

Providence Housing Authority
FY 2017 ANNUAL PLAN



100 Broad Street, Providence, RI 02903 www.pha-providence.com

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 02/29/2016
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Applicability. Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceeds 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceeds 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined, and is not PHAS or SEMAP troubled.

A.	PHA Information.																																
A.1	<p> PHA Name: _____ PHA Code: _____ PHA Type: <input type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): _____ PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units _____ Number of Housing Choice Vouchers (HCVs) _____ Total Combined Units/Vouchers _____ PHA Plan Submission Type: <input type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. PHAs must have the elements listed below in sections B and C readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
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Lead PHA:																																	

B.5	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p>
B.6	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) provide comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(c) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
B.7	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan. City approves the Consistency.</p>
B.8	<p>Troubled PHA.</p> <p>(a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place?</p> <p>Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
<p>C. Statement of Capital Improvements. Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).</p>	
C.1	<p>Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan (HUD-50075.2) and the date that it was approved by HUD.</p>

11.12 The PHA's Deconcentration Policy

It is PHA's policy to provide for the deconcentration of poverty and to encourage income mixing by bringing higher income families into lower income developments and lower income families into higher income developments. The PHA may skip families on the waiting list to reach other families with a lower or higher income. This will be done in a uniform and non-discriminating manner.

The PHA will affirmatively market its housing to all eligible income groups. Lower income residents will not be steered toward lower income developments and higher income people will not be steered toward higher income developments.

Prior to the beginning of each fiscal year, the PHA will analyze the income levels of families residing in each of its developments, the income levels of census tracts in which each development is located, and the income levels of the families on the waiting list. Based on this analysis, the PHA will determine the level of marketing strategies and deconcentration incentives to implement.

11.13 Deconcentration Incentives

The PHA may offer one or more incentives to encourage applicant families whose income classification would help meet the deconcentration goals of a particular development.

Various incentives may be used at different times, or under different conditions, but will always be provided in a consistent and nondiscriminatory manner.

11.14 Targeting

Per the QHWRA, in each fiscal year the PHA will reserve at least 40 percent of its new admissions for families who have incomes that do not exceed 30 percent of area median income as published by HUD.

The PHA will follow the statutory requirement that at least 40 percent of newly admitted families in any fiscal year be families whose annual income is at or below 30 percent of the area median income. To ensure that this requirement is met, the PHA will quarterly monitor the incomes of newly admitted families and the incomes of families on the waiting list. If it appears that the requirement to house extremely low-income families will not be met, the PHA will skip higher income families on the waiting list to reach extremely low-income families.

If there are not enough extremely low-income families on the waiting list, the PHA will consider outreach on a non-discriminatory basis to attract extremely low-income families to reach the statutory requirement.

Deconcentration Policy

Total Income of all Covered Developments ÷ Number of Occupied Units = Development Wide Average Income (DWAI)

Established Income Range (EIR) = 85% DWAI – 115% DWAI

PHA Covered Developments

0001

Chad Brown
Admiral Terrace

0002

Roger Williams
Coddington Court

0003

Hartford Park

0004

Manton Heights

FY 16	
Total Income	\$16,997,836
Occupied Households	1330
DWAI	\$12,780
EIR = \$10,863 - \$14,697	
All AMPS within Established Income Range	

All Elderly/Disabled Developments and Scattered Sites are excluded.

Average Income by Development

(Project Total Income *divided by* Occupied Units= Average Income per Development)

Project	Total Income	#Occupied Units	Dev. Average Income
0001 (Chad)	\$2,196,412	195	\$11,264
0001 (Ad)	\$2,090,633	148	\$14,126
0002 (Roger Williams)	\$511,695	40	\$12,792
0002 (Coddington court)	\$1,431,802	120	\$11,932
0003 (Hartford Park)*	\$6,473,617	504	\$12,845
0004 (Manton Heights)	\$4,293,677	323	\$13,293
<i>Total</i>	\$16,997,836	1330	

*All Elderly/Disabled Developments should be excluded but Hartford Park Tower is part of AMP 0004 therefore, the data is all-inclusive.

CHAPTER 3

ELIGIBILITY

INTRODUCTION

The PHA is responsible for ensuring that every individual and family admitted to the public housing program meets all program eligibility requirements. This includes any individual approved to join the family after the family has been admitted to the program. The family must provide any information needed by the PHA to confirm eligibility and determine the level of the family's assistance.

To be eligible for the public housing program:

- The applicant family must:
 - Qualify as a family as defined by HUD and the PHA.
 - Have income at or below HUD-specified income limits.
 - Qualify on the basis of citizenship or the eligible immigrant status of family members.
 - Provide social security number information for household members as required.
 - Consent to the PHA's collection and use of family information as provided for in PHA-provided consent forms.
- The PHA must determine that the current or past behavior of household members does not include activities that are prohibited by HUD or the PHA.

This chapter contains three parts:

Part I: Definitions of Family and Household Members. This part contains HUD and PHA definitions of family and household members and explains initial and ongoing eligibility issues related to these members.

Part II: Basic Eligibility Criteria. This part discusses income eligibility, and rules regarding citizenship, social security numbers, and family consent.

Part III: Denial of Admission. This part covers factors related to an applicant's past or current conduct (e.g. criminal activity) that can cause the PHA to deny admission.

PART I: DEFINITIONS OF FAMILY AND HOUSEHOLD MEMBERS

3-I.A. OVERVIEW

Some eligibility criteria and program rules vary depending upon the composition of the family requesting assistance. In addition, some requirements apply to the family as a whole and others apply to individual persons who will live in the public housing unit. This part provides information that is needed to correctly identify family and household members, and explains HUD's eligibility rules.

3-I.B. FAMILY AND HOUSEHOLD

[24 CFR 5.105(a)(2), 24CFR5.403, FR Notice 02/03/12, and Notice PIH 2014-20]

The terms *family* and *household* have different meanings in the public housing program.

FAMILY

To be eligible for admission to public housing, an applicant must qualify as a family. *Family* as defined by HUD, includes but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status: a single person, who may be an elderly person, disabled person, near-elderly person, or any other single person; or a group of persons residing together. Such group includes, but is not limited to a family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family), an elderly family, a near-elderly family, a disabled family, a displaced family, or the remaining member of a tenant family. The PHA has the discretion to determine if any other group of persons qualifies as a family.

Gender Identity means actual or perceived gender characteristics.

Sexual orientation means homosexuality, heterosexuality, or bisexuality.

PHA Policy

A family also includes two or more individuals who are not related by blood, marriage, adoption, guardianship, or other operation of law, but who either can demonstrate that they have lived together previously or certify that each individual's income and other resources will be available to meet the needs of the family and will be living in the same dwelling unit.

Each family must identify the individuals to be included in the family at the time of application, and must update this information if the family's composition changes.

HOUSEHOLD

Household is a broader term that includes additional people who, with the PHA's permission, live in a public housing unit, such as live-in aides, foster children, and foster adults.

3-I.C. FAMILY BREAKUP AND REMAINING MEMBER OF A FAMILY

FAMILY BREAKUP

Except under the following conditions, the PHA has discretion to determine which members of an assisted family continue to receive assistance if the family breaks up:

- If the family breakup results from an occurrence of domestic violence, dating violence, sexual assault, or stalking, the PHA must ensure that the victim retains assistance. (For documentation requirements and policies related to domestic violence, dating violence, sexual assault, and stalking see section 16-VII.D of this plan.)
- If a court determines the disposition of property between members of the assisted family, the PHA is bound by the court's determination of which family members continue to receive assistance.

PHA Policy

When a family on the wait list breaks up into two otherwise eligible families, only one of the new families may retain the original application date. Other former family members may submit a new application with a new application date if the wait list is open.

The individual who signs the pre-application/application form "owns" the application. If the individual who signed the application is the one that is leaving the family, s/he may designate another member of the family as the "owner" of the application so long as the newly named person was:

1. Listed as a family member on the original application;
2. Is at least 18 years old, and
3. The family has been on wait list for at least one year.

Should the owner of the application pass away, another adult member of the applicant family may assume ownership of the application by notifying the PHA of the death and providing proof of same.

If a family breaks up into two otherwise eligible families while living in public housing, only one of the new families will retain occupancy of the unit.

If a court determines the disposition of property, between members of an applicant or resident family, the PHA will abide by the court's determination.

In the absence of a judicial decision or an agreement among the original family members, the PHA will determine which family will retain their placement on the waiting list or continue in occupancy. In making its determination, the PHA will take into consideration the following factors:

1. The interest of any minor children, including custody arrangements;
2. The interest of any ill, elderly or disabled family members;
3. The interest of any family member who is or has been the victim of domestic violence, dating violence, sexual assault, or stalking, including a family member who was forced to leave a public housing unit as a result of such actual or threatened abuse, and provides documentation in accordance with Section 16-VII.D of this ACOP;
4. Any possible risks to family members as a result of criminal activity; and
5. The recommendations of social service professionals.

REMAINING MEMBER OF A TENANT FAMILY [24 CFR 5.403]

The HUD definition of family includes the remaining member of a tenant family, which is a member of a tenant family who remains in the unit when other members of the family have left the unit. [PH Occ GB, p. 26] Household members such as live-in aides, foster children and foster adults do not qualify as remaining members of a family.

If dependents are the only "remaining members of a tenant family" and there is no family member able to assume the responsibilities of the head of household, see Chapter 6, Section 6-I.B, for the policy on "Caretakers for a Child."

PHA Policy

If the remaining member is a signatory to the lease, head of household, cohead or spouse, this person may be able to continue to reside in the unit under the original lease.

If the remaining person is an adult (over18) and is named on the lease but did not sign the lease, the PHA will determine whether it would be willing to enter into a lease with this person. This determination will be made based on a suitability screening and the remaining member's ability to uphold the lease terms.

3-I.D. HEAD OF HOUSEHOLD [24 CFR 5.504(b)]

Head of household means the adult member of the family who is considered the head for purposes of determining income eligibility and rent. The head of household is responsible for ensuring that the family fulfills all of its responsibilities under the program, alone or in conjunction with a cohead or spouse.

PHA Policy

The family may designate any qualified family member as the head of household.

The head of household must have the legal capacity to enter into a lease under state and local law.

3-I.E. SPOUSE, COHEAD AND OTHER ADULT

A family may have a spouse or cohead but not both. [HUD-50058 IB, p. 13]

Spouse means the marriage partner of the head of household.

PHA Policy

A marriage partner includes the partner in a "common law" marriage as defined in state law. Although Rhode Island law has no statutory definition of "common law" marriage, case law has recognized "common law" marriages in certain instances. The term "spouse" does not apply to friends, roommates, or significant others who are not marriage partners. A minor who is emancipated under state law may be designated as a spouse.

A cohead is an individual in the household who is equally responsible with the head of household for ensuring that the family fulfills all of its responsibilities under the program, but who is not a spouse.

PHA Policy

Minors who are emancipated under state law may be designated as a cohead.

Other adult means a family member, other than the head, spouse, or cohead, who is 18 years of age or older. Foster adults and live-in aides are not considered other adults. [HUD-50058 IB, p. 14]

3-I.F. DEPENDENT [24 CFR 5.603]

A *dependent* is a family member who is under 18 years of age or a person of any age who is a person with a disability or a full-time student, except that the following persons can never be dependents: the head of household, spouse, cohead, foster children/adults and live-in aides. Identifying each dependent in the family is important because each dependent qualifies the family for a deduction from annual income as described in Chapter 6.

JOINT CUSTODY OF DEPENDENTS

PHA Policy

Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or resident family 50 percent or more of the time.

When more than one applicant or assisted family (regardless of program) are claiming the same dependents as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim the dependents. If there is a dispute about which family should claim them, the PHA will make the determination based on available documents such as court orders, an IRS income tax return showing which family has claimed the child for income tax purposes, school records, or other credible documentation.

3-I.G. FULL-TIME STUDENT [24 CFR 5.603]

A *full-time student* (FTS) is a person who is attending school or vocational training on a full-time basis. The time commitment or subject load that is needed to determine if attendance is full-time is defined by the educational institution.

Identifying each FTS is important because:

- Each family member that is an FTS, other than the head, spouse or cohead, qualifies the family for a dependent deduction, and
- The income of such an FTS is treated differently from the income of other family members.

3-I.H. ELDERLY AND NEAR-ELDERLY PERSONS, AND ELDERLY FAMILY

[24 CFR 5.100, 5.403, 945.105, and FR Notice 02/03/12]

ELDERLY PERSONS

An elderly person is a person who is at least 62 years of age.

NEAR-ELDERLY PERSONS

A near-elderly person is a person who is 50-61 years of age.

ELDERLY FAMILY

An elderly family is one in which the head, spouse, cohead, or sole member is an elderly person. Identifying elderly families is important because these families qualify for the elderly family allowance and the medical allowance as described in Chapter 6 and may qualify for a particular type of development as noted in Chapter 4.

3-I.I. PERSONS WITH DISABILITIES AND DISABLED FAMILY

[24 CFR 5.403,FR Notice 02/03/12]

PERSONS WITH DISABILITIES

Under the public housing program, special rules apply to persons with disabilities and to any family whose head, spouse, or cohead is a person with disabilities. The technical definitions of individuals with handicaps and persons with disabilities are provided in Exhibit 3-1 at the end of this chapter. These definitions are used for a number of purposes including ensuring that persons with disabilities are not discriminated against based upon disability.

