

Moving  Forward
Families Advancing to Self-Reliance



Moving Forward
Fiscal Year 2009-2010
ANNUAL REPORT

June 30, 2010

Housing Authority of the City of Charlotte, NC

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The mission of the Charlotte Housing Authority is to lead, develop, and execute community-wide strategies that meet the broad range of housing needs for families who cannot otherwise attain conventional housing.

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Housing Authority of the City of Charlotte Moving Forward Initiatives Summary

PAGE	APPROVED HUD INITIATIVES	DESCRIPTION	FISCAL YEAR IDENTIFIED	STATUS
16	Rent Reform and Work Requirement	Proposing modification of rent calculation and increase in minimal rent. A hardship policy will be in place. A Work Requirement Initiative will be implemented in FY 2010 - 2011.	2009-2010	In Development
24	Amend Section 8 Housing Assistance Payment (HAP) Agreement	CHA amended the HAP Agreement to make changes such as inclusion of an owner registration requirement and mandatory direct deposit. The revised HAP Agreement mandates that the owner must notify the family and CHA in writing of any foreclosure notices and that the tenant is not responsible for payment of the CHA portion of the HAP during the term of the HAP contract.	2008-2009	In Development
25	Participant and landlord tracking program	The University of North Carolina at Charlotte's (UNCC) utilized a Geographic Information Science (GIS) mapping system to identify voucher holders within Mecklenburg County in order to analyze the census tracts with a large number of Section 8 voucher holders to assist with deconcentration.	2007-2008	Implemented FY 2007 – 2008 Ongoing
26	Develop local design standards	CHA adopted local design standards that correlate with other funding sources available in Charlotte and the State of North Carolina.	2008-2009	Completed/ Tracking
27	Alternate Review Process	Beginning January 2010 re-certifications for senior/disabled will be bi-annual; criminal background checks will be conducted at recertification; and rent reform initiated.	2008-2009	In Development
28	Increase acquisition and rehabilitation of existing multi-family properties	CHA established a strategy and adopted a policy to increase the acquisition and rehabilitation of existing multifamily properties.	2008-2009	Implemented FY 2008 – 2009 Ongoing
29	Revise subsidy structure for developments in which CHA is direct developer	CHA designed a new rent structure for new and rehabilitated Public Housing developments when CHA is the direct developer.	2008-2009	In Development
30	Use single fund flexibility to develop additional units	CHA will use block grant funding to leverage financing for the development of 100 new or rehabilitated affordable housing units each year of the MTW program.	2008-2009	Implemented FY 2008 – 2009 Ongoing
31	Land Acquisition for Future Use	CHA will design local standards to guide land purchases in desirable, rapidly growing areas to provide more housing choices.	2008-2009	Implemented FY 2008 – 2009 Ongoing

PAGE	APPROVED HUD INITIATIVES	DESCRIPTION	FISCAL YEAR IDENTIFIED	STATUS
32	Partner with CMS for mixed income affordable units	Established a partnership with Charlotte Mecklenburg Schools to produce mixed-income affordable housing units and identified two potential sites.	2008-2009	Implemented FY 2008 – 2009 Ongoing
33	Site-based waiting lists Public Housing and Project Based Section 8	All public housing and Project-based Section 8 property waiting lists are managed at the site level.	2008-2009	Implemented FY 2008 – 2009 Ongoing
34	Occupancy Training	CHA and Central Piedmont Community College conduct “Good Neighbors” type training for all new Section 8 participants to assist families in their acclimation into a neighborhood. CHA plans to revise the mandated occupancy training curriculum for FY 2010 and include public housing residents.	2007-2008	Implemented FY 2007 - 2008 Ongoing
36	Develop CHA Standardized Form	The Charlotte Housing Authority has developed a CHA Housing Choice Voucher Form similar to HUD Form 52646 (Housing Choice Voucher) to allow for more than one extension approval and to incorporate additional family obligations.	2009-2010	Implemented FY 2009 – 2010 Ongoing
37	Single fund budget with full flexibility	CHA combined its public housing operating subsidies, public housing capital funds and its Housing Choice Voucher Program assistance into a single, authority-wide funding source.	2008-2009	Implemented FY 2008 – 2009 Ongoing
38	Adopt investment policies consistent with state law	CHA adopted investment policies that are consistent with state law to achieve a portfolio which is safer, more liquid and obtains competitive yield.	2008-2009	Implemented FY 2008 – 2009 Ongoing
40	Modify Section 8 inspection procedures	CHA received approval from HUD to waive the requirement for an initial Housing Quality Standards (HQS) inspection on newly constructed Section 8 units and utilize local building standards inspection and subsequent issuance of a Certificate of Occupancy (CO) as a substitution of the initial or move-in inspection.	2008-2009	Implemented FY 2008 – 2009 Ongoing
40	Section 8 Property Rating System	A quantitative evaluation rating system for the exterior appearance of a Section 8 property was developed to improve the housing quality standards of participating property owners.	2007-2008	Implemented FY 2007 – 2008 Ongoing
42	Community Based Rental Assistance (Streamline Project-Based Section 8 Process)	Simplified the selection process in order to maximize the number of quality Section 8 assisted units throughout Charlotte.	2008-2009	Implemented FY 2008 – 2009 Ongoing

PAGE	APPROVED HUD INITIATIVES	DESCRIPTION	FISCAL YEAR IDENTIFIED	STATUS
44	Housing for persons with disabilities, special needs and homeless	CHA created and enhanced relationships with local social service provider agencies by working with two major nonprofit providers on new supportive housing projects.	2008-2009	Implemented FY 2008 – 2009 Ongoing
45	Resident Safety Initiative	The Resident Safety Department expanded the types of crime prevention initiatives and program enforcement initiatives for both CHA public housing sites and Section 8 properties.	2009-2010	Implemented FY 2009 – 2010 Ongoing
47	Currents of Change	The Currents of Change Program is designed to stabilize and improve families by fortifying them through education, life skills, motivation and employment training to compete in the economic marketplace.	2008-2009	Implemented FY 2008 – 2009 Ongoing
48	Youth Services	CHA is focused on providing services for youth that connect them to programs and services that address truancy, post-secondary education preparation, and academic performance improvement.	2008-2009	Implemented FY 2008 – 2009 Ongoing
COMPLETED INITIATIVES				
	Affordable Housing Impact Studies	CHA commissioned UNCC to research the pattern and density of affordable housing and evaluate the association between the housing stock and crime rate, housing and property values, and school equity in surrounding residential communities.	2007-2008	Completed
	Assess Section 8 program participants	CHA surveyed all Section 8 program participants to measure their capacity for independent living. CHA will connect them with the services necessary to facilitate their progress toward that goal.	2008-2009	Completed

Introduction

Overview of the Agency's Ongoing MTW Goals and Objectives

The Charlotte Housing Authority (CHA) is participating in a federal demonstration program titled Moving To Work (MTW). The program allows participating agencies to design and test innovative approaches to local housing and policy issues. Moving to Work also allows the agencies to combine funding awarded by the US Department of Housing and Urban Development (HUD) into one single fiduciary budget with the flexibility to fund services and initiatives that may have been in jeopardy of delay or deletion due to funding gaps in received subsidy. For HUD, Moving To Work's success will be shown through the addition of more units, increase in the number of families served, and collaborative partnerships. The program has three statutory objectives: 1) reduce cost and achieve greater cost effectiveness in Federal expenditures; 2) give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and 3) increase housing choices for low-income families.

The Charlotte Housing Authority entered into a 10 year MTW agreement with HUD that began in April 2008. Participation in the MTW demonstration program aligns with the agency vision ***Creating Community, Empowering Families and Building Partnerships***. The exemptions provided through the Agreement allow CHA the flexibility needed to further assist in providing homes to those who are considered the hardest to house and to expand its housing role community-wide. Locally, Moving To Work is titled *Moving Forward*, reflecting a combination of shared intent, forward movement, and the image of affordable housing as a safety net and platform for rebuilding lives. The fiscal year 2009 - 2010 Moving Forward Annual Report is the Agency's report of outcomes of the HUD approved MTW initiatives in the fiscal year 2009 – 2010 Moving Forward Annual Plan.

The Charlotte Housing Authority's Corporate Scorecard Strategic goals also serve for the local Moving Forward Program:

- Provide the greatest number of viable and affordable housing solutions from homelessness to permanent housing through sustainable strategic partnerships.
- Maximize economic, physical, and social value of CHA real estate portfolio.
- Ensure the Authority's long-term financial viability.
- Provide high quality, cost effective real estate services that integrate client families into the community's mainstream.
- Create an environment that encourages client families to reach their highest potential.

The agencies Corporate Scorecard objectives which also serve as ongoing goals for the *Moving Forward* Program include:

- | | |
|---|---|
| ▪ Increase affordable housing opportunities | ▪ Enhance strategic technology infrastructure |
| ▪ Lead strategic partnerships | ▪ Optimize Performance of the Section 8 Program |
| ▪ Provide optimal housing choices | ▪ Maximize Customer Service |
| ▪ Maximize portfolio value | ▪ Ensure long-term financial viability |
| ▪ Maximize funding sources | |
| ▪ Promote innovative solutions | |

Major Activities for FY11

In fiscal year 2011, our status as an MTW agency will allow us to undertake three key initiatives: Rent Reform, a Local Rental Subsidy Program, and developing housing for families at or below 80% of the area median income who are neither Section 8 nor Section 9 customers. In addition, the agency will begin to use the recently awarded \$20.9 million FY09 HOPE VI grant to transform Boulevard Homes, a distressed public housing development, into a mixed-income community.

Moving Forward with MTW in the Charlotte Community

In order to raise community awareness and promote MTW in the Charlotte community, an educational outreach campaign was initiated in FY09. The Education Campaign included branding the name *Moving Forward* and development of the tag line *Families Advancing To Self-Reliance*. The educational outreach campaign focus is to make MTW the community's initiative, not just CHA's. The marketing tools use housing as a platform to success in other areas such as leaving a shelter, keeping children safe, achieving dreams, finding a good job, rebuilding lives, and other social enhancements that would not occur without housing.

The agency contracted with a marketing firm to conduct a benchmark study in March 2010 to assess the community's knowledge and perception of the Charlotte Housing Authority. There was very strong support for the principles of *Moving Forward* and nearly 75% of the individuals agreed that "it's impossible to function in society without safe and affordable housing". The Charlotte Housing Authority's CEO has taken *Moving Forward* community wide with stakeholders and customers. The CEO has participated in outreach engagements organized to talk about affordable housing issues in Charlotte and the role *Moving Forward* will play.

Collaborative partnerships are a key component in Charlotte's *Moving Forward* success. CHA is participating in With Every Heartbeat Is Life, a partnership between HUD and The National Heart, Lung, and Blood Institute. This initiative was created to help African Americans prevent heart disease. The initiative began in January 2010 and was successful in achieving the following outcomes:

- Conducted surveys for Cardiovascular Disease Risk factors in two communities.
- Initiated a Memorandum of Understanding (MOU) with CW Williams Community Health Center (Health Resources and Services Administration approved organization).
- Held a Health Screening to Kickoff the WEHL program on Jan 13th and April 21st 2010.
- Started first session of classes on January 20, 2010 and graduated 12 residents from 5 different CHA communities on March 31st.
- Started second session of classes on April 28th, 2010 and currently has 30 residents enrolled in the classes from 13 different CHA communities. Graduation will be held on July, 7th.

Outcomes will be reported at the end of FY 2010-2011.

A Collaborative Partnership of supportive service agencies was formulated under the leadership of the Charlotte Housing Authority to formulate collaborative solutions that address the affordable housing needs from unit development to supportive services. The Collaborative Partnership helps CHA ensure that *Moving Forward* is a community-wide initiative. Additionally, the agency has formed an Advisory Council, comprised of politicians and business leaders to help promote local legislative changes and gain political support for the new business plan.

II. General Housing Authority Operating Information

Housing Stock Information

		APRIL 1, 2009	MARCH 31, 2010
Number of public housing units at the end of the Plan year, discuss any changes over 10%		3,042 (did not include Hall House)	3,342(includes Hall House)
Description of any significant capital expenditures by development (>30% of the Agency's total budgeted capital expenditures for the fiscal year)			30% of the established capital budget listed in the plan would be \$2,077,624. CHA did not exceed this amount by development.
Description of any new public housing units added during the year by development (specifying bedroom size, type, accessible features, if applicable)		<u>Planned</u> 22 Ashley Park 63 McCreesh 85	<u>Actual</u> 17 Seneca Woods 22 Ashley Park 16 Fairmarket Square 18 Springcroft 26 McAlpine 10 Glen Cove 109
<i>Development</i>	<i>Accessible Features</i>	<i>Type</i>	<i>Bedroom Size</i>
Seneca Woods	<ul style="list-style-type: none"> • 2 H/C units that are mobility accessible • Lower kitchen and vanity counter tops 	Family	8 (2BR) 9(3BR)
Ashley Park	<ul style="list-style-type: none"> • Handicapped units (18) are equipped with lower counter heights, under counter work spaces and handicap compliant appliances • Four (4) of the handicap units are accessible for visually and hearing impaired persons • Common corridors and exit stairs are equipped with emergency strobe lighting • On-site management office/club house is ADA compliant including a handicap lift • Fitness room, media room and internet café are handicap accessible 	Senior	22 (1BR)
Fairmarket Square	<ul style="list-style-type: none"> • Four (4) accessible units • Wider doorways • Kitchen cabinet cut-out for wheel chair access • Lower light switches • Wider bathrooms • Grab bars in bath • Ramp leading to the office/club house 	Family	8 (2BR) 8 (3BR)
Springcroft	<ul style="list-style-type: none"> • Rails in bathroom/showers • Roll in showers 	Senior	18 (1BR)

