



# Proposed FY2016 Moving to Work Annual Plan



**CHA**

CHICAGO HOUSING  
AUTHORITY

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## Message from Acting CEO

My name is Eugene Jones, Jr., and I am proud to serve as Acting CEO of the Chicago Housing Authority. As I take the reins of the third-largest housing authority in the nation, my key focus is on increasing the quality of life for CHA residents and leveraging opportunities for those on a pathway toward self-sufficiency. I am equally committed to building strong, vibrant communities throughout Chicago. Throughout my 30-plus years in the public housing arena, this dual foundation is a critical ingredient that will help lead to multiple employment and educational possibilities for low-income families. And as we head toward the future, this agency's vital initiatives will mirror the three goals of the Moving To Work (MTW) agreement:

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

It is with that spirit that I present to you the CHA's FY2016 MTW Annual Plan.

This document lays out the ongoing activities authorized by the U.S. Department of Housing and Urban Development (HUD) through the Amended and Restated MTW Agreement, as well as proposed actions that require HUD approval. Collectively, these activities work toward the three MTW goals, and we have set a deliberate and expeditious pace to meet our development objectives.

Since my appointment as Acting CEO in June 2015, CHA has built an unmistakable momentum. Among the highlights:

- Work on Altgeld Gardens, one of the oldest and most historic of CHA's developments, commenced in summer 2015. It includes a \$53.2 million construction project on Blocks 7 and 8. Work will consist of a complete gut rehab of 218 units in 25 existing buildings, civil improvements and landscaping. CHA also received Board approval in August to amend its FY2015 annual plan for the demolition of Block 15 (15 buildings, 120 units) and Block 16 (10 buildings, 62 units). Demolition is projected to begin in the second quarter of 2016. And the new Gautreaux Child Development Center, a new space expected to be adjacent to the new library, is currently in architectural design.
- Construction on City Gardens, a \$28 million single-phase, mixed-income rental development project that will be built on vacant land formerly known as Maplewood Courts, has also begun. The development will consist of 76 units comprised of 25 public housing units, 30 affordable and 21 market rate units. City Gardens, a city/state parcel located within the Rockwell Gardens area, is projected to be completed in December, 2016.
- St. Edmund's Oasis, a \$20 million single-phase, mixed-income rental development in the Washington Park community is projected to close in November, 2015. This new family rental development will provide 58 total units, including 19 for public housing and 39 for affordable housing residents.
- Sterling Park Apartments is an adaptive re-use of a vacant, historic industrial office and research facility formerly owned by Sears and Roebuck in the Homan Square community located on the West Side of Chicago. Sterling is a single phase, 181 unit affordable apartment development that will provide 66 public housing and 115 affordable units. Development is expected to be completed in December, 2016.
- And finally, Fannie Emanuel – a CHA-owned, senior high-rise building located in West Garfield Park - is the agency's first CHA RAD transaction. It is scheduled to close in fourth quarter of 2015, with 181 units to be delivered in first quarter 2017. It is a 20-story high masonry building built in 1963 with 181 one-bedroom units. Due to significant mechanical system problems, the building was closed in 2007. CHA, as developer, will redevelop this property using mixed-financing to leverage HUD RAD funds with private equity. It will return 181 housing units to CHA's leasing portfolio.

CHA also has more than 10 deals in the pipeline slated for closing over the next two years. It is a fast pace that I intend to keep.

Of course, the work of the agency could not have been accomplished without key partnerships, including foundations and civic organizations, businesses, financial institutions, community organizations and government agencies including HUD. CHA will continue to foster these productive relationships as we move forward building strong, vibrant communities throughout Chicago. The agency is grateful for the strong leadership of Chicago's mayor, the Honorable Rahm Emanuel, whose support and guidance are essential in creating sustainable, healthy communities.

I would also like to acknowledge John Hooker as the new Chairman of the Board of Commissioners, and I look forward to the good work ahead for the upcoming fiscal year through the activities articulated in the FY2016 MTW Annual Plan.

Thank you for your time and interest as the agency helps to strengthen the diverse array of Chicago communities and families.

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

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# Section One

## Introduction

## Section I: Introduction

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

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

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

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

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

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

### Key Plan Forward Initiatives

Throughout FY2016, CHA will continue to pursue and/or plan for future implementation of the following Plan Forward initiatives.

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

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

- Mixed-Income Redevelopment: CHA will continue with new on- and off-site phases in mixed-income developments which have replaced many former CHA properties.
- Real Estate Acquisition Program (REAP): CHA launched a new strategy for acquisition of public housing units, primarily in opportunity areas. In addition, CHA released a Request for Qualifications (RFQ) to solicit a pool of developers interested in partnering with CHA.

- **Property Rental Assistance (PRA) Program:** CHA will continue to expand the existing PRA program to provide new project-based voucher units through multi-year contracts with private owners and developers.
- **Preservation Strategies:** CHA plans 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 would be subject to CHA's standard PRA selection process.
- **Rehabilitation:** CHA plans to rehabilitate a portion of remaining offline units at Altgeld Gardens.
- **Choose To Own Homeownership Program:** CHA facilitates homeownership opportunities for CHA families through long-term subsidy commitments. CHA will request HUD approval to count these units toward the 25,000 goal.
- **Conversion of Moderate Rehabilitation Properties:** CHA is assessing existing privately-owned CHA Moderate Rehabilitation program properties to identify opportunities to transition these properties to the PRA Program through RAD conversion or the standard project-based voucher selection process.
- **Other Initiatives:** CHA continues to explore new unit delivery strategies to respond to local housing preferences and market opportunities.

During FY2016, CHA will continue to make progress toward the 25,000 unit goal of the original Plan. CHA plans to deliver an additional 1,028 in FY2016, for an overall total of 23,902 housing units or 96% of the overall unit delivery goal.<sup>1</sup> (Please refer to Section II and IV for more information.)

**Projected FY2016 Unit Delivery**

IL Number	Type	Development/Program	Projected FY2016 Unit Delivery
IL002165000	Mixed-Income Housing Redevelopment	Casa Queretaro	15
IL002166000		Rosenwald Courts Apartments	60
TBD		St. Edmund's Oasis	19
TBD		City Gardens	25
TBD		Sterling Park Apartments	66
TBD	Public Housing Acquisition	Real Estate Acquisition Program (REAP)	50
IL002002000	Family Housing Rehabilitation	Altgeld Gardens	218
N/A	Property Rental Assistance (PRA) Program	Project-Based Vouchers	450
N/A	Moderate Rehabilitation Conversions	Project-Based Vouchers	125
<b>Total Housing Units</b>			<b>1,028</b>

### **Uniform Housing Policy**

Like most housing authorities, CHA administers two primary housing subsidy programs: the Public Housing and Housing Choice Voucher programs. While the programs are similar in several key aspects, the specific policies have evolved over time and differ in areas that lead to administrative inefficiencies and participant confusion. Another

<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.

element of Plan Forward is to address these issues by creating a Uniform Housing Policy to establish a more consistent set of rules for all CHA-assisted housing. The Uniform Housing Policy will align requirements, standards, and processes for the two housing programs, including establishing consistent policies where possible, to streamline and clarify program administration and to make policies more user-friendly for participants. CHA will implement the Uniform Housing Policy through a multi-phased approach.

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

Implementation of Phase 1 is ongoing throughout FY2015 and will continue in FY2016. CHA continues to plan for Phase 2 of Uniform Housing Policy and will request MTW approval as necessary in FY2016 through a future proposed annual plan amendment.

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

In October 2013, CHA submitted a portfolio application to HUD to utilize RAD for approximately 64 public housing properties with 10,935 units over the next two years (2014-2015). CHA plans to utilize RAD to refinance some properties and to support new initiatives that will expand affordable housing opportunities. More than 40 stakeholder, resident and community meetings were held prior to the application to educate people about the benefits of RAD and how it can be used to support long-term affordability.

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

In June 2015, CHA received a RAD award for its portfolio application. CHA closed its first RAD financial transaction for Fannie Emanuel Senior Apartments in December 2015. In FY2016 and continuing into FY2017, CHA will continue to move forward with RAD implementation for the entire portfolio application.

#### **Proposed MTW Activities in FY2016**

In FY2016, CHA is proposing the following MTW activity.

- ***Mobility Counseling Demonstration Program Work Requirement (2016-02)***: CHA proposes to implement a work requirement for applicants who consent to participation in the Mobility Counseling Demonstration Program and move to either a CHA Opportunity or Gautreaux-designated General Area utilizing a tenant-based Housing Choice Voucher.

- 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 is proposing to update this activity to reflect that existing work requirements in public housing and mixed-income properties transitioning to RAD will carry over for any individual who was previously subject to a work requirement as well as for new applicable residents after RAD conversion.
- Expansion of Public Housing Earned Income Disallowance Policy to CHA PBV Properties within the RAD Program (2016-02): CHA is proposing to retain the EID policy for residents in RAD PBV units, which will allow any eligible resident, including non-disabled persons, to have the opportunity to utilize EID.
- Uniform Physical Conditions Standards (UPCS) Inspection Standards for PBV Properties within the RAD Program (2016-04): CHA is proposing to retain the UPCS inspection criterion because it is considered a more stringent set of standards for inspections when compared to HQS, therefore insuring a better housing product.
- Adjusting Fair Market Rent (FMR) Thresholds to Retain Existing Subsidy Levels for Converting to PBV Properties within the RAD Program (2016-06): CHA is requesting authorization to exceed the Fair Market Rent (FMR) cap of 110% for RAD PBV properties (under current standard Project-Based Voucher rules), as needed to retain the subsidy level CHA currently receives for properties.

### Approved MTW Activities in FY2016

In FY2016, 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.
- Alternate Reasonable Cost Formula for Redevelopment and Rehabilitation (2010-01): CHA has authorization to utilize an alternate reasonable cost formula for both redevelopment and rehabilitation projects.
- Expedited Public Housing Acquisition Process (2015-01): CHA is authorized to use MTW flexibility to support CHA's Real Estate Acquisition Program and expedite the acquisition of units and/or buildings as public housing units.

#### ***Public Housing and HCV Programs/Uniform Housing Policy***

- \$75 Minimum Rent for Public Housing and HCV Programs (2009-01): CHA increased the minimum rent from \$50 to \$75 in FY2009 in public housing and HCV programs.
- Choose to Own Homeownership Program for HCV and Public Housing (2011-01): CHA expanded the HCV Choose to Own Homeownership Program to eligible current public housing residents. In FY2014, CHA received approval to modify program eligibility requirements to ensure participant success.

- Modified Family Self-Sufficiency Program for HCV and Public Housing (2014-01): CHA received approval in FY2014 to modify participation requirements for the Family Self-Sufficiency program for public housing and HCV participants to ensure participant success.
- Triennial Re-examinations for Households with Only Elderly/Disabled Participants for HCV and Public Housing (2014-02): CHA received HUD approval in FY2014 to implement a streamlined triennial re-examination schedule for public housing and HCV fixed income households consisting of only disabled and/or elderly participants.
- CHA Re-entry Pilot Program (2014-04): CHA is implementing a Re-entry Pilot Program for up to 50 eligible participants who are reuniting with a family member currently living in CHA traditional public housing or CHA's HCV Program or for eligible participants currently on a CHA wait list.

### **Public Housing**

- Office of the Ombudsman (2008-01): The Office of the Ombudsman provides designated staff to address the concerns of public housing residents living in mixed-income communities and serves as a liaison between residents and CHA leadership. The office assists residents in resolving issues and adapting to their new community.
- Biennial Re-examinations for Public Housing (2014-03): CHA is implementing biennial re-examinations for eligible public housing households.

### **Housing Choice Voucher Program**

- Biennial Re-examinations for HCV (2006-01): CHA continues to conduct biennial re-examinations for eligible HCV program participants.
- Exception Payment Standards (2010-02): CHA is authorized to implement exception payment standards that exceed the standard limit of 110% of HUD's published Fair Market Rents (FMRs) for the City of Chicago. In FY2014, CHA lowered the limit for exception payment standards to no more than 150% of HUD FMR for all new requests with phase out of existing exception payments that exceed 150% over the next three years.
- Owner Excellence – Vacancy Payments (2011-03): As part of the HCV Owner Excellence Program, CHA may provide a modest vacancy payment to eligible owners participating in the Owner Excellence Program who re-lease an eligible unit currently in the HCV program to another HCV participant.

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

- Exceed the Limit of 25% Project-Based Voucher (PBV) Assistance in Family Properties (2008-02): CHA may increase the percent of assisted PBV units in certain projects above the regulatory limit of 25% per family building.
- Authorization of Qualified PRA Owners/Property Managers to Perform Initial Eligibility Determinations and Reexaminations (2011-04): CHA allows qualified owners, as defined by CHA, to perform initial eligibility determinations and re-examinations of participants in the PRA Program.

- PBV Contract Commitments with 16-30 Year Initial Terms (2011-05): To facilitate the expansion of affordable housing opportunities through the use of PBVs, CHA uses MTW authority to enter into HAP contracts for initial terms between 16 and 30 years.
- Acceptance of City Certificates of Occupancy for Initial PRA Inspections (2011-06): CHA is authorized to accept the issuance of a Certificate of Occupancy by the City of Chicago as evidence of the property's compliance with Housing Quality Standards for initial PRA inspections.
- Payments during Initial Occupancy/Leasing – New Construction and Substantially Rehabilitated Properties (2011-08): CHA provides vacancy payments, as determined necessary on a project by project basis, during the initial operating lease-up period in order to provide an incentive for owner participation and to ensure the long-term viability of newly constructed and substantially rehabilitated properties.

Finally, in FY2016, 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.)*



# Section Two

## General Housing Authority Operating Information

## 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 FY2016

The following table summarizes planned new public housing units in FY2016.

Planned New Public Housing Units to be Added During FY2016

AMP Name and Number	Bedroom Size							Total Units	Population Type	Fully Accessible	Adaptable
	0	1	2	3	4	5	6+				
IL002002000 Altgeld Gardens	0	24	134	56	4	0	0	218	General	54	37
IL002165000 Casa Queretaro	0	8	7	0	0	0	0	15	General	3	12
AMP - TBD City Gardens	0	5	12	6	2	0	0	25	General	3	10
IL002166000 Rosenwald Courts Apartments	0	60	0	0	0	0	0	60	Senior	7	20
AMP - TBD St. Edmund's Oasis	0	2	6	10	1	0	0	19	General	1	4
AMP - TBD Sterling Park Apartments	0	24	31	9	2	0	0	66	General	3	13
AMP-TBD REAP	0	20	20	10	0	0	0	50	General	2	8
<b>Total Public Housing Units to be Added</b>								<b>453</b>			

#### Overview of New Public Housing Units in FY2016

##### Altgeld Gardens/Phillip Murray (IL002002000)

CHA continues to work with stakeholders to finalize the master plan for the Altgeld-Murray community, including residential and community facility components, and to pursue the ongoing Section 106 historic preservation process. In FY2015, CHA received approval from HUD for redevelopment plans for Blocks 7 and 8. CHA initially projected completion of the rehabilitation of 218 units in FY2015, however it is now projected for FY2016. Of the 218 units, 54 will be fully accessible and 37 will be adaptable.

##### Casa Queretaro (IL002165000)

In FY2016, CHA will deliver 15 public housing units at Casa Queretaro, a mixed-income development located at 17<sup>th</sup> Street and Damen Avenue, developed by The Resurrection Project, a not-for-profit community development corporation that serves the Pilsen neighborhood. The development will consist of a four-story, 45-unit rental building,

including 30 affordable units for households with a range of incomes up to 60% of AMI and 15 public housing units. Of the public housing units, three will be fully accessible and 12 will be adaptable.

City Gardens (formerly Maplewood Courts) (IL# to be assigned upon closing)

In FY2016, CHA plans to deliver 25 public housing units at City Gardens, a single phase, mixed-income rental development located on the former Maplewood Courts city/state site and part of the revitalization of the former Rockwell Gardens. City Gardens will consist of 76 rental units, including 25 public housing, 30 affordable and 21 market rate units. Of the 25 public housing units, three will be fully accessible and ten will be adaptable.

Rosenwald Courts Apartments (IL002166000)

In FY2016, the restoration of Rosenwald Courts, the historic Michigan Boulevard Apartments located in the Bronzeville community, will be completed. The City of Chicago, in partnership with private developers, is restoring this property to provide affordable senior and family housing opportunities. CHA is participating in this development to create 60 senior units for public housing residents and 60 PBV units through the Property Rental Assistance (PRA) program. Of the public housing units, seven will be fully accessible and 20 will be adaptable. The project also includes development of commercial space along 47th St. to help foster local businesses.

St. Edmund's Oasis (IL# to be assigned upon closing)

In FY2016, 19 public housing units will be completed at St. Edmund's Oasis off-site development as part of replacement housing for the Washington Park community. This mixed-income site contains 58 rental units, including 19 public housing and 39 affordable units on four separate parcels of land donated by the City of Chicago. Of the 19 public housing units, one will be fully accessible and four will be adaptable.

Sterling Park Apartments (IL# to be assigned upon closing)

In FY2016, 66 public housing units will be completed at Sterling Park Apartments, a redevelopment project consisting of adaptive reuse and historic rehabilitation of a vacated masonry industrial building located at 3333 W. Arthington Avenue in the North Lawndale Community. Mercy Housing Lakefront is developing 181 rental units, including 66 public housing units and 115 affordable units. The public housing units will include three fully accessible and 13 adaptable units.

Real Estate Acquisition Program Unit Delivery in FY2016

CHA launched the Real Estate Acquisition Program (REAP) in FY2013 as a strategy for offsite acquisitions of public housing units using traditional real estate acquisition processes primarily in CHA-designated opportunity areas. Public housing units acquired through this program will be counted toward the overall unit delivery progress once they become available for occupancy. CHA projects 50 new public housing units through REAP in FY2016.

**Dwelling Demolition**

CHA is considering the following demolition activity for FY2016. Other scattered site demolition activity previously proposed in annual plans may be carried out in FY2016.

Altgeld Gardens (IL002002000)

In FY2013, CHA completed a master planning process and presented a *Preferred Design Concept* site plan to Altgeld/Murray residents and members of the surrounding community at a September 2013 Town Hall meeting. The proposed site plan included the rehabilitation of offline units and existing community buildings, demolition of offline units at Murray Homes and construction of new community buildings and recreational areas. CHA also began the Section 106 historic preservation review process of the proposed site-plan in FY2013. In FY2014, CHA received approval from the Illinois Historic Preservation Agency (IHPA) to proceed with rehabilitation of units in offline blocks 7 & 8, as well as approval to begin renovating vacant office space in the Carver Park Fieldhouse that will house the new offices of the property manager and on-site social service provider. IHPA provided additional comments on the proposed site plan. In FY2015, CHA continued working with stakeholders to finalize the master plan and determined that the vacant units in Blocks 11, 12 and 13 should be demolished in order to expand existing recreational facilities, green space, and potential space for commercial development on the site. CHA anticipates reengagement of the residents and Section 106 process in the second quarter of FY2016.

In FY2016, CHA plans to move forward with the demolition of 244 offline units in blocks 11, 12, and 13 of Altgeld Gardens.

**Planned Public Housing Units to be Removed During FY2016**

PIC Dev. # / AMP and PIC Dev. Name	Number of Units to be Removed	Explanation for Removal
IL002033000 Scattered Sites Southeast	1	This property at 1419 E. 69 <sup>th</sup> Street was assessed for rehabilitation due to structural issues. Costs to return units to viability exceed current limits. CHA is considering options to demolish or dispose of this property in FY2016.
IL002002000 Altgeld Gardens	244	CHA anticipates demolition of offline units in Altgeld-Gardens (Blocks 11, 12, and 13) as part of the redevelopment of the Altgeld-Murray community.
<b>Total Number of Units to be Removed</b>	245	

**Non-Dwelling Demolition**

CHA does not anticipate any non-dwelling demolition in 2016.

**Project-Based Voucher Utilization in FY2016**

CHA has continued to expand the use of project-based vouchers (PBVs) since FY2001 to increase housing options for low-income families in the region. PBVs are issued directly to property owners, unlike tenant-based vouchers, and remain with the unit if a tenant moves out. CHA anticipates that 4,106 PBVs will be utilized in properties with units under either Housing Assistance Payment (HAP) contracts or an Agreement to Enter into a Housing Assistance Payment (AHAP) by the end of FY2016. This includes 3,806 total PBV units under HAP contract and 300 under AHAP.

***New Housing Choice Vouchers to be Project-Based in FY2016***

The following table provides an overview of new project-based vouchers planned to be under HAP in FY2016.

Property Name	FY2016 Anticipated Number of New Vouchers to be Project-Based	Description of Project
Access Housing	38	Scattered site rehab and new construction for disabled households.
Rosenwald Courts Apartments	60	Substantial rehab in Grand Boulevard for seniors.
65 <sup>th</sup> Infantry Regiment Veterans Housing	48	New construction veterans housing in Humboldt Park using project-based VASH vouchers.
Mod Rehab Conversions - TBD	125	Two conversion properties (1 family and 1 senior housing) have been identified in the Austin and South Shore communities.
Additional PRA/PBV - TBD	304	PRA has an open application process and proposals are anticipated in general and opportunity areas. The program seeks to expand affordable housing opportunities for families and individuals. The rental assistance remains with the property for the term of the contract as long as eligible tenants occupy the unit and the units meet all relevant physical condition standards.
<b>Anticipated Total New Vouchers to be Project-Based</b>	<b>575</b>	

<b>Anticipated Total Number of Project-Based Vouchers Committed at the End of the Fiscal Year (under HAP and AHAP Contract)*</b>	4,106
<b>Anticipated Total Number of Project-Based Vouchers Leased Up or Issued to a Potential Tenant at the End of the Fiscal Year*</b>	3,653

*\*Includes 341 city-state project-based units*

Throughout FY2016, CHA will continue to expand high-quality affordable housing opportunities in healthy and revitalizing neighborhoods in Chicago for families and individuals on CHA's waiting lists by providing PBV rental subsidies to additional units under the PRA program. CHA will continue to market the PRA program to developers and building owners through the ongoing solicitation and continue to accept applications on a rolling basis throughout the year.

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

City/State Sites

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 FY2016, CHA expects an additional 86 new supportive PBV units under HAP contracts (at Access Housing and 65th Infantry Regiment Veterans Housing) to be counted toward unit delivery. By the end of FY2016, CHA anticipates a total of 1,399 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 FY2016, 364 non-supportive family/senior PBV units are expected to be placed under HAP contracts to be counted toward unit delivery. CHA anticipates total of 1,639 non-supportive family/senior housing (non-RHI) PBV units counted toward overall unit delivery by the end of FY2016.

Regional Housing Initiative

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

In FY2012, HUD provided \$1 million to fund a three-year pilot program to expand RHI's capacity to increase quality affordable housing options throughout the region near jobs, transit, schools, shopping and other key neighborhood amenities for eligible families on the participating PHAs waiting lists. Under the Pilot, a central referral system was established that consists of applicants from each PHA's existing waiting lists who expressed interest in moving to other geographic areas throughout the region. In FY2015, CHA intends to maintain its participation in the RHI Pilot Program in order to offer applicants on CHA's wait list broader housing alternatives in opportunity areas.

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

In FY2016, CHA expects 42 additional RHI PBV units located outside Chicago. By the end of FY2016, a total of 200 CHA PBV units are expected to be under HAP contracts in the region through RHI. Of these, 69 are under contract in Chicago and are counted toward unit delivery progress.

Moderate Rehabilitation Transition to PRA/PBV

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

In FY2016, CHA anticipates that 125 additional units will transition to PRA/PBV, for a projected total of 177 units counted toward unit delivery by the end of FY2016.

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

In FY2016, CHA projects a total of 575 new PBV units under HAP contracts in Chicago to be counted toward unit delivery, including 86 supportive housing units and 364 non-supportive family/senior housing units, and 125 PBV units through Mod Rehab conversions. By the end of FY2016, CHA expects to have a total of 3,625 PBV units in Chicago counted toward unit delivery progress.

Other Changes to the Housing Stock Planned in FY2016

The following section describes planned changes to CHA’s housing stock during FY2016 by category, including Disposition Activity, Long-term Plan for Offline Units, Additional Capital Maintenance Activity and Additional Redevelopment Activity.

<b>Other Changes to the Housing Stock Planned in FY2015</b>	
<b><i>Planned Disposition Activity</i></b>	CHA plans to dispose of vacant land for future redevelopment for the Cabrini Development Zone Plan, the former Harold Ickes site, Oakwood Shores, and the former Lakefront properties. CHA also plans to dispose of non-dwelling property, potentially dispose of a scattered site property and dispose/lease a vacant residential building (former Jane Addams) for the development of the National Public Housing Museum.
<b><i>Long-term Plan for Offline Units Status</i></b>	As of the 2 <sup>nd</sup> quarter of FY2015, CHA has 2,823 public housing units across several categories that are currently offline and unavailable 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.
<b><i>Additional Planned Capital Maintenance Activity</i></b>	CHA will continue or begin various capital maintenance projects in FY2016.
<b><i>Additional Planned Redevelopment Activity</i></b>	CHA will continue redevelopment planning at several sites and anticipates several financial transaction closings in FY2016.

***Planned Disposition Activity***

The following disposition activity is planned for FY2016. Other disposition activity previously included and approved in annual plans may also be carried out in FY2016.

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IL Number	Development/ Site	Northern Boundary	Southern Boundary	Eastern Boundary	Western Boundary	Type of Disposition	Description of FY2016 Activity
IL002089000	Former Cabrini-Green	West Wendell Street	West Walton Street	North Orleans Avenue	North Larrabee Street	Ground Lease and/or Fee Simple	CHA plans to ground lease or convey land for the development of mixed income housing, retail or other land uses.
L002089000	Former Cabrini-Green	West Scott Avenue	West Division Street	North Larrabee Street	North Halsted Street	Ground Lease and/or Fee Simple	CHA plans to ground lease or convey land for the development of mixed income housing, retail or other land uses.
L002089000	Former Cabrini-Green	West Blackhawk Avenue	West Evergreen Avenue	North Larrabee Street	North Ogden Avenue and North Clybourn Avenue	Ground Lease and/or Fee Simple	CHA plans to ground lease or convey land for the development of mixed income housing, retail or other land uses.
IL002016000	Former Harold Ickes Homes	Cermak	25 <sup>th</sup> Street	South State Street	South Federal	Ground Lease and/or Fee Simple	CHA plans to ground lease or convey land for the Harold Ickes Phase I development.
IL002017000, ILO2033	Former Ida B. Wells Homes, Darrow Homes, Wells Extension and/or Madden Park Homes	35 <sup>th</sup> Street	39 <sup>th</sup> Street	Ellis Avenue	South Rhodes Street	Ground Lease and/or Fee Simple	CHA plans to ground lease or convey land for the Oakwood Shores Phase 2B2 development.
IL002017000	Former Ida B. Wells Homes, Darrow Homes, Wells Extension and/or Madden Park Homes	3858 South Cottage Grove				Lease and/or Fee Simple	CHA plans to lease or convey this non-dwelling property to the Chicago Park District. The facility will be used for recreational programming and/or social services.
IL002128000	Former Lakefront Properties	East 41 <sup>st</sup> Place	East 42 <sup>nd</sup> Place	South Lake Park Avenue	South Oakenwald Avenue	Fee Simple and/or Quit Claim Deed	CHA plans to dispose of vacant land to create new homeownership units as part of the Lakefront Properties redevelopment plan.
IL002033000	Scattered Sites Southeast	1419 E. 69 <sup>th</sup> Street				Demolition and/or Sale	This 1-unit scattered site property was assessed for rehabilitation due to structural issues. Costs to return units to viability exceed current limits. CHA is considering options to demolish or dispose of this property in FY2016.
IL002001000	ABLA	1322-24 West Taylor, 917-27 South Ada				Long Term Lease/Purchase Agreement	CHA plans to permit the long term use of a portion of the vacant Jane Addams residential building for the development of a National Public Housing Museum (NPHM). The NPHM intends to rehabilitate a certain portion of the vacant Jane Addams residential building on this property.
IL002089000	Cabrini Green	Locust St	Jesse White Center	Sedgwick St	Alley east of Hudson Ave	Fee simple	Dispose of a portion of vacant property immediately north of the Jesse White Center to the Chicago Park District for a community park.

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IL999999999	Cabrini Green	Rail road tracks south of North Ave	Blackhawk Ave	Larrabee St	Orchard Park Development	Fee simple	Dispose of the Near North High School ball field property to the Chicago Park District for a community park.
IL999999999	6314 South Ellis (former scattered site)	63 <sup>rd</sup> St	65 <sup>th</sup> St	Greenwood Ave	Ingleside St	Fee simple	Dispose of vacant property for market value.
IL002033000	Scattered Sites	3605 W. Douglas Blvd.				Fee Simple	CHA has demolished the structure and is now planning for disposition of the vacant land due to lack of amenities and services in the area.
IL002033000	Scattered Sites	2828 S. Drake Ave.				Fee Simple	CHA plans for the disposition of a vacant property requiring substantial repair that would exceed the potential market value of the property.
IL002032000	Scattered Sites	2128 N. Moody Ave.				Fee Simple	CHA plans for the disposition of a vacant property requiring substantial repair that would exceed the potential market value of the property.
IL002034000	Scattered Sites	8840 S. Escanaba Ave.				Fee Simple	CHA plans for the disposition of a vacant property requiring substantial repair that would exceed the potential market value of the property.
IL002034000	Scattered Sites	8754 S. Buffalo Ave.				Fee Simple	CHA plans for the disposition of a vacant property requiring substantial repair that would exceed the potential market value of the property.
IL002034000	Scattered Sites	10527 S Corliss Ave.				Fee Simple	CHA plans for the disposition of a vacant property requiring substantial repair that would exceed the potential market value of the property.
IL002035000	Scattered Sites	1419 East 69 <sup>th</sup> Street				Fee Simple	CHA plans for the disposition of a vacant property requiring substantial repair that would exceed the potential market value of the property.
IL002076000	Parking lot and non-dwelling building at Caroline Hedger Apartments	6418 North Sheridan Road				Disposition of non-dwelling building and parking lot/99-year lease	CHA received a proposal from a Pre-Qualified Development Team to transform the existing non-dwelling building and parking lot into a mixed-use development, which would include parking for Caroline Hedger Apartments, new community space for the residents of Caroline Hedger Apartments, retail and additional residential housing. As required,  CHA has requested alternative proposals for the development of

				this property from other Pre-Qualified Development Teams.
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**Long Term Plan for Offline Units Status**

As of 2<sup>nd</sup> quarter 2015, CHA has 2,823 public housing units across several categories that are currently offline and unavailable for occupancy for HUD-approved reasons. In coordination with HUD, CHA continues to prioritize reducing the number of offline units and making additional units available for occupancy as soon as possible. CHA also provides quarterly status updates directly to HUD and publicly through CHA’s website. The following is a summary and status of CHA’s long-term strategies to address offline units by category as of the end of 2<sup>nd</sup> quarter of 2015.

