

HCV Admin Plan & ACOP
Public Comment Period: September 15 - October 17, 2016 & November 14 - December 14, 2016

Comment #	Individual/ Organization	Comment	CHA Response
1	Shanae95@yahoo.com	My comment on the updates on the proposal to me are fair. I believe that it helps people who are in need as well as give opportunity for more people to get the assistance they need to help better themselves.	Thank you for your comment.
2	Linda D. Ocasio <dominguezlinda332@yahoo.com>	Love it!!	Thank you for your comment.
3	Robert Whitfield <robertdwhitfield2@yahoo.com>	The summary of proposed changes to the current CHA HCV Administrative Plan does not contain any reference to the CHA HCV occupancy provision (page 5-1) governing the number of bedrooms approved for applicants and or current participants in the CHA HCV program. Participants in the HCV program have complained about the CHA HCV occupancy policy for many years because the CHA policy, as written does not allow for allotting a higher number of bedrooms for those families who have older children of opposite sexes.	Thank you for your comment. Current HCV policy does not require two people of the opposite sex to share a bedroom; rather, it allocates the number of bedrooms based on the number of individuals in the household. Participants are free to arrange their living situation as it suits their needs and comfortability. In addition, HCV's policy of two heartbeats to a room satisfies HUD cost saving measures mentioned in your comment. With the current policy in place, CHA is able to house the most participants possible with its limited funds.
4	Robert Whitfield <robertdwhitfield2@yahoo.com>	The CAC has also complained about the current policy. CHA convened a meeting in March to address this occupancy issue. A CHA staff person spoke at that meeting and appeared to reference cost savings as one reason for CHA not changing the HCV occupancy provision for determining the number of bedrooms for HCV families who have children of opposite sexes. A copy of the transcript from the March meeting with residents/participants is attached.	Thank you for your comment. Current HCV policy does not require two people of the opposite sex to share a bedroom; rather, it allocates the number of bedrooms based on the number of individuals in the household. Participants are free to arrange their living situation as it suits their needs and comfortability. In addition, HCV's policy of two heartbeats to a room satisfies HUD cost saving measures mentioned in your comment. With the current policy in place, CHA is able to house the most participants possible with its limited funds.
5	Robert Whitfield <robertdwhitfield2@yahoo.com>	What was not referenced by CHA staff during the March meeting was the HUD regulation for the HCV program that contains specific language that prohibits public housing authorities (PHAs) from requiring two people of opposite sexes (other than small children) to share a bedroom or other sleeping paces. The CHA staff person also did not reference the 2011 HUD Notice on HCV Cost savings measures. That Notice contains similar language prohibiting PHAs from utilizing policies that result in persons of opposite sexes (other than small children) having to share a bedroom. Copies of the HUD regulation and the 2011 HUD Notice are attached. CHA should consider reviewing its HCV occupancy policy to ensure that it confirms to the attached HUD regulatory provision, and the 2011 HUD Notice, both still in effect as of this date.	Thank you for your comment. Current HCV policy does not require two people of the opposite sex to share a bedroom; rather, it allocates the number of bedrooms based on the number of individuals in the household. Participants are free to arrange their living situation as it suits their needs and comfortability. In addition, HCV's policy of two heartbeats to a room satisfies HUD cost saving measures mentioned in your comment. With the current policy in place, CHA is able to house the most participants possible with its limited funds.
6	Robert Whitfield <robertdwhitfield2@yahoo.com>	The CHA draft addendum to the ACOP has a reference to the Gautreaux and scattered wait list and application policies and requirements, including a residency stipulation. It is puzzling that CHA still adheres to a decades old tenant selection and assignment plan that might have the present day effect (whether intended or not) of limiting minority HCV residency in non segregated areas of the City. CHA, as stated in a Seventh Circuit Gautreaux decision, retains the option to petition the Gautreaux court to modify an order. CHA should consider reviewing the attached 1990 Gautreaux order to determine if it should be modified or vacated altogether.	Thank you for your comment. The proposed update related to the Scattered Sites waitlist includes clarification language only; there are no new changes to the Gautreaux and Scattered Sites policies within the ACOP. 1) The Gautreaux court order impacts all 77 community areas within the city of Chicago. Each community area has a Scattered Sites waiting list, which requires applicants live in said community area at time of waitlist opening, at the time of screening, and unit offer. CHA will take your comment of reviewing the court order under advisement.

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7	Michelle Gilbert <mgilbert@lafchicago.org> Access Living Chicago Lawyers Committee for Civil Rights Under Law Housing Choice Partners, LAF	Chicago Area Fair Housing Alliance, and the member organizations listed below, submit the following comments on CHA's proposed changes to the Administrative Plan for the Voucher Program. While we are pleased with changes made to lessen the impact of criminal backgrounds, we believe that CHA can and should do more to assist voucher-holders who are subject to discrimination or at risk of losing their vouchers due to the challenge of seeking housing in communities of opportunity (a problem that has recently gotten considerable attention) and to implement best practices on criminal issues.	Thank you for your comment.
8	Michelle Gilbert <mgilbert@lafchicago.org> Access Living Chicago Lawyers Committee for Civil Rights Under Law Housing Choice Partners, LAF Sargent Shriver National	We urge CHA to remember that on these two issues, and all other issues, that its policies and day-to-day decision-making particularly impact the needs of tenants living with disabilities, who face barriers in securing housing and in interacting with CHA. CHA, consistent with its duty to affirmatively further fair housing, should do everything within its power to support voucher holders to successfully navigate the program and secure housing.	Thank you for your comment.
9	Michelle Gilbert <mgilbert@lafchicago.org> Access Living Chicago Lawyers Committee for Civil Rights Under Law Housing Choice Partners, LAF Sargent Shriver National Center on Poverty Law	I. Adopt Policies that Recognize Discrimination against Voucher-Holders. Discrimination against voucher-holders is well-documented. In 2010, CHA contracted with the Chicago Lawyers' Committee for Civil Rights Under Law to study discrimination in the Voucher Program, using testers. The study found that 59% of the landlords who already participated in the Voucher Program discriminated against new voucher-holders. Studying identified opportunity areas, the research found that 55% of these landlords refused to accept vouchers from white testers. Of the landlords willing to accept the voucher from white participants, 53% of those landlords refused to accept the voucher from African-American voucher tenants.	Thank you for your comment.
10	Michelle Gilbert <mgilbert@lafchicago.org> Access Living Chicago Lawyers Committee for Civil Rights Under Law Housing Choice Partners, LAF Sargent Shriver National Center on Poverty Law	The Chicago Commission on Human Relations reports that about half of housing discrimination complaints it receives allege source of income discrimination. City of Chicago Analysis of Impediments to Fair Housing Choice, https://www.cityofchicago.org/content/dam/city/depts/cchr/AdjSupportingInfo/AdjFORMS/2016%20Adjudication%20Forms/2016AltoFairHousing.pdf . ("From January 1, 2003 through December 31, 2013, the Commission received 773 complaints of discrimination in housing []. Though the Commission allows complainants to identify multiple bases for a complaint, the most frequent [basis was] ... source of income (49 percent). ... It is important to note that source of income is not a basis for discrimination under federal and state laws, and it was not considered a basis for discrimination in Cook County until recently. Therefore, the City of Chicago is the primary entity that addresses source of income discrimination in Illinois.")	(a) Thank you for your comment. On average 82% of participants and applicants are able to submit an RTA within the 90 day initial search period. After careful consideration, and weighing the interests of HUD requirements in timely reporting of such lease-ups, it has been determined that 90 days provides sufficient opportunity for voucher holders to find housing while keeping CHA within HUD's reporting mandates; (b) The HCV Program, as of this year, has changed its policies and forms to specifically allow for a voucher extension due to perceived or alleged discrimination; C) CHA does not terminate for voucher expiration. If a voucher expires, a participant loses his/her opportunity to lease-up and receive assistance. This is done in accordance with HUD regulations; (d) Thank you for your comment.

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11	Michelle Gilbert <mgilbert@lafchicago.org> Access Living Chicago Lawyers Committee for Civil Rights Under Law Housing Choice Partners, LAF Sargent Shriver National Center on Poverty Law	Despite discrimination against voucher-holders being illegal in the City of Chicago and Cook County, blatant discrimination persists. In June 2015, WBEZ studied Cook County Craigslist housing ads and found more than 200 that contained warnings that the landlord refused to accept vouchers. https://www.wbez.org/shows/wbez-news/section-8-voucher-holders-face-blattant-discrimination-on-craigslist/60a2494c-b3b4-4173-b229-ed5d6c517c71 .	(a) Thank you for your comment. On average 82% of participants and applicants are able to submit an RTA within the 90 day initial search period. After careful consideration, and weighing the interests of HUD requirements in timely reporting of such lease-ups, it has been determined that 90 days provides sufficient opportunity for voucher holders to find housing while keeping CHA within HUD's reporting mandates; (b) The HCV Program, as of this year, has changed its policies and forms to specifically allow for a voucher extension due to perceived or alleged discrimination; C) CHA does not terminate for voucher expiration. If a voucher expires, a participant loses his/her opportunity to lease-up and receive assistance. This is done in accordance with HUD regulations; (d) Thank you for your comment.
12	Michelle Gilbert <mgilbert@lafchicago.org> Access Living Chicago Lawyers Committee for Civil Rights Under Law Housing Choice Partners, LAF Sargent Shriver National Center on Poverty Law	Advocates, including the organizations endorsing these comments, who work with voucher tenants searching for housing realize that the combination of discrimination and limited search times cause some families to lose their assistance or to choose substandard housing in segregated, poor neighborhoods. DeLuca, et al., Why Don't Vouchers Do a Better Job of Deconcentrating Poverty? POVERTY & RACE (Sept./Oct. 2012). Researchers who study housing mobility specifically recommend increasing voucher search time as a tool for increasing utilization and economic mobility. Poverty & Race Research Action Council, Expanding Choice: Practical Strategies for Building a Successful Housing Mobility Program (February 2013) at 8.	(a) Thank you for your comment. On average 82% of participants and applicants are able to submit an RTA within the 90 day initial search period. After careful consideration, and weighing the interests of HUD requirements in timely reporting of such lease-ups, it has been determined that 90 days provides sufficient opportunity for voucher holders to find housing while keeping CHA within HUD's reporting mandates; (b) The HCV Program, as of this year, has changed its policies and forms to specifically allow for a voucher extension due to perceived or alleged discrimination; C) CHA does not terminate for voucher expiration. If a voucher expires, a participant loses his/her opportunity to lease-up and receive assistance. This is done in accordance with HUD regulations; (d) Thank you for your comment.
13	Michelle Gilbert <mgilbert@lafchicago.org> Access Living Chicago Lawyers Committee for Civil Rights Under Law Housing Choice Partners, LAF Sargent Shriver National Center on Poverty Law	In meetings with CAFHA members, advocates have explained to CHA that voucher tenants, despite their best efforts at housing searches, lose their assistance or chose substandard housing in low opportunity areas because of discrimination. While the Chicago Commission on Human Relations stands ready to combat discrimination, only a small portion of the voucher-holders we advise even report discrimination. Their primary concern must remain using their voucher to find housing so that they do not lose their housing assistance. Yet, notwithstanding these discussions and media attention to this problem and CHA's legal obligation to affirmatively further fair housing, CHA made no changes in this Administrative Plan that recognize this discrimination. We urge you to make the following changes to the Administrative Plan to address this concern:	(a) Thank you for your comment. On average 82% of participants and applicants are able to submit an RTA within the 90 day initial search period. After careful consideration, and weighing the interests of HUD requirements in timely reporting of such lease-ups, it has been determined that 90 days provides sufficient opportunity for voucher holders to find housing while keeping CHA within HUD's reporting mandates; (b) The HCV Program, as of this year, has changed its policies and forms to specifically allow for a voucher extension due to perceived or alleged discrimination; C) CHA does not terminate for voucher expiration. If a voucher expires, a participant loses his/her opportunity to lease-up and receive assistance. This is done in accordance with HUD regulations; (d) Thank you for your comment.
14	Michelle Gilbert <mgilbert@lafchicago.org> Access Living Chicago Lawyers Committee for Civil Rights Under Law Housing Choice Partners, LAF Sargent Shriver National Center on Poverty Law	a) Extend the initial search time on the voucher from 90 days to 120 days; b) Delineate specifically that discrimination is a reason for CHA to grant an extension to voucher search time and make clear that CHA will automatically grant extension when voucher-holders raise discrimination; c) End the practice of terminating participation for "expiration of search time" unless CHA has reason to believe that the tenant has not have made a demonstrated effort to identifying housing; and d) Provide for informal review of refusals to extend the voucher.	(a) Thank you for your comment. On average 82% of participants and applicants are able to submit an RTA within the 90 day initial search period. After careful consideration, and weighing the interests of HUD requirements in timely reporting of such lease-ups, it has been determined that 90 days provides sufficient opportunity for voucher holders to find housing while keeping CHA within HUD's reporting mandates; (b) The HCV Program, as of this year, has changed its policies and forms to specifically allow for a voucher extension due to perceived or alleged discrimination; C) CHA does not terminate for voucher expiration. If a voucher expires, a participant loses his/her opportunity to lease-up and receive assistance. This is done in accordance with HUD regulations; (d) Thank you for your comment.

