

# HOUSING AUTHORITY OF THE CITY OF CARROLLTON

## FY2015 - FY2019 FIVE-YEAR AGENCY PLAN AND FY2015 ANNUAL UPDATE

### SECTION 5.0 THROUGH 10.0

#### TABLE OF CONTENTS

#### **5.0 Five-Year Plan**

5.1	Mission Statement	1
5.2	Goals and Objectives	1

#### **6.0 PHA Plan Update**

(a.)	Revised Elements Since Last Submittal	4
(b.)	Address Where Agency Plan Can Be Reviewed	4
1.	Eligibility, Selection and Admissions Policies	5
2.	Financial Resources	22
3.	Rent Determination Policies	22
4.	Operations and Management Policies	24
5.	Grievance Procedures	24
6.	Designated Housing for Elderly and Disabled Families	36
7.	Community Service and Self-Sufficiency	36
8.	Safety and Crime Prevention	37
9.	Pets	38
10.	Civil Rights Certifications	42
11.	Fiscal Year Audit	42
12.	Asset Management	42
13.	Violence Against Women Act	43

**7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-Based Vouchers**

(a)	Hope VI or Mixed Finance Modernization or Development	43
(b)	Demolition and/or Disposition	43
(c)	Conversion of Public Housing	43
(d)	Homeownership	44
(e)	Project-based Vouchers	44

**8.0 Capital Improvements**

8.1	FY2015 Capital Fund Annual Statement/P and E Reports	44
8.2	Capital Fund Five-Year Plan	44
8.3	Capital Fund Financing Program	44

**9.0 Housing Needs**

9.1	Strategies for Addressing Needs	46
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**10.0 Other Information**

(a)	Substantial Deviation and Significant Amendment	48
(b)	Memorandum of Agreement	49
(c)	Resident Advisory Board Comments	49
(d)	Challenged Elements	49
(e)	Off-Line Apartments	49
(f)	Rental Assistance Demonstration Program Information	49

## **5.0 Five-Year Plan**

### **5.1 Mission Statement**

The *Housing Authority of the City of Carrollton* is committed to be a leader in providing affordable housing for very-low, low, and moderate-income persons through effective management, wise stewardship of public funds and partnerships with our residents and others to enhance the quality of life in our communities.

### **5.2 Goals and Objectives**

The Authority operates three main housing programs which include the Public Housing Program, Housing Choice Voucher Program and Little River Private Housing Program. In addition, the Authority operates two smaller housing programs which include Shelter Plus Care and Veterans Affairs Supportive Housing. The Housing Authority also offers many resident service programs to help in efforts for residents to become self-sufficient. A description of each of the housing programs is included below. A description of the various resident services programs can be found in Section 7 of 6.0.

#### *Public Housing Program*

Public housing was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities. Public housing comes in all sizes and types, from scattered single family houses to high-rise apartments for elderly families. Across the nation, there are approximately 1.2 million households living in public housing units, managed by some 3,300 public housing agencies. The U.S. Department of Housing and Urban Development (HUD) administers Federal aid to local housing agencies that manage the housing for low-income residents at rents they can afford. HUD furnishes technical and professional assistance in planning, developing and managing these developments.

Locally, the Housing Authority of the City of Carrollton manages five public housing properties with a total of 234 apartments. The five properties are Griffin Homes, Ingram Homes, Thomas Homes, Elder Circle and Alabama Circle.

Entrance into the Public Housing Program is based on eligibility using a series of factors which include meeting income limits, being a U.S. citizen or eligible immigrant and passing a criminal background check.

#### *Housing Choice Voucher Program*

The Housing Choice Voucher Program is the federal government's major program for assisting very low-income families, the elderly, and the disabled with finding affordable, decent, safe, and sanitary housing in the private rental market. Since housing assistance is provided on behalf of the family or individual, participants are able to find their own

housing, including single-family homes, townhouses and apartments. The participant is free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects.

A family that is issued a housing voucher is responsible for finding a suitable housing unit of the family's choice where the owner agrees to rent under the program. Rental units must meet minimum standards of health and safety, as determined by the Housing Authority.

A housing subsidy is paid to the landlord directly by the PHA on behalf of the participating family. The family then pays the difference between the actual rent charged by the landlord and the amount subsidized by the program.

#### *Little River Private Housing*

The Housing Authority offers two and three bedroom duplexes and single family homes for rent at an affordable rate and with little to no wait. The rents range from \$350 to \$550 depending on the size and location of the unit.

To qualify for these units, a potential tenant must come into the office and complete a pre-application. The application process is as follows: criminal background check on anyone 18 years of age and older, verification of the past five years of residency, and a credit check. We also require copies of Photo ID, Social Security Cards, Birth Certificates, and Verification of household income.

#### *Shelter Plus Care*

Shelter Plus Care (S+C) is designed to provide housing and supportive services on a long-term basis for homeless persons with disabilities (primarily those with serious mental illness, chronic problems with alcohol and/or drugs, and acquired immunodeficiency syndrome (AIDS) or related diseases) and their families who are living in places not intended for human habitation (e.g., streets) or in emergency shelters. The program allows for a variety of housing choices, and a range of supportive services funded by other sources, in response to the needs of the hard-to-reach homeless population with disabilities.

#### *HUD-VASH*

HUD-VASH is a long term case management, supportive services, and permanent housing support program for chronically homeless Veterans who require these supports to live independently. The program is funded through a partnership between the U.S. Department of Housing and Urban Development (HUD) and the Department of Veteran's Affairs (VA). The VA staff provides case management services designed to resolve current homelessness and prevent future episodes of homelessness. HUD funds the HCV rental assistance program, which enables the Veteran to obtain affordable housing. The voucher program is administered through the Authority's Housing Choice Voucher Program.

Based on the current state of the Authority's operation including management, physical assets and clientele, the Executive Director and staff have decided to focus on the following Goals over the next five years. Under each Goal there are specific Objectives which will help the Authority achieve that Goal.

*Goal #1 – Operate all Programs in an Effective Manner*

*Objectives:*

- Maintain High Performing status on the Public Housing Assessment System (PHAS).
- Maintain High Performing status on the Section 8 Management Assessment System (SEMAP)
- Continue to maintain a high level of customer satisfaction
- Provide employee training on an as-needed basis

*Goal #2 – Maintain Physical Assets*

*Objectives:*

- Conduct a Physical Needs Assessment of all public housing properties
- Develop a systematic approach for renovation of public housing properties

*Goal #3 – Expand the Supply of Assisted Housing*

*Objectives:*

- Apply for additional rental vouchers as they become available
- Construct affordable housing on vacant land currently owned by the Authority
- Partner with local developers or other entities to create affordable housing
- Purchase and renovate dilapidated residential properties and convert to affordable housing

*Goal #4 – Promote Self-Sufficiency*

*Objectives:*

- Implement homeownership program(s)
- Provide educational opportunities to program participants to increase employability
- Provide or attract supportive services to improve assistance recipients' employability
- Provide or attract supportive services to increase independence for the elderly or families with disabilities.

**6.0 PHA Plan Update**

**(a) Identify specifically which plan elements have been revised since the PHA's prior plan submission.**

The Agency Plan is a comprehensive guide to the Carrollton Housing Authority's policies, programs, operations and strategies for meeting local housing needs and goals. There are two parts to the Plan: the Five-Year Plan, which the Authority submits to the Department of Housing and Urban Development (HUD) once every fifth fiscal year, and the Annual Plan, which is submitted to HUD every year. This document represents the Authority's FY2015 - FY2019 Five-Year Agency Plan and FY2015 Annual Update.

Although the Capital Fund Plan is now submitted separately from the Agency Plan, the Authority has decided to include the FY2015 Annual Statement and Five-Year Plan with the FY2015 Agency Plan. The Annual Statement and Five-Year Plan can be found in this binder under Tab 2 (ga116a01).

The Housing Authority has revised all elements since the last submission.

**(b) Identify where the 5-Year and Annual Plan may be obtained by the public.**

The FY2015 – FY2019 Five-Year Agency Plan will be available for review during the 45-day Public Hearing Notice period at the Carrollton Housing Authority's Main Office which is located at 1 Roop Road in Carrollton, Georgia.

1. **Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures**

**Public Housing**

**Eligibility**

1. The Housing Authority shall use the guidelines and procedures prescribed by HUD at the time of applicant processing to make a final determination of household eligibility.
2. All families who are admitted to Public Housing must be individually determined eligible under the terms of this policy. In order to be determined eligible, an applicant family must meet ALL of the following requirements:
  - a. The applicant family must qualify as a family as defined by HUD. **(The Authority has revised the Definition of a Family to meet the requirements of 24 CFR 5.403.)**
  - b. The single person applicant must qualify as a single person as defined by HUD.
  - c. The applicant's Annual Income as defined by HUD must not exceed income limits established by the Department of Housing and Urban Development for Public Housing in the County of PHA jurisdiction.
  - d. The applicant family must conform to the Occupancy Standards contained in this policy regarding unit size and type.
  - e. The applicant must have a satisfactory record in meeting past financial obligations, especially in payment of rent. In situations where an unsatisfactory record is obtained the PHA shall take into consideration extenuating circumstances such as illness, or other incidents beyond the control of the applicant.
    - Applicants shall not have a history (over the past two years) of habitual late rent payments, as defined by eight (8) or more late payments during one calendar year;
    - Applicants shall not have been sued more than two (2) times over the past two (2) years for habitual late rent payments;
    - Applicants shall not have been sued more than four (4) times during the entire tenancy for habitual late rent payments;

- Applicants shall not have been evicted for non-payment of rent over the past two years.
  
- f. Section 214 of the Housing and Community Development Act of 1980, as amended, prohibits the Secretary of the Department of Housing and Urban Development (HUD) from making financial assistance available to persons who are other than United States Citizens, nationals, or certain categories of eligible non-citizens either applying to or residing in specified Section 214 covered programs. Section 214 programs include: Public Housing, Section 8 Rental Certificate Program and Section 8 Rental Voucher Program.
  
