental website allows users to list wheelchair accessibility as a search criterion.</p> <p>The results of their analysis were staggering. Of the 2,842 properties in Chicago with studio through four-bedroom units for rent, only 301 properties, or about 11%, were wheelchair accessible. Sixty-eight of those units were located in Opportunity Areas. In addition, wheelchair-accessible units were much more expensive than inaccessible units. The median rent for wheelchair-accessible properties is \$576- \$1,466 higher than the median rent for inaccessible units and 14% - 91% greater than the maximum subsidy provided by the exception payment standard (i.e. 150% FMR). This corresponds to between 178 and 240% of the payment standard for 2017.</p> <p>As a result, at even the 150% FMR exception payment standard, people with disabilities have access to a much smaller percentage of</p>	Thank you for your comment.



		<p>the housing market than their non-disabled counterparts, illustrated by the chart below.</p> <p>Percentage of housing market available to voucher holders in Opportunity Areas</p> <p>Bedrooms 0 - 150% FMR / 55.8%, 150% FMR Accessible / 18.1%</p> <p>Bedrooms 1 - 150% FMR / 38.5%, 150% FMR Accessible / 8.2%</p> <p>Bedrooms 2 - 150% FMR / 40.4%, 150% FMR Accessible / 5.2%</p> <p>Bedrooms 3 - 150% FMR / 30.1%, 150% FMR Accessible / 1.6%</p> <p>The study found that for studio units in opportunity areas, at 150% FMR, a non-disabled voucher holder would have access to 55.8% of available units. In contrast, a voucher holder who required a wheelchair-accessible unit would only have access to 18.1% of available units. For a voucher holder seeking a three-bedroom unit, 30% of available units would be available to voucher holders without disabilities, while only 1.6% of units would be available to voucher holders with disabilities.</p> <p>Voucher holders with and without disabilities should have access to a greater percentage of the rental market than in the chart above. However, in order to level the playing field between voucher holders with disabilities and voucher holders without disabilities, it is critical that CHA increase its exception payment standard for people with disabilities as a reasonable accommodation. Doing so will both increase the number of accessible units available to voucher holders with disabilities as well as decrease the delay in the reasonable accommodation approval process so that when people with disabilities find accessible units, they are more likely to be able to lease them.</p>	
40	<p>Curtis Harris Jr. Ashlen Olmsted Jesus Compezano Michael Harvey Robert Rudner Laura Donaldson</p>	<p>I am responding to your invitation to make a public comment on the Proposed 2018 Moving to Work Annual Plan that will increase the exception rent as a reasonable accommodation for people with disabilities who need accessible housing to 250% FMR. I fully support this proposal. I am a person with a disability or have a person with a disability in my household and I need accessible housing.</p> <p>There is very little affordable, accessible housing in Chicago. In addition, accessible housing is usually in opportunity areas where the rent is higher than CHA's regular payment standard. Because of this, it is very difficult to find a place to live. If CHA increases the exception rent for voucher holders with disabilities, voucher holders with disabilities will have the same opportunity as non-disabled voucher holders to find housing. Thank you for giving me an opportunity to comment on CHA's proposal and for taking this issue seriously.</p>	<p>Thank you for your comment.</p>

***Public Comment Info and Grid—Plan Amendment***

Prior to submission of the Proposed Amended FY2018 MTW Annual Plan for CHA Board approval, a 30-day public comment period was conducted from April 6th through May 7th, 2018. CHA held two public hearings during the comment period: (1) on April 17<sup>th</sup> at the Charles Hayes Family Investment Center, 4859 S. Wabash; and (2) on April 20<sup>th</sup> at CHA Headquarters, 60 E. Van Buren. A total of 3 people participated in these hearings. The following table includes public comments and CHA responses.

**Proposed FY2018 MTW Annual Plan Amendment**  
**Public Comment Period: April 6 - May 7, 2018**  
**Public Comment Hearings: April 17, FIC 6:00p & April 20, 2018, CHA Headquarters**

Comment #	Individual/ Organization	Comment	CHA Response
1	William Cordero, 459 W Division apt. 504, 312-532- 0079.	Hello, my name is William Cordero and I live in a subsidized apartment thru CHA. I have been living there since 2016. The building management has been coming up short in my and some other tenant's opinion. We do not get communication from management when problems occur and are waiting to get fixed. This causes anxiety, frustration and anger at management by the tenants. For example, they promised to have our intercom system fixed in one week-right now it is going on 3 weeks with no updates from them to us to let us know what is going on. With no intercom, we have safety issues, emergency issues, and it is difficult for handicap people to go downstairs to let people in. I would like to be able to know who and how to contact someone at CHA when we feel management is not doing their job.	CHA takes feedback seriously and we are continuously looking for ways to improve the service provided to residents. Staff will contact you regarding your concerns. In the future, you may contact CHA at 312-742-8500 and a representative will connect you to the appropriate staff member to address your concerns.
2		I was issued a 14-day eviction notice on 4.12.18 because it stated that I owed \$629.00, which I was not aware of because my rent for April was paid on 4.2.18. An appointment had been made on the day I received the notice. I was told to come back later to see the new manager, XXXX, they manage the building at XXX. When I returned at 4:00p, Mr. X told me that as of January 1, 2018, my rent in the computer was for \$555.00 instead of \$458.00 that was on my lease. I was not aware of this either, no one had told me of a change in the rent. The lease I signed in January with Ms. X should have had the new amount on it. Could you please help me find out what my rent amount is, and let me know why I owe \$629.00, and why I received an eviction notice for something I was not aware of. Also, can you find out why there is so much confusion with the subleases. Please let me know before rent is due again. As of December 19, 2017, I became head of household because my mother X died July 23, 2017, in the hospital.	CHA staff will reach out to you directly to address your concern.
3	Lorraine Mitchell Sr., 4161 S Drexel, #607, 312.623.5220, lmitchsr@yahoo.com	I need information on the Wait List for HCV as well as information on senior housing.	CHA's senior housing waitlist is currently open. Individuals may apply for housing online at <a href="http://www.thecha.org">www.thecha.org</a> . CHA intends to open site-based waitlists for non-elderly housing by Q3/Q4 2018.

