

Amended FY2014 Moving To Work Annual Plan



Original Submission: October 18, 2013
Approved: March 21, 2014
Amended Plan Approved: March 6, 2015



CHA

CHICAGO HOUSING
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Introduction

Section I: Introduction

In FY2014, as a participant in the Moving to Work (MTW) Demonstration Program, CHA will continue to be intentional in using the allowed flexibilities in its ongoing and proposed activities to not only meet the objectives of the MTW Demonstration Program, but also to creatively respond to the local need for quality, affordable housing for low-income families.

CHA and HUD signed the original MTW Agreement on February 6, 2000. The Amended and Restated MTW Agreement with CHA was fully executed on June 26, 2008 which extended CHA's participation in the MTW Demonstration Program through FY2018. Under the requirements of the MTW Agreement, CHA must submit an annual plan to HUD 75 days prior to the start of CHA's fiscal year.

CHA's FY2014 MTW Annual Plan describes current ongoing and proposed activities that either require or allow authorizations granted to CHA through the Amended and Restated MTW Agreement. CHA's current ongoing and proposed MTW activities each achieve at least one of the three MTW Statutory Objectives:

- **MTW Statutory Objective I:** Increase housing choices for low-income families.
- **MTW Statutory Objective II:** Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
- **MTW Statutory Objective III:** Reduce costs and achieve greater cost effectiveness in federal expenditures.

Overview of CHA's MTW Goals and Objectives for FY2014

Since 2000, CHA has been engaged in achieving the goals of the original Plan for Transformation: rehabilitate or redevelop 25,000 housing units in Chicago; reintegrate low-income families and housing into the larger physical, social and economic fabric of the city; provide opportunities and services to help residents improve their lives; and spur the revitalization of communities once dominated by CHA developments. In FY2013, CHA unveiled a new strategic plan, *Plan Forward: Communities that Work*, which outlines the agency's newly articulated mission and strategic goals that will guide CHA's current and future work. The key goals of Plan Forward include completing the final phase of the original Plan and coordinating public and private investments to develop vibrant communities; ensuring CHA's housing portfolio is safe, decent and sustainable; and expanding targeted services to more residents at critical milestones in their lives.

In FY2014, CHA will continue to pursue the three statutory objectives of the MTW Demonstration Program in fulfilling the commitments of the original Plan for Transformation and achieving the goals of Plan Forward. CHA has proposed new MTW activities for FY2014 and will continue ongoing MTW activities to provide more housing options for families, assist residents in achieving self-sufficiency, and increase the cost-effectiveness of public housing and Housing Choice Voucher program administration.

FY2014 Proposed MTW Activities

The following activities are proposed for FY2014.

Public Housing and HCV Programs

- ***Biennial Re-examinations for HCV and Public Housing:*** CHA proposes to expand biennial re-examinations to public housing participants in place of the current practice of conducting annual re-examinations for applicable participants. CHA currently conducts biennial re-examinations for HCV Program participants.

- **Triennial Re-examinations for Households with Only Elderly/Disabled Participants for HCV and Public Housing:** CHA proposes to implement a streamlined triennial re-examination schedule for public housing and HCV 100% fixed income households consisting of only disabled and/or elderly participants.
- **Elimination of Assets in Income Calculation After Initial Eligibility for HCV and Public Housing:** CHA proposes to expand this activity to public housing. For public housing and HCV, assets will only be calculated for initial eligibility and income from assets will only be included in the initial rent calculation.
- **Choose to Own Homeownership Program for HCV and Public Housing - Modify Program Requirements (previously Comprehensive Low-Income Home Ownership Program):** CHA proposes to institute a higher minimum income requirement for eligibility for the Choose to Own Homeownership Program.
- **Family Self-Sufficiency Program for HCV and Public Housing – Modify Program Requirements:** CHA proposes to revise the participation requirements for the Family Self-Sufficiency program for public housing and HCV participants.
- **CHA Re-entry Pilot Program:** Pending HUD approval of the FY2014 MTW Annual Plan Amendment, CHA will implement a Re-entry Pilot Program for up to 50 eligible participants who are reuniting with a family member currently living in CHA traditional public housing or CHA’s HCV Program.

Housing/Development

- **Reasonable Cost Formula and Methodologies for Redevelopment and Rehabilitation:** Pending HUD approval of the FY2014 MTW Annual Plan Amendment, CHA will utilize the reasonable cost formula for redevelopment, which was approved in FY2010, for both redevelopment and rehabilitation projects.

FY2014 Ongoing MTW Activities

Housing/Development

- **Revitalization of 25,000 Housing Units:** CHA continues to make progress toward the goal of 25,000 housing units and providing additional housing opportunities for residents.

Public Housing and HCV Programs

- **All Clear Utility Debt Assistance Program:** CHA is authorized to offer assistance to eligible CHA residents, in partnership with ComEd, to help clear utility debt so they can be current with their utility bills after receiving assistance through the program.
- **\$75 Minimum Rent for Public Housing and HCV Programs:** CHA increased the minimum rent from \$50 to \$75 in FY2009. The impact of the revised minimum rent level is an increase in rent collection revenue from residents paying the minimum rent.

Public Housing

- **Public Housing Work Requirement:** Through the implementation of a work requirement across CHA’s public housing portfolio, more residents are engaged in employment, education, job training, and community service in order to achieve goals for self-sufficiency. CHA provides case management and workforce development resources to residents to assist them in fulfilling this requirement.

- **Office of the Ombudsman:** The Office of the Ombudsman provides designated staff to address the concerns of public housing residents living in mixed-income communities and serves as a liaison between residents and CHA leadership. The office assists residents in resolving issues and adapting to their new community.

Housing Choice Voucher Program

- **Exception Payment Standards:** CHA is authorized to apply exception payment standards that may be up to 300% of HUD's published Fair Market Rents (FMRs) for the City of Chicago in order to increase housing options in opportunity areas throughout Chicago.
- **Owner Excellence – Acceptance of Passed Annual or Initial HQS Inspection for New Request for Tenancy Approval within 90 Days of Passed Date:** As part of the HCV Owner Excellence Program, CHA may approve tenancy for a unit that passed an inspection within the previous 90 days for owners participating in the Owner Excellence Program.
- **Owner Excellence – Vacancy Payments:** As part of the HCV Owner Excellence Program, CHA may provide a modest vacancy payment to eligible owners participating in the Owner Excellence Program who re-lease a unit currently in the HCV program to another HCV participant.
- **Owner Excellence – Biennial Inspections:** As another component to the Owner Excellence Program, CHA conducts biennial inspections on qualifying units, as defined by CHA, of eligible owners participating in the Owner Excellence Program.

Property Rental Assistance/Project-Based Voucher Program

- **Exceed the Limit of 25% Project-Based Voucher (PBV) Assistance in Family Properties:** CHA may increase the percent of assisted PBV units in certain projects above the regulatory limit of 25% per family building.
- **Authorization of Qualified PRA Owners/Property Managers to Perform Initial Eligibility Determinations and Reexaminations:** CHA allows qualified owners, as defined by CHA, to perform initial eligibility determinations and re-examinations of participants in the PRA Program.
- **Authorization of Qualified PRA Owners/Property Managers to Perform Annual Inspections:** CHA allows qualified owners, as defined by CHA, to perform annual inspections for PBV units.
- **PBV Contract Commitments with 16-30 Year Initial Terms (previously 30-Year PBV Contract Commitments):** To facilitate the expansion of affordable housing opportunities through the use of PBVs, CHA uses MTW authority to enter into HAP contracts for initial terms between 16 and 30 years.
- **Acceptance of City Certificates of Occupancy for Initial PRA Inspections (previously PRA Inspections):** CHA is authorized to accept the issuance of a Certificate of Occupancy by the City of Chicago as evidence of the property's compliance with Housing Quality Standards for initial PRA inspections.
- **Two-Year Requirement for PBV Participant Transition to Housing Choice Voucher:** CHA reduces turnover in PBV developments by requiring families to occupy the unit for two years, unless a supportive housing unit, before they are eligible for a Tenant-Based Voucher.
- **Payments During Initial Occupancy/Leasing – New Construction and Substantially Rehabilitated Properties:** CHA provides vacancy payments, as determined necessary on a project by project basis, during the initial

operating lease-up period in order to provide an incentive for owner participation and to ensure the long-term viability of newly constructed and substantially rehabilitated properties.

Finally, CHA will continue to utilize the single-fund budget provided through MTW participation for expanded and flexible resources for overall administration of housing assistance, capital and redevelopment activities, and special services and programs for residents.

General Housing Authority
Operating Information

Section II: General Housing Authority Operating Information

This section contains General Housing Authority Operating Information, including anticipated changes to CHA's housing stock and planned leasing and wait list activity for the public housing portfolio and Housing Choice Voucher Program in FY2014.

Overall Plan for Transformation Unit Delivery Progress

Throughout FY2014, CHA will continue to revitalize its affordable housing stock and to create new housing opportunities for low-income families in Chicago toward completing the 25,000 housing unit goal of the original Plan for Transformation. By the end of FY2014, CHA anticipates an additional 563 units toward the overall unit delivery progress, which will bring the total to 22,307 housing units or 89% of the 25,000 goal. This includes new housing opportunities through redevelopment in mixed-income communities; acquisition of public housing units; and project-based voucher units added through the Property Rental Assistance Program.

Planned FY2014 Overall Unit Delivery

IL Number	Type	Development/Program	Projected FY2014 Unit Delivery
IL002162000	Mixed-Income Redevelopment (Public Housing)	Dorchester Artist Housing	12
IL002161000		Shops and Lofts	28
IL0021570001 IL0021580001	Public Housing Acquisition	Property Investment Initiative	7
TBD		Real Estate Acquisition Program	220
N/A	Project-Based Vouchers	Property Rental Assistance Program	296
Total Planned FY2014 Unit Delivery			563

Housing Stock Information: Public Housing

Number of Public Housing Units at the Beginning of FY2014

As of 3rd quarter 2013, CHA currently has 21,189 public housing units including those offline and unavailable for occupancy.¹ This number includes all standing public housing units and is not the same as CHA's progress toward the 25,000 unit delivery goal. CHA public housing units are categorized in two ways:

- *Online/Leasable Units:* 18,303 units - All occupied units plus those that are vacant but available for occupancy/leasing. CHA's vacancy rate is calculated based on online, leasable units.
- *Offline Units:* 2,886 units - Units unavailable for occupancy and offline for HUD-approved reasons such as pending demolition/disposition, ADA modification, routine or major capital maintenance, non-dwelling use, on-site employee use, relocation resources, and pending redevelopment.

¹ CHA's progress toward the 25,000 unit delivery goal is not the same as the total number of CHA public housing units, or the number of online public housing units. Public housing units renovated or redeveloped through the Plan ten to twelve years ago, though counted toward unit delivery progress, may now temporarily be offline for reasons described in this section. Moreover, project-based vouchers (PBVs) administered through CHA's PRA Program are not CHA ACC/public housing units, but do provide needed affordable housing opportunities and are counted toward the overall goal of 25,000 revitalized housing units.

CHA Public Housing/ACC Units as September 30, 2013

	Total Units	Explanation
Online/Leasable Units	18,303	Includes occupied and vacant units. CHA's vacancy rate is calculated based on online units.
<i>Occupied Units</i>	17,970	Includes online units which are currently occupied/leased.
<i>Vacant Units</i>	333	Includes online units which are currently vacant and available for occupancy.
Offline Units	2,886	Includes units offline and unavailable for occupancy for HUD-approved reasons described below.
Total Public Housing (ACC) Units*	21,189	Includes all standing public housing units (offline and online) which CHA owns and is responsible for.

*Does not include 339 units at city/state PBV sites (Lathrop Elderly, Harrison Courts, and Loomis Courts) which are not public housing units.

Offline Unit Summary

A total of 2,886 public housing units in CHA's portfolio are currently offline and unavailable for HUD-approved reasons, including:

- **Pending Redevelopment/Planning**: Includes sites with redevelopment planning underway; specific timelines for bringing new units online are pending finalization of plans.
- **Major or Routine Capital Maintenance**: Includes sites undergoing routine repairs or maintenance, updates to align with building requirements, ADA modifications and major capital maintenance projects.
- **Pending Demolition or Disposition Activity**: Units currently pending demolition or disposition; these units will not come back online.
- **Non-Dwelling Use**: Includes units used for service provider offices, property management offices and on-site employees.

The following table shows the number of offline units by category as of 3rd quarter 2013. (Please refer to p. 33 for information on CHA's long term plan for offline units.)

CHA Offline Unit Summary as of September 2013

Category	Total Units	% of Offline Units
Pending Redevelopment/Planning	2,101	72.8%
Major or Routine Capital Maintenance	475	16.5%
Pending Demolition/Disposition Activity	41	1.4%
Non-Dwelling Units	269	9.3%
Total Offline Units	2,886	100%

More information on the status of offline units is available and updated quarterly on CHA's website (www.thecha.org).

General Description of Planned Significant Capital Expenditures by Development

The following chart describes CHA's estimated capital expenditures, by both development and fund, for FY2014.

FY2014 Capital Program Estimated Capital Expenditures (By Development and Fund)

REDEVELOPMENT/ACQUISITION	HOPE VI Revitalization	Capital Fund FY2014 Grant	Capital Fund (Prior Year Grant)	MTW Block Grant/ Reserve	TOTALS
Real Estate Acquisition Program/REAP	-		-	28,000,000	\$28,000,000
Mixed Income/Mixed-Finance					-
Parkview/Fannie Emanuel Senior Apts	-	-	-	800,000	800,000
Roosevelt Square Phase 2A (ABLA)	1,608,500	-	-	405,000	2,013,500
Dorchester Artist Housing	-	-	2,875,000		2,875,000
Parkside IIB (Cabrini Extension North)	300,000	-	-	5,505,000	5,805,000
Westhaven/Horner SuperBlock	-	-	-	1,405,000	1,405,000
Lathrop Homes Phase 1 (Predevelopment)	-	-	-	500,000	500,000
Legends South Phase C3 (Robert Taylor)	4,100,000	-	-	4,803,091	8,903,091
City Gardens (former Maplewood Courts site)	3,200,000	-	-	4,869,548	8,069,548
Park Boulevard (Stateway Gardens)	-	-	-	12,135,000	12,135,000
Washington Park- 45th Phase 1 (Predevelopment)	-	-	-	300,000	300,000
Rosenwald	-	-	-	12,800,000	12,800,000
Mixed Income/Mixed Finance Developments	9,208,500	-	2,875,000	43,522,639	55,606,139
Other	-	-	-	14,581,750	14,581,750
Total Redevelopment/Acquisition Budget	9,208,500	-	2,875,000	86,104,389	98,187,889
CAPITAL MAINTENANCE/CONSTRUCTION PROJECTS					
Family					
Brooks	-	-	-	5,148,334	5,148,334
Altgeld	-	43,764,063	-	10,135,937	53,900,000
Dearborn Homes	-	-	-	1,250,000	1,250,000
Henry Horner	-	-	-	1,728,056	1,728,056
Lowden Homes	-	1,139,180	-	-	1,139,180
Family Developments	-	44,903,243	-	18,262,327	63,165,570
Senior Developments	-	17,132,929	60,907,294	21,566,404	99,606,627
Scattered Sites	-	-	-	22,435,643	22,435,643
Other	-	2,457,376	-	11,493,818	13,951,194
Family Investment Center	-	-	-	943,818	943,818
Facilities Assessments	-	2,000,000	-	-	2,000,000
Washington Park Boy & Girls Club	-	457,376	-	-	457,376
Web Base Capital Maintenance Application	-	-	-	350,000	350,000
Program Management Organization	-	-	-	4,400,000	4,400,000
Contingency	-	-	-	5,800,000	5,800,000
CCD Total Capital Budget	-	64,493,548	60,907,294	73,758,192	199,159,034
CAPITAL MAINTENANCE /ADMINISTRATIVE/DEBT SERVICE					
Other Capital Requirements	-	9,542,750	-	19,555,084	29,097,834
TOTAL CAPITAL BUDGET	9,208,500	74,036,298	63,782,294	179,417,665	326,444,757

Public Housing Units to Be Added in FY2014

In FY2014, CHA anticipates adding a total of 267 new public housing units through mixed-income housing redevelopment (40 units) and public housing acquisition initiatives (227 units). The following section describes these units in more detail.

Mixed-Income Housing Unit Delivery in FY2014**Dorchester Artist Housing (IL002162000)**

CHA plans to deliver 12 public housing units in FY2014 as part of the redevelopment of *Dorchester Artist Housing* on Southeast scattered site property (*Dante/Harper- Southeast SS/IL2-102C*). This innovative mixed-income development will not only provide quality housing opportunities but will support the community's art culture and burgeoning art district. The site will include a total of 32 rental units, including 12 public housing, 11 affordable and 9 market rate. Of the 12 public housing units, one will be accessible and one will be sensory accessible. A small onsite art center will be developed to provide space for community art programming supported by local and tenant volunteer artists. The financial transaction closed on September 27, 2013 and the developer began construction in October 2013, with projected unit delivery in the 4th quarter of FY2014.

Shops and Lofts (IL002161000)

As part of the ongoing revitalization of the South Cottage Grove commercial corridor, construction of *Shops and Lofts* began in the first quarter of FY2013 and will deliver 28 public housing units in FY2014. The development will provide rental options within a mixed-income community setting along with new retailers to offer quality goods and services needed in this neighborhood. The development will consist of five buildings - a five-story main building anchored at the corner of 47th Street and Cottage Grove, and four separate residential buildings along South Evans Avenue. The residential portion of this project will include a total of 96 mixed-income rental units, including 28 public housing, 44 affordable and 24 market rate units. Of the 28 public housing units, three are accessible units. All units are projected for delivery by the 3rd quarter of 2014. The retail portion will include a Walmart Neighborhood Market grocery store, along with a mixture of smaller national and local retail businesses.

Former Property Investment Initiative Program Final Unit Delivery in FY2014

CHA launched the former Property Investment Initiative (PII) in January 2009 as a strategy for offsite housing acquisition; however CHA decided to phase out the program and consider new acquisition strategies. In FY2014, the final seven of the acquired 30 PII public housing units will be available for occupancy. These units were initially projected for completion in FY2013.

Planned FY2014 Mixed-Income Public Housing Delivery by Bedroom Size

IL Number	Development	Bedroom Size				Total Planned FY2014 Units
		1	2	3	4	
IL002162000	Dorchester Artist Housing	0	4	8	0	12
IL002161000	Shops and Lofts	9	19	0	0	28
IL0021570001 IL0021580001	Property Investment Initiative	0	0	5	2	7
Total FY2014 Mixed-Income Delivery		10	25	16	6	47

Real Estate Acquisition Program Unit Delivery in FY2014

CHA launched a new real estate acquisition program in FY2013 as a strategy for offsite acquisitions of public housing units and multifamily properties using traditional real estate acquisition processes primarily in neighborhoods with low percentages of CHA-subsidized housing that are accessible to jobs and public transportation. CHA released a Request for Proposals (RFQ) in July 2013 to solicit a pool of developers interested in partnering with CHA to acquire units or properties. CHA anticipates selection and approval of pre-qualified developers by the end of FY2013. CHA will work with HUD for any necessary approvals for new acquisition strategies.

The target bedroom mix for this initiative is approximately 35% one-bedroom, 40% two-bedroom, 20% three-bedroom and 5% four- bedroom or larger. The targeted number of accessible units is based on the distribution of CHA units by region- north, west, central and south. The current targeted regional distribution is 5.3% mobility accessible and 2.1% sensory accessible across regions. An alternative regional distribution may be established in the future. Public housing units acquired through this program will be counted toward the overall unit delivery progress once they become available for occupancy. In FY2014, CHA plans to provide 220 public housing units for occupancy through the program.

Additional Pending Redevelopment/Planning Activity

Altgeld Gardens/Phillip Murray Homes (IL002002000/IL002002100/IL002023000)

A comprehensive Master Planning process in FY2013 explored and analyzed the existing conditions, land uses, and community facilities in order to establish a revitalization model that will build upon CHA's existing capital improvement investments and develop a healthy, vibrant community. Upon completion of the Master Plan, implementation will be ongoing through FY2014.

Frances Cabrini Rowhouses, William Green Homes and Cabrini Extension South (IL002089000)

In FY2013, CHA completed a development zone plan with the assistance of the City of Chicago's Department of Housing and Economic Development, the Chicago Park District, the Chicago Department of Transportation and Chicago Public Schools, which proposes preferred land uses including housing, retail, open space and other uses as well as reintegration of the street grid. In FY2014, CHA will evaluate developer proposals received through this process. As part of the zone development process, CHA may submit in FY2014, a demolition/disposition application for all or some of the 440 non-rehabilitated units at Frances Cabrini Rowhouses. Depending on the timing of the application, some demolition may occur in FY2014.

Harold Ickes Homes (IL002016000)

CHA plans to issue a joint developer solicitation with the City of Chicago in FY2014 to redevelop the former Ickes site as a mixed-income, mixed-use development, including public housing and other residential, commercial, institutional, and recreational components.

Henry Horner Homes- Horner Superblock (IL002093000)

After a series of meetings with counsel for the Horner Residents Committee (HRC), Brinshore-Michaels (the developer), HUD, the Horner working group, and the Gautreaux plaintiffs, and residents, CHA and the HRC reached a settlement in principle in this matter, pending an Agreed Order.

In FY2014, CHA expects to close on the financial transaction and for the developer to begin construction in the 3rd quarter of FY2014. CHA, Brinshore-Michaels and HRC will coordinate efforts regarding relocation to ensure a smooth process for the residents. The redevelopment of the Horner Superblock will transform 201 public housing units into a mixed income site. The current estimated unit mix includes approximately 90-95 public housing units. The final number will be negotiated in the Agreed Order. Occupancy of the redeveloped property is expected in FY2015.

Lathrop Homes (IL002022000)

In FY2013, CHA along with the developer, Lathrop Community Partners, and the Lathrop Working Group continued with the robust community planning process and delivered a Master Plan for the redevelopment of the Lathrop Homes. The development is planned to be a combination of historically preserved housing, new housing, retail and other amenities on the former Julia C. Lathrop Homes property. CHA may submit in FY2014, a demolition/

disposition application for all or some of the 925 non-rehabilitated units at this site. Depending on the timing of the application, some demolition may occur in FY2014. In FY2014, CHA and the developer will undertake the site and architectural design process in preparation for a Phase I closing in FY2015.

LeClaire Courts and Extension (IL002024000)

In FY2013 CHA completed a transportation study on the LeClaire Courts property in collaboration with Chicago Metropolitan Agency for Planning (CMAP). CHA will incorporate the transportation study into an overall development zone planning design process to start in 2013 and conclude in FY2014. The development zone plan will identify housing, retail, new streets (if required) and other land uses throughout the property.

Legends South Phase C-3 (IL# to be assigned upon closing)

In FY2014, CHA plans to close the financial transaction and for the developer to start construction of Legends South Phase C-3, an off-site mixed income phase as part of the redevelopment of Robert Taylor Homes. Phase C-3 consists of 71 total rental units, including 30 public housing units. Unit delivery is projected in FY2015.

Park Boulevard Phase IIB (IL# to be assigned upon closing)

CHA is working to close the financial transaction for Park Boulevard Phase IIB mixed income rental transaction as part of the redevelopment of the former Stateway Gardens. Phase IIB is the second sub-phase of the HOPE VI redevelopment grant and consists of 108 rental housing opportunities, including 37 public housing units. Development will take place both onsite and off-site to include a mixed-use building with ground level commercial space.

Parkview/Fannie Emanuel Senior Apartments (IL002065000)

CHA will act as master developer for the redevelopment of Parkview/Fannie Emanuel Senior Apartments to provide 100% low-income housing for seniors. CHA intends to conduct the redevelopment under HUD's Rental Assistance Demonstration (RAD) program and expects to a RAD portfolio application, including this site, by November 2013. Construction is planned to begin in FY2014 with unit delivery in FY2016.

Roosevelt Square Phase 2A (IL# to be assigned upon closing)

In FY2014, CHA anticipates closing the financial transaction for Roosevelt Square Phase 2A as part of the redevelopment of the former ABLA Homes. Phase 2A Rental will consist of two 60-unit rental apartment buildings for a total of 120 units, including 96 market rate and 24 public housing units. CHA anticipates closing on Phase 2A in FY2014 and disbursing a combination of HOPE VI and public housing capital grant funds allocated for this development. While this phase is anticipated to be under construction by the developer in FY2014, unit delivery will not occur until FY2015.

Rosenwald Apartments

The historic Michigan Boulevard Apartments (Rosenwald) located in the culturally rich Bronzeville community has been vacant since 1999 and blighted the community for over a decade. CHA has been approached to provide support to this City of Chicago project to historically renovate the building for adaptive reuse that will provide quality affordable senior and family housing opportunities, including 120 senior units for public housing residents. The project also includes development of commercial space along 47th St. to help foster local businesses.

West End/City Gardens (IL# to be assigned upon closing)

In FY2014, CHA anticipates closing on the financial transaction and for the developer to start construction of City Gardens, on the former Maplewood Courts city/state site, as the next phase in the revitalization of the former Rockwell Gardens and as part of the West End community. City Gardens will be developed by Brinshore-Michaels

and consists of 76 mixed income rental units, including 25 public housing units. Unit delivery is expected in early FY2015.

Additional Planned Capital Maintenance and Other Rehabilitation Activity in FY2014

CHA plans to continue or begin the following projects in FY2014:

- Life Safety code compliance work at various Senior Housing sites, to be completed by end of FY2014.
- Modifications at various CHA-owned non-dwelling spaces to meet ADA compliance.
- ADA modifications to Family Housing properties at Lowden Homes (IL002025000), Brooks Homes (IL002001000), and Horner-Westhaven (IL002093000).
- Major Capital Maintenance in CHA's scattered site properties including renovation of vacant offline units.
- Mechanical, electrical, plumbing, and/or envelope improvements to several senior buildings including Caroline Hedger Apartments (IL002076000), Patrick Sullivan Apartments (IL0020670000), Daniel Burnham Apartments (IL002075000), Judge Slater Apartments and Annex (IL002084000), Major Lawrence Apartments (IL0020086000, Long Life Apartments (IL002066000), Lincoln Perry Apartments (IL002052000), Lincoln Perry Annex (IL002052100), Armour Square Apartments and Annex (IL002046000), and Minnie Riperton Apartments (IL002078000).

Rental Assistance Demonstration (RAD) Program

In October 2013, CHA submitted a portfolio application to HUD to utilize RAD for approximately 64 public housing properties with 10,935 units over the next two years (2014-2015). CHA plans to utilize RAD to refinance some properties and to support new initiatives that will expand affordable housing opportunities. More than 40 stakeholder, resident and community meetings were held prior to the application to educate people about the benefits of RAD and how it can be used to support long-term affordability.

After the RAD portfolio application was submitted, CHA learned that the 60,000 unit maximum currently available for RAD had already been reached through applications received by HUD. However, CHA has continued the internal planning process for RAD in the event that the number of units available for the program is increased, or if any of the earlier applications do not move forward. In anticipation of a potential RAD award in FY2014, CHA is proceeding with required revisions to the annual plan as described in this section and in the Appendices.

In the submitted portfolio application, CHA has elected to transition the proposed RAD units to the Project-Based Voucher program. CHA continues to work with HUD and to develop policies for a potential RAD conversion. CHA will release updates to the HCV Administrative Plan that reflect RAD-specific policies, as well as a lease or lease addendum for RAD properties, for public comment in the future as required. CHA will adhere to the regulations of the RAD program, including the incorporation of key public housing provisions that protect residents' interests and encourage resident participation and self-sufficiency.

Further details on the RAD program and required information are included in the Appendices.

Public Housing Units to Be Removed from Inventory in FY2014

CHA anticipates the following potential demolition activity in FY2014, pending finalization of plans and HUD approval of associated future demolition applications.

Lathrop Homes

As part of the redevelopment of Lathrop Homes, CHA may submit in FY2014, a demolition/disposition application for all or some of the 925 non-rehabilitated units at this site. Depending on the timing of the application, some demolition may occur in FY2014.

Frances Cabrini Row Houses

In FY2013, CHA completed a development zone plan with the assistance of the City of Chicago's Department of Housing and Economic Development, the Chicago Park District, the Chicago Department of Transportation and Chicago Public Schools, which proposes preferred land uses including housing, retail, open space and other uses as well as reintegration of the street grid. In FY2014, CHA will evaluate developer proposals received through this process. As part of the zone development process, CHA may submit in FY2014, a demolition/disposition application for all or some of the 440 non-rehabilitated units at Frances Cabrini Rowhouses. Depending on the timing of the application, some demolition may occur in FY2014.

Scattered Sites

CHA plans to demolish 7 scattered site units in FY2014 due to obsolescence. After assessments, the costs to rehabilitate these units exceed the current value.

FY2014 Scattered Site Demolition		
Scattered Site Region/IL Number	Address	Planned Units for FY2014 Demolition
SS-Southeast IL002033000	8840 S. Escanaba Avenue	3
	10322 S. Avenue M	1
	8754 S. Buffalo Avenue	2
	8721 S. Buffalo Avenue	1
Total Units		7

Disposition Activity

CHA removes property through disposition activity for the purpose of mixed-income redevelopment and other broader community planning. The following table shows anticipated disposition in FY2014. Disposition activity previously included in the FY2013 annual plan may be carried out in FY2014.

Section II: General Housing Authority Operating Information

FY2014 Planned Property to be Removed through Disposition Activity

IL Number	Development/Site	Northern Boundary	Southern Boundary	Eastern Boundary	Western Boundary	Type of Disposition	Type of Property/Purpose of Disposition
IL002017000	Former Ida B. Wells, Wells Extension, Darrow Homes	East 37th Street	East 39th Street	South Rhodes	South King Drive	Ground Lease, Fee Simple, and/or Land Swap	CHA plans for the disposition of vacant land in exchange for market value for the development of mixed-income housing, retail or other land uses
IL002039000	Former Washington Park (45th and Cottage- Phase I)	East 44th Street	East 46th Street	Cottage Grove	Evan Street	Ground Lease, Fee Simple, and/or Land Swap	CHA plans for the disposition of vacant land for the development of mixed-income housing, retail or other land uses.
IL002039000	Washington Park	6225-45 S. Wabash				Ground Lease or Fee simple	CHA plans for the disposition of a non-dwelling structure which formerly housed a community center. The property is excess to CHA's needs for this area.
IL002022000	Lathrop Homes	West Wellington Avenue	2600 North Hoyne/Levitt	2600-2800 N. Damen Avenue, 2800-3000 N. Clybourn Avenue	North Branch of Chicago River	Ground Lease, Fee Simple, and/or Land Swap	In FY2014, CHA may submit a demolition/disposition application for all or some of the 925 non-rehabilitated units as part of the redevelopment of Lathrop Homes.
IL002001000	ABLA/Roosevelt Square Redevelopment (Roosevelt Square Phase 2A Rental/For-Sale and Community Park)	West Cabrini Street	15th Street	Blue Island	Ashland Avenue	Ground Lease, Fee Simple, and/or Land Swap	CHA will lease or sell the currently vacant land for the development of mixed-income housing, retail or other land uses. (This does not include the redeveloped portion of Roosevelt Square).
IL002089000	Former William Green Homes	Clybourn	Division	Scott	Halsted	Ground Lease, Fee Simple, and/or Land Swap	CHA plans for the disposition of vacant land for the development of mixed-income housing, retail or other land uses.
IL002089000	Former Cabrini Extension South	Wendell	Chicago	Orleans	Hudson	Ground Lease, Fee Simple, and/or Land Swap	CHA plans for the disposition of vacant land for the development of mixed-income housing, retail or other land uses.
IL002089000	Frances Cabrini Row Homes	Oak Street	Chicago	Hudson	Larrabee	Ground Lease, Fee Simple, and/or Land Swap	In FY2014, CHA may submit a demolition/disposition application for all or some of the 440 non-rehabilitated units at Frances Cabrini Rowhouses.
IL002033000	Scattered Sites South East	10527 S. Corliss				Fee Simple	CHA plans for the disposition of a vacant 2-unit property requiring substantial repair that would exceed the potential market value of the property. Disposition is for the fee simple conveyance via public offer or sales agent as is.

Housing Stock Information: Housing Choice Voucher Program

Anticipated Total Number of Housing Choice Vouchers Units Authorized

In FY2014, CHA forecasts the authorization of 52,419 Housing Choice Vouchers (HCVs), including 50,407 MTW HCVs (11,899 designated as MTW block grant vouchers and 38,508 designated for leasing) and 2,012 non-MTW vouchers. Given the demand for affordable housing, CHA plans on an increase in HCV housing opportunities in FY2014. The following table details the breakdown of vouchers to be authorized by program type based on current CHA projections.

FY2014 Planned HCVs Authorized	
MTW HCVs	
<i>Block Grant</i>	11,899
<i>Leasing</i>	38,508
MTW Subtotal	50,407
Non-MTW HCVs	
<i>VASH</i>	685
<i>Mainstream 5-Yr</i>	50
<i>Mod Rehab</i>	1,277
Non-MTW Subtotal	2,012
Total HCVs Planned For Leasing	40,520
Total HCVs Authorized	52,419

Number of Housing Choice Voucher Units to Be Project-Based in FY2014

CHA has continued to expand the use of project-based vouchers (PBVs) to increase housing options for low-income families in the region through the Property Rental Assistance (PRA) Program. PBVs are issued directly to property owners, unlike tenant-based vouchers, and remain with the unit if a tenant moves out. CHA anticipates that 2,899 PBVs will be utilized in properties with units under either Housing Assistance Payment (HAP) contracts or an Agreement to Enter into a Housing Assistance Payment (AHAP) by the end of FY2014. This includes 2,807 total PBV units under HAP contract and 92 under AHAP.

The following sections and tables describe CHA's use of PBVs in more detail.

Certificates Converted to PBVs

CHA continues to administer 478 PBVs that were converted from Project-Based Certificates when HUD revamped the program in FY1995. These 478 PBV units are located in Chicago and counted toward overall unit delivery progress.

City/State PBVs

CHA continues to administer 339 PBV units across three city-state sites: Harrison Courts, Loomis Courts, and Lathrop Elderly. These 339 PBV units are located in Chicago and counted toward overall unit delivery progress.

PRA Supportive Housing

The PRA Supportive Housing program, in partnership with the Corporation for Supportive Housing and the City's Department of Family and Supportive Services, continues to pursue high-quality affordable housing for families and individuals in need of comprehensive supportive services. The partnership has identified several target populations and has expanded the number of service providers and resources to address their needs. Target populations include those who are homeless or at risk of becoming homeless, those facing serious persistent life challenges such as HIV/AIDS, mental illness, alcohol/substance abuse, veterans in need of supportive services, young single parents and persons with physical and/or developmental disabilities.

In FY2014, CHA expects an additional 262 new supportive housing PBV units under HAP contracts to be counted toward unit delivery pending CHA Board approval. By the end of FY2014, CHA anticipates a total of 1,053 supportive housing PBV units to be counted toward overall unit delivery including units completed under the former Chicago Supportive Housing Initiative and those projected to be placed under HAP contracts through the end of FY2013 and FY2014.

Regional Housing Initiative

The Regional Housing Initiative (RHI), formed in 2002, is a consortium of seven regional housing authorities (CHA, Housing Authority of Cook County, Housing Authority of Joliet, McHenry County Housing Authority, Lake County Housing Authority, Waukegan Housing Authority and Oak Park Housing Authority) that have pooled project-based vouchers to allocate to competitively selected developments in each housing authority's jurisdiction. Through RHI, property rental assistance is awarded to developers committed to preserving and/or increasing the supply of affordable rental housing and expanding affordable housing options located near employment centers and/or public transportation providing easy access to employment opportunities. RHI is staffed by the Metropolitan Planning Council (MPC) and works closely with the Illinois Housing Development Authority (IHDA) when reviewing applications that are being considered by IHDA for Low Income Housing Tax Credits.²

In FY2012 HUD provided \$1 million to fund a three-year pilot program to expand RHI's capacity to increase quality affordable housing options throughout the region near jobs, transit, schools, shopping and other key neighborhood amenities for eligible families on the participating PHAs waiting lists. Under the Pilot, a central referral system was established that consists of applicants from each PHA's existing waiting lists who expressed interest in moving to other geographic areas throughout the region. In FY2014, CHA intends to maintain its participation in the RHI Pilot Program in order to offer applicants on CHA's waiting list broader housing alternatives in opportunity areas.

In FY2014, CHA expects no new additional RHI PBV units. A total of 152 CHA PBV units in the region are under HAP contract through RHI. Of these, 69 are under contract in Chicago and counted toward unit delivery progress.

Other Non-Supportive PRA Housing

Throughout FY2014 CHA will continue to expand high-quality affordable housing opportunities in healthy and revitalizing neighborhoods in Chicago for families and individuals on CHA's waiting lists by providing PBV rental subsidies to additional, non-supportive housing units under the PRA program. CHA will continue to market the PRA program to developers and building owners through the ongoing solicitation and continue to accept applications on a rolling basis throughout the year.

² For more information on RHI, see MPC's website at www.metroplanning.org.

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In FY2014, CHA expects an additional 34 non-supportive housing PBV units under HAP contracts to be counted toward unit delivery pending CHA Board approval. By the end of FY2014, CHA projects a total of 785 non-supportive housing PBV units under HAP in Chicago to be counted toward unit delivery progress.

Summary of PBV Units Counted Toward Overall Unit Delivery Progress

As described in previous sections, CHA projects an additional 296 new PBV units under HAP contracts in Chicago in FY2014. This includes 262 units through PRA Supportive Housing and 34 units through other non-supportive PRA activity. By the end of FY2014, CHA anticipates a total of 2,724 PBV units in Chicago counted toward unit delivery progress.

Planned PBVs Under Housing Assistance Payments (HAP) through FY2014

PBVs under HAP Contracts through FY2011

PBV Category	Site/Property	Total Number of Units at the Site	Number of PBVs Under HAP	Site Description
City/State	Harrison Courts	123	123	2910, 2930 & 2950 West Harrison Street; original HAP was signed in 2005; Elevator Building for low income families
City/State	Loomis Courts	124	124	1314 – 1342 West 15th Street, original HAP was signed in 2005; Elevator Building for low income families
City/State	Lathrop Elderly	92	92	2717 N. Leavitt Avenue, original HAP was signed in 2005; Elevator Building for seniors
Certificates converted to PBVs	Major Jenkins Apartments	160	80	5016 N. Winthrop; original HAP was signed in 1995; Elevator building for homeless individuals.
Certificates converted to PBVs	Deborah's Place II	39	39	1530 N. Sedgwick; original HAP was signed in 1995; Elevator building for homeless women
Certificates converted to PBVs	Humboldt Park Residence	68	20	1152 N. Christiana; original HAP was signed in 1996; elevator building for homeless individuals
Certificates converted to PBVs	East Park Apartments	152	150	3300 W. Maypole; original HAP was signed in 1995; Elevator building for homeless individuals
Certificates converted to PBVs	Diversey Manor (Formerly Diversey Court)	51	50	3721 W. Diversey; original HAP was signed in 1994; 3-story walk-up for low income families
Certificates converted to PBVs	Wabash Apartments	24	24	6100 S Wabash; original HAP was signed in 1995; 3-story walk-up for low income families
Certificates converted to PBVs	Anchor House	115	115	1230 W. 76th Street; original HAP was signed in 1997; 3-story walk-up for low income families. 6 of the 115 units are currently offline as of 12/31/11.
Other PBV Activity prior to PRA	Roosevelt Tower	126	126	3440 W. Roosevelt in the Lawndale Community Area; New construction of an 8-story building for seniors

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PBVs under HAP Contracts through FY2011				
PBV Category	Site/Property	Total Number of Units at the Site	Number of PBVs Under HAP	Site Description
PRA Supportive Housing (Chicago Supportive Housing Initiative)	600 S. Wabash Apartments	169	77	618 S. Wabash in the South Loop Community Area; New construction of an 8-story SRO for homeless individuals
Other PBV Activity prior to PRA	Evergreen Tower II	101	10	1343 N. Cleveland in the Near North Side Community Area; An existing building midrise 11-stories for seniors
Regional Housing Initiative	Wentworth Commons	51	10	11045 S. Wentworth in the Roseland Community Area; New construction of a 4-story building for families
Regional Housing Initiative	Leland Apartments	137	14	1207 W. Leland in the Uptown Community Area; Rehabilitation of a 6-story, primarily SRO building for individuals in need of supportive services
Other PBV Activity prior to PRA	Leotyne Apartments	53	14	City Owned scattered sites around 42nd & Cottage Grove in the Grand Boulevard Community Area; New construction of seven 2-flats for families
Other PBV Activity prior to PRA	Liberty Square	66	16	3608-3715 W Flournoy & 705-723 S Independence Blvd. in the East Garfield Park Community Area; New construction of twelve 3-flats for families
Other PBV Activity prior to PRA	South Park Plaza	134	34	2600 S King Drive in the Near South Side Community Area; New construction of a 4-story elevator building and 46 townhomes for families
PRA Supportive Housing (Chicago Supportive Housing Initiative) PBV/VASH	St. Leo's Residence for Veterans	141	50	7750 S. Emerald in the Auburn- Gresham Community Area; New construction of a 4-story building for homeless veterans
PRA Supportive Housing (Chicago Supportive Housing Initiative) PBV/VASH	St. Leo's Residence for Veterans	(total units previously counted)	40	Amendment Contract for 7750 S. Emerald in the Auburn- Gresham Community Area; New construction of a 4-story building for homeless veterans. St. Leo's Residence signed an amendment contract in FY2010 for 40 VASH PBV units. With the 50 PBVs under HAP prior to FY2010, the site now has a total of 90 PBV/VASH units.
PRA Supportive Housing (Chicago Supportive Housing Initiative)	Near North SRO	96	46	1244 N. Clybourn in the Near North Community Area; New construction of a 5-story SRO for homeless individuals
Other PBV Activity prior to PRA	Senior Suites of Auburn-Gresham	85	17	1050 W. 79th Street in the Auburn Gresham Community Area. New construction of a 6-story building for seniors

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PBVs under HAP Contracts through FY2011				
PBV Category	Site/Property	Total Number of Units at the Site	Number of PBVs Under HAP	Site Description
Regional Housing Initiative	G & A Residence at Spaulding	36	9	1750 N. Spaulding in the Logan Square Community Area; Existing Building containing 5-stories for families
Regional Housing Initiative/Other PBV Activity prior to PRA	North Avenue Apartments	24	16	2634-54 W. North Ave. in the West Town Community Area; Rehabilitation of a brick walk-up building for families. This development received 6 RHI PBVs and 10 non-RHI PBVs.
PRA Supportive Housing (Chicago Supportive Housing Initiative)	Harriet Tubman Apartments	28	14	5751 S. Michigan in the Washington Park Community Area; Rehabilitation of a walk-up building for families needing supportive services
PRA Supportive Housing (Chicago Supportive Housing Initiative)	Trumbull Apt	25	13	1310 S. Spaulding (8 PBVs) and 1424 S. Trumbull (5 PBVs) in the North Lawndale Community Area; Rehabilitation of two walk-up buildings for families needing supportive services
PRA Supportive Housing (Chicago Supportive Housing Initiative)	Washington Park SRO	63	32	5000 S. Indiana in the Washington Park Community Area; Rehabilitation of a former YMCA 5-story building for homeless individuals.
Regional Housing Initiative	Casa Kirk	29	5	3242-60 E. 92nd in the South Chicago Community Area; New construction of a brick walk-up for families
Other PBV Activity prior to PRA	G & A Residence a Eastgate Village	117	35	300 E. 26th Street in the Bronzeville Community Area; New construction of a 9-story building for seniors
Other PBV Activity prior to PRA	Rosa Parks Apartments	94	26	9 city owned Parcels in the Humboldt Park Community Area; New construction of 6 scattered buildings for families Rosa Parks Apartments was a phased-in HAP with one effective date of 7-1-09. In FY2009, 13 units were phased in; in FY2010 the remaining 13 units were phased in as they were completed. In FY2012, 1 unit was swap from Contract.
Regional Housing Initiative	Casa Morelos	45	9	2013-19 S. Morgan in the Pilsen Community Area; New construction of a 7-story building for families
PRA Activity Working Families	Wilson Yards Family	80	16	1026 W. Montrose in the Uptown Community Area; New construction of a 7-story building for families
PRA Activity Senior Housing	Wilson Yards Senior	98	20	1036 W. Montrose in the Uptown Community Area; New construction of a 7-story building for seniors

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PBVs under HAP Contracts through FY2011				
PBV Category	Site/Property	Total Number of Units at the Site	Number of PBVs Under HAP	Site Description
PRA Supportive Housing (Chicago Supportive Housing Initiative)	Englewood Supportive Housing	99	50	901 W. 63rd Street in the Englewood Community Area; New construction of a 6-story SRO for homeless individuals
PRA Activity Senior Housing	Wrightwood Senior Apartments	85	17	2815 W 79th in the Ashburn Community Area; New construction of a 6-story building for seniors
PRA Activity Senior Housing	Casa Maravilla	73	15	2021 S. Morgan in the Pilsen Community Area; New construction of a 5-story midrise building for seniors
PRA Activity Senior Housing	Archer Avenue Senior Residence	55	12	2928 S Archer Ave in the Bridgeport Community Area; Existing Housing of a 5-story Elevator building for seniors
PRA Activity Senior Housing	Hollywood House	197	51	5700 N Sheridan Road in the Edgewater Community Area; Rehabilitation of a 12-story Elevator building for seniors
Regional Housing Initiative	Nuestro Hogar	31	8	Scattered Site in Humboldt Park community area. Existing Housing of a 4-story walk-up building for families
PRA Activity Working Families	Dr. King Legacy Apartments (MLK)	45	10	3800-24 W. 16th Street in the North Lawndale Community Area; New construction of a 3-story building for working families
PRA Activity Senior Housing	Hancock House	89	18	12045 S. Emerald in the West Pullman community area; New construction of a 7-story building for seniors
PRA Activity Senior Housing	Victory Center of South Chicago Senior Apartments	72	18	3251 E 92nd in the South Chicago Community Area; New construction of a 5-story building for seniors
Chicago Supportive Housing Initiative	Bettendorf Place	24	19	8500 S. Sangamon in the South Chicago community area; Rehabilitation of an old convent into a studio building for homeless individuals with HIV/AIDS
PRA Supportive Housing (Chicago Supportive Housing Initiative)	Hope Manor	50	30	3455-67 W. Madison in the East Garfield Park community area; New construction of a 4-story building for homeless veterans
PRA Activity Working Families	Independence Apartments	42	9	Scattered Site on Independence & Arthington Avenues in the North Lawndale community area. New construction of seven 3-story 6-flats for working families
PRA Activity Senior Housing	The Suites of Autumn Green at Wright Campus	36	8	4255 N. Oak Park in the Dunning community area; New construction of a 4-story building for seniors
PRA Activity Working Families	Greenwood Courts	48	7	4431-37 S Greenwood Ave in the Kenwood community; Existing Housing of 4-story building for working families

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PBVs under HAP Contracts through FY2011				
PBV Category	Site/Property	Total Number of Units at the Site	Number of PBVs Under HAP	Site Description
PRA Activity Working Families	Nuestro Hogar	31	3	Scattered Site in Humboldt Park community area. Existing Housing of a 4-story walk-up building for families
PRA Activity Supportive Housing	Branch of Hope	100	58	5628-30 S Halsted Street in the Englewood community; Existing Housing of 3-story building for formerly homeless individuals and veterans
PRA Activity Supportive Housing	Sankofa House	58	36	4041 W Roosevelt Road in the North Lawndale community; Existing Housing of 5-story building for individuals and intergenerational families that need supportive services
PRA Activity Working Families	Barnes Real Estate	16	6	Scattered Site in the Little Village, West Town, South Lawndale, Logan Square, East Garfield Park and Hermosa community areas. Existing Housing of four 2-story, one 3-flat and one 4-story building(s) for working families
PRA Activity Senior Housing	G&A Senior Residence at West Ridge	99	19	6142 N California Ave in the West Rogers Park community area, Existing Housing with one 5-story building for seniors
PRA Activity Supportive Housing	Karibuni Place	72	11	8200 S. Ellis Ave in the Chatham community area; Existing Housing with 3-story building for working families and individuals who need supportive services
PRA Activity Supportive Housing	Los Vecinos Apartments	62	11	4250 W North Ave in the Humboldt Park community area; Existing Housing with 4-story building for formerly homeless individuals
PRA Activity Working Families	San Miguel Apartments	71	14	907 W Argyle Street in the Uptown community area; Existing Housing with 4-story building for working families
PRA Activity Working Families	Sunnyside Kenmore Apartments	26	2	Scattered Site in the Uptown community area; Existing Housing with two 3-story buildings for working families
PRA Activity Supportive Housing	Thresholds Humboldt Park & Kiley House	48	33	Scattered Site in the Humboldt Park and Kenwood community area; Existing Housing with one 4-story and one 3-story building for individuals with mental health/developmental disabilities
PRA Activity Working Families	Boulevard Apartments	70	12	Two sites: 929-35 N. Sacramento in the West Town Community Area. 2212-14 N. Sacramento in the Logal Square Community Area. Both existing 3-story brick walk-up buildings.
PRA Activity Senior Housing	G&A Senior Residence at Ravenswood	187	37	1818 W Peterson Ave in the West Ridge area, Existing Housing with 9-story building for seniors
Regional Housing Initiative	Woodstock Commons*	160	23	Scattered Site in Woodstock, IL; Existing Housing with eight 3-story buildings for working families

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PBVs under HAP Contracts through FY2011				
PBV Category	Site/Property	Total Number of Units at the Site	Number of PBVs Under HAP	Site Description
PRA Activity Working Families	Park Apartments	120	30	Scattered Sites in the Washington Park Community Area; Rehab of two 3-story buildings and two 4-story buildings for working families
PRA Activity Working Families	Ironwood Courts	46	14	3800-24 W. 16th Street in the North Lawndale Community Area; Rehab of a 3-story brick building for working families
PRA Activity Senior Housing	Nathalie Salmon House	62	4	Two sites: 7320 N. Sheridan in the East Rogers Park Community Area. This is a 5-story brick elevator building with 54 senior units. 4959 W. Medill is in the Belmont-Cragin Community Area. It is a 2-story brick walk-up.
PRA Activity Working Families	Reba Place Fellowship	67	8	1528 and 1545 W Pratt Blvd in Rogers Park community; Existing Housing consisting of two 4-story brick buildings for working families
PRA Activity Working Families	Howard Apartments	49	10	1569 N Hoyne Ave in West Town community; Existing Housing consisting of one 4-story building for working families
PRA Activity Working Families	St Edmund's Court	36	10	5921-39 S. Wabash in the Washington Park Community Area. Substantial Rehab of 3-story building for working families.
Regional Housing Initiative	Colonial Apartments*	240	60	748 Sharon Ave, in Park City, IL; New construction of a three-story building for Working Families, Senior, Person with Disability. AHAP Signed by Lake County Housing Authority
PRA Activity Supportive Housing for Families	Wrightwood Apartments	13	6	3821 W. Wrightwood in the Logan Square Community Area. 3-story building with supportive housing for families.
PRA Activity Supportive Housing for Families	Jarvis Apartments	26	8	2049-57 W. Jarvis in the Rogers Park Community Area. 3-story building with supportive housing for families.
PRA Activity Working Individuals	Bryn Mawr	231	10	5550 N. Kenmore in the Edgewater Community Area. This is a high-rise building that will have PRA SRO units.
PRA Activity Supportive Housing for Families	Sojourner Truth Apartments	24	20	103-115 E. 58th Street in the Washington Park Community Area; Existing 3-story walk-up building with supportive housing for families.
PRA Activity Working Families	Resurrection Homes	5	3	1910 S. Albany and 2124 W. 19th Street in the South Lawndale and Lower West Side Community Areas, respectively; Existing newly constructed two- and three-flat for working families.
Sub-Total: PBVs under HAP Contracts through FY2011		5752	2186	

*Woodstock Commons and Colonial Apartments are not located in Chicago and are not counted toward overall unit delivery progress.