- g. Any tenant evicted from federally assisted housing by reason of drug-related criminal activity shall not be eligible for federally assisted housing during the 3-year period beginning from the date of such eviction, unless the evicted tenant successfully completes a rehabilitation program approved by the Housing Authority, and/or if the circumstances leading to eviction no longer exists.
  
- h. The Housing Authority shall prohibit admission for any household member who the Housing Authority determines is illegally using a controlled substance, or determines that a household member's illegal use, or pattern of illegal use, of a controlled substance, or abuse, or pattern of abuse, of alcohol, may interfere with the health, safety, or right to peaceful enjoyment of the premises by other residents. QHWRA further stipulates that individuals convicted of manufacturing or producing methamphetamine (speed) will be permanently denied admission to public housing and a current resident's tenancy will be immediately and permanently terminated if convicted of manufacturing or producing methamphetamine.

In determining whether to deny admission to the Housing Authority any household based on a pattern of abuse of alcohol by a household member, the Housing Authority may consider whether such a household member:

- (i) Has successfully completed a supervised drug or alcohol rehabilitation program (as applicable) and is no longer engaging in the illegal use of a controlled substance or abuse of alcohol (as applicable);
  
- (ii) Has otherwise been rehabilitated successfully and is no longer engaging in the illegal use of controlled substance or abuse of alcohol (as applicable); or



- (iii) Is participating in a supervised drug or alcohol rehabilitation program (as applicable) and is no longer engaging in the illegal use of a controlled substance or abuse of alcohol (as applicable).
- i. The Housing Authority shall prohibit admission for any applicant or member of the applicant's household who the Housing Authority determines is or was, during a reasonable time preceding the date when the applicant household would otherwise be selected for admission, engaged in any drug-related or violent criminal activity or other criminal activity which would adversely affect the health, safety, or right to peaceful enjoyment of the premises by other residents or Housing Authority staff.
- j. The Housing Authority shall prohibit admission of any applicant or member of the applicant's household who has been convicted of a felony.
- k. The Housing Authority shall prohibit admission for any applicant or member of the applicant's household that the Housing Authority determines is subject to a lifetime registration requirement under a state sex offender registration program.
- l. The applicant family must have no record of disturbance of neighbors, destruction of property, unsafe living habits, unsanitary housekeeping practices, substance abuse, or any other history which may be reasonably expected to adversely affect:
  - (i) The health, safety, or welfare of other residents;
  - (ii) The peaceful enjoyment of the neighborhood by other residents; or
  - (iii) The physical environment and fiscal stability of the neighborhood.
- m. The applicant family must not have a record of grossly unsanitary or hazardous housekeeping. This includes the creation of a fire hazard through acts such as the hoarding of rags and papers; severe damage to premises and equipment, if it is established that the family is responsible for the condition; seriously affecting neighbors by causing infestation, foul odors, depositing garbage improperly; or serious neglect of the premises. In a case where a qualified agency is working with the applicant family to improve its housekeeping and the agency reports that the applicant family shows potential for improvement, decision as to eligibility shall be reached after referral to and recommendation by the Executive Director or his/her designee. This category does not include

applicant families whose housekeeping is found to be superficially unclean or lacks orderliness, where such conditions do not create a problem for the neighbors.

- n. The applicant family must be able to demonstrate capacity to discharge all lease obligations. This determination shall be made on a case by case basis and shall not be used to exclude a particular group by age, handicap, etc. In determining the applicant family's capacity to discharge all lease obligations the HA must consider the family's ability to secure outside assistance in meeting those obligations.
- o. If the applicant is a former resident of public housing or Section 8 housing programs administered by an agency, the applicant family must have a satisfactory record in meeting financial and other lease obligations. A former resident who owes a move out balance to the Housing Authority will not be considered for re-admission until the account is paid in full and reasonable assurance is obtained of the applicant's ability to meet his or her rent obligations.
- p. The applicant must not have a history of non-compliance with rental agreements including failure to comply with the terms of the rental agreements on prior residences, such as providing shelter to unauthorized persons, keeping pets or other acts in violation of rules and regulations, and painting or decorating without permission of the owner.
  - Any applicant who has been evicted from a public housing program or terminated from a Section 8 Rental Program shall not be eligible to receive any type of housing assistance for five (5) years.
- q. The applicant family must have properly completed all application requirements, including verifications. Misrepresentation of income, family composition or any other information affecting eligibility, rent, unit size, neighborhood assignment, etc. will result in the family being declared ineligible. In the event the misrepresentation is discovered after admission, the family may be subsequently evicted, even if the family meets current eligibility criteria at that time.
- r. Other factors affecting a final determination of eligibility include:
  - (i) Household has no outstanding indebtedness to the PHA or any other federal housing program;
  - (ii) Family will occupy unit as their sole place of residence.

3. Substance abuse as described in this policy and drug-related criminal activity as described in this policy shall include, but not be limited to, the illegal manufacture, sale, distribution, use, or possession with intent to manufacture, sell, distribute, or use, of a controlled substance (as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802), and Section 428 of the FY 1999 HUD Appropriations Act).
4. Sources of information for eligibility determination may include, but are not limited to, the applicant (by means of interviews or home visits), landlords, employers, family social workers, parole officers, court records, drug treatment centers, clinics, physicians or police departments where warranted by the particular circumstances. Information relative to the acceptance or rejection of an applicant shall be documented in accordance with Part C; Verification, and placed in the applicant's file. Such documentation may include reports of interviews, letters or written summaries of telephone conversations with reliable sources. At a minimum, such reports shall indicate the date, the source of information, including the name and title of the individual contacted, and a summary of the information received.
5. In the event of the receipt of unfavorable information with respect to an applicant, consideration shall be given to the time, nature, and extent of the applicant's conduct or to factors that might indicate a reasonable probability of favorable future conduct or financial prospects. For example:
  - a. Evidence of rehabilitation.
  - b. Evidence of the applicant family's participation or willingness to participate in social services or other appropriate counseling service programs and the availability of such programs.
  - c. Evidence of the applicant family's willingness to attempt to increase family income and the availability of training or employment programs in the locality.
  - d. In the case of applicants whose capacity for independent living and discharge of lease obligations is in question, the resources actually available in support of the family, such as visiting nurses, homemakers or Live-In caretakers.
6. An otherwise ineligible handicapped applicant shall be eligible for admission if the problem resulting in the ineligibility can be addressed through reasonable accommodations.
7. Tenancy at properties for elderly and/or handicapped persons will be based upon the applicant's ability to live independently or to live independently with limited supportive services.

8. The Housing Authority will not unnecessarily segregate individuals with handicaps to particular areas or developments. The Housing Authority will provide assistance to enable all individuals with handicaps to meet legal requirements; for example, the Housing Authority could provide interpreters, Braille or taped versions of leases, recertifications and other legal documents, whatever is appropriate.
9. In the event an individual is refused housing based on one or more of the above screening criteria, he/she may request an informal hearing or appeal to the Executive Director in writing.

## **Selection**

### 1. Applicant Ranking

Applications will be filed and selected by unit type and size; by preference; and by date and time of application. If an applicant claims a preference, they are considered to be a priority applicant. Applicants who claim no preference are considered to be non-priority applicants.

### 2. Preferences

a. The Carrollton Housing Authority offers the following preferences;

- ◆ Resident in City of Carrollton
- ◆ Resident in Carroll County
- ◆ Resident in State of Georgia
- ◆ Homeless or displaced due to domestic violence
- ◆ Currently living in substandard housing

b. Preference shall be given to elderly and disabled applicants over other singles.

#### c. Denial of Preference

A preference shall not be given to an applicant if any member of the family is a person who has been evicted from housing assisted under a 1937 Housing Act program due to drug related criminal activity.

However, a preference may be given if:

- (i) The applicant or family member evicted has successfully completed a drug rehabilitation program; or,
- (ii) The applicant or family member clearly did not participate in drug related criminal activity; or,

- (ii) The Housing Authority determines that the applicant or family member no longer participates in any drug related criminal activity.

d. Weighting Preferences

Preferences shall be weighted as follows:

<u>Preference</u>	<u>Point Value</u>
◆ Resident in City of Carrollton	6
◆ Resident in Carroll County	4
◆ Resident in State of Georgia	2
◆ Homeless or displaced due to domestic violence	1
◆ Currently living in substandard housing	1

3. Waiting List

a. Housing Authority-Wide Waiting List

The Housing Authority-wide waiting list will be ordered as follows:

- (i) By unit type (regular, elderly, special handicapped) and in unit size by bedrooms.
- (ii) By preference only.
- (iii) Within the priorities above, by date and time of application.
- (iv) Families who claim no preference will be notified by the Housing Authority that their names will be retained on the waiting list as non-priority applicants. If at some future time, their status changes in regards to a preference, they will be entitled to claim the preference, and be added to the priority waiting list.

4. Waiting List Skipping

The Housing Authority may skip a higher-income eligible applicant family to the top of the waiting list if a dwelling unit in a development becomes vacant and the development requires a lower income family to meet the Housing Authority's income targeting goals.

The Housing Authority may also skip a lower-income eligible applicant family to the top of the waiting list if a dwelling unit in a development becomes vacant and the development requires a higher income family to meet the Housing Authority's income targeting goals.

5. Updating of the Waiting List

Procedure for updating the waiting list is at the PHA discretion, however the waiting list must be purged at least once every 12 months.

The Housing Authority shall update the waiting list every ninety (90) days in order to maintain the most current information. Applicants will be requested to provide the Housing Authority with updated information through writing. Applicants who do not respond to the request to update shall be removed from the waiting list. If the applicant's failure to respond was due to the applicant's disability, the Housing Authority shall provide reasonable accommodations to give the applicant an opportunity to respond.

6. Applicant Selection and Assignment

The PHA will select applicants for participation without discrimination based on race, color, sex, creed, or national origin nor deny any family or individuals the opportunity to apply for assistance under the Low-Rent Housing Program. Neither will the PHA discriminate because of religion, age, physical handicap, pregnancy, parenthood, nor marital or veteran status.

The selection of residents for occupancy of available units will be in conformance with all HUD guidelines and regulations and applicable Fair Housing and Equal Opportunity Requirements.