As discussed in Chapter 2, the PHA must make all aspects of the public housing program accessible to persons with disabilities and consider requests for reasonable accommodations when a person's disability limits their full access to the unit, the program or the PHA's services.

DISABLED FAMILY

A disabled family is one in which the head, spouse, or cohead is a person with disabilities. Identifying disabled families is important because these families qualify for the disabled family allowance and the medical allowance as described in Chapter 6 and may qualify for a particular type of development as noted in Chapter 4.

Even though persons with drug or alcohol dependencies are considered persons with disabilities for the purpose of non-discrimination, this does not prevent the PHA from denying admission or taking action under the lease for reasons related to alcohol and drug abuse in accordance with the policies found in Part III of this chapter and in Chapter 13.

3-I.J. GUESTS [24 CFR 5.100]

A guest is defined as a person temporarily staying in the unit with the consent of a tenant or other member of the household who has express or implied authority to so consent on behalf of the tenant.

The lease must provide that the tenant has the right to exclusive use and occupancy of the leased unit by the members of the household authorized to reside in the unit in accordance with the lease, including reasonable accommodation of their guests [24 CFR 966.4(d)]. The head of household is responsible for the conduct of visitors and guests, inside the unit as well as anywhere on or near PHA premises [24 CFR 966.4(f)].

PHA Policy

A resident family must notify the PHA when overnight guests will be staying in the unit for more than 5 days.

A family may request an extension for valid reasons (e.g., care of a relative recovering from a medical procedure expected to last 20 consecutive days). An exception will not be made unless the family can identify and provide documentation of the residence to which the guest will return.

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 public housing unit more than 50 percent of the time, are not subject to the time limitations of guests as described above.

Former residents who have been evicted are not permitted as overnight guests.

Guests who represent the public housing unit address as their residence address or address of record for receipt of benefits or any other purposes will be considered unauthorized occupants. In addition, guests who remain in the unit beyond the allowable time limit will be considered to be unauthorized occupants, and their presence constitutes violation of the lease.

3-I.K. FOSTER CHILDREN AND FOSTER ADULTS

Foster adults are usually persons with disabilities, unrelated to the tenant family, who are unable to live alone [24 CFR 5.609(c)(2)].

The term *foster child* is not specifically defined by the regulations.

Foster children and foster adults that are living with an applicant or resident family are considered household members but not family members. The income of foster children/adults is not counted in family annual income and foster children/adults do not qualify for a dependent deduction. [24 CFR 5.603 and HUD-50058 IB, pp. 13-14].

PHA Policy

A *foster child* is a child that is in the legal guardianship or custody of a state, county, or private adoption or foster care agency, yet is cared for by foster parents in their own homes, under some kind of short-term or long-term foster care arrangement with the custodial agency.

Children that are temporarily absent from the home as a result of placement in foster care are discussed in Section 3-I.L.

3-I.L. ABSENT FAMILY MEMBERS

Individuals may be temporarily or permanently absent from the unit for a variety of reasons including educational activities, placement in foster care, employment, and illness.

DEFINITIONS OF TEMPORARILY AND PERMANENTLY ABSENT

PHA Policy

Generally an individual who is or is expected to be absent from the public housing unit for 120 consecutive days 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 public housing unit for more than 120 consecutive days is considered *permanently absent* and no longer a family member. In addition, Tenant(s) shall notify Management of any extended absence from the premises in excess of 7 days prior to leaving the housing development. **[PHA Lease Section L-21].**

Exceptions to this general policy are discussed below.

ABSENT STUDENTS

PHA Policy

When someone who has been considered a family member attends school away from home, the person will continue to be considered a family member unless information becomes available to the PHA indicating that the student has established a separate household or the family declares that the student has established a separate household.

ABSENCES DUE TO PLACEMENT IN FOSTER CARE [24 CFR 5.403]

Children temporarily absent from the home as a result of placement in foster care are considered members of the family.

PHA Policy

If a child has been placed in foster care, the PHA will verify with the appropriate agency whether and when the child is expected to be returned to the home. Unless the agency confirms that the child has been permanently removed from the home, or the child is anticipated to be removed from the home for more than 6-months, the child will be counted as a family member.

ABSENT HEAD, SPOUSE, OR COHEAD

PHA Policy

An employed head, spouse, or cohead absent from the unit more than 180 consecutive days due to employment will continue to be considered a family member.

ABSENCES DUE TO CONFINEMENT FOR MEDICAL REASONS

PHA Policy

A family member who becomes confined to a nursing home, hospital or other medical facility on a permanent basis will no longer be considered a family member. The tenant family may present evidence at any time that a family member is confined outside the assisted unit on a permanent basis and request that the confined person not be considered a family member.

If there is any question concerning the permanent status of a family member who is in a hospital or nursing facility, the PHA will request verification from a responsible medical professional and will use this assessment of the health professional to determine the status of the family member.

If the responsible medical professional cannot provide a determination on the length of stay, the tenant will initially be considered temporarily absent. This status will be reviewed periodically by PHA staff every 30 days. If the family member remains in the nursing home or hospital for more than 120 consecutive days, the family member will be determined to be permanently absent.

The Director, Property Management Department, may extend the time allowed for an individual confined to a medical facility by an additional 60 days so long as a responsible health professional from the facility certifies that there is a high probability that the family member will be returning to the assisted unit within this additional time.

RETURN OF PERMANENTLY ABSENT FAMILY MEMBERS

PHA Policy

The family must request PHA approval for the return of any adult family members that the PHA has determined to be permanently absent. The returning individual is subject to the eligibility and screening requirements discussed in this chapter.

Family absence from the unit is discussed in Chapter 13, Section 13-III.C Other Authorized Reasons for Termination. *[24 CFR 982.551(i)]*

3-I.M. LIVE-IN AIDE

Live-in aide means a person who resides with one or more elderly persons, or near-elderly persons, or persons with disabilities, and who: (1) is determined to be essential to the care and well-being of the person(s), (2) is not obligated for the support of the person(s), and (3) would not be living in the unit except to provide the necessary supportive services. [24 CFR 5.403]

The PHA must approve a live-in aide if needed as a reasonable accommodation for a person with disabilities in accordance with 24 CFR 8.

A live-in aide is considered a household member but not a family member. The income of the live-in aide is not counted in determining the annual income of the family [24 CFR 5.609(c)(5)]. Live-in aides are subject to the same criminal history check performed on all other adult applicants.

Relatives may be approved as live-in aides if they meet all of the criteria defining a live-in aide. However, a relative who serves as a live-in aide is not considered a family member and would not be considered a remaining member of a tenant family.

PHA Policy

A family's request for a live-in aide must be made in writing. The PHA will verify the need for a live-in aide with a reliable, knowledgeable professional as provided by the family, such as a doctor, social worker or case worker. For continued approval, the family must submit a new, written request -- subject to PHA verification -- at each annual reexamination.

In addition, the family and live-in aide will be required to submit a certification stating that the live-in aide is (1) not obligated for the support of the person(s) needing the care, and (2) would not be living in the unit except to provide the necessary supportive services.

The PHA has the discretion not to approve a particular person as a live-in aide, and may withdraw such approval, if: [24 CFR 966.4(d)(3)(i)]

- The person commits fraud, bribery or any other corrupt or criminal act in connection with any federal housing program;
- The person has a history of drug-related criminal activity or violent criminal activity; or
- The person currently owes rent or other amounts to the PHA or to another Public Housing Agency in connection with Section 8 or public housing assistance under the 1937 Act.

Within 10 business days of receiving a request for a live-in aide, including all required documentation related to the request, the PHA will notify the family of its decision in writing.

PART II: BASIC ELIGIBILITY CRITERIA

3-II.A. INCOME ELIGIBILITY AND TARGETING

INCOME LIMITS

HUD is required by law to establish income limits that determine the income eligibility of applicants for HUD's assisted housing programs, including the public housing program. The income limits are published annually and are based on HUD estimates of the median incomes for families of different sizes in a particular area or county. To be eligible for public housing, an applicant must have an annual income that is no more than the "Low-Income" limit for the jurisdiction.

TYPES OF LOW-INCOME FAMILIES [24 CFR 5.603(b)]

- **Low-income family.** A family whose annual income does not exceed 80 percent of the median income for the area, adjusted for family size.
- **Very low-income family.** A family whose annual income does not exceed 50 percent of the median income for the area, adjusted for family size.
- **Extremely low-income family.** A family whose annual income does not exceed 30 percent of the median income for the area, adjusted for family size. (Used for income targeting only, not program eligibility.)

HUD may establish income ceilings higher or lower than 30, 50 or 80 percent of the median income for an area if HUD finds that such variations are necessary because of unusually high or low family incomes.

USING INCOME LIMITS FOR ELIGIBILITY [24 CFR 960.201]

Eligibility is established by comparing a family's annual income with HUD's published income limits. To be income eligible, the annual income of an applicant must be within the low-income limit.

USING INCOME LIMITS FOR TARGETING [24 CFR 960.202(b)]

At least 40 percent of the families admitted from the PHA waiting list to the public housing program during a PHA fiscal year must be *extremely low-income* families. This is called the “basic targeting requirement.”

If admissions of extremely low-income families to the PHA’s housing choice voucher program during a PHA fiscal year exceed the 75 percent minimum targeting requirement for that program, such excess shall be credited against the PHA’s public housing basic targeting requirement for the same fiscal year.

The fiscal year credit for housing choice voucher program admissions that exceed the minimum voucher program targeting requirement must not exceed the lower of:

1. Ten percent of public housing waiting list admissions during the PHA fiscal year.
2. Ten percent of waiting list admissions to the PHA’s housing choice voucher program during the PHA fiscal year.
3. The number of qualifying low-income families who commence occupancy during the fiscal year of public housing units located in census tracts with a poverty rate of 30 percent or more. For this purpose, qualifying low-income family means a low-income family other than an extremely low-income family.

For discussion of how income targeting is used in tenant selection, see Chapter 4.

3-II.B. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS [24 CFR 5, Subpart E]

Housing assistance is available only to individuals who are U.S. citizens, U.S. nationals (herein referred to as citizens and nationals), or noncitizens that have eligible immigration status. At least one family member must be a citizen, national or noncitizen with eligible immigration status in order for the family to qualify for any level of assistance.

DECLARATION [24 CFR 5.508]

All applicant families must be notified of the requirement to submit evidence of their citizenship status when they apply. Where feasible, and in accordance with the PHA's Limited English Proficiency Plan, the notice must be in a language that is understood by the individual if the individual is not proficient in English.

HUD requires each family member to declare whether the individual is a citizen, a national, or an eligible noncitizen, except those members who elect not to contend that they have eligible immigration status. Those who elect not to contend their status are considered to be ineligible noncitizens. For citizens, nationals and eligible noncitizens the declaration must be signed personally by the head, spouse, cohead and any other family member 18 or older, and by a parent or guardian for minors. The family must identify in writing any family members who elect not to contend their immigration status (see Ineligible Noncitizens below). No declaration is required for live-in aides, foster children or foster adults.

U.S. CITIZENS AND NATIONALS

In general, citizens and nationals are required to submit only a signed declaration that claims their status. However, HUD regulations permit the PHA to request additional documentation of their status, such as a passport.

PHA Policy

Family members who declare citizenship or national status will not be required to provide additional documentation unless the PHA receives information indicating that an individual's declaration may not be accurate.

ELIGIBLE NONCITIZENS

In addition to providing a signed declaration, those declaring eligible noncitizen status must sign a verification consent form and cooperate with PHA efforts to verify their immigration status as described in Chapter 7. The documentation required for establishing eligible noncitizen status varies depending upon factors such as the date the person entered the U.S., the conditions under which eligible immigration status has been granted, the person's age, and the date on which the family began receiving HUD-funded assistance.

Lawful residents of the Marshall Islands, the Federated States of Micronesia and Palau, together known as the Freely Associated States, or FAS, are eligible for housing assistance under section 141 of the Compacts of Free Association between the U.S. Government and the Governments of the FAS [*Public Law 106-504*].

INELIGIBLE NONCITIZENS

Those noncitizens who do not wish to contend their immigration status are required to have their names listed on a noncontending family members listing, signed by the head, spouse, or cohead (regardless of citizenship status), indicating their ineligible immigration status. The PHA is not required to verify a family member's ineligible status and is not required to report an individual's unlawful presence in the U.S. to the United States Citizenship and Immigration Services (USCIS).

Providing housing assistance to noncitizen students is prohibited [*24 CFR 5.522*]. This prohibition extends to the noncitizen spouse of a noncitizen student as well as to minor children who accompany or follow to join the noncitizen student. Such prohibition does not extend to the citizen spouse of a noncitizen student or to the children of the citizen spouse and noncitizen student. Such a family is eligible for prorated assistance as a mixed family.

MIXED FAMILIES

A family is eligible for admission as long as at least one member is a citizen, national, or eligible noncitizen. Families that include eligible and ineligible individuals are considered *mixed families*. Such families will be given notice that their assistance will be prorated and that they may request a hearing if they contest this determination. See Chapter 6 for a discussion of how rents are prorated, and Chapter 14 for a discussion of informal hearing procedures.

INELIGIBLE FAMILIES *[24 CFR 5.514(d), (e), and (f)]*

The PHA may elect to provide assistance to a family before the verification of the eligibility of the individual or one family member *[24 CFR 5.512(b)]*. Otherwise, no individual or family may be assisted prior to the affirmative establishment by the PHA that the individual or at least one family member is eligible *[24 CFR 5.512(a)]*.

PHA Policy

The PHA will not provide assistance to a family before the verification of at least one family member as a citizen, national, or eligible noncitizen.