Units pending redevelopment/planning

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

*Altgeld Gardens/Phillip Murray – 633 offline units (IL002002000)*

CHA continues to work with stakeholders to finalize the master plan for the Altgeld-Murray community, including residential and community facility components, and to pursue the ongoing Section 106 historic preservation process. In FY2015, CHA received approval from HUD for redevelopment plans for Blocks 7 and 8. In FY2016, CHA expects to complete the rehabilitation of 218 units.

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

CHA will act as master developer for the redevelopment of Parkview/Fannie Emanuel Senior Apartments to provide 100% low-income housing for seniors, new resident community spaces and other site improvements. In FY2015, CHA plans to close the transaction through the Rental Assistance Demonstration (RAD) Program. Rehabilitation work is planned to be completed in FY2017.

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

In FY2015, CHA finalized a Development Zone Plan (DZP) for the remaining portions of Cabrini-Green, including Frances Cabrini Rowhouses, with the assistance of the City of Chicago’s Department of Planning and Development, Chicago Park District, Chicago Department of Transportation, Chicago Public Schools, and the Near North Working Group. The DZP proposes preferred land uses including housing, retail, open space and other uses as well as reintegration of the street grid, which informs the solicitation of development proposals to occur in three phases. CHA plans to select development teams for the first phase of the DZP by the 2<sup>nd</sup> quarter of FY2016. CHA will plan for a solicitation for the Cabrini Rowhouses upon resolution of pending litigation.

*Henry Horner Superblock – 88 offline units (IL002093000)*

Redevelopment of the Horner Superblock will transform the existing public housing property into a mixed income development with 200 total rental units, including 95 for public housing, 50 for affordable and 55 for market rate residents. CHA continues to work with development partners to begin redevelopment in the 1<sup>st</sup> quarter of FY2016 with unit delivery in FY2017. The remaining 105 public housing units will be replaced through off-site acquisition or redevelopment.

*Lathrop Homes – 753 offline units (IL002022000)*

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CHA remains committed to delivering 400 units of replacement family public housing units through a combination of historically preserved housing, new housing, retail and other amenities in a mixed-income community. In FY2016, CHA and its development partner plan to close a real estate transaction for the first phase of redevelopment at Lathrop Homes.

Units undergoing capital maintenance

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

In FY2016, a total of eight major capital projects will continue or begin, with five of the eight projects to be completed in FY2016. The following is a summary of major capital projects for FY2016.

FY2016 Major Capital Projects				
IL Number	Project/Site	Construction Start	Units Back Online/Available for Leasing	Project Description
IL002075000	Daniel Hudson Burnham Apartments	July 2015	March 2016	Water infiltration issues
IL002052000, IL002052100	Lincoln Perry Apartments/Annex	October 2013	March 2016	Enhanced new life safety features (sprinklers, and interior cameras), replacement of plumbing risers, kitchens, and baths
IL002084000	Judge Slater Annex	July 2014	March 2016	Enhanced new life safety features (sprinklers, and interior cameras), replacement of plumbing risers, kitchens, and baths
IL002057000	Judge Fisher Apartments	May 2015	November 2016	Enhanced new life safety features (sprinklers, elevator controls and interior cameras), kitchens and baths, and a new heating system
IL002086000	Major Lawrence Apartments	May 2014	December 2016	Enhanced new life safety features (sprinklers, elevator controls and interior cameras), replacement of plumbing risers, kitchens, and baths
IL002078000	Minnie Riperton Apartments	May 2014	December 2016	Enhanced new life safety features (sprinklers, elevator controls and interior cameras), replacement of plumbing risers, kitchens, and baths

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IL002076000	Caroline Hedger Apartments	June 2014	December 2016	Enhanced new life safety features (sprinklers, elevator controls and interior cameras), replacement of plumbing risers, kitchens, baths, and window replacement
Various	General Renovation of Scattered Site Units	September 2013	September 2017	Varies per site; generally complete renovation and minor site work

Units pending demolition/disposition

Units in this category are pending demolition or disposition and will not come back online. As of the 2<sup>nd</sup> quarter of FY2015, there are 41 units in the approved “demo/dispo” category in PIC. These units are pending disposition for the creation of the National Public Housing Museum. CHA anticipates finalizing disposition activity and removing the units from inventory in FY2016.

Units used for non-dwelling purposes

As of 2<sup>nd</sup> quarter of FY2015, CHA currently uses only 263 units for non-dwelling purposes. CHA continues to evaluate non-dwelling use of units across its portfolio.

***Additional Planned Capital Maintenance Activity in FY2016***

CHA will continue or begin the following projects in FY2016:

- Ongoing life safety code compliance projects at various Senior Housing sites.
- Major capital maintenance in CHA’s scattered site properties including renovation of vacant offline units.
- Mechanical, electrical, plumbing, and/or envelope improvements to several senior buildings including Caroline Hedger Apartments (IL002076000), Daniel Burnham Apartments (IL002075000), Judge Slater Annex (IL002084000), Major Lawrence Apartments (IL0020086000, Lincoln Perry Apartments (IL002052000), Lincoln Perry Annex (IL002052100), Minnie Riperton Apartments (IL002078000) and Judge Fisher Apartments (IL002057000).
- General renovation of Altgeld Gardens Common Buildings between Blocks 7 & 8 including: Gautreaux Child Care, CYC Building, Carver Park Fieldhouse, Admin/Maintenance Building, New Day Care, New Library Building and Adult Training Center.

***Additional Planned Redevelopment Activity in FY2016***

Harold Ickes Homes (IL002016000)

In FY2015, CHA selected a development team to redevelop the former Ickes site as a mixed-income, mixed-use development, including public housing and other residential, commercial, institutional, and recreational components. The new property will contain a minimum of 200 public housing units. CHA and its development partner plan to close a transaction for the first phase of development in late FY2016 or FY2017.

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

In FY2017, CHA in partnership with a private development partner plans to close a transaction for a new residential 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. More specifically, it is the residential component of the Quad Communities Arts & Recreation Center development. The CHA is planning to create approximately 50 to 60 new mixed-income housing units.

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

In FY2016, CHA plans to close the real estate transaction for Washington Park replacement housing at 45<sup>th</sup> & Cottage Grove. This initial phase of development will create 70 new rental apartments including 17 public housing, 32 affordable and 21 market rate units.

Funding for Redevelopment Activities

In response to Choice Neighborhoods or other Federal Notices of Funding Availability (NOFAs) released in FY2016, CHA may submit application(s) for grant funding for redevelopment and/or planning activities.

**General Description of Planned Capital Expenditures in FY2016**

<b>General Description of Planned Capital Fund Expenditures During FY2016</b>
<p>CHA's anticipates a total of \$291.4M in planned capital expenditures for FY2016.</p> <ul style="list-style-type: none"><li>• \$97.3M in planned construction activities, upgrades and repairs at CHA family buildings including Altgeld Gardens/Phillip Murray, Cabrini, Washington Park, Brooks and Horner.</li><li>• \$89.2M in planned construction activities, upgrades and repairs at CHA senior buildings. This includes required life safety and fire sprinklers and other rehabilitation work at Caroline Hedger Apartments, Judge Slater Apartments, Judge Slater Annex, Minnie Ripperton Apartments, Major Lawrence Apartments, Judge Fisher Apartments, Dearborn Apartments and Albany Terrace. This amount includes \$40M of repairs at senior buildings that will transition to the Rental Assistance Demonstration (RAD) program.</li><li>• \$13.2M in planned construction activities, upgrades and repairs at various CHA scattered sites properties.</li><li>• \$16.8M in construction management fees and planned construction activities, upgrades and repairs at CHA community buildings.</li><li>• \$74.9M in construction or planning/pre-development activities for mixed-income/mixed-finance properties, including Sterling Apartments, City Gardens, St. Edmund's Oasis, Fannie Emanuel/Parkview, Clybourn &amp; Division, Horner Superblock, Harold Ickes- Phase 1, Park Boulevard Phase IIIA, Lathrop, 45th Cottage Grove, Parkside IIIA Condo, Oakwood Shores IIB, Roosevelt Square – Phase IIA, Real Estate Acquisition Program and other master planning activities.</li></ul>

**Section II-B: Leasing Information**

**Planned Number of MTW Households Served at the End of FY2016**

By the end of FY2016, CHA currently anticipates serving a total of 64,989 MTW households across HCV and public housing programs. CHA continues to finalize MTW HCV leasing projections for FY2015.

**Planned Number of Households Served at the End of FY2016**

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	18,064	216,768
Federal MTW Voucher (HCV) Units to be Utilized	46,925	563,100
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>64,989</b>	<b>779,868</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 FY2016**

By the end of FY2016, CHA anticipates serving a total of 2,079 households through non-MTW HCV programs, including Veterans Affairs Supportive Housing (VASH), Moderate Rehabilitation and Mainstream 5-Year programs.

Non-MTW HCV Program	Planned Number of Households Served	Planned Number of Unit Months Occupied/Leased
VASH	1,053	12,636
Mod Rehab	976	11,712
Mainstream 5-Year	50	600
<b>Total Non-MTW Households</b>	<b>2,079</b>	<b>24,948</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 FY2016**

Description of any Anticipated Issues Related to Leasing of Public Housing, Housing Choice Vouchers or Local, Non-Traditional Units and Solutions in FY2016

Housing Program	Description of Leasing Issues and Solutions
Federal MTW Public Housing Program	<p>As described in previous sections, CHA will continue to prioritize the issue of offline units in FY2016 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 FY2016, CHA will continuously monitor the local rental market for available units given the increase in HCV leasing.

## Section II-C: Wait List Information

In FY2016, CHA will maintain the following major wait lists across public housing and Housing Choice Voucher programs.

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

CHA currently administers four applicant based waitlists within the Public Housing Program— Family Housing (Community-Wide) Wait List, Scattered Site (Community Area) Wait Lists, Senior Site-Based Wait Lists, and Lake Parc Place (Income-Restricted) Site-Based Wait List.

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

The Family Housing (Community-Wide) Wait List contains adult applicants who are interested in units within CHA's city-wide traditional family portfolio. This wait list was last opened in late FY2014 and will remain partially opened in FY2016.

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

The Scattered Site (Community Area) Wait Lists contain applicants interested in housing opportunities in CHA's scattered site portfolio. CHA has a wait list for each of the 77 community areas in the City of Chicago. In general, these wait lists are opened periodically (for approximately 15-30 days) in order to maintain an adequate list of applicants. CHA will continue to open Scattered Site (Community Area) Wait Lists based on need in FY2016.

#### 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 FY2016, all senior site-based wait lists will be open and accepting applications.

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

The Lake Parc Place Site-Based Wait List contains applicants interested in units at CHA's Lake Parc Place property who are in the 51-80% Area Median Income (AMI) range. Lake Parc Place's Tenant Selection Plan specifies the property must achieve a balance of households with AMIs of 0-50% and 51-80%. In FY2016, the Lake Parc Place site-based wait list will be open for households at 51-80% AMI.

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

CHA established a separate PBV (PRA) wait list through the FY2014 wait list opening. The wait list will provide applicants with opportunities for project-based voucher units that consist of family, senior or supportive housing. CHA maintains 19 individual senior site-based wait lists for PBV (PRA) sites, which will be opening in FY2016.

### **HCV Wait List**

In FY2016, CHA plans to continue the screening of applicants on the HCV Wait List and, where eligible, offer an opportunity to be housed by becoming a participant in CHA's HCV Program. CHA's HCV Wait List was last opened in late FY2014, and will remain partially opened in FY2016.

### **Wait List Projections for FY2016**

<b>Wait List Information Projected for the Beginning of FY2016</b>				
<b>Housing Program(s)</b>	<b>Wait List Type</b>	<b>Number of Households on Wait List</b>	<b>Wait List Open, Partially Open or Closed</b>	<b>Are There Plans to Open the Wait List During FY2016</b>
Federal MTW Public Housing Units	Community-Wide (Family Housing)	40,565	Partially Open	No
Federal MTW Public Housing Units	Program Specific (Scattered Site/Community Area)	6,657	Partially Open	Yes
Federal MTW Public Housing Units	Site-Based (Senior)	13,393	Open	Yes
Federal MTW Public Housing Units	Site-Based (Lake Parc Place)	878	Partially Open	Yes
Federal MTW Project Based Voucher Program	Program Specific (PRA Program)	16,335	Closed	No
Federal MTW Project Based Voucher Program	Site-Based (Senior PRA)	0*	Open	Yes
Federal MTW Housing Choice Voucher Program	Program Specific (Tenant-Based Vouchers Only)	45,690	Partially open	No

\* Site-based Senior PRA wait lists are not open yet but will be open in FY2016.

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

<p><b>Community-Wide (Family Housing)</b> In FY2016, the Community Wide wait List will remain open for the families that meet the eligibility criteria for and are participating in a CHA demonstration program or special initiatives.</p>
<p><b>Community-Area (Scattered Sites Wait Lists)</b> Community Area wait lists are open to residents of specific Chicago Community Areas who can meet residency requirements. In FY2016, CHA will open these wait lists as needed for specific community areas.</p>
<p><b>Lake Parc Place Site Based Wait List</b> Public housing units at Lake Parc Place are offered through a site-based wait list, in accordance with the Tenant Selection Plan, to achieve a balance of households with Area Median Incomes of 0-50% and 51-80%. In FY2016, CHA anticipates the site-based waiting list will be open for families within the 51-80% AMI category, who require a 1, 2 or 3 bedroom unit.</p>

**PBV (PRA) Wait List**

In FY2016, 19 individual PBV (PRA) Senior Site-Based Wait Lists will remain open for applicants who can meet site specific requirements.

**HCV Wait List**

In FY2016, 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

**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 FY2016**

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

**Altgeld-Murray Site Based Wait List Proposal**

CHA is proposing to establish a site-based waitlist for Altgeld-Murray Homes to address leasing challenges at this site.

*Background*

Situated adjacent to Riverdale, IL, Altgeld-Murray Homes (Altgeld) is located along the southern edge of Chicago's city limits and is generally bounded by 130<sup>th</sup> Street to the North, 134<sup>th</sup> Street to the South, Doty Avenue to the east, and St. Lawrence Avenue to the west. The property's secluded location and limited area amenities pose on-going challenges for marketing and leasing. Current renovation plans, estimated at \$300M, will markedly improve interior and exterior property conditions and the development's overall appeal. As part of Altgeld's interior renovation plan, 218 newly renovated one- to four-bedroom units will be available for occupancy beginning in the second quarter of FY2016. A site-based waitlist is critical to the success of Altgeld's overall redevelopment initiative.

*Leasing Challenges*

Currently, applicants on the Community-Wide Waitlist have the opportunity to select a geographic area in which they would prefer to reside (North, South, Central, Mid-South, or West) or select to be housed in the first available unit across all CHA family properties. Only applicants from the Community-Wide Waitlist that have expressed a preference for housing opportunities in CHA's South Geographic Region and those on the First Available waitlist with no geographic housing preference are eligible for outreach and screening opportunities at Altgeld.

The South Geographic Region generally includes all areas in Chicago south of 79<sup>th</sup> Street. In addition to Altgeld, this waitlist is utilized by Scattered Site properties in the area (249 units) and other large family developments—Trumbull Park Homes (465 units) and Lowden Homes (127 units). The First Available Waitlist is used by all family properties across the city.

There are currently nearly 27,000 applicants across the South Geographic Region and First Available waitlists, and less than 10% of these applicants are on the South Geographic Region waitlist. When seeking to fill unit vacancies, these lists are merged, sorted by date of application and applicable ranking preferences, and a subset of names are provided to CHA

property management firms for outreach and screening. Relying on these lists to lease Altgeld’s new units will result in the South Geographic Region waitlist being exhausted and the First Available waitlist being significantly depleted.

Bedroom Type (Non-ADA & ADA Units)	Altgeld Unit Mix (ADA & Non-ADA Units)	South Region Waitlist	1 <sup>st</sup> Available Waitlist	South Region & 1 <sup>st</sup> Available Combined Total
0 bedrooms	0	5	125	130
1 bedrooms	24	887	10,588	11,475
2 bedrooms	134	746	12,126	12,872
3 bedrooms	56	107	2,117	2,224
4 bedrooms	4	9	107	116
5+ bedrooms	0	3	116	119
<b>Total</b>	<b>218</b>	<b>1,757</b>	<b>25,179</b>	<b>26,936</b>

Current trends show this property maintains a low applicant lease rate and as a result would exhaust and nearly deplete these waitlists by year end. Approximately 1.5 out of 10 applicants are eligible for housing and less than half of these applicants actually lease a unit. Nearly three-quarters of applicants are removed from the waitlist for non-responsiveness, by request, for non-good cause refusals, or for failing screening. Transitioning to an Altgeld site-based waitlist ensures higher leasing ratios, as applicants self-selecting this property as their housing preference will yield improved leasing results. In addition, it preserves a large proportion of waitlist applicants on the Community-Wide Waitlist for use by other family properties.

*Implementation Plan*

Consistent with Lake Parc Place and Senior Site-Based waitlists, the Altgeld-Murray Homes Site-Based Waitlist will allow applicants to complete and submit electronic housing applications from CHA’s website. The waitlist will be subdivided by bedroom type, accessible/mobility units, and sensory units. It will also allow for ranking preferences in the following order of priority:

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

All Community-Wide waitlist applicants will be informed of the availability of newly renovated one- to four-bedroom units at Altgeld and of CHA’s intent to transition this property to a site-based waitlist. CHA will communicate with applicants by telephone and/or email. Automated robo calls will be made to all applicants’ primary telephone numbers (home, mobile, and work) and electronic mail will be delivered to applicants’ primary and alternate email addresses. Notification letters will only be mailed to applicants that have not provided CHA with a phone number or email address.

Existing applicants will be notified of a 60-day time period in which they have the opportunity to be placed on Altgeld’s site-based waitlist and maintain their original waitlist application date. This offer will in essence provide existing applicants a priority over households that are not currently on CHA’s Community-Wide Waitlist, as waitlist applications are first sorted and screened by application date followed by ranking preferences. Existing applicants that apply for Altgeld’s site-based waitlist after the 60-day period will no longer be eligible for the priority and will be placed on the waitlist based on the date in which their Altgeld site-based wait list .application is submitted followed by applicable ranking preferences.

Existing applicants will also be informed that regardless of when they apply for Altgeld’s site-based waitlist, by opting to be placed on this waitlist, they will be removed from the Community-Wide Waitlist and will only be contacted and screened for housing opportunities at Altgeld.

# 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 FY2016.

### MTW Activities Related to Public Housing and HCV

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

- **Description and Impact:** In FY2015, CHA designed a Mobility Counseling Demonstration Program for applicants on the public housing waitlist as of December 16, 2014 who have at least one school-aged child under the age of 13. Applicants who consent to participation in the program would move to either a CHA Opportunity or Gautreaux-designated General Area utilizing a tenant-based Housing Choice Voucher. Participants would also agree to participate in mobility counseling services, which include education and information on tenant rights and responsibilities, community tours, and housing search counseling. Further, participants who move with the voucher will receive \$500 towards their move in fee or security deposit. These services are consistent with CHA's existing mobility counseling program. In addition, participants will receive 2 years of follow up services through CHA's FamilyWorks program, including social service supports necessary for obtaining and retaining employment and/or enrollment in education or training programs.

CHA determines eligibility by filtering the existing public housing waitlist and sending outreach letters to potential candidates who have more than one person listed in the household composition. If a candidate does not respond to the outreach letter, they remain on the public housing waitlist. If a candidate does respond to the letter, household eligibility is determined in order to ensure that the household has a least one school-aged child under the age of 13 along with other requirements. If the household is deemed eligible by CHA, they are then referred to participate in a HCV screening and briefing/orientation prior to voucher issuance. Only participants who lease a unit are removed from the public housing wait list. If at any time during the outreach, eligibility and selection process a candidate is deemed ineligible, the household maintains their position on the waitlist.

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

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

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

Details of the full work requirement activity can be found on page 33 under that activity.

- **Implementation Year:** Proposed FY2016

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

Standard Metric	Unit of Measurement	Baseline	FY2016 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).	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 in FY2016.
SS-3: Increase in Positive Outcomes in Employment Status*	Other category: Having earned income	In FY2014, 2,464 (59%) of 4,154 "work-able" public housing heads of household subject to the work requirement had income from wages.	The percent of program participant heads of household with income from wages will be consistent with CHA's average for public housing households subject to the work requirement in FY2016.
		In FY2014, 59% of "work-able" public housing heads of household subject to the work requirement had income from wages.	
SS-4: Households Removed from TANF	Number of households receiving TANF assistance (decrease).	Zero program participants were removed from TANF prior to implementation of the demonstration program	5 households will be removed from TANF in FY2016.
SS-5: Households Assisted by Services that Increase Self Sufficiency	Number of households receiving services aimed to increase self-sufficiency (increase).	Zero program participants received services prior to implementation of the demonstration program.	100 households participating in the program will receive services in FY2016.
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.	The average subsidy per HCV household with program participants will be consistent with CHA's average subsidy per HCV household in FY2016.
SS-7: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	Zero dollar increase in agency rental revenue prior to implementation of the demonstration program.	The total contribution of participation households will be consistent with CHA's average in FY2016.
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.	The number of program participant households subject to the work requirement with all adults in compliance will be consistent with CHA's

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			average for public housing households subject to the work requirement in FY2016.
HC-5: Increase in Resident Mobility	Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	Zero program participants received services prior to implementation of the demonstration program.	100 households will be housed in FY2016.
<p>*For SS-1 and SS-3 tracking, CHA defines "work-able residents" as those age 18 to 54 who are not receiving SSI, SSDI or a pension. CHA defines "employed" based on whether income from wages is recorded in Yardi, CHA's system of record.</p> <p>**For SS-8, CHA is establishing households in which all adults are compliant with the work requirement as a definition of self-sufficiency.</p>			

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

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>2</sup> CHA provides resources to aid residents in fulfilling the work requirement through case management services and workforce development programs. The impact of the public housing work requirement is a greater number of residents engaged in employment, education, job training, and community service in order to achieve self-sufficiency.

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

<sup>2</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).

Beginning in FY2016, CHA is proposing the following updates to the public housing work requirement.

- CHA is updating this activity to reflect that existing work requirements in public housing and mixed-income properties transitioning to Project-Based Vouchers (PBV) and/or added through transfer of assistance under the RAD program, as outlined in CHA’s ACOP and Tenant Selection Plans, will carry over for any individual who was previously subject to a work requirement as well as for new applicable residents after RAD PBV conversions. The work requirement policy for RAD PBV sites is also outlined in Chapter 18 of the HCV Administrative Plan, which was released for public comment in November 2014 and approved by CHA’s Board in January 2015.
- CHA is proposing to increase the time period for each Safe Harbor period from 90 days to 180 days. CHA has determined that 90 days is insufficient time for a resident to establish an action plan to meet the requirement, which often results in multiple Safe Harbor requests. Increasing the time period to 180 days will enable residents to work with a service provider to create and implement an action and engagement plan. CHA will revise the ACOP as necessary after approval of this change.
- CHA is requesting authorization to require participation in services for all residents who receive Safe Harbor and for those who are non-compliant with the work requirement. Mandatory services would be provided by CHA’s FamilyWorks program. FamilyWorks is currently a voluntary program, however this requirement will ensure that FamilyWorks service providers intervene in a timely manner to provide assistance. Engagement in FamilyWorks as part of the work requirement will enable residents to receive needed assistance faster in order to be compliant with the work requirement. CHA would implement the following procedures to enforce this requirement:
  - The resident and service provider will develop and sign a resident-driven action plan upon the initial request for Safe Harbor, which outlines what is needed to become compliant with the work requirement.
  - At the end of the 180-day Safe Harbor period (or upon the resident obtaining employment), the FamilyWorks service provider will confirm that the resident is engaged with the work requirement, as defined in the agreed-upon individual action plan.
  - Residents who are engaged, as defined by the action plan, but who need additional time will be approved to receive Safe Harbor or additional Safe Harbors, as applicable.
  - Residents who are not engaged, as defined by the action plan, and are not meeting the work requirement will not be approved to receive additional Safe Harbors.
  - Non-compliant residents are subject to lease termination.
- Implementation Year: FY2009, proposed updates in 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.
- Standard Metrics:

Standard Metric	Unit of Measurement	Baseline	FY2016 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 FY2016, the average income from wages for households with a “work-able” adult subject to the work requirement will remain stable at

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			\$12,085 (5,051 households).
SS-3: Increase in Positive Outcomes in Employment Status*	Other category: Having earned income	2,347 “work-able” heads of household subject to the work requirement had income from wages in 2008. <hr/> 52.7% of work-able heads of household subject to the work requirement had income from wages in 2008.	In FY2016, “work-able” heads of household subject to the work requirement with income from wages will remain stable at 2,500. <hr/> In FY2016, “work-able” 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” households with a “work-able” adult subject to the work requirement received TANF.	In FY2016, “work-able” households with a “work-able” adult subject to the work requirement receiving TANF will remain stable at 3,000.
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 FY2016, the number of public housing households with a “work-able” adult subject to the work requirement engaged with service providers through Family Works will remain stable at 4,300 (out of 5,051 households).^
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 household was \$6,519 (based on 21,417 eligible units).	The average subsidy per household is projected to be approximately \$8,563.32 (based on 17,631 eligible units) in FY2016.^
SS-7: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	In FY2013, households with a “work-able” adult subject to the work requirement contributed a total of	In FY2016, the total contribution of households with a “work-able” adult subject to the work requirement will

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		\$21,401,844 (5,081 households).	remain stable at \$22,000,000 (5,051 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 FY2016, the percent and number of households subject to the work requirement that have all adults in compliance will remain stable at 47% (2,357 of 5,051 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 FY2016, the average wait time for 11,217 applicants on the Public Housing Family Wait List will remain stable at 54 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> <p>^ CHA will update the tracking of this metric upon HUD approval of changes to this activity and reflect changes in the FY2016 MTW Annual Report.</p> <p>^^These metrics may be updated after RAD PBV conversions.</p>			

• Additional Metrics:

Additional Metric	Unit of Measurement	Baseline	FY2016 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 FY2016, the percentages of residents in each work requirement compliance status will increase by 1%; those in Safe Harbor will decrease by 1% (pending HUD approval of changes to this activity).
<p><u>Compliant:</u> Residents who are meeting the work requirement through authorized activities, including employment or other work experience opportunities, school/training participation or volunteer/community service opportunities.</p> <p><u>Exempt:</u> Residents age 55 or older or those who meet disability/caretaker or other requirements for an exemption.</p> <p><u>Safe Harbor:</u> Residents who are unable to comply with the work requirement may be eligible for Safe Harbor under certain circumstances, including but not limited to reasonable accommodation, temporary medical conditions, recent employment separation, and other circumstances that present barriers to finding/maintaining employment.</p>			

**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, and Attachment C, Section D(3)(b) which gives CHA authority to implement resident eligibility policies in the HCV program that differ from standard program requirements and regulations.

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

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

- **Description and Impact:** CHA is participating in the Rental Assistance Demonstration (RAD) program and is working to transition more than 10,000 public housing units to Project-Based Vouchers (PBV) through RAD. HUD regulations state that the Earned Income Disregard (EID) policy is only available to residents with disabilities, for the Housing Choice Voucher (HCV) program. For public housing sites transitioning to PBV under the RAD program (as well as those sites added through transfer of assistance), CHA is proposing to retain the EID policy for residents in RAD PBV units, which will allow any eligible resident, including non-disabled persons, to have the opportunity to utilize EID.  
As of February 2016, 17 households in sites transitioning to RAD PBV have an EID exclusion. CHA is requesting this authorization to prevent undue hardship on current and future working heads of household and families in sites that transition to RAD.
- **Implementation Year:** proposed FY2016
- **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	FY2016 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 FY2016, the average income from wages for households in RAD PBV sites with a "work-able" adult will remain stable at \$14,000.
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.	In FY2016, the number of "work-able" heads of household in RAD PBV sites

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		66% of “work-able” heads of household in RAD PBV sites had income from wages in FY2015.	with income from wages will remain stable at 150. In FY2016, the percent of “work-able” heads of household in RAD sites with income from wages will remain stable at 66%.
*For SS-1 and SS-3 tracking, CHA defines “work-able residents” as those age 18 to 54 who are not receiving SSI, SSDI or a pension. CHA defines “employed” based on whether income from wages is recorded in Yardi, CHA’s system of record.			

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

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

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

Standard Metric	Unit of Measurement	Baseline	FY2016 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.	CHA is unable to provide a benchmark for FY2016 due to an evaluation of how inspections are conducted which will result in changes in FY2016. CHA will report the actual FY2016 cost of inspections for sites transitioning to RAD PBV in the FY2016 MTW Annual Report.

- **Data Collection:** CHA will track the cost of inspections for RAD PBV sites.
- **Authorization:** Attachment C, Section 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 portfolio of RAD properties, CHA is requesting authorization to exceed the Fair Market Rent (FMR) cap of 110% for RAD PBV properties (under current standard Project-Based Voucher rules), as needed to retain the subsidy level CHA currently receives for properties. FMR is one of three criteria used to set initial contract rents under the RAD program – the other two criteria are current subsidy levels and reasonable (market) rents; the lower of the three applies.

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

CHA has made a commitment to, at minimum, retain existing services and property maintenance at the level residents experience today. The increase of the cap from 110% to 120% of FMR would better safeguard the impacted CHA communities against a reduction in funds that could impact operations, service levels, and appropriate capital investments. As RAD was designed by HUD to be a budget-neutral program to preserve subsidized housing, the requested flexibility would allow CHA to retain current subsidy levels and maintain current standards for operating RAD PBV sites. Further, the requested increase to up to 120% of FMR is consistent with the rent cap for RAD Project-Based Rental Assistance (PBRA) properties.

- **Implementation Year:** Proposed FY2016
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2016 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 FY2016, a minimum of 2,242 dwelling units will be available in nine properties transitioning to RAD PBV that may require an increased FMR threshold 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.



# 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 FY2015.

**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 FY2016, CHA plans to deliver an additional 1,028 public housing and project-based voucher units.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2016 Benchmark
HC-1: Additional Units of Housing Made Available	Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Zero units were delivered toward the 25,000 unit goal prior to FY2000.	CHA will deliver 685 new housing units in FY2016 toward the 25,000 unit goal.
HC-2: Units of Housing Preserved	Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	Zero units were rehabilitated toward the 25,000 unit goal prior to FY2000.	CHA will rehabilitate 218 public housing units and preserve 125 PBV units through Mod Rehab conversions in FY2016 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

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

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

- **Implementation Year:** FY2010 (expansion of this activity approved in FY2014)
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Status Update:** In FY2014, CHA utilized the alternative cost formula to close and start construction at Legends C3, Parkside IIB, Casa Queretaro, and Rosenwald Courts which will deliver a total of 141 public housing units in FY2015 - FY2016. To date in FY2015, CHA has utilized the alternative cost formula to close and start construction at Sterling Park which will deliver a total of 66 public housing units in FY 2016. In the second half of FY2015, CHA plans to utilize the alternative cost formula to close and start construction at two sites which will deliver a total of 44 public housing units in FY2016. In FY2016, CHA plans to utilize the alternative cost formula at four additional sites to be under construction with a total of 235 public housing units.