7. Special Use Dwelling Units

a. When a unit that meets a specific need (e.g., a unit designed to accommodate a handicapped tenant requiring the use of a wheelchair) becomes available, that unit will be offered first to a current occupant of another unit managed by the Housing Authority having handicaps and requiring the accessibility features of the vacant unit. If no such occupant exists, the unit will be offered to the next eligible applicant on the waiting list requiring that special unit. If there are no applicants on the waiting list needing a specially designed unit, the unit will then be offered to those eligible qualified applicants in their normal sequence.

b. Elderly applicants will be given preference for units designed specifically for elderly occupancy. Near Elderly Single Persons will be given preference over Non-Elderly Single Persons for units designed specifically for elderly occupancy.

8. Dwelling Unit Offers

➤ Three unit offers: If the PHA has three or more developments, the PHA can make an offer in the development with the highest number of vacancies, or can make an offer that will satisfy the authority's deconcentration goals. If this unit is rejected, the PHA can make two other

offers to the applicant. If all three units are rejected, the applicant goes to the bottom of the waiting list. However, the PHA can define "bottom of the waiting list" by denying preferences to those applicants who reject an offer.

When the applicant is matched to the specific unit, that dwelling unit becomes "unrentable" until the offer is made and accepted or rejected. In order to reduce vacancy loss, it is necessary that processing from this point move as quickly as possible. To that end, the following conditions shall apply to dwelling unit offers:

- a. As an applicant moves near the top of the waiting list, the Housing Authority will contact the applicant family to determine continued interest, to update the application for final processing, to alert the applicant that an offer is likely in the near future, and to inform the applicant about the requirements for move-in, such as utility deposits, security deposits, etc.
- b. Upon availability for occupancy, an applicant will be offered a unit.
- c. Upon offer of an apartment, the applicant shall have five (5) days to accept or reject the apartment. An additional business day may be granted if necessary to allow the applicant to inspect the apartment. Failure to give an answer within the prescribed time period shall be counted as rejection of the offer.
- d. Upon acceptance of the offer, the applicant will then be assigned a deadline for move-in. Before the end of this period, the applicant must complete all outstanding pre-occupancy requirements, such as joint HQS unit inspection, establishment of utility services, leasing interview, and lease execution. Failure to complete move-in requirements within the assigned period will result in withdrawal of the offer and inactivation of the application.

#### 9. Unit Refusals

- a. Applicants will be made one (1) offer of a unit of appropriate size and type. Should the family reject all three offers that may be made in accordance with this policy, the family will be placed at the bottom of the waiting list.
- b. After the first offer has been made and rejected, such an applicant would be made an offer in accordance with the provisions of this policy.
- c. When an applicant refuses an three offers of an apartment, his/her application shall be returned to the bottom of the waiting list, unless the applicant can document that a move at that time would create an undue hardship on the family which is NOT related to race, creed, sex, national origin, religion, handicap or familial status.

- d. Applicants not responding to an offer of housing by the PHA shall be ruled ineligible and their application will be removed to the inactive/ineligible file and so documented.
- e. An applicants will have five (5) working days to accept or reject an offer of housing after receipt of notice of unit availability. Failure to respond to a notice of unit availability will be treated as a no response.

### **Wait List**

#### *Pre-applications*

Pre-applications will be made available to applicants at the central intake center, or at designated sites, if applicable. Applicants will complete the pre-application form and return it to the housing authority where the family's name and information, and date and time of receipt, will be added to the waiting list.

The pre-application will request the names, age and social security numbers of all family members, the amount and source of income of each family member, and whether the applicant claims a preference. The applicant will be responsible for reporting any change of address or of circumstance (i.e., change in family composition, change in income). The authority will not verify the information provided by the family until the family's name comes to the top of the list.

#### *The Application Process*

All admissions to public housing shall be made on the basis of a personal interview where an application is completed by the applicant family and Housing Authority personnel. The Application for Admission shall constitute the basic legal record of each family applying for admission and shall support the Housing Authority's determinations of eligibility status, priority status, rent, and size of unit for which the applicant is qualified. All supplemental materials pertaining to eligibility shall be considered a part of the application record and carefully recorded. This includes verifications of income and family composition and such other data as may be required. The following conditions shall govern the taking and processing of applications:

1. Applications for the public housing program will be completed during a one on one interview between the applicant family and Housing Authority personnel and shall be maintained on the Housing Authority's computer system. Applicants shall complete and sign the application and certify, subject to civil and criminal penalties, to the accuracy of all statements made therein. The Housing Authority reserves the right to require the signature of any or all adult members of the applicant household.
2. Applicants will be required to submit verification documentation as part of the application process. Applicants will be given a list of required verifications at the time of their interview with designated PHA personnel for the purpose of determining eligibility.



3. Should applicants fail to provide required verification documentation within time frame established by the PHA, their case will be placed in an inactive status and will be required to reapply during the next enrollment period.
4. The Housing Authority reserves the right to suspend application taking when the current supply of completed full applications exceeds the number of families that could be reasonably expected to be housed within the next twelve months.
5. The Housing Authority will normally take applications from a central location which will allow for processing by staff persons knowledgeable of the rules and regulations governing resident selection and assignment, but reserves the right to establish satellite locations for application taking.
6. The Housing Authority reserves the right to establish times for taking applications, including by appointment. The Housing Authority staff may, at its discretion, provide for application interviews outside normal hours when necessary for hardship reasons.
7. Insofar as possible, application interviews shall be conducted in private.
8. Applications shall be updated as applicants report changes in income and family circumstances. All modifications to applications shall be properly documented and the transaction initialed by the staff member making the change.
9. All active applications will be purged no less than once every 12 to 18 months. Notification shall be sent to each applicant informing him/her that unless he/she confirms his/her continued interest, his/her application will be retired from the active file. Returned notification will be attached to the respective application as evidence of unsuccessful effort to locate the applicant. All applicants will be instructed to notify the PHA whenever there is a change in family composition, income, address, and any other factors relative to their eligibility status. Applicants should notify the PHA if he/she no longer desires consideration for public housing.
10. Applicants on waiting lists for any other type of assisted housing will have no special status with respect to the Low-Rent Public Housing Program. Applicants must submit separate applications for other programs. Applicants will not lose their place on any other PHA waiting list should they make an application for "Low-Rent" public housing. This right will be explained to each applicant who might have previously filed an application for a dwelling unit through any other PHA program.
11. The Housing Authority shall maintain such records as are necessary to document the disposition of all applications and to meet Department of Housing and Urban Development audit requirements.

## Section 8

### Eligibility

The Family's apparent eligibility for placement on the waiting list will be made in accordance with criteria consistent with Federal regulations. **(The Definition of a Family has been revised to meet the requirements of 24 CFR 5.403.)**

Evidence of Citizenship/Eligible Immigrant Status will not be verified until the family is selected from the waiting list for issuance of a voucher.

Preference factors will not be verified until the family is selected from the waiting list for issuance, unless the family is changing from Non-Preference to claiming a Preference.

The HA will apply the following additional criteria, in addition to the HUD eligibility restrictions, as grounds for denial of admission to the program.

- The family must not have violated any family obligations during a previous participation in the Section 8 program during the past 24 months.

If the HA denies assistance to an applicant with a disability, the applicant may request a review of the family obligation that was violated, if the violation was a result of the disability.

An exception may be granted by the HA if the family member who violated the family obligation is not a current member of the household on the application.

- No Family member may have committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program in the last 24 months.
- The Family must have paid, or made satisfactory arrangements to pay, any outstanding debt owed the HA or another HA as a result of prior participation in any federal housing program.

At any time up to final eligibility, the Family may enter into a Repayment Agreement to repay the outstanding debt within 12 months. If the family does not repay the debt in accordance with the terms of the Repayment Agreement, the family is subject to termination from the Section 8 program.

The HA reserves the right, in the case of extreme hardship, to amend the Repayment Agreement in accordance with its procedures. Full documentation of the hardship will be required. In no case will the debt be forgiven.

- No member of the family may have engaged in drug related or violent criminal activity within the past five years for the date of the arrest.

(If either as a result of the standardized inquiry or the receipt of a verifiable referral, there is indication that the family or any family member is engaged in drug-related criminal activity or violent criminal activity, the HA may conduct closer inquiry through police or court records to determine whether the family should be denied admission.)

- No family member may have been evicted from public housing for any reason during the past 24 months.
- No family member may have engaged in or threatened abusive or violent behavior toward HA personnel within the past 24 months.
- The applicant must have properly completed all application requirements.

Failure of an applicant to cooperate with the HA in obtaining verifications will result in the application being declared incomplete.

- Misrepresentation of income, family composition, or any other information affecting eligibility, preference, or unit size will result in the family being declared ineligible. Also, giving false information regarding the applicant's criminal history will cause the family to be declared ineligible.

If misrepresentation is discovered after admission, the family may subsequently be terminated for the Section 8 program, even if the Family meets current eligibility criteria at that time.

- For identification purposes and proof of age, the head of household must provide a picture ID and a copy of each family members' birth certificate, or other acceptable documents. (See Verifications)

### *Ineligible families*

Families who are determined to be ineligible for admission will be notified in writing of the reason for denial and given an opportunity to request an informal review, (or an informal hearing if they were denied due to non-citizen status), based on the HA's Complaints and Appeals procedures.

### **Selection**

#### *Application Pool*

The HA will perform the activities which ensure that an adequate pool of qualified applicants will be available so that program funds are used in a timely manner. An

adequate pool will be defined as having enough preference holders on the waiting list to fill available slots for a period of at least 12 months.

The waiting list will be maintained in accordance with the following guidelines:

- The application will be a permanent file
- All applicants in the pool will be maintained in order of preference and date and time of application
- All applicants must meet “Very low income” eligibility requirements as established by HUD. Any exceptions to these requirements, other than those outlined in Chapter 2, the HUD Field Office must, have approved “Eligibility for Admission”, previously.

*Prohibition of Preferences {24 CFR 982.207}*

An applicant will not be granted any preferences if any member of the family has been evicted from any federally assisted housing during the past three years because of drug-related criminal activity.