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15	Michelle Gilbert <mgilbert@lafchicago.org> Access Living Chicago Lawyers Committee for Civil Rights Under Law Housing Choice Partners, LAF	CHA must also correct the Administrative Plan to reflect that, effective September 21, 2015, HUD requires CHA to suspend the term of the voucher during that period that CHA is processing the Request for Tenancy Approval. 24 C.F.R. § 982.303(c) (as amended by the Housing Choice Voucher Portability Revised Rule (FR-5453). The current draft continues the language that tenants must request an extension if they have submitted a Request for Tenancy Approval with search time remaining on their voucher that expires while CHA is processing the request. Draft, at page 5-2.	Thank you for your comment. CHA removed language stating tenants must request an extension if an RTA was submitted with search time remaining on their voucher and subsequently expires while processing, and now explicitly states the search time will freeze during this process.
16	Michelle Gilbert <mgilbert@lafchicago.org> Access Living Chicago Lawyers Committee for Civil Rights Under Law Housing Choice Partners, LAF	CHA has no discretion whether to make this change. An administrative plan must be in accordance with HUD regulations and requirements and PHAs must revise their administrative plans when needed to comply with HUD requirements. 24 C.F.R. 982.54(b). The fact that CHA's Procedures Guide correctly describes that CHA must suspend the term of the voucher does not resolve the problem of the dated language of the Plan.	
17	Michelle Gilbert <mgilbert@lafchicago.org> Access Living Chicago Lawyers Committee for Civil Rights Under Law Housing Choice Partners, LAF Sargent Shriver National Center on Poverty Law	II. Build on Positive Changes for Tenants who have Interacted with the Criminal Justice System. In PIH Notice 2015-19, HUD clarified how PHAs can use arrest and conviction records of participants. In April 2016, HUD General Counsel Helen R. Kanovsky recognized that because of widespread racial and ethnic disparities in the U.S. criminal justice system, arbitrary and overbroad criminal history-related limits on access to housing disproportionately burden African Americans and Hispanics and likely violate fair housing laws. These guidances have proven necessary to remove the broad, discretionary policies and practices of PHAs that have ultimately served to create unintended collateral consequences, most notably, family separation and housing instability, including, in some cases, homelessness.	Thank you for your comment. In accordance with HUD policy, CHA will not use an arrest solely as the basis for termination from the HCV program. If, however, the arrest triggers further inquiry in the criminal activity, the CHA may use this evidence as a basis for termination
18	Michelle Gilbert <mgilbert@lafchicago.org> Access Living Chicago Lawyers Committee for Civil Rights Under Law Housing Choice Partners, LAF Sargent Shriver National Center on Poverty Law	In recognition of these guidances from HUD, we are pleased to see changes that CHA has made: removing the family obligation requiring notification to CHA of a household member's arrest (Section 12-I.D); clarifying language in chapters 3 and 16, reflecting the HUD guidance, that an arrest record cannot be used as the sole reason for termination or denial (16-III.B and 3-III.C); revising its criminal look-back period for determining eligibility from 5 to 3 years (3-III.C. and 16-III.B); and no longer considering evidence of parole or recent release from prison as evidence of criminal activity (3-III.C. and 16-III.B).	Thank you for your comment. In accordance with HUD policy, CHA will not use an arrest solely as the basis for termination from the HCV program. If, however, the arrest triggers further inquiry in the criminal activity, the CHA may use this evidence as a basis for termination
19	Michelle Gilbert <mgilbert@lafchicago.org> Access Living Chicago Lawyers Committee for Civil Rights Under Law Housing Choice Partners, LAF Sargent Shriver National Center on Poverty Law	Although these are certainly steps in the right direction, we urge CHA to make additional changes, in light of the guidance from HUD. For example, we are concerned about overly discretionary language around drug-related and violent criminal activity; in both instances, CHA may terminate assistance if CHA determines that a household member has engaged in this activity regardless of whether the household member has been arrested or convicted for this activity (see 12-I. D). In consideration of the recently released HUD guidance, we believe that, under no circumstances, can CHA consider arrests without potentially running afoul of civil rights laws. Kanovsky guidance, April 2016.	Thank you for your comment. In accordance with HUD policy, CHA will not use an arrest solely as the basis for termination from the HCV program. If, however, the arrest triggers further inquiry in the criminal activity, the CHA may use this evidence as a basis for termination

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20	Michelle Gilbert <mgilbert@lafchicago.org> Access Living Chicago Lawyers Committee for Civil Rights Under Law Housing Choice Partners, LAF Sargent Shriver National Center on Poverty Law	We urge CHA to adopt provisions from the guidance's section on best practices. The guidance lists mitigating circumstances for PHA to consider in determining whether an individual poses a risk to the household or other tenants at admission and in termination decisions. CHA should make explicit in the Administrative Plan that it will consider the following mitigating circumstances in admissions: "b. The level of violence, if any, of the offense for which the applicant was convicted; c. Length of time since the conviction; d. The number of convictions that appear on the applicant's criminal history; and e. If the applicant is now in recovery for an addiction, whether the applicant was under the influence of alcohol or illegal drugs at the time of the offense." See PIH 2015-19 at 6.	Thank you for your comment. In accordance with HUD policy, CHA will not use an arrest solely as the basis for termination from the HCV program. If, however, the arrest triggers further inquiry in the criminal activity, the CHA may use this evidence as a basis for termination
21	Michelle Gilbert <mgilbert@lafchicago.org> Access Living Chicago Lawyers Committee for Civil Rights Under Law Housing Choice Partners, LAF Sargent Shriver National Center on Poverty Law	CHA should make explicit that it will consider the following mitigating circumstances in termination decisions: "a. The seriousness of the offending action, especially with respect to how it would affect other residents; b. The extent of participation or culpability of the leaseholder, or other household members, in the offending action, including whether the culpable member is a minor, a person with disabilities, or a victim of domestic violence, dating violence, sexual assault, or stalking; c. The effects that the eviction will have on other family members who were not involved in the action or failure to act; ... and h. The length of time since the violation occurred, the family's recent history, and the likelihood of favorable conduct in the future." Id. at 6-7. Providing for greater clarity regarding the assessment of mitigating circumstances could create more uniformity in determination outcomes. The guidance also notes that allowing applicants to address and present mitigating circumstances regarding criminal backgrounds prior to admission decisions has produced cost savings due to fewer decision appeals. Id. at 6.	Thank you for your comment. In accordance with HUD policy, CHA will not use an arrest solely as the basis for termination from the HCV program. If, however, the arrest triggers further inquiry in the criminal activity, the CHA may use this evidence as a basis for termination
22	Michelle Gilbert <mgilbert@lafchicago.org> Access Living Chicago Lawyers Committee for Civil Rights Under Law Housing Choice Partners, LAF Sargent Shriver National Center on Poverty Law	We urge CHA to remove the blanket use of medical marijuana as a basis for termination from the Voucher Program and reasonably accommodate the needs of individuals with medical marijuana approval from the State of Illinois. Contrary to the language of the Administrative Plan (Section 2-II.B), the HUD memorandum on "Medical Marijuana Use in Public Housing and Housing Choice Voucher Programs" (February 10, 2011) specifically states that the Quality Housing and Work Responsibility Act of 1998 (42 U.S.C. § 13661) does not require PHAs to terminate assistance for using medical marijuana and advises that PHAs have discretion whether to allow continued assistance for tenants who use medical marijuana. (HUD reaffirmed that PHAs are not required to adopt "One-Strike" policies in PIH notice 2015-19 at 2.) We decry CHA's failure to exercise its discretion to accommodate tenants living with disabling conditions that can be alleviated with medical marijuana and the disproportionate effect of that failure on the low income, largely African-American, community of Voucher tenants.	Thank you for your comment. CHA prohibits the use of controlled substances, including medical marijuana, on its property. Additionally, CHA does not permit the use of medical marijuana as a reasonable accommodation for any applicant or resident. The CHA will maintain its current policies which are in accordance with HUD regulations and guidance.

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23	Michelle Gilbert <mgilbert@lafchicago.org> Access Living Chicago Lawyers Committee for Civil Rights Under Law Housing Choice Partners, LAF Sargent Shriver National Center on Poverty Law	We reiterate that we are pleased to see the promising progress reflected in the proposed Administrative Plan changes; however, we urge CHA to include additional changes that reflect the best practices related to assistance eligibility and termination outlined in the HUD guidance. These best practices incorporate an enhanced assessment of indicators such as risk to household and other tenants, mitigating circumstances, the effects of termination on the household and the broader community, the length of time since criminal activity has occurred, and the likelihood of recidivism. As one of the largest PHAs in the country, in addition to the broad flexibility provided for through the Moving to Work program, the CHA should be at the forefront of crafting and executing policies and programs that best serve participating households, comply with civil rights laws, and affirmatively further fair housing.	Thank you for your comment.
24	Christopher Wilmes <cwilmes@HSPLEGAL.COM>	<p>These comments regarding the Chicago Housing Authority's proposed 2017 ACOP are submitted on behalf of the Central Advisory Council (CAC).</p> <ul style="list-style-type: none"> CHA says that it "will use the income targeting tier preferences to achieve a balance of low-income to extremely low-income families to whom it leases." It is not clear whether this means that CHA intends, in the future, to admit more or less applicants in the extremely-low income tier. The CAC proposes that the CHA admit more extremely-low income applicants, not less. Individuals in the extremely-low income tier are more likely to experience homelessness if not provided subsidized housing. 	Chapter II, Section E, Number 5 indicates the preferences based on Income Targeting for applicants. Tier I families are those considered extremely-low income families, within the 0-30% AMI. These families must constitute at least 50% of all admissions within any year. The second tier are households considered low income, within the 31%-80% AMI range. These households should account for no more than 50% of admissions in any year. The CHA will continue to maintain the above current levels.
25	Christopher Wilmes <cwilmes@HSPLEGAL.COM>	<ul style="list-style-type: none"> CHA proposes to institute site-based waiting lists for certain family public housing sites. The CAC believes that when CHA creates these site-based waiting lists, it should prioritize and give preference to residents on those properties who are living in overcrowded units and who need a split transfer. In other words, residents of an overcrowded public housing unit should receive preference on a site-based waiting list over all other applicants. 	CHA's 'right-sizing' initiative seeks to address under- and over-housed units by placing residents in appropriately sized apartments per current occupancy standards. If a family is overcrowded and the CHA does not have a unit large enough to house the entire household in accordance with our Occupancy Guidelines, and there are adult members in the household, the head of household must decide if all or part of the household will leave public housing within 60 calendar days. CHA's seeks to transition from its Traditional Family Waitlist to a Site-Based Waitlist. Existing applicants on the Traditional Family Waitlist will have the opportunity to select their property of choice before the waitlist is open to the general public. Family members who leave public housing due to overcrowding may apply to the Site-Based Waitlist once it has opened.
26	Christopher Wilmes <cwilmes@HSPLEGAL.COM>	<ul style="list-style-type: none"> CHA proposes to amend the Earned Income Disallowance rules in compliance with new HUD rules. While the CAC obviously has no objection to CHA following the new rules, the CAC asks CHA to remind property managers that they should always offer a resident the opportunity to use the Earned Income Disallowance when the resident's income increases. Even if a resident does not request to use the Earned Income Disallowance, the property manager should offer it to the resident as an option. 	It is recommended that Property Managers always discuss EID to eligible residents as an option.

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27	Michelle Gilbert <mgilbert@lafchicago.org>	LAF is the largest provider of civil legal services in Cook County. Each year, LAF advises or represents thousands of families with legal problems related to their housing. In addition, LAF staff advises and represents organized groups of tenants, as well as engages in law reform on issues related to housing low income tenants. LAF participated in and endorses the comments submitted by the Chicago Area Fair Housing Alliance and submits these additional recommendations for changes to the Administrative Plan for the Housing Choice Voucher program.	Thank you for your comment.
28	Michelle Gilbert <mgilbert@lafchicago.org>	A. Repayment plans. CHA must follow directives and guidances from HUD. With regard to reporting income, PHAs must follow the "Administrative Guidance for Effective and Mandated Use of the Enterprise Income Verification (EIV) System." PIH 2010-19 (HA) (extended by PIH 2013-23 (HA) and extended indefinitely by PIH 2015-2 (HA)). PIH 2010-19 requires that "monthly retroactive rent payment plus the amount of rent the tenant pays at the time the repayment agreement is executed should be affordable and not exceed 40 percent of the family's monthly adjusted income." Id. at 15. PIH 2010-19 (HA) further provides that repayment agreements must include language providing that the "terms of the agreement may be renegotiated if there is a decrease or increase in the family's income." Id. at 14. It further provides that the length of the repayment agreement "is based on the monthly payments and original retroactive balance" and does not set a maximum amount of time for the repayment agreement to last. Id. at 15. PIH 2010-19 (HA) does not set a maximum amount that PHAs may include in a repayment agreement. The requirement that repayment agreements be affordable is consistent with the Presidential directive that efforts to reduce improper payment and waste in government programs should proceed in a way that ensures that federal programs continue to serve and provide access to their intended beneficiaries. Executive Order 13250, issued November 23, 2009.	Thank you for your comment.
29	Michelle Gilbert <mgilbert@lafchicago.org>	While this PIH notice gives PHAs some "discretion to establish thresholds and policies for repayment agreements in addition to HUD required procedures" (id. at 15), it does not authorize CHA to adopt policies that are directly contradictory the requirements of the guidance, such as requiring payments plans that end within 12 months regardless of the families' income. Proposed plan at 14-2. We urge CHA to follow HUD directives and allow Voucher tenants reasonable repayment agreements to enable their continued participation in this critical program.	Thank you for your comment.
30	Michelle Gilbert <mgilbert@lafchicago.org>	B. Voucher Size Policy: CHA should amend its Voucher (bedroom) size policy to consider the age and gender of children when calculating the Voucher size. The current policy forces Voucher assisted families to choose between housing teenage children of different genders in the same bedroom and maintaining affordable rent.	Thank you for your comment. Current HCV policy does not require two people of the opposite sex to share a bedroom; rather, it allocates the number of bedrooms based on the number of individuals in the household. Participants are free to arrange their living situation as it suits their needs and comfortability. In addition, HCV's policy of two heartbeats to a room satisfies HUD cost saving measures mentioned in your comment. With the current policy in place, CHA is able to house the most participants possible with its limited funds.