In FY2016, CHA will utilize the alternative cost formula for rehabilitation of 226 units across two scattered site properties (8 units) and Altgeld Gardens Blocks 7 & 8 (218 units).

- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2016 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.	57 additional public housing units are planned for delivery and 69 additional public housing units are planned to be under construction in FY2016 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).	Eight housing units preserved through use of the alternate TDC formula.	226 housing units are expected to be preserved in FY2016 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 FY2016, the average wait time for 11,217 applicants on the Public Housing Family Wait List will remain stable at 54 months.

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HC-4: Displacement Prevention	Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	Zero households lost assistance or had to move prior to use of the alternate TDC formula.	Zero households will lose assistance or have to move in FY2016 through use of the alternate TDC formula.
CE-1: Agency Cost Savings	Total cost of task (in dollars).	CHA spent zero dollars through use of the alternate TDC formula prior to implementation.	In FY2016, CHA will use the MTW alternative TDC formula to deliver 57 additional public housing units at a cost of \$16,717,508 and place 69 additional public housing units under construction at a cost of \$23,905,692.  In FY2016, CHA estimates a cost of \$62,769,335 for rehabilitation projects using the alternate TDC formula.

Units Planned for FY2016 Delivery that will use MTW TDC	Public housing units without MTW TDC	Additional public housing units with MTW TDC	Total Public Housing Units
Casa Queretaro	11	4	15
Rosenwald	34	26	60
Sterling	50	16	66
City Gardens	16	9	25
St. Edmund's Oasis	17	2	19
Total Units	128	57	185

Additional Developments Planned to be Under Construction in FY2016 using MTW TDC	Public housing units without MTW TDC	Additional public housing units with MTW TDC	Total Public Housing Units
Park Blvd. IIIA For Sale	12	0	12
Clybourn and Division	21	5	26
Lathrop Phase 1	120	60	180
45th and Cottage Grove	13	4	17
Total Units	166	69	235

- **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.

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- **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. 905.314 (now 24 C.F.R 905.314). This allows CHA to establish an alternative reasonable cost formula reflecting CHA's actual costs experienced for construction activity in the local market as the cost control measure for quality construction work.

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

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

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

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

- **Implementation Year:** FY2015
- **Statutory Objectives:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Status Update:** CHA will implement this activity in FY2015 and implementation will be ongoing in FY2016.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2016 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.	5 additional public housing units will be made available as a result of this activity in FY2016.
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 FY2016, the average wait time for 11,217 applicants on the Public Housing Family Wait List will remain stable at 54 months.

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HC-5: Increase in Resident Mobility	Number of households able to move to a better unit and/or neighborhood of opportunity as a result of CHA expedited acquisition process.	0 households were able to move to a better unit and/or neighborhood of opportunity prior to FY2015 as a result of CHA expedited acquisition process.	5 households will be able to move to a better unit and/or neighborhood of as a result of this activity.
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- **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 2015, the minimum rent population (those paying \$75 per month) includes 7,754 HCV households. In addition, there are 346 HCV households (5%) in the hardship population, meaning they are paying less than \$75 per month.
  - **Public Housing:** As of June 2015, the minimum rent population includes 1,680 Public Housing households. 167 (10%) Public Housing households from the total minimum rent population, have a hardship and are paying less than \$75.

• **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2016 Benchmark
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CE-5: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<p><u>HCV:</u> In FY2008, 5,010 residents were expected to pay \$50 minimum rent for a total annual contribution of \$3,006,000.</p> <p><u>Public housing:</u> In FY2008, 1,524 residents were expected to pay \$50 minimum rent for a total annual contribution of \$914,400.</p>	<p><u>HCV:</u> In FY2016, CHA estimates 7,800 residents will be paying \$75 minimum rent for a total annual contribution of \$7,020,000.</p> <p><u>Public housing:</u> In FY2016, CHA estimates 1,770 residents will be paying \$75 minimum rent for a total annual contribution of \$1,593,000.</p>
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- 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: New income eligibility requirements went into effect on January 1, 2015. CHA has implemented a higher minimum income requirement for eligibility for the Choose to Own Homeownership Program from the current minimum income of \$14,500 to the eligibility requirement of 50% or more of the Area Median Income (AMI). It does not apply to those currently in the program preparing to purchase a home. This change also does not apply to those who are elderly or disabled who enroll in the program. In FY2011, CHA expanded the Choose to Own (CTO) Home Ownership Program beyond HCV participants to current CHA public housing residents. Since 2011, 21 public housing residents have purchased a home through CTO. Pre- and post-home ownership education and counseling requirements are an integral component to remain an eligible participant.

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

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

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Standard Metric	Unit of Measurement	Baseline	FY2016 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 FY2016, 25 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 FY2016, 30 families (25 HCV and 5 public housing) 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 FY2016, 30 families (25 HCV and 5 public housing) 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.

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

- **Description and Impact:** In FY2014, CHA received approval to revise the participation requirements for the Family Self-Sufficiency program for public housing and HCV participants in the following ways:
  - Provide FSS participants with the ability to opt out of the Earned-Income Disregard so that they begin earning escrow more quickly.
  - Terminate participants from the FSS program who are not engaged with the program to open slots for those who are more interested in taking advantage of it. (This will not affect their housing subsidy.) Engagement will be defined as having at least one face-to-face meeting with an FSS coordinator each year.
  - Create more stringent education requirements for program participants, including attending three financial literacy sessions each year.
  - Require participants to be continuously employed for at least 12 months prior to program completion.

These revisions will remedy several current issues, including existing disincentives to participation due to a short period of time in which to earn escrow, underutilization of the program by participants who are not fully interested in engaging, and lack of financial self-sufficiency of current graduates. The overall goal is to maximize engagement in the FSS program and maximize the benefits of participation for those enrolled in the program. The impact of this activity is that more participants will remain engaged, obtain escrow, and increase consistent employment so they are better prepared for economic self-sufficiency upon graduation.

- **Implementation Year:** FY2014

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- **Statutory Objective:** MTW Statutory Objective II: Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
- **Status Update:** The new FSS program policies will take effect immediately for new enrollees and optionally for current participants when the FSS Action Plan reflecting these changes is approved by HUD. New program requirements will be in place for enrollees in FY2016.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2016 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 FY2016, 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 FY2016, 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 FY2016, 368 FSS participants will have income from wages.
		In FY2013, 46% of FSS participants had income from wages.	The percent of FSS participants with income from wages will remain stable at 46% in FY2016.
SS-4: Households Removed from TANF	Number of households receiving TANF assistance (decrease).	In FY2013, 133 FSS participants were receiving TANF.	In FY2016, 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.	900 total FSS participants (including 250 new FSS participants) will be enrolled in FY2016.
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 \$7,400 (based on 17,631 eligible units) in FY2016.
		<u>HCV:</u> In FY2013, the average subsidy per HCV household was	<u>HCV:</u> The average subsidy per HCV household is projected to be \$9,756

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		\$8,922 (based on 36,679 eligible vouchers).	(based on 45,977 HAP vouchers) in FY2106.
SS-7: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<p><b>Public Housing:</b> In FY2013, public housing FSS participants contributed a total of \$1,006,056 (237 households).</p> <p><b>HCV:</b> In FY2013, HCV FSS participants contributed a total of \$1,831,476 (505 households).</p>	<p><b>Public Housing:</b> In FY2016, the total contribution of public housing FSS participants will remain stable at \$1,235,000 (300 households).</p> <p><b>HCV:</b> In FY2016, the total contribution of HCV FSS participants will remain stable at \$2,198,000 (550 households).</p>
SS-8: Households Transitioned to Self-Sufficiency	Number of households transitioned to self-sufficiency (increase).	In FY2012, 109 participants graduated from the FSS program.	150 participants (90% of eligible FSS participants) will graduate from the program in FY2016.
<p>*For SS-3 tracking, 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 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.

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

- **Description and Impact:** CHA proposes to implement a streamlined triennial re-examination schedule for public housing and HCV fixed income households consisting of only elderly and/or disabled participants. Given the infrequency of income changes for these households, the impact of this activity is decreased staff time and resources currently utilized for conducting re-examinations for this population. In addition, this activity will decrease the re-examination burden for fixed income elderly/disabled households.
- **Implementation Year:** FY2015 (HCV and Public Housing)
- **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 will continue processing already scheduled HCV biennial re-examinations and will assign a new date based on a triennial schedule (FY2019).

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- **Public Housing:** CHA implemented triennial re-examinations for public housing in FY2015. CHA placed those admitted in odd admission years on the triennial schedule in FY2015. Residents who were admitted in even admission years will be reexamined again in FY2016 and then placed on the triennial re-examination schedule. All eligible residents will be placed on the triennial re-examination schedule by the end of FY2016.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline <sup>^</sup>	FY 2016 Benchmark
CE-1: Agency Cost Savings	Total cost of task (in dollars).	<p><b>HCV:</b> In FY2013, based on the existing biennial schedule, CHA spent \$269,325 on re-exams for eligible fixed-income elderly/ disabled households (3,591 x \$75).</p> <p><b>Public Housing:</b> In FY2013, CHA spent \$367,800 on annual re-exams for fixed-income elderly/disabled households (4,904 re-exams x \$75).</p>	<p><b>HCV:</b> In FY2016, based on the existing biennial schedule, CHA will spend approximately \$580,000 on re-exams for fixed-income elderly/disabled households (4,000 x \$145).</p> <p><b>Public Housing:</b> In FY2016, CHA will spend approximately \$710,500 on annual re-exams for fixed-income elderly/disabled households (4,900 re-exams x \$145).</p>
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	<p><b>HCV:</b> In FY2013, based on the existing biennial schedule, CHA spent 12,569 staff hours on re-exams for eligible fixed-income elderly/ disabled households (3,591 x 3.5 hours).</p> <p><b>Public Housing:</b> In FY2013, CHA spent 17,164 staff hours on annual re-exams for public housing fixed-income disabled/elderly households (4,904 re-exams x 3.5 hours).</p>	<p><b>HCV:</b> In FY2016, based on the existing biennial schedule, CHA will spend approximately 26,000 staff hours on annual re-exams for HCV fixed income disabled/elderly households (4,000 re-exams x 6.5 hours).</p> <p><b>Public Housing:</b> In FY2016, CHA will spend approximately 31,850 staff hours on annual re-exams for public housing fixed-income (4,900 re-exams x 6.5 hours).</p>
CE-5: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<p><b>HCV:</b> In FY2013, based on the existing biennial schedule, eligible fixed-income elderly/disabled households contributed a total of \$11,398,176 (3,591 households).</p> <p><b>Public Housing:</b> In FY2013, public housing fixed-income elderly/disabled households contributed a total of \$15,526,368 (4,904 households).</p>	<p><b>HCV:</b> In FY2016, based on the existing biennial schedule, eligible fixed-income elderly/disabled households will contribute a total of approximately \$12,648,000 (4,000 households).</p> <p><b>Public Housing:</b> In FY2016, public housing fixed-income elderly/disabled households will contribute a total of approximately \$15,500,000 (4,900 households).</p>
<p><sup>^</sup>CHA has updated the staff times for these activities from 3.5 hours to 6.5 hours. The cost per re-examination increased from \$75 to \$145.</p>			

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

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

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

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

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

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.

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Status Update: CHA received necessary approvals from HUD in FY2015. CHA began program implementation in FY2015, and enrollment will depend on partner agency referrals. There have been zero participants thus far. In FY2016, 15 applications for participation are expected.

• Standard Metrics:

Standard Metric	Unit of Measurement	Baseline	2016 Benchmark
CE-4: Increase in Resources Leveraged	Amount of funds leveraged in dollars (increase).	Zero funds were leveraged through the re-entry pilot program prior to implementation.	\$35,000 funds leveraged through the re-entry pilot program for services for 10 initial participants in FY2016 (pending implementation in FY2015).
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 FY2016.
SS-3: Increase in Positive Outcomes in Employment Status*	Other category defined as:  Having earned income.	In FY2013, 11,104 of 24,139 "work-able" PH and HCV heads of household had income from wages.	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 FY2016.
		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).	Zero program participants received services through the re-entry pilot program prior to implementation.	25 initial program participants will receive services through the re-entry pilot program in FY2016.
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>HCV:</u> In FY2013, the average subsidy per HCV household was \$8,922 (based on 36,679 eligible vouchers).	<u>Public Housing:</u> The average subsidy per public housing household is projected to be approximately \$7,400 (based on 17,631 eligible units) in FY2016.  <u>HCV:</u> The average subsidy per HCV household is projected to be \$9,756 (based on 45,977 HAP vouchers) in FY2106.
SS-7: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<u>PH:</u> In FY2013, PH households contributed a total of \$65,718,276 (17,942 households) at an	<u>PH:</u> The total contribution of public housing families with program participants will be consistent with CHA's average in FY2016.

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		average of \$3,663 per household per year.  <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 FY2016.
SS-8: Households Transitioned to Self-Sufficiency**	Number of households transitioned to self-sufficiency (increase).	Zero program participants transitioned from a conditional lease to join the household after four years prior to implementation.	Zero program participants will transition from a conditional lease to join the household in FY2016.
HC-5: Increase in Resident Mobility	Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	Zero program participants moved to CHA housing through the re-entry pilot program prior to implementation.	10 initial program participants will move to CHA housing through the re-entry pilot program in FY2016.

- 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 authorized to implement conditional program participation agreements and mandatory participation in services as a component of the program.

MTW Activities Related to Public Housing

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

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

• Standard Metrics:

Standard Metric	Unit of Measurement	Baseline	FY2016 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.	275 residents engaged through the Office of the Ombudsman in FY2016.

• Additional Metrics:

Additional Metric	Unit of Measurement	Baseline	FY2016 Benchmark
Regional meetings to engage residents	Number of meetings held	0 meetings held before the creation of the Office of the Ombudsman.	Minimum of four meetings for mixed-income residents in FY2016.

- 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.

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

- Description and Impact: CHA plans to implement biennial re-examinations for public housing residents to review family circumstances, income, assets, expenses, and family composition to establish continued eligibility for public housing. The impact of this activity is a decrease in staff time and resources for conducting re-examinations for applicable families. In addition, this activity decreases the re-examination burden for participants who undergo re-examinations on a biennial basis instead of an annual basis. Biennial re-examinations will be applicable for those public housing residents who are not on annual or triennial re-examination schedules.<sup>3</sup>
- Implementation Year: FY2015
- Statutory Objective: MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- Status Update: CHA implemented biennial reexaminations for public housing in FY2015. Residents who were admitted in even admission years will be reexamined again in FY2016 and then placed on the biennial re-examination schedule. All eligible residents will be placed on the biennial re-examination schedule by the end of FY2016.
- Standard Metrics:

Standard Metric	Unit of Measurement	Baseline <sup>^</sup>	FY2016 Benchmark
CE-1: Agency Cost Savings	Total cost of task (in dollars).	In FY2013, annual re-exams for PH households eligible for biennial re-	In FY2016, annual re-exams for PH households eligible for biennial re-

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

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		exams cost \$960,075 (12,801 re-exams x \$75).	exams will cost approximately \$1,850,000 (12,800 re-exams x \$145).
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	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).	In FY2016, CHA will spend 83,000 staff hours on annual re-exams for PH households eligible for biennial re-exams (12,800 re-exams x 6.5 hours).
CE-5: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	In FY2013, public housing households eligible for biennial re-exams contributed a total of \$49,185,852 (12,801 households).	In FY2016, PH households eligible for biennial re-exams will contribute a total of \$49,000,000 (12,800 households).
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 public housing households eligible for biennial re-exams was \$5,564. (12,801 households).	In FY2016, the average income from wages for 12,800 PH households who are eligible for biennial re-exams, is expected to be \$5,500.
SS-3: Increase in Positive Outcomes in Employment Status*	Other category: Having earned income.	In FY2013, 2,976 “workable” public housing heads of household eligible for biennial re-exams had income from wages.  In FY2013, 59% of “workable” public housing heads of household eligible for biennial re-exams had income from wages.	In FY2016, 3,000 “workable” public housing heads of household eligible for biennial re-exams are expected to have income from wages.  In FY2016, 59% of “workable” public housing heads of household eligible for biennial re-exams are expected to have income from wages.
SS-4: Households Removed from Temporary Assistance for Needy Families (TANF)	Number of households receiving TANF assistance (decrease).	In FY2013, 6,319 public housing households (out of 12,801) eligible for biennial re-exams were receiving TANF.	In FY2016, the number of public housing households eligible for biennial re-examinations who receive TANF will remain stable at 6,300.
SS-8: Households Transitioned to Self-Sufficiency**	Number of households transitioned to self-sufficiency (increase).	In FY2013, 1,029 public housing households (out of 12,801) eligible for biennial re-exams moved up at least one AMI category.	In FY2016, 1,000 Public Housing households (out of 12,800) eligible for biennial re-exams are expected to move up at least one AMI category.
<p>^ CHA has updated the staff times for these activities from 3.5 hours to 6.5 hours. The cost per re-examination increased from \$75 to \$145.                      *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</p>			

least one employed household member) and Crisis (0-50% AMI with zero employed work-able adults in household).

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

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

- **Authorization:** For 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 HCV Program

***Biennial Re-examinations for HCV (2006-01)***

- **Description and Impact:** 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>4</sup>
- **Implementation Year:** FY2006 (HCV)
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:** Biennial re-examinations will continue to result in staff time savings in the re-examination process. CHA conducted a new time study and cost analysis for re-examinations in June 2014 to improve the tracking for this activity. (See *Data Collection*.)
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline <sup>^</sup>	FY2016 Benchmark
CE-1: Agency Cost Savings	Total cost of task (in dollars).	In FY2013, HCV households who had re-exams, based on a biennial schedule, (14,105 households, or half of the total 28,209 biennial-eligible households) cost approximately \$1,057,875. (14,105 re-exams x \$75).	In FY2016, annual re-exams for applicable HCV participants will cost approximately \$2,247,500 (15,500 re-exams x \$145).

<sup>4</sup> CHA conducts annual re-examinations for public housing and HCV households participating in the FSS and Choose to Own programs and households in Moderate Rehab properties. CHA is planning to implement triennial re-examinations for fixed-income households with only elderly and/or disabled participants.

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CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	In FY2013, for HCV households who had re-exams, based on a biennial schedule (14,105 households, or half of the total 28,209 biennial-eligible households), CHA spent 49,368 staff hours (14,105 re-exams x 3.5 hours).	In FY2016, CHA will spend 100,750 staff hours on annual re-exams for applicable HCV participants (15,500 re-exams x 6.5 hours).
CE-5: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	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).	In FY2016, HCV households who are due for re-exams, based on a biennial schedule, will contribute a total of \$54,000,000 (15,200* households).
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 18,034 HCV households who had biennial re-exams was \$4,208.	In FY2016, the average income from wages for 15,200 HCV households who had biennial re-exams is expected to be \$5,000.
SS-3: Increase in Positive Outcomes in Employment Status**	Other category:  Having earned income.	In FY2013, 3,478 “work-able” HCV heads of household eligible for biennial re-examinations had income from wages.	In FY2016, 3,700 “work-able” HCV heads of household are expected to have income from wages.
		In FY2013, 45% of “work-able” HCV heads of household eligible for biennial re-examinations had income from wages in FY2013.	In FY2016, 48% of “work-able” HCV heads of household eligible for biennial re-exams are expected to have income from wages.
SS-4: Households Removed from Temporary Assistance for Needy Families (TANF)	Number of households receiving TANF assistance (decrease).	In FY2013, 1,538 HCV households (out of 18,034) who had biennial re-examinations were receiving TANF.	In FY2016, the number of HCV households eligible for biennial re-examinations who receive TANF will remain stable at 1,500.
SS-8: Households Transitioned to Self-Sufficiency***	Number of households transitioned to self-sufficiency (increase).	In FY2013, 1,374 HCV households (out of 18,034) who had biennial re-examinations moved up at least one AMI category.	In FY2016, 2,200 HCV households (of 15,200 who have biennial re-exams) are expected to move up at least one AMI category.
<p>^ CHA has updated the staff times for these activities from 3.5 hours to 6.5 hours. The cost per re-examination increased from \$75 to \$145.</p> <p>*This number (15,200) will count only 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 FY2016, which will also include households who had biennial re-exams in FY2016 but as of 12/31/16 are no longer receiving HCV assistance.</p> <p>**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.</p> <p>***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>			

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

In FY2014, CHA conducted a new time study and cost analysis for re-examinations. The cost per re-examination increased from \$75 to \$145. The time to conduct a re-examination increased from 3.5 hours to 6.5 hours. The new HCV analyses include itemize 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.

**Exception Payment Standards (2010-02)**

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

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

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

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

- **Implementation Year:** FY2010
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Status Update:** In FY2016, CHA 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 are affected and most will be required to move. CHA’s Mobility Program will continue to provide mobility counseling to those affected by this transition and to all voucher holders to encourage residents to move to Opportunity Areas. CHA will continue to evaluate the implementation of exception payment standards in the future.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2016 Benchmark
HC-5: Increase in Resident Mobility	Number of households able to move to a better unit and/or neighborhood of opportunity as a	In FY2012, 37 households leased in Opportunity Areas with	In FY2016, 980 households will lease in Opportunity Areas with exception

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

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	result of the activity (increase).	exception payment standards.	payment standards, including new and existing leases.
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- **Data Collection:** CHA tracks the number of HCV participants living in CHA-designated Opportunity Areas with exception payment standards.
- **Authorization:** Attachment C, Section D(2)(a-c) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of Section 8(o)(1-3), 8(o)(7), and 8(o)(10) of the 1937 Act and 24 C.F.R. 982.308, 982.503, 982.507, 982.508, 982.518, and 982.451.

**Owner Excellence - Vacancy Payments (2011-03)**

- **Description and Impact:** As part of CHA's Owner Excellence Program, CHA is authorized to provide a modest vacancy payment to participating owners who re-lease a Unit Excellence Program [UEP] unit to another HCV participant. CHA will provide vacancy payments to eligible owners upon the execution of a new HAP contract for a re-leased UEP unit. One-hundred percent of the previous family's HAP amount will be paid to participating owners for the vacant period not to exceed 60 days. The unit shall be deemed vacant (A) commencing on the first day for which HAP is not paid for the unit following completion of a move out or termination of the lease, and (B) ending on the day preceding the first day for which HAP is paid for such unit based on the execution of a new HAP with CHA. The purpose of this activity is to provide incentives to retain high quality owners and units in the program, and to continue to provide viable housing options for families.
- **Implementation Year:** FY2012 (approved FY2011).
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low income families.
- **Status Update:** As of June 2015, CHA has issued a total of 47 vacancy payments for UEP units for a total cost of \$71,548. Based on historical average, CHA estimates the approval of 65 vacancy payments in FY2016. In FY2014, CHA began an evaluation of the OEP program and the evaluation is ongoing. CHA will continue to review vacancy payments data to evaluate and ensure the financial sustainability of this activity.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY 2016 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.	60 UEP units will be preserved through a vacancy payment in FY2016.

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

**MTW Activities Related to Property Rental Assistance Program/Project-Based Voucher Programs 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: Through the end of FY2016, CHA will use this flexibility in 23 PBV developments containing a total of 465 units. In FY2016, CHA anticipates using this flexibility for three additional family developments containing a total of 213 PBV units, of which 12 housing units will be preserved as a result of exceeding the 25% limit.
- Standard Metrics:

Standard Metric	Unit of Measurement	Baseline	FY2016 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 prior to FY2008.
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.	12 housing units for low-income households will be preserved by exceeding 25% in family PBV properties in FY2016.

- 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.

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

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

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- Status Update: In FY2016, CHA will spend \$768,285 on initial eligibility determinations and spend \$50,499 on re-examinations for PRA. CHA will spend 15,853 hours of staff time for PRA initial eligibility determinations and re-examinations for all PRA units.
- Standard Metrics:

Standard Metric	Unit of Measurement	Baseline <sup>^</sup>	FY2016 Benchmark
CE-1: Agency Cost Savings	Total cost of task in dollars (decrease).	In FY2012, CHA spent \$1,081,356 for PRA initial eligibility determinations and re-examinations prior to implementation (2,425 units x \$445.92).	<u>Initial Eligibility Determinations</u> : In FY2016, CHA will spend \$768,285 on initial eligibility determinations for PRA. This includes \$301,320 (810 new admission units X \$372) plus \$466,965 (810 new units x \$576.50 new admission fee).  <u>Re-examinations</u> : In FY2016, CHA will spend \$50,499 on re-examinations for PRA (1,629 re-examinations X \$31).
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	In FY2012, 8,488 hours of staff time were dedicated to PRA initial eligibility determinations and re-examinations prior to implementation (2,425 units x 3.5 hours).	In FY2016, CHA will spend 15,853 hours of staff time for PRA initial eligibility determinations and re-examinations for all PRA units (2,439 units x 6.5 hours). CHA will not save staff time through this activity.
<sup>^</sup> Since the baseline and benchmark was established, the per unit cost for initial eligibility determinations and re-examinations has decreased from \$445.92 to \$372. In addition, CHA has updated the staff time required for these activities from 3.5 to 6.5 hours.			

- Data Collection: CHA tracks the decrease in costs and staff time associated with allowing qualified owners to perform initial eligibility determinations and re-examinations. CHA estimates the cost of conducting PRA initial eligibility determinations is \$939.50, which includes a cost of \$372 yearly per unit for eligibility determinations, based on a \$31.00 monthly PUC, as well as a new unit admission fee of \$567.50. CHA currently estimates it takes 6.5 hours to conduct an initial eligibility determination or re-examination based on new time/cost analyses conducted in FY2014.
- Authorization: Attachment C, Section D (1)(a), (1)(c), and 3(b) of CHA's Amended and Restated MTW Agreement, which waive certain provisions of Sections of 8(o)(5) and 8(o)(7) of the 1937 Act and 24 C.F.R. 982.162, 24 C.F.R. 982.516, and 982 subpart E.

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

- **Description and Impact:** To facilitate the expansion of affordable housing opportunities through the use of project-based vouchers, CHA enters into new PRA Program project-based voucher HAP contracts for an initial term between one and 30 years. CHA utilizes MTW authority to enter into contracts that have an initial term of 16-30 years. CHA’s relevant contracts include a clause stating that the duration period is pursuant to CHA’s MTW authorizations. The impact of this activity is that it will assist developers to obtain better financial terms and help to ensure the long-term availability of quality affordable housing. Through this activity, contracts with an initial term of 16-30 years do not have the 15-year extension option.
- **Implementation Year:** FY2011
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low income families.
- **Status Update:** CHA is currently using this flexibility for 1,079 PBV housing units at 38 developments. In FY2016, CHA anticipates using this flexibility for an additional 146 units.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	FY2016 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 with 16-30 year contracts prior to implementation.	146 PBV units made available with 16-30 year contracts.
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 PBV units preserved with 16-30 year contracts prior to implementation.	0 PBV units preserved with 16-30 year contracts.

- **Data Collection:** CHA tracks the number of additional PBV units that are made available through executed HAP contracts with initial terms of 16 to 30 years.
- **Authorization:** Attachment C, Section D (2)(b) of CHA’s Amended and Restated MTW Agreement, which waives certain provisions of Section 8(o)(7) and 8(o)(13) of the 1937 Housing Act and 24 C.F.R. 983 Subpart E.

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

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

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- Status Update: In FY2016, CHA will spend \$19,275.75 on initial PRA inspections and 538 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^	FY2016 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 FY2016, CHA will spend \$19,276 on initial PRA inspections (585 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 FY2016, 538 hours of staff time will be dedicated to initial PRA inspections for new construction and substantial rehab units (585 units x .92 hours).
^Since the baseline was established, CHA has updated the cost of conducting initial PRA inspections to \$32.95 from \$14.40, and has also updated the estimated inspection time to .92 hours			

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

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

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

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

- Implementation Year: FY2012
- Statutory Objective: MTW Statutory Objective I: Increase housing choices for low income families.

Section IV: Approved MTW Activities: HUD Approval Previously Granted

- Status Update: In FY2016, CHA will spend approximately \$125,968 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 vacancy.
- Standard Metrics:

Standard Metric	Unit of Measurement	Baseline	FY2016 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.	350 PBV units made available through vacancy payments during initial leasing prior to the implementation of the activity.

- 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.

**Summary of Implemented MTW Activities**

<b>FY2016 Implemented MTW Activities</b> <b>Housing and Development</b>
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Section IV: Approved MTW Activities: HUD Approval Previously Granted

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	Alternate Reasonable Cost Formula for Redevelopment and Rehabilitation	HUD approved the reasonable cost formula for redevelopment in FY2010. CHA will utilize the reasonable cost formula for redevelopment, which was approved in FY2010, for both redevelopment and rehabilitation projects.	Increase Housing Options	Attachment C, Section C(16)
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	CHA received approval to revise the participation requirements for the Family Self-Sufficiency program for public housing and HCV participants	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 proposes to implement a streamlined triennial re-examination schedule for public housing and HCV fixed income households consisting of only elderly and/or disabled participants.	Reduce Costs and Cost Effectiveness	Attachment C, Section C (4) and Attachment C, Section D (1)(c)
2014-04	CHA Re-Entry Pilot Program	CHA received HUD approval to implement a Re-entry Pilot Program for up to 50 eligible participants in CHA traditional public housing or CHA's HCV Program.	Increase Housing Options	Attachment C, Section B(4)
<b>Public Housing</b>				
MTW Activity Number	Ongoing MTW Activity	Description	Statutory Objective	Authorization

Section IV: Approved MTW Activities: HUD Approval Previously Granted

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
2014-03	Biennial Re-examinations for Public Housing	CHA plans to implement biennial re-examinations for public housing residents to review family circumstances, income, assets, expenses, and family composition to establish continued eligibility for public housing.	Reduce Costs and Cost Effectiveness	Attachment C, Section C (4)
<b>HCV</b>				
<b>MTW Activity Number</b>	<b>Ongoing MTW Activity</b>	<b>Description</b>	<b>Statutory Objective</b>	<b>Authorization</b>
2006-01	Biennial Re-examinations for HCV	CHA currently conducts biennial re-examinations for HCV Program participants	Reduce Costs and Cost Effectiveness	Attachment C, Section D (1) (c)
2010-02	Exception Payment Standards	CHA is authorized to apply exception payment standards that may be up to 300% of HUD's published Fair Market Rents (FMRs) for the City of Chicago in order to increase housing options in opportunity areas throughout Chicago.	Increase Housing Options	Attachment C, Section D(2)
2011-03	Owner Excellence-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)
<b>PRA/PBV</b>				
<b>MTW Activity Number</b>	<b>Ongoing MTW Activity</b>	<b>Description</b>	<b>Statutory Objective</b>	<b>Authorization</b>
2008-02	Exceed the Limit of 25% Project-Based Voucher Assistance in Family Properties	CHA may increase the percent of assisted PBV units in certain projects above the regulatory limit of 25% per family building.	Increase Housing Options	Attachment D, Paragraph 6
2011-04	Authorization of Qualified PRA Owners/Property Managers to Perform Initial Eligibility Determinations and Reexaminations	CHA allows qualified owners, as defined by CHA, to perform initial eligibility determinations and re-examinations of participants in the PRA program.	Reduce Costs and Cost Effectiveness	Attachment C, Section D(1) and Section D(3)
<b>PRA/PBV</b>				

Section IV: Approved MTW Activities: HUD Approval Previously Granted

MTW Activity Number	Ongoing MTW Activity	Description	Statutory Objective	Authorization
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)
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

**Activities on Hold**

The following MTW activities are on hold for FY2016.