When the PHA determines that an applicant family does not include any citizens, nationals, or eligible noncitizens, following the verification process, the family will be sent a written notice within 10 business days of the determination.

The notice will explain the reasons for the denial of assistance and will advise the family of its right to request an appeal to the United States Citizenship and Immigration Services (USCIS), or to request an informal hearing with the PHA. The informal hearing with the PHA may be requested in lieu of the USCIS appeal, or at the conclusion of the USCIS appeal process. The notice must also inform the applicant family that assistance may not be delayed until the conclusion of the USCIS appeal process, but that it may be delayed pending the completion of the informal hearing process. Informal hearing procedures are contained in Chapter 14.

TIME FRAME FOR DETERMINATION OF CITIZENSHIP STATUS *[24 CFR 5.508(g)]*

For new occupants joining the resident family, the PHA must verify status at the first interim or regular reexamination following the person's occupancy, whichever comes first.

If an individual qualifies for a time extension for the submission of required documents, the PHA must grant such an extension for no more than 30 days. *[24 CFR 5.508(h)]*.

Each family member is required to submit evidence of eligible status only one time during continuous occupancy.

PHA Policy

The PHA will verify the status of applicants at the time other eligibility factors are determined.

3-II.C. SOCIAL SECURITY NUMBERS [24 CFR 5.216 and 5.218, Notice PIH 2012-10]

The applicant and all members of the applicant's household must disclose the complete and accurate social security number (SSN) assigned to each household member, and the documentation necessary to verify each SSN. If a child under age 6 has been added to an applicant family within the 6 months prior to program admission, an otherwise eligible family may be admitted to the program and must disclose and document the child's SSN within 90 days of admission. A detailed discussion of acceptable documentation is provided in Chapter 7.

Note: These requirements do not apply to noncitizens who do not contend eligible immigration status.

In addition, each participant who has not previously disclosed a SSN, has previously disclosed a SSN that HUD or the SSA determined was invalid, or has been issued a new SSN must submit their complete and accurate SSN and the documentation required to verify the SSN at the time of the next interim or annual reexamination or recertification. Participants age 62 or older as of January 31, 2010, whose determination of eligibility was begun before January 31, 2010, are exempt from this requirement, and remain exempt even if they move to a new assisted unit.

The PHA must deny assistance to an applicant family if they do not meet the SSN disclosure and documentation requirements contained in *[24 CFR 5.216]*.

3-II.D. FAMILY CONSENT TO RELEASE OF INFORMATION -[24 CFR 5.230]

HUD requires each adult family member, and the head of household, spouse, or cohead, regardless of age, to sign form HUD-9886, Authorization for the Release of Information Privacy Act Notice, and other consent forms as needed to collect information relevant to the family's eligibility and level of assistance. Chapter 7 provides detailed information concerning the consent forms and verification requirements.

The PHA must deny admission to the program if any member of the applicant family fails to sign and submit consent forms which allow the PHA to obtain information that the PHA has determined is necessary in administration of the public housing program *[24 CFR 960.259(a) and (b)]*.

PART III: DENIAL OF ADMISSION

3-III.A. OVERVIEW

A family that does not meet the eligibility criteria discussed in Parts I and II must be denied admission to public housing.

In addition, HUD requires or permits the PHA to deny admission based on certain types of current or past behaviors of family members as discussed in this part. The PHA's authority in this area is limited by the Violence against Women Act of 2013 (VAWA), which expressly prohibits the denial of admission to an otherwise qualified applicant on the basis that the applicant is or has been the victim of domestic violence, dating violence, sexual assault, or stalking [24 CFR 5.2005(b)].

Part III covers the following topics:

- Required Denial of Admission
- Other Permitted Reasons for Denial of Admission
- Screening
- Criteria for Deciding to Deny Admission
- Prohibition Against Denial of Admission to Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking
- Notice of Eligibility or Denial

3-III.B. REQUIRED DENIAL OF ADMISSION [24 CFR 960.204]

HUD requires public housing agencies to establish standards that prohibit admission of an applicant to the public housing program if they have engaged in certain criminal activity, or if the PHA has reasonable cause to believe that a household member's current use or pattern of use of illegal drugs, or current abuse or pattern of abuse of alcohol may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

Where the statute requires that the PHA prohibit admission for a prescribed period of time after some disqualifying behavior or event, the PHA may choose to continue that prohibition for a longer period of time. [24 CFR 960.203(c)(3)(ii)].

MANDATORY DENIAL - HUD requires the PHA to deny assistance in the following two cases, **without exception**:

1. Any household member that has ever been convicted of drug-related criminal activity for the production or manufacture of methamphetamine on the premises of federally assisted housing.

PHA Policy

If any household member has ever been convicted of drug-related criminal activity for the production or manufacture of methamphetamine in federally assisted housing the family will be denied admission.

2. Any household member is subject to a lifetime registration requirement under a state sex offender registration program.

PHA Policy

Any household member who is subject to a lifetime or mandatory registration requirement under a state sex offender registration program will be denied admission.

DISCRETIONARY DENIAL - HUD requires the PHA to deny assistance in the following three cases, **unless** applicant's circumstances fall within an enumerated mitigating exception:

1. Any member of the household has been evicted from federally-assisted housing in the last three (3) years for violent criminal or drug-related activity. HUD permits but does not require the PHA to admit an otherwise-eligible family if the household member has completed a PHA-approved drug rehabilitation program or the circumstances which led to eviction no longer exist (e.g. the person involved in the criminal activity no longer lives in the household).

PHA Policy

The PHA will not admit an applicant household to a PHA owned dwelling unit for three (3) years from the date of eviction for a drug related and/or a violent criminal activity of a household member.

However, the PHA may admit an otherwise eligible family who was evicted from federally-assisted housing within the past three (3) years for drug-related criminal activity so long as the person who committed the crime is no longer living in the household.

The PHA will also consider for admission an otherwise-eligible family who was evicted from federally-assisted housing within the past three (3) years for drug-related criminal activity, if the PHA is able to verify that the household member who engaged in the criminal activity has completed a supervised drug rehabilitation program approved by the PHA or has otherwise been rehabilitated successfully.

Drug-Related Criminal Activity is defined as the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug [24 CFR 5.100].

2. The PHA determines that any household member is currently engaged in the use of illegal drugs. *Drug* means a controlled substance as defined in section 102 of the Controlled Substances Act [21 U.S.C. 802]. *Currently engaged in the illegal use of a drug* means a person has engaged in the continuing illegal drug use by a household member [24 CFR 960.205(b)(1)].

PHA Policy

The PHA defines *currently engaged in* the illegal use of a drug as any use of illegal drugs during the previous six months.

If the PHA determines that the family will be denied admission based on a family member being currently engaged in the use of illegal drugs, and the family claims that the culpable family member has successfully completed a supervised drug rehabilitation program or has been rehabilitated successfully, it shall be the responsibility of the family to provide evidence that this has occurred.

Acceptable evidence is written verification of a completed substance abuse program from a recognized substance abuse treatment facility and at least six (6) months of drug sobriety.

3. The PHA has reasonable cause to believe that any household member's current use or pattern of use of illegal drugs, or current abuse or pattern of abuse of alcohol, may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

PHA Policy

In determining reasonable cause, the PHA will not consider misdemeanor arrest or conviction records. However, the PHA will consider evidence from treatment providers or community-based organizations providing services to household members.

A *pattern of illegal drug use* means more than one incident of any use of illegal drugs during the previous six months.

A pattern of abuse of alcohol means more than one incident of any such abuse of alcohol during the previous six months.

If the PHA determines that the family will be denied admission based on a family member's pattern of illegal drug use and/or pattern of abuse of alcohol, and the family claims that the culpable family member has successfully completed a supervised drug or alcohol rehabilitation program or has been rehabilitated successfully, it shall be the responsibility of the family to provide evidence that this has occurred.

Acceptable evidence is written verification of a completed substance abuse program from a recognized substance abuse treatment facility and at least six (6) months of drug and/or alcohol sobriety.

In making its decision to deny assistance, the PHA will consider the factors discussed in Sections 3-III.E & F. Upon consideration of such factors, the PHA may, on a case-by-case basis, decide not to deny assistance.

3-III.C. OTHER PERMITTED REASONS FOR DENIAL OF ADMISSION

HUD permits, but does not require the PHA to deny admission for the reasons discussed in this section.

The PHA is responsible for screening family behavior and suitability for tenancy. In doing so, the PHA may consider an applicant's history of criminal activity involving crimes of physical violence to persons or property, drug-related criminal activity and other criminal acts which might adversely affect the health, safety or welfare and right to peaceful enjoyment the premises by tenants.

VIOLENT CRIMINAL OR DRUG RELATED ACTIVITY [24 CFR 960.203(c)]

PHA Policy

If any household member has a history of criminal activity involving any of the following or similar criminal activities within the past five (5) years (*5 year look-back period*), the family may be denied admission.

- **Drug-Related Criminal Activity** such as the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug [24 CFR 5.100].
- **Violent Criminal Activity** is any criminal activity that has, as one of its elements, the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage.
- **Criminal Sexual Conduct**, including but not limited to sexual assault, incest, open, and gross lewdness, or child abuse.
- **Criminal Activity That May Threaten Others** is defined as any criminal activity that may threaten the health, safety, or welfare of other tenants, PHA personnel, contractors, subcontractors, or agents. [24 CFR 960.203(c)(3)].

Misdemeanor criminal activity is excluded from consideration in the *5 year look-back period*.

Evidence of such history of criminal activity includes, but is not limited to, an Applicant's record of convictions and record of arrests for the above-referenced criminal activities. Records of conviction may be used as both evidence and proof of engagement in criminal activity; while records of arrest may be used as evidence of engagement in criminal activity, records of arrest may not be used as proof of the same. As such, the above-referenced **5 year look-back period** will be measured from **Date of Conviction** for criminal activity.

Records of Arrest and Conviction – Fully Adjudicated

A record of conviction includes convictions resulting from trial verdicts, guilty pleas and pleas of nolo contendere. Fully adjudicated convictions are convictions which have not been appealed and/or where no appeal is pending. A fully adjudicated arrest is an arrest which led to charges and a final disposition of those charges: conviction, dismissal of case or charges dropped. The PHA places no weight on an arrest record where case was dismissed or where charges were dropped. Convictions may additionally include some form of post-conviction sentencing requirement: e.g., incarceration, suspended sentence, parole, probation.

Consistent with PHA policy of not issuing blanket denials based on records of criminal activity unless mandated to do so, PHA will not automatically deny based solely on Applicant having an adjudicated record of conviction for criminal activity, even when that record (inclusive of any post-conviction sentence) falls within the **5 year look-back period**. Rather, the PHA shall review all such Applicants on a case-by-case basis.

Records of Arrest and Conviction – Not Adjudicated

In the case of an un-adjudicated arrest, charges are pending without final disposition having entered (conviction, dismissal of case, charges dropped). Though rare, an un-adjudicated conviction may arise where an Applicant has been convicted but has appealed that conviction and the appeal is pending.

The PHA will treat Applicants with un-adjudicated records of arrest and conviction in the following manner. Both Applicant-types shall be placed in "Deferral" status under which the PHA will neither admit nor automatically deny the Applicant but shall continue with application

processing until arrest(s) and/or conviction(s) have been adjudicated. This policy shall apply to Applicants who present at time of eligibility certification with un-adjudicated records of arrest and/or conviction as well as to Applicants who develop un-adjudicated records of arrest and/or conviction at any time after eligibility certification but prior to PHA's admission decision.

PREVIOUS BEHAVIOR [960.203(c) and (d) and PH Occ GB, p. 48]

HUD authorizes the PHA to deny admission based on relevant information pertaining to the family's previous behavior and suitability for tenancy.

In the event of the receipt of unfavorable information with respect to an applicant, the PHA must consider the time, nature, and extent of the applicant's conduct (including the seriousness of the offense). As discussed in Section 3-III.F, the PHA may also need to consider whether the cause of the unfavorable information may be that the applicant is the victim of domestic violence, dating violence, sexual assault, or stalking.

PHA Policy

The PHA may deny admission to an applicant family if the PHA determines that the family:

- Has a pattern of unsuitable past performance in meeting financial obligations, including rent, within the past five (5) years.
- Has a pattern of disturbance of neighbors, destruction of property, or living or housekeeping habits at prior residences within the past five (5) years which may adversely affect the health, safety, or welfare of other tenants.
- Has a pattern of eviction from housing or termination from residential programs within the past five (5) years (considering relevant circumstances).
- Owes rent or other amounts to this or any other Public Housing Authority or any assisted housing program.
- Has misrepresented or failed to provide complete information related to eligibility, including income, criminal history, award of preferences for admission, expenses, family composition, and rental history.

In making its decision to deny admission, the PHA will consider the factors discussed in Sections 3-III.E and 3-III.F. Upon consideration of such factors, the PHA may, on a case-by-case basis, decide not to deny admission.

The PHA will consider the existence of mitigating factors, such as loss of employment or other financial difficulties, before denying admission to an applicant based on the failure to meet prior financial obligations.

3-III.D. SCREENING

SCREENING FOR ELIGIBILITY

Public Housing Agencies are authorized to obtain criminal conviction records and arrests records from law enforcement agencies to screen applicants for admission to the public housing program. This authority assists the PHA in complying with HUD requirements and PHA policies to deny assistance to applicants who are engaging in or have engaged in certain criminal activities. In order to obtain access to the records the PHA must require every applicant family to submit a consent form signed by each adult household member *[24 CFR 5.903] [PIH Notice 2015-19]*.