	<ul style="list-style-type: none"> • Seats installed in the tubs • Shower heads are accessible • Kitchen fully accessible: switches are at a lower level for an individual using a wheelchair • Stove knobs are placed on front just above oven door • The sink is accessible for wheelchair • Emergency pull cords are in all units (in bathroom and bedroom) • "Talking" smoke detectors 		
McAlpine	<ul style="list-style-type: none"> • 26 handicap (hearing and mobility) accessible units • Lowered kitchen and vanity countertop • Walk-in/roll-in showers • Emergency strobe lighting • Common areas are handicap accessible 	Senior	26 (1BR)
Glen Cove	<ul style="list-style-type: none"> • 3 H/C units that are mobility accessible • Lower kitchen and vanity counter tops 	Family	5 (2BR) 5 (3BR)
Number of public housing units removed from the inventory during the year by development specifying the justification for the removal			46 units were removed from Boulevard Homes due to approved demolition and relocation plan July 2009
Number of MTW HCV authorized at the end of the Plan year, discuss any changes over 10%		4,260	4,579 (Includes 3 Disaster Housing Assistance Program and 234 Project Based)
Number of non-MTW HCV authorized at the end of the Plan year, discuss any changes over 10%		0	308 (Includes 100 Family Unification Program, 35 Veterans Affairs Supportive Housing, and 173 Blvd Homes Relocation)
Number of HCV units project-based during the Plan year, including description of each separate project		242	84- Prosperity Creek 30- McAden Park 18 -SpringCroft 18- Seigle Point 10- YWCA 14 -Ashley Square 60- 940 Brevard 234
Development	Description		
Prosperity Creek	Senior apt complex with on site management that features 1 and 2 bedroom apartments. A few selected units are handicap accessible. Apartment community features many modern, upscale amenities.		
McAden Park	Mixed-income family development comprised of two story garden apartments. The apartments provide 60 affordable rental units that offer one, two, and three bedroom floor plans for families. The units are an off-site component and the first phase in the Piedmont Courts Revitalization Plan.		
SpringCroft	SpringCroft at Ashley Park is a 50-unit Apartment Community specifically designed for senior citizens		

	who must be 55 years of age or older.					
YWCA	YWCA's Families Together program provides safe, affordable housing and intensive support services for homeless families with minor children.					
Ashley Square	Mixed-income family development located in offering state of the art features and amenities.					
940 Brevard	Complex is a 100 one-bedroom affordable units for the elderly in a mid-rise elevator building.					
Overview of other housing managed by the Agency, eg., tax credit, state-funded, market rate				There are 4 properties owned and managed by CHA's subsidiary Horizon Development. These properties are detailed below. They do not have any ACC units.		
<i>Development</i>	<i>Total Units</i>	<i>1BR</i>	<i>2BR</i>	<i>3BR</i>	<i>4BR</i>	<i>Type</i>
Grove Place	36	0	24	12	0	Market Rate
Oak Valley	50	0	32	18	0	Market Rate
Valley View	50	0	30	20	0	Market Rate
Villa Courts	36	0	36	0	0	100% Section 8 MF

Leasing Information – Actual

Total number of MTW PH units leased in Plan year	3,135
Total number of non-MTW PH units leased in Plan year	CHA does not have any non-MTW PH units
Total number of MTW HCV units leased in Plan year	4,105
Total number of non-MTW HCV units leased in Plan year	35
Description of any issues related to leasing of PH or HCV's	Stonehaven Apt has had trouble leasing. There are 24 public housing units in the 240 unit complex. They attribute it to less access to public transit. Stonehaven is located in one of the de-concentrated areas. The HCV program is not having any issues related to leasing.
Number of project-based vouchers committed or in use at the end of the Plan year, describe project where any new vouchers are placed (include only vouchers where Agency has issued a letter of commitment in the Plan year	<p>11 Cherry Gardens - New Construction 42 Total Units Senior Housing (Construction Complete and currently leasing up)</p> <p>52 Woodlawn – Rehab project with 104 total units (Anticipated date for execution of HAP June 2011)</p> <p>51 Moore Place- New construction with 85 total units being developed. (Anticipated date for execution of HAP Aug 2011)</p> <p>60 Steele Creek – New construction project with 120 units being developed. (Anticipated date for execution of HAP Sept 2011)</p> <p>10 Everett House – New construction project with all 10 newly developed units being CBRA Units. (Anticipated date for execution of HAP May 2011)</p> <p>*As of May 18, 2010 CHA has issued letters of commitment for these projects and while construction will not be complete until 2011 (with the exception of Cherry Gardens) all have been submitted to HUD Greensboro and are undergoing subsidy layering review.</p>

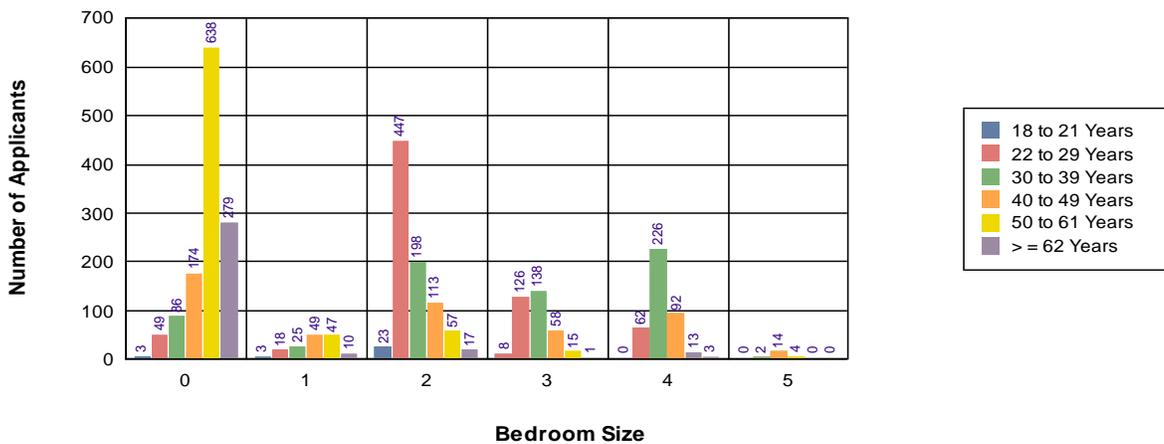
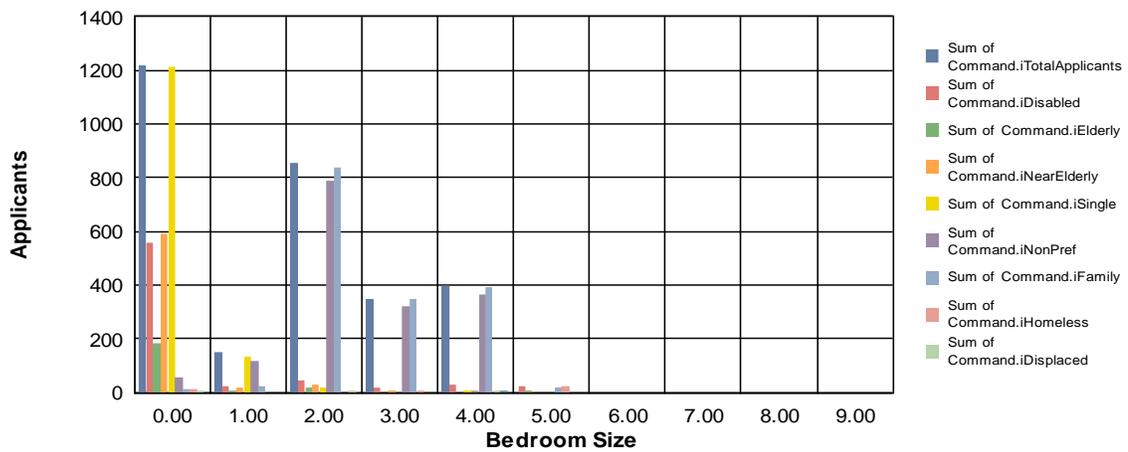
Waiting List Information

Number and characteristics of households on the waiting list (all housing types) at the end of the plan year.

The Charlotte Housing Authority had 3,001 applicants on the public housing wait list (site based) as of March 31, 2010. The wait list was comprised of 1,375 single applicants and 1,626 family applicants. The chart below details the breakdown by type and requested bedroom size of these 3,001 applicants.

BEDROOM SIZE	NUMBER OF APPLICANTS	DISABLED	ELDERLY	NEAR ELDERLY	SINGLE	NON PREFERENCE	FAMILY	HOMELESS	DISPLACED
0	1,231	557	186	596	1,223	55	8	8	7
1	153	19	5	16	132	115	21	1	3
2	855	41	13	29	16	787	839	1	3
3	346	16	0	6	0	319	346	7	1
4	396	26	1	4	4	363	392	2	2
5	20	2	0	0	0	18	20	0	0
Total	3,001	661	205	651	1,375	1,657	1,626	19	16

The corresponding graphs show the demand per bedroom size for type of applicant, as well as the number of applicants in age groups. As expected, the highest demand for 0 bedrooms is within the 50 to 61 age group, while the applicants between 22 to 29 years of age tend to require a 2 bedroom and those 30 to 39 more often need a 4 bedroom.



For the Section 8 wait list, CHA has 2,344 applicants, of which 2,126 were applying with family status and 218 were single applicants. The primary age requesting a housing choice voucher (HCV) falls between 30 – 39, with the 22 – 29 year olds not falling very far behind.

NUMBER OF APPLICANTS	DISABLED	ELDERLY	NEAR ELDERLY	SINGLE	NON PREFERENCE	FAMILY	HOMELESS	DISPLACED
2,344	29	4	2	218	2,309	2,126	1	0



Description of waiting lists (site-based, community-wide, HCV, merged) and any changes that were made in the past fiscal year

The Charlotte Housing Authorities public housing waitlist has been site-based since May 2008. The waitlist for families is closed, however, the senior hi rises opened in May 2009 for studio units and are still opened. It has not been determined when the waitlist will be reopened for families. The purging of waitlist occurs at the sites annually.

The Housing Choice Voucher Program uses a single waiting list for admission. The waitlist has been closed during the fiscal year. The waitlist was last purged February 2009 and will be purged again Fall 2010.

III. Non- MTW Related Housing Authority Information (Optional)

- A. List planned vs actual sources and uses of other HUD or other Federal Funds (excluding HOPE VI) - **CHA opts out of listing planned vs actual**
- B. Description of non-MTW activities implemented by the Agency

Changing CHA's Structure & Footprint

CHA took steps towards becoming a redevelopment commission and expanding its Section 9 jurisdiction countywide. Restructuring or reconstituting the Authority has several benefits:

1. Expanding the jurisdiction of the Authority could increase Section 9 (housing units that receive a operating subsidy authorized by Section 9 of the federal housing act) capacity by as much as 50%. Presently CHA has a limited number of Section 9 capacity left, as well as a limited footprint to operate additional Section 9 units. If left as it currently stands, this will result in a small impact on meeting the affordable housing needs.
2. Expanding the agency's ability to engage in non-residential real estate activity for the purpose of benefiting CHA's mission.
3. Increasing the financial resources available to the agency.

Capital Fund Recovery Competition

In September 2009, the Charlotte Housing Authority (CHA) was awarded \$6.2 million in funding for the Category 4 (Green Communities) of the Capital Fund Recovery Competition (CFRC) for the Charlottetown Terrace redevelopment. The redevelopment will provide a sustainable and "service-rich" environment for the residents. Charlottetown will be a LEED certified community. Sustainable and green measures will include low-flow toilets, energy star appliances, energy efficient lighting fixtures and other interior/exterior LEED improvements. Medical offices and other various offices for non-profit and government social service providers will be provided on site. Some amenities in the redevelopment include: multi -purpose room, commercial kitchen, computer center, theater room, hair salon, fitness center, activities room, lounge, and library.

Neighborhood Stabilization Program

The Charlotte Housing Authority received a \$2.1M Neighborhood Stabilization Program (NSP) Grant from the State of North Carolina to acquire Woodlawn House, an abandoned 104-unit multi-family apartment building. The blighted property will be rehabilitated with funds from the City of Charlotte's Neighborhood Stabilization allocation and operated as housing for low income seniors. CHA also received NSP funds from the City of Charlotte for renovations at Hampton Crest Apartments.

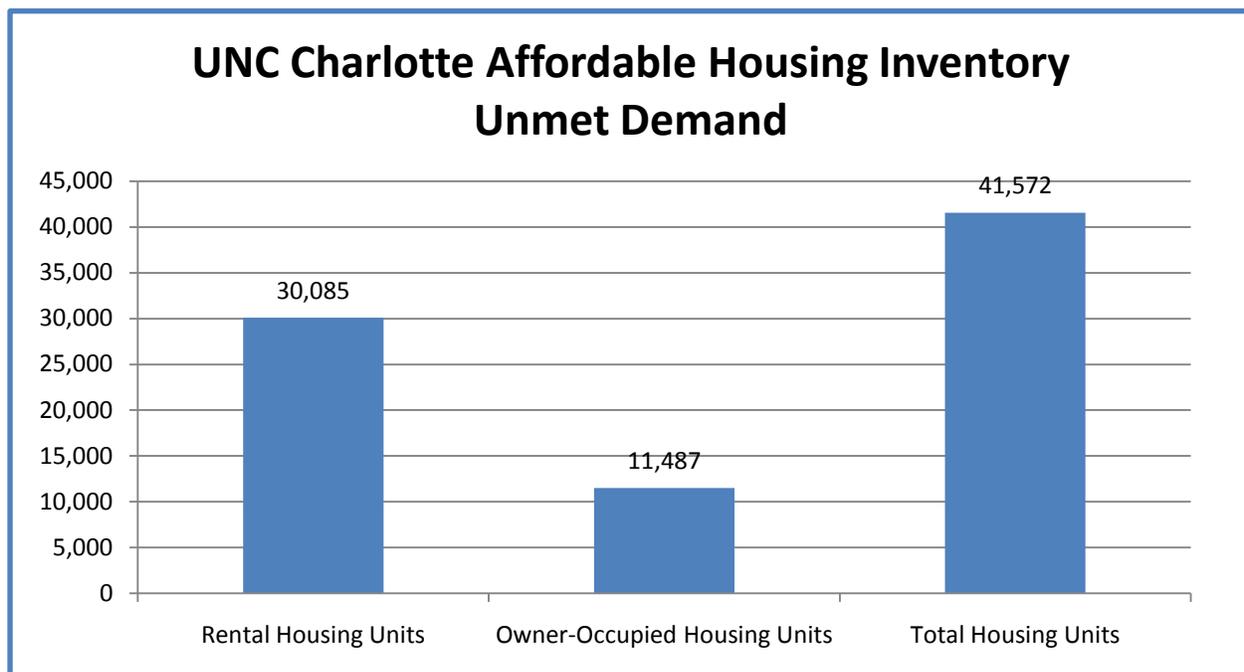
Affordable Housing Inventory Analysis

The Charlotte Housing Authority and its Affordable Housing Study Partners, (The Housing Partnership, the City of Charlotte Neighborhood Development Department, Mecklenburg County Department of Social Services, Crisis Assistance Ministry, A Way Home, Legal Aide of North Carolina, and the Urban Ministry Center) hereinafter referred to as the "Housing Study Commission", partnered to conduct a study to collect and analyze data for a comprehensive affordable housing market study.

The study focused on very-low income households and individuals that earn no more than 30% of the area median income. As a secondary and complementary analysis, the study also examined households

that earn between 30% and 60% of area median income. Affordable housing for these income groups means that housing costs (exclusive of utilities) do not exceed 30% of the family's or individual's gross income.

The primary purpose of the study, conducted by the University of North Carolina at Charlotte, was to create an in-depth and comprehensive database that quantifies and qualifies the unmet affordable housing demand. This includes quantifying the unmet demand for affordable housing, determining the various ways in which families and individuals in these income groups are currently housed, and inventorying the current housing and accompanying supportive services. The study used the data to formulate projections, identify trends, evaluate existing barriers to housing for these families and individuals and recommended possible strategies to meet the unmet affordable housing need inclusive of supportive services. The rental housing unit count also includes 4,477 homeless people. A summary of the data gathered from this study is presented below.