4	Lorraine Loretta Mitchell Jr., 4161 S Drexel, #603, 312.772.1897	I am requesting information on when the HCV, Public Housing & Scattered Sites Wait Lists will open, and if I can gain entry onto any of the Wait Lists.	CHA's senior housing waitlist is currently open. Individuals may apply for housing online at <a href="http://www.thecha.org">www.thecha.org</a> . CHA intends to open site-based waitlists for non-elderly housing by Q3/Q4 2018.
5	Julie Brown < <a href="mailto:jbrown@bpichicago.org">jbrown@bpichicago.org</a> >, BPI	CHA proposes to amend its FY2018 Annual Plan with a number of amendments to the "Planned Disposition Activity." With so little detail given in the "Description" column, and with no other explanation for the reasons behind the proposed dispositions, it is hard to make specific comments. Depending on the eventual uses for certain properties, there may be restrictions imposed by Gautreaux v. CHA. For example, if CHA's plan for disposition of land at the former Rockwell Gardens site includes public housing development, that use would be subject to such restrictions.	Thank you for your input. As required, CHA has included the proposed disposition activity in the annual plan amendment, which will be submitted to HUD for approval. In addition, CHA must obtain HUD approval through the standard disposition application process in order to proceed with any of the proposed disposition activity. CHA will comply with all applicable regulatory requirements prior to submitting any disposition application to HUD.
6	Julie Brown < <a href="mailto:jbrown@bpichicago.org">jbrown@bpichicago.org</a> >, BPI	In addition to potential Gautreaux concerns, much of the land proposed for disposition is located at sites where Working Groups exist to advise CHA on community planning, yet in some cases discussion of the proposed dispositions have not taken place in those Working Groups.	Thank you for your input. As required, CHA has included the proposed disposition activity in the annual plan amendment, which will be submitted to HUD for approval. In addition, CHA must obtain HUD approval through the standard disposition application process in order to proceed with any of the proposed disposition activity. CHA will comply with all applicable regulatory requirements prior to submitting any disposition application to HUD.
7	Julie Brown < <a href="mailto:jbrown@bpichicago.org">jbrown@bpichicago.org</a> >, BPI	On a more specific level, CHA proposes disposing of land at Altgeld Gardens, including (according to the boundaries described in the proposed amendment) land now occupied by a school and public housing. It is unclear from the document whether CHA is contemplating disposing of only the vacant land, or of all of the land, within those boundaries, potentially affecting both the school and the housing.	Thank you for your input. As required, CHA has included the proposed disposition activity in the annual plan amendment, which will be submitted to HUD for approval. In addition, CHA must obtain HUD approval through the standard disposition application process in order to proceed with any of the proposed disposition activity. CHA intends to comply with all applicable regulatory requirements prior to submitting any disposition application to HUD. CHA will obtain land surveys more specifically describing the property as planning continues.
8	Julie Brown < <a href="mailto:jbrown@bpichicago.org">jbrown@bpichicago.org</a> >, BPI	CHA is also proposing to sell vacant land in the Cabrini area, despite its obligation to provide many hundreds more public housing units (1800 in total) in the area. The proposed Amendment offers no explanation for CHA's decision to sell, including any indication of whether the land is suitable for housing production or not.  If CHA truly seeks public input, and is not just "checking a box" required by HUD, it is necessary to provide additional information in the documents presented for public comment.	Thank you for your input. As required, CHA has included the proposed disposition activity in the annual plan amendment, which will be submitted to HUD for approval. In addition, CHA must obtain HUD approval through the standard disposition application process in order to proceed with any of the proposed disposition activity. CHA will comply with all applicable regulatory requirements prior to submitting any disposition application to HUD.
9	Francine Washington	There's -- market value -- talking about selling for Rockwell -- for Washington scattered sites, they're selling for market value, but there was three -- supplement fee. I don't understand what fee supplement.	There are two different ways to dispose of land. CHA can lease it or sell it. Fee simple means the entire land, all of the value of it, goes to the buyer. And I think you asked if we are talking about market value. If we're actually selling it, it is for market value.
10	Francine Washington	Okay. I thought somebody put in for some of this land on Calumet.	Ann McKenzie: They have. There have been offers to purchase CHA land. CHA

Section VI: Administrative

			<p>needs to list properties in the plan to comply with HUD requirements.</p> <p>CHA will comply with all applicable regulatory requirements prior to submitting any disposition application to HUD.</p>
--	--	--	---

***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*

## 2017 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

Whereas, (Public Housing Authority) Chicago Housing Authority IL002 (herein called the "PHA")  
and the United States of America, Secretary of Housing and Urban Development (herein called "HUD") entered into Consolidated Annual Contributions  
Contract(s) ACC(s) Number(s) C-1014 dated 12/11/1995

Whereas, HUD has agreed to provide CFP assistance, upon execution 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 at existing public housing projects in order to ensure that such projects continue to be available to serve low-income families. HUD reserves the right to provide additional CFP assistance in this FY to the PHA. HUD will provide a revised ACC Amendment authorizing such additional amounts.