***Owner Excellence - Biennial Inspections (2014-03)***

- **Description and Impact:** As part of CHA's Owner Excellence Program, units with UEP designation will be inspected on a biennial basis. The impact of this activity is a reduction in staff hours spent on conducting inspections, which subsequently will result in administrative cost savings.
- **Implementation Year:** FY2012 (approved FY2011)
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:** CHA decided to place this activity on hold for FY2015 in anticipation of new regulations. CHA anticipates that the new regulations will take effect prior to FY2016 and will therefore keep this activity on hold.
- **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.

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

- **Description and Impact:** As part of the HCV Owner Excellence Program, and for units with a UEP designation only, CHA is authorized to approve tenancy for a unit that passed inspection within the previous 90 calendar days without conducting a new inspection for each Request for Tenancy Approval [RTA] received. The purpose of this activity is to provide incentives to retain high quality owners and units, to continue to provide viable housing options for HCV participants.
- **Implementation Year:** FY2012 (approved FY2011)
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low income families.
- **Status Update:** In response to the small number of units which have utilized this benefit, CHA has decided to place this activity on hold for FY2016.
- **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.

**Closed Out Activities**

The following MTW activity will be closed out in FY2016.

***Two-Year Requirement for PBV Participant Transition to Housing Choice Voucher (2011-07)***

- **Description and Impact:** Under the PRA program, CHA reduces the turnovers in project-based voucher developments by allowing families only to receive a Housing Choice Voucher after two years of occupancy rather than one year, except for tenants currently residing in a supportive housing unit. Supportive housing units are exempt from the two-year tenancy requirement in cases where families who graduate from their supportive services program(s) before two years wish to move to traditional family housing. In those cases, the family would be issued a tenant-based voucher and the unit would become available for another family in need of supportive services. The impact of this activity is reducing PBV unit turnover and providing stability as an incentive to developers and property owners to participate in the PRA program. Moreover, this also assists in reducing turnover costs in PBV developments.
- **Implementation Year:** FY2011
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:** In FY2016, CHA will close out this MTW activity and transition to the one year requirement per standard regulations.
- **Authorization:** Attachment C, Section D (7) of CHA's Amended and Restated MTW Agreement which waives certain provisions of 24 CFR 983.

# Section Five

## MTW Sources and Uses of Funds

## Section V: MTW Sources and Uses Funds

This section contains information on CHA's anticipated sources and uses of funding in FY2016.

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

#### Estimated Sources of MTW Funding for FY2016

The following table shows projected sources of MTW funding in FY2016.

Sources		
FDS Line Item	FDS Line Item Name	Dollar Amount
70500 (70300+70400)	Total Tenant Revenue	\$49,588,988
70600	HUD PHA Operating Grants	\$727,668,002
70610	Capital Grants	\$174,840,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	\$431,500
71100+72000	Interest Income	\$2,575,000
71600	Gain or Loss on Sale of Capital Assets	\$0
71200+71300+71310+71400+71500	Other Income	\$2,733,544
70000	Total Revenue	\$957,837,034

#### Explanations of CHA FY2016 MTW Sources:

- FY2016 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 FY2016 voucher counts. CHA continues to finalize MTW HCV leasing projections for FY2016.
- CHA anticipates utilizing reserves for capital expenditures. Those reserves are not reported as FDS line items and are not reflected as sources above.

#### Estimated Uses of MTW Funding for FY2016

The following table shows projected uses of MTW funding in FY2016.

Uses		
FDS Line Item	FDS Line Item Name	Dollar Amount
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	\$39,891,503
91300+91310+92000	Management Fee Expense	\$0
91810	Allocated Overhead	\$39,013,349
92500 (92100+92200+92300+92400)	Total Tenant Services	\$67,179,180
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	\$27,843,869
93500+93700	Labor	\$0
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	\$70,924,461
95000 (95100+95200+95300+95500)	Total Protective Services	\$27,063,656

96100 (96110+96120+96130+96140)	Total insurance Premiums	\$5,471,000
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	\$14,703,016
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	\$1,016,116
97100+97200	Total Extraordinary Maintenance	\$10,000,000
97300+97350	Housing Assistance Payments + HAP Portability-In	\$467,299,558
97400	Depreciation Expense	\$161,834,493
97500+97600+97700+97800	All Other Expenses	\$1,283,544
90000	Total Expenses	\$933,523,745

**Add back: Depreciation** **(\$161,834,493)**

**Deduct: Capital Expenditures** **\$295,613,405**

**Total Expenses** **\$1,067,302,657**

**Use of Reserves** **\$109,465,623**

#### Explanations of CHA FY2016 MTW Uses

- The estimated Housing Assistance Payments expense is based on 90% voucher utilization in FY2016. CHA continues to finalize MTW HCV leasing projections for FY2016.
- 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.
- Interest income is derived from Cash and Cash Equivalents and the Investments at Fair Value that are presented on the Statements of Net Position in CHA's 2015 Comprehensive Annual Financial Report.

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

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

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

The table below outlines CHA's use of the MTW single fund for FY2016, with projected expenditures by category based on CHA's FY2016 budget. (This includes projected reserve expenditures of \$106.5M, which are outlined at the end of this section.)

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

CHA uses capital dollars as well as Section 8 MTW Block Vouchers from the single fund to support ongoing revitalization activities, in an effort to further advance the progress of the original Plan and implement applicable new Plan Forward initiatives. Section II describes capital expenditures and specific development and capital activities planned for FY2016.

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

**THE CHICAGO HOUSING AUTHORITY  
USE of MTW SINGLE FUND  
FY2016 ANNUAL PLAN**

	<b>FY2016</b>
<b>CENTRAL OFFICE</b>	<b>\$ 44,566,652</b>
 <b><u>HOUSING</u></b>	
Housing Choice Voucher	483,182,960
Asset Mgmt	175,222,044
Resident Services	39,213,651
Housing Administration	474,297
<b>TOTAL HOUSING</b>	<b>698,092,952</b>
 <b><u>CAPITAL</u></b>	
Capital Repairs and Improvement	288,315,405
Capital Development	2,647,966
Capital Administration	2,907,957
<b>TOTAL CAPITAL</b>	<b>293,871,328</b>
 <b>DEBT SERVICE</b>	 <b>2,266,116</b>
 <b>TOTAL USES</b>	 <b>\$ 1,038,797,048</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 as part of Plan Forward. In accordance with the Relocation Rights Contract, CHA provides relocation notices to families impacted by building closures or consolidation and makes move-related payments. Additionally, residents are offered pre-move counseling, HCV mobility counseling, post-move counseling, unit tours, assistance in accessing other necessary services and support for residents in managing their household and adjusting to new communities. CHA also provides packing materials and moving assistance to families who are relocating.

Support Services for Families

CHA currently offers public housing families living in CHA properties or temporarily utilizing a Housing Choice Voucher a variety of case management and workforce development services, as well as select services to other HCV residents. These services focus on four main goals, each with measurable outcomes, including permanent housing choices, lease compliance, and employment preparation, placement and retention. A summary of the services planned for 2016 is below.

*Increasing Economic Independence:*

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

*Projected FY2016 Outcomes:*

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

*Increasing Earning Power:*

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

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

*Projected FY2016 Outcomes:*

- 2,000 residents will be connected to new or 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 FY2016 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 FY2016 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 5%.
- Regional senior music fests and the Senior Holiday Luncheon will engage more than 2,000 seniors.

**CHA Reserves**

Total reserve fund usage budgeted for FY2016 is \$106.5M.

- Reserve funds will be used for repair and maintenance at senior housing properties, scattered site properties and family properties.

- Reserve funds will also be used to develop mixed-income projects.
- Reserve funds will also be used for future capital projects.

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

Local Asset Management Plan	
Has the PHA allocated costs within statute during the plan year?	No
Has the PHA implemented a local asset management plan (LAMP)?	Yes
<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
<div style="border: 1px solid black; padding: 10px;"> <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 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.</p> </div>	



# Section Six

## Administrative

## **Section VI: Administrative**

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

### ***Board Resolution***



September 9, 2015

**Item No. 3**

### **RECOMMENDATION TO APPROVE CHA'S PROPOSED FY2016 MOVING TO WORK ANNUAL PLAN**

**To the Honorable Board of Commissioners:**

#### **RECOMMENDATION**

It is recommended that the Board of Commissioners approve the attached FY2016 Moving to Work (MTW) Annual Plan and grant authorization to submit the document to the United States Department of Housing and Urban Development (HUD) for approval.

The Chief of Staff, MTW Policy and Reporting Department and the Office of the General Counsel, have completed all necessary due diligence to support the submission of this initiative and recommend the approval of this item accordingly.

#### **CORPORATE GOAL**

Submission of the Proposed FY2016 MTW Annual Plan fulfills CHA's annual reporting requirements and supports CHA's goal of continued successful compliance with the obligations of HUD's Moving to Work Demonstration Program. The Proposed FY2016 MTW Annual Plan supports the implementation of Plan Forward initiatives and CHA's ongoing efforts to pursue the three statutory objectives of the MTW Demonstration Program.

**FUNDING:** Not applicable.

#### **GENERAL BACKGROUND**

CHA and HUD signed the original Moving to Work (MTW) Agreement on February 6, 2000 which allowed CHA to implement the original Plan for Transformation. CHA's Amended and Restated MTW Agreement with HUD was fully executed on June 26, 2008 which extended CHA's participation in the MTW Demonstration Program through FY2018.

In April 2013, 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 current and future work. 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 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. In May 2013, HUD issued a revised Form 50900 (Attachment B to the Amended and Restated 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 to ensure compliance with the new Form 50900.

Prior to submission of the Proposed FY2016 MTW Annual Plan to the Board, a 30-day public comment period was conducted from July 22 through August 21, 2015. Announcements for the public comment process appeared on CHA's website and in the Chicago Defender (July 22 and July 29) and Chicago Sun-Times and Hoy newspapers (July 22- 24 and July 27-28). CHA also distributed resident notices across public housing properties and sent an email notification to HCV participants.

During the public comment period, both residents and the public alike were able to submit comments orally and in writing, regarding the information contained in the Proposed FY2016 MTW Annual Plan. CHA held three public hearings during the comment period, on July 29, August 5, and August 6, 2015. Prior to finalizing the Proposed FY2016 MTW Annual Plan, CHA gave consideration to comments received during the public comment period.

CHA has complied with the requirements of the Amended and Restated MTW Agreement and HUD regulations regarding annual plans and amendments. The deadline for submitting the Proposed FY2016 MTW Annual Plan to HUD is October 16, 2015.

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

The Chief of Staff concurs with the recommendation to approve the Proposed FY2016 MTW Annual Plan.

The CEO recommends the approval of the Proposed FY2016 MTW Annual Plan and submission to HUD by the deadline of October 16, 2015.

Based upon the foregoing, it is recommended that the Board approve the Proposed FY2016 MTW Annual Plan and grant authorization to the Chief Executive Officer, the Board Chairperson, or their designee to approve any final updates as deemed necessary to submit the Proposed FY2016 MTW Annual Plan to HUD for approval by the deadline of October 16, 2015.

**RESOLUTION NO. 2015-CHA-82**

**WHEREAS**, the Board of Commissioners has reviewed the Board Letter dated September 9, 2015 requesting approval of the Proposed FY2016 MTW Annual Plan, attached hereto;

**THEREFORE BE IT RESOLVED BY CHICAGO HOUSING AUTHORITY**

**THAT** the Board of Commissioners hereby approves the FY2016 MTW Annual Plan, and the form, *Certifications of Compliance with Regulations* from Attachment B to the Amended and Restated MTW Agreement.

**THAT** the Board of Commissioners (“Board”) authorizes the Chief Executive Officer or his designee to approve any final changes to the Proposed FY2016 MTW Annual Plan. Such approval shall constitute conclusive evidence of the Board’s approval of any and all such changes.

**THAT** this approval of the Proposed FY2016 MTW Annual Plan supersedes any and all conflicting language found in prior CHA MTW Annual Plans.

**THAT** the Board of Commissioners hereby grants authorization to submit the Proposed FY2016 MTW Annual Plan to the U.S. Department of Housing and Urban Development by the deadline of October 16, 2015.



Chicago Housing Authority  
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Chicago, IL 60605  
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**Annual MTW Plan Certifications of Compliance**

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

<b>Form 50900: Elements for the Annual MTW Plan and Annual MTW Report</b>	
<b>Attachment B</b>	
<b>Certifications of Compliance</b>	
<b>Annual Moving to Work Plan                  Certifications of Compliance</b>	<b>U.S. Department of Housing and Urban Development                  Office of Public and Indian Housing</b>
<b>Certifications of Compliance with Regulations:                  Board Resolution to Accompany the Annual Moving to Work Plan*</b>	
<p>Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning <u>FY2016</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>	

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

IL002  
 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)

Rodrigue A. Sierra  
 Name of Authorized Official

Vice Chairman  
 Title

[Signature]  
 Signature

9/15/15  
 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 FY2016 MTW Annual Plan for CHA Board approval, a 30-day public comment period was conducted from July 22 through August 21, 2015. CHA held three public hearings during the comment period, on July 29 (Mabel Manning Library, 6 S. Hoyne St), August 5 (18<sup>th</sup> District Police Station, 1160 N. Larrabee St) and August 6 (Las Americas Senior Building, 1611 S. Racine St). A total of 85 people participated in these hearings. The following table includes public comments and CHA responses.

FY2016 MTW Annual Plan Public Comment Period: July 22 - August 21, 2015			
Comment #	Individual/Organization	Comment	CHA Response
1	Anonymous	<p>Mary Hartwell Catherwood apartments need improvements. The front of the application is fake fog. The model apartment that is shown makes you think your apartment will appear the same, but that's false too.</p> <ol style="list-style-type: none"> <li>1. Vents are carrying uncomfortable {fumes} in the bathrooms, which makes you sick.</li> <li>2. The tile on the floor need to be treated. When water drops on the floor, spots are left.</li> <li>3. Sometimes seniors are afraid to ask questions.</li> <li>4. Tenant patrol: one resident has control, and threatening others seniors at 3930 N Clark, and management allows this behavior.</li> <li>5. Inferior materials are put in apartments.</li> <li>6. Materials around baseboards are cracked, and staples are left hanging out.</li> <li>7. The doors look like they are from a mental hospital. They are hard to open and close.</li> <li>8. Not all, but some of the management is very unprofessional.</li> </ol>	<p>Thank you for your comments. CHA's objective is to provide safe, decent and affordable housing. The model units are established to demonstrate these attributes. Each unit in the building follows the same floor plan and has the same amenities. All floor tile installed in the units are waxed to prevent stains. Furthermore, all materials found in our units meet industry standards. Your concerns about the Tenant Patrol program have been shared with the property management company for their investigation and resolution. Residents who feel that customer service is lacking and would like to make a specific complaint are encouraged to contact CHA directly.</p>
2	Anonymous 1-4945 Sheridan Rd	<p>I'm very thankful to your office for your concern to share some ideas and comments for your proposed moving to work plan for 2016. Being a resident of this building, I don't know the name of the building manager. For the reason that he is very seldom in the building and per our observation, he is not responsive, cooperative, or helpful to the needs and problems of the residents. ...sometimes not dealing cooperatively when somebody approach them, especially the seniors that cannot speak English. I hope that for your proposed 2016 MTW Plan you will consider our ideas for change. Will it be better to assign your office one coordinator for the well-being of the residents who can understand the needs and problems of the residents as for our maintenance? I request that your office transfer Kurtis to another senior house because even he is off duty and request help when he's there. Hoping that you will appreciate my comment. Sorry for not giving my identity.</p>	<p>Thank you for your comment. CHA takes your concerns very seriously. They have been shared with your property management company for resolution. They have also been reminded of their contractual obligation to manage the building's daily operations effectively along with providing courteous and professional customer service to all residents. CHA will continue to monitor their performance to ensure that these goals are met.</p>

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3	Anonymous 2-4945 Sheridan Rd	<p>This is regarding comments of seniors at Habitat Castleman Apts. When it comes to management especially, ____ does not accomplish what managers should have been doing in regards to work given to him or her. Until now, the manager assigned to this building Habitat Co. We do not know him specifically, seldom does he come in and he doesn't give any acknowledgement whoever greets him. When ____ assign who knows the job of a manager.</p> <p>When it comes to the social worker assigned for food distribution it depends on who you know. Fair distribution of food boxes and lineagency must be observed. When it comes to make-over of each unit, they are not subscriber, although maintenance guys sympathize with seniors, even work during their off hours without work order if their subordinates tried to help.</p> <p>Management should pay attention to every floor. What should be inspected, especially old rotted parts in the units in each floor. When comes to sanitation for the sake of the residents, they never change filters of the air conditioners and freons for additional cooling purposes. Dripping faucets in bathrooms because gaskets need to be replaced.</p> <p>Change to energy saving bulbs in every unit, which saves on energy consumption. Seniors cannot afford to pay bills. The outside of the building and the surrounding building looks nice, but fake inside view. They are not aware of who is smoking inside.</p>	<p>Thank you for your comment. CHA takes your concerns very seriously. They have been shared with your property management company for resolution. They have also been reminded of their contractual obligation to manage the building's daily operations effectively along with providing courteous and professional customer service to all residents. CHA will continue to monitor their performance to ensure that these goals are met.</p> <p>The Commodity Box program is a monthly program offered by Catholic Charities of Chicago and is administered in accordance with the program rules. There is a maximum number of boxes allocated to each participating CHA senior building. Residents must complete an application providing documentation of age, income and residency to be eligible for the program. Eligible applications are accepted on a first come-first served basis until the maximum number (of boxes) is reached. Once the program is fully subscribed, additional residents interested in joining the program are assigned to a wait list held by the site/RSC. The wait list is maintained in the order applications are received. The individuals on the waiting list will complete an application in the event that they are going to receive food, to assure that application information is current. The program rules state that participants will be removed from the program for failure to pick up boxes for two or more months or for inappropriate behavior toward staff or other participants.</p>

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4	Anonymous 3-4945 Sheridan Rd	We are very glad that we are included in the 2016 work plan staying in the Chicago Housing to give some ideas and comments. As of now, I don't the name of our building manager for the reason that we don't see him and he never participates in the building meetings, and he never communicates with the tenants. As for his subordinate or assistant she is not approachable and never deal with the problems of the tenant. The maintenance staff are not doing their jobs, such as the cleanliness of the building. We request that Kartes remain because even when he's off duty and tenants ask for help he is very cooperative and very willing to help.Regarding our tenant patrol, they are not understanding non-English speaking tenants. Tenant patrol should be abolished. It's good if you maintain the security guard.Currently, the system in our building is that who you know, not what you know, for instance, the distribution of the food pantry. Some people, especially the Korean people are benefiting from the pantry. The rule is if we are going to be out, that we write our apartment numbers on the pantry, but this system is not practiced. I think if the Plan doesn't change in 2016 the problem will worsen. We hope that corporate office will look out for the well-being of the tenants in the upcoming year. Please help us.	<p>Thank you for your comment. CHA takes your concerns very seriously. They have been shared with your property management company for resolution. They have also been reminded of their contractual obligation to manage the building's daily operations effectively along with providing courteous and professional customer service to all residents. CHA will continue to monitor their performance to ensure that these goals are met.</p> <p>The Commodity Box program is a monthly program offered by Catholic Charities of Chicago and is administered in accordance with the program rules. There is a maximum number of boxes allocated to each participating CHA senior building. Residents must complete an application providing documentation of age, income and residency to be eligible for the program. Eligible applications are accepted on a first come-first served basis until the maximum number (of boxes) is reached. Once the program is fully subscribed, additional residents interested in joining the program are assigned to a wait list held by the site/RSC. The wait list is maintained in the order applications are received. The individuals on the waiting list will complete an application in the event that they are going to receive food, to assure that application information is current. The program rules state that participants will be removed from the program for failure to pick up boxes for two or more months or for inappropriate behavior toward staff or other participants.</p>
5	Kermit Offutt	We as tenants should be able to pay our rent by way of debit card. It would be a nice up date.	Thank you for your comment. This process will require further

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			investigation in order to ascertain the feasibility of implementation.
6	Bonnie Gibson	At this point I have not reviewed this plan. I intend to review this plan to the best of my ability. Usually CHA's plans are quite lengthy and in my opinion take quite some time to digest and review. My first initial comment is based on the intent of the plan, which is to move residents to work. I can appreciate a plan that helps individuals contribute positively to the community and thereby providing further opportunities for the individual, themselves.	Thank you for your comment. To clarify, CHA participates in HUD's Moving to Work (MTW) Demonstration Program. The FY2016 MTW Annual Plan is the agency's annual plan, required by HUD. Part of the annual plan activities are intended to encourage residents to move toward self-sufficiency, and the purpose of the annual plan is to outline CHA's plans and initiatives for the upcoming year.
7	Bonnie Gibson	Gifts and Talents of Individual Participants however, I would like to see a plan that builds on the strengths of an individual(s). Some individuals may contribute better if given an opportunity to open a business (daycare, foodservice, artist, environmental specialist, et al.), whereas another may contribute more effectively being employed as a medical provider or in sales. I would hope a program such as this, (with all its good intentions and efforts) would not limit a person's gifts and talents and prohibit an individual from reaching their full potential. Allow the participants to have some ownership with the MTO process.	Thank you for your comment.
8	Bonnie Gibson	Housing Issues I believe a move to work program could be successful if there were fewer housing issues or a system to actively resolve issues (zero tolerance for housing issues): 1. Issues with CHA processes, (which may include understanding program requirements, opportunities, changes, etc.) 2. Owner and Tenant Issues (Lease, Maintenance, Security, Quiet Enjoyment, Discrimination) One benefit of being a CHA participant is the housing opportunity; however at times there can be a lot of issues that go along with having the benefit. These types of housing issues, I believe make it challenging for an individual to return to work effectively, whether with the CHA's MTW process or working toward personal self-sufficiency.	Thank you for your comment.
9	Bonnie Gibson	I also believe our community would be better if there were less overall housing issues. For example, our surrounding communities have less social issues and in my opinion I believe that is because of a certain level of housing standards in Owner and Tenant relations.	Thank you for your comment.

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		Please e-mail if you need clarity regarding these comments. Thank you for this opportunity to express this comment. I look forward to reviewing the MTW plan in detail.	
10	Maurice Scott	Why do the staff always ask tenants do we want to lose our apartment when they don't want to do what they are supposed to do or doing something wrong? How would they like it if we ask if they want to lose their job every week?	CHA strives to deliver excellent, respectful customer service. Residents who feel that customer service is lacking and would like to make a specific complaint are encouraged to contact CHA directly.
11	Susan Kimmons	Great job. I'm all for it Any and everything to help build our communities for upgrade. My most concern is for the homeless to get them off the street, a place of their own. I'm so thankful for my apartment I was bless with I'm grateful to be a part of this.	Thank you for your comment.
12	Darryl Robinson	This email is a request for more affordable housing in Chicago. I have a voucher and live on the east side of the city. I attend the workshops CHA has, and some of them are helpful but I would like to know when you will have a workshop/housing fair for affordable housing in the city. I understand that new housing is open on 35th and State. When I attend a workshop I want it to meet those needs. And if CHA could offer more computer lab time and space at their offices. Please send me a link to new housing on the Southside built with HUD funds. And will the rehabbed property on 47th and State be CHA? And what about the rehabbed property on 63rd and Cottage Grove will that be CHA property for voucher holders?	<p>CHA is aware of the need for more affordable housing in Chicago and is increasing the number of vouchers available to assist families on the waiting list. These vouchers can be used in any apartment in Chicago that passes CHA's inspection process; they are not limited to specific properties. CHA is unsure which specific properties you are referencing in your comment, however, in order to assist you in your housing search, please visit the following link on CHA's website, for a listing of available units: <a href="http://chicagoha.gosection8.com/">http://chicagoha.gosection8.com/</a></p> <p>CHA operates eight computer labs located in the following developments and community centers and are open to all residents: Altgeld Gardens-CYC 951 E. 132nd Place, Charles Hayes FIC -4859 S. Wabash Ave., Dearborn Homes-2910 S. Dearborn, Lake Parc Place-3983 S. Lake Park, Lawndale Gardens-2527 S. California Ave., Lowden Homes-200 W. 95th St., Major Adams Community Ctr-125 N. Hoyne Ave., Wentworth Gardens-3757 S. Wells St. Each lab has on-</p>

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			site staffing, technical support, available open lab time and coordinated programming for residents. Computer labs' hours of operation are Monday through Friday 10:00am - 7:00pm. Saturday hours of operation varies by location. A full schedule of programming and hours of operation are posted in each lab.
13	Leola Thompson	Nothing in budget to install exhaust ventilation in bathrooms and elevators here at MAHALIA JACKSON APMNTS. Health concerns at stake. Without ventilation in bathrooms and elevators, chance of MOLE . Overheard elevator repair techs on 41 side confirm existence of MOLE found on elevator shaft just before new elevator was installed. CHA NOT CONCERNED ABOUT TENANTS HEALTH. BEEN HERE 3 YRS AND FOR THREE YRS. A PROMISE FOR WINDOWS CLEANING. STILL WAITING.	CHA is very concerned about the overall health and safety of residents. CHA is aware of the need of ventilation for the elevators on both the 9141 and 9177 sides of Mahalia Jackson. Although the elevators were recently upgraded, the existing exhaust fans were covered as the property management company is currently acquiring proposals to have new fans installed. The apartments have vents in the bathrooms. The property management company is also in the process of acquiring proposals for window cleaning. There have also been no reports from the elevator servicing company about the detection of mold in the elevator shafts.
14	Robert Whitfield	<p>Good afternoon. These are comments on the draft FY 2016 CHA Moving to Work (MTW) Annual Plan. These comments relate to redevelopment (or the lack thereof) at LeClaire Courts.</p> <p>The draft CHA FY2016 Annual Plan does not appear to include any reference to planned or current redevelopment activity at the former site of LeClaire Courts (the CHA City State units), and LeClaire Courts Extension, the CHA public housing development. This is disturbing given the repeated, and as yet unfilled CHA promises concerning the redevelopment of the LeClaire site. The CHA FY2011 MTW Annual Plan states that a draft Request for Qualifications (RFQ) for a redevelopment team was completed, but was on hold pending further review and consideration. The CHA FY2012 MTW Annual Plan states (pages 18 and 19) that in FY 2012, CHA would select a community development team to plan and redevelop the LeClaire</p>	Thank you for your comment.

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		site.The CHA FY2013 MTW Annual Plan states (page 19) that solicitation for the redevelopment of the LeClaire site is planned in FY 2013.The CHA FY2014 MTW Annual Plan states (page 17) CHA completed a transportation study on the LeClaire property in FY 2013; and that CHA would incorporate that transportation study into an overall development zone planning design process to start in 2013 and conclude in 2014.	
15	Robert Whitfield	<p>The proposed CHA FY2015 MTW Annual Plan (page 23) states that in FY 2015 CHA plans to procure and select a developer for mixed-income housing on the LeClaire site. The CHA FY 2015 Plan also states that CHA will sell seven acres of the LeClaire City State land to the Academy for Global Citizenship to build an international charter school.</p> <p>It is disturbing that after years of broken promises by CHA regarding the LeClaire site, the draft CHA FY 2016 Annual Plan omits any reference to the future redevelopment of the LeClarire site. CHA should, at the very least, insert very specific language in the draft CHA Plan on the current status of the redevelopment of the LeClaire site. CHA should also convene regular meetings with former LeClaire residents so they are kept informed on the redevelopment of the LeClaire site. CHA should also explain in the draft Plan why the selling of a portion of the LeClaire site for a charter school will not lessen the amount of replacement housing for former LeClaire residents.</p>	
16	Robert Whitfield	<p>These comments are requesting CHA to provided greater access to the draft MTW Annual Plan by providing copies of the Notice and the draft Plan at several additional locations.</p> <p>The CHA Notice provides 8 locations where copies of the draft CHA FY 2016 Plan are available. CHA should, given the vast geographical area where CHA public housing is located, consider having copies of the Notice, and the draft FY 2016 MTW Annual Plan at there additional CHA locations; which are for the most part, in isolated and or far out areas of the City. Copies of the Notice and the draft CHA FY 2016 MTW Annual Plan should be available at the four CHA Scattered Sites Regional Offices; the CHA senior buildings at 3030 West 21st Street, 6400 North Sheridan, 1930 West Loyola, 5821 North Broadway, 9141-77 South Chicago, 5650 North Kenmore; and the CHA family sites at Trumbull Park and Altgeld</p>	CHA increased outreach efforts to notify residents about the public comment process for the FY2016 MTW Annual Plan. CHA distributed/mailed the notice to public housing households in addition to providing the information to property management to have available. CHA continues to consider and implement strategies to improve the public comment process.