The HA may grant an exception to such a family if verified through medical and/or police records that:

- The responsible member has successfully completed a HA approved rehabilitation program, (such as “Mothers Making a Change”)
- The evicted person was not involved in the drug related activity that caused the eviction
- The evicted person is no longer involved in any drug related criminal activity.

If an applicant makes a false statement in order to qualify for a preference, the HA will deny admission to the program.

*Preference Categories*

The HA’s system of Preferences is designed to meet local objective in choosing among applicants.

All admission preferences will be established and administered in accordance with Fair Housing Requirements and HUD implementing regulation as cited in CFR 982.20(g).

Preferences will be consistent with HUD’s affirmative fair housing objective in not discriminating against families or family members on the basis of race, color, religion, sex, national origin, age, familial status or disability.

The HA's preferences will not be in conflict with the local Comprehensive Housing Affordability Strategy (CHAS) for the City of Carrollton.

Applicants may claim a preference:

- When they initially apply for admission
- At any time while on the waiting list

#### *Notification to Applicants*

The HA will inform all applicants about the available preferences by means of public notices published in the local newspaper, displayed at the HA and other public bulletin boards, notifications to Social Services agencies, and in written material given to families upon request and/or at the time of application.

#### *Preference Ranking*

<u>Preference</u>	<u>Point Value</u>
◆ Resident in City of Carrollton	6
◆ Resident in Carroll County	4
◆ Resident in State of Georgia	2
◆ Homeless or displaced due to domestic violence	1
◆ Currently living in substandard housing	1

#### *Initial Determination of Preference Qualification {24 CFR 982.210 (c)(3)}*

At the time of application, an applicant's entitlement to a Preference may be made on the basis of:

- An applicant's certification that they qualify for a preference. When the family is selected from the waiting list for the final determination of eligibility, the preference will be verified. (For preferences other than Displaced by City of Carrollton Code Enforcement)

Once the HA has verified an applicant's qualification for a preference, the HA need not require the applicant to provide information needed by the HA to verify such qualifications again unless:

- The HA determines re-verification is desirable because a long time has passed since verification; or
- The HA has reasonable grounds to believe that the applicant no longer qualifies for the preference.

If the preference verification indicates that an applicant does not qualify for the preference, the applicant will be returned to the waiting list and ranked without the preference and given an opportunity for a meeting.

If, at the time the family applies, the preference was the only reason for placement of the family on the list and the family cannot verify preference eligibility as of the date of application, the family will be removed from the list.

If HUD awards a HA program funding that is targeted for specifically named families, the HA will admit these families under a Special Admission procedure.

Special admissions families will be admitted outside of the regular waiting list process. They do not have to qualify for any preferences, nor are they required to be on the program waiting list.

The following are HUD may designate examples of types of program funding that for families living in a specified unit:

- A family displaced because of demolition or disposition of a public or Indian housing project
- A family residing in a multifamily rental housing project when HUD sells, forecloses or demolishes the project
- For housing covered by the Low Income Housing Preservation and Resident Homeownership Act of 1990
- A family residing in a project covered by a project based Section 8 HAP contract at or near the end of the HAP contract term
- A non-purchasing family residing in a HOPE 2 or HOPE 2 project

#### *Targeted Funding*

When HUD awards special funding for certain family types, families who qualify are placed on the regular waiting list. When a specific type of funding becomes available, the waiting list will be searched for the first available family meeting the targeted funding criteria.

#### *Preference Eligibility {24 CFR 982.210 (c)(3-4)}*

Changes in an applicant's circumstances while on the waiting list may affect the family's entitlement to a preference. Applicants are required to notify the HA in writing when their circumstances change. When an applicant claims an additional preference, he/she will be placed on the waiting list in the proper order of their newly claimed preference after providing written verification of such preference.

*Preference Denial {24 CFR 982.210 (d)}*

If the HA denies a preference, the HA will notify the applicant in writing of the reasons why the preference was denied and offer the applicant an opportunity for a meeting. If the preference denial is upheld, as a result of the meeting, or the applicant does not request a meeting, the applicant will be placed on the waiting list without benefit of the preference.

If it is determined that the applicant falsified documents or made false statements in order to qualify for any Preference, the applicant will be removed from the Waiting List.

Applicants may exercise other rights if they believe they have been discriminated against on the basis of race, color, religion, sex, national origin, age, disability, or familial status through HUD, Fair Housing, or legal action.

*Removal from Waiting List and Purging {24 CFR 982.204 (c)}*

If an applicant fails to respond to the first mailing from the HA with respect to the family's preference, the applicant will be sent a notification of removal from the waiting list and given ten days to contact the HA. If the applicant fails to respond within that time frame, he/she will be removed from the waiting list. An extension will be considered as an accommodation, if required by a person with a disability. If a letter is returned by the Post Office for erroneous address, the applicant will be removed without further notice and the envelope and letter will be maintained in the file.

A mailing to all applicants to ensure that the waiting list is current and accurate will periodically purge the waiting list. The mailing will ask for current information and confirmation of continued interest.

The same notice guidelines as stated previously will be used for failure to respond to this mailing

Notices will be made available in accessible format upon the request of a person with a disability.

**2. Financial Resources**

The table below lists the Carrollton Housing Authority’s anticipated resources, such as PHA Operating, Capital and other anticipated Federal resources available to the Authority, as well as tenant rents and other income available to support public housing and Section 8 in Fiscal Year 2015. The Capital Fund amounts are the unobligated amounts as of 12/31/2014.

<b>Funding Source</b>	<b>Amount</b>	<b>Use</b>
FY2015 PH Operating Fund	\$1,000,000	PH Operations
FY2015 Capital Fund Program	\$332,439	Modernization
FY2014 Capital Fund Program	\$325,428	Modernization
Section 8 Housing Choice Voucher	\$1,350,000	HCV Operations
ROSS Grants	\$325,000	Self-Sufficiency
Public Housing Dwelling Rent	\$340,000	PH Operations
Interest	\$3,000	PH Operations
Other Income	\$25,000	PH Operations
<b>Total</b>	<b>\$3,700,867</b>	

**3. Rent Determination**

**Public Housing**

1. Determining the Total Tenant Payment is a two-step process. Total Tenant Payment for families whose initial lease is effective on or after August 1, 1982, shall be the highest of the following rounded to the nearest dollar:
  - a. 30 percent of monthly Adjusted Income; or
  - b. 10 percent of Monthly Income;
  - c. The welfare rent, if applicable.
  - d. A minimum rent amount of \$50.

After the highest amount has been determined above, that number is compared to the flat rent of the unit size that is or will be occupied by the family, and the lower of the amount determined above or the flat rent is the Total Tenant Payment.

2. Total Tenant Payment does not include charges for excess utility consumption or other miscellaneous charges, such as maintenance charges, late charges, etc.



## **Section 8**

### 1. Family Share of Rent

Family share of rent shall be calculated based on:

- a. 30% of the monthly adjusted income of the family; or,
- b. 10% of the monthly income of the family; or,
- c. If the family is receiving payments for welfare assistance from a public agency and a part of those payments, adjusted in accordance with the actual housing costs of the family, is specifically designated by that agency to meet the housing costs of the family, the portion of those of those payments that is so designated.

### 2. Minimum Rental Amount

The Housing Authority shall require families to pay a minimum monthly rental amount of \$50. This minimum rent shall include any amount allowed for utilities.

### 3. Exemption for Hardship Circumstances

The Housing Authority shall immediately grant an exemption from application of the minimum monthly rental amount to any family unable to pay such amount because of financial hardship, which shall include situations in which:

- a. The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program, including a family that includes a member who is an alien lawfully admitted for permanent residence under the Immigration and Nationality Act who would be entitled to 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 circumstances, including loss of employment;
- d. A death in the family has occurred.

If a resident requests a hardship exemption and the Housing Authority reasonably determines the hardship to be of a temporary nature, an exemption shall not be granted during the 90-day period beginning upon the making of a request for the

exemption. A resident shall not be evicted during the 90-day period for non-payment of rent. In such a case, if the resident thereafter demonstrates that the financial hardship is of a long-term basis, the Housing Authority shall retroactively exempt the resident from applicability of the minimum rent requirement for such 90-day period.

#### **4. Operation and Management**

The Authority has a staff of maintenance mechanics which provide general maintenance services at each site to help ensure the units are kept in good working order. If a resident needs an item repaired, they are asked to call the management office and place a work order. Once the work order is entered, a maintenance mechanic will go to the unit to repair the item. If the need for repair was not caused by the resident, then the Authority does not charge the resident. If the resident caused the repair, then they are charged according to the Maintenance Charge List on file at the office.

The Authority also has a preventative maintenance schedule in which items such as filters for the HVAC systems are changed out on a regular basis.

The Authority also has a pest control plan in which each unit is sprayed once a month to help control pest infestation.

CHA also has many policies which management uses to operate the Agency on a daily basis. The main policies are listed below:

- Personnel
- Procurement
- Pet
- Admissions and Continued Occupancy (LIPH)
- Administrative Plan (HCV)
- Grievance
- Disposition
- Capitalization
- Domestic Violence
- Investment

#### **5. Grievance Procedures**

##### *Purpose*

This grievance procedure has been adopted to provide a forum and procedure for residents to seek the just, effective and efficient settlement of grievances against the Carrollton Housing Authority (CHA).

### *Governing Law*

The law governing this grievance procedure is section 6(k) of the U.S. Housing Act of 1937 (42 U.S.C. sec. 1437d (k) and subpart B of 24 CFR part 966 (24 CFR secs. 966.50 - 966.57).

### *Applicability*

In accordance with applicable federal regulations, this grievance procedure shall be applicable to all individual grievances between a resident and the HA with the following two (2) exceptions:

- A. This grievance procedure is not applicable to disputes between residents not involving the HA, or to class grievances involving groups of residents. Also, this grievance procedure is not intended as a forum for initiating or negotiating policy changes between residents, or groups of residents, and the HA's Board of Commissioners.
  
