

PHILADELPHIA HOUSING AUTHORITY



MOVING TO WORK ANNUAL PLAN YEAR TEN

**PHA FISCAL YEAR 2011
(APRIL 1, 2010 TO MARCH 31, 2011)**

SUBMITTED APRIL 1, 2010

PHILADELPHIA HOUSING AUTHORITY
MOVING TO WORK ANNUAL PLAN – YEAR TEN

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I. INTRODUCTION AND OVERVIEW

This Annual Plan provides information on activities planned by the Philadelphia Housing Authority (PHA) under the Moving To Work Demonstration Program (MTW) for implementation during MTW Year Ten. It covers PHA's Fiscal Year 2011, i.e. the period from April 1, 2010 to March 31, 2011.

PHA has been an MTW agency since April 2001. Pursuant to the Amended and Restated MTW Agreement (MTW Agreement) executed in October 2008, PHA will continue to be in the MTW Demonstration through 2018. The MTW Agreement describes both the authorities granted to PHA under MTW and the requirements for participation. Subject to HUD approval, PHA proposes to amend the MTW Agreement to allow for use of MTW funds to implement a broader range of activities that fall outside of Sections 8 and 9 of the US Housing Act of 1937. By letter of October 1, 2009, HUD advised that PHA and all other MTW agencies may utilize such broader authority subject to submission of an acceptable proposal to HUD and execution of an amendment to the MTW Agreement.

MTW is a demonstration program authorized by Congress, through which participating agencies are given the flexibility to waive certain statutes and US Department of Housing and Urban Development (HUD) regulations in order to design and test approaches for providing housing assistance that address one or more of the following 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 three objectives listed above are referred to as "MTW statutory objectives". PHA's Annual Plan includes information on both: "MTW Activities", i.e. initiatives which promote one or more statutory objectives and that require use of authority granted to PHA under its MTW Agreement; and, "non-MTW Activities", i.e. all other activities that do not specifically require MTW authority to implement. Organizing the Plan into MTW and non-MTW activities is a HUD requirement; however, it should be noted that the funding flexibility allowed under the MTW Agreement impacts most areas of PHA operations.

Over the nine year MTW period to date, PHA has substantially transformed its properties and programs, utilizing flexibility provided by the MTW Agreement in virtually every area of agency operations. PHA's accomplishments have been documented in a series of MTW Annual Plans and Reports published each year.

In the next year, PHA's investments and program activities will focus on the following major areas. PHA's ability to proceed with these initiatives is dependent on securing adequate operating subsidy, capital and other necessary funding:

- ***Comprehensive rehabilitation and neighborhood revitalization activities:*** PHA will continue to administer the most ambitious capital improvement program in the agency's history including expeditious expenditure of American Revitalization and Recovery Act (ARRA) formula and competitive funds received in 2009. The multiplier effect of these expenditures generates hundreds of jobs and billions of dollars through the local and regional economies. In addition to major capital activities at PHA public housing sites, MTW funding flexibility has allowed PHA to leverage its funding in support of several significant neighborhood development initiatives. Since the year 2000, PHA has built or rehabbed 6,268 units. In the context of a national and regional recession, PHA's construction activities are more critical to the local economy than ever. In the coming year, these activities will expand including intensive efforts to revitalize existing public housing communities, create new energy-efficient housing units and rehabilitate scattered site housing. Currently, there are more than 1000 units in the PHA pipeline planned as new construction, substantial rehab or modernization.
- ***Advanced facilities management:*** PHA is transforming its maintenance and construction operations through application of advanced facilities management tools and techniques such as Building Automation Systems (BAS) and Supervisory Control and Data Acquisition (SCADA) tools. The goal of these initiatives is to improve the quality of PHA's housing facilities and maintenance services including maximizing the useful life of building systems and minimizing energy consumption. PHA employs engineers trained in civil, mechanical, electrical and other relevant disciplines to plan, execute and monitor pro-active preventive maintenance and utility monitoring systems. The advanced facilities management initiative will expand in the coming year to include implementation of new Preventive Maintenance Plans and inspection protocols, and installation of system-wide, sophisticated remote monitoring BAS and SCADA systems linked to a central hub.
- ***Energy Efficiency and Green technologies:*** In planning for construction and maintenance activities, PHA has sharpened the focus on reducing energy usage, minimizing negative environmental and carbon footprint impacts and installing proven Green technologies. In addition to major energy efficiency work scheduled for the coming months, much of which is supported by ARRA funding, PHA has embarked on a partnership with Drexel University to evaluate the efficacy of various energy-efficiency strategies. This project, which will be implemented through 2011, involves creation of energy simulation models for both existing and planned housing developments, along with intensive interactions between University and PHA staff designed to upgrade and continuously improve PHA's energy and Green strategies. PHA believes that this model has potential national implications and benefits. Also as indicated in the Year Nine MTW Plan, PHA intends to further enhance its energy efficiency approach through implementation of an agency-administered Energy Services Company (ESCO).
- ***Partnership Programs Initiative:*** Utilizing authority recently extended to all MTW agencies by the US Department of Housing and Urban Development, PHA proposes to implement an innovative set of new initiatives designed to expand housing options and

service models for special needs and other targeted groups in partnership with universities, state and local government and other stakeholders. This flexible model will allow PHA to leverage PHA and partner resources to provide non-traditional housing options and related health care, educational and/or other necessary services to low-income families and individuals. Potential models include domiciliary care for seniors and people with disabilities, educational/housing options such as a charter for youth including youth aging out of foster care, and others. All initiatives are predicated on securing material support from partner agencies.

- ***Public Safety:*** In response to a surge in crime impacting the City of Philadelphia, PHA has created a newly revised anti-crime plan in partnership with local law enforcement, residents and other community stakeholders. Over the past several years, based on crime statistics and resident survey data, PHA developments have been some of the safest neighborhoods within the City. With the increase in crime in the surrounding neighborhoods, - as most recently evidenced by the random street shooting of a PHA worker – PHA is taking a pro-active approach to keep residents and employees safe and to protect the major investments made in PHA facilities. Among the activities planned for the next year, subject to the availability of financial and other resource support from partner agencies, is a six-site pilot program. Each site will have its own anti-crime team and operations plan including both police officers and a service coordinator. PHA will also support efforts by the Philadelphia Police Department, School District and other stakeholders to create positive, goal oriented alternatives for youth including, but not limited to, exploring establishment of a Law Enforcement Academy within the public school system.

- ***Support for resident economic self-sufficiency and senior independent living:*** PHA offers an exceptional range of self-sufficiency services focused on helping residents to prepare for the workforce and to obtain jobs and living wage incomes. PHA collaborates with the statewide “welfare to work” system and partners with numerous job training and educational institutions to help train and place residents in sustainable jobs. Tough economic conditions and high unemployment rates highlight the need to continue successful initiatives such as PHA’s Community Partner and Pre-Apprenticeship Construction Training programs. PHA’s services strategy also encompasses efforts to maximize independent living for seniors and people with disabilities such as the Nursing Home Transition program. In tandem with PHA’s aggressive building program, these efforts are helping to increase housing supply and dramatically improve the quality of life for older and disabled residents. Over the coming year, PHA’s efforts to expand service enriched housing and maximize the potential for independent living will be accelerated including creation of new health service and adult day care options.

- ***Continuous management and administrative improvement efforts:*** PHA has invested in numerous programs to increase administrative efficiency and streamline operations. As a key component of the MTW strategy, PHA has implemented technology projects designed to simplify work processing and improve service for residents, applicants and the general public. Successfully completed projects such as the Interactive Voice Response system, quality control monitoring, service order processing, performance

management, website enhancements and many others reflect the soundness and efficacy of PHA's integrated technology strategy. Most recently, PHA has implemented new waiting list and recertification processing systems, and will soon implement on-line application processing. As evidence of the strength of PHA's financial and administrative operations, PHA received unqualified opinions or clean audits on all PHA's audited financial statements from 2003 through 2008.

- **Quality Control:** A focus on quality control has been embedded into PHA operations. PHA has implemented a wide-ranging program of quality control activities designed to ensure high quality service and uniform transaction processing. Quality control reviews are now systematically being implemented throughout the HCV and Public Housing programs. Service order quality control support includes pre and post- inspection of work by trained engineering staff.

Moving forward, PHA intends to build on the foundation of substantial accomplishments achieved over the past nine years, while expanding into new directions. PHA anticipates that it will periodically review and revise ongoing initiatives (both MTW and non-MTW activities) as needed in response to current conditions and priorities and to new opportunities.

Background on the MTW Annual Plan

This is the Tenth Annual Plan submitted by PHA under the MTW Demonstration Program. HUD defines the content of the MTW Annual Plan. In addition to submission of an Annual Plan, PHA is required to submit to HUD an MTW Annual Report summarizing the accomplishments for each MTW program year. The October 2008 MTW Agreement establishes revised standards for both documents.

This MTW Year Ten Annual Plan summarizes PHA's major plans and initiatives for fiscal year 2011, which begins on April 1, 2010. All activities have been incorporated into PHA's comprehensive, agency-wide Strategic Operating Plan (SOP), which provides a detailed blueprint for the Authority's goals, objectives and tasks. Progress and outcomes of tasks and objectives are tracked and updated on a routine basis. A high level summary of the SOP is also included in the Annual Plan.

As part of each year's MTW planning effort, PHA provides opportunities for the residents and the broader community to review the proposed goals and objectives and offer feedback, consistent with the requirements of the MTW Agreement. A public comment period was established through public notices. PHA conducted pre-meetings with resident leaders, and conducted a public hearing on December 17, 2009. The draft Annual Plan was subsequently modified to reflect resident and public comments.

II. GENERAL OPERATING INFORMATION

A. Housing Stock Information

Public Housing/HCV Inventory

PHA's public housing inventory includes units for families, seniors and people with disabilities located at conventional and scattered site properties including properties managed by Alternate Management Entities (AME) and the Philadelphia Asset and Property Management Corporation (PAPMC). Table 1 provides information on the PHA's public housing inventory. Units available for occupancy are projected to change during the next year as a result of PHA construction and modernization activities described below.

Table 1 – Public Housing Inventory

	Actual as of November 2009	Projected as of March 2011
MTW Public Housing Units*	15,267	14,593
Public Housing Units Available for Occupancy**	14,212	14,593

*PHA does not have any Non-MTW Public Housing units.

**Available for Occupancy units exclude units that are vacant and not available for occupancy including units: undergoing modernization as defined in 24 CFR 990.145; approved for disposition or demolition; approved for non-dwelling uses; vacant due to litigation as defined in 24 CFR 990.145; damaged and vacant due to casualty losses; and, vacant due to circumstances beyond the PHA's control as defined in 24 CFR 901.5.

PHA operates a Housing Choice Voucher program including both MTW and Non-MTW vouchers. Table 2 below provides information on the current and projected number of authorized MTW and Non-MTW Housing Choice Vouchers.

Table 2 – Housing Choice Voucher (HCV) Inventory

	Actual Authorized as of November 2009	Projected Authorized as of March 2011
MTW Tenant Based HCV Vouchers	14,850	14,850
MTW Activity Vouchers	2,844	2,844
MTW Authorized Subtotal	17,694	17,694
Non-MTW HCV Vouchers*	765	987
Section 8 Mod Rehab/SRO	711	711
Non-MTW Authorized Subtotal	1,476	1,698
TOTAL AUTHORIZED	19,170	19,392

Non-MTW Vouchers as of November 2009 include: Family Unification Program, VASH, Designated Housing, Tenant Protection and, Mainstream. Note that the MTW Agreement authorizes PHA under defined circumstances to transfer vouchers from the Non-MTW category into the MTW Block Grant.

Planned Additions to Public Housing Inventory

During the MTW Plan year, PHA plans to add 313 units to the inventory of Public Housing units that are available for occupancy using existing ACC authority. PHA also plans to convert 53 units and modernize 11 units. Actual numbers may change based on construction and reoccupancy schedules. Following are brief descriptions of projected additions:

- **Mantua Redevelopment:** New construction of 101 walkup-type affordable rental units and non-dwelling spaces. Unit amenities will include off street parking, washers and dryers, and modern kitchens with electric stove and garbage disposal. Twenty-eight units will be handicap-accessible.
- **CBMO 902 – CBMO 910:** New construction of 100 efficiency walkup-type affordable rental units. Each unit will include a private bathroom, basic kitchen with range, refrigerator, and sink.
- **Markoe Street Development:** New construction and rehabilitation of 12 row house-type affordable rental units. Unit amenities include modern kitchens with stoves and refrigerators. The units will have central air conditioning, ceiling fans, and washer/dryer hook-ups. One unit will be handicap-accessible. (Note that this project also involves modernization of an additional 11 units as shown on Table 3.)
- **Paschall Redevelopment:** New construction of 100 walkup-type affordable rental units. Unit amenities will include off-street parking, central air conditioning, washers and dryers, and modern kitchens with electric stove and garbage disposal. Twenty units will be handicap-accessible. The plan is to complete construction in late fiscal year 2011 or early fiscal year 2012.
- **Plymouth Hall:** Substantial rehabilitation/conversion of existing 72 efficiencies and one-bedroom units vacant due to fire damage into 53 new efficiency, and one-bedroom rental apartment units. Fifteen units will be accessible.

Table 3 summarizes the planned unit additions and changes by development including bedroom size, type and accessible features if applicable. Configurations may change during the development planning process. PHA utilizes MTW flexibility in the development process as more fully described in Chapter VI.

Table 3 – Planned Changes/Additions to Public Housing Inventory

New Construction							
AMP #	Development	Bedroom Sizes				Total Units	Units with Accessible features
		Efficiency	One-bedroom	Two-bedroom	Three-bedroom		
045	Mantua Redevelopment	0	25	45	31	101	28
902	CBMO 902	8				8	8
903	CBMO 903	8	-	-	-	8	8
904	CBMO 904	4	-	-	-	4	4
905	CBMO 905	16	-	-	-	16	16
906	CBMO 906	16	-	-	-	16	16
907	CBMO 907	20	-	-	-	20	20
908	CBMO 908	4	-	-	-	4	4
909	CBMO 909	12	-	-	-	12	12
910	CBMO 910	12	-	-	-	12	12
902	Markoe Street Development	0	8	3	1	12	1
	Paschall Redevelopment	0	12	52	36	100	20
Total New Construction		100	45	100	68	313	149
Substantial Rehab/Conversion							
079	Plymouth Hall	47	6	0	0	53	15
Total Substantial Rehab		47	6	0	0	53	15
Modernization							
902	Markoe Street Development	0	8	3	0	11	1
Total Modernization		0	8	3	0	11	1

Planned Demolition/Disposition Activity

PHA’s inventory is also projected to change during the MTW Plan year as a result of planned demolitions and/or disposition of up to 2,052 units. The actual number may vary. Actual timing may also vary depending on the HUD approval cycle and the timing of development activities. Table 4 provides a summary of planned demo/dispo activity by development.

Table 4 – Planned Public Housing Unit Demolition/Disposition Activity

AMP #	Development	Units to be Disposed/ Demolished	Justification	Status
014	Norris Apartments	122	Demolition of ten story high-rise apartment building with 157 rental units and two story low-rise buildings with 22 rental units, and new construction of 57 two & three story townhouse rental units, with disposition to limited partnerships under long term ground leases pursuant to mixed finance transactions	Tax Credit Application being submitted to PHFA in early 2010. Demolition/Disposition application to be submitted.
079	Plymouth Hall	19	Conversion of existing 72 efficiencies and one-bedroom units vacant due to fire damage into 53 new efficiency, one and two bedroom rental apartment units.	CM procured and design in process.
061	Paschall Apartments	223	Demolition of 223 rental units, and new construction of 100 units in two phases, with disposition to limited partnerships under long term ground leases pursuant to mixed finance transactions	HUD/SAC approved for demolition and disposition. Tax Credits awarded
023	Liddonfield Homes	463	Demolition of 463 rental units, pursuant to a HUD approved demolition of 51 units and mandatory conversion 412 units	Demolition and mandatory conversion approval received,
024	Queen Lane Apartment	138	Demolition of high-rise apartment building in 2011 to develop new 50 two & three story townhouse rental units, with disposition to limited partnerships under long term ground leases pursuant to mixed finance transactions	Tax Credit Application being submitted to PHFA in late 2010. Demolition/Disposition application to be submitted.
901	Scattered Sites	34	Potential 34 vacant units to be sold pursuant to PHA 1780 vacant scattered sites disposition initiative to create a more sustainable occupied scattered site portfolio, and to stabilize communities by reducing the number of PHA-owned vacant structures that are considered beyond PHA potential for repair	Disposition approval received,
902	Scattered Sites	81	Potential up to 81 vacant units to be sold pursuant to PHA 1780 vacant scattered sites disposition initiative. See above description	Disposition approval received,
903	Scattered Sites	35	Potential up to 35 vacant units to be sold pursuant to PHA 1780 vacant scattered sites disposition initiative. See above description.	Disposition approval received,
904	Scattered Sites	86	Potential up to 86 vacant units to be sold pursuant to PHA 1780 vacant scattered sites disposition initiative. See above description.	Disposition approval received,
905	Scattered Sites	89	Potential up to 89 units to be sold pursuant to PHA 1780 vacant scattered sites disposition initiative. See above description.	Disposition approval received,
906	Scattered Sites	94	Potential up to 94 units to be sold pursuant to PHA 1780 vacant scattered sites disposition initiative. See above description.	Disposition approval received,
907	Scattered Sites	95	Potential up to 95 units to be sold pursuant to PHA 1780 vacant scattered sites disposition initiative. See above description.	Disposition approval received,
908	Scattered Sites	181	Potential up to 181 units to be sold pursuant to PHA 1780 vacant scattered sites disposition initiative. See above	Disposition approval received,

AMP #	Development	Units to be Disposed/ Demolished	Justification	Status
			description.	
909	Scattered Sites	211	Potential up to 211 units to be sold pursuant to PHA 1780 vacant scattered sites disposition initiative. See above description.	Disposition approval received,
910	Scattered Sites	181	Potential up to 181 units to be sold pursuant to PHA 1780 vacant scattered sites disposition initiative. See above description.	Disposition approval received,
Total Units		2,052		

Planned Significant Capital Expenditures

PHA’s capital planning and development strategies are designed to support, rehabilitate and modernize existing PHA sites and to revitalize neighborhoods throughout the City. PHA works to leverage its limited PHA resources with other resources such as Low Income Housing Tax Credits, private equity, and state and local funding sources. Utilization of MTW flexibility has been a critical element in PHA’s modernization and development efforts. As documented in prior MTW Annual Plans and Reports, PHA has been enormously successful in these efforts. Since 2000, 6,268 units have been rehabilitated or newly constructed. An additional 1,024 units are currently being developed or rehabilitated. Cumulatively this represents approximately \$1.6 billion in public and private investments.

PHA maintains updated physical needs assessments including estimated costs for all PHA sites. Capital needs continue to dramatically exceed available funding. The PHA Capital Investment Strategy summarized on Table 5 provides a 20-year projection of planned investments by site. See also Appendix C- Asset Management Table for additional information on PHA potential and projected development and modernization activities by site and neighborhood. As these documents reflect a long-term perspective, they are subject to periodic change to reflect current priorities, conditions and opportunities.

Table 5 – Capital Investment Strategy

Property	Estimated PHA Funding Need	Proposed Time Schedule
Abbottsford	\$ 24,000,000	2006-2012
Administrative building	\$ 20,000,000	2010-2012
Arch Homes	\$ 5,000,000	2020
Arlene Homes	\$ 1,159,000	2008, 2014
Bartram Village	\$ 5,100,000	2008, 2013
Bentley Hall	\$ 3,402,000	2013
Blumberg Apts	\$ 30,000,000	2006-2016
Brewerytown	\$ 7,700,000	2008-2009
Cecil B. Moore	\$ 837,000	2014
Champlost	\$ 2,000,000	2016
Collegeview	\$ 1,636,000	2008, 2012
Emlen Arms	\$ 2,500,000	2009-2014
Fairhill Apts.	\$ 17,000,000	2006, 2009-2014

Property	Estimated PHA Funding Need	Proposed Time Schedule
Germantown House ¹	\$ 15,000,000	2006-2012
Gladys B Jacobs	\$ 3,500,000	2016-2020
Haddington Homes	\$ 23,000,000	2019-2021
Harrison Plaza	\$ 24,000,000	2004-20012
Haverford Homes	\$ 718,000	2012
Hill Creek	\$ 25,000,000	2009-2015
Holmecrest Homes	\$ 5,200,000	2013
Johnson Homes	\$ 79,000,000	2006-2011
Katie B. Jackson	\$ 5,060,000	2009-2021
Liddonfield	\$ 84,000,000	2005-2012
Lucien E. Blackwell Homes ¹ (formerly Mill Ck)	\$ 15,500,000	2002-2006
Ludlow HOPE VI	\$ 8,000,000	2006-2010
Mantua Hall	\$ 28,000,000	2006, 2009
Martin Luther King ¹	\$ 1,500,000	2006
Millcreek Extension	\$ 36,000,000	2007-2010
Morton Homes	\$ 23,000,000	2009-2011, 2012
Mount Olivet	\$ 1,500,000	2011-2012
Neumann North (67 ACC units) ¹	\$ 2,000,000	2005-2006
Norris (high/low rises)	\$ 35,000,000	2009-2021
Oxford Village	\$ 13,000,000	2006, 2016-2017
Paschall Apts.	\$ 30,000,000	2009-2012
PHA Wide – Building Infrastructure upgrade	\$ 75,000,000	2009-2014
PHA Wide Community Building	\$ 30,000,000	2010-2016
PHA Administrative Building	\$ 20,000,000	2009-2012
Plymouth Hall	\$ 15,000,000	2009-2012
Point Breeze	\$ 1,445,000	2009-2012
Queen Lane	\$ 16,000,000	2006, 2009- 2012
Raymond Rosen	\$ 11,000,000	2016-2020
RDA acquisitions and rehab	\$ 18,000,000	2003-20012
Scattered Site Renovation	\$ 230,000,000	2002-2021
Scattered Site Development	\$ 150,000,000	2002-2021
Scattered Site Modular Housing	\$ 60,000,000	2006-2021
Spring Garden Apts.	\$ 14,500,000	2009-2012
St. Ignatius ¹	\$ 1,000,000	2003-2007
Warnock ¹	\$ 29,100,000	2007-2010
West Park Apts.	\$ 39,800,000	2009-2017
Westpark Plaza	\$ 12,000,000	2009-2016
Whitehall Apartments	\$ 8,250,000	2020-2021
Wilson Park	\$ 13,000,000	2009-2012
Debt Service Repayments ²	\$ 310,000,000	2002-2022
TOTAL	\$ 1,632,407,000	

¹ Capital Funding needs for HOPE VI and Mixed-Finance Developments. See table in Appendix E for more details.

² Bond Funded Developments: Tasker, Blumberg, Wilson III and Westpark (Exterior/Unit Improvements)

As part of the MTW Block Grant, PHA receives funding through the Capital Fund Program (CFP) on a fiscal year basis. Included as Appendix A to the MTW Annual Plan are the required HUD forms reflecting planned uses of Federal Fiscal Year 2010 (which equates for CFP purposes to PHA's FY 2011) CFP and Replacement Housing Fund grants:

- Capital Fund Program Annual Statement Parts I and II for Grant PA26P00250110
- Capital Fund Program Annual Statement Parts I and II for Grant PA26R00250110
- Capital Fund Program Annual Statement Parts I and II for Grant PA26R00250210

The Capital Fund Annual Statement is a product of input from all PHA departments and the PHA Resident Advisory Board. It enables PHA to address its highest priority physical and management needs. The following is a summary of the major work item categories and specific work activities contained in the FFY 2010 Capital Fund Program:

Management Improvements. The Capital Fund Program devotes approximately 10 percent of its funding allocation to address activities that qualify as management improvements. Resident and site security are major activities funded in this section. PHA will provide more than \$3.3 million for police patrol and the resident-staffed lobby monitor program. Computer software acquisition, installation and program implementation activities are also a major component of the Management Improvement line items. Over the past five years, PHA has been implementing and upgrading PeopleSoft computer systems. The Capital Fund program will obligate \$1 million toward the upgrade of the PeopleSoft financial system.

Additionally, the Capital Fund Program will provide approximately \$1,000,000 for the “on-the-job” training portion of the successful PHA Pre-Apprenticeship Job Training program. The Moving To Work program provides the classroom training funds.

Administrative Costs. PHA adheres to the 10 percent program cap to fund its administrative responsibilities for the Capital Fund Program.

Fees and Costs: Master Planning activities, in the amount of \$100,000, associated with the design of dwelling units, site improvement, and non-dwelling type improvements will be funded from this development account. Environmental testing for lead-based paint and other environmental testing is budgeted at \$500,000 and \$2 million is budgeted for A&E services as well as consulting, legal, and professional services.

Site Acquisition. A budget of \$100,000 has been established to assist in the acquisition phase of future PHA acquisition and development activities.

Site Improvements. The Capital Fund Program commits \$3.4 million for site improvement activities at both scattered sites and conventional sites. An estimated \$1.6 million is committed to comprehensive site improvements at 137 scattered site units. The plan also provides \$1.4 million for PHA’s efforts to perform substantial site improvements at a variety of scattered site and conventional properties through a PHA-wide approach. Additional site improvements in the amount of \$425,000 is budgeted for signage, fencing, lighting, and landscaping as part of the PHA “Sparkle” program.

Scattered Site Renovations: Assuming adequate federal funding, PHA will undertake the comprehensive rehabilitation of an estimated 106 units.

Conventional Site Renovations: The plan also provides \$2 million for PHA-wide dwelling unit improvements. These work items are typically project/site specific and involve major system/component replacement activities.

Non-Dwelling Structures and Equipment: Funds in the amount of \$2,500,000 are programmed for upgrades of common areas or non-dwelling space PHA-wide. Funding is also provided for security equipment PHA-wide at \$200,000. Computer hardware and related equipment and telephone infrastructure are budgeted at \$800,000. Maintenance equipment purchases are budgeted at \$100,000; administrative and field office equipment and furniture at \$75,000, and community space equipment and furniture at \$30,000.

Demolition. Demolition funds budgeted at \$300,000 is used to remove houses that pose life safety issues.

Relocation. Funding in the amount of \$200,000 is available to assist families who must relocate as a result of modernization activities.

New Development. Funding in the amount of \$500,000 is budgeted for new development activities.

Bond Debt Service: Debt service in the amount of \$11,899,425 for the bonds issued to support the Tasker revitalization project.

Excluding ARRA, 90% of Capital Fund Program monies must be contractually obligated within 24 months of the date that funds are made available. One hundred percent of the grant must be expended within 48 months of the date funds are made available. PHA has a demonstrated record of achieving, and often exceeding, compliance standards for this and other programs.

In addition to plans for timely expenditure of Capital Fund Program grants received during MTW Year Ten, PHA has an ongoing pipeline of projects. PHA’s capital activities for Year Ten also include HOPE VI, Mixed Finance and prior year CFP projects that are implemented over multiple fiscal years. Table 6 provides a summary of development programs that are currently underway or will commence in MTW Year Ten. The Capital Fund, Replacement Housing Fund and/or other sources such as HOPE VI, program income, bonds and other mixed-financing programs fund these development activities.

Table 6 – MTW Year Ten Capital Programs

Development Name	Scope of Work	Construction Costs	Completion Date
PHA-Wide	Security Upgrades	\$5,000,000	Apr-11
PHA-Wide-Scattered Site Replacement units	New Development	\$28,480,000	Apr-11
PHA-Wide-Scattered Sites Vacancy Reduction	Vacancy reduction	\$30,000,000	Apr-12
PHA-Wide-MEP Upgrade/Enhancement	Bldg Infrastructure systems Upgrade/Enhancement	\$21,000,000	Mar-12
PHA-Wide-Sprinkler Upgrade	High-rise Sprinkler standpipes	\$7,000,000	Mar-11

Development Name	Scope of Work	Construction Costs	Completion Date
	Improvements		
Plymouth Hall Major Rehab	Renovation and reconfiguration of existing bldg	\$14,625,000	Mar-11
Third Party Capital Requests	New Development	\$500,000	Dec-10
Millcreek Extension ¹	New Development	\$8,000,000	Dec-11
Warnock ¹	New Development	\$29,100,000	Dec-10
Mantua ¹	New Development	\$26,700,000	Dec-11
Paschall ¹	New Development	\$27,000,000	Dec-12
PHA-Wide	Accessibility Improvements	\$500,000	Ongoing
PHA-Wide	Energy Conservation	\$500,000	Ongoing
PHA-Wide	Sparkle Plus	\$2,300,000	Ongoing
PHA-Wide	Energy Conservation	\$3,000,000	Ongoing
PHA-Wide-Scattered Sites	Accessibility Improvements	\$5,000,000	Sep-10
Belmont-Mantua Scattered Site ¹	New Development	\$1,700,000	Mar-13
Blumberg	Upgrades to Non-dwelling Spaces	\$6,000,000	Jun-10
Administrative Building ²	Demolition and New development	\$20,000,000	Jun-12
Wilson Park	Accessibility Improvements	\$5,000,000	May-12
Harrison Plaza	Accessibility Improvements	\$1,306,250	May-12
Fairhill	Accessibility Improvements	\$2,873,750	May-12
Johnson Homes	Accessibility Improvements	\$3,111,250	May-12
Wilson Park	Upgrades to Non-dwelling Spaces	\$3,000,000	Dec-10
Norris Apartment	New Development	\$13,000,000	Dec-12
Community Center		\$6,000,000	Dec-12
Queen Lane		\$15,000,000	Dec-12
Liddonfield		\$5,000,000	Dec-10
TOTAL		\$290,696,250	

¹ Capital Funding needs for HOPE VI and Mixed-Finance Developments.

² Funding provided from non-federal sources.

PHA has been aggressive and successful in using the HUD HOPE VI and Mixed-Finance Programs to redevelop PHA's aging and severely distressed housing units. To date, PHA has received five (5) HOPE VI grants. PHA applied for HOPE VI funding for the Belmont Mantua scattered site area during MTW Year Nine.

PHA plans to apply for HOPE VI, ChoiceNeighborhood and or other revitalization grants, 9% tax credits and/or Tax Exempt Volume Cap Bonds that are accompanied with 4% tax credits for at least one additional conventional development (Norris, Queen Lane) and one or more Scattered Sites Area (CBMO 901 thru 910). PHA will continue to need capital funds to aggressively leverage other sources of funding as described above.

PHA has either completed or has under development a number of replacement housing sites including: St. Anthony's Senior Residence, Eight Diamonds, 117 Scattered Site units, Suffolk Manor, Mt. Olivet, Ludlow, Marshall Shepherd Village, Falls Ridge, Martin Luther King Plaza Phase I, III and IV, Neumann North, Germantown House, Lucien E. Blackwell (LEB) I, II and III, St. Ignatius I and II, Spring Garden I and II, Nelly Reynolds Garden and Warnock Phases I

and II. These sites have received significant investment of PHA capital or replacement housing funds, with the exception of St. Anthony’s Senior Residence, which received an investment of ACC subsidy only. Currently under construction in 2010 are Mantua and Paschall Developments. Projects in the planning stage include Norris, Queen Lane and scattered sites replacement units.

PHA is also planning the development of a community center and redevelopment of an existing obsolete and underutilized, PHA-owned administrative building in Center City. The project will entail the demolition of the existing building and construction of a new 5-story building with green roof to house PHA administrative offices. It will be accessible to residents with disabilities and cost effective for PHA to operate. First floor retail space will be made available to enhance the Center City commercial corridor.

Description of Project-Based Units:

PHA currently has 1,657 HCV vouchers under project-based contracts including projects selected under the MTW Unit Based Voucher program. As shown in Table 7, a total of 1,689 vouchers are projected to be project based by the end of MTW Year Ten. Actual number of units under contract may vary based on additional project selections made over the course of the year.

Table 7 – Project Based Voucher Units

Project Name/Sponsor	Contract Type	Description	Units Under Contract 11/2009	Projected Units Under Contract 3/31/2011
Help Philadelphia II Assoc.	PBA	Homeless	50	50
Justin Associates/ Locust Towers	PBA	Family/very low income	40	40
South 55th Street	PBA	Family/very low income	18	18
Chatham Apts Assoc, LP	PBA	family/very low income	20	20
NPCH - N. 11th St	PBA	family/very low income	16	16
LIH	PBA	family/very low income	31	31
Diamond St/Mansion Court	PBA	family/very low income	16	16
Sartain Apartment	PBA	senior/very low income	35	35
Tioga Gardens	PBA	family/very low income	18	18
Inglis House	PBA	accessible/very low income	17	17
Boriquen Asso II/Jardines	PBA	family/very low income	22	22
Travelers Aid Society	PBA	Homeless	22	22
1260 Housing	PBA	family/very low income	53	53
Art Apartments	PBA	family/very low income	30	30
Dignity Housing	PBA	shelter/very low income	71	71
Edgewood Manor	PBA	family/very low income	33	33
Hamil Mills	PBA	senior/very low income	40	40
1260/4th St Access	PBA	family/very low income	24	24
Susquehanna II	PBA	family/very low income	47	47
Brentwood Parkside Assoc.	PBA	family/very low income	22	22
Dunlap Apartment	PBA	family/very low income	35	35
Imani Homes	PBA	accessible/very low income	24	24

Project Name/Sponsor	Contract Type	Description	Units Under Contract 11/2009	Projected Units Under Contract 3/31/2011
PEC Imani III	PBA	family/very low income	6	6
Lehigh Park Apts. II	PBA	family/very low income	25	25
National Temple/1260 Housing - 1500 Gratz St	PBA	family/very low income	98	98
National Temple/1260 Housing - 1700N. 16 St	PBA	family/very low income	62	62
Bethesda Bainbridge	PBA	men/very low income	20	20
Bethesda Project- South	PBA	men/very low income	5	5
HELP USA	PBA	Veterans	0	14
Regent Terrace	Unit Base	family/very low income	80	80
WCRP/TNI LTD	Unit Base	family/very low income	44	44
WCRP/Targeted Neighborhood	Unit Base	family/very low income	16	16
WCRP/Villanueva/Franklin St	Unit Base	family/very low income	14	14
Diamond St. Apt	Unit Base	family/very low income	16	16
WCRP/Orianna St	Unit Base	family/very low income	9	9
Diamond Phase III	Unit Base	family/very low income	21	21
West Diamond II	Unit Base	family/very low income	6	6
WCRP/Somerset	Unit Base	family/very low income	15	15
WCRP/4th & Diamond St	Unit Base	family/very low income	32	32
WCRP/INB LTD	Unit Base	family/very low income	12	12
1260/Monument News/Edgely Rd	Unit Base	family; D & A/very low income	60	60
1260/Parkside Assoc.	Unit Base	family/very low income	43	43
1260/Walnut Thompson	Unit Base	family/very low income	35	35
Belmont Garden, LP	Unit Base	family/very low income	3	3
Bethesda Spruce St	Unit Base	family/very low income	13	13
Walnut Park	Unit Base	senior/very low income	224	224
PEC	Unit Base	family/very low income	27	27
Eastwick	Unit Base	accessible/very low income	40	40
Freedom Village	Unit Base	homeless/very low income	16	16
Imani V	Unit Base	family/very low income	11	11
Imani II	Unit Base	family/very low income	6	6
Imani IV	Unit Base	family/very low income	8	8
Bernice Elsa	Unit Base	family/very low income	6	6
Jannie's Place	Unit Base	homeless/very low income	N/A	6
Chaka Fattah I	Unit Base	homeless/very low income	N/A	6
Chaka Fattah II	Unit Base	homeless/very low income	N/A	6
TOTAL			1,657	1,689

B. Leasing Information - Projected

Table 8 provides a summary of projected leasing activity for Public Housing and HCV the year ending March 31, 2011. These are estimates that are subject to change over the course of the MTW Plan year.

Table 8 – Projected Leased/In Use for MTW Year Ten

	Projected Available as of March 2011	Projected Leased/In Use as of March 2011
MTW Public Housing Units	14,593	14,593
MTW Tenant Based HCV Vouchers	14,850	14,850
MTW Activity Vouchers	2,844	2,844
Non-MTW HCV Vouchers*	987	987
Section 8 Mod Rehab/SRO	711	711
TOTAL	33,985	33,985

Actual leasing figures for public housing will be impacted by development and relocation timetables. Note that all public housing units are MTW units.

C. Waiting List Information

PHA will continue to implement its waiting lists in accordance with the HCV Administrative Plan and Admissions and Continued Occupancy Policy as applicable. PAPMC and AME sites are subject to site-specific waiting list policies. The following is a summary of anticipated changes/activities related to waiting lists for MTW Year Ten:

- There are approximately 32,000 people currently on PHA’s waiting list. PHA anticipates that this number may increase by approximately 10% in Year 10. PHA intends to conduct an update of the public housing waiting list in the near future to allow applicants to make site-based selections.
- As specified in the ACOP, PHA may elect to close individual public housing site-based waiting lists when the number of applicants on the waiting list exceeds projected vacancies.
- As new mixed finance developments are preparing to open, PHA will advertise and open site-based waiting lists pursuant to the development’s regulatory and operating agreements.
- As a result of the re-opening of the HCV waiting list that occurred in the last quarter of MTW Year Nine, PHA anticipates that approximately 45,000 applicants will be added to the HCV waiting list. This is an estimate. PHA will report actual numbers in the MTW Annual Report.

III. NON-MTW RELATED INFORMATION

A. Planned Sources and Uses of other HUD or Federal Funds

Sources and uses information is included in Chapter VII.

B. Description of Non-MTW Activities

Over nine years as a participant in the MTW Demonstration, PHA has incorporated MTW flexibility into virtually all areas of its operations. However, as part of HUD's new reporting requirements established in the MTW Agreement and the related HUD Form 50900, PHA is required to separately organize and describe its "MTW activities" and "non-MTW activities". "MTW activities" include those initiatives that promote one or more statutory objectives and that require use of authority granted to PHA under its MTW Agreement. MTW activities are discussed in Chapters V and VI.

PHA's numerous non-MTW activities are briefly highlighted below. While these initiatives do not directly require MTW authority to implement, most have a direct, supportive relationship to other MTW activities. For example, PHA communication activities are directed to all residents and are often used to provide essential information on MTW programs and initiatives; PHA technology initiatives enable the processing, tracking and monitoring of MTW activities; etc.

- **Admissions and Continued Occupancy Policy** – PHA has revised its Public Housing Admissions and Continued Occupancy Policy (ACOP). A summary of changes from the previous version is included in Appendix D. Note that the ACOP incorporates both MTW and Non-MTW components. MTW components are discussed as appropriate in Chapters V and VI.
- **Housing Choice Voucher Program Administrative Plan** – PHA has revised its HCV Program Administrative Plan. A summary of changes from the previous version is included in Appendix E. As with the ACOP, the Administrative Plan incorporates both MTW and Non-MTW components. MTW components are discussed as appropriate in Chapters V and VI of this document.

Highlighted below are other non-MTW activities planned for MTW Year Ten, organized by PHA Strategic Plan objective:

Strategic Operating Plan Goal 1: Achieve Excellence in Property Management

Activities under this goal area will include:

- PHA will continue to make improvements to core management and maintenance systems including full adoption of advanced facilities management tools and techniques including

BAS and SCADA systems. These system enhancements will help to support local asset management, increase rent collections, improve property maintenance, and reduce vacancy turnaround time.

- PHA will continue the Maintenance Wave and Sparkle Plus programs.
- PHA will continue the Clean Sweep Program, which fulfills the resident Community Service requirement through resident participation in site and neighborhood cleanup activities, subject to funding availability.
- PHA will perform UPCS inspections on 100% of public housing units.
- PHA will continue implementation of its Integrated Pest Management pilot program at conventional sites.
- PHA will communicate regularly with residents including publishing the PHA Experience newsletter.
- PHA will transfer the waitlist data for all programs (PH, HCV, HO and PAPMC) into PeopleSoft's CRM under one universal pre-application per client for all programs. PHA will continue to maintain separate waiting lists for each program. Among other benefits, this initiative will facilitate PHA's ability to track and place clients who need accessible housing units.
- PHA will continue its enhanced unit rehabilitation efforts that allow PHA with the Home Selection Day process to reoccupy vacant housing units in a more efficient manner, utilizing the Vacancy Reduction Control Book.
- PHA will continue its lease enforcement efforts to improve the quality and safety of PHA communities and Philadelphia's neighborhoods. Activities to date have included implementation of the PeopleSoft CRM module and the creation of "quality of life" software applications such as complaint, investigation, incident and risk tracking.
- PHA will extend its training and asset management initiatives including activities to ensure full LIHTC program compliance at Alternately Managed Entity (AME) sites.
- PHA will continue to utilize an internal File Audit Procedure that automatically assigns Asset Managers 10% of their files each month for review using audit guidelines and the Quality Control Module. Errors are documented and remedies recorded to reduce the occurrence of "findings."
- PHA will continue to audit 100% of service order requests within 30 days from the date the service order is closed.
- PHA will undertake the efficient reoccupancy of new units brought on line as a result of PHA's extensive revitalization efforts.

- PHA will continue development of a site-based waiting list system for use in all public housing developments, including scattered sites. Note that LIHTC sites already utilize site-based waiting lists.

Strategic Operating Plan Goal 2: Achieve Excellence in the Management of the Housing Choice Voucher Program and Enforce Compliance

Activities under this goal area will include:

- PHA will continue its quality control initiatives including 100% review of all files.
- PHA will continue to conduct Housing Fairs and other efforts to improve the quality and expand the geographic distribution of housing units available to HCV participants.
- Improved applicant screening and enforcement of program regulations, including enhancements to PHA’s investigative and complaint tracking software.
- PHA will continue to require Tenant Integrity Program training for all program participants.
- PHA will update its HCV site manuals and provide staff with training on new and revised procedures.
- PHA will continue to sponsor landlord training and outreach programs.
- PHA will continue to require direct deposit for Housing Choice Voucher payments.
- PHA will continue to operate a network of Community-Based Housing Choice Voucher offices at five locations throughout the city.

Strategic Operating Plan Goal 3: Develop Affordable, Quality Housing that Supports Balanced Communities

- PHA will continue implementation of an asset repositioning strategy for the scattered site units in order to generate revenue and reduce operating expenses. This strategy will involve some or all of the following elements: sale of vacant lots and buildings at market value; realignment of a portion of ACC units using revised admissions and occupancy guidelines; relocation as needed of existing households; and, identifying alternative funding mechanisms and/or ownership structure for a portion of the ACC unit portfolio.
- See detailed discussion of capital planning and development initiatives in Chapter II.

Strategic Operating Plan Goal 4: Implement Public Safety Programs that Promote the Well-Being of Our Neighborhoods and the Accountability of Program Participants

- The PHA Investigations Unit will continue to provide assistance to all internal and external agencies, federal, state and local as requested. The unit conducts Workers' Compensation investigations to ensure the integrity of claims made. The unit will process Police Record Checks for conventional and scattered sites and continue to assist HCVP in processing Investigations to deter illegal occupancy.
- The Lease Enforcement Compliance Unit will continue to support the Asset Managers in obtaining compliance with rent payment and all other lease provisions.
- PHA will implement a series of new public safety initiatives at pilot sites subject to funding availability.
- PHA will continue to expedite the process of criminal record checks on all applicants and household members. PHA will also conduct criminal records checks at recertification.
- PHA will continue to implement internal COMSTAT crime statistics meetings, similar to those used by the City of Philadelphia Police Department, to facilitate continuous review and response to public safety issues.
- PHA will continue to implement Quality of Life programs with clearly defined guidelines and sanctions that incorporate PHA lease violations and local ordinances.
- PHA will continue to implement the D.A.R.E. and G.R.E.A.T. programs to incorporate health and public safety concerns into youth programs.
- PHA will continue to provide support for resident-police partnerships through the Police Advisory Board, Town Watch programs, and participation with the Citizens Crime Commission of Delaware Valley.

Strategic Operating Plan Goal 5: Engage Other Institutions to Leverage Resources and Assist in Promoting Economic Enhancement and Support Services for PHA Residents

- PHA will continue to identify and secure additional supportive service program funds to enhance resident-oriented programs. This task area is even more critical in light of the reductions in PHA federal operating subsidy funding.
- PHA intends to collaborate with other stakeholders to develop and implement a public Charter School in the City of Philadelphia. This charter school would operate as a standard school within the School District of Philadelphia structure, with an emphasis on Vo-Tech, primarily the preparation of students for entering the building trades, or establishment of self-employment opportunities using the associated skills. PHA is also exploring establishment of a Law Enforcement Academy in partnership with the Philadelphia Police Department, School District and others as described below.

- PHA plans to expand its youth programs through a series of new/enhanced initiatives. These initiatives include: 1) The development of an extensive after-school academic support system, focused on academic rigor, homework support, fundamental study skills, and academic mentoring; 2) The development of a mentoring program to help youth stay focused on academics, reduce entry into gangs and criminal activities and provide a sound source of support; 3) The development of an entrepreneurship program to provide youth that may not be headed for college an alternative career track; and, 4) The development of a higher education preparation and awareness program to expose youth and their parents to the knowledge and strategies needed to prepare, apply, finance and succeed in college.
- PHA will continue to implement a Resident Mortgage Assistance Program (RMAP) comprehensive benefit package to assist residents in achieving homeownership by providing closing cost assistance, writing down the cost of the home and providing free financial counseling.
- PHA is continuing to pursue and enhance its partnerships with local universities to help provide more opportunities for public housing residents to attend college. To that end, PHA is exploring the possibility of establishing an endowment that could be used to support the educational programs, room and board and other expenses for public housing residents attending college.
- PHA will continue to implement its highly successful Section 3 job placement program.

Strategic Operating Plan Goals 6, 7 and 8: Improve Productivity and Cost Effectiveness of PHA Operations; Improve Program Compliance, Reporting, Performance and Accountability; and, Maximize the Use of Technology to Improve the Efficiency and Accountability of PHA Operations

- PHA is making a number of energy efficiency improvements to a number of its properties, including the installation of a Supervisory Control and Data Acquisition (SCADA) computer system that will monitor and control all major building systems at 31 properties. Drexel University, in partnership with PHA, will conduct an evaluation and assessment of the short and long term benefits of the various efficiency strategies implemented by PHA using various types of engineering studies. As part of this effort, Drexel will prepare computer models designed to simulate energy usage and establish appropriate benchmarks for post-construction consumption. PHA has proposed extending this partnership to include HUD, in an effort to better leverage resources and enable future HUD energy policies to be informed by actual data.
- PHA will continue its Performance Management Initiative, which leverages cross-functional teams of staff in support of site-level improvement programs.
- PHA will continue to utilize technology and process improvement projects to streamline work and improve accountability.

- PHA will continue implementation of the Business Intelligence (BI) initiative, which provides management level dashboard displays. It provides historical, current, and predictive views of critical business operations.
- PHA will continue implementation of the Partner Campaign CRM software to support tracking of PHA Social Service Partners. It is integrated with the agency-wide external Correspondence Management tools that track PHA outbound correspondence.
- PHA will continue implementation of the vacancy-tracking module to verify and expedite unit turnover. This module reports the status of all units and their various stages of readiness. Asset Managers can at a glance determine unit availability.
- PHA will continue implementation of the Enterprise Performance Management (EPM) software, which provides key business performance indicators via an Executive Dashboard. This implementation simplifies the viewing and tracking performance metrics.
- PHA will continue training and implementation of new public housing and waiting list software tools developed in tandem with PHA's CRM suite.
- PHA will update site based management plans for PHA and PAPMC sites.
- PHA will continue implementation of enhanced Interactive Voice Response and CTI systems in order to improve responsiveness to customer and public inquiries.
- PHA will continue implementation of Peoplesoft's CRM technologies to create tracking databases such as complaint tracking, incident tracking, MTW client tracking, investigations tracking and risk management tracking.
- PHA will continue to utilize NIKU's Clarity software to manage PHA's strategic operating plan and quality assurance project plans.
- PHA will continue to provide an array of employee training programs designed to upgrade skills and to maximize staff understanding of policies, procedures and systems.
- PHA will continue to implement alternative procurement systems including electronic procurement methods pursuant to HUD's letter to PHA dated October 16, 2008.
- PHA will continue implementation of ePro technologies.
- PHA will continue to conform to required investor and funding source requirements including timely submission of cost certifications for all Low Income Housing Tax Credit sites.

Strategic Operating Plan Goal 9: Expand Inter-Governmental Initiatives to Enhance the Ability of PHA to Deliver Sound and Effective Public Services

PHA will expand on its extensive network of government partners in support of its neighborhood revitalization and other MTW initiatives including:

- Newly proposed initiatives with the School District and other stakeholders to create charter school programs serving low-income youth.
- Enhanced partnerships with the Philadelphia Police Department and other stakeholders to implement major new public safety initiatives and a Law Enforcement Academy.
- Financial and programmatic support from the Commonwealth of Pennsylvania to support PHA's efforts to provide service enriched housing for seniors and people with disabilities.
- Financial support for PHA's employment and training initiatives, provided by the Commonwealth of Pennsylvania
- Provision of extensive financial support for PHA revitalization activities, through commitment of Low-Income Housing Tax Credits by the Commonwealth of Pennsylvania through the Pennsylvania Housing Finance Agency.
- A working relationship with the City of Philadelphia, Department of Public Health to reduce asthma triggers in Housing Choice Voucher (HCV) properties.
- A working relationship with the City of Philadelphia, Department of Human Services, to provide a cultural arts program for youth living in public and assisted housing.
- A working relationship with the U.S. Department of Labor in support of the Pre-Apprenticeship program.
- A working relationship with local universities to implement higher education in creating Residential Property Management as degree and certification programs.