Additionally, the PHAs must ask whether the applicant, or any member of the applicant's household, is subject to a lifetime or mandatory registered sex offender registration requirement in any state *[Notice PIH 2012-28]*.

The PHA is also required to perform criminal background checks necessary to determine whether any household member is subject to a lifetime or mandatory registration requirement under a state sex offender program in the state where the housing is located, as well as in any other state where a household member is known to have resided *[24 CFR 960.204(a)(4)]*.

The PHA may not pass along to the applicant the costs of a criminal records check *[24 CFR 960.204(d)]*.

PHA Policy

The PHA will perform criminal background checks through local law enforcement for all adult household members.

If the results of the criminal background check indicate there may have been past criminal activity, but the results are inconclusive, the PHA will request a fingerprint card and will request information from the National Crime Information Center (NCIC).

If the PHA proposes to deny admission based on a criminal record or on lifetime or mandatory sex offender registration information, the PHA must notify the household of the proposed action and must provide the subject of the record and the applicant a copy of the record and an opportunity to dispute the accuracy and relevance of the information prior to a denial of admission *[24 CFR 5.903(f) and 5.905(d)]*.

OBTAINING INFORMATION FROM DRUG TREATMENT FACILITIES [24 CFR 960.205]

PHA Policy

The PHA will not directly obtain information from drug abuse treatment facilities to determine whether any applicant family's household members are currently engaging in illegal drug activity.

SCREENING FOR SUITABILITY AS A TENANT [24 CFR 960.203(c)]

The PHA is responsible for the screening and selection of families to occupy public housing units. The PHA may consider all relevant information. Screening is important to public housing communities and program integrity, and to ensure that assisted housing is provided to those families that will adhere to lease obligations.

PHA Policy

The PHA will consider the family's history with respect to the following factors:

- Payment of rent and utilities.
- Caring for a unit and premises.
- Respecting the rights of other residents to the peaceful enjoyment of their housing.
- Criminal activity that is a threat to the health, safety or property of others.
- Behavior of all household members as related to the grounds for denial as detailed in Sections 3-III. B and C.
- Compliance with any other essential conditions of tenancy.

RESOURCES USED TO CHECK APPLICANT SUITABILITY [PH Occ GB, pp. 47-56]

Public Housing Agencies have a variety of resources available to them for determination of the suitability of applicants. Generally, Public Housing Agencies should reject applicants who have recent behavior that would warrant lease termination for a public housing resident.

PHA Policy

In order to determine the suitability of applicants the PHA will examine applicant history for the past five years.

1. Past Performance in Meeting Financial Obligations

Such financial background checks may include but not be limited to:

- Public/private landlord references for the past five years;
- Information about past performance meeting rental obligations such as rent payment record, late payment record;
- Information on whether the public/private landlord ever began or completed lease termination for non-payment;
- Information on whether utilities were ever disconnected in the unit;
- Ask public/private landlords if they would rent to the applicant family again;
- Information from utility companies covering the monthly amount of utilities, late payment, disconnection, return of a utility deposit and whether the applicant can get utilities turned on in his/her name. (Use of this inquiry will be reserved for applicants applying for units where there are tenant-paid utilities.);
- If an applicant has no rental payment history the PHA may check court records of eviction actions and other financial judgments, and credit reports;
- An applicant with no rental payment history may be asked to provide the PHA with character references.
- If previous landlords or the utility company do not respond to requests from the PHA, the applicant may provide other documentation that demonstrates their ability to meet financial obligations (e.g. rent receipts, cancelled checks, etc.)

2. Disturbances of Neighbors, Destruction of Property or Living or Housekeeping Habits at Prior Residences that May Adversely Affect Health, Safety, or Welfare of Other Tenants, or Cause Damage to the Unit or the Development

Such housekeeping and behavior background checks may include but not be limited to:

- Public/private landlord references for the past five years,
- Information on whether the applicant kept a unit clean, safe and sanitary;
- Information on whether the applicant violated health or safety codes;
- Information on whether any damage was done by the applicant to a current or previous unit or the development, and, if so, how much the repair of the damage cost;
- Information on whether the applicant's housekeeping caused insect or rodent infestation; and whether the neighbors complained about the applicant or whether the police were ever called because of disturbances.
- Obtain police and court records within the past five years to determine if there is any evidence of disturbance of neighbors or destruction of property that might have resulted in a conviction. A record of arrest(s) will not be used as the basis for the denial or proof that the applicant engaged in disqualifying activity.
- Home visits will be used for all applicants for General Occupancy Housing (family housing) to determine the applicant's ability to care for the unit. A failed home visit will be grounds for denial.

3-III.E. CRITERIA FOR DECIDING TO DENY ADMISSION

EVIDENCE

PHA Policy

The PHA may not rely solely on an arrest record to deny admission, terminate assistance, or evict tenants. When denying admission or terminating assistance, the PHA must look at other factors in addition to the arrest record such as police reports, witness statements, testimony, etc. *[PIH Notice 2015-19]*

The PHA will use the preponderance of the evidence as the standard for making all admission decisions.

Preponderance of the evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not. Preponderance of the evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

CONSIDERATION OF CIRCUMSTANCES *[24 CFR 960.203(c) (3) and (d)]*

HUD authorizes the PHA to consider all relevant circumstances when deciding whether to deny admission based on a family's past history except in the situations for which denial of admission is mandated (see Section 3-III.B).

In the event the PHA receives unfavorable information with respect to an applicant, consideration must be given to the time, nature, and extent of the applicant's conduct (including the seriousness of the offense). In a manner consistent with its policies, the PHA may give consideration to factors which might indicate a reasonable probability of favorable future conduct.

PHA Policy

The PHA will consider the following facts and circumstances prior to making its decision:

1. The seriousness of the case, especially with respect to how it would affect other residents' safety or property.
2. The effects that denial of admission may have on other members of the family who were not involved in the action or failure to act.
3. The extent of participation or culpability of individual family members, including whether the culpable family member is a minor or a person with disabilities, or (as discussed further in section 3-III.F) a victim of domestic violence, dating violence, sexual assault, or stalking.

4. The length of time since the violation occurred, including the age of the individual at the time of the conduct, as well as the family's recent history and the likelihood of favorable conduct in the future.
5. While a record of arrest(s) will not be used as the sole basis for denial, an arrest may, however, trigger an investigation to determine whether the applicant actually engaged in disqualifying criminal activity. As part of its investigation, the PHA may obtain the police report associated with the arrest and consider the reported circumstances of the arrest. The PHA may also consider:
 - Any statements made by witnesses or the applicant not included in the police report.
 - Whether criminal charges were filed.
 - Whether, if filed, criminal charges were abandoned, dismissed, not prosecuted, or ultimately resulted in an acquittal.
 - Any other evidence relevant to determining whether or not the applicant engaged in disqualifying activity.

Evidence of criminal conduct will be considered if it indicates a demonstrable risk to safety and/or property.

6. Whether the applicant is compliant with probation requirements.
7. Evidence of the applicant family's participation in or willingness to participate in social service case management or other appropriate counseling service programs.
8. In the case of drug or alcohol abuse, whether the culpable household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program or has otherwise been rehabilitated successfully.

The PHA will require the applicant to submit evidence of the household member's current participation in or successful completion of a supervised drug or alcohol rehabilitation program, or evidence of otherwise having been rehabilitated successfully.

REMOVAL OF A FAMILY MEMBER'S NAME FROM THE APPLICATION

Should the PHA's screening process reveal that an applicant's household includes an individual subject to state lifetime or mandatory registered sex offender registration, the PHA must offer the family the opportunity to remove the ineligible family member from the household. If the family is unwilling to remove that individual from the household, the PHA must deny admission to the family [*Notice PIH 2012-28*].

For other criminal activity, the PHA may permit the family to exclude the culpable family members as a condition of eligibility. *[24 CFR 960.203(c)(3)(i)]*.

PHA Policy

As a condition of receiving assistance, a family may agree to remove the culpable family member from the application. In such instances, the head of household must certify that the family member will not be permitted to visit or to stay as a guest in the public housing unit.

After admission to the program, the family must present evidence of the former family member's current address upon PHA request.

REASONABLE ACCOMMODATION *[PH Occ GB, pp. 58-60]*

If the family includes a person with disabilities, the PHA's decision concerning denial of admission is subject to consideration of reasonable accommodation in accordance with *[24 CFR Part 8]*.

PHA Policy

If the family indicates that the behavior of a family member with a disability is the reason for the proposed denial of admission, the PHA will determine whether the behavior is related to the disability. If so, upon the family's request, the PHA will determine whether alternative measures are appropriate as a reasonable accommodation. The PHA will only consider accommodations that can reasonably be expected to address the behavior that is the basis of the proposed denial of admission. See Chapter 2 for a discussion of reasonable accommodation.

3-III.F. PROHIBITION AGAINST DENIAL OF ASSISTANCE TO VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING

The Violence against Women Act of 2013 (VAWA) and the HUD regulation at [24 CFR 5.2005(b)] prohibit Public Housing Agencies from denying admission to an otherwise qualified applicant on the basis that the applicant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking.

Definitions of key terms used in VAWA are provided in section 16-VII of this ACOP, where general VAWA requirements and policies pertaining to notification, documentation, and confidentiality are also located.

NOTIFICATION

VAWA 2013 expanded notification requirements to include the obligation for Public Housing Agencies to provide applicants who are denied assistance with a notice of **VAWA** rights and the form HUD-50066 at the time the applicant is denied.

PHA Policy

The PHA acknowledges that a victim of domestic violence, dating violence, sexual assault, or stalking may have an unfavorable history (e.g., a poor credit history, a record of previous damage to an apartment, a criminal record) that would warrant denial under the PHA's policies. Therefore, if the PHA makes a determination to deny admission to an applicant family, the PHA will include in its notice of denial information about the protection against denial provided by VAWA in accordance with section 16-VII.C of this ACOP, a notice of VAWA rights, a copy of the form HUD-50066. The PHA will request, in writing, that an applicant wishing to claim this protection notify the PHA within 10 business days.

DOCUMENTATION

Victim Documentation [24 CFR 5.2007]

PHA Policy

If an applicant claims the protection against denial of admission that VAWA provides to victims of domestic violence, dating violence, sexual assault, or stalking, the PHA will request in writing that the applicant provide documentation supporting the claim in accordance with section 16-VII.D of this ACOP.

PERPETRATOR DOCUMENTATION

PHA Policy

If the perpetrator of the abuse is a member of the applicant family, the applicant must provide additional documentation consisting of one of the following:

- **To Remove.** A signed statement (1) requesting that the perpetrator be removed from the application and (2) certifying that the perpetrator will not be permitted to visit or to stay as a guest in the public housing unit
- **To Remain.** Documentation that the perpetrator has successfully completed, or is successfully undergoing, rehabilitation or treatment. The documentation must be signed by an employee or agent of a domestic violence service provider or by a medical or other knowledgeable professional from whom the perpetrator has sought or is receiving assistance in addressing the abuse. The signer must attest under penalty of perjury to his or her belief that the rehabilitation was successfully completed or is progressing successfully. The victim and perpetrator must also sign or attest to the documentation.

3-III.G. NOTICE OF ELIGIBILITY OR DENIAL

The PHA will notify an applicant family of its final determination of eligibility in accordance with the policies in Section 4-III.E.

If a PHA uses a criminal record or sex offender registration information obtained under 24 CFR 5, Subpart J, as the basis of a denial, a copy of the record must precede the notice to deny, with an opportunity for the applicant to dispute the accuracy and relevance of the information before the PHA can move to deny the application. In addition, a copy of the record must be provided to the subject of the record [24 CFR 5.903(f) and 5.905(d)].

PHA Policy

If, based on a criminal record or sex offender registration information an applicant family appears to be ineligible, the PHA will notify the family in writing of the proposed denial using an *Intent To Deny* letter and provide a copy of the record to the applicant and to the subject of the record. The family will be given 10 business days to dispute the accuracy and relevance of the information. If the family does not contact the PHA to request a hearing to dispute the information within that 10 day period, the PHA will proceed with issuing the *Determination of Ineligibility* letter (denial letter) to the applicant. A family that does not exercise their right to dispute the accuracy of the information prior to issuance of the official denial letter will still be given the opportunity to do so as part of the informal hearing process.

Notice requirements related to denying admission to noncitizens are contained in Section 3-II.B.

Notice policies related to denying admission to applicants who may be victims of domestic violence, dating violence, sexual assault, or stalking are contained in Section 3-III.F.

NEW ACTIVITIES

Revision of ACOP's Chapter 3 (Admissions/Screening):

In an effort to remove barriers to affordable housing for those formerly incarcerated and those with criminal records, the Providence Housing Authority (PHA) has developed proposed amendments to their admissions policy along with other minor changes within the policy. The proposed admission policy changes have also triggered HUD's requirements to include the proposed policy as part of our upcoming Annual Plan. Both the Annual Plan and the Admission Policy have been put out for public comment beginning January 30, 2017. The entire chapter revision (changes highlighted) is attached.