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PBVs under HAP Contracts in FY2012				
PBV Category	Site/Property	Total Number of Units at the Site	Number of PBVs Under HAP	Site Description
PRA Activity Working Families	Nuestro Hogar	(total units previously counted)	1	Scattered Site in Humboldt Park community area. Existing Housing of a 4-story walk-up building for families
PRA Activity Working Families	SoJourney Truth Apartments	(total units previously counted)	3	103-115 E. 58th Street in the Washington Park Community Area; Existing 3-story walk-up building with supportive housing for families.
PRA Activity Senior Housing	Nathalie Salmon House	62	1	Two sites: 7320 N. Sheridan in the East Rogers Park Community Area. This is a 5-story brick elevator building with 54 senior units. 4959 W. Medill is in the Belmont-Cragin Community Area. It is a 2-story brick walk-up.
PRA Activity Working Families	Sunnyside Kenmore Apartments	(total units previously counted)	2	5353 W. Chicago Avenue in the Austin Community Area. New Construction of a 4-story building.
PRA Activity Supportive Housing	Bettendorf Place	(total units previously counted)	-1	8500 S. Sangamon in the South Chicago community area; Rehabilitation of an old convent into a studio building for homeless individuals with HIV/AIDS
PRA Activity Working Families	Greenwood Courts	(total units previously counted)	2	4431-37 S Greenwood Ave in the Kenwood community; Existing Housing of 4-story building for working families
PRA Activity Working Families	1531-39 W. 90th	10	4	1531-39 W 90th Street in the Washington Heights Community Area. 2-story building for working individual.
PRA Activity Supportive Housing	Los Vecinos Apartments	62	-1	4250 W North Ave in the Humboldt Park community area; Existing Housing with 4-story building for formerly homeless individuals
PRA Activity Working Families	The Resurrection Homes	5	2	1910 S. Albany and 2124 W. 19th Street in the South Lawndale and Lower West Side Community Areas, respectively; Existing newly constructed two- and three-flat for working families.
PRA Activity Working Families	Howard Apartments	49	2	1569 N Hoyne Ave in West Town community; Existing Housing consisting of one 4-story building for working families
PRA Activity Supportive Housing	Thresholds at Casa de Troy	16	12	Existing Housing located in Edgewater. The development will serve individuals in need of mental health services.
PRA Activity Supportive Housing	Thresholds at Edgewater Shores	73	5	Existing Housing located in Edgewater. The development will serve individuals in need of mental health services.
PRA Activity Working Families	Zapata Apartments	61	5	New construction of four buildings located in Logan Square within 1/4 mile of each other. The development will serve working families.
PRA Activity Supportive Housing	Boxelder Court	18	6	Substantial Rehabilitation building located in Woodlawn. The development will serve formerly homeless individuals with need of supportive services

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PBVs under HAP Contracts in FY2012				
PBV Category	Site/Property	Total Number of Units at the Site	Number of PBVs Under HAP	Site Description
PRA Activity Supportive Housing	5840 S Martin Luther King Dr	8	4	5838-5840 S Dr Martin Luther King Drive in the Washington Park Community Area. 3-story building for Grand Families who need supportive services
PRA Activity Supportive Housing	Los Vecinos Apartments	62	1	4250 W North Ave in the Humboldt Park community area; Existing Housing with 4-story building for formerly homeless individuals
PRA Activity Senior Housing	Hollywood House	197	1	5700 N Sheridan Road in the Edgewater Community Area; Rehabilitation of a 12-story Elevator building for seniors
PRA Activity Senior Housing	Hollywood House	(total units previously counted)	-1	5700 N Sheridan Road in the Edgewater Community Area; Rehabilitation of a 12-story Elevator building for seniors
PRA Activity Supportive Housing	Mt. Greenwood Estates	16	2	Existing Housing located in Mt. Greenwood. The development will serve individuals in need of mental health services.
PRA Activity Working Families	Laramie Courtyard Apartments	27	2	Existing Housing located in Belmont Cragin. The development will serve working individuals and small families.
Sub-Total: New PBVs under HAP Contract in FY2012		666	52	

PBVs under New HAP Contracts in FY2013				
PBV Category	Site/Property	Total Number of Units at the Site	Number of PBVs Under HAP	Site Description
PRA Activity Working Families	Zapata Apartments	(total units previously counted)	10	New construction of four buildings located in Logan Square within 1/4 mile of each other. The development will serve working families.
Regional Housing Initiative	North & Tallman	33	8	Three scattered sites located in the West Town Community Area. Substantial Rehabilitation of a 4-story building and New Construction of (3) two-flats.
PRA Activity Supportive Housing	Mt. Greenwood Estates	16	3	Existing Housing located in Mt. Greenwood. The development will serve individuals in need of mental health services.
PRA Activity Supportive Housing	Thresholds at Edgewater Shores	(total units previously counted)	3	Existing Housing located in Edgewater. The development will serve individuals in need of mental health services.
PRA Activity Supportive Housing	Thresholds at Casa de Troy	16	2	Existing Housing located in Edgewater. The development will serve individuals in need of mental health services.
PRA Activity Working Families	Sunnyside Kenmore Apartments	(total units previously counted)	2	5353 W. Chicago Avenue in the Austin Community Area. New Construction of a 4-story building.

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PBVs under New HAP Contracts in FY2013				
PBV Category	Site/Property	Total Number of Units at the Site	Number of PBVs Under HAP	Site Description
PRA Activity Supportive Housing	Illinois Accessible Housing- Phase 1	1559	15	Moderate Rehab to perform ADA retrofits to serve people with physical disabilities. 4 Buildings located in Lakeview, Hyde Park and Edgewater.
PRA Activity Working Families	Laramie Courtyard Apartments	(total units previously counted)	3	Existing Housing located in Belmont Cragin. The development will serve working individuals and small families.
PRA Activity Working Families	Laramie Courtyard Apartments	(total units previously counted)	-5	Existing Housing located in Belmont Cragin. The development will serve working individuals and small families.
PRA Activity Supportive Housing	Harvest Commons	89	89	1519 W. Warren Boulevard in the Near West Side Community Area. Historic façade preservation and Substantial Rehabilitation of the interior of a 6-story brick building that was constructed in the 1920's as a hotel.
PRA Activity Supportive Housing	Thresholds Humboldt Park & Kiley House	(total units previously counted)	1	Scattered Site in the Humboldt Park and Kenwood community area; Existing Housing with one 4-story and one 3-story building for individuals with mental health/developmental disabilities
PRA Activity Working Families	Princeton Park Apartments	908	7	Existing Housing located in Roseland. The development will serve working families.
PRA Activity Supportive Housing	New Moms Transformation Project	40	40	5353 W. Chicago Avenue in the Austin Community Area. New Construction of a 4-story building.
Sub-Total: New PBVs under HAP Contract in FY2013 as of September 2013		2661	178	

Additional PBVs Planned to be under New HAP Contracts in FY2013				
PBV Category	Site/Property	Total Number of Units at the Site	Number of PBVs Under HAP	Site Description
PRA Activity Working Families	Princeton Park Apartments	(total units previously counted)	30	Existing Housing located in Roseland. The development will serve working families.
PRA Activity Working Families	Zapata Apartments	(total units previously counted)	3	New construction of four buildings located in Logan Square within 1/4 mile of each other. The development will serve working families.
PRA Activity Supportive Housing	Illinois Accessible Housing- Phase 1	(total units previously counted)	5	Moderate Rehab to perform ADA retrofits to serve people with physical disabilities. 4 Buildings located in Lakeview, Hyde Park and Edgewater.
PRA Activity Working Families	Winterberry Place	21	6	Substantial Rehab located in Washington Park. The development will serve working families.

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Additional PBVs Planned to be under New HAP Contracts in FY2013				
PBV Category	Site/Property	Total Number of Units at the Site	Number of PBVs Under HAP	Site Description
PRA Activity Supportive Housing	Buffet Place	51	51	Substantial Rehab located in Lake View Area. The development will serve individuals in need of mental health services.
Sub-Total: Additional Planned New PBVs under HAP Contract October-December 2013		72	95	
Total: All Planned New PBVs under HAP in FY2013		2733	273	

Planned PBVs Under New HAP Contracts in FY2014				
PBV Category	Site/Property	Total Number of Units at the Site	Number of PBVs Under HAP	Site Description
PRA Activity Supportive Housing	Thresholds Humboldt Park & Kiley House	(total units previously counted)	6	Scattered Site in the Humboldt Park and Kenwood community area; Existing Housing with one 4-story and one 3-story building for individuals with mental health/developmental disabilities
PRA Activity Working Families	Sunnyside Kenmore Apartments	(total units previously counted)	4	5353 W. Chicago Avenue in the Austin Community Area. New Construction of a 4-story building.
PRA Activity Supportive Housing	Thresholds at Casa de Troy	(total units previously counted)	2	Existing Housing located in Edgewater. The development will serve individuals in need of mental health services.
PRA Activity Working Families	Princeton Park Apartments	(total units previously counted)	30	Existing Housing located in Roseland. The development will serve working families.
PRA Activity Supportive Housing	The Drex	12	12	Substantial Rehab in the Chatham area. The development will serve veteran individual/Families in need of supportive services.
PRA Activity Supportive Housing	Townhall Apartments	79	79	Substantial Rehab located in Lakeview. The development will serve individuals age 55 and older targeting the LGBT community.
PRA Activity Supportive Housing	Hope Manor II	73	73	New Construction in Englewood community. The development will serve veteran family in need of supportive services.
PRA Activity Supportive Housing	Illinois Accessible Housing- Phase 2	25	25	Acquisition of scattered condo units to be retrofitted for Physically Disabled individuals
PRA Activity Supportive Housing	937 W Cullom	11	4	Substantial Rehab located in Uptown community area. The development will serve individuals with disability and mental illness in need of supportive service

Planned PBVs Under New HAP Contracts in FY2014				
PBV Category	Site/Property	Total Number of Units at the Site	Number of PBVs Under HAP	Site Description
PRA Activity Supportive Housing	Lake Street Studios	61	61	New Construction in Auburn Gresham Community Area. The development will serve homeless individuals in need of supportive services.
Planned New PBVs under HAP Contract in FY2014		261	296	
OVERALL TOTAL: All Planned PBVs Under HAP Contract through FY2014		9412	2807	

Planned PBVs Under New AHAP Contracts in FY2014				
PBV Category	Site/Property	Total Number of Units at the Site	Number of PBVs AHAP	Site Description
PRA Activity Senior Housing	Mont Clare Senior	122	38	New Construction in Avalon Park Community Area. The development will serve Seniors.
PRA Activity Supportive Housing	Veterans New Beginnings	54	54	New Construction. The development will serve individuals veterans in need of supportive services.
Total PBVs under AHAP Contract in FY2014		176	92	

Leasing Information: Public Housing

Number of Public Housing Units to Be Leased in FY2014

In FY2014, CHA plans to lease a total of 17,937 MTW public housing units in its traditional family, scattered-site, senior-designated and mixed-income housing portfolios. This figure is based on CHA's target occupancy level of 98% throughout its housing portfolios and encompasses units turned over from existing leases as well as projected new leases. CHA does not have any non-MTW public housing units.

FY2014 Public Housing Leasing	
CHA Portfolio	Total Units
Family	4,617
Scattered Site	2,588
Senior	8,084
Mixed-Income/PII	2,648
Total	17,937

Anticipated Issues Related to Public Housing Leasing in FY2014

One barrier to leasing is finding applicants who can meet all of CHA's screening criteria and successfully pass eligibility requirements. For example, many applicants are unable to meet CHA's work requirement, so they are returned to the wait list until they can show compliance or exemption from the work requirement.

As outlined on p. 13, CHA has several categories of public housing units in its portfolio that are currently offline and unavailable for HUD-approved reasons. In coordination with HUD, CHA continues to prioritize reducing the number of offline units and making additional units available for occupancy as soon as possible. CHA also provides quarterly status updates directly to HUD and publicly through CHA's website. The following is a summary of CHA's long-term strategies to address offline units by category as of 3rd quarter 2013.

Units pending redevelopment/planning

A significant number of units are offline due to pending redevelopment plans, primarily at Lathrop Homes, Altgeld Gardens/Murray Homes and Frances Cabrini Rowhouses. While planning is underway for the redevelopment of these sites, the number of offline units in this category will not fluctuate significantly in FY2014. However, CHA is moving forward to expedite the finalization of plans to the extent possible given community planning processes and key stakeholder input.

Altgeld Gardens/Phillip Murray – 635 offline units

A comprehensive Master Planning process in FY2013 explored and analyzed the existing conditions, land uses, and community facilities in order to establish a revitalization model that will build upon CHA's existing capital improvement investments and develop a healthy, vibrant community. Upon completion of the Master Plan, implementation will be ongoing through FY2014.

Henry Horner Superblock – 92 offline units

The redevelopment of the Horner Superblock will transform 201 public housing units into a mixed income site. The current estimated unit mix includes approximately 90-95 public housing units. The final number will be negotiated in the Agreed Order.

- Construction Start: 3rd quarter 2014
- Unit Delivery: 2015

Frances Cabrini Rowhouses – 440 offline units

In FY2013, CHA completed a development zone plan with the assistance of the City of Chicago's Department of Housing and Economic Development, the Chicago Park District, the Chicago Department of Transportation and Chicago Public Schools, which proposes preferred land uses including housing, retail, open space and other uses as well as reintegration of the street grid. In FY2014, CHA will evaluate developer proposals received through this process. As part of the zone development process, CHA may submit in FY2014, a demolition/disposition application for all or some of the 440 non-rehabilitated units at Frances Cabrini Rowhouses. Depending on the timing of the application, some demolition may occur in FY2014.

- Present Final Development Zone Plan: October/November 2013
- Release Solicitation for Development Zone Proposal(s): 1st quarter 2014 (Phase 1)
- Construction Start: 1st quarter 2015 (Phase 1)
- Unit Delivery: 3rd quarter 2016 (Phase 1)

Lathrop Homes – 753 offline units

CHA remains committed to delivering 400 units of replacement family public housing units and retaining the 92 senior public units at the existing Lathrop Elderly (city/state project-based) property. The development is planned to be a combination of historically preserved housing, new housing, retail and other amenities on the former Julia C. Lathrop Homes property. CHA may submit in FY2014, a demolition/ disposition application for all or some of the 925 non-rehabilitated units at this site. Depending on the timing of the application, some demolition may occur in FY2014.

- Construction Start: 1st Quarter 2015 (Phase I, pending archeological survey results)
- Unit Delivery: 3rd Quarter 2016 (Phase I, pending archeological survey results)

Parkview/Fannie Emanuel – 181 offline units

CHA will act as master developer for the redevelopment of Parkview/Fannie Emanuel Senior Apartments to provide 100% low-income housing for seniors. . In October 2013, CHA submitted a portfolio application to HUD to utilize the Rental Assistance Demonstration (RAD) program for numerous sites, including Parkview/Fannie Emanuel. (Please refer to p. 18 for more information on CHA’s RAD application.)

- Construction Start: FY2014
- Unit Delivery: FY2016

Dorchester Artist Housing /Scattered Sites Southeast – 0 offline units

CHA closed the financial transaction for Dorchester Artist Housing on September 27, 2013 and construction began in October 2013. This innovative mixed-income development will feature an onsite art center and provide space for community art. The 36 offline scattered site units have been removed from the HUD PIC system.

- Construction Start: October 2013
- Unit Delivery: 4th Quarter 2014

Units undergoing capital maintenance

This category includes units held offline for ongoing and upcoming maintenance or extensive rehabilitation work across CHA’s portfolio. As part of CHA’s strategy to modernize, maintain and preserve its existing housing stock and ensure compliance with all regulatory and safety requirements, CHA is making strategic investments at several priority properties. These capital investments require that some units in occupied buildings be vacated for construction to occur; however, CHA has committed to holding only the minimum number of units offline for the duration of construction projects and resuming leasing as soon as feasible when units are completed. While CHA will hold only the minimum number of units offline for construction, major capital projects at larger sites consist of rolling rehabilitation of units and the number of offline units will fluctuate until all current residents in specific properties are housed in newly rehabilitated units.

In FY2014, a total of 14 major capital projects will continue or begin, with 6 of the 14 projects to be completed by mid-2014. Projects include ADA accessibility modifications, significant new life safety features (sprinklers, elevator controls and interior cameras), replacement of plumbing risers, kitchens and baths, and addressing water infiltration issues. The following is a summary of major capital projects for FY2014.

CHA Major FY2014 Capital Projects			
IL Number	Project/Site	Construction Start	Units Back Online/Available for Leasing
IL002084000	Judge Slater Apartments	May-12	February 2014
IL002067000	Patrick Sullivan Apartments	May-12	June 2014
IL002001000, IL002025000, IL002093000	ADA Projects (Brooks Homes, Lowden Homes, Horner- Westhaven)	Aug-13	May 2014

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IL002043000	Lidia Pucinska Apartments	Apr-13	January 2015
IL002066000	Long Life Apartments	May-13	July 2014
Various	General Renovation of Scattered Site Units	Sep-13	April 2014
IL002075000	Daniel Hudson Burnham Apartments	May-13	June 2014
IL002052000, IL002052100	Lincoln Perry Apartments/Annex	Oct-13	April 2015
IL002060000	Ella Flagg Apartments	Jun-13	December 2014
IL002086000	Major Lawrence Apartments	Jun-14	March 2016
IL002084000	Judge Slater Annex	Mar-14	November 2015
IL002076000	Caroline Hedger Apartments	Jun-14	March 2016
IL002078000	Minnie Riperton Apartments	Jun-14	March 2016
IL002057000	Judge Fisher Apartments	Jun-14	March 2016

Units pending demolition/disposition

Units in this category are pending HUD approval of demolition or disposition and will not come back online. As of 3rd quarter 2013, this category includes 41 units at the former ABLA Homes designated for the National Public Housing Museum.

Units used for non-dwelling purposes

In FY2014, CHA will continue to evaluate non-dwelling use of units across its portfolio in order to maximize the number of units available for residential use. From September 2012 through the 3rd quarter of 2013, CHA reduced the number of units used for non-dwelling purposes from 329 units to 269 units, an 18% reduction. CHA anticipates a small number of additional reductions in the number of units used for non-dwelling purposes in FY2014 to return units previously used for non-dwelling purposes in senior and family sites back online for leasing as appropriate.

HUD Changes to Public Housing Flat Rent Policies

The 2014 federal budget approved by Congress for HUD created a new rule for setting flat rents in public housing. The new rule states that flat rents must be no less than 80 percent of the fair market rent (FMR). The following table shows the new minimum flat rent level for CHA properties.

FY2014 HUD-required minimum new flat rents	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
80% of Chicago Fair Market Rents	\$582	\$661	\$784	\$999	\$1,164	\$1,339	\$1,514

Most CHA public housing residents (94%) select the income-based rent option and will not be impacted by this new HUD requirement. Approximately 1,000 CHA public housing households (6% of households) currently select the flat rent option. CHA posted information regarding the new flat rent policies on its website in May 2014, and residents who currently select the flat rent option were initially notified in June 2014 regarding the upcoming changes to flat rent based on the new HUD requirements.

Some CHA public housing residents who currently select the flat rent option may experience an increase in rent based on these changes. However, as outlined by HUD, increases in rent due to changes in flat rent cannot exceed 35% annually. Increases in rent that exceed 35% will be phased on over a 3-year period for affected residents.

CHA will continue to communicate with resident leadership and affected residents who select the flat rent option and to provide updates on implementation of this new policy. As required by HUD, CHA plans to implement the new flat rents with re-examinations beginning October 31, 2014.

Leasing Information: Housing Choice Voucher Program

Planned Number of Housing Choice Vouchers to Be Leased

CHA anticipates that 41,318 HCVs, including 38,315 MTW and 2,003 non-MTW HCVs, will be leased in FY2014. In FY2014, CHA plans to continue its efforts to maximize utilization of its voucher allocation with a goal of leasing 99.5% of available units. The following table shows projected HCV leasing by program type.

FY2014 Planned HCV Leasing Activity		
Voucher Type	Vouchers Allocated for Leasing	Planned Vouchers To Be Leased
MTW Leasing Vouchers	38,508	38,315
Non-MTW Vouchers		
Moderate Rehabilitation	1,277	1,271
VASH	685	682
Mainstream	50	50
Total Non-MTW	2,012	2,003
Total MTW/Non-MTW Leasing Vouchers	40,520	40,318

Anticipated Issues Related to HCV Leasing

In FY2014, CHA will conduct an in-depth analysis of the impact and effectiveness of CHA's mobility counseling program. In addition, a variety of strategies will continue to be in place to assist CHA in maximizing leasing such as the referral partnerships with Access Living, Illinois Department of Children and Family Services (DCFS) and Jesse Brown Veteran Affairs Medical Center.

Wait List Information: Public Housing and Housing Choice Voucher Program

Anticipated Changes to CHA Wait Lists

CHA conducted a Wait List Update from December 3, 2012 through January 18, 2013 (7 weeks). The following CHA wait lists were included: the Public Housing Family Housing (Community-Wide) Wait List, Scattered Site (Community Area) Wait Lists, and HCV/PRA Wait List. The update was completed with a survey that was available online or by telephone. An additional (6- week) grace period was offered from January 19, through February 28, 2013. As a result:

- CHA outreached to a total of 89,563 applicants by mail, phone, and e-mail to individuals on its Public Housing and Housing Choice Voucher Waitlists;
- As of March 2013, a total of 42,027 (47%) had completed the wait list update survey.
- A total of 47,536 (53%) applicants that did not respond to the survey were removed from the wait list following a final notification and provision of appeal process information.

Throughout 2013, prior to and after the updates were completed, approximately 2,000 households were housed from updated CHA waiting lists, approximately 100 households were added to the updated Scattered Site (Community Area) wait list, and approximately 8,000 households from updated waiting lists were contacted for screening but did not respond or did not qualify. As of 12/31/13, the updated wait lists have a total of 33,806 applicants as follows:

- Public Housing Family Housing (Community-Wide): 11,313
- Scattered Site (Community Area): 7,263
- HCV/PRA: 15,230

CHA will monitor and potentially open waitlists in public housing and HCV programs in FY2014 due to the FY2013 wait list update. CHA will continue to evaluate and identify gaps in underserved populations and expects that additional eligible families can be identified and apply through that process upon wait list opening.

Description of Public Housing Wait Lists

The following section describes CHA's public housing wait lists.

Family Housing (Community-Wide) Wait List

The Family Housing (Community-Wide) Wait List, currently contains adult applicants who are interested in units within CHA's city-wide traditional family portfolio. This wait list was last opened in FY2010 and is currently closed. CHA may open the Family Housing (Community Wide) Wait List in FY2014 due to the FY2013 wait list update and based on unit availability.

Scattered Site (Community Area) Wait Lists

The Scattered Site (Community Area) Wait Lists contain applicants interested in housing opportunities in CHA's scattered site portfolio. CHA has a wait list for each of the 77 community areas in the City of Chicago. In general, these wait lists are opened periodically (for approximately 15-30 days) in order to maintain an adequate list of applicants. In FY2014, CHA will continue to open various community-area wait lists throughout the year depending on current or expected vacancies and whether there are any depleted wait lists in those community areas.

Senior Site-Based Wait Lists

The Senior-Site Based Wait Lists are for applicants requesting studio and one-bedroom apartments in senior designated housing developments. There are currently no planned changes/updates to the senior site based wait lists in FY2014. CHA will continue to update the designation of each building in accordance with the 2010 Senior Designated Housing Plan which allows 1) buildings to be designated Reduced Age Buildings (55yrs and older to be housed) if any building has an occupancy level below 90% for six consecutive months, and 2) buildings to be

designated Traditional Buildings (62 yrs and older to be housed) if any Reduced Age Building reaches 98% occupancy for 12 consecutive months.

Description of HCV/PBV Wait List

CHA's HCV Wait List was last opened in FY2008 and is currently closed. CHA may open the HCV Wait List in FY2014 due to the FY2013 wait list update and based on subsidy availability. In FY2014, CHA plans to continue the screening of applicants on the HCV Wait List and, where eligible, offer an opportunity to be housed by becoming a participant in CHA's HCV Program. Applicants for the HCV Wait List are afforded the opportunity to concurrently select a preference for a PBV unit. Selecting the PBV application preference does not affect an applicant's place on the HCV Wait List, or exclude an applicant from receiving a tenant-based subsidy.

Non-MTW Related Housing Authority Information

Section III: Non-MTW Related Housing Authority Information (Optional)

This section contains information on planned sources and uses of non-MTW funds as well as planned non-MTW activities and programs in FY2014.

Planned Sources and Uses of Other HUD or Federal Funds

This is not applicable.

Description of Planned Non-MTW Activities in FY2014

CHA Redevelopment Activities

- In response to a Choice Neighborhoods or other Federal Notices of Funding Availability (NOFAs) released in FY2014, CHA may submit application(s) for grant funding for redevelopment.

Housing Choice Voucher Program Initiatives

HCV Participant Portal

In FY2012, CHA began development of the HCV Program Participant Portal, an interactive communication tool that will keep HCV participants connected with the HCV Program 24/7. HCV participants can access this portal online from a computer at home or in CHA's resource centers. Applicants will be able to get waitlist status and update contact information, while HCV participants will be able to process biennial re-examinations, interims, and moves. In addition, customers will access information on program news, new initiatives and educational workshops, and complete a customer service survey. CHA plans to fully implement portals in FY2014 in all of its regional offices.

CHA Owner and Participant Educational Workshops

At least quarterly, in FY2014, CHA's HCV Program will host an ongoing series of customer educational workshops. The focus of these workshops is to promote understanding between owners and participants in a series called *Building Bridges: Creating Lasting Owner/Tenant Relationships*. CHA has partnered with property management professionals and community tenant and owner organizations to develop these useful and informative workshops.

City of Chicago Retrofit Chicago Residential Partnership

In FY2014, CHA will continue partnering with the City of Chicago to modernize Chicago's housing infrastructure through the Retrofit Chicago Residential Partnership. The initiative provides a one-stop shop for owners of multi-family buildings with three or more units, to access free energy efficiency audits, rebates on new equipment, and low cost financing for other rebates. The Energy Savers Program will provide an energy assessment to help determine which measures can save money to operating cash flow. The Multi-Family Home Energy Savings Program provides free installation of energy savings measures in apartments such as low-flow showerheads, aerators, and compact fluorescent lamps (CFL's).

Chicagoland Apartment Association (CAA)

In FY2011, CHA began working with the CAA to provide educational opportunities for current HCV Owners to promote the HCV Program to the CAA membership to expand housing options in opportunity areas and to gain more knowledge from the private rental market best practices to guide policy and process. In FY2014, CHA will continue to offer trainings for CAA members and leasing agents of large multifamily properties located in opportunity areas, in order to expand housing choice for HCV participants.

HCV Owner Excellence Program

CHA launched the Owner Excellence Program (OEP) in September 2011 to recognize and reward outstanding property owners and/or property managers who participate in the HCV Program and to increase the number of high-quality HCV units leased in Chicago. Some of OEP's benefits include a designated team of "Owner Ambassadors" to

serve its members, a business center, preferred inspections scheduling and special events. Prior to August 1, 2013, participation in the Unit Excellence Program (UEP), which provides additional unit-based benefits, such as acceptance of passed inspections for new tenancy approvals, vacancy payments, and biennial inspection, was optional. CHA changed this policy by requiring all new OEP owners to have at least one (1) UEP unit in their portfolios. Existing OEP owners will have until August 1, 2014 to comply with this new requirement. Failure to comply will result in membership termination. Unit-based benefits will continue to be restricted to UEP units. In FY2014, CHA plans to continue to monitor and evaluate OEP and UEP activities.

HCV Owner Symposium

CHA will hold its 6th Annual Owner Symposium in FY2014. This annual activity provides a platform where property owners and managers throughout the City of Chicago can learn how to improve their business and advance their property management skills. Property owners and managers have the opportunity to attend breakout sessions on the topics of property management, evictions, inspections, rent determination, property renovation, lead based paint, property taxes, mold prevention, mortgages and fair housing. Through this venue, property owners and managers are able to learn about industry products and services through area vendors and share their knowledge through a number of networking opportunities.

Resident Services Program Initiatives

New Service Model

CHA is in the final stages of developing a new service model in line with Plan Forward: Communities that Work. The new model will provide services to more residents, including some HCV residents, and will better tailor services to need with a focus on adult education and employment, youth and clinical services. CHA will fully transition to the new model in FY2014, which includes:

- Allowing HCV residents to take advantage of certain education and workforce programs, including the agreement with the City Colleges of Chicago that allows residents to attend certificate and degree programs at no cost after financial aid, and Transitional Jobs and On-the-Job Training programs through workforce providers. This aspect of the new model was put in place in 2013.
- Tailored services that focus case coordination services and outreach on families who retain a Right of Return and those with at least one unemployed adult. Families in which all adults are working will still be able to access all services upon request, but unlike in the past they will only receive direct outreach if they have a lease violation or youth eligible to participate in programs.
- Like the previous model, the new model will continue to offer ongoing workforce development programs, youth programs and clinical/mental health services available to all public housing residents.

Long-term MTW Plan

Section IV: Long-Term MTW Plan (Optional)

This section describes potential activities that CHA will investigate and possibly implement beyond FY2014. CHA will continue to use the flexibilities afforded by the MTW Demonstration Program to not only meet the statutory objectives of the program, but also to use CHA's participation as a MTW agency as a platform to creatively achieve its goals.

Plan Forward: Communities that Work

On April 20, 2013, Mayor Rahm Emanuel and the Chicago Housing Authority released CHA's new strategic plan, *Plan Forward: Communities That Work*. The new strategic vision takes into account the need to fulfill existing commitments under the Plan for Transformation and the need to reconsider policies and programs to adjust to new economic realities and to use the platform of affordable housing to improve residents' lives and surrounding communities. As CHA implements Plan Forward, the agency will continue to pursue the three statutory objectives of the MTW Demonstration Program and to coordinate with HUD for review and approval as required.

In FY2014, CHA will finalize planning and begin implementation for the following key initiatives.

Rental Assistance Demonstration (RAD) Program

A key element of Plan Forward is to ensure that CHA's housing portfolio is safe, decent and sustainable. RAD is an important tool to ensure long-term operating efficiencies that will be a part of the implementation of Plan Forward. In October 2013, CHA submitted a portfolio application to HUD to utilize RAD for approximately 64 public housing properties with 10,935 units over the next two years (2014-2015). CHA plans to utilize RAD to refinance some properties and to support new initiatives that will expand affordable housing opportunities. More than 40 stakeholder, resident and community meetings were held prior to the application to educate people about the benefits of RAD and how it can be used to support long-term affordability.

After the RAD portfolio application was submitted, CHA learned that the 60,000 unit maximum currently available for RAD had already been reached through applications received by HUD. However, CHA has continued the internal planning process for RAD in the event that the number of units available for the program is increased, or if any of the earlier applications do not move forward. In anticipation of a potential RAD award in FY2014, CHA is proceeding with including the required revisions to the annual plan as detailed in Section II and in the Appendices.

Uniform Housing Policy

Like most housing authorities, CHA administers two primary housing subsidy programs: the Public Housing and Housing Choice Voucher programs. While the programs are similar in several key aspects, the specific policies have evolved over time and differ in areas that lead to administrative inefficiencies and participant confusion. Another element of Plan Forward is to address these issues by creating a Uniform Housing Policy to establish a more consistent set of rules for all CHA-assisted housing. The Uniform Housing Policy will align housing policies to streamline and clarify program administration. It will unify the rules for the two housing programs to make them more user-friendly and efficient to manage by having a single set of requirements, standards, and processes. CHA will implement the Uniform Housing Policy through a multi-phased approach. This implementation strategy will prioritize policies that benefit participants and enhance consistency across programs in FY2014. New policies that require more discussion and analysis will be adopted in subsequent years.

Beginning in FY2014, CHA plans to move forward with several policies that require MTW authority, including expanding biennial recertification to public housing, adopting triennial recertification for households with only senior/disabled participants, simplifying asset verification, and modifying "Choose to Own" homeownership and Family Self Sufficiency program requirements. These activities are also described in *Section V: Proposed MTW*

Activities. In addition, CHA plans to implement additional policies related to HCV unit inspection owner participation, clarification of waitlist priorities and income requirements across housing programs, clarification of definitions of absent participants, guests and unauthorized members, standardization of utility allowance schedules and adoption of smoke-free housing policies for all new properties. CHA will release Uniform Housing Policy documents for public housing and HCV programs for public comment and HUD approval in order to implement these policies in FY2014.

Housing Subsidy to support local preferences

As part of Plan Forward, CHA has explored alternative housing programs, including a locally-administered step-down subsidy program, to support local initiatives and needs. After careful consideration, CHA has determined it will not pursue this type of program. However CHA continues to explore strategies and program parameters that will contribute to Chicago's Plan to End Homelessness 2.0, HUD's Designated Opportunities to End Homelessness and other local initiatives. To support these initiatives, CHA initially proposed a local, non-traditional Sponsor-Based Voucher Program as an MTW activity in the version of this amendment that was released for public comment. CHA has determined it will instead explore the implementation of a Sponsor-Based Voucher Program utilizing project-based vouchers. CHA is not requesting MTW flexibility to potentially implement this program as a project-based voucher program.

CHA Five-Year Capital Plan

THE CHICAGO HOUSING AUTHORITY 5-YEAR CAPITAL PLAN					
	2014	2015	2016	2017	2018
	Budget	Budget	Budget	Budget	Budget
Redevelopment/Acquisition					
Real Estate Acquisition Program/REAP	\$28,000,000	\$44,000,000	\$20,000,000	\$20,000,000	\$20,000,000
Mixed Income/Mixed-Finance	\$55,606,139	\$78,551,840	\$101,157,020	\$96,939,780	\$71,072,300
Other	\$14,581,750	\$16,881,750	\$1,331,750	\$1,581,750	\$0
Total Redevelopment/Acquisition Budget	\$98,187,889	\$139,433,590	\$122,488,770	\$118,521,530	\$91,072,300
Capital Maintenance/Construction Projects					
Family	\$63,165,570	\$21,248,003	\$16,400,607	\$13,632,552	\$14,823,096
Senior	\$99,606,627	\$95,981,997	\$73,711,610	\$54,881,308	\$62,980,248
Scattered Sites	\$22,435,643	\$14,130,805	\$14,000,000	\$14,000,000	\$14,000,000
Other	\$13,951,194	\$17,519,355	\$13,034,974	\$14,861,513	\$14,075,916
CCD Total Capital Budget	\$199,159,034	\$148,880,160	\$117,147,191	\$97,375,373	\$105,879,260
Capital Main/Administrative/Debt Service	\$29,097,834	\$19,537,244	\$19,525,466	\$19,505,341	\$19,483,533
Total Capital Budget	<u>\$326,444,757</u>	<u>\$307,850,994</u>	<u>\$259,161,427</u>	<u>\$235,402,244</u>	<u>\$216,435,093</u>
Sources of Funds					
Capital Fund Program:					
Current Year Capital Funds	\$74,036,298	\$68,853,757	\$64,033,994	\$59,551,615	\$55,383,002
Prior Year Capital Funds	\$63,782,294	\$37,758,512	\$35,115,416	\$32,657,337	\$30,371,323
HOPE VI Grants:					
HOPE VI Revitalization	\$9,208,500	\$1,000,000	-	-	-
MTW Fund Requirement:					
MTW Block Grant	\$179,417,665	\$200,238,725	\$160,012,017	\$143,193,292	\$130,680,768
Total Sources	<u>\$326,444,757</u>	<u>\$307,850,994</u>	<u>\$259,161,427</u>	<u>\$235,402,244</u>	<u>\$216,435,093</u>

Conversion of CHA Mod-Rehab Program Units

CHA will continue assessing the privately-owned properties in the Moderate-Rehabilitation program to identify opportunities and strategies for possible conversion to projected-based voucher units through RAD or the PRA program or preservation under other housing programs. These properties provide 1,276 units of low-income housing across the city of Chicago that are not included in the unit delivery count numbers in the Plan for Transformation.

Proposed MTW Activities

Section V: Proposed MTW Activities - HUD Approval Requested

This section contains information on proposed FY2014 MTW activities for which CHA is seeking HUD approval. In FY2014, CHA plans to implement the below five proposed MTW activities pending HUD approval.

Public Housing and HCV Programs/Uniform Housing Policy (UHP) MTW Activities

As a major Plan Forward initiative, CHA is creating a Uniform Housing Policy to establish a more consistent set of rules for all CHA-assisted housing. The Uniform Housing Policy will align housing policies and establish a single set of requirements, standards, and processes to streamline administration across public housing and HCV programs. CHA will implement the Uniform Housing Policy through a multi-phased approach, beginning with prioritizing policies that benefit participants and enhance consistency across programs in FY2014. CHA is seeking approval to move forward with several proposed policies that require MTW authority, which are described in the following section. As CHA works to finalize components of a Uniform Housing Policy, it will develop evaluation strategies for these proposed and any future related MTW activities.

Biennial Re-examinations for HCV and Public Housing

- **Description and Impact:** CHA proposes to expand biennial re-examinations to public housing participants, in place of the current practice of conducting annual re-examinations for applicable participants. CHA currently conducts biennial re-examinations for HCV Program participants to review family circumstances, income, assets, expenses, and family composition to establish continued eligibility for the HCV Program. Biennial re-examinations will be applicable for those public housing and HCV households who are not on annual or triennial re-examination schedules.³ The impact of this activity is consistency across programs as well as a decrease in staff time and resources currently utilized for conducting annual re-examinations for applicable families. In addition, this activity will decrease the re-examination burden for participants who will undergo re-examinations on a biennial basis instead of an annual basis.
- **Implementation Year:** FY2006 (HCV), proposed FY2014 (Public Housing)
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Impact Analysis (for public housing):** For this impact analysis, CHA took the average number of annual re-examinations in public housing for households that are eligible for biennial re-examinations. CHA will reduce annual re-examinations for this population from approximately 8,671 annual re-examinations to approximately 4,335 re-examinations each year based on a biennial schedule. CHA estimates that each re-examination takes approximately 3.5 hours and costs approximately \$75. Therefore, CHA anticipates saving \$325,125 (4,335 re-exams x \$75) and 15,176 staff and participant hours (4,335 re-exams x 3.5 hours) by moving from annual to biennial re-examinations for applicable public housing participants.

Overall, this policy will have a positive impact for public housing families considered eligible for biennial re-examinations. These households will have a reduced re-examination burden and will be able to retain any income increases for a longer period of time without their rent calculation being adjusted.

- **Hardship Policy:** If for any reason a participant's income decreases, they will be eligible for an interim re-examination to adjust their rent calculation based on a decrease in income.
- **Implementation Plan:** All public housing participants will be required to undergo an annual re-examination during FY2014. During FY2014 public housing re-examinations, households will be placed on a biennial re-examination schedule.

³ CHA conducts annual re-examinations for public housing and HCV households participating in the FSS and Choose to Own programs and households in Moderate Rehab properties. CHA is proposing triennial re-examinations for fixed-income households with only elderly and/or disabled participants.