\$ \$3,541,602.00 for Fiscal Year 2017 to be referred to under Capital Fund Grant Number IL01R00250217  
PHA Tax Identification Number (TIN): On File DUNS Number: On File

Whereas, HUD and the PHA are entering into the CFP Amendment Number \_\_\_\_\_

Now Therefore, the ACC(s) is (are) amended as follows:

1. The ACC(s) is (are) amended to provide CFP assistance in the amount specified above for development, capital and management activities of PHA projects. This CFP Amendment is a part of the ACC(s).
2. The PHA must carry out all development, capital and management activities in accordance with the United States Housing Act of 1937 (the Act), 24 CFR Part 905 (the Capital Fund Final rule) published at 78 Fed. Reg. 63748 (October 24, 2013), as well as other applicable HUD requirements, except that the limitation in section 9(g)(1) of the Act is increased such that of the amount of CFP assistance provided for under this CFP amendment only, the PHA may use no more than 25 percent for activities that are eligible under section 9(e) of the Act only if the PHA's HUD-approved Five Year Action Plan provides for such use; however, if the PHA owns or operates less than 250 public housing dwelling units, such PHA may continue to use the full flexibility in section 9(g)(2) of the Act.
3. The PHA has a HUD-approved Capital Fund Five Year Action Plan and has complied with the requirements for reporting on open grants through the Performance and Evaluation Report. The PHA must comply with 24 CFR 905.300 of the Capital Fund Final rule regarding amendment of the Five Year Action Plan where the PHA proposes a Significant Amendment to the Capital Fund Five Year Action Plan.
4. For cases where HUD has approved a Capital Fund Financing Amendment to the ACC, HUD will deduct the payment for amortization scheduled payments from the grant immediately on the effective date of this CFP Amendment. The payment of CFP funds due per the amortization scheduled will be made directly to a designated trustee within 3 days of the due date.
5. Unless otherwise provided, the 24 month time period in which the PHA must obligate this CFP assistance pursuant to section 9(g)(1) of the Act and 48 month time period in which the PHA must expend this CFP assistance pursuant to section 9(g)(5) of the Act starts with the effective date of this CFP amendment (the date on which CFP assistance becomes available to the PHA for obligation). Any additional CFP assistance this FY will start with the same effective date.
6. Subject to the provisions of the ACC(s) and paragraph 3, and to assist in development, capital and management activities, HUD agrees to disburse to the PHA or the designated trustee from time to time as needed up to the amount of the funding assistance specified herein.
7. The PHA shall continue to operate each public housing project as low-income housing in compliance with the ACC(s), as amended, the Act and all HUD regulations for a period of twenty years after the last disbursement of CFP assistance for modernization activities for each public housing project or portion thereof and for a period of forty years after the last distribution of CFP assistance for development activities for each public housing project and for a period of ten years following the last payment of assistance from the Operating Fund to each public housing project. However, the provisions of Section 7 of the ACC shall remain in effect for 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 ACC(s) and which is not eligible for forgiveness, and provided further that, no disposition of any project covered by this amendment shall occur unless approved by HUD.
8. The PHA will accept all CFP assistance provided for this FY. If the PHA does not comply with any of its obligations under this CFP Amendment and does not have its Annual PHA Plan approved within the period specified by HUD, HUD shall impose such penalties or take such remedial action as provided by law. HUD may direct the PHA to terminate all work described in the Capital Fund Annual Statement of the Annual PHA Plan. In such case, the PHA shall only incur additional costs with HUD approval.
9. Implementation or use of funding assistance provided under this CFP Amendment is subject to the attached corrective action order(s).  
(mark one): ☐ Yes ☒ No
10. The PHA is required to report in the format and frequency established by HUD on all open Capital Fund grants awarded, including information on the installation of energy conservation measures.
11. If CFP assistance is provided for activities authorized pursuant to agreements between HUD and the PHA under the Rental Assistance Demonstration Program, the PHA shall follow such applicable statutory authorities and all applicable HUD regulations and requirements. For total conversion of public housing projects, the provisions of Section 7 of the ACC shall remain in effect for 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 ACC(s) and which is not eligible for forgiveness, 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 partial conversion, the PHA shall continue to operate each non-converted public housing project as low-income housing in accordance with paragraph 7.
12. CFP assistance provided as an Emergency grant or a Safety and Security grant shall be subject to a 12 month obligation and 24 month expenditure time period. CFP assistance provided as a Natural Disaster grant shall be subject to a 24 month obligation and 48 month expenditure time period. The start date shall be the date on which such funding becomes available to the PHA for obligation. The PHA must record the Declaration(s) of Trust within 60 days of the effective date or HUD will recapture the funds.