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31	Michelle Gilbert <mgilbert@lafchicago.org>	C. Minimum Rent/Hardship Exemption: CHA should change its minimum rent of \$75. CHA has never received MTW authority from HUD to charge Voucher families a minimum rent over the statutory limit of \$50 per month. CHA should establish and implement policies that would ensure that families are apprised in a timely and clear manner about their right to request a hardship exemption to the minimum rent. When CHA sets the family's rent at the minimum amount or adjusts the family's rent to the minimum amount, CHA should provide the family with written notice that the family may be entitled to a hardship exemption to the minimum rent. This information, which must explain the procedure for requesting a hardship exemption, may be included in a rent adjustment notice in a font larger than the rest of the notice and highlighted.	Thank you for your comment.
32	Elizabeth Rosenthal <erosenthal@lafchicago.org>	We write to comment on the Proposed ACOP, Lease, and Grievance Procedure. We have written separately to comment on the proposed HCV Administrative Plan. LAF provides free civil legal services to people living in poverty in Cook County, and the agency's Housing Practice Group represents public housing residents affected by the proposed ACOP, Lease, and ACOP Grievance Procedure. I. PROPOSED ACOP A. Section I: Nondiscrimination. CHA should not prohibit residents from using medical marijuana when they have obtained a prescription to use this drug to treat an injury or disease that interferes with one or more major life activities. On May 17, 2013, the Illinois legislature passed a medical marijuana bill and it was signed into law on August 1, 2013. This state law – The Compassionate Use of Medical Marijuana Pilot Program Act, 410 ILCS 130/1 et seq. – conflicts with the Controlled Substances Act, 21 U.S.C. § 801 (which defines marijuana as a Schedule 1 substance that may not be prescribed by a physician) and is therefore subject to federal preemption, but you still have discretion to allow your residents to use medical marijuana. In a memorandum dated February 10, 2011, HUD's Assistant Secretary for Public and Indian Housing confirmed that PHA's are not required to evict a resident for using medical marijuana.	Thank you for your comment. CHA prohibits the use of controlled substances, including medical marijuana, on its property. Additionally, CHA does not permit the use of medical marijuana as a reasonable accommodation for any applicant or resident. The CHA will maintain its current policies which are in accordance with HUD regulations and guidance.
33	Elizabeth Rosenthal <erosenthal@lafchicago.org>	We urge you, therefore, to exercise your discretion to refrain from pursuing such evictions. If you refuse to exercise this discretion, public housing tenants will, together with other federally subsidized housing residents, become the only people in Illinois who are prohibited from using a drug that a licensed physician has prescribed to treat cancer, AIDS, muscular dystrophy, multiple sclerosis, or some other serious condition. Put another way, the only Illinois residents who will be subject to the prohibition against medical marijuana will be the State's most vulnerable citizens. You can avoid such an unconscionable and cruel result by exercising your discretion to refrain from evicting public housing residents for possessing and using medical marijuana. The tenants who use this drug do not, as a result of their use, pose any kind of threat to management or other tenants, and they should not be forced to choose between maintaining their housing and alleviating their suffering.	Thank you for your comment. CHA prohibits the use of controlled substances, including medical marijuana, on its property. Additionally, CHA does not permit the use of medical marijuana as a reasonable accommodation for any applicant or resident. The CHA will maintain its current policies which are in accordance with HUD regulations and guidance.

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34	Elizabeth Rosenthal <erosenthal@lafchicago.org>	<p>B. Section II: Processing of Applications and Eligibility for Admission.</p> <p>CHA should reconsider its proposal to deny mitigation hearings to tenants who are being removed from the waiting list. Page 9. We have represented clients who were removed from this list because they never received a mailed notice (sometimes because the letter was sent to the wrong address, or because the client has a broken mailbox), and these individuals should be given an opportunity to contest their removal. The administrative burden and cost of providing a mitigation hearing is low, and it is far outweighed by the potential benefit to a low-income family that desperately needs public housing.</p> <p>CHA should never deny an individual's application for public housing based on that individual's failure to meet past financial obligations. Page 15. Most people who are financially eligible for public housing will have bad credit, but a low-income individual's failure to pay market rent (or to meet other financial obligations, such as utility bills, while struggling to pay market rent) is not indicative of his or her ability to pay income-based rent as a public housing resident.</p>	The only ACOP updates regarding Mitigation Hearings refers to waitlist update periods. Other language added was for clarification purposes that applicants who fail to update their information during waitlist update periods are removed from the waiting list and are not entitled to a mitigation hearing. CHA will consider failure to respond to updates based on reasonable accommodation requests.
35	Elizabeth Rosenthal <erosenthal@lafchicago.org>	<p>C. Section IV: Leasing Policies.</p> <p>The ACOP currently provides that when a unit becomes overcrowded, the household must decrease its size or face eviction. This policy violates the federal regulations that set forth the only reasons a PHA may terminate a family's lease agreement. See 24 C.F.R. § 966.4(l)(2). CHA should be housing low-income families who are financially eligible for assistance and do not pose a threat to others; not looking for additional reasons to evict them from the only safe, decent housing they can afford. When a unit become overcrowded, CHA should relocate the family to an appropriately-sized unit, or give the family a split transfer and/or offer the family a housing choice voucher.</p>	CHA's 'right-sizing' initiative seeks to address under- and over-housed units by placing residents in appropriately sized apartments per current occupancy standards.
36	Elizabeth Rosenthal <erosenthal@lafchicago.org>	<p>Live-in-aides should not be subject to "all" admissions screening criteria. Page 30. A live-in aide's income is not used to calculate the household's rent, and a live-in-aide is not responsible for making rent or utility payments. The only relevant screening criteria, therefore, is the live-in aide's criminal background, which could be relevant to legitimate safety concerns. CHA should revise its current policy to ensure that that suitable live-in-aides are not excluded for reasons that do not affect health and safety. Applying other standards could violate CHA's obligations under the FHA to grant reasonable accommodations to people with disabilities.</p> <p>CHA's current language regarding prohibited activities in common areas is ambiguous and could be read to mean that all meetings, activities and events are prohibited. Page 32, ¶ c. It should be clarified to read that only "religious" programs, activities, and events are prohibited.</p>	Thank you for your comment.
37	Elizabeth Rosenthal <erosenthal@lafchicago.org>	<p>D. Section V: Transfer Policy.</p> <p>Families residing in overcrowded units should be given split family transfer and/or offered a housing choice voucher if CHA cannot relocate the family to an appropriately-sized unit. (See above.)</p>	CHA's 'right-sizing' initiative seeks to address under- and over-housed units by placing residents in appropriately sized apartments per current occupancy standards.

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38	Elizabeth Rosenthal <erosenthal@lafchicago.org>	<p>E. Section VI: Re-examinations of Income and Family Circumstances.</p> <p>CHA currently considers “non-monetary contributions” as income. Pages 43 and 62. We assume this policy is based on the federal regulation stating that annual income includes “all amounts, monetary or not . . .” 24 C.F.R. § 5.609(a). CHA, however, provides no guidance as to what “non-monetary contributions” include. This can lead not only to confusion, but to miscalculated rent amounts and perhaps even evictions for failing to report such non-monetary contributions. We suggest, therefore, that CHA remove the non-monetary contributions language, especially since the agency is trying to streamline its re-examination procedures.</p> <p>Following new HUD rules, CHA has included language stating that a resident or applicant cannot have “an ownership interest in property that is suitable for occupancy.” Pages 43 and 62. CHA needs to clarify what “suitable for occupancy” means. LAF had a client who received rental assistance under a federal program, but whose name was on the title to a property occupied by a grandmother and a sibling who cared for her [the grandmother]. There was not room for our client. It is not clear whether a public housing resident in this situation would remain eligible for continued occupancy under this new rule.</p>	<p>Non-Monetary contributions must be counted as income because of the possibility of the contribution recurring, and therefore changing the expenses a resident is obligated to pay. Interest, dividends, and other net income of any kind from real or personal property are utilized while calculating income and determining rent. Income allowed and disallowed is listed in Chapter 11 of the ACOP.</p>
39	Elizabeth Rosenthal <erosenthal@lafchicago.org>	<p>CHA should revise the “remaining family members” provisions of the ACOP. Page 45. First, an authorized household member should be allowed to assume the lease after the head of household dies or vacates the premises even if that household member has not resided in the unit for the past three consecutive years. Federal law does not impose such a “three year” requirement, and there is no rational purpose for the rule. Any person who was an authorized household member (or recognized as such) before the head of household died or vacated the unit should be entitled to “remaining household member” status. Second, when the only remaining family members are unable to contract because of age or a disability, CHA should be required to screen any individual who is able to contract and willing to become the new head of household. Though CHA may certainly deny this individual’s application if he or she fails the screening process, CHA should not have discretion to refuse to even screen the individual.</p>	<p>Thank you for your comment. The 36-month time frame for family members to take over the lease is monitored by CHA to ensure correct Occupancy. The ACOP also permits for extenuating circumstances when it comes to remaining family members, and therefore accounts for circumstances for individuals who might not have resided in the unit for 36 consecutive months or not at all.</p>
40	Elizabeth Rosenthal <erosenthal@lafchicago.org>	<p>CHA applies the community service requirement to residents between the ages of 55 and 61 who are exempt from the work requirement. Pages 46, 52, and 54. CHA should clarify, however, that such individuals may still be entitled to an exemption from the community service requirement if, for example, they are people with disabilities or caregivers for people with disabilities.</p> <p>CHA should amend the ACOP to include an exemption to the work requirement for parents who are caring for a child under the age of one. This exemption is referenced on page 54 but not on page 47. Furthermore, the exemption should be available to a two-parent household caring for a child under age one, and not just to a single-parent household as the policy states. Page 54.</p>	<p>Thank you for your comment.</p>
41	Elizabeth Rosenthal <erosenthal@lafchicago.org>	<p>F. Section VIII: CHA Work Requirement Policy.</p> <p>CHA should list the specific exemptions from the Community Service Requirement.</p>	<p>Please refer to Chapter VI., Section G. Number 8 for a listing of Community Service and Economic Self-Sufficiency exemptions.</p>

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42	Elizabeth Rosenthal <erosenthal@lafchicago.org>	G. Section XI: Determining Income and Rent. CHA should amend its minimum rent policies. Page 67. CHA does not currently take reasonable steps to adequately inform residents of their right to request a hardship exemption to the minimum rent requirement. CHA should require its property managers to inform each resident, at both the initial lease signing and at every subsequent recertification meeting, about both the resident's right to request a hardship exemption and the process for making such a request. Furthermore, CHA should inform residents about the right to the hardship exemption, and the process for making this request, in every notice of rent adjustment, and in every termination notice that is issued for nonpayment of rent. Finally, property managers should automatically process a hardship exemption for every household that has no income.	Thank you for your comment. Property Management makes residents aware of the minimum hardship exemption.
43	Elizabeth Rosenthal <erosenthal@lafchicago.org>	H. Pet Policy. CHA should not require tenants to pay an application fee when seeking permission to get a pet. Requiring such a fee does not, like a security deposit, ensure the condition of CHA's property. It merely discourages residents from having pets.	The pet application fee ensures pet accountability by the owner.
44	Elizabeth Rosenthal <erosenthal@lafchicago.org>	II. PROPOSED LEASE We have just two comments. First, for the reasons set forth above in this letter, CHA should amend Section 21(g) to clarify that residents between the ages of 55 and 61 who are exempted from the work requirement may also be exempted from the community service requirement if, for example, they are people with disabilities or caregivers for people with disabilities. Second, for the reasons set forth above in this letter, CHA should remove from the definition of "remaining family members" the requirement that the individual must have resided in the premises for the past three consecutive years.	Thank you for your comment.
45	Elizabeth Rosenthal <erosenthal@lafchicago.org>	III. PROPOSED GRIEVANCE PROCEDURE A. Section I – Purpose. In section I.C., CHA clarifies that the Grievance Procedure is a process used "prior to the filing of any judicial proceeding." This is helpful, but it should be further clarified to confirm that a resident need not to the Grievance Procedure prior to filing his or her own suit against CHA and/or its property management firms.	Thank you for your comment.
46	Elizabeth Rosenthal <erosenthal@lafchicago.org>	B. Section II – Applicability. Section II.A.C. states that the grievance procedure applies to residents living in mixed income developments "where any part of the CHA Grievance Procedure was adopted." The grievance procedure, however, applies to all CHA residents, so the language that appears in the quotation marks above should be removed.	Thank you for your comment.
47	Elizabeth Rosenthal <erosenthal@lafchicago.org>	C. Section III – Definitions. For the reasons set forth above in this letter, remaining member status should not be restricted to authorized household members who have resided in the unit for the past three consecutive years. It should be conferred on anyone who was an authorized household member, or was recognized as such, when the head of household died or vacated the premises.	Thank you for your comment.