- Standard Metrics:

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
CE-1: Agency Cost Savings	Total cost of task (in dollars).	<p><u>Public Housing:</u> In FY2011 and FY2012, annual re-examinations for applicable PH participants cost approximately \$650,325 (8,671 re-examinations x \$75).</p> <p><u>HCV:</u> For FY2011 and FY2012, based on an annual re-examination schedule, re-examinations for applicable HCV participants would cost approximately \$1,289,400 (17,192 re-examinations x \$75).</p>	<p><u>Public Housing:</u> Cost savings will not be realized until FY2015 based on the implementation schedule.</p> <p><u>HCV:</u> Biennial re-exams for applicable HCV participants will cost \$644,700 (8,596 re-exams x \$75) in FY2014.</p>
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	<p><u>Public Housing</u> In FY2011 and FY2012, CHA spent 30,348 staff hours on annual re-exams for applicable PH participants (8,671 re-examinations x 3.5 hours).</p> <p><u>HCV:</u> In FY2011 and FY2012, based on an annual re-examination schedule, CHA would have spent 60,172 staff hours on re-examinations for applicable HCV participants (17,192 re-examinations x 3.5 hours)</p>	<p><u>Public Housing:</u> Cost savings will not be realized until FY2015 based on the implementation schedule.</p> <p><u>HCV:</u> CHA will spend 30,086 staff hours on biennial re-exams (8,596 re-exams x 3.5 hours) in FY2014.</p>
CE-5: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<p><u>Public Housing:</u> In FY2013, public housing households eligible for biennial re-examinations contributed a total of \$65,718,276 (17,942 households).</p> <p><u>HCV:</u> In FY2013, HCV households who had re-examinations, based on a biennial schedule, contributed a total of \$62,331,084 (18,034 households).</p>	<p><u>Public Housing:</u> The total contribution of public housing households eligible for biennial re-examinations will remain stable at \$66,000,000 in FY2014.</p> <p><u>HCV:</u> The total contribution of HCV households eligible for biennial re-examinations will remain stable at \$62,000,000 in FY2014.</p>

SS-1: Increase in Household Income*	Average earned income of households affected by this policy in dollars (increase).	<p><u>Public Housing:</u> In FY2013, the average income from wages for 17,942 public housing household eligible for biennial re-examinations was \$4,104.</p> <p><u>HCV:</u> In FY2013, the average income from wages for 18,034 HCV households who had biennial re-examinations was \$4,208.</p>	<p><u>Public Housing:</u> Average income from wages for public housing household eligible for biennial re-examinations will remain stable at \$4,000 in FY2014.</p> <p><u>HCV:</u> Average income from wages for HCV household eligible for biennial re-examinations will remain stable at \$4,000 in FY2014.</p>
SS-3: Increase in Positive Outcomes in Employment Status*	Other category: Having earned income.	<p><u>Public Housing:</u> In FY2013, 3,080 “workable” public housing heads of household eligible for biennial re-examinations had income from wages.</p> <p><u>HCV:</u> In FY2013, 3,478 “workable” HCV heads of household eligible for biennial re-examinations had income from wages.</p>	<p><u>Public Housing:</u> The number of “workable” public housing heads of household eligible for biennial re-examinations with income from wages will remain stable at 3,000 in FY2014.</p> <p><u>HCV:</u> The number of “workable” HCV heads of household eligible for biennial re-examinations with income from wages will remain stable at 3,400 in FY2014.</p>
		<p><u>Public Housing:</u> In FY2013, 59% of “workable” public housing heads of household eligible for biennial re-examinations had income from wages.</p> <p><u>HCV:</u> In FY2013, 45% of “workable” HCV heads of household eligible for biennial re-examinations had income from wages in FY2013.</p>	<p><u>Public Housing:</u> The percent of “workable” public housing heads of household eligible for biennial re-examinations with income from wages will remain stable at 59% in FY2014.</p> <p><u>HCV:</u> The percent of “workable” HCV heads of household eligible for biennial re-examinations with income from wages will remain stable at 45% in FY2014.</p>

<p>SS-4: Households Removed from Temporary Assistance for Needy Families (TANF)</p>	<p>Number of households receiving TANF assistance (decrease).</p>	<p><u>Public Housing:</u> In FY2013, 6,420 public housing households (out of 17,942) eligible for biennial re-examinations were receiving TANF.</p> <p><u>HCV:</u> In FY2013, 1,538 HCV households (out of 18,034) who had biennial re-examinations were receiving TANF.</p>	<p><u>Public Housing:</u> In FY2014, the number of public housing households eligible for biennial re-examinations who receive TANF will remain stable at 6,400.</p> <p><u>HCV:</u> In FY2014, the number of HCV households eligible for biennial re-examinations who receive TANF will remain stable at 1,500.</p>
<p>SS-8: Households Transitioned to Self-Sufficiency**</p>	<p>Number of households transitioned to self-sufficiency (increase).</p>	<p><u>Public Housing:</u> In FY2013, 1,082 public housing households (out of 17,942) eligible for biennial re-examinations moved up at least one AMI category.</p> <p><u>HCV:</u> In FY2013, 1,374 HCV households (out of 18,034) who had biennial re-examinations moved up at least one AMI category.</p>	<p><u>Public Housing:</u> 1,000 public housing households eligible for biennial re-examinations will move up at least one AMI category in FY2014.</p> <p><u>HCV:</u> 1,300 HCV households eligible for biennial re-examinations will move up at least one AMI category in FY2014.</p>
<p>*For SS-3 tracking, CHA defines "work-able residents" as those age 18 to 54 who are not receiving SSI, SSDI or a pension. CHA defines "employed" based on whether income from wages is recorded in Yardi, CHA's system of record.</p> <p>**For SS-8 tracking, CHA is establishing the movement up to a higher Area Median Income (AMI) category as a definition of self-sufficiency. CHA tracks the following AMI categories: Thriving (above 80% AMI), Stable (51-80% AMI), Safe (31-50% AMI with at least one employed household member), At Risk (0-30% AMI with at least one employed household member) and Crisis (0-50% AMI with zero employed work-able adults in household).</p>			

- **Data Collection:** CHA will track the staff time and cost savings for biennial re-examinations. Current FY2014 estimates are based on a previous time/cost study for HCV biennial re-examinations. However, both public housing and HCV anticipate conducting time studies/cost analyses for re-examinations by the end of FY2014. The HCV analyses will reflect updates associated with new contracts for administration of the HCV program (expected to be executed by 2nd quarter of FY2014). CHA will itemize costs (direct and indirect) of a random sample population and track costs associated with re-examinations. Itemized costs to be reviewed include but may not be limited to operating expenses, staffing, training, and quality control activities.

In addition, CHA will track the following metrics for households eligible for biennial re-examinations: resident contribution toward rent, average income from wages and employment status (defined as "having earned income") for "work-able" heads of household, households who receive TANF assistance, and those who move up to a higher AMI category as described above.

- **Authorization:** For HCV, Attachment C, Section D (1) (c) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of Section 8(o) (5) of the 1937 Act and 24 C.F.R. 982.516. For public housing Attachment C, Section C (4) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of sections 3(a)(1) and 3(a)(2) of the 1937 Act and 24 C.F.R 966.4 and 960.257.

Triennial Re-examinations for Households with Only Elderly/Disabled Participants for HCV and Public Housing

- **Description and Impact:** CHA proposes to implement a streamlined triennial re-examination schedule for public housing and HCV fixed income households⁴ consisting of only elderly and/or disabled participants. Given the infrequency of income changes for these households, the impact of this activity is decreased staff time and resources currently utilized for conducting re-examinations for this population. In addition, this activity will decrease the re-examination burden for fixed income elderly/disabled households.
- **Implementation Year:** proposed FY2014 (HCV and Public Housing)
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Impact Analysis:** By conducting triennial re-examinations for fixed income households consisting of only elderly/disabled participants in the HCV program, CHA will reduce re-examinations for this population from approximately 3,926 re-examinations (assuming an annual re-exam schedule) to approximately 1,295 re-examinations. For public housing fixed income households consisting of only elderly/disabled participants, this policy will reduce re-examinations for this population from approximately 3,971 annual re-examinations, to approximately 1,310 re-examinations on a yearly basis.

CHA estimates that each re-examination takes approximately 3.5 hours and costs \$75 to conduct. Currently, CHA would spend approximately 13,741 hours and \$294,450 on re-examinations for the HCV fixed income households consisting of only elderly/disabled participants (assuming an annual re-examination schedule). Under a triennial re-examination policy, CHA would spend 4,532 hours and \$97,125 on re-examinations for this HCV population. Currently for public housing, CHA spends approximately 13,899 hours and \$297,825 on annual re-examinations for the fixed income households consisting of only elderly/disabled participants. Under a triennial re-examination policy, CHA would spend 4,585 hours and \$98,250 on re-examinations for this public housing population.

Overall, this policy will have a positive impact for public housing and HCV fixed income households consisting of only elderly/disabled participants. Eligible households will have a reduced re-examination burden and will be able to retain any income increases for a longer period of time without their rent calculation being adjusted.

- **Hardship Policy:** If for any reason a participant's fixed-income decreases, they will be eligible for an interim re-examination to adjust their rent calculation based on a decrease in income.
- **Implementation Plan:** Currently, HCV participants are on a biennial re-examination schedule. For any participant who last had a re-examination in FY2012, and is eligible for a triennial re-examination schedule, their next re-examination will be in FY2015. For any participant who last had a re-examination in FY2013, and is eligible for a triennial re-examination schedule, their next re-examination will be in FY2016. For any participant who has a re-examination in FY2014, and is eligible for a triennial re-examination schedule, their next re-examination after FY2014 will be in FY2017.

All public housing participants will be required to undergo an annual re-examination during FY2014. During FY2014 public housing re-examinations, eligible households will be placed on a triennial re-examination schedule.

- **Standard Metrics:**

⁴ Based on HUD PIH Notice 2013-03, fixed-income is defined as: 1) Social Security payments to include Supplemental Security Income (SSI) and Supplemental Security Disability Insurance (SSDI); 2) Federal, State, local, and private pension plans; and 3) Other periodic payments received from annuities, insurance policies, retirement funds, disability or death benefits, and other similar types of periodic receipts that are of substantially the same amounts from year to year.

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
CE-1: Agency Cost Savings	Total cost of task (in dollars).	<p><u>Public Housing:</u> In FY2013, CHA will spend \$297,825 on annual re-exams for fixed-income elderly/disabled families (3,971 re-exams x \$75).</p> <p><u>HCV:</u> In FY2013, based on an annual schedule, CHA would spend \$294,450 on re-exams for fixed-income elderly/disabled families (3,926 x \$75).</p>	<p><u>Public Housing:</u> Cost savings will not be realized until FY2015 based on the implementation schedule.</p> <p><u>HCV:</u> CHA will spend \$97,125 on HCV triennial re-exams (1,295 re-exams x \$75) in FY2014, based on transitioning applicable families from a biennial schedule.</p>
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	<p><u>Public Housing:</u> In FY2013, CHA will spend 13,898 staff hours on annual re-exams for public housing fixed-income disabled/elderly families (3,971 re-exams x 3.5 hours).</p> <p><u>HCV:</u> In FY2013, based on an annual re-examination schedule, CHA would spend 13,741 staff hours on annual re-exams for HCV fixed-income disabled/elderly families (3,926 re-exams x 3.5 hours).</p>	<p><u>Public Housing:</u> Cost savings will not be realized until FY2015 based on the implementation schedule.</p> <p><u>HCV:</u> CHA will spend approximately \$97,125 on HCV triennial re-exams (1,295 re-exams x \$75) in FY2014, based on transitioning applicable families from a biennial schedule.</p>
CE-5: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<p><u>Public Housing:</u> In FY2013, public housing fixed-income elderly/disabled families contributed a total of \$12,117,612 (3,541 households).</p> <p><u>HCV:</u> In FY2013, HCV fixed-income elderly/disabled families contributed a total of \$14,740,776 (4,701 households).</p>	<p><u>Public Housing:</u> The total contribution of public housing fixed-income elderly/disabled families will remain stable at \$12,200,000 (3,500 households) in FY2014.</p> <p><u>HCV:</u> The total contribution of HCV fixed-income elderly/disabled families will remain stable at \$14,800,000 (4,700 households) in FY2014.</p>

- Data Collection: CHA will track the staff time and cost savings for triennial re-examinations. Current FY2014 estimates are based on a previous time/cost study for HCV biennial re-examinations. However, both public housing and HCV anticipate conducting time studies/cost analyses for re-examinations by the end of

FY2014. The HCV analyses will reflect updates associated with new contracts for administration of the HCV program (expected to be executed by 2nd quarter of FY2014). CHA will itemize costs (direct and indirect) of a random sample population and track costs associated with re-examinations. Itemized costs to be reviewed include but may not be limited to operating expenses, staffing, training, and quality control activities.

In addition, CHA will track resident contribution toward rent for households eligible for triennial re-examinations.

- **Authorization:** For public housing, Attachment C, Section C (4) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of sections 3(a)(1) and 3(a)(2) of the 1937 Act and 24 C.F.R 966.4 and 960.257. For HCV, Attachment C, Section D (1)(c) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of Section 8 (o)(5) of the 1937 Act and 24 CFR 982.516.

Elimination of Assets in Income Calculation After Initial Eligibility for HCV and Public Housing

- **Description and Impact:** CHA proposes to expand this activity to public housing. For public housing and HCV, assets will only be calculated for initial eligibility and income from assets will only be included in the initial rent calculation. CHA's HCV Program is currently authorized to no longer include income earned from assets as part of income calculations for participants after initial admission. CHA wants to achieve administrative efficiency and administrative cost savings by eliminating the need to calculate assets at re-examinations across both programs. Currently, these asset calculations have minimal impact on overall rent calculation and tenant portion in both public housing and HCV programs. The impact of this activity is a reduction in staff resources and costs associated with verifying assets after initial admission.
- **Implementation Year:** FY2011 (full implementation for HCV), proposed FY2014 (Public Housing)
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Impact Analysis (for public housing):** Approximately 34% of public housing households reported assets at the end of FY2012. Of these 6,058 public housing households with assets, only 14% (821) of the households anticipated income from their assets. Of those 821 public housing households anticipating income from assets, 90% (739) anticipate less than \$100 annually from these assets. Since income from assets is small, eliminating asset calculations after initial eligibility will have a minimal impact on rent calculation for these households.

CHA estimates that calculating assets takes roughly 20 minutes (.34 hours) during an examination for a cost of approximately \$15 per examination. In FY2012, CHA calculated assets 9,695 times for public housing households, for all examination types. For these 9,695 asset calculations, CHA spent approximately 3,296 hours (.34 x 9,695) and \$145,425 (\$15 x 9,695) calculating assets for public housing households.

Overall the elimination of assets after initial eligibility has minimal impact on households in both public housing and HCV programs. At the end of FY2012, there were 7,786 households with assets across programs, including the 6,058 public housing households. Of all households across both programs with assets, only 13% (979) anticipated income from their assets and, of these, 88% (866) anticipate less than \$100 annually from these assets. In addition, CHA will reduce administrative costs by eliminating the asset calculation after the initial eligibility for both programs, and participants will get the benefit of having income from assets omitted in future rent calculations.

- **Hardship Policy:** If a participant loses income from assets in between an initial examination and a re-examination, the participant may request an interim re-examination to adjust their rent calculation.
- **Implementation Plan:** HCV has implemented this policy since FY2011. Public housing will begin implementation of this policy in FY2014.

- Standard Metrics:

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
CE-1: Agency Cost Savings	Total cost of task (in dollars).	<p><u>Public Housing:</u> In FY2012, asset calculations for all examination types for public housing cost \$145,425 (\$15 x 9,695 asset calculations).</p> <p><u>HCV:</u> In FY2010, asset calculations for all examination types for HCV cost \$256,470 (\$15 x 17,098 asset calculations).</p>	<p><u>Public Housing:</u> Once this policy is implemented in FY2014, CHA will track cost savings for this activity.</p> <p><u>HCV:</u> In FY2014, CHA will spend \$8,850 calculating assets only at admission (\$15 x 590 asset calculations). 590 asset calculations are projected based on the number of new HCV admissions in FY2012 with assets (590).</p>
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	<p><u>Public Housing:</u> In FY2012, CHA spent 3,296 staff hours on asset calculations for all examination types for public housing (.34 hours x 9,695 asset calculations).</p> <p><u>HCV:</u> In FY2010, CHA spent 5,813 staff hours on asset calculations for all examination types for HCV (.34 hours x 17,098 asset calculations).</p>	<p><u>Public Housing:</u> Once this policy is implemented in FY2014, CHA will track cost savings for this activity.</p> <p><u>HCV:</u> In FY2014, CHA will spend 201 staff hours calculating assets only at admission (.34 hours x 590 asset calculations). 590 asset calculations are projected based on the number of new HCV admissions in FY2012 with assets (590).</p>

- Data Collection: CHA will track the staff time and cost savings for elimination of assets in income calculations after initial eligibility.
- Authorization: For HCV, Attachment C, Section D (2)(a) and Attachment C, Section D, (3)(b) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of 24 C.F.R. 982.516 and 24 C.F.R. 982.518. For public housing, Attachment C, Section C(11) which waives 24 C.F.R. 5.603.

Choose to Own Home Ownership Program for HCV and Public Housing Participants - Modify Income Eligibility Requirements (previously Comprehensive Low-Income Home Ownership Program)

- **Description and Impact:** CHA proposes to institute a higher minimum income requirement for eligibility for the Choose to Own Homeownership Program. Rather than the current minimum income of \$14,500, the new eligibility requirement will be 50% or more of the Area Median Income (AMI). The overall goal is to help ensure that those who participate in the Choose to Own program successfully transition to self-sufficiency once their subsidy period is over. Specifically, this activity addresses the issue that some program participants will not be able to assume their full mortgage when their 15-year subsidy period ends, putting them at risk of foreclosure. Upon approval, the new minimum income requirement will take effect immediately for new enrollees. It would not apply to those currently in the program preparing to purchase a home. This change will also not apply to those who are elderly or disabled who enroll in the program.

In FY2011, CHA expanded the Choose to Own (CTO) Home Ownership Program beyond HCV participants to current CHA public housing residents. Public housing residents who meet program criteria are now also eligible to participate in the CTO program in addition to current HCV participants. Participants of this program receive a subsidy to be used toward the payment of their monthly mortgage obligation. Pre- and post-home ownership education and counseling requirements are an integral component to remain an eligible participant. The proposed new requirements will be applicable to all new HCV and public housing program enrollees.

The overall impact of the Choose to Own program is to increase self-sufficiency and expand housing options through opportunities for home ownership.

- **Implementation Year:** FY2011 (expansion to public housing), proposed FY2014 (new income eligibility requirement)
- **Statutory Objectives:**
 - MTW Statutory Objective I: Increase housing choices for low-income families.
 - MTW Statutory Objective II: Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
SS-5: Households Assisted by Services that Increase Self-Sufficiency	Number of households receiving services aimed to increase self-sufficiency (increase).	0 families enrolled under new income requirements.	25 families enroll under new income requirements in FY2014.
SS-8: Households Transitioned to Self-Sufficiency*	Number of households transitioned to self-sufficiency (increase).	26 families (23 HCV and 3 public housing) purchased a home in FY2012.	30 families (25 HCV and 5 public housing) purchase homes in FY2014.
HC-6: Increase in Homeownership Opportunities	Number of households that purchased a home as a result of the activity (increase).	26 families (23 HCV and 3 public housing) purchased a home in FY2012.	30 families (25 HCV and 5 public housing) purchase homes in FY2014.
*For the SS-8 standard metric tracking, CHA is establishing the purchase of a home through Choose to Own as a definition of self-sufficiency.			

- **Data Collection:** CHA tracks program enrollment and the number of homes purchased by both public housing residents and HCV Program participants.
- **Authorization:** Attachment C, Section B, Paragraph 1(b)(iii), and Attachment C, Section D, Paragraph 8 (a-b) of CHA’s Amended and Restated MTW Agreement, which waives certain provisions of Sections 8 (o)(15) and 8(y) of the 1937 Act and 24 C.F.R 982.625 through 982.643.

Family Self Sufficiency Program for HCV and Public Housing Participants - Modify Program Requirements

- **Description and Impact:** CHA proposes to revise the participation requirements for the Family Self-Sufficiency program for public housing and HCV participants in the following ways:
 - Eliminate the Earned-Income Disregard for FSS participants so that they begin earning escrow more quickly.
 - Terminate participants from the FSS program who are not engaged with the program to open slots for those who are more interested in taking advantage of it. (This will not affect their housing subsidy.) Engagement will be defined as having at least one face-to-face meeting with an FSS coordinator each year.
 - Create more stringent education requirements for program participants, including attending three financial literacy sessions each year.
 - Require participants to be continuously employed for at least 12 months prior to program completion.

These revisions will remedy several current issues, including existing disincentives to participation due to a short period of time in which to earn escrow, underutilization of the program by participants who are not fully interested in engaging, and lack of financial self-sufficiency of current graduates. The overall goal is to maximize participation in the FSS program and maximize the benefits of participation for those enrolled in the program. The impact of this activity is that more participants will remain engaged, obtain escrow, and increase consistent employment so they are better prepared for economic self-sufficiency upon graduation. Upon approval, the new policies will take effect immediately for new enrollees and optionally for current participants.
- **Implementation Year:** proposed FY2014
- **Statutory Objective:** MTW Statutory Objective II: Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
SS-1: Increase in Household Income	Average earned income of households affected by this policy in dollars (increase).	In FY2013, the average income from wages among FSS participants was \$8,855 (742 participants).	The average income from wages among FSS participants will remain stable at \$8,800 (1,050 projected participants) in FY2014.
SS-2: Increase in Household Savings	Average amount of savings/escrow of households affected by this policy in dollars (increase).	In FY2013, FSS participants had an average escrow of \$2,819 (742 participants).	In FY2014, the average escrow per FSS participant will remain stable at \$2,800.

Section V: Proposed MTW Activities

SS-3: Increase in Positive Outcomes in Employment Status*	Other category defined as: Having earned income.	In FY2013, 344 FSS participants had income from wages.	The number of FSS participants with income from wages is projected as 483 participants in FY2014, which remains stable at 46%.
		In FY2013, 46% of FSS participants had income from wages.	The percent of FSS participants with income from wages will remain stable at 46% in FY2014.
SS-4: Households Removed from TANF	Number of households receiving TANF assistance (decrease).	In FY2013, 133 FSS participants were receiving TANF.	In FY2014, the number of FSS participants receiving TANF will remain stable at 130.
SS-5: Households Assisted by Services that Increase Self-Sufficiency	Number of households receiving services aimed to increase self-sufficiency (increase).	Approximately 1,000 FSS participants as of 12/31/12.	200 new FSS participants enrolled in FY2014, for a total of 1,200.
SS-6: Reducing Per Unit Subsidy Costs for Participating Households	Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	<u>Public Housing:</u> In FY2013, the average subsidy per public housing household was \$6,519 (based on 21,417 eligible units). <u>HCV:</u> In FY2013, the average subsidy per HCV household was \$8,922 (based on 36,679 eligible vouchers).	<u>Public Housing:</u> The average subsidy per public housing household will remain stable at \$6,500 (based on 21,400 eligible units) in FY2014. <u>HCV:</u> The average subsidy per HCV household will remain stable at \$8,900 (based on 36,500 eligible vouchers) in FY2014.
SS-7: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<u>Public Housing:</u> In FY2013, public housing FSS participants contributed a total of \$1,006,056 (237 households). <u>HCV:</u> In FY2013, HCV FSS participants contributed a total of \$1,831,476 (505 households).	<u>Public Housing:</u> The total contribution of public housing FSS participants will remain stable at \$1,000,000 (230 households) in FY2014. <u>HCV:</u> The total contribution of HCV FSS participants will remain stable at \$1,800,000 (500 households) in FY2014.

SS-8: Households Transitioned to Self-Sufficiency	Number of households transitioned to self-sufficiency (increase).	In FY2012, 109 participants graduated from the FSS program.	In FY2014, 110 participants will graduate from the FSS program.
<p>*For SS-3 tracking, CHA defines "employed" based on whether income from wages is recorded in Yardi, CHA's system of record.</p> <p>**For SS-8 tracking, CHA is establishing graduation from the FSS program as a definition of self-sufficiency.</p>			

- **Data Collection:** CHA will track the following for FSS program participants: average income from wages and employment status (defined as having income from wages), average escrow accumulation, program enrollment, participants receiving TANF, resident contribution toward rent and yearly graduation totals as a measure of self-sufficiency.
- **Authorization:** Attachment C, Section E of CHA's Amended and Restated MTW Agreement, which waives certain provisions of Section 23 of the 1937 Housing Act and 24 CFR 984.

CHA Re-Entry Pilot Program

- **Description and Impact:** CHA proposes a Re-entry Pilot Program for up to 50 eligible participants who are:
 - 1) reuniting with a qualifying family member currently living in CHA traditional public housing (excluding mixed-income sites) or participating in CHA's HCV Program, or
 - 2) on a CHA wait list and meeting eligibility requirements for the program when they are called for screening (in the existing wait list order).

In support of the City of Chicago Mayor's Office initiative to provide more resources and services for ex-offenders returning from prison, CHA is working with the Re-entry Committee of the Chicago Coalition for the Homeless to develop this pilot program.

CHA will partner with designated/approved re-entry program provider partners (Safer Foundation, Lutheran Social Services, or St. Leonard's Ministries) who will identify potential program participants to apply for the program. Eligibility requirements for the program include:

- Participants must have completed a minimum of one year in a re-entry program with one of the following Reentry Pilot service providers:
 - Safer Foundation
 - Lutheran Social Services
 - St. Leonard's Ministries
- Participants must be reuniting with spouse, parent, grandparent, sibling or adult child currently in CHA's Public Housing or HCV Program or must be on a CHA wait list.
- Participants with the following convictions are not eligible: murder, attempted murder, terrorism, and any of HUD's mandatory criminal background exclusions including sex offenses and criminal drug activity resulting in eviction (see CHA's HCV Administrative Plan and Public Housing Admissions and Continued Occupancy Policies/ACOP for detailed information).
- Participants must be drug free.

Participants will be required to consent to participation requirements of the Re-entry Pilot which will allow CHA to consult with the designated re-entry provider. Heads of Households will also be required to consent to participation and reunification with the participant family member. Participants must meet CHA's work requirement (including those who reunite with an HCV household) and engage in mandatory supportive services by one of the designated/approved re-entry provider partners. Services will include ongoing case management intervention for life skill development, mental health, and employment and training,

Participants will sign a conditional lease/agreement for a period of two years with the option to extend for another two years, pending compliance with program requirements. After successful completion of a four-year term, the family may request that the pilot participant be added to their household, with certain ongoing program requirements detailed in the lease/agreement.

CHA continues to work with the Mayor's Office and Re-entry Committee of the Chicago Coalition for the Homeless to finalize program parameters. This demonstration program was approved by CHA's Board in November 2014 and is pending HUD approval. Specific eligibility requirements and program criteria are outlined in a separate demonstration/pilot program policy document, available on CHA's website.

- **Implementation Year:** proposed FY2014
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
CE-4: Increase in Resources Leveraged	Amount of funds leveraged in dollars (increase).	Zero funds were leveraged through the re-entry pilot program prior to implementation.	\$35,000 funds leveraged through the re-entry pilot program for services for 10 initial participants in FY2014, pending CHA Board/HUD approval and program implementation in FY2014.
SS-1: Increase in Household Income	Average earned income of households affected by this policy in dollars (increase).	In FY2013, the average income from wages for 54,901 PH and HCV households was \$4,285.	The average income from wages for households with program participants will remain consistent with CHA's average in FY2014.
SS-3: Increase in Positive Outcomes in Employment Status*	Other category defined as: Having earned income.	In FY2013, 11,104 of 24,139 "work-able" PH and HCV heads of household had income from wages.	The percent of "work-able" heads of household with income from wages, with program participants, will remain consistent with CHA's overall work-able population in FY2014.
		In FY2013, 46% of "work-able" PH and HCV heads of household had income from wages.	
SS-5: Households Assisted by Services that Increase Self-Sufficiency	Number of households receiving services aimed to increase self-sufficiency (increase).	Zero program participants received services through the re-entry pilot program prior to implementation.	10 initial program participants will receive services through the re-entry pilot program in FY2014, pending CHA Board/HUD approval and program implementation in FY2014.
SS-6: Reducing Per Unit Subsidy Costs for Participating Households	Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	Public Housing: In FY2013, the average subsidy per public housing household was \$6,519 (based on 21,417 eligible units).	Public Housing: The average subsidy for PH households with re-entry pilot participants will remain consistent with CHA's average subsidy per public housing household in

		<u>HCV:</u> In FY2013, the average subsidy per HCV household was \$8,922 (based on 36,679 eligible vouchers).	FY2014. <u>HCV:</u> The average subsidy for HCV households with re-entry pilot participants will remain consistent with CHA's average subsidy per HCV household in FY2014.
SS-7: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<u>PH:</u> In FY2013, PH households contributed a total of \$65,718,276 (17,942 households) at an average of \$3,663 per household per year. <u>HCV:</u> In FY2013, HCV households contributed a total of \$123,023,928 (36,959 households) at an average of \$3,329 per household per year.	<u>PH:</u> The total contribution of public housing families with program participants will be consistent with CHA's average in FY2014. <u>HCV:</u> The total contribution of HCV families with program participants will be consistent with CHA's average in FY2014.
SS-8: Households Transitioned to Self-Sufficiency**	Number of households transitioned to self-sufficiency (increase).	Zero program participants transitioned from a conditional lease to join the household after four years prior to implementation.	Zero program participants will transition from a conditional lease to join the household in FY2014.
HC-5: Increase in Resident Mobility	Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	Zero program participants moved to CHA housing through the re-entry pilot program prior to implementation.	10 initial program participants will move to CHA housing through the re-entry pilot program in FY2014, pending CHA Board/HUD approval and program implementation in FY2014.
*For SS-3 tracking, CHA defines "employed" based on whether income from wages is recorded in Yardi, CHA's system of record. **For SS-8 tracking, CHA is establishing the transition of re-entry program participants from a conditional lease to join the household as a definition of self-sufficiency.			

- Data Collection: CHA, in partnership with re-entry providers, will track the number of program participants, participant compliance with requirements and service participation. CHA will also track self-sufficiency metrics for participant households.
- Authorization: Attachment C, Section B(4), C(2), C(9)(b), D(1)(b), D(3)(b) and D4 of CHA's Amended and Restated MTW Agreement which allow the development of conditional housing programs and alternative eligibility and program requirements and waive certain provisions of Sections 3, 4, 5, 8, and 9 and Section 6 (I), and Sections 8(o)(6), 8(o)(7)(a), 8(o)(13)(F), 8(o)(13)(G) 8(o)(13)(J) and 8(o)(16), of the 1937 Act and 24 CFR 941, 960 Subpart B, 966 Subparts A and B, 982.303, 982.30,5 982.309, 982.516, 982 Subpart E and 983 Subpart F.

CHA is seeking MTW authority specifically to implement conditional program participation agreements and mandatory participation in services as a component of the program.

MTW Activities Related to Housing/Development

Reasonable Cost Formula and Methodologies for Redevelopment and Rehabilitation Activities

- **Description and Impact:** In FY2010, HUD approved an alternative reasonable cost formula for CHA redevelopment activities to replace HUD's current Total Development Cost (TDC) limits. Rising construction costs, reduced low-income housing tax credit equity prices, and reduced soft loan funds had combined to significantly reduce the number of new public housing units that CHA was able to deliver at mixed-income development sites. The increased reasonable cost limits cover the full cost of public housing units, as originally intended, and increase public housing opportunities on an annual basis. The current impact of the increased reasonable cost limits is that CHA is able to finance the full cost of public housing units in mixed-income developments which allows the tax equity and soft loan funds to be directed toward the construction of the accompanying affordable housing units at these mixed-income developments.

Beginning in FY2014, CHA proposes to utilize this alternative reasonable cost formula for both redevelopment and rehabilitation projects. Based on parameters for rehabilitation in the Capital Fund regulations, CHA has determined it no longer needs separate alternative reasonable cost limitations for rehabilitation and redevelopment. CHA will instead utilize one alternative reasonable cost formula for all projects moving forward, and, in accordance with Capital Fund regulations, rehabilitation project cost levels will be no more than 90% of the alternate cost formula.

- **Implementation Year:** FY2010 (expansion of this activity proposed in FY2014)
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Status Update:** As planned for FY2013, the reasonable cost formula was used for all three mixed income developments that closed in FY2012 and were under construction and projected unit delivery in FY2013: Oakwood Shores 2C, Lakefront Phase II, and Oakwood Shores 2D. CHA also used the reasonable cost formula for the Shops and Lofts at 47 mixed income development that closed in February 2013 and is projected to complete the delivery of 28 units in FY2014, and at Dorchester Artist Housing which closed in September 2013 and will deliver 12 public housing units in FY2014. In addition, CHA anticipates using the reasonable cost formula to close and start construction on 37 public housing units at Park Boulevard 2B and 30 public housing units at Legends South C3 by the end of FY2013.

Pending HUD approval in the fall of FY2014, CHA proposes to use this alternative reasonable cost formula for several upcoming rehabilitation/modernization projects. CHA anticipates rehabilitation work on approximately 60 units in senior and scattered site housing beginning in the fall of FY2014 through the end of the year.

- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
HC-1: Additional Units of Housing Made Available	Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0 additional public housing units made available without the alternate TDC formula.	31 additional public housing units will be under construction at four mixed-income developments in 2014.

HC-2: Units of Housing Preserved	Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	Zero housing preserved through the alternate TDC formula.	60 housing units preserved/rehabilitated through the alternate TDC formula in FY2014.
HC-3: Decrease in Wait List Time	Average applicant time on wait list in months (decrease).	As of FY2013, 11,313 applicants on the Public Housing Family Wait List have an average wait time of 41 months.	The average wait time for 11,313 applicants on the Public Housing Family Wait List will remain stable at 41 months in FY2014.
HC-4: Displacement Prevention	Number of households at or below 80% AMI that would lose assistance or need to move (decrease).	Zero households lost assistance or had to move prior to the alternate TDC formula.	Zero households will lose assistance or move as a result of the alternate TDC formula in FY2014.
HC-5: Increase in Resident Mobility	Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	Zero households moved to a better unit as a result of the alternate TDC formula prior to implementation.	40 households will move to a better unit as a result of the alternate TDC formula in FY2014, pending unit delivery schedules for Shops/Lofts and Dorchester.
CE-1: Agency Cost Savings	Total cost of task (in dollars).	CHA spent zero dollars through the use of the alternate TDC formula prior to implementation.	In FY2014, CHA projects a cost of \$9,324,248 for 31 additional units at 4 mixed-income sites through use of the alternate TDC formula. In FY2014, CHA estimates a cost of \$1.9M for rehabilitation projects using the alternate TDC formula.

Mixed-Income Developments to be under construction in FY2014	Public housing units without MTW TDC	Additional public housing units with MTW TDC	Total Public Housing Units in Mixed Income Sites
Shops/Lofts	18	10	28
Dorchester	8	4	12
Park Boulevard IIB	26	11	37
Legends South C3	24	6	30
TOTAL UNITS	76	31	107

- Data Collection: CHA tracks the additional number of public housing units that can be constructed and delivered toward the 25,000 goal using the alternative cost formula for redevelopment. CHA also tracks the average time on the Public Housing Family Wait List and the cost of the activity. Pending approval, CHA will track the number of units rehabilitated/preserved through the use of this alternative cost formula.
- Authorization: Attachment C, Section C (16) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of Section 6(b) of the 1937 Act and 24 C.F.R. 941.306. This allows CHA to establish an alternative reasonable cost formula reflecting CHA's actual costs experienced for construction activity in the local market as the cost control measure for quality construction work.

Ongoing MTW Activities

Section VI: Ongoing MTW Activities - HUD Approval Previously Granted

This section contains information on CHA's ongoing MTW activities that have previously been approved by HUD that will also be carried out in FY2014. A summary table of ongoing MTW Activities is found on p. 83.

In May 2013, HUD released the revised Attachment B/Form 50900 which includes new MTW reporting requirements for MTW agencies. Based on these new requirements, all ongoing FY2014 MTW activities described below have been updated to applicable HUD Standard Metrics. CHA will continue to track HUD standard metrics moving forward for all existing and newly proposed MTW activities. As required, CHA will fully adopt the new Form 50900 requirements for all elements of annual plans/reports beginning with the FY2013 MTW Annual Report. CHA continues to work with HUD for technical guidance and feedback on MTW reporting processes and requirements.

CHA has not made any changes to the authorizations planned for the below ongoing FY2014 MTW activities.

To date, outside evaluators have not been used to further assess CHA's ongoing MTW activities.

MTW Activities Related to Housing/Development

Revitalization of 25,000 Units

- Description and Impact: CHA is committed to the goal of replacing 25,000 housing units as part of the original Plan for Transformation commitments. Each year CHA continues to make progress toward the goal by completing additional housing units and creating more housing options for CHA's residents. The impact of this activity is that more affordable housing opportunities are available to low-income residents in Chicago neighborhoods through rehabilitation, redevelopment, acquisition and the use of project-based vouchers.
- Implementation Year: FY2000
- Statutory Objective: MTW Statutory Objective I: Increase housing choices for low-income families.
- Status Update: CHA continues to make progress toward the goal of 25,000 housing units through continued mixed-income redevelopment and the Property Rental Assistance (project-based voucher) program. CHA also continues to explore new strategies for public housing acquisition.
- Standard Metrics:

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
HC-1: Additional Units of Housing Made Available	Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	Zero units were delivered toward the 25,000 unit goal prior to FY2000.	CHA will deliver 563 new housing units in FY2014 toward the 25,000 unit goal.
HC-2: Units of Housing Preserved	Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	Zero units were rehabilitated toward the 25,000 unit goal prior to FY2000.	CHA will rehabilitate 0 units in FY2014 toward the 25,000 unit goal.

- **Data Collection:** CHA tracks the number of public housing units delivered and newly available for occupancy toward the 25,000 unit goal, including units completed through new construction, rehabilitation, as well as project-based units under HAP contracts in Chicago.
- **Authorization:** Attachment D, Paragraph 1 and Amendment 3 of CHA's Amended and Restated MTW Agreement in which the 25,000 unit goal addresses the requirement of Section 204(c) (3) (c) of the 1996 Appropriations Act.

Reasonable Cost Formula and Methodologies for Rehabilitation

- **Description and Impact:** Beginning in FY2008, CHA established reasonable cost limitations for rehabilitation activities in place of HUD's Total Development Cost (TDC) limits. The reasonable cost formula converts CHA's historical construction costs and market conditions into a table of limitations by unit bedroom size and building structure type. CHA updates the database with market data based upon the latest market conditions in Chicago. To establish reasonable cost limitations, data is extracted from the latest construction bids for rehabilitation activity and from evaluations of current market conditions, which are determined by conducting market research of escalation factors in industry publications. The impact of the use of the reasonable cost formula for rehabilitation is that CHA can move forward with rehabilitation activity in alignment with established construction schedules in order to meet unit delivery goals while minimizing cost overages resulting from construction delays.
- **Implementation Year:** FY2008
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families
- **Status Update:** Pending HUD approval of the proposed expansion of CHA's *Reasonable Cost Formula and Methodologies for Redevelopment* (as described previously in this amendment), CHA will close out this activity in FY2014 and no longer use the alternative reasonable cost limitations for rehabilitation that were established and approved in FY2008. CHA has not utilized this reasonable cost formula since FY2011. CHA has determined it no longer needs separate alternative reasonable cost limitations for rehabilitation and redevelopment. CHA will utilize the existing alternative reasonable cost formula for redevelopment for all projects moving forward, and, in accordance with Capital Fund regulations, rehabilitation project cost levels will be no more than 90% of the alternate cost formula.
- **Authorization:** Attachment C, Section C(16) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of Section 6(b) of the 1937 Act and 24 C.F.R. 941.306. This allows CHA to establish an alternative reasonable cost formula reflecting CHA's actual costs experienced for construction activity in the local market as the cost control measure for quality construction work.

MTW Activities Related to Public Housing and HCV

All Clear Utility Debt Assistance Program

- **Description and Impact:** CHA is authorized to offer assistance to eligible CHA residents to keep current with their utility payments and remain lease compliant. In partnership with ComEd, the program, known as All Clear, helps eligible residents clear utility debt and so they can be current with their utility bills after receiving assistance. CHA has authority to provide funding for this program in addition to ComEd funds in a given year. Eligible residents must pay 50% of the total amount of their utility debt, and the program provides the other 50% up to a maximum of \$500. Residents are notified of their eligibility through notification letters and a special help line is set up to assist residents who are eligible to participate. Assistance is offered to eligible residents only until the funds are exhausted in a given year. CHA uses the All Clear utility assistance program as a self-sufficiency measure. Clearing outstanding debt can be a first step toward financial stability.
- **Implementation Year:** FY2013 (as an MTW activity)

- **Statutory Objective:** MTW Statutory Objective II: Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
- **Status Update:** All Clear will continue to be implemented in partnership with ComEd. In FY2014, ComEd will contribute all funding for the program; CHA will not contribute funds for this program in FY2014. Beginning in FY2013 and through FY2014, all participants are required to participate in a financial workshop in order to receive the utility assistance.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
SS-5: Households Assisted by Services that Increase Self Sufficiency	Number of households receiving services aimed to increase self-sufficiency (increase).	0 households participated in All Clear before implementation.	7,500 households will participate in All Clear in FY2014.
SS-8: Households Transitioned to Self-Sufficiency	Number of households transitioned to self-sufficiency (increase).	0 households cleared their utility debt through All Clear before implementation.	7,500 households will clear their utility debt through All Clear in FY2014.
*For SS-8 tracking, CHA is establishing “clearing utility debt” as a definition of self-sufficiency.			

- **Data Collection:** CHA tracks the number of residents assisted and who are able to clear utility debt, the amounts of utility debt paid by residents and by ComEd and CHA, as well as outcome data on residents’ ability to stay current with utility bills after participating in the program.
- **Authorization:** Amendment No. 6 to CHA’s Amended and Restated MTW Agreement which authorizes implementation of approved local, non-traditional activities using MTW funds.

\$75 Minimum Rent for Public Housing and HCV

- **Description and Impact:** Through the approval of the FY2007 ACOP for public housing and the approval of the FY2008 HCV Administrative Plan, CHA instituted an increase in the minimum rent from \$50 to \$75 for public housing and HCV programs. The \$75 minimum rent was approved in FY2008 and first implemented in FY2009 across both programs as resident re-examinations took place. The impact of the revised minimum rent level is an increase in rent collection revenue from residents paying the minimum rent.
- **Implementation Year:** FY2009 (public housing and HCV)
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:** CHA continues to allow residents across both public housing and HCV programs to pay a minimum rent of \$75 or less if they request a hardship to minimum rent. Historically, CHA has only tracked the public housing component of this MTW activity. Beginning in FY2013 and moving forward, CHA will track outcomes for both public housing and HCV related to this activity.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
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CE-5: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	<p><u>Public housing:</u> In FY 2008 1,524 residents were expected to pay \$50 minimum rent for a total annual contribution of \$914,400.</p> <p><u>HCV:</u> In FY2008, 5,010 residents were expected to pay \$50 minimum rent for a total annual contribution of \$3,006,000.</p>	<p><u>Public housing:</u> In FY2014, CHA estimates 1,595 residents will be paying \$75 minimum rent for a total annual contribution of \$1,435,497.</p> <p><u>HCV:</u> In FY2014, CHA estimates 7,206 residents will be paying \$75 minimum rent for a total annual contribution of \$6,484,969.</p>
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- **Data Collection:** CHA tracks Total Tenant Payment (TTP) data to determine the number of residents who contribute \$75 towards rent. In FY2014, CHA will begin to track on a monthly basis rent collected (PH) and HAP issued (HCV) for the minimum rent population and those granted hardships.
- **Authorization:** For public housing, Attachment C, Section C(11) of CHA’s Amended and Restated MTW agreement, which waives certain provisions of Section 3(a)(2), 3(a)(3)(A) and Section 6(l) of the 1937 Act and 24 C.F.R.5.603, 5.611, 5.628, 5.630, 5.632, 5.634 and 960.255 and 966 Subpart A. For HCV, Attachment C, Section D(2)(a) of CHA’s Amended and Restated MTW agreement which waives certain provisions of Sections 8(o)(1), 8(o)(2), 8(o)(3), 8(o)(10) and 8(o)(13)(H-I) of the 1937 Act and 24 CFR 982.508, 982.503 and 982.518. These waivers allow CHA to determine the minimum rent amount.

MTW Activities Related to Public Housing Only

Public Housing Work Requirement

- **Description and Impact:** CHA implemented a work requirement in FY2009 as a condition of occupancy across its public housing portfolio. Applicable adult members of public housing households are required to be engaged in employment or employment related activities for, at least, 20 hours per week, unless the resident is eligible for an exemption or granted Safe Harbor. With the BOC approval of the FY2011 ACOP, CHA changed the age range of the work requirement to apply to adult members of public housing households age 18 to age 54, or age 17 and not attending school full time.⁵ In addition, upon a third request for Safe Harbor and subsequent requests, CHA now requires residents who seek Safe Harbor for reason of failure to obtain employment to work with their service provider to obtain a workforce assessment and to develop an action plan prior to returning to a property manager. If a resident is seeking Safe Harbor for any other reason (e.g. waiting on SSI determination); this process does not apply. Residents who are approved for Safe Harbor are re-examined every 90 days to determine their compliance. If a resident is denied Safe Harbor, the resident has the right to grieve CHA’s decision through the grievance process outlined in CHA’s Resident’s Grievance Procedure.

CHA provides resources to aid residents in fulfilling the work requirement through case management services and workforce development programs. The impact of the public housing work requirement is a greater number of residents engaged in employment, education, job training, and community service in order to achieve self-sufficiency. This activity is related to MTW Statutory Objective II: Give incentives to families with children where

⁵ The original work requirement applied to every adult member of a public housing household, age 18 to age 61 (or age 17 and not attending school full time).

the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.

- Implementation Year: FY2009
- Statutory Objective: MTW Statutory Objective II: Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
- Status Update: The public housing work requirement continues to be implemented successfully.
- Standard Metrics:

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
SS-1: Increase in Household Income*	Average earned income of households affected by this policy in dollars (increase).	In FY2013, the average income from wages for households with a “work-able” adult subject to the work requirement was \$11,365 (5,081 households).	The average income from wages for households with a “work-able” adult subject to the work requirement will remain stable at \$11,300 in FY2014 (5,000 households).
SS-3: Increase in Positive Outcomes in Employment Status*	Other category: Having earned income.	2,347 “work-able” public housing heads of household subject to the work requirement had income from wages in 2008.	3,391 “work-able” public housing heads of household subject to the work requirement will have income from wages in FY2014.
		52.7% of work-able public housing heads of household subject to the work requirement had income from wages in 2008.	59% of work-able public housing heads of household subject to the work requirement will have income from wages in FY2014.
SS-4: Households Removed from TANF	Number of households receiving TANF assistance (decrease).	In FY2013, 2,390 “work-able” public housing households with a “work-able” adult subject to the work requirement received TANF.	In FY2014, the number of “work-able” public housing households with a “work-able” adult subject to the work requirement receiving TANF will remain stable at 2,300.
SS-5: Households Assisted by Services that Increase Self Sufficiency	Number of households receiving services aimed to increase self-sufficiency (increase).	In FY2013, 4,527 public housing households with a “work-able” adult subject to the work requirement were engaged with service providers through Family Works.	The number of public housing households with a “work-able” adult subject to the work requirement were engaged with service providers through Family Works will remain

			stable at 4,500 in FY2014.
SS-6: Reducing Per Unit Subsidy Costs for Participating Households	Average amount of Section 8 and/or 9 subsidy per household affected by this policy in dollars (decrease).	In FY2013, the average subsidy per public housing household was \$6,519 (based on 21,417 eligible units).	The average subsidy per public housing household will remain stable at \$6,500 (based on 21,400 eligible units) in FY2014.
SS-7: Increase in Agency Rental Revenue	Rental revenue in dollars (increase).	In FY2013, public housing households with a “work-able” adult subject to the work requirement contributed a total of \$21,401,844 (5,081 households).	The total contribution of public housing households with a “work-able” adult subject to the work requirement will remain stable at \$21,400,000 in FY2014.
SS-8: Households Transitioned to Self-Sufficiency	Number of households transitioned to self-sufficiency (increase).	In FY2012, 52% of households subject to the work requirement (2,246 of 4,350 households) had all adults in compliance.	The percent and number of households subject to the work requirement that will have all adults in compliance will remain stable at 50% (2,200 households) in FY2014.
HC-3: Decrease in Wait List Time	Average applicant time on wait list in months (decrease).	As of FY2013, 11,313 applicants on the Public Housing Family Wait List have an average wait time of 41 months.	The average wait time for 11,313 applicants on the Public Housing Family Wait List will remain stable at 41 months in FY2014.
<p>*For SS-1 and SS-3 tracking, CHA defines “work-able residents” as those age 18 to 54 who are not receiving SSI, SSDI or a pension. CHA defines “employed” based on whether income from wages is recorded in Yardi, CHA’s system of record.</p> <p>*For SS-8, CHA is establishing households in which all adults are compliant with the work requirement as a definition of self-sufficiency.</p>			

• Additional Metrics:

Additional Metric	Unit of Measurement	Baseline	2014 Benchmark
Work Requirement Compliance Status	Number/Percent of residents in each work requirement compliance status (Compliant, Safe Harbor, Exempt, Under Legal, Non-compliant)	49% (4,149) compliant 27% (2,292) exempt 20% (1,724) safe harbor 1% (71) non-compliant 3% (297) under legal as of 12/31/12.	Of the families with a Safe Harbor designation at the end of FY2013, move 3% to compliance in FY2014.