The parties have executed this CFP Amendment, and it will be effective on 8/18/2017. This is the date on which CFP assistance becomes available to the PHA for obligation.

U.S. Department of Housing and Urban Development By _____ Date: _____	PHA (Executive Director or authorized agent) By _____ Date: <u>7/20/17</u>
Title _____	Title _____

Previous versions obsolete

form HUD-52840-A OMB Approval No. 2577-0157 (exp. 03/31/2020)

**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>Grant Type and Number</b>		<b>FFY of Grant 2018</b>	
<b>PHA Name: CHICAGO HOUSING AUTHORITY</b>		<b>Capital Fund Program Grant No:</b>		<b>FFY of Grant Approval: 2017</b>	
<b>Replacement Housing Factor Grant No: IL01R00250217</b>		<b>Date of CFFP: 8/16/2017</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"/> Summary by Development Account					
<input type="checkbox"/> Reserve for Disasters/Emergencies					
<input type="checkbox"/> Revised Annual Statement (revision not)					
<input type="checkbox"/> Final Performance and Evaluation Report					
<b>Line</b>	<b>Description</b>	<b>Original</b>	<b>Revised<sup>1</sup></b>	<b>Obligated</b>	<b>Total Actual Cost<sup>1</sup></b>
1	Total non-CFF Funds				Expended
2	1406 Operations (may not exceed 20% of line 21) <sup>3</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	\$3,541,602			
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> RHP funds shall be included here.



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>		<b>FFY of Grant: 2018</b>	
<b>PHA Name:</b> CHICAGO HOUSING AUTHORITY	<b>Grant Type and Number</b> Capital Fund Program Grant No: Replacement Housing Factor Grant No: IL01R00250217 Date of CFFP: 8/16/2017	<b>FFY of Grant Approval: 2017</b>	
<input checked="" type="checkbox"/> <b>Original Annual Statement</b> <input type="checkbox"/> <b>Performance and Evaluation Report for Period Ending:</b>		<input type="checkbox"/> <b>Revised Annual Statement (revision no: )</b> <input type="checkbox"/> <b>Final Performance and Evaluation Report</b>	
<b>Type of Grant</b>		<b>Total Estimated Cost</b>	
<input checked="" type="checkbox"/> <b>Original Annual Statement</b>		<b>Original</b>	
<input type="checkbox"/> <b>Performance and Evaluation Report for Period Ending:</b>		<b>Revised</b>	
<b>Summary by Development Account</b>		<b>Total Actual Cost<sup>1</sup></b>	
<b>Line</b>		<b>Obligated</b>	<b>Expended</b>
18a	1501 Collateralization or Debt Service paid by the PHA		
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)		
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		
<b>Signature of Executive Director</b>		<b>Signature of Public Housing Director</b>	
<b>Date</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 CFFP Grants for operations.

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



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

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

[illegible]

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



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

[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.

## 2017 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

Whereas, (Public Housing Authority) Chicago Housing Authority IL002 (herein called the "PHA")  
and the United States of America, Secretary of Housing and Urban Development (herein called "HUD") entered into Consolidated Annual Contributions  
Contract(s) ACC(s) Number(s) C-1014 dated 12/11/1995

Whereas, HUD has agreed to provide CFP assistance, upon execution 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 at existing public housing projects in order to ensure that such projects continue to be available to serve low-income families. HUD reserves the right to provide additional CFP assistance in this FY to the PHA. HUD will provide a revised ACC Amendment authorizing such additional amounts.

\$ \$51,199,095.00 for Fiscal Year 2017 to be referred to under Capital Fund Grant Number IL01P00260117  
PHA Tax Identification Number (TIN): On File DUNS Number: On File

Whereas, HUD and the PHA are entering into the CFP Amendment Number \_\_\_\_\_

Now Therefore, the ACC(s) is (are) amended as follows:

