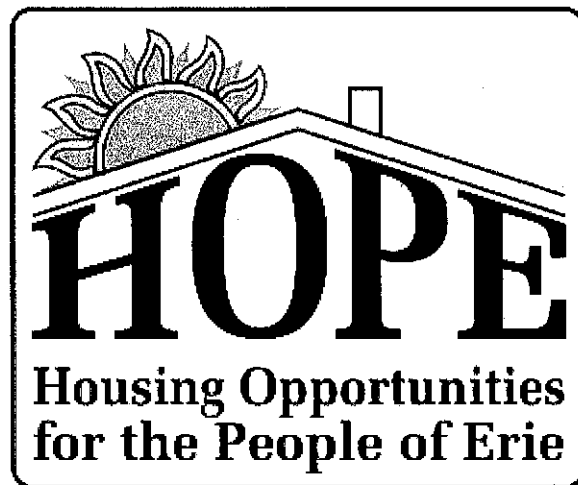


DRAFT

**HOUSING AUTHORITY
OF THE
CITY OF ERIE**



**AGENCY PLAN
2022**

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. The Form HUD-50075-5Y is to be completed once every 5 PHA fiscal years by all PHAs.

A.	PHA Information																																
A.1	<p>PHA Name: <u>Housing Authority of the City of Erie</u> PHA Code: <u>PA013</u></p> <p>PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>04/2022</u> The Five-Year Period of the Plan (i.e. 2019-2023): _____ PHA Plan Submission Type: <input checked="" type="checkbox"/> 5-Year Plan Submission <input type="checkbox"/> Revised 5-Year Plan Submission</p> <p>Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below 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. Additionally, the PHA must provide information on how the public may reasonably obtain additional information on the PHA policies contained in the standard Annual Plan, but excluded from their streamlined submissions. 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 websites. 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: 20%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 20%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 30%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 15%;">PH</th> <th style="width: 15%;">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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		PH	HCV																														
Lead PHA:																																	
B.	Plan Elements. Required for all PHAs completing this form.																																
B.1	<p>Mission. State the PHA's mission for serving the needs of low-income, very low-income, and extremely low-income families in the PHA's jurisdiction for the next five years. To provide safe, decent, and affordable housing for lower-income families, elderly and persons with disabilities; and to foster, among the residents we serve, economic self-sufficiency and a sense of community and pride in neighborhoods where they reside.</p>																																

B.2	<p>Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income, very low-income, and extremely low-income families for the next five years.</p> <ol style="list-style-type: none"> 1. Continue on-going Human Resources program that maintains process for board and staff recruitment and succession. 2. Improve livability of public housing. 3. Provide housing assistance to more families/individuals. 4. Operate all programs efficiently within budgetary limits; and improve staff productivity and effectiveness. 5. Enhance self-sufficiency of public housing/section 8 tenants and promote greater sense of community and pride among residents. 6. Improve Neighborhoods surrounding public housing communities.
B.3	<p>Progress Report. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. Report is attached.</p>
B.4	<p>Violence Against Women Act (VAWA) Goals. Provide a statement of the PHA's goals, activities, objectives, policies, or programs that will enable the PHA to serve the needs of child and adult victims of domestic violence, dating violence, sexual assault, or stalking. HACE understands that victims of VAWA crimes, people who have been victims of violence have certain rights under Federal Fair Housing regulation. To better assist our residents who are victims of domestic violence, dating violence, sexual assault and/or stalking; HACE provides funding to SafeNet for a Domestic Violence Counselor that provides on-site services to public housing residents.</p>
<p>C. Other Document and/or Certification Requirements.</p>	
C.1	<p>Significant Amendment or Modification. Provide a statement on the criteria used for determining a significant amendment or modification to the 5-Year Plan.</p> <p>Any significant amendment or substantial deviation/modification to the PHA Plan:</p> <ul style="list-style-type: none"> - Changes to rent or admission policies or organization of the waiting list. - Addition of non-emergency work items (items not included in the current Annual Statement of Five-Year Action plan) or changes in the use of replacement reserve funds under the Capital Fund. - Any change with regard to demolition or disposition, designation, homeownership programs or conversion activities.
C.2	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the 5-Year PHA Plan?</p> <p>Y N <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the 5-Year PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. See attached.</p>
C.3	<p>Certification by State or Local Officials.</p> <p><u>Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</u>, must be submitted by the PHA as an electronic attachment to the PHA Plan. See attached.</p>
C.4	<p>Required Submission for HUD FO Review.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>(b) If yes, include Challenged Elements.</p>

D. Affirmatively Furthering Fair Housing (AFFH)

D.1

Affirmatively Furthering Fair Housing. (Non-qualified PHAs are only required to complete this section on the Annual PHA Plan. All qualified PHAs must complete this section.)

Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Waiting on HUD Guidance

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

Waiting on HUD Guidance

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

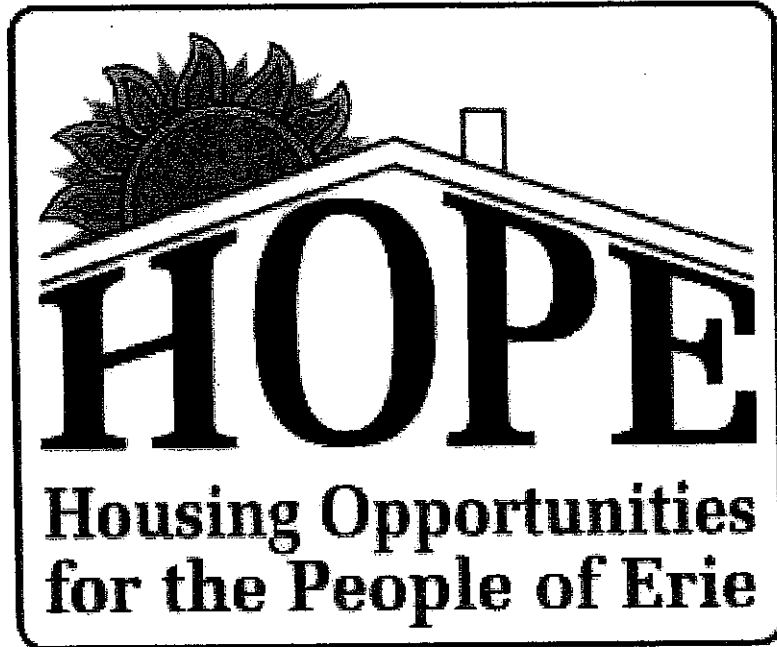
Waiting on HUD Guidance

2021 AGENCY PLAN ATTACHMENTS

- ATTACHMENT A - PROGRESS REPORT ON 5-YEAR PLAN GOALS**
- ATTACHMENT B - PHA PLAN UPDATE**
- ATTACHMENT C - HACE POLICY REVISIONS**
- ATTACHMENT D - PERFORMANCE REPORT CAPITAL FUND 2017**
- ATTACHMENT E - PERFORMANCE REPORT CAPITAL FUND 2018**
- ATTACHMENT F - PERFORMANCE REPORT CAPITAL FUND 2019**
- ATTACHMENT G - PERFORMANCE REPORT CAPITAL FUND 2020**
- ATTACHMENT H - PERFORMANCE REPORT CAPITAL FUND 2021**
- ATTACHMENT I - FY 2022 – 2026 CAPITAL FUND 5-YEAR ACTION PLAN**
- ATTACHMENT J – STATEMENT OF HOUSING NEEDS**
- ATTACHMENT K - STRATEGIES FOR ADDRESSING HOUSING NEEDS**
- ATTACHMENT L - HACE PROGRESS TOWARD FIVE-YEAR PLAN GOALS AND OBJECTIVES**
- ATTACHMENT M - DEFINITION OF SIGNIFICANT AMMENDMENT**
- ATTACHMENT N - RESIDENT ADVISORY BOARD MEETING MINUTES/COMMENTS**
- ATTACHMENT O - 2022 AGENCY PLAN ANNUAL STATEMENT**

ATTACHMENT A

**PROGRESS REPORT ON
5-YEAR PLAN GOALS**



The Housing Authority of the City of Erie

2021 Goals & Objectives

The Housing Authority of the City of Erie

2021 Goals & Objectives

Introduction

The Housing Authority of the City of Erie's steady progress in many areas in recent years is attributable in large part to knowing our mission and not deviating from it; keeping our clients' welfare uppermost in our thinking; knowing the major programs to pursue; and providing continuity and consistency upon which residents and staff can count. The following goals and objectives for the year 2021 identify a process that will advance our mission, vision and values by providing **six** major organizational goals and a series of measurable objectives against which our performance can be judged at the end of the year. Each of our goals and objectives will further the Housing Authority's 2020-2024 Strategic Plan.

The Authority has spent many years getting our house in order. We have renovated our entire housing inventory to modern-day standards, we provide a full range of support services for our residents, and our financial condition is excellent. In 2021 we renewed the terms of two of our board members. In 2019 HACE purchased the Better Housing properties and began the process of exploring changing from a public housing funding format to the Rental Assistance Demonstration (RAD) Program. In 2020, HACE like everyone else had to learn to operate in a COVID-19 world. Since 2017 HACE has seen the retirement of multiple key staff including the Executive Director, our controller, two long-time managers, two maintenance supervisors, the Administrative Assistant, and the Section 8 Coordinator.

In 2020 we created a new administrative position entitled the Associate Director of Compliance to assist in the transition to RAD and along with the Deputy Director coordinate the operational systems in all HACE offices to ensure that procedures are the same throughout HACE. 2020 also saw the transition from a unique software system to Horizon which is utilized by multiple Housing Authority's throughout Pennsylvania. In early 2021 HACE replaced its website with one that is up to date and more user friendly.

2021 will see a significant staffing change with the retirement of our long-time maintenance superintendent. HACE will complete a Physical Needs Assessment of all our public housing properties as part of the RAD process, make a final decision on Phase 1 of the RAD conversion, continue the transition to Horizon in the Section 8 program, continue our improvements at Better Housing by installing new windows and applying for additional grant funding, review and revise our personnel policies, and continue the yearly process of modernizing our properties. Lastly and most importantly HACE will continue to have a goal of maintaining an occupancy rate of above 97% at our properties.

Mission Statement

The Housing Authority of the City of Erie exists to provide safe, decent, and affordable housing for lower-income families, elderly, and persons with disabilities; and to foster among the residents we serve economic self-sufficiency, and a sense of community and pride in the neighborhoods where they reside.

Vision Statement

The Authority envisions public housing communities where all people have safe, affordable housing and opportunities for jobs providing a living wage that will lead to economic self-sufficiency, in diverse, sustainable neighborhoods.

Values Statement

We place our residents at the center of all our efforts. Their safety, satisfaction and success are our priorities.

GOAL #1. CONTINUE ON-GOING HUMAN RESOURCES PROGRAM THAT MAINTAINS PROCESS FOR BOARD AND STAFF RECRUITMENT AND SUCCESSION.

- Objective 1-* Continue updating all HACE policies and procedures for HACE Board review and approval.
- Objective 2-* Continue recruitment and succession plan for upper-level administrative staff.
- Objective 3-* Continue training programs for administrative, clerical and maintenance departments. Coordinate trainings through Deputy Director and Associate Director of Compliance.
- Objective 4-* Continue HR Department review and revision of HACE personnel policies.
- Objective 5 -* Continue process for evaluating administrative staff.

GOAL #2. IMPROVE LIVABILITY OF PUBLIC HOUSING

- Objective 1 -* Continue exploration of HACE conversion from HUD Public Housing Funding Format to Rental Assistance Demonstration – HUD Multi-Family Funding Format.
- Objective 2 -* Complete Physical Needs Assessment of all HACE public housing properties.
- Objective 3 -* Reduce reported crime by 2% from 2020.
- Objective 4 -* Reduce fires and risks of injury and property damage.

- Objective 5* - Develop preventative maintenance program.
- Objective 6* - Maintain response time for tenant-generated work orders to two (2) workdays or less.
- Objective 7* - Maintain "curb appeal" standards for all public housing communities including development of standards for areas outside living spaces.
- Objective 8* - Complete annual inspection and requisite follow-up on all public housing and Section 8-assisted units to assure all units are decent, safe, sanitary, and in good repair.
- Objective 9* - Develop annual update to Agency Plan; and maintain Capital Fund obligation rate.
- Objective 10* - Maintain current high level of resident satisfaction with living conditions in public housing.
- Objective 11* - Complete Lead-abatement grant work at Harbor Homes.
- Objective 12* - Recommend capital expenditures from reserve budget for Board approval.

GOAL #3. PROVIDE HOUSING ASSISTANCE TO MORE FAMILIES / INDIVIDUALS

- Objective 1* - Achieve 98% occupancy in our housing inventory.
- Objective 2* - Maintain Section 8 utilization rate at 1,000 units.
- Objective 3* - Decrease vacancy turnover time.
- Objective 4* - Provide supportive services to non-profits serving HACE special needs populations.
- Objective 5* - Continue to improve Housing Authority Web Site interactivity.
- Objective 6* - Expand HACE resident's access to affordable internet connectivity.
- Objective 6* - Maintain Veteran's Affairs Supportive Housing (VASH) program utilization at 98%.
- Objective 7* - Improve day to day operations in management office by insuring that all offices follow HACE established policies and procedures.

GOAL #4. OPERATE ALL PROGRAMS EFFICIENTLY WITHIN BUDGETARY LIMITS; AND IMPROVE STAFF PRODUCTIVITY AND EFFECTIVENESS

- Objective 1* - Collect 99% of annual charges for the year ending December 31, 2021.

- Objective 2* - Reduce utility consumption and expense.
- Objective 3* - Continue energy conservation improvements throughout public housing.
- Objective 4* - Limit operating expenses to rental income collected and HUD subsidies.
- Objective 5* - Maintain fiscal and management operations so there are no audit findings.
- Objective 6* - Reduce employee absenteeism.
- Objective 7* - Achieve high performance status on Section 8 Housing Assessment System (SEMAP).
- Objective 8* - Improve score on Public Housing Assessment System (PHAS).
- Objective 9* - Continue quality control for all HUD programs; improve staff proficiency in use of verification tools; and continue Tenant Fraud Detection Policy in all programs.
- Objective 10* - Continue implementation of HACE Strategic Plan for 2020-2024.

GOAL #5. ENHANCE SELF-SUFFICIENCY OF PUBLIC HOUSING / SECTION 8 TENANTS AND PROMOTE GREATER SENSE OF COMMUNITY AND PRIDE AMONG RESIDENTS

- Objective 1* - Provide housing to a cross-section of the low-income population in order to obtain a broad range of incomes in housing, and promote economic diversity resulting from employment.
- Objective 2* - Maintain the ratio of public housing/Section 8 tenants who have employment as a source of income.
- Objective 3* - Maintain HomePLUS Program at Schmid Towers and Friendship Apartments.
- Objective 4* - Continue Community Policing focus of C.O.P.P.S Program.
- Objective 5* - Work with residents to improve the image of public housing.
- Objective 6* - Maintain maximum participation in the Section 8 Self-Sufficiency and Public Housing Family Self-sufficiency Programs.
- Objective 7* - Encourage homeownership for Section 8 and Public Housing residents.
- Objective 8* - Continue flat rents that reflect market value of units based on size, condition, and location.

Objective 9 - Continue public relation focus that highlights self-sufficiency and educational achievements of HACE public housing and section 8 participants.

Objective 10 - Recruit residents to participate on Resident Advisory Board.

GOAL #6 IMPROVE NEIGHBORHOODS SURROUNDING PUBLIC HOUSING COMMUNITIES

Objective 1 - Continue to utilize HACE funds and grants to improve Better Housing properties.

Objective 2 - Identify public and private partners to participate in neighborhood community development initiatives.

Objective 2 - Continue acquisition of properties near public housing that are available and/or in distress.

Objective 3 - Develop strategy for the utilization of vacant land at Erie Heights and adjacent to Harbor Homes that would generate non-federal funds for other HACE initiatives.

Objective 4 - Develop relationships with community leaders and businesses in neighborhoods surrounding public housing that could provide employment opportunities for public housing residents.

goal&obj.2017

ATTACHMENT B

PHA PLAN UPDATE

ATTACHMENT B

PHA Plan Update

There has been one revision of the 2021 PHA Plan since the last Agency Plan submission in January 2021.

1. This amendment reflects an increase in CFP grant funds for the 2020 Agency Plan Year from \$4,969,235 to \$5,233,994.

The general public may obtain copies of the 5-Year and Annual PHA Plan at the administrative office of the Authority located at 606 Holland Street, Erie, Pa. 16501.

The 2022 Annual Plan will be posted on the Authority's website at www.hace.org after electronic submission to the HUD Pittsburgh Field Office on January 14, 2022.

ATTACHMENT C

HACE POLICY REVISIONS

**Housing Choice Voucher Administrative
Plan**

Public Housing Transfer Policy

Request for Documents Policy

EIV Policy and Procedure Manual

COVID – 19 HUD Waivers

HOUSING AUTHORITY OF THE CITY OF ERIE

2022 Agency Plan Policy Updates

Housing Choice Voucher Administrative Plan:

1. Updated the Equal Opportunity Requirements to include sexual orientation, gender identity or marital status.
2. Updated criminal history background check policy to reduce the number of years since a family has committed a major felony from 20 to 10 years.
3. Added sections on the Foster Youth to Independence Initiative and VASH Vouchers.
4. Includes self-certification as an acceptable form of verification.
5. Increased threshold for assets required to be verified from \$1,000 to \$5,000.
6. Includes the option of the voucher briefing video as opposed to in person.
7. Includes the option to conduct biennial as opposed to annual inspections.
8. Includes clarification of acceptable methods of inspections.
 - a. Owner/Participant provided photo of a repair.
 - b. Video inspection conducted between HACE HQS Inspector, Owner and Participant.
9. Clarified 24-hour deficiencies (life threatening).
10. Permits triennial reexaminations for families with incomes with 100% fixed income.
11. Updated the Earned Income Disregard from expiration from 48 to 24 months.
12. Includes language on the Violence Against Women Act.
13. Added a section on the Foster Youth to Independence Initiative. (FYI).

Public Housing Transfer Policy:

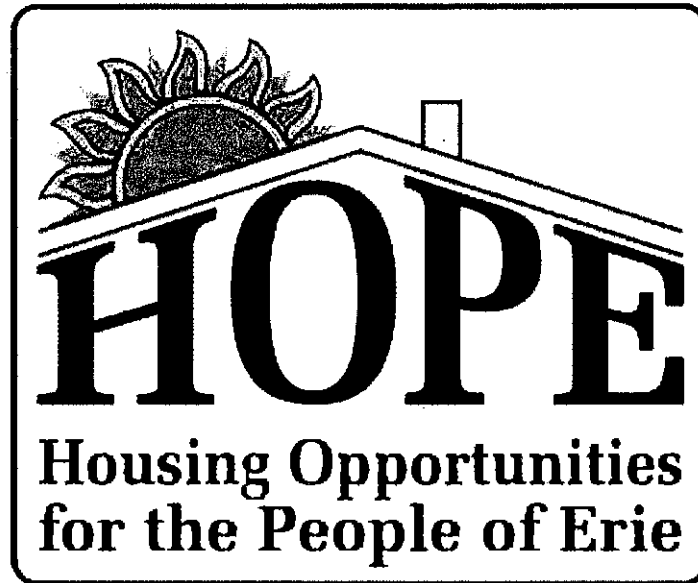
1. Prioritizes requests for transfers:
 - a. Priority 1: Imminent threat(s) as determined by HACE
 - b. Priority 2: To permit modernization of the unit and/or building
 - c. Priority 3: There is a verified medical need for a different unit
 - d. Priority 4: To correct any occupancy standards
 - e. Priority 5: To avoid concentrations of the most economically and socially deprived families
2. Outlines the appropriate reasons for a transfer request.
3. Outlines form for requesting a transfer.
4. Provides the circumstances under which a household is eligible for a transfer.
5. Outlines the offering of units and the right to refusal.

Request for Documents Policy:

Establishes a process of document/information requests to tenants and staffs' response when a resident does not provide the requested documentation.

EIV Policy and Procedure Manual:

The Enterprise Income Verification System (EIV) provides housing authorities with income information for residents who participate in the public housing and various section 8 and multi-family programs. This policy provides instruction and information on the acceptable use, disposition, and storage of data obtained through the EIV System.



HOUSING AUTHORITY OF
THE CITY OF ERIE

**Housing Choice Voucher Program
(Section 8)
Administrative Plan**

June 28, 2021

HOUSING AUTHORITY OF THE CITY OF ERIE
ERIE COUNTY, PENNSYLVANIA

HOUSING CHOICE VOUCHER PROGRAM
ADMINISTRATIVE PLAN

Revised	June 18, 2021
Board Approved	June 28, 2021
HUD Submittal	January 14, 2022

Chapter	Page
1. PROGRAM APPROACH AND OBJECTIVES	1-1
A. PURPOSE OF THE ADMINISTRATIVE PLAN	1-1
B. OVERALL PROGRAM OBJECTIVES	1-1
C. STAFFING AND ADMINISTRATIVE RESPONSIBILITY	1-2
D. OUTREACH INITIATIVES	1-2
E. ELIGIBLE TYPES OF HOUSING	1-3
F. REGULATIONS GOVERNING THE PROGRAM	1-3
G. EQUAL OPPORTUNITY REQUIREMENTS	1-4
H. PRIVACY STATEMENT	1-5
2. ELIGIBILITY AND ADMISSION	2-1
A. APPLICANT ELIGIBILITY	2-1
B. WAITING LIST	2-6
C. APPLICATION PROCESS	2-8
D. INCOME TARGETING	2-10
E. PREFERENCES	2-11
F. PREFERENCE DENIAL	2-11
G. SPECIAL ADMISSION (NON-WAITING LIST SELECTION)	2-12
H. FOSTER YOUTH TO INDEPENDENCE INITIATIVE (FYI)	2-12
I. VASH	2-13
3. VERIFICATION, INCOME AND DETERMINATION OF TTP	3-1
A. VERIFICATION POLICY	3-1
B. INCOME, ASSETS, AND INCOME EXCLUSIONS	3-4
C. TOTAL TENANT PAYMENT AND MINIMUM RENT	3-5
4. BRIEFINGS AND VOUCHER ISSUANCE	4-1
A. BRIEFINGS	4-1
B. FAMILY OBLIGATIONS	4-2
C. SUBSIDY STANDARDS	4-4
D. VOUCHER TERM	4-6
E. VOUCHER PORTABILITY	4-6
5. APPROVAL OF AN INITIAL LEASE	5-1
A. REQUEST FOR APPROVAL TO LEASE A UNIT	5-1
B. APPROVAL PROCESS	5-1
C. ADDITIONAL DOCUMENTATION	5-1
D. DISAPPROVAL OF OWNER	5-2
E. FAIR MARKET RENT/ PAYMENT STANDARD LIMITATIONS	5-3
F. EXCEPTION PAYMENT STANDARDS	5-3
G. REASONABLE RENT DETERMINATIONS	5-3
H. SECURITY DEPOSIT REQUIREMENTS	5-4
I. SEPARATE AGREEMENTS ACCEPTABLE TO HACE	5-4

6. HOUSING QUALITY STANDARDS INSPECTIONS	6-1
A. HOUSING QUALITY STANDARDS APPROACH	6-1
B. VARIATIONS TO HQS	6-1
C. ACCEPTABLE METHODS OF INSPECTIONS	6-1
D. INITIAL INSPECTIONS	6-2
E. BIENNIAL INSPECTIONS	6-2
F. SPECIAL INSPECTIONS	6-3
G. ENFORCEMENT OF INSPECTION	6-3
H. 24 HOUR DEFICIENCIES (LIFE THREATENING)	6-5
I. ABATEMENT OF PAYMENT	6-5
J. HAP CONTRACT TERMINATION	6-6
K. NOTIFICATION OF INSPECTION	6-6
7. PAYMENTS TO OWNERS	7-1
A. HOUSING ASSISTANCE PAYMENTS	7-1
B. ADJUSTMENTS OF RENT TO OWNER	7-1
8. REEXAMINATIONS	8-1
A. REPORTING REQUIREMENTS	8-1
B. REPORTING EXCEPTIONS	8-1
C. ZERO INCOME	8-2
D. ANNUAL REEXAMINATION	8-2
E. TRIENNIAL REEXAMINATION	8-3
F. INTERIM REEXAMINATION	8-3
G. DISALLOWANCE OF EARNED INCOME FOR PERSONS WITH DISABILITIES	8-4
H. REPORTING REQUIREMENT	8-5
I. INCORRECT REPORTING	8-5
9. SPECIAL FAMILY CIRCUMSTANCES	9-1
A. FAMILY BREAKUP	9-1
B. REMAINING MEMBER OF THE FAMILY	9-1
C. SINGLE MEMBER HOUSEHOLD	9-1
D. TEMPORARILY ABSENT CHILD	9-2
E. JOINT CUSTODY OF MINORS	9-2
F. LIVE-IN AIDE	9-2
G. DISAPPROVAL OF LIVE-IN AIDE	9-3
H. VAWA	9-3
10. EXCLUSIONS TO HOUSEHOLD	10-1
A. GENERAL POLICY	10-1
B. ABSENT FAMILY/ FAMILY MEMBER	10-1
C. TEMPORARILY ABSENT FAMILY MEMBER'S INCOME	10-1
D. OTHER ABSENT FAMILY MEMBERS	10-2
E. VISITORS	10-2
F. ABANDONMENT OF UNIT	10-2

11. TERMINATIONS AND FAMILY MOVES	11-1
A. LEASE TERMINATION	11-1
B. HAP CONTRACT TERMINATION	11-2
C. TERMINATION OF ASSISTANCE TO FAMILY	11-3
D. FAMILY MOVES	11-3
E. DEFINITION OF CONTINUOUSLY ASSISTED	11-4
12. INFORMAL REVIEWS AND HEARINGS	12-1
A. INFORMAL REVIEWS FOR APPLICANTS	12-1
B. INFORMATION HEARINGS FOR PARTICIPANTS.....	12-3
C. HEARING OFFICER AND CONDUCT OF INFORMAL REVIEWS/HEARINGS	12-5
D. INFORMAL REVIEW AND HEARING DECISIONS	12-6
E. RESTRICTION ON ASSISTANCE TO NON-CITIZENS	12-6
13. REPAYMENT AGREEMENTS	13-1
A. MISREPORTED OR UNREPORTED INCOME	13-1
B. OTHER AMOUNTS OWED HACE.....	13-1
C. REPAYMENT AGREEMENT POLICY.....	13-2
D. REPAYMENT AGREEMENTS BY OWNERS.....	13-2
E. PROSECUTION FOR FRAUD	13-3
14. PROGRAM INTEGRITY AND PERFORMANCE.....	14-1
A. PROGRAM MONITORING.....	14-1
B. ETHICS.....	14-1
C. QUALITY CONTROL.....	14-2
D. FINANCIAL REPORTING.....	14-2
E. EXPENDITURE THRESHOLD.....	14-2

1. PROGRAM APPROACH AND OBJECTIVES

A. PURPOSE OF THE ADMINISTRATIVE PLAN

This Housing Choice Voucher Program Administrative Plan ("Plan") establishes the Housing Authority of the City of Erie's ("HACE") discretionary policies and procedures that will be used in the administration of the Housing Choice Voucher Program ("HCV Program") in accordance with U.S. Department of Housing and Urban Development ("HUD") requirements. The approach to program functions contained in this Plan is applicable to admission and continued occupancy in the Housing Choice Voucher Program. The Moderate Rehabilitation Program will be administered in accordance with the approved Moderate Rehabilitation Plan. The Section 8 New Construction Management Plan will govern the operation of the Section 8 New Construction developments, C. Ted Dombrowski and Better Housing. Other Policies and Plans that are used in the administration of HACE programs can be found at www.hace.org.

This Administrative Plan complies with the requirements of Title 24 of the Code of Federal Regulations ("CFR") part 982.54. The goals of the Housing Choice Voucher Program are consistent with the City of Erie's Comprehensive Plan. HACE operates within the limits of the City of Erie, Pennsylvania, except for assistance that is administered under HACE's portability procedures.

B. OVERALL PROGRAM OBJECTIVES

The overall objectives for the Housing Authority of the City of Erie HCV Program are intended to achieve the following:

- Provide decent, safe, and sanitary housing at affordable cost to very-low income families;
- Expand housing opportunities in the private rental market. Including areas of low poverty;
- Encourage participation by owners of residential units outside of areas of poverty or minority concentration;
- Encourage self-sufficiency of Program participants; and
- Assure compliance with the HUD regulations, Equal Housing Opportunity requirements, and HACE's policies.

C. STAFFING AND ADMINISTRATIVE RESPONSIBILITY

HACE's HCV Program Department is responsible for administering the Housing Choice Voucher Program. The HCV Program operations are specialized, and the staff is assigned to perform such duties as intake; outreach to owners and families; eligibility; leasing/contracting; inspections; and income verification, including reexamination and computation of tenant rent.

The Program Coordinator, Assistant Program Coordinator and Housing Specialists handle all phases of the HCV program, including initial examinations and lease-up, annual reexaminations, interim reexaminations. Temporary staff may be assigned as needed to support departmental functions.

The Inspector is responsible for all the Housing Quality Standards (HQS) inspections for the HCV Program with the exception of quality control.

The HCV Program Coordinator reports to the Executive Director. In addition, the Executive Director, the Controller and one Accountant allocate a portion of their time to HCV Program functions.

HACE HCV Program offices are open during normal working hours of 8:30 am to 4:30 pm, Monday through Friday (except holidays). The main telephone number of HACE's HCV Program is (814) 456-2028.

D. OUTREACH INITIATIVES

Family Participation

HACE will make available information about the benefits of participating in the HCV program. Additional marketing targeted to very-low-income families will occur when the pool of available applicants on the waiting list decreases to a level that may affect the admissions of new participants or cause the Program leasing rates to decrease. Marketing may include the publication of information in local newspaper of general circulation, public announcements, radio advertisements, and/or specific marketing through "minority media".

Owner Participation

HACE will continue to encourage the participation of qualified owners of eligible affordable housing in all areas of its jurisdiction, provide assistance to HCV families to increase housing choice, and to take reasonable action to broaden area-wide housing choice. Marketing and outreach to owners are initiated by HACE through the following functions:

1. The HCV Program maintains up-to-date listings of available units and interested owners. Owners may request to be placed on the listing sheet. Owners of rental property who contact the HCV Program Office will be encouraged to list additional properties.

2. The HCV Program staff continuously markets the Program through contacts with existing owners of HCV Program properties, general discussions designed to interest new owner participation and owner outreach symposiums.
3. Information about owner opportunities in HACE's HCV Program is obtainable by contacting the HCV Program management office. Owner's guidebooks are available to provide general Program information and to highlight the benefits of program participation as an owner.
4. General marketing by HACE may include the publication of advertisements in a local newspaper of general circulation, public announcements, radio advertisements and/or specific marketing through "minority media".

E. ELIGIBLE TYPES OF HOUSING

The HCV Program provides participants with the opportunity to choose affordable private-market housing that meets their needs. The following types of housing may be selected by participants of the Housing Choice Voucher Program (unless otherwise designated) and are considered approvable by HACE.

- Single-family residences, duplexes, low-rise and garden apartments, townhouses, and high-rises.

HACE also approves the following special housing type in the HCV Program:

- Single Room Occupancy (SRO) units as defined in 24 CFR 982 sub-part M.

In general, HACE is not required to permit use of special types of housing in its program. However, HACE will permit use of any special housing type if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities in accordance with 24 CFR Part 8.

F. REGULATIONS GOVERNING THE PROGRAM

The HCV Program is governed by HUD Handbook 7420.7, where applicable, federal regulation (24 CFR parts 5, 982 and 985), HUD Memos, PIH Notices, HUD guidelines and/or other applicable law. If any amendments to HUD's rules, regulations or guidelines conflict with this Plan, such rules, regulations, or guidelines will supersede.

G. EQUAL OPPORTUNITY REQUIREMENTS

HACE complies with all applicable federal, state, and local nondiscrimination and equal opportunity laws including the Fair Housing Act; Title VI of the Civil Rights Act of 1964; the Age Discrimination Act of 1975; Executive Order 11063; Section 504 of the Rehabilitation Act of 1973; and Title II of the Americans with Disabilities Act and HUD'S Equal Access Rule 24 CFR 5.106.

The Housing Choice Voucher program requires all compliance with all equal opportunity requirements imposed by contract or federal law, including the authorities cited at 24 CFR 5.105(a) and Title II of the Americans with Disabilities Act, 42 U.S.C. 12101, et seq.

HACE prohibits discrimination based on race, color, religion, gender, age, national origin, disability, or family status, and provides housing without regard to perceived sexual orientation, gender identity or marital status.

HACE'S administrative office is accessible to persons with physical disabilities. The main telephone number of HACE is (814) 452-2425. Hearing impaired individuals may contact HACE at (814) 455-1797 which is a TDD/TDY/Voice telephone number or Dial 711 for the PA Relay Service as indicated in this section.

Information on housing discrimination will be provided to each eligible applicant included in their voucher briefing packet. If a family claims that illegal discrimination has prevented them from finding or leasing a suitable unit under the Program, HACE will provide the family with information on how to complete and file a housing discrimination complaint.

Owners of property assisted under the HCV Program must comply with all federal, state, and local equal opportunity and fair housing laws, including the Fair Housing Act. An owner who violates these laws will be deemed to be ineligible for participation in the HCV Program and may be subject to prosecution.

Special Needs and Reasonable Accommodation

HACE will make every effort to reasonably accommodate persons with documented special needs as mandated by the Americans with Disabilities Act, 42 U.S.C. 12101 et seq. These efforts will be made for all persons with whom HACE conducts business including both applicants and tenants in accordance with 24 CFR Part 8. Section 504 of the Rehabilitation Act of 1973 as amended and HACE'S Reasonable Accommodation Policy.

Additional actions, which may be taken, include but are not limited to:

1. Additional telephone calls to accommodate the special needs
2. Scheduling additional appointments
3. Contacting a family member, case worker or other person who assists the family, with the applicant/participant'S prior permission
4. Providing alternate equally effective forms of communication

5. Home visits
6. Communications using email or text messaging
7. The use of a TTD/TTY telephone number
8. PA Relay Service Dial 711 or the below toll-free numbers:
 - TTY: 1-800-654-5984
 - Voice: 1-800-654-5988
 - Speech-to-Speech: 1-800-308-9292
 - Spanish: 1-844-308-9291

Documented Special Need – must be a signed statement, from a qualified professional who is familiar with the individual (applicant or resident) and their disability, indicating that the individual would benefit from the accommodation.

The Housing Authority of the City of Erie is committed to the Fair Housing Act, which among other things, prohibits discrimination against person with disabilities. In accordance with our statutory responsibilities and management policies, we will make reasonable accommodations in our rules, policies, practices, or services, when such accommodations may be necessary to afford persons with disabilities an equal opportunity to be able to use and enjoy their housing community.

HACE Reasonable Accommodation Policy states the process to request a reasonable accommodation can be found at www.hace.org.

If at any time a family is uncooperative with HACE's efforts with respect to reasonable accommodation, HACE will take action in accordance with the regular operating policies and procedures of HACE, including those contained within this Plan.

H. PRIVACY STATEMENT

It is the policy of HACE to facilitate the privacy of individuals conferred under the Privacy Act of 1974, and to ensure the protection of such individual's records maintained by HACE.