The following is a summary of the most significant proposed changes:

1. **ELIMINATE** automatic applicant denials for criminal history
2. **ELIMINATE** the PHA's ONE STRIKE RULE
3. **REDUCE** 10 YEAR LOOK BACK PERIOD TO **5 YEARS** since date of conviction for violent criminal or drug related activity
4. **ELIMINATE** any consideration of **MISDEMEANOR CRIMES**
5. **ELIMINATE** denials based solely on arrests
6. **ALLOW** applicant households to remove any culpable household members as a condition of eligibility
7. **CREATE** a deferral status for those charged pending adjudication
8. **IMPLEMENT** more tolerant definition of currently engaged in illegal drug use; reduce to 6 months vs 2 years

PLEASE SEE ATTACHED CHAPTER 3 DETAILING THE CHANGES OUTLINED ABOVE.

Choice Neighborhoods/Rental Assistance Demonstration Program:

The PHA was past recipient of the one of the nation's first Choice Neighborhoods Planning Grants (2010) for the Manton Heights public housing site and the Olneyville neighborhood. The PHA officially submitted the final Transformation Plan (called the "Build Olneyville Plan") to HUD on June 27, 2014. The Build Olneyville Plan's housing component included a financing component through the Rental Assistance Program. In February 2016, the PHA and key partners applied for the Choice Neighborhood Initiative Planning & Action Grant but were denied.

The PHA will continue to evaluate and explore available redevelopment and revitalization housing and financing opportunities such as the Rental Assistance Demonstration the Choice Neighborhood Initiative programs in the future.

Disposition

A disposition application was submitted by the Housing Authority to and approved by HUD in 2007 for a small portion of land located behind its' elderly high-rise building known as Dominica Manor (AMP 6) in order to permit a neighboring land owner, Talon Realty, LP, to construct shared parking facilities in conjunction with its proposed construction of a new commercial and residential development to be known as Vista Delle Torre. In January 2012, the PHA entered into a Conveyance and Easement Agreement with Talon Realty, LP that granted to it the right to right to obtain ownership to the designated portion of land with the understanding that it would pay a fee to the PHA and provide 50

spaces of reserved parking for Dominica Manor residents upon completion of construction. In March 2015, the PHA learned that the Vesting Period specified in its Agreement (which was based on the then current Zoning Ordinance of the City of Providence) was delayed pursuant to State law with passage of R.I.G.L. §45-24-61.1. The Housing Authority currently awaits further action by the Talon Realty, LP or the final expiration of its building and zoning approvals.

Designation Housing Renewal Plan

The PHA intends to renew its Elderly Only Housing Designation for Dominica Manor and Carroll Tower. The current Plan expires July 2017 and the renewal information is due to HUD by April 2017.

Over-income Families:

Although the PHA has a very low number of over-income families in their resident population (7 households of 2,601), over-income families living in public housing has emerged as a national topic of interest. The issue: Do the over-income families living in public housing units detract from the provision of assistance to low-income families in need of affordable housing (there are currently 5,009 applicants on the waiting list) or do over-income families promote social and economic diversity/variety among public housing authority communities?

In February 2016, HUD published a proposed rule seeking comments regarding how HUD can structure policies to reduce the number of individuals and families whose incomes significantly exceed the income limit for sustained periods of time after initial admission. The PHA anticipates a Final Rule from HUD regarding this issue and will develop a policy accordingly.

Smoke-Free Policy:

As implemented in 65% of the PHA's public housing portfolio, the PHA implemented a smoking ban in Manton Heights (with the assistance of the RI Department of Health and One Neighborhood Builder's *Health Equity Zone Grant* funds) and Scattered Sites in December 2016. The PHA will implement a new, smoking ban (with appropriate resident and staff engagement) in Hartford Park by June 2018. This will complete the PHA's Smoke-Free public housing portfolio. The PHA will also evaluate all DSAs to comply with HUD's rule that DSAs are at least 25ft. from buildings.

Project Based Vouchers:

In May 2016, the PHA's Board established an ad hoc committee in order to explore various strategies to meet community housing needs such as the homeless, veterans, victims of domestic violence and elderly/disabled.

2017 HUD Emergency Safety and Security Grants:

Typically, the PHA applies for \$250K to address the authority wide community need for improved security with the following items: installation of exterior cameras at Hartford Park where needed, interior security cameras (136) on all floors of the six high-rise buildings, digital enhancement of the existing surveillance/ monitoring system in the security unit and required upgrades for the supporting fiber optic equipment. The NOFA is expected to be released in late February 2016.

HUD's Juvenile Re-Entry Assistance Program:

Through a partnership between, the Department of Housing & Urban Development (HUD), the U.S. Office of Juvenile Justice & Delinquency Prevention (JJDP), Rhode Island Legal Services (RILS) and the PHA, the Juvenile Reentry Assistance Program (JRAP) has been established. JRAP seeks to reduce barriers to housing and employment among justice-involved youth up to the age 24 residing in public housing (or who would be residing in public housing but for their juvenile or criminal record). The services provided through JRAP are expunging, sealing and/or correcting juvenile or adult records as permitted by State law, coordinating support services to assist target youth in mitigating or preventing collateral consequences such as: Reinstated revoked or suspended drivers' licenses, counseling regarding legal rights and obligations in search for employment and providing guidance for readmission to school.

The PHA's role in the program is to announce and promote the availability of JRAP services through: Property Management, the Resident Service Coordinator (RSC) Program, Adult Education/Training Program, Family Self Sufficiency (FSS) Program, Financial Opportunity Center (FOC) Program, to refer JRAP participants to PHA and partner programs, to track progress towards program performance measures, to evaluate overall successes and challenges of the program and to submit progress and financial reports to HUD.

Jobs Plus Program:

The Providence Housing Authority is one of six public housing authorities in the country selected by the U.S. Department of Housing and Urban Development to participate in Jobs Plus, a federally-funded initiative to assist public housing residents enter the workforce. The PHA is excited and eager to launch the Jobs Plus Providence (JPP) program with \$3M in grant funding over 48 months in the Hartford Park and Manton Heights family developments.

An extensive network of partners have joined forces with aligned visions to create the JPP program which aims to increase residents' earned income and advance employment gains by effectively integrating the three main components of the Job Plus Initiative: employment related services; financial incentives and the creation of a network of peer and community "supports for work".

The JPP program incorporates workforce development strategies to help the unemployed secure jobs by offering industry-driven training programs, apprenticeships, progressive education and credentialing pathways. The agency identified local partners to deliver comprehensive employment-related services in five areas: (1) employment readiness, (2) job training; (3) job placement; (4) job retention and advancement, and (5) work-enabling services.

Job Plus Providence will maximize access to critical supportive resources among public housing residents such as child care, counseling and mental health services and citizenship preparation. The program will financially encourage participants through what is called earned income disregard, which allows increased earnings without increased rent for the grant period of 4 years.

Also vital to JPP's success will be genuine resident engagement through the formation of a Mentor Advisory Board and the employment of four new Community Coaches. The PHA believes that

community and peer involvement will be an essential ingredient for strategic program outreach and acceptance that will lead to achievable outcomes in the target sites.

The PHA is joined by 14 community partners in the JPP effort including the City of Providence, Providence/Cranston Workforce Solutions, Network RI (requirement of grant), the RI Department of Labor, Family Service of Rhode Island, Boys & Girls Club of Providence, Children's Friend and Service RI, GroundWork Providence, RI Family Literacy Initiative, Stepping Up Rhode Island, the Genesis Center, Sherwin Williams, Building Futures and Comprehensive Community Action Program.

**Certifications of Compliance with
PHA Plans and Related Regulations
(Standard, Troubled, HCV-Only, and
High Performer PHAs)**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 02/29/2016

**PHA Certifications of Compliance with the PHA Plan and Related Regulations including
Required Civil Rights Certifications**

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 ___ 5-Year and/or Annual PHA Plan for the PHA fiscal year beginning 7/1/2016, 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 Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
5. The PHA certifies that it 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.
6. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those programs, addressing 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 by maintaining records reflecting these analyses and actions.
7. For PHA Plans that includes a policy for site based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2010-25);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing;
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
8. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
9. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
10. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
11. 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.

12. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
13. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
14. 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.
15. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
16. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
17. 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), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
18. 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 regulations and included in its Plan.
19. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA 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 PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

Providence Housing Authority

RI 1001

PHA Name

PHA Number/HA Code

Annual PHA Plan for Fiscal Year 2017

5-Year PHA Plan for Fiscal Years 20__ - 20__

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

Title

Nicholas Retsinas

Chairman, Board of Commissioners

Signature

Nicholas P. Retsinas

Date

5 APR 17

Civil Rights Certification
(Qualified PHAs)

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB Approval No. 2577-0226
Expires 02/29/2016

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official, I approve the submission of the 5-Year PHA Plan for the PHA of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the public housing program of the agency and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency 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, and will affirmatively further fair housing by examining their programs or proposed programs, identifying any impediments to fair housing choice within those program, addressing those impediments in a reasonable fashion in view of the resources available and working with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and by maintaining records reflecting these analyses and actions.

PROVIDENCE HOUSING AUTHORITY

PHA Name

RI 1001

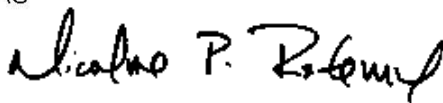
PHA Number/HA Code

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Name of Authorized Official

NICOLAS RETSINAS

Signature



Title

CHAIRMAN OF THE BOARD OF COMMISSIONERS

Date

April 5, 2017

FY2017 Update on Meeting Goals & Objectives:

Update on meeting the PHA's organizational goals and objectives:

- 1. Continue to operate and adhere with federal, state and local mandates as well as formal regulations associated with public housing authorities.**
- 2. Continue to (1) research and explore modern, affordable housing strategies and programs, (2) generate opportunities with public, non-profit and private partnerships that result in the creation of affordable housing and (3) seek membership in appropriate organizations advocating for affordable housing (Choice, comprehensive neighborhood revitalization initiatives, the Rental Assistance Demonstration).** **UPDATE:** (1) The PHA completed its most recent Green Physical Needs Assessment which will allow the PHA a more focused consideration and feasibility of the Rental Demonstration Program. The PHA continually seeks available and viable redevelopment and revitalization opportunities to enhance affordable housing (applied for Choice Action Grant in 2016). (2) In May 2016, the PHA's Board established an ad hoc committee in order to explore various strategies to meet community housing needs such as the homeless, veterans, victims of domestic violence and elderly/disabled. (3) The PHA assigned development rights to SWAP and the Family Housing Development Corporation (FHDC) to develop affordable housing on 9 vacant lots adjacent to the Roger Williams site (AMP 02). The project includes a homeownership component and development is underway. (4) The PHA is once again joining forces with Trinity Financial regarding Section 3 compliance and Jobs Plus job training and employment opportunities related to their new affordable housing development (60 King Street: 60 units of low-income housing) adjacent to Manton Heights (AMP 04).
- 3. Continue to create, maintain and nourish sustainable partnerships with community stakeholders in order to increase opportunities that positively impact PHA residents, properties and employees.** **UPDATE:** The PHA continues to maintain and establish an extensive variety of partnerships that positively impact the residents, properties and employees. For example: (1) The PHA partnered with RI Housing in order to "jointly" open their Section 8 waiting list to Providence and Rhode Island communities. For more than one week, the PHA and RIH offered both online applications and in person application assistance to the public. There were 11,777 applications were received and a public lottery was conducted where 5,000 names were collected by each agency. (2) The PHA is participating in a national challenge called the Working Cities Challenge with the City of Providence. Providence has almost 8,000 unemployed residents many of whom are people of color, more likely to live below the poverty level, and have a high school degree or less. The PHA's Jobs Plus program could support and strengthen the Working City Challenge competitive grant process, an economic development effort designed to strengthen cross sector collaboration and leadership in the Ocean State's postindustrial cities.
- 4. Continue to provide quality service to meet stakeholder expectations through conducting a comprehensive service satisfaction survey, updating operational goals and monitoring performance management indicators.** **UPDATE:** The PHA has expanded its partnership with

the City around affordable housing concerns and PHA facilities improvements using CDBG funding. The PHA conducts surveys regarding various programs and continues to engage the Resident Advisory Board (RAB) regarding new policy and program ideas. PHA staff conferred with the City's Planning and Development Department to strategically address the required Furthering Affirmative Fair Housing Rule and Section 3 requirements.

- 5. Continue to cultivate Resident Advisory Board and Resident Association relations and communication to maintain transparency and provide a forum for valuable resident participation in planning activities guided by PHA goals and objectives. UPDATE:** In FY 2016-FY 2017, the PHA Resident Representatives Nomination process took place again. In this process, the PHA led an official nomination procedure to coordinate an authority-wide resident representative campaign. This campaign was used to inform and assemble a list of interested residents to represent their developments on the PHA's Board of Commissioners. During this process, residents were provided bilingual informational packets highlighting the purpose of each committee. As a result, there were nine residents nominated for consideration, by the Mayor, for the Board of Commissioners.
- 6. Continue to improve the appearance of PHA properties, reduce work order and unit turn-around time, reduce energy consumption and costs as well as conduct authority wide inspections and proper procurement processes. UPDATE:** During FY 2016, there were 33,914 work order (WO) requests; this was a decrease of 38 work orders (33,952) from FY 2015. The average length of time to complete a WO was 7 days; a reduction of three days per WO from previous year (10). There were 328 vacant units Authority wide, a decrease of 51 units (379) from the year before. The average vacancy days for unit turn around in FY 2016 were 56 Days; this is a decrease of one day (57 days) from FY 2015. Although there was a decrease in the total number vacancies and turn around days, this number is still high and is contributed to by the number of extensive interior repairs (floors) at Scattered Sites; Facilities Management is working hard to reduce the total number of turn around days for FY 2017. The FY 2016 consumption profile for the Energy Performance Contract (based on utility consumption and cost) showed contract compliance and a net energy savings of \$211,598K, a 53% decrease from the previous year's savings (\$398,000). In the seven years of EPC contract, the PHA has saved more than \$2.2M. An authority wide Physical Needs Assessment/Green Needs Assessment was completed in 2016 and forwarded to HUD; a full report was provided and will be a valuable tool creating future capital needs budgets. The FY 2016 PHAS scores remained steady at 86, with a physical score of 28 out of 40.
- 7. Continue to maintain public housing occupancy rates above 97%, stream line the application process and improve tenant collections. UPDATE:** The PHA's Property Management Department has consistently met or exceeded the occupancy goal of 97%. FY 2016 ended with an overall occupancy rate of 98.4% (also reflected in the individual AMPs consistently). In FY 2016, the PHA leased 269 units and vacated 255 units for a net gain of 14 occupied units. Property Management staff participated in the annual EIV security awareness training, received in-house policy training and 4 staff members successfully received their certification in public housing management (PHM) through Nan McKay. Throughout FY 2016, 1,192 applications for public housing were processed and an additional

1,276 pre-applications were received. Management persistently follows the legal process to collect rents and ended FY 2016 with an authority wide collection rate of 99%.