IV. LONG-TERM MTW PLAN

During the first year of the MTW program, PHA established five (5) broad objectives for the MTW Demonstration Program, which provides a framework for long-term MTW implementation efforts. These objectives are:

- Reform the existing Housing Choice Voucher and Public Housing Programs to improve and increase the supply of quality affordable housing throughout the City of Philadelphia.
- Revitalize neighborhoods where MTW and MTW-eligible residents reside.
- Develop a MTW Family Program to furnish comprehensive family self-sufficiency services to eligible MTW families.
- Establish a Quality of Life Program to promote a living environment that fosters community values, encourages resident participation and positive peer group pressure, and reinforces the responsibilities of public housing residents, voucher participants, voucher landlords, and the PHA to one another and to the broader community.
- Establish efficient operating procedures and implement cost-saving strategies.

PHA maintains and monitors an updated Strategic Operating Plan (SOP) that addresses all facets of the agency's operations and provides a road map for PHA's long-term MTW strategy. The SOP is updated on a regular basis through the Clarity software system. A high level summary of the SOP follows:

Mission:

To provide quality housing for Philadelphia's low and very low-income families by improving facilities, achieving excellence in property management, providing opportunities for resident economic enhancement and workforce development, and by forming strategic partnerships with surrounding communities.

Goal 1: Achieve Excellence in Property Management.

Objectives:

- Improve physical characteristics and conditions of PHA properties.
- Implement scattered site and conventional housing site-based management plans to improve rent collection, occupancy level, recertification, and maintenance.
- Improve administration of the revised Admissions and Continued Occupancy Policy (ACOP).
- Develop and implement program of Tenant Responsibility and Lease Enforcement for Public Housing and the Housing Choice Voucher Programs.
- Ensure that all occupied rental properties (existing and post-construction) are regularly maintained, well managed, and generate positive net cash flow over time.

Goal 2: Achieve Excellence in the Management of the Housing Choice Voucher Program and Enforce Program Compliance.

Objectives:

- Develop and implement effective policies and improvements for the administration of the Housing Choice Voucher Program.
- Conduct workload analysis.
- Promote programs to improve landlord investment, participation and compliance in leased housing.
- Ensure property compliance with PHA's Housing Quality Standards (HQS), accessibility standards, local ordinances and regulations.
- Promote the Housing Choice Voucher Homeownership Program.
- Implement the Site-Based Operating Work Plan for all offices to promote the uniformity of satellite operations according to PHA standards and HUD regulations.

Goal 3: Develop Affordable Quality Housing that Supports Balanced Communities.

Objectives:

- Conduct Physical Needs Assessments of existing PHA properties for both conventional and scattered sites.
- Determine marketability of existing properties and proposed new developments and establish guidelines.
- Initiate master planning processes for conventional sites, scattered sites, and unit-based subsidized housing.
- Pursue and secure funding and financing alternatives for proposed projects.
- Implement and monitor new construction and redevelopment projects where financing and planning have been approved.
- Seek and promote re-use options for under-utilized ACC allocations from demolished public housing.
- Promote the use of the Unit-based voucher program.
- Develop and implement acquisition strategy for new properties as deemed appropriate.
- Continue implementation of the scattered sites homeownership program.
- Create development department resources and procedure guideline manuals.

Goal 4: Implement Public Safety Programs that Promote the Well-Being of Our Neighborhoods and the Accountability of Program Participants.

Objectives:

- Institute effective strategies through community policing that address crimes against persons and properties.
- Develop program to ensure Quality of Life through a Good Neighbor Policy.
- Establish community partnerships to assist PHA in promoting public safety programs with accountability.
- Establish Police Advisory Board that will include residents and police personnel.
- Establish strategic plan for risk management.
- Develop comprehensive fire safety plan for residents and employees.
- Eliminate immediate health/safety hazards throughout scattered site portfolio with priority given to areas selected for revitalization.

- Develop a plan that redefines the role of the PHA Police Department to focus on public safety programs for its residents and to transfer law enforcement functionality over to the City of Philadelphia's police department.
- Identify, manage, and mitigate PHA risk in the areas of lease enforcement and liability.
- Develop a plan to enhance the safety of and provide better asset management for PHA's inventory.
- To improve Quality of Life of PHA residents through the use of communications and technology.

Goal 5: Engage Other Institutions to Leverage Resources and Assist in Promoting Economic Enhancement and Supportive Services for PHA Residents.

Objectives:

- Develop educational, job training and work opportunities for residents.
- Provide youth development programs to improve academic performance, expand cultural awareness and encourage career exploration.
- Expand economic development initiatives to further benefit residents.
- Promote improved health care in PHA communities.
- Identify partners, and develop and secure resources to sustain and expand service programs.
- Establish a Community Service Program.
- Provide residents with financial and operational management training.
- Sustain, improve and expand senior programs and services to support, promote and enrich independent living and healthy lifestyles.
- Implement and expand affordable homeownership programs tailored to address local needs, priorities, and market conditions.
- Engage in fundraising strategies to expand current program services.
- Design a marketing plan to support resident programs and services.

Goal 6: Improve the Productivity and Cost Effectiveness of PHA's Operations.

Objectives:

- Improve PHA staff recruitment, retention and evaluation process.
- Annually identify and upgrade staff training programs to accomplish PHA business objectives.
- Explore business models to gain productivity, efficiencies, and cost savings.
- Fully implement Warranty-Tracking Improvement Plan and utilize data to enforce PHA contractual agreements.
- Implement Supply Chain Improvement Plan.
- Explore alternative insurance/liability coverage methodologies.
- Develop and implement a utility management savings plan.
- Improve HR processes.
- Improve financial and performance reporting.
- Improve risk management and insurance initiatives.
- Improve public leasing and admissions management.

Goal 7: Improve Program Compliance, Reporting, Performance and Accountability.

Objectives:

- Develop asset management protocol for all PHA and alternatively managed sites. Take steps to ensure that PHA consistently receives clean IPA, OIG and HUD audits.
- Implement approved management study recommendations.
- Develop a PHA-Wide process for management reviews of non-HUD grant programs.
- Improve contract monitoring, performance, reporting and recordkeeping.
- Implement approved audit plan to confirm performance of site-based managers.
- Develop, improve, and enhance a business process flow for compliance, monitoring, and reporting in Affirmative Action and contract compliance.
- Manage PHA's affiliate management corporations.
- Develop, improve, and enhance a business process flow for compliance, monitoring and reporting for the Move to Employment Section 3 program.

Goal 8: Maximize the Use of Technology to Improve the Efficiency and Accountability of PHA Operations.

Objectives:

- Implement PeopleSoft Enterprise Resource Planning (ERP) System.
- Maximize the use of various computer technologies to automate data collection and improve productivity.
- Develop and implement a Client Management System.
- Implement Call Center Technology.
- Review use of all current technology applications and hardware for efficiency and upgrade/replace where indicated.
- Develop budgets with commitment account to allow general managers a greater role in budget planning.

Goal 9: Expand Inter-Governmental Initiatives to Enhance the Ability of PHA to Deliver Sound and Effective Public Services.

Objectives:

- Provide services to residents and the community through the establishment of agreements with Local, State, Federal and Private agencies
- Expand and participate in City intergovernmental initiatives with Department of Public Health, Department of Human services, Philadelphia Police Department, School District of Philadelphia and Department of Labor to promote provision of services such as Community Life Improvement Plan and Quality of Life Programs.
- Expand and participate in State intergovernmental initiatives with U.S. Department of Labor, U.S. Department of Education, Commonwealth of Pennsylvania Office of Long Term Living and Pennsylvania Housing Finance to promote provision of services.
- Expand and participate in Federal intergovernmental initiatives with HUD and other Federal Agencies to promote provision of services such as green technologies.

- Expand and participate in Private Agencies initiatives with Universities and Foundations to promote provision of services

V. PROPOSED MTW ACTIVITIES

Newly proposed MTW activities for MTW Year Ten are described in this chapter. PHA's ongoing MTW activities – including proposed changes to ongoing MTW activities are described in Chapter VI.

Proposed MTW Activity: Partnership Programs Initiative

A. Description of MTW Activity: PHA will use its MTW authority to expand housing options and service models for special needs and other targeted groups in partnership with universities, state and local governments, non-profit and for-profit organizations, and other stakeholders. This flexible, services-oriented model will build on the previously-approved Unit Based Leasing and Development Program and allow PHA to leverage PHA and partner resources to provide non-traditional housing options and related health care, educational and/or other necessary services to low-income families and individuals. This initiative differs from the Unit-Based Leasing and Development Program because of the integral and interconnected service-oriented component, which is not a requirement or focus of the Unit-Based program. Authorized features of the initiative include but are not limited to the following:

- Admissions and continued occupancy requirements for the initiative will vary from standard public housing or Section 8 requirements and will be determined on a project-by-project basis in order to promote seamless integration of the partner's subsidy sources with MTW block grant funds. Specific admissions and continued occupancy requirements which vary from those in PHA's current admissions policies will be included in the next MTW Annual Plan.
- Partnership initiatives must serve households earning 80% of AMI or below, and PHA's MTW funds may not be used to subsidize households who are not low-income.
- PHA will leverage its funds with other partner resources in order to avoid duplicative services and payments and to maximize the value of funds spent on the Partnership Initiative.
- Potential models include, but are not limited to, domiciliary care for seniors and people with disabilities, educational/housing options for youth including those aging out of foster care, and supportive transitional housing.
- Budgets and agreements between PHA and its partners will set the PHA subsidy level in an amount appropriate to the cost of operating the housing, as well as allowing for funds to support the capital and other cost of developing and maintaining the property.
- The type, size, and configuration of units will comply with the applicable local building codes for the applicable building type.

When initiating a Partnership Program activity, in addition to the components described above, PHA will use the following process and parameters:

- PHA will initially seek opportunities for partnerships and evaluate them as they arise. PHA will evaluate these opportunities based upon their potential benefit to low-income families or individuals in Philadelphia. PHA is presently in the process of evaluating

potential partnerships in the areas of education, service coordination with providers of services for elderly and disabled persons, and law enforcement to increase safety and security.

- After completion of the foregoing evaluation, if PHA decides to proceed with the partnership, PHA will negotiate and execute a Memorandum of Understanding or Agreement with the partner. This Memorandum of Understanding or Agreement will delineate the terms of the arrangement with the partner, including but not limited to the following: the roles and responsibilities of PHA and its partner; the goals and/or purpose of the partnership; the number of MTW housing units that PHA will be included in this partnership; the amount of funds to be contributed to the initiative by PHA for housing purposes; and the amount of funds to be contributed by the partner for service provision and other program costs.
- Unless as otherwise provided herein, PHA anticipates that the partnership arrangements will comply with the following additional provisions:
 - PHA does not expect that its subsidy amount will exceed 150% of the HUD-published Fair Market Rents, as modified each year by HUD.
 - The PHA partnerships will seek to leverage an amount that is lower than 50 cents per dollar of operating costs paid for with PHA's MTW funds.
 - If there are potential partnerships that fall outside the above two safe harbors, PHA will review the potential partnerships with HUD prior to implementing such partnerships.

B. Statutory Objective: This initiative will support the MTW statutory objectives of increasing housing choice by making additional housing opportunities available to low-income families and of reducing costs and achieving greater cost effectiveness in federal expenditures by creating new cost effective service/housing delivery models.

C. Anticipated Impacts: PHA anticipates that this initiative will result in the development of new housing and service delivery programs that address populations who have not been traditionally well-served by existing federally subsidized housing programs.

D. Baseline and Benchmarks: The baseline for this initiative is 0 units of service-oriented housing. The benchmark is creation of up to 500 units over 5 years. Additional benchmarks for specific projects will be set forth in subsequent Annual Plans as described above.

E. Data Collection Process: PHA will use internal resources to track and monitor the number of units assisted under the program by type, the populations served by income level and related information.

F. Authorization: Second Amendment to MTW Agreement/Amendment to Attachment D to Allow for Broader Use of Funds Authority

G. Hardship Policy: Not applicable

Proposed MTW Activity: Scattered Site Income Tiering

A. Description of MTW Activity: PHA intends to implement income-based preferences at scattered site properties. The policy includes selection and admission of established percentages of applicants from the Waiting Lists by income tier in order to achieve PHA’s deconcentration goals. PHA will periodically review and modify these percentages to achieve desired deconcentration goals. PHA proposes the following schedule for initial implementation:

- 25% of applicants selected from the Waiting List will have incomes at or below 30% of AMI
- 25% of applicants selected from the Waiting List will have incomes between 31% and 50% of AMI
- 25% of applicants selected from the Waiting List will have incomes between 51% and 65% of AMI
- 25% of applicants selected from the Waiting List will have incomes between 66% and 80% of AMI

If there are no applicants on the Waiting List who meet the established income preferences and the unit is ready for re-rental and leasing and the unit has been vacant for more than sixty consecutive days, PHA will offer occupancy at scattered sites to eligible families outside of the established income preferences.

B. Statutory Objective: This activity supports the MTW statutory objectives of promoting economic self-sufficiency and expanding housing choice.

C. Anticipated Impacts: This activity will assist PHA in achieving income mixing and deconcentration goals.

D. Baseline and Benchmarks: The following table provides the current baseline of gross household incomes by tier in the scattered site portfolio, as well as the 10 year goal for income tiering under this initiative. The timeline for this initiative is lengthy to allow for turnover of sufficient number of units in order to achieve income mixing.

Tier	% of Current Scattered Site Households	Target Percentage Projected for 2019
30% of AMI or less	79.9% (n=3473)	25%
31-50% of AMI	12.8% (n=555)	25%
51-65% of AMI	3.8% (n=166)	25%
66-80% of AMI	1.4% (n=63)	25%
>80% of AMI	1.3% (n=60)	0%

E. Data Collection Process: PHA will use internal resources to track and monitor the income levels and targeting requirements set forth in this initiative. This information will be reviewed and analyzed as part of the Annual Report process.

F. Authorization: MTW Agreement, Attachment C, Paragraph C 2 and 3

G. Hardship Policy: Not applicable

Proposed MTW Activity: Expanding Use of Low-Income Housing Tax Credit (LIHTC)

A. Description of MTW Activity: In appropriate circumstances, PHA will use its broader use of funds authority to purchase, finance and/or develop properties using its MTW block grant funds and LIHTCs. Such properties may not be operated under either the public housing or local unit-based subsidy programs. All sites selected for this MTW activity must comply with PHA's MTW alternate site and neighborhood standards and with other HUD requirements, including environmental requirements, from which PHA is not exempt under MTW.

When initiating a LIHTC program activity, PHA will use the following process:

- If an opportunity for purchase, finance, or development of a property arises, PHA will first evaluate the economic and other feasibility of investing its resources in a LIHTC transaction at that property. As part of this evaluation, PHA will review the characteristics of the neighborhood in which the property is located, including demographics such as income level. PHA will also evaluate whether the site complies with its MTW alternate site and neighborhood standards.
- If PHA determines that it is economically and otherwise feasible to pursue a LIHTC transaction at that property, PHA or an affiliate will apply for LIHTCs.
- If PHA's application for LIHTCs is successful, PHA will include a description of the LIHTC project in its next MTW Annual Plan, along with benchmarks for purposes of evaluating this MTW activity at that project.

B. Statutory Objective: This initiative will support the MTW statutory objectives of increasing housing choice by making additional housing opportunities available to low-income families.

C. Anticipated Impacts: PHA anticipates that this initiative will result in the development of new housing for low-income families. It will enable PHA to provide housing for families with a broader mix of incomes than it currently serves. In addition, PHA will be able to serve more families in a variety of neighborhoods through this initiative.

D. Baseline and Benchmarks: The baseline for this initiative is 0 units. The benchmark is creation of up to 300 units over 5 years. Additional benchmarks for specific projects will be set forth in subsequent Annual Plans as described above.

E. Data Collection Process: PHA will use internal resources to track and monitor the number of units assisted under the program by type, the populations served by income level, the location of the units in Philadelphia, and related information.

F. Authorization: Second Amendment to MTW Agreement/Amendment to Attachment D to Allow for Broader Use of Funds Authority

G. Hardship Policy: Not applicable

VI. ONGOING MTW ACTIVITIES

This section of the Annual Plan summarizes PHA's ongoing MTW activities, i.e. MTW initiatives that have been previously submitted and approved. Where applicable, information is provided on proposed Year Ten changes/modifications to existing initiatives.

MTW Activity: Neighborhood Development and Revitalization Initiatives

Description/Update: PHA utilizes MTW authority to substantially increase housing choices for residents and applicants. PHA is continuing to implement an ambitious program of new construction, substantial rehabilitation and modernization designed to revitalize PHA public housing developments, replace distressed housing lost to demolition and lack of capital funds, and improve Philadelphia's neighborhoods. Since the year 2000, PHA has completed construction or modernization on 6,268 housing units, of which 5,033 were completed during the MTW Demonstration period. Work is underway on an additional 1,024 units. To support its redevelopment activities, PHA continues to implement the following MTW components:

- **Design Standards** - PHA continues to implement reasonable and modest design standards for new construction and rehabilitation work that mirror current design trends and the 21st century needs of residents. Modified design standards take into account efficiencies in energy usage, construction methods and technologies, and use of interior and exterior space. PHA standards also incorporate modern amenities and the latest concepts in urban design in order to reduce the negative connotation of public housing for PHA residents and to enhance the livability and marketability of PHA's housing stock. This activity, introduced and implemented in MTW Year 3, is ongoing.
- **Total Development Cost Limits and Housing Cost Caps** - PHA has established and maintains reasonable cost limits for development and redevelopment activities that replace HUD's Total Development Cost (TDC) limits and Housing Cost Caps (HCC). New cost limits reflect all the costs associated with developing new PHA conventional and Scattered Sites and rehabilitating existing units in these categories. PHA cost limits address current construction practice costs while incorporating energy efficient and environmentally sound equipment and materials used in the building process. They support the development of accessibility features in units and throughout the development. In addition, the establishment of new cost limits takes into account the market trends in construction and union rates, Davis Bacon rates and costs associated with government contract work versus private market contract work. The cost limits incorporate the cost of modern design amenities to improve PHA's marketability. This activity was introduced and implemented in MTW Year 3 and is ongoing.
- **Streamlined Mixed-Finance Development Process** - PHA is authorized to develop public housing through several financing methods, including the mixed-finance approach, which involves the use of both private financing and public housing development funds. According to public housing regulations, PHA and its partners may select among several

ownership structures for mixed finance transactions. These structures may include total private ownership, where PHA does not hold an ownership interest; total ownership by PHA; or a mixture of partial ownership by PHA and its partners. The various arrangements may necessitate different documents, especially for those transactions with third party-developers/owners for which PHA will provide capital or ACC subsidy only. These mixed finance developments may consist of all public housing units or a mixture of public housing and market rate or non-public housing rental and homeownership units. This activity was introduced and implemented in MTW Year 3 is ongoing.

- **Streamlined Acquisition Process** - PHA is authorized to acquire sites without prior HUD approval, provided that the agency certifies that HUD site selection requirements have been met. Accordingly, PHA has established a public housing acquisition process as part of its streamlined mixed-finance process agreed to by HUD. This activity was introduced and implemented in MTW Year 1 and is ongoing pursuant to Attachment C, Section C(13) of its Amended and Restated MTW Agreement. PHA recognizes that the foregoing authorization does not exempt the housing authority from environmental approvals or other approvals required outside of the U.S. Housing Act of 1937, as amended.
- **Strategy for Development:** PHA has adopted a Development-Asset Management Strategy for Public Housing that takes a comprehensive neighborhood-by-neighborhood and block-by-block approach to redeveloping, consolidating, rehabilitating, demolishing, acquiring and disposing of scattered site units independently and in partnership with government and other local neighborhood based organizations. This activity was introduced and implemented in MTW Year 4 and it is ongoing.

Changes/Modifications in Year Ten: No changes are anticipated. However, PHA will continue to periodically update its TDC and HCC limits.

Evaluation: PHA uses internal resources to track and monitor the progress of these initiatives. In recent years, PHA hired contractors to conduct assessments of the impact of PHA development expenditures on the local/regional economy and on neighborhood property values.

MTW Activity: Service Enriched Housing for Seniors and People with Disabilities

Description/Update: PHA is collaborating with the Commonwealth of Pennsylvania and other local providers to develop and implement a range of service-enriched housing options for seniors and people with disabilities, including the following ongoing and planned program components. These activities were introduced and implemented beginning in MTW Year Eight (except where noted below) and are ongoing:

- **Assisted Living** - PHA has been working in partnership with DPW and many other advocates within the Commonwealth to draft regulations for the Commonwealth of Pennsylvania's new law regulating assisted living residences. Assisted living units provide food, shelter, personal care assistance or supervision, and supplemental health

care services with 24-hour oversight. Subject to the availability of Medicaid waiver funding and the promulgation of applicable statewide assisted living regulations, PHA intends to develop up to 1,000 affordable assisted living units. Assisted living services may be provided in both newly constructed developments and existing PHA senior sites.

- **Adult Day Care** - Adult Day Care provides non-medical supportive day services to eligible elderly persons. Adult Day Care includes assistance with activities of daily living, medication reminders, social activities, meals and snacks, and educational programs. An affiliate will administer the Adult Day Care program services. The first Adult Day Services facility is located at the Nellie Reynolds Garden senior housing development. Both PHA residents and neighborhood residents are eligible to participate in the program. PHA has received licensing approval for the facility and service components. Services will be operational in 2010.
- **Home Care Services** - Home Care Services for seniors will be available to eligible residents living at the Nellie Reynolds Garden development and other PHA sites. PHA has established an affiliate that will be a Home Care Agency eligible to provide Home Care Services under Pennsylvania requirements. In addition to services provided by Adult Day Care, residents will be eligible for transportation to and from health care providers, laundry and housekeeping services, and emergency response services.
- **LIFE Programs** - PHA's nonprofit affiliate Philadelphia Asset and Property Management Corporation ("PAPMC") has entered into leases with LIFE providers at Conswiller B. Pratt Building, located at Greater Grays Ferry Estates ("GGFE") and Germantown House. The LIFE programs provide comprehensive medical, health and social services to enable elderly participants to age in place, at home, as independently as possible, for as long as desired and feasible. To qualify for LIFE Program services, participants must be elderly, in need of services to assist them in activities of daily living, and Medicaid-eligible. This program was introduced and implemented beginning in MTW Year Six and is ongoing.
- **Nursing Home Transition** - The Nursing Home Transition Initiative (NHTI) is a partnership with DPW that assists persons transitioning out of nursing homes to access affordable housing. As part of NHTI, PHA administers seventy-five (75) State-supported vouchers for referrals of disabled consumers in need of low-income housing. NHTI households may be eligible for a preference for public housing or HCV. In addition, PHA has entered into an MOU with Liberty Resources, Inc. to refer to PHA disabled households who may be eligible for a preference for public housing or HCV. PHA utilizes its MTW flexibility to increase HCV payment standards up to 120% of the HUD Fair Market Rents in order to secure housing, subject to rent reasonableness.
- **Accessible Unit Retrofitting and Development** – PHA's capital planning program includes development of new accessible units and retrofitting of existing units to meet the standards at Attachment E of the MTW Agreement. As part of these efforts, PHA will certify to HUD that an additional 152 units to HUD meet the standards of Attachment E of PHA's MTW Agreement in Year 10.

- **Definition of Elderly** – An elderly person is defined as an individual who is at least 55 years old. An elderly family is defined as one with a head of household, co-head, spouse or sole member who is at least 55 years old. For the purposes of admission to public housing designated as elderly-only, the definition of *elderly* and *elderly family* for each designated project will be specified in PHA's Designated Housing Plan in effect and may differ from the foregoing definition. This was implemented in MTW Year Three and is ongoing.
- **Changes/Modifications in Year Ten:** In MTW Year Ten, PHA intends to continue and expand on the program activities described above. In addition, PHA intends to enter into new partnership(s) with local universities, health care providers and other stakeholders to expand service enriched housing options for seniors and people with disabilities including, if feasible, implementation of a prepaid inpatient health care or other similar program.

Evaluation: PHA uses internal resources to track and monitor the progress of these initiatives.

MTW Activity: Simplification and Streamlining of Rent, Recertification and Inspection Processes for Public Housing and HCV

Description/Update: PHA is implementing a series of initiatives in the public housing and HCV programs designed to streamline administrative processes, reduce paperwork burdens on residents, and encourage families to work and increase their incomes. The following is a summary of ongoing and planned program components:

- **Two and Three-Year Recertification** – PHA has restructured the annual and interim review processes and procedures for HCV and public housing to require recertifications every two years except for residents choosing ceiling rents who are recertified every three years. Rent increases due to increases income, other than increased income due to changes in family size, are only applied at regular recertifications. Interim recertification are only required for decreases in resident incomes or increases in family size. Interim recertifications are restricted to one every six months, with elderly and disabled households exempted from this restriction. Initial lease terms are for two years with additional two year renewal periods. After the initial lease term, owners of HCV units may request rent increases annually. This activity was implemented in Year 3 and is ongoing.
- **Ceiling Rents** – PHA has established ceiling rents for its public housing developments, which are periodically updated. This activity was implemented in Year 3 and is ongoing. Ceiling rents for sites managed by PAPMC are set at the Pennsylvania Housing Finance Agency ceiling rent limits in effect for LIHTC properties.
- **Rent Calculation Method** – PHA has established an alternative rent structure for the HCV and public housing programs to motivate residents to work and accumulate savings.

Note that residents living in LIHTC units are not subject to this system. Public housing residents may elect a ceiling rent in lieu of the income based calculation method. PHA's rent simplification system includes the following components: establishing a single working household deduction; modifying the definition of income to exclude the first \$500 of asset income as well as certain Medicare related insurance premiums; eliminating other deductions and reducing the standard rent calculation percentage based on family size; and, establishing a \$50 minimum rent after a 90-day grace period. Minimum rents have been implemented in both the leased housing and public housing programs. This activity was implemented in Year 3 and is ongoing.

- **Payment Standards** – PHA has implemented a policy in the HCV program whereby the current payment standard is applied at regular recertification. This activity was implemented in Year 7 and is ongoing.
- **Reasonable Rent** – PHA has developed and implemented a reasonable rent policy for the HCV program whereby reasonable rent determinations are completed at initial lease up, upon request for a rent increase and at other times PHA deems it necessary to conduct a reasonable rent re-determination. This activity was implemented in Year 7 and is ongoing.
- **Property Specific Rent Policies** – Subject to prior agreement with PHA and individual property owners, PHA has established property-specific rent increase policies for HCV units. These policies are designed to attract and maintain owners with units that are consistently updated and have greater amenities. For example, such agreements may state that owners of specific units will be entitled to 100% of the Fair Market Rent (FMR) in effect. If the FMR goes down from one year to the next, PHA will not decrease the contract rent as long as the rent is reasonable. This activity was implemented in Year 6 and is ongoing.
- **Utility Allowances** – PHA is preparing to implement a revised utility allowance methodology: a) The revised policy would require households that receive utility allowances for gas heat to participate in the PGW Customer Responsibility Program (CRP) if eligible. Participation in this program places a cap on the amount of money that eligible HCV and public housing residents will be required to pay for their gas utility payments based on household income, not consumption. (In the conventional public housing program, only scattered site residents receive utility allowances.) Utility allowance schedules are determined based on an analysis of the cost of reasonable consumption based on dwelling unit size/type. PHA will utilize the capped amount to calculate utility allowances due to residents except in those limited circumstances where the CRP amount exceeds PHA's consumption-based utility allowance schedule. The CRP capped amount will be factored into the rent calculation including the Total Tenant Payment calculation. With this change, residents will continue to have their Total Tenant Payment limited to no more than 30% of household income; b) Utility allowances will be phased out for residents with incomes at or above 80% of Area Median Income; c) PHA will review and modify public housing utility schedules each year based on an assessment of available HUD funding. PHA will apply the HUD determined operating

subsidy pro-ration factor to determine the actual utility schedule amounts. Revised utility allowances will be applied to a family's rent calculations at the next scheduled recertification after the allowance is adopted or at one time across all affected households. The approach taken will be at the discretion of PHA; and, d) PHA will establish a minimum threshold of \$20 for payment of utility allowance payments. This activity was approved in Year 8 and is ongoing.

- **HCV HQS Enforcement** – When PHA becomes aware of a life-threatening emergency at a HCV unit, it is PHA's practice to contact the HCV unit owner and schedule an inspection within 24 hours. If the HCV landlord fails the emergency inspection, a re-inspection is scheduled within 48 hours of the inspection failure. It is PHA's practice to conduct the re-inspection and enter the results of the inspection in its system within 72 hours. If emergency conditions are not abated within 72 hours, PHA will abate the owner's HAP contract. For non-emergency situations, consistent with current HUD regulations, Owners have up to 30 days to correct routine deficiencies. Extensions may be granted in extenuating circumstances on a case-by-case basis. If units fail after the second inspection for routine or emergency repairs, the unit will be terminated from the program. This activity was approved in Year 3 and is ongoing.
- **Service Orders** – For the public housing program, it is PHA's policy to respond to emergency service orders within 24 hours and to complete them within 72 hours. If the unit is damaged to the extent that conditions are created which are hazardous to the life, health, or safety of the occupants, PHA will complete or abate such conditions within 24 hours. It is PHA's policy to complete routine service orders within 35 days.

Changes/Modifications in Year Ten: PHA intends to make the following changes in Year Ten to this MTW Activity:

PHA intends to further modify the utility allowance policy to require tenants receiving either heat or electric utility allowances to enroll and participate in the PECO Customer Assistance Plan, LIHEAP and any other applicable programs that offer reduced rates, energy usage grants or other financial incentives to low income households. Similar to the PGW CRP program method described above, the financial benefits accruing to residents who participate in these assistance programs will be factored into the utility allowance calculation. Thus, for example, reduced per energy unit costs paid by tenants under PECO CAP will be utilized to calculate electric utility allowances for those tenants. An impact analysis describing the impact of PHA's MTW utility allowance policies is included in the MTW Plan appendix. Note also that PHA has provided recommendations to HUD for changes to the utility allowance regulations at 24 CFR 965 which would allow a similar approach to be utilized by non-MTW agencies.

PHA plans to commence implementation of the PGW/CRP and PECO utility allowance programs through a demonstration program wherein households that will be moving into three hundred (300) scattered site units that are currently being retrofitted with energy saving improvements would agree to (a) enroll in the local utility reduction programs and (b) permit PHA to provide utility allowances to a third party agent that will pay the utility bills. The third party agent will also collect data on utility consumption and cost at these sites. PHA hopes to

both achieve cost savings on utilities by ensuring it is not over-paying for utilities and be able to evaluate on an on-going basis the benefits of the cost saving energy improvements in these units. PHA will use this demonstration to determine if this approach should be implemented portfolio-wide.

PHA intends to implement a policy whereby across-the-board rent increases or rent freezes may be imposed upon owners in the HCV program. When and if an across-the-board rent increase is awarded, PHA will complete a reasonable rent determination at the time of the next annual HQS inspection and apply applicable policies related to reasonable rent when and if the rent is not reasonable.

PHA will adopt a policy not to provide a utility allowance for tenant supplied refrigerators and ranges. Philadelphia code requires that owners provide ranges in all rental units and the vast majority of the rental units in the jurisdiction also provide refrigerators.

PHA will implement a policy of self-certification of community service requirements for all non-exempt household members. At the time of regular recertification, each individual who is subject to the community service requirement will be required to self certify that they are in compliance with the community service requirement. Generally, families will be required to submit the self-certification to PHA, at the regular recertification interview. PHA will rely on the self-certification alone to verify compliance with community service requirements.

Residents who elect ceiling rent are not eligible for a utility allowance. Residents have the option of selecting an income-based rent in lieu of a ceiling rent.

Hardship Policy: For all of PHA's rent and utility allowance policies implemented pursuant to its MTW authority, PHA will consider exceptions to these policies on a case-by-case basis for families who can demonstrate a long term hardship will result from application of the policies to them, or as a reasonable accommodation. To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship and how the application of the rent or utility allowance policy to the family will affect the family.

Evaluation: In addition to internal monitoring and tracking of these initiatives, PHA has entered into a partnership with Drexel University to conduct energy simulation modeling and evaluation of both new construction and substantial rehab activities undertaken by PHA pursuant to the federal Stimulus bill and other funding sources. As appropriate, Drexel's reports and studies will be utilized to assess the impacts of the utility component of this MTW activity.

MTW Activity: HCV Program Participation

Description/Update: To encourage family economic self-sufficiency, PHA has implemented a number of requirements for participation in its local HCV Program in addition to the standard regulatory eligibility provisions:

- **Term Limits** – PHA has implemented a seven-year limit on participation in the Housing Choice Voucher program for household members who are able to work. Starting in MTW Year 3, all HCV participants were provided with MTW briefings that included information on time limits and services. Participants also signed MTW Family Agreements and, as appropriate, developed action plans. The time limit does not apply to households with a head, spouse or sole member who is elderly, or who is a person with a documented disability that prevents the household head from obtaining employment, or who meet other hardship situations as defined in the policy. Also, households participating in the Moderate Rehab and Housing Choice Voucher homeownership programs are not subject to the time limit. During the seven-year period the voucher holder is required to participate in MTW self-sufficiency activities based on their current status, with more intensive efforts geared to households on TANF or reporting zero income. See proposed modification below. This activity was implemented in Year 3 and is ongoing.
- **Moving to Work Family Agreement Addendum (MTWFAA)** – PHA has implemented a requirement for all HCV participants to sign a MTWFAA as a condition for approval of tenancy and continued occupancy. By signing the MTWFAA, participants agree to comply with all of the rules and regulations of PHA Housing Choice Voucher Program, including the terms and conditions described in the MTWFAA. Failure to abide by the HCV Program rules and regulations and terms and conditions of the MTWFAA may result in termination from the HCV program. This activity was implemented in Year 3 and is ongoing.
- **Family Economic Development Action Plan** – As part of the Moving To Work Family Agreement Addendum, households who receive Temporary Assistance to Needy Families benefits (Public Assistance) or who report zero income, must meet with PHA Economic Self Sufficiency staff and develop a Family Economic Development Action Plan (FEDAP). PHA has established a tiered hierarchy to identify households that are required to participate in the ESS program as well as households where participation is optional. The FEDAP includes scheduled meetings with Coordinators and establishment of ESS goals. Completion of the goals specified in the FEDAP is required under the Agreement. Failure to meet the goals specified in the FEDAP may result in termination from the HCV program. This activity was implemented in Year 3 and is ongoing.
- **Tenant Responsibility Training** - PHA requires all Housing Choice Voucher Program participants to participate in Tenant Responsibility Training at initial lease-up. This effort helps improve residents' understanding of their roles and responsibilities as good neighbors and PHA program participants.

Changes/Modifications in Year Ten: PHA recognizes that the current economic climate has made it difficult, if not impossible, for many HCV participants to keep or obtain jobs. The national unemployment rate in October 2009 was 10.2%. In the Philadelphia area in September 2009, the unemployment rate was 8.8%. Both rates represent a dramatic increase from last year's unemployment rates. The most recent national poverty rate calculated in 2008 was 13.2 %, which represented the highest poverty rate since 1997. In 2008 the poverty rate in

Philadelphia was 24.1%. With such high unemployment levels, the poverty rate for 2009 will most assuredly be even higher both nationally and in Philadelphia.

In light of the current recessionary economic conditions described above, PHA has determined that it will not terminate HCV benefits as a result of its seven-year term limit policy during MTW Year Ten. HCV participants will continue to be subject to term limits; however, terminations due solely to the term expiration will be held in abeyance. HCV participants will continue to be required to meet all of their program obligations including, but not limited to, compliance with their family action plans, subject to applicable hardship and other exemptions. PHA will continue to monitor unemployment, poverty rate, and other relevant data before making any further decisions regarding implementation of the term limit policy. Effected residents will be provided ample notice and the opportunity to apply for hardship exemptions prior to the termination of any HCV assistance under this term limit policy.

Evaluation: PHA uses internal resources to track and monitor the progress of these initiatives.

MTW Activity: Unit Based Leasing and Development Program

Description/Update: Expanding the supply of affordable housing in Philadelphia continues to be a major objective of the PHA MTW demonstration program. Under PHA's Unit-Based Leasing and Development Program ("UBV" or the "Unit-Based Program"), PHA negotiates contracts with for-profit and nonprofit private sector housing providers for unit-basing PHA's local rent Subsidy using MTW block grant funds (Operating, Capital, HCV) based on property-specific agreements. To date, PHA has selected Unit-Based Program for MTW HCV Funds participants through a competitive procurement process. This MTW initiative was originally approved in MTW Year Three.

PHA's Site Selection Standards for the UBV program will comply with the following requirements:

- The site must comply with the Fair Housing Act and Title VI of the Civil Rights Act of 1964 with respect to determining the location of newly constructed or acquired units.
- Units may be located in PHA's jurisdiction, including but not limited to the following types of urban areas: (1) An area of revitalization that has been designated as such by the governing jurisdiction, including Redevelopment Areas and Enhanced Enterprise Communities; (2) an area where public housing units were previously constructed and were demolished; (3) a racially or economically impacted area where PHA plans to preserve existing affordable housing; (4) in connection with a HOPE VI or other HUD-funded master planned development; (5) in areas where a needs analysis indicates that subsidized housing represents a low percentage of the total number of housing units in the area; (6) relocating units to an area with a lower concentration of public housing units; or (7) an area designated by the City of Philadelphia as a blight elimination zone.

- When developing or substantially rehabilitating 6 or more UBV units in a project, PHA will or will require an owner applying for the UBV assistance to advise current residents of the subject properties and representative community groups in the vicinity of the subject property by letter to resident organizations and by public meeting, of the revitalization plan. PHA will maintain documentation that this requirement has been met.
- PHA or an owner applying for the UBV assistance must conduct a housing needs analysis indicating that there is a real need for the housing in the project area.

The rent to the owners participating in the UBV program funded with MTW HCV funds will not exceed the lowest of 110% of the applicable fair market rent, the reasonable rent, the rent requested by the owner or such other amount determined by PHA to be appropriate for the unit based upon the nature of the unit and the RFP from which the owner was selected. For example, in certain cases, PHA believes a shallower subsidy is more appropriate.

Unless part of its “shallow” subsidy UBV program, PHA will not attach or pay UBV assistance to units that are already receiving another form of subsidized housing operating assistance. With respect to a shallow subsidy UBV program, PHA will not attach or pay UBV assistance to units receiving another form of subsidized operating assistance if the UBV assistance would be duplicative or would otherwise over-subsidize the unit. PHA may determine the effect of subsidy on rent to owners and the duplication of subsidy or excessive subsidy, subject to the requirements regarding subsidy layering as set forth in the HUD Reform Act of 1989.

PHA may unit-base up to 100 percent of the dwelling units in any UBV project or building.

Change/Modification in Year Ten: PHA intends to make the following modifications and clarifications to this MTW activity in Year Ten:

PHA may select its own units for project-basing with UBV assistance without a competitive process. Pursuant to Attachment C, Section D(7)(a), PHA may unit-base assistance at properties other than public housing properties owned directly or indirectly by PHA, including those owned by PHA affiliates or instrumentalities. For purposes of this selection method, a property that may be unit-based may be a former public housing property that has been converted to HCV assistance.

Pursuant to Attachment C, Section D(1)(f), under either the UBV program or the Partnership Initiatives, PHA may attach or pay UBV assistance using HCV MTW funds to unit types currently prohibited by standard Section 8 regulations including but not limited to shared living facilities. Such units must comply with applicable alternate MTW site and neighborhood standards.

An owner of a unit assisted under the UBV program for MTW HCV funds may elect to receive referrals from PHA’s waiting list or to use a site-based waiting list for selection of tenants for a site. For owners using a site-based waiting list, owners must refer families to PHA for eligibility screening.

A family residing in a UBV unit funded with MTW HCV funds may terminate the lease at any time after the initial term. The family must give advance written notice to the owner in accordance with the lease and provide a copy of such notice to PHA. Once a family terminates the lease, the family will no longer be part of the HCV or UBV program. Pursuant to PHA's MTW authority, PHA does not provide UBV participant families who want to move with tenant-based assistance with a tenant-based HCV voucher.

Evaluation: PHA uses internal resources to track and monitor the progress of these initiatives.

MTW Activity: Comprehensive Self Sufficiency, Homeownership and Family Supportive Services for Residents

Description/Update: A primary objective of PHA's MTW demonstration program is to support resident economic self-sufficiency including expanding the number of public housing and voucher participants who become first time homebuyers. Building on its existing network of social service programs and partners, PHA will continue to operate an MTW Family Program. PHA will continue to expand the existing network of collaborative working relationships with other local service providers, arrange for the provision of services to family members and develop and implement new and innovative programs to bridge identified service gaps. Participating families will receive case management and other support services during the term of their agreement, including housing-related services and other incentives to encourage continued participation in the Family Support Program. These activities were introduced and implemented in MTW Year 4 and are ongoing.

- **Service Coordination** - HCV participants and public housing residents are able to access Family Program services through Service Coordinator staff, referrals from case managers, and through staff at other PHA and partner locations. HCV households work with staff to develop self-sufficiency goals including full time employment at a living wage and completion of secondary education, if applicable, for all adult family members. Areas of training and support may include, but are not limited to, resident responsibility, occupational skills training, homeownership, small business development, attainment of additional educational goals, treatment for substance abuse, and conflict resolution training to manage domestic and community disputes.
- **Self Sufficiency offices and Community Centers** - As part of the MTW Family Program services, PHA will continue to operate Family Self- Sufficiency office through which public housing, HCV and other residents can access a wide range of employment, training and supportive service programs such as Pre-Apprenticeship Training, homeownership counseling, and Section 3 jobs. Currently PHA operates 5 community-based offices located strategically throughout the city to provide a one stop service and case support center for residents. The Community Partner office is also available for residents to receive similar support and services as well as additional service coordinator staff being located throughout the city to provide support and case management as needed.

In addition, PHA completed construction in 2004 of the John F. Street Community Center at 1100 Poplar Street. This center is a facility devoted to youth programs and activities including exercise, dance, recording/music studios, a computer lab/library, commercial kitchen, office space, meeting rooms and a large multi-purpose room. Additional centers have also been opened to support our aging residents and their community including centers at Greater Greys Ferry Estates, Germantown House and, most recently, Nellie Reynolds Garden that offers health services to frail seniors and disabled individuals. These senior oriented centers offer a full range of supportive health services and activities. PHA will expand and initiate relationships with partner agencies to provide services in education, economic development, employment and training, homeownership counseling, health, and childcare. Partners will conduct intake/enrollment, offer individual and group orientations, training and counseling, program activities and services, and conduct community seminars. Partners will work closely with PHA to minimize/eliminate differences in eligibility requirements to ensure full access to services by the public.

- **Community Partners** - The Community Partners program funds a range of supportive services including the nationally recognized Pre-Apprenticeship Program. The Community Partners program recruits new partners, expands the range of training programs, and provides incentives to encourage successful participation by residents. These programs are designed to provide residents with the skills to enter the construction, transportation, telecommunications, customer service, commercial driving, hospitality, call center, health and human services fields. In addition, Community Partners has an established Adult Basic Education and GED program available to build the foundation for learning and development, and Financial Literacy training. In Year Ten, PHA will continue to monitor the progress of existing Community Partners and select new Partners as appropriate.
- **Affordable Homeownership** - Expanding homeownership opportunities to public housing and voucher participants continues to be a major objective of PHA's MTE program. PHA is actively developing homeownership units throughout the City of Philadelphia. HCV, Section 32 and the 5(h) Programs also offer homeownership opportunities to PHA residents. PHA has coordinated its current homeownership program components under a single organizational structure to support streamlined intake and processing of interested applicants. Staff work with and refer residents to existing homeownership counseling agencies with histories of providing homeownership counseling services in Philadelphia.

Changes/Modifications in Year Ten: No changes are anticipated.

Evaluation: PHA uses internal resources to track and monitor the progress of these initiatives.

MTW Activity: Increase Housing Opportunities for the Homeless

Description Update: PHA is collaborating with the City of Philadelphia to provide a range of housing opportunities for homeless individuals and families as part of the ten-year Blueprint to End Homelessness:

- **Blueprint/Good Neighbors Make Good Neighborhoods** - As part of this initiative, PHA's Good Neighbors Make Good Neighborhoods Program makes housing

opportunities available for families leaving Transitional Housing (Blueprint to End Homelessness). In 2008, PHA agreed to provide up to 500 housing opportunities, within one year of the date of the MOU with the City of Philadelphia, to eligible Good Neighbor families consisting of public housing units, housing choice vouchers and other housing resources as defined in the MOU. In April 2009, the Board of Commissioners approved execution of a new MOU directly with the City of Philadelphia Office of Health and Opportunity for coordination and administration of an additional 500 housing opportunities under the Blueprint program, 200 for HCV and 300 for Public Housing. PHA has established a limited preference category for families in the Blueprint program. This preference category is capped so that on a fiscal year basis a total of 500 housing opportunities will be provided to eligible households. PHA may adjust the number and mix of vouchers and public housing units in its sole discretion depending on funding availability, demand and other factors. This activity was implemented in Year 3 and is ongoing.

- **Transitional Housing Facilities** – As part of its unit-based program, PHA intends to form partnerships to provide shelter space and transitional housing. The transitional housing facilities, which would be constructed using a variety of Federal, state and local funds including low-income housing tax credits, will provide a residence and services to homeless families for a period that is anticipated to be 12 to 18 months. Households will be required to sign annual leases with a 6-month extension option. Families' tenure in the facilities during this lease term and extension option will be subject to continued participation in services and compliance with program rules. At the conclusion of the initial lease term and/or the 6-month renewal option, PHA will not renew participants' leases. Instead, residents will leave the transitional housing program to enter conventional public housing units, the HCV program, or other housing. This activity is authorized pursuant to Attachment C, Section B(4) and Attachment D, Section II(B) of PHA's MTW Agreement. It waives certain provisions of 42 U.S.C. § 1437d(l)(1) and 24 C.F.R. § 966.4(a)(2), was approved in the Year 6 Annual Plan, and is ongoing.

Changes/Modifications in Year Ten: No changes are anticipated.

Evaluation: PHA uses internal resources to track and monitor the progress of these initiatives.

MTW Activity: Streamline the Admissions and Transfer Process

Description/Update: PHA has established a number of MTW policies designed to streamline the admissions and transfer policies for both public housing and HCV programs:

- **MTW Transfers** - PHA may authorize a limited number of split-family transfers from Public Housing to the Housing Choice Voucher program and vice versa. These transfers are referred to as MTW transfers. PHA provides for up to 50 Housing Choice Vouchers and 50 PH units to be transferred back and forth between PH and the HCV program. No more than 100 moves are authorized per fiscal year, and PHA does not anticipate a need for more than 100 moves per fiscal year. Eligibility is determined by PHA General Managers on a case-by-case basis, based upon immediate need, disability needs and

availability of vouchers or public housing units. Transfers are used to support witness protection activities, domestic violence prevention and other needs. If a resident transfers from Public Housing to the Housing Choice Voucher program, that resident will be subject to the Seven-Year Program Time Limit and HCV eligibility guidelines. Other transfers, including any transfers above the limit of 100 per year established herein, are subject to PHA's Transfer policies as defined in the ACOP and Administrative Plan. This activity was implemented in Year 4 and is ongoing.

- **Voucher Issuance** – PHA establishes a ninety-day period before reissuance of vouchers terminated by PHA due to noncompliance by HCV participants. This activity was implemented in Year 4 and is ongoing.
- **Restriction on Elective Moves** – PHA policy regarding moves during the initial lease term and during a two-year period applies to moves both within PHA's jurisdictions and initial moves outside of PHA's jurisdiction. Families are not permitted to move within PHA's jurisdiction during the initial term of assisted occupancy. The Executive General Manager must approve exceptions to this policy. Subsequent to the initial lease term, families are permitted to move only at the time of biennial recertification or under extenuating circumstances as defined in the Administrative Plan subject to PHA management approval. PHA may deny permission to move if the family violates HCV program obligations and/or owes PHA money. This activity was implemented in Year 7 and is ongoing.

Changes/Modifications in Year Ten: PHA intends to modify this activity as follows:

Once a family is housed as a participant of any PHA subsidized housing program, PHA will remove the family's name from all other PH Waiting Lists and/or HCV Waiting Lists. Additionally, PHA will require that the family sign a lease addendum whereby the family acknowledges that their name will be removed from all other PH Waiting Lists and HCV Waiting Lists. Further the lease addendum will stipulate that the family may not reapply to any PHA subsidized housing program until after the initial lease term and then only if the Waiting List for the desired program/development is open. For example, an applicant might be on the Site Based Waiting List for Fair Hill Apartments and the HCV Tenant Based Voucher Program Waiting List. The applicant's name comes to the top of the HCV Waiting List and the applicant is issued a voucher and subsequently finds and leases an HCV unit. The applicant's name would be removed from the Fair Hill Apartment's Waiting List and the applicant would not be able to reapply to Fair Hill or any PHA housing program/development until completion of his/her two year lease term in the HCV unit. Applicants, as a reasonable accommodation, may request that their names remain on waiting lists once housed, and PHA, on a case-by case basis, will review these requests in order to accommodate the needs of a person with disabilities.

All household members must submit SSN documentation at the time of initial application or the application will not be entered on the waiting list. PHA will make alternate arrangement for taking applications from households that include members who are not US Citizen or do not have eligible immigration status. Failure to comply with this policy will result in denial of placement on the waiting list.

Participants who contend eligible immigration status and who have not previously disclosed a valid SSN must do so at their next scheduled or interim recertification within 90 days of PHA's request. PHA may grant an additional 90-day period, if there are unforeseen circumstances beyond the family's control that prevent the family from complying with the SSN requirements or there is a reasonable likelihood that the participant will be able to disclose a SSN by the deadline. Adults processed to be added to the household are required to provide documentation of a valid SSN before approval for occupancy in an existing PH or HCV household. If the proposed new member is a minor child and has no SSN, documentation to verify the SSN must be provided within 90 days of the child being added to the household. PHA, at its own discretion, may give an additional 90 days for children under 6 if PHA determines that the participant's failure to comply was due to circumstances that could not have reasonably been foreseen and were outside the control of the participant. During the period that PHA is awaiting documentation; the child shall be included as part of the tenant household and the child shall be entitled to all the benefits of being a household member. If upon expiration of the provided time period, including any extensions, the tenant fails to produce a SSN for the child, the family will be subject to the penalties for failure to disclose a SSN. Failure to comply with this policy will result in termination of tenancy or assistance.