Recommendations for increasing the affordable housing supply included:

- Increasing tenant income and improving creditworthiness
- Improving tenant behavior and manager/landlord acceptance
- Implement creative Adaptive Reuse Strategies
- Identify and encourage the development of infill housing through redevelopment projects
- Address nuisance rental properties

The study will be used as factual information to form the basis for policy and strategic business decisions for the members of the Housing Study Commission and the larger community.

IV. Long-term MTW Plan (Optional)

The Charlotte Housing Authority long term vision for use of MTW flexibility is focused on serving more families by creating additional units & partnering with supportive service and supportive housing providers, and creating comprehensive solutions to transition low income families to self-sufficiency. The critical focus areas are Self-Sufficiency, Educating Children and Enhancing the Portfolio.

Self-Sufficiency

Self-Sufficiency strategies include the pursuing of Resident Opportunity for Self-Sufficiency (ROSS) grants, a phased in Case Management Model, a Service Coordinator for the Elderly and Disabled and continuing the \$100,859 Jobs Access and Reverse Commute grant in partnership with the Charlotte Area Transportation System (CATS), which enables CHA to provide free bus passes' to residents/participants for job interviews, job training, or work. The Charlotte Housing Authority is tracking its success in self-sufficiency initiatives by:

1. The employment rate for able-bodied heads of households and other family members
2. The number of family members in training and/or education programs
3. The increase in average and median income of families (all sources and earned income) (excluding seniors & disabled families)
4. Amount of funds leveraged for supportive services

Educating Children

CHA would like to decrease the generational poverty that is ingrained in our communities. Therefore, CHA pursues a more proactive engagement with the school district and agencies that provide academic and social enrichment activities for children from birth until high school graduation. Additional measures will be added as activities are added, however, current measures include:

1. The number of children who enter post secondary education
2. Percent increase in number of CHA students who enter the Charlotte Housing Authority Scholarship Fund program

Enhancing the Portfolio

CHA intends to leverage MTW block grant funds with other city, state and federal resources to serve families 80% and below the area median income to impact the following measures over the next eight years:

1. The number of housing units in mixed-income environments
2. The distribution of housing units and housing opportunities (a) Section 9 and (b) Project-based Section 8

V. Proposed MTW Activities: HUD approval requested

This section describes the activities approved by HUD in the fiscal year 2010 Moving Forward Annual Plan, but not yet implemented.

A. Describe any activities that were proposed in the Plan, approved by HUD, but not implemented, and discuss why these activities were not implemented.

In the fiscal year 2009 – 2010 Moving Forward Annual Plan, CHA proposed and received HUD approval for a Rent Reform and Work Requirement, creation of a CHA Standardized Form allowing for more than one extension in the Housing Choice Voucher Program, and Resident Safety Initiatives. The CHA Standardized Form and Resident Safety initiatives were implemented and will be reported in the Ongoing MTW activities section.

The Rent Reform and Work Requirement for Public Housing and Section 8 Program were not implemented. The activity was delayed because the Charlotte Housing Authority received resident feedback concerning the actual changes to the rent calculations and the incentive timeline were complicated. A revised rent reform was submitted in the FY11 Moving Forward Annual Plan and subsequently approved by HUD. The scheduled implementation date is fall 2010. The proposed rent bands and the flat incentive calculation were simplified.

The following is the activity description sent to HUD that was approved in the FY11 Moving Forward Annual Plan:

CHA has made modifications to the Rent Reform proposal in order to simplify the calculation of families total tenant payment to provide a financial incentive for participants to increase their earnings. Elderly and disabled household participation will be voluntary. The Rent Simplification applies to both public housing and Section 8. CHA denotes items previously approved in the original HUD approved activity in the FY10 Moving Forward Annual Plan. Items approved in Charlotte's Housing Occupancy Plan (HOP) by the Board of Commissioners in July 2009 are also noted.

Interim Recertifications (currently approved in HOP)

Participants will still be afforded interim rent recertification between annual recertifications provided they meet the established criteria. If there is a decrease in the family's income or an increase in medical expense or childcare expense which is expected to last longer than sixty (60) days and will change their flat deduction eligibility, the participant may request that an interim recertification be performed. Participants must still report changes in family size. Participants still need permission to add a household member.

Annualized Income (currently approved in HOP)

Income earned by seasonal employment will be annualized on a 12 month basis if the employee has maintained employment for more than 60 days. The income of employees of temporary employment agencies will be annualized after an initial 30 days of assignments.

Zero Income Recertifications (currently approved in HOP)

All families claiming zero income will have 90 days to establish either earned or unearned income. After 90 days they will be required to report to the CHA the status of their income; they will

continue reporting to the Charlotte Housing Authority every 90 days until income has been established.

Income Exclusions

Income from assets of \$5,000 or less will be excluded allowing the accumulation of more assets before they are included in income. The annual recertification will include self-certification for assets below \$5,000, or third-party verification for assets over \$5,000. The use of a self-certification will reduce the amount of time staff spends completing recertifications.

Expense Adjustments

Traditional Medical and Childcare deductions are eliminated. Participants need only verify enough non-reimbursable expenses to meet the requested deduction level listed below.

Medical Expenses	Medical Deduction	Childcare Expense	Childcare Deduction
\$0 - \$2,499	\$0	\$0 - \$2,499	\$0
\$2,500 - \$4,999	\$2,500	\$2,500 - \$4,999	\$2,500
\$5,000 - \$7,499	\$5,000	\$5,000 - \$7,499	\$5,000
\$7,500+	\$7,500	\$7,500+	\$7,500

Households will continue to be given the HUD elderly/disabled household and dependent allowances as applicable.

Minimum Rents (currently approved in HOP and MTW annual plan)

Minimum rent increased to \$50 on April 1, 2009 and will increase to \$75 on September 1, 2010 and to \$100 on April 1, 2011. CHA has to complete upgrades to Yardi software system to begin using the new 50058.

Earned Income Disregard / Phase-In Rent

Traditional Earned Income Disregard will be eliminated. However, income increases of less than \$200 / month are not required to be reported (creating a revised disregard), unless the resident requests a recertification. The HUD Earned Income Disregard was a very time intensive process, difficult to track, and complicated to explain to residents.

Revised Rent Schedule

CHA will implement an income-based stepped flat rent with stepped escrow deposits. The income bands will be a \$2,500 range with the stepped rent being 30% of the range midpoint (ex: \$2,500 – 4,999 annual income band midpoint is \$3,750 /12 (monthly)* 30% = \$94 total tenant payment). Annual adjusted income will be used to establish total tenant payment. Escrow deposits will begin when the household adjusted income including wages reaches \$12,500 and ends when the household adjusted income reaches 50% of the area median income (AMI) or 3 years after reaching 40% AMI whichever comes first. A ceiling flat rent will be established at Fair Market Rents for each bedroom size.

Assistance Sanctions (currently approved in HOP and MTW annual plan)

Participants who fail to comply with the terms of the work requirement policy may be sanctioned. The sanctions will increase in magnitude the longer a resident is in non-compliance, and the sanctions shall be applied in phases as follows:

Phase I: Participants will have a three (3) month grace period to cure non-compliance; if not cured within three (3) months, Phase II sanctions will be applied.

Phase II: Participants will lose 50% of their rental assistance for up to six (6) months. If they fail to correct the non-compliance within six (6) months, Phase III sanctions will be applied.

Phase III: Participants will lose 100% of their rental assistance for six (6) months and will be required to pay the established market rent. Participants still have the option to cure the non-compliance during the 6-month period while they are paying market rent. If Participants fail to cure the non-compliance by the end of the 6-month period they will continue to pay market rent and move to Phase IV.

Phase IV: Participant's Assistance will be terminated and their incentive account, if any, is forfeited due to non-compliance.

Participants who have a second incident of non-compliance within twelve (12) months of the initial incident of non-compliance will move directly to Phase III of the sanctions.

Impact Analysis The Rent Simplification Impact Analysis was conducted by Edgemere Consulting. A summary of the methodology, assumptions, and results is attached as Appendix I.

Hardship Policy (currently approved in HOP)

Applying for Hardship Rent.

The Hardship Review Committee was created to review individual cases of significant rent burdens or increases for families with high cost of living, childcare or medical expenses. Participants can request a Hardship Waiver Request form from their manager. Participants must make their request for Hardship Review no later than thirty (30) calendar days after notification of increased rent or the occurrence of a hardship event.

Who Qualifies for a Hardship Rent?

In order for a family to qualify for a hardship exception, the family's circumstances must fall under one of the following hardship criteria:

- The family has lost eligibility or is awaiting an eligibility determination for federal, state or local assistance, including a family with a member who is a non-citizen lawfully admitted for permanent residence under the Immigration and Nationality Act, and who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996.
- The family would be evicted as a result of the imposition of the minimum rent requirement.
- The income of the family has decreased because of changed circumstances, including loss of employment, change in Household composition, or other circumstances as determined by the CHA or HUD.
- When the family has a significant increase in expenses because of changed circumstances for medical costs, childcare, transportation, or education.
- When a death has occurred in the family (spouse, child, brother, sister, aunt, uncle, niece, nephew or in-law) and the expenses for funeral, burial and related expenses has caused a financial hardship to the family.

- Where the Head of Household is Disabled as defined in the Hardship policy.
- Where the Head of Household is Elderly as defined in the Hardship policy.

How does the committee work?

The Hardship Review Committee meets regularly to review each resident's Hardship Waiver Request. The Hardship Review Committee will examine each family's circumstances on a case-by-case basis. The Hardship Review Committee has a choice of six remedies it can recommend as it deems appropriate, to reduce a qualifying Household's rent burden:

- Temporary suspension of minimum rent (90 days);
- Set interim rent at pre-rent reform rent for a specified period of time not to exceed one year;
- Long Term waiver of minimum rent;
- Extend \$100 monthly rent increase cap for up to one year (not to exceed two years total);
- Phase \$100 per month rent increase cap out over specified period of time beyond the 2 year remedy described above; or
- Appropriate combination of remedies listed above.

The Hardship Committee will send its recommendation to the department director to approve or disapprove. The department director will return the decision to the manager and applicant. Applicants who disagree with the Committee's decision can request a Grievance hearing. CHA will take no action to change a resident's rent in cases where a Grievance hearing has been requested.

Three-Year Incentives Period (approved in previous rent reform proposal / MTW annual plan) Once a participant's earnings reach 40% AMI, the resident has three years (or until their income reaches 50% AMI) in which to build assets based on increased earnings. During this incentive period, residents can build assets in their Incentive Accounts by maintaining or increasing their earnings and moving into the next income band.

Example -1 Bedroom Alternative Rent Schedule

Minimum Rent = \$75

Income Range		30% of mid	TTP	Incentive Account Deposit	CHA portion
\$0	\$2,499	\$31	\$75	\$0	\$75*
\$2,500	\$4,999	\$94	\$94	\$0	\$94
\$5,000	\$7,499	\$156	\$156	\$0	\$156
\$7,500	\$9,999	\$219	\$219	\$0	\$219
\$10,000	\$12,499	\$281	\$281	\$0	\$281
\$12,500	\$14,999	\$344	\$344	\$10	\$334
\$15,000	\$17,499	\$406	\$406	\$15	\$391
\$17,500	\$19,999	\$469	\$469	\$20	\$449
\$20,000	\$22,499	\$531	\$531	\$30	\$501
\$22,500	\$24,999	\$594	\$594	\$40	\$554
\$25,000	\$27,499	\$656	\$656	\$50	\$606**
\$27,500	\$29,999	\$719	\$682	\$50	\$632***
\$30,000	\$32,499	\$781	\$682	\$50	\$632
\$32,500	\$34,999	\$844	\$682	\$50	\$632
\$35,000	\$37,499	\$906	\$682	\$0	\$682****
\$37,500	\$39,999	\$969	\$682	\$0	\$682
\$40,000	\$42,499	\$1,031	\$682	\$0	\$682
\$42,500	\$44,999	\$1,094	\$682	\$0	\$682
\$45,000	\$47,499	\$1,156	\$682	\$0	\$682
\$47,500	\$49,999	\$1,219	\$682	\$0	\$682
<p>*Minimum Rent is greater than 30% of income **40% Average Median Income (AMI) ***Fair Market Rent is less than 30% of income ****50% AMI is reached, incentive account deposits end</p>					

Example -2 Bedroom Alternative Rent Schedule

Minimum Rent = \$75

Income Range		30% of mid	TTP	Incentive Account Deposit	CHA portion
\$0	\$2,499	\$31	75	0	75*
\$2,500	\$4,999	\$94	\$94	0	\$94
\$5,000	\$7,499	\$156	\$156	0	\$156
\$7,500	\$9,999	\$219	\$219	0	\$219
\$10,000	\$12,499	\$281	\$281	0	\$281
\$12,500	\$14,999	\$344	\$344	10	\$334
\$15,000	\$17,499	\$406	\$406	15	\$391
\$17,500	\$19,999	\$469	\$469	20	\$449
\$20,000	\$22,499	\$531	\$531	30	\$501
\$22,500	\$24,999	\$594	\$594	40	\$554
\$25,000	\$27,499	\$656	\$656	50	\$606**
\$27,500	\$29,999	\$719	\$719	50	\$669
\$30,000	\$32,499	\$781	\$757	50	\$707***
\$32,500	\$34,999	\$844	\$757	50	\$707
\$35,000	\$37,499	\$906	\$757	0	\$757****
\$37,500	\$39,999	\$969	\$757	0	\$757
\$40,000	\$42,499	\$1,031	\$757	0	\$757
\$42,500	\$44,999	\$1,094	\$757	0	\$757
\$45,000	\$47,499	\$1,156	\$757	0	\$757
\$47,500	\$49,999	\$1,219	\$757	0	\$757
*Minimum Rent is greater than 30% of income **40% Average Median Income (AMI) ***Fair Market Rent is less than 30% of income ****50% AMI is reached, incentive account deposits end					

Example -3 Bedroom Alternative Rent Schedule

Minimum Rent = \$75

Income Range		30% of mid	TTP	Incentive Account Deposit	CHA portion
\$0	\$2,499	\$31	\$75	\$0	\$75*
\$2,500	\$4,999	\$94	\$94	\$0	\$94
\$5,000	\$7,499	\$156	\$156	\$0	\$156
\$7,500	\$9,999	\$219	\$219	\$0	\$219
\$10,000	\$12,499	\$281	\$281	\$0	\$281
\$12,500	\$14,999	\$344	\$344	\$10	\$334
\$15,000	\$17,499	\$406	\$406	\$15	\$391
\$17,500	\$19,999	\$469	\$469	\$20	\$449
\$20,000	\$22,499	\$531	\$531	\$30	\$501
\$22,500	\$24,999	\$594	\$594	\$40	\$554
\$25,000	\$27,499	\$656	\$656	\$50	\$606**
\$27,500	\$29,999	\$719	\$719	\$50	\$669
\$30,000	\$32,499	\$781	\$781	\$50	\$731
\$32,500	\$34,999	\$844	\$844	\$50	\$794
\$35,000	\$37,499	\$906	\$906	\$0	\$906***
\$37,500	\$39,999	\$969	\$954	\$0	\$954****
\$40,000	\$42,499	\$1,031	\$954	\$0	\$954
\$42,500	\$44,999	\$1,094	\$954	\$0	\$954
\$45,000	\$47,499	\$1,156	\$954	\$0	\$954
\$47,500	\$49,999	\$1,219	\$954	\$0	\$954
<p>*Minimum Rent is greater than 30% of income **40% Average Median Income (AMI) ***Fair Market Rent is less than 30% of income ****50% AMI is reached, incentive account deposits end</p>					

Disbursing Incentive Accounts (approved in previous rent reform proposal / MTW annual plan) Participants can access their Incentive Accounts for any reason once they leave subsidized housing or the voucher program. While they continue to receive housing subsidy, however, account access will be limited to amounts needed to help participants overcome specific verifiable barriers to work. An example is for repairs to, or purchase of, a car needed to get to work. Disbursing Incentive Accounts will be done on a case-by-case basis and no more than 50% of the incentive account may be dispersed prior to assistance termination.