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		Gardens. This would increase the opportunity for more CHA residents in various locations throughout the City to review and comment on the draft CHA FY 2016 MTW Annual Plan.	
17	Gabriela Roman, Executive Director, Spanish Coalition for Housing	On behalf of the Spanish Coalition for Housing (SCH) I am writing to you in regards to the Chicago Housing Authority's Draft FY2016 Moving to Work (MTW) Annual Plan. I would like to provide some helpful observations and feedback regarding this plan so that greater progress can be made in the Latino community's relationship with the CHA. As you well know, the Latino community of Chicago has a huge place within the city. Almost a full third of Chicago's population are Latino and make up about 23% of the total income eligible population for public housing and Housing Choice Vouchers. Nonetheless, Latinos have remained disproportionately represented in those programs, with only around 9% of those programs showing Latino enrollment.	Thank you for your comment.
18	Gabriela Roman, Executive Director, Spanish Coalition for Housing	I would like to congratulate the CHA on their very effective outreach strategy in regards to the CHA Waitlist Lottery in reaching all residents including Latinos. During November of 2014 SCH assisted these efforts, processing the highest amount of waitlist applications outside of the CHA themselves. We have personally seen the incredible level of interest our community has in your programming, and we hope to help you leverage that even further.	Thank you for your comment.
19	Gabriela Roman, Executive Director, Spanish Coalition for Housing	Although your support of Latino organizations during the Waitlist Lottery was effective in working to bridge the demographic gap, much ground needs to still be gained in providing truly equitable representation that is in accordance with the principles of affirmative fair housing. We are distressed to learn, however, that after September 2015, the CHA no longer has an active large contract with a Latino-serving organization to do outreach or offer community services. Many members of the Latino community have publically voiced the need for continued cooperation between the CHA and other Latino-focused agencies, and I am confident that your leadership will continue its support of the Latino community in some way, but I would like to provide our advice on what form that should take.	Thank you for your comment.

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20	Gabriela Roman, Executive Director, Spanish Coalition for Housing	<p>I don't feel the need to debate the merits of the closed contract, the agency that held it, or the work they provided. I will voice, though, that the Latino community needs a stronger voice. The CHA should seek Latino agencies that are able to provide the outreach and technical assistance necessary to meet your vast fair housing needs across the full Chicago region. Bilingual and culturally sensitive staff are necessary to pierce that language barrier that has played such a fearsome role in bringing your quality programs to those Spanish speakers who are most in need.</p> <p>Changes to the original RFP eliminated comprehensive technical assistance, focused more on marketing and were not in the best interest of the Latino community nor did it to meet the needs you know Latinos require. As the largest housing counseling agency in the State of Illinois, SCH offers comprehensive counseling solutions across the entire Chicago metro area through multi office locations that stretch from the northern confines of Humboldt Park, to the growing Latino communities in South Chicago. I welcome you to bring our organization to the table to provide advice and guidance as you explore your Latino strategies for 2016 and beyond.</p>	<p>CHA is committed to providing equal opportunity in its outreach practices and decisions and to this end, in the last year, CHA established the Office of Diversity. One of the functions of the Office of Diversity is to enhance CHA's outreach strategy. In April 2015, the Board approved the Language Access Policy to standardize services provided to Limited English Proficiency (LEP) individuals and leverage partnerships with Community Based Organizations (CBOs) and other sister agencies serving the LEP community. Finally, CHA thanks the Spanish Coalition for Housing for your commitment to the Latino community and your participation in CHA's Limited English Proficiency Resource Group, which includes 15 CBOs.</p>
21	Gabriela Roman, Executive Director, Spanish Coalition for Housing	<p>Although it has been a couple of years since SCH officially worked with CHA programs, we still maintain the infrastructure that helped thousands of families each year. Because of this institutional knowledge and the relationships that we built with the Latino community, many former clients still continue to come to SCH for assistance. We believe these programs are important and continue to offer:</p> <ul style="list-style-type: none"> <li>• Submittals to CHAC</li> <li>• Assistance with Port-in and Port-outs</li> <li>• Informal Reviews</li> <li>• Extension Requests</li> <li>• Intent to terminate</li> <li>• Assistance with On-site Re-certifications</li> <li>• Landlord Assistance/Pre-inspections</li> <li>• Mobility Counseling Lease-ups</li> <li>• FSS Outreach</li> <li>• Choose To Own</li> <li>• Waitlist Lottery Outreach and TA</li> </ul>	<p>Please see response to previous comment.</p>

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22	McCray, ABLA	<p>Suggestions for 60 years &amp; over</p> <ol style="list-style-type: none"> <li>1. Provide shopping bus every 2 weeks or bi-monthly for seniors and the disabled/handicapped.</li> <li>2. Distribute farmer market coupons to senior citizens.</li> <li>3. Provide Thanksgiving and Christmas baskets.</li> <li>4. Distribute literature from senior satellite centers.</li> <li>5. Officer tai-chi &amp; exercises.</li> <li>6. Provide monthly food boxes and conduct monthly well-being checks.</li> </ol>	<p>CHA appreciates these suggestions. CHA's Resident Service Coordinators (RSC) are available to assist senior residents with exploring and linking to community resources. Residents should contact their RSC to discuss specific needs such as this. We have asked the RSC in the FamilyWorks agency, Heartland Human Care Services to explore resources that may address these requests.</p>
23	Sylvia Puente, Executive Director Latino Policy Forum	<p>The Latino community makes up nearly a third of the City of Chicago population and comprises about 23 and 22 percent of the income eligible population for both Public Housing and the Housing Choice Voucher programs respectively. Yet, the Latino population participates at less than half the rate it could be - hovering at less than ten percent for Public Housing and about eight percent for Housing Choice Vouchers. Based on U.S. Census data more than half of Latino households in Chicago are renters and more than half of Latino renters are rent burden - that is paying more than 30 percent of their household income towards rent.</p>	<p>CHA is committed to providing equal opportunity in its outreach practices and decisions and to this end, in the last year, CHA established the Office of Diversity. One of the functions of the Office of Diversity is to enhance CHA's outreach strategy. In April 2015, the Board approved the Language Access Policy to standardize services provided to Limited English Proficiency (LEP) individuals and leverage partnerships with Community Based Organizations (CBOs) and other sister agencies serving the LEP community. Finally, CHA thanks the Spanish Coalition for Housing for your commitment to the Latino community and your participation in CHA's Limited English Proficiency Resource Group, which includes 15 CBOs.</p>
24	Sylvia Puente, Executive Director Latino Policy Forum	<p>It is the Forum's understanding that after September 2015, the CHA will no longer have a contract with a Latino-serving community based organization to do sufficient outreach and offer community services for the CHA in the Latino community. Due to the historically low Latino participation rates in CHA programs, the Forum strongly urges that the CHA release an RFP to continue community based work with a targeted Latino outreach strategy. For the past few years, the CHA has funded Latino-serving community based organizations to promote and provide direct services to Latinos in their preferred language. The Forum and its Acerbo recommend that the CHA continue to fund a Latino-serving organization so that it may fulfill its obligation to affirmatively</p>	<p>Please see response to previous comment.</p>

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		market to the Latino community at a rate that is equitable to the need. Continuation of this funding will ensure Latinos continue to access CHA housing programs and help current Latino CHA participants remain compliant and keep their housing subsidy.	
25	Sylvia Puente, Executive Director Latino Policy Forum	<p>Moreover, the CHA states in its proposed FY2016 MTW Annual Plan that the "CHA and its development partner plan to close a real estate transaction for the first phase of redevelopment at Lathrop Homes." However, according to the proposed plan, the CHA is only committed to delivering 400 units of replacement family public housing "through a combination of historically preserved housing, new housing, retail and other amenities in a mixed-income community." This plan does not account for the remaining 353 offline units. Moreover, it is not clear whether the 400 replacement units are in addition to the current 172 already occupied units, or inclusive of those units.</p> <p>The Forum and the Acuerdo ask that the CHA make a commitment to replace all 925 units at Lathrop Homes. Failure to do so will amount in a taxpayer-funded re-segregation of Chicago's North Side, to the detriment of Latino and African American families who need affordable housing in communities with thriving commercial districts, good schools, and other amenities. The CHA's current plan to devote 45 percent of Lathrop housing to market-rate housing is wasteful. Lathrop could be successfully revitalized as a combination of public and affordable housing. The CHA should replace all of the Lathrop public housing units on a one-to-one basis as quickly as possible at Lathrop, and/or in the increasingly more expensive neighborhoods surrounding Lathrop.</p>	Thank you for your comment. The revitalizing plan for Lathrop Homes contemplates the delivery of 1,116 total residential units on-site of which 400 are for public housing residents in a mixed-income, multi phased redevelopment model. Each phase is subject to available financing sources. CHA continues to search for housing opportunities in General/Opportunity Areas throughout the City.
26	Sylvia Puente, Executive Director Latino Policy Forum	<p>Additionally, the current plan for Lathrop Homes is one of mixed-income housing instead of all public housing. This and other CHA housing plans create the need to ask the following questions: To what extent are public dollars being used to promote and build mixed-income housing instead of public housing only? What is the total amount of public money being used to fund these types of mixed income housing projects at the CHA? The Forum and the Acuerdo request timely answers to these questions.</p>	Thank you for your comment. CHA funds are used to provide only public housing units in mixed income developments. Other public funds, including HOME, CDBG, and/or TIF funds, may be provided to fund the additional affordable housing units in mixed income developments. IHDA and the City of Chicago also allocate Low Income Housing Tax Credits to help generate private equity to fund affordable housing units

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27	Sylvia Puente, Executive Director Latino Policy Forum	In 2000, the CHA began its Plan for Transformation and promised to renovate or build 25,000 new public housing units in Chicago. However, 15 years later, according to the Chicago Housing Initiative's analysis, the CHA has only renovated or built 49% of its promised units, after accounting for demolition. This is unacceptable considering the city is currently experiencing a severe affordable housing shortage.	CHA continues to make progress toward and pursue new strategies to replace 25,000 housing units. CHA has completed more than 22,000 units (89%) as of the 2nd quarter of 2015 through family, senior and scattered site housing, mixed income housing and project-based vouchers.
28	Sylvia Puente, Executive Director Latino Policy Forum	What's more, since 2012, the CHA has not included demographic data on its programs' and wait lists' participants. The FY2013, FY2014, and FY2015, MTW Annual Plans all do not include demographic data on the CHA's clients. The Forum and the Acuerdo would like to know how the public can access this data if it is no longer provided in the annual reports.	The content and format of MTW annual plans/reports is based on HUD requirements, specifically outlined in Attachment B/Form 50900 of the MTW Agreement (available on CHA's website on the Plans/Reports/Polices page). Demographic information is now available in CHA's Quarterly Report, which was first released for Q3 2014. Quarterly reports are also available on CHA's website.
29	Sylvia Puente, Executive Director Latino Policy Forum	Finally, the CHA is required by federal law to affirmatively further fair housing. The demolition - or lack of new construction - of public housing units in Chicago will absolutely have a disparate impact on the city's ability to provide affordable housing to populations that have historically been underserved. Additionally, if the CHA no longer funds a Latino-serving community based organization to do Latino outreach, this will likely be a violation of the CHA's duty to affirmatively market to the Latino community. We recommend that the CHA to provide one-for-one replacement of public housing units in opportunity areas such as Lathrop Homes, LeClaire Courts, and Cabrini Row Houses, in order to facilitate integration and affirmatively further fair housing in the City of Chicago. These public housing developments, in particular, are especially prime opportunities for housing Latinos.	In accordance with Plan Forward goals, CHA is committed to coordinating public and private investments to develop healthy, vibrant mixed income communities. CHA is committed to satisfying the needs of families with a Right of Return and wait list applicants through a variety of unit delivery strategies.
30	Sylvia Puente, Executive Director Latino Policy Forum	In closing, we strongly urge the CHA to seriously consider the recommendations we have made today in going forward with its Moving to Work Annual Plan. The CHA's ability to create strong, vibrant communities is compromised when opportunities to build affordable housing are squandered and when there is no transparency in decision making. Furthermore, Latino access continues to be woefully underrepresented. We	Thank you for your comment.

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		encourage the CHA to continue to fund a Latino-serving organization in a Latino community.	
31	Robert Whitfield	CHA should ensure that the redevelopment process includes replacement housing opportunities for former LeClaire public housing residents, and replacement housing opportunities for former residents at the LeClaire City State property, per the attached 2009 CHA Board resolution. The 2009 resolution also amended the CHA Relocation Rights Contract per the attached addendum, in order to provide certain relocation rights for the former LeClaire City State residents.	CHA will continue to comply with the terms of the Relocation Rights Contracts and the RRC Addendum for replacement housing options for LeClaire Court Relocates.
32	Emily R. Brown   Staff Counsel BPI 25 E. Washington   Ste. 1515 Chicago, IL 60604 312.759.8264	1. Priorities: To meet its obligations under Gautreaux court orders CHA should focus its resources on two primary goals: (1) increasing the number of public housing units in Gautreaux General Areas and Opportunity Areas; and (2) completing mixed income developments (including their Gautreaux "remedial units") under the Plan for Transformation. CHA's projected unit delivery (1038 units identified on p. 7) reflects these priorities only in part. While the REAP and PBV programs can in principle be used to deliver General and Opportunity Area units, the plan does not specify how those programs will accomplish that. Of the Mixed-Income units identified, only the 25 City Gardens units are located in CHA redevelopment sites. CHA is also proposing 19 public housing units at St. Edmund's Oasis. Such units, to be located in the Washington Park community would violate the Gautreaux Court judgment order unless CHA provides 19 public housing "matching" units in a Gautreaux General Area.	Thank you for your comments. CHA is aware of its obligations via the Gautreaux orders and will continue to work through its Plan Forward process and negotiations with the Gautreaux representatives to proceed with development of housing throughout the city of Chicago.
33	Emily R. Brown BPI	2. REAP and PRA: To the extent that the proposed expedited acquisition process (page 39) may increase CHA's ability to develop such units, BPI strongly supports this activity. However, BPI is concerned that this process was proposed in the 2015 plan and apparently has still not been approved by HUD. We urge CHA to continue to explore ways to make the REAP and PRA programs more attractive to owners of properties in General and Opportunity Areas, especially in today's tight rental market. We also urge CHA to ensure that the steps taken to date (including those described in Section IV of the draft annual plan), particularly in the PRA program, are widely known to owners with units in the target areas.	Thank you for your comment. CHA received HUD approval of the FY2015 MTW Annual Plan, including the expedited acquisition process, on August 18, 2015.

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34	Emily R. Brown BPI	3. Altgeld Gardens Redevelopment: We are pleased to see the list of community facilities (p. 23) that CHA plans to renovate at Altgeld Gardens in FY 2016. Completion of these important projects will be of great benefit to the Altgeld community. (As we know CHA understands, anticipated "quality of life" benefits from these projects will not be fully realized if the safety and security problems at Altgeld are not more aggressively addressed).	Thank you for your comment.
35	Emily R. Brown BPI	4. Mobility Counseling: Data show that too many families are using CHA vouchers to move into high poverty, racially segregated areas. A substantial increase in the kind and amount of counseling provided, along with modification of voucher procedures, is required to deal effectively with this harsh reality. An appropriate portion of CHA's resources could and should be used for this purpose. The draft Plan is vague with respect to the amount of CHA expenditures on mobility and plans, if any, to revise voucher procedures. It is suggested that the final Plan should include an expanded and more effective mobility program along with more detailed information about how it will be funded, with particular attention being paid to the need for adequate exception rents in high opportunity areas.	Thank you for your comment.
36	Amanda Kass Center for Tax and Budget Accountability	1. What is the total amount the Chicago Housing Authority (CHA) has budgeted for capital and capital-related expenses for FY2016?  The FY2016 budget for total capital spending is reported as \$239,474,745 in the Proposed FY2016 Plan on page 68, but \$291.4 million on page 24. Further, while the total is listed on page 68 is \$239,474,745, the line items for the capital category add up to \$296,885,045.	The FY2016 budget for capital spending is \$291,351,405, which is consistent with Capital Repairs and Improvements reported on page 68 and the \$291.4M reported on page 24. The schedule on page 68 is in error. The correct amount of \$296,885,045 includes capital administrative costs of \$5,533,640.

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37	Amanda Kass Center for Tax and Budget Accountability	<p>2. What is the CHA's total reserve fund projected to be at the end of 2016?</p> <p>It is unclear what the CHA's actual reserves are in the Proposed FY2016 MTW Plan. Pages 68 and 70 reference using \$105.6 million of reserves for 2016 expenditures; however, the CHA's total reserve is never reported and from other recently issued CHA reports it would appear that its reserve exceeds this amount. In the Quarterly Report for the 2nd quarter of 2015, for example, the "Reserves Summary" reflects that at the end of 2015 the CHA anticipates it will have \$131 million in reserves (p. 27). A footnote further states, "CHA maintains a HUD-allowed operating reserve of \$119M that the agency intends to use for future capital expenditures," which would indicate the actual total reserve at the end of 2015 is \$250.497 million. This amount (\$259.497 million) is also much less than the CHA's working capital that is reported in its Comprehensive Annual Financial Reports, which as of the end of 2014 was reported as \$429.78 million (see p. 31 of the 2014 CAFR).</p>	<p>The development reserve balance as of the beginning of the year on January 1, 2015 was \$221 million. CHA also has an operations reserve of \$120 million. CHA plans to expend \$90 million of the development reserve balance this year on capital projects and resident services. CHA anticipates a balance of \$131 million remaining in the development reserve by the end of 2015. CHA expects to spend down the development reserve funds to approximately \$25 million by the end of 2016.</p>
38	Amanda Kass Center for Tax and Budget Accountability	<p>3. Has the debt service decreased, and if so why? It appears that CHA's debt service has decreased substantially in the past year. In the FY2014 MTW Annual Plan Capital Plan, it was budgeted at \$29,097 (p. 47), but the actuals show \$1,338 (p. 27). A similar trend for the FY2015 exists with it budgeted at \$19,537,244 (p. 47) and then a decreased budgeted amount in the later Quarterly Report \$2,296.</p>	<p>Debt service has decreased due to bond defeasance. As noted in CHA's 2012 Comprehensive Annual Financial Report (CAFR), in 2012, CHA repurchased \$29.9M of outstanding 2006 capital program revenue bonds and created a \$147.2M irrevocable trust fund to defease an additional \$126.9M in bond principal and interest.</p>
39	Amanda Kass Center for Tax and Budget Accountability	<p>4. What is the standard practice for other Public Housing Authorities (PHAs) in the recording of depreciation, and is CHA able to record it as an expense because of its participation in the Moving to Work program?</p> <p>In the Annual Plans, CHA records depreciation as a "Use on the FDS line item. CHA reports depreciation as an expense (rather than a use), per standard accounting practices." In the Comprehensive Annual Financial Report for 2013, it shows that depreciation is considered an "adjustment to reconcile" in the operating expense account. CHA then reconciles operating expenses by adding the depreciation back in (153.1 million) as cash source to balance its operating</p>	<p>CHA follows Generally Accepted Accounting Principles (GAAP) in its treatment of depreciation as is required by HUD's MTW Agreement. CHA'S review of many large PHA financial reports show similar treatment of depreciation and appear to be in keeping with GAAP guidelines. CHA's reporting of depreciation in the MTW Annual Plan is consistent with MTW reporting requirements. The Comprehensive Annual Financial Report (CAFR) presentation of the Statements of</p>

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		loss in the "Statements of Cash Flows-Proprietary Fund Type- Enterprise Fund" (p.39).	Cash Flows is consistent with GAAP guidelines.
40	Amanda Kass Center for Tax and Budget Accountability	The treatment of depreciation is a core issue that calls into question how much the reserve account actually is—as CTBA pointed out in its July 2014 report, depreciation is a non-cash outlay and inclusion of it as a proposed spending item is problematic since the non-cash outlays do not constitute actual spending, nor require the use of revenue. However, CHA may state that its treatment of depreciation is per HUD regulations for Revised Form 50900 and the definitions for FDS Line Items. The inclusion of depreciation in the CHA's MTW Plans, however, is a relatively new practice. In prior years depreciation was never included in the MTW Plans and CHA reconciled depreciation and other "add-backs and back-outs" in its MTW Reports, which resulted in an accurate reflection of whether it had a surplus or deficit at the end of a fiscal year (this reconciliation was not done in all MTW Reports)—as example, the image below is from the CHA's 2009 MTW Report (p. 91) Is there flexibility to record depreciation differently (not as an expense) since it is not an actual cash expense?	CHA complies with MTW reporting requirements for MTW annual plans and reports. The "relatively new practice" of reporting depreciation in the MTW Plan is a direct result of HUD changing these reporting requirements in May 2013.
41	Amanda Kass Center for Tax and Budget Accountability	What is CHA's total proposed spending for 2016? And what is its projected revenue for 2016 from all sources?  The financial figures in the tables for the Estimated Sources and Uses of MTW Funding for FY2016 on pages 66 and 67, and the "USE of MTW SINGLE FUND" table on page 68 do not reconcile, and as such CHA's total spending and revenue for 2016 are unclear. As an example, total expenses on page 67(line-item 90000) is \$932,173,557, this amount less depreciation equals \$770,339,064 and adding in the total capital spending of \$239.47 million from the table on page 68 equals \$1,009,813,809. As such, this would indicate the CHA's actual, total spending being proposed for 2016 is \$1,009,813,809. However, the "total uses" listed on page 68 is \$1,040,857,209. There is no way to reconcile these numbers, and as such it is unclear what the CHA's total proposed spending is for 2016.	CHA is budgeting Sources of \$1,062,940,469 in 2016, which includes the use of \$105,568,435 of Development Reserves. CHA is budgeting Uses of \$1,062,940,469 which includes \$1,250,000 of debt service principal payments and \$291,351,405 of capital expenditures. The Sources and Uses tables on pages 66 and 67 reflect FDS reporting as directed by HUD. Sources do not include Development Reserves and Uses do not include principal payments and capital expenditures. Uses do include depreciation of \$161,834,493.

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42	Elizabeth Rosenthal Legal Assistance Foundation	<p>I. Earned Income Disregard Simplification (page 30)CHA proposes to make the EID a one-time, 24-month limit benefit for all public housing and voucher program participants in the name of administrative efficiency. This proposal should be rescinded because the negative effect on participants outweighs the CHA's "efficiency" rationale.HUD's design of the Earned Income Disregard encourages tenants receiving public assistance to attempt work in two ways. First, by disregarding all or half of the income for 24 months, it eliminates the disincentive to work that is realized when rent immediately increases upon tenants' increasing income. Second, by allowing tenants to spread the 24 months of EID over a 48 month period, it recognizes that low-income individuals who have been out of the workforce have many barriers to sustaining work (inadequate child care, lack of sick days, unpaid family and medical leave, and general first-hired/first-fired policies). CHA's proposal to limit the EID to 24 months eliminates the second protection. CHA's rationale that the biennial recertification protects these tenants lacks the specific targeting of the EID realized in HUD's design. Laudable for its administrative efficiency, the biennial recertification applies to all tenants, not just those attempting work. So, it is both over-inclusive of tenants who are merely increasing income from increased work and under-inclusive of the most vulnerable tenants who really need the 48 months to make work an on-going reality (the way that the elimination of the 48 month period could affect vulnerable workers is demonstrated in the Table below).</p>	<p>Thank you for bringing forth these considerations. CHA has decided to conduct additional research in order to determine the overall effectiveness of this policy change and therefore, CHA will not proceed with EID simplification at this time.</p>

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43	Elizabeth Rosenthal Legal Assistance Foundation	<p>Because the EID in the Voucher Program only applies to tenants living with disabilities, CHA's proposed efficiency savings comes from its most vulnerable participants. This is especially true considering the disadvantages that workers with disabilities face in trying to sustain employment. For example, research shows that during the 2008-10 recession, workers with disabilities were laid off more frequently than non-disabled workers: "approximately twelve percent of people with disabilities were terminated during the hardest months of the recession, as compared to approximately three percent for people without disabilities." Pearlman, et al., Reassessing The Recession: Discrimination In Hiring And Firing Of People With Disabilities, 3 Los ANGELES PUBLICINTEREST LAW JOURNAL 18 (2011). People living with mental and emotional challenges are the hardest hit. Cook, et al., Reasons for Job Separations Among People with Psychiatric Disabilities, MATHEMATICA DRC BRIEF 2015 - 04 (May 2015)(participants in a SAMSHA stud held an average of 2.4 jobs in a 24 month period and separated from work for many reasons with disability related voluntary leaves and terminations among the leading reasons). Much work and additional policy changes (such as mandatory paid sick leave) are necessary to ensure that low-income workers, especially those living with disabilities, are able to sustain work. CHA's proposed change heads in the wrong direction from this important goal.</p>	<p>Thank you for bringing forth these considerations. CHA has decided to conduct additional research in order to determine the overall effectiveness of this policy change and therefore, CHA will not proceed with EID simplification at this time.</p>
44	Elizabeth Rosenthal Legal Assistance Foundation	<p><u>Table</u></p> <p>January 2014: Annual recertification  November 2015: Tenant obtains employment  January 2016: Biennial recertification (EID clock starts, income from new job disregarded)  February 2016: Tenant loses job (EID clock keeps running)  January 2018: Biennial recertification (EID eligibility ends, even though tenant only received 2 months of EID benefit; tenant would have additional 22 months of EID benefit to claim – up to Dec 2019 – under current system)</p> <p>For these reasons, CHA should make no changes to its current EID policies for either public housing residents or housing choice voucher holders.</p>	<p>Please see response to previous comment.</p>

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45	Elizabeth Rosenthal Legal Assistance Foundation	<p>II. Mobility Counseling Demonstration Program Work Requirement (page 31)</p> <p>CHA proposes to add a work requirement to its Mobility Counseling Demonstration (MCD). This plan should not be adopted 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 special assistance in seeking housing in opportunity areas just adds another step in an already stress-filled and time-consuming process: identifying an appropriate neighborhood, identifying a landlord who will rent to a voucher holder (even though landlords are not supposed to discriminate against voucher holders), identifying an appropriate unit that meets the payment limits, passing inspection, etc. The goals of the MCD program are to help voucher holders access opportunity areas, and CHA is falling short of its goals. Before adding more hoops for participants to jump through, CHA should focus its efforts on helping participants find quality, affordable housing in opportunity areas and recruiting quality landlords with quality properties to participate. Also, CHA has not stated, troublingly, what happens if someone who is participating in the MCD then falls out of compliance with the work requirement- it is unclear whether they will be terminated (whether or not they are housed) or returned to a waiting list, or some other undetermined outcome.</p>	<p>The Altgeld Mobility Counseling Demonstration Program differs from CHA's Mobility Counseling program. First, the population is drawn from the public housing waitlist (as of 12/16/14)-a population that is already required to meet a work requirement upon entrance. The Mobility Demonstration Program is not requiring participants to be meeting the requirement upon entrance, but rather post move-in, when services will be available. Finally, participants in the MDP automatically have 150 days on their voucher compared to 90 days in the mobility counseling program.</p>
46	Elizabeth Rosenthal Legal Assistance Foundation	<p>III. Counting Project Based Vouchers toward unit delivery under the Plan (pages 36-38)</p> <p>CHA has received MTW authority to count its project-based vouchers toward the delivery of the 25,000 units promised under the Plan for Transformation. These units should only be counted 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 only to people on the project-based voucher waiting list and other "special" populations, such as formerly homeless people or people who need additional supportive services. With the need for affordable housing so great in this City, CHA should be expanding housing opportunities beyond the 25,000 replacement units and therefore should not include PBVs that are not available to families with a Right of Return in the 25,000 replacement unit count.</p>	<p>Thank you for your comment.</p>

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47	Elizabeth Rosenthal Legal Assistance Foundation	IV. Minimum Rent (page 40) CHA should amend its MTW plan to return the minimum rent to \$50. Leaving aside that CHA never properly received MTW authority to change the minimum rent in the HCV Program, Property Managers and Housing Specialists do not properly screen residents who qualify for the exemption to fulfill their duty to apply the minimum rent hardship exemption or notify residents and participants that the exemption is even available. Accordingly, CHA is achieving its MTW objective on the backs of some of the poorest program participants who are already struggling to pay utilities and other necessary expenses. The modest increase in revenue to CHA does not outweigh the burden on CHA's poorest families and does not promote stability or self-sufficiency. There is no good rationale for CHA to charge more than the statute permits and the minimum rent structure should be reformed.	CHA received approval and adopted the \$75 minimum rent policy in FY2009 across public housing and HCV programs. CHA does not currently have plans to adjust this policy. Residents who cannot meet the minimum rent requirement may request hardship remedies.
48	Elizabeth Rosenthal Legal Assistance Foundation	V. Mixed-income Ombudsman (pages 50-51) CHA should rescind its policy that it does not recognize 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. It is telling that CHA describes that the role of its Ombudsman is to help the residents "adapt to their communities." While this is certainly an important job, it is different in many respects from what a Local Advisory Council could provide. LACs provide voice and an advocate for tenants within those new communities, 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 insofar as CHA will act 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.	Thank you for your comment.

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49	Elizabeth Rosenthal Legal Assistance Foundation	VI. Planned Disposition Activity (page 19) Insofar as the parcel described as having boundaries of W Wendell, W Walton, N Orleans, and N Larrabee (IL00208900) includes the Cabrini Green Rowhouses (rehabbed and unrehabbed), this should be removed or re-described to exclude the Rowhouses. To fulfill its obligations to affirmatively further fair housing, CHA should immediately rehabilitate the unrehabbed Rowhouses as 100% public housing, not convey the land for mixed-income or retail development. The rehabbed Rowhouses should be excluded from any conveyance as they are already completed and counted toward CHA's unit delivery under the Plan for Transformation.	Thank you for your comment.
50	Jeremy Bergstrom Shriver Center	Section II, p. 19 - Moderate Rehabilitation Transition to PRA/PBV It is not appropriate for the CHA to count converted units towards its unit delivery when there is no net gain of units.	Thank you for your comment.
51	Jeremy Bergstrom Shriver Center	Section II, p. 19 - Summary of PRA/PBV Units Counted Toward Overall Unit Delivery Progress CHA should only count net units under HAP towards its unit delivery count. Where a HAP is terminated or removed, CHA should no longer count it towards its unit delivery count.	Thank you for your comment. CHA counts net PBV units.
52	Jeremy Bergstrom Shriver Center	Section II, p. 20 - Long Term Plan for Offline Units Status CHA should bring all available units online immediately. It is unconscionable that CHA has habitable units of public housing available but sitting vacant, especially given the size of CHA's wait list and the size of Chicago's homeless population.	Thank you for your comment.
53	Jeremy Bergstrom Shriver Center	Section II, p. 21 - Lathrop Homes - 753 offline units CHA should bring all available units at Lathrop online immediately. It is unconscionable that CHA has habitable units of public housing available but sitting vacant, especially given the size of CHA's wait lists, the number of former Lathrop residents with a right to return, and the size of Chicago's homeless population.	Thank you for your comment.
54	Jeremy Bergstrom Shriver Center	Section II, p. 23 - Additional Planned Capital Maintenance Activity in FY2016 CHA should take care to ensure that all relocation rights of residents are respected, particularly in the case of relocations of seniors and those with disabilities. CHA should treat legal requirements as the	Thank you for your comment.