- The ACC(s) is (are) amended to provide CFP assistance in the amount specified above for development, capital and management activities of PHA projects. This CFP Amendment is a part of the ACC(s).
- The PHA must carry out all development, capital and management activities in accordance with the United States Housing Act of 1937 (the Act), 24 CFR Part 905 (the Capital Fund Final rule) published at 78 Fed. Reg. 63748 (October 24, 2013), as well as other applicable HUD requirements, except that the limitation in section 9(g)(1) of the Act is increased such that of the amount of CFP assistance provided for under this CFP amendment only, the PHA may use no more than 25 percent for activities that are eligible under section 9(e) of the Act only if the PHA's HUD-approved Five Year Action Plan provides for such use; however, if the PHA owns or operates less than 250 public housing dwelling units, such PHA may continue to use the full flexibility in section 9(g)(2) of the Act.
- The PHA has a HUD-approved Capital Fund Five Year Action Plan and has complied with the requirements for reporting on open grants through the Performance and Evaluation Report. The PHA must comply with 24 CFR 905.300 of the Capital Fund Final rule regarding amendment of the Five Year Action Plan where the PHA proposes a Significant Amendment to the Capital Fund Five Year Action Plan.
- For cases where HUD has approved a Capital Fund Financing Amendment to the ACC, HUD will deduct the payment for amortization scheduled payments from the grant immediately on the effective date of this CFP Amendment. The payment of CFP funds due per the amortization scheduled will be made directly to a designated trustee within 3 days of the due date.
- Unless otherwise provided, the 24 month time period in which the PHA must obligate this CFP assistance pursuant to section 9(g)(1) of the Act and 48 month time period in which the PHA must expend this CFP assistance pursuant to section 9(g)(5) of the Act starts with the effective date of this CFP amendment (the date on which CFP assistance becomes available to the PHA for obligation). Any additional CFP assistance this FY will start with the same effective date.
- Subject to the provisions of the ACC(s) and paragraph 3, and to assist in development, capital and management activities, HUD agrees to disburse to the PHA or the designated trustee from time to time as needed up to the amount of the funding assistance specified herein.
- The PHA shall continue to operate each public housing project as low-income housing in compliance with the ACC(s), as amended, the Act and all HUD regulations for a period of twenty years after the last disbursement of CFP assistance for modernization activities for each public housing project or portion thereof and for a period of forty years after the last distribution of CFP assistance for development activities for each public housing project and for a period of ten years following the last payment of assistance from the Operating Fund to each public housing project. However, the provisions of Section 7 of the ACC shall remain in effect for 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 ACC(s) and which is not eligible for forgiveness, and provided further that, no disposition of any project covered by this amendment shall occur unless approved by HUD.
- The PHA will accept all CFP assistance provided for this FY. If the PHA does not comply with any of its obligations under this CFP Amendment and does not have its Annual PHA Plan approved within the period specified by HUD, HUD shall impose such penalties or take such remedial action as provided by law. HUD may direct the PHA to terminate all work described in the Capital Fund Annual Statement of the Annual PHA Plan. In such case, the PHA shall only incur additional costs with HUD approval.
- Implementation or use of funding assistance provided under this CFP Amendment is subject to the attached corrective action order(s).  
(mark one): ☐ Yes ☒ No
- The PHA is required to report in the format and frequency established by HUD on all open Capital Fund grants awarded, including information on the installation of energy conservation measures.
- If CFP assistance is provided for activities authorized pursuant to agreements between HUD and the PHA under the Rental Assistance Demonstration Program, the PHA shall follow such applicable statutory authorities and all applicable HUD regulations and requirements.  
For total conversion of public housing projects, the provisions of Section 7 of the ACC shall remain in effect for 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 ACC(s) and which is not eligible for forgiveness, 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 partial conversion, the PHA shall continue to operate each non-converted public housing project as low-income housing in accordance with paragraph 7.
- CFP assistance provided as an Emergency grant or a Safety and Security grant shall be subject to a 12 month obligation and 24 month expenditure time period. CFP assistance provided as a Natural Disaster grant shall be subject to a 24 month obligation and 48 month expenditure time period. The start date shall be the date on which such funding becomes available to the PHA for obligation. The PHA must record the Declaration(s) of Trust within 80 days of the effective date or HUD will recapture the funds.

The parties have executed this CFP Amendment, and it will be effective on 8/16/2017. This is the date on which CFP assistance becomes available to the PHA for obligation.

U.S. Department of Housing and Urban Development By _____ Date: _____	PHA (Executive Director or authorized agent) By _____ Date: <u>7/20/17</u>
Title _____	Title _____

Previous versions obsolete

form HUD-52840-A OMB Approval No. 2577-0157 (exp. 03/31/2020)



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>PHA Name: CHICAGO HOUSING AUTHORITY</b>		<b>Grant Type and Number</b> Capital Fund Program Grant No: IL01P00250117 Replacement Housing Factor Grant No: Date of CFFP: 8/16/2017		<b>FFY of Grant: 2018</b> <b>FFY of Grant Approval: 2017</b>	
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:				<input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report			
<b>Summary by Development Account</b>				<b>Total Estimated Cost</b>		<b>Total Actual Cost<sup>1</sup></b>	
<b>Line</b>	<b>Type of Grant</b>	<b>Reserve for Disasters/Emergencies</b>	<b>Original</b>	<b>Revised<sup>2</sup></b>	<b>Obligated</b>	<b>Expended</b>	
1	Total non-CFFP Funds						
2	1406 Operations (may not exceed 20% of line 21) <sup>3</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		\$51,198,095				
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> RHF funds shall be included here.

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>		<b>FFY of Grant: 2018</b> <b>FFY of Grant Approval: 2017</b>	
<b>PHA Name:</b> CHICAGO HOUSING AUTHORITY	<b>Grant Type and Number</b> Capital Fund Program Grant No: IL01P00250117 Replacement Housing Factor Grant No: Date of CFFP: 8/16/2017		
<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"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report	
<b>Line</b>	<b>Summary by Development Account</b>	<b>Total Estimated Cost</b>	<b>Total Actual Cost<sup>1</sup></b>
		<b>Original</b>	<b>Obligated</b>
18a	1501 Collateralization or Debt Service paid by the PHA		
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$51,198,095	
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		
<b>Signature of Executive Director</b>		<b>Signature of Public Housing Director</b>	
<b>Date</b> 7/26/17		<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 CFFP Grants for operations.

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

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

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

[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.



**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

[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.