Therefore, unless it is required or permitted by law, HACE shall not disclose any personal information contained in its records to any person or agency unless the individual about whom information is requested gives HACE written consent to such disclosure.

This privacy policy in no way limits HACE's ability to collect such information as it may need to determine eligibility, compute rent or determine an applicant's suitability for tenancy.

2. ELIGIBILITY AND ADMISSION

A. APPLICANT ELIGIBILITY

Eligible families are admitted to the HCV Program based upon family composition, income limits, citizenship and other criteria as defined by HACE and HUD.

1. Eligibility Criteria

To be eligible for admission for participation, an applicant must meet the criteria for eligibility determination as established by HUD, as well as any additional criteria established by the Housing Authority of the City of Erie.

HUD has established the following basic factors for eligibility:

- Family Composition
- Income Limits
- Citizenship and eligible non-citizen status
- Admission criteria relevant to prior history in any HUD-assisted programs and criminal history checks.

2. Factors for Determining Eligibility

The family's eligibility for placement on the waiting list will be based on the following factors and will not be verified until selection from the applicant pool for housing assistance is made. A family is defined as a person or group of persons:

- a. Regularly living together, related by blood, marriage, adoption, guardianship, evidencing a stable relationship, operation of law; or an elderly family, single person, single pregnant woman with no other children, or a displaced person, as defined by HUD;
- b. Whose annual income, at the time of admission, does not exceed the income limits for occupancy as established by HUD and posted separately in HACE's offices;
- c. Who meet or exceed the screening criteria; and
- d. Other individuals, including foster children, live-in aides, and members temporarily absent, may be considered to be a part of the family group if they are living or will live regularly with the family. (Refer to Chapter 9 of this plan.)

3. Income Limits

Applicants must qualify for admission to the HCV Program based upon total annual income for all members of the household family. Eligibility is determined using the following income categories:

a. *Extremely-low-income families (Income Targeting Eligible)*

Families whose incomes, at the time of admission, do not exceed 30% of the area median income. Seventy-five (75%) of all new admissions to the HCV Program will be in this category.

b. *Very-low-income families*

Families whose income, at the time of admission, do not exceed the very-low-income limits established by HUD, but are greater than the extremely-low-income limit.

c. *Low-income families*

Families whose incomes, at the time of admission, do not exceed the low-income limit established by HUD and must meet reasons identified in 24 CFR 982.201 (b), (ii), (iii), (iv), (v) & (vi).

4. Citizenship

An applicant must be eligible as a Citizen of the United States or a Non-Citizen who has eligible immigration status as determined in accordance with 24 CFR part 5 Subpart E. Citizens of the Republic of Marshall Islands, the Federated States of Micronesia and the Republic of Palau who are eligible for assistance, are entitled to receive a preference for housing assistance, except that within Guam, such persons are not entitled to housing assistance in preference to any United States Citizen or national resident.

A Declaration of Citizenship Status form must be signed for all family members, including children. Verification of eligible citizenship status will be conducted upon receipt of the final application.

5. Other Criteria

All applicants and participants of the HCV Program must meet other specific eligibility criteria. HACE will perform criminal history background checks in PA and nationally to include where household members are known to have resided, in accordance with 24 CFR 5.856. Police reports may also be used for verification

The Housing Authority of the City of Erie may deny program assistance to an applicant (or may terminate participation for a participant) if any one of the following occurs:

- a. Any member of the family has been evicted from any public housing, Indian housing, Section 23, or any HCV Program because of drug-related criminal activity as defined in 24 CFR 982.4, or if any member of the family has been evicted from public housing for any other reason in the past 7 years. The 7 year period shall begin on the date of such eviction. HACE will obtain verification from the Public Housing Authority ("PHA") or the owner of federally assisted housing if applicable.
- b. Any PHA has terminated program assistance for violation of family obligations or program regulations under the Voucher program by any family member in the past 7 years. HACE will obtain verification from the PHA if applicable.
- c. Any member of the family has committed drug-related criminal activity or violent criminal activity within the past 7 years as defined in 24 CFR 982.4.
- d. Any family member, in the past 7 years, has demonstrated a pattern of the abuse of alcohol or a pattern of illegal use of a controlled substance that may interfere with the health, safety or right to peaceful enjoyment of persons residing in the immediate vicinity of the residence (neighbors). If HACE has reason to believe that a detrimental pattern exists, additional inquiry may be initiated through such resources as police and medical records (if available) to determine if there is a threat to the health, safety or right to peaceful enjoyment of neighbors.
- e. Any family member has ever been convicted of manufacturing or producing methamphetamine on the premises of a federally assisted housing development or unit in violation of any federal or state law. These individuals will be permanently denied admission to HACE's HCV Program.
- f. Any member of the family commits serious violent crimes as follows:
 - Any member has ever been convicted of a major felony such as: murder, rape, or terrorism, but not necessarily limited to these items, shall be denied housing for a period of 10 years from date of such conviction;
 - Has ever been convicted of any form of sexual crime, or crimes against minor children, or have a history of arrests for any form(s) of sexual crime or crimes against minor children shall be denied housing for a period of 10 years from date of such conviction; or
 - Any member has ever been convicted as a sex offender and subject to a lifetime registration with federal, state, or local law enforcement agencies. These individuals will be permanently denied admission by HACE.
- g. There is a history of criminal activity on the part of any applicant family member involving crimes of physical violence to persons or property and other criminal acts which would affect the health, safety and welfare of other residents, including but not limited to arrest or conviction for drug-related offenses.

- h. Any member of the family has ever engaged in or threatened abusive or violent behavior toward HACE personnel.
- i. There is a record of disturbance of neighbors, destruction of property, living or housekeeping habits at prior residences which may adversely affect the health, safety and welfare of other residents or neighbors.
- j. Any family member has committed any fraud, bribery or other corrupt or criminal act in connection with any federal housing program.
- k. The family currently owes rent or other amounts to HACE or for any previous tenancy in HUD-assisted housing programs.
- l. The family has breached an agreement with HACE to pay amounts owed to HACE, or amounts paid to an owner by HACE.
- m. The family has not reimbursed a PHA or other federally subsidized programs for amounts paid to an owner under a HAP contract for rent, damages to the unit (contracts effective prior to 10-2-1995) or other amounts owed by the family under the lease.
- n. Any member of the family fails to sign and submit the required consent forms for obtaining information, including form HUD 9886.
- o. Other reasons are required by HUD regulations or other applicable law.

6. Protections under the Violence Against Women Act

The Violence Against Women and Justice Department Reauthorization Act of 2017 (VAWA) is a gender neutral protection for the victims of domestic abuse. Accordingly, victims of domestic abuse will not be discriminated against during the application process with regard to eligibility, or have penalties regarding continued participation/tenancy if a household member is the victim of domestic violence, dating violence, sexual assault and stalking.

HACE may not consider incidents of domestic violence, dating violence, sexual assault and stalking as serious or repeated violations of the lease or "good cause" for termination of assistance, tenancy, or occupancy rights of the victim of abuse.

HACE may not consider criminal activity directly relating to abuse, engaged in by a member of the tenant's household or any guest or other person under the tenant's control, cause for termination of assistance, tenancy, or occupancy rights if the tenant or an immediate member of the tenant's family is the victim or threatened victim of that abuse.

HACE may request, in writing, that the victim, or a family member on the victim's behalf, certify that the individual is a victim of abuse and that the form HUD-5382 Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation or other documentation as noted on the certified form, be completed, and submitted with 14 days, or an agreed upon extension date, to receive protection under VAWA. Failure to provide the certification or other supporting documentation with the specified timeframe may result in eviction or the termination of rental assistance.

All HACE tenant's/participants will sign a Lease Addendum (Form HUD-91067) informing them of their rights under VAWA.

7. Evidence of Criminal Activity

HACE will deny assistance to a family based upon drug-related criminal activity, violent criminal activity, or alcohol abuse if the preponderance of evidence indicates that a family member has engaged in such activity, regardless of whether the family member has been arrested or convicted.

HACE will use the preponderance of evidence definition in Black's Law Dictionary, which is:

"Evidence which is 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."

8. Eligibility Exceptions

- a. HACE may not deny admission to the HCV Program for a family member's drug-related criminal activity if the family member can demonstrate the following:
 - 1) has an addiction to a controlled substance, has a record of such impairment, or is a regarded as having such an impairment; and
 - 2) has recovered from such addiction, does not currently use or possess controlled substances, and;
 - Has successfully completed a supervised drug or alcohol rehabilitation program;
 - Has otherwise been rehabilitated successfully; or
 - Is participating in a supervised drug or alcohol rehabilitation program.

- b. HACE will not deny the admission to the HCV program for a family member's drug-related criminal activity, violent criminal activity, or alcohol abuse if the family member involved in such activity or abuse is no longer a member of the household.
- c. However, HACE shall permanently deny admission to any individuals convicted of manufacturing or producing methamphetamine on the premises of a federally assisted housing development or unit in violation of any federal or state law.

B. WAITING LIST

1. Waiting List Maintenance

The HCV Program of HACE maintains a separate waiting list from its Public Housing Program. HACE utilizes a random lottery system to position applicants on the final HCV waiting list. The Authority will determine a reasonable period for the opening and closing of applications. HACE will not accept applications prior to the opening and after the closing of the enrollment period. Applicants are selected from the waiting list in numerical order from lowest to highest. Only after a final application is completed will a determination be made on an applicant's eligibility.

Applicants must inform HACE of any changes to information listed on the application (e.g., address, phone number, email). Failure to notify HACE of such changes may result in the applicant's removal from the waiting list.

At minimum, the waiting list will contain the following applicant information:

- a. Applicant name, address, and Social Security Number
- b. Family members
- c. Date of application
- d. Racial and ethnic designation of head of household
- e. Lead-Safe Housing Preference for local families with children

2. Cross Listing

If HACE's waiting list for the Public Housing Program is open when an applicant is placed on the waiting list for its HCV Program, the applicant can request to complete a Public Housing preliminary application.

3. Opening/Closing of the Waiting List

If HACE is taking application on an open-enrollment basis and decides to close the waiting list, HACE will do so in accordance with HUD regulations.

If the waiting list is closed and HACE decides to open the waiting list, HACE shall publicly announce the opening in the manner provided in 24 CFR 982.206. During the period when the waiting list is closed, HACE will not maintain a list of individuals who wish to be notified when the waiting list is reopened.

4. Removing Names from the Waiting List

HACE will remove the name of an applicant from the HCV waiting list when there is no response to a request for additional or updated information. Such a request will be made by HACE in writing and addressed to the applicant at their current or updated address listed on the application. The request will include a deadline date and notice of removal from the waiting list for non-compliance. If there is no response within 14 days, HACE will notify the applicant, by mail, that their request for housing assistance is denied. The notice will also inform the applicant of their opportunity for an Informal Review.

If an applicant's failure to respond to a request for information or update was caused by their verified disability, HACE will provide reasonable accommodation to give them an opportunity to respond.

An applicant may remove their name from the waiting list by requesting that their application be cancelled. Such request must be made in writing to HACE. Subsequent to cancellation, an applicant may reapply when the waitlist enrollment period is open again, but will not be given consideration for their position on the waiting list under their previous application.

5. Funding Limitations

If HACE does not have sufficient funds to subsidize the family unit size of the family at the top of the waiting list, HACE will **not** skip the top waiting list family in order to admit an applicant family with a smaller family unit size that can be immediately supported with available funding.

C. APPLICATION PROCESS

1. Application Policy

The policy of HACE is to treat all applicants in a fair and consistent manner. All families who are interested in applying for HACE's Housing Choice Voucher Program must complete a preliminary application when enrollment is open. HACE maintains a single waiting list for the HCV Program.

Any family who has failed to pay an outstanding balance consisting of uncollected rent and/or miscellaneous charges owed to HACE or any other federally funded housing program will be permitted to complete an application. However, an initial determination of ineligibility will be made based upon such debts owed.

2. Preliminary Application

To participate in the HCV Program, families must make a preliminary application to HACE using the forms prescribed by HACE and HUD. A prospective applicant can obtain an application from HACE HCV Program office or apply on the website during the open enrollment period. Instructions are provided with the announcement. Applicants will be notified by mail of their position on the waiting list.

3. Final Application

When an applicant has reached the top of the waitlist and is selected to process their application, a final application packet will be mailed to complete and provide necessary documentation on date instructed. Communication may be conducted by phone, mail, in person or other means acceptable to HACE.

The final application packet must be completed and signed by the head-of-household, spouse, and all other adult members. Applicants who submit applications or related documents that are incomplete and/or unsigned will be considered to be ineligible for placement on the waiting list.

If the packet is returned to HACE (e.g., unknown address, vacant, etc.) or there is no response by due date, the application will be purged from the waitlist.

If the applicant is removed from the waiting list because of their failure to respond was due to a verified disability, HACE will reinstate the applicant to their former position on the waiting list.

All adult members must sign the Release of Information Forms for the application to be considered complete.

Applicants will be required to provide the following information during the processing of the final application:

- Annual income;
- Asset information;
- Family Composition and proof of age of all family members; (e.g.: Birth Certificates)
- Medical Expenses (disabled and/or elderly);
- Social Security Cards for all members;
- Verification of citizenship and/or eligible non-citizen status;
- Verification of disability status;
- Photo Id for adults 18 years and over; and
- Other information HACE may require to determine eligibility.

HACE will make special accommodations to assist an applicant with a disability to complete an application. An application in accessible format may be made available at the request of the person with a disability.

4. Notification of Eligibility for Participation

Upon completion of the final application and the information contained therein, the applicant will be sent one of the following:

- a. If the applicant meets the eligibility criteria, a letter will be sent, which will indicate, based upon the application submitted, that they appear to qualify for participation in the HCV program. They will also receive an extended Voucher briefing packet.

Normally, upon notice of eligibility, an applicant will receive information regarding a voucher briefing. In the event that HACE is in a shortfall (a time when funding utilization exceeds funding received by HUD), applicants will receive notification of eligibility only.

Applicants who received a determination of eligibility during shortfall, will be issued vouchers in application number order when additional funding is available to HACE.

- b. Applicants who are determined to be ineligible or unsuitable for admission will be notified promptly by mail or other suitable means such as email of HACE's decision. These applicants will receive a Notice of Ineligibility from HACE stating the basis for such determination. HACE shall provide such applicants with an opportunity for an informal review of the determination. The applicant must contact HACE in writing within 14 days of receipt of the Letter of Ineligibility. Upon timely receipt of the applicant's request for review, HACE will schedule the informal review. The review shall occur within a reasonable time frame following the determination of ineligibility or unsuitability. The Letter of Ineligibility to the applicant will include the reason for the determination.

Applicants determined ineligible for violent criminal activity or drug related activity as a result of the informal review, will be considered ineligible to reapply for a period of 1 year. Applicants denied for other reasons may reapply based upon the decision issued at the review.

After the ineligibility period has expired, applicants may reapply for housing subject to the conditions described in these policies.

- c. In the event the family is ineligible due to non-citizen status, HACE will notify the family in writing of ineligibility. The letter will inform them of their right to a Department of Homeland Security (DHS) appeal and/or PHA Informal Review and other applicable requirements of 24 CFR 5.5.

In the event of a subsidy short fall, HACE will be unable to select applicants and process waitlist eligibility determinations until funding is available. Applicants who were in process before the short fall will receive eligibility determinations (refer to 4a).

D. INCOME TARGETING

All information on the application will be verified when HACE estimates that a Voucher can be issued within 60 days. A family will not be selected for admission until verification of all required information has been provided.

To assure compliance with §513 of the Quality Housing and Work Responsibilities Act of 1998, families will be selected from the waiting list based upon Income Targeting requirements in accordance with the following:

1. Selection will be made based upon HACE's obligation that at least seventy-five percent (75%) of all new admissions to the HCV Program do not have incomes that exceed 30% of the area median income;
2. HACE will monitor admissions every 6 months to determine compliance with the 75% Income Targeting requirement; and
3. HACE will admit families to the HCV Program to comply with the Income targeting requirement and may adjust the waiting list selection to do so.

At any time HACE may, at its sole discretion and without notice, adjust the selection of Income Targeting Eligible families to an amount between 75% and 100%, if it has determined, that an insufficient number of household incomes do not exceed the 30% area median income.

Where necessary, a request will be made to HUD by HACE to establish and implement different targeting standards, for "good cause", in accordance with HACE's Agency plan. "Good cause" may include, but is not limited to, the requirement to house eligible families as special non-waiting list admissions and the treatment of the family's income for the purposes of eligibility and Federal Income Targeting.

E. PREFERENCES

Families who qualify for a Preference, as defined in this section, will be admitted prior to families who do not have a Preference. All Preferences will be rated as equal, having no individual weight or aggregate value for multiple preferences. HACE will place families on the waiting list by application number, and by the Preferences as described below:

a. Special Lead-Safe Housing Preference for Local Families with Children

Any applicant family who currently resides in a unit which has been selected for the HUD-funded Lead Hazard Control Program operated by the Redevelopment Authority of the City of Erie and who:

- Has, as one of its members, a child under 6 years of age; and
- Resides in the City of Erie

b. Youth to Independence (FYI) Voucher Preference

An eligible FYI participant who has completed their 36 month voucher term may be eligible for a HCV preference on the waiting list.

F. PREFERENCE DENIAL

A preference does not guarantee admission. The applicant must meet all HACE tenant screening criteria before being selected as a tenant.

If the applicant's Special Lead-Safe Housing preference cannot be verified, the applicant will be placed back on the waiting list in their original position and notified of the preference denial and given the opportunity for an informal review.

If an FYI participant whose voucher has terminated and is denied a preference for a HCV, the participant will be notified of the preference denial, and given the opportunity for an informal hearing.

G. SPECIAL ADMISSIONS (NON-WAITING LIST SELECTION)

A special admission is the admission of an applicant who is not on HACE's waiting list or who is admitted without consideration of the applicant's waiting list position. HACE will admit families as special admissions under the following conditions:

1. If HUD awards funding that is targeted for families living in specified units:
 - HACE will use the assistance for the families living in these units; and
 - HACE will maintain records showing that a family was admitted with HUD-targeted assistance.
2. HACE will admit a family who is part of a HUD Office of Inspector General ("OIG") witness protection program, provided that the OIG furnishes a written threat assessment that recommends re-housing the family to avoid or minimize risk of violence against family members as a reprisal for providing information.

H. FOSTER YOUTH TO INDEPENDENCE INITIATIVE VOUCHERS (FYI)

FYI vouchers are reserved for youth ages 18 and not more than 24 years old, who have left foster care or will be leaving foster care within 120 days and are at risk of becoming homeless.

FYI vouchers will be requested from HUD on an as needed basis as referred applicants apply for housing. Referrals to HACE are only available for individuals who qualify through the Erie County Office of Children and Youth.

If a referred applicant is currently on the HCV waitlist, they will be selected in order of their position on the HCV waitlist in accordance with HACE admission policies. Their application cannot be removed, cancelled or withdrawn, in anticipation of a FYI voucher availability.

If HACE HCV waitlist is closed, it will reopen and close, to accept an FYI applicant youth, without opening the waitlist for other applicants.

FYI applicants are subject to the same screening procedures and eligibility requirements as an HCV applicant. If eligible, they will be offered a voucher once HACE receives approval from HUD. If ineligible, they can request an Informal Review (see chapter 12).

The family will have a maximum of three (3) years to use the voucher. At the end of 3 years, the voucher will be given to another FYI qualified applicant or turned back into HUD. If there is an HCV available at the time of the FYI voucher expiration HACE or another Housing Authority may absorb the tenant into their HCV program.

Portability requirements for a FYI voucher are the same as HACE's standard HCV with one exception. HACE has elected to waive the 1st year residency within the City of Erie so that FYI applicants may port to Erie County immediately when they receive their voucher. Other than porting to the County, a FYI voucher holder must reside within the City of Erie for 1 year before porting elsewhere.

I. VASH

HACE administers vouchers specifically for homeless Veterans and their families who are referred by the Veterans Affairs Medical Center (VAMC). The VAMC maintains the VASH waitlist and conducts their screening for eligibility, prior to a written referral for a voucher. HACE is required to verify a Lifetime Sex Offender registration and income limits for determination of eligibility. After admission, a participant who wishes to add another household member, will be subject to the HCV standard screening criteria.

VASH vouchers are portable to any Housing Authority that administers HCV's. As part of the VASH voucher requirement, the Veteran must agree to comply with required case management activities through the VAMC or the voucher may be terminated.

3. VERIFICATION, INCOME AND DETERMINATION OF TTP

A. VERIFICATION POLICY

1. Third-Party Verification

HACE will require that all applicants and participants sign HUD and HACE required Release and Consent forms for the purpose of obtaining independent verifications pertaining to eligibility and rent determinations. Third-party written verification will be requested by HACE to the extent that such verification is possible. In cases where appropriate third-party verification cannot be used, HACE will document the file as to why another method was used. HACE will attempt to obtain all verifications for the purpose of determining anticipated income and expenses for the subsequent 12 month period. Enterprise Income Verification (EIV) as accessed in accordance with HUD requirement shall be the first source of third-party verification to the extent that such information is available. HACE, at its discretion, may use other HUD-allowed variations applicable to this verification policy.

In accordance with 24 CFR §982.516(a)(2), HACE will make very reasonable attempt to obtain and document in the applicant/participant file third party verification of the following factors:

- Reported family annual income;
- The value of assets;
- Expenses related to deductions from annual income; and
- Other factors that affect the determination of adjusted income.

HACE will use the most effective third party verification techniques available and will apply them in the priority order listed below:

- a. **Upfront Income Verification (UIV) (Priority 1):** The verification of income before or during a family reexamination, through an independent source that systematically and uniformly maintains income information in computerized form for a number of individuals.

HUD's Enterprise Income Verification (EIV) system shall be the first choice of Upfront Income Verification to be used in its entirety to verify tenant income and employment information.

HACE may use other UIV resources including, but not limited to:

- Private sector databases (e.g., The Work Number)
- State government databases

- b. **Written Third Party Verification (Priority 2):** An original or authentic document generated by a third party source dated either within the sixty (60) day period preceding the reexamination or HACE request date. Such documentation may be in the possession of the tenant (or applicant), and is commonly referred to as tenant-provided documents. HACE may, at its discretion, reject any tenant-provided documents and follow up directly with the source to obtain necessary verification of information.

Examples of acceptable tenant-provided documentation (generated by a third party source) include, but are not limited to: pay stubs, government award letters, medical bills, income tax documents, checks, bank statements, payroll reports or other documents that would provide information as to applicable current or ongoing amounts received or disbursed by the family. HACE staff will review and determine the validity and/or accuracy of the document. Government checks will not be photocopied but will be documented by HACE. In all instances, current acceptable tenant-provided documents must be used for income and rent determinations.

HACE will obtain at a minimum, two current and consecutive pay stubs for determining annual income from wages. For new income sources or when two pay stubs are not available, HACE may project income based on the information from a traditional written third party verification form or the best available information.

Note: Documents older than 60 days are acceptable for confirming effective dates of income.

- c. **Written Third Party Verification Form (Priority 3):** Also known as traditional third party verification, it is a standardized form to collect information from a third party source. The form is completed by the third party by hand (in writing or typeset). HACE shall send the form directly to the third party source by mail, fax or email.

- **Mail documentation** of a request by HACE, mailed directly to an appropriate individual authorized to report applicable information of the family member, and returned directly to HACE.
- **Facsimile-transmitted documentation** directly issued to HACE which has been signed or certified by an appropriate individual authorized to complete such verification.
- **Email documentation** directly transmitted to HACE that contains an identifiable email address from which it originated, and indicates the appropriate individual and entity requested to verify the information; or an attached file that contains the requested information that clearly indicates authenticity.

This verification method will be used by HACE where UIV and Written Third Party Notification (Priority 2) information is not available, or to obtain additional information necessary to accurately verify information received in higher priority categories.

- d. **Oral Third Party Verification (Priority 4):** through contacts made by telephone or in person, to an appropriate third party. HACE staff member will document the facts obtained, the date and time of the contact, the specific party who provided the information, and other data on a form prescribed HACE.

This verification method is used in the event that either two attempts have been made to obtain any written third-party verification without success, or third party verification is not possible.

2. **Non-Third-Party Verification**

Where third party verification is not available or where HACE has made numerous attempts to obtain the required verifications with no success, or in instances where it may not be cost effective to obtain third party verification of income, assets, or expenses, when the impact on total tenant payment is minimal, HACE will document in the family file as to the reason(s) why third party verification was not available. The tenant will then be required to submit the following:

- o **Self-Certification:** by the applicable family member who provides a notarized statement or affidavit that indicates the item(s) to be verified. This form of verification will be used when all other methods are not possible.

3. **Citizenship Verification**

Participation in the HCV Program is restricted to citizens or eligible non-citizens of the United States. Citizens of the Republic of Marshall Islands, the Federated States of Micronesia, and the Republic of Palau who are eligible for assistance as non-citizens, are entitled to receive a preference for housing assistance, except that within Guam, such persons are not entitled to housing assistance in preference to any United States citizen or national resident.

If the Declaration of Citizenship/Eligible Non-Citizen Status indicates that verification must be done, HACE will request information from DHS. This information will be requested first through "SAVE" procedure, then secondary verification if "SAVE" does not verify eligible status. Note: This verification is only to be done prior to admission unless a new family member joins the family.

If it is determined that a family has an ineligible family member, assistance will be offered on a pro-rata basis in accordance with HUD Handbook 7465.7. Failure to accept pro-rated assistance will result in denial of assistance and the family will be removed from the waiting list. The verification of citizenship will occur only once for each member of the household.

4. **HUD's EIV System**

HUD's EIV system will also be used to verify if the family is being assisted under a HUD rental assistance program at another location or has a past due balance at another location. HACE staff will refer to HACE's EIV policy for guidance.

B. INCOME, ASSETS, AND INCOME EXCLUSIONS

1. Income

For the purpose of determining tenant rent and assistance payments in the Housing Choice Voucher Program, income is considered to be the annual income of all family members, monetary or not, which go to, or are on behalf of, the family, head or spouse, or any other family member; or are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and as defined in 24 CFR 5.609. This definition includes income earned on tangible and intangible asset(s) held by any family member, such as interest, dividends, and other net income of any kind from real or personal property.

2. Assets

Other than income, assets are also used to determine an applicant's rent. Assets include the following but are not limited to:

- Savings accounts;
- Checking accounts;
- Equity in real property;
- Stocks, bonds and treasury notes; and/or
- Whole life insurance policies.

Any asset valued at \$5,000 or less will be verified the 1st year and every 3rd year thereafter. However, verification of asset valued over \$5,000 can be made through any third party means in accordance with section A of this chapter.

3. Income Exclusions and Deductions

Certain income will be excluded when determining annual income of the family. HACE will exclude from its annual income determinations those amounts identified in 24 CFR 5.609 (c) and those amounts established by HUD in the following categories:

Deductions

- Exemption for elderly or disabled families;
- Medical expenses for elderly or disabled families;
- Auxiliary apparatus and attendant care expense for a member of the family who has a disability;
- Childcare expenses; and
- Exemption for minors, students, or persons with disabilities.

Exclusions

- Earned income of minors;
- Income of an eligible live-in aide; and
- Other amounts as defined in 24 CFR 5.609(c).

Eligible childcare expenses will be limited to the lesser of the amount earned by the family member enabled to work. Where more than one family member works, HACE will assume, for the purpose of determining this limitation, that the childcare expenses enable the lowest paid individual to work.

C. TOTAL TENANT PAYMENT AND MINIMUM RENT

1. Total Tenant Payment

HACE will calculate the Total Tenant Payment (“TTP”) of all participants in the Voucher Program in accordance with 24 CFR 5.628. The TTP is used to calculate the tenant rent in the Voucher Program.

2. Minimum Rent

HACE has established a minimum rent of fifty dollars (\$50) for Program participants. HACE will grant an exemption from the minimum rental amount in cases of family hardship for any of the following:

- a. The family has lost eligibility, or is awaiting an eligibility determination, for a federal, state, or local assistance program, including a family that includes a member who is a non-citizen, lawfully admitted for permanent residence under the Immigration and Nationality Act who would be entitled for public benefits but for Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996;
- b. The family would be evicted as a result of the imposition of the minimum rent requirement;
- c. The income of the family has decreased because of changed circumstance, including loss of employment;
- d. A death in the family has occurred;
- e. Other valid reasons approved by HACE on a case-by-case basis.

Families will be eligible for the hardship exemption only if the hardship is reported in writing to HACE. HACE will exempt the family beginning the month following the month in which the exemption was requested. Verification will be conducted and HACE will determine eligibility based upon the above-listed factors and HUD regulations.

- a. A temporary hardship is 2 months at minimum rent and must be reimbursed to HACE.
- b. A permanent hardship is over 2 months. The minimum rent will not be required to reimburse HACE.

3. Zero Income

In any instance, if a family reports that it has no income being received by family members, HACE will require that the family report and certify every 90 days following the initial reporting date as to the total household income. HACE may make further investigation into the family's information, if it appears that the family is receiving unreported income as defined in 24 CFR 5.609.

To establish any non-monetary contributions received by the family, HACE will require the completion of the "Zero Income Questionnaire".

4. Utility Allowances

A Utility Allowance Schedule will be developed by HACE for the Voucher Program. This Utility Allowance Schedule will be calculated using actual rates and average consumption estimates provided by the local utility companies. These allowances will be reviewed annually. New allowances will be issued whenever rates have been increased or decreased by at least 10% cumulatively.

For utilities paid by the family, HACE will include a utility allowance in the calculation of the family's share of rent. The utility allowance is used in determining the monthly Housing Assistance Payments (HAP) in the Housing Choice Voucher Program.

5. Utility Assistance Payments

HACE will pay on behalf of the tenant, an amount by which the housing assistance payment exceeds the rent to owner, directly to the utility company for gas, electric or water/sewer/trash. A Utility Assistance Payments ("UAP") check will be issued at the beginning of each month. It shall be the responsibility of the tenant to provide a utility account number.

4. BRIEFINGS AND VOUCHER ISSUANCE

A. BRIEFINGS

Housing Choice Voucher Briefing

When a family is to be issued a Voucher, they will receive an extended Voucher Briefing packet. The voucher packet is a step by step guide to leasing an apartment. The family is required to view the HACE HCV Briefing on our website in coordination with the packet.

The voucher briefing will also inform the family on how the HCV Program works including recertifications and interims, Housing Quality Standard Inspections, family and owner responsibilities, and where a family may lease a unit inside or outside HACE's jurisdiction. The family is issued their Voucher with the packet.

Voucher Briefing Packet Information

The applicant will be provided at a minimum the following materials:

- a. A Voucher packet containing items required by 24 CFR 982.301(b);
- b. Printed power point of the webinar.
- c. Instructions for submitting a unit
- d. RFTA, Amenities form and the HUD Tenancy Addendum
- e. Utility Allowance schedule
- f. City of Erie census tract
- g. A current list of available units and interested owners
- h. Requirements to reporting changes in family income and circumstances
- i. The HUD brochure, A Good Place to Live
- j. HUD Lead-Based Paint Brochure/Notification
- k. FSS Program brochure
- l. VAWA
- m. Fair Housing Equal Opportunity (FHEO) housing discrimination
- n. LGBTQ Equal Access to HUD Programs
- o. HACE Move-in/Move-out Checklist

Required Viewing of Voucher Briefing

The family is required to self-certify that they completed watching the video by submitting an email or written statement along with their voucher number. Failure to submit this certification will void submissions of RFTA's.

Expanded Housing Opportunities

The Housing Authority of the City of Erie includes with each voucher orientation packet a Housing Resource list that includes the names and telephone numbers of owners who are offering housing units throughout Erie.

HACE will assist families in negotiations with owners and provide any other recommendations relative to the families' needs for housing.

B. FAMILY OBLIGATIONS

The Voucher Program family must comply with the obligations described in 24 CFR 982.551 as identified in their signed Housing Choice Voucher, and as listed herein:

Providing Required Information

- The family must provide any information that HACE or HUD determines is necessary in the administration of the Program.
- The family must provide any information requested by HACE or HUD for use in a regularly scheduled reexamination or interim examination of family income and composition in accordance with HUD requirements.
- The family must provide and verify social security numbers, and must sign and submit consent forms, in accordance with 24 CFR part 5 subpart B.
- Any information provided by the family must be true and complete.

HQS Breach Caused by the Family

- The family is responsible for an HQS breach caused by the family as described in 24 CFR 982.404(b).

Allowing PHA Inspection

- The family must allow HACE to inspect the unit at reasonable times and after reasonable notice.

Violation of Lease

- The family may not commit any serious or repeated violations of the lease.

Family Notice of Move or Lease Termination

- The family must notify HACE and the owner before the family moves out of the unit or terminates the lease upon notice to the owner.

Owner Eviction Notice

- The family must promptly give HACE a copy of any owner eviction notice.

Use and Occupancy of the Unit

- The family must use the assisted unit for residence by the family, and the unit must be the family's only residence.
- The composition of the assisted family residing in the unit must be approved by HACE.
- The family must promptly notify HACE if a family member no longer resides in the unit.
- If HACE gives approval, a foster child or a live-in aide may reside in the unit.
- Members of the household may engage in legal profit-making activities in the unit, but only if such activities are incidental to primary use of the unit for residence by members of the family.
- The family must not sublease or sublet the unit.
- The family must not assign the lease or transfer the unit.

Absence from Unit

- The family must supply any information or certification requested by HACE to verify that the family is living in the unit, or relating to the family's absence from the unit, including any requested information or certification regarding the purposes of family absences.

Interest in Unit

- The family must not own or have any interest in the unit.

Fraud and Other Program Violation

- The members of the family must not commit fraud, bribery or any other corrupt or criminal act in connection with the Program.

Crime by Family Members

- The members of the family may not engage in drug-related criminal activity or violent criminal activity.

Other Housing Assistance

- An assisted family, or any member of the family, may not receive HCV tenant-based assistance while receiving another housing subsidy, for the same unit, or for a different unit under any duplicative federal, state, or local housing assistance program.

C. SUBSIDY STANDARDS

The unit size indicated on the Voucher issued to the family will be based on the following subsidy standards criteria:

1. Head of Household and spouse or persons engaged in any form of spousal relationship, will be assigned one bedroom.
2. All family members of the same gender will be assigned so that two persons will share the same bedroom. However, HACE has the discretion to separate same gender children that are 5 years apart.
3. Opposite gender persons may not be required to share the same bedroom.
4. Persons living as co-heads of the household (e.g., two sisters) can be eligible for separate bedrooms.
5. Subsidy standards will be based on a minimum of one person per bedroom size Voucher issued.
6. Family members may be issued separate bedrooms for medical reasons. A medical professional acceptable to HACE must verify a reasonable accommodation request to certify it is medically necessary.
7. A family that consists of a pregnant woman (with no other persons) will be treated as a two-bedroom family.

In determining the Voucher size to be issued, the following will also apply:

- Consideration will be given for a child who is away at school but returns to the unit during recesses.

- A child who is temporarily placed in foster care is considered a member of the family household.
- Any live-in aide approved by HACE to reside in the unit to care for a family member who is disabled, or elderly will be permitted a separate sleeping room. Only one (1) bedroom per household is permitted.
- Any family member leaving the household must prove new residency by submitting verification that is acceptable to HACE.