Evaluation: PHA uses internal resources to track and monitor the progress of these initiatives.

MTW Activity: Establish an ESCo

Description/Update: PHA may use an ESCo structure as authorized under its MTW Agreement to finance some of the energy efficiency improvements it intends to make to various public housing properties. This activity was introduced and approved in MTW Year Nine.

Changes/Modifications in Year Ten: No changes are anticipated at this time. Further HUD approvals for the ESCo as presently contemplated will not be required, as we currently contemplate the borrowing being secured solely by the energy improvements. In the event that further approvals are required pursuant to the MTW Agreement, PHA will seek the requisite HUD approvals.

Evaluation: PHA will use internal resources to track and monitor the progress of these initiatives including data generated by the BAS/SCADA system previously referenced.

VII. SOURCES AND USES OF FUNDING

A. Planned Sources and Uses of MTW funds

Table 9 lists planned sources and uses of MTW funds for MTW Year Ten. Actual sources and uses may vary based on the level of funding provided to PHA based on Congressional appropriations and the level of actual expenses.

Table 9 – Consolidated Sources and Uses of MTW Funds Year Ten

SOURCES	
Operating Subsidy	119,726,860
Capital/Replacement Housing Fund	74,116,894
Housing Choice Voucher Program	173,802,378
Dwelling Rental Income	23,600,000
Investment Income	859,183
Miscellaneous Income	340,190
TOTAL REVENUE	\$ 392,445,505
USES	
Administrative	29,093,048
Tenant Services	887,574
Utilities	29,007,261
Maintenance	36,035,677
Protective Services	3,583,636
General Expense	44,673,603
Capital Improvements/Additions/Replacements	1,000,000
Tenant Based Voucher Assistance	127,568,561
Family Program	7,740,053
Quality of Life Program	1,000,000
Management Improvements	10,000,000
Capital Activities	27,493,764
Capital/Replacement Housing Projects	74,116,894
TOTAL EXPENSE	\$ 392,200,071
OPERATING INCOME/(LOSS)	245,434
Reserve Buildup	245,434
NET INCOME/(LOSS)	0

B. Planned Sources and Uses of State and Local funds

Table 10 lists planned sources and uses of state and local funds projected for MTW Year Ten. Actual sources and uses may vary based on the level of funding provided to PHA and the level of actual expenses.

Table 10 –Sources and Uses of State and Local Funds Year Ten

SOURCES	
Summer Food Program	142,875
Housing Coordinator Initiative	321,160
Tenant Based Rental Assistance	1,069,110
Miscellaneous Income	206,883
TOTAL REVENUE	1,740,028
USES	
Administrative and General	670,918
Housing Assistance Payments	1,006,560
Administrative Fees	62,550
TOTAL EXPENSE	1,740,028
OPERATING INCOME/(LOSS)	0
NET INCOME/(LOSS)	0

C. Planned Sources and Uses of Non-MTW funds

Table 11 lists planned sources and uses of other funds projected for MTW Year Ten, excluding state and local funds. Actual sources and uses may vary based on the level of funding provided to PHA and the level of actual expenses.

Table 11 – Consolidated Sources and Uses of Non-MTW Funds Year Ten

SOURCES	
Grants	169,160
Program Income *	5,690,615
Non-MTW Vouchers	3,661,334
Family Self-Sufficiency	291,216
Mainstream	316,899
VASH	568,819
MOD/SROs	3,155,046
Administrative Fees	1,356,364
TOTAL REVENUE	\$15,209,453
USES	
Administration and General Expense	1,800,114
Operations and Maintenance	16,626
Housing Assistance Payments	7,702,098
Capital Projects	5,690,615
TOTAL EXPENSE	\$15,209,453
OPERATING INCOME/(LOSS)	0
Reserve Buildup	0
NET INCOME/(LOSS)	0

*Program income reflects anticipated income in the form of Developer Fees from Warnock I, II, Marshall Shepard Village, and Nellie Reynolds Garden; and Bridge Loan Repayments from Nellie Reynolds Garden.

D. Cost Allocation Plan

Pursuant to its MTW Agreement, PHA has developed a Local Asset Management Plan that describes the agency's cost allocation plan and other technical components of PHA's local asset management strategy. HUD approved PHA's Local Asset Management Plan as part of the MTW Year Nine Annual Plan submission. A copy of the approved Plan is found in Appendix A.

E. Use of Single Fund Flexibility

Under the MTW Program, PHA is authorized to establish an MTW Block Grant budget. PHA's MTW budget focuses on five core areas:

- Reform of the Housing Choice Voucher Program
- Revitalization of neighborhoods where PHA residents and PHA-eligible residents reside
- Development of a Family Program to provide comprehensive self-sufficiency services to eligible residents
- Establishment of a Quality of Life Program that fosters community values, resident and landlord participation and improved neighborhoods.
- Establishment of efficient operating procedures and the implementation of cost-savings strategies

Development of annual budgets structured around these core areas allows PHA to further its mission and to deliver services in a more efficient and effective manner.

Public Safety Initiative (Subject to securing local law enforcement and other partner resource commitments)

In response to community concerns about increases in violent crime in neighborhoods adjacent to PHA developments, PHA will, subject to availability of partner financial and other resource support, implement a comprehensive public safety initiative. The initiative will utilize best practice research on community policing strategies, and will combine law enforcement, community involvement, social services and PHA capital and management strategies. During initial implementation, PHA will select up to six (6) sites. Each site will have:

- Anti-Crime Team – The teams will be led by a police sergeant supervisor, and will include police officers skilled in conflict resolution, domestic violence response and other key competencies. An additional team member will be a social service coordinator skilled in case management and program management. Relief officers will be assigned as needed, and will divide time across all sites.
- Operations Plan – Each site will have an overall plan including a deployment schedule permitting daily contact among all team members at each site. The plan will establish

procedures for the social service coordinator to work closely with police officers, and to follow up with casework and referrals for residents. This will include matching resident needs with existing programs offered by PHA and/or its Community Partners.

VIII. ADMINISTRATIVE

Resolution

RESOLUTION NO. 2 11304

RESOLUTION AUTHORIZING THE EXECUTIVE DIRECTOR OF THE PHILADELPHIA HOUSING AUTHORITY (“PHA”) TO SUBMIT A MOVING TO WORK (“MTW”) ANNUAL PLAN (“PLAN”) FOR MTW YEAR TEN, PHA FISCAL YEAR 2011, TO THE US DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (“HUD”) AND TO ENTER INTO AN AMENDMENT TO THE MTW AGREEMENT

WHEREAS, the United States Department of Housing and Urban Development (“HUD”) administers a Moving to Work (“MTW”) Demonstration Program that is designed to provide the opportunity for selected Housing Authorities to explore and demonstrate more efficient ways to provide and administer low-income housing; and

WHEREAS, pursuant to Philadelphia Housing Authority (“PHA”) Board of Commissioners (“Board”) Resolution No. 10618, dated December 21, 2000, PHA submitted to HUD an MTW Application Plan and Agreement, which details strategies to improve the facilities, operations, management and opportunities for Public and Housing Choice Voucher (formerly, Section 8) residents; and

WHEREAS, pursuant to PHA Board Resolution No. 10764, dated February 28, 2002, the Executive Director of PHA (the “Executive Director”) executed a MTW Demonstration Agreement (“MTW Agreement”) on behalf of PHA which expired on March 31, 2008; and

WHEREAS, pursuant to PHA Board Resolution No. 11241, dated August 21, 2008, the Executive Director entered into a new ten-year Moving To Work Agreement with HUD effective October 16, 2008; and

WHEREAS, as a participant in the MTW Demonstration Program, PHA is required to develop MTW Annual Plans for each fiscal year during the term of the MTW Agreement, which Annual Plans outline the PHA budget and MTW activities in the format required under the MTW Agreement; and

WHEREAS, PHA is required to submit each Annual Plan for approval by its Board at least seventy-five (75) days prior to the beginning of each fiscal year; and

WHEREAS, PHA has developed the MTW Annual Plan for MTW Year Ten, PHA Fiscal Year (“FY”) 2011. The Annual Plan includes an analysis of the impact of proposed changes to PHA’s utility allowance policies on applicants and residents; and

WHEREAS, subject to HUD approval, PHA proposes to amend the MTW Agreement to allow for use of MTW funds to implement a broader range of activities that fall outside of Sections 8 and 9 of the US Housing Act of 1937. By letter of October 1, 2009, HUD advised that PHA and all other MTW agencies may utilize such broader authority subject to submission of an acceptable proposal to HUD and execution of an amendment to the MTW Agreement; and

WHEREAS, PHA is required to provide opportunities for resident and public participation and comments on the Annual Plan and the proposed Amendment including scheduling at least one (1) public hearing and to take into consideration any comments received as part of the final Annual Plan; and

WHEREAS, PHA conducted a public hearing on December 17, 2009 and additional pre-meetings on with residents to review the draft Annual Plan and the proposed Amendment, and subsequently made changes to the final Annual Plan to incorporate resident and public comments; and

WHEREAS, PHA is a block grant agency and the MTW Annual Plan includes a consolidated budget in accordance with the MTW Agreement.

BE IT, THEREFORE, RESOLVED that the Board of Commissioners of the Philadelphia Housing Authority does hereby:

1. Approve the Annual Plan and MTW Amendment, and authorize the Executive Director to:
1) Submit to HUD the PHA MTW Annual Plan for MTW Year Ten, PHA FY 2011, including the impact analysis contained therein; and 2) Take all steps necessary to secure HUD approval and implement initiatives as described in, the Plan, subject to receipt of adequate funding from HUD; and, 3) Certify that the Public Hearing requirement has been met; and, 4) Authorize the Chairperson of the Board to execute the attached HUD Certification of Compliance with MTW Plan Requirements and Related Regulations; and, 5) Execute the Amendment to the MTW Agreement.

I hereby certify that this was
APPROVED BY THE BOARD ON 11/14/10
[Signature]
ATTORNEY FOR PHA

Certifications

**Annual Moving to Work Plan
Certifications of Compliance**

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

**Certifications of Compliance with Regulations:
Board Resolution to Accompany the Annual Moving to Work Plan**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning April 1, 2010, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA and conducted a public hearing to discuss the Plan and invited public comment.
2. The Agency took into consideration public and resident comment before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan;
3. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
4. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
5. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
6. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
7. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
8. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
9. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
10. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
11. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
12. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58.
13. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.

14. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
15. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
16. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments.).
17. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.
18. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Philadelphia Housing Authority

PA002

PHA Name

PHA Number/HA Code

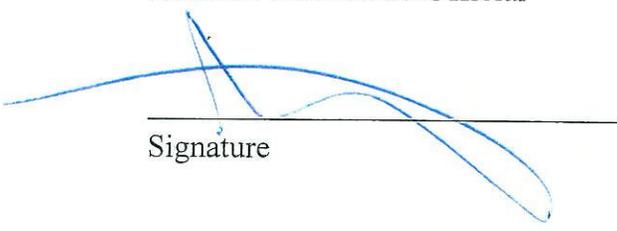
I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729,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

John F. Street

Chairperson, Board of Commissioners

Name of Authorized Official

Title


Signature

Date

Jan. 14, 2010

January 14, 2010

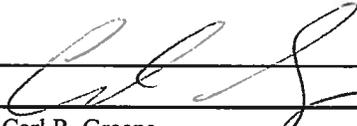
DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352

Approved by OMB

0348-0046

(See reverse for public burden disclosure.)

1. Type of Federal Action: <input type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance	2. Status of Federal Action: <input type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award	3. Report Type: <input type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Congressional District, if known: 2nd	5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:	
6. Federal Department/Agency: U.S. Department of Housing & Urban Development	7. Federal Program Name/Description: MTW Year Ten Plan CFDA Number, if applicable: 14.870	
8. Federal Action Number, if known:	9. Award Amount, if known: \$	
10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI): Not Applicable	b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI): <div style="text-align: right; margin-right: 50px;">  _____ </div>	
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.	Signature: _____ Print Name: Carl R. Greene Title: Executive Director Telephone No.: 215-684-4174 Date: 1/15/10	
Federal Use Only:		Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

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

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

1. Identify the type of covered Federal action for which lobbying activity is and/or has been secured to influence the outcome of a covered Federal action.
2. Identify the status of the covered Federal action.
3. Identify the appropriate classification of this report. If this is a followup report caused by a material change to the information previously reported, enter the year and quarter in which the change occurred. Enter the date of the last previously submitted report by this reporting entity for this covered Federal action.
4. Enter the full name, address, city, State and zip code of the reporting entity. Include Congressional District, if known. Check the appropriate classification of the reporting entity that designates if it is, or expects to be, a prime or subaward recipient. Identify the tier of the subawardee, e.g., the first subawardee of the prime is the 1st tier. Subawards include but are not limited to subcontracts, subgrants and contract awards under grants.
5. If the organization filing the report in item 4 checks "Subawardee," then enter the full name, address, city, State and zip code of the prime Federal recipient. Include Congressional District, if known.
6. Enter the name of the Federal agency making the award or loan commitment. Include at least one organizational level below agency name, if known. For example, Department of Transportation, United States Coast Guard.
7. Enter the Federal program name or description for the covered Federal action (item 1). If known, enter the full Catalog of Federal Domestic Assistance (CFDA) number for grants, cooperative agreements, loans, and loan commitments.
8. Enter the most appropriate Federal identifying number available for the Federal action identified in item 1 (e.g., Request for Proposal (RFP) number; Invitation for Bid (IFB) number; grant announcement number; the contract, grant, or loan award number; the application/proposal control number assigned by the Federal agency). Include prefixes, e.g., "RFP-DE-90-001."
9. For a covered Federal action where there has been an award or loan commitment by the Federal agency, enter the Federal amount of the award/loan commitment for the prime entity identified in item 4 or 5.
10. (a) Enter the full name, address, city, State and zip code of the lobbying registrant under the Lobbying Disclosure Act of 1995 engaged by the reporting entity identified in item 4 to influence the covered Federal action.

(b) Enter the full names of the individual(s) performing services, and include full address if different from 10 (a). Enter Last Name, First Name, and Middle Initial (MI).
11. The certifying official shall sign and date the form, print his/her name, title, and telephone number.

According to the Paperwork Reduction Act, as amended, no persons are required to respond to a collection of information unless it displays a valid OMB Control Number. The valid OMB control number for this information collection is OMB No. 0348-0046. Public reporting burden for this collection of information is estimated to average 10 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0046), Washington, DC 20503.

Certification of Payments to Influence Federal Transactions

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

Applicant Name

Philadelphia Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving to Work Year Ten Plan

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying, in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

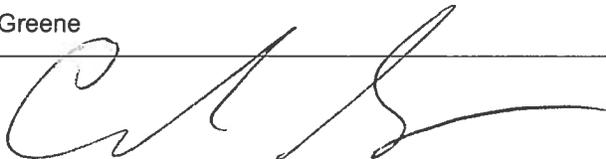
I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties.
(18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official

Carl R. Greene

Signature



Title

Executive Director

Date (mm/dd/yyyy)

1/15/2010

Certification for a Drug-Free Workplace

U.S. Department of Housing and Urban Development

Applicant Name

Philadelphia Housing Authority

Program/Activity Receiving Federal Grant Funding

Moving To Work Year Ten Plan

Acting on behalf of the above named Applicant as its Authorized Official, I make the following certifications and agreements to the Department of Housing and Urban Development (HUD) regarding the sites listed below:

I certify that the above named Applicant will or will continue to provide a drug-free workplace by:

a. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition.

b. Establishing an on-going drug-free awareness program to inform employees ---

- (1) The dangers of drug abuse in the workplace;
- (2) The Applicant's policy of maintaining a drug-free workplace;
- (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
- (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.

c. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph a.;

d. Notifying the employee in the statement required by paragraph a. that, as a condition of employment under the grant, the employee will ---

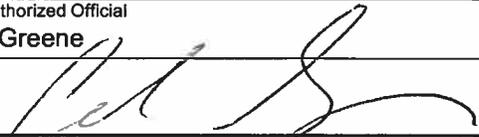
- (1) Abide by the terms of the statement; and
- (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federalagency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
- f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---
 - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
- g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

2. Sites for Work Performance. The Applicant shall list (on separate pages) the site(s) for the performance of work done in connection with the HUD funding of the program/activity shown above: Place of Performance shall include the street address, city, county, State, and zip code. Identify each sheet with the Applicant name and address and the program/activity receiving grant funding.)

Check here if there are workplaces on file that are not identified on the attached sheets.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official Carl R. Greene	Title Executive Director
Signature 	Date 11/15/10
X	

APPENDIX A

Appendix A – Local Asset Management Plan

Introduction

Pursuant to the First Amendment to the Moving to Work Agreement, in Fiscal Year 2010 (MTW Year Nine) the Philadelphia Housing Authority will implement a local asset management plan for its Public Housing Program as described herein. In the implementation of the plan, PHA will continue to adopt cost accounting and financial reporting methods that comply with OMB Circular A-87, OMB Circular A-133 and generally accepted accounting practices.

PHA's plan supports and is consistent with the agency's ongoing implementation of project based management, budgeting, accounting and financial management. PHA's project based management system emphasizes the provision of property management services that have met agency-wide standards while responding to the unique needs of each property. Day to day operations of PHA sites are coordinated and overseen by Asset Managers assigned to each property. PHA Asset Managers oversee the following management and maintenance tasks:

- Marketing and tenant selection
- Rent collections
- Routine and preventive maintenance
- Unit turnover
- Security
- Resident services
- Resident and community relations
- Capital improvements planning
- Other activities necessary to support the efficient operations of the site

In the implementation of these project level management activities, other PHA departments including Client Services, Public Safety, Maintenance, Development, ISM, Finance and Budget, Quality Assurance, and the Office of Strategic Management support PHA Asset Managers. Asset Managers are routinely provided with on-line detailed and summary management reports on budget status and all key performance indicators to facilitate their monitoring and oversight of property level activities. PHA also conducts multidisciplinary Performance Management meetings on a monthly basis, to allow for a thorough review of key performance indicators at the individual site and system-wide levels.

PHA Asset Managers develop and monitor property budgets with support from the PHA Finance and Budget staff. Budget trainings are held annually to support the budget development process. Asset Managers are provided with tools to develop their budget estimates including property-specific non-utility and utility cost data from the prior 18 months.

PHA's local asset management plan is consistent with the principles of asset management described in 24 CFR 990.255 and in the First Amendment to PHA's MTW Agreement. Further, the plan is generally consistent with the provisions of 24 CFR 990.260, 990.265, 990.270, 990.275 and 990.285. As allowed under the First Amendment to the MTW Agreement, PHA's local asset management plan deviates from parts of 24 CFR 990.280, including requirements related to property management fees and fees for services. PHA will utilize the Cost Allocation method referenced in paragraph 6.F.4.b of the First Amendment.

Due to the unique features of the Philadelphia market, PHA's housing portfolio, and the agency, PHA has determined that use of the Cost Allocation method is the most efficient, cost-effective means of achieving the asset management principles referenced above.

The factors that impact PHA's asset management plans include, but are not necessarily limited to, the following:

- Scattered Site Portfolio. PHA has over 4190 scattered site properties, which represents nearly 1/3 of its public housing portfolio. We understand this is far and away the largest scattered site public housing portfolio in the country. The geographic diversity of these scattered site units impacts warehouse operations, locations and numbers of management offices, and staffing requirements. The scattered site portfolio also includes a number of vacant lots, for which no HUD subsidy is received and for which a fee-based asset management approach could not be implemented. PHA has developed a strategy for reconfiguring this portfolio in a way that would be more cost-effective to operate which has been submitted to HUD for approval. Managing these sites presents unique challenges that PHA's asset management plans are structured to address.
- Aging Housing Stock. PHA operates one of the oldest public housing stocks in the country. It is more costly to operate than newer housing. PHA has engaged in an aggressive development program during the last few years to upgrade and redevelop its units. Due to a lack of adequate funds, this process is far from complete.
- Unionized Workforce. PHA has a heavily unionized workforce. Currently, PHA has contracts with approximately 11 unions. This significantly impacts the operations and costs of PHA's activities. As such, PHA's asset management plan is structured to be cost effective within the limits of these contracts.
- MTW Initiatives. Since the onset of its participation in MTW, PHA has sought to use its MTW flexibilities to implement agency-wide cost-cutting initiatives that will increase efficiencies, maximize use of federal dollars, and benefit PHA's clients. PHA has moved many functions to the site-based level, however a number of MTW initiatives require central administration so they can be adequately measured. For example, PHA has implemented innovative technological systems to maximize efficiencies in admissions, property management, and client services. There are costs associated with development and implementation of these systems before they are implemented at the site level. Under MTW, PHA has also implemented departmental oversight protocols through its Quality Assurance Program. PHA's quality control program has already made PHA's programs more efficient by reducing errors and

improving oversight. As a result of these efficiencies and of declining federal funds two years ago, PHA cut nearly 25% of its workforce.

- Local Costs. Philadelphia is an old, industrial city where labor costs for maintenance and construction activities are significant. These high costs can be attributed to, in part, prevailing wage requirements as well as the cost of materials and services in the Philadelphia market.

A description of the cost allocation plan and other technical components of PHA's local asset management plan follow.

I. AMP Definitions

An AMP will include any site that receives Operating Subsidies through HUD's Operating Fund Calculation. PHA will have two types of PHA managed AMPs and PAPMC/AME managed AMPs. The revenue and expense allocations will be different for each type since PHA's revenues and expenses vary for each site. (APPENDIX 1)

II. Balance Sheet Items (Assets, Liabilities & Equity)

All balance sheet accounts will need to be analyzed and distributed between the AMPs and the Indirect Cost Departments. On a monthly basis, PHA prepares balance sheet analyses to support the account balance, which includes the purpose and source of the balances. PHA's general ledger staff will use these analyses to distribute the balance sheet accounts to the AMPs and the Indirect Cost Departments. PHA plans to complete the balance sheet distribution by May 15, 2009 for presentation on the fiscal year ending March 31, 2009 financial statements.

A. Cash & Investments

PHA will distribute reconciled cash on the general ledger as of 4/1/08 between the PHA Managed AMPs and the Indirect Cost Departments except for the cash related to the insurance settlement for Plymouth Hall. This cash and the related liability will be presented with the Plymouth Hall AMP. PHA will not create new physical cash accounts with the bank for each of the PHA Managed AMPs. PHA's accounting system can separate the cash accounts between the PHA Managed AMPs. All cash activity will be paid or received through one physical bank account, but on PHA's ledger, the cash activity will be posted to cash for the PHA Managed AMPs. When cash receipts are received, the cash receipts will post to each of the individual PHA Managed AMPs to the cash and proper offset account for the appropriate PHA Managed AMPs. Checks that are written for direct expenses will be charged to the appropriate PHA Managed AMPs expense account and cash.

PHA has elected to charge each site for allocated indirect overhead and frontline expenses rather than utilizing the fee for service model. PHA will establish an account number for the indirect overhead and for the frontline expenses. PHA will post the allocated amounts to each of the PHA Managed AMPs on a monthly basis. On a monthly

basis, PHA will record on each of the Indirect Cost Departments ledger the cash receipts from the PHA Managed AMPs for the repayment of the indirect overhead and frontline expenses against the indirect overhead and frontline expenses accounts respectively. On the PHA Managed AMPs ledger, the same activity will show as a cash payment from the PHA Managed AMP and as expenses to the proper account. PHA's accounting system allows PHA to establish this as an automated process.

Investment income will be allocated between the Indirect Cost Departments and the PHA Managed AMPs. For the initial fiscal year ending March 31, 2009, interest will be allocated based on the calculated working capital. (APPENDIX 5) Each fiscal year, the percentage will be recalculated based on cash balances from the beginning of the respective fiscal year.

B. Tenant Accounts Receivable and Allowance for Doubtful Accounts

At fiscal year ending March 31, 2009, PHA will adjust the tenant accounts receivable balances for each of the PHA Managed AMPs to the appropriate PHA Managed AMP based on the latest tenant ledgers from Emphasis. PHA's accounting policies recognizes the tenant accounts receivable balance as the outstanding balance from all tenants in possession of a unit plus the outstanding balances due from tenants that have vacated during the fiscal year. All other vacated tenant accounts receivable balances are written off at the end of each fiscal year after board approval. PHA's tenant ledger from the Emphasis system will provide PHA with the data to separate these amounts. PHA will also adjust the allowance for doubtful accounts at fiscal year ending March 31, 2009, so that the balances are distributed to the PHA Managed AMPs.

PAPMC/AME Managed AMPs will not be included in the LIPH (Fund 001) financial statements. Tenant accounts receivable and allowance for doubtful accounts are included in the PHA Audited financial statements as a discretely presented component unit.

C. Other Accounts Receivable

Other accounts receivable will be distributed based on the purpose and source of the receivable. Receivables related to a PHA Managed AMP and PAPMC / AME Managed AMP will be distributed to the specific AMP. Any receivable that is not associated to a specific AMP will be distributed to the Indirect Cost Departments.

D. PHASI Assets and Liability / Worker's Compensation Liability

The PHASI and Worker's Compensation liabilities will remain with the Indirect Cost Departments. At this time, PHA has determined that these liabilities are PHA Agency Wide liabilities and not liabilities of the PHA Managed AMPs or the Indirect Cost Departments. However, PHA has utilized the LIPH (Fund 001) cash accounts in the past to pay most Agency Wide liabilities, than the LIPH (Fund 001) will receive reimbursements from other programs where applicable. The expenses related to the PHASI liability and worker's compensation liability will continue to be charged to appropriate programs or AMPs. PHA has created a cash reserve for each of these liabilities that have been funded over the years by all programs based on the allocation of

salaries. The cash reserves offset PHA's liabilities so that each of the liabilities is fully funded. PHA utilizes the reserves to pay the liabilities as needed. PHA will review the treatment of these liabilities and corresponding cash reserves on an annual basis to confirm that its treatment is appropriate.

E. Prepaid Insurance

The prepaid insurance balances for the PHA Managed AMPs will be distributed to the correct AMP based on the allocation used to allocate the insurance expense. PAPMC/AME Managed AMPs will not be included in the LIPH (Fund 001) financial statements. Prepaid insurance is included in the PHA Audited financial statements as a discretely presented component unit.

F. Materials Inventory

PHA currently maintains all maintenance materials inventory centrally. PHA is planning and implementing new materials inventory procedures to end the central maintenance system. PHA is moving to a just in time inventory method. PHA will be implementing an e-procurement system that will streamline the purchasing process by connecting the site managers material needs directly to the vendor. This will allow the site managers to order material as needed and receive materials only on an as needed basis. PHA will maintain a minimal emergency use only materials inventory at the Passyunk Homes site.

Currently, PHA maintains inventory at two warehouses. PHA has a Central warehouse located on Bartram Avenue. The inventory at this site is used for routine maintenance needs at all of PHA's sites. PHA plans to phase out this inventory warehouse within the next 24 months. The minimal emergency inventory that PHA will maintain will be moved to Passyunk Homes AMP after the full conversion to the e-procurement system. The other materials inventory warehouse is located at 1310 Lehigh Street. PHA's force account labor workforce utilizes this warehouse. PHA plans to phase out this warehouse by the end of fiscal year ending March 31, 2009.

PAPMC/AME Managed AMPs will not be included in the LIPH (Fund 001) financial statements. Materials inventory is included in the PHA Audited financial statements as a discretely presented component unit.

G. Fixed assets and accumulated depreciation

Fixed assets and accumulated depreciation will be reconciled to the PeopleSoft Asset Module and distributed to the appropriate PHA Managed AMPs and the Indirect Cost Departments. Any fixed assets in the Asset Module that are currently assigned to the Indirect Cost Departments will need to be verified for accuracy. PHA will need to analyze all fixed assets to determine the proper ownership of the asset and verify that all fixed assets are charged to the proper AMP or proper Department. PHA owns approximately 9,000 assets including land, buildings, building improvements and equipment that would need to be reviewed. PHA will also need to analyze and redistribute the land, building and building improvements between the Scattered Site

AMPs. PHA's Asset Module (AM) has been established for many years. AM provides PHA with the ability to prepare fixed asset and depreciation reports by AMP or department. AM tracks all of the fixed assets transactions and records all monthly fixed asset entries.

PAPMC/AME Managed AMPs will not be included in the LIPH (Fund 001) financial statements. Fixed assets and accumulated depreciation are included in the PHA Audited financial statements as a discretely presented component unit.

H. Accounts Payable and Accrued Liabilities

Other accounts payable and accrued liabilities includes all liabilities not specifically referred to in the following detailed liability categories. Other accounts payable and accrued liabilities will be distributed based on the purpose and source of the payable or liability. Payables or liabilities related to a PHA Managed AMP and PAPMC / AME Managed AMP will be distributed to the specific AMP. Any payable or liability that is not associated to a specific AMP will be distributed to the Indirect Cost Departments.

I. Payroll Liabilities

All payroll liabilities will continue to be presented with the Indirect Cost Departments. At this time, PHA has determined that these liabilities are PHA Agency Wide liabilities and not liabilities of the PHA Managed AMPs or the Indirect Cost Departments. However, PHA has utilized the LIPH (Fund 001) cash accounts in the past to pay most Agency Wide liabilities, than the LIPH (Fund 001) will receive reimbursements from other programs where applicable. The expenses related to the payroll liabilities will continue to be charged to appropriate programs or AMPs. PHA will review the treatment of these liabilities on an annual basis to confirm that its treatment is appropriate.

J. Compensated Absences

Compensated absences liabilities will be distributed between the Indirect Cost Departments and the PHA Managed AMPs based on where payroll is charged. No compensated absences liabilities will be distributed to the PAPMC / AME AMPs because no payroll will be charged to those AMPs.

K. Equity

Equity will be reclassified based on the redistribution of all assets and liabilities. By definition, the Invested in Capital Assets equity balance will follow the Net Fixed Assets that are owned by an AMPs or Departments. Invested in capital assets will be distributed between the Indirect Cost Departments and the PHA Managed AMPs based on where the Net Fixed Assets is distributed. As of March 31, 2008, the PHA Public Housing Program had \$358,873,693 of Net Fixed Assets and Invested in Capital Assets that needs to be distributed between the AMPs and the Departments.

The Public Housing Program had Unrestricted Net Assets as of March 31, 2008 of \$4,211,499 that must be distributed between the AMPs and Departments. PHA plans to complete the distribution of the Unrestricted Net Assets in two parts. First, since PHA will distribute all asset and liability accounts between the AMPs and Departments. The net amount for all assets and liabilities, excluding fixed assets, moved to the PHA Managed AMPs will be offset with a corresponding establishment of unrestricted net assets. A corresponding movement of Unrestricted Net Assets will offset any asset or liability movement. Secondly, PHA has prepared a calculation for the distribution of working capital. The working capital (cash available) will be distributed to the Indirect Cost Departments for six months of allocated overhead, than the remaining amount will be distributed to the PHA Managed AMPs. (APPENDIX 5) The working capital will be established as the cash starting point for each of the AMPs as of April 1, 2008, the beginning of PHA's fiscal year. PHA will setup the cash accounts on the ledger for each of the PHA Managed AMPs.

PAPMC/AME Managed AMPs will not be included in the LIPH (Fund 001) financial statements. Invested in capital assets are included in the PHA Audited financial statements as a discretely presented component unit. PAPMC/AME Managed AMPs will not be included in the LIPH (Fund 001) financial statements. Unrestricted net assets are included in the PHA Audited financial statements as a discretely presented component unit.

III. Revenues

F. Tenant Revenues

1. PHA Managed AMPs

Tenant Revenues will be directly charged to the appropriate AMP.

2. PAPMC/AME Managed AMPs

PAPMC/AME Managed AMPs will not be included in the LIPH (Fund 001) financial statements. Tenant revenue is included in the PHA Audited financial statements as a discretely presented component unit.

B. Direct Revenues

Direct revenues include tenant fees and service charges that can be identified and charged to a specific site.

1. PHA Managed AMPs

PHA currently records all direct revenues to the proper PHA Managed AMP. PHA currently records all tenant charges and any direct revenue to the proper PHA Managed AMP. PHA's account structure includes the program code (AMP number) and the

appropriate department code, which enables PHA to charge the revenues to the proper PHA Managed AMPs.

PHA's systems and procedures related to direct revenues currently in application are in compliance with asset based accounting. PHA's systems and procedures will require no transition period or transition procedures to comply with asset based accounting requirements of presenting all direct revenues under the proper AMP.

2. PAPMC/AME Managed AMPs

PAPMC/AME Managed AMPs will not be included in the LIPH (Fund 001) financial statements. Direct revenues are included in the PHA Audited financial statements as a discretely presented component unit.

C. Indirect Revenues

Indirect revenues are other income items that cannot be identified or charged to a specific AMP or to the Indirect Cost Departments. Indirect revenues will be allocated between the PHA Managed AMPs based on the percentage of units available. PHA will review the treatment of these liabilities on an annual basis to confirm that its treatment is appropriate.

D. HUD Operating Subsidy

3. PAPMC / AME Manage AMPs

The Operating Subsidy paid to the PAPMC / AME Managed AMPs will continue to be based on the amount agreed to in the R & O agreement. The Operating Subsidy amount actually paid to the PAPMC / AME Managed AMPs will be presented as an operating subsidy revenue and direct expense under the appropriate AMP.

4. PHA Managed AMPs

For PHA's project based accounting purposes, Operating Subsidy is considered an indirect revenue source. PHA's Operating Subsidy is provided in one block as if PHA were one AMP. The funding for all AMPs is calculated using the same Allowable Expense Level per PHA's MTW agreement. Since the basis of the funding calculation is the same across all AMPs, PHA considers Operating Subsidy an indirect revenue source. For all PAPMC and AME Managed AMPs, the amount of subsidy revenue allocated to these sites will be based on the R & O agreements.

The remaining Operating Subsidy will be allocated to the PHA Managed AMPs based on the number of units available. In order to accomplish the allocation of Operating Subsidy revenue,

PHA will need to create an automated process in its accounting system to create three allocations that will distribute the Operating Subsidy. First, Operating Subsidy will need to be distributed into two parts, one part to the PAPMC and AME Managed AMPs and

one part to the PHA Managed AMPs. After the two parts are created, each of the sub parts will be distributed respectively. PHA's accounting system has the capabilities to perform these calculations. PHA needs to define the calculations in order for the automated process to be completed and to comply with the project based accounting requirements. PHA will examine the financial needs of each of the PHA Managed AMPs using its financial statements to determine that the HUD Operating Subsidy allocated to PHA Managed AMPs is sufficient for the AMP's financial needs.

E. Operating Transfers from the MTW Block (Excess HAP) & CFP

5. PHA Managed AMPs

PHA has included in its MTW annual plan Operating Transfers from the MTW Program and the CFP Program into the Public Housing Program to offset operating expenses. PHA has determined that the appropriate treatment of Operating Transfers at the current time will be to allocate the Operating Transfers to all PHA Managed AMPs based on the number of available units. PHA will establish separate account numbers for the MTW and CFP Operating Transfers. The Operating Transfers are made to assist the PHA Managed AMPs with its operations. PHA may need to adjust the allocation of the Operating Transfers in fiscal years to assist the operating needs of one AMP over another AMP that may not need the assistance. PHA's MTW agreement with HUD permits the PHA flexibility to move funds between its Public Housing, Section 8 HCV, and CFP programs. PHA will reserve the right to adjust the allocations of the Operating Transfers to meet the financial needs of all of the PHA Managed AMPs.

6. PAPMC / AME Managed AMPs

Operating Transfers will not be allocated to the PAPMC / AME Managed AMPs.

IV. Expenses

F. Direct Expenses

7. PHA Managed AMPs

PHA currently records all direct expenses to the proper AMP. PHA's procurement and accounts payables processes include assigning the proper chart fields or account structure. PHA's account structure includes the program code (AMP number) and the appropriate department code.

For payroll, PHA directly charges all payroll costs using account labels. Account labels are used to tell PHA's accounting system where to directly charge an employee's payroll costs. PHA can setup as many account labels as needed to have payroll costs charged to the proper program, department, AMP, etc. based on PHA's requirements. PHA's accounting system gives the Authority the automated ability to charge payroll costs from the employee timesheets to the proper account. When employees complete their weekly

timesheets, the employees report all hours to account labels. The timesheets allow employees to charge as many account labels as needed during the week. Employees submit their timesheets to their direct supervisor for approval. The direct supervisor verifies that the correct account labels.

PHA's systems and procedures related to direct expenses currently in application are in compliance with asset based accounting. PHA's systems and procedures will require no transition period or transition procedures to comply with asset based accounting requirements of presenting all direct revenues and expenses under the proper AMP.

8. PAPMC/AME Managed AMPs

The only PAPMC/AME Managed AMPs direct expenses that will be included in the LIPH (Fund 001) financial statements are PHA's payment of Operating Subsidies. All other direct expenses are included in the PHA Audited financial statements as a discretely presented component unit.

G. Corporate Legal

PHA has diverse legal issues due to the size of its programs. PHA will analyze legal expenses to determine the appropriate treatment of the legal expenditures. The treatments of the legal expenses are as follows:

9. Direct Legal Expenses

Legal expenses that can be identified as a direct cost to a specific AMP will be charged to that AMP.

10. Indirect Legal Expenses for the Benefit of PHA Managed AMPs

Indirect legal expenses that cannot be defined as costs for a specific AMP, but can be identified as providing benefits to the PHA Managed AMPs will be prorated across all AMPs.

11. Indirect Legal Expenses to Support MTW Objectives

Indirect legal expenses that cannot be defined as costs for a specific AMP, and cannot be identified as providing benefits to the PHA Managed AMPs will be considered legal expenses to support the MTW objectives. The legal expenses will be charged to the Indirect Cost Departments. PHA will utilize interest income and MTW transfers to offset these expenses.

H. Maintenance Expenses

12. Payroll Expenses

PHA currently directly charges all maintenance payroll costs to the direct PHA Managed AMP. PHA directly charges all payroll costs using account labels.

Account labels are used to tell PHA's accounting system where to directly charge a maintenance employee's payroll costs. PHA can setup as many account labels as needed to have payroll costs charged to the proper PHA Managed AMP. PHA's accounting system gives the Authority the automated ability to charge maintenance payroll costs from the employee timesheets to the proper account. When maintenance employees complete their weekly timesheets, the employees report all hours to account labels. The timesheets allow maintenance employees to charge as many account labels as needed during the week. Maintenance employees submit their timesheets to their direct supervisor for approval. The direct supervisor verifies that the correct account labels.

13. Materials and Contract Costs

PHA currently records all maintenance materials and contract costs directly to the proper PHA Managed AMP. PHA's procurement and accounts payables processes include assigning the proper chart fields or account structure. PHA's account structure includes the program code (AMP number) and the appropriate department code.

PHA's systems and procedures related to maintenance materials and contract costs currently in application are in compliance with asset based accounting. PHA's systems and procedures will require no transition period or transition procedures to comply with asset based accounting requirements of presenting all direct revenues and expenses under the proper AMP.

I. Indirect Expenses

14. PHA Managed AMPs

PHA will be using an allocation to charge overhead from the Indirect Cost Departments to the AMPs. The Indirect Cost Departments expenditures will be allocated to all PHA Managed AMPs. (APPENDIX 3) PHA will create an account number for the overhead allocation. The overhead allocation account will always have a credit balance under the Indirect Cost Departments to offset the expenses allocated to the AMPs. PHA will have the ability to print reports that present the total revenues and operating expenses of the Indirect Cost Departments and show the overhead allocation amount as a contra to the operating expenses.

PHA anticipates establishing approximately 20 to 30 different allocation tables or allocation possibilities. Allocations will be based on many different criteria including but not limited to units, bedrooms, and number of employees. PHA will review each cost department, Indirect Cost and Frontline, to determine the appropriate allocation for the each department. PHA will review all of its allocations on an annual basis to determine if each of the PHA Managed AMPs is charged the proper amount of expenses. The review of the allocations will examine the financial affects of the

allocations to each of the AMPs. PHA will reserve the right to adjust allocations as needed to assist the financial solvency of all of the PHA Managed AMPs.

PHA will need to implement the following accounting system updates in order to comply with the project-based requirements. PHA anticipates completing the accounting system updates by March 31, 2009:

- Establish 20 to 30 different allocations
- Assign an allocation method to each of the Indirect Cost Departments
- Setup accounts for Indirect Cost allocation expense
- Create reporting tools for printing reports for all departments and AMPs

15. PAPMC / AME Managed AMPs

The Indirect Cost Departments expenditures will not be normally allocated to PAPMC / AME Managed AMPs. If expenditures are determined to benefit the PAPMC / AME Managed AMPs, those expenditures will be directly charged to the appropriate PAPMC / AME Managed AMPs.

J. Frontline Expenses

16. PHA Managed AMPs

PHA has certain frontline expenses that will be provided centrally since this is the most cost-effective way to provide these services. These services are provided to PHA Managed AMPs only. The prorating of expenses to the AMPs will be determined on a department-by-department basis, so that the AMPs receiving services from the department are charged an appropriate percentage of the department expenses (APPENDIX 2). Frontline expenses will be charged to the appropriate expense accounts for the AMPs.

PHA anticipates establishing approximately 20 to 30 different allocation tables or allocation possibilities. Allocations will be based on many different criteria including but not limited to units, bedrooms, and number of employees. PHA will review each of the Frontline Expense to determine the appropriate allocation for the each department. PHA will review all of its allocations on an annual basis to determine if each of the PHA Managed AMPs is charged the proper amount of expenses. The review of the allocations will examine the financial affects of the allocations to each of the AMPs. PHA will reserve the right to adjust allocations as needed to assist the financial solvency of all of the PHA Managed AMPs.

PHA will need to implement the following accounting system updates in order to comply with the project-based requirements. PHA anticipates completing the accounting system updates by March 31, 2009:

- Establish 20 to 30 different allocations
- Assign an allocation method to each of the Frontline Expense Departments
- Create reporting tools for printing reports for all departments and AMPs

17. PAPMC / AME Managed AMPs

The Indirect Cost Departments expenditures will not be normally allocated to PAPMC / AME Managed AMPs. If expenditures are determined to benefit the PAPMC / AME Managed AMPs, those expenditures will be directly charged to the appropriate PAPMC / AME Managed AMPs.

V. Capital Fund Program

PHA will apply all expenditures under the Capital Fund program to three areas, PHA Managed AMPs, PAPMC / AME Managed AMPs, and Capital Projects. Under PHA's MTW agreement, PHA is permitted flexibility with the expenditures of Capital Funds. Some of the expenditures that PHA will not be able to apply all expenditures made under the Capital Fund Program to a specific PHA Managed AMP or PAPMC / AME Managed AMP. PHA will create a separate category to charge these expenditures, Capital Projects.

Although PHA is an MTW agency and is not required to, PHA reports and tracks all CFP expenditures based on the CFP Budget Line Items. PHA has determined this method to be accurate and efficient method to track CFP expenditures.

K. 1406 Expenditures

1406 expenditures will be prorated across all PHA Managed AMPs. PHA has included in its annual plan Operating Transfers from the CFP Program into the Public Housing Program to offset operating expenses. PHA has determined that the appropriate treatment of Operating Transfers at the current time will be to allocate the Operating Transfers to all PHA Managed AMPs based on the number of available units. PHA will establish an account number for the CFP Operating Transfers. The Operating Transfers are made to assist the PHA Managed AMPs with its operations. PHA may need to adjust the allocation of the Operating Transfers in fiscal years to assist the operating needs of one AMP over another AMP that may not need the assistance. PHA will reserve the right to adjust the allocations of the Operating Transfers to meet the financial needs of all of the PHA Managed AMPs. PHA will not present expenditures for the CFP under the Capital Projects cost department for BLI 1406.

L. 1408 / 1410 / 1430 Expenditures

PHA utilizes CFP Grant Funds in many different ways to support PHA's MTW objectives. PHA will analyze grant expenditures in these three Budget Line Items (BLIs) to determine the appropriate treatment of the expenditures. The three treatments are as follows:

18. Direct Expenditures

Expenditures that can be identified as a direct cost to a specific AMP will be charged to that AMP.

19. Indirect Expenditures for the Benefit of PHA Managed AMPs

Indirect costs that cannot be defined as expenditures for a specific AMP, but can be identified as providing benefits to the PHA Managed AMPs will be prorated across all AMPs. This would include expenditures in the 1410 BLI. PHA utilizes 10% of each year's annual award to charge an allocated percentage of administrative salaries and benefits per PHA's OMB circular A-133 compliant Indirect Cost Allocation Plan. PHA will continue to allocate administrative salaries and benefits to this BLI; however, at this time the expenditures will be prorated across all the PHA Managed AMPs. PHA will review these expenditures on an annual basis to determine if any adjustments to the allocation are required.

20. Indirect Expenditures to Support Capital Projects

Indirect costs that cannot be defined as expenditures for a specific AMP, and cannot be identified as providing benefits to the PHA Managed AMPs will be considered expenditures to support the Capital Projects. Some CFP expenditures that are included in this area would include Staff Training, Software Improvements and Database Management, and Pre-apprenticeship Job Training Programs.

M. 1501 Expenditures

1501 expenditures are related to the repayment and interest on Construction Bonds that were approved by HUD in prior fiscal years. PHA received 4 series of bonds. HUD repays the bonds and interest on different schedules for each of bonds on a semi-annual basis. PHA utilized the proceeds of the Construction Bonds for the benefit of several different PHA Managed AMPs, for Homeownership units that have been sold, and for PAPMC / AME Managed AMPs. PHA also utilized the interest earned on the proceeds for the benefit of construction projects. PHA will not be able to identify which specific PHA Managed AMP or PAPMC / AME Managed AMPs to charge the annual payments of principle and interest. PHA plans to charge the expenditures to the Capital Projects category.

N. All Other CFP BLIs

PHA currently charges most of the grant expenditures under BLIs 1440 to 1499 to a specific PHA Managed AMP or PAPMC / AME Managed AMP. As with the other Capital Fund Program BLIs, there will be some expenditures made that PHA will not be able to charge to a specific PHA Managed AMP or PAPMC / AME Managed AMP. In these few cases, PHA will charge the expenditures to the Capital Projects category.

O. Project Based Budgeting

PHA currently prepares project based operating budgets and operating budgets for all of the departments. PHA adds all of the budgets to the Automated Accounting System. The operating budgets are currently used in the procurement and accounts payable process. The operating budgets are consolidated for the purposes of preparing PHA's monthly financial statements. PHA needs to add to the operating budgets for each of the projects and departments budget amounts for the Indirect Cost and Frontline Expense Departments allocation account. PHA's operating budget process is currently in compliance with the HUD Project Based Budgeting requirements.

When PHA has prepared its Capital Fund Program Budgets, PHA determines specific capital work items that need to be completed at all or some of PHA sites. PHA does not establish a Capital Budget by site, but by work item. Then once PHA determines which sites PHA will perform the work item, PHA reclassifies the budget amount from a PHA Wide work item to the specific site. PHA will continue this process; however, the budget will be established at the Capital Projects category rather than PHA Wide.