- B. HUD has issued a due process determination that the law of the State of Georgia requires that residents be given the opportunity for a hearing in court that provides the basic elements of due process before eviction from a dwelling unit. Therefore, the HA has elected to determine that this grievance procedure shall not be applicable to any termination of tenancy or eviction that involves:
  - (1) Any activity that threatens the health, safety, or right to peaceful enjoyment of the premises of other residents or employees of HA; or
  - (2) Any drug-related criminal activity on or off such premises.

Any termination of tenancy or eviction that does fall into one of these two categories shall be handled within the confines of the Expedited Grievance Procedure.

### *Definitions*

The following definitions of terms shall be applicable to this grievance procedure:

- A. **Grievance:** Any dispute which a resident may have with respect to an action or a failure to act by HA in accordance with the individual resident's lease or HA regulations, which adversely affects the individual resident's rights, duties, welfare, or status.
  
- B. **CFR:** The code of federal regulations that contains the federal regulation governing this grievance procedure.

- C. **Complainant:** Any resident (as defined in this section below) whose grievance is presented to the Central Office of the HA, P.O. Box 627, Carrollton, GA, 30117, in accordance with the requirements set forth in this procedure.
- D. **Drug-related criminal activity:** The illegal manufacture, sale, distribution, use or possession with intent to manufacture, sale, distribute, or use of a controlled substance as defined in sec. 102 of the Controlled Substances Act (21 U.S.C. sec 802), as from time to time amended.
- E. **HA or “Housing Authority”:** The Housing Authority, a body corporate organized and existing under the laws of the State of Georgia.
- F. **Elements of due process:** The following procedural safeguards are required to be followed in an eviction action or a termination of tenancy in a state or local court:
- (1) Adequate notice to the resident of the grounds for terminating the tenancy and for eviction;
  - (2) Right of the resident to be represented by counsel;
  - (3) Opportunity for the resident to refute the evidence presented by the HA, including the right to confront and cross examine witnesses and to present any affirmative legal or equitable defense which the resident may have;
  - (4) A decision on the merits.
- G. **Hearing Officer:** An impartial person selected in accordance with 24 CFR Sec 966.55 and this grievance procedure to hear grievances and render decisions with respect thereto.
- H. **Hearing Panel:** A three-member panel composed of impartial persons, selected in accordance with 24 CFR Sec. 966.55 and this procedure to hear grievances and render decisions with respect thereto.
- I. **HUD:** The United States Department of Housing and Urban Development.
- J. **Notice:** As used herein, the term notice shall, unless otherwise specifically provided, mean written notice.
- K. **The “Regulations”:** The HUD regulations contained in subpart B of 24 CFR part 966.

- L. **Resident Organization:** An organization of residents, which includes any Resident Management Corporation and specifically includes the Resident Organization.
- M. **Resident:** The adult person (or persons) other than a live-in aide:
  - (1) Who resides in the unit and who executed the lease with the PHA as lessee of the dwelling unit, or, if no such person resides in the unit
  - (2) The person who resides in the unit and who is the remaining head of the household of the resident family residing in the dwelling unit.
- N. **Business Days:** Monday through Friday of each week, except for legal holidays recognized by the federal government.

*Incorporation in Leases*

This grievance procedure shall be incorporated by reference in all public housing dwelling leases between residents and the HA, whether or not so specifically provided in such leases.

**Informal Settlement of grievances**

- A. **Initial Presentation.** Any grievance must be presented, in writing to the HA's Central Office, P.O. Box 627, Carrollton, GA, 30117, within five (5) business days after the occurrence of the event giving rise to the grievance.
- B. **Informal Settlement Conference.** If the grievance is not determined by the HA to fall within one of the two exclusions mentioned above, then the HA shall, within five (5) business days after the initial presentation of the grievance to informally discuss the grievance with the complainant or his representative(s) in an attempt to settle the grievance without the necessity of a formal hearing. If the informal settlement conference cannot occur at the time the grievance is initially presented by the complainant, then the complainant shall be promptly notified in writing of the time and place for the informal settlement conference.
- C. **Written Summary.** Within five (5) business days after the informal settlement conference, a summary of the informal discussion shall be prepared by the HA and a copy thereof shall be provided to the complainant. The summary shall be in writing and shall specify the names of the participants in the discussion, the date of the discussion, the nature of the proposed disposition of the grievance, and the specific reasons for such disposition. This written summary shall also specify the procedures by which the complainant may obtain a formal hearing if not satisfied by the proposed disposition of the grievance. A copy of the written summary shall also be placed in complainant's file.

### *Formal Grievance Hearing*

The following procedures apply to the request for a formal grievance hearing under this grievance procedure:

- A. **Request for Hearing:** If the complainant is not satisfied with the results of the informal settlement conference, the complainant must submit a written request for a formal hearing to HA's Central Office, P.O. Box 627, Carrollton, GA, 30117, no later than five (5) business days after the date complainant receives the summary of discussion delivered as required above. Complainant's written request for a formal hearing must specify:
- (1) The reasons for the grievance;
  - (2) The action or relief sought by the complainant; and
  - (3) If the complainant so desires, a statement setting forth the times at which the complainant shall be available for a hearing during the next ten (10) business days;
  - (4) Complainant's preference, if any, concerning whether the grievance should be heard by a single hearing officer or by a hearing panel;
  - (5) If the complainant has failed to attend an informal discussion conference, a request that the hearing officer or panel waive this requirement.
- B. **Failure to Request Hearing:** If the complainant fails to request a hearing within five (5) business days after receiving the written summary of the informal settlement conference, the HA's decision rendered at the informal hearing becomes final and the HA is not thereafter obligated to offer the complainant a formal hearing.

### *Selection of Hearing Officer or Panel*

All grievance hearings shall be conducted by an impartial person or persons appointed by the HA after consultation with resident organizations, in the manner described below:

- A. The permanent appointments of persons who shall serve as hearing officers and hearing panel members shall be governed by the following procedures:
- (1) The HA shall nominate a slate of persons to sit as permanent hearing officers or hearing panel members. These persons may include, but shall not be necessarily limited to, members of the HA Board of Commissioners, HA staff members, residents, or other responsible persons in the community. No persons shall be listed on the slate of members unless such person has consented to serve as a hearing officer or on a hearing panel.

- (2) The slate of potential appointees shall be submitted to the Resident Organization for written comments. Written comments from the resident organization shall be considered by the HA before appointments are finally made. Objection to the appointment of a person as a hearing officer or panelist must be considered but is not dispositive as to the proposed appointment with respect to which objection is made.
- (3) On final appointment, the persons appointed and the Resident Organization shall be informed in writing of the appointments. A list of all qualified hearing officers and panelists shall be kept at the Central Office of the HA and be made available for public inspection at any time.

The persons who have agreed to serve as hearing panelists for grievances brought under this procedure are listed on Exhibit I attached hereto and hereby incorporated herein by reference. Additional appointments shall be made in the manner set forth in this section.

B. The designation of hearing officers or panel members for particular grievance hearing shall be governed by the following provisions:

- (1) All hearings shall be held before a single hearing officer unless the complainant (at the time of the initial request for the hearing) or the HA requests that the grievance should be heard by a hearing panel.
- (2) Appointments to serve as a hearing officer or panelist with respect to a particular grievance shall be made by the HA in random order, subject to availability of the hearing officer or panelist to serve in each such case. The HA may employ any reasonable system for random order choice.
- (3) No member of the HA Board of Commissioners or staff may be appointed as hearing officer or panelist in connection with the grievance contesting an action which was either made or approved by proposed appointee, or which was made or approved by a person under whom the proposed appointee works or serves as a subordinate.
- (4) No person shall accept an appointment, or retain an appointment, once selected as a hearing officer or hearing panelist, if it becomes apparent that such person is not fully capable of impartiality. Persons who are designated to serve as hearing officers or panelists must disqualify themselves from hearing grievances that involve personal friends, relatives, persons with whom they have any business relationship, or grievances in which they have some personal interest. Further, such persons

are expected to disqualify themselves if the circumstances are such that a significant perception of partiality exists and is reasonable under the circumstances. If a complainant fails to object to the designation of the hearing officer or panelists on the grounds of partiality, at the commencement or before the hearing, such objection is deemed to be waived, and may not thereafter be made.

In the event that a hearing officer or panel member fails to disqualify himself or herself as required in this grievance procedure, the HA shall remove the panel member or officer from the list of persons appointed for such purposes, invalidate the results of the grievance hearing in which such person should have, but did not, disqualify himself or herself, and schedule a new hearing with a new hearing panel or officer.

#### *Scheduling of Hearings*

A. **Hearing Prerequisites:** A complainant does not have a right to a grievance hearing unless the complainant has satisfied the following prerequisites to such a hearing:

- (1) The complainant has requested a hearing in writing.
- (2) The complainant has completed the informal settlement conference procedure or has requested a waiver for good cause.
- (3) If the matter involves the amount of rent which the HA claims is due under the complainant's lease, the complainant shall have paid to the HA an amount equal to the amount due and payable as of the first of the month preceding the month in which the complained of act or failure to act took place. And, in the case of situations in which hearings are, for any reason delayed, the complainant shall thereafter, deposit the same amount of the monthly rent in an escrow account monthly until the complaint is resolved by decision of the hearing officer or hearing panel. Unless waived by the HA in writing, no waiver shall be given by the HA except in cases of extreme and undue hardship to the complainant, determined in the sole and absolute discretion of the HA.

B. **Time, Place, Notice**

- (1) Upon complainant's compliance with the prerequisites to a hearing set forth above, a hearing shall be scheduled by the hearing officer or hearing panel promptly for a time and place reasonably convenient to both the complainant and the HA, no later than the tenth (10th) business day after complainant has completed such compliance. (In the case of a panel, if all three appointed members of the panel are not able to agree upon a date



and time convenient to all panelists, on or before the last date before the hearing permitted under this procedure, they shall immediately so inform the HA. If two panelists can agree upon a date and time, the HA shall reappoint a third panelist who shall be available at the time agreed upon by two who can agree. If none of the panelists can agree upon a time, a new panel shall be appointed).

- (2) A written notification specifying the time, place, and the procedures governing the hearing shall be delivered to the complainant and the appropriate HA official, who, unless otherwise designated, shall be the Executive Director.