HACE will use the following standards in determining Voucher size:

VOUCHER SIZE	MINIMUM NO. PERSONS	MAXIMUM NO. PERSONS
SRO	1	1
0 BR	1	2
1 BR	1	2
2 BR	2	4
3 BR	3	6
4 BR	5	8
5 BR	6	10
6 BR	9	12

- Reasonable exceptions to these standards may be made at the discretion of the Executive Director or designee based upon individual circumstances.
- A family who chooses to lease a unit with fewer bedrooms than is listed on the family's Voucher must indicate their preferences in writing. HACE will determine if the unit size will meet Housing Quality Standards.

Over Housing/Under Housing

- a. If a family size decreases, the voucher size may also decrease. This will be effective at the annual recertification.
- b. If a family size increases and are now under housed, they may locate suitable housing immediately unless the family submits a written statement to stay in unit and receives HACE's approval.

D. VOUCHER TERM

At HACE 's discretion, vouchers may be issued at 60, 90 or the total 120 day term.

The voucher term plus any extensions may not exceed a total period of 120 days from the beginning of the initial term. HACE may grant an additional extension beyond the maximum of 120 days as reasonable accommodation for a family who includes a member who has a disability.

The family must submit a Request for Tenancy Approval within this term.

E. VOUCHER PORTABILITY

The term "portability" refers to the process of leasing a dwelling unit with tenant-based housing voucher assistance outside of the jurisdiction of the PHA that initially issues the family its voucher (the initial PHA). HACE will adhere to the Program regulations covering where a family may move and the responsibilities of the initial PHA and the receiving PHA (the PHA with jurisdiction over the area to which the family moves) found at §982.353 through §982.355, and Notice PIH 2008-43 HA.

Incoming Vouchers

HACE will accept families who have valid Vouchers from another Housing Authority's jurisdiction. HACE will have the discretion to bill incoming portable Vouchers or to absorb them. If an incoming portable family's income is greater than 30% of the area median income, HACE may bill the initial Housing Authority for the Voucher. HACE, as "receiving Housing Authority", may grant a 30 day extension in accordance with HUD.

Outgoing Vouchers

In some instances, a family may choose to move to a PHA's jurisdiction where housing costs and payment standards are higher than those in HACE's jurisdiction. In these situations, if the receiving PHA does not wish to absorb the family into its own program, and intends to bill HACE, there is a possibility that HACE may NOT have sufficient funding to support that assistance payment in the "higher cost" jurisdiction. Therefore, in some cases, because of limited availability of funds, a family may not be able to relocate into another jurisdiction with higher payment standards. HACE will make every effort to inform the family of these types of limitations prior to the family electing to use the portability feature in a higher cost area. HACE also has the right to waive the 12 month residency requirement so that a family may move to a location of their choice so long as the receiving Housing Authority agrees to this arrangement.

Denying Family Requests to Move Under the Portability Procedures

The housing choice voucher regulations at §982.353 provide that voucher holders (with the exception of non-resident applications) and participating families have the right to receive tenant-based voucher assistance in accordance with program requirements to lease a unit outside of the initial PHA jurisdiction. The family may lease a unit anywhere in the United States, provided the area is in the jurisdiction of a PHA with a tenant-based voucher program. HACE may only deny a family's request to move under portability if it has grounds to do so under the program regulations, which are as follows:

- HACE has grounds to deny the move because of the family's action or failure to act as described in §982.552 or §932.553. The Violence Against Women and Department of Justice Reauthorization Act of 2017 (VAWA) defines exceptions to these provisions. (See Chapter 2, Section A7)
- The family is a non-resident applicant, or the family was a non-resident applicant that has not yet been assisted in HACE's jurisdiction for 12 months since being admitted to the program (see §982.353(c)).
- The family is an applicant and is not income-eligible (see §982.535(d)(1)) in the area in which they wish to initially lease a unit.
- HACE does not have sufficient funding for continued assistance to support the move in accordance with §982.314(e)(1) and as described below.

Denying Portability Moves Due to Insufficient Funding

HACE may only deny a request to move to a higher cost area in accordance with §982.314(e)(1) if HACE is unable to avoid terminations of housing choice voucher assistance for current participants during the calendar year in order to remain within its budgetary allocation (including any available HAP reserves) for housing assistance payments. A "higher cost area" is defined as an area where a higher subsidy amount will be paid for a family because of higher payment standard amounts or "more generous" subsidy standards (e.g., the receiving PHA issues a 3-bedroom voucher to a family that received a 2-bedroom voucher from the initial PHA). Before denying the family's request to move due to insufficient funding, HACE must contact the receiving PHA and confirm that the receiving PHA will not absorb the family. If the receiving PHA is willing to absorb the family, there are no grounds to deny the portability move under §982.314(e)(1).

If HACE denies the family's request to move under §982.314(e)(1), it must promptly notify the family (assuming the family is still a participant in HACE's voucher program) once there is sufficient funding available to support the family's request to move. HACE will promptly process the family's request to move if the family indicates it still wishes to move at that time.

5. APPROVAL OF AN INITIAL LEASE

A. REQUEST FOR APPROVAL TO LEASE A UNIT

The family must submit to HACE a Request for Tenancy Approval (RFTA), Amenities form, and a proposed lease that includes HUD's Tenancy Addendum. All documents must be submitted during the term of the Voucher.

B. APPROVAL PROCESS

After the family submits a Request for Tenancy Approval and required forms HACE will review the documents for approval in accordance with the following:

1. Determine if the lease can be approved and includes the Tenancy Addendum;
2. Determine if the rent is reasonable and within applicable limits;
3. Negotiate the rent, if required;
4. Determine compliance of leasing to family members;
5. Determine if the property and owners are eligible to participate in the HCV Program;
6. Inspect and approve the unit for HCV Program;
7. Advise the owner of their responsibility to screen the prospective tenant as HACE has not screened the family's behavior or suitability for tenancy; and
8. Provide the following information to the owner:
 - The family's current address; and
 - The name and address (if known to HACE) of the owner of the family's current and prior addresses.

Conditions 1 through 6 above must be met before the lease will be approved.

C. ADDITIONAL DOCUMENTATION

House Rules of the owner may be attached to the lease as an addendum. Owners will be requested to file a change of address with the HCV Program Office when applicable.

D. DISAPPROVAL OF OWNER

HACE will refuse to enter into a HAP contract and deny approval to lease a unit from an owner for any of the following reasons:

- The owner has been debarred, suspended or subject to a limited denial of participation under 24 CFR part 24;
- The owner has a history of refusing to terminate tenancy of families who threaten the health or safety of other residents, managers, HACE employees; who disturb the peaceful enjoyment of others residing in the immediate vicinity; or who engage in drug-related or criminal activity; or
- The owner has violated obligations under a HAP contract;
- The owner has committed fraud, bribery or any other corrupt or criminal act in connection with any federal housing program;
- The owner has engaged in drug trafficking.
- The owner has a history or practice of non-compliance with HQS for units leased under HCV Program or with applicable housing standards for units leased with project-based HCV assistance or leased under any other federal housing program;
- The owner has a history or practice of renting units that fail to meet state or local codes; or
- The owner refuses (or has a history of refusing) to evict families for drug-related or violent criminal activity, or for activity that threatens the health, safety or right of peaceful enjoyment of the premises by tenants, Housing Authority of the City of Erie employees or owner employees or residences by neighbors; or
- The owner has failed to pay or has failed to certify to the payment of county, city, and school taxes, and municipal services.
- The owner is a current Registered Sex Offender or Lifetime Sex Offender.
- The owner has an outstanding balance owed to HACE.

For purposes of this Admin Plan, "owner" includes any principal or other interested party.

E. FAIR MARKET RENT/PAYMENT STANDARD LIMITATIONS

HACE establishes the Payment Standard for the Housing Choice Voucher Program each time there is a change to the HUD-published Fair Market Rent ("FMR"). The payment Standard for the Voucher Program will be reviewed annually and may be increased/decreased in response to changes in the FMR limitations. In no event will the payment Standard be less than 90% or greater than 110% of the applicable FMR.

Families under a HAP Contract will be held harmless, with no reduction in subsidy, for as long as the family continues to receive the voucher assistance in that unit.

F. EXCEPTION PAYMENT STANDARDS

Subject to HUD approval, HACE may designate an area (or areas) in its jurisdiction as an "exception area". Exception Payment Standards, if utilized, will be greater than 110%, but no more than 120% of the existing FMRs as established by HUD. In approving tenancies with higher payment standards in exception areas, the rents may be limited by rent reasonableness as described in Section G of this chapter.

HACE may request, and HUD may approve, an exception payment standard amount if required as reasonable accommodation for a family that includes a person with disabilities. Such cases will be assessed for consideration on an individual basis.

G. REASONABLE RENT DETERMINATIONS

For the Housing Choice Voucher Program, HACE will make a determination as to the reasonableness of the rent the owner is proposing in relation to comparable units in accordance with 24 CFR 982.507.

1. HACE will determine rent reasonableness in the following instances:
 - When units are initially leased;
 - Before any increase in rent to owner;
 - When a 10% decrease in the FMR occurs; and
 - If directed by HUD.

2. HACE will determine rent reasonableness based on the following:
 - Three comparable unassisted units in the neighborhood;
 - The previous rent charged on requested unit; and
 - Other units in the building (apartment complex).

NOTE: Copies of the rent reasonableness form will be maintained in each tenant file. If three comparable unassisted units cannot be located due to local rental market size, one unit will be sufficient to prove rent reasonableness.

3 For initial Voucher tenancies, HACE will:

- Provide guidance and advice to the family on whether the rent is reasonable and the unit is affordable;
- Assist the family in negotiating the owner's rent if requested by the family;
- Not approve any new move in where the family will pay an amount for rent that exceeds 40% of the family's monthly adjusted income (except as provided by HUD); and
- Use the rent reasonableness determination to disapprove owner rents.

H. SECURITY DEPOSIT REQUIREMENTS

HACE will deny approval of a lease where a request has been made to collect from a family a security deposit that is in excess of PA landlord and tenant law, private market practice or in excess of amounts charged by the owner to unassisted tenants. Generally, in the Erie market area, and for the purposes of determining private market practice herein, a security deposit equal to 1 month's rent to the owner is considered to be the standard.

When the tenant vacates a dwelling unit, the owner, subject to state or local law, may use the security deposit, including any interest thereon, in accordance with the lease, as reimbursements for any unpaid rent payable by the tenant, damages to the unit or for other amounts the tenant owes under the lease.

I. SEPARATE AGREEMENTS ACCEPTABLE TO THE HACE

Families are permitted to pay extra charges for additional amenities that are not included in the same rent for other units in the building or in other comparable apartments or houses (e.g., membership for swimming pool, use of parking facilities or furniture). Copies of all agreements for special charges or services must be submitted to HACE in writing for approval. HACE will review the agreements to determine whether they are acceptable and reasonable.

Nonpayment of extra charges from separate agreements may not be considered a violation of the lease covered under the HAP contract.

6. HOUSING QUALITY STANDARDS INSPECTIONS

A. HOUSING QUALITY STANDARDS APPROACH

The Housing Authority of the City of Erie will continue to assure that all units in its HCV Program meet the Housing Quality Standards ("HQS") as defined in 24 CFR 982.401. Inspections for HQS compliance will be conducted initially prior to leasing and biennially during the term of the lease. Additional inspections may occur if deemed to be necessary by HACE, the owner or family.

HACE employs or contracts with qualified housing inspectors who have been trained on the HQS requirements. Each inspection conducted will be recorded on an inspection form which is prescribed by HUD. All inspection documents will be retained by HACE in accordance with HUD requirements.

The inspection type will be indicated on the inspection form as one of the following categories:

- Initial inspection
- Biennial Inspection
- Special Inspection (compliant or quality control)

As part HACE's responsibility to assure HQS compliance, corrective action will always be required on units that do not meet the inspection criteria. Enforcement of HQS may include abatement of assistance payments to an owner or the termination of the HAP contract for violating its terms. An initial HAP contract will not be executed by HACE before the unit passes inspection.

The owner will be allowed 2 re-inspections for deficiencies to be corrected, at HACE's discretion, depending on the amount and complexity of work to be done.

B. VARIATIONS TO HQS

HACE will inspect units in its HCV Program based upon HQS. HACE has included, in its inspection regulations, additional local codes for acceptability under Plumbing and General Health and Safety. HACE is in compliance with the most current building codes adopted by the City of Erie. All plumbing contained in the assisted structure and all windows with respect to storm windows within the assisted unit meet the applicable requirements of the City of Erie.

A. ACCEPTABLE METHODS OF INSPECTIONS

A physical inspection is the standard method of inspection. HACE shall consider the following methods acceptable forms of verification that a unit complies with HQS standards:

1. Owner/Participant provided photo of a repair
2. Video Inspection conducted between HACE HCV Inspector, Owner and/or Participant

It is the responsibility of HACE to determine the appropriate acceptable method of inspection.

D. INITIAL INSPECTIONS

Inspections will be conducted prior to a family's leasing of a unit under the Housing Choice Voucher Program. Once a family submits a Request for Tenancy Approval ("RFTA") or other HUD required request forms, HACE will promptly process the request, and the inspector will schedule an appointment with the owner and/or family to occur within 15 days of the RFTA submission unless otherwise delayed by the owner or tenant, or due to other reasons outside of HACE's control. The RFTA must be properly completed and signed by both the family and owner before the HACE will process the request and inspect the unit.

During the inspection, the inspector may provide the owner with general information about the HCV Program or specific information pertaining to HQS. In addition, the inspector may negotiate the rental amount.

Immediately following a "failed" initial inspection, HACE will issue to the owner of the property a notice of the deficiencies and a time limit for correction. The owner generally will be given up to 30 days to correct the deficient item(s). HACE's Executive Director or designee may approve a reasonable extension of time depending upon the extent or scope of work required or weather conditions that prohibit remediation. In all cases, the owner will be encouraged to correct the deficiencies in a timely manner. The deficiency notice will instruct the owner to contact HACE after all cited deficiencies have been corrected.

After the expiration date of the deficiency notice (or any approved extension thereof), the lease approval request will automatically be denied. Provided that time remains on their Voucher, the family may submit another Request for Tenancy Approval for the same unit or for another unit. Only one Request for Tenancy Approval form may be submitted at a time.

E. BIENNIAL INSPECTIONS

Each unit under the HCV Program must be inspected after the 1st year of the HAP Contract to ensure continued compliance with Housing Quality Standards and/or any approved local variances. After the initial inspection biennial inspections will proceed. Eligibility for biennials will be at HACE's discretion.

HACE maintains an accurate report of all units in its Housing Choice Voucher Program which includes biennial HQS inspections to ensure that each unit is inspected within 730 days of the last full inspection. Immediately following a "failed" inspection, HACE will issue to the owner of the property a notice of the deficiencies and a time limit for correction. The owner will be given a 24 hour notice or up to 30 days to correct the deficient item(s).

Due to unpredictable weather during the months of November through May, HACE may allow the owner to delay correcting exterior deficiencies that exist in such areas as painting and concrete. All work must be completed by June 1 of the given year. Non-compliance by the owner will result in the termination of the HAP contract.

F. SPECIAL INSPECTIONS

Complaint

If an owner or family complains that an unsatisfactory condition exists with respect to HQS, HACE may promptly conduct a complaint inspection. Immediately following a "failed" complaint inspection, HACE will issue to the owner of the property and family a notice of deficiencies and a time limit for correction.

Quality Control

For monitoring purposes, HACE will conduct a Quality Control inspection on a minimum number of units under HAP Contract as defined in Chapter 14 of the Plan and in accordance with HUD regulations.

G. ENFORCEMENT OF INSPECTION STANDARDS

Following each inspection, HACE will notify the owner and/or tenant of the results and, if necessary, a deadline for compliance with HQS. Regardless of how the deficiencies were caused, housing assistance payments will be abated if the HQS deficiencies are not corrected by the compliance date. Reinspection's by HACE to verify HQS compliance will include only those fail items for which the owner (and/or tenant) was previously notified. If new deficiencies are discovered during a reinspection, a new deficiency notice will be issued, which will contain a compliance deadline date for the new deficiencies.

Owner HQS Responsibilities and Related Actions:

1. The owner must maintain the assisted unit in accordance with HQS.
2. HACE will take prompt action to enforce the owner's obligations for owner breach of the HQS.
3. HACE will notify the owner and tenant of HQS deficiencies for which the owner is responsible. The notice will provide for the following:
 - For HQS failures, the owner will be given up to 30 days to correct the item(s). HACE Executive Director or designee may, at their discretion, approve a reasonable extension of time depending upon the extent or scope of work required.
 - If the defect is life threatening to the family's health or safety, the owner will be given 24 hours to correct the violation.

- If the owner fails to correct failed items, the payment will be abated, or the HAP Contract will be terminated.
4. HACE will not make any assistance payments for a dwelling unit in which HQS deficiencies have not been corrected after the notice period has expired.
 5. If “life threatening” deficiencies are not corrected within 24 hours, the owner will be given notice of intent to terminate the HAP Contract and the Housing Assistance Payment will be abated through the Termination Notice period.
 6. The owner will not be responsible for a breach of the HQS not caused by the owner, and for which the family is responsible. HACE may, however, terminate assistance to the family because of a breach caused by the family.

Family HQS Responsibilities and Related Actions:

1. The family is responsible for a breach of the HQS as listed in 24 CFR 982.404(b)(1) and as described herein:
 - The family fails to pay for any utilities that are to be paid for by the family;
 - The family fails to provide and maintain any appliances that are required to be provided by the family; or
 - Any member of the household or guest damages the dwelling unit or premises.
2. HACE will take prompt action to enforce the family obligations for the family’s breach of the HQS.
3. HACE will notify the owner and tenant of the HQS deficiencies for which the family is responsible. The notice will provide for the following:
 - For HQS failures, the family will be given up to 30 days to correct the item(s). HACE Executive Director or designee may, at their discretion, approve a reasonable extension of time depending upon the extent of scope of work required.
 - If the defect is “life threatening”, the family will be given 24 hours to correct the violation.
 - If the family fails to correct failed items, HACE may terminate the family assistance in accordance with 24 CFR 982.552.

H. 24 HOUR DEFICIENCIES (LIFE THREATENING)

The following failed inspection items will be considered emergency violations and must be corrected within 24 hours. At HACE's discretion, other life-threatening conditions may exist that are not listed below.

1. Air quality – propane, natural gas, or methane gas detected
2. Misaligned chimney, flue or ventilation system
3. Electrical shock or fire hazard – exposed wires; open panels; water leaks on or near electrical equipment; missing breakers or fuses; missing covers; missing or broken outlets; switch or cover plates
4. Waterlogged ceiling in imminent danger of falling
5. Lack of unit security
6. Utilities not in service
7. Lack of sufficient heat to maintain adequate inside temperatures
8. Major plumbing leaks or flooding
9. No running hot water
10. Lack of functioning toilet
11. Smoke detector – missing or inoperable
12. Carbon Monoxide Alarm – missing or inoperable
13. Emergency/fire exits – blocked or unusable
14. Fire escapes – blocked egress or ladders or visibly missing components
15. Flammable materials – improperly stores or located

I. ABATEMENT OF PAYMENT

24 Hour Notice

If a unit fails to meet Housing Quality Standards and the owner and tenant have been given a 24 hour deficiency notice for compliance, and all deficiencies have not been corrected within that period, the Housing Assistance Payment ("HAP") will be abated the first of the month following the deficiency notice.

30 Day Notice

If a unit fails to meet HQS and the owner and tenant have been given a 30 day notice of deficiency and the deficiencies have not been corrected within 30 days, the HAP will be abated the first of the month following the 30 day notice. A request for an additional 30 days may be reviewed for approval upon tenant and/or owner request.

J. HAP CONTRACT TERMINATION

HACE will terminate a HAP Contract for non-compliance with the HQS requirements. An advance notice of termination (usually 30 days) will be sent by First Class Mail to the owner to inform them of the termination date and the reason. In addition, the family will be notified promptly of the termination notice and will be offered a Voucher to relocate, as appropriate. Generally, the termination will be effective the day following the last day of the abatement period. However, depending upon the seriousness or recurrence of the deficiency, HACE may not provide an abatement period and may simply terminate the HAP Contract for non-compliance.

In the event that a unit under an active HAP Contract passes inspection during an abatement period or after HACE provides notice of the termination, the owner and family may agree to continue the lease if the family has not yet relocated. No assistance payment can be made for the period that the unit did not pass inspection during the abatement period.

K. NOTIFICATION OF INSPECTION

Participant families will be provided reasonable notice of the date and time inspections are to be conducted by HACE. If the family is unable to be at home, they must either arrange for an adult representative to be present for the inspection or contact the HCV Program Office to reschedule. If the family or representative is not home for the appointment, and the inspector does not gain entry, HACE will consider it to be a missed inspection. HACE will schedule a second appointment in the same manner.

If the family misses two (2) scheduled inspection appointments, HACE will terminate their assistance for violating the Family Obligations as defined in 24 CFR 982.551(d). The family has a right to dispute the termination through HACE's informal hearing process.

7. PAYMENTS TO OWNERS

A. HOUSING ASSISTANCE PAYMENTS

HACE provides rental assistance for its participants by making Housing Assistance Payments to the owner. The Housing Assistance payment is calculated by HACE based upon the contract rent and Total Tenant Payment.

When the unit has passed HQS and HACE has processed all the required documents, the owner and the family will execute the lease and the Tenancy Addendum. The owner and HACE will then execute the HAP Contract within 60 days.

Upon execution of the HAP Contract, all pertinent information regarding the owner and the HAP payment will be included in the HAP Register. In accordance with the HAP Contract, HACE considers the HAP payment received by the owner after disbursement has been deposited into the authorized designated owner/agent account.

B. ADJUSTMENTS OF RENT TO OWNER

Owners may not request rent increases prior to the expiration of the first term of the lease. Thereafter, owners will receive notification of their tenant's annual recertification, informing them how and when they may request an increase. It is the owner's responsibility to notify the tenant of their request. The new proposed rent must meet the rent reasonableness requirements, otherwise HACE will deny the increase. Only annual increases in accordance with 24 CFR 982.507 are permitted.

8. REEXAMINATIONS

HACE will, for each family who participates in the HCV Program, examine family income, size, and composition at admission and at least annually for the purposes of determining rent, assistance payments and eligibility. The examination will include a review of income and other family information. Verification will be in accordance with Chapter 3 of this Plan. The family must submit documentation and verification that HACE deems to be necessary for the purpose of determining annual income, adjusted income, or total tenant payment, or for the purpose of auditing the family's eligibility to receive assistance. Families with fixed incomes may be eligible for triennial reexaminations.

A. REPORTING REQUIREMENTS

1. Families who participate in the HCV Program must report all changes in family income, assets, composition and other related items as identified in 24 CFR parts 5 subpart B in accordance with the "Reporting" requirements of this Plan. Participants who report no income will be subject to the "Zero Income" requirements of this Plan.
2. Families must supply all information requested by HACE or HUD for use during admission of an applicant, a regularly scheduled reexamination or interim reexamination of family income and composition in accordance with HUD requirements. "Information" includes any requested certification, release or documentation.
3. HACE must approve the composition of the assisted unit including approval of the inclusion of a foster child or live-in aide.
4. Any information supplied by the family must be true and correct.
5. Failure by the family to comply with these reporting requirements is considered to be a violation of their obligations and grounds for termination of participation.

B. REPORTING EXCEPTIONS

Families who receive Social Security, Social Security Disability or Supplemental Security Income (SSI) are not required to report their annual increase when it occurs. HACE will not increase the family's total tenant payment until their next regularly scheduled annual reexamination except when an interim recertification is necessary as a result of any other changes listed in the "Reporting Requirements" section of this chapter.

C. ZERO INCOME

In any instance, if a family reports that it has no income being received by family members, HACE will require that the family report and certify every 90 days following the initial reporting date as to the total household income. HACE may make further investigation into the family's information, if it appears that the family is receiving unreported income as defined in 24 CFR 5.609.

To establish any non-monetary contributions received by the family, HACE will require the completion of the "Zero Income Questionnaire".

D. ANNUAL REEXAMINATION

1. Effective on the anniversary date, HACE will conduct a reexamination of the family's income, composition and circumstances. The process will begin approximately 90 days prior to the anniversary date, when HACE will mail the family a continued occupancy packet and other forms deemed to be necessary by HACE for the purpose of the reexamination.
2. Annual reexamination may be conducted in person, mail, phone or any communication approved by HACE.
3. Failure by the family to comply with HACE's requests for information or to sign consent forms will result in the termination of the family's participation in the HCV Program. The family will have the right to an informal hearing in accordance with Chapter 12 of this Plan.
4. The effective date of an annual reexamination will occur on the annual reexamination anniversary date of the family.

Family Obligation to Recertify:

The family will be mailed a recertification packet that includes a HCV Occupancy form, authorization for release and other required forms that must be completed and returned with the income, expense, asset, and all other requested documentation by due dates listed.

The annual recertification notice will state the following "Important Dates" for compliance and penalties for non-compliance. If a participant fails to comply and provide the required information, the owner and participant will be notified that the HAP Contract and assistance will be terminated for tenant violation of 24 CFR 982.551(b), *failing to supply required information*, under the Family Obligations. The family may request an informal hearing (see Chapter 12) within the due date listed on the annual recertification notice.

Completion of the Annual Reexaminations

The family's TTP will be calculated based upon the information provided and verified during the annual reexamination. However, HACE may determine the TTP by disallowing deductions and or allowances that it could not substantiate through reasonable verification means. Any changes will be effective on the annual reexamination effective date except as provided under paragraph **G** of this chapter.

E. TRIENNIAL REEXAMINATION

The exception to annual recertifications will be for families with incomes that are made up of 100% fixed income. 24 CFR parts 5, 891, 960 and 982 permits Public Housing Authorities to eliminate annual income reviews in some years by applying a COLA determined by the Federal Government to fixed income sources. All other forms must still be completed, signed, and dated yearly.

F. INTERIM REEXAMINATION

If any changes of family composition or a decrease of income occur prior to scheduled reexamination, the family is required to report those changes within 20 days to HACE. Once reported, an interim reexamination will be conducted.

1. Families must report all changes in family income, assets, size, and composition when they occur. HACE will conduct interim reexaminations between annual reexaminations in accordance with HUD requirements and the provisions of this Plan. HACE will not increase the family's rent between annual reexamination unless there is a change in the source of income of any member, or if a new family member has an additional source of income in the household.
2. Any decrease in rent that results from a decrease in income will be effective the first of the month following the reported change. All reported decreases must first be properly verified in accordance with the provisions of this Administrative Plan.
3. Any interim reexamination that results in an increase in rent will become effective the first day of the second month following the increase in income, except as provided in paragraph **F-1** of this chapter.
4. Any change that results from the interim reexamination will continue until the next scheduled annual reexamination whereby all applicable information will be used in accordance with HUD regulations.

5. Families whose welfare assistance is reduced specifically because of fraud or failure to participate in an economic self-sufficiency program or comply with a work activities requirement will not have their TTPs reduced based upon the benefit reduction. HACE will obtain verification from the welfare agency prior to denying any request for an income reexamination under this paragraph.

G. DISALLOWANCE OF EARNED INCOME FOR PERSONS WITH DISABILITIES

1. Initial 12-Month Period

HACE will not increase the portion of rent of a qualified disabled family member as a result of increased income due to employment during the 12 month period beginning on the date on which the employment commenced. Eligible families are those who participate in the HCV Program:

- a. Whose income increases as a result of employment of a disabled member of the family who was previously unemployed for 1 year or more. For purposes of this section, "previously unemployed" is a person who has earned, in the previous 12 months no more than would be received for 10 hours of work per week for 50 weeks at the established minimum wage;
- b. Whose earned income increases during the participation of a disabled family member in any family self-sufficiency or other job-related training program; or
- c. Whose annual income increases as a result of new employment or increased earnings of a disabled family member, during or within the last 6 months after receiving assistance, benefits, or services under any state program for Temporary Assistance for Needy Families (TANF) funded under Part A Title IV of the Social Security Act, as determined by the PHA in consultation with the local agencies administering TANF and Welfare-to-Work programs.

The TANF program is not limited to monthly income maintenance, but also includes such benefits and services as one-time payments, wage subsidies and transportation assistance, provided that the total amount over a 6-month period is at least \$500.

2. Phase-in of Rent Increases in second year

Upon expiration of the initial 12-month period described in paragraph (1) of this section, the rent payable by a family may be increased due to continued employment of a disabled family member. In the second year of the 12-month disallowance, the increase may not be greater than 50 percent of the amount of the individual's total income increase.

3. Maximum Two-Year Disallowance

The disallowance of increased income of an individual family member, as provided in the previous paragraphs of this section (G), is limited to a lifetime 24-month period. It only applies for a maximum disallowance of twelve months for each instance, (100% disallowance under paragraph G-1 and the 50% disallowance under paragraph G-2).

H. REPORTING REQUIREMENT

1. Families who participate in the HCV program must report all changes in family composition and/or income, and other related items within 20 days of the change. Such changes must be reported in accordance with the "Reporting" requirements of this Policy. Participants who report no income will be subject to the "Zero Income" requirements of this Policy.
2. Families must supply all information requested by HACE or HUD for use in admission of an applicant, a regularly scheduled reexamination or interim reexamination of family income and composition in accordance with HUD requirements. "Information" includes any requested documentation, release or certification.
3. HACE must approve the composition of the assisted unit including approval of the inclusion of a foster child or live-in aide.
4. Any information supplied by the family must be true and correct.
5. Failure by the family to report, within 20 days, applicable changes that would increase TTP will result in HACE's calculating a "retroactive rent" for the family based upon the actual date of the changes. A retroactive rent will be determined by calculating the TTP that the family should have paid during the period that the changes were not reported and subtracting that total from the amount of TTP the family actually paid for the same time period. This retroactive rent amount may either be paid in one payment or by a repayment agreement in accordance with Chapter 13 of this Plan. If HACE believes that any action or inaction under this paragraph is intentional, HACE may simply terminate the participation of the family and initiate court action to recover monetary damages.
6. Failure by the family to comply with these reporting requirements is considered to be a violation of their obligations and grounds for termination of participation.

I. INCORRECT REPORTING

In any instance, if HACE believes that a family has provided false, misleading, or deliberately inaccurate information to HACE, HACE may conduct additional investigation to obtain reasonable evidence, and terminate the family's assistance with proper notice, and/or prosecute the family in accordance with the law. Where evidence of fraud exists, HACE may refer all information to HUD's Office of Inspector General for further investigation.

9. SPECIAL FAMILY CIRCUMSTANCES

A. FAMILY BREAKUP

If the family breaks up, HACE may terminate the HAP contract or may continue housing assistance payments on behalf of family members. The factors to be considered in making this decision are based on the following:

- Whether the assistance should remain with family members remaining in the original assisted unit.
- The interest of minor children or ill, elderly or disabled family members.
- Whether actual or threatened domestic violence was involved in the breakup.
- If a judicial decree is issued by the courts in a divorce, HACE will be bound by the court's determination as to which family member will continue to receive the Program assistance.

B. REMAINING MEMBER OF THE FAMILY

"Remaining family member" is defined as a family member of an assisted tenant family who remains in the unit when other members of the family have moved out or are deceased. A minor is not considered to be a remaining member of the family, unless:

- The minor has been declared emancipated by the courts; or
- A caretaker who has been appointed by the courts to oversee the welfare of the minor moves into the unit.

If guardianship is awarded to the caretaker, a new Voucher may be required due to the new family composition.

C. SINGLE MEMBER HOUSEHOLD

The HAP Contract terminates automatically upon the death of a single member household, including single member households with a live-in aide.

D. TEMPORARILY ABSENT CHILD

For the purposes of determining family composition, a temporarily absent child is considered to be part of the assisted household. This statutory provision is intended to promote family reunification by permitting the family to rent a unit that will be large enough to accommodate the whole family when the absent child returns from foster care.

E. JOINT CUSTODY OF MINORS

Minors must reside within the assisted household over 50% of the time to be considered a member of that household. Verification will be required through documentation provided by the court.

In the event there is joint custody, HACE shall make a reasonable determination of family composition using, but not limited to, the following resources:

- Benefits received
- School enrollment
- Limited medical records
- A notarized statement from the parents

F. LIVE-IN AIDE:

In addition to family members, a live-in aide may be considered to be part of the household for the care and well-being of one or more elderly or near-elderly persons or persons with disabilities in accordance with 24 CFR 966.4. The live-in aide must vacate the premises when the family member who requires the assistance moves from the unit and/or the live-in aide is no longer required for assistance.

HACE will require that the live-in aide is:

- Is essential to the care and well-being of that person;
- Is not obligated for the support of the person;
- Would not be living in the unit, except to provide the necessary supportive services; and
- Is not a sex offender subject to a lifetime registration.

HACE will also require a request for a reasonable accommodation, from a medical professional who is familiar with the family member, to certify that a live-in aide is medically necessary for the care and well-being of the family member. A determination of the acceptability of such statement will be made by HACE prior to approval of the live-in aide.

G. DISAPPROVAL OF LIVE-IN AIDE

At any time HACE will withdraw the approval of a live-in aide, in accordance with 24 CFR 982.316, if the live-in aide:

- Commits fraud, bribery or any other corrupt or criminal act in connection with any federal housing program;
- Commits drug-related criminal activity or violent criminal activity;
- Currently owes rent or other amounts to HACE in connection with any HCV Program or public housing assistance under the 1937 Act; or
- Has a record of disturbance of neighbors, destruction of property, or living or housekeeping habits at prior residences which may adversely affect the health, safety and welfare of other residents or neighbors.

If the live-in aide has their approval withdrawn, they are no longer eligible to remain in the assisted unit and will be considered to be an ineligible member of the household. If the ineligible member remains in the unit after HACE provides notice of the ineligibility, HACE will terminate assistance to the family.

H. VAWA

The ***Violence Against Women and Justice Department Reauthorization Act of 2017 (VAWA)*** is a gender neutral protection for the victims of domestic abuse. Accordingly, victims of domestic abuse will not be discriminated against during the application process with regard to eligibility, or have penalties regarding continued participation/tenancy if a household member is the victim of domestic violence, dating violence, or stalking.

HACE may not consider incidents of domestic violence, dating violence, or stalking as serious or repeated violations of the lease or "good cause" for termination of assistance, tenancy, or occupancy rights of the victim of abuse.

HACE may not consider criminal activity directly relating to abuse, engaged in by a member of the tenant's household or any guest or other person under the tenant's control, cause for termination of assistance, tenancy, or occupancy rights if the tenant or an immediate member of the tenant's family is the victim or threatened victim of that abuse.

HACE may request, in writing, that the victim, or a family member on the victim's behalf, certify that the individual is a victim of abuse and that the form *HUD-5382 Certification of Domestic Violence, Sexual Assault, or Stalking, and Alternate Documentation* or other documentation as noted on the certified form, be completed, and submitted within 14 days, or an agreed upon extension date, to receive protection under VAWA. Failure to provide the certification or other supporting documentation within the specified timeframe may result in eviction or the termination of rental assistance.

All HACE tenants/participants will sign a Lease Addendum (Form HUD-91067) informing them of their rights under VAWA.

10. EXCLUSIONS TO HOUSEHOLD

A. GENERAL POLICY

Income and the Total Tenant Payment are calculated in accordance with 24 CFR part 5, subpart F for all family members who reside in the household.