End of Program (approved in previous rent reform / MTW annual plan) Once the three-year Incentives Period is over, participants do not build any additional incentive account. However, they may continue to receive assistance until they are ready to move on. Participants will be encouraged to move when 40% of AMI is attained. If a participant terminates assistance/moves out within 2 years of completion they will be entitled to the full account balance; after 2 years (month 25 forward) the incentive will begin to diminish as shown in the following chart.

Timeframe for participant to exit program after completion	Percentage of Incentive Account participant is entitled to
After completion	100%
2-3 years (25-36 months)	80%
3-4 years (37-48 months)	60%
4-5 years (49-60 months)	40 %
5-6 years (61-72 months)	20%
More than 6 years (73 + months)	0%

How Activity Relates to Statutory Objective

The Rent Reform and Work Requirement Initiative promotes work by requiring it for program compliance. By modifying the formula for calculating families’ rent obligation CHA will provide a strong financial incentive for residents to increase their earnings. The new formula will allow all residents to build assets as their earnings grow. It also will ensure that rent levels remain affordable at all times, while nevertheless preparing residents to afford market rents as their incomes grow. An incentivized work requirement will provide an increase in household income. The availability of life skills and work support programs to be delivered by private case management will promote household stabilization and participants will be able to develop a defined goal towards self-reliance.

Anticipated Impact, Metric, Baselines & Benchmarks

Anticipated Impact	Metric	Baseline	Benchmark FY11
Increase in earned income	Amount of earned wages	\$12,589	\$12,903 (2.5%)
Increase number of members with earned income	# of working households	1,980	2,178 (10%)
Decrease number of households paying minimum rent	Number of minimum rent households	1,486	1,337 (10%)

CHA has decided to implement the Work Requirement in conjunction with the case management that will be phased in at the sites. This is to ensure that we have sufficient case management to address the volume of customers that needed assistance. We propose a phase in approach beginning with 3 – 4 communities including Boulevard Homes, a FY09 HOPE VI recipient. Six hundred (600) customers a year are slated for comprehensive family services.

VI. Ongoing MTW Activities: HUD approval previously granted

The following section reports on activities approved by HUD for fiscal years 2008, 2009 and 2010, however, if they were approved in FY2010 and not implemented, they are reported on in the Proposed MTW Activities section.

STUDY AND POLICY INITIATIVES

Amend the Section 8 Housing Assistance (HAP)

A. List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.

CHA received approval in the FY09 Annual Plan to Amend the Section 8 Housing Assistance (HAP) Agreement. The revised HAP contract requires landlords/owners participating in the Section 8 Program to register their property with CHA. The new HAP contract also requires landlords to participate in direct deposit.

B. Provide detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.

A PDF version of the HAP Contract was implemented in October 2009. Full Yardi database implementation has been completed and Section 8 staff began using the Yardi database version May 2010.

The annual benchmark was to have 100% of landlords participating in direct deposit. As a result of the mandatory direct deposit and landlord registration, 1,576 (93%) out of 1,693 landlords receiving Housing Assistance Payments are signed up for direct deposit. This increase is over the 78% baseline. The 117 landlords that are still receiving paper checks are landlords that had HAP contracts in place prior to the implementation of the revised CHA HAP contract.

There has been a +19% percent change in the number of landlords utilizing direct deposit since the start of the activity. Based on these outcomes, the metric to increase the percent of landlords participating in direct deposit has been effective in achieving administrative efficiencies and costs savings because the mandatory use of direct deposit has reduced the number of checks that have to be voided and reissued. The current cost for direct deposit is \$15,724 per month or \$12.60 per landlord (for 1,576 landlords) compared to \$12,953.60 per month or 36.80 per check (for 117 landlords) the cost of processing paper checks. The activity is on schedule.

C. If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.

The 100% landlord direct deposit benchmark was not achieved due to the fact that some landlords are still under old Housing Assistance Payment (HAP) Contracts that do not require direct deposit. Existing landlords will be required to sign a new HAP contract if there is a change in utilities and/or utility responsibility or if a new tenant transfers to the unit.

D. If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact (e.g. after 2 years of rent reform only 6 hardship cases).

The benchmarks have not been revised.

- E. **If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.**

In addition to the Section 8 Accountant completing a quarterly report of landlords enrolled in Section 8 direct deposit using the Yardi Software System, a survey has also been developed to gauge usability of the new HAP Contract. Staff will be evaluated within 6 months of Yardi database implementation.

- F. **If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.**

The authorization did not change.

- G. **Cite the specific provision(s) of the Act or regulation that is waived under MTW (as detailed in Attachment C or D of this Restated Agreement) that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.**

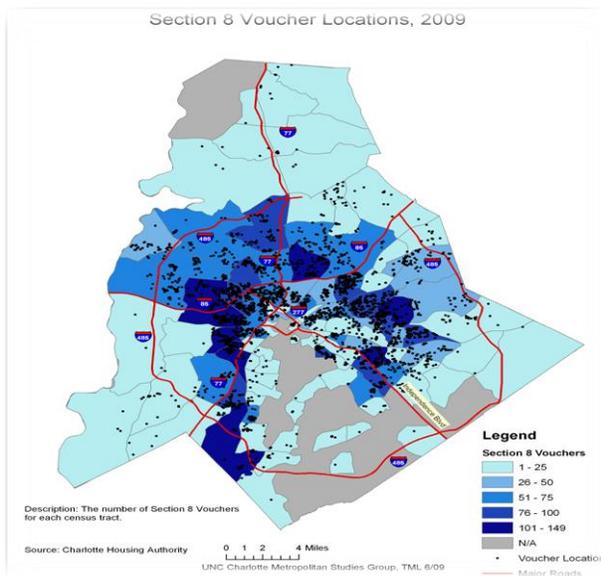
Attachment C: Section D.1. a., D.1.c. and D.5. The waiver is necessary so that the Agency can create a locally designed Housing Assistance Payment (HAP) contract to owners during the term of the MTW demonstration.

Participant and Landlord Tracking Program

- A. **List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.**

CHA received approval in the FY08 Annual Plan to implement a ***Participant and Landlord Tracking Program***. CHA would like to increase fair market rents (FMR) in identified areas of Charlotte/Mecklenburg County that have low Section 8 participation in order to address de-concentration of poverty and increase access to affordable housing opportunities in non-concentrated areas.

- B. **Provide detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.**



CHA partnered with the University of North Carolina at Charlotte (UNC Charlotte) to use Geographic Information Science (GIS) mapping to identify each voucher holder within the City of Charlotte/Mecklenburg County. The initial baseline results indicated that 78% of Section 8 voucher holders reside in 8 concentrated zip codes within the City of Charlotte (28208, 28215, 28216, 28205, 28217, 28212, 28269, and 28213).

In 2009, the Section 8 Department incorporated education in the voucher briefing on the benefits of residing in low minority/low poverty areas. As of May 2010, 74% of Section 8 voucher holders reside in the concentrated zip codes as a result of education and transfers. The CHA has proposed to conduct a housing market study in the 2010-2011 MTW Plan to

determine reasonable fair market rents in Charlotte/Mecklenburg County in order to adjust FMRs to pursue de-concentration efforts and establish justifiable FMRs.

The proposed benchmark for the Participant and Landlord Tracking initiative was to achieve a 6% reduction in the concentrated zip codes. There was a 5% change in the concentrated zip codes. The CHA missed the benchmark by 1%. It is anticipated that there will be a greater reduction in the concentrated zip codes after a market study is conducted to justify an increase in Fair Market Rents for the City of Charlotte/Mecklenburg County area. This activity is on schedule due to the length of time it took to collect adequate data. The market study is planned for FY 2010-2011.

C. If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.

CHA now provides education on the benefits of residing in low minority/low poverty areas, however; the current payment standards still inhibit participants from residing in certain areas of the City of Charlotte/Mecklenburg County. It is anticipated that once a market study is conducted and the FMRs are increase to match the City of Charlotte/Mecklenburg County's actual rental market prices, Section 8 voucher holders will become less concentrated.

D. If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact (e.g. after 2 years of rent reform only 6 hardship cases).

Neither the benchmarks nor metrics have been revised.

E. If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.

The data collection methodology has not changed. The data continues to be compiled on a quarterly basis.

F. If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.

In the FY11 Moving Forward Annual Plan, CHA noted that authorization from Attachment C: D.2.a, D.7.c.iii were added to the existing authorizations in order to receive a waiver to exceed 120% of HUD's FMR.

G. Cite the specific provision(s) of the Act or regulation that is waived under MTW (as detailed in Attachment C or D of this Restated Agreement) that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.

Attachment C: Section D. 2. a. The waiver is necessary to achieve the benchmark because it reduces the concentration of vouchers in certain census tracts in Charlotte and increases housing choices for low-income families.

Local Design Standards

A. List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.

The Charlotte Housing Authority was approved to create Local Design Standards in FY09. CHA adopted local design standards that correlate with other funding sources available in Charlotte and the state - primarily those of the North Carolina Housing Finance Agency. This eliminates the need to expend funding on multiple architectural reviews to ensure various requirements are met. In addition, the NCHFA (www.NCHFA.org)

standards are subject to a statewide public review and comment process each year to ensure that they meet changing building guidelines and local standards. As a state agency authorized to expend federal funds, the NCHFA guidelines meet all applicable federal requirements.

B. Provide detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.

CHA has designed and implemented the initiative; however, no new construction projects have received funding or started allowing the guidelines to be used.

C. If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.

The activity's effectiveness has not been determined because the activity has not been used.

D. If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact (e.g. after 2 years of rent reform only 6 hardship cases).

Neither the benchmarks nor the metrics have been revised.

E. If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.

The data collection methodology has not been changed.

F. If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.

The authorization did not change.

G. Cite the specific provision(s) of the Act or regulation that is waived under MTW (as detailed in Attachment C or D of this Restated Agreement) that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.

Attachment C: C.12 The waiver was necessary to forgo multiple architectural reviews to ensure that various requirements are met.

RENT REFORM INITIATIVES

Alternate Review Process

A. List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.

CHA was approved to conduct an Alternate Review Process in FY09. The process would allow CHA to conduct bi-annual reexaminations for elderly and disabled families. Initially, delay of implementation was due to approval timeline by the Board of Commissioners, however, at this time, the Charlotte Housing Authority is making the appropriate software upgrades to accommodate the new MTW 50058. This initiative should begin fall 2010.

B. Provide detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.

The Charlotte Housing Authority is unable to report on any benchmarks or outcomes because the activity has not been implemented.

- C. If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.**

The activity's effectiveness has not been determined because the activity has not been implemented.

- D. If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact (e.g. after 2 years of rent reform only 6 hardship cases).**

Neither the benchmarks nor metrics have been revised. CHA proposes a 50% decrease in the number of recertifications completed for the elderly and disabled.

- E. If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.**

The data collection methodology has not changed. CHA's software system will be utilized to determine the number of recertifications completed using alternate review process.

- F. If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.**

No new authorizations were added.

- G. Cite the specific provision(s) of the Act or regulation that is waived under MTW (as detailed in Attachment C or D of this Restated Agreement) that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.**

Attachment C: C.4. The waiver allows the agency to reduce the time spent on recertifications.

UNIT PRODUCTION INITIATIVES

Increasing The Acquisition/Rehabilitation of Existing Multi-Family Properties

- A. List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.**

CHA was approved to implement *Increasing The Acquisition/Rehabilitation of Existing Multi-Family Properties* in FY09. This activity allowed CHA to achieve cost effectiveness and increase housing choices by acquiring and rehabbing existing multi-family properties rather than construct new.

- B. Provide detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.**

In the FY09 Moving Forward Annual Plan, the Charlotte Housing Authority's baseline was set at zero (0), and the benchmark was to add 50 rehabilitated units per year as part of the overall agency goal to produce 100 units per year through new construction and rehabilitation at a cost less than \$120,000 per unit. CHA exceeded that goal in FY09 with the addition of 110 units with an average of \$59,863.

In FY10, CHA set a goal of 400 units. At the end of the fiscal year, 343 units had been acquired. Hampton Creste and Woodlawn House are now in the rehabilitation process. The authority acquired Mill Pond and McMullen Woods prior to the end of the fiscal year, however, they did not require rehabilitation. In

addition, the authority had Little Rock Apartments (242 units) under contract in FY10. However, the closing was delayed while waiting on approval of the Local Non- Traditional MTW Flexibility. The metric resulted in an additional 566 units at a cost lower than constructing new units. This activity is on schedule.

Development	Units	Cost per unit
Hampton Creste	239	\$23,013
Woodlawn House	104	\$80,384
McMullen Woods	55	\$61,000
Mill Pond	168	\$67,500

- C. If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.**

The benchmark was exceeded and the activity determined effective.

- D. If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact (e.g. after 2 years of rent reform only 6 hardship cases).**

Neither the benchmarks nor metrics have been revised.

- E. If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.**

The data collection methodology has not changed.

- F. If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.**

No new authorizations were added.

- G. Cite the specific provision(s) of the Act or regulation that is waived under MTW (as detailed in Attachment C or D of this Restated Agreement) that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.**

Attachment C: C 13. The waiver was necessary to remove the HUD approval layer in order to move in a timely, cost efficient manner in acquiring properties.

Revised Subsidy Structure for Developments in Which CHA is Direct Developer

- A. List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.**

CHA was approved to implement a ***Revised Subsidy Structure for Developments in Which CHA is Direct Developer Initiative*** in FY09. The objective was to design new and rehabilitated Public Housing for working families who pay 30% of their income for rent. For these developments, CHA intended to set its monthly rental subsidy at the average rent in the submarket in which the development is located. A portion of the rent would be paid by the PEL amount, but if the PEL is below the average rent in the submarket, or if the PEL is not fully funded in any given year, CHA would use MTW single fund budget to make up the difference. This would allow CHA to put unused public housing units on the ground (up to the statutory cap) and receive the related capital fund allocations.

This initiative was not implemented and will be removed in FY11 because it is no longer economically feasible. In order to make the initiative beneficial, the subsidy structure would need to extend beyond the MTW period. This would require the creation of a reserve which is impractical given the size needed.