### *Procedures Governing Hearings*

#### **A. Fair Hearings**

The hearings shall be held before a hearing officer or hearing panel as directed above. The complainant shall be afforded a fair hearing, which shall include:

- (1) The opportunity to examine before the hearing any HA documents, including records and regulations that are directly relevant to the hearing.

The complainant shall be allowed to copy any such document at the complainant's expense. If the HA does not make the document available for examination upon request by the complainant, the HA may not rely on such document at the grievance hearing.

- (2) The right to be represented by counsel or other person chosen as the complainant's representative and to have such person make statements on the complainant's behalf.
- (3) The right to a private hearing unless the complainant requests a public hearing. The right to present evidence and arguments in support of the complainant's complaint, to controvert evidence relied on by the HA and to confront and cross-examine all witnesses upon whose testimony or information the HA or its management relies.
- (4) A decision solely and exclusively upon the facts presented at the hearing.

**B. Prior Decision in Same Matter**

The hearing panel or officer may render a decision without proceeding with the hearing if they determine that the issue has been previously decided in another proceeding.

**C. Failure to Appear**

If the complainant or the HA fails to appear at a scheduled hearing, the hearing officer or hearing panel may make a determination to postpone the hearing for a period not to exceed five (5) business days, or may make a determination that the party failing to attend has waived the right to a hearing. In such event, the hearing officer or hearing panel shall notify the complainant and the HA of the determination.

The failure to attend a grievance hearing shall not constitute a waiver of any right for which the complainant may have to contest HA's disposition of the grievance in an appropriate judicial proceeding.

**D. Required Showing of Entitlement to Relief**

At the hearing, the complainant must first make a showing of an entitlement to the relief sought and thereafter the HA must sustain the burden of justifying HA's action or failure to act against which the complainant is directed.

**E. Informality of Hearing**

The hearing shall be conducted informally by the hearing officer or hearing panel, and oral or documentary evidence pertinent to the facts and issues raised by the complaint may be received without regard to admissibility under the rules of evidence applicable to judicial proceeding.

**F. Orderly Conduct Required**

The hearing officer or hearing panel shall require the HA, the complainant, counsel, and other participants or spectators, to conduct themselves in an orderly fashion. Failure to comply with the directions of the hearing officer or hearing panel to obtain order may result in exclusion from the proceedings or in a decision adverse to the interests of the disorderly party and granting or denial of the relief sought, as appropriate.

**G. Transcript of Hearing**

The complainant or the HA may arrange in advance, and at the expense of the party making the arrangement, for a transcript of the hearing. Any interested party may purchase a copy of such transcript.

**H. Accommodation to Handicapped Persons**

The HA must provide reasonable accommodations for persons with disabilities to participate in grievance hearings. Reasonable accommodations may include qualified sign language interpreters, readers, accessible locations, or attendants.

*Decision of the Hearing Officer or Hearing Panel*

At or subsequent to the completion of the grievance hearing, the hearing officer or panel shall make a determination as to the merits of the grievance and the following provisions shall govern:

**A. Written Decision**

The hearing panel or officer shall prepare a written decision, together with the reasons for the decision within ten (10) business days after the completion of hearing

- (1) A copy of the decision shall be sent to the complainant and the HA. The HA shall retain a copy of the decision in the complainant's file.
- (2) A copy of such decision, with all names and identifying references deleted, shall also be maintained on file by the HA and made available for inspection by any prospective complainant, his representative, or the hearing panel or hearing officer.

**B. Binding Effect**

The written decision of the hearing officer or hearing panel shall be binding upon the HA, which shall take all actions, or refrain from any actions, necessary to carry out the decision unless HA's Board of Commissioners determines, within ten (10) business days, and properly notifies the complainant of its determination, that:

- (1) the grievance does not concern HA action or failure to act in accordance or involving the complainant's lease, or HA's regulations, which adversely affect the complainant's rights, duties, welfare or status, or
- (2) the decision of the hearing officer or hearing panel is contrary to applicable Federal, State, or local law, HUD regulations or requirements of the Annual Contributions Contract between HUD and the HA.

**C. Continuing Right of Complainant to Judicial Proceedings**

A decision by the hearing panel or officer or Board of Commissioners in favor of the HA or which denies the relief requested by the complainant, in whole or in part, shall not constitute a waiver of, nor affect in any way the rights of the complainant to a trial or judicial review in any judicial proceedings, which may thereafter be brought in the matter.

*Expedited Grievance Procedure*

- A. The expedited grievance procedure shall apply only to those grievances concerning a termination of tenancy or eviction that involves:
- Any criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises by other tenants or employees of the HA, or
  - Any drug-related criminal activity on or near the HA's premises.
- B. When the PHA notifies the tenant of a termination of tenancy or eviction that involves the above referenced violations, the HA shall also include in that notice that any grievance hearing requests shall be in accordance with the expedited grievance procedure.
- C. The complainant shall have five (5) business days from the date of the notice in which to file a written request for a hearing to the HA. The written request shall specify:
- The reasons for the grievance; and,
  - The action or relief sought.
- D. The complainant shall not have the grievance informally discussed as outlined in this policy.
- E. Within 24 hours of receipt by the HA of the complainant's request for a hearing, the Executive Director or designee shall notify the Resident Organization(s) of his/her selection of a hearing officer or hearing panel. The Resident Organization(s) shall have five (5) business days from the date of the notice to submit comments as to the selection of the hearing officer or hearing panel. Upon expiration of the five-(5) business day comment period, the Executive Director or designee shall have one (1) business day to review the comments and make a final selection as to the member(s) of the hearing officer or hearing panel.
- F. Upon complainant's compliance with subsection C of this section, a hearing shall be scheduled by the hearing officer or hearing panel promptly for a time and place reasonably convenient to both the complainant and the PHA, not in excess of five (5) business days of the selection of the hearing officer or hearing panel. A written notification specifying the time, place and the procedures governing the hearing shall be delivered to the complainant and the appropriate HA official.

### *Notices*

All notices under this grievance procedure shall be deemed delivered:

- (1) upon personal service thereof upon the complainant or an adult member of the complainant's household;
- (2) upon the date received for or refused by the addressee, in the case of certified or registered U.S. Mail; or
- (3) on the second day after the deposit thereof for mailing, postage prepaid, with the U.S. Postal Service, if mailed by first class mail other than certified or registered mail.

If a resident is visually impaired, any notice hereunder delivered to such resident shall be in an accessible format.

### *Modification*

This grievance procedure may not be amended or modified except by approval of a majority of the Board of Commissioners of the HA, present at a regular meeting or a special meeting called for such purposes. Further, in addition to the foregoing, any changes proposed to be made to this grievance procedure must provide for at least thirty (30) days advance notice to residents and resident organizations, setting forth the proposed changes and providing an opportunity to present written comments. The comments submitted shall be considered by the HA, before final adoption of any amendments hereto.

### *Miscellaneous*

- A. **Captions:** Captions or paragraph headings set forth in this grievance procedure are for convenience of reference only and shall not be construed or interpreted to affect the substance of the paragraphs or sections so captioned.
- B. **Concurrent Notice:** If a resident has filed a request for a grievance hearing hereunder in a case involving HA's notice of termination of tenancy, the complainant should be aware that the state law notice to vacate and the notice of termination of tenancy required under Federal law run concurrently. Therefore, if the hearing officer or hearing panel upholds HA's action to terminate the tenancy, the HA may commence an eviction action in court upon the sooner of the expiration of the date for termination of tenancy and vacation of premises stated in the notice of termination delivered to complainant, or the delivery of the report of decision of the hearing officer or panel to the complainant.

**6. Designated Housing for Elderly and Disabled Families**

Currently, the Housing Authority has two properties, Alabama Circle and Elder Circle, which are designated for elderly and/or disabled occupancy. The Housing Authority does not plan to designate any additional public housing specifically for elderly and/or disabled occupancy in the upcoming fiscal year.

**7. Community Service and Self-Sufficiency**

The Authority operates several programs which provide specific services to or activities for program participants. These include Family Self-Sufficiency, Elderly and Disabled Services, Neighborhood Stabilization, ROSS, Youth Services and After School Educational Program.

The Family Self-Sufficiency (FSS) Program is designed to prepare residents for economic self-sufficiency. Over a period of two to five years, participants will take the necessary steps for economic independence. Participants work closely with a case manager to map out goals that will aid them in becoming more independent. The FSS Case Managers will also connect the participants with the necessary community resources to help them complete their goals, as well as help provide supportive services.

The Elderly/Disabled Services Program provides services to all elderly, handicapped, and disabled residents. The program offers weekly and monthly events to residents in Elder Circle, Alabama Circle, Griffin Homes, Ingram Homes, and Thomas Homes. A monthly calendar of events and newsletter are distributed at the beginning of each month. The following is a sample of weekly/monthly activities:

- Shopping/Lunch: Wednesdays 11:00am-2:00pm
- Exercise Days (see calendar for dates and times)
- Educational and Fun Field Trips
- Picnics and Fellowship
- Recreational Activities: Arts & Crafts, Bingo, Cards, and Quilting

The Neighborhood Stabilization Program (NSP) provides emergency assistance to state and local governments to acquire and redevelop foreclosed properties that might otherwise become sources of abandonment and blight within their communities. Carrollton-Carroll County has received \$3.4 million from the Georgia Department of Community Affairs to acquire foreclosed residential real estate. After purchase and improvement, the properties will be sold to buyers who are eligible to participate in the Neighborhood Stabilization Program.

The ROSS Program's main focus is to coordinate supportive services and other activities designed to help public housing residents attain economic and housing self-sufficiency. Other areas of assistance include: Financial Literacy, How to Save Money, Dealing with Real Life Issues, Mentoring, Job Training, Skills Assessment, Soft Skills Training, Resume Writing, and Goal Setting.