B. ABSENT FAMILY/FAMILY MEMBER

The family must declare any family member who is permanently or temporarily absent by notifying HACE in writing. HACE will advise the family at the time how this may affect the Total Tenant Payment and/or the Voucher size. HACE will utilize the following in determining temporary/permanent absences:

1. Absence by the family from their unit for more than 90 days will be considered by HACE to be abandonment of the unit. The family's assistance will be terminated and they will be provided an opportunity to request an informal hearing. (See Section F of this chapter for abandonment)
2. If a member of the family leaves the unit for 90 days or more, they will be considered to be permanently absent. HACE will determine if the family's unit size must be changed to meet the subsidy standards. HACE will review each family's circumstances on a case-by-case basis.
3. If a single-member household is absent for more than 90 days, their assistance will be terminated, unless they request and are granted an extension. Third-party documentation acceptable to HACE must be submitted that indicates they will return within the next 90 days (maximum absence cannot exceed 180 days).

C. TEMPORARILY ABSENT FAMILY MEMBER'S INCOME

HACE will include the income of all temporarily absent family members when determining the TTP. If the spouse or the head of household is temporarily absent, their entire income is counted. If a household member is temporarily in a long term care facility, a determination will be reviewed on a case by case basis.

D. OTHER ABSENT FAMILY MEMBERS

The following will be considered to be permanently absent family members and will not be included in the household:

- Family members in the military (excluding head, spouse or co-head); and
- Children who do not reside in the household over 50% of the time; and
- Family members who have been incarcerated for more than 180 days.

E. VISITORS

Overnight adult guests are permitted to visit for up to 14 days in a calendar year with HACE's written approval. If the visitor stays for more than 14 days in the year, it will be considered to be a violation of the Family Obligations and grounds for termination of assistance to the family.

F. ABANDONMENT OF UNIT

1. Abandonment of the leased premises by the family shall be presumed when the family moves out all or substantially all of the family's goods and personal items from the leased premises, and (a) any rent becomes due and unpaid, and/or (b) notice to terminate for any other lease violation has been served, and/or (c) mail is undeliverable or has been returned to the owner and/or HACE.
2. Upon abandonment of the leased premises by family, the owner should mail a written notice to the family that they plan to re-enter the leased premises and take possession of the same and that they shall dispose of any remaining goods and personal property in the leased premises in accordance with State law.

11. TERMINATIONS AND FAMILY MOVES

A. LEASE TERMINATION

Owner

1. During the initial term of the lease or during any renewal term, the owner may only terminate the tenancy because of:
 - a. Serious or repeated violations of the lease.
 - b. Criminal activity, which includes, but is not limited to:
 - 1) Illegal use of a controlled substance;
 - 2) Any drug-related criminal activity on or near the premises;
 - 3) Alcohol abuse and any criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises by other residents; or
 - 4) Other good cause, which includes, but is not limited to:
 - Disturbance of neighbors.
 - Destruction of property.
 - Living or housekeeping habits that cause damage to the unit or premises.
2. After the 1st year of the lease, the owner must give at least a 60 day notice to terminate the lease for other good cause as follows:
 - a. A business or economic reason for termination of the tenancy (such as sale of the property, renovation of the unit, or the owner's desire to rent the unit for a higher rent).

Family

1. The family may terminate the lease without cause at any time after the 1st year provided that the family notifies the owner and HACE at least 30 days, but no more than 60 days, before the termination. (See Section D of this chapter for family moves)

Mutual Agreement

1. During the 1st year of the lease, the tenant and owner may agree to terminate the lease. A copy of the termination agreement must be provided to HACE at least 30 days prior to the move.

B. HAP CONTRACT TERMINATION

Owner

1. The HAP contract terminates when:
 - a. The owner has legal possession of the unit subsequent to an eviction; or
 - b. The owner notifies the tenant and HACE that they no longer intend to participate in the Program.

HACE

1. The HAP contract will terminate automatically when:
 - a. The lease terminates;
 - b. HACE terminates assistance to the family;
 - c. The family moves from the contract unit;
 - d. 180 days have elapsed since the last Housing Assistance Payment to the owner;
 - e. Available Program funding is not sufficient to support continued assistance for the family;
 - f. The contract unit does not meet the subsidy standards;
 - g. The contract unit does not meet all requirements of the HQS; or
 - h. The owner has breached the HAP contract.

C. TERMINATION OF ASSISTANCE TO FAMILY

HACE may at any time terminate Program assistance for a participant for any of the following reasons:

1. If the family violates its obligations under the Program as required by 24 CFR 982.551;
2. If the family does not comply with the regulations listed in 24 CFR 982.552 (b) and (c);
3. If HACE determines that any family member has engaged in illegal drug activity, criminal activity, or alcohol abuse (see applicable definitions in Chapter 2 of this Plan); or
4. If the family commits fraud in connection with the HCV Program.

HACE will immediately and permanently terminate the HCV assistance, of persons who are convicted of manufacturing or producing methamphetamine on the premises of the assisted housing development or unit in violation of any federal or state law. "Premises" is defined as the building or complex in which the dwelling unit is located, including common areas and grounds.

D. FAMILY MOVES

Transfers

If the family desires to move to a new unit, HACE will issue to the family a new Voucher if the family has complied with all the tenant obligations while in their current unit. However, if HACE does not have sufficient funding for continued assistance, no move will be permitted.

If a family moves to another unit without notifying HACE in writing, it will be a violation of the Family Obligation(s) and reason for termination.

Number of Moves

Families may not move during the 1st year of the lease, unless for good cause. HACE will limit the number of moves that a HCV Program family may make to 1 per year.

Charges against Security Deposit:

If the owner is claiming damages, unpaid rent or utilities against the security deposit, the owner must submit to the tenant:

- Verification of past-due rent or utilities
- Verification of damages that may include but is not limited to:
 - Invoices or estimates for repairs/contracting required due to tenant damages
 - Photographic proof of damages

If the owner does not have the tenants forwarding address, email or cell phone, to send an attachment or to mail, they may mail to their former address.

If the owner and tenant do not come to an agreement, the owner must file a civil suit to settle dispute.

Notice of charges against security deposit must be provided to tenant within 30 days of the tenant move-out in accordance with Pennsylvania State Law.

E. DEFINITION OF CONTINUOUSLY ASSISTED

An applicant is continuously assisted under the 1937 Housing Act if the family is already receiving assistance under any 1937 Housing Act program when the family is admitted to the Housing Choice Voucher Program. HACE will continuously assist a family if no more than 120 days have elapsed since the family has received assistance, except as required as a reasonable accommodation for a family that includes a person with disabilities.

12. INFORMAL REVIEWS AND HEARINGS

HACE will conduct Informal Reviews and Hearings in accordance with all applicable HUD regulations contained in Section 24 of the Code of Federal Regulations; HUD Notices; any applicable federal, state, or local law governing such process; and this Administrative Plan. An Informal Review will be offered to an applicant when HACE has denied Program assistance. An Informal Hearing will be offered to a participant family when specific decisions have been made by HACE relating to individual circumstances of the family.

A. INFORMAL REVIEWS FOR APPLICANTS

1. Acceptable Reasons for Informal Reviews

Except as noted below, HACE will give an applicant an opportunity for an Informal Review of a determination by HACE to deny assistance. Any such decision will be provided promptly to the applicant in writing and delivered by First Class Mail. The decision notice will include a brief statement of the reason for the denial, the applicant's right to a review, and the procedure to request a review.

2. Unacceptable Reasons for Informal Reviews

HACE will not provide an applicant with an opportunity for an Informal Review for any of the following reasons:

- a. Discretionary administrative determinations by HACE.
- b. General policy issues or class grievances.
- c. A determination of family unit size under HACE's subsidy standards.
- d. A HACE determination not to approve an extension or suspension of a Voucher term.
- e. A HACE determination not to grant approval to lease a unit under the Program or to approve a proposed lease.
- f. A HACE determination that a unit selected by the applicant is not in compliance with HQS.
- g. A HACE determination that the unit is not in compliance with HQS because of the family size or composition.

3. Request for Informal Review

An applicant will be provided with HACE's procedure for requesting an Informal Review in the Notice of Ineligibility. The applicant must request an Informal Review by writing to the address listed in the notice. The request for an Informal Review must be received by HACE within 14 days of the date of such notice. If the applicant fails to properly submit the request within the prescribed time, they will forfeit their right to an Informal Review, and the decision to deny assistance will be final.

4. Informal Review Process

The Informal Review will be conducted by a hearing officer appointed by HACE who has neither made nor approved the decision under review or by a subordinate of such person. The process will be in accordance with the following:

- a. The applicant will be notified of the date, time, and location of the Informal Review within approximately 30 days of the receipt of the request. HACE schedules Informal Reviews each month and may be conducted by phone, in person or other suitable means approved by HACE.
 - The applicant may request, in advance, that HACE reschedule their review because of a reasonable inability to attend.
 - An applicant's failure to attend a scheduled Informal Review without advance notification to HACE will be reason for automatic denial of the request without a decision by the hearing officer on the merits of HACE's determination to deny assistance.
- b. Persons with disabilities will be afforded special considerations in the scheduling and conducting of the Informal Reviews.
- c. The applicant will have a right to examine their file prior to the review.
- d. HACE must be given the opportunity to examine, at its offices, any family documents that are directly related to the review. HACE may copy any such document at its expense. If the family does not make the document available for examination by HACE, the family may not rely on the document at the review.
- e. The applicant will have the right of representation by legal counsel at the applicant's expense. HACE must be notified in advance if the applicant intends to be represented by legal counsel.
- f. Evidence, witnesses and any information applicable to the review may be presented by either HACE or the applicant.

- g. The hearing officer will conduct the Informal Review in a manner intended to ensure proper order.
- h. A final decision will be made by the hearing officer based upon the facts and evidence presented at the Informal Review.

B. INFORMAL HEARINGS FOR PARTICIPANTS

1. Acceptable Reasons for Informal Hearings

HACE will give a participant an opportunity for an Informal Hearing for certain HACE determinations relating to individual circumstances of the participant family. Any applicable determination will be promptly provided to the participant in writing and delivered by First Class mail. The notice will include a brief explanation of the determination, the applicant's right to a hearing, and the procedure to request a hearing. HACE will offer a participant family an Informal Hearing for the following reasons:

- a. A determination of the family's annual or adjusted income, and the use of such income to compute housing assistance payments.
- b. A determination of the appropriate utility allowances (if any) for tenant-paid utilities from HACE's utility allowance schedule.
- c. A determination of the family unit size under HACE subsidy standards.
- d. A determination that a Voucher Program family is residing in a unit with a larger number of bedrooms than appropriate for the family unit size under HACE's subsidy standards or a determination to deny the family's request for an exception from the standards.
- e. A determination to terminate assistance for a participant family because of the family's action or failure to act in accordance with applicable HUD regulations or HACE policies (see 24 CFR 982.552).
- f. A determination to terminate assistance because the participant family has been absent from the assisted unit for longer than the maximum period permitted under HUD regulations or HACE policy.

2. Unacceptable Reasons for Informal Hearings

HACE will not provide a participant family with an opportunity for an Informal Hearing for any of the following reasons:

- a. Discretionary administrative determinations by HACE.
- b. General Policy issues or class grievances.

- c. Establishment of HACE's schedule of utility allowances for families in the Program.
- d. A HACE determination not to approve an extension or suspension of a Voucher term.
- e. A HACE determination not to approve a unit or lease.
- f. A HACE determination that an assisted unit is not in compliance with HQS (unless a decision to terminate assistance was made due to tenant caused HQS deficiencies).
- g. A HACE determination that the unit is not in compliance with HQS because of the family size.
- h. A determination by HACE to exercise or not to exercise any right or remedy against the owner under a HAP contract.

3. Request for Informal Hearings

A participant family will be provided with HACE's procedure for requesting an Informal Hearing in the determination notice. The participant must request an Informal Hearing by writing to the address listed in the notice. The request for an Informal Hearing must be received by HACE within 14 days of the date of the notice. If the participant fails to properly submit the request within the prescribed time, they will forfeit their right to an Informal Hearing and the determination will remain as final.

HACE will notify the family that they may first ask for an explanation of the basis of a HACE determination under B.1a, b, and c of this section. If the family does not agree with the explanation, they then may request an Informal Hearing in accordance with the Informal Hearing request procedures defined above.

4. Informal Hearing Process

The Informal Hearing will be conducted by a hearing officer appointed by HACE who has neither made nor approved the decision under review or by a subordinate of such person. The process will be in accordance with the following:

- a. The participant will be notified by mail or other suitable means, of the date, time, and location of the Informal Hearing within approximately 30 days of the receipt of request by HACE. The hearing may be conducted by phone, in person or other suitable means approved by HACE.
 - The participant may request, in advance, that HACE reschedule their hearing because of a reasonable inability to attend.

- A participant's failure to attend a scheduled Informal Hearing without advance notification to HACE will be reason for immediate denial of the request without a decision by the hearing officer on the merits of HACE's determination to terminate assistance.
- b. Persons with disabilities will be afforded special considerations in the scheduling and conducting of the Informal Hearings.
 - c. The participant will have a right to examine their file prior to the hearing.
 - d. HACE must be given the opportunity to examine, at its offices, any family documents that are directly related to the hearing. HACE may copy any such document at its expense. If the family does not make the document available for examination by HACE, the family may not rely on the document at the hearing.
 - e. The participant family will have the right of representation by legal counsel at the family's expense. HACE must be notified in advance if the family intends to be represented by legal counsel.
 - f. Evidence, witnesses and any information applicable to the hearing may be presented by either HACE or the participant family.
 - g. The hearing officer will conduct the Informal Hearing in a manner to ensure proper order.
 - h. A final decision will be made by the hearing officer based upon the facts and evidence presented at the Informal Hearing.

C. HEARING OFFICER AND CONDUCT OF INFORMAL REVIEWS/HEARINGS

1. Hearing Officer

The Hearing Officer for all HCV Program Informal Reviews and Informal Hearings will be HACE Executive Director or other member of management with appropriate administrative authority. They or a subordinate of such person will have neither made nor approved the decision under review. The Hearing Officer will be responsible for insuring that all eligible requests for reviews and hearings are scheduled within approximately 30 days of the receipt of such requests. Following each of the reviews and hearings, the Hearing Officer will be responsible for promptly providing a decision letter to the applicant or participant family in accordance with this Plan.

2. Conduct of Informal Reviews and Hearings

The Hearing Officer is authorized to regulate the conduct of hearings and reviews at their discretion. This is a non-judicial function; therefore, no formal procedure is required. It shall be the responsibility of the Hearing Officer to ensure that adequate information is presented and that the order of the hearing proceeds accordingly. The Hearing Officer always will identify the session (parties present, date, time, place) and read the initial HACE determination or decision which prompted the review or hearing. It is the responsibility of the Hearing Officer to take pertinent notes and acknowledge material and testimony needed to make a reasonable determination. The need for a tape recording and transcript of the proceedings shall be at the discretion of the Hearing Officer.

D. INFORMAL REVIEW AND HEARING DECISIONS

The Hearing Officer is responsible for issuing to the applicant or participant a written decision within a reasonable length of time following the review or hearing. The decision letter shall be sent to the family by First Class Mail. The letter will contain a statement of the decision, and the reason(s) for the decision, including any applicable HUD regulations and/or HACE policies. Factual determinations that relate to the individual circumstances of the family will be based on a preponderance of evidence presented at the review or hearing. HACE is not bound by any decision contrary to HUD regulations or requirements or otherwise contrary to federal, state, or local law.

E. RESTRICTION ON ASSISTANCE TO NON-CITIZENS

HACE will comply with the Informal Hearing provisions for the denial of assistance based on ineligible immigration status contained in 24 CFR part 5 subpart E.

13. REPAYMENT AGREEMENTS

HACE provides, in certain instances, an opportunity for a family who owes money to HACE, for overpayments of assistance resulting from unreported or misreported family information, to enter into a repayment agreement and continue to participate in the HCV Program. HACE will calculate the installment amounts and prescribe the terms of the repayment agreement.

Only one repayment agreement will be offered to families who owe HACE money. If circumstances result in additional monies owed by the family to HACE, such monies must be reimbursed in one payment, which will be due within no more than 60 days of the notice to the family by HACE. Failure by the family to meet this requirement will result in the termination of the HAP Contract.

A. MISREPORTED OR UNREPORTED INCOME

When HACE identifies cases where the family has erroneously reported their household income, or has not reported all their household income, a determination will be made as to whether the family's action or inaction appears to be deliberate and whether any Family Obligations have been violated. A repayment agreement may be offered if the family has not:

- Committed fraud or willfully misrepresented information;
- Violated any of the Family Obligations; or
- Previously breached a repayment agreement with HACE.

B. OTHER AMOUNTS OWED TO HACE

A family may owe HACE money for reasons other than overpayments as stated previously in this chapter (A). Repayment agreements for other amounts owed may be offered to families by HACE depending upon the origin of the outstanding debt and any rules governing the type of debt. The decision to offer a repayment agreement in this category will be made on an individual basis and is at the sole discretion of HACE.

C. REPAYMENT AGREEMENT POLICY

The repayment agreement will be specific, identifying the reason for the reimbursement, term of the agreement, payment frequency and due date, installment amount and other binding conditions structured by HACE. A repayment agreement must be executed by the family's head of household within 30 days of the offer by HACE; otherwise, it will be considered to be a refusal by the family to enter into the agreement. The repayment agreement policy conforms to the following:

- Each installment will be due in advance without notice to the family. Payments will be made to HACE's main office or address identified in the repayment agreement.
- A repayment agreement for a family will consist of a term of no longer than 12 months unless a longer time is approved by the Executive Director or designee.
- Any breach of the terms or conditions of a repayment agreement will result in the termination of program assistance for the family in accordance with 24 CFR 982.552 (c)(vii).
- If a family is offered a repayment agreement for monies owed HACE, and the family refuses, the entire amount will be due immediately. Failure by the family to pay HACE will be considered reason for the termination of program assistance under 24 CFR 982.552(c)(v).
- Advance notice of a termination of program assistance under this paragraph and a right to an Informal Hearing will be provided to the family prior to a discontinuation of assistance.
- If the family participates in the FSS program, HACE may reduce the amount of the family's escrow balance by the amount owed HACE.

D. REPAYMENT AGREEMENTS BY OWNERS

In some cases the owner of an assisted unit under a HCV Program HAP Contract may have received excess assistance payments through no fault of their own. When overpayments cannot be deducted from the owner's monthly HAP check, an agreement may be offered by HACE for reimbursement. Such agreement will be for no longer than 12 months and will include specific terms and conditions structured at the discretion of HACE and agreed to by the owner.

E. PROSECUTION FOR FRAUD

If HACE determines that the family (or owner, if applicable) has committed fraud after a repayment agreement has been executed, HACE may terminate assistance and may seek prosecution through the courts. In all cases involving fraud, HACE has the right to prosecute in accordance with applicable laws.

14. PROGRAM INTEGRITY AND PERFORMANCE

A. PROGRAM MONITORING

Monthly reports will be maintained to monitor the waiting list and outstanding Vouchers to effectively manage the leasing schedule and to provide HACE with program demographics. A HAP contract register will be maintained and regularly reviewed to monitor the monthly Housing Assistance Payments.

B. ETHICS

In accordance with federal regulations, HACE nor any of its contractors or subcontractors may enter into any contract or arrangement in connection with the tenant-based programs in which any of the following classes of persons has any interest, direct or indirect, during his or her tenure with HACE or for 1 year thereafter:

1. Any present or former member or officer of the Housing Authority (except a participant commissioner).
2. Any employee of the Housing Authority or any contractor, subcontractor or agent of the Housing Authority who formulates policy or who influences decisions with respect to the programs.
3. Any public official, member of a governing body, or State or local legislator who exercises functions or responsibilities with respect to HACE's programs; or
4. Any member of the Congress of the United States.

Any member of the classes described above must disclose their interest or prospective interest to the Housing Authority and HUD.

The Conflict of Interest prohibition under this section may be waived by the HUD Field Office upon the request of HACE for good cause.

No Commissioner or HACE employee shall solicit or receive any gift or consideration.

Violations of these requirements will result in disciplinary action as outlined in the HACE's Employee Handbook and be determined by action of the Board of Commissioners.

C. QUALITY CONTROL

HACE will conduct Quality Control reviews in five key management areas relating to specific performance indicators of the Section Eight Management Assessment Program ("SEMAP"). The reviews will be completed by HACE Executive Director, a management designee, or an independent contractor in accordance with 24 CFR Part 985 to determine performance for the following:

1. Selection from the Waiting List
2. Reasonable Rent
3. Determination of Adjusted Income
4. HQS Quality Control Inspections
5. HQS Enforcement

The Quality Control Samples will be drawn in an unbiased manner and reviewed by the appropriate management individual as defined above for the purpose of determining if the work documented in the files conforms to program requirements. The minimum size of the sample will be as follows:

UNIVERSE	MINIMUM NUMBER IN SAMPLE
50 or less	5
51-600	5 plus 1 for each 50 (or part of 50) over 50
601-2000	16 plus 1 for each 100 (or part of 100) over 600
Over 2000	30 plus 1 for each 200 (or part of 200) over 2000

D. FINANCIAL REPORTING

All financial reporting will be in accordance with applicable HUD regulations and Generally Accepted Accounting Principles.

E. EXPENDITURE THRESHOLD

The threshold amount for expenditures that may be made from the Operating Reserve for other housing purposes without prior approval of the Board is set at \$1000.

**Housing Authority of the City of Erie
Public Housing Transfer Policy**

The Department of Housing & Urban Development (HUD) allows housing authorities to establish transfer policies in any manner that is reasonable and that does not conflict with any other HUD established occupancy regulations or affirmative housing goals. The housing authority should establish transfer policies that will be consistently applied.

The transferring of families is a very costly procedure, both to the housing authority and to the families. However, it is the policy of HACE to permit a resident to transfer within or between housing developments; when it is necessary to comply with occupancy standards; or when it will help accomplish the Affirmative Housing goals of HACE. The transfer policy will be carried out in a manner that does not violate fair housing.

In accordance with the Admissions & Occupancy Policy of the Housing Authority of the City of Erie (HACE), HACE shall maintain a transfer list to determine priority and precedence and indicate reason for the transfer. HACE will approve transfers for the following reasons:

- Priority 1: Imminent threat(s) as determined by HACE
- Priority 2: To permit modernization of the unit and/or building
- Priority 3: There is a verified need for a Reasonable Accommodation or a verified medical need for a different unit
- Priority 4: To correct any occupancy standards
- Priority 5: To avoid concentrations of the most economically and socially deprived families

UNIT TRANSFER POLICIES

HACE will accept requests for transfer based on the following:

1. There is a need for a unit transfer because of a change in household size and/or composition.
2. There is a need for a unit transfer based on the verified need for an accessible unit.
3. There is a verified need for a reasonable accommodation or a verified medical need for a different unit.
4. There is a need for a unit transfer of a household that does not require the accessibility features of a unit in which they are living.
5. The resident has requested and qualifies for a VAWA Emergency Transfer.

The HACE will not permit transfers to a scattered site unless it is deemed that the household is able to afford the utilities separate from the rent.

Existing residents must complete a Unit Transfer Request. The Unit Transfer Request must be completed and signed by the Head-of-Household (HOH) and all adult household members. All transfer requests will be reviewed by the Deputy Director who will notify the household in writing whether they have been determined eligible for a transfer. Those who are determined ineligible will be informed that they can reapply in 12 months.

Special consideration is given when the unit transfer is requested because:

- There is a verified need for a reasonable accommodation or a verified medical need for a different unit.
- There is a need for a unit transfer of a household that does not require the accessibility features of a unit in which they are living to accommodate a disabled resident/applicant on the waiting list.
- The resident has requested and qualifies for a VAWA emergency transfer.
- There is a change in household size that makes the current unit too large or too small for the family based on HACE's occupancy standards.

Except under specific circumstances, a household's eligibility for a unit transfer will be granted only if:

- The household has not given notice to move
- The household is not pending eviction or being evicted
- The household is current for all outstanding charges
- The household has not entered into a repayment agreement for failing to fully and accurately report income or household composition
- The household has no record of any lease violations in the last 12 months
- The household complies with lease provisions regarding decent safe and sanitary conditions of the current unit
- The household has been a resident in good standing with the housing authority for 12 months or more

Emergency transfers under the VAWA are exempt from the above requirements.

SECURITY DEPOSITS, PET DEPOSITS & UNIT TRANSFERS

When a resident, transfers to a new unit with all other household members, HACE will transfer the existing security deposit and pet deposit (if applicable) to the new unit. The resident will receive a bill for fees or damages owed. This bill must be paid within 30 days unless an alternative payment plan has been made with the Manager.

VAWA EMERGENCY TRANSFER

In some cases, families that qualify for a VAWA Emergency Transfer receive preference over other transfers. Please contact property management staff for additional information.

OFFERING AN APARTMENT

When a unit becomes available and eligibility is determined, available units will be offered using one or more of the following methods:

- In writing
- Over the phone
- By email

If HACE is unable to contact the head-of-household (HOH) within five (5) business days, the offer will be cancelled, and the apartment will be offered to the next person on the transfer list. The household will remain on the list and offered the next available unit. Only two attempts to reach the resident will be made before they will be removed from the transfer list.

OFFERING OF ACCESSIBLE UNITS

Units that have been made accessible in accordance with the Universal Federal Accessibility Standards (UFAS) or the Americans with Disabilities Act (ADA) Guidelines will be offered to residents and applicants with disabled members first. In some cases, HACE may implement marketing efforts to ensure that disabled households occupy accessible units.

After move-in, if the members of the household who required the special features of the accessible unit no longer reside in the unit, and where the lease permits, HACE will require the remaining members of the household to move to a unit without accessibility features when such a unit of the appropriate size becomes available.

If there is no household on the waiting list that has requested an accessible unit, the unit will then be offered to the next household based on the selection order.

Before a resident or applicant can accept that accessible unit, all adult members of the household must sign an agreement that includes a requirement to move, at the household's expense, to the first available non-accessible unit that meets the household's occupancy requirements as described in this plan. The resident household will not be required to move if:

1. No unit that meets the household's occupancy requirements is available
2. There is no household on the waiting list requesting an accessible unit

In either of these cases above, the household will have a maximum of thirty (30) calendar days to complete the move. If the resident fails to move in thirty (30) calendar days, assistance will be terminated, and the household will be required to pay flat rent.

RIGHT TO REFUSAL

Each household will be offered the opportunity to accept an offered apartment two (2) times. If a resident does not wish to accept an offered apartment, they have the right to refuse the offer.

Residents must notify HACE of their intent to refuse the unit offer by using one or more of the following methods:

- In writing (delivered by fax, mail or other means)
- By email
- Over the phone

Note: If the refusal is made over the phone, contact must be made with a member of the management staff. Leaving a message is not adequate.

The first time a resident refuses a unit, the unit will be offered to the next qualified household based on the selection order described in this policy. The resident will retain the same place on the waiting list. The second time a resident refuses an offered unit, the household will be removed from the transfer list.

Right to Refusal Policies will be modified in three cases:

1. If a disabled resident is at the top of the waiting list, they will be offered units as they become available regardless of whether they include accessible features. A disabled household has the right to refuse an unlimited number of non-accessible units or units that do not meet specific accessibility requirements.
2. If an applicant or resident household with no disabled members is at the top of the waiting list, and there are no disabled households on the waiting list, that household may be offered an accessible unit. A household with no disabled household members has the right to refuse an unlimited number of accessible units or units that do not meet their needs.
3. The resident qualifies and has been approved for a VAWA Emergency Transfer and the person who is a victim of a VAWA crime or the person who is affiliated with the person who is a victim of a VAWA crime does not consider the unit "safe".

TIMEFRAME FOR TAKING POSSESSION OF A UNIT

The household must agree to take possession of a unit in no more than thirty (30) calendar days unless HACE provides written exception to this policy.

If the household does not complete appropriate paperwork and does not take possession of the unit within thirty (30) days from accepting the offer, the applicant will be subsequently rejected and removed from the transfer list. (Extenuating circumstances related to verified medical situations will be considered).

OVER/UNDER-HOUSED TRANSFERS

Transfers of residents who require a smaller or larger unit will be made in ranking order by bedroom size required, number of household members and transfer application date. HACE will transfer over/under-housed families by offering every fifteenth vacant unit to an approved over or under housed family. HUD expects housing authorities to maintain a 98% occupancy rate. Therefore, HACE reserves the right to refuse transfers when the occupancy rate in a development is below 98%.

HACE does not discriminate on the basis of disability status in the admission or access to, or treatment or employment in, its federally assisted programs and activities.

The person named below has been designated to coordinate compliance with the nondiscrimination requirements contained in the Department of Housing and Urban Development's regulations implementing Section 504 (24 CFR, part 8 dated June 2, 1988).

Dusti Dennis
606 Holland Street
Erie, PA 16501
814-452-2425 ext. 2231
TTY: 814-455-1797

Request for Documents Policy

This policy has been put in place to establish the process of document/information requests from Residents outside of normal certifications.

At times it is necessary to request further documentation from a Resident to correct an error, determine if an Interim is necessary, or follow up with a Zero Income resident.

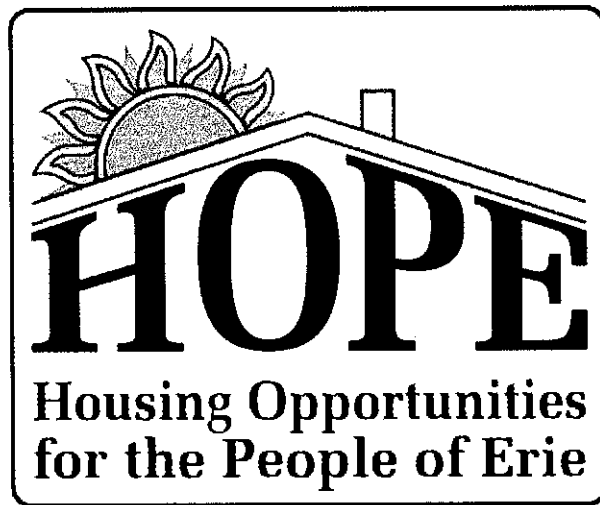
The process for this will be as follows:

1. A letter will be delivered or mailed to the Resident with an explanation of what documents/information must be provided to the office. The Resident will be given 10 calendar days to respond and provide what is requested.
2. If the office does not receive the requested information within the 10 day time frame originally given, the Resident will receive a 2nd letter advising them that their subsidy will be terminated in another 10 days if the information is not received by the office.
3. If the Resident has still not responded, the Household will either go to flat rent in the case of Public Housing or their subsidy will be terminated if residing in HUD Multi family housing. This change will occur on the first of the following month after the 10 days have passed.

If the Resident provides the information after the deadline, they will be placed back on subsidy on the 1st day of the month following the receipt of all the information.

Reasonable accommodations can be requested and HACE will take into account situations where the Resident contacts the office to let them know that the information is coming, but it is in the hands of a third party.

Housing Authority of the City of Erie



EIV POLICY AND PROCEDURE MANUAL

Updated 5/20/21

PURPOSE:

The purpose of this policy is to provide instruction and information on the acceptable use, disposition, and storage of data obtained through the Enterprise Income Verification (EIV) System. The purpose of the EIV system is to streamline the verification process and help minimize the need for third-party verification. This policy covers EIV use for Public Housing (PH), Housing Choice Voucher (HCV) and HUD Multi-family housing(MF).

OVERVIEW:

The EIV System is a web-based application, which provides Public Housing Agencies (PHAs) with employment, wage, unemployment compensation and social security benefit information for residents who participate in the public housing and various section 8 and multi-family programs PHAs have been required to use the EIV system in its entirety since January 31, 2010. The features of the system are used to:

1. Verify resident employment and income information during interim and mandatory reexaminations of family composition and income in accordance with 24 CFR 5.236, and other HUD administrative guidance; and
2. Reduce administrative and subsidy payment errors in accordance with HUD administrative guidance.

The EIV system will be used to identify the following:

1. To determine if applicants are currently receiving rental assistance through another public housing, section 8 or multi-family housing program,
2. To verify quarterly wage information, unemployment compensation, and social security benefits,
3. To determine if participants have started new employment,
4. To identify residents who may be receiving multiple subsidies,
5. To identify deceased household members,

Standard third-party verifications will be used when necessary, to verify income if the EIV system is not available or if no information is available in the EIV system.

HACE will not suspend, terminate, reduce, make a final denial of rental assistance, or take any other adverse action based solely on the data in EIV. If the information in EIV does not agree with the amount that the resident reports they receive, or when the resident disputes the EIV data, management will request the appropriate third-party verification.

PRIVACY ACT COMPLIANCE:

Whenever HACE obtains EIV information the following is enforced:

1. The income data is only used for verification of resident income to determine the level of assistance that they are entitled to receive.
2. Information is not disclosed in any way that would violate the privacy of the individuals represented in the system.
3. The resident is notified of the following:
 - a. HUD and/or HACE's authorization and purpose for collecting the information,

- b. The uses that may be made of the data collected, and
 - c. The consequences to the individual for failing to provide the information.
4. Upon request in writing, the resident is provided access to records pertaining to them and an opportunity to correct or challenge the contents of the records.

The data provided via the EIV system must be protected to ensure that it is only used for official purposes and not disclosed in any way that would violate the privacy of the individuals represented in the system data.

Under the Privacy Act, residents have the right to challenge the accuracy of information maintained by the Federal Government. If a resident disputes the employment and/or income information, the resident must contact the employer directly. If the information is incorrect, the employer must correct the information and resubmit it to the state, Internal Revenue Service (IRS), and the Department of Health and Human Services (HHS). If the resident disputes the Social Security (SS) information, the resident must contact the SSA (Social Security Administration). If the SS information is incorrect, the SSA must correct the information and update its database. If the dispute is with unemployment compensation information, the Resident will need to contact the local Unemployment Office.

The EIV Coordinator(s), or designated staff, must assure that a copy of either:

- Form HUD-9886 – Authorization for the Release of Information/Privacy Act Notice for Public Housing and Housing Choice Voucher residents, or
- HUD Form 9887 and 9887(a) Document Package for Applicant's/Resident's Consent to the Release of Information, has been signed by each member of the household age 18 years old or older and is in the applicant/resident file. By signing this form, the applicant/resident authorizes HUD and the PHA to obtain and verify income and unemployment compensation information from various sources including current and former employers, State agencies, SSA and HHS.

Civil Penalties Associated with the Privacy Act

1. A resident may take legal measures for the following agency actions:
 - a. Refusal to grant access to a record.
 - b. Refusal to amend or correct a record.
 - c. Failure to maintain a record with accuracy, relevancy, timeliness, or completeness.
 - d. Failure to comply with any other provision of the Privacy Act, where there is an adverse effect on the resident.
2. If found liable, the Agent will be required to pay the resident:
 - a. Damages sustained because of the agency's actions.
 - b. The costs of the lawsuit, including reasonable attorney's fees.

Criminal Penalties Associated with the Privacy Act

A HACE employee can be found guilty of a misdemeanor or a felony if that employee knowingly and willfully:

1. Discloses a resident's record to an unauthorized party.
2. Fraudulently represents themselves to obtain another individual's record.