APPENDIX 1

PHA MANAGED SITES			PAPMC / AME MANAGED SITES		
PROJECT NUMBER	PROJECT NAME	UNITS	PROJECT NUMBER	PROJECT NAME	UNITS
PA2-001	Johnson	525	PA2-053	Southwark	470
PA2-003	Allen	150	PA2-123	Ludlow SS	75
PA2-010	Rosen	506	PA2-126	"8 Diamonds"	152
PA2-013	Wilson	723	PA2-127	Spring Garden	86
PA2-014	Norris	322	PA2-128	New MLK	49
PA2-015	Harrison	299	PA2-129	Cambridge II	40
PA2-018	Arch	73	PA2-130	New Schuylkill	135
PA2-020	Spring Garden	202	PA2-131	St. Anthony	38
PA2-023	Liddonfield	270	PA2-132	Suffolk	137
PA2-024	Queen Lane	138	PA2-133	Allen 'Off-site'	178
PA2-029	Hill Creek	331	PA2-136	MLK	45
PA2-030	Abbottsford	235	PA2-137	Cambridge	44
PA2-031	Bartram	490	PA2-138	Mt. Olivet	161
PA2-032	Oxford	199	PA2-139	Tasker	245
PA2-034	Whitehall	248	PA2-143	Tasker II	184
PA2-035	Haddington	147	PA2-145	Lucien E Blackwell	80
PA2-039	Westpark	322	PA2-146	St. Ignatius	67
PA2-042	Champlost	102	PA2-147	Cambridge III	40
PA2-046	Haverford	24	PA2-148	Neuman North	67
PA2-049	Morton	248	PA2-149	MLK 4	42
PA2-050	Blumberg	497	PA2-150	LEB II	80
PA2-054	Parkview	20	PA2-152	Germantown House	133
PA2-055	Fairhill	263	PA2-153	LEB III	50
PA2-061	Paschall	218	PA2-156	Marshal Shepard	80
PA2-062	Pt. Breeze	71	PA2-158	Nellie Reynolds	64
PA2-063	Jackson	56	PA2-159	Angela Court II	54
PA2-065	Collegeview	54			
PA2-066	Holmecrest	84			
PA2-076	Emlen	155			
PA2-077	Bentley	95			
PA2-093	Westpark Plz	65			
PA2-100	Moore	29			
PA2-104	Arlene	32			
PA2-114	Jacobs	79			
PA2-117	Rosen Infill	45			
PA2-901	Scat. Sites	436			
PA2-902	Scat. Sites	360			
PA2-903	Scat. Sites	529			
PA2-904	Scat. Sites	376			
PA2-905	Scat. Sites	442			
PA2-906	Scat. Sites	461			
PA2-907	Scat. Sites	418			
PA2-908	Scat. Sites	419			
PA2-909	Scat. Sites	421			
PA2-910	Scat. Sites	332			
Total		11,511			2,796

APPENDIX 2

FRONTLINE DEPARTMENTS AND PRORATION METHODS

Department ID	Department Description	Proration Method
404404	Special Operations	Unit Percentage of PHA Managed AMPs Only
405405	Environmental Services	Unit Percentage of PHA Managed AMPs Only
406406	Inspections	Unit Percentage of PHA Managed AMPs Only
407407	Safety Office	Unit Percentage of PHA Managed AMPs Only
427427	Family Self Sufficiency	Unit Percentage of PHA Managed AMPs Only
441441	Public Housing Admissions	Unit Percentage of PHA Managed AMPs Only
442442	Public Housing Leasing	Unit Percentage of PHA Managed AMPs Only
455455	Conventional Sites Specialty Crews	Unit Percentage of PHA Managed AMPs Only
456456	Combustion	Unit Percentage of PHA Managed AMPs Only
462462	Force Account Programs	Unit Percentage of PHA Managed AMPs Only
463463	Work Order Center	Unit Percentage of PHA Managed AMPs Only
464464	Vector Control	Unit Percentage of PHA Managed AMPs Only
467467	Provisional Roofing	Unit Percentage of PHA Managed AMPs Only
468468	Roofing Inspections	Unit Percentage of PHA Managed AMPs Only
470470	Primary Electric	Unit Percentage of PHA Managed AMPs Only
471471	Elevators	Unit Percentage of PHA Managed AMPs Only
472472	Lock Shop	Unit Percentage of PHA Managed AMPs Only
473473	Specialty Plumbing	Unit Percentage of PHA Managed AMPs Only
494494	Fleet Management	Unit Percentage of PHA Managed AMPs Only
496496	Risk Management Insurance	Unit Percentage of PHA Managed AMPs Only
512512	Lease Enforcement/Compliance	Unit Percentage of PHA Managed AMPs Only
601601	Call Center	Unit Percentage of PHA Managed AMPs Only
651651	Customer Support Services	Unit Percentage of PHA Managed AMPs Only
602602	Events	Unit Percentage of PHA Managed AMPs Only
709712	End User Support Services	Unit Percentage of PHA Managed AMPs Only
440440	Office, General Manager, Scattered Sites Mgmt	Unit Percentage of Scattered Sites AMPs Only
450450	Office, General Manager, Conv. Sites Mgt & Maint.	Unit Percentage of Conventional AMPs Only
460460	Office, GM, Scattered Sites Maint.	Unit Percentage of Scattered Sites AMPs Only
431431/451451	North Area Management	Unit Percentage of North Region AMPs Only
432432/452452	Northeast Area Management	Unit Percentage of Northeast Region AMPs Only
433433/453453	South Area Management	Unit Percentage of South Region AMPs Only
434434/454454	West Area Management	Unit Percentage of West Region AMPs Only
438438/458458	North Central Area Management	Unit Percentage of North Central Region AMPs Only
431431/451451	North Area Vacancy Crew	Unit Percentage of North Region AMPs Only
432432/452452	Northeast Area Vacancy Crew	Unit Percentage of Northeast Region AMPs Only
433433/453453	South Area Vacancy Crew	Unit Percentage of South Region AMPs Only
434434/454454	West Area Vacancy Crew	Unit Percentage of West Region AMPs Only
438438/458458	North Central Area Vacancy Crew	Unit Percentage of North Central Region AMPs Only
490490-493493	PHA Police	Unit Percentage of PHA Managed AMPs Only

APPENDIX 2 (CONTINUED)

PHA FRONTLINE PRORATION RATE CALCULATIONS

Project Number	Project Name	Units	Percentage
PA2-001	Johnson	525	4.5610%
PA2-003	Allen	150	1.3030%
PA2-010	Rosen	506	4.3960%
PA2-013	Wilson	723	6.2810%
PA2-014	Norris	322	2.7970%
PA2-015	Harrison	299	2.5980%
PA2-018	Arch	73	0.6340%
PA2-020	Spring Garden	202	1.7550%
PA2-023	Liddonfield	270	2.3460%
PA2-024	Queen Lane	138	1.1990%
PA2-029	Hill Creek	331	2.8760%
PA2-030	Abbotsford	235	2.0420%
PA2-031	Bartram	490	4.2570%
PA2-032	Oxford	199	1.7290%
PA2-034	Whitehall	248	2.1540%
PA2-035	Haddington	147	1.2770%
PA2-039	Westpark	322	2.7970%
PA2-042	Champlost	102	0.8860%
PA2-046	Haverford	24	0.2080%
PA2-049	Morton	248	2.1540%
PA2-050	Blumberg	497	4.3180%
PA2-054	Parkview	20	0.1740%
PA2-055	Fairhill	263	2.2850%
PA2-061	Paschall	218	1.8940%
PA2-062	Pt. Breeze	71	0.6170%
PA2-063	Jackson	56	0.4860%
PA2-065	Collegeview	54	0.4690%
PA2-066	Holmecrest	84	0.7300%
PA2-076	Emlen	155	1.3470%
PA2-077	Bentley	95	0.8250%
PA2-093	Westpark Plz	65	0.5650%
PA2-100	Moore	29	0.2520%
PA2-104	Arlene	32	0.2780%
PA2-114	Jacobs	79	0.6860%
PA2-117	Rosen Infill	45	0.3910%
PA2-901	Scat. Sites	436	3.7880%
PA2-902	Scat. Sites	360	3.1270%
PA2-903	Scat. Sites	529	4.5960%
PA2-904	Scat. Sites	376	3.2660%
PA2-905	Scat. Sites	442	3.8400%
PA2-906	Scat. Sites	461	4.0050%
PA2-907	Scat. Sites	418	3.6310%
PA2-908	Scat. Sites	419	3.6400%
PA2-909	Scat. Sites	421	3.6570%
PA2-910	Scat. Sites	332	2.8840%
PHA Managed AMPs Only Total		11,511	100.00%

APPENDIX 2 (CONTINUED)

PHA FRONTLINE PRORATION RATE CALCULATIONS

Project Number	Project Name	Units	Percentage
<u>Germantown Region</u>			
PA2-024	Queen Lane	138	15.718%
PA2-030	Abbotsford	235	26.765%
PA2-042	Champlost	102	11.617%
PA2-049	Morton	248	28.246%
PA2-076	Emlen	155	17.654%
Germantown Region Total		878	100.000%
<u>North Central Region</u>			
PA2-001	Johnson	525	31.475%
PA2-010	Rosen	506	30.336%
PA2-050	Blumberg	497	29.796%
PA2-077	Bentley	95	5.695%
PA2-117	Rosen Infill	45	2.698%
North Central Region Total		1,668	100.000%
<u>Northeast Region</u>			
PA2-023	Liddonfield	270	23.852%
PA2-029	Hill Creek	331	29.240%
PA2-032	Oxford	199	17.580%
PA2-034	Whitehall	248	21.908%
PA2-066	Holmecrest	84	7.421%
Northeast Region Total		1,132	100.000%
<u>North Region</u>			
PA2-003	Allen	150	11.407%
PA2-014	Norris	322	24.487%
PA2-015	Harrison	299	22.738%
PA2-020	Spring Garden	202	15.361%
PA2-055	Fairhill	263	20.000%
PA2-114	Jacobs	79	6.008%
North Region Total		1,315	100.000%
<u>South Region</u>			
PA2-013	Wilson	723	44.547%
PA2-031	Bartram	490	30.191%
PA2-061	Paschall	218	13.432%
PA2-062	Pt. Breeze	71	4.375%
PA2-063	Jackson	56	3.450%
PA2-093	Westpark Plz	65	4.005%
South Region Total		1,623	100.000%

APPENDIX 2 (CONTINUED)

PHA FRONTLINE PRORATION RATE CALCULATIONS

Project Number	Project Name	Units	Percentage
<u>West Region</u>			
PA2-018	Arch	73	12.898%
PA2-035	Haddington	147	25.972%
PA2-039	Westpark	322	56.891%
PA2-046	Haverford	24	4.240%
West Region Total		566	100.000%
<u>Scattered Sites</u>			
PA2-054	Parkview	20	0.462%
PA2-065	Collegeview	54	1.247%
PA2-100	Moore	29	0.670%
PA2-104	Arlene	32	0.739%
PA2-901	Scat. Sites	436	10.072%
PA2-902	Scat. Sites	360	8.316%
PA2-903	Scat. Sites	529	12.220%
PA2-904	Scat. Sites	376	8.686%
PA2-905	Scat. Sites	442	10.210%
PA2-906	Scat. Sites	461	10.649%
PA2-907	Scat. Sites	418	9.656%
PA2-908	Scat. Sites	419	9.679%
PA2-909	Scat. Sites	421	9.725%
PA2-910	Scat. Sites	332	7.669%
Scattered Sites Total		4,329	100.000%

APPENDIX 2 (CONTINUED)

PHA FRONTLINE PRORATION RATE CALCULATIONS

Project Number	Project Name	Units	Percentage
<u>Conventional Sites</u>			
PA2-001	Johnson	525	7.3100%
PA2-003	Allen	150	2.0890%
PA2-010	Rosen	506	7.0450%
PA2-013	Wilson	723	10.0670%
PA2-014	Norris	322	4.4830%
PA2-015	Harrison	299	4.1630%
PA2-018	Arch	73	1.0160%
PA2-020	Spring Garden	202	2.8130%
PA2-023	Liddonfield	270	3.7590%
PA2-024	Queen Lane	138	1.9210%
PA2-029	Hill Creek	331	4.6090%
PA2-030	Abbottsford	235	3.2720%
PA2-031	Bartram	490	6.8230%
PA2-032	Oxford	199	2.7710%
PA2-034	Whitehall	248	3.4530%
PA2-035	Haddington	147	2.0470%
PA2-039	Westpark	322	4.4830%
PA2-042	Champlost	102	1.4200%
PA2-046	Haverford	24	0.3340%
PA2-049	Morton	248	3.4530%
PA2-050	Blumberg	497	6.9200%
PA2-055	Fairhill	263	3.6620%
PA2-061	Paschall	218	3.0350%
PA2-062	Pt. Breeze	71	0.9890%
PA2-063	Jackson	56	0.7800%
PA2-066	Holmecrest	84	1.1700%
PA2-076	Emlen	155	2.1580%
PA2-077	Bentley	95	1.3230%
PA2-093	Westpark Plz	65	0.9050%
PA2-114	Jacobs	79	1.1000%
PA2-117	Rosen Infill	45	0.6270%
Conventional Sites Total		7,182	100.00%

APPENDIX 3

INDIRECT COST DEPARTMENTS OVERHEAD ALLOCATION RATE

Project Number	Project Name	Units	Percentage
PA2-001	Johnson	525	4.5610%
PA2-003	Allen	150	1.3030%
PA2-010	Rosen	506	4.3960%
PA2-013	Wilson	723	6.2810%
PA2-014	Norris	322	2.7970%
PA2-015	Harrison	299	2.5980%
PA2-018	Arch	73	0.6340%
PA2-020	Spring Garden	202	1.7550%
PA2-023	Liddonfield	270	2.3460%
PA2-024	Queen Lane	138	1.1990%
PA2-029	Hill Creek	331	2.8760%
PA2-030	Abbottsford	235	2.0420%
PA2-031	Bartram	490	4.2570%
PA2-032	Oxford	199	1.7290%
PA2-034	Whitehall	248	2.1540%
PA2-035	Haddington	147	1.2770%
PA2-039	Westpark	322	2.7970%
PA2-042	Champlost	102	0.8860%
PA2-046	Haverford	24	0.2080%
PA2-049	Morton	248	2.1540%
PA2-050	Blumberg	497	4.3180%
PA2-054	Parkview	20	0.1740%
PA2-055	Fairhill	263	2.2850%
PA2-061	Paschall	218	1.8940%
PA2-062	Pt. Breeze	71	0.6170%
PA2-063	Jackson	56	0.4860%
PA2-065	Collegeview	54	0.4690%
PA2-066	Holmcrest	84	0.7300%
PA2-076	Emlen	155	1.3470%
PA2-077	Bentley	95	0.8250%
PA2-093	Westpark Plz	65	0.5650%
PA2-100	Moore	29	0.2520%
PA2-104	Arlene	32	0.2780%
PA2-114	Jacobs	79	0.6860%
PA2-117	Rosen Infill	45	0.3910%
PA2-901	Scat. Sites	436	3.7880%
PA2-902	Scat. Sites	360	3.1270%
PA2-903	Scat. Sites	529	4.5960%
PA2-904	Scat. Sites	376	3.2660%
PA2-905	Scat. Sites	442	3.8400%
PA2-906	Scat. Sites	461	4.0050%
PA2-907	Scat. Sites	418	3.6310%
PA2-908	Scat. Sites	419	3.6400%
PA2-909	Scat. Sites	421	3.6570%
PA2-910	Scat. Sites	332	2.8840%
Total		11,511	100.00%

APPENDIX 3 (CONTINUED)

INDIRECT COST DEPARTMENTS

Department ID	Department Description
100100	Office, Executive Director
110110	Office, Senior Deputy Executive Director
200200	Office, Inspector General
338338	Office, Assistant Executive Director, Supply Chain Mgmt
339339	Contracts Administration
340340	Contracts & Procurement
341341	Affirmative Action
342342	Purchasing
343343	Office Services
400400	Office, AED for Operations
401401	Office, Executive General Manager
496496	Risk Management
500500	Office, General Manager Human Resources
501501	Recruitment & Replacement
502502	Compensation & Benefits
503503	Labor/Employment Relations
504504	Student Interns
505505	Technical Aides
507507	Temporary Personnel
508508	Payroll
510510	Corporate Legal
511511	Real Estate Investment
521521	Strategic Management
522522	Organizational Development
523523	Quality Assurance
600600	Communications
630630	Program Compliance
700700	Office, Assistant Executive Director, Finance
701701	Finance
707707	Budget
709709	Office, Chief Information Officer, ISM
709711	Enterprise Systems
709714	ISM Financial Information Systems
800800	Office, Assistant Executive Director, Real Estate Services
810811	Program Management
810812	Program Development
810813	Policy
344344-344345	Inventory - Warehouses

APPENDIX B

Annual Statement/Performance and Evaluation Report

Capital Fund Program (CFP) Part I: Summary

PHA Name: PHILADELPHIA HOUSING AUTHORITY	Grant Type and Number Capital Fund Program Grant No: PA26P00250110	Federal FY of Grant: 2010
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- Original Annual Statement Reserve for Disasters/Emergencies
 Performance and Evaluation Report for Program Year Ending:
- Revised Annual Statement (Revision No:)
 Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost			
		Original	Revised	Revised	Revised
1	Total Non-CFP Funds				
2	1406 Operations	10,000,000	0	0	0
3	1408 Management Improvements	5,490,000	0	0	0
4	1410 Administrative Costs	5,800,000	0	0	0
5	1411 Audit	0	0	0	0
6	1415 Liquidated Damages	0	0	0	0
7	1430 Fees and Costs	2,600,000	0	0	0
8	1440 Site Acquisition	100,000	0	0	0
9	1450 Site Improvements	3,423,000	0	0	0
10	1460 Dwelling Structures	14,750,000	0	0	0
11	1465.1 Dwelling Equipment-Nonexpendable	0	0	0	0
12	1470 Non-Dwelling Space	2,500,000	0	0	0
13	1475 Non-Dwelling Equipment	1,205,000	0	0	0
14	1485 Demolition	300,000	0	0	0
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495 Relocation	200,000	0	0	0
18	1499 Development Activities	500,000	0	0	0
19	1501 Collateralization or Debt Service	11,899,425	0	0	0
20	1502 Contingency				
21	Amount of Annual Grant (Sum of lines 2-20)	58,767,425	0	0	0
22	Amount of Line 21 Related to LBP Activities				
23	Amount of Line 21 Related to Section 504 Compliance	1,500,000			
24	Amount of Line 21 Related to Security - Soft Costs				
25	Amount of Line 21 Related to Security - Hard Costs				
26	Amount of Line 21 Related to Energy Conservation Measures				

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Capital Fund Program (CFP)

Part II: Supporting Pages

PHA Name:		Grant Type and Number								
Philadelphia Housing Authority		Capital Fund Program Grant No: PA26P00250110						2010		
Development Number / Name Activities	HA-Wide	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost		Revised	Revised	Comments
						Original	Revised			
000	PHA-Wide	701100	Operating Subsidy	1406		10,000,000				
			Total Operating Subsidy Cost			10,000,000				
			<u>Management Improvements</u>							
000	PHA-Wide	700787	Lobby Monitors: Program to enhance site security.	1408		800,000				
000	PHA-Wide	700169	Police Officers Salaries and Benefits	1408		2,500,000				
000	PHA-Wide	700368	Apprenticeship Program Field Training	1408		1,000,000				
000	PHA-Wide	700176	Computer Software Acquisition, Customization, Installation and Program Implementation Training	1408		1,000,000				
000	PHA-Wide	700168	PHA Development Staff Manager	1408		115,000				
000	PHA-Wide	700796	Staff Development: Provide training opportunities for PHA staff.	1408		75,000				
			Total Management Improvement Cost			5,490,000				
			<u>Administrative Costs</u>							
000	PHA-Wide	700183	Administrative Salaries and Benefits	1410		5,800,000				
			Total Administrative Cost	1410		5,800,000				
			<u>Fees and Costs</u>							
000	PHA-Wide	700187	Master Planning	1430		100,000				
000	PHA-Wide	700185	A&E, Legal and Consultant Services	1430		2,000,000				
000	PHA-Wide	700855	Environmental Issues: LBP Testing and Asbestos Monitoring	1430		500,000				
			Total Professional Services Costs and Fees			2,600,000				
			<u>Site Acquisition</u>							
000	PHA-Wide	700165	Acquire properties below TDC	1440		100,000				
			Total Site Acquisition Costs			100,000				
			<u>PHA- Wide Site Improvements</u>							
000	PHA-Wide	700876	Install Back Flow Preventors	1450	4 sites	50,000				
000	PHA-Wide	701423	Repair / Replace Exterior Plumbing Lines	1450	22,125 lf	150,000				
000	PHA-Wide	700992	Landscaping including Tree Trimming/Tree Removal	1450	Varies	100,000				
	PHA-Wide	701097	Asphalt/Paving	1450	40,000 cy	100,000				
000	PHA-Wide	701099	Concrete	1450	200,000 cy	500,000				

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Capital Fund Program (CFP)

Part II: Supporting Pages

PHA Name:		Grant Type and Number								
Philadelphia Housing Authority		Capital Fund Program Grant No: PA26P00250110						2010		
Development Number / Name Activities	HA-Wide	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost		Revised	Revised	Comments
						Original	Revised			
000	PHA-Wide	701478	Fencing	1450	Varies	75,000				
000	PHA-Wide	700174	504 Exterior Improvements, Ramps, Exterior Glides	1450	20 Units	300,000				
000	PHA-Wide	700856	Underground Storage Tank Removal & Inspections	1450	Varies	50,000				
000	PHA-Wide	700857	PCB Removal & Disposal	1450	Varies	30,000				
000	PHA-Wide	900630	Sparkle-Signage/Awnings	1450	Varies	250,000				
000	PHA-Wide	900635	Sparkle-Lighting/Bollards	1450	Varies	50,000				
000	PHA-Wide	900640	Sparkle-Grounds/Tree Removal	1450	Varies	50,000				
000	PHA-Wide	900660	Sparkle-Iron Fencing	1450	Varies	75,000				
Total PHA-Wide Site Improvements						1,780,000				
<u>Scattered Sites Site Improvements</u>										
004	Scattered Sites	700881	Comprehensive Site Improvements. Exterior repair and replacement work as needed including, but not limited to, porches, retaining walls, walkways, siding, stucco repair, and brick repointing.	1450	33	400,000				
005	Scattered Sites	701400	Comprehensive Site Improvements. Exterior repair and replacement work as needed including, but not limited to, porches, retaining walls, walkways, siding, stucco repair, and brick repointing.	1450	3	30,000				
012	Scattered Sites	701401	Comprehensive Site Improvements. Exterior repair and replacement work as needed including, but not limited to, porches, retaining walls, walkways, siding, stucco repair, and brick repointing.	1450	25	300,000				
025	Scattered Sites	701494	Comprehensive Site Improvements. Exterior repair and replacement work as needed including, but not limited to, porches, retaining walls, walkways, siding, stucco repair, and brick repointing.	1450	2	20,000				
060	Scattered Sites	701409	Comprehensive Site Improvements. Exterior repair and replacement work as needed including, but not limited to, porches, retaining walls, walkways, siding, stucco repair, and brick repointing.	1450	4	50,000				
067	Scattered Sites	701410	Comprehensive Site Improvements. Exterior repair and replacement work as needed including, but not limited to, porches, retaining walls, walkways, siding, stucco repair, and brick repointing.	1450	0	5,000				
069	Scattered Sites	701411	Comprehensive Site Improvements. Exterior repair and replacement work as needed including, but not limited to, porches, retaining walls, walkways, siding, stucco repair, and brick repointing.	1450	17	200,000				
078	Scattered Sites	701413	Comprehensive Site Improvements. Exterior repair and replacement work as needed including, but not limited to, porches, retaining walls, walkways, siding, stucco repair, and brick repointing.	1450	1	8,000				
080	Scattered Sites	701414	Comprehensive Site Improvements. Exterior repair and replacement work as needed including, but not limited to, porches, retaining walls, walkways, siding, stucco repair, and brick repointing.	1450	5	60,000				
081	Scattered Sites	701415	Comprehensive Site Improvements. Exterior repair and replacement work as needed including, but not limited to, porches, retaining walls, walkways, siding, stucco repair, and brick repointing.	1450	8	100,000				
085	Scattered Sites	701417	Comprehensive Site Improvements. Exterior repair and replacement work as needed including, but not limited to, porches, retaining walls, walkways, siding, stucco repair, and brick repointing.	1450	17	200,000				
087	Scattered Sites	701418	Comprehensive Site Improvements. Exterior repair and replacement work as needed including, but not limited to, porches, retaining walls, walkways, siding, stucco repair, and brick repointing.	1450	1	10,000				
088	Scattered Sites	701419	Comprehensive Site Improvements. Exterior repair and replacement work as needed including, but not limited to, porches, retaining walls, walkways, siding, stucco repair, and brick repointing.	1450	8	100,000				
091	Scattered Sites	701420	Comprehensive Site Improvements. Exterior repair and replacement work as needed including, but not limited to, porches, retaining walls, walkways, siding, stucco repair, and brick repointing.	1450	8	100,000				

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Capital Fund Program (CFP)

Part II: Supporting Pages

PHA Name:		Grant Type and Number								
Philadelphia Housing Authority		Capital Fund Program Grant No: PA26P00250110						2010		
Development Number / Name Activities	HA-Wide	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost		Revised	Revised	Comments
						Original	Revised			
092	Scattered Sites	701421	Comprehensive Site Improvements: Exterior repair and replacement work as needed including, but not limited to, porches, retaining walls, walkways, siding, stucco repair, and brick repointing.	1450	5	60,000				
			Total Scattered Site Improvements		137	1,643,000				
			<u>PHA Wide Dwelling Structures</u>							
000	PHA-Wide	700179	Environmental Hazard Abatement	1460	Varies	150,000				
000	PHA-Wide	700181	Mold Remediation	1460	Varies	100,000				
000	PHA-Wide	701433	Repair Exterior Wall Surfaces including Stucco, Brick, Brick Pointing and Caulking	1460	11,000 sf	300,000				
000	PHA-Wide	700978	Window Replacement	1460	Various Sites	250,000				
000	PHA-Wide	701434	Roof Repair/Replacement	1460	250 Units	100,000				
000	PHA-Wide	701431	Vacant Conventional Unit Rehab Program: Work includes LBP abatement, kitchens, baths, floors, electrical upgrades, plumbing upgrades, heating upgrades, painting, windows and doors in conventional sites.	1460	50 Units	2,000,000				
000	PHA-Wide	701098	504 Unit Modification/Fair Housing	1460	150 Units	1,500,000				
000	PHA-Wide	701081	Flooring	1460	20,000 sf	100,000				
000	PHA-Wide	700878	Plumbing Upgrades	1460	35 Units	100,000				
000	PHA-Wide	700875	Electrical Upgrades/Distribution	1460	750 Units	400,000				
000	PHA-Wide	700874	Combustion Upgrades	1460	500	500,000				
000	PHA-Wide	701095	Heating, Ventilation and Air Conditioners (HVAC) Upgrades	1460	33 Units	100,000				
000	PHA-Wide	701165	Elevator Upgrades	1460	6-8 Elevators	800,000				
000	PHA-Wide	701089	Replace Metal Handrails and Railings	1460	Varies	50,000				
000	PHA-Wide	701090	Fire Safety Code Compliance	1460	Varies	250,000				
000	PHA-Wide	701206	Security to Support Modernization Sites/Unit Turnover	1460	Varies	100,000				
			Total PHA-Wide Dwelling Unit Improvements			6,800,000				
			<u>Scattered Sites Dwelling Unit Renovation</u>							
004	Scattered Sites	700453	Comprehensive Unit Modernization: Partial or complete interior rehab as needed including, but not limited to: kitchen and bath repair or replacement; window repair or replacement; roofing; drywall; carpentry, electrical and plumbing work; and, appliance replacement.	1460	73	5,500,000				
005	Scattered Sites	700454	Comprehensive Unit Modernization: Partial or complete interior rehab as needed including, but not limited to: kitchen and bath repair or replacement; window repair or replacement; roofing; drywall; carpentry, electrical and plumbing work; and, appliance replacement.	1460	1	75,000				
012	Scattered Sites	700455	Comprehensive Unit Modernization: Partial or complete interior rehab as needed including, but not limited to: kitchen and bath repair or replacement; window repair or replacement; roofing; drywall; carpentry, electrical and plumbing work; and, appliance replacement.	1460	4	300,000				
025	Scattered Sites	700456	Comprehensive Unit Modernization: Partial or complete interior rehab as needed including, but not limited to: kitchen and bath repair or replacement; window repair or replacement; roofing; drywall; carpentry, electrical and plumbing work; and, appliance replacement.	1460	1	75,000				

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Capital Fund Program (CFP)

Part II: Supporting Pages

PHA Name:		Grant Type and Number								
Philadelphia Housing Authority		Capital Fund Program Grant No: PA26P00250110						2010		
Development Number / Name Activities	HA-Wide	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost		Revised	Revised	Comments
						Original	Revised			
060	Scattered Sites	700457	Comprehensive Unit Modernization: Partial or complete interior rehab as needed including, but not limited to: kitchen and bath repair or replacement; window repair or replacement; roofing; drywall; carpentry, electrical and plumbing work; and, appliance replacement.	1460	1	75,000				
067	Scattered Sites	700458	Comprehensive Unit Modernization: Partial or complete interior rehab as needed including, but not limited to: kitchen and bath repair or replacement; window repair or replacement; roofing; drywall; carpentry, electrical and plumbing work; and, appliance replacement.	1460	1	75,000				
069	Scattered Sites	700459	Comprehensive Unit Modernization: Partial or complete interior rehab as needed including, but not limited to: kitchen and bath repair or replacement; window repair or replacement; roofing; drywall; carpentry, electrical and plumbing work; and, appliance replacement.	1460	9	700,000				
078	Scattered Sites	700462	Comprehensive Unit Modernization: Partial or complete interior rehab as needed including, but not limited to: kitchen and bath repair or replacement; window repair or replacement; roofing; drywall; carpentry, electrical and plumbing work; and, appliance replacement.	1460	1	75,000				
080	Scattered Sites	700460	Comprehensive Unit Modernization: Partial or complete interior rehab as needed including, but not limited to: kitchen and bath repair or replacement; window repair or replacement; roofing; drywall; carpentry, electrical and plumbing work; and, appliance replacement.	1460	2	125,000				
081	Scattered Sites	700461	Comprehensive Unit Modernization: Partial or complete interior rehab as needed including, but not limited to: kitchen and bath repair or replacement; window repair or replacement; roofing; drywall; carpentry, electrical and plumbing work; and, appliance replacement.	1460	4	300,000				
085	Scattered Sites	700463	Comprehensive Unit Modernization: Partial or complete interior rehab as needed including, but not limited to: kitchen and bath repair or replacement; window repair or replacement; roofing; drywall; carpentry, electrical and plumbing work; and, appliance replacement.	1460	3	200,000				
087	Scattered Sites	700464	Comprehensive Unit Modernization: Partial or complete interior rehab as needed including, but not limited to: kitchen and bath repair or replacement; window repair or replacement; roofing; drywall; carpentry, electrical and plumbing work; and, appliance replacement.	1460	1	75,000				
088	Scattered Sites	700465	Comprehensive Unit Modernization: Partial or complete interior rehab as needed including, but not limited to: kitchen and bath repair or replacement; window repair or replacement; roofing; drywall; carpentry, electrical and plumbing work; and, appliance replacement.	1460	3	200,000				
091	Scattered Sites	700466	Comprehensive Unit Modernization: Partial or complete interior rehab as needed including, but not limited to: kitchen and bath repair or replacement; window repair or replacement; roofing; drywall; carpentry, electrical and plumbing work; and, appliance replacement.	1460	1	100,000				
092	Scattered Sites	700467	Comprehensive Unit Modernization: Partial or complete interior rehab as needed including, but not limited to: kitchen and bath repair or replacement; window repair or replacement; roofing; drywall; carpentry, electrical and plumbing work; and, appliance replacement.	1460	1	75,000				
			Scattered Site Unit Renovation Total		106	7,950,000				
			<u>Non-Dwelling Structures</u>							
000	PHA-Wide	701486	Modernization of Non-Dwelling Space	1470		2,500,000				
			Total Non-Dwelling Structures			2,500,000				
			<u>Non-Dwelling Equipment</u>							
000	PHA-Wide	700035	Equipment for Security Upgrades	1475	5 Bldgs	200,000				
000	PHA-Wide	700614	Telephone Infrastructure Upgrades	1475	10 Sites	300,000				
000	PHA-Wide	700180	Computer Infrastructure Upgrades, Computer Lab Support, PHA Office and ISM Support Services	1475	Varies	500,000				

Annual Statement/Performance and Evaluation Report

Capital Fund Program (CFP)

Part II: Supporting Pages

PHA Name:		Grant Type and Number								
Philadelphia Housing Authority		Capital Fund Program Grant No: PA26P00250110						2010		
Development Number / Name Activities	HA-Wide	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost		Revised	Revised	Comments
						Original	Revised			
000	PHA-Wide	700798	Community Space Furniture and Equipment	1475	Varies	30,000				
000	PHA-Wide	701203	Maintenance Equipment	1475	Varies	100,000				
000	PHA-Wide	701204	Administrative and Field Office Furniture and Equipment	1475	Varies	75,000				
			Total Non-Dwelling Equipment			1,205,000				
000	PHA-Wide	700882	Demolition Costs to Remove Hazardous and/or Collapsed Buildings in Response to City Inspectors	1485	8-11 Units	300,000				
			Total Demolition			300,000				
000	PHA-Wide	700854	Relocation	1495	Varies	200,000				
			Total Relocation			200,000				
000	PHA-Wide	701490	New Development	1499	Varies	500,000				
			New Development			500,000				
000	PHA-Wide	701491	Bond Debt Service - Principle	1501		6,774,000				
000	PHA-Wide	701498	Bond Debt Service - Interest	1501		5,125,425				
			Total Debt Service			11,899,425				
			GRAND TOTAL			\$58,767,425				

Annual Statement/Performance and Evaluation Report

Capital Fund Program (CFP) Part I: Summary

PHA Name: PHILADELPHIA HOUSING AUTHORITY	Grant Type and Number Replacement Housing Fund Program Grant No: PA26R00250110	Federal FY of Grant: 2010
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- Original Annual Statement Reserve for Disasters/Emergencies
 Performance and Evaluation Report for Program Year Ending:
- Revised Annual Statement (Revision No:)
 Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost			
		Original	Revised	Revised	Revised
1	Total Non-CFP Funds				
2	1406 Operations				
3	1408 Management Improvements				
4	1410 Administrative Costs				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvements				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment-Nonexpendable				
12	1470 Non-Dwelling Space				
13	1475 Non-Dwelling Equipment				
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495 Relocation				
18	1499 Development Activities	5,644,993	0	0	0
19	1501 Collateralization or Debt Service				
20	1502 Contingency				
21	Amount of Annual Grant (Sum of lines 2-20)	5,644,993			
22	Amount of Line 21 Related to LBP Activities				
23	Amount of Line 21 Related to Section 504 Compliance				
24	Amount of Line 21 Related to Security - Soft Costs				
25	Amount of Line 21 Related to Security - Hard Costs				
26	Amount of Line 21 Related to Energy Conservation Measures				

Annual Statement/Performance and Evaluation Report

Capital Fund Program (CFP)

Part II: Supporting Pages

PHA Name: Philadelphia Housing Authority		Grant Type and Number Replacement Housing Fund Program Grant No: PA26R00250110		2010						
Development Number / Name Activities	HA-Wide	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				
						Original	Revised	Revised	Revised	Comments
014	Norris Homes	701490	New Development	1499	51 Units	5,644,993				
			New Development			5,644,993				
			Total Proposed Replacement Housing Fund Activities			5,644,993				
			GRAND TOTAL			\$5,644,993				

Annual Statement/Performance and Evaluation Report

Capital Fund Program (CFP) Part I: Summary

PHA Name: PHILADELPHIA HOUSING AUTHORITY	Grant Type and Number Replacement Housing Fund Program Grant No: PA26R00250210	Federal FY of Grant: 2010
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- Original Annual Statement Reserve for Disasters/Emergencies
 Performance and Evaluation Report for Program Year Ending:
- Revised Annual Statement (Revision No:)
 Final Performance and Evaluation Report

Line No.	Summary by Development Account	Total Estimated Cost			
		Original	Revised	Revised	Revised
1	Total Non-CFP Funds				
2	1406 Operations				
3	1408 Management Improvements				
4	1410 Administrative Costs				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvements				
10	1460 Dwelling Structures				
11	1465.1 Dwelling Equipment-Nonexpendable				
12	1470 Non-Dwelling Space				
13	1475 Non-Dwelling Equipment				
14	1485 Demolition				
15	1490 Replacement Reserve				
16	1492 Moving to Work Demonstration				
17	1495 Relocation				
18	1499 Development Activities	9,704,476	0	0	0
19	1501 Collateralization or Debt Service				
20	1502 Contingency				
21	Amount of Annual Grant (Sum of lines 2-20)	9,704,476			
22	Amount of Line 21 Related to LBP Activities				
23	Amount of Line 21 Related to Section 504 Compliance				
24	Amount of Line 21 Related to Security - Soft Costs				
25	Amount of Line 21 Related to Security - Hard Costs				
26	Amount of Line 21 Related to Energy Conservation Measures				

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Capital Fund Program (CFP)

Part II: Supporting Pages

PHA Name: Philadelphia Housing Authority		Grant Type and Number Replacement Housing Fund Program Grant No: PA26R00250210		2010						
Development Number / Name Activities	HA-Wide	Line Item #	General Description of Major Work Categories	Develop Acct No.	Quantity	Total Estimated Cost				Comments
						Original	Revised	Revised	Revised	
901-910	Scattered Sites	701490	New Development	1499	50 Units	4,704,476				
014	Norris Homes	701490	New Development	1499	51 Units	5,000,000				
			New Development			9,704,476				
			Total Proposed Replacement Housing Fund Activities			9,704,476				
			GRAND TOTAL			\$9,704,476				

APPENDIX C

Appendix C: Public Housing Long term Asset Management Table

Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
James Weldon Johnson House PA002001	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with HOPE 6 and/or LIHTC Application.		Possible Elderly Designation	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Greater Grays Ferry Estates (Formerly known as Tasker Homes) New AMP#s: PA002139 PA002143	Possible mixed-finance development and commercial development including community building on PHA vacant lots and public parcels .	Possible disposition in connection with non-dwelling commercial development including community building.			
Richard Allen Homes Phase II PA002003	Possible new development for residential and non-residential on vacant undevelopped parcels	Possible disposition in connection with the new development.			Possible homeownership component in connection with potential modernization and revitalization.

Appendix C: Public Housing Long term Asset Management Table

Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Richard Allen Homes Phase III PA002133					Includes 15-year tax credit and lease purchase homeownership components.
Raymond Rosen On-Site PA002010					
Wilson Park PA002013	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with HOPE 6 and/or LIHTC Application.		279 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial economic development, management offices, community and supportive services offices and/or open space.	
Norris I Apartments PA002014	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds. PHA plan to apply for HOPE 6, Choice Neighborhood and/or LIHTC Application when available.	Possible demolition in connection with the revitalization, and possible disposition in connection with mixed-finance development.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.

Appendix C: Public Housing Long term Asset Management Table

Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Harrison Plaza PA002015	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with HOPE 6 and/or LIHTC Application.			Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Arch Homes PA002018	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program income, private funds with HOPE 6 and/or LIHTC Application.			Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Spring Garden Apartments PA002020	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with HOPE 6 and/or LIHTC Application.	Potential demolition and disposition applications may be submitted for a portion of site.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.
Falls Ridge PA002130					

Appendix C: Public Housing Long term Asset Management Table

Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Liddonfield Homes I PA002023	Possible candidate for revitalization/development by third party developer, which may include some demolition with capital funds,MTW, program incomes.	Demolition in connection with the required conversion and/or disposition for FMV.		Mandatory conversion of units/parcels for residential development, and/or commercial, economic development.	Possible homeownership component in connection with potential modernization and revitalization.
Queen Lane I Apartments PA002024	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds. PHA plan to apply for HOPE 6, Choice Neighborhood and/or LIHTC Application when available.	Potential demolition and disposition applications in connection with new development and mixed finance.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.
Hill Creek Apts I & II PA002029	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with HOPE 6 and/or LIHTC Application.			Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Abbottsford Homes PA002030	Possible site for additional redevelopment including commercial space, through mixed financing.	Possible disposition of a portion of the site in connection with mixed-finance development.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	

Appendix C: Public Housing Long term Asset Management Table

Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Bartram Village PA002031	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with HOPE 6 and/or LIHTC Application.	Possible demolition in connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.
Oxford Village PA002032	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with HOPE 6 and/or LIHTC Application.	Possible demolition in connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.
Whitehall Apartments I PA002034	Modernization completed 2005				
Haddington Homes PA002035	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with HOPE 6 and/or LIHTC Application.	Possible demolition in connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.

Appendix C: Public Housing Long term Asset Management Table

Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Martin Luther King Plaza PA002036 New PA#s: PA002128 PA002136 PA002149	All Phases completed. New construction of 19 market rate homeownership units on a portion of the site.	Possible disposition in connection with mixed-finance development and/or other sale transactions to City and private developers.			109 Homeownership Units. HOPE VI HO Middle income Program essential elements of Nehemiah, USHA of 1937.
Morton Homes PA002049	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with HOPE 6 and/or LIHTC Application.	Possible demolition in connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development.	47 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.
Westpark Apartments PA002039	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with HOPE 6 and/or LIHTC Application.	Possible demolition in connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development or to private developers.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.
Champlost Homes PA002042				Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	

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Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Mantua Hall PA002045	Under revitalization, which includes some demolition with capital funds, bond proceeds, MTW, Stimulus, program incomes, private funds and LIHTC equity to develop 101 new units.	Building demolished and disposition for mixed-finance development.			
Haverford Homes PA002046	Possible candidate for modernization, rehabilitation, with capital funds, bond proceeds, MTW, program incomes, private funds with HOPE 6 and/or LIHTC Application.			Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.
Blumberg Apartments PA002050	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with HOPE 6 and/or LIHTC Application.	Possible demolition in connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development.	94 units designated.	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component in connection with potential modernization and revitalization.
Whitman Park PA002051					Homeownership development; one unit remain to be sold
Passyunk Homes PA002052	Private entity to develop market rate housing and a new 80,000 square foot building for PHA.	Disposition of property to private developer completed.			

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Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Courtyard Apartments at Riverview PA002053 New PA#: PA002121					
Parkview Apartments PA002054					
Fairhill Apartments PA002055					
Paschall Homes PA002061	Under revitalization, which includes demolition with capital funds, bond proceeds, MTW, Stimulus, program incomes, private funds and LIHTC equity to develop 100 new units.	Demolition in connection with the modernization and revitalization, and possible acquisition/disposition in connection with mixed-finance development.	Possible Elderly Designation		Possible homeownership component in connection with potential modernization and revitalization.

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Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Cassie Holly (Point Breeze Court) PA002062	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with HOPE 6 and/or LIHTC Application.		71 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Katie B. Jackson PA002063	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with HOPE 6 and/or LIHTC Application.		59 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Collegetown Homes PA002065	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with HOPE 6 and/or LIHTC Application.		54 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Holmecrest Apartments PA002066	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with HOPE 6 and/or LIHTC Application.		84 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	

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Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Emlen Arms PA002076			156 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Bentley Hall PA002077			99 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Plymouth Hall PA002079	Rehabilitation with capital funds to develop 53 ACC units		53 Elderly Units Elderly Designation to be revised	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space. Reduce unit count from 60 to 53 with new community space.	

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Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Germantown House PA002152			133 Elderly Units	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
West Park Plaza PA002093	Possible candidate for modernization, rehabilitation with capital funds, bond proceeds, MTW, program incomes, private funds with HOPE 6 and/or LIHTC Application.			Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Brown Street Village PA002096	Homeownership development. All units sold.				Turnkey III Released for Occupancy in 1980-1982. Homeowner's Association formed. Homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.

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Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Herbert Arlene Homes PA002104	Possible candidate for modernization, rehabilitation, revitalization, which may include some demolition with capital funds, bond proceeds, MTW, program incomes, private funds with HOPE 6 and/or LIHTC Application.	Possible demolition in connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development.	Possible Elderly Designation	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Gladys B. Jacobs PA002114	Possible renovation for delivery of enhanced senior support services.		80 Elderly Units		
Eight Diamonds PA00126 PA00141 (Formerly known as Raymond Rosen Off-Site PA002126)					
Spring Garden Revitalization: Phase 1 PA002127					

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Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Spring Garden Revitalization: Phase 2 PA002162	Mixed-finance development by third party developer.	Disposition of scattered site properties for new development			
Scattered Sites PA002000901	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for HOPE 6, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition in connection with the modernization and revitalization, and possible disposition in connection with mixed-finance development.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937. Possible homeownership component in connection with potential modernization and revitalization.
Scattered Sites PA002000902	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for HOPE 6, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.

Appendix C: Public Housing Long term Asset Management Table

Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Scattered Sites PA002000903	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for HOPE 6, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.
Scattered Sites PA002000904	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for HOPE 6, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.
Scattered Sites PA002000905	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for HOPE 6, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.

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Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Scattered Sites PA002000906	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for HOPE 6, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.
Scattered Sites PA002000907	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for HOPE 6, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.
Scattered Sites PA002000908	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for HOPE 6, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.

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Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Scattered Sites PA002000909	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for HOPE 6, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.
Scattered Sites PA002000910	Possible development, rehabilitation of existing buildings, demolition of existing buildings, disposition of properties and new construction of units in connection with replacement unit initiative or mixed-finance developments, or City of Philadelphia Neighborhood Transformation Initiative, or third party mixed-finance/revitalization developments. PHA plan to apply for HOPE 6, Choice Neighborhood, LIHTC, RACP and any other state and city funding sources when available.	Possible demolition/disposition of non-viable units for neighborhood redevelopment activity.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Section 32 of USHA of 1937.
St Anthony's Senior Residence: PA002131			38 Elderly Units		
Inglis House	May provide capital funds, ACC subsidy and/or Section 8 vouchers for this project.				
City-Wide	Provision of ACC subsidy, capital funds or HCV.	Dispo/Demo application to be submitted to HUD.			

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Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Scattered Site Disposition: City-Wide	Disposition Plan to be developed and implemented. Disposition of properties at market rate.	Possible demolition in connection with the modernization and revitalization. Disposition application may be required.			Possible Homeownership Component: Revised 5(h)/Section 32 of USHA of 1937.
Multi-Family Units for Replacement Housing Units	Site-Based Waiting List. Using capital funds to acquire and develop these replacement housing units. Provide ACC subsidy.	Disposition and acquisition application may be required.	Possible Elderly Only designation.		
Suffolk Manor PA002132	Possible major exterior envelope and air conditioner heating system to be improved.		77 Elderly Units		
Cambridge Plaza Phase I PA-002137					
Cambridge Plaza Phase II PA-002129					
Cambridge Plaza Phase III Phase I PA002147					
Mt. Olivet PA002138	Possible major exterior envelope and air conditioner heating system to be improved.		161 Elderly Units		

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Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Lucien E. Blackwell Homes Phase I PA002145					
Lucien E. Blackwell Homes Phase II PA002150					
Lucien E. Blackwell Homes Phase III PA002153					
Lucien E. Blackwell Homes Phase IV (Marshall Shepard Village) PA002156					
St Ignatius Phase I (Angela Court II) PA002146 PA002159			67 and 54 Elderly Units Designated		
Neumann North PA002148			67 Elderly Units Designated		

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Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Ludlow HOPE 6 Area Scattered Sites PA #: PA002154	Development completed				
Nellie Reynolds Garden PA002158	Development completed		64 Elderly housing designation.		
Warnock PA002160	Development completed				
Warnock PA002161	Acquisition, new development for 45 housing units and rehabilitation of housing stock along with neighborhood revitalization efforts with PHA offices and Elderly Services space.		45 Elderly housing designation.		

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Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Replacement unit Initiative	Possible acquisition of foreclosure properties, 202 properties, Private properties in combination with LIHTC and mixed finance development to develop new replacement units.	Possible demolition in connection with revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	Possible Elderly Designation		Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Poplar to Oxford: Planning and Development Initiative	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units. PHA plan to submit the LIHTC and/or other State, City funding sources for new development.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Eastern North Philadelphia	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Eastern Germantown Infill	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.

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Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Spring Garden Area Unit Conversion	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Empowerment Zone 2100 Block of American		Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
South Phila area planning	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Southwest Phila Area planning	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.

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Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
West Philadelphia North of Market Street	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Brewerytown	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Francisville	Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only Designation Plan	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Mill Creek Extension East	Possible scattered sites acquisition. Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization.			Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.

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Name, Number and Location	Development Activities	Demolition/ Disposition Activities	Designated Housing Activities	Conversion Activities	Homeownership Activities
Mill Creek Extension West	Possible scattered sites acquisition. Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization.			Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Oak Lane	Possible scattered sites acquisition. Acquisition, new development and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.	May be requesting Elderly or Disabled Only designation.	Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
Transitional Housing	New construction of transitional housing units for homeless families and individuals and rehabilitation of housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	
Kensington North	Acquisition, new development for 80 units and rehabilitation of scattered site housing stock along with neighborhood revitalization efforts. May be developed by PHA or alternative financing services by a CDC, non-profit, or for-profit organization. May use ACCs and/or Capital Funds to develop units.	Possible demolition in connection with modernization and revitalization, and possible disposition in connection with mixed-finance development. Additional disposition applications and conveyances to RDA and/or PHA wholly-owned subsidiary and/or private owner may be required.		Possible conversion of units/parcels for residential unit reconfiguration and commercial, economic development, management offices, community and supportive services offices and/or open space.	Possible homeownership component, subject to Section 32 of the USHA of 1937 will include lease purchase, conventional sale and Housing Choice vouchers.
	* Approximately 374 Scattered Site Properties have been identified for demolition or disposition for Master Planning purposes.				