The ROSS Services EMPOWERLINK program is currently available to Griffin Homes and Thomas Homes residents who have children between the ages of 4-18 years who also attend the City of Carrollton School System. Through collaboration with the Carrollton City School System, the Housing Authority of the City of Carrollton, the City of Carrollton, and the Carrollton City Schools Educational Foundation the EMPOWERLINK system now operates in the homes of public housing residents. The EMPOWERLINK system links public housing apartments directly to the City of Carrollton School System Network through the city's fiber optic cable. Now homes with school-age children are closer to closing the educational gap between the "haves" and "have-nots" through technological resources. These resources include home computers, the Carrollton City Schools network of learning tools and software, and access to the Internet.

The WIA Youth Program is funded by the West Central Georgia Workforce Investment Board. The West Central Georgia Workforce Investment Area is comprised of Butts, Carroll, Coweta, Heard, Lamar, Meriwether, Pike, Spalding, Troup, and Upson counties. The West Central Georgia Workforce Investment Board provides oversight for workforce investment activities. The purpose of the program is to provide training and work opportunities for economically disadvantaged youth ages 15-21 who live in the Carroll County Area.

The After School Program (ASP), After Hours, is an abstinence until marriage education program specifically designed for adolescents and teenagers between the grades 6th through 12th. The primary purpose of After Hours is to provide holistic abstinence education to adolescents and teens in a safe, teen friendly, nonjudgmental environment. In addition to abstinence education, the program also provides character education, refusal skills training, youth development, and education on setting goals and planning for the future.

In accordance with Federal Regulations, all non-exempt residents are required to perform eight (8) hours of community service each month. Exempt residents include all elderly and disabled residents and all residents under the age of 18. All employed residents are also exempt. The Authority maintains a log of community service documenting the hours performed by each non-exempt resident.

## **8. Safety and Crime Prevention**

For the most part, the Authority does not have a major crime and safety problem at any of its' developments. The Authority works closely with the local police department when a crime does happen on one of the properties. Monthly crime reports are given to the Authority by the Carrollton Police Department.

## 9. Pets

### *Purpose*

In compliance with Section 227 of Title II of the Housing and Urban-Rural Recovery Act of 1983, and with 24 CFR Parts 5, 243, 842, and 942, Final Rule, the Carrollton Housing Authority will permit residents of all housing projects built either for occupancy by the elderly and persons with disabilities or family residents, to own and keep common household pets in their apartment. This policy sets forth the conditions and guidelines under which pets will be permitted. This policy is to be adhered to at all times.

The purpose of the policy is to ensure that pet ownership will not be injurious to persons or property, or violate the rights of all tenants to clean, quiet, and safe surroundings.

### Common Household Pets are Defined as Follows:

**Birds:** Including canary, parakeet, finch and other species that are normally kept caged; birds of prey and domestic fowl are not permitted.

**Fish:** Tanks or aquariums are not to exceed 20 gallons in capacity. Poisonous or dangerous fish are not permitted. Only one (1) tank or aquarium is permitted per apartment.

**Dogs:** Not to exceed twenty (20) pounds or twenty (20) inches. All dogs must be neutered or spayed.

**Cats:** All cats must be neutered/spayed and declawed.

**Other:** Upon approval of the Executive Director

At no time will the Carrollton Housing Authority approve of exotic pets such as snakes, monkeys, rodents, etc.

### *Registration*

Every pet must be registered with the Carrollton Housing Authority's management prior to moving into the building and updated annually thereafter at the time of reexamination. The pet owner must be a member of the resident's household. The resident's file shall include the following documents (said documents shall be filed along with the resident's lease as they are part of the lease by reference):

- a. Pet owners registration form completely filled out and signed by the pet owner and witnessed by a representative of the Authority.
- b. A copy of these pet rules signed by the pet owner and witnessed by a Carrollton Housing Authority representative and properly dated.



- c. A certificate signed by a licensed veterinarian, State and local authority, stating that the pet has received all inoculations required by the State and local law, if applicable (dogs, cats).
- d. Proof of current license, if applicable (dogs, cats).
- e. Identification tag bearing the owner's name, address, and phone number (dogs, cats.)
- f. Proof of neutering/spaying and/or declawing, if applicable (dogs, cats.)
- g. Photograph (no smaller than 3x5) of pet or aquarium.
- g. The name, address, and phone number of a responsible party that will care for the pet if the owner becomes temporarily incapacitated.
- i. Fish - size of tank or aquarium.

*Density of Pets*

Only one (1) four-legged, warm-blooded pet will be allowed per apartment. Only two (2) birds will be allowed per apartment. The Carrollton Housing Authority only will give final approval on type and density of pets.

*Visitors and Guests*

No visitor or guest will be allowed to bring pets on the premises at anytime. Residents will not be allowed to Pet Sit or House a Pet without fully complying with this policy.

Feeding or caring for stray animals is prohibited and will be considered keeping a pet without permission.

*Pet Restraints*

- a. All dogs must be on a leash when not in the owner's apartment. The leash must be no longer than six (6) feet.
- b. Cats must be in a caged container when taken out of the owner's apartment.
- c. Birds must be in a cage when inside of the resident's apartment or entering or leaving the building.
- d. Any city, county or state rules governing the leashing of animals shall also apply.

*Sanitary Standards and Waste Disposal*

- a. Covered litter boxes must be provided for cats with use of odor-reducing chemicals.

- b. Dogs must be provided with a pet bed or box.
- c. Fur-bearing pets must wear effective flea collars at all times. Should extermination become necessary, cost of such extermination will be charged to pet owner.
- d. Dogs and cats shall not excrete anywhere within the building.
- e. Pet owners are responsible for immediate removal of the feces of their pet and shall be charged in instances where damages occur to Authority property due to pet or removal of pet feces by staff.
  - 1. All pet waste must be placed in a plastic bag and tied securely to reduce odor and placed in designated garbage dumpster outside of the building.
  - 2. Tenants with litter boxes must clean them at a minimum once per week. Noncompliance may result in removal of the pet. The Housing Authority reserves the right to impose a mandatory twice weekly litter box cleaning depending on need. Litter box garbage shall be placed in a plastic bag and deposited outside the building in the garbage dumpster.
  - 3. Pet owners are never to dispose of pet waste in the trash chutes in the buildings.
- f. All apartments with pets must be kept free of pet odors and maintained in a clean and sanitary manner. Pet owner's apartments may be subject to inspections once a month.

*General Rules*

The resident agrees to comply with the following rules imposed by the Carrollton Housing Authority:

- a. No pet shall be tied up anywhere on Authority property and left unattended for any amount of time. Pets shall be confined to the yard area that makes up the pet owners yard for exercise and deposit of waste, except, when routes to and from pet owners yard or apartment shall be on a sidewalk that has an area between the sidewalk and the street and any area adjacent to said sidewalk and street that does not have an apartment that belongs to another tenant, such area shall be known as community area.
- b. Pet owners will be required to make arrangements for their pets in the event of vacation or hospitalization.
- c. Dog houses are not allowed on Authority property.
- d. When outside, all pets must be accompanied by the resident owner of his/her designee.

### *No Pet Areas*

At no time will pets be allowed in any public area such as community buildings, laundry rooms, sitting rooms, etc. Pets should only be in the lobby when entering or leaving the building.

### *Pet Rule Violation and Pet Removal*

- a. If it is determined on the basis of objective facts, supported by written statement, that a pet owner has violated a rule governing the pet policy, the Carrollton Housing Authority shall serve a notice of pet rule violation on the pet owner. Violation of this policy will be considered as a violation of the lease agreement and the resident will be subject to such actions as prescribed in the lease agreement or violations of said agreement.
- b. If a pet poses a nuisance such as excessive noise, barking, or whining which disrupts the peace of other residents, owner will remove the pet from premises upon request of management within forty-eight (48) hours. Nuisance complaints regarding pets are subject to immediate inspections.
- c. If a pet poses a threat to the health or safety of other residents, the owner will remove the pet from the premises upon request of management within twenty-four (24) hours.
- d. If a pet owner becomes unable either through hospitalization or illness to care for the pet and the person so designated to care for the pet in the pet owner's absence refuses or is unable physically to care for the pet, after, said twenty-four (24) hour limitation. The Carrollton Housing Authority can officially remove the pet. The Authority accepts no responsibility for pets so removed.

### *Owners Responsibilities*

- a. Pet owners shall assume full responsibility for any vicious or destructive act by the pet.
- b. Pet owners shall be responsible for abiding by all federal, state and local laws and regulations as they may be changed from time to time.
- c. Pet owners agree to immediately remove an animal which has been determined to be vicious by Management until such time as a decision may be reached by agreement of by a grievance hearing.

### *Grievance*

Management and tenant agree to utilize the Grievance Procedure described in the Lease Agreement to resolve any dispute between tenant and management regarding a pet.

### *Pet Fee*

A nonrefundable “Pet Fee” will be required for dogs and cats only, however, all pet owners must comply with registration rules for all other pets. The “Pet Fee” must be paid in advance and is to be used to pay reasonable expenses directly attributable to the presence of the pet in the project including, but not limited to, the cost of repairs and replacements to, and fumigation of, the tenant’s dwelling unit. The amount of the “Pet Fee” will be \$300.

### *Non-Commercial Provisions*

No pet shall be raised, bred, kept, or trained for any commercial purpose.

### *Exceptions*

This policy does not apply to animals that are used to assist persons with disabilities. This exclusion applies to animals that reside in the development exclusively for the elderly or persons with disabilities, as well as animals used to assist persons with disabilities that visit the development. Pets used for the purpose of aiding residents with disabilities must have appropriate certification. The Authority shall maintain a list of agencies who provide and/or train animals to give assistance to individuals with disabilities.

### *Federal, State and Local Laws*

Pet Policy of the Carrollton Housing Authority includes by reference all applicable State and Local Laws.

## **10. Civil Rights**

Civil rights certifications are included in the PHA Plan Certifications of Compliance with the PHA Plans and Related Regulations.

## **11. Fiscal Audit**

The Fiscal Audit for the Year ended June 30, 2013 is attached to the Agency Plan as attachment ga116c01. The Fiscal Audit for the Year ended June 30, 2014 is in the process of being completed.

## **12. Asset Management**

The Authority has issued a Request for Proposals for qualified firms to complete the HUD-mandated Green Physical Needs Assessment on each of the Housing Authority’s public housing properties. Once completed, the GPNA will help the Authority with making decisions concerning physical improvements to each property.