SECURITY:

EIV DATA WILL BE SAFEGUARDED AT ALL TIMES:

1. Computer Monitors:
 - a. Data displays are only active when the information is in use and only when no unauthorized person is within viewing distance.
 - b. When exiting the office, employees will either lock their screen or close and lock the door to the office.
 - c. Computers will time out and automatically lock.
2. Printed and Faxed Reports:
 - a. Will be promptly removed from printer trays.
 - b. Will not be left unattended.
 - c. Will not be left within viewing distance of unauthorized personnel or visitors.
 - d. Will be properly filed in a secure filing cabinet.
3. Emailed Reports:
 - a. If necessary to email information, it will be done using a secured email technique.
 - b. Once the information is printed, it will be deleted from the email.
4. Electronic Storage:
 - a. Reports will not be scanned and stored electronically. EIV data which is copied onto any electronic media will be deleted immediately upon use.
5. Filing: EIV reports will be kept in locked cabinets and may be filed:
 - a. In an EIV consolidated file (Master File).
 - b. In the resident file.
6. Discussing EIV information:
 - a. EIV information will only be discussed with others on a "need to know" basis.
 - b. EIV information is protected at the individual level. Specific information pertaining to one family member will not be discussed in the presence of other family members or individuals without written permission of the individual.
7. Disposal: EIV data will be disposed of by either shredding or burning.

EIV RULES OF BEHAVIOR:

HUD is actively involved in implementing and maintaining departmental policies and procedures to keep its systems secure from unauthorized access and inappropriate use. In compliance with various security-related federal laws and regulations, HUD created the Rules of Behavior (ROB) for the EIV system.

The purpose of the rules is to safeguard HUD's valuable information resources. All EIV Coordinators and Users must adhere to the Rules of Behavior. The rules clearly spell out the responsibilities of, and expectations for, all individuals with access to the EIV system.

Should HUD determine noncompliance with these rules, there will be discipline through sanctions which will be commensurate with the level of infraction. This may include removal of system access for a specific period of time or termination depending on the severity of the violation.

The system user identification and password issued to you are your means to access EIV. Your "User ID" is NOT to be used by anyone other than yourself as this is expressly prohibited.

The EIV system is programmed to log every time anyone accesses resident data. This is part of the effort to protect the data and provide traceability should a questionable event occur. Before accessing the EIV System, all users must acknowledge and accept that they understand these EIV requirements, each time that they sign on.

REPORTING IMPROPER DISCLOSURES:

Recognition, reporting, and disciplinary action in response to security violations are crucial to successfully maintaining the security and privacy of the EIV system. These security violations may include the disclosure of private data as well as attempts to access unauthorized data and the sharing of User IDs and passwords. Upon the discovery of a possible improper disclosure of EIV information or another security violation by a PHA employee or any other person, the individual making the observation or receiving the information should contact the PHA EIV Coordinator. The EIV Coordinator or designated staff should document all improper disclosures in writing providing details including who was involved, what was disclosed, and how, where and when it occurred.

The following contacts should be made:

- The EIV Coordinator should contact and provide the Executive Director or the designee with the written documentation;
- The Executive Director or the designee should provide the HUD Field Office Public Housing Director with the written documentation, and;
- The HUD Field Office Public Housing Director upon receipt of the written documentation will make a determination regarding the referral and the provision of the written documentation to the HUD Headquarters EIV Coordinator and/or EIV Security Officer for further review and follow-up action.

EIV CERTIFICATION:

In order to gain access to the EIV system, every user must apply for access. Every user must have an active WASS User ID. HUD encourages the use of the electronic features to submit and to approve both EIV Coordinator and user requests to respective authorizers. Owner/agents taking over new properties have 90 days to obtain access to EIV.

EIV Coordinators must recertify annually for continued access to EIV. EIV Users must recertify every six (6) months.

The EIV Security Awareness Training Questionnaire must be completed by all new EIV user applicants (Coordinators and Users) applying for initial access. All users will have annual security awareness training.

The following should be in the EIV Master File as well as at the offices of the properties:

- Copy of the User Access Authorization Form (UAAF), Rules of Behavior and User Agreement,
- Copy of the Coordinator Access Authorization Form (CAAF),
- Owner permission for Coordinator(s),
- Security Questionnaire, and
- Cyber Awareness Training Certificate

USE OF REPORTS:

The Housing Authority of the City of Erie must use the:

- EIV Income Report as a third-party source to verify a resident's employment and income during mandatory recertifications (annual, interim and historical adjustments for PH) of family composition and income, and
- Other EIV income reports (Income Discrepancy Report, New Hires Report and No Income Report) to identify issues or discrepancies which may impact a family's assistance, and
- EIV Verification Reports (Existing Resident Search, Multiple Subsidy Report, Identity Verification Reports, and Deceased Residents Report) that further assist in reducing subsidy payment errors.

HUD has provided clear instruction about timing for running EIV reports.

- Existing Tenant Search – prior to move in
- Former Tenant Search and Debts Owed to PHAs – prior to move in
- Failed Pre-Screening/Failed Verification – monthly
- Deceased Resident – monthly
- New Hires Report – monthly
- Multiple Subsidy Report – monthly
- Income Report – within 90 days after move-in
- Income Report/Income Discrepancy Report or Income Verification Tool – at annual and all interim certifications and as indicated in the property's EIV policy

- No Income Report – at least quarterly and as indicated in the property’s EIV policy

At a minimum, HACE will run the EIV Reports on the following schedule but may run them more frequently.

Report	Program	Monthly	Quarterly: (Jan/April/July/Oct)	Other
Former Tenant Search and Debts Owed to PHAs	PH/HCV	X		Before Move-In
Existing Tenant Search	All	X		Before Move-In
Income Report Income Discrepancy Report Income Validation Tool	All MF PH/HCV	X		Within 90 days after move-in and at annual and interim re-exams
Failed Pre-Screening/Failed Verification	All	X		
Deceased Resident	All	X		
Immigration Report	PH/HCV	X		
New Hires Report	All	X		
Multiple Subsidy Report	All	X		
No Income Report	All		X	

RESIDENT REPAYMENT POLICY:

- The resident and PHA must both agree on the terms of the repayment agreement. The resident may wish to consult with HUD’s Housing Counseling Agency in their area to assist them in working with the PHA to reach agreeable terms for the repayment agreement. See the Housing Counseling Agency website for a listing of agencies for each state at: <http://www.hud.gov/offices/hsg/sfh/hcc/hcs.cfm>.
- Monthly Payment: The resident’s monthly payment must be what the resident can afford to pay based on the family’s income. The monthly payment plus the amount of the resident’s total resident payment (TTP) at the time the repayment agreement is executed should not exceed 40 percent of the family’s monthly adjusted income.
- O/As must not apply a resident’s monthly rent payment towards the repayment amount owed if that would result in an accumulation of late rent payments. The monthly payment due on the repayment agreement is in addition to the resident’s monthly rent payment.
- The repayment time period will be determined by dividing the total amount that the resident agrees to pay by the agreed upon monthly amount.

Repayment Agreements will:

1. Include the total retroactive rent amount owed, the amount of lump sum paid at time of execution of the agreement, if applicable, and the monthly payment amount

2. Reference the paragraphs in the lease whereby the resident is in non-compliance and may be subject to termination of their lease.
3. Contain a clause whereby the terms of the agreement will be renegotiated if there is a decrease or increase in the family's income of \$200 or more per month.
4. Include a statement that the monthly retroactive rent repayment amount is in addition to the family's monthly rent payment and is payable to the PHA.
5. Late and missed payments constitute default of the repayment agreement and may result in termination of assistance and/or tenancy.
6. Be signed and dated by the resident and the Manager.

DISPOSITION of FUNDS RECEIVED from RESIDENT – POLICY & PROCEDURE (HCV and Multi-family only):

- PHAs will reimburse funds collected from the resident to HUD by providing the Contract Administrator with a copy of the resident payment receipt each month.
- The PHA will complete corrections to prior certification(s) affected by the income change and transmit the applicable certification(s) to the Contract Administrator.
- As the resident makes payments per the repayment agreement, the O/A will enter them as negative amounts on the voucher as OARQ Miscellaneous Accounting Requests.
- HACE may retain a portion of the repayments they actually collect from the residents who have improperly reported their income at the time of certification or recertification to help defray the cost of pursuing these cases that is the lesser of: their actual costs or 20% of the amount received from the resident.
- Amounts retained by O/As will be deposited into the project's operating account to offset the expenses incurred for these cases.
- HACE will keep records of the receipt and disbursement of all amounts collected from the resident for audit purposes. The O/A will record: (a) Date and amount(s) received from the resident; (b) Expenses incurred; (c) Amount(s) retained; (d) Voucher date(s) and amount(s) of reimbursement made to HUD/CA.

DOCUMENTATION TO BE MAINTAINED:

The following documents related to EIV access, authorizations or security will be maintained at each property and available for auditing purposes:

- EIV Coordinator Access Authorization Form(s) Initial Authorization and Annual Recertification (signed original copy or current copy)
- EIV User Access Authorization Form(s) Initial Authorization and Bi-Annual Recertification (signed original copy or current copy)
- EIV Owner Approval letter(s)
- Documentation of EIV Security Training which includes but is not limited to the successful completion (90% or higher) of the online EIV Security Awareness Training
- Documentation of Annual EIV Security Training for Owner & Agent Staff who do not have access to EIV but who use EIV reports to perform their job function Documentation of Training will be maintained and made available for compliance review.

- Signed EIV “Rules of Behavior” (ROB) for non-users of the EIV system who do not have access to the EIV system but who view or use EIV data/reports provided by authorized EIV Coordinators or EIV Users in order to perform their job functions, will adhere to the EIV ROB. The ROB must be signed and kept on file.

RECORD KEEPING AND FILE MAINTENANCE:

1. The Income Report, No Income Report, and Summary Report(s) showing Identity Verification Status as “Verified” and the Income Discrepancy Report(s) and supporting documentation will be retained in the resident file for the term of tenancy plus three years.
2. Any resident provided documentation, or other third-party verification of income, received to supplement the SSA or NDNH data will be retained in the resident file for the term of tenancy plus three years.
3. The Existing Resident Search Report and supporting documentation will be retained in the applicant file:
 - If applicant is not admitted, the application and search results will be retained for three years.
 - If applicant is admitted, the application and search results will be retained in the resident file for the term of tenancy plus three years.
4. The master files for the New Hires Report, Identity Verification Reports, Multiple Subsidy Report, Summary Report, No Income Report and Deceased Residents Report will be securely retained in a master binder for three years.

Once the retention period has expired, the EIV data will be disposed of in a manner that will prevent any unauthorized access to personal information, e.g., shredded or burned.

MEMO

December 17, 2020

TO: Michael R. Fraley, Executive Director

FROM: Dusti Dennis, Deputy Director

SUBJECT: Board Recommendation
COVID-19 Statutory and Regulatory Waivers & Alternative Requirements for the
Public Housing & Housing Choice Voucher Programs, Revision 2

On April 10, 2020, the Department of Housing & Urban Development (HUD), issued Notice PIH 2020-05 pursuant to the authority provided under the Coronavirus Aid, Relief and Economic Security (CARES) Act, waiving and establishing alternative requirements for numerous statutory and regulatory requirements for the Public Housing and Housing Choice Voucher programs. On November 30, 2020 HUD published Revision 2 which restates the waiver and alternative requirements included previously in Notice PIH 2020-13, carries forward information on previously specified HUD actions, adds new waivers and alternative requirements, and extends the period of availability of certain waivers, such as those related to Income Verification and Annual Examinations, until June 30, 2021.

These waivers are only temporary and expire at the dates provided in the notice.

The Housing Authority of the City of Erie adopted the following waivers at the regularly scheduled Board Meeting on April 20, 2020 and is again presenting these waivers to the HACE Board to inform the Board of the extension dates and adopt three additional waivers to its operations during the COVID 19 pandemic.

PH and HCV-3: Family Income and Composition: Annual Examination – Income Verification Requirements

HUD is waiving the requirements to use the income hierarchy described by PIH Notice 2018-18 and will allow PHAs to forgo third-party income verification requirements for annual reexaminations, including the use of EIV (Enterprise Income Verification). During the allowable period of availability, the PHAs may consider self-certification as the highest form of income verification to process annual reexaminations.

The period of availability to conduct annual reexaminations using these modified verification requirements ends on July 31, 2020.

Update: The period of availability has been extended to June 30, 2021.

PH and HCV-4: Family Income and Composition: Interim Examinations

HUD is waiving the requirements to use the income verification hierarchy as described by PIH Notice 2018-18. HUD will allow PHAs to forgo third-party income verification requirements for interim reexaminations, including the required use of EIV. During the allowable period of eligibility, PHAs may consider self-certification as the highest form of income verification to process interim reexaminations.

The period of availability ends on July 31, 2020.

Update: *The period of availability has been extended to June 30, 2021.*

PH and HCV-5: Enterprise Income Verification (EIV) Monitoring

PIH Notice 2018-18 specifies the required monitoring of EIV reports. HUD is waiving the mandatory EIV monitoring requirements.

The period of availability ends on July 31, 2020

Update: *The period of availability has been extended to June 30, 2021.*

HQS-1: Initial Inspection Requirements

Section 8 (o)(8)(A)(i) requires that the PHA must inspect the unit before any assistance payment is made to determine whether the unit meets HQS. Section 8(o)(8)(C) requires the PHA to conduct the initial inspection within certain time frames after receiving the RFTA (Request for Tenancy Approval). Section 982.305 provides that the PHA may not approve the assisted tenancy or execute a HAP contract until the unit has been inspected by the PHA and passes HQS. HUD is waiving these requirements and providing an alternative requirement. In order to place the unit under HAP contract and commence making payments, the PHA may rely on the owner's certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist in the unit. At minimum the PHA must require this owner certification. The PHA is required to conduct an HQS inspection on the unit as soon as reasonably possible but no later than October 31, 2020.

The period of availability for PHAs to accept owner's self-certification for an initial inspection ends on July 31, 2020. The period of availability for the PHA to inspect a unit that was placed under HAP contract based on the owner's self-certification ends on October 31, 2020.

Update: *The period of availability has been extended to June 30, 2021. For any unit for which a PHA accepted an owner's self-certification, the PHA must conduct an HQS inspection as soon as reasonably possible but no later than the 1-year anniversary of the date of the owner's certification.*

HQS-3: Initial Inspection: Non-Life-Threatening Deficiencies (NLT) Option

Section 8(o)(8)(A)(ii) provides the PHA with the option to choose to approve an assisted tenancy, execute the HAP Contract, and begin making housing assistance payments on a unit that fails the initial HQS inspection, provided the unit's failure to meet HQS is the result only of NLT conditions. The statute further requires that the PHA must withhold housing assistance payments from the owner if the NLT conditions are not corrected within 30 days.

HUD is waiving the requirement that the PHA must withhold the payment if the NLT repairs are not made in 30 days. Instead, the PHA may provide an extension of up to an additional 30 days to the owner to make the NLT repairs and continue to make payments to the owner during the period of that maximum 30-day extension.

The period of availability for the PHAs to approve an extension of up to an additional 30 days ends on July 31, 2020. The extension to make the NLT repairs may extend beyond July 31, 2020, depending on the date the PHA approved the extension.

Update: *The period of availability has been extended to June 30, 2021. The extension to make the NLT repairs may extend beyond June 30, 2021, depending on the date the PHA approved the extension. For example, if the PHA approved the extension on June 15, 2021, the maximum extension provided to the owner would be July 15, 2021.*

HQS-6: HQS Interim Inspection

The statute requires that upon notification to the PHA by a family or government official that the assisted unit does not comply with the HQS, the PHA must inspect the unit within 24 hours of when the PHA received the notification if the condition is life-threatening. 24 CFR 982.405(g) provides that if the reported condition is not life-threatening, the PHA must inspect the unit within 15 days. The regulation further provides that in the event of extraordinary circumstances HUD may waive the 24-hour or the 15-day inspection requirement until such time as an inspection is feasible.

HUD is waiving these requirements and establishing an alternative for both tenant-based and PBV units. If the reported deficiency is life-threatening, the PHA must notify the owner of the reported life-threatening deficiency and that the owner must either correct the life-threatening deficiency within 24 hours of the PHA notification or provide documentation that the reported deficiency does not exist. HACE will require the owner to submit a photo documenting that the repair has been made.

The period of availability ends on July 31, 2020. After July 31, 2020, the PHA must conduct the HQS inspection in accordance with the applicable time periods upon notification by a family or government official that the assisted unit does not comply.

Update: *The period of availability has been extended to June 30, 2021. After June 30, 2021, the PHA must conduct the HQS inspection in accordance with the applicable time periods upon notification by a family or government official that the assisted unit does not comply with the HQS.*

HQS-7: PBV Turnover Unit Inspections

The regulation requires that before providing assistance to a new family in a PBV contract unit, the PHA must inspect the unit. HUD is waiving this regulatory requirement and providing as an alternative requirement the PHA may rely on the owner's certification that the owner has no reasonable basis to have knowledge that life threatening conditions exist in the unit or units in question to allow a new family to occupy the vacated PBV unit.

The period of availability to fill a turnover PBV unit without conducting an HQS inspection ends on July 31, 2020.

Update: *The period of availability has been extended to June 30, 2021. For any unit for which a PHA accepted an owner's self-certification, the PHA must conduct an HQS inspection as soon as reasonably possible but no later than the 1-year anniversary of the date of the owner's certification.*

HCV-2: Information When Family is Selected – PHA Oral Briefing

The regulation requires when the PHA selects a family to participate in either the HCV or PBV program, the PHA must give the family an oral briefing. HUD is waiving this requirement and as an alternative requirement allowing the PHA to conduct the briefing by other means such as a webcast, video call, or expanded information packet.

The period of availability ends on July 31, 2020.

Update: *The period of availability has been extended to June 30, 2021.*

HCV-6: Automatic Termination of HAP Contract

When an HCV family's income increases to the extent that the housing assistance payment is reduced to \$0, PHAs are required by this regulation to automatically terminate HAP contracts 180 days after the last housing assistance payment to the owner. HUD is waiving this requirement. As an alternative requirement, the PHA, upon written notice to the owner and family, may extend the period of time following the last payment to the owner that triggers the automatic termination of the HAP contract. The extension beyond the normally applicable 180 days is determined by the PHA but may not extend beyond December 31, 2020.

The period of availability for the extension ends December 31, 2020.

Update: *The period of availability has been extended to June 30, 2021. The PHA may not extend the HAP contract beyond June 30, 2021.*

PH-1: Fiscal Closeout of Capital Grant Funds

Section 905.322(b) establishes deadlines for the submission of an Actual Development Cost Certificate Development Cost Certificate (ADCC) and an Actual Modernization Cost Certificate (AMCC) (two financial reporting documents required to close out Capital Fund grants). Specifically, the ADCC must be submitted 12 months from the date of completion or HUD termination of a development activity, and the AMCC must be submitted not later than 12 months from the activity's expenditure deadline. HUD is waiving this requirement and extending the deadlines for an ADCC or AMCC that fell between March 1, 2020 and September 30, 2020, by 6 months.

Applies to ADCC and AMCC forms due between March 1 and September 30, 2020.

Update: *For ADCC and AMCC forms due between March 1 and September 30, 2020 the deadline for submission is extended by 6 months.*

PH-5: Community Service and Self-Sufficiency Requirement (CSSR)

The statute and regulations require that each adult resident of public housing except for any family member that is exempt, must contribute 8 hours per month of community service or participate in an economic self-sufficiency program or a combination of both. HUD is waiving this requirement and is alternatively suspending the community service and self-sufficiency requirement. If the PHA adopts this waiver, tenants will not be subject to this requirement until the family's next annual reexamination.

The period of availability ends on March 31, 2021.

Update: *The period of availability has been extended to June 30, 2021.*

PH-10: Tenant Notifications for Changes to Project Rules and Regulations

PHAs are required to provide 30-day notice to impacted families for changes to policies, rules and special charges to families. HUD is waiving the requirement to provide such advance notice, except advance notice must be provided for any changes related to tenant charges. Although HUD is waiving the advanced notice, PHAs must still provide adequate notification to impacted families within 30 days of making such changes.

The period of availability ends on July 31, 2020.

Update: *The period of availability has been extended to June 30, 2021.*

In addition to the above waivers adopted by the HACE board on April 10, 2020, the Housing Authority of the City of Erie is proposing to add three additional waivers for the Boards' approval:

HQS-9: HQS Quality Control Inspections

The regulations require PHAs to conduct supervisory quality control inspections of a sampling of units under contract. HUD is waiving this regulatory requirement.

The period of availability ends on June 30, 2021.

PH-13: Over-Income Limit: Termination Requirement

For public housing families whose income has exceeded the over-income limit for the locality (120 percent of the area median income (AMI) or as established by HUD in the Implementation Notice at 83 FR 35490) for two consecutive years, a PHA must terminate the family's tenancy within 6 months of the third income determination or charge the family a monthly rent equal to the greater of: (1) the applicable Fair Market Rent (FMR); or (2) the amount of monthly subsidy for the unit, including amounts from the operating and capital fund (alternative rent). HOTMA requires HUD to determine the alternative rent options for families that remain in public housing

through formal rulemaking. However, HUD has not published a final rule that implements this requirement, and PHAs are therefore not yet able to calculate alternative rents.

HUD is waiving the requirement that a family whose income has exceeded the over-income limit for the locality for two consecutive years be terminated within 6 months of the third income determination.

The period of availability ends on June 30, 2021.

PH-14: Annual Choice of Rent

Once a year, PHAs must give families the option of choosing between a flat rent and an income-based rent. A family may not be offered this choice more than once per year with the exception that a family may switch from a flat rent to an income-based rent because of financial hardship. Thus, under current rules families who switch from a flat rent to an income-based rent because of financial hardship may not switch back to a flat rent prior to their next annual recertification. Families experiencing a financial hardship due to the COVID-19 pandemic because of a change in circumstances, for example a loss of employment, may no longer be experiencing such hardship and want to continue paying a flat rent. HUD is waiving the requirement that a family may not be offered a choice of rent more than once a year. Alternatively, a PHA may give families no more than two opportunities to choose between a flat rent and an income-based rent within the same one-year period.

The period of availability ends on June 30, 2021.

MEMO

April 16, 2020

TO: Michael R. Fraley, Executive Director

FROM: Dusti Dennis, Deputy Director

SUBJECT: Board Recommendation
COVID-19 Statutory and Regulatory Waivers for the Public Housing &
Housing Choice Voucher Programs

On April 10, 2020, the Department of Housing & Urban Development (HUD), issued Notice PIH 2020-05 pursuant to the authority provided under the Coronavirus Aid, Relief and Economic Security (CARES) Act, waiving and establishing alternative requirements for numerous statutory and regulatory requirements for the Public Housing and Housing Choice Voucher programs.

These waivers are only temporary and expire at the dates provided in the notice.

The Housing Authority of the City of Erie finds the following waivers beneficial to its operations during the COVID 19 pandemic and is presenting these waivers to the HACE Board for approval:

PH and HCV-3: Family Income and Composition: Annual Examination – Income Verification Requirements

HUD is waiving the requirements to use the income hierarchy described by PIH Notice 2018-18 and will allow PHAs to forgo third-party income verification requirements for annual reexaminations, including the use of EIV (Enterprise Income Verification). During the allowable period of availability, the PHAs may consider self-certification as the highest form of income verification to process annual reexaminations.

The period of availability to conduct annual reexaminations using these modified verification requirements ends on July 31, 2020.

PH and HCV-4: Family Income and Composition: Interim Examinations

HUD is waiving the requirements to use the income verification hierarchy as described by PIH Notice 2018-18. HUD will allow PHAs to forgo third-party income verification requirements for interim reexaminations, including the required use of EIV. During the allowable period of eligibility, PHAs may consider self-certification as the highest form of income verification to process interim reexaminations.

The period of availability ends on July 31, 2020.

PH and HCV-5: Enterprise Income Verification (EIV) Monitoring

PIH Notice 2018-18 specifies the required monitoring of EIV reports. HUD is waiving the mandatory EIV monitoring requirements.

The period of availability ends on July 31, 2020

HQS-1: Initial Inspection Requirements

Section 8 (o)(8)(A)(i) requires that the PHA must inspect the unit before any assistance payment is made to determine whether the unit meets HQS. Section 8(o)(8)(C) requires the PHA to conduct the initial inspection within certain time frames after receiving the RFTA (Request for Tenancy Approval). Section 982.305 provides that the PHA may not approve the assisted tenancy or execute a HAP contract until the unit has been inspected by the PHA and passes HQS. HUD is waiving these requirements and providing an alternative requirement. In order to place the unit under HAP contract and commence making payments, the PHA may rely on the owner's certification that the owner has no reasonable basis to have knowledge that life-threatening conditions exist in the unit. At minimum the PHA must require this owner certification. The PHA is required to conduct an HQS inspection on the unit as soon as reasonably possible but no later than October 31, 2020.

The period of availability for PHAs to accept owner's self-certification for an initial inspection ends on July 31, 2020. The period of availability for the PHA to inspect a unit that was placed under HAP contract based on the owner's self-certification ends on October 31, 2020.

HQS-3: Initial Inspection: Non-Life-Threatening Deficiencies (NLT) Option

Section 8(o)(8)(A)(ii) provides the PHA with the option to choose to approve an assisted tenancy, execute the HAP Contract, and begin making housing assistance payments on a unit that fails the initial HQS inspection, provided the unit's failure to meet HQS is the result only of NLT conditions. The statute further requires that the PHA must withhold housing assistance payments from the owner if the NLT conditions are not corrected within 30 days.

HUD is waiving the requirement that the PHA must withhold the payment if the NLT repairs are not made in 30 days. Instead, the PHA may provide an extension of up to an additional 30 days to the owner to make the NLT repairs and continue to make payments to the owner during the period of that maximum 30-day extension.

The period of availability for the PHAs to approve an extension of up to an additional 30 days ends on July 31, 2020. The extension to make the NLT repairs may extend beyond July 31, 2020, depending on the date the PHA approved the extension.

HQS-6: HQS Interim Inspection

The statute requires that upon notification to the PHA by a family or government official that the assisted unit does not comply with the HQS, the PHA must inspect the unit within 24 hours of when the PHA received the notification if the condition is life-threatening. 24 CFR 982.405(g) provides that if the reported condition is not life-threatening, the PHA must inspect the unit within 15 days. The regulation further provides that in the event of extraordinary circumstances HUD may waive the 24-hour or the 15-day inspection requirement until such time as an inspection is feasible.

HUD is waiving these requirements and establishing an alternative for both tenant-based and PBV units. If the reported deficiency is life-threatening, the PHA must notify the owner of the reported life-threatening deficiency and that the owner must either correct the life-threatening deficiency within 24 hours of the PHA notification or provide documentation that the reported deficiency does not exist. HACE will require the owner to submit a photo documenting that the repair has been made.

The period of availability ends on July 31, 2020. After July 31, 2020, the PHA must conduct the HQS inspection in accordance with the applicable time periods upon notification by a family or government official that the assisted unit does not comply.

HQS-7: PBV Turnover Unit Inspections

The regulation requires that before providing assistance to a new family in a PBV contract unit, the PHA must inspect the unit. HUD is waiving this regulatory requirement and providing as an alternative requirement the PHA may rely on the owner's certification that the owner has no reasonable basis to have knowledge that life threatening conditions exist in the unit or units in question to allow a new family to occupy the vacated PBV unit.

The period of availability to fill a turnover PBV unit without conducting an HQS inspection ends on July 31, 2020.

HCV-2: Information When Family is Selected – PHA Oral Briefing

The regulation requires when the PHA selects a family to participate in either the HCV or PBV program, the PHA must give the family an oral briefing. HUD is waiving this requirement and as an alternative requirement allowing the PHA to conduct the briefing by other means such as a webcast, video call, or expanded information packet.

The period of availability ends on July 31, 2020.

HCV-6: Automatic Termination of HAP Contract

When an HCV family's income increases to the extent that the housing assistance payment is reduced to \$0, PHAs are required by this regulation to automatically terminate HAP contracts 180 days after the last housing assistance payment to the owner. HUD is waiving this requirement. As an alternative requirement, the PHA, upon written notice to the owner and family, may extend the period of time following the last payment to the owner that triggers the automatic termination of the HAP contract. The extension beyond the normally applicable 180 days is determined by the PHA but may not extend beyond December 31, 2020.

The period of availability for the extension ends December 31, 2020.

PH-1: Fiscal Closeout of Capital Grant Funds

Section 905.322(b) establishes deadlines for the submission of an Actual Development Cost Certificate Development Cost Certificate (ADCC) and an Actual Modernization Cost Certificate (AMCC) (two financial reporting documents required to close out Capital Fund grants). Specifically, the ADCC must be submitted 12 months from the date of completion or HUD termination of a development activity, and the AMCC must be submitted not later than 12 months from the activity's expenditure deadline. HUD is waiving this requirement and extending the deadlines for an ADCC or AMCC that fell between March 1, 2020 and September 30, 2020, by 6 months.

Applies to ADCC and AMCC forms due between March 1 and September 30, 2020.

PH-5: Community Service and Self-Sufficiency Requirement (CSSR)

The statute and regulations require that each adult resident of public housing except for any family member that is exempt, must contribute 8 hours per month of community service or participate in an economic self-sufficiency program or a combination of both. HUD is waiving this requirement and is alternatively suspending the community service and self-sufficiency requirement. If the PHA adopts this waiver, tenants will not be subject to this requirement until the family's next annual reexamination.

The period of availability ends on March 31, 2021.

PH-10: Tenant Notifications for Changes to Project Rules and Regulations

PHAs are required to provide 30-day notice to impacted families for changes to policies, rules and special charges to families. HUD is waiving the requirement to provide such advance notice, except advance notice must be provided for any changes related to tenant charges. Although HUD is waiving the advanced notice, PHAs must still provide adequate notification to impacted families within 30 days of making such changes.

The period of availability ends on July 31, 2020.

ATTACHMENT D

**PERFORMANCE REPORT
CAPITAL FUND 2017**

**COPY AVAILABLE FOR INSPECTION
AT HACE ADMINISTRATIVE OFFICE
606 HOLLAND STREET
ERIE, PA 16501**

ATTACHMENT E

**PERFORMANCE REPORT
CAPITAL FUND 2018**

**COPY AVAILABLE FOR INSPECTION
AT HACE ADMINISTRATIVE OFFICE
606 HOLLAND STREET
ERIE, PA 16501**

ATTACHMENT F

**PERFORMANCE REPORT
CAPITAL FUND 2019**

**COPY AVAILABLE FOR INSPECTION
AT HACE ADMINISTRATIVE OFFICE
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ERIE, PA 16501**

ATTACHMENT G

**PERFORMANCE REPORT
CAPITAL FUND 2020**

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606 HOLLAND STREET
ERIE, PA 16501**

ATTACHMENT H

PERFORMANCE REPORT CAPITAL FUND 2021

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ATTACHMENT I

FY 2022 – 2026 CAPITAL FUND 5-YEAR ACTION PLAN

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0157
Expires 3/31/2020

Part I : Summary		Locality: (City/County & State)				Revision No.	
PHA Name: Housing Authority of the City of Erie		Erie, PA				X_ Original	
Development Number/Name	Work Statement for Year 1 FFY: 2022	Work Statement for Year 2 FFY : 2023	Work Statement for Year 3 FFY : 2024	Work Statement for Year 4 FFY : 2025	Work Statement for Year 5 FFY : 2026		
A. Development Number/Name							
PA013-000001 AMP Group #1		571,700	1,038,415	857,200	982,005		
PA013-000002 AMP Group #2		1,342,092	1,112,119	496,565	1,145,205		
PA013-000003 AMP Group #3		881,665	758,498	509,630	413,950		
PA013-000004 AMP Group #4		454,140	197,365	384,702	497,887		
PA013-000005 AMP Group #5		22,500	35,000	624,000	120,000		
PA013-000006 AMP Group #6		91,000	155,700	445,000	199,500		
PA013-000007 AMP Group #7		39,000	105,000	85,000	43,550		
B. Physical Improvements Subtotal		3,402,097	3,402,097	3,402,097	3,402,097		
C. Management Improvements		0	0	0	0		
D. PHA-Wide Non-dwelling Structures and Equipment		0	0	0	0		
E. Administration							
PA013-000001 AMP Group #1		109,505	109,505	109,505	109,505		
PA013-000002 AMP Group #2		92,166	92,166	92,166	92,166		
PA013-000003 AMP Group #3		138,389	138,389	138,389	138,389		
PA013-000004 AMP Group #4		40,023	40,023	40,023	40,023		
PA013-000005 AMP Group #5		54,397	54,397	54,397	54,397		
PA013-000006 AMP Group #6		56,371	56,371	56,371	56,371		
PA013-000007 AMP Group #7		22,548	22,548	22,548	22,548		
F. Other - Site Acquisition							
PA013-000001 AMP Group #1		10,000	10,000	10,000	10,000		
G. Operations							
PA013-000001 AMP Group #1		302,770	302,770	302,770	302,770		
PA013-000002 AMP Group #2		87,904	87,904	87,904	87,904		
PA013-000003 AMP Group #3		263,876	263,876	263,876	263,876		
PA013-000004 AMP Group #4		70,941	70,941	70,941	70,941		
PA013-000005 AMP Group #5		271,091	271,091	271,091	271,091		
PA013-000006 AMP Group #6		291,948	291,948	291,948	291,948		
PA013-000007 AMP Group #7		19,968	19,968	19,968	19,968		
H. Demolition		0	0	0	0		
I. Development		0	0	0	0		
J. Capital Fund Financing - Debt Service		0	0	0	0		
K. Total CFP Funds		5,233,994	5,233,994	5,233,994	5,233,994		
L. Total Non-CFP Funds		0	0	0	0		
M. Grand Total		5,233,994	5,233,994	5,233,994	5,233,994		

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2020

Part II: Supporting Pages - Physical Needs Work Statement(s)		Work Statement for Year 2 FFY: 2023		Work Statement for Year 3 FFY: 2024		
Work Statement for Year 1 FFY: 2022	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000001 AMP Group #1			PA013-000001 AMP Group #1		
	Repair shed foundations	8 units	59,000	Harbor Homes (224 units) Replace kitchen sink drains and drain line	108 units	125,000
	Replace front and back soffit lighting	224 units	45,000	Replace gas lines	196 units	98,000
	Resurface parking areas	lump sum	40,000	Replace sidewalks	lump sum	82,365
	Secure attic hatches	lump sum	25,500	Replace lights to LED	136 units	75,000
				Replace interior doors and frames	50 units	50,000
				Replace flooring	25 units	25,000
				Install stair treads	224 units	10,000
				Harbor Homes Annex (121 units)		
		Replace kitchen cabinets	25 units	75,000	Renovate bathrooms	25 units
	Replace interior doors & frames	20 units	40,000	Insulate exterior walls & attic, move bathroom exhausts	lump sum	100,000
	Replace stoops and handrails	8 units	40,000	Replace lights to LED	121 units	65,000
	Replace lower gutters and soffit	121 units	10,000	A/C replacement	20 units	62,500
				Replace gable vents	29 bldgs	20,000
				Replace exterior lighting	lump sum	20,000
				Move light switch from tub area	121 units	17,850
				Install stair treads	121 units	8,000
	Subtotal of Estimated Cost		334,500	Subtotal of Estimated Cost		908,715