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48	Elizabeth Rosenthal <erosenthal@lafchicago.org>	D. Section IV – Grievances to which this procedure is applicable. The provision on escrowing rent should be eliminated in light of HUD’s final rule removing this requirement. See Notice PIH 2016-05(HA). Although HUD permits PHAs to maintain their current procedures in place immediately before this final rule, this provision prejudices residents who dispute their rent amounts and cannot afford to pay rent that has been incorrectly calculated.	Thank you for your comment.
49	Elizabeth Rosenthal <erosenthal@lafchicago.org>	E. Section V – Grievances to which this procedure is not applicable. Section A.2. states that the grievance policy does not apply to any violent or drug-related criminal activity, but the 2016 revisions impermissibly expand on the federal definition of drug-related criminal activity to include “the illegal . . . possession, storage, service, delivery, or cultivation of a controlled substance, including medical marijuana.” CHA should just use the federal definition. Furthermore, for the reasons stated above in this letter, CHA should not prohibit the use of medical marijuana.	Thank you for your comment.
50	Elizabeth Rosenthal <erosenthal@lafchicago.org>	F. Section VII – Notice of Adverse Action. CHA states that “[a]dverse actions of an emergency nature will not require prior written notice.” The federal regulations, however, require PHAs to provide notice of and an opportunity to dispute “any PHA action or failure to act.” 24 C.F.R. § 966.50. Instead of attempting to carve out an exception to this requirement, CHA should set forth the types of notice it may provide before taking “adverse action” in an emergency situation (e.g., by phone, text, e-mail).	Thank you for your comment.
51	Elizabeth Rosenthal <erosenthal@lafchicago.org>	G. Section X – CHA Ombudsman. CHA should clarify that the resident may bring to a grievance hearing his or her own representative.	Thank you for your comment.
52	Elizabeth Rosenthal <erosenthal@lafchicago.org>	H. Section XI – Requests for Informal Hearing. Section XI.A.2 should be amended to clarify that all CHA residents, including those living in mixed-income developments, are entitled to informal grievance hearings. Section XI.C states that a head of household “shall file” any request for a grievance hearing. Substitute the word “request” for “file” to clarify the fact that the resident may make an oral request.	Thank you for your comment.
53	Elizabeth Rosenthal <erosenthal@lafchicago.org>	I. Section XII – Informal Hearing Process. Section F.1. states that the informal hearing results may be mailed to the resident head of household, and the 2016 revisions provide that “receipt is considered to have occurred five calendar days after the date of mailing.” This does not take into account the fact that the informal hearing results may not get delivered and be mailed back to CHA or its property management firm. Therefore, Section F.1. should state that “receipt is considered to have occurred . . . unless the informal hearing results are returned to the sender or CHA or its property management firm is otherwise notified that the results were not received.”	Thank you for your comment.

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54	Elizabeth Rosenthal <erosenthal@lafchicago.org>	<p>J. Section XIV – Requests for a Formal Hearing.</p> <p>Section XIV.A.2 should be amended to clarify that all CHA residents, including those living in mixed-income developments, are entitled to formal grievance hearings.</p> <p>The procedure for requesting a formal grievance hearing is unduly burdensome, especially for residents with disabilities. The ACOP should clarify that tenants with disabilities are entitled to reasonable accommodations (e.g., making an oral request to a manager who must then complete the necessary paperwork).</p>	Tenants with disabilities are entitled to reasonable accommodations per the CHA Resident's Grievance Procedure
55	Elizabeth Rosenthal <erosenthal@lafchicago.org>	<p>K. Section XVI – Formal Hearing Process.</p> <p>In Section H.1., CHA proposes reducing from 14 days to 7 days the advance notice that DOAH must provide to the resident head of household, CHA, and its property management firms regarding the date, time, and location of the formal hearing. Considering our clients' schedules, (which are often inflexible and difficult to adjust), delays in receiving mail, and the residents' need to coordinate with their legal representatives, this change should be removed.</p>	Thank you for your comment.
56	Samantha Tuttle <STuttle@heartlandalliance.org>	<p>We write today to comment on the Chicago Housing Authority's ("CHA") proposed amendments to the Administrative Plan ("admin plan") and the Admissions and Continued Occupancy Policy ("ACOP"). We commend the CHA for taking some important steps toward a fairer system for people with criminal records with these proposed amendments. As HUD's recent guidance makes clear, use of criminal records in housing determinations can have a disparate impact on communities of color. We hope to work with the CHA to continue to address fairness and equity while expanding housing opportunities for people in need of housing.</p>	Thank you for your comment.
57	Samantha Tuttle <STuttle@heartlandalliance.org>	<p>Comments on the Administrative Plan:</p> <p>Arrest Records (Sections 3-III.C and 16-III.B):</p> <p>While we applaud HUD and the CHA for recognizing that arrest records are not appropriate grounds for denial of assistance or termination, we are concerned with the proposed policy regarding arrests as drafted and urge the CHA to amend the language to be in full compliance with HUD's recent PIH 2015-19 notice.</p>	Thank you for your comment. In accordance with HUD policy, CHA will not use an arrest solely as the basis for termination from the HCV program. If, however, the arrest triggers further inquiry in the criminal activity, the CHA may use this evidence as a basis for termination.
58	Samantha Tuttle <STuttle@heartlandalliance.org>	<p>Throughout the admin plan, the CHA asserts that it will not use arrests "solely" as grounds for denials/termination. This implies that an arrest may be ground for termination in combination with other information. And Section 16-III.B provides that evidence of drug-related/violent criminal activity includes, but is not limited to, "any arrests for drug-related/violent criminal activity within the past three years if substantiated by corroborating evidence."</p>	Thank you for your comment. In accordance with HUD policy, CHA will not use an arrest solely as the basis for termination from the HCV program. If, however, the arrest triggers further inquiry in the criminal activity, the CHA may use this evidence as a basis for termination.

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59	Samantha Tuttle <STuttle@heartlandalliance.org>	But, HUD's notice makes clear that while "[a]n arrest record can trigger an inquiry into whether there is sufficient evidence for a PHA or owner to determine that a person engaged in disqualifying criminal activity," and arrest "is not itself evidence on which to base a determination." The PIH notice, therefore, does not provide that an arrest can be used as evidence in combination with other information – it provides that an arrest is not evidence at all. Arrest information should be limited to prompting the CHA to look for actual evidence of criminal activity when appropriate. Data has shown that poorer communities and communities of color are disproportionately impacted by arrests and that those with a criminal background are best served by stable housing and employment in order to become contributing members of their community. A fairer methodology for making sound decisions relies direct evidence that has a greater probative merit.	Thank you for your comment. In accordance with HUD policy, CHA will not use an arrest solely as the basis for termination from the HCV program. If, however, the arrest triggers further inquiry in the criminal activity, the CHA may use this evidence as a basis for termination.
60	Samantha Tuttle <STuttle@heartlandalliance.org>	We urge the CHA to remove "any arrests for drug-related/violent criminal activity within the past three years if substantiated by corroborating evidence" from the list of evidence that may support termination in Section 16-III.B. We also urge the CHA to clarify that arrest activity is not a basis to deny or terminate participation in the program at all, by removing the term "solely" from provisions like "[t]he CHA will not deny assistance solely upon the basis of an applicant's arrest record," throughout the administrative plan.	Thank you for your comment.
61	Samantha Tuttle <STuttle@heartlandalliance.org>	Look-back period (Sections 3-III. C. and 16-III.B): We applaud the CHA for revising its criminal look-back period for determining eligibility and continued participation in the program and for providing that it will no longer consider evidence of parole or recent release from prison as evidence of criminal activity. We encourage the CHA to continue to remove blanket barriers to housing for people with criminal records in its policies and practices.	Thank you for your comment.
62	Samantha Tuttle <STuttle@heartlandalliance.org>	Flexibility for Survivors of Trafficking and Trauma: We commend the CHA for its recent allocation of 60 vouchers for survivors of human trafficking. Trafficking survivors may have additional challenges managing the HCV program that stem from their history of exploitation and abuse. For example, a person experiencing trauma may be intimidated by a moving papers briefing, have language access challenges, or be nervous about letting others into their unit, complicating HQS. Indeed, trauma can affect memory itself, making it more difficult for survivors to navigate the program. We therefore recommend that the CHA add an additional section to the admin plan that provides flexibility on program requirements and family obligations for survivors of trauma and trafficking in order to help ensure their successful participation in the program. We further recommend that the CHA extend the confidentiality provisions for survivors of domestic violence, dating violence, sexual assault and stalking to survivors of trafficking, who have similar confidentiality concerns.	Thank you for your comment.

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63	Samantha Tuttle <STuttle@heartlandalliance.org>	<p>Comments on the ACOP: Processing of Applications and Eligibility for Admission (Section II): CHA's proposed ACOP specifically provides that an individual on the waitlist does not have a right to a mitigation hearing for being removed from the waiting list. As a provider for survivors of violence and trauma, individuals with mental illness and substance use disorder, and people who experience chronic homelessness, we have grave concerns with this provision. Often, these individuals must prioritize meeting their emergent needs in a crisis over other obligations, or for those fleeing violence or experiencing homelessness, simply don't have an address for periods of time. The purpose of public housing is in part to provide families experiencing poverty with stable housing. It would be a shame then to punish those on the public housing waitlist who are unstably housed for the very problem public housing intends to solve.</p>	<p>The only ACOP updates regarding Mitigation Hearings refers to waitlist update periods. Other language added was for clarification purposes that applicants who fail to update their information during waitlist update periods are removed from the waiting list and are not entitled to a mitigation hearing. CHA will consider failure to respond to updates based on reasonable accommodation requests.</p>
64	Samantha Tuttle <STuttle@heartlandalliance.org>	<p>CHA should look to Illinois's experience with Medicaid redeterminations for indication about how challenging it can be for individuals and families experiencing poverty to receive and respond to mailings, even when critical services are involved. Of the 47% of people are canceled each time they are redetermined under Illinois's Medicaid program, 77% of those are for lack of response to mailings. An unforgiving policy is simply an inappropriate fit for those who are unstably housed, struggling to meet even their most basic needs, or who may be experiencing violence.</p> <p>Finally, the proposed ACOP does not account for when there may be a scrivener's error or other defect in the mailing that caused the individual to miss the CHA's waitlist communication.</p>	<p>The only ACOP updates regarding Mitigation Hearings refers to waitlist update periods. Other language added was for clarification purposes that applicants who fail to update their information during waitlist update periods are removed from the waiting list and are not entitled to a mitigation hearing. CHA will consider failure to respond to updates based on reasonable accommodation requests.</p>
65	Samantha Tuttle <STuttle@heartlandalliance.org>	<p>Arrest Records (Section II) The CHA proposes the following rule in the ACOP for use of arrest records: "Arrest records alone shall not be the sole reason for denying admission to housing. An arrest does not constitute evidence of criminal activity to warrant denial of admission. An arrest, however, may prompt inquiry into the conduct of an individual that upon further review and with sufficient evidence may determine an individual's lack of suitability for tenancy."</p>	<p>Thank you for your comment. Arrest records alone will not be the sole reason for denying an applicant's admission into public housing.</p>
66	Samantha Tuttle <STuttle@heartlandalliance.org>	<p>On page 17, the proposed ACOP continues: "In addition to the federally-required [sic] rejections for criminal activity, the CHA will deny applicants if the CHA can document via police arrest and/or conviction documentation that: *** An applicant or household member has a criminal history in the past three years that involves crimes of violence to persons or property as documented by police arrest and/or conviction documentation."</p>	<p>Thank you for your comment. Arrest records alone will not be the sole reason for denying an applicant's admission into public housing.</p>
67	Samantha Tuttle <STuttle@heartlandalliance.org>	<p>These provisions imply that the CHA may consider an arrest as a factor in denying admission. Certainly if the CHA "document[s] criminal activity via police record," it will run afoul of PIH notice 2015-19. As discussed above, an arrest record should not be used in whole or in part to deny admission or terminate housing assistance. Arrest records should only be used as a trigger for the housing authority to seek additional information that can be considered.</p>	<p>Thank you for your comment. Arrest records alone will not be the sole reason for denying an applicant's admission into public housing.</p>

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68	Samantha Tuttle <STuttle@heartlandalliance.org>	We therefore urge CHA to align the ACOP with HUD's PIH notice and clarify that arrest records are not considered in determining whether to admit or deny an applicant for housing. We further urge CHA to delete the phrase "as documented by police arrest" or similar phrases wherever it appears in the ACOP.	Thank you for your comment. Arrest records alone will not be the sole reason for denying an applicant's admission into public housing.