APPENDIX D

**Comparative Summary of Changes
Existing ACOP Policy vs. Proposed ACOP Policy**

No.	Page No	Sub-Heading	Existing Policy	Proposed Policy
1. Overview of the Program and Plan—New Chapter				
1	1	Moving to Work Demonstration	<ul style="list-style-type: none"> References original MTW Agreement 	<ul style="list-style-type: none"> Expanded description of MTW as it relates to Public Housing and includes reference to amended, restated MTW Agreement and related effective date
2	1	Mission Statement	<ul style="list-style-type: none"> Old Mission Statement—Part of “Introduction” Chapter 	<ul style="list-style-type: none"> Revised to reflect PHA’s new Mission Statement
3	2	Updating and Revising the Plan	<ul style="list-style-type: none"> Not in existing policy 	<ul style="list-style-type: none"> PHA will review and update ACOP to reflect changes in regulations, MTW initiatives, PHA operations, or when needed to ensure staff consistency in operation. The original ACOP and any changes are approved by PHA’s Board of Commissioners.
4	2	Applicable Regulations and Agreements	<ul style="list-style-type: none"> Not in existing policy 	<ul style="list-style-type: none"> A listing of applicable 24 CFR cites and the PHA MTW Agreement
2. General Policies				
5		Sections moved to New Fair Housing Chapter	<ul style="list-style-type: none"> Existing sections (with some revisions) moved to NEW Fair Housing & Equal Opportunity Chapter: <ul style="list-style-type: none"> Privacy Fair Housing & Equal Opportunity Housing & Employment Outreach & Affirmative Marketing Assistance to Families Who Claim Discrimination Occupancy of Accessible Dwelling Units Reasonable Accommodation Translation of Documents 	<ul style="list-style-type: none"> See New Fair Housing & Equal Opportunity Chapter (see Chapter 3, 16-31)
6	3	Program Accounts and Records	<ul style="list-style-type: none"> Provides guidance for basic record retention 	<ul style="list-style-type: none"> If a hearing to establish a family’s citizenship status is held, longer retention requirements may apply for some types of documents. Includes references to additional documents to be retained by PHA: <ul style="list-style-type: none"> Documentation supporting the establishment of Public Housing maximum rents Documentation supporting the establishment of utility allowances and surcharges
7	3-4	Records Management <ul style="list-style-type: none"> Privacy Act Requirements Upfront Income Verification (UIV) Records 	<ul style="list-style-type: none"> Not in existing policy 	<ul style="list-style-type: none"> Additional detailed language has been added to the ACOP on how PHA will handle matters of applicant/tenant privacy with respect to records management, records retention, individual/household information and security as it relates to: <ol style="list-style-type: none"> Records Management Privacy Act Requirements Upfront Income Verification (UIV) Records

No.	Page No	Sub-Heading	Existing Policy	Proposed Policy
		o Criminal Records		4. Criminal Records
8	4-5	Reporting Requirements for Children with Environmental Intervention Blood Lead Level	<ul style="list-style-type: none"> Not in existing policy 	<ul style="list-style-type: none"> PHA's responsibility related to reporting children with environmental intervention blood lead levels—this is a regulatory requirement that PHAs notify the public health department and HUD Field Office in writing if a child is identified as having an environmental intervention blood level.
9	5	Debt and Repayment Agreements • Consequences of Default	<ul style="list-style-type: none"> Provides in various ACOP chapters— <ul style="list-style-type: none"> That PHA will enter into repayment agreements for debt owed to PHA to allow tenant to: <ul style="list-style-type: none"> cure Notice of Lease Termination repay overpaid their housing subsidy process a transfer Default is grounds for <u>denial of admission or termination of assistance</u> 	<ul style="list-style-type: none"> Revised to provide PHA with discretionary authority to enter into a repayment agreement, including thresholds for repayment agreements, repayment terms and provisions for termination due to repayment agreements. When an applicant owes PHA money from a previous Public Housing residency or HCV program participation, PHA will require that the entire amount be paid in full prior to allowing the applicant admission or re-admission to the Public Housing program. Existing program participants that owe money to PHA, at PHA's discretion, may be required to enter into a payment agreement. Additionally, PHA may move to terminate assistance without offering the tenant a repayment agreement. Default is grounds for <u>termination of assistance</u>
10	5	Unit Based Assistance	<ul style="list-style-type: none"> Not in existing policy 	<ul style="list-style-type: none"> PHA may attach or pay unit-based assistance to a variety of property types that include but are not limited to nursing homes or facilities providing continuous psychiatric, medical, nursing services, board and care, or intermediate care (including assisted living facilities); units that are owned or controlled by an education institution or its affiliate and are designated for occupancy by students; and transitional housing.
3. Fair Housing & Equal Opportunity—NEW CHAPTER				
11	6-7	Non-discrimination	<ul style="list-style-type: none"> Included as part of General Policies chapter—includes factors for which discrimination is prohibited 	<ul style="list-style-type: none"> Expands description of Non-discrimination practices to include examples of ways in which PHA will not discriminate based on the factors for which federal law prohibits discrimination. It also includes a list of governing laws, rules and regulations related to fair housing, equal opportunity in housing and employment
12	7	Providing Information to Families	<ul style="list-style-type: none"> Not in existing policy 	<ul style="list-style-type: none"> Include as part of the new tenant Orientation Process the provision that PHA will ensure that families are provide information about civil rights laws applicable to their tenancy with PHA
13	7-8	Privacy	<ul style="list-style-type: none"> Included and revised 	<ul style="list-style-type: none"> Provides specific assurance of how sensitive information related to an applicant's/tenant's disability is handled by PHA (i.e. any information received related to the nature of an applicant's/tenant's disability will be destroyed or returned to the applicant/tenant. Provides detail on how applicants/tenants can access their information related to reasonable accommodation requests
14	8-10	Improving Access to Services for Persons with Limited English Proficiency	<p>4. Not in existing Policy</p> <p>1. Translation of Documents—provides brief description of how PHA will determine whether to translate documents into other languages</p>	<ul style="list-style-type: none"> Outlines HUD requirement of policy related to improving access to public housing for persons with Limited English Proficiency (LEP), including provisions for determining the level of access needed by LEP persons and as a result what PHA will provide by way of oral interpretation, written interpretation, and the development of an implementation plan.

No.	Page No	Sub-Heading	Existing Policy	Proposed Policy
		1. Oral Interpretation 2. Written Translation 3. Implementation Plan	2. Not in existing Policy	
15	10-14	VAWA	<ul style="list-style-type: none"> Not in existing Policy 	<ul style="list-style-type: none"> HUD requires under the Violence Against Women Reauthorization Act of 2005 (VAWA) that all housing authorities establish policies that prohibit the denial of admission to an otherwise qualified applicant on the basis that the applicant is or has been a victim of domestic violence, dating violence or stalking AND that prohibit against the termination of tenancy if the basis for the proposed termination is domestic violence, dating violence or stalking committed against a tenant or immediate member of the tenant's family. There are a series of actions/procedures/documents that need to be revised/created to ensure compliance with the proposed new policy (i.e. initial notification of the policy, revision of 30-day notices, etc.).
16	14	Establishing Public Housing Maximum Rents	<ul style="list-style-type: none"> Not in existing Policy 	<ul style="list-style-type: none"> Briefly describes policy for prorating assistance for mixed families by establishing maximum rents.
4. Eligibility				
17	15-16	Series of new/revised terms/phrases	<ul style="list-style-type: none"> Included and revised 	<ul style="list-style-type: none"> A number of additional terms/phrases are added/revised for ease of reference as key for considering eligibility. In some cases these terms/phrases are referenced only in the Glossary of Terms in Current approved ACOP (2005): Family, Household, Dependent, Full-time student, Dependent, Full-time student,
18	16-17	Elderly, Near-elderly Persons and Elderly Family	<ul style="list-style-type: none"> Not in policy chapter, but defined in Glossary of Terms ONLY 	<ul style="list-style-type: none"> Near-elderly definition has been removed from this chapter, Elderly person and elderly family definition updated to reflect designated housing plan. Elderly Persons <ul style="list-style-type: none"> An elderly person is defined as individual who is at least 55 years old. For the purposes of admission to public housing designated as elderly-only, the definition of <i>elderly</i> for each designated project will be specified in PHA's Designated Housing Plan in effect and may differ from the foregoing definition. Elderly Family <ul style="list-style-type: none"> An elderly family is defined as one with a head of household, co-head, spouse or sole member who is at least 55 years old. For the purposes of admission to public housing designated as elderly-only, the definition of <i>elderly</i> and <i>elderly family</i> for each designated project will be specified in PHA's Designated Housing Plan in effect and may differ from the foregoing definition.
19	17	Persons with Disabilities and Disabled Family	<ul style="list-style-type: none"> Not in policy chapter, but defined in Glossary of Terms ONLY 	<ul style="list-style-type: none"> Persons with Disabilities and Disabled Family—Include as section in Eligibility chapter as definition key to eligibility determination related to establishing familial relationship and calculating rent and income.

No.	Page No	Sub-Heading	Existing Policy	Proposed Policy
20	17-18	Foster Children and Foster Adults	<ul style="list-style-type: none"> Not in policy chapter, but defined in Glossary of Terms ONLY 	<ul style="list-style-type: none"> Foster Children and Foster Adults—to provide needed guidance for determining foster relationships
21	18	Live-in Aide	<ul style="list-style-type: none"> Included prohibition on spouse as Live-in-Aide 	<ul style="list-style-type: none"> Removes prohibition on spouse as Live-in Aide
22	19	Joint Custody of Dependents	<ul style="list-style-type: none"> % time dependent subject to joint custody has to live with an applicant/tenant family to be considered a member of the family = 51% 	<ul style="list-style-type: none"> % time dependent subject to joint custody has to live with an applicant/tenant family to be considered a member of the family = 50%
23	19	Caretaker of a Child	<ul style="list-style-type: none"> Not defined in existing Policy 	<ul style="list-style-type: none"> Caretaker of a Child—provides understanding/guidance in the event neither a parent nor designated guardian remain in the household
24	19-20	Income Eligibility		<ul style="list-style-type: none"> Revised language for definitions of family income including: <ul style="list-style-type: none"> A low-income family is a family whose annual income does not exceed 80 percent of the median income for the area, adjusted for family size. A very low-income family is one whose annual income does not exceed 50 percent of the median income for the area, adjusted for family size. An extremely low-income family is a family whose annual income does not exceed 30 percent of the median income for the area, adjusted for family size.
25	20	Declaration of Citizenship	<ul style="list-style-type: none"> Included and revised 	<ul style="list-style-type: none"> Include requirement that a family must identify in writing any family members who elect not to contend their immigration status.
26	20	Ineligible Noncitizens	<ul style="list-style-type: none"> Not in existing policy 	<ul style="list-style-type: none"> Describes that an ineligible noncitizen is a non-citizen who does not wish to contend their immigration status and explains PHA will not verify the status of those who do not contend their immigration status and is not required to report an individual's unlawful presence in the US to USCIS Further explains noncitizen student status
27	20-21	Mixed Families	<ul style="list-style-type: none"> Describes what "Mixed Families" are with brief statement about written notice of ineligibility if the family has no eligible members. 	<ul style="list-style-type: none"> Includes requirement that PHA will not provide assistance to a family before at least one member is verified as an eligible member. It also includes detail about the notice of ineligibility and the process available to families who want to contest the determination.
28	21-23	Social Security Numbers	<ul style="list-style-type: none"> Requires SSNs for members 6 years old and older; Allows for persons who attest to not being issued an SSN to be housed; Allows extended timeframes to produce SSNs for the elderly 	<ul style="list-style-type: none"> Requirement for all HH members to provide a SS number as a condition for placement on the Waiting List. Alternate arrangements will be made for mixed families. Included time frame required for submission of SS Numbers for participants who have not previously provided SS Numbers. Policy includes penalties for failure to submit documentation Included SS number documentation requirement prior to approval of the addition of an adult household member. Included SS number documentation requirement for addition of a child to an existing household. Policy includes required time frame for submission of documentation.
29	23	Photo ID	<ul style="list-style-type: none"> Valid photo ID required for the Head of Household only 	<ul style="list-style-type: none"> Requires that all adult members 18 years old or older to provide valid photo ID
30	23	Family Consent to Release of Information	<ul style="list-style-type: none"> Referenced in other chapters/sections but not comprehensive 	<ul style="list-style-type: none"> Policy makes direct reference as HUD requirement and consequences for failure to provide

No.	Page No	Sub-Heading	Existing Policy	Proposed Policy
31	23	Public Housing Tenant Responsibility Requirement	<ul style="list-style-type: none"> Not defined in existing policy 	<ul style="list-style-type: none"> Applicants who currently reside in the Housing Choice Voucher program must provide documentation of their move-out notice, have a letter of good standing from the site manager and be in compliance with HCV program requirements in order to be eligible for admission to the Public Housing program.
32	24	Debt Screening	<ul style="list-style-type: none"> Included and revised 	<p>The following provisions have been added:</p> <ul style="list-style-type: none"> Once the debt is identified by PHA, the applicant will have 90 days to pay it in full or the applicant will be rejected. Debt screening records will be destroyed, once the purpose(s) for which the record was requested has been accomplished, including expiration of the period for filing a challenge to a PHA action without institution of a challenge or final disposition of any such litigation.
33	24	Credit History Screening	<ul style="list-style-type: none"> All applicants will be screened 	<ul style="list-style-type: none"> The Head of Household and the Co-head (if applicable) will be screened.
34	25	Criminal Record Screening	<ul style="list-style-type: none"> Included and revised 	<ul style="list-style-type: none"> Provides additional detail related to Criminal Record Screening PHA will conduct criminal record screening upon admission to the program and at regular recertifications for all adult household members. Additionally, PHA may conduct additional criminal record screenings if necessary to ensure program integrity. If the criminal background check identifies a pending criminal investigation, PHA will defer an eligibility determination until the case is decided. Criminal record checks will be considered current for a period of 180 days. If lease up (for new applicants) and recertification (for existing participants) is not effective within 180 days from the date the CRC was run, a new CRC will be required.
35	25-29	Resources Used to Check Applicant Suitability <ul style="list-style-type: none"> Mandatory Denial of Admission Other Permitted Reasons for Denial of Admission Previous Behavior 	Limited reference to the basis for the denial of admission and the criteria for deciding to deny admission as part of "Criminal Record Screening" and "Criminal Record and Drug Abuse Screening" sub-headings <p>Mandatory denial of admission for criminal and drug related offenses within the past three years</p>	<ul style="list-style-type: none"> Provides broader guidance for basing the denial of admission and criteria used for deciding to deny admission: <ul style="list-style-type: none"> Resources Used to Check Applicant Suitability Basis for mandatory denial and other permitted reasons for denial Previous Behavior—specific language added re: civil judgments and utility payment history as factors for determining unsuitable past performance in meeting financial obligations, inclusive of timeframes and balance thresholds (utilities) Changed threshold for past criminal and drug related activity from denial of admission for offenses within the last seven years.
36	29	Criteria for Deciding to Deny Admission	Limited reference to the basis for the denial of admission and the criteria for deciding to deny admission as part of "Criminal Record Screening" and "Criminal Record and Drug Abuse Screening" sub-headings	<ul style="list-style-type: none"> Criteria: <ul style="list-style-type: none"> Evidence Consideration of Circumstances Removal of a culpable family member's name from the Application Consideration of Reasonable Accommodation(s)
37	29-30	Obtaining Information from Drug Treatment Facilities	<ul style="list-style-type: none"> Not in existing policy 	<ul style="list-style-type: none"> Provides detailed guidance on mitigating evidence that an applicant/tenant family member is currently engaging in illegal drug activity and the family claims the member has successfully completed supervised drug or alcohol rehabilitation.
38	30	Notice of Eligibility and Denial	Included but revised	<ul style="list-style-type: none"> Denial: <ul style="list-style-type: none"> Removal of requirement that if based on a criminal record or sex offender registration information, an

No.	Page No	Sub-Heading	Existing Policy	Proposed Policy
				<p>applicant family appears to be ineligible, PHA will notify the family of proposed denial, offering an opportunity to view the information and provide mitigation</p> <ul style="list-style-type: none"> - Language added to allow PHA to issue Notice of Denial for all ineligible decisions, including those based on criminal record or sex offender registration. These families will be given the opportunity to dispute the denial as part of the Grievance process. - Note: PHA not currently issuing Proposed Notice of Denial and instituting this process would create an administrative burden—Change requires MTW waiver.
5. Application, Waiting Lists and Tenant Selection				
39	31	Overview	Included (See Admissions Determination Chapter) and expanded	<ul style="list-style-type: none"> • Identifies the Tenant Selection Plan as the following PHA policies: <ul style="list-style-type: none"> - Applications, Waiting list and Tenant Selection - Occupancy Standards - Unit Offer
40	31	Applying for Assistance	Families interested in applying must complete a written application	<ul style="list-style-type: none"> • Establishes new means by which pre-applications can be submitted: <ul style="list-style-type: none"> - Electronically via internet or kiosk - By phone • Includes 2 additional means by which applications (hard copies) could be obtained: <ul style="list-style-type: none"> - Site Offices - Download from the PHA web-site
41	31-32	Accessibility of the Pre-Application/Application Process	Brief statement about pre-applications being made available upon request in an accessible format for persons with disabilities	<ul style="list-style-type: none"> • Expands current policy by including other groups in addition to the disabled that may need the application process to be accessible: <ul style="list-style-type: none"> - Certain elderly individuals - Persons with Limited English Proficiency • States that application-taking facilities will be accessible • The pre-full application process is fully accessible or PHA will provide an alternate approach that provides full access to the process
42	32	Placement on the Waiting List(s)	Discussed briefly in different sections with focus on organization and selection from the waiting list related to Master List numbers, preferences and bedroom sizes	<ul style="list-style-type: none"> • Detailed description of how pre-applications are placed on the waiting list including: • Placement on the waiting list by date and time of application, the type and size of the unit required and any applicable Special Programs and/or Allocations
43	32-33	Managing Waiting List(s)	Discussed briefly in different sections with focus on organization and selection from the waiting list related to Master List numbers, preferences and bedroom sizes	<ul style="list-style-type: none"> • Refers to the organization of the waiting List(s) to ensure accurate identification and selection of family in proper order • Details the information to be maintained on each family on the Waiting List(s)
44	33	PHA Waiting List(s)	Referred to as Waiting List(s) for pre-applications—Site-based and Centralized	<ul style="list-style-type: none"> • Redefines types of Waiting Lists (Waiting Lists): <ul style="list-style-type: none"> o Central Waiting Lists (CWLs)—managed by Central Admissions <ul style="list-style-type: none"> - 1st Available Unit - Referral Program (Special Programs) - ADA/504 o Site-based Waiting Lists —managed by individual developments
45	33-34	Establishing and Maintaining Site-based Waiting List(s)	Refers to operating Centralized Waiting List and transition from single Centralized Waiting List to Site-based Waiting list, including a phase-in that would	<ul style="list-style-type: none"> • Describes how Site-Based Waiting and 1st Available Unit Lists will be established, including initial choice of lists by families, ability to change their listing, development types in the PHA inventory for which Site-Based Waiting Lists will be maintained (Family and Senior/Older Adult Designated)

No.	Page No	Sub-Heading	Existing Policy	Proposed Policy
			include maintenance of both list types simultaneously	<ul style="list-style-type: none"> Includes the number of Waiting Lists for which an applicant family can apply: <ul style="list-style-type: none"> Up to 5 SBILs OR 1st Available
46	34-35	Site Based Waiting List Administration	Administration of the Waiting List is the responsibility of the Admissions Department	<ul style="list-style-type: none"> Outlines the roles and responsibilities of the Central Admissions Department and Development/Site Offices in the administration of Waiting Lists, including but not limited to managing transfer Waiting Lists, managing ADA/504 Waiting Lists, providing technical assistance, quality control, screening, lease-ups, updating/purging Waiting List(s), managing, processing changes in head of household, conducting informal hearings, etc.
47	35	Closing and Opening the Waiting List	<ul style="list-style-type: none"> Opening included, but only as it refers to the need to meet PHA income targets Brief statement giving PHA ability to close if adequate pool of applicants exists to occupy available units 	<ul style="list-style-type: none"> Expands basis for determining need to open an Waiting list, related notification requirements and pre-application intake process (if Waiting List is open for a specific window of time) Includes policy allowing PHA to close Waiting Lists completely or restrict intake by type of development, by size and type of dwelling unit based on PHA assessment that there are enough applicants to fill projected vacancies. Specifically states that if PHA closes a Waiting List, either in whole or part, the agency will NOT maintain a list of families who wish to be notified when the Waiting List is re-opened Includes public notice requirements
48	35-36	Family Outreach	Not in existing policy	<ul style="list-style-type: none"> Expands upon policies for Opening Waiting Lists by describing outreach efforts to be undertaken based on PHA's assessment to ensure there are a sufficient number of applicants on the waiting list to fill anticipated vacancies and to assure that the PHA is affirmatively furthering fair housing and complying with the Fair Housing Act.
49	36-37	Updating the Waiting List(s): <ul style="list-style-type: none"> Reporting Changes in Family Circumstances Family Break-up Purging the Waiting List Reinstatement to the Waiting List 	Speaks directly to collective updating and purging of entire Waiting List, with brief description of family's obligation to notify PHA whenever the family's preference changes	<ul style="list-style-type: none"> Includes policies for families updating their pre-applications/applications outside of a mass Waiting List update process: reporting changes in family circumstances, family break-up and removal from the Waiting List(s) Includes restriction on reapplying after family is removed from an Waiting list—must wait 1 year from removal date Includes reference to timeframe and manner for mass updating of the Waiting Lists: every 3 years OR as needed, with PHA to prescribe the format for updating
50	37-38	Removal from the Waiting List	Not in existing policy	<ul style="list-style-type: none"> Once a family is housed as a participant of any PHA subsidized housing program PHA will remove the family's name from all other PH Waiting Lists and/or HCV Waiting Lists. Additionally, PHA will require that the family sign a lease addendum whereby the family acknowledges that their name will be removed from all other PH Waiting Lists and HCV Waiting Lists. Further the lease addendum will stipulate that the family may not reapply to any PHA subsidized housing program until after the initial lease term and then only if the Waiting List for the desired program/development is open. Expands policy on removal from Waiting List(s) to include additional at the request of the applicant
51	38	Order of Selection <ul style="list-style-type: none"> Site-Based Waiting Lists Applicant 	Included based on detailed preference structure	<ul style="list-style-type: none"> Preference Structure in existing policy removed along with Master Waiting List Numbers as basis for order of selection and replaced with date and time of application, projected unit sizes/types available, and income targeting (if necessary) as the basic guidance for selection from Waiting Lists

No.	Page No	Sub-Heading	Existing Policy	Proposed Policy
		Selection Method		<ul style="list-style-type: none"> • Priority selections related to Special Programs/Allocations will be considered based on families from these categories already in the Ready Pool • Includes detailed description with examples of how applicants will be selected from the Site-based Waiting Lists: <ul style="list-style-type: none"> - 1st Available Unit Option: An applicant with an application date earlier than an applicant on a SBWL at a development with an available unit will be selected from the Waiting list for the unit at that property. For example, an applicant with an application date of March 1, 2007 who has selected the “1st Available Unit Option” will be selected from the Waiting List before any applicant on a SBWL with an application date and time after March 2, 2007 (this assumes that the selection is for the appropriate bedroom size and any other relevant unit features). - Site-Based Waiting Lists: An applicant who has applied to be placed on the Waiting Lists at multiple developments will be selected from those respective lists by date and time of application. This only holds true if there are no applicants on the 1st Available Waiting List who have an earlier application date and time than the applicant on the top of a SBWL (this assumes that the selection is for the appropriate bedroom size and any other relevant unit features). • Also, provides guidance on how applications for applicants listed on multiple lists are handled if an applicant's name reaches the top of one list for screening: <ul style="list-style-type: none"> - Once an applicant is selected from a SBWL for screening, the applicant's name will remain on the Waiting List(s) of other sites for which the applicant has applied until the applicant accepts a unit.
52	38-39	Income Based Preference at Scattered Sites	Not included	<ul style="list-style-type: none"> • PHA intends to implement a policy where income based preferences will be used at scattered sites. The policy includes selection and admission of established percentages of applicants from the Waiting Lists by income tier in order to achieve PHA's deconcentration goals. PHA will periodically review and modify these percentages to achieve desired deconcentration goals. PHA proposes the following schedule for initial implementation: <ul style="list-style-type: none"> - 25% of applicants selected from the Waiting List will have incomes at or below 30% of AMI - 25% of applicants selected from the Waiting List will have incomes between 31% and 50% of AMI - 25% of applicants selected from the Waiting List will have incomes between 51% and 65% of AMI - 25% of applicants selected from the Waiting List will have incomes between 66% and 80% of AMI • PHA will continue to monitor its income target goals to ensure that 75% of families assisted are very low income families. If there are no applicants on the Waiting List who meet the established income preference and the unit is ready for re-rental and leasing and the unit has been vacant for more than sixty consecutive days, PHA will offer occupancy at scattered sites to eligible families outside of the established income preferences • This policy is proposed pursuant to PHA's authority under its Moving to Work Agreement with the US Department of Housing and Urban Development (HUD). Following a public hearing and Board approval, PHA will submit this policy as part of PHA's Year Ten Moving to Work Annual Plan.
53	39-40	Targeted Populations	Designated Housing not included in existing policy Described as Special Admissions (revised and expanded)	<ul style="list-style-type: none"> • Generally describes priority admissions for specific populations: <ul style="list-style-type: none"> - Designated Housing—Senior (Elderly Only Units/Developments) • Replaces Special Admissions with Special Programs and Allocations and includes new programs/allocations and reclassifies to include priority categories: <ul style="list-style-type: none"> - New—Nursing Home Transition Initiative and Liberty Resources Incorporated, Special Preference

No.	Page No	Sub-Heading	Existing Policy	Proposed Policy
54	40	Deconcentration of Poverty and Income-Mixing	Not included in existing policy	<ul style="list-style-type: none"> - Re-categorized—Super-Preference • PHA has implemented a number of initiatives that, while the primary purpose is not deconcentration, collectively represent a comprehensive deconcentration policy focused on self-sufficiency and strengthening neighborhoods: • Raising the incomes of families already living in Public Housing by offering and/or coordinating career training and increasing employment options through work with Community Partners • Attracting a greater mix of incomes through expanded and integrated community policing and lease enforcement efforts • Improving conditions in developments and communities where PHA housing exists, and • Integrating homeownership and rental units using tax credit financing
55	40	Notification of Selection	Included and revised	<ul style="list-style-type: none"> • Provides additional detail about what information is included in letter and outcome of applications for letters returned to PHA
56	40-41	Application Interview	Included and revised	<ul style="list-style-type: none"> • Includes the following additional policies: <ul style="list-style-type: none"> - A family's right to have an advocate, interpreter or other person to assist with the application and interview process. - Translation services will be provided for LEP applicants in accordance with PHA's LEP plan - All adult members of the household are to attend the interview • Outlines process for collecting documents necessary for eligibility determination if not provided during the interview, including timeframe and PHA approved extensions.
57	41-42	Final Eligibility Determination	Included and revised	<ul style="list-style-type: none"> • Includes the following policies: <ul style="list-style-type: none"> - Returning families to the Waiting List if it is determined that a different bedroom size is required - One (1) year prohibition from re-applying if denied assistance - Requirement that PHA will notify the family once determined eligible and provide approximate date of occupancy - References placement in the Ready Pool once determined eligible - Reference to Home Selection Day and Unit Assignment processes for offering families available units
6. Occupancy Standards and Unit Offers—New Chapter				
58	43	Minimum and Maximum Persons in a Unit	<ul style="list-style-type: none"> • Bedroom sizes 4-6 have Minimum Person/Unit requirements of 5, 7, and 9. 	<ul style="list-style-type: none"> • Changes Bedroom sizes 4-6 Minimum Person/Unit requirements to 4, 5, and 6 ensuring PHA ability to deal with special circumstances.
59	43-45	Occupancy Guidelines	<p>The following #'s correspond with those listed in the Proposed Policy column.</p> <ol style="list-style-type: none"> 1. Includes language allowing families who may qualify for more than one unit size to choose at pre-application and update which size unit they want 2. Includes reference that units must meet "...the applicable UPCS space requirements." 3. Does not define an adult as part of the Occupancy Guidelines 	<ul style="list-style-type: none"> • No more than two (2) persons per bedroom will be the standard for the smallest unit a family may be offered; • Taking into account family size and composition, the largest unit size that a family may be offered would provide no more than one bedroom per family member (exceptions for persons with disabilities, relocation, and emergencies are permitted); • An adult is a person who is 18 years of age or older; • A child is a person below 18 years of age; • Two adults of the same sex who are of 2 different generations (15 year age difference) do not have to

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			<p>4. Existing policy makes reference to 3 relationship types in one guideline—“different generations”, “opposite sex” and “partners”</p> <p>a. Makes reference to persons of different generations not having to occupy the same bedroom, but does not define “generation”.</p> <p>5. Indicates that a parent does have to share a bedroom with a child over 2; therefore, “...infants up to 24 months of age are expected to share a bedroom with the parent or parents”. Also indicates that PHA may modify this guideline at the request of the parent.</p> <p>6. Two children of the opposite sex will not be required to share a bedroom unless requested by the HOH and approved by PHA.</p> <p>7. No policy prohibiting the assignment of efficiency units to a household consisting of a single parent and a child.</p> <p>8. No prohibition on the family members of live-in aides residing in the unit.</p> <p>9. Joint Custody—No guidance included on how to determine unit size in this situation</p> <p>10. Does not address the fact that a single person can live in either an efficiency or a 1 bedroom unit.</p> <p>11. Away from household due to employment—guidance not included.</p> <p>12. No provision allowing for separate bedroom for household member with documented medical reasons.</p> <p>13. No provisions allowing PHA to provide larger units than Occupancy Standards allow in order to prevent vacancies.</p>	<p>share the same bedroom. For example, a 30 year old female will not be required to share a bedroom with a 50 year old female;</p> <ul style="list-style-type: none"> • A husband and wife, or a couple that has an interdependent relationship will be allocated one bedroom; • A single parent will be required to share a bedroom with his/her child up until the child is 3 years old; • PHA will not assign an efficiency unit to a household consisting of a parent and child; • Two children of the opposite sex will not be required to share a bedroom. At the request of the head of the household, PHA may consider modifying this requirement; • Two children of the same sex share a bedroom regardless of age; • An unborn child will not be counted as a person in determining unit size. A single pregnant woman may be assigned to a one-bedroom unit; • PHA will count a child who is temporarily away from the home because the child has been placed in foster care, kinship care, the custody of the Dept. of Human Services or is away at school so long as the family can document that the child will be living with the family; • A live-in aide may be assigned his/her own bedroom. Single elderly or disabled residents with live-in aides will be assigned two bedroom units; • PHA will allow family members of live-in aides to reside in the unit provided the addition of such family members does not produce an under-housed situation as determined by PHA occupancy standards. For example if a live-in aide has a daughter, the live in aide’s daughter may reside in the unit, provided the daughter shares the bedroom with her mother or another household member; • Children specified in joint custody agreements will be considered family members if the agreement specifies that they live with the parent for 50% or more of the time (at least 183 days a year). PHA will require verification of the custody agreement; • Space may be provided for a family member who is away at school but who lives with the family during school recesses; • Unless a live-in aide resides with the family, the family unit size for any family consisting of a single person must be a zero or one bedroom unit; • A household member who is required by employment to be away from the household for more than 183 days but whose income is included in the determination of household income will be counted for purposes of determining the unit size; • At the discretion of PHA, a household member may be assigned a separate bedroom if required for documented medical reasons; • PHA will follow the maximum HQS space standards in determining the maximum allowable persons in a unit; • If a family opts for a smaller unit size than would normally be assigned under these standards, the family will be required to sign a statement agreeing to remain in the unit at least one year from the date of admission or until there is a change in family composition that dictates the need for a new unit; • When a family is actually offered a unit, but they no longer qualify for the unit size where they were placed on the Waiting List, they will be moved to the appropriate Waiting List, retaining their preferences and date and time of application. This may mean that they may have to wait longer for the

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				<ul style="list-style-type: none"> next unit offer; PHA may change the family's bedroom size sub-list when warranted while the family is on a Waiting List(s); and To prevent vacancies, PHA may provide an applicant family with a larger unit than the occupancy standards permit. However, in these cases the family must agree to move to a suitable, smaller unit when another family qualifies for the larger unit and there is an appropriate size unit available for the family to transfer.
60	45	Exceptions to Occupancy Guidelines	Included and revised	<ul style="list-style-type: none"> Additional language: <ul style="list-style-type: none"> - Allowing PHA to require HOH to sign a lease amendment acknowledging exception and agreeing with related requirements - How PHA will evaluate and grant requests
61	45	Processing Exceptions	No reference in existing policy	<ul style="list-style-type: none"> New language added to describe requirements for requesting exceptions and how PHA will notify the family of the decision.
62	45-46	Series of sections related to Absences of Family Members	Limited references to children away at school and income of members who are temporarily absent	<ul style="list-style-type: none"> Provides more detail related to different circumstances in which a family member is absent, including definitions of permanent and temporarily absent. <ul style="list-style-type: none"> - Temporarily Absent Family Members—maximum number of days a member can be absent from the unit and still be considered a temporarily absent: <ul style="list-style-type: none"> - Absent Students - Absences Due to Placement in Foster Care - Absent Adult Family Member (Away from household due to employment)—maximum number of days a member can be absent from the unit and still be considered a temporarily absent: - Individuals Confined for Medical Reasons
63	46	Home Selection— (Centralized Waiting Lists)	No detailed reference in existing policy	<ul style="list-style-type: none"> PHA may offer units through the Home Selection Day process. Eligible families are invited to PHA to go on a site tour of available units and are then given the option to select from the units available based on the applicant's date and time of application. Offers will be made until all applicants participating in the Home Selection Day have selected a unit, have refused every unit available or there are no more units to offer. An applicant may reject up to 2 units without "good cause". If the applicant provides verifiable "good cause" for refusing a unit, the refusal will not count toward the allowable 2 unit refusal maximum. Applicants have 5 business days to provide proof of a "good cause" refusal. If proof is not provided in time, the refusal will count against the allowable 2 unit refusal maximum. Families on the 1st Available Unit list are offered units in accordance with the Home Selection process.
64	46-47	Unit Assignments (Site-based Waiting Lists, Transfers, Accessible Units)	Does not limit the number of No-good cause offers	<ul style="list-style-type: none"> Families are assigned to an available unit based on the family needs (bedroom size and unit type). If a family rejects the unit assignment, the application for housing assistance will be withdrawn from the waiting list(s). When a unit becomes available at a development, the next eligible applicant with the earliest application date/time (SBWL or 1st Available Unit Waiting List) is offered the unit. Applicants may refuse a unit offer if verification of a good cause refusal can be provided. Applicants who are housed in Public Housing will only be removed from the other Public Housing SBWL on which they have applications. Applicants housed in Public Housing will remain on PAPMC and AME Waiting Lists. If an applicant is housed in an AME or PAPMC site, the applicant will remain on the other

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65	47	Order of Unit Offers—Non-Accessible Units	Current policy does not provide detail about Unit Offers	<p>AME or PAPMC Waiting Lists as well as Public Housing Waiting List(s).</p> <ul style="list-style-type: none"> When a non-accessible unit becomes available for occupancy, unit offers will be made in the following order. If there are not families in a category that need the features of the unit (bedroom size and unit type), then the unit is offered to the first family in the next category. Offers are made within each category based on the family's date and time of application. <p>Transfers</p> <ol style="list-style-type: none"> Emergency Transfers Demolition/Disposition/Revitalization/Rehabilitation (Relocation) Transfers Transfers to make an accessible unit available to a disabled family Over/under Housed Transfers <p>New Admissions</p> <ol style="list-style-type: none"> Priority Admissions (Special Preference/Super Preference) Nursing Home Transition Initiative (NHTI) (Special program referral) Liberty Resources Incorporation Program (Special program referral) Good Neighbors Make Good Neighborhoods (Special Program referral) Site-based Waiting List/1st Available Unit Waiting List <ul style="list-style-type: none"> Units shown through Home Selection process. Applicants are allowed 2 No-Good Cause refusals. After the 2nd No-Good Cause" refusal the applicant is withdrawn from the waiting list. No limit on the number of unit offers if units are refused for Good Cause.
66	47-48	Good Cause Refusals	Included and revised	<ul style="list-style-type: none"> The proposed policy does not include the existence of lead-based paint in the unit as a Good Cause refusal Under Site-based Waiting Lists, this will no longer be considered a good cause for refusing a unit. An elderly family may decline an offer for designated housing. Such a refusal must not adversely affect the family's position on or placement on the Public Housing waiting list.
67	48	Unit Refusal without Good Cause	<p>Minimal reference to the how unit refusals without Good Cause are addressed:</p> <p>The applicant should be able to document that the hardship claimed is good cause for refusing an offer of housing. If good cause is verified, the refusal of the offer will not require that the applicant be dropped to the bottom of the waiting list or otherwise affect the family's position on the waiting list.</p>	<ul style="list-style-type: none"> The proposed policy outlines in detail how refusals without Good Cause are addressed: <ul style="list-style-type: none"> When an applicant rejects the final unit offer without good cause, PHA will remove the applicant's name from all Public Housing Waiting Lists and send notice to the family of such removal. For Home Selection, after the second (2nd) unit offer that is refused without good cause, the applicant's name is removed from all Public Housing Waiting List(s). In the case of Unit Assignment, any unit offers refused without good cause will result in withdrawing the applicant's name from all Public Housing Waiting List(s). The notice will inform the family of their right to request an informal hearing and the process for doing so. The applicant may reapply for assistance one (1) year after their removal if the Waiting List(s) is open. If the Waiting List(s) is not open, the applicant must wait to reapply until PHA opens the Waiting List(s).
68	48-49	Accessible Unit Offers	References in existing Reasonable Accommodation Chapter and revised	<ul style="list-style-type: none"> Includes Centralized Tracking System for Accessible Units plan for offering units: <ul style="list-style-type: none"> 1st—Current tenant of the same development or other PHA or AME sites who have a disabled family member requiring the features of the unit (including bedroom size) are made an offer 2nd—if there are no current tenant who have a disabled family member requiring the features of the unit (including bedroom size) at any of sites, eligible qualified applicants on the waiting list needing the accessible unit features are offered the unit

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				<ul style="list-style-type: none"> When there are no tenants or applicant families requiring the accessible features of the unit, including families who would be over-housed, PHA will offer the unit to a non-disabled applicant. If there is no current tenant or eligible applicant family that needs the accessible features of the unit or is willing to move to the available site and unit, an eligible applicant family that does not need the accessibility features of the unit will be offered the unit. When offering an accessible unit to an applicant family that does not have a disability requiring the accessibility features of the unit, PHA and AME's will require the applicant to sign a Lease Rider that requires the family to move to a non-accessible unit within thirty (30) days when either a current tenant or an applicant needs the features of the unit and there is another unit available for the non-disabled family. PHA <i>inventory</i> is defined as: <ul style="list-style-type: none"> Conventional and scattered site Public Housing owned and managed by PHA PHA mixed finance Public Housing units managed by Alternative Management Entities (AME)
7. Income and Adjusted Income				
69	53	Seasonal Income	Included and expanded	<ul style="list-style-type: none"> People in some occupations regularly work less than 12 months per year, i.e., school employees, agricultural workers and construction workers. To determine annual income for individuals who have seasonal income, PHA will use past actual income received or earned within the last 12 months of the determination date. PHA will request that the family provide documentation of current income for verification. Documentation may include, but is not limited to EIV, W-2 forms and tax returns.
70	53-54	Anticipating Annual Income	Included as "Annualized Income" and revised	<ul style="list-style-type: none"> The following language was add: <ul style="list-style-type: none"> If PHA is unable to determine annual income using current information because the family reports little to no income or because income fluctuates, PHA will average past actual income received or earned within the last 12 months before the determination date to calculate annual income.
71	54	Known Changes in Income	Not in existing policy	<ul style="list-style-type: none"> If PHA verifies an upcoming increase or decrease in income, annual income will be calculated by applying each income amount to the appropriate part of the 12-month period.
72	54	Using Up-Front Income Verification to Project Income	Not in existing policy	<ul style="list-style-type: none"> Language added concerning the use of UIV/EIV as a means for projecting income including how to determine income when comparing with family provided document. If not substantial difference, use the information from the source reporting the higher income. If substantial difference, PHA "...reserves the right to request additional verification information and use any other verification method in priority order to reconcile the difference."
73	54	Temporarily Absent Family Members Income	Included and revised	<ul style="list-style-type: none"> Generally an individual who is or is expected to be absent from the assisted unit for 183 total days per calendar year or less is considered temporarily absent and continues to be considered a family member. Generally an individual who is or is expected to be absent from the assisted unit for more than 183 total days per calendar year is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.
74	54	Working Family Deduction	Included and revised	<ul style="list-style-type: none"> In addition to the Heads of Household, Co-heads and Spouses who are full-time students are excluded are not eligible for the Working Family deduction.
75	55	Health Insurance Premium Deduction	Included and revised	<ul style="list-style-type: none"> Dental and vision care insurance premiums are included as deductible under this provision

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8. Rent				
76	56-57	Total Tenant Payment and Rent Simplification	Included and revised	<ul style="list-style-type: none"> Requirement for families who report zero income to document income every one hundred and twenty (120) days Revision of ceiling rent schedule with calculation based on a percentage of the HCV Fair Market Rent.
77	57	Annual Evaluation of Minimum Rent	The General Manager of Operations will make recommendations to annually evaluate rent simplification, and will report on rent simplification as part of the MTW Annual Report. The General Manager of Operations is directed to do all further things, which may be necessary or appropriate, to carry out the actions set forth to implement rent simplification and to carry out PHA's obligations under the MTW Agreement.	<ul style="list-style-type: none"> Policy replaces reference to General Manager of Operations: <ul style="list-style-type: none"> PHA will evaluate rent simplification and report rent simplification as part of MTW Annual Report
78	57	Minimum Rent Hardship Exemption	Included and revised	<ul style="list-style-type: none"> If a family's TTP is higher than the minimum rent, the family is not eligible for a hardship exemption. Proposed policy includes a list of situations that qualify for the hardship exemption: <ul style="list-style-type: none"> The family has lost eligibility for or is applying for an eligibility determination for a Federal, State The family would be evicted as result of the imposition of the minimum rent requirements; The income of the family has decreased because of changed circumstances, including loss of employment; A death in the family has occurred. In order to qualify under this provision, a family must describe how the death has created a financial hardship (e.g., because of funeral-related expenses or the loss of the family member's income). To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship and how the hardship has affected the family's ability to pay the minimum rent.
79	57-58	Determination of Rent Hardship Exemption	Included and revised	<ul style="list-style-type: none"> PHA defines temporary hardship as a hardship expected to last 90 days or less. Long term hardship is defined as a hardship expected to last more than 90 days
80	58	No Financial Hardship	Included and revised	<ul style="list-style-type: none"> PHA will require the family to repay the suspended amount within 30 calendar days of PHA's notice that a hardship exemption has not been granted.
81	58	Temporary Hardship	Included and revised	<ul style="list-style-type: none"> Suspension period defined as 90 days The following statement added with respect to family resuming payment of minimum rent: "<u>...must repay PHA the amounts suspended in accordance with PHA's repayment agreement policy</u>"
82	58	Long-Term Hardship	Minimal reference: <ul style="list-style-type: none"> PHA will determine whether to reinstate the minimum rent requirement, suspend the minimum requirement for a temporary period or <u>exempt the family from the minimum rent requirement.</u> 	<ul style="list-style-type: none"> Defines exemption from the requirement at "Long-Term Hardship" and includes the following: <ul style="list-style-type: none"> If PHA determines that the financial hardship is long-term, PHA will exempt the family from the minimum rent requirement for so long as the hardship continues. The exemption will apply from the first of the month following the family's request until the end of the qualifying hardship. When the financial hardship has been determined to be long-term, the family is not required to repay the minimum rent. Families approved for the exemption from minimum rent are required to recertify every one hundred and twenty (120) days. The hardship period ends when any of the following circumstances apply: <ul style="list-style-type: none"> The family's calculated TTP is greater than the minimum rent;

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				<ul style="list-style-type: none"> - For hardship conditions based on loss of income, the hardship condition will continue to be recognized until new sources of income are received to enable the family to pay at least the minimum rent. - When the minimum rent is suspended, the family share reverts to the highest of the remaining components of the calculated TTP. The example below demonstrates the effect of the minimum rent exemption. • Further, PHA will make a determination on the effective date of the reinstatement of the minimum rent requirement and the amount of back rent owed, if applicable.
83	58-59	Ceiling vs. Income-Based Rent—MTW	Policy indicates that families choose between ceiling rent and income based rent	<ul style="list-style-type: none"> • Indicates that the tenant will be required to pay the lower amount when comparing the ceiling rent to the income-based rent .
84	59-60	Utility Allowance Revisions	<ul style="list-style-type: none"> • PHA will review and revise any utility allowances provided to tenants to encourage energy conservation and utility cost savings • Person on ceiling rent are eligible for a utility allowance when the cost of utilities is not included in the rent. • No policy on hardship related to MTW utility revisions. 	<ul style="list-style-type: none"> • Additional language added to policy: <ul style="list-style-type: none"> - PHA will review its schedule of utility allowances annually based on an assessment of available HUD funding. PHA will subsequently apply the HUD-established operating subsidy proration factor to determine the actual utility allowance schedule. Future increases or decreases to the utility schedules will be dependent on both the changes to actual utility costs in Pennsylvania and changes to the HUD operating subsidy amounts received by PHA. • PHA shall give notice to all residents of proposed allowances and scheduled surcharges, and revisions thereof. The notice will be given in the manner provided in the lease and must: <ul style="list-style-type: none"> - Be provided at least sixty (60) days before the proposed effective date of the allowances, scheduled surcharges, or revisions. - Describe the basis for determination of the allowances, scheduled surcharges, or revisions, including a statement of the specific items of equipment and function whose utility consumption requirements were included in determining the amounts of the allowances and schedule of surcharges. - Notify residents of the place where PHA's documentation on which allowances and surcharges are based is available for inspection. - Provide all residents an opportunity to submit written comments during a period expiring not less than thirty (30) days before the proposed effective date of the allowances, scheduled surcharges, or revisions. • Changes become part of the lease and the resident is given a copy of the revised allowance schedule. • Adjustments to tenant payments as a result of such changes must be retroactive to the first day of the month following the month in which the last rate change taken into account in such revision became effective. • The tenant rent calculations must reflect any changes in PHA's utility allowance schedule. • Revised utility allowances will be applied to a family's rent calculations at the next scheduled recertification after the allowance is adopted or at one time across all affected households. The approach taken will be at the discretion of PHA. • Persons paying ceiling rent are not eligible for a utility allowance. • For all of PHA's utility allowance policies implemented pursuant to its MTW authority, PHA will consider exceptions to these policies on a case-by-case basis for families who can demonstrate a long term hardship will result from application of the policies to them, or as a reasonable accommodation. To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The

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				request must explain the nature of the hardship and how the application of the utility allowance policy to the family will affect the family.
85	60	Planned Utility Allowance Program	Not in existing policy	<ul style="list-style-type: none"> PHA intends to modify the utility allowance policy to require tenants receiving gas or electric utility allowances to enroll and participate in the Public Gas Works (PGW) Customer Responsibility Program (CRP), PECO Customer Assistance Plan, LIHEAP and any other applicable programs that offer reduced rates, energy usage grants or other financial incentives to low income households. The initial phase of the revised policy will require eligible households to participate in the Pennsylvania Gas Works (PGW) Customer Responsibility Program (CRP) and the Pennsylvania Electric Company (PECO) Customer Assistance Program (CAP). Participation in the PGW CRP program will place a cap on the amount of money that eligible residents will be required to pay for their gas utility payments. Payments by households under the CRP program are based on household income, not consumption. Participation in the PECO CAP program will provide a discount on electric heating and other electric rates for low-income households. The discount is based upon the gross income of the household.
86	60-61	Prorated Rent for Mixed Families	Not in existing policy	<ul style="list-style-type: none"> PHA will prorate the assistance provided to a mixed family. PHA will first determine TTP as if all family members were eligible and then prorate the rent based upon the number of family members that actually are eligible. To do this, PHA will: <ul style="list-style-type: none"> Subtract the TTP from a maximum rent applicable to the unit. The result is the maximum subsidy for which the family could qualify if all members were eligible. Divide the family maximum subsidy by the number of persons in the family to determine the maximum subsidy per each family member who is eligible (member maximum subsidy). Multiply the member maximum subsidy by the number of eligible family members. Subtract the subsidy calculated in the last step from the maximum rent. This is the prorated TTP. Subtract the utility allowance for the unit from the prorated TTP. This is the prorated rent for the mixed family. Revised Public Housing maximum rents will be applied to a family's rent calculation at the first annual recertification after the revision is adopted.
9.0 Verification				
87	63	Requirements for Acceptable Documents	<ul style="list-style-type: none"> Documents must be dated within 60 days from the date they are provided to PHA PHA maintains the validity of verification documents for 90 days from the date of receipt 	<ul style="list-style-type: none"> Revised policy to require that documents be dated within 90 calendar days of the date they are provided to PHA Revised to allow validity of verification documents for 120 days from the date of receipt. What this means is that when the recertification is processed in the computer system, the document cannot be more than 120 days old from the date the document was received by PHA.
88	63	Substantial Difference	<ul style="list-style-type: none"> Substantial difference is \$600/year 	<ul style="list-style-type: none"> Revised substantial difference in concert with industry standard to reflect \$200/month or \$2,400/year.
89	64	When a Substantial Difference Exists	<ul style="list-style-type: none"> Not in existing policy 	<ul style="list-style-type: none"> If difference between verifications sources is under the threshold for substantial difference PHA will use the information provided by the family. If the differences is at or exceeds the threshold, PHA will seek additional verification in order of the verification hierarchy
90	65-66	When Third Party Verification is not Required	<ul style="list-style-type: none"> Existing policy does not include these clauses 	<ul style="list-style-type: none"> PHA will accept certain original documents provided by the tenant from the third party and treat these submissions as third party verification. Examples include original bank statements, original pharmacy print outs, and original school transcripts.