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 2 FFY: 2023			Work Statement for Year 3 FFY: 2024		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000001 AMP Group #1			PA013-000001 AMP Group #1		
	Replace kitchen cabinets	9 units	27,000	<u>13-7 Scattered Sites (9 units)</u> Exterior painting	9 units	26,000
	Install exterior shed	2 units	20,000	Replace exterior doors, frames and locks	9 units	22,500
	Replace lights to LED	9 units	18,000	Replace sidewalks and driveways	lump sum	10,000
	Install bedroom and living room ceiling fixtures/fans	9 units	13,500	Waterproof basements	2 units	10,000
	Replace bi-fold and sliding doors	9 units	5,400	Replace floors	4 units	8,000
	Replace roofing shingles	1 bldg	4,500	<u>13-8 Scattered Sites (68 units)</u> Replace stoops and handrails	5 units	24,000
	Install basement windows and screens	9 units	3,600	Replace roofing shingles	2 units	10,000
	Replace window wells	9 units	2,000	<u>13-18 Scattered Sites (2 units)</u> Replace roofing shingles	1 unit	5,000
	Replace window wells	68 units	68,000	Exterior painting	2 units	5,000
	Install basement windows and screens	68 units	28,000	Install basement windows and screens	2 units	3,200
	Install ceiling fans	68 units	26,000	Replace window wells	2 units	2,000
	Replace bi-fold and sliding doors	33 units	20,000	Replace exterior meter box and grounding	2 units	2,000
	Replace bi-fold and sliding doors	2 units	1,200	Install ceiling fans	2 units	2,000
		Subtotal of Estimated Cost		237,200	Subtotal of Estimated Cost	

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 4 FFY: 2025			Work Statement for Year 5 FFY: 2026		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000001 AMP Group #1 (cont)			PA013-000001 AMP Group #1 (cont)		
	<u>Harbor Homes (224 units)</u>			<u>Harbor Homes (224 units)</u>		
	Insulate exterior walls	80 units	125,000	Rewire complete unit	50 units	200,000
	Install bathroom exhaust	212 units	56,800	Replace kitchen cabinets	10 units	30,000
	Replace roofing shingles	3 bldgs	40,000	Replace drum traps	200 units	20,000
	Install rain guards	224 units	16,800			
	Replace security lights at Admin Building	lump sum	12,000			
	<u>Harbor Homes Annex (121 units)</u>			<u>Harbor Homes Annex (121 units)</u>		
	Replace basement windows and screens	75 units	100,000	Rewire complete unit	16 units	112,000
	Ground drainage system and landscaping	10 areas	65,600	Install security screens	121 units	50,000
	Replace basement steps	25 units	50,000	Replace sidewalks	lump sum	50,000
				Replace flooring	20 units	40,000
				Resurface parking lot	lump sum	40,000
				Replace interior doors and frames	20 units	30,000
<u>13-7 Scattered Sites (9 units)</u>			<u>13-7 Scattered Sites (9 units)</u>			
Replace siding	9 units	75,000	Renovate bathrooms	4 units	24,000	
Replace stoops and railings	9 units	40,000	Replace electric panels, meter boxes and grounding	9 units	9,000	
	Subtotal of Estimated Cost	581,200		Subtotal of Estimated Cost	605,000	

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 4 FFY: 2025		Work Statement for Year 5 FFY: 2026			
	Description of Major Work Categories	Quantity	Estimated Cost	Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000001 AMP Group #1			PA013-000001 AMP Group #1		
	13-8 Scattered Sites (68 units)			13-8 Scattered Sites (68 units)		
	Replace exterior bricks between windows	lump sum	100,000	Replace kitchen cabinets	36 units	90,000
	Replace siding	34 units	75,000	Replace sidewalks	lump sum	77,365
	Install exterior shed	5 units	50,000	Replace electric panels, meter boxes, weather heads and grounding	68 units	68,000
	Exterior painting	16 units	45,000	Install roof vents	68 units	44,000
	Renovate bathrooms	1 units	6,000	Replace kitchen and bath fixtures	68 units	28,000
				Waterproof basements	4 units	20,000
				Replace flooring	8 units	16,000
				13-18 Scattered Sites (2 units)		
				Renovate bathrooms	2 units	24,000
				Replace kitchen cabinets	2 units	4,000
				Replace lights to LED	2 units	4,000
				Replace kitchen and bath fixtures	2 units	1,640
	Subtotal of Estimated Cost		276,000	Subtotal of Estimated Cost		377,005

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 2 FFY: 2023			Work Statement for Year 3 FFY: 2024		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000002 AMP Group #2			PA013-000002 AMP Group #2		
	<u>Lake City (40 units)</u>			<u>Lake City (40 units)</u>		
	Replace roofing shingles & fascia	3 bldgs	75,000	Replace cold air return with smaller grid screens	40 units	80,000
	Renovate bathrooms	5 units	30,000	Replace stoops and handrails	40 units	60,000
	Replace lights to LED	40 units	8,000	Resurface parking lots	lump sum	50,000
				Replace sidewalks	lump sum	25,000
	13-7 Scattered Sites (61 units)			13-7 Scattered Sites (61 units)		
	Renovate bathrooms	15 units	100,000	Replace driveways & sidewalks	lump sum	75,000
	Replace bath and kitchen fixtures	61 units	82,450	Install ceiling fans	61 units	75,000
	Replace exterior meter box and grounding	61 units	61,000	Replace flooring	10 units	20,000
	Replace stoops and sidewalks	lump sum	50,000			
	Install basement windows and screens	61 units	48,800			
	Install French drains	9 units	45,000			
	Replace roofing shingles	8 bldgs	40,131			
Replace lights to LED	61 units	12,200				
Replace window wells	61 units	6,250				
	Subtotal of Estimated Cost		558,831	Subtotal of Estimated Cost		385,000

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 2 FFY: 2023		Work Statement for Year 3 FFY: 2024			
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000002 AMP Group #2 (cont)			PA013-000002 AMP Group #2 (cont)		
	Renovate bathrooms	13 units	90,000	<u>13-8 Scattered Sites (97 units)</u> Install basement windows and screens	97 units	152,119
	Replace stoops and sidewalks	lump sum	75,000	Replace exterior meter box and grounding	97 units	97,000
	Replace roofing shingles, gutters and downspouts	9 bldgs	44,600	Replace window wells	97 units	38,800
	Install support posts in basement	10 each	40,000	Replace lights to LED	97 units	20,000
	Replace bath and kitchen fixtures	97 units	38,316	Replace flooring	10 units	20,000
	Install French drains	7 units	36,000	Install screen doors	16 units	16,000
				Site work/landscaping	lump sum	7,900
				<u>13-10 Eastbrook (50 units)</u> Replace basement and second floor stairs	25 units	125,000
				Replace floors	15 units	30,000
			Install stair treads	50 units	5,000	
	Subtotal of Estimated Cost		398,916	Subtotal of Estimated Cost		511,819

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 2 FFY: 2023			Work Statement for Year 3 FFY: 2024		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000002 AMP Group #2 (cont)			PA013-000002 AMP Group #2 (cont)		
	13-17 Scattered Sites (32 units)			13-17 Scattered Sites (32 units)		
	Replace stoops and handrails	16 units	80,000	Update electric lines	32 units	40,000
	Replace kitchen cabinets	32 units	50,000	Replace sidewalks	lump sum	25,000
	Reconfigure façade and roof lines	1 unit	25,705	Replace roofing shingles/repair roofs	4 units	21,200
	Reconfigure front porches	1 unit	25,700	Electrical improvements	10 units	8,300
	Replace window wells	32 units	12,800	Replace lights to LED	32 units	6,400
	Waterproof basements	2 units	10,000			
	13-18 Scattered Sites (47 units)			13-18 Scattered Sites (47 units)		
	Replace roofing shingles/repair roofs	33,850 sf	69,430	Replace stoops and handrails	10 units	50,000
	Replace exterior meter box and grounding	47 units	47,000	Replace kitchen and bathroom floors	10 units	20,000
	Reconfigure façade and roof lines	2 units	43,710	Replace sidewalks	lump sum	20,000
	Waterproof basements	2 units	10,000	Replace kitchen cabinets	5 units	15,000
	Replace floors	5 units	10,000	Replace lights to LED	47 units	9,400
	Subtotal of Estimated Cost		384,345	Subtotal of Estimated Cost		215,300

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 4 FFY: 2025			Work Statement for Year 5 FFY: 2026		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000002 AMP Group #2 Lake City (40 units) Replace wingwalls and façade	10 units	30,000	PA013-000002 AMP Group #2 Lake City (40 units) Replace cast iron waste pipes with PVC	5 bldgs	110,000
				Replace water mains in apts and add shutoff valves	lump sum	100,000
				Replace gray water drain lines, clean and disinfect craw	5 bldgs	90,000
				Replace floors	15 units	30,000
				Replace cold air returns	40 units	24,000
				Replace security lights	lump sum	5,000
				13-7 Scattered Sites (61 units) Replace basement stairs	5 units	20,000
				13-8 Scattered Sites (97 units) Replace exterior bricks between windows	50 units	100,000
				Replace basement stairs	5 units	20,000
				Reconfigure downspouts	lump sum	4,100
	Subtotal of Estimated Cost		226,700	Subtotal of Estimated Cost		503,100

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 4 FFY: 2025		Work Statement for Year 5 FFY: 2026			
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000002 AMP Group #2			PA013-000002 AMP Group #2		
	13-10 Eastbrook (50 units)	5 bldgs	87,365	13-10 Eastbrook (50 units)	10 units	175,000
	Replace roofs, gutters and downspouts	lump sum	50,000	Replace stack pipes for sewer drains	10 units	70,000
	Point bricks on all buildings	50 locks	20,000	Renovate bathrooms	5 units	40,000
	Replace front and back exterior door locks	50 units	10,000	Replace stoops and sidewalks	50 units	39,340
	Replace lights to LED			Replace kitchen and bath fixtures	50 units	28,085
				Replace security screens	3 units	13,250
				Replace kitchen cabinets and counter tops	50 units	8,300
				Replace tub drains	3 units	5,000
				Replace interior doors		
	Subtotal of Estimated Cost		167,365	Subtotal of Estimated Cost		378,975

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 4 FFY: 2025			Work Statement for Year 5 FFY: 2026		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000002 AMP Group #2 (cont.)			PA013-000002 AMP Group #2 (cont)		
	<u>13-17 Scattered Sites (32 units)</u>			<u>13-17 Scattered Sites (32 units)</u>		
	Exterior painting	16 units	40,000	Replace exterior meter box and grounding	32 units	32,000
	Renovate bathrooms	7 units	40,000	Install basement windows and screens	32 units	25,600
	Replace floors	5 units	10,000	Replace basements stairs	5 units	20,000
	<u>13-18 Scattered Sites (47 units)</u>			<u>13-18 Scattered Sites (47 units)</u>		
	Exterior painting	5 units	12,500	Install basement windows and screens	47 units	37,600
				Renovate bathrooms	47 units	37,130
				Replace kitchen and bath fixtures	47 units	37,000
				Replace roofs	5 units	35,000
			Replace basement stairs	5 units	20,000	
			Replace window well	47 units	18,800	
	Subtotal of Estimated Cost		102,500	Subtotal of Estimated Cost		263,130

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 2 FFY: 2023			Work Statement for Year 3 FFY: 2024		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000003 AMP Group #3			PA013-000003 AMP Group #3		
	Exterior painting	22 units	135,000	Resurface parking areas	lump sum	100,000
	Replace/repair outside gutters and downspouts	22 bldgs	100,000	Plumbing for water meters and backflow preventers	8 units	78,945
	Replace lights to LED	429 units	85,800	Seal and stripe parking areas	lump sum	75,000
	Replace kitchen cabinets	50 units	75,000	Replace roofing shingles, gutters & downspouts	15 bldgs	75,000
	Renovate bathrooms	13 units	75,000	Replace carpet in one bedroom units	34 units	50,000
	Insulate exterior walls and attic, move bathroom exhaust	25 units	50,000	Raise sanitary sewers & manholes to ground level	lump sum	50,000
	Replace tub surrounds	35 units	22,500	Replace flooring	20 units	39,973
				Replace stair treads	429 units	15,000
		Subtotal of Estimated Cost		543,300	Subtotal of Estimated Cost	

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 2 FFY: 2023		Work Statement for Year 3 FFY: 2024		Quantity	Estimated Cost
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories		
See Annual Statement	PA013-000003 AMP Group #3			PA013-000003 AMP Group #3		
	13-8 Scattered Sites (6 units)			13-8 Scattered Sites (6 units)		
	Replace sidewalk	lump sum	20,000	Install ceiling fans	6 units	14,880
	Replace flooring	6 units	12,000	Replace kitchen cabinets	6 units	9,000
	Replace exterior meter box and grounding	6 units	6,000	Replace electrical lines (Cranch Ave)	6 units	5,000
	13-11 Bird Drive (50 units)			13-11 Bird Drive (50 units)		
	Replace stoops and handrails	50 units	105,365	Replace stair treads and stringers	47 units	117,500
	Resurface parking areas	lump sum	100,000	Renovate bathrooms	15 units	90,000
	Seal and stripe parking areas	lump sum	95,000	Replace black steel pipe drain lines	3000 lf	25,000
				Replace tubs and surrounds	10 units	8,200
			Install basement venting	50 units	5,000	
	Subtotal of Estimated Cost		338,365	Subtotal of Estimated Cost		274,580

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 4 FFY: 2025		Work Statement for Year 5 FFY: 2026			
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000003 AMP Group #3			PA013-000003 AMP Group #3		
	<u>John E. Horan Garden Apts. (429 units)</u> Replace exterior doors, frames and locksets	50 units	100,000	<u>John E. Horan Garden Apts. (429 units)</u> Insulate exterior walls	8 units	79,000
	Replace sidewalk	lump sum	50,000	Replace siding	1 bldg	75,000
	Replace windows and security screens	50 units	70,000	Renovate Administrative Office	lump sum	50,000
	Update heating and cooling system-Admin office, Community Center and Shop	lump sum	50,000	Install receptacles and cement board insulation in shed	50 units	40,000
	Replace individual main water shut off	lump sum	30,000	Replace light poles	lump sum	25,000
	Replace dryer draft fans	30 units	12,000	Remove closet doors/install rod	200 units	25,000
	Install cable ready capability for 2nd floor	lump sum	10,000	Repair/replace playgrounds	lump sum	25,000
	Replace stoops and handrails	6 units	10,000	Repair/replace fence	lump sum	25,000
				Replace interior panel doors, bath, closets and bedrooms	3 units	8,000
				Install attic insulation and move bath exhaust (Franklin Ave)	1 unit	7,000
		Subtotal of Estimated Cost		332,000	Subtotal of Estimated Cost	

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 4 FFY: 2025		Work Statement for Year 5 FFY: 2026			
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000003 AMP Group #3			PA013-000003 AMP Group #3		
	13-8 Scattered Sites (6 units) Exterior painting	6 units	15,000	13-8 Scattered Sites (6 units) Replace bath and kitchen fixtures	6 units	12,650
	Replace exterior doors, frames and locksets	6 units	10,000	Install basement windows and screens	6 units	4,800
				Replace stoops and handrails	6 units	3,600
				Replace window wells	6 units	2,400
				Replace lights to LED	6 units	1,500
				13-11 Bird Drive (50 units) Replace floors	10 units	20,000
				Replace lights to LED	50 units	10,000
	Subtotal of Estimated Cost		177,630	Subtotal of Estimated Cost		54,950

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0228
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 2 FFY: 2023		Work Statement for Year 3 FFY: 2024			
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000004 AMP Group #4			PA013-000004 AMP Group #4		
	<u>13-8 Scattered Sites (10 units)</u>			<u>13-7 Scattered Sites (8 units)</u>		
	Renovate bathrooms	8 units	48,520	Replace kitchen cabinets	8 units	25,000
	Replace roofing shingles	5 bldgs	28,800	Replace sidewalks and driveways	lump sum	10,000
	Basement repairs	1 unit	3,800	Replace roofing shingles	1 bldg	4,000
	Replace lights to LED	10 units	2,000	Replace window wells	8 units	3,200
	<u>13-9 Priscaro Apartments (53 units)</u>			<u>13-8 Scattered Sites (10 units)</u>		
	Replace windows and security screens	lump sum	188,520	Replace bath and kitchen cabinets	2 units	3,900
	Renovate bathrooms	10 units	60,000	<u>13-9 Priscaro Apartments (53 units)</u>		
	Replace roofing shingles	5 bldgs	30,000	Replace lights to LED	53 units	10,065
	Replace kitchen fixtures	53 units	20,000	Replace basement lights to switch instead of pull string	53 units	10,000
	Replace bathroom plumbing fixtures	25 units	15,000			
	Replace kitchen, bath, hallway doors	15 units	12,000			
	Replace flooring	6 units	12,000			
Subtotal of Estimated Cost		420,640	Subtotal of Estimated Cost		66,165	

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 2 FFY: 2023			Work Statement for Year 3 FFY: 2024		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000004 AMP Group #4			PA013-000004 AMP Group #4		
	Replace flooring	10 units	20,000	13-14 Pineview (68 units) Replace kitchen cabinets	15 units	50,000
	Replace kitchen, bath and hallway doors	15 units	12,000	Replace Admin building roof	lump sum	30,000
				Replace basement windows and screens	68 units	27,200
				Replace stoops and handrails	6 units	13,000
	13-18 Scattered Sites (3 units) Replace window wells	3 units	1,500	Replace kitchen & bathroom plumbing fixtures	6 units	6,000
				Install stair treads	68 units	5,000
	Subtotal of Estimated Cost		33,500	Subtotal of Estimated Cost		131,200

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 4 FFY: 2025			Work Statement for Year 5 FFY: 2026		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000004 AMP Group #4			PA013-000004 AMP Group #4		
	Exterior painting	4 units	10,000	13-7 Scattered Sites (8 units) Renovate bathrooms	4 units	24,000
	Replace floors	4 units	8,000	Install basement windows and screens	8 units	6,400
	Replace entry doors, frames and locksets	4 units	4,800	Install ceiling fans	8 units	6,400
				Replace lights to LED	8 units	2,000
	13-8 Scattered Sites (10 units)			13-8 Scattered Sites (10 units)		
	Replace basement security screens	10 units	15,000	Replace exterior brick between windows	10 units	20,000
	Exterior painting	4 units	10,000	Replace stoops and handrails	10 units	16,087
	Replace floors	4 units	8,000	Replace exterior meter box and grounding	10 units	10,000
	Replace entry doors, frames and locksets	4 units	4,800	Install ceiling fans	10 units	8,000
			Install basement windows and screens	10 units	8,000	
			Replace exterior panel boxes	10 units	7,900	
			Replace window wells	10 units	4,000	
	Subtotal of Estimated Cost		60,600	Subtotal of Estimated Cost		112,787

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 3/31/2020

Work Statement for Year I FFY: 2022	Work Statement for Year 4 FFY: 2025			Work Statement for Year 5 FFY: 2026		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000004 AMP Group #4			PA013-000004 AMP Group #4		
	13-9 Priscaro Apartments (53 units)			13-9 Priscaro Apartments (53 units)		
	Tuck and point bricks	lump sum	87,102	Replace roofs, gutters and downspouts	10 units	100,000
	Exterior painting	11 bldgs	60,000	Replace sidewalks	lump sum	50,000
	Replace sloop sinks	5 units	10,000	Replace kitchen cabinets, countertops and flooring	16 units	42,500
				Replace kitchen plumbing fixtures	53 units	20,000
				Replace stair treads	53 units	5,000
				13-14 Pineview (68 units)		
	Tuck and point bricks	lump sum	50,000	Renovate bathrooms	10 units	60,000
	Replace sidewalks, curbs and aprons	lump sum	25,000	Install ceiling lights	68 units	35,000
Replace countertops and cabinets	lump sum	20,000	Repave basketball court, stripe, fence and new equipment	lump sum	25,000	
Replace sloop sinks	5 units	10,000	Replace roofs, gutters and downspouts	2 bldgs	20,000	
Signage	lump sum	5,000	Resurface playground	lump sum	5,000	
	Subtotal of Estimated Cost		267,102	Subtotal of Estimated Cost		362,500

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 4 FFY: 2025			Work Statement for Year 5 FFY: 2026		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000004 AMP Group #4			PA013-000004 AMP Group #4		
	<u>13-18 Scattered Sites (3 units)</u>			<u>13-18 Scattered Sites (3 units)</u>		
	Renovate bathrooms	3 units	18,000	Exterior painting	3 units	7,500
	Replace kitchen cabinets	3 units	10,000	Install basement windows and screens	3 units	7,000
	Replace interior doors	3 units	10,000	Replace basement security screens	3 units	4,500
	Replace slop sinks	3 units	10,000	Replace entry doors, frames and locksets	3 units	3,600
	Replace kitchen and bathroom plumbing fixtures	3 units	3,000			
	Replace stoops and handrails	3 units	3,600			
	Install ceiling fans	3 units	2,400			
		Subtotal of Estimated Cost		57,000	Subtotal of Estimated Cost	

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 2 FFY: 2023		Work Statement for Year 3 FFY: 2024		Quantity	Estimated Cost
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories		
See Annual Statement	PA013-000005 AMP Group #5 <u>Schmid Towers (193 units)</u> Exterior caulking Replace floors	lump sum 5 units	12,500 10,000	PA013-000005 AMP Group #5 <u>Schmid Towers (193 units)</u> Install additional security cameras Replace carpet in apartments	lump sum 15 units	20,000 15,000
	Subtotal of Estimated Cost		22,500	Subtotal of Estimated Cost		35,000

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 3/31/2020

Work Statement for Year I FFY: 2022	Work Statement for Year 4 FFY: 2025			Work Statement for Year 5 FFY: 2026		
	Description of Major Work Categories	Quantity	Estimated Cost	Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000005 AMP Group #5			PA013-000005 AMP Group #5		
	Schmid Towers (193 units)			Schmid Towers (193 units)		
	Replace exhaust units at rooftop and clean duct work	lump sum	200,000	Replace sanitary pipes between kitchen and bath	88 units	45,000
	Upgrade UFAS units	5 units	100,000	Renovate mail delivery area	lump sum	40,000
	Upgrade air handling/filtration system	lump sum	100,000	Replace curbs	lump sum	20,000
	Update heating system - zone heating	lump sum	75,000	Replace auxiliary lighting	lump sum	10,000
	Replace interior doors	94 units	65,000	Replace sidewalks	lump sum	5,000
	Replace exterior doors and jams	lump sum	40,000			
	Repair concrete spalls	lump sum	30,000			
	Replace heaters in apartments	25 units	10,000			
Replace apartment doors	10 doors	4,000				
	Subtotal of Estimated Cost		624,000	Subtotal of Estimated Cost		120,000

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 2 FFY: 2023			Work Statement for Year 3 FFY: 2024		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000006 AMP Group #6			PA013-000006 AMP Group #6		
	Friendship Apts. (200 units)			Friendship Apts. (200 units)		
	Repair concrete spalls	lump sum	46,000	Resurface parking areas	lump sum	55,000
	Elevator repairs	lump sum	40,000	Replace apartment entry doors	25 units	30,000
	Replace door closers	10 units	5,000	Replace apartment lighting	lump sum	30,700
				Update security camera server	1	15,000
			Replace balcony netting	3 units	15,000	
			Replace sidewalks	lump sum	10,000	
	Subtotal of Estimated Cost		91,000	Subtotal of Estimated Cost		155,700

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0228
 Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 4 FFY: 2025			Work Statement for Year 5 FFY: 2026		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000006 AMP Group #6			PA013-000006 AMP Group #6		
	Replace roof	lump sum	300,000	Renovate/upgrade UFAS units	10 units	75,000
	Renovate bathrooms	100 units	75,000	Repair concrete on north and south sides of building	lump sum	38,500
	Renovate community kitchen	lump sum	45,000	Carpet in elevator lobbies	10,000 sf	36,000
	Replace floors	5 units	10,000	Exterior caulking	lump sum	35,000
	Replace exhaust fan motors	40 units	10,000	Replace/repair fencing	lump sum	15,000
	Install security screens, ground floor north side	lump sum	5,000			
	Subtotal of Estimated Cost		445,000	Subtotal of Estimated Cost		199,500

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 2 FFY: 2023			Work Statement for Year 3 FFY: 2024		
	Description of Major Work Categories	Quantity	Estimated Cost	Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000007 AMP Group #7			PA013-000007 AMP Group #7		
	<u>Ostrow Apts. (80 units)</u> Replace bathroom fans	42 units	20,000	<u>Ostrow Apts. (80 units)</u> Replace air conditioner and outside louvers	lump sum	75,000
	Replace carpet in apartments	15 units	15,000	Replace auto door openers	lump sum	20,000
	Replace floors	2 units	4,000	Replace sidewalks	lump sum	10,000
	Subtotal of Estimated Cost		39,000	Subtotal of Estimated Cost		105,000

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 4 FFY: 2025			Work Statement for Year 5 FFY: 2026		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	PA013-000007 AMP Group #7 <u>Ostrow Apts. (80 units)</u> Install water treatment system for boilers	lump sum	50,000	PA013-000007 AMP Group #7 <u>Ostrow Apts. (80 units)</u> Install bedroom ceiling fans	80 units	24,000
	Update fire alarm system	lump sum	25,000	High efficiency lighting in building and parking lot	lump sum	12,500
	Replace apartment doors	20 units	10,000	Replace kitchen and bath fixtures	60 units	7,050
	Subtotal of Estimated Cost		85,000	Subtotal of Estimated Cost		43,550

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 2 FFY: 2023			Work Statement for Year 3 FFY: 2024		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	<u>PA013-000001 AMP Group #1</u> <u>Administration</u> Administration Fee	lump sum	109,505	<u>PA013-000001 AMP Group #1</u> <u>Administration</u> Administration Fee	lump sum	109,505
	<u>Site Acquisition</u> Neighborhoods surrounding public housing developments	lump sum	10,000	<u>Site Acquisition</u> Neighborhoods surrounding public housing developments	lump sum	10,000
	<u>Operations</u> Community Oriented Police Services	4 officers	292,770	<u>Operations</u> Community Oriented Police Services	4 officers	292,770
	Economic Development	lump sum	10,000	Economic Development	lump sum	10,000
	Subtotal of Estimated Cost		422,275	Subtotal of Estimated Cost		422,275

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 4 FFY: 2025			Work Statement for Year 5 FFY: 2026		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	<u>PA013-000001 AMP Group #1</u> <u>Administration</u> Administration Fee	lump sum	109,505	<u>PA013-000001 AMP Group #1</u> <u>Administration</u> Administration Fee	lump sum	109,505
	<u>Site Acquisition</u> Neighborhoods surrounding public housing developments	lump sum	10,000	<u>Site Acquisition</u> Neighborhoods surrounding public housing developments	lump sum	10,000
	<u>Operations</u> Community Oriented Police Services	4 officers	292,770	<u>Operations</u> Community Oriented Police Services	4 officers	292,770
	Economic Development	lump sum	10,000	Economic Development	lump sum	10,000
	Subtotal of Estimated Cost		422,275	Subtotal of Estimated Cost		422,275

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 2 FFY: 2023			Work Statement for Year 3 FFY: 2024		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	<u>PA013-000002 AMP Group #2</u> <u>Administration</u> Administration Fee	lump sum	92,166	<u>PA013-000002 AMP Group #2</u> <u>Administration</u> Administration Fee	lump sum	92,166
	<u>Operations</u> Community Oriented Police Services	4 officers	87,904	<u>Operations</u> Community Oriented Police Services	4 officers	87,904
	Subtotal of Estimated Cost		180,070	Subtotal of Estimated Cost		180,070

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 4 FFY: 2025			Work Statement for Year 5 FFY: 2026		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	<u>PA013-000002 AMP Group #2</u> <u>Administration</u> Administration Fee	lump sum	92,166	<u>PA013-000002 AMP Group #2</u> <u>Administration</u> Administration Fee	lump sum	92,166
	<u>Operations</u> Community Oriented Police Services	4 officers	87,904	<u>Operations</u> Community Oriented Police Services	4 officers	87,904
	Subtotal of Estimated Cost		180,070	Subtotal of Estimated Cost		180,070

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 2 FFY: 2023			Work Statement for Year 3 FFY: 2024		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	<u>PA013-000003 AMP Group #3</u> <u>Administration</u> Administration Fee	lump sum	138,389	<u>PA013-000003 AMP Group #3</u> <u>Administration</u> Administration Fee	lump sum	138,389
	<u>Operations</u> Community Oriented Police Services	4 officers	263,876	<u>Operations</u> Community Oriented Police Services	4 officers	263,876
	Subtotal of Estimated Cost		402,265	Subtotal of Estimated Cost		402,265

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Part III: Supporting Pages - Management Needs Work Statement(s)			Estimated Cost	Quantity	Estimated Cost	
	Work Statement for Year 4 FFY: 2025	Work Statement for Year 5 FFY: 2026	Work Statement for Year 6 FFY: 2027				
Development Number/Name Description of Major Work Categories	Development Number/Name Description of Major Work Categories	Development Number/Name Description of Major Work Categories	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Quantity	Estimated Cost
<u>PA013-000003 AMP Group #3</u> <u>Administration</u> Administration Fee	<u>PA013-000003 AMP Group #3</u> <u>Administration</u> Administration Fee	<u>PA013-000003 AMP Group #3</u> <u>Administration</u> Administration Fee	<u>PA013-000003 AMP Group #3</u> <u>Administration</u> Administration Fee	lump sum	138,389	lump sum	138,389
<u>Operations</u> Community Oriented Police Services	<u>Operations</u> Community Oriented Police Services	<u>Operations</u> Community Oriented Police Services	<u>Operations</u> Community Oriented Police Services	4 officers	263,876	4 officers	263,876
Subtotal of Estimated Cost			402,265	Subtotal of Estimated Cost			402,265

See Annual Statement

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 2 FFY: 2023			Work Statement for Year 3 FFY: 2024		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	<u>PA013-000004 AMP Group #4</u> <u>Administration</u> Administration Fee	lump sum	40,023	<u>PA013-000004 AMP Group #4</u> <u>Administration</u> Administration Fee	lump sum	40,023
	<u>Operations</u> Community Oriented Police Services	4 officers	70,941	<u>Operations</u> Community Oriented Police Services	4 officers	70,941
	Subtotal of Estimated Cost		110,964	Subtotal of Estimated Cost		110,964

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 4 FFY: 2025			Work Statement for Year 5 FFY: 2026		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	<u>PA013-000004 AMP Group #4</u> <u>Administration</u> Administration Fee	lump sum	40,023	<u>PA013-000004 AMP Group #4</u> <u>Administration</u> Administration Fee	lump sum	40,023
	<u>Operations</u> Community Oriented Police Services	4 officers	70,941	<u>Operations</u> Community Oriented Police Services	4 officers	70,941
	Subtotal of Estimated Cost		110,964	Subtotal of Estimated Cost		110,964

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 2 FFY: 2023			Work Statement for Year 3 FFY: 2024		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	<u>PA013-000005 AMP Group #5</u> <u>Administration</u> Administration Fee	lump sum	54,397	<u>PA013-000005 AMP Group #5</u> <u>Administration</u> Administration Fee	lump sum	54,397
	<u>Operations</u> Community Oriented Police Services HomePLUS Social Services at Schmid Towers	4 officers 193 residents	32,549 238,542	<u>Operations</u> Community Oriented Police Services HomePLUS Social Services at Schmid Towers	4 officers 193 residents	32,549 238,542
	Subtotal of Estimated Cost		325,488	Subtotal of Estimated Cost		325,488

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 3/31/2020

Part III: Supporting Pages - Management Needs Work Statement(s)		Work Statement for Year 4				Work Statement for Year 5			
		Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost		
Work Statement for Year 1 FFY: 2022	PA013-000005 AMP Group #5				PA013-000005 AMP Group #5				
	<u>Administration</u> Administration Fee	lump sum	54,397		<u>Administration</u> Administration Fee	lump sum	54,397		
See Annual Statement	<u>Operations</u>				<u>Operations</u>				
	Community Oriented Police Services HomePLUS Social Services at Schmid Towers	4 officers 193 residents	32,549 238,542		Community Oriented Police Services HomePLUS Social Services at Schmid Towers	4 officers 193 residents	32,549 238,542		
	Subtotal of Estimated Cost		325,488		Subtotal of Estimated Cost		325,488		

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 2 FFY: 2023			Work Statement for Year 3 FFY: 2024		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	<u>PA013-000006 AMP Group #6</u> <u>Administration</u> Administration Fee	lump sum	56,371	<u>PA013-000006 AMP Group #6</u> <u>Administration</u> Administration Fee	lump sum	56,371
	<u>Operations</u> Community Oriented Police Services HomePLUS Social Services at Friendship Apts	4 officers 200 residents	43,669 248,279	<u>Operations</u> Community Oriented Police Services HomePLUS Social Services at Friendship Apts	4 officers 200 residents	43,669 248,279
	Subtotal of Estimated Cost		348,319	Subtotal of Estimated Cost		348,319

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 4 FFY: 2025			Work Statement for Year 5 FFY: 2026		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	<u>PA013-000006 AMP Group #6</u> <u>Administration</u> Administration Fee	lump sum	56,371	<u>PA013-000006 AMP Group #6</u> <u>Administration</u> Administration Fee	lump sum	56,371
	<u>Operations</u> Community Oriented Police Services	4 officers	43,669	<u>Operations</u> Community Oriented Police Services	4 officers	43,669
	HomePLUS Social Services at Friendship Apartments	200 residents	248,279	HomePLUS Social Services at Friendship Apartments	200 residents	248,279
	Subtotal of Estimated Cost		348,319	Subtotal of Estimated Cost		348,319

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 2 FFY: 2023			Work Statement for Year 3 FFY: 2024		
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	<u>PA013-000007 AMP Group #7</u> <u>Administration</u> Administration Fee	lump sum	22,548	<u>PA013-000007 AMP Group #7</u> <u>Administration</u> Administration Fee	lump sum	22,548
	<u>Operations</u> Community Oriented Police Services	4 officers	19,968	<u>Operations</u> Community Oriented Police Services	4 officers	19,968
	Subtotal of Estimated Cost		42,516	Subtotal of Estimated Cost		42,516

Capital Fund Program-Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 3/31/2020

Work Statement for Year 1 FFY: 2022	Work Statement for Year 4 FFY: 2025		Work Statement for Year 5 FFY: 2026			
	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name Description of Major Work Categories	Quantity	Estimated Cost
See Annual Statement	<u>PA013-000007 AMP Group #7</u> <u>Administration</u> Administration Fee	lump sum	22,548	<u>PA013-000007 AMP Group #7</u> <u>Administration</u> Administration Fee	lump sum	22,548
	<u>Operations</u> Community Oriented Police Services	4 officers	19,968	<u>Operations</u> Community Oriented Police Services	4 officers	19,968
	Subtotal of Estimated Cost		42,516	Subtotal of Estimated Cost		42,516

ATTACHMENT J

STATEMENT OF HOUSING NEEDS

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The needs assessment is based on an analysis of housing problems in the City of Erie by income level among renters, owners, and households with special needs. Needs were also identified through a comprehensive public outreach process that included stakeholder consultation, public hearings, neighborhood meetings, an online resident survey, and a review process designed to meaningfully engage citizens.

Data in this section was drawn primarily from HUD's Comprehensive Housing Affordability Strategy (CHAS) data set, which is a special tabulation of 2011-2015 American Community Survey (ACS) data from the Census Bureau. The CHAS data describes housing problems, such as overcrowding or incomplete kitchen and/or plumbing facilities, as well as cost burden, which occurs when a household pays more than 30% of its gross income on housing costs. Severe cost burden occurs when a household pays more than 50% of its gross income on housing costs.