- 8. Continue to maintain Section 8 leasing rates (at least 95%), monitor the de-concentration policy and rent reasonableness standards, develop innovative methods to re-open the waiting list, maximize administrative fees, expand the VASH voucher program and refer participants to the Family Self-Sufficiency and Homeownership Programs. UPDATE:** Leased Housing/Section 8 leasing rates continued to be high (at 96%) and for the 14th consecutive year received High Performer SEMAP score. The staff administers a total of 209 VASH including a new allocation of 21 VASH Vouchers. There are 70 FSS participants and 50 participants in the Homeownership Program. PHA and Rhode Island Housing accomplished an innovative method to have a joint opening of the Section 8 waiting list in the fall of 2016. The joint effort served as a pilot program for the Centralized Waiting List for the State; the combined waitlist totaled over 13,000 computer generated applications.
- 9. Continue to address the education, economic, social services and healthcare needs of youth, adults, and the elderly and disabled populations through direct service, referrals and creative partnerships. The PHA will increase homeownership rates (PH, S8) and explore the Job Plus Pilot Program and opportunities for new digital literacy and youth programming. UPDATE:** Through its Resident Services Department, last year the PHA served 134 students in its Adult Education and Training Program and nearly 150 clients received one-on-one financial coaching and employment support services through its Financial Opportunity Center. Family Self-Sufficiency program enrolled 148 participants and digital literacy is integrated into all of the PHA's programs (for adults and youth) and computer labs have been established in the majority of the PHA's developments. Programming for youth, provided through the PHA's partnership with the Providence Boys and Girls Club, continues and includes licensed childcare to meet the needs of working families and a summer camp program. Additional partnerships that enhance the resident and community resources are the City of Providence's Health Communities Office's Providence Talks program offered to 42 families and the Rhode Island Public Health Institute offers elderly/disabled high-rises access to a mobile produce truck monthly. In 2016, the PHA submitted an application to the 2016 Jobs Plus Program for the Hartford Park and Manton Heights family developments.
- 10. Continue to provide security and safety to residents by advocating for more housing unit officers, nourishing community relations, maintaining partnerships with federal, state and local law enforcement agencies, tracking and monitoring crime trends and seeking funding opportunities to support and enhance safety initiatives and methods. UPDATE:** The PHA will apply for the HUD Emergency Safety and Security Grant once the application becomes available. Funding will be used to increase the amount of security cameras and enhance technology. In FY 2016, the PHA, the Providence Police Department, and the National American Family Institute (NAFI) worked together to graduate one class of eighteen Hartford Park and Manton Heights youth from the Youth Police Initiative (YPI) Program. The resident crime watches that were established in 2009 continue to operate smoothly and regular

meetings with PHA residents were held throughout FY 2016. The goal of the meetings is to strengthen the relationship between officers and residents.

- 11. Continue to ensure adherence of legal risk management, safety and insurance best practices as well as maintain the PHA Safety Committee to promote policies to make the PHA a safe and healthy place to live and work. UPDATE:** The PHA's Risk Control Manager continues to assist in the review, investigation, reporting and resolution of all reports of incident/claim matters involving property damages and/or personal injury. The PHA's Safety Committee meets quarterly to review and assess reported incidents, to coordinate bi-annual self-inspections, and to plan and conduct annual resident fire safety training held in each development along with the Providence Police Department or the State Fire Marshal. The Authority provides staff with weekly summary reports of security and public safety officers' activities. The PHA's Risk Control Manager also reviewing, conducting research and is assisting in the drafting of policies and procedures to adopt, implement and promote regulatory changes and directives relative to Procurement, Section 3 goals and objectives, and Affirmatively Furthering Fair Housing initiatives.
- 12. Continue to maintain and improve finance procedures to assure regulatory compliance, refine reporting systems (based on the most recent audit review), advance department cross training and improve the newly acquired payroll system. UPDATE:** In FY 2016, the Finance Department implemented and reorganized financial operating statements through major program and introduced several financial metrics to be monitored in a historical framework, providing a major improvement in management information and analytics. Training was completed for all staff levels in effort to improve technical program knowledge and general professional development. The payroll systems have been fully implemented and procedures for workflow and quality assurance within that system and its interface to PHA systems have been developed.
- 13. Continue to maintain, reorganize and improve the general infrastructure of the organization and ensure compliance with Section 3 requirements. UPDATE:** The PHA continually seeks improvement and efficiency through reorganization and evaluation of existing operating procedures and functions in order to ensure compliance and improve ways to produce successful outcomes of agency goals and objectives. PHA employees have participated in more than 100 training opportunities (examples: safety, professional development and compliance) in the past year. In November 2016, key staff members attended a local, HUD Section 3 Training and the PHA is working with the City of Providence in order to enhance its Section 3 processes. The PHA is working to resolve its recent Section 3 reporting issues in order to comply with Section 3 reporting requirements.
- 14. Continue (1) to ensure that the PHA computer hardware, software and network are updated and upgraded to maximize operational efficiency, (2) maintain a secure digital environment and (3) provide support and technological tools to employees and residents of the PHA. UPDATE:** To ensure the security of the PHA Network, the PHA Firewall has been replaced in order to adhere to best practices recommendations regarding Firewall hardware and software. New Virtual Environment hardware has been received which will replace the

existing hardware; a RFP has been published for services to configure this new hardware to VMware best practices. This project also includes testing the Disaster Recovery (DR) plan to ensure should one location (Dexter or Hartford) fail critical servers will start up at the other location with minimal staff assistance. A Password Policy was put in place in January 2016. Computers have been upgraded to Windows 2010; and older computers, printers and UPS's (Uninterrupted Power Supply) have been replaced throughout the agency. Lastly, staff is encouraged to report any software, computer, printer, fax, camera, phone and Internet usage problems or questions through the centralized Manage Engine software.

SECTION F:

MARCH 22, 2017 RESIDENT ADVISORY BOARD COMMENTS

PROVIDENCE HOUSING AUTHORITY

FY 2017 ANNUAL PLAN AND ADMISSION POLICY

RESIDENT ADVISORY BOARD COMMENTS

On March 22, 2017 the Providence Housing Authority (PHA) met with 11 Resident Advisory Board (RAB) members at the PHA's Board Room located at 100 Broad Street. The majority of the comments were in reference to the proposed Admissions Policy (Chapter 3). In summary, there were 7 members who agree with the policy amendment (one suggested further reducing look back period to 3 years), one who thought it was a good policy but risky, one who recommended lengthening the amount of time for sobriety for applicants with substance abuse issues, one who was against the proposed policy and one who encouraged the PHA to be clear about the consideration of misdemeanors and arrest records.

The full RAB Comments were as follows:

1. The PHA did a wonderful job thinking about this policy and evaluating how it would give people a second chance. People do deserve a second chance. The PHA works with the people, includes them in the process. I like the interviews and hearing process for applicants with criminal records.
2. Please keep everything the same—keep the current admissions policy—10 year look back.
3. This makes for the PHA to help people live well, keep doing what you have to do, everyone work together. This is a good thing.
4. The proposed policy is good but it is risky. I would like to see how we can make it less risky.
5. People should be allowed a second chance coming into housing. The PHA policy look back should be 3 years. I think adding a family member should go through the same screening process as the head of household. I think that the PHA should look carefully about new members coming into housing. PHA has done a good job as putting new members in housing. As far as sex offenders, that's a big problem lately, not just with housing.
6. I feel all revised procedures for 2017 Annual Plan are fair and should move forward. Clarify procedure vs. policies.
7. Compassionate for household and children, educate the communities to welcome them and PHA to enforce it. I go along with the PHA policy.

8. I do not agree that people are in a court process for drugs would be on the waiting list because they can bring them here. There is a lot of drugs around the areas of housing. In my opinion, is that these types of people do not need a chance. We don't need these problems in housing. PHA policy for drug users being rehabilitated should be 3 years minimum.
9. I liked it. It is good to give an opportunity or second opportunity that way people will learn how to appreciate themselves and others and know how to care about others.
10. It is sufficiently satisfactory and well-grounded to help the population. It is humanitarian. I hope that his is effective within the next year. It will be beneficial to the community.
11. We need to be clear and correct on misdemeanors and with people's arrest record considerations. If the PHA makes a mistake, they should correct it and inform the person. If this is approved or not, keep working on this matter.

PHA Response: The Department of Housing and Urban Development (HUD) has encouraged public housing authorities to adopt admission policies that achieve a sensible and effective balance between allowing individuals with a criminal record to access HUD-subsidized housing and ensuring the safety of all residents of such housing.

The PHA recognizes that its Admissions policy is outdated and has changed it in order to be more lenient. On March 23, 2017, the Board of Commissioners resolved to approve the new Admissions Policy with the clause that the PHA will track and measure the Policy's effectiveness and impact over the next year in order to assess and refine the newly passed Admissions Policy.

**Certification by State or Local
Official of PHA Plans Consistency
with the Consolidated Plan or
State Consolidated Plan
(All PHAs)**

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 2/29/2016

**Certification by State or Local Official of PHA Plans
Consistency with the Consolidated Plan or State Consolidated Plan**

I, BRIAN HULL, the Director of the Division of Community Development
Official's Name *Official's Title*

certify that the 5-Year PHA Plan and/or Annual PHA Plan of the

PROVIDENCE HOUSING AUTHORITY

PHA Name

is consistent with the Consolidated Plan or State Consolidated Plan and the Analysis of
Impediments (AI) to Fair Housing Choice of the

CITY OF PROVIDENCE

Local Jurisdiction Name

pursuant to 24 CFR Part 91.

Provide a description of how the PHA Plan is consistent with the Consolidated Plan or State
Consolidated Plan and the AI.

The PHA is updating the over-income policy, continues the deconcentration plan, established an adhoc
committee to address homelessness and implements healthy housing initiatives. The PHA is also adding

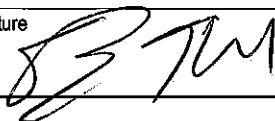
Section 8 preferences for RI residents and domestic violence and intends to improve applicants' access to
housing through a centralized web-based waiting list.

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

BRIAN HULL

Signature



Title

Director of the Division of Community
Development

Date

12-30-2016

Part I: Summary						
THE HOUSING AUTHORITY OF THE CITY OF PROVIDENCE, RI RI 43 P001 50116		Providence, RI		_ Original 5-Year Plan _ Revision No:		
A.	Development Number and Name	Work Statement for Year 1 FFY 2016	Work Statement for Year 2 FFY 2017	Work Statement for Year 3 FFY 2018	Work Statement for Year 4 FFY 2019	Work Statement for Year 5 FFY 2020
B.	Physical Improvements Subtotal	Annual Statement	1,279,784.04	1,280,096.54	1,277,609.04	1,272,446.67
C.	Management Improvements		25,000.00	25,000.00	25,000.00	25,000.00
D.	PHA-Wide Non-dwelling Equipment		60,000.00	60,000.00	60,000.00	60,000.00
E.	Administration		360,000.40	360,000.40	360,000.40	360,000.40
F.	Other		10,000.00	10,000.00	10,000.00	10,000.00
G.	Operations		720,000.80	720,000.80	720,000.80	720,000.80
H.	Demolition					
I.	Development					
J.	Capital Fund Financing – Debt Service		1,145,218.76	1,144,906.26	1,147,393.76	1,152,556.13
K.	Total CFP Funds					
L.	Total Non-CFP Funds					
M.	Grand Total		3,600,004.00	3,600,004.00	3,600,004.00	3,600,004.00