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91	67	Verification of SS and SSI Benefit	<ul style="list-style-type: none"> Dept of Public Assistance, via third party written verification, provides verification of the State Supplementary Portion of the SSI benefit 	<ul style="list-style-type: none"> PHA obtains verification of the SSP through the Pennsylvania Department of Public Welfare (DPW) electronic database or the Pennsylvania Bulletin.
92	67	Verification of Unemployment	<ul style="list-style-type: none"> Policy provided for use of tenant benefit letter to verify unemployment benefits 	<ul style="list-style-type: none"> Policy revised to reflect use of EIV to verify unemployment benefits
93	67	Verification of Department of Public Assistance Benefits	<ul style="list-style-type: none"> Verification obtained through written third party 	<ul style="list-style-type: none"> Policy revised to reflect use of the Pennsylvania Dept of Public Welfare electronic database
94	68	Verification of Zero Income	<ul style="list-style-type: none"> Residents are required to re-verify zero income status once every 90 days 	<ul style="list-style-type: none"> Changed policy to require re-verification of zero income once every 120 days Included specific reporting requirements including zero income self certification, financial hardship worksheet and verification of no benefits from DPA, Family Court and EIV
95	69	Verification of SS Number and Date of Birth	<ul style="list-style-type: none"> Specific documents to verify SS number and DOB are not included 	<ul style="list-style-type: none"> Policy reflects documents which can be used to verify SS number and date of birth
96	69	Verification of Disability	<ul style="list-style-type: none"> Not in existing policy 	<ul style="list-style-type: none"> Included policy provisions to guide verification of disability requirements. If disability is apparent, no further verification is required Third party verification must be obtained to verify that the requested accommodation is consistent with the disability and that the accommodation is in fact needed. A doctor or other medical professional, a peer support group, a non-medical service agency, or a reliable third party who is in a position to know about the individual's disability may provide verification of a disability
10. Leasing and Inspections—2 Chapters combined into 1				
97	71	Lease Orientation	Does not exist in current policy	<ul style="list-style-type: none"> States that after unit acceptance, but prior to occupancy, will provide a lease orientation that the head of household or spouse is required to participate: <ul style="list-style-type: none"> When families attend the lease orientation, the following will be provided: <ul style="list-style-type: none"> A copy of the lease A copy of the pet policy A copy of Things You Should Know (HUD-1140-OIG) Topics to be discussed will include: <ul style="list-style-type: none"> Applicable deposits and other charges Review and explanation of lease provisions Unit maintenance and work orders PHA's reporting requirements Explanation of occupancy forms Grievance procedures
98	71-72	Execution of Lease	Included and revised	<ul style="list-style-type: none"> The lease must be executed by the Tenant and PHA, <u>except for automatic renewals of a lease.</u> The head of household will be provided a copy of the executed lease and PHA will retain a copy in the tenant's file. Files for households that include a live-in aide will contain file documentation signed by the live-in aide, that the live-in aide is not a party to the lease and is not entitled to PHA assistance. The live-in aide is

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99	72	Modifications to the Lease	Included in existing policy under different headings	<p>only approved to live in the unit while serving as the attendant for the specified tenant family member.</p> <ul style="list-style-type: none"> If a new household member is approved by PHA to reside in the unit, the person's name and birth date will be added to the lease. The head of household and PHA will be required to initial and date the change.
100	72-73	Modifications to the Lease Form	Not in existing policy	<ul style="list-style-type: none"> PHA may modify its lease from time to time. However, PHA will give tenants thirty (30) days advance notice of the proposed changes and an opportunity to comment on the changes. PHA will consider any comments before formally adopting the new lease. After proposed changes have been incorporated into the lease and approved by the Board, each family will be notified at least sixty (60) days in advance of the effective date of the new lease or lease revision. The family will have thirty (30) days to accept the revised lease. If the family does not accept the offer of the revised lease within that thirty (30) day timeframe, the family's tenancy will be terminated for other good cause in accordance with the Lease Termination policies outlined in this ACOP. When PHA proposes to modify or revise schedules of special charges or rules and regulations, PHA will post a copy of the notice in the central office, and will mail a copy of the notice to each tenant family. Documentation of proper notice will be included in each tenant file.
101	73	Security Deposits	Included and revised	<ul style="list-style-type: none"> The following provisions have been added: <ul style="list-style-type: none"> The amount of the security deposit will be equal to one month's rent OR \$99, whichever amount is lower. If the tenant transfers to another unit, PHA will transfer the security deposit to the new unit. The tenant will be billed for any maintenance or other charges due for the "old" unit. Pet Application fees will also transfer to the new unit. See this ACOP for additional information on PHA Pet Policy.
102	73-74	Rent Payments	Not in existing policy	<ul style="list-style-type: none"> Families must pay the amount of the monthly tenant rent determined by PHA in accordance with its policies. The lease specifies the initial amount of the tenant rent at the beginning of the initial lease term. The tenant rent is due and payable at a PHA-designated location on the first of every month. If the first falls on a weekend or holiday, the rent is due and payable on the first business day thereafter. All rental payments received by PHA from tenants must be applied to past charges before the current month's rent is credited. Payments must be applied using the "first-in, first out" (FIFO) method. The exception is maintenance related charges, which should not be credited until all other charges are paid in full using the FIFO method. If a family's tenant rent changes, PHA will notify the family of the new amount and the effective date by sending a "Notice of Rent Adjustment" which will become an attachment to the lease. When a check is returned for insufficient funds or is written on a closed account, the rent will be considered unpaid and a returned check fee of \$25.00 will be charged to the family. Rent payments that are "chronically" late, as defined in the PHA lease, will be grounds for lease termination. Rent that is late 3 or more times within a 12 month period is considered chronically late.
103	74	Late Fees and Non-payment	Not in existing policy Although not in ACOP, PHA currently charges a \$10 late fee	<ul style="list-style-type: none"> Expands current policy to include when rent is due, where to make payments, when late charges are do. Includes late fee of \$25 for late rent. Rent that is late 3 or more times within a 12 month period is considered chronically late.

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104	74	Excess Utility Charges	Excess utilities mentioned, but charges are not.	<ul style="list-style-type: none"> When applicable, families may be charged for excess utility usage according to PHA's current posted schedule. Nonpayment of excess utility charges is a violation of the lease and is grounds for eviction.
105	75	Unit Maintenance and Repairs	Not in existing policy	<ul style="list-style-type: none"> PHA will maintain dwelling units and the development in decent, safe and sanitary condition and make necessary repairs to dwelling units. Families are required to maintain the interior and exterior of the unit and common areas in a neat and orderly manner. It is the responsibility of the family to remove trash, garbage, rubbish and other waste in a sanitary and safe manner. In addition, families are responsible for removing ice and snow from the area immediately in front of their unit. Tenants who are unable to perform these tasks due to age or disability are exempt from these responsibilities. Failure to maintain the unit in a satisfactory manner shall be considered a breach of the Lease and can result in lease termination. Families are responsible for paying reasonable charges, including the cost of labor, for the repair of any damage beyond normal wear and tear to the unit or to appliances provided by PHA that are negligently or intentionally caused by the tenant, household members, live-in aides or guests. Maintenance and damage charges will be printed on the monthly rent statements until paid. If the family requests a grievance hearing within ten (10) days from the receipt of the maintenance charges, PHA may not take action for nonpayment of the charges until the conclusion of the grievance process.
106	75	Move-in Inspections	Included and revised	<ul style="list-style-type: none"> The revisions include a provision that requires the Head of Household or co-head to attend the initial inspection and sign the inspection form.
107	75	UPCS Inspections	Included and revised Currently states that emergency conditions will be abated within 24 hours	<ul style="list-style-type: none"> Revision changes the timeframe for abating emergency conditions to abatement in 24 hours and downgraded to urgent or routine Also includes a list of examples of emergency conditions.
108	76	Move-out Inspections	Included and revised	<ul style="list-style-type: none"> The Head of Household will join in such inspection, <u>unless the Head of Household is hospitalized or vacates without notice to PHA.</u> Also, no longer allows a representative to participate in the inspection on behalf of the tenant. If present, the Head of Household will sign the move-out inspection. PHA will notify the former Tenant within thirty (30) days of the move-out of any charges owed.
109	76	Notice of Non-emergency Entries	Brief statement included	<ul style="list-style-type: none"> Inspections will be conducted during business hours. Entry for repairs requested by the family will not require prior notice. Tenant-requested repairs presume permission for PHA to enter the unit. If no adult household member is present at the time of an emergency entry, PHA will leave a written statement showing the date, time and purpose of the entry prior to leaving the dwelling unit.
110	76	Scheduling Inspections/Unit Repairs	Not in existing policy	<ul style="list-style-type: none"> If a family needs to reschedule an inspection, the family must notify PHA at least 24 hours prior to the scheduled inspection. PHA will reschedule the inspection no more than twice unless the tenant has a verifiable good cause to delay the inspection. PHA may request verification of such cause. If upon the third (3rd) attempt to enter the unit, no adult household member is present, PHA will enter the unit to complete the repair or inspection.
111	77	Emergency Repairs	Emergency repairs, and items that endanger the	<ul style="list-style-type: none"> Generally the following are considered emergency conditions:

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			household's health and well being, will be corrected within twenty-four hours of discovery.	<ul style="list-style-type: none"> - Any condition that jeopardizes the security of the unit - Major plumbing leaks or flooding, waterlogged ceiling or floor in imminent danger of falling - Natural or LP gas or fuel oil leaks - Any electrical problem or condition that could result in shock or fire - Absence of a working heating system when outside temperature is below 60 degrees Fahrenheit. - Utilities not in service, including no running hot water - Conditions that present the imminent possibility of injury - Obstacles that prevent safe entrance or exit from the unit - Absence of a functioning toilet in the unit - Inoperable smoke detectors • If the unit is damaged to the extent that conditions are created which are hazardous to the life, health, or safety of the occupants, the tenant must immediately notify PHA of the damage. • When conditions in the unit are hazardous to life, health, or safety, PHA will abate the emergency situation within 24 hours and downgrade to urgent or routine.
112	77	Non-emergency Repairs	PHA requires non-emergency repairs to be completed within 25 days after notification	<ul style="list-style-type: none"> • PHA will correct non-life threatening health and safety defects within thirty-five (35) business days of the inspection date.
113	77-78	Outcomes for Failed Housekeeping Inspections	Not in existing policy	<ul style="list-style-type: none"> • Tenants whose housekeeping habits pose a non-emergency health or safety risk, encourage insect or rodent infestation, or cause damage to the unit are in violation of the lease. In these instances, PHA will provide proper notice of a lease violation. • A re-inspection will be conducted within thirty (30) days to confirm that the tenant has complied with the requirement to abate the problem. Failure to abate the problem or allow for a re-inspection is considered a violation of the lease and may result in termination of tenancy in accordance with this ACOP. • Notices of lease violation will also be issued to tenants who purposely disengage the unit's smoke detector. Only one warning will be given. A second incidence will result in lease termination.
114	78	PHA Responsibilities	Items which endanger resident, health and wellbeing will be corrected within 24-hours after notification.	<ul style="list-style-type: none"> • Items which endanger tenant, health and wellbeing will be abated within 24 hours and downgraded to urgent or routine.
11. Continued Occupancy				
115	79	Overview	Included and revised	<ul style="list-style-type: none"> • PHA is required to monitor each family's income and composition over time, and to adjust the family's rent accordingly. Policies governing reasonable accommodation, family privacy, required family cooperation and program abuse, as described elsewhere in this ACOP, apply to regular and interim recertifications. PHA is required to obtain information needed to conduct recertifications. Families are required to provide current and accurate information on income, assets, allowances and deductions, family composition and community service compliance as part of regular the Recertification process.
116	79	Required Information	List of required information summarized into general statement	<ul style="list-style-type: none"> • PHA is required to obtain information needed to conduct recertifications. Families are required to provide current and accurate information on income, assets, allowances and deductions, family composition and r compliance as part of the recertification process. For all tenants of Public Housing, PHA must conduct a review of community service requirement compliance during every regular recertification.
117	79-80	Scheduling Recertifications	Ninety (90) to one hundred and twenty (120) days prior to the scheduled recertification date, PHA will provide written notification to residents with the scheduled date	<ul style="list-style-type: none"> • Timeframe for beginning the process changed to "approximately 120 days..." • Scheduled recertification date referred to as Anniversary date • Anniversary date described as the first day of the month in which the lease is signed for the unit. For

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			and time of the recertification interview.	<p>example, a tenant moving into a particular unit on March 15, 1999 has an anniversary date for that same unit of March 1.</p> <ul style="list-style-type: none"> • If the family transfers to a new unit, PHA will perform a new recertification, and the anniversary date will be changed accordingly. • PHA may also schedule a recertification for completion prior to the anniversary date for administrative purposes.
118	80	Notification of and Participation in the Recertification Process	Not in existing policy	<ul style="list-style-type: none"> • Families generally are required to participate in a Recertification interview, which must be attended by the head of household, spouse, and/or co-head and all additional household members 18 years of age and older. If participation in an in-person interview poses a hardship because of a family member's disability, the family should contact PHA to request a reasonable accommodation. • Notification of Recertification interviews will be sent by mail and will contain the date, time, and location of the interview. In addition, it will inform the family of the information and documentation that must be brought to the interview. • If the family is unable to attend a scheduled interview, the family should contact the appropriate PHA management office in advance of the interview to schedule a new appointment. In all circumstances, if a family does not attend the scheduled interview PHA will send a second notification with a new interview appointment time. • If a family fails to attend two scheduled interviews without PHA approval, the family will be in violation of their lease and may be terminated in accordance with the continued occupancy policies, • An advocate, interpreter, or other assistant may assist the family in the interview process.
119	80-81	Conducting Recertifications	Included and expanded.	<ul style="list-style-type: none"> • Any required documents or information that the family is unable to provide at the time of the interview must be provided within 10 business days of the interview. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the family does not provide the required documents or information within the required time frame (plus any extensions), the family will be in violation of their lease and may be terminated in accordance with this ACOP. • Unless the family reports a change, or PHA has reason to believe a change has occurred in information previously reported by the family, certain types of information that are verified at admission typically do not need to be re-verified on an annual basis. These include: <ul style="list-style-type: none"> - Legal identity - Age - Social security numbers - Citizenship or immigration status
120	81	Change in Unit Size	Policy references that PHA will validate unit size requirement included, but does not mention that the result of a change may be a transfer.	<ul style="list-style-type: none"> • Changes in family or household composition may make it appropriate to consider transferring the family to comply with occupancy standards. PHA may use the results of the Recertification to require the family to move to an appropriate size unit. Policies related to such transfers are located in this ACOP.

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121	81	Criminal Background Checks	Not in existing policy as recertification requirement	<ul style="list-style-type: none"> • New requirement that all household members 16 years old or older will be required to execute consent form for criminal background check: <ul style="list-style-type: none"> - Each household member aged 18 years and older will be required to execute a consent form for a criminal background check as part of the Recertification process. Information obtained through criminal background checks may be used for lease enforcement and eviction. - An outstanding warrant check and certification of "No Criminal Activity" will be required for all household members 18 years of age or older and will generally be performed at each regular recertification. All tenants determined not suitable and/or ineligible have a right to a hearing to present extenuating circumstances and have a right to legal representation. - If the criminal background check identifies a pending criminal investigation, PHA will defer a termination decision for existing participants until the case is decided. - PHA reserves the right to conduct additional certifications of "No Criminal Activity" to maintain the integrity of the program.
122	81-82	Effective Dates (Scheduled Recertifications)	Not in existing policy	<ul style="list-style-type: none"> • Outlines when Increases and decreases of rent will be effective. • Increases in Rent <ul style="list-style-type: none"> - The increase generally will be effective on the first of the month following 30 days' notice to the family. - If less than 30 days remain before the scheduled effective date, the increase will take effect on the first of the month following the end of the 30-day notice period. - If the family causes a delay in processing the Recertification, increases in the family share of the rent will be applied retroactively, to the scheduled effective date of the Recertification. The family will be responsible for any underpaid rent and may be offered a repayment agreement at the discretion of PHA. • Decreases in Rent <ul style="list-style-type: none"> - The decrease will be effective on the first day of the month following the month in which the change was reported. In cases where the change cannot be verified until after the date the change would have become effective, the change will be made retroactively. If the family causes a delay in processing the Recertification, decreases in the family share of the rent will be applied prospectively, from the first day of the month following completion of the Recertification processing. • Defines what a delay in recertification processing: <ul style="list-style-type: none"> - A delay in recertification processing is defined as any delay considered to be caused by the family if the family fails to provide information requested by PHA by the date specified, and/or fails to attend scheduled recertification interviews without good cause, and this delay prevents PHA from completing the Recertification as scheduled.
123	82-83	Interim Recertification	Included, revised and expanded	<ul style="list-style-type: none"> • When an interim recertification is conducted, only those factors that have changed are verified and adjusted. • If someone 18 years of age or older is added to the household between scheduled recertifications, only

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				<p>the new member's income will be verified as part of the interim recertification.</p> <ul style="list-style-type: none"> • Only the Head of Household has to sign the ACO. • When an interim recertification is conducted, only those factors that have changed are verified and adjusted and will require families to complete both the PHA and HUD Authorization for Release of Information. • During an interim recertification PHA will apply the Utility Allowance in effect at the last regular recertification
124	83	Interim Recertification—Temporary and Sporadic Income	Temporary or Sporadic Income: Households with income that is temporary or sporadic in nature and therefore cannot be projected with reasonable accuracy for a long period of time will be required to have their income re-examined every 90 days.	<ul style="list-style-type: none"> • Clarifies how Temporary and Sporadic Income are addressed: <ul style="list-style-type: none"> - Income is excluded from calculation of annual income - Adult household member when no other source of income is subject to zero income verification and recertification requirements • As stated in the Verification Chapter, recertifications for Zero income will take place every 120 days.
125	83	Interim Recertification—Zero Income	Included with detail provided in Verification Chapter <ul style="list-style-type: none"> • States a 90 day verification requirement 	<ul style="list-style-type: none"> • Applicable adult household members who are subject to the 120 day zero income verification requirement are required to report any and all changes in income or benefits between 120 day recertification periods. Once a change in income or benefits is reported, the adult household member is no longer subject to the 120 day zero income verification requirement. The "Verification of Zero Income" section in the Verification chapter includes specific policy guidance on this subject.
126	83	Interim Recertification—Other	Not in existing policy	<ul style="list-style-type: none"> • If at the time of regular recertification, resident-provided documents were used on a provisional basis due to the lack of third-party verification, and third-party verification becomes available, PHA will conduct an interim recertification if the difference in income is greater than \$2,400/year. • PHA may conduct an interim recertification at any time in order to correct an error in a previous recertification, or to investigate a resident fraud complaint. • If a family reports a decrease in income from the loss of welfare benefits due to fraud or non-compliance with a welfare agency requirement to participate in an economic self-sufficiency program, the family's share of the rent will not be reduced.
127	83-84	Interim Recertification—Changes in Family Household Composition	Included revised and expanded <ul style="list-style-type: none"> • Families are required to report to PHA, within 15 calendar days, any changes in family composition which may occur between regularly scheduled recertifications. 	<ul style="list-style-type: none"> • Families will have to report changes in household composition within 30 days of occurring when it happens between regular recertifications. • The following policies expand the existing policy: <ul style="list-style-type: none"> - Changes in family or household composition may make it appropriate to consider transferring the family to comply with occupancy standards. Policies related to such transfers are located in this ACOP. Any income and/or deduction changes resulting from the composition change will be considered as well. • PHA may approve an addition to the household if: <ul style="list-style-type: none"> o The new member is a minor member of a current member of the household; - The new member is a minor member of the immediate family who is added as a result of birth, adoption or court awarded custody; - The new member is a person for whom the head of household can prove legal guardianship; - The additional member is a person for whom the head of household can prove a marital or interdependent relationship; - There is sufficient program funding. • When any new family member is added to the household, PHA will conduct an interim recertification to

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				<p>determine any new income or deductions associated with the additional family member.</p> <ul style="list-style-type: none"> Families must notify PHA in writing if any family member no longer lives in the unit. PHA must review and if applicable, approve all changes to the family composition. Requests to accommodate additional household members based on health-related reasons must be verified by a doctor/medical professional and/or social service professional. If a change in household composition results in an over/under crowding situation, PHA may initiate an Occupancy Standards transfer in accordance with the agency Transfer Policies found in this ACOP.
128	84-85	Household Member Turning 18 Between Recert Interview & Recert Effective Date	Not in existing policy	<ul style="list-style-type: none"> Income <ul style="list-style-type: none"> When a household member will turn 18 between the date of recertification interview, but on or before the effective date of the recertification, PHA will include the household member's income in the calculation of annual income. For example, a household has a recertification effective date of November 1st. One of the household members, at the recertification interview on September 1st is still 17, but will turn 18 on September 30th, PHA will calculate the income of that household member as if he/she was an adult, since the household member will be 18 by the effective date of the recertification. Release Forms <ul style="list-style-type: none"> When a household member will turn 18 between the date of recertification interview, but on or before the effective date of the recertification, PHA will have a parent/legal guardian sign any consent/release forms on behalf of that household member in order to authorize PHA to obtain their income verification. Criminal Background Check <ul style="list-style-type: none"> When a household member will turn 18 between the date of recertification interview, but on or before the effective date of the recertification, PHA will have a parent/legal guardian sign the consent for criminal background check on behalf of that household member in order to authorize PHA's criminal background check. Subsequent Recertifications and Background Checks <ul style="list-style-type: none"> After the recertification effective date, if PHA wishes to complete verifications or background checks on a household member who was not 18 at the recertification interview but who has now turned 18, PHA will obtain that household member's signature on any required release form before conducting any type of verification or background check. If no other verifications or background checks are completed between regularly scheduled recertifications, PHA will wait until the next regular recertification to obtain the executed release forms from the household member who had turned 18 between the regularly scheduled recertifications.
129	85	New Family Members Not Requiring Approval	Included in existing policy without the time-frame for notifying PHA	<ul style="list-style-type: none"> The family must inform PHA of the birth, adoption or court-awarded custody of a child within thirty (30) calendar days of the event.
130	85	New Family and Household Members Requiring Approval	Included and expanded	<ul style="list-style-type: none"> Added timeframe for determining if a person has exceeded the guest limit and requires PHA approval to be added to the lease. <ul style="list-style-type: none"> "...expected to stay in the unit for more than 30 consecutive days, or 90 cumulative days, within a twelve month period, and therefore no longer qualifies as a "guest." Requests must be made in writing and approved by PHA prior to the individual moving in the unit."

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				<ul style="list-style-type: none"> Additional policies include: <ul style="list-style-type: none"> PHA will not approve the addition of a new family or household member unless the individual meets PHA's eligibility criteria. PHA will not approve the addition of a foster child, foster adult or kinship care child if it will result in the need for a larger unit according to PHA occupancy standards. PHA will not approve the addition of other adult household members other than by reason of marriage or interdependent relationship. PHA may grant exceptions to this policy as a reasonable accommodation for a person with disabilities. If PHA determines an individual meets PHA's eligibility criteria, PHA will provide written approval to the family.
131	85-86	Departure of a Family or Household Member	Not in existing policy	<ul style="list-style-type: none"> If a household member ceases to reside in the unit, the family must inform the PHA within 30 calendar days. This requirement also applies to a family member who has been considered temporarily absent at the point that the family concludes the individual is permanently absent. If a live-in aide, foster child, or foster adult ceases to reside in the unit, the family must inform PHA within 30 calendar days.
132	86	Processing Interim Recertifications	Included and expanded	<ul style="list-style-type: none"> The family must submit any required information or documents within 10 business days of receiving a request from the PHA. This time frame may be extended for good cause with PHA approval. PHA will accept required documentation by mail, by fax, or in person.
133	86	Changes in Utility Allowance	Not in existing policy	<ul style="list-style-type: none"> Changes in utility allowances will be applied at the next scheduled recertification after the change or at one time across all affected households. The approach taken will be at the discretion of PHA.
134	86	Changes in Ceiling Rent	PHA may ..., at its discretion, apply the increases in phases to minimize the impact on residents.	<ul style="list-style-type: none"> Changes in ceiling rents will be applied at the next scheduled recertification after the change or at one time across all affected households. The approach taken will be at the discretion of PHA.
135	86	Notification of New Tenant Rent	<p>PHA will notify the family in writing of any change in the Family Rent, and state the reasons.</p> <p>PHA will give the family an opportunity to request an informal hearing or grievance on the matter.</p>	<ul style="list-style-type: none"> The notice to the family will include the current family composition and income amounts that were used to calculate the tenant rent
136	86	Discrepancies	Included and expanded	<ul style="list-style-type: none"> Expanded policy found in Program Integrity chapter—see Sub-heading “PHA-Caused Errors or Program Abuse”
137	86-87	Family Absence From the Unit	Included and revised	<ul style="list-style-type: none"> Limit on time family may not be absent from the unit changed from 183 consecutive calendars to 183 calendar days. If a family is absent from the Public Housing unit for more than 183 calendar days, and the family does not adequately verify that they are living in the unit; PHA will terminate the lease for other good cause.
138	88	Guests	<p>Guests who stay less than 14 consecutive days need not be reported to or approved by the Asset Manager.</p> <p>Guests, who stay more than 14 consecutive days and up to a maximum of 30 days per calendar year, require the written permission of the Asset Manager. Permission shall not be unreasonably withheld. Guests who stay</p>	<ul style="list-style-type: none"> Changes allowable timeframe that a guest may stay without approval to no longer than 30 consecutive days or 90 cumulative days during a 12-month period. Guests who represent the unit address as their residence address for receipt of benefits or other purposes will be considered unauthorized occupants. In addition to requiring documentation as part a tenant's to request for an exception to a guest to stay beyond the established timeframe, the tenant must also provide documentation of the residence to which the guest will return.

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			<p>between 14 consecutive days to a maximum of 30 days per calendar year are permitted, provided their stay is reported to the Asset Manager within 72 hours of arrival and authorized by the Asset Manager.</p> <p>Guests of more than 30 calendar days shall be authorized by the Asset Manager with advance documentation of extenuating circumstances.</p>	<ul style="list-style-type: none"> Children who are subject to a joint custody arrangement or for whom a family has visitation privileges, that are not included as a family member because they live outside of the assisted household more than 50 percent of the time (at least 183 days/year), are not subject to the time limitations of guests as described above.
139	88	Notice of Move or Intent to Vacate	Included and expanded	<ul style="list-style-type: none"> The family must submit a signed Notice of Intent to Vacate Form and return the keys to the Management Office prior to vacating the unit. Failure to do so will result in the continuation of rental charges. Families who fail to return the keys will be charged a fee for the cost of replacing the door locks and keys. Such fees will be included in the schedule of maintenance charges. The family must pay any outstanding balances owed to PHA at the time the unit is vacated. If the outstanding balance is not paid within one month after the family vacates the unit, the unpaid balance will be collected through a third party collection agency.
12. Pets				
140	90	Assistive Animals	Definition included and policy expanded	<ul style="list-style-type: none"> Assistive Animals – often referred to as “service animals,” “assistance animals,” “support animals,” or “therapy animals” – perform many disability-related functions, including but not limited to the following: <ul style="list-style-type: none"> - Guiding individuals who are blind or have low vision - Alerting individuals who are deaf or hearing impaired - Providing minimal protection or rescue assistance - Pulling a wheelchair - Fetching items - Alerting persons to impending seizures - Providing emotional support to persons with disabilities who have a disability-related need for such support Assistive Animals that are needed as a reasonable accommodation for persons with disabilities are not considered pets, and thus, are not subject to PHA’s pet policies described in this ACOP.
141	90-91	Approval of Assistive Animals	Included and expanded	<ul style="list-style-type: none"> A reasonable accommodation requires that there is a relationship between the person’s disability and the person’s need for the animal.
142	91	Care and Handling of Assistive Animals	Not in existing policy	<ul style="list-style-type: none"> This subsection applies to assistive animals only. Residents must care for assistive animals in a manner that complies with State and local laws, including anti-cruelty laws. Residents must ensure that assistive animals do not pose a direct threat to the health or safety of others, or cause substantial physical damage to the development, dwelling unit, or property of other residents. When a resident’s care or handling of an assistive animal violates these policies, PHA will consider whether the violation could be reduced or eliminated by a reasonable accommodation. If PHA determines that no such accommodation can be made, PHA may withdraw the approval of a particular assistive animal.
143	91	“Pet” Defined	A domesticated animal of a species that is commonly	<ul style="list-style-type: none"> Turtles removed from listing in accordance with existing policy to restrict reptiles.

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			<p>kept as a household pet in the community, such as a cat, dog, canary, turtle, or tropical fish.</p> <p>Livestock, reptiles, amphibians, rodents, birds of prey, tropical birds/animals, insects, arachnids and poisonous fish will not be permitted.</p>	<ul style="list-style-type: none"> The following language is added: <ul style="list-style-type: none"> It is traditionally recognized as a companion animal and is kept in the home for pleasure rather than commercial purposes.
144	91-92	Pet Restrictions	Included with additional language	<ul style="list-style-type: none"> The following additional restriction has been added: <ul style="list-style-type: none"> Ferrets or other animals whose natural protective mechanisms pose a risk to small children of serious bites or lacerations.
145	92-93	Application and Registration of Pets	Included and revised	<ul style="list-style-type: none"> Policy revised to include the additional information for completing and application: <ul style="list-style-type: none"> Completed application form Basic information about the pet, including but not limited to, name, weight and age. In the event the pet owner has obtained a permanent license, a copy of the microchip number or tattoo must be provided. Certification that dogs and cats over two (2) months of age have been neutered or spayed. In the case of dogs and cats under two (2) months old, certification must be provided within thirty (30) days of the pet reaching two (2) months of age. Exceptions may be made upon veterinary certification that subjecting this particular pet to the procedure would be temporarily or permanently medically unsafe or unnecessary. Designation of two responsible parties for the care of the pet if the health or safety of the pet is threatened by the death or incapacity of the pet owner, or by other factors that render the pet owner unable to care for the pet. Pets will not be approved to reside in a unit until completion of the application process and all related requirements are met.
146	93	Non-refundable Application Fee	Included and revised	<ul style="list-style-type: none"> Removed "grandfather " clause allowing for an installment plan for paying the application fee The application fee is not part of the rent payable by the resident.
147	93	PHA Refusal to Register Pets	Included with additional language and revision	<ul style="list-style-type: none"> The following items reflect additions/or revisions to the existing policy: <ul style="list-style-type: none"> The pet owner fails to provide complete pet registration information, or fails to update the registration as required. The applicant has previously been charged with animal cruelty under local/State law; or has been evicted, had to relinquish a pet or been prohibited from future pet ownership due to pet rule violations or a court order. The pet's temperament and behavior may be considered as a factor in determining the pet owner's ability to comply with provisions of the lease. Added resident's right to appeal in accordance with PHA grievance procedures
148	94	Pet Agreement	Not in existing policy	<ul style="list-style-type: none"> Residents who have been approved to have a pet must enter into a pet agreement with PHA, or the approval of the pet will be withdrawn. The pet agreement is the resident's certification of receipt of a copy of PHA's pet policy and applicable House Rules, that the resident has read the policies and/or rules, and understands and agrees to comply with the polices and/or rules. The resident further certifies by signing the pet agreement that he or she understands that

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				noncompliance with PHA's pet policy and applicable House Rules may result in the withdrawal of PHA approval of the pet or termination of tenancy.
149	94	Number of Pets	Included with additional language	<ul style="list-style-type: none"> In the case of fish, residents may keep no more than can be maintained in a safe and healthy manner in a tank holding up to 20 gallons. Such a tank or aquarium will be counted as 1 pet.
150	94-95	Ongoing Certifications and Reporting	Requires annual update based on items required at initial request.	<ul style="list-style-type: none"> Reflects a more detailed requirement, including the provision of information more often than annually if it changes. <ul style="list-style-type: none"> Completed annual update form Includes a listing of persons designated as responsible parties for the care of the pet in the event the owner can no longer take care of the pet; A copy of any applicable licenses—annual dog license issued by the City must be provided to PHA. In the event the pet owner has obtained a permanent license, a copy of the microchip number or tattoo must be provided. Contact information for the pet's attending veterinarian, including name, address and telephone number (if applicable); and Provide (if the resident file of an approved pet owner does not already have) proof of: <ol style="list-style-type: none"> dog or cat being spayed/neutered or certification from a veterinarian stating that subjecting this particular pet to the procedure would be temporarily or permanently medically unsafe or unnecessary; required inoculations and vaccinations; and pet not having a communicable disease and being pest free
151	95	Pet Area Restrictions	Included with additional language	<ul style="list-style-type: none"> Pets are not permitted in common areas including lobbies, community rooms and laundry areas except for those common areas which are entrances to and exits from the building. Pet owners are not permitted to exercise pets or permit pets to deposit waste on development premises outside of the areas designated for such purposes.
152	95	Cleanliness	Included with additional language	<ul style="list-style-type: none"> Litter box requirements: <ul style="list-style-type: none"> Pet owners must promptly dispose of waste from litter boxes and must maintain litter boxes in a sanitary manner. Litter boxes shall be kept inside the resident's dwelling unit.
153	96	Noise	Included with additional language	<ul style="list-style-type: none"> This includes, but is not limited to loud or continuous barking, howling, whining, biting, scratching, chirping, or other such activities.
154	96	Responsible Parties	Existing mentions the need for a Designated Caretaker, but does not include the requirements for proving the information to PHA and the Caretaker responsibilities	<ul style="list-style-type: none"> A resident who cares for another resident's pet must be listed as a designated person for the care of that pet, must notify PHA and sign a statement that they agree to abide by all of the pet rules.
155	96	Pets Temporarily on the Premises	Included with additional language	<ul style="list-style-type: none"> Residents are prohibited from feeding or harboring stray animals. This rule does not apply to assistive animals. Residents may not temporarily care for pets of friends or relatives in their units unless they have been designated by the pet owner on the application for pet ownership as a responsible party for the care of the pet.
156	96-97	Additional Rules	Included without language naming the additional pet ownership restrictions that residents of a site may adopt	<ul style="list-style-type: none"> These additional development restrictions will be a part of the development House Rules.

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157	97	Pet Rule Violations	Included with additional language	<ul style="list-style-type: none"> All complaints of cruelty and all dog bites will be referred to local/State animal control or an applicable agency for investigation and enforcement.
158	97-98	Violation Notice	Not in existing policy	<ul style="list-style-type: none"> The notice will contain a brief statement of the factual basis for the determination and the pet rule(s) that were violated. The notice will also state: <ul style="list-style-type: none"> That the pet owner has ten (10) business days from the effective date of the service of notice to correct the violation or make written request for a meeting to discuss the violation That the pet owner is entitled to be accompanied by another person of his or her choice at the meeting That the pet owner's failure to correct the violation, request a meeting, or appear at a requested meeting may result in initiation of procedures to remove the pet, or to terminate the pet owner's tenancy
159	98	Notice for Pet Removal	Not in existing policy	<ul style="list-style-type: none"> If the pet owner and PHA are unable to resolve the violation at the meeting or the pet owner fails to correct the violation in the time period allotted by PHA, PHA may serve a notice to remove the pet. The notice will contain: <ul style="list-style-type: none"> A brief statement of the factual basis for PHA's determination of the pet rule that has been violated The requirement that the resident /pet owner must remove the pet within 30 calendar days of the notice A statement that failure to remove the pet may result in the initiation of termination of tenancy procedures
160	98	Pet Removal	Not in existing policy	<ul style="list-style-type: none"> If the death or incapacitation of the pet owner threatens the health or safety of the pet, or other factors occur that render the owner unable to care for the pet, the situation will be reported to the responsible party designated by the pet owner. If the responsible party is unwilling or unable to care for the pet, or if PHA after reasonable efforts cannot contact the responsible party, PHA may contact the appropriate State or local agency and request the removal of the pet.
161	98	Termination of Tenancy	Included but without general language governing the initiation of termination of tenancy	<ul style="list-style-type: none"> PHA may initiate procedures for termination of tenancy based on a pet rule violation if: <ul style="list-style-type: none"> The pet owner has failed to remove the pet or correct a pet rule violation within the time period specified. The pet rule violation is sufficient to begin procedures to terminate tenancy under terms of the lease.
162	98	Emergencies	Not in existing policy	<ul style="list-style-type: none"> PHA will take all necessary steps to ensure that pets who become vicious, display symptoms of severe illness, or demonstrate behavior that constitutes an immediate threat to the health or safety of others, are immediately removed from the premises by referring the situation to the appropriate State or local entity authorized to remove such animals. If it is necessary for PHA to place the pet in a shelter facility, the cost will be the responsibility of the pet owner. If the pet is removed as a result of any aggressive act on the part of the pet, the pet will not be allowed back on the premises.
163	98-99	Charges for Pet-Related Damages During Occupancy	Included with additional language	<ul style="list-style-type: none"> If the resident is in occupancy when such costs occur, the resident shall be billed for such costs in accordance with this ACOP. Charges for pet-related damage are not part of rent payable by the resident.

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164	99	Pet Waste Removal Charge	Included with additional language	<ul style="list-style-type: none"> Notices of pet waste removal charges will be in accordance with requirements regarding notices of adverse action. Charges are due and payable upon receipt. If the family requests a grievance hearing within the required timeframe, PHA may not take action for nonpayment of the charge until the conclusion of the grievance process. Charges for pet waste removal are not part of rent payable by the resident.
13. Community Service				
165	100	Overview	Not in existing policy	<ul style="list-style-type: none"> In the event that HUD stays this requirement, this policy will be suspended, in accordance with any applicable HUD guidelines until HUD otherwise notifies PHA
166	100	Requirements	Not in existing policy	<ul style="list-style-type: none"> Individuals who have special circumstances which they believe will prevent them from completing the required community service hours for a given month, must notify PHA in writing. PHA will review the request and notify the individual, of its determination. PHA may require those individuals to provide documentation to support their claim.
167	102	Work Activities	Acknowledges work as the only "work activity" exempt from the Community Service/Self Sufficiency requirement	<ul style="list-style-type: none"> Includes list of "work activities" that are exempt for the Community Service/Self-Sufficiency requirement
168	102-103	Notification	At lease execution or re-certification, all adult members (18 or older) of a public housing are provided with the Community Service requirement.	<ul style="list-style-type: none"> Language added that PHA will provide each family with: <ul style="list-style-type: none"> a written description of the community service requirement, the process for claiming status as an exempt person, the process for PHA verification of exempt status; and notification of the family of PHA's determination identifying the family members who are subject to the service requirement, and the family members who are exempt
169	103	Determination of Exemption Status and Compliance	<p>Verification required at lease execution and recertification (persons 62 and older do not have to verify exemption after initial lease-up)</p> <p>Exempt individuals must also sign a certification that they have received and read the policy and understand that if they are not exempt, failure to comply with the Community Service/Self-sufficiency requirement will result in non-renewal of their lease.</p>	<ul style="list-style-type: none"> Additional language added that persons 62 years old or older do not have verify exemption after initial exemption is confirmed At least sixty (60) days prior to lease renewal, a family will be requested to submit documentation that will enable PHA or its designee to (1) verify the exemption status of adult family members or (2) verify that all non-exempt family members have complied with the service requirement. The family will have ten (10) business days to submit PHA-required documentation form(s). PHA or its designee will review and verify the exemption status of all adult family members. This verification will only be done on an annual basis Upon completion of the verification process, PHA will notify the family of its determination in accordance with this ACOP.
170	103	Documentation and Verification of Exemption Status	At lease execution or recertification, all adult members or a public housing resident family must provide documentation that they will qualify for an exemption.	<ul style="list-style-type: none"> PHA must retain reasonable documentation of service requirement performance or exemption in tenant files. All family members who claim they are exempt from the community service requirement will be required to sign the Community Service Exemption Certification Form. PHA will provide a completed copy to the family and will keep a copy in the tenant file. PHA will verify that an individual is exempt from the community service requirement by following the verification hierarchy and documentation requirements found in this ACOP. PHA makes the final determination whether or not to grant an exemption from the community service

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171	103	Documentation and Verification of Compliance	Not in existing policy	<p>requirement. If a tenant does not agree with PHA's determination, the tenant can dispute the decision</p> <ul style="list-style-type: none"> Each individual who is subject to the community service requirement will be required to self certify that they are in compliance with the community service requirements at the time of regular recertification. Generally, families will be required to submit the self certification to PHA, at the regular recertification interview. PHA will not conduct further verification, unless PHA has reason to believe there is fraudulent reporting. If PHA has reasonable cause to believe that the certification provided by the family is false or fraudulent, PHA has the right to require third-party verification.
172	103-104	Initial Noncompliance	Not in existing policy	<ul style="list-style-type: none"> Violation of the service requirement is grounds for nonrenewal of the lease at the end of the lease term, but not for termination of tenancy during the course of the lease term. If the tenant or another family member has violated the community service requirement, PHA may not renew the lease upon expiration of the lease term, unless the tenant and any other noncompliant family member enter into a written agreement with PHA. Under this agreement the tenant or noncompliant family member must agree to cure the noncompliance by completing the additional hours of community service or economic self-sufficiency needed to make up the total number of hours required, over the new lease term. In addition, all other members of the family who are subject to the service requirement must be currently complying with the service requirement or must no longer be residing in the unit.
173	104	Notice of Initial Noncompliance	Not in existing policy	<ul style="list-style-type: none"> If PHA determines that there is a family member who is required to fulfill a service requirement, but who has failed to comply with this obligation (noncompliant tenant), PHA shall notify the tenant of this determination. The notice to the tenant must briefly describe the noncompliance. The notice will state that PHA will not renew the lease at the end of the lease term unless the tenant, and any other noncompliant tenant, enter into a written agreement with PHA to cure the noncompliance, or the family provides written assurance satisfactory to PHA that the tenant or other noncompliant tenant no longer resides in the unit. The family will have ten (10) business days from the date of the notice of noncompliance to enter into a written agreement to cure the noncompliance over the new lease term, provide documentation that the noncompliant tenant no longer resides in the unit, or to request a grievance hearing. If the family reports that a noncompliant family member is no longer residing in the unit, the family must provide documentation that the family member has actually vacated the unit before PHA will agree to continued occupancy of the family. Documentation must consist of a certification signed by the head of household as well as evidence of the current address of the family member that previously resided with them. If the family does not request a grievance hearing, or does not take either corrective action required by the notice of noncompliance within the required ten (10) business day timeframe, PHA will terminate tenancy in accordance with the Lease Termination policy found in this ACOP.
174	104	Continued Noncompliance	Not in existing policy	<ul style="list-style-type: none"> If, after the cure period, the family member is still not compliant, PHA shall terminate tenancy of the entire family, according to PHA's lease, unless the family provides documentation that the noncompliant tenant no longer resides in the unit.
175	104	PHA Implementation of Community Service	Not in existing policy	<ul style="list-style-type: none"> PHA will not substitute any community service or self-sufficiency activities performed by tenants for work

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				<p>ordinarily performed by PHA employees, or replace a job at any location where tenants perform activities to satisfy the service requirement.</p> <ul style="list-style-type: none"> If a disabled tenant certifies the inability to perform community service, PHA will ensure that requests for reasonable accommodation are handled in accordance with the Reasonable Accommodation policy found in this ACOP.
176	105	Program Design	Not in existing policy	<ul style="list-style-type: none"> PHA may administer its oversight of and tenant participation in qualifying community service or economic self-sufficiency activities directly, or may make community service activities available through a contractor, or through partnerships with qualified organizations, including tenant organizations, and community agencies or institutions.
14. Transfer Policy				
177	106	Necessary Transfers	<p>Included and revised</p> <p>Necessary Transfers identified as:</p> <ul style="list-style-type: none"> Emergency Reasonable Accommodation Structural defects (moves allow the modernization or major repair of an existing dwelling unit. Occupancy Standards Economic or Social de-concentration Split-Family Relocation from accessible units 	<ul style="list-style-type: none"> Indicates that only necessary transfers will be allowed and lists necessary transfers: <ul style="list-style-type: none"> Emergency Maintenance Emergency Public Safety Demolition Disposition, Revitalization or Rehabilitation Occupancy Standards Transfer to Make Accessible unit Available to Disabled Families Reasonable Accommodation
178	106	Mandatory Transfers	Concept included and revised	<ul style="list-style-type: none"> Mandatory transfers are defined as transfers in which PHA requires the tenant to move: <ul style="list-style-type: none"> Emergency Maintenance Demolition, Disposition, Revitalization, and Rehabilitation Occupancy Standards Transfer to Make Accessible Unit Available to Disabled Families Describes transfers that are necessary, but not mandatory based on the fact that families qualifying for these transfers are not required to move to another unit. The following are PHA transfers that are necessary, but not mandatory: <ul style="list-style-type: none"> Reasonable Accommodation Emergency Public Safety Mandatory transfers are initiated by PHA management with the issuance of a Notice of Proposed Action to the tenant. The notice explains the reason for the transfer and informs the residents of the right to a conference within five (5) days from the date of the notice, as well as the right to file a grievance. If a family requests a grievance hearing within the required timeframe, PHA may not take action on the transfer until the conclusion of the grievance process.
179	107	Emergency Maintenance	Emergency transfers are mandatory when PHA determines that conditions pose an imminent danger to family life, health or safety	<ul style="list-style-type: none"> Policy defines as a type of Emergency Transfer one that cannot be abated within 24 hours, thus requiring an immediate transfer based on the following unit conditions: <ul style="list-style-type: none"> Destruction by fire or other disaster; or The existence of a major maintenance problem that constitutes a

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				<ul style="list-style-type: none"> - serious danger to health and safety that cannot be repaired in a reasonable period of time or while the unit is occupied. • Additional language added to include that if the conditions requiring the transfer cannot be repaired, or the condition cannot be repaired in a reasonable amount of time, PHA will transfer the tenant to the first available and appropriate unit after the temporary relocation.
180	107	Emergency Public Safety	Emergency transfers are mandatory when PHA determines that conditions pose an imminent danger to family life, health or safety.	<ul style="list-style-type: none"> • Policy defines as a necessary transfer that the family can initiate. • Includes requirements for determining the validity of this type off transfer, including: <ul style="list-style-type: none"> - The condition(s) must be certified in writing by a local, State or Federal law enforcement agency. Examples of required documentation: <ul style="list-style-type: none"> - police reports, letter from law enforcement agency describing the situation and the need for a transfer, restraining order. - It must be determined that the transfer is highly likely to result in an improvement to the tenant's safety; and - Where appropriate, there must be documentation that the tenant is cooperating with law enforcement in the investigation and prosecution of the crimes that generated the need for the transfer.
181	108	Demolition, Disposition, Revitalization or Rehabilitation	Structural defects transfers permit the modernization or major repair of an existing dwelling unit.	<ul style="list-style-type: none"> • Additional language added providing detail about this type of transfer: <ul style="list-style-type: none"> - PHA will relocate a resident family with reasonable written notice when the unit or property on which the resident family lives is undergoing major rehabilitation that requires the unit to be vacant, or the unit is being disposed of or demolished. - If the PHA relocation plan calls for transferring Public Housing families to other Public Housing units, affected resident families will be given reasonable written notice and will be placed on the Transfer Waiting List. - In cases of revitalization or rehabilitation, the family may be offered a temporary relocation if applicable under the Uniform Relocation Act provisions, and may be allowed to return to their unit, depending on the established contractual and legal obligations, once revitalization or rehabilitation is complete. - Split-Family Transfers may be executed at the discretion of PHA to facilitate the relocation of families. • Demolition, Disposition, Revitalization, or Rehabilitation transfers are PHA initiated and are mandatory.
182	108	Transfers to Make an Accessible Unit Available to Disabled Families	Included	<ul style="list-style-type: none"> • The following additional language added: <ul style="list-style-type: none"> - In cases where a family requiring an accessible unit no longer requires its features (i.e. the family member dies or vacates the unit), PHA will proceed to initiate a transfer to a non-accessible unit for the remaining members (See policy on Remaining Members found in this ACOP).
183	109	Occupancy Standards	Included and revised	<ul style="list-style-type: none"> • Occupancy Standards transfers may be initiated by PHA or the resident. Occupancy Standards transfers are mandatory. • Over/under-housed status will be determined at the time of recertification/interim recertification. • Families who require transfers due to being over/under housed will be placed on the Site-based Waiting List (SBWL) for their current site. If there are not units at the current site that meet the

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184	110	Types of Tenant Requested Transfers	Allows for voluntary transfers	<p>unit size required by the family, the family must apply to be placed on the SBWL of another site that can accommodate the required unit size (for example, the family requires a six (6) bedroom unit, but there are no 6 bedroom units at the current site).</p> <ul style="list-style-type: none"> • Terminology deleted from policy and replaced with: <ul style="list-style-type: none"> - Families wishing to transfer to another unit, but do not qualify for any of PHA’s necessary transfers—See “Occupying Units at Other PHA Sites” policy • Provides that tenants may request the following transfers: <ul style="list-style-type: none"> - Emergency- Public Safety - Reasonable accommodation - Occupancy Standards—if the family is currently living in a unit that that violates PHA’s occupancy standards
185	110-111	Eligibility for Transfer	Included for Voluntary Transfers only	<ul style="list-style-type: none"> • Resident households will undergo screening to determine if the household is in “good standing”. Households must be in “good standing” in order to be placed on the transfer waiting list, unless PHA waives this requirement. PHA may waive the “good standing” requirement when it determines that the transfer is essential. Emergency transfers may be initiated prior to the completion of the good standing determination. • PHA will only consider transfer requests from tenants that meet the following requirements: <ul style="list-style-type: none"> - Have not engaged in criminal activity that threatens the health and safety of tenants and staff. This requirement applies to all members of the household who are 18 years old or older; - Have no history of disturbances that resulted in lease violations or violence toward staff or neighbors as indicated by notices of lease violation in the resident’s file. - Have been current on rent without an unpaid balance at any time in the 12 months prior to the request for transfer and at the time of transfer. - Have had no more than two repayment agreements or unpaid balances in the past two years. If back rent is owed, the family will not be transferred unless family pays the balance owed in full or PHA approves the execution of a repayment agreement. If prior payment plans have failed, the back rent must be paid in full. - Have no housekeeping lease violations or history of damaging property. A resident with housekeeping standards violations will not be transferred until the unit passes a follow-up housekeeping inspection. - Can get utilities turned on in the name of the head of household (applicable only to properties with tenant-paid utilities). • If a family agreed to be placed in a unit size smaller than designated by the occupancy guidelines, the family will not be eligible to transfer to a larger size unit for a period of two (2) years from the date of admission, unless they have a change in family size or composition, or there needed as a reasonable accommodation. • If a resident family does not meet one or more of the good standing requirements, PHA will deny the transfer, unless PHA determines to waive the requirement where PHA has determined that the transfer is essential. In the event of an Emergency Transfer, the resident family may be moved prior to the completion of the screening process. If the resident family is found to have