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**

[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.





# 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

CHA Proposed Amended FY2018 MTW Annual Plan – Submitted to HUD on May 23, 2018

- 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:

<b>Program Direct Costs</b>	
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

<b>Program COCC Indirect Costs</b>	
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***

The CHA incorporates 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, CHA provides 5.3% and 2.1% respectively.

The CHA contracts with a third party architecture firm to certify all UFAS Mobility and Sensory units. The third party has certified that over 1,400 mobility units in the CHA portfolios meet the exacting standards of UFAS 504. Maintaining the certification process with a third party, which has been accepted and approved by HUD, provides the CHA with 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 within the Office of the General Counsel dedicated to addressing issues of fair housing and disability in subsidized housing. The Housing Rights and Nondiscrimination Department (HRND) is responsible for compliance with all applicable fair housing and disability-related regulations. HRND monitors and addresses 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 428 decisions on reasonable accommodation requests submitted by CHA public housing residents and 1,728 decisions on reasonable accommodation requests submitted by CHA HCV participants.

HRND organizes and facilitates Authority-wide trainings on 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 regarding policies and procedures relative to fair housing and disability. HRND tailors trainings to the specific audience on 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 2017. Trainings will be a combination of on-site presentations and webinars and 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 April, MOPD has provided structural modifications to several HCV participants, including the installation of an outside lift and bathroom retrofits. 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. CHA refers participants to MOPD for an assessment and after it is determined that the modifications can be completed, 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.

As part of an MTW demonstration program, CHA issues tenant-based vouchers to expand affordable housing choices within housing Mobility 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. For FY2018, CHA has proposed increasing the exception payment standard to 250% for reasonable accommodations. This program gives HCV participants access to amenities in designated economic Mobility Areas, such as better education and 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 250% 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 3rd quarter of 2017. 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.

The CHA also participates in a Fair Housing Task force that is organized by the Chicago Area Fair Housing Alliance (CAFHA). The task force specifically address fair housing issues related to CHA HCV participants. The CHA participates on the accessibility committee and provides training and information on CHA programs so that outside agencies better understand the voucher program and the obstacles participants face when searching for housing in the private market. One project initiated by the taskforce was a study of accessible units listed on an apartment search site and the cost of structurally accessible units versus standard units without accessibility features. The study addressed the impediments to accessible housing for participants with disabilities and has helped shape CHA policy on accessing accessible units.

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 signed on to participate in a regional Assessment of Fair Housing (AFH) with the City of Chicago, The Housing Authority of Cook County and Cook County. The Chicago Metropolitan Agency for Planning (CMAP) will be overseeing the collaboration between the participating agencies and jurisdictions. In July 2017, CMAP submitted a notification

letter to HUD regarding the proposed regional collaboration and is developing a more formal agreement to this effect among the jurisdictions and agencies, as called for in 24 CFR § 5.156(a)(3). The agreement will specify Cook County as the lead entity to oversee the submission of the AFH on behalf of all collaborating program participants. The start of the next program year for which Cook County must submit a new five-year consolidated plan is October 1, 2020. Therefore, because Cook County is serving as the lead entity, the regional AFH will be due to HUD on January 5, 2020.

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

The Chicago Housing Authority (CHA) is amending the FY2017 Moving to Work Annual Plan to reflect adjustments to the public housing developments anticipated for the Rental Assistance Demonstration (RAD) Program. CHA previously amended the FY2014 and FY2015 MTW Annual Plans with required RAD elements. This FY2016 MTW Annual Plan Amendment includes the same content except for relevant updates since the approved FY2014 and FY2015 MTW Annual Plan Amendments.

Through RAD, CHA is converting select properties to Project-Based Vouchers (PBV) under the guidelines of PIH Notice 2012-32, REV-2 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, REV-2 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.

NAME AND STATUS	PIC AMP	RAD Type	Total Units	Unit Mix (Pre-Conversion / Post-Conversion)	Property Type	Section VI: Transfer of Assistance Proposed	Administrative Capital Fund Allocation
Fannie Emanuel (Parkview) – converted 2016	IL002065000	PBV	181	1BR - 181	Senior	No	\$24,000,000
Daniel Burnham Apts – converted 2016	IL002075000	PBV	181	1BR - 181	Traditional Senior	No	\$7,400,000
Schneider – converted 2017	IL002059000	PBV	174	1BR - 174	Traditional Senior	No	\$5,222,933
Las Americas – converted 2017	IL002063000	PBV	212	1BR - 211 2BR - 1	Traditional Senior	No	\$7,110,040
Lorraine Hansberry – converted 2017	IL002064000	PBV	169	1 BR - 169	Traditional Senior	No	\$8,900,000
Mary Hartwell Catherwood	IL002055000	PBV	357	0BR - 11 1BR - 343 2BR - 3	Traditional Senior	No	TBD
Margaret Day Blake (incl. Maria Diaz Martinez and Elizabeth Woods)	IL002072000	PBV	317	1BR - 313 2BR - 4	Traditional Senior	No	TBD
Zelda Ormes	IL002049000	PBV	269	0BR - 82 1BR - 186 2BR - 1	Traditional Senior	No	\$8,408,400
Kenneth Campbell	IL002082000	PBV	165	0BR - 24 1BR - 140 2BR - 1	Traditional Senior	No	\$5,100,000
Mahalia Jackson	IL002041000	PBV	282	1BR - 280 2BR - 2	Traditional Senior	No	TBD
Hilliard 1 Senior	IL002135000	PBV	94	1BR - 94	Mixed-Income	No	\$900,000
Hilliard 2 Senior	IL002100000	PBV	94	1BR - 94	Mixed-Income	No	\$900,000
Caroline Hedger – converted 2016	IL002076000	PBV	450	0BR - 303 1BR - 145 2BR - 2	Traditional Senior	No	\$1,200,000
Minnie Riperton – converted 2016	IL002078000	PBV	339	0BR - 13 1BR - 325 2BR - 1	Traditional Senior	No	\$4,0500,000