Part II: Supporting Pages – Physical Needs Work Statement(s)						
Work Statement for Year 1 FFY 2016	Work Statement for Year 2017 FFY 2017			Work Statement for Year 2018 FFY 2018		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	RI001000001			RI001000001		
Annual	Chad Brown			Chad Brown		
Statement	Operations	N/A	51,803.59	Operations	N/A	51,803.59
	Mold Remediation	2 units	2,500.00	Mold Remediation	2 units	2,500.00
	Mold Testing	10 units	2,500.00	Mold Testing	10 units	2,500.00
	Exterior Repair/Paint	2 bldgs	10,349.00	Exterior Repair/Paint	1 bldg	5,000.00
	Re-Caulk/Repaint Windows	5 bldgs	10,000.00	Repair/Replace Gas/Water Lines	2 bldgs	7,500.00
	Appliance Purchases	20 units	8,400.00	Re-Caulk/Repaint Windows	4 units	1,000.00
	Repair/Replace Roofs	4 bldgs	20,000.00	Upgrade Kitchens	4 units	10,000.00
	Upgrade LED Lighting	2 units	5,000.00	Appliance Purchases	10 units	4,000.00
	Exterior Stair Repair	4 bldgs	50,000.00	Repair/Replace Roofs	5 bldgs	10,000.00
	Security Cameras	2 cameras	5,000.00	Security Cameras	2 cameras	5,000.00
	Bond Repayment	N/A	51,318.00	Bond Repayment	N/A	51,210.00
	Total		216,870.59	Total		150,513.59
	Subtotal of Estimated Cost		216,870.59	Subtotal of Estimated Cost		150,513.59

Part II: Supporting Pages – Physical Needs Work Statement(s)							
Work Statement for Year 1 FFY 2016	Work Statement for Year 2017 FFY 2017			Work Statement for Year 2018 FFY 2018			
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	
See	Admiral Terrace			Admiral Terrace			
Annual Statement	Operations	N/A	51,803.59	Operations	N/A	51,803.59	
	Repair/Replace Roofs	4 bldgs	25,000.00	Repair/Replace Roofs	1 bldg	10,000.00	
	Repair Gutters/add Guards	2 bldgs	5,000.00	Upgrade Kitchens	4 units	10,000.00	
	Upgrade Kitchens	4 units	10,000.00	Re-Caulk/Repaint Windows	7 bldgs	5,000.00	
	Re-Caulk/Repaint Windows	5 bldgs	10,000.00	Mold Remediation	3 units	2,500.00	
	Mold Remediation	2 units	2,500.00	Mold Testing	10 units	2,500.00	
	Mold Testing	10 units	2,500.00	Appliance Purchase	10 units	4,500.00	
	Appliance Purchase	10 units	4,500.00	Security Cameras	2 cameras	5,000.00	
	Repaint/Seal Exterior	2 units	7,500.00	Bond Repayment	N/A	51,210.00	
	Exterior Stairway Repairs	2 bldgs	30,000.00				
	Security Cameras	2 cameras	5,000.00				
	Bond Repayment	N/A	51,318.00				
	Total		205,121.59	Total		142,513.59	
	Sunset Village			Sunset Village			
	Re-insulate Crawl Space Bays	3 bays	7,500.00	Repaint Exterior Doors/Trim	1 bldg	6,417.00	
	Install Metal Access Doors	2 doors	5,000.00	Security Cameras	2 cameras	5,000.00	
	Security Cameras	2 cameras	5,000.00				
	Total		17,500.00	Total		11,417.00	
	RI001000001 Total		439,492.18	RI001000001 Total		304,444.18	
	Subtotal of Estimated Cost		222,621.59	Subtotal of Estimated Cost		153,930.59	

Part II: Supporting Pages – Physical Needs Work Statement(s)						
Work Statement for Year 1 FFY 2016	Work Statement for Year 2017 FFY 2017			Work Statement for Year 2018 FFY 2018		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	RI001000002			RI001000002		
Annual	Roger Williams			Roger Williams		
Statement	Upgrade Hall Lighting	1 bldg	5,000.00	Repair/Replace Windows	5 units	5,000.00
	Roof Repair	1 bldg	5,000.00	Roof Repair	1 bldg	5,000.00
	Replace doors	2 bldgs	5,000.00	Upgrade Boiler	2 bldgs	40,000.00
	Fire Alarm System Upgrade	1 system	100,000.00	Security Cameras	2 cameras	5,000.00
	Security Cameras	2 cameras	5,000.00			
	Total		120,000.00	Total		55,000.00
	Codding Court			Codding Court		
	Operations	N/A	55,809.73	Operations	N/A	55,809.73
	Mold Remediation	2 units	2,500.00	Mold Remediation	2 units	2,500.00
	Mold Testing	10 units	2,500.00	Mold Testing	10 units	2,500.00
	Interior Repairs	1 bldg	1,000.00	Replace Domestic Water Heaters	4 unit	20,000.00
	Upgrade Hallway Lighting	1 bldg	10,000.00	Repair/Replace Roofs	1 bldg	7,500.00
	Replace Domestic Water Heaters	3 units	10,000.00	Security Cameras	2 cameras	5,000.00
	Repair/Replace Roofs	1 bldg	15,000.00	Bond Repayment	N/A	55,170.00
	Security Cameras	2 cameras	5,000.00			
	Bond Repayment	N/A	55,286.00			
	Total		157,095.73	Total		148,479.73
	Subtotal of Estimated Cost		277,095.73	Subtotal of Estimated Cost		203,479.73

Part II: Supporting Pages – Physical Needs Work Statement(s)							
Work Statement for Year 1 FFY 2016	Work Statement for Year 2017 FFY 2017			Work Statement for Year 2018 FFY 2018			
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	
See	Scattered Sites			Scattered Sites			
Annual	Operations	N/A	55,809.73	Operations	N/A	55,809.73	
Statement	<i>Building Repairs (All Projects)</i>	4 bldgs	130,000.00	<i>Building Repairs (All Projects)</i>	4 bldgs	120,000.00	
Statement	Paint Buildings, Rebuild Porches			Paint Buildings, Rebuild Porches			
	Replace DHW Tanks, Boilers			Replace DHW Tanks, Boilers			
	Repair/Seal Foundation Cracks			Repair/Seal Foundation Cracks			
	Carb Monoxide/Smoke Detectors			Carb Monoxide/Smoke Detectors			
	Replace Windows, Deferred Painting			Replace Windows, Deferred Painting			
	Install Vinyl Siding, Vinyl Floor Tile			Install Vinyl Siding, Vinyl Floor Tile			
	Bond Repayment	N/A	55,286.00	Bond Repayment	N/A	55,170.00	
	Total		241,095.73	Total		230,979.73	
	RI001000002 Total		518,191.46	RI001000002 Total		434,459.46	
	RI001000003 Hartford Park			RI001000003 Hartford Park			
	Operations	N/A	140,353.18	Operations	N/A	140,353.18	
	A & E Fees & Costs Fire Alarm System	1 system	10,000.00	A&E Fees and Costs Fire Alarm System	1 system	10,000.00	
	LBP/Asbestos Testing	5 units	5,000.00	LBP/Asbestos Testing	N/A	5,000.00	
	Walkway repairs	1 bldg	30,126.00	Upgrade Fire Alarm System	1 system	60,000.00	
	Fiber Cable & Wiring	5 bldgs	30,000.00	Upgrade Emerg. Generator-335 Hartford	1 gen.	65,000.00	
	Subtotal of Estimated Cost		241,095.73	Subtotal of Estimated Cost		230,979.73	

Part II: Supporting Pages – Physical Needs Work Statement(s)						
Work Statement for Year 1 FFY 2016	Work Statement for Year 2017 FFY 2017			Work Statement for Year 2018 FFY 2018		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	Hartford Park (continued)			Hartford Park (continued)		
Annual Statement	Exterior Building Repairs	6 bldgs	100,000.00	Exterior Building Repairs	15 bldgs	78,419.00
	LBP Abatement	2 units	5,000.00	LBP Abatement	2 units	5,000.00
	Heat/Domestic HW System Repairs	2 bldgs	15,000.00	Heat/Domestic HW System Repairs	1 unit	13,506.00
	Upgrade Fire Alarm System	1 system	80,000.00	Security Cameras	2 cameras	5,000.00
	Upgrade LED Lighting	3 bldgs	10,000.00	Bond Repayment (FM/Res Svs Bldgs)	N/A	433,156.26
	Security Cameras	2 cameras	5,000.00	Bond Repayment (CFFP)	N/A	138,745.00
	Bond Repayment (FM/Res Svs Bldgs)	N/A	431,968.76			
	Bond Repayment (CFFP)	N/A	139,037.00			
	RI001000003 Total		1,001,484.94	RI001000003 Total		954,179.44
	RI001000004 Manton Heights			RI001000004 Manton Heights		
	Operations	N/A	91,174.31	Operations	N/A	91,174.31
	Mold Remediation	2 units	2,500.00	Mold Remediation	3 units	5,000.00
	Mold Testing	10 units	2,500.00	Mold Testing	10 units	2,500.00
	Upgrade Exit signs/egress lighting	10 bldgs	10,000.00	Exterior Building Repairs	4 bldgs	20,000.00
	DHW Boiler Replacement	2 boilers	55,200.00	Upgrade Exterior lighting	1 bldg	7,500.00
	Repair/Replace Gas/Water Lines	4 bldgs	20,000.00	Repair/Replace Gas/Water Lines	1 unit	10,000.00
	Repair/Replace ext window screens	1 bldg	5,000.00	Exterior Repairs/Paint	1 bldg	5,000.00
	Upgrade LED Lighting	3 bldgs	10,000.00	Interior Repairs Mgmt Office	1 unit	5,000.00
	Subtotal of Estimated Cost		1,001,484.94	Subtotal of Estimated Cost		954,179.44

Part II: Supporting Pages – Physical Needs Work Statement(s)						
Work Statement for Year 1 FFY 2016	Work Statement for Year 2017 FFY 2017			Work Statement for Year 2018 FFY 2018		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	Manton Heights (continued)			Manton Heights (continued)		
Annual	Repair/Replace Roof on Brick Bldgs	1 bldg	50,000.00	Repair/Replace Roof on Brick Bldgs	1 bldg	50,000.00
Statement	Repair/Replace Doors and Hardware	2 bldgs	15,000.00	Repair/Replace Doors and Hardware	25 units	10,000.00
	Security Cameras	2 cameras	5,000.00	Security Cameras	2 cameras	5,000.00
	Bond Repayment	N/A	90,320.00	Bond Repayment	N/A	90,130.00
	RI001000004 Total		356,694.31	RI001000004 Total		301,304.31
	RI001000005 Dexter Manor			RI001000005 Dexter Manor		
	Operations	N/A	80,399.17	Operations	N/A	80,399.17
	Appliance Upgrade	10	5,000.00	Upgrade Windows	9 units	25,000.00
	Upgrade Kitchens	15 units	20,000.00	Elevator Modernization	3 elev.	400,000.00
	Security Cameras	2 cameras	5,000.00	Security Cameras	2 cameras	5,000.00
	Bond Repayment	N/A	79,645.00	Bond Repayment	N/A	79,478.00
	RI001000005 Total		190,044.17	RI001000005 Total		589,877.17
	Subtotal of Estimated Cost		546,738.48	Subtotal of Estimated Cost		891,181.48

Subtotal of Estimated Cost 386,951.27

Subtotal of Estimated Cost 363,588.77

Part II: Supporting Pages – Physical Needs Work Statement(s)						
Work Statement for Year 1 FFY 2016	Work Statement for Year 2017 FFY 2017			Work Statement for Year 2018 FFY 2018		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	RI001000008 Kilmartin Plaza			RI001000008 Kilmartin Plaza		
Annual	Operations	N/A	29,286.30	Operations	N/A	29,286.30
Statement	Interior repairs Community Room	1 unit	27,322.00	Repair/Replace Windows	6 units	10,000.00
	Appliance Upgrade	10	5,000.00	Appliance Upgrade	10	5,000.00
	Security Cameras	2 cameras	5,000.00	Security Cameras	2 cameras	5,000.00
	Bond Repayment	N/A	29,012.00	Bond Repayment	N/A	28,951.00
	RI001000008 Total		95,620.30	RI001000008 Total		78,237.30
	RI001000009 Parenti Villa			RI001000009 Parenti Villa		
	Operations	N/A	53,599.45	Operations	N/A	53,599.45
	Upgrade Fire Doors	4 units	28,402.00	Upgrade Entrance Lobby	1 unit	5,000.00
	Paint Stairwells	2 stairs	37,500.00	Appliance Upgrade	10	5,000.00
	Handicapped Unit Renovation	1 unit	43,926.52	Handicapped Unit Renovation	1 unit	43,926.52
	Appliance Upgrade	10	5,000.00	Elevator Improvements/Repairs	1 unit	23,402.00
	Security Cameras	2 cameras	5,000.00	Security Cameras	2 cameras	5,000.00
	Bond Repayment	N/A	53,097.00	Bond Repayment	N/A	52,985.00
	RI001000009 Total		226,524.97	RI001000009 Total		188,912.97
	CFP Administrative Costs		360,000.40	CFP Administrative Costs		360,000.40
	Subtotal of Estimated Cost		3,575,004.00	Subtotal of Estimated Cost		3,575,004.00

Part II: Supporting Pages – Physical Needs Work Statement(s)						
Work Statement for Year 1 FFY 2016	Work Statement for Year 2019 FFY 2019			Work Statement for Year 2020 FFY 2020		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	RI001000001 Chad Brown			RI001000001 Chad Brown		
Annual Statement	Operations	N/A	51,803.59	Operations	N/A	51,803.59
	Mold Remediation	2 units	2,500.00	Mold Remediation	2 units	2,500.00
	Mold Testing	10 units	2,500.00	Mold Testing	10 units	2,500.00
	Exterior Repair/Paint	1 bldg	5,000.00	Exterior Repair/Paint	1 bldg	5,000.00
	Repair/Replace Gas/Water Lines	3 bldgs	10,000.00	Repair/Replace Gas/Water Lines	3 bldgs	10,000.00
	Re-Caulk/Repaint Windows	4 units	5,000.00	Re-Caulk/Repaint Windows	4 units	5,000.00
	Upgrade Kitchens	4 units	10,000.00	Upgrade Kitchens	4 units	10,000.00
	Appliance Purchases	15 units	10,000.00	Appliance Purchases	15 units	10,372.00
	Repair/Replace Roofs	2 bldgs	5,000.00	Repair/Replace Roofs	2 bldgs	5,000.00
	Security Cameras	2 cameras	5,000.00	Security Cameras	2 cameras	5,000.00
	Bond Repayment	N/A	51,381.00	Bond Repayment	N/A	51,462.00
	Total		158,184.59	Total		158,637.59
	Subtotal of Estimated Cost		158,184.59	Subtotal of Estimated Cost		158,637.59