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				<p>failed the screening criteria after the transfer has taken place, PHA does not waive its rights to take appropriate lease enforcement action even if a new lease has been executed.</p> <ul style="list-style-type: none"> As provided for in the PHA lease, any pending legal actions or existing debts will transfer with the resident family in the event a resident family is allowed to transfer in spite of failing good standing requirements. Execution of a new lease does not waive PHA rights to collect payments due under a prior lease or waive PHA's rights to pursue termination or eviction actions under a prior lease. An exception to the good standing requirements will be made for a resident family requesting a Reasonable Accommodation transfer, except in the case of verified criminal activity or pending legal action. In addition, if there is an outstanding debt, the family must enter into a repayment agreement prior to transfer.
186	111	Security Deposit and Pet Application Fee	Not in existing policy	<ul style="list-style-type: none"> When a family transfers to a "new" unit, their security deposit will transfer to the new unit and a new deposit is not required; however, the tenant will be billed for any maintenance or other charges due for the "old" unit. In the event a family that transfers to a "new" unit has a pet registered with PHA, the pet application fee will transfer to the "new" unit and a new fee is not required; however, the tenant will be billed for any maintenance or other charges attributable to pet ownership.
187	111-112	Transfer Waiting Lists	Not in existing policy	<ul style="list-style-type: none"> Establishes policy for transfer waiting lists under PHA site-based model and in accordance with the HUD MOU re: filling accessible units/units with accessible features Centralized Transfer Waiting List <ul style="list-style-type: none"> Central Admissions Office administers a central waiting list for all transfers, EXCEPT Over/Under Housed transfers: Site-based Transfer Waiting List <ul style="list-style-type: none"> Sites administer their own transfer waiting list, EXCEPT for families requiring accessible units/units with accessible features Management of the transfer waiting list includes: Accepting transfer requests; Determining if a transfer is warranted; Placing families approved to be considered for a transfer on the site Transfer Waiting List; Screening families selected from the list; and Assigning units. When the site does not have a unit that meets the occupancy requirements of the family—i.e. family needs a 6 bdrm unit, but the site has no 6 bdrm units Centralized Tracking and Occupancy System <ul style="list-style-type: none"> The Central Admission Department maintains the Waiting List. Disabled transfer households who require accessible unit features that are not offered in their current units will have the option to select the PHA and/or AME sites for which they wish to apply. Disabled transfer households may choose to be placed on up to five (5) PHA and/or AME SBWLs for Selected Units. Alternatively, these families may elect to be placed on the 1st Available inventory-wide waiting list. Disabled transfer households will select their desired sites upon submission of an application for transfer request. All disabled households seeking a transfer to a unit that includes accessible features that are not offered in their current units must be a tenant in "good standing" in accordance with the PHA and/or AME transfer eligibility requirements. In

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				<p>addition, disabled transfer households seeking a transfer must meet all of the eligibility, suitability, or other requirements for the site they wish to transfer to, if applicable, and subject to PHA's policies on reasonable accommodation</p> <ul style="list-style-type: none"> - All transfers between PHA and AME sites, or from one AME site to another, will be processed as new applicants for the new site
188	112	Occupying Units at Other PHA Sites	Described as voluntary transfers in which families are allowed to request for "good cause". Definition for "good cause" related to the reason for transfer is not included, but the policy does state that good cause does not exist where the family's own intentional acts, negligence or reckless disregard for PHA property or the rights of others has created or contributed to the situation the family is seeking to avoid	<ul style="list-style-type: none"> • Under Site-Based Waiting Lists (SBWL) tenant families wishing to move to another PHA site will have to submit an application to be placed on the desired SBWL, instead of requesting a transfer. Tenants will be able to apply for housing on up to five (5) SBILs. Tenants will have to wait one (1) year after initial occupancy to submit an application for housing at another PHA site. Tenants will be placed on the SBWL according to date and time of transfer application. • These tenants will have to pass the eligibility and suitability screening requirements used to determine continued occupancy as stated in this ACOP. These tenants do not have to meet the admission eligibility requirements pertaining to income or preference. In addition, these families must be in compliance with the Transfer Eligibility guidelines. • The household will not be required to pay a new Security Deposit and Pet Application fee (if applicable) if housed at another PHA site.
189	112-113	Order of Processing	Necessary transfers take precedence over new admissions, while voluntary transfers are processed with new admissions at a ratio of 5:1	<ul style="list-style-type: none"> • Transfers take precedence over new admissions • On an annual basis, PHA will review its current occupancy goals and objectives and, based on that review, may revise and establish a new ratio of transfers to new admissions. Transfers are subject to the ratio of transfers to new admissions and will be made according to the transfer hierarchy. For example, in a given year if the ratio is 20:1 and there are 100 vacant units, there will be 95 transfers and 5 new admissions. • The following transfers, in the order stated below, will be processed in accordance with the transfer to new admission ratio of 20 to 1. These transfers are based on availability of the appropriate location, size and features of the available units: <ul style="list-style-type: none"> - Emergency Maintenance - Emergency Public Safety - Demolition, Disposition, Revitalization, or Rehabilitation - Transfers to make an accessible unit available to a disabled family - 504 Accommodation - Over-housed/Under-housed <ol style="list-style-type: none"> 1. Over/underhoused by more than 2 bedrooms 2. Over/underhoused by 2 or less than 2 bedrooms • Emergency transfers will not automatically go on the transfer list. Instead emergency transfers will be handled immediately, on a case-by-case basis. If the emergency will not be finally resolved by a temporary accommodation, and the tenant requires a permanent transfer, that transfer will be placed at the top of the transfer list. • When Demolition, Disposition, Revitalization, or Rehabilitation transfers are necessary, these transfer will be initiated to meet the demolition or renovation schedule. • Within each category, transfers will be processed in order of the date/time of the resident

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				<p>family's transfer request (starting with the earliest date) and required unit type.</p> <ul style="list-style-type: none"> With the approval of PHA Management, PHA may, on a case-by-case basis, transfer a resident family without regard to its placement on the transfer list in order to address the immediate need of a family in crisis. In the event this occurs, full documentation for the transfer rationale will be provided and placed in the resident's file.
190	113-114	Verification of Reason for Transfer	Not in existing policy	<ul style="list-style-type: none"> Depending on the type of transfer, lists documentation to be provided by tenants for tenant initiated transfers and documents required by PHA to include in the tenant file for PHA initiated transfers.
191	114	Transfer Offers	Not in existing policy	<ul style="list-style-type: none"> Tenants will receive one offer of a transfer, unless the family provides verifiable good cause for refusing the unit. When the transfer is required by PHA (mandatory), refusal of that offer without good cause may result in lease termination. When the transfer has been requested by the tenant, refusal of that offer without good cause will result in the removal of the household from the transfer list and the family must wait one (1) year to reapply for another transfer. The tenant must accept a unit within three (3) business days of the date the offer is communicated by PHA. Acceptance of a unit must be made in writing.
192	114-115	Good Cause for Unit Refusal	Not in this chapter of the policy—found in Waiting List and Tenant Selection chapter	<ul style="list-style-type: none"> The following acceptable reasons for good cause refusal have been removed: <ul style="list-style-type: none"> The proposed policy does not include the existence of lead-based paint in the unit as a Good Cause refusal Under Site-based Waiting Lists, the following will no longer be considered a good cause for refusing a unit: <ul style="list-style-type: none"> An elderly family may decline an offer for designated housing. Such a refusal must not adversely affect the family's position on or placement on the Public Housing waiting list.
193	115	Cost off Transfers	PHA will pay for moving costs of PHA-required transfers, with the exception of those made to correct occupancy standards.	<ul style="list-style-type: none"> Since Reasonable Accommodation transfers are not PHA initiated, the following policy language has been added: <ul style="list-style-type: none"> PHA will pay for reasonable costs related to Reasonable Accommodation transfers. Moving costs must be pre-approved by PHA. For all other transfers, all costs associated with the transfer will be the responsibility of the tenant family.
194	115	Recertification Date and Transfers	Not in existing policy	<ul style="list-style-type: none"> The recertification date will be changed to the first of the month in which the transfer took place.
15. Terminations				
195	116	Termination by Tenant	Included with additional language.	<ul style="list-style-type: none"> The additional language included: <ul style="list-style-type: none"> Notice of Intent to Vacate to be submitted 30 calendar days in advance of vacating the unit. Failure to do so will result in the continuation of rental charges. Tenants are required to return the keys to the Management Office along with the Notice of Intent to Vacate. Families that fail to return keys will be charged a fee for the cost of replacing the locks and door key. Such fees will be included in the schedule of maintenance charges. When family notice is given less than the thirty (30) days due to circumstances beyond the family's control PHA, at its discretion, may waive the thirty (30) day requirement.

No.	Page No	Sub-Heading	Existing Policy	Proposed Policy
196	116-117	Grounds for Mandatory Termination by PHA	Identifies the following as basis for mandatory termination of tenancy: <ul style="list-style-type: none"> Conviction of drug-related criminal activity for the manufacture or production of methamphetamine on the premises of federally assisted housing. 	<ul style="list-style-type: none"> Requires Notice of Intent to Vacate to be signed by the Head of Household or co-head In addition to conviction for meth production, the proposed policy includes the following as grounds for mandatory termination of lease as provided by HUD: <ul style="list-style-type: none"> Failure to provide consent Failure to document citizenship Failure to provide Social Security Number Documentation Failure to accept PHA's Offer of Lease Revision Noncompliance with Community Service Requirements
197	117-118	Other Authorized Reasons for Termination	Existing policy lists a number of reasons as grounds for lease termination under a single heading (Grounds for Termination of Lease) with additional headings that provide more detail about specific violations	<ul style="list-style-type: none"> In this section, the policy includes a violation not included in existing policy: <ul style="list-style-type: none"> Furnishing false or misleading information concerning illegal drug use or alcohol abuse
198	119	Other Serious or Repeated Violations of Material Terms of the Lease	Existing policy lists a number of reasons as grounds for lease termination under a single heading (Grounds for Termination of Lease) with additional headings that provide more detail about specific violations	<ul style="list-style-type: none"> Provides a broader listing of reasons for termination as provided for by HUD including: <ul style="list-style-type: none"> Repeated late payment of rent or other charges. Three late payments within a 12 month period shall constitute a repeated late payment.
199	119-120	Other Good Cause Reason for Termination	Existing policy lists a number of reasons as grounds for lease termination under a single heading (Grounds for Termination of Lease) with additional headings that provide more detail about specific violations	<ul style="list-style-type: none"> Provides a broader listing of reasons for termination as provided for by HUD
200	120-121	Alternatives to Termination of Tenancy	Includes as alternatives the Exclusion of culpable household members and repayment agreements for debts owed	<ul style="list-style-type: none"> Provides additional guidance on Exclusion of culpable household members as alternative to termination of tenancy: <ul style="list-style-type: none"> Head of household must certify that the culpable household member has vacated the unit and will not be permitted to visit or stay as a guest. Evidence must be presented of former culpable household member's current address upon PHA request.
201	121	Exclusion of Household Member	Not included in existing policy as an alternative to termination of tenancy.	<ul style="list-style-type: none"> PHA will consider requiring the tenant to exclude a household member in order to continue to reside in the assisted unit, where that household member has participated in or been culpable for action or failure to act that warrants termination As a condition of the family's continued occupancy, the head of household must certify that the culpable household member has vacated the unit and will not be permitted to visit or to stay as a guest in the assisted unit. The family must present evidence of the former household member's current address upon PHA request.
202	121	Repayment of Family Debts	Not included in existing policy as an alternative to termination of tenancy.	<ul style="list-style-type: none"> If the household breaches an agreement with PHA to pay amounts owed to PHA, PHA at its discretion may offer the household the opportunity to enter into a repayment agreement.
203	121-122	Factors for Considering Termination of Tenancy	Described in existing policy in multiple sections of the chapter (Standards for Violation, Required Evidence for Lease Termination, Termination: Drug-Related or Violent Criminal Activity, Termination: Alcohol Abuse by Household Members)	<ul style="list-style-type: none"> Provides more detail, including additional guidance for PHA when considering termination of tenancy: <ul style="list-style-type: none"> Use of preponderance of evidence Expanded listing of example of relevant circumstances PHA may consider

No.	Page No	Sub-Heading	Existing Policy	Proposed Policy
204	122	Terminating Tenancy of Domestic Violence Offender	Not in existing policy	<ul style="list-style-type: none"> • New policy under VAWA that gives PHA the “explicit” authority to “terminate assistance to any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others...without terminating assistance to, or otherwise penalizing the victim of such violence who is also a tenant or lawful occupant.” This authority supersedes any local, State, or other Federal law to the contrary. However, if PHA chooses to exercise this authority, PHA will follow any procedures prescribed by HUD or by applicable local, State, or Federal law regarding termination of assistance. • When the actions of a participant or other family member result in a decision to terminate the family’s assistance and another family member claims that the actions involve criminal acts of physical violence against family members or others, PHA will request that the victim submit the required certification and supporting documentation in accordance with the stated timeframe. If the certification and supporting documentation are submitted within the required timeframe, or any approved extension period, PHA will terminate the offender’s assistance. If the victim does not provide the certification and supporting documentation, as required, PHA will proceed with termination of the family’s assistance. • If PHA can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the property if the participant’s tenancy is not terminated, PHA will bypass the standard process and proceed with the immediate termination of the family’s assistance.
205	123	Lease Termination Notice	Outlines information to be included in notice and how Notices are to be delivered	<ul style="list-style-type: none"> • Provides additional information about what the Notice will include: <ul style="list-style-type: none"> - The tenant’s right to reply to the termination notice - The tenant’s right to examine PHA documents directly relevant to the termination or eviction - The tenant’s right to request a hearing in accordance with grievance policy (if applicable) - Statement of protection against termination as provided by VAWA (victims of domestic violence, dating violence, or stalking) - Statement of right of resident with a disability to meet with manager and determine whether a Reasonable Accommodation could eliminate the need for the lease termination • Describes how Notices are to be delivered—delivered directly to the tenant or an adult member of the household
206	123-124	Timing of Notice	Not in existing policy	<ul style="list-style-type: none"> • Non-payment of rent = 15th working day of the month • Other Lease terminations = 30-day written notice for serious or material lease violations • Health and safety of others is threatened; any member has engaged in any drug-related criminal activity/violent criminal activity = notice given at a minimum of 15 days, but no more than 30 days
207	124	Notice of Nonrenewal Due to Community Service Noncompliance	Not in existing policy	<ul style="list-style-type: none"> • Describes requirement for issuing notices and outcomes if the family does not respond to the initial notice of noncompliance or if the family responds, but fails to fulfill an agreement to cure: <ul style="list-style-type: none"> - If family doesn’t request a grievance hearing or doesn’t cure within the required timeframes, a termination notice will be issued - If the family doesn’t follow through with an agreed upon cure as outlined in a signed agreement with PHA a Notice of continued Noncompliance will be issued which serves as a Notice of Termination of Tenancy
208	124	Notice of Termination	Limited description of this type of notice is found in the Chapter 4:	<ul style="list-style-type: none"> • Provides detail about additional information found in these notices.

No.	Page No	Sub-Heading	Existing Policy	Proposed Policy
		Based on Citizenship Status	Eligibility and Suitability for Admission: "...families will be given notice that their assistance will be prorated and that they may request a hearing if they contest this determination."	<ul style="list-style-type: none"> In addition to the basic information required in a Lease Termination Notice, these notices also advise the family of any of the following that apply: <ul style="list-style-type: none"> Family's eligibility for proration of assistance The criteria and procedures for obtaining relief under the provisions for preservation of families Families right to request an appeal to the USCIS Families right to request and informal hearing
209	124	Notification to the Post Office	Not in existing policy	<ul style="list-style-type: none"> Indicates that PHA is responsible for notifying the local post office that the individual or family no longer resides in the unit when an individual or household is evicted
210	124-125	Record Keeping	Not in existing policy	<ul style="list-style-type: none"> Details requirements for maintaining a written record of all termination and/or evictions, including location (site where tenant resides) and what information is to be retained: <ul style="list-style-type: none"> Name of resident, number and identification of the unit occupied Date of the notice of termination of lease and any other notices required by State or local law Specific reasons for notices, including cites Date and method of notifying the resident Summary of any conferences held with the resident, including dates, participant names and conclusions
18. Homeownership—No Changes				

No.	Page No	Sub-Heading	Existing Policy	Proposed Policy
17. Program Integrity				
211	129	Analysis and Findings	<p>Under no circumstances will PHA undertake an inquiry or an audit of a participating resident arbitrarily. PHA's expectation is that residents will comply with HUD requirements, provisions of the lease, and other program rules. PHA staff will make every effort (formally and informally) to orient and educate all residents in order to avoid unintentional violations. However, PHA has a responsibility to HUD and the community to monitor residents for compliance and to investigate claims of possible abuse.</p> <ul style="list-style-type: none"> ▪ Referrals, Complaints, or Tips. PHA will follow up on referrals complaints and/or allegations of violations received from Office of the Chief of Police, Asset Managers, walk-ins, mail and by telephone. Such follow-ups will be made providing that the referral contains at least one item of information that is independently verifiable. A copy of the allegation will be retained in the resident's file. ▪ Internal File Review. A follow-up will be made if PHA staff discovers (as a function of a certification or recertification, an interim recertification, or a quality control review) information or facts that conflict with previous file data, PHA's knowledge of the resident, or statements made by the resident. ▪ Verification of Documentation. PHA will follow-up on independent verification or documentation that conflicts with representations in the resident's file (such as public record information or reports from credit bureaus or other agencies). 	<ul style="list-style-type: none"> • PHA will base its evaluation on a preponderance of the evidence collected during its investigation. • For each investigation PHA will determine: <ul style="list-style-type: none"> - Whether an error or program abuse has occurred; - Whether any amount of money is owed PHA; and - What corrective measures or penalties will be utilized.
212	129	Consideration of Remedies	Not in existing policy	<ul style="list-style-type: none"> • All errors and instances of program abuse must be corrected prospectively. Whether PHA will enforce other corrective actions and penalties depends upon the nature of the error or program abuse. • In the case of family-caused errors or program abuse, PHA will take into consideration: <ul style="list-style-type: none"> - The seriousness of the offense and the extent of participation or culpability of individual family members, - Any special circumstances surrounding the case, - Any mitigating circumstances related to the disability of a family member, and - The effects of a particular remedy on family members who were not involved in the offense.

No.	Page No	Sub-Heading	Existing Policy	Proposed Policy
213	129-130	Notice and Appeals	Not in existing policy	<ul style="list-style-type: none"> PHA will inform the relevant party in writing of its findings and remedies within ten (10) business days of the conclusion of the investigation. The notice will include: <ul style="list-style-type: none"> A description of the error or program abuse, The basis on which PHA determined the error or program abuses, The remedies to be employed, and The family's right to appeal the results through an informal hearing or grievance hearing.
214	130	Corrective Measures and Penalties	Not in existing policy	<p>Under- or Overpayment</p> <ul style="list-style-type: none"> An under- or overpayment includes an incorrect tenant rent payment by the family, or an incorrect utility reimbursement to a family. <p>Corrections</p> <ul style="list-style-type: none"> Whether the incorrect rental determination is an overpayment or underpayment, PHA must promptly correct the tenant rent and any utility reimbursement prospectively. Increases in the tenant rent will be implemented only after the family has received thirty (30) days notice. Any decreases in tenant rent will become effective the first of the month following the discovery of the error <p>Reimbursement</p> <p>Whether the family is required to reimburse PHA or PHA is required to reimburse the family depends upon which party is responsible for the incorrect payment and whether the action taken was an error or program abuse.</p>
215	130	Family-Caused Errors and Program Abuse <i>(Policy regarding reimbursement)</i>	Not in existing policy	<ul style="list-style-type: none"> An incorrect rent determination caused by a family generally would be the result of incorrect reporting of family composition, income, assets, or expenses, but also would include instances in which the family knowingly allows PHA to use incorrect information provided by a third party.
216	130	Family Reimbursement to PHA <i>(Policy regarding reimbursement)</i>	Not in existing policy	<ul style="list-style-type: none"> In the case of family-caused errors or program abuse, the family will be required to repay any amounts of rent underpaid. PHA may, but is not required to, offer the family a repayment agreement in accordance with PHA's Repayment Agreement Policy found in this ACOP. If the family fails to repay the amount owed, PHA will terminate the family's lease in accordance with the Lease Terminations Policy found in this ACOP.
217	130	PHA Reimbursement to Family <i>(Policy regarding reimbursement)</i>	Not in existing policy	<ul style="list-style-type: none"> PHA will not reimburse the family for any overpayment of rent when the family clearly causes the overpayment.
218	130-131	Prohibited Actions	Not in existing policy	<ul style="list-style-type: none"> An applicant or resident in the Public Housing program must not knowingly: <ul style="list-style-type: none"> Make a false statement to PHA; Provide incomplete or false information to PHA; and/or Commit fraud, or make false statements in connection with an application for assistance or

No.	Page No	Sub-Heading	Existing Policy	Proposed Policy
				<ul style="list-style-type: none"> with recertification of income. Any of the following will be considered evidence of family program abuse: <ul style="list-style-type: none"> - Offering bribes or illegal gratuities to PHA Board of Commissioners, employees, contractors, or other PHA representatives - Offering payments or other incentives to a third party as an inducement for the third party to make false or misleading statements to PHA on the family's behalf - Use of a false name or the use of falsified, forged, or altered documents - Intentional misreporting of family information or circumstances (e.g., misreporting of income or family composition) - Omitting facts that were obviously known by a family member (e.g., not reporting employment income) - Admission of program abuse by an adult family member - PHA may determine other actions to be program abuse based upon a preponderance of the evidence.
219	131	Penalties for Program Abuse	No reference in current policy	<ul style="list-style-type: none"> In the case of program abuse caused by a family PHA may, at its discretion, impose any of the following remedies. <ul style="list-style-type: none"> - PHA may require the family to repay any amounts owed to the program. - PHA may require, as a condition of receiving or continuing assistance, that a culpable family member not reside in the unit. - PHA may deny admission or terminate the family's lease following the Eligibility and Lease Termination policies set forth in this ACOP. - PHA may refer the family for State or Federal criminal prosecution.
220	131-132	PHA-Caused Errors or Program Abuse	<p>Included in existing policy in the Continued Occupancy Chapter:</p> <ul style="list-style-type: none"> No retroactive rent increase will be made against the family when PHA has made an error. PHA will credit the tenant's account for overpayment of rent. 	<ul style="list-style-type: none"> Additional language added to describe what constitute PHA-caused incorrect rental determinations: <ul style="list-style-type: none"> - failing to correctly apply Public Housing rules regarding family composition, income, assets, and expenses, and - errors in calculation.
221	132	Prohibited Activities	No reference in current policy	<ul style="list-style-type: none"> Any of the following will be considered evidence of program abuse by PHA staff: <ul style="list-style-type: none"> - Failing to comply with any Public Housing program requirements for personal gain - Failing to comply with any Public Housing program requirements as a result of a conflict of interest - relationship with any applicant or resident - Seeking or accepting anything of material value from applicants, residents, vendors, contractors, or other persons who provide services or materials to PHA - Disclosing confidential or proprietary information to outside parties - Gaining profit as a result of insider knowledge of PHA activities, policies, or practices - Misappropriating or misusing Public Housing funds - Destroying, concealing, removing, or inappropriately using any records related to the Public Housing program - Committing any other corrupt or criminal act in connection with any federal housing program
222	132	Criminal Prosecution	No reference in current policy	<ul style="list-style-type: none"> When PHA determines that program abuse by a family or PHA staff member has occurred and

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				<p>the amount of underpaid rent meets or exceeds the threshold for prosecution under local or State law, PHA will refer the matter to the appropriate entity for prosecution.</p> <ul style="list-style-type: none"> • When the amount of underpaid rent meets or exceeds the Federal threshold, the case will also be referred to the HUD Office of Inspector General (OIG). • Other criminal violations related to the Public Housing program will be referred to the appropriate local, State, or Federal entity.
223	132	Fraud and Program Abuse Recoveries	No reference in current policy	<ul style="list-style-type: none"> • PHAs who enter into a repayment agreement with a family to collect rent owed, initiate litigation against the family to recover rent owed, or begin eviction proceedings against a family may retain 100 percent of program funds that PHA recovers. • If PHA does none of the above, all amounts that constitute an underpayment of rent must be returned to HUD. • The family must be afforded the opportunity for a hearing through PHA's grievance process.
18. Special Programs and Allocations—New Chapter				
224		<p>No longer exists</p> <ul style="list-style-type: none"> • Local Preferences • Need Based Preferences 	<p>Selection preferences used to determine the order of applicants selected from the waiting list—Local Preferences and Need Based Preferences:</p> <p>Local Preferences</p> <ul style="list-style-type: none"> ▪ Working Families Certified by PWDC (Philadelphia Work Force Development Council) ▪ Work-Ready Families Certified by PWDC ▪ Working Families ▪ Work-Ready Families ▪ Elderly/Disabled Families Families whose head, spouse, or sole member is age sixty-two (62) or older, or is receiving Social Security disability benefits, Supplemental Security Income (SSI) disability benefits, or any other payments based on an individual's inability to work due to a disability. Section 223 of the Social Security Act defines disability as the inability to engage in any substantial gainful activity by reason of any medically determinable physical or mental impairment, which has lasted or can be expected to last for a continuous period of not less than 12 months ▪ Veteran Families Families with a Head of Household, spouse, or co-applicant who is on active or reserve duty with, or has received an honorable discharge from a branch of the United States Armed Forces within one (1) year of the date of pre-application. 	<ul style="list-style-type: none"> • Selection preferences removed, except for: <ul style="list-style-type: none"> - Under Site-based Waiting list, preference for the elderly is given by way of designated housing units/sites. • In addition, sections related to verifying preferences and changing preferences have been removed.

No.	Page No	Sub-Heading	Existing Policy	Proposed Policy
			<p>Need Based:</p> <ul style="list-style-type: none"> ▪ Involuntarily displaced; ▪ Living in substandard housing including families that are homeless or living in a shelter for the homeless and Transitionally-Housed Homeless Families ▪ Rent Burden—paying more than 50 percent of family income for rent. 	
225	133	Super Preference	<p>Applicants who can document that they have been displaced by a natural disaster declared by their governor or by the President of the United States. Applicants displaced by a declared natural disaster will take immediate priority over all other applicants and such families will move to the top of any PHA waiting list. Established by PHA.</p>	<ul style="list-style-type: none"> • Language added stating that Super Preference applicants must meet PHA income and other eligibility requirements.
226	133	Special Preference	<p>No reference in existing policy</p>	<ul style="list-style-type: none"> • PHA may provide emergency rental assistance in cases of extreme emergencies and natural disaster based on certification by the Mayor (CEO) or the Managing Director of the City of Philadelphia of families for emergency rental assistance in cases of extreme emergencies and natural disaster. • These applicants will be serviced as certified by the Mayor of the City of Philadelphia and will not exceed fifty (50) housing opportunities annually. Applicants must meet PHA program eligibility requirements as well as qualify under the specific guidelines for the program(s).
227	133	Special Admissions	<p>If HUD awards PHA program funding that is targeted for specifically named families, PHA will admit these families under a Special Admission procedure. They do not have to qualify for any preferences, nor are they required to be on the program Waiting List. In addition, PHA may develop programs that are targeted for specifically named families. These special admission families will be admitted outside of the regular Waiting List process. PHA's programs that are targeted for specific families include Super Preference and Blueprint to End Homelessness Program.</p>	<ul style="list-style-type: none"> • Renamed "Special Admissions (Special Referrals)" and stands as a catch-all for: <ul style="list-style-type: none"> - Blue-print - Nursing Home Transition Initiative (NHTI), - Liberty Resources Incorporated (LRI) Program
228	133	Good Neighbors Make Good Neighborhoods	<p>Blueprint to End Homelessness (Formerly known as) As part of the PHA Family Unification Program's Good Neighbors Make Good Neighborhoods Program, PHA will make additional housing opportunities available for families leaving Transitional Housing (Blueprint to End Homelessness).</p> <p>PHA will provide up to 400 housing opportunities to eligible families consisting of one or more of the following programs:</p> <ul style="list-style-type: none"> ▪ Public Housing 	<ul style="list-style-type: none"> • Title of program changed to Good Neighbors Make Good Neighborhoods • Additional information included: <ul style="list-style-type: none"> - Housing opportunities increased to 500 a year with 300 allocated to Public Housing. - Direct references made to MOUs signed with the city—July 2008 and April 2009.

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			<ul style="list-style-type: none"> ▪ Unit-based Voucher Program <p>A limited preference category. PHA will process eligible referral applications. Once 400 eligible applicants have been admitted to the program, PHA will suspend admissions.</p>	
229	134	<p>Nursing Home Transition Initiative (NHTI)</p> <p>Liberty Resources Incorporated (LRI) Program</p>	No reference in existing policy	<p><u>New Special Programs/Allocations</u></p> <p>Nursing Home Transition Initiative (NHTI)</p> <ul style="list-style-type: none"> • PHA will make housing opportunities available for families in the Nursing Home Transition Program. Families transitioning out of nursing homes who are able to live without skilled nursing care are referred to PHA through the Philadelphia Corporation for Aging and Jewish Education and Vocational Services. • NHTI families receive a limited local preference for hard-to-lease public housing units. <p>Liberty Resources Incorporation Program</p> <ul style="list-style-type: none"> • PHA has entered into a MOU with Liberty Resources, Inc. ("LRI"), a non-profit service-provider for persons with disabilities in Philadelphia. By the terms of this MOU, as amended, PHA will provide a limited preference for up to twenty-five (25) hard-to-lease public housing units to disabled households referred to PHA by LRI.
<p>19. Reasonable Accommodations—Chapter reflects the Board approved policy and required MTW Agreement elements (approved 2007), inclusive of the Centralized Tracking System for Accessible Units</p>				

APPENDIX E

**Comparative Summary of Changes
Existing Administrative Plan vs. Proposed Policy**

Item No	Pg. No	Sub-Heading	Existing Policy	Proposed Policy
1. Overview of the Program and Plan				
1	1	<ul style="list-style-type: none"> Moving to Work 	<ul style="list-style-type: none"> Included language based on the initial MTW Agreement 	<ul style="list-style-type: none"> Amends the policy to include the new restated MTW Agreement
2	1	<ul style="list-style-type: none"> Mission Statement 	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> Updated to include PHA promotion of ESS to help participants make the transition from subsidized to non-subsidized housing
3	1	<ul style="list-style-type: none"> Overview and Purpose of the Plan 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Includes language to address Admin Plan requirements as they relate to regulatory and MTW policies
4	2	<ul style="list-style-type: none"> Updating and Revising the Plan 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Includes policy language to reflect update and revision of policies for consistency with regulations, MTW initiatives and PHA operations
2. General Policies				
5	4	<ul style="list-style-type: none"> Upfront Income Verification Records 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Includes policies related to security and maintenance of reports generated from electronic databases such as EIV and DPW
6	4	<ul style="list-style-type: none"> Records Management 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Additional detailed language has been added to the Admin Plan on how PHA will handle matters of applicant/tenant privacy with respect to records management, records retention, individual/household information and security as it relates to: <ol style="list-style-type: none"> Records Management Privacy Act Requirements Upfront Income Verification (UIV) Records Criminal Records
7	5	<ul style="list-style-type: none"> Special Requirements for Children with Environmental Blood Lead Level 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Includes policy on PHA requirement to conduct a risk assessment when a child under 6 has an environmental intervention blood lead level Includes policy language whereby owner has to complete reduction of lead based paint hazards within 30 days after receiving the risk assessment report from PHA
3. Fair Housing & Equal Opportunity				
8	6	<ul style="list-style-type: none"> Non-Discrimination 	<ul style="list-style-type: none"> Included language requiring PHA to adhere to State, Federal and local non-discrimination laws 	<ul style="list-style-type: none"> Expands on section to include specific, applicable laws Includes language prohibiting discrimination based on marital status or sexual orientation Provides examples of prohibited, discriminatory practices
9	7	<ul style="list-style-type: none"> Providing Information to Families and Owners 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Includes policy to inform applicant families of civil rights requirements Requires HAP contract to include non-discrimination language
10	7	<ul style="list-style-type: none"> Privacy 	<ul style="list-style-type: none"> Included and revised 	<ul style="list-style-type: none"> Provides specific assurance of how sensitive information related

Item No	Pg. No	Sub-Heading	Existing Policy	Proposed Policy
				<p>to an applicant's/tenant's disability is handled by PHA (i.e. any information received related to the nature of an applicant's/tenant's disability will be destroyed or returned to the applicant/tenant.</p> <ul style="list-style-type: none"> Provides detail on how applicants/tenants can access their information related to reasonable accommodation requests
11	9	<ul style="list-style-type: none"> Reasonable Accommodation 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Defines Reasonable Accommodation as in new MTW Agreement
12	9	<ul style="list-style-type: none"> Types of Reasonable Accommodations 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Includes examples of types of Reasonable Accommodation; i.e. conducting home visits Includes accommodation related to higher utility allowances Includes additional provision that posters and housing information be in locations easily readable from a wheelchair
13	10	<ul style="list-style-type: none"> Request for an Accommodation 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Provides for policy direction on the method for requesting a Reasonable Accommodation, the family's role in making the request and PHA's decision making process.
14	10	<ul style="list-style-type: none"> Approval or Denial of a Requested Accommodation 	<ul style="list-style-type: none"> Included language stating PHA would respond in writing within 10 business days 	<ul style="list-style-type: none"> Changed language stating PHA would respond in writing in a "timely fashion"
15	11	<ul style="list-style-type: none"> Program Accessibility for Persons with Hearing or Vision Impairments 	<ul style="list-style-type: none"> Included language requiring PHA to adhere to HUD regulations under 24 CFR 8.6 	<ul style="list-style-type: none"> Includes policy that requires availability of TTD/TTY communication Includes policy stating that large-print and audio versions of key documents will be made available upon request Provides examples of alternative forms of communication
16	13	<ul style="list-style-type: none"> Oral Interpretation 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Includes additional provision that PHA will make bilingual staff available for interpretation and translation and standardize documents when feasible
17	13	<ul style="list-style-type: none"> Written Translation 	<ul style="list-style-type: none"> Included general language for determining translation of documents 	<ul style="list-style-type: none"> Includes specific thresholds for determining the translation of documents
18	14	<ul style="list-style-type: none"> Implementation Plan 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Outlines criteria for determining the necessity of a written implementation plan for serving LEP persons and the steps for its creation
19	14	<ul style="list-style-type: none"> Outreach 	<ul style="list-style-type: none"> Included and revised 	<ul style="list-style-type: none"> Includes additional language and actions related to reducing concentrations of poverty and assisted units
20	15	<ul style="list-style-type: none"> VAWA 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Updated to include all required regulations and policies related to the Violence Against Women Act of 2005 Includes definitions, confidentiality requirements, notification requirements, documentation requirements, termination and denial policies and portability HUD requires under the Violence Against Women Reauthorization Act of 2005 (VAWA) that all housing authorities establish policies that prohibit the denial of admission to an otherwise qualified applicant on the basis that the applicant is or has been a victim of domestic violence, dating violence or stalking AND that prohibit against the termination of tenancy if the

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				basis for the proposed termination is domestic violence, dating violence or stalking committed against a tenant or immediate member of the tenant's family.
4. Eligibility				
21	20	<ul style="list-style-type: none"> Definitions included under Eligibility 	<ul style="list-style-type: none"> Included and revised 	<ul style="list-style-type: none"> Updated to include definitions and of terms not previously defined in section household, dependent, full-time student, elderly, foster children and veteran
22	23	<ul style="list-style-type: none"> Live-In Aide 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Additional requirement that the family and live-in aide submit a certification stating that they meet the qualifications necessary Includes policy related to family members of live-in aides residing in the unit. Addition of family members may not result in an over housed situation according to PHA occupancy standards
23	24	<ul style="list-style-type: none"> Caretaker of a Child 	<ul style="list-style-type: none"> Not Included 	<ul style="list-style-type: none"> If neither parent nor a designated guardian remains in a household receiving assistance, policies proscribe actions to be taken by PHA, including requirement for caretaker to obtain legal custody before applying to become the head of household. Policy provisions cover treatment of income for the caretaker
24	27	<ul style="list-style-type: none"> Social Security Numbers 	<ul style="list-style-type: none"> Included and revised to reflect New Final Rule effective January 2010 and MTW policy 	<ul style="list-style-type: none"> Requirement for all HH members to provide a SS number as a condition for placement on the Waiting List. Alternate arrangements will be made for mixed families. Included time frame required for submission of SS Number for participants who have not previously provided SS Numbers. Policy includes penalties for failure to submit documentation Included SS number documentation requirement prior to approval of the addition of an adult household member. Included SS number documentation requirement for addition of a child to an existing household. Policy includes required time frame for submission of documentation.
25	29	<ul style="list-style-type: none"> Photo ID 	<ul style="list-style-type: none"> Included requirement for Photo ID for HOH 	<ul style="list-style-type: none"> Requirement for all adult HH members to provide a valid photo ID at admission and upon addition to a household Photo IDs may not be more than 8 years old
26	30	<ul style="list-style-type: none"> Determining Student Eligibility 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> States eligibility criteria for students consistent with PIH Notice 2005-16 Includes criteria for age, marital status and independence from parents
27	31	<ul style="list-style-type: none"> Criminal Record Screening 	<ul style="list-style-type: none"> Expanded policy provision 	<ul style="list-style-type: none"> When criminal investigations are pending, PHA will defer an eligibility decision until the case is determined CRC checks are valid for a period of 180 days, thereafter a new CRC must be completed if admission determination has not been made

5. Applications, Waiting List and Tenant Selection

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28	38	<ul style="list-style-type: none"> Wait List Provisions 	<ul style="list-style-type: none"> Policy included preference factors and lottery numbers in determining placement on waiting list 	<ul style="list-style-type: none"> Revised policy removes preference factors Revised policy states that placement on waiting list is determined by date and time of application
29	38	<ul style="list-style-type: none"> Placement on the Waiting List 	<ul style="list-style-type: none"> Does not provide for incomplete applications 	<ul style="list-style-type: none"> Includes policy that incomplete applications will not be added to wait list when the WL is open for a finite period of time.
30	39	<ul style="list-style-type: none"> Closing the Waiting List 	<ul style="list-style-type: none"> Waiting list will be closed when an adequate pool of applications is received to use funding 	<ul style="list-style-type: none"> Revises policy to state that waiting list will be closed when it reaches 24 months for the most current applicants.
31	40	<ul style="list-style-type: none"> Family Outreach 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Includes procedures for conducting outreach to families in compliance with fair housing requirements
32	40	<ul style="list-style-type: none"> Reporting Changes in Family Circumstances 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> If the original HOH changes while the family is on the Waiting List, the family must update the pre-application and may keep their initial date and time of application
33	40	<ul style="list-style-type: none"> Family Break-Up 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> When a family breaks up while on the waiting list, only one of the new families may retain the original date and time of application Unless there is a judicial decision or family agreement stating otherwise, the original HOH will retain the application date Policy outlines factors for other exceptions that may be made on a case-by-case basis, i.e. legal custody of minors
34	41	<ul style="list-style-type: none"> Removal from the Waiting List 	<ul style="list-style-type: none"> Families that do not respond to update process will be removed from waiting list 	<ul style="list-style-type: none"> Includes language stating that no informal hearing will be offered to a family that fails to respond to update process Families will be removed from all PH and HCV WL once housed. Families will have to sign a statement that they will not be allowed to reapply to any PHA Housing Program during their initial lease term. Exceptions may be made as a reasonable accommodation for an individual with disabilities.
35	43	<ul style="list-style-type: none"> Income Targeting MTW 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Includes language that PHA will serve substantially the same number, mix and income level of families as would have been served absent MTW status
6. Occupancy Standards				
36	45	<ul style="list-style-type: none"> Occupancy Guidelines 	<ul style="list-style-type: none"> An adult is a person who is 18 years of age or older; One bedroom will generally be assigned for each two family members. In making this determination, PHA will consider factors such as the sex, age, relationship of family members, medical reasons, the presence of a live-in aide or evidence of a disability; A husband and wife, or a couple that has an interdependent relationship will be allocated one bedroom; Children, regardless of age or sex, will be allocated one bedroom for each two children Adults of different gender will be allocated separate bedrooms; Single parents with a child that is age three or younger will be allocated one bedroom; A family that consists of a pregnant woman or an applicant who is in the process 	<ul style="list-style-type: none"> An adult is a person who is 18 years of age or older. A child is a person below 18 years of age. Two adults of the same sex who are of 2 different generations (15 year age difference) do not have to share the same bedroom. For example, a 30 year old female will not be required to share a bedroom with a 50 year old female. A husband and wife, or a couple that has an interdependent relationship will be allocated one bedroom. A single parent will be required to share a bedroom with his/her child up until the child is 3 years old. Children of the opposite sex will not be required to share a bedroom Two children of the same sex share a bedroom regardless of age.

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			<p>of obtaining legal custody of any individual who is under 18 years of age will be treated as a two person family and is eligible for either a 1 or 2 bedroom unit depending on the age of the child;</p> <ul style="list-style-type: none"> Any live-in aide for whom medical need is documented and who is approved by PHA to reside in the unit will be counted as a household member for the purpose of determining the appropriate unit size; Children who are temporarily placed in foster care with the applicant are counted as part of the family for purposes of determining appropriate bedroom size. A placement is not temporary if the goal of the foster care placement is eventual adoption by another family. If the foster care placement does not rejoin the household within the first twelve months of program participation, the PHA will notify the household that they may be over-housed. Children specified in joint custody agreements will be considered family members if the agreement specifies that they live with the parent at least 183 days a year; Space may be provided for a family member who is away at school but who lives with the family during school recesses; Unless a live-in aide resides with the family, the family unit size for any family consisting of a single person must be either a zero or one bedroom unit. A household member who is required by employment to be away from the household for long periods of time but whose income is included in the determination of income eligibility will be counted for purposes of determining the maximum FMR applicable. At the discretion of the PHA, a household member may be assigned a separate bedroom if required for documented medical reasons The bedroom size assigned should not require that more than two persons occupy the same bedroom. 	<ul style="list-style-type: none"> An unborn child will not be counted as a person in determining unit size. A single pregnant woman may be assigned to a one-bedroom unit. PHA will count a child who is temporarily away from the home because the child has been placed in foster care, kinship care, the custody of the Dept. of Human Services or is away at school so long as the family can document that the child will be living with the family. A live-in attendant may be assigned his/her own bedroom. Single elderly or disabled residents with live-in attendants will be assigned two bedroom units. PHA will allow family members of live-in aides to reside in the unit provided the addition of such family members does not cause an under-housed situation as determined by PHA occupancy standards. Children specified in joint custody agreements will be considered family members if the agreement specifies that they live with the parent for 50% or more of the time (at least 183 days a year). PHA will require verification of the custody agreement. Space may be provided for a family member who is away at school but who lives with the family during school recesses. Unless a live-in aide resides with the family, the family voucher size for any family consisting of a single person must be a one bedroom voucher. A household member who is required by employment to be away from the household for more than 183 days but whose income is included in the determination of household income will be counted for purposes of determining the unit size. At the discretion of PHA, a household member may be assigned a separate bedroom if required for documented medical reasons. PHA will follow the maximum HQS space standards in determining the maximum allowable persons in a unit.
37	46	<ul style="list-style-type: none"> Exceptions to Occupancy Guidelines 	<ul style="list-style-type: none"> Exceptions must be requested by participant and approved by Program Manager 	<ul style="list-style-type: none"> PHA may require the HOH's signature on acknowledgement and Agreement when occupancy guideline exceptions are approved
38	46	<ul style="list-style-type: none"> Processing of Exceptions 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Includes process for requesting exceptions and notification of decisions
39	47	<ul style="list-style-type: none"> Absent Family Members 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> A family member absent for 183 calendar days or less per year is considered a family member Includes exceptions for family members absent more than 183 days related to: students, foster care, adult family members and medical reasons
7. Briefing & Vouchers				
40	49	<ul style="list-style-type: none"> Notification and Attendance 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Includes process for notification of briefings and removal from

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				<ul style="list-style-type: none"> waiting list if returned by post office with no forwarding address If applicants fail to attend second scheduled briefing, they will be denied assistance, with exceptions as approved by PHA
41	49	<ul style="list-style-type: none"> Oral Briefing 	<ul style="list-style-type: none"> Includes HCV program information, where a family can lease, mobility options and MTW description 	<ul style="list-style-type: none"> Expanded to include an explanation of the advantages of moving to areas outside of high-poverty concentrations for families living in high-poverty census tracts
42	52	<ul style="list-style-type: none"> Voucher Term 	<ul style="list-style-type: none"> Initial period to locate a unit is 60 days 	<ul style="list-style-type: none"> Revises policy to 120 days for initial voucher term
43	52	<ul style="list-style-type: none"> Extension of Voucher Term 	<ul style="list-style-type: none"> Applicant can make a verbal or written request for extension 	<ul style="list-style-type: none"> Applicant must make a written request for extension
44	52	<ul style="list-style-type: none"> Suspension of Voucher Term 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> When a Request for Tenancy Approval is received, the term of the voucher will be suspended while PHA processes the request Suspension of voucher does not apply to the initial billing submission deadline for portability
8. Income & Adjusted Income				
45	53	<ul style="list-style-type: none"> Annual Income 	<ul style="list-style-type: none"> Defines Annual Income 	<ul style="list-style-type: none"> Revises and updates definition of Annual Income per Final Rule effective 1/2010
46	56	<ul style="list-style-type: none"> Seasonal Income 	<ul style="list-style-type: none"> Included and revised 	<ul style="list-style-type: none"> Policy defining seasonal income and outlining process for documentation and verification of seasonal income People in some occupations regularly work less than 12 months per year, i.e., school employees, agricultural workers and construction workers. For individuals who have seasonal income, PHA will average past actual income received or earned within the last 12 months of the determination date. PHA will request that the family provide documentation of current income. If the family can provide acceptable documentation of current income dated within the 60 day period preceding the determination date or the 60 day period following the request date, PHA may use documentation of prior year's earnings to determine annual income. Documentation may include, but is not limited to EIV, W-2 forms and tax returns
47	57	<ul style="list-style-type: none"> Anticipating Annual Income 	<ul style="list-style-type: none"> If it is not feasible to anticipate annual income for a 12 month period, a shorter period of time may be annualized, subject to re-determination at the end of shorter period 	<ul style="list-style-type: none"> When unable to determine annual income using current information, PHA will average past actual income received or earned within the last 12 months to calculate income
48	58	<ul style="list-style-type: none"> Known Changes in Income 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Includes policy for calculating annual income based on an upcoming increase or decrease in income
49	59	<ul style="list-style-type: none"> Medical Expense Deduction – Non-MTW 	<ul style="list-style-type: none"> Lists various medical expenses that can be deducted, including non-prescription medicines 	<ul style="list-style-type: none"> Includes IRS chart listing eligible medical expenses with some additions, but the exclusion of non-prescription medicines
50	61	<ul style="list-style-type: none"> Child Care Expense Deduction 	<ul style="list-style-type: none"> Deductions for child care expenses are permitted when necessary for a family member to work, seek employment, or to finish their education as long as they are not reimbursed expenses and the amount deducted does not exceed the amount of income received for employment 	<ul style="list-style-type: none"> Expands on policy to include process for determining who is enabled to pursue an eligible activity, documentation necessary for each eligible activity and limits on deductions Defines eligible child care expenses, allowable child care activities and necessary and reasonable costs

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9. Family Share & Subsidy Determination				
51	64	<ul style="list-style-type: none"> Total Tenant Payment & Rent Simplification – MTW 	<ul style="list-style-type: none"> Includes scenarios in which rent simplification does not apply Requirement of HCV participants reporting zero income to document every 90 days 	<ul style="list-style-type: none"> Adds that Rent Simplification will not apply to residents with a non-MTW voucher including those administered under portability Notes that foster children and live-in aides are not counted in household size when determining percentage of income for TTP Changes requirement to document every 120 days
52	65	<ul style="list-style-type: none"> Minimum Rent Hardship Exemption 	<ul style="list-style-type: none"> Included and revised 	<p>If a family's TTP is higher than the minimum rent, the family is not eligible for a hardship exemption.</p> <p>Proposed policy includes a list of situations that qualify for the hardship exemption:</p> <ul style="list-style-type: none"> The family has lost eligibility for or is applying for an eligibility determination for a Federal, State The family would be evicted as result of the imposition of the minimum rent requirements; The income of the family has decreased because of changed circumstances, including loss of employment; A death in the family has occurred. In order to qualify under this provision, a family must describe how the death has created a financial hardship (e.g., because of funeral-related expenses or the loss of the family member's income). <p>To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship and how the hardship has affected the family's ability to pay the minimum rent.</p>
53	66	<ul style="list-style-type: none"> Determination of Rent Hardship Exemption 	Included and revised	PHA defines temporary hardship as a hardship expected to last 90 days or less. Long term hardship is defined as a hardship expected to last more than 90 days
54	66	<ul style="list-style-type: none"> No Financial Hardship 	Included and revised	PHA will require the family to repay the suspended amount within 30 calendar days of PHA's notice that a hardship exemption has not been granted.
55	66	<ul style="list-style-type: none"> Temporary Hardship 	Included and revised	<p>Suspension period defined as 90 days</p> <p>The following statement added with respect to family resuming payment of minimum rent: "...<u>must repay PHA the amounts suspended in accordance with PHA's repayment agreement policy</u>"</p>
56	67	<ul style="list-style-type: none"> Long-Term Hardship 	<p>Minimal reference:</p> <ul style="list-style-type: none"> PHA will determine whether to reinstate the minimum rent requirement, suspend the minimum requirement for a temporary period <u>or exempt the family from the minimum rent requirement.</u> 	<p>Defines exemption from the requirement at "Long-Term Hardship" and includes the following:</p> <p>If PHA determines that the financial hardship is long-term, PHA will</p>