## Section VI: Administrative

<b>Robert Lawrence – converted 2017</b>	IL002086000	PBV	193	1BR – 192 2BR – 1	Traditional Senior	No	\$8,996,010
<b>Ada S. Dennison McKinley</b>	IL002081000	PBV	125	1BR – 124 2 BR – 1	Traditional Senior	No	TBD
<b>Ella Flagg Young (incl. Castleman)</b>	IL002060000	PBV	436	0BR – 40 1BR – 396	Traditional Senior	No	TBD
<b>William Jones</b>	IL002070000	PBV	116	1BR – 115 2BR – 1	Traditional Senior	No	TBD
<b>Irene McCoy Gaines</b>	IL002062000	PBV	151	0BR – 32 1BR – 118 2BR – 1	Traditional Senior	No	TBD
<b>Alfreda Barnett Duster</b>	IL002042000	PBV	129	0BR – 26 1BR – 102 2BR – 1	Traditional Senior	No	TBD
<b>Elizabeth Davis</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	0BR – 46 1BR – 346 2BR – 2	Traditional Senior	No	TBD
<b>Flannery</b>	IL002044000	PBV	252	0BR – 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	\$6,200,000
<b>Mary Jane Richardson (incl. Maudelle Brown Bousfield)</b>	IL002079000	PBV	266	0BR – 87 1BR – 177 2BR – 2	Traditional Senior	No	TBD
<b>Vivian Gordon Harsh (incl. Judge Green)</b>	IL002083000	PBV	278	0BR – 21 1BR – 255 2BR – 2	Traditional Senior	No	TBD
<b>Judge Fisher – converted 2017</b>	IL002057000	PBV	199	0BR – 40 1BR – 159	Traditional Senior	No	\$11,008,000
<b>Lidia Pucinska</b>	IL002043000	PBV	378	1BR – 376 2BR – 2	Traditional Senior	No	TBD



Patrick Sullivan	IL002067000	PBV	482	0BR – 240 1BR – 240 2BR – 2	Traditional Senior	No	\$10,980,000
Armour Square	IL002046000	PBV	392	0BR – 43 1BR – 345 2BR – 4	Traditional Senior	No	TBD
Lincoln Perry – converted 2016	IL002052100	PBV	450	0BR – 8 1BR 440 2BR – 2	Traditional Senior	No	\$7,650,000
Judge Slater – converted 2016	IL002084000	PBV	407	0BR – 13 1BR – 393 2BR - 1	Traditional Senior	No	\$7,250,000
Vivian Carter	IL002080000	PBV	224	1BR – 223 2BR – 1	Traditional Senior	No	\$6,800,000
Hattie Callner	IL002048000	PBV	147	0BR – 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* Phase 1A converted 2017	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	–	PBV	33	0BR – 3 1BR – 9 2BR – 21	Family	Yes – Proposed Transfer from Lathrop Homes	TBD
6438 N. Sheridan (The Concord)	IL002022000 MP1	PBV	65	1BR – 47 2BR – 18	Family	Yes – Proposed Transfer	\$20,000,000

						from Lathrop Homes	
<b>4501 N. Winchester</b>	IL002022000 MP2	PBV	74	1BR – 74	Senior	Yes – Proposed Transfer from Lathrop Homes	TBD
<b>2031 – 37 N. Milwaukee</b>	IL002022000 MP4	PBV	47	1BR – 35 2BR – 12	Family	Yes – Proposed Transfer from Lathrop Homes	TBD
<b>5525 W. Diversey</b>	IL002022000 MP3	PBV	45	1BR – 45	Family	Yes – Proposed Transfer from Lathrop Homes	TBD
<b>4022 N. Elston</b>	IL002022000 MP5	PBV	30	1 BR – 30	Senior	Yes – Proposed Transfer from Lathrop Homes	TBD
<b>6800 N. Western</b>	IL002022000 MP6	PBV	30	1 BR – 30	Senior	Yes – Proposed Transfer from Lathrop Homes	TBD
<b>Altgeld Gardens*</b>	IL002002000 B	PBV	0	0BR – 2/0BR – 0 1BR – 12/1BR – 0 2BR – 104/2BR – 0 3BR – 102/3BR – 0 4BR – 24/4BR – 0	Family	Yes – multiple locations TBD	---
<b>Ickes Phase 1A and 1B</b>	--	PBV	Apx. 94	TBD	Family	Yes – Proposed Transfer from Altgeld Gardens	TBD
<b>Langston</b>	IL002021000	PBV	29	1BR – 9 2BR – 11 3BR – 4 4BR – 5	Mixed-Income	No	TBD
<b>Quincy</b>	IL002020000	PBV	27	1BR – 5 2BR – 14 3BR – 7	Mixed-Income	No	TBD

				4BR – 1			
Other	---	PBV	447	TBD	TBD	TBD	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
- CHA Proposed Amended FY2018 MTW Annual Plan – Submitted to HUD on May 23, 2018

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.