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		floor, not the ceiling, when it comes to relocation assistance.	
55	Jeremy Bergstrom Shriver Center	Section II-B, p. 26 Leasing Information CHA should use all available funds and resources to house the maximum number of households possible, given the size of CHA's wait list and the community's need for affordable housing.	Thank you for your comment.
56	Jeremy Bergstrom Shriver Center	Section III, p. 30 - MTW Activities Related to Public Housing and HCV Earned Income Disregard Simplification for Public Housing and HCV (2016-01) CHA should not change its EID policy for the sake of simplification when it will disadvantage residents and ultimately lose its potential to incentivize employment. CHA's stated savings for this program is modest given the potential negative impact of discontinuing the current policy. It is not unusual for people to lose employment through no fault of their own, particularly low-wage, unskilled workers, and many must accept seasonal or temporary employment when those are the jobs available. Moreover, CHA's EID program for the Housing Choice Voucher program is only available to disabled households who are more likely to experience challenges finding and maintaining employment. Reducing the potential benefits of the EID program would particularly disadvantage this vulnerable population of subsidized households. HUD's EID policy of allowing up to 24 months of income disregard over 48 months is written to account for the real life circumstances of HUD-subsidized households. We strongly encourage CHA to make no change to its EID policies in either its public housing or HCV program.	Thank you for bringing forth these considerations. CHA has decided to conduct additional research in order to determine the overall effectiveness of this policy change and therefore, CHA will not proceed with EID simplification at this time.
57	Jeremy Bergstrom Shriver Center	Section III, p. 31 - Mobility Counseling Demonstration Program Work Requirement (2016-02) Adding a work requirement to the Mobility Counseling Demonstration Program (MCD) will only serve as a disincentive to people considering participating in this important program. The MCD program is designed to encourage residents to move to areas of greater integration and less segregation. The CHA should be doing all it can to encourage, and not discourage, participation. Access to better employment opportunities is a likely advantage of moving to an opportunity area. CHA's addition of a work requirement as a requirement of participation in MCD is unwise and simply punitive. It is completely counter to good policy that a household might face a loss of housing because it has suffered a	Families participating in the Mobility Counseling Demonstration Program will be pulled from the Public Housing waiting list, which is already subject to the work requirement. CHA applied the work requirement to this demonstration program to maintain consistent policies for this population.

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Comment #	Individual/Organization	Comment	CHA Response
		loss of work. CHA should abandon outdated, scientifically unsupported, and unsuccessful policies that tie housing to a work requirement.	
58	Jeremy Bergstrom Shriver Center	Section IV, p. 36 - MTW Activities Related to Housing/Development A substantial number of units that CHA suggests it will bring online in FY16 – one-third of the 1038 planned units – are proposed to come from preservation of public housing units and Mod Rehab conversions. CHA should focus its unit delivery on actual net additions to its housing stock. Rehabbing vacant units to bring them back online is CHA should not be allowed to pat itself on the back when it allows units to become uninhabitable. Further, CHA should not count Project Based Voucher units towards its unit delivery count if those units are not available to families with a right to return (so-called “10/1/99 families”).	Thank you for your comment.
59	Jeremy Bergstrom Shriver Center	Section IV, p. 40 - MTW Activities Related to Public Housing and HCV - \$75 Minimum Rent for Public Housing and HCV (2009-01) It is unfathomable that CHA continues – and that HUD permits the CHA– to use its MTW authority to punish its lowest-income residents by demanding a higher minimum rent than permitted by statutes and regulations that ordinarily apply to public housing authorities. CHA offers no rational reason for its increased minimum rent, especially given its financial health and overabundance of monetary reserves. The fact that CHA reports only 4% of minimum rent families have been determined to be eligible for the hardship exemption demonstrates that the exemption is not properly functioning as a safety buffer for families who cannot afford the minimum rent. It is time that CHA finally end what can only be described as abuse of the MTW program. There should be no minimum rent required of families whose income does not support it according to the usual formulas for calculating rent in the public housing and HCV programs.	CHA adopted the \$75 minimum rent policy in FY2009 across public housing and HCV programs. CHA does not currently have plans to adjust this policy. Residents who cannot meet the minimum rent requirement may request hardship remedies.
60	Jeremy Bergstrom Shriver Center	Section IV, p. 45 - CHA Re-Entry Pilot Program (2014-04) We commend CHA for implementing this pilot program, and encourage CHA to expand the scope.	Thank you for your comment.

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61	Jeremy Bergstrom Shriver Center	Section IV, pp. 50-51 - Office of the Ombudsman (2008-01) Another abuse of the MTW program is CHA's waiver of the requirements to permit mixed-income public housing residents to organize and be represented through a Local Advisory Council (LAC). The Office of the Ombudsman does not serve the same practical or regulatory purposes as LACs. CHA's waiver serves no legitimate MTW goal and instead results in public housing residents having less opportunity to participate in their community than others in their community. CHA should end this punitive practice and restore funding and support to LACs at mixed-income developments.	Thank you for your comment.
62	Jeremy Bergstrom Shriver Center	CHA should amend its FY16 MTW Plan to ensure that Section 8 funding of RAD properties is subject to Section 3 rules at 24 C.F.R. § 135.3, minimally. CHA should increase the scope of Section 3 and ensure that those principals apply at RAD properties in order to increase job opportunities for CHA's residents.	CHA will continue to comply with its Section 3 VCA as well as all Section 3 regulations as they may apply to the RAD and PRA programs.
63	Julia Sanders	I would like to know if Altgeld Gardens is closing? If the tenants have to relocate? When you tear those down you're -- are you building more out there?	CHA is not closing the Altgeld Gardens development. CHA has scheduled approximately \$68 million in capital improvements at the property. This work will be completed over the next 2 to 3 years and includes the rehabilitation of 218 apartments, roof replacement at the Carver Park District fieldhouse, road resurfacing for 133rd Street and 133rd Place, and the rehabilitation of the previous library structure into the new Property Management Office. CHA is working on plans for additional community amenities including a new library and community center.
64	Judith Wilson	Why does CHA senior housing tell most that they have to be 62 years of age to be able to live at a senior housing?	CHA offers both traditional senior buildings and reduced-age senior buildings. You must be a minimum of 60 years of age to apply for traditional senior properties and 62 years of age to be housed. For reduced age-properties, you must be a minimum of 55 years of age to apply and be housed. The following buildings are reduced-age senior

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			properties: Albany Terrace (3030 W. 21st Pl, Irene McCoy Gaines (3700 W. Congress, Judge Slater (740 E. 43rd St., Mary Jane Richardson Jones (4930 S. Langley), Minnie Riperton (4250 S. Princeton), Patrick Sullivan (1633 W. Madison), Robert Lawrence (655 W. 65th Street), and Vivian Carter (6401 S. Yale).
65	Unknown	When if any, of the Super Block and West Haven, Henry Horner project going into effect?"	The redevelopment of the Horner Superblock/Villages of Westhaven will begin in 2016.
66	Unknown	Will it be this year? ( <i>reference to Super Block</i> )	The redevelopment of the Horner Superblock/Villages of Westhaven will begin in 2016.
67	Shonara Brifford	I would like to know why there aren't any more splits in the housing units?	Split Family Transfers are currently offered in accordance with Section V. G of the ACOP.
68	Unknown	What are the changes for Section 8 recipients as far as them having a deadline to bring a voucher holder -- to bring a voucher holder? Is there a status on being a participant?  Maybe a few years ago I was told that if you're a voucher holder, have Section 8, you could only hold a voucher for like so many years and you're out of the system and you're on your own.	There is no time limit for the Section 8 program, also known as the Housing Choice Voucher program. Families with a voucher can keep a voucher for as long as they continue to qualify for it.
69	Judith Wilson	Is it possible if you're living in a senior housing, can you relocate to a regular CHA town home with one bedroom? Do you have to be on the waiting list?	CHA offers one-bedroom townhome units but does not maintain a separate waitlist for such units. If seeking to transfer from senior to family housing, there is no way to guarantee housing placement in a townhome. Unit offers are based on availability.

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Comment #	Individual/Organization	Comment	CHA Response
70	Ms. Sanders	<p>The (Atgeld) Gardens have changed within the last six years. What I mean by that is, within the last six years I've been staying out there, it's people that have been out there way longer than me. And it – they said, I guess within the last six years, it seems like some things had improved, but within the last six years I have been out there, the beautification of the things they brought to the Gardens, they are destroying it again. And like it's some people that – they call where I live, they call them blocks. Me, myself to see some of these people and the things they have done, I don't even see how they are still there.</p> <p>I'm like what is it really going to take to get them out of there? I feel like I live in a nice little block area, but it's a couple people that's there, it's like how many times the police been there and did the things they did? I don't –</p>	Thank you for your comment. CHA's Office of Safety and Security along with property management are engaged with the Chicago Police Department's 5th District in prosecuting any offenders who disrupt the safe and peaceful environment for Altgeld residents.
71	Unknown	In the near future are recipients still only going to be responsible for 30 percent of their income?	CHA adheres to HUD regulations that require residents to pay only 30 percent of their income in the public housing and HCV programs.
72	Ms. Wilson	All right. Again, from what I was told, if you have a household of three, for instance two boys, you're only qualified for two bedrooms because it's two heartbeats to a room. If your rent is \$500 and you find a three bedroom that accommodates both of your kids and yourself which is a three bedroom and it's still within the same bracket, can you get that apartment?	HCV participants can rent a unit that is larger than the unit size indicated on their voucher. For example, when CHA approves a family for a two-bedroom unit, the family can look for an apartment up to a certain amount of rent. If the family finds a three-bedroom unit within that rent limit, the family can rent that unit.
73	Lauretta Harrison	I am glad that I became a long time resident of Robert Brooks (1943), public housing community.	Thank you for your comment.
74	Tanya Mykhailenko	<p>I have a question as far as – Rumor has it that in 2016 – but, please clarify – that in 2016 HUD is supposed to end.</p> <p>So for it to get an extension, there was probably an ending because you had to extend something that was about to end?</p>	CHA and other MTW agencies continue to work with HUD on terms for the extension of current MTW agreements. CHA's current MTW agreement expires in 2018, and the new agreement would extend participation to 2028.
75	Tanya Mykhailenko	What's going on with Cabrini Green Rowhouses? This is on page 6.	The CHA is working with representatives for the resident organizations, the City of Chicago, and Gautreaux court plaintiffs to create compensative plans for the area and for the remaining Cabrini Green Rowhouses site. When

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			negotiations are complete, further information will be forthcoming.
76	Jeff Garcia	On page 10, on the approved MTW activities, public housing activities, it says public housing work requirement. What does that entail? Does it take into consideration a personal injury of a tenant?	The public housing work requirement is defined as working, being in school, or in a training program for 20 hours per week for able bodied individuals 18-54. The work requirement has a safe harbor election for temporary conditions that would prevent someone from meeting the obligation as well as an exemption for persons with disabilities or who are over 55.
77	Tanya Mykhailenko	I have a question on page 5. What is the age -- What is the age -- starting age of a senior for CHA, you're developing a hundred percent -- Not 55? Do you kind of know offhand whether the 55-year-old (inaudible) building for seniors?	CHA offers both traditional senior buildings and reduced-age senior buildings. Applicants must be a minimum of 60 years of age to apply for traditional senior properties and 62 years of age to be housed. For reduced age-properties, applicants must be a minimum of 55 years of age to apply and be housed. The following buildings are currently reduced-age senior properties: Albany Terrace (3030 W. 21st Pl, Irene McCoy Gaines (3700 W. Congress, Judge Slater (740 E. 43rd St., Mary Jane Richardson Jones (4930 S. Langley), Minnie Riperton (4250 S. Princeton), Patrick Sullivan (1633 W. Madison), Robert Lawrence (655 W. 65th Street), and Vivian Carter (6401 S. Yale).
78	Unknown	You say it's move to work? We're seniors, we're retired, so we not going to work. This is very confusing to us. I don't understand a lot. There is a lot of initials, doesn't make any sense really. None of this explains what's going on, and I'm pretty well up on a lot of things. But to me, I basically I don't think any of this concerns me.	CHA participates in HUD's Moving to Work (MTW) Demonstration Program. The FY2016 MTW Annual Plan is the agency's annual plan, required by HUD. CHA encourages residents to move toward self-sufficiency, however the purpose of the annual plan is to outline CHA's plans and initiatives for the upcoming year.
79	Unknown	When you move in the building they should screen for bed bugs then, not when they come in. They bring bed bugs in the building. They need screens for bed bugs when they get in the building. They are supposed to screen before they get in here.	Thank you for your comment. CHA takes the issue of bedbugs very seriously. All efforts are undertaken to ensure their elimination on our properties.

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Comment #	Individual/Organization	Comment	CHA Response
80	Leah Levinger Chicago Housing Initiative	1.What is the proposed capital expense plan for Altgeld Gardens? 2. What is the timetable construction to begin? 3. What are the CHA's plans for ensuring residents access to jobs in the construction work?	Currently there is approximately \$68 million in capital improvements planned at Altgeld Gardens. Construction activities began on August 22, 2015 for the rehabilitation of 218 units.  CHA is committed to both Section 3 hiring and subcontracting and will work with all general contractors to meet both the Section 3 hiring and subcontracting requirements.
81	Leah Levinger Chicago Housing Initiative	Can you talk about the ownership entities proposed on RAD, conversions, and the impact on RAD on CHA's finances?	CHA applied for RAD in order to stabilize the funding for, as well as preserve and protect CHA housing. While RAD presents an additional benefit of leveraging alternate financing for improvements as needs arise, the main benefit to CHA is transitioning to a more stable funding platform. CHA will continue to own the properties it currently owns and mixed-income/mixed-finance properties will also have no change in ownership.
82	Unknown	I just want to comment earlier on Altgeld Garden. I grew up out there as a kid. I just wanted to take her out to show her Altgeld Garden, and I could not believe the way it was looking. I went by the building, the administration building. Everything was falling part. I said, what are they doing? Why aren't they doing something with it? It was heartbreaking to see it looking like that.	Currently there is approximately \$68 million in capital improvements planned at Altgeld Gardens. Construction activities began on August 22, 2015 for the rehabilitation of 218 units. Other construction activities will be completed at the development on a rolling basis over the next 2 to 3 years.
83	Unknown	Is this RAD program, is this only designed for the property which is assigned on these different documents here, this RAD assistance demonstration? This is money that you're going to give us, is this correct, that is for living purposes and we will pay the difference in rent? Is that what you're telling us?	The Rental Assistance Demonstration (RAD) program switches the source of the funding HUD gives CHA to operate its properties to a more stable funding source. While the funding won't go directly to the residents, the funding will be used to pay the difference between what the tenants provide in rent, and what it actually costs to operate the building. Residents will still continue to only

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Comment #	Individual/Organization	Comment	CHA Response
			pay 30% of their income as rent. Another benefit of RAD is that it allows CHA to leverage private financing to make capital improvements to the property over the life of the contract. Each contract for RAD is 20 years, with a mandatory renewal for another 20 years.
84	Unknown	We were not on the list. <i>(reference to RAD)</i>	CHA submitted a portfolio application to HUD in 2013 to convert 10,935 public housing units to RAD in two phases. The Phase I properties have been identified and estimate approximately 6,800 units. A listing of those properties was published in CHA's FY2014 MTW Annual Plan, as required by HUD and two resident meetings were held at each property to ensure the residents were aware of the plan for conversion. Individual applications were submitted to HUD as authorized by CHA's Board of Commissioners. CHA is in the process of selecting additional properties for Phase II and will be required to publish a list of those properties in the MTW Annual Plan as well as obtain CHA's Board of Commissioners approval before submitting any applications for those properties.

FY2016 MTW Annual Plan Public Comment Period: July 22 - August 21, 2015			
Comment #	Individual/Organization	Comment	CHA Response
85	Central Advisory Council	(1) The CAC opposes CHA's proposed revisions to the Earned Income Disregard ("EID") policy. Under the present EID policy, public housing residents can obtain a full or partial waiver for any increases in income for a period of two years. Additionally, residents can pause the two-year EID clock if they experience a loss of income. This allows the resident to obtain the full two-year benefit of the EID, even if they experience an unexpected job loss or income reduction. Under CHA's proposed new MTW rule, however, residents will no longer be permitted to pause the two-year EID clock if they lose their job. This is extremely concerning because sociologists have found that workers (especially low-skilled workers) are most likely to lose a job in the first three months of work. See H. Holzer and R. Lalonde, "Job Stability and Change among Less-Educated Young Workers," in Finding Jobs: Work and Welfare Reform, ed. D. Card and R. Blank (New York: Russell Sage Foundation, 2000). Thus, even though many CHA residents who find work will inevitably lose it shortly after being hired, they will not receive the full benefit of the EID. From the CAC's perspective, the modest cost of tracking EID start and stop dates is well worth the incentives it provides to residents to maintain employment and increase their income. Accordingly, the EID rules should not be changed.	Thank you for bringing forth these considerations. CHA has decided to conduct additional research in order to determine the overall effectiveness of this policy change and therefore, CHA will not proceed with EID simplification at this time.
86	Central Advisory Council	(2) The CAC also opposes CHA's proposed work requirement for individuals participating in the Mobility Counseling Demonstration ("MCD") program. It has been exceedingly difficult for CHA to find residents to participate in the MCD program, despite its important goal of dispersing HCV residents throughout Chicago and reducing segregation. As it stands, HCV residents are highly concentrated in segregated areas of the city, and CHA should do everything it can to promote the success of the MCD program and alleviate that segregation. Adding a work requirement to the MCD program will only make it less appealing to residents. In short, CHA should not create additional disincentives to potential participation in this important program.	The (Altgeld) Mobility Counseling Demonstration Program is a separate program from its Mobility Counseling program. For this demonstration program, the population is drawn from the public housing waitlist (as of 12/16/14)-a population that is already required to meet a work requirement upon entrance. The Mobility Demonstration Program is not requiring participants to be meeting the requirement upon entrance, but rather post move-in, when services will be available. This is a voluntary program for people coming from the PH waitlist in order to meet the match requirement for rehabbing of 218 units at Altgeld Gardens.

FY2016 MTW Annual Plan Public Comment Period: July 22 - August 21, 2015			
Comment #	Individual/ Organization	Comment	CHA Response
87	Central Advisory Council	(3) CHA should amend its MTW plan to adjust the minimum rent back down to \$50. There is no good reason for CHA to charge its lowest income residents more than the U.S. Housing Act permits. The CAC understands that residents can apply for a hardship exemption, but property managers do not adequately notify residents of this option during recertification meetings. As a result, very-low income residents do not apply for the exemption, and CHA takes an additional \$25 per month from some of the absolute poorest residents in the City.	CHA adopted the \$75 minimum rent policy in FY2009 across public housing and HCV programs. CHA does not currently have plans to adjust this policy. Residents who cannot meet the minimum rent requirement may request hardship remedies.
88	Central Advisory Council	(4) CHA should amend its MTW plan to permit residents to defend against an eviction by raising an "innocent-tenant" defense. This defense would permit a resident to avoid eviction by proving that he or she neither knew nor should have known that a household member or guest engaged in criminal activity. CHA families should not be rendered homeless on account of criminal acts of which the head of household was unaware. One-strike policies are draconian and unfairly punitive, rendering young adults and children homeless based on relatively trivial criminal infractions committed by a guest or family member. An innocent tenant defense will go a long way in remedying the policies' overly harsh effects.	The "innocent-tenant" defense provision will be maintained for those properties where the provision currently exists.
89	Central Advisory Council	(5) CHA should fund and recognize tenant councils in mixed-income developments. CHA's decision to obtain a waiver from HUD on this issue was a mistake, as it leaves public housing residents without an adequate voice. CHA should recognize and fund tenant organizations for these mixed income developments, so they can participate – along with the CAC – in addressing issues of public housing residents.	Thank you for your comment.
90	Central Advisory Council	(6) CHA should amend its MTW plan to provide that Section 8 funding used for the operating assistance of RAD properties shall be subject to the Section 3 rules outlined in 24 C.F.R. § 135.3. Presently, the Section 3 rules do not apply to operating assistance provided to Section 8 properties. This means that property managers of Section 8 properties do not have to make efforts to hire residents for available positions in security, landscaping, administration, etc. Amending the MTW Plan to increase the scope of Section 3 would increase job opportunities for residents by ensuring that property managers (and their subcontractors) hire residents on a regular basis.	CHA will continue to comply with its Section 3 VCA as well as all Section 3 regulations as they may apply to the RAD and PRA programs.

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Comment #	Individual/Organization	Comment	CHA Response
91	Central Advisory Council	(7) CHA's 2016 MTW Plan is notable in that it provides no plan whatsoever for building on the former site of LeClaire Courts. As Mr. Robert Whitfield stated in his comments, "It is disturbing that after years of broken promises by CHA regarding the LeClaire site, the draft CHA FY 2016 Annual Plan omits any reference to the future redevelopment of the LeClaire site. CHA should, at the very least, insert very specific language in the draft CHA Plan on the current status of the redevelopment of the LeClaire site. CHA should also convene regular meetings with former LeClaire residents so they are kept informed on the redevelopment of the LeClaire site." The CAC asks CHA to explain why there appears to be no plan to redevelop the LeClaire property.	CHA continues to explore opportunities to initiate development activities at the former LeClaire Courts site.
92	Betty Davis	What does Moving to Work mean?	This question was addressed on a phone call. CHA participates in HUD's Moving to Work (MTW) Demonstration Program. The FY2016 MTW Annual Plan is the agency's annual plan, required by HUD.
93	Unknown Caller	What is the MTW Plan?	This question was addressed on a phone call. CHA participates in HUD's Moving to Work (MTW) Demonstration Program. The FY2016 MTW Annual Plan is the agency's annual plan, required by HUD.
94	Howard Simon	Can you explain what the FY2016 Moving to Work Annual Plan is? I'm disabled so I just want to know what it is.	This question was addressed on a phone call. CHA participates in HUD's Moving to Work (MTW) Demonstration Program. The FY2016 MTW Annual Plan is the agency's annual plan, required by HUD.

**Public Comment Info and Grid – FY2016 MTW Annual Plan Amendment**

Prior to submission of the Amended FY2016 MTW Annual Plan for CHA Board approval, a 30-day public comment period was conducted from February 19 through March 21, 2016. CHA held two public hearings during the comment period, on February 23 (Charles Hayes Family Investment Center, 4859 S Wabash) and on March 2 (Patrick Sullivan Senior Apts, 1633 W Madison). A total of 16 people participated in these hearings. The following table includes public comments and CHA responses.

**Proposed FY2016 MTW Annual Plan Amendment  
Public Comment Period: February 19 - March 21, 2016**

Comment #	Individual/Organization	Comment	CHA Response
1	Carla Jackson <girlfriend50.cj@gmail.com>	I would like to see CHA passed the 2 heart beats 2 a room girl & boy have 2 different body parts & they need own privacy. Thank you for your time in this matter	Thank you for your comment. CHA recently held a series of resident listening sessions on this topic and is considering whether or not it will make any changes to this policy. Any such policy changes would be presented to the Board of Commissioners for approval.
2	Elbert Tavon Briggs <purpletavon@gmail.com>	<p>Section I: Introductions Rental Assistance Demonstration (RAD) Program</p> <p>As a resident at the Kenmore Apartments, I attended one of the CHA stake holder meetings that were held in October 2013. This notification states that in June 2015, CHA closed its first RAD transaction for Fannie Emanuel Senior Apartments in December 2015, and CHA will move forward with RAD implementation for the entire (CHA) portfolio.</p> <p>Does this mean that Kenmore Senior Apartments, 5040 North Kenmore Ave, can expect the implementation in FY2016? As I understand the plan could increase rents that will be phased in over a 5 year period?</p>	CHA is looking at all senior designated buildings in the CHA portfolio for potential transition to RAD Project-Based Vouchers (PBVs). Most, if not all, of the senior designated portfolio and a few mixed-income properties will transition to RAD. CHA plans to hold another resident meeting at Kenmore Apartments in the 2nd quarter of 2016 before any conversion to RAD. Under RAD, residents will continue to pay 30% of their income towards rent. The only increase will be for residents who are on "flat rent." The rent for those residents will increase over a five year period until it reaches 30% of income. CHA has approval for RAD conversion for nearly 11,000 units, not CHA's entire portfolio.
3	Elbert Tavon Briggs <purpletavon@gmail.com>	Uniform Physical Condition Standards (UPCS) for RAD Properties (2016-04) Will this change the inspection criteria ? Will this increase or decrease physical inspections ?	UPCS is the present inspection standard used for public housing units. RAD, as well as other Project-Based Voucher programs, uses Housing Quality Standards (HQS) for inspections, which is considered as a less stringent inspection standard. In order to keep consistency through the portfolio, CHA is asking HUD to continue to use the public housing inspection standard. The current frequency of inspections is expected to remain. Per HUD regulations, CHA is generally required to conduct inspections not less than biennially (or at least every two years).

4	Elbert Tavon Briggs <purpletavon@gmail.com>	<p>Appendices: Rental Assistance Demonstration Program</p> <p>The notification states that upon conversion to Project-Based Vouchers, CHA will adopt residents rights, participation, waiting list and grievance procedures listed in Section 1.6.C &amp; 1.6.D of PIH Notice 2012-32, ... with all fair housing and civil rights requirements ...</p> <p>Does this mean that senior housing properties (i.e. Kenmore Apartments 5040 North Kenmore Ave) will openly operate under the principle the of Secretary of Housing &amp; Urban Development Resident Rights and Responsibilities brochure &amp; other 14th Amendment Equal Protection requirements as spelled out in Title VI?</p> <p>After this (5 year) phase-in period, impacted residents will transition to biennial re-examinations (every 2 years) or triennial re-examinations (every three years) ...</p> <p>Is this stating that after the phase in, CHA residents will be then required to recertify their incomes every 2 or 3 years, as opposed to the current annual (one year) income recertification requirements?</p>	<p>CHA will comply with all applicable HUD regulations. Residents that are currently paying 30% of household income towards rent will be recertified every two or three years (as applicable) after the property's RAD conversion. Residents who are currently paying flat rent, who will transition paying 30% of income, will be given a 5 year phase in schedule for rent increase. After this phase-in period is completed, those residents would transition to biennial (every 2 years) or triennial (every 3 years) income recertifications. If more frequent income certifications are required because of other sources of funding used for the rehabilitation of the building, like low income housing tax credits, that frequency—which may be annual—will be required.</p>
5	Elbert Tavon Briggs <purpletavon@gmail.com>	<p>Will provisions be in place to allow senior and disabled residents (SS, SSI, SSDI and Service Connected Disabled Veterans who are on fixed U.S. government regulated incomes) will be amongst those residents being required to participate in triennial re-examinations (every three years)?</p>	<p>In FY2014, CHA received HUD approval to use MTW authority to implement triennial reexaminations for those families where all members are either elderly and/or disabled (based on HUD's definition) with fixed incomes. Eligible families who meet the criteria and had their previous reexamination in 2014 will not have another re-examination until 2017.</p>
6	Robert Whitfield <robertdwhitfield2@yahoo.com>	<p>Good morning. These are initial comments on the proposed Moving to Work (MTW) FY 2016 Plan Amendment. Page 7 of the proposed MTW amendment outlines CHA's intention to request authorization to utilize the Uniform Physical Condition Standards (UPCS) for CHA public housing converted to Section 8 under the Rental Assistance Demonstration</p>	<p>CHA is not requesting a direct waiver of 24 CFR 982. As a condition of receiving HAP subsidy, and as confirmed in the RAD notice PIH-2012-32 (HA), REV-2, Section 1.6.B.9, all units under a HAP contract must be inspected. A comparison of UPCS and HQS has shown that UCPS is generally more stringent than HQS. To clarify that CHA intends to use the more stringent standard to</p>

	<p>(RAD) program.</p> <p>The language on page 7 suggests that CHA's intends to request that HUD waive the regulations at 24 CFR 982, Subpart I governing the inspections of Section 8 Project Based units. It is not clear why CHA is requesting a waiver of 24 CFR 982 as a condition for utilizing UPCS inspection standards for RAD converted CHA properties. It appears that the regulations governing the UPCS inspection standards already apply to Project Based units. See attached the regulations for UPCS inspection standards. Further, even if the UPCS regulations will not apply to CHA public housing units converted under RAD. there do not appear to be any Federal statute, regulation and or HUD policy and or rule that would prevent CHA from utilizing UPCS inspection standards, in addition to the current regulations (24 CFR part 982) governing inspections for Section 8 Project Based units. If so, then it appears that the only purpose of the CHA proposal is to waive the inspection and enforcement provisions that are contained in 24 CFR Part 982; many of which are not contained in the UPCS regulations.</p> <p>CHA should explain why it cannot utilize the UPCS inspection provisions, and continue to be subject to the Project Based regulations at 24 CFR Part 982. A review of the HUD RAD website did not disclose other PHAs who have requested a waiver of 24 CFR part 982.</p>	<p>inspect units, in the proposed FY2016 MTW Annual Plan Amendment, CHA has requested HUD authorization to move forward with UPCS as the standard inspection criterion to ensure consistency across the portfolio of units CHA oversees. CHA will continue to adhere to all applicable regulations related to the evaluation and frequency of unit inspections.</p>
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7	Myra King	<p>Now, as a past commissioner, I know that – I want this recorded – I know that a lot of times what you have written and I'm not saying it does – say it for – it does seem to me – I will say that more than before that you're trying to work with us. So let me say this before I get into what I'm going to say. But as a past commissioner it seems as though a lot of the – you have briefly summarized a lot of the issues, what I guess you consider or your staff considers to be main points. The points that are not within the document are the ones that I'm worried about because I haven't had time to read it because you just put it out on the 19th. Intentionally or unintentionally, that was done.</p> <p>When you look from CHA's perspective, you might have been thinking well, something is coming up next week we don't want to clash. I would rather you guys say okay, we will give you more time than give us less, and at least if it comes down to it, you have done all you can. But it seems as though this is something that we have had as residents all the time. It could be perceived that our time was cut short for reasons other than the good, the betterment of the people. That's the first thing.</p>	<p>CHA continuously works to improve and adapt the public comment process as necessary and has recently increased resident notification through on site distribution, mailings and email blasts. CHA published official notice of the public comment period through ads in the Chicago Defender, Chicago Sun-Times and Hoy newspapers as well as by posting information on CHA's website. CHA distributed information through the Central Advisory Council, property management, service providers and HCV satellite offices. Public hearings are not the only medium for comment during the public comment period. Comments may be provided through email, phone or mail.</p>
8	Myra King	<p>Second thing, you talked about work requirements. CAC has been talking about the work requirements for years. For example, 47 percent of youth have no jobs, but you present this work requirement within our lease so when they don't get a job, we can be evicted. That's not fair. It seems as though the work requirement should be geared to what's happening now and it's not.</p> <p>You talk about RAD. My point remains that – the things that are not – the things that are not within this briefing is what I'm worried about. The work requirement seems to be</p>	<p>Since the work requirement was initiated, no residents have been evicted. As of the end of 2015, 53.4% are compliant with the work requirement, 23.4% are exempted from the work requirement, and 18.4% are in Safe Harbor. This proposal is to increase the Safe Harbor period from 90 days to 180 days to allow for more time as well as to require services so that residents needing to get into school, a training program, or employed have ample time to do so.</p>

		geared towards there are no jobs, nobody is getting raises, and I can stand to be evicted because my son or my grandchild, if he's on my lease, can't find work. That's unfair, and again, I would rather you give us more time than not give us less.	
9	MYRA KING	Perhaps if you have the leadership at the table, it may come out and look better, but we weren't at the table when this was done. That's another issue that I have. You did it -- not you per se, but your staff did it from their perspective. We are the ones in it. Our perspective is totally different. I would appreciate having had a seat at the table. When I said that 47 percent are not working and I can get evicted, you might not have thought of that. Your staff is working. They're not thinking about things like that because they're working but we are. Face us. It was not intentional.	Thank you for your comment.
10	Francine Washington	I want to piggyback on what she said. I like the fact that we asked questions about the EID. Working with HUD, but you wrote this up. We are talking about Safe Harbor. I don't care, Safe Harbor is still not going to work. We should have sat at the table. We talk about Safe Harbor all the time. They knew what we were going to say, just what we will say. They don't use it to search it. If you don't use it to search it, you can't write the plan, how will it work? They should have asked us. It won't work. You tell me to go to Safe Harbor. I get the action plan with my FamilyWorks. I report to management with my FamilyWorks, report to management, have an action plan. I have 90 days. I have another action plan. Who follows up in between to make sure?	Thank you for your comment. The purpose of this change is to promote more accountability on all parties and to provide more time to enroll in a program or school. If there are mandatory services, then it will be the responsibility of the provider to make sure that there is a reasonable agreed upon plan.