- **Data Collection:** CHA tracks work requirement compliance at the time of re-examination. CHA tracks the changes in compliance status each year compared to the previous year. In addition, CHA tracks income and employment outcomes for work-able public housing heads of household as well as contribution toward rent, average subsidy, receipt of TANF, engagement in services and average time for applicants on the wait list.
- **Authorization:** Attachment D, Paragraph 21 of CHA’s Amended and Restated MTW Agreement which gives CHA authority to implement a work requirement as a condition of tenant occupancy in public housing.

Office of the Ombudsman

- **Description and Impact:** CHA established the Office of the Ombudsman in FY2008 to address the concerns of public housing residents in mixed-income communities. The Ombudsman serves as a liaison between residents and CHA leadership, while providing a forum for residents to learn about the benefits and offerings in the mixed-income communities. The Ombudsman holds meetings for public housing residents renting in mixed-income developments by region. Residents and other community members are provided an opportunity to share comments and concerns at these meetings, and comments are collected, responded to, and posted on CHA’s website. The impact of this activity is that, by providing designated CHA staff to assist public housing residents in mixed-income communities in resolving any public housing related issues that may arise, residents are able to adapt to their new communities.
- **Implementation Year:** FY2008
- **Statutory Objective:** MTW Statutory Objective II: Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
- **Status Update:** The Office of the Ombudsman continues to address resident concerns and engage in community building activities. The focus is increasingly on encouraging residents to access available services. In FY2013, regional meetings began to include a service fair component, with representatives and information from local organizations that provide services.

• **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
SS-5: Households Assisted by Services that Increase Self-Sufficiency	Number of households receiving services aimed to increase self-sufficiency (increase).	0 residents engaged before the Office of the Ombudsman existed.	500 residents engaged through the Office of the Ombudsman in FY2014.

• **Additional Metrics:**

Additional Metric	Unit of Measurement	Baseline	2014 Benchmark
Regional meetings to engage residents	Number of meetings held	0 meetings held before the creation of the Office of the Ombudsman.	Minimum of six meetings for mixed-income residents in FY2014.

- **Data Collection:** CHA tracks the number of residents engaged through the Office of the Ombudsman, the number of meetings and resident participants, and posts the meeting notes and responses on CHA’s website.

- **Authorization:** Attachment D, Paragraph 20 of CHA’s Amended and Restated MTW Agreement, which waives provisions of 24 CFR 964.18 as well as 24 CFR 964 Subpart B.

MTW Activities Related to HCV Program Only

Exception Payment Standards

- **Description and Impact:** In FY2010, CHA received HUD approval to implement exception payment standards that exceed the standard limit of 110% of HUD’s published Fair Market Rents (FMRs) for the City of Chicago.^[1] Following an extensive analysis in FY2014, CHA lowered the limit for exception payment standards to no more than 150% of HUD FMR for all new requests with phase out of existing exception payments that exceed 150% over the next three years.

Exception payment standards are part of CHA’s strategy to expand housing choices for HCV participants through access to Opportunity Areas throughout Chicago. CHA currently defines Opportunity Areas as census tracts with low poverty and low subsidized housing (in addition to some census tracts with low poverty, moderate subsidized housing, and improving community economic characteristics). Approval of exception payment standards is determined on a case-by-case basis. CHA will approve an exception payment standard only in the following cases:

1. CHA has approved a reasonable accommodation for the family; or
2. The family is residing in or moving into a CHA-designated Opportunity Area.

The impact of this activity is an increase in housing opportunities in neighborhoods designated as Opportunity Areas that typically may have higher rents.

- **Implementation Year:** FY2010
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Status Update:** As of June 2013, CHA has approved 65 exception payment standards since this activity was authorized. In FY2014, CHA will continue owner outreach and retention efforts in Opportunity Areas through the Mobility Program and the Owner Excellence Program. In addition, CHA is currently reviewing exception payment standards data to evaluate and ensure the financial sustainability of this activity.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
HC-5: Increase in Resident Mobility	Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	In FY2012, 37 households leased in Opportunity Areas with exception payment standards.	In FY2014, a total of 192 households leased (including new and existing leases) in Opportunity Areas with exception payment standards.

- **Data Collection:** CHA tracks the number of HCV participants living in Opportunity Areas with and without exception payment standards.
- **Authorization:** Attachment C, Section D(2)(a-c) of CHA’s Amended and Restated MTW Agreement, which waives certain provisions of Section 8(o)(1-3), 8(o)(7), and 8(o)(10) of the 1937 Act and 24 C.F.R. 982.308, 982.503, 982.507, 982.508, 982.518, and 982.451.

^[1] In FY2010, CHA received approval to implement exception payment standards that may be up to 300% of HUD’s Fair Market Rents (FMRs).

HCV Owner Excellence Program MTW Activities

CHA implemented the Owner Excellence Program (OEP) on September 1, 2011. Prior to membership, an owner must be accepted into the program and fulfill certain requirements, such as completing courses in HQS, HCV, and property management. Since implementation, as of June 2013, CHA has received a total 772 applications and enrolled 371 OEP members.

As part of the OEP Program, owners may be eligible for a Unit Excellence Program (UEP) designation, which began in May 2012. Prior to August 1, 2013, participation in the Unit Excellence Program (UEP), which provides additional unit-based benefits, such as acceptance of passed inspections for new tenancy approvals, vacancy payments, and biennial inspection, was optional. In FY2013, CHA changed this policy by requiring all new OEP owners to have at least one (1) UEP unit in their portfolios. Existing OEP owners will have until August 1, 2014 to comply with this new policy, and failure to comply will result in OEP membership termination. Unit-based benefits will continue to be restricted to UEP units. As of June 2013, a total of 114 OEP members have at least one (1) UEP unit for a total of 586 occupied UEP units.

The following three MTW activities are related to the HCV Owner Excellence Program and available for eligible UEP units.

Owner Excellence - Acceptance of Passed Annual or Initial HQS Inspection for New Request for Tenancy Approval within 90 Days of Passed Date

- **Description and Impact:** As part of the HCV Owner Excellence Program, and for units with a UEP designation only, CHA is authorized to approve tenancy for a unit that passed inspection within the previous 90 calendar days without conducting a new inspection for each Request for Tenancy Approval [RTA] received. The purpose of this activity is to provide incentives to retain high quality owners and units, to continue to provide viable housing options for HCV participants.
- **Implementation Year:** FY2012 (approved FY2011)
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low income families.
- **Status Update:** As of June 2013, 10 UEP units have received the benefit of a transferred “passed” annual or initial inspection result. Based on the number of moves in UEP units for FY2012 and FY2013, CHA estimates a yearly average of 10 moves and a 53% rate of moves with a transferred “passed” inspection result.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
HC-5 Increase in Resident Mobility	Number of households able to move to a better unit and/or neighborhood of opportunity as a result of the activity (increase).	In FY2012, 0 households leased UEP units where a passed annual or initial inspection was transferred (passed inspection within 90 days of RTA receipt).	5 new households leased in UEP units in FY2014 where a passed annual or initial inspection result was transferred.
CE-1: Agency Cost Savings	Total cost of task (in dollars).	CHA is currently conducting an evaluation of the Owner Excellence Program, which includes a thorough review of	CHA is currently conducting an evaluation of the Owner Excellence Program, which includes a thorough review of

		performance metrics. CHA will establish a baseline in the FY2014 Annual Report.	performance metrics. CHA will report on outcomes in the FY2014 Annual Report.
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	CHA is currently conducting an evaluation of the Owner Excellence Program, which includes a thorough review of performance metrics. CHA will establish a baseline in the FY2014 Annual Report.	CHA is currently conducting an evaluation of the Owner Excellence Program, which includes a thorough review of performance metrics. CHA will report on outcomes in the FY2014 Annual Report.

- **Data Collection:** CHA tracks the number of new households who lease available UEP units where a passed annual or initial inspection result transferred. CHA is currently conducting an evaluation of the Owner Excellence Program, which includes a thorough review of performance metrics, and will provide updates in the FY2014 Annual Report.
- **Authorization:** Attachment C, Section D (5) of the MTW Agreement which waives certain provisions of Section 8(o) (8) of the 1937 Act and 24 CFR 982 Subpart I.

Owner Excellence - Vacancy Payments

- **Description and Impact:** As part of CHA's Owner Excellence Program, CHA is authorized to provide a modest vacancy payment to participating owners who re-lease a Unit Excellence Program [UEP] unit to another HCV participant. CHA will provide vacancy payments to eligible owners upon the execution of a new HAP contract for a re-leased UEP unit. One-hundred percent of the previous family's HAP amount will be paid to participating owners for the vacant period not to exceed 60 days. The unit shall be deemed vacant (A) commencing on the first day for which HAP is not paid for the unit following completion of a move out or termination of the lease, and (B) ending on the day preceding the first day for which HAP is paid for such unit based on the execution of a new HAP with CHA. The purpose of this activity is to provide incentives to retain high quality owners and units in the program, and to continue to provide viable housing options for families.
- **Implementation Year:** FY2012 (approved FY2011).
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low income families.
- **Status Update:** As of June 2013, CHA has issued a total of \$30,558 in vacancy payments for 19 UEP units. Based on the average of FY2012 and FY2013, CHA estimates the approval of 10 vacancy payments in FY2014.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
HC-2: Units of Housing Preserved	Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	9 UEP units preserved through vacancy payments in FY2012.	10 UEP units will be preserved through a vacancy payment in FY2014.

- **Data Collection:** CHA tracks the number of UEP units preserved in the HCV program through vacancy payments. CHA is currently conducting an evaluation of the Owner Excellence Program, which includes a thorough review of performance metrics, and will provide updates in the FY2014 Annual Report.
- **Authorization:** Attachment C, Section D(1) (d) of the MTW Agreement which waives certain provisions of Sections 8(o) (9) of the 1937 Act and 24 CFR 982.311.

Owner Excellence - Biennial Inspections

- **Description and Impact:** As part of CHA's Owner Excellence Program, units with UEP designation will be inspected on a biennial basis. The impact of this activity is a reduction in staff hours spent on conducting inspections, which subsequently will result in administrative cost savings.
- **Implementation Year:** FY2012 (approved FY2011), with full implementation by 2014
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:** Zero (0) UEP units have received the biennial inspections benefit. CHA expects to start applying biennial inspection benefits to UEP units in FY2014.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
CE-1: Agency Cost Savings	Total cost of task in dollars (decrease).	Between FY2012 and FY2013, CHA estimates spending \$68,704 conducting annual inspections of UEP units (716 projected UEP units by 12/31/13 x \$96).	In FY2014, CHA will spend \$38,112 conducting biennial inspections (397 projected UEP units x \$96).
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	Between FY2012 and FY2013, CHA estimates spending 658 staff hours on annual inspections (716 projected UEP units by 12/31/13 x .92 hours).	In FY2014, CHA will spend 365 staff hours on annual inspections (397 projected UEP units x .92 hours).
CE-3: Decrease in Error Rate of Task Execution	Average error rate in completing a task as a percentage (decrease).	CHA is currently conducting an evaluation of the Owner Excellence Program, which includes a thorough review of performance metrics. CHA will establish a baseline in the FY2014 Annual Report.	CHA is currently conducting an evaluation of the Owner Excellence Program, which includes a thorough review of performance metrics. CHA will report on outcomes in the FY2014 Annual Report.

- **Data Collection:** CHA estimates the cost of an initial inspection is \$96 and takes .92 staff hours (55 minutes). CHA tracks biennial inspections for UEP units and the associated staff time and cost savings. CHA is currently conducting an evaluation of the Owner Excellence Program, which includes a thorough review of performance metrics, and will provide updates in the FY2014 Annual Report.
- **Authorization:** Attachment C, Section D(5) of the MTW Agreement which waives certain provisions of Section 8(o) (8) of the 1937 Act and 24 CFR 982 Subpart I.

MTW Activities Related to Property Rental Assistance/Project-Based Voucher Program

Exceed the Limit of 25% Project-Based Voucher Assistance in Family Properties

- **Description and Impact:** CHA is authorized to increase the percent of assisted PBV units in certain projects above the regulatory limit of 25% per family building. CHA uses this flexibility to create innovative funding structures for PBV developments and enhance its Property Rental Assistance Program. The impact of making PBVs available in excess of the 25% limit is that more developers are enticed to preserve or create affordable housing, increasing the availability of quality housing options throughout Chicago’s communities for low-income individuals and families.
- **Implementation Year:** FY2008
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low-income families.
- **Status Update:** Through the end of FY2013, CHA will use this flexibility in 11 family PBV developments containing a total of 399 units, of which 136 are PBV units. Of the 136 PBV units, 41 are a result of exceeding the 25% limit. In FY2014, CHA anticipates using this flexibility for 2 additional family developments containing a total of 26 PBV units, of which 8 will be a result of exceeding the 25% limit. In addition 51 housing units for low-income families will be preserved through this activity in FY2014.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
HC-1: Additional Units of Housing Made Available	Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0 additional PBV units were made available by exceeding 25% in family PBV properties prior to FY2008.	8 (out of 26) additional PBV units made available by exceeding 25% in family PBV properties in FY2014.
HC-2: Units of Housing Preserved	Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	0 housing units for low-income households were preserved by exceeding 25% in family PBV properties prior to FY2008.	51 housing units for low-income households will be preserved by exceeding 25% in family PBV properties in FY2014.

- **Data Collection:** CHA tracks the number of additional PBV units in family properties made available through the flexibility to exceed the 25% limit.
- **Authorization:** Attachment D, Paragraph 6 of CHA’s Amended and Restated MTW Agreement which waives Section 8(o)(13)(D)(i) of the 1937 Act and 24 CFR 983.56. This waiver provides CHA with the ability to supply more affordable housing units in family PBV buildings.

Authorization of Qualified PRA Owners/Property Managers to Perform Initial Eligibility Determinations and Re-examinations

- **Description and Impact:** CHA has authority to train and certify qualified owners, as defined by CHA, in the Property Rental Assistance (PRA) Program to perform initial tenant eligibility determinations and re-examinations of PBV participants. CHA will require the owners to enter re-examination and initial eligibility data into CHA's systems of record for transmission to HUD PIC, will monitor owner performance monthly, and will perform comprehensive quality control reviews. However, CHA will continue to monitor EIV for income verification and participating owners will not be granted access to this function. The anticipated impact of this activity is to reduce costs, to minimize the duplication of effort, and to administer the PRA program using a best practices model for privately-managed mixed-income and public housing developments.
- **Implementation Year:** FY2012 (approved FY2011)
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:** To date, CHA has completed the following activities to plan for the implementation of authorizing qualified owners/property managers to perform initial eligibility determinations and reexaminations:
 - Performed Asset Management Reviews and developed risk ratings for all PRA properties to determine which owners/property managers are qualified to do initial eligibility determinations and reexaminations;
 - Began creating process flows and developing policy and procedures to be followed by qualified owners/property managers to ensure initial eligibility and reexamination screenings are done correctly;
 - Identified those owners who currently use Yardi, CHA's system of record;
 - Set up security groups to allow qualified owners/property managers access to YARDI to perform initial eligibility and reexamination screenings, and to ensure they have the proper level of system access.
 - By the end of 2013 CHA plans to select two qualified owners/property managers to pilot this new initiative.

In FY2014 CHA anticipates allowing 11 additional qualified owners/property managers with 276 units to perform initial eligibility determinations and reexaminations of PBV participants. CHA's FY2014 anticipated cost savings is expected to be \$124,000 for initial eligibility and reexaminations performed by qualified PRA owners for 276 units.

- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
CE-1: Agency Cost Savings	Total cost of task in dollars (decrease).	In FY2012, CHA spent \$1,081,356 for PRA initial eligibility determinations and re-examinations prior to implementation (2,425 units x \$445.92).	In FY2014, CHA will spend \$957,356 by allowing owners to perform initial eligibility determinations and re-examinations (2,149 units x \$445.92).
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	In FY2012, 8,488 hours of staff time were dedicated to PRA initial eligibility determinations and re-examinations prior to implementation (2,425 units x 3.5 hours).	In FY2014, 7,522 hours of staff time will be dedicated to PRA initial eligibility determinations and re-examinations (2,149 units x 3.5 hours).

- **Data Collection:** CHA estimates the cost of conducting PRA initial eligibility determinations and re-examinations per unit is \$445.92 yearly based on a \$37.16 monthly PUC. CHA tracks the decrease in costs and staff time associated with allowing qualified owners to perform initial eligibility determinations and re-examinations. CHA currently estimates it takes 3.5 hours to conduct an initial eligibility determination or re-examination. As mentioned for proposed biennial and triennial re-examinations, CHA will update the time study in FY2014.
- **Authorization:** Attachment C, Section D (1)(a), (1)(c), and 3(b) of CHA's Amended and Restated MTW Agreement, which waive certain provisions of Sections of 8(o)(5) and 8(o)(7) of the 1937 Act and 24 C.F.R. 982.162, 24 C.F.R. 982.516, and 982 subpart E.

Authorization of Qualified PRA Owners/Property Managers to Perform Annual Inspections

- **Description and Impact:** CHA performs quality control inspections of Property Rental Assistance (PRA) units and developments consistent with best practices in subsidized-property management. CHA employs a model similar to one that is used by privately-managed public housing and mixed-finance developments. Under this approach, CHA will require owners, through their property managers or contract inspectors that have demonstrated successful property management knowledge and/or experience, to inspect all project-based voucher units annually to insure that they meet HQS and Chicago Building Code requirements. Such owners will be required to certify inspection results and confirm timely repairs. In addition, owners will be required to perform turnover and special inspections and to maintain documentation for CHA review. CHA will perform quality control inspections, review property records of inspections and repairs, and assess the overall property conditions annually. For all properties, CHA will reserve the right to inspect all units in the property as deemed essential to ensure that the property meets inspections standards. The anticipated impact of this activity is to reduce duplicative inspections as well as the associated tenant inconvenience in developments that have additional governmental funding such as tax credits and state-financed loans.
- **Implementation Year:** FY2012 (approved FY2011)
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:** To date, CHA has completed the following activities to plan for the implementation of authorizing qualified owners/property managers to perform annual inspections:
 - Performed Asset Management Reviews and developed risk ratings for all PRA properties to determine which owners/property managers are qualified to do annual inspections;
 - Began creating process flows and developing policy and procedures to be followed by qualified owners/property managers to ensure annual inspections are done correctly;
 - Identified those owners who currently use Yardi, CHA's system of record;
 - Set up security groups to allow qualified owners/property managers access to YARDI to perform annual inspections, and to ensure they have the proper level of system access.
 - By the end of 2013 CHA plans to select two qualified owners/property managers to pilot this new initiative.

In FY2014, CHA anticipates allowing 11 additional qualified owners/property managers with 276 units to perform annual inspections of PBV participants. CHA's FY2014 anticipated cost savings is expected to be \$16,825 for inspections performed by qualified PRA owners for 276 units.

- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
CE-1: Agency Cost Savings	Total cost of task in dollars (decrease).	In FY2012, CHA spent \$147,828 for PRA annual inspections prior to implementation (2,425 units x \$60.96).	In FY2014, CHA will spend \$131,003 in FY2014 by allowing owners to perform annual inspections. (2,149 units x \$60.96).
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	In FY2012, 1,213 hours of staff time were dedicated for PRA annual inspections prior to implementation (2,425 units x .50 hours).	In FY2014, the amount of staff time dedicated for PRA annual inspections will remain stable at 1,213 hours (2,425 units x .50 hours).

- **Data Collection:** CHA estimates the cost of an annual inspection per unit is \$60.96 yearly based on a \$5.08 monthly PUC. CHA tracks the decrease in costs and staff time associated with allowing qualified owners to perform annual inspections. CHA currently estimates it takes .50 hours to conduct an inspection.
- **Authorization:** Attachment C, Section D (1)(a) and Section D (5) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of Section 8(o)(7) of the 1937 Act, 24 C.F.R. 982.162, and 24 C.F.R. 982 Subpart I.

PBV Contract Commitments with 16-30 Year Initial Terms

(previously 30-Year PBV Contract Commitments)

- **Description and Impact:** To facilitate the expansion of affordable housing opportunities through the use of project-based vouchers, CHA enters into new PRA Program project-based voucher HAP contracts for an initial term between one and 30 years. CHA utilizes MTW authority to enter into contracts that require an initial term of 16-30 years. CHA's relevant contracts include a clause stating that the duration period is pursuant to CHA's MTW authorizations. The impact of this activity is that it will assist developers to obtain better financial terms and help to ensure the long-term availability of quality affordable housing. Through this activity, contracts with an initial term of 16-30 years do not have the 15-year extension option.
- **Implementation Year:** FY2011
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low income families.
- **Status Update:** CHA is currently using this flexibility for 429 PBV housing units. By the end of FY2013, CHA anticipates applying this flexibility to an additional 194 units. In FY2014, CHA anticipates using this flexibility for an additional 292 PBV units projected to be submitted for CHA Board approval.
- **Standard Metrics:**
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Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
HC-1: Additional Units of Housing Made Available	Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0 PBV units made available with 16-30 year contracts prior to implementation.	In FY2014, 292 new PBV units, for a total of 915 PBV units, with 16-30 year contracts.

HC-2: Units of Housing Preserved	Number of housing units preserved for households at or below 80% AMI that would otherwise not be available (increase).	0 PBV units preserved with 16-30 year contracts prior to implementation.	In FY2014, 0 PBV units preserved with 16-30 year contracts.
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- **Data Collection:** CHA tracks the number of additional PBV units made available through executed HAP contracts with initial terms of 16 to 30 years.
- **Authorization:** Attachment C, Section D (2)(b) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of Section 8(o)(7) and 8(o)(13) of the 1937 Housing Act and 24 C.F.R. 983 Subpart E.

Acceptance of City Certificates of Occupancy for Initial PRA Inspections
(previously PRA Inspections)

- **Description and Impact:** For the PRA Program, CHA reduces the number of inspections required prior to lease-up of project-based voucher developments that are new construction or substantial rehabilitation. In cases involving such properties, CHA considers Certificates of Occupancy issued by the City of Chicago as evidence of the property's compliance with Housing Quality Standards. CHA will not perform initial inspections on such units prior to entering into the PRA Housing Assistance Payment (HAP) contracts. The anticipated impact of this activity is to reduce cost by reducing the number of inspections conducted by staff, as well as the associated tenant inconvenience in developments that have additional governmental funding such as tax credits and state-financed loans.
- **Implementation Year:** FY2011
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:** Between FY2005 and FY2011, a total of 1,267 initial inspections have been conducted by staff. Since implementation, CHA has placed 328 PBV units in 11 developments under HAP contract utilizing Certificates of Occupancy issued by the City of Chicago Department of Building Inspectors. In FY2014, CHA anticipates adding 207 PBV units in 4 developments under HAP contract utilizing Certificates of Occupancy issued by the City of Chicago Department of Building Inspectors for a savings of \$2,980 (207 units x \$14.40 per year).
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
CE-1: Agency Cost Savings	Total cost of task in dollars (decrease).	In FY2011, CHA spent \$5,054 for initial PRA inspections (351 units x \$14.40 per year).	In FY2014, CHA will spend \$0 on initial PRA inspections.
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	In FY2011, 176 hours of staff time were dedicated to initial PRA inspections for new construction and substantial rehab units (351 units x .50 hours).	In FY2014, 0 hours of staff time will be dedicated to initial PRA inspections for new construction and substantial rehab units.

- **Data Collection:** CHA estimates the cost of conducting initial PRA inspections per unit is \$14.40 yearly based on a \$1.20 monthly PUC. CHA tracks the decrease in costs and staff time associated with accepting Certificates of Occupancy issued by the City of Chicago for initial inspections. CHA currently estimates it takes .50 hours to conduct an inspection.
- **Authorization:** Attachment C, Section D(7)(d)(ii) of CHA's Amended and Restated MTW Agreement, which waives certain provisions of Section 8(o)(8) of the 1937 Housing Act and 24 C.F.R. 982 Subpart I.

Two-Year Requirement for PBV Participant Transition to Housing Choice Voucher

- **Description and Impact:** Under the PRA program, CHA reduces the turnovers in project-based voucher developments by allowing families only to receive a Housing Choice Voucher after two years of occupancy rather than one year, except for tenants currently residing in a supportive housing unit. Supportive housing units are exempt from the two-year tenancy requirement in cases where families who graduate from their supportive services program(s) before two years wish to move to traditional family housing. In those cases, the family would be issued a tenant-based voucher and the unit would become available for another family in need of supportive services. The impact of this activity is reducing PBV unit turnover and providing stability as an incentive to developers and property owners to participate in the PRA program. Moreover, this also assists PBV developments reduce turnover costs.
- **Implementation Year:** FY2011
- **Statutory Objective:** MTW Statutory Objective III: Reduce costs and achieve greater cost effectiveness in federal expenditures.
- **Status Update:** All non-supportive housing PBV HAP contracts executed are subject to the two-year tenancy requirements. By the end of FY2013, it is anticipated that approximately 33 PRA HAP contracts totaling 609 PBV units will have new program participants that will be eligible for Housing Choice Vouchers after two years of occupancy. In FY2014, CHA anticipates applying the two-year tenancy requirement to 10 new HAP Contracts totaling 259 PBV units.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
CE-1: Agency Cost Savings	Total cost of task in dollars (decrease).	In FY2010, CHA spent \$567 (1 transfer x \$567) to transfer tenants from PBV units to tenant-based vouchers in 2010.	In FY2014, CHA estimates spending \$0 to transfer tenants from non-supportive PBV units to tenant-based vouchers in FY2014.
CE-2: Staff Time Savings	Total time to complete the task in staff hours (decrease).	In FY2010, CHA spent 10.5 staff hours (1 transfer x 10.5 staff hours per transfer) to transfer tenants from PBV units to tenant-based vouchers.	In FY2014, CHA estimates spending 0 staff hours (0 transfers x 10.5 staff hours per transfer) to transfer tenants from non-supportive PBV units to tenant-based vouchers.

- **Data Collection:** CHA tracks the number of transfers within 1-2 years of initial occupancy from non-supportive PBV units to tenant-based vouchers and associated staff time and cost savings. CHA also tracks the number of PBV units with the two-year tenancy requirement.
- **Authorization:** Attachment C, Section D (7) of CHA’s Amended and Restated MTW Agreement which waives certain provisions of 24 CFR 983.

Payments During Initial Occupancy/Leasing for New Construction and Substantially Rehabilitated Properties

- **Description and Impact:** To provide an incentive for participation in CHA’s PRA Program and to ensure the long-term viability of newly constructed and substantially rehabilitated properties, CHA provides vacancy payments, as determined necessary on a project by project basis, during the initial operating lease-up period. Such an approach is consistent with practices in the affordable housing industry (e.g., initial operating reserve for tax-credit properties, provision of operating subsidy for mixed-finance and public housing properties, and allowable vacancy payments from execution of contract to initial occupancy in the Moderate Rehabilitation Program). These payments allow new developments to maintain a positive cash position in meeting operating expenses when all of the PBV units are not leased.

CHA is authorized to make payments for a period not to exceed 90 days from the execution of the HAP contract. These vacancy payments are equal to 50% of the contract rent for the initial 60 days of the vacancy. CHA may determine that there is a reasonable opportunity to refer an applicant from its waiting list and may elect to pay an additional vacancy payment of 100% of the contract rent for the additional 30 days. Under no circumstances will the vacancy payments exceed the 90-day period. Payments are contingent on the owner demonstrating compliance with program rules, including taking all feasible actions to fill the vacancies and not rejecting eligible applicants except for good cause acceptable to CHA. Further, CHA does not compensate landlords for units that receive funding from another source.

- **Implementation Year:** FY2012
- **Statutory Objective:** MTW Statutory Objective I: Increase housing choices for low income families.
- **Status Update:** As of August 2013, the total cost of issuing vacancy payments is \$65,000. CHA is currently using this flexibility for 5 developments totaling 30 PBV units. CHA anticipates paying an additional \$45,000 for approximately 15 PBV units in 4 developments for the remainder of FY2013. In FY2014, CHA estimates using this flexibility on 39 PBV units in 10 developments for a potential cost of \$82,500.
- **Standard Metrics:**

Standard Metric	Unit of Measurement	Baseline	2014 Benchmark
HC-1: Additional Units of Housing Made Available	Number of new housing units made available for households at or below 80% AMI as a result of the activity (increase).	0 PBV units made available through vacancy payments during initial leasing prior to the implementation of the activity.	39 additional PBV units in 10 developments made available through vacancy payments during initial leasing in FY2014.

- **Data Collection:** CHA tracks the number of PRA developments and number of units that are made available through vacancy payments during initial leasing as well as the associated costs.
- **Authorization:** Amendment No. 6 to CHA’s Amended and Restated MTW Agreement which authorizes implementation of approved local, non-traditional activities using MTW funds.

Funding Supportive Services for Project-Based Voucher Program (This Activity Has Not Been Implemented)

- Description and Impact: CHA is authorized to approve rents that include both the cost of the rental subsidy and the cost of support services. Such rents would be limited to supportive housing developments where an owner providing supportive services loses or is unable to obtain the funding to provide the supportive services, and has exhausted all other options. The costs of the supportive services will be included in the rent payment to the owner. CHA estimated a monthly cost of \$500 per voucher for single households and \$667 per voucher for family households to contribute toward supportive services. Such funding will enhance housing opportunities for families that without such services will not be able to sustain lease compliance and therefore run the risk of becoming homeless.
- Implementation Year: Not Implemented; Approved FY2012
- Statutory Objective: MTW Statutory Objective I: Increase housing choices for low income families.
- Status Update: CHA has determined it will not implement this activity in the future. It will not be included in future annual plans and reports.
- Authorization: Amendment No. 6 to CHA's Amended and Restated MTW Agreement which authorizes implementation of approved local, non-traditional activities using MTW funds.

FY2014 Ongoing MTW Activities			
Ongoing MTW Activity	Description	Statutory Objective	Authorization
Revitalization of 25,000 Units	CHA continues to make progress toward the goal of 25,000 housing units and providing additional housing opportunities for residents.	Increase Housing Options	Attachment D, Paragraph 1 and MTW Agreement, Amendment 3
Reasonable Cost Formula and Methodologies for Rehabilitation	CHA established reasonable cost limitations for rehabilitation activities in place of HUD's Total Development Cost (TDC) limits. The reasonable cost formula enables CHA to minimize cost overages in construction and rehabilitation activities. Pending HUD approval of the proposed expansion of CHA's Reasonable Cost Formula and Methodologies for Redevelopment (as described previously in this amendment), CHA will close out this activity in FY2014.	Increase Housing Options	Attachment C, Section C(16)
Reasonable Cost Formula and Methodologies for Redevelopment	HUD approved the reasonable cost formula for redevelopment in FY2010. The reasonable cost formula helps CHA cover the full cost of public housing in mixed income developments on an annual basis. Pending HUD approval of the FY2014 MTW Annual Plan Amendment, CHA will utilize the reasonable cost formula for redevelopment, which was approved in FY2010, for both redevelopment and rehabilitation projects.	Increase Housing Options	Attachment C, Section C(16)
All Clear Utility Debt Assistance Program	CHA is authorized to offer assistance to eligible CHA residents, in partnership with ComEd, to help clear utility debt so they can be current with their utility bills after receiving assistance through the program.	Self-Sufficiency	MTW Agreement, Amendment 6
\$75 Minimum Rent for Public Housing and HCV Programs	CHA increased the minimum rent from \$50 to \$75 in FY2009.	Reduce Costs and Cost Effectiveness	Attachment C, Section C(11) and Attachment C, Section D(2)

FY2014 Ongoing MTW Activities			
Ongoing MTW Activity	Description	Statutory Objective	Authorization
Public Housing Work Requirement	CHA implemented a work requirement across CHA's public housing portfolio. CHA provides case management and workforce development resources to residents to assist them in fulfilling this requirement.	Self-Sufficiency	Attachment D, Paragraph 21
Office of the Ombudsman	The Office of Ombudsman provides designated staff to address the concerns of public housing residents living in mixed-income communities and serves as a liason between residents and CHA leadership.	Self-Sufficiency	Attachment D, Paragraph 20
Exception Payment Standards	CHA is authorized to apply exception payment standards that may be up to 300% of HUD's published Fair Market Rents (FMRs) for the City of Chicago in order to increase housing options in opportunity areas throughout Chicago.	Increase Housing Options	Attachment C, Section D(2)
Owner Excellence-Acceptance of Passed Annual or Initial HQS Inspection for new Request for Tenancy Approval within 90 days of Passed Date	As part of the HCV Owner Excellence Program, CHA may approve tenancy for a unit that passed an inspection within the previous 90 days for owners participating in the Owner Excellence Program.	Increase Housing Options	Attachment C, Section D(5)
Owner Excellence-Vacancy Payments	As part of the HCV Owner Excellence Program, CHA may provide a modest vacancy payment to eligible owners participating in the Owner Excellence Program who re-lease a unit currently in the HCV program to another HCV participant.	Increase Housing Options	Attachment C, Section D(1)

FY2014 Ongoing MTW Activities			
Ongoing MTW Activity	Description	Statutory Objective	Authorization
Owner Excellence-Biennial Inspections	As another component to the Owner Excellence Program, CHA conducts biennial inspections on qualifying units, as defined by CHA, of eligible owners participating in Owner Excellence Program.	Reduce Costs and Cost Effectiveness	Attachment C, Section D(5)
Exceed the Limit of 25% Project-Based Voucher Assistance in Family Properties	CHA may increase the percent of assisted PBV units in certain projects above the regulatory limit of 25% per family building.	Increase Housing Options	Attachment D, Paragraph 6
Authorization of Qualified PRA Owners/Property Managers to Perform Initial Eligibility Determinations and Reexaminations	CHA allows qualified owners, as defined by CHA, to perform initial eligibility determinations and re-examinations of participants in the PRA program.	Reduce Costs and Cost Effectiveness	Attachment C, Section D(1) and Section D(3)
Authorization of Qualified PRA Owners/Property Managers to Perform Annual Inspections	CHA allows qualified owners, as defined by CHA, to perform annual inspections for PBV units.	Reduce Costs and Cost Effectiveness	Attachment C, Section D(1)and Section D(5)
PBV Contract Commitments with 16-30 Year Initial Terms	To facilitate the expansion of affordable housing opportunities through the use of PBVs, CHA uses MTW authority to enter into HAP contracts for initial terms between 16 and 30 years.	Increase Housing Options	Attachment C, Section D(2)
Acceptance of City Certificates of Occupancy for Initial PRA Inspections	CHA is authorized to accept the issuance of Certificate of Occupancy by the City of Chicago as evidence of the property's compliance with Housing Quality Standards for initial PRA inspections.	Reduce Costs and Cost Effectiveness	Attachment C, Section D(7)

FY2014 Ongoing MTW Activities			
Ongoing MTW Activity	Description	Statutory Objective	Authorization
Two-Year Requirement for PBV Participant Transition to Housing Choice Voucher	CHA reduces turnover in PBV developments by requiring families to occupy the unit for two years, unless and supportive housing unit, before they are eligible for a Tenant-Based Voucher.	Reduce Costs and Cost Effectiveness	Attachment C, Section D(7)
Payments During Initial Occupancy/Leasing - New Construction and Substantially Rehabilitated Properties	CHA provides vacancy payments, as determined necessary on a project by project basis, during the initial operating lease-up period in order to provide an incentive for owner participation and to ensure the long-term viability of newly constructed and substantially rehabilitated properties.	Increase Housing Options	MTW Agreement, Amendment 6

Sources and Uses of Funding

Section VII: Sources and Uses of Funding

This section contains information on planned sources and uses of funding in FY2014.

Planned Sources and Uses of MTW and Other Funds

MTW SOURCES	FY2013 Budgeted	FY2014 Proposed	Variance	%
Low Rent				
Operating Subsidy	151,383,390	\$ 142,683,996	\$ (8,699,394)	(5.7)
Tenant Rental Income	42,928,196	44,615,414	1,687,218	3.9
Investment Income	365,000	350,000	(15,000)	(4.1)
Other Income	1,178,040	1,195,950	17,910	1.5
Capital				
Capital Grant Funds	165,499,239	137,818,592	(27,680,647)	(16.7)
HCV				
Housing Assistance Subsidy-MTW	327,261,230	345,784,067	18,522,837	5.7
Housing Assistance Subsidy- MTW Block Grant	133,246,484	116,033,419	(17,213,065)	(12.9)
Reserve Funds	196,804,956	181,554,047	(15,250,909)	(7.7)
Administrative Fees	25,717,860	28,181,258	2,463,398	9.6
Investment Income	1,110,000	465,000	(645,000)	(58.1)
Other Income	173,606	322,200	148,594	85.6
Total MTW Sources	\$ 1,045,668,000	\$ 999,003,943	\$ (46,664,057)	(4.5)

OTHER PROGRAM SOURCES	FY2013 Budgeted	FY2014 Proposed	Variance	%
Section 8 (Non-MTW)	13,368,440	15,516,127	2,147,687	16.1
Hope VI	12,754,731	9,829,822	(2,924,909)	(22.9)
Other Funding	13,404,563	1,969,027	(11,435,536)	(85.3)
Total Other Program Sources	\$ 39,527,734	\$ 27,314,976	\$ (12,212,758)	(30.9)

GRAND TOTAL MTW & OTHER PROGRAMS	FY2013 Budgeted	FY2014 Proposed	Variance	%
MTW Revenues	\$ 1,045,668,000	\$ 999,003,943	\$ (46,664,057)	(4.5)
Other Program Revenues	39,527,734	27,314,976	(12,212,758)	(30.9)
GRAND TOTAL SOURCES	\$ 1,085,195,734	\$ 1,026,318,919	\$ (58,876,815)	(5.4)

FY2014 MTW Sources Explanations (General Fund):

1. Operating Subsidy calculation is based on 21,290 units and an appropriation funding level of 77%.
2. Tenant Rental projection is based upon occupancy rates, collections and expenditures for each AMP (Asset Management Property).
3. Investment Income proposed budget is based on projected portfolio balances multiplied by current U.S. Treasury Security benchmarks.
4. Other Income estimation based on revenue receipts from the lease of CHA rooftops and other Section 8 miscellaneous revenue sources.
5. Capital funding is based on the projected FY2014 HUD contract award and capital carryover funding from prior year grants of \$63.7 million.
6. Housing Assistance Subsidy (MTW/MTW Block Grant) revenue forecast is based upon the projected number of vouchers. The FY2013 adjusted figures reflect the final HUD approved budget for the HCV Program.
7. Reserve Funds is excess revenue earned over and above the HAP and administrative expenses from the HCV Program.
8. The projected Administrative Fees is income earned for administering the Section 8 (HCV and Mod-Rehabilitation) Programs.

FY2014 Other Program Sources Explanations:

1. Section 8 (Non-MTW) estimation based on 1,276 voucher units in the Mod-Rehabilitation Program and 50 Mainstream voucher units and 682 Veteran's Affairs Supportive Housing (VASH) .
2. Hope VI funding for FY2014 is projected to be spent for non-capital (soft costs) and revitalization activities at ABLA, Cabrini Homes Extension, Rockwell Gardens (City Gardens), StatewayRobert Taylor.
3. Other Funding includes capital grant revenue which will be used for site acquisition at LeClaire Court Extension. Other Funds are also comprised of these non-capital grants: Partnership for New Communities , Department of Justice - ARC Partnership Program, Summer Youth Program and Resident Opportunity and Self Sufficiency Grant (ROSS).

MTW FUNDS	FY2013 Budgeted	FY2014 Proposed	Variance	%
Low Rent				
Administrative	\$ 70,078,528	\$ 70,018,423	\$ 60,105	0.1
Tenant Services	5,630,493	2,666,246	2,964,247	52.6
Utilities	28,379,941	28,468,188	(88,247)	(0.3)
Maintenance	70,171,684	72,676,433	(2,504,749)	(3.6)
Protective Services	26,464,558	28,341,590	(1,877,032)	(7.1)
General Expense	10,998,206	10,247,107	751,099	6.8
Housing Assistance Payments	459,999	460,033	(34)	(0.0)
Interest Expense	1,730,643	-	1,730,643	(1.0)
Equipment	1,995,000	1,720,000	275,000	13.8
Reserve Funds	-	2,136,382	(2,136,382)	1.0
Capital				
Administrative	5,084,231	-	5,084,231	(1.0)
Tenant Services	110,000	-	110,000	(1.0)
Maintenance	19,230,205	560,000	18,670,205	97.1
Interest Expense	17,958,899	9,542,750	8,416,149	46.9
Capital Projects	135,798,172	127,715,842	8,082,330	6.0
Reserve Funds	196,804,956	179,417,665	17,387,291	8.8
HCV				
Administrative	14,855,702	16,663,269	(1,807,567)	(12.2)
Tenant Services	71,111,532	74,505,047	(3,393,515)	(4.8)
Maintenance	278,900	100,000	178,900	64.1
Protective Services	267,833	374,966	(107,133)	(40.0)
General Expense	4,434,128	3,074,976	1,359,152	30.7
Housing Assistance Payments	363,824,390	370,315,026	(6,490,636)	(1.8)
Total MTW Uses	\$ 1,045,668,000	\$ 999,003,943	46,664,057	4.5

OTHER PROGRAMS	FY2013 Budgeted	FY2014 Proposed	Variance	%
Section 8 (Non-MTW)	13,368,440	15,516,127	(2,147,687)	(16.1)
Hope VI	12,754,731	9,829,822	2,924,909	22.9
Other Funding	13,404,563	1,969,027	11,435,536	85.3
Total Other Program Expenditures	39,527,734	27,314,976	12,212,758	30.9

GRAND TOTAL MTW & OTHER PROGRAMS	FY2013 Budgeted	FY2014 Proposed	Variance	%
General Fund Expenditures	\$ 1,045,668,000	\$ 999,003,943	\$ 46,664,057	4.5
Other Program Expenditures	39,527,734	27,314,976	12,212,758	30.9
TOTAL EXPENDITURES	\$ 1,085,195,734	\$ 1,026,318,919	\$ 58,876,815	5.4

FY2014 General Fund Explanations (MTW):

- Administrative expenses include cost for central office staffing and support functions, fringe benefits, consulting and auditing fees and other administrative sundry expenditures.
- Tenant Services cost is based on expenditures for resident services contracts for the Chicago Department of Family and Support Services which include Early Childhood, Youth, Homeless Prevention and Senior Service programs. Educational initiatives such as: City Colleges, Out of School Time and After School Matters. Transitional Jobs, Technology training and other housing and supportive services contracts.
- Utility expense budget reflects projected costs for water, sewer, electricity and gas based on consumption and negotiated contracts with vendors.
- Maintenance projection reflects costs for contracts and services for the upkeep and maintenance of CHA's privately managed properties, environmental testing and remediation costs, as well as, maintenance cost for ITS computer hardware and software.
- Protective Services costs pertain to services provided at CHA's privately managed properties, administrative locations and services provided by the City of Chicago Police Department for targeted patrols.
- General Expense reflects centralized costs for general and environmental liability, property insurance and worker's compensation, along with contingency, HCV portability administrative and collection loss fees.
- Interest Expense for FY2014 represents the debt service principal and interest amount due on capital related Bonds (\$10.5M Principal, \$1.3M Interest).
- Equipment costs pertain to communication servers, hardware, infrastructure, and computer enhancements.
- Capital Project costs are related to the planned rehabilitation and redevelopment activities at CHA's senior, family and scattered site housing.
- Reserve Fund usage is anticipated for capital and non-capital operating cost, construction activity which will include life safety, ADA building upgrades and unit acquisition initiatives.
- Housing Assistance Payments are costs for administering the Section 8 (MTW) Program based on MTW units and MTW Block grant vouchers.

FY2014 Other Program Explanations:

- Section 8 (Non-MTW) administrative budgeted costs for Mod-Rehab Program based on 1,276 vouchers, 50 Mainstream vouchers and 682 Veterans Affairs Supportive Housing (VASH) vouchers.
- Hope VI budgeted costs will be used for housing and supportive services for CHA's residents, capital revitalization projects and rehabilitation activity at the following mixed income properties: ABLA, Cabrini Homes Extension, Rockwell Gardens and Robert Taylor Homes.
- Other Funding includes development and project costs for LeClaire Court Extension. Other Funding consist of administrative cost and funding for housing and supportive services for CHA residents.

Planned Sources and Uses of State or Local Funds

OTHER PROGRAMS	FY2013 Budgeted	FY2014 Proposed	Variance	%
State Funds	5,362,500	3,138,115	(2,224,385)	(41.5)
Total State Program Revenues	\$ 5,362,500	\$ 3,138,115	\$(2,224,385)	(41.5)

OTHER PROGRAMS	FY2013 Budgeted	FY2014 Proposed	Variance	%
State Funds				
Site Acquisition	5,322,500	3,138,115	\$(2,184,385)	(41.0)
Remediation	40,000	-	\$(40,000)	(100.0)
Total State Program Expenditures	\$ 5,362,500	\$ 3,138,115	\$(2,224,385)	(41.5)

FY2014 State Program Narrative:

The FY2014 budgeted amount is based on carryover funding from the Illinois Department of Commerce and Economic Opportunity grant (DCEO). The activity budgeted pertains to the land acquisition at LeClaire Court Extension.

Planned Sources and Uses of the Central Office Cost Center (COCC)

CHA will continue to utilize the Cost Allocation method for allocating central office costs. The Cost Allocation method is in compliance with OMB circular A-87. In line with HUD guidance on "asset management rules and MTW relationships," CHA has implemented a central office cost allocation plan in which the central office costs will be allocated to properties based on an Asset Management Project (AMP) unit to total CHA AMP units. Furthermore, in FY2014 CHA will continue to allocate frontline costs in accordance with CHA's cost allocation plan. More detail on CHA's Local Asset Management Plan is found in the Appendices section.

Use of the Single Fund Flexibility

As a MTW Demonstration program agency, CHA has the flexibility to combine funding sources, specifically the Public Housing Operating Fund, Public Housing Capital Fund and Section 8 Housing Choice Voucher Program funding sources. These funding sources provide CHA with increased flexibility in the design and administration of housing assistance programs for low-income families. During FY2014, CHA will continue to use single fund flexibility to further support the three MTW statutory objectives (cost reduction, resident self-sufficiency and increased affordable housing options) by designing and/or continuing to implement progressive MTW programming, including possible new initiatives related to CHA's final strategic plan. During FY2014, CHA will use capital dollars as well as Section 8 MTW Vouchers from the single fund to support ongoing revitalization activities in an effort to further advance the progress of the original Plan and implement applicable new Plan Forward initiatives.

Through the use of MTW funds, CHA will continue to implement resident service initiatives which connect individuals and families to workforce development and case management programs, including new service initiatives related to Plan Forward. Detailed below are descriptions of specific resident services initiatives made possible through the utilization of CHA's single fund flexibility.