Supplemental data were drawn from the 2011-2015 ACS 5-Year Estimates and other sources to provide additional context when needed.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

High housing costs reduce economic opportunities and access to prosperity, especially among lower-income households in the City of Erie. Real incomes in the area have declined while housing costs have risen, resulting in an increase in the need for affordable housing options. Between 2009 and 2015, the median income for City residents decreased by 7% after adjusting for inflation, while median rent increased by 37% and median home values decreased by 1.55%, both after adjusting for inflation. As housing costs continue to increase while incomes decrease, housing costs continue to represent a larger portion of household income for households in the City of Erie compared to 2009. The combination of falling inflation-adjusted income and rising housing costs translates to diminished buying power for households. Given a lack of decent, affordable housing options, the City of Erie's lower-income households often face a choice between deficient housing and cost burden.

As the data below show, the most significant housing issue identified is cost burden, defined as spending over 30% of household income on housing costs, such as mortgage and rent payments and utility expenses. According to CHAS data, 35.38% of City of Erie households are cost burdened. Similarly, severe cost burden is defined as spending over 50% of household income on housing. In Erie, 17.6% of households are severely cost burdened. Stakeholder feedback indicated a lack of accessible housing is also a need within the City of Erie, in addition to supportive housing resources for adults with mental health, substance abuse and intellectual/developmental disabilities.

The following are HUD-generated tables using 2011-2015 CHAS data that are part of the Consolidated Plan tool. These tables are automatically generated when creating the Consolidated Plan. Please note that HAMFI refers to "HUD Adjusted Median Family Income," which is the median family income calculated by HUD for each jurisdiction, in order to determine Fair Market Rents and income limits for HUD programs. HAMFI will not necessarily be the same as other calculations of median incomes such as a simple Census number due to a series of adjustments that are made. Where the HUD tables below report AMI (Area Median Income), they refer to HAMFI.

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	101,786	100,680	-1%
Households	40,490	41,130	2%
Median Income	\$33,293.00		3%
	(\$36,851.00 in 2015 dollars)	\$34,253.00	(-7% adjusted)

Table 5 - Housing Needs Assessment Demographics

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Housing Costs Table (SUPPLEMENTAL)

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	80,900 <i>(\$87,254 in 2015 dollars)</i>	85,900	6% <i>(-1.55% adjusted)</i>
Median Contract Rent	438 <i>(\$472 in 2015 dollars)</i>	648	17% <i>(+37% adjusted)</i>

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	8,110	6,865	7,755	4,785	13,620
Small Family Households	2,490	1,980	2,640	1,915	7,045
Large Family Households	550	505	525	300	785
Household contains at least one person 62-74 years of age	1,080	1,125	1,365	860	2,750
Household contains at least one person age 75 or older	685	1,390	1,425	430	680
Households with one or more children 6 years old or younger	1,805	1,035	1,089	890	1,045

Table 6 - Total Households Table

Data 2011-2015 CHAS
Source:

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	85	135	125	10	355	10	15	35	10	70

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	60	70	20	4	154	0	0	4	0	4
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	170	125	170	25	490	20	10	65	15	110
Housing cost burden greater than 50% of income (and none of the above problems)	4,260	870	105	10	5,245	820	565	235	15	1,635
Housing cost burden greater than 30% of income (and none of the above problems)	695	2,195	905	130	3,925	275	875	1,135	385	2,670
Zero/negative Income (and none of the above problems)	370	0	0	0	370	195	0	0	0	195

Table 7 – Housing Problems Table

Data 2011-2015 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	4,580	1,200	420	55	6,255	850	590	335	45	1,820
Having none of four housing problems	1,715	3,295	3,435	1,885	10,330	405	1,780	3,565	2,800	8,550
Household has negative income, but none of the other housing problems	370	0	0	0	370	195	0	0	0	195

Table 8 – Housing Problems 2

Data 2011-2015 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,795	1,130	380	3,305	345	410	570	1,325
Large Related	285	205	30	520	115	105	65	285
Elderly	825	635	345	1,805	380	630	465	1,475
Other	2,280	1,340	339	3,959	270	315	270	855
Total need by income	5,185	3,310	1,094	9,589	1,110	1,460	1,370	3,940

Table 9 – Cost Burden > 30%

Data 2011-2015 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	1,500	280	30	1,810	270	100	80	450
Large Related	270	40	0	310	95	35	0	130
Elderly	600	210	110	920	265	230	125	620
Other	2,055	435	4	2,494	185	205	30	420
Total need by income	4,425	965	144	5,534	815	570	235	1,620

Table 10 – Cost Burden > 50%

Data 2011-2015 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	220	130	145	29	524	20	10	49	4	83
Multiple, unrelated family households	25	35	45	0	105	0	0	20	10	30
Other, non-family households	0	35	0	0	35	0	0	0	0	0
Total need by income	245	200	190	29	664	20	10	69	14	113

Table 11 – Crowding Information – 1/2

Data 2011-2015 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

Table 12 – Crowding Information – 2/2

Describe the number and type of single person households in need of housing assistance.

According to 2015 American Community Survey (ACS) data, there are 14,455 single-person households in the City of Erie, of which 7,954 (55%) are renter households. The median income for a single-person household in 2015 was \$22,220. Given that this is approximately 65% of the City of Erie's median income, it can reasonably be assumed that there are a significant number of single person households experiencing difficulty finding affordable housing, and points to a need for additional studio and one-bedroom units. In addition, stakeholders frequently reported the anticipated need for housing and services for adults with disabilities, particularly mental health, autism and substance misuse disorders.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

There are 17,119 persons, or 17% of the City of Erie's population, who identify as having one or more disability. Among those over the age of 65, the disability rate is 39.1%. 8,541 reported an ambulatory disability, 8,443 with a cognitive disability, 6,914 with a hearing or vision difficulty, and 5,840 with an independent living difficulty. Further, service providers interviewed during the stakeholder outreach process indicated that many persons with a mental health and/or substance abuse diagnoses struggle to find affordable housing due to lack of quality units. There is no data available on the needs of victims of dating violence, sexual assault and stalking; however, stakeholder interviews suggest there are additional emergency shelter and temporary housing assistance needs for crime victims and victims of sexual assault, particularly for the LGBTQ population. Currently, victims can work with Safe Journey, Safe Net, Erie Dawn.

What are the most common housing problems?

Cost burden continues to be an issue for many households in the City of Erie. As the data above indicate, 35% of households (both renters and owners) in the City of Erie are cost-burdened. In all cases, cost burden is greatest among those earning below 50% HAMFI. In addition, poor quality units and inaccessible units continue to be common in the City of Erie.

Are any populations/household types more affected than others by these problems?

Cost burden and severe cost burden affect households across the income spectrum, though the need for affordable housing is felt most acutely by the lowest income households. The rate of cost burden declines as household income increases. Renters earning below 50% HAMFI are also more likely to be cost burdened and severely cost burdened than homeowners in this income tier. Homeowners earning 50-100% of HAMFI, though, are more likely to be cost burdened than renters in the same income tiers. Persons with physical, mental health, substance misuse and intellectual/developmental disabilities also are affected more than others.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

No specific data is available on the characteristics and needs of low-income individuals and families with children who are currently housed but are at imminent risk of homelessness. However, it can reasonably be assumed that households that are already cost-burdened and have low incomes are going to be the first to be forced from the housing market by escalating housing costs. The City of Erie reserves ESG dollars to provide rapid rehousing assistance for literally homeless individuals and families.

The City of Erie reserves ESG dollars to provide rapid rehousing assistance for literally homeless individuals and families. This assistance is typically in the form of a one-time payment (security deposit/first month rent). Ongoing rental assistance payments, supportive services to help households gain and maintain employment or other income, and other services to encourage stability were identified as needs. The Erie County Homeless Assistance Program provides homeless prevention assistance, as well as GECAC and church groups within the City of Erie, funded through other sources.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The City does not maintain an estimate of the at-risk population.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

The lowest income households are also the highest concentrations of minorities that experience challenges accessing healthcare, housing and services. There remains a strong need for decent, affordable housing. High cost housing, particularly for households living paycheck to paycheck and experiencing cost-burden, is a risk factor for households to experience homelessness. Further, overcrowding, a lack of affordable housing, and lack of job skills and transportation to work are some of the key factors in instability and an increased risk of homelessness. Substance abuse and mental health diagnoses also contribute to instability.

Discussion

The high costs of housing reduce access to opportunity for City residents, particularly those with lower incomes and disabilities. The City will continue its efforts to improve the quality of existing housing stock, while supporting efforts to assist first-time homebuyers. In addition, the City will continue to support creation of new affordable units.

The greatest needs of households currently living in public housing continue to be stable, decent living conditions and access to opportunity, in the form of employment, education, or transportation connections to neighborhood amenities. Housing Choice Voucher holders often face difficulty finding accessible units. The waiting list for the Housing Choice Voucher program contains about 1400 households and is approximately a one year wait; for Public Housing units the wait is approximately 1.5 years.

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

HUD defines a disproportionately greater housing need when a racial or ethnic group experiences housing problems at a rate over 10 percentage points than that of the corresponding income level as a whole. The data table below summarizes the percentage of each racial/ethnic group experiencing housing problems by HUD Adjusted Median Family Income (HAMFI) levels. Where the HUD tables below report AMI, they refer to HAMFI. Housing problems include:

- Housing units lacking complete kitchen facilities and/or complete plumbing facilities
- Overcrowding (more than one person per room)
- Housing costs greater than 30% of income (i.e., cost burden)

In general, the percentage of households with a housing problem is highest for the lowest income brackets (0-50% AMI) and decreases as income increases. According to the above definitions, the following household types in the City of Erie experience one or more housing problems at a disproportionate level:

- Asian households 0-30% AMI
- Black/African American households 30-50% AMI
- Asian and Hispanic households 50-80% AMI
- Asian households 80-100% AMI (note small sample size)

	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI
Racial/ Ethnic Group	% with one or more housing problems			
White	82.3%	66.9%	33.4%	12.2%
Black/ African American	92.1%	89.4%	42.3%	16.5%
Asian	96.2%	62.1%	50.0%	28.6%
Hispanic	81.0%	64.0%	58.3%	10.1%
Jurisdiction as a Whole	84.8%	70.9%	36.0%	12.9%

Source: CHAS 2011-2015

Calculations: Mullin & Lonergan Associates

ATTACHMENT K

**STRATEGY FOR ADDRESSING
HOUSING NEEDS**

Strategy for Addressing Housing Needs

Need: Shortage of affordable housing for all eligible populations

Strategy 1. Maximize the number of affordable units available to the PHA within its current resources by:

- Employ effective maintenance and management policies to minimize the number of public housing units off-line
- Reduce turnover time for vacated public housing units
- Reduce time to renovate public housing units
- Seek replacement of public housing units lost to the inventory through mixed finance development
- Seek replacement of public housing units lost to the inventory through section 8 replacement housing resources
- Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- Undertake measures to ensure access to affordable housing among families assisted by the PHA, regardless of unit size required
- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- Maintain or increase section 8 lease-up rates by effectively screening Section 8 applicants to increase owner acceptance of program
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies
- Other (list below)

Monthly monitoring of Section 8 Housing Choice voucher program to insure full program utilization within budget constraints of Section 8 contract authority.

Strategy 2: Increase the number of affordable housing units by:

- Apply for additional section 8 units should they become available
- Leverage affordable housing resources in the community through the creation of mixed-finance housing
- Pursue housing resources other than public housing or Section 8 tenant-based assistance.
- Other: (list below)

Use of Capital Funds for acquisition/development activities in the neighborhoods adjacent to HACE's eastside public housing developments.

- Each year, the Authority provides housing assistance to approximately 350 families from our public housing and Section 8 waiting lists. In addition, HACE may consider the utilization of vouchers for project-based assistance to support the City of Erie's application for funds in census tracts targeted as having high foreclosure rates, and/or to support other affordable housing initiatives with the City of Erie. This use of Section 8 vouchers would be consistent with the City of Erie's Consolidated Plan.

Need: Specific Family Types: Families at or below 30% of median

Strategy 1: Target available assistance to families at or below 30 % of AMI

- Exceed HUD federal targeting requirements for families at or below 30% of AMI in public housing
- Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance
- Employ admissions preferences aimed at families with economic hardships
- Adopt rent policies to support and encourage work
- Other: (list below)

Need: Specific Family Types: Families at or below 50% of median

Strategy 1: Target available assistance to families at or below 50% of AMI

- Employ admissions preferences aimed at families who are working
- Adopt rent policies to support and encourage work
- Other: (list below)

Need: Specific Family Types: The Elderly

Strategy 1: Target available assistance to the elderly:

- Seek designation of public housing for the elderly
- Apply for special-purpose vouchers targeted to the elderly, should they become available
- Other: (list below)

Need: Specific Family Types: Families with Disabilities

Strategy 1: Target available assistance to Families with Disabilities:

- Seek designation of public housing for families with disabilities
- Carry out the modifications needed in public housing based on the section 504 Needs Assessment for Public Housing
- Apply for special-purpose vouchers targeted to families with disabilities, should they become available
- Affirmatively market to local non-profit agencies that assist families with disabilities
- Other: (list below)

- Continue to work with advocacy groups to educate landlords about accessibility standards and to encourage participation in the Section 8 Housing Choice Voucher program.

18

Need: Specific Family Types: Races or ethnicities with disproportionate housing needs

Strategy 1: Increase awareness of PHA resources among families of races and ethnicities with disproportionate needs:

- Affirmatively market to races/ethnicities shown to have disproportionate housing needs
- Other: (list below)

Strategy 2: Conduct activities to affirmatively further fair housing

- Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentration and assist them to locate those units
- Market the section 8 program to owners outside of areas of poverty /minority concentrations
- Other: (list below)

Other Housing Needs & Strategies: (list needs and strategies below)

- HACE continues its efforts to modernize its developments and improve the desirability of its housing units in an effort to compete with the private rental market, specifically by adding air conditioning to its family units.
- HACE has obtained approval from HUD to utilize Section 8 Housing Choice Vouchers at the locally-owned, but affordable, Erie Heights development.
- Negotiate cooperation agreement with Erie County Housing Authority on expedited portability between jurisdictions.

(2) Reasons for Selecting Strategies

Of the factors listed below, select all that influenced the PHA's selection of the strategies it will pursue:

- Funding constraints
- Staffing-constraints
- Limited availability of sites for assisted housing
- Extent to which particular housing needs are met by other organizations in the community
- Evidence of housing needs as demonstrated in the Consolidated Plan and other information available to the PHA
- Influence of the housing market on PHA programs

- Community priorities regarding housing assistance
- Results of consultation with local or state government
- Results of consultation with residents and the Resident Advisory Board
- Results of consultation with advocacy groups
- Other: (list below)

ATTACHMENT L

HACE PROGRESS TOWARD FIVE-YEAR PLAN GOALS AND OBJECTIVES

ATTACHMENT L

HACE PROGRESS TOWARD FIVE-YEAR PLAN GOALS AND OBJECTIVES

The Housing Authority of the City of Erie continues to provide quality affordable housing opportunities to lower-income individuals and families, and strives to foster economic self-sufficiency among the residents it serves.

Progress made on specific strategic goals during the 2019 program year is as follows:

Increase the availability of decent, safe, and affordable housing

- During the period 10/1/20 to 9/30/21, the number of public housing units under lease has increased from 2113 units to 2115 units. As of 9/30/21, the occupancy rate for public housing units stood at 97.48%.
- HACE continued its efforts to maintain the utilization rate of the Section 8 Housing Choice Voucher Program. At 9/30/20, the number of units under contract in the Section 8 Housing Choice Voucher program was 1054 units, down from 1080 units in 2019. HACE opened the waiting list again in June of 2019 and had 1,400 applicants. HACE will continue its efforts to maintain a financial obligation rate at or above 95% during the 2021 Agency Plan year. The current obligation rate as of 9/30/2020 is 95%.
- In an effort to encourage Section 8 landlords to provide accessibility features in their rental units for person with disabilities, HACE has received HUD approval to increase Fair Market Rents for accessible units up to 120 % of the published Fair Market Rents. HACE will continue to work with advocacy groups for persons with disabilities to increase the number of accessible units available under the Section 8 program.
- HACE continues its efforts to increase the Public Housing Assessment System (PHAS) score each fiscal year. The HACE PHAS scores are as follows: (2000) – 78.6; (2001) – 78; (2002) – 83; (2003) – 84; (2004) – 86; (2005) – 81; (2006) – 79; (2007) – 77; (2008) – 79; (2009) – no score issued; (2010) – 83; (2011) – 84; (2012) – 87; (2013) – 90; (2014) – 84; (2015) – 89, (2016) – 81; (2017) – 88; (2018) - 84. The 2019 PHAS score was 80. Because of COVID-19 the HACE PHAS score from 2019 will be carried forward. (80)
- HACE continues to address its score under the Section 8 Management Assessment Program (SEMAP). Through management improvements and efforts to fully utilize the number of units available under the Section Housing Choice Voucher program, HACE received a SEMAP score of 90 in 2007, thereby achieving the distinction of being named a “High Performer” Authority. In 2008, the SEMAP score was 76. The SEMAP score that HACE received in 2009 was 81. The 2010 SEMAP score was 99 (High Performer). The 2011 SEMAP score increased to 102, (High Performer), and the 2012 SEMAP score was 97 (High Performer). HACE continued its designation as a High Performer in 2013, 2014

and 2016 with a SEMAP score of 100. In 2015, the score was 86. In 2017, 2018 and 2019 the HACE score was again designated as a High Performer with a score of 100. Because of COVID-19 the HACE SEMAP score from 2019 will be carried forward. (100)

- ❑ Renovations to improve the quality of public housing units have been undertaken under the Capital Fund grant. Projected expenditures for 2020 are included as Attachment O to this Plan.
- ❑ HACE has completed accessibility renovations on 108 units of housing for persons with disabilities. This accessible unit inventory is slightly in excess of the HUD-required 5% of the 1,858 public housing units available.
- ❑ HACE has contracted to complete a physical needs assessment (PNA) of each of its developments in 2020 to serve as a framework for a possible conversion to RAD. 2RW, a consulting firm from Maryland, will conduct assessment of all HACE developments. HACE will complete a RAD CNA of all public housing units as soon as COVID-19 protocols permit.
- ❑ In 2019, HACE updated the Emergency Operations Plans (EOP) for each of its residential housing developments and facilities. These plans comprehensively address general and specific disaster/emergency situations that may confront the Authority and its residents. The EOP for each development provides HACE with an organized approach to prevention, mitigation, continuity of operations, and recovery in an “all hazards” format. All key HACE staff were trained in the implementation of these plans.

Provide housing assistance to more families and individuals

- ❑ HACE is participating in an innovative housing program designed to assist homeless veterans through the Veteran Affairs Supportive Housing (VASH) program. Ninety (90) HUD Section 8 Vouchers, earmarked for qualified veterans, have been made available to HACE, working in cooperation with the Erie Veterans Administration Medical Center (VAMC).

The HUD-VASH program combines HUD Section 8 rental assistance for homeless veterans, with ongoing case management and clinical services provided by the Veterans Affairs at its Erie Medical Center.

The Authority has encouraged the VA to refer more veterans so that the balance of the vouchers can be utilized. As of September 2021, there were 68 units under contract out of 90, with 8 participants searching for an affordable housing unit, and 13 open slots available.

Improve community quality of life and economic vitality

- ❑ Comprehensive security improvements, including new LED security lighting installed in 2019, surveillance equipment, and community policing efforts have been implemented to provide a safe and secure living environment for all residents of public housing. HACE

just signed a 2-year contract with the City of Erie in August 2020 to continue providing targeted Community Policing in all HACE neighborhoods. As a direct result of continued HACE security efforts, reportable incidents of crime in public housing have been reduced by 73%, from 1,200 incidents in 1993 to just 321 incidents in 2019.

- HACE, in partnership with Community Health Net, opened a Family Dental Clinic in January 2013 in the John E. Horan Garden Apartments family development. The clinic is open to all ages, but targets children who are drastically underserved under the current system. The Housing Authority completed renovations to former housing units at 2120 East 10th Street to house the handicap accessible, full-time dental clinic. The Dental Clinic is staffed by a dentist, a dental hygienist, two dental assistants and an office worker. As of 8/31/2020 a total of 750 clients have been served including 166 public housing residents in 2020.
- In 2017 HACE implemented a No Smoking Policy throughout all Public Housing units.

Promote self-sufficiency and asset development of families and individuals.

- HACE continues to provide a wide range of supportive services for its residents designed to promote and support their independence and self-sufficiency.
- In December 2007, HACE initiated an Early Connections Childcare Center at the Marsha Ann Hall Learning Center. The Center is currently operating as a Preschool Program funded by the Pennsylvania Department of Education and Department of Public Welfare, in partnership with the Erie School District. The Center currently operates at its capacity of 38 children, and the service is available to public housing parents who are working or in an approved training program. An additional 24 children are served at the John E. Horan Garden Apartments Learning Center which has been open since 1995. In 2017, a total of 25 free pre-kindergarten slots became available at both sites.
- During the 2017 program year, HACE implemented the revised Violence Against Women Act amendments addressing the housing needs of victims of domestic violence, dating violence, sexual assault, and stalking. HACE shall not deny admission to the project to any applicant on the basis that the applicant is, or has been, a victim of domestic violence, dating violence, sexual assault, or stalking if the applicant otherwise qualifies for assistance under the Section 8 Housing Choice Voucher Program or admission under the Public Housing Program. In 2018 HACE partnered with SAFENET and the City of Erie Police Department to establish a Lethality Program that helps identify victims of domestic violence and get them immediate services.
- HACE has adopted a revised flat rent schedule for use at all HACE public housing developments. A review of this flat rent schedule was completed in September 2020, and was adopted by the HACE Board on October 25, 2021, in accordance with HUD program regulations.

- ❑ In support of the HACE mission to promote economic self-sufficiency of its residents, HACE constructed the Learning Center at the John E. Horan Garden Apartments, which was formally dedicated on October 18, 2002. The Multi-Cultural Resource Center (MCRC) has been contracted by HACE to provide a comprehensive adult education and job preparation program at the Learning Center. The MCRC will provide intensive case management as the cornerstone of the program that includes academic development (literacy, ABE, GED, and ESL), supervised computer education, job readiness preparation (money and time management, interpersonal skills, problem solving, and resume preparation), job development and placement.
- ❑ HACE is currently working with the prime contractors who were awarded construction contracts under the Capital Fund program to encourage the hiring of public housing residents for their work force.
- ❑ HACE initiated a Section 8 Family Self-Sufficiency program in October 2004, and has 35 participants enrolled as of September 30, 2021. To date, sixty (60) families have graduated from the program, and twenty-five (25) of these graduates have purchased their first home. In addition, fifteen (15) families have established escrow savings accounts totaling \$55,636. The sixty graduates of the program have earned a total of \$491,093.95 in escrow savings.
- ❑ HACE's ROSS Grant which funds two Family Self-Sufficiency (FSS) Coordinators to work in the two largest HACE family developments was approved in 2020. These FSS Coordinators work with residents to assess their current self-sufficiency needs and connect them with social service programs which include education and job training and development programs. They also work with the residents to establish escrow savings accounts as part of a Public Housing Self-Sufficiency program designed to create employment opportunities and to assist the resident in the purchase of their first home.

The FSS Program was implemented in September 2014, and currently has 64 active participants involved, and 61 FSS slots available. There are 43 active escrow accounts in place totaling \$191,514.27.

Ensure Equal Opportunity in Housing for all Americans

- ❑ HACE continues to be an active participant in the Mayor's Roundtable on Disabilities. This group focuses on developing a strategic plan to address the issues of homeownership opportunities, predatory lending practices, zoning barriers, and the lack of accessible rental units in the City of Erie.
- ❑ HACE will comply with the recent HUD "Equal Access Rule" which will ensure that core HACE programs are open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status.
- ❑ HACE will comply with the proposed rule regarding HUD's update of the Affirmatively Furthering Fair Housing (AFFH) process, when issued as a final rule.

ATTACHMENT M

DEFINITION OF SIGNIFICANT AMENDMENT

ATTACHMENT L

2022

HACE DEFINITION OF “SIGNIFICANT AMENDMENT” OR “SUBSTANTIAL DEVIATION/MODIFICATION”

In accordance with instruction contained in 24 CFR 903.7@ (2), the Housing Authority of the City of Erie chooses to define “significant amendment” or “substantial deviation/modification” as follows:

- Changes to rent or admission policies or organization of the waiting list.
- Addition of non-emergency work items (items not included in the current Annual Statement of Five-Year Action plan) or changes in the use of replacement reserve funds under the Capital Fund.
- Any change with regard to demolition or disposition, designation, homeownership programs or conversion activities.

As part of the Rental Assistance Demonstration (RAD), the Housing Authority of the City of Erie is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

- a. The decision to convert to either Project Based Rental Assistance or Project Based Voucher Assistance;
- b. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- c. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- d. Changes to the financing structure for each approved RAD conversion.

Any significant amendment or substantial deviation/modification to a PHA Plan is subject to the same requirements as the original PHA Plan.

HOUSING AUTHORITY OF THE CITY OF ERIE

PHA Plan Amendment

Attachment R – Rental Assistance Demonstration (RAD)

The Housing Authority of the City of Erie is amending its Annual PHA Plan because it was a successful applicant in the Rental Assistance Demonstration (RAD). As a result, the Housing Authority of the City of Erie will be converting to Project Based Rental Assistance under the guidelines of PIH Notice 2012-32, REV-1 and any successor Notices. Upon conversion to Project Based Rental Assistance the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in *For conversions to PBRA: Section 1.7.B & 1.7.C of PIH Notice 2012-32, REV-1*). These resident rights, participation, waiting list and grievance procedures are appended to this Attachment. Additionally, the Housing Authority of the City of Erie is currently compliant with all fair housing and civil rights requirements and is not under a Voluntary Compliance Agreement.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing the Housing Authority of the City of Erie with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that the Housing Authority of the City of Erie may also borrow funds to address their capital needs. Insert only if applicable: The Housing Authority of the City of Erie will also be contributing Operating Reserves in the amount of \$3.2 million and Capital Funds in the amount of \$4 million towards the conversion

Below, please find specific information related to the Public Housing Development(s) selected for RAD:

Development #1

<u>Name of Public Housing Development:</u> Harbor Homes	<u>PIC Development ID:</u> PA013000001	<u>Conversion type (i.e., PBV or PBRA):</u> PBRA	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u>
<u>Total Units:</u> 424	<u>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</u> Family	<u>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</u> Family	<u>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</u>
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	6	6	N/A
One Bedroom	54	54	N/A
Two Bedroom	89	89	N/A
Three Bedroom	148	148	N/A
Four Bedroom	97	97	N/A
Five Bedroom	30	30	N/A
Six Bedroom	0	0	N/A
<u>(If performing a Transfer of Assistance): N/A</u>	<u>(Explain how transferring waiting list) N/A</u>		

Development #2

<u>Name of Public Housing Development:</u> Lake City	<u>PIC Development ID:</u> PA013000002	<u>Conversion type (i.e., PBV or PBRA):</u> PBRA	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u>
<u>Total Units:</u> 327	<u>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</u> Family	<u>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</u> Family	<u>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</u>
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	N/A
One Bedroom	8	8	N/A
Two Bedroom	70	70	N/A
Three Bedroom	191	191	N/A
Four Bedroom	35	35	N/A
Five Bedroom	23	23	N/A
Six Bedroom	0	0	N/A
<u>(If performing a Transfer of Assistance): N/A</u>	<u>(Explain how transferring waiting list) N/A</u>		

Development #3

<u>Name of Public Housing Development:</u> John E. Horan Garden Apartments	<u>PIC Development ID:</u> PA013000003	<u>Conversion type (i.e., PBV or PBRA):</u> PBRA	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u>
<u>Total Units:</u> 491	<u>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</u> Family	<u>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</u> Family	<u>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</u>
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	N/A
One Bedroom	68	68	N/A
Two Bedroom	257	257	N/A
Three Bedroom	112	112	N/A
Four Bedroom	39	39	N/A
Five Bedroom	2	2	N/A
Six Bedroom	0	0	N/A
Non-Dwelling	13	13	N/A
<u>(If performing a Transfer of Assistance): N/A</u>	<u>(Explain how transferring waiting list) N/A</u>		

Development #4

<u>Name of Public Housing Development:</u> Pineview	<u>PIC Development ID:</u> PA013000004	<u>Conversion type (i.e., PBV or PBRA):</u> PBRA	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u>
<u>Total Units:</u> 142	<u>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</u> Family	<u>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</u> Family	<u>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</u>
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	N/A
One Bedroom	0	0	N/A
Two Bedroom	15	15	N/A
Three Bedroom	61	61	N/A
Four Bedroom	55	55	N/A
Five Bedroom	7	7	N/A
Six Bedroom	3	3	N/A
Non-Dwelling	1	1	N/A
<u>(If performing a Transfer of Assistance): N/A</u>	<u>(Explain how transferring waiting list) N/A</u>		

Development #5

<u>Name of Public Housing Development:</u> Joseph A. Schmid Towers	<u>PIC Development ID:</u> PA013000005	<u>Conversion type (i.e., PBV or PBRA):</u> PBRA	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u>
<u>Total Units:</u> 193	<u>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</u> Family	<u>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</u> Family	<u>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</u>
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	N/A
One Bedroom	193	193	N/A
Two Bedroom	0	0	N/A
Three Bedroom	0	0	N/A
Four Bedroom	0	0	N/A
Five Bedroom	0	0	N/A
Six Bedroom	0	0	N/A
<u>(If performing a Transfer of Assistance): N/A</u>	<u>(Explain how transferring waiting list) N/A</u>		

Development #6

<u>Name of Public Housing Development:</u> Friendship Apartments	<u>PIC Development ID:</u> PA013000006	<u>Conversion type (i.e., PBV or PBRA):</u> PBRA	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u>
<u>Total Units:</u> 200	<u>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</u> Family	<u>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</u> Family	<u>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</u>
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	N/A
One Bedroom	200	200	N/A
Two Bedroom	0	0	N/A
Three Bedroom	0	0	N/A
Four Bedroom	0	0	N/A
Five Bedroom	0	0	N/A
Six Bedroom	0	0	N/A
<u>(If performing a Transfer of Assistance): N/A</u>	<u>(Explain how transferring waiting list) N/A</u>		

Development #7

<u>Name of Public Housing Development:</u> Ostrow Apartments	<u>PIC Development ID:</u> PA013000006	<u>Conversion type (i.e., PBV or PBRA):</u> PBRA	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u>
<u>Total Units:</u> 80	<u>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</u> Family	<u>Post-RAD Unit Type if different (i.e., Family, Senior, etc.):</u> Family	<u>Capital Fund allocation of Development: (Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</u>
Bedroom Type	Number of Units Pre-Conversion	Number of Units Post-Conversion	Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)
Studio/Efficiency	0	0	N/A
One Bedroom	80	80	N/A
Two Bedroom	0	0	N/A
Three Bedroom	0	0	N/A
Four Bedroom	0	0	N/A
Five Bedroom	0	0	N/A
Six Bedroom	0	0	N/A
<u>(If performing a Transfer of Assistance): N/A</u>	<u>(Explain how transferring waiting list) N/A</u>		

Resident Rights, Participation, Waiting List and Grievance Procedures

The Housing Authority of the City of Erie is converting to PBRA RAD. Please see the following required attachments:

H-2019-xx/PIH 2019-xx, REV-4 Section 1.7.B & 1.7.C.

H-2016-17/PIH-2016-17

.....
Site Selection and Neighborhood Standards Review

N/A

Relocation Plans

N/A
.....

Significant Amendment Definition

If your PHA is changing its definition for substantial deviation to the PHA Plan, below find a suggested version:

As part of the Rental Assistance Demonstration (RAD), the Housing Authority of the City of Erie is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

- a. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- b. Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- c. Changes to the financing structure for each approved RAD conversion.

ATTACHMENT N

RESIDENT ADVISORY BOARD MEETING MINUTES/COMMENTS

HOUSING AUTHORITY OF THE CITY OF ERIE
FIVE-YEAR PLAN FOR FISCAL YEARS 2021 THROUGH 2025
2022 AGENCY PLAN

Housing Authority City of Erie
606 Holland Street
Erie, Pennsylvania
September 22, 2021

Resident Meeting

In Attendance:

John E. Horan Garden Apartments

Lucy Bell (RAB)

Thelma E. Smith (RAB)

Paula Thomas

Rosalie Lasanta

Beverly Dance

Housing Authority of the City of Erie

Michael R. Fraley

Dusti Dennis

Cherie Kinem

Jennifer Sheldon

Masume Przybylski

Schmid Towers

Janet Williams

Michael Grimm

Ostrow Apartments

Cynthia Rosh

Agnes Priscaro

Barnabas T. Agor

A Resident Meeting to discuss the Housing Authority of the City of Erie's (HACE) 2022 Agency Plan was convened at 6:30 p.m., Wednesday, September 22, 2021, at the John E. Horan Garden Apartments Community Center, 730 Tacoma Road.

Introduction

Michael R. Fraley, Executive Director of the Housing Authority of the City of Erie, introduced himself as well as the HACE staff in attendance and thanked everyone for coming.

COVID-19 Updates

Mr. Fraley reviewed the protocols that HACE has put in place to deal with the COVID-19 pandemic. Over the last 18 months, the housing authority has sent information to residents on testing sites, has provided for on-site vaccination clinics, and contracted with Ehrlich for additional cleaning procedures in our buildings. HACE is currently making arrangements with LECOM to provide boosters to residents and flu shots will be underway in the high-rise buildings next week.

Overview of Agency Plan

Mr. Fraley reviewed the Agency Plan process and noted that the 2022 Agency Plan will be submitted to HUD on January 14, 2022. Part of the process is to provide an overview of any policy changes. Mr. Fraley reviewed the policies HACE updated and/or added in 2021:

- Housing Choice Voucher Administrative Plan
- Public Housing Transfer Policy
- Request for Documents Policy
- EIV Policy and Procedures Manual

Mr. Fraley discussed the above and provided those in attendance with a summary sheet of these policies (a copy is attached to the minutes).

Capital Fund Expenditures – October 2020 to September 2021

Mr. Fraley reviewed the work items that have either been completed or are currently under contract and residents were provided with a list of these projects in their packet. To date, HACE has expended or awarded \$6,090,186 in capital fund projects.

Housing Authority Updates

Mr. Fraley provided the following updates:

- Flat rents – the 2022 Fair Market Rents will go to the HACE Board for approval on Monday. Each year, the housing authority reviews these rents and makes a recommendation to the Board that is based on the HUD Fair Market Rents.
- Better Housing – HACE has been awarded two PHARE Grants from the Pennsylvania Housing Finance Agency. In 2019 HACE was awarded \$200,000 that will assist the housing authority in replacing all the windows at Better Housing. In 2020, HACE was awarded an additional \$300,000 that will assist in upgrading all the electric panel boxes from 60 AMP service to 100 AMP service.
- Ellen Curry Foundation Scholarships and the John E. Horan Memorial Scholarship – HACE recently awarded scholarships to 37 children attending private school and 5 college scholarships. In addition, HACE awarded the first John E. Horan Scholarship in the amount of \$5,000.
- HAI Scholarship Recipient – HACE is pleased to announce that for the 3rd year in a row, one of our residents was the recipient of the HAI (Housing Authority Insurance) Scholarship.
- Rental Assistance Demonstration (RAD) Program Update – HACE is continuing to explore a possible conversion to RAD. We are currently undertaking RAD inspections of Phase I of our RAD application which includes Ostrow Apts., Friendship Apts., Pineview and the John Horan Garden Apts. These inspections include a physical inspection of the buildings as well as environmental testing to include radon, asbestos and lead based paint.