11	Francine Washington	I do one time your action plan. Who follows up to make sure that I follow through on my action plan? Who's trying to help me do the action plan? Who's going to contact management? You tell me 90 days. Family Works gets paid to do a job. If I don't contact them, it's your responsibility. Who's going to follow through and make sure? This is follow through. It's not working. Every time –not trying to be funny – every time they try to do something for us, they give us what they think we should have instead of what we need. They don't bother to ask what do you think about this? What are you all going? They never do that. They are good at black and white when it comes to limitation.	Prior to implementation, CHA will sit down with the CAC to discuss the operational procedures as to how this will work.
12	Francine Washington	It ain't going to work. It ain't never worked. It's not your fault but they don't believe fat meat is greasy. It won't work. You will spin all your wheels going to HUD. It ain't worked. They just put a time limit. It still won't work. We are talking from experience.	Thank you for your comment.
13	Myra King	In the future, put us at the table, ahead not behind.	Thank you for your comment.
14	Jackee Paige	Going back off what Francine said, they sent notices saying comment period for MTW. There was no details. I had to stop at the HCV office and then she still – she still didn't have it out for residents to see what was going on. She still had it in the envelope when the mailman dropped it off from when to who knows when? So once again, and I keep telling them that this constantly happens when the comment period comes around, when amendments to policies and any changes come. Are we going to see – I see you here. I see you pretty much explaining, but the process in these HCV offices still remains the same no matter how much you talk to them. Why is that?	CHA continuously works to improve and adapt the public comment process as necessary and has recently increased resident notification through on site distribution, mailings and email blasts. CHA will work to ensure that proposed documents are readily available at designated locations.

15	Unknown Woman	<p>I just want to say something about Family Works. I feel Family Works needs to start going door to door to bring their residents out, and you know, pretty much make themselves active with their residents in order for them to know what's going on. Because I know -- I noticed a lot of paperwork they passed out and they put in the doors do not really get to the residents. And I notice that when I was passing out paperwork for RIPKA, because they were passing out the same paperwork, but the paperwork was flying all over the community because it was stuck in the screens and it flew away. So I was passing it out. I was opening it up in the screen doors and put it in and letting them know to come out to the meeting. But how would you know that your resident got the information if you don't literally speak to these people one on one? You don't know.</p> <p>A lot of stuff just sits in the door because a lot of doors I went to, it was just laying on the ground.</p>	Thank you for your comment. CHA will remind all service providers to make direct contact with residents and not leave flyers lying about.
16	Francine Washington	<p>Can I answer her question please? Family Works used to do what you call outreach and engagement when we had a few more dollars. For five years we did outreach for engagement and resident services at CAC. We were good at what we did. We were very good. We had Family Works provide us on the property, five years, still had two residences, a couple of them go to the agency-owned property. We were so good, we made FamilyWorks look bad. I mean, nobody never knocks on their door or goes to their office but they will get paid anyway. They were -- that was taken out by design. How does it work for us and do not service us?</p> <p>They don't have to do that. They took</p>	Thank you for your feedback. CHA will meet with you to discuss your comments.

		that part out.	
17	Unknown Woman	But they don't because they don't know who is on the property. There are some good ones, but a lot don't go door to door because it's an inconvenience to them. They are not giving out the information to the residents.	Thank you for this feedback. CHA will remind FamilyWorks providers of their responsibility.
18	Jackee Paige	First, I'm a voucher holder. Now CAC, from what I understand, was traditional housing, so are we going to have voucher holders at the table? Because I don't have to be at the table. I would like to be at the table.  I'm allowed to be at the table?	Under the regulations, the Central Advisory Council (CAC), as the jurisdiction-wide resident organization, serves as the Resident Advisory Board for public housing residents. The HCV Program has, and will continue to have, the HCV Participant Council to represent HCV participants, which per HUD regulations serves as the Resident Advisory Board for HCV Participants. CHA is in the process of instituting new members for the HCV Participant Council and is currently reviewing all applications submitted. This does not prohibit the CAC from inviting anyone the CAC wishes to attend their meetings.
19	Jackee Paige	Now the second thing, reducing -- you're talking about reducing the per unit subsidy cost of participant households. Can you touch on this? And also the one about households transitioned to self sufficiency? Could you get to the meat of what this is?	As part of MTW reporting requirements, CHA must track certain metrics, developed by HUD, when it proposes uses of MTW flexibility. In the FY2016 MTW Annual Plan Amendment, CHA is proposing changes to the work requirement that require HUD approval to use additional MTW flexibility. For the work requirement, CHA is required to track the amount of subsidy for public housing residents as a measure of the impact of this activity. However, CHA is not proposing changes to this metric for this activity.
20	Francine Washington	The purpose of the self sufficiency, if you're not working or if you have a job that's minimum wage and you go -- you get a big raise, you get a job that goes up to \$600, you will have to pay that \$675 a month, only \$75 will go to your rent, and the \$600 will be put into escrow. It depends on whether you work or not work, making a lot of	Thank you for your comment.

		<p>money. Self sufficiency will benefit you. It's about the money and the job. I'm on the board. I love that program.</p> <p>You have to have a job. Rents go up, and they move towards self sufficiency, you get it all tax free.</p>	
21	Jackee Paige	<p>What you're saying is, we are taking it – to transition? Because that's what I already understood the program to be. I'm trying to understand what the changes are.</p> <p>You have this in here as a change to MTW. I'm trying to understand what you're changing.</p>	<p>As part of MTW reporting requirements, CHA must track certain metrics, developed by HUD, when it proposes uses of MTW flexibility. In the FY2016 MTW Annual Plan Amendment, CHA is proposing changes to the work requirement that require HUD approval to use additional MTW flexibility. For the work requirement, CHA is required to define and track a metric related to self-sufficiency, which is defined as having all applicable adults in a household compliant with the work requirement, as a measure of the impact of this activity. However, CHA is not proposing changes to this metric for this activity.</p>
22	Francine Washington	<p>Making sure they can benefit. They don't know whether they can use it or not since it's going under RAD.</p>	<p>Thank you for your comment.</p>
23	Jackee Paige	<p>SS-8, households transitioned to self sufficiency. Page 4 of 13. You want more people to participate? How are you going to increase?</p> <p>How? You put it in.</p>	<p>As part of MTW reporting requirements, CHA must track certain metrics, developed by HUD, when it proposes uses of MTW flexibility. In the FY2016 MTW Annual Plan Amendment, CHA is proposing changes to the work requirement that require HUD approval to use additional MTW flexibility. For the work requirement, CHA is required to define and track a metric related to self-sufficiency, which is defined as having all applicable adults in a household compliant with the work requirement, as a measure of the impact of this activity. However, CHA is not proposing changes to this metric for this activity.</p>
24	Francine Washington	<p>Self sufficiency, that's two different things we're talking about. This is something Family Works should be doing.</p>	<p>Thank you for your comment.</p>

25	Delores Fitzpatrick	<p>I live in mixed income housing. The only reason I got this, and I got it Friday. We didn't get any of this information. They just said – they did not come knocking on our door. I pay my rent to CHA. I have a person there that I call getting what I need to get from the – from the association. We can't keep up with all of this if we don't know what is happening.</p> <p>So could we make some kind of way, maybe Francine or somebody, so we can come to the meeting? Because you have a lot of mixed income people trying to find out what's happening. Management is not giving it to us. As a matter of fact, it's like we are fighting management, and it should not be the case.</p>	<p>CHA continuously works to improve and adapt the public comment process as necessary and has recently increased resident notification through on site distribution, mailings and email blasts. CHA mailed notices of the public comment period to residents in mixed-income sites. CHA will continue to look at ways for residents to obtain information, such as restoring outreach in the FamilyWorks contracts. In addition, the Office of the Ombudsman is available to assist mixed-income residents with their concerns.</p>
26	Francine Washington	They don't want their residents stirred up.	Thank you for your comment.
27	Virgil Mathis	<p>I work for the Department of Defense, and I'm very excited about this program because I'm working towards getting 25 to 100 homeless and disabled veterans into manufacturing. The Department of Defense invested seven million dollars, and I have worked for them since day one. So I want to work with you on that.</p> <p>I think something good will come out of it.</p>	Thank you for your comment.
28	Delores Fitzpatrick	<p>I live at mixed income housing. When we first moved in, we were told that – we were attending the association meeting regularly. I was told in the last three or four years that we can't go to the association meeting. The management that we have, they can't advocate for us. I look – I looked around and got my car towed even though I had a piece of paper saying that was my spot to park. Well, they said a new</p>	<p>Currently, only property management and/or CHA staff attend association meetings on behalf of CHA owned units. You are encouraged to request a copy of the association meeting notes to get an understanding of what is being discussed at the meetings.</p>

		association is here. Excuse me, we didn't know this. You all as managers did not tell us, and I'm thinking right now that management, you cannot advocate for me. I need to go to these meetings and see what the association is saying or what they will do so that we can put that -- look at what we need to do.	
29	Virgil Mathis	Lake Part Crescent, and I just want to know, if we can go back to how we started out, where we the residents of -- attended the meetings just like everybody else. Nobody knew if we were renters or owners. But they had changed it. Every time I guess they get a new association in, they want to look to see who they have as owners or who is a renter.	Currently, only property management and/or CHA staff attend association meetings on behalf of CHA owned units.
30	Francine Washington	Renters, homeowners, condo owners, guess what? CHA paid the same assessment fee for everybody. So I'm glad you're here to let them know, cut us in or cut us out. As a matter of fact, most of these associations don't even put -- there are assessment fees in. They pay CHA dollars but they know CHA dollars is coming faithfully every month.	Thank you for your comment.
31	Margaret Hughes	Hello, I'm from Robert Taylor and I'm speaking on as far as, I look at myself as a product of CHA housing. And it's real messed up, the realty. Habitat was there. They're gone. Now Woodlawn is there and Habitat is ridiculous. It really is It's so sad. Habitat used to be there. Now, Woodlawn has took it and it's like it's going down and down and down. Dearborn. It's really messed up. And it's just really bad how we have lost our value for each other, and the things we do to each other. It's bad. It must be a stop. It has to stop somewhere and it has to start somewhere. It's about -- it's not only that, it's that they just corrupt. Everything is so corrupt and sad.	Thank you for your comment.

32	Francine Washington	<p>I want to piggyback. Management is messed up, but you know what I think? Before you guys -- if it don't work when we had full staff, how is it going to work at half mast? They designed it to fail. They had no regard or respect for residents. I don't blame management. You need to stop pointing fingers. We don't have a full staff so I blame both of them. Management tries to work with what they got. We know they are not going to make it. CHA says we give you this, we gave you that. It shouldn't have been that way. Don't blame management until you know what they working with.</p>	Thank you for your comment.
33	Elizabeth Rosenthal <erosenthal@afchicago.org>	<p>CHA proposes to dispose of the Near North High School baseball field to the Chicago Park District for use as a park. While the LAC understands the importance of green space for the community, which includes the public housing families that hope to return to the neighborhood, CHA should hold off on disposing of this land until CHA has shown that it has made more progress toward replacing the minimum 1800 subsidized units that it is obligated to return to the Near North Redevelopment Area (NNRA). In 2000, CHA signed a Consent Decree with the CGLAC that designated the Near North High School site as a location for replacement housing. As one of the largest parcels proposed for replacement housing (8.7 net acres), the parties estimated that 115 units of public housing would go on the site (when the Consent Decree still placed a limit of 30% public housing on any Consent Decree site). While an old Request for Proposals that was issued and withdrawn in 2001 requested a proposal for green space, it only requested two acres; the site that CHA now plans to dispose of is approximately four acres- almost half the site. Although CHA must return at least 1800 units to the NNRA, in the years</p>	<p>In addition to City requirements to provide for green space, CHA believes a park at this site benefits CHA families and the families in the community. Having a public park maintained and programmed by the Chicago Park District, allows this site to be part of the larger community. Now that the parties have amended the court orders and consent decrees, progress for the area is moving forward. The recent RFP released for the site is evidence of the CHA's commitment and dedication to return units to the area. In fact, in the RFP, CHA and the City of Chicago strongly encouraged developers to maximize the number of public housing units on these sites. CHA is prioritizing needed housing and wishes to create a sustainable community for CHA families returning as well as wanting to move to the area. The disposition of the Near North High School baseball field will not diminish units but will supply needed green space for all families.</p>

		<p>since CHA embarked on the Plan for Transformation, it has only returned a few hundred units to the area through rebuilding and acquisition. Displaced CHA residents have been waiting too many years for replacement housing in the revitalized Cabrini Green neighborhood. We want to ensure that there is adequate land to build the housing that they need. CHA now has a Request for Proposals out for the parcels including the Near North High School site as well as two other parcels. CHA should wait to dispose of the site until the Near North Working Group has had a chance to review and approve plans for these parcels, to ensure that CHA is on the right track to meeting its (minimum) 1800-unit promise. The CGLAC reminds CHA that it took more than 13 years to transfer the land from the Chicago Public Schools to the CHA. CHA does not need to be in such a rush to transfer the land to the Park District. CHA should be prioritizing housing, not a baseball field. Until CHA can show that it is doing so, the CGLAC objects to the disposition of the Near North High School baseball field.</p>	
34	Mr. Smith	<p>Some things I had no knowledge of. You know, and being blind, you're kind of ignorant to the facts, you know. So I'm just trying to -- will that have an affect on the thing that is transpiring, the dates, for the elderly that is here?</p> <p>There will be a cut?</p>	Thank you for your comment.
35	Dolan Hinton	<p>What is this Earned Income Disallowance? What is that about? For how long?</p>	Earned Income disallowance enables a resident to hold at their current rent when they obtain a job for 12 months and then the rent will increase by half the amount it should be in the second 12 months. Residents have 24 months of EID within a 4-year timeframe.

36	Robert Whitfield <robertdwhitfield2@yahoo.com>	<p>CHA had two public hearings during the 30 day comment period (February 19th to March 21st). This is better than prior CHA policy where CHA generally had one public hearing for CHA draft documents, to include draft MTW Amendments, draft leases, draft Section 8 Administrative Plans, etc. However, as CHA points out on its website, the CHA Plan for Transformation is the largest and most complex in the history of public housing. CHA is also the largest MTW agency in the nation. Therefore, CHA should adopt a firm policy of having more public hearings on its draft documents so that a broad spectrum of residents and participants in the CHA Section 8 Voucher program can participate in the public hearing process. CHA should also expand the public hearing time period even though the HUD approved MTW Agreement does not require it. There is nothing to prevent CHA from expanding the public comment period to 45 days instead of the customary 30 day period. The Maywood, Illinois PHA is small voucher only PHA with less than 500 Section 8 vouchers. It always has a thirty day public comment period, as do almost all other small PHAs. It is concerning that CHA, with the largest most complex MTW Plan in the nation, has the same thirty day comment period as the Maywood PHA and other small PHAs. This is especially disturbing given the alternatives readily available for CHA to have additional public hearings, and to expand the public hearing comment period.</p> <p>For example, the CHA Board of Commissioners can adopt a fixed policy that all CHA Board meetings will also be an opportunity for public comments on and CHA draft documents that are issued for public comment. CHA can also have a policy that fixed monthly resident meetings, such as the Senior Housing Advisory</p>	<p>CHA continuously works to improve and adapt the public comment process as necessary and has recently increased resident notification through on site distribution, mailings and email blasts. CHA published official notice of the public comment period through ads in the Chicago Defender, Chicago Sun-Times and Hoy newspapers as well as by posting information on CHA's website. CHA distributed information through the Central Advisory Council, property management, service providers and HCV satellite offices. Public hearings are not the only medium for comment during the public comment period. Comments may be provided through email, phone or mail.</p>
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		<p>Council (SHAC), and the monthly Central Advisory Council (CAC) Tenant Services meetings. The CHA already provides a public address system for these meetings so adding these as public hearing dates and sites would not be burdensome.</p> <p>Also, given the recent public discussions on whether the Chicago City Council should have more involvement in CHA matters, why not have one public hearing on CHA draft documents held at a City Council Sub Committee meeting, which are generally open to the public anyway. All of the above would greatly increase public participation and involvement in the review and comment on CHA draft documents, especially the Plan documents that affect the City of Chicago as a whole, not just public housing residents and Section 8 participants.</p>	
<p>37</p>	<p>Robert Whitfield &lt;robertdwhitfield2@yahoo.com&gt;</p>	<p>The current CHA draft amendment to the FY 2016 MTW Plan includes numerous provisions related to the CHA's upcoming conversion under the new Rental Assistance Demonstration (RAD) program. HUD issued numerous documents on March 17, 2016 on the RAD program. One of the HUD RAD documents issued on March 17th provides guidance on environmental issues for PHAs converting under the RAD initiative. Given prior CHA environmental compliance issues, CHA should ensure that all RAD conversions fully comply with the attached HUD guidance. CHA is proposing the largest RAD conversion in the nation. CHA should therefore consider expanding the current public comment time period beyond March 21st to allow additional time for these new HUD issuances to be</p>	<p>CHA will comply with all applicable HUD regulations as they may apply to the RAD and project-based voucher programs.</p>

		reviewed for relevance to the CHA draft MTW amendment	
38	Robert Whitfield <robertdwhitfield2@yahoo.com>	<p>The CHA draft amendment to the FY 2016 MTW Annual Plan also references continuing resident participation through resident organizations. There are currently three CHA senior housing public housing resident organizations that are now recognized and funded by CHA as resident councils under 24 CFR Part 964. These are the Senior Housing North Local Advisory Council (LAC), the Senior Housing South LAC, and the Senior Housing Central LAC. CHA is also funding the Henry Horner LAC, and the Lathrop Homes LAC as resident councils under 24 CFR Part 964. Part 964 will not apply once all of the above public housing units have been converted from public housing to Section 8 Project Based under RAD. However, CHA has committed in writing that it will continue to recognize and fund all of the above residents councils (LACs) in the same manner after these sites have been converted to project based Section 8 under RAD.</p> <p>However, the language in the CHA draft amendment to the FY 2016 MTW Annual Plan does not reference the above CHA commitment regarding these current LACs. The language in the CHA draft is extremely vague and only states that CHA will recognize current resident organizations pursuant to CHA policy and HUD regulations. CHA should insert language confirming prior CHA commitments to continue to recognize and fund all of the above</p>	All senior properties, represented by a local area council, as traditional sites, will remain represented as they are today, subject to the MTW Agreement waiver authorization for resident organizations. Lathrop and other developments that are transformed into mixed income communities will be represented in accordance with CHA's approved MTW provision for mixed income/mixed-finance communities, regardless of the timing of RAD conversion.

		<p>LACs (resident councils) in the same manner after these properties are converted under RAD, even though CHA is not required to do so under the current HUD regulations governing resident organizations after conversions under RAD. It should be noted that there is nothing in any Federal statute or HUD regulation that prevents CHA from continuing to recognize and fund these resident organizations in the same manner as the traditional CHA public housing resident organizations.</p>	
39	<p>Jeremy Bergstrom &lt;jeremybergstrom@povertylaw.org&gt;</p>	<p>Section III, p. 2 – Public Housing Work Requirement (2009-02) We remain opposed to a public housing work requirement, and oppose the proposed changes to require participation in FamilyWorks as a condition of Safe Harbor. CHA has not demonstrated that FamilyWorks has sufficient staffing resources to provide meaningful services to all who would be affected by this policy. We are concerned that this requirement will simply become both a trigger and method of lease enforcement, instead of a true benefit to the household.</p>	<p>Thank you for your comment. As of the end of FY2015, only 18.4% of all work eligible people subject to the requirement are in Safe Harbor. CHA does have the capacity to address the needs thru Family Works Providers. Since it's inception, the work requirement has not been used to terminate leases.</p>
40	<p>Jeremy Bergstrom &lt;jeremybergstrom@povertylaw.org&gt;</p>	<p>Section III, p. 5 –Funding Supportive Services for Sponsor-Based Voucher Program (2016-02) We assume CHA will follow its procurement process to ensure the highest quality of services possible. While we do not discourage the provision of supportive services to voucher households who want them, we encourage CHA to strike an appropriate balance when it comes</p>	<p>All applicants for the sponsor-based voucher program will be required to submit a two-part application which can be found on CHA's website: <a href="http://www.thecha.org">www.thecha.org</a>. \CHA has allocated no more than 350 vouchers for this demonstration program.</p>

		to utilization of voucher funding so that as many eligible families as possible might be assisted. It is significant that CHA's estimated cost of \$4500 per family is nearly half the average HCV subsidy paid per household in 2014.	
41	Jeremy Bergstrom <jeremybergstrom@povertylaw.org>	Section III, p. 6 – Expansion of Public Housing Earned Income Disallowance Policy to CHA RAD Properties (2016-03) We support and laud CHA for implementation of this policy.	Thank you for your comment.
42	Jeremy Bergstrom <jeremybergstrom@povertylaw.org>	Section III, p. 7 – Uniform Physical Condition Standards (UPCS) Inspection Standards for RAD Properties (2016-04) We support use of UPCS as the standard at RAD developments to the extent that the UPCS standards are more stringent than HQS.	Thank you for your comment.
43	Jeremy Bergstrom <jeremybergstrom@povertylaw.org>	Appendices, p. 8 – Rental Assistance Demonstration Program We are concerned that this section reads as if CHA plans to rely entirely on borrowing funds to provide for the capital needs of RAD units it will own and operate as PBV units after a conversion.	CHA will fund an initial deposit into replacement reserves as well as fund annual deposits into reserve accounts to be used for capital needs arise. Funds will be borrowed for rehabilitation work when needed.
44	Jeremy Bergstrom <jeremybergstrom@povertylaw.org>	P. 12 – Resident Participation and Funding Please clarify if CHA will continue to fund and recognize the LAC's and/or other resident organizations pursuant to existing mechanisms, and/or pursuant to the guidance in HUD Notice PIH 2012-32 Rev. 2.	All senior properties, represented by a local area council, as traditional sites, will remain represented as they are today, subject to the MTW Agreement waiver authorization for resident organizations. Lathrop and other developments that are transformed into mixed income communities will be represented in accordance with CHA's approved MTW provision for mixed income/mixed-finance communities, regardless of the timing of RAD conversion.
45	Jeremy Bergstrom <jeremybergstrom@povertylaw.org>	P. 13 – Earned Income Disregard CHA should allow for a proportional phase-in of increased rent for families concluding a term of EID, so that families are not discouraged from pursuing employment and participating in EID.	Thank you for your comment.

**Public Comment Info and Grid – FY2016 MTW Annual Plan Amendment (No. 2)**

Prior to submission of the FY2016 MTW Annual Plan Amendment No. 2 for CHA Board approval, a 30-day public comment period was conducted from May 18 through June 17, 2016. CHA held two public hearings during the comment period, on June 2 (CHA Headquarters, 60 E. Van Buren) and on June 8 (Family Investment Center, 4859 S. Wabash). A total of 3 people participated in these hearings. The following table includes public comments and CHA responses.

<b>Proposed FY2016 MTW Annual Plan Amendment (2)</b>			
<b>Public Comment Period: May 18 - June 17, 2016</b>			
<b>Comment #</b>	<b>Individual/Organization</b>	<b>Comment</b>	<b>CHA Response</b>
1	Joseph Watkins	My concern was about the additional disposition activity for the – the disposition activity. Anyway, I was asking what is the process on that? How does that work? You say you all were going to submit – you made a comment about you were going to submit to HUD. Did you want to move forward in doing what with them?	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.
2	Unknown	I would like for Kenneth Campbell to be under the RAD Program. Other senior apartment buildings should be included too.	CHA has included Kenneth Campbell as well as multiple other senior properties as participants in the RAD program, as part of a previous FY2016 MTW Annual Plan Amendment, which is pending HUD approval.
3	Robert Whitfield	CHA should consider ending the current policy for applications for scattered site units. CHA started the policy in part to address continuing resistance to the scattered fire program in non minority areas; and also because of the possibility that minorities would apply in greater numbers for new scattered site units and complicate efforts to provide integrated public housing.  These are not valid reasons for continuing this decades policy. CHA should petition the Gautreaux court to issue an order ending the policy established in 1990, so all scattered site units are available to applicants and tenants seeking transfers.	Thank you for your comment.
4	Joseph Watkins	My name is Joseph Watkins, and I'm here today just following up on the process to follow how it's going, and to let you guys	The FY2016 MTW Annual Plan Amendment will be approved by CHA's Board in July. After

		<p>know I want to be a part of it. I think it's a good thing. How long is it going to take this process?</p>	<p>Board approval, CHA will submit the annual plan amendment to HUD for approval. There is no set timeline for HUD approval, however CHA estimates approximately 90 days.</p>
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***Description of Planned or Ongoing PHA-Directed Evaluations of the Demonstration***

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

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

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

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

Part E: Summary		PIHA Name: CHICAGO HOUSING AUTHORITY		Grant Type and Number Capital Fund Program Grant No: IL06P00250112 Date of CFP: 3/12/2012		Replacement Housing Factor Grant No:		FY of Grant: 2013	
Type of Grant		Reserve for Disasters/Emergencies		Revised Annual Statement (revision no: )		Total Actual Cost <sup>1</sup>		Expended	
Performance and Evaluation Report for Period Ending:		Final Performance and Evaluation Report		Total Estimated Cost		Obligated			
Line	Summary by Development Account	Original	Revised <sup>2</sup>	Obligated	Expended				
1	Total non-CFP 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—Nonseparable								
12	1470 Non-dwelling Structures								
13	1475 Non-dwelling Equipment								
14	1485 Demolition								
15	1492 Moving to Work Demonstration								
16	1495.1 Relocation Costs								
17	1499 Development Activities <sup>4</sup>								
18a	1501 Collateralization or Debt Service paid by the PIHA								
18b	9000 Collateralization or Debt Service paid Via System of Direct Payment								
19	1502 Contingency (may not exceed 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								

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

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

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<b>Part I: Summary</b>						
PIA Name: <b>CHICAGO HOUSING AUTHORITY</b>	Grant Type and Number Capital Fund Program Grant No. IL08P00250112 Date of CFPP: 3/12/2012					
Replacement Housing Factor Grant No.:						
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:	<input type="checkbox"/> Reserve for Disasters/Emergencies					
<input type="checkbox"/> Revised Annual Statement (revision no: )						
<input type="checkbox"/> Final Performance and Evaluation Report						
Line Summary by Development Account	Original	Total Estimated Cost	Revised <sup>2</sup>	Obligated	Total Actual Cost <sup>1</sup>	Expended
Signature of Executive Director	Date	Signature of Public Housing Director	Date			
<i>[Signature]</i>		<i>[Signature]</i>	5/11/2012			









Annual-Statement/Performance and Evaluation Report  
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 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
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**Part I: Summary**

PIA Name: CHICAGO HOUSING AUTHORITY

Grant Type and Number: Replacement Housing Factor Grant No. IL06R002501

Capital Fund Program Grant No: 2013

Date of CFPP: 3/12/2012

FFY of Grant: 2012

FFY of Grant Approval: 2012

Line	Summary by Development Account	Original	Revised <sup>2</sup>	Obligated	Total Actual Cost <sup>1</sup>	Expended
1	Total non-CFP 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 I Dwelling Equipment—Nonseparable					
12	1470 Non-Dwelling Structures					
13	1475 Non-Dwelling Equipment					
14	1485 Demolition					
15	1497 Moving to Work Demonstration					
16	1495 I Relocation Costs					
17	1499 Development Activities <sup>4</sup>					
18a	1501 Collateralization or Debt Service paid by the PIA					
18b	9000 Collateralization or Debt Service paid Via System of Direct Payment					
19	1502 Contingency (may not exceed 8% of line 20)					
20	Amount of Annual Grant: (sum of lines 2 – 19)	\$12,416,998				
21	Amount of line 20 Related to LBP Activities					
22	Amount of line 20 Related to Section 504 Activities					
23	Amount of line 20 Related to Security – Soft Costs					
24	Amount of line 20 Related to Security – Hard Costs					
25	Amount of line 20 Related to Energy Conservation Measures					

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PFIAs with under 250 units in management may use 100% of CFP 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  
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Part I: Summary		PHA Name: CHICAGO HOUSING AUTHORITY		Grant Type and Number Capital Fund Program Grant No. _____ Date of CFFP: 3/12/2012		Replacement Housing Factor Grant No. 1106R00250		FFY of Grant: 2013 FFY of Grant Approval: 2012	
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period-Ending:		<input type="checkbox"/> Reserve for Disasters/Emergencies		<input type="checkbox"/> Revised Annual Statement (revision no. _____) <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Original	Total Estimated Cost	Revised	Obligated	Total Actual Cost	Expend		
Signature of Executive Director		Date		Signature of Public Housing Director		Date			

*[Handwritten signature: S. STEIN]*  
 Date: \_\_\_\_\_  
*[Handwritten signature: Stephen H. ...]*  
 Date: 5/11/2012









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  
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 Expires 4/30/2011