Support to Families in the Process of Being Relocated

CHA provides a variety of support options to families in the process of being relocated from buildings undergoing rehabilitation or redevelopment as part of the original Plan for Transformation. In accordance with the Relocation Rights Contract, CHA provides relocation notices to families impacted by building closures or consolidation and makes move-related payments. Additionally, residents are offered pre-move counseling, HCV mobility counseling, post-move counseling, unit tours, assistance in accessing other necessary services and support for residents in managing their household and adjusting to new communities. CHA also provides packing materials and moving assistance to families who are relocating.

Support Services for Families

CHA currently offers public housing families living in CHA properties or temporarily utilizing a Housing Choice Voucher a variety of case management and workforce development services. These services focus on measurable outcomes, including permanent housing choices, lease compliance, and employment preparation, placement and retention. This model will be restructured in FY2014 to provide services to some additional HCV residents and to better target services to resident needs.

CHA Reserve Balances

CHA maintains reserve balances to fund anticipated future construction and other uses of capital. The 2014 Annual Plan reflects utilizing a significant portion of excess reserves to fund CHA's planned unit acquisition, senior, family and scattered site housing capital maintenance projects, and life safety building upgrades. These life safety upgrades are required in order to comply with City of Chicago building codes. These and other funding sources will support the agency's planned addition of housing units in 2014.

Administrative

Section VIII: Administrative

This section contains applicable information and administrative requirements as listed in Attachment B (Form 50900).

Description of Any Planned Agency-Directed Evaluation of the Demonstration

CHA is not currently engaged in any agency-directed evaluations of its MTW Demonstration Program.

Annual MTW Plan Certification of Compliance

OMB Control Number: 2577-0216
Expiration Date: 12/31/2011

Annual Moving to Work Plan Certifications of Compliance

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

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

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the PHA fiscal year beginning FY2014 hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the PHA and conducted a public hearing to discuss the Plan and invited public comment.
2. The Agency took into consideration public and resident comment before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan;
3. The PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
4. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
5. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
6. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
7. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part
8. The PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
9. The PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.
10. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
11. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
12. The PHA will provide HUD or the responsible entity any documentation that the Department needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58.
13. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
14. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
15. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
16. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments) and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments.).

Attachment B

OMB Control Number: 2577-0216
Expiration Date: 12/31/2011

17. The PHA will undertake **only** activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds **only** for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

18. All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its Plan and will continue to be made available at least at the primary business office of the PHA.

Chicago Housing Authority
PHA Name

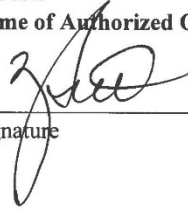
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PHA Number/HA Code

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

Z. Scott
Name of Authorized Official

Chairperson of the CHA Board of Commissioners
Title

Signature



9-17-13
Date

Attachment B
2

Board Resolution

October 9, 2013

Item No. 7

**AUTHORIZATION TO APPROVE THE FY2014 MOVING TO WORK ANNUAL PLAN
(FY2014 MTW Annual Plan)**

To the Honorable Board of Commissioners:

RECOMMENDATION

It is recommended that the Board of Commissioners approve the FY2014 MTW Annual Plan.

The Chief of Staff and the Office of the General Counsel have completed all necessary due diligence to support the submission of this initiative and recommend the approval of this item accordingly.

CORPORATE GOAL

- 1. Provide more housing options for families**
- 2. Assist residents in achieving self-sufficiency**
- 3. Increase the cost-effectiveness of public housing and HCV program administration.**

GENERAL BACKGROUND

On January 6, 2000, the Chicago Housing Authority (CHA) Board of Commissioners approved the Plan for Transformation, which called for sweeping changes in both the administration and operation of CHA. The Plan for Transformation was approved by the U.S. Department of Housing and Urban Development (HUD) and incorporated into a Moving to Work (MTW) Demonstration Agreement, which was executed on February 6, 2000.

On June 26, 2008, CHA executed an Amended and Restated MTW Agreement (Restated Agreement) between itself and HUD, which supersedes the original MTW Agreement. The Restated Agreement extends CHA's participation in the MTW Demonstration to the end of FY2018. CHA's continued participation in the MTW Program is contingent upon adherence to the requirements set out in the Restated Agreement, which includes submission of an Annual Plan. The document represents CHA's FY2014 MTW Annual Plan and details CHA's anticipated activities for FY2014.

Per HUD guidelines, CHA has organized the discussions of activities in the FY2014 MTW Annual Plan under the following Sections: Introduction, General Housing Authority Operating Information, Non-MTW Related Housing Authority Information, Long-Term MTW Plan, Proposed MTW Activities – HUD Approval Requested, Ongoing MTW Activities - HUD Approval Previously Granted, Sources and Uses of Funds, and Administrative.

Each activity CHA seeks to engage in that either uses MTW funds or requires a MTW regulatory waiver, has to meet at least one of the following three MTW Statutory Objectives:

- **MTW Statutory Objective I:** Increase housing choices for low-income families.
- **MTW Statutory Objective II:** Give incentives to families with children where the head of

household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.

- **MTW Statutory Objective III:** Reduce costs and achieve greater cost effectiveness in federal expenditures.

Prior to submission of the FY2014 MTW Annual Plan to the Board, a 30-day public comment period was conducted wherein both residents and the public alike were able to submit comments orally and in writing, regarding the information contained in the proposed Plan. The public comment period ran from August 28 through September 27, 2013. During such time, on September 11, 2013, a public comment hearing was held. Prior to finalizing the FY2014 MTW Annual Plan, CHA gave consideration to comments received during the public comment period.

To this end, CHA has complied with the requirements of the Restated Agreement and HUD regulations regarding annual plans. CHA requests that the Board of Commissioners approve the FY2014 MTW Annual Plan, and the form, CHA Certifications of Compliance with MTW Plan Requirements and Related Regulations. Pending Board approval, CHA will submit the FY2014 MTW Annual Plan to HUD.

The Board action recommended in this item complies in all material respects with all applicable Chicago Housing Authority board policies and all applicable federal (HUD) laws.

The Chief of Staff concurs with the recommendation to approve the FY2014 MTW Annual Plan.

The CEO/President recommends the approval of the FY2014 MTW Annual Plan.

RESOLUTION NO. 2013-CHA-87

WHEREAS, the Board of Commissioners has reviewed the Board Letter dated October 9, 2013 entitled "AUTHORIZATION TO APPROVE THE FY2014 MOVING TO WORK ANNUAL PLAN

THEREFORE BE IT RESOLVED BY THE CHICAGO HOUSING AUTHORITY

THAT, the Board of Commissioners hereby approves the FY2014 MTW Annual Plan, and the form, CHA Certifications of Compliance with MTW Plan Requirements and Related Regulations.

THAT the Board of Commissioners ("Board") authorizes the Chief Executive Officer or his designee to approve any final changes to the FY2014 MTW Annual Plan. Such approval shall constitute conclusive evidence of the Board's approval of any and all such changes.

THAT, this approval of the FY2014 MTW Annual Plan supersedes any and all conflicting language found in prior CHA MTW Annual Plans.

THAT, the Board of Commissioners hereby grants authorization to submit the FY2014 MTW Annual Plan to the U.S. Department of Housing and Urban Development.



Chicago Housing Authority
60 E. Van Buren
Chicago, IL 60605
312-742-8500
www.thecha.org

Board Resolution – FY2014 MTW Annual Plan Amendment



August 13, 2014

Item No. 4

**RECOMMENDATION TO APPROVE CHA'S
PROPOSED MOVING TO WORK ANNUAL PLAN AMENDMENT**

To the Honorable Board of Commissioners:

RECOMMENDATION

It is recommended that the Board of Commissioners approve the attached Proposed FY2014 Moving to Work (MTW) Annual Plan Amendment and grant authorization to submit the document to the United States Department of Housing and Urban Development (HUD) for approval.

The Chief of Staff, MTW Policy & Reporting Department and the Office of the General Counsel, have completed all necessary due diligence to support the submission of this initiative and recommend the approval of this item accordingly.

CORPORATE GOAL

Submission of the Proposed FY2014 MTW Annual Plan Amendment supports the implementation of Plan Forward initiatives and CHA's ongoing efforts to pursue the three statutory objectives of the MTW Demonstration Program.

FUNDING: Not applicable.

GENERAL BACKGROUND

Chicago Housing Authority (CHA) is proposing an Amendment to the FY2014 MTW Annual Plan. A 31-day public comment period was conducted from June 27 through July 28, 2014. Announcements for the public comment process appeared on CHA's website and in the Chicago Defender (June 25 and July 2) and Chicago Sun-Times and Hoy newspapers (June 27-July 3, weekdays only).

During the public comment period, both residents and the public alike were able to submit comments orally and in writing, regarding the information contained in the Proposed FY2014 MTW Annual Plan Amendment. CHA also held three public hearings during the 31-day comment period, on July 8, July 9 and July 15, 2014.

Prior to finalizing the Proposed FY2014 MTW Annual Plan Amendment, CHA gave consideration to comments received during the public comment period.

CHA has complied with the requirements of the Amended and Restated MTW Agreement and HUD regulations regarding annual plans and amendments.

The Board action recommended in this item complies in all material respects with all applicable Chicago Housing Authority board policies and all applicable federal (HUD) regulations.

The Chief of Staff concurs with the recommendation to approve the Proposed FY2014 MTW Annual Plan Amendment.

The CEO recommends the approval of the Proposed FY2014 MTW Annual Plan Amendment and submission to HUD upon Board approval.

Based upon the foregoing, it is recommended that the Board approve the Proposed FY2014 MTW Annual Plan Amendment and grant authorization to the Chief Executive Officer, the Board Chairperson, or their designee to approve any final updates as deemed necessary to submit the Proposed FY2014 MTW Annual Plan Amendment to HUD for approval.

RESOLUTION NO. 2014-CHA-80

WHEREAS, the Board of Commissioners has reviewed the Board Letter dated August 13, 2014 requesting approval of the Proposed FY2014 MTW Annual Plan Amendment, attached hereto;

THEREFORE BE IT RESOLVED BY CHICAGO HOUSING AUTHORITY

THAT the Board of Commissioners hereby approves the Proposed FY2014 Moving to Work Annual Plan Amendment and grants authorization to the Chief Executive Officer, the Board Chairperson, or their designee to make any final updates as deemed necessary.

THAT this approval of the Proposed FY2014 MTW Annual Plan Amendment supersedes any and all conflicting language found in prior CHA MTW Annual Plans.

THAT the Board of Commissioners grants authorization to submit the Proposed FY2014 MTW Annual Plan Amendment to the U.S. Department of Housing and Urban Development upon Board approval. Such approval shall constitute conclusive evidence of the Board's approval of any and all such changes.



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Appendices

Appendices

Rental Assistance Demonstration Program

The Chicago Housing Authority (CHA) is amending its FY2014 Moving to Work Annual Plan in anticipation of becoming a successful applicant of the Rental Assistance Demonstration (RAD) Program. As a result, CHA will be converting select properties to Project-Based Vouchers (PBV) under the guidelines of PIH Notice 2012-32, REV-1 and any successor Notices.

Upon conversion to Project-Based Vouchers, CHA will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6.C & 1.6.D of PIH Notice 2012-32, REV-1 as amended by applicable HUD permissions and CHA's MTW authority. These resident rights, participation, waiting list and grievance procedures are appended to this Amendment. Additionally, CHA is currently and will remain compliant under RAD with all fair housing and civil rights requirements, Gautreaux orders, if applicable, and the requirements of its existing Section 3 Voluntary Compliance Agreement with HUD.

RAD was designed by HUD to assist in preserving affordable housing assets and addressing capital needs of public housing by providing CHA with access to private sources of capital. Please be aware that upon conversion, CHA's Capital Fund Budget will be reduced by the pro rata share of public housing units converted project-based vouchers as part of the Demonstration, and that CHA may also borrow funds to address capital needs in the future. CHA will be conducting physical condition assessments to determine the need for appropriate contributions of Operating Reserves and Capital Funds towards the conversion of properties.

Regardless of any funding changes that may occur as a result of conversion under RAD, CHA will maintain its continued service level as calculated using HUD's MTW Baseline methodology.

Please find specific information related to the public housing developments anticipated for RAD on the following pages.

Public Housing Development	PIC ID	Conversion Type	Total Units Pre-and Post-Conversion	Unit Mix Pre- and Post-Conversion	Pre-RAD Public Housing Unit Type	Capital Fund Allocation of Development
Daniel Burnham Apts	IL002075000	PBV	181	1BR 180 2BR 1	Senior	TBD
Schneider Apts	IL002059000	PBV	174	1BR 174	Senior	TBD
Castleman Apts	IL002054000	PBV	201	OBR 40 1BR 160 2BR 1	Senior	TBD
Ella Flagg Young Apts	IL002060000	PBV	235	1BR 234 2BR 1	Senior	TBD
William Jones Apts	IL002070000	PBV	116	1BR 115 2BR 1	Senior	TBD
Las Americas Apts	IL002063000	PBV	212	1BR 211 2BR 1	Senior	TBD
Alfreda Barnett Duster	IL002042000	PBV	129	OBR 26 1BR 102 2BR 1	Senior	TBD
Elizabeth Davis Apts	IL002050000	PBV	149	OBR 1 1BR 148	Senior	TBD
Lorraine Hansberry Apts	IL002064000	PBV	169	1BR 168 2BR 1	Senior	TBD
Irene McCoy Gaines Apts	IL002062000	PBV	151	OBR 30 1BR 121	Senior	TBD
Albany Terrace	IL002061000	PBV	350	1BR 350	Senior	TBD
The Pomeroy	IL002152000	PBV	104	1BR 104	Mixed-Finance Senior	TBD
The Kenmore	IL002151000	PBV	99	1BR 99	Mixed-Finance Senior	TBD
Britton Budd Apts	IL002144000	PBV	173	OBR 45 1BR 128	Mixed-Finance Senior	TBD
Hilliard 1 Senior	IL002135000	PBV	94	1BR 94	Mixed-Income	TBD

Public Housing Development	PIC ID	Conversion Type	Total Units Pre-and Post-Conversion	Unit Mix Pre- and Post-Conversion	Pre-RAD Public Housing Unit Type	Capital Fund Allocation of Development
Hilliard 1 Family	IL002099000	PBV	59	1BR 12 2BR 27 3BR 10 4BR 10	Mixed-Income	TBD
Hilliard 2 Senior	IL002100000	PBV	94	1BR 94	Mixed-Income	TBD
Hilliard 2 Family	IL002134000	PBV	58	1BR 12 2BR 26 3BR 10 4BR 10	Mixed-Income	TBD
North Town Village 1	IL002028000	PBV	39	1BR 9 2BR 22 3BR 5 4BR 3	Mixed-Income	TBD
North Town Village 2	IL002109000	PBV	40	1BR 9 2BR 3 3BR 26 4BR 2	Mixed-Income	TBD
Fannie Emanuel (Parkview)	IL002065000	PBV	181	1BR 181	Mixed-Finance Senior	TBD
Roosevelt Square	IL002116000	PBV	125	1BR 24 2BR 59 3BR 29 4BR 13	Mixed-Income	TBD
Roosevelt Square II	IL002133000	PBV	120	1BR 50 2BR 31 3BR 37 4BR 10	Mixed-Income	TBD
Jackson Square at West End	IL002120000	PBV	57	2BR 26 3BR 31	Mixed-Income	TBD
West End	IL002107000	PBV	14	3BR 14	Mixed-Income	TBD
West End P2	IL002148000	PBV	65	1BR 5 2BR 9 3BR 43 4BR 8	Mixed-Income	TBD

Public Housing Development	PIC ID	Conversion Type	Total Units Pre-and Post-Conversion	Unit Mix Pre- and Post-Conversion	Pre-RAD Public Housing Unit Type	Capital Fund Allocation of Development
Langston	IL002021000	PBV	29	1BR 9 2BR 11 3BR 4 4BR 5	Mixed-Income	TBD
Quincy	IL002020000	PBV	27	1BR 5 2BR 14 3BR 7 4BR 1	Mixed-Income	TBD
Hansberry Square	IL002127000	PBV	83	1BR 12 2BR 36 3BR 28 4BR 9	Mixed-Income	TBD
Mahalia Place	IL002117000	PBV	54	1BR 8 2BR 23 3BR 19 4BR 4	Mixed-Income	TBD
Coleman Place	IL002139000	PBV	52	1BR 7 2BR 25 3BR 16 4BR 4	Mixed-Income	TBD
Savoy Square	IL002146000	PBV	60	1BR 8	Mixed-Income	TBD

RAD Residents Rights, Participation, Waiting List and Grievance Procedures for PBV
Extracted from PIH Notice 2012-32, REV-1, Section 1.6 (C), adapted for CHA-specific policies

CHA continues to work with HUD to finalize resident policies, including those outlined below, and to comply with RAD requirements. CHA will release updates to the HCV Administrative Plan that outline all RAD-specific policies, as well as a lease or lease addendum for RAD properties, for public comment in the future as required.

- 1. No Re-screening of Tenants upon Conversion.** Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family.

2. **Right to Return.** CHA is not currently planning to substantially rehabilitate any occupied RAD properties that would require off-site temporary displacement of any residents at the time of RAD conversion. If it is later determined that off-site relocation is required for select sites, CHA will comply with all RAD relocation and Right of Return provisions.
3. **Renewal of Lease.** Under RAD, CHA or the owner must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR §983.257(b)(3) will not apply. This provision will be incorporated into the CHA tenant lease or lease addendum, as appropriate. The lease renewal policy, along with other RAD policy updates, will be incorporated into the HCV Administrative Plan for public comment as required.
4. **Phase-in of Tenant Rent Increases.** If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 5 years. To implement this provision, HUD is waiving section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) only to the extent necessary to allow for the phase-in of tenant rent increases. As part of necessary updates to the HCV Administrative Plan, CHA will create a policy setting the length of the phase in period at five years. This policy will be in place at conversion and may not be modified after conversion.

Rent adjustments under the 5-year phase-in schedule are anticipated to occur at annual or interim re-examinations. After this phase-in period, impacted residents will transition to biennial re-examinations (every two years) or triennial re-examinations (every three years), as applicable per CHA's MTW authority, once the calculated income-based TTP is reached. Please refer to CHA's updated Admissions and Continued Occupancy Policy (ACOP) and HCV Administrative Plan for more information regarding requirements and qualifications for biennial and triennial re-examinations.

The below method explains the set percentage-based phase-in an owner must follow according to the phase-in period established. For purposes of this section "standard TTP" refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the "most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058.

Five Year Phase in:

- Year 1: Any re-examination (interim or annual) performed prior to the second annual re-examination after conversion – 20% of the difference between most recently paid TTP and the standard TTP
- Year 2: Year 2 annual re-examination and any interim re-examination prior to Year 3 annual re-examination – 40% of the difference between most recently paid TTP and the standard TTP
- Year 3: Year 3 annual re-examination and any interim re-examination prior to Year 4 annual re-examination – 60% of the difference between most recently paid TTP and the standard TTP
- Year 4: Year 4 annual re-examination and any interim re-examination prior to Year 5 annual re-examination – 80% of the difference between most recently paid TTP and the standard TTP
- Year 5 annual re-examination and all subsequent re-examinations – Full standard TTP

Once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward. As previously stated, upon completion of the 5-year phase-in period, CHA tenants will be transitioned to biennial or triennial re-examination schedules as applicable.

5. **Public Housing Family Self Sufficiency (PH FSS).** Current Public Housing FSS participants will continue to be eligible for FSS once their housing is converted under RAD. Active PH FSS participants will move to CHA's Housing Choice Voucher Family Self Sufficiency (HCV FSS) program after the RAD conversion is completed. CHA will be allowed to use any PH FSS funds granted previously or pursuant to the FY2013 PH FSS NOFA, to serve those FSS participants who live in units converted by RAD and who will as a result be moving to the HCV FSS program. HUD will issue future FSS Notices of Funding Availability and other guidance to facilitate the transition, including FSS coordinator funding eligibility under a RAD conversion.
6. **Resident Participation and Funding.** Resident organizations and representation in place at CHA properties prior to the RAD conversion will continue to be managed and recognized in accordance with current CHA policies and HUD regulations.
7. **Resident Procedural Rights.** The following items will be incorporated into both CHA's HCV Administrative Plan and the owner's lease (including the required lease or lease addendum), as applicable.
 - a. **Termination Notification.** CHA's termination procedure for RAD will provide adequate written notice of termination of the lease. As required, CHA will develop a termination policy which will be included in updates to the HCV Administrative Plan to be released for future public comment.
 - b. **Grievance Process.** For issues related to tenancy and termination of assistance, CHA will provide an opportunity for an informal hearing. As required, CHA will develop a grievance policy that incorporates essential components of the current public housing grievance process as well as required RAD provisions. CHA RAD grievance policies will be outlined in the updates to the HCV Administrative Plan to be released for future public comment.
8. **Earned Income Disregard (EID).** Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent 5-year phase-in, as described in Section 1.6.C.4 (item #4 herein); instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

Under the Housing Choice Voucher program, the EID exclusion is limited to only persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to only disabled persons is waived. The waiver and resulting alternative requirement only applies to tenants receiving the EID at the time of conversion. No other is covered by this waiver.

Other Miscellaneous Provisions for RAD PBV Conversions

Extracted from PIH Notice 2012-32, REV-1, Section 1.6 (D), adapted for CHA-specific policies

1. **Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** CHA agrees to comply with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work.
2. **Additional Monitoring Requirement.** CHA's Board will approve the operating budget for the covered project annually in accordance with HUD requirements.

3. **Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** Under existing PBV program rules, projects that qualify as “existing housing” under 24 CFR § 983.52(a) are not subject to Davis-Bacon (prevailing wages, the Contract Work Hours and Safety Standards Act, and other related regulations, rules, and requirements) or Section 3 (24 CFR Part 135). However, the Davis-Bacon Act and Section 3 shall apply to all initial repairs that are identified in the Financing Plan to the extent that such repairs qualify as construction or rehabilitation, regardless of whether the project qualifies as “existing housing.” Developmental requirements under 24 CFR §983.154 and fair housing provisions under 24 CFR § 983.152(c)(vi) continue to apply.⁶
4. **Administering Wait Lists.** CHA’s current wait list administration policies will apply to RAD properties. For senior-designated properties, including mixed-finance senior properties- site-based waiting lists existing prior to the conversion will continue to be managed under RAD. For mixed-income RAD properties, CHA will continue to manage leasing through the Public Housing Community-Wide (Family Housing) wait list. Families with a remaining Right of Return will maintain priority in accordance with the Relocation Rights Contract. As applicable, Tenant Selection Plans (TSP) in place for individual properties prior to the RAD conversion will remain and will continue to determine applicant eligibility.
5. **Mandatory Insurance Coverage.** The property shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed property of a project, except with the written approval of HUD to the contrary.
6. **Agreement Waiver.** There will be no Agreement to Enter into a Housing Assistance Payments (AHAP) contract. Therefore, all regulatory references to the Agreement (AHAP), including regulations under 24 CFR Part 983 Subpart D are waived.
7. **Future Refinancing.** CHA (or owner) must receive HUD approval for any refinancing or restructuring of permanent debt within the HAP contract term to ensure the financing is consistent with long-term preservation. (Current lenders and investors are also likely to require review and approval of refinancing of the primary permanent debt.)
8. **Administrative Fees for Public Housing Conversions.** For the initial Calendar Year in which a property’s assistance has been converted, RAD PBV properties will be funded with public housing money. Since the public housing funding will not have been transferred to the Tenant Based Rental Assistance (TBRA) account and since this funding is not Section 8 assistance, the Annual Contributions Contract (ACC) between CHA and HUD will cover the project units, but be for zero dollars. For this transition period, the ACC will primarily serve as the basis for covering the units and require CHA compliance with HUD requirements, but it will not be (as it is in the regular PBV program) the funding vehicle for the PBV RAD vouchers. Given this, and given the fact that CHA will be receiving full public housing funding for the PBV units during this transition period, CHA will not receive ongoing Section 8 administrative fee funding during this time.

Generally, CHA receives ongoing administrative fees for units under a HAP contract, consistent with recent appropriation act references to "Section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Responsibility Act of 1998"

⁶ Applicable to projects with nine or more units.

and 24 CFR 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and CHA will not receive Section 8 ongoing administrative fees for PBV RAD units.

After this transition period, the ACC will be amended to include Section 8 funding that corresponds to the units covered by the ACC. At that time, the regular Section 8 administrative fee funding provisions will apply.

Site Selection and Neighborhood Standards

CHA does not intend to transfer RAD assistance to another location; therefore, specific site and neighborhood standards do not apply at this time. However, as authorized under RAD, CHA reserves the right to transfer the HAP contract, RAD Use Agreement, and all or part of the rental assistance provided under RAD to another property at initial conversion or after 10 years from the effective date of the initial HAP contract. If necessary, CHA's MTW Annual Plan will be amended at the appropriate time to accommodate any programmatic changes related to planned transfers.

Relocation Plans

CHA is not currently planning to substantially rehabilitate any occupied RAD properties that would require off-site temporary displacement of any residents at the time of RAD conversion. As required, CHA will submit the Accessibility and Relocation Plan Checklist, indicating there are no plans for RAD properties that require relocation, along with the Financing Plan for each property. If it is later determined that off-site relocation is required for select sites, CHA will provide an updated checklist notifying HUD of planned changes and comply with RAD relocation and RAD Right of Return provisions.

Public Comments

PUBLIC COMMENTS
CHA FY2014 MTW Annual Plan
Public Comment: August 28 - September 27, 2013

ROW #	INDIVIDUAL OR ORGANIZATION	COMMENT	CHA RESPONSE
1	Baez, Maria	No demolition at Lathrop, and I don't like the Plan.	Any proposed demolition or disposition at Lathrop is pending the conclusion of the HUD Section 106 process, the finalization of the master plan, and approval by CHA's Board of Commissioners and HUD. CHA will follow all applicable regulations prior to submitting any demolition or disposition application to HUD for approval.
2	Brown, Julie BPI	Exception payment standards (page 64) are an important tool for providing public housing families with access to areas of opportunity with high-performing schools, lower crime, excellent public transit connections, and a variety of employment opportunities. In Chicago rent for modest units in opportunity areas frequently exceeds city-wide FMR standards. While we understand the need to assess the potential impact of lowering exception payment standards, we urge CHA to also consider carefully reviewing whether units outside opportunity areas, which receive the majority of Section 8 funds, have rents in line with nearby market units.	Thank you for your comment. CHA will continue to evaluate rent structures in and out of opportunity areas as it implements key initiatives of Plan Forward.
3	Brown, Julie BPI	The MTW Annual Plan states (page 15) that the new real estate acquisition program will acquire offsite housing units and multifamily properties "primarily in neighborhoods with low percentages of CHA-subsidized housing that are accessible to jobs and public transportation." We recommend that CHA actively seek to acquire housing units and multifamily properties in Opportunity Areas (which have been previously agreed upon and defined), with a priority on Chicago's North Side where CHA has a much smaller portfolio, as well as in Gautreaux General Areas, so that CHA can continue progress towards its goals and those of the Gautreaux court orders.	Thank you for your comment. CHA will consider this input as it implements the new real estate acquisition program.
4	Brown, Julie BPI	With respect to the joint CHA-City mixed use development on former Harold Ickes Homes land (page 16), the Annual Plan should clarify that if residential uses are developed on that land, it will include public housing.	The former Harold Ickes site is currently planned for redevelopment as a future mixed-income, mixed-use site, including public housing units. CHA has updated the language in the annual plan.
5	Brown, Julie BPI	We urge that the Working Groups for LeClaire and Ickes be reconvened promptly to discuss the plans for those developments described in the annual plan (page 16).	Thank you for your comment.
6	Brown, Julie BPI	With respect to the planned scattered site demolitions (page 18), CHA should replace the lost General Area scattered site unit (10322 S. Avenue M) with a public housing unit in a General Area. This is a Gautreaux remedial unit and should be replaced with a remedial unit.	Thank you for your comment. As you know, CHA is committed to developing and acquiring housing in general areas.
7	Brown, Julie BPI	For two years, CHA has signaled in its Annual Plan an intention to move its resident services program in a new direction, but has provided little information regarding that shift. We urge CHA to provide a clear description of its new services system in the final FY2014 Annual Plan.	CHA has released several Requests for Proposals in recent months, including one for administration of the Family Self-Sufficiency program and one for regional service providers to implement the next phase of what is currently called the FamilyWorks program. These RFPs provide significant information regarding the 2014 service model, and further information will be forthcoming as the transition to the new model occurs on January 1, 2014.

PUBLIC COMMENTS
CHA FY2014 MTW Annual Plan
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ROW #	INDIVIDUAL OR ORGANIZATION	COMMENT	CHA RESPONSE
8	Clement, Savannah Housing Policy Associate LATINO POLICY FORUM	I'm here on behalf of the Latino Policy Forum. The forum is the only organization in the Chicago area that facilitates the involvement of Latinos at all levels of public decision making, and we conduct analysis. Our overall goals are to improve educational outcomes, adequately report housing, promote just immigration policies, and engage in diverse opportunities.	Thank you for your comment.
9	Clement, Savannah Housing Policy Associate LATINO POLICY FORUM	We will be submitting comments in writing. And I want to take this opportunity to highlight some of our comments. Namely, those of Spanish language access, resources and outreach, cultural competency, equitable access for Latino CHA Program. The Latino community makes up a third of Chicago's population, provides 20% for public house and Housing Choice Vouching Program, yet Latinos are only participating in about half that rate, covering around 10% in both of these programs. Based on US. Census data, more than half of Latino housing are renters, and more than half of Latino renters are rent burdened.	Thank you for your comment. CHA will consider the input as the agency uses data and best practices to inform its outreach efforts.
10	Clement, Savannah Housing Policy Associate LATINO POLICY FORUM	Based on the Moving To Work Annual Plan, CHA plans to demolish cites from South Chicago. The CHA is required by federal law to affirmatively have fair housing and demolition of public housing units. We strongly encourage the CHA to provide replacement public housing units on a one-to-one basis in areas such as Lathrop Homes, Cabrini Green Row Houses, and LeClaire Houses.	Thank you for your comment.
11	Clement, Savannah Housing Policy Associate LATINO POLICY FORUM	The Latino community makes up nearly a third of the City of Chicago population and comprises about 20 percent of the income eligible population for both Public Housing and the Housing Choice Voucher program; yet this population participates at half the rate it could be-- hovering around about 10 percent for both of the mentioned programs. Based on U.S. Census data more than half of Latino households in Chicago are renters and more than half of Latino renters are rent burden- that is paying more than 30% of their household income towards rent.	Thank you for your comment. CHA continues to work to ensure that affordable, subsidized housing is made available to Chicago's low-income families regardless of race, religion or sexual orientation. CHA will continue to make data-driven decisions regarding its policies in maintaining its waitlists and occupancy.
12	Coleman, Deborah Former Harold Ickes Resident	This plan is unacceptable, CHA gets millions of dollars each year for the Harold Ickes Replacement housing. No housing has been built yet. There should be no land swap. The people need low income housing. We also need each other. Take next year to rebuild our homes. We need the Ickes replacement housing built next year.	The former Harold Ickes site is currently planned for redevelopment as a future mixed-income, mixed-use site, including public housing units. CHA plans to issue a joint RFP with the City of Chicago in FY2014. Even if the proposed disposition does occur, there is sufficient land available to meet the Right of Return of current identified families who want to return to the former Ickes site.
13	Curtis, Chris	Good evening, everybody. I'm Chris Curtis. I'm came from Ickes. I have a question for the panel. The plan sounds good, but going into 2014, what about the residents that left Ickes? The land that's sitting there, it was told that -- it was told that it was supposed to be ground breaking, but they stopped ground breaking. I want to know why they did stop ground breaking? What is the motive -- hold up for the ground breaking? Also, did the residents get the opportunity to come back to Ickes, where the 300 units that was given by Ickes? Will please somebody help us with that question tonight? I want to ask a question because I came from Ickes land that's sitting there. Why they stop the land it was being renovated. Can somebody answer that question for me? Answer the question.	The former Harold Ickes site is currently planned for redevelopment as a future mixed-income, mixed-use site, including public housing units. CHA plans to issue a joint RFP with the City of Chicago in FY2014. Even if the proposed disposition does occur, there is sufficient land available to meet the Right of Return of current identified families who want to return to the former Ickes site.

PUBLIC COMMENTS			
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Public Comment: August 28 - September 27, 2013			
ROW #	INDIVIDUAL OR ORGANIZATION	COMMENT	CHA RESPONSE
14	Diaz, Evelyn J., Commissioner DFSS	The City of Chicago looks to CHA as a key partner in Plan 2.0, Chicago's updated plan to prevent and end homelessness. Plan 2.0 projects a need for more than 500 short-to-medium-term housing units for families and more than 900 subsidized, affordable units for homeless families. Additionally, the City of Chicago and CHA partner on HUD's Dedicating Opportunities to End Homelessness (DOEH) initiative.	Thank you for your comment. CHA values its partnership with the City of Chicago's Department of Family and Support Services to serve Chicago's homeless population.
15	Diaz, Evelyn J., Commissioner DFSS	The Department of Family and Support Services strongly supports CHA's proposal to create locally-administered flexible rental subsidy to support families in transitioning from long-term subsidies as they achieve self-sufficiency goals (Annual Plan, page 45). This type of subsidy is a critical investment in both the Plan 2.0 and DOEH goals of increasing access to medium-term housing and subsidized, affordable housing for families in need and is an important tool that diversifies the menu of options available for them. We look forward to working closely with the CHA and other key partners to expand affordable housing options for Chicagoans in need.	Thank you for your comment. CHA values its partnership with the City of Chicago's Department of Family and Support Services to serve Chicago's homeless population.
16	Dorothy Jennings	I have lived in the Harold Ickes Homes for over 30 years. The Ickes was our community. It provided us access to transportation, shopping and grocery stores especially for our seniors. Many of us spent our whole lives here and also worshipped in this community. Now we have been displaced into communities where we are strangers. Far from our support networks. We have been forced into neighborhoods that are food deserts. I just want to come back home! This neighborhood and the people we lived with, was our community and we want to return. CHA should be building communities not destroying them. I worked in the Ickes for 14 years during my residency. With the demolition of the Ickes, went the loss of my job. CHA, the city and the mayor have not shown any regard to the residents of the Ickes. The 2014 CHA Moving to Work Plan is unacceptable. CHA must include the building of the Harold Ickes Homes next year. The city needs to put the same time, energy and excitement into restoring our community as they are putting into building the DePaul Arena and hotel.	The former Harold Ickes site is currently planned for redevelopment as a future mixed-income, mixed-use site, including public housing units. CHA plans to issue a joint RFP with the City of Chicago in FY2014. Even if the proposed disposition does occur, there is sufficient land available to meet the Right of Return of current identified families who want to return to the former Ickes site.
17	Giacometti, Dena	My name is Dina. This is Bianca, and we are neighbors of Lathrop Homes. We just want to say that we think it's ridiculous to demolish the beautiful buildings that are standing there now to put in market rate homes that people cannot afford in that area anyway. There is lots of foreclosure signs, and to put in retail stores who pay their employees \$10 an hour, if you pay somebody \$10 an hour, they can't afford to live in their own neighborhood. And that's -- and bussing people in to work somewhere is a modern definition of slavery these are our neighbors, and these are our friends. We don't want you to move them out or do demolition.	Thank you for your comment. The Lathrop redevelopment planning process has involved extensive discussions with and input from a wide variety of stakeholders, including residents and the broader community. Finalization of plans with key stakeholders and continuation of the HUD Section 106 process are ongoing. The current proposed plan for the mixed-income development provides income diversity and balances a significant amount of preservation of existing buildings with new construction. Any proposed demolition or disposition at Lathrop is pending the conclusion of the HUD Section 106 process, the finalization of the master plan, and approval by CHA's Board of Commissioners and HUD. CHA will follow all applicable regulations prior to submitting any demolition or disposition application to HUD for approval.

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18	Hendrix, Loretta Former Ickes Resident	I am former resident of the Harold Ickes Homes, I have the right to return. The 2014 Moving to Work Plan does not say when the Ickes Homes will be developed. The plan needs more detail, with some units being completed by 2014. I have been displaced since 2002. I have lived in the Ickes all my life. I want to return back to my community. The development I live in now is not safe. I never felt unsafe in the Ickes. I urge you to build the 300 public housing units so me and other Ickes residents can return home.	The former Harold Ickes site is currently planned for redevelopment as a future mixed-income, mixed-use site, including public housing units. CHA plans to issue a joint RFP with the City of Chicago in FY2014. Even if the proposed disposition does occur, there is sufficient land available to meet the Right of Return of current identified families who want to return to the former Ickes site.
19	Jacobs, Marguerite	I'm from Altgeld Gardens, and I know you're doing the rebuilding of the place, but we are having problems with our parking. When you are making this, we want to look at, when you came in, now we seem to have no parking space. The police are ticketing the cars. We have to be out by 6 am. We can't have company. I feel like that is being -- we have -- we are being harassed. They argue about the police so much. Bernadette does the best she knows how, but how do we, the people, the police, and CHA get together and stop taking people's cars? We are being ticketed and then you get the three tickets your car is gone. How when I come into housing, I have a car. I've been there five to two years, I don't have a car. We need more parking spaces. We need to do something about the parking. It's beautiful. The place is beautiful, the building, your building. But by the time five years, we don't have a car. I feel like we are being harassed.	The master planning process is evaluating current road and parking conditions at Altgeld/Murray, which will be addressed in the final master plan. Please contact the property management office for the appropriate CHA representative to discuss current parking concerns.
20	Johnson, Cheryl	My name is Cheryl Johnson. I'm from Altgeld. I just want to put on the record that with the community development plan process that you're going through, the community did not agree with the A-B Plan that was projected. We want to see the C plan when we come back together on September 19. I don't see a vision. A boulevard going straight to the lake, because it goes back to the original plan for transformation, when they want to build waterfront property in our area that will give you direct access to that process, start happening and the residents never agreed to that. But on the other note, I want to talk about why we are here. The type -- the title where you come from, Chicago Housing Authority. You're in the business to provide housing, not take away housing. I mean, if you see that you have 40,000 people families, that represents a whole lot of people that need housing. You need to do one-to-one replacement. We need housing. You -- it seems like it's a crime against humanity what you're doing, you know?	As part of the master planning process underway at Altgeld/Murray, a Town Hall meeting was held on September 3, 2013, where various design concepts were presented to the residents for their feedback and comments. This feedback informed the Preferred Design Concept that was presented and well received by residents at the Town Hall meeting on September 30, 2013.
21	Johnson, Cheryl	I mean, this is -- this is just criminal to see people without a place to live. That's not right. That's just not right. That's just not right, ya'll. Whatever decision, it needs to be inclusive of what the residents are saying. Because the developer is going to walk away. They are only involved \$100,000, but they walk away with \$100,000,000. That's criminal. Who is accountable for that? You get money for vacant and off-line properties that nobody even lives in. That justifies the great need for why you should do one-to-one replacement. We are not here to be an adversary. We want to be your ally, but you're not opening your hand. You're not opening up your doors to really listen to what everybody is saying here. We need affordable housing in the City of Chicago. Thank you.	Please see response for Comment #20.

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22	Kirby, Titus	My name is Titus Kirby. I'm a resident of Lathrop. I'm here on behalf of Lathrop and all the other CHA developments that are having issues. Lathrop Home Development is run by Chicago Housing, located on the north side of Chicago, is a diverse community on the Chicago River, sitting on more than 30 acres of prime land. Lathrop had 925 units, but less than 200 families remain, with the promise they will rehab. They have not rehabbed. Today, the CHA has highly developed Lathrop, by demolishing half of the historic buildings and replacing it with market housing. We are going to lose 525 public housing units from the north side. The development plan is the wrong plan for Lathrop, and I'm going to tell you why. There are four reasons this plan is wrong for the plan for Lathrop. First, Lathrop is physically in good shape, structurally sound, and easy turn around to rehabilitate. These apartments are not in a condition where they cannot be rehabbed. Demolition is not justified.	Thank you for your comment. The Lathrop redevelopment planning process has involved extensive discussions with and input from a wide variety of stakeholders, including residents and the broader community. Finalization of plans with key stakeholders and continuation of the HUD Section 106 process are ongoing. The current proposed plan for the mixed-income development provides income diversity and balances a significant amount of preservation of existing buildings with new construction. Any proposed demolition or disposition at Lathrop is pending the conclusion of the HUD Section 106 process, the finalization of the master plan, and approval by CHA's Board of Commissioners and HUD. CHA will follow all applicable regulations prior to submitting any demolition or disposition application to HUD for approval.
23	Kirby, Titus	Second, Lathrop Homes is a mixed-income community already. We have working class people of all varieties as well as seniors and others on fixed income. Lathrop is located within one of the most affluent communities in Chicago. If you go north, south, east, west of Lathrop, you will find homes that are well worth over two million dollars surrounding us. The biggest concern is in this area is to preserve Lathrop as public housing. Third, it's being driven by the wrong thing, that's money. As far as residents living there is concerned, what's driving the planning process is developers and their desire to make profit. Lathrop Home in the city of Chicago sits on prime land and the developers see an opportunity to include expensive market-rate housing on free land using a bunch of public housing. The planning process, for house side.	Please see response to Comment #22.
24	Kirby, Titus	It's a planning process, you have the developers and lawyers drafting the plan that serve their interest but not -- does not include the input of Lathrop residents or our neighbors as a whole. To say it bluntly, their plan is money driven. There is no other way to look at it. There is no need that you will try changing Lathrop except that you see a way to make money off those changes. Numbers 4, 5.	Please see response to Comment #22.
25	Kirby, Titus	This development -- this redevelopment plan is based on the promises that CHA and this department have particularly made but never kept in the past. The same department, Related Midwest, made similar promises to residents in 2007, and over \$56,000 in public funds were given to developers. The developer promised 775 new replacement housing units, but only built 235 today, and that's more than seven years later. While in the future, why do we believe the future would be any different than the past? We heard the same promise, but what we heard after demolition, they're the same promises that you told residents of Robert Taylor, Stateway Gardens, Ickes, LeClaire Courts, and countless other CHA communities. We have seen and heard today how those promises have not played out. No demolition, no market rate for Lathrop. All these promises have not been heard.	Thank you for your comment.

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26	Kirby, Titus	I am a resident of Julia C. Lathrop Homes. I am here on behalf of Julia C. Lathrop Homes and all other CHA developments that are having the issue that is about to come to Lathrop. Lathrop Homes is a development run by the Chicago Housing Authority located on the north side of Chicago. It is a diverse community on the Chicago River sitting on more than 30 acres of prime land. Lathrop is 925 units, but less than 200 families remain because the Chicago Housing Authority stopped leasing apartments over the last 13 years with a promise they would rehab them, but they have not. Today, the CHA has hired a DEVELOPER to redevelop Lathrop by demolishing nearly half of Lathrop's historic buildings and replacing them with market housing, and converting other buildings to market rate housing as well. The net result is that we are going to lose 525 public housing units from the north side if this plan is allowed to move forward. The Developer's Plan is the wrong plan for Lathrop and I am going to tell you why.	Please see response to Comment #22.
27	Kirby, Titus	There are four reasons this Plan is the wrong plan for Lathrop. 1st--According to the Chicago Housing Authority's own independent engineering study, the apartments at Lathrop are physically in very good shape. They are structurally sound and easily turned around and rehabilitated. These apartments are NOT in a condition where they can't be rehabbed. Demolition is not justified.	Please see response to Comment #22.
28	Kirby, Titus	2nd-Lathrop Homes is a mixed income community already--- we have working class people of all varieties, as well as seniors and others on fixed incomes. Lathrop is located within one of the most affluent communities in Chicago. If you go to the north, south, east or west of Lathrop you have homes that are worth over \$2 million dollars surrounding us. The best way to preserve a mixed income, integrated community in this rich area is to preserve Lathrop as public housing.	Please see response to Comment #22.
29	Kirby, Titus	3rd-The Lathrop redevelopment plan is being driven by the wrong thing, and that is money. As far as the residents of Lathrop are concerned, what's driving this planning process are the DEVELOPERS and their desire to make a profit. Lathrop Homes sits on the Chicago River on prime land, and the developers see an opportunity to create expensive, market rate housing on free land, using a bunch of public money. The planning process was geared more to outside influence than to the residents or neighbors themselves. You have developers, lawyers,.... drafting a plan that serves their interests but does not include the input of the Lathrop Residents or our immediate neighbors as a whole. To say it BLUNTLY this "Plan" is money driven, there is no other way to look at it. There is no NEED that you would try to change Lathrop except that you see a way to make money OFF of those changes.	Please see response to Comment #22.
30	Kirby, Titus	4th-This redevelopment plan is based on promises the CHA and this developer in particular have made but never kept in the past. This same developer--- Related Midwest--- made similar promises to ABLA residents in 2007. Public funds were given Over \$56 million in public funds were given. The developer promised 775 replacement public housing units, but has only built 235 today, and that is more than 7 years later. Why should we believe the future will be different than the past? We've heard these same promises of what will happen after demolished. These are the same promises that you told the residents at Robert Taylor, at Stateway Gardens, at the Ickes and at LeClaire and countless other CHA communities, and we have seen and heard today, how those promises have played out. No demolition. No market rate.	Thank you for your comment.