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69	Betsy Benito <betsy.benito@csh.org>	<p>I would like to speak strongly in favor of the proposed changes to the HCV Admin Plan and ACOP found in 17-VI.C. Selection from the Waiting List that seeks to insert families experiencing homelessness as defined by HUD Homelessness Emergency and Rapid Transition to Housing Act.</p> <p>CSH has worked collaboratively with the CHA and other City and community agencies to address homelessness over the past 14 years under the various Plans to End Homelessness. We have documented the significant overlap in households who were registered on one or more CHA waiting list while continuing to experience homelessness. Unfortunately because there was no preference, it continued to be difficult to secure housing for those households. We applaud the shift of the CHA in considering how to make this change to honor the needs of its waiting list members who may have fallen or continued to live in literal homeless conditions.</p>	Thank you for your comment.
70	Betsy Benito <betsy.benito@csh.org>	<p>CSH offers a few recommendations for consideration in implementing such a preference:</p> <p>1) Add on to the definition of homelessness to allow verification and direct referral for CHA resources of people experiencing homelessness to come from the Chicago Homeless Management Information System and the Coordinated Access and Referral System.</p> <p>a. An example of where this is being done is San Diego, where the Housing Authority allows direct referrals for homeless households eligible for their resources to go through the local coordinated access system for homelessness</p> <p>b. CHA is already pursuing a data sharing agreement with All Chicago as the HMIS administrator, and sought consent from waiting list applicants during the last enrollment period to match information with HMIS to facilitate housing referrals</p>	Thank you for your comment. CHA has included language in the homeless preference to cover those that meet the definition of homeless under the HEARTH Act and are referred by the City of Chicago or by Chicago's Continuum of Care.
71	Betsy Benito <betsy.benito@csh.org>	<p>2) Clarification as to which parts of the definition of homelessness under HEARTH the CHA seeks to adopt. Parts 1 and 4 relate to households experiencing literal homelessness and fleeing domestic violence, respectively. Parts 2 and 3 relate to families and youth that may face chronic housing instability but are considered homeless under other federal statutes. Clarifying how liberally, or not, the CHA is applying the HEARTH definition will be helpful for local partners and planning.</p>	Thank you for your comment.
72	Jackie Paige 312.399.1716	<p>I would like to say that most of these changes I believe to be positive and beneficial, but I do have something to say as far as CHA using a little bit more of its latitude that it has through MTW to push what the HCV community would like. Like one of the things that we have been asking for is the two heartbeats. That has not been addressed yet, and I believe it should be addressed. Now, I understand that it's been said that we don't have enough participation. The room is empty but with our community unfortunately we have to go out and we have to go and engage them.</p>	Thank you for your comment.
73	Jackie Paige 312.399.1716	<p>When I was trying to get the two heartbeats initiative started I got signatures. I have signatures. So there is, if you would like, I could supply you with the signatures of the HCV residents who are interested in two heartbeats being reversed. I don't understand why they didn't come, but they did sign a petition. There's a petition out for two heartbeats that has signatures. It has a lot more signatures than showed up. So I just want you to know that there is interest in that.</p>	Thank you for your comment.

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74	Jackie Paige 312.399.1716	Another thing, we have asked that CHA – well I won't – I'll keep to what we are talking about. That would take too much time. I'm going to get to what this is right here. I'll say I want to see CHA use its MTW latitude towards the residents more so than just being reactive towards what HUD regs are. Being locked up, I believe that ordinance that you have is good, but I felt like you should go a little bit further and going to the fact of – maybe I did not understand this. Say if a resident just gets arrested. So does this ordinance say if a resident gets arrested, they are no longer automatically given an intent to terminate? I believe that is a positive thing and thank you for that.	Thank you for your comment.
75	Jackie Paige 312.399.1716	Another thing I would like to talk about is the preference, saying if a person lives in the Gautreaux area, they have to already live in the Gautreaux area in order to apply for the apartments the wait list. Well, the whole premise for the Gautreaux lawsuit was to create opportunities for people from low income. Usually the Gautreaux areas are people of income and means, so then the Gautreaux class would not be in the area. So then, how would you penetrate the Gautreaux class by saying that they have to already be in the area? That just seems contradictory to me. And I believe that BPI should get a lot of pushback for that. I believe BPI should get a lot of pushback for not allowing its class to be in on their planning sessions.	Thank you for your comment. The proposed update related to the Scattered Sites waitlist includes clarification language only; there are no new changes to the Gautreaux and Scattered Sites policies within the ACOP. 1) The Gautreaux court order impacts all 77 community areas within the city of Chicago. Each community area has a Scattered Sites waiting list, which requires applicants live in said community area at time of waitlist opening, at the time of screening, and unit offer.
76	Jackie Paige 312.399.1716	And I don't know if he has changed, but I sat personally in on a meeting where Alex Polikoff – I hear he's retired – but he spoke for the organization. He said he did not need to meet with the class, and I think that's why a lot of these things are coming about because it's coming from the top and staying there. It's not – he's getting no input from his class.	Thank you for your comment.
77	Jackie Paige 312.399.1716	The tax credit thing I believe is good because I stay in a tax credit unit, and I can say that I have had inspections anywhere from three to four times in one year. I believe that is a positive change. Like I said, most of the changes that you have brought have been positive. I just think that you should use your MTW latitude more for the residents for what we want to happen. Thank you.	Thank you for your comment.
78	Patrick Barbaruse, 773.374.1961	I'm going to add two comments to Ms. Page made. In regard to the arrest, the language is a bit vague because it is just simply an arrest. If someone is exercising their First Amendment right, that's not cause to lose that opportunity. So it should be more based on the conviction. It should be based more on what type of conviction, is it a misdemeanor, is it a felony, was it just simply a bench warrant? Then also, it could be a mistaken arrest. So that for me needs a bit of clarification	MS. LUDWIG: The clarification is that no...an arrest will never be the sole basis for which we are making a decision
79	Patrick Barbaruse, 773.374.1962	But it is one of the basis.	MS. LUDWIG: It will be – if you have an arrest and a conviction, we would be looking at the conviction, right? So I mean, we would not say an arrest would be the only – if all you have is an arrest, we would not be taking any immediate action.

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80	Patrick Barbaruse, 773.374.1963	So if they could just clarify that to say an arrest and conviction, not simply arrest. Then to follow up, the one regarding participation, one young lady asked me how did I find out about the meeting. I told her I found out through the participant council. Her concern was that she's doing a lot of email blasts. She's doing a lot of trying to get information out there but it is not getting out there. So that might be – I could be one of the reasons. It could also be a lack of interest, but that should be investigated as to why she feels that people are not getting the information.	Thank you for your comment.
81	Patrick Barbaruse, 773.374.1963	So the RAD properties, those 11,000 units, when those properties are transitioned over, will that create a redundancy that these now 11,000 units will take the place of other units that CHA is supposed to be opening up for development or for -- how will RAD fall in place, will be my question.	RAD units are funded through Section 8, whereas Public Housing units are funded through Section 9. The RAD program does not provide replacement units for Public Housing.
82	Patrick Barbaruse, 773.374.1963	If you're now moving – you're shifting 11,000 units from one category. Is it going to free funds to do things that you were supposed to do? Or does it – what – how will they explain what happens to the funding that is now shifting?	RAD units are funded through Section 8, whereas Public Housing units are funded through Section 9. The RAD program does not provide replacement units for Public Housing.
83	Patrick Barbaruse, 773.374.1963	All right. Then the wait list preference, so one comment was, in the example they gave the witness protection. In witness protection you have got families that are over income to begin with.	All applicants, regardless of wait list preference need to meet the income requirements to be admitted into the HCV program.
84	Patrick Barbaruse, 773.374.1963	So there are criteria to allow? Then so with natural disasters –The income is fine. So with the natural disasters, that's from anywhere throughout the United States? Only? So within Cook County?	MS. LUDWIG: They all have to be income eligible. It's not like if you're rich and in the witness protection program, you don't get a voucher. All of that, all the income still applies. In the Metropolitan Chicago area. Yes. It might be a little bit broader than Cook County, but this general – it might – I can't remember off the top of my head how we define that, but we can get you that answer for sure. It might be a little bit broader than Cook County. It's definitely this area.
85	Patrick Barbaruse, 773.374.1963	Then the vagueness – so natural disasters could be –	MS. LUDWIG: It's federally declared. It's a federally declared natural disaster.
86	Patrick Barbaruse, 773.374.1963	Not simply an act of God but it could be a gas pipeline that blows up. So does that also begin to affect the demographic of who CHA will be serving?	This is not a new preference but was put in place after Hurricane Katrina when HUD required housing authorities to house families affected by the storm and future federally-declared natural disasters. CHA has not yet used this preference in the issuance of vouchers.
87	Patrick Barbaruse, 773.374.1963	Would they be able to illustrate where they have used it in the past?	This is not a new preference but was put in place after Hurricane Katrina when HUD required housing authorities to house families affected by the storm and future federally-declared natural disasters. CHA has not yet used this preference in the issuance of vouchers.

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88	Patrick Barbaruse, 773.374.1963	Then lastly for the earned income, what was the rationale, and then where are the findings that allowed them to take it from 48 months to 24 months? What were they seeing they felt that had to happen? Then when they do bring it down to the 24 months and those individuals are removed, who is doing the follow ups to see what the outcomes of those individuals are?	This was a HUD mandated change that they felt would maintain the balance between incentivizing employment among residents while reducing administrative burden.
89	Patrick Barbaruse, 773.374.1963	I apologize, with ACOP, will that – individuals being on multiple wait lists. So if you have site wait lists now, so you're going to have one person – they can put their name on multiple wait lists is what I'm assuming.	Applicants will only be allowed to remain on one Public Housing Family Site-Based Waitlist at a time.
90	Michelle Gilbert, LAF, mgilbert@lafchicago.org	I'm an attorney with the Legal Assistance Foundation, and I primarily represent voucher holders and other tenants with subsidized housing. For the last year, I have spent most of my professional life working with voucher holders who have been subject to discrimination as voucher holders as well as mostly as being African American women with children. The evidence is clear that landlords discriminate against voucher holders in Chicago. Last year WBEZ did a study in one month they found 200 Chicago area Craig's List ads that specifically said no Section 8 despite it having been illegal in the city of Chicago for 25 years.	Thank you for your comment. CHA permits voucher extensions for applicants and residents who have alleged that they have been a victim of discrimination. This is reflected on all voucher extension forms.
91	Michelle Gilbert, LAF, mgilbert@lafchicago.org	And I can personally attest as well with tenants who send me ads that they found that say no Section 8 in addition to the landlords who say verbally, if not in the ad. We applaud CHA for the efforts it has taken to attract landlords specifically addressing changes with inspections, and we do not expect CHA to solve this problem alone. The Chicago Commission On Human Relations wants to work on these cases and enforce its laws and legal aid organizations want to assist participants. But every voucher holder, literally every voucher holder I have spoken to prioritizes finding a willing landlord to take their subsidy over addressing the sometimes dozens of landlords who have told them that they will not accept Section 8.	Thank you for your comment. CHA permits voucher extensions for applicants and residents who have alleged that they have been a victim of discrimination. This is reflected on all voucher extension forms.
92	Michelle Gilbert, LAF, mgilbert@lafchicago.org	With limited search times, participants will take any property, which undercuts the social and economic mobility purposes of the voucher program. We urge CHA to address the problems that it can, to extend search times, to grant extensions liberally to tenants who have been victims of discrimination and other proposals that are included in the longer remarks, the written comments.	Thank you for your comment. CHA permits voucher extensions for applicants and residents who have alleged that they have been a victim of discrimination. This is reflected on all voucher extension forms.
93	Michelle Gilbert, LAF, mgilbert@lafchicago.org	We thought that CHA had said they would take some of these steps in meetings it has held with fair housing advocates over the last year. We are disappointed that CHA has not – has not made any of these changes in the proposed Administrative Plan. Thank you for listening to our comments.	Thank you for your comment. CHA permits voucher extensions for applicants and residents who have alleged that they have been a victim of discrimination. This is reflected on all voucher extension forms.

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94	Tamiko Holt	Katie, we talked numerous times about the process of impact analysis that CHA does. I'm concerned about that process. I want to talk about the income – the assets. Even though the declaration of assets, PHAs may not rent dwelling units to families with assets that net exceed \$100,000. So I'm curious about who sits down and come up with these? Is this a HUD mandate?	Thank you for your comment. CHA awaits further guidance from HUD regarding its required policy on declaration of assets for the Public Housing program.
95	Tamiko Holt	So is anybody here from public housing? Because although I'm HCV, but these issues will cross over.	Thank you for your comment. CHA awaits further guidance from HUD regarding it's required policy on declaration of assets for the Public Housing program.
96	Tamiko Holt	So yes, who comes up with --	Thank you for your comment. CHA awaits further guidance from HUD regarding it's required policy on declaration of assets for the Public Housing program.
97	Tamiko Holt	So did anybody consider with the push of Section 3 and residents want to move their economic status beyond low income to pretty much making themselves really self sufficient by owning businesses? Did any of that come into play when this language was written? So by me just mentioning that, is anybody going to take that into consideration and rework that?	Thank you for your comment. CHA awaits further guidance from HUD regarding it's required policy on declaration of assets for the Public Housing program.
98	Tamiko Holt	We are owning businesses now, and a lot of us that started these businesses, nobody had legal consultation on how to pretty much structure your business. So many people are pretty much sole proprietors and things of that nature, which takes them into a whole other tax bracket that they should not be in. All of their assets fall on them. As they're pretty much in contract, not to mention contracts be sporadically. So you do not have continuous contracts. So while you're buying equipment all of that is your -- is now your assets and pretty much it goes towards your net worth. Do you see where I'm going with that?	Thank you for your comment. CHA awaits further guidance from HUD regarding it's required policy on declaration of assets for the Public Housing program.
99	Tamiko Holt	Yet we as residents, we should not understand things like that. But yes, we have advocates in the room like myself that understand this, and now you make residents scared, like whew, I'm not at that point yet. Well, I still need subsidized housing but I still want to pretty much grow my business. What do I do? Now they're scared they may lose the roof over their head. Do that make sense?	Thank you for your comment. CHA awaits further guidance from HUD regarding its required policy on declaration of assets for the Public Housing program.