B. Provide detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.

The Charlotte Housing Authority is unable to report on any benchmarks or outcomes because the activity will not be implemented.

C. If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.

This initiative was not implemented and will be removed in FY11 because it is no longer economically feasible. In order to make the initiative beneficial, the subsidy structure would need to extend beyond the MTW period. This would require the creation of a reserve which is impractical given the size needed.

D. If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact (e.g. after 2 years of rent reform only 6 hardship cases).

The benchmark and metric have not been revised.

E. If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.

The data collection methodology has not changed.

F. If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.

No new authorizations were added.

G. Cite the specific provision(s) of the Act or regulation that is waived under MTW (as detailed in Attachment C or D of this Restated Agreement) that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.

Attachment C: C.7. and B.1.b.ii and Attachment D, Use of Funds. The waiver was necessary to allow regulatory relief and to use funds outside of Section 8 and 9.

Use Single Fund Funding Flexibility to Develop Additional Units

A. List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.

CHA was approved to implement an initiative to Use Single Fund Funding Flexibility to Develop Additional Units in FY09. This initiative involved using block grant funding to leverage financing for the development of affordable housing units. CHA will no longer be reporting on this activity as an individual initiative because 1) the unit count is duplicated from the Increasing the Acquisition/Rehabilitation of Existing Multi-Family Properties and 2) HUD requires reporting on activities that only employ single-fund flexibility (authorization B.1. of Attachment C) in Section VII.E. of the Plan/Report, as opposed to including such activities in Sections V/VI.

B. Provide detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.

See A.

C. If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.

See A.

D. If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact (e.g. after 2 years of rent reform only 6 hardship cases).

See A.

E. If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.

See A.

F. If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.

No new authorizations were added.

G. Cite the specific provision(s) of the Act or regulation that is waived under MTW (as detailed in Attachment C or D of this Restated Agreement) that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.

Attachment C: B. 1. b. The waiver was necessary to use MTW funds to develop additional units.

Land Acquisition for Future Affordable Housing

A. List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.

CHA was approved to implement Land Acquisition for Future Affordable Housing in FY09. The Charlotte Housing Authority requested and was approved for the ability to option and purchase land (or sites appropriate for demolition and/or rehab) without funded development plans in place. CHA will certify that it has met the HUD Site Selection Standards.

B. Provide detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.

The benchmark was to acquire one site at least every two years which would provide a development opportunity of a minimum of 50 units. In FY09, CHA acquired a multi-family site that will accommodate 99 units. The site was 10 acres at \$90K/acre. In FY10, CHA acquired land to develop 120 units of senior housing. The cost for the land averages \$8,810 per unit. The Charlotte Housing Authority metric for the number of sites acquired and the number of units the land acquisition will accommodate resulted in cost savings due to current market conditions and the opportunity to control land early in the development process. This activity is on schedule.

- C. **If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.**

The benchmark was achieved and the activity was determined effective.

- D. **If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact (e.g. after 2 years of rent reform only 6 hardship cases).**

Neither the benchmarks nor metrics have been revised.

- E. **If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.**

The data collection methodology has not changed.

- F. **If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.**

No new authorizations were added.

- G. **Cite the specific provision(s) of the Act or regulation that is waived under MTW (as detailed in Attachment C or D of this Restated Agreement) that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.**

Attachment C: C 13. The waiver was necessary to remove the HUD approval layer in order to move in a timely, cost efficient manner in acquiring properties.

Develop an Affordable Housing Program with Charlotte-Mecklenburg Schools

- A. **List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.**

CHA was approved to **Develop an Affordable Housing Program with Charlotte-Mecklenburg Schools (CMS)** in FY09. This initiative was designed to produce mixed income affordable housing units at school sites. Due to budget cuts within CMS, this activity has not been implemented. CHA would like to note that this initiative's only waiver is the single fund flexibility. However, the initiative is innovative and the units may not be the same as those counted in the other activities.

- B. **Provide detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.**

In FY09, CHA met its goal to identify one site that will be feasible for CHA/CMS development. No new benchmarks were set for FY10 because CMS did not feel it could make financial commitments to affordable housing in that budget year. CHA is unable to assess the outcomes because the activity has not been implemented. This activity is not on schedule.

- C. **If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.**

The challenge in achieving the benchmark was the budget cuts experienced by Charlotte-Mecklenburg Schools. CHA staff continues to work closely with CMS staff in planning developments and exploring partnership opportunities.

D. If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact (e.g. after 2 years of rent reform only 6 hardship cases).

Neither the benchmarks nor metrics have been revised.

E. If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.

The data collection methodology has not changed.

F. If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.

No new authorizations were added.

G. Cite the specific provision(s) of the Act or regulation that is waived under MTW (as detailed in Attachment C or D of this Restated Agreement) that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.

Attachment C: B. 1. b. The waiver was necessary for flexibility of funds.

INCREASE HOUSING CHOICE INITIATIVES

Site-Based Waiting Lists for Public Housing and Project-Based Section 8

A. List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.

CHA was approved to implement ***Site-Based Waiting Lists for Public Housing and Project-Based Section 8*** in FY09. Maintaining site-based waiting lists allows applicants to choose developments they want to reside in and apply on site. Waiting lists are managed at the site-level. Project Based Section 8 applicants are not chosen from the Authority’s master Section 8 waiting list.

B. Provide detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.

The applicants receive three offers before they are taken off all the lists they may have put their name on. Applicants may sign up at any of the 27 conventional public housing developments.

	FY08	FY09	FY10
Total Removed	1,485	480	821
Number of applicants removed for not accepting offer*	871	190	326
Percent of applicants removed for not accepting offer	58%	40%	40%

*Received 3rd offer, failed to attend preliminary, failed to provide necessary documentation, declined offer from site, no response to offer from site, did not want public housing, failed to lease unit

CHA’s benchmark was to have a reduction of 2.75% of first offers rejected. The software system is not in place to track first offers rejected, however, the number of applicants removed for not accepting an offer had an 18% decrease.

This activity is on schedule; however, a simplified tracking report of the offers/rejections in the software system is not on schedule.

- C. **If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.**

The site based waiting list is determined effective since the number of removals has decreased.

- D. **If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact (e.g. after 2 years of rent reform only 6 hardship cases).**

Neither the benchmarks nor metrics have been revised.

- E. **If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.**

The data collection methodology has not changed.

- F. **If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.**

No new authorizations were added.

- G. **Cite the specific provision(s) of the Act or regulation that is waived under MTW (as detailed in Attachment C or D of this Restated Agreement) that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.**

Attachment C: C and Attachment C: D. 4. The waiver is necessary because it authorizes the Agency to implement a locally designed waiting list system that provides applicants with a reasonable choice of location.

Occupancy Training

- A. **List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.**

CHA was approved to implement Occupancy Training in FY08. The Charlotte Housing Authority (CHA) is under contract with Central Piedmont Community College (CPCC) to provide a mandated "Good Neighbors" training to all applicants entering the program and for all existing participants. The training is designed to assist families acclimate into a neighborhood. Participants learn more about being a "Good Neighbors" by focusing on topic such as building codes and standards, property maintenance, basic zoning regulations, home maintenance, and conflict resolution.

- B. **Provide detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.**

A revised "Good Neighbors" Training program has been developed and is currently in the review process. The revised "Good Neighbors" Training program will be required for all public housing and Section 8 heads of household. The revised "Good Neighbors" Training program will also focus on factors to consider when selecting a neighborhood.

In FY 2010, 498 Section 8 participants completed "Good Neighbors" Training. The Section 8 Department experienced an increase in the number of recommendations for tenant terminations as a result of the new recertification procedure that requires annual criminal background screenings for all household members 16 and older. This new process has resulted in the removal of individual household members that have committed criminal actions from CHA assisted units. The number of recommendations for tenant

terminations increased from 385 in FY 2009 to 528 in FY 2010. Despite the increase in recommendations, the Section 8 Department experienced a decrease in the number of terminations or End of Participations from 308 in FY 2009 to 209 in FY 2010.

One of the annual benchmarks for the Occupancy Training Initiative was to train 300 participants annually. 498 Section 8 participants completed Good Neighbor Training in FY 2010 exceeding the annual benchmark.



The remaining benchmarks for Occupancy Training were to reduce violations and terminations by 3%. There was a 37.14% increase in the number of recommendations for terminations from the baseline to FY 2010. However, there was a 30.79% decrease in the number of program terminations from the baseline to FY 2010.

SECTION 8 PROGRAM VIOLATIONS AND TERMINATIONS			
	Baseline	FY10	Percent Change
Total # Recommendation for Tenant Termination	385	528	37.14
Total # End of Participation / Terminations	302*	209	-30.79

**Please note that that original baseline for terminations was 126, however; this number only reflected the number of EOPs/terminations processed by the Section 8 Compliance Department. The total number of program terminations for the baseline period of November 2007-August 2008 was 302 according to PIC.*

The CHA met the fiscal year goals regarding the number of participants trained and the reduction in the number of program terminations. However, the Section 8 Department experienced an increase in the number of recommendations for tenant terminations (violations). The increase in the number of recommendations for terminations was the result of the new recertification procedure that requires annual criminal background checks for all household members 16 and older. Although, there was an increase in the number of violations, the number of terminations did not increase because individual household members were removed from the assisted unit and did not require the whole family to be removed from the program.

The revised “Good Neighbors” Training was expected to be implemented in April 2010, however; the revised training curriculum is still in the review process.

- C. **If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.**

The Section 8 Department experienced a decline in the number of Section 8 participants attending “Good Neighbors” Training due to the fact that the Voucher Briefing and “Good Neighbors” training are no longer being held consecutively on the same day. The Section 8 Department felt there was a need to conduct weekly voucher briefings for portable and special program families. To help train more existing program participants, Section 8 staff may require all families that request to transfer to complete “Good Neighbors” Training prior to lease-up.

The number of recommendations for tenant termination (violations) also increased due to the new criminal background screening requirement. It is anticipated that this number will reduce after the first year of this requirement because household members who have committed crimes will be removed for CHA assisted units.

- D. **If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact (e.g. after 2 years of rent reform only 6 hardship cases).**

The new annual benchmark will be to train 3% of all program participants per year until all participants have completed “Good Neighbors” Training.

- E. **If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.**

Terminations/end of participation numbers will now be obtained from the PIC reporting system. A recommendation for a tenant termination module will also be developed to track violations in the Yardi database.

- F. **If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.**

No new authorizations were added.

- G. **Cite the specific provision(s) of the Act or regulation that is waived under MTW (as detailed in Attachment C or D of this Restated Agreement) that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.**

Attachment C: B. 1. b. iii. The waiver is essential to achieving the benchmark because the activity assists families in their transition to various neighborhoods throughout Charlotte and curbs criticism of the program.

ADMINISTRATIVE EFFICIENCIES

Create a Housing Choice Voucher

- A. **List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.**

CHA received approval in the FY10 Annual Plan to create a Housing Choice Voucher form similar to the HUD Form 52646. The revised Housing Choice Voucher form design allows two extensions of the initial voucher term. The revised Voucher form also includes additional family obligations enacted under the Moving

Forward Program such as attendance of mandatory training programs, and adherence to CHA's Truancy policy and work requirement.

B. Provide detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.

A PDF version of the Housing Choice Voucher form was implemented in October 2009. Full Yardi database implementation has been completed and Section 8 staff began using the Yardi database version May 2010.

A survey has also been developed to gauge usability of the new Housing Choice Voucher form. Staff will be evaluated within 6 months of Yardi database implementation.

The annual benchmark was to develop and implement the revised Housing Choice Voucher. CHA completed full implementation in May 2010. Activity complete and revised CHA Housing Choice Voucher has been implemented. Activity is complete.

C. If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.

The benchmark was achieved.

D. If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact (e.g. after 2 years of rent reform only 6 hardship cases).

Neither the benchmarks nor the metrics have been revised.

E. If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.

The data collection methodology has not changed.

F. If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.

The authorization did not change.

G. Cite the specific provision(s) of the Act or regulation that is waived under MTW (as detailed in Attachment C or D of this Restated Agreement) that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.

Financial Incentives

Single Fund Budget with Full Flexibility

A. List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.

CHA was approved to implement Single Fund Budget with Full Flexibility in FY09. By utilizing the single fund budget, CHA is able to determine the areas of greatest need for use of the limited resources. Information on the use of single fund budget with full flexibility can be found in the Sources and Uses Section of the Annual Report.

- B. Provide detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.**

See A.

- C. If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.**

See A.

- D. If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact (e.g. after 2 years of rent reform only 6 hardship cases).**

Neither the benchmarks nor metrics have been revised.

- E. If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.**

The data collection methodology has not changed.

- F. If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.**

No new authorizations were added.

- G. Cite the specific provision(s) of the Act or regulation that is waived under MTW (as detailed in Attachment C or D of this Restated Agreement) that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.**

Attachment C: B. 1.

Adopt Investment Policies Consistent with State Law

- A. List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.**

Adopt Investment Policies Consistent with State Law was approved in the FY09 MTW Annual Plan. CHA began to make investments in the North Carolina Capital Management Trust (NCCMT) during that same fiscal year and will continue this strategy.

- B. Provide detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.**

At the beginning of the fiscal year the trust interest earnings continued to be double the rate we were achieving on our checking accounts and certificates of deposits. As the year progressed, the market downturn slowly plummeted the earnings potential of the trust, and by the end of 2009 the trust rate was lower than our standard investments. Therefore, the amount of funds we had invested in the trust at March 31 was minimal. Even with the downturn, CHA still earned over \$11 thousand more on our investments than we would have under the standard HUD investment policy.

- C. If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.**

The benchmark was achieved and the activity determined effective.

D. If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact (e.g. after 2 years of rent reform only 6 hardship cases).

Neither the benchmarks nor the metrics have been revised.

E. If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.

The data collection methodology has not changed.

F. If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.

The authorization did not change.

G. Cite the specific provision(s) of the Act or regulation that is waived under MTW (as detailed in Attachment C or D of this Restated Agreement) that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.

Attachment C: B. 5. MTW flexibility was required in order to enable the agency to invest in securities eligible under NC state law. This opened up more opportunities with a small amount of risk and higher returns.

Performance Month	HUD Standard interest rate	Achieved interest rate	Additional Interest Earned
Fiscal Year 2009			
October 2008	.92%	2.9%	\$15,422.56
November 2008	.35%	2.5%	\$17,647.41
December 2008	.35%	1.86%	\$12,970.89
January 2009	.35%	1.45%	\$9,530.13
February 2009	.35%	1.08%	\$5,330.25
March 2009	.35%	.97%	\$5,411.58
Fiscal Year 2010			
April 2009	.25%	.85%	\$4,217.23
May 2009	.25%	.70%	\$2,959.10
June 2009	.25%	.59%	\$2,854.97
July 2009	.25%	.49%	\$1,998.07
August 2009	.25%	.33%	\$724.94
September 2009	.25%	.23%	(\$109.05)
October 2009	.25%	.18%	(\$237.32)
November 2009	.25%	.23%	(\$26.21)
December 2009	.25%	.12%	(213.36)
January 2010	.25%	.10%	(252.91)
February 2010	.25%	.06%	(314.42)
March 2010	.25%	.08%	(287.47)

Inspection and HQS Initiatives

Modify Section 8 Inspection Procedures

- A. List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.**

The activity to **Modify Section 8 Inspection Procedures** was approved by HUD and implemented in FY2009. This activity waives the requirement for an initial Housing Quality Standards (HQS) inspection on newly constructed Project Based Section 8 (PBS8) units and utilizes local Building Standards Inspection and subsequent issuance of a Certificate of Occupancy (CO) as a substitution of the initial or move-in inspection.