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31	Levi, Sibi	I'm from Robert Taylor. I would like to speak -- address this land disposition. In 1999, prior to this illegal transformation plan that was forced into action, because of the application was put in late, for one, so it should not even have reached the table. But that's done. You're talking about taking land where there were 5,000 residents that had a guarantee right of return. I filed a lawsuit in 2004, which guaranteed the right of return for public housing residents across the nation. Now, you're doing land disposition. None of this was in your application for transformation plan originally. None of this was in any plan that was introduced to any of the residents. When Robert Taylor was torn down, there was no new stores on State Street. Robert Taylor has been torn down, and there is nothing new still to that day. So if you want disposition of lands, give the residents something land worthy for what you want. You want to make it a -- make it a piece of land, give up a major piece of land for residents to decide what to use this land for.	Thank you for your comment. Under Plan Forward, CHA's goal is to develop complete, vibrant communities by coordinating public and private investments in non-residential uses including retail/commercial, recreational, educational, and community purposes as well as places of employment. Even if the proposed disposition of portions of Robert Taylor occur, there is sufficient land available to meet the Right of Return of current identified families who want to return to the former Robert Taylor site.
32	Levi, Sibi	You want ideas? I got some that I have no problem giving. When it comes to business ownership, there is not one new business on 43rd Street since I left Robert Taylor. I have a plan to put three resident-owned business districts in the city of Chicago. I would like to offer that plan for you to submit. When you submit your 2014 plan to HUD, submit this resident initiative plan right along with that, and let this be something that the residents can be able to say we know for a fact where resident-owned businesses are because we see them and residents can come from anywhere, and they are welcome to be part of the plan.	Thank you for your interest in entrepreneurship for residents. CHA currently partners with the Chicago Urban League to offer a program that supports residents who have or are looking to start a small business. Residents interested in this program should contact the Chicago Urban League.
33	Levinger, Leah CHI	I'm here for the Chicago Housing Initiative Citywide Coalition. Based on the Plan For Transformation in 2000, CHA has publicly committed to 25,000 replacement public housing units by the close of 2015. This year CHA plans to rebuild only 40. This concerns us. CHA continues to receive about \$40,000 in replacement housing factor funds granted annually. These are funds earmarked by the federal government for rehabilitation of CHA housing and CHA has access to tens of millions in city housing funds, designated to produce replacement housing. While CHA continues to receive these resources, currently at the replacement housing rate, CHA will need to ask for an extension until 2018. That's five years until the current end date approved by HUD and ten years past the scheduled plan for completion. There is a way to us to get back on track, and that way is to -- prioritize rehabilitation, which is a proven cost effective timely strategy for delivering housing on scale.	Thank you for your comment. CHA continues to pursue and consider a variety of strategies in fulfilling its commitment of 25,000 units and providing additional affordable housing opportunities for low-income families.
34	Levinger, Leah CHI	We all know this, because 74% of the units that CHA has brought back online have come back through rehabilitation. New construction has accounted for only 2,580. That's 12% of the units. If we're going to get back on track, finish the plan on time, we have to be talking about rehabilitation. The rehabilitation [Dorchester], you already counted those apartments. Those 36 units you already counted. So to count them again, I have to say is -- it's not ethical. It's not fair or right. When HUD and CHA came and the public came to an agreement about 25,000 replacement units, we were talking about 25,000 discreet housing for 25,000 discreet families. So you cannot count those twice. One last point. The Real Estate Acquisition Initiative, Inc, that's a very innovative idea. You have projected far more units than you have ever delivered. I want to say you cannot count on that as a good idea. Maybe exploring it, but rehabilitation is the proven way.	Thank you for your comment. Please note that the 36 scattered site units at Dante/Harper, which will be replaced with Dorchester Artist Housing, have not been counted toward CHA's 25,000 unit goal.

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35	McDermott, John Housing & Land Use Director New Communities Program Organizer Logan Square Neighborhood Association (LSNA)	In its FY2014 Draft Annual Plan, the Chicago Housing Authority says that it may seek permission for the demolition/disposition of "some or all" of the 925 public housing units at the Lathrop Homes during FY2014. The Logan Square Neighborhood Association has worked with Lathrop residents and neighboring organizations for more than 25 years. The presence of this language about Lathrop in the Draft Annual Plan indicates that the CHA is not listening to Lathrop residents, former residents and many community organizations. The low rise buildings at the Lathrop Homes - now recognized on the National Register of Historic Places - are structurally sound buildings that lend themselves to an excellent renovation. HUD is conducting a Section 106 process on the question of historic preservation at Lathrop that is still underway. Moreover, Lathrop is located in a part of Chicago that has historically had few public housing units. It is surrounded by retail development, job opportunities, good public transit and school opportunities.	Thank you for your comment and continued participation in the Lathrop redevelopment discussion. The Lathrop redevelopment planning process has involved extensive discussions with and input from a wide variety of stakeholders, including residents and the broader community. Finalization of plans with key stakeholders and continuation of the HUD Section 106 process are ongoing. The current proposed plan for the mixed-income development provides income diversity and balances a significant amount of preservation of existing buildings with new construction. Any proposed demolition or disposition at Lathrop is pending the conclusion of the HUD 106 process, the finalization of the master plan, and approval by CHA's Board of Commissioners and HUD. CHA is required by HUD to include any potential demolition or disposition activity in annual plans for public comment. Pending HUD approval of annual plans, a separate demolition or disposition application for specific activity must subsequently be submitted for HUD approval.
36	McDermott, John Housing & Land Use Director New Communities Program Organizer Logan Square Neighborhood Association (LSNA)	The CHA's 2011 Report on Relocation shows that very, very few of the CHA's relocate families are using vouchers in the neighborhoods around Lathrop. In these affluent or gentrifying communities, dedicated "hard" public housing units like the 925 public housing units at Lathrop are essential. The CHA on July 30 released a draft master plan for Lathrop that would eliminate 525 of Lathrop's 925 public housing units. And the CHA does not intend for the Master Plan to include any commitment to replace those units. Until these critical issues are addressed, the CHA's blanket request for permission for demolition & disposition in FY2014 is premature and misguided.	Please see response to Comment #35.
37	Miller, Warren President, Preservation Chicago, and VP, Logan Square Preservation	I'm Warren Miller, president of Preservation Chicago, also vice president of Logan Square Preservation. We are -- both organizations are very concerned about the Lathrop Homes on the City's northwest side. This is the best of the best, guys. I say the same thing is true with Altgeld Gardens, on the City's far south side. Lathrop has -- is built by Hubert Burna, Jan Bura, that was his son and Robert Duvalier. It has an incredible landscape which one -- by one of the world's most famous architects, Jim Jenson. And after looking at three proposals for the National Registry Site, which -- one which was an embarrassment, which was the total clearing of all of the units, over 900 units, on the second proposal which was saving one type of every building, and a third proposal which saved a fragment of the whole development.	Thank you for your comment. The Lathrop redevelopment planning process has involved extensive discussions with and input from a wide variety of stakeholders, including residents and the broader community. Finalization of plans with key stakeholders and continuation of the HUD Section 106 process are ongoing. The current proposed plan for the mixed-income development provides income diversity and balances a significant amount of preservation of existing buildings with new construction.
38	Miller, Warren President, Preservation Chicago, and VP, Logan Square Preservation	Now, after lots of money was spent, lots of studies, lots of consultants, I guess it's all good. At the end of the day we are looking at 60% preservation. Again, I have to tell you 60% is still a failing grade on anybody's mid-term final exam. If you say 50% of a building is a failure, and I think you have an amazing complex. I -- just to the west of Logan Boulevard we have a landmark district. This development is an extension of our boulevard district. I think we are missing a great opportunity if you don't renovate and restore these developments. They are great developments and this is the best of the best. I want to let you know we are here to support you. We are here for you to do the right thing, if you will.	For response, please see Comment #37.

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39	Ms. Santos	<p>Good afternoon. I'm here once again, about the LeClaire Courts. I heard on the news a couple weeks ago how Cicero is coming up, booming in business. I lived in Cicero 23 years, and we as a community never had an opportunity. Have -- what they say about us, but the minute we was out of the area, Cicero is booming now. No, I'm booming too because I'm ready to go home. Like I told you, build my house in Cicero because I put my name on you all's papers saying that you would build and give me the right to return. And I'm going to hold CHA to that. So I know you're not going to be through by June 15, but I'm asking the Lord to keep me on this earth because I want to see my vision come true. I'm going back to Cicero temporarily, but you can tell them to quick knocking at the door and ringing being my bell to stay in Bridgeport permanently because that's not what I want. I stay -- I did what I was supposed to do in public housing. So I know what I want. I want a brand new community like I was promised.</p>	<p>Thank you for your comment. Under Plan Forward, CHA's goal is to develop complete, vibrant communities by coordinating public and private investments in non-residential uses including retail/commercial, recreational, educational, and community purposes as well as places of employment. As stated in the annual plan, CHA anticipates an overall development zone planning process for LeClaire in FY2014.</p>
40	Nelson, Mary	<p>My name is Mary Nelson, and I'm a leader of the One North Side and Chicago Housing Initiative. I'm horrified by the CHA's decision to strip 47,000 families permanently off of this and to deprive them of the chance of affordable housing. I'm not the only one struggling today. There is a growing gap between real income and real rents, which is putting a squeeze on more and more families in Chicago. I'm here to speak about this because as a resident of Myra's Place, a women's transitional housing program serving women who are homeless, and on the waiting list like me, when Chicago housing -- when public housing sits vacant year after year and when publicly-owned lots where public housing used to sit, sits idly year after year, some will give up, some will move too many times to keep up, our current address on file with the CHA, and some of us will pass on.</p>	<p>CHA wait list applicants who requested to be removed, or those who did not respond to CHA housing offers, or those who did not respond to requests for updated information, were removed from CHA's wait lists. In 2012, CHA notified all applicants of a required waitlist update through multiple communication methods including US mail, email, morning news, newspaper notices, community flyers, meetings, and individual phone calls to each applicant's primary, secondary, and emergency contact number. Applicants who did not respond online, by phone or in person to these multiple notices during the 7-week update period, or during the 30-day second chance, were removed from CHA wait lists. Applicants who feel they were removed from the CHA wait list in error can submit documentation to appeal their removal by contacting:</p> <p>CHA Public Housing Waitlist-Occupancy 60 E. Van Buren, 13th flr. Chicago, IL 60605 Phone: 312-913-7266</p> <p>OR</p> <p>CHA HCV Waitlist - Admissions 60 E. Van Buren, 9th flr. Chicago, IL 60605 Phone: 312-913-2600</p>
41	Nelson, Mary	<p>We need the CHA to provide automatic rights to be reinstated on a -- up to three years for anyone who has been purged from the waiting list, who has -- who -- we need the CHA to provide an automatic right to be reinstated on the list for up to three years to anyone who CHA has purged from the waiting list who later contacts CHA. We need the CHA to stop demolitions, lease the units, and do one-to-one replacement units. We need to preserve our public housing and thank you.</p>	<p>Please see response for Comment #40.</p>

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42	Nelson, Mary	My name is Mary Nelson and I am a leader with ONE Northside and the Chicago Housing Initiative. I am horrified by the CHA's decision to strip 47,000 families permanently off the list and to deprive them the chance of affordable housing. I am not the only person struggling today. There is a growing gap between real incomes and real rents which is putting the squeeze on more and more families in Chicago. I am writing about this issue because this impacts me, as a resident of Marah's place, a transitional housing program serving 30 women who are homeless and are on the waiting list like myself. When public housing sits vacant year after year, when publicly owned lots where public housing used to exist sit idle year after year, some of us will give up; some of us will move too many times to keep our current address on file with the CHA; some of us will pass on. We need the CHA to provide an automatic right to be reinstated on the list for 3 years to anyone who CHA has purged from the waiting list who later contacts the CHA. We need the CHA to lease up the vacant units, stop demolition, and build 1 to 1 replacement units. We need the CHA to preserve our public housing.	Please see response for Comment #41. Thank you for your comment. CHA continues to pursue and consider a variety of strategies in fulfilling its commitment of 25,000 units and providing additional affordable housing opportunities for low-income families.
43	Paige, Jacqueline	Good evening. I'm calling on you to pay attention to our needs. One of the needs that we have is housing for our children. I asked you last time if we would have a public forum about two heartbeats to a bedroom. You said you would take a look. I'm asking what the progress is on that? That's one thing. housing.	As with every policy, CHA will continue to evaluate and make recommendations as appropriate.
44	Paige, Jacqueline	Another thing I want to ask you about, I'm not quite for sure about project based How does that work? Does CHA pay for the housing and private entities manage it? If so, I thought CHA was getting out of the business. That's what I heard the five-year plan was supposed to about. Am I wrong?	CHA administers project-based vouchers (PBVs) through the Property Rental Assistance Program and provides long-term rental assistance for more than 1,900 units of housing for qualified low-income families. PBVs are issued directly to property owners, unlike tenant-based vouchers, and remain with the unit if a tenant moves out.
45	Paige, Jacqueline	In those instances are we getting the monies back that -- we were told there is no money for us because you're asking us to go to a -- two to a bedroom. If you're giving money to a private entity for them to build a house -- build a development for us to use but they're getting the money for managing it, and then it's under their ownership but Public Housing is paying for it, are they paying Public Housing back?	Thank you for your comment. CHA funds costs for the construction of public housing units within mixed income developments, and funds are typically provided in the form of a loan to the developer.
46	Paige, Jacqueline	CHA needs to build more subsidized housing and rent to people who have income. I know you have to put something in in order to get something out, in that case rent to people who have had steady income and have no criminal background in the last 10 years. Rent to people who got good rental history and the new housing developments should not fail this time around.	Thank you for your comment.

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47	Paige, Jacqueline	The last thing, the prohibitive conduct letters. One of our residents, one of our board members received a prohibitive conduct from the owner and her neighbors received a letter. She was very upset because she didn't want her owners to look upon her in a biased way. We are saying before these letters are sent out to our neighbors and this is our observation, could the charges be substantiated first? And then the owner and neighbors be given the prohibitive conducts letters. And also what about two heartbeats to a bedroom?	<p>The Prohibitive Activity and Conduct notice was implemented as part of the Improving Properties Initiative (IPI) in 2011 as a way to provide notice to residents and owners of alleged criminal activity taking place at or near the subsidized property. These notices are sent to both participants and owners when CHA receives information from the Chicago Police Department on activity at the subsidized address. If the offender is not identified as a HCV household member, the notice is sent to all HCV participants at the identified address where the incident took place as an alert. If the household member is the offender, CHA will investigate and as necessary follow its normal progressive enforcement action.</p> <p>In 2012, CHA worked with the HCV Participant Council to modify the language changing it from a warning to a notification letter. In addition, in 2013 the HCV Participant Council members requested that the notice not be included in the tenant file. CHA modified its process on how to handle the notices and adopted the suggestions of the HCV Participant Council. The notice provides a gentle reminder of the family obligations.</p> <p>As with every policy, CHA will continue to evaluate and make recommendations as appropriate.</p>
48	Puente, Sylvia, Executive Director, Latino Policy Forum	Based on the Moving to Work Annual Plan, the CHA plans to demolish four scattered sites in South Chicago. Research from the Institute for Housing Studies indicate that the demand for affordable housing in the South Chicago/Hegewisch area is over 10,500, and around 7,000 affordable units presently exist. That means, there is a gap of more than 3,000 affordable units in this area of Chicago, alone. If the CHA demolishes four scattered sites, that will only widen the gap between the supply and demand of affordable units in these neighborhoods, as well as city-wide. Yet, there are no explicit strategies in the Moving to Work Annual Plan for replacing all of these demolished units in South Chicago, as well as the other units that will be possibly demolished across the city such as Lathrop Homes, Frances Cabrini Row Houses, and LeClaire Courts.	CHA continues to pursue and consider a variety of strategies in fulfilling its commitment of 25,000 units and providing additional affordable housing opportunities for low-income families.
49	Puente, Sylvia, Executive Director, Latino Policy Forum	The CHA is required by federal law to affirmatively further fair housing. And, the demolition of public housing units in Chicago will absolutely have a disparate impact on the city's ability to provide affordable housing. We strongly urge the CHA to provide one for one replacement public housing units in opportunity areas such as Lathrop Homes and Cabrini Row Houses, in order to facilitate integration and affirmatively further fair housing in the City of Chicago. These public housing developments, in particular, are especially prime opportunities for housing Latinos.	Thank you for your comment.
50	Puente, Sylvia, Executive Director, Latino Policy Forum	Ultimately, we want to see Latino participation to increase to 20% for both Public Housing and the Housing Choice Voucher program over the next five years as well as ensure that the replacements of lost units are accounted for in CHA's annual plans. In order to increase Latino participation, we would like to see the following happen:	Thank you for your comment.

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51	Puente, Sylvia, Executive Director, Latino Policy Forum	<p>1. There is no consistency in the process for helping Spanish speaking participants. CHA needs to provide all documents in Spanish and ensure there are translators available at all CHA offices. Additionally, CHA should conduct quarterly briefings for CHA staff on translation options for non-English speakers.</p> <p>2. The CHA should bolster Latino-focused outreach efforts with a comprehensive, culturally-and linguistically-relevant marketing plan including a proportionate share of the marketing budget aimed for affirmatively marketing to the Latino community.</p> <p>3. We would also like to advocate for CHA to open bilingual English/Spanish CHA regional offices in highly-concentrated Latino neighborhoods such as South Lawndale (La Villita) and New City (Back of the Yards). These offices should be staffed by CHA as well as a subcontractor and qualified private management staff. In addition, the regional offices should have access to CHA databases and have the capacity to serve as a processing center.</p>	CHA translates all major documents in, at least, Spanish and other languages as required. CHA will consider other best practices in its outreach efforts to the many diverse populations it serves, including the Latino community.
52	Puente, Sylvia, Executive Director, Latino Policy Forum	<p>4. Through regional offices and additional bilingual staffing, the CHA should provide and keep household contact information in real time by annually confirming contact information is current via telephone calls, evening and weekend hour availability and possible home site visits.</p> <p>5. The CHA needs to implement a sustainable infrastructure comprised of CHA staff responsible and accountable to Latino outreach. CHA should designate an outreach team of at least three CHA staff members in addition to current consulting contracts and subcontractors.</p> <p>6. We also encourage CHA to establish and include, at an executive level- i.e. vice president level, oversight and responsibility for a comprehensive Latino marketing plan. We recommend that CHA appoint a vice president and/or executive leadership to be the designee for oversight and compliance to a comprehensive Latino marketing plan.</p>	Thank you for your comments.
53	Puente, Sylvia, Executive Director, Latino Policy Forum	<p>7. In order to have proportional representation of Chicago's diverse communities, efforts should be made so that 25% of CHA employees are of Latino backgrounds as well as culturally competent. We endorse Latino staff to be distributed and represented throughout the CHA hierarchy, with Latino representation at the vice president level and in significant leadership roles.</p> <p>8. The CHA should provide a written response to the public comment period by fully outlining what it does and does not plan to integrate into its administrative and annual plans, and why.</p> <p>9. The CHA should make public the breakdown of people recently purged from the recent waitlist update by race and ethnicity.</p>	<p>CHA is an equal opportunity employer and does not discriminate based on race, gender, religion or sexual orientation.</p> <p>CHA considers and responds to all public comments received on proposed items described in the annual plan. The comment/response grid is included in the appendices of annual plans.</p>
54	Puente, Sylvia, Executive Director, Latino Policy Forum	<p>10. The Lathrop Homes should be rehabbed as a combination of public and affordable housing, serving a range of low- and moderate income families. The development should be 50% public housing and 50% affordable housing (households earning 60-100% of Area Median Income), with the latter category including both rental and home ownership - allowing families, over time, to purchase their own homes without leaving the community. Allowing a certain percentage of families to remain in the community as they build household wealth makes sense. At the same time, the Lathrop plan should include a commitment to replace, one-for-one, the remaining public housing units (those not returned on site at Lathrop) in the gentrifying neighborhoods surrounding Lathrop, utilizing a combination of citywide and neighborhood waiting lists. These measures would allow the CHA to house families with a Right to Return to Lathrop while also housing many more families. Until these issues are addressed, the CHA's blanket request for permission for demolition & disposition in FY2014 is misguided and premature.</p>	<p>The Lathrop redevelopment planning process has involved extensive discussions with and input from a wide variety of stakeholders, including residents and the broader community. Finalization of plans with key stakeholders and continuation of the HUD Section 106 process are ongoing. The current proposed plan for the mixed-income development provides income diversity and balances a significant amount of preservation of existing buildings with new construction. Any proposed demolition or disposition at Lathrop is pending the conclusion of the HUD Section 106 process, the finalization of the master plan, and approval by CHA's Board of Commissioners and HUD. CHA will follow all applicable regulations prior to submitting any demolition or disposition application to HUD for approval.</p>

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55	Puente, Sylvia, Executive Director, Latino Policy Forum	<p>11. In order to facilitate Latino outreach, CHA should provide an organizational chart and delineate who is accountable and responsible for Latino outreach.</p> <p>12. In an effort to not discriminate toward Latinos and to increase Latino participation, there should be a directive prioritizing Latino households on the waitlists for housing placements. There should also be a clearly established coordinated agenda for Latino access and inclusion.</p> <p>13. CHA must allow management companies and subcontractors to use CHA Spanish language version forms- and this should include documenting client information in Spanish. In addition, CHA needs to clearly articulate, in English and Spanish, the process to access its documents for all programs. The CHA should also provide clear explanations for how long it will take for a current or potential CHA Spanish-speaking customer to receive CHA forms and assistance in Spanish.</p>	Thank you for your comment. CHA will consider the input as the agency uses data and best practices to inform its outreach efforts.
56	Puente, Sylvia, Executive Director, Latino Policy Forum	<p>14. It our understanding that CHA can prorate subsidies for mixed immigration status households so that social security number requirements for members of participant households is not a barrier to assisted housing, however all CHA staff and vendors that CHA funds for property management should be informed/trained on such policy.</p> <p>15. All waitlist update surveys must be provided in Spanish. In addition, CHA must provide a clear protocol to CHA housing vendors/delegate agencies for updating waitlist participants' contact information.</p> <p>16. CHA should include linguistic and ethnic diversity in its factors for "opportunity areas" in order to enhance access and affirmatively further fair housing.</p> <p>17. Both Housing Quality Standards owner briefings and mobility counseling for CHA tenants should be provided in Spanish.</p>	Thank you for your comment. CHA will consider the input as the agency uses data and best practices to inform its outreach efforts.
57	Puente, Sylvia, Executive Director, Latino Policy Forum	<p>18. The CHA should ensure that its community affairs office provides promotional materials/opportunities to CHA tenants and property owners in English and Spanish.</p> <p>19. The CHA should ensure development and redevelopment plans include local organizations and stakeholder involvement by increasing and improving communication with the Latino community.</p> <p>20. The CHA should include plans for larger-sized units in CHA housing in order to account for non-nuclear Latino family households.</p> <p>21. The CHA needs to maintain a representation of Latinos in the CHA Board of Commissioners that closely mirrors the increase in the Latino population in Chicago, in order to ensure that CHA leadership is reflective of the City's diverse population.</p>	Thank you for your comment. CHA will consider the input as the agency uses data and best practices to inform its outreach efforts.
58	Puente, Sylvia, Executive Director, Latino Policy Forum	In closing, we strongly urge the CHA to seriously consider the recommendations we have made today in going forward with its Moving to Work Annual Plan. It is vital to this city's growth and well-being that there is equity in access and inclusion to in Chicago Housing Authority programs. And, there is no equity if Latinos do not have adequate representation and participation in CHA programs.	Thank you for your comment. CHA will consider the input as the agency uses data and best practices to inform its outreach efforts.
59	Reed, Willie	This plan is unacceptable. You promised the residents of the Harold Ickes that it will be homes built for low income residents. It is wrong that the promise you made when you displaced us is not being kept. Any land swap is unacceptable, without having first built the replacement housing that was the original intended use of the land. Build our homes at the Ickes in 2014.	The former Harold Ickes site is currently planned for redevelopment as a future mixed-income, mixed-use site, including public housing units. CHA plans to issue a joint RFP with the City of Chicago in FY2014. Even if the proposed disposition does occur, there is sufficient land available to meet the Right of Return of current identified families who want to return to the former Ickes site.

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60	Rolden, Lissette	Residents of Lathrop Homes against demolition.	Thank you for your comment.
61	Rosenthal, Elizabeth, LAF	Although the Plan makes several references to the Project-Based Voucher (PBV) program, it is not the solution to the problem of lost units in areas of opportunity. An analysis of the (PBV) program shows that 83% of current and planned PBV units are located in "poverty" community areas and 60% of these units are located in racially segregated community areas.[2] It is troubling, therefore, to see that CHA is seeking to expand the PBV program so significantly and may increase the percent of assisted PBV units in some projects above the regulatory limit of 25% per family building.[3] See Plan, at 8; 67. Finally, the CHA's Housing Choice Voucher (HCV) Program will do little to keep families in racially and economically diverse areas of opportunity like the neighborhoods where the Rowhouses and Lathrop are located. According to CHA's own reports, voucher-holders are moving not to the North Side but to segregated areas of concentrated poverty on the South and West Sides.[4]	CHA is using various approaches aimed to increase the number of housing choices in opportunity areas.
62	Rosenthal, Elizabeth, LAF	In past Moving to Work Plans, the CHA stated that it would rehabilitate the Rowhouses and Lathrop Homes as 100% public housing. At the Rowhouses, 146 units were rehabbed and are occupied by residents who have satisfied their right of return. By Winter 2012, the unrehabbed Rowhouses were emptied through eviction and relocation. These approximately 440 viable units were taken "offline" and have sat vacant and unavailable to displaced CHA residents and people who have been on the waitlist for years. (A similar situation exists at Lathrop Homes, where the few remaining families have been transferred to one corner of the development and as many as 753 viable units sit vacant.)	CHA has indicated in prior Annual Plans that the Rowhouses and Lathrop Houses would not be rehabilitated as 100% public housing.
63	Rosenthal, Elizabeth, LAF	The Plan anticipates the possibility of submitting Demo/Dispo applications to HUD as early as 2014 for both the Rowhouses and Lathrop Homes.[1] The Rowhouses should not, however, be demolished. They should be rehabilitated as 100% public housing in line with CHA's original plans. Lathrop also should not be demolished and should include a much greater percentage of public housing than currently planned, with no "market rate" units. Preserving more public housing at Lathrop Homes and rehabilitating the Rowhouses as 100% public housing meets the MTW's Statutory Objectives of "increasing housing choices for low-income families" and "reducing costs and achieving greater cost effectiveness in federal expenditures." It is also consistent with CHA's statutory obligation to affirmatively further fair housing.	Thank you for your comment. CHA does not believe that there is any issue for CHA obligation to affirmatively further fair housing.
64	Rosenthal, Elizabeth, LAF	CHA has stated elsewhere in its Plan that it is seeking to place public housing units in "neighborhoods with low percentages of CHA-subsidized housing that are accessible to jobs and public transportation." See Plan, at 15. That goal has already been realized at both the Rowhouses and at Lathrop Homes. The Near North Side is a high-income, racially diverse neighborhood without the high concentration of public housing that exists in other Chicago neighborhoods. The Rowhouses are accessible to public transportation, grocery stores, employment opportunities at numerous businesses (including the new Target Store on Division) and in the Loop, and some of the best schools in the city. The same is true for Lathrop Homes, further north than Cabrini, and also in a racially and economically diverse area with access to transportation, grocery stores, and job opportunities (Costco and the stores along Elston near Diversey are nearby, for example). The area around Lathrop is also without high concentrations of public housing, currently and historically.	Thank you for your comment.

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65	Rosenthal, Elizabeth, LAF	It is sheer waste to ignore this opportunity and instead use CHA's limited funding to buy new properties. See Plan at 15. Furthermore, CHA's plan to acquire property is unlikely to succeed. Because of cost limits, purchasing other land on the North Side or any other racially diverse, non-poverty area would be cost-prohibitive. Accordingly, CHA would be forced to make up the loss of public housing at the Rowhouses (~400 units) and Lathrop (~500 units) in impoverished, racially segregated areas on the West and South Sides of Chicago. Although we note that Horner/Westhaven is covered by a consent decree, we are concerned that there will be a net loss of more than 100 units there too as the decree is likely to be modified. See Plan, at 16.	Thank you for your comment. CHA continues to pursue and consider a variety of strategies in fulfilling its commitment of 25,000 units and providing additional affordable housing opportunities for low-income families.
66	Rosenthal, Elizabeth, LAF	Rehabilitation is the answer, in part because it does not depend on market conditions the way mixed-income financing does. These offline units (thousands, by CHA's own admission) could come back online more quickly for displaced families and people on the waiting list. It makes financial sense and it makes sense for the families that CHA is committed to serving. If CHA pursues its current plan for the Rowhouses and Lathrop Homes, we do not believe that CHA can in good faith sign a declaration that it is in compliance with its duty to affirmatively further fair housing.	CHA believes that proposed plans for Lathrop and the Rowhomes are fully consistent with CHA's legal obligations.
67	Sankey, Christine	I, Christina Sankey, am a former resident of the Harold Ickes Development. I lived in the development from 1997 to 2008. While a resident, I was told the development was slated for demolition and I would have to relocate. I was not given adequate information for relinquishing my tenancy but was forced to relocate because of the deplorable conditions my family was living under. I chose to relocate with the right to return once the development was rebuilt. It has come to my understanding under the Proposed FY2014 MTW Plan, there is no mention of rebuilding the Harold Ickes. I think this was unfair housing displacement, therefore, I would like to return to the Harold Ickes Development promised from the original Plan For Transformation.	The former Harold Ickes site is currently planned for redevelopment as a future mixed-income, mixed-use site, including public housing units. CHA plans to issue a joint RFP with the City of Chicago in FY2014. Even if the proposed disposition does occur, there is sufficient land available to meet the Right of Return of current identified families who want to return to the former Ickes site.
68	Santos de la Rosa Simms, Terence Housing Policy Analyst Access Living of Metropolitan Chicago	Access Living supports CHA's efforts to continue pursuing the three statutory objectives of the MTW Demonstration Program in fulfilling the commitments of the original Plan for Transformation and achieving the goals of Plan Forward. We commend the CHA on the proposed new MTW activities for FY2014 that continue to provide more housing options for families, assist residents in achieving self-sufficiency, and increase the cost-effectiveness of public housing and Housing Choice Voucher program administration.	Thank you for your comment. CHA appreciates the long-standing working relationship it has with Access Living.
69	Santos de la Rosa Simms, Terence Housing Policy Analyst Access Living of Metropolitan Chicago	We appreciate our long-standing and continued referral partnership with the CHA in efforts to assist CHA's strategies to maximize leasing. Access Living applauds the continued use of Exception Payment Standards: wherein CHA is authorized to self-certify exception rents up to 300% of the established payment standard in order to increase housing options in opportunity areas throughout Chicago. This helps people with disabilities live in quality affordable housing.	Thank you for your comment. The application of the Exception Payment Standard as a reasonable accommodation for people with disabilities has been an integral part of providing housing opportunities for qualified HCV participants with disabilities. Increased payment standards create access to accessible housing in areas of the City of Chicago that may not have been available without the increase in payment.

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70	Santos de la Rosa Simms, Terence Housing Policy Analyst Access Living of Metropolitan Chicago	There are a number of other MTW Annual Plan features that Access Living endorses. However, we want to take this opportunity to present questions to strengthen the MTW Annual Plan: <ul style="list-style-type: none"> • Housing Stock: The lack of affordable housing is a significant barrier for low-income people with disabilities. According to Priced Out 2010, people with disabilities who rely on SSI as their primary source of income continue to be the nation's poorest citizens. Federal housing affordability guidelines state that low-income households should pay no more than 30% of monthly income towards housing costs – approximately \$211 per month for an SSI recipient in 2010. The annual income of a single individual receiving SSI in 2010 was equal to only 18.7% of the national median income for a one-person household. Over 20 percent below the 2010 federal poverty level of \$10,830 for an individual and in Illinois just 16.6% for a one-person household. 	CHA is cognizant of the relationship between people with disabilities and the need for affordable, accessible housing. CHA is partnering with several different entities as part of its Property Rental Assistance (PRA) Program that are committed to providing units designed as accessible for people with disabilities, whether physical or mental. Some properties also provide a social service component as part of the housing program. CHA is continuing to proactively research other ways it can participate in to provide housing opportunities specifically for people with disabilities.
71	Santos de la Rosa Simms, Terence Housing Policy Analyst Access Living of Metropolitan Chicago	Furthermore, there is generally no central source of information on housing options for people with disabilities. The housing crisis that exists today disproportionately affects people with disabilities who need safe, sanitary, and affordable accessible units. The demand for accessible affordable housing for people currently far outstrips supply. The CHA currently has 2,980 offline units. These units are unavailable for occupancy and offline for HUD-approved reasons such as pending demolition/disposition, ADA modification, routine or major capital maintenance, non-dwelling use, on-site employee use, relocation resources, and pending redevelopment. We raise the following important question(s): 1.) Of the 2,980 offline units, how many units will be accessible for people with disabilities?,	Based on current offline units under capital maintenance projects, there are plans for an estimated 50 units to be rehabilitated for people with mobility and sensory impairments. Pending finalization of redevelopment plans at several major sites with offline units, additional units will be made accessible.
72	Santos de la Rosa Simms, Terence Housing Policy Analyst Access Living of Metropolitan Chicago	2.) Will the units be compliant with Sec. 504?,	The currently planned units will be rehabilitated to comply with the Uniform Federal Accessibility Standards (UFAS).
73	Santos de la Rosa Simms, Terence Housing Policy Analyst Access Living of Metropolitan Chicago	3.) Will the units comply with Universal Design Standards?	The currently planned units are not Universal Design Standard units. In the future, CHA hopes to incorporate elements of Universal Design Standards into its projects.

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74	Santos de la Rosa Simms, Terence Housing Policy Analyst Access Living of Metropolitan Chicago	For example, the CHA failed in its efforts to conduct sufficient community outreach to people with disabilities in State Operated Developmental Centers (SODCs), Institutions for Mental Disease (IMD), and nursing facilities. We realize that this failure occurred over a time period that preceded your current administration. However, it remains that many people with disabilities in institutions are isolated from the general public. There is a critical need for special outreach efforts to make this population aware when the CHA's wait list is opened. The fact that only 0.0012% of the residents in nursing facilities and IMDs were reached by CHA's outreach efforts, stands as a testimony to this failure.	CHA revised its Affirmative Marketing policy in 2011. The policy follows the federal regulations laid out in 24 CFR § 960.103. Additionally, HUD's recently released notices on how to better market housing opportunities to people in institutionalized settings will be utilized as well.
75	Santos de la Rosa Simms, Terence Housing Policy Analyst Access Living of Metropolitan Chicago	The legacy of housing exclusion has in fact kept vast numbers of people with disabilities unjustly institutionalized with limited opportunities to exercise their independence. This has to be the starting place to understand how to improve outreach and avoid harmful situations like the purge. Purging the housing waitlist has only created additional barriers for people with disabilities. In addition, from a fair housing perspective we argue that differential treatment is already present when people with disabilities are searching for housing. Simply purging the housing waiting lists discriminates against people with disabilities and keeps them from affordable accessible housing. In relation to HCV, our questions are as follows:	Thank you for your comment.
76	Santos de la Rosa Simms, Terence Housing Policy Analyst Access Living of Metropolitan Chicago	1.) How many people with disabilities were purged from the HCV Waitlist?	During the waitlist update, there were 3,370 self-certified disabled applicants that were removed from the HCV waitlist. For any family that can show that they have a disability-related reason for not being able to complete the update, CHA has and will reinstate to the respective wait list. CHA wait list applicants who requested to be removed, or those who did not respond to CHA housing offers, or those who did not respond to requests for updated information, were removed from CHA's wait lists. In 2012, CHA notified all applicants of a required waitlist update through multiple communication methods including US mail, email, morning news, newspaper notices, community flyers, meetings, and individual phone calls to each applicant's primary, secondary, and emergency contact number. Applicants who did not respond online, by phone or in person to these multiple notices during the 7-week update period, or during the 30-day second chance, were removed from CHA wait lists. Applicants who feel they were removed from the CHA wait list in error can submit documentation to appeal their removal by contacting: CHA Public Housing Waitlist-Occupancy 60 E. Van Buren, 13th flr. Chicago, IL 60605 Phone: 312-913-7266 OR CHA HCV Waitlist - Admissions 60 E. Van Buren, 9th flr. Chicago, IL 60605 Phone: 312-913-2600

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77	Santos de la Rosa Simms, Terence Housing Policy Analyst Access Living of Metropolitan Chicago	2.) What outreach efforts will you conduct to reach people with disabilities in nursing facilities, IMD's and SODC's?	CHA will make concerted efforts to outreach to persons in institutionalized settings to inform them of housing opportunities. Such efforts will be made in accordance with CHA's Affirmative Marketing Policy as well as with guidelines established by HUD. All advertisements will be available in alternative formats. CHA will partner with appropriate social agencies, nursing homes, psychiatric hospitals, group homes, and other mental health facilities that serve this population. CHA will also publish information about its accessible housing stock for people with mobility and sensory impairments.
78	Santos de la Rosa Simms, Terence Housing Policy Analyst Access Living of Metropolitan Chicago	<p>• Housing Choice Voucher Program Initiative: The HCV Program Participant Portal is an interactive communication tool that will keep HCV participants connected with the HCV Program 24/7. HCV participants can access this online portal from a home computer or in CHA resource centers. HCV is one of the most important housing supports for people we serve, and especially for Colbert class members. Ease of access to the Portal is vital.</p> <p>1.) Will this online portal be fully accessible to people with disabilities? Is it 508 Compliant?</p>	In the development of the Participant Portal, CHA will consider and comply with the requirements under section 508 of the Rehabilitation Act of 1973.
79	Santos de la Rosa Simms, Terence Housing Policy Analyst Access Living of Metropolitan Chicago	<p>• CHA Waitlist</p> <p>CHA conducted a Wait List Update from December 3, 2012 through January 18, 2013. CHA conducted outreach to a total of 89,563 applicants by mail, phone, and e-mail to individuals on its Public Housing and Housing Choice Voucher Waitlists. Despite CHA's argument that they have conducted thorough outreach efforts to notify people with disabilities on the housing waitlist, their efforts have still fallen short.</p> <p>People on housing waitlists are often transient, moving between shelters and between friends and family. A total of 42,027 (47%) applicants completed the wait list update survey; and a total of 47,536 (53%) applicants who did not respond to the survey were removed from the wait list. The CHA's purging of its housing waitlist of these individuals, who either did not respond to their notifications or who seemingly could not be reached through CHA's form of outreach, reveals a much larger problem. Simply taking people off of the waitlist does not resolve housing issues for people with disabilities who need affordable accessible housing, and current outreach does not reliably identify people in need.</p>	<p>CHA wait list applicants who requested to be removed, or those who did not respond to CHA housing offers, or those who did not respond to requests for updated information, were removed from CHA's wait lists. In 2012, CHA notified all applicants of a required waitlist update through multiple communication methods including US mail, email, morning news, newspaper notices, community flyers, meetings, and individual phone calls to each applicant's primary, secondary, and emergency contact number. Applicants who did not respond online, by phone or in person to these multiple notices during the 7-week update period, or during the 30-day second chance, were removed from CHA wait lists. Applicants who feel they were removed from the CHA wait list in error can submit documentation to appeal their removal by contacting:</p> <p>CHA Public Housing Waitlist-Occupancy 60 E. Van Buren, 13th flr. Chicago, IL 60605 Phone: 312-913-7266</p> <p>OR</p> <p>CHA HCV Waitlist - Admissions 60 E. Van Buren, 9th flr. Chicago, IL 60605 Phone: 312-913-2600</p>
80	Sawyer, Eva	Harold Ickes (no additional comment received)	CHA is unable to respond without additional information.
81	Shirbroun, Greg Chicago Jobs Council	The Chicago Jobs Council (CJC) is pleased to provide comments on the Chicago Housing Authority's (CHA) proposed FY2014 Moving to Work (MTW) Annual Plan. Our comments focus on Section V: Proposed MTW Activities. Specifically, these comments address the fifth and final proposed activity, which would modify program requirements for the Family Self-Sufficiency program for Housing Choice Voucher (HCV) and public housing participants (pgs. 54-55).	CHA appreciates your support for its proposal and will take your suggestions into account as it implements program changes (pending HUD approval).

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82	Shirbroun, Greg Chicago Jobs Council	Regarding the CHA proposal to “create more stringent education requirements for program participants, including regular attendance at workshops”... CJC supports more stringent education requirements (e.g. regular workshop attendance) as long as all efforts are made to ensure that required educational activities are useful to participants, relevant to current labor market conditions, and high quality. CJC recommends that CHA regularly assess the utility and quality of educational activities through the use of workshop evaluations, participant surveys, and other tools. Findings from any assessments should be used to regularly improve any required educational activities.	CHA appreciates your support for its proposal and will take your suggestions into account as it implements program changes (pending HUD approval).
83	Shirbroun, Greg Chicago Jobs Council	Regarding the CHA proposal to “require participants to be continuously employed for at least 12 months prior to program completion” ... CJC supports the rationale provided for this change (i.e. increased self-sufficiency of graduates), but recommends the employment requirement be carefully defined. Additionally, CJC recommends reasonable allowances are given to participants affected by common labor market setbacks. In terms of definition, it is important to state whether this requirement can be fulfilled only through full-time employment, full-time and part-time employment, or if additional activities might fulfill the requirement. In terms of reasonable allowances, CJC suggests there be some recourse for an individual who loses a job due to labor market forces beyond his or her control. That is, if an individual loses a job through no fault of his or her own before 12-months have passed, he or she should still be able to meet the continuous employment requirement provided employment is regained promptly.	CHA appreciates your support for its proposal and will take your suggestions into account as it implements program changes (pending HUD approval).
84	Shirbroun, Greg Chicago Jobs Council	Regarding the commitment that, “policies will take effect immediately for new enrollees and optionally for current participants” ... CJC agrees with the decision to make the modifications mandatory for new program enrollees only and optional for current participants.	CHA appreciates your support for its proposal.
85	Suarez, Miguel	Miguel Suarez. I'm Lathrop president for the last 24 years. Also chairperson to the Lathrop (unintelligible). My concerns are very simple. No demolition, no high rise, no market rate. Lathrop is totally surrounded and saturated by market-rate housing. It's ludicrous to think of bringing anymore market rate demolition. The 2014 Annual Plan is talking about submitting an application for the demolition of all 925 non rehabilitative units at Lathrop. That's what it says on the plan. And to be talking about demolition when you're talking -- when you're supposed to be and are talking about preserving units at Lathrop Home, that doesn't make any sense period.	Thank you for your comment and continued participation in the Lathrop redevelopment discussion. The Lathrop redevelopment planning process has involved extensive discussions with and input from a wide variety of stakeholders, including residents and the broader community. Finalization of plans with key stakeholders and continuation of the HUD Section 106 process are ongoing. The current proposed plan for the mixed-income development provides income diversity and balances a significant amount of preservation of existing buildings with new construction. Any proposed demolition or disposition at Lathrop is pending the conclusion of the HUD 106 process, the finalization of the master plan, and approval by CHA's Board of Commissioners and HUD.
86	Suarez, Miguel	The developers are talking about a high rise. They call it the Iconic Tower. Thus far, they haven't said anything about how tall it is. They said it would be taller than the senior citizen building. They have compared it to that smokestack that we have that's truly very tall, but they have not yet said how tall it would be. You see, now to put a high rise in that area, it's not only ridiculous, I mean, you know what you're doing, and you're not going -- really thinking about the residents at all. This high rise is just simply to put more millions in the pocket of an already millionaire company. That's all it is.	Thank you for your comment.

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87	Waguespack, Scott Alderman, 32nd Ward	The CHA and its development team released a Draft Master Plan for Lathrop on July 30th of this year, but that plan leaves many key questions unanswered. In the midst of a low-rise development (and surrounding neighborhoods that are characterized primarily by single family homes and two and three flats), the plan calls for a high-rise building that would tower over the two- and three-story historic buildings at Lathrop that are the subject of the ongoing Section 106 discussions. The development team has still not informed me or the community of the proposed height or design of this high-rise structure. Another concern is that the CHA has not indicated any commitment or plan to replace the 525 lost public housing units that would result from the Lathrop master plan. The difficulties associated with locating sites for public housing in the area around Lathrop cannot be overstated. Unless and until these and other crucial issues are addressed, the CHA should postpone its request for permission for demolition & disposition. Thank you for considering my comments. I look forward to continuing to work with the CHA on the Lathrop Homes master plan.	Thank you for your comments. CHA appreciates your continued participation in the redevelopment planning process and will continue to work with you to address these issues in the final redevelopment plan. Final planning with key stakeholders and continuation of the HUD Section 106 process are ongoing.
88	Waguespack, Scott Alderman, 32nd Ward City of Chicago	The CHA's Draft Annual Plan for FY2014 indicates that the Authority may seek permission for demolition/disposition of "some or all" of the Lathrop Homes' 925 public housing units during FY2014. I believe this request is misguided and premature. The current plan calls for the demolition of only selected buildings on the site. Further, there are many issues associated with the plan that remain unresolved. Lathrop Homes, listed on the National Register of Historic Places, is comprised of structurally sound buildings which, with a proper renovation, can continue to provide much-needed low-income housing for the next 75 years. The U.S. Department of Housing and Urban Development (HUD) is currently leading a Section 106 process on the question of historic preservation at Lathrop. With this process still underway, it is premature for the CHA to seek blanket permission for the demolition or sale of Lathrop's buildings.	Thank you for your comments. Any proposed demolition or disposition at Lathrop is pending the conclusion of the HUD 106 process, the finalization of the master plan, and approval by CHA's Board of Commissioners and HUD. CHA is required by HUD to include any potential demolition or disposition activity in annual plans for public comment. Pending HUD approval of annual plans, a separate demolition or disposition application for specific activity must subsequently be submitted for HUD approval.
89	Washington, Francine	I had a lot of things to say, but I'm so tired of being tired. As residents, when I tell you nobody care about us but us, they don't care. Everybody talks about brick and mortar, brick and mortar and commercial space. We are building communities. Nobody said anything about no park district anywhere for the kids to play. We have Mandrake Park at Cottage Grove. No walls, open field. We have Metcalfe Park. No walls, no facilities. What about us? What -- our kids can't hang out up front, in the back. So what are we going to do? They -- what are they going to do?	Thank you for your comment.
90	Washington, Francine	No one said anything about building any recreational facilities, and don't tell me I got the-- everybody just to get theirs. Nobody is building nothing for us. They built this concrete reservation. The buildings look nice but most of them Legos anyway is prefab. What are you going to do about our kids? We are talking about a residence plan. What are we going to build for our children? Where are we going to go? There is no park, no park district. We have to have something.	Thank you for your comment. Under Plan Forward, CHA's goal is to develop complete, vibrant communities by coordinating public and private investments in non-residential uses including retail/commercial, recreational, educational, and community purposes as well as places of employment.

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91	Washington, Francine	People raising families. We are talking about mixed income. They are bringing in families raising kids. What are their kids going to do? If our kids can't hang out, theirs can't hang out. We are building Sullivan Station right now, and I got a lot of people that say you know what? I can't go --this is a concrete reservation. We can't barbecue. We can't hang out. There is no park. They told me I have to go to Davis Park. Davis Park? That little corner booth. So what are we talking about commercial space? CHA is going to continue to get funding from HUD and developers are going to steady get rich. What are you building for the people?	Please see response to Comment #90.
92	Washington, Francine	How we going to sustain our communities when they can't go anywhere and do nothing? Where are they going to work and play? We want to exercise. Don't tell me about no track and field. Track and field don't have a ceiling. I want someplace I can go in the wintertime as well as the summertime. I want to play chess and checkers and Ping Pong at the center. I want arts and crafts. I want modern dance. What are you going to do for us, besides laugh all the way to the bank helping developers get richer. If there is -- well the hell, we never said, Wal-Mart, K-Mart either. We have this land up. We get this. We are talking about this building for another 99, 50 years? It ain't going to last. What are you going to do? I'm going to tell them where you live. They are going to come looking for you.	Please see response to Comment #90.
93	Washington, Francine	What are you going to do with Washington Park? And I know about 45th and Eggleston. I go past these buildings all the time on Escanaba. So you need to let us know what's going on. You tell me, Ms. Washington, before you decide to take something down, since I'm still president of the Washington Park (unintelligible) that's Washington Park, Escanaba, 103rd Street slated for demolition because it's unrepairable. They're going to tear them down. When are you going to build some substantial recreational centers like park districts where our kids can go?	Please see response to Comment #90.
94	Whitfield, Robert	The CAC has commented on this issue several times, and requested that CHA expand the period for public comment, and provide additional public hearings on CHA draft MTW Annual Plans, at additional locations throughout the City. The CHA previously indicated, in response to CAC comments on CHA draft FY 2011 MTW Annual Plan, that CHA would "review the policy around public comment periods for future MTW Annual Plans". CHA has not, as of this date, modified its policy to expand the comment period for CHA draft MTW Annual Plans, and or to hold public hearings on the draft CHA MTW Annual plans at additional locations throughout the City.	Thank you for your comment. CHA will consider your feedback. In accordance with our MTW Agreement, CHA has continued its practice of having a 30-day public comment period, during which one public hearing is held on the MTW Annual Plan. The public comment process allows residents, participants and the general public to comment by mail, email and fax, in addition to providing written and oral comments at the public hearing. Even in the context of the CAC's various comments on this issue, this process allows adequate opportunities for review and input in an effective and efficient manner. In addition, this year CHA also provided an overview of the MTW Annual Plan at a resident-only forum during the public comment period to consider the usefulness of additional forms of soliciting input on the annual plan.