Under the Housing Choice Voucher program, the EID exclusion is limited to only persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) 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.

As outlined in this amendment, CHA is currently pursuing MTW authorization to retain the public housing policy for Earned Income Disregard (EID) in sites converting to RAD. Upon HUD approval, CHA will update the EID policy for RAD sites.

- 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) wait list and site-based senior housing wait list (as applicable) for RAD properties. For RAD properties where transfer of assistance will be utilized, CHA will notify existing wait list applicants how they can apply for any new properties with site-based wait lists. All newly established site-based wait lists 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. 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*



**OFFICE OF THE MAYOR  
CITY OF CHICAGO**

**RAHM EMANUEL  
MAYOR**

**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.

A handwritten signature in blue ink that reads "Rahm Emanuel".

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 Rios

Title

Chief Administrative Officer

Signature

X *Patricia Rios*

Date

9/7/17

form HUD-50070 (3/98)

ref. Handbooks 7417.1, 7475.13, 7485.1 & .3



**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
  
- 5. Section 3 Field Office**  
3641 S. State Street  
Chicago, IL 60609



**CHA**

CHICAGO HOUSING  
AUTHORITY™

# EMPLOYEE HANDBOOK



#### **Reporting Absences**

It is the responsibility of each employee to secure advance approval from his or her immediate supervisor for all anticipated absences, such as vacation or personal days.

For absences of three (3) or more consecutive scheduled workdays, you may be required to provide a written doctor's statement to your supervisor. **If an employee is absent from work for three (3) or more consecutive schedule workdays without calling in it will be assumed that the employee has voluntarily terminated his or her employment.** Additionally, unless you are on an authorized leave of absence, you must maintain contact with your supervisor throughout any absence extending beyond one day, notifying him/her daily whether and when you will be returning to work, unless other arrangements have been made with the immediate supervisor. Failure to notify your supervisor personally or a designee may result in disciplinary action up to and including termination.

#### **Excessive Absenteeism and/or Tardiness**

Excessive absenteeism or tardiness and patterns of sick or unpaid time before or after holidays, weekends or authorized leaves are unacceptable and will result in disciplinary action up to and including termination of employment.

#### **4.4 Smoking**

To comply with the 2005 Chicago Clean Indoor Air Ordinance and in order to provide employees and residents with a healthy environment, smoking and the use of electronic cigarettes is prohibited in all CHA buildings and facilities. Smoking is permitted outdoors at least 15 feet away from the entrance or enclosed area of any building.

#### **4.5 Substance Abuse**

The CHA is committed to a community that is free of illegal drug use and alcohol abuse. The Authority strictly prohibits the unlawful possession, use or distribution of illicit drugs or alcohol at any of its properties. Any employee found to possess, use or distribute alcohol or controlled substances on CHA property, or at a CHA activity, in violation of law or CHA policy is subject to disciplinary action, including termination, as well as possible referral for criminal prosecution.

Employees who take prescribed drugs that affect their cognitive abilities should not report to work and should use appropriate leaves.

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

1. Upon the CHA 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.

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 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. Employees are required to come to work in a mental and physical condition that will allow them to perform their 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.

#### **4.6 Workplace Safety**

In compliance with the Occupational Safety and Health Act (OSHA), the Authority strives to furnish a workplace free of recognized hazards that would cause physical harm to its employees. Employees must immediately report all unsafe or unhealthy working conditions or alleged work related accidents to their supervisor or Department Director. Employees seeking further information about safety or emergency procedures should contact the Risk Management Department.

#### **4.7 Workplace Violence**

CHA recognizes the unfortunate increase in workplace violence in our society and has a strong commitment to ensuring that our workplace remains safe. The possession or use of dangerous weapons is prohibited on CHA property or anywhere the CHA conducts business, unless authorized by the agency to do so.

To help employees understand and report behavior that could lead to violent incidents, we have included this list of prohibited conduct. This list of behaviors should not be considered all-inclusive, but merely a list of examples to be considered. These and other violent actions may result in disciplinary action, up to and including termination:

- Intentionally causing physical injury to another person



CHICAGO HOUSING  
AUTHORITY™

60 E. Van Buren, Chicago, IL 60605, 312.742.8500

**RAHM EMANUEL**  
MAYOR, CITY OF CHICAGO

**EUGENE JONES JR**  
CEO, CHICAGO HOUSING AUTHORITY

**JOHN T. HOOKER**  
CHAIRPERSON

**CRAIG CHICO**  
VICE-CHAIRMAN

**MATTHEW BREWER**  
**MARK COZZI**  
**DR. MILDRED HARRIS**  
**MEGHAN HARTE**  
**JOHN MARKOWSKI**  
**CRISTINA MATOS**  
**FRANCINE WASHINGTON**  
BOARD OF COMMISSIONERS