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				<p>exempt the family from the minimum rent requirement for so long as the hardship continues. The exemption will apply from the first of the month following the family's request until the end of the qualifying hardship. When the financial hardship has been determined to be long-term, the family is not required to repay the minimum rent. Families approved for the exemption from minimum rent are required to recertify every one hundred and twenty (120) days.</p> <p>The hardship period ends when any of the following circumstances apply:</p> <ul style="list-style-type: none"> • The family's calculated TTP is greater than the minimum rent; • For hardship conditions based on loss of income, the hardship condition will continue to be recognized until new sources of income are received to enable the family to pay at least the minimum rent. • When the minimum rent is suspended, the family share reverts to the highest of the remaining components of the calculated TTP. The example below demonstrates the effect of the minimum rent exemption. <p>Further, PHA will make a determination on the effective date of the reinstatement of the minimum rent requirement and the amount of back rent owed, if applicable.</p>
57	67	<ul style="list-style-type: none"> • Family Share 	<ul style="list-style-type: none"> • Included and revised 	<ul style="list-style-type: none"> • PHA will not approve tenancy if gross rent results in family share exceeding 40% of adjusted monthly income • PHA may approve a unit if the gross rent is above the payment standard but does results in rent that does not exceed the 40% maximum rent burden
58	68	<ul style="list-style-type: none"> • Prorated Rent For Mixed Families 	<ul style="list-style-type: none"> • Included and revised 	<ul style="list-style-type: none"> • HUD regulations prohibit assistance to ineligible family members. A mixed family is one that includes at least one U.S. citizen or eligible immigrant and any number of ineligible family members. PHA will prorate the assistance provided to a mixed family. PHA will first determine assistance as if all family members were eligible and then prorate the assistance based upon the percentage of family members that actually are eligible.
10. Verification				
59	69	<ul style="list-style-type: none"> • Consent to Release of Information and Penalties for Failing to Consent 	<ul style="list-style-type: none"> • Included and revised 	<ul style="list-style-type: none"> • Includes policy requiring applicants and residents to sign form HUD-9886 Authorization for Release of Information • If any family member refuses to sign a consent form, PHA will deny admission to applicants and terminate lease of residents
60	69	<ul style="list-style-type: none"> • Requirements for Acceptable Documentation 	<ul style="list-style-type: none"> • PHA will maintain the validity of verification for 90 days 	<ul style="list-style-type: none"> • Changes policy to 120 days

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61	71	<ul style="list-style-type: none"> Substantial Difference 	<ul style="list-style-type: none"> PHA will use baseline amount of \$50 per month 	<ul style="list-style-type: none"> Revises policy stating that PHA will request third party verification to reconcile the difference and PHA reserves the right to use any other verification method in priority order to reconcile the difference Establishes substantial difference as \$200/month
62	71	<ul style="list-style-type: none"> When a Substantial Difference Exists 	<ul style="list-style-type: none"> Included and revised 	<ul style="list-style-type: none"> If difference between verifications sources is under the threshold for substantial difference PHA will use the higher of the two, unless the family can provide verification to support the lower income. If the differences is at or exceeds the threshold, PHA will seek additional verification in order of the verification hierarchy
63	73	<ul style="list-style-type: none"> When Third-Party Verification is Not Required 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> PHA will accept certain original documents provided by the participant from a third party, i.e. pharmacy print outs, bank statements, school transcripts
64	73	<ul style="list-style-type: none"> Self-Certification 	<ul style="list-style-type: none"> Included and revised 	<ul style="list-style-type: none"> Outlines instances process for families to submit self-certifications when information cannot be verified by a third party Self-certification may not be used for social security benefits, supplemental benefits or public assistance
65	75	<ul style="list-style-type: none"> Verification of Department of Public Assistance Benefits 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> PHA will use the State's database to verify Public Assistance benefits and SS and SSI income for applicants If the database is unavailable, verification will be requested from local DPA office
66	75	<ul style="list-style-type: none"> Verification of Zero Income 	<ul style="list-style-type: none"> Applicants and participants provide verification every 90 days Requires applicants to sign a zero income certification 	<ul style="list-style-type: none"> Changes policy to require verification every 120 days Requires adult clients claiming zero income to complete a Zero Income Certification and Financial Hardship Worksheet at each recertification A new certification is required every 120 days while claiming zero income PHA will obtain necessary verification from DPA, Family Court and EIV every 120 days for zero-income adults
67	76	<ul style="list-style-type: none"> Verification of Disability 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Included policy provisions to guide verification of disability requirements. If disability is apparent, no further verification is required Third party verification must be obtained to verify that the requested accommodation is consistent with the disability and that the accommodation is in fact needed. A doctor or other medical professional, a peer support group, a non-medical service agency, or a reliable third party who is in a position to know about the individual's disability may provide verification of a disability
68	77	<ul style="list-style-type: none"> Verification of Student Status 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Student status will be verified if student is an adult, the family reports child care expenses to enable a family member to continue education or the family includes a student enrolled in

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69	77	<ul style="list-style-type: none"> Restrictions on Assistance to Students Enrolled in Institutions of Higher Education 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> higher education Outlines policy for verifying exemption to restrictions applicable only to students seeking assistance on their own, separately from their parents
11. Housing Quality Standards				
70	79	<ul style="list-style-type: none"> Types of Inspections 	<ul style="list-style-type: none"> Annual inspections – PHA will send notice 90 and 30 days prior Includes a move-out inspection 	<ul style="list-style-type: none"> PHA will send notice 60 and 30 days prior to inspection Removes move-out inspection
71	79	<ul style="list-style-type: none"> Inspection Costs 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> PHA will not charge the family or owner for inspections
72	79	<ul style="list-style-type: none"> Notice and Scheduling 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Policy outlining notification and scheduling of inspections for both family and owners
73	80	<ul style="list-style-type: none"> Owner and Family Inspection Attendance 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> An adult family member must be present at time of inspection, owner is encouraged but not required to be present At initial inspection, PHA will inspect unit with owner or representative present. Family is permitted, but not required
74	80	<ul style="list-style-type: none"> Timing of Initial HQS Inspection 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> PHA will notify owner and family of rejection if time period for correcting deficiencies has elapsed. PHA may agree to second inspections. Family can submit a new RFTA after a unit has been rejected if they have not found another unit by the time the owner completes the repairs
75	80	<ul style="list-style-type: none"> Annual HQS Inspection 	<ul style="list-style-type: none"> Included and revised 	<ul style="list-style-type: none"> If a family misses two scheduled inspections without PHA approval, PHA will consider the family to have violated its obligation to make the unit available for inspection, which may result in termination of assistance
76	80	<ul style="list-style-type: none"> Special Inspections 	<ul style="list-style-type: none"> Included and revised 	<ul style="list-style-type: none"> Updates language to state that PHA will generally only inspect those reported deficiencies, but may record additional deficiencies that are observed and require repairs. If an annual inspection has been scheduled or is due within 90 days, PHA may elect to conduct a full annual inspection
77	81	<ul style="list-style-type: none"> Emergency Conditions 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Section defines emergency conditions If owner fails to correct, housing assistance payment will be abated and the HAP contract will be terminated If family fails to correct a family caused emergency condition, PHA may terminate assistance Details policy regarding inoperable smoke detectors
78	82	<ul style="list-style-type: none"> Extensions 	<ul style="list-style-type: none"> PHA may grant an extension to 15 day requirement for non-emergency repairs 	<ul style="list-style-type: none"> Details conditions under which an extension will be approved and the duration of extension
79	83	<ul style="list-style-type: none"> HAP Contract Termination 	<ul style="list-style-type: none"> If unit continues not to meet HQS standards and abatement lasts more than two months, PHA may terminate contract with owner 	<ul style="list-style-type: none"> Maximum length of time HAP may be abated is 90 days. PHA may allow abatement past 90 days when tenant has made reasonable efforts to find a new unit and has not been successful

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				<ul style="list-style-type: none"> PHA will generally not terminate the contract until the family finds a new unit in a reasonable time PHA will provide reasonable notice of contract termination of 30 days
80	83	<ul style="list-style-type: none"> Enforcing Family Compliance 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> If an owner carries out a repair for which the family is responsible under the lease, the owner may bill the family for the cost of the repair
12. Rent and Rent Reasonableness				
81	85	<ul style="list-style-type: none"> Reasonable Rent 	<ul style="list-style-type: none"> RR determinations will be completed at initial occupancy, at recert, upon request for a rent increase 	<ul style="list-style-type: none"> PHA will conduct RR determinations when a unit is placed under HAP, when a rent increase is requested and at other times PHA deems necessary
82	88	<ul style="list-style-type: none"> Rent Changes 	<ul style="list-style-type: none"> Rent remains in effect for two years Changes are requested at anniversary of contract 	<ul style="list-style-type: none"> Rent increase requests will be accepted once per year at time of HQS annual inspection Requests must be submitted in writing within 15 days from receipt of 60 day HQS notice PHA may impose rent freezes PHA may provide for across the board rent increases
83	88	<ul style="list-style-type: none"> Property Specific Rent Policies 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> PHA may establish property-specific rent increase policies to attract and maintain owners with units that are consistently updated and have more amenities.
13. Leasing & HAP				
84	92	<ul style="list-style-type: none"> Unit Size 	<ul style="list-style-type: none"> Family may lease a unit with fewer bedrooms than stated on voucher as long as they meet HQS standards 	<ul style="list-style-type: none"> In order to be eligible, the dwelling unit must be an appropriate size for the number of persons in the household. Exceptions to this policy will be reviewed on a case by case basis by the General Manager.
85	93	<ul style="list-style-type: none"> Lease and Tenancy Addendum 	<ul style="list-style-type: none"> Lease must be in standard form in the locality by owner and may be furnished by the owner 	<ul style="list-style-type: none"> Policy requires owner to use PHA's standard lease agreement, including the HUD-required Tenancy Addendum
86	93	<ul style="list-style-type: none"> Terms of Assisted Tenancy 	<ul style="list-style-type: none"> Term of lease is two years effective April 1, 2003 Renewal will be automatic for successive definite terms or through indefinite extensions 	<ul style="list-style-type: none"> Includes two year lease term Owner may not raise rent or make any changes to the lease during initial term Any provisions for renewal will be stated in the lease.
87	94	<ul style="list-style-type: none"> Separate Non-Lease Agreement between Owner and Tenant 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Prohibits owners from demanding or accepting any rent in excess of the rent to the owner minus PHA's housing assistance payments Prohibits owner from charging the tenant extra for items usually included in the rent in the locality or provided at no additional cost to unsubsidized tenants
88	96	<ul style="list-style-type: none"> HAP Contract Execution 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Includes additional requirement that owners submit IRS form W-9 before the HAP contract is executed
89	99	<ul style="list-style-type: none"> Breach of HAP Contract 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Outlines actions that constitute a breach of contract by the owner and PHA rights and remedies against the owner

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14. Owners				
90	101	<ul style="list-style-type: none"> Owner Recruitment and Retention 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Includes policy on conducting outreach to property owners including recruiting outside areas of poverty and minority concentration Includes policy on customer service to be provided to owner participants
91	102	<ul style="list-style-type: none"> New and Existing Owner Certification 	<ul style="list-style-type: none"> Included and revised 	<ul style="list-style-type: none"> Includes requirement that owners take PHA's Institute of Real Estate Management training or equivalent Owner must provide copy of property management agreement if applicable Has a current valid rental license by producing a copy of the rental license; Is current on all State and local taxes, fines, assessments and/or payment agreements related to real estate taxes; Has completed PHA's Institute of Real Estate Management "So You Want to be a Property Manager" training or equivalent owner training; Is current on the utility payments for the property and/or payment agreements related to utilities; Verifies ownership by producing a copy of the Deed of Record or a HUD 1 Settlement Statement or verifies, via the on-line database of the BRT (Bureau of Real Estate Taxes), provided that the owner name is an exact match; Has provided a verified Employer Identification Number or verified Social Security Number; and Has provided a valid government issued photo identification Has provided a property management agreement if a property management company, agent or representative is used to oversee the property.
92	105	<ul style="list-style-type: none"> Conflict of Interest 	<ul style="list-style-type: none"> Owner cannot be an employee of the HCV program at PHA 	<ul style="list-style-type: none"> PHA will not approve tenancy to anyone that is employed or in a position that is considered a conflict of interest (detailed in policy) during tenure or for one year thereafter HUD can waive requirements for good cause
15. Payment Standards & Utility Allowances				
93	108	<ul style="list-style-type: none"> Changes in Payment Standards 	<ul style="list-style-type: none"> Included and revised 	<ul style="list-style-type: none"> PHA will apply the payment standard in effect at the time of regular recertification regardless of fluctuations in payment standard from the prior regular recertification
94	108	<ul style="list-style-type: none"> Updating Payment Standards 	<ul style="list-style-type: none"> PHA will review the appropriateness of the payment standards annually 	<ul style="list-style-type: none"> Revises policy to state that changes in payment standards will generally be effective November 1 of each year, unless new FMR are published that cause standards to be outside of 90%-110% range PHA will not make retroactive adjustments for any recertifications

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				that have been processed and will be effective on or after Nov. 1 if new payment standards go into effect on November 1
95	111	<ul style="list-style-type: none"> Utility Allowance Schedules 	<ul style="list-style-type: none"> PHA maintains Utility Allowance Schedules for the cost of tenant-supplied ranges 	<ul style="list-style-type: none"> PHA does not maintain a schedule for tenant supplied ranges since landlords are required to provide ranges as part of the Philadelphia Code
96	112	<ul style="list-style-type: none"> Planned Utility Allowance Program 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Includes policy requiring HCV participants to participate in the Philadelphia Gas Works Customer Responsibility Program The Philadelphia Housing Authority (PHA) intends to implement a change to its existing Utility Allowance policy. The revised policy will require eligible households to participate in the PGW Customer Responsibility Program (CRP). Participation in this program will place a cap on the amount of money that eligible residents will be required to pay for their gas utility payments. Payments by households under the CRP program are based on household income, not consumption. By implementing this new policy, PHA will assist HCV households to be able to afford their gas bills, without any concerns about consumption, while lowering the overall cost of the utility allowances provided by PHA.
16. Continued Occupancy				
97	114	<ul style="list-style-type: none"> Scheduling Recertifications 	<ul style="list-style-type: none"> PHA will review approximately 120 days prior to contract anniversary date 	<ul style="list-style-type: none"> PHA begins recertification process 150 days in advance of its scheduled effective date If the recertification date was within 60 days of a family request for a move, PHA will only verify information that has changed and will not run an EIV report If a family moves to a new unit, PHA will complete a full recertification
98	116	<ul style="list-style-type: none"> Determining Ongoing Eligibility of Certain Students 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Included policy to reflect Section 327 of Public Law 109-155 which established new restrictions on ongoing edibility of certain students enrolled in higher education
99	116	<ul style="list-style-type: none"> Criminal Background Checks 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Adds to policy that if the background check reveals a pending investigation, PHA will defer a termination decision until the case is decided Add policy to conduct criminal background check at each regular recertification
100	116	<ul style="list-style-type: none"> Household Member Turning 18 Between Recert Interview & Recert Effective Date 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Includes policy that PHA will include income of family members turning 18 between interview and effective date of recertification in the calculation of annual income Deductions will also be applied as if the member was an adult Release form from parent/legal guardian is required for income verification of household member that will turn 18 between recertification interview date and date of recertification Consent form from parent/legal guardian is required for criminal background check of household member that will turn 18 between

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				<ul style="list-style-type: none"> recertification interview date and date of recertification If subsequent verifications or background checks are necessary after household member turns 18, PHA will have household member sign consent form
101	118	<ul style="list-style-type: none"> Standard for Timely Reporting of Changes 	<ul style="list-style-type: none"> Household must report interim changes within 10 days of occurrence 	<ul style="list-style-type: none"> Generally, household must report interim changes within 30 days of occurrence
102	118	<ul style="list-style-type: none"> Interim Recertification - MTW 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> If someone 18 years or older is added to household between scheduled recertifications, only the new member's income will be verified as part of the interim recertification When an interim recertification is conducted, only those factors that have changed are verified and adjusted. Families must complete both the PHA and HUD authorizations for release of information
103	120	<ul style="list-style-type: none"> Interim Recertification – Temporary and Sporadic Income 	<ul style="list-style-type: none"> Households with temporary or sporadic income will be required to have their income re-examined every 90 days 	<ul style="list-style-type: none"> Temporary and sporadic income are excluded from calculations of annual income, so more frequent recertifications may be required If an adult member of the household has no other income besides temporary or sporadic, this adult will be subject to the zero income recertification and verification requirements
104	120	<ul style="list-style-type: none"> Interim Recertification – Zero Income 	<ul style="list-style-type: none"> Households with zero income must have their income re-examined at least every 90 days 	<ul style="list-style-type: none"> Households subject to the 120 day zero income verification requirement must report any changes in income and benefits between 120 day recertification periods Once a change is reported, the adult household member is no longer subject to the 120 day zero income verification requirement
105	121	<ul style="list-style-type: none"> Interim Recertification – Other 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> If a family reports a decrease in income from the loss of welfare benefits due to fraud or non-compliance with a welfare agency requirement, the family's share of the rent will not be reduced
106	121	<ul style="list-style-type: none"> Interim Recertification – Changes in Family and Household Composition 	<ul style="list-style-type: none"> A household may request one recertification every 6 months 	<ul style="list-style-type: none"> Interim recertification due to changes in family composition do not count toward the limit on interim recertifications
107	122	<ul style="list-style-type: none"> New Family and Household Members Requiring Approval 	<ul style="list-style-type: none"> Included and revised 	<ul style="list-style-type: none"> PHA will not approve the addition of a new family or household member unless the individual meets PHA's eligibility and screening criteria. PHA will not approve the addition of a foster child or foster adult if it will result in the need for a larger unit according to PHA occupancy standards. PHA will not approve the addition of other adult household members other than by reason of marriage or interdependent relationship. PHA may grant exceptions to this policy as a reasonable accommodation for a person with disabilities. If PHA determines an individual meets PHA's eligibility and

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				<p>screening criteria, PHA will provide written approval to the family.</p> <ul style="list-style-type: none"> If PHA determines that an individual does not meet the PHA's eligibility and screening criteria, PHA will notify the family in writing of its decision to deny approval of the new family or household member and the reasons for the denial.
108	123	<ul style="list-style-type: none"> Notification of New Family Share and HAP Amount 	<ul style="list-style-type: none"> 	<ul style="list-style-type: none"> PHA will notify owner and family of any changes in the amount of the HAP payment Notice will include: the amount and effective date of the new HAP payment, new family share of the rent and new tenant rent to owner
109	125	<ul style="list-style-type: none"> Guests 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Language defines guest as person temporarily staying in unit with consent of a member of the household Guests cannot remain in unit longer than 30 consecutive days or 90 cumulative days in a year Outlines exceptions and restrictions
110	126	<ul style="list-style-type: none"> Overcrowded Units Not Violating HQS Space Standards 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> PHA will provide written notice to a family when a change in family composition results in a the household's unit size being too small PHA may grant an exception if unit meets HUD's HQS space standards and the exception is justified Client is required to submit in writing their request to remain in the unit or move to a larger unit If the client wishes to search for a larger unit, PHA will issue a voucher to search for the unit
111	126	<ul style="list-style-type: none"> Units Too Large 	<ul style="list-style-type: none"> PHA will issue a new voucher The family is not required to move, but the amount of subsidy provided will be reduced to reflect the lower Payment Standard for which they now qualify 	<ul style="list-style-type: none"> PHA will notify the client in writing when a change in family composition results in a unit size being too large A briefing session will be scheduled and the family will be issued a new voucher PHA will notify client that their new payment standard and subsidy standard will become effective within 120 days from the date the voucher was issued or at the next scheduled recertification, whichever comes first Client may responsible for a greater portion of rent if they do not move to a new unit.
17. Moving With Continued Assistance				
112	127	<ul style="list-style-type: none"> Restriction on Elective Moves 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Families will not be allowed to move during the initial two year lease term Subsequent to the initial two year lease term, families will be permitted to move only at the time of biennial recertification or under extenuating circumstances as approved by PHA. Except for moves related to HQS violations, if a termination is pending, PHA will defer processing a move until the case is decided.

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				<ul style="list-style-type: none"> PHA may deny a family move if the family owes the landlord money related to tenancy.
113	128	<ul style="list-style-type: none"> Recertification of Family Income and Composition 	<ul style="list-style-type: none"> Included and revised 	<ul style="list-style-type: none"> For families approved to move to a new unit within PHA's jurisdiction, PHA will perform a new recertification and the next recertification due date will be changed to coincide with the new lease-up date For families moving out of PHA's jurisdiction under portability, PHA will follow the policies set forth under portability
114	129	<ul style="list-style-type: none"> MTW Transfers 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> PHA may authorize a limited number of split-family and voluntary transfers from public housing to the HCV and vice versa, which will be defined as MTW transfers PHA may provide up to 50 HCV and 50 PH units to be transferred back and forth between the programs, no more than 100 moves will be authorized per fiscal year Families must meet program eligibility requirements and transfers will be based on immediate need, disability needs and available of vouchers and PH units If a resident transfers from PH to the HCV program, that resident will be subject to the Seven-Year Program time limit and HCV eligibility guidelines
18. Portability				
115	131	<ul style="list-style-type: none"> Recertification of Family Income and Composition 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> No new recertification of family income and composition is required for a family who is approved to move out of its jurisdiction under portability, however PHA will generally conduct a recertification if the family's regular recertification is due within the next 120 days
116	131	<ul style="list-style-type: none"> Voucher Issuance and Term 	<ul style="list-style-type: none"> Initial term of a voucher issued under portability will be 60 days 	<ul style="list-style-type: none"> Initial term of a voucher issued under portability will be 120 days
117	134	<ul style="list-style-type: none"> Receiving HA Role 	<ul style="list-style-type: none"> Participants who port in to PHA are subject to the two year recertification 	<ul style="list-style-type: none"> Participants who port-in to PHA are NOT subject to PHA's two-year recertification requirements or rent simplification
118	135	<ul style="list-style-type: none"> Income Eligibility and Recertification 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> In conducting its own recertification of a port-in family, PHA will rely on verifications provided by initial PHA if they accurately reflect the current circumstances and were obtained within the last 120 days Any new information may be verified by documents provided by the family and adjusted, if necessary, when third party verification is received
19. Informal Reviews and Hearings				
119	143	<ul style="list-style-type: none"> Procedures for Rehearing or Further Hearing 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Hearing Officer may ask the family for additional information or adjourn the hearing in order to reconvene at a later date before reaching a decision If family misses an appointment or deadline ordered by the Hearing Officer, the action of PHA will take effect and another

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				<ul style="list-style-type: none"> hearing will not be granted A rehearing or a further hearing may be requested for the purpose of rectifying any obvious mistake of law made during the hearing or any obvious injustice not known at the time of the hearing PHA has sole discretion to grant or deny the request for further hearing or rehearing A further hearing may be limited to written submissions by the parties, in the manner specified by the Hearing Officer
120	143	<ul style="list-style-type: none"> Complaints/Investigation 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Includes specific complaints that may be investigated: For example, activities that threaten the right to peaceful enjoyment of the premises by other residents; Nuisance
121	144	<ul style="list-style-type: none"> Non-Citizen Provisions 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Expands policy to include regulations and procedures related to hearings for non-citizens outlined by HUD and USCIS
20. Termination of Assistance and Tenancy				
122	150	<ul style="list-style-type: none"> Other Authorized Reasons for Termination of Assistance 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Includes addition reasons: The family breaches the terms of the MTW Agreement or Family Economic Development Action Plan; The family reaches the end of the seven year program term limit
123	152	<ul style="list-style-type: none"> Repayment of Family Debts 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> If a family owes amounts to PHA, as a condition of continued assistance, PHA may, but is not required to offer the family a repayment agreement. See chapter on Program Integrity for policies related to repayment agreements.
124	153	<ul style="list-style-type: none"> Termination Notice 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> When termination is initiated by PHA, termination notice will be sent to the family and owner at least 30 days prior to effective date If family vacates unit without informing PHA, 30 days notice will not be given and notice will be sent at time PHA learns that family has vacated unit
21. Program Integrity				
125	160	<ul style="list-style-type: none"> Family Reimbursement to PHA 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> In the case of family-caused errors or program abuse, the family will be required to repay any excess subsidy received. PHA may, but is not required to, offer the family a repayment agreement. If the family fails to repay the amount due, PHA may terminate the family's assistance. PHA will not reimburse the family for any underpayment of assistance when the underpayment is clearly caused by the family.
126	160	<ul style="list-style-type: none"> Debt and Payment Agreements 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Participants that owe PHA money, due to underreporting, may be required to enter into a payment agreement at PHA discretion. PHA may also exercise its option to terminate assistance.
127	162	<ul style="list-style-type: none"> Owner Reimbursement to PHA 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Owner must repay PHA any excess subsidy received PHA may recover overpaid amounts by withholding housing

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				assistance payments or may allow owner to pay in installments over a period of time
128	163	<ul style="list-style-type: none"> Criminal Prosecution 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> If PHA determines program abuse by owner, family or PHA staff and the amount of overpaid subsidy meets or exceed the threshold for prosecution, PHA will refer the matter to appropriate entity for prosecution When the amount overpaid meets the Federal threshold, the case will also be referred to the OIG Other criminal violations related to HCV will be referred to appropriate entities
129	164	<ul style="list-style-type: none"> Fraud and Program Abuse Recoveries 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> PHA may retain a portion of the fraud losses recovered through litigation, court order or repayment agreement PHA must be principal party to recover amounts due as a result of fraud or abuse PHA can retain the greater of 50 percent of amount it actually collects or reasonable and necessary costs that the PHA incurs related to the collection under 24 CFR 792.202 If HUD incurs costs on behalf of PHA related to collection, these costs must be deducted from the amount retained by PHA
22. Special Programs and Allocations				
130	165	<ul style="list-style-type: none"> Super Preference 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Super Preference will be given to applicants that can document that they have been displaced by a natural disaster declared by the President of the United States Applicants with Super Preference that meet PHA income and eligibility requirements will take immediate priority over all other applicants and move to the top of the waiting list
131	166	<ul style="list-style-type: none"> Nursing Home Transition Initiative 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> PHA allocates 75 housing opportunities for families in the NHTI through the Philadelphia Corporation for Aging
132	166	<ul style="list-style-type: none"> Liberty Resources Incorporated (LRI) Program 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> PHA has allocated a life-time cap of 50 vouchers to this program that provides a limited preference for hard-to-lease units to disable households referred by LRI
133	166	<ul style="list-style-type: none"> Veteran's Affairs Supportive Housing Program (VASH) 	<ul style="list-style-type: none"> Not Included 	<ul style="list-style-type: none"> Outlines all regulations, requirements and procedures of the HUD-VASH program published under Docket No. FR-5213_N-01 PHA has been provided with 105 vouchers to the VASH program
23. Unit Based Program				
134	168	<ul style="list-style-type: none"> Selection Method 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Added a selection method for proposals to provide PHA with authority to unit based properties owned directly or indirectly by PHA, including a public housing site that has been converted to HCV assistance
135	169	<ul style="list-style-type: none"> Attaching UBV Assistance to Certain types of Properties 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Pursuant to PHA's MTW authority and as part of the implementation of its Partnership Initiative, PHA may attach or

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				<p>pay UBV assistance to certain types of properties that would otherwise be ineligible for such assistance. PHA may attach or pay UBV assistance to properties that may include but are not limited to nursing homes or facilities providing continuous psychiatric, medical, nursing services, board and care, or intermediate care (including assisted living facilities); units that are owned or controlled by an educational institution or its affiliate and are designated for occupancy by students; and transitional housing. Consistent with the foregoing, PHA may allow students to reside in units designated for occupancy by students even if such students would normally be prohibited from admission to the HCV or UBV program.</p> <ul style="list-style-type: none"> PHA will not attach or pay UBV assistance for a unit occupied by an owner and PHA may not select or enter into an agreement to enter into a HAP contract or HAP contract for a unit occupied by a family ineligible for participation in the UBV program.
136	170	<ul style="list-style-type: none"> Shallow Subsidy 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Unless part of its "shallow" subsidy UBV program, PHA will not attach or pay UBV assistance to units that are already receiving another form of subsidized housing operating assistance. With respect to a shallow subsidy UBV program, PHA will not attach or pay UBV assistance to units receiving another form of subsidized operating assistance if the UBV assistance would be duplicative or would otherwise over-subsidize the unit.
137	170	<ul style="list-style-type: none"> Subsidy Layering 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> PHA may determine the effect of subsidy on rent to owners and the duplication of subsidy or excessive subsidy, subject to the requirements regarding subsidy layering as set forth in the HUD Reform Act of 1989.
138	170	<ul style="list-style-type: none"> Percent of Dwelling Units to be Unit Based 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> To the extent approved in an MTW Plan, PHA may unit-base up to 100 percent of the dwelling units in any UBV project or building.
139	171	<ul style="list-style-type: none"> Site Selection Standards 	<ul style="list-style-type: none"> Included and revised 	<ul style="list-style-type: none"> Subject to UBV goals, civil rights requirements and HQS site standards, PHA has revised its site selection standards using MTW authority
140	173	<ul style="list-style-type: none"> Agreement to enter into a HAP Contract 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> PHA is not using an Agreement to Enter into a HAP Contract for new or substantial rehab units
141	177	<ul style="list-style-type: none"> Organization of the Waiting List 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> With PHA's prior approval, an owner may elect to receive referrals from PHA's waiting list or to use a site-based waiting list for selection of tenants for a site.
142	177	<ul style="list-style-type: none"> Selection from the Waiting List 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> For owners using a site-based waiting list, owners must refer families to PHA for the eligibility screening
143	181	<ul style="list-style-type: none"> Moves from Unit Based Assistance sites 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> The family may terminate the lease at any time after the initial term. The family must give advance written notice to the owner in accordance with the lease and provide a copy of such notice to PHA. Once a family terminates the lease, the family will no longer

Item No	Pg. No	Sub-Heading	Existing Policy	Proposed Policy
				be part of the HCV or UBV program. Pursuant to PHA's MTW authority, PHA does not provide UBV participant families who want to move with tenant-based assistance with a tenant-based HCV voucher.
144	181	<ul style="list-style-type: none"> Rent Limits 	<ul style="list-style-type: none"> Included and revised 	<p>The rent to owner will not exceed the lowest of the following amounts: (3rd bullet is new)</p> <ul style="list-style-type: none"> An amount determined by PHA, not to exceed 110 percent of the applicable fair market rent (or any PHA exception payment standard) for the unit bedroom size minus any utility allowance; The reasonable rent; The rent requested by the owner; or Such other amount determined by PHA to be appropriate for the unit based upon the nature of the unit and the RFP from which the owner was selected. For example, in certain cases, PHA believes a shallower subsidy is more appropriate.
145	182	<ul style="list-style-type: none"> Rent Increases 	<ul style="list-style-type: none"> Included and revised 	<ul style="list-style-type: none"> If an owner wishes to request an increase in the rent to owner from PHA, it must be requested at the annual anniversary of the HAP contract. There are no provisions in the UBV program for special adjustments (i.e. adjustments that reflect increases in the actual and necessary expenses of owning and maintaining the units which have resulted from substantial general increases in real property taxes, utility rates or similar costs). <p>PHA may not approve and the owner may not receive any increase of rent to owner until and unless the owner has complied with requirements of the HAP contract, including compliance with HQS. The owner may not receive any retroactive increase of rent for any period of noncompliance.</p>
24. Mod/Rehab & SRO				
146	186	<ul style="list-style-type: none"> Mod/Rehab Vacancy Claims – During Rent-Up 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> If contracted unit is not leased within 15 days of contract date, owner will be entitled to housing assistance payments of 80 percent of the contract rent for a vacancy period not exceeding 60 days
147	186	<ul style="list-style-type: none"> Mod/Rehab Vacancy Claims – After Rent-Up 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> If assisted individual moves out, the owner must be paid the housing assistance payment due under contract for so much of the month as the unit remains vacant If vacancy continues, PHA will provide owner with 80 contract rent prorated for a vacancy period not exceeding one additional month Owner is not entitled to payment for vacancies if owner evicts assisted individual, unless owner complied with all requirements of contract Owner is not entitled to any vacancy claim payment unless owner

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				has notified PHA and requested an inspection within 10 days of learning of the vacancy or prospective vacancy, has taken all feasible actions to fill vacancy and has not rejected any eligible applicant except for good cause acceptable to PHA
148	186	<ul style="list-style-type: none"> Mod/Rehab Vacancy Claims – Unpaid Rent/Damages 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> Owner may use security deposit for unpaid tenant rent or other amount which family owes under lease If the security deposit is insufficient, the owner may request reimbursement from PHA for an amount not to exceed the less of the amount owed or two months contract rent minus security deposit
25. Homeownership				
149	194	<ul style="list-style-type: none"> Refinancing 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> PHA will not allow participants to refinance except when it will result in a lower monthly payment or it will allow a participant to take out a limited amount of equity to address health and safety issues in the home Participants must request and gain approval from PHA before refinancing PHA will not approve a refinance to allow a homeowner to take cash out
26. Economic Self Sufficiency/Family Self Sufficiency				
150	201	<ul style="list-style-type: none"> Required ESS Participation – FEDAP 	<ul style="list-style-type: none"> Not included 	<ul style="list-style-type: none"> PHA has established a tiered hierarchy to identify households required to participate in the ESS program as well as households where participation is optional Policy outlines the six tiers and related requirements Referrals are made after lease-up Quarterly reports of clients by tier are reviewed to identify households where Family Economic Development Action Plans (FEDAPs) are required Where a Moving to Work Contract of Participation is required, families must enter into a FEDAP including scheduled meetings with Coordinators and establishment of ESS goals Completion of goals specified in the FEDAP is required and failure to meet the goals will result in termination from the HCV Program If a family misses two scheduled meetings, PHA will send a termination letter for program non-compliance
27. Enhanced Vouchers				
151	213	<ul style="list-style-type: none"> Over housed Families 	<ul style="list-style-type: none"> Included and revised 	<ul style="list-style-type: none"> An over-housed family must move to an appropriate size unit in the project if one is available in order to receive enhanced voucher assistance. If an over housed family refuses to move to

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				<p>the appropriate size unit, PHA will calculate the family's assistance payment for the oversized unit based on the normally applicable voucher subsidy formula using the applicable payment standard established for the tenant based voucher program.</p> <ul style="list-style-type: none">• If an appropriate size unit is not available in the project, for an over housed family, PHA will execute a HAP contact on behalf of the family for the oversized unit, provided the rent is reasonable and the unit complies with all other voucher program requirements. The enhanced voucher subsidy calculation is based on the gross rent for the oversized unit. When an appropriately sized unit becomes available in the project, the enhanced voucher family residing in the oversized unit must move to the appropriate size unit in order to continue to receive enhanced voucher assistance. The enhanced voucher subsidy calculation is based on the gross rent for the appropriate size unit.

APPENDIX F

Philadelphia Housing Authority Utility Allowance Impact Analysis

Introduction

The Philadelphia Housing Authority intends to implement a revised Utility Allowance policy that requires eligible resident households to enroll in PECO’s Customer Assistance Program (CAP) Rate program, PGW’s Customer Responsibility Program (CRP) and/or other available utility discount and energy conservation programs. Both of these programs provide discounts on utility costs to low income households. The amounts paid by PHA households under these programs will be substituted for PHA’s existing Utility Allowance amounts, except where PHA’s Utility Allowance amounts are lower. The following is an analysis of the impact of this proposed change on current households and applicants.

Total Tenant Payment (TTP) paid by PHA households is calculated based on a percentage of Total Adjusted Income. TTP is the sum of rent to owner plus tenant paid utilities (based on a Utility Allowance schedule). As shown below, under the proposed policy, TTP will remain the same for all households. While TTP will remain the same, the amounts paid by the resident household to the owner for rent and to the utility companies for utilities will change.

Eligibility

Households with gross income at or below 150% of the Federal Poverty Level (FPL) are eligible for PECO’s CAP Rate program and PGW’s Customer Responsibility Program.

PECO CAP Rate Program

The CAP Rate discount varies according to the FPL tier of the household as follows:

CAP Rate Category	Income Level	Discount Rate
A	0-25% of FPL (with extenuating circumstances)	\$12/month for any amount of usage
B	0-25% of FPL (with out extenuating circumstances)	Oct-June: 0-500 KWH: 85% discount Over 500 KWH: no discount Jul-Sept: 0-500 KWH: 85% discount 500-600 KWH: 30% discount Over 600 KWH: no discount
C	26-50% of FPL	Oct-June: 0-500 KWH: 75% discount Over 500 KWH: no discount Jul-Sept: 0-500 KWH: 75% discount 500-600 KWH: 30% discount Over 600 KWH: no discount
D	51-100% of FPL	All Months: 0-500 KWH: 50% discount Over 500 KWH: no discount
E	101-150% of FPL	All Months: 0-500 KWH: 25% discount Over 500 KWH: no discount

PGW's CRP Program

The CRP discount varies according to the FPL tier of the household as follows:

Percent of FPL	CRP Limit
0-50%	8% of income
51-100%	9% of income
101-150%	10% of income

There is a minimum monthly charge of \$25. In addition, if the customer owes PGW at the time of enrollment in CRP, there is a monthly \$5 co-pay towards the pre-program debt.

Methodology

2009 FPL values were used to determine percent of Federal Poverty Level according to family count.

2009 Federal Poverty Level by Household Size (Monthly)

1 Person	2 Persons	3 Persons	4 Persons	Each Add'l person
\$903	\$1,214	\$1,526	\$1,838	\$312

Maximum Monthly Gross Income (150% of FPL) by Household Size

1 Person	2 Persons	3 Persons	4 Persons	Each Add'l person
\$1,354	\$1,821	\$2,289	\$2,756	\$468

For Public Housing, the gas and electric portions of each household's utility allowances were determined using PHA's utility allowance table which is categorized by utility allowance Code and bedroom size.

The HCV dataset provided by PHA contained bedroom size, building description, utility use and utility types. These fields were used, along with PHA's utility allowance schedule to determine the gas & electric utility allowances for each household.

For the purpose of this analysis, the PECO CAP rate discount for October thru June was used. According to PECO, the current rate for this time period is \$.1485 per KWH.

Since electricity usage information is necessary to determine the electric cost under the PECO CAP rate program, PHA provided typical electricity usage data* (KWH) for each building type as follows:

Typical Electricity Usage* (KWH)

	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
Detached	476	547	562	716	829	938
End Row	419	553	583	652	924	1072
Inner Row	457	569	572	794	862	1143

*Excludes Air Conditioning

Since Public Housing households are not distinguished by building type, an average of the three building types was used for each bedroom size in the Scattered Site and PAPMC portion of the analysis.

The CRP cap for each household was calculated as the appropriate percentage (according to percentage of FPL) multiplied by the monthly gross income, but no less than \$25. For example, a 3 person household with monthly gross income of \$600 (39% of the FPL) would have a CRP limit of \$48 (.08 x \$600). The new Gas cost is the smaller of the PHA's current gas utility allowance or the CRP limit.

Results

- ◆ The table below shows the number of households eligible for the PECO CAP Rate or PGW CRP programs:

	Scattered Sites	PAPMC	HCV
Total Number of Households	3,838	1,642	12,072
Households with Gas or Electric Utility Allowance	3,738	1,095	12,069
Households eligible for just CAP Rate program	43	524	1,768
Households eligible for both CRP & CAP	3,205	335	9,220
Households eligible for either CRP or CAP	3,248	859	10,988
Percentage of Total Households	85%	52%	91%

- ◆ Total Tenant Payment (TTP) is a percentage of monthly household income. Because the implementation of these programs has no effect on household income, **the household TTP's will not change.**
- ◆ There will also be no impact on rent burden, which is the percentage of TTP to income, since both TTP and income remain constant.
- ◆ Not all households will have a reduction in gas cost under the CRP program. However, since all households eligible for the program will experience a reduction in electricity cost, the overall utility cost will decrease for all eligible households.
- ◆ The TTP includes both the tenant rent and the utility allowance. The tenant rent is the portion that is paid to the owner (PHA for Public Housing households or the landlord for HCV households). Because the TTP is constant, when the utility allowance decreases, the tenant rent increases. Therefore, all households experiencing a decrease in utility allowance will also experience an increase in tenant rent.
- ◆ For HCV households, an increase in tenant rent will mean a decrease in PHA's portion of the contract rent (HAP to Owner).
- ◆ Where the TTP is less than the utility allowance, PHA pays the difference to the tenant (UAP). Therefore, any reduction in utility allowance will also result in a reduction of PHA's utility allowance payment (UAP).

Examples

The table below illustrates the impact of the implementation of the CRP and CAP Rate programs on individual **Scattered Site** households:

Client (Actual Household Data Used)	1	2	3	4	5	6	7
Family Count	1	2	3	3	4	7	6
Unit Size	1	2	2	2	3	5	4
Monthly Gross Income	\$600	\$230	\$663	\$737	\$339	\$639	\$3,480
Monthly Adjusted Income	\$600	\$230	\$663	\$737	\$339	\$639	\$3,438
TTP	\$168	\$64	\$179	\$199	\$92	\$166	\$683
TTP as % of Adjusted Income	28%	28%	27%	27%	27%	26%	20%
% of FPL	67%	19%	43%	48%	18%	23%	141%
PECO category	D	B	C	C	B	B	E
CRP %	9%	8%	8%	8%	8%	8%	10%
Current System:							
TTP	\$168	\$64	\$179	\$199	\$92	\$166	\$683
Tenant Rent	\$14	\$0	\$2	\$28	\$0	\$0	\$443
Utility Allowance	\$154	\$177	\$177	\$171	\$212	\$294	\$240
UAP	\$0	\$113	\$0	\$0	\$120	\$128	\$0
Current Electric Utility Allowance	\$54	\$55	\$55	\$59	\$78	\$78	\$71
Current Gas Utility Allowance	\$100	\$122	\$122	\$112	\$134	\$216	\$169
Proposed System:							
TTP	\$168	\$64	\$179	\$199	\$92	\$166	\$683
Proposed Electric Payment	\$27	\$8	\$14	\$15	\$15	\$15	\$53
Proposed Gas Payment	\$54	\$25	\$53	\$59	\$27	\$51	\$169*
Proposed Utility Allowance	\$81	\$33	\$67	\$74	\$42	\$66	\$222
Proposed Tenant Rent	\$87	\$31	\$112	\$125	\$50	\$100	\$461
Proposed UAP	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Changes:							
Change in TTP	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Change in Electric Payment	-\$27	-\$47	-\$41	-\$44	-\$63	-\$63	-\$18
Change in Gas Payment	-\$46	-\$97	-\$69	-\$53	-\$107	-\$165	\$0
Change in Utility Allowance	-\$73	-\$144	-\$110	-\$97	-\$170	-\$228	-\$18
Change in Tenant Rent	\$73	\$31	\$110	\$97	\$50	\$100	\$18
Change in UAP	\$0	-\$113	\$0	\$0	-\$120	-\$128	\$0

*Using the CRP Calculation, this household's gas payments would be higher than the gas portion of PHA's utility allowance. This proposal assumes that this household would not be enrolled in PGW's CRP Program.

The table below illustrates the impact of the implementation of the CRP and CAP Rate programs on individual **HCV** households:

Client (Actual Household Data Used)	1	2	3	4	5	6
Family Count	8	1	2	4	6	6
Unit Size	6	1	2	3	5	4
Monthly Gross Income	\$1,383	\$594	\$316	\$453	\$580	\$2,507
Monthly Adjusted Income	\$1,383	\$594	\$316	\$453	\$538	\$2,507
TTP	\$360	\$166	\$88	\$122	\$140	\$652
TTP as % of Adjusted Income	26%	28%	28%	27%	26%	26%
% of FPL	45%	66%	26%	25%	24%	102%
PECO category	C	D	C	B	B	E
CRP %	8%	9%	8%	8%	8%	10%
Current System:						
TTP	\$360	\$166	\$88	\$122	\$140	\$652
Tenant Rent	\$47	\$45	\$0	\$0	\$0	\$345
Utility Allowance	\$313	\$121	\$174	\$184	\$259	\$307
UAP	\$0	\$0	\$86	\$62	\$119	\$0
HAP to Owner	\$1,353	\$490	\$510	\$740	\$1,000	\$420
Current Electric Utility Allowance	\$92	\$41	\$51	\$62	\$87	\$77
Current Gas Utility Allowance	\$221	\$80	\$123	\$122	\$172	\$169
Proposed System:						
TTP	\$360	\$166	\$88	\$122	\$140	\$652
Proposed Electric Payment	\$36	\$21	\$13	\$9	\$24	\$58
Proposed Gas Payment	\$111	\$53	\$25	\$36	\$46	\$169*
Proposed Utility Allowance	\$147	\$74	\$38	\$46	\$70	\$288
Proposed Tenant Rent	\$213	\$92	\$50	\$76	\$70	\$364
Proposed UAP	\$0	\$0	\$0	\$0	\$0	\$0
Proposed HAP to Owner	\$1,187	\$443	\$460	\$664	\$930	\$401
Changes:						
Change in TTP	\$0	\$0	\$0	\$0	\$0	\$1
Change in Electric Payment	-\$56	-\$21	-\$38	-\$53	-\$63	-\$19
Change in Gas payment	-\$110	-\$27	-\$98	-\$86	-\$126	\$0
Change in Utility Allowance	-\$166	-\$47	-\$136	-\$138	-\$189	-\$19
Change in Tenant Rent	\$166	\$47	\$50	\$76	\$70	\$19
Change in UAP	\$0	\$0	-\$86	-\$62	-\$119	\$0
Change in HAP to Owner	-\$166	-\$47	-\$50	-\$76	-\$70	-\$19

*Using the CRP Calculation, this household's gas payments would be higher than the gas portion of PHA's utility allowance. This proposal assumes that this household would not be enrolled in PGW's CRP Program.

Philadelphia Housing Authority

Impact of Revised Ceiling Rent Utility Allowance Policy

Introduction

PHA intends to implement a change to its Utility Allowance policy that will eliminate utility allowances for public housing residents who choose a ceiling rent. This analysis assesses the projected impact of this policy change on current households and waiting list applicants. All households will continue to have the option of choosing either a ceiling rent or an income-based rent. Currently, households on ceiling rent whose unit qualifies for a utility allowance (i.e. where tenants are required to pay for some portion of the utilities) pay a net rent that is equal to the difference between the ceiling rent and the utility allowance. If the utility allowance were no longer deducted, the new tenant rent would be equal to the ceiling rent and the total tenant payment would, in effect, be equal to the sum of the ceiling rent and the utility allowance.

In addition, the report examines how the impact will vary if eligible households were to enroll in PECO's Customer Assistance Program (CAP) Rate program and/or PGW's Customer Responsibility Program (CRP).

Methodology

- ◆ Under the current system, the TTP for ceiling rent households is equal to the ceiling rent and the Tenant Rent to PHA is equal to the difference between the ceiling rent and the utility allowance.
- ◆ Under the proposed system, the tenant no longer would receive a utility allowance and the Tenant Rent to PHA would be equal to the ceiling rent. Effectively, this results in the TTP being equal to the sum of the ceiling rent and the utility allowance.
- ◆ Methodology for the implementation of PECO's CAP Rate and PGW's CRP programs are discussed above.

Results

- ◆ The table below shows the current system for households on ceiling rent with a utility allowance:

	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR	Total
Total Number of Households on Ceiling Rent	3	37	199	69	42	11	361
Average Gross Income	\$30,864	\$34,709	\$41,267	\$47,992	\$48,559	\$50,317	\$42,942
Average Adjusted Income	\$30,312	\$34,261	\$40,755	\$47,412	\$48,002	\$49,867	\$42,419
Current System:							
Average TTP (Ceiling Rent)	\$423	\$523	\$654	\$683	\$786	\$904	\$667
Average Utility Allowance	\$141	\$175	\$206	\$241	\$278	\$310	\$220
Average Tenant Rent to PHA (Ceiling Rent - UA)	\$282	\$348	\$448	\$442	\$508	\$594	\$447
Average Rent Burden (% of TTP to Adjusted Income)	20%	20%	21%	19%	21%	22%	20%

- ♦ The table below shows the impact on TTP, tenant rent and rent burden if these ceiling rent households no longer have a utility allowance deducted, but maintain the same utility costs (contributing to the total tenant payment).

	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR	Total
Proposed System:							
Average TTP (Ceiling Rent + UA)	\$564	\$698	\$860	\$924	\$1,064	\$1,214	\$887
Average Utility Allowance	\$141	\$175	\$206	\$241	\$278	\$310	\$220
Average Tenant Rent (Ceiling Rent)	\$423	\$523	\$654	\$683	\$786	\$904	\$667
Average Rent Burden (% of TTP to Adjusted Income)	27%	27%	27%	26%	28%	30%	27%
Increase in Rent Burden	7%	7%	7%	7%	7%	8%	7%
Number of Households with Rent Burden greater than 30%*	2	13	86	24	17	6	148
Percent of Households with Rent Burden greater than 30%*	67%	35%	43%	35%	40%	55%	41%

*Households can choose an income based rent as an alternative, which would reduce their rent burden to less than 30%.

- ♦ The table below shows the impact on TTP, tenant rent and rent burden if these ceiling rent households no longer have a utility allowance deducted, but their assumed utility costs decrease do to enrollment in PECO's CAP Rate and PGW's CRP programs.

	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR	Total
Proposed System with PGW/CRP discount:							
Number of Households eligible for discount	1	4	18	18	4	1	46
Percent of Households eligible for discount	33%	11%	9%	26%	10%	9%	13%
Average TTP (Ceiling Rent + UA)	\$560	\$697	\$858	\$919	\$1,061	\$1,212	\$885
Average Utility Allowance	\$137	\$174	\$204	\$236	\$275	\$308	\$218
Change in Average Utility Allowance	(\$4)	(\$2)	(\$2)	(\$5)	(\$2)	(\$2)	(\$2)
Average Tenant Rent (Ceiling Rent)	\$423	\$523	\$654	\$683	\$786	\$904	\$667
Average Rent Burden (% of TTP to Adjusted Income)	26%	27%	27%	26%	28%	30%	27%
Increase in Rent Burden	6%	7%	6%	7%	7%	8%	7%
Number of Households with Rent Burden greater than 30%*	2	13	86	23	15	6	145
Percent of Households with Rent Burden greater than 30%*	67%	35%	43%	33%	36%	55%	40%

*Households can choose an income based rent as an alternative, which would reduce their rent burden to less than 30%.