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95	Whitfield, Robert	The CHA MTW Plan is described by CHA and the United States Department of Housing and Urban Development (HUD) as the largest in the country. This year, the CHA proposed MTW Annual Plan is utilizing the new HUD MTW reporting provisions mandated for MTW public housing authorities (PHAs). Further, the proposed CHA FY 2014 Annual Plan contains proposals for several sites that involve proposed demolition and disposition; and for the first time ever, a CHA proposal for an application for participation in the HUD Rental Assistance Demonstration (RAD) program for a CHA senior building. The proposed CHA FY 2014 MTW Annual Plan also contains proposals that will affect participants in CHA's HCV program. It is therefore essential that CHA expand the public comment period for the proposed CHA FY 2014 MTW Annual Plan; and provide additional public hearings at other locations and times throughout the City.	Please see response for Comment #94. Per HUD guidelines, CHA is not required to fully adopt the new HUD Form 50900 MTW reporting requirements until the FY2013 MTW Annual Report, which is due to HUD on March 31, 2014. CHA will continue to comply with the applicable regulatory requirements prior to submitting any demolition/disposition application to HUD for approval . Any specific RAD transaction will require an amendment to the annual plan with a public comment period and hearing.
96	Whitfield, Robert	The current CHA policy of holding a single public hearing on its MTW Annual Plan at the same location and time may substantially limit public participation and comment by elderly and disabled public housing residents and families participating in CHA's HCV program. Many depend on the PACE system for transportation to and from events, such as the CHA MTW public hearing. It is more difficult for those elderly and disabled public housing residents and or HCV participants to make PACE travel arrangements for evening events, then for events scheduled during day time hours. Also, Lathrop Homes, and CHA scattered site units on the North East and North West part of the City have the largest concentration of Hispanic families. CHA's continued refusal to convene additional public hearings on its MTW Annual Plans in areas of the City convenient to this CHA population may unfairly limit the opportunity for these CHA public housing and HCV families to appear and comment on the proposed CHA MTW Annual Plans.	Please see response for Comment #94.
97	Whitfield, Robert	These are additional comments on the CHA Draft FY 2014 Moving to Work (MTW) Annual Plan. The prior initial comments on the CHA Draft FY 2014 MTW Annual Plan requested once again that CHA consider providing additional time for public comment, and additional public hearings at additional locations convenient to all CHA public housing residents, and all participants in CHA's Housing Choice Voucher (HCV) program. This is especially critical given the size and complexity of the CHA Plan, (which is continuously described by CHA and the U.S. Department of Housing and Urban Development (HUD) as the largest most comprehensive PHA plan for public housing redevelopment in the nation. CHA, as of this date, has not responded to the prior request, and has not indicated it will expand the time for public comment and or provide additional public hearings on the draft.	Please see response in Comment #94. Any specific RAD transaction will require an amendment to the annual plan with a public comment period and hearing.

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98	Whitfield, Robert	Also, the CHA Draft FY 2014 MTW Annual Plan has language on the Cabrini Row Houses and Lathrop Homes indicating CHA may submit an application for disposition and or demolition for some or all of these units. This CHA proposed disposition and or demolition initiative for FY 2014 for these sites was not discussed with the Cabrini Green and or Lathrop Homes residents prior to the issuance of the CHA Draft FY 2014 MTW Annual Plan; nor was it discussed with the Cabrini and or Lathrop Homes Local Advisory Councils (LAC), or the Central Advisory Council (CAC), in its capacity as the Resident Advisory Board (RAB) for CHA public housing residents. This approach is not consistent with regulatory requirements governing RABs, or with the above referenced HUD Notice requiring public comment and consultation with the designated RAB; and is also not consistent with repeated CHA written promises (in E-mails dated April 3rd, 8th, 9th, 11th and the 16th), that the CEO would meet with Lathrop Homes residents on the Lathrop Homes redevelopment and the proposed CHA consolidation of Lathrop Homes residents during the Lathrop redevelopment process.	CHA's practice is to comply with the applicable regulatory requirements for input on any proposed disposition or demolition prior to submitting any such application for a disposition or demolition to HUD for approval.
99	Whitfield, Robert	Additional public comment and or additional public hearings are especially critical this year because of significant new reporting requirements for CHA and other MTW public housing authorities (PHAs); and new guidelines that HUD has issued for PHAs because of decreased funding nationally for the public housing and the HCV programs. The "MTW Baseline Project" is a new HUD compliance effort, and is described in the January 10, 2013 HUD Notice (HUD Notice PIH-2013-02), and is briefly referenced in the CHA's Draft FY 2014 MTW Annual Plan. HUD also issued a January 20, 2013 Notice (Notice PIH 2013-03) establishing temporary guidelines for all PHAs because of decreased funding nationally for the public housing and the HCV programs. The funding for the HCV program is especially critical, as outlined in the recent NAHRO publication describing the wide spread negative effect on the HCV programs caused by decreased funding nationally. This is also briefly referenced in CHA's Draft FY 2014 MTW Annual Plan.	Please see response for Comment #94 and #95.
100	Whitfield, Robert	All of the above are more than adequate reasons for CHA to expand the period for public comment on the draft FY 2014 MTW Plan, and to provide additional public hearings at locations throughout the City to accommodate the significant number of CHA public housing residents and participants in the CHA HCV program who reside on the far west side, and the north and northeast side of the City. A single CHA public hearing on the south side of the City is not conducive to greater participation by the CHA public housing residents and CHA HCV participants living in those areas; and is also not conducive to greater participation by elderly and disabled CHA residents and participants in the HCV program. The majority of these residents and or HCV participants do not have access to the Internet, and or are not able, and or do not have the computer knowledge or skills, to comment on line. That is why additional time and additional hearings on the draft Plan are essential.	Please see response for Comment #94.

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101	Whitfield, Robert	The CHA CEO recently spoke at the CHA Board meeting and asserted that CHA has exceeded the vacancy rate goals established for CHA by HUD. However, if CHA was not allowed to continue to omit significant vacant units at Lathrop Homes and Cabrini, CHA's vacancy rate would exceed the goals established by HUD, and would possibly put CHA in a troubled status. It should be stated for the public that those vacancies are being maintained by CHA for future redevelopment, even though it is questionable whether the vacancies can be omitted from the calculation of CHA vacancy rate, or whether current HUD regulations, or the CHA MTW, authorize this policy.	CHA continues to work with HUD on vacancy reduction strategies and on the issue of offline units. CHA reports regularly to HUD on the number of vacant and offline units and is in compliance with HUD's requirements for vacancy reporting and policies. CHA also reports the status of offline units on a quarterly basis on CHA's website at: www.thecha.org .
102	Whitfield, Robert	The CAC is again requesting that CHA and HUD reconsider and withdraw the waiver of 24 CFR Part 964 for the CHA mixed finance developments, and allow CHA public housing residents at those sites to vote for resident councils per the regulations at 24 CFR Part 964. The recent class action lawsuits at Oakwood Shores and the Cabrini mixed finance sites make it clear that the CHA Ombudsman cannot be an advocate for CHA public housing units at those sites on this or other resident issues because the Ombudsman is a CHA employee, and cannot oppose CHA policy. It is essential that the mixed finance public housing residents have a resident council that can advocate for public housing issues at those sites.	CHA does not comment on litigation. The Ombudsman, as a CHA employee, is not precluded from advocating for CHA residents in mixed-income, mixed-finance communities.
103	Wilkie, Janie	I have read in the comment part of the federal regulations concerning the public housing tenants, it is said that CHA tenants should not be allowed to work on the operational level of the housing authority because many of them don't have bank accounts and are unable to balance out a checking account. I cried when I read this! This is one of many negative comments which the government has allowed the public to submit. This is a classic example of the CHA not allowing HCV to participate in their program which is being governed by the legislators and scrutinized the public who are individuals which have never lived in public housing neither were they voucher holders.	CHA is an equal opportunity employer and does not discriminate based on race, gender, religion of sexual orientation. To search and apply for CHA employment opportunities, please visit the CHA website at www.thecha.org .
104	Wilkie, Janie	\$75 rent increase for public housing as well for HCV, is not fair to increase the minimum rent on the HCV program as there is much available funding for this program. a. statutory objective: MTW 111 is to reduce costs and achieve greater cost effectiveness in federal expenditures b. federal expenditures cost can be most effective if CHA and the MTW programs cut back on their programs; these are things that cha should do to reduce cost: ----cut back on the expenditures for the Nan McKay program ----cut backs in staff ----cutback in the way that the programs such as the inspections are handled ----cutbacks in the legal staff	This is not a new policy proposal. The \$75 refers to the minimum rent amount a family is expected to contribute to their portion of the rent. Families may request and may be eligible for a hardship exemption to the \$75 minimum rent. CHA implemented the \$75 minimum rent for both public housing and HCV programs in 2009. The \$75 minimum rent was approved by the Board of Commissioners in the 2007 Admissions for Continued Occupancy Plan (ACOP) for public housing and the 2008 HCV Administrative Plan.
105	Wilkie, Janie	Sec 1 pg7-8 program 454,901,133.00 HCV Sec-8 program income: \$704,124,010.00 CHA spends approximately on the HCV pro the balance CHA doesn't use on the HCV program is \$249 million. What is CHA utilizing the HCV funding on?	Housing Choice Voucher funding is primarily used to pay owners the Housing Assistance Payments (HAP) for vouchers leased through the HCV program and for HCV program operations. As stated in the annual plan, as a MTW agency, CHA has the flexibility to combine funding sources, including public housing operating funding, public housing capital funding, and HCV program funding for use across multiple programs.

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106	Wilkie, Janie	HUD should not allow CHA to MERGE the public housing program with the HCV program. These are two separate programs and should never be intertwined. The HCV program needs to have a separate new management. We have never been included, we are always excluded in governing of our program. The funds which HUD has made must be made readily available for the HCV Sec-8's need and should be utilized toward building "our" program upward.	CHA will continue to administer two primary housing subsidy programs: Public Housing and Housing Choice Voucher. The Uniform Housing Policy will align housing policies to streamline and clarify for more efficient program administration. CHA seeks to unify some standards and processes to make it more user friendly for its customers.
107	Wilkie, Janie	All of CHAs operations are for the public housing, HCV's are barely included; a. we are not properly informed of the formal hearings held on the yearly plans, b. now they just started including us in the operation warmth program the park district program. The only thing CHA is giving to HCV is rental assistance. HUD has funded the HCV program generously throughout the years. the HCV program is not receiving what it should be getting. CHA tells us that the HCV program is under funded and they must cut down on the our program expenditures such as the rental assistance voucher. CHA has become wealthy from the HCV income HUD has issued down to them for the HCV program and the voucher holders are not properly represented.	CHA announces its 30-day public comment period and public hearings for its annual plan in advance as required. The standard procedure is to advertise in local newspapers. In addition, information is posted on CHA's website and in all CHA properties, HCV Satellite offices, and regional service office locations for public review. The document for comment is posted on the CHA website and available in its property and office locations for public review.
108	Williams, JoAnne	I feel the plans for Ickes Homes are not fair, unacceptable to the residents with the right to return. The plans consist of swapping or selling some of the land, and in that event the unit numbers will decrease, which means that decreases the number of residents that may return to the development. In the beginning Ickes was promised 322 units, now with commercial property being built on the land as well as residential property, the residential numbers will be less than previously promised. CHA has been dragging the redevelopment of Ickes for a while now, yet they have been receiving money for approximately two years and not one thing has been done on the land. There was no mention of commercial development when they promised the resident of Ickes their right to return after transformation, now all of a sudden the residents have been pushed aside, disregarded and disrespected by the CHA.	Thank you for your comment. Under Plan Forward, CHA's goal is to develop complete, vibrant communities by coordinating public and private investments in non-residential uses including retail/commercial, recreational, educational, and community purposes as well as places of employment. The former Harold Ickes site is currently planned for redevelopment as a future mixed-income, mixed-use site, including public housing units. CHA plans to issue a joint RFP with the City of Chicago in FY2014. Even if the proposed disposition does occur, there is sufficient land available to meet the Right of Return of current identified families who want to return to the former Ickes site.
109	Williams, JoAnne	Where does the transformation for the residents of Ickes begin? It feels like a breach of contract of good faith was placed on the Ickes Community by the CHA. Residents should be taken into consideration first and foremost, especially since promises were made to them and their families in the beginning. We trusted the CHA to deliver what they promised. Moving to Work is not beneficial to Ickes residents	Please see response to Comment #108.
110	Wilson, Roderick The Hope Center	I'm here today to comment on the plans especially about two developments, Robert Taylor and Ickes Homes. There is an increase of public housing units, 20, 30 units but there like 500 units still around the table. We know there is dispensation to sell part of the land for commercial endeavors. I think there needs to be more aggressive building or placing of units there. If we have a list that has tens of thousands of people, and you're receiving placement housing money, millions of dollars, the housing should be built for the people. So before we have disposition, move forward with -- there should be plans to lay out how those 500 units, when they're going to come on line.	Thank you for your comment. Under Plan Forward, CHA's goal is to develop complete, vibrant communities by coordinating public and private investments in non-residential uses including retail/commercial, recreational, educational, and community purposes as well as places of employment. Even if the proposed dispositions occur for former Ickes or Taylor land, there is sufficient land available to meet the Right of Return of current identified families who want to return to the former Ickes site as well as the former Robert Taylor site.

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111	Wilson, Roderick The Hope Center	Same thing with Ickes. We know there has been received from placement housing money for Ickes every year, but no units for public housing has been built yet. Same with LeClaire Courts, \$700,000 a year. Before there is any land swap for the Ickes, what is the plan to create all -- bring all 300 units back and that's not listed in there. I think you're saying you're going to issue an RFP. Next year, could you do a little more? You could build some housing next year for people because people need the housing and Chicago -- how can we have our public there is millions of dollars that can be used for giving people better living conditions.	The former Harold Ickes site is currently planned for redevelopment as a future mixed-income, mixed-use site, including public housing units. CHA plans to issue a joint RFP with the City of Chicago in FY2014. Even if the proposed disposition does occur, there is sufficient land available to meet the Right of Return of current identified families who want to return to the former Ickes site.
112	Wilson, Roderick The Hope Center	The proposed 2014 Moving to Work Plan does not go far enough in the development of the promised replacement housing. The Robert Taylor Developments are owed over 500 units of public housing, this plan only includes bringing back an additional 30 units. This is after you amended your 2013 plan to sell 6 square blocks of public housing land for commercial endeavors such as XS Tennis. More public housing units need to be built before land is sold to any commercial endeavor. You have completed less than half of the public housing units promised at the former Robert Taylor site.	Thank you for your comment. Even if the proposed disposition of portions of Robert Taylor occur, there is sufficient land available to meet the Right of Return of current identified families who want to return to the former Robert Taylor site.
113	Wilson, Roderick The Hope Center	The Harold Ickes Homes have been demolished for several years. Many residents have been displaced for over 5 years. This plan only includes identifying a developer for the Ickes. This plan should include the building of the replacement housing by the end of 2014. It should include a completion date. It should show the phases of development for this project. This vague description for the development of the Ickes Homes is unacceptable. Ickes residents want to come home, their community was demolished with the demolition of the buildings and their displacement. I urge you to make the rebuilding of the Harold Ickes replacement housing and the return of any and all former residents that have the desire to reside at the new Ickes site a priority for the 2014 Moving to Work Plan. This is the only humane option for the CHA to propose.	Thank you for your comment.
114	Wilson, Roderick The Hope Center	In conclusion, the proposed 2014 Moving to Work Plan should include more development of the replacement housing for the former Robert Taylor Development and the Harold Ickes Homes. The residents that have been displaced in unsafe environments deserve the opportunity to come home.	Thank you for your comment.

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115	Winding, Michelle	Michelle Winding, and I actually, I'm and organizer with Metropolitan Tenants Organization. But I actually spearhead a program called Stabilized Rental Housing For Women and Children. So I would like to basically add to the comments that have been here today just to confirm that we -- right now, I have so many women and families that are literally homeless right now. They are displaced because of the long waiting list. I have a woman who walked into my office who been on CHA's waiting list for 18 years, and she was just so excited when she finally did get a letter. And some of them have been disappointed because they have even received letters stating that they did not send in their information, and they did send in their information. And so, basically my comment is, who is going to be responsible? You don't have to answer that question, because we will make sure that we get it done. But this is the thing. Who's going to be responsible for the homeless families?	<p>Thank you for your important work in the community. CHA continues to seek strategies to provide more housing options to low-income families. In addition, CHA provides long-term rental subsidies that support over 1,300 units specifically targeted for the homeless population. Homeless individuals seeking assistance may also register for Chicago's Central Referral System at: http://www.chicagocrs.org/.</p> <p>CHA wait list applicants who requested to be removed, or those who did not respond to CHA housing offers, or those who did not respond to requests for updated information, were removed from CHA's wait lists. In 2012, CHA notified all applicants of a required waitlist update through multiple communication methods including US mail, email, morning news, newspaper notices, community flyers, meetings, and individual phone calls to each applicant's primary, secondary, and emergency contact number. Applicants who did not respond online, by phone or in person to these multiple notices during the 7-week update period, or during the 30-day second chance, were removed from CHA wait lists. Applicants who feel they were removed from the CHA wait list in error can submit documentation to appeal their removal by contacting:</p> <p>CHA Public Housing Waitlist-Occupancy 60 E. Van Buren, 13th flr. Chicago, IL 60605 Phone: 312-913-7266</p> <p>OR</p> <p>CHA HCV Waitlist - Admissions 60 E. Van Buren, 9th flr. Chicago, IL 60605 Phone: 312-913-2600</p>
116	Winding, Michelle	Every time a woman comes in to my office, and I see her and her children, and the thing is that they're not homeless because of something they did. They're homeless because they were waiting on promises that you all did not deliver. So today, I want you all to know, that even though you will put these things on the back burner, I'm asking you to have a clear mind, and when you all get into your chambers, have a clear understanding of the comments that are being made here, and really take them that consideration. Because, for instance, I wrote the Obama campaign in Ohio, I said that to say, when I went to work on that campaign, my initiative was to make sure that the people that came to work on that campaign were housed. They had housing. That they were not homeless. They could support the president. And I come with that same zeal today. I'm saying, if I have to go from corner to corner or whoever I have to group with just like these people here, I'm saying that our voices will be heard. You will be hearing from us.	Please see response for Comment #115.
117	Zeigler, Tolnisia	To whom it may concern, I want to know why CHA only opens it public housing, section 8, and scattered site housing waitlist every 10 or more years? I think CHA need to lease up it's vacant units as soon as one become available to rent, lease it up. I believe CHA needs to start putting people out who are not lease compliant and give those a chance who need housing. I think CHA need to do away with the 1/3rd 1/3rd 1/3rd in it's mixed income and try to have different rules and income at different CHA site. PLEASE BRING BACK SUBSIDIZED UNITS THANK YOU! I think CHA also needs to transition everyone who's income is enough to rent in market rate, move them to a market rate unit of their choice. CHA please let people choose what development they want to live in, just because we are low income that doesn't mean we shouldn't have rights.	CHA opens its Housing Choice Voucher, Public Housing and Scattered Sites wait lists according to need only. CHA last opened the Public Housing Family Wait List in 2010 and the Housing Choice Voucher wait list in 2008. The last Scattered Site wait list opening was in June 2013. As stated in the annual plan, CHA will monitor and potentially open wait lists as necessary in 2014. CHA does and will continue to lease units in a timely matter from the wait list and will enforce the lease. CHA already offers applicants a choice to select a specific geographic region.

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ROW #	INDIVIDUAL OR ORGANIZATION	COMMENT	CHA RESPONSE
118	Zeigler, Tolnisia	When people are removed from the section 8 waitlist, public housing waitlist, scattered site housing waitlist, do you think that you guys can create a system so people can get back on when they please, if they were once already on there?	<p>CHA wait list applicants who requested to be removed, or those who did not respond to CHA housing offers, or those who did not respond to requests for updated information, were removed from CHA's wait lists. In 2012, CHA notified all applicants of a required waitlist update through multiple communication methods including US mail, email, morning news, newspaper notices, community flyers, meetings, and individual phone calls to each applicant's primary, secondary, and emergency contact number. Applicants who did not respond online, by phone or in person to these multiple notices during the 7-week update period, or during the 30-day second chance, were removed from CHA wait lists. Applicants who feel they were removed from the CHA wait list in error can submit documentation to appeal their removal by contacting:</p> <p>CHA Public Housing Waitlist-Occupancy 60 E. Van Buren, 13th fl. Chicago, IL 60605 Phone: 312-913-7266</p> <p>OR</p> <p>CHA HCV Waitlist - Admissions 60 E. Van Buren, 9th fl. Chicago, IL 60605 Phone: 312-913-2600</p>
119	Zeigler, Tolnisia	CHA needs to do a waitlist update every year and purge the waitlist to keep the process of people receiving affordable housing moving. CHA doesn't have time to keep looking and searching for people who don't want to be found, remove their name from the waitlists and move on to a family who may still need the help for a little while. Will CHA reopen the waitlist in 2014? Please purge the waitlist so that you can reopen the list and get people in housing a.s.a.p.. Those people purged will get the opportunity to reapply when the waitlist reopen. A lot of the people who are being purged most likely are deceased move to other states like Minnesota, Iowa and Wisconsin or have found better housing elsewhere.	CHA conducts wait list maintenance in accordance with HUD guidelines. CHA's wait lists are periodically opened based on need. As stated in the annual plan, CHA will monitor and potentially open wait lists as necessary in 2014.
120	Zeigler, Tolnisia	The Windy City has distinctions but not positive ones. Chicago's retail sales tax is the highest in the nation at 10.25 percent. Unions, high taxes, and political corruption have made Chicago one of the leaders in big city decline. Chicago again continued its population decline with a loss of 63,000 from 2000 to 2006 leaving a total of 2,833,321. Little known fact: The Chicago Housing Authority leaves thousands of its apartments vacant in any given year. CHA reported in 2010 that it had "delivered" 20,288 apartments, but that only 18,325 were "available for occupancy" and only 15,984 were actually leased. Why is there a 4,300+ unit difference between apartments available and apartments actually occupied?	<p>CHA's progress toward the 25,000 unit goal is not the same as the total number of CHA public housing units, or the number of online public housing units ("available for occupancy"). Public housing units renovated or redeveloped through the Plan over a decade ago, though, counted toward unit delivery progress, may now temporarily be offline for HUD approved reasons.</p> <p>Moreover, project based vouchers administered through CHA's PRA program are not CHA ACC/public housing units, but do provide needed affordable housing opportunities and are counted toward the overall goal of 25,000 revitalized housing units. Unit delivery progress and public housing unit counts are reported in separate areas of the annual plan.</p>
121	Zeigler, Tolnisia	Little known fact: The CHA counts many of these "offline" units as 'replacement housing' towards their 25,000 unit commitment, even though the apartments are not housing anyone. Little known fact: We're not talking about short-term vacancies--- we're talking about 2 years, 4 years, 6 years, 10 years vacant. Little known fact: These vacant apartments are located on all sides of the city (north, south, and west), in scattered site housing, senior housing, and traditional family housing. Little known fact: The CHA continues to receive money from HUD for a significant number of these vacant apartments, whether they are occupied or not. Now a well known truth: With over 68,000 households on the CHA's waiting lists, many living in homeless shelters, it is unacceptable for the CHA to leave even a single habitable apartment vacant over the long-term.	CHA continues to work with HUD on vacancy reduction strategies and on the issue of offline units. CHA reports regularly to HUD on the number of vacant and offline units and is in compliance with HUD's requirements for vacancy reporting and policies. CHA also reports the status of offline units on a quarterly basis on CHA's website at: www.thecha.org .

Public Comments – FY2014 MTW Annual Plan Amendment

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Plan Amendment Grid Comment #	Individual/ Organization	Comment	CHA Response
1	Charles Barlow	When I went to 60 E. Van Buren this afternoon I was informed that I would need to contact you to obtain copies. I realise that this is not your fault, but it was nevertheless frustrating to travel downtown to leave without the documents the notice states are available at CHA's corporate offices. Please can you send hard copies of all documents out for public comment as soon as possible.	<p>Thank you for your comment. Hard copies of the documents proposed for public comment are generally available at 8am on the first day of the public comment period. Unfortunately, for this comment period, hard copies of the document were not available in CHA's lobby until July 1. CHA apologizes for the inconvenience, however the documents were available for review on CHA's website at the start of public comment on June 27.</p> <p>CHA did intend to mail hard copies of the document per this request, however the mailing was delayed. CHA later arranged to provide hard copies on July 9, and the copies were provided.</p>
2	Robert Whitfield	The Central Advisory Council (CAC) has repeatedly complained about the Chicago Housing Authority (CHA) policy of convening a single public hearing on the various draft documents that were issued by CHA for public comment and a public hearing. The draft CHA documents included draft Admissions and Continuing Occupancy Policy (ACOP) drafts, draft residential leases, draft Housing Choice Voucher (HCV) Administrative Plans, and draft amendments to the CHA Moving to Work (MTW) HUD approved program. These documents were normally issued by CHA at different dates and times, for a thirty day period, which included a single public hearing. CHA has, (based on my research of CHA files) for the first time ever, issued the draft ACOP, and the draft residential lease, at the same time it has issued a draft HCV Administrative Plan. The Notice issued by CHA provides for three hearings, but does not provide for any additional time for public comment. Further, CHA has also issued a draft FY 2014 Amendment to the CHA MTW program, to include changes to the flat rent policy, and information on the proposed CHA Rental Assistance Demonstration (RAD) program. This means that CHA has issued drafts on four different and complex areas of public housing and HCV operation, that could have enormous impact on public housing residents, and HCV participants. Each of these draft documents, by themselves, should have warranted separate comment periods and public	<p>Thank you for your comment. The public comment period took place from June 27-July 28, 2014. Comments could be made through a variety of options throughout this period, including at public hearings and/or by phone, email, fax or mail. CHA did hold three hearings, rather than one, during this comment period. CHA follows a standard process for conducting public hearings. Public hearings are not the only medium for comment on proposed documents during the public comment period.</p> <p>Only portions of the documents out for public comment contained the proposed changes. In addition to redlined versions of the documents which indicated specific proposed changes, CHA provided documents summarizing the changes proposed for the HCV Administrative Plan, ACOP and Public Housing Lease. In</p>

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		<p>hearings to allow sufficient time for residents and HCV participants to review and make informed comments on the drafts. The CHA change grid for the draft 2014 HCV Administrative Plan totals 51 pages. It is neither realistic, or fair, to expect public housing residents and or HCV participants (and or applicants to these programs) to review and make meaningful and informed comments on all these complex program changes, deletions and or additions within the current 30 day public comment period, especially since many CHA residents and or HCV participants do not have access to computers, and or are computer literate; and will therefore not be able to timely access the CHA website to become aware of these drafts, and or to submit comments. Also, will CHA change its usual policy and allow more than the usual three minutes per speaker to comment at the public hearings, or will each speaker still be allotted a total of three minutes, even if he or she wants to comment on more than one draft CHA program document? CHA should, at the very least, expand the comment period for an additional thirty days to allow for the fact that the public comment period covers different program areas, and will require additional time to review and prepare comments. CHA should also add some public hearing dates during the expanded public comment period, and include some public hearings in CHA senior buildings. This will ensure greater participation by CHA seniors; which is extremely important because of the potential impact on seniors under the proposed CHA RAD initiative, and the mandatory changes imposed by HUD on the current CHA flat rent policy.</p>	<p>addition, CHA has communicated in a variety of ways to residents affected by changes to flat rent policies as well as those in potential RAD sites.</p> <p>CHA continuously works to improve and adapt the public comment process as necessary.</p>
3	Robert Whitfield	<p>The senior housing Local Advisory Council (LAC) Presidents, and members of the Senior Housing Advisory Council (SHAC), continue to request information on certain aspects of the proposed CHA RAD initiative. Neither the CHA RAD updates, and or the recent RAD information video shown at the July CHA Board of Commissioner meeting, have been fully responsive to these requests. CHA has repeatedly stressed the financial stability of the RAD program once CHA public housing buildings and sites are converted to the project based Section 8 program under RAD. It is true that the RAD project based program will have an extended Annual Contributions Contract (ACC), with an automatic extension for an additional 15 to 20 years. However, the public housing ACC is also stable. Further, the ACCs for the CHA senior buildings were extended (by Federal law) for an additional 20 year period dating from the date of the completion of their rehabilitation</p>	<p>CHA does not anticipate any financial shortfalls at these sites related to the transition to RAD.</p>

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		<p>under the CHA Plan for Transformation. Further, the substantial modernization funded work now underway in many of the CHA senior buildings will extend the ACC even further after completion of the work. Accordingly, it is more accurate to state that both programs (public housing and project based Section 8) are stable, and both are (and will be) subject to funding appropriations by Congress. Also, the continued decline in funding for the public housing program nationally is not a question so much of Congress refusing to fund public housing requests submitted by HUD, but rather the decisions by the HUD D.C. office to request less funding for public housing over the last few years. This is evident from the attached 2014 and 2015 HUD budget summary's. Another issue, given the stated intent by CHA to convert public housing units under RAD to the project based program, is how the continued substantial shortfalls in the administrative fees for the Housing Choice Voucher programs will affect those CHA units converted under RAD. CHA has already stated it will use Vouchers allocated by HUD to convert units to project based Section 8 under RAD, and may therefore be subject to the same administrative fee shortfalls that are set forth in the attached HUD summary's, and the attached NAHRO issuance. How will this affect the administration of units and buildings converted to project based Section 8 under RAD?</p>	
4	Robert Whitfield	<p>Finally, CHA has not confirmed, despite repeated requests, how it will continue to recognize the existing LACs once property is converted from public housing to project based Section 8. None of the provisions of 24 CFR part 964 will (or can) apply once the RAD conversion takes place;, which means that stipends paid to resident council officers (authorized under 24 CFR Part 964) may not be possible. (See the attached excerpts from a 2002 HUD OIG Audit Report.) It is not sufficient for CHA to continually state that is their intent to keep the same provisions allowed under Part 964. The question which should be asked now by CHA (to HUD), is whether HUD will allow a waiver to authorize the continued payment of stipends to officers of resident organizations in buildings and or sites converted from public housing to project based Section 8 under RAD.</p>	<p>CHA will continue to recognize and fund existing resident organizations as they currently exist.</p>

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5	Rosemary Colman, Sr Central; Perry Casey, Sr North; and Pauline Wesley, Sr South	The following initial comments on the draft FY2014 CHA Moving to Work (MTW) Amendments are submitted by the Senior Housing North Local Advisory Council (LAC) President; the Senior Housing Central LAC President; and the Senior Housing South LAC President. The comments are submitted on behalf of the seniors residing in the CHA senior housing buildings throughout the City. The draft MTW Amendment proposes to implement the new HUD flat rent provisions. The new HUD rules states that the minimum PHA flat rent cannot be lower than 80% of the fair market rents. It is requested that CHA consider that in those instances where the calculated 80% of the Chicago fair market rents is lower than the current flat rent assessed to seniors residing in CHA properties, that CHA lower the flat rent assessed to seniors to the 80% minimum required by the new HUD flat rent rule. That would assist the seniors who pay flat rent, but are on a fixed income.	CHA is required to establish minimum flat rents that are at least 80% of FMR. Properties that are already in compliance with this rule will not have a change in the flat rent schedule.
6	Rosemary Colman, Sr Central; Perry Casey, Sr North; and Pauline Wesley, Sr South	The draft MTW Amendment also contains provisions about the Rental Assistance Demonstration (RAD) program. The draft indicates at CHA anticipates implementing RAD at several CHA properties, including 15 senior buildings. The three senior housing LACs are again requesting that CHA provide written assurances related to the proposed CHA RAD initiative. These include a written commitment to obtain a waiver from HUD to allow CHA to utilize the provisions of 24 CFR Part 964 to continue to recognize and fully fund LACs in all CHA properties converted from public housing to project based under RAD; including the payment of stipends to the officers of LACs in properties converted to project based subsidies under RAD.	CHA will continue to recognize and fund existing resident organizations as they currently exist. CHA will take your suggestions under advisement.
7	Rosemary Colman, Sr Central; Perry Casey, Sr North; and Pauline Wesley, Sr South	The senior housing LACs are also requesting that CHA consider revising its stated intent to convert all CHA senior housing buildings to project based subsidies, and that CHA continue to maintain some senior buildings throughout city as public housing instead of converting all senior buildings to project based subsidies under RAD.	Thank you for your comment. CHA intends to ensure resident protections that existing in public housing today are maintained for any future RAD properties.

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8	Rosemary Colman, Sr Central; Perry Casey, Sr North; and Pauline Wesley, Sr South	Finally, it is noted that the Notice for public comments on the CHA draft MTW Amendment provides for three public hearings. However, none of the public hearings are in or near CHA senior buildings. It is requested that CHA revise the notice to provide for additional hearings in CHA senior buildings. This will allow many more seniors to participate in the public comment process for the various CHA draft items that are now out for public comment and hearing.	CHA did hold three hearings, rather than one, during this comment period. Public hearings are not the only medium for providing comments during the public comment period. Comments may also be provided by email, fax or mail. In addition, CHA has held several meetings specifically related to RAD for residents who are affected by potential RAD conversions. CHA will continue to communicate with residents of senior buildings, and other impacted sites, regarding RAD.
9	Thomas Kenemore Ph.D.	I am a resident of the Chicago area, and on the faculty of Chicago State University's Masters Social Work Program. I am writing in support of the CHA Reentry Pilot. I have long been aware of the terrible impact of imprisonment and reentry on the African American community I serve, and am very familiar with the Chicago Coalition for the Homeless and the three reentry service providers participating in the project. I know the importance and quality of their work, and how important stable housing is to successful reentry. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and to fighting homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction an opportunity to obtain stable housing through CHA. Individuals will come to CHA having received services and being recommended by key reentry service providers with over 100 years of experience serving this population. Mayor Emanuel and 125 other diverse endorsers fully support the CHA Reentry Pilot. The CHA Reentry Pilot is not for everyone. It is for those individuals who have truly turned their lives around. Stable housing will help these deserving individuals on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's Moving To Work proposal.	Thank you for your comment in support of the Reentry pilot.
10	Sherri F. Seyfried, Ph.D., ACSW, Professor of Social Work	The CHA Reentry Pilot Project is an extremely important project that will demonstrate how individuals can self actualize when they have the necessary fundamental supports, i.e. housing. I enthusiastically support the continuation of this project.	Thank you for your comment in support of the Reentry pilot.

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11	Dorretta E. Parker Chicago, IL 60649	I am a resident of Chicago writing in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and to fighting homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction an opportunity to obtain stable housing through CHA. Individuals will come to CHA having received services and being recommended by key reentry service providers with over 100 years of experience serving this population. Mayor Emanuel and 125 other diverse endorsers fully support the CHA Reentry Pilot. The CHA Reentry Pilot is not for everyone. It is for those individuals who have truly turned their lives around. Stable housing will help these deserving individuals on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's Moving To Work proposal.	Thank you for your comment in support of the Reentry pilot.
12	Sandra Cornwall	I heard that you talked about the Coalition for the Homeless. I hope you open up the other side of Lathrop, you know, so we can have the homeless have a home. And I would like to say that each person here is important. I always say that. So we have to unite to fight for Lathrop.	Thank you for your comment. CHA is working with the Re-entry Committee of the Chicago Coalition for the Homeless for the proposed re-entry pilot program.
13	Robert Davidson	I'm a resident of Lathrop Homes. And in terms of this 350 people you're talking about bringing back housing for homeless people you just referred to, it's my understanding that there's a freeze on there. And until that freeze is lifted and revitalization is complete, then we'd be able to bring people back and will bring people back, homeless people, bring them into a place of development. Before we give the right to return residents, we should be situated with the residents that's present. So my statement there is with a question in itself. How can we do that if that is not procedural? So I'm questioning is CHA setting themselves up for some kind of liability – liability situation here? Somebody needs to answer that question for me. The other thing is, I would like to talk to Ombudsman office. Do we understand each other? Make sure that we refer to me to the Ombudsman office.	Thank you for your comment. The CAC Liaison will be asked to contact Mr. Davidson to discuss his issues.

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14	Mary Gill	I want to thank you guys for coming out and having each development from Lathrop to Cabrini on the northeast side, all here at Truman in one area to see that there's a handful of us here because there is lack of communication and the information that we were to be here today -- it was just placed on the door in housing. There was no mailing that came out from CHA stating the facts of this meeting, what it was in regard to. We really do appreciate you guys coming out and letting us, you know, know something that is going on at this point. But in the future could you please at least do like a mailing or something from CHA to let us know so more people could come out and be aware what's really going on.	Announcements for the public comment process appeared on CHA's website and in the Chicago Defender (June 25 and July 2) and Chicago Sun-Times and Hoy newspapers (June 27-July 3, weekdays only). In addition, CHA provides information to property managers, service providers, HCV contractors and the CAC/LAC for posting in offices/common areas and to distribute to residents upon request. CHA continuously works to improve and adapt the public comment process as necessary.
15	Oden Thomas	More tenant patrols are needed in all CHA developments. When can this happen for other developments in senior buildings?	CHA senior housing and family developments have tenant patrol programs.
16	Unknown	I do. I support exactly what she said about the mailing. And also we -- If we had a bus, we would have had more residents come.	Announcements for the public comment process appeared on CHA's website and in the Chicago Defender (June 25 and July 2) and Chicago Sun-Times and Hoy newspapers (June 27-July 3, weekdays only). In addition, CHA provides information to property managers, service providers, HCV contractors and the CAC/LAC for posting in offices/common areas and to distribute to residents upon request. CHA continuously works to improve and adapt the public comment process as necessary.

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17	Cynthia Scott	We didn't get much mailing either -- any mailing. We put up flyers, but only a few people could go out and walk and put up the flyers. But, also, if we had a bus, we would have gotten more people to come. And also the one strike -- I'm opposed to it.	Announcements for the public comment process appeared on CHA's website and in the Chicago Defender (June 25 and July 2) and Chicago Sun-Times and Hoy newspapers (June 27-July 3, weekdays only). In addition, CHA provides information to property managers, service providers, HCV contractors and the CAC/LAC for posting in offices/common areas and to distribute to residents upon request. CHA continuously works to improve and adapt the public comment process as necessary. CHA is not currently proposing changes to the one-strike policy.
18	K. Sla	I do not fully support this program. What about those of us who have been on CHA's waiting list for years who did not have a criminal conviction ? WE are still waiting for housing. They have broken eligibility & society rules. Those who have been on waiting list with a CHA number should have been taken off list once convicted. Again, some parts of this pilot program I support, others ,I don't. The re entrees, should not be put ahead of those who have been waiting Years. CHA has been mismanaged so badly & still is, that it's hard for those of us waiting to have much faith in CHA to fulfill a workable, productive action plan.	Thank you for your comments. The proposed re-entry pilot is limited to 50 individuals that would be added to an existing leaseholder's household. The proposed pilot will not impact applicants' place on the wait list.
19	Kathy Dunbar	What I would like to comment on is I was just looking at this one on the top that has that by 2014 HUD requirement of the new flat rent, and I see where it says on here where if you have a four bedroom voucher, which I have right now, the price is dropped really low. I can't even rent with the voucher that I have right now. It says 1561. So how am I supposed to rent, like, a four bedroom with 1164 in 3 Chicago? I just wanted to know. I'm speaking on this right here, the flat rate.	Flat rent does not apply to the HCV program.
20	Kathy Dunbar	And then I'll be through. I just wanted to know what kind of initiative or incentive that the CHA can provide for the youth because all of them getting shot up out here. What kind of programs, if any, that can be provided by CHA for the youth, the kids that's getting killed? Anything?	CHA has a multitude of summer opportunities for youth as well as partnerships with providers in the City of Chicago. Beginning in April 2015, opportunities for 2015 programs should be posted on CHA's website.

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21	Kathy Dunbar	And the next thing I'm concerned about is I have a situation where I have a landlord. It's a slum lord property. Section 8 suggested the property to me, and I want to know what can I do because Section 8 is not going to pay their part of the money but telling me I should pay my portion of the rent when it's on the landlord that his property is falling apart. Even the City - It failed two City inspection, and the City said it should go on the demolition list.. So what do CHA do with things like that? Because I don't feel like I should have to pay them, and they haven't done anything in my house in two years, and it's two disabled people there. Now, although, I have moving papers, it's very hard for me to try to find a four bedroom house in the City of Chicago.	Thank you for your comment. CHA is already in communication to address this matter. Please contact the HCV Call Center at (312) 935-2600 or e-mail hcv@thecha.org for follow-up and resolution (if not already resolved).
22	Francine Washington	I just want to speak on a couple changes...as far as having to re-certify every 2 or 3 years. I just read on it, but we talk about the RAD and we haven't received RAD as of yet. I know we are on the list. So why are we introducing RAD into the ACOP and the ACOP...didn't even come in fruition by the time they pass ACOP? I have to wait for an answer?	HUD is encouraging Public Housing Agencies to make required updates to annual plans and policies in anticipation of future RAD awards.
23	Mable Bradberry	First of all, what you said this evening, I guess, that's CHA talk because I really still don't understand what's going on. All I know is that I got a letter stating that if I'm participating in the flat rent program, that my rent might be -- Okay. I'm in a one bedroom. I been in Wentworth Gardens for 40 years. I raised my kids over there. Now, about three years ago they sent us a letter from CHA, and they said -- I couldn't find the letter because it's been so long, but they said that they were lowering their standards for the flat rent for the one bedroom, two bedroom, three and four. I know they sent that letter. So when they got through, they said that my rent was \$440. That's what I'm paying right now. Now, I want to know how they figure that they're going to jump from 30 percent of your earnings to 80 percent. I don't understand none of it. I don't know today because I am not paying housing \$600, almost \$700 for a one bedroom. What it's about. That's why I'm here. That's out of the question. I couldn't live if I do that. I'm paying \$440. I paid what they 5 told me to pay. I have been an excellent tenant. My kids, they have not been a problem in Wentworth Gardens. They were raised in there. I have kept my house up excellent, and -- I mean, what is this about? How are you going to jump from 30 percent to 80 percent of someone's income? What am I supposed to live off? How can I help my grandchildren. How do I buy them	CHA is adopting flat rent policies in accordance with new HUD guidelines. No public housing tenant will be required to pay more than 30% of their income on rent. Changes above 35% annually will be phased in over a period of three years.

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		<p>gifts for Christmas? How can I do anything if you're going to jump flat rent up like that? It's no way I can pay it. I don't understand what the heck is going on, but I'm here to find out. All this stuff you said, it don't mean nothing to me because I don't understand it. It's about whatever you talking about and, you know, I need somebody to tell me because I'm not going to not live and pay rent.</p>	
24	Taneysha Bass	<p>The first thing I want to comment on was I needed to speak to someone who is (inaudible) boss. (Inaudible) Bailey speak to someone regarding her, and the second issue is my property manager, Alexis Alexander, it's just a lot stuff going on in Altgeld Gardens. People subleasing their unit, selling out their cribs. She don't say nothing about that. I turned in my new baby Social Security card about a month ago to them to add her to the lease. I signed the papers. About two weeks later she still wasn't added to my lease. I went up there today. I asked yesterday did she get the Social Security card. She said no. Just so happen I happen to go up (inaudible) and I asked her did you find it, all of sudden about a month later. I just feel like it's retaliation because I told Ms. Greer that she took my keys from my father. My father kept my property for two days while I was out of town. She took the keys and told him he could not stay in my unit. When somebody four doors down from me subleasing their crib for the last three (inaudible). She said nothing about it. They do inspections. They supposed to use a pass key. I never seen them use a pass key, and I feel that's not right. She even tell the residents I'm telling on them. You're jeopardizing my kids. If I tell they selling drugs out the unit, why are you going back and telling people? And it's coming back to me. People telling me and threatening my kids. That's not fair. So I just feel like isn't nobody doing nothing. I been trying to get transferred (inaudible). It's a lot stuff going on.</p>	<p>CHA is already in communication to address this matter. Miss Bass was also informed CHA following the meeting regarding employment in the summer food program. Her social service provider was asked to contact her the following day.</p>

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25	Francine Washington	I have a lot to say, but I think I'll save it (inaudible). I do have a lot to say, but I'd rather give it to you in black and white.	Thank you for your comment.
26	Kathy Dunbar	Then I was concerned about, too, the landlords who are not taking care of their property and everything, why does CHA not pay their portion and I'm still being made to pay a portion? I just want to know that because that's not fair to me. Why CHA should not pay theirs and I'm being made to pay mine? And they know they're slum houses and stuff.	Thank you for your comment. CHA is already in communication to address this matter. Please contact the HCV Call Center at (312) 935-2600 or e-mail hcv@thecha.org for follow-up and resolution (if not already resolved).
27	Taneysha Bass	The only thing that I had to add was that my property manager -- Like I said, I put in three transfers. She denied all three of them. I have four kids -- well, five kids, as of London, but she keep saying that the three girls should be in one room together, and I'm looking at the ACOP that say two heartbeats per room. I'm not willing to share my room with nobody. My house is very cluttered, and they said I definitely need a transfer. But, once again, I just feel like there's retaliation because I told on her she's not trying to do what she's supposed to do.	CHA is already in communication to address this matter.
28	Hannah Willage	I am writing to strongly support the CHA proposed Sponsor-Based Voucher Program. Creating new opportunities for affordable housing for people trying to escape homelessness is a key tenet of Plan 2.0. Allowing homeless service providers to access vouchers to create subsidized housing with supportive services is an important new way to increase access to affordable housing. In particular, because the CHA vouchers will not require a disability, like many HUD McKinney Vento subsidies, the sponsor-based voucher program could be a great resource for homeless youth and families who are often not disabled. One change I would recommend is that CHA not prioritize vouchers for 0 and 1 bedroom units, but rather consider all unit sizes equally. A large percentage of those having difficulty accessing permanent affordable housing are families who would need larger units.	Thank you for your comment.
29	Elizabeth Rosenthal, LAF, Supervisory Attorney Housing Practice Group	LAF appreciates CHA's diverse approaches to providing housing to people living in poverty. The units provided by the sponsor-based voucher program, however, should not be counted toward the 25,000 units that the CHA has committed to redeveloping or rehabilitating as part of the Plan Forward (formerly the Plan for Transformation). One of CHA's metrics for its statutory objective to increase housing choice is "making additional units of housing available." (HC-1) CHA's own waiting lists have tens of thousands of families waiting for housing. The sponsor-based program appears to be	Thank you for your comment.