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100	Tamiko Holt	Speaking about the control decree and scattered sites, don't you guys see it as pretty much putting you guys in the cross hairs as stuck in between a hard place and a rock? You're supposed to be trying to move your residents towards these areas where low crime and opportunity areas, but in the control decree and how the wait list, and like Ms. Paige spoke about, that pretty much got you stuck to whereas the people that can only put in for the wait list have to be from that area. That's not fair. How do you expect to move people in – our people? Because I have been to where people were turned around because they were a block or two from these specific areas and these addresses. They were in the zip code, but their addresses pretty much were a block or two away from these target addresses. I think it's something very wrong with that, and that has to be looked at again because it's like – that's an oxymoron. It's really you're saying this – that decree is supposed to be moving people pretty much from these destitute areas but you lock them out at the same time. Like no, something is very wrong with that.	Thank you for your comment. The proposed update related to the Scattered Sites waitlist includes clarification language only; there are no new changes to the Gautreaux and Scattered Sites policies within the ACOP. 1) The Gautreaux court order impacts all 77 community areas within the city of Chicago. Each community area has a Scattered Sites waiting list, which requires applicants live in said community area at time of waitlist opening, at the time of screening, and unit offer.
101	Tamiko Holt	And that is pretty much where I'll cut it off from there. And as far as CHA, I want to address it to you because we are voucher holders. They have pretty much – they do give up plenty of extensions on people finding places. And a lot of places where people want to go, it's because they want to. It's not because they are running out of time because they do give up extensions. We have to be more and our people needed advocates like ourselves, that know what they go through that's pretty much out there looking and pretty much know how to pick out landlords that is not right for them to help them in their apartment searches. That's pretty much all I want to say about that.	Thank you for your comment.
102	caroline moody <moodyc_98@yahoo.com>	The proposed changes in the ACOP state, "A guest may visit a family in an assisted unit for a total of 30 calendar days in a calendar year, however, each visit cannot exceed 14 consecutive calendar days. Residents may request a time extension to this visitors time frame". Shouldn't this state a guest may spend an OVERNIGHT visit rather than a VISIT? Guest may want to visit more than a total 30 days. Certainly the amount of visits would not be restricted. Could any time frame be stated as to the time of day the guest must leave?	Thank you for your comment. CHA has no proposed updates to its current guest policy.
103	Myra King, 202 W 95th St	I waited 20 minutes to come up; I arrived at 11:10. I came up about 11:40. The SS document change states that residents will have about 90 days to add new members to the household. In some cases this may not be enough time due to th fact etc, that we can no longer receive print outs which may elongate the process pass the 90 days.	Thank you for your comment. We made every effort to promptly escort people to the hearing and apologize for any delay.
104	Carolyn Moody, 855 W Aldine, moodyc_98@yahoo.com	Limited vouchers for RAD. Moving out on voucher. CHA still accepts 30% of income.	Residents of RAD properties may be eligible for a Housing Choice Voucher (Section 8 voucher) after one year of occupancy and have the opportunity to port (move) the voucher to a different city. The RAD Program only allows residents to pay income-based rent. Residents pay the greater of 30% of adjusted monthly income or 10% of gross monthly income.

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105	Raemant Wooden, 740 E 43rd St, 312.273.2969	HCV voucher after 1 year in RAD building.	Residents of RAD properties may be eligible for a Housing Choice Voucher (Section 8 voucher) after one year of occupancy and have the opportunity to port (move) the voucher to a different city. The RAD Program only allows residents to pay income-based rent. Residents pay the greater of 30% of adjusted monthly income or 10% of gross monthly income.
106	Minnie Jefferson, 4227 S Oakenwald, #130	Will this information be presented to all sites once it has been approved?	Residents of RAD properties may be eligible for a Housing Choice Voucher (Section 8 voucher) after one year of occupancy and have the opportunity to port (move) the voucher to a different city. The RAD Program only allows residents to pay income-based rent. Residents pay the greater of 30% of adjusted monthly income or 10% of gross monthly income.
107	Mr. Wooten	My understanding, after a year you can change into Section 8? It's not guaranteed?	Residents of RAD properties may be eligible for a Housing Choice Voucher (Section 8 voucher) after one year of occupancy and have the opportunity to port (move) the voucher to a different city.
108	Mr. Wooten	Would it be like, you could move anywhere, like --What if I want to move out the city?	Residents of RAD properties may be eligible for a Housing Choice Voucher (Section 8 voucher) after one year of occupancy and have the opportunity to port (move) the voucher to a different city.
109	Ms. Thomas	Yes. The papers were passed out earlier this year, last year, and I didn't fully understand what I read. It sounded like if you're paying low -- no income based on-low rent based on your income, you would have to move to a certain location because everybody that's paying low rent will have to move to a certain location. I don't know if I got that right or what. That's why I'm here to find out. Is that something that was --	MS. COLINET: Are you speaking of the public housing program or voucher?
110	Ms. Thomas	CHA, senior building.	MS. COLINET: Senior building. You're saying that you're being asked --
111	Ms. Thomas	No, nobody asked me to. They sent out the papers last year or early part of this year, and maybe I misunderstood. You know what I was saying? That's why I came down to verify whatever. If your income is low, I mean if your rent is low based on your income. I mean, everything is fine. You wouldn't be asked to move.	MS. COLINET: I'll have to see the letter you're referring to. I'm not sure if your --
112	Ms. Thomas	That's gone. I don't have -- like I said, I might have read it wrong.	MS. COLINET: Well I mean, we can take your name and then if you have -- if you have a letter, we can ask further questions. I can make sure to follow back up with you.
113	Ms. Thomas	That's what I was concerned about.	MS. HOYLE: So I do have your name and your contact information from the card that you fill out. So we will have someone follow up to try to answer your question.

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114	Ms. Jefferson	Basically, we have a lot of interesting information here, and a lot of it has been disseminated before, but we have very minimal representation from places. Will people -- will there be someone coming out and making this clear, as clear as possible to the -- to the different residents of the different sites? Yes, I live in the senior building but even in housing, in the family housing, will someone be saying okay, this is how. And even ACOP, you know, ACOP, how does it refer to the lease, what have you. A lot of people are not aware and we don't always understand. Will someone be coming out to the various sites?	MS. HOYLE: I mean, that is not something we have considered, but we can certainly do that if people at specific locations have questions about it.
115	Ms. Jefferson	A lot of times it has been my experience that people have not felt that comfortable with coming and presenting. So at their own site in their -- I think it's very important that someone does come out and speak. Years ago I lived in family housing. So just knowing what's going on, how it's going on, and for someone to come and make it clear, or make it -- present it, we cannot always say it will be clear.	MS. COLINET: So information notices were submitted, were distributed to all residents and that's where -- why you're here. You received the notice.
116	Ms. Jefferson	The way it's -- excuse me for interrupting, but the way it was, it was a notice posted. It wasn't nothing individually to each apartment and we have 120 units.	MS. COLINET: Notices were posted.
117	Ms. Jefferson	It was posted, but if you don't come downstairs, look at the bulletin board, or what have you. So disseminating information is --	MS. HOYLE: I don't mean to interrupt both of you, but I think if I can -- I was understanding what she said a little bit differently. This hearing is just about the changes we are proposing now. But you're saying people may also be interested in just getting an overview of the document in general, not just these changes.
118	Ms. Jefferson	Yes	Ms. Hoyle: That is a suggestion. I understand what you're saying and the reason for it, I can certainly discuss with people here. MS. COLINET: So you know, we did attend the most recent LAC meeting, CAC meeting. We did have team members at that meeting to actually provide an overview as well. We can definitely look into giving more information out in the future.
119	Ms. Moody	Carolyn Moody, and for the RAD vouchers that you could use, you know, to move out of the CHA, those are limited, correct? They're only given to so many per year?	After completing a one-year residency requirement under the RAD program, households within RAD PBV units may request a tenant-based Housing Choice Voucher. CHA will provide tenant-based vouchers to the households that have requested them to the extent that they are available. Depending on the volume of households requesting a voucher, CHA reserves the right to provide no more than three-quarters of its turnover vouchers per year to eligible Choice-Mobility households.
120	Ms. Moody	When Minnie mentioned people going out to the buildings, now I believe our building is RAD. Here is what happened. They came to our building a year ago in April, to designate this would be RAD. Now in the handouts that we did receive, they were supposed to let us know within a year, come back. But no one ever came back to tell us how it went through. But my lease is not up yet. People after me, in May their lease started. I'm in April. I'm like at the end of the year. For May, so those people did get three-year leases. So I'm assuming that our building is RAD because in the RAD, they told us we would get two or approximately three-year leases, so --	All residents of RAD properties are required to sign a new lease. If you have not done so to date, then your building has not converted to RAD.
121	Ms. Moody	Well here is what happened. They started in May to get the three year leases, but my lease is up in April. So it goes May to December back to January. Hattie Callner Building, on 855 West Aldine.	Ms. Colinet: If you want to confirm that with the property manager. I don't have the list that can identify all, but all residents that are in buildings that have converted, all those residents, regardless of the time that you signed your initial lease, all of them will have to sign a new lease when that converts to RAD.

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122	Ms. Moody	Really? Why do you think the people, some of them did get three year leases already when some of them did not?	Families where all members are elderly and/or disabled (on fixed income) must complete their recertification process and sign a new lease once every three years.
123	Ms. Moody	What does that mean?	Families where all members are elderly and/or disabled (on fixed income) must complete their recertification process and sign a new lease once every three years.
124	Ms. Moody	At the same time?	Families where all members are elderly and/or disabled (on fixed income) must complete their recertification process and sign a new lease once every three years.
125	Ms. Moody	That's what I understood when they came out to tell us it would be effective for everybody when they approved it. Just I did not understand why the people would have three-year leases right now. Why would that be?	Families where all members are elderly and/or disabled (on fixed income) must complete their recertification process and sign a new lease once every three years.
126	Ms. Moody	What does that mean triennial? I didn't know anybody in our building ever had that.	MS. HOYLE: That you get certified every three years instead of every year.
127	Ms. Hardison	I understand what RAD is to a point, but why are you giving out Section 8 vouchers where would we want to pay more rent someplace else, and then we are living in a decent amount – paying a decent amount of rent now? Why the Section 8 voucher being given out? We are supposed to be low income. Section 8 voucher, we go out here the rent could be \$8, \$900 a month.	For all residents in buildings that have converted to RAD, there is no requirement that you must take the voucher. It's optional. Residents pay the greater of 30% of adjusted monthly income or 10% of gross monthly income. There is no requirement to take the voucher. Residents are more than welcome to continue residency at their RAD building.
128	Ms. Hardison	So like I said, we have heard different things, so the understanding we have now, will it change or will we have to – will our rent go up because where we live is like prime property. So the rent goes up more.	MS. COLINET: So if you're in a property that is converting to RAD, you should not see any impact whatsoever. Again, the only benefit, if someone considers it a benefit, is the opportunity or option to move out to, to take your voucher to the private market if you choose to. That's the only benefit. Some people desire to. If that's your interest, you have that opportunity, but by no means is it a requirement that you must take the voucher. If it's available to you
129	Ms. Hardison	So our 30 percent will be paid by HUD or CHA doing it? Which one is it? Because a young lady told me that CHA did not have the money. I'm trying to get input of exactly what is happening.	MS. COLINET: So again, if you're a resident of the building, there is no change or impact to you directly if the building converts to RAD, and you're paying whatever your rent is. That's your rent. Your rent is not increased as a result of the building converting to RAD.
130	Ms. Hardison	So when I sign my lease again, I just signed my lease. When I sign it again, I will be underneath RAD, and my rent will go up each year? Or do I just – do I have a three-years lease or a two-year or one year? Will it vary, fluctuate? How will it go?	MS. COLINET: Again, everything remains the same. If you're on annual re certification then you will continue your annual re certification, sign your lease every year.
131	Ms. Hardison	As RAD? WCDC.	MS. COLINET: Correct. There should be no residents in buildings – there should be no change to what you see. The management company is the same. There should be no change to you if – who's your management company right now? So you shouldn't see any. There is a benefit for taking the voucher. It's not a requirement.

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132	Ms. Hardison	Why are you offering it? I'm not -- that is -- I don't understand if the -- if you're happy there, why would you offer them something else where they're going to pay more rent?	MS. COLINET: Some people may desire to move out of the property and take their voucher someplace else.
133	Ms Moody	We have been -- we are afraid. We don't know what's happening, and no one has been explaining this to us. And a lot of people do not comprehend like me, so thank you.	MS. COLINET: Some people may desire to move out of the property and take their voucher someplace else.
134	Ms. Hardison	Can I make another comment? We are told when RAD came in, and if you want to take a voucher to somewhere else, you would still be -- whoever accepts, you would still have to agree to the rent of 30 percent of your income.	Correct.
135	Ms. Hardison	But we know, we read in the press, the guy that was living down on the Gold Coast, and CHA was paying \$24,000 a month for his rent. Now that was okay. You know they, CHA approved it, but I don't think you could go somewhere and pay that high rent. I don't think CHA will approve that. So 30 percent of your income, they have to accept that.	MR. REHRIG: Right. So I think what you're speaking to is the exception payment standard and CHA still does have the exception payment standard. We have a payment standard, which in 2017 and do not quote me on this, a little more than a thousand dollars a month for a one bedroom. And so if a resident chooses to live in an opportunity area, we will pay up to 150 percent of that, so approximately \$1500 a month for one bedroom.
136	Ms. Jefferson	You see how this, even small information is disseminated on paper? This whole block of paper and we made the statement before we started up that going through, and I do ask where is it in this document different issues have come up, you know, because we read it through, interpret, what have you. And it's really very very disconcerting and sometimes frightening. Thank you.	Thank you for your comment.
137	Julie Brown <jbrown@bpichicago.org >	In the updated ACOP offered for public comment, CHA proposes to transition its traditional family developments to a system of site-based waiting lists (p. 23). The proposal to replace the Community-Wide waitlist (which currently governs all non-elderly public housing units in Chicago that are not voucher-based) with site-based waitlists is a major overhaul of the current waitlist process, and raises a number of Gautreaux concerns.	Thank you for your comment.
138	Julie Brown <jbrown@bpichicago.org >	Transitioning to site-based waitlists for non-elderly units would of course require approval of the Gautreaux court. One of the principal remedies of the Gautreaux v. Chicago Housing Authority case was the court-ordered Tenant Assignment Plan, upon which the current Community-Wide waitlist is modeled. This Plan prescribes a city-wide system of tenant selection and assignment. The Tenant Assignment Plan (as well as this proposed ACOP, on p. 25) also provides that 25 percent of applicants to scattered site properties be drawn from such a city-wide waitlist. CHA's proposed site-based waitlist system differs in several respects from this Gautreaux-ordered Tenant Assignment Plan.	Thank you for your comment.