Needs From the Neighborhoods

- Michael Grimm (Schmid Towers) – Expressed concern about the lighting at Schmid Towers on the Holland Street side. He is also very concerned about the increase in criminal activity on the property. Mr. Fraley responded that he would get back to him next week and would also take a ride through the parking lot on his way home from the meeting tonight. Mr. Fraley also said he would have the Quebec Unit increase their visibility in the building.

- Janet Williams (Schmid Towers) – Asked if the housing authority could put a building outside of Schmid Towers for the smokers. Mr. Fraley responded that the housing authority cannot build a structure for smokers and that we had to get special permission for the current smoking shelter on property.
- Thelma Smith (JEHGA) – Expressed concern about her neighbors smoking marijuana over the weekends. Mr. Fraley advised her to call the office and provide us with addresses and we will bring these households down to sign a conference agreement. He also explained that smoking marijuana with a medical card to do so is also not permitted as it violates our No Smoking Policy.
- Cynthia Rash (Ostrow Apts) – Stated that the elevator system is often down in the high rise buildings and wanted to know what the housing authority is doing to prevent this. Mr. Fraley explained that we have a maintenance contract with Otis Elevator and that elevators are an issue throughout the city. We recently installed sensors on the elevators at Friendship to prevent the doors closing prematurely. HACE has also replaced the electronics and cables at Schmid Towers as well as many other safety repairs in all of our high rise buildings.
- Cynthia Rash (Ostrow) – Asked if we could put in larger laundry rooms in the high rises. Mr. Fraley responded that we currently have plans at Friendship to increase the size of the laundry room and are considering doing the same at Schmid.
- Barnabas Agor (Agnes Priscaro) – Stated that there is a person who has been kicked out of Agnes Priscaro that keeps coming back on to property and they are not supposed to be there. Mr. Fraley advised him to continue to call the police and let the housing authority know which residence this person is going to so that we can deal with the tenant. He also said he would have the Quebec Unit special attention this neighborhood.
- Rosalie Lasanta (JEHGA) – Stated that people are parking in the handicap parking that are not permitted to do so. Mr. Fraley said he would have the Quebec Unit look into this and ticket as appropriate.
- Rosalie Lasanta – Also commented that there are several pit bulls in the neighborhood and that some are not leashed. Mr. Fraley advised her to let the office know the address and we will deal with it.
- Rosalie Lasanta – Inquired about adding speed bumps at the John Horan Garden Apts to slow traffic down. Mr. Fraley responded that HACE cannot put speed bumps on residential streets.
- Thelma Smith - Stated that visitors on the weekends are parking on the grass. Mr. Fraley advised her to call the police.

The meeting was adjourned at 7:45 p.m.

HOUSING AUTHORITY OF THE CITY OF ERIE
FIVE-YEAR PLAN FOR FISCAL YEARS 2022 THROUGH 2026
2022 AGENCY PLAN

Housing Authority City of Erie
606 Holland Street
Erie, Pennsylvania
September 29, 2021

Resident Advisory Board Meeting

In Attendance:

John E. Horan Garden Apartments

Lucy Bell
E. Thelma E. Smith
Margaret Simms

Schmid Towers

Michael Grimm
James Kline
Eddie Mae Preston
Nancy Salazar

Ostrow Apartments

Cynthia Rosh

Friendship Apts.

Patricia Wolfe
Adrian Beliveau

Housing Authority of the City of Erie

Michael R. Fraley
Dusti Dennis
Cherie Kinem

Agnes Priscaro

Barnabas T. Agor

Lake City Dwellings

Donna Adams
Vanessa Carr

A Resident Advisory Board Meeting to discuss the Housing Authority of the City of Erie's (HACE) 2022 Agency Plan was convened at 6:30 p.m., Wednesday, September 29, 2021, in the Schmid Towers Community Room, 153 E. 6th Street.

Introduction

Michael R. Fraley, Executive Director of the Housing Authority of the City of Erie, introduced himself as well as the HACE staff in attendance and thanked everyone for coming. He then asked each of the Resident Advisory Board Members to introduce themselves.

Minutes from the September 22, 2021, Resident Meeting

Mr. Fraley reviewed the resident comments from the September 22, 2021, Resident Meeting and the follow up done to date by the housing authority.

- Concern was expressed about the lighting at Schmid Towers on the Holland Street side as well criminal activity.
 - Mr. Fraley is getting a quote from Connecto Electric to improve the lighting on the Holland Street side at Schmid and is also getting quotes for a security guard that would go between Schmid and Friendship on the weekends. Mr. Fraley has also scheduled time with the Quebec unit on Friday and Saturday nights for the next few weeks to have them accompany Cherie Kinem and Elizabeth Twohig on Friday nights and Mike Fraley and Dusti Dennis on Saturday nights at 8:30 p.m. While conducting these inspections, Mr. Fraley also noticed spalling on the balcony railings at Schmid and so he is looking into having these repaired.
- Concern was expressed regarding where tenants are smoking at Schmid Towers.
 - Mr. Fraley said notices will go out to tenants in October reminding them of our smoking policy.
- Abandoned cars at Agnes Priscaro:
 - Mr. Fraley towed 2 vehicles and tagged one more. He also asked the Quebec unit to special attention the area.
- Pit bulls on property:
 - Mr. Fraley instructed the Quebec Unit to let the housing authority know if they see dogs that don't belong in the neighborhoods.
- Illegal parking:
 - Mr. Fraley instructed the Quebec Unit to ticket people parked illegally. He also has a meeting scheduled with Sergeant Covatto on 9/30/2021 to discuss this as well as the above issues.

Overview of Agency Plan Process

Mr. Fraley reviewed the Agency Plan process and noted that the 2022 Agency Plan will be submitted to HUD on January 14, 2022. Part of the process is to provide an overview of any policy changes. Mr. Fraley reviewed the policies HACE updated and/or added in 2021:

- Housing Choice Voucher Administrative Plan
- Public Housing Transfer Policy
- Request for Documents Policy
- EIV Policy and Procedures Manual

Mr. Fraley discussed the above and provided those in attendance with a summary sheet of these policies (a copy is attached to the minutes).

Capital Fund Expenditures – October 2020 to September 2021

Mr. Fraley reviewed the work items that have either been completed or are currently under contract and residents were provided with a list of these projects in their packet. To date, HACE has expended or awarded \$6,090,186 in capital fund projects. Mr. Fraley also noted that HACE has started using a new product on the floors called Congoleum which we expect to last longer, and we have also started replacing “legacy” doors (which were very thin and easily damaged) with solid core doors.

Rental Assistance Demonstration Program (RAD)

RAB members were provided with an information packet on RAD and Mr. Fraley encouraged them to review it at their leisure. HACE is currently in the process of working with 2RW and Atlas to undertake the RAD inspections. Phase I of RAD includes the John Horan Garden Apts., Pineview, Ostrow and Friendship. Phase II of RAD will include Harbor Homes, Lake City and Schmid Towers. The RAD inspectors are looking at two things:

1. What we need to do for capital repairs
2. Environmental issues such as Lead Based Paint, Radon and Asbestos

Mr. Fraley then gave a brief overview of the RAD program and informed the RAB that HACE is studying the potential effects of RAD on HACE residents and staff before making our final decision. Once the inspections are done, we will bring the final budgets to the HACE Board as well as the RAB for review. One of the biggest changes will be for residents who currently pay flat rent as that will go away under RAD. Residents currently paying flat rent will be required to pay 30% of their income. Also, the contract rents under RAD are higher than the current flat rents. Mr. Fraley will prepare a comparison of these rents to be reviewed at the next RAB meeting.

Margaret Simms asked if there was a time frame for RAD because we have been talking about it for a few years now. Mr. Fraley said that HUD has been flexible with the time frames because of the COVID-19 pandemic.

Needs From the Neighborhoods

Cynthia Rash (Ostrow Apts) – Are we tearing up the carpeting and replacing it with the Congoleum flooring at Ostrow? Mr. Fraley said that we are but as residents move out.

Donna Adams (Lake City Scattered Site) – Asked what could be done about residents parking in the grass. She lives in a scattered site and there are some of her neighbors that are parking in the grass instead of the driveway. Mr. Fraley said the cars will be tagged and towed if they aren't moved.

Thelma Smith (JEHGA) – Asked about inoperable vehicles. Mr. Fraley responded that in the neighborhoods they will be tagged and towed. However, a single-family home is permitted one inoperable vehicle in the driveway.

James Kline (Schmid Towers) – Said when he was picking up trash the other day, another resident expressed concern about going outside because of the homeless people. Mr. Fraley advised that they call the police if there are people on housing authority property that don't belong here.

Margaret Simms (JEHGA) – Asked about putting smoking shelters in the family developments. Mr. Fraley stated we do not want smoking shelters in our neighborhoods because they will attract non-residents and only lead to problems.

Barnabas T. Agor (Agnes Priscaro) – Asked if HACE has solutions for people outside of our neighborhoods parking in our parking lots? Mr. Fraley advised him to call the police or get the license plate number and report it to the office.

Thelma Smith (JEHGA) – Asked for clarification on calling the police and whether this means the Quebec Unit. Mr. Fraley said yes, residents should call the non-emergency number (870-1125) and ask for the Quebec Unit.

With no additional questions, Mr. Fraley thanked everyone for attending and the meeting was adjourned at 7:40 p.m.

HOUSING AUTHORITY OF THE CITY OF ERIE
FIVE-YEAR PLAN FOR FISCAL YEARS 2022 THROUGH 2026
2022 AGENCY PLAN

Housing Authority City of Erie
606 Holland Street
Erie, Pennsylvania
October 13, 2021

Resident Advisory Board Meeting

In Attendance:

John E. Horan Garden Apartments

Lucy Bell
E. Thelma E. Smith
Margaret Simms

Housing Authority of the City of Erie

Michael R. Fraley
Dusti Dennis
Cherie Kinem

Schmid Towers

Michael Grimm
James Kline
Eddie Mae Preston
Nancy Salazar

Agnes Priscaro

Barnabas T. Agor

Ostrow Apartments

Cynthia Rash
Rose Brooks

Lake City Dwellings

Donna Adams
Vanessa Carr

Friendship Apts.

Patricia Wolfe
Adrian Beliveau

Harbor Homes

Michou Ntambwe
Joanne Ruiz-Quinones

A Resident Advisory Board Meeting to discuss the Housing Authority of the City of Erie's (HACE) 2022 Agency Plan was convened at 6:30 p.m., Wednesday, October 13, 2021, in the Schmid Towers Community Room, 153 E. 6th Street.

Introduction

Michael R. Fraley, Executive Director of the Housing Authority of the City of Erie, introduced himself as well as the HACE staff in attendance and thanked everyone for coming. He then asked each of the Resident Advisory Board Members to introduce themselves.

Minutes from the September 29, 2021, Resident Meeting

Minutes from the September 29, 2021, Resident Advisory Board Meeting were distributed to the members in advance of the meeting and changes were made based on resident comments. With

no further comments on the meeting minutes Mr. Fraley asked for a motion to approve. Mr. Beliveau made a motion to approve, and Ms. Wolfe seconded. The motion passed unanimously.

Mr. Fraley went off the agenda briefly to discuss a few items:

1. The Whole Food Co-Op that is going in downtown will be an asset to the residents of Schmid and Friendship as there are currently no grocery stores in the downtown area to get fresh produce. Mr. Fraley met with the Erie Downtown Development Corporation (EDDC) to discuss how the Co-Op will benefit the HACE residents in the downtown area. He said a soft opening will be scheduled for the residents of Schmid and Friendship and HACE will arrange transportation. He has also discussed with the EDDC sharing in the cost of the membership fee. A lifetime membership to the Co-Op will be \$100. HACE will contribute \$50, the EDDC will contribute \$25, and the residents will then contribute \$25.
2. HACE is posting a Request for Proposals (RFP) for a Security Guard at Schmid and Friendship for Friday and Saturday nights. The guard would travel between the two buildings and submit reports to Cherie Kinem every Monday for follow up.
 - a. Eddie Mae Preston (Schmid Towers) – asked if they would be stationed at both entrances at Schmid. Mr. Fraley said they would not be seated in one location but walking throughout both buildings.

2021 Capital Fund Annual Statement

Mr. Fraley reviewed the 2021 Capital Fund Annual Statement; these are the items we want to do this year through our capital fund grant. HACE received \$5.2; we have 3 years to obligate these funds and 2 additional years to expend these funds. HUD has given housing authorities an additional one year to expend due to additional challenges faced because of the COVID-19 pandemic. HACE staff will be meeting Monday to discuss the 2022 Capital Fund Grant and will have a draft budget to review with the board on October 20th.

Thelma Smith (JEHGA) – asked if we are replacing the sliding doors with the same thing at Friendship? Mr. Fraley responded that we are replacing the doors with new sliding doors.

Patty Wolfe (Friendship) – asked why her side of the building hasn't had the balcony repairs yet? Mr. Fraley stated that we are doing these repairs in phases and that her side of the building will be done over the next few years.

Joanne Ruiz-Quinones (Harbor Homes) – asked if the Congoleum flooring in all of the units. Mr. Fraley said that eventually yes, as tenants move out all flooring will be replaced with the Congoleum flooring.

Lucy Bell (JEHGA) – Asked if her bathroom floor was going to be changed? Mr. Fraley said it would not as her floor is newer. She also said that her kitchen floor and exterior ramp are beginning to crack. Mr. Fraley told her to call the office.

Mr. Fraley encouraged the RAB members to review the budgets before the next meeting.

2021 – 2025 Capital Fund Five Year Plan

Mr. Fraley said a copy of the 2021 – 2025 Capital Fund Five Year Plan is included in everyone's packet. He reviewed some of the items that have been done as well as those planned for the future.

Rental Assistance Demonstration Program (RAD)

Mr. Fraley provided an overview of the RAD program and how funding works. He discussed the impact on our residents, which is as follows:

- Tenant portion of rent is still based on 30% of household income.
- After 2 years in the RAD program, tenants can exercise Choice Mobility, which means they can choose to go to the Section 8 program and would go to the top of the list.
- Permissive deductions which are provided to working families would no longer be permitted.
- Earned Income Disregard would go away.

Thelma Smith (JEHGA) asked if this is something housing authorities across the nation are doing and if so, what will happen to HUD? Mr. Fraley responded that yes, this is a nationwide initiative and further explained that the funding would still come from HUD so they would not go away.

Mr. Fraley said that HACE is still reviewing whether RAD will work for our authority. He also informed the RAB that HACE could choose which properties might be appropriate for RAD and only convert a portion of the public housing properties.

Mr. Fraley then briefly touched on the over and underhoused residents. HACE is currently working on correcting occupancy issues. We are currently focusing on 1 person households who reside in 3-, 4-, and 5-bedroom units and downsizing them to a 1 bedroom. He explained that HUD directs housing authorities to correct occupancy issues.

Needs From the Neighborhoods

Lucy Bell (JEHGA) – asked about additional exterior lighting at JEHGA on the Franklin Ave. side similar to what the 2-story buildings have. Mr. Fraley said he would look into this and will add it to the 5-year plan.

Rose Brooks (Ostrow) – asked when HACE would be installing security screens on the 1st floor at Ostrow Apartments? Mr. Fraley said he would check with Iluminada Rivera on this.

Adrian Beliveau (Friendship) – asked if Friendship is getting a new mailroom as a lot of residents are complaining of having packages stolen? Mr. Fraley said that HACE is working with Roth Marz Architects on a design that will be convenient for the mailman and the tenants.

With no additional questions, Mr. Fraley thanked everyone for attending and the meeting was adjourned at 7:40 p.m.

Patty Wolfe (Friendship) – said the staff at Friendship told people that they cannot sit on the benches outside of the smoking shelter to smoke. Mr. Fraley said that this is correct, smoking is only permitted in the designated smoking areas.

Donna Adams (L.C. Scattered Site) – asked if other housing authorities have single family homes like ours or if they only have high-rises? Mr. Fraley said there are others like ours that have single family homes.

With no further comments, Mr. Fraley thanked everyone for coming and said that at the next meeting we would be reviewing the draft. The next meeting of the Resident Advisory Board is scheduled for Wednesday, October 20th at 6:30 p.m. in the Schmid Towers Community Room. The meeting adjourned at 7:40 p.m.

HOUSING AUTHORITY OF THE CITY OF ERIE
FIVE-YEAR PLAN FOR FISCAL YEARS 2022 THROUGH 2026
2022 AGENCY PLAN

Housing Authority City of Erie
606 Holland Street
Erie, Pennsylvania
October 20, 2021

Resident Advisory Board Meeting

In Attendance:

John E. Horan Garden Apartments

Lucy Bell
E. Thelma E. Smith
Margaret Simms

Schmid Towers

Nancy Salazar
James Kline
Eddie Mae Preston

Ostrow Apartments

Cynthia Rash
Rose Brooks

Housing Authority of the City of Erie

Michael R. Fraley
Dusti Dennis
Linda Lewis

Agnes Priscaro

Barnabas T. Agor

Harbor Homes

Joanne Ruiz-Quinones

A Resident Advisory Board Meeting to discuss the Housing Authority of the City of Erie's (HACE) 2022 Agency Plan was convened at 6:30 p.m., Wednesday, October 20, 2021, in the Schmid Towers Community Room, 153 E. 6th Street.

Introduction

Michael R. Fraley, Executive Director of the Housing Authority of the City of Erie opened the meeting and thanked everyone for coming. He explained that this is the last of three resident advisory board meetings for the 2022 Agency Plan.

Minutes from the October 13, 2021, Resident Meeting

Minutes from the October 13, 2021, Resident Advisory Board Meeting were included in everyone's packet. Mr. Fraley asked if there were any changes in the minutes, with no comments from the RAB, Mr. Fraley asked for a motion to approve. Ms. Bell made a motion to approve, and Mr. Kline seconded. The motion passed unanimously.

Mr. Fraley then reviewed the follow up that has been done to items that have been discussed at previous meetings:

1. Schmid Towers – Spaeder Plumbing and Heating has been changing the check valves throughout the building to eliminate having to shut off the entire building during repairs. As a result, there has been disruption to the hot water in the building and HACE is continuing to work with Spaeder to resolve this issue. HACE is now also replacing all of the bathroom faucets that haven't already been updated. The boilers that heat the building are also being replaced and the temporary boiler has been installed to make sure that the building has heat until the new boilers are installed. Mr. Fraley has also contacted Connecto for suggestions on exterior lighting.
2. Ostrow Apts. - Screens for the first floor will have to be designed.
3. Friendship Apts. – A new mailroom is being designed by the HACE architect.

2022 Capital Fund Annual Statement

Mr. Fraley reviewed the proposed budget lines items for the \$5.2 million 2022 Capital Fund grant will be expended. The largest amount allocated will be to dwelling structures, over \$3 million is budgeted. These are the work items that Mr. Fraley focused on most in reviewing the budget. He also said that HACE has made a commitment to use more quality products. Mr. Fraley then reviewed the projects for each AMP group.

Needs From the Neighborhoods

Barnabas T. Agor (Agnes Priscaro) – Said that his window is very difficult to operate. Mr. Fraley said he would send Kevin McGregor over to inspect. He also said that he has concerns with the flooring and painting.

- Mr. Agor also said that there many non-residents using the playground and could we put signs up “For Tenants Only”? Mr. Fraley said we could but that it would be unenforceable. He also said that if there are older kids not from the neighborhood causing problems, to call the police.

Cynthia Rash (Ostrow) – asked if the tubs could be reglazed throughout the building. Mr. Fraley said he would look into it.

Rose Brooks (Ostrow) – said her floor is very hard to clean and always looks dirty. Mr. Fraley said he would send Joe Lassman over to inspect the floor.

Joanne Ruiz-Quinones (Harbor Homes) – asked about upgrading security cameras at Harbor Homes because her car was hit a few years ago and the police said the cameras were not working. Mr. Fraley said there is no plan to replace the existing cameras and that they all seem to be working fine. The hit and run could have occurred in a blind spot.

Thelma Smith (JEHGA) – asked if a resident who has a nice car that they don't want to drive in the winter months could park it and cover it. Mr. Fraley said he would think about it and get back to her.

- She also asked why there is a huge price discrepancy between what her daughter pays for cable in Summit Township and what she pays in the city? Mr. Fraley said he was not surprised but also said that HACE is looking into having fiber installed in the neighborhoods through Velocity. This could potentially provide a cost savings to the residents if they switch to Velocity as their cable provider.

Lucy Bell (JEHGA) – said that the railing on her ramp is loose. Mr. Fraley said he would have Steve Bernhardt look at it but that she should also call it into the work order number.

With no further comments, Mr. Fraley thanked everyone for coming and said that HACE will now put the plan together by next Friday. Copies will then be delivered to all the Resident Advisory Board Members. The Public Hearing is scheduled for December 15, 2021, at the John Horan Garden Apartments at 6:30 p.m. HACE will submit the plan to the Board for approval on December 20, 2021, and on January 14, 2022, it will be submitted to the Department of Housing & Urban Development. The meeting adjourned at 7:36 p.m.

ATTACHMENT O

**2022 AGENCY PLAN
ANNUAL STATEMENT**

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program 2022

Part I: Summary

PHA Name: Housing Authority of the City of Erie
Grant Type and Number: Capital Fund Program Grant No: PA28 P013 501-22
Date of CFFP: _____ **Replacement Housing Factor Grant No:** _____
FFY of Grant: 2022
FFY of Grant Approval: _____

Type of Grant
 Original Annual Statement
 Performance and Evaluation Report for Period Ending: _____
Reserve for Disasters/Emergencies _____ Revised Annual Statement (revision no:)
Final Performance and Evaluation Report _____

Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost (1)	
		Original	Revised(2)	Obligated	Expended
1	Total Non-CFP Funds	0	0	0	0
2	1406 Operations (may not exceed 25% of line 20)	1,308,498	0	0	0
3	1408 Management Improvements	0	0	0	0
4	1410 Administration (may not exceed 10% of line 20)	523,399	0	0	0
5	1480 General Capital Activity	3,402,097	0	0	0
6	1492 Moving to Work Demonstration	0	0	0	0
7	1501 Collateralization or Debt Service paid by the PHA	0	0	0	0
8	1503 RAD-CFP	0	0	0	0
9	1504 RAD Investment Activity	0	0	0	0
10	1505 RAD-CPT	0	0	0	0
11	9000 Debt Reserves	0	0	0	0
12	9001 Bond Debt Obligation paid Via System of Direct Payment	0	0	0	0
13	9002 Loan Debt Obligation paid Via System of Direct Payment	0	0	0	0
14	9900 Post Audit Adjustment	0	0	0	0
15	Amount of Annual Grant: (sum of lines 2-19)	5,233,994	0	0	0
16	Amount of line 20 Related to LBP Activities	0	0	0	0
17	Amount of line 20 Related to Section 504 Activities and Fair Hsg Act Activities	0	0	0	0
18	Amount of line 20 Related to Security - Soft Costs	811,677	0	0	0
19	Amount of line 20 Related to Security - Hard Costs	345,800	0	0	0
20	Amount of line 20 Related to Energy Conservation Measures	162,500	0	0	0

(1) To be completed for the Performance and Evaluation Report.
(2) To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
(3) PHAs with under 250 units in management may use 100% of CFP Grants for operations.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program 2022

U. S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0157
 Expires 11/30/2023

Part I: Summary		Grant Type and Number		FFY of Grant:	
PHA Name: Housing Authority of the City of Erie		Capital Fund Program Grant No: PA28 P013 501-22 Replacement Housing Factor Grant No: _____		____ 2022	
Date of CFFP: _____		Reserve for Disasters/Emergencies		FFY of Grant Approval:	
Type of Grant		_____		____ Revised Annual Statement (revision no:)	
X Original Annual Statement		_____		____ Final Performance and Evaluation Report	
Performance and Evaluation Report for Period Ending:		_____		_____	
Line		Summary by Development Account		Total Actual Cost (1)	
		Original		Expended	
		Revised(2)		Obligated	
Signature of Executive Director		Signature of Public Housing Director		Date	

* I certify that the information provided on this form and in any accompanying documentation is true and accurate. I acknowledge that making, presenting, or submitting a false, fictitious, or fraudulent statement, representation, or certification may result in criminal, civil, and/or administrative sanctions, including fines, penalties, and imprisonment.

- (1) To be completed for the Performance and Evaluation Report.
- (2) To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
- (3) PHAs with under 250 units in management may use 100% of CFP Grants for operations.

Part II: Supporting Pages											
PHA Name:		Housing Authority of the City of Erie				Grant Type and Number Capital Fund Program Grant No: PA28 P013 501-22				Federal FFY of Grant: 2022	
Development Number Name/PHA-Wide Activities		General Description of Major Work Work Categories				Replacement Housing Factor Grant No:		Total Estimated Cost		Total Actual Cost	
		Account No.		Quantity		Original		Revised (1)		Funds Obligated (2)	
										Funds Expended (2)	
										Status of Work	
PA013-000001 AMP Group #1 Harbor Homes (224 units)	Renovate Bathrooms	1480		50 units	200,000						
	Renovate Administrative Office Area	1480		lump sum	120,000						
	Replace Stoops and Handrails	1480		20 units	100,000						
Harbor Homes Annex (121 units)	Replace Roofing Shingles and Vent Pipes	1480		13 bldgs	169,000						
	Siding Replacement	1480		14 bldgs	150,000						
	Exterior Painting	1480		14 bldgs	80,000						
	Replace Main Water Shut-off Valves in Apartments	1480		121 units	12,100						
Scattered Sites (13-7) (9 units)	Replace Roofs	1480		9 units	85,000						
Scattered Sites (13-8) (68 units)											
Subtotal of Estimated Costs						916,100	0	0	0	0	0

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 (2) To be completed for the Performance and Evaluation Report.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program 2022

U. S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 11/30/2023

Part II: Supporting Pages												
PHA Name:		Housing Authority of the City of Erie		Grant Type and Number				Capital Fund Program Grant No: PA28 P013 501-22		CFFP (Yes/No):		Federal FFY of Grant:
Development Number Name/PHA-Wide Activities		General Description of Major Work Work Categories		Development Account No.		Quantity		Total Estimated Cost		Total Actual Cost		Status of Work
								Original	Revised (1)	Funds Obligated (2)	Funds Expended (2)	
PA013-000001 AMP Group #1												
	Fees & Costs						lump sum	36,319				
	Architect & Engineering Fees	1480										
	Administration						lump sum	119,505				
	Management Fee	1410										
	Operations											
	Community Oriented Police Services	1406					4 officers	292,770				
	Economic Development	1406					lump sum	10,000				
	Subtotal of Estimated Costs							458,594		0	0	
	Grand Total for AMP Group #1							1,374,694		0	0	

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Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program 2022

U. S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 11/30/2023

Part II: Supporting Pages		Housing Authority of the City of Erie		Grant Type and Number			Capital Fund Program Grant No: PA28 P013 501-22		FFFP (Yes/No):		Federal FFY of Grant:	
PHA Name:		Housing Authority of the City of Erie		Replacement Housing Factor Grant No:			PA28 P013 501-22		CFFP (Yes/No):		2022	
Development Number Name/PHA-Wide Activities	General Description of Major Work Work Categories	Development Account No.	Quantity	Total Estimated Cost		Revised (1)	Total Actual Cost		Status of Work			
				Original	Funds Obligated (2)		Funds Expended (2)					
PA013-000002 AMP Group #2 Scattered Sites (13-2) (40 units)	Replace Roofs, Gutters and Downspouts	1480	5 bldgs	150,000								
	Insulate Exterior Walls and Attic	1480	5 bldgs	120,000								
	Replace Kitchen Cabinets	1480	40 units	100,000								
	Replace Water Mains in Apts and Shut-off Valves	1480	1 bldg	70,000								
	Replace Security Screens	1480	40 units	20,000								
Eastbrook (13-10) (50 units)	Resurface Parking Lots	1480	lump sum	50,000								
	Replace Bathroom Exhaust Fans	1480	50 units	42,500								
	Exterior Painting	1480	8 bldgs	30,000								
Scattered Sites (13-7) (61 units)	Replace Roofs	1480	5 units	35,000								
Scattered Sites (13-8) (97 units)												
Scattered Sites (13-17) (32 units)												
Scattered Sites (13-18) (47 units)												
Subtotal of Estimated Costs				617,500	0	0	0	0				

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Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program 2022

U. S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 11/30/2023

Part II: Supporting Pages										
PHA Name:		Housing Authority of the City of Erie			Grant Type and Number Capital Fund Program Grant No: PA28 P013 501-22			CFFP (Yes/No):		Federal FFY of Grant: 2022
Development Number Name/PHA-Wide Activities	General Description of Major Work Work Categories	Replacement Account No.	Quantity	Total Estimated Cost		Revised (1)	Total Actual Cost		Status of Work	
				Original			Funds Obligated (2)	Funds Expended (2)		
PA013-000004 AMP Group #4 Priscaro Apartments (13-9) (53 units)	Install Security Screens	1480	lump sum	180,300						
	Exterior Painting	1480	22 bldgs	80,000						
Pineview (13-14) (68 units)	Exterior Painting	1480	2 bldgs	170,000						
	Replace Stair Treads & Stringers	1480	34 units	68,000						
	Replace Bathroom Vanities	1480	68 units	60,000						
	Replace Roofs	1480	2 bldgs	24,000						
Scattered Sites (13-8) (10 units)										
Scattered Sites (13-7) (8 units)	Replace Siding	1480	8 units	56,000						
	Replace Roofs	1480	8 units	56,000						
Scattered Sites (13-18) (3 units)	Replace Siding	1480	3 units	21,000						
	Replace Roofs	1480	3 units	21,000						
Subtotal of Estimated Costs					736,300					

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Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program 2022

U. S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 11/30/2023

Part II: Supporting Pages																			
PHA Name:		Housing Authority of the City of Erie			Grant Type and Number Capital Fund Program Grant No: PA28 P013 501-22				CFFP (Yes/No):		Federal FFY of Grant:								
		Replacement Housing Factor Grant No:			Development Account No.		Quantity		Total Estimated Cost		Total Actual Cost		2022						
Development Number Name/PHA-Wide Activities		General Description of Major Work Work Categories							Original		Revised (1)		Funds Obligated (2)		Funds Expended (2)		Status of Work		
PA013-000005 AMP Group #5 Schmid Towers (193 units)	Replace Roof			1480	lump sum	190,000													
	Replace Kitchen and Bathroom Plumbing Fixtures			1480	139 units	140,000													
	Repair Concrete Spalls			1480	lump sum	60,000													
	Resurface Parking Areas			1480	lump sum	55,000													
		Subtotal of Estimated Costs					445,000		0				0		0				

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Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program 2022

U. S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 11/30/2023

Part II: Supporting Pages										
PHA Name:		Housing Authority of the City of Erie			Grant Type and Number Capital Fund Program Grant No: PA28 P013 501-22			CFFP (Yes/No):		Federal FFY of Grant:
Development Number Name/PHA-Wide Activities		General Description of Major Work Work Categories		Replacement Housing Factor Grant No:	Total Estimated Cost		Total Actual Cost		Status of Work	
		Account No.	Quantity	Original	Revised (1)	Funds Obligated (2)	Funds Expended (2)			
PA013-000005 AMP Group #5 Schmid Towers (193 units)		1480	lump sum	17,642						
		1410	lump sum	54,397						
		1406	4 officers	32,549						
		1406	193 residents	238,542						
Subtotal of Estimated Costs				343,130	0	0	0			
Grand Total for AMP Group #5				788,130	0	0	0			

(1) To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

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 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program 2022

U. S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 11/30/2023

Part II: Supporting Pages										
PHA Name:		Housing Authority of the City of Erie			Grant Type and Number Capital Fund Program Grant No: PA28 P013 501-22			CFFP (Yes/No):		Federal FFY of Grant: 2022
Development Number Name/PHA-Wide Activities	General Description of Major Work Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work		
				Original	Revised (1)	Funds Obligated (2)	Funds Expended (2)			
PA013-000006 AMP Group #6 Friendship (200 units)	Replace Mailboxes and Remodel Mail Area	1480	lump sum	100,000						
	Replace Kitchen Cabinets (UFAS Units)	1480	10 units	70,000						
	Renovate/Expand Laundry Room	1480	lump sum	50,000						
	Replace Door Closures	1480	35	17,500						
Subtotal of Estimated Costs				237,500	0	0	0	0		

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Part II: Supporting Pages										
PHA Name:		Housing Authority of the City of Erie		Grant Type and Number Capital Fund Program Grant No: PA28 P013 501-22			CFFP (Yes/No):		Federal FFY of Grant: 2022	
Development Number Name/PHA-Wide Activities		General Description of Major Work Work Categories		Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
						Original	Revised (1)	Funds Obligated (2)	Funds Expended (2)	
PA013-000006 AMP Group #6 Friendship (200 units)		Fees & Costs								
		Architect & Engineering Fees		1480	lump sum	9,417				
		Administration								
		Management Fee		1410	lump sum	56,371				
		Operations								
		Community Oriented Police Services		1406	4 officers	43,669				
		HomePLUS Social Services at Friendship Apartments		1406	193 residents	248,279				
		Subtotal of Estimated Costs				357,736	0	0	0	
		Grand Total for AMP Group #6				595,236	0	0	0	

(1) To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
(2) To be completed for the Performance and Evaluation Report.

**Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program 2022**

U. S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 11/30/2023

Part II: Supporting Pages											
PHA Name:		Housing Authority of the City of Erie		Grant Type and Number Capital Fund Program Grant No: PA28 P013 501-22			CFFP (Yes/No):		Federal FFY of Grant: 2022		
Development Number Name/PHA-Wide Activities	General Description of Major Work Work Categories	Replacement Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work			
				Original	Revised (1)	Funds Obligated (2)	Funds Expended (2)				
PA013-000007 AMP Group #7 Ostrow Apartments (80 units)											
	Subtotal of Estimated Costs				0	0	0	0	0	0	

(1) To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
 (2) To be completed for the Performance and Evaluation Report.

Part II: Supporting Pages		Grant Type and Number		CFFP (Yes/No):		Federal FFY of Grant:	
PHA Name:		Capital Fund Program Grant No: PA28 P013 501-22		CFFP (Yes/No):		2022	
Housing Authority of the City of Erie		Replacement Housing Factor Grant No:		Total Estimated Cost		Total Actual Cost	
Development Number/PHA-Wide Activities	General Description of Major Work Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost	
				Original	Revised (1)	Funds Obligated (2)	Funds Expended (2)
PA013-000007 AMP Group #7 Ostrow Apartments (80 units)	Fees & Costs						
	Architect & Engineering Fees	1480	lump sum	1,000			
	Administration						
	Management Fee	1410	lump sum	22,548			
	Operations						
	Community Oriented Police Services	1406	4 officers	19,968			
Subtotal of Estimated Costs				43,516	0	0	0
Grand Total for AMP Group #7				43,516	0	0.00	0.00
Grand Total for All AMPs				5,233,994	0	0.00	0.00

(1) To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
(2) To be completed for the Performance and Evaluation Report.