Part II: Supporting Pages – Physical Needs Work Statement(s)						
Work Statement for Year 1 FFY 2016	Work Statement for Year 2019 FFY 2019			Work Statement for Year 2020 FFY 2020		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	Admiral Terrace			Admiral Terrace		
Annual Statement	Operations	N/A	51,803.59	Operations	N/A	51,803.59
	Repair/Replace Roofs	1 bldg	10,000.00	Repair/Replace Roofs	1 bldg	10,000.00
	Repair Gutters/add Guards	5 bldg	5,000.00	Repair Gutters/add Guards	5 bldg	10,000.00
	Upgrade Kitchens	4 units	10,000.00	Upgrade Kitchens	4 units	10,000.00
	Re-Caulk/Repaint Windows	7 bldgs	5,000.00	Re-Caulk/Repaint Windows	7 bldgs	7,500.00
	Mold Remediation	2 units	2,500.00	Mold Remediation	2 units	2,500.00
	Mold Testing	10 units	2,500.00	Mold Testing	10 units	2,500.00
	Appliance Purchase	11units	5,000.00	Appliance Purchase	11units	5,000.00
	Repoint/Seal Exterior	1 bldg	5,000.00	Repoint/Seal Exterior	1 bldg	5,000.00
	Security Cameras	2 cameras	5,000.00	Security Cameras	2 cameras	5,000.00
	Bond Repayment	N/A	51,381.00	Bond Repayment	N/A	51,462.00
	Total		153,184.59	Total		160,765.59
	Sunset Village			Sunset Village		
	Paint Exterior	1 bldg	30,000.00	Paint Exterior	1 bldg	20,000.00
	Security Cameras	2 cameras	5,000.00	Security Cameras	2 cameras	5,000.00
	Total		35,000.00	Total		25,000.00
	RI001000001 Total		346,369.18	RI001000001 Total		344,403.18
	Subtotal of Estimated Cost		188,184.59	Subtotal of Estimated Cost		185,765.59

Part II: Supporting Pages – Physical Needs Work Statement(s)						
Work Statement for Year 1 FFY 2016	Work Statement for Year 2019 FFY 2019			Work Statement for Year 2020 FFY 2020		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	Scattered Sites			Scattered Sites		
Annual	Operations	N/A	55,809.73	Operations	N/A	55,809.73
Statement	<i>Building Repairs (All Projects)</i>	5 bldgs	118,756.00	<i>Building Repairs (All Projects)</i>	5 bldgs	120,000.00
	Paint Buildings, Rebuild Porches			Paint Buildings, Rebuild Porches		
	Replace DHW Tanks, Boilers			Replace DHW Tanks, Boilers		
	Repair/Seal Foundation Cracks			Repair/Seal Foundation Cracks		
	Carb Monoxide/Smoke Detectors			Carb Monoxide/Smoke Detectors		
	Replace Windows, Deferred Painting			Replace Windows, Deferred Painting		
	Install Vinyl Siding, Vinyl Floor Tile			Install Vinyl Siding, Vinyl Floor Tile		
	Bond Repayment	N/A	55,354.00	Bond Repayment	N/A	55,441.00
	Total		229,919.73	Total		231,250.73
	RI001000002 Total		446,083.46	RI001000002 Total		532,854.13
	RI001000003 Hartford Park			RI001000003 Hartford Park		
	Operations	N/A	140,353.18	Operations	N/A	140,353.18
	A&E Fees and Costs Fire Alarm System	1 system	10,000.00	A&E Fees and Costs Fire Alarm System	1 system	10,000.00
	Utility Survey	1 unit	1,000.00	Utility Survey	1 unit	1,000.00
	LBP/Asbestos Testing	N/A	5,000.00	LBP/Asbestos Testing	N/A	5,000.00
	Upgrade Fire Alarm System	1 system	60,000.00	Upgrade Fire Alarm System	1 system	60,000.00
	Relocate Existing Generators to Outside	3 gens.	230,000.00	Relocate Existing Generators to Outside	3 gens.	230,000.00
	Subtotal of Estimated Cost		229,919.73	Subtotal of Estimated Cost		231,250.73

Part II: Supporting Pages – Physical Needs Work Statement(s)						
Work Statement for Year 1 FFY 2016	Work Statement for Year 2019 FFY 2019			Work Statement for Year 2020 FFY 2020		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	Hartford Park (continued)			Hartford Park (continued)		
Annual Statement	Exterior Building Repairs	15 bldgs	80,000.00	Exterior Building Repairs	15 bldgs	80,000.00
	LBP Abatement	2 units	5,000.00	LBP Abatement	2 units	5,000.00
	Handicapped Unit Renovation	2 units	87,853.04	Heat/Domestic HW System Repairs	1 unit	10,000.00
	Heat/Domestic HW System Repairs	1 unit	10,000.00	Security Cameras	2 cameras	5,000.00
	Security Cameras	2 cameras	5,000.00	Bond Repayment (FM/Res Svs Bldgs)	N/A	437,306.13
	Bond Repayment (FM/Res Svs Bldgs)	N/A	433,268.76	Bond Repayment (CFFP)	N/A	139,427.00
	Bond Repayment (CFFP)	N/A	139,208.00			
	RI001000003 Total		1,206,682.98	RI001000003 Total		1,123,086.31
	RI001000004 Manton Heights			RI001000004 Manton Heights		
	Operations	N/A	91,174.31	Operations	N/A	91,174.31
	Mold Remediation	3 units	5,000.00	Mold Remediation	3 units	5,000.00
	Mold Testing	10 units	2,500.00	Mold Testing	10 units	2,500.00
	Exterior Building Repairs	4 bldgs	20,000.00	Exterior Building Repairs	4 bldgs	20,000.00
	Upgrade Exterior lighting	1 bldg	10,000.00	Upgrade Exterior lighting	1 bldg	7,500.00
	Repair/Replace Gas/Water Lines	1 unit	10,000.00	Repair/Replace Gas/Water Lines	1 unit	10,000.00
	Exterior Repairs/Paint	1 bldg	10,000.00	Exterior Repairs/Paint	1 bldg	10,000.00
	Interior Repairs Mgmt Office	1 unit	5,000.00	Interior Repairs Mgmt Office	1 unit	5,000.00
	Subtotal of Estimated Cost		1,206,682.98	Subtotal of Estimated Cost		1,123,086.31

Part II: Supporting Pages – Physical Needs Work Statement(s)						
Work Statement for Year 1 FFY 2016	Work Statement for Year 2019 FFY 2019			Work Statement for Year 2020 FFY 2020		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	Manton Heights (continued)			Manton Heights (continued)		
Annual	Repair/Replace Roof on Brick Bldgs	1 bldg	50,000.00	Repair/Replace Roof on Brick Bldgs	1 bldg	50,000.00
Statement	Repair/Replace Doors and Hardware	25 units	10,000.00	Repair/Replace Doors and Hardware	25 units	10,000.00
	Security Cameras	2 cameras	5,000.00	Security Cameras	2 cameras	5,000.00
	Bond Repayment	N/A	90,431.00	Bond Repayment	N/A	90,573.00
	RI001000004 Total		309,105.31	RI001000004 Total		306,747.31
	RI001000005 Dexter Manor			RI001000005 Dexter Manor		
	Operations	N/A	80,399.17	Operations	N/A	80,399.17
	Upgrade Windows	5 units	5,000.00	Upgrade Windows	5 units	10,000.00
	Paint Stairwells	1 stair	5,000.00	Paint Stairwells	2 stairs	33,222.00
	Security Cameras	2 cameras	5,000.00	Security Cameras	2 cameras	5,000.00
	Bond Repayment	N/A	79,743.00	Bond Repayment	N/A	79,869.00
	RI001000005 Total		175,142.17	RI001000005 Total		208,490.17
	Subtotal of Estimated Cost		484,247.48	Subtotal of Estimated Cost		515,237.48

Part II: Supporting Pages – Physical Needs Work Statement(s)						
Work Statement for Year 1 FFY 2016	Work Statement for Year 2019 FFY 2019			Work Statement for Year 2020 FFY 2020		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	RI001000006 Dominica Manor			RI001000006 Dominica Manor		
Annual	Operations	N/A	56,362.30	Operations	N/A	56,362.30
Statement	Replace Shower/Tub Mixing Valve	15 units	5,000.00	Replace Shower/Tub Mixing Valve	15 units	5,000.00
	Appliance Upgrade	10	5,000.00	Appliance Upgrade	10	5,000.00
	Security Cameras	2 cameras	5,000.00	Security Cameras	2 cameras	5,000.00
	Bond Repayment	N/A	55,902.00	Bond Repayment	N/A	55,990.00
	RI001000006 Total		127,264.30	RI001000006 Total		127,352.30
	RI001000007 Carroll Tower			RI001000007 Carroll Tower		
	Operations	N/A	53,599.45	Operations	N/A	53,599.45
	Upgrade/Paint Hallway	1 unit	5,000.00	Upgrade/Paint Hallway	1 unit	5,000.00
	Appliance Upgrade	10	5,000.00	Appliance Upgrade	10	5,000.00
	Upgrade Kitchens	6 units	25,000.00	Upgrade Kitchens	6 units	25,000.00
	Replace DHW Riser	2 units	35,000.00	Replace DHW Riser	2 units	35,000.00
	Security Cameras	2 cameras	5,000.00	Security Cameras	2 cameras	5,000.00
	Bond Repayment CFFP	N/A	53,162.00	Bond Repayment CFFP	N/A	53,246.00
	RI001000007 Total		181,761.45	RI001000007 Total		181,845.45
	Subtotal of Estimated Cost		309,025.75	Subtotal of Estimated Cost		309,197.75

Part III: Supporting Pages – Management Needs Work Statement(s)					
Work Statement for Year 1 FFY 2016	Work Statement for Year 2017 FFY 2017			Work Statement for Year: 2018 FFY 2018	
	Development Number/Name General Description of Major Work Categories	Estimated Cost	Development Number/Name General Description of Major Work Categories	Estimated Cost	Estimated Cost
See Annual Statement	RI001000001 Chad Brown	0.00	RI001000001 Chad Brown	0.00	0.00
	Admiral Terrace	0.00	Admiral Terrace	0.00	0.00
	RI001000002 Coddington Court	0.00	RI001000002 Coddington Court	0.00	0.00
	Scattered Sites	0.00	Scattered Sites	0.00	0.00
	RI001000003 Hartford Park	0.00	RI001000003 Hartford Park	0.00	0.00
	RI001000004 Manton Heights	0.00	RI001000004 Manton Heights	0.00	0.00
	RI001000005 Dexter Manor	0.00	RI001000005 Dexter Manor	0.00	0.00
	Computer System Software	25,000.00	Computer System Software	25,000.00	25,000.00
	RI001000006 Dominica Manor	0.00	RI001000006 Dominica Manor	0.00	0.00
	RI001000007 Carroll Tower	0.00	RI001000007 Carroll Tower	0.00	0.00
	RI001000008 Kilmartin Plaza	0.00	RI001000008 Kilmartin Plaza	0.00	0.00
	RI001000009 Parenti Villa	0.00	RI001000009 Parenti Villa	0.00	0.00
	Subtotal of Estimated Cost	25,000.00	Subtotal of Estimated Cost	25,000.00	25,000.00

Part III: Supporting Pages – Management Needs Work Statement(s)					
Work Statement for Year 1 FFY 2016	Work Statement for Year 2019 FFY 2019			Work Statement for Year: 2020 FFY 2020	
	Development Number/Name General Description of Major Work Categories	Estimated Cost		Development Number/Name General Description of Major Work Categories	Estimated Cost
See	RI001000001 Chad Brown			RI001000001 Chad Brown	
Annual		0.00			0.00
Statement	Admiral Terrace			Admiral Terrace	
		0.00			0.00
	RI001000002 Coddington Court			RI001000002 Coddington Court	
		0.00			0.00
	Scattered Sites			Scattered Sites	
		0.00			0.00
	RI001000003 Hartford Park			RI001000003 Hartford Park	
		0.00			0.00
	RI001000004 Manton Heights			RI001000004 Manton Heights	
		0.00			0.00
	RI001000005 Dexter Manor			RI001000005 Dexter Manor	
	Computer System Software	25,000.00		Computer System Software	25,000.00
	RI001000006 Dominica Manor			RI001000006 Dominica Manor	
		0.00			0.00
	RI001000007 Carroll Tower			RI001000007 Carroll Tower	
		0.00			0.00
	RI001000008 Kilmartin Plaza			RI001000008 Kilmartin Plaza	
		0.00			0.00
	RI001000009 Parenti Villa			RI001000009 Parenti Villa	
		0.00			0.00
	Subtotal of Estimated Cost	25,000.00		Subtotal of Estimated Cost	25,000.00