Part I: Summary

PIHA Name: <b>CHICAGO HOUSING AUTHORITY</b>		Grant Type and Number Capital Fund Program Grant No: Date of CFPP: 3/12/2012	Replacement Housing Factor Grant No: IL06R002502	FY of Grant: 2013			
Type of Grant: <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Reserve for Disasters/Emergencies		<input type="checkbox"/> Revised Annual Statement (revision no: )			
Line		Summary by Development Account	Final Performance and Evaluation Report				
1	Total non-CFP Funds		Original	Total Estimated Cost	Obligated	Total Actual Cost <sup>1</sup>	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 I Dwelling Equipment—Nonexpendable						
12	1470 Non-dwelling Structures						
13	1475 Non-dwelling Equipment						
14	1483 Demolition						
15	1492 Moving to Work Demonstration						
16	1495.1 Relocation Costs						
17	1499 Development Activities <sup>4</sup>						
18a	1501 Collateralization or Debt Service paid by the PIHA						
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment						
19	1502 Contingency (may not exceed 3% of line 20)						
20	Amount of Annual Grant: (sum of lines 2 – 19)		\$23,555,209				
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						

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

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

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<b>Part I: Summary</b>	
PIA Name: <b>CHICAGO HOUSING AUTHORITY</b>	Grant Type and Number Capital Fund Program Grant No: _____ Date of CFPP: 3/12/2012
Replacement Housing Factor Grant No: IL06R002506	
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:	<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report
Line Summary by Development Account	Total Estimated Cost
Signature of Executive Director	Signature of Public Housing Director
Date	Date
	Obligated
	Total Actual Cost
	Expended









2013 Capital Grants

U.S. Department of Housing and Urban Development  
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Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

Part I: Summary		Grant Type and Number Capital Fund Program Grant No: IL06P00250113 Date of CFFP: 9/9/2013		Replacement Housing Factor Grant No:		FFY of Grant: 2014 FFY of Grant Approval: 2013	
PIIA Name: CHICAGO HOUSING AUTHORITY		Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: Summary by Development Account		<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report			
Line	Original	Revised <sup>1</sup>	Total Estimated Cost	Obligated	Total Actual Cost <sup>1</sup>	Expended	
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						
17	1499 Development Activities <sup>4</sup>						
18a	1501 Collateralization or Debt Service paid by the PIIA						
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 I BP Activities						
22	Amount of line 20 Related to Section 504 Activities						
23	Amount of line 20 Related to Security - Soft Costs						
24	Amount of line 20 Related to Security - Hard Costs						
25	Amount of line 20 Related to Energy Conservation Measures						

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

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

U.S. Department of Housing and Urban Development  
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<b>Part I: Summary</b>		FFY of Grant: 2014 FFY of Grant Approval: 2013	
PHA Name: <b>CHICAGO HOUSING AUTHORITY</b>		Grant Type and Number Capital Fund Program Grant No: IL06P00250113 Date of CFFP: 9/9/2013 Replacement Housing Factor Grant No:	
Type of Grant <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	
Reserve for Disasters/Emergencies <input type="checkbox"/>		Total Estimated Cost:	
Summary by Development Account		Revised:	
Signature of Executive Director <i>[Signature]</i> Public Housing Director		Obligated Signature of Public Housing Director <i>[Signature]</i> Executive Director	
Date: 9-9-2013		Date: 8/24/13	
Original		Total Actual Cost:	
Expended		Expended	









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Capital Fund Financing Program

Part I: Summary		PHA Name:	Grant Type and Number Capital Fund Program Grant No: Date of CFP: 9/8/2013	Replacement Housing Factor Grant No: IL08R002501	FFY of Grant: 2014 FFY of Grant Approval: 2013
CHAGO HOUSING AUTHORITY					
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report					
Summary by Development Account					
Line	Description	Original	Revised <sup>1</sup>	Obligated	Total Actual Cost <sup>1</sup>
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) <sup>2</sup>				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465 1 Dwelling Equipment - Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495 1 Relocation Costs				
17	1499 Development Activities <sup>3</sup>				
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)	\$9,451,933			
21	Amount of line 20 Related to I BP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

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

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Annual Statement/Performance and Evaluation Report  
Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
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<b>Part I: Summary</b>	
PHIA Name: <b>CHICAGO HOUSING AUTHORITY</b>	Grant Type and Number Capital Fund Program Grant No: Date of CFFP: 9/9/2013
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:	Replacement Housing Factor Grant No: IL06R002504 FY of Grant: 2014 FY of Grant Approval: 2013
<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending:	<input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report
Summary by Development Account	Total Estimated Cost
Signature of Executive Director Mike Hovav, Director	Signature of Public Housing Director Charles Hovav
Date 9-9-13	Date 8/24/13
Original	Obligated
Revised	Expended
Total Actual Cost	Total Actual Cost









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

Part I: Summary		Grant Type and Number Capital Fund Program Grant No: Date of CFFP: 9/9/2013	Replacement Housing Factor Grant No: IL06R0025024	FFY of Grant: 2014 FFY of Grant Approval: 2013
PHA Name: CHICAGO HOUSING AUTHORITY				
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: Summary by Development Account				
<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report				
Line	Original	Revised <sup>1</sup>	Obligated	Total Actual Cost <sup>1</sup> Expended
1	Total non-CFP 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	\$21,124,978		
17	1499 Development Activities <sup>4</sup>			
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)	\$21,124,978		
21	Amount of line 20 Related to LRP Activities			
22	Amount of line 20 Related to Section 504 Activities			
23	Amount of line 20 Related to Security - Soft Costs			
24	Amount of line 20 Related to Security - Hard Costs			
25	Amount of line 20 Related to Energy Conservation Measures			

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

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

U.S. Department of Housing and Urban Development  
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<b>Part I: Summary</b>	
PHA Name: <b>CHICAGO HOUSING AUTHORITY</b>	Grant Type and Number Capital Fund Program Grant No: Date of CFFP: 9/9/2013
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: Line Summary by Development Account	Replacement Housing Factor Grant No: IL06R002500 FFY of Grant: 2014 FFY of Grant Approval: 2013
<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (Revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report	Total Estimated Cost
Signature of Executive Director D. C. ...	Total Actual Cost
Date 9-9-13	Obligated Date 8/24/13
Signature of Public Housing Director E. Walker	Expended





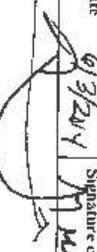




2014 Capital Grants

Annual Statement/Performance and Evaluation Report  
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
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U.S. Department of Housing and Urban Development  
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<b>Part I: Summary</b>	
PHA Name: <b>CHICAGO HOUSING AUTHORITY</b>	Grant Type and Number (Capital Fund Program Grant No. IL08-00250114 Date of CFP: 03/31/2014)
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:	<input type="checkbox"/> Reserve for Disaster/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report
Line Summary by Development Account	Total Estimated Cost
Signature of Executive Director 	Date 01/31/2014
Signature of Public Housing Director 	Date 4/17/14
Total Actual Cost	Total Actual Cost
Expended	Expended







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 Expires 4/30/2011

**Part II: Summary**

PIHA Name: **CHICAGO HOUSING AUTHORITY**

Grant Type and Number: **Replacement Housing Factor Grant No. IL06R0025026**

Capital Fund Program Grant No.: **05/13/2014**

Date of CFPP: **2015**

FY of Grant: **2015**

FY of Grant Approval: **2014**

Line	Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Rented Buildings: Summary by Development Account	Resource for Director/Enclosures	Original	Revised Annual Statement (revision no: )		Obligated	Total Actual Cost <sup>1</sup>	Expended
				Total Estimated Cost	Final Performance and Evaluation Report			
1	Total non-CFP Funds							
2	1406 Operations (may not exceed 20% of line 21) <sup>2</sup>							
3	1408 Management Improvements							
4	1410 Administration (may not exceed 10% of line 21)							
5	1411 Audit							
6	1413 Liquidated Damages							
7	1430 Fees and Costs							
8	1440 Site Acquisition							
9	1450 Site Improvement							
10	1460 Dwelling Structures							
11	1465 Dwelling Equipment - Nonseparable							
12	1470 Non-dwelling Structures							
13	1475 Non-dwelling Equipment							
14	1483 Demolition							
15	1492 Moving to Work Demonstration							
16	1495 Relocation Costs							
17	1499 Development Activities <sup>1</sup>							
18a	1501 Collateralization or Debt Service paid Via System of Direct Payment							
18b	1502 Emergency (may not exceed 8% of line 20)							
20	Amount of Annual Grant (sum of lines 2 - 17)							
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							

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.  
<sup>4</sup> K11F funds shall be included here.

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 Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development  
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Part I: Summary		CHICAGO HOUSING AUTHORITY		Type of Grant: <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		Reserve for Disaster Emergencies <input type="checkbox"/>		Original Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report		FY of Grant: 2015 FY of Grant Approval: 2014	
PHA Name: CHICAGO HOUSING AUTHORITY		Grant Type and Number Capital Fund Program Grant No: Date of CFF: 05/13/2014		Replacement Housing Factor Grant No: IL05R002502		Total Estimated Cost:		Total Actual Cost:		Date Expended:	
Type of Grant: <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		Reserve for Disaster Emergencies <input type="checkbox"/>		Original Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report		Total Estimated Cost:		Total Actual Cost:		Date Expended:	
Signature of Executive Director <i>Levy Jones</i>		Date 6-3-14		Signature of Public Housing Director <i>Michael Anderson</i>		Date 4/17/14					









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

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

**Part I: Summary**

PIA Name: **CHICAGO HOUSING AUTHORITY**

Grant Type and Number: \_\_\_\_\_  
 Capital Fund Program Grant No: \_\_\_\_\_  
 Date of CFPI: 08/13/2014

Replacement Housing Factor Grant No: L06R023014  
 FY of Grant: 2015  
 FY of Grant Approval: 2014

Line	Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:	Reserve for Disasters/Disasters	Revised Annual Statement (revision no: )	Total Annual Cost	
				Obligated	Expended
Summary by Development Account		Original	Revised	Obligated	Expended
1	Total non-CFF Funds				
2	1406 Operations (may not exceed 20% of line 21)				
3	1408 Management Improvements				
4	1418 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	1483 Demolition				
15	1492 Moving to Work Demonstration	\$5,655,098			
16	1495.1 Rehabilitation Costs				
17	1499 Development Activities - Payover				
18a	1501 Collateralization or Debt Service paid by the PIA				
18b	9999 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)	\$5,655,098			
21	Amount of line 20 Related to LDP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

1 To be completed for the Performance and Evaluation Report.  
 2 To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
 3 PIA's with under 250 units in management may use 100% of CFF Grants for operations.  
 4 RHP Funds shall be included here.







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

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

Part I: Summary		Grant Type and Number		FFY of Grant: 2016	
PHA Name: CHICAGO HOUSING AUTHORITY		Capital Fund Program Grant No: IL06P00250115		FFY of Grant Approval: 2015	
Date of CFFP: 4/13/2015		Replacement Housing Factor Grant No:			
Type of Grant	Summary by Development Account	Original	Revised <sup>1</sup>	Obligated	Total Actual Cost <sup>1</sup> Expended
Line	Performance and Evaluation Report for Period Ending:	Total Estimated Cost	Revised <sup>1</sup>	Total Actual Cost <sup>1</sup> Expended	
1	Total non-CFF Funds				
2	1406 Operations (may not exceed 20% of line 21) <sup>2</sup>				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				\$49,475,097
17	1499 Development Activities <sup>4</sup>				

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

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Capital Fund Program, Capital Fund Program Replacement Housing Factor and  
Capital Fund Financing Program

<b>Part I: Summary</b>		FFY of Grant: 2016 FFY of Grant Approval: 2015	
PHA Name: CHICAGO HOUSING AUTHORITY	Grant Type and Number Capital Fund Program Grant No: IL06P00250115 Replacement Housing Factor Grant No: Date of CFFP: 4/13/2015		
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Performance and Evaluation Report for Period Ending: _____ <input type="checkbox"/> Summary by Development Account			
Line		Total Estimated Cost	Total Actual Cost <sup>1</sup>
		Original	Obligated
18a	1501 Collateralization or Debt Service paid by the PHA		
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$49,475,097	
21	Amount of line 20 Related to LBP Activities		
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security - Soft Costs		
24	Amount of line 20 Related to Security - Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures		
Signature of Executive Director		Signature of Public Housing Director	
Date		Date	

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









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<b>Part I: Summary</b>		FFY of Grant: 2016 FFY of Grant Approval: 2015	
PHA Name: CHICAGO HOUSING AUTHORITY		Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: IL06R00250115 Date of CFFP: 4/13/2015	
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report	
Line	Summary by Development Account	Total Estimated Cost Revised <sup>1</sup>	Total Actual Cost <sup>1</sup> Expended
1	Total non-CFF Funds	Original	
2	1406 Operations (may not exceed 20% of line 21) <sup>1</sup>		
3	1408 Management Improvements		
4	1410 Administration (may not exceed 10% of line 21)		
5	1411 Audit		
6	1415 Liquidated Damages		
7	1430 Fees and Costs		
8	1440 Site Acquisition		
9	1450 Site Improvement		
10	1460 Dwelling Structures		
11	1465.1 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	\$4,407,125	
17	1499 Development Activities <sup>4</sup>		

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

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<b>Part I: Summary</b>		FFY of Grant: 2016 FFY of Grant Approval: 2015	
PHA Name: <b>CHICAGO HOUSING AUTHORITY</b>	Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: IL06R00250115 Date of CFFP: 4/13/2015		
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Reserve for Disaster/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report			
Line	Summary by Development Account	Total Estimated Cost	Total Actual Cost <sup>1</sup>
		Original	Obligated
18a	1501 Collateralization or Debt Service paid by the PHA		
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment		
19	1502 Contingency (may not exceed 8% of line 20)		
20	Amount of Annual Grant: (sum of lines 2 - 19)	\$4,407,125	
21	Amount of line 20 Related to LBP Activities		
22	Amount of line 20 Related to Section 504 Activities		
23	Amount of line 20 Related to Security - Soft Costs		
24	Amount of line 20 Related to Security - Hard Costs		
25	Amount of line 20 Related to Energy Conservation Measures		
Signature of Executive Director		Signature of Public Housing Director	
Date		Date	
		3/11/15	

<sup>1</sup> To be completed for the Performance and Evaluation Report.  
<sup>2</sup> To be completed for the Performance and Evaluation Report or a Revised Annual Statement.  
<sup>3</sup> PHAs with under 250 units in management may use 100% of CFP Grants for operations.  
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Capital Fund Financing Program

<b>Part I: Summary</b>		FFY of Grant: 2016	
PHA Name: CHICAGO HOUSING AUTHORITY		FFY of Grant Approval: 2015	
Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: IL06R00250215 Date of CFFP: 4/13/2015			
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report	
Summary by Development Account		Total Estimated Cost	Total Actual Cost <sup>1</sup>
Line		Revised <sup>2</sup>	Expended
1	Total non-CFP 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	\$12,818,026	
17	1499 Development Activities <sup>4</sup>		

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

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<b>Part I: Summary</b>		FFY of Grant: 2016 FFY of Grant Approval: 2015	
PHA Name: CHICAGO HOUSING AUTHORITY	Grant Type and Number Capital Fund Program Grant No: Replacement Housing Factor Grant No: IL06R00250215 Date of CFFP: 4/13/2015		
<input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Performance and Evaluation Report for Period Ending:		<input type="checkbox"/> Revised Annual Statement (revision no: ) <input type="checkbox"/> Final Performance and Evaluation Report	
Type of Grant		Total Estimated Cost	
<input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Summary by Development Account		Original	Obligated
18a 1501 Collateralization or Debt Service paid by the PHA 18ba 9000 Collateralization or Debt Service paid Via System of Direct Payment			
19 1502 Contingency (may not exceed 8% of line 20)			
20 Amount of Annual Grant: (sum of lines 2 - 19)		\$12,818,026	
21 Amount of line 20 Related to LBP Activities			
22 Amount of line 20 Related to Section 504 Activities			
23 Amount of line 20 Related to Security - Soft Costs			
24 Amount of line 20 Related to Security - Hard Costs			
25 Amount of line 20 Related to Energy Conservation Measures			
Signature of Executive Director		Signature of Public Housing Director	
Date		Date	

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











# Appendices

## **Appendices**

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

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

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

The local asset management program incorporates the following key components:

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

### **Program Principles**

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

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

### **Cost Allocation Approach**

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

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

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

- Executive Office
- Legal Services
- Finance

- Administration
- Asset Management
- 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**

Chicago Housing Authority (CHA) entered into a Section 504 Voluntary Compliance Agreement (VCA) with the U.S. Department of Housing and Urban Development (HUD) in May 2006. The VCA resulted from a HUD review Section 504 Compliance regarding both CHA's housing and non-housing programs. The VCA outlined a number of benchmarks that CHA had to complete in order to come into full compliance with all federal accessibility regulations and to meet the need of the local disability community eligible for its housing program. All of the units comply with the Uniform Federal Accessibility Standards (UFAS) as required by HUD. In May 2013, CHA successfully completed all of the benchmarks required in its Section 504 VCA with HUD.

Since completing the VCA, CHA continues to incorporate accessibility standards into new construction and rehabilitation, ensuring that housing is provided for people with disabilities both currently residing in CHA housing and those on its waiting lists. Whereas most housing authorities provide 5.0% and 2.0% of its housing for people with mobility and sensory impairments respectively, CHA provides 5.3% and 2.1% respectively. The CHA has exceeded its mobility requirements by making 6.1% of its housing stock accessible.

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

### **Non-Housing Programs**

CHA has a department of three staff dedicated to addressing issues of fair housing and disability in subsidized housing. The Housing Rights and Nondiscrimination Department (HRND) is responsible for bringing and keeping the entire housing authority in compliance with all applicable fair housing and disability-related regulations. HRND monitors and addresses issues of fair housing discrimination as well as issues decisions on reasonable accommodations for both public housing and Housing Choice Voucher (HCV) participants. In the past year, CHA has issued 464 decisions on reasonable accommodation requests submitted by CHA public housing residents and 1,344 decisions on reasonable accommodation requests submitted by CHA HCV participants.

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

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 and devices like grab bars, lifts, ramps, and sensory equipment, for participants who need such features for accessibility. Since its inception, CHA has provided necessary modifications to over 500 HCV participants who may otherwise not have been able to find affordable, accessible private market housing. CHA anticipates continuing this program through an intergovernmental agreement with the City of Chicago's Mayor's Office for People with Disabilities.

The CHA, under its MTW Program, issues tenant-based vouchers as part of a demonstration program to expand affordable housing choices within housing opportunity areas in the City of Chicago. In order to access housing in these

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

Additionally, CHA has partnered with Access Living of Metropolitan Chicago, a disability advocacy agency, to administer Housing Choice Vouchers to persons transitioning from institutions/nursing homes into the community. Every year, CHA delivers up to 3% of its non-targeted funding for this population. Access Living and CHA have experienced great success by transitioning over 100 formally institutionalized individuals and their families into private market housing. CHA plans to continue these efforts as well as designate units within its Property Rental Assistance (PRA) Program for the same population.

CHA developed and implemented a comprehensive fair housing testing and survey report that outlined the barriers to housing choice encountered by public housing residents and HCV participants. This report helped shape the CHA's policies and procedures and identified areas where CHA is able to remove housing impediments. CHA continues to rectify any identified impediments and revisits policies and procedures to determine if any additional changes are necessary. CHA intends to conduct additional fair housing testing in the next year.

CHA is currently working with several partners to eliminate fair housing impediments, including Access Living, The Chicago Lawyers' Committee for Civil Rights Under Law, the John Marshall Fair Housing Clinic, and the Chicago Commission on Human Relations.

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

The Chicago Housing Authority (CHA) is amending the FY2016 Moving to Work Annual Plan to reflect adjustments to the public housing developments anticipated for the Rental Assistance Demonstration (RAD) Program. Most of these developments were included in CHA's initial RAD portfolio application and previous annual plan amendments. However, CHA has now included several properties in order to begin the second phase of the RAD conversion process. CHA is now moving forward to convert approximately 50 percent of its portfolio application during FY2016 with the rest to follow in FY2017 (with multi-phase developments extending into 2018) in accordance with HUD's RAD requirements.

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.

	PIC AMP	RAD Type	Total Units	Unit Mix Pre-Conversion / Post-Conversion	Pre-RAD Type	Transfer of Assistance Proposed	Capital Fund Allocation
<b>Fannie Emanuel (Parkview)</b>	IL002065000	PBV	181	1BR - 181	Mixed Finance-Senior	No	\$ 24,000,000
<b>The Kenmore</b>	IL002151000	PBV	100	1BR - 100	Mixed Finance-Senior	No	\$ 300,000
<b>The Pomeroy</b>	IL002152000	PBV	105	1BR - 104 2BR - 1	Mixed Finance-Senior	No	\$ 500,000
<b>Britton Budd Apts</b>	IL002144000	PBV	173	0BR - 45 1BR - 128	Mixed Finance-Senior	No	TBD
<b>Daniel Burnham Apts</b>	IL002075000	PBV	181	1BR - 181	Traditional Senior	No	TBD
<b>Schneider Apts</b>	IL002059000	PBV	174	1BR - 174	Traditional Senior	No	TBD
<b>Las Americas Apts</b>	IL002063000	PBV	212	1BR - 211 2BR - 1	Traditional Senior	No	TBD
<b>Lorraine Hansberry Apts</b>	IL002064000	PBV	169	1 BR - 169	Traditional Senior	No	TBD
<b>Mary Hartwell Catherwood</b>	IL002055000	PBV	357	0BR - 11 1BR - 343 2BR - 3	Traditional Senior	No	TBD
<b>Margaret Day Blake (incl. Maria Diaz Martinez and Elizabeth Woods)</b>	IL002072000	PBV	317	1BR - 313 2BR - 4	Traditional Senior	No	TBD

<b>Zelda Ormes</b>	IL002049000	PBV	269	0BR - 82 1BR - 186 2BR - 1	Traditional Senior	No	TBD
<b>Kenneth Campbell</b>	IL002082000	PBV	165	0BR - 24 1BR - 140 2BR - 1	Traditional Senior	No	TBD
<b>Mahalia Jackson</b>	IL002041000	PBV	282	0BR - 24 1BR - 140 2BR - 1	Traditional Senior	No	TBD
<b>Hilliard 1 Senior</b>	IL002135000	PBV	94	1BR - 94 (public housing)	Mixed-Income	No	TBD
<b>Hilliard 1 Family</b>	IL002099000	PBV	59	1BR - 12 2BR - 27 3BR - 10 4BR - 10	Mixed-Income	No	TBD
<b>Hilliard 2 Senior</b>	IL002100000	PBV	94	1BR - 94	Mixed-Income	No	TBD
<b>Hilliard 2 Family</b>	IL002134000	PBV	58	1BR - 12 2BR - 27 3BR - 9 4BR - 10	Mixed-Income	No	TBD
<b>Caroline Hedger</b>	IL002076000	PBV	450	0BR - 303 1BR - 145 2BR - 2	Traditional Senior	No	TBD
<b>Minnie Riperton</b>	IL002078000	PBV	339	1BR - 338 2BR - 1	Traditional Senior	No	TBD
<b>Robert Lawrence</b>	IL002086000	PBV	193	1BR - 192 2BR - 1	Traditional Senior	No	TBD
<b>Ada S. Dennison McKinley</b>	IL002081000	PBV	125	1BR - 124 2 BR - 1	Traditional Senior	No	TBD
<b>Ella Flagg Young Apts (incl. Castleman)</b>	IL002060000	PBV	436	0BR - 40 1BR - 396	Traditional Senior	No	TBD
<b>William Jones Apts</b>	IL002070000	PBV	116	1BR - 115 2BR - 1	Traditional Senior	No	TBD

<b>Irene McCoy Gaines Apts</b>	IL002062000	PBV	151	OBR - 32 1BR - 118 2BR - 1	Traditional Senior	No	TBD
<b>Alfreda Barnett Duster</b>	IL002042000	PBV	129	OBR - 26 1BR - 101 2BR - 1	Traditional Senior	No	TBD
<b>Elizabeth Davis Apts</b>	IL002050000	PBV	149	1BR - 148 2BR - 1	Traditional Senior	No	TBD
<b>Albany Terrace</b>	IL002061000	PBV	350	1BR - 350	Traditional Senior	No	TBD
<b>Edith Spurlock Sampson</b>	IL002074000	PBV	394	OBR - 46 1BR - 346 2BR - 2	Traditional Senior	No	TBD
<b>Flannery</b>	IL002044000	PBV	252	OBR - 54 1BR - 196 2BR - 2	Traditional Senior	No	TBD
<b>Wicker Park</b>	IL002068000	PBV	225	1BR - 223 2BR - 2	Traditional Senior	No	TBD
<b>Long Life</b>	IL002066000	PBV	116	1BR - 115 2BR - 1	Traditional Senior	No	TBD
<b>Mary Jane Richardson (incl. Maudelle Brown Bousfield)</b>	IL002079000	PBV	266	OBR - 87 1BR - 177 2BR - 2	Traditional Senior	No	TBD
<b>Vivian Gordon Harsh (incl. Judge Green)</b>	IL002083000	PBV	278	OBR - 21 1BR - 255 2BR - 2	Traditional Senior	No	TBD
<b>Judge Fisher</b>	IL002057000	PBV	199	OBR - 40 1BR - 159	Traditional Senior	No	TBD
<b>Lidia Pucinska</b>	IL002043000	PBV	378	1BR - 375 2BR - 2	Traditional Senior	No	TBD
<b>Patrick Sullivan</b>	IL002067000	PBV	482	OBR - 240 1BR - 240 2BR - 2	Traditional Senior	No	TBD

<b>Armour Square</b>	IL002046000	PBV	392	OBR - 43 1BR - 345 2BR - 4	Traditional Senior	No	TBD
<b>Lincoln Perry</b>	IL002052100	PBV	450	OBR - 8 1BR 440 2BR - 2	Traditional Senior	No	TBD
<b>Judge Slater</b>	IL002084000	PBV	407	OBR - 13 1BR - 393 2BR - 1	Traditional Senior	No	TBD
<b>Vivian Carter</b>	IL002080000	PBV	224	OBR 21 1BR - 255 2BR - 2	Traditional Senior	No	TBD
<b>Hattie Callner</b>	IL002048000	PBV	147	OBR - 30 1BR - 116 2BR - 1	Traditional Senior	No	TBD
<b>Horner Westhaven (Superblock)*</b>	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
<b>Lathrop Homes*</b>	IL002022000	PBV	400	1BR-454/1BR-TBD 2BR-401/2BR-TBD 3BR-63/3BR-TBD	Mixed-Income	Yes - locations TBD	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 4BR - 1	Mixed-Income	No	TBD
<b>Other</b>	--	PBV	748	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 PBV lease/lease addendum and RAD grievance procedure. These RAD policies were released for public comment in November 2014 and approved by CHA's Board in January 2015.

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

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

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

## Five Year Phase in:

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

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

5. **Public Housing Family Self Sufficiency (PH FSS).** Current Public Housing FSS participants will continue to be eligible for FSS once their housing is converted under RAD. CHA will be allowed to use any remaining PH FSS funds to serve those FSS participants who live in units converted by RAD. Due to the program merger between PH FSS and HCV FSS that took place pursuant to the FY14 Appropriations Act (and was continued in the FY15 Appropriations Act), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD. CHA will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984, the participants' contracts of participation, and the alternative requirements established in the "Waivers and Alternative Requirements for the FSS Program" Federal Register notice, published on December 29, 2014, at 79 FR 78100. Escrowed funds for PH FSS participants will be transferred into the HCV escrow account.
6. **Resident Participation and Funding.** Resident organizations and representation in place at CHA properties prior to the RAD conversion will continue to be managed and recognized in accordance with current CHA policies and HUD regulations.
7. **Resident Procedural Rights.** The following items will be incorporated into both CHA's HCV Administrative Plan and the owner's lease (including the required lease or lease addendum), as applicable.
  - a. **Termination Notification.** CHA's termination procedure for RAD will provide adequate written notice of termination of the lease. As required, CHA developed a termination policy that was included in updates to the HCV Administrative Plan that were released for public comment in November 2014 and approved by CHA's Board in January 2015.
  - b. **Grievance Process.** For issues related to tenancy and termination of assistance, CHA will provide an opportunity for an informal hearing. As required, CHA developed a grievance procedure that incorporates essential components of the current public housing grievance process as well as required RAD provisions.

CHA's RAD grievance procedure was released for public comment in November 2014 and approved by CHA's Board in January 2015.

- 8. Earned Income Disregard (EID).** Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent 5-year phase-in, as described in Section 1.6.C.4 (item #4 herein); instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

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 HUD authorization to retain the public housing policy for Earned Income Disregard (EID) in sites converting to Project-Based Vouchers under the RAD program. Upon HUD approval, CHA will update the EID policy for RAD PBV 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) waitlist and site-based senior housing waitlist (as applicable) for RAD properties. For RAD properties where transfer of assistance will be utilized, CHA will notify existing waitlist applicants on how they can apply for any new properties with site-based waitlists. All newly established site-based waitlists will be prepared in accordance with all applicable civil rights, fair housing laws and regulations, and applicable court orders.
- 11. Choice Mobility.** After completing a one-year residency requirement under the RAD program, households within RAD PBV units may request a tenant-based Housing Choice Voucher. CHA will provide tenant-based vouchers to the households that have requested them to the extent that they are available. Depending on the volume of households requesting a voucher, CHA reserves the right to provide no more than three-quarters of its turnover vouchers per year to eligible Choice-Mobility households.

*Certification of Consistency with Consolidated Plan***CERTIFICATION BY STATE OR LOCAL OFFICIAL OF THE PHA PLAN  
CONSISTENCY WITH THE CONSOLIDATED PLAN**

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

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



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Signed by the Appropriate State or Local Official

**Certification for a Drug-Free Workplace**

U.S. Department of Housing and Urban Development

**Certification for a Drug-Free Workplace**

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 Federalagency 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 <i>PATRICIA EMANUEL</i>	Title <i>DIRECTOR OF HUMAN RESOURCES</i>
Signature <i>Patricia Emanuel</i>	Date <i>SEPTEMBER 2 2015</i>

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

5. In instances where the employee's supervisor has a reasonable suspicion that, the employee is at work under the influence of drugs and/or alcohol.

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

The CHA drug and alcohol testing vendors are N.I.D.A. accredited. Drug and alcohol test results are confidential and are not disclosed to third parties by the CHA, except upon express written authorization of the employee or as required by law. Employees who submit to drug and alcohol testing described above and whose test results show a positive result will be terminated. Employees who refuse to cooperate in the testing process will be terminated. Employees whose test results are positive may elect to have the sample re-tested at a different N.I.D.A. accredited laboratory at the employee's cost. Arrangements for re-testing must be made through the Director of Human Resources.

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

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

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

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

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

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

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

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

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

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

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

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



**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

**Rahm Emanuel**  
Mayor, City of Chicago

**Eugene Jones, Jr.**  
CEO, Chicago Housing Authority

**John T. Hooker**  
Chairperson

**Matthew Brewer**  
**Craig Chico**  
**Mark Cozzi**  
**Dr. Mildred Harris**  
**Harriet Johnson**  
**John G. Markowski**  
**M. Bridget Reidy**  
**Francine Washington**  
Board of Commissioners



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