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139	Julie Brown <jbrown@bpichicago.org >	<p>While BPI supports CHA's intention to create a more efficient waitlist system that would enable applicants to move more quickly to their preferred locations, we are concerned with several problematic aspects of the site-based waitlist system proposed in the ACOP:</p> <p>1) First-Available Option: Although the updated ACOP states that applicants will be able to either select a site-based waitlist "or opt for the first available unit offer across the entire family housing portfolio" (p. 23), CHA's 2017 Annual Plan states, "[c]urrently, CHA does not intend to maintain a First-Available Waitlist along with its proposed Site-Based Waitlists." Rather, according to the 2017 Plan, CHA will evaluate waitlist activity and "will open a First-Available Waitlist if deemed necessary." The lack of a "first-available" waitlist option is likely to harm families with an urgent need for housing. In our view, a first-available option should be preserved for applicants prioritizing urgency of placement over location.</p>	Thank you for your comment.
140	Julie Brown <jbrown@bpichicago.org >	<p>2) Multiple Site Preferences: As described, the proposed site-based waitlist system would require applicants to select only "one site-based family property waitlist." We believe applicants should be able to specify more than one site from which to choose (perhaps a prioritized list of three to five preferences). Such an approach would have multiple benefits. In addition to enabling applicants to diversify their housing options, it would also facilitate quicker placement in housing and be more efficient to administer.</p>	Thank you for your comment.
141	Julie Brown <jbrown@bpichicago.org >	<p>3) Oversight and Monitoring Systems: For its site-based waitlists, CHA states that marketing, application intake, applicant interviews, screening for suitability, eligibility determination, housing offers, and unit assignments will be completed by property managers. This represents a dramatic departure from the current Community-Wide waitlist practice, where application intake is handled by CHA. If such a shift in waitlist control is undertaken, CHA should implement an effective oversight and monitoring protocol to prevent potential mismanagement by private property managers.</p>	Thank you for your comment.
142	Julie Brown <jbrown@bpichicago.org >	<p>4) Conflicts with Other CHA Waitlists: Replacing the Community-Wide waitlist with site-based waitlists appears to conflict with other CHA waitlist obligations. In addition to tenanting 25% of Scattered Site units from the city-wide waitlist, CHA also selects 50 percent of applicants to PRA properties from the "city wide public housing waiting list" (CHA 2017 Housing Choice Voucher Administrative Plan). Such inconsistencies need to be addressed.</p> <p>BPI welcomes the opportunity to discuss these concerns with appropriate CHA personnel in an effort to identify a mutually agreeable path forward that results in a more efficient and effective waitlist system for CHA and residents alike.</p>	Thank you for your comment.
143	MS. SAMPSON	<p>I was wondering about the criminal aspect of the new proposal. My question was – my question was about the criminal aspect of the proposal. My question was, basically that you guys go back three years for criminal activity, and my comment was like most of the time like when you hire criminals, when you get somebody for three years, so the community and the way they are now, and then people can go to jail and come out and no one is actually monitoring those people, and they make the neighborhood a little bit worse.</p>	<p>MR. REHRIG: Thank you. So yes, the HCV program, like public housing has proposed to revise the criminal activity period from the current five years to three years. So we will be looking back to see whether the participant, the applicant, or the family member has engaged in criminal activity in the last three years instead of the last five years. So thank you for your comment. That will be taken into consideration.</p>

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144	MS. EL	I don't believe this fits under anything, but I was reading the reorganization of the wait list, and I'm not sure if this person is on the wait list, but I have a situation where the daughter is kicking the mother, who's a senior disabled person who cannot live alone, kicking her out of her apartment. And this woman needs an apartment fast because she's supposed to be gone by tomorrow, from what I understand. Is there any way we can help her?	MS. HOYLE: I think we may have to have an off-line conversation about that. So if -- are you staying until the hearing is over? We will talk to you after about that.
145	MS. EDMONDSON	Yes, a complaint is I'm having a problem with my management office, and so on. I have been having a problem with someone has been entering my property with keys. And my door -- my lock has been changed by the old management to the new management. And none of my keys -- so therefore the management, they do have keys to my apartment. Somebody has been entering my apartment with the keys, so on. When I have been having the locks changed, they come in and they have changed the locks several different times, and now the screws have got to the place where they're stripped, where it's constantly turning and everything. I have to put glue in it and stuff like that. But then still somebody still coming in and taking my personal items and paper documentation, and so on.	Please provide CHA with the name and address of your property and this matter will be investigated.
146	MS. EDMONDSON	But the thing is that I have put in an order so many times, but the lady in the office said that my door was put in maybe the fifth and I just spoke with her as I was coming in. And she is telling me oh, your door is still on order. Now I'm in town to go to my relatives to get some rest because I'm under so much stress, I go to my family but there is no way I can leave my door. So I have personally -- I have put chains on my door, my own lock, the master lock, and they have drilled holes in it. Other ones they have, I'm using the key to unlock it and it's falling apart.	Please provide CHA with the name and address of your property and this matter will be investigated.
147	MS. WASHINGTON	Good evening. My name is Francine Washington. I have several questions. I hope I'm not talking to fast for the court reporter. First of all, in the periodic update the wait list is there, update the wait list, is it place to complain because every time someone calls to see where they are on wait list, they are told they're in the top 25. I never understood that. What is top 25? There are numbers. Can you give them numbers or something? Everybody has been told call tomorrow. One of yawl just make the call. They'll tell you you're in the top 25. I don't understand what that is.	CHA does not provide applicants with their exact waitlist placement numbers, but instead provides their general position on the waitlist by percent (i.e. top 25% of waitlist, bottom 25% of waitlist).
148	MS. WASHINGTON	All of them. And site -- we have been having site based lists for the last every day. I know the last 10 years we have site based wait lists in different locations, and folks have applied like 87th and Houston, 6029 Harper, 71st and Merrill. We have had them at 3939. We have had them at the Hispanic housing. We have had people apply for wait lists, yet for site based for the area, yet they was merged to the regular wait list. When can you pull them out? When do you separate them? If I apply for an area, I should have first preference on the area I applied for instead of you telling me you put in for everybody else. So it goes -- will someone go in and separate those folks?	Per the Gautreaux order, 50% of scattered site units must be offered to applicants from the community area in which the unit is located.
149	MS. WASHINGTON	Also, over income households, that means that CHA to let you -- they will choose whether to let you go or let you stay or charge you market rate, right?	MS. COLINET: So essentially, we are waiting for further HUD guidance to put the policy in place but that's correct, yes.
150	MS. WASHINGTON	Because I was wondering how you move out yet and still your girlfriend down the way over income, and you let her stay. So really it needs to work for everyone. You have to come up with a way so it works for everyone or it will be some friction. Also, Earned Income Disallowance, when will that take effect, next year?	MS. COLINET: It's currently in place right now.

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151	MS. WASHINGTON	I say this every time, our managers is being told that the residents have a job that worked there a couple years, they automatically get Earned Income Disregard. Too many times people work and they call our office and they say I work and my rent is supposed to be this. I say have you been working in the last couple years? Why aren't you getting Earned Income? I thought that managers are supposed to automatically offer it now. I thought it was a HUD mandate. So can it be any way to be given to the managers because it's not happening.	Property Managers should recommend EID any time an applicant is eligible
152	MS. WASHINGTON	And income termination, we will deal with the child support, this is iffy. You said in other similar payment types and you also said other periodic payment types. Do that include child support? Because it has been a big issue.	MS. COLINET: This is specifically for those who are fixed income. We are doing straight income -- doing straight income determination. Essentially those who are on fixed income will use the COLA to make that adjustment from that previous year's income. That's what that is referencing.
153	MS. WASHINGTON	My last -- we are doing it every two or three years depending. Fixed income, you are only doing it every two or three years.	MS. COLINET: Whenever your re certification period is, we will do that. We will take that last, your income from that last period, take the COLA -- the -- I'm sorry, I'm talking about -- using the acronym, Cost Of Living Adjustment. That's going to be used to determine what that -- that cost of living percentage will be used to determine that adjustment period adjusted rate for that income the following year.
154	MS. WASHINGTON	It should have said just for the fixed income. You can only do it on fixed income.	MS. COLINET: Correct.
155	MS. WASHINGTON	It should have it stated somewhere. I didn't see fixed income nowhere.	MS. COLINET: If you look at that first sentence for household, it will be conducted for any member of a household with fixed income...
156	MS. WASHINGTON	Oh, Social Security. She just showed it to me, okay. Also, you're talking about the Safe Harbor. When will that be enforced? People have been fighting for Safe Harbor for the last nine years. When will it be enforced?	MS. COLINET: So what this is proposing at this point is we are changing -- proposing to update the time period. So currently the Safe Harbor time period is 90 days and the proposal is to update it so that it will be 180 days.
157	MS. WASHINGTON	I give you ten folks right now, I guarantee you, they will be on Safe Harbor for nine years. Am I right, Debbie? So are we going to enforce that?	MS. COLINET: We're proposing to change the language, to change that time period to 180 days.

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158	MS. WASHINGTON	Saying it will be enforced. you don't enforce this, you cannot enforce both 55 to 61 or 180 hours. I think it's more people under 55 that's taking place. They aren't working, in school, volunteering, doing something, and they are just sitting around. They need to do something because right now, that's the way to put them on the eviction list. You tell them Family Works is not mandatory but you tell them at the eleventh hour they get a referral saying they're not doing this, they are not doing that. Then it's mandatory. So we have to also change the language. The language also goes with this. Do it make sense?	Language is being updated to make clear that individuals aged 55 to 61 are not exempt from community service or economic self sufficiency requirement
159	MS. WASHINGTON	We have to combine those two language together. We have to make sure, we really need to follow up on this.	MS. COLINET: We will take a look at it.
160	MS. WASHINGTON	Also, Section 8, one question about Section 8, I really did not understand the term inspection – inspection method for HUS. I really, I don't understand what you're saying. One – what inspection – one inspection counts out the other, one inspection is more thorough and some inspections are required. How can I do one and it cancels out these?	MR. REHRIG: Right, so these are very rare circumstances that HUD has put forth rules that said if the unit is assisted through the HOME, which is an acronym, or LIHTC, which is an acronym, through those programs and if we conduct inspections on those units through those programs, we can use it as an HCV, HUS inspection. That's all it saying.
161	MS. WASHINGTON	Well what do those acronyms mean? Can somebody help him out?	MR. REHRIG: So LIHTC means Low Income Housing Tax Credit Unit. I don't know what the whole acronym means. We will get back to you on that. But it's very rare circumstances that this will be employed. That's what has been put forth right now.
162	MS. WASHINGTON	Can I get a response tomorrow because I think I know, but I can't remember off hand because I just read – I need for you to know. So I don't understand. I did not understand when you told it to me. And criminal activity three years, okay, reasonable accommodation language, so you give the benefit of the doubt because a lot of them are just being rejected, rejected, rejected. So are you saying now you will look at it instead of automatically rejecting?	MR. REHRIG: We are saying if they're incomplete, we will protect them. We will say they are incomplete, and we will tell them to send – what additional info we need, what additional documents we need instead of saying rejecting them outright.
163	MS. WASHINGTON	I know because I have seen some people where they didn't have the proper address, the zip code was wrong, the address and street number was right but a different street name.	MR. REHRIG: So in the voluntarily compliance agreement we entered into with HUD, it simply states we can no longer deny these based on the fact that they are incomplete. If they are incomplete, they should not be denied. They should simply be stamped or told to participant that it's incomplete and that additional documentation is needed.
164	MS. WASHINGTON	You all will send them the information, am I correct? You will send them information that it's incomplete?	MR. REHRIG: That we what? Yes.