- B. Provide detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.**

The benchmark was to use this process on 20% of the new units. During April 1, 2009 to March 31, 2010 the agency leased up PBS8 units at Ashley Square; however, the leasing did not begin until March 2010, therefore only 2 of the 14 units leased up during that time frame. The cost savings was \$100 for FY10.

- C. If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.**

The agency achieved the benchmark since the goal was 20% of units leased.

- D. If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact (e.g. after 2 years of rent reform only 6 hardship cases).**

Neither the benchmarks nor the metrics have been revised.

- E. If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.**

The data collection methodology was not changed.

- F. If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.**

The authorization did not change.

- G. Cite the specific provision(s) of the Act or regulation that is waived under MTW (as detailed in Attachment C or D of this Restated Agreement) that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.**

Attachment C: D. 5. The waiver was necessary to forego the HQS inspections.

Section 8 Property Rating System

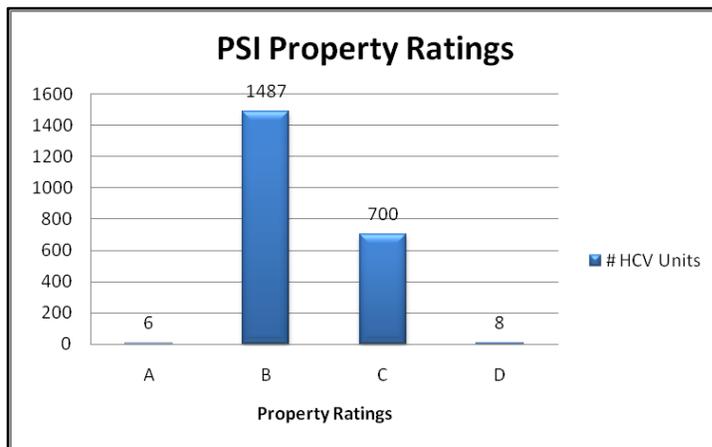
- A. List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.**

The Charlotte Housing Authority was approved to implement a **Section 8 Property Rating System** in FY08. CHA contracted with Professional Service Industries (PSI) to develop a quantitative evaluation system for the exterior appearance of Section 8 properties using the City of Charlotte Code Enforcement Standards and the Department of Housing and Urban Development's Housing Quality Standards. The goal of the property

rating system is for PSI conducts an inspection of the exterior of Section 8 properties (Foundation/structure, walls, roof, windows/doors, and landscaping).

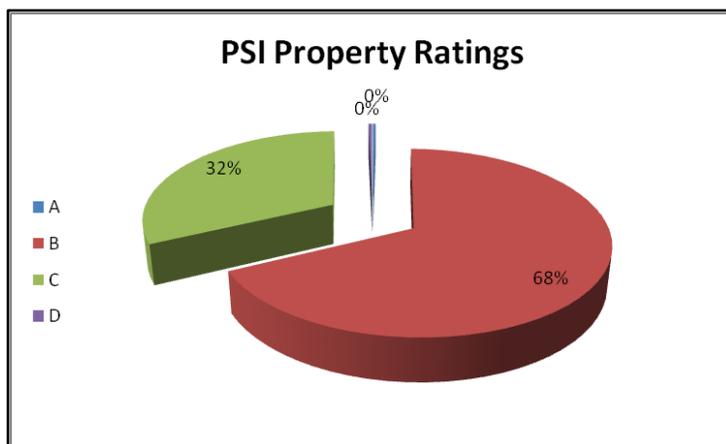
B. Provide detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.

As of April 2010, 2,201 units participating in the Section 8 Program have been rated by PSI. The results indicate that 99.64% of the units sampled have a rating of C or better.



i.

The two annual benchmarks were to have 100% of all properties participating in the Section 8 Program to have an external property rating of C or better and to sample 800 properties per year. The results from Professional Service Industries (PSI) indicate that 99.64% of all properties evaluated have a rating of C or better and 944 exterior inspections were conducted from April 1- March 31, 2010.



CHA met the proposed benchmarks. The contract with Professional Service Industries ended April 31, 2010. CHA is currently incorporating the external evaluating process into the annual HQS inspection process. The CHA Inspection Checklist has been revised to include a Property Rating System. The revised Inspections Checklist was approved in the 2009 Housing and Occupancy Plan (HOP). CHA is currently working with Yardi to input the new metrics for the Property Rating System in the Inspections module so that CHA Inspectors can conduct external inspections in- house. The process of providing rental increases based on inspection score has not been implemented.

- C. **If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.**

The benchmarks were achieved.

- D. **If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact (e.g. after 2 years of rent reform only 6 hardship cases).**

The benchmarks and metrics were not revised.

- E. **If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.**

The Property Rating System will be incorporated into the HQS annual inspection process and property ratings will be given by CHA Inspectors instead of an outside firm. CHA is currently in the process of implementing a new inspections module in the Yardi database.

- F. **If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.**

The authorization was not changed.

- G. **Cite the specific provision(s) of the Act or regulation that is waived under MTW (as detailed in Attachment C or D of this Restated Agreement) that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.**

Attachment C: D. 5. The waiver is necessary to achieve the benchmark because it will result in a tool that staff can use to evaluate properties to ensure that housing under the Section 8 program is maintained at a determined quality standard; thereby increasing the number of quality housing choices for low-income families.

Community Based Rental Assistance Initiatives

Streamline Community Based Rental Assistance

- A. **List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.**

Streamline Community Based Rental Assistance was approved in the FY09 MTW Annual Plan. The Charlotte Housing Authority proposed that simplifying the selection process would make it easier to maximize the number of Project Based Section 8 assisted units in higher quality developments and in a larger number of high-amenity Charlotte neighborhoods. The process will be as follows:

Units Owned by CHA: CHA will project-base Section 8 at properties owned directly or indirectly (through participation as a member in a tax credit or other LLC), subject only to HUD subsidy-layering rules. No process through the local field office will be required. CHA will certify compliance with subsidy layering rules.

Units not owned by CHA: Where CHA is not directly or indirectly an owner, CHA staff will rely on the North Carolina Housing Finance Agency (NCHFA) tax credit process as its competitive process. In non-tax credit deals with local City government funding, CHA will rely on the City's Housing Trust Fund competitive

process. Where no tax credits or City funds are present, but the development has AHP funding, CHA will rely on a competitive process for approval. As long as the units are approved through one of these processes and meet the minimum standards outlined in the attached Community Based Rental Assistance Policy, no process through the local field office is required except to submit the deal for subsidy laying review and approval. Where there is no other competitive process present, CHA has designed its own competitive process and is submitting a description of the process to HUD Headquarters for approval in the attached Community Based Rental Assistance Policy. The criteria mirror the goals of placing units in stable neighborhoods and requiring self-sufficiency programs for family units.

The goal of this initiative is to place as many Community Based Rental Assistance (CBRA) units as possible in the following areas:

- “Stable” communities, as defined by the City of Charlotte’s Quality of Life Study
- Neighborhoods with an active revitalization plan
- Neighborhoods along Charlottes new transportation corridors, including light rail

The neighborhood type is established by the Neighborhood Quality of Life study commissioned bi-annually by the City of Charlotte’s Neighborhood Development Department. The study evaluates social, crime, physical and economic conditions in Charlotte’s neighborhoods and is used by local government to evaluate neighborhood conditions and make changes to improve neighborhood vitality. Neighborhoods are classified as stable, transitioning or challenged. More information can be found at <http://www.charmeck.org/Departments/Neighborhood+Dev/Sustain+Neighborhoods/Quality+of+Life/Home.htm>.

B. Provide detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.

The Charlotte Housing Authority Board of Commissioners voted to approve CBRA projects on a case by case basis. Therefore, there is no proposed benchmark. The metric for the agency is the number of Community Based Rental Assistance units. In FY10, the metric resulted in 21 completed units. There were 10 in the YWCA Families in Transition development and 11 in Cherry Gardens Apartments. The activity is on schedule.

In addition, the number of units approved and in development was 318. The following chart details those units:

DEVELOPMENT	NUMBER OF UNITS
Boulevard Seniors	20
McCreech Place II	26
Mill Pond	51
Moore Place	51
Savanna Woods	10
Steele Creek Seniors	60
Lofts at Seigle Point	38
Woodlawn House	52
Everett House	10

C. If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.

This activity has been determined effective.

- D. If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact (e.g. after 2 years of rent reform only 6 hardship cases).**
Neither the benchmarks nor the metrics have been revised.
- E. If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.**
The data collection methodology has not changed.
- F. If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.**
The authorization did not change.
- G. Cite the specific provision(s) of the Act or regulation that is waived under MTW (as detailed in Attachment C or D of this Restated Agreement) that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.**
Attachment C: D.7. 1 – d. The waiver is necessary to Project Base Section 8 when the site selection is not through a competitive process such as CHA ownership of units.

Housing for Persons with Disabilities, Special Needs and Homeless

- A. List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.**
Housing for Persons with Disabilities, Special Needs and Homeless was approved in the FY09 MTW Annual Plan. The Charlotte Housing Authority expanded their role in the supportive housing community by leveraging funding and resources to social service and supportive housing providers to help alleviate the existing housing burden.
- B. Provide detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.**
CHA does not have an annual benchmark for this initiative. The goal was to have 300 units by 2012. The metric is to increase the number of projects built, financed or rehabilitated for the targeted population. As a result of the metric, CHA has increased housing choices for persons, as well as created additional units. In FY09 CHA reported the addition of 58 units. An additional 108 have been added for FY10.

DEVELOPMENT	NUMBER OF UNITS
Completed	
YWCA Families in Transition	10
Cherry Gardens	11
In Development	
McCreesh Place II	26
Moore Place	51
Everett House	10

- C. **If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.**

The agency has determined the activity effective.

- D. **If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact (e.g. after 2 years of rent reform only 6 hardship cases).**

Neither the benchmarks nor the metrics have been revised.

- E. **If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.**

The data collection methodology has not changed.

- F. **If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.**

The authorization did not change.

- G. **Cite the specific provision(s) of the Act or regulation that is waived under MTW (as detailed in Attachment C or D of this Restated Agreement) that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.**

Attachment C: D. 1 – 4. The waiver is necessary to alter operational and policy procedures for the assistance the agency will provide to supportive housing providers.

Safety Initiatives

Resident Safety Initiatives

- A. **List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.**

CHA was approved to implement **Resident Safety Initiatives** in the FY10 MTW Annual Plan. The initiatives were designed to decrease Part I crimes in CHA's public housing communities to enable CHA to attract and retain residents in all CHA communities. Part 1 crime includes robbery, homicide, rape, and serious assault.

- B. **Provide detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.**

The Resident Safety Initiatives benchmark is to have a 5% decrease. The baseline was set at 965 based on the 2007 calendar year reporting, however, the baseline has been readjusted since the data for calendar year 2008 has been received (See E.). FY09 recorded 1,052 incidents and the actual achievement in FY10 was 855 (19%). The decrease in crimes was attributed to collaboration and partnering with the Charlotte-Mecklenburg Police Department (CMPD), education, and strengthening of the relationship between investigators and CMPD with the residents.

The resulting impact of reduction in crimes is more specifically reported as follows:

Property Type	FY09	FY10	%c change
Elderly Site	149	100	33%▼
Large Family Site	638	481	25%▼
Scattered Site	265	274	3%▲
Overall	1,052	855	19%▼

CHA contracted with private security at the elderly sites and one large family site; placed surveillance cameras at the high rise sites; and off duty at the remaining two large family sites. The resulting outcome was supported through resident safety surveys conducted at the sites. There was a response rate of 20% to the survey and overall, the majority of respondents reported feeling safe living in their community.

Implementation and monitoring of the activity is on schedule.

- C. If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.**

CHA exceeded the benchmark. However, note that the percentage of Part I crimes increased at the scattered sites. Staff is analyzing the types of crimes at the sites that had an increase and will develop target activities to address those issues.

- D. If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact (e.g. after 2 years of rent reform only 6 hardship cases).**

Neither the benchmarks nor the metrics have been revised.

- E. If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.**

CHA received data from CMPD at the end of the calendar year until Sept 2009. Now, the agency is able to receive incident reports monthly, which will help identify trends earlier, as well as have a more accurate count aligning with the agency fiscal year, instead of the calendar year.

- F. If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.**

The authorization did not change.

- G. Cite the specific provision(s) of the Act or regulation that is waived under MTW (as detailed in Attachment C or D of this Restated Agreement) that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.**

Attachment C: B.1.b.v. MTW flexibility was needed to enable funding of the activities.

Self-Sufficiency Initiatives

Currents of Change

- A. List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.**

Currents of Change was approved by HUD in the FY 2009 MTW Annual Plan. The initiative was implemented in the approved fiscal year and will be ongoing. Currents of Change offers job education and job training programs in three tiers based on participant needs. Tiers include basic building blocks, resources needed to enter his/her chosen career and assistance obtaining sustained income and housing independence. CHA collaborates with other service agencies to coordinate the delivery of services for our participants as they take the voyage from dependency to self-reliance. This also includes contracted case management due to the volume of families that will be required to participate in Currents of Change. Currents of Change is currently being implemented at three public housing sites: Pilot A - Claremont & Victoria Square, Pilot B - Boulevard Homes, and Pilot C – Leafcrest, Tarlton Hills, and Cedar Knoll, is pending, however, the baselines and metrics are consistent with Groups A & B. There are seven (7) metrics, baselines and benchmarks for this initiative. Modifications were made during the 3rd quarter to the Currents of Change Strategic Operating Plan and Action Plan to clarify the program.

- B. Provide detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.**

For Pilot Group A there has been a slight decrease in wage progression due to changes from full to part time employment which reflects the current economic conditions. However, the slight increase in part time employment (increased from 16 to 31) and working households (increased from 36 to 48) reflects an increase in education/training which supports and promotes the work and self-sufficiency objective, as well as a new work requirement policy for new move ins. There were 11 move outs during the fiscal year, which exceed the benchmark of 8. These move outs occurred either due to end of contract, families were at a point to make the transition to the private market, or the MTW program participation motivated movement in the families. All of the 11 households moved to market rate housing.

The RFP process for Pilot Group B was completed during the 3rd Quarter and a service provider was selected. The contractor, Youth Homes Inc has been trained to enter the data in CHA's software system. Due to the late start in the fiscal year, no outcome data is available to present for this pilot group. Implementation with Group C has not yet begun. The selection criterion for Pilot Group C is being established at this time. The baseline for Pilot Group C is also in development. The RFP process is in progress to select the next contracted case management agency.