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		targeted to a homeless population that likely is not pulled from CHA's waiting lists of existing families or families with a right of return to rehabilitated public housing. With almost a million people living in poverty in Cook County/ CHA should be creating more housing opportunities beyond the 25,000 units provided for in the Plan.	
30	Elizabeth Rosenthal, LAF, Supervisory Attorney Housing Practice Group	LAF wishes to congratulate CHA on its bold move to experiment with a program to provide housing to ex-offenders. We look forward to working with CHA to ensure that this program is successful. CHA should not, however, exclude mixed-income sites from this initiative. CHA recognizes that this is an important family-reunification strategy, but families in mixed-income developments will be excluded from the benefits of the program. CHA should include families in mixed-income communities as eligible for this initiative.	Thank you for your comment. CHA will take your comment into consideration.
31	Elizabeth Rosenthal, LAF, Supervisory Attorney Housing Practice Group	<p>LAF appreciates that budget cuts have required CHA to find new approaches to preserving its existing housing. Our primary concern with the potential RAD conversion is that residents do not lose rights that they have pursuant to the statutes and regulations that govern the public housing program. We outline our primary concerns and recommendations below.</p> <p>CHA must withdraw its RAD applications for North Town Village I and II. The public housing units at North Town Village are subject to the Consent Decree in Cabrini Local Advisory Council v. Chicago Housing Authority, 96 C 6949. The consent decree requires that these units be public housing, and RAD is not public housing. Second, the Consent Decree requires that "CHA shall not dispose of any [property identified in whole or in part for replacement housing under the NNRIJ, except by a long-term lease to a developer with a land use restriction that requires public housing units to be developed and operated pursuant to this consent decree for no less than a forty year period..." Because the maximum leases for the PBV are 20 years, even if they are renewable, RAD conversion violates the Consent Decree.</p>	Thank you for your comment. CHA will consider the impact of the pending RAD application and the Cabrini Consent Decree.
32	Elizabeth Rosenthal, LAF, Supervisory Attorney Housing Practice Group	Although RAD contemplates that a PHA may have a minimum number of units not replaced through a RAD conversion (no more than 5%), CHA should commit to 100% percent replacement for any future RAD conversion. This one-for-one replacement should include all "offline" units in properties slated for	Thank you for your suggestion. CHA intends to use RAD for 100% of the current public housing units included in the pending application.

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		conversion now or in the future. CHA has too many vacant units "offline" (as many as 3000) which is troubling when there are so many people on its waiting lists hoping for affordable housing. Those thousands of vacant units are a critical housing resource and should not be lost to RAD conversion, which is meant, in part, to preserve housing long-term for low-income people.	
33	Elizabeth Rosenthal, LAF, Supervisory Attorney Housing Practice Group	CHA should commit to and request MTW authority to adopt the resident participation procedures contained in Part 964 rather than the resident participation procedures in Part 245. RAD conversion should not materially affect the rights of low-income residents whose units are being converted. The tenant organizing protections of Part 245 are vaguer than those of Part 964, which more clearly delineate the rights and authorities of tenant organizations. Part 964 also provides for funding, resident training, regular meetings with the PHA, and election procedures. Part 245 is a change that would dilute the current tenant representation rights of residents in building slated for RAD conversion. The tenants in the buildings converted to RAD should continue to have representation on and by the Central Advisory Council.	CHA will continue to recognize and fund existing resident organizations as they currently exist. CHA will take your suggestions under advisement.
34	Elizabeth Rosenthal, LAF, Supervisory Attorney Housing Practice Group	CHA should commit to and request MTW authority to adopt the resident grievance procedures in Part 966 including the formal grievance procedures before the Department of Administrative Hearings (DOAH). Again, tenants should not be losing any rights that they currently have, simply because CHA is converting the funding stream. Furthermore, CHA is familiar with administering the current public housing informal and formal grievance procedure. CHA must also remember that any residents in RAD-converted units who are subject to the Relocation Rights Contract have a two-tier grievance process if their right of return is at stake, pursuant to the terms of the Relocation Rights Contract.	CHA will be issuing a revised grievance procedure for public comment and Board approval in the future that retains current public housing grievance processes for residents of future RAD properties.
35	Elizabeth Rosenthal, LAF, Supervisory Attorney Housing Practice Group	CHA should also commit to adopting a lease substantially similar to the public housing lease. At least CHA should include a provision in all RAD conversion leases that a tenant can only be terminated for serious or repeated violations of the lease provisions with the definition of "good cause" for nonrenewal defined by 24 C.F.R. § 966.4(1).	CHA will issue a revised lease for public comment and Board approval in the future that will be substantially based on the current public housing lease agreement.

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36	Elizabeth Rosenthal, LAF, Supervisory Attorney Housing Practice Group	The RAD provisions make clear that no one in a unit being converted to RAD will have to be screened on conversion. What is less clear, however, is what happens to a family that may be over 80% AMI at a subsequent recertification. CHA should allow families in converted units to remain beyond the initial conversion in accordance with the provisions of 24 C.F.R. § 960.261, paying either income based or market rent, whichever is lower.	Thank you for your suggestion. CHA will adhere to all applicable RAD and HUD provisions for transitioning properties.
37	Elizabeth Rosenthal, LAF, Supervisory Attorney Housing Practice Group	CHA should commit to adopt RAD's Choice Mobility provisions that PBVs can be converted to HCVs after one year. This comports with CHA's MTW objective to "increase choices for low-income families."	Thank you for your suggestion. CHA will adhere to all applicable RAD provisions for transitioning properties.
38	A. Anne Holcomb, M.S. Supportive Services Supervisor, Unity Parenting & Counseling, Inc. 600 W Cermak Road, Suite 300 Chicago, IL 60616	We at Unity Parenting and Counseling, Inc. are want to express our support for the CHA Sponsor-Based Voucher Program. Unity Parenting has been providing housing, shelter, and social services for homeless children, youth, and disabled adults on the South Side of Chicago for over 30 years. We currently implement nine programs which include a homeless youth emergency shelter; two homeless youth transitional living programs for young families and single youth, one of which provides housing for youth heads of household who are impacted by HIV/AIDS; a small permanent supportive housing program for homeless youth with disabilities; and a permanent supportive housing program for homeless adults with disabilities. We fully embrace the City of Chicago's goals with "Plan 2.0: A Home for Everyone," especially the goal of creating greater access to affordable housing for homeless youth and adults. As an agency, we have struggled in trying to fill a huge gap in available housing resources. Most HUD housing subsidies are for permanent supportive housing, requiring homeless persons to have a disability and in many cases to also have been chronically homeless by HUD's definition. Unity Parenting's permanent supportive housing program for homeless adults with disabilities is one such HUD subsidized program. The challenge for us is that many of the youth we serve in our youth transitional and youth shelter programs are not disabled. There are almost no housing subsidy programs available for non-disabled youth and young families. We have found that this gap in available subsidized housing programs often effects our highest functioning, most successful clients: the youth who have completed their high school educations/GEDs,	Thank you for your comment.

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		<p>who have gotten entry-level employment, who have even perhaps started college or trade school- while, at the same time, they have been completing all of our program requirements. These youth simply cannot earn enough income, even when working full time at an entry-level job, for a Fair Market Rent apartment. After graduating from our programs, some of these youth have fallen back into homelessness and/or have had to drop out of school simply because there is no affordable housing for them. We have also struggled with finding subsidized housing for our formerly homeless clients who had disabilities but have gotten better and no longer need the intensive supportive services offered with permanent supportive housing. We have found this challenge particularly with clients who have had depression and/or Post Traumatic Stress Disorder. After actively staying in psychiatric care for a few years, participating in therapy, and taking their prescribed medications, they are really ready for independent living with simply a rental subsidy... But there is nowhere in Chicago where we can send them to get one! A CHA Sponsor-Based Voucher Program would begin to fill this need for both of these populations, the homeless youth and young families who are just starting their independent livelihoods and the formerly homeless persons who have disabilities, but who have been healing, and are ready for independence.</p>	
39	<p>A. Anne Holcomb, M.S. Supportive Services Supervisor, Unity Parenting & Counseling, Inc. 600 W Cermak Road, Suite 300 Chicago, IL 60616</p>	<p>One more suggested change: Please consider that a number of formerly homeless persons are actually heads of household for their families. Please do not prioritize vouchers for simply studio and one bedroom apartments, but consider that homeless families, even families headed by youth, come in all shapes and sizes and need units to live in that come in a variety of sizes.</p>	<p>Thank you for your comment. While CHA anticipates that the majority of sponsor-based applications would be for studio and one bedroom units, CHA is not limiting the bedroom size for sponsor-based programs.</p>

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40	Julie Dworkin Director of Policy Chicago Coalition for the Homeless 70 E. Lake St.	I am writing to strongly support the CHA proposed Sponsor-Based Voucher Program. Creating new opportunities for affordable housing for people trying to escape homelessness is a key tenet of Plan 2.0. Allowing homeless service providers to access vouchers to create subsidized housing with supportive services is an important new way to increase access to affordable housing. In particular, because the CHA vouchers will not require a disability, like many HUD McKinney Vento subsidies, the sponsor-based voucher program could be a great resource for homeless youth and families who are often not disabled. One change I would recommend is that CHA not prioritize vouchers for 0 and 1 bedroom units, but rather consider all unit sizes equally. A large percentage of those having difficulty accessing permanent affordable housing are families who would need larger units.	Thank you for your comment. While CHA anticipates that the majority of sponsor-based applications would be for studio and one bedroom units, CHA is not limiting the bedroom size for sponsor-based programs.
41	Betsy Benito Director CSH	CSH (aka Corporation for Supportive Housing) is a proud and consistent partner with the CHA. We work together to inform the CHA's supportive housing platform and foster collaborations with other City of Chicago sister agencies in order to address the housing needs of Chicago's most vulnerable residents. We have also helped promote the work of the CHA nationally, when the CHA has shown leadership and innovation in its efforts to help end homelessness. Chicago is at the forefront of ending homelessness; it is a HUD Priority Community and is participating in the 25 Communities Initiative sponsored by the Veteran's Administration to move us further to the goal of ending Veteran homelessness by 2016. Additionally, thousands of Chicago residents are transitioning out of unnecessary institutional care back into community-based affordable housing with services that effectively address their disabilities. These efforts that target housing to vulnerable populations support Chicago's compliance with the Americans with Disabilities Act and the subsequent Supreme Court Decision known as Olmstead, which requires jurisdictions to serve people with disabilities in the least restrictive settings in the community. Public Housing Authorities play a vital role in stabilizing and advancing the lives of working families and those who need the safety net of safe, decent, and affordable housing in order to access basic services. We are pleased that in the proposed MTW amendment the CHA is reaffirming and clarifying the role it plays in supporting households who are in need of special attention and assistance - where more outreach and access points to housing are needed beyond traditional channels.	Thank you for your comment.

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42	Betsy Benito Director CSH	<i>Re-entry:</i> CSH also commends CHA for revisiting its policies for households that have an immediate family member returning from jail or prison after completing their time. Stable housing in a supportive environment is a key component to preventing recidivism. We support the proposed demonstration program.	Thank you for your comment.
43	Betsy Benito Director CSH	<i>Waitlist:</i> Secondly, CSH commends the CHA for making resources available to assist potential applicants in accessing the website and preparing for the lottery process. While we know that the waiting list lottery is open a short time, the list becomes long , and housing needs change over time, we appreciate there is some effort to connect with hard to reach populations as a part of this process. We would support ongoing consideration for a future amendment to explore limited preferences such as what the Housing Authority of Cook County established for homeless and people with disabilities that we believe will make housing access easier for these populations.	Thank you for your comment. CHA will continue to consider options aimed to help the most vulnerable populations.
44	Jeremy Bergstrom Senior Staff Attorney, Housing Justice Sargent Shriver National Center on Poverty Law	Additionally, the Shriver Center strongly supports the CCH/CHA Reentry Pilot Program. We understand the CCH has provided comments in support of the program, and we adopt their comments and recommendations. We applaud the CHA for taking these initiatives and encourage the CHA to continue to work with the CCH and reentry services providers to expand the program and make it permanent.	Thank you for your comment.
45	Jeremy Bergstrom Senior Staff Attorney, Housing Justice Sargent Shriver National Center on Poverty Law	The Shriver Center is aware that LAF has also provided comments on CHA's proposed changes to its HCV Administrative Plan, ACOP, Moving to Work Amendments, and Lease Agreement. The Shriver Center adopt LAF's comments in addition to our own.	Thank you for your comment.

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46	Charles Barlow	I just wanted to speak to something I addressed this morning at the Board Of Commissioners meeting in relation to the number of documents that have public comments. It's really unprecedented with regard to so many documents at one time. This part of the hearing is about 522 pages of documents of which we have 30 days to make comments. As many of us as CHA staff know, I'm an academic researcher, and I'm trying to do my utmost to do the best I can on those changes. I'm 50 pages into the document, and we are already halfway through the comment period and we have 7,000 words of comments just as far as the documents. At the central advisory meeting, Mr. Titleman said it was possible for CHA to extend the comment period, and I'm wondering if that option can be explored so the public, myself, residents, and others would have the opportunity to write the comments that we wish to write in a more reasonable timeframe. Other people have other things to do beyond just writing comments on CHA documents.	CHA continuously works to improve and adapt the public comment process as necessary. The proposed changes out for public comment were only a portion of the documents. In addition to redlined versions of the documents which indicated specific proposed changes, CHA provided documents summarizing the changes proposed for the HCV Administrative Plan, ACOP and Public Housing Lease.
47	Charles Barlow	And then my last comment for today is in relation to the notification to residents and the public about these public comment hearings. We can see it's more CHA staff here than there are the public. I think that speaks to perhaps a shortcoming in the efforts to notify the public. I know that you wrote it on the website. I'm not sure about anything else. I know that the residents at large want to – were not notified by mail or any other means. I think in the future, it would be great to have a more extensive notification policy in the future.	CHA continuously works to improve and adapt the public comment process as necessary. Announcements for the public comment process appeared on CHA's website and in the Chicago Defender (June 25 and July 2) and Chicago Sun-Times and Hoy newspapers (June 27-July 3, weekdays only). In addition, CHA provides information to property managers, service providers, HCV contractors and the CAC/LAC for posting in offices/common areas and to distribute to residents upon request.
48	Robert Whitfield	Some seniors have asked if the utility payment status now in place at CHA senior buildings will be affected if the CHA senior buildings are converted to project based Section 8 under RAD, and if so how.	CHA will maintain the same utility allowance schedule and process at RAD properties as they exist at non-RAD properties.
49	Robert Whitfield	CHA seniors have also asked if the new HUD mandated flat rent minimum is less than the current CHA flat rent now in place, can CHA lower those flat rents to the HUD required minimum. This would assist those seniors on a fixed income.	CHA is required to establish minimum flat rents that are at least 80% of FMR. Properties that are already in compliance with this rule will not have a change in the flat rent schedule.

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50	Deborah O'Connor	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
51	Hannah Willage	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.

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52	Rob Milburn	<p>We wife and I are residents of Chicago. We love next door to a scattered housing project for 17 years. It's been a good experience.</p> <p>We support the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
53	Susan Coffing	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
54	Roberta Nye	<p>I am a Chicago resident who supports the CHA Reentry Pilot, which will help build safer communities and curb homelessness by giving people who have turned their lives around after a criminal conviction the opportunity to access stable housing.</p> <p>Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under</p>	Thank you for your comment in support of the Re-entry pilot.

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55	Casey Wittekind	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
56	Jennifer Howe	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.

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57	Courtney Davis	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
58	William Lamme	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
59	Jason Coleman	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p>	Thank you for your comment in support of the Re-entry pilot.

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		<p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	
60	Bob Palmer	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
61	James Lacy	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.

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62	Carissa Vardanian	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
63	Jack Wuest	<p>I am writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.

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64	Beth Cunningham	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
65	David Bau	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
66	Andrew Miller	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p>	Thank you for your comment in support of the Re-entry pilot.

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67	Rachel Lyons	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. Having worked with men and women who are returning citizens, I know the power of supportive environments that build on the gifts and assets of folks who are choosing to turn their lives around. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
68	Claire Sloss	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot.</p> <p>The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those</p>	Thank you for your comment in support of the Re-entry pilot.

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		<p>people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	
69	Margaret Kushiner	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
70	Connie Chi	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of</p>	Thank you for your comment in support of the Re-entry pilot.

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		Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.	
71	Mary Fran Riley	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
72	Raminder Kumar	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.

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73	Robin Finesmith	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
74	Julie Nelson	<p>Our community needs to invest in and provide opportunities to move forward to all community members. I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.

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75	Dan Pellant	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
76	Jeffrey Blaine	<p>I am a business owner in Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
77	John Paul Beals	<p>I work with renters in Chicago, including men and women who are in the "re-entry" process. I am writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other</p>	Thank you for your comment in support of the Reentry pilot.

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78	Lisa Troost	<p>I believe this program will go a long way towards reducing recidivism. The cost associated with this program is probably far less than the cost of recurring incarceration. Let's try something new and measure the results. I'm looking forward to the success of this program.</p>	<p>Thank you for your comment in support of the Re-entry pilot.</p>
79	Dan Mendelson	<p>I am a resident of the Chicago area writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	<p>Thank you for your comment in support of the Re-entry pilot.</p>
80	<p>Sherri F. Seyfried, Ph.D., ACSW, Professor of Social Work Chicago State University Department of Social Work/SCI 116 A 9201 S. King Dr.. Chicago, IL 60628</p>	<p>The CHA Reentry Pilot Project is an extremely important project that will demonstrate how individuals can self actualize when they have the necessary fundamental supports, i.e. housing. I enthusiastically support the continuation of this project.</p>	<p>Thank you for your comment in support of the Re-entry pilot.</p>

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81	Richard Goldstein	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
82	Blake Wilkinson	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
83	Caitlin Cubbon	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p>	Thank you for your comment in support of the Re-entry pilot.

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84	Sara Cooper	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
85	Peter Kadens	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.

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86	Yolanda harris	<p>To Whom it may Concern:</p> <p>I am writing in support of the CHA Reentry Pilot Program. I am a resident of Chicago and also a Clinical Social Worker. So I see the value of this program and the impact it will have on the lives of those reentering and the lives of their friends and families. I am supportive because it sounds like consideration has been given to the various support services needed to help reentering persons be successful moving forward. I certainly endorse giving people a second chance whenever possible.</p>	Thank you for your comment in support of the Re-entry pilot.
87	Anthony Hughes	<p>As a citizen of Chicago, I so deeply want to see the city tackle the issue of poverty and homelessness in effective and meaningful ways. Allowing those who are homeless with criminal records an opportunity to be welcomed back into housing and employment is one step closer to responsibly helping those who are marginalized. I support the CHA Reentry Pilot...</p> <p>The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
88	James Kowalsky	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p>	Thank you for your comment in support of the Re-entry pilot.

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89	Rochelle Dyme	<p>I am writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
90	Steven Langston	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.

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91	Mary Nix	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
92	Julie O'Brien	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. it also gives families the opportunities to reunite and build their lives. This is a good thing if there are children involved. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.

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93	Angela Barnes	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
94	Anne Holcomb	<p>We at Unity Parenting and Counseling, Inc. are want to express our support for the CHA Sponsor-Based Voucher Program. Unity Parenting has been providing housing, shelter, and social services for homeless children, youth, and disabled adults on the South Side of Chicago for over 30 years. We currently implement nine programs which include a homeless youth emergency shelter; two homeless youth transitional living programs for young families and single youth, one of which provides housing for youth heads of household who are impacted by HIV/AIDS; a small permanent supportive housing program for homeless youth with disabilities; and a permanent supportive housing program for homeless adults with disabilities.</p> <p>We fully embrace the City of Chicago's goals with "Plan 2.0: A Home for Everyone," especially the goal of creating greater access to affordable housing for homeless youth and adults. As an agency, we have struggled in trying to fill a huge gap in available housing resources. Most HUD housing subsidies are for permanent supportive housing, requiring homeless persons to have a disability and in many cases to also have been chronically homeless by HUD's definition. Unity Parenting's permanent supportive housing program for homeless adults with disabilities is one such HUD subsidized program. The challenge for us is that many of the youth we serve in our youth transitional and youth shelter programs are not disabled. There are almost no housing subsidy programs available for non-disabled youth and young</p>	Thank you for your comment in support of the Re-entry pilot.

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		<p>families. We have found that this gap in available subsidized housing programs often effects our highest functioning, most successful clients: the youth who have completed their high school educations/GEDs, who have gotten entry-level employment, who have even perhaps started college or trade school- while, at the same time, they have been completing all of our program requirements. These youth simply cannot earn enough income, even when working full time at an entry-level job, for a Fair Market Rent apartment. After graduating from our programs, some of these youth have fallen back into homelessness and/or have had to drop out of school simply because there is no affordable housing for them.</p> <p>We have also struggled with finding subsidized housing for our formerly homeless clients who had disabilities but have gotten better and no longer need the intensive supportive services offered with permanent supportive housing. We have found this challenge particularly with clients who have had depression and/or Post Traumatic Stress Disorder. After actively staying in psychiatric care for a few years, participating in therapy, and taking their prescribed medications, they are really ready for independent living with simply a rental subsidy... But there is nowhere in Chicago where we can send them to get one!</p> <p>A CHA Sponsor-Based Voucher Program would begin to fill this need for both of these populations, the homeless youth and young families who are just starting their independent livelihoods and the formerly homeless persons who have disabilities, but who have been healing, and are ready for independence.</p> <p>One more suggested change: Please consider that a number of formerly homeless persons are actually heads of household for their families. Please do not prioritize vouchers for simply studio and one bedroom apartments, but consider that homeless families, even families headed by youth, come in all shapes and sizes and need units to live in that come in a variety of sizes.</p>	
95	Kathy Dunbar	I know these proposals are unfair and a violation of families right to reside in a manner in which allows them to decide what to do in their home or out. That's how I feel.	Thank you for your comment. CHA is already in communication to address this matter. Please contact the HCV Call Center at (312) 935-2600 or e-mail hcv@thecha.org for follow-up and resolution (if not already resolved).

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96	Jacqueline Johnson	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p> <p>The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.</p>	Thank you for your comment in support of the Re-entry pilot.
97	Julie Dworkin	<p>I am writing to strongly support the CHA proposed Sponsor-Based Voucher Program. Creating new opportunities for affordable housing for people trying to escape homelessness is a key tenet of Plan 2.0. Allowing homeless service providers to access vouchers to create subsidized housing with supportive services is an important new way to increase access to affordable housing. In particular, because the CHA vouchers will not require a disability, like many HUD McKinney Vento subsidies, the sponsor-based voucher program could be a great resource for homeless youth and families who are often not disabled.</p> <p>One change I would recommend is that CHA not prioritize vouchers for 0 and 1 bedroom units, but rather consider all unit sizes equally. A large percentage of those having difficulty accessing permanent affordable housing are families who would need larger units.</p>	Thank you for your comment in support of the Re-entry pilot.
98	Michael Nameche	<p>I am a resident of Chicago writing you in support of the CHA Reentry Pilot. The CHA Reentry Pilot is critically important to building safer communities, lowering recidivism and curbing homelessness. The CHA Reentry Pilot gives people who have turned their lives around after a criminal conviction the opportunity to access stable housing. Individuals will come to CHA after being recommended by several reentry service providers, respected providers with more than 100 years of experience serving this population. Mayor Emanuel and 125 other political leaders and organizations have endorsed the pilot.</p>	Thank you for your comment in support of the Re-entry pilot.

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		The CHA Reentry Pilot is not for everyone. It is for those people who have truly turned their lives around. Stable housing will help deserving individuals progress on their path to success. I urge the CHA Board of Commissioners to approve the CHA Reentry Pilot under CHA's "Moving To Work" proposal.	
99	Charles Barlow	I applaud the Chicago Housing Authority for offering three public comment hearings for the public comment process for the Proposed FY2014 MTW Annual Plan Amendment and Updates to the ACOP and HCV Administrative Plan, instead of the more typical single hearing. However, I am disappointed that the public comment hearings occurred so soon after the release of the draft documents. Consequently, members of the public had very limited time in which to read the draft documents in advance of the opportunity to offer oral comments.	Thank you for your comment. The public comment period took place from June 27-July 28, 2014. Comments could be made through a variety of options throughout this period. Oral comments could be made at public hearings as well as by phone. Furthermore, comments were accepted through email, fax or mail.
100	Charles Barlow	Members of the public were only granted two (2) minutes to make a comment at each public comment hearing, or four (4) minutes total if another member of the public yielded their time. Given that the Chicago Housing Authority released more than 500 pages of draft documents, it was impossible for any member of the public to make substantive oral comments in the time allotted.	Thank you for your comment. CHA follows a standard process for conducting public hearings. Public hearings are not the only medium for comment on proposed documents during the public comment period. The actual proposed changes were substantially less than 500 pages and summaries were provided.
101	Charles Barlow	Will the Chicago Housing Authority please confirm how residents of its public housing program, Housing Choice Voucher program residents, and members of the public were notified of the public comment period and the documents released for public comment? As I understand, residents were not informed via any mailings etc., and notice was only posted on the Chicago Housing Authority's website. It is unreasonable to expect residents to check this website (www.thecha.org) with any regularity, and therefore many residents and members of the public were simply unaware of the existence of the public comment period.	Announcements for the public comment process appeared on CHA's website and in the Chicago Defender (June 25 and July 2) and Chicago Sun-Times and Hoy newspapers (June 27-July 3, weekdays only). In addition, CHA provides information to property managers, service providers, HCV contractors and the CAC/LAC for posting in offices/common areas and to distribute to residents upon request. CHA also provides hard copies of public comment documents to the CAC/LAC.

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102	Charles Barlow	Given that the Chicago Housing Authority elected to release so many draft documents for public comment, I do not believe that a period of thirty (30) days was sufficient to allow extensive comments on the full range of draft documents. Indeed, the Chicago Housing Authority released more than 500 pages of draft documents as part of this process. It would have been more reasonable to release each of the four documents individually, with its own thirty (30) day comment period. I believe that this was a very intentional action by the Chicago Housing Authority to limit the opportunity and ability for members of the public to make comments on the draft documents. The need to move forward with the draft documents is a weak excuse. I am deeply disappointed. Indeed, I was unable to comment on any part of the Housing Choice Voucher Administrative Plan as a result of lack of time.	Only portions of the documents out for public comment contained the proposed changes. In addition to redlined versions of the documents which indicated specific proposed changes, CHA provided documents summarizing the changes proposed for the HCV Administrative Plan, ACOP and Public Housing Lease.
103	Charles Barlow	The Chicago Housing Authority states on its Public Notice ~Copies of the Proposed FY2014 MTW Annual Plan Amendment and updates to the ACOP, Residential Lease Agreement, and HCV Administrative Plan are available until July 28, 2014 (5 p.m.) at the following locations: CHA and HCV Administrative Offices 60 E. Van Buren St " I visited the CHA and HCV Administrative Offices on July 2nd to collect copies of the Proposed FY2014 MTW Annual Plan Amendment and updates to the ACOP, Residential Lease Agreement, and HCV Administrative Plan. I visited both the HCV Administrative Office on the east side of the building, as well as the Corporate Office on the west side of the building. No one that I spoke with on the east side of the building were aware of the public comment period, and suggested I try the west side of the building. Upon speaking with the security staff, the Receptionist from the Chicago Housing Authority came downstairs to speak with me. She informed me that documents were not available, despite what the Public Notice stated, and that I would need to contact Nathaniel Tortora-the Freedom of Information Act Officer for the Chicago Housing Authority-to request documents. Once I had made the journey back home, I contacted Nathaniel via e-mail, and he responded the same day stating "We will mail you these documents, they will be placed in the mail today. Sorry again for the inconvenience." I have yet to receive the documents that were allegedly placed in the mail on July 2nd. Of course, I understand that mail can be lost; however, I believe that the Chicago Housing Authority consciously decided to not send the documents in order to limit the amount of time I had available to comment on hard	<p>Thank you for your comment. Hard copies of the documents proposed for public comment are generally available at 8am on the first day of the public comment period. Unfortunately, for this comment period, hard copies of the document were not available in CHA's lobby until July 1. CHA apologizes for the inconvenience, however the documents were available for review on CHA's website at the start of public comment on June 27.</p> <p>CHA did intend to mail hard copies of the document per this request, however the mailing was delayed. CHA later arranged to provide hard copies on July 9, and the copies were provided.</p>

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		copies of the draft documents. I wrote to Nathaniel Tortora again via e-mail on July 9th , informing him that I would be at the Chicago Housing Authority's Corporate Offices that afternoon for Board of Commissioners Committee Meetings, and demanded that hard copies be made available for my collection. Hard copies were provided to me on July 9th, some eight days after I visited the Chicago Housing Authority to collect copies in accordance with the Public Notice. This is completely unacceptable, and I request an explanation for this.	
104	Charles Barlow	The Chicago Housing Authority states on its Public Notice, "Copies of the Proposed FY2014 MTW Annual Plan Amendment and updates to the ACOP, Residential Lease Agreement, and HCV Administrative Plan are available until July 28, 2014 (5 p.m.) at the following locations: ... Central Advisory Council Office 243 E. 32M St.". Hard copies of the Proposed FY2014 MTW Annual Plan Amendment and updates to the ACOP, Residential Lease Agreement, and HCV Administrative Plan were in fact not delivered to the Central Advisory Council until the evening of July 8th , some twelve days after the documents were supposed to be available according to the Public Notice. Even then, the Chicago Housing Authority did not provide a sufficient number of copies to distribute to members of the public and Chicago Housing Authority residents. Instead, the Chicago Housing Authority provided only enough copies for the Local Advisory Council Presidents. This is completely unacceptable, and I request an explanation for this.	Thank you for your comment. The documents were initially emailed to the CAC on July 26, and hard copies were delivered on July 8. CHA will consider providing additional copies for the CAC office for future public comment periods.
105	Charles Barlow	The Chicago Housing Authority advertised three public comment hearings on its public notice. One of these hearings-held at the Major Adams Community Center, on July 15th at 6pm-listed the incorrect address on the public notice. The address listed was "125 S Hoyne, 60612~ when in fact the address is 125 N Hoyne. Why was this incorrect? I believe that the Chicago Housing Authority should extend the comment period and offer this public comment hearing on another date, listing the correct address on the public notice.	CHA apologizes for this error. There are numerous ways to provide comments, other than public hearings, during the public comment period. CHA is unaware of instances in which someone was unable to find the correct location for this hearing.

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106	Charles Barlow	Many of the provisions included in the draft documents are favorable. However, none of the changes go far enough, and the recommendations of the Central Advisory Council in their '2012 Strategies and Recommendations Report' have largely been ignored during the process of revisions to all documents as part of the public comment period. Why has the Chicago Housing Authority chosen to ignore these recommendations? All recommendations made within this Report have come from extensive research and at the request of residents who live in the Chicago Housing Authority's properties.	Thank you for your comment. CHA did provide direct feedback on the CAC's recommendations during the strategic planning process. CHA looks forward to having additional policy discussions with the CAC on items that may not have been included during this first round of UHP.
107	Charles Barlow	The Chicago Housing Authority states that it intends "to utilize RAD ... over the next two years (2014-2015)" (page 1). Given that "CHA learned that the 60,000 unit maximum currently available for RAD had already been reached" (page 1) is this a realistic time frame? What are CHA's plans if this time frame cannot be achieved?	As encouraged by HUD, CHA is preparing for RAD implementation in the event a future RAD award is received.
108	Charles Barlow	Given that RAD currently has a 60,000 unit maximum, is the Chicago's Housing Authority's plan for "approximately 64 public housing properties with 10,935 units" (page 1) a realistic unit goal? 10,935 units represents more than 18% of the current total unit maximum for the United States, and even if the maximum had not already been reached, the number of units the Chicago Housing Authority intends to utilize RAD for is extremely high.	CHA has applied for 10,935 units to be transitioned to Project-Based Vouchers under RAD. HUD will ultimately determine the properties and number of units that will be awarded RAD.
109	Charles Barlow	The Chicago Housing Authority states "CHA has elected to transition the proposed first phase of RAD units to the Project-Based Voucher Program" (emphasis added) (page 1). The language here suggests that the Chicago Housing Authority has a choice to elect to transition the proposed units to a program other than the Project-Based Voucher program. 15 this the case? If it is the case, what are the alternative programs that these units could be converted to, and what are the reasons for these alternative not being utilized? If it is not the case, please provide justification for this being the case	Under RAD, applicants have the option of choosing to operate properties as Project-Based Voucher (PBV) units or Project-Based Rental Assistance (PBRA) units. CHA has elected to operate RAD properties under PBV to preserve many of the existing CHA policies and protocols that public housing residents and property managers are already familiar with.
110	Charles Barlow	The Chicago Housing Authority states "CHA will adhere to the regulations of the RAD program, including the incorporation of key public housing provisions that protect residents' interests and encourage resident participation and self-sufficiency" (page 1) and later that "Resident organizations and representation in place at CHA properties prior to the RAD conversion will continue to be managed and recognized in accordance with current CHA policies and HUD regulations" (page 13). How does the Chicago Housing Authority intend to protect residents' interests and encourage resident	The RAD regulations include provisions to allow for resident organizations and representation in Project-Based Voucher units under RAD. CHA recognizes the importance of resident representation, and intends to continue to recognize and fund existing resident organizations as they currently exist. CHA is working with HUD on the

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		<p>participation when the Local Advisory Councils and the Central Advisory Council, under Title 24 of the Code of Federal Regulations, § 903 and § 964, do not represent Project-Based Voucher program households? The conversion of these units from traditional public housing units to Project Based Voucher program units will remove the rights of representation currently afforded to residents. The Chicago Housing Authority has already eroded the right of resident representation through the Local Advisory Councils and the Central Advisory Council through a previously enacted Moving to Work Waiver with the United States Department of Housing and Urban Development which has resulted in public housing residents at the mixed-income/mixed-finance developments being represented only by the Chicago Housing Authority's Ombudsperson. In the Central Advisory Council's '2012 Strategies and Recommendations Report,' the Central Advisory Council requested that the Chicago Housing Authority rescind the request to the United States Department of Housing and Urban Development for a waiver of Title 24 Part 964 and allow public housing residents at mixed-income sites to form a resident council or join an adjacent or nearby resident council, such as an existing Local Advisory Council. Chicago Housing Authority residents clearly do not want there to be any loss of resident participation, but nevertheless the Chicago Housing Authority has ignored these requests. It is of concern that under RAD, a further 10,935 households will lose the right of resident representation, and I request an explanation for how the Chicago Housing Authority intends to preserve-and ideally expand upon-the right for residents to have representation via the Local Advisory Councils and the Central Advisory Council in the future.</p>	<p>appropriate agreements, policies, and guidance to fully carry this out.</p>
111	Charles Barlow	<p>The Chicago Housing Authority states that "if a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 5 years." (page 12) Does this mean that the right to pay a flat rent instead of an income-based rent will be revoked, given that RAD units will operate under the Project-Based Voucher program? How will this impact residents currently paying flat rents at the properties that are slated for conversion to the RAD program? Is it possible that the right to exercise the option of paying flat rents can be preserved at RAD properties?</p>	<p>CHA will comply with HUD requirements for tenant rent increases as a result of RAD conversion.</p>

Certification for a Drug-Free Workplace

Certification for a Drug-Free Workplace

U.S. Department of Housing and Urban Development

Applicant Name
 Chicago Housing Authority

Program/Activity Receiving Federal Grant Funding
 Moving to Work Demonstration

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

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

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

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

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

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

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

- (1) Abide by the terms of the statement; and
- (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

e. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph d.(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federalagency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

f. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph d.(2), with respect to any employee who is so convicted ---

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

g. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs a. thru f.

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

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

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

Name of Authorized Official Patricia Emanuel	Title Director of Human Resources Administration
Signature <i>Patricia Emanuel</i>	Date September 12, 2013

form HUD-50070 (3/98)
 ref. Handbooks 7417.1, 7475.13, 7485.1 & .3

If an investigation confirms violation of the policy has occurred, the CHA will take corrective action. These measures may include, but are not limited to, written warning, counseling, oral reprimand, suspension, or dismissal of the employee engaging in such misconduct. A record of such disciplinary actions will be placed in the employee's personnel file.

CONFIDENTIALITY

Complaints of harassment, investigation of complaints of harassment, and any corrective action taken in response will be kept confidential to the extent possible.

NO RETALIATION

The CHA forbids any reprisal or retaliation against an employee for filing a good faith complaint of harassment or for supporting or assisting, in good faith, another employee in pursuing a complaint, or filing a discrimination charge. Anyone experiencing or witnessing any conduct he or she believes to be retaliatory should immediately report it to any of the individuals named above. The CHA will not retaliate or discriminate against any employee for exercising any rights under this policy. Retaliation is a violation of this policy.

American with Disabilities (ADA)

The CHA is committed to complying fully with the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act of 1973, and all other state, federal and local laws ensuring equal opportunity in employment for qualified persons with disabilities. We continually review our hiring and selection procedures to assure they are consistent with equal opportunity, and it is our policy to fully explore reasonable accommodations in accordance with the law to enable disabled individuals to safely and effectively perform their jobs. This policy is neither exhaustive nor exclusive.

Reasonable accommodation is available to all disabled employees, where their disability affects the performance of job functions. All employment decisions are based on the merits of the situation in accordance with defined criteria, not the disability of the individual.

The CHA is also committed to not discriminating against any qualified employees or applicants because they are related to or associated with a person with a disability. The CHA will follow any state or local law that provides individuals with disabilities greater protection than the ADA.

Drug Free Environment

The CHA is a Drug Free Work Place and its Policy on drug and alcohol use is one of "Zero Tolerance." Employees must not appear for work with the presence of alcohol or under the influence of alcohol or illegal non-prescribed drugs in their systems. Employees are prohibited from possessing alcohol or illegal non-prescription drugs. Employees who take prescribed drugs that affect their cognitive abilities should not report to work and should use appropriate leaves. Employees who violate this Policy will be terminated.

Employees are required to participate in drug and alcohol testing at a CHA designated testing facilities in the following circumstances:

1. Upon the CHA's making a conditional offer of employment.
2. Upon re-employment or return from any period of continuous absence of thirty (30) calendar days or more.
3. In instances where the employee has been involved in an automobile accident during the course of employment, regardless of whether the automobile is a CHA vehicle or the employee's vehicle and regardless of whether the employee is injured, the employee must submit to a medical evaluation which includes drug and alcohol testing as immediately after the accident as practical under the particular circumstances, but in no event later than twenty-four (24) hours after the accident.
4. In instances where the employee has suffered an alleged accident, regardless of whether the employee is injured or not, the employee must submit to a medical evaluation which includes drug and alcohol testing immediately after the accident or as soon as practical under the particular circumstances, but in no event later than twenty-four (24) hours after the accident.
5. In instances where the employee's supervisor has a reasonable suspicion that, the employee is at work under the influence of drugs and/or alcohol.

Employees who occupy safety sensitive positions will be subject to random or periodic drug testing.

The CHA drug and alcohol testing vendors are N.I.D.A. accredited. Drug and alcohol test results are confidential and are not disclosed to third parties by the CHA, except upon express written authorization of the employee or as required by law. Employees who submit to drug and alcohol testing described above and whose test results show a positive result will be terminated. Employees who refuse to cooperate in the testing process will be terminated. Employees whose test results are positive may elect to have the sample re-tested at a different N.I.D.A. accredited laboratory at the employee's cost. Arrangements for re-testing must be made through the Director of Human Resources.

The CHA is committed to being a drug-free, healthful, and safe workplace. You are required to come to work in a mental and physical condition that will allow you to perform your job satisfactorily.

Under the Drug-Free Workplace Act, if you perform work for a government contract or grant, you must notify the CHA if you have a criminal conviction for drug-related activity that happened at work. You must make the report within five (5) days of the conviction.

If you have questions about this policy or issues related to drug or alcohol use at work, you can raise your concerns with your supervisor or the Human Resources Department without fear of reprisal.

Immigration Law Compliance

The CHA is committed to complying with the immigration laws that require we employ only citizens and others who are authorized to work in the United States. The CHA does not, however, discriminate on the basis of national origin.

In compliance with the Immigration Reform and Control Act of 1986, each new employee, as a condition of employment, must complete the Employment Eligibility Form I-9 and present documentation that establishes identity and employment eligibility. Former employees who are rehired must also complete the form if they have not completed an I-9 with the CHA within the past three (3) years, or if their previous I-9 is no longer retained or valid.

Employees may raise questions or complaints about immigration law compliance without fear of reprisal.

Relationships in the Workplace

When relatives or persons involved in a dating relationship work in the same area of an organization, it may cause problems at work. In addition to claims of favoritism and morale issues, personal conflicts from outside can sometimes carry over to work.

For this policy, we define a relative as any person who is related to you by blood or marriage, or whose relationship with you is similar to that of a relative. We define a dating relationship as a relationship that might reasonably be expected to lead to a consensual "romantic" relationship. This policy applies to all employees regardless of their gender or sexual orientation.

Our policy is that an employee may not directly work for a relative or supervise a relative. We also discourage a person in a dating relationship to supervise or to report for that person. The CHA also reserves the right to take quick action if an actual or potential conflict of interest arises involving relatives or persons involved in a dating relationship who are in positions at any level (higher or lower) in the same line of authority that may affect the review of employment decisions.

If two employees become relatives, or start a dating relationship and one of them supervises the other, the acting supervisor is required to tell management about the relationship. The two employees are to decide which one of them is to be transferred to another available position. If they do not make that decision within thirty (30) calendar days, the CHA will decide who to transfer or, if necessary, terminate.

There may also be situations when there is a conflict or the potential for conflict due to employee relationships, even if there is no direct reporting or authority involved. In that case, we may reassign or terminate his/her employment. If you are in a close personal relationship with another employee, we ask that you avoid displays of affection or excessive personal conversation at work.



CHA Sites for Work Performance:

- 1. Chicago Housing Authority**
60 East Van Buren
Chicago, IL. 60605

- 2. Charles Hayes Family Investment Center (FIC)**
4859 South Wabash Avenue
Chicago, IL. 60615

- 3. HCV Regional Office**
West Office
2750 West Roosevelt Road
Chicago, IL. 60608

- 4. HCV Regional Office**
South Office
10 West 35th Street
Chicago, IL. 60616

CHA Local Asset Management Plan

The amended Moving to Work Agreement, effective June 26, 2008, authorizes the Authority to design and implement a local asset management program for its Public Housing Program. As identified in the amended MTW agreement, the term “Public Housing Program” means the operation of properties owned or subsidized by the Authority that are required by the U.S. Housing Act of 1937 to be subject to a public housing declaration of trust in favor of HUD.

The CHA has developed this program to ensure that accounting and financial reporting methods comply with OMB Circular A-87 regarding cost allocations, OMB Circular A-133 regarding audit requirements, and generally accepted accounting practices (GAAP).

The local asset management program incorporates the following key components:

- Implementation of project-based management – CHA has decentralized property operations to each property by contracting with professional private management companies. These private management companies manage the day-to-day operations in accordance with HUD public housing requirements and are overseen by CHA’s Asset Management staff.
- Budgeting and accounting – Public housing operating budgets at the property level are completed annually and the related accounting activities are maintained at that level as well. This model allows the Authority to operate and monitor its asset portfolio as Asset Management Projects (AMPS).
- Financial management – Financial analysis is performed on a monthly basis, at the property level, to ensure operating budgets are properly managed. Financial reporting requirements are in accordance with the amended Moving to Work Agreement as well as OMB Circular A-87.

Program Principles

CHA’s Public Housing Program’s local asset management plan applies the following principles related to program costs:

- Costs incurred are deemed reasonable and consistent with the amended Moving to Work Agreement.
- Costs shall be accorded consistent treatment.
- Costs shall be determined in accordance with GAAP.
- Costs are adequately documented.
- CHA will report results according to HUD MTW guidelines.

Cost Allocation Approach

CHA’s Amended and Restated Moving to Work Agreement identifies either a “fee-for-service” option or an “indirect cost” option to be utilized to distribute direct and indirect costs under local asset management plan under Circular A-87. CHA utilizes an indirect cost allocation. CHA is in keeping with 24 CFR 990 and uses property level management, accounting, and budgeting and has established a Central Office Cost Center (COCC).

As stated in Circular A-87, there is no universal rule for classifying costs as either direct or indirect. A cost may be direct with respect to some specific service or function, but indirect with respect to the final cost objective. Direct costs associated with project activities are allocated to the specific properties receiving the benefit of the expenditure. Direct and indirect costs associated with the COCC are allocated on a reasonable basis and, if allocated to public housing properties, are substantially done using a project unit distribution basis.

The following Central Office Cost Center business units are in place at CHA:

- Executive Office
- Asset Management
- Housing Choice Voucher
- Office of Development Management

- Legal Services
- Finance
- Resident Services

CHA Cost Objectives Under MTW

As a Moving to Work Demonstration program agency, the CHA utilizes single fund flexibility which allows the combination of the Public Housing Operating Fund, Public Housing Capital Fund, and Section 8 Housing Choice Voucher Program funding sources. Cost objectives for each program are taken into consideration as program level budgets are developed, accounting activities implemented, and financial reporting designed.

Direct and indirect costs associated with the COCC are allocated on a reasonable basis and use a cost benefit approach. The following tables include, but are not limited to, the direct and indirect costs associated with CHA’s Moving to Work Demonstration program:

Program Direct Costs	
Operating subsidies	Operating costs directly attributable to properties
Asset Management Department costs	Housing assistance payments
Capital improvement costs for properties	Property development costs
Resident Services Department costs	Legal costs
Insurance Costs	Housing Assistance Payments
Housing Choice Voucher department costs	Portability fees and expenses
Homeownership program costs	Any other cost readily identifiable to a property

Program COCC Indirect Costs	
Executive management costs	Procurement-related costs
Personnel administration costs	Information technology services
General finance and accounting costs	Grant management costs
Shared services costs	Any other administrative or indirect cost

Financial Reporting

CHA utilizes a project-level accounting system to track costs at the asset management property level and submits information to HUD through the following reporting systems:

- PIH Information Center (PIC);
- Voucher Management System (VMS);
- HUD Financial Data Schedule (FDS) on an annual basis; and
- The Annual Audit, with necessary supplemental schedules (Comprehensive Annual Financial Report)



CHA

CHICAGO HOUSING
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CEO, Chicago Housing Authority

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