### **13. Violence Against Women Act**

The Carrollton Housing Authority is striving to fully comply with all requirements of the Violence Against Women Act (VAWA).

First, the Authority will not deny admission to an applicant who has been a victim of domestic violence, dating violence, or stalking. The applicant must comply with all other admission requirements.

Also, the Authority will not terminate the assistance to a victim of domestic violence, dating violence, or stalking based solely on an incident or threat of such activity. The Authority still retains the right to terminate assistance for other criminal activity or good cause.

All information provided by an applicant or tenant regarding VAWA will be held in strict confidence and will not be shared with any other parties, unless required by law.

At this time, the Housing Authority does not intend to put a victim of domestic violence admissions preference in place. The Executive Director will periodically review the need for such preference and may add an admissions preference for victim of domestic violence if a need is determined.

To make sure all applicants are aware of the Violence Against Women Act, the Housing Authority notifies all applicants of the information included in the Act during the application process.

### **7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-Based Vouchers**

#### **(a) Hope VI or Mixed Finance Modernization or Development**

The Housing Authority does not plan to apply for a Hope VI or Mixed Finance Modernization or Development Grant in the upcoming Fiscal Year.

#### **(b) Demolition and/or Disposition**

The Housing Authority does not plan to submit a Demolition or Disposition Application for any of its' remaining public housing properties in the upcoming Fiscal Year.

#### **(c) Conversion of Public Housing**

The Housing Authority does not plan to convert any public housing to tenant-based Housing Choice Vouchers in the upcoming Fiscal Year.

**(d) Homeownership**

**Public Housing**

The Housing Authority does not plan to offer any public housing to residents for homeownership in the upcoming Fiscal Year.

**(e) Project-Based Vouchers**

The Housing Authority may choose to project-base up to 25 housing choice vouchers in the upcoming Fiscal Year. These project-based vouchers would be located outside of poverty areas within the City of Carrollton. This strategy is consistent with the Agency Plan because it helps to deconcentrate poverty.

**8.0 Capital Improvements**

**8.1 Capital Fund Annual Statement/Performance and Evaluation Report**

See attachments:

ga116a01 – FY2015 CFP Annual Statement

**8.2 Capital Fund Program Five-Year Plan**

See attachment:

ga116b01 – FY2015 - 2019 CFP Five-Year Plan

**8.3 Capital Fund Financing Program (CFFP)**

At this time, the Housing Authority has no plans to use the Capital Fund Financing Program.

## 9.0 Housing Needs

### Housing Needs of Families in the Jurisdiction/s Served by the PHA

Based upon the information contained in the Consolidated Plan/s applicable to the jurisdiction, and/or other data available to the PHA, provide a statement of the housing needs in the jurisdiction by completing the following table. In the “Overall” Needs column, provide the estimated number of renter families that have housing needs. For the remaining characteristics, rate the impact of that factor on the housing needs for each family type, from 1 to 5, with 1 being “no impact” and 5 being “severe impact.” Use N/A to indicate that no information is available upon which the PHA can make this assessment.

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Afford-ability	Supply	Quality	Access-ibility	Size	Loca-tion
Income <= 30% of AMI	1,246	5	4	3	3	3	3
Income >30% but <=50% of AMI	404	4	4	3	3	3	3
Income >50% but <80% of AMI	134	3	3	3	3	3	3
Elderly	363	4	3	4	4	3	4
Families with Disabilities	472	4	4	4	5	3	3
White	912	3	3	3	3	3	3
Black	755	3	3	3	3	3	3
Hispanic	125	3	3	3	3	3	3
Asian	10	3	3	3	3	3	3

What sources of information did the PHA use to conduct this analysis? (Check all that apply; all materials must be made available for public inspection.)

- Consolidated Plan of the Jurisdiction/s  
Indicate year:
- U.S. Census data: the Comprehensive Housing Affordability Strategy (“CHAS”) dataset
- American Housing Survey data  
Indicate year:
- Other housing market study  
Indicate year:
- Other sources: (list and indicate year of information)

## 9.1 Strategy for Addressing Housing Needs

### Strategies

**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
- Maintain or increase section 8 lease-up rates by establishing payment standards that will enable families to rent throughout the jurisdiction
- Maintain or increase section 8 lease-up rates by marketing the program to owners, particularly those outside of areas of minority and poverty concentration
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies

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

- Apply for additional section 8 units should they become available
- Pursue housing resources other than public housing or Section 8 tenant-based assistance.

**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



**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

**Need: Specific Family Types: The Elderly**

**Strategy 1: Target available assistance to the elderly:**

- Apply for special-purpose vouchers targeted to the elderly, should they become available

**Need: Specific Family Types: Families with Disabilities**

**Strategy 1: Target available assistance to Families with Disabilities:**

- 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

**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 needs

**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

### **Reasons for Selecting Strategies**

- 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

## **10.0 Additional Information**

### **(a) Significant Amendment and Substantial Deviation/Modification**

#### **A. Substantial Deviation from the 5-year Plan:**

A “Substantial Deviation” from the 5-Year Plan is an overall change in the direction of the Authority pertaining to the Authority’s Goals and Objectives. This includes changing the Authority’s Goals and Objectives.

#### **B. Significant Amendment or Modification to the Annual Plan:**

A “Significant Amendment or Modification” to the Annual Plan is a change in a policy or policies pertaining to the operation of the Authority. This includes the following:

- Changes to rent or admissions policies or organization of the waiting list.
- Additions of non-emergency work items over \$50,000(items not included in the current Annual Statement or 5-Year Action Plan) or change in use of replacement reserve funds under the Capital Fund.

- Any change with regard to demolition or disposition, designation, homeownership programs or conversion activities.

**(b) Memorandum of Agreement**

The Housing Authority is a High-Performing agency and therefore, does **not** have a Memorandum of Agreement with the United States Department of Housing and Urban Development at this time.

**(c) Resident Advisory Board Comments**

Other than general support of the contents of the FY2015 Agency Plan, there were no specific comments from the Resident Advisory Board.

**(d) Challenged Elements**

No elements of the FY2015 Agency Plan were challenged.

**(e) Off-Line Apartments**

At this time, the Authority is using three apartments for non-dwelling purposes. The apartment addresses and the current uses are listed below:

209 Newnan Road, Apt. 100 –Manna House  
209 Newnan Road, Apts. 108A and B – Youth Services Program Office

**(f) Rental Assistance Demonstration Program Information**

The Housing Authority has submitted a successful application for conversion under the Rental Assistance Demonstration (RAD). As a result, the Housing Authority is planning to convert 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 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 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 Public Housing Authorities with access to private sources of capital to repair and preserve their 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

may also borrow funds to address their capital needs. The Housing Authority will also be contributing Operating Reserves in the amount of \$150,000 and Capital Funds in the amount of \$150,000 towards the conversion. Both of these numbers are estimated and may be higher or lower depending upon the outcome of the Authority's Physical Condition Assessment.

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

**Development #1**

<b><u>Name of Public Housing Development:</u></b> Ingram Thomas Davis	<b><u>PIC Development ID:</u></b> GA116000001	<b><u>Conversion type (i.e., PBV or PBRA):</u></b> Project-Based Rental Assistance	<b><u>Transfer of Assistance:</u></b> No (if yes, please put the location if known, and # of units transferring)
<b><u>Total Units:</u></b> 118	<b><u>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</u></b>  118 – Family units	<b><u>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</u></b>  No changes	<b><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></b> \$165,446
<b><u>Bedroom Type</u></b>	<b><u>Number of Units Pre-Conversion</u></b>	<b><u>Number of Units Post-Conversion</u></b>	<b><u>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</u></b>
Studio/Efficiency			No Change
One Bedroom			No Change
Two Bedroom			No Change
Three Bedroom			No Change
Four Bedroom			No Change
Five Bedroom			No Change
Six Bedroom			
<b><u>(If performing a Transfer of Assistance):</u></b>	Not applicable		

**Development #2**

<p><b><u>Name of Public Housing Development:</u></b> Griffin Elder Circle</p>	<p><b><u>PIC Development ID:</u></b> GA116000002</p>	<p><b><u>Conversion type (i.e., PBV or PBRA):</u></b> Project-Based Rental Assistance</p>	<p><b><u>Transfer of Assistance:</u></b> No (if yes, please put the location if known, and # of units transferring)</p>
<p><b><u>Total Units:</u></b> 120</p>	<p><b><u>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</u></b>  40 – Family units  80 – Elderly units</p>	<p><b><u>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</u></b>  No changes</p>	<p><b><u>Capital Fund allocation of Development:</u></b> <b><u>(Annual Capital Fund Grant, divided by total number of public housing units in PHA, multiplied by total number of units in project)</u></b> \$159,982</p>
<p><b><u>Bedroom Type</u></b></p>	<p><b><u>Number of Units Pre-Conversion</u></b></p>	<p><b><u>Number of Units Post-Conversion</u></b></p>	<p><b><u>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</u></b></p>
<p>Studio/Efficiency</p>			<p>No Change</p>
<p>One Bedroom</p>			<p>No Change</p>
<p>Two Bedroom</p>			<p>No Change</p>
<p>Three Bedroom</p>			<p>No Change</p>
<p>Four Bedroom</p>			<p>No Change</p>
<p>Five Bedroom</p>			<p>No Change</p>
<p>Six Bedroom</p>			
<p><b><u>(If performing a Transfer of Assistance):</u></b></p>	<p>Not applicable</p>		

### **Resident Rights, Participation, Waiting List and Grievance Procedures**

Sections 1.7 B and 1.7 C of PIH-2012-32 REV-1 are incorporated as part of this Agency Plan. Those sections are included in the following pages.

### **Site Selection and Neighborhood Standards Review**

No Transfer of Assistance is planned. Therefore, this section is not applicable.

### **Relocation Plans**

No relocation plans are necessary since the Authority is only planning minor renovations to the current developments. All residents will be able to remain in their current unit.

### **Significant Amendment Definition**

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

- 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;
- Changes to the construction and rehabilitation plan for each approved RAD conversion; and
- Changes to the financing structure for each approved RAD conversion.