The activity is on schedule.

- C. If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.**

CHA was shy of the employment benchmark for full and part time employment. In addition, the wage progression was also negatively impacted by changes in employment status. Both are attributed to no sanctions for non-compliance prior to implementation of the new policy at the site, as well as economic recession. CHA proposes to ensure that existing and new residents understand the policy and possible sanctions; staff will reiterate the goals of the program on a constant basis; as well as connect the customers to more resources such as staffing agencies.

- D. If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact (e.g. after 2 years of rent reform only 6 hardship cases).**

The proposed benchmarks and metrics for this activity were changed in the FY11 Moving Forward Annual Plan. They are attached in the Appendices.

- E. If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.**

The data collection methodology has not changed.

- F. If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.**

The authorization did not change.

- G. Cite the specific provision(s) of the Act or regulation that is waived under MTW (as detailed in Attachment C or D of this Restated Agreement) that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.**

Attachment C: B.1. The authorization is required for single fund budget flexibility.

Youth Services

- A. List activities continued from the prior Plan year(s); specify the Plan Year in which the activity was first identified and implemented.**

The Youth Services initiative was approved in the FY09 MTW Annual Plan. CHA implemented the initiative and corresponding activities during that same fiscal year. This initiative will be ongoing. CHA will connect participants to programs and services that address truancy, post-secondary education preparation, and academic performance improvement.

- B. Provided detailed information on the impact of the activity and compare against the proposed benchmarks, and metrics to assess outcomes, including if activity is on schedule.**

Youth Services Initiative will be implemented and tracked based on the Pilot sites listed in the Currents of Change activity. There were five (5) metrics finalized and determined for the Youth Services component of Currents of Change. Modifications were made during the last quarter to the Currents of Change Strategic Operations Program and Action Plan to clarify the program. The baseline and benchmarks are in development. The RFP process for Pilot Group B was completed during the 3rd Quarter and a service provider was selected. Outcome tracking with Group A & B has not yet begun because the baseline is in development. Implementation with Group C has not yet begun. The selection criterion for Pilot Group C is being established at this time.

Prior to aligning the services with those communities receiving comprehensive case management, CHA had several partnerships in place that would impact the program results in the future.

1. The agency modified the lease agreement to include a Truancy Policy. However, full implementation has not taken place because the agency has to further resolve the timeline and process of sanctions to synchronize seamlessly with Charlotte-Mecklenburg Schools' (CMS) Truancy Plan communications and actions with families on truancy. As designed, CHA could have sanctioned families faster than the assistance and due diligence offered by CMS would have been completed.
2. CHA has contracted with Communities In Schools (CIS) to provide dropout prevention services to CHA students at 2 middle schools and 2 high schools in the Charlotte community. CIS' contract began in July 2009, but students were not enrolled until December 2009. This late implementation coupled with CMS not being able to complete identification of CHA students' admissions data, negatively impacted the possible results for this year. Moreover, CMS graduation rate) data will not be available until October of 2010 for several reasons including summer school programs. Because of this, CIS cannot provide complete data at this time. Once the data is released, CHA anticipates comparing those in the CIS program to those not receiving the services to determine the effectiveness of the partnership.
3. CHA had proposed to implement an Achievement Academy for 6th graders in order to positively impact student's grades and potential to transition to middle and high school smoothly and with a focus on high school graduation. However, the program has been delayed until we are able to resolve data sharing issues. The data sharing capacity will allow CHA to identify schools where a majority of the students are located as well as their performance to create the appropriate program.
4. The Charlotte Housing Authority Scholarship Fund (CHASF) has one funding cycle per year. The application period occurs between December – March. The CHASF Board makes scholarship decisions in June. In August 2009, the Scholarship Fund awarded a total of \$120,947 to 62 students. There was a decrease in the number of students receiving scholarships due to retention issues and those who graduated from college during the fiscal year, but there were an additional 24 new students entering the program.
5. The agency does not have an agreement with Partners In Out of School Time (POST), but is exploring a School Matters proposal that targets gang and dropout prevention.
6. CHA has not been able to implement or partner for a mentoring program due to local agencies not having the capacity to add additional youth at this time. We will be exploring the possibility of helping some agencies to increase their capacity in order to serve our youth.

The impact has not been determined, but the program is moving in the right direction of further improving kids in school. The activity is on schedule.

C. If benchmarks were not achieved or if the activity was determined ineffective, provide a narrative explanation of the challenges, and, if possible, identify potential new strategies that might be more effective.

Despite the fact that CHA adjusted the metrics and benchmarks from the FY10 Moving Forward Annual Plan, the ability to share data with CMS has delayed outcome measuring. CHA hopes to have all release forms signed and resolution with the CMS legal department by fall 2010. There was also a challenge in recruiting students to participate in the Communities in School Program because the agency did not know which schools to target and students do not want to be easily identifiable at their school as public housing or Section 8 participants. When CIS submitted names of students they felt were CHA participants, it was hard for CHA to confirm participation because the school location attendance was not in our software system.

There is currently a 20% attrition rate for CHASF students. For the Scholarship Fund, students do not participate in the program until they receive a scholarship. The Scholarship Fund will begin implementing workshops on college preparedness to increase retention in college. Also, an educational component will be provided to ensure students are aware they have to reapply each year for the scholarship funds.

D. If benchmarks or metrics have been revised; identify any new indicator(s) of activities status and impact.

There were five (5) metrics finalized and determined for the Youth Services component of Currents of Change. The benchmarks were changed in October 2009 to address more youth and education focus. The baselines are in development. The new indicators are reported in the Appendices with Currents of Change.

E. If data collection methodology has changed, describe original data collection methodology and any revisions to the process or change in data collected.

There have been no data collection changes, however, the agency is strongly gearing towards a school-based approach where the students will be tracked whether they are at a target school or not.

F. If a different authorization from Attachment C or D was used than was proposed in the Plan, provide the new authorization and describe why the change was necessary.

The authorization has not changed.

G. Cite the specific provision(s) of the Act or regulation that is waived under MTW that authorized the Agency to make the change, and briefly describe if and how the waived section of the Act or regulation was necessary to achieve the MTW activity.

Attachment C: B.2. The authorization enables the agency to incentivize partnerships.

VII. Sources and Uses of Funding

SOURCES OF FUNDS

This section indicates how well resources were managed within the confines of how resources were expected to be expended. We are comparing the original budget (per the MTW Annual Plan) to our actual spending for the fiscal year April 2009 to March 2010. Note, during the year our Board of Commissioners allows the allocation of funds for projects that were not anticipated for the year. These changes to the budget are seen in the Revised Budget Per Draft Audit column. Also included in that column are the administrative budget changes that we made during the year. These budget changes allowed us to reallocate budgeted expense money to different lines items within major categories so that we are able to stay within our spending limits. While in some instances it may appear we spent more than budgeted by major category, a look at the revised budget column shows that we have reallocated resources to ensure that overspending by category did not occur.

MTW

EXHIBIT A

MOVING TO WORK FUNDS SOURCES OF FUNDS	2009-2010 REVISED BUDGET (PER DRAFT AUDIT)	2009-2010 ORIGINAL BUDGET (PER MTW PLAN)	2009-2010 ACTUAL (PER DRAFT AUDIT)	VARIANCE ORIGINAL BUDGET TO ACTUAL	
Administrative Fees	1,964,937	2,423,639	1,969,045	(454,594)	A
Public Housing Revenues	11,738,620	11,006,553	11,738,706	732,153	A
Section 8 Fees	40,169,002	40,169,002	40,913,369	744,367	A
Capital Fund	4,964,626		13,396,732	13,396,732	A
Interest Income	347,457	347,457	389,840	42,383	B
Other Sources	23,424,039	16,812,047	-	(16,812,047)	C
TOTAL SOURCES OF FUNDS	82,608,681	70,758,698	68,407,692	(2,351,006)	

VARIANCE ANALYSIS

- A. Administrative fees were estimated. Fees were later adjusted after final notification from HUD. Section 8 and Public housing subsidies were estimated lower than funding received. Capital fund income was not included in the original budget. Funds shown represent 2007, 2008 and 2009 Capital Fund grants.
- B. Interest income was more than anticipated.
- C. Fund Balance was not appropriated.

CENTRAL OFFICE COST CENTER (COCC)

EXHIBIT B

CENTRAL OFFICE COST CENTER SOURCES OF FUNDS	2009-2010 REVISED BUDGET (PER DRAFT AUDIT)	2009-2010 ORIGINAL BUDGET (PER MTW PLAN)	2009-2010 ACTUAL (PER DRAFT AUDIT)	VARIANCE ORIGINAL BUDGET TO ACTUAL	
Public Housing Revenues	1,900,155	1,900,155	1,898,057	(2,098)	A
Section 8 Fees	998,712	998,712	963,515	(35,197)	A
Horizon Fees	352,956	352,956	269,316	(83,640)	A
Mixed Finance Fees	93,720	93,720	93,720	-	
Relocation Fees	954,972	835,704	746,173	(89,531)	B
Hoefener Fees	39,612	39,612	35,553	(4,059)	C
Maintenance Operations Revenue	585,767	585,767	547,582	(38,185)	D
Investment Income	43,000	43,000	7,144	(35,856)	E
Bond Issuance Fees	145,000	145,000	-	(145,000)	F
Capital Fund Income	533,897	533,897	1,085,522	551,625	G
Other Income	288,409	288,409	298,903	10,494	H
Quality Control Revenue	-	-	120,388	120,388	I
ARRA Grant Fee Income	-	-	169,178	169,178	J
Construction Management Fee	-	-	222,890	222,890	J
MTW Management Fee	176,280	176,280	177,444	1,164	K
Other Sources	265,756	-	-	-	
TOTAL SOURCES OF FUNDS	6,378,237	5,993,212	6,635,383	642,173	

VARIANCE ANALYSIS

- A. Property management and bookkeeping fees are based on actual units occupied and vouchers utilized during the year which was slightly less than budgeted. Property management, bookkeeping and asset management fees were not allowed for one Horizon Development Properties, Inc. property.
- B. The City Relocation Program received fewer participants from the City this fiscal year.
- C. Hoefener fees are less than budgeted because fees were based on a percentage of total expenses which was less than budgeted.
- D. Less than anticipated use of centralized maintenance services. On site staff is performing more maintenance work.
- E. Investment income less than budgeted due to inter program loans.

- F. No bonds were issued.
- G. Capital fund fees were received for the 2008 and 2009 Capital Fund Grants.
- H. Miscellaneous revenue from benefit reimbursement, scrap sales and ROSS administrative fees were more than anticipated.
- I. Our Asset Management Department performs bond monitoring and property management oversight for some of our privately managed sites. These fees were not in the original budget.
- J. ARRA and Construction Management fees were not in the original budget.
- K. MTW management fee was higher because units were added during the fiscal year.

ASSET MANAGEMENT PROJECTS

EXHIBIT C

ASSET MANAGEMENT PROJECTS SOURCES OF FUNDS	2009-2010 REVISED BUDGET (PER DRAFT AUDIT)	2009-2010 ORIGINAL BUDGET (PER MTW PLAN)	2009-2010 ACTUAL (PER DRAFT AUDIT)	VARIANCE ORIGINAL BUDGET TO ACTUAL	
Tenant Rental Revenue	4,690,763	4,520,473	4,946,478	426,005	A
Other Resident Income i.e. Late Fees, Excess Utilities	336,123	212,871	483,741	270,870	B
Other Revenue	2,177,137	1,721,325	2,076,349	355,023	C
Other Sources	23,301,637	17,699,368	15,461,155	(2,238,212)	D
TOTAL SOURCES OF FUNDS	30,505,660	24,154,035	22,967,723	(1,186,312)	

VARIANCE ANALYSIS

- A. Minimum rents increased.
- B. Other resident income was more than budgeted especially in excess utilities, court fees and late fees.
- C. Other revenue increased due to the inclusion of Capital Fund Grant fee which was not in the original budget.
- D. No fund balance appropriated.

SECTION 8

EXHIBIT D

SECTION 8 SOURCES OF FUNDS	2009-2010 REVISED BUDGET (PER DRAFT AUDIT)	2009-2010 ORIGINAL BUDGET (PER MTW PLAN)	2009-2010 ACTUAL (PER DRAFT AUDIT)	VARIANCE ORIGINAL BUDGET TO ACTUAL	
Housing Assistance Payments	943,179	-	881,295	881,295	A
Administrative Fees – Vouchers	58,350	-	3,986	3,986	A
Housing Assistance Payments – Portability	2,400,682	-	3,022,301	3,022,301	B
Administrative Fees – Portables	175,000	175,000	278,880	103,880	B
Interest Income	10,000	10,000	7,677	(2,323)	C
Other Revenue	157,600	157,600	292,109	134,509	D
Other Sources	34,004,538	34,004,538	30,786,440	(3,218,098)	E
TOTAL SOURCES OF FUNDS	37,749,349	34,347,138	35,272,688	925,550	

VARIANCE ANALYSIS

- A. Boulevard vouchers, additional Family Unification and Veterans Administration vouchers were not budgeted in the original Section 8 budget.
- B. Portable revenues and expenses were separated based on HUD regulations. More participants ported to Charlotte than anticipated.
- C. Interest income less than projected.
- D. Fraud recovery increased because of increased staff and a renewed effort in compliance.
- E. Less than budgeted amount transferred from MTW funds. Transferred amount was based on Section 8 expenditures.

HORIZON DEVELOPMENT PROPERTIES, INC.

EXHIBIT E

HORIZON DEVELOPMENT SOURCES OF FUNDS	2009-2010 REVISED BUDGET (PER DRAFT AUDIT)	2009-2010 ORIGINAL BUDGET (PER MTW PLAN)	2009-2010 ACTUAL (PER DRAFT AUDIT)	VARIANCE ORIGINAL BUDGET TO ACTUAL	
Net Tenant Rental Revenue	2,812,595	2,130,322	2,731,176	600,854	A
Other Income	1,908,394	1,902,320	1,413,358	(488,962)	B
Restricted Donations	450,406		365,394	365,394	C
Subsidy	256,344		197,787	197,787	D
Other Sources	2,162,703	168,779	1,000,000	831,221	E
TOTAL SOURCES OF FUNDS	7,590,442	4,201,421	5,707,715	1,506,294	

VARIANCE ANALYSIS

- A. Additional properties added since the original budget was established.
- B. Other Income less than budgeted because developer fees and other revenue not received.
- C. Restricted Donations represent funds used for the Hall House Homeless Initiative. Received less funding than budgeted. Restricted Donations were not included in the original budget.
- D. Subsidy from project based Section 8 property was less than budgeted because it is based on occupancy. Adjustments were also made to subsidy during the year.
- E. Favorable variance due to revenue received to purchase the Krefeld property. This item was not included in the original budget.