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165	MS. WASHINGTON	Nobody never told them until they inquired about it. You're talk about doing the follow up in the office. So remember this day and who said it, okay?	MR. REHRIG: That's our process that we are putting in the 2017 plan.
166	MS. THOMPSON	On my card I think you have information about your earned income credit – not earned income, Earned Income Disregard and your Safe Harbor. You're mentioning that the Safe Harbor is 180 days as opposed to 90 days. I thought Safe Harbor was supposed to disappear. You're mentioning that the EID that's going to be put in the administrative plan. My question is, why aren't both of them put in the administrative plan? Why is the timing different?	MR. REHRIG: The Earned Income Disregard or the Safe Harbor?
167	MS. THOMPSON	Both. You have different times for both of them.	MR. REHRIG: So the Earned Income Disregard, they are disallowance. The guidance we got from HUD is similar to the HCV program. Previously up until April of this year, the Earned Income Disallowance would apply for 24 months over the course of a 48-month period. However, now HUD has stated that effective April of 2016, it will only be applied for 24 months total. So once it kicks in, it only applies for 24 month. There's no starting or stopping.
168	MS. THOMPSON	Why has the times been different? Why is it 180 days as opposed to 90 days for Safe Harbor and why is there extended time for the EID?	MS. COLINET: So I think Clay answered it.
169	MS. THOMPSON	Why aren't both of them inside the Administrative Plan?	MS. COLINET: So the work requirement is not applicable to the administrative plan. The work requirement is applicable to the ACOP, to the public housing program. And so the idea on the extended time, the time from 90 to 180 days is to ensure that we give people additional opportunities to look for employment options. Sometimes it's very difficult for residents to find employment, so we want to make sure that we give them extra time to make sure that those opportunities for them to research and identify the places to work, they can actually have enough time to do that. So that's why we have extended it. We thought it's important enough to give residents additional time to look for employment.

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170		So to piggyback on what Commissioner Washington was saying about the Safe Harbor, we know folks that have actually been on Safe Harbor for years. Who's monitoring the Safe Harbor, if it's being monitored at all?	MS. COLINET: That is being monitored through our resident services team, through the Family Works team. So those groups work with the residents and monitor their time period on for Safe Harbor, FamilyWorks.
171		Who follows up with them, with the management team or the HUS or family provider team or whoever you have that's monitoring Safe Harbor, who monitors them? Otherwise, we wouldn't be talking about people being on Safe Harbor for nine years.	MS. COLINET: So essentially between the FamilyWorks Department and resident services and property office, that information is monitored for residents who were receiving assistance and were on Safe Harbor. I can't comment on individual circumstances. You can pass that information along to us, but I cannot confirm individuals that have been on nine years or plus. I can't say that is not the case or it is the case.
172	MS. SQUARE	Before I get to my question, I want to go back to something that you talked about, Ms. Colinet and Mr. Clay. I heard you say that the work requirement has not been implemented onto HCV. How can you give an Earned Income Disallowance to HCV residents if they're not required to work? How does that work? And how long have HCV had this program turned over to them because I have known people from HCV for years and EID was not implemented unless it become implemented this year.	MS. COLINET: So I'm sorry, I'll clarify that. What I was trying to say is that for public housing, the requirement for residents upon entry to the work, there is a 20-hour work requirement. That's not the case for HCV. There is not a mandatory work requirement upon coming in for you to meet for HCV.
173	MS. SQUARE	So why do they get the Earned Income Disallowance. I know you have residents who are on HCV that's already working, but you have a bunch of them who are not employed. I guess what I'm trying to get across that because you all are trying to enforce rules on both sides to at some point mimic each other, when will the work requirement be implemented on to HCV?	MR. REHRIG: At this point we have no plans to implement work requirements, but we can certainly take --
174	MS. SQUARE	When do you plan on getting service providers for HCV?	MR. REHRIG: That's not something I can speak to. That is not in the 2017 Admin Plan.
175	MS. SQUARE	All right. So all of that we want you to take back because we want to make sure that our residents are self sufficient. They need support. My first question is, Earned Income Disallowance. I'm so curious to understand it because I got a call today from a resident and her question was what type of income prohibits you from not being able to qualify for Earned Income Disallowance? And do I need to give a scenario of what happened.	MS. COLINET: You can provide a scenario.
176	MS. SQUARE	She had become unemployed for two and a half years. She -- while the reason for her unemployment is due to an accident on the job or whatever, so she was receiving workmen's comp. She began back working. She went into the property management office to do her re certification. She -- they never told her that she could get Earned Income Disallowance. She inquired. They told her because of her income that she was previously receiving she couldn't qualify for it.	MS. COLINET: What we can do is, we can actually take down that person's info, because if there is some nuances, I don't want to speak not having a full picture. We want to make sure that the manager is looking at the file. So if you could provide us with that contact information, and we can make sure that
177	MS. SQUARE	I will. I just want to know C179:D189w is there a specific income, if you have been employed for a certain amount of years and you may have received public assistance or something, that was -- you have to go back to employment, would that prevent you from -- what income would prevent you from not qualifying is my question.	MS. COLINET: We will take a look at that.
178	MS. SQUARE	My last question, the wait list. I do understand that we have residents or applicants that have been on the wait list for a while, and some of them have not updated their information. When you all send letters out, and they don't receive it or because they moved on to another address or whatever the case may be, what is the extension time that they would have before they're removed from the wait list? Is it a year, six months, what?	MS. COLINET: So overall generally speaking, anybody whose on the wait list right now, they have the opportunity to update their information. They are required to update their information. They have to go on the website to do that. So any time a person moves, phone numbers change, it's their responsibility to update their info. They can either contact CHA or go to our website.

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179	MS. SQUARE	Again, I thought that when you go on there, that was only for the traditional updates. Is that the same for HCV and senior? And also, those that do not have access to a computer. HCV, I have talked to one of your directors yesterday and informed them that 312-935-2600 number, if I'm updating my information verbally and I go to that, I try to enter my client number and it prompts you for your Social Security Number, and if none of them do not match because of whatever error it may have been or whatever, it doesn't allow you at any point to speak to a live individual because I'm having problems. And it keeps on repeating the same, mimicking itself. I tried with a resident to update their information, so I know it's irritating to me, I know it's frustrating to them, okay? So at some point can you all figure out how to correct that?	MS. COLINET: Sure, and then I'll just encourage you, there is – if you have – if you're working with residents or applicants that have an interest in updating their information, whether it's HCV or public housing, go on the website.
180	MS. SQUARE	I always send them to the traditional family portfolios person, Ms. Collins, and she's told me to call that number. But she still accepts them, so – I'm just saying for future reference.	Applicants on any Public Housing waiting list are encouraged to utilize the CHA's online update tool, or to call the Occupancy department at 312-935-2600 with updates. This applies to both senior and family applicants
181	MS. BROWDER	Good evening. I'm new to CHA's resident housing. I have been on the wait list for years. I just qualified for the CHA housing. What I don't understand is that when they called me and I registered for them, they finally called me in for a residence. When I get there and I looked at the place outside the premises and the inside, it wasn't suitable for person to live in. The hallway was a mess. I got pictures. I got everything. I went to go fill out my paperwork, and they told me if I don't take this apartment, I would be kicked off the waiting list. And I'm like, if I don't want this apartment, you mean all the years I waited for this, I would be kicked off? She was like yes, you have to take it.	If an applicant is offered a unit in poor condition and the Property Manager says the condition of the unit will not be improved, the applicant should call the Occupancy Department to make contact with an Occupancy Staff Member and the Portfolio Manager of the building. A unit should not be in poor condition when an applicant is moving in and becoming a resident.
182	MS. BROWDER	I said well, don't you all get grants and money to fix these properties? I said no way you should be wanting someone to live here, and yawl got all these maintenance men working and this apartment building, the living condition is poor. It's poor, like no – the wall paper, the graffiti, everything. I know for myself that yawl get federal funding to fund some of these places and upgrade them every 10 to 20 years.	If an applicant is offered a unit in poor condition and the Property Manager says the condition of the unit will not be improved, the applicant should call the Occupancy Department to make contact with an Occupancy Staff Member and the Portfolio Manager of the building. A unit should not be in poor condition when an applicant is moving in and becoming a resident.

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183	MS. BROWDER	Another question. At that particular time that I was filling out my paperwork, I got a call and paperwork from another CHA residence. I wanted to move there. They told me I could not. I said excuse me, I haven't even moved in yet. You don't qualify. You have to take this place. Why do I have to accept something that I know I'm not comfortable with? The maintenance man fraternizes with the community, drinking, smoking, and everything else. Oh, and I got plenty of video. And I'm to a place now like I'm stuck at a place that I have to come in inside the walls, it's not clean. The maintenance man in my building, management maintenance men are living -- are working out of my building and my building looks like a mess. It's unacceptable.	An applicant in screening for a public housing property should not be sent to other public housing properties at the same time for screening. This scenario of two outreaches is likely due to an administrative error.
184	MS. BROWDER	So I was kind of hurt because I have another place, very beautiful that I wanted to go to be close to my mom because she was ill. They told me I could not. I had to take this place. And I was like this is really -- things need to change. CHA, Section 8, low income, whatever, it really needs to change on the way we live and we put these people in these residences. Maintenance men get paid to clean, to keep the property up. They get paid for that. Management, if you -- if you're not painting in 10 or 20 years, where is the funding come? This is supposed to be painting whether we residents. You're supposed to upgrade. You have people walking around. We have people in homes they -- they got to keep painted and keep their property upkeep, updated.	An applicant in screening for a public housing property should not be sent to other public housing properties at the same time for screening. This scenario of two outreaches is likely due to an administrative error.
185		So my thing is that, so my thing of it is as an individual that lives in CHA, how can I get on some board to make this better and work for us? I need to see what's going on and I want to be placed in -- I'm in 600 East 41st Street. I have been complaining constantly. They told me they could not give me no -- I said well, can I get an email address on yawl? We don't have email. The Devil is a lie. You got an email address.	MS. COLINET: You said Carl G. Stewart?
186		600 East 41st Street. That's low income. I'm like this is just too much for me. We never -- I got holes in the -- in the inside of my apartment underneath the rug. How do you put a rug down when I put on my -- I'm gonna sink in? I complained. I complained. No one seems to care. But the thing I get upset about, you are concerned about your money and how you pay your bills. I'm concerned about where I live and paying my bills at well. I don't like the way things are being presented when you don't have an email address, when I can't reach you. But if I don't pay my rent, I get a 30-day notice. I got a 30-day notice if I don't pay my rent. That's unfair. I work for the - I work for the government. I know every section code. The code that we are in is satisfaction.	MS. COLINET: So we have the address of your property, 600 East 41st Street. We will make sure that we look into that.

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187	MS. YAHNEWBIAN	Good evening. If you pay --if you have not signed your RAD lease and you're facing an increase of over \$25, I read somewhere it says, if you -- if you have to pay more than \$25 per month in additional rent, your new rent will be phased in over the next three to five years. Now, if -- how does that impact a three-year lease? Because that would seem to suggest that every year you would pay a different amount until you equal the over \$25 rent increase.	MS. HOYLE: I think we will have to have the RAD person from CHA get back to you because I don't know the answer to that. We will follow up with you. So we will have someone to answer your question. At this point, I don't have any more comment cards from the audience. So if there is -- I'm sorry, Francine?
188	MS. WASHINGTON:	I have one more question. Although the Earned Income Disregard for two years, we did not get facts that some people understand we should had somewhere, although in the Admin Plan, if you get Earned Income Disregard and self sufficiency, one cancels the other one out. That needs to be put in there somewhere so people understand when you make the changes. Under self sufficiency, Earned Income Disregard, you have nothing to contribute to the self sufficiency program. So that needs to be a part of this so people understand it. Because some people self sufficiency ask what that means. You can't get it.	MS. HOYLE: Okay. Are there any more? Could you please state your name?
189	Ms. Hill	My name again is Louise Hill, if I didn't tell you before, and a little while ago you mentioned the resident services coordinators, did you not? You said RSCs, did you not? I think it was something you said you go to them. Do you all know what you're saying? You don't remember? We're seniors. Resident service coordinators. You said RSC, resident service coordinator. That is the so-called social worker that we have at the building and produced by management. Where do they get their training from?	Resident Service Coordinators are trained by property management staff and work in collaboration with CHA's Resident Services Department.

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190	MS. SQUARE	Her question is where do resident training services get their training from?	Resident Service Coordinators are trained by property management staff and work in collaboration with CHA's Resident Services Department.
191	MS. HILL	You told us we had to go to them, but for a fact, I know that some of them do not know the answers to any questions. So where do they come from? What training do they have that they're qualifying to oversee seniors? And they don't know how to get a form are filled out. You're putting these policies in order. I have seen the resident service coordinators duties of what they are supposed to do. Some of them will not even post their hours, let alone their name.	Resident Service Coordinators are trained by property management staff and work in collaboration with CHA's Resident Services Department.
192	MS. HILL	We just want some service. We want the name that goes with the title.	Resident Service Coordinators are trained by property management staff and work in collaboration with CHA's Resident Services Department.
193	MS. WASHINGTON	You gave a lot of acronyms. You said RSC. You guys have to learn what these acronyms mean, LIHTC.	MR. REHRIG: So LIHTC stands for low income housing tax credits and HOME doesn't stand for anything. We looked it up.
194	Randy Nims	Sheriff Tom Dart has advised the public on numerous occasions that too many non-violent offenders are incarcerated in Cook County jail. Now public housing has stated that tenants who have been convicted of possession and/or use of illegal drugs cannot use the grievance policy to remain in their apartments or try to be "heard" to remain in their apartment. Has CHA been informed that relapse is part of the recovery. Every day health care providers will tell you this. Where will they go?	
195	Randy Nims	Why does our "American" government insist on being the poor's momma & daddy? People spend less time in jail for powdered cocaine than crack cocaine, meaning if you have the money you spend less time in jail. I applauded the management staff who are educated and are aware that tenants asking to be heard by grieving need help, not eviction.	Thank you for your comment.
196	Randy Nims	Will you as well evict tenants who smoke cigarettes or will you give them the help they need to quit?	Thank you for your comment.