CAROLE HOEFENER CENTER

EXHIBIT F

CAROLE HOEFENER CENTER SOURCES OF FUNDS	2009-2010 REVISED BUDGET (PER DRAFT AUDIT)	2009-2010 ORIGINAL BUDGET (PER MTW PLAN)	2009-2010 ACTUAL (PER DRAFT AUDIT)	VARIANCE ORIGINAL BUDGET TO ACTUAL	
Non Dwelling Rent	266,040	266,040	270,970	4,930	A
Other Sources	36,913	36,913		(36,913)	B
TOTAL SOURCES OF FUNDS:	302,953	302,953	270,970	(31,983)	

VARIANCE ANALYSIS

- A. The actual revenue was more than anticipated from office space rental, Mecklenburg County Parks and Recreation and the daycare center.
- B. Fund balance was not appropriated.

HORIZON ACQUISITION CORP.

EXHIBIT G

HORIZON ACQUISITION SOURCES OF FUNDS	2009-2010 REVISED BUDGET (PER DRAFT AUDIT)	2009-2010 ORIGINAL BUDGET (PER MTW PLAN)	2009-2010 ACTUAL (PER DRAFT AUDIT)	VARIANCE ORIGINAL BUDGET TO ACTUAL	
Property Management Fees	-	-	86,903	86,903	A
Developer Fee	170,461	170,461	47,540	(122,921)	A
Other Revenue	329,539	-	248,766	248,766	A
TOTAL SOURCES OF FUNDS:	500,000	170,461	383,209	212,748	

VARIANCE ANALYSIS

A. Developer Fees were less than budgeted. Fees were only received for Arbor Glen II and South Park Seniors. Other revenue consist of distributions from Arbor Glen II and Prosperity Creek

USES OF FUNDS

Operating expenses are similar for each of the funds. In each case for the major categories, we have remained within the budgeted parameters. As stated earlier, administrative budget changes were done to allow a reallocation of budgeted expense money to different line items within major categories. This reallocation allows us the ability to stay within our spending limits. A brief description of expenses by major category follows.

Administrative expenses are those expenses such as salaries, benefits and other sundry expenses - telephones, office supplies and training for site managers, consulting services, housing specialist in our Section 8 program etc.

Tenant and Social Services represent those cost associated with staff that provides case management to our residents. Those costs also include salary/ benefits, sundry expenses and security contracts.

Maintenance represent all cost associated with maintenance of the properties. Staff salaries, materials and outside contract services such a pest control and lawn care.

Protective Services represents the cost associated with the Resident Safety area. These costs include staff salary, benefits and other sundry expenses.

Other General represents those costs for insurance- auto and property, bad debt and indirect public housing charges.

MOVING TO WORK

EXHIBIT H

MOVING TO WORK FUNDS USES OF FUNDS	2009-2010 REVISED BUDGET (PER DRAFT AUDIT)	2009-2010 ORIGINAL BUDGET (PER MTW PLAN)	2009-2010 ACTUAL (PER DRAFT AUDIT)	VARIANCE ORIGINAL BUDGET TO ACTUAL	
Administrative	1,466,544	923,013	1,205,258	282,245	A
Resident Services	351,280	176,280	181,470	5,190	B
Implementation of MTW Initiatives	4,639,243				
TOTAL OPERATING EXPENSES	6,457,067	1,099,293	1,386,728	287,435	
Other Items	76,151,614	69,659,405	49,232,902	(20,426,503)	C
TOTAL USES OF FUNDS	82,608,681	70,758,698	50,619,631	(20,139,068)	

VARIANCE ANALYSIS

- A. Projects approved by the Board of Commissioners were added after the original budget was adopted and spending for those projects were not at budgeted levels.
- B. Spending for security deposits for tenants relocating from Boulevard Homes, which was approved after the original budget was approved, represents the overage.
- C. Transfer of funds to Public Housing and Section 8 were less than budgeted. Funds were not transferred for various capital projects that were budgeted.

CENTRAL OFFICE COST CENTER (COCC)

EXHIBIT I

CENTRAL OFFICE COST CENTER USES OF FUNDS	2009-2010 REVISED BUDGET (PER DRAFT AUDIT)	2009-2010 ORIGINAL BUDGET (PER MTW PLAN)	2009-2010 ACTUAL (PER DRAFT AUDIT)	VARIANCE ORIGINAL BUDGET TO ACTUAL	
Administrative	4,604,682	4,413,487	4,262,831	(150,656)	A
Tenant and Social Services	749,817	630,790	507,744	(123,046)	B
Ordinary Maintenance and Operation	514,543	540,459	463,537	(76,922)	C
Utilities	61,700	56,300	52,461	(3,839)	D
General Expenses	253,245	207,177	75,382	(131,795)	E
TOTAL OPERATING EXPENSES	6,183,987	5,848,212	5,361,955	(486,257)	
Other Uses	194,250	145,000	48,946	(96,054)	F
TOTAL USES OF FUNDS	6,378,237	5,993,212	5,410,901	(582,311)	

VARIANCE ANALYSIS

- A. Favorable variance due to less than budgeted sundry expenses. Training, non-capital computer equipment/software and professional services make up the largest portion of the underage in sundry expenses.
- B. Favorable variance due to less than budgeted relocation cost in the City Relocation program.
- C. Spending was less than budgeted in HVAC contract, landscape maintenance and vehicle maintenance.
- D. Under budget in all utility areas. Electricity had the greatest variance.
- E. Favorable variance because funds were not utilized for the Mews infrastructure project.
- F. Favorable variance due to less than budgeted spending for capital items and no bonds were issued.

ASSET MANAGEMENT PROJECTS

EXHIBIT J

ASSET MANAGEMENT PROJECTS USES OF FUNDS	2009-2010 REVISED BUDGET (PER DRAFT AUDIT)	2009-2010 ORIGINAL BUDGET (PER MTW PLAN)	2009-2010 ACTUAL (PER DRAFT AUDIT)	VARIANCE ORIGINAL BUDGET TO ACTUAL	
Administrative	4,412,820	4,251,238	3,944,272	(306,966)	A
Tenant and Social Services	4,198,043	3,545,230	3,434,281	(110,949)	B
Utilities	4,028,553	3,728,669	3,888,580	159,911	C
Ordinary Maintenance and Operation	6,713,867	5,813,804	5,675,830	(137,974)	D
Protective Services	1,279,634	1,297,150	905,466	(391,684)	E
General Expenses	5,469,386	1,922,098	4,511,593	2,589,495	F
OPERATING EXPENSES:	26,102,303	20,558,189	22,360,023	1,801,834	
Other Items	4,403,357	3,595,846	2,373,102	(1,222,744)	H
TOTAL USES OF FUNDS	30,505,660	24,154,035	24,733,125	579,090	

VARIANCE ANALYSIS

- A. Favorable variance due to less spending across all categories.
- B. Less than budgeted spending in MTW programs.
- C. Utility costs more than budgeted. Administrative budget changes reallocated funding to cover increased utility expenses.
- D. Fewer move outs than anticipated and less site and contract work needed than expected.
- E. Some security initiatives were delayed at some of the sites.

F. Additional expenditures for Board approved projects created overage especially in the Loans to Other category.

G. Subsidy transferred to Private Managers was less than expected.

SECTION 8

EXHIBIT K

SECTION 8 USES OF FUNDS	2009-2010 REVISED BUDGET (PER DRAFT AUDIT)	2009-2010 ORIGINAL BUDGET (PER MTW PLAN)	2009-2010 ACTUAL (PER DRAFT AUDIT)	VARIANCE ORIGINAL BUDGET TO ACTUAL	
Administrative	3,733,456	3,753,956	3,053,071	(700,885)	A
Tenant and Social Services	1,508,008	1,508,158	893,202	(614,956)	B
Ordinary Maintenance and Operation	95,750	58,750	37,590	(21,160)	C
Housing Assistance Payments	32,143,861	28,800,000	30,898,419	2,098,419	D
Protective Services	196,825	196,825	150,849	(45,976)	E
General Expenses	29,448	29,448	9,585	(19,863)	F
TOTAL OPERATING EXPENSES	37,707,348	34,347,138	35,042,716	695,578	
Capitalized Items	42,000		40,903	40,903	G
TOTAL USES OF FUNDS	37,749,348	34,347,138	35,083,619	736,481	

VARIANCE ANALYSIS

A. Favorable variance due to vacant positions. Also less than budgeted spending in Professional Consultation expense associated with MTW initiatives.

B. Less than budgeted asset management fee expense and less than budgeted spending in professional consultation, tenant education and training expenses associated with MTW initiatives.

C. Less than budgeted spending for gasoline, vehicle parts and maintenance and inspections.

D. Portable voucher expense budgeted and reflected. Portable voucher expense added after original budget completed.

E. Salary, unemployment benefits and other sundry expenses were less than budgeted.

F. Bad debt recoveries were more than budgeted.

G. Section 8 budget adjusted for the purchase of digital signage and telephone recording equipment.

HORIZON DEVELOPMENT PROPERTIES, INC.

EXHIBIT L

HORIZON DEVELOPMENT USES OF FUNDS	2009-2010 REVISED BUDGET (PER DRAFT AUDIT)	2009-2010 ORIGINAL BUDGET (PER MTW PLAN)	2009-2010 ACTUAL (PER DRAFT AUDIT)	VARIANCE ORIGINAL BUDGET TO ACTUAL	
Administrative	2,631,846	2,021,208	1,927,315	(93,893)	A
Tenant and Social Services	345,805	267,415	262,483	(4,932)	B
Ordinary Maintenance and Operation	1,223,231	961,105	1,149,526	188,421	C
Utilities	519,924	333,463	471,678	138,215	C
Protective Services	120,000	-	117,832	117,832	D
General Expenses	1,749,635	594,451	1,027,948	433,497	E
OPERATING EXPENSES:	7,590,441	4,177,642	4,956,782	779,140	
Other Items	1,023,779	23,779	1,000,000	976,221	F
TOTAL USES OF FUNDS	7,590,441	4,201,421	5,956,782	1,755,361	

VARIANCE ANALYSIS

- A. Board approved amendments for projects in the revised budget eliminated much of the under budgeted spending in professional services and pursuit costs in the Real Estate department
- B. Project expenditures for the IDA did not materialize. The asset management fee for Real Estate is under budget. The fee is calculated as a percentage of total expense. However Board approved amendments for projects eliminated much of the under budgeted spending.
- C. Additional properties added through Board amendments cause overage in maintenance and utilities.
- D. Administrative budget change was done to budget for the expenses associated with the homeless project at Hall House.
- E. Additional expenditures for Board approved projects created overage.
- F. Krefeld land purchase was added as a Board approved project.

CAROLE HOEFENER CENTER

EXHIBIT M

CAROLE HOEFENER CENTER USES OF FUNDS	2009-2010 REVISED BUDGET (PER DRAFT AUDIT)	2009-2010 ORIGINAL BUDGET (PER MTW PLAN)	2009-2010 ACTUAL (PER DRAFT AUDIT)	VARIANCE ORIGINAL BUDGET TO ACTUAL	
Administrative	79,037	80,743	78,239	(2,504)	A
Tenant & Social Services	39,512	39,612	35,553	(4,059)	B
Ordinary Maintenance and Operation	97,539	97,038	96,009	(1,029)	C
Utilities	62,037	71,244	49,065	(22,178)	D
General Expenses	24,828	14,316	24,571	10,255	E
TOTAL USES OF FUNDS	302,953	302,953	283,437	(19,516)	

VARIANCE ANALYSIS

- A. Less than budgeted spending in various sundry expenses accounts.
- B. Favorable variance due to budgeted asset management fee which is calculated as a percentage of total expense.
- C. Favorable variance due to less than budgeted spending in various maintenance material accounts.
- D. Less than budgeted consumption in electricity.
- E. Unfavorable variance reflected and an administrative budget change was done to cover the cost of capital items purchased.

HORIZON ACQUISITION CORP

EXHIBIT N

HORIZON ACQUISITION USES OF FUNDS	2009-2010 REVISED BUDGET (PER DRAFT AUDIT)	2009-2010 ORIGINAL BUDGET (PER MTW PLAN)	2009-2010 ACTUAL (PER DRAFT AUDIT)	VARIANCE ORIGINAL BUDGET TO ACTUAL	
Total Administrative:	500,000	170,461	383,209	214,748	A
TOTAL USES OF FUNDS	500,000	170,461	383,209	214,748	

VARIANCE ANALYSIS

- A. Professional services fees were more than budgeted in the original budget.

Sources and Uses of State & Local Funding

	Grant Award	FYE March 2010 Expenditures
NSP Grant	\$ 2,100,000	\$ 9,336
CATS Bus Pass Grant	\$ 100,859	\$ 23,676
Housing Trust Funds		
Southside Homes	\$ 4,854,310	\$ 1,397,701
Edwin Towers	649,313	14,078
Robinsdale Apartments	548,366	12,723
	\$ 6,051,989	\$ 1,424,503
Total State & Local Funding	\$ 8,252,848	\$ 1,457,515

VIII. Administrative

A. Description of progress on the correction or elimination of observed deficiencies cited in monitoring visits, physical inspections, or other oversight and monitoring mechanisms, if applicable.

This is not applicable to the Charlotte Housing Authority.

B. Results of latest Agency-directed evaluations of the demonstration, as applicable.

The Charlotte Housing Authority contracted the Center for Urban and Regional Studies at the University of North Carolina at Chapel Hill to conduct an ongoing evaluation of the agency's Moving Forward Program.

The objectives of the evaluation of the Charlotte Housing Authority's Moving Forward Program are to monitor its implementation, assess its outputs, and gauge its impacts on both the residents and the Charlotte Housing Authority (CHA). The research questions are:

- What is the model of change behind the Moving Forward Program innovations and what are the key output and outcome measures?
- To what extent have the Moving Forward Program initiatives: (a) achieved greater cost efficiencies; (b) increased housing choices; (c) assisted residents in achieving self sufficiency; and (d) improved the quality of life of CHA residents?
- What are the major obstacles to implementing the Moving Forward Program initiatives and how were they overcome?
- What impacts has participating in the Moving Forward Program had on the CHA and its operations?

These research questions are being addressed with data from the YARDI system, resident satisfaction surveys of CHA residents, and key informant interviews with CHA and partner organization staff members. At the time of this report, these tasks were still being conducted. Therefore, analysis of the initial output and outcome data is not available for reporting.

C. Performance and Evaluation Report for Capital Fund activities not included in the MTW Block Grant, as an attachment to the Report.

This is not applicable to the Charlotte Housing Authority.

D. Certification that the Agency has met the three statutory requirements of: 1) assuring that at least 75 percent of the families assisted by the Agency are very low-income families; 2) continuing to assist substantially the same total number of eligible low-income families as would have been served had the amounts not been combined; and 3) maintaining a comparable mix of families (by family size) are served, as would have been provided had the amounts not been used under the demonstration.

A signed certification statement is an attachment.

Appendices

Appendix A	Certification Statement
Appendix B	Rent Simplification Impact Analysis Data Rent Simplification Impact Analysis Process Rent Simplification Impact Analysis Process Summary
Appendix C	Currents of Change Tracking Matrix
Appendix D	Comprehensive